### Written Scoping Comments

- Part 1: Agency and Public
   Interest Group Comments
- Part 2: Citizen Comments
- Part 3 Comments not on the EIR

Part 1:

#### Agency and Public Interest Group Comments

Oakland, CA 94612

PH: (510) 208-7400

www.AlamedaCTC.org

July 11, 2012

Ashley Nguyen, EIR Project Manager Metropolitan Transportation Commission **101 Eighth Street** Oakland, CA 94607-4700 anguyen@mtc.ca.gov

#### **Comments on Notice of Preparation of a Draft Environmental Impact** SUBJECT: **Report for Plan Bay Area**

.

Dear Ms. Nguyen:

Thank you for the opportunity to comment on the Notice of Preparation (NOP) for the Draft Environmental Impact Report (EIR) for Plan Bay Area. Plan Bay Area will guide transportation investment in the nine-county San Francisco Bay Area for the next 28 years and will serve as the updated Regional Transportation Plan (RTP). In addition, this is the first EIR for an RTP that will include a Sustainable Communities Strategy (SCS), the long range land use companion to the RTP's transportation investments, as required by SB 375.

We have reviewed the NOP and submit the following comments:

- 1. While the primary purpose of SB 375 is to integrate land use and transportation planning to help lower Greenhouse Gas (GHG) emissions and vehicle miles travelled through the development of a SCS, there are other goals and mandates that should be considered in the EIR. These include the region's commitment to Fix It First and congestion relief. In this regard, the EIR should consider level of service for all modes in addition to vehicle miles traveled.
- 2. The EIR is intended to include appropriate land use and transportation information in the Plan and EIR so that lead agencies and local jurisdictions can use SB 375 CEQA Providing CEQA streamlining provisions is critical to the streamlining provisions. implementation success of the SCS. Alternatives that test various land use designations, densities, building intensities, and applicable policies should ensure that assumptions tested are consistent with local policies and can be implemented and that adequate resources are identified for local agencies to plan, design and construct land use and transportation improvements. It should also consider the CEQA streamlining of nonresidential uses as well as residential land uses.
- 3. The EIR should include two additional alternatives. One that reflects current local general plans and current regional growth trends. This alternative should be tested with the preferred transportation investment strategy both with and without the recommended

climate policy initiatives. This alternative would better assess what would happen if the currently adopted preferred scenario is not able to be implemented for any reason, such as the economy. A second alternative that should be considered is a realistic jobs scenario to test what would happen if the economy recovers more slowly than is assumed in the currently adopted preferred scenario.

- 4. Because the Plan will direct land use development, including uses that generate or consume local tax revenues, the DEIR should consider impacts to public finances and other public services, such as schools, sewers, fire and police, that are funded by those local tax revenues.
- 5. The EIR Alternatives analyzed should be feasible as required by SB 375 and comparable to the Project Alternative. Alternatives #4 (Enhanced Network of Communities) and #5 (Environment, Equity and Jobs) contain elements should be carefully considered as to whether they are feasible, such as "zeroing out the in-commute," and assuming low income populations do not need roadway and transit improvements in outlying areas, and assuming that highway funding sources can be transferred and applied to transit projects.
- 6. The EIR should address how transit will be supported by the Express Lane network.
- 7. Alameda CTC supports the tiering aspect of the EIR and have heard from our local jurisdictions that being able to tier from the EIR in the following three areas are important:
  - a. Air Quality: particularly for toxins and pollutants that occur during construction of projects, regional mitigation measures or other findings to support local the construction and short term impact of projects are needed.
  - b. Greenhouse gas reductions: the region should consider investigating the feasibility of developing a regional carbon credit bank to address greenhouse gas impacts.
  - c. Traffic: local jurisdictions could benefit from a regionwide trips generated approach similar to the approach being explored in San Francisco's Automobile Trips Generated study and included conceptually in Alameda CTC's 2011 Congestion Management Program. Such a program could be developed in a way that allows jurisdictions to opt in and would allow developers to pay a fair share towards a project's impacts.
- 8. Mitigation measures in the EIR should consider ways to encourage development through the use of more positive incentives than negative ones. Fees and subsidies, especially for non-residential uses, can serve as disincentives to attracting jobs, which are critical to the region's economic development. Any additional fees and subsidies should consider local policies. Mitigation measures should also include the continuation of supportive regionwide Transportation Demand Management strategies and address efficient delivery of goods to and from PDAs.

Thank you again for the opportunity to comment on this important NOP. Please feel free to contact me at 510/208-7405 if you have any questions.

Sincerely,

Abalikas

Beth Walukas Deputy Director of Planning

- Cc: Alameda CTC Board of Directors Art L. Dao, Executive Director Steve Heminger, MTC Executive Director Ezra Rapport, ABAG Executive Director
- File: CMP Environmental Review Opinions Responses 2012/13 RTP/Comments

# Burster Astronomy

From:Ashley NguyenTo:Brenda Dix; Stefanie HomDate:7/11/2012 3:53 PMSubject:Fwd: SCS EIR Scoping CommentsAttachments:SCS Letter 7.10.12 new.pdf; Alternative 4.pdf; SCA Item 4 EIR.pdf; SCS2\_Handout\_First\_Round\_Results\_v6.ppt; SCS PerfTargetsSCS-RTP.pdf; SCS ScenarioAnalysisOverview.pdf;SCS\_Draft\_First\_Round\_SCS\_Results.doc; SCS\_Indicators\_v3.pdf

Ashley Nguyen Senior Transportation Planner/Analyst Metropolitan Transportation Commission 101 Eighth Street | Oakland, CA 94607 Tel. 510.817.5809 | Fax 510.817.5848

>>> Linda Best <lbest@cococo.org> 7/11/2012 3:28 PM >>>

Please see attached letter, proposed EIR alternative and attachments for the SCS EIR Scoping process. Thank you.

Linda Best President & CEO Contra Costa Council

Executive Director

Contra Costa Economic Partnership

1355 Willow Way, #253 Concord, CA 94520 925-246-1880 925-674-1654 FAX Ibest@cocco.org





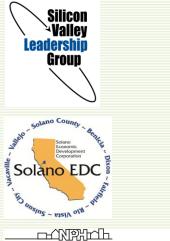
BUILDING INDUSTRY ASSOCIATION











「日」、NF行口 ユロ」 THE NON-PROFIT HOUSING ASSOCIATION OF NORTHERN CALIFORNIA July 12, 2012

Metropolitan Transportation Commission Planning Committee ABAG Administrative Committee

Dear Committee Members:

The Bay Area Business Coalition, joined by Non-Profit Housing of Northern California, appreciates all of the effort that has gone into drafting the recommended alternatives to be studied in the EIR on the Sustainable Communities Strategy.

We respectfully request that MTC and ABAG consider the attached "Enhanced Network of Communities" alternative. This alternative builds on the already aggressive smart growth policy-based land use pattern developed by ABAG and adopted by MTC two years ago in T2035, and enhances it in key respects. First, this alternative accommodates 100% of the region's housing needs during the planning period—and is therefore the only proposed alternative that complies with both the letter and intent of SB 375.

Second, the alternative's base land pattern was shown to achieve ambitious and achievable GHG reduction by MTC and ABAG in the attached analysis *Current Regional Plans Scenario, Analysis Results, Feb. 9, 2011*. Additionally, its GHG performance will be significantly improved by proposing that all of the additional housing needed to accommodate 100% of the region's housing needs be accommodated in PDAs, and by shifting some units from the base modeled in 2011 to PDAs. This alternative ultimately establishes an initial target of directing 195,000 units in PDAs, with the flexibility to be modified based on the results of a PDA Assessment as described in the attached document: something we have long sought and has previously been determined by MTC and ABAG to be essential for an accurate and informed SCS.

Third, this alternative also targets an additional 45,000 jobs for the region, a very important economic development objective.

Fourth, this alternative has as objectives improving upon the performance of the Proposed Project with respect to what we think are some of the key Performance Targets and Regional Indicators adopted by the agencies, addressing highway and local roads state-of-good-repair, alleviating concentrations of poverty, poor school quality, and crime.

Because we are very concerned that the Proposed Project may not be realistic or feasible, we believe that it is prudent to include our recommended alternative which provides a more feasible alternative while still making significant progress in achieving GHG emissions reductions, housing the region's entire need, and providing more jobs and economic growth.

We also call to your attention that SB 375 requires that an adopted SCS must meet the GHD reductions targets "if feasible to do so." We agree that we should make every reasonable effort to reduce GHG emissions, but we must be realistic in what we can accomplish. In conclusion, we strongly encourage you to recommend our proposed alternative to be studied in the EIR. Thank you for your consideration.

Sincerely yours,

in Winn TAC Paul Canyon

Jim Wunderman Bay Area Council

John Coleman **Bay Planning Coalition** 

**Paul Campos BIA Bay Area** 

Amai Best

Linda Best Contra Costa Council

Karen Engel East Bay EDA

**Gregory McConnell** Jobs & Housing Coalition

Cynthia Munay

Cynthia Murray North Bay Leadership Council

Michael Lome

Michael Lane **Non-Profit Housing** of No. California

Re S. Forest

**Rosanne Foust** SAMCEDA

Sandy Person Solano EDC

#### RTP EIR Scoping: Alternative 4

#### Name: Enhanced Network of Communities

Elements:

- Based on the land use pattern identified as "Current Regional Plans/Projections 2011" in the attached February 9, 2011 agency presentation to the MTC Planning Committee.
- Uses the same demographic inputs as the Proposed Project except that it includes the additional housing units identified in the attached June 8, 2012 agency presentation Scoping EIR Alternatives sufficient to housing 100% of the region's housing needs, *i.e.* eliminate in-commuting by the end of the planning period (thus the "Enhanced" in the name of the alternative).
- Targets 195,000 for PDAs, with the final totals to be modified pending the results of the PDA Analysis proposed by the Business Coalition. These units are to be distributed consistent with the PDA pattern of the Proposed Project but modified as necessary such that the location of the additional units results in a 25% improvement in performance (for those units) over the Proposed Project with respect to three of the adopted Performance Indicators: Poverty (reduce % of new household growth in areas with greater than 30% double the national poverty rate); School Quality (reduce % of new household growth in areas with a mean School API less than 800); Crime (reduce % of new household growth with highest violent crime rates (800+ annual per 100,000 pop.)
- Same UGB assumptions as the Proposed Project\*
- Same subsidies as the Proposed Project (except no new development fees)
- Same OBAG, plus streamlining, plus redevelopment as outlined in the Jobs-Housing Connection alternative, except OBAG funding conditioned on receiving jurisdiction identifying and eliminating or reducing local regulatory constraints to achieving the jobs and housing development as envisioned in PDAs
- Same Transportation Investments as Proposed Project except modified to improve upon the performance of the Proposed Project with respect to Performance Targets 10a (Improve Local Road Pavement Index) and 10b (Share of Distressed Highway Lane Miles). We would like to work with staff to determine the appropriate modeling inputs.
- We are amenable to including pricing options in our alternative, but only those policies over which MTC has authority. This would include, for example, higher bridge tolls during peak hours.
- Same "reduced parking minimum" as the Proposed Project

\*We have questions about the legality/feasibility of this assumption as all of the prior RTP EIRs have found this type of policy change beyond the scope of either MTC's or ABAG's authority. However, at present we will align Alternative 4 with the Proposed Project.

Discussion:

CEQA case law identifies several core purposes of the alternatives analysis including (1) fostering informed decision making and (2) identifying feasible and reasonable alternatives that are likely to reduce at least one of the likely significant impacts of the Proposed Project. An alternative may increase some potential impacts in some areas while reducing others. An alternative should potentially be able to achieve most of the Project's basic objectives, but need not meet all of them. Alternatives must be reasonable and potentially feasible. *See City of Long Beach v. LAUSD* (2009) 176 Cal.App.4<sup>th</sup> 889; *Mira Mar Mobile Community v. City of Oceanside (2004) 119 Cal.App.4<sup>th</sup> 477; Save San Francisco Bay v. BCDC* (1992) 10 Cal.App.4<sup>th</sup> 922.

With respect to Project objectives, SB 375 contains two statutory requirements: (1) the adopted SCS must identify sufficient areas to accommodate the region's entire housing need over the planning period; and (2) the adopted SCS must meet the region's GHG reduction targets if feasible to do so and so long as compliance does not result in violating federal planning requirements applicable to nonattainment areas under the federal Clean Air Act.\*\* The agencies have identified several additional Project objectives/goals: 1) Create jobs to maintain and sustain a prosperous and equitable economy; 2) Increase the amount, accessibility, affordability, and diversity of housing; 3) Create a network of complete communities; 4) Protect the region's unique natural environment (See May 4, 2012 staff presentation). The agencies also adopted a set of Performance Targets and Indicators.

\*\*We note that the May 4, 2012 staff presentation to the ABAG Administrative Committee and MTC Planning Committee portrayed the GHG target attainment as an unqualified requirement by placing ellipsis in place of the key statutory language regarding feasibility:

"...set forth a forecasted development pattern for the region, which, when integrated with transportation network, and other transportation measures and policies, will reduce GHG emissions from autos and light trucks to achieve GHG...emission targets approved by ARB

The text of the statute actually reads as follows:

"65080(b)(1)(B) Each metropolitan planning organization shall prepare a sustainable communities strategy, subject to the requirements of Part 450 of Title 23 of, and Part 93 of Title 40 of, the Code of Federal Regulations, including the requirement to utilize the most recent planning assumptions considering local general plans and other factors...(vii) set forth a forecasted development pattern for the region, which, when integrated with the transportation network, and other transportation measures and policies, will reduce the greenhouse gas emissions from automobiles and light trucks to achieve, if there is a feasible\*\*\* way to do so, the greenhouse gas emission reduction targets approved by the state board, and (viii) allow the regional transportation plan to comply with Section 176 of the federal Clean Air Act (42 U.S.C. Sec. 7506).

\*\*\*SB 375 defines "feasible" using the same definition as found in the CEQA statute.

The Enhanced Network of Communities satisfies CEQA's alternatives requirements and promotes its purposes. First, unlike the Proposed Project and the other identified potential alternatives, it complies with SB 375's requirement to identify sufficient areas to house the region's entire housing need over the planning period. The lead agencies have acknowledged that the 660,000 housing units projected in the Proposed Project and other alternatives will either maintain or increase current levels of in-commuting by Bay Area workers who cannot find adequate housing of the type they prefer at an affordable price. We believe SB 375 requires the final SCS to be based on a projected housing figure that is sufficient to eliminate projected incommuting by the end of the planning period. Indeed, that is a fundamental purpose of the statute.

Second, although the base land use pattern achieved a 10% GHG reduction by 2035 according to the Feb. 9, 2011 presentation (less than the 15% target), our alternative includes additional housing (all in PDAs) to eliminate in-commuting, which should improve GHG performance significantly. We also have an initial target of redirecting some units from the base 2011 Projections to PDAs. In addition, as noted, the statute does not require the final SCS to meet the target if doing so is infeasible. We believe the record to date casts very serious doubt on whether the 15% target is achievable with a reasonable and realistic set of land use and transportation assumptions. Also, the fact that our alternative (again based on Current Regional Plans) was essentially adopted by MTC just two years ago, necessarily means MTC made findings that it substantially advanced Project goals and objectives—including with respect to GHG reduction as T2035 included a GHG reduction target based on AB 32 that is more aggressive than the SB 375 targets, while at the same time rejecting as infeasible the environmentally superior alternative that performed better on GHG reduction.

Third, our alternative is likely to perform better on several potentially significant environmental effects associated with the Proposed Project. The EIRs and administrative records for prior RTPs both in the Bay Area (See, e.g., Final EIRs for T2035 and T2030, especially discussions of alternatives and required CEQA findings) and other major regions of the state have shown that projected land use patterns with more aggressive densification/intensification in urban core areas generally has greater environmental impacts in these areas:

- Aesthetics (Shade/Shadow)
- Air Quality (Risk/Population adjacent to TAC)\*\*\*\*
- Cultural Resources (Historic Resources)
- Hazardous Materials (Disturbance of Contaminated Property)
- Land Use (Disruption or displacement of existing land uses; neighborhoods, and community character; conflict with adopted local general plans and zoning ordinances)
- Noise (Construction, Land Use Compatibility, Vibration)
- Transportation, Traffic (Vehicle/Truck Delay)
- Cumulative Impacts in the above areas

\*\*\*\*Under the recent *Ballona* and prior case law, we do not believe this is a CEQA issue. However, should the agencies treat it as such, or analyze it outside the bounds of CEQA, this conclusion holds true. Fourth, our alternative expressly seeks to improve on the performance of the Proposed Project on key requirements, Performance Targets, and Performance Indicators: Adequate housing, roadway state of good repair, and certain equity indicators.

In sum, the Enhanced Network of Communities is an appropriate alternative that is supported by a wide spectrum of stakeholders and we believe there is no legitimate reason not to include it in the EIR process.



#### To: MTC Planning Committee, ABAG Administrative Committee

Date: June 1, 2012

Fr: Assistant Executive Director, ABAG Executive Director, MTC

Re: Plan Bay Area: EIR Scope and Alternatives

MTC and ABAG are co-lead agencies for the preparation of a programmatic Environmental Impact Report (EIR) for Plan Bay Area. This environmental assessment fulfills the requirements of the California Environmental Quality Act (CEQA) and is designed to inform decision-makers, responsible and trustee agencies, and the general public of the range of potential environmental impacts that could result from implementation of the proposed Plan Bay Area. The EIR recommends a set of measures to mitigate any significant adverse regional impacts identified in the analysis.

As a programmatic document, this EIR presents a region-wide assessment of the potential impacts of the proposed Plan Bay Area. In addition, as a first-tier environmental document, this EIR supports second-tier environmental documents for:

- Transportation projects and programs included in the financially constrained plan, and
- Residential or mixed use projects and Transit Priority Projects (TPPs) consistent with the Plan per Senate Bill 375.

The Plan Bay Area EIR does not evaluate subcomponents of the proposed Plan nor does it assess project-specific or site-specific impacts of individual transportation or development projects, which are required to separately comply with CEQA and/or National Environmental Protection Act (NEPA), as applicable.

The MTC and ABAG boards adopted a preferred land use strategy and transportation investment strategy at a joint meeting last month. The preferred strategies provide the basis for the CEQA "project" that will be evaluated by this program EIR. This EIR will also analyze a range of reasonable alternatives to the proposed project that could feasibly attain most of the Plan's basic project objectives and would avoid or substantially lessen any of the significant environmental impacts. Due to budgetary and scheduling constraints, this EIR is proposed to evaluate up to four alternatives, including the CEQA-required "No Project" alternative.

Agency and public comments on the scope of the environmental analysis and alternatives will be solicited through the Notice of Preparation (NOP) to be issued on June 11, 2012 for a 30-day review period and at four regional scoping meetings to be held starting on June 20, 2012 through June 28, 2012.

At your June 8 meeting, staff will review the attached presentation which lays out a proposed approach, methods and draft alternatives for your review and comment. We expect to modify the

MTC Planning Committee/ABAG Administrative Committee EIR Scope and Alternatives Page 2 of 2

alternatives in response to committee comments and comments submitted during the scoping process. Following the scoping process, staff will present final alternatives to the MTC Planning/ABAG

Administrative Committees for review on July 13, 2012 and the Commission and ABAG Executive Board for approval on July 17, 2012. The full schedule of milestones is provided in Table 1, attached to this memorandum.

nes

Patricia Jones

Steve Heminger

SH:AN

J:\COMMITTE\Planning Committee\2012\June\EIR\_Scope-Alternatives.doc

#### TABLE 1

Dates	EIR Milestones
June 8	Present Draft Alternatives for review by Joint MTC Planning/ ABAG Administrative Committees
June 11	Release Notice of Preparation for 30-Day Public Review Period
	(Comment Period: June 11, 2012 – July 11, 2012)
June	Hold Regional Scoping Meetings
	• June 20 – Oakland
	• June 21 – San Jose
	<ul> <li>June 26 – San Francisco</li> <li>June 27 – San Rafael</li> </ul>
	June 27 – San Karaer
July 13	Present Final Alternatives for review by Joint MTC Planning/ABAG
	Administrative Committees and recommendation to the Commission and
	ABAG Executive Board
July 19	Commission and ABAG Executive Board approve Final EIR Alternatives
July - December	Prepare Draft EIR
December 14	Release Draft EIR for 45-Day Public Review Period by Joint MTC Planning/
	ABAG Administrative Committees
	(Comment Period: December 14, 2012 – January 31, 2013)
January 2013	Hold Public Hearings on Draft Plan and Draft EIR
February	Property Final FID (includes Despense to Commente)
February – March 2013	Prepare Final EIR (includes Response to Comments)
April 2013	Commission and ABAG Executive Board Certify Final EIR and Adopt Final Plan

# BayArea BayArea

# **Scoping the EIR Alternatives**

Joint MTC Planning/ABAG Administrative Committees June 8, 2012

#### BayArea

### The Three E's of Sustainability:

### (Environmental Impact Report)

Purpose

EIR

- Identify the Plan's significant impacts on the environment
- Evaluate a range of reasonable alternatives to the Plan
- Determine how the Plan can avoid or mitigate significant impacts

## Scope

- Presents region-wide assessment of the proposed Plan and alternatives
- Provides CEQA streamlining opportunities for:
  - transportation projects and programs included in the financially constrained Plan
  - development projects as defined by SB 375

# **ENVIRONMENT**

RACE AND AND

## BayArea

The Three E's of Sustainability:

EQUITY

2

# **Equity Analysis**

- Purpose
  - Assess the equity implications of all alternatives included in the Plan Bay Area EIR
  - Identify the benefits and burdens of land use impacts and transportation investments for different socioeconomic groups

# Timeline

- Analysis takes place in parallel with EIR
- Equity Analysis Report slated for completion in early 2013

#### BayArea The Three E's of Sustainability:

# **3** ECONOMY

899232

Y

# **Economic Impact Analysis**

- Purpose
  - Assess economic impacts of Plan Bay Area's land use patterns and transportation investments on regional economy

### Key Areas of Interest

- State of Good Repair
- Pricing
- Housing Policy
- PDA Land Use & Development
- Goods Movement

### Timeline

- Analysis slated for completion in fall 2012
- Results will inform future economic analysis efforts

Unclear that market dynamics will support projected PDA growth – need to assess market feasibility

**BayArea BayArea EARLY INPUT ON**  2

**EIR A**LTERNATIVES

Refine role for public policies to shape market and consumer demands

Identify policies that can support local agencies and ensure feasibility

Study an Environment, Equity, and Jobs Scenario (transit service restoration & affordable housing in jobs-rich communities)

# SB 375 Allows for CEQA Streamlining

### **Residential/Mixed Use Project**

• At least 75% of building square footage is residential use

### Transit Priority Project (TPP)

- At least 50% residential use & minimum of 0.75 floor/area ratio
- Minimum density of 20 units/acre
- Within ½ mile of a major transit stop or high-frequency transit corridor (15 minute headways)





If the proposed residential or mixed use project is consistent with the land use designation, density, intensity, and policies of Plan Bay Area...

BayArea

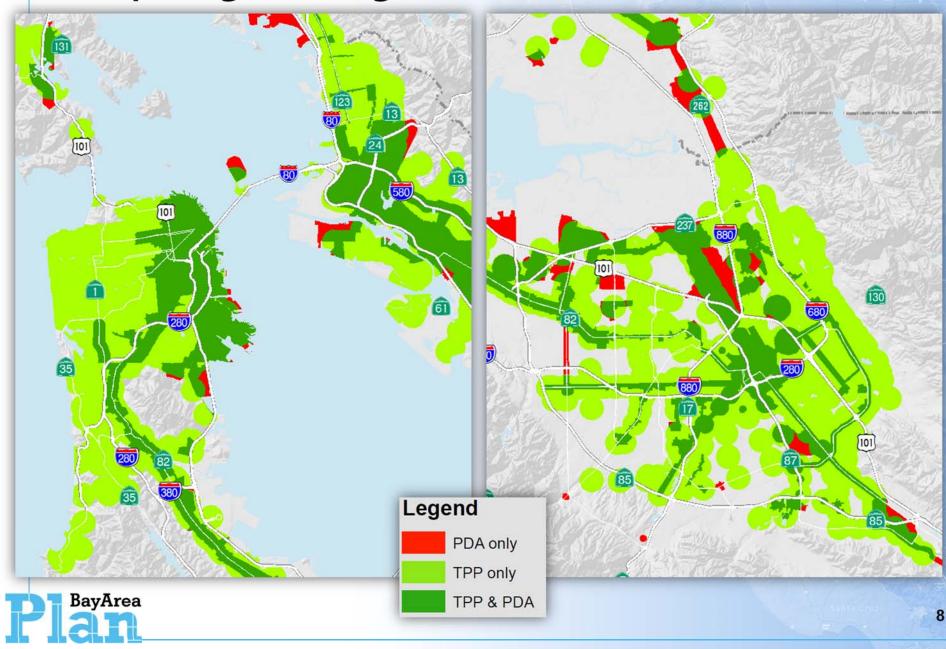
...and if the project is located in a TPP eligible area **and** meets all exemption criteria:

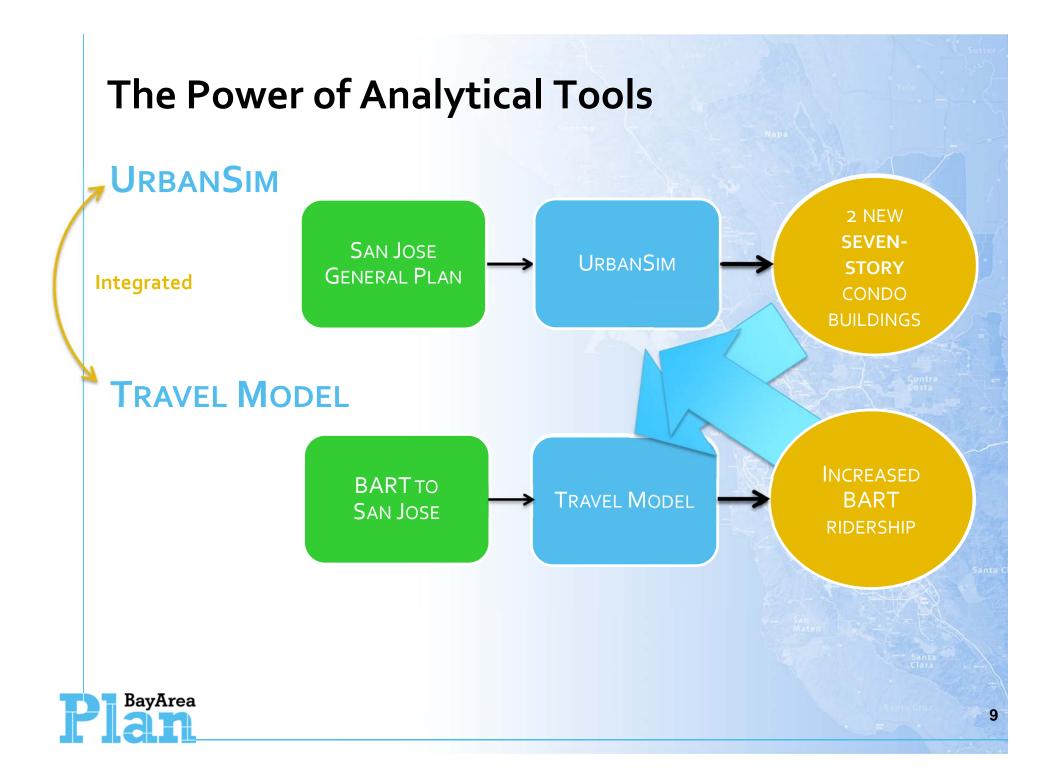
Project is fully exempt from CEQA ...and if the project is located in a TPP eligible area **but** doesn't meet all exemption criteria:

Project qualifies for streamlined environmental review (SCEA) ...and if the project is **not** located in a TPP eligible area:

Project is only eligible for limited CEQA streamlining

# **Comparing TPP Eligible Areas and PDAs**





# **UrbanSim: Policy Toolbox and Market Dynamics**

UrbanSim tests explicit land use policies that attract or constrain development.





# **Defining EIR Alternatives**

#### LAND USE

#### Objectives

- Identify efficient land use pattern that maximizes existing and planned transportation investments
- Support housing choice and diversity
- Improve jobs-housing fit
- Preserve agricultural lands/open space

#### Approach

- Locally adopted General Plans and zoning policies provide the base
- Assess preferred land use strategy (Jobs-Housing Connection)
- Assess various land use policies to consider future growth distribution

#### **TRANSPORTATION**

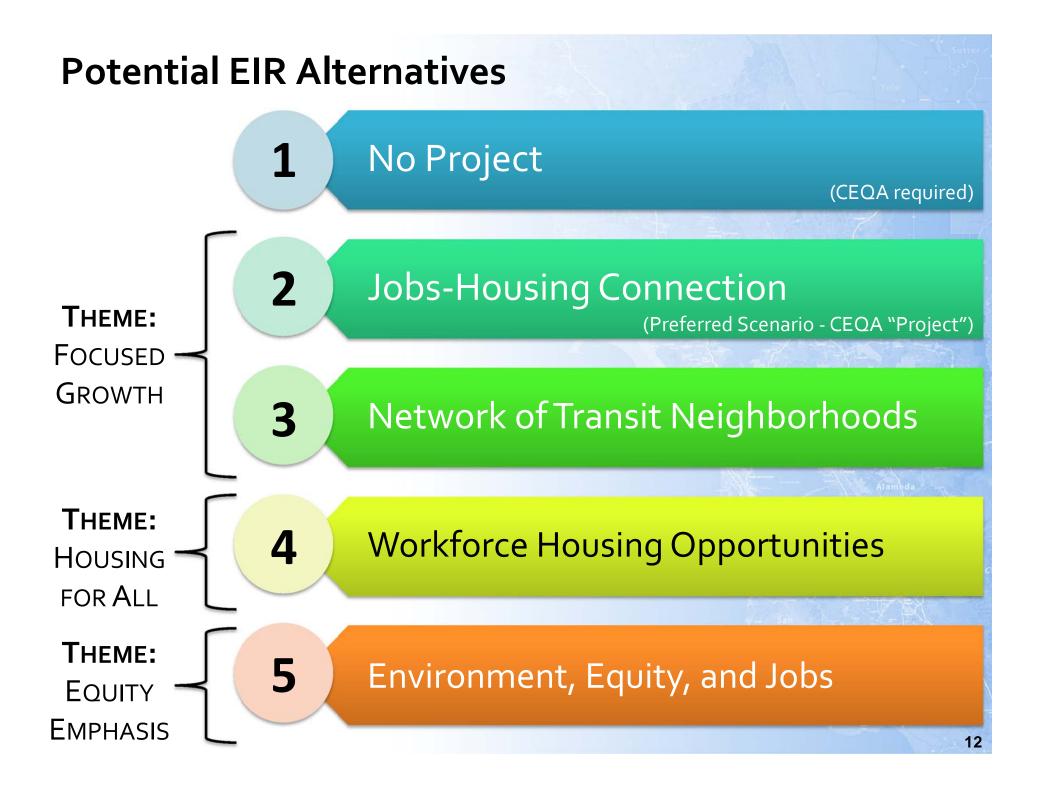
#### Objectives

 Identify financially constrained transportation investment strategy

#### Approach

- Existing transportation network provides the base
- Assess preferred Transportation Investment Strategy, or modify it to reflect shifts in investment priorities
- Assess explicit transportation demand management policies





# No Project

#### (CEQA required)

#### LAND USE

- Base on 2010 existing land use conditions
- Continue existing General Plans and local zoning into the future
- Assume loose compliance with urban growth boundaries -> more greenfield development

#### **TRANSPORTATION**

- Base on 2010 existing transportation network
- Only include projects that have either already received funding and have environmental clearance as of May 1, 2011

# **Jobs-Housing Connection**

(Preferred Scenario - CEQA "Project")

### LAND USE

- Direct 80% of future growth into Priority Development Areas
- Policy measures to be determined

2

#### Preferred Transportation Investment Strategy

**TRANSPORTATION** 

3

# Network of Transit Neighborhoods

#### LAND USE

- Start with No Project land use
- Assess land use mix and density by leveraging policies:

#### **TRANSPORTATION**

Preferred Transportation
 Investment Strategy



# 4

# Workforce Housing Opportunities

#### LAND USE

• Start with Network of Transit Neighborhoods land use

**FEES** 

111

MILLON

- All Bay Area jobs filled by Bay Area workers (i.e. zero in-commuting)
- Further constrain development in outer Bay Area by leveraging policies:

GROWTH

**BOUNDARIES** 

#### **TRANSPORTATION**

• Modified Preferred Transportation Investment Strategy #1:

Transit Comprehensive Operations Analyses (COA) Implementation

Only HOV lane conversions for Express Lanes

Implement pricing policies:

VMT

FEE

Parking Pricing

### Environment, Equity, and Jobs

#### LAND USE

• Start with No Project land use

5

• Provides more affordable housing in high job accessibility locations via the following policies:

#### **TRANSPORTATION**

• Modified Preferred Transportation Investment Strategy #2:

2005 TransitOnlService LevelconRestorationExp

1120 336

Only HOV lane conversions for Express Lanes

UPZONING INCENTIVES FEES

# Redirect Funding to Increase Transit Service for Certain EIR Alternatives

#### **Potential Shifts to Transit Operating**

Project/ Program	Investment Strategy	Possible Shifts		
Transit Capital Replacement	\$8.3 billion	\$2.6 billion		
OBAG	\$14.0 billion	\$2.0 billion		
Regional Express Lanes Network	\$0.6 billion	\$0.3 billion		
Freeway Performance Initiative	\$2.7 billion	\$1.0 billion		
TOTAL	\$25.6 billion	\$5.9 billion		
Shift funding towards EIR alternatives' investment priorities				
BayArea				



# **Key Scoping Questions**

- Are we applying the appropriate policy levers to better encourage sustainable development?
  - Are there missing land use policy or transportation strategies that should be included in the draft alternatives?
- Should we test an entirely different alternative? If yes, what are the land use policy or transportation strategies to be tested?



# **EIR Schedule**

	June 8	Present <b>Draft EIR Alternatives</b> for review by the Joint MTC Planning/ABAG Administrative Committees	
	June 11	Release Notice of Preparation for 30-Day Public Review Period	
	June 20-28	Hold Regionwide Scoping Meetings	
	July 13	Present <b>Final Alternatives</b> for review by Joint MTC Planning/ABAG Administrative Committees and recommendation to Commission and ABAG Executive Board	
	July 19	Commission and ABAG Executive Board Approve Final Alternatives	
	July – December	Prepare Draft EIR	
	December 14	Release <b>Draft EIR and Draft Plan</b> for 45- and 55-Day Public Review Periods by Joint MTC Planning/ABAG Administrative Committees	
	January	Hold Public Hearings on Draft Plan and Draft EIR	
	February – March	Prepare Final EIR (including Response to Comments)	
	April	Commission and ABAG Executive Board Certify <b>Final EIR</b> and Adopt <b>Final Plan</b>	
P	BayArea		



### **Current Regional Plans Scenario - Analysis Results**



### **MTC Planning Committee**

February 9, 2011



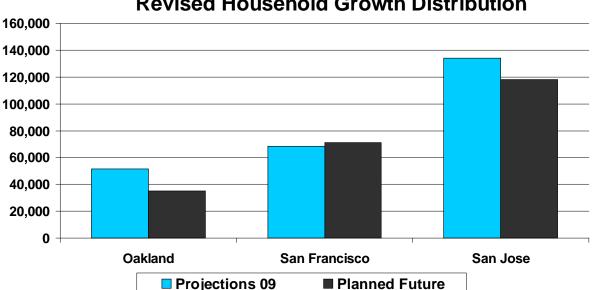
# **Current Regional Plans**

- Updates Projections 2009 forecast
- Starting point for analysis; basis for creation of the Initial Vision Scenario
- Reflects current planning and assumptions
- Not designed to meet the targets
- Won't become the Sustainable Communities Strategy



# **Proj. 2009** Current Regional Plans

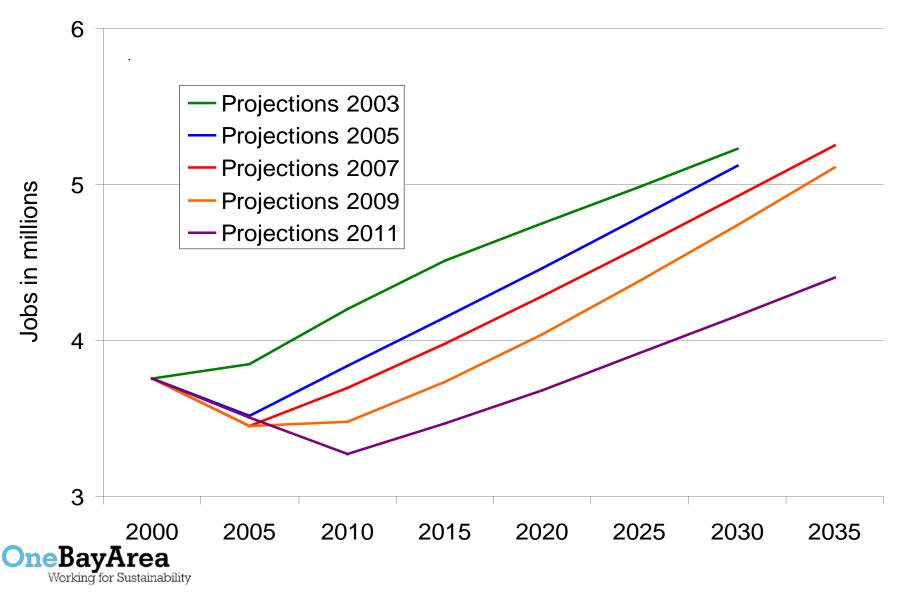
- **Reviewed Projections** 2009 forecast with CMAs & Local Jurisdictions
- Reduced Employment Forecast by 205,000 jobs in 2010 and 707,000 jobs in 2035
- Assumed T2035 Transportation Network and Investments







# **Regional Job Projections**



# **Current Regional Plans vs. Historical Trends**

- Assumes higher rates of housing construction than seen historically (24,000 vs 20,000 annually) but still does not meet the housing target.
- Still results in insufficient affordable housing (historically about 40% of the region's need).
- Continued commuting growth originating outside the region (jobs exceed employed residents by over 300,000 in 2035).

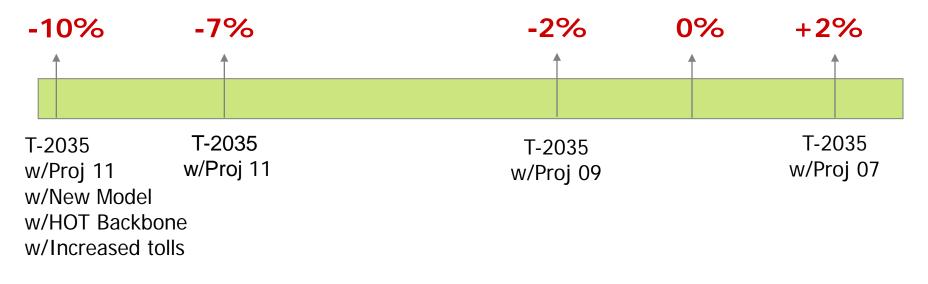


## Revised GHG Emission Reduction Estimates

- Targets recommended by MTC and set by ARB
  - 2020: -7 percent reduction in GHG per capita relative to 2005
  - 2035: -15 percent reduction in GHG per capita relative to 2005
- Four key changes:
  - (1) Higher Bridge tolls were introduced on July 1, 2010 (carpools charged) → less automobile travel
  - (2) Regional HOT network reduced (more financially feasible "backbone") → less automobile travel/more congestion
  - (3) New model more sensitive to changes in transit supply, roadway supply, density, and congestion → less automobile travel
  - (4) Current Regional Plans (Projections 2011)  $\rightarrow$  less travel overall



## Revised GHG Emission Reduction Estimates (% per capita - 2005 vs 2035)



**Increase GHG Reductions per capita** 



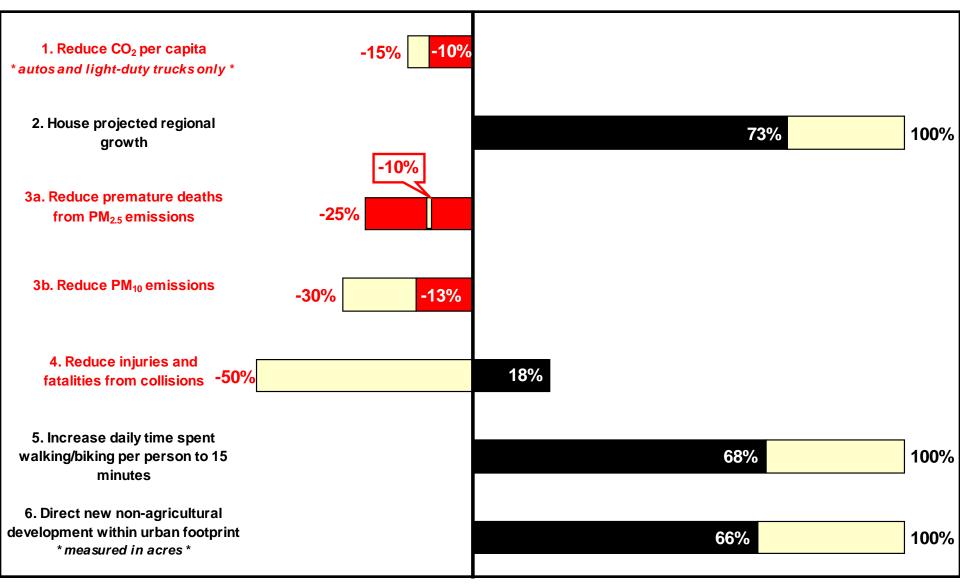
### GHG Targets: ARB vs. Current Regional Plans

(% per capita reduction compared to 2005)

Horizon Year	ARB Target	Current Regional Plans
2020	-7%	-9%
2035	-15%	-10%

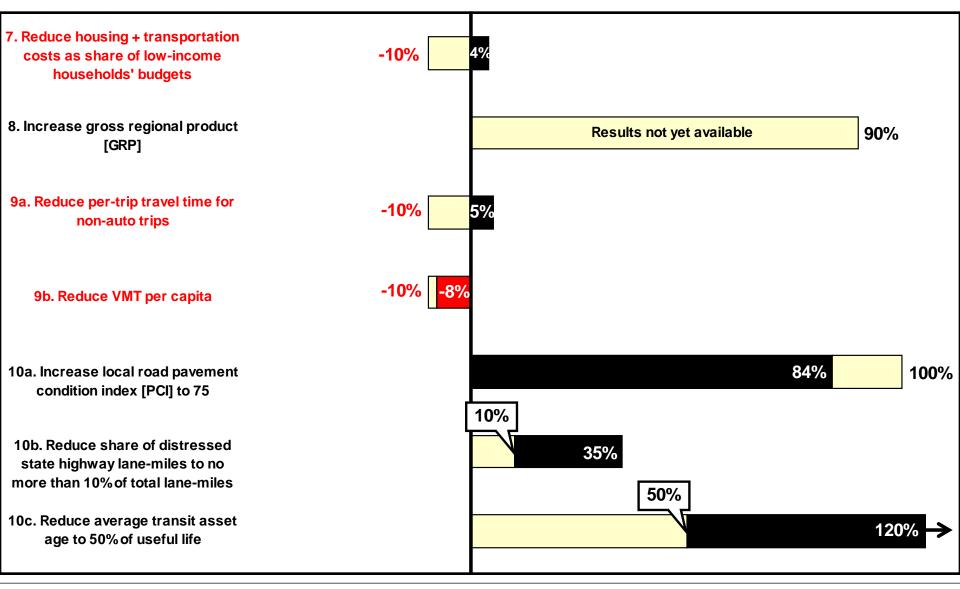


### **Targets Performance - Current Regional Plans (1)**





### **Targets Performance - Current Regional Plans (2)**





# Conclusions

- While we meet the 2020 GHG target, we have a ways to go to meet the 2035 GHG target and other targets
- The prolonged Great Recession is having profound impacts on projected job growth
- The unconstrained Initial Vision Scenario includes more focused growth in urban areas but still may not get us to the GHG and other targets
- Achieving the targets may require greater reliance on non-infrastructure strategies



## Key Next Steps Remaining for This Year

- Initial Vision Scenario March 11, 2011
- Define/Evaluate Detailed SCS scenarios/RTP projects April 2011 to December 2011
- Approve Draft Preferred SCS December 2011
- Release Draft RHNA Plan December 2011



### Performance Targets for the Sustainable Communities Strategy/Regional Transportation Plan

GOAL/OUTCOME	#	<b>RECOMMENDED TARGET</b> Unless noted, all targets are for year 2035 compared to a year 2005 base
CLIMATE PROTECTION	1	Reduce per-capita CO <sub>2</sub> emissions from cars and light-duty trucks by 15% Statutory - Source: California Air Resources Board, as required by SB 375
Adequate Housing	2	House 100% of the region's projected 25-year growth by income level (very-low, low, moderate, above-moderate) without displacing current low-income residents Statutory - Source: ABAG adopted methodology, as required by SB 375
Healthy & Safe Communities	3	<ul> <li>Reduce premature deaths from exposure to particulate emissions:</li> <li>Reduce premature deaths from exposure to fine particulates (PM2.5) by 10%</li> <li>Reduce coarse particulate emissions (PM10) by 30%</li> <li>Achieve greater reductions in highly impacted areas Source: Adapted from federal and state air quality standards by BAAQMD</li> <li>Associated Indicators</li> <li>Incidence of asthma attributable to particulate emissions</li> <li>Diesel particulate emissions</li> </ul>
	4	Reduce by 50% the number of injuries and fatalities from all collisions (including bike and pedestrian) Source: Adapted from California State Highway Strategic Safety Plan
	5	Increase the average daily time walking or biking per person for transportation by 60% (for an average of 15 minutes per person per day) Source: Adapted from U.S. Surgeon General's guidelines
Open Space and Agricultural Preservation	6	<ul> <li>Direct all non-agricultural development within the urban footprint (existing urban development and urban growth boundaries)         <ul> <li>Scenarios will be compared to 2010 urban footprint for analytical purposes only.</li> </ul> </li> <li>Source: Adapted from SB 375</li> </ul>

Performance Targets for the Sustainable Communities Strategy/Regional Transportation Plan Page 2

GOAL/OUTCOME	#	<b>RECOMMENDED TARGET</b> Unless noted, all targets are for year 2035 compared to a year 2005 base
Equitable Access	7	Decrease by 10% the share of low-income and lower-middle income residents' household income consumed by transportation and housing Source: Adapted from Center for Housing Policy
Economic Vitality	8	Increase gross regional product (GRP) by 90% – an average annual growth rate of approximately 2% (in current dollars) Source: Bay Area Business Community
Transportation	9	<ul> <li>Decrease average per-trip travel time by 10% for non-auto modes</li> <li>Decrease automobile vehicle miles traveled per capita by 10% Source: Adapted from Caltrans Smart Mobility 2010</li> </ul>
System Effectiveness	10	<ul> <li>Maintain the transportation system in a state of good repair:</li> <li>Increase local road pavement condition index (PCI) to 75 or better</li> <li>Decrease distressed lane-miles of state highways to less than 10% of total lane-miles</li> <li>Reduce average transit asset age to 50% of useful life Source: Regional and state plans</li> </ul>

#### WHAT ARE THE TARGETS AND HOW ARE THEY MEASURED?

#### 1. Reduce per-capita CO2 emissions from cars and lightduty trucks by 15%

SB 375 requires the California Air Resources Board (CARB) to set targets for reducing emissions from cars and light-duty trucks. CARB adopted this target for use in Plan Bay Area; the target results are based on a measurement of pounds of carbon dioxide emissions from passenger vehicles for a typical weekday, on a per-person basis.

#### 2. House 100% of the region's projected 25-year growth by income level (very-low, low, moderate, above-moderate) without displacing current low-income residents

SB 375 requires regions to plan for housing all projected population growth, by income level, to prevent growth in in-commuting. This target's results reflect the percentage of year 2035 total housing demand that can be accommodated in the nine-county Bay Area. Only the first two scenarios are able to meet this target, as they assumed higher in-region population levels. In the other three scenarios, some households must live outside the Bay Area (particularly in the San Joaquin County) and commute into the region for employment.

#### **3a. Reduce premature deaths from exposure to fine** particulates (PM2.5) by 10%

The Bay Area currently does not meet the federal standard for fine particulate matter, which is extremely hazardous to health. The targeted reduction for PM2.5 reflects the expected benefit from meeting the federal standard. This target's performance was assessed by Bay Area Air Quality Management District (BAAQMD) staff; their analysis considers the impacts of fine particulate (PM2.5) emissions, as well as NOx emissions that produce secondary PM2.5. Note that all direct PM2.5 emissions from vehicles were considered, but road dust and brake/tire wear were not included

#### 3b. Reduce coarse particulate emissions (PM10) by 30%

The Bay Area currently does not attain the state standard for coarse particulate matter. The targeted reduction for PM10 is consistent with the reduction needed to meet the state standard and achieve key health benefits. The target results reflect tailpipe emissions and road dust from all vehicles, but do not include coarse particulates from brake and tire wear.

#### 3c. Achieve greater particulate emission reductions in highly impacted areas

A "Yes" rating for this target means that highly impacted areas achieve greater reductions in particulate emissions than the rest of the region. The target assessment identified CARE communities as "highly impacted areas"; CARE communities are defined by BAAOMD as lower-income communities in the Bay Area with high levels of particulate emissions from roads and ports.

#### 4. Reduce by 50% the number of injuries and fatalities from all collisions (including bike and pedestrian)

This target is adapted from the State's 2006 Strategic Highway Safety Plan and reflects core goals of improving safety and reducing driving. The target measures the total number of individuals injured or killed in traffic collisions, regardless of transport mode.

#### 5. Increase the average daily time walking or biking per person for transportation by 70% (for an average of 15 minutes per person per day)

This target relates directly to U.S. Surgeon General's guidelines on physical activity, for the purposes of lowering risk of chronic disease and increasing life expectancy. The target results are based on the average time spent walking or biking on a typical weekday, only for transportation purposes (i.e. does not include recreational walking or bikina).

#### 6. Direct all non-agricultural development (100%) within the urban footprint (existing urban development and urban growth boundaries)

SB 375 requires consideration of open space and natural resource protection, which supports accommodating new housing and commercial development within existing areas of urban growth. The intent of this target is to support infill development while protecting the Bay Area's agriculture and open space lands. By focusing on areas with existing urban development, as well as areas specifically selected for future growth by local governments, the target seeks

to avoid both excess sprawl and elimination of key resource lands. The target results are based on the percentage of total housing units located within the year 2010 urban footprint (defined as existing areas of development, as well as areas within existing urban growth boundaries).

#### 7. Decrease by 10% the share of low-income and lowermiddle income residents' household income consumed by transportation and housing

This target aims to bring Bay Area housing and transportation costs in line with the national average, as the region's costs are currently significantly higher than the rest of the country. The target focuses on cost impacts for low-income and lower-middle income residents (with household income less than \$60,000 in year 2000 dollars).

#### 8. Increase gross regional product (GRP) by 90% - an average annual growth rate of approximately 2% (in current dollars)

This target is a key indication of the region's commitment to advance Plan Bay Area in a manner that supports economic growth and competitiveness. Growth patterns and transportation investments in the scenarios affect travel time, cost and reliability. The Plan Bay Area Economic Impact Assessment, developed by consultant Cambridge Systematics, reflects on the cost of on-the-clock travel and access to labor, suppliers, and markets. Any resulting increases in productivity make the region more competitive for attracting new businesses and jobs; this increases employment and wages, which are also reflected in the GRP target.

#### 9a. Increase non-auto mode share by 10%

Mode share can be interpreted as the percent of trips made by a particular travel mode (walk, bike, drive, etc.); this target reflects the Plan Bay Area goal of reducing trips made using automobiles. The target benefits from service and infrastructure improvements for the transit, bicycle, and pedestrian networks. The numeric target shown in the table reflects the resulting 10% mode share increase from the forecasted 2005 non-auto mode share of 16%. This updated target language has been proposed to replace the previously adopted non-auto travel time reduction target.

#### 9b. Decrease automobile vehicle miles traveled per capita by 10%

Vehicle miles traveled (VMT) per capita reflect both the total number of auto trips and the average distance of auto trips; this target would be supported by increased transit service, more opportunities for active transportation, and reduced travel distances between origins and destinations. Given significant traffic congestion in the region, it is critical to reduce VMT per person. The target results are based on model output for total auto vehicle miles traveled and are adjusted based on the total population for the relevant scenario.

#### 10a. Increase local road pavement condition index (PCI) to 75 or better

The Pavement Condition Index (PCI) reflects the quality of the roadway surface - the more cracks and potholes form, the lower the Pavement Condition Index. The target reflects a goal of reaching a state of good repair on local roadways, which form the backbone of the transportation network in Priority Development Areas (i.e. key areas for focused growth in the Plan).

#### 10b. Decrease distressed lane-miles of state highways to less than 10% of total lane-miles

This target's performance is based on anticipated state funding for highway maintenance. The region must maintain the existing highway infrastructure in order to support the goals of Plan Bay Area.

#### 10c. Reduce share of transit assets exceeding their useful life to 0%

This target reflects a goal of replacing all transit assets on-time (i.e. at the end of their useful life); failure to do so would result in unreliable transit service. As frequent, reliable transit service is critical to support focused growth, this target reflects the need to maintain existing transit service in a state of good repair. This updated target language has been proposed to replace the previously adopted average transit asset age target.



### HOW WERE THE SCENARIOS DEFINED AND HOW DO THEY DIFFER?

In June 2011, MTC and ABAG approved five alternative Plan Bay Area land use and transportation scenarios for evaluation and testing to demonstrate how the region might achieve a set of performance targets for the environment, the economy and social equity (see inside for details).

These scenarios place varying degrees of growth in Priority Development Areas (PDAs), which are defined as land near public transit that local officials have determined to be most suitable for development. Likewise, the scenarios recognize Priority Conservation Areas, places local officials have deemed worth keeping undeveloped for farm land, parks or open space. The first two scenarios assume stronger economic growth and financial resources, along with a higher level of housing growth to meet forecasted demand. The remaining three scenarios fall somewhat short of meeting future housing demand but reflect input received from local jurisdictions on the level of growth they think can reasonably be accommodated.

SCENARIOS	LAND USE PATTERN	TRANSPORTATION NETWORK
Initial Vision	Housing and job growth is concentrated in the PDAs, based on local land use priorities, available transit service, and access to jobs. The scanario is based on input from local jurisdictions on the level of growth they can reasonably accommodate given resources, local plans, and community support. 70 percent of the housing would be accommodated in PDAs. More than half of job growth is expected to occur in the region's 10 largest cities.	Transportation 2035 Plan Network – Investment strategy in MTC's adopted long-range transportation plan.
2 Core Concentration	Housing and job growth is concentrated in locations that are served by frequent transit services and within a 45-minute transit commute of Oakland, San Francisco, and San Jose. Also identifies several "game changers," or places with capacity for a high level of growth if coupled with supportive policies and resources. These areas include the Tasman Corridor in Santa Clara County, lands east of Oakland Airport to the Coliseum, the Concord Naval Weapons Station, and the San Francisco Eastern Waterfront, among others. Overall, 72 percent of the housing and 61 percent of the job growth is expected within the PDAs.	<b>Core Capacity Transit</b> <b>Network</b> – Increases transit service frequency along the core transit network
Focused Growth	Distributes growth most evenly throughout the region's transit corridors and job centers, focusing most household and job growth within the PDAs. 70 percent of the housing production and around 55 percent of the employment growth would be accommodated within PDAs. Provides more housing near transit stations and more local services in existing downtown areas and neighborhood centers.	Core Capacity Transit Network – See description above.
Constrained Core Concentration	Places more household and job growth in those PDAs situated along several transit corridors ringing the Bay in San Francisco, San Mateo and Santa Clara counties, and in portions of Alameda and Contra Costa counties. Some 79 percent of the housing production and 58 percent of the employment growth would be accommodated within PDAs. By concentrating more growth in the major downtowns and along key transit corridors, this scenario goes even further than the Focused Growth scenario in trying to maximize the use of the core transit network and provide access to jobs and services to most of the population.	Core Capacity Transit Network – See description above.
<b>5</b> Outward Growth	Closer to recent development trends, places more growth in the cities and PDAs in the inland areas away from the Bay than those considered in the Focused Growth or the Constrained Core Concentration scenarios. Most housing and employment growth would still be accommodated in areas closest to the Bay, but with clusters of jobs and housing in key transit-served locations in the inland areas away from the Bay. Some 67 percent of housing production and 53 percent of employment growth would be in PDAs. While increased use of public transit would be limited in inland areas, some shorter commutes could be expected as jobs are created closer to residential communities.	Transportation 2035 Plan Network – See description above.

# **SCENARIO ANALYSIS**

# Plan TARGETS SCORECARD

Scenarios were															
assessed to determine their	CLIMATE PROTECTION	ADEQUATE HOUSING						OPEN SPACE & AGRICULTURAL	EQUITABLE ACCESS	ECONOMIC VITALITY	TRANSPORTATION SYSTEM EFFECTIVENESS				
impacts on the Bay Area. This table shows how each scenario					Ĭi		PRESERVATION								
performs with regard to the adopted Plan Bay Area performance targets.	<b>1</b> Reduce CO <sub>2</sub> emissions per person from cars and light- duty trucks	2 House projected regional growth	3a Reduce premature deaths from exposure to fine particulate emissions	3b Reduce coarse particulate emissions	<b>3</b> C Achieve greater particulate emissions reduction in highly- impacted areas	4 Reduce injuries and fatalities from all collisions	5 Increase the average daily time walking or biking per person	<b>b</b> <b>b</b> <b>i</b> <b>r</b> <b>e</b> <b>v</b> <b>r</b> <b>v</b> <b>r</b> <b>r</b> <b>r</b> <b>r</b> <b>r</b> <b>r</b> <b>r</b> <b>r</b> <b>r</b> <b>r</b>	<b>7</b> Reduce housing and transporta- tion costs as share of low-income households' budgets	8 Increase Gross Regional Product (GRP)	9a <sup>**</sup> Increase non-auto mode share	9b Reduce vehicle miles traveled (VMT) per person	10a Improve local road pavement condition index (PCI)	Reduce share of distressed state highway lane-miles	Reduce share of transit assets exceeding their useful life
NUMERIC GOALS*	-15%	100%	-10%	-30%	Yes	-50% º	+70%	100%	- <b>10%</b>	+90%	26%	-10%	+19%	-63%	-100%
SCENARIOS V	-15% $\longleftrightarrow$ 0	0 ↔ 100%	-40% -> 0	-30% -> 0		-50%⇔+50%	$0 \longleftrightarrow 70\%$	0 ↔ 100%	-10%↔+10%	0↔+140%	0←→26%	-10%	0←→+19%	-63%+63%	-150% +150%
Initial Vision	-8%	100%	-23%	-6%		+26%	+15%	98%	-4%	131%	19%	-6%	+5%	+30%	+138%
2 Core Concentration	-8%	100%	-27%	-9%		+23%	+20%	92%	+8%	134%	20%	-6%	+5%	+30%	+138%
Focused Growth	-9%	98%	-32%	-13%		+19%	+14%	92%	+9%	113%	19%	-6%	+5%	+30%	+138%
Constrained Core Concentration	-9%	98%	-32%	-13%		+18%	+15%	92%	+9%	113%	19%	-7%	+5%	+30%	+138%
5 Outward Growth	-8%	98%	-31%	-11%		+20%	+10%	90%	+9%	113%	18%	-5%	+5%	+30%	+138%

\* Percent changes reflect differences between 2005 and 2035 conditions.

\*\* Alternate target used.

Target results shown with white stripes signify that result is going in the wrong direction with respect to the adopted target.

#### DECEMBER 2011



METROPOLITAN TRANSPORTATION COMMISSION Joseph P. Bort MetroCenter 101 Eighth Street Oakland, CA 94607-4700 TEL 510.817.5700 TDD/TTY 510.817.5769 FAX 510.817.5848 E-MAIL info@mtc.ca.gov WEB www.mtc.ca.gov

### Memorandum

TO: MTC Planning Committee

FR: Deputy Executive Director, Policy

RE: Planned Future (Projections 2011/Transportation 2035 Plan) Results

As discussed at your last meeting, staff is in the process of updating ABAG's adopted Projections 2009, which forecasts jobs and employment over the next 25 years. Using the performance targets adopted by the Commission last month, these updated Projections 2011, along with the transportation investments included in MTC's Transportation 2035 plan, will provide the "Planned Future" for comparing performance with the Initial Vision Scenario to be released in March and the detailed SCS Scenarios later this year.

Staff will provide detailed information at your meeting on the term "Planned Future" and how it measures up against the Commission's adopted performance targets.

Ann Flemer

AF: DO J:\COMMITTE\Planning Committee\2011\Feb 011\2\_Draft\_First\_Round\_SCS\_Results.doc

### DATE: February 2, 2011

### How Do the Indicators Relate to the Sustainable Communities Strategy?

#### 1. Job Density

The Sustainable Communities Strategy forecasts the location of both future housing and future jobs. The scenarios show a substantial increase in the proximity of jobs to housing. Housing growth in job-rich areas increases accessibility, benefitting both the economy and the environment.

#### 2. Concentrations of Poverty

A primary objective of the Sustainable Communities Strategy is to ensure housing affordability and supply for Bay Area residents of income levels, while reducing concentrations of poverty and maximizing livability. ABAG and MTC are currently working to reduce concentrations of poverty by aligning the SCS with the Regional Housing Needs Allocation (RHNA). An awareness of those areas in the region in which concentrations of poverty currently exist will inform regional agencies in decisions regarding the allocation of housing of various levels of affordability, and will indicate which communities may need extra support to maximize livability.

#### 3. Housing Tenure

In areas that are primarily rental housing, changes in the real estate market can significantly impact residents and increase evictions and population displacement. However, displacement can also result from a lack of new development and housing opportunities in an attractive neighborhood with many of the amenities associated with sustainable development: jobs, transit, parks, and good schools. High rental percentages are therefore not a negative indicator, but may indicate the need for increased efforts to engage residents and improve neighborhood stability.

#### 4. Housing Density

The number of housing units per acre in the region is a measurement of residential density. A key SCS goal is to focus growth in already urbanized areas, and to encourage sustainable communities by avoiding development outside of the existing urban footprint. This development pattern represents a more efficient use of land by utilizing existing infrastructure, and can also achieve other SCS goals: the reduction of housing and transportation costs for residents and increasing access to resources and amenities.

#### 5. New deed-restricted affordable housing units

Ensuring housing affordability and supply for individuals of all income levels is a primary goal of the Sustainable Communities Strategy, and deed restrictions are an indicator of a more stable supply of affordable homes. Lack of affordable housing can result in either less-desirable living situations such as over-crowding, or can push people to find less expensive housing in outlying areas further from their places of employment. The resulting commutes counter the sustainability goals of the SCS, and limit workers' abilities to contribute to and benefit from diverse 'Complete Communities.' This indicator is also related to housing tenure and concentrations of poverty.

#### 6. Race

Communities of color have faced disproportionate burdens related to poverty and air quality which should be addressed through the SCS. Regional agencies use US Census data regarding population concentration by race in the process of developing the SCS to analyze whether the benefits and burdens of new development and transit are equitably distributed or privilege one demographic group over another. An understanding of current population concentrations by race is also necessary to plan for and monitor an SCS that supports equal access to opportunity in the region.

#### 7. School Quality

Quality childhood education is one of the most important resources to residents of the region, and successful schools add immensely to the vibrancy of the surrounding community. Attracting growth to Bay Area neighborhoods and retaining the talent of young families depends upon high quality schools in key locations for future development. An understanding of where high and low performing schools are located will instruct the development of a Sustainable Communities Strategy that supports livable neighborhoods throughout the Bay Area.

#### 8. Resource Areas

If the region's employment and population are growing while natural habitats and resources are sustained, this indicates that development is following in-fill patterns by adapting or re-using already-urbanized lands instead of expanding into natural areas. This indicator is calculated at a large census tract geography, so growth in areas with critical habitat and farmland may not be a threat to those areas.

#### 9. VMT Per Capita

Vehicle miles traveled (VMT) per capita is a measure of the average number of miles driven per person in the Bay Area during one year. This includes both commute trips and non-work related travel, such as goods movement, travel to services and amenities, and tourism. The SCS' objective to develop Priority Development Areas as complete communities, and to encourage growth in areas throughout the region that include housing, employment, services and high-quality transit, should result in decreased VMT per capita. While growth in low VMT per capita areas will help achieve SCS goals, helping other areas reduce VMT is equally important.

#### 10.Walkability

Walkability refers to the desirability, safety, and convenience of accessing services, amenities and employment as a pedestrian. The walkability of neighborhoods throughout the Bay Area is a crucial component of supporting numerous goals of the SCS, including reducing transportation costs and improving public health and safety for residents. This indicator measures the number of destinations, such as schools, parks, and businesses, within walking distance. Those areas that are walkable and could support more housing or employment are good locations for growth, while areas that are not safe or welcoming for pedestrians should be improved.

#### 11. Transit

The Sustainable Communities Strategy objective of increasing transit access has economic, environmental, and equitable significance. Providing the benefits of transportation to all groups across the region is vital to a sustainable and vibrant region, allowing all people ease of access to work and services is crucial to a thriving economy, and the opportunity to take transit rather than drive benefits the environment.

#### 12.Crime

Bay Area communities will not be able to achieve goals of quality neighborhoods that are pedestrian and bicycle friendly and in which businesses thrive without addressing issues of crime and fear of violence. Crime data is reported nationally for cities overall and by size of population. Design techniques such as the use of walkways, landscape and lighting, as well as incorporating a mix of commercial and residential building types, can encourage continuous use and reduce criminal activity.

#### 13. Pedestrian/Bicycle Safety

A reduction in fatal and injury collisions is crucial to the goal of the SCS to promote increased quality of life via healthier and safer communities. Improving neighborhood safety by reducing collisions improves public health, both directly by reducing injuries and also indirectly by encouraging residents to use walking and biking as a means of transportation, which improves health outcomes.

# **Plan REGIONAL INDICATORS**

Plan Bay Area Indicators are snapshots of current regional characteristics, including housing, jobs, demographics, farmland, schools, crime, and "walkability" (how easy it is to walk to local businesses and services.) These quality-of-life factors can have a big impact on future growth and individual and household choices in the year 2040.

Each indicator is mapped and then compared geographically to future growth projections for households and jobs. The summary table shows how closely aligned each indicator is with regional growth in four alternative scenarios: Revised Vision Scenario, Focused Growth, Core Growth and Outward Growth. While the variation between the alternative scenarios for each indicator is relatively small, the indicators vary substantially in terms of their potential impact on our future growth pattern. For example, future job distributions closely follow current job locations, with the majority of new job



growth occurring in locations is in areas that already have an above-average density of jobs. Little growth is anticipated in areas

it with prime farmland or critical habitats (5-7%) or areas with a high number of traffic collisions (1-2%).

The indicators suggest policies and strategies that the SCS may want to address to

- ed maximize the potential benefits of new transportation investments and land use
- le development. Initial analysis has revealed the following high priority issues:
  - 1. Reducing auto-related injuries and increasing walkability.
  - Improving school performance in growth areas.
  - Preserving and increasing affordable housing in growth areas.

A full set of Indicator Maps is available at http://onebayarea.org/plan\_bay\_area/ targets.htm

# **Plan REGIONAL INDICATORS**

INDICATORS V

Scenarios were	INDICATO												
assessed to determine how													PEDESTRIAN/
future development	JOB	DOVEDTV	HOUSING	HOUSING		DAGE	SCHOOL	RESOURCE	VMT	TRANCIT		CDINE	BICYCLE
might relate to	DENSITY	POVERTY	TENURE	DENSITY	AFFORDABILITY	RACE	QUALITY	AREAS	PER CAPITA	TRANSIT	WALKABILITY	CRIME	SAFETY
current conditions.	Percent of New Housing	Percent of New	Percent of New	Percent of New	Percent of New	Percent of New	Percent of New	Percent of New	Percent of New	Percent of New	Percent of New	Percent of New	Percent of New
This table shows	Growth in	Household	Household	Household	Household	Household	Household	Household	Household	Household	Household	Household	Household
how each scenario	areas with	Growth in	Growth	Growth in	Growth	Growth in	Growth in	Growth	Growth in	Growth in	Growth	Growth in	Growth in
performs with	existing job densities	areas with high Poverty	in Census Tracts that	areas with existing	in areas where more	areas that are Majority	areas with a mean School	in areas with Prime	areas with	areas with	areas that	areas with Highest	areas with historically
regard to a set of	above 5 jobs	Concentration	are Majority	housing	than 8% of	People	API less than	Farmland	lowest current VMT per	highest access to	are currently considered	Violent Crime	high fatal or
	per acre	(greater than	Rental	densities	housing stock	of Color	800 (CA State	or Critical	Capita (10	Frequent	Walkable (6+	rates (800+	severe injury
	(Mean Job Density = 5.)	30% double national		above 6 units/	is Deed- Restricted	(greater than 70%).	standard.)	Habitat	miles or less per day.)	Transit (20 minutes or	Businesses within one	annual per 100,000 pop.)	collisions (per 100 people).
to equity, the	Density $=$ 5.)	poverty rate.)		acre (Mean	Affordable	ulali 70%).			per uay.)	less)	mile)	100,000 pop.)	100 people).
economy, and the environment.		, , ,		Housing	Housing					,	,		
environment.				Density = 6)									
SCENARIOS <b>V</b>	<b>25%</b> ↔ <b>75%</b>	$0\% \longleftrightarrow 50\%$	25% ↔ 60%	25% ↔ 50%	<b>0%</b> ←→ <b>30%</b>	$0\% \longleftrightarrow 40\%$	40% ↔ 60%	$0\% \longleftrightarrow 10\%$	0% ↔ 20%	10% ↔25%	15% ↔25%	10%	0%↔5%
Existing Conditions	36%	25%	36%	40%	22%	24%	42%	7%	11%	13%	17%	11%	2%
Core	620/	2007	F00/	470/	250/	270/	FF0(	50/	170/	220/	220/	120/	20/
Concentration	62%	38%	50%	47%	25%	37%	55%	5%	17%	23%	22%	12%	2%
<b>Focused</b>	61%	37%	47%	41%	24%	32%	55%	5%	18%	21%	22%	12%	1%
<b>Growth</b>		5770	4770	41 /0	2470	52 /0	5576	5 76	10 /0	21 /0	22 /0	1270	170
Constrained Core	67%	39%	51%	45%	27%	34%	56%	5%	20%	24%	24%	12%	1%
Concentration													
<b>Outward</b> Growth	56%	34%	43%	37%	21%	29%	54%	7%	15%	19%	21%	11%	2%
Growth													
												-	

#### DECEMBER 2011

 From:
 eircomments

 To:
 Karen Kidwell

 Date:
 7/10/2012 3:28 PM

 Subject:
 Re:

Thank you for your comments; they will be considered carefully during the preparation of the Plan Bay Area Environmental Impact Report (EIR). To stay updated on Plan Bay Area and the environmental process, please visit www.onebayarea.org.

Ashley Nguyen, EIR Project Manager Metropolitan Transportation Commission 101 8th Street Oakland, CA 94607 (510) 817-5809

>>> Karen Kidwell <<u>karen@openspacecouncil.org</u>> 7/10/2012 1:45 PM >>> Please accept this letter from the Bay Area Open Space Council on the EIR for Plan Bay Area.

Karen Kidwell Interim Executive Director Bay Area Open Space Council 510-809-8009 x 254

\_\_\_



July 10, 2012

Ashley Nguyen, EIR Manager Metropolitan Transportation Commission 101 Eighth Street

Dear Ms. Nguyen,

The Bay Area Open Space Council is a collaborative of member organizations actively involved in permanently protecting and stewarding important parks, trails and agricultural lands in the ten-county San Francisco Bay Area. We are pleased to comment on the EIR Scoping for Plan Bay Area. As the Metropolitan Transportation Commission (MTC) and the Association of Bay Area Governments (ABAG) move forward with the Play Bay Area effort and prepare to invest more than \$250 billion into our economy over the next 25 years, it is critical that the protection and enhancement of vital natural resource areas in the region be addressed.

The protection and stewardship of open space, natural resource lands and farmland in the regional Plan Bay Area efforts is an important tool to reduce greenhouse gasses and support a holistic approach to transportation and land use planning.

In preparing the draft EIR for transportation and land use developments in the Bay Area, it will be critical to fully mitigate for significant adverse impacts on parks, open space, and farmland. Mitigation measures also need to acknowledge and include the role that natural resource areas and open space conservation play in mitigating adverse impacts from transportation and land use developments. These include:

- Carbon sequestration, especially of tidal marsh and coniferous forest and properly managed grasslands;
- Greenhouse gas reduction through trip reduction
- Health benefits getting people out of their cars
- Protection of Wildlife Habitat, Migration Corridors and Linkages
- Preservation of Endangered Species Habitats
- Restoration of Habitats to mitigate for development
- Attenuation of Noise and Light through open space buffers
- Preservation of Scenic Open Space enhancing property values
- Protecting and enhancing Water Quality
- Recreation opportunities
- Creation of Jobs in Conservation
- Keeping Agriculture viable
- Preventing development of Seismically Unstable areas

Financial incentives for protecting natural areas that are required by SB375 also need to be included as mitigation measures, and mitigation measures also need to address any conflicts with adopted City, County and Regional Open Space Plans and Elements.

Thank you for your work to create a plan for a thriving and sustainable Bay Area, and for the opportunity to share our comments.

Sincerely yours,

andrea mælengie

Andrea Mackenzie Chair, Executive Committee

From:	eircomments
To:	Sandi Galvez
Date:	7/11/2012 5:35 PM
Subject:	Re: BARHII DEIR Scoping Comments

Thank you for your comments; they will be considered carefully during the preparation of the Plan Bay Area Environmental Impact Report (EIR). To stay updated on Plan Bay Area and the environmental process, please visit <u>www.onebayarea.org</u>.

Ashley Nguyen, EIR Project Manager Metropolitan Transportation Commission 101 8th Street Oakland, CA 94607 (510) 817-5809

>>> "Sandi Galvez" <<u>sgalvez@phi.org</u>> 7/11/2012 5:20 PM >>> Hi Ashley:

Attached you will find our comments.

Thanks, Sandi Galvez



#### 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

July 11, 2012

#### VIA ELECTRONIC MAIL (eircomments@mtc.ca.gov)

Ashley Nguyen, EIR Project Manager Metropolitan Transportation Commission (MTC) Joseph P. Bort MetroCenter 101 8th Street Oakland CA 94607

#### **RE: Scoping Comments for Plan Bay Area EIR**

Dear Ms. Nguyen:

I represent the Bay Area Regional Health Inequities Initiative (BARHII), a collaborative of the eleven Bay Area Public Health Departments that plan and work together to achieve more equitable health outcomes in our region. We have welcomed the opportunity to partner with our regional planning agencies to help further the dialogue on how our region's plan to reduce green house gas emissions can also make significant contributions towards improving equitable health outcomes for our residents. We are providing the following recommendations for what should be studied in the EIR to help further health equity goals:

# **1.** The DEIR should analyze and address the distribution of environmental impacts across all communities, including low-income people and people of color, to ensure that the benefits and burdens of Plan Bay Area are fairly distributed.

The Plan Bay Area DEIR should explicitly analyze and address mitigations for impacts that disproportionately affect low-income people and people of color in the Bay Area. This includes the impacts, disaggregated by race and income, related to inequitable access to transit, high transportation and housing cost burdens, lack of affordable housing, risk of direct and indirect displacement, and other public health factors (including those related to air quality, access to active transportation, and related chronic diseases).

Analyze each alternative to determine whether it provides adequate workforce housing for all economic groups, particularly low wage workers who would most likely walk, bike, or take local transit to work. Additionally, each alternative should look at how well it meets a jobs-housing fit and select the alternative that best accommodates the region's work force at all wage-levels. Lastly, mitigation measures should be adopted to improve jobs-housing fit, particularly in affluent communities with the highest proportion of low-income in-commuters in the region.

#### 2. Conduct a Health Impact Assessment to study the health impacts of the proposed project.

This assessment\_should, at a minimum, consider the public health effects related to transit reliability, accessibility, and affordability (i.e. safety, mental health, heat exhaustion); availability and placement of affordable housing (e.g. increased risk of cancer, lung disease, and cardiovascular disease; increased prevalence of asthma and asthma attacks; loss of sleep; the health impacts from noise and vibration; and mental health impacts); and displacement risk. Ensure that adequate mitigations are put in place for any significant health impacts found in this assessment.

#### 3. Study the Equity, Environment and Jobs (EEJ) Scenario as one of the DEIR alternatives.

The EEJ alternative should study the benefits of reducing displacement and bringing low-wage jobs, affordable housing and improved local transit together.

We will continue to participate in discussions about Plan Bay Area in the upcoming months and look forward to seeing our comments addressed in the DEIR and later in the Final EIR.

Thank you for your consideration,

Sandi Galvez, MSW BARHII Executive Director sgalvez@phi.org (510) 302-3369



Making San Francisco Bay Better

July 19, 2012

Ashley Nguyen Metropolitan Transportation Commission 101 8<sup>th</sup> Street Oakland, California 94607

### SUBJECT: BCDC Planning Subject File, Sustainable Communities Strategy, Notice of Preparation of a Draft Environmental Impact Report for Plan Bay Area, SCH# 2012062029

#### Dear Ms. Nguyen:

Thank you for the opportunity to comment on the Notice of Preparation (NOP) of a Draft Environmental Impact Report (EIR) for Plan Bay Area SCH# 2012062029, dated June 11, 2012 and received in our office on June 13, 2012. Although the Commission has not had an opportunity to review the NOP, the following staff comments are based on the Commission's law, the McAteer-Petris Act, the *San Francisco Bay Plan*, and staff review of the proposals in Plan Bay Area.

As a member of the Joint Policy Committee, the Commission and its staff have provided ongoing input to the formulation of Plan Bay Area. We have appreciated the collaborative approach taken by the Metropolitan Transportation Commission (MTC) and Association of Bay Area Governments (ABAG) staffs during the formulation of Plan Bay Area, the region's first sustainable communities strategy (SCS). Overall, the proposed SCS appears to be generally consistent with the Commission's management program for San Francisco Bay. At recent Commission briefings on the SCS, the Commission and ABAG and MTC staff have discussed both land use consistency with Bay Plan priority use designations and proposed priority development areas (PDA's) and how to address sea level rise in the EIR for the SCS.

The Commission recently adopted new climate change policies, which apply to PDA development within the Commission's jurisdiction. These policies encourage infill development, and allow the Commission to authorize Bay fill for shoreline protection to prevent flooding. Also, any required public access must be designed and maintained to avoid flood damage due to sea level rise and storms and must either remain viable in the event of future sea level rise or flooding, or equivalent access consistent with the project must be provided nearby.

An analysis of which PDAs and transportation investments are vulnerable and which have a viable strategy for addressing sea level rise and storms will assist all regional agency staff in planning and funding evaluations. To be comprehensive, the land use analysis should consider existing uses, communities of concern and potential exposure to other hazards, such as liquefaction zones. It may also include some kind of prioritization of development, or direct additional mitigation/adaptation money towards those developments with vulnerabilities to make them more resilient to these hazards. Ashley Nguyen July 19, 2012 Page 2

With regard to land use consistency between proposed PDAs and Bay Plan priority land use designations, several piers on the San Francisco waterfront are designated as part of a PDA, Some of the proposed uses in these PDAs may conflict with Commission land use policies and the Public Trust. Again, adequate information was not available to determine whether there were actual conflicts.

The Commission staff will continue to work closely with MTC and ABAG staff to resolve issues associated with sea level rise and storm events and the designation and development of PDAs and the transportation facilities and services during the formulation of the EIR. If you have any questions regarding the comments in this letter, please contact Lindy Lowe at (415) 352-3642 (lindyl@bcdc.ca.gov).

Sincerely, The for:

JOSEPH LaCLAIR Chief Planner

555 California Street 10<sup>th</sup> Floor San Francisco, CA 94104

July 12, 2012 Via Hand Delivery

Ms. Ashley Nguyen EIR Project Manager MTC Joseph P Bort MetroCenter 101 Eighth Street Oakland, CA 94607-4700

Re: <u>Plan Bay Area EIR Scoping Comments</u>

Dear Ms. Nguyen:

BIA of the Bay Area respectfully submits the following comments and material pursuant to the Notice of Preparation for the Plan Bay Draft EIR.

First, BIA supports studying as one of the alternatives the proposal submitted jointly by the Bay Area Business Coalition and the Non Profit Housing Association (Alternative 4).

Second, BIA believes it is essential for the agencies to complete the PDA Assessment also suggested by the Business Coalition. Although the region has been assigned (at its own request) a 2035 target of 15% per capita GHG reduction, SB 375 clearly provides that a region cannot adopt an SCS development pattern that is infeasible as defined in the statute, even if the consequence is not meeting the target. Indeed, the statute specifically contemplates such a result with its extensive provisions regarding Alternative Planning Strategies. As several of the enclosed documents establish, the feasibility of the Proposed Project's highly aggressive reliance on PDAs has not been established. In fact, they represent substantial evidence that it is not based recent analyses completed by the agencies and the best currently available information, as does the recent quote from the agencies' own consultant Karen Chapple that "it's just basically impossible to implement." For this reason, the only legitimate way that the agencies could provide substantial evidence supporting the specified level of PDA development is through a comprehensive PDA Assessment as the agencies' themselves recognized and committed to undertake in the 2010.

Third, related to the feasibility requirement of SB 375, is the requirement in federal law for regions required to undergo conformity determinations under the federal Clean Air Act, to adopt an RTP land use pattern that is realistic and achievable. Federal guidance on this issue provides that substantial deviations from prior development trends will not meet these requirements unless supported by persuasive evidence, as the attached material makes clear.

Fourth, with respect to the FOCUS PDA program, it is important the DEIR explain specifically what PDAs are and what they are not: To quality as a PDA, it is not necessary that the PDA be consistent with the jurisdiction's general plan, zoning, or other land use policies; PDAs also must comply with the minimum density requirements in the Station Area Planning Manual, and to adequately inform the public and decision makers, the DEIR should thoroughly EIR Scoping Comments July 12, 2012 Page Two

disclose the place types and associated densities provided in the Station Area Planning Manual, and the fact that the PDAs must be developed at least at the minimum density for the relevant place type, as confirmed in the FOCUS PDA application and related guidelines. The specifics of the PDA process, rather than vague generalizations about its purpose and potentially beneficial results it may bring, is essential to comply with CEQA's informational purposes. In addition, PDA resolutions of support from jurisdictions do not undergo any CEQA compliance; to our knowledge over 200 PDA applications have been approved and not one has been formally rejected in a vote by ABAG; also, following the elimination of redevelopment agencies, several local officials were quoted as saying that their own approved PDAs were no longer even potentially feasible. Again, this supports the need for a thorough PDA-by-PDA analysis as proposed by the Business Coalition.

Fifth, CEQA case law provides that only reasonable and potentially feasible policies and mitigation measures may be studied in an EIR. One of the proposed alternatives relies on a regional development fee imposed by BAAQMD (an Indirect Source Fee). Not only would such a fee require 2/3 voter approval by the entire region under recently approved constitutional requirements in Proposition 26, but more importantly it is manifestly not within the authority of either co-lead agency. It is therefore improper to include this "policy lever" (or any similar increased developer fees or regulatory mandate by local jurisdictions), because it is known with certainty that these measures are legally infeasible as defined by CEQA.

Sixth, we strongly support the statement in the NOP that local lead agencies will determine whether individual projects are consistent with the SCS. We also suggest that the agencies acknowledge that for purposes of "traditional" CEQA tiering (as opposed to the SB 375 statutory exemptions), the criteria for consistency may not be the same.

Seventh, we request amplification on the issue of UGBs as they are described in the NOP. It is unclear what is meant by the different levels of "compliance" with UGBs. If the DEIR is going to explore this area, it should identify each local UGB or equivalent that it is purporting to analyze, and describe with particularity the current elements of the UGB (i.e., does it require voter approval to change?; does it require supermajority approval by elected officials to change? What are the details of any recent changes (if any) in the last 10 years?

Eighth, the DEIR should acknowledge the consistent description and presentation of the policy-based *Projections* land use patterns as aggressive and distinctly different than a trends or business-as-usual scenario.

Tbank vou.

Paul Campos // Sr. VP & General Counsel



BUILDING INDUSTRY ASSOCIATION

#### Enclosed Material

- Parts of Final EIR for T2030
- Excerpt of Response to Comments for T2030
- Parts of Final EIR for T2035
- Parts of DEIR for T2035

6.0

- Plan Bay Area Draft TIS (esp. p.5)
- Sept 27, 2010 ABAG Memo on PDA Assessment
- Oct. 2, 2009 FOCUS email on PDA Assessment
- Nov. 23, ABAG memo on PDA Assessment
- San Francisco Bay Area Housing Needs Plan (2007-2014)
- Shaping the Future of the Nine-County Bay Area, Final Report (2002)
- Shaping the Future of the Nine-County Bay Area, Alternatives Report (2002)
- May 1, 2008 ABAG Memo on Projections 2009
- Jan. 29, 2008 ABAG Memo on Performance Targets and Projections 2009
- Building Forward, Record of Proceedings of SB 375 Conference (esp. remarks of federal officials regarding federal planning requirements at pp. 33-35)
- Jan. 4, 2007 ABAG Memo on RHNA
- July 1, 2006 ABAG Memo on Projections 2007
- May 17, 2012 ABAG Memo on RHNA
- FOCUS PDA Application
- FOCUS PDA Application Guidelines
- May 17, 2010 MTC Memo to RTAC re GHG targets
- April 11, 2011 Memo and Letters from San Francisco
- June 13, 2012 article from SF Public Press
- May 12, 2012 article from SF Examiner
- June 26, 2012 article from WSJ
- Downtown Berkeley Development Feasibility Study
- Excerpt from ECHO analysis
- Minutes of MTC Planning/ABAG Administrative Committee dated 9/10/10
- MTC/ABAG response to Business Coalition April 2012 letter
- May 18, 2010 data transmittal memo from 4 MPOs to CARB
- May 25, 2010 MTC Presentation "What Would It Take to Achieve the Best Alternative?"
- EPA Guidance
- Policies for the Bay Area's Implementation of SB 375
- SF Bay Area Transportation Air Quality Conformity Protocol

Note: Enclosed Material can be found at the end of this set of Comments from Agencies

From:	eircomments
To:	s.burley@californiavalleymiwoktribe-nsn.gov
CC:	carrie@nijc.org
Date:	6/22/2012 5:02 PM
Subject:	Re: CVMT Comments Regarding: Draft EIR for the Plan Bay Area in accordance with CEQA

Thank you for your comments; they will be considered carefully during the preparation of the Plan Bay Area Environmental Impact Report (EIR). To stay updated on Plan Bay Area and the environmental process, please visit www.onebayarea.org.

Ashley Nguyen, EIR Project Manager Metropolitan Transportation Commission 101 8th Street Oakland, CA 94607 (510) 817-5809

>>> <<u>s.burley@californiavalleymiwoktribe-nsn.gov</u>> 6/14/2012 6:01 PM >>> June 14, 2012

Ms. Ashly Nguyen EIR Project Manager Metropolitan Transportation Commission Joseph P. Bort MetroCenter 101 Eighth Street Oakland, California 94607-4700 eircomments@mtc.ca.gov

Re: CVMT Comments Regarding: Draft EIR for the Plan Bay Area in accordance with CEQA

Dear Ms. Nguyen;

The California Valley Miwok Tribe is in receipt of an email (dated 06/12/2012, sent by the National Indian Justice Center) in regards to the Metropolitan Transportation Commission (MTC) and the Association of Bay Area Governments (ABAG) co-lead agencies for preparing a program-level Draft Environmental Impact Report (EIR) for the Plan Bay Area in accordance with the California Environmental Quality Act (CEQA). Agencies will use the EIR prepared by MTC and ABAG when considering a permit or other approval of a discrete project from Plan Bay Area. Local jurisdictions and transportation agencies may also elect to use this program-level EIR for tiering in second-tiered EIRs covering land use project or transportation plans, projects, or programs.

#### Comments:

The California Valley Miwok Tribe (CVMT) is a federally recognized 'landless' tribe located in San Joaquin County. CVMT oversees ten (10) counties that are within the aboriginal Miwok territories/boundaries, which are as follows: Alameda, Alpine, Calaveras, Contra Costa; Fresno; Madera; Merced; San Joaquin; Solano; and Stanislaus County.

In regards to the Draft EIR for the Plan Bay Area, CVMT is requesting to be notified of any projects that are proposed within any of the aforementioned (10) counties that may have an effect on sacred Miwok cultural sites. Especially since historically Miwok Indians regularly lived and traveled throughout counties in which some of the counties are located in the Bay Area, in Calif.

Respectfully Submitted,

/s/ Silvia Burley, Chairperson <u>s.burley@californiavalleymiwoktribe-nsn.gov</u>

#### CC: National Indian Justice Center, via email: <u>carrie@nijc.org</u>

Note: Due to the high cost of postage, and being that our Tribe oversees 10 counties, the Tribe will respond to this inquiry and future inquiries via email. If you need or require an originally signed hard copy, please provide a stamped, self-addressed envelope. Thank You!

California Valley Miwok Tribe 10601 N. Escondido Pl. Stockton, CA 95212 Tribal Office: (209) 931-4567 Fax: (209) 931-4333

http://www.californiavalleymiwoktribe-nsn.gov.

STATE OF CALIFORNIA \_\_BUSINESS. TRANSPORTATION AND HOUSING AGENCY

### DEPARTMENT OF TRANSPORTATION

**111 GRAND AVENUE** P. O. BOX 23660 OAKLAND, CA 94623-0660 PHONE (510) 286-5900 FAX (510) 286-5559 **TTY 711** 

July 10, 2012

Ms. Ashley Nguyen

Metropolitan Transportation Commission Joseph P. Bort MetroCenter 101 Eight Street Oakland, CA 94607-4700

Dear Ms. Nguyen:

### Plan Bay Area - Notice of Preparation

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Plan Bay Area. The following comments are based on the Notice of Preparation for the Draft Environmental Impact Report (EIR).

### California Environmental Quality Act (CEQA) Streamlining

Although the Sustainable Communities Strategy (SCS) is a guide for development to reduce its share of greenhouse gas (GHG) emissions, the proposed provisions for CEQA streamlining should address potential transportation impacts to the State Highway System (SHS). Caltrans is particularly concerned with additional vehicular impacts by new development that may exaccrbate already congested local and state roadways. The EIR should identify and discuss proposals to address these impacts in terms of vehicle miles and propose measures to minimize these impacts. These measures can include but not limited to land use and parking management requirements, multi-modal transportation strategies and other transportation demand management (TDM) measures. These TDM measures proposed by projects under the CEQA Streamlining exemptions should also be monitored and evaluated within a specific timeframe after project completion to ensure that these measures have effectively reduced transportation demand.

Currently, under Section 15064.4 of the CEQA Guideline, the methodology used to quantify GHG emissions is determined by the lead agency. The CEQA Streamlining should include a uniform approach on the calculating GHG to provide a consistent comparison of reduction tools and strategies used for these reductions.

#### Maintenance

Caltrans is pleased that the development of the Plan Bay Area has acknowledged the need for rehabilitation of State bridges. However, of the \$277 billion forecasted revenue over the next 28years, Plan Bay Arca expects continued shortfalls in highway maintenance funding. As such, it will be important to prioritize maintenance funding in the Plan Bay Area that will provide the greatest benefit for the traveling public. Some of these prioritizing strategies may include roadways within/near Priority Development Areas (PDA), major goods movement corridors, and

"Caltrans improves mobility across California"



Flex your p Be energy efficient!

EDMUND G. BROWN JR., Governm

**BAG055** SCH#2012062029 Ms. Ashley Nguyen/Metropolitan Transportation Commission July 10, 2012 Page 2

facilities that have planned HOV and HOT lane projects to reduce lane closure duration. In addition, per MTC Resolution 4035, Caltrans would like to maintain the flexibility of swapping State Highway Operation and Protection Program funds for local funds as a credit for PDA investments.

#### Freight Movement

Responsible for a significant share of GHG emissions, freight movement should be fully integrated and adequately addressed in this update of the Regional Transportation Plan. The EIR should include a discussion on the growth and investments of freight movement within the region.

Further, planning and project funding will need to build upon the importance given to freight movement needs through the State's Trade Corridor Improvement Fund (TCIF) resulting from the passage of Proposition 1B and federal TIGER grants the Bay Area has benefited from recently. Freight movement investment should be coordinated with expansion plans at the various ports and airports within the region.

#### Native American Coordination

As stated in the Public Involvement and Outreach requirements of the previous and current RTP, Caltrans recommends including a discussion of the Plan Bay Area impacts on Native American communities.

#### **Climate Policy Initiatives**

Clean vehicles may require increased investment in specialized infrastructure (ex - EV charging stations) specifically needed to support this alternative mode of vehicular transport. Both private and public investment in this infrastructure may be needed in support of this emerging sub-mode type.

Further, Climate Policy Initiatives should also include funding for infrastructure that improves access and safety for bicycle and pedestrian travel in order to support this upward trending growth in these two mode shares categories.

#### **Regional Transportation Impact Fee**

With a forecasted growth of over a million new people by 2040, the number of vehicular trips will continue to grow. The SHS will require significant improvements to accommodate this growth. Caltrans recommends developing and implementing a regional transportation impact fee program to fund, support and maintain the quality of the SHS for the traveling public. Caltrans suggests prioritizing Regional Impact Fees to fund project in corridors with adopted Corridor System Management Plans.

Ms. Ashley Nguyen/Metropolitan Transportation Commission July 10, 2012 Page 3

Should you have any questions regarding this letter, please call Lee Taubeneck, Deputy District Director, Transportation Planning and Local Assistance, at (510) 286-5908.

Sincerely,

BUAN SARTIPI District Director

c: State Clearinghouse

"Caltrans improves mobility across California"

From:	Thomas Galletti <jmesg128@pacbell.net></jmesg128@pacbell.net>
To:	<info@mtc.ca.gov></info@mtc.ca.gov>
Date:	7/18/2012 3:00 PM
Subject:	Three Letter to Supervisors

So sorry,

I'm so sorry that they were not included....I'm sure they didn't attach correctly. Thank you for the heads up!! Here they are, with my own comments included. Blessings!! Judy

Letter 1:

July 6, 2012

District 1 Supervisor Scott Haggerty District 2 Supervisor Richard Valle District 3 Supervisor Wilma Chan District 4 Supervisor Nate Miley District 5 Supervisor Keith Carson

#### Dear Supervisors,

My name is Judy Galletti and I am writing because I see inconsistencies in the OneBayArea Plan. Questions remain about the accuracies of assessments done by the group. I notice that many important evaluations were not even considered. I am uniting with many citizens who want you to know that we are uncomfortable with a program that is inaccurate and incomplete in it's review of important data concerning this plan. My first meeting with OBA was a public opinion survey. Unfortunately, at my table, were three MTC employees, one OBA presenter from Missouri and a Housing Official from Sacrament. All of these women voted.....AND for the first time in my 63 years of life, I witnessed blatant fraud, perpetrated by government employees. Based on this fraudulent survey, you were given information that, you thought, came from your citizens. I hope you will conduct a complete investigation of the antics perpetrated by this Canadian Organization. I, also, hope you will keep the money in the United States next time you have a company.

Section 15151 of the CEQA Guidelines governs the Standards for Adequacy of an EIR states:

An EIR should be prepared with a sufficient degree of analysis to provide decisionmakers with information which enables them to make a decision which intelligently takes account of environmental consequences. An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts. The courts have looked not for perfection but for adequacy, completeness, and a good faith effort at full disclosure.

Plan Bay Area's forecasts for population, job, and household growth are fatally inadequate and incomplete and fail in every respect to meet the standards required by § 15151. These deficiencies have a substantive and material impact on the scope and content of the environmental and economic information that will be evaluated in the Plan Bay Area's environmental and economic impact reviews, and must be remedied before those reviews proceed further.

Specifically, (1) Plan Bay Area's forecasts are too high and lack analytical and empirical support, (2) Plan Bay Area's forecasting methodology must be open, transparent, and accessible to third parties in order to evaluate the underlying assumptions and resulting forecasts, and for the forecasts to be modified as empirical data and analysis are gathered during the forecast period, (3) Plan Bay Area's forecast must have a range of outcomes rather than a single point estimate to account for different underlying assumptions and to perform the sensitivity analysis necessary to adequate and complete policy decisions, (4) there must be an objective, unaligned forecasting agency to perform an independent forecasting analysis either to replace the current Plan Bay Area forecasts or for comparison purposes, and (5) Plan Bay Area forecasts must be compared with and evaluated in the light of independent bottoms-up forecasts made by the Bay Area counties, cities and towns themselves.

Without remedying these inadequacies, Plan Bay Area's environmental and economic impact reports will be invalid and will not be certifiable.

1) Plan Bay Area's forecasts are too high and lack analytical and empirical support

The Bay Area had population growth rates between the 1960s and the 1990s

dramatically higher than the overall US growth rates (see attached), yet the Bay Area's population growth plummeted to far below the US growth rate in the decade of the 2000s. The Bay Area's average population growth per decade for the four decades from 1960 to 2000 was 17.00%–142.46% of the average national population growth rate of 11.94% over those four decades—but in the 2000's, the Bay Area's population growth rate dropped to 5.4%, only 55.72% of the national growth rate for that decade (9.71%).

This cannot be explained by the two recessions in the past decade, as there were recessions in each of the four decades prior to the decade of the 2000s, when the Bay Area's population growth rate remained far above the national growth rate. Also, the national population growth rate in the decade of the 2000s was roughly the same as it had been in the prior four decades despite the two recessions, yet the Bay Area's population growth dropped dramatically in the decade of the 2000's. Yet, the Plan Bay Area forecasts impute a population growth rate of 8.87% per decade for the next three decades—much higher than the 5.41% growth rate of the decade of the 2000s.

The Plan Bay Area forecast for job growth is even more untethered to and unsupported by empirical data or sound analysis. The City of Palo Alto has repeatedly questioned ABAG's forecasting methodology, pointing out in a staff memorandum dated January 25, 2012 (attached) its continued bafflement that "ABAG has estimated that the region will accommodate approximately 33,000 new jobs per year through 2040, as compared to only 10,000 jobs per year over the past 20 years." There is no plausible explanation or theory by which ABAG can project job growth in the Bay Area of any higher than the 10,000 per year seen over the past 20 years, let alone a job growth per year 330% of that experienced over the past 20 years.

In order to remedy the inadequacy and incompleteness of the forecasts underlying the Plan Bay Area project wide EIR, and to have the basis for valid economic and environmental impact reports:

(2) Plan Bay Area's forecasting methodology must be open, transparent, and accessible to third parties in order to evaluate the underlying assumptions and resulting forecasts, and for the forecasts to be modified as empirical data and analysis are gathered during the forecast period,

3) Plan Bay Area's forecasts must have a range of outcomes rather than a single point estimate to account for different underlying assumptions and to perform the sensitivity analysis necessary to adequate and complete policy decisions, The forecasts underlying Plan Bay Area's environmental and economic impact reports must provide a range of growth estimates (low, mid-range, and high) in order for its economic and environmental analysis to be adequate and complete, and for the EIR to be valid and certifiable.[1] The type of planning that ABAG and MTC are proposing will lead to substantial and irreversible changes in the way of life of every Bay Area resident, both current and future. A single point estimate for population, jobs and households is inadequate and incomplete as a matter of simple methodology. In addition, the mid-range forecast, presumably most probable, must be no higher than the growth rates for jobs, population and household formation in the 2000s to be even remotely credible. The assumption that Bay Area growth rates plummeted in the 2000s with respect to national growth rates due to the economy has no empirical or analytical foundation. (4) there must be an objective, unaligned forecasting agency to perform an independent forecasting analysis either to replace the current Plan Bay Area forecasts or for comparison purposes. This must be done before environmental and economic impact reports can be formulated, let alone certified. ABAG and MTC have received repeated, strong objections to the forecasts underlying its planning process from various stakeholders over the past several years. In just one of many, many examples on ABAG's own website, the City of Berkeley notified ABAG on September 14, 2007 that ABAG's "unrealistic goals . . . may have unintended consequences in regard to meeting overall regional housing needs.'

In fact, the City of Palo Alto is calling for "independent analysis of the demographic and employment projections by ABAG." [staff memorandum dated January 25, 2012] The fact that ABAG and MTC have not provided this independent analysis is a severe inadequacy in its forecasts, plan, and methodologies that alone will invalidate its EIR and economic impact analysis, let alone any decisions made upon Plan Bay Area until this is remedied. However, this inadequacy is particularly glaring and severe given the facial implausibility of its projections with respect to empirical data over the past decade or two. ABAG and MTC simply must engage a neutral, objective organization to perform an independent forecast before its EIR and economic impact analysis continues any further, as everything it does from here is subject to being completely invalidated and voided due to the flawed forecasts and methodology. (5) Plan Bay Area's forecasts must be compared with and evaluated in the light of independent bottoms-up forecasts made by the Bay Area counties, cities and

#### towns themselves.

For the forecasts underlying the EIR and the economic impact review to enable those exercises to be remotely adequate and complete, and for the EIR to comply with CEQA, there also must be a bottoms-up assessment by county and city by the counties and cities themselves, of their, informed expectations of job, population, and household growth over the next three decades. This must be done completely independent of the Plan Bay Area top-down forecasts as those have been allocated to individual jurisdictions, to avoid contamination and undue influence. This will provide an essential double check on the validity of ABAG's top-down estimates (even once those are prepared through a valid methodology), both in aggregate, and also by town and county. Even if the aggregate estimates are consistent with one another, if there are significant variances between ABAG's allocated numbers and a town or city's own, informed estimates, those variances will likely indicate flaws in ABAG's estimates, problems in securing public and stakeholder support for the eventual adopted plan, and difficulties in achieving the goals of that plan. The fact that many towns and cities have objected to the Regional Housing Needs

Assessment as unrealistic and inconsistent with their own informed estimates proves that this is a vitally important exercise for the EIR to comply with CEQA and for the EIR and economic impact analysis to be even remotely adequate and complete.

Sincerely, Judy Galletti

CAPR/Alameda County/Livermore

Letter 2: July 6, 2012

Dear Supervisors

My name is Judy Galletti. I join many others in opposing the OneBayArea Plan. The flaws and incorrect information, stated by this group, need to be corrected before you can have a, truly, informed vote. The plan, as it stands, is disruptive and problematic for communities all over the Bay Area. I thank you for considering our concerns.

According to Section 15021(d) of the CEQA Guidelines, "CEQA recognizes that in determining whether and how a project should be approved, a public agency has an obligation to balance a variety of public objectives, including economic, environmental, and social factors" (emphasis added). California's CEQA Guidelines themselves are read together with the U.S. government's NEPA regulations which state in Section 1508.14 that "[w]hen an environmental impact statement is prepared and economic or social and natural or physical environmental effects are interrelated, then the environmental impact statement will discuss all of these effects on the human environment."

California courts have interpreted the CEQA Guidelines to require a lead agency to consider secondary or indirect consequences in its environmental impact report (EIR). Citizens Association For Sensible Development of Bishop Area v. County of Inyo 172 Cal. App. 3d 151, 169 (1985) ("[T]he lead agency shall consider the secondary or indirect environmental consequences of economic and social changes . . . Such an interpretation is unequivocally consistent with the mandate that secondary consequences of projects be considered") (emphasis added)

Thus, the scope of Plan Bay Area's EIR must include an assessment and analysis of "the secondary or indirect environmental consequences of economic and social changes" that will result from the Plan itself. Id. In order to adequately and completely analyze those secondary consequences, any potentially significant economic and social changes due to the contemplated program or project must themselves be adequately and completely analyzed.

Furthermore, the lead agency may not perform this analysis in a conclusory or biased fashion. According to CEQA Guidelines §15003(j), "CEQA requires that decisions be informed and balanced." Additionally,

"CEQA requires that decisions be informed and balanced." Additionally, §15090(a)(1) states that "[p]rior to approving a project the lead agency shall certify that the final EIR has been completed in compliance with CEQA," and §15020 states that "[t]he Lead Agency shall not knowingly release a deficient document." Therefore, if the Plan Bay Area EIR does not include such an informed and balanced analysis, the EIR cannot be certified.

Plan Bay Area's number one goal, as stated by MTC Executive Director Steve Heminger and ABAG Assistant Executive Director Patricia Jones in a May 4, 2012 memorandum entitled "Bay Area Preferred Land Use Scenario/Transportation Investment Strategy," is to "create jobs to maintain and sustain a prosperous and equitable economy."

Plan Bay Area's "preferred alternative" will divert the majority of gasoline tax revenues away from maintenance and expansion of existing roads and bridges and into additional mass transit subsidies. In addition, its coercive and

restrictive zoning standards propagated throughout the Bay Area will force virtually all new development and redevelopment into "stack and pack" housing and mixed-use structures in so-called "transit villages" which comprise no more than 4% of the land area in the nine county Bay Area. Virtually all development and redevelopment in the remaining 96% of the Bay Area will cease because of these coercive and restrictive zoning standards.

The proponents of Plan Bay Area's "preferred alternative" suggest that diverting gas tax revenues from existing roads and bridges into further subsidies directed towards already under-utilized mass transit, together with coercive zoning, loss of property rights, and restrictions on Bay Area residents' liberties and freedoms, will lead to increases in population and jobs, and improved solvency of local cities, towns, and counties, over not adopting its "preferred alternative." However, these expected outcomes are based on magical thinking wholly bereft of empirical support or sound analysis—and rather reflect the ideological and philosophical goals of the planners rather than the sober, cogent, and objective analysis required by CEQA.

For Plan Bay Area's EIR and economic impact reports to be adequate and complete under CEQA, let alone even remotely plausible and credible, ABAG and MTC must engage an independent, neutral forecasting firm that will, at minimum, provide the following analysis to the EIR Project Team for incorporation and evaluation in the EIR:

(1) Plan Bay Area's EIR must address the theories, data, and analysis of planning experts like Michael Tanner of Cato Institute who have found that the sorts of restrictive and coercive land use and zoning policies contemplated by Plan Bay Area tend to decrease, rather than increase, population and job growth rates. [1] Careful and thorough consideration of this hypothesis regarding the impact of the "preferred alternative" is necessary for the analysis in the EIR to be informed and balanced. CEQA Guidelines §15003(i).

(2) The EIR must quantitatively and explicitly identify the subsidies required to develop the "stack and pack" mixed-use properties needed to meet empirically valid forecasts for growth in population, job, and household formation. If it was profitable to develop or redevelop such units without coercive and restrictive zoning and accompanying subsidies, developers would have already done so. Therefore, it is fair and reasonable to assume that every new development or redevelopment under the "preferred alternative" zoning will require subsidies—subsidies that may be massive especially given that the market will be flooded with this sort of property, far beyond any analytically-sound projections of demand for these sorts of facilities on the part of households and businesses.

(3) There are already a number of "stack and pack" developments throughout the Bay Area. Some of these may have been built by developers to satisfy the arguably small niche in the marketplace of households and businesses desiring these types of properties. Most developments of this type, however, have been built in recent years due to the implementation of "preferred alternative-lite" restrictive zoning standards in individual jurisdictions mandating "stack and pack" development, enabled only by the availability of massive subsidies to develop these properties. There must be an assessment of the performance of these "stack and pack" developments across the entire Bay Area that will examine both the subsidies required to build and operate each such development, and the performance of each development with respect to projected profit/loss margins and occupancy rates.[2] Then, this data must be considered and inform the analysis in both the EIR and environmental impact reviews for either to be adequate and complete, let alone certifiable. The tax revenues of all sorts from these properties both against projections and versus alternative uses must also be identified and analyzed.

(4) There must be an assessment and analysis of the impact on jobs, population, household formation, and greenhouse gas (GHG) emissions due to the diversion of most gasoline tax revenues over the next three decades away from the maintenance of existing roads and bridges and into additional mass transit subsidies. Such a dramatic decline in road and bridge maintenance will lead to lower average speeds, longer commute times, more accidents, and increased automobile repair costs, all of which may result in dramatically increased GHG emissions over what would be the case if the current portion of gas tax revenues remained dedicated to maintaining roads and bridges. Second, any rationale for diverting additional monies to mass transit must provide empirical cost and utilization data for the existing mass transit infrastructure to identify how much it costs to subsidize the system and how many people actually use it. If a significant number of bus routes in the Bay Area are currently under-utilized—an observation that is anecdotally obvious—the notion that increasing mass transit

capacity will lead to increased ridership is empirically unsubstantiated and analytically unsound.[3]

(5) The proposed Plan Bay Area will result in virtually all new development and redevelopment over the next three decades taking place in "transit villages" which comprise only 4% of the actual Bay Area land area. Landowners in the 96% of the Bay Area that lies outside of the "transit villages" will inevitably experience declining property values due to the coercive and restrictive zoning in these areas, and many will request and receive reassessments for property tax purposes. It is therefore essential to assess and analyze the impact of declining property tax revenues on city, town, and county budgets resulting from Plan Bay Area.

The Plan Bay Area EIR Project Team must undertake the analysis outlined above and must do so in an informed and balanced manner in order for the scope of the EIR to be deemed adequate and complete. It is virtually certain that the "preferred alternative" will lead to significant, adverse, and as-of-yet undisclosed impacts on family, city, town, and county budgets. These must be analyzed and understood in order for the EIR to be adequate and complete. Budgetary funds are often fungible, and the substantial cost increases and revenue losses that will result from the Plan will mean fewer funds available for all other purposes, including monies that would otherwise be directed to environmental causes and purposes.

Sincerely, Judy Galletti CAPR/Alameda County/Livermore

Letter 3: July 6, 2012

#### Dear Supervisors,

As you can see by these letters, our people have done some very valuable assessments and critiques. I'm sure you appreciate the help in regards to areas you might have missed. Considering the knowledgeable experts that work with us, we are blessed to have their information and results of their studies. Please take these letters into consideration as you plan your next step. According to Section 15021(d) of the CEQA Guidelines, "CEQA recognizes that in determining whether and how a project should be approved, a public agency has an obligation to balance a variety of public objectives, including economic, environmental, and social factors" (emphasis added). California's CEQA Guidelines themselves are read together with the U.S. government's NEPA regulations which state in Section 1508.14 that "[w]hen an environmental impact statement is prepared and economic or social and natural or physical environmental effects are interrelated, then the environmental impact statement will discuss all of these effects on the human environment." California courts have interpreted the CEQA Guidelines to require a lead agency to consider secondary or indirect consequences in its environmental impact report (EIR). Citizens Association For Sensible Development of Bishop Area v.

County of Inyo 172 Cal. App. 3d 151, 169 (1985) ("[T]he lead agency shall consider the secondary or indirect environmental consequences of economic and social changes . . . Such an interpretation is unequivocally consistent with the mandate that secondary consequences of projects be considered") (emphasis added).

Thus, the scope of Plan Bay Area's EIR must include an assessment and analysis of "the secondary or indirect environmental consequences of economic and social changes" that will result from the Plan itself. Id. In order to adequately and completely analyze those secondary consequences, any potentially significant economic and social changes due to the contemplated program or project must themselves be adequately and completely analyzed.

Furthermore, the lead agency may not perform this analysis in a conclusory or biased fashion. According to CEQA Guidelines §15003(j), "CEQA requires that decisions be informed and balanced." Additionally,

"CEQA requires that decisions be informed and balanced." Additionally, §15090(a)(1) states that "[p]rior to approving a project the lead agency shall certify that the final EIR has been completed in compliance with CEQA," and §15020 states that "The Lead Agency shall not knowingly release a deficient document." Therefore, if the Plan Bay Area EIR does not include such an informed and balanced analysis, the EIR cannot be certified.

Plan Bay Area's number one goal, as stated by MTC Executive Director Steve Heminger and ABAG Assistant Executive Director Patricia Jones in a May 4, 2012 memorandum entitled "Bay Area Preferred Land Use Scenario/Transportation Investment Strategy," is to "create jobs to maintain and sustain a prosperous and equitable economy."

Plan Bay Area's coercive zoning standards which will be propagated throughout the Bay Area will force virtually all new development and redevelopment into "stack and pack" housing and mixed-use structures in so-called "transit villages" which comprise no more than 4% of the land area in the nine county Bay Area. Virtually all development and redevelopment in the remaining 96% of the Bay Area will cease because of these coercive and restrictive zoning standards—much of that land owned by tens if not hundreds of thousands of individual landowners, each of whom may wish to use their land over the next thirty years in ways which will be prohibited or made virtually impossible by the "preferred alternative" contemplated by Plan Bay Area.

The "preferred alternative" will have such drastic effects on the private property rights of Bay Area landowners that the environmental and economic impact assessments must consider the potential liability for litigation before the EIR and economic impact analysis can be considered adequate or complete. Further, without performing then considering this sort of analysis, the EIR cannot be certified.

The Fifth Amendment to the United States Constitution prohibits the government from taking property from landowners unless it is for a public purpose and the government pays just compensation. Under the United States Supreme Court's regulatory takings doctrines formulated in Nollan v. California Coastal Commission, 483 U.S. 825 (1987), Lucas v. South Carolina Coastal Council, 505 U.S. 1003 (1992), and other cases, even if the land owner continues to nominally hold title to property, the government's regulations can be so onerous as to constitute a taking requiring compensation to the landowner.

The Court's opinion in Lucas is particularly apposite here. In Lucas, the Court cited longstanding precedent in stating that "the Fifth Amendment is violated when land-use regulation "denies an owner economically viable use of his land." 505 U.S. at 1016 (citation omitted). The Court pointed out that under established principles of law,

If . . . the uses of private property were subject to unbridled, uncompensated qualification under the police power, "the natural tendency of human nature [would be] to extend the qualification more and more until at last private property disappear[ed]." Pennsylvania Coal Co. v. Mahon, 260 U. S. 393, 415 (1922). These considerations gave birth in that case to the oft-cited maxim that, "while property may be regulated to a certain extent, if regulation goes too far it will be recognized as a taking." Ibid.

Id. at 1014.

Plan Bay Area contemplates two unelected regional government bodies with tenuous constitutional authority directing the expenditure of \$277B in gas tax revenues while sharply restricting or disallowing new development or redevelopment outright in 96% of the land area in the Bay Area. This is the essence of "unbridled, uncompensated qualification under the police power." Id. at 1016. The potential liability for takings-related judgments or settlements could be in the tens of billions of dollars in thousands or tens of thousands of lawsuits, even before considering the cost of litigating the number of cases that may be brought. The environmental and economic impact reports must consider the potential liability for takings litigation exposure and its impact on county and city budgets, and on the timeframe and likelihood of implementation of the plan if it is passed.

For such an assessment of litigation exposure to be adequate and complete in the environmental and economic impact assessments, it must be conducted by an independent entity that is not an existing proponent of comprehensive regional plans expressing the goals of United Nations Agenda 21 at the local and regional level, as such an entity will not provide the public and the MTC and ABAG boards with an informed and balanced analysis. The assessment must also be transparent, and made available to the public at the same time it is made available to the EIR and economic impact analysis staffs and to the ABAG and MTC boards.

It is virtually certain that the "preferred alternative" will lead to significant, adverse, and as-of-yet undisclosed impacts on family, city, town, and county budgets. The Plan Bay Area EIR Project Team must undertake the analysis outlined above and must do so in an informed and balanced manner in order for the scope of the EIR to be adequate and complete. Budgetary funds are often fungible, and the substantial cost increases and revenue losses resulting from the Plan will mean fewer funds available for all other purposes, including monies which would otherwise be directed to environmental causes and purposes. The American Planning Association, in its Policy Guide on Takings ratified April 11, 1995, offered several admonitions which ABAG and MTC would do well to adhere to here, as each one of these admonitions is violated egregiously in both the Plan Bay Area process and in the substance of the contemplated "preferred alternative":

3. The American Planning Association and its chapters recognize the need for fairness to all persons and entities of government under laws and regulations imposed by all levels of government.

At a minimum: . . C. Regulations affecting the use and development of land should be limited in scope to avoid unintended effects on land values except as necessary to carry out the public purpose of the regulations under the police. D. Regulations affecting the use and development of land should permit

D. Regulations affecting the use and development of rand should permit reasonable flexibility to minimize hardship. In particular, regulations should permit alternative methods of compliance that may reduce or eliminate the economic costs of compliance while preserving the intent of the regulations. E. Regulations affecting the use and development of land should be adopted only after a review process offering the opportunity for significant permiting her difference of the adopted on the regulation of the reg participation by affected governmental entities and persons, including property owners.

Sincerely,

Judy Galletti CAPR/Alameda County/Livermore From:Ashley NguyenTo:Stefanie HomDate:7/12/2012 5:10 PMSubject:Fwd: Attn. Supervisors

Ashley Nguyen Senior Transportation Planner/Analyst Metropolitan Transportation Commission 101 Eighth Street | Oakland, CA 94607 Tel. 510.817.5809 | Fax 510.817.5848

>>> Thomas Galletti <jmesg128@pacbell.net> 7/11/2012 1:32 PM >>>

July 9, 2012

District 1 Supervisor Scott Haggerty District 2 Supervisor Richard Valle District 3 Supervisor Wilma Chan District 4 Supervisor Nate Miley District 5 Supervisor Keith Carson

Alameda County Suite 536, 1221 Oak Street Oakland, CA 94612

Dear Alameda County Supervisors,

The One Bay Area Plan is 25 year plan that combines housing, transportation, and land use that is being developed by MTC/ABAG. The Plan is now in the stage of scoping the Environmental Impact Report (EIR). Public comments are due by July 11. I am forwarding three letters that deal with the inadequacies and incompleteness of the scoping process.

Letter 1: Inaccurate Forecasting

Letter 2: Inaccurate and Incomplete Social and Economic Analysis

Letter 3: Legal Liability Caused by Takings of Property

By copying you on these letters, my intention is to make you aware of the Plan and the fact that most taxpaying citizens who really understand what this Plan is about are against it. I want to encourage you to support our efforts to persuade MTC/ABAG to extend the deadline for scoping the EIR for at least 6 months in order to allow enough time to adequately assess the environmental impact of such a massive and far reaching plan.

Sincerely,

Judy Galletti Citizens Alliance for Property Rights (CAPR) Alameda County/Livermore

<!--[if !vml]--><!--[endif]-->

July 10, 2012

Ashley Nguyen, EIR Project Manager **Metropolitan Transportation Commission** 101 Eighth Street, Oakland, CA 94607

Dear Ms Nguyen,

JUL 1 1 2012 I am writing to forward the petition that is calling on MTC-ABAG to extend public comments on the One Bay Area

RECEIVED

Plan Scoping EIR for a minimum of 6 months to allow the proper amount of time for public input. The entire process that the general public was aware of took place in a 2 week period. The time from the closing of the public comment period to the presentation to the board for preliminary approval is 2 days, the time for final approval, July 19 adds another week to the process. That is hardly enough time to fairly assess the input unless you are doing this to merely maintain the fiction of public input while ignoring true public input.

Under separate cover I have submitted an email providing an overview of my objections to the plan. Your response to that was to send me a form email saying that you received my email and sending my email back to me. Quite an insult. I have also sent three letters on the following topics:

Letter 1: Inaccurate Forecasting Letter 2: Inaccurate and Incomplete Social and Economic Analysis Letter 3: Legal Liability Caused by Takings of Property

There are over 875\*\* people in the Bay Area who are aware of what this plan truly is and have taken to time to sign their name to the petition, many have taken the time to write comments, requesting the extension for further study and debate. I want to encourage you to comply with the legal mandate dictated by SB375 that requires you to get public input and extend the deadline for scoping the EIR for at least 6 months in order to allow enough time to adequately determine the scoping effort of the environmental impact of such a massive, expensive and far reaching plan that will drastically alter life in the Bay Area as we know it.

Sincerely, Mimi Ste<del>o</del>ł

Citizens Alliance for Property Rights (CAPR) President, SFBay CAPR



\*\*I printed this out with 876 signatures at 2:30 pm 7-10-2012 in order to get it in the mail by you by the deadline. will keep the petition open until the close of the day on July 11 and forward the complete set of signatures at that time



Printed on 07-10-2012

# Extend Deadline on One Bay Area EIR

Sponsored by: SFBay CAPR

## About the petition

Plan Bay Area is a proposed comprehensive plan to control land use, housing, and transportation policies throughout the nine-county San Francisco Bay Area. It is a joint product of the Association of Regional Governments (ABAG) and the Metropolitan Transportation Commission (MTC) with input from other regional agencies, Plan Bay Area will dramatically affect every resident of the San Francisco Bay Area. If adopted, the Plan will significantly restrict personal lifestyle choices, including where you live, how you travel, and your cost of living. The Plan transfers authority for the most critical public policy issues - land use, transportation, and housing - from elected local officials to unelected bureaucrats. It will also impose billions of dollars of unfunded expenses on local communities that are already facing huge budget deficits. MTC and ABAG have put in place a "fast track" process for adoption of a Plan that will affect virtually every aspect of your life. It is unlikely that even ten in 1,000 residents of the Bay Area have even heard of Plan Bay Area, much less understand how dramatically it will change their lives and limit the lifestyle choices of their children and grandchildren. ABAG and MTC have commissioned an environmental impact report (EIR) on Plan Bay Area that is seriously incomplete and inadequate. The scoping EIR process fails to address many critical issues, including highly questionable assumptions about population and economic growth, where the hundreds of billions of dollars needed to implement the plan will come from, and how the highly restrictive policies on land use, housing, and transportation will affect the environment and the quality of life in the region. ABAG and MTC have adopted a very aggressive schedule for adoption of the EIR - an essential next step toward adoption of the extremely controversial Plan Bay Area. The time for public comment has been severely limited - ABAG and MTC will cut off public comment on July 11, present final alternatives to MTC-ABAG on July 13 and to approve final alternatives on the EIR scoping on July19. Even worse, the process for public comment has been seriously deficient. Citizens have been instructed that "negative comments" on the Plan are not permitted and that the unelected consultants alone will decide which public comments on the EIR will be submitted to ABAG and MTC. We therefore call upon ABAG and MTC to reject the EIR scoping process as incomplete and inadequate and to extend the time for public comment on the next draft. The issues involved are critically important and decisions must not be made in haste without adequate time for review. The review process must allow maximum latitude for citizens to voice their views on the Plan and to demand complete examination of the most likely outcomes from its adoption. Because the plan amounts to a massive transfer of power from elected local officials to unelected regional bodies, the current review process may be the last opportunity for citizens to make their voices heard. This petition will be mailed (in mail and email format) to ABAG and MTC by July 10. If you support our efforts to ensure full and complete review and comment by citizens of the Bay Area, please add your signature below.

# Signatures

1. Name: Mimi Steel on Jul 02, 2012 Comments: MTC and ABAG would drastically affect life in the SFBay Area. We need to stop this top down, soviet style planning

2.	Name: Paul & Lois Brownlee on Jul 02, 2012 Comments: Stop the HSR LOW SPEED TRAIN TO NO WHERE! End the MTC and unelected representatives in ABAG. NOW!
3.	Name: Denis F. Quinn on Jul 02, 2012 Comments:
4.	Name: Janice Salvato on Jul 02, 2012 Comments:
5.	Name: Anne Krysiak on Jul 02, 2012 Comments:
6.	Name: James Brookhouser on Jul 02, 2012 Comments:
7.	Name: James W. Ricketts on Jul 02, 2012 Comments:
8.	Name: Barbara Schell on Jul 02, 2012 Comments: Stop this madness!!
9.	Name: Margarita Colin on Jul 02, 2012 Comments:
10.	Name: Frank Maffei on Jul 02, 2012 Comments:
11.	Name: Anonymous on Jul 02, 2012 Comments: One Bay Area is another plan by non elected officials to control us - usurping local governments say.
12.	Name: Gary Springer on Jul 02, 2012 Comments: Why are you stealing our rights to vote?
13.	Name: Patrick T. Peterson on Jul 02, 2012 Comments:
14.	Name: G. Charles Steiner on Jul 02, 2012 Comments: The draft EIR is incomplete and inadequate, I feel, and more time is necessary for public comment on the next draft. Not enough people know about the One Bay Area Plan yet, and the issues are too important to let it be rushed.
15.	Name: A. Hipona on Jul 02, 2012 Comments:
16.	Name: Howard Myers on Jul 02, 2012 Comments:
17.	Name: Ame Simonsen on Jul 02, 2012 Comments:

18.	Name: Elizabeth J Hendricks on Jul 02, 2012 Comments: Have attended meetings and found those in attendance are for the most part staff and special interest groups, not so much the general community, so there is really NO input from the community at large. The Bay Area Community needs to know and be informed regarding the plans that are being implemented in their name.
19.	Name: Tim Hensley on Jul 02, 2012 Comments: I am totally against this project. The outcome was planned from the start! Citizens will not tolerate this!
20.	Name: Connie Lathrop on Jul 02, 2012 Comments:
21.	Name: Tina Selene on Jul 02, 2012 Comments: I am against this Soviet type of living environment.
22.	Name: Judy Galletti on Jul 02, 2012 Comments: It is very important that ABAG, MTC and OneBayArea allow the citizens to participate in this process. At this point citizens have been ignored, disrespected, lied to, yelled at, interrupted, and locked out. Agendas have been changed at the last minute, meetings have been changed at the last minute, meetings have been held at inadequate times, meetings have been held in inadequate rooms. ABAG/MTC members have not been present as OneBayArea conducted their fraudulent survey meetings, I sign this petition with thanks and gratitude to the wonderful people in the Bay Area who are brave enough to lead us as we stand up against this tyranny.
23.	Name: Deborah Kerwin-Peck on Jul 02, 2012 Comments:
24.	Name: Carol Pascoe on Jul 02, 2012 Comments: You are acting like our domestic enemies. We have sworn to uphold the Constitution against you!
25.	Name: Pamela George on Jul 02, 2012 Comments: I call upon ABAG and MTC to reject the draft EIR as incomplete and inadequate and to extend the time for public comment on the next draft. These decisions MUST NOT BE MADE IN HASTE without adequate time for review!!!
26.	Name: Janet Songey on Jul 02, 2012 Comments:
27.	Name: Anonymous on Jul 02, 2012 Comments:
28.	Name: Suzanne Valente on Jul 02, 2012 Comments: This Draft EIR is seriously deficient in its objectives and content, and additionally the public has not been provided adequate time to comment. Further, officials attending public events have been unwilling or unable to answewr public questions which have a direct bearing upon the public's approval or disapproval of this project. Take the time and make the effort to do this lawfully.
29.	Name: Deborah Wyllie on Jul 02, 2012 Comments: ,
30.	Name: Marcia Wolfe on Jul 02, 2012 Comments:
31.	Name: Kevin Daniel on Jul 02, 2012 Comments:
32.	Name: Pamela Daniel on Jul 02, 2012 Comments:

33.	Name: Thomas Weissmiller on Jul 02, 2012 Comments:
34.	Name: Art Songey on Jul 02, 2012 Comments:
35.	Name: Anonymous on Jul 02, 2012 Comments:
36.	Name: Patrick Dullea on Jul 02, 2012 Comments: Unelected bureaucrats must be removed from the decision making / enforcement process of bay area planning. I stand in opposition to "Plan Bay Area". pd.
37.	Name: Anonymous on Jul 02, 2012 Comments:
38.	Name: John Hertzer on Jul 02, 2012 Comments: need COMPLETE review and comment by citizens
39.	Name: Anonymous on Jul 02, 2012 Comments:
40.	Name: Anonymous on Jul 02, 2012 Comments:
41.	Name: Howard Jack Smith on Jul 02, 2012 Comments: insane!
42.	Name: Joyce Adriance on Jul 02, 2012 Comments: The full impact of this plan must be made known to the citizens, who in financing it, are entitled to full disclosure.
43.	Name: Anonymous on Jul 02, 2012 Comments: Where is the public input and representation?We are not kept in the loop.Why are unelected bureaucrats making decisions that should be voted on?
44.	Name: Paul Dickey on Jul 02, 2012 Comments: This review process has been a farce.
45.	Name: Linda Withrow on Jul 02, 2012 Comments: I object to the Bay Area Plan having unelected officials make rulings on how my family & amp; I live, and travel within the 9 counties is wrongThere is so much big money already making important decisions "on my behalf" without any checks or balances, & amp; limited recourse I say NO to the Bay Area Plan!!!!
46.	Name: Patrick Cabral on Jul 02, 2012 Comments: the greed og ABAG needs to be halted!
47.	Name: Judith E Fletcher on Jul 02, 2012 Comments: Let's hope that this isn't the last chance to rebuke this outrageous plan. Anything worth doing, will withstand the LIGHT OF DAY and public input. We're not all sheep and many of us even think for ourselves.
48.	Name: Al Pori on Jul 02, 2012 Comments:
49.	Name: Joel Fine on Jul 02, 2012 Comments:

51. Name: Judy Grote on Jul 02, 2012 Comments: This should not be rushed through. More Bay Area residents need to be educated on the plan so that they can provide input. The data upon which the plan is based is questionable. Elected officials need to be held responsible, nor more unelected 'consultants; and bureaucrats that are responsive to no one but themselves. The constituents which pay the taxes need to be given adequate time to inform themselves. Private property needs to be respected. 52. Name: Tom Harpham on Jul 02, 2012 Comments: 53. Name: Susan Kirsch on Jul 02, 2012 Comments: Name: Scott A. Jones on Jul 02, 2012 54. Comments: This is an economic and cultural disaster for California. Besides the drastic loss of personal liberty and private property rights, this entire process is being conducted without the consent of the general population. Zero effort has been put forth into public awareness via Radio, television or newsprint education and information. 55. Name: Beth Calvert on Jul 02, 2012 Comments: Name: Vince Wright on Jul 02, 2012 56. Comments: 57. Name: Ann Price on Jul 02, 2012 Comments: Name: Anonymous on Jul 02, 2012 58. Comments: 59. Name: Anonymous on Jul 02, 2012 Comments: 60. Name: Ortrud Witt on Jul 02, 2012 Comments: The American people are tired of having politicians and bureacrats fast shuffling self serving legislation and plans at us. 61. Name: Ron Kilmartin on Jul 02, 2012 Comments: This deserves a one-year or so Bay-Area wide media blitz on TV and internet and newspapers, conducted under the supervision of leaders from the Tea Party and associated organizations, not MTC-ABAG or their bureaucrats and NGOs. . This plan is to substitute an entirely different form of local government in which we the people have no say. How could such a scheme be proposed in America? The idea of bureaucrats and NGOs sitting in a council of dictators is straight out of the tyrannical governing structure of the old Soviet Union - soviets - unelected councils run by all-powerful members of the Communist Party. 62. Name: Al Pori on Jul 02, 2012 Comments: Name: Jeffrey Wolk on Jul 02, 2012 63. Comments: Name: Russell Brabec on Jul 02, 2012 64. Comments: 65. Name: Barbara Decker on Jul 02, 2012 Comments: The citizens request that an extension of the plan so more citizens can learn what is happening. Too many people have been kept in the dark and need to know what is happening.

66. Name: Glenn Steiding on Jul 02, 2012 Comments: This scheme will never work unless an Asteroid hits the planet, wipes out all human life, and after eons, the Earth is repopulated with mindless clones that want to be led around by the nose.

67. Name: Margie Liberty on Jul 02, 2012 Comments: This plan is government run amuck and must not be allowed to go any further. The people will rise up.

68. Name: Susan Mister on Jul 02, 2012 Comments: 69. Name: Larry Busboom on Jul 02, 2012 Comments: 70. Name: Jan Mitchell on Jul 02, 2012 Comments: 71. Name: Georgine Scott-Codiga on Jul 02, 2012 Comments: Name: Jennifer L Bright on Jul 02, 2012 72. Comments: 73. Name: Carl Hyndman on Jul 02, 2012 Comments: Name: Anonymous on Jul 02, 2012 74. Comments: 75. Name: Jerlyn Hollars on Jul 02, 2012 Comments: The most scarey words you'll ever hear, I'm from the government and I'm here to help." Keep the government out of my life! Enough already. 76. Name: Dr. Ronald Corselli on Jul 02, 2012 Comments: 77. Name: Dale Jelsema on Jul 02, 2012 Comments: This plan needs to be reviewed by local cities as to how to pay all the additional cost to taxpayers. 78. Name: Cynthia Wehbe on Jul 02, 2012 Comments: 79. Name: Peter Lambertson on Jul 02, 2012 Comments: 80. Name: Anonymous on Jul 02, 2012 Comments: In the name of individual freedom for every citizen of the Bay Area, I protest this blatant usurpation of power by unelected officials who wish to dictate how the rest of us should live. 81. Name: Anonymous on Jul 02, 2012 Comments: 82. Name: Sharron D. Nuno on Jul 02, 2012 Comments:

83. Name: Robert Fulton on Jul 02, 2012 Comments: ABAG and MTC members, respectfully, we fellow citizens request each of you keep in mind, that an individual's right to his/her property is the foundation upon which The Constitution of the United States of America sits...act to help preserve that right for us and our children and their children.

Robert Fulton, San Jose.

84.	Name: Theresa Curt on Jul 02, 2012 Comments:
85.	Name: Donald R. Connors on Jul 02, 2012 Comments:
86.	Name: Mihai Bulea on Jul 02, 2012 Comments:
87.	Name: Michael Foley on Jul 02, 2012 Comments:
88.	Name: Leslie E Baker on Jul 02, 2012 Comments:
89.	Name: Nancy Foley on Jul 02, 2012 Comments:
90.	Name: Dennis Cookinham on Jul 02, 2012 Comments:
91.	Name: Anonymous on Jul 02, 2012 Comments:
92.	Name: Glenda Kitchel on Jul 02, 2012 Comments: WE DO NOT NEED THIS! YOU NEED TO PUT A STOP TO THIS AGENDA 21 NOW!
93.	Name: Brian R Cameron on Jul 02, 2012 Comments:
94.	Name: Mary Buntz on Jul 02, 2012 Comments:
95.	Name: David Torrisi on Jul 02, 2012 Comments:
96.	Name: Robert P. Marshali on Jul 02, 2012 Comments: ABAG & MTC should be elected by the people & not appointed.
97.	Name: Anonymous on Jul 02, 2012 Comments:
98.	Name: Bruce Johnson on Jul 02, 2012 Comments:
99.	Name: Greg Gardner on Jul 02, 2012 Comments:
100.	Name: Lalla Stark on Jul 02, 2012 Comments: our voices must be heardreject the draft

101.	Name: John Greenagel on Jul 02, 2012 Comments: The entire process by which ABAG and MTC have developed and promoted the massive power grab that is Plan Bay Area is shameful.
102.	Name: Vickie Swing on Jul 02, 2012 Comments:
103.	Name: Charles Walker on Jul 02, 2012 Comments:
104.	Name: Christopher H. Brown on Jul 02, 2012 Comments:
105.	Name: Kathleen M Thomson on Jul 02, 2012 Comments:
106.	Name: Dennis Thomson on Jul 02, 2012 Comments:
107.	Name: Raymond Sarakaitis on Jul 02, 2012 Comments: The far reachings of this proposal has such stifling effects on personal freedoms. This whole concept is so unbelievable. The "Politburo" can't be far behind.
108.	Name: Anonymous on Jul 02, 2012 Comments: What happened to our freedoms? We are a free nation until ABAG; please look to individual rights and not collectivism
109.	Name: Carol Tomlinson on Jul 02, 2012 Comments:
110.	Name: Anonymous on Jul 02, 2012 Comments:
111.	Name: Anonymous on Jul 02, 2012 Comments:
112.	Name: Lewis Greene on Jul 02, 2012 Comments: NO NO NO
113.	Name: Amanaa Rendall on Jul 02, 2012 Comments:
114.	Name: Diana G Huenerbein on Jul 02, 2012 Comments:
115.	Name: Anonymous on Jul 02, 2012 Comments:
116.	Name: Jacqueline Morris on Jul 02, 2012 Comments: I object to this entire plan as well as the way it is being put in placefew or our citizens are even aware of what is planned
117.	Name: Verlayne Cave on Jul 02, 2012 Comments:
118.	Name: Robert White on Jul 02, 2012 Comments:

119.	Name: Debra Tash on Jul 02, 2012 Comments: Don't make the mistake of adopting this power grabbing plan.
120.	Name: Leland And Mary Stanley on Jul 02, 2012 Comments:
121.	Name: Sara Volking on Jul 02, 2012 Comments:
122.	Name: Fred Volking on Jul 02, 2012 Comments:
123.	Name: Glenda Kitchel on Jul 02, 2012 Comments: Stop thisOne Bay area plan, We don't want it! It is wrong for freedom loving people!
124.	Name: Anonymous on Jul 02, 2012 Comments: The plan as proposed will severely restrict our freedom and degrade our quality of life. It will have a negative impact on individuals and families in their daily living with NO scientifically proven benefit to the environment!
125.	Name: LA VERNE D. OYARZO on Jul 02, 2012 Comments:
126.	Name: William Moniz on Jul 02, 2012 Comments:
127.	Name: James S. Flippen on Jul 02, 2012 Comments: I always favor fewer rules and regulations. This one appears to be dangerous
128.	Name: Donna P. Gillies on Jul 02, 2012 Comments: It is absolutely necessary for we, the people, to have complete, open and factual information as well as time to digest and discuss the adoption of the Plan Bay Area. Environmental concerns are not an excuse to transfer power from the people and their duly elected representatives unless those being represented agree to that transfer of power. The fast track approach for adoption of the EIR raises a lot of red flags regarding the honesty and true intent of this movement.
129.	Name: Anonymous on Jul 02, 2012 Comments:
130.	Name: Charles Quisenberry on Jul 02, 2012 Comments:
131.	Name: Donna P. Gillies on Jul 02, 2012 Comments: It is absolutely necessary for we, the people, to have complete, open and factual information as well as time to digest and discuss the adoption of the Plan Bay Are. Environmental concerns are not an excuse to transfer power from the people and their duly elected representatives unless those being represented agree to that transfer of power. The fast track approach for adoption of the EIR raises a lot of red flags regarding the honesty and true intent of this movement.
132.	Name: Marshall W Jackman on Jul 02, 2012 Comments: This violation of private property rights and Constitutional principals must stop'
133.	Name: Jean Ryan on Jul 02, 2012 Comments:
134.	Name: Olivia on Jul 02, 2012 Comments:

135.	Name: Olivia on Jul 02, 2012 Comments:
136.	Name: Deanna Thompson on Jul 02, 2012 Comments:
137.	Name: Franklin Henry on Jul 02, 2012 Comments:
138.	Name: Margaret Murguia on Jul 02, 2012 Comments: STOP "One Bay Area Plan". It will destroy our lives and freedoms.
139.	Name: Michael Shadwick on Jul 02, 2012 Comments:
140.	Name: Fredrick Hills on Jul 02, 2012 Comments: I'm not willing to surrender my rights and liberties to any bureaucrat, government or politician or trust them to protect them either. History has proven that they usually fail at it miserably
141.	Name: Denise K. Gianni on Jul 02, 2012 Comments: Give me liberty or give me death!! I will die standing, NOT on my knees, begging 'please'!! STOP BAY AREA PLAN NOW!
142.	Name: Anonymous on Jul 02, 2012 Comments: Freedom!!!!!!!!!!
143.	Name: Michael Black on Jul 02, 2012 Comments:
144.	Name: Suzanne Rodriguez on Jul 02, 2012 Comments:
145.	Name: Patt Brown on Jul 02, 2012 Comments:
146.	Name: Ken Brown on Jul 02, 2012 Comments:
147.	Name: George Bruner, Sr. on Jul 02, 2012 Comments:
148.	Name: Michelle Kralovec on Jul 02, 2012 Cornments: I absolutely support this petition. One Bay Area/ Agenda 21 has gone way too far and needs to stop! It goes aginst the fundamental rights of ever USA Citizen our property rights and our freedoms
149.	Name: Anonymous on Jul 02, 2012 Comments:
150.	Name: Anonymous on Jul 02, 2012 Comments:
151.	Name: Nanci Quinn on Jul 02, 2012 Comments:
152.	Name: Philip Graf on Jul 02, 2012

Name: Philip Graf on Jul 02, 2012 Comments: We, the voters do NOT want political power shifted from our elected representatives to unelected bureaucrats -- all

without adequate public input!

153.	Name: Robert Hauser on Jul 02, 2012 Comments: We have had to endure far too much sovietization of our lives by numerous oligarchies of fat salaried unelected bureaucrats as isthank you just the same. In just so many wordsABAG and MTC, kindly get the Hell out of our faces, out of our lives and out of our billfolds, you are trespassing on our Constitution, butt out now!!!!!!
154.	Name: Daniel Prior on Jul 02, 2012 Comments:
155.	Name: Ken Paxton on Jul 02, 2012 Comments: I wish the people of the nine bay area counties knew about this plan.
156.	Name: Roberta Torres on Jul 02, 2012 Comments:
157.	Name: Stephen McDougali on Jul 02, 2012 Comments:
158.	Name: Brian Boone on Jul 02, 2012 Comments: Stop the maddness and fix the budget
159.	Name: Steve Meyer on Jul 02, 2012 Comments: Lets stop this from happening it is not good for our counrty. To much power will be transfered to dishonest non-elected officials with agenda's.
	God Bless
160.	Name: Ann Miller on Jul 02, 2012 Comments:
161.	Name: Marilee Wilson on Jul 02, 2012 Comments: I dissaprove of the EIR draft
162.	Name: Anonymous on Jul 02, 2012 Comments:
163.	Name: Harry A Phillips on Jul 02, 2012 Comments:
164.	Name: Lois Kleinkauf on Jul 02, 2012 Comments: I wish to retain local control concerning my life and property - not regional, state, national, or international.
165.	Name: Lorelyn Hechtman on Jul 02, 2012 Comments: If the bureaucrates are not open/ responsive/ interested in all ideas and suggestions it strongly suggests they have their own agenda, want to be left alone to do what they want and are not representative of the fellow Bay Area citizens so I do not want them to speak/ or to do ANY THING on my behalf. Unrestricted, unwanted, uninformed on what is wished for the freedom appreciating general public. Do not have another collective bureau telling the tax payers what and when to do Anything. Desolve the Committeego home and encourage collective good minds to go after what is best for the vast, educated, legal minds that want the Bay Area to function safely for centuries.
166.	Name: John Irwin on Jul 02, 2012

Comments: All their plans are a result of UN Agenda 21 implementation, which is unconstitutional but agreed to by Hillary Clinton and the past four Presidents. This is one of the major goals of the Tea Party, of which I am a leader, to dismantle. It is being forced on unsuspecting City and County Governments by the Builder-berg group of 120 multi Billionaires who want one world government. All of which is being performed under the Radar. If you are not familiar with the Scheme, I would gladly bring you up to speed.

John

167.	Name: Dan The Man on Jul 02, 2012 Comments:
168.	Name: Tammy Heimgartner on Jul 02, 2012 Comments: This kind of deception and quick movement is what is hurting our country. Glad for my friend who is more dialed in than I in capturing this type of undisclosed change in our society!
169.	Name: Regina Vann on Jul 02, 2012 Comments:
170.	Name: Ari Goldberg on Jul 02, 2012 Comments:
171.	Name: Michael Paonessa on Jul 02, 2012 Comments:
172.	Name: Anonymous on Jul 02, 2012 Comments:
173.	Name: Barbara White on Jul 02, 2012 Comments:
174.	Name: BARRY N. NATHAN on Jul 02, 2012 Comments:
175.	Name: BARRY N. NATHAN on Jul 02, 2012 Comments:
176.	Name: Dennis Kitainik on Jul 02, 2012 Comments:
177.	Name: David Chaney on Jul 02, 2012 Comments: Each county and city needs to retain control, via elected officials, of their county and city. We do not need more tyranny at the county and city levels that we are already experiencing at the state and federal levels.
178.	Name: Richard James on Jul 03, 2012 Comments:
179.	Name: Anonymous on Jul 03, 2012 Comments:
180.	Name: Anonymous on Jul 03, 2012 Comments:
181.	Name: Warren Gibson on Jul 03, 2012 Comments:
182.	Name: Jennifer Singh on Jul 03, 2012 Comments:
183.	Name: Anonymous on Jul 03, 2012 Comments: The EIR is inadequate. The population figures used were not sourced properly, and they did not give a range of potential population figures.

184.	Name: Anonymous on Jul 03, 2012 Comments:
185.	Name: Robert Pegram on Jul 03, 2012 Comments: Unelected bureaucrats should not have power to take freedom from citizens.
186.	Name: Deborah Woehrle on Jul 03, 2012 Comments:
187.	Name: Mark S Lerner on Jul 03, 2012 Comments:
188.	Name: Anonymous on Jul 03, 2012 Comments:
189.	Name: Henry Kachuck on Jul 03, 2012 Comments: Local Citizens need to decide how to best use local PUBLIC and PRIVATE land. PERIOD!!!!
190.	Name: Alexa Abrishamian on Jul 03, 2012 Comments: It is an outrage that such a plan, that affects peoples' lives at every level, is being rushed through. The people of the Bay Area must be given an opportunity to learn about the plan and let their voices be heard!!!!!
191.	Name: Anonymous on Jul 03, 2012 Comments:
192.	Name: Roxanne Albertoli on Jul 03, 2012 Comments:
193.	Name: Robert Dietrich on Jul 03, 2012 Comments: More time is needed!!!
194.	Name: Janice Allgower on Jul 03, 2012 Comments: Let us just BESTOP trying to take all our rights from us!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!
195.	Name: Doug Forsyth on Jul 03, 2012 Comments:
196.	Name: Amy Tran on Jul 03, 2012 Comments:
197.	Name: Sharon Reinfeld on Jul 03, 2012 Comments:
198.	Name: Beverly Potter on Jul 03, 2012 Comments: We need more public comment.
199.	Name: Nina Ortega on Jul 03, 2012 Comments:
200.	Name: Kirsty Burns on Jul 03, 2012 Comments:

201.

Name: Anonymous on Jul 03, 2012 Comments: I never got to vote yay or nay for this plan because none of the questions concerned citizens were asking ever got answered. They were standard questions that many of us had regarding where the money would come from, why special environmental exemptions for developers since this is all being done under an environmental improvement bill, what the enormous growth numbers were based on since companies and businesses are leaving the state for better economic opportunities. This plan in my opinion is the start of creating ghettos since they are highly subsidized, have no funding from the local economy to keep them maintained after they are built. Additionally, this plan requires the confiscation of private property without any due process for the owners or the local citizens. For something this huge hardly anyone I have tried to speak to about this have no idea what is going on. The media is silent on this effort and I can't understand why the rush to get this all done behind the backs of California citizens. You need to engage all citizens by getting this out to the media so everyone can know what is being proposed and decided on. Citizens are busy but they will stop and listen when you engage them properly. The ones I've seen attend the meetings and try to get answers from the agencies were met with overwhelming opposition from the agencies as if the job of the agencies was just to give lip service to anyone who dissented. The agencies provided no response to any dissenting questions. However, they always had answers for those who showed they were for their plans. The dissenters far outweighed the supporters at the meetings. The agencies involved in the meetings never intended to answer questions from the concerned public. The proof is that the concerned public has not received any answers to their reasonable questions.

202.	Name: Susan Morse on Jul 03, 2012 Comments:
203.	Name: Chuck Costello on Jul 03, 2012 Comments: This project needs to be delayed until the public is properly informed!!
204.	Name: Diane Costello on Jul 03, 2012 Comments:
205.	Name: Burton E. Worrell on Jul 03, 2012 Comments:
206.	Name: Vickie Bell on Jul 03, 2012 Comments: Incomplete and inadequate draft EIR. Deadline needs to be extended!
207.	Name: Larry Yelowitz, PhD on Jul 03, 2012 Comments: This blatant power grab by ABAG and MTC must be subjected to painstaking scrutiny by the citizens affected.
208.	Name: Richard Loutensock on Jul 03, 2012 Comments:
209.	Name: JAMES A MILLER on Jul 03, 2012 Comments: Stop this dictatorship of telling me how to live because you liberials think (if thats even a possibility that you could ever think about anything except what your Berkeley liberial professors taught you) is best for meif you don't like freedom, head for Cuba or Iranget the damn bulishit government out of my lifeassholeswhat abunch of sorry people
210.	Name: Anonymous on Jul 03, 2012 Comments:
211.	Name: Gary Edwards on Jul 03, 2012 Comments:
212.	Name: Anonymous on Jul 03, 2012 Comments:
213.	Name: Rosslynne McCullough on Jul 03, 2012 Comments: Keep Saratoga an ABAG free zone. Thank you for all you do for our community.
214.	Name: Jack McCullough on Jul 03, 2012 Comments: Keep the UN out of my state and country.
215.	Name: Anonymous on Jul 03, 2012 Comments:
216.	Name: Phyllis A McKenna on Jul 03, 2012

Comments: This plan limits our freedom and is enacted without the knowledge or votes of the public by unelected bureaucrats. No, no,no!!!

217.	Name: Nancy Stevens on Jul 03, 2012 Comments:
218.	Name: Glenn Gelineau on Jul 03, 2012 Comments: This whole One Bay Area Plan has been flawed right from the get go, in terms of public engagement.
219.	Name: Elizabeth Mccarthy on Jul 03, 2012 Comments: Many Americans fought and died for liberty and the Constitution which guarantees life,liberty and the pursuit of happiness. Property rights must be protected and we must be protected from legislation which puts environment above individual rights and freedom. What value is citizenship if those rights guaranteed by the Constitution are trampled?
220.	Name: Anonymous on Jul 03, 2012 Comments: we do not need another layer of regional government or control
221.	Name: Paul R. Scherer on Jul 03, 2012 Comments:
222.	Name: Brandon Wilborn on Jul 03, 2012 Comments:
223.	Name: Jeff Smith on Jul 03, 2012 Comments:
224.	Name: Jeff Smith on Jul 04, 2012 Comments:
225.	Name: Lowell Johnson on Jul 04, 2012 Comments: Stop the insanity, before I have to move to Russia or China to have more personal liberty!
226.	Name: Anonymous on Jul 04, 2012 Comments:
227.	Name: Frances Hills on Jul 04, 2012 Comments: I want choices and have elected officials to represent me. I do not want unelected officials to make those decisions.
228.	Name: Linda Paine on Jul 04, 2012 Comments:
229.	Name: Barbara Kronewitter on Jul 04, 2012 Comments:
230.	Name: Jim Sanders on Jul 04, 2012 Comments: Please stop regulating away our inalienable rights
231.	Name: Jaime Castro on Jul 04, 2012 Comments:
232.	Name: Pat Ferguson on Jul 04, 2012 Comments: I have attended several meetings of OneBayArea. In looking at the plan it is clear it was done quickly to push it through without a clear look at the environmental impact of this plan on individual's health and welfare, especially of the poor and minority communities.
	Their plans are clearly incomplete at best, clearly not adaquately addressing many environmental issues within the cities and areas near to Bart.

As a former Social Worker, I see mental health issues arriving from their plans that they did not even address. Ever try to raise a baby or small children in a high-rise or high density area? Not fun or healthy for mom or kids. Stress levels under such conditions incrase greatly.

I hope you delay the implementation of this plan until the full impact on the environment within the cities and adverse health affects on poor women and children are fully address. Over crowding increases stress levels and is particularly dangerous to pregnant women, the elderly and small children.

Let's not try to do something to help the poor and end up endangering their health and the health of our urban environments.

233.	Name: Larry E. Mosler on Jul 04, 2012 Comments: I will sign it.
234.	Name: JERRY JORDAN on Jul 04, 2012 Comments: GOOD WORK!!!
235.	Name: Anonymous on Jul 04, 2012 Comments:
236.	Name: Joy on Jul 04, 2012 Comments: Thanks,
237.	Name: Haran on Jul 04, 2012 Comments: Thanks,
238.	Name: Jeff Smith on Jul 04, 2012 Comments:
239.	Name: Jeff Smith on Jul 04, 2012 Comments:
240.	Name: Laurie Jones on Jul 05, 2012 Comments: For the people by the people. Let the peoples voices be heard. No more behind closed doors decisions. This is a democracy not dictatorship, socialism or communism !~!!
241.	Name: Aubrey Freedman on Jul 05, 2012 Comments: We need more time to find out what's going on here. One size fits all may not work for everyone's lifestyle. Please extend the deadline for public comment.
242.	Name: Phyllis Couper on Jul 05, 2012 Comments: the draft EIR is incomplete. It should be rejected and a new review process put in place for maximum review and input by the public.
243.	Name: Janet Maiorana on Jul 05, 2012 Comments: I oppose Plan Bay Area on too many grounds to list here. If the plan is good, why are communities being threatened with loss of rightful return to sourch funds?
244.	Name: Starchild (At-Large Representative, Libertarian Party Of California Executive Committee) on Jul 05, 2012 Comments: Freedom is the answer. What's the question? No, really, what's the question?
245.	Name: Christopher Sordello on Jul 05, 2012 Comments:
246.	Name: Robert Wright on Jul 05, 2012 Comments:
247.	Name: Dave LeClercq on Jul 05, 2012 Comments:

248.	Name: Anonymous on Jul 05, 2012 Comments:
249.	Name: Anonymous on Jul 05, 2012 Comments:
250.	Name: Randy Dreiling on Jul 05, 2012 Comments: Don' Tread On Me
251.	Name: Elias A. Ramos on Jul 05, 2012 Comments:
252.	Name: Anonymous on Jul 05, 2012 Comments:
253.	Name: Jeffrey Hunter on Jul 05, 2012 Comments: I detest our California state and local governments.
254.	Name: Wayne Rundle on Jul 05, 2012 Comments:
255.	Name: Wayne Rundle on Jul 05, 2012 Comments:
256.	Name: Wayne Rundle on Jul 05, 2012 Comments:
257.	Name: IRVIN E. CHAMBERS on Jul 05, 2012 Comments: Read all about this in the book
	ECO TYRANNY
	BY BRIAN SUSSMAN
258.	Name: Anonymous on Jul 05, 2012 Comments:
259.	Name: Anonymous on Jul 05, 2012 Comments: Welcome to Xalifornia!
260.	Name: Fernando Navarro on Jul 05, 2012 Comments: you'll have to wrench freedom from my dead cold hands before i allow anyone to passively build " Auschwitz" around me!!!!
261.	Name: William Clark on Jul 05, 2012 Comments: Keep up the good work! Private property and individual Liberty are too important to let go of.
262.	Name: Anonymous on Jul 05, 2012 Comments:
263.	Name: Rosemary Sanders on Jul 05, 2012 Comments:
264.	Name: Mike Pavlovich on Jul 05, 2012 Comments:

265.	Name: Kimberly Himes on Jul 05, 2012 Comments: This agenda is not right we live in American not Europe. We have rights and freedoms this agenda steals everything that
	america stands for. Stop this now we the people do not agree with this
266.	Name: Judith A. Bellack on Jul 05, 2012 Comments:
267.	Name: Tony Michael on Jul 05, 2012 Comments: I agree wholeheartedly with this petition!
268.	Name: Larry White on Jul 05, 2012 Comments:
269.	Name: Anonymous on Jul 05, 2012 Comments:
270.	Name: Edmund F Goedde on Jul 05, 2012 Comments: Our elected city and county leaders are responsible for our area. This power may not be transferred to an unelected body.
271.	Name: Larry White on Jul 05, 2012 Comments:
272.	Name: Donna Andersen on Jul 05, 2012 Comments:
273.	Name: John Vonhof on Jul 05, 2012 Comments:
274.	Name: Alisa Ortlieb on Jul 05, 2012 Comments:
275.	Name: Susan Caudill on Jul 05, 2012 Comments:
276.	Name: AMARCY BERRY on Jul 05, 2012 Comments: I am not at all satisfied with the plans to transfer control of transportation, land use, and job opportunities to unelected bureaucrats. A glimpse of the future behavior to be expected is the surreptitious way this plan is being pushed upon us.
277.	Name: Melanie J. Kent on Jul 05, 2012 Comments:
278.	Name: Tim Turner on Jul 05, 2012 Comments:
279.	Name: Shirlee Pierce on Jul 05, 2012 Comments: The most dangerous aspect of this plan is that because these people are not elected, they cannot, and will not be held accountable for their actions. They are not subject to recall nor is there any other remedy available to us to get rid of them.
280.	Name: Anonymous on Jul 05, 2012 Comments: Government should adjust to user input especially since it is our money that drives this.
281.	Name: Anonymous on Jul 05, 2012 Comments:

282. Name: Robert White on Jul 05, 2012

Comments: We don't need any more government bureaucrats running our lives, telling us what to do and stealing our freedoms.

283.	Name: Anonymous on Jul 05, 2012 Comments:
284.	Name: Anonymous on Jul 05, 2012 Comments:
285.	Name: Tina Shub on Jul 05, 2012 Comments:
286.	Name: Charles Cagnon on Jul 05, 2012 Comments: One Bay Area is intellectually and morally unfounded and has been pushed in an unethical fashion. Regional government is not self-government.
287.	Name: Charles Cagnon on Jul 05, 2012 Comments: One Bay Area is intellectually and morally unfounded and has been pushed in an unethical fashion. Regional government is not self-government.
288.	Name: Michael Denny on Jul 05, 2012 Comments: Keep the power with the people and property ownersthis is nothing but a power grab under cover of the already discredited fake science/religion of environmentalism.
289.	Name: Francoise Fielding on Jul 05, 2012 Comments:
290.	Name: Anonymous on Jul 06, 2012 Comments:
291.	Name: F. D. Crutchfield on Jul 06, 2012 Comments:
292.	Name: Jan Pinney on Jul 06, 2012 Comments: Allow citizens to provide input to the plan that is in opposition to the pre-determined "citizen input" developed by beaurocrats, rather than from grass-roots citizen input.
293.	Name: Janet Songey on Jul 06, 2012 Comments:
294.	Name: Art Songey on Jul 06, 2012 Comments:
295.	Name: Jordan Songey on Jul 06, 2012 Comments:
296.	Name: Carl Hyndman on Jul 06, 2012 Comments:
297.	Name: Brent Songey on Jul 06, 2012 Comments:
298.	Name: Justine Songey on Jul 06, 2012 Comments:

299.	Name: Anonymous on Jul 06, 2012 Comments:
300.	Name: Bev Barnes on Jul 06, 2012 Comments:
301.	Name: Denis F. Quinn on Jul 06, 2012 Comments:
302.	Name: Norma Coe on Jul 06, 2012 Comments:
303.	Name: Ray And Maralyn Killorn on Jul 06, 2012 Comments: We want government and associated planners out of the Bay Area.
304.	Name: Tom Woehrle on Jul 06, 2012 Comments:
305.	Name: James Seif on Jul 06, 2012 Comments:
306.	Name: Jennifer Delany on Jul 06, 2012 Comments: stop Agenda 21
307.	Name: Jennifer Delany on Jul 06, 2012 Comments:
308.	Name: Dan Roberts on Jul 06, 2012 Comments:
309.	Name: Terry Gossett on Jul 06, 2012 Comments:
310.	Name: Dennis Garidel on Jul 06, 2012 Comments:
311.	Name: Christopher J Pareja on Jul 06, 2012 Comments: Please extend the deadline for the draft environmental impact report to allow proper time for public input.
312.	Name: George Tash on Jul 06, 2012 Comments:
313.	Name: Jennifer Tash-Amodei on Jul 06, 2012 Comments:
314.	Name: Ivan Amodei on Jul 06, 2012 Comments:
315.	Name: Rachel Janowicz on Jul 06, 2012 Comments:
316.	Name: Adam Tash on Jul 06, 2012 Comments:
317.	Name: Joey Porter on Jul 06, 2012

### Comments:

318.	Name: Jacque Porter on Jul 06, 2012 Comments:
319.	Name: Pete Van Rijn on Jul 06, 2012 Comments:
320.	Name: Mike McCullough on Jul 06, 2012 Comments:
321.	Name: Bob Mendoza on Jul 06, 2012 Comments: I agree with all of the comments
322.	Name: Bill Moniz on Jul 06, 2012 Comments: This Plan does not need to be fast tracked, it is already going too fast for most people to become aware of the impact of your decisions. Perhaps that is the idea, to keep the public in the dark while the unelected bureaucrats make decisions that affect our lives. Enough is enough.
323.	Name: Connie on Jul 06, 2012 Comments:
324.	Name: Connie on Jul 06, 2012 Comments:
325.	Name: Mark Ackerman on Jul 06, 2012 Comments:
326.	Name: Mary Isaacs on Jul 06, 2012 Comments:
327.	Name: Glenn Smentek on Jul 06, 2012 Comments: stop the further Socialization of California
328.	Name: Joseph Madre on Jul 06, 2012 Comments:
329.	Name: Paul Kent on Jul 06, 2012 Comments:
330.	Name: Sharon Giottonini on Jul 06, 2012 Comments:
331.	Name: Leslie Tozzini on Jul 06, 2012 Comments:
332.	Name: Douglas Tozzini on Jul 06, 2012 Comments:
333.	Name: Barbara Decker on Jul 06, 2012 Comments:
334.	Name: James M Croft on Jul 06, 2012 Comments: I suipport the efforts to keep goverment out of private property rights

335.	Name: Chris Decker on Jul 06, 2012 Comments:
336.	Name: Rachel Decker on Jul 06, 2012 Comments:
337.	Name: Al Vittek on Jul 06, 2012 Comments:
338.	Name: Gini Spicer on Jul 06, 2012 Comments:
339.	Name: Shannon Russell on Jul 06, 2012 Comments:
340.	Name: Mark Russell on Jul 06, 2012 Comments:
341.	Name: Michael Spicer on Jul 06, 2012 Comments:
342.	Name: Loralee on Jul 06, 2012 Comments:
343.	Name: Diana G Huenerbein on Jul 06, 2012 Comments:
344.	Name: Anonymous on Jul 06, 2012 Comments:
345.	Name: Thomas James on Jul 06, 2012 Comments:
346.	Name: Anonymous on Jul 06, 2012 Comments:
347.	Name: Susan Hart on Jul 06, 2012 Comments: Today Green means "green on the outside; red on the inside." What people used to think it meant was that ordinary citizens set the course for our own individual preferences and control of our property. Now it means the elected and unelected officials wrest control out of your hands in the name of preserving open space and saving land for your children while they take control and set the agenda and limit your freedom instead of limiting government.
348.	Name: Carol Pascoe on Jul 06, 2012 Comments:
349.	Name: Donald L. Williams on Jul 06, 2012 Comments:
350.	Name: Thomas Luekens on Jul 06, 2012 Comments:
351.	Name: Norman H. Reece on Jul 06, 2012 Comments:
352.	Name: Norman H. Reece on Jul 06, 2012 Comments:

353.	Name: John Gordon on Jul 06, 2012 Comments:
354.	Name: Jose Omelas on Jul 06, 2012 Comments: It seems all the data you acquire is "cherry picked" to support your previous assumptions
355.	Name: Allan Ward on Jul 06, 2012 Comments:
356.	Name: Sharon Marston Erickson on Jul 06, 2012 Comments: Don't give up. We must preserve our God given liberty!
357.	Name: Mary Spicer on Jul 06, 2012 Comments:
358.	Name: Virginia Roush on Jul 06, 2012 Comments:
359.	Name: Joseph Barocio on Jul 06, 2012 Comments:
360.	Name: Linda J Homen on Jul 06, 2012 Comments:
361.	Name: Francis M Leo on Jul 06, 2012 Comments:
362.	Name: Francis P Homen-Leo on Jul 06, 2012 Comments:
363.	Name: Tom Buckless on Jul 06, 2012 Comments: we don't want your commie BS.
364.	Name: Jeffrey Wolk on Jul 06, 2012 Comments:
365.	Name: Robert Bradford on Jul 06, 2012 Comments: Long live Prop. 13
366.	Name: Pamela George on Jul 06, 2012 Comments: I ask that ABAG and MTC reject the draft EIR as incomplete and inadequate and to extend the time for PUBLIC comment on the next draft. Thank you.
367.	Name: Rick Hills on Jul 06, 2012 Comments:
368.	Name: Laurie Duff on Jul 06, 2012 Comments:
369.	Name: Anonymous on Jul 06, 2012 Comments: stop trying to control my life!
370.	Name: Anonymous on Jul 06, 2012 Comments:

371.	Name: Michael E. Hancock on Jul 06, 2012 Comments:
372.	Name: Donald Sylvia on Jul 06, 2012 Comments:
373.	Name: John Parkhurst on Jul 06, 2012 Comments:
374.	Name: Kathleen DiStasio on Jul 06, 2012 Comments:
375.	Name: Anonymous on Jul 06, 2012 Comments: I am in full favor of this that protects our property rights and rights as USA citizens!
376.	Name: Jack Wagstaff on Jul 06, 2012 Comments: this is yet more government and restriction of our fought for freedom being eroded.
377.	Name: Mark Polhemus on Jul 06, 2012 Comments:
378.	Name: Michael Bowcut on Jul 06, 2012 Comments:
379.	Name: Kimberly Abold on Jul 06, 2012 Comments:
380.	Name: Leland And Mary Stanley on Jul 06, 2012 Comments:
381.	Name: James Radetich on Jul 06, 2012 Comments:
382.	Name: Margie Liberty on Jul 06, 2012 Comments:
383.	Name: Imogene Ayres on Jul 06, 2012 Comments: "The world is run by those who show up."
384.	Name: Anonymous on Jul 06, 2012 Comments:
385.	Name: Steven L. Scheye on Jul 06, 2012 Comments: Damn Facist bureaucrat pigs
386.	Name: Lynn H. Hiden on Jul 06, 2012 Comments:
387.	Name: Thomas Wackerman on Jul 06, 2012 Comments:
388.	Name: Patt Brown on Jul 06, 2012 Comments:

389.	Name: Ken Brown on Jul 06, 2012 Comments:
390.	Name: Jeff Hanna on Jul 06, 2012 Comments:
391.	Name: Carol T Singer on Jul 06, 2012 Comments:
392.	Name: Carolyn McCain on Jul 06, 2012 Comments:
393.	Name: Lani Watkins on Jul 06, 2012 Comments: ABAG and MTC are not my elected representatives and any EIR to transfer power to a NGO is not acceptable.
394.	Name: Marjory Parker on Jul 06, 2012 Comments:
395.	Name: Suzanne Silk on Jul 06, 2012 Comments: As a citizen of the Bay Area I demand a complete review and comments by citizens, not just bureaucrats and citizens on one side of the argument.
396.	Name: Darlene Anastas on Jul 06, 2012 Comments: Please rethink this move to take away personal freedoms at a critical time when legislation such as this is becoming more intrusive than ever before. This is a poorly conceived idea and should not be implimented. Leave critical decisions in the hands of elected officials who answer to the voting public.
397.	Name: FRANK MONTICELLI on Jul 06, 2012 Comments:
398.	Name: Joyce Elaine Esakson on Jul 06, 2012 Comments:
399.	Name: Susan Mueller on Jul 06, 2012 Comments:
400.	Name: Anonymous on Jul 06, 2012 Comments:
401.	Name: Andy And Kerry Patterson on Jul 06, 2012 Comments: Let's get out of personal lives and mind our own business. We are for leaving the Government alone, so we would like the Government to leave Us alone. One Bay Area Plan is astounding like Communism. We are free people not subjects to the Government.
402.	Name: Randy L. Kyle on Jul 06, 2012 Comments: It is long past time to put both state and federal governments back in their box. Dismantle the eco-communist bureaucracy NOW.
403.	Name: Randy L. Kyle on Jul 06, 2012 Comments: It is long past time to put both state and federal governments back in their box. Dismantle the eco-communist bureaucracy NOW.
404.	Name: Linda Jumangit on Jul 07, 2012 Comments: Haste makes you an idiot. There is always time to make a mistake but never any time to correct it.
405.	Name: Howard E. SWain on Jul 07, 2012 Comments: I cannont believe there are still people stupid enough to think man made global warming is a problem. There is tons of

evidence to prove the whole thing is a a fraudulent hoax.

406.	Name: Johanna Coble on Jul 07, 2012 Comments:
407.	Name: Garald Palazzi on Jul 07, 2012 Comments:
408.	Name: Deborah Kerwin-Peck on Jul 07, 2012 Comments:
409.	Name: Dwight Swobe on Jul 07, 2012 Comments:
410.	Name: DON CRADDUCK on Jul 07, 2012 Comments:
411.	Name: Ilene Meyers on Jul 07, 2012 Comments:
412.	Name: Ben Woods on Jul 07, 2012 Comments: One Bay Area Plan is a bad idea for everyone who has to pay for it, let alone live in it!
413.	Name: Gary Springer on Jul 07, 2012 Comments: abag & mtc hide in the shadows & the city officials are afraid to let there citizens know whats going & the consequences.
414.	Name: Eliot Chavez on Jul 07, 2012 Comments:
415.	Name: Michael Boworth on Jul 07, 2012 Comments:
416.	Name: Anonymous on Jul 07, 2012 Comments:
417.	Name: Anonymous on Jul 07, 2012 Comments:
418.	Name: Russ Greenlaw on Jul 07, 2012 Comments: MTC and ABAG, as unelected, unaccountable agencies have no business making policy or jamming any policy down the throats of the public. Only elected bodies have that authority. MTC and ABAG, as promoters of "One Bay Area" are acting as tyrants.
419.	Name: Pauline Zazulak on Jul 07, 2012 Comments:
420.	Name: Patricia Keylon on Jul 07, 2012 Comments:
421.	Name: Antoinette Reiser on Jul 07, 2012 Comments:
422.	Name: Michael McDermott on Jul 07, 2012

	Comments: The draft EIR fails to address many critical issues, including highly questionable assumptions about population and economic growth.
423.	Name: Anonymous on Jul 07, 2012 Comments:
424.	Name: Beverly Hansen on Jul 07, 2012 Comments:
425.	Name: Doris Robinson on Jul 07, 2012 Comments: If I could sign this petition more than once I would sign it a million times. We the People need more time to show you the folly of this plan and for our voice to be heard.
426.	Name: Vernon Dale on Jul 07, 2012 Comments: I want a full EIR preparation and review cycle.
427.	Name: Jeffrey Hunter on Jul 07, 2012 Comments: Why don't you One World government busybodies move to Havana or Kabul?
428.	Name: Raymond Wiggerwiggerr@sbcglobal.net on Jul 07, 2012 Comments:
429.	Name: Anonymous on Jul 07, 2012 Comments: STOP AGENDA 21!!!!!! PERIOD!!!
430.	Name: Susan Mister on Jul 07, 2012 Comments:
431.	Name: William McGee on Jul 07, 2012 Comments:
432.	Name: Anonymous on Jul 07, 2012 Comments:
433.	Name: Larry Nelson on Jul 07, 2012 Comments:
434.	Name: Donna Rosemont on Jul 07, 2012 Comments: Please, please stop Plan Bat Area!!! Stop this power grab and intrusion into our lives!!
435.	Name: Debbie Gomez-Davis on Jul 07, 2012 Comments:
436.	Name: Gaylon Kastner on Jul 07, 2012 Comments: I am fighting against Agenda and have been for many yearsOrlean Koehle, was the first person that brought this to my attention
437.	Name: Paula H Kotzen on Jul 07, 2012 Comments:
438.	Name: Jerry Nunes on Jul 07, 2012 Comments: We therefore call upon ABAG and MTC to reject the draft EIR as incomplete and inadequate and to extend the time for public comment on the next draft. The issues involved are critically important and decisions must not be made in haste without adequate time for review. The review process must allow maximum latitude for citizens to voice their views on the Plan and to demand complete examination of the most likely outcomes from its adoption.

439.	Name: Ashtynne Montgomery on Jul 07, 2012 Comments:
440.	Name: David Miller on Jul 07, 2012 Comments: One Bay Area Plan is flawed and must be scrapped. Leave control with the local governments.
441.	Name: Danny Calvert on Jul 07, 2012 Comments:
442.	Name: Anonymous on Jul 07, 2012 Comments:
443.	Name: Chris Calvert on Jul 07, 2012 Comments:
444.	Name: Joan Cook on Jul 07, 2012 Comments:
445.	Name: Marty Trout on Jul 07, 2012 Comments: Agenda 21 is the tool that communists are using to destroy America. The UN is controlled by Islamic and communist nations that hate America and Israel. Why do we pay 24% of their budget to destroy us?
446.	Name: Tracy Vogel on Jul 07, 2012 Comments: Local Gov. does not have the right to pass legislation that denies citizens rights and the right to be informed.
	Thank you! Tracy
447.	Name: William John Keast on Jul 07, 2012 Comments: Decisions such as land use must be made by elected officials, as they are directly held accountable by the electorate. This is still a republic and we cannot afford to hand over this type of decision-making power to bureaucrats with an agenda which may not be supported by a majority of the electorate.
	My right to own my own home, where I chose and where I can afford is still a sacred right under the Constitution of the United States of America. I do not wish to be told where or how I will live, especially by a group of unelected elitists who believe they know better than I do what is best for me.
448.	Name: Rose Haliewicz on Jul 07, 2012 Comments:
449.	Name: Susan B. Anthony on Jul 07, 2012 Comments: The citizens of Vallejo are being penalized by an aggressive citation regime, painting the curb red at the 'pick-up an extra person' in the commuter zone. I myself have received seven tickets in front of my home in the last year, all appealed by certified mail to no avail. The Vallejo Police ticket agency rarely acknowledges appeals and routinely doubles fines during the appeal process. Basicly I was blackmailed into paying \$200.for all the tickets to be dropped. What about the \$50.00 a day storage fee when they impound a vehicle, if the vehicle gets sold at auction for less than the storage bill, the old owner can be billed for the remaining exorbitant storage fees. Towing Companies should be regulated by the Public Utility Commission or the State Department for 'consumer protection.'
450.	Name: Mary Untiedt on Jul 07, 2012 Comments:
451.	Name: JANE BENSON-KEAST on Jul 07, 2012 Comments: This kind of hostage-taking must stop! NO- you CANNOT have my home, my liberty - OR - anything else!
452.	Name: JANE BENSON-KEAST on Jul 07, 2012 Comments: This kind of hostage-taking must stop! NO- you CANNOT have my home, my liberty - OR - anything else!
453.	Name: Jay Harvey on Jul 07, 2012 Comments:

454.	Name: Avon M. Wilson on Jul 07, 2012 Comments: The public has the right and MTC/ABAG have the responsibility to assure there is adequate time for a thorough EIR on the BAY AREA PLAN. Please extend the scoping time!
455.	Name: Anonymous on Jul 07, 2012 Comments: This plan needs to be made widely public, since it affects us dearly. Extend deadline to months more and publicize!
456.	Name: Selena Santa Cruz on Jul 07, 2012 Comments:
457.	Name: Sharron D. Nuno on Jul 07, 2012 Comments: I support efforts to ensure full and complete review and comment by citizens of the Bay Area.
458.	Name: Suzanne Rodriguez on Jul 07, 2012 Comments: Allow the public to vote on this.
459.	Name: Lois Kleinkauf on Jul 07, 2012 Comments:
460.	Name: Lois Kleinkauf on Jul 07, 2012 Comments:
461.	Name: Marilyn Britton on Jul 07, 2012 Comments: More review is needed before any of this plan is implemented.
462.	Name: Richard Codiga on Jul 08, 2012 Comments:
463.	Name: Evelyn Nokelby on Jul 08, 2012 Comments: We do not want this at all. Local people should be able to decide how they want their own towns/cities set up. Most of all I want the Constitution followed to the max and that means personal property rights protected!
464.	Name: Karen Ortega on Jul 08, 2012 Comments: Just another example of how dangerously easy it is to loose our individual rights and liberty. We will be vigilant.
465.	Name: Anonymous on Jul 08, 2012 Comments:
466.	Name: Bonnie Krupp on Jul 08, 2012 Comments:
467.	Name: J.Eckroat on Jul 08, 2012 Comments:
468.	Name: Lynnette Davis on Jul 08, 2012 Comments:
469.	Name: Anonymous on Jul 08, 2012 Comments:
470.	Name: Tracey Barber on Jul 08, 2012 Comments:

471.	Name: John Gorden on Jul 08, 2012 Comments:
472.	Name: John Gorden on Jul 08, 2012 Comments:
473.	Name: Rex Evatt on Jul 08, 2012 Comments:
474.	Name: Anonymous on Jul 08, 2012 Comments:
475.	Name: Daniel Smith on Jul 08, 2012 Comments: Thankyou Frank Leo keep up the good work
476.	Name: Anonymous on Jul 08, 2012 Comments:
477.	Name: Anonymous on Jul 08, 2012 Comments:
478.	Name: Anonymous on Jul 08, 2012 Comments:
479.	Name: Steve Kemp on Jul 08, 2012 Comments: Stop this Green Monster. It's nothing more than a power grab by the puppeteers.
480.	Name: Jaxon Riley on Jul 08, 2012 Comments:
481.	Name: Evelyn Cozakos on Jul 08, 2012 Comments:
482.	Name: Joseph Parrish on Jul 08, 2012 Comments:
483.	Name: Pamela Johnston on Jul 08, 2012 Comments: We have to stop One Bay Area now!
484.	Name: Nancy Mulligan on Jul 08, 2012 Comments:
485.	Name: Charles Weidner on Jul 08, 2012 Comments:
486.	Name: Anonymous on Jul 08, 2012 Comments:
487.	Name: Anonymous on Jul 08, 2012 Comments: Private Property Rights Must be Preserved
488.	Name: Joan G. Caviness on Jul 08, 2012 Comments: Give the many people affected a voice. Don't ram your opinions through, before you have heard ours, the taxpayers!
489.	Name: Elaine O'Neill on Jul 09, 2012

Page 31 of 54

### Comments:

490.	Name: Randy Roldan on Jul 09, 2012 Comments: I want FREEDOM !!!
491.	Name: Cheryl on Jul 09, 2012 Comments:
492.	Name: Michael Nielsen on Jul 09, 2012 Comments: Mimi~ we have met and I have been trying to cfome help at the meetings along the lines you trained me last December up in Napa. Keep up the great work!
493.	Name: Phillip Nishkian on Jul 09, 2012 Comments:
494.	Name: Margot Reynolds on Jul 09, 2012 Comments:
495.	Name: Ortrud Witt on Jul 09, 2012 Comments:
496.	Name: Anonymous on Jul 09, 2012 Comments: I fully agree with the precepts of the petition. Thank you for the good work and strong effort.
497.	Name: Harrison L Stockton on Jul 09, 2012 Comments:
498.	Name: John Fry on Jul 09, 2012 Comments:
499.	Name: Beverly Hansen on Jul 09, 2012 Comments:
500.	Name: Art Muir on Jul 09, 2012 Comments: This plan is an agenda being rushed through way too quickly,against the people's wishes, with a purposeful effort to make it difficult for the voice of the people to be heard. Our government becomes increasingly tyrannical, efforts like this Plan must be resisted.
501.	Name: Anonymous on Jul 09, 2012 Comments:
502.	Name: Norman C. Miller on Jul 09, 2012 Comments: I can't wait to express my opinion about government steam rolling over my rights.
503.	Name: Cynthia A. Corselli on Jul 09, 2012 Comments:
504.	Name: Chris Stanley on Jul 09, 2012 Comments: Stop this fraud! We want "One FREE Bay Area"!
505.	Name: David Oliver on Jul 09, 2012 Comments: It is not right to "Fast Track" anything of this importance. Give the people the right to respond.
506.	Name: Anonymous on Jul 09, 2012 Comments:

507.	Name: Peter Fanucchi on Jul 09, 2012 Comments: If this is a good idea for Californians then the process should be highly public for everyone to see in prime time!
508.	Name: Ronald Turner on Jul 09, 2012 Comments:
509.	Name: Donna Morris on Jul 09, 2012 Comments: The ERI scoping process is incomplete & amp; inadequate, so I request that you extend the time for public comment on the next daft.
510.	Name: Margi Kangas on Jul 09, 2012 Comments:
511.	Name: Sally Bettencourt on Jul 09, 2012 Comments: It is time to stop the advancemnet of the loss of liberty and a "taking" of our lands. This process is unamerican and non-elected persons are forcing decisions onto the citizens. This must stop and our truly elected officials in each locality needs to stand up and rebel against this movement. If they don't, they need to be removed from office.
512.	Name: Bob Diehl on Jul 09, 2012 Comments: Go get 'em
513.	Name: Sharlene Bami on Jul 09, 2012 Comments: Go get 'em
514.	Name: Bruce Phillips on Jul 09, 2012 Comments: More time 'must' be available to review this comprehensive Bay Area Plan.
515.	Name: Vickie Lessi on Jul 09, 2012 Comments: What a travesty, and the suffocation of public comment is Marxist! Whenever unelected officials, agencies, politicians do the hide and rush tactic, it's is ALWAYS negative for the people. What have you got to hide?!
516.	Name: Mary Walker on Jul 09, 2012 Comments: I strongly object and resent the underhanded, sneaky, tyrannical transfer of power from elected officials to unelected regional bodies without the knowledge and voice of WE the people who will be affected by these massive takeover of our lives!!
517.	Name: Scott Robinson on Jul 09, 2012 Comments:
518.	Name: Frank Miranda on Jul 09, 2012 Comments:
519.	Name: Harold Mackenzie on Jul 09, 2012 Comments:
520.	Name: Anonymous on Jul 09, 2012 Comments:
521.	Name: Jeanette Tomblin on Jul 09, 2012 Comments: I want to sign petition. Stop Agenda 21 , Plan Bay Area etal
522.	Name: Jeanette Tomblin on Jul 09, 2012 Comments: I want to sign petition. Stop Agenda 21 , Plan Bay Area etal
523.	Name: Ellyn Loesch on Jul 09, 2012 Comments:

524.	Name: Jeanette Tomblin on Jul 09, 2012 Comments: I want to sign petition. Stop Agenda 21 , Plan Bay Area etal
525.	Name: Bob Loesch on Jul 09, 2012 Comments:
526.	Name: Winston JJones Jr. on Jul 09, 2012 Comments:
527.	Name: Jeanette Tomblin on Jul 09, 2012 Comments: I want to sign petition. Stop Agenda 21 , Plan Bay Area etal
528.	Name: Joe Tomblin on Jul 09, 2012 Comments: Joe Tomblin signs petition
529.	Name: Joe Tomblin on Jul 09, 2012 Comments: Joe Tomblin signs petition
530.	Name: Keith Riordan on Jul 09, 2012 Comments:
531.	Name: Jami Mitchell on Jul 09, 2012 Comments:
532.	Name: Helen Magneson on Jul 09, 2012 Comments:
533.	Name: Edward Lenz on Jul 09, 2012 Comments: Government should not tell me what kind of transportation I should take or drive.
534.	Name: JOHN HAAS on Jul 09, 2012 Comments:
535.	Name: DOROTHY HAAS on Jul 09, 2012 Comments:
536.	Name: Cynthia Riordan on Jul 09, 2012 Comments:
537.	Name: Brad Seifers on Jul 09, 2012 Comments:
538.	Name: Anonymous on Jul 09, 2012 Comments: The committee must know their tactics are unpopular with the public and common sense must prevail
539.	Name: Paul And Trudy Schmitt on Jul 09, 2012 Comments:
540.	Name: Anonymous on Jul 09, 2012 Comments:

541.	Name: Jeanine Hillebrandt on Jul 09, 2012 Comments:
542.	Name: Anonymous on Jul 09, 2012 Comments:
543.	Name: Anonymous on Jul 09, 2012 Comments:
544.	Name: Anonymous on Jul 09, 2012 Comments:
545.	Name: Margot Boteler on Jul 09, 2012 Comments:
546.	Name: Diane Prioleau on Jul 09, 2012 Comments:
547.	Name: Cindy Haas on Jul 09, 2012 Comments:
548.	Name: Jennifer M Cooper on Jul 09, 2012 Comments:
549.	Name: Anonymous on Jul 09, 2012 Comments:
550.	Name: Anonymous on Jul 09, 2012 Comments:
551.	Name: Mary Walker on Jul 09, 2012 Comments: thought had already signedand expressed my concerns at the underhanded deceitful manner in which our lives are being taken over by unelected people controllers pushing UN mandates without our input or vote!
552.	Name: Margaret A Eash on Jul 09, 2012 Comments: thank you for keeping us informed.
553.	Name: John G. Reynolds on Jul 09, 2012 Comments:
554.	Name: Robert And Dawn Horton on Jul 09, 2012 Comments: Do not regulate us out of our freedom to live as we chose. This will leave fewer choices of lifestyles putting the population in little boxes made of ticky-tacky. These boards are not even elected ,so where does the power come from. We should start a petition to have a proposition placed on the ballot to disband all these unelected regulatory boards.
555.	Name: Wickie Smith on Jul 09, 2012 Comments:
556.	Name: Anonymous on Jul 09, 2012 Comments:
557.	Name: Anonymous on Jul 09, 2012 Comments:
558.	Name: Joy Schoming on Jul 09, 2012 Comments:

559.	Name: Mary Ann Brautigan on Jul 09, 2012 Comments:
560.	Name: Anonymous on Jul 09, 2012 Comments:
561.	Name: Kathy Cravines on Jul 09, 2012 Comments:
562.	Name: Joanne Hottendorf on Jul 09, 2012 Comments: This is a mostly covert operation that citizens don't know about. Given the right to vote on "The Facts" of this plan, NO ONE WOULD VOTE FOR IT.
563.	Name: Joe Hernandez on Jul 09, 2012 Comments:
564.	Name: Rainey Olson on Jul 09, 2012 Comments: will u be speaking anywhere in the Santa Rosa area in the near future?
565.	Name: Gary Smukal on Jul 09, 2012 Comments:
566.	Name: Susan Albrecht on Jul 09, 2012 Comments:
567.	Name: Michael L. Martin on Jul 09, 2012 Comments:
568.	Name: Anonymous on Jul 09, 2012 Comments:
569.	Name: Anonymous on Jul 09, 2012 Comments:
570.	Name: Anonymous on Jul 09, 2012 Comments:
571.	Name: Mark Behrens on Jul 09, 2012 Comments: Property rights and personal freedoms were among the most crucial, fundamental principles upon which the United States was founded. I am not a property owner, yet I can see that Plan Bay Area is another step in the continued erosion of our liberties. It is not leadership or wise planning, but rather another example of a slow but sure slide into tyranny.
572.	Name: Michael Wilson on Jul 09, 2012 Comments:
573.	Name: Coley McBride on Jul 09, 2012 Comments: One Bay Area is an attack on private property and must be stopped. It is another discouraging example of the US government no longer understanding it's original tenance of being for the people. n
574.	Name: Susan Piedmont on Jul 09, 2012 Comments:
575.	Name: Bruce T Cowee on Jul 09, 2012 Comments:

576.	Name: SALVATORE GRAMMATICO on Jul 09, 2012 Comments: RETAINING LOCAL MANAGEMENT OF THE DEVELOPMENT OF OUR COMMUNITY IS PARAMOUNT IN OUR FORM OF GOVERNANCE
577.	Name: Anonymous on Jul 09, 2012 Comments:
578.	Name: Terry Steffen on Jul 09, 2012 Comments: I am against Plan Bay Area
579.	Name: Anonymous on Jul 09, 2012 Comments:
580.	Name: Nancy Martino on Jul 09, 2012 Comments:
581.	Name: Charla Benner on Jul 09, 2012 Comments: THIS MUST BE DEFEATED!
582.	Name: Anonymous on Jul 09, 2012 Comments: Stop the madness!
583.	Name: Anonymous on Jul 09, 2012 Comments:
584.	Name: Nathan McMahon on Jul 09, 2012 Comments: I totally reject this unconstitutional effort on the part of ABAG and MTC to nullify the right of every individual to be properly represented by constitutionally elected officials and to deny citizens the right to protest the actions of ABAG and MTC in this fraudulent, inadequate, incomplete, and totally transparent process designed to steal the freedoms and property rights of California residents and United States Citizens without any recourse to oppose it. Nathan McMahon, 16856 Armstrong Woods Road, Guerneville CA, 95446.
585.	Name: Ingrid Simkins on Jul 09, 2012 Comments:
586.	Name: Anonymous on Jul 09, 2012 Comments:
587.	Name: KENNETH R. COOK on Jul 09, 2012 Comments: your agenda is not my agenda,we do not think that people should be stacked on top of each other like cabreney greens in Chicago
588.	Name: Kimberley Ledwell on Jul 09, 2012 Comments:
589.	Name: Thomas F Turner on Jul 09, 2012 Comments: Stop trying to control my life. Fix the broken state
590.	Name: Anonymous on Jul 09, 2012 Comments:
591.	Name: Amy Chorney on Jul 09, 2012 Comments:
592.	Name: Jason Chorney on Jul 09, 2012 Comments:

593.	Name: Corrine Martin on Jul 09, 2012 Comments:
594.	Name: Casey Nesbit on Jul 09, 2012 Comments: The EIR is based on Flawed premes of agenda 21. You should not let the UN dictate how this state is run.
595.	Name: Lorraine Humes on Jul 09, 2012 Comrnents: I think my city council, San Pablo, is into getting money from the ABAG and will go along with sustainable development. What can I do?
596.	Name: Robin Berwick on Jul 09, 2012 Comments:
597.	Name: BOB on Jul 09, 2012 Comments:
598.	Name: Glenda Kitchel on Jul 09, 2012 Comments: Stop Agenda 21 we do want it!
599.	Name: Anonymous on Jul 09, 2012 Comments:
600.	Name: Jan Soule on Jul 09, 2012 Comments:
601.	Name: G R Smith on Jul 09, 2012 Comments:
602.	Name: Margie Liberty on Jul 09, 2012 Comments:
603.	Name: Hal Mortimer on Jul 09, 2012 Comments:
604.	Name: Jesus Padilla on Jul 09, 2012 Comments:
605.	Name: Antonio on Jul 09, 2012 Comments:
606.	Name: Nancy Lee Liebscher on Jul 09, 2012 Comments: Why are our rights of no importance? Why are we subservient to false studies like global warming and sustainable development? Why? Why?
607.	Name: Robert Hauser on Jul 09, 2012 Comments: If there is one thing guaranteed to bring my blood to the boiling pointit is grossly oversalaried and unelected bureaucrat sleaze who, because they are academically pedigreed by some lvy Plague egg farm or so called "liberal" diploma mill like UC Berserkeley or UCLA, fancy themselves qualified to dictate to us how to live our lives and what is best for the communities we've lived in for decades in many cases and that they have never even set foot in. This country reeks from here to the far end of Hell with self-bloating alphabet soup bureaucracies and this status needs to be dismantled with extreme prejudice in the name of what shambles and wreckage of Constitutional justice yet remains in our livesand ABAG/MTC are a superb place to begin ridding ourselves of parasites.
608.	Name: Christine Certo on Jul 09, 2012

Name: Christine Certo on Jul 09, 2012 Comments: How does that quote go? "The only thing necessary for the triumph of evil is for good men to do nothing." 609. Name: Glenn Steiding on Jul 09, 2012 Comments: Stop meddling in social engineering... Man has been trying to alter our conditions since he started talking... look where that has gotten us. You'll never achieve your goal.. there are forces working against you that make it impossible... the indiscretions of mankind itself ... all the evil traits. 610. Name: David Ericksob on Jul 09, 2012 Comments: Name: Louise Crawford on Jul 09, 2012 611. Comments: hope I did this right 612. Name: Lee Ann Reuter on Jul 09, 2012 Comments: 613. Name: Vera Sorum on Jul 09, 2012 Comments: 614. Name: Gary Scheier on Jul 09, 2012 Comments: 615. Name: Gene Enfantino on Jul 09, 2012 Comments: 616. Name: Jeanette Mitchell on Jul 09, 2012 Comments: 617. Name: Olivia Vicente on Jul 09, 2012 Comments: 618. Name: Jack B. Ritter on Jul 09, 2012 Comments: It's far past time to slow or shut down run away government agencies with no accountability and rampant unintended consequences. 619. Name: Bryan Draper on Jul 09, 2012 Comments: 620. Name: Susan Bernard on Jul 09, 2012 Comments: 621. Name: Anonymous on Jul 09, 2012 Comments: 622. Name: Tashia M. Flucas on Jul 09, 2012 Comments: 623. Name: Lynn Teger on Jul 09, 2012 Comments: 624. Name: Clarence De Barrows on Jul 09, 2012 Comments: Comprehensive plans take precedence over and are, more often than not, insensitive to local concerns. Local governments concerns should take precedence over comprehensive planners authority grabs. You know, it's like the authority assigned to the States over the Federal government as defined in the Constitution. 625. Name: Clarence De Barrows on Jul 09, 2012 Comments:

626.	Name: Elizabeth Manning on Jul 09, 2012 Comments: ABAG and MTC have commissioned an environmental impact report (EIR) on Plan Bay Area that is incomplete. Please help us maintain our liberty by becomming informed.
627.	Name: Cecily Barber on Jul 09, 2012 Comments: The people NEED to KNOW what all this plan entails, not just the feel-good slogans. This plan is setting up EXTRA GOVERNMENT LAYERS which will adopt guidelines without electable accountability!!
628.	Name: Joan Leone on Jul 09, 2012 Comments: STOP THIS LAND GRAB IMMEDIATELY
629.	Name: Elena Stahn on Jul 09, 2012 Comments:
630.	Name: Jesse Lindsey on Jul 09, 2012 Comments: Stop crony capitalist/fascist Agenda 21 in the Bay area along with the rest of the country!
631.	Name: Becky Kolberg on Jul 09, 2012 Comments:
632.	Name: John Novick on Jul 10, 2012 Comments:
633.	Name: Carol Gibson on Jul 10, 2012 Comments: I don't like the way the government has been reducing my say on the way I live by first ignoring me, and then just transferring the power to others who are NOT elected individuals!
634.	Name: Barbara Wanvig on Jul 10, 2012 Comments: I oppose Plan Bay Area for the reasons outlined in this petition.
635.	Name: Janet Feeley on Jul 10, 2012 Comments: In a free society you must have private property rights!!
636.	Name: Donald Cole on Jul 10, 2012 Comments: The proposed bill has been moved thorugh too quickly and needs more citizen imput.
637.	Name: Allen C Woolsey on Jul 10, 2012 Comments: I do not approve of the Plan Bay Area. As a resident, property owner and tax payer I oppose the transfering of development from our elected county planning officials to an unelected group of regional bodies.
638.	Name: Karen Westover on Jul 10, 2012 Comments:
639.	Name: Anonymous on Jul 10, 2012 Comments:
640.	Name: Anonymous on Jul 10, 2012 Comments:
641.	Name: Joe Mahoney on Jul 10, 2012 Comments:
642.	Name: Margaret Mahoney on Jul 10, 2012 Comments:
643.	Name: Doug Silveira on Jul 10, 2012

Page 40 of 54

#### Comments:

644.	Name: Olga Pellegrini on Jul 10, 2012 Comments: I am totally against PlanBayArea. This plan is not Constitutional and absolutely by passes the rights of the individual and property rights! I want to have a choice as to where I live and don't want to be mandated by unelected officials/.
645.	Name: Terry Gossett on Jul 10, 2012 Comments:
646.	Name: Jeanne Decker on Jul 10, 2012 Comments:
647.	Name: Anonymous on Jul 10, 2012 Comments:
648.	Name: Pamela McCart on Jul 10, 2012 Comments:
649.	Name: Anonymous on Jul 10, 2012 Comments:
650.	Name: Johnette Pfingstenten on Jul 10, 2012 Comments: enough already with the continuous erosion of our freedoms
651.	Name: Judy Fawcett on Jul 10, 2012 Comments: this is so wrong, people do not know what is happening. we are all too busy trying to keep above water.
652.	Name: Paul Cardaropoli on Jul 10, 2012 Comments: How much more are we going to let them take from us, before we act?
653.	Name: Neil Mammen on Jul 10, 2012 Comments:
654.	Name: Jennifer Fisher on Jul 10, 2012 Comments:
655.	Name: Anonymous on Jul 10, 2012 Comments:
656.	Name: Anonymous on Jul 10, 2012 Comments:
657.	Name: Anonymous on Jul 10, 2012 Comments: America, land of the free. Leave it that way.
658.	Name: Mark Jeghers on Jul 10, 2012 Comments: DO NOT SPAM ME. No emails of ANY kind.
659.	Name: Anonymous on Jul 10, 2012 Comments:
660.	Name: Susan Hart on Jul 10, 2012 Comments:
661.	Name: Lois Dogey on Jul 10, 2012

### Comments:

662.	Name: Scott Saftler on Jul 10, 2012 Comments:
663.	Name: Guillermo Ferreti on Jul 10, 2012 Comments: Dont want to live in a high density location. I want freedom
664.	Name: Dave Bartle on Jul 10, 2012 Comments:
665.	Name: Nicholas Brown on Jul 10, 2012 Comments:
666.	Name: Anonymous on Jul 10, 2012 Comments:
667.	Name: De Martini, Steven on Jul 10, 2012 Comments: Human behavior modification through regulation is short term, long term it will cause rebellion/revolt. Education and freedom is the only best path to take.
668.	Name: Willard Solymanbeyk on Jul 10, 2012 Comments:
669.	Name: Lynn Hofland on Jul 10, 2012 Comments:
670.	Name: Judith Buffington on Jul 10, 2012 Comments:
671.	Name: Lynn Hofland on Jul 10, 2012 Comments:
672.	Name: Cathleen Storm on Jul 10, 2012 Comments: I am completely against this awful plan. It is a terrible threat to the freedom of our way of life.
673.	Name: Diane Lynn Johnson on Jul 10, 2012 Comments:
674.	Name: Gary Kinsman on Jul 10, 2012 Comments: Pleasanton, CA
675.	Name: Lynda Kinsman on Jul 10, 2012 Comments: Pleasanton, CA
676.	Name: Phyllis Worth on Jul 10, 2012 Comments:
677.	Name: Jim Carr on Jul 10, 2012 Comments: This project has such huge ramifications to the citizens of California. The local meeting was not publicized properly, a "leader" speaking on behalf fo the program said it did not have to be properly noticed In all my years in the public sector, any project impacting the well being of the community, by law, must be properly noticed with meetings held at convenient times for the public.

678. Name: Michael Shadwick on Jul 10, 2012 Comments: Please do not rush through this EIR without a PROPER time period for public comment. I personally do not wish to live in a high density " transit" zone. I have a bicycle which i ride regularly. I have no desire to be told when I should and shouldn't be able to ride it. The same would be true with my pickup truck. I do not wish to have my personal sovereignty impinged by someone else's idea of how i should live my life. As a business owner, i am already deluged with regulations and restrictions, thus curtailing my ability to hire more employees and expand my business. Don't make it any tougher.

679. Name: David Eugene Way on Jul 10, 2012 Comments: NOT for the plan.DO NOT transfer the power to UNELECTED officials. do not bypass EIR!!! 680. Name: Alice McKeon on Jul 10, 2012 Comments: Thank you for the petition. We must stop the destruction of our liberties. 681. Name: Anonymous on Jul 10, 2012 Comments: 682. Name: Annie Simpson on Jul 10, 2012 Comments: I am very much against the fast tracking of Plan Bay Area as presently being aggressively fast forwarded. This proposal needs to be throughly understood by the citizens and how it will affect themselves personally and as families. 683. Name: Herb Drake on Jul 10, 2012 Comments: 684. Name: Henry E. Lawrence on Jul 10, 2012 Comments: ABAG is the local version of Agenda 21 685. Name: Larry Ray on Jul 10, 2012 Comments: we need to stop this !!!! 686. Name: Charles T Dunkle on Jul 10, 2012 Comments: 687. Name: Emily Sabatka on Jul 10, 2012 Comments: Keep liberty alive! 688. Name: Nancy Barlas on Jul 10, 2012 Comments: enough with this socialist mentality. this is americas and we can live and drive where and when we wish .......if you truly believe CO2 is a poisionous, dangerous gas.....please save the world and hold your breath! 689. Name: Richard Warsinger on Jul 10, 2012 Comments: 690. Name: Ken Whelan on Jul 10, 2012 Comments: keep government off our backs. Ken 691. Name: Miles Conway on Jul 10, 2012 Comments: 692. Name: Donald Guerrero on Jul 10, 2012 Comments: 693 Name: Tracy Selge on Jul 10, 2012 Comments: I do not recall the last time I attended a City Council meeting (yes, I sometimes attend) that a private company had the option to " fast track" a project. It is time that the gov. follows the same rules and processes it has is imposed on everyone else. "Community" is constantly being touted, yet when the community shows up, wanting to get involved and have apart in the process, they are shut out. I call on ABAG anb MTC to extend the time for public comment. In doing so, they will show that they value the processes they have put in place, but more importantly support the idea of " We the People".

694. Name: Robert Klingner on Jul 10, 2012

Comments: I call upon ABAG and MTC to reject the EIR scoping process as incomplete and inadequate . I call upon ABAG and MTC to extend the time for public comment on the next draft.

695.	Name: Anonymous on Jul 10, 2012 Comments: SF
696.	Name: Robert Klingner on Jul 10, 2012 Comments: I call upon ABAG and MTC to reject the EIR scoping process as incomplete and inadequate. I call upon ABAG and MTC to extend the time for public comment on the next draft.
697.	Name: Cynthia M Plencner on Jul 10, 2012 Comments:
698.	Name: Jean Abadie on Jul 10, 2012 Comments: Property rights need to be expanded and government regulations and controls need to be significantly restricted.
699.	Name: Mike Purtell on Jul 10, 2012 Comments:
700.	Name: Michael Crivello on Jul 10, 2012 Comments:
701.	Name: Hallie Bigliardi on Jul 10, 2012 Comments:
702.	Name: Robert Schooley on Jul 10, 2012 Comments:
703.	Name: Edward F. Johnson on Jul 10, 2012 Comments:
704.	Name: Susan Knoll on Jul 10, 2012 Comments: STAY OUT OF OUR LIVES!
705.	Name: James Modrall on Jul 10, 2012 Comments:
706.	Name: Anonymous on Jul 10, 2012 Comments:
707.	Name: Anonymous on Jul 10, 2012 Comments:
708.	Name: Arthur R. Perez on Jul 10, 2012 Comments:
709.	Name: Larry M. Kitchel on Jul 10, 2012 Comments: "Freedom"
710.	Name: John Marino on Jul 10, 2012 Comments: I regret that our elected officials are trying to pass legislation that is contrary to what many would expect and only find out after laws are passed. I hope this is struct down.
711.	Name: Elizabeth McCarthy on Jul 10, 2012

711. Name: Elizabeth McCarthy on Jul 10, 2012 Comments: Let us remember the men and women who over the years have sacrificed their lives so that we could live in the freedom of the Constitution..life, liberty and the pursuit of happiness. We are not to be governed by unelected bodies..this is a form of tyranny.

712.	Name: Chris Decker on Jul 10, 2012 Comments: Leave me to make my own choices. I do not need or want the government to make them for me
713.	Name: Sharon Muzio on Jul 10, 2012 Comments:
714.	Name: Doug Pratt on Jul 10, 2012 Comments:
715.	Name: Doug Pratt on Jul 10, 2012 Comments:
716.	Name: LINDA SANTI on Jul 10, 2012 Comments: These eco-terrorists will never get away with any of this. We will fight.
717.	Name: Anonymous on Jul 10, 2012 Comments: I want LIBERTY, not ECO-TYRANNY. I do not want ANY restrictions on my personal lifestyle choices, including where I live, how I travel, and my cost of living. Your Plan transfers authority for the most critical public policy issues – land use, transportation, and housing – from elected local officials to unelected bureaucrats. It will also impose billions of dollars of unfunded expenses on local communities that are already facing huge budget deficits.
	Start listening to the citizens and stop your socialistic behaviors!
718.	Name: Sandy And Fred Mangold on Jul 10, 2012 Comments: For years I have heard these community destroying ideas floated by arrogant politicians who would not be impacted by the havoc their misguided ideas would create. Using imagined global warming as cover they propose to radically alter the way most freedom loving people want to live. A proposed low income project in my city stirred anger in the hearts of mostly apathetic citizens and nearly caused a riot. That is what you face when folks wake up to the nightmare your plan would create. Sandy Mangold Millbrae Ca
719.	Name: Anonymous on Jul 10, 2012 Comments:
720.	Name: Anonymous on Jul 10, 2012 Comments:
721.	Name: Ray Calvello on Jul 10, 2012 Comments:
722.	Name: Rosanna Valentini on Jul 10, 2012 Comments: I reject the plan EIR that ABAG and MTC have adopted
723.	Name: Brandon Pace on Jul 10, 2012 Comments: Stop the bureaucratic takeover of our freedom!
724.	Name: Andrea Casino on Jul 10, 2012 Comments: Thank you for this petition. I just now heard about it and will get the word out on my facebook.
725.	Name: Ciark Darrah on Jul 10, 2012 Comments: I am fifth generation Californian, and also come from a military family. The battle for freedom has come to us, because the people we continually put in office to protect our constitutional rights betray us for there selfish greed. But now it's worse, our " leaders" have been tempted by liesof the Comunists and the dictatores of the United Nations. We must stand against this tyrany NOW!
726.	Name: Andrea Ramos on Jul 10, 2012 Comments:

Page 45 of 54

727.	Name: W. Patricia Clarke on Jul 10, 2012 Comments:
728.	Name: Brent Cook on Jul 10, 2012 Comments:
729.	Name: Charles D. Harding on Jul 10, 2012 Comments:
730.	Name: Rhena Hendricks on Jul 10, 2012 Comments:
731.	Name: Alan Wright on Jul 10, 2012 Comments:
732.	Name: Christopher Luemgo on Jul 10, 2012 Comments:
733.	Name: Anonymous on Jul 10, 2012 Comments: I think more access for regular people to give opinions on these sweeping plans is very important
734.	Name: Christopher Luengo on Jul 10, 2012 Comments:
735.	Name: Debbie Sly on Jul 10, 2012 Comments: We, the public are against the One Bay Area Plan stop this insanity now!
736.	Name: Clifford Luengo on Jul 10, 2012 Comments:
737.	Name: Joseph Blackwell on Jul 10, 2012 Comments:
738.	Name: Robert Foss on Jul 10, 2012 Comments: Stop trying to tell us how to live!
739.	Name: Larry Nemetz on Jul 10, 2012 Comments: Let freedom ring!
740.	Name: Thomas Hoog on Jul 10, 2012 Comments: More time is needed for comment!
741.	Name: Rick Luck on Jul 10, 2012 Comments:
742.	Name: Todd Davies on Jul 10, 2012 Comments:
743.	Name: Alan Anderson on Jul 10, 2012 Comments:
744.	Name: Kevin McClure on Jul 10, 2012 Comments: No changes in the peoples private property rights should be allowed without the peoples vote.

745.	Name: Julie Alexander on Jul 10, 2012 Comments:
746.	Name: Lisa Luengo on Jul 10, 2012 Comments:
747.	Name: Rose Bishop on Jul 10, 2012 Comments:
748.	Name: Thom Steinmetz on Jul 10, 2012 Comments:
749.	Name: Jean Kalvig on Jul 10, 2012 Comments: We are losing our freedoms a little at a time and this is just taking more of our rights to live in America as a free people.
750.	Name: Steven Traversari on Jul 10, 2012 Comments:
751.	Name: Margaret Murguia on Jul 10, 2012 Comments:
752.	Name: Patricia Jones on Jul 10, 2012 Comments:
753.	Name: Anonymous on Jul 10, 2012 Comments:
754.	Name: Lance Ruttledge on Jul 10, 2012 Comments:
755.	Name: David Boragno on Jul 10, 2012 Comments:
756.	Name: Susanne Wagner on Jul 10, 2012 Comments: PLEASE STOP THE SOCIALIZING AND THE U.N. TAKE-OVER OF A ONCE FREE AMERICA. THE USA MUST REMAIN A FREE COUNTRY - ONE BAY AREA IS NOT PROMOTING FREEDOM OR LIBERTY AND MUST STOP.
757.	Name: BILL SLY on Jul 10, 2012 Comments: We do not want the marxist One Bay Area plan.
758.	Name: James T. Gibbons on Jul 10, 2012 Comments:
759.	Name: James T. Gibbons on Jul 10, 2012 Comments:
760.	Name: Greg Walker on Jul 10, 2012 Comments:
761.	Name: Anonymous on Jul 10, 2012 Comments:
762.	Name: Ken Soult on Jul 10, 2012 Comments: Keep up the good work! Heard about this on KSFO

763.	Name: Anonymous on Jul 10, 2012 Comments:
764.	Name: ROBERT SEVERIN on Jul 10, 2012 Comments: This is totally unnecessary!
765.	Name: Alan McIntyre on Jul 10, 2012 Comments: everybody needs to know befor any vote takes place!!!
766.	Name: Anonymous on Jul 10, 2012 Comments:
767.	Name: Anonymous on Jul 10, 2012 Comments:
768.	Name: Nicole Lynn on Jul 10, 2012 Comments:
769.	Name: Raina Cordich on Jul 10, 2012 Comments:
770.	Name: Susan Bingham on Jul 10, 2012 Comments: The public has not been given facts, has not had time to comment, and has not been allowed to ask questions at the meetings that have been held. If this is so great, why is it being rushed ahead before the public knows what's happening?
771.	Name: Anonymous on Jul 10, 2012 Comments:
772.	Name: Anonymous on Jul 10, 2012 Comments: stop agenda 21 NOW.
773.	Name: Barry Flowers on Jul 10, 2012 Comments: Stop the government from crontolling our very existance, FREEDOM.
774.	Name: Anonymous on Jul 10, 2012 Comments:
775.	Name: Suzanne Viscovich on Jul 10, 2012 Comments:
776.	Name: Alex Arcady on Jul 10, 2012 Comments:
777.	Name: Anonymous on Jul 10, 2012 Comments:
778.	Name: Anonymous on Jul 10, 2012 Comments: More time is needed to effect the changes that are sought. The people who are affected need to be in the decision-making process. Issues that are given the "bum's-rush" cause more problems than they "solve." As a home owner in San Mateo and Hayward, I want more time to examine this proposed change.
	Sincerely, M. Beavins
779.	Name: Linda Hoffman on Jul 10, 2012 Comments: We want liberty not Ecotyranny!

780.	Name: Lauren Newington on Jul 10, 2012 Comments: Keep government out of our everyday lives!
781.	Name: Scott Gaynos on Jul 10, 2012 Comments:
782.	Name: Keith Adams on Jul 10, 2012 Comments:
783.	Name: Anonymous on Jul 10, 2012 Comments: Please reject the EIR scoping process for control of individual property rights. This process is incomplete and inadequate for the rights of all citizens.
784.	Name: Adrian DiLena on Jul 10, 2012 Comments:
785.	Name: Warren Gammeter on Jul 10, 2012 Comments: We don't want Agenda 21!
786.	Name: Richard Bessey on Jul 10, 2012 Comments:
787.	Name: Scott DuBridge on Jul 10, 2012 Comments:
788.	Name: Anonymous on Jul 10, 2012 Comments:
789.	Name: Margaret Stockton on Jul 10, 2012 Comments:
790.	Name: Daniel Gallen on Jul 10, 2012 Comments:
791.	Name: Anonymous on Jul 10, 2012 Comments: No more of the runaway marxist communist agenda being rammed through by sanctimonious liberal elitists.
792.	Name: ELEANOR MAGGIORA on Jul 10, 2012 Comments:
793.	Name: Robert Stockron on Jul 10, 2012 Comments:
794.	Name: Anonymous on Jul 10, 2012 Comments:
795.	Name: Aaron DeLaO on Jul 10, 2012 Comments: This should not happen without the consent of the people.
796.	Name: John Hertzer on Jul 10, 2012 Comments: stop thi s nonsense
797.	Name: Gregory Carstensen on Jul 10, 2012 Comments:

798.	Name: Jeanette Tomblin on Jul 10, 2012 Comments: sign petition to stop Agenda 21 etal
799.	Name: Larry Bogel on Jul 10, 2012 Comments:
800.	Name: Dolores Coester on Jul 10, 2012 Comments: This is just crazy.
801.	Name: David DiDonato on Jul 10, 2012 Comments: These people have gone too far. Wilderness Nation lives
802.	Name: Anonymous on Jul 10, 2012 Comments:
803.	Name: David DiDonato on Jul 10, 2012 Comments: These people have gone too far. Wilderness Nation lives
804.	Name: Moises Rivas on Jul 10, 2012 Comments:
805.	Name: Anonymous on Jul 10, 2012 Comments:
806.	Name: MARK MAIORANA on Jul 10, 2012 Comments: STOP AGENDA 21!
807.	Name: Jeremy Freeman on Jul 10, 2012 Comments: This is America, not communist Russia or China. Imposing laws that remove the rights of the people for "the greater good" is tyranny! Stop trying to take away our rights!
808.	Name: John Hyatt on Jul 10, 2012 Comments:
809.	Name: Christy Jacobs on Jul 10, 2012 Comments:
810.	Name: Jeffrey Polder on Jul 10, 2012 Comments: Bad Bad government.
811.	Name: Ken Mitchell on Jul 10, 2012 Comments: This leftist scheme has all the earmarks of a giant gulag. It'll be like living in some-third world slum. Forget it! Go out and find a useful job.
812.	Name: Robert Von Schwab on Jul 10, 2012 Comments: I belong to machinist district 190. I talk with my numerous brothers and they agree that this plan MUST be stopped.
813.	Name: PEG RUCKER on Jul 10, 2012 Comments: THIS IS A FREEDOM KILLER. STACKED HOUSING IS NOT WHAT WE NEED FOR THE FUTURE OF THIS COUNTRY.
814.	Name: Ed Manning on Jul 10, 2012 Comments: Agenda 21 is un-American!
815.	Name: Anonymous on Jul 10, 2012 Comments:

816.	Name: Michael J Piccardo on Jul 10, 2012 Comments: I don't want decisions about how I live made by unelected bureaucrats. All decisions on "One Bay Area" need to be approved by a vote of the people.
817.	Name: Charles Adams on Jul 10, 2012 Comments:
818.	Name: Ray And Maralyn Killorn on Jul 10, 2012 Comments:
819.	Name: Maralyn Angeline (Dover) Killom on Jul 10, 2012 Comments:
820.	Name: Stephen R. Golub on Jul 10, 2012 Comments:
821.	Name: John Roderick on Jul 10, 2012 Comments: I am against the power grab by elected local officials.
822.	Name: Jane Jackson on Jul 10, 2012 Comments: Outrageous
823.	Name: Anonymous on Jul 10, 2012 Comments: A loss of Constitutional freedom(s) is not America!
824.	Name: Dan Hartman on Jul 10, 2012 Comments:
825.	Name: Dawn Parent on Jul 10, 2012 Comments: Property rights & liberty are connected, they must be preserved against govt controls
826.	Name: Cesar Simon on Jul 10, 2012 Comments:
827.	Name: Celia J. Brown on Jul 10, 2012 Comments: Everyone I know is against this very offensive power grab. The citizens should vote on this! You are wrong to force it upon our peaceful communities.
828.	Name: Thomas Murchie on Jul 10, 2012 Comments: This is nothing short of open communism. The UN has never achieved a single intended goal, including goals that are purported to advance the human condition. It is nothing more than a collection of racist, communists, anarchists, bureaucrats, and worse. "Anyone" pushing their agenda is seriously uniformed and totally lacking the ability to think critically. God save us.
829.	Name: Mark L. Mitchell, Esq. on Jul 10, 2012 Comments:
830.	Name: Lori Jenkins on Jul 10, 2012 Comments: I can hardly recognize this state, I feel as if I've moved to the Soviet Union instead of the California. Our rights have been trampled, we need to change the people running this state to bring sanity back to our state.
831.	Name: Roark Barraclough on Jul 10, 2012 Comments:
832.	Name: Jon Wilson on Jul 10, 2012 Comments: Ten years and I participated in an early version of the ": Plan Bay Area": under the quise of a

Comments: Ten years ago I participated in an early version of the " Plan Bay Area" under the guise of a

" Transportation Hub." It was clear to me then, as now, that plans like this (1) restrict ownership of private property, (2) restrict the movement of goods, services and emergency services, (3) never consider how issues of power, sewer and water shall be impacted, and mostly in a negative way. Overall, such a plan can violate US Constitution, Article 1, Sec. 9 by restricting personal movement! This entire effort is backdoor and should be voted on!

- 833. Name: Kristin Konvolinka on Jul 10, 2012 Comments:
- 834. Name: Marilyn Koenig on Jul 10, 2012 Comments: Don't fence me in! No planned ghettos!

835. Name: Olga P Pellegrini on Jul 10, 2012 Comments: The PlanBayArea has not been put up to a vote by the citizens of the Bay area. It should be voted on by every county that you're trying to lump together in a region!

No only I find it unconstitutional, but also it hurts the environment and poor people you claim you are trying to help! by giving waivers to big developers and creating a high concentration of pollution in urban areas!

836.	Name: Dino Fry on Jul 10, 2012 Comments: lets stop those comunists
837.	Name: Allen Shriver on Jul 10, 2012 Comments:
838.	Name: Sharon Dashner on Jul 10, 2012 Comments:
839.	Name: Lloyd Dashner on Jul 10, 2012 Comments:
840.	Name: John Aitken on Jul 10, 2012 Comments:
841.	Name: Dale on Jul 10, 2012 Comments:
842.	Name: Elizabeth Biagini on Jul 10, 2012 Comments:
843.	Name: Theresa Carlomagno on Jul 10, 2012 Comments:
844.	Name: Connie Cipperly on Jul 10, 2012 Comments:
845.	Name: Tom Mercurio on Jul 10, 2012 Comments:
846.	Name: Dina Wilson on Jul 10, 2012 Comments:
847.	Name: Anonymous on Jul 10, 2012 Comments:

848. Name: Anonymous on Jul 10, 2012

Comments: The Bay Area cannot sustain anymore fees or taxes imposed by politicians and unelected bureaucrats. The Bay Area does not want to hand over their property rights or transform the way we live and travel.

849.	Name: E Robert Ronning on Jul 10, 2012 Comments: NO ONE BAY PLAN!!!!!
850.	Name: Bonnie Holt on Jul 10, 2012 Comments:
851.	Name: Sally Plaisted on Jul 10, 2012 Comments:
852.	Name: Julian Fraser on Jul 10, 2012 Comments: I do not want these Socialist telling me where I should live.
853.	Name: John Woodman on Jul 10, 2012 Comments:
854.	Name: Dale McKenna on Jul 10, 2012 Comments: Please leave us alone. We work hard to have the freedom to choose where we live, how we live and to enjoy the pride and ownership of private property. Please go work on your own garden.
855.	Name: Frank Wise on Jul 10, 2012 Comments:
856.	Name: Diana Nagy on Jul 10, 2012 Comments: NO to One Bay Area!!
857.	Name: Anonymous on Jul 10, 2012 Comments:
858.	Name: Al Merchant on Jul 10, 2012 Comments:
859.	Name: Anonymous on Jul 10, 2012 Comments:
860.	Name: Stephen Makin on Jul 10, 2012 Comments: I was never given the opportunity to vote for this social engineering crap, but I DO vote for elective office Put this on hold.
861.	Name: Sandra Robison on Jul 10, 2012 Comments:
862.	Name: Peter Moale on Jul 10, 2012 Comments: "Be afraid, be very very afraid", of these people who want to do this ! I will tell you this, it will NOT be in YOUR best interest !!!
863.	Name: Rod Gippetti on Jul 10, 2012 Comments:
864.	Name: Molly Morgan Clough on Jul 10, 2012 Comments: I don't think the general public understands how serious the effects of this groups ability to completely change our communities and adverse; I control our property rights.
865.	Name: Richard D Watts on Jul 10, 2012 Comments: Totally against this approach and the methods used by the MTC and ABAG!

866.	Name: Roderick Perez on Jul 10, 2012 Comments:
867.	Name: Ann Marie Ryan on Jul 10, 2012 Comments:
868.	Name: James E. Hirsch on Jul 10, 2012 Comments: I'm a 3rd generation San Francisco native. 100% opposed to the ABAG and MTC Plan. Bless Mimi Steel for bringing this matter to my attention
869.	Name: Vernon Dale on Jul 10, 2012 Comments: This hsould take as long as it took to fix the BAy Bridsge earthquake repair EIR.
870.	Name: FRANK MONTICELLI on Jul 10, 2012 Comments:
871.	Name: Edward Powell on Jul 10, 2012 Comments: You know what you can do with these unelected bureaucrats It's bad enough that we have to deal with the elected ones.Just the thought of the yahoos gives me a very sharp pain that makes it difficult to sit.
872.	Name: Sean Nissen on Jul 10, 2012 Comments:
873.	Name: Anonymous on Jul 10, 2012 Comments: I am completely against One Bay Area, wealth seizure, and domicile confiscation to force relocation into high-density housing. ABAG is over-reaching, and must be stopped.
874.	Name: Sheila Nielsen on Jul 10, 2012 Comments: We live in America! Not a communist dictatorship! We own our propertynot the U.N. (agenda 21) Stand up Americanow!! Why votewhen some un-elected liberals can dictate the use of our land?whether we like it or not!
875.	Name: Anonymous on Jul 10, 2012 Comments: I and my wife oppose One Bay Area, seizure of wealth, and forced relocation into high-density housing. ABAG has no rights under the US Constitution to perform any such Marxist attempts to rob us, and therefore must be made to hear opposing viewpoints and halt any further plans for One Bay Area.
876.	Name: Mike Williams on Jul 10, 2012 Comments:

From:	eircomments
To:	Mimi Steel
Date:	7/12/2012 10:04 AM
Subject:	Re: Petition to Extend Deadline of EIR Scoping1015 Signatures

Thank you for your comments; they will be considered carefully during the preparation of the Plan Bay Area Environmental Impact Report (EIR). To stay updated on Plan Bay Area and the environmental process, please visit www.onebayarea.org.

Ashley Nguyen, EIR Project Manager Metropolitan Transportation Commission 101 8th Street Oakland, CA 94607 (510) 817-5809

>>> "Mimi Steel" <<u>mimi.steel@att.net</u>> 7/11/2012 9:51 PM >>> Ashley,

Attached is the final version of the Petition to Extend Deadline of EIR Scoping. This document contains 1015 signatures. A hard copy of the first version which contained 875 signatures was mailed to you on July 10 so that it reached your offices today, July 11.

Mimi Steel

Mimi Steel

Citizens Alliance for Property Rights (CAPR)

President, SFBay CAPR

510-928-6464

<http://www.proprights.org/sfbay> www.proprights.org/sfbay.

<<u>http://www.bayarealiberty.org</u>> www.bayarealiberty.org

@912CalGal

Description: CAPR\_LOGO\_JPG.JPG



YOUR VOICE COUNTS This petition has collected 1015 signatures using the online tools at iPetitions.com

Printed on 07-12-2012

# **Extend Deadline on One Bay Area EIR**

Sponsored by: SFBay CAPR

## About the petition

Plan Bay Area is a proposed comprehensive plan to control land use, housing, and transportation policies throughout the nine-county San Francisco Bay Area. It is a joint product of the Association of Regional Governments (ABAG) and the Metropolitan Transportation Commission (MTC) with input from other regional agencies. Plan Bay Area will dramatically affect every resident of the San Francisco Bay Area. If adopted, the Plan will significantly restrict personal lifestyle choices, including where you live, how you travel, and your cost of living. The Plan transfers authority for the most critical public policy issues - land use, transportation, and housing - from elected local officials to unelected bureaucrats. It will also impose billions of dollars of unfunded expenses on local communities that are already facing huge budget deficits. MTC and ABAG have put in place a "fast track" process for adoption of a Plan that will affect virtually every aspect of your life. It is unlikely that even ten in 1,000 residents of the Bay Area have even heard of Plan Bay Area, much less understand how dramatically it will change their lives and limit the lifestyle choices of their children and grandchildren. ABAG and MTC have commissioned an environmental impact report (EIR) on Plan Bay Area that is seriously incomplete and inadequate. The scoping EIR process fails to address many critical issues, including highly questionable assumptions about population and economic growth, where the hundreds of billions of dollars needed to implement the plan will come from, and how the highly restrictive policies on land use, housing, and transportation will affect the environment and the quality of life in the region. ABAG and MTC have adopted a very aggressive schedule for adoption of the EIR - an essential next step toward adoption of the extremely controversial Plan Bay Area. The time for public comment has been severely limited - ABAG and MTC will cut off public comment on July 11, present final alternatives to MTC-ABAG on July 13 and to approve final alternatives on the EIR scoping on July19. Even worse, the process for public comment has been seriously deficient. Citizens have been instructed that "negative comments" on the Plan are not permitted and that the unelected consultants alone will decide which public comments on the EIR will be submitted to ABAG and MTC. We therefore call upon ABAG and MTC to reject the EIR scoping process as incomplete and inadequate and to extend the time for public comment on the next draft. The issues involved are critically important and decisions must not be made in haste without adequate time for review. The review process must allow maximum latitude for citizens to voice their views on the Plan and to demand complete examination of the most likely outcomes from its adoption. Because the plan amounts to a massive transfer of power from elected local officials to unelected regional bodies, the current review process may be the last opportunity for citizens to make their voices heard. This petition will be mailed (in mail and email format) to ABAG and MTC by July 10. If you support our efforts to ensure full and complete review and comment by citizens of the Bay Area, please add your signature below.

1. Name: Mimi Steel on Jul 02, 2012 Comments: MTC and ABAG would drastically affect life in the SFBay Area. We need to stop this top down, soviet style planning

2.	Name: Paul & Lois Brownlee on Jul 02, 2012 Comments: Stop the HSR LOW SPEED TRAIN TO NO WHERE! End the MTC and unelected representatives in ABAG. NOW!
3.	Name: Denis F. Quinn on Jul 02, 2012 Comments:
4.	Name: Janice Salvato on Jul 02, 2012 Comments:
5.	Name: Anne Krysiak on Jul 02, 2012 Comments:
6.	Name: James Brookhouser on Jul 02, 2012 Comments:
7.	Name: James W. Ricketts on Jul 02, 2012 Comments:
8.	Name: Barbara Schell on Jul 02, 2012 Comments: Stop this madness!!
9.	Name: Margarita Colin on Jul 02, 2012 Comments:
10.	Name: Frank Maffei on Jul 02, 2012 Comments:
11.	Name: Anonymous on Jul 02, 2012 Comments: One Bay Area is another plan by non elected officials to control us - usurping local governments say.
12.	Name: Gary Springer on Jul 02, 2012 Comments: Why are you stealing our rights to vote?
13.	Name: Patrick T. Peterson on Jul 02, 2012 Comments:
14.	Name: G. Charles Steiner on Jul 02, 2012 Comments: The draft EIR is incomplete and inadequate, I feel, and more time is necessary for public comment on the next draft. Not enough people know about the One Bay Area Plan yet, and the issues are too important to let it be rushed.
15.	Name: A. Hipona on Jul 02, 2012 Comments:
16.	Name: Howard Myers on Jul 02, 2012 Comments:
17.	Name: Arne Simonsen on Jul 02, 2012 Comments:

18.	Name: Elizabeth J Hendricks on Jul 02, 2012 Comments: Have attended meetings and found those in attendance are for the most part staff and special interest groups, not so much the general community, so there is really NO input from the community at large. The Bay Area Community needs to know and be informed regarding the plans that are being implemented in their name.
19.	Name: Tim Hensley on Jul 02, 2012 Comments: I am totally against this project. The outcome was planned from the start! Citizens will not tolerate this!
20.	Name: Connie Lathrop on Jul 02, 2012 Comments:
21.	Name: Tina Selene on Jul 02, 2012 Comments: I am against this Soviet type of living environment.
22.	Name: Judy Galletti on Jul 02, 2012 Comments: It is very important that ABAG, MTC and OneBayArea allow the citizens to participate in this process. At this point citizens have been ignored, disrespected, lied to, yelled at, interrupted, and locked out. Agendas have been changed at the last minute, meetings have been changed at the last minute, meetings have been held at inadequate times, meetings have been held in inadequate rooms. ABAG/MTC members have not been present as OneBayArea conducted their fraudulent survey meetings, I sign this petition with thanks and gratitude to the wonderful people in the Bay Area who are brave enough to lead us as we stand up against this tyranny.
23.	Name: Deborah Kerwin-Peck on Jul 02, 2012 Comments:
24.	Name: Carol Pascoe on Jul 02, 2012 Comments: You are acting like our domestic enemies. We have sworn to uphold the Constitution against you!
25.	Name: Pamela George on Jul 02, 2012 Comments: I call upon ABAG and MTC to reject the draft EIR as incomplete and inadequate and to extend the time for public comment on the next draft. These decisions MUST NOT BE MADE IN HASTE without adequate time for review!!!
26.	Name: Janet Songey on Jul 02, 2012 Comments:
27.	Name: Anonymous on Jul 02, 2012 Comments:
28.	Name: Suzanne Valente on Jul 02, 2012 Comments: This Draft EIR is seriously deficient in its objectives and content, and additionally the public has not been provided adequate time to comment. Further, officials attending public events have been unwilling or unable to answewr public questions which have a direct bearing upon the public's approval or disapproval of this project. Take the time and make the effort to do this lawfully.
29.	Name: Deborah Wyllie on Jul 02, 2012 Comments:
30.	Name: Marcia Wolfe on Jul 02, 2012 Comments:
31.	Name: Kevin Daniel on Jul 02, 2012 Comments:
32.	Name: Pamela Daniel on Jul 02, 2012 Comments:

33.	Name: Thomas Weissmiller on Jul 02, 2012 Comments:
34.	Name: Art Songey on Jul 02, 2012 Comments:
35.	Name: Anonymous on Jul 02, 2012 Comments:
36.	Name: Patrick Dullea on Jul 02, 2012 Comments: Unelected bureaucrats must be removed from the decision making / enforcement process of bay area planning. I stand in opposition to "Plan Bay Area". pd.
37.	Name: Anonymous on Jul 02, 2012 Comments:
38.	Name: John Hertzer on Jul 02, 2012 Comments: need COMPLETE review and comment by citizens
39.	Name: Anonymous on Jul 02, 2012 Comments:
40.	Name: Anonymous on Jul 02, 2012 Comments:
41.	Name: Howard Jack Smith on Jul 02, 2012 Comments: insane!
42.	Name: Joyce Adriance on Jul 02, 2012 Comments: The full impact of this plan must be made known to the citizens, who in financing it, are entitled to full disclosure.
43.	Name: Anonymous on Jul 02, 2012 Comments: Where is the public input and representation?We are not kept in the loop.Why are unelected bureaucrats making decisions that should be voted on?
44.	Name: Paul Dickey on Jul 02, 2012 Comments: This review process has been a farce.
45.	Name: Linda Withrow on Jul 02, 2012 Comments: I object to the Bay Area Plan having unelected officials make rulings on how my family & amp; I live, and travel within the 9 counties is wrongThere is so much big money already making important decisions & quot; on my behalf& quot; without any checks or balances, & amp; limited recourse I say NO to the Bay Area Plan!!!!
46.	Name: Patrick Cabral on Jul 02, 2012 Comments: the greed og ABAG needs to be halted!
47.	Name: Judith E Fletcher on Jul 02, 2012 Comments: Let's hope that this isn't the last chance to rebuke this outrageous plan. Anything worth doing, will withstand the LIGHT OF DAY and public input. We're not all sheep and many of us even think for ourselves.
48.	Name: Al Pori on Jul 02, 2012 Comments:
49.	Name: Joel Fine on Jul 02, 2012 Comments:

50. Name: Amy Chorney on Jul 02, 2012 Comments:

51.	Name: Judy Grote on Jul 02, 2012 Comments: This should not be rushed through. More Bay Area residents need to be educated on the plan so that they can provide input. The data upon which the plan is based is questionable. Elected officials need to be held responsible, nor more unelected 'consultants; and bureaucrats that are responsive to no one but themselves. The constituents which pay the taxes need to be given adequate time to inform themselves. Private property needs to be respected.
52.	Name: Tom Harpham on Jul 02, 2012 Comments:
53.	Name: Susan Kirsch on Jul 02, 2012 Comments:
54.	Name: Scott A. Jones on Jul 02, 2012 Comments: This is an economic and cultural disaster for California. Besides the drastic loss of personal liberty and private property rights, this entire process is being conducted without the consent of the general population. Zero effort has been put forth into public awareness via Radio, television or newsprint education and information.
55.	Name: Beth Calvert on Jul 02, 2012 Comments:
56.	Name: Vince Wright on Jul 02, 2012 Comments:
57.	Name: Ann Price on Jul 02, 2012 Comments:
58.	Name: Anonymous on Jul 02, 2012 Comments:
59.	Name: Anonymous on Jul 02, 2012 Comments:
60.	Name: Ortrud Witt on Jul 02, 2012 Comments: The American people are tired of having politicians and bureacrats fast shuffling self serving legislation and plans at us.
61.	Name: Ron Kilmartin on Jul 02, 2012 Comments: This deserves a one-year or so Bay-Area wide media blitz on TV and internet and newspapers, conducted under the supervision of leaders from the Tea Party and associated organizations, not MTC-ABAG or their bureaucrats and NGOs. This plan is to substitute an entirely different form of local government in which we the people have no say. How could such a scheme be proposed in America? The idea of bureaucrats and NGOs sitting in a council of dictators is straight out of the tyrannical governing structure of the old Soviet Union - soviets - unelected councils run by all-powerful members of the Communist Party.
62.	Name: Al Pori on Jul 02, 2012 Comments:
63.	Name: Jeffrey Wolk on Jul 02, 2012 Comments:
64.	Name: Russell Brabec on Jul 02, 2012 Comments:
65.	Name: Barbara Decker on Jul 02, 2012 Comments: The citizens request that an extension of the plan so more citizens can learn what is happening. Too many people have been kept in the dark and need to know what is happening.

66. Name: Glenn Steiding on Jul 02, 2012 Comments: This scheme will never work unless an Asteroid hits the planet, wipes out all human life, and after eons, the Earth is repopulated with mindless clones that want to be led around by the nose.

67.

Name: Margie Liberty

on Jul 02, 2012

Comments: This plan is government run amuck and must not be allowed to go any further. The people will rise up. 68. Name: Susan Mister on Jul 02, 2012 Comments: 69. Name: Larry Busboom on Jul 02, 2012 Comments: 70. Name: Jan Mitchell on Jul 02, 2012 Comments: 71. Name: Georgine Scott-Codiga on Jul 02, 2012 Comments: on Jul 02, 2012 72. Name: Jennifer L Bright Comments: 73. Name: Carl Hyndman on Jul 02, 2012 Comments: 74. Name: Anonymous on Jul 02, 2012 Comments: 75. Name: Jerlyn Hollars on Jul 02, 2012 Comments: The most scarey words you'll ever hear, I'm from the government and I'm here to help." Keep the government out of my life! Enough already. 76. Name: Dr. Ronald Corselli on Jul 02. 2012 Comments: 77. Name: Dale Jelsema on Jul 02, 2012 Comments: This plan needs to be reviewed by local cities as to how to pay all the additional cost to taxpayers. 78. Name: Cynthia Wehbe on Jul 02, 2012 Comments: 79. Name: Peter Lambertson on Jul 02, 2012 Comments: 80. Name: Anonymous on Jul 02, 2012 Comments: In the name of individual freedom for every citizen of the Bay Area, I protest this blatant usurpation of power by unelected officials who wish to dictate how the rest of us should live. 81. Name: Anonymous on Jul 02, 2012 Comments: 82. Name: Sharron D. Nuno on Jul 02, 2012 Comments:

Name: Robert Fulton on Jul 02, 2012
 Comments: ABAG and MTC members, respectfully, we fellow citizens request each of you keep in mind, that an individual's right to

his/her property is the foundation upon which The Constitution of the United States of America sits...act to help preserve that right for us and our children and their children.

Robert Fulton, San Jose.

84.	Name: Theresa Curt on Jul 02, 2012 Comments:
85.	Name: Donald R. Connors on Jul 02, 2012 Comments:
86.	Name: Mihai Bulea on Jul 02, 2012 Comments:
87.	Name: Michael Foley on Jul 02, 2012 Comments:
88.	Name: Leslie E Baker on Jul 02, 2012 Comments:
89.	Name: Nancy Foley on Jul 02, 2012 Comments:
90.	Name: Dennis Cookinham on Jul 02, 2012 Comments:
91.	Name: Anonymous on Jul 02, 2012 Comments:
92.	Name: Glenda Kitchel on Jul 02, 2012 Comments: WE DO NOT NEED THIS! YOU NEED TO PUT A STOP TO THIS AGENDA 21 NOW!
93.	Name: Brian R Cameron on Jul 02, 2012 Comments:
94.	Name: Mary Buntz on Jul 02, 2012 Comments:
95.	Name: David Torrisi on Jul 02, 2012 Comments:
96.	Name: Robert P. Marshall on Jul 02, 2012 Comments: ABAG & MTC should be elected by the people & not appointed.
97.	Name: Anonymous on Jul 02, 2012 Comments:
98.	Name: Bruce Johnson on Jul 02, 2012 Comments:
99.	Name: Greg Gardner on Jul 02, 2012 Comments:
100.	Name: Lalla Stark on Jul 02, 2012 Comments: our voices must be heardreject the draft

101. Name: John Greenagel on Jul 02, 2012 Comments: The entire process by which ABAG and MTC have developed and promoted the massive power grab that is Plan Bay Area is shameful.

102.	Name: Vickie Swing on Jul 02, 2012 Comments:
103.	Name: Charles Walker on Jul 02, 2012 Comments:
104.	Name: Christopher H. Brown on Jul 02, 2012 Comments:
105.	Name: Kathleen M Thomson on Jul 02, 2012 Comments:
106.	Name: Dennis Thomson on Jul 02, 2012 Comments:
107.	Name: Raymond Sarakaitis on Jul 02, 2012 Comments: The far reachings of this proposal has such stifling effects on personal freedoms. This whole concept is so unbelievable. The "Politburo" can't be far behind.
108.	Name: Anonymous on Jul 02, 2012 Comments: What happened to our freedoms? We are a free nation until ABAG; please look to individual rights and not collectivism
109.	Name: Carol Tomlinson on Jul 02, 2012 Comments:
110.	Name: Anonymous on Jul 02, 2012 Comments:
111.	Name: Anonymous on Jul 02, 2012 Comments:
112.	Name: Lewis Greene on Jul 02, 2012 Comments: NO NO NO
113.	Name: Amanaa Rendall on Jul 02, 2012 Comments:
114.	Name: Diana G Huenerbein on Jul 02, 2012 Comments:
115.	Name: Anonymous on Jul 02, 2012 Comments:
116.	Name: Jacqueline Morris on Jul 02, 2012 Comments: I object to this entire plan as well as the way it is being put in placefew or our citizens are even aware of what is planned
117.	Name: Verlayne Cave on Jul 02, 2012 Comments:
118.	Name: Robert White on Jul 02, 2012 Comments:

119.	Name: Debra Tash on Jul 02, 2012 Comments: Don't make the mistake of adopting this power grabbing plan.
120.	Name: Leland And Mary Stanley on Jul 02, 2012 Comments:
121.	Name: Sara Volking on Jul 02, 2012 Comments:
122.	Name: Fred Volking on Jul 02, 2012 Comments:
123.	Name: Glenda Kitchel on Jul 02, 2012 Comments: Stop thisOne Bay area plan, We don't want it! It is wrong for freedom loving people!
124.	Name: Anonymous on Jul 02, 2012 Comments: The plan as proposed will severely restrict our freedom and degrade our quality of life. It will have a negative impact on individuals and families in their daily living with NO scientifically proven benefit to the environment!
125.	Name: LA VERNE D. OYARZO on Jul 02, 2012 Comments:
126.	Name: William Moniz on Jul 02, 2012 Comments:
127.	Name: James S. Flippen on Jul 02, 2012 Comments: I always favor fewer rules and regulations. This one appears to be dangerous
128.	Name: Donna P. Gillies on Jul 02, 2012 Comments: It is absolutely necessary for we, the people, to have complete, open and factual information as well as time to digest and discuss the adoption of the Plan Bay Area. Environmental concerns are not an excuse to transfer power from the people and their duly elected representatives unless those being represented agree to that transfer of power. The fast track approach for adoption of the EIR raises a lot of red flags regarding the honesty and true intent of this movement.
129.	Name: Anonymous on Jul 02, 2012 Comments:
130.	Name: Charles Quisenberry on Jul 02, 2012 Comments:
131.	Name: Donna P. Gillies on Jul 02, 2012 Comments: It is absolutely necessary for we, the people, to have complete, open and factual information as well as time to digest and discuss the adoption of the Plan Bay Are. Environmental concerns are not an excuse to transfer power from the people and their duly elected representatives unless those being represented agree to that transfer of power. The fast track approach for adoption of the EIR raises a lot of red flags regarding the honesty and true intent of this movement.
132.	Name: Marshall W Jackman on Jul 02, 2012 Comments: This violation of private property rights and Constitutional principals must stop'
133.	Name: Jean Ryan on Jul 02, 2012 Comments:
134.	Name: Olivia on Jul 02, 2012

135.	Name: Olivia on Jul 02, 2012 Comments:
136.	Name: Deanna Thompson on Jul 02, 2012 Comments:
137.	Name: Franklin Henry on Jul 02, 2012 Comments:
138.	Name: Margaret Murguia on Jul 02, 2012 Comments: STOP "One Bay Area Plan". It will destroy our lives and freedoms.
139.	Name: Michael Shadwick on Jul 02, 2012 Comments:
140.	Name: Fredrick Hills on Jul 02, 2012 Comments: I'm not willing to surrender my rights and liberties to any bureaucrat, government or politician or trust them to protect them either. History has proven that they usually fail at it miserably
141.	Name: Denise K. Gianni on Jul 02, 2012 Comments: Give me liberty or give me death!! I will die standing, NOT on my knees, begging 'please'!! STOP BAY AREA PLAN NOW!
142.	Name: Anonymous on Jul 02, 2012 Comments: Freedom!!!!!!!!!!!
143.	Name: Michael Black on Jul 02, 2012 Comments:
144.	Name: Suzanne Rodriguez on Jul 02, 2012 Comments:
145.	Name: Patt Brown on Jul 02, 2012 Comments:
146.	Name: Ken Brown on Jul 02, 2012 Comments:
147.	Name: George Bruner, Sr. on Jul 02, 2012 Comments:
148.	Name: Michelle Kralovec on Jul 02, 2012 Comments: I absolutely support this petition. One Bay Area/ Agenda 21 has gone way too far and needs to stop! It goes aginst the fundamental rights of ever USA Citizen our property rights and our freedoms
149.	Name: Anonymous on Jul 02, 2012 Comments:
150.	Name: Anonymous on Jul 02, 2012 Comments:
151.	Name: Nanci Quinn on Jul 02, 2012 Comments:
152.	Name: Philip Graf on Jul 02, 2012

Name: Philip Graf on Jul 02, 2012 Comments: We, the voters do NOT want political power shifted from our elected representatives to unelected bureaucrats -- all

153.	Name: Robert Hauser on Jul 02, 2012 Comments: We have had to endure far too much sovietization of our lives by numerous oligarchies of fat salaried unelected bureaucrats as isthank you just the same. In just so many wordsABAG and MTC, kindly get the Hell out of our faces, out of our lives and out of our billfolds, you are trespassing on our Constitution, butt out now!!!!!!!
154.	Name: Daniel Prior on Jul 02, 2012 Comments:
155.	Name: Ken Paxton on Jul 02, 2012 Comments: I wish the people of the nine bay area counties knew about this plan.
156.	Name: Roberta Torres on Jul 02, 2012 Comments:
157.	Name: Stephen McDougall on Jul 02, 2012 Comments:
158.	Name: Brian Boone on Jul 02, 2012 Comments: Stop the maddness and fix the budget
159.	Name: Steve Meyer on Jul 02, 2012 Comments: Lets stop this from happening it is not good for our counrty. To much power will be transfered to dishonest non-elected officials with agenda's.
	God Bless
160.	Name: Ann Miller on Jul 02, 2012 Comments:
161.	Name: Marilee Wilson on Jul 02, 2012 Comments: I dissaprove of the EIR draft
162.	Name: Anonymous on Jul 02, 2012 Comments:
163.	Name: Harry A Phillips on Jul 02, 2012 Comments:
164.	Name: Lois Kleinkauf on Jul 02, 2012 Comments: I wish to retain local control concerning my life and property - not regional, state, national, or international.
165.	Name: Lorelyn Hechtman on Jul 02, 2012 Comments: If the bureaucrates are not open/ responsive/ interested in all ideas and suggestions it strongly suggests they have their own agenda, want to be left alone to do what they want and are not representative of the fellow Bay Area citizens so I do not want them to speak/ or to do ANY THING on my behalf. Unrestricted, unwanted, uninformed on what is wished for the freedom appreciating general public. Do not have another collective bureau telling the tax payers what and when to do Anything. Desolve the Committeego home and encourage collective good minds to go after what is best for the vast, educated, legal minds that want the Bay Area to function safely for centuries.
166.	Name: John Irwin on Jul 02, 2012 Commente: All their place are a result of UN Agenda 21 implementation, which is unconstitutional but agreed to by Hillary Clipton

Comments: All their plans are a result of UN Agenda 21 implementation, which is unconstitutional but agreed to by Hillary Clinton and the past four Presidents. This is one of the major goals of the Tea Party, of which I am a leader, to dismantle. It is being forced on unsuspecting City and County Governments by the Builder-berg group of 120 multi Billionaires who want one world government. All of which is being performed under the Radar. If you are not familiar with the Scheme, I would gladly bring you up to speed.

John

167.	Name: Dan The Man on Jul 02, 2012 Comments:
168.	Name: Tammy Heimgartner on Jul 02, 2012 Comments: This kind of deception and quick movement is what is hurting our country. Glad for my friend who is more dialed in than I in capturing this type of undisclosed change in our society!
169.	Name: Regina Vann on Jul 02, 2012 Comments:
170.	Name: Ari Goldberg on Jul 02, 2012 Comments:
171.	Name: Michael Paonessa on Jul 02, 2012 Comments:
172.	Name: Anonymous on Jul 02, 2012 Comments:
173.	Name: Barbara White on Jul 02, 2012 Comments:
174.	Name: BARRY N. NATHAN on Jul 02, 2012 Comments:
175.	Name: BARRY N. NATHAN on Jul 02, 2012 Comments:
176.	Name: Dennis Kitainik on Jul 02, 2012 Comments:
177.	Name: David Chaney on Jul 02, 2012 Comments: Each county and city needs to retain control, via elected officials, of their county and city. We do not need more tyranny at the county and city levels that we are already experiencing at the state and federal levels.
178.	Name: Richard James on Jul 03, 2012 Comments:
179.	Name: Anonymous on Jul 03, 2012 Comments:
180.	Name: Anonymous on Jul 03, 2012 Comments:
181.	Name: Warren Gibson on Jul 03, 2012 Comments:
182.	Name: Jennifer Singh on Jul 03, 2012 Comments:
183.	Name: Anonymous on Jul 03, 2012 Comments: The EIR is inadequate. The population figures used were not sourced properly, and they did not give a range of potential population figures.

Name: Anonymous on Jul 03, 2012 Comments:
Name: Robert Pegram on Jul 03, 2012 Comments: Unelected bureaucrats should not have power to take freedom from citizens.
Name: Deborah Woehrle on Jul 03, 2012 Comments:
Name: Mark S Lerner on Jul 03, 2012 Comments:
Name: Anonymous on Jul 03, 2012 Comments:
Name: Henry Kachuck on Jul 03, 2012 Comments: Local Citizens need to decide how to best use local PUBLIC and PRIVATE land. PERIOD!!!!
Name: Alexa Abrishamian on Jul 03, 2012 Comments: It is an outrage that such a plan, that affects peoples' lives at every level, is being rushed through. The people of the Bay Area must be given an opportunity to learn about the plan and let their voices be heard!!!!!
Name: Anonymous on Jul 03, 2012 Comments:
Name: Roxanne Albertoli on Jul 03, 2012 Comments:
Name: Robert Dietrich on Jul 03, 2012 Comments: More time is needed!!!
Name: Janice Allgower on Jul 03, 2012 Comments: Let us just BESTOP trying to take all our rights from us!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!
Name: Doug Forsyth on Jul 03, 2012 Comments:
Name: Amy Tran on Jul 03, 2012 Comments:
Name: Sharon Reinfeld on Jul 03, 2012 Comments:
Name: Beverly Potter on Jul 03, 2012 Comments: We need more public comment.
Name: Nina Ortega on Jul 03, 2012 Comments:
Name: Kirsty Burns on Jul 03, 2012 Comments:

201. Name: Anonymous on Jul 03, 2012

Comments: I never got to vote yay or nay for this plan because none of the questions concerned citizens were asking ever got answered. They were standard questions that many of us had regarding where the money would come from, why special environmental exemptions for developers since this is all being done under an environmental improvement bill, what the enormous

growth numbers were based on since companies and businesses are leaving the state for better economic opportunities. This plan in my opinion is the start of creating ghettos since they are highly subsidized, have no funding from the local economy to keep them maintained after they are built. Additionally, this plan requires the confiscation of private property without any due process for the owners or the local citizens. For something this huge hardly anyone I have tried to speak to about this have no idea what is going on. The media is silent on this effort and I can't understand why the rush to get this all done behind the backs of California citizens. You need to engage all citizens by getting this out to the media so everyone can know what is being proposed and decided on. Citizens are busy but they will stop and listen when you engage them properly. The ones I've seen attend the meetings and try to get answers from the agencies were met with overwhelming opposition from the agencies as if the job of the agencies was just to give lip service to anyone who dissented. The agencies provided no response to any dissenting questions. However, they always had answers for those who showed they were for their plans. The dissenters far outweighed the supporters at the meetings. The agencies involved in the meetings never intended to answer questions from the concerned public. The proof is that the concerned public has not received any answers to their reasonable questions.

202.	Name: Susan Morse on Jul 03, 2012 Comments:
203.	Name: Chuck Costello on Jul 03, 2012 Comments: This project needs to be delayed until the public is properly informed!!
204.	Name: Diane Costello on Jul 03, 2012 Comments:
205.	Name: Burton E. Worrell on Jul 03, 2012 Comments:
206.	Name: Vickie Bell on Jul 03, 2012 Comments: Incomplete and inadequate draft EIR. Deadline needs to be extended!
207.	Name: Larry Yelowitz, PhD on Jul 03, 2012 Comments: This blatant power grab by ABAG and MTC must be subjected to painstaking scrutiny by the citizens affected.
208.	Name: Richard Loutensock on Jul 03, 2012 Comments:
209.	Name: JAMES A MILLER on Jul 03, 2012 Comments: Stop this dictatorship of telling me how to live because you liberials think (if thats even a possibility that you could ever think about anything except what your Berkeley liberial professors taught you) is best for meif you don't like freedom, head for Cuba or Iranget the damn bullshit government out of my lifeassholeswhat abunch of sorry people
210.	Name: Anonymous on Jul 03, 2012 Comments:
211.	Name: Gary Edwards on Jul 03, 2012 Comments:
212.	Name: Anonymous on Jul 03, 2012 Comments:
213.	Name: Rosslynne McCullough on Jul 03, 2012 Comments: Keep Saratoga an ABAG free zone. Thank you for all you do for our community.
214.	Name: Jack McCullough on Jul 03, 2012 Comments: Keep the UN out of my state and country.
215.	Name: Anonymous on Jul 03, 2012 Comments:
216.	Name: Phyllis A McKenna on Jul 03, 2012

Comments: This plan limits our freedom and is enacted without the knowledge or votes of the public by unelected bureaucrats. No, no,no!!!

217.	Name: Nancy Stevens on Jul 03, 2012 Comments:
218.	Name: Glenn Gelineau on Jul 03, 2012 Comments: This whole One Bay Area Plan has been flawed right from the get go, in terms of public engagement.
219.	Name: Elizabeth Mccarthy on Jul 03, 2012 Comments: Many Americans fought and died for liberty and the Constitution which guarantees life, liberty and the pursuit of happiness. Property rights must be protected and we must be protected from legislation which puts environment above individual rights and freedom. What value is citizenship if those rights guaranteed by the Constitution are trampled?
220.	Name: Anonymous on Jul 03, 2012 Comments: we do not need another layer of regional government or control
221.	Name: Paul R. Scherer on Jul 03, 2012 Comments:
222.	Name: Brandon Wilborn on Jul 03, 2012 Comments:
223.	Name: Jeff Smith on Jul 03, 2012 Comments:
224.	Name: Jeff Smith on Jul 04, 2012 Comments:
225.	Name: Lowell Johnson on Jul 04, 2012 Comments: Stop the insanity, before I have to move to Russia or China to have more personal liberty!
226.	Name: Anonymous on Jul 04, 2012 Comments:
227.	Name: Frances Hills on Jul 04, 2012 Comments: I want choices and have elected officials to represent me. I do not want unelected officials to make those decisions.
228.	Name: Linda Paine on Jul 04, 2012 Comments:
229.	Name: Barbara Kronewitter on Jul 04, 2012 Comments:
230.	Name: Jim Sanders on Jul 04, 2012 Comments: Please stop regulating away our inalienable rights
231.	Name: Jaime Castro on Jul 04, 2012 Comments:
232.	Name: Pat Ferguson on Jul 04, 2012 Comments: I have attended several meetings of OneBayArea. In looking at the plan it is clear it was done quickly to push it through without a clear look at the environmental impact of this plan on individual's health and welfare, especially of the poor and minority communities.
	Their plans are clearly incomplete at best, clearly not adaquately addressing many environmental issues within the cities and areas near to Bart.

As a former Social Worker, I see mental health issues arriving from their plans that they did not even address. Ever try to raise a baby or small children in a high-rise or high density area? Not fun or healthy for mom or kids. Stress levels under such conditions incrase greatly.

I hope you delay the implementation of this plan until the full impact on the environment within the cities and adverse health affects on poor women and children are fully address. Over crowding increases stress levels and is particularly dangerous to pregnant women, the elderly and small children.

Let's not try to do something to help the poor and end up endangering their health and the health of our urban environments.

233.	Name: Larry E. Mosler on Jul 04, 2012 Comments: I will sign it.
234.	Name: JERRY JORDAN on Jul 04, 2012 Comments: GOOD WORK!!!
235.	Name: Anonymous on Jul 04, 2012 Comments:
236.	Name: Joy on Jul 04, 2012 Comments: Thanks,
237.	Name: Haran on Jul 04, 2012 Comments: Thanks,
238.	Name: Jeff Smith on Jul 04, 2012 Comments:
239.	Name: Jeff Smith on Jul 04, 2012 Comments:
240.	Name: Laurie Jones on Jul 05, 2012 Comments: For the people by the people. Let the peoples voices be heard. No more behind closed doors decisions. This is a democracy not dictatorship, socialism or communism !~!!
241.	Name: Aubrey Freedman on Jul 05, 2012 Comments: We need more time to find out what's going on here. One size fits all may not work for everyone's lifestyle. Please extend the deadline for public comment.
242.	Name: Phyllis Couper on Jul 05, 2012 Comments: the draft EIR is incomplete. It should be rejected and a new review process put in place for maximum review and input by the public.
243.	Name: Janet Maiorana on Jul 05, 2012 Comments: I oppose Plan Bay Area on too many grounds to list here. If the plan is good, why are communities being threatened with loss of rightful return to sourch funds?
244.	Name: Starchild (At-Large Representative, Libertarian Party Of California Executive Committee) on Jul 05, 2012 Comments: Freedom is the answer. What's the question? No, really, what's the question?
245.	Name: Christopher Sordello on Jul 05, 2012 Comments:
246.	Name: Robert Wright on Jul 05, 2012 Comments:
247.	Name: Dave LeClercq on Jul 05, 2012 Comments:

248.	Name: Anonymous on Jul 05, 2012 Comments:
249.	Name: Anonymous on Jul 05, 2012 Comments:
250.	Name: Randy Dreiling on Jul 05, 2012 Comments: Don' Tread On Me
251.	Name: Elias A. Ramos on Jul 05, 2012 Comments:
252.	Name: Anonymous on Jul 05, 2012 Comments:
253.	Name: Jeffrey Hunter on Jul 05, 2012 Comments: I detest our California state and local governments.
254.	Name: Wayne Rundle on Jul 05, 2012 Comments:
255.	Name: Wayne Rundle on Jul 05, 2012 Comments:
256.	Name: Wayne Rundle on Jul 05, 2012 Comments:
257.	Name: IRVIN E. CHAMBERS on Jul 05, 2012 Comments: Read all about this in the book
	ECO TYRANNY
	BY BRIAN SUSSMAN
258.	Name: Anonymous on Jul 05, 2012 Comments:
259.	Name: Anonymous on Jul 05, 2012 Comments: Welcome to Xalifornia!
260.	Name: Fernando Navarro on Jul 05, 2012 Comments: you'll have to wrench freedom from my dead cold hands before i allow anyone to passively build " Auschwitz" around me!!!!
261.	Name: William Clark on Jul 05, 2012 Comments: Keep up the good work! Private property and individual Liberty are too important to let go of.
262.	Name: Anonymous on Jul 05, 2012 Comments:
263.	Name: Rosemary Sanders on Jul 05, 2012 Comments:
264.	Name: Mike Pavlovich on Jul 05, 2012 Comments:

265.	Name: Kimberly Himes on Jul 05, 2012 Comments: This agenda is not right we live in American not Europe. We have rights and freedoms this agenda steals everything that america stands for. Stop this now we the people do not agree with this
266.	Name: Judith A. Bellack on Jul 05, 2012 Comments:
267.	Name: Tony Michael on Jul 05, 2012 Comments: I agree wholeheartedly with this petition!
268.	Name: Larry White on Jul 05, 2012 Comments:
269.	Name: Anonymous on Jul 05, 2012 Comments:
270.	Name: Edmund F Goedde on Jul 05, 2012 Comments: Our elected city and county leaders are responsible for our area. This power may not be transferred to an unelected body.
271.	Name: Larry White on Jul 05, 2012 Comments:
272.	Name: Donna Andersen on Jul 05, 2012 Comments:
273.	Name: John Vonhof on Jul 05, 2012 Comments:
274.	Name: Alisa Ortlieb on Jul 05, 2012 Comments:
275.	Name: Susan Caudill on Jul 05, 2012 Comments:
276.	Name: AMARCY BERRY on Jul 05, 2012 Comments: I am not at all satisfied with the plans to transfer control of transportation, land use, and job opportunities to unelected bureaucrats. A glimpse of the future behavior to be expected is the surreptitious way this plan is being pushed upon us.
277.	Name: Melanie J. Kent on Jul 05, 2012 Comments:
278.	Name: Tim Turner on Jul 05, 2012 Comments:
279.	Name: Shirlee Pierce on Jul 05, 2012 Comments: The most dangerous aspect of this plan is that because these people are not elected, they cannot, and will not be held accountable for their actions. They are not subject to recall nor is there any other remedy available to us to get rid of them.
280.	Name: Anonymous on Jul 05, 2012 Comments: Government should adjust to user input especially since it is our money that drives this.
281.	Name: Anonymous on Jul 05, 2012 Comments:

282. Name: Robert White on Jul 05, 2012

Comments: We don't need any more government bureaucrats running our lives, telling us what to do and stealing our freedoms.

283.	Name: Anonymous on Jul 05, 2012 Comments:
284.	Name: Anonymous on Jul 05, 2012 Comments:
285.	Name: Tina Shub on Jul 05, 2012 Comments:
286.	Name: Charles Cagnon on Jul 05, 2012 Comments: One Bay Area is intellectually and morally unfounded and has been pushed in an unethical fashion. Regional government is not self-government.
287.	Name: Charles Cagnon on Jul 05, 2012 Comments: One Bay Area is intellectually and morally unfounded and has been pushed in an unethical fashion. Regional government is not self-government.
288.	Name: Michael Denny on Jul 05, 2012 Comments: Keep the power with the people and property ownersthis is nothing but a power grab under cover of the already discredited fake science/religion of environmentalism.
289.	Name: Francoise Fielding on Jul 05, 2012 Comments:
290.	Name: Anonymous on Jul 06, 2012 Comments:
291.	Name: F. D. Crutchfield on Jul 06, 2012 Comments:
292.	Name: Jan Pinney on Jul 06, 2012 Comments: Allow citizens to provide input to the plan that is in opposition to the pre-determined "citizen input" developed by beaurocrats, rather than from grass-roots citizen input.
293.	Name: Janet Songey on Jul 06, 2012 Comments:
294.	Name: Art Songey on Jul 06, 2012 Comments:
295.	Name: Jordan Songey on Jul 06, 2012 Comments:
296.	Name: Carl Hyndman on Jul 06, 2012 Comments:
297.	Name: Brent Songey on Jul 06, 2012 Comments:
298.	Name: Justine Songey on Jul 06, 2012 Comments:

299.	Name: Anonymous on Jul 06, 2012 Comments:
300.	Name: Bev Barnes on Jul 06, 2012 Comments:
301.	Name: Denis F. Quinn on Jul 06, 2012 Comments:
302.	Name: Norma Coe on Jul 06, 2012 Comments:
303.	Name: Ray And Maralyn Killorn on Jul 06, 2012 Comments: We want government and associated planners out of the Bay Area.
304.	Name: Tom Woehrle on Jul 06, 2012 Comments:
305.	Name: James Seif on Jul 06, 2012 Comments:
306.	Name: Jennifer Delany on Jul 06, 2012 Comments: stop Agenda 21
307.	Name: Jennifer Delany on Jul 06, 2012 Comments:
308.	Name: Dan Roberts on Jul 06, 2012 Comments:
309.	Name: Terry Gossett on Jul 06, 2012 Comments:
310.	Name: Dennis Garidel on Jul 06, 2012 Comments:
311.	Name: Christopher J Pareja on Jul 06, 2012 Comments: Please extend the deadline for the draft environmental impact report to allow proper time for public input.
312.	Name: George Tash on Jul 06, 2012 Comments:
313.	Name: Jennifer Tash-Amodei on Jul 06, 2012 Comments:
314.	Name: Ivan Amodei on Jul 06, 2012 Comments:
315.	Name: Rachel Janowicz on Jul 06, 2012 Comments:
316.	Name: Adam Tash on Jul 06, 2012 Comments:
317.	Name: Joey Porter on Jul 06, 2012

## Comments:

318.	Name: Jacque Porter on Jul 06, 2012 Comments:
319.	Name: Pete Van Rijn on Jul 06, 2012 Comments:
320.	Name: Mike McCullough on Jul 06, 2012 Comments:
321.	Name: Bob Mendoza on Jul 06, 2012 Comments: I agree with all of the comments
322.	Name: Bill Moniz on Jul 06, 2012 Comments: This Plan does not need to be fast tracked, it is already going too fast for most people to become aware of the impact of your decisions. Perhaps that is the idea, to keep the public in the dark while the unelected bureaucrats make decisions that affect our lives. Enough is enough.
323.	Name: Connie on Jul 06, 2012 Comments:
324.	Name: Connie on Jul 06, 2012 Comments:
325.	Name: Mark Ackerman on Jul 06, 2012 Comments:
326.	Name: Mary Isaacs on Jul 06, 2012 Comments:
327.	Name: Glenn Smentek on Jul 06, 2012 Comments: stop the further Socialization of California
328.	Name: Joseph Madre on Jul 06, 2012 Comments:
329.	Name: Paul Kent on Jul 06, 2012 Comments:
330.	Name: Sharon Giottonini on Jul 06, 2012 Comments:
331.	Name: Leslie Tozzini on Jul 06, 2012 Comments:
332.	Name: Douglas Tozzini on Jul 06, 2012 Comments:
333.	Name: Barbara Decker on Jul 06, 2012 Comments:
334.	Name: James M Croft on Jul 06, 2012 Comments: I suipport the efforts to keep goverment out of private property rights

335.	Name: Chris Decker on Jul 06, 2012 Comments:
336.	Name: Rachel Decker on Jul 06, 2012 Comments:
337.	Name: Al Vittek on Jul 06, 2012 Comments:
338.	Name: Gini Spicer on Jul 06, 2012 Comments:
339.	Name: Shannon Russell on Jul 06, 2012 Comments:
340.	Name: Mark Russell on Jul 06, 2012 Comments:
341.	Name: Michael Spicer on Jul 06, 2012 Comments:
342.	Name: Loralee on Jul 06, 2012 Comments:
343.	Name: Diana G Huenerbein on Jul 06, 2012 Comments:
344.	Name: Anonymous on Jul 06, 2012 Comments:
345.	Name: Thomas James on Jul 06, 2012 Comments:
346.	Name: Anonymous on Jul 06, 2012 Comments:
347.	Name: Susan Hart on Jul 06, 2012 Comments: Today Green means "green on the outside; red on the inside." What people used to think it meant was that ordinary citizens set the course for our own individual preferences and control of our property. Now it means the elected and unelected officials wrest control out of your hands in the name of preserving open space and saving land for your children while they take control and set the agenda and limit your freedom instead of limiting government.
348.	Name: Carol Pascoe on Jul 06, 2012 Comments:
349.	Name: Donald L. Williams on Jul 06, 2012 Comments:
350.	Name: Thomas Luekens on Jul 06, 2012 Comments:
351.	Name: Norman H. Reece on Jul 06, 2012 Comments:
352.	Name: Norman H. Reece on Jul 06, 2012 Comments:

353.	Name: John Gordon on Jul 06, 2012 Comments:
354.	Name: Jose Ornelas on Jul 06, 2012 Comments: It seems all the data you acquire is "cherry picked" to support your previous assumptions
355.	Name: Allan Ward on Jul 06, 2012 Comments:
356.	Name: Sharon Marston Erickson on Jul 06, 2012 Comments: Don't give up. We must preserve our God given liberty!
357.	Name: Mary Spicer on Jul 06, 2012 Comments:
358.	Name: Virginia Roush on Jul 06, 2012 Comments:
359.	Name: Joseph Barocio on Jul 06, 2012 Comments:
360.	Name: Linda J Homen on Jul 06, 2012 Comments:
361.	Name: Francis M Leo on Jul 06, 2012 Comments:
362.	Name: Francis P Homen-Leo on Jul 06, 2012 Comments:
363.	Name: Tom Buckless on Jul 06, 2012 Comments: we don't want your commie BS.
364.	Name: Jeffrey Wolk on Jul 06, 2012 Comments:
365.	Name: Robert Bradford on Jul 06, 2012 Comments: Long live Prop. 13
366.	Name: Pamela George on Jul 06, 2012 Comments: I ask that ABAG and MTC reject the draft EIR as incomplete and inadequate and to extend the time for PUBLIC comment on the next draft. Thank you.
367.	Name: Rick Hills on Jul 06, 2012 Comments:
368.	Name: Laurie Duff on Jul 06, 2012 Comments:
369.	Name: Anonymous on Jul 06, 2012 Comments: stop trying to control my life!
370.	Name: Anonymous on Jul 06, 2012 Comments:

371.	Name: Michael E. Hancock on Jul 06, 2012 Comments:
372.	Name: Donald Sylvia on Jul 06, 2012 Comments:
373.	Name: John Parkhurst on Jul 06, 2012 Comments:
374.	Name: Kathleen DiStasio on Jul 06, 2012 Comments:
375.	Name: Anonymous on Jul 06, 2012 Comments: I am in full favor of this that protects our property rights and rights as USA citizens!
376.	Name: Jack Wagstaff on Jul 06, 2012 Comments: this is yet more government and restriction of our fought for freedom being eroded.
377.	Name: Mark Polhemus on Jul 06, 2012 Comments:
378.	Name: Michael Bowcut on Jul 06, 2012 Comments:
379.	Name: Kimberly Abold on Jul 06, 2012 Comments:
380.	Name: Leland And Mary Stanley on Jul 06, 2012 Comments:
381.	Name: James Radetich on Jul 06, 2012 Comments:
382.	Name: Margie Liberty on Jul 06, 2012 Comments:
383.	Name: Imogene Ayres on Jul 06, 2012 Comments: "The world is run by those who show up."
384.	Name: Anonymous on Jul 06, 2012 Comments:
385.	Name: Steven L. Scheye on Jul 06, 2012 Comments: Damn Facist bureaucrat pigs
386.	Name: Lynn H. Hiden on Jul 06, 2012 Comments:
387.	Name: Thomas Wackerman on Jul 06, 2012 Comments:
388.	Name: Patt Brown on Jul 06, 2012 Comments:

389.	Name: Ken Brown on Jul 06, 2012 Comments:	
390.	Name: Jeff Hanna on Jul 06, 2012 Comments:	
391.	Name: Carol T Singer on Jul 06, 2012 Comments:	
392.	Name: Carolyn McCain on Jul 06, 2012 Comments:	
393.	Name: Lani Watkins on Jul 06, 2012 Comments: ABAG and MTC are not my elected representatives and any EIR to transfer power to a NGO is not acceptable.	
394.	Name: Marjory Parker on Jul 06, 2012 Comments:	
395.	Name: Suzanne Silk on Jul 06, 2012 Comments: As a citizen of the Bay Area I demand a complete review and comments by citizens, not just bureaucrats and citizens on one side of the argument.	
396.	Name: Darlene Anastas on Jul 06, 2012 Comments: Please rethink this move to take away personal freedoms at a critical time when legislation such as this is becoming more intrusive than ever before. This is a poorly conceived idea and should not be implimented. Leave critical decisions in the hands of elected officials who answer to the voting public.	
397.	Name: FRANK MONTICELLI on Jul 06, 2012 Comments:	
398.	Name: Joyce Elaine Esakson on Jul 06, 2012 Comments:	
399.	Name: Susan Mueller on Jul 06, 2012 Comments:	
400.	Name: Anonymous on Jul 06, 2012 Comments:	
401.	Name: Andy And Kerry Patterson on Jul 06, 2012 Comments: Let's get out of personal lives and mind our own business. We are for leaving the Government alone, so we would like the Government to leave Us alone. One Bay Area Plan is astounding like Communism. We are free people not subjects to the Government.	
402.	Name: Randy L. Kyle on Jul 06, 2012 Comments: It is long past time to put both state and federal governments back in their box. Dismantle the eco-communist bureaucracy NOW.	
403.	Name: Randy L. Kyle on Jul 06, 2012 Comments: It is long past time to put both state and federal governments back in their box. Dismantle the eco-communist bureaucracy NOW.	
404.	Name: Linda Jumangit on Jul 07, 2012 Comments: Haste makes you an idiot. There is always time to make a mistake but never any time to correct it.	
405.	Name: Howard E. SWain on Jul 07, 2012 Comments: I cannont believe there are still people stupid enough to think man made global warming is a problem. There is tons of	

## evidence to prove the whole thing is a a fraudulent hoax.

406.	Name: Johanna Coble on Jul 07, 2012 Comments:
407.	Name: Garald Palazzi on Jul 07, 2012 Comments:
408.	Name: Deborah Kerwin-Peck on Jul 07, 2012 Comments:
409.	Name: Dwight Swobe on Jul 07, 2012 Comments:
410.	Name: DON CRADDUCK on Jul 07, 2012 Comments:
411.	Name: Ilene Meyers on Jul 07, 2012 Comments:
412.	Name: Ben Woods on Jul 07, 2012 Comments: One Bay Area Plan is a bad idea for everyone who has to pay for it, let alone live in it!
413.	Name: Gary Springer on Jul 07, 2012 Comments: abag & mtc hide in the shadows & the city officials are afraid to let there citizens know whats going & the consequences.
414.	Name: Eliot Chavez on Jul 07, 2012 Comments:
415.	Name: Michael Boworth on Jul 07, 2012 Comments:
416.	Name: Anonymous on Jul 07, 2012 Comments:
417.	Name: Anonymous on Jul 07, 2012 Comments:
418.	Name: Russ Greenlaw on Jul 07, 2012 Comments: MTC and ABAG, as unelected, unaccountable agencies have no business making policy or jamming any policy down the throats of the public. Only elected bodies have that authority. MTC and ABAG, as promoters of "One Bay Area" are acting as tyrants.
419.	Name: Pauline Zazulak on Jul 07, 2012 Comments:
420.	Name: Patricia Keylon on Jul 07, 2012 Comments:
421.	Name: Antoinette Reiser on Jul 07, 2012 Comments:
422.	Name: Michael McDermott on Jul 07, 2012

Comments: The draft EIR fails to address many critical issues, including highly questionable assumptions about population and economic growth.

423.	Name: Anonymous on Jul 07, 2012 Comments:
424.	Name: Beverly Hansen on Jul 07, 2012 Comments:
425.	Name: Doris Robinson on Jul 07, 2012 Comments: If I could sign this petition more than once I would sign it a million times. We the People need more time to show you the folly of this plan and for our voice to be heard.
426.	Name: Vernon Dale on Jul 07, 2012 Comments: I want a full EIR preparation and review cycle.
427.	Name: Jeffrey Hunter on Jul 07, 2012 Comments: Why don't you One World government busybodies move to Havana or Kabul?
428.	Name: Raymond Wiggerwiggerr@sbcglobal.net on Jul 07, 2012 Comments:
429.	Name: Anonymous on Jul 07, 2012 Comments: STOP AGENDA 21!!!!!! PERIOD!!!
430.	Name: Susan Mister on Jul 07, 2012 Comments:
431.	Name: William McGee on Jul 07, 2012 Comments:
432.	Name: Anonymous on Jul 07, 2012 Comments:
433.	Name: Larry Nelson on Jul 07, 2012 Comments:
434.	Name: Donna Rosemont on Jul 07, 2012 Comments: Please, please stop Plan Bat Area!!! Stop this power grab and intrusion into our lives!!
435.	Name: Debbie Gomez-Davis on Jul 07, 2012 Comments:
436.	Name: Gaylon Kastner on Jul 07, 2012 Comments: I am fighting against Agenda and have been for many yearsOrlean Koehle, was the first person that brought this to my attention
437.	Name: Paula H Kotzen on Jul 07, 2012 Comments:
438.	Name: Jerry Nunes on Jul 07, 2012 Comments: We therefore call upon ABAG and MTC to reject the draft EIR as incomplete and inadequate and to extend the time for public comment on the next draft. The issues involved are critically important and decisions must not be made in haste without adequate time for review. The review process must allow maximum latitude for citizens to voice their views on the Plan and to demand complete examination of the most likely outcomes from its adoption.

439.	Name: Ashtynne Montgomery	on Jul 07, 2012
	Comments:	

440.	Name: David Miller on Jul 07, 2012 Comments: One Bay Area Plan is flawed and must be scrapped. Leave control with the local governments.
441.	Name: Danny Calvert on Jul 07, 2012 Comments:
442.	Name: Anonymous on Jul 07, 2012 Comments:
443.	Name: Chris Calvert on Jul 07, 2012 Comments:
444.	Name: Joan Cook on Jul 07, 2012 Comments:
445.	Name: Marty Trout on Jul 07, 2012 Comments: Agenda 21 is the tool that communists are using to destroy America. The UN is controlled by Islamic and communist nations that hate America and Israel. Why do we pay 24% of their budget to destroy us?
446.	Name: Tracy Vogel on Jul 07, 2012 Comments: Local Gov. does not have the right to pass legislation that denies citizens rights and the right to be informed.
	Thank you! Tracy
447.	Name: William John Keast on Jul 07, 2012 Comments: Decisions such as land use must be made by elected officials, as they are directly held accountable by the electorate. This is still a republic and we cannot afford to hand over this type of decision-making power to bureaucrats with an agenda which may not be supported by a majority of the electorate.
	My right to own my own home, where I chose and where I can afford is still a sacred right under the Constitution of the United States of America. I do not wish to be told where or how I will live, especially by a group of unelected elitists who believe they know better than I do what is best for me.
448.	Name: Rose Haliewicz on Jul 07, 2012 Comments:
449.	Name: Susan B. Anthony on Jul 07, 2012 Comments: The citizens of Vallejo are being penalized by an aggressive citation regime, painting the curb red at the 'pick-up an extra person' in the commuter zone. I myself have received seven tickets in front of my home in the last year, all appealed by certified mail to no avail. The Vallejo Police ticket agency rarely acknowledges appeals and routinely doubles fines during the appeal process. Basicly I was blackmailed into paying \$200.for all the tickets to be dropped. What about the \$50.00 a day storage fee when they impound a vehicle, if the vehicle gets sold at auction for less than the storage bill, the old owner can be billed for the remaining exorbitant storage fees. Towing Companies should be regulated by the Public Utility Commission or the State Department for 'consumer protection.'
450.	Name: Mary Untiedt on Jul 07, 2012 Comments:
451.	Name: JANE BENSON-KEAST on Jul 07, 2012 Comments: This kind of hostage-taking must stop! NO- you CANNOT have my home, my liberty - OR - anything else!
452.	Name: JANE BENSON-KEAST on Jul 07, 2012 Comments: This kind of hostage-taking must stop! NO- you CANNOT have my home, my liberty - OR - anything else!
453.	Name: Jay Harvey on Jul 07, 2012 Comments:

454.	Name: Avon M. Wilson on Jul 07, 2012 Comments: The public has the right and MTC/ABAG have the responsibility to assure there is adequate time for a thorough EIR on the BAY AREA PLAN. Please extend the scoping time!	
455.	Name: Anonymous on Jul 07, 2012 Comments: This plan needs to be made widely public, since it affects us dearly. Extend deadline to months more and publicize!	
456.	Name: Selena Santa Cruz on Jul 07, 2012 Comments:	
457.	Name: Sharron D. Nuno on Jul 07, 2012 Comments: I support efforts to ensure full and complete review and comment by citizens of the Bay Area.	
458.	Name: Suzanne Rodriguez on Jul 07, 2012 Comments: Allow the public to vote on this.	
459.	Name: Lois Kleinkauf on Jul 07, 2012 Comments:	
460.	Name: Lois Kleinkauf on Jul 07, 2012 Comments:	
461.	Name: Marilyn Britton on Jul 07, 2012 Comments: More review is needed before any of this plan is implemented.	
462.	Name: Richard Codiga on Jul 08, 2012 Comments:	
463.	Name: Evelyn Nokelby on Jul 08, 2012 Comments: We do not want this at all. Local people should be able to decide how they want their own towns/cities set up. Most of all I want the Constitution followed to the max and that means personal property rights protected!	
464.	Name: Karen Ortega on Jul 08, 2012 Comments: Just another example of how dangerously easy it is to loose our individual rights and liberty. We will be vigilant.	
465.	Name: Anonymous on Jul 08, 2012 Comments:	
466.	Name: Bonnie Krupp on Jul 08, 2012 Comments:	
467.	Name: J.Eckroat on Jul 08, 2012 Comments:	
468.	Name: Lynnette Davis on Jul 08, 2012 Comments:	
469.	Name: Anonymous on Jul 08, 2012 Comments:	
470.	Name: Tracey Barber on Jul 08, 2012 Comments:	

471.	Name: John Gorden on Jul 08, 2012 Comments:
472.	Name: John Gorden on Jul 08, 2012 Comments:
473.	Name: Rex Evatt on Jul 08, 2012 Comments:
474.	Name: Anonymous on Jul 08, 2012 Comments:
475.	Name: Daniel Smith on Jul 08, 2012 Comments: Thankyou Frank Leo keep up the good work
476.	Name: Anonymous on Jul 08, 2012 Comments:
477.	Name: Anonymous on Jul 08, 2012 Comments:
478.	Name: Anonymous on Jul 08, 2012 Comments:
479.	Name: Steve Kemp on Jul 08, 2012 Comments: Stop this Green Monster. It's nothing more than a power grab by the puppeteers.
480.	Name: Jaxon Riley on Jul 08, 2012 Comments:
481.	Name: Evelyn Cozakos on Jul 08, 2012 Comments:
482.	Name: Joseph Parrish on Jul 08, 2012 Comments:
483.	Name: Pamela Johnston on Jul 08, 2012 Comments: We have to stop One Bay Area now!
484.	Name: Nancy Mulligan on Jul 08, 2012 Comments:
485.	Name: Charles Weidner on Jul 08, 2012 Comments:
486.	Name: Anonymous on Jul 08, 2012 Comments:
487.	Name: Anonymous on Jul 08, 2012 Comments: Private Property Rights Must be Preserved
488.	Name: Joan G. Caviness on Jul 08, 2012 Comments: Give the many people affected a voice. Don't ram your opinions through, before you have heard ours, the taxpayers!
489.	Name: Elaine O'Neill on Jul 09, 2012

489. Name: Elaine O'Neill on Jul 09, 2012

## Comments:

490.	Name: Randy Roldan on Jul 09, 2012 Comments: I want FREEDOM !!!	
491.	Name: Cheryl on Jul 09, 2012 Comments:	
492.	Name: Michael Nielsen on Jul 09, 2012 Comments: Mimi~ we have met and I have been trying to cfome help at the meetings along the lines you trained me last December up in Napa. Keep up the great work!	
493.	Name: Phillip Nishkian on Jul 09, 2012 Comments:	
494.	Name: Margot Reynolds on Jul 09, 2012 Comments:	
495.	Name: Ortrud Witt on Jul 09, 2012 Comments:	
496.	Name: Anonymous on Jul 09, 2012 Comments: I fully agree with the precepts of the petition. Thank you for the good work and strong effort.	
497.	Name: Harrison L Stockton on Jul 09, 2012 Comments:	
498.	Name: John Fry on Jul 09, 2012 Comments:	
499.	Name: Beverly Hansen on Jul 09, 2012 Comments:	
500.	Name: Art Muir on Jul 09, 2012 Comments: This plan is an agenda being rushed through way too quickly,against the people's wishes, with a purposeful effort to make it difficult for the voice of the people to be heard. Our government becomes increasingly tyrannical, efforts like this Plan must be resisted.	
501.	Name: Anonymous on Jul 09, 2012 Comments:	
502.	Name: Norman C. Miller on Jul 09, 2012 Comments: I can't wait to express my opinion about government steam rolling over my rights.	
503.	Name: Cynthia A. Corselli on Jul 09, 2012 Comments:	
504.	Name: Chris Stanley on Jul 09, 2012 Comments: Stop this fraud! We want "One FREE Bay Area"!	
505.	Name: David Oliver on Jul 09, 2012 Comments: It is not right to "Fast Track" anything of this importance. Give the people the right to respond.	
506.	Name: Anonymous on Jul 09, 2012 Comments:	

## 507. Name: Peter Fanucchi on Jul 09, 2012 Comments: If this is a good idea for Californians then the process should be highly public for everyone to see in prime time!

508.	Name: Ronald Turner on Jul 09, 2012 Comments:
509.	Name: Donna Morris on Jul 09, 2012 Comments: The ERI scoping process is incomplete & amp; inadequate, so I request that you extend the time for public comment on the next daft.
510.	Name: Margi Kangas on Jul 09, 2012 Comments:
511.	Name: Sally Bettencourt on Jul 09, 2012 Comments: It is time to stop the advancemnet of the loss of liberty and a "taking" of our lands. This process is unamerican and non-elected persons are forcing decisions onto the citizens. This must stop and our truly elected officials in each locality needs to stand up and rebel against this movement. If they don't, they need to be removed from office.
512.	Name: Bob Diehl on Jul 09, 2012 Comments: Go get 'em
513.	Name: Sharlene Barni on Jul 09, 2012 Comments: Go get 'em
514.	Name: Bruce Phillips on Jul 09, 2012 Comments: More time 'must' be available to review this comprehensive Bay Area Plan.
515.	Name: Vickie Lessi on Jul 09, 2012 Comments: What a travesty, and the suffocation of public comment is Marxist! Whenever unelected officials, agencies, politicians do the hide and rush tactic, it's is ALWAYS negative for the people. What have you got to hide?!
516.	Name: Mary Walker on Jul 09, 2012 Comments: I strongly object and resent the underhanded, sneaky, tyrannical transfer of power from elected officials to unelected regional bodies without the knowledge and voice of WE the people who will be affected by these massive takeover of our lives!!
517.	Name: Scott Robinson on Jul 09, 2012 Comments:
518.	Name: Frank Miranda on Jul 09, 2012 Comments:
519.	Name: Harold Mackenzie on Jul 09, 2012 Comments:
520.	Name: Anonymous on Jul 09, 2012 Comments:
521.	Name: Jeanette Tomblin on Jul 09, 2012 Comments: I want to sign petition. Stop Agenda 21 , Plan Bay Area etal
522.	Name: Jeanette Tomblin on Jul 09, 2012 Comments: I want to sign petition. Stop Agenda 21 , Plan Bay Area etal
523.	Name: Ellyn Loesch on Jul 09, 2012 Comments:

524.	Name: Jeanette Tomblin on Jul 09, 2012 Comments: I want to sign petition. Stop Agenda 21 , Plan Bay Area etal
525.	Name: Bob Loesch on Jul 09, 2012 Comments:
526.	Name: Winston JJones Jr. on Jul 09, 2012 Comments:
527.	Name: Jeanette Tomblin on Jul 09, 2012 Comments: I want to sign petition. Stop Agenda 21 , Plan Bay Area etal
528.	Name: Joe Tomblin on Jul 09, 2012 Comments: Joe Tomblin signs petition
529.	Name: Joe Tomblin on Jul 09, 2012 Comments: Joe Tomblin signs petition
530.	Name: Keith Riordan on Jul 09, 2012 Comments:
531.	Name: Jami Mitchell on Jul 09, 2012 Comments:
532.	Name: Helen Magneson on Jul 09, 2012 Comments:
533.	Name: Edward Lenz on Jul 09, 2012 Comments: Government should not tell me what kind of transportation I should take or drive.
534.	Name: JOHN HAAS on Jul 09, 2012 Comments:
535.	Name: DOROTHY HAAS on Jul 09, 2012 Comments:
536.	Name: Cynthia Riordan on Jul 09, 2012 Comments:
537.	Name: Brad Seifers on Jul 09, 2012 Comments:
538.	Name: Anonymous on Jul 09, 2012 Comments: The committee must know their tactics are unpopular with the public and common sense must prevail
539.	Name: Paul And Trudy Schmitt on Jul 09, 2012 Comments:
540.	Name: Anonymous on Jul 09, 2012 Comments:

541.	Name: Jeanine Hillebrandt on Jul 09, 2012 Comments:
542.	Name: Anonymous on Jul 09, 2012 Comments:
543.	Name: Anonymous on Jul 09, 2012 Comments:
544.	Name: Anonymous on Jul 09, 2012 Comments:
545.	Name: Margot Boteler on Jul 09, 2012 Comments:
546.	Name: Diane Prioleau on Jul 09, 2012 Comments:
547.	Name: Cindy Haas on Jul 09, 2012 Comments:
548.	Name: Jennifer M Cooper on Jul 09, 2012 Comments:
549.	Name: Anonymous on Jul 09, 2012 Comments:
550.	Name: Anonymous on Jul 09, 2012 Comments:
551.	Name: Mary Walker on Jul 09, 2012 Comments: thought had already signedand expressed my concerns at the underhanded deceitful manner in which our lives are being taken over by unelected people controllers pushing UN mandates without our input or vote!
552.	Name: Margaret A Eash on Jul 09, 2012 Comments: thank you for keeping us informed.
553.	Name: John G. Reynolds on Jul 09, 2012 Comments:
554.	Name: Robert And Dawn Horton on Jul 09, 2012 Comments: Do not regulate us out of our freedom to live as we chose. This will leave fewer choices of lifestyles putting the population in little boxes made of ticky-tacky. These boards are not even elected ,so where does the power come from. We should start a petition to have a proposition placed on the ballot to disband all these unelected regulatory boards.
555.	Name: Wickie Smith on Jul 09, 2012 Comments:
556.	Name: Anonymous on Jul 09, 2012 Comments:
557.	Name: Anonymous on Jul 09, 2012 Comments:
558.	Name: Joy Schoming on Jul 09, 2012 Comments:

559.	Name: Mary Ann Brautigan on Jul 09, 2012 Comments:
560.	Name: Anonymous on Jul 09, 2012 Comments:
561.	Name: Kathy Cravines on Jul 09, 2012 Comments:
562.	Name: Joanne Hottendorf on Jul 09, 2012 Comments: This is a mostly covert operation that citizens don't know about. Given the right to vote on " The Facts" of this plan, NO ONE WOULD VOTE FOR IT.
563.	Name: Joe Hernandez on Jul 09, 2012 Comments:
564.	Name: Rainey Olson on Jul 09, 2012 Comments: will u be speaking anywhere in the Santa Rosa area in the near future?
565.	Name: Gary Smukal on Jul 09, 2012 Comments:
566.	Name: Susan Albrecht on Jul 09, 2012 Comments:
567.	Name: Michael L. Martin on Jul 09, 2012 Comments:
568.	Name: Anonymous on Jul 09, 2012 Comments:
569.	Name: Anonymous on Jul 09, 2012 Comments:
570.	Name: Anonymous on Jul 09, 2012 Comments:
571.	Name: Mark Behrens on Jul 09, 2012 Comments: Property rights and personal freedoms were among the most crucial, fundamental principles upon which the United States was founded. I am not a property owner, yet I can see that Plan Bay Area is another step in the continued erosion of our liberties. It is not leadership or wise planning, but rather another example of a slow but sure slide into tyranny.
572.	Name: Michael Wilson on Jul 09, 2012 Comments:
573.	Name: Coley McBride on Jul 09, 2012 Comments: One Bay Area is an attack on private property and must be stopped. It is another discouraging example of the US government no longer understanding it's original tenance of being for the people. n
574.	Name: Susan Piedmont on Jul 09, 2012 Comments:
575.	Name: Bruce T Cowee on Jul 09, 2012 Comments:

576.	Name: SALVATORE GRAMMATICO on Jul 09, 2012 Comments: RETAINING LOCAL MANAGEMENT OF THE DEVELOPMENT OF OUR COMMUNITY IS PARAMOUNT IN OUR FORM OF GOVERNANCE
577.	Name: Anonymous on Jul 09, 2012 Comments:
578.	Name: Terry Steffen on Jul 09, 2012 Comments: I am against Plan Bay Area
579.	Name: Anonymous on Jul 09, 2012 Comments:
580.	Name: Nancy Martino on Jul 09, 2012 Comments:
581.	Name: Charla Benner on Jul 09, 2012 Comments: THIS MUST BE DEFEATED!
582.	Name: Anonymous on Jul 09, 2012 Comments: Stop the madness!
583.	Name: Anonymous on Jul 09, 2012 Comments:
584.	Name: Nathan McMahon on Jul 09, 2012 Comments: I totally reject this unconstitutional effort on the part of ABAG and MTC to nullify the right of every individual to be properly represented by constitutionally elected officials and to deny citizens the right to protest the actions of ABAG and MTC in this fraudulent, inadequate, incomplete, and totally transparent process designed to steal the freedoms and property rights of California residents and United States Citizens without any recourse to oppose it. Nathan McMahon, 16856 Armstrong Woods Road, Guerneville CA, 95446.
585.	Name: Ingrid Simkins on Jul 09, 2012 Comments:
586.	Name: Anonymous on Jul 09, 2012 Comments:
587.	Name: KENNETH R. COOK on Jul 09, 2012 Comments: your agenda is not my agenda,we do not think that people should be stacked on top of each other like cabreney greens in Chicago
588.	Name: Kimberley Ledwell on Jul 09, 2012 Comments:
589.	Name: Thomas F Turner on Jul 09, 2012 Comments: Stop trying to control my life. Fix the broken state
590.	Name: Anonymous on Jul 09, 2012 Comments:
591.	Name: Amy Chorney on Jul 09, 2012 Comments:
592.	Name: Jason Chorney on Jul 09, 2012 Comments:

593.	Name: Corrine Martin on Jul 09, 2012 Comments:
594.	Name: Casey Nesbit on Jul 09, 2012 Comments: The EIR is based on Flawed premes of agenda 21. You should not let the UN dictate how this state is run.
595.	Name: Lorraine Humes on Jul 09, 2012 Comments: I think my city council, San Pablo, is into getting money from the ABAG and will go along with sustainable development What can I do?
596.	Name: Robin Berwick on Jul 09, 2012 Comments:
597.	Name: BOB on Jul 09, 2012 Comments:
598.	Name: Glenda Kitchel on Jul 09, 2012 Comments: Stop Agenda 21 we do want it!
599.	Name: Anonymous on Jul 09, 2012 Comments:
600.	Name: Jan Soule on Jul 09, 2012 Comments:
601.	Name: G R Smith on Jul 09, 2012 Comments:
602.	Name: Margie Liberty on Jul 09, 2012 Comments:
603.	Name: Hal Mortimer on Jul 09, 2012 Comments:
604.	Name: Jesus Padilla on Jul 09, 2012 Comments:
605.	Name: Antonio on Jul 09, 2012 Comments:
606.	Name: Nancy Lee Liebscher on Jul 09, 2012 Comments: Why are our rights of no importance? Why are we subservient to false studies like global warming and sustainable development? Why? Why?
607.	Name: Robert Hauser on Jul 09, 2012 Comments: If there is one thing guaranteed to bring my blood to the boiling pointit is grossly oversalaried and unelected bureaucrat sleaze who, because they are academically pedigreed by some Ivy Plague egg farm or so called "liberal" diploma mill like UC Berserkeley or UCLA, fancy themselves qualified to dictate to us how to live our lives and what is best for the communities we've lived in for decades in many cases and that they have never even set foot in. This country reeks from here to the far end of Hell with self-bloating alphabet soup bureaucracies and this status needs to be dismantled with extreme prejudice in the name of what shambles and wreckage of Constitutional justice yet remains in our livesand ABAG/MTC are a superb place to begin ridding ourselves of parasites.
608.	Name: Christine Certo on Jul 09, 2012 Comments: How does that quote go? "The only thing necessary for the triumph of evil is for good men to do nothing."

Comments: How does that quote go? " The only thing necessary for the triumph of evil is for good men to do nothing. "

609.	Name: Glenn Steiding on Jul 09, 2012 Comments: Stop meddling in social engineering Man has been trying to alter our conditions since he started talking look where that has gotten us. You'll never achieve your goal there are forces working against you that make it impossible the indiscretions of mankind itself all the evil traits.
610.	Name: David Ericksob on Jul 09, 2012 Comments:
611.	Name: Louise Crawford on Jul 09, 2012 Comments: hope I did this right
612.	Name: Lee Ann Reuter on Jul 09, 2012 Comments:
613.	Name: Vera Sorum on Jul 09, 2012 Comments:
614.	Name: Gary Scheier on Jul 09, 2012 Comments:
615.	Name: Gene Enfantino on Jul 09, 2012 Comments:
616.	Name: Jeanette Mitchell on Jul 09, 2012 Comments:
617.	Name: Olivia Vicente on Jul 09, 2012 Comments:
618.	Name: Jack B. Ritter on Jul 09, 2012 Comments: It's far past time to slow or shut down run away government agencies with no accountability and rampant unintended consequences.
619.	Name: Bryan Draper on Jul 09, 2012 Comments:
620.	Name: Susan Bernard on Jul 09, 2012 Comments:
621.	Name: Anonymous on Jul 09, 2012 Comments:
622.	Name: Tashia M. Flucas on Jul 09, 2012 Comments:
623.	Name: Lynn Teger on Jul 09, 2012 Comments:
624.	Name: Clarence De Barrows on Jul 09, 2012 Comments: Comprehensive plans take precedence over and are, more often than not, insensitive to local concerns. Local governments concerns should take precedence over comprehensive planners authority grabs. You know, it's like the authority assigned to the States over the Federal government as defined in the Constitution.
625.	Name: Clarence De Barrows on Jul 09, 2012 Comments:

626.	Name: Elizabeth Manning on Jul 09, 2012 Comments: ABAG and MTC have commissioned an environmental impact report (EIR) on Plan Bay Area that is incomplete. Please help us maintain our liberty by becomming informed.
627.	Name: Cecily Barber on Jul 09, 2012 Comments: The people NEED to KNOW what all this plan entails, not just the feel-good slogans. This plan is setting up EXTRA GOVERNMENT LAYERS which will adopt guidelines without electable accountability!!
628.	Name: Joan Leone on Jul 09, 2012 Comments: STOP THIS LAND GRAB IMMEDIATELY
629.	Name: Elena Stahn on Jul 09, 2012 Comments:
630.	Name: Jesse Lindsey on Jul 09, 2012 Comments: Stop crony capitalist/fascist Agenda 21 in the Bay area along with the rest of the country!
631.	Name: Becky Kolberg on Jul 09, 2012 Comments:
632.	Name: John Novick on Jul 10, 2012 Comments:
633.	Name: Carol Gibson on Jul 10, 2012 Comments: I don't like the way the government has been reducing my say on the way I live by first ignoring me, and then just transferring the power to others who are NOT elected individuals!
634.	Name: Barbara Wanvig on Jul 10, 2012 Comments: I oppose Plan Bay Area for the reasons outlined in this petition.
635.	Name: Janet Feeley on Jul 10, 2012 Comments: In a free society you must have private property rights!!
636.	Name: Donald Cole on Jul 10, 2012 Comments: The proposed bill has been moved thorugh too quickly and needs more citizen imput.
637.	Name: Allen C Woolsey on Jul 10, 2012 Comments: I do not approve of the Plan Bay Area. As a resident, property owner and tax payer I oppose the transfering of development from our elected county planning officials to an unelected group of regional bodies.
638.	Name: Karen Westover on Jul 10, 2012 Comments:
639.	Name: Anonymous on Jul 10, 2012 Comments:
640.	Name: Anonymous on Jul 10, 2012 Comments:
641.	Name: Joe Mahoney on Jul 10, 2012 Comments:
642.	Name: Margaret Mahoney on Jul 10, 2012 Comments:
643.	Name: Doug Silveira on Jul 10, 2012

644.	Name: Olga Pellegrini on Jul 10, 2012 Comments: I am totally against PlanBayArea. This plan is not Constitutional and absolutely by passes the rights of the individual and property rights! I want to have a choice as to where I live and don't want to be mandated by unelected officials/.
645.	Name: Terry Gossett on Jul 10, 2012 Comments:
646.	Name: Jeanne Decker on Jul 10, 2012 Comments:
647.	Name: Anonymous on Jul 10, 2012 Comments:
648.	Name: Pamela McCart on Jul 10, 2012 Comments:
649.	Name: Anonymous on Jul 10, 2012 Comments:
650.	Name: Johnette Pfingstenten on Jul 10, 2012 Comments: enough already with the continuous erosion of our freedoms
651.	Name: Judy Fawcett on Jul 10, 2012 Comments: this is so wrong, people do not know what is happening. we are all too busy trying to keep above water.
652.	Name: Paul Cardaropoli on Jul 10, 2012 Comments: How much more are we going to let them take from us, before we act?
653.	Name: Neil Mammen on Jul 10, 2012 Comments:
654.	Name: Jennifer Fisher on Jul 10, 2012 Comments:
655.	Name: Anonymous on Jul 10, 2012 Comments:
656.	Name: Anonymous on Jul 10, 2012 Comments:
657.	Name: Anonymous on Jul 10, 2012 Comments: America, land of the free. Leave it that way.
658.	Name: Mark Jeghers on Jul 10, 2012 Comments: DO NOT SPAM ME. No emails of ANY kind.
659.	Name: Anonymous on Jul 10, 2012 Comments:
660.	Name: Susan Hart on Jul 10, 2012 Comments:
661.	Name: Lois Dogey on Jul 10, 2012

Comments:

662.	Name: Scott Saftler on Jul 10, 2012 Comments:
663.	Name: Guillermo Ferreti on Jul 10, 2012 Comments: Dont want to live in a high density location. I want freedom
664.	Name: Dave Bartle on Jul 10, 2012 Comments:
665.	Name: Nicholas Brown on Jul 10, 2012 Comments:
666.	Name: Anonymous on Jul 10, 2012 Comments:
667.	Name: De Martini, Steven on Jul 10, 2012 Comments: Human behavior modification through regulation is short term, long term it will cause rebellion/revolt. Education and freedom is the only best path to take.
668.	Name: Willard Solymanbeyk on Jul 10, 2012 Comments:
669.	Name: Lynn Hofland on Jul 10, 2012 Comments:
670.	Name: Judith Buffington on Jul 10, 2012 Comments:
671.	Name: Lynn Hofland on Jul 10, 2012 Comments:
672.	Name: Cathleen Storm on Jul 10, 2012 Comments: I am completely against this awful plan. It is a terrible threat to the freedom of our way of life.
673.	Name: Diane Lynn Johnson on Jul 10, 2012 Comments:
674.	Name: Gary Kinsman on Jul 10, 2012 Comments: Pleasanton, CA
675.	Name: Lynda Kinsman on Jul 10, 2012 Comments: Pleasanton, CA
676.	Name: Phyllis Worth on Jul 10, 2012 Comments:
677.	Name: Jim Carr on Jul 10, 2012 Comments: This project has such huge ramifications to the citizens of California. The local meeting was not publicized properly, a "leader" speaking on behalf fo the program said it did not have to be properly noticed In all my years in the public sector, any project impacting the well being of the community, by law, must be properly noticed with meetings held at convenient times for the public.
678.	Name: Michael Shadwick on Jul 10, 2012

678. Name: Michael Shadwick on Jul 10, 2012

Comments: Please do not rush through this EIR without a PROPER time period for public comment. I personally do not wish to live

in a high density "transit" zone. I have a bicycle which i ride regularly. I have no desire to be told when I should and shouldn't be able to ride it. The same would be true with my pickup truck. I do not wish to have my personal sovereignty impinged by someone else's idea of how i should live my life. As a business owner, i am already deluged with regulations and restrictions, thus curtailing my ability to hire more employees and expand my business. Don't make it any tougher.

679. Name: David Eugene Way on Jul 10, 2012 Comments: NOT for the plan.DO NOT transfer the power to UNELECTED officials. do not bypass EIR!!! 680. Name: Alice McKeon on Jul 10, 2012 Comments: Thank you for the petition. We must stop the destruction of our liberties. 681. on Jul 10, 2012 Name: Anonymous Comments: Name: Annie Simpson 682. on Jul 10, 2012 Comments: I am very much against the fast tracking of Plan Bay Area as presently being aggressively fast forwarded. This proposal needs to be throughly understood by the citizens and how it will affect themselves personally and as families. 683. Name: Herb Drake on Jul 10, 2012 Comments: 684. Name: Henry E. Lawrence on Jul 10, 2012 Comments: ABAG is the local version of Agenda 21 685. Name: Larry Ray on Jul 10, 2012 Comments: we need to stop this !!!! 686. Name: Charles T Dunkle on Jul 10, 2012 Comments: Name: Emily Sabatka on Jul 10, 2012 687. Comments: Keep liberty alive! 688. Name: Nancy Barlas on Jul 10, 2012 Comments: enough with this socialist mentality. this is americas and we can live and drive where and when we wish......if you truly believe CO2 is a poisionous, dangerous gas.....please save the world and hold your breath! 689. Name: Richard Warsinger on Jul 10, 2012 Comments: 690. Name: Ken Whelan on Jul 10, 2012 Comments: keep government off our backs. Ken 691. Name: Miles Conway on Jul 10, 2012 Comments: 692. Name: Donald Guerrero on Jul 10, 2012 Comments: 693. Name: Tracy Selge on Jul 10, 2012 Comments: I do not recall the last time I attended a City Council meeting (yes, I sometimes attend) that a private company had the option to " fast track" a project. It is time that the gov. follows the same rules and processes it has is imposed on everyone else. "Community" is constantly being touted, yet when the community shows up, wanting to get involved and have apart in the process, they are shut out. I call on ABAG anb MTC to extend the time for public comment. In doing so, they will show that they value the processes they have put in place, but more importantly support the idea of "We the People".

694. Name: Robert Klingner on Jul 10, 2012

Comments: I call upon ABAG and MTC to reject the EIR scoping process as incomplete and inadequate . I call upon ABAG and MTC to extend the time for public comment on the next draft.

695.	Name: Anonymous on Jul 10, 2012 Comments: SF
696.	Name: Robert Klingner on Jul 10, 2012 Comments: I call upon ABAG and MTC to reject the EIR scoping process as incomplete and inadequate. I call upon ABAG and MTC to extend the time for public comment on the next draft.
697.	Name: Cynthia M Plencner on Jul 10, 2012 Comments:
698.	Name: Jean Abadie on Jul 10, 2012 Comments: Property rights need to be expanded and government regulations and controls need to be significantly restricted.
699.	Name: Mike Purtell on Jul 10, 2012 Comments:
700.	Name: Michael Crivello on Jul 10, 2012 Comments:
701.	Name: Hallie Bigliardi on Jul 10, 2012 Comments:
702.	Name: Robert Schooley on Jul 10, 2012 Comments:
703.	Name: Edward F. Johnson on Jul 10, 2012 Comments:
704.	Name: Susan Knoll on Jul 10, 2012 Comments: STAY OUT OF OUR LIVES!
705.	Name: James Modrall on Jul 10, 2012 Comments:
706.	Name: Anonymous on Jul 10, 2012 Comments:
707.	Name: Anonymous on Jul 10, 2012 Comments:
708.	Name: Arthur R. Perez on Jul 10, 2012 Comments:
709.	Name: Larry M. Kitchel on Jul 10, 2012 Comments: "Freedom"
710.	Name: John Marino on Jul 10, 2012 Comments: I regret that our elected officials are trying to pass legislation that is contrary to what many would expect and only find out after laws are passed. I hope this is struct down.

711. Name: Elizabeth McCarthy on Jul 10, 2012 Comments: Let us remember the men and women who over the years have sacrificed their lives so that we could live in the freedom of the Constitution..life, liberty and the pursuit of happiness. We are not to be governed by unelected bodies..this is a form of tyranny.

712.	Name: Chris Decker on Jul 10, 2012 Comments: Leave me to make my own choices. I do not need or want the government to make them for me
713.	Name: Sharon Muzio on Jul 10, 2012 Comments:
714.	Name: Doug Pratt on Jul 10, 2012 Comments:
715.	Name: Doug Pratt on Jul 10, 2012 Comments:
716.	Name: LINDA SANTI on Jul 10, 2012 Comments: These eco-terrorists will never get away with any of this. We will fight.
717.	Name: Anonymous on Jul 10, 2012 Comments: I want LIBERTY, not ECO-TYRANNY. I do not want ANY restrictions on my personal lifestyle choices, including where I live, how I travel, and my cost of living. Your Plan transfers authority for the most critical public policy issues – land use, transportation, and housing – from elected local officials to unelected bureaucrats. It will also impose billions of dollars of unfunded expenses on local communities that are already facing huge budget deficits. Start listening to the citizens and stop your socialistic behaviors!
718.	Name: Sandy And Fred Mangold on Jul 10, 2012 Comments: For years I have heard these community destroying ideas floated by arrogant politicians who would not be impacted by the havoc their misguided ideas would create. Using imagined global warming as cover they propose to radically alter the way most freedom loving people want to live. A proposed low income project in my city stirred anger in the hearts of mostly apathetic citizens and nearly caused a riot. That is what you face when folks wake up to the nightmare your plan would create. Sandy Mangold Millbrae Ca
719.	Name: Anonymous on Jul 10, 2012 Comments:
720.	Name: Anonymous on Jul 10, 2012 Comments:
721.	Name: Ray Calvello on Jul 10, 2012 Comments:
722.	Name: Rosanna Valentini on Jul 10, 2012 Comments: I reject the plan EIR that ABAG and MTC have adopted
723.	Name: Brandon Pace on Jul 10, 2012 Comments: Stop the bureaucratic takeover of our freedom!
724.	Name: Andrea Casino on Jul 10, 2012 Comments: Thank you for this petition. I just now heard about it and will get the word out on my facebook.
725.	Name: Ciark Darrah on Jul 10, 2012 Comments: I am fifth generation Californian, and also come from a military family. The battle for freedom has come to us, because the people we continually put in office to protect our constitutional rights betray us for there selfish greed. But now it's worse, our "leaders" have been tempted by liesof the Comunists and the dictatores of the United Nations. We must stand against this tyrany NOW!
726.	Name: Andrea Ramos on Jul 10, 2012 Comments:

Page 45 of 63

727.	Name: W. Patricia Clarke on Jul 10, 2012 Comments:	
728.	Name: Brent Cook on Jul 10, 2012 Comments:	
729.	Name: Charles D. Harding on Jul 10, 2012 Comments:	
730.	Name: Rhena Hendricks on Jul 10, 2012 Comments:	
731.	Name: Alan Wright on Jul 10, 2012 Comments:	
732.	Name: Christopher Luemgo on Jul 10, 2012 Comments:	
733.	Name: Anonymous on Jul 10, 2012 Comments: I think more access for regular people to give opinions on these sweeping plans is very important	
734.	Name: Christopher Luengo on Jul 10, 2012 Comments:	
735.	Name: Debbie Sly on Jul 10, 2012 Comments: We, the public are against the One Bay Area Plan stop this insanity now!	
736.	Name: Clifford Luengo on Jul 10, 2012 Comments:	
737.	Name: Joseph Blackwell on Jul 10, 2012 Comments:	
738.	Name: Robert Foss on Jul 10, 2012 Comments: Stop trying to tell us how to live!	
739.	Name: Larry Nemetz on Jul 10, 2012 Comments: Let freedom ring!	
740.	Name: Thomas Hoog on Jul 10, 2012 Comments: More time is needed for comment!	
741.	Name: Rick Luck on Jul 10, 2012 Comments:	
742.	Name: Todd Davies on Jul 10, 2012 Comments:	
743.	Name: Alan Anderson on Jul 10, 2012 Comments:	
744.	Name: Kevin McClure on Jul 10, 2012 Comments: No changes in the peoples private property rights should be allowed without the peoples vote.	

745.	Name: Julie Alexander on Jul 10, 2012 Comments:	
746.	Name: Lisa Luengo on Jul 10, 2012 Comments:	
747.	Name: Rose Bishop on Jul 10, 2012 Comments:	
748.	Name: Thom Steinmetz on Jul 10, 2012 Comments:	
749.	Name: Jean Kalvig on Jul 10, 2012 Comments: We are losing our freedoms a little at a time and this is just taking more of our rights to live in America as a free people.	
750.	Name: Steven Traversari on Jul 10, 2012 Comments:	
751.	Name: Margaret Murguia on Jul 10, 2012 Comments:	
752.	Name: Patricia Jones on Jul 10, 2012 Comments:	
753.	Name: Anonymous on Jul 10, 2012 Comments:	
754.	Name: Lance Ruttledge on Jul 10, 2012 Comments:	
755.	Name: David Boragno on Jul 10, 2012 Comments:	
756.	Name: Susanne Wagner on Jul 10, 2012 Comments: PLEASE STOP THE SOCIALIZING AND THE U.N. TAKE-OVER OF A ONCE FREE AMERICA. THE USA MUST REMAIN A FREE COUNTRY - ONE BAY AREA IS NOT PROMOTING FREEDOM OR LIBERTY AND MUST STOP.	
757.	Name: BILL SLY on Jul 10, 2012 Comments: We do not want the marxist One Bay Area plan.	
758.	Name: James T. Gibbons on Jul 10, 2012 Comments:	
759.	Name: James T. Gibbons on Jul 10, 2012 Comments:	
760.	Name: Greg Walker on Jul 10, 2012 Comments:	
761.	Name: Anonymous on Jul 10, 2012 Comments:	
762.	Name: Ken Soult on Jul 10, 2012 Comments: Keep up the good work! Heard about this on KSFO	

763.	Name: Anonymous on Jul 10, 2012 Comments:	
764.	Name: ROBERT SEVERIN on Jul 10, 2012 Comments: This is totally unnecessary!	
765.	Name: Alan McIntyre on Jul 10, 2012 Comments: everybody needs to know befor any vote takes place!!!	
766.	Name: Anonymous on Jul 10, 2012 Comments:	
767.	Name: Anonymous on Jul 10, 2012 Comments:	
768.	Name: Nicole Lynn on Jul 10, 2012 Comments:	
769.	Name: Raina Cordich on Jul 10, 2012 Comments:	
770.	Name: Susan Bingham on Jul 10, 2012 Comments: The public has not been given facts, has not had time to comment, and has not been allowed to ask questions at the meetings that have been held. If this is so great, why is it being rushed ahead before the public knows what's happening?	
771.	Name: Anonymous on Jul 10, 2012 Comments:	
772.	Name: Anonymous on Jul 10, 2012 Comments: stop agenda 21 NOW.	
773.	Name: Barry Flowers on Jul 10, 2012 Comments: Stop the government from crontolling our very existance, FREEDOM.	
774.	Name: Anonymous on Jul 10, 2012 Comments:	
775.	Name: Suzanne Viscovich on Jul 10, 2012 Comments:	
776.	Name: Alex Arcady on Jul 10, 2012 Comments:	
777.	Name: Anonymous on Jul 10, 2012 Comments:	
778.	Name: Anonymous on Jul 10, 2012 Comments: More time is needed to effect the changes that are sought. The people who are affected need to be in the decision-making process. Issues that are given the "bum's-rush" cause more problems than they "solve." As a home owner in San Mateo and Hayward, I want more time to examine this proposed change.	
	Sincerely, M. Beavins	
779.	Name: Linda Hoffman on Jul 10, 2012 Comments: We want liberty not Ecotyranny!	

780.	Name: Lauren Newington on Jul 10, 2012 Comments: Keep government out of our everyday lives!
781.	Name: Scott Gaynos on Jul 10, 2012 Comments:
782.	Name: Keith Adams on Jul 10, 2012 Comments:
783.	Name: Anonymous on Jul 10, 2012 Comments: Please reject the EIR scoping process for control of individual property rights. This process is incomplete and inadequate for the rights of all citizens.
784.	Name: Adrian DiLena on Jul 10, 2012 Comments:
785.	Name: Warren Gammeter on Jul 10, 2012 Comments: We don't want Agenda 21!
786.	Name: Richard Bessey on Jul 10, 2012 Comments:
787.	Name: Scott DuBridge on Jul 10, 2012 Comments:
788.	Name: Anonymous on Jul 10, 2012 Comments:
789.	Name: Margaret Stockton on Jul 10, 2012 Comments:
790.	Name: Daniel Gallen on Jul 10, 2012 Comments:
791.	Name: Anonymous on Jul 10, 2012 Comments: No more of the runaway marxist communist agenda being rammed through by sanctimonious liberal elitists.
792.	Name: ELEANOR MAGGIORA on Jul 10, 2012 Comments:
793.	Name: Robert Stockron on Jul 10, 2012 Comments:
794.	Name: Anonymous on Jul 10, 2012 Comments:
795.	Name: Aaron DeLaO on Jul 10, 2012 Comments: This should not happen without the consent of the people.
796.	Name: John Hertzer on Jul 10, 2012 Comments: stop thi s nonsense
797.	Name: Gregory Carstensen on Jul 10, 2012 Comments:

798.	Name: Jeanette Tomblin on Jul 10, 2012 Comments: sign petition to stop Agenda 21 etal
799.	Name: Larry Bogel on Jul 10, 2012 Comments:
800.	Name: Dolores Coester on Jul 10, 2012 Comments: This is just crazy.
801.	Name: David DiDonato on Jul 10, 2012 Comments: These people have gone too far. Wilderness Nation lives
802.	Name: Anonymous on Jul 10, 2012 Comments:
803.	Name: David DiDonato on Jul 10, 2012 Comments: These people have gone too far. Wilderness Nation lives
804.	Name: Moises Rivas on Jul 10, 2012 Comments:
805.	Name: Anonymous on Jul 10, 2012 Comments:
806.	Name: MARK MAIORANA on Jul 10, 2012 Comments: STOP AGENDA 21!
807.	Name: Jeremy Freeman on Jul 10, 2012 Comments: This is America, not communist Russia or China. Imposing laws that remove the rights of the people for "the greater good" is tyranny! Stop trying to take away our rights!
808.	Name: John Hyatt on Jul 10, 2012 Comments:
809.	Name: Christy Jacobs on Jul 10, 2012 Comments:
810.	Name: Jeffrey Polder on Jul 10, 2012 Comments: Bad Bad government.
811.	Name: Ken Mitchell on Jul 10, 2012 Comments: This leftist scheme has all the earmarks of a giant gulag. It'll be like living in some-third world slum. Forget it! Go out and find a useful job.
812.	Name: Robert Von Schwab on Jul 10, 2012 Comments: I belong to machinist district 190. I talk with my numerous brothers and they agree that this plan MUST be stopped.
813.	Name: PEG RUCKER on Jul 10, 2012 Comments: THIS IS A FREEDOM KILLER. STACKED HOUSING IS NOT WHAT WE NEED FOR THE FUTURE OF THIS COUNTRY.
814.	Name: Ed Manning on Jul 10, 2012 Comments: Agenda 21 is un-American!
815.	Name: Anonymous on Jul 10, 2012 Comments:

816.	Name: Michael J Piccardo on Jul 10, 2012 Comments: I don't want decisions about how I live made by unelected bureaucrats. All decisions on "One Bay Area" need to be approved by a vote of the people.	
817.	Name: Charles Adams on Jul 10, 2012 Comments:	
818.	Name: Ray And Maralyn Killorn on Jul 10, 2012 Comments:	
819.	Name: Maralyn Angeline (Dover) Killorn on Jul 10, 2012 Comments:	
820.	Name: Stephen R. Golub on Jul 10, 2012 Comments:	
821.	Name: John Roderick on Jul 10, 2012 Comments: I am against the power grab by elected local officials.	
822.	Name: Jane Jackson on Jul 10, 2012 Comments: Outrageous	
823.	Name: Anonymous on Jul 10, 2012 Comments: A loss of Constitutional freedom(s) is not America!	
824.	Name: Dan Hartman on Jul 10, 2012 Comments:	
825.	Name: Dawn Parent on Jul 10, 2012 Comments: Property rights & liberty are connected, they must be preserved against govt controls	
826.	Name: Cesar Simon on Jul 10, 2012 Comments:	
827.	Name: Celia J. Brown on Jul 10, 2012 Comments: Everyone I know is against this very offensive power grab. The citizens should vote on this! You are wrong to force it upon our peaceful communities.	
828.	Name: Thomas Murchie on Jul 10, 2012 Comments: This is nothing short of open communism. The UN has never achieved a single intended goal, including goals that are purported to advance the human condition. It is nothing more than a collection of racist, communists, anarchists, bureaucrats, and worse. "Anyone" pushing their agenda is seriously uniformed and totally lacking the ability to think critically. God save us	
829.	Name: Mark L. Mitchell, Esq. on Jul 10, 2012 Comments:	
830.	Name: Lori Jenkins on Jul 10, 2012 Comments: I can hardly recognize this state, I feel as if I've moved to the Soviet Union instead of the California. Our rights have been trampled, we need to change the people running this state to bring sanity back to our state.	
831.	Name: Roark Barraclough on Jul 10, 2012 Comments:	
832.	Name: Jon Wilson on Jul 10, 2012 Comments: Ten years ago I participated in an early version of the "Plan Bay Area" under the guise of a	

"Transportation Hub." It was clear to me then, as now, that plans like this (1) restrict ownership of private property, (2) restrict the movement of goods, services and emergency services, (3) never consider how issues of power, sewer and water shall be impacted, and mostly in a negative way. Overall, such a plan can violate US Constitution, Article 1, Sec. 9 by restricting personal movement! This entire effort is backdoor and should be voted on!

- 833. Name: Kristin Konvolinka on Jul 10, 2012 Comments:
- 834. Name: Marilyn Koenig on Jul 10, 2012 Comments: Don't fence me in! No planned ghettos!

835. Name: Olga P Pellegrini on Jul 10, 2012 Comments: The PlanBayArea has not been put up to a vote by the citizens of the Bay area. It should be voted on by every county that you're trying to lump together in a region!

No only I find it unconstitutional, but also it hurts the environment and poor people you claim you are trying to help! by giving waivers to big developers and creating a high concentration of pollution in urban areas!

- 836. Name: Dino Fry on Jul 10, 2012 Comments: lets stop those comunists
- 837. Name: Allen Shriver on Jul 10, 2012 Comments:
- 838. Name: Sharon Dashner on Jul 10, 2012 Comments:
- 839. Name: Lloyd Dashner on Jul 10, 2012 Comments:
- 840. Name: John Aitken on Jul 10, 2012 Comments:
- 841. Name: Dale on Jul 10, 2012 Comments:
- 842. Name: Elizabeth Biagini on Jul 10, 2012 Comments:
- 843. Name: Theresa Carlomagno on Jul 10, 2012 Comments:
- 844. Name: Connie Cipperly on Jul 10, 2012 Comments:
- 845. Name: Tom Mercurio on Jul 10, 2012 Comments:
- 846. Name: Dina Wilson on Jul 10, 2012 Comments:
- 847. Name: Anonymous on Jul 10, 2012 Comments:

848. Name: Anonymous on Jul 10, 2012

Comments: The Bay Area cannot sustain anymore fees or taxes imposed by politicians and unelected bureaucrats. The Bay Area does not want to hand over their property rights or transform the way we live and travel.

849.	Name: E Robert Ronning on Jul 10, 2012 Comments: NO ONE BAY PLAN!!!!!	
850.	Name: Bonnie Holt on Jul 10, 2012 Comments:	
851.	Name: Sally Plaisted on Jul 10, 2012 Comments:	
852.	Name: Julian Fraser on Jul 10, 2012 Comments: I do not want these Socialist telling me where I should live.	
853.	Name: John Woodman on Jul 10, 2012 Comments:	
854.	Name: Dale McKenna on Jul 10, 2012 Comments: Please leave us alone. We work hard to have the freedom to choose where we live, how we live and to enjoy the pride and ownership of private property. Please go work on your own garden.	
855.	Name: Frank Wise on Jul 10, 2012 Comments:	
856.	Name: Diana Nagy on Jul 10, 2012 Comments: NO to One Bay Area!!	
857.	Name: Anonymous on Jul 10, 2012 Comments:	
858.	Name: Al Merchant on Jul 10, 2012 Comments:	
859.	Name: Anonymous on Jul 10, 2012 Comments:	
860.	Name: Stephen Makin on Jul 10, 2012 Comments: I was never given the opportunity to vote for this social engineering crap, but I DO vote for elective office Put this on hold.	
861.	Name: Sandra Robison on Jul 10, 2012 Comments:	
862.	Name: Peter Moale on Jul 10, 2012 Comments: "Be afraid, be very very afraid", of these people who want to do this ! I will tell you this, it will NOT be in YOUR best interest !!!	
863.	Name: Rod Gippetti on Jul 10, 2012 Comments:	
864.	Name: Molly Morgan Clough on Jul 10, 2012 Comments: I don't think the general public understands how serious the effects of this groups ability to completely change our communities and adverse; ly control our property rights.	
865.	Name: Richard D Watts on Jul 10, 2012 Comments: Totally against this approach and the methods used by the MTC and ABAG!	

866.	Name: Roderick Perez on Jul 10, 2012 Comments:	
867.	Name: Ann Marie Ryan on Jul 10, 2012 Comments:	
868.	Name: James E. Hirsch on Jul 10, 2012 Comments: I'm a 3rd generation San Francisco native. 100% opposed to the ABAG and MTC Plan. Bless Mimi Steel for bringing this matter to my attention	
869.	Name: Vernon Dale on Jul 10, 2012 Comments: This hsould take as long as it took to fix the BAy Bridsge earthquake repair EIR.	
870.	Name: FRANK MONTICELLI on Jul 10, 2012 Comments:	
871.	Name: Edward Powell on Jul 10, 2012 Comments: You know what you can do with these unelected bureaucrats It's bad enough that we have to deal with the elected ones.Just the thought of the yahoos gives me a very sharp pain that makes it difficult to sit.	
872.	Name: Sean Nissen on Jul 10, 2012 Comments:	
873.	Name: Anonymous on Jul 10, 2012 Comments: I am completely against One Bay Area, wealth seizure, and domicile confiscation to force relocation into high-density housing. ABAG is over-reaching, and must be stopped.	
874.	Name: Sheila Nielsen on Jul 10, 2012 Comments: We live in America! Not a communist dictatorship! We own our propertynot the U.N. (agenda 21) Stand up Americanow!! Why votewhen some un-elected liberals can dictate the use of our land?whether we like it or not!	
875.	Name: Anonymous on Jul 10, 2012 Comments: I and my wife oppose One Bay Area, seizure of wealth, and forced relocation into high-density housing. ABAG has no rights under the US Constitution to perform any such Marxist attempts to rob us, and therefore must be made to hear opposing viewpoints and halt any further plans for One Bay Area.	
876.	Name: Mike Williams on Jul 10, 2012 Comments:	
877.	Name: Karl Rieden on Jul 10, 2012 Comments:	
878.	Name: Anonymous on Jul 10, 2012 Comments:	
879.	Name: Anonymous on Jul 10, 2012 Comments:	
880.	Name: Christine Sargent on Jul 10, 2012 Comments: Stop Agenda 12 Stop control of our property rights.	
881.	Name: Janet Kirtlink on Jul 10, 2012 Comments:	

883.	. Name: Olive L. Robinson on Jul 10, 2012 Comments: I feel this plan has not been sufficiently studied and many facts are incorrect. Please do not implement.	
884.	Name: De Orick on Jul 10, 2012 Comments:	
885.	Name: Robert Miller on Jul 10, 2012 Comments: I live in Millbrae. I see already how the "stack-and-pack" housing is effecting Millbrae, as it take me about as long to drive through Millbrae on El-Camino Real and onto the Millbrae Ave. Overpass as it takes me to drive from Millbrae Ave. to Belmont.	
	I am outraged at the behavior of a bunch of unelected bureucrats who think they know best and refuse to listed to opposing view points to a "One Bay Area" plan. Each county, and even each city is differedt, and you can't make a one size fits all policy for everyone.	
	We, the people, are in charge, not a bunch of know-it-all politicans.	
	Extend the time for public debate. This is a constitutional Republic, not a Dictatorship. Those who want to take buses and trains already do that. Those of us who must drive to get to work can not, and will not convert over. If I go into down town San Francisco, I take BART, but when I work (in construction) I can't take public transportation. I mean, come on, GET REAL!	
886.	Name: Debra Giles on Jul 10, 2012 Comments: Enough of 'others' telling me what is best!	
887.	Name: Mary Rasmussen on Jul 10, 2012 Comments: It is very important that an extension be grantedthis is a very important issue, and all sides should be heard!!!	
888.	Name: LORI SWEET on Jul 10, 2012 Comments: It is my wish that this entire Plan Bay Area plan be HALTED.	
889.	Name: Dottie Delmar on Jul 10, 2012 Comments: I'm for Option #1 - No Project as per Plan Bay Area Notice of Preparation. There's no justification for inadequate and incomplete forecasting. The impact this plan would have on my city and others would be catastrophic. The citizens expect representatives to represent them open and honestly.	
890.	Name: Mary Rasmussen on Jul 10, 2012 Comments: These issues should not be "passed off" to "regional bodies"they should remain under the control of local elected officialsPERIOD!!!	
891.	Name: Vera Sorum on Jul 10, 2012 Comments:	
892.	Name: Jack Gray on Jul 10, 2012 Comments: The draft action plans which have not been independently reviewed for accuracy or adequacy and should not be used for regional planning.	
893.	Name: Donna Menche on Jul 10, 2012 Comments: I don't care to live like the population does in North Korea nor any Socialist country. I am for the freedoms identified in the U.S. Constitution interpreted as they were written. Our constitution has been around since 1776 and has done quite well, thank you, and I want to keep in that way. If the proponents of this think this is a good idea, I suggest they fly quickly to another country that suits their fancy and leave us alone. I am certain there are many elsewhere who would gladly trade places with you.	
894.	Name: Rob Barelli on Jul 10, 2012 Comments:	

896.	Name: David Ward on Jul 10, 2012 Comments: No more agenda 21 BS.
897.	Name: Prudence Silger on Jul 10, 2012 Comments: you over-reach, in these kinds of plan. Once, the governor USED to believe that "small is beautiful". That applies to the size of government.
898.	Name: Anonymous on Jul 10, 2012 Comments:
899.	Name: Peter Wiebens on Jul 10, 2012 Comments:
900.	Name: Ashley Leach on Jul 10, 2012 Comments: We are oposed to agenda 21 and Any out side influence over the United States. You politicians who go along with this despotic use of authority Will be voted out of office and you can count on it
901.	Name: Stuart Depper on Jul 10, 2012 Comments: I am AGAINST this plan of ABAG and want my against vote known.
902.	Name: Steven Depper on Jul 10, 2012 Comments: I am against UN Agenda and ABAG's implementation of that idea here in California.
903.	Name: Ellen Donnelly on Jul 10, 2012 Comments: Changes of this magnitude need to be communicated by each municipality affected in a written mailing to each address in same. This should be followed by community forums on the issue. The final step is placing the matter on the ballots of each entitiy in a general election. The people have a right to vote on this, not have it pushed through by a panel of appointees. It has serious consequences to the population,.
904.	Name: Van Depper on Jul 10, 2012 Comments: I no want you at ABAG to do this to Vietnamese immigrants here.
905.	Name: Amyer Sayed on Jul 10, 2012 Comments: As a Muslim immigrant I am sure that this not good for my newly adopted country and am against this concept.
906.	Name: Bill Schilz on Jul 10, 2012 Comments:
907.	Name: Anonymous on Jul 10, 2012 Comments:
908.	Name: Stephen C England on Jul 10, 2012 Comments: Extend the deadline on One Bay Area EIR
909.	Name: Anonymous on Jul 10, 2012 Comments:
910.	Name: Elaine Schiff on Jul 10, 2012 Comments: every day we lose more and more of our rightsenough
911.	Name: Irene Tiburcio on Jul 11, 2012 Comments:

912.	Name: Brenda J Spinola	on Jul 11, 2012
	Comments:	

- 913. Name: Anka Deruysscher on Jul 11, 2012 Comments:
  - 914. Name: Kelly Oquendo on Jul 11, 2012 Comments:

915. Name: Anonymous on Jul 11, 2012 Comments:

### 916. Name: Brian Sussman on Jul 11, 2012

Comments: This plan is based on debatable data, and driven by an agenda which seeks to move California away from a free-market economy and into a highly planned, centrally controlled, rigorously regulated system.

The bowels of this plan originate in dreamy goals set forth by the United Nations and were never voted upon by the people of California.

The bogus public hearings conducted by the state were one-way PR stunts designed to provide the appearance of inclusiveness.

As a meteorologist and bestselling author, I detest this plan and am therefore making my voice heard.

Brian Sussman

917.	Name: Carol Stein on Jul 11, 2012 Comments:
918.	Name: Anonymous on Jul 11, 2012 Comments:
919.	Name: Anonymous on Jul 11, 2012 Comments:
920.	Name: Charles F. Maher on Jul 11, 2012 Comments: Thank you for trying.
921.	Name: Lisa Mellberg on Jul 11, 2012 Comments: This is an outrage. What happened to transparent government? What happened to government by the people for the people rather than unelected bureaucrats developing plans to benefit themselves and their friends?
922.	Name: Michelle Cherrick on Jul 11, 2012 Comments:
923.	Name: Anonymous on Jul 11, 2012 Comments:
924.	Name: Richard Keane on Jul 11, 2012 Comments:
925.	Name: Valerie Davis on Jul 11, 2012 Comments:
926.	Name: Chris Stanley on Jul 11, 2012 Comments:
927.	Name: Marilynne L. Mellander on Jul 11, 2012

Comments: Choose Option/Plan #1 NO PLAN BAY AREA

928.	Name: Joy Schoming on Jul 11, 2012 Comments:
929.	Name: Haran Schoming on Jul 11, 2012 Comments:
930.	Name: Randy Allen on Jul 11, 2012 Comments: I want FREEDOM !!!
931.	Name: Gene LeMasters on Jul 11, 2012 Comments: I Never VOTED for this.
932.	Name: Joan Roldan on Jul 11, 2012 Comments: Who made you in charge of my LIFE?
933.	Name: Melinda Garcia on Jul 11, 2012 Comments: JUST SAY NO
934.	Name: Maria Amaya on Jul 11, 2012 Comments: HELL HELL NO
935.	Name: Donna Menche on Jul 11, 2012 Comments: I don't care to live like the population does in North Korea nor any Socialist country. I am for the freedoms identified in the U.S. Constitution interpreted as they were written. Our constitution has been around since 1776 and has done quite well, thank you, and I want to keep in that way. If the proponents of this think this is a good idea, I suggest they fly quickly to another country that suits their fancy and leave us alone. I am certain there are many elsewhere who would gladly trade places with you.
936.	Name: Judi Schellenberg on Jul 11, 2012 Comments: ABAG and MTC have made my skin crawl since I first read about them. We need LESS agencies like these in our livesnot more.
937.	Name: John Baker on Jul 11, 2012 Comments: keep up the good work.
938.	Name: John Evans on Jul 11, 2012 Comments:
939.	Name: Frank Opelski on Jul 11, 2012 Comments: 1. Impossible to make an informed decision on the merits of this Plan w/o adequate time for review. 2. Opposed to transfer of authority to unelected officials.
940.	Name: Anonymous on Jul 11, 2012 Comments:
941.	Name: Ronald Lindberg on Jul 11, 2012 Comments:
942.	Name: Madeline Sabo-Jackson on Jul 11, 2012 Comments:
943.	Name: Jon Difrancesco on Jul 11, 2012 Comments:

944. Name: James Evart on Jul 11, 2012 Comments: This is a republic run by the people and for the people not a socialist despotic beaurocratic olagarcy.

945.	Name: Anonymous on Jul 11, 2012 Comments:
946.	Name: Jeff Lim on Jul 11, 2012 Comments:
947.	Name: Joe Ellis on Jul 11, 2012 Comments: that's the worst plan I've ever heard of, what happened to a free country were our opinions mattered
948.	Name: Anonymous on Jul 11, 2012 Comments:
949.	Name: Frank Kauzlarich on Jul 11, 2012 Comments:
950.	Name: Ellen Bordy on Jul 11, 2012 Comments:
951.	Name: Hunter Mcconnell on Jul 11, 2012 Comments: a-21 no way!!
952.	Name: Robert Stellman on Jul 11, 2012 Comments: Stop Government Control
953.	Name: Trudy McNab on Jul 11, 2012 Comments: There needs to be more time to review and comment on the EIR
954.	Name: Anonymous on Jul 11, 2012 Comments:
955.	Name: Anonymous on Jul 11, 2012 Comments:
956.	Name: Glenn Gelineau on Jul 11, 2012 Comments:
957.	Name: Mike Kauzlarich on Jul 11, 2012 Comments:
958.	Name: Paul Martin on Jul 11, 2012 Comments:
959.	Name: Maria Di Lena on Jul 11, 2012 Comments: We want this country to continue to be free and not turned into a socialist nation
960.	Name: Anonymous on Jul 11, 2012 Comments:
961.	Name: Brian R Cameron on Jul 11, 2012 Comments:
962.	Name: Sibyl Bal on Jul 11, 2012 Comments:

963.	Name: Amy Freeman on Jul 11, 2012 Comments: Do not try and take away my rights. This is America!
964.	Name: James Martin on Jul 11, 2012 Comments: no way for "one bay area"
965.	Name: Don LORENSON on Jul 11, 2012 Comments:
966.	Name: Eric F Schaller on Jul 11, 2012 Comments: Stop Agenda 21, ICLEI, Sustainable Development, and Smart Growththe people want THEIR land to use as THEY see fit!
967.	Name: Anonymous on Jul 11, 2012 Comments:
968.	Name: Cynthia Carpenetti on Jul 11, 2012 Comments:
969.	Name: Anonymous on Jul 11, 2012 Comments:
970.	Name: Jeff DeFabio on Jul 11, 2012 Comments:
971.	Name: Anonymous on Jul 11, 2012 Comments:
972.	Name: Patricia Levy on Jul 11, 2012 Comments:
973.	Name: Jay Adams on Jul 11, 2012 Comments:
974.	Name: Holly Conse on Jul 11, 2012 Comments:
975.	Name: Kathy Johnston on Jul 11, 2012 Comments:
976.	Name: Ken Dashner on Jul 11, 2012 Comments:
977.	Name: Lloyd Dashner Jr on Jul 11, 2012 Comments:
978.	Name: Lynn Pilling on Jul 11, 2012 Comments:
979.	Name: Nina Pfeifer on Jul 11, 2012 Comments:
980.	Name: Salina Conse on Jul 11, 2012 Comments:

981.	Name: Anonymous on Jul 11, 2012 Comments:
982.	Name: Anonymous on Jul 11, 2012 Comments:
983.	Name: Douglas Kasai on Jul 11, 2012 Comments:
984.	Name: Roger Inman on Jul 11, 2012 Comments: Please stop this "brown shirt, arm band" atempt to socialy engineer our lives!
985.	Name: Gregory Levesque on Jul 11, 2012 Comments: Government does not need to oversee every thing its citizen's do. The study is inadequate and incomplete. There must be more time allowed to do a full investigation. Why is this issue being forced through the system so quickly? What are you trying to hide?
986.	Name: Richard Abernethy on Jul 11, 2012 Comments:
987.	Name: Charles on Jul 11, 2012 Comments:
988.	Name: John Jones on Jul 11, 2012 Comments: Please extend deadline as requested.
989.	Name: Anonymous on Jul 11, 2012 Comments: This couls be the straw that breaks the camel's back for me - time to leave California!
990.	Name: William Bethke on Jul 11, 2012 Comments:
991.	Name: Anonymous on Jul 11, 2012 Comments:
992.	Name: Brian McDonough on Jul 11, 2012 Comments:
993.	Name: Ron Konopaski on Jul 11, 2012 Comments:
994.	Name: Anonymous on Jul 11, 2012 Comments:
995.	Name: Patricia Martine on Jul 11, 2012 Comments:
996.	Name: Georgia Garfink on Jul 11, 2012 Comments:
997.	Name: Laura Robba on Jul 11, 2012 Comments: Why don't you worry about the environmental impact of other countrieswe have the the cleanest most uncostitutionally regulated state in the country!!!!! Yet China, India, Hong Kong etcare allowed to run rough shod over the planet with their filthy air and lack of environmentalism!!!! Hypocrisy at it's worst!!!!

998. Name: Anonymous on Jul 11, 2012

Comments: We need an open real meetings and let the truth be said. WHY? MTC and ABAG have put in place a "fast track" without (EIR) on Plan Bay Area that is seriously incomplete and inadequate.

999.	Name: Les Darbison on Jul 11, 2012 Comments:
1000.	Name: Paulette J Kolm on Jul 11, 2012 Comments:
1001.	Name: Anonymous on Jul 11, 2012 Comments: I completely support the goals of this petition. The lack of individual involvement, as well as the lack of listening is most disturbing.
1002.	Name: Lola Pargett on Jul 11, 2012 Comments: Thank you for organizing this petition. I hope .I'm not too late in signing.
1003.	Name: Robert S. Allen on Jul 11, 2012 Comments: Hope I'm not too Ite, but I'm afraid I am. I have sent my own comments independent of this petition.
1004.	Name: Robert S. Allen on Jul 11, 2012 Comments: Hope I'm not too Ite, but I'm afraid I am. I have sent my own comments independent of this petition.
1005.	Name: Anonymous on Jul 11, 2012 Comments: We are finding the same problem with building for density in our Metro Vancouver, BC Canada. If they had a choice, we would all be forced to ride bikes.
1006.	Name: Thomas Van Dyke on Jul 11, 2012 Comments: We need to get out of the UN
1007.	Name: Anonymous on Jul 11, 2012 Comments:
1008.	Name: Anonymous on Jul 11, 2012 Comments:
1009.	Name: Anonymous on Jul 11, 2012 Comments:
1010.	Name: Kenneth Carlson on Jul 11, 2012 Comments:
1011.	Name: Charlotte Carlson on Jul 11, 2012 Comments:
1012.	Name: Anonymous on Jul 12, 2012 Comments:
1013.	Name: Beth J. Benjamin on Jul 12, 2012 Comments:
1014.	Name: Joyce A. Lindberg on Jul 12, 2012 Comments: Sounds like Agenda 21let's get the UN out of our local government!
1015.	Name: Glenn Ellen Smith on Jul 12, 2012 Comments:



100 Civic Plaza Dublin, California 94568 Phone: (925) 833-6650 Fax: (925) 833-6651

**City Council** (925) 833-6650 City Manager (925) 833-6650 **Community Development** (925) 833-6610 **Economic Development** (925) 833-6650 **Finance/Admin Services** (925) 833-6640 **Fire Prevention** (925) 833-6606 Human Resources (925) 833-6605 Parks & Community Services (925) 556-4500 Police (925) 833-6670 **Public Works/Engineering** 



(925) 833-6630

www.dublin.ca.gov

July 3, 2012

Ashley Nguyen EIR Project Manager Metropolitan Transportation Commission Joseph P. Bort MetroCenter 101 8<sup>th</sup> Street Oakland, CA 94607-4700

Subject: Notice of Preparation of a Draft Environmental Impact Report for Plan Bay Area

Dear Ms. Nguyen:

The City of Dublin has received the Notice of Preparation (NOP) of a Draft Environmental Impact Report for Plan Bay Area and appreciates the opportunity to review and comment on the NOP.

In previous letters to the Association of Bay Area Governments and Metropolitan Transportation Commission, the City of Dublin has expressed concerns over the housing and job allocations as proposed under the Jobs-Housing Connection Strategy for the Sustainable Communities Strategy component of Plan Bay Area. The proposed distribution of housing and jobs has environmental implications for the City of Dublin that should be addressed in the Draft Environmental Impact Report that is being prepared for Plan Bay Area.

The housing allocation for Dublin does not align with current Planning documents and overestimates housing within all 3 of our Priority Development Areas. Additionally, the employment allocations in the Jobs-Housing Connection Strategy remain severely underestimated.

Table 1 below provides a comparison of the Jobs-Housing Connection Strategy with the City's estimates and includes the City-wide housing and employment allocations contained in the Jobs-Housing Connection Scenario.

The housing unit allocation in the Jobs-Housing Connection Scenario overestimated housing growth in Dublin by 7,859 units; in the Jobs-Housing Connection Strategy, housing growth is underestimated by 4,831 units and overestimated in all 3 of Dublin's Priority Development Areas. Based on current Planning documents, certified environmental impact reports, and recently constructed neighborhoods that will remain in place far beyond 2040, Dublin has provided housing growth projections for our community that are realistic. The Draft Environmental Impact Report (EIR) should evaluate the environmental impacts of this overestimation of housing at a local level. Additionally, because the Project does not align with Dublin's current Planning documents, at least one of the Draft EIR alternatives should include Dublin's housing growth projections as shown below in Table 1.

The Project also includes employment growth allocations that severely underestimate job growth by 15,601 jobs. Failure to recognize the job growth potential within Dublin and especially within the Transit Center Priority Development Area (PDA) undermines the value of this PDA and its ability to capitalize on the financial investments made by the Bay Area Rapid Transit District (BART). The Draft EIR should evaluate the environmental impacts of the underestimation of employment growth at a local level, including but not limited to the jobs-to-housing imbalance that would result from the Project. Additionally, because the Project does not align with Dublin's current Planning documents, at least one of the Draft EIR alternatives should include Dublin's job growth projections as shown below in Table 1.

	Housing Units			Jobs		
	ABAG/ MTC	City of Dublin	Difference	ABAG/ MTC	City of Dublin	Difference
Downtown Dublin PDA	1,790	1,634	+156	8,340	5,952	+2,388
Town Center PDA	5,990	5,949	+41	1,320	3,014	-1,694
Transit Center PDA	3,810	3,400	+410	6,370	9,028	-2,658
Citywide Total	24,320	28,701	-4,381	29,300	44,901	-15,601
Jobs-Housing Connection Scenario (March 9, 2012)	36,560	28,701	+7,859	28,060	44,901	-16,841

Table 1. Housing and Job Growth Com
-------------------------------------

The City appreciates the opportunity to review and comment on the Notice of Preparation (NOP) of a Draft Environmental Impact Report for Plan Bay Area and looks forward to working with you throughout the preparation of the Environmental Impact Report.

Sincerely,

Jeri Ram, AICP Community Development Director

CC: Joni Pattillo, City Manager Chris Foss, Assistant City Manager Jeff Baker, Planning Manager Marnie Delgado, Senior Planner Beth Walukas, Deputy Director of Planning

From:	eircomments
To:	Brent Butler
Date:	7/11/2012 5:27 PM
Subject:	Re: City of East Palo Alto Comment Letter

Thank you for your comments; they will be considered carefully during the preparation of the Plan Bay Area Environmental Impact Report (EIR). To stay updated on Plan Bay Area and the environmental process, please visit <u>www.onebayarea.org</u>.

Ashley Nguyen, EIR Project Manager Metropolitan Transportation Commission 101 8th Street Oakland, CA 94607 (510) 817-5809

>>> "Brent Butler" <<u>bbutler@cityofepa.org</u>> 7/11/2012 4:02 PM >>> Dear Ashley,

Please find the City's DEIR comment letter.

Thank you,

-Brent

\*\*\*\*\*

Brent Alfred Butler, AICP, CFM

http://www.ci.east-palo-alto.ca.us/planningdiv/index.html < http://www.ci.east-palo-alto.ca.us/planningdiv/index.html >

Planning Manager, Planning Division, City of East Palo Alto, 1960 Tate Street, East Palo Alto 94303

TEL: 1 (650) 853-3185; FAX: 1 (650) 853-3179; DIRECT: 1 (650) 853-3121



# CITY OF EAST PALO ALTO

Community Development Department Planning Division 1960 Tate Street, East Palo Alto, CA 94303 Tel. No. 650.853.3189, Fax. No. 650.853.3179

July 11, 2012

Ashley Nguyen, EIR Project Manager Metropolitan Transportation Commission 101 Eighth Street Oakland, CA 94607

# Re: Comment on Draft Environmental Impact Report

Dear Ms. Ashley Nguyen:

As a member of the Bay Area Consortium which is drafting the *San Francisco Bay Area Regional Prosperity Plan* to promote a more compact land use pattern for the Bay Area, the City of East Palo Alto welcomes the One Bay Area Plan ("OBAG") and identifies in this letter some of the salient issues which the City feels should be incorporated in the analysis of the five alternatives chosen by the Association of Bay Area Governments ("ABAG") and the Metropolitan Transportation Commission ("MTC").

Two of the five alternatives have been subject to discussion at a local level and are seen as reasonably addressing the needs of suburban communities such as EPA, namely; Alternative #2-*Jobs Housing Connection Strategy* and *Alternative* #5 - *Environment, Equity and Jobs.* 

## Housing Connection - RHNA

The City of East Palo Alto ("EPA") has a severe jobs housing imbalance, with a deficit of jobs, and therefore supports those alternatives that enable distressed suburban communities to produce more jobs as a way of reducing this disparity. For this reason the City welcomes the 2014-2022 Regional Housing Needs Allocations (RHNA) proposed by ABAG because it reduces the City's required production of housing from 630 units in the 2007-2014 RHNA cycle to 466 units in the 2014-2022 RHNA cycle. ABAG's RHNA more equitably distributes the burden of affordable housing production, while also enabling EPA to encourage commercial use of lands to spur job growth, further reducing the imbalance.

# Public Infrastructure Analysis

It is critically important to note that the City also strongly supports scenario five, *the Environment, Equity and Jobs Scenario* since this scenario recognizes the importance of equitably distributing regional resources, such as water so that job growth in depressed suburban areas such as EPA can be realized. Consequently, the City would be eager to see some analysis of public investments necessary to achieve these goals. This may better enable decision makers to understand the feasibility of implementing the various scenarios. A matrix that identifies the PDAs' needs including, but not limited to, open space and water might be a way to ground truth the outputs. As the Urban Land Institute notes, all too frequently the financial burden placed upon developers is too great to deliver the desired product.

## Implementation Measures

The City not only anticipates that some of the implementation actions contained in Table 4.1 could synergize EPA's June 2012 Draft Economic Development Strategy, which highlights City's public infrastructure investment needs, but that the need for these actions are likely applicable throughout the Bay Area. In Table 4.1 Implementation Actions Summary, several actions are particularly noteworthy, including: 2.2 Create a Regional Affordable Housing Trust Fund; 3.5 Create an Economic Development Strategy Addressing the Needs of Distressed Suburban Communities; 4.4 Improve School Accessibility; 4.6 Increase Park Funding for PDAs; and 4.7 Integrate Community Health into PDA Planning. Many studies enumerated in publications such as *Making Places Healthy* (Jackson et.al. 2011) illustrate that these regional planning challenges, and proposed solutions are very likely transferable across distressed suburban communities throughout the Bay Area.

A sampling of some of the findings from a recent technical assistance panel convened by the ULI for EPA identifies what might be necessary for the City's economic development needs to be met, including:

- Ravenswood Business District back-bone infrastructure improvements, especially in respect to sewer, storm drain, street, and pedestrian improvements
- Access to water
- Open space, parks and trail improvements
- Workforce development including First Source efforts
- Staffing for economic development efforts

Surely these measures, as previously mentioned, are shared by other similar communities.

For these reasons, the City fully endorses ABAG/MTC proposed scenarios: *Jobs Housing Connection Strategy*, and *Environment*, *Equity and Jobs*, and encourages a thoughtful and comprehensive analysis of the various alternatives.

Very truly yours,

Brent A. Butler, AICP, CFM

PLANNING DIVISION MANAGER

From:	eircomments
To:	Ann Merideth
Date:	7/10/2012 3:28 PM
Subject:	Re: Lafayette's Comments on EIR NOP

Thank you for your comments; they will be considered carefully during the preparation of the Plan Bay Area Environmental Impact Report (EIR). To stay updated on Plan Bay Area and the environmental process, please visit <u>www.onebayarea.org</u>.

Ashley Nguyen, EIR Project Manager Metropolitan Transportation Commission 101 8th Street Oakland, CA 94607 (510) 817-5809

>>> "Merideth, Ann" <AMerideth@ci.lafayette.ca.us> 7/10/2012 1:03 PM >>>



#### City Council

Carol Federighi, Mayor Mike Anderson, Vice Mayor Brandt Andersson, Council Member Carl Anduri, Council Member Don Tatzin, Council Member

July 10, 2012

Ashley Nguyen, EIR Project Manager Metropolitan Transportation Commission 101 Eighth Street Oakland, CA 94607-4700

Subject: Response to the Notice of Preparation of a Draft EIR for Plan Bay Area

Dear Ashley:

Thank you for the opportunity to comment on the Notice of Preparation (NOP) for the Draft Environmental Impact Report (EIR) for Plan Bay Area. The City has three concerns.

- Alternative 4 is infeasible. It assumes that "all Bay Area jobs will be filled by Bay Area workers (thereby
  eliminating in-commuting from neighboring regions)." While such a scenario is desirable, it will never occur.
  The probability that enough affordable housing can be built in the Bay Area to reduce significantly incommuting is remote. CEQA requires an EIR to "...consider a reasonable range of potentially feasible
  alternatives that will foster informed decisonmaking and public participation. An EIR is not required to
  consider alternatives that are infeasible." Further, people have always lived in other regions but worked in the
  Bay Area for a variety of reasons, and their commute trips may or may not have any greater impact than
  commute trips by those who both live and work in the Bay Area.
- 2. The EIR should include an alternative that is more closely aligned with local land use plans and policies and regional growth trends. Such an alternative would be more realistic and more feasible since the local communities have already tested their plans and policies.
- 3. The City agrees with CCTA's concerns about the UrbanSIM model. While City staff is familiar with the model and its great potential for both regional and local planning in the future, it is still untested. We question its use for such an important analysis at this time. If the model will be used, then the process should be completely accessible to MTC's partners.

Thank you again for the opportunity to comment. If you have any questions, please contact Ann Merideth, Special Projects Manager, at amerideth@ci.lafayette.ca.us or 925.284.1968.

City Manager

Cc: Mayor Federighi and Members of the Lafayette City Council

July 11, 2012

Ashley Nguyen, EIR Project Manager Metropolitan Transportation Commission Joseph P. Bort MetroCenter 101 Eighth Street Oakland, CA 94607-4700

RE: Notice of Preparation of Draft EIR for Plan Bay Area

LIVERMO

Dear Ms. Nguyen:

Thank you for the opportunity to provide comments on the preparation of the Draft Environmental Impact Report (EIR) for Plan Bay Area. Plan Bay Area is intended to meet the requirements of SB 375 by developing an integrated Regional Transportation Plan/Sustainable Communities Strategy plan to attain greenhouse gas emission reduction targets.

The City of Livermore previously submitted comments on the Jobs-Housing Connection Scenario to the Association of Bay Area Governments (ABAG) and the Metropolitan Transportation Commission (MTC) in a letter dated April 20, 20102. Issues identified by the City regarding the Jobs-Housing Scenario (now part of Plan Bay Area) in the attached letter should be considered for evaluation in the Draft EIR.

In addition to the issues expressed in the City's April 20, 2012 letter, we continue to have great concerns regarding the ability of local cities to implement the policies and programs included in Plan Bay Area. With the dissolution of redevelopment agencies throughout the State, cities have lost a significant funding source for affordable housing and other programs to support transit oriented development. Other funding sources have declined or disappeared. The fiscal reality of local jurisdictions' ability to plan and implement the land use and transportation development envisioned in Plan Bay Area needs to be considered in determining the feasibility of the plan.

The City of Livermore is committed to the development of transit oriented developments to support the extension of BART to the Isabel and Greenville (East Industrial) Priority Development Areas. The City will continue working with ABAG and MTC, as well as the Alameda County Transportation Commission, on addressing and resolving issues relating to development and implementation of the Sustainable Communities Strategy.

City Hall

1052 South Livermore Avenue · Livermore, CA 94550

www.ci.livermore.ca.us

Ms. Ashley Nguyen July 11, 2012 Page 2 of 2

If you have any questions, please contact me at (925) 960-4462, or by e-mail at smfrost@cityoflivermore.net.

Sincerely,

Ausan Fost

Susan Frost Principal Planner

Attachment: Letter to MTC/ABAG, dated April 20, 2012

Cc: Mayor John Marchand and City Council Members Marc Roberts, City Manager Stephan Kiefer, Community Development Director Paul Spence, Planning Manager Beth Walukus, Deputy Director of Planning, Ala. Co. Transportation Commission

LIVER

April 20, 2012

Mr. Steve Heminger Executive Director Metropolitan Transportation Commission Joseph P. Bort MetroCenter 101 8<sup>th</sup> Street Oakland, CA 94607-4756

Mr. Ezra Rapport Executive Director Association of Bay Area Governments Joseph P. Bort MetroCenter 101 8<sup>th</sup> Street Oakland, CA 94607-4756

RE: Jobs Housing Connection Scenario

Dear Mr. Heminger and Mr. Rapport:

The City of Livermore appreciates the opportunity to review and comment on the Jobs Housing Connection Scenario proposed as the preferred scenario for the SCS for the Bay Area. Livermore has worked with the Alameda County Planning Directors and the Alameda County Transportation Commission to review the previous scenarios developed to meet the targets of SB 375 to reduce greenhouse gas (GHG) emissions by 15 percent by 2035.

The Sustainable Communities Strategy (SCS) process and the Jobs Housing Connection Scenario were presented to the Livermore City Council on April 9, 2012. The City Council expressed several concerns regarding the SCS process, including:

- Jobs and housing numbers should more closely relate to the City's vision for local growth. The SCS has not taken constraints to growth sufficiently into account in terms of impacts to traffic, water, sewer, schools, etc.
- The loss of redevelopment agencies and related housing funds needs to be acknowledged. The suggestion that we look to non-profit organizations, such as Habitat for Humanity, to fill the affordable housing gap does not sufficiently address the problem.

www.collivermore.co.us

Mr. Heminger and Mr. Rapport April 20, 2012 Page 2 of 5

- The information provided demonstrates that the majority of current jobs are located in close proximity to freeway interchanges. The Jobs Housing Connection Scenario redirects the development of jobs to transit corridors. While utilizing the existing transit network is appropriate, the distribution of jobs should also reflect local populations in terms of numbers, education, and incomes.
- It should also be noted that with telecommuting and other electronic means of conducting business, many companies no longer need large building complexes for all employees. Concentrating all future job growth along transit corridors is not appropriate given recent trends on how business is being conducted. We need to incentivize the local distribution of jobs in a way that matches local populations.
- Since the various scenarios presented do not meet the GHG emission reduction targets, additional means of reducing emissions must be considered, such as incentivizing electric vehicle use and construction of electric vehicle charging stations.
- The Job Housing Connection Scenario identifies the aging of our population as a significant demographic trend. We need to reflect the changes in our population in our funding priorities. The elderly are less likely to need bike lanes and more likely to need well planned convenient access to services.
- We do not live in an unconstrained world. We need to consider the impacts and constraints to growth and we need funding assistance, not just to plan for, but also to construct, needed infrastructure improvements.

Livermore recognizes the value of regional planning to address broader issues that cross-jurisdictional boundaries such as transportation and air quality. However, such regional planning should consider the unique circumstances and constraints that each local jurisdiction must face. While it is difficult to tailor broader regional efforts to suit individual circumstances, it is also unreasonable to expect a "one size fits all" approach to be viable at a local level. Implementation of the SCS must be a true partnership that recognizes each jurisdiction's rights and responsibilities with local control while balancing the needs and influences at a regional level.

The City of Livermore concurs with general concerns expressed by other local jurisdictions relating to the land use scenarios and eventual implementation. Developing land uses consistent with and in support of the targets of the SCS will require substantial commitments of local staff and financial resources. Planning studies and environmental review must be completed for Priority Development Areas (PDAs) and other infill areas, infrastructure improvements will most likely be needed to

Mr. Heminger and Mr. Rapport April 20, 2012 Page 3 of 5

support development beyond what is currently included in local General Plans, and community engagement at a local level will be a critical, on-going component for the successful implementation of the SCS. Considering that local governments' finances are already strained, the identification and provision of additional funding sources should be included in the SCS.

Over the past few years, each of the regional agencies, following its own mandate, has established policies and regulations in regard to development that can have significant impacts on the costs of infill development. For example, the Regional Water Quality Control Board has previously adopted standards on impervious surfaces and non-point source pollutants and the Regional Transportation Plan establishes through its guidelines how and where funding will be available for transportation improvements. Taken in isolation, each agency promotes critical governmental objectives; but in totality, they contribute to increasing constraints, complexity, costs and uncertainty for the development type we say we are interested in promoting: higher density infill. These regional regulations can have the unintended consequence of further impeding infill development that already faces numerous hurdles not faced by a greenfield project: nearby unhappy neighbors, highly uncertain site conditions, and unique design requirements, to mention just a few.

SB 375 provides an opportunity for the region to harmonize and standardize its requirements and to identify regional strategies that in combination can encourage infill development. The Environmental Impact Report (EIR) for the SCS and the analysis leading up to it are an unprecedented opportunity to consider how regional policies and mitigations can be harmonized and restructured to help even the playing field for infill development. We urge that as the regional agencies gear up for the EIR for the SCS and that they commit sufficient resources to undertaking the larger effort needed to work together to consider how they can make it easier – not harder – for infill development to occur.

Development of the SCS has also brought forward a number of other issues that have been considered impediments to the development patterns we wish to encourage, but that remain unaddressed year after year. These issues include the fiscalization of land use. So long as there are significant fiscal benefits from commercial/retail development, and significant long-term costs associated with residential development (and especially rental housing buildings that generally sell and are reassessed less often than single family homes), the promotion of appropriate development patterns will continue to face an uphill fiscal battle.

Another issue relates to transit availability. The SCS and the PDAs that will be the foundation of the SCS necessarily must rely on transit "nodes" as the basis for meeting housing needs. In order for developers and communities to invest in those locations, there is a need for certainty that the transit will be there for the long term, and that the

Mr. Heminger and Mr. Rapport April 20, 2012 Page 4 of 5

service will be adequate to address the demands placed on it. Meanwhile, over the past few years that certainty has been undermined by cutbacks on funding for transit. Future transit improvements need to be considered in light of implementing the land uses of the SCS and especially the very high intensity land uses identified in the PDAs. In Livermore's case, the two largest PDAs include the areas surrounding the future BART stations. While housing is important for determining and ensuring appropriate ridership numbers, MTC's Resolution 3434 does not account for employment in proximity to future BART stations as criteria for extensions. The majority of future residential and employment growth is anticipated in the Isabel and Greenville PDA's and both should be considered in determining future ridership numbers. Also, the majority of future transit system; therefore, employment as well as housing should be considered in planning transit extensions.

The City also has several comments on the Jobs Housing Connection Scenario report dated March 2012. These include:

- Page 13, Figure 4, Employment by Sector, Past and Future. The trend lines between 1990 and 2010 are not shown for construction jobs or agriculture and natural resources jobs.
- Page 49, Alameda County Future Place Types for PDAs map. The Protected Open Space only includes areas that are owned by regional recreation/open space agencies. Open space preservation is a constraint on local growth that should be fully acknowledged and considered. Protected open space also includes areas with conservation easements, such as in the South Livermore Valley vineyard areas, and lands under Williamson Act contracts. The approved Priority Conservation Areas should be clearly identified on this map. The open space areas are further protected by urban growth boundaries, such as the Livermore UGB, which should also be shown on the map.

In addition, information provided on the distribution of land uses in MTC traffic zones needs to be closely reviewed to ensure that future growth is directed to areas planned or anticipated for growth, such as the PDAs. To this end, the City requests the opportunity to meet with MTC and ABAG staff regarding the location of future growth within Livermore. For example, one traffic zone that covers a long-established residential neighborhood shows an increase of about 140 households by 2035, but a decrease in household population of over 1,000.

The City of Livermore will continue working with ABAG and MTC, as well as the Alameda County Transportation Commission, on addressing and resolving issues relating to development of the SCS.

Mr. Heminger and Mr. Rapport April 20, 2012 Page 5 of 5

If you have any questions, please contact Susan Frost, Principal Planner, at (925) 960- 4462, or by e-mail at <a href="mailto:smfrost@ci.ivermore.ca.us">smfrost@ci.ivermore.ca.us</a>.

Sincerely,

Stephan Kiefer Community Development Director

cc: Mayor John Marchand and City Council Members Marc Roberts, City Manager Paul Spence, Planning Manager Susan Frost, Principal Planner Ken Kirkey, Planning Director, ABAG Doug Kimsey, Planning Director, MTC Beth Walukus, Deputy Director of Planning, Ala. Co. Transportation Commission

From:	eircomments
To:	Nicole S Mariano
CC:	Alex D McIntyre; Arlinda A Heineck; Atul I Patel; Charles W Taylor; Justin I C Murphy;
William McClure	
Date:	7/11/2012 5:27 PM
Subject:	Re: Notice of Preparation (NOP) of a Draft Environmental Impact Report for Plan Bay Area

Thank you for your comments; they will be considered carefully during the preparation of the Plan Bay Area Environmental Impact Report (EIR). To stay updated on Plan Bay Area and the environmental process, please visit <u>www.onebayarea.org</u>.

Ashley Nguyen, EIR Project Manager Metropolitan Transportation Commission 101 8th Street Oakland, CA 94607 (510) 817-5809

>>> "Mariano, Nicole S" <<u>nsmariano@menlopark.org</u>> 7/11/2012 3:34 PM >>> Good evening,

Please see attached letter.

Thank you.

Nicole Mariano City of Menlo Park 701 Laurel Street Menlo Park, CA 94025 Phone: 650.330.6754 Fax: 650.327.5497 Website: http://www.menlopark.org/ My hours: Mon-Thur 9:00am - 5:30pm KIRSTEN KEITH MAYOR

PETER OHTAKI MAYOR PRO TEM

ANDREW COHEN COUNCIL MEMBER

RICHARD CLINE COUNCIL MEMEBR

KELLY FERGUSSON COUNCIL MEMBER

Building TEL 650.330.6704 FAX 650.327.5403

**City Clerk** TEL 650.330.6620 FAX 650.328.7935

City Council TEL 650.330.6630 FAX 650.328.7935

City Manager's Office TEL 650.330.6610 FAX 650.328.7935

Community Services TEL 650.330.2200 FAX 650.324.1721

Engineering TEL 650.330.6740 FAX 650.327.5497

Environmental TEL 650.330.6763 FAX 650.327.5497

Finance TEL 650.330.6640 FAX 650.327.5391

Housing & Redevelopment TEL 650.330.6706 FAX 650.327.1759

Library TEL 650.330.2500 FAX 650.327.7030

Maintenance TEL 650.330.6780 FAX 650.327.1953

Personnel TEL 650.330.6670 FAX 650.327.5382

Planning TEL 650.330.6702 FAX 650.327.1653

Police TEL 650.330.6300 FAX 650.327.4314

Transportation TEL 650.330.6770 FAX 650.327.5497



701 LAUREL STREET, MENLO PARK, CA 94025-3483 www.menlopark.org

July 11, 2012

<u>Sent via Regular Mail and E-Mail</u> Ashley Nguyen, EIR Project Manager Metropolitan Transportation Commission 101 Eighth Street, Oakland, CA 94607

# Re: Notice of Preparation (NOP) of a Draft Environmental Impact Report for Plan Bay Area

Dear Ms. Nguyen:

Thank you for the opportunity to review and comment on the Notice of Preparation (NOP) for the Draft Environmental Impact Report for Plan Bay Area. Since the Bay Area is projected to add over 2 million people, 1.1 million new jobs, and 660,000 new housing units between 2010 and 2040, some of which is anticipated in San Mateo County and potentially in the City of Menlo Park, the City is concerned about the traffic and water supply impacts that this Plan will have on Menlo Park and wants to find the best ways to minimize those impacts.

## Traffic and Transportation

Specifically, with respect to traffic and transportation, in preparing the Environmental Impact Report, MTC and its environmental consultants should consult with the City of Menlo Park's transportation staff regarding which roadways and intersections in Menlo Park should be analyzed. All roadways and intersections that may be affected by traffic from the Plan within Menlo Park need to be evaluated as part of the Environmental Impact Report. Those intersections and roadways to be analyzed should be approved by the City of Menlo Park's transportation staff. Furthermore, the Menlo Park Transportation Impact Analysis Guidelines ("Guidelines") should be used for the analysis of all roadways and intersections within Menlo Park. The thresholds of significance for traffic impacts are identified in the Guidelines and should be used when determining impacts within Menlo Park. The thresholds of significance in our guidelines can be easily triggered by a small increase in trips generated by a proposed Plan or project. A copy of these Guidelines can be found at http://www.menlopark.org/departments/trn/trn\_tiag.pdf.

Out of the five alternatives being analyzed in the EIR, the City is very concerned regarding any alternatives that eliminate funding for arterial operations and would

likely not support those alternatives. Based on MTC's field evaluations of the signal coordination projects to date, there are substantial benefits from signal coordination. The benefits are travel time savings for transit and autos, fuel reduction, reduction in greenhouse gases, improved bicycle safety, and improved safety for pedestrians.

Arterial ITS Infrastructure, when properly operated and maintained, supports the safety and mobility of ALL modes, and is required to successfully implement other projects/strategies such as Transit Signal Priority, Complete Streets and Incident Management Plans.

### **Public Utilities**

California Water Code Section 10910 provides that when an environmental impact report is prepared for a project, the report should consider projected water demand. The environmental impact report must analyze potential water sources for the entire development and decision makers must be presented with sufficient facts to evaluate the pros and cons of supplying the amount of water the project will need. Such analysis may not be deferred and the environmental impact report may not claim that unanalyzed impacts of unknown water sources will be mitigated by a measure providing that future development will not be built if water proves unavailable.

If you have any questions regarding the comments contained in this letter, please feel free to contact Chip Taylor, Public Works Director at cwtaylor@menlopark.org or by telephone at (650) 330-6770. Again, thank you for allowing Menlo Park to participate in the review process.

Sincerely,

McIntyre City Manager

Enclosure: Menlo Park Transportation Impact Analysis Guidelines

cc: Mayor and City Council

Arlinda Heineck, Community Development Director Chip Taylor, Public Works Director Justin Murphy, Development Services Manager William L. McClure, City Attorney

# **Transportation Impact Analysis Guidelines**

The following projects would generally be exempt from the requirements of the Transportation Impact Analysis Guidelines unless their geographic location or type of use prompt such study (subject to the City's discretion):

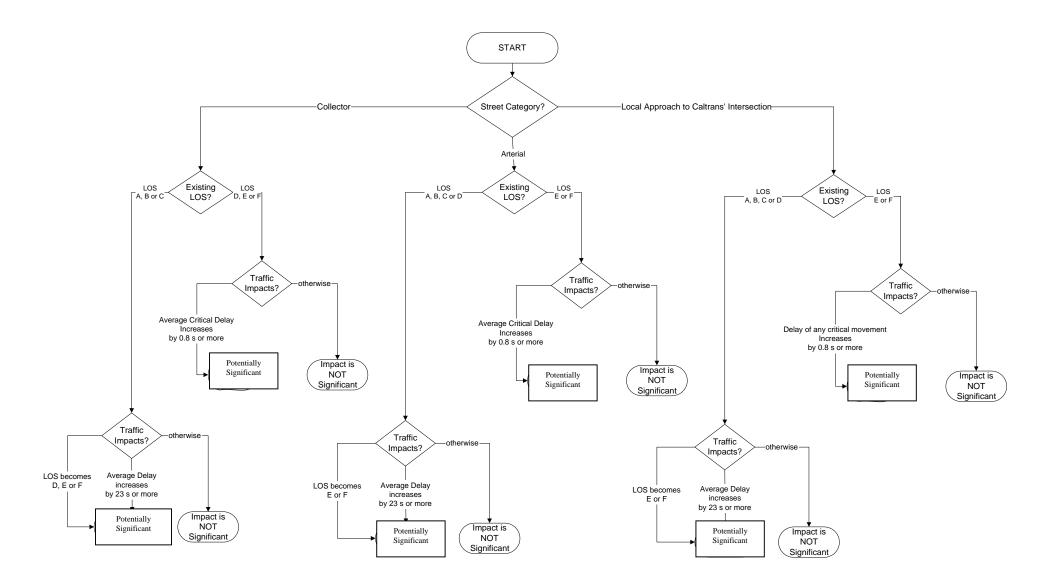
- Residential projects under five units
- Commercial projects where the total new or added square footage is 10,000 square feet or less
- Other projects that are determined to be exempt or categorically exempt under CEQA

All other projects involving a change of use and/or new construction will be required to submit a Transportation Impact Analysis performed by a qualified consultant selected by the City and paid for by the project applicant.

The Transportation Impact Analysis shall include the following:

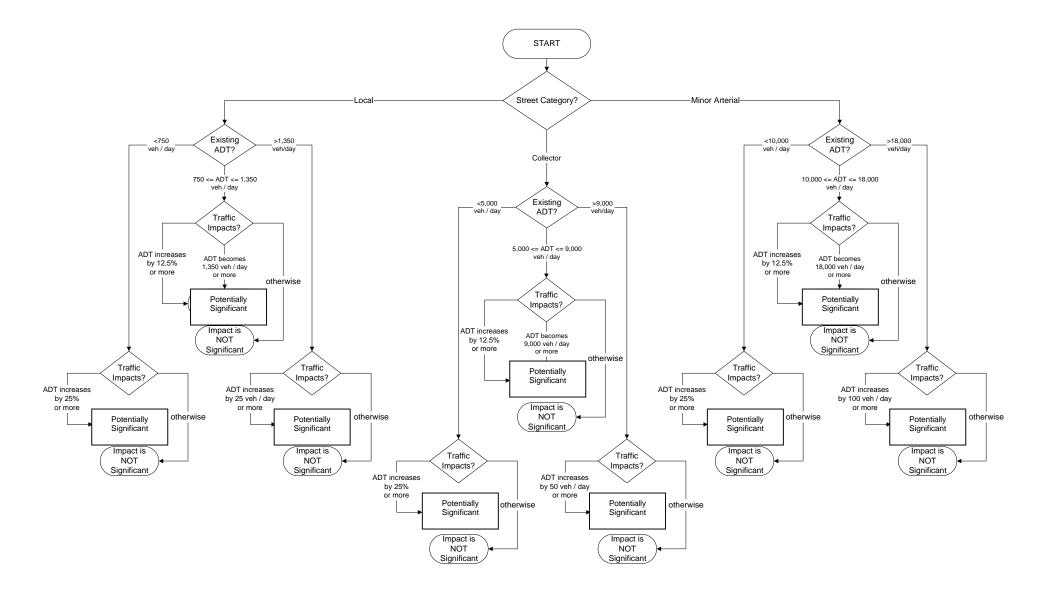
- I. Executive Summary
- II. Introduction
  - A. Project Description
  - B. Study Scope
- III. Existing Conditions Conditions should be described based upon information found in the most recent Circulation System Assessment (CSA) document when applicable. The CSA existing traffic counts and information should be used as existing conditions.
  - A. Description of existing street system serving the site (Number of lanes, classification, etc.)
  - B. CSA existing traffic volumes ADT's and AM & PM peak hours (Figure to be included in report)
  - C. CSA existing levels of service AM & PM (Table to be included in report)
  - D. Public transit (Service providers to the area)
  - E. On and off-street parking conditions/availability
  - F. Pedestrian and bicycling conditions in the project area
- IV. Cumulative Analysis Near Term conditions without project should be discussed using the most recent CSA near term traffic counts and information. Project traffic should then be added to the CSA near term traffic counts. If the project build-out is beyond the CSA near term data, future conditions should be projected to the first year of assumed project occupancy. A supplemental list of planned and or/approved projects will be provided to the consultants for inclusion in the analysis process. For large projects of regional magnitude (projects generating 100 or more trips during peak hours), the consultants will analyze the impacts of the project for a span of ten years from the existing conditions.

- A. Description of new or planned changes to the street system serving the site including changes in on-street parking
- B. Near term volumes ADT's and AM & PM peak hours
  - 1. List project trip generation rates
  - 2. Discuss trip distribution
  - 3. Discuss impact of project traffic on intersections in the project vicinity
- C. Near term levels of service AM & PM for both near term and near term plus project analysis. Table to be included in report. Also a comparison table of existing conditions including a column showing the difference in seconds of delay between existing, near term conditions and near term conditions with project and percent of increase.
- V. Analysis
  - A. Discuss impacts of CSA near term conditions and CSA near term conditions with project
    - 1. A Project is considered to have a potentially "significant" traffic impact if the addition of project traffic causes an intersection on a collector street operating at LOS "A" through "C" to operate at an unacceptable level (LOS "D", "E" or "F") or have an increase of 23 seconds or greater in average vehicle delay, whichever comes first. A potential "significant" traffic impact shall also include a project that causes an intersection on arterial streets or local approaches to State controlled signalized intersections operating at LOS "A" through "D" to operate at an unacceptable level (LOS "E" or "F") or have an increase of 23 seconds or greater in average vehicle delay, whichever comes first.
    - 2. A project is also considered to have a potentially "significant" traffic impact if the addition of project traffic causes an increase of more than 0.8 seconds of average delay to vehicles on all critical movements for intersections operating at a near term LOS "D" through "F" for collector streets and at a near term LOS "E" or "F" for arterial streets. For local approaches to State controlled signalized intersections, a project is considered to have a potentially "significant" impact if the addition of project traffic causes an increase of more than 0.8 seconds of delay to vehicles on the most critical movements for intersections operating at a near term LOS "E" or "F".



- B. In certain circumstances as determined by the Transportation Manager, analysis may be necessary for impacts on minor arterial, collector and local streets. If any of the thresholds listed below are exceeded, the analysis should make a recommendation as to whether the traffic impact is considered potentially "significant".
  - 1. On minor arterial streets, a traffic impact may be considered potentially significant if the existing Average Daily Traffic Volume (ADT) is: (1) greater than 18,000 (90% of capacity), and there is a net increase of 100 trips or more in ADT due to project related traffic; (2) the ADT is greater than 10,000 (50% of capacity) but less than 18,000, and the project related traffic increases the ADT by 12.5% or the ADT becomes 18,000 or more; or (3) the ADT is less than 10,000, and the project related traffic increases the ADT by 25%.
  - 2. On collector streets, a traffic impact may be considered potentially significant if the existing Daily Traffic Volume (ADT) is: (1) greater than 9,000 (90% of capacity), and there is a net increase of 50 trips or more in ADT due to project related traffic; (2) the ADT is greater than 5,000 (50% of capacity) but less than 9,000, and the project related traffic increases the ADT by 12.5% or the ADT becomes 9,000 or more; or (3) the ADT is less than 5,000, and the project related traffic increases the ADT by 25%.
  - 3. On local streets, a traffic impact may be considered potentially significant if the existing Daily Traffic Volume (ADT) is: (1) greater than 1,350 (90% of capacity), and there is a net increase of 25 trips or more in ADT due to project related traffic; (2) the ADT is greater than 750 (50% of capacity) but less than 1,350, and the project related traffic increases the ADT by 12.5% or the ADT becomes 1,350; or (3) the ADT is less than 750, and the project related traffic increases the ADT by 25%.
- C. Discuss project site circulation and access and identify any deficiencies.
- D. Discuss compliance of project site parking with adopted City code including loading and disabled spaces. If a shared parking arrangement is proposed, an analysis of the adequacy of this aspect shall be provided. Discuss any off-site parking impacts (such as neighborhood parking intrusion) of the project.
- E. Analyze project in relation to relevant policies of the Circulation Element of the General Plan.
- F. Analyze potential cut-through traffic generated by the project impacting other City neighborhoods.
- G. Pedestrian conditions and bicycle access, including safety issues, should be discussed.

## Significance Criteria for Street segments



H. Analyze project using the requirements outlined in the San Mateo County Congestion Management Plan Land Use Analysis Program guidelines, if applicable.

#### VI. Mitigation

- A. Discuss specific mitigation measures in detail to address significant impacts, which may occur as a result of the addition of project traffic (provide table comparing before and after mitigation). Analysis shall focus on mitigating significant impacts to a non-significant level, but must also identify measures, which would reduce adverse, although not significant, impacts. All feasible and reasonable mitigation requirements that could reduce adverse impacts of the project should be identified, whether or not there are significant impacts caused by the project. The goal of mitigation should be such that there are no net adverse impacts on the circulation Mitigation measures may include roadway improvements, operational network. changes, Transportation Demand Management or Transportation Systems Management measures, or changes in the project. If roadway or other operational measures would not achieve this objective, the consultant shall identify a reduction in the project size, which would with other measures, reduce impacts below the significant level. All mitigation measures must first be discussed with the City Transportation Division before they are included in the report.
- B. Discuss possible mitigation measures to address future traffic conditions with the project. All feasible and reasonable mitigation measures that would reduce such impacts, whether at the significant level or below shall be identified. Mitigation measures should be designed to address the project's share of impacts. Measures that should be jointly required of the project and any other on-going related projects in a related geographical area should also be identified, as applicable.
- C. Discuss possible mitigation measures to address any site circulation or access deficiencies.
- D. Discuss possible mitigation measures to address any parking deficiencies.
- E. Discuss possible mitigation measures to address any impacts on pedestrian amenities, bicycle access, safety and bus/shuttle service.

#### VII. Alternatives

- A. In the event any potentially significant impacts are identified in the Transportation Impact Analysis, alternatives to the proposed project shall be evaluated or considered to determine what the impacts of an alternative project or use might be. The alternatives to be considered shall be determined in consultation with the Director of Community Development and the Transportation Manager.
- VIII. Summary and Conclusions
  - A. Assess level of significance of all identified impacts after mitigation.

Upon receipt by the City of a Transportation Impact Analysis indicating that a project may have potentially significant traffic impacts, the applicant shall have the option of proceeding directly with the preparation of an EIR in accordance with the City's procedures for preparation of an EIR, or requesting a determination by the City Council as to whether a negative declaration, mitigated negative declaration or an EIR is most appropriate for the project.

- 1. The Highway Capacity Manual Special Report 209 (HCM), latest version shall be used for intersection analysis. The consultant shall use the Citywide TRAFFIX model with the HCM analysis.
- 2. The most recent Circulation System Assessment (CSA) shall be used for all information regarding existing and near term conditions.
- 3. Traffic counts that may be required beyond the counts contained in the CSA document shall be less than 6 months old.
- 4. The consultant shall submit proposed assumptions to the Transportation Manager for review and approval prior to commencement of the Analysis relating to the following:
  - 1. trip rates
  - 2. trip distribution
  - 3. trip assignment
  - 4. study intersections
  - 5. roadways to be analyzed
- 4. The consultant shall submit all traffic count sheets to the City's Transportation Division.
- 5. Figures of existing and any proposed intersection configurations should be provided in the appendix.
- 6. Trip generation rates from Institute of Transportation Engineer's (ITE) publication, "TRIP Generation", latest version should be used.
- 7. Street widening and on-street parking removal are mitigation measures which may be technically feasible, but which are generally considered undesirable. If such measures appear potentially appropriate to the consultant, they should consult the Transportation Division in preparing the impact analysis and mitigation recommendations. If such measures are to be proposed, alternate mitigation measures, which would be equally effective, should also be identified.
- 8. Existing uses at the site, which would be removed as part of the project, may be deducted from the calculation of the project traffic based on their traffic distribution patterns.
- 9. Refer to the San Mateo County Congestion Management Program (CMP) Land Use Impact Analysis Program guidelines for performing CMP analysis.

From:	eircomments
To:	Rafat Raie
Date:	7/11/2012 5:30 PM
Subject:	Re: Bay Area Plan EIR Alternatives

Thank you for your comments; they will be considered carefully during the preparation of the Plan Bay Area Environmental Impact Report (EIR). To stay updated on Plan Bay Area and the environmental process, please visit <u>www.onebayarea.org</u>.

Ashley Nguyen, EIR Project Manager Metropolitan Transportation Commission 101 8th Street Oakland, CA 94607 (510) 817-5809

>>> "Rafat Raie" <<u>Raie@walnut-creek.org</u>> 7/11/2012 4:03 PM >>> Dear Ms. Ashley Nguyen,

Please see the attached comment letter. I trust it'll make it to the Board meeting on Friday.

Thanks,

Rafat Raie, P.E.

Traffic Engineer

Re: Oakland Comments on Plan Bay Area EIR NOP

From: eircomments

To: DRanelletti@oaklandnet.com

CC: IStarr@oaklandnet.com; JPLevin@oaklandnet.com; SMiller@oaklandnet.com

BC:

Date: Tuesday - July 10, 2012 11:00 AM

Subject: Re: Oakland Comments on Plan Bay Area EIR NOP

Thank you for your comments; they will be considered carefully during the preparation of the Plan Bay Area Environmental Impact Report (EIR). To stay updated on Plan Bay Area and the environmental process, please visit www.onebayarea.org.

The Metropolitan Transportation Commission 101 8th Street Oakland, CA 94607 (510) 817-5700

>>> "Ranelletti, Darin" 07/09/12 4:07 PM >>> Ashley,

Attached are the City of Oakland's comments on the NOP for the Plan Bay Area EIR. The original is being sent in the mail. I'd be happy to further discuss these with you.

Regards,

Darin Ranelletti

-----

Darin Ranelletti, Planner III

City of Oakland, Planning Division

250 Frank H. Ogawa Plaza, Suite 3315

Oakland, California 94612

510-238-3663 direct phone

510-238-6538 fax

CITY OF OAKLAND



#### DALZIEL BUILDING • 250 FRANK H. OGAWA PLAZA, SUITE 3315 • OAKLAND, CALIFORNIA 94612-2032

Department of Planning, Building and Neighborhood Preservation Planning & Zoning Services Division (510) 238-3941 FAX (510) 238-6538 TDD (510) 238-3254

#### VIA U.S. MAIL AND ELECTRONIC MAIL

July 9, 2012

Ashley Nguyen, EIR Project Manager Metropolitan Transportation Commission Joseph P. Bort MetroCenter 101 Eighth Street Oakland, CA 94607-4700 eircomments@mtc.ca.gov

#### Re: City of Oakland Comments on Notice of Preparation of the Draft Environmental Impact Report for Plan Bay Area

Dear Ms. Nguyen:

Thank you for the opportunity to comment on the Notice of Preparation (NOP) of the Draft Environmental Impact Report for Plan Bay Area. The City of Oakland respectfully submits the following comments.

As you know, SB 375 includes CEQA streamlining provisions to encourage the type of development that will be necessary in order to achieve the state's greenhouse gas reduction goals of AB 32. However, there are many types of projects that will be consistent with the goals and policies of Plan Bay Area that will not qualify for the CEQA streamlining provisions contained in SB 375, including non-residential land use projects (e.g., day care centers, schools, and grocery stores) and transportation projects (e.g., "road diets," bicycle lanes, and pedestrian safety projects), that may cause environmental impacts under current thresholds and evaluation criteria. In order to successfully achieve Plan Bay Area goals it is important that these Plan-supporting projects be encouraged through appropriate evaluation criteria and effective CEQA streamlining. The EIR for Plan Bay Area should study appropriate impact measurement approaches as well as contain measures to reduce the potential environmental impacts of these projects, thereby allowing local agencies to tier off the EIR when approving individual plans or projects.

The City recommends that the Plan and EIR address the following issues in order to reduce potential environmental impacts of Plan-supporting projects that would not qualify for CEQA streamlining under SB 375:

1. <u>Air Quality</u>: Plan Bay Area encourages residential development in areas located near sources of toxic air contaminants, such as near freeways and high-volume roadways. The

Ashley Nguyen, EIR Project Manager Metropolitan Transportation Commission City of Oakland Comments on Notice of Preparation of the Draft Environmental Impact Report for Plan Bay Area July 9, 2012 Page 2

EIR should analyze the environmental impact of locating all new residential development more than 1,000 feet from freeways and high-volume roadways (the local hazard screening distance recommended by the Bay Area Air Quality Management District). The EIR should also identify specific measures to reduce the health risk of project residents located near sources of toxic air contaminants (both mobile and stationary sources) and the health risk to nearby receptors from toxic air contaminants generated by projects during construction.

- 2. <u>Greenhouse Gases and Climate Change</u>: There are a variety of measures available to reduce greenhouse gas (GHG) emissions associated with land use projects. However, many Plan-supporting projects will generate substantial GHG emissions even after incorporation of all feasible GHG-reduction measures. Many of these projects, while generating substantial GHG emissions, are important GHG-reducing projects from a regional perspective because they reduce regional vehicle miles traveled (e.g., commercial/retail projects in central urban locations located closer to consumers). For these projects the Plan Bay Area EIR should contain a provision to establish a regional GHG mitigation bank so that projects generating substantial GHG emissions have the option of contributing to a regional program that would fund GHG-reduction efforts in the larger Bay Area.
- 3. <u>Transportation</u>: Most local agencies rely upon intersection level-of-service (LOS) as a metric for assessing and determining the significance of transportation impacts. However, infill development, transit-oriented development, and transportation projects that support the goals of the Plan often result in significant (and often unavoidable) impacts using this measurement tool. While local agencies would like to consider new tools other than LOS for evaluating potential transportation impacts, such as the auto-trip-generation (ATG) approach being studied by the City of San Francisco, most local agencies do not have the resources to develop the program or to study the environmental impact of switching from LOS to a new tool such as ATG.

For example, one distinct advantage of the ATG approach is that it counts each net new automobile trip as it contributes to environmental impacts, rather than focusing on intersection delay. This approach is more consistent with not only Plan Bay Area, but Oakland's Transit First policy and Bicycle and Pedestrian Master Plans, all of which seek to reduce automobile trips while increasing travel by public transit, bicycle, and walking. ATG, in essence, discourages the construction of new development that results in high auto trips because these projects will require significant mitigation due to their impact on the transportation system, greenhouse gas emissions, and air quality.

Plan Bay Area and the EIR should address this issue in the following ways:

a. Plan Bay Area should establish a model program that local agencies could choose to implement that utilizes a trip-generated tool such as ATG for assessing local transportation impacts. The EIR should evaluate the potential environmental impact

Ashley Nguyen, EIR Project Manager Metropolitan Transportation Commission City of Oakland Comments on Notice of Preparation of the Draft Environmental Impact Report for Plan Bay Area July 9, 2012 Page 3

of using this type of tool so that local agencies could rely upon the EIR when implementing the program locally.

b. Plan Bay Area should also establish an ATG mitigation program to provide a new and more effective way to mitigate the impacts of these added vehicle trips by funding countywide and local area transportation projects designed to address transportation system development and management needs.

Once again, the City of Oakland appreciates the opportunity to comment on the NOP, and looks forward to the EIR providing analysis valuable to Oakland, particularly in the areas of air quality, greenhouse gases, and transportation, as the City strives to satisfy regional and state goals.

Please contact Darin Ranelletti, Planner III, at (510) 238-3663 or dranelletti@oaklandnet.com if you have any questions.

Sincerely,

ot Mill

Scott Miller Interim Planning and Zoning Director Environmental Review Officer

City of Palo Alto

Department of Planning and Community Environment

July 11, 2012

Ms. Ashley Nguyen, EIR Project Manager Metropolitan Transportation Commission Joseph P. Bort MetroCenter 101 Eighth Street Oakland, CA 94607-4700

#### Subject: Response to the Notice of Preparation for Plan Bay Area Draft Environmental Impact Report

Dear Ms. Nguyen:

Thank you for the opportunity to comment on the Notice of Preparation (NOP) for the Plan Bay Area Draft Environmental Impact Report (EIR). As you consider the proposed alternatives to be studied in the EIR on the Preferred Scenario, we strongly urge you to:

- Include a less aggressive and more realistic growth projection scenario.
- A growth projection scenario that reduces greenhouse gas (GHG) more effectively
- An economic feasibility study of all growth projection alternatives.

The City believes that the Preferred Scenario relies on questionable assumptions, with unrealistic and very aggressive housing and jobs projections. A less aggressive alternative growth scenario considering realities of the present and future, including economic trends and limiting constraints such as land cost and availability and infrastructure capacity, should be considered.

As the City has stated in previous comments, the Preferred Scenario should be based on a concept of identifying transit commute sheds in a way that establishes commute thresholds for locating housing nodes and employment centers. This would help to move the concept away from a city-by-city scenario to a more sub-regional approach, allowing job growth where it is most attractive for employers and near transit. Most housing could then be located where available land and costs are more affordable, but facilitating transit, bicycle or pedestrian access from the housing nodes to those employment centers. The Preferred Scenario is not based upon a sub-regional approach for reductions of commute sheds and greenhouse gas reductions, and therefore places an inordinate burden on individual cities.

250 Hamilton Avenue P.O. Box 10250 Palo Alto, CA 94303 650.329.2441 650.329.2154 *Ms. Ashley Nguyen, EIR Project Manager Metropolitan Transportation Commission July 11, 2012 Page 2 of 2* 

The City believes that an additional, hybrid-type alternative should be analyzed in the EIR that would achieve similar GHG reductions based upon a more realistic employment and housing growth scenario. This alternative could be based on *Alternative 3- Lower Concentrations of PDA Growth* which focuses growth on the Priority Development Areas (PDA) as well as other transit-rich areas not identified in the PDA process and *Alternative 1- No Project*, which is focused on what can reasonably be expected based on current plans and consistent with existing infrastructure. Growth in the PDAs would be of lower concentration than in *Alternative 2- Jobs-Housing Connection* and would acknowledge adopted local and regional plans, including more realistic growth projections based on historic patterns similar to what is described in the Outward Growth Scenario. This proposed hybrid alternative would, in our opinion, result in a more realistic and sub-regional focused plan that could achieve similar GHG reductions.

Thank you for your consideration of the above comments and suggestions. The City looks forward to our continued participation in the EIR process.

Sincerely,

to Williams

Curtis Williams Director Department of Planning and Community Environment

 cc: Ezra Rapport, Executive Director, Association of Bay Area Governments Ken Kirkey, Planning Director, Association of Bay Area Governments Palo Alto City Council Planning and Transportation Commission James Keene, City Manager

From:	Ashley Nguyen
To:	Brenda Dix; Stefanie Hom
Date:	7/9/2012 3:42 PM
Subject:	Fwd: Question/Comment Bay Area Plan NOP

Pls see attached. Collect, compile, and forward to Hannah.

Ashley Nguyen Senior Transportation Planner/Analyst Metropolitan Transportation Commission 101 Eighth Street | Oakland, CA 94607 Tel. 510.817.5809 | Fax 510.817.5848

>>> "Walton, Susan" <Susan.Walton@sanjoseca.gov> 7/6/2012 11:48 AM >>>

Ashley-

In discussions with Planning and other department staff in the City of San Jose reviewing the NOP for the One Bay Area Plan, we're interested in the CEQA Key Impact Category listed under <u>Transportation</u> on Page 8, "Potential decrease in the average number of jobs within 15, 30, 45 minutes of home by auto or transit". How is this an impact category, as it seems to be a proxy somehow for commute share by transit or auto except that it groups those modes together? How is the job numbers "from home" measured? For each dwelling unit? For each employed resident? From the job end? Also, what is prompting the proposed measure as a potential <u>decrease</u>? Wouldn't that be because of its impact on VMT/VHT?

We would appreciate some clarification on this Impact Category.. the others are fairly straightforward.

Thank you for any information.

Susan Walton Principal Planner, City of San Jose



COMMUNITY DEVELOPMENT DEPARTMENT PHONE: 415-485-3085 FAX: 415-485-3184

July 9, 2012

Metropolitan Transportation Commission & Association of Bay Area Governments Joseph P. Bort MetroCenter 101 Eighth Street Oakland, CA 94607-4700 Attn: Ashley Nguyen, EIR Project Manager

## Subject: Notice of Preparation of an Environmental Impact Report for Plan Bay Area (SCS)

Dear Ms. Nguyen:

Thank you for the opportunity to comment on the Notice of Preparation (NOP) that has been published for the Plan Bay Area (SCS) project. To date, the City of San Rafael has participated in and commented on the various phases of Plan Bay Area and realize the importance of the Environmental Impact Report (EIR) that will provide CEQA review of this regional plan. After carefully reviewing the NOP, we offer the following comments, questions and requests:

#### A. <u>Purpose and Intent of "Program EIR"</u>

As stated in the NOP, it is the intent of ABAG/MTC to prepare and certify a Program EIR that will be suitable for "tiering," meaning that local jurisdictions may use this EIR in preparing second-tiered environmental documents covering specific land use projects and local plans. The intent to prepare a Program EIR that can be used for some level of tiering by local jurisdictions has good intent. However, it is unclear how much tiering value this EIR will provide to local jurisdictions as most impacts that are being assessed are at a very high, regional level. In our review of the NOP, we believe that the tiering value of the Plan Bay Area Program EIR will be limited to the analyses of cumulative impacts, air quality/greenhouse gas emissions and alternatives only. The EIR will need to provide a detailed explanation on the purpose, intent and use of this Program EIR.

One of the advantages of designating a Priority Development Area (PDA) is that land development within the PDA would be subject to a more streamlined environmental review and CEQA process. This goal is prescribed by SB375 particularly relating to "residential/mixed-use residential projects" and "transit priority projects" in PDAs. However, it is unclear how the Plan Bay Area Program EIR will achieve this goal. While the NOP states that input will be solicited from local jurisdictions, there is no explanation or discussion as to how or if the Program EIR will provide a higher or more detailed level of environmental analysis for PDAs, so that local CEQA review can effectively be streamlined. It is likely that there may be pressure placed on local jurisdictions to rely on

the Plan Bay Area Program EIR to streamline local CEQA review for development projects that are within PDAs. For this reason, the purpose of this Program EIR for PDA CEQA coverage and/or clearance is critical and must be clearly explained in the EIR.

#### B. <u>No Initial Study Prepared</u>

Per CEQA Guidelines Section 15060(d), no Initial Study is required if the lead agency determines that an EIR "will be clearly required for the project." It is apparent that ABAG/MTC has taken this approach as the NOP is not accompanied by nor is there reference to an Initial Study. The approach of "skipping" the preparation of an Initial Study is typically employed when it is determined that a full EIR, rather than a focused EIR will be prepared. It is unclear if ABAG/MTC intends on preparing a focused EIR or if all of the topic areas in the Initial Study Checklist will be studied and included in the EIR. Since pages 8-10 of the NOP provide a list of selective topic areas to be studied, it appears that the EIR scope will be focused. If this is correct, please explain how all other topic areas in the Initial Study Checklist (CEQA Appendix G: Environmental Checklist Form) will be addressed. For topic areas that are not to be studied, substantial evidence must be provided to demonstrate that there will be either no impact or, at most, less-than-significant impacts in these areas. For this reason, it is recommended that the Program EIR address and assess all topic areas in the Initial Study Checklist.

#### C. <u>Comments on Topic Areas of Study Listed in NOP</u>

Since no Initial Study has been prepared with this NOP, it is difficult to understand and determine the depth of study that will be conducted for the selected topic areas (NOP pages 8-10). How much local data or study will be solicited from local jurisdictions to assist in the analysis of the topic areas? Below, please find our recommendations for an expanded scope of study:

1. <u>*Transportation*</u>. The Program EIR should address and assess the following:

- a. An understanding of the local transportation network. Will the planning policies and programs adopted by local jurisdictions be considered to ensure that the local circulation system will continue to effectively perform? The jobs and housing growth that is projected by the Plan Bay Area is substantial and it is unclear how the local effects of this projected growth will be assessed at a program-level.
- b. The county-level congestion management plans (CMP). Any activity or action that has the potential to conflict with an adopted CMP would result in a potentially significant environmental impact. This potential impact is particularly critical if the CMP includes level of service standards and travel demand measures that have been adopted by local jurisdictions.
- c. The potential for increase in traffic hazards due to changes in land use that may be incompatible. The jobs and housing growth that is projected by the Plan Bay Area will introduce and promote increased potential for development and changes in land use, which will increase the number of pedestrians, cyclists and vehicles in concentrated areas. This change has the potential to create conflicts, thus resulting in an increase in hazards.

d. Maintaining adequate emergency access. Increased and concentrated growth has the potential to impact or impair emergency access.

Please explain how the above items will be addressed and assessed in this Program EIR. Further, the Program EIR should include mitigation measures for addressing potential traffic hazards or impaired emergency access that can be standardized for application at a local jurisdiction level.

- 2. <u>Air Quality</u>. The Program EIR must identify and assess potential conflicts with State-adopted policies or regulations intended to protect sensitive receptors from exposure to elevated particulates. The jobs and housing growth that is projected by the Plan Bay Area is purposely concentrated around areas of transit and transportation, which are typically near sources of concentrated air pollutants (freeways/highways). Historically, the State of California Air Resources Board (CARB) has discouraged housing (as a sensitive receptor) within 500 feet of a concentrated air pollutant source. If this CARB policy is still enforced, it should be addressed in the Program EIR as a potential conflict with the project.
- 3. <u>Land Use</u>. The NOP provides no discussion of how or if the Program EIR will address or assess the following:
  - a. The potential to physically divide an established community. One of the key components of the Plan Bay Area is the protection of agricultural and open space resources (Priority Conservation Areas). This component coupled with the goal and intent to concentrate future jobs and housing growth will naturally facilitate a divide between the urban community and the rural community. As a result, a beneficial impact may be realized, which should be acknowledged and considered in the Program EIR. Further, the Program EIR should include mitigation measures or perhaps standards that provide GHG emissions reduction credit to local jurisdictions that protect open space and agricultural lands in association with Plan Bay Area implementation (incentive-based mitigation).
  - b. The potential for conflict with land use policies or regulations that are intended to avoid or mitigate an environmental effect. At a local jurisdiction level, many communities have adopted policies and ordinances that are intended to protect, among others, the character of a community, such as community scale. Local jurisdictions commonly protect community scale through measures such as limits on building heights and floor area ratios. The Plan Bay Area projects jobs and housing growth that could be in conflict with locally-adopted policies and regulations that are intended to protect community character. Please explain how this potentially significant impact will be addressed.

There is no mention in the NOP about the relationship between the Plan Bay Area and the San Francisco Bay Plan (Bay Plan), which was recently amended by BCDC. As BCDC is a partner agency in the Plan Bay Area effort, it is expected that the project will be reviewed for consistency (and any potential conflict) with the adopted Bay Plan. One potential conflict is with the issue of sea level rise. The recent amendments to the Bay Plan largely focus on long-range planning for predicted sea level rise. ASHLEY NGUYEN, MTC JULY 9, 2012 PAGE 4

> One of the key goals of the Plan Bay Area is to concentrate jobs and housing growth in the developed, urban centers that are around and near mass and public transit. In the Bay Area, many (if not most) of the urban centers are in flat, low-lying areas that are close to the Bay; these areas will be impacted (some dramatically) by sea level rise. The Program EIR should include mitigation measures that provide guidance or standards to local jurisdictions in addressing (or planning for) sea level rise in the planned growth areas.

- 4. <u>Greenhouse Gas (GHG) Emissions</u>. The NOP provides no discussion of how or if the Program EIR will address or assess the following:
  - a. The project's relationship with the Bay Area Air Quality Management District's Bay Area 2010 Clean Air Plan. While a legal challenge of the adopted standards and thresholds for assessing GHG emissions is pending, the Program EIR will need to address how GHG emissions are quantified and the thresholds that are being used to determine a significant environmental impact.
  - b. The project's relationship with locally-adopted climate change plans. Like many Bay Area communities, San Rafael has adopted a Climate Change Action Plan (CCAP) and an accompanying GHG Emissions Reduction Strategy. These adopted documents address our local commitment to implement specific actions and measures to reduce GHG emissions for 2020 and 2035. These actions and measures include, among others:
    - 1. Improving the pedestrian/bicycle infrastructure; promoting transient-oriented development (TODs);
    - 2. Supporting transit services such as the Sonoma-Marin Rail Transit (SMART);
    - Completion of two SMART Station Area Plans, which promote increased densities/intensities abutting rails stations, as well as increasing the performance and safety of public transit, bicycle and pedestrian facilities;
    - 4. A commitment to participate in the local Marin Energy Authority (MEA) alternative to conventional PG &E service. MEA offers renewable energy with service options at several levels, light green and dark green. San Rafael has committed to receive the MEA light green service option with a later, more aggressive commitment for the dark green service option by 2020; and
    - 5. The adoption of a Zero Waste Plan, developing a Residential Food Waste Composting Program, and measures for promoting electrical vehicle purchase and use.

With the implementation of these measures, our GHG Emissions Reduction Strategy estimates that our annual emissions can be reduced by as much as 56,858 MTCO2e by 2020 and 78,382 MTCO2e by 2035. The Program EIR should include mitigation measures that provide credit to local jurisdictions that commit to this level of action to reduce GHG emissions (incentive-based mitigation).

- 5. <u>Water Resources</u>. The Program EIR should address and assess the following: a. The anticipated change in the FEMA flood control maps. The FEMA flood control maps are being updated to address and account for predicted sea level rise. The map changes are expected to raise the flood control standards and elevation requirements for buildings and levees. As discussed above, the Program EIR should include mitigation measures that provide local jurisdictions with guidance and/or standards to address (or plan for) sea level rise in the planned growth areas.
  - b. Changes to the State-mandated water quality runoff standards are in-theworks, which are expected to be considerably more stringent than the current NPDES standards. The treatment of runoff from urban development can be difficult and challenging. As the Plan Bay Area proposes to increase jobs and housing growth in the inner-urban areas, the Program EIR should include standardized mitigation measures for treating runoff from higher density, more intense urban development that can be implemented or adapted at a local jurisdiction level.
- 6. <u>Visual Resources</u>. The topic of visual resources is listed for study in the NOP. However, given that the environmental document is being prepared as a Program EIR for the region, it is difficult to understand how visual resources will be assessed and how the assessment will be useful for CEQA "tiering" by local jurisdictions. Specifically, scenic vistas and scenic resources within a scenic highway are locally defined and will vary in each community. Further, assessing the degradation of existing visual character can be subjective so the level of impact will vary in each community. Please clarify and/or explain how this topic area will be analyzed.
- 7. <u>Cultural Resources</u>. Although cultural resources are defined by the CEQA Guidelines, it is difficult to understand how this topic will be assessed in this Program EIR to make for useful "tiering" by local jurisdictions. Please clarify and/or explain how cultural resources will be analyzed. Many of the urban centers of the inner-Bay Area are situated in older, developed areas which typically have the highest concentration of historic and archaeological resources. If increased jobs and housing is projected for these older areas, pressure will be placed on the demolition of older buildings/areas that meet the CEQA criteria as a historic resource. Therefore, the Program EIR needs to address this challenge and perhaps provide guidance on how this topic can be studied and mitigated at the second-tier level by local jurisdictions.

Please keep in mind that the State of California Department of Historic Preservation will advise that the demolition of a historic resource cannot be fully mitigated, meaning that a significant, unavoidable impact is inevitable. This fact should be considered in the preparation of the Program EIR, as local jurisdictions might value this EIR finding for "tiering" purposes.

8. <u>Public Utilities</u>. We are pleased to see that public utilities will be addressed and studied in this Program EIR. Regarding water supply and service, some counties in the Bay Area are more sustainable in that they source and supply water supply from within the county. The transport of water supply from outside sources has

the potential to generate and increase GHG emissions. Therefore, the Program EIR should include mitigation measures and/or performance standards that credit those counties that practice and implement a sustainable water supply service (incentive-based mitigation).

#### D. <u>Request to Study Topic Areas Not Listed in NOP</u> The following topic areas should be considered for study in the Program EIR:

- 1. <u>Hazards and Hazardous Materials</u>. Hazardous materials should be assessed at a program level. Many of the urban centers of the inner-Bay Area are situated in older areas that have been historically developed with non-residential land uses. Contaminated soil and groundwater is typically encountered in these older areas, which creates challenges, if not impediments to land use planning, particularly planning for suitable housing sites.
- 2. <u>Public Services</u>. As is the case with public utilities, public services should be assessed at a program level. The projected jobs and housing growth will have a significant impact on local-level and countywide public services and facilities including, but not limited to fire, police and public works.
- 4. <u>Recreation</u>. Impacts on public recreation facilities and uses should be assessed at a program level. The projected housing growth of 660,000 housing units by 2040 will have a significant impact on the use of and demand on neighborhood, community and regional parks.
- 5. <u>Noise</u>. As is the case with air quality impacts, the jobs and housing growth that is projected by the Plan Bay Area is purposely concentrated around areas of transit and transportation, which are typically near sources of noise. Noise impacts should be assessed at a program level.

#### E. <u>Comments on Alternatives to be Studied</u>

- 1. As Alternative 2 (Jobs-Housing Connection) is the project, it is should not be classified or assessed as an alternative in this Program EIR.
- 2. The scope of Alternative 4 (Eliminating Inter-Regional Commuting) would analyze and test the elimination of in-commuting from neighborhood regions. While creative, this aggressive approach does not appear to be realistic. CEQA Guidelines Section 15126.6(a) states that an EIR include a range of *reasonable* alternatives that would *feasibly attain* most of the project objectives but would avoid or potentially lessen any of the significant effects of the project. While this alternative may meet the project objectives and could conceivably reduce or eliminate significant effects of the project, it does not appear to be feasible.
- 3. The State of California Department of Finance (DOF) recently published (May 2012) population forecasts, which are lower than the ABAG growth assumptions. An EIR alternative should be included that uses these recent DOF forecasts (lower rate of employment and residential growth).
- 4. A "local plans" alternative should be included and assessed in the EIR.

ASHLEY NGUYEN, MTC JULY 9, 2012 PAGE 7

Again, thank you for the opportunity to comment on the Plan Bay Area NOP. If you have any questions regarding the comments in this letter, please feel free to contact me at 415.485.5064 or at paul.jensen@citvofsanrafael.org.

Sincerely,

Paul a. Jusin

Paul A. Jensen, AICP CITY OF SAN RAFAEL Community Development Director

cc: Mayor Phillips and City Council Planning Commission City Manager City Attorney Economic Development Department Transportation Authority of Marin Planning Manager

SCS.NOP\_cmnt ltr\_7 9 12

From:	eircomments
To:	Tyra Hays
CC:	Fred Buderi; Maureen Carson
Date:	7/11/2012 5:29 PM
Subject:	Re: City of Vacaville Comments to the NOP for the Draft EIR for the Plan Bay Area Plan

Thank you for your comments; they will be considered carefully during the preparation of the Plan Bay Area Environmental Impact Report (EIR). To stay updated on Plan Bay Area and the environmental process, please visit <u>www.onebayarea.org</u>.

Ashley Nguyen, EIR Project Manager Metropolitan Transportation Commission 101 8th Street Oakland, CA 94607 (510) 817-5809

>>> "Tyra Hays" <<u>thays@cityofvacaville.com</u>> 7/11/2012 4:07 PM >>> Good Day Ms. Nguyen.

Attached is the City of Vacaville's comments pertaining to Notice of Preparation for the Environmental Impact Report for the Plan Bay Area Jobs-Housing Connection Strategy.

Please do not hesitate to contact me if you have any questions pertaining to our comments.

Thank You,

Tyra Hays

Senior Planner / General Plan Update Project Manager

City of Vacaville

650 Merchant Street

Vacaville, CA 95688

707 449-5366



## CITY OF VACAVILLE

650 MERCHANT STREET VACAVILLE, CALIFORNIA 95688-6908 www.cityofvacaville.com

ESTABLISHED 1850

#### STEVE HARDY Mayor

**DILENNA HARRIS** Councilmember

RON ROWLETT CURTIS HUNT Vice Mayor

Councilmember

MITCH MASHBURN Councilmember

#### **Community Development Department** (707) 449-5140

July 11, 2012

Ashley Nguyen, EIR Project Manager Metropolitan Transportation Commission Joseph P. Bort MetroCenter **101 Eighth Street** Oakland, CA 94607-4700

Via Email: eircomments@mtc.ca.gov

#### SUBJECT: Notice of Preparation of a Draft Environmental Impact Report for Plan Bay Area Jobs-Housing Connection Strategy

Dear Ms. Nguyen:

Thank you for the opportunity to provide comments regarding the Notice of Preparation for the Draft Environmental Impact Report (EIR) for Plan Bay Area Jobs-Housing Connection Strategy (Strategy). It is our understanding that the Jobs-Housing Connection Strategy (revised May 16, 2012) will be evaluated in the EIR. As an agency with statutory responsibilities in connection with the project being evaluated, we offer you the following comments:

1. The City appreciates MTC's and ABAG's efforts in the Plan Bay Area Strategy to model land use scenarios that would result in a significant reduction in vehicle miles traveled and a reduction in carbon emissions. However, the reductions are based on unlikely assumptions for suburban communities like Vacaville.

As stated in the Strategy (pg. 55), "The Jobs-Housing Connection growth strategy is a major departure from the dispersed growth patterns of prior decades." For nearly three decades, ABAG Projections identified Vacaville, and Solano County as a whole, as having a significant share of the Bay Area's economic and residential development. Local growth policy has been consistent with those aggressive growth projections, and the existing Vacaville General Plan has an abundant supply of land awaiting development - much of it already with legally abiding development agreements and entitlements. It is not practical to assume that this local policy will be abruptly reversed in response to the Strategy.

The City of Vacaville requests that the EIR include an alternative that evaluates the potential impacts to communities with financial commitments to infrastructure to support past ABAG economic and residential growth projections. In addition, the EIR should

evaluate potential impacts to communities with land use policy commitments in place that do not conform with the growth patterns identified in the Strategy.

- 2. The Strategy focuses on evaluating employment distribution in communities linked to the "region's core transit network," specifically San Francisco, San Mateo, Santa Clara and Alameda counties. However, the Strategy also acknowledges Eastern Contra Costa and Solano Counties contain "communities of concern" where communities are becoming increasingly isolated from living wage job opportunities. Based on this information, we believe residents of these communities will continue to commute to the core of the Bay Area. This continued commuting pattern will not support the Strategy's goal of reducing vehicle miles traveled and reduced carbon emissions. The City of Vacaville requests that the EIR evaluate the following:
  - a. An analysis of how the proposed Strategy would financially impact communities of concern, thus leading to potentially significant environmental effects in those communities.
  - b. An alternative that places employment centers in Eastern Contra Costa and Solano Counties, thereby resulting in reduced vehicular miles traveled and carbon emissions in Vacaville and our subregion.
  - c. Can the core of the Bay Area provide affordable housing near the employment centers to meet the goal of the Strategy to reduce vehicular miles traveled and carbon emissions? The EIR should address the feasibility of the core Bay Area providing adequate affordable housing for employees and the environmental effects resulting from any lack of housing opportunities.
- 3. The Strategy states that the 2014-2022 RHNA will allocate as much as 80% of new housing into Priority Development Areas (PDAs), which will trigger rezoning in many jurisdictions to comply with this allocation. Vacaville has been approved by ABAG for two PDAs where high density residential, transit-oriented development is a future priority. Ideally, the City believes these areas could cumulatively accommodate up to 500 units. ABAG's draft RHNA numbers, dated May 10, 2012, prescribe 1,082 units to Vacaville. It is not reasonable to believe the majority of the RHNA units will be located within Vacaville's two PDAs during the timeframe of the next Housing Element based on existing land use patterns, infrastructure limitations in the surrounding areas, and the dissolution of the Redevelopment Agency, which provided funding incentives for infrastructure and affordable housing. This is cause for great concern for Vacaville since the Strategy proposes to link transportation funding to PDAs. Therefore, the EIR should include mitigation measures that provide resources for local jurisdictions to help meet these housing goals.
- 4. The City is concerned about the lasting impacts to transportation funding for Vacaville and Solano County if the proposed Strategy is adopted. Vacaville requests that further information be provided to address how SCS projections will be implemented, and how this implementation would impact allocation of transportation funding. Consideration is needed regarding how local jurisdictions are to resolve inconsistencies with current planning policies and entitled projects that are consistent with past ABAG projections but which may be inconsistent with new ABAG projections.

To summarize, the proposed Strategy has potential negative consequences to Vacaville in terms of future economic development, job growth for existing residents and devaluation of both public and private investments. It is important to our region that land use and transportation decisions be made in consideration of the future environment. However, regional decisions cannot be made with disregard to existing local land use policies, which were implemented consistent with past regional ABAG forecasts.

If you have any questions regarding our comments, please direct them to Senior Planner/General Plan Update Manager Tyra Hays at (707) 449-5366 or thays@cityofvacaville.com or to me at (707) 449-5361 or mcarson@cityofvacaville.com.

Sincerely,

Mauri annon

Maureen T. Carson Community Development Director

From:	eircomments
To:	Rafat Raie
Date:	7/11/2012 5:30 PM
Subject:	Re: Bay Area Plan EIR Alternatives

Thank you for your comments; they will be considered carefully during the preparation of the Plan Bay Area Environmental Impact Report (EIR). To stay updated on Plan Bay Area and the environmental process, please visit <u>www.onebayarea.org</u>.

Ashley Nguyen, EIR Project Manager Metropolitan Transportation Commission 101 8th Street Oakland, CA 94607 (510) 817-5809

>>> "Rafat Raie" <<u>Raie@walnut-creek.org</u>> 7/11/2012 4:03 PM >>> Dear Ms. Ashley Nguyen,

Please see the attached comment letter. I trust it'll make it to the Board meeting on Friday.

Thanks,

Rafat Raie, P.E.

Traffic Engineer



July 11, 2012

Ashley Nguyen, EIR Project Manager Metropolitan Transportation Commission 101 Eighth Street Oakland, CA 94607 Email: <u>eircomments@mtc.ca.gov</u> Fax: 510.817.5848

Subject: Bay Area Plan EIR Alternatives

Dear Ms. Ashley,

Thank you for giving the City of Walnut Creek an opportunity to comment on the EIR Alternatives Memorandum dated July 9, 2012. It is easy to see the amount of work and concentrated thoughts that went into drafting alternatives for a very complex puzzle.

Our comments are related to Alternatives Three and Five. As an agency that continues to benefit from fined tuned and well-functioning arterials, we neither understand nor support the targeting of the arterial signal coordination funds. It does not make any sense to let the arterials deteriorate and improve transit since transit has to use the arterials as well. A similar flaw is in Alternative Five where the environment is the focus. The arterial operation measures have the best cost-to-benefit ratios when compared to other measures. A quick audit of the Arterial Signal Coordination Program track record will show a series of success stories (at least sixty agencies) and a great targeted investment of public funds. Directing these funds to benefit two agencies and to increase funding to AC Transit and BART is not equitable. The investment in arterial operation benefits all modes and has been the most effective for the last 30 years.

During the last five years many technologies were introduced to the traffic industry. These technologies are essential to the growing needs for efficient mobility. Taking the funds out of arterials operation will set the nine Bay Area Counties far behind in traffic management.

We strongly suggest that you reconsider cutting arterial operations funding, which has consistently shown to support the goals of Plan Bay Area.

Sincerely 110

Rafat Raie, P.E. Traffic Engineer

From:	eircomments
То:	Alice Kaufman
Date:	7/11/2012 5:16 PM
Subject:	Re: Commitee for Green Foothills comment letter re Plan Bay Area NOP

Thank you for your comments; they will be considered carefully during the preparation of the Plan Bay Area Environmental Impact Report (EIR). To stay updated on Plan Bay Area and the environmental process, please visit <u>www.onebayarea.org</u>.

Ashley Nguyen, EIR Project Manager Metropolitan Transportation Commission 101 8th Street Oakland, CA 94607 (510) 817-5809

>>> "Alice Kaufman" <<u>alice@greenfoothills.org</u>> 7/11/2012 11:31 AM >>> Dear Ms. Nguyen,

Attached is Committee for Green Foothills' comments on the Notice of Preparation of the Draft Environmental Impact Report for Plan Bay Area.

Please let me know if you have any questions.

Alice Kaufman

Legislative Advocate, Committee for Green Foothills

650-968-7243 x. 313

www.greenfoothills.org



July 11, 2012

Ashley Nguyen, EIR Project Manager Metropolitan Transportation Commission Joseph P. Bort MetroCenter 101 Eighth Street Oakland, CA 94607-4700 <u>eircomments@mtc.ca.gov</u>

Re: Notice of Preparation of Draft Environmental Impact Report for Plan Bay Area

#### Dear Ms. Nguyen,

The Committee for Green Foothills (CGF) submits these comments on the Notice of Preparation of Draft Environmental Impact Report for Plan Bay Area. CGF is a regional organization whose mission is to protect open space and natural resources in San Mateo and Santa Clara Counties. As an environmental organization, we applaud the Plan's efforts to achieve the reduction in greenhouse gases established by SB 375. However, we have certain concerns about the impacts of the Plan on other environmental values such as open space, biological resources, agricultural resources, and recreational values.

#### Plan Bay Area, while encouraging growth in PDAs, does not discourage it elsewhere.

The Plan's incentives encouraging development in Priority Development Areas (PDAs) are not counterbalanced by restrictions or discouragement of development in other areas. Although the Plan will act to shift some amount of growth towards urban centers and transit corridors, with no actual limitations on development outside of PDAs, significant development will still occur. A landowner who wishes to profit from developing his land may be disappointed if it is not located in a PDA, but it will not deter him from development if the profits outweigh the costs. Thus, the net result of the Plan may well be an increase in overall growth in absolute terms, with resultant impacts on greenhouse gases, traffic, air quality, water supply, etc. These impacts must be evaluated in the EIR, and mitigation measures included, such as policies to discourage growth in areas with limited access to public transit and located at a distance from jobs centers.

#### Plan Bay Area contains no protections for urban open space or "greenfields."

Open space is not located only in Priority Conservation Areas (PCAs), or even only outside of urban boundaries. Significant open space exists within city limits and spheres of influence in San Mateo and Santa Clara Counties, and often provides valuable agricultural, recreational or wildlife resources. These open space parcels, often called "greenfields," are frequently at high risk of development due to their location. Developers may attempt to characterize them as "infill" and thus win development approval by seeming to fulfill environmental goals. Examples of such parcels are the Cargill Saltworks site in Redwood City, Coyote Valley in San Jose, and the Southeast Quadrant in Morgan Hill.

Plan Bay Area, in spite of its stated goal of protecting open space, agricultural land, and the natural environment, offers no protections for <u>any</u> undeveloped land other than the Priority Conservation Areas, which are limited in number. Loss of urban open space will result in aesthetic and biological impacts as well as impacts to recreational resources and loss of agricultural land, which must be characterized and mitigated in the EIR.

#### The EIR should examine impacts to creeks and water quality.

Increased density in urban areas may result in increased impacts to urban creeks and rivers. For example, San Jose is experiencing an increase in homeless encampments in riparian corridors because creek beds are often the only secluded areas in the urban environment. Increased density will exacerbate this issue, and these encampments are associated with litter and other degradation to water quality and creek environment.

#### Plan Bay Area's expectation of funding from New Start should be subject to further review.

The federal New Start funding program has strict requirements with regard to cost and density, as was discovered in the recent BART extension to San Jose, where funding was not obtainable when the project anticipated extending the line to downtown San Jose, and was only made available when the project was revised to end the line in Berryessa. Before any assumptions are made about the likelihood of funding from the New Start program, careful analysis should be made.

#### Plan Bay Area should consider incentives for low-income transit takers.

Many businesses that formerly offered transportation programs including subsidized transit passes are reducing or eliminating these programs due to unmaintainable cost in the current economy. The Plan should consider financial incentives to support these programs, or alternatively, financial incentives directly to low-income transit takers to ensure continued ridership.

Thank you for your consideration of these comments. Please contact us if you have any questions.

Sincerely,

Mid the

Alice Kaufman Legislative Advocate, Committee for Green Foothills

From:	eircomments
To:	Jamar Stamps
Date:	7/11/2012 5:55 PM
Subject:	Re: Notice of Preparation of a Draft Environmental Impact Report for Plan Bay Area

Thank you for your comments; they will be considered carefully during the preparation of the Plan Bay Area Environmental Impact Report (EIR). To stay updated on Plan Bay Area and the environmental process, please visit <u>www.onebayarea.org</u>.

Ashley Nguyen, EIR Project Manager Metropolitan Transportation Commission 101 8th Street Oakland, CA 94607 (510) 817-5809

>>> Jamar Stamps <<u>Jamar.Stamps@dcd.cccounty.us</u>> 7/11/2012 5:49 PM >>> To: Ashley Nguyen, EIR Project Manager Metropolitan Transportation Commission

My comments on the above captioned item are attached.

Thank you.

Jamar I. Stamps, Planner Contra Costa County Department of Conservation & Development Transportation Planning Section 30 Muir Rd., 2nd Floor Martinez, CA. 94553-4601 (925) 674-7832 (925) 674-7258 FAX

## Department of Conservation & Development

30 Muir Road Martinez, CA 94553-4601

Phone: 925-674-7832

# Contra Costa County

Catherine Kutsuris Director

Aruna Bhat Deputy Director Community Development Division

Jason Crapo Deputy Director Building Inspection Division

**Steven Goetz** Deputy Director Transportation, Conservation and Redevelopment Programs

July 11, 2012

Ashley Nguyen, EIR Project Manager Metropolitan Transportation Commission Joseph P. Bort MetroCenter 101 Eight Street Oakland, CA 94607-4700

### RE: Notice of Preparation of a Draft Environmental Impact Report for Plan Bay Area

Dear Ms. Nguyen:

Thank you for providing the opportunity to comment on the Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) for Plan Bay Area. Contra Costa County, Department of Conservation and Development staff would like to provide the following response to the NOP.

- 1. Plan Bay Area intends to use CEQA Exemptions as an incentive to develop transit-oriented residential development projects. While County staff understands the intent, it could also be problematic in the sense that untold impacts to existing transportation facilities and public services will not be disclosed during project level review, and jeopardize local growth management policies. This DEIR should disclose the significant impacts of a project, even in the instance an exemption is granted for that project. Additionally, this information included into the official record would be helpful if remediation is required in the future as a result of a CEQA exempt project.
- 2. SB 375 authorizes the adoption of traffic mitigation measures that apply to transit priority projects. Will this mitigation measures be included in the DEIR?
- 3. The DEIR should provide a "Transit Priority Project-eligible" map of each individual county to make the Priority Development Areas (PDAs) and Transit Priority Project (TPP) areas more distinguishable.
- 4. The DEIR should discuss how the preferred scenario would impact, or incorporate, the strategies in existing freeway corridor system management plans prepared under the Freeway Performance Initiative.
- 5. The NOP states that a "key impact area" for the DEIR would include analysis of the "potential decrease in the average number of jobs within 15, 30, or 45 minutes from home by auto or transit." This analysis should also discuss impacts to low-income and minority residents as a result of these potential changes.

- 6. Another "key impact area" the NOP describes has to do with the "potential conversion of agricultural lands and open space to non-agricultural use...conflict with locally adopted land use plans, general plans and zoning." The DEIR should include in the analysis of locally adopted land use plans and impacts to urban growth boundaries. For Contra Costa County this would be our Measure L voter-approved Urban Limit Line (ULL). Plan Bay Area intends to connect infrastructure investments to increased housing and job opportunities in less "urban" areas that may affect certain parts of Eastern Contra Costa County.
- 7. The DEIR should discuss and evaluate potential impacts Bay Area counties may experience from neighboring regions (San Joaquin, Sacramento, Yolo, etc.), and the preferred scenario's compatibility with the sustainable community strategies of those regions. The analysis should also discuss trip generation from these neighboring regions due to jobs and housing growth within the Bay Area, and the implications it may have on our regional highway/roadway infrastructure system. Specifically, we would like the analysis to include an evaluation of the future operation of roads that connect the Bay Area to these adjoining regions.

If you have any questions regarding the above comments please do not hesitate to contact me at the above telephone number, or e-mail me at <u>jamar.stamps@dcd.cccounty.us</u>. Again, thank you for the opportunity to comment on the NOP for the DEIR. The County looks forward to being involved in the review of future environmental documents.

Sincerely,

tengo

Jamar Stamps Transportation Planning Section

G:\Transportation\J. Stamps\MTC\SCS\NOP Comments 7-11-12.doc

## contra costa transportation authority

Joseph P. Bort MetroCenter

Oakland, CA 94607-4700

101 Eighth Street

July 5, 2012

COMMISSIONERS

Don Tatzin, Chair

Janet Abelson, Vice Chair

Genoveva Callowav

David Durant

Jim Frazier

Federal Glover

Dave Hudson

Karen Mitchoff

Julie Pierce

Karen Stepper

Robert Taylor

Randell H. Iwasaki, Executive Director

2999 Oak Road Suite 100 Walnut Creek CA 94597 PHONE: 925.256.4700 FAX: 925.256.4701 www.ccta.net

#### Subject: Notice of Preparation of a Draft Environmental Impact Report for Plan

**Bay Area** Dear Ms. Nguyen:

Ashley Nguyen, EIR Project Manager

Metropolitan Transportation Commission

Thank you for the opportunity to comment on the Notice of Preparation (NOP) for the Draft Environmental Impact Report (EIR) for Plan Bay Area, also known as the 2013 Regional Transportation Plan (RTP). The scope of this EIR is especially important since it is the first RTP that includes a Sustainable Communities Strategy (SCS) as called for in SB 375.

We have four main concerns:

1. The EIR should not assume that the Urban Limit Line in Contra Costa and other counties is "loose"

The NOP, on page 13, notes that Alternative 3, Lower Concentrations of PDA Growth, "assumes tighter compliance of adopted urban growth boundaries (or similar urban service or limit lines) as defined by local jurisdictions as a means to further constrain greenfield development" than Alternative 2, Jobs-Housing Connection, which is the Proposed Project. In addition, in its PowerPoint presentation on the EIR, MTC staff notes that the No Project alternative will "Assume loose compliance with urban growth boundaries -> more greenfield development."

The Authority believes that MTC and ABAG should not assume that locally adopted urban growth boundaries, such as the Urban Limit Line that is in place in Contra Costa and a key requirement of the Measure J Growth Management Program, is not "tight" in any of the alternatives.

2. The UrbanSIM model is untried and its use is thus premature

MTC proposes to use the UrbanSIM model to reallocate jobs and households based on the results of travel forecasts, and to use those

Ashley Nguyen July 5, 2012 Page 2

reallocated numbers in additional travel forecasts. While the iterative process proposed has a certain intellectual attractiveness — especially in helping understand the land use impacts of transportation investments — we are unconvinced that the resulting forecasts, of either jobs and households or travel, are reliable. The region has decades of experience with travel demand forecasting and, while that forecasting is not perfect, it does provide reasonable estimates of future conditions. The region, on the other hand, has little or no experience in linking land use and travel forecasting. While such linked forecasts may become more reliable in the future, it remains to be seen whether they are currently reliable enough to be used in such an important analysis.

The EIR analysis should rely on results of the MTC's travel forecasting model, using the fixed land use and demographic assumptions that apply in each alternative. If MTC choses to augment these results using the UrbanSIM model, especially in a "back-and-forth" with the travel forecasts, changes to the travel forecasting model results included in the EIR should be documented in a manner that describes the processes and assumptions that led to the changes and is thoroughly transparent and open to the scrutiny of its CMA and agency partners.

3. Alternative 4 is infeasible and should thus not be analyzed

Alternative 4, Eliminate Inter-Regional Commuting, assumes that "all Bay Area jobs will be filled by Bay Area workers (thereby eliminating incommuting from neighboring regions)." While building affordable homes in the Bay Region to house workers who live in the central valley is desirable, the plausibility of this occurring at the scale necessary to eliminate the in-commute is too low to justify for inclusion in the DEIR.

In addition, the Bay Area is not now, and has not been for decades, an island unto itself. People have lived outside but worked inside the Bay Area for a long time and their commute trips may or may not have a greater impact on the transportation system and environment than trips made by people who live *and* work in the Bay Area. Would, for example, a trip to work from Vacaville to Berkeley have a greater impact than a work trip from Vacaville to Davis or Sacramento, whether using a private vehicle or the Capitol Corridor?

Ashley Nguyen July 5, 2012 Page 3

4. All alternatives should assume a common set of land use control totals

Besides being infeasible, Alternative 4 would assume a significantly greater rate of growth than the other alternatives to "eliminate interregional commuting." While such an analysis may be interesting, its assumptions (as noted above) are unrealistic, making the alternative, infeasible, and would not serve to achieve one of MTC's key requirements, namely to reduce per capita greenhouse gas emissions. As was shown in the Initial Vision Scenario, assuming that a significantly larger number of households would locate in the Bay Area had a negative effect on the region's ability to achieve its State-mandated objective of greenhouse gas reduction. For that reason alone, Alternative 4 should be rejected.

5. The EIR should include an alternative that reflects more closely local plans and regional growth trends.

A "local plans" alternative would, among other things, direct jobs where housing already exists and would better assess what would happen if MTC's preferred scenario is not adopted. That is, it would provide a better "No Project" alternative than the No Project alternative. This alternative would be more feasible than the Alternative 4, the Eliminate Inter-Regional Commuting or Workforce Housing Opportunities alternative, and would provide a more realistic background for the financially constrained investment strategy.

We again thank you for the opportunity to comment on the NOP for the Draft Environmental Impact Report for Plan Bay Area.

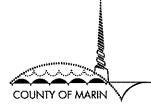
Sincerely,

Dan Ictu

Don Tatzin Chair

cc: Steve Heminger, MTC Executive Director Amy Worth, MTC Commissioner Federal Glover, MTC Commissioner CMA Directors

File: 20.21.06



# COMMUNITY DEVELOPMENT AGENCY

July 11, 2012

Metropolitan Transportation Commission & Association of Bay Area Governments Attn: Ms. Ashley Nguyen, EIR Project Manager Joseph P. Bort MetroCenter 101 Eighth Street Oakland, CA 94607-4700

Subject: Notice of Preparation of an Environmental Impact Report for Plan Bay Area (SCS)

Dear Ms. Nguyen:

Thank you for the opportunity to comment on the Notice of Preparation (NOP) for the Draft Environmental Impact Report on the Plan Bay Area project. Being familiar with the challenges of the environmental review process and the California Environmental Quality Act (CEQA), we appreciate the task at hand of preparing an EIR for a project of this scope and magnitude.

The following are staff's comments on the NOP.

<u>Opportunities for Tiering</u>. Given the breadth and programmatic nature of the Plan Bay Area project, the forthcoming EIR presents what appears to be an excellent opportunity to take advantage of the efficiencies allowed by tiering. The ability to prepare second tier or later tier CEQA documents for projects within Priority Development Areas (PDAs) will be especially helpful in facilitating and encouraging projects that implement the goals of Senate Bill 375 and the infill development strategy recommended by the Marin Countywide Plan. While we acknowledge this first tier EIR will address broad environmental issues, such as regional impacts, cumulative impacts and growth inducement, we nonetheless recommend the potential tiering capacity of the EIR be optimized to the extent feasible to create efficiencies in the environmental review process for later more specific projects.

<u>New Information</u>. In light of the fact that the Plan Bay Area process has been under way since 2010, the EIR consultant should identify new or updated information of importance that may have a bearing on the degree of impact(s) identified in the EIR. By way of example, population or job growth projection data that have been updated since the Preferred Scenario and Alternative Scenarios were developed should be taken into consideration. This will, of course, ensure the project description and environmental analysis are contemporary and avoids issues later on in the CEQA process regarding recirculation of the EIR.

Potential conflicts with other regional plans. One the more important issues Marin County has raised in connection with the scenarios developed to date is the potential for conflicts between the objectives of the Sustainable Communities Strategy and other regional plans, namely the Bay Conservation and Development Commission's Bay Plan Amendments and the Bay Area Air Quality Management District's 2010 Clean Air Plan standards and thresholds (the latter appears to be included in the NOP under the key impact category for Air Quality – "Potential conflict with applicable air quality plan or violation of applicable air quality standard or substantial contribution to an existing or potential air quality violation.") Potential conflicts between regional policy objectives related to environmental goals and policies should be carefully addressed in the EIR. With

PG. 2 OF 3

respect to the Bay Plan Amendments, the EIR should address potential impacts from directing future growth to PDAs and other locations that may be affected by sea level rise.

<u>Impact categories not specifically addressed</u>. The NOP notes several impact categories as being excluded from the scope of the EIR because no significant impacts of regional importance are expected to occur. It's not clear from the NOP if these conclusions were based on an initial study or other similar preliminary scoping analysis; however, it would be helpful if the EIR elaborates on the rationale for not addressing these particular impact categories. We also recommend the area of Public Services be reexamined before a final decision is made about the scope of the EIR.

<u>Key impact categories identified for analysis</u>. We are pleased to see the category of potential conflicts with locally adopted general plans and zoning regulations has been included in the impact analysis. It may be helpful to provide for local agency consultation regarding the findings and conclusions in this particular section of the EIR to take advantage of the knowledge and expertise local officials are able to contribute to the local policy analysis. This type of consultation could occur prior to or at the administrative draft EIR stage of the process to ensure an adequate analysis in the draft EIR and to avoid the potential for additional work on the EIR consultant's part in responding to comments on the draft EIR.

The availability of water to accommodate future growth is also an important issue in Marin in light of the fact that the urbanized area of the county relies on a combination of local reservoirs and imported water from Sonoma County, both of which have limited capacity to serve additional development. The EIR analysis of 'potential adverse effects on water supply' would benefit from review of local water management plans.

\* \* \* \* \* \* \* \*

We appreciate the chance to comment on this NOP and look forward to further opportunities to provide input on the EIR for the Plan Bay Area project.

Sincerely, Draw Brian C. Crawford

Director

cc: Marin County Board of Supervisors

From:	eircomments		
To:	Dawn Cameron		
CC:	Ananth Prasad;	Dan Collen;	Masoud Akbarzadeh
Date:	7/11/2012 5:32 PM		
Subject:	Re: Plan Bay Area	a EIR NOP Co	mments

Thank you for your comments; they will be considered carefully during the preparation of the Plan Bay Area Environmental Impact Report (EIR). To stay updated on Plan Bay Area and the environmental process, please visit <u>www.onebayarea.org</u>.

Ashley Nguyen, EIR Project Manager Metropolitan Transportation Commission 101 8th Street Oakland, CA 94607 (510) 817-5809

>>> "Dawn Cameron" <<u>Dawn.Cameron@rda.sccgov.org</u>> 7/11/2012 4:51 PM >>> Hi Ashley,

Attached are comments from Santa Clara County on the EIR NOP regarding the definition of the alternatives to be studied.

Dawn Cameron

**County Transportation Planner** 

County of Santa Clara Roads & Airports Department

101 Skyport Drive, San Jose, CA 95110

dawn.cameron@rda.sccgov.org <mailto:dawn.cameron@rda.sccgov.org>

P: 408-573-2465 F: 408-441-0276

#### NOTICE:

This email message and/or its attachments may contain information that is confidential or restricted. It is intended only for the individuals named as recipients in the message. If you are NOT an authorized recipient, you are prohibited from using, delivering, distributing, printing, copying, or disclosing the message or content to others and must delete the message from your computer. If you have received this message in error, please notify the sender by return email.

### **County of Santa Clara**

**Roads and Airports Department** 

101 Skyport Drive San Jose, California 95110-1302 (408) 573-2400

July 11, 2012

Ashley Nguyen Plan Bay Area EIR Project Manager Metropolitan Transportation Commission 101 Eighth Street Oakland, CA 94607

Subject: Notice of Preparation for the Plan Bay Area EIR - Arterial Signal Operations in Proposed Alternatives

Dear Ms. Ashley,

The County of Santa Clara Roads & Airports Department has reviewed the Notice of Preparation for the Plan Bay Area Environmental Impact Report (EIR) and the definitions for the five proposed EIR alternatives. We understand the need to study a variety of alternatives in the EIR document to properly inform decision makers and the public about the potential impacts of the project and alternatives. We are, however, concerned that in scoping the alternatives, the important role of arterial signal operations in the functioning of the existing transportation system is not fully recognized.

Arterial signal operations allow our existing road infrastructure to operate efficiency and to its fullest capacity, reducing stop-and-go driving which contributes to greenhouse gas emissions. Arterial signals are also vital for efficient operations of transit service on our roads and for bicyclists and pedestrians who travel along and cross the roads. In Santa Clara County, we have implemented cutting edge bicycle and pedestrian adaptive signal timing projects and plan to continue to use our signal technology to benefit all users of the roadway system.

The benefits of Alternative 3 "Transit Priority Focus" and Alternative 5 "Environment, Equity, and Jobs" cannot be fully realized without effective arterial signal operations. Removing funding for arterial signal timing and improvement projects in these alternatives will negatively affect the very transit operations these alternatives seek to enhance. It will also affect transit patrons who need to access transit by walking or bicycling on the road system.

We strongly suggest that MTC reconsider cutting arterial operations funding as part of Alternatives 3 and 5. If arterial signal timing projects continue to be excluded in these alternatives, then the EIR needs to fully analyze and proposed mitigations for the impacts on traffic flow and air quality due to inefficient signal operations on the region's arterial streets.

Sincerely,

Dawn S. Cameron County Transportation Planner

c: DEC, MA, AP



From:	Ashley Nguyen	
To:	Brenda Dix; Stefanie Hom	
Date:	7/11/2012 2:11 PM	
Subject:	Fwd: Plan Bay Area EIR	
Attachments:	2012_Plan-Bay-Area-EIR-NOP-DPC-Comments.pdf	

Collect, compile, etc.

Ashley Nguyen Senior Transportation Planner/Analyst Metropolitan Transportation Commission 101 Eighth Street | Oakland, CA 94607 Tel. 510.817.5809 | Fax 510.817.5848

>>> "Westhoff, Alex@DPC" <Alex.Westhoff@DELTA.ca.gov> 7/11/2012 12:12 PM >>>

Attached is a comment letter from the Delta Protection Commission for the Notice of Preparation of a Draft Environmental Impact Report for Plan Bay Area (SCH# 2012062029). A hard copy is being sent in the mail as well. Thank you.

Alex Westhoff Environmental Planner Delta Protection Commission 2101 Stone Blvd, Suite 210 West Sacramento, CA 95691 Office: (916) 375-4237 Fax: (916) 376-3962 2101 Stone Blvd., Suite 210 West Sacramento, CA 95691 Phone (916) 375-4800 / FAX (916) 376-3962 Home Page: <u>www.delta.ca.gov</u> EDMUND G. BROWN, JR., Governor



Contra Costa County Board of Supervisors

Sacramento County Board of

San Joaquin County Board of

Supervisors

Supervisors

Supervisors

July 11, 2012

Ashley Nguyen Metropolitan Transportation Commission 101 Eighth Street Oakland, CA 94601

Subject: Notice of Preparation of a Draft Environmental Impact Report for Plan Bay Area (SCH# 2012062029)

Dear Ashley Nguyen:

Staff of the Delta Protection Commission (Commission) have reviewed the *Notice of Preparation of a Draft Environmental Impact Report for Plan Bay Area* and are providing these comments to be considered for inclusion in the EIR.

The Commission's Land Use and Resource Management Plan (LURMP) for the Primary Zone of the Delta includes policies aimed to ensure orderly, balanced conservation and development of Delta land resources including agriculture, wildlife habitat and recreational facilities. Several of the Plan Bay Area's Priority Development Areas (PDAs) in Contra Costa County fall within the Delta's Secondary Zone and therefore have the capabilities to impact the resources of the Primary Zone. These advisory comments support the efficient land use pattern around transit, as discussed in the NOP, thus reducing the potential of future development in the Secondary Zone Communities to negatively impact land use resources of the Delta's Primary Zone.

Additionally, Senate Bill 1556 (Torlakson) directed the Commission to develop and adopt a plan and implementation program for a continuous regional recreational corridor, called the Great California Delta Trail, that will extend throughout the five Delta Counties, including Contra Costa and Solano, and link to the San Francisco Bay Trail system. The plan must also include links to existing and proposed public transportation and transit. Bicycle trails could be used for commuting in addition to recreation, thus assisting with developing a more efficient land use pattern around development. The completion of this regional trail system could help meet some of the goals of Plan Bay Area including climate protection, open space preservation, economic vitality, and transportation system effectiveness. Through Delta Trail planning, the Commission will serve as the facilitator

Solano County Board of

Yolo County Board of Supervisors

Cities of San Joaquin County

Cities of Contra Costa and Solano Counties

Cities of Sacramento and Yolo Counties

Central Delta Reclamation Districts

North Delta Reclamation Districts

South Delta Reclamation Districts

Business, Transportation and Housing

Department of Food and Agriculture

Natural Resources Agency

State Lands Commission

Ashley Nguyen July 11, 2012 Page Two

> organization, working with local entities on trail planning so that individual Delta Trail segments can eventually be incorporated into a regional master plan which crosses jurisdictional boundaries. If the Plan Bay Area incorporates the inclusion of bicycle lanes into the general use designation, it would be useful for CEQA streamlining for lead agencies and local jurisdictions which are developing Delta Trail segments

Thank you for the opportunity to provide input. Please contact the Commission office at (916) 375-4800, if you have any questions about the comments provided herein.

Sincerely,

Michael Machado Executive Director

cc: State Clearinghouse in the Office of Planning and Research

From:	eircomments
To:	Amanda Sanders
CC:	Larry Tong
Date:	7/11/2012 5:24 PM
Subject:	Re: EBRPD Comment Letter on Plan Bay Area DEIR

Thank you for your comments; they will be considered carefully during the preparation of the Plan Bay Area Environmental Impact Report (EIR). To stay updated on Plan Bay Area and the environmental process, please visit <u>www.onebayarea.org</u>.

Ashley Nguyen, EIR Project Manager Metropolitan Transportation Commission 101 8th Street Oakland, CA 94607 (510) 817-5809

>>> Amanda Sanders <<u>asanders@ebparks.org</u>> 7/11/2012 2:13 PM >>> Good Afternoon,

Please find East Bay Regional Park District's comment letter with enclosure attached to this email. A hardcopy of these documents will follow by US Mail.

Please forward any responses to the letter to Larry Tong at <u>ltong@ebparks.org</u><<u>mailto:ltong@ebparks.org</u>> or (510) 544-2621. If you have any difficulties opening the electronic documents please let me know.

Thank you, Amanda Sanders [Description: P:\Symprex\ebrpd\_green\_leaf.jpg]

Amanda Sanders

Office Assistant | Land Division

East Bay Regional Park District

2950 Peralta Oaks Court, Oakland, CA 94605

Tel: 510-544-2650 | 510-569-1417

asanders@ebparks.org<mailto:asanders@ebparks.org> | www.ebparks.org<http://www.ebparks.org>

STATEMENT OF CONFIDENTIALITY | This electronic message and any files or attachments transmitted with it may be confidential, privileged, or proprietary information of the East Bay Regional Park District. The information is solely for the use of the individual or entity to which it was intended to be addressed. If the reader of this message is not the

intended recipient, you are hereby notified that use, distribution, or copying of this e-mail is strictly prohibited. If you received this e-mail in error, please notify the sender immediately, destroy any copies, and delete it from your system.

P Please consider the environment before you print



2950 PERALTA OAKS COURT P.O. BOX 5381 OAKLAND CALIFORNIA 94605-0381 T. I 888 EBPARKS F. 510 569 4319 TDD. 510 633 0460 WWW.EBPARKS.ORG

July 11, 2012

### SENT VIA EMAIL AND HARDCOPY

Ashley Nguyen, EIR Project Manager Metropolitan Transportation Commission 101 Eighth Street Oakland, CA 94607

#### RE: SCOPING FOR PLAN BAY AREA DRAFT ENVIRONMENTAL IMPACT REPORT (EIR)

Dear Ms. Nguyen:

The East Bay Regional Park District (EBRPD) thanks the Metropolitan Transportation Commission (MTC) and the Association of Bay Area Governments (ABAG) for taking the lead under SB 375 in creating Plan Bay Area, a plan for a thriving and sustainable Bay Area.

All great regions have great parks and open spaces. In Plan Bay Area, MTC and ABAG are making substantial progress in focusing new housing and jobs around transit to house an additional 2 million residents in 660,000 additional housing units and to facilitate 1 million additional jobs, over the next 27 years, with an investment of \$277 billion into our regional economy. To have a truly sustainable plan, it is critical that Plan Bay Area fully address the protection and enhancement of vital natural resources in the region.

The Draft EIR for Plan Bay Area transportation and land use developments need to fully mitigate for significant adverse impacts on Parks, Recreation, Open Space and Greenfields.

Meaningful financial incentives for protecting vital natural resource areas that are required by SB 375 need to be included as mitigation measures.

Mitigation measures need to address any significant impacts and conflicts with adopted City, County and Regional Open Space Plans and Elements.

**Board of Directors** 



Ted Radke

Ward 7

Carol Severin President Ward 3 John Sutter Vice-President Ward 2

Ayn Wieskamp Treasurer Ward 5 Whitney Dotson Secretary Ward I Doug Siden Ward 4 Beverly Lane Ward 6 Robert E. Doyle General Manager A. Nguyen July 11, 2012 Page 2

Mitigation measures need to acknowledge and include the role that natural resource areas and open space conservation play in mitigating adverse impacts from transportation and land use developments, including, but not limited to, the following:

- Carbon sequestration, especially of tidal marsh and coniferous forest and properly managed grasslands;
- Greenhouse gas reduction through trip reduction;
- Health benefits of getting people out of their cars;
- Protection of wildlife habitat, migration corridors and linkages;
- Preservation of endangered species habitats;
- Restoration of habitats to mitigate for development;
- Attenuation of noise and light through open space buffers;
- Preservation of scenic open space enhancing property values;
- Protecting and enhancing water quality;
- Recreational opportunities;
- Creation of jobs in conservation;
- Keeping agriculture viable;
- Preventing development of seismically unstable areas

We previously submitted in February 2012 the attached Natural Resources Set Aside Letter that outlines a potential mitigation measure for protecting and enhancing vital natural resource areas in the region.

The EBRPD looks forward to working with MTC, ABAG and our sister open space agencies to ensure that Plan Bay Area reflects the fundamental mandates of SB 375 to protect and enhance our vital resource areas. Please contact me if there are any questions about this matter.

Regards,

Larry Tong Interagency Planning Manager 510/544-2621 Itong@ebparks.org

Attachment:

I. Natural Resource Set Aside Letter, Feb. 17, 2012

 From:
 eircomments

 To:
 MCL

 Date:
 7/11/2012 5:26 PM

 Subject:
 Re: Plan Bay Area EIR

Thank you for your comments; they will be considered carefully during the preparation of the Plan Bay Area Environmental Impact Report (EIR). To stay updated on Plan Bay Area and the environmental process, please visit <u>www.onebayarea.org</u>.

Ashley Nguyen, EIR Project Manager Metropolitan Transportation Commission 101 8th Street Oakland, CA 94607 (510) 817-5809

>>> "MCL" <mcl@marinconservationleague.org > 7/11/2012 2:41 PM >>>

Ashley Nguyen, EIR Project Manager

Metropolitan Transportation Commission

Joseph P. Bort MetroCenter

101 8th Street

Oakland, CA 94607

July 11, 2012

Re: Plan Bay Area EIR

Dear Ms. Nguyen:

The Marin Conservation League has actively monitored significant environmental issues in Marin for some 78 years, and been following the efforts of ABAG and MTC under SB 375 since the outset of their efforts. Recently this effort has been referred to as "Plan Bay Area." In a letter dated April 24, 2012, MCL submitted comments on the "Jobs-Housing Connection Scenario," which is also called the "preferred scenario." In addition, we have reviewed the "Preferred Transportation Investment Strategy," and attended the "Plan Bay Area Environmental Impact Report Scoping Meeting," held in Marin last month. There remains considerable uncertainty about what these plans entail, and so we were quite disappointed that there was no opportunity to ask questions at the scoping meeting.

Per your invitation, we submit these comments in connection with the preparation of a draft programmatic Environmental Impact Report for Plan Bay Area. These comments address two aspects of the draft EIR: 1) what effects should be analyzed (i.e., scoping comments), and 2) what alternatives to the "preferred scenario" should be considered. We will address these separately after providing some preliminary comments.

**Preliminary Comments** 

CEQA Streamlining - CEQA has proven to be a useful and effective tool in enhancing government decisions that impact the environment. In particular, CEQA has become an important part of land use decision-making. Accordingly, MCL is quite concerned about efforts to exempt projects from CEQA or which "streamline" the CEQA process could lead to faulty decision making. We understand that SB 375 itself provides the statutory framework for CEQA streamlining, and that the regional Metropolitan Planning Organization (i.e., ABAG and MTC) lacks authority to change SB 375 (see comment on legal authority). Nonetheless, the Plan Bay Area process inherently determines, in large part, which projects are subject to CEQA exemptions/streamlining. To the extent possible, Plan Bay Area's actions should minimize the number of projects that are not subject to the normal CEQA process, and should provide better guidance of how streamlining will work. In our comments on the preferred scenario we raised our concern that this document substantially overstates population growth over the upcoming decades and designates more PDAs than are needed to accommodate likely growth. The effect of this appears to be that more areas will be subject to CEQA streamlining than is justified.

Under SB375 CEQA streamlining may be tied to the existence of a "Sustainable Communities Environmental Assessment," but it is not clear what topics would be included in an SCEA, what alternatives would be analyzed (such as greater or lesser densities or alternative mixes of housing and jobs or other uses), whether the SCEA needs to address cumulative impacts or what types of public participation would be involved, (i.e., what notice and length of review times would be afforded). Moreover it is unclear whether the SCEA would be made available to the public in draft and final form, or whether it would be immune from judicial review. It is also unclear how the SCEA process will relate to the SB 226 environmental review process for infill projects, currently in final stages of rule-making. SB 226 amendments to the CEQA Guidelines will establish a parallel CEQA process, guided by a modified checklist and criteria for qualifying projects. This appears to overlap considerably with the SCEA and should be clarified.

Poor Coordination Between Preferred Scenario and Transportation Plan -We believe that an important objective of SB 375 was to require close coordination between land use and transportation planning. Unfortunately, our assessment is that the Preferred Scenario and the Preferred Transportation Investment Strategy ("TIS") are poorly coordinated. Specifically, it appears to us that the TIS was developed in a vacuum without much regard to the Preferred Scenario.

Function of the Programmatic EIR - It is not clear how the draft program EIR will be used as a first tier document given the regional level of analysis. Unlike typical program EIRs, which may be based on local general plans or on comparable projects within a region, this one will lack the many elements that would enable a local jurisdiction to prepare second tier analyses for development in or out of a PDA. We believe that the temptation to prepare second tier documents based on this EIR will lead to a serious failure to address important CEQA questions.

Legal Authority - We recognize that MTC and ABAG are constrained by SB 375 and other laws which constrain what they do and propose. Some of the alternatives being considered for the draft EIR appear to be beyond their legal authority. For example, one alternative is to "Eliminate Inter-Regional Commute." It is not entirely clear how this would be accomplished (beyond providing "major" housing subsidies), nor is it clear whether legal authority for this alternative exists, e.g., whether authority exists to provide major housing subsidies. MTC and ABAG need to take a consistent approach regarding legal authority for the alternatives they consider. Specifically, they should not reject alternatives proposed by MCL and other commentators as being beyond their legal authority, while they propose alternatives themselves that lack express legal authority. Moreover, if MTC and ABAG proceed on the basis that one outcome of this process is to seek additional legal authority that does not presently exist, they should likewise consider the possibility of legal changes suggested by commentators, for example, that legal provisions regarding CEQA streamlining should be simplified and made more restrictive.

Employment/Housing Assumptions - While superficially it makes sense that housing and jobs should be close, the reality is not that simple for a number of reasons. Many, if not most, households have more than one working adult, and they often work in different locations. Does the modeling account for this? If one household member is an accountant working in the SF financial district and another is a retail clerk working in Marin, where is the best location for them? Moreover, many types of jobs have high turnover. For example, the retail, restaurant, and construction industries are dominated by short-term jobs. Does the modeling recognize that the people who work in these industries may not move as often as they change jobs? Is it realistic to think there can be a strong link between these types of jobs and housing? Restaurant workers often cannot use public transit because of late hours. Likewise construction workers continually have to go to different sites. How does Plan Bay Area address these worker patterns? Overall, people change jobs more frequently than they move.

Transit Funding - The strategy of rewarding communities for making PDA designations with transit funding could have the perverse effect of promoting unwarranted growth. Simply put, it appears that a disproportionate amount of funding will be directed to growing communities, while mature communities, such as Marin, will be deprived of their fair share of transit funds. This is especially unfair in view of Plan Bay Area's recognition that growth should be channeled into other areas. Funding for Marin's transit systems should not be diminished simply because Marin is not a growth area.

The "No Action" Alternative - Further explanation of the "no action" alternative would be helpful. The PDAs have already been established by local jurisdictions - indeed, ABAG emphasizes this fact as proof that it is not interfering with local control. If "No Action" is no different than what is already embedded in existing general plans and zoning, how does this alternative differ from the preferred scenario? Plan Bay Area says that the "No Action" alternative means "no PDAs." Does this mean that communities which have already made PDA designations would be required to reverse those designations?

PDAs vs. TPPs - The preferred scenario refers extensively to PDAs and makes little mention of TPPs. Other documents prepared by Plan Bay Area seem to emphasize TPPs. In this letter, following the usage of the preferred scenario, MCL has focused on PDAs. Nonetheless, many of our comments (for example, those related to CEQA "streamlining" and PDA variability) apply with equal force to TPPs.

**Scoping Comments** 

Population Projections - In prior comments, MCL pointed out the likelihood that the population and job growth projections used in the preferred scenario are excessive. In summary, the projected numbers do not square with historic trends and assume that there will be no

economic recessions for thirty years. We believe it is obvious that the assessment of environmental impact will differ if different population/job growth numbers are used. Specifically, there are potential adverse effects if plans are made to accommodate growth that never occurs, and these adverse effects could vary among the alternatives. Forcing communities to alter their general plans and to rezone land to accommodate excess growth could give developers the upper hand in choosing where and when to build projects. This could encourage sprawl, especially given the prospect that these projects will be fully or partially exempt from CEQA. We urge that the draft EIR assess impacts of all alternatives under a variety of population growth scenarios.

PDA Variability - Plan Bay Area has made a point of noting that there is quite a bit of variability among the PDAs. For example, a PDA in an urban core served by extensive existing transit, such as downtown Oakland, is substantially different than a PDA in a remote area such as Cloverdale, which may, sometime in the future, be served by public transit. Likewise, a PDA designation may be based on the belief that the area will be served by transit sometime in the future. For example, we understand that the Cloverdale PDA is based on the assumption that SMART may, at some future date, be extended there. This assumption is questionable. The differences in PDAs need to be taken into account, and the draft EIR should not treat all development in all PDAs as being the same.

Sea Level Rise - There is a very strong scientific consensus that the sea level will continue to rise as a result of global warming. Plan Bay Area will not stop that from happening. The draft EIR should account for the likelihood of sea level rise. The analysis should include the indirect impacts of methods now being studied to protect (adapt) those large urban areas, some of them within PDAs, that are in low-lying areas at the margin of the Bay and are vulnerable to sea level rise. These may include restrictive development policies such as avoidance of future investment in such areas, more stringent approaches, such as structural barriers, or "soft" methods, such as expansion of vegetated marsh to buffer future storm surges.

Public Funding - The preferred alternatives for housing, jobs and transportation require large inputs of direct (e.g., subsidies, grants, etc.) and indirect (e.g., tax breaks, etc.) public funding. Yet both direct and indirect sources of public funding are under extreme pressure, and their continued availability is at risk. What impacts are associated with the risk that funding sources will dry up? For example, does it make sense to maintain a Cloverdale PDA if no money is available to extend SMART there?

The "Paradox of Densification" - As to each of the alternatives, the EIR needs to characterize the effects of compact infill development projects that, while designed to encourage reduced commutes, could also result in diminished level of service and pose an array of problems due to increased local traffic congestion and pollution.

Air Quality - As to each of the alternatives, the EIR should address increased health risks within transit corridors due to concentrations of particulate matter and other air pollutants. Housing should be avoided in areas where these pollutants are concentrated. The EIR should assess health risks in relation to any residential projects, particularly affordable housing, that might be accommodated within PDAs that lie within that margin of exposure.

Impacts on Agricultural Lands, Open Space and Existing Uses - For each of the alternatives, the impacts on agricultural lands and open space converted to transportation and urban uses should be analyzed. In addition, impacts caused by land use disruption and displacement of population and housing, and the adverse consequences of displacing existing small businesses with new mixed-use, high density residential development should be discussed. Also, please include analysis of the relative benefits of reusing existing housing stock as one means of meeting affordable demand as an alternative to constructing new multifamily developments.

Energy - The discussion of energy consumption should include both renewable and non-renewable energy. Although the intent of Plan Bay Area is to decrease dependence on non-renewable energy (notably fossil fuels), no energy source is without impacts. Sources such as nuclear and hydroelectric facilities do not produce greenhouse gases, nor are they classified as renewable. Where do they fall in this analysis? Wind and solar sources are deemed desirable but also may result in local environmental impacts which should be described and evaluated. Efficiency and conservation do not appear in this analysis except with reference to consistency ("inconsistency") with energy conservation plans or policies. Again, the issues are worded in such a way as to predispose the "No Project" alternative as "bad" for the environment. (See the above preliminary comment on the "No Project" alternative.)

Noise - Noise analyses tend to focus on construction-related noise. Post-construction noise should be considered in the draft EIR, in that development patterns are intended to shift toward transit corridors and concentrated urban centers, both of which can be sources of noise. The standard should not be limited to indoor noise levels, which can often be mitigated. Outdoor levels cannot be similarly mitigated. Earthquakes - There are many instances of urban development placed on fill overlying seismically unstable fill and mud around San Francisco Bay. Engineering methods have improved over the decades, but the Loma Prieta earthquake reminded us of the vulnerability of existing development on such lands (San Francisco Marina) to seismic hazards. Where PDAs occur on filled lands, or where new development might occur outside PDAs but along transit corridors or community centers on such lands, the analysis should emphasize the need for appropriate engineering.

Biological Resources - While many direct impacts on biological resources appear to be covered in the list of issues to be evaluated, the indirect impacts associated with increases in population and spillover of human activities into open space and sensitive habitats are not mentioned. These impacts, and how they will be mitigated, should be considered in the EIR.

Surface Water Impacts - The EIR analysis should address the effects on water quality of surface waters due to runoff from the "hardscape" and intense uses of denser, compact urban development. It should also address the potential for further loss of above-ground creeks and other natural water features through urban core areas, which could otherwise serve as continuous habitat corridors.

Visual Resources and Cultural Resources - The EIR can have no more than a highly generic discussion of both visual and cultural resources in the Bay Area. We do not believe that this Program EIR will be useful as a first tier document for local developments with specific resources and policies.

Water Supply - Supplying water to the growing Bay Area population will have its own set of environmental impacts. While the Bay Area receives its water from a wide variety of sources, use of each of these sources has its own set of problems. For example, a great deal of water is taken from the Delta, which substantially impacts fish populations. Likewise, substantial population growth in Marin could require construction of an energy-intensive desalination plant. The draft EIR should analyze where the water to serve the increased population will come from and the environmental impacts of increasing water supplies. The analysis should assume increased rainfall variability and its impacts on water supply. Alternatives For Evaluation During the EIR Process - MCL believes that the EIR alternatives identified by ABAG and MTC are neither realistic nor helpful in understanding how best to deal with growth in the Bay Area. Accordingly, we suggest that the following alternatives be considered. Each of the following alternatives is intended to promote more rational land use planning, while maintaining local land use control. By suggesting these alternatives MCL does not mean to imply that it endorses any of them; simply that they appear to be sufficiently credible alternative approaches that warrant study and comparison.

Promoting Growth Based on PDA Ranking - As Plan Bay Area has repeatedly pointed out, not all PDAs are created equal. Given the vast differences in the PDAs, we suggest that a ranking system be employed (much as transit projects are ranked), and that growth (and funding) be channeled, where possible, to the highest ranked PDAs. For example, growth in PDAs in urban cores, such as San Francisco and Oakland, which are currently served by extensive public transit, is preferable to growth in outlying PDAs, such as those in Sebastopol, Sonoma or Cloverdale.

Focus Development Around BART - BART serves a major portion of the Bay Area and efforts to expand service to San Jose/Silicon Valley are underway. BART is, by far, the most effective regional transit system in getting people out of their cars. In addition to serving almost all major Bay Area employment centers, it also provides access to civic centers, ball parks, shopping, cultural centers (such as museums, opera, ballet or symphony), universities, etc. Focusing development around BART could be a far more effective approach in reducing VMT.

Exempt the North Bay from the Plan - The Preferred Scenario presumes that most growth in Bay Area jobs and housing will occur in San Jose, Silicon Valley, San Francisco and the East Bay. The North Bay, i.e., Marin, Sonoma, Solano, and Napa, collectively have a relatively small population and a relatively small base of jobs. The North Bay has unique patterns of development, unique transit systems and unique economies. Rather than lumping the North Bay together with the rest of the Bay Area, it should be treated separately.

Dramatically Increase Gas Prices - Market forces can be extremely efficient in allocating resources. A dramatic increase in the gas tax would do more to reduce VMT than any planning effort.

Thank you for your consideration of our comments.

Susan Stompe

President

Marin Conservation League

1623-A Fifth Ave.

San Rafael, CA 94901

415-485-6257

Ashley Nguyen, EIR Project Manager Metropolitan Transportation Commission Joseph P. Bort MetroCenter 101 8<sup>th</sup> Street Oakland, CA 94607



Protecting Marin Since 1934

VIA E-Mail (eircomments@mtc.ca.gov)

July 11, 2012

Re: Plan Bay Area EIR

Dear Ms. Nguyen:

The Marin Conservation League has actively monitored significant environmental issues in Marin for some 78 years, and been following the efforts of ABAG and MTC under SB 375 since the outset of their efforts. Recently this effort has been referred to as "Plan Bay Area." In a letter dated April 24, 2012, MCL submitted comments on the "Jobs-Housing Connection Scenario," which is also called the "preferred scenario." In addition, we have reviewed the "Preferred Transportation Investment Strategy," and attended the "Plan Bay Area Environmental Impact Report Scoping Meeting," held in Marin last month. There remains considerable uncertainty about what these plans entail, and so we were quite disappointed that there was no opportunity to ask questions at the scoping meeting.

Per your invitation, we submit these comments in connection with the preparation of a draft programmatic Environmental Impact Report for Plan Bay Area. These comments address two aspects of the draft EIR: 1) what effects should be analyzed (*i.e.*, scoping comments), and 2) what alternatives to the "preferred scenario" should be considered. We will address these separately after providing some preliminary comments.

#### **Preliminary Comments**

*CEQA Streamlining* – CEQA has proven to be a useful and effective tool in enhancing government decisions that impact the environment. In particular, CEQA has become an important part of land use decision-making. Accordingly, MCL is quite concerned about efforts to exempt projects from CEQA or which "streamline" the CEQA process could lead to faulty decision making. We understand that SB 375 itself provides the statutory framework for CEQA streamlining, and that the regional Metropolitan Planning Organization (*i.e.*, ABAG and MTC) lacks authority to change SB 375 (*see* comment on legal authority). Nonetheless, the Plan Bay Area process inherently determines, in large part, which projects are subject to CEQA exemptions/streamlining. To the extent possible, Plan Bay Area's actions should minimize the number of projects that are not subject to the normal CEQA process, and should provide better guidance of how streamlining will work. In our comments on the preferred scenario we raised our concern that this document substantially overstates

PHONE: 415.485.6257 FAX: 415.485.6259 EMAIL: mcl@marinconservationleague.org URL: www.marinconservationleague.org ADDRESS: 1623–A Fifth Avenue San Rafael, CA 94901 population growth over the upcoming decades and designates more PDAs than are needed to accommodate likely growth. The effect of this appears to be that more areas will be subject to CEQA streamlining than is justified.

Under SB375 CEQA streamlining may be tied to the existence of a "Sustainable Communities Environmental Assessment," but it is not clear what topics would be included in an SCEA, what alternatives would be analyzed (such as greater or lesser densities or alternative mixes of housing and jobs or other uses), whether the SCEA needs to address cumulative impacts or what types of public participation would be involved, (*i.e.*, what notice and length of review times would be afforded). Moreover it is unclear whether the SCEA would be made available to the public in draft and final form, or whether it would be immune from judicial review. It is also unclear how the SCEA process will relate to the SB 226 environmental review process for infill projects, currently in final stages of rule-making. SB 226 amendments to the CEQA Guidelines will establish a parallel CEQA process, guided by a modified checklist and criteria for qualifying projects. This appears to overlap considerably with the SCEA and should be clarified.

*Poor Coordination Between Preferred Scenario and Transportation Plan* – We believe that an important objective of SB 375 was to require close coordination between land use and transportation planning. Unfortunately, our assessment is that the Preferred Scenario and the Preferred Transportation Investment Strategy ("TIS") are poorly coordinated. Specifically, it appears to us that the TIS was developed in a vacuum without much regard to the Preferred Scenario.

*Function of the Programmatic EIR* – It is not clear how the draft program EIR will be used as a first tier document given the regional level of analysis. Unlike typical program EIRs, which may be based on local general plans or on comparable projects within a region, this one will lack the many elements that would enable a local jurisdiction to prepare second tier analyses for development in or out of a PDA. We believe that the temptation to prepare second tier documents based on this EIR will lead to a serious failure to address important CEQA questions.

*Legal Authority* – We recognize that MTC and ABAG are constrained by SB 375 and other laws which constrain what they do and propose. Some of the alternatives being considered for the draft EIR appear to be beyond their legal authority. For example, one alternative is to "Eliminate Inter-Regional Commute." It is not entirely clear how this would be accomplished (beyond providing "major" housing subsidies), nor is it clear whether legal authority for this alternative exists, *e.g.*, whether authority exists to provide major housing subsidies. MTC and ABAG need to take a consistent approach regarding legal authority for the alternatives they consider. Specifically, they should not reject alternatives proposed by MCL and other commentators as being beyond their legal authority, while they propose alternatives themselves that lack express legal authority. Moreover, if MTC and ABAG proceed on the basis that one outcome of this process is to seek additional legal authority that does not presently exist, they should likewise consider the possibility of legal changes suggested by commentators, for example, that legal provisions regarding CEQA streamlining should be simplified and made more restrictive.

*Employment/Housing Assumptions* – While superficially it makes sense that housing and jobs should be close, the reality is not that simple for a number of reasons. Many, if not most, households have more than one working adult, and they often work in different locations. Does the modeling account for this? If one household member is an accountant working in the SF financial district and another is a retail clerk working in Marin, where is the best location for them? Moreover, many types of jobs have high turnover. For example, the retail, restaurant, and construction industries are dominated by short-term jobs. Does the modeling recognize that the people who work in these industries may not move as often as they change jobs? Is it realistic to think there can be a strong link between these types of jobs and housing? Restaurant workers often cannot use public transit because of late hours. Likewise construction workers continually have to go to different sites. How does Plan Bay Area address these worker patterns? Overall, people change jobs more frequently than they move.

*Transit Funding* – The strategy of rewarding communities for making PDA designations with transit funding could have the perverse effect of promoting unwarranted growth. Simply put, it appears that a disproportionate amount of funding will be directed to growing communities, while mature communities, such as Marin, will be deprived of their fair share of transit funds. This is especially unfair in view of Plan Bay Area's recognition that growth should be channeled into other areas. Funding for Marin's transit systems should not be diminished simply because Marin is not a growth area.

*The "No Action" Alternative* – Further explanation of the "no action" alternative would be helpful. The PDAs have already been established by local jurisdictions – indeed, ABAG emphasizes this fact as proof that it is not interfering with local control. If "No Action" is no different than what is already embedded in existing general plans and zoning, how does this alternative differ from the preferred scenario? Plan Bay Area says that the "No Action" alternative means "no PDAs." Does this mean that communities which have already made PDA designations would be required to reverse those designations?

*PDAs vs. TPPs* – The preferred scenario refers extensively to PDAs and makes little mention of TPPs. Other documents prepared by Plan Bay Area seem to emphasize TPPs. In this letter, following the usage of the preferred scenario, MCL has focused on PDAs. Nonetheless, many of our comments (for example, those related to CEQA "streamlining" and PDA variability) apply with equal force to TPPs.

#### **Scoping Comments**

Population Projections - In prior comments, MCL pointed out the likelihood that

the population and job growth projections used in the preferred scenario are excessive. In summary, the projected numbers do not square with historic trends and assume that there will be no economic recessions for thirty years. We believe it is obvious that the assessment of environmental impact will differ if different population/job growth numbers are used. Specifically, there are potential adverse effects if plans are made to accommodate growth that never occurs, and these adverse effects could vary among the alternatives. Forcing communities to alter their general plans and to rezone land to accommodate excess growth could give developers the upper hand in choosing where and when to build projects. This could encourage sprawl, especially given the prospect that these projects will be fully or partially exempt from CEQA. We urge that the draft EIR assess impacts of all alternatives under a variety of population growth scenarios.

*PDA Variability* – Plan Bay Area has made a point of noting that there is quite a bit of variability among the PDAs. For example, a PDA in an urban core served by extensive existing transit, such as downtown Oakland, is substantially different than a PDA in a remote area such as Cloverdale, which may, sometime in the future, be served by public transit. Likewise, a PDA designation may be based on the belief that the area will be served by transit sometime in the future. For example, we understand that the Cloverdale PDA is based on the assumption that SMART may, at some future date, be extended there. This assumption is questionable. The differences in PDAs need to be taken into account, and the draft EIR should not treat all development in all PDAs as being the same.

Sea Level Rise – There is a very strong scientific consensus that the sea level will continue to rise as a result of global warming. Plan Bay Area will not stop that from happening. The draft EIR should account for the likelihood of sea level rise. The analysis should include the indirect impacts of methods now being studied to protect (adapt) those large urban areas, some of them within PDAs, that are in low-lying areas at the margin of the Bay and are vulnerable to sea level rise. These may include restrictive development policies such as avoidance of future investment in such areas, more stringent approaches, such as structural barriers, or "soft" methods, such as expansion of vegetated marsh to buffer future storm surges.

*Public Funding* – The preferred alternatives for housing, jobs and transportation require large inputs of direct (*e.g.*, subsidies, grants, etc.) and indirect (*e.g.*, tax breaks, etc.) public funding. Yet both direct and indirect sources of public funding are under extreme pressure, and their continued availability is at risk. What impacts are associated with the risk that funding sources will dry up? For example, does it make sense to maintain a Cloverdale PDA if no money is available to extend SMART there?

*The "Paradox of Densification"* – As to each of the alternatives, the EIR needs to characterize the effects of compact infill development projects that, while designed to encourage reduced commutes, could also result in diminished level of service and pose an array of problems due to increased local traffic congestion and pollution.

*Air Quality* – As to each of the alternatives, the EIR should address increased health risks within transit corridors due to concentrations of particulate matter and other air pollutants. Housing should be avoided in areas where these pollutants are concentrated. The EIR should assess health risks in relation to any residential projects, particularly affordable housing, that might be accommodated within PDAs that lie within that margin of exposure.

*Impacts on Agricultural Lands, Open Space and Existing Uses* – For each of the alternatives, the impacts on agricultural lands and open space converted to transportation and urban uses should be analyzed. In addition, impacts caused by land use disruption and displacement of population and housing, and the adverse consequences of displacing existing small businesses with new mixed-use, high density residential development should be discussed. Also, please include analysis of the relative benefits of reusing existing housing stock as one means of meeting affordable demand as an alternative to constructing new multifamily developments.

*Energy* – The discussion of energy consumption should include both renewable and non-renewable energy. Although the intent of Plan Bay Area is to decrease dependence on non-renewable energy (notably fossil fuels), no energy source is without impacts. Sources such as nuclear and hydroelectric facilities do not produce greenhouse gases, nor are they classified as renewable. Where do they fall in this analysis? Wind and solar sources are deemed desirable but also may result in local environmental impacts which should be described and evaluated. Efficiency and conservation do not appear in this analysis except with reference to consistency ("inconsistency") with energy conservation plans or policies. Again, the issues are worded in such a way as to predispose the "No Project" alternative as "bad" for the environment. (*See* the above preliminary comment on the "No Project" alternative.)

*Noise* – Noise analyses tend to focus on construction-related noise. Postconstruction noise should be considered in the draft EIR, in that development patterns are intended to shift toward transit corridors and concentrated urban centers, both of which can be sources of noise. The standard should not be limited to indoor noise levels, which can often be mitigated. Outdoor levels cannot be similarly mitigated.

*Earthquakes* – There are many instances of urban development placed on fill overlying seismically unstable fill and mud around San Francisco Bay. Engineering methods have improved over the decades, but the Loma Prieta earthquake reminded us of the vulnerability of existing development on such lands (San Francisco Marina) to seismic hazards. Where PDAs occur on filled lands, or where new development might occur outside PDAs but along transit corridors or community centers on such lands, the analysis should emphasize the need for appropriate engineering.

Biological Resources - While many direct impacts on biological resources appear

to be covered in the list of issues to be evaluated, the indirect impacts associated with increases in population and spillover of human activities into open space and sensitive habitats are not mentioned. These impacts, and how they will be mitigated, should be considered in the EIR.

*Surface Water Impacts* – The EIR analysis should address the effects on water quality of surface waters due to runoff from the "hardscape" and intense uses of denser, compact urban development. It should also address the potential for further loss of above-ground creeks and other natural water features through urban core areas, which could otherwise serve as continuous habitat corridors.

*Visual Resources and Cultural Resources* – The EIR can have no more than a highly generic discussion of both visual and cultural resources in the Bay Area. We do not believe that this Program EIR will be useful as a first tier document for local developments with specific resources and policies.

*Water Supply* – Supplying water to the growing Bay Area population will have its own set of environmental impacts. While the Bay Area receives its water from a wide variety of sources, use of each of these sources has its own set of problems. For example, a great deal of water is taken from the Delta, which substantially impacts fish populations. Likewise, substantial population growth in Marin could require construction of an energyintensive desalination plant. The draft EIR should analyze where the water to serve the increased population will come from and the environmental impacts of increasing water supplies. The analysis should assume increased rainfall variability and its impacts on water supply.

<u>Alternatives For Evaluation During the EIR Process</u> – MCL believes that the EIR alternatives identified by ABAG and MTC are neither realistic nor helpful in understanding how best to deal with growth in the Bay Area. Accordingly, we suggest that the following alternatives be considered. Each of the following alternatives is intended to promote more rational land use planning, while maintaining local land use control. By suggesting these alternatives MCL does not mean to imply that it endorses any of them; simply that they appear to be sufficiently credible alternative approaches that warrant study and comparison.

*Promoting Growth Based on PDA Ranking* – As Plan Bay Area has repeatedly pointed out, not all PDAs are created equal. Given the vast differences in the PDAs, we suggest that a ranking system be employed (much as transit projects are ranked), and that growth (and funding) be channeled, where possible, to the highest ranked PDAs. For example, growth in PDAs in urban cores, such as San Francisco and Oakland, which are currently served by extensive public transit, is preferable to growth in outlying PDAs, such as those in Sebastopol, Sonoma or Cloverdale.

*Focus Development Around BART* – BART serves a major portion of the Bay Area and efforts to expand service to San Jose/Silicon Valley are underway. BART is, by far, the most

effective regional transit system in getting people out of their cars. In addition to serving almost all major Bay Area employment centers, it also provides access to civic centers, ball parks, shopping, cultural centers (such as museums, opera, ballet or symphony), universities, etc. Focusing development around BART could be a far more effective approach in reducing VMT.

*Exempt the North Bay from the Plan* – The Preferred Scenario presumes that most growth in Bay Area jobs and housing will occur in San Jose, Silicon Valley, San Francisco and the East Bay. The North Bay, *i.e.*, Marin, Sonoma, Solano, and Napa, collectively have a relatively small population and a relatively small base of jobs. The North Bay has unique patterns of development, unique transit systems and unique economies. Rather than lumping the North Bay together with the rest of the Bay Area, it should be treated separately.

*Dramatically Increase Gas Prices* – Market forces can be extremely efficient in allocating resources. A dramatic increase in the gas tax would do more to reduce VMT than any planning effort.

Thank you for your consideration of our comments.

Susan Stompe

Susan Stompe, President

From:eircommentsTo:James RaivesCC:Elise Holland; Linda Dahl; Ron MiskaDate:7/11/2012 5:14 PMSubject:Re: Plan Bay Area NOP Comments

Thank you for your comments; they will be considered carefully during the preparation of the Plan Bay Area Environmental Impact Report (EIR). To stay updated on Plan Bay Area and the environmental process, please visit <u>www.onebayarea.org</u>.

Ashley Nguyen, EIR Project Manager Metropolitan Transportation Commission 101 8th Street Oakland, CA 94607 (510) 817-5809

>>> "Raives, James" <<u>JRaives@marincounty.org</u>> 7/11/2012 9:24 AM >>> Attached are Marin County Parks Comments on the notice of preparation for the draft environmental impact report for Plan Bay Area.

James Raives

SENIOR OPEN SPACE PLANNER

Marin County Parks

3501 Civic Center Drive, Suite 260

San Rafael, CA 94903

415 473 3745 T

415 473 3795 F

JRaives@marincounty.org

www.marincountyparks.org < http://www.marincountyparks.org/>

Follow us on Facebook <<u>http://www.facebook.com/MarinCountyParks</u>> and Twitter <<u>http://twitter.com/marinparks</u>> Email Disclaimer: http://marincounty.org/nav/misc/EmailDisclaimer.cfm

# MARIN COUNTY PARKS

Preservation • Recreation

MARIN COUNTY P A R K S PRESERVATION · RECREATION

COUNTY OF MARIN



Linda Dahl DIRECTOR GENERAL MANAGER

Marin County Civic Center 3501 Civic Center Drive Suite 260 San Rafael, CA 94903 415 473 6387 T 415 473 3795 F 415 473 2495 TTY www.marincountyparks.org July 11, 2012

Ashley Nguyen EIR Project Manager Metropolitan Transportation Commission 101 Eighth Street Oakland, California 94607

Subject: Plan Bay Area Environmental Impact Report

Dear Ms. Nguyen:

Thank you for the opportunity to comment on the notice of preparation for the Plan Bay Area environmental impact report (EIR). The Metropolitan Transportation Commission and the Association of Bay Area Governments are preparing a draft EIR for the region's long-range land-use and transportation plan. Plan Bay Area aims to accommodate future growth and meet state requirements to reduce greenhouse gas emissions by focusing new housing and jobs around transit.

In drafting the EIR for this plan, Marin County Parks staff requests that you consider the following issues:

- Mitigation to address significant adverse impacts to existing park, recreation, and open space areas from planned transportation and urban developments
- Measures to encourage the preservation privately owned natural areas and assist in the enhancement of publicly owned open space as a tool to mitigate for greenhouse gas and other impacts from transportation and urban development
- Evaluation of the role of parks and open space areas to reduce the adverse impacts from transportation, residential, commercial, and industrial developments, including:
  - o Sequestering carbon
  - Reducing greenhouse gas
  - o Improving public health
  - Protecting wildlife habitat, migration corridors, and linkages
  - o Preserving endangered species habitats
  - Attenuating noise and light through open space buffers
  - Protecting and enhancing water quality

PG. 2 OF 2

- Providing recreation opportunities
- Consideration of consistency with adopted city, county, and regional open space plans.

Thank you again for considering these comments. If you any questions or need more information, please contact me at (415) 473-3745 or jraives@marincounty.org.

Sincerely,

James R. Raives Senior Open Space Planner

cc: Linda Dahl Elise Holland



Midpeninsula Regional Open Space District

GENERAL MANAGER Stephen E. Abbors

BOARD OF DIRECTORS Pete Siemens Yoriko Kishimoto Jed Cyr Curt Riffle Nonette Hanko Larry Hassett Cecily Harris

July 11, 2012

Ashley Nguyen, EIR Project Manager Metropolitan Transportation Commission 101 Eighth Street Oakland, CA 94607

RE: Plan Bay Area: Environmental Impact Report - Scope and Content

Dear Ms. Nguyen:

Midpeninsula Regional Open Space District (District) is one of the largest land management agencies on the San Francisco peninsula and in the Santa Cruz Mountains with over 60,000 acres of protected public lands. Along with our sister open space agencies around the Bay Area, including East Bay Regional Parks District and Santa Clara County Open Space Authority, we have followed with great interest the progress being made throughout the Plan Bay Area planning process. The initiative is wide ranging and ambitious in its effort to plan for the long-term sustainable and livable future of the Bay Area. Open space agencies, such as ourselves, are in the unique position to play a significant conservation and preservation role in Plan Bay Area and in the words of MTC and ABAG, "ensure the stewardship of the spectacular scenic and natural resources of our region." We respectfully submit this letter in response to the call for comments regarding scope and content of the upcoming Draft Environmental Impact Report (EIR) for Plan Bay Area. We join our sister open space agencies in emphasizing the need for purposeful and proactive open space preservation and increased public recreational opportunities to counterbalance and mitigate the expansion in population, employment, and residential densities envisioned in this long range plan.

Open space and agricultural preservation are integral to effectively balance the transportation and housing needs that are described in Plan Bay Area. Enhancing the quality of life in the Bay Area over the next 25 years requires a tangible and meaningful connection between Priority Conservation Areas and Priority Development Areas. As the move towards denser urban cores accelerates, the need to offer Bay area residents easy access to a wide range of recreational opportunities and contemplative nature respite will intensify. Similarly, an increasing population places additional and more intense pressures on existing natural and recreational resources, raising the need to proactively and effectively mitigate these population and density related impacts to air and water quality, biological resources, and recreational facilities.

We urge MTC to include, in the Draft EIR and Plan Bay Area, strategies and mechanisms for expanding the rate and acreage of open space preservation and access via new recreational facilities as mitigations

for the environmental impacts that will result from the focused increase in population, employment, and residential density proposed by Plan Bay Area. These mitigations should also encompass environmental restoration projects to address potential impacts to natural habitats and wildlife populations, and to ensure the long-term livability and sustainability of the region for people, plants, and wildlife alike.

We therefore request that the following environmental issues be evaluated as part of the Draft EIR:

- Aesthetics Please evaluate the potential aesthetic impacts of increased development and density in urban cores. Mitigation that facilitates the preservation of a continuous open space greenbelt around the urban core should be considered as a way to preserve scenic views to surrounding natural, undeveloped areas and to establish boundaries between urban and wildland areas.
- Air Quality Please evaluate the open space acreage per capita and proximity of open space and parks to Priority Development Areas (PDAs) as well as the potential air quality impacts resulting from increased density in housing, transit, and transportation. Mitigation that facilitates open space preservation should be considered as a way to offset these air quality impacts through natural carbon sequestration via protected forested and vegetated landscapes. Also, mitigation that facilitates the expansion of new recreational opportunities within close proximity to PDAs should be considered as a way to improve local access to recreation thereby minimizing the vehicle miles traveled and the associated air quality impacts.
- Water Quality Please evaluate the potential water quality impacts resulting from increased development, including soil erosion as part of increased construction and maintenance activities. Mitigation that facilitates restoration projects that aim to reduce soil erosion and sedimentation (such as watershed enhancement projects) should be considered as a way to offset the potential increase in water quality impacts and creek sedimentation. Please note that many watersheds within the Bay Area are listed by the California Water Quality Control Board as sediment-impaired, thus elevating the need to address concerns regarding increased soil erosion.
- Land Use and Planning Please evaluate the potential land use impacts resulting from an increased density in housing, transit, and transportation, including impacts and inconsistencies with local general plans, conservation plans, and coastal programs. Mitigation that facilitates open space preservation and the expansion of recreational opportunities should be considered as a means of mitigating potential land use impacts.

Lastly, we would like to remind you of some of the work that the District would like to pursue over the next 25 years, which not only meet several performance targets of Plan Bay Area, but also would serve to mitigate many of the potential environmental impacts associated with the implementation of Plan Bay Area. This work includes:

- Open Space and Agricultural Land Acquisition and Preservation
  - o Expansion of Priority Conservation Areas and regional trail connections
  - o Increase in carbon sequestration opportunities and habitat connectivity
- Public Access and Facilities Infrastructure, Maintenance, and Operation
  - o Expansion of recreational opportunities, e.g. new trail projects
  - Increase in public access, e.g. new staging area projects
  - o Operation and maintenance of existing lands, trails and facilities

- Resource Management
  - o Forest management and fire management
  - o Grassland management and conservation grazing
  - o Vegetation management
  - o Rare species management and recovery
  - Water quality protection
  - o Cultural resource management

These projects, and other similar projects across the nine Bay Area counties, are in need of funding to ensure their successful implementation. Mitigation that facilitates these and other similar projects, such as through the development of new funding sources, would effectively address many of the environmental concerns that have been raised regarding the proposed densification of the PDAs.

Although MTC and ABAG depend on open space agencies to play a necessary role in creating sustainable, healthy communities and in providing vital connections to open space and opportunities to recreate in natural settings, we need to increasingly rely on partners and outside funding sources to continue our good work. Moreover, we request that MTC and ABAG place the same level of importance, focus, analysis, and funding priority to Priority Conservation Areas as that given to Priority Development Areas during the next planning cycle of Plan Bay Area. As Plan Bay Area moves forward, we look forward to working with MTC, ABAG, and our partner open space agencies to ensure that Plan Bay Area remains balanced, comprehensively addresses the intent of SB 375, and facilitates all of the systems needed to ensure a healthy and vibrant future Bay Area.

Regards,

Ana M. Ruiz, AICP

Acting General Manager Midpeninsula Regional Open Space District

Cc: The Honorable James P. Spering, MTC Planning Committee Chair The Honorable Mark Luce, ABAG Administrative Committee Chair Ezra Rapport, ABAG Executive Director Adrienne J. Tissier, MTC Commission Chair, San Mateo County Dave Cortese, MTC Commissioner, Santa Clara County Sam Liccardo, MTC Commissioner, Santa Clara County Kevin Mullin, MTC Commissioner, Cities of San Mateo County MROSD Board of Directors

From:	eircomments
To:	Tina Hugg
CC:	Ana Ruiz
Date:	7/11/2012 5:31 PM
Subject:	Plan Bay Area - Comment letter re: DEIR scope and content

Thank you for your comments; they will be considered carefully during the preparation of the Plan Bay Area Environmental Impact Report (EIR). To stay updated on Plan Bay Area and the environmental process, please visit <u>www.onebayarea.org</u>.

Ashley Nguyen, EIR Project Manager Metropolitan Transportation Commission 101 8th Street Oakland, CA 94607 (510) 817-5809

>>> Tina Hugg <<u>thugg@openspace.org</u>> 7/11/2012 4:47 PM >>> Dear Ms. Nguyen:

Please find attached a letter in response to the call for comments regarding the environmental information that will be evaluated in the upcoming Plan Bay Area Draft EIR. The hard copy has been sent by mail.

Thank you for the opportunity to provide input.

Regards,

[cid:image001.gif@01C9304D.335F52F0]

Tina Hugg, Open Space Planner <u>thugg@openspace.org</u><<u>mailto:kbritt@openspace.org</u>> Midpeninsula Regional Open Space District 330 Distel Circle, Los Altos, CA 94022 P: (650) 691-1200 - F: (650) 691-0485 <u>www.openspace.org</u><<u>http://www.openspace.org/</u>> | twitter: @mrosd<<u>http://www.twitter.com/mrosd</u>>



John Woodbury General Manager

July 2, 2012

Ashley Nguyen, EIR Project Manager, Metropolitan Transportation Commission, 101 Eighth Street, Oakland, CA 94607

#### RE: SB 375 Plan Bay Area Scoping Comments

#### Dear Mr. Nguyen:

We appreciate the work MTC is doing to prepare the Draft EIR for transportation and land use developments in the Bay Area. As part of this work, we request that the role of park and open space districts be described, quantified and incorporated into regional planning and the implementation program for SB 375.

It is essential that transportation and land use development in the region fully mitigate for significant adverse impacts on open space lands and resources. Current practices for mitigating such impacts tend to be uncoordinated and piecemeal, which limits their effectiveness. A more comprehensive, regionally-coordinated mitigation program should be considered.

Second, including the work of park and open space districts into regional planning is critical if the region is to successfully meet the carbon sequestration and greenhouse gas reduction goals of SB 275:

- By protecting and properly managing tidal marshes, coniferous forests and even grasslands, regional park and open space districts such as ours increase both the rate and the overall amount of carbon sequestration, and reduce the potential for catastrophic releases of carbon due to wildfire.
- By providing parks and significant outdoor recreation opportunities close to home, we help reduce the number and distance of vehicle trips, which are the primary source of human-generated carbon in the atmosphere.

In providing these important benefits which are directly related to achieving the goals of SB 375, we also provide considerable ancillary benefits, including health benefits getting people out of their cars and exercising, protection of wildlife through preservation of habitats and habitat linkages, protecting and enhancing water quality and water quantity, creation of jobs in conservation, and much more.

For these reasons, we request that the 'Financial Incentives' for protecting Natural Resource areas, that are discussed in SB375, be included as Mitigation Measures in the Draft EIR. We further request that the Draft EIR quantify the benefits of land conservation for achieving the goals of SB 375 or, if such quantification is not possible due to lack of data, that the Draft EIR include a mitigation requirement that funding and resources be allocated to develop the scientific data needed to quantify these benefits, so this information can be incorporated into the next regional plan.

Thank you for your consideration.

Sincerely,

John Woodbury General Manager Napa County Regional Park and Open Space District

sh Wordsing

cc: Commissioner Bill Dodd, Napa County Steve Heminger Ann Flemer

From:	Ashley Nguyen
To:	Paul Campos; eircomments
Date:	7/10/2012 10:49 AM
Subject:	Re: Scoping Notice Error/Request for Extension

Hi Paul:

Thanks for letting me know about the transposed numbers on page 10 of the NOP. The sentence, when corrected, will read as: "MTC will use the latest planning assumptions in the EIR analysis, as well as the same regional growth control totals of 2,147,000 new people, 1,120,000 new jobs, and 660,000 new housing units except for Alternative 4 (see Alternative 4 for details)." Note that the regional growth numbers on page 7 of the NOP are correct.

I will post the corrected sentence on onebayarea.org but will not be extending the comment period on the NOP.

Again, thanks for your input.

Ashley Nguyen Senior Transportation Planner/Analyst Metropolitan Transportation Commission 101 Eighth Street | Oakland, CA 94607 Tel. 510.817.5809 | Fax 510.817.5848

>>> Paul Campos campos@biabayarea.org> 7/7/2012 9:31 PM >>> Dear Ms. Nguyen,

In the process of preparing comments on the Plan Bay Area Notice of Preparation, I discovered material errors in the core demographic information provided to the public in the NOP. On Page 7, the NOP provides that the Proposed Project is based on the Bay Area "add[ing] over 2 million people, 1.1 million new jobs, and 660,000 housing new housing units between 2010 and 2040." On page 10, however, the NOP states that the proposed Project and draft alternatives will use "regional growth totals of 1,120,000 new people, 2,147,000 new jobs, and 660, 000 new housing units excerpt for Alternative 4."

These discrepancies in the projected additional jobs and population are vast. It is not possible to submit fully informed comments on the NOP in light of these discrepancies. I therefore respectfully request that you issue an amended NOP that consistently uses the correct demographic information, and extend the public comment period by at least one week.

Thank you,

Paul Campos Sr. Vice President, Governmental Affairs General Counsel Building Industry Association of the Bay Area pcampos@biabayarea.org (mailto:YourEmail@gmail.com) 925.951.6840 (Main Office) 925.951.6844 (Office Direct) 415.223.3775 (Mobile)

101 Ygnacio Valley Road, Suite 210 Walnut Creek, CA 94596 ------555 California Street, 10th Floor San Francisco, CA 94014

\* \* \* \* \* \* \* \*

July 11, 2012

#### VIA ELECTRONIC MAIL (eircomments@mtc.ca.gov) Ashley Nguyen, EIR Project Manager Metropolitan Transportation Commission (MTC) Joseph P. Bort MetroCenter

101 8th Street Oakland CA 94607

#### **RE: Scoping Comments for Plan Bay Area EIR**

Dear Ms. Nguyen:

As a supplement to feedback we have provided in recent meetings with MTC and ABAG staff, we write to submit brief comments on the Notice of Preparation (NOP) of a Draft Environmental Impact Report (dEIR) for Plan Bay Area—the region's transportation plan and Sustainable Communities Strategy. Our specific comments on the NOP and scoping document are below, and we incorporate by reference our previous correspondence relating to Plan Bay Area.<sup>1</sup>

## **1.** Analyze and address the *distribution* of environmental impacts and any disparities affecting low-income people and people of color, to ensure that the benefits and burdens of Plan Bay Area are fairly distributed.

Under state law, "environmental justice" means the fair treatment of people of all races, cultures, and incomes with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations, and policies. (Gov. Code, § 65040.12, subd. (e).) Fairness in this context means that the *benefits* of a healthy environment should be available to everyone, and the *burdens* of pollution or inequitable investments should not be focused on sensitive populations or on communities that already are experiencing its adverse effects.<sup>2</sup> "Environmental justice cannot be achieved . . . simply by adopting generalized policies and goals. Instead, environmental justice requires an ongoing commitment to identifying existing and potential problems, and to finding and applying solutions, both in approving specific projects and planning for future development."<sup>3</sup>

Under CEQA, an agency is required to find that a "project may have a 'significant effect on the environment" if, among other things, "[t]he environmental effects of a project will cause substantial adverse effects on human beings, either directly or indirectly[.]" (Pub. Res. Code, §

<sup>&</sup>lt;sup>1</sup> Including correspondence on the following dates: <u>August 23, 2010</u>, <u>October 8, 2010</u>, <u>October 26, 2010</u>, <u>June 21, 2011</u>, <u>August 10, 2011</u>, <u>September 2, 2011</u>, <u>October 26, 2011</u>, <u>November 18, 2011</u>, and <u>April 25, 2012</u>.

<sup>&</sup>lt;sup>2</sup> Kamala D. Harris, Attorney General, *Environmental Justice at the Local and Regional Level*, available at: <u>http://oag.ca.gov/sites/all/files/pdfs/environment/ej\_fact\_sheet.pdf</u>.

<sup>&</sup>lt;sup>3</sup> *Id*.

21083, subd. (b)(3); see also CEQA Guidelines, § 15126.2)<sup>4</sup> CEQA and its Guidelines include provisions that call for analysis of whether environmental and public health burdens might affect certain communities, including environmental justice communities. For instance, a lead agency should take special care to determine if a proposed project will expose "sensitive receptors" to pollution; if it will, the impacts of that pollution are more likely to be significant (e.g., a proposed project that is ordinarily insignificant in its impact on the environment may be considered significant in a particularly sensitive environment such as a community already exposed to higher-than-average burdens).<sup>5</sup> Moreover, "CEQA requires a lead agency to consider whether a project's effects, while they might appear limited on their own, are 'cumulatively considerable' and therefore significant."<sup>6</sup> (Pub. Res. Code, § 21083, subd. (b)(3).)

The Plan Bay Area dEIR should explicitly and robustly identify, analyze, and address mitigations for, impacts that disproportionately affect low-income people and people of color in the Bay Area. This includes the impacts, disaggregated by race and income, related to: inequitable access to transit, high transportation and housing cost burdens, lack of affordable housing (or poor jobs-housing fit), risk of direct and indirect displacement, and other public health factors (including those related to air quality, access to active transportation, and related chronic diseases). Many of these track the issues analyzed under the MTC/ABAG-adopted Performance Targets/Targets Scorecard, Equity Analysis Measures, and Regional Indicators.

# 2. Ensure that the tools and models used to analyze the dEIR alternatives are sensitive to differences among the behaviors of and the project/policy impacts on low-income people and people of color, and adopt appropriate mitigation measures to address these differences.

As we have discussed in meetings with MTC/ABAG staff, if the modeling tools used to analyze the Plan Bay Area EIR alternatives do not account for the differences in vehicle miles traveled (VMT) among different economic and racial segments of the population, the environmental impacts of project attributes such as affordable housing distribution, anti-displacement policies, and inadequate transit will not be accurately measured or considered in the dEIR. This may not only lead to inaccuracies in determining the significance of impacts, it would overlook several of the policy priorities that MTC's and ABAG's governing boards have adopted as performance targets and equity analysis measures. For instance, a UC Davis analysis of MTC/ABAG's own data shows that a more equitable distribution of affordable housing across the region would reduce VMT and greenhouse gas emissions (GHG); and that, without mitigations, Plan Bay Area could result in higher VMT and GHG by displacing the very residents who use transit most –

<sup>&</sup>lt;sup>4</sup> *Id. See also*, CEQA Guidelines (Cal. Code Regs., tit. 14, §§ 15000, et seq.), available at <u>http://ceres.ca.gov/ceqa/</u>.

<sup>&</sup>lt;sup>5</sup> *Id., see also* CEQA Guidelines, App. G.

<sup>&</sup>lt;sup>6</sup> *Id*.

low-income families and those living in affordable housing.<sup>7</sup> The dEIR and its tools should take into account such issues and the following factors, among others:

- a. Deed-restricted affordable housing inventory and related impacts
- b. The impact of policies such as a housing overlay zone,<sup>8</sup> just cause eviction and fair rent ordinances, and other affordable housing and anti-displacement policies
- c. The impact of the reliability, accessibility and affordability of transit for communities of concern<sup>9</sup>
- d. The sprawl-inducing impacts of Plan Bay Area, with specific focus on the environmental impacts resulting from leap-frogging of low-income residents to the outer suburbs of the region<sup>10</sup>
- e. The VMT of lower-income residents in affordable housing, which tends to be lower than the VMT of more affluent auto-owning residents<sup>11</sup>
- f. Jobs-housing fit<sup>12</sup> of each EIR alternative by income level to determine whether the plan indeed encourages development of workforce housing that would reduce VMT and GHG emissions<sup>13</sup>

<sup>10</sup> See Federal Reserve Bank of San Francisco, Suburbanization of Poverty in the Bay Area (Jan. 2012), available at <u>http://www.frbsf.org/publications/community/research-briefs/suburbanization-of-poverty.cfm</u>. The study warns that PDA development without safeguards to preserve affordable housing could hasten the trend towards suburbanized poverty. (p. 10.)

<sup>11</sup> See Pollack, et al. report 12-13 (Dukakis Center for Urban and Regional Policy, Oct. 2010), available at <u>http://nuweb9.neu.edu/dukakiscenter/wp-content/uploads/TRN\_Equity\_final.pdf</u>. See also Karner, Niemeier (UC Davis) May 24, 2012 memo, available at:

http://www.publicadvocates.org/sites/default/files/library/comments\_on\_revised\_proposed\_guidelines\_fo r\_sb\_226\_ceqa\_streamlining.pdf. Studies show that low-income residents living near transit have lower VMT and lower car ownership rates than the affluent residents that tend to move in after transit-oriented investments in those areas.

<sup>12</sup> Jobs-housing fit takes into account the relationship between wages and housing costs in a particular location. It begins with the "jobs-housing balance," which identifies the ratio of jobs to housing units in

<sup>&</sup>lt;sup>7</sup> *See* memo by Alex Karner and Deb Niemeier of UC Davis, May 24, 2012, available at: <u>http://www.publicadvocates.org/sites/default/files/library/comments\_on\_revised\_proposed\_guidelines\_for\_sb\_226\_ceqa\_streamlining.pdf</u>.

<sup>&</sup>lt;sup>8</sup> See Public Advocates and EBHO, *Factsheet: Housing Overlay Zones*, available at <u>http://www.publicadvocates.org/sites/default/files/library/affordable\_housing\_overlay\_zone\_fact\_sheet\_7</u>-27-10.pdf.

<sup>&</sup>lt;sup>9</sup> See Stephanie Pollack, Barry Bluestone & Chase Billingham, *Maintaining Diversity in America's Transit-Rich Neighborhoods: Tools for Equitable Neighborhood Change* (Dukakis Center for Urban and Regional Policy, Oct. 2010), available at <u>http://nuweb9.neu.edu/dukakiscenter/wp-</u>

<sup>&</sup>lt;u>content/uploads/TRN\_Equity\_final.pdf</u>. *See also* Karner, Niemeier (UC Davis) May 24, 2012 memo, available at:

http://www.publicadvocates.org/sites/default/files/library/comments\_on\_revised\_proposed\_guidelines\_fo r\_sb\_226\_ceqa\_streamlining.pdf. The Dukakis Center study shows that transit-oriented development without protections for low-income residents and residents of color attracts higher-income residents with greater car ownership rates and lower transit-usage rates. (p. 24) While TOD tends to reduce the VMT of all residents, the VMT reductions are greater among low-income residents. (Karner, Niemeier memo, p. 4)

Inadequate housing options force large numbers of low-income residents to drive long distances to work. Failure to plan for affordable housing near jobs only exacerbates this problem, frustrating the environmental goals of Plan Bay Area. In light of research showing the VMT benefits of equitably distributed and properly placed affordable housing (as distinct from market rate housing),<sup>14</sup> MTC/ABAG should adjust or supplement modeling data to ensure accurate accounting of the GHG impacts of affordable housing. MTC/ABAG should also analyze the jobs-housing fit of each alternative to determine whether it provides adequate workforce housing for all economic groups, particularly low wage workers who would most likely walk, bike, or take local transit to work. Finally, before adopting the final plan, MTC/ABAG should adopt mitigation measures that address these issues (e.g., improve jobs-housing fit) and that improve Plan Bay Area's performance on the equity measures, targets and indicators that the agencies have adopted. These mitigations should include affordable transit, housing and anti-displacement measures.

### **3.** Conduct as part of the EIR a Health Impact Assessment to study the health impacts of the proposed Plan and the alternatives.

A Health Impact Assessment (HIA) is a "combination of procedures, methods and tools that systematically judges the potential, and sometimes unintended, effects of a policy, plan, program or project on the health of a population and the distribution of those effects within the population."<sup>15</sup> An HIA identifies appropriate actions to manage those effects. MTC/ABAG should conduct an HIA that, at a minimum, considers and identifies mitigations for the public health effects and disparities related to transit connectivity (reliability, accessibility, and affordability), availability of affordable housing (including the amount of affordable housing in healthy and high-opportunity areas), and displacement risk.

#### 4. Study the Equity, Environment and Jobs (EEJ) Scenario as one of the dEIR alternatives.

We will continue to work with MTC/ABAG staff to develop this alternative and commend staff for including this as one of the alternatives to be studied. In order to ensure that this alternative is

that location, and disaggregates it by income level. A January 2012 analysis by ABAG found poor jobshousing fit in numerous Bay Area cities.

<sup>&</sup>lt;sup>13</sup> See Robert Hickey (Non Profit Housing Association of Northern California, NPH), *Miles From Home*, available at: <u>http://livelocalmarin.org/wp-content/uploads/2011/02/MilesFrHome-Final-2-22.pdf</u>. This study shows that all but two Bay Area counties have more than 40% of their total workforce commuting in from other counties. (p. 3) In affluent counties like Marin, the majority of in-commuters are low-income workers. In Marin County, 54% of in-commuters earn less than \$40,000, which is insufficient to cover the cost of renting the average 1-bedroom apartment in the county. (p. 7) These high in-commuting numbers result in greater congestion on the freeways, more VMT, and severe climate impacts. Marin County's workforce alone dumps 2.37 million pounds of carbon dioxide into the air daily. (p. 5)

<sup>&</sup>lt;sup>14</sup> See Karner, Niemeier May 24, 2012 memo.

<sup>&</sup>lt;sup>15</sup> 1999 Gothenburg consensus statement. *See* U.S. Centers for Disease Control and Prevention, *Health Impact Assessment*, available at: <u>http://www.cdc.gov/healthyplaces/hia.htm</u>.

given adequate consideration, we request that we have equal opportunity to use the modeling tools to iteratively develop the EEJ alternative that the other alternatives will be given.

As expressed to MTC/ABAG staff, the EEJ alternative should study the benefits (including GHG reduction, increased housing + transportation affordability, reduced displacement risk and other Plan Bay Area measures) of reducing displacement and bringing low-wage jobs, affordable housing and improved local transit together. It plans more affordable housing not only in existing PDAs, but also near low-wage jobs in transit-connected communities of opportunity ("PDA–like" places); it also runs more frequent local transit service by shifting available transportation funds to transit operations. Specifically:

- a. <u>Land-Use:</u> This alternative should modify the PDA-focused land-use map of the "Jobs-Housing Connection" Alternative (Proposed Project) by shifting a portion of the lower-income housing from PDAs in the three large cities to suburban cities that have at least two of the following characteristics:
  - 1. Cities with a poor jobs-housing fit.
  - 2. Cities with above-average transit-connectivity.
  - 3. High opportunity cities.

The EEJ alternative should also include community stabilization policies and incentives that protect against the indirect and direct displacement of existing low-income communities and communities of color from urban to exurban areas, and policies that incentivize affordable housing.

b. <u>Transportation</u>: Complementing the land-use distribution in the EEJ Alternative should have a more robust local transit network. The EEJ Alternative should emphasize operating higher levels of local transit service by shifting approximately \$6 billion in regional transit funds to operating assistance. This shift should be used to provide more frequent service on the most productive routes that serve Communities of Concern and/or link Communities of Concern to job centers (like the transit network contemplated in EIR Alternative 4), while also increasing transit service levels somewhat on key routes serving less dense "PDA-like" places – those that meet two of three of the EEJ land use criteria above which the EEJ's land-use map targets for more housing growth.

## 5. Consult stakeholders, including environmental justice and equity stakeholders, on issues relating to prospective CEQA streamlining for Transit Priority Projects (TPP) and TPP areas.

As MTC and/or ABAG develop guidelines for and consider application of SB 375's CEQA streamlining incentives for Transit Priority Projects (TPPs), staff should consult EJ and equity stakeholders for identification of TPPs and how to ensure that CEQA streamlining does not disproportionately impact vulnerable low-income residents and residents of color.

We will continue to participate in discussions about Plan Bay Area in the upcoming months and look forward to seeing our comments addressed in the dEIR and later in the Final EIR.

Thank you for your consideration,

RUN Papeli •

Richard Marcantonio and Parisa Fatehi-Weeks **Public Advocates** 

Carl Anthony and Paloma Pavel **Breakthrough Communities** 

Bob Allen **Urban Habitat** 

From:	Ashley Nguyen	
To:	Brenda Dix; Stefanie Hom	
Date:	7/9/2012 3:38 PM	
Subject:	Fwd: DDDC General Scoping Plan Comments on the EIR	
Attachments:	DDDC General Scoping Plan Comments.doc	

See attached. Pls keep with other written correspondence, and forward to Hannah.

Ashley Nguyen Senior Transportation Planner/Analyst Metropolitan Transportation Commission 101 Eighth Street | Oakland, CA 94607 Tel. 510.817.5809 | Fax 510.817.5848

>>> "Azibuike Akaba" <azibuike@rampasthma.org> 7/6/2012 4:03 PM >>>

Good afternoon Mr. Hemminger,

We'd like to thank you, your staff and the ABAG staff for working with us as we endeavor to understand and engage in this phase of the general scoping plan and the Environmental Impact Report. We look forward to a productive discussion and a thorough examination of the proposed alternative scenarios to be considered in up coming weeks and finally in December.

We, The Ditching Dirty Diesel Collaborative, have drafted the attached letter with specific comments for the general scoping plan for the Environmental Impact Report.

Please consider these comments in light of the absence of more detailed public health recommendations that should be included and considered when evaluating both the transportation and land use conflicts in the proposed scenarios. Our goal is to present a set of cogent public health recommendations for your staff to build upon and to incorporate into the final scenarios that will protect existing and future communities that could be adversely impacted by the proposed development.

We welcome your written responses to so we can bring them back to the various community based organizations that have expressed interest in this laborious and important process.

Thank you for your time and the outstanding work that your staff has done in including public comments thus far.

Sincerely,

Azibuike

Azibuike Akaba Policy Associate Regional Asthma Management and Prevention (RAMP) A Project of the Public Health Institute 180 Grand Ave., Suite 750 Oakland, CA 94612 Phone: 510-302-3346 ( blocked::tel:510-302-3346 )/ 510-488-4454 ( blocked::tel:510-488-4454 ) cell Fax: 510-451-8606 ( blocked::tel:510-451-8606 ) azibuike@rampasthma.org ( blocked::https://mail.google.com/mail/h/1v5ttxjlhreb6/?&v=b&cs=wh&to=azibuike@rampasthma.org ) www.rampasthma.org ( blocked::http://www.rampasthma.org/ ) Steve Hemminger

**Executive Director** 

Metropolitan Transportation Commission 101 Eighth Street Oakland, CA 94607

Dear Mr. Hemminger:

Thank you for the opportunity to comment on the scoping for the Plan Bay Area draft Environmental Impact Report. The Ditching Dirty Diesel Collaborative (DDDC) is a regional collaborative dedicated to reducing the impacts of diesel pollution on the health of Bay Area residents, especially low-income and minority communities that often live closest to the sources of diesel pollution. As such, DDDC has consistently advocated for one simple concept throughout the development of the Bay Area Sustainable Communities Strategy (SCS) – don't repeat the mistakes of the past by allowing new sensitive receptors like homes, day care centers, hospitals, schools and senior centers to be built in the highest risk areas nearest sources of diesel pollution such as highways, freight distribution centers, ports and rail yards. Many scientific studies over the last 15 years have shown that health risks such as increased asthma attacks, cardiovascular disease and cancer are greater for people living nearer to these sources of diesel pollution than for those living further away.

The Jobs-Housing Connection Scenario approved earlier this year for the Bay Area Sustainable Communities Strategy predicts the Bay Area will add 660,000 housing units over the next 28 years. For reasons such as proximity to transit and affordability of land, many of these new housing units will likely be proposed to be built in the highest risk areas closest to sources of diesel pollution. DDDC strongly believes that the Sustainable Communities Strategy has an obligation to address these potential Environmental Justice health impacts by reducing or eliminating the number of these predicted new homes and other sensitive receptors that could potentially be built too close to these sources of pollution, and ensuring that adequate mitigations are put in place for those homes and sensitive receptors that end up being placed too close to these sources.

Therefore, Ditching Dirty Diesel Collaborative requests that the Plan Bay Area draft Environmental Impact Report include for each Alternative Scenario:

An analysis of the number of new residential units and other sensitive receptors likely to be built in the areas at highest risk from the impacts of diesel pollution.

1. A Health Impact Assessment for the people occupying those new housing units or other sensitive receptors in those high risk areas, including increased risk of cancer, lung disease, and cardiovascular disease; increased prevalence of asthma and asthma attacks; loss of sleep; and the health impacts from noise and vibration, including mental health impacts.

- 2. A comparison of the demographics of the people likely to occupy new housing units or utilize sensitive receptors located in those high risk areas in terms of race, age, income level and educational attainment to those people likely to occupy the rest of the new proposed housing units and sensitive receptors built in the Bay Area as part of the SCS.
- 3. Proposed mitigations measures that would keep housing units and other sensitive receptors from being built in the highest risk areas, or would provide protection from the impacts of diesel pollution for the people living in or using sensitive receptors in the highest risk areas.
- 4. An analysis of the health impacts from the increased usage of public transportation, biking and walking resulting from implementation of the SCS due to their proximity to the freight transportation and distribution infrastructure.

We recommend you use the CEQA guidelines adopted by the Bay Area Air Quality Management District in June, 2010 to determine thresholds of significance in your EIR for these issues.

Please contact Azibuike Akaba, (510) 302-3346 if you have any questions regarding these comments.

Thank you for your attention to issues, and we look forward to the analysis of them in the draft Environmental Impact Report.

Sincerely,

Azibuike Akaba, on behalf of the Ditching Dirty Diesel Collaborative

Azibuike Akaba Policy Associate Regional Asthma Management and Prevention (RAMP) A Project of the Public Health Institute 180 Grand Ave., Suite 750 Oakland, CA 94612 Phone: \_510-302-3346. Fax: <u>.510-451-8606</u> <u>azibuike@rampasthma.org</u> <u>www.rampasthma.org</u> Working together to reduce the burden of asthma

cc. Kenneth Kirkey,

David Ory,

Dave Vautin

Ashley Nguyen



Edwin M. Lee, Mayor Philip A. Ginsburg, General Manager

June 26, 2012

Ashley Nguyen EIR Project Manager Metropolitan Transportation Commission 101 Eighth Street Oakland, CA 94607

RE: Notice of Preparation - Draft Environmental Impact Report for Plan Bay Area (SB 375)

Dear Ms. Nguyen:

Thank you for the opportunity to provide scoping comments for the content of the Draft Environmental Impact Report (DEIR) for SB 375 Plan Bay Area. The San Francisco Recreation and Parks Department stewards over 4,000 acres of open space that includes urban parks, playgrounds, recreation centers, sensitive habitat and natural areas. As such, we offer numerous environmental protection, conservation and enhancement opportunities in an urban environment. Those opportunities are well aligned with the requirement, created by The Sustainable Communities and Climate Protection Act of 2008 (SB 375), which requires regional transportation plans such as Plan Bay Area to consider meaningful financial incentives for protecting vital natural resources.

The following factors need to be considered in the DEIR for the Plan Bay Area:

- It will be critical to fully mitigate for significant adverse impacts on Parks, Recreation, Open Space and Greenfields.
- The 'Financial Incentives' for protecting Natural Resources areas, that are required by SB 375, need to be included as Mitigation Measures.
- Mitigation Measures also need to acknowledge and include the role that Natural Resources areas and Open Space Conservation play in mitigating adverse impacts from Transportation & Land Use Developments. These include:
  - Carbon sequestration, especially in tidal marsh and coniferous forest and properly managed grasslands
  - Greenhouse gas reduction through trip reduction
  - Health benefits by getting people out of their cars
  - Protection of wildlife habitat, migration corridors and linkages
  - o Restoration of habitats to mitigate for development
  - Attenuation of noise and light through open space buffers
  - Preservation of scenic open space enhancing property values
  - Protecting and enhancing water quality
  - Recreation opportunities
  - Creation of jobs in conservation
  - o Preventing development of seismically unstable areas

McLaren Lodge in Golden Gate Park | 501 Stanyan Street | San Francisco, CA 94117 | PHONE: (415) 831-2700 | WEB: sfreepark.org

• Mitigation measures also need to address any conflicts with adopted City, County and Regional Open Space Plans and Elements.

The San Francisco Recreation and Park Department is a natural partner for agencies seeking to meet the requirements of SB 375 in that we work to conserve and preserve open space in a densely population urban environment. We undertake projects ranging from habitat restoration on Twin Peaks to the development of a truly green transportation, power and water system throughout out park system. The following summary of Recreation and Park project can all be considered as forms of the Mitigation Measures identified above:

- Habitat Restoration and Stewardship: Protect, restore and enhance wetland, riparian, oak woodland, coastal prairie and other critical habitats in the San Francisco Recreation and Park Department's Significant Natural Resource Areas. Enhance habitat to endangered, threatened, rare and common species throughout the 32 Natural Areas. Develop and augment stewardship efforts of natural areas by working with volunteers, neighbors and community members to implement all elements of restoration including invasive plant removal, revegetation and erosion control. Perform maintenance of natural areas to conserve and promote biodiversity, control erosion and improve water quality.
- Urban Trail Enhancements: Restore and improve the urban trail system using erosion control, tree planting, signage and trail edging. Connect existing trails with new trails to create urban trail network. Improve trails in areas such as India Basin Shoreline, Balboa Natural Area, Golden Gate Heights Park and Hawk Hill.
- Urban Open Space Acquisition and Conservation: Acquire and improve new open spaces for park use, identified through a community process. Develop new parks in dense urban neighborhoods and along the San Francisco shoreline. Provide new access to unique waterfront habitat, conservations and educational opportunities. Protect and increase habitat for native species.
- Get Out and Play Initiative: Establish programs and signage to educate residents and visitors about our urban trails, parks and sensitive natural habitat. Promote public awareness of the advantages of exercise, volunteerism and the connection between urban open spaces and healthy communities.
- Green Infrastructure Transportation, Power and Water: Install multi-modal permeable pavements, state-of-the-art efficient electrical and irrigation, and water storage systems. Provide efficient, very low or no-impact self-supporting green park infrastructure. Replace aging, dilapidated park roads and pathways into multi-modal greenways for cars, pedestrians, bikes and greenspace, which capture, treat and use stormwater to self-irrigate. Capture and store rainwater for irrigation needs, reduce stormwater flows throughout San Francisco, decreasing flooding in developed areas, prevent discharges of sewage into the bay and saving millions of gallons of potable water and energy. Replace and modernize lighting and electrical systems to reduce power needs, use more directed light for less impact to habitat and "night sky," implement solar power throughout the system and reduce carbon emissions and provide energy cost savings.

• Urban Forestry: Invest in and maintain the over 131,000 trees in the city's urban forest. Restore health of trees and provide an urban forest that will develop over time to provide long-term sustainable carbon sequestration.

Sincerely Ginsburg General Manager

From:Ashley NguyenTo:Stefanie HomDate:7/12/2012 5:08 PMSubject:Fwd: SFCTA comments on RTP/SCS EIR

Ashley Nguyen Senior Transportation Planner/Analyst Metropolitan Transportation Commission 101 Eighth Street | Oakland, CA 94607 Tel. 510.817.5809 | Fax 510.817.5848

>>> Tilly Chang <tilly.chang@sfcta.org> 7/12/2012 4:51 PM >>>

Ashley and Ken,

Thank you for the opportunity to provide comments on the RTP/SCS EIR Notice of Preparation. While we will not be submitting a formal letter, we share the following staff comments for your consideration:

1. We support the use of UrbanSim as an analytical approach to test "what it will take" to achieve a land use distribution that meets our RTP/SCS goals. This tool is a major improvement over the previous methodology for projecting land use distributions in terms of its technical basis and transparency.

2. **Include transit crowding as a transportation impact measure studied in the EIR (at least for BART and Muni).** As MTC's own analysis has shown, the Draft Preferred Scenario results in severe capacity issues in the Muni Metro system (see comment 3 below). The Final Preferred Scenario adds even more housing and jobs to SF and the region's core which could result in even greater crowding. Analysis of transit crowding is necessary to understand "what will it take" to achieve the SCS goals. We look forward to working with MTC on revenue advocacy measures that would address the need for more operating funds for transit, and having crowding analysis results will be important to that effort.

3. **Test increased levels of Muni service in scenarios 4 and 5.** We support the inclusion of transit service level restorations for Muni and transit providers in scenarios 4 and 5. Can you please confirm what levels of service restoration these scenarios include (2005 levels)? In addition, the Transit Effectiveness Project, as San Francisco's "Comprehensive Operations Analysis", is already included in the Preferred Scenario. However, we know that additional transit service frequency will be needed to accommodate the level of transit demand generated by the growth forecast in the RTP/SCS. We request that Scenarios 4 and 5 test an additional level of frequency increase on Muni and BART (perhaps a refinement of the BART Metro assumptions). We are happy to work with SFMTA and BART staff to provide a definition for testing in the EIR.

4. Test increased levels of upzoning along the Caltrain corridor. The draft upzoning scenarios presented to CMA and local jurisdiction staff showed much higher levels of upzoning to be tested in the BART and Muni Metro corridors than in the Caltrain corridors. While we understand that the criterion that MTC staff used was focused on frequencies and span of service, and Caltrain is largely a commuter rail service as compared to an all-day service, we advise that the upzoning scenario should consider the quality/speed of service in addition to its schedule. Even with less frequent off-peak and weekend service, the Caltrain corridor is a strong candidate for focused growth, especially in areas with neighborhood-serving retail and other local-serving land uses.
5. We support studying road user pricing in Scenario 4. Countless analyses have indicated the high effectiveness and cost effectiveness in achieving GHG reduction through transportation pricing. We support including expanded pricing in this alternative to educate the public and policymakers and prompt additional regional policy discussions about the appropriate use of this strategy.

Our colleagues at the Planning Department (copied) are seeking an opportunity to speak with MTC and ABAG staff to discuss the land use and CEQA streamlining aspects of the RTP/SCS EIR, and may submit comments on these areas separately in the future.

Thank you again, Tilly

Tilly Chang Deputy Director for Planning San Francisco Transportation Authority p. 415.522.4832 | t ( http://www.sfcta.org )illy.chang@sfcta.org

We have moved. Please note new street address and zip code below, effective July 2, 2012. 1455 Market Street, 22nd Floor San Francisco, CA 94103



6980 Santa Teresa Blvd., Suite 100 • San Jose, CA 95119 tel 408.224.7476 • fax 408.224.7548 www.openspaceauthority.org

July 6, 2012

Ashley Nguyen, EIR Project Manager Metropolitan Transportation Commission 101 Eighth Street Oakland, CA 94607

Dear Ms. Nguyen,

As a special district focused on the protection and stewardship of open space, natural resources and farmland in Santa Clara County, the Open Space Authority appreciates the opportunity to comment on the EIR Scoping for Plan Bay Area. As the Metropolitan Transportation Commission (MTC) and the Association of Bay Area Governments (ABAG) move forward with the Plan Bay Area effort and prepare to invest more than \$250 billion into our economy over the next 25 years, it is critical that the protection and enhancement of vital natural resource areas in the region be addressed.

The protection and stewardship of open space, natural resource lands and farmland in the regional Plan Bay Area efforts is an important tool to reduce greenhouse gasses and support a holistic approach to transportation and land use planning.

In preparing the draft EIR for transportation and land use developments in the Bay Area, it will be critical to fully mitigate for significant adverse impacts on parks, open space and farmland. Mitigation measures also need to acknowledge and include the role that natural resource areas and open space conservation play in mitigating adverse impacts from transportation and land use developments. These include:

- Carbon sequestration, especially of tidal marsh and coniferous forest and properly managed grasslands;
- Greenhouse gas reduction through trip reduction
- Health benefits of getting people out of their cars
- Protection of wildlife habitat, migration corridors and linkages
- Preservation of endangered species habitats
- Restoration of habitats to mitigate for development
- Attenuation of noise and light through open space buffers
- Preservation of scenic open space enhancing property values
- Protecting and enhancing water quality
- Recreation opportunities
- Creation of jobs in conservation
- Keeping agriculture viable
- Preventing development of seismically unstable areas

- Financial incentives for protecting natural resource areas that are required by SB375 also need to be included as mitigation measures.
- Mitigation measures also need to address any conflicts with adopted City, County and regional open space plans and elements.

Thank you for creating a plan for a thriving and sustainable Bay Area, and for the opportunity to share our comments.

Sincerely, andua machingi

Andrea Mackenzie General Manager

cc: Board of Directors, Santa Clara County Open Space Authority



July 12, 2012

Ashley Nguyen, EIR Project Manager Metropolitan Transportation Commission Joseph P. Bort MetroCenter 101 Eighth Street Oakland, CA 94607-4700

#### Subject: Notice of Preparation of a Draft Environmental Impact Report for Plan Bay Area

Dear Ashley:

Thank you for the opportunity to comment on the Notice of Preparation (NOP) for the Draft Environmental Impact Report (EIR) for Plan Bay Area, prepared by the Metropolitan Transportation Commission (MTC). The Santa Clara Valley Transportation Authority (VTA) offers the following comments on the NOP.

#### UrbanSIM Model

VTA continues to have questions about the accuracy, utility, and methodology being associated with the UrbanSIM model, and its linkage with MTC Travel Demand Forecasting model. We would like to see the model at a more fully developed stage (calibrated and tested) before being used as a critical tool in developing land use scenarios that will have such wide reaching implications for transportation agencies and local jurisdictions.

In addition, our understanding of the methodology being proposed is to use UrbanSIM Model with the alternatives currently proposed in the EIR; which implies that the location and intensity of development is currently unknown with Alternatives 3, 4 and 5, and the location and intensity of development within Priority Development Areas (PDAs) of the adopted Preferred Land Use scenario may change. We urge MTC formulate a process for vetting any new information that comes from the RTP EIR process, and to allow sufficient time within the schedule to allow that to occur.

#### **EIR** Alternatives

1. The Environmental Impact Report (EIR) clearance should focus on alternatives that are practical and implementable. Accordingly, the focus should be on Alternative 2, which is based on the Preferred Land Use Alternative and Transportation Investment Strategy that was approved by MTC and ABAG in May 2012. This Alternative has gone through a significant vetting process and represents the most constrained alternative in both land use and transportation and it is the most realistic. In addition, for purpose of comparing these to other alternative and testing the value of the various policy considerations, it is important to hold both the land use and transportation network constant and not to make further changes to

Ms. A. Nguyen July 12, 2012 Page 2

Alternative 2 datasets. The preferred alternative should be tested with the preferred transportation investment strategy both with and without the recommended climate policy initiatives.

- 2. Alternatives 3, 4 and 5 should be assessed within the context of an Alternative Planning Strategy (APS). Accordingly, MTC should evaluate the need to environmentally clear these alternatives.
- 3. VTA recommends testing two additional alternatives: the first based on the local adopted general plans of each jurisdiction; the second more concentrated growth in a fewer amount of core areas (e.g. a less even distribution across all Priority Development Areas) that have high levels of transit access. VTA has tested such a scenario in its model and the results were very informative. Testing these two alternatives would better frame the range alternatives (i.e., most and least practical land use scenarios) and allow MTC to better determine the effect of the proposed policy measures under consideration. These should also be assessed within the context of an APS.
- 4. Alternative 3 would require transfer of funds from certain program areas to make investments in AC Transit and BART. As stated in the MTC memo date July 9, 2012, the transfer of funds could "adversely affect transit service by removing funding for arterial signal timing and transit capital rehabilitation projects", and these impacts should be fully examined. The EIR should provide a comprehensive analysis on the impacts of this fund transfer on transit service in areas not served by AC Transit or BART and the congestion impacts resulted from the lower funding level in many key improvements.
- 5. Although not explicitly stated, Alternative 5 implies significant unidentified funding would be available to subsidize the additional affordable housing units. While examination of this alternative is valuable on many levels, MTC should consider the issues that may be involved with presenting what amounts to an unconstrained land use scenario with a financially constrained transportation scenario. Further, as expressed previously, VTA opposes the transfer of transportation funds to non-transportation uses.

#### **CEQA** Streamlining

VTA fully embraces to intent of SB 375 to facilitate construction or higher-density mixed use development in urban cores and along major transit facilities. We do, however, have a number of questions about the streamlining process and how it will be implemented by MTC:

- 1. This is a programmatic EIR while the CEQA streamlining is intended to provide projectlevel clearance for the qualifying projects. Please explain how the EIR will reconcile these two levels of clearance.
- 2. Given the nature of developments, it is difficult to forecast the number, type, intensity, and location of land use developments. How will MTC compile the data on the anticipated developments to be included in the EIR CEQA streamlining?

Ms. A. Nguyen July 12, 2012 Page 3

- 3. If the CEQA streamlining exempts projects from mitigating significant transportation impacts on CMP or local facilities, there will be a conflict with the CMP legislation and requirements. Please explain how the EIR will address this potential conflict.
- 4. Please explain how the EIR will address the potential conflict between Congestion Management Program (CMP) Level-of-Service and other local standards.
- 5. Will the transportation analysis in the EIR utilize the updated 2010 CEQA Transportation checklist? In particular, will it include other measures of transportation system performance beyond Automobile LOS and congestion measures?
- 6. Although SB375 doesn't have CEQA streamlining provisions for employment-based projects, VTA suggests that MTC formulate strategies to address this issue in the RTP and/or in its legislation program to advocate changes to incentivize job growth and support better job and housing concentration in the PDAs.

VTA looks forward to continued dialog and partnership with MTC in the planning and implementation of Plan Bay Area. We suggest that VTA and MTC staff continue the discussions during the development of the DEIR and the Plan Bay Area document. If you have any questions or would like to arrange a meeting, please call me at (408) 321-7093.

Sincerely,

Chris Augenstein, AICP Deputy Director, Planning



ave Mount Diahlo

1901 Olympic Blvd., # 320 Walnut Creek, CA 94596 Tel: (925) 947-3535 Fax: (925) 947-0642 www.SaveMountDiablo.org

#### **Board of Directors**

Malcolm Sproul President

Amara Morrison Secretary

Burt Bassler Treasurer

Arthur Bonwell Emeritus

Heath Bartosh Joe Canciamilla Charla Gabert John Gallagher Claudia Hein Scott Hein David Husted Doug Knauer Brian Kruse Marty Reed *Directors* 

*Staff Directors* Ronald Brown

Executive Director

Seth Adams Land Programs Director

Julie Seelen Advancement Director

Monica E. Oei Finance Director

**Founders** Arthur Bonwell Mary L. Bowerman

#### Proud member of

Land Trust Alliance California Council of Land Trusts Bay Area Open Space Council

Ashley Nguyen, EIR Project Manager Metropolitan Transportation Commission 101 Eighth Street Oakland, CA 94607

Regarding: Environmental Impact Report for Plan Bay Area

Dear Ms. Nguyen,

Save Mount Diablo (SMD) appreciates the opportunity to comment on the scope and content of the environmental information that will be evaluated in the Draft Environmental Impact Report (EIR) for Plan Bay Area. The EIR will analyze the environmental impacts of land use scenarios and transportation investments that will be considered for Plan Bay Area. Metropolitan Transportation Commission (MTC) and Association of Bay Area Governments (ABAG) have asked for comments on such topics as: what environmental issues should be analyzed, what mitigation measures would help avoid or minimize any negative impacts, and how can local jurisdictions and other agencies use this EIR. SMD supports the comments made by East Bay Regional Park District (EBRPD) and by the Contra Costa Transportation Authority (CCTA) on the NOP for the EIR process.

As background, SMD is a non-profit conservation organization founded in 1971 which acquires land for addition to parks on and around Mt. Diablo, and monitors land use planning which might affect protected lands. Our goal is to protect the mountain's natural beauty, integrity, and biological diversity; enhance our area's quality of life; and provide recreational opportunities consistent with protection of natural resources. We build trails, restore habitat, and are involved in environmental education. In 1971 there was just one park on Mt. Diablo totaling 6,788 acres; today there are thirty-eight parks and preserves totaling over 100,000 acres. We include almost 7,000 donors and supporters. SMD works closely with other organizations in the bay area such as EBRPD and CCTA to achieve these goals.

EBRPD has made several proposals in their written comments that will help ensure the draft EIR addresses the mandates of Senate Bill 375 (Steinberg). SB 375, the legislation behind Plan Bay Area, has language requiring transportation, housing and land resource protection issues be looked at simultaneously. SB 375 specifically makes references to financial incentives and financial assistance<sup>1</sup> for resource areas<sup>2</sup> and farmland protection. EBRPD's proposals address negative impacts and environmental issues regarding natural resource areas. EBRPD's proposals include:

- Mitigate significant adverse impacts of land use and transportation proposals on parks, recreation, open space, and greenfields,
- Establish financial incentives and financial assistance for protecting natural resource areas, as stated in SB 375,
- Acknowledge the value of existing natural resource areas and open space conservation in mitigating adverse impacts from transportation and land use development, and
- Address any conflicts with adopted City, County and Regional Open Space Plans and Elements through mitigation measures.

CCTA provided comments regarding the Urban Limit Line in Contra Costa County and other counties. Contra Costa County is in the forefront of counties that have established an Urban Limit Line program. Measure J, approved by voters in 2004, requires that the County and all Contra Costa cities have in place voter-approved Urban Limit Lines.

As the Plan Bay Area strategy is developed, we must not diminish or lose sight of the value of our resource areas and farmlands. As stated on the OneBayArea website sponsored by MTC, ABAG and other agencies, "Plan Bay Area is the next step in a natural progression of decades of regional planning. As our population is expected to grow from about 7 million in 2011 to approximately 9 million in 2040, we need to start making transportation, housing and land use decisions now to sustain the Bay Area's high quality of life for current and future generations." Part of the Bay Area's high quality of life is the natural resources we currently enjoy. We must work to protect these for future generations.

<sup>&</sup>lt;sup>1</sup> Government Code Section 65080(b)(4)(c) states, "The metropolitan planning organization or county transportation agency, whichever entity is appropriate, shall consider financial incentives for cities and counties that have resource areas or farmland ...The metropolitan planning organization or county transportation agency, whichever entity is appropriate, shall also consider financial assistance for counties to address countywide service responsibilities in counties that contribute towards the greenhouse gas emission reduction targets by implementing policies for growth to occur within their cities."

<sup>&</sup>lt;sup>2</sup> Government Code Section 65080.01 states, (a) "Resource areas" include (1) all publicly owned parks and open space; (2) open space or habitat areas protected by natural community conservation plans, habitat conservation plans, and other adopted natural resource protection plans; (3) habitat for species identified as candidate, fully protected, sensitive, or species of special status by local, state, or federal agencies or protected by the federal Endangered Species Act of 1973, the California Endangered Species Act, or the Native Plan Protection Act; (4) lands subject to conservation or agricultural easements for conservation or agricultural purposes by local governments, special districts, or nonprofit 501(c)(3) organizations, areas of the state designated by the State Mining and Geology Board as areas of statewide or regional significance pursuant to Section 2790 of the Public Resources Code, and lands under Williamson Act contracts; (5) areas designated for open-space or agricultural uses in adopted open-space elements or agricultural elements of the local general plan or by local ordinance; (6) areas containing biological resources as described in Appendix G of the CEQA Guidelines that may be significantly affected by the sustainable communities strategy or the alternative planning strategy; and (7) an area subject to flooding where a development project would not, at the time of development in the judgment of the agency, meet the requirements of the National Flood Insurance Program or where the area is subject to more protective provisions of state law or local ordinance.

Once again, SMD supports CCTA's comments, included in their July 5, 2012 letter to MTC, in general. Additionally, SMD supports EBRPD's proposals and SMD requests that these proposals be included in the Draft EIR. We agree with MTC and ABAG staff that one outcome for the Plan Bay Area is to "ensure stewardship of the spectacular scenic and natural resources of our region."<sup>3</sup> Thank you for the opportunity to provide comments on this very important effort for the bay area.

Sincerely,

Seth Adams Land Programs Director

cc: Ron Brown

<sup>&</sup>lt;sup>3</sup> In a May 11, 2012 presentation providing MTC and ABAG staff's joint recommendation for the preferred land use scenario and transportation investment strategy for the Plan it offers several reasons for Plan Bay Area. One outcome was to "ensure stewardship of the spectacular scenic and natural resources of our region."

#### Re: Notice of Preparation of a Draft EIR for Plan Bay Area

From: eircomments

To: Joanna.Au@flysfo.com

- CC: John.Bergener@flysfo.com; John.Kim@flysfo.com; Julian.Potter@flysfo.com;
- Nixon.Lam@flysfo.com; Tryg.McCoy@flysfo.com; Melba.Yee@sfgov.org; rnapier@smcgov.org

BC:

Date: Tuesday - July 10, 2012 10:28 AM

Subject: Re: Notice of Preparation of a Draft EIR for Plan Bay Area

Thank you for your comments; they will be considered carefully during the preparation of the Plan Bay Area Environmental Impact Report (EIR). To stay updated on Plan Bay Area and the environmental process, please visit www.onebayarea.org.

The Metropolitan Transportation Commission 101 8th Street Oakland, CA 94607 (510) 817-5700

>>> Joanna Au 07/09/12 9:45 AM >>>

Attached please find the electronic version of a comment letter sent to Ashley Nguyen, EIR Project Manager, at MTC regarding the subject matter.

Thank you. Joanna Au Planning & Environmental Affairs San Francisco International Airport P. O. Box 8097 San Francisco, CA 94128 Tel: 650-821-6678 Fax: 650-821-5383 Email: Joanna.Au@flysfo.com

SFO

San Francisco International Airport

July 3, 2012

Ashley Nguyen EIR Project Manager Metropolitan Transportation Commission Joseph P. Bort Metro Center 101 Eighth Street Oakland, CA 94607

#### Subject: Notice of Preparation of a Draft Environmental Impact Report for Plan Bay Area

Dear Ms. Nguyen:

San Francisco International Airport (SFO or the Airport) has received a Notice of Preparation of a Draft Environmental Impact Report for Plan Bay Area (the Plan), the region's Sustainable Communities Strategy under SB 375, and has reviewed the current Preferred Land Use and Transportation Investment Strategy. We appreciate this opportunity to coordinate with MTC and ABAG staff in considering the impact that the regional planning effort may have on land use compatibility issues relating to airport noise and safety overlay requirements.

In previous correspondence with ABAG, SFO stated concerns related to future development patterns envisioned by Plan Bay Area and airport land use compatibility. These concerns deal with potential land use incompatibilities that could arise if the communities in SFO environs were to develop without due consideration of the Airport's operational criteria, including noise and airspace protection. The following section frames the land use compatibility issues faced by SFO and other Bay Area airports. In the last section, SFO offers comments on scoping for the Plan Bay Area Draft EIR document.

#### Background

According to population and employment forecasts, the Bay Area is projected to have an additional 1.1 million jobs and 660,000 housing units by 2040. Plan Bay Area sets forth a vision for future land use and transportation investments through 2040, and will serve as the region's Sustainable Communities Strategy under state Senate Bill 375 (Steinberg). In a regional land use plan with such a long term time frame and as comprehensive as Plan Bay Area, it is essential to consider land use compatibility with other regional priorities such as airport operations as the region decides where and how to grow.

SFO is situated on bay fill and surrounded by water on three sides, and U.S. Highway 101 on the west. Lands immediately adjacent to the Airport have largely been developed with residential and industrial uses. Within the environs of SFO are major transportation nodes and corridors, including U.S. 101, El Camino Real, and the BART and Caltrain stations and rail lines. The cities of South San Francisco, San Bruno, and Millbrae have adopted plans or are working towards intensifying development along the El Camino Real corridor, supported by the multi-jurisdiction Grand Boulevard Initiative. According to the current Plan Bay Area strategy, an additional 58,250 housing units could be added along the length of the Grand Boulevard through 2040. In addition, BART and Caltrain station hubs within these areas are candidates for higher density transit-oriented developments that often involve taller buildings and mixed uses.

#### AIRPORT COMMISSION CITY AND COUNTY OF SAN FRANCISCO

EDWIN M. LEE MAYOR	LARRY MAZZOLA PRESIDENT	LINDA S. CRAYTON VICE PRESIDENT	ELEANOR JOHNS	RICHARD J. GUGGENHIME	PETER A. STERN	JOHN L. MARTIN AIRPORT DIRECTOR

Ashley Nguyen July 3, 2012 Page 2 of 3

Concurrently, the California Aeronautics Act charges the California Department of Transportation, Division of Aeronautics, with adopting noise standards governing the operation of aircraft for airports based on the level of noise acceptable to a reasonable person residing in the vicinity of the airport. (Public Utilities Code Section 21669). The California Airport Noise Regulations promulgated by the Division of Aeronautics states that "[t]he level of noise acceptable to a reasonable person residing in the vicinity of an airport is established as a community noise equivalent level (CNEL) value of 65 dB for purposes of these regulations. This criterion level has been chosen for reasonable persons residing in urban residential areas where houses are of typical California construction and may have windows partially open. It has been selected with reference to speech, sleep and community reaction." (Title 21 California Code of Regulations 5006). Residential uses located in areas above the 65 dB CNEL are incompatible land uses.

The California State Legislature has long recognized the need for land use decisions to take into consideration the operations of an airport and prevent inappropriate land uses that threaten or limit the operations of an airport. In 1967, the Legislature authorized the creation of Airport Land Use Commissions (ALUC) to protect the "public health, safety, and welfare by encouraging orderly expansion of airports and the adoption of land use measures that minimizes exposure to excessive noise and safety hazards within areas around public airports to the extent that these areas are not already devoted to incompatible land uses." (Public Resources Code Section 21670).

The policies of the Airport Land Use Compatibility Plan for SFO (ALUCP) guide compatible development in the lands surrounding SFO with respect to noise, safety, and airspace protection issues associated with aircraft operations. The current draft of the updated ALUCP recognizes the development pressures faced by the Airport's neighboring jurisdictions, which must accommodate new housing according to their regional allocations as derived through ABAG's Regional Housing Needs Assessment (RHNA). Furthermore, commercial and industrial development will likely increase as the global and regional economy recovers and regional employment grows. While the Jobs-Housing Connection Strategy supports such growth within Priority Development Areas, including El Camino Real/The Grand Boulevard, the approach must be balanced against compatibility with airport operations and the state's charge to Airport Land Use Commissions to protect airport environs from increasing land use incompatibilities. For instance, the issue of noise compatibility may limit the types of uses suitable for certain properties; or airspace protection policies may require height restrictions on certain properties under critical aircraft arrival and departure paths.

The South El Camino Real area in South San Francisco illustrates an example of proposed mixed-use development along a transportation corridor intersecting with airport land use compatibility considerations. Several parcels in this area have recently been re-designated for mixed land uses. The portion of the South El Camino Real area within the Airport's CNEL 70 dB contour encompasses approximately 30 acres. With potential residential densities of up to 60 dwelling units per acre, this represents a significant portion of South San Francisco's planned housing in a high noise area. According to build-out projections in South San Francisco's general plan, the South El Camino Real area could see an additional 840 housing units; if constructed, approximately 340 of these units could be unduly impacted by aircraft noise.

#### Plan Bay Area EIR Scoping

As Plan Bay Area envisions a more focused growth pattern in existing urbanized areas, consistency with existing land use policies will need to be considered. The primary policy document guiding land use compatibility within SFO environs is the Airport Land Use Compatibility Plan (ALUCP) for SFO, which

Ashley Nguyen July 3, 2012 Page 3 of 3

is scheduled to be adopted in updated form in early fall of 2012. The EIR's analysis of potential land use impacts should, therefore, discuss potential conflicts with the locally adopted ALUCP for SFO, as well as other ALUCPs applicable to public use airports within the nine-county Bay Area region.

The SFO ALUCP specifically deals with noise/land use within the Airport environment through its noise compatibility policies. These policies do not support the development of new residential uses within the CNEL 70 dB contour, and only conditionally within the CNEL 65 dB contour. As mentioned above, an adjustment to RHNA numbers could possibly reduce the possible development of incompatible residential uses within airport environs. For communities in proximity to airports, MTC and ABAG can support the development of sustainable communities with compatible land uses by adjusting local application of the RHNA and reducing the housing requirements in these jurisdictions to account for land areas that are incompatible for housing development.

SB 375 further provides CEQA streamlining provisions for "residential/mixed use residential projects" and "transit priority projects" meeting certain criteria. Since qualified projects may potentially be located within ALUCP policy areas, it must be clear that development proposals that are not fully consistent with current ALUCP policies should not be eligible for CEQA streamlining benefits provided under SB 375.

The Airport appreciates your consideration of these comments. If the Airport can be of assistance as ABAG and MTC considers airport land use compatibility in its regional planning efforts, please do not hesitate to contact John Bergener at (650) 821-7867 or at john.bergener@flysfo.com.

Very truly yours,

John L. Martin Airport Director San Francisco International Airport

 cc: Julian Potter, SFO COS Tryg McCoy, SFO COO John Bergener, SFO BPEA, Airport Planning Manager Nixon Lam, SFO BPEA, Manager of Environmental Affairs Richard Napier, San Mateo County C/CAG and San Mateo County Airport Land Use Committee 

 From:
 "Barbara Kelsey" <loma.prieta.chapter@sierraclub.org>

 To:
 <eircomments@mtc.ca.gov>

 CC:
 "Jay Halcomb" <halcomb@sonic.net>, "'Arthur Feinstein'' <arthurfeinstein@earthlink.net>, "'Ginny Laibl'''<ginnylaibl@yaho.com>

 Date:
 7/11/2012 2:42 PM

 Subject:
 Sierra Club chapter chairs

Hello Ms. Nguyen,

Here are the three local Sierra Club Chapter Chairs' contact emails for your files.

My apologies for not including that info with our comment letter.

Jay Halcomb

Redwood Chapter Chair

halcomb@sonic.net

Arthur Feinstein

San Francisco Bay Chapter Chair

arthurfeinstein@earthlink.net

Ginny Laibl

Loma Prieta Chapter Chair

ginnylaibl@yahoo.com

#### Best,

Barbara Kelsey Chapter Coordinator Sierra Club, Loma Prieta Chapter 3921 E. Bayshore Rd, Suite 204 Palo Alto, CA 94303 ph 650-390-8411

From:	eircomments
To:	loma.prieta.chapter@sierraclub.org
CC:	patpiras@sonic.net
Date:	7/11/2012 5:22 PM
Subject:	Re: Comments regarding Scoping of the Draft Environmental Impact Report (DEIR) for Plan Bay
Area (PBA)	

Thank you for your comments; they will be considered carefully during the preparation of the Plan Bay Area Environmental Impact Report (EIR). To stay updated on Plan Bay Area and the environmental process, please visit <u>www.onebayarea.org</u>.

Ashley Nguyen, EIR Project Manager Metropolitan Transportation Commission 101 8th Street Oakland, CA 94607 (510) 817-5809

>>> "Barbara Kelsey" <<u>loma.prieta.chapter@sierraclub.org</u>> 7/11/2012 2:11 PM >>> Dear Ms. Nguyen:

The three Chapters of the Sierra Club within the MTC/ABAG region are submitting this joint letter regarding the Notice of Preparation (NOP) for the Draft Environmental Impact Report (DEIR) for "Plan Bay Area (PBA)." Thank you for the opportunity to comment on this draft.

Best regards,

Barbara Kelsey

**Chapter Coordinator** 

Sierra Club, Loma Prieta Chapter

3921 E. Bayshore Rd, Suite 204

Palo Alto, CA 94303

ph 650-390-8411

fax 650-390-8497



July 11, 2012

Ms. Ashley Nguyen, Project Manager Email: <u>eircomments@mtc.ca.gov</u> Fax: <u>510.817.5848</u> Metropolitan Transportation Commission (MTC) 101 Eighth Street Oakland, CA 94607

#### RE: Comments regarding Scoping of the Draft Environmental Impact Report (DEIR) for Plan Bay Area (PBA)

Dear Ms. Nguyen:

The three Chapters of the Sierra Club within the MTC/ABAG region are submitting this joint letter regarding the Notice of Preparation (NOP) for the Draft Environmental Impact Report (DEIR) for "Plan Bay Area (PBA)."

The Sierra Club understands that PBA is intended to satisfy the requirements for a Regional Transportation Plan and Sustainable Communities Strategy under SB 375, as amended. Given that this is the Region's first program under this landmark State legislation, we commend the staffs of both ABAG and MTC for their cooperative and professional efforts to involve thoughtful members of the public in reducing Greenhouse Gases (GHGs) and their harmful effects on our environment.

A primary goal of Sierra Club members is good viable public transit that serves more people reliably and with good coverage. National Club policy emphasizes the dangerous and undesirable effects of Climate Change. All of the comments below are consistent with adopted National and local Sierra Club policies.

We recognize that development of "inputs" into the transportation model requires continuing refinement, and that the upcoming analysis is complicated by the use of the new analytical tool known as UrbanSim. We are deeply concerned, however, about the discrepancies between the information contained in the "official" DEIR Notice of Preparation, and additional materials that have recently been provided to the Policy Advisory Council and, particularly, to the MTC Planning Committee and the ABAG Administrative Committee for their joint meeting on Friday July 13<sup>th</sup>. The memo which these latter bodies will be considering, and which is posted at:

http://apps.mtc.ca.gov/meeting\_packet\_documents/agenda\_1908/EIR\_Alternativ es.pdf provides significant changes, both in terminology and substance, from what has been provided to the public under the official NOP – so, which are supposed to be the subject of comment? As examples, "re-naming" the NOP Alternative 3 from "Lower Concentrations of PDA Growth" to "Transit Priority Focus", and Alternative 4 from "Eliminate Inter-Regional Commuting" to "Enhanced Network of Communities" are more than cosmetic. And when combined with the new "Intent" and "Policy Measures" descriptions in the "Friday the 13<sup>th</sup>" memo, the potential results are quite disconcerting. In particular, the newly revealed emphasis in Alternative 4 about "reducing local regulatory constraints" requires much more disclosure as to what resulting possible environmental impacts might be, and we specifically request full identification of such proposals as part of the DEIR.

• We hereby request an extension of time in order to fully comment on the new aspects brought into consideration by the "Friday the 13<sup>th</sup>" memo mentioned above and the new Federal transportation legislation signed on July 6.

In order to preserve our future rights, we offer comments that reference both the NOP document and the "Friday the 13<sup>th</sup>" memo. We also look forward to an opportunity for the public to become informed, and to be able to comment, about any changes that may become relevant as a result of the newly-signed Moving Ahead for progress in the 21<sup>st</sup> Century Act" (MAP-21) and the "Federal Public Transportation Act of 2012," in particular new "environmental streamlining" provisions.

We request clarification of how state provisions for "streamlining" under SB 375 and its amendments are intended to be implemented. For example, if "full" CEQA exemptions are allowed for developments that might be determined to be "eligible" as "Transit Priority Projects", what kind of recourse is there if the underlying "transit" project ends up not being implemented as contemplated, or if the development is seriously environmentally flawed, despite its location?

Further, there needs to be better clarity regarding potential "Policy Tools" as mentioned in the NOP, especially "fees" "subsidies", and "pricing." More specificity as to precisely what these measure might be is required. How will MTC/ABAG ensure that such "tools," and how they are applied by other jurisdictions, comply with environmental protection and environmental justice as outcomes, and do not encourage undesirable development (including sprawl) or environmental degradation (including further GHGs)?

We understand that MTC's "Transit Sustainability Project" (TSP) is intended to form a substantial basis for determining future investments in some elements of the regional public transportation system. However, while many regional documents reference the "three-legged stool" of Sustainability (Environment,

Equity, and Economy), the final project report for the TSP stands wobbly on just a single leg of financial incentives & penalties.

Additional questions we have that should be addressed in the DEIR analysis and document include:

- How are freight impacts being modeled for each alternative? What assumptions are made for each alternative regarding changes and levels for freight traffic (including separate analysis for rail/truck modes), and what resulting regional impacts are calculated for costs of goods transported?
- How will efficiency and cost-effectiveness of capital projects (all modes) be evaluated? New transit should not add to the cost per passenger of existing systems. New road projects should not increase any levels of GHGs.
- How will Transit State of Good Repair be evaluated and included at sustainable funding levels for all alternatives? This cannot wait until the 2017 RTP.

We specifically request that each alternative beyond the "No Project" should include full regional funding for availability of a free bus pass for all middle- and high school students, regardless of family income or school type. This not only can teach transit-user skills for new generations, but MTC's own documents identify auto traffic in the vicinity of schools as one of the largest contributors to congestion and GHS.

In addition, references to "upzoning" are used as a term of art in several places in the "Friday the 13<sup>th</sup>" memo, but no definition or explanation is provided as to what is intended. In some places the term seems to be used to imply increased densities, and in others to improved quality of housing stock. The online "McGraw-Hill Dictionary of Architecture & Construction" defines the term to mean

"A change in the zoning classification of a property from one of lower use to one that is of higher use; for example, a change from residential to commercial use."

However, in the description of the EJJ alternative for the Friday the 13<sup>th</sup> memo, reference is made to a "modified RHNA" to encourage upzoning that would add to affordable housing. We specifically request that a clear definition and intended outcome of the term "upzoning" be provided to the public before the DEIR analysis begins.

For your convenience, we have organized additional comments and requests into the attached chart\*, which addresses the "key impact categories" proposed for the DEIR, as well as several that were originally proposed to not be addressed. If we have inadvertently mis-classified any of these comments, our intent and request is that they be considered under the "category" most relevant to your analysis. We request specific substantive responses to all questions and comments posed herein. If you have any questions regarding these comments, and as a central point of contact to receive your responses, please contact Patrisha Piras of the San Francisco Bay Chapter at patpiras@sonic.net or via phone at 510-278-1631.

The Sierra Club thanks you for your attention to these important regional and environmental matters.

Sincerely,

Aug R. Halumb

Jay Halcomb Redwood Chapter Chair

Alla Free

Arthur Feinstein San Francisco Bay Chapter Chair

Simmy hard

Ginny Laibl Loma Prieta Chapter Chair

#### \* Additional Sierra Club Comments, by "Key Impact Category" for DEIR Scoping for Plan Bay Area

1. Transportation	* Overall, transportation investments need to reduce
	GHGs on their own merits, rather than relying on
	land use changes for SB375 compliance.
	* There needs to be at least one alternative, other
	than the No Project, that does not add any lane-
	miles to the highway system especially for "Express
	Lane" purposes.
	* Full environmental and financial justification must
	be provided for the "Express Lane Network" – by
	route component (e.g., highway segment).
	* Costs of parking need to calculated and be fully
	charged to users, especially at transit facilities.
	* How are passenger amenities such as "next
	vehicle" info, Wi-Fi, etc included in improving transit
	ridership?
	* All alternatives need to include well-funded
2. Air Quality	improvements in Active Transportation.  * How will healthful improvements such as street
2. All Quality	* How will healthful improvements such as street trees be incorporated into PDA design and
	construction?
3. Land Use, Housing,	* Complete Streets requirements and enforcement
Agriculture, & Physical	should be included and strengthened in all
Displacement	alternatives.
	* Anti-displacement housing and small business
	policies should be an integral part of PDA policies
	and approvals.
4. Energy	* How is funding guaranteed for charging facilities
	for electric vehicles, if these are being encouraged?
5. Greenhouse Gases &	* Each alternative beyond the "No Project" should
Climate Change	include implementation policies and full regional
	funding to provide a free bus bass for every middle-
	and high-school student in the region.
	* Non-travel (e.g., telecommute) and Active
	Transportation improvements should be increased in
6 Noice	each alternative.  * Highway soundwalls need to be equitably available.
6. Noise	* Highway soundwalls need to be equitably available in all communities.
	* In PDAs, noise absorbing pavement should be
	considered.
	* Rail electrification should be pursued (passenger
	and freight) without impinging on funding for other
	transit systems.
7. Geology & Seismicity	* How are PDAs being located to avoid intrusion into

	more seismically-dangerous areas?
8. Water Resources	* PDA design needs to foster features including
	bioswales, rain gardens, porous streets.
	* Water recycling should continue to be encouraged,
	especially in PDAs, and to accommodate any
	population growth.
9. Biological Resources	* Need to ensure protection and preservation of
	open space and wildlife habitats. This includes
	wetlands areas and connectivity of wildlife corridors.
	* PDAs in proximity to wildlife corridors should be
	sited and built to wildlife-friendly guidelines.
10. Visual Resources	No comments at this time
11. Cultural Resources	No comments at this time
12. Public Utilities	* Improve Internet availability and reliability to
	encourage telecommuting.
	* Funding for utilities improvements (e.g., sewers)
	should not be taken from transit-eligible uses.
13. Growth-Inducing	* Population should be equitably distributed.
Impacts	Integrate affordable housing throughout communities
	including PDAs.
ADDITIONAL	
CATEGORIES TO BE	
ADDED &	
CONSIDERED:	
14. Public Services	* We agree with other commenters that all new
	design and construction needs to improve fire
·	suppression and control.
15. Recreation	* There needs to be improved transit access to
	recreation areas and facilities, especially from PDAs
	and TPP areas.
16. Safety	* Should be recognized as a consideration in project
	design & funding approvals.



...working for you!

SOLANO TRANSPORTATION AUTHORITY

Member Agencies: Benicia • Dixon • Fairfield • Rio Vista • Suisun City • Vacaville • Vallejo • Solano County

One Harbor Center, Suite 130, Suisun City, CA 94585-2473 • Telephone (707) 424-6075 / Facsimile (707) 424-6074 Email: staplan@sta-snci.com • Website: sta.ca.gov

July 11, 2012

Ashley Nguyen, EIR Project Manager Metropolitan Transportation Commission 101 Eighth Street Oakland, CA 94607

#### RE: Draft Environmental Impact Report (DEIR) for Plan Bay Area

Dear Ms. Nguyen:

The Solano Transportation Authority (STA) is the Congestion Management Agency (CMA) for Solano County. STA offers the following comments in response to the Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) for Plan Bay Area, issued by the Metropolitan Transportation Commission (MTC).

- STA concurs with the NOP's assessment of issues that may potentially be impacted by the Plan Bay Area. Similarly, STA agrees with MTC's conclusion that there will not be impacts to the categories of Hazardous Materials, Recreation and Mineral Resources, and that no further analysis is required. Because the Plan intentionally attempts to direct land use development, including uses that either generate or consume local tax revenues, it would be appropriate to consider impacts to public finances and the Public Service that are funded by those local tax revenues as a part of the DEIR.
- 2. STA generally concurs with the alternatives that are proposed for analysis in the Plan Bay Area DEIR: No Project, Jobs-Housing Connection (the Project), Lower Concentration of PDA Growth, Eliminate Inter-Regional Commute and Environment, Equity and Jobs. The Project and the 4 Alternatives will provide broad range of alternatives and data to allow MTC and the Association of Bay Area Governments (ABAG) to make informed choices when approving the final Plan Bay Area document. As noted below, however, there are two additional alternatives that should be considered in preparation of the DEIR.
- 3. Alternative 1, No Project, should be modified so that it is implementation of the existing Regional Transportation Plan (RTP), known as Transportation 2035 (T2035). The No Project alternative as currently proposed assumes delivery of only projects that have either received full funding or environmental clearance as of May 1, 2011. It is reasonable and prudent to assume additional funds will come in to the region beyond those committed to projects that meet the May 1, 2011 funding cut-off, and that those funds will be adequate to complete the fiscally-constrained project list contained in T2035. It is also reasonable and prudent to assume that those projects will be able to obtain all necessary permits, including environmental clearance. The No Project alternative should therefore assume build-out of the fiscally constrained transportation network envisioned in the T2035 project list. Since T2035 was approved before SB 375, the EIR adopted for T2035 does not appear to provide an analysis of the plan's impacts that meets current standards, so the Plan Bay Area EIR will need to provide an updated analysis of implementation of T2035.
- 4. Alternative 4, Eliminate Inter-Regional Commute, appears to assume a much higher residential growth rate than does the Project. The land use scenario for this Alternative assumes higher growth rates near employment centers at the edge of the region. This should include job centers in Solano County communities. STA is concerned that the limits to High Occupancy Vehicle (HOV) and Express lanes in the Alternative 4 transportation investment package will significantly impact projected congestion in Solano County and other suburban portions of the Bay Area. STA therefore recommends that this alternative include build-out of the HOV / Express Lane network in the transportation investment package.

5. At a DEIR Scoping Meeting held in Solano County on June 25, 2012, several comments were made by members of the public that should receive consideration in preparation of the Plan Bay Area DEIR.

Those comments are:

- The DEIR should include an Alternative with a lower rate of employment and residential growth, based on an assumption that the Bay Area and regional economy do not see a significant economic recovery.
- The DEIR should address, either as part of one of the Alternatives or in a separate segment, what would be the impacts to the transportation system if projected sea level rise does not occur. For example, would this free up funds no longer needed for sea level rise mitigation that could allow additional projects or programs to be implemented?
- 6. Since the NOP asks the question "Are we applying the appropriate policy levers to better encourage sustainable development," the DEIR should include a definition of "sustainable development" that can be used to perform this measure.
- 7. A land use strategy that should be considered in the DEIR is the implementation of existing local general plans. In light of the difficulty of using regional transportation funds to incentivize local land use decisions, the DEIR should consider implementation of current local general plans as a likely and feasible alternative.

Thank you for the opportunity to comment on the Plan Bay Area DEIR NOP. STA looks forward to working with MTC as the DEIR is developed and issued for public comment.

Sincerely,

Jack Batchelor, Chair Solano Transportation Authority

Cc: STA Board Members Steve Heminger, MTC Executive Director Amy Worth, MTC Chair Jim Spering, MTC Commission From:Ashley NguyenTo:Brenda Dix; Stefanie HomDate:7/11/2012 2:55 PMSubject:Fwd: NOP EIR Plan Bay AreaAttachments:NOPPlanBayArea.pdf

Ashley Nguyen Senior Transportation Planner/Analyst Metropolitan Transportation Commission 101 Eighth Street | Oakland, CA 94607 Tel. 510.817.5809 | Fax 510.817.5848

>>> "Dan Bell" <DBell@ci.corte-madera.ca.us> 7/11/2012 2:34 PM >>>

Ms. Nguyen:

Attached are comments on the Notice of Preparation for the Draft EIR for Plan Bay Area from the Town Council of the Town of Corte Madera due to MTC on this date. A hard copy of the Town Council letter will follow by regular mail.

Dan Bell, Planning Director Town of Corte Madera 300 Tamalpais Drive Corte Madera, Ca. 94925 (415) 927-5059 www.ci.corte-madera.ca.us



THE TOWN OF CORTE MADERA MARIN COUNTY CALIFORNIA

300 Tamalpais Drive Corte Madera, CA 94925-1418

#### www.ci.corte-madera.ca.us

Town Manager Town Council 415-927-5050

Town Clerk 415-927-5086

Finance / Bus. License 415-927-5055

Fire Department 415-927-5077

Planning / Zoning 415-927-5064

Building Inspector 415-927-5062

Town Engineer Public Works 415-927-5057

Recreation Department 415-927-5072

Sanitary District No. 2 415-927-5057

Twin Cities Police Authority 415-927-5150

Metropolitan Transportation Commission Joseph P. Bort Metro Center 101 Eighth Street Oakland, Ca. 94607-4700 Attn: Ashley Nguyen, EIR Project Manager

### Subject: Notice of Preparation of an Environmental Impact Report for Plan Bay Area, which comprises the Bay Area Regional Transportation Plan (RTP) and the Sustainable Communities Strategy (SCS).

Dear Ms. Nguyen:

Thank you for the opportunity to comment on the Notice of Preparation (NOP) for preparation of a program-level Draft Environmental Impact Report (EIR) for the Plan Bay Area project. Providing substantive comments on the specifics of a program-level NOP for an EIR of this scale that also includes four separate Project Alternatives with varying assumptions for land-use and transportation improvements can be quite a daunting exercise in this limited time frame. The Corte Madera Town Council comments on the NOP will, therefore, focus on more general observations and questions. Below is a list of our comments on the NOP:

1. The Project assumes regional population growth of 2.147 million by the year 2040. One of our Councilmembers has reported that the California Department of Finance has recently reduced its demographic forecast for 2040 by approximately 1 million people. Is this information correct and, if so, will the assumptions in the SCS and Draft EIR be adjusted accordingly?

2. Local control must be retained when determining the applicability and scope of CEQA review for future residential projects. We are concerned that there is an implication that certain CEQA exemptions and/or streamlining are <u>automatic</u> per SB 375. To clarify this matter, we offer this statement:

The Town Council of the Town of Corte Madera is opposed to any automatic CEQA exemptions or streamlining for future residential development projects as defined in Senate Bill 375. We recommend that the **Plan Bay Area** document and the Environmental Impact Report for the **Plan Bay Area** document clearly and unambiguously state that local jurisdictions shall retain the authority to determine the scope of CEQA review for all subsequent residential development projects, notwithstanding those provisions in SB 375.

3. The justification is unclear why the Draft EIR will not address four potential impact categories (Hazardous Materials, Public Services, Recreation & Mineral Resources) when all other standard categories are intended to be addressed.

4. In light of item 3. above, it is unclear why MTC's PowerPoint description of Alternative 5 (Environment, Equity and Jobs) stated there will be a Land Use evaluation of "Additional affordable housing in locations with high-performing schools and local services". How can this evaluation take place if (Public Services) is one of the categories that will not be addressed?

5. The evaluation of <u>Visual Resources</u> should include potential impacts on existing community character. Corte Madera prides itself on its small town character which is manifested in its preference for lower scale development that is contextual with the community.

6. We request the Transportation evaluation include Level of Service (LOS) for local traffic.

7. We emphasize the importance of evaluating the potential conflict with locally adopted General Plans as called for under Land Use, Housing Agriculture and Physical Displacement.

8. <u>Land Use, Housing Agriculture and Physical Displacement</u> should also address how other housing types may be "crowded out" by typical multi-family development anticipated by the Project. Examples of other housing types may include Assisted Living Units, Homeless Shelters, Women's Shelters, Live/Work Lofts, Section 8 Units, Small Starter Condominiums, Small Starter Single Family Homes/Bungalows.

9. Page 8 of the NOP states that "the proposed Project and alternatives evaluated in the EIR must be financially constrained to the \$277 billion envelope." Although, Alternatives 1, 4 and 5 do <u>not</u> include analysis using the Preferred Transportation Investment Strategy, which is financially constrained to \$277 billion. Please explain.

10. Please make it clear that the Project and all Alternatives (except Alternative 4) will be analyzed using the same growth forecasts, i.e. 2,147,000 new people, 1,120,000 new jobs, 660,000 new housing units. Please provide the demographic and economic forecasts in the Draft EIR that will be analyzed in Alternative 4.

If you should have any questions, please contact Planning Director Dan Bell at (415) 927-5059

Sincerely,

Kabit P Ravano

Bob Ravasio, Mayor Town of Corte Madera

cc: Mark Luce, ABAG President 101 Eighth Street Oakland, Ca. 94607-4700 Supervisor Susan Adams 3501 Civic Center Dr. #329 San Rafael, Ca. 94903 Councilwomen Pat Eklund City of Novato 75 Rowland Way #200 Novato, Ca. 94945 Diane Steinhauser, Executive Director TAM 750 Lindaro St. #200 San Rafael, Ca 94901

From:	eircomments		
То:	Jim Moore		
CC:	CouncilMember David Weinsoff; Uackson@tam.ca.gov; Lawrence Bragman; Pam		
Hartwell-Herrero;	Ryan O'Neil; john reed		
Date:	7/10/2012 5:37 PM		
Subject:	Re: Plan Bay Area EIR NOP Comment Letter		

Thank you for your comments; they will be considered carefully during the preparation of the Plan Bay Area Environmental Impact Report (EIR). To stay updated on Plan Bay Area and the environmental process, please visit www.onebayarea.org.

Ashley Nguyen, EIR Project Manager Metropolitan Transportation Commission 101 8th Street Oakland, CA 94607 (510) 817-5809

>>> Jim Moore <<u>jmoore@townoffairfax.org</u>> 7/10/2012 4:43 PM >>> Dear Ashley,

Please find attached our comment letter on the scope and content of the environmental information that will be evaluated in the EIR.

Best Regards,

Jim Moore

James M. Moore Director of Planning & Building Services Town of Fairfax 142 Bolinas Road Fairfax, CA 94930 Phone: (415) 453-1584 Fax: (415) 453-1618

"The Life of the Land is Perpetuated in Righteousness" (Ua mau ke ea o ka aina i ka pono has been the motto of Hawaii for over 160 years)



## TOWN OF FAIRFAX

142 BOLINAS ROAD, FAIRFAX, CALIFORNIA 94930 (415) 453-1584/FAX (415) 453-1618

July 11, 2012

Ashley Nguyen, EIR Project Manager Metropolitan Transportation Commission & Association of Bay Area Governments Joseph P. Bort MetroCenter 101 Eight Street Oakland, CA 94607-4700

## Subject: Notice of Preparation (NOP) of a Draft Environmental Impact Report (EIR) for Plan Bay Area

Dear Ms. Nguyen,

Thank you for the opportunity to comment on the Notice of Preparation (NOP) for the Draft Environmental Impact Report for "Plan Bay Area"; an integrated Regional Transportation Plan (RTP) and Sustainable Communities Strategy (SCS) called for in Senate Bill (SB) 375 that went into effect in 2009.

As you might imagine, staying abreast of and participating in regional planning activities is always a daunting task for small municipalities with limited staff like the Town of Fairfax. And though the long term impacts to Fairfax from the current SCS preferred scenario appear minimal as Fairfax does not qualify as having either a "Priority Development Area" (PDA) nor a "Transit Priority Project" (TPP, as described in SB 375) we do, however, have the following insights, comments and/or suggestions to share.

First, the drafting of the SCS "preferred scenario" (for jobs and housing growth between now and approximately thirty years out to 2040) has been developed over the last year and a half. During that time, Fairfax's allotted share of household growth has gone from a low of 40 new households to the current 240 households. Coincidently, this significant increase in our allotment occurred shortly after two major municipalities along the major transportation corridors within our county complained about the total number of household units being modeled in their localities. After their complaints, their allocations were reduced. The point or question being: if the overall intent of SB 374 and the SCS process is to link transportation corridor (neither a PDA or TPP), then why and/or how could the numbers have grown so dramatically?

Next, staff would like to point out that the Town of Fairfax is not situated along a primary or even a secondary transportation route (as defined in SB 375 for TPP's). The Town is at the outer edges of the built environment at the upper end of the physically constrained Ross Valley, and is solely dependent upon the Sir Francis Drake Boulevard corridor: a corridor that is currently operating at extremely low and failing levels of service.

Likewise, virtually the entirely Ross Valley is within the Wildlife-Urban Interface (WUI) high fire danger zone as well as is in a critical flood area: so both evacuations and emergency response times are already a serious challenge that should be addressed.

Therefore, staff offers the following comments on the NOP:

- 1. <u>Potential Environmental Issue Public Services</u>: Since the jobs and housing growth will have a significant impact on local-level and countywide public services and facilities the Program Level EIR should address "public services" particularly emergency services and evacuation protocol.
- 2. <u>Alternative 1 "No Project"</u>: since the "no project" alternative is actually a modeling of the same projected growth without a "SCS project" and since the Town of Fairfax is virtually a built-out community that intends to maintain its current historic scale and character, then a "no project" alternative that in fact models limited future development to either (a) the few remaining developable lots and/or (b) infill development within the current scale and character of the town is advised to be included as an alternative in the Program Level EIR. And/or,
- <u>Transportation Mitigation Measures</u>: Consider increasing the frequency of transit service along the Sir Francis Drake corridor, in time-certain dedicated bus (and emergency access) lanes if possible, so that (a) the limited mixed-use infill development potential in the heart of Town would qualify for funding as a TPP, (b) congestion along this corridor is minimized, and (c) a convenient timely alternative to commuting by vehicle is provided.

With regards to these points above, we invite MTC and ABAG staff to visit our Town's webpage to view our newly adopted 2010-30 General Plan within which the new Housing Element strives to address these physical limitations by utilizing the few remaining developable parcels for senior housing, workforce housing, mixed use infill development in the heart of Town near our transit hub, and including new second units in existing residential zones.

Thank you again for the opportunity to comment on the Notice of Preparation (NOP) for the Draft Environmental Impact Report for "Plan Bay Area". Should you have any questions, please do not hesitate to contact me at (415) 458-2346 or at jmoore@townoffairfax.org.

Sincerely, h. Mor

James M. Moore, MCP Town of Fairfax Director of Planning & Building Services

Cc: Mayor and Town Council Interim Town Manager Re: TransForm's EIR Scoping Comment

From: eircomments

To: mgonzalezestay@transformca.org

CC: jeff@transformca.org

BC:

Date: Tuesday - July 10, 2012 9:51 AM

Subject: Re: TransForm's EIR Scoping Comment

Thank you for your comments; they will be considered carefully during the preparation of the Plan Bay Area Environmental Impact Report (EIR). To stay updated on Plan Bay Area and the environmental process, please visit www.onebayarea.org.

The Metropolitan Transportation Commission 101 8th Street Oakland, CA 94607 (510) 817-5700

>>> Manolo González-Estay 07/05/12 4:03 PM >>> Hello

Attached is the formal scoping comment letter for the One Bay Area EIR from TransForm.

Thanks you, Manolo

--

\*Sign up to get our monthly e-news and/or action alerts at www.TransFormCA.org .\*

Manolo González-Estay, Transportation Policy Director \* Trans\*Form \*East Bay Office:\* 436 14th Street, Suite 600, Oakland, CA 94612 and/or \*South Bay Office:\* 48 South 7th Street, Suite 103, San Jose, CA 95112 510.740.3150x315 www.TransFormCA.org www.facebook.com/TransFormCA www.twitter.com/TransForm\_Alert

From:	Ashley Nguyen
To:	Brenda Dix; Stefanie Hom
Date:	7/9/2012 3:44 PM
Subject:	Fwd: TransForm's scoping comment
Attachments:	Transform_Scoping_EIR_Comments_FINAL2012-07-05.pdf

Pls see attached. Collect, compile and forward to Hannah.

Ashley Nguyen Senior Transportation Planner/Analyst Metropolitan Transportation Commission 101 Eighth Street | Oakland, CA 94607 Tel. 510.817.5809 | Fax 510.817.5848

>>> Manolo González-Estay<mgonzalezestay@transformca.org> 7/5/2012 3:55 PM >>> Hello Ashley,

Attached is our formal scoping comments letter for the One Bay Area Environmental Impact Report. In addition to offering public comments at various meetings we are submitting the attached letter. Please let me know if you have any questions or concerns.

Thank you,

Manolo

Sign up to get our monthly e-news and/or action alerts at www.TransFormCA.org (http://www.transformca.org/).

Manolo González-Estay, Transportation Policy Director

TransForm East Bay Office: 436 14th Street, Suite 600, Oakland, CA 94612 and/or South Bay Office: 48 South 7th Street, Suite 103, San Jose, CA 95112 510.740.3150x315 www.TransFormCA.org ( http://www.transformca.org/ ) www.facebook.com/TransFormCA www.twitter.com/TransForm\_Alert



July 5, 2012

Ashley Nguyen, EIR Project Manager Metropolitan Transportation Commission (MTC) Joseph P. Bort MetroCenter 101 8<sup>th</sup> Street Oakland CA 94607

### **Re: Formal Scoping Comments for Plan Bay Area EIR**

Dear Project Manager Nguyen,

I am writing to submit TransForm's Scoping Comments for the Plan Bay Area Environmental Impact Report (EIR).

TransForm works to create world-class public transportation and walkable communities in the Bay Area and beyond. TransForm was founded in 1997 by environmental and social justice groups. These groups came together because they recognized how the quality of life and environment in the nine-county Bay Area were at risk due to poorly planned development and a transportation system too focused on just one way of getting around: driving. In the years since, TransForm has helped to win literally billions of dollars and groundbreaking policies in support of public transportation, smart growth, affordable housing, and bicycle/pedestrian safety. We have been deeply involved in the discussions on the 1998, 2001, 2005, and 2009 Regional Transportation Plans, as well as on the current Plan Bay Area.

TransForm staff members attended one of your public Scoping meetings – held on June 21, 2012 in San Jose – where we verbally offered comments. We also had the opportunity to meet with agency staff along with some other stakeholders on June 29, 2012, where we also offered verbal comments and reviewed a draft set of "Policy Measures Under Consideration" for each of eight different policy inputs. We are pleased to submit our written comments by July 11, 2012 for consideration in the Scoping phase of the EIR.

For Plan Bay Area to succeed, we believe that it needs to test of a wide range of possible policy inputs. This will allow the final plan to be constructed from the preferred scenario adopted in May plus the best elements of other alternatives tested in the EIR process. In particular, we support construction of an Equity, Environment, and Jobs (EEJ) Alternative to test the limits of Plan Bay Area. We offer the following comments. We have comments on each of the transportation-related policy measures, including multiple comments on both the Transit Network and Road Network.

- **Road Pricing:** we are disappointed to see that the scoping meetings presented the "Project" alternative (#2) with "No Pricing." It is unrealistic to assume no change in bridge toll revenues, and MTC's revenue estimates already assume some revenue from New Bridge Tolls (perhaps not up to the \$10 listed as Option D for Road Pricing). For the rest of the alternatives, we support testing a wide variety of pricing approaches, including several of the options listed on the staff handouts.
- **Parking Policies:** we are disappointed to see that the scoping meetings presented the "Project" alternative (#2) as having "Parking Status Quo". That seems to contradict the PDA and focused

growth approach. We also believe it is an unrealistic view of the trends in the region. We support testing a variety of approaches for Parking Policies.

- **Road Network:** We recommend that several of the alternatives include only HOV lane conversions for Express Lanes.
- **Transit Network:** For the EEJ alternative, we support testing the impact of an alternative with transit service, funded by shifting funds from Freeway Performance Initiatives, OBAG, and Regional Express Lanes Network.
- **Transit Network:** In conducting the EIR, MTC needs to develop an appropriate methodology to recognize that differing levels of investment in maintenance will affect regional results on a host of key measures. To date, we understand that MTC has not been able to model the difference between different levels of investment in maintenance, and we understand there are significant methodological difficulties in doing that modeling. But we suggest that it is unrealistic for the EIR to assume the same transit network regardless of how much the region invests in maintenance. If all the alternatives will have the same investment in maintenance, then figuring out this methodological problem is not as important for this EIR. But if the alternatives will have different levels of investment in maintenance, then this methodological problem is important.
- **Road Network & Transit Network:** We were pleased to hear from MTC staff, in the June 29 meeting we participated in, that projects that are only included for study in the RTP/SCS investment package, but not for construction (e.g., SR 239, BART to Livermore), will not be included in the transportation networks studied in any of the EIR alternatives.

We will continue to participate in discussions over Plan Bay Area and the EIR in the following year and look forward to seeing our comments included in the Draft EIR and later in the Final EIR.

Sincerely,

Jeff Hobson Deputy Director

From:	eircomments
To:	Brian Burkhard
Date:	7/11/2012 5:30 PM
Subject:	Re: Comment on EIR

Thank you for your comments; they will be considered carefully during the preparation of the Plan Bay Area Environmental Impact Report (EIR). To stay updated on Plan Bay Area and the environmental process, please visit <u>www.onebayarea.org</u>.

Ashley Nguyen, EIR Project Manager Metropolitan Transportation Commission 101 8th Street Oakland, CA 94607 (510) 817-5809

>>> Brian Burkhard <<u>Brian.Burkhard@transpogroup.com</u>> 7/11/2012 4:45 PM >>>

[http://www.transpogroup.com/images/TranspoGroup\_Logo\_Mark-Only.png]<<u>http://www.transpogroup.com/</u>>Brian Burkhard | Vice President

Transpo Group | Brian.Burkhard@transpogroup.com < mailto:Brian.Burkhard@transpogroup.com >

Office: 415-503-3673 | Mobile: 415-747-1008

Washington | Oregon | Idaho | California | Abu Dhabi

Design-build and deliver. Transpo is pleased to be providing ITS and Traffic Engineering

design < <u>http://www.transpogroup.com/2012/01/transpo-part-of-i-405-widening-and-express-toll-lanes-project-winni</u> <u>ng-design-build-team/</u>> as part of the team for WSDOT's I-405 NE 6th Street to I-5 Widening and Express Toll Lanes project.

This e-mail may contain information that is privileged or confidential and protected from disclosure. If you are not the intended recipient, you are hereby notified that any dissemination, distribution or copying of this e-mail is strictly prohibited. If you have received this e-mail in error, please notify the sender immediately and permanently delete it from your computer.



July 11, 2012

Ashley Nguyen, EIR Project Manager Metropolitan Transportation Commission 101 Eighth Street Oakland, CA 94607 Email: <u>eircomments@mtc.ca.gov</u>

Subject: Response to Plan Bay Area EIR Alternatives

Dear Ms. Nguyen,

As a member of the Intelligent Transportation Systems (ITS) industry, I strongly advise against removing any funding out of arterial signal timing. The proposed funding move would prevent any further benefit that traffic signal improvements have already given many municipalities in the Bay Area.

The proposed cuts to the arterial signal coordination and operations identified in the Play Bay Area EIR Scenarios #3 and #5 will significantly impact the efforts in bringing our traffic signals to the latest standards. There is a growing need to improve the largely outdated traffic infrastructure in the region. This vital infrastructure (traffic controllers, cabinets, detection equipment, firmware, signal heads, pedestrian signals, communications equipment, emergency pre-emptions, etc.) needs to be upgraded to make use of the latest technological advancements in traffic engineering.

The benefit-cost evaluations done to project to date have proven that the arterial signal coordination programs provide significant and much higher benefits compared to other programs.

Improvements in arterial signal timing go a long way in actually decreasing greenhouse gas emissions. This is done by limiting the amount of time cars stay idle at lights. One of the highest contributors to pollution is emissions related to cars idling in traffic.

Thank you for your consideration of these concerns.

Sincerely,

he allas

Brian Burkhard, PE Vice President Transpo Group

From:	eircomments
To:	Duane De Witt
Date:	7/11/2012 5:17 PM
Subject:	Re: Comments for OBAP-Scoping for Draft EIR from WOEIP.

Thank you for your comments; they will be considered carefully during the preparation of the Plan Bay Area Environmental Impact Report (EIR). To stay updated on Plan Bay Area and the environmental process, please visit <u>www.onebayarea.org</u>.

Ashley Nguyen, EIR Project Manager Metropolitan Transportation Commission 101 8th Street Oakland, CA 94607 (510) 817-5809

>>> Duane De Witt <<u>duane.woeip@gmail.com</u>> 7/11/2012 11:58 AM >>> Dear Ms. Nguyen, Please add the attached comments to the scoping process for the OBAP DEIR and give us a written response to acknowledge receipt.

Thank you for your time and consideration of this communication. Sincerely West Oakland Environmental Indicators Project. 10 July 2012

To: Ms. Ashley Nguyen, EIR Project Manager Metropolitan Transportation Commission 101 Eighth St. Oakland, Ca. 94607

Re: Comments for the Scoping of the Draft EIR for the Plan Bay Area EIR.

## Dear Ms. Nguyen,

Please include these comments in the scoping for the Draft Environmental Impact Report (DEIR) currently being considered for preparation by the Metropolitan Transportation Commission (MTC) and the Association of Bay Area Governments (ABAG). Please give us a written response acknowledging receipt of these comments.

Enduringly deprived West Oakland appears to have been neglected again by bay area planners with the One Bay Area Plan (OBAP) efforts regarding future transportation planning with a jobs-housing linkage component. Therefore these comments are made regarding the inadequacies of the "scoping" for the Draft Environmental Impact Report (DEIR) currently being considered for preparation by the Metropolitan Transportation Commission (MTC) and the Association of Bay Area Governments (ABAG).

Scoping for the DEIR needs to explore the growth of West Oakland due to Oakland city proposals for increased development in the West Oakland area currently being planned with the West Oakland Specific Plan (WOSP) process. Please do better investigation regarding the environmental impacts of urban growth in West Oakland. The following issues need to be fully investigated to address residents' concerns about the current inadequacy of the scoping for the DEIR for the OBAP.

1. Environmental issues need to be analyzed regarding the impacts of the Oakland Army Base redevelopment into an enlarged rail yard and freight transportation center for the Port of Oakland. This site is immediately next to the community of West Oakland and may have negative environmental impacts from increased train traffic, and freight truck traffic, with the accompanying air and noise pollution increases. Please analyze these developments in the DEIR for the OBAP.

2. Environmental issues associated with increased urban development from the West Oakland Specific Plan proposals need to be included for analysis by the DEIR for OBAP. This is especially true for the environmental impacts associated with the proposed changes to the transportation networks within West Oakland. Please analyze these developments in the DEIR for the OBAP. 3. Alternatives to the proposed Light Rail System (LRS) being planned for West Oakland in the WOSP need to be explored, such as a Bus Rapid Transit (BRT) system. There also needs to be a realistic analysis of what undergrounding the Bay Area Rapid Transit (BART) though West Oakland could do to enhance the local environment. Please analyze these developments in the DEIR for the OBAP.

4. Current scoping is inadequate in regards to the WOSP with its proclaimed linkages to the Oakland Army Base (OAB) and the Port of Oakland in the future. Environmental impacts of NOT having good linkages for workers at the OAB with potential housing in West Oakland would create large environmental health impacts upon local residents. Please investigate these issues deeper and further with explanations to be done with an analysis of these developments in the DEIR for the OBAP.

5. The Port of Oakland is expanding the rail yard for the use of longer trains carrying more freight, perhaps leading to more use of trucks handing freight transport at OAB. Current scoping for the DEIR is not adequate in addressing how these environmental impacts will be monitored and mitigated, if need be, for the health of West Oakland residents. Please analyze these developments in the DEIR for the OBAP.

6. The alternative of a comprehensive transportation connections and linkages plan for the entire West Oakland neighborhood in conjunction with the Oakland Army Base (OAB) redevelopment and Port of Oakland expansion at the OAB needs to be explored and adequately scoped into the DEIR for the OBAP. Please analyze these issues in the DEIR for the OBAP.

With these preliminary comments in mind our organization would be glad to provide more of our expertise and information to your efforts on the DEIR. Please feel free to contact us at your earliest convenience to provide you with more information from a more indepth discussion about the needs for West Oakland with a jobs-housing linkage with any future transportation projects funded by the MTC.

With kind regards,

Margaret Gordon and Brian Beveridge

West Oakland Environmental Indicators Project (WOEIP) 1747 14<sup>th</sup> St. Oakland, Ca. 94607 Phone # (510) 257-5640 www.woeip.org Appendix A: BIA of the Bay Area – Enclosed Materials

555 California Street 10<sup>th</sup> Floor San Francisco, CA 94104

July 12, 2012 Via Hand Delivery

Ms. Ashley Nguyen EIR Project Manager MTC Joseph P Bort MetroCenter 101 Eighth Street Oakland, CA 94607-4700

Re: <u>Plan Bay Area EIR Scoping Comments</u>

Dear Ms. Nguyen:

BIA of the Bay Area respectfully submits the following comments and material pursuant to the Notice of Preparation for the Plan Bay Draft EIR.

First, BIA supports studying as one of the alternatives the proposal submitted jointly by the Bay Area Business Coalition and the Non Profit Housing Association (Alternative 4).

Second, BIA believes it is essential for the agencies to complete the PDA Assessment also suggested by the Business Coalition. Although the region has been assigned (at its own request) a 2035 target of 15% per capita GHG reduction, SB 375 clearly provides that a region cannot adopt an SCS development pattern that is infeasible as defined in the statute, even if the consequence is not meeting the target. Indeed, the statute specifically contemplates such a result with its extensive provisions regarding Alternative Planning Strategies. As several of the enclosed documents establish, the feasibility of the Proposed Project's highly aggressive reliance on PDAs has not been established. In fact, they represent substantial evidence that it is not based recent analyses completed by the agencies and the best currently available information, as does the recent quote from the agencies' own consultant Karen Chapple that "it's just basically impossible to implement." For this reason, the only legitimate way that the agencies could provide substantial evidence supporting the specified level of PDA development is through a comprehensive PDA Assessment as the agencies' themselves recognized and committed to undertake in the 2010.

Third, related to the feasibility requirement of SB 375, is the requirement in federal law for regions required to undergo conformity determinations under the federal Clean Air Act, to adopt an RTP land use pattern that is realistic and achievable. Federal guidance on this issue provides that substantial deviations from prior development trends will not meet these requirements unless supported by persuasive evidence, as the attached material makes clear.

Fourth, with respect to the FOCUS PDA program, it is important the DEIR explain specifically what PDAs are and what they are not: To quality as a PDA, it is not necessary that the PDA be consistent with the jurisdiction's general plan, zoning, or other land use policies; PDAs also must comply with the minimum density requirements in the Station Area Planning Manual, and to adequately inform the public and decision makers, the DEIR should thoroughly EIR Scoping Comments July 12, 2012 Page Two

disclose the place types and associated densities provided in the Station Area Planning Manual, and the fact that the PDAs must be developed at least at the minimum density for the relevant place type, as confirmed in the FOCUS PDA application and related guidelines. The specifics of the PDA process, rather than vague generalizations about its purpose and potentially beneficial results it may bring, is essential to comply with CEQA's informational purposes. In addition, PDA resolutions of support from jurisdictions do not undergo any CEQA compliance; to our knowledge over 200 PDA applications have been approved and not one has been formally rejected in a vote by ABAG; also, following the elimination of redevelopment agencies, several local officials were quoted as saying that their own approved PDAs were no longer even potentially feasible. Again, this supports the need for a thorough PDA-by-PDA analysis as proposed by the Business Coalition.

Fifth, CEQA case law provides that only reasonable and potentially feasible policies and mitigation measures may be studied in an EIR. One of the proposed alternatives relies on a regional development fee imposed by BAAQMD (an Indirect Source Fee). Not only would such a fee require 2/3 voter approval by the entire region under recently approved constitutional requirements in Proposition 26, but more importantly it is manifestly not within the authority of either co-lead agency. It is therefore improper to include this "policy lever" (or any similar increased developer fees or regulatory mandate by local jurisdictions), because it is known with certainty that these measures are legally infeasible as defined by CEQA.

Sixth, we strongly support the statement in the NOP that local lead agencies will determine whether individual projects are consistent with the SCS. We also suggest that the agencies acknowledge that for purposes of "traditional" CEQA tiering (as opposed to the SB 375 statutory exemptions), the criteria for consistency may not be the same.

Seventh, we request amplification on the issue of UGBs as they are described in the NOP. It is unclear what is meant by the different levels of "compliance" with UGBs. If the DEIR is going to explore this area, it should identify each local UGB or equivalent that it is purporting to analyze, and describe with particularity the current elements of the UGB (i.e., does it require voter approval to change?; does it require supermajority approval by elected officials to change? What are the details of any recent changes (if any) in the last 10 years?

Eighth, the DEIR should acknowledge the consistent description and presentation of the policy-based *Projections* land use patterns as aggressive and distinctly different than a trends or business-as-usual scenario.

Tbank vou.

Paul Campos // Sr. VP & General Counsel



BUILDING INDUSTRY ASSOCIATION

#### Enclosed Material

- Parts of Final EIR for T2030
- Excerpt of Response to Comments for T2030
- Parts of Final EIR for T2035
- Parts of DEIR for T2035

6.0

- Plan Bay Area Draft TIS (esp. p.5)
- Sept 27, 2010 ABAG Memo on PDA Assessment
- Oct. 2, 2009 FOCUS email on PDA Assessment
- Nov. 23, ABAG memo on PDA Assessment
- San Francisco Bay Area Housing Needs Plan (2007-2014)
- Shaping the Future of the Nine-County Bay Area, Final Report (2002)
- Shaping the Future of the Nine-County Bay Area, Alternatives Report (2002)
- May 1, 2008 ABAG Memo on Projections 2009
- Jan. 29, 2008 ABAG Memo on Performance Targets and Projections 2009
- Building Forward, Record of Proceedings of SB 375 Conference (esp. remarks of federal officials regarding federal planning requirements at pp. 33-35)
- Jan. 4, 2007 ABAG Memo on RHNA
- July 1, 2006 ABAG Memo on Projections 2007
- May 17, 2012 ABAG Memo on RHNA
- FOCUS PDA Application
- FOCUS PDA Application Guidelines
- May 17, 2010 MTC Memo to RTAC re GHG targets
- April 11, 2011 Memo and Letters from San Francisco
- June 13, 2012 article from SF Public Press
- May 12, 2012 article from SF Examiner
- June 26, 2012 article from WSJ
- Downtown Berkeley Development Feasibility Study
- Excerpt from ECHO analysis
- Minutes of MTC Planning/ABAG Administrative Committee dated 9/10/10
- MTC/ABAG response to Business Coalition April 2012 letter
- May 18, 2010 data transmittal memo from 4 MPOs to CARB
- May 25, 2010 MTC Presentation "What Would It Take to Achieve the Best Alternative?"
- EPA Guidance
- Policies for the Bay Area's Implementation of SB 375
- SF Bay Area Transportation Air Quality Conformity Protocol

Published on SF Public Press (http://sfpublicpress.org)

Home > Cities resist regional plan to limit sprawl

## Cities resist regional plan to limit sprawl

By Angela Hart [1] SF Public Press — Jun 13 2012 - 2:44pm

A high-profile effort to focus new Bay Area housing into energy-efficient transit villages is seen as unworkable even as it makes its public debut this summer, say urban planners, because regional government lacks the authority to make cities build dense urban neighborhoods. The three-decade Plan Bay Area, unveiled in May, is the product of more than two years of research on the region's demographics, economy, transportation and architecture. Proponents say "smart growth" could be the future of the Bay Area — if regiona either the legal tools to enforce the grand vision or enough money to make it worthwhile for cities to participate.

BART is just steps away from a new senior housing complex rising in West Oakland. Planners say more transit-oriented developments will discourage driving, improve street life and cool the planet. Photo by Jason Winshell / SF Public Press. [2]

A tabletop model of the Bay Meadows housing development that will rise next door to a Caltrain station in San Mateo. Photo by Jason Winshell / SF Public Press. 3

Commuter traffic on the San Francisco-Oakland Bay. Photo by Tearsa Joy Hammock / SF Public Press. [4] Image Jason Winshell [5]

Tearsa Joy Hammock [6]

# Weak regional agencies could miss pollution targets if they are unable to persuade local leaders to change

A high-profile effort to focus new Bay Area housing into energy-efficient transit villages is seen as unworkable even as it makes its public debut this summer, say urban planners, because regional government lacks the authority to make cities build dense urban neighborhoods.

The three-decade Plan Bay Area, unveiled in May, is the product of more than two years of research on the region's demographics, economy, transportation and architecture. Proponents say "smart growth" could be the future of the Bay Area — if regional agencies had either the legal tools to enforce the grand vision or enough money to make it worthwhile for cities to participate.

But authors of the plan say that so far it remains more symbolic than realistic, because they have no recourse if cities decline to channel home building away from sprawl and into walkable and

transit-friendly areas. And local governments became less able to afford their own infrastructure projects after this year's elimination of all local redevelopment agencies in California.

Egon Terplan, regional planning director at the San Francisco Planning and Urban Research Association, admitted it might be a harsh critique, but the effort "becomes, as a planning document, kind of useless. It's more of a political document."

He said "micro-negotiations" among hundreds of local leaders have fractured the idealistic vision, as many cities scramble to toss housing growth requirements to their neighbors like hot potatoes.

## POLITICS IS LOCAL

The problem stems from the weak state laws that spurred the plan. Without real enforcement, regional agencies must seek political consensus among 110 local and county governments. And without their buy-in, the Bay Area could fail to deliver on a 2008 law requiring the state to curb per capita greenhouse gases from automobiles by 15 percent by 2035. Plan Bay Area has so far accounted for a reduction of only 9 percent.

The prospect of more money, the tool most supporters say could rescue the process from political squabbling, is fading by the month as California's budget deficit deepens.

The professional staff at regional agencies rolled out the formal plan in May. Right away, they admitted they were pessimistic about achieving their main goal: limiting uncontrolled housing construction in the suburbs by steering most new development into 200 "priority development areas" in at least 60 cities, many along transit lines.

"The resources are going to be tight, but there's no way we can carry out this level of development without some sort of replacement to redevelopment," said Miriam Chion, the No. 2 planner at the Association of Bay Area Governments, which is working with the Metropolitan Transportation Commission on the plan.

"We need to leverage some state and federal support," she said. "It's not going to be easy."

Chion said smart growth could dig the Bay Area out of the housing crisis and speed economic recovery. "Infill" development can attract jobs to the urban core, encouraging housing development and new businesses in cities.

Ken Kirkey, the association's planning director, was more sanguine about the plan's chances.

"We think it can work," he said. "It's fairly optimistic, but we think not unduly optimistic. When we look at the feedback from local governments taking on most of the growth, their concern isn't that this is a bad idea. Their primary concern is: How are we going to do this?"

He was somewhat dismissive of the public opposition over the last year, particularly from vociferous anti-planning activists. "There seems to be a lot of anger in the body of politics these days."

But the current prospects for the plan seem somewhat dimmer for another key consultant, Karen Chapple, an associate professor of city and regional planning at the University of California,

Berkeley.

"This is really a great idea, but it's just basically impossible to implement," Chapple said. "People fighting it are essentially wasting their time. Because without major change at the state and federal level, nothing is going to change."

## **PUBLIC SKEPTICISM**

Planners have become more discouraged about the plan's prospects in part because of recent resistance from conservative activists, who pack meetings across the region to denounce the plan as "authoritarian" and "social engineering."

The Association of Bay Area Governments has held dozens of community meetings since 2010, some generating more than 200 oral and written comments. A small cadre of tea party activists pushed back hard against the Plan Bay Area draft. The most outspoken call the unelected regional agencies a step toward a repressive world government.

Opponents often say they don't want their towns to look like "cookie-cutter" communities or be "forced" to live in high-rise apartments.

"It seems like it takes away some freedom, that we can't live where we want to live and work where we want to work," said one of about two-dozen irate speakers during public comment at a Plan Bay Area meeting in March. Another lamented: "They want you to think you have input, but we don't."

What many protesters do not, perhaps, realize is that regional government is so weak it cannot force cities to do much of anything. Agency officials say some town leaders refuse to enact minor zoning changes to raise permitted heights of buildings in transit corridors. So there is little danger they will start relocating residents en masse.

Association officials acknowledged in a recent report that the opposition remained a significant challenge: "They're fearful of losing local character of cities and towns."

But public opinion seems at least initially skeptical of the idea of regional planning.

Planners held four focus groups in Novato, Walnut Creek and San Francisco and conducted a survey of 1,610 residents regionwide last November through January. Fifty-one percent opposed regional planning for the Bay Area, opting instead for cities and counties to plan on their own. Forty-four percent supported a regional plan.

Support for regional planning does not necessarily correlate with city size. Big cities like Oakland and small towns such as Dixon in Solano County are eager to take more housing. But Curtis Williams, city planner in the relatively well-off city of Palo Alto, said his and other small and midsize places are already built out.

Under the climate-change legislation, all regions in the state must have a "sustainable communities strategy" to help reduce greenhouse gas emissions by getting commuters out of their cars. The Bay Area plan also aims to build enough housing in cities to accommodate all

income levels over the next 30 years.

But cities sometimes have other priorities, and many were facing steep budget cuts year after year even before state funding vanished.

Ken Moy, legal counsel for the Association of Bay Area Governments, said cities are not obliged to act in accordance with the plan. "No," he said, "the state won't come after you."

The agency enforcing the climate-change laws, the California Air Resources Board, said legal action is unlikely if cities ignore it.

"We're still in the process of working through nuts and bolts," said Dave Clergen, a spokesman for the board, which is responsible for implementing AB 32, known as the Global Warming Solutions Act, and a related Senate bill, SB 375.

"This is an ongoing process, and our goal is to get the job done, not necessarily to penalize people," Clergen said.

## HORSE TRADING

Kirkey said the problem from the start has been that each city lobbies for its own interests. To make Plan Bay Area work, regional officials need to persuade cities to think in a regional context. The best they can hope for is a negotiation: Cities that want more growth can grab it, and others can pass.

The challenge from the start was to deal with expected Bay Area population growth in a way that treated all communities equitably while preserving the environment. The state estimates that the region will need sufficient housing for 2.1 million more people by 2040 to prevent overcrowding and long commutes. That would require the creation of about 1.1 million more jobs.

The State Department of Housing and Community Development translates those numbers into housing needs, which in March it set at 660,000 new units for the region, though some elected officials who don't want that much growth say the numbers are too high.

The Association of Bay Area Governments is not actually a government body in the sense that it can pass laws or levy taxes. It is best described as a quasi-governmental group. It calls itself "part regional planning agency and part local government service provider." Each of 101 cities in the region and nine counties has one vote. Most of those cities want to lead the organization, not follow.

Chion said the combination of a grand vision and the lack of enforcement power is a recipe for coming up short: "Cities are not required to match their general plans with the regional effort. This plan provides a sense of direction for the type of development we would like to encourage. There are no consequences for cities that don't do anything."

Just because cities end up with more housing allocations from regional planners, they are not required to build it. All they have to do is zone for it. Cities can relax restrictions on building height, spacing between units, the distance from the curb and developers' ability to stack housing

on retail or commercial space - elements that separate suburbs from cities.

But city councils and county boards of supervisors have few tools to make dense building actually happen. Without market demand to spur private-sector investment, maps that take hundreds of hours to draw can end up on dusty shelves. So regional planners have to convince and cajole using economic arguments.

"There's an inherent supply-and-demand challenge here in the Bay Area," Kirkey said. "Then you have to look at, OK, what does this mean in terms of housing demand, and how much housing as a region can we produce."

### **DEVELOPERS DECIDE**

That approach puts success in the hands of private developers who are more concerned about sales than innovating mixed-use developments that planners say are good for the region.

The problem has deep historical roots. Regional planners are trying to change the pattern that led to the rise of post-World War II suburbia: voracious expansion into open space far from city centers, areas that were accessible only by car. But in recent decades, cities have increasingly sought to build housing within existing urban growth boundaries, preventing encroachment into green spaces.

But with the financial woes plaguing the housing industry since 2008, few projects are getting built. A consensus has emerged among policymakers that the region does not have enough money — either public or private — to do much with the regional planning document right now.

Though the Association of Bay Area Governments barely has any money itself, it has worked with the Metropolitan Transportation Commission to create a pool of funds called One Bay Area grants. Over four years, the agencies will distribute the \$320 million fund to cities to pay for road repairs, affordable housing and programs to encourage walking or riding bikes. Another \$475 million will go to regional projects.

"It sounds like a lot of money, but when you split it up, it's not," Kirkey said.

The most recent financial blow came last February, when Gov. Jerry Brown killed 400 redevelopment agencies, depriving cities of hundreds of millions of dollars for infrastructure.

## **NO HOUSING WITHOUT JOBS**

When the Association of Bay Area Governments released its list of priorities in May, job growth topped the list. All other activities — housing for all income levels, infrastructure for walkable communities and environmental protection — ranked lower. "Planning in advance for job growth should result in more jobs for the economy, better neighborhoods, improved transportation choices, lesser taxes, better schools and a higher quality of life for residents," the agency said.

But that kind of "win-win" language glosses over a key dilemma, said Terplan from the San Francisco Planning and Urban Research Association. Cities want to attract businesses because they bring in more tax dollars than does housing. But they need housing to attract workers. This

leads to a chicken-or-egg scenario: "We quite frankly can't add a million or two million jobs unless we add lots of new housing."

He added that the solution is not transit villages, but transit-friendly jobs. "For five or six years l've been hammering this point," he said. "Lots of studies show that if your job is right near transit, particularly regional rail transit, you are more likely to take transit than if you just live near transit."

Data show that the most job growth is expected in San Mateo, Santa Clara, Solano and Alameda counties. So those areas are the focus for Plan Bay Area housing development. Santa Clara County exemplifies the Bay Area's comparative advantage for job growth nationally. Regional planners say Silicon Valley is becoming one of the most desirable places to live and to do business. In 30 years, Palo Alto and Sunnyvale could be even hotter job centers.

The Bay Area's housing allocation reflects that optimism: Santa Clara's housing stock is expected to grow by 32 percent by 2040, the fastest in the Bay Area.

Economists say that if the regional plan has any chance, it will be through encouraging business to generate the same kind of rapid expansion the area relied on for decades to support a higher-than-average standard of living.

"The region could capture another 110,000 jobs of the total national growth," said Stephen Levy, director of the Center for the Continuing Study of the California Economy and one of Plan Bay Area's independent researchers. "However, it's constrained by the Bay Area's political and economic will to produce new housing."

But clearly the biggest challenge facing regional planners who want more smart growth housing is instilling that resolve in hundreds of dubious county supervisors and city council members, each of whom faces a restive electorate.

Terplan, the urban researcher in San Francisco, said he was saddened to see the specter of political negotiations cloud the state's 2008 vision of environmentally friendly growth

The idea, he said, was supposed to be about cooperation — "the region taking leadership, and saying this is where we want to go."

But that's not how it's gone so far, he lamented: "It doesn't have enough policy tools to achieve concentrated planning."

Read full coverage of Bay Area smart growth in the <u>San Francisco Public Press Summer 2012</u> print edition [7], on sale at retail outlets around San Francisco and <u>online</u> [8].

 Filed in:
 Land use [9]
 Infrastructure [10]
 San Francisco [11]
 Bay Area Smart Growth [8]

 Summer 2012 [7]
 Association of Bay Area Governments [12]
 climate change [13]
 housing [14]

 Metropolitan Transportation Commission [15]
 Plan Bay Area [16]
 population [17]
 smart growth

 [18]
 sprawl [19]
 tea party [20]
 urban planning [21]

Source URL: http://sfpublicpress.org/news/2012-06/cities-resist-regional-plan-to-limit-sprawl

.....

#### ABSTRACT

1

0.000

#### Resolution No. 3757

This Resolution approves the "San Francisco Bay Area Transportation Air Quality Conformity Protocol," listed as Attachment A (conformity procedures) and Attachment B (interagency consultation procedures), for determining the conformity of the Regional Transportation Plan and Transportation Improvement Program with federal air quality plans and procedures. These two Attachments constitute the "Conformity SIP" (the conformity portion of the federal air quality plan, called the State Implementation Plan) for the San Francisco Bay Area.

This Resolution will be submitted to the California Air Resources Board (ARB) and the U.S. Environmental Protection Agency (EPA) for approval as revisions to the California State Implementation Plan (SIP), which governs transportation conformity and decisions in the San Francisco Bay Area.

Date: June 28, 2006 W.I.: 1412 Referred by: Planning Committee

#### Re: Approval of San Francisco Bay Area Transportation Air Quality Conformity Protocol

1

(1, 1, 2)

#### METROPOLITAN TRANSPORTATION COMMISSION RESOLUTION NO. 3757

WHEREAS, the Metropolitan Transportation Commission (MTC) is the regional transportation planning agency for the San Francisco Bay Area pursuant to Government Code § 66500 et seq.; and

WHEREAS, the Bay Area Air Quality Management District (BAAQMD), Association of Bay Area Governments (ABAG) and MTC are collectively responsible for developing and implementing various portions of the federal air quality plans in the San Francisco Bay Area; and

WHEREAS, prior to adopting or amending the long-range Regional Transportation Plan (RTP) and Transportation Improvement Program (TIP), MTC must first determine that these plans and programs conform to the federal air quality plan for the San Francisco Bay Area (termed the State Implementation Plan, or SIP) using procedures established by the U.S. Environmental Protection Agency (EPA); and

WHEREAS, the three agencies have prepared a protocol for determining transportation air quality conformity in compliance with Federal regulation entitled: San Francisco Bay Area Transportation Air Quality Conformity Protocol ("the Protocol"), which includes certain conformity procedures relating to transportation plans,programs, and projects and the interagency consultation procedures, attached hereto as Attachment A and Attachment B, respectively, and incorporated herein as though set forth at length; and

WHEREAS, the three agencies have revised the Protocol to reflect the most recent guidance provided by the U.S. EPA; and

WHEREAS, Federal regulations for amending the SIP require a public hearing prior to adoption or changes to the Protocol, and the BAAQMD, and ABAG have delegated authority to MTC to hold a public hearing on the Protocol as proposed herein; and

WHEREAS, MTC held a duly noticed public hearing on June 9, 2006; and

WHEREAS, at the conclusion of the public hearing, the Protocol was referred back to the three respective agencies along with the public comments and staff recommendations that each agency adopt the new Protocol; and

WHEREAS, the Protocol must be submitted to the California Air Resources Board (ARB) for review and subsequent submittal to the U.S. Environmental Protection Agency (EPA) for revision of the California State Implementation Plan (SIP), now therefore be it

<u>RESOLVED</u>, that the Protocol to be included in the Conformity SIP are approved for submission to CARB and to EPA; and, be it further

<u>RESOLVED</u>, that the MTC staff may make minor adjustments, as necessary, to the Protocol in the Conformity SIP in response to ARB and EPA comments; and, be it further

RESOLVED, that this resolution supercedes MTC Resolution No. 3075.

#### METROPOLITAN TRANSPORTATION COMMISSION

Jon Rubin, Chair

The above resolution was entered into by the Metropolitan Transportation Commission at a regular meeting of the Commission held in Oakland, California, on June 28, 2006. Date: June 28, 2006 W.I.: 1412 Referred by: Planning Committee

> Attachment A Resolution No. 3757 Page 1 of 1

#### SAN FRANCISCO BAY AREA TRANSPORTATION AIR QUALITY CONFORMITY PROTOCOL

 $\mathbf{r}$ 

#### **Conformity Procedures**

Current federal law does not require that EPA's detailed procedures for determining the conformity of plans, programs and projects be included in the Conformity SIP. Therefore, Part 93 of MTC's conformity procedures (MTC Resolution 3075), which includes verbatim EPA's transportation conformity regulation from 40 CRF Part 93, is deleted in entirety, with the exception of sections 93.122(a)(4)(ii) and 93.125(c), which address enforceability of certain assumptions about project mitigation and other control measures, if these assumptions are used as part of a conformity determination (see below).

In accordance with sections 93.122(a)(4)(ii) and 93.125(c), prior to making a conformity determination for the RTP or TIP that relies on a project level mitigation measure or on a control measure that is not in the RTP or TIP, MTC will ensure that written commitments have been been made by the appropriate entity.

Date: June 28, 2006 W.I.: 1412 Referred by: Planning Committee

> Attachment B Resolution No. 3757 Page 1 of 15

#### SAN FRANCISCO BAY AREA TRANSPORTATION AIR QUALITY CONFORMITY PROTOCOL

#### **Interagency Consultation Procedures**

#### I. General

1

These procedures implement the interagency consultation process for the nine-county San Francisco Bay Area, and include procedures to be undertaken by the Metropolitan Transportation Commission (MTC), California Department of Transportation (Caltrans), Federal Highway Administration (FHWA), Federal Transit Administration (FTA), State and local air agencies and U.S. EPA, before making transportation conformity determinations on the Regional Transportation Plan (RTP) and Transportation Improvement Program (TIP). Air quality planning in the Bay Area is the joint responsibility of the Metropolitan Transportation Commission (MTC), Association of Bay Area Governments (ABAG) and the Bay Area Air Quality Management District (BAAQMD).

#### Air Quality Conformity Task Force

To conduct consultation, staff involved in conformity issues for their respective agencies will participate in an Air Quality Conformity Task Force, hereafter referred to as the "Conformity Task Force." The Conformity Task Force is open to all interested agencies, but will include staff of:

- Federal agencies: FHWA, FTA, EPA
- State DOT: Caltrans
- Regional planning agencies: MTC, ABAG
- · County transportation agencies: all CMAs,
- State and local air quality agencies: California Air Resources Board and BAAQMD
- Transit operators

MTC will maintain a directory for the current membership of the Conformity Task Force. MTC will chair the Conformity Task Force and will consult with members of the Conformity Task Force to determine items for meeting agendas and will transmit all meeting materials. Agendas and other meeting material will generally be transmitted seven days in advance of meetings, or on occasion, distributed at the meetings. MTC will prepare summary minutes of each meeting. Any member of the Conformity Task Force listed above can request MTC to call a meeting of this group to discuss issues under the purview of the Conformity Task Force as described below,

MTC Resolution No. 3757 Page 2

including whether certain events would trigger the need to make a new conformity determination for the Regional Transportation Plan (RTP) and Transportation Improvement Program (TIP).

Persons of any organizational level in the member agencies may attend meetings of the Conformity Task Force. All meetings of the Conformity Task Force will be open to the public.

Meeting frequency will be at least quarterly, unless there is consensus among the federal and state transportation agencies and air quality agencies to meet less frequently. MTC will also consult with these agencies to determine which items may not require a face-to-face meeting and could be handled via conference call or email.

#### II. Consultation on Regional Transportation Plan (RTP) and RTP Amendments

#### a. RTP Consultation Structure and Process

The mechanism for developing the RTP and for reviewing RTP documents is through The Bay Area Partnership or its successor. MTC is responsible for convening meetings of The Bay Area Partnership and its subcommittees.

The Bay Area Partnership, hereafter referred to as the "Partnership", was established in 1991 by MTC as a strategic alliance to advise and implement the mandates of the Intermodal Surface Transportation Efficiency Act of 1991. The Partnership includes representatives of all federal, state and local transportation agencies involved in developing and implementing transportation policies and programs in the nine-county San Francisco Bay Area as well as other regional agencies, such as the BAAQMD, ABAG, and Bay Conservation and Development Commission (BCDC). The Conformity Task Force member agencies, including EPA and ARB, are represented on the Partnership, and therefore the Conformity Task Force member agencies may participate directly in the Partnership membership changes are frequent and expected. The current membership of the Conformity Task Force will be included in the Partnership directory.

Early in the RTP development process, MTC will develop a schedule for key activities and meetings leading up to the adoption of the RTP. In developing the draft RTP, MTC brings important RTP-related issues to the Partnership for discussion and feedback. MTC is responsible for transmitting all materials used for these discussions to the Partnership prior to the meetings, or on occasion, may distribute materials at the meetings. All materials that are relevant to interagency consultation, such as the RTP schedule, important RTP-related issues, and draft RTP, will also be transmitted to the Conformity Task Force for discussion and feedback. Similar consultation will occur with RTP amendments although amendments to the RTP are few and infrequent.

Public involvement in development of the RTP and RTP Amendments will be provided in accordance with MTC's adopted public involvement procedures. Key RTP supporting documents are posted on MTC's Web site for reference.

Policy decisions and actions pertaining to the RTP are the responsibility of MTC and will be made through MTC's Commission and its standing committee structure. The MTC standing committee currently in charge of the RTP is the Planning Committee, but changes to committee names can be expected from time to time. Comments received on important RTP-related issues and materials will be reviewed and considered by MTC staff in preparation of issuing a draft and final RTP for public review. MTC staff will respond to all significant comments, and the comments and response to comments will be made available for discussion with the Planning Committee and the Commission. MTC will transmit RTP-related materials to be discussed at the Planning Committee and Commission meetings to the Conformity Task Force prior to the meeting, or on occasion, may distribute materials at the meetings. Staff and policy board members of Conformity Task Force agencies may participate in these meetings.

<u>b. Agency Roles and Responsibilities</u>. Development of the RTP will be a collaborative process with agencies participating through participation the Partnership and/or MTC Commission and its standing committees. The following are the expected participation of key agencies in RTP development and review.

Agency	Roles
MTC	As the MPO for the San Francisco Bay Area, MTC develops, coordinates, circulates and provides for public involvement prior to adopting the RTP. Develops supporting technical documents, environmental documents, public information and other supplemental reports related to RTP. Prepares conformity analysis for RTP and makes conformity findings prior to adoption. Includes funding for TCMs in RTP. MTC Commission will act as the final policy body in the development and adoption of the RTP.
ABAG	Adopts long-range land use and demographic projections for the Bay Area. Provides detailed demographic data to MTC for travel forecasting and regional emissions analysis.
California DOT (Caltrans)	Project initiator for all state highway projects in the MTC region. Works directly with MTC in providing and reviewing detailed technical programming information. Defines the design concept and scope of projects in the RTP to conduct regional emissions analysis. Promptly notifies MTC of changes in design concept and scope, cost, and implementation year of regionally significant projects. Conducts project level CO and PM hotspot analyses. Identifies and commits to project level CO and PM mitigation measures, as required. Implements TCMs for which Caltrans is responsible in a timely fashion.
California ARB	Develops, solicits input on and adopts motor vehicle emissions factors; seeks EPA approval for their use in conformity analyses.
BAAQMD	Reviews and comments on all aspects of the conformity determinations for the RTP.
EPA	Administers and provides guidance on the Clean Air Act and Transportation Conformity regulations. Determines adequacy of motor vehicle emissions budget used for making RTP conformity findings. Reviews and comments on conformity determinations for the RTP.
Local Municipalities	Local municipalities propose projects for inclusion in the RTP and provide related information on design concept and scope for all regionally significant projects, including facilities where detailed design features have not yet been decided. Promptly notifies MTC of changes in design concept and scope, cost, and implementation year of regionally significant projects that would affect a new conformity analysis. Conducts project level CO and PM hotspot analyses. Identifies and commits to project level mitigation measures for CO and PM, as required. Implement TCMs for which local governments have responsibility in a timely fashion.

Agency	Roles
Local	Project initiators for certain road and transit projects. See above Local Municipalities.
Transportation	
Agencies	
(CMAs, Transit	
Operators)	
FHWA/FTA	FHWA and FTA consult with EPA on finding that the RTP conforms to the SIP. Provide guidance on transportation planning regulations. Ensure that all transportation planning and transportation conformity requirements contained in 23 CFR Part 450 and 40 CFR Part 93, respectively, are met.

\* While these are the key areas and agencies involved in the development of the RTP, participation in the RTP process by other agencies may occur.

### c. Consultation on RTP and RTP Amendment Conformity Analysis

Consultation on the assumptions and approach to the conformity analysis of the RTP or RTP Amendment will occur during the preparation of the draft RTP or RTP Amendment. MTC typically starts discussing the assumptions and approach to the conformity analysis with the Conformity Task Force at least two to three months prior to the conformity analysis being conducted. Early in the RTP or RTP Amendment development process, MTC will consult with the Conformity Task Force on, at a minimum, the following topics:

- Travel forecasting and modeling assumptions
- Latest planning assumptions
- Motor vehicle emission factors to be used in conformity analysis
- Appropriate analysis years
- Key regionally significant projects assumed in the transportation network and the year of operation
- Status of TCM implementation
- Financial constraints and other requirements that affect conformity pursuant to Federal Statewide and Metropolitan Planning regulations.
- Reliance on a previous regional emissions analysis
- The need for an Interim RTP (in the event of a conformity lapse)

The preparation of the draft conformity analysis will typically begin after public review of the draft RTP or RTP Amendment since there may be changes to projects and programs resulting from further public input. MTC will transmit the results of the draft conformity analysis to the Conformity Task Force prior to releasing the draft conformity analysis for public review. The Conformity Task Force will respond promptly to MTC staff with any comments. The draft conformity analysis will be available for public review at least 30 days prior to any final action by MTC on the final conformity analysis and RTP or RTP Amendment. MTC will consult with the Conformity Task Force, as needed, in preparing written responses to significant comments on the draft conformity analysis. The draft conformity analysis will be reviewed by the MTC standing committee responsible for the RTP and will be referred to the Commission for approval. Members of the public can comment on the draft conformity analysis in writing or in person at MTC meetings prior to the close of the 30-day public review period. After the Commission approves the final conformity analysis, MTC will provide the final conformity analysis to

MTC Resolution No. 3757 Page 5

FHWA/FTA for joint review as required by 40 CRF 93.104 and 23 CRF 450.322 of the FHWA/FTA Statewide and Metropolitan Planning Rule. Copies of the final conformity analysis will also be transmitted to the Conformity Task Force and made available in the MTC/ABAG Library and MTC's Web site.

### 111. Consultation on Transportation Improvement Program (TIP) and TIP Amendments

### a. TIP Consultation Structure and Process

Similar to the RTP development, the mechanism for developing the TIP or TIP Amendments is through the Partnership or its successor. MTC is responsible for convening meetings of the Partnership and its subcommittees. These meetings are open to the public.

The Partnership includes representatives of all federal, state and local transportation agencies involved in developing and implementing transportation policies and programs in the nine-county San Francisco Bay Area as well as other regional agencies, such as the BAAQMD, ABAG, and BCDC. The Conformity Task Force member agencies, including EPA and ARB, are represented on the Partnership, and therefore the Conformity Task Force member agencies may participate directly in the Partnership process.

Early in the TIP development process, MTC will develop a schedule for key activities and meetings leading up to the adoption of the TIP. In developing the draft TIP, MTC brings important TIP-related issues to the Partnership for discussion and feedback. MTC is responsible for transmitting all materials used for these discussions to the Partnership prior to the meetings, or on occasion, may distribute materials at the meetings. All materials that are relevant to interagency consultation, such as the TIP schedule, important TIP-related issues, and draft TIP, will also be transmitted to the Conformity Task Force for discussion and feedback. Similar consultation will occur for TIP Amendments requiring an air quality conformity determination.

Public involvement in development of the TIP or TIP Amendments will be provided in accordance with MTC's adopted public involvement procedures. Key TIP supporting documents are posted on MTC's Web site for reference.

Policy decisions and actions pertaining to the TIP are the responsibility of MTC and will be made through MTC's Commission and its standing committee structure. The MTC standing committee currently in charge of the TIP is the Programming and Allocations Committee, but changes to committee names can be expected from time to time. Comments received on important TIP-related issues and materials will be reviewed and considered by MTC staff in preparation of issuing a draft and final TIP for public review. MTC staff will respond to all significant comments, and the comments and response to comments will be made available for discussion with the Programming and Allocations Committee and the Commission. MTC will transmit TIP-related materials to be discussed at the Programming and Allocations Committee and Commission meetings to the Conformity Task Force prior to the meeting, or on occasion, may distribute materials at the meetings. Staff and policy board members of Conformity Task Force agencies may participate in these meetings.

<u>b. Agency Roles and Responsibilities</u> Development of the TIP will be a collaborative process with agencies participating through the Partnership or its successor. The following are the expected participation of key agencies in TIP development and review:

Agency	Roles		
МТС	As MPO for the San Francisco Bay Area, MTC develops, coordinates, circulates and provides for public involvement prior to adopting the TIP. Develops supporting technical documents and memorandum. Ensures projects in the TIP are consistent with the RTP. Ensures project sponsors have written commitments to any CO or PM mitigation measures required as conditions to NEPA process, prior to funding approval. Prepares conformity analysis for the TIP and makes conformity findings prior to adoption. Includes funding for TCMs in the TIP to ensure timely implementation. MTC Commission will act as the final policy body in the development of the TIP, prior to submittal to Caltrans, FHWA and FTA.		
ABAG	Adopts long-range land use and demographic projections for the Bay Area. Provides detailed demographic data to MTC for travel forecasting and regional emissions analysis.		
California DOT (Caltrans)	Project initiator for all state highway projects in the MTC region. As such, works directly with MTC in providing and reviewing detailed technical programming information. Defines the design concept and scope of projects in the TIP to conduct regional emissions analysis and provides costs. Promptly notifies MTC of changes in design concept and scope, cost, and implementation year of regionally significant projects. Conducts project level CO and PM hotspot analyses. Identifies and commits to certain CO and PM mitigation measures, as required. Implements TCMs for which Caltrans is responsible in a timely fashion.		
California ARB	Develops, solicits input on and adopts motor vehicle emissions factors. Seeks EPA approval for their use in conformity analyses		
BAAQMD	Reviews and comments on all aspects of the conformity determinations for the TIP.		
EPA	Administers and provides guidance on the Clean Air Act and transportation conformity regulations. Determines adequacy of motor vehicle emissions budget used for making TIP conformity findings. Reviews and comments on conformity determinations for the TIP.		
Local Municipalities	Local municipalities propose projects for inclusion in the TIP. Responsible for informing MTC of design concept and scope and costs of all regionally significant projects, including non-FHWA/FTA funded projects when the project sponsor is a recipient of federal funds. Provides design concept and scope for facilities where detailed design features have not yet been decided. Promptly notifies MTC of changes in design concept and scope, cost, and implementation year of any regionally significant projects are in a conforming RTP and TIP (or otherwise meet the requirements of EPA conformity regulations, Sec. 93.121) prior to local approval action. Conducts project level CO and PM hotspot analyses. Identifies and commits to project level mitigation measures for CO and PM, as required. Implement TCMs for which local governments have responsibility in a timely fashion.		
Local Transportation Agencies (CMAs, Transit Operators)	Project initiators for certain road and transit projects. See above Local Municipalities.		
FHWA/FTA	FHWA and FTA consult with EPA on finding that the TIP conforms to the SIP. Provide guidance on transportation planning regulations. Ensure that all transportation planning and transportation conformity requirements contained in 23 CFR Part 450 and 40 CFR Part 93,		

Agency	Roles	
	respectively, are met.	

\* While these are the key areas and agencies involved in the development of the TIP, participation in the TIP process by other agencies may occur.

c. Consultation and Notification Procedures for Conformity Analysis of TIP and TIP Amendments

Adoption of a new TIP will occur at intervals specified in federal planning requirements, whereas TIP Amendments can be expected to occur much more frequently. Consultation on the assumptions and approach to the conformity analysis of the TIP or TIP Amendment will occur during the preparation of the draft TIP or TIP Amendment. MTC typically starts discussing the assumptions and approach to the conformity analysis with the Conformity Task Force at least two to three months prior to the conformity Task Force on the same topics listed for the RTP (see Section II.c.), as well as the additional topics listed below:

- Identification of exempt projects in the TIP
- Identification of exempt projects which should be treated as non exempt
- Determination of projects which are regionally significant (both FHWA/FTA and non FHWA/FTA funded projects)
- Development of an Interim TIP (in the event of a conformity lapse)

For TIP Amendments, MTC will consult with the Conformity Task Force as identified below:

Consultation Required in Situations Requiring a Conformity Determination, Including But Not Limited To:

- Add a regionally significant project to the TIP when it has already been appropriately accounted for in the regional emissions analysis for the RTP
- Add a non-regionally significant project to the TIP
- Add non-exempt, regionally significant project that has not been accounted for in the regional emissions analysis
- Change in non-exempt, regionally significant project that is not consistent with the design concept and scope or the conformity analysis years

In addition, notification at the beginning of the public comment period is required for major amendments that add/delete exempt project or project phases to/from the TIP and add environmental studies for non-exempt project to the TIP.

Some changes to an adopted TIP do not require consultation or notification of these changes to federal or state agencies.

### No Consultation Required:

According to FHWA/FTA/Caltrans *Procedures for Minor Modification to the FSTIP*, minor change amendments are revisions to project descriptions that do not affect the scope or conflict

MTC Resolution No. 3757 Page 8

with the environmental documents, funding revisions that are no more than \$2 million but not more than 20% of the total project cost, changes to fund sources, changes to project lead agency, changes that split or combine projects with no scope or funding changes, changes to required information for grouped projects and adding or deleting projects from grouped project listings. Per the *Procedures for Minor Modification to the FSTIP*, these types of changes are considered administrative actions and do not require any public notification or consultation.

The preparation of the draft conformity analysis will typically begin during the public review period and be completed when all changes to the proposed listing of projects and programs in the draft TIP or TIP Amendment have been finalized. MTC will transmit the results of the draft conformity analysis to the Conformity Task Force prior to releasing the draft conformity analysis for public review. The Conformity Task Force will respond promptly to MTC staff with any comments. The draft conformity analysis will be available for public review at least 30 days prior to any final action by MTC on the final conformity analysis and TIP or TIP Amendment. MTC will consult with the Conformity Task Force, as needed, in preparing written responses to significant comments on the draft conformity analysis. The draft conformity analysis will be reviewed by the MTC standing committee responsible for the TIP and will be referred to the Commission for approval. Members of the public can comment on the draft conformity analysis in writing or in person at MTC meetings prior to the close of the 30-day public review period. After the Commission approves the final conformity analysis, MTC will provide the final conformity analysis to FHWA/FTA for joint review as required by 40 CRF 93.104 and 23 CRF 450.322 of the FHWA/FTA Statewide and Metropolitan Planning Rule. Copies of the final conformity analysis will also be transmitted to the Conformity Task Force and made available in the MTC/ABAG Library and MTC's Web site.

### IV. State Implementation Plan (SIP) Consultation Process

#### a. SIP Consultation Structure and Process

The BAAQMD, MTC and ABAG have co-lead responsibilities for preparing the SIP. The SIP will normally be developed through a series of workshops, technical meetings, and public involvement forums independent of the Conformity Task Force; however, all Conformity Task Force agencies will be provided with all information and every opportunity to fully participate in the development of the SIP. The BAAQMD will provide and update schedules for SIP development that will be available to all agencies and the public. Public involvement will be in accordance with the BAAQMD's public involvement procedures. Key documents will be posted on BAAQMD's website. SIP development will normally cover inventory development, determination of emission reductions necessary to achieve and/or maintain federal air quality standards, transportation and other control strategies that may be necessary to achieve these standards, contingency measures, and other such technical documentation as required. The SIP will include a process to develop and evaluate transportation control measures as may be suggested by the co-lead agencies, other agencies, and the public.

MTC will consult with the BAAQMD and ARB in providing the travel activity data used to develop the on-road motor vehicle emissions inventory. If new transportation control strategies are necessary to achieve and/or maintain federal air quality standards, MTC will evaluate and

MTC Resolution No. 3757 Page 9

receive public comment on potential new measures through the SIP consultation process administered by the BAAQMD. This SIP process will define the motor vehicle emissions budget (MVEB), and its various components, that will be used for future conformity determinations of the RTP and TIP. Prior to publishing the draft SIP, the Conformity Task Force will have an opportunity to review and comment on the proposed MVEB.

The BAAQMD will circulate the draft SIP for public review, and all comments will be responded to in writing prior to adoption of the SIP by the co-lead agencies. The Boards of the co-lead agencies will formally adopt the submittal. The BAAQMD will then transmit the adopted submittal, along with the public notice, public hearing transcript and a summary of comments and responses, to the ARB.

### b. Agency Roles and Responsibilities

The following provides a summary on the roles and responsibilities of the different agencies with involvement in development and review of SIP submittals dealing with TCMs or emissions budgets.

Agency	Responsibilities	
МТС	MTC is a co-lead agency for development of the SIP. Responsibilities may include preparing initial drafts of SIP submittals, revising those drafts, incorporating other agencies' comments, and preparing public hearing transcripts and responding to public comments. MTC is responsible for developing regional travel demand forecasts used in the SIP emissions inventory and analysis of new TCMs. MTC develops, analyzes, and monitors and reports on implementation of federal TCMs. MTC participates in public workshops and hearings on the SIP. MTC will provide final SIP documents to the Conformity Task Force and place copies in MTC's library.	
ABAG	ABAG is a co-lead agency for development of the SIP. Responsibilities may include preparing initial drafts of SIP submittals, revising those drafts, incorporating other agency comments, and preparing public hearing transcripts and responding to public comments. ABAG's responsibilities include developing regional economic, land use and population forecasts used in developing SIP inventories. ABAG participates in public workshops and hearings on SIP submittals	
California DOT (Caltrans)	Caltrans participates through various meetings, workshops, and hearings that are conducted by the co-lead agencies.	
California ARB	ARB participates in the SIP development process in the Bay Area. ARB receives the Bay Area's SIP submittals, and upon approval, transmits them to EPA. Concurs with TCM substitution in the SIP.	
BAAQMD	BAAQMD is responsible for air quality monitoring, preparation and maintenance of detailed and comprehensive emissions inventories, and other air quality planning and control responsibilities. BAAQMD is responsible for air quality planning in the region. Its responsibilities may include preparing initial drafts of SIP submittals, revising those drafts, incorporating other agencies' comments, and preparing public hearing transcripts and responding to public comments. BAAQMD organizes and participates in public workshops and hearings on SIP submittals.	
EPA	EPA receives the Bay Area's SIP submittals from the California ARB, and has the responsibility to act on them in a timely manner. EPA directly influences the content of the submittals through regulations implementing the federal Clean Air Act. EPA also has the opportunity to influence the submittals through various meetings, workshops, and hearings that are conducted by the co-lead agencies. Provides guidance on the Clean Air Act. Determines adequacy of motor vehicle emissions budget used for making RTP/TIP conformity findings. Concurs with TCM substitution in the SIP.	
Local Municipalities	Local municipalities will also participate through various meetings, workshops, and hearings that are conducted by the co-lead agencies.	
Local Transportation Agencies (CMAs and Transit Operators)	CMAs and transit operators participate through various meetings, workshops, and hearings that are conducted by the co-lead agencies. CMAs represent the collective transportation interests of cities and counties, and, in certain cases, other local agencies.	
FHWA/FTA	Provide guidance on transportation planning regulations. Opportunities to participate in the SIP are as noted above.	

### V. Consultation process for model assumptions, design and data collection

Consultation on model assumptions, design and data collection will take place through two forums <sup>(1)</sup>:

Group	Role/Focus	Approximate Meeting Frequency
Conformity Task Force	Feedback on regional travel demand forecast model development and assumptions. Consultation on regional emission models and assumptions. Feedback on CO and PM hot spot analysis models developed by others	Quarterly, unless consensus to meet less frequently
Model Coordination Working Group of the Partnership	Consultation on regional travel model data collection, analysis, forecasting assumptions, and model development and calibration.	At the call of the Chair.

<sup>(1)</sup> Membership and meeting frequency changes are regular and expected. Committee structure is subject to change as new committees are formed or as additional committees are included in modeling consultation.

The Model Coordination Working Group focuses on regional transportation model development and coordination. The Working Group or its successor, among other duties, provides a process for consulting on the design, schedule and funding of research and data collection efforts and on development and upgrades to the regional travel demand forecast model maintained by MTC. MTC staff coordinates meetings and helps prepare agenda items. Agendas and packets are generally mailed out one week prior to each meeting. Participation is open to all interested agencies, including members of the Conformity Task Force and the public.

Significant modeling issues that affect or pertain to conformity determinations of the RTP and TIP will be brought by MTC to the Conformity Task Force for discussion prior to any conformity analysis that requires the use of the MTC travel demand forecast model. Any member of the Conformity Task Force can independently request information from MTC concerning specific issues associated with the MTC model design or assumptions, and MTC staff will make the information available.

Models for analysis of localized CO and PM10 hot spots have been developed by others, and the Conformity Task Force does not have any direct role in their development or application. The Conformity Task Force may:

- 1. Periodically review and participate with Caltrans and other agencies as appropriate in the update of these models and procedures.
- 2. Refer project sponsors to the most up to date guidance on hot spot analyses.

### VI. Project Level Conformity Determinations for Carbon Monoxide (CO)

All project level conformity determinations are the responsibility of FHWA and FTA. Project sponsors should use the most recent Caltrans procedures for CO analysis approved by CARB and the EPA. At the time a project sponsor seeks MTC project review approval (pursuant to Government Code 66518 and 66520), MTC will determine the following:

- 1. MTC staff will affirm that FHWA or FTA has approved the project level CO conformity analysis, demonstrated by FHWA or FTA approval of the project's environmental document.
- 2. That the design concept and scope of the project has not changed significantly from that used by MTC in its regional emissions analysis of the RTP or the TIP.

The Conformity Task Force may periodically review and participate with Caltrans and other agencies as appropriate in the update of the Caltrans procedures for CO analysis, and provide technical guidance to project sponsors who use these procedures.

### VII. Monitoring of Transportation Control Measures (TCMs)

The periodic conformity analyses for the RTP and TIP will include updates of the implementation of TCMs in the applicable SIP. The Conformity Task Force may request more frequent updates, as needed.

Prior to conducting a new conformity analysis for an RTP or TIP, MTC will document the status of TCMs that have not been completed, by comparing progress to the implementation steps in the SIP. Where TCM emissions reductions are included as part of the MVEB, MTC will also estimate the portion of emission reductions that have been achieved. If there are funding or scheduling issues for a TCM, MTC will describe the steps being undertaken to overcome these obstacles, including means to ensure that funding agencies are giving these TCM maximum priority. MTC may propose substitution of a new TCM for all or a portion of an existing TCM that is experiencing implementation difficulties (see below).

### VIII. Substitution of TCMs in the SIP

After consultation with the Conformity Task Force, MTC may recommend and proceed with the substitution of a new TCM in the SIP to overcome implementation difficulties with an existing TCM(s). The substitution will take place in accordance with MTC's adopted TCM substitution procedures, which provide for full public involvement. In the event of possible discrepancies between MTC's TCM Substitution Procedures and those in SAFETEA (Public Law 109-59), the provisions of SAFETEA will govern.

### IX. Other Conformity Task Force Processes and Procedures

Interagency consultation procedures for specific conformity issues are described below:

- 1. Defining regionally significant projects: Regionally significant projects are defined as a transportation project (other than an exempt project) that is on a facility which serves regional transportation needs and would normally be included in the coded network for the regional transportation demand forecast model, including at a minimum all principal arterial highways and all fixed guideway transit facilities that offer an alternative to regional highway travel. MTC's travel model roadway network may also include other types of facilities for reasons of functionality or connectivity that would not normally be considered regionally significant. MTC will periodically review with the Conformity Task Force the types of facilities and projects that are coded in the network but which MTC recommends should not be classified as regionally significant (and which therefore would not trigger a new regional emissions analysis if amended into the TIP). MTC will document the decisions of the Task Force for future reference. The Task Force will also consider projects that would not be found regionally significant for conformity purposes.
- 2. Determination of significant change in project design concept and scope: Project sponsors should provide timely notice to MTC of any change in the design concept or scope of any regionally significant project in the RTP and TIP. MTC will consider a significant change in design concept and scope to be one that would alter the coding of the project in the transportation network associated with the regional travel model. When a project(s) have a change in design concept and scope from that assumed in the most recent conformed TIP and RTP, MTC will not normally consider revisions to the RTP or TIP if such a revision requires a new regional emissions analysis for the entire Plan and TIP. MTC will evaluate projects that may be considered to have a change in design concept and scope and will consult with the Conformity Task Force prior to advising the project sponsor as to how MTC intends to proceed with any request to amend the RTP and/or TIP.
- 3. Determining if exempt projects should be treated as non-exempt: MTC will identify all projects in the TIP that meet the definition of an exempt project, as defined in the Conformity regulations. MTC will provide a list of exempt projects to the Conformity Task Force for review prior to releasing the draft TIP for public comment. If any member of the Conformity Task Force believes an exempt project has potentially adverse emission impacts or interferes with TCM implementation, they can bring their concern to the Conformity Task Force for review and resolution. If it is determined by the Conformity Task Force that the project should be considered non exempt, MTC will notify the project sponsor of this determination and make appropriate changes to the conformity analysis, as required.
- 4. <u>Treatment of non-FHWA/FTA regionally significant projects</u>: Any recipient of federal funding is required to disclose to MTC the design concept and scope of regionally significant projects that do not use FHWA or FTA funds. MTC will request that Caltrans and local agencies identify all such projects prior to conducting a new conformity analysis for the RTP

or TIP. As part of the conformity analysis, MTC will also include a written response to any significant comment received about whether any project or projects of this type are adequately accounted for in the regional emissions analysis.

- 5. <u>Projects that can advance during a conformity lapse.</u> In the event of a conformity lapse, MTC will convene the Conformity Task Force to identify projects in the RTP and TIP that may move forward. MTC will also consult the Conformity Task Force on the process for preparing an Interim RTP and TIP.
- 6. <u>Addressing activities and emissions that cross MPO boundaries</u>: When a project that is not exempt is proposed in another MPO's Plan or TIP crosses MTC's boundaries, MTC will review the project with the Conformity Task Force to determine appropriate methods for addressing the emissions impact of the project in MTC's conformity analysis, consistent with EPA's conformity regulations.

MTC's planning area includes a portion of Solano County, which is in the Sacramento air basin. The Sacramento Area Council of Governments (SACOG) is the MPO for this planning area. MTC and SACOG, in consultation with Caltrans, the State Air Resources Board, and the Governor's Office, have developed and signed a Memorandum of Understanding for undertaking conformity analysis in eastern Solano County.

### **X. Conflict Resolution**

Conflicts between State agencies, ABAG, MTC or BAAQMD that arise during consultation will be resolved as follows:

- 1 A statement of the nature of the conflict will be prepared and agreed to by the Conformity Task Force.
- 3. Staff of the affected agencies will meet in a good faith effort to resolve the conflict in a manner acceptable to all parties.
- 4. If the staff is unsuccessful, the Executive Directors or their designee of any state agency and all other parties to the conflict shall meet to resolve differences in a manner acceptable to all parties.
- 5. The parties to the conflict will determine when the 14-day clock (see below) starts.
- 6. Following these steps, the State Air Resources Board has 14 days to appeal to the Governor after Caltrans or MTC has notified the State Air Resources Board that either party plans to proceed with their conformity decision or policy that is the source of the conflict. If the State air agency appeals to the Governor, the final conformity determination must have the concurrence of the Governor. If the State Air Resources Board does not appeal to the Governor within 14 days, the MTC or State Department of Transportation may proceed with the final conformity determination. The Governor may

delegate his or her role in this process, but not to the head or staff of the State or local air agency, State department of transportation, State transportation commission or board, or an MPO.

### **XI. Public Consultation Procedures**

MTC will follow its adopted public involvement procedures when making conformity determinations on transportation plans, and programs. These procedures establish a proactive public involvement process which provides opportunity for public review and comment by, at a minimum, providing reasonable public access to technical and policy information considered by MTC at the beginning of the public comment period and prior to taking formal action on a conformity determination for the RTP and TIP, consistent with these requirements and those of 23 CFR 450.316(b). Meetings of the Conformity Task Force and Partnership are open to the public. Any charges imposed for public inspection and copying should be consistent with the fee schedule contained in 49 CFR 7.95. These agencies shall also provide opportunity for public involvement in conformity determinations for projects where otherwise required by law.

J: SECTION PLANNING AIROUAL Conformity SIP/2006 MTC 1A-Conformity 4-20-06 final.doc.

Ashley Nguyen 4/20/06 9:01 AM

Deleted: J:\SECTION\PLANNING\AIRQUAL\Co nformity SIP\2006\MTC 1A-Conformity\_4-18-06 final.doc



Association of Bay Area Governments Bay Area Air Quality Management District Bay Conservation and Development Commission Metropolitan Transportation Commission

### JOINT POLICY COMMITTEE

### Policies for the Bay Area's Implementation of Senate Bill 375 (Adopted September 18, 2009)

### Introduction

SB 375<sup>1</sup> (Steinberg) was passed by the California State Assembly on August 25<sup>th</sup>, 2008, and by the State Senate on August 30<sup>th</sup>. The Governor signed it into law on September 30<sup>th</sup>, 2008.

The bill mandates an integrated regional land-use-and-transportation-planning approach to reducing greenhouse-gas (GHG) emissions from automobiles and light trucks. Within the Bay Area, automobiles and light trucks account for about 26 percent of our 2007 GHG inventory<sup>2</sup> and about 64 percent of emissions from the transportation sector.

The bill also expands regional and local responsibilities relative to state housing objectives. It requires that the region identify residential areas sufficient to accommodate all of the Bay Area's population, including all economic groups, for 25 years; and it requires that, within three years of amending their housing elements, local governments enact zoning to implement those elements.

SB 375 explicitly assigns responsibilities to the Association of Bay Area Governments (ABAG) and to the Metropolitan Transportation Commission (MTC) to implement the bill's provisions for the Bay Area. Both agencies are members of the Joint Policy Committee<sup>3</sup> (JPC). The policies in this document were approved by the JPC and provide guidance to the two lead regional agencies in fulfilling their responsibilities in collaboration with their JPC partners, the Bay Area Air Quality Management District (Air District) and the San Francisco Bay Conservation and Development Commission (BCDC).

### Bay Area Climate-Protection Context

On July 20<sup>th</sup>, 2007, the JPC approved a *Bay Area Regional Agency Climate Protection Program*<sup>4</sup>. This program has as a key goal: "To be a model for California, the nation and the world." Following from this key goal is a supporting goal: "Prevention: To employ all feasible, cost-effective strategies to meet and surpass the State's targets of reducing greenhouse-gas emissions to 1990 levels by 2020 and to 80% below 1990 levels by 2050." In pursuit of these goals, MTC's current Regional Transportation Plan (RTP) update, *Transportation* 2035<sup>5</sup>, has

D

<sup>&</sup>lt;sup>1</sup> http://www.leginfo.ca.gov/pub/07-08/bill/sen/sb\_0351-0400/sb\_375\_bill\_20080930\_chaptered.html

<sup>&</sup>lt;sup>2</sup> Bay Area Air Quality Management District, *Source Inventory of Bay Area Greenhouse Gas Emissions*, December 2008 (http://www.baaqind.gov/pln/documents/regionalinventory2007\_003\_000.pdf)

<sup>&</sup>lt;sup>3</sup> The Joint Policy Committee (JPC) is a regional planning consortium of the Association of Bay Area Governments (ABAG), the Bay Area Air Quality Management District (BAAQMD or the "Air District"), the San Francisco Bay Conservation and Development Commission (BCDC), and the Metropolitan Transportation Commission (MTC) <sup>4</sup> <u>http://www.abag.ca.gov/jointpolicy/JPC%20Action%200n%20Climate%20Protection.pdf</u>

<sup>&</sup>lt;sup>5</sup> http://www.mtc.ca.gov/planning/2035\_plan/index.htm

evaluated transportation strategies and investment programs relative to a target of reducing GHG emissions from on-road vehicles in the year 2035 by 40 percent compared to 1990 levels. ABAG has established the same target for assessing alternative land-use scenarios in the development of the latest iteration of the region's policy-based forecast of population and employment: *Projections 2009*<sup>6</sup>.

The Bay Area's regional agencies have clearly recognized the primacy of the climate-change challenge as a driver of public transportation and land-use policy, and we have embraced the urgency of GHG reduction. The momentum established by our policies and actions to date will carry over into our implementation of SB 375. We do not regard SB 375 as a vexatious new requirement, but rather as an instrument to assist us in continuing and accelerating the climate-protection journey upon which we have already embarked. We are genuinely concerned with making real and measurable progress in reducing the impact which motor-vehicle travel has on the global warming problem. That concern will be paramount in our approach to SB 375 and is reflected in the policies which follow.

### Policy Subject 1: Setting Targets

SB 375 requires that the California Air Resources Board (CARB) set GHG-reduction targets for cars and light trucks in each California region for the years 2020 and 2035. CARB must release draft targets by June 30, 2010 and adopt targets by September 30, 2010.

To assist in establishing these targets, CARB is required to appoint a Regional Targets Advisory Committee (RTAC) composed of representatives of Metropolitan Planning Organizations<sup>7</sup> (MPOs), affected air districts<sup>8</sup>, the League of California Cities (the League), the California State Association of Counties (CSAC), local transportation agencies<sup>9</sup>, and members of the public including homebuilders, environmental organizations, environmental-justice organizations, affordable housing organizations, and others. The Advisory Committee is tasked with recommending factors to be considered and methodologies to be used in establishing the targets, not recommending the targets themselves—though MPOs are explicitly permitted to recommend targets for CARB's consideration.

In recommending factors to be considered and methodologies to be used, the Advisory Committee may consider any relevant issues, including, but not limited to, data needs, modeling techniques, growth forecasts, the impacts of regional jobs-housing balance on interregional travel and GHG emissions, economic and demographic trends, the magnitude of GHG-reduction benefits from a variety of land-use and transportation strategies, and appropriate methods to describe regional targets and to monitor performance in attaining those targets. The Advisory Committee shall provide a report with its recommendations to CARB no later than September 30, 2009, and CARB must consider the report before setting the targets. After the publication of the Advisory Committee Report, MPOs are required to hold at least one public workshop in their region. In establishing the targets, CARB is also required to exchange technical information with MPOs and associated air districts.

<sup>&</sup>lt;sup>6</sup> http://www.abag.ca.gov/planning/currentfcst/news.html

<sup>&</sup>lt;sup>7</sup> In the Bay Area, the Metropolitan Planning Organization (MPO) is MTC.

<sup>&</sup>lt;sup>8</sup> In the Bay Area, the Bay Area Air Quality Management District.

<sup>&</sup>lt;sup>9</sup> In the Bay Area, this might include Congestion Management Agencies (CMAs), transit providers, and the transportation planning/streets-and-roads arms of local governments.

Policies for the Bay Area's Implementation of Senate Bill 375

The prescribed GHG-target-setting process, including the multi-sector RTAC, creates a dynamic between *need* (i.e., the reduction required to contribute to the state's overall greenhouse-gasreduction targets) and *feasibility* (i.e., the perceived probability of satisfying that need through available regional planning and implementation mechanisms.) That dynamic may be premature and limiting. Until one goes through the actual process of producing and evaluating a target-based plan, the feasibility of that plan, and the target to which it responds, is mostly just conjecture. The necessity to limit the target based on an *a priori* judgment of feasibility is also obviated by the legislation's provision of an escape valve, the Alternative Planning Strategy (APS), which provides a mechanism to identify additional measures if target achievement proves not to be feasible in the initial plan, the Sustainable Communities Strategy (SCS).

In the 2009 RTP update and in the *Projections 2009* process, ABAG and MTC have established very aggressive GHG-reduction targets, based on the transportation sector's large contribution to the region's GHG inventory and on the science-based need to reduce GHGs to 80 percent below 1990 levels by the year 2050. The Bay Area's regional agencies are committed to achieving a significant reduction in transportation-related GHGs and are reluctant to constrain that reduction by setting targets that are too low and that do not provide sufficient challenge to business as usual. We also want to ensure our efforts are rewarded with observable progress, not just with well-intentioned but unimplemented plans.

In addition to GHG-reduction targets, SB 375 effectively requires that the region set target levels for 25 years of housing growth based on accommodating all of the region's population, including all economic segments. These housing-growth targets need to be established early so they can accompany the GHG-reduction process throughout the planning process.

### Policy 1:

The Bay Area regional agencies will fully participate in CARB's regional target-setting process. This participation will occur, to the extent possible, through the RTAC process, through the exchange of data and information with CARB, and through the authority given MPOs to independently recommend targets for their regions.

When considering whether or not to recommend targets to CARB and in determining the levels of any recommended targets, primary attention will be given to a scientific assessment of need, noting that feasibility is most accurately judged through the process of producing the Sustainable Communities Strategy itself.

In consultation with local partners and with the state Department of Housing and Community Development (HCD), the regional agencies will establish 25-year housing-growth targets, by economic group, no later that the release of final GHG-targets in September, 2010.

The regional agencies will also seek unambiguous and accurate metrics of target achievement, so that performance relative to the targets can be confidently and unarguably assessed.

### Policy Subject 2: Modeling the Relationship between Transportation and Land Use

Travel models (mathematical simulations of travel behavior relative to the regional transportation system and the distribution of land uses) are used to compare the impact of alternative transportation strategies, alternative investment packages and alternative land-use

3

patterns. The land-use patterns that are fed into the travel models are also, in part, generated by mathematical models of economic and demographic trends.

SB 375 requires that the California Transportation Commission (CTC), in consultation with the California Department of Transportation (Caltrans) and CARB, maintain guidelines for travel models. The guidelines must, to the extent practicable within resource constraints, account for:

- The empirical relationship among land-use density, automobile ownership, and vehicle miles traveled (VMT);
- The impact of enhanced transit service on vehicle ownership and VMT;
- Induced travel behavior and land development likely to result from highway or rail expansion;
- Mode splits between automobile, transit, carpool, bicycle, and pedestrian trips;
- Speed and frequency, days, and hours of operation of transit service.

SB 375 also requires that MPOs disseminate the methodology, results, and key assumptions of their travel models in a way that would be usable by and understandable to the public.

Models will be key tools in developing and assessing the alternative transportation and land-use strategies required to implement SB 375. MTC is currently replacing its travel model with a new instrument more attuned to the CTC guidelines. ABAG is about to update its land-use forecasting models.

This is an opportune time to ensure that the region's models are integrated and can be used in an iterative manner, with not only the land-use models feeding into the travel model but with the travel model also feeding back into the land-use models so that the development impacts and requirements of various transportation measures and investments can be more confidently evaluated and so that a mutually reinforcing land-use *and* transportation strategy can be constructed. At present, the relationship is very linear and one-way, with the land-use forecast informing the travel model but the travel model only indirectly influencing how we forecast land use. Achieving two-way integration will require a much closer working relationship between ABAG and MTC staff engaged in modeling and forecasting than has heretofore been the case.

While the models are very technical and complex, it is also a worthy and responsible objective to aim for more public transparency of model methodologies, assumptions and particularly limitations.

### Policy 2:

The Bay Area regional agencies will continue to work together with local partners and regional stakeholders to construct an integrated modeling system which, to the extent possible within the available time and resources, achieves these essential qualities:

• **Transparency**—technical, decision-maker and public understanding of how land-use and transportation decisions can be coordinated so as to reduce GHG emissions, facilitated through open disclosure and explanation of assumptions and methodologies, but without over-simplifying complex relationships;

Policy 2 (continued):

- **Comprehensiveness**—sensitivity to the many factors that influence individual and collective land-use and transportation choices, including, but not limited to: energy prices, parking prices and availability, transportation usage charges, travel-time comparisons among alternative modes, housing affordability, employment locations, perceived school quality, perceived public safety, and the presence or absence of complementary uses, supportive design and other community amenities or liabilities;
- **Resolution**—Spatial and temporal data and analysis at the highest possible level of detail (e.g., below the census tract level and for additional hours beyond just weekday peak periods), but without making the modeling results so dependent on detail that they become unreliable with small variations in the underlying assumptions;
- Uniformity—Full involvement of the CMAs and others who engage in complementary modeling activities to facilitate commonality and compatibility among models and a consistent modeling system which extends beyond the regional agencies;
- Appropriate Usage—Explicit recognition of the limitations of models in accurately predicting the future and guiding choice (They are representations of potential reality, not reality itself, and are best employed to help differentiate among alternative strategies, not to predict the precise results of a single strategy. They inform decisions; they do not make decisions.).

# Policy Subject 3: Preparing a Sustainable Communities Strategy and an Alternative Planning Strategy

SB 375 requires that each MPO (MTC and ABAG in the Bay Area) prepare a sustainable communities strategy (SCS). This strategy is to, among other things, constitute the land-use forecast for the Regional Transportation Plan (RTP) and must comply with federal requirements for that forecast, including most importantly that it be judged to be realistically attainable during the twenty-five-year period of the RTP. One criterion for judging realistic attainability is congruence with local-government general plans, specific plans and zoning.

The SCS shall be adopted as part of the RTP<sup>10</sup> and shall:

- Identify the general location of uses, residential densities, and building intensities within the region;
- Identify areas within the region sufficient to house *all* the population of the region, including all economic segments of the population, over the course of the planning period of the RTP (i.e., 25 years), taking into account net migration into the region, population growth (presumably referring to natural increase), household formation, and employment growth;

<sup>&</sup>lt;sup>10</sup> The next RTP update, and the first to which SB 375 will apply, is scheduled to be adopted in March 2013.

- Identify areas within the region sufficient to house an eight-year projection of the regional housing need;
- Identify a transportation network to service the transportation needs of the region;
- Gather and consider the best practically available scientific information regarding resource areas and farmland in the region;
- Consider state housing goals;
- Forecast a development pattern for the region, which when integrated with the transportation network and other transportation measures and policies, will achieve, to the extent practicable, the targeted greenhouse-gas emission reduction from automobiles and light trucks, while also permitting the RTP to comply with the Clean Air Act;
- In doing all of the above, consider spheres of influence that have been adopted by LAFCOs.

Some believe that the SCS is just ABAG's *Projections* under another name and with slightly different prescriptions and constraints. It is much more than that. While the SCS will, in part, play a role similar to *Projections* in the RTP, it is not just a land-use forecast, but a preferred development pattern *integrated* with the transportation network and with transportation measures and policies. It approaches in intent and content a comprehensive land-use and transportation plan for the region. As such, it should play a more fundamental guiding role for the RTP than does *Projections*, which is mostly used now for the Environmental Impact Report (EIR) and for air quality conformity analysis accompanying the RTP.

The SCS also performs an important role in housing planning, extending well beyond the current *Projections* series and the current Regional Housing Needs Allocation (RHNA) process. The SCS must specifically identify areas within the region sufficient to accommodate twenty-five years of future housing demand from all income categories. 7

Before adopting the SCS, we will be required to quantify the reduction in greenhouse-gas emissions projected to be achieved by the SCS and identify the difference (if any) between that reduction and the CARB targets for the region.

If the SCS is unable to reduce greenhouse gas emissions to the targeted levels, then we must prepare an Alternative Planning Strategy (APS) showing how the greenhouse-gas targets would be achieved through alternative development patterns, infrastructure, or additional transportation measures or policies. The APS is a separate document from the RTP but may be adopted at the same time as the RTP. In preparing the APS, we are required to:

- Identify the principal impediments to achieving the targets through the SCS;
- Describe how the GHG targets would be achieved by the alternative strategy and why the development pattern, transportation measures and transportation policies in the APS are the most practicable choices for the achievement of those targets;
- Ensure that the APS complies with all the federal requirements for an RTP "except to the extent that compliance with those requirements would prevent achievement of the GHG targets" (i.e., the APS is essentially exempted from the criterion of realistic attainability);

Policies for the Bay Area's Implementation of Senate Bill 375

• Develop the APS in the same manner and consider the same factors as we would to develop an SCS.

The APS is essentially a more aggressive GHG-reduction strategy than would be permissible under the federal requirements for an RTP—i.e., financially constrained and with a realistic land-use forecast.

As the SCS is an official part of the RTP, it is required by federal law to be internally consistent with the other parts of the RTP, including the financially constrained transportation investment package. This is what gives the SCS its potential power: transportation projects identified for funding in the RTP investment package must be consistent with the SCS<sup>11</sup>.

As the APS is not included in the RTP and therefore does not influence transportation investment, its potential impact is much more limited. It serves essentially two purposes, the first explicit in the legislation, the second implicit: (1) to provide access to some California Environmental Quality Act (CEQA) concessions for qualifying development projects<sup>12</sup>, and (2) to provide a means through which the state can be informed of additional powers, authorities or resources required to meet regional GHG-reduction targets.

The Bay Area's regional agencies are committed to making a real difference in reducing GHGs. Therefore, it is in our interest to achieve as much progress toward this region's targets in the SCS as possible. Those land-use changes, transportation measures and transportation policies which can only be identified in the APS are essentially those that we have conceded cannot be implemented; that is, we cannot provide the required assurances to the federal government that those changes, measures, and policies meet the realism test—at least not within the current distribution of authorities. If the changes, measures and policies are not real, then the GHG reductions are also not real. We will not attain the on-the-ground improvement we desire and need.

Meeting the realism test for the SCS requires two preconditions: (1) alignment of local land-use  $\varkappa$  policy with the preferred land-use pattern in the SCS<sup>13</sup> and (2) authority and resources to undertake the required transportation policies and measures. To maximize our probability of

<sup>&</sup>lt;sup>11</sup> The legislation specifically excludes a subset of investment projects from this requirement, including Proposition 1-B projects and projects contained in the 2007 or 2009 Federal Statewide Transportation Program (STP) if programmed for funding on or before the end of 2011, Local funding for projects specifically listed in local sales tax measures approved prior to the end of 2008 is also exempt from the consistency requirement, though state and federal matching funds, if any, are not exempt. Further, the legislation does not require a sales tax authority to change the funding allocations approved by voters for categories in a sales tax measure adopted before the end of 2010.

<sup>&</sup>lt;sup>12</sup> CEQA concessions are extended to two potentially overlapping types of development projects: (1) a residential or mixed-use project consistent with an SCS or APS; and (2) specifically defined "transit priority projects" (TPPs). Subject to incorporating mitigation measures from previous reviews, the EIRs for SCS- or APS-consistent projects will not be required to address growth-inducing impacts, global warming impacts, or regional transportation network impacts. Further SCS- or APS-consistent development projects will not have to prepare a reduced-density alternative to address local traffic impacts. TPPs will be exempt from CEQA review if they are consistent with an SCS or APS and comply with a long list of other mandatory and optional criteria.

<sup>&</sup>lt;sup>13</sup> SB 375 explicitly provides that neither the SCS nor the APS will regulate the use of land or supersede the exercise of the land-use authority of cities and counties. It further stipulates that there is no requirement that a city's or county's land-use polices and regulations, including its general plan, be consistent with the RTP (including the SCS) or with the APS. Therefore, alignment of local land-use policy with the SCS will have to be voluntary.

success, we need to be acquiring those preconditions now, building upon the momentum that we have established with the target driven RTP, *Transportation 2035*, with the performance-based *Projections 2009* and especially with the Bay Area's voluntary development and conservation strategy, *FOCUS*<sup>14</sup>.

*Transportation 2035* has been instrumental in introducing climate protection as a core regional transportation planning objective. The *Projections 2009* process has initiated a productive discussion with local-government officials on the impact that land-use and development has on transportation GHGs. *FOCUS* has provided mechanisms, priority development areas (PDAs) and priority conservation areas (PCAs), through which the regional agencies and local governments can partner on achieving a land-use pattern that contributes to lower VMT and hence fewer GHG emissions. The PDAs also provide laboratories through which many of the assumptions underlying our models can be tested.

To enable the region to prepare a genuinely effective SCS in association with the 2013 RTP, the cooperative policy discussions begun with the 2009 RTP and with *Projections 2009* need to continue and accelerate over the next few years and into the formal beginning of the SCS process. A successful SCS will not be proposed and imposed by the regional agencies, but will be built and owned cooperatively at all levels by all the transportation and land-use authorities in the Bay Area.

We also need to make substantial progress on the implementation of the *FOCUS* PDAs and PCAs, so that local governments have concrete examples upon which to draw when constructing local plans that are consistent with the SCS. And we need to establish trust among local governments that substantial regional and state assistance to PDAs and PCAs is truly forthcoming. Full local-government participation in the PDA and PCA initiatives is conditioned on the provision of incentive funding. In *Transportation 2035* MTC established a \$2.2-billion<sup>15</sup> Transportation for Livable Communities (TLC) account to, in part, assist PDAs and transit-oriented development. Early programming of dollars in the TLC account can set a positive stage for an SCS that enjoys local-government support and, therefore, is more likely to be realistically attainable.

In addition to incentives to facilitate supportive development, local governments and other local partners (such as CMAs and transit agencies) will require resources to participate fully and effectively in the process of developing the SCS and to undertake associated planning activities (e.g., specific plans for potential *FOCUS* PDA areas). The regional agencies have sponsored and advocated for SB 406 (DeSaulnier). If passed by the State Legislature and signed by the Governor, this will enable a small vehicle-license surcharge which will provide funds to regional agencies and local governments to undertake work on the SCS and related plans. With or without SB 406, the regional agencies are committed to advocating for and securing appropriate planning resources for their partners

If we are successful in enlisting local governments and other local agencies as genuine partners in the construction of the SCS, then we should also be able to enlist those partners in some positive expression of their participation in the process and their comprehension of the results. While under the law, the SCS can only be adopted formally by ABAG and MTC, explicit council

<sup>&</sup>lt;sup>14</sup> http://www.bayareavision.org/initiatives/index.html

<sup>&</sup>lt;sup>15</sup> As a federal requirement, enumerated in escalated dollars of the day.

or board resolutions that acknowledge local implications would be highly appropriate and collectively would constitute one indicator of realism. The resolutions, similar to those required for the designation of PDAs, will need to be crafted in such a way as to not prejudge future localplan and zoning amendments. However, they should occur in the context of local governments fully understanding their contribution to the realism tests applied by federal reviewing agencies.

### Policy 3

Ж

The Bay Area regional agencies are committed to achieving the region's GHG-reduction targets through the SCS and will prepare an APS only as a last resort.

To assist in the preparation of a realistic and attainable SCS, the regional agencies will:

- Partner with CMAs, transit agencies, local governments, and other relevant stakeholders to cooperatively prepare an SCS, beginning no later than the end of 2009;
- In balance with other programming priorities, begin programming and allocating funds from the current RTP's \$2.2 billion TLC account no later than fiscal year 2010-11 so as to demonstrate a tangible commitment to priority development areas that assist in reducing GHGs;
- Initiate joint programming of regional-agency funding (e.g., MTC and BAAQMD grants) to achieve synergies and maximize combined impact, beginning with pilot efforts built upon the MTC's new Climate Change fund and the Air District's TFCA program;
- Consistent with the current RTP and forthcoming discussions on new incentives for priority development areas, give priority consideration to SCS-supportive incentives in the allocation and programming of new funding (e.g., the federal stimulus package) as it becomes available to the regional agencies;
- Advocate for early and appropriately directed incentives for PDAs and PCAs from existing state programs which are intended to encourage infill development and land conservation, and advocate for the creation of additional incentive mechanisms through new state legislation in advance of the SCS;
- Advocate for the restoration of more stable funding to transit operations, which will be essential to reducing VMT and GHGs;
- Continue to seek planning resources so that our local-government and CMA partners can share leadership roles with the regional agencies in the SCS process and undertake related planning activities;
- Advocate for regional transportation pricing authorities that can contribute to reducing VMT *per capita* and related GHGs so that these authorities can be available to the SCS if required.

As a tangible demonstration of partnership and to assist reviewing agencies in assessing the realism of the SCS, the regional agencies will seek council or board resolutions from our local partners affirming that they understand the implications for their jurisdictions in the context of the realism criteria that will be applied to the RTP and SCS.

### Policy Subject 4: Achieving Consistency with Adjacent Regions

As referenced previously, the SCS will be required to identify areas within the region sufficient to house all the population of the region, including all economic segments of the population, taking into account net migration into the region, natural increase, household formation, and employment growth.

This is a substantial departure from present regional-planning practice, which has assumed some spillover of Bay-Area-generated housing and transportation demand into adjacent regions, particularly into the Central Valley. We can plan to accommodate all our population growth, but our plans are unlikely to be realized if they are not consistent with those of our neighboring regions, which may continue to plan on the basis of accommodating exogenous demand from the Bay Area. Early and frequent discussions with surrounding regions to coordinate assumptions, policies and targets are, therefore, required.

### Policy 4:

The Bay Area regional agencies will initiate discussions and consult with our neighboring regions throughout the model-development and SCS planning processes to facilitate consistency in assumptions and policies.

## Policy Subject 5: Synchronizing and Conforming the SCS and the RTP with the Regional Housing Needs Allocation (RHNA)

SB 375 requires that the RHNA/housing element cycle will be synchronized and coordinated with the preparation of every other RTP update, starting with the first update after 2010 (i.e., 2013). RTP updates occur every four years, and housing elements must be adopted by local governments eighteen months after the adoption of the RTP. With a few exceptions, the region will now be on an eight-year RHNA cycle and local governments will be on eight-year housing-element cycles. In addition to synchronizing with the preparation of the RTP and the SCS contained therein, the RHNA allocation must be consistent with the development pattern included in the SCS, and the resolution approving the RHNA shall demonstrate that it is consistent with the SCS. Housing elements and associated local zoning adopted pursuant to the RHNA may be among the most important means for making the SCS real. SB 375 requires that local governments enact implementing zoning within three years of the adoption of their housing elements.

The 2008 ABAG RHNA process was the first in the state to explicitly connect the regional housing allocation to the sort of focused-growth and transit-oriented development principles which are likely to be central to the SCS. We, therefore, have a head start on the consistency requirements of SB 375. However, many of jurisdictions that received higher RHNA numbers as the result of the newly applied principles also persuasively argued that they required additional resources to respond to the infrastructure and service requirements of more housing and population. A more intimate connection with the RTP will be required to assist resources to flow in the same direction as housing requirements, noting that those resources must respond not just to an eight-year RHNA but to a 25-year identification of housing growth areas.

Existing law makes MTC responsible for the RTP and ABAG responsible for the RHNA. SB 375 makes both agencies jointly responsible for the SCS, though the SCS will also be adopted as

Policies for the Bay Area's Implementation of Senate Bill 375

part of the RTP. To ensure coordination and complementariness and to ensure that both agencies are fully cognizant of their commitments to each other and of their joint commitments to other partners and the region, all three instruments—the RTP, the RHNA and the SCS—should be developed and adopted together as a regional-agency partnership.

The structure of the SCS, itself, should also facilitate coordination. The fundamental expression of the Sustainable Communities Strategy will be a "vision" of the region we hope to become at the end of the twenty-five year planning period. While responding to the core housing and greenhouse-gas objectives of SB 375, the vision will also need to accommodate many other local and regional aspirations generally categorized under the three sustainability "e"s of economy, environment and equity. All policies, measures, and allocations contained in the SCS, the RTP, the RHNA will need to be at least consistent with the vision and ideally will contribute to its realization.

To maximize the ability of the vision to drive coordination, it should be confirmed early in the SCS process. All consequential long-term *and* short-term decisions directed at both the 2020 and 2035 target years, as well as at the 2040 RTP and housing horizon, can then be tested against this long-term vision. Fortunately the vision need not be constructed from scratch; it can build upon a rich legacy of cooperative regional planning that has occurred continuously for most of the past decade and most recently through the *FOCUS* program.

SB 375 requires nominal consistency among the SCS, RTP and RHNA documents. Genuine consistency on the ground necessitates that we go beyond the law and that we do cooperative follow-up after the adoption of the various documents. Under the law, RHNA housing numbers are still only distributed at the jurisdictional level. As jurisdictional control totals, these jurisdictional distributions are nominally consistent with the SCS. However, to be effective in reducing GHGs, it is essential that actual housing development be distributed to particular sub-jurisdictional locations as identified by the SCS (e.g., in PDAs, near transit stations, employment centers and other activity nodes; and with regard to sub-regional commute sheds as defined by centers and corridors). The regional agencies should use their investments and other programs to assist local governments in ensuring that housing law and with RHNA control totals, but are also consistent with the detailed SCS growth distribution.

### Policy 5:

The SCS, RTP and RHNA will be developed together through a single and integrated crossagency work program, developed and implemented in partnership with the other regional agencies, congestion management agencies, local governments, and non-governmental organizations which have a stake in the work and its outcomes.

All products in the cross-agency work program will be reported in draft to the JPC for a thorough interagency vetting before being referred with JPC recommendations, for final decision by the committees, board, and commission formally responsible for each of the three policy instruments: MTC for the RTP, ABAG for the RHNA, and both for the SCS.

The JPC and its member agencies will share draft material with partnership groups, consultative committees and advisory councils and with one another to facilitate broadened vetting of significant ideas and initiatives.

Policy 5 (continued):

From time to time, the JPC may initiate special task forces, widely representative of affected regional and local interests, to assist in the detailed drafting of contentious and consequential policies and measures.

To the extent feasible, policy reports and adopting resolutions for each of policy instruments will reference implications for the other instruments so that all decisions are cognizant of interdependencies.

The process will begin with the construction and confirmation of a twenty-five-year vision for the Bay Area. That vision will respond to the 2035 GHG target and to the 25-year housing growth objective mandated by SB 375 as well as to other desired economic, environment, and equity qualities. All long-term and short-term strategic policies, measures, and allocations will be assessed against this long-term vision.

After the adoption of the SCS, RTP, and RHNA, the regional agencies will, within the limits of their resources and authorities, assist local governments in achieving housing elements, implementation zoning, and housing projects which, in addition to fully complying with state housing-element law, are consistent with the detailed growth distribution in the SCS. Assistance will include, but not be limited to, resolving infrastructure and service issues related to the provision of housing.

Policy Subject 6: Providing CEQA Assistance

SB 375 provides various levels of CEQA assistance to housing and mixed-use development projects based on their conformity with a number of criteria, including consistency with an SCS or APS. However, the legislation only vaguely defines "consistency" and then in manner which may not be compatible with current Bay Area regional land-use planning practice. One approach to clarifying "consistency" is the preparation of a programmatic environmental impact review (EIR) for the SCS (and for the APS, if required). Development projects, as well as infrastructure projects, might also be able to "tier off" this EIR, and thus become eligible for additional CEQA assistance in addition to that provided through SB 375. The feasibility of this approach, and of alternatives, requires the resolution of a number of technical and legal issues, including the relationship to the EIR presently prepared for the RTP. Work to resolve these issues needs to occur as soon as possible as it will clearly affect the manner in which we prepare the SCS/APS.

### Policy 6:

In consultation with appropriate CEQA authorities, the regional agencies will develop and finalize, no later than June 2010, a functional design for the structure and content of the SCS, the APS and associated environmental impact review documents sufficient for these to be confidently employed as the basis for determining eligibility for CEQA assistance as contemplated in SB 375 and, if feasible, to provide additional CEQA assistance for projects which contribute positively to environmental objectives for the region.

### Policy Subject 7: Aligning Regional Policies

While ABAG and MTC develop the region's first SCS, the Air District and BCDC will also be putting together policies and regulations that will affect the region's distribution of land uses and the placement of public infrastructure. Both agencies may, as well, propose projects which could be included in the RTP.

In its effort to control criteria pollutants (e.g. ozone precursors and particulate matter), the Air District may, under existing authority, consider an indirect source rule (ISR) that regulates the construction and long-term transportation impacts of land development and requires mitigation or payments in lieu for development which does not meet established standards. Of particular concern is development which is deemed to increase automobile travel and hence vehicle emissions. The Air District may also seek to limit development in certain areas so as to reduce exposure to noxious particulate matter and other localized air toxins. Many of these areas overlap with *FOCUS* PDAs.

BCDC will be preparing an adaptation plan to prepare for inevitable sea-level rise and storm surges affecting areas on and near the Bay shoreline. This will have implications for the location of future development and perhaps for the relocation of present development and infrastructure.

It is essential that both the Air District's work and BCDC's be aligned with the SCS so that the regional agencies complement and do not contradict one another. Confusion will not contribute to the multi-level collaboration required to achieve a sustainable communities strategy that works.

### Policy 7:

Starting immediately, and consistent with the JPC's role as defined in state law, all *significant* regional-agency policy documents affecting the location and intensity of development or the location and capacity of transportation infrastructure will be vetted through the JPC and evaluated against the filter of the emerging SCS.

As with all regional-agency policies affecting local land-use discretion or local-level transportation investments, the policy documents will be developed in partnership with the applicable local governments, congestion management and transit agencies and with the participation of other interested stakeholders.

The final decision on any regional policy will continue to rest with the responsible regional board or commission to which the JPC is advisory.

## **€EPA**

EPA420-R-01-001 January 2001

## EPA Guidance:

## Improving Air Quality Through Land Use Activities

Transportation and Regional Programs Division Office of Transportation and Air Quality U.S. Environmental Protection Agency

### CHAPTER 8 INCLUDING LAND USE POLICIES OR PROJECTS IN THE CONFORMITY DETERMINATION WITHOUT HAVING THEM IN A SIP

### 8.1 WHAT IS A CONFORMITY DETERMINATION?

A conformity determination is a finding made by the metropolitan planning organization (MPO) or the state department of transportation and then subsequently by the U.S. DOT (FHWA/FTA) on the transportation plan, TIP, and projects in nonattainment and maintenance areas. The purpose of a conformity determination is to ensure that future transportation activities will not:

- Create a new air quality violation;
- Increase the frequency or severity of an existing air quality violation; or
- Delay timely attainment.

Transportation plans, TIPs, and projects in nonattainment and maintenance areas that are funded or approved by the FHWA and FTA must be found in conformity with the SIP in accordance with the requirements of the transportation conformity rule (40 CFR parts 51 and 93). (See section 3.5 for an explanation of plans and TIPs.)

### 8.2 How is conformity demonstrated?

Conformity on plans, TIPs, and projects is demonstrated when the criteria and procedures established in the transportation conformity rule are satisfied. The transportation conformity rule requires a regional emissions analysis be conducted for all non-exempt projects included in the transportation plan and TIP. In the regional emissions analysis, the emissions from future transportation activities are estimated or modeled, just as they are when creating or revising a SIP's motor vehicle emission budget(s). These estimated emissions are compared to one of the following:

- If an area has a SIP that establishes a motor vehicle emissions budget(s), the estimated emissions produced by transportation activities must be shown to be less than or equal to the budget(s).
- When budgets aren't available, the estimated emissions are compared to either emissions from the "no-build" scenario, and/or emissions from a prior year (the specific requirements depend on the pollutant and the area's classification).

In CO and PM-10 nonattainment and maintenance areas, project level hot-spot analysis of localized air quality impacts are required before the project can be funded or approved by FHWA and FTA.

## 8.3 DOES THIS GUIDANCE IMPOSE NEW REQUIREMENTS FOR INCLUDING LAND USE ACTIVITIES IN A CONFORMITY DETERMINATION?

No, there are no new conformity requirements created by this guidance. The intent of this chapter is to generally capture how land use activities are currently being included within conformity determinations. Areas should use this guidance as a reference as new land use activities are introduced and existing land use activities are being implemented. The interagency consultation process should be used to ensure that this guidance is followed for new conformity determinations.

### 8.4 IF I HAVE INCLUDED A LAND USE ACTIVITY IN A SIP, DOES IT HAVE TO BE INCLUDED IN THE CONFORMITY DETERMINATION?

Yes. Any land use activity that was included in the SIP with associated air quality benefits should also be accounted for in subsequent conformity determinations, to the extent that it is being implemented according to the schedule in the SIP or still scheduled to occur.

## 8.5 CAN I ACCOUNT FOR THE EMISSIONS BENEFITS OF LAND USE ACTIVITIES IN A CONFORMITY DETERMINATION WITHOUT HAVING THEM IN A SIP?

Yes. Land use activities do not have to be included in a SIP. You can account for the emission reductions of a land use activity in a conformity determination, without having included it in any way in a SIP (see section 93.122(b)(1) of the transportation conformity rule). Section 8.16 of this chapter discusses the advantages of doing so.

### 8.6 How are land use activities included in the conformity determination?

Note that this section, as well as sections 8.7 and 8.8, applies to areas that use network-based travel models for their conformity determinations. See section 8.15 if your area does not use a network model.

Land use activities can be included in a conformity determination either as **land use assumptions** or **control strategies**, depending on the case. Both land use assumptions and land use control strategies can affect the location of population and employment; their effects on population and employment should be integrated together before running the transportation model for the regional analysis.<sup>34</sup>

- Land use assumptions: The regional emissions analysis includes land use assumptions. These land use assumptions are made in the same way as those in the initial forecast of the SIP, discussed in chapter 6. Land use assumptions have to be reasonable, based on the best available information, and be consistent with the planned transportation system, pursuant to sections 93.110 and 93.122 of the conformity rule.
- **Control strategies:** The regional emissions analysis also includes the effects of adopted "control strategies." Control strategies are specific strategies for reducing emissions. Control strategies that are included in the conformity determination must meet certain requirements, discussed below.

<sup>&</sup>lt;sup>34</sup> The conformity rule states that serious, severe, and extreme ozone nonattainment areas and serious CO nonattainment areas with an urbanized area population over 200,000 must use a travel demand model for their regional emissions analysis. In addition, any area already using a travel demand model must also use it for conformity. Areas without network-based travel models use other appropriate methods for estimating VMT.

Regardless of whether land use activities are considered land use assumptions or control strategies, there needs to be some type of assurance that they will occur before you include them in the conformity determination, and you can only include them to the extent that they are being implemented. The type of assurance that is necessary is discussed in the rest of this chapter.

## 8.7 WHAT ARE THE TRANSPORTATION CONFORMITY RULE'S REQUIREMENTS FOR LAND USE ASSUMPTIONS?

Some of the land use activities highlighted in this guidance could fall into the category of land use assumptions. Land use assumptions are the assumptions about where future population and employment will be located within a region. According to the conformity rule, assumptions must be:

**Reasonable:** Areas have to make reasonable assumptions regarding the distribution of employment and residences in the area (40 CFR 93.122(b)(1)(iii)). EPA and DOT believe that historical trends and recent data should be considered primary sources of information from which land use assumptions should be based and evaluated.

ILLUSTRATION: IS THERE A REASONABLE EXPLANATION FOR THE ASSUMED LAND USE CHANGE? In Chicago, land use forecasting is done by the Northeastern Illinois Planning Commission (NIPC), who give forecasts to the Chicago MPO and air quality planning agency for the State of Illinois. Chicago's most recent SIP and transportation plan conformity determination included assumptions that "the past trends of decentralized land use would be moderated" -- that is, there would be increased infill in the central part of Chicago. NIPC made these assumptions based on their judgement that the actions already underway and actions likely to be implemented would contribute to substantial reinvestment in existing communities and increased redevelopment would continue to occur. Though these assumptions were somewhat different from previous assumptions, NIPC provided adequate explanation and documentation for the change. In addition, the current land use plan generally supported this type of development and a substantial amount of infill development was already underway. Both EPA and DOT believed the assumptions to be reasonable, so they were included in the regional emissions analysis for the conformity determination. (Hypothetical example) The local governments of an area are currently discussing whether they want to establish an urban growth boundary. Many of the local governments are willing to adopt it for a variety of reasons, such as saving farmland and natural areas. However, some of the local governments are opposed because they do not want to limit additional growth. The MPO includes the boundary in the area's conformity analysis with a commitment to its implementation in the documentation for the conformity determination. However, the MPO's commitment isn't sufficient for the assumption to be considered reasonable, because ultimately the MPO does not have authority over land use and cannot implement the boundary. The urban growth boundary hasn't been adopted by all of the local governments; therefore, it cannot be included as a complete boundary in the conformity determination. It could only be applied in the specific geographic areas that adopted it.

"Best and latest available:" Areas need to use the best, most up to date information they have about future land use assumptions. The conformity rule states "land use, population, employment, and other networkbased travel model assumptions must be based on the best available information" (40 CFR 93.122(b)(1)(ii)). Conformity determinations "must be based upon the most recent planning assumptions in force at the time of the conformity determination" (40 CFR 93.110(a)). Estimates of current and future population and employment are developed by the MPO or other agencies authorized to make such estimates, and approved by the MPO (40 CFR 93.110(b)).

### ILLUSTRATION: ARE THE ASSUMPTIONS THE BEST AVAILABLE?

A rapidly growing area has had a population growth rate of between 2.5 and 4% per year over the last ten years, and a corresponding increase in the number of jobs. The urbanized area has increased 80% over this same period. The MPO assumes that land will be consumed more slowly in the future, and forecasts that the land consumption rate for the next ten years will only be half of what it was, reasoning that the current building boom won't last forever.

This change in future land consumption rate would not be the best available assumption. Unless there were some compelling evidence for assuming that land consumption will drop (e.g., the area has adopted an urban growth boundary), the best available assumptions would be based on the most recent trends. In the situation described here, there is insufficient evidence to support an assumption that the current trends won't continue.

**Consistent with planned transportation system:** The conformity rule also states that scenarios of land development and use must be consistent with the future transportation system planned. The distribution of employment and residences throughout the area must be reasonable given the transportation network planned (40 CFR 93.122(b)(1)(iii)).

### ILLUSTRATION: IS THE FORECASTED LAND USE CONSISTENT WITH PLANNED TRANSPORTATION?

An area plans to build a new highway beltway. They forecast additional population and employment to locate around the beltway after it is completed. These assumptions are consistent with the transportation system planned.

- An area plans to build a new transit line with a series of new transit stops. They forecast increased population and employment around the transit stops. These assumptions would be consistent with the new transportation project planned, particularly if other actions, such as policies to facilitate transitoriented development, are adopted to encourage development around transit.
  - In the example above, the transit stops will not be completed for 10 years, but the MPO forecasts increased population and employment around the transit stops in five years. These assumptions could not be used because they are inconsistent with the planned transportation system, unless there were other adopted policies to encourage development in these areas before the transit stops are built.

### 8.8 How are the land use assumptions in a conformity determination reviewed?

The interagency consultation process should be used to evaluate and choose the assumptions to be used in the regional emissions analysis for conformity.<sup>35</sup> Regardless of whether land use modeling or best judgment of planners is used to arrive at what future land use will be, the interagency consultation partners should agree that the assumptions are reasonable, best available, and consistent with the transportation system planned. See the above examples for determining appropriateness of assumptions.

As stated previously, land use assumptions have to be based on the latest and best available information. Keeping this requirement in mind, we would expect that land use assumptions made for a conformity determination would be generally consistent with the trends assumed in the previous conformity determination or those included in a recently submitted SIP. This expectation is a result of the fact that land use trends can change slowly. If the trends are similar to those from the previous conformity determination or a recently submitted SIP, no additional assurance about assumptions is probably necessary. The fact that the trends are similar is, in effect, assurance that the assumptions made are reasonable, and likely to occur.

However, if land use assumptions are radically different from historical trends reflected in previous assumptions, the consultation process should be used to determine why these assumptions are appropriate. The conformity determination would have to document and explain why the assumptions are appropriate. The documentation should be made available for public comment during the conformity determination process. If the conformity documentation doesn't provide a reasonable explanation, then the conformity determination will be closely scrutinized, and may not be approved.

In subsequent conformity determinations, land use assumptions should be reevaluated through the interagency consultation process. If a conformity determination's land use assumptions differ significantly from past trends, the interagency consultation parties should pay close attention to land use assumptions made in subsequent conformity determinations. Assumptions can only continue to be used to the extent they are being implemented or still on schedule as planned.

### 8.9 WHAT ARE CONTROL STRATEGIES?

A control strategy is a project, program, or activity undertaken for the purpose of reducing the amount or the concentration of emissions. For example, some cities use reformulated gasoline as a strategy for controlling motor vehicle emissions. Other examples of control strategies are retrofitting heavy duty diesel trucks to produce less emissions, increased provision of transit, and commuter choice programs. Land use activities can also be control strategies. (The term "control strategies" is not synonymous with the term "transportation control measures." See section 7.8 for more about transportation control measures.)

<sup>&</sup>lt;sup>35</sup> Interagency consultation is required by the conformity rule (40 CFR 93.105). For more information on interagency consultation, visit the FHWA document, "Transportation Conformity: A Basic Guide for State and Local Officials" at <u>http://www.fhwa.dot.gov/environment/conformity/basic\_gd.htm.</u>

### 8.10 WHAT ARE THE CONFORMITY RULE'S REQUIREMENTS FOR CONTROL STRATEGIES?

Basically, control strategies must be committed to by the appropriate jurisdiction before they can be included in the regional analysis for a conformity determination. In 40 CFR 93.122(a)(3) and (4), the rule states that:

- If the control strategy requires regulatory action to be implemented or undertaken, it can be included in a conformity determination if:
  - the regulatory action is already adopted by the enforcing jurisdiction;
  - the strategy has been included in an approved SIP; or
  - there is a written commitment to implement the strategy in the submitted SIP.
- If the control strategy is not included in the transportation plan and TIP or the SIP, and it does not need a regulatory action to be implemented, then it can be included in the conformity determination's regional emissions analysis if the conformity determination contains a written commitment to implement it from the appropriate entities.

As is the case with land use assumptions, the conformity analysis can only account for approved control strategies to the extent that they are being implemented.

## 8.11 HOW DO I DETERMINE WHETHER A LAND USE ACTIVITY IS A LAND USE ASSUMPTION OR A CONTROL STRATEGY?

We realize that it may be difficult to determine whether a land use activity is a land use assumption or a control strategy. In general, if a land use activity is adopted and implemented above and beyond what has already been included in the land use assumptions, and emissions benefits have been identified for the specific activities, it can be regarded as a control strategy. Another consideration that may help clarify whether a land use activity is a land use assumption or a control strategy is its purpose:

- Is the primary purpose of the land use activity to improve air quality? If so, it likely falls into the category of control strategy.
- Is the primary purpose of the land use activity to reduce emissions for conformity analyses? If so, it likely falls into the category of control strategy.

These questions are only intended to be guidelines. You should discuss the decision with the other participants in the interagency consultation process if you have doubt about which category fits a particular project or policy best.

Regardless of whether you call a land use activity an assumption or a control strategy, it has to be based in reality – if your land use forecast differs significantly from the past trends, there must be adequate justification for the change.

### 8.12 WHAT ARE SOME EXAMPLES OF LAND USE ACTIVITIES THAT FIT IN EACH CATEGORY?

It is not always easy to determine into which category a land use activity would fit. Either category could be appropriate, depending on the circumstances. Below are some examples to illustrate this point.

### **Examples of Land Use Assumptions:**

### **Urban Growth Boundary:**

♦ In recent years, the local governments that make up the Denver region have agreed to an urban growth boundary. Approximately 85% of the local governments have signed formal agreements to adhere to this boundary. The others have verbally agreed to comply. In this case, the combination of written and verbal agreements satisfies the requirement that the urban growth boundary is a "best available" land use assumption. Although this assumption was new, there was sufficient evidence to document that all of the local governments are implementing the boundary, and therefore we consider it an appropriate assumption to make. The consultation process will be used to review the implementation of the boundary for future conformity determinations.

### Transit Oriented Development (Hypothetical example)

An area decides to accommodate future growth along a particular corridor, currently agricultural land, and they include funding to build a light rail line and stations in their transportation plan and TIP. Through the consultation process, the area decides to concentrate higher density development around these stations. They include an explanation and appropriate documentation in the conformity determination that the local governments have agreed to the approach and have committed to a schedule for changing their zoning to make it occur on the timeline assumed in the conformity analysis. The explanation is supported with details from the local governments' economic growth and incentive plans. In this hypothetical example, the transit oriented development could be a land use planning assumption: it is based on reasonable information and the land use scenario is consistent with the planned transportation infrastructure. Because the plan to focus development was discussed and agreed to through the consultation process and documented in the conformity determination, the assumption could be included in the emissions analysis for conformity.

### **Examples of Land Use Control Strategies:**

### **Urban Growth Boundary:**

In 1973, the State of Oregon passed a planning statute that requires local governments to establish an urban growth boundary. Because of this law and its implementation, Portland's MPO can include the urban growth boundary as a control strategy in the emissions analysis done for their SIPs and conformity determinations, because the statute is in place and is being implemented.

### **Parking Requirements**

An area decides they want to set a maximum on the amount of parking that can be built for new residential or commercial development. Before the effects of the parking requirement could be included in an emissions analysis for a conformity determination, it would have to be adopted by the jurisdiction that has the power to enforce it.

### Transit Oriented Development (Hypothetical examples):

- (1) An area decides to accommodate future growth along a particular corridor, currently a low density commercial one, and the transportation plan and TIP includes the funding to build a light rail line and stations along this corridor. However, the local governments have not yet taken any actions to implement transit-oriented development along this corridor.
- (2) An area decides to accommodate future growth along a particular corridor. Currently, a light rail line already exists in this corridor but because there is low density development surrounding it, the light rail line is underutilized. However, the local governments have not yet taken any actions to implement transit-oriented development along this corridor.

In these two hypothetical examples, rather than converting undeveloped land to high density development, the area would be redeveloping an existing corridor. In these cases, we may not consider transit-oriented development to be a planning assumption. A greater amount of political will would be needed for the planned changes to take place, and therefore we would want a greater degree of commitment to ensure that the development occurs. In these types of cases, EPA would regard transit-oriented development as a control strategy that would need to be adopted by the enforcing jurisdictions — the local governments — before it could be included in an emissions analysis for a conformity determination.

### 8.13 WHAT IS "DOUBLE COUNTING?"

EPA wants to ensure that areas do not count the effects of a land use activity twice. Areas must be sure that what they are including in the conformity determination has not already been included in some other way. A particular land use activity could be included either as an assumption or as a control strategy, but not as <u>both</u> an assumption and as a control strategy since that would be counting it twice. Similarly, an area should include either the effects of a land use policy, or the effects of the individual projects that happen as a result of that policy. It should not count both the policy and its resulting projects since that would be counting the effects twice.

For example, suppose a metropolitan region adopts a policy to give incentives to developers for building infill development in downtown. The area can then include the likely results of that policy into the land use assumptions for the conformity determination, such as increased population and employment in the zones that would be affected by the policy. Once that is done, however, it would not be appropriate to add new population and employment for the individual developments that occur as a result of that policy. That would be double counting, because the new population and employment that result from the individual projects have already been accounted for in the conformity determination when the policy was included.

Likewise, if instead you have already included the effects of an enormous new development into the conformity determination, it would not be appropriate to also include the effects of the policy that caused the specific development to occur. Either the effects of one or the other should be counted, but not both.

### 8.14 WHAT IF A LAND USE ACTIVITY IS TOO SMALL TO HAVE AN IMPACT ON THE OUTCOME OF TRAVEL DEMAND MODELING?

There may be some land use activities that have an air quality benefit, but their effects are too small to be picked up by a travel demand model. In cases where it is not possible to model the effects of land use policies and projects at a regional level, the emissions reductions could be quantified in your conformity determination using an off-model technique. Forecasting procedures have been developed by some urban areas to account for travel demand changes based on micro-scale design<sup>36</sup>. However, developing or adopting such procedures may not be feasible for all urban areas. Off-model analyses could be used to estimate the travel and emissions impacts of micro-scale design, but should be evaluated and agreed upon through interagency consultation of the MPO, state and local air quality planning agencies, state and local transportation agencies, EPA, and DOT.

## 8.15 WHAT IF OUR AREA DOESN'T USE A TRAVEL DEMAND MODEL FOR TRANSPORTATION PLANNING?

There are some areas that are not required to use travel demand forecasting models. In these areas, the emission reductions associated with land use activities could be quantified in your conformity determination using another technique, consistent with 40 CFR 93.122(c), and be chosen through the interagency consultation process. However, land use assumptions must still be reasonable, based on the best available information, and consistent with planned transportation. Land use control strategies must meet the requirements outlined above.

## 8.16 WHAT ARE THE ADVANTAGES OF ACCOUNTING FOR LAND USE ACTIVITIES IN THE CONFORMITY DETERMINATION WITHOUT HAVING THEM IN THE SIP?

First, conformity determinations offer more opportunities to account for land use activities as they happen. Conformity must be redetermined at least every three years. In contrast, SIPs are generally prepared at a single time. (Revisions can be made to a SIP at a later date, and you may be required to monitor and evaluate programs and make corrections.)

Second, a conformity determination looks at the effects of the land use and transportation system many more years into the future, because it must examine the life of the transportation plan.<sup>37</sup> This is in contrast to SIPs: attainment demonstrations only look as far as the attainment date, which is at most 7 years in the future; maintenance plans require maintenance of the standards for two consecutive time periods of 10 years each. It may take more than 10 years for land use policies or projects to have an impact on travel decisions and therefore air quality; the conformity determination looks at a time frame in which you can see their effects.

Third, an MPO might prefer to have effects of land use activities in a conformity determination that haven't

<sup>&</sup>lt;sup>36</sup> For more information, refer to the DOT draft report, "Data Collection and Modeling Requirements for Assessing Transportation Impacts of Micro-Scale Design," prepared by Parson Brinkerhoff Quade & Douglas, December 1999 (DTFH61-95-C-00168).

<sup>&</sup>lt;sup>37</sup> DOT's metropolitan planning regulations require plans to have at least a 20 year planning horizon. Some areas adopt transportation plans that cover more than 20 years. The plans must be updated every three years.

been accounted for in the SIP. These reductions are then "surplus" to the SIP and could be used to offset the emission-creating effects of other projects in the transportation plan.

Finally, another advantage of including land use activities in conformity rather than in a SIP is the ease of accommodating changes in the land use activity. If the features of the land use activity produce fewer emissions than originally expected, or if the activity becomes delayed, the change would simply need to be reflected in the next conformity determination. You wouldn't have the problem of having to make up a SIP "shortfall"-- that is, you would not have to revisit your SIP to make up the emissions reductions. However, you would have to revisit and revise your transportation plan and TIP and make up the reductions from these programs unless other agreements are reached with the state air agency. You would also need to be sure that the activity is correctly reflected in the next conformity determination.

#### CHAPTER 6 INCLUDING LAND USE ACTIVITIES IN THE INITIAL FORECAST OF FUTURE EMISSIONS IN THE SIP

#### 6.1 WHAT IS THE INITIAL FORECAST OF FUTURE EMISSIONS?

All control strategy SIPs and maintenance plan SIPs must have an inventory of current emissions, and a forecast of future emissions. The initial forecast of future emissions is the level of emissions in the future target year that will result if no additional control strategies are implemented. The initial forecast includes effects of existing Federal regulations or programs that will come into effect by the forecast year (for example, Federal regulations such as new emissions standards), but does not include effects of any additional explicit control strategies that are included in the SIP to improve air quality.

The motor vehicle portion of the initial forecast is based on modeling the transportation network that will exist by the forecast year. The first step in modeling the transportation network is to make *land use assumptions* for your area. When creating land use assumptions for your area, you should make sure that you take into account the effects that "smart growth" policies and projects will have on those assumptions.

#### 6.2 WHEN IS AN INITIAL FORECAST OF FUTURE EMISSIONS MADE?

The initial forecast of future emissions is made when an area prepares a SIP for the first time, or performs a SIP revision. Therefore, if your area is not in the process of developing or revising a SIP, you would not have this option available to account for your area's land use activities. Instead, you may wish to consider accounting for your land use activities in your next conformity determination.

#### 6.3 How CAN I ACCOUNT FOR "SMART GROWTH" ACTIVITIES IN THE LAND USE ASSUMPTIONS THAT ARE MADE FOR THE SIP?

Land use assumptions – the location of households and employment – are the beginning of the air quality modeling process. Some areas employ land use models to estimate what future land use will be, while other areas use the best judgment of planners. Although it is not possible to predict exactly what will happen in terms of future land use, the land use assumptions made in the SIP must be based on the best available information and must be realistic about what will happen in the future.

EPA examines the assumptions made for the initial forecast of future emissions to ensure that they are reasonable. In particular, EPA compares the SIP's forecasting assumptions to those made in the past. Typically, if a SIP is submitted with land use assumptions that are based on past trends, EPA is likely to believe these assumptions are reasonable. However, if EPA receives a SIP with land use assumptions that are radically different from previous assumptions, EPA will closely scrutinize these assumptions and look for a justification of why the assumptions are the best available and reasonable. Therefore, when submitting a SIP which includes land use assumptions based on general land use trends, it is important for you to carefully consider the basis for your land use assumptions and ensure that they are reasonable. Additional documentation from state and local agencies may be necessary in some cases. Initial forecasts based on inappropriate assumptions may not ultimately be approved.

To determine whether or not the land use assumptions are reasonable, EPA considers the following questions:

- Are the future land use trends plausible?
- Are the land use assumptions made very different from the land use assumptions used in previous SIPs or the last conformity determination?
- If so, are there reasons for the change?
- Is the change of a reasonable magnitude?
- How realistic are the future assumptions, given what kinds of development are currently happening?
- If dramatic changes are predicted, are there legal mechanisms in place to ensure the projected assumptions will in fact occur?

#### ILLUSTRATION: THE CHICAGO AREA TRANSPORTATION PLAN

In Chicago, land use forecasting is done by the Northeastern Illinois Planning Commission (NIPC), who give forecasts to the Chicago MPO and Illinois air quality planning agency. Chicago's most recent SIP and transportation plan conformity determination included assumptions that "past trends of decentralized land use would be moderated" – that is, there would be increased infill in the central part of Chicago. NIPC made these assumptions based on their judgement that the actions already underway or likely to be implemented will contribute to substantial reinvestment in existing communities and increased redevelopment will continue to occur.

NIPC documented the kinds of policy tools that they expected would become widespread during the forecast period, which include policies to provide funding for infrastructure that would make infill and brownfield redevelopment more feasible; increased focus at the state and federal levels on funding efforts to promote economic development in older communities; tax credits for rehabilitation of older and historic buildings; and priority funding to maintain the existing transportation system. NIPC also gathered information about local government policies, and included the impacts of these policies in the forecasts.

Using expert judgement, NIPC concluded that

"actions already underway or likely to be implemented will contribute to (1) substantial investment within existing communities, (2) increased redevelopment in communities which have experienced disinvestment, and (3) high standards of new development in areas where it can be accomplished in a cost-effective manner."

These land use assumptions were used to prepare the region's SIP. When the documentation on the planning assumptions was submitted to EPA Region 5, the region evaluated the assumptions, and determined the assumptions to be reasonable. The basis of this finding was that, although the assumptions were different from past trends, sufficient supporting evidence, including the current implementation of policies and the level of infill development already underway, indicated that a new trend was beginning and state and local policy and planning goals could realistically lead to the population, housing, and employment assumptions made in the plan.

In contrast to the discussion above, which is relevant to general land use trends, EPA believes that specific policies and projects should be included in an initial forecast of future emissions of a SIP under certain conditions, described below.

EPA believes that it would be appropriate to include a *specific land use policy* in the land use assumptions made for the initial forecast only if:

- A. The policy meets one of the following conditions:
  - it has already been adopted by an appropriate jurisdiction, or
  - the policy is planned and there is an enforcing mechanism to ensure it will happen;

-and-

B. The effects of the policy haven't already been accounted for in the land use assumptions – that is, you are not double counting (this point is discussed further in section 6.5).

For example, suppose an area has passed a planning statute that requires local governments to establish an urban growth boundary. Because this is an adopted law, the effects of the urban growth boundary could be included in the initial forecast of future emissions. However, if an area is currently discussing whether to adopt an urban growth boundary, or one has been proposed but it is not yet adopted by an enforcing agency, it would not be appropriate to include its effects in the initial forecast. The urban growth boundary should be adopted before it is included.

#### ILLUSTRATION: THE MARYLAND SMART GROWTH POLICIES

In 1998, the Governor of Maryland signed an executive order establishing the Smart Growth and Neighborhood Conservation Policy, which implements the 1997 Smart Growth Areas Act. The cornerstone of this Act is the designation of "priority funding areas," or PFAs. These PFAs are areas where state and local governments have agreed that future growth and development should occur. The Act prohibits state agencies from funding or supporting infrastructure, economic development, housing and other programmatic investments outside of these designated areas. Other components direct state agencies to a) give priority to central business districts, downtown cores, and empowerment zones when funding infrastructure projects or locating new facilities; b) locate workshops, conferences and other meetings in these zones; and c) work with rural local governments to retain the rural character of their communities.

Maryland has four other complementary policies and programs. The Voluntary Clean Up and Brownfields program limits liability for developers of brownfield sites; The Live Near Your Work program, which provides home buyers with a minimum of \$3,000 towards the home buying cost; the Job Creation Tax credits, which provides income tax credits to businesses that provide a minimum of 25 jobs within PFAs; and the Rural Legacy Areas program, which aims to preserve agricultural, forest and natural resource lands and protect them from development. The purpose of these incentives and programs is to complement the regulatory PFA policy by encouraging developers, employers, and home buyers to locate within the PFAs.

These policies are adopted at the State level, and State and local governments have worked together to designate PFAs. Therefore, it would be reasonable for Maryland to estimate the impacts of the PFA policy and the complementary incentive programs on the location of future population and employment and fold them into the land use assumptions in their initial forecast of future emissions.

EPA believes that it would be appropriate to include a *specific land use project* in the initial forecast of future emissions over and above the general assumptions only if:

A. The project meets one of the following conditions:

- it is already built,
- it is currently under construction, or
- it is planned, local zoning necessary for the project is already in place, and there is an enforceable mechanism to ensure that it will actually occur;

#### -and-

B. The effects of the project haven't already been accounted for in the general land use assumptions – that is, you're not double counting.

For example, suppose a large brownfield site near a transit line is currently being redeveloped as a mixed use, transit-oriented development that is designed to house and employ thousands of people. If the new population and new employment haven't already been accounted for, then this project can be included in the initial forecast of future emissions.

#### ILLUSTRATION: WASHINGTON'S LANDING, PITTSBURGH, PENNSYLVANIA

Washington's Landing is a brownfield revitalization project in Pittsburgh, PA. The redevelopment project is located on an island in the Allegheny River on a site that was once a stockyard and slaughterhouse. A two year environmental clean-up effort was required. The developer, Montgomery and Rust, its builder/ partner, the Rubinoff Company, and Pittsburgh's Urban Redevelopment Authority worked together to turn this underutilized site into a thriving community with townhomes close to downtown, a walk/bike path and a public park.

The development is primarily built, with 65 townhomes already sold and plans to build 23 more. As long as the population and housing growth has not been assumed already in some other way in the initial forecast of future emissions, the State of Pennsylvania could account for the emissions reduction impact of locating new growth in this infill/ brownfield location in their land use assumptions.

#### 6.4 WHAT IS "DOUBLE COUNTING?"

EPA wants to ensure that effects of land use activities are not counted twice. Areas must be sure that what they are including in the initial forecast has not already been included in some other way. An area should include either the effects of a land use policy, or the effects of individual projects that happen as a result of that policy, but shouldn't count the effects twice.

For example, suppose a metropolitan region adopts a policy to give incentives to developers for building infill development downtown. Forecasts could be made on the amount and location of population and employment in the zones that would be affected by the policy. The state could then account for the impact of this policy in the land use assumptions for the SIP. However, once that is done, it would not be appropriate to also assume that new population and employment would occur for the individual developments that occur as a result of that policy. That would be doubling counting, because the new population and employment that result from the individual projects would have already been accounted for when the policy was included in the initial forecast of future emissions.

Likewise, if you have already accounted for the impacts of a large-scale new infill development on population and employment in the land use assumptions, it would not be appropriate to also account for the impacts of the infill incentive policy that caused the specific development to occur. Either the effects of the development or the effects of the policy should be counted, but not both.

#### 6.5 WHAT ELSE SHOULD I CONSIDER WHEN INCLUDING LAND USE ACTIVITIES IN MY INITIAL FORECAST OF FUTURE EMISSIONS?

This option allows you to account for all of the smart growth policies, programs and projects that you are already doing. The composite impact of these smart growth activities may reduce your forecasted emissions level in the future, thereby reducing the amount of additional emissions reductions needed from control strategies.

Also, by associating air quality benefits with your smart growth programs on air quality, this analysis may be useful in your efforts to promote these programs more broadly. However, since this analysis is designed to set a baseline level of emissions, specific impacts of individual activities are not reflected in this analysis. States may want to demonstrate specific reductions associated with certain activities, and may wish to compute these impacts separately.

Also, because of the nature of the travel demand forecasting process, the effects of microscale design features are not well represented in this modeling process. Adjustments to the regional scale travel demand forecasting process may be necessary to capture the effects of microscale activities. This topic is discussed in greater detail in chapter 10.

Finally, it is important to note that inclusion of land use policies, programs and projects that differ greatly from past trends will be scrutinized for reasonableness, and may not be accepted as land use assumptions without additional justification (e.g., adopted commitments by implementing parties in place). Therefore, it is to your benefit that your analysis include support for your assumptions about the effects your land use policies and programs will have on future development patterns.

# MTC Presentation May 25, 2010 What Would It Take to Achieve the Best Alternative? (1 of 2)

1 6

# Increase auto operating costs

**three-fold** Carbon tax that increases cost of gas by 20% 25-cents per mile congestion charge Charged parking increases by \$1.00 per hour

# Aggressive Land Use Policies – increase projected urban population growth and decrease projected suburban/rural population growth

San Francisco/San Mateo – Add 270,000
 people beyond projections Sonoma/Solano –
 Reduce projected growth by 160,000 people

# What's Working Against Us?(2 of 2)

5 - S

State Funding Crisis: Local
Government; Transit; Redevelopment
PDA Challenges: aging infrastructure (capacity, replacement, financing);
infill parcel sizes are too small (predevelopment costs too high for small scale infill (risk versus reward ratio) and risk conversion of larger parcel industrial land for housing);
social issues in some communities (schools, security, services, air quality, healthy food, amenities)

# MTC Presentation MTC Planning Committee July 9, 2010 (1 of 2)

#### 3 New Bay Area Sensitivity Tests (for 2035)

**\*TDM** – assumes additional 5% of workers with incomes above \$75,000/yr telecommute daily (compares to 5% of all Bay Area workers that currently work at home)

\***Pricing** – consolidates previously assumed VMT, congestion and carbon tax charge in "Most Ambitious" pricing scenario into single VMT charge of \$0.50 per mile (compares to Express Lanes that charge \$0.10 - \$0.50 per mile)

\*Land Use – takes "Most Ambitious" land use scenario and:

- 1. moves all 2035 forecasted new in-commute growth into Bay Area (approx. 115,000 new households)
- Increases forecasted population growth in 3 largest cities by an additional: 200,000 in SF (previous); 54,000 in SJ; and 49,000 in Oakland
- 3. Additional population growth in several other "job-rich" PDAs

# What if We Don't Meet GHG Targets? (2 of 2)

- If SCS doesn't achieve GHG targets, an Alternative Planning Strategy (APS) must be adopted that demonstrates target achievement
- ARB must accept or reject local determination that SCS/APS achieves targets
- CEQA streamlining possible with SCS or APS



22



METROPOLITAN TRANSPORTATION COMMISSION Joseph P. Bort MetroCenter 101 Eighth Street Oakland, CA 94607-4700 TEL 510.817.5700 TDD/TTY 510.817.5769 FAX 510.817.5848 E-MAIL info@mtc.ca.gov WEB www.mtc.ca.gov

#### Memorandum

TO: <u>Regional Targets Advisory Committee</u>

FR: Steve Heminger

DATE: May 17, 2010

W. I.

RE: Senate Bill 375 Implementation: GHG Target-setting - Scenario Testing

#### **INTRODUCTION**

MTC has traditionally evaluated several scenario assessments as part of its RTP process. The evaluations typically range from constrained project, land use and pricing assumptions to totally unconstrained and admittedly unachievable alternatives. The purpose of these diverse scenarios have been to test a broad range of options and what there impacts are on various measures, including GHG emissions (our RTPs have been measuring GHG emissions since the early 1990s).

#### **2009 RTP EVALUATION**

#### Background

MTC adopted its 2009 RTP, known as Transportation 2035 (or T2035), in April 2009. T2035 did not deviate from this past practice of looking at a very broad range of constrained/unconstrained transportation, land use and pricing scenarios.

The T2035 process took a two step scenario evaluation approach. First, our "Vision Analyses" evaluated financially unconstrained investment packages – HOV/Express Bus, Freeway Operations and Rail/Ferry; the second round, conducted as part of our RTP EIR process, looked at several financially constrained options. Our analyses consistently have found that infrastructure by itself does not do much for reducing GHG emissions. What makes more of a difference is when these infrastructure improvements can be combined with options that price the private automobile and provide more dense and mixed use land use patterns in urban areas that are well served by transit and are conducive to walking and biking. This was true for both our Vision and RTP EIR analyses for T2035.

<u>Our RTP EIR evaluation provided the basis for the range of scenarios that have been included in the MPO submittal to RTAC and CARB. Because we consistently found that infrastructure has little impact on emissions, the analyses focused mainly pricing and land use options and combinations of the two. In addition, in the financially constrained environment of the RTP, our agency has consistently prioritized a "fix it first" credo, to the extent that nearly 80% of all RTP expenditures are for maintaining and operating our existing transportation system; most of the rest of the expenditures are on transit expansion, with a smaller amount to road expansion. This heavy maintenance is attributed to the overall age of the transportation system that was mostly built 50 – 60 years ago – in addition, there is limited right of way available to expand transit or highway system – as a result, our more recent focus has been to squeeze more capacity out of the existing system through ramp metering, BRT and</u>

Alternatives Tested

other operational improvements

Given that our T2035 plan invests more than 80% of revenues into maintaining and operating or existing transportation system, there was very little variation in the transportation networks among our scenarios; most of the variation was in land use and pricing assumptions. In summary, the scenarios are defined as follows:

**Project:** The proposed Transportation 2035 Plan is financially constrained, as defined in the past four plans, and consistent with federal planning regulations. A total of \$226 billion in projected revenue is estimated to be available under the proposed Transportation 2035 Plan.

Key new projects include: buildout of our HOV lane system and conversion to Express (HOT) lanes; completion of several transit expansion projects, including BART/San Jose/Santa Clara extension, SF MTA's Central Subway to China town, BART extension to Eastern Contra Costa County; new Marin/Sonoma County rail system, ferry expansion; regionwide ramp metering; and completion of our Regional Bicycle Network

Heavy Maintenance/Climate Change Emphasis: This alternative maximizes the use of available discretionary funds for investments that (1) reduce shortfalls for transit and local roadway maintenance; (2) improve walkability, bicycling, transit access, and carpooling and ridesharing; (3) help local jurisdictions to plan and build housing near transit; and (4) implement public education and outreach programs to raise awareness and facilitate behavior changes that help the region to meet its climate protection goal. It excludes the Express Lane and transit expansion projects mentioned above in the Project alternative.

Add Land Use and Pricing Assumptions: Applies one or both of the land use and pricing assumptions to the Heavy Maintenance and Project Alternatives. Our pricing and land use scenarios include very aggressive assumptions. We increase auto operating costs nearly 5 fold – this is necessary to move the GHG emissions "needle" because the Bay Area is a relatively high-wealth region. Our land use assumptions including moving 200,000 people, over and above current projections, in 2035 to San Francisco to better match jobs with workers; alternatively, we remove a like number of people in several suburban counties that have much higher jobs/housing imbalances.

Needless to say, these pricing and land use assumptions are not considered attainable by any stretch of the imagination. Given that MTC has little control over what it can price and even less control over local land use decisions, a more likely scenario would be to provide incentives to local agencies that do implement innovative pricing strategies or take on larger shares of housing and population.

#### Alternative Assessment Results

The RTP EIR alternatives produced a range of GHG emission results as follows:

						F			
Alts/GHG emissions reductions from 2005 (% per capita )	Project	Heavy Maint.	Project + Land use	Heavy Maint + Land Use	Project + Pricing	Heavy Maint + Pricing	Project + Land use + Pricing	Heavy Maint + Land use + Pricing	
2020	-5%	-3%	-7%	-5%	-7%	-5%	-10%	-7%	
2035	-3%	-1%	-10%	-8%	-10%	-8%	-12	-9%	
		J							

As shown from the above table, there are several observations regarding GHG emissions compared to 2005 base year:

- 1. The Project performs better than the Heavy Maintenance alternative. This makes sense since most of the T2035 system expansion investments are for transit improvements; even highway expansion, which is only 4% of total RTP funding, is for expanding HOV/Express lanes, which have been shown encourage more carpooling and improve transit transit performance.
- 2. Our pricing and land use options perform about the same. Combined land use and pricing scenarios perform better than one or the other; while the two scenarios are synergistic, they are not additive.
- 3. Project assessments that we have tested in 2035 range from -3% weekday pounds per capita GHG emission reductions (2035 RTP) to -12% per capita reductions.

#### SUMMARY

Given that our maintenance and operations RTP financially constrained expenditures have and will likely continue in the 80% range, the region will likely not be able to depend on massive infrastructure improvements to support GHG emission reductions. We can expect some modest reductions as a result of strategic expansion through priced Express Lanes and select transit corridors and operational improvements that squeeze more capacity out of our existing transportation system.

Most of the GHG reductions that can be realized will result from how successful the region can be in moving toward more dense/mixed use and transit oriented development, and implementing more creative ways price the transportation system to adequately reflect the true costs of a limited resource. To these ends, we have been incentivizing local agencies over the past several years to do these things through our Transportation for Livable Communities (TLC – which offers planning assistance and capital grants for TOD totaling about \$30 million per year) program, our Blueprint program (known as Focus, which in cooperation with local agencies, identified about 120 Priority Development Areas, or PDAs, where we will focus all of our TLC funds), and various other regional programs, including our Regional Bike Network (about \$20 million/yr) and Climate Change Initiative Program (about \$40 million/yr.

However, it's difficult to measure the impacts of these programs. Given what we know today, we can achieve a 5% GHG reduction per capita in 2020 and 5% in 2035 — those are based on our adopted plan. While SB 375 does allow each MPO to submit a target for CARB to consider, for now we will continue to work closely with the other MPOs and provide CARB with as consistent and complete data as we can. This data will allow CARB to set a target that is both ambitious and achievable.

# MEMORANDUM

Data Transmittal Memo

May 18, 2010

File Number 8000130

TO: Lynn Terry, Deputy Executive Officer, California Air Resources Board

 FROM: Steve Heminger, Executive Director, Bay Area Metropolitan Transportation Commission (MTC) Hasan Ikhrata, Executive Director, Southern California Association of Governments (SCAG) Gary Gallegos, Executive Director, San Diego Association of Governments (SANDAG) Mike McKeever, Executive Director, Sacramento Area Council of Governments (SACOG)
 SUBJECT: Preliminary Report on Metropolitan Planning Organization (MPO)/Air Resources

Board (ARB) Senate Bill 375 (SB 375) Target Setting Analysis

#### Introduction

The report of the Regional Targets Advisory Committee (RTAC) recommends that the process for setting greenhouse gas (GHG) targets under SB 375 should center on collaboration among the state's MPOs and ARB with support from Caltrans and the California Transportation Commission (CTC) regarding modeling and regional transportation plan guidance. The RTAC report recommends a seven-step process for the target setting analysis with the final step being the adoption of targets by the ARB by September 30, 2010 (see Attachment 1, excerpted from RTAC report, dated September 29, 2009).

Following the completion of the RTAC report, the executive directors of the four large MPOs (MTC, SCAG, SACOG, and SANDAG) along with the executive director of the San Joaquin Council of Governments (who agreed to serve as a liaison to the executive directors of the other MPOs in the Central Valley), met to discuss the process by which the initial target setting analysis should be prepared. These executive directors decided that three working groups would be formed:

- A planning working group made up of planning directors, staff members, and consultants for the MPOs, along with key staff members from ARB and Caltrans
- A modeling working group made up of senior modeling staff members from the MPOs
- A legal working group made up of staff attorneys and consulting attorneys for the MPOs

# Table 2 - Comparison of Expenditures for Large MPOs - Existing Fiscally Constrained RTPs (Expenditures as % of Total RTP Cost)

RTP Expenditures	MTC	SCAG	SANDAG	SACOG
Road Maintenance &				
Operations	30%	10%	20%	34%
Transit Maintenance &				
Operations	51%	31%	24%	28%
Road Expansion (HOV,				
HOT, ML)	2%	20%	16%	3%
Road Expansion (General				
Purpose)	1%	5%	23%	13%
Transit Expansion	14%	18%	14%	12%
Other	2%	16%	3%	10%

Notes:

SCAG Transit Maintenance & Operations percentage includes expenditures covered by farebox revenues. In the absence of such revenues, this figure would be 23%.

SANDAG Transit Maintenance and Operations percentage includes expenditures covered by farebox revenues. In the absence of such revenues, this figure would be 18%.

SACOG Road Expansion (General Purpose) percentage excludes in-kind developer-built roadways; SACOG excludes this to be consistent with other MPO reporting.

#### 05/18/2010 3:05 PM

Region	2005 Base Year	2035 Adopted RTP (updated gas price)	'2005 Bi to ' 20	je rom ase Year" 35 RTP ad gas)"	2035 Most Ambitious (2005-2035)	Chang "2005 Bạ to "203 Ąmbit	se Year" 5 Most
	Price	Price	Price	%	Price	Price	%
MTC							
Fuel	\$0.141	\$0.189	\$0.048	34.3%	\$0.189	\$0.048	34.3%
Maintenance	\$0.065	\$0.107	\$0.042	64.9%	\$0.107	\$0.042	64.6%
VMT Fee/Carbon Tax	\$0.000	\$0.000	\$0.000	-	\$0.069	\$0.069	-
Congestion Pricing	\$0.000	\$0.000	\$0.000	-	\$0.425	\$0.425	-
Parking Pricing**	\$0.000	\$0.000	\$0.000	-	\$0.364	\$0.364	-
Other	\$0.000	\$0.000	\$0.000	-	\$0.000	\$0.000	-
Total Cost/Mile	\$0.206	\$0.297	\$0.091	44.0%	\$1.154	\$0.948	460.3%
SCAG							1
Fuel	\$0.141	\$0.188	\$0.048	33.8%	\$0.188	\$0.048	33.8%
Maintenance	\$0.065	\$0.107	\$0.042	64.6%	\$0.107	\$0.042	64.6%
VMT Fee/Carbon Tax	\$0.000	\$0.000	\$0.000		\$0.027	\$0.027	-
Congestion Pricing	\$0.000	\$0.000	\$0.000		\$0.000	\$0.000	-
Parking Pricing	\$0.000	\$0.000	\$0.000	-	\$0.000	\$0.000	-
Other	\$0.000	\$0.000	\$0.000	•	\$0.000	\$0.000	-
Total Cost/Mile	\$0.206	\$0.295	\$0.090	43.6%	\$0.322	\$0.116	56.6%
SANDAG							
Fuel	\$0.174	\$0.193	\$0.019	11.1%	\$0.193	\$0.019	11.1%
Maintenance	\$0.000	\$0.058	\$0.058	-	\$0.058	\$0.058	-
VMT Fee/Carbon Tax	\$0.000	\$0.000	\$0.000	-	\$0.080	\$0.080	
Congestion Pricing	\$0.001	\$0.002	\$0.001	100.0%	\$0.002	\$0.001	100.0%
Parking Pricing*	\$0.000	\$0.000	\$0.000	-	\$0.077	\$0.077	-
Other	\$0.000	\$0.000	\$0.000	-	\$0.000	\$0.000	-
Total Cost/Mile	\$0.175	\$0.253	\$0.078	44.8%	\$0.410	\$0.235	134.6%
SACOG							
Fuel	\$0.130	\$0.179	\$0.049	37.7%	\$0.179	\$0.049	37.7%
Maintenance	\$0.065	\$0.107	\$0.042	64.6%	\$0.107	\$0.042	64.6%
VMT Fee/Carbon Tax	\$0.000	\$0.000	\$0.000	-	\$0.030	\$0.030	-
Congestion Pricing	\$0.000	\$0.000	\$0.000	-	\$0.063	\$0.063	-
Parking Pricing	\$0.000	\$0.000	\$0.000	-	\$0.050	\$0.050	-
Other	\$0.000	\$0.000	\$0.000	-	\$0.000	\$0.000	-
Total Cost/Mile	\$0.195	\$0.286	\$0.091	46.7%		\$0.234	119.7%

Table 3 - Comparison of Pricing Assumptions for Large MPOs (expressed in Price Per Mile^ 2009\$)

Notes:

^ Costs are based on a 22 mile round trip, except SACOG numbers, which are based on a 20 mile round trip.

\* SANDAG parking pricing assumptions vary according to smart growth place type classifications.

\*\* Does not account for existing parking charges in about 15 TAZs. We are still determing if there are enough trips that pay parking compared to a regional total to warrant consideration of a weighted parking cost average The cost shown here represents an \$1/hr surcharge for all trips assumed in our scenario analyses converted to an average cost/mi based on an average RT length of 22 mi

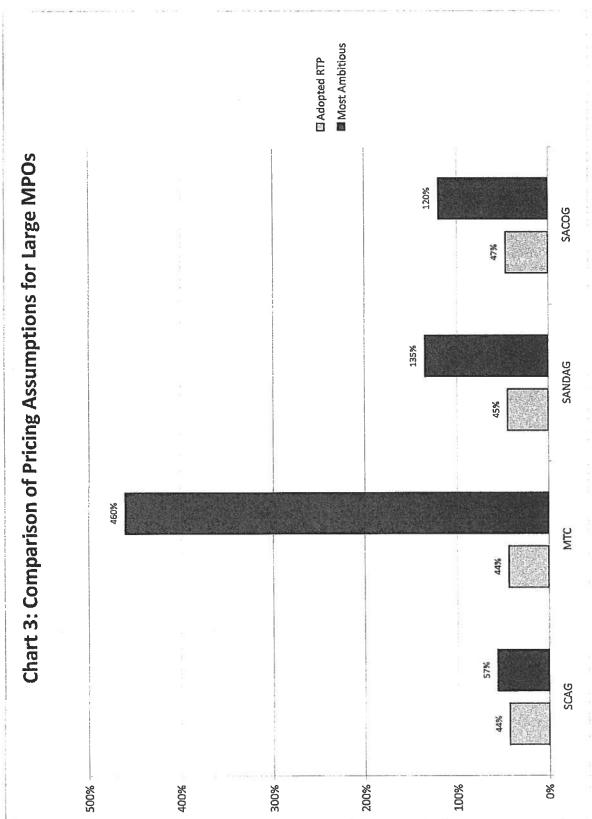
# Table 4. Land Use Scenario Comparison

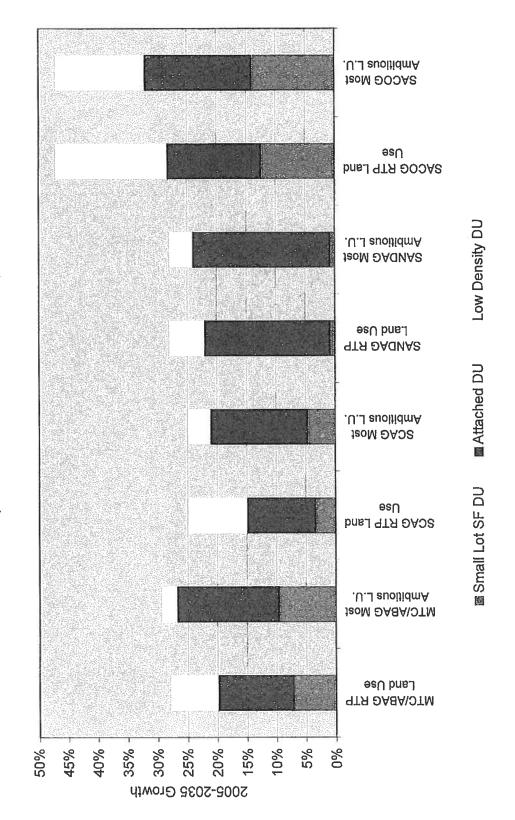
1

-

		a state and the second se	Change 2005	Change 2005 to 2035 RTP		Scenario	
		2035 Current					
	2005 Base Year Units	Plan Units- 2035	Numeric Change	Percent	2035 Horizon Year	Numeric Change	Percent
Region	(thousands)	(thousands)	(thousands)	Change /5/	(thousands)	(thousands)	Change /5/
MTC/ABAG Total Duration   Inite (thorsecode)	2 582		+721	+28%	3	+758	+29%
1044 DWENNIN ULINA (NIUUSAINAS) Attachad Di Pe (thouseande) /1/	945	1.276					
Small Lot SF DU's (thousands) /2/	522		ne sué terre esté notre mis présédent	+35%			
Attached Units Shares of Total Units	37%				42%	%69	
Small Lot SF Shares of Total Units	20%		25%		23%		a so at the fact have
Compact Growth Shares of Total Units /3/	57%						1947 - 1944 - 1947 - 19
Dwellings in Transit Priority Areas (thousands) /4/	1/00	7,264	20024		%US	116%	200020000000000000000000000000000000000
PA Share of Total Units Deviced Tobe/Housing Paris ( Inhe/Dwallings)	1.35			+14%			+13%
SCAG							
Total Dwelline Units (thousands)	6.245	667.7	+1,554				
Attached DU's (thousands) /1/	2.561			+29%	ຕ່	÷	%0*+
Small Lot SF DU's (thousands) /2/	614	820					+47%
Attached Units Shares of Total Units	41%		47%	では、正常ななない	46%	899	
Small Lot SF Shares of Total Units	10%			Contraction of the	12%		
Compact Growth Shares of Total Units /3/	51%	53%		STRUCTURE ST			
Dwellings in Transit Priority Areas (thousands) /4/	3,679		+650	+18%	4	+846	4234
TPA Share of Total Units	89%			Not an and a starting the			THE REPORT OF A DESCRIPTION OF A DESCRIP
Regional Jobs/Housing Ratio (Jobs/Dwellings) /6/	1.32	1.32	00-0+	%0+	52.1	10.0+	
SANDAG							
Total Dwelling Units (thousands)	1.108				-	112+	+25%
Attached DU's (thousands) /1/	388		+236	%19+			
Small Lot SF DU's (thousands) /2/	209			A TANK DISTRICT		0	al all where the part of the second
Attached Units Shares of Total Units	35%		200 200		204	705	
Small Lot SF Shares of Total Units	0/.D.1				61%		
Compact Growth Shares of Total Units /3/	547 I		+395	+89%			+94%
TPA Share of Total I Inte	40%	59%	-	State of the state	61%		arai (S.C. S. S. S. S. S. S. S.
Regional Jobs/Housing Ratio (Jobs/Dwellings)	1.35			-6%			%9-
SACDG							
Total Dwelling Units (thousands)	808	-					
Attached DU's (thousands) /1/	245	374	+129	+23%		+:47	29X4×T
Small Lot SF DU's (thousands) /2/	24						
Attached Units Shares of Total Units	30%	31%	34%	などのためになった。	33%	33%	
Small Lot SF Shares of Total Units	3%				1444		
Compact Growth Shares of Total Units /3/	33%						ADA A A A A A A A A A A A A A A A A A A
Dwellings in Transit Priority Areas (thousands) /4/	103		+3//	42/02+	/44.9	7044	2121233123212
TPA Share of Total Units	13%						
Regional Jobs/Housing Ratio (Jobs/Dweltings)	1.24		11.0-	α/. <b>β-</b>	51.1		

/3/ Compact growth shares = sum of attached + small lot single family unit shares.
/4/ Transit priority areas are 1/2 mile from frequent (15-minute-or-less headway) peak transit service.
/4/ Comitted from these columns are "percent" or "percent change in growth share" computations.
/5/ Comitted from these columns are "percent" or "percent change in growth share" computations.
/5/ Comitted from these columns are "percent" or "percent change in growth share" computations.
/6/ Figure from these columns are "percent" or "percent change in growth share" computations.
/6/ Figure from these columns are "percent" or "percent change in growth share" computations.
/6/ Figure from these columns are "percent" or "percent change in growth share" computations.
/6/ Figure from these columns are "percent" or "percent change in growth share" computations.
/6/ Figure from these columns are "percent" or "percent change in growth share" computations.
/6/ Result on other information. SCAG shaft helieves the 2035 jobs/housing ratio should be 1.29, not 1.32 or 1.33. SCAG shaft will be working with local jurisdictions in the next RTP update to scale down total employment by about 250,000 jobs to result in a jobs/housing ratio of 1.29.







19.78     -6.9%     -5.0%       19.62      -5.8%       18.63     -     -10.5%	1	nation + 1 and 1 se
-6,9%		
-6,9%		Project + Land Use
%6.9-	1	
%6.9-		Project + Pricing
		Project
20.54 -3.3% -1.57	- 20.13	
		LINAA + 1 and Lise
-4.9%		HMA + Pricing
19.85		
		No Project (and HMA)
20.83		
0.0%		Existing Conditions
1	20.83	
Horizon Interim Horizon	Base Interim	Alternative
	Kir Folevast ton	
Weekday CO2 Emissions by Passenger Percent Difference	Weekday CO	

HMA = Heavy Maintenance Alternative (see T2035 RTP EIR for alternative description

. . .

 $T \rightarrow 0$ 



Bay Area Business Coalition (See Distribution Below) April 24, 2012

Dear Gentlepersons:

Thank you for your April 11, 2012 letter to our respective boards regarding your questions and request for additional information about the Sustainable Communities Strategy (Plan Bay Area).

First, we would like to express our appreciation for the Business Coalition's continued participation in Plan Bay Area and the value you add to the planning process. Second, we agree that officials, stakeholders and the public should be given adequate opportunity to participate in the Plan Bay Area process and as you know we have done extensive outreach to all stakeholders since we started the process over 2 years ago.

We also appreciate the opportunity to have held discussions with the Business Coalition to address several of your Plan Bay Area-related questions. As your letter notes, we met in February 2012 to discuss several questions you had submitted about the process, housing/employment forecasts, transportation funding, and regulatory issues. At that time we committed to providing written responses to your questions. These are provided in Attachment A. We note that most of the questions attached to your April 11, 2012 letter are the same as those discussed at our February 2012 meeting. Please see Attachment B for a cross reference between our responses and your April letter.

In addition to the responses to your questions, we committed to providing additional data derived from several of our past analyses. You'll note a list of documents that contains additional information and analysis that you requested. These documents are too voluminous to print so we have posted at the address on Attachment C (see: <u>http://www.onebayarea.org/plan\_bay\_area/land\_use\_data.htm</u>). The rest is still being compiled and will be sent under separate cover.

We look forward to further collaboration with the Business Coalition on Plan Bay Area and the economic impact analysis that we discussed with you at our meeting in February.

If you have further questions on our responses or data, please do not hesitate to contact Ken Kirkey at <u>kennethk@abag.ca.gov</u> or Doug Kimsey at <u>dkimsey@mtc.ca.gov</u>.

Steve Heminger Executive Director, MTC

Planning Directo

J:\PROJECT\2013 RTP\_SCS\Correspondence\Business Coalition.doc

#### Distribution:

Jim Wunderman, Bay Area Council John Coleman, Bay Planning Coalition Paul Campos, BIA Bay Area Linda Best, Contra Costa Council

Karen Engel, East Bay EDA Gregory McConnell, Jobs & Housing Coalition Cynthia Murray, North Bay Leadership Council Rosanne Foust, SAMCEDA Sandy Person, Solano EDC

cc: Ann Flemer, MTC Doug Kimsey, MTC Ken Kirkey, ABAG

#### Attachment A

#### BAY AREA BUSINESS COALITION

Questions on Sustainable Communities Strategy

February 2012

#### Process

#### 1. What is the current status of the SCS scenario process?

The Alternative Scenarios have been evaluated and the ABAG Executive Board released the Preferred Scenario, Jobs-Housing Connection on March 15. MTC will release the Transportation Investment Strategy on April 13. ABAG and MTC will seek approval of a preferred SCS scenario on May 17, 2012.

# 2. When will the preferred scenario be identified? See above.

## 3. What body (ies) will have an opportunity to review and comment on it before it is adopted?

All stakeholders and agencies will have this opportunity. In addition, MTC and ABAG will review the recommendations with the Regional Agency Working Group (RAWG), MTC's Policy Advisory Council, Partnership Technical Advisory Committee/Board and Joint Policy Committee. Presentations will also be made to the BAAQMD (Air District) and Bay Conservation and Development Commission (BCDC). Other presentations will be made upon request, subject to scheduling.

#### 4. How will it be adopted? By what body (ies)?

MTC and ABAG will adopt the preferred SCS by resolution.

#### 5. Will it be a "draft" preferred scenario that is adopted?

In May 2012, MTC and ABAG will be adopting a final preferred SCS scenario.

6. Is there a possibility of additional scenarios being added for consideration? MTC and ABAG will adopt one preferred scenario. We will be conducting a program environmental impact report (EIR) later this year that by law requires us to evaluate alternatives to the preferred SCS scenario.

## 7. What is the process/timeline that will follow adoption of the (draft) preferred scenario?

March 15, 2012: release preferred land use scenario April 13, 2012: release transportation investment strategy

May 11, 2012: seek MTC Planning/ABAG Administrative Committee approval of draft preferred SCS scenario.

May 17, 2012: seek MTC/ABAG adoption of a final preferred SCS scenario.

June – December, 2012: develop/release draft SCS/program EIR January – April 2013: develop/adopt final SCS/program EIR

Comments on the scenario will take place in many locations around the region between May 2012 and early 2013. We are hoping that City Councils will provide comments during this period.

#### Scenario Results

8. None of the 5 alternative scenarios comes close to meeting the 2035 target of 15% per capita GHG reduction. Please explain how the agencies plan to bridge the gap.

We are still evaluating how to achieve the ARB 2035 target for the Bay Area.

9. Less than one year ago, agency staff presented an analysis of how "Current Regional Plans" performed. The analysis showed that Current Regional Plans would reduce GHG by 10% by 2035 (attached). Please explain how Current Regional Plans performed better than Core Concentration and Focused Growth despite the fact the latter had the benefit of almost \$40 billion n additional assumed transit improvements for which there is no funding.

Current Regional Plans used different regional demographic control totals; it also used an earlier version of our new travel model.

10. Please talk a little bit about modeling. Are you using the same/similar modeling tools/protocols as did SANDAG and SCAG? If not, why not? What are the critical differences?

We are using the latest generation travel model (unknown as "tour-based") that tends to be more precise in measuring types of trips than SCAG and SANDAG. It is our understanding that all the larger regional agencies are moving toward tour-based models.

ABAG is using an iterative method with local government planners to update and refine its projections. In addition, ABAG and MTC staffs are developing an UrbanSim model designed by UC Berkeley. UrbanSim is a software based system that integrates land use; transportation and economic conditions.

11. CARB recently determined that SANDAG's SCS will meet the region's GHG targets. In doing so, CARB concurred with SANDAG's projection that implementing a suite of policies such as smart driving education campaigns, telecommuting, and vanpool incentives, would account for 40% of the region's per capita GHG reduction by 2035 (5% of the total13% reduction) even though SANDAG's computer modeling did not validate the results of these policies. CARB allowed SANDAG to

justify the GHG efficacy of these policies by using "off-model tools" (research papers and empirical studies in the literature). The agencies have suggested similar policies in the Bay Area could reduce GHG by 6.5%. Have you consulted with CARB to confirm that it will give the Bay Area similar credit? If more money is devoted to these policies than shown at the Dec. 9, 2011 Planning Committee/Admin Committee meeting, can we project increased GHG reduction through these policies?

All three regional agencies that have released their SCSs have taken credit for similar policy measures that cannot be accurately measured in the travel forecast model but there is empirical data that they do reduce GHG emissions. We likely will follow suit with similar measures as part of our SCS, and will determine whether the measures can reduce GHGs further if more funding is provided.

12. Throughout the alternative scenario process, the public and stakeholders were told that of the 5 scenarios being considered, 3 were reasonable (in compliance with federal planning requirements) and financially constrained (in compliance with federal constrained funding requirements). When the modeling results were publicly revealed in late 2011, agency staff disclosed that 2 of the 3 scenarios ("Constrained Core Concentration" and " Focused Growth") were not financially constrained and their GHG results reflected expenditure of almost \$40 billion in transit improvements for which there is no funding. The only I of the 3 that was modeled with a constrained transportation network was "Outward Growth"). Why did the agencies model CCC and FG with an unconstrained transit network after describing them throughout the process as financially constrained? Why was the Outward Growth scenario alone modeled with a constrained network?

The five land use/transportation scenarios were designed to present a broad range of impacts. You'll note from the December 9, 2011 presentation that you reference that there is relatively small variation among the scenarios evaluated. This is primarily due to the extensive development/transportation system already in place in the Bay Area.

#### Scenario Issues

13. To date, the agencies have not released a "trend" land use scenario. Disparate stakeholder groups specifically requested a trend scenario be evaluated last summer. Why haven't the agencies modeled a trend/baseline scenario? Do they plan to do so?

We are preparing a No Project option as required for the program EIR that will reflect current regional plan development capacity.

14. According to agency staff, the MTC Planning and ABAG Administrative Committees in April 2011 gave the following direction for creating the alternative scenarios: "Take a realistic, pragmatic approach when defining alternative scenarios." Do you think the 3 scenarios are realistic and pragmatic?

Yes. See #12 response.

15. In response to the direction, staff proposed creating "distinctly different combinations of land use growth patterns, transportation investments, and supportive policies." Do you think this has been done? (see attached SCAG scenario summaries).

Yes. See #12 response. The scenarios presented different allocations of PDA growth. To compare them to each other, the transportation investments and policies were held constant.

16. The agencies have declared the 3 scenarios are reasonable and in compliance with federal planning requirements. Do you agree with this conclusion?

Yes. See #12 response.

17. On what basis have the agencies determined the 3 scenarios comply with federal reasonableness requirements? Has a formal analysis been prepared?

There are no federal or state planning requirements that compel us to evaluate a set number of scenarios or alternatives.

18. The Bay Area is a nonattainment area and as part of the Clean Air Act conformity process must consult with federal agencies about the reasonableness of the land use projections in the RTP/SCS. Please provide a description of that process, including what agencies will be involved, the names of the relevant officials, their contact information, and a timeline for all meetings and consultations with them.

MTC's Resolution No. 3757 outlines procedures to be undertaken by the MTC, U.S. Environmental Protection Agency (EPA), California Department of Transportation (Caltrans), FHWA, FTA, State and local air agencies and, before making transportation conformity determinations on the RTP and Transportation Improvement Program (TIP) (see attached email list). Interagency consultation on transportation conformity and related air quality planning is facilitated through MTC's Air Quality Conformity Task Force. The Task Force meets monthly.

19. The Plan Bay Area Process & Timeline flow chart (attached) identifies as Step 5 "Assess land use options (ABAG)" and "Compare options to existing local policies (ABAG)". It then describes Step 6 as "Identify preferred land use and investment strategy" and "Approve preferred scenario"). Has ABAG conducted this comparison of the 3 alternative scenarios against "existing local policies"? What is included in "existing local policies"?

Yes. "Existing local policies" is mostly what's permitted by local plans. ABAG also worked very closely with local agency staff to reconcile PDA housing and job capacity. ABAG communicates with Planning Directors from the jurisdictions in an iterative process related to that jurisdiction's land use policies. In some cases, ABAG looks beyond current land use policies in its long term projections, but checks these assumptions for reasonableness with local planning staff.

20. If not addressed in the question above, have the 3 alternative scenarios been specifically compared to existing General Plans for both cities and counties included in the planning area?

While ABAG did not complete an explicit comparison among the 3 scenarios and general plans, there were extensive discussions with local agency staff as described in #20.

21. The Sept. 1, 2011 Memo "Alternative Land Use Scenarios" indicates that the 3 scenarios "do not yet include input from local jurisdictions or analysis of land constraints, industrial cluster support, or public and private investments. This input and analysis will be essential to develop the employment distribution for the Preferred Scenario." Has this input and analysis been conducted?

Yes. See #19 response.

22. Do you consider the projected land use pattern in T2035 to be a "sprawl" land use pattern? No.

23. At regional agency discussions it seems to be taken as a given that current land use policies of cities and counties in the region ("business as usual") are generally bad and fairly characterized as promoting "sprawl." Do you consider a significant number of existing Bay Area city or county general plans to promote "sprawl" in their land use policies for the future? If yes, what prominent general plans fit that description?

No. Many recent general plan updates reflect more focused growth policies that were not evident in plans developed over the past couple of RTPs.

24. How does this perspective align with the position that the Bay Area region is unable to meet the CARB emission reductions because its land use and transportation policies had already produced lower per capita GHG emissions and were on a trajectory to further lessen emissions (relative to SCAG and SANDAG)?

As a slower growth region it admittedly makes our task somewhat more difficult.

25. None of the alternative scenarios accommodates 100% of the region's forecasted housing need. Does SB 375 require the SCS to identify sufficient areas for housing to meet the region's entire projected housing need so that if the housing were built there would be no in commuting from other regions? if not, do you nonetheless believe the adopted SCS should do so as a discretionary policy matter?

The preferred land use scenario does not forecast any net new commuting into the Bay Area. We believe this is reasonable given that we will not likely be able to induce those already in-commuting to the Bay Area given the large housing price differential with the Central Valley. The alternative scenarios were created with estimates and not an official forecast of the region. The draft forecast is now complete and demonstrates that 100% of the region's housing need can be met with 660,000 units by 2040.

26. The materials the agencies regularly distribute describing the PDA place types do not mention densities. The place types come from the 2009 Station Area Planning Manual. The manual does identify densities for each place type. The densities range from 20/acre to 300/acre. The three "reasonable" scenarios assume between 67-79%

- a. Does this mean that the agencies expect that circa 70% of the new population through 2040 will five in new development that is at least 20 units/acre?
- b. Will the SCS specify density projections within respective PDAs?
- c. How do projections for housing units within PDAs compare to existing General Plan designations for those PDAs?

a) Yes, by 2040, 70% of the new households will be living in higher density development. The units being produced in the PDAs will meet or exceed 20 units per acre. There is a shortage of this type of housing in the Bay Area, and the demographics indicate a substantial demand for more of this type of unit. The PDA place type and densities are generally consistent with the existing General Plan designations.

b) Yes.

c) That data are still being developed. GP data do not uniformly go out 25 years; our new land use model under development will provide us with that information based on policy and market information.

# 27. How does each scenario treat the remaining 30% of new units not projected to be accommodated in PDAs? Is the projection that they will live in similar place types with similar densities?

Generally speaking, growth outside the PDAs is assumed to be single family residential or townhouses. ABAG has not yet made specific projections with respect to these densities outside the PDAs.

#### Transportation

28. Regarding transportation investments, do you support the "compelling case" proposed policy that prohibits a project from being included in the RTP if it has a moderately negative impact on the Performance Targets-no matter how well the project scores on a cost benefit.

We have established protocols for compelling cases. See: http://apps.mtc.ca.gov/meeting\_packet documents/agenda 1823/Agenda item 2 Guidance for Applying Proj. Perf. Assessment to Plan Bay Area Investments.pdf

# 29. Under each scenario, how would the share of total future transportation spending differ for each county as compared to the current RTP?

We didn't figure in county shares; however we will do so for the preferred investment strategy.

30. The Bay Area currently spends 2% of total transportation funding on the category Road Expansion: HOV, HOT, ML; and 1% on Road Expansion: General Purpose. The corresponding figures for the other regions are SCAG (20% / 5%), SANDAG (16% / 23%), SACOG (3% / 13%) (see attached document). Do you think the SCS should have as a goal reducing the future share in the Bay Area to below the 2% and 1% figures?

We don't aim for a specific share. Given that our current plan dedicates 80% of funding to maintenance and operations, we are more interested in strategically expanding the system with those projects that perform the best against to our performance measures.

#### **Workshops**

31. What are the main observations/conclusions you take away from the series of scenario workshops?

That there are diverse opinions on how we should grow and what role regional government should play.

32. The workshops asked participants (in person and online) to state their preference for how the region should accommodate projected growth. The alternatives are described as:

- A. Allow new housing, offices, and shops to be built in the centers of cities and town near public transit.
- B. Build more affordable housing near public transit for residents

without cars who depend on public transit while presenting the character of single-family residential neighborhoods.

C. Build more affordable housing in existing communities that already have a strong job base.

Are these descriptions proxies for the 3 identified scenarios? If so, what description corresponds to what scenario? Are the results of this question going to be presented by the agencies as the measure of public support for the scenarios.

a) The descriptions are not proxies for these scenarios but do describe a direction that we need to put more of the projected regional housing and job growth in established communities with good transit service.
b) The same questions were asked as part of our telephone poll, focus groups and community based workshops. The results of these were presented at the April 13, 2012 joint MTC Planning/ABAG Administrative Committee

33. In the contest of defining "complete communities", the workshop materials told participants (in person and online) that "New development (housing) and transportation investments need to be carefully designed to maximize benefits for residents." At the San Francisco workshop, agency staff confirmed that this referred to **existing** residents. As examples of benefits, the materials identified increased parks and open space through development impact fees and better schools though school impact fees. Do you agree that creation of complete communities depends fundamentally on requiring new housing projects to provide maximum benefits to existing residents?

The question's intent was mainly to gauge respondent's opinion to what extent new development should mitigate its impacts. It does not require the new housing projects to provide these benefits entirely, but they should contribute to the benefits. Neighborhood-level plans associated with PDAs identify issues associated with the neighborhood and ways to address them. New housing units alone cannot bear the financial burden of improving these areas. That decision ultimately rests with the cities and counties, not the regional agencies.

#### <u>OBAG</u>

# *34.* What do you think are some of the key drivers in a community's decision to approve housing? How might programs line the One Bay Area Grant help influence that decision?

The drivers likely vary by geography. In the inland areas of the region it may be more of an economic necessity where the financial viability of a city depends on its ability to generate additional revenue from new housing. For the more urban areas, the new housing may be a way to rebuild older communities to make them more attractive and more desirable for businesses and services to locate.

OBAG is intended to reward those jurisdictions that are agreeing to take on more of the growth and have done the appropriate planning to take on this growth. Our experience has shown that neighborhood planning and community engagement early in the process is far better than presenting growth by individual projects. The OBAG helps support neighborhood planning.

# 35. Do you have any thoughts on how OBAG (maybe in future iterations) could be used to incentivize job density?

ABAG staff is considering public policy to promoting job centers in the region. More work needs to be done to articulate how these centers would be defined and is something we could consider in the next OBAG funding cycle to the extent that OBAG helps incentivize employment centers or mixed use neighborhoods, it will assist employers who want to locate in that area.

36. The Business Coalition's comment letter on the initial OBAG proposal suggested that examination of jurisdictions' efforts to identify and remove or mitigate policies within its control that constrain housing development should be part of the criteria for considering grant applications. The revised OBAG proposal does not include this proposal. We believe it is very important that this issue be included in some way in the OBAG program. At the very least it should be a part of the application process if only as an information item that can be tracked over time. Will you support including this concept in the final OBAG program?

The OBAG guidance is currently being revised based on all comments received. A revised proposal will be distributed in April 2012.

37. Once the RTP/SCS is adopted, what do you envision will be the process and specific factors used to determine whether an individual proposed project is consistent with the SCS? What agency do you envision making the consistency determination: the local lead agency (city/county) or ABAG/MTC?

The consistency determination process is still under consideration by MTC and ABAG.

38. Have you had any conversations with the Attorney General's office with regard to the RTP/SCS and the alternative scenarios?

Not at this time, but we intend to.

*39. Have you had any conversations with CARB staff about the alternative scenarios?* 

Nothing substantive, but they have been following our process.

40. What lessons, if any, have you learned from the MPOs proceeding before the Bay Area in developing and adopting their RTP/SCSs?

Mainly that we are all pursuing somewhat similar processes.

41. Have you reviewed the EIR's prepared for the SANDAG and SCAG RTP/SCSs? How do you anticipate the Bay Area's approach to compare to theirs?

Yes. We are still developing our own approach to the program EIR.

42. Is the Bay Area adopting an Alternative Planning Strategy a reasonably foreseeable outcome? What are the benefits/drawbacks of such an outcome?

Our intent is to meet the GHG target with the SCS. The main benefit will be that we can meet the GHG target with reasonable land use and transportation assumptions allowing local agencies more flexibility when taking advantage of SB 375 CEQA streamlining provisions.

43. What role will the adopted SCS have on implementing climate change?

The SCS, by definition, will reduce GHG emissions per capita by at least 15% in 2035 compared to 2005.

#### Requests for Additional Information and Analysis

1. For the following land use scenarios: IVS; Core Concentration I; Core Concentration II; Focused Growth; Outward Growth; Current Regional Plans; Current General Plans; T.2035 Most Ambitious (one of the alternatives studied for T2035\*) using the same overall jobs and housing numbers and the same level of transportation funding and other assumptions that will be used for the Preferred Scenario: The land use scenarios listed above were developed between 2008 and 2012 and utilized different assumptions and control totals. The Sustainable Communities Strategy development process has been iterative involving a great deal of input from many sources and analysis by staff and expert consultants. The results of prior scenario have been utilized in the development of subsequent scenarios. The Current Regional Plans scenario used different regional demographic control totals and an earlier version of our travel model. The T2035 land-use forecast utilized different regional control totals and our prior travel model. Information pertaining to the SCS related scenarios described above is available at:

http://www.onebayarea.org/plan\_bay\_area/land\_use.htm

- The number of total new housing units for the region
- The average overall residential density for the projected new housing development in the region
- The total number of new jobs in the region
- The average overall job density for the projected new jobs in the region
- The number and % of the region's total new housing units that will be multifamily
- The number and % of the region's total new housing units that will be single-family
- The number and % of the region's total new single housing units that will be "small lot" (<5,500 sq. ft. lot size)</li>
- The number of total new housing units for each local jurisdiction in the region
- The average overall residential density for the projected new housing development in each local jurisdiction
- The total number of new jobs for each local jurisdiction
- The number of new jobs categorized by job type for each local jurisdiction
- The average job density for new jobs for each local jurisdiction
- The number and % of each jurisdiction's new housing units that will be multifamily
- The number and % of each jurisdiction's new housing units that will be single-family
- The number and % of each jurisdiction's new singe-family housing units that will be "small lot"

2. Provide a final PDA status report. The staff memo distributed to the RPC in Sept. 2010 (*Planned Priority Development Area Assessment-Planned Growth & Infrastructure Needs*, attached) described the need for such an analysis and committed to completing one: Please See Attachment B

The two primary goals of the PDA Assessment are to gain information about Planned PDAs in order to help hasten development of these areas as complete communities and to support the development of a realistic SCS. While all of the Planned PDAs have been proposed by local jurisdictions committed to sustainable transit-oriented development through local plans, they vary greatly in their visions of complete communities and readiness to produce new housing.

Using information primarily provided by local governments, the assessment will evaluate the scale and type of growth planned to occur in Planned PDAs, the strategies needed to ensure that this growth results in complete communities, how ready local governments and communities are for growth to occur, and the investments needed to make this growth a reality. The desired outcomes of the assessment are to identify the PDAs most ready for implementation and growth potential, identify policies and resources needed to support essential elements of complete communities, and consider policies for prioritizing additional funding to the PDAs via the SCS. The Assessment may additionally assist the Potential PDAs by identifying strategies and policies to facilitate plan implementation.

#### Assessment Approach

The information to be used in the PDA Assessment has been gathered from our local government partners through one-on-one meetings with local city staff and an extensive survey. This information will be complemented by data from other sources, such as the U.S. Census. The assessment is organized around four main topics related to future development in the Planned PDAs:

■ The *Growth Potential* assessment looks at amount and type of growth planned in the PDAs.

■ The *Need* assessment evaluates the amount of types of funding that the PDAs need to achieve their □ desired growth. It also identifies policy changes needed to support growth in the PDAs.

The Readiness assessment will gauge which PDAs are ready for higher-density, transit-oriented 
development. This analysis will focus on funding needs, entitlement process, transit capacity and connectivity, community support, and implementation feasibility.

, community support, and implementation reasibility.

■ The *Completeness* assessment evaluates local plans and community characteristics to determine the □ extent to which PDAs are poised to become complete communities. This analysis focuses on housing choices, multimodal access and mobility, and neighborhood identity and vitality.

We request the final report also include the following information for each PDA, to the extent not already contemplated in the September 2010 memo:

- Allowed residential density range
- Allowed job/employment density range
- Environmental review status: Can the planned housing and jobs (including at the maximum allowable density) be constructed without additional environmental review? If not, what specific type of additional environmental review is necessary?
- Can the planned housing and jobs (including at the maximum allowable density) be constructed without any additional "legislative" land use approvals (general plan, specific plan, rezoning, PUD zoning)? If not, what legislative land use approvals are necessary?
- Total cost of planned infrastructure
- Cost of planned infrastructure/housing unit based on mid-range of allowable density

• Does the PDA assume redevelopment funding as part of its financing? If so, how much?

How much of this funding has been eliminated with the shut down of RDAs?

• What is the total public cost necessary to make the PDA economically feasible?\*

\*When the business caucus met with agency staff and the agencies' economic consultant to develop the Economy Performance Target, the economic consultant stated that the scenario assessments would require these public costs to be accounted for in order to assess each scenario's progress toward meeting the Economy Performance Target accurately. The consultant stated that since the PDAs are planner/local public sector driven, rather than landowner/developer/market proposals, there will be public subsidy dri costs necessarily incurred with each tested scenario, in contradistinction to a trend/market driven scenario, and these costs must be internalized and captured for each scenario being considered. C:\Temp\XPgrpwise\ATTACHMENTA\_Bay Area Business Final 032712\_2\_kk\_1.doc

#### Attachment B

#### BAY AREA BUSINESS COALITION

#### **Questions on Sustainable Communities Strategy**

#### April 11, 2012

#### Process

- There does not seem to have been an analysis done for a "trend" land use scenario. Disparate stakeholder groups specifically requested a trend scenario be modeled last summer in the same manner as the other scenarios. Are there plans to conduct such an analysis? See Attachment A response # 13
- 2. According to analysis done about a year ago by agency staff, the Current Regional Plans would reduce GHG by up to 10% by 2035 (attached). How does the CRPs GHG reductions compare to the expected GHG reductions under the DPS (Draft Preferred Scenario)? Please explain how Current Regional Plans performed better than Core Concentration and Focused Growth despite the fact the latter had the benefit of almost \$40 billion in additional assumed transit improvements for which there is no funding. See Attachment A response # 9
- 3. The agencies have declared that the Jobs-Housing Draft Preferred Scenario is reasonable and in compliance with federal planning requirements. Can you explain further how the agencies determined the scenarios comply with federal reasonableness requirements? Has a formal analysis been prepared? See Attachment A response # 18; the Draft Jobs-Housing Connection report, which is currently being revised, is the formal land use analysis.
- 4. The Bay Area is a nonattainment area and as part of the Clean Air Act conformity process must consult with federal agencies about the reasonableness of the land use projections in the RTP/SCA. Can you please provide a description of that process, including the agencies involved, the relevant officials from each agency, and a timeline of meetings/events. See Attachment A response # 18
- 5. Have you reviewed the EIR's prepared for the SANDAG and SCAG RTP/SCSs? How do you anticipate the Bay Area's approach to compare to theirs? See Attachment A response # 41

#### Consistency with locally adopted General Plans

- 6. The Plan Bay Area Process & Timeline flowchart (attached)identifies as part of Step5 "Compare options to existing local policies (ABAG)". Has ABAG conducted this comparison of the Draft Preferred Scenario against "existing local policies"? What is considered included in "existing local policies"? See Attachment A response # 19
- 7. The Sept.1, 2011 Memo "Alternative Land Use Scenarios" indicates that the 3 scenarios "do not yet include input from local jurisdictions or analysis of land constraints, industrial cluster support, or public and private investments. This input and analysis will be essential to develop the employment distribution for the Preferred Scenario." Has this input and analysis been conducted for the Draft Preferred Scenario? See Attachment A response # 19
- 8. What do you envision will be the process used to determine whether an individual proposed project is consistent with the SCS? What agency do you envision making the consistency determination? See Attachment A response # 37

#### Regional housing needs

9. Does the Draft Preferred Scenario scenarios accommodate 100% of the region's forecasted housing need? In the agencies' opinion, does SB375 require the SCS to identify sufficient areas for housing to meet the region's entire projected housing need so that if the housing were built there would be no in-commuting from other regions? Does it require at least a reduction in current levels of in-commuting? If not, do you believe the adopted SCS should do one or the other as a discretionary policy matter? See Attachment A response # 25

**SCSQuestions** 

### Density

- 10. The materials the agencies regularly distribute describing the PDA place types do not include densities. The place types come from the 2007 Station Area Planning Manual. The Manual does identify densities for each place type. The densities range from 20/acre to 300/acre. The Draft Preferred Scenario projects 75% of new housing units will be in PDAs.
  - a. Will the SCS specify density projections within respective PDAs?
  - b. How do projections for housing units within PDAs compare to existing General Plan designations for the areas covered by each PDA? See Attachment A response # 26
- 11. How does the Draft Preferred Scenario address the remaining new growth not projected to be accommodated in PDAs? See Attachment A response # 25
- 12. At the outset of the SCS process, the agencies suggested that it was reasonable to base the SCS on PDAs accommodating 50% of the region's projected growth. Can you explain further why the agencies determined that it was appropriate to move to70% (75% for housing)? See Attachment A response # 26; upon further review, ABAG determined that some PDAs could accommodate higher densities. In addition there are approximately 60 PDAs that have been nominated by local governments and adopted by ABAG since the SCS process commenced.

### Transportation funding

- Under the Draft Preferred Scenario, how would the share of total future transportation spending differ for each county as compared to the current RTP? See Attachment A response # 29
- 14. The Bay Area currently spends 2% of total transportation funding on the category Road Expansion: HOV, HOT, ML; and 1% on Road Expansion: General Purpose. The corresponding figures for the other regions are SCAG (20% / 5%), SANDAG (16% / 23%), SACOG (3% / 13%) (see attached document). Do you think the SCS should have as a goal reducing the future share in the Bay Area to below the 2% and 1% figures? See Attachment A response # 30

### Regulatory burdens

- 15. In the context of defining "complete communities," the workshop materials told participants (in person and online) "New development (housing) and transportation investments need to be carefully designed to maximize benefits for residents." At the San Francisco workshop, agency staff confirmed that this referred to existing residents. As examples of benefits, the materials identified increased parks and open space through development impact fees and better schools through school impact fees. Is it the agencies' opinion that the creation of complete communities depends fundamentally on requiring new housing projects to provide maximum benefits to existing residents? See Attachment A response # 33
- 16. The Business Coalition's comment letter on the initial One Bay Area (OBAG) proposal suggested that examination of jurisdictions' efforts to identify and remove or mitigate policies within its control that constrain housing development should be part of the criteria for considering grant applications. The revised OBAG proposal does not include this proposal. We believe it is very important that this issue be included in someway in the OBAG program. At the very least it should be a part of the application process if only as an information item that can be tracked over time. Will there be an opportunity to include this concept in the final OBAG program? If not, can you please explain the agencies' decision to remove it? See Attachment A response # 36; the April 2012 revisions/recommendations are available on our web page at: www.mtc.ca.gov/funding/onebayarea

### **Requests for Additional Information and Analysis**

### 1. Comparative Analysis of Scenarios

For the following land use scenarios: Jobs-Housing Concentration, Current Regional Plans, and T2035 Most Aggressive (one of the alternatives studied extensively in the current RTP\*): using the same over all jobs and housing numbers and the same level of transportation funding and other assumptions that will be used for the Preferred Scenario: Information currently available for the DRAFT Jobs-Housing Connection Scenario is outlined below. Current Regional Plans used different regional demographic control totals; it also used an earlier version of our new travel model. The T2035 land-use forecast utilized different regional control totals and our prior travel model.

- □ The number of total new housing units for the region 660,000
- $\Box$  The total number of new jobs in the region 1,119,918
- The number of total new housing units for each local jurisdiction in the region Please see the DRAFT Jobs-Housing Connection Scenario Report; March 9, 2012; Appendices pp 42-45
- The total number of new jobs for each local jurisdiction Please see the DRAFT Jobs-Housing Connection Scenario Report; March 9, 2012; Appendices pp 46-49
- □ The number of new jobs categorized by job type for each local jurisdiction Please see Attachment C

The following items will be provided shortly under separate cover in relation to the Jobs-Housing Connection Scenario and the Current Regional Plans forecast.

- □ The average overall job density for the projected new jobs in the region
- □ The average job density for new jobs for each local jurisdiction
- □ The average overall residential density for the projected new housing development in the region
- □ The average overall residential density for the projected new housing development in each local jurisdiction

The following analysis is underway for the preferred scenario and will be modeled for the Sustainable Communities Strategy. However, it is important to note that the Sustainable Communities Strategy is not binding on local jurisdictions. Local jurisdictions will determine whether or not the development pattern outlined in the SCS is incorporated into their plans and zoning.

- □ The number and % of the region's total new housing units that will be multi family
- The number and % of the region's total new housing units that will be single-family
- □ The number and % of the region's total new single housing units that will be "small lot" (<5,500 sq. ft. lot size<sup>†</sup>)
- □ The number and % of each jurisdiction's new housing units that will be multi family
- □ The number and % of each jurisdiction's new housing units that will be single-family
- □ The number and % of each jurisdiction's new single-family housing units that will be "small lot"

### 2. Provide a final PDA status report.

The PDA Assessment involved multiple interviews with jurisdictional staff and substantial analysis related to planned PDAs. Some of the analysis initially envisioned as part of a final report was incorporated into the development process of the SCS including the development of a PDA place type framework for all Priority Development Areas; the selection of place types by local jurisdictions for their respective PDAs based upon local PDA plans, growth capacity and readiness as well as work done by staff and our consultant team to inform the Sustainable Communities Strategy as well as analysis related to the development of the One Bay Area Grant. Please see Attachment C encompassing reports that have been developed in relation to the PDA Assessment conducted in 2010 and consultant reports and technical documents containing detailed information regarding the role of PDAs relative to employment and housing growth.

The staff memo distributed to the RPC in Sept. 2010 (Planned Priority Development Area Assessment – Planned Growth & Infrastructure Needs, attached) described the need for such an analysis and committed to completing one:

The two primary goals of the PDA Assessment are to gain information about Planned PDAs in order to help hasten development of these areas as complete communities and to support the development of a realistic SCS. While all of the Planned PDAs have been proposed by local jurisdictions committed to sustainable transit-oriented development through local plans, they vary greatly in their visions of complete communities and readiness to produce new housing.

Using information primarily provided by local governments, the assessment will evaluate the scale and type of growth planned to occur in Planned PDAs, the strategies needed to ensure that this growth results in complete communities, how ready local governments and communities are for growth to occur, and the investments needed to make this growth a reality. The desired outcomes of the assessment are to identify the PDAs most ready for implementation and growth potential, identify policies and resources needed to support essential elements of complete communities, and consider policies for prioritizing additional funding to the PDAs via the SCS. The Assessment may additionally assist the Potential PDAs by identifying strategies and policies to facilitate plan implementation.

<sup>&</sup>lt;sup>\*</sup>See attached Table 4 prepared by CARB during the target setting process based on information provided by MTC/ABAG. <sup>†</sup>See same Table.

### Assessment Approach

The information to be used in the PDA Assessment has been gathered from our local government partners through one-on-one meetings with local city staff and an extensive survey. This Information will be complemented by data from other sources, such as the U.S. Census. The assessment is organized around four main topics related to future development in the Planned PDAs:

- The **Growth Potential** assessment looks at amount and type of growth planned in the PDAs.
- The **Need** assessment evaluates the amount of types off funding that the PDAs need to achieve their desired growth. It also identifies policy changes needed to support growth in the PDAs.
- o The **Readiness** assessment will gauge which PDAs are ready for higher-density, transitoriented development. This analysis will focus on funding needs, entitlement process, transit capacity and connectivity, community support, and implementation feasibility.
- The **Completeness** assessment evaluates local plans and community characteristics to determine the extent to which PDAs are poised to become complete communities. This analysis focuses on housing choices multi-modal access and mobility, and neighborhood identity and vitality.

We **request** the final report also include the following information for each PDA, to the extent not already contemplated in the September 2010 memo:

Many of the items outlined below and that were not addressed relative to planned PDAs as part of the PDA Assessment work in 2010 will be considered in relation to policy development for Plan Bay Area. We look forward to working collaboratively with the Bay Area Business Coalition to advance the implementation of Plan Bay Area.

- □ The minimum and maximum residential density range.
- □ Minimum and Maximum job/employment density range.
- □ Environmental review status: Can the planned housing and jobs (including at the maximum allowable density) be constructed without additional environmental review? If not, what specific type of additional environmental review is necessary?
- □ Can the planned housing and jobs (including at the maximum allowable density) be constructed without any additional "legislative" land use approvals (general plan, specific plan, rezoning, PUD zoning)? If not, what legislative land use approvals are necessary?
- □ Total cost of planned infrastructure.
- □ Cost of planned infrastructure/housing unit based on mid-range of allowable density.
- □ Does the PDA assume redevelopment funding as part of its financing? If so, how much? How much of this funding has been eliminated with the shut-down of RDAs?
- □ What is the total public cost necessary to make the PDA economically feasible?<sup>‡</sup>

<sup>&</sup>lt;sup>\*</sup>When the business caucus met with agency staff and the agencies' economic consultant to develop the Economy Performance Target, the economic consultant stated that the scenario assessments would require these public costs to be accounted for in order to assess each scenario's progress toward meeting the

Economy Performance Target accurately. The consultant stated that since the PDAs are planner/local public sector driven, rather than landowner/developer/market proposals, there will be public subsidy costs necessarily incurred with each tested scenario, in contradistinction to a trend/market driven scenario, and these costs must be internalized and captured for each scenario being considered.

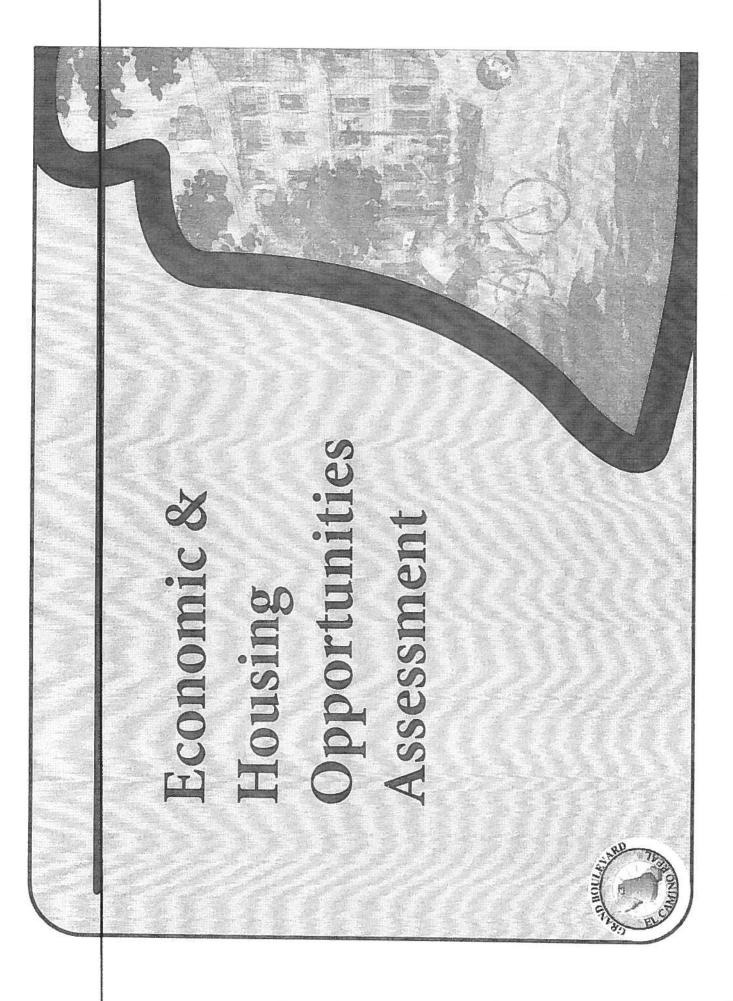
### ATTACHMENT C

### Date Files:

- Jobs-Housing Connection Employment Distribution Details\_2.xls
- Jobs-Housing Connection Employment Distribution Details\_3.xls
- Jobs-Housing Connection Employment Distribution Details 1\_2.xls
- Employment Distribution Patterns Presentation
- Memo for Regional Advisory Working Group September 2010 final
- Memo for Regional Advisory Working Group October 2010 final
- Memo for Regional Advisory Working Group November 2010 final
- CCSCE Bay Area Job Growth to 2040
- CCSCE Regional Projections to 2040 Presentation
- CTOD Demographic Shift and Implications for TOD Housing Dem.
- CTOD Historic and Projected Employments Trends in the Bay Area

### See: http://www.onebayarea.org/plan bay area/land use data.htm

Data compilation is still underway, most notably on housing mix. As this information becomes available, we will post on this website.



CHALLENGES	Market Challenges
Physical, market, and regulatory challenges to infill development on	Higher costs of infill development – The building construction costs of higher density projects in infill locations are often
the Grand Boulevard including the following:	considerably higher than for low density development on the
Physical Challenges	
<ul> <li>Small sites – Although there have been some large-scale development opportunities on the Corridor, the majority of the future development opportunities will be on small, shallow, and irregularly shaped sites. Small and irregular sites are more difficult to develop into higher density projects because of the physical constraints they present.</li> </ul>	<ul> <li>Land values are higher than in other places – Corridor land values are high, partly due to the strong regional location and access to major employment and activity centers. Lanclowners are often long-term investors with little motivation to sell, making it challenging for developers to acquire land at a reasonable price for development.</li> </ul>
<ul> <li>Fragmented site ownership – Many development sites, such as under-performing shopping centers, are composed of multiple parcels with various land owners. This situation is often challenging for a developer because each property owner may</li> </ul>	<ul> <li>Lack of financing for housing development – The credit market continues to be tight, particularly for real estate financing. Some high-quality projects on the Corridor with strong market support have not been completed due to financing challenges.</li> </ul>
have different investment goals, time frames, and motivations.	Old "big box" shopping centers are difficult to convert to other

Visually unappealing environment – The existing visual character particularly to housing in the formats that can fulfill the vision of of some segments of the Corridor is a deterrent to new investment, a Grand Boulevard. .

- $\subseteq$ d o
- ଜେଉର୍ଦ୍ଦ
- t o t
- Old "big box" shopping centers are difficult to convert to other uses - Many single-story commercial sites on the Corridor have strong-performing retail uses that can generate revenue streams that will satisfy most property owners. In addition to high land values, these properties also require expensive demolition and site clearance, adding to the cost of development. •
- Housing prices have not yet recovered Bay Area housing prices are still depressed, particularly for attached housing products. It will take some time for the market to strengthen sufficiently for housing development to accelerate once more. •

### **Regulatory challenges**

- Land Use Limits Many locations on the Corridor do not permit the housing and mixed-use development types that are envisioned for the Grand Boulevard and that would maximize land values for property owners.
- Height Limits Most cities on the Corridor have height limits that prohibit the construction of buildings over five or six stories.
- Length and predictability of entitlements Some jurisdictions have lengthy and/or unpredictable approvals processes that slow down development and increase costs and risk for the cleveloper.
- City fees Some cities charge high development impact fees that increase total development cost significantly.
- Requirement for mixed-use retail on ground floor overestimates demand in many places – In many cases, cities require ground floor retail uses for new buildings continuously on the Corridor to add vibrancy and encourage pedestrian activity. However, many sites on the Corridor are not desirable locations for retailers, and therefore cannot attract strong tenants, which leads to vacant storefronts.

- High minimum parking requirements Often minimum parking requirements are higher than necessary and in conflict with the envisioned multi-modal, pedestrian friendly character of the future Corridor, making some desired development types financially infeasible and physically difficult to design due to the high cost of structured parking and/or large parking footprints.
- Inflexible below market-rate (BMR) housing requirements A majority of the cities on the Corridor have a requirement for inclusionary below market-rate housing units, in order to generate affordable housing on the Corridor. While some cities allow developers to pay an in-lieu fee that allows the developer to contribute to an affordable housing fund, others require that the units be built on-site. The requirement to add inclusionary units to the building envelope can sometimes render a project financially infeasible, particularly for smaller sites that are already physically constrained.

	STRATEGIES TO ENCOURAGE INFILL DEVELOPMENT ON	٠	Appropriate zoning to accommodate a range of densities along
-	THE CORRIDOR		the Corridor - There is no "one size fits all" solution to infill
			development. While it is important to encourage intensification
	Based on the research gathered on recent development patterns,		of the Corridor to meet the GBI goals, it is probable that future
-	opportunities, and challenges, the Consultant Team has identified some		development will occur at a range of densities. Local jurisdictions
-	of the key strategies that can be employed by the Corridor jurisdictions		should target taller, higher density zoning at strategic locations
	to encourage the transformation of the historically auto-oriented El		that can achieve high values to offset the higher development
-	Camino Real.		costs, and lower- to moderate-density projects in other areas.
	<ul> <li>Assistance with site assembly and acquisition – Some of the</li> </ul>	•	Limit requirement for around-floor retail to key nodes, and allow
	Grand Boulevard communities have redevelopment project areas		for residential uses on the ground floor in certain locations -
	on the Corridor, which would allows the local redevelopment		Restricting ground-floor retail requirements to strategic nodes
	agency to strategically use its powers for site acquisition and		prevents the development of empty storefronts on the Corridor
	assembly.		and broadens development options to allow property owners to
-	<ul> <li>Provision of infrastructure improvements – The City of Berkeley</li> </ul>		maximize investment.
	made public investments in medians and street trees on San	0	Parking reductions - Reduced parking, along with enhanced
	Pablo Avenue, a similar auto-oriented corridor, to enhance the		transit service and transportation demand management (TDM)
	environment for existing businesses and to encourage new		programs, can be helpful for reducing the cost of development
	development. Many segments of the El Camino Real Corridor		and encouraging desired building types on the Corridor,
	may also benefit from up-front investments in infrastructure and		

envisioned land uses, describe desired development types in sufficient detail, and expedite the approvals process for projects on the Corridor would reduce risk and cost to the developer and ensure the community's vision is realized.
Re-evaluating city fees – Some cities may choose to re-evaluate their existing development impact fee structure to assess the extent to which it may be discouraging development on the

Updating regulatory environment and streamlining the entitlements process – Establishing regulations that permit

•

place-making to encourage clevelopment.

 Re-evaluating city fees – Some cities may choose to re-evaluate their existing development impact fee structure to assess the extent to which it may be discouraging development on the Corridor. Similarly, in some cases, it may be appropriate for some cities to create more flexibility with BMR requirements by allowing developers to pay in lieu fees rather than providing affordable units on-site.

### MTC Planning Committee with the ABAG Administrative Committee and the Joint Policy Committee – 9/10/10

- Jim Spering: I'd like to call the MTC Planning Committee to order. We will be convening the ABAG Administrative Committee and the Joint Policy Committee. We just have a little bit of business for the planning committee to do first and we'll get to Item #3 where all three committees will participate. First is the Consent Calendar. Steve, I think you have some comments.
- Steve: I do have one brief comment to fellow commissioners as a question as well as to Steve as a comment. Our Congestion Management Agency in Marin County has consistently found the CMP to be an unhelpful document, not a useful document in planning. This report calls it out as a building block, a primary building block of our transportation system so I have a real disconnect with that characterization. I think that what we're finding is that all of our grandfathered projects, you can't touch them because if you do you've got to do so much that it's not there. So I just wanted to bring that out. I know this is just a pro forma update of our congestion management, but that's part of the problem is we've just allowed this thing to roll along even though I don't really believe it serves. Now I don't know about the other counties but I would encourage Steve and the staff to check in with the CMA directors. I can tell you that in our county it has consistently been viewed as an unhelpful document. Thank you.
- M: I don't know if the chairman of our transportation commission wants to comment on it. I was going to say we just had that exact same discussion yesterday at our meeting and we were assured by our new executive director Art Dow that in fact we are going to do our level best to make this a building block. I think we would agree with you at this point that it has been a relatively useless document.
- Steve: It doesn't work multimodally either which as we're trying to get these other things going and integrate our thinking and the land use component none of these things can get reflected in the plans.
- Jim: Did you want to comment on this subject?
- M: Sure I would, quickly. I would not I think every county is different. In Alameda County I would not consider it to be a useless document presently, or for that matter in the past and I certainly don't think it will be in the future either so I will not join the Marin chorus line on that one. I think that actually in our case we've used it successfully and will continue to do so.

M:	Steve, do you think a review, or come back to the committee to talk about?
Steve:	Look, I'd be happy to. Doug and I were looking at each other with puzzled looks on our face because
Jim:	I saw that.
Steve:	we generally do not view this as a major item of business. It's a Federal mandate so we've got to do it and we try to do it in a way that minimizes extra effort and trouble for the CMAs. I mean what we do with the CMAs goes well beyond this – someone called a pro forma. It more of less is attempting just to encapsulate the work we do with the congestion management agencies. That's what we've tried to fashion it as. If it's not performing to that purpose we're happy to review it.
Jim:	What I was thinking, instead of taking the time here is to – maybe Steve has some issues that really are worthy of discussion. So I would like to see if we could bring it back and just
Steve:	Happy to do so.
Jim:	and just maybe have an overview. And if one of the two of you can contact Steve and kind of maybe get a little more detail so when it does come to us we have a better understanding of what he's referring to.
Steve:	Sure
Jim:	Thank you. We have this item on consent. Is there a motion to approve consent? We have a motion and second. Any dissent? Hearing none that motion passes unanimously. We'll now move on Item 3, this is the MTC Planning Committee/ABAG Administrative Committee/Joint Policy Committee Discussion: Implementing SB 375 and its Sustainable Community Strategy.
M:	We have to call the Administrative Committee to order.
Jim:	Oh, okay.
Mark:	I'll take a brief roll call. Supervisor Adams (here), Supervisor Avalos (here), Supervisor Cortese (here), Supervisor Gioia (here), I am here, Supervisor Haggerty (here), Supervisor Gibson (present), Councilmember Licardo, Supervisor Luce, Councilmember Pierce (here), and Supervisor Spering (present). We do have a quorum.

ч ж

Jim:	You know Mark, I would like to go around the table real quick and have everybody introduce themselves and who they represent.	
Tom:	(?) with Housing American Development	
Steve Kinsey:	Marin County Cities and County	
Dave Cortese:	Representing ABAG.	
Mark Green:	Mayor of Union City, President of ABAG	
Julie Pierce:	City of Clayton and ABAG Admin	
Rose Jacobs Gibson:	San Mateo County Board of Supervisors and representing ABAG Executive Board	
Jean Roggenka	mp: Bay Area Air Quality Management District	
Jane Brunner:	President of Oakland City Council, representing ABAG	
John Gioia:	Contra Costa County Supervisor on ABAG, Air Board – I think I'm wearing the ABAG hat today.	
Susan Adams:	Marin County Board of Supervisors, Vice President of ABAG and just to note, it's minor, but in the minutes it said Susan Adam, not Susan Adams	
John Avalos:	San Francisco Board of Supervisor – ABAG Executive Committee and Admin Committee	
Pam Torliatt:	Mayor of the City of Petaluma and Director for the Bay Area Air Quality Management District	
Doug Kinsey:	MTC staff	
Adrienne Weil:	MTC General Counsel	
Steve Heminger: MCT Executive Director		
Ezra Rapport:	ABAG Executive Director	
Ken Moy:	ABAG Legal Counsel	
Chris Daly:	From San Francisco, here with the Air District	
Dorene Giacopi	ni: USDOT representative to MTC	

1. .

Tom Bates:	Mayor of the City of Berkeley, Air District, BCDC
Ann Halsted:	Representing BCDC and MTC and also MJPC
John Rubin:	Representing the Mayor of San Francisco on MTC
Amy Worth:	Representing Contra Costa cities on MTC
Scott Haggerty:	Alameda County Supervisor, Air Board Member, ABAG Member, MTC Chair
Ash Kalra:	City of San Jose Councilmember and also on ABAG and BAAQMD
Jim:	Thank all of you for attending. One thing before we get into the next item which Doug I guess you're kicking off is that I would encourage everybody, as you hear information here, you take it back to your respective agencies, share it with your colleagues, make sure that our sphere of information is broadened, other than just this committee. As we embark on the SCS one of the important points of being successful is how well we get information out in the Bay Area among the elected officials and policy makers. So with that said, Doug
-	

Yes, I'll handle the first item. This is a review of the California Air Doug: Resources Board's staff recommendation for setting greenhouse gas emission targets. This was released August 9<sup>th</sup> of this year and it's included in your packet with a brief summary from your executive director. You'll recall in July MTC adopted greenhouse gas emission reduction targets of 7% in 2020 and 15% in 2035 compared to 2005 and the CARB staff recommendation is to accept those targets. So that's what they're recommending to their board which is going to meet September 23, 2010. One thing that the CARB staff is not recommending at this time is uniform targets. That was one of the principals included that was adopted by the commission that we were recommending that CARB consider having statewide uniform targets for both 2020 and 2035 and it doesn't seem to be that's going to be the case with the CARB recommendation. However, given the CARB recommendation and recent developments in Southern California we think that we're in a pretty good position and so we're recommending really that the staff not make any – or the commission not take any action at this time. We're going to present the principals to CARB – Steve will be doing that on September 23<sup>rd</sup> where we will support the recommendation for the targets - the consistency with the targets between what you adopt and what they're recommending and we'll also recommend, although it's unlikely that CARB will go along with this statewide uniform targets. So that's my summary. I'd be happy to answer any questions you might have.

Jim: I would like Steve to kind of expand on the process that's going to go before CARB and with the other regions.

Mr. Chairman, happy to – in your packet on Agenda Item 3a. you can see Steve: the targets for what they've been calling the Big Four metropolitan organizations that the staff of the Air Resources Board has proposed. You'll see that they have an asterisk for the targets in Los Angeles which is under the jurisdiction of the Southern California Association of Governments. The other three targets in the Bay Area, Sacramento and San Diego, as a result of board actions in those areas that recommended target levels, the staff is essentially copying back those recommendations. In the case of SCAG, the staff report had to be released before the SCAG board acted. The SCAG board acted after it was released and requested lower targets of 6% in 2020 and 8% in 2035. They did so in a deeply divided vote. SCAG's board is like bigger than anything you've ever seen so it was like a 29 to 21 vote and the question now before the Air Resources Board is three of the regions sort of made it easy on them by asking for targets that they thought were appropriate. Now there is a disagreement for the target for the largest metropolitan area in the state. The other thing that the CARB staff did – it's not shown in that table – is they identified targets for the Central Valley of 5% in 2020 and 10% in 2035. So significantly lower than the targets for the other four large metropolitan areas. One reason that is troubling is that the growth that the Central Valley is expected to experience over the next 25 years is about equal to the combined growth of the Bay Area, Sacramento and San Diego. They are going to grow really fast and I think one of the things that motivated us to recommend, and the Commission to endorse the notion of uniform targets is that we're all in this together and we certainly shouldn't be having the fastest growing area of the state shooting for a lower target than the rest of us. And when you look at the targets for 3 of the 4 large metropolitan areas they are so close that there's really no good reason why they shouldn't be the same. As Doug said though, I think we've probably lost that argument already and I think the discussion at the Air Resources Board at the end of the month is not going to be about putting these numbers together, but probably about trying to keep rebellions from breaking out in Los Angeles and the Central Valley. So I think it is likely that we will wind up with separate customized targets. I think for 3 of the 4 metropolitan areas they will probably be more or less the same, not identical. I think one key question is whether they will stick with their staff recommendation for L.A. or go with something lower that L.A. has requested. And I think in the case of the Central Valley, at least our understanding is that some folks in the Valley think 5 and 10 is still too high and may be asking for something even lower than that. So that's the state at play as we understand it and as Doug indicated I plan on being there on trying to encourage them in the direction of uniformity, but probably going to end up falling a bit short on that.

In terms of our own interest, just selfishly here in the region – I think we had a long discussion about it regionally, this committee as well as the commission and the staff is recommending what we ask for. So I think we're in pretty good shape in that respect and I would not expect the targets for the Bay Area, Sacramento and San Diego to change from what is shown here. I think since we asked for them and the staff is recommending them, I think the Board is likely to approve them.

M: Doesn't the Valley that has the most growth potential have the most opportunities to deal with this?

- Absolutely. I know most of you are familiar with the situation in the Central Steve: Valley and it's not pretty. Their economic condition is far worse than anywhere else in the state - their levels of poverty, long standing issues, their levels of air pollution for that matter, and as the climate warms it's going to get hotter and hotter out there. So I think there is, on behalf of the staff of the Air Resources Board, a concern of not dropping the hammer down too hard on the Central Valley, but in my opinion the Central Valley is the acid test of whether this statute is going to work. The fact that the Bay Area, Sacramento and San Diego asked for relatively high targets I think is an indication that most of you want to do this stuff anyway and many of our policies have reflected this direction for years. So I don't think we're the hard case and I don't think we need a state law to tell us to do a lot of this stuff. I think the Central Valley does and if the target undershoots I think we really are running the risk of underperforming on reducing climate emissions.
- Scott: I guess in relationship to the Central Valley, to me it's kind of like this is what we're trying to get at. If you want to grow you have to show how you can do it and not harm the environment which would say to me that they need to put together very good transit programs before they start figuring out how to just build houses. I think they're not really understanding the whole intent of what it is we're trying to do here.

Secondly, has there been any discussion Steve amongst the four MPOs, your peers anyways, to try to say look we're the big dogs in the house, let's have the same figure? I realize now that Los Angeles has kind of gone sideways, but to me it doesn't seem right to me, or even intuitive, to have the major MPOs anyways to have all these different goals. It seems like I believe the state should have their goal. I believe there should be one goal. Has there been a discussion amongst the four to try to say look, let's take the lead in this?

Steve: Oh, lots of it.

Scott: But you just can't get there?

- Steve: One of the ticklish things, and just as the Central Valley is growing faster than the rest of us, one of us is growing faster than the other three and that's Sacramento. As Commission Spering indicated, really the faster you grow the more capability you have for change.
- F: Exactly
- Steve: And so the difficulty we had is a slower growing region like ours versus Sacramento, we were trying to find the happy medium. I think we got pretty close. The numbers are identical in 2020, with the exception of SCAG. And I think over time we might be able to pull off a uniform 2035 target. Remember this is just CARB's first pass through this action. They're required by law to revisit these targets every few years and so we may lose the argument on uniformity this time, but I think we might be able to win it later on.
- Pam: With the other counterparts have you put together some sort of presentation or something that looks at how they could actually do better? You put it together for us basically, but when we're looking at the state as a whole, is CARB putting that kind of a presentation together to look at where people really have the ability as was being stated, to in the fastest growing region, to actually reduce their impacts? I would think some sort of chart would make it really clear of why we're doing this not because we want to, but because we really need to.
- You have seen the work that we've done here. You've had to sit through Steve: it. And my counterparts at the other three Big Four agencies have done the same thing to guite a level of detail and I think one of the most valuable things about this process is that it has caused us to do this work together and it's required us to harmonize a lot of our assumptions. Up until now we all had a different price of gasoline in 2035. Now one thing we're probably sure of is we're all wrong, but we should all be wrong together instead of one guy thinking it's \$7 and one thinking it's \$5 because that obviously has some affect on how you think people are going to travel. So we have learned a lot of lessons in this work and one thing I do want to do and you're reminding me is that when we go through this for real now - and we're about to kick off the process in the Bay Area for real – I do want to bring some of the lessons that we've learned from the other metropolitan areas to bear here because we don't know it all. We think we do sometimes, but we don't know it all and we can learn a lot from what Sacramento and San Diego and even Los Angeles, what they're doing.
- Pam: I guess my point is have you put it together cumulatively to show the stark difference of what could be done in these other areas.

### Steve: Yeah, we have.

Pam: And CARB just is not...

Steve: Well again, CARB's got their hands full right now. As you know they've got a couple of ballot measures pending – one especially that would throttle their overall climate change program. So I think there is a bit of thinking up there that they would like to do this without ruffling a lot of feathers. And so when you do have three different big metropolitan areas saying here, we're willing to have this target, and if it's high enough for CARB they're going to say you've got it and that's what they've done.

### Pam: I'm concerned about the Central Valley target. That's what I'm saying.

- Steve: What I've heard, again most from the staff on an informal basis I think we'll hear more of it formally at the board meeting – is it's almost at a level of pity, if I can use that word, for the Central Valley. Like those guys are in such bad shape we really can't run them through the wringer here. And I don't think that's the right approach. It's almost patronizing to me. But that seems to be the attitude that we really can't ask them to do as much as other regions in the state when in fact I think we should be doing precisely that.
- Jim: Amy and then Sue.
- I just had a couple of questions, coming back to the Bay Area. I guess Amy: these are questions that I've continued to have, but I guess as we grapple with this I'm still struggling with it. First of all we've identified some targets, but I think part of the debate is we haven't agreed on how we're going to get there. So I think that's where the Los Angeles fight is coming out because those folks, those cities know that their people are going to be impacted by the cost of this. So I guess my question is at what point do we have an open, public discussion about some of the issues that staff brought last time in terms of say if we're going to require people to live in different places, if we're going to tax people for driving, what are those costs going to be, and at what point does that become part of the public debate? Because I think that's part of the discussion here, probably in all the areas. And representing a county where my constituents are going to be paying a lot if we move in that direction, I'd just like to know - I think it's important that we know how we're going to do it and what those costs are going to be? And again, engage the public really in understanding this.

And I guess the third question I have is what's going to happen if we set these targets and then we understand that the way we're going to have to do it is by measures that this region isn't prepared to take on, then what happens to the region when we have these targets and we're not achieving them?

Steve: The short answer is we're going to be starting that for real in a couple of months. I think we tried to emphasize to you when we showed you those very broad planning scenarios about land use changes and road pricing and transportation demand management that they were just that – they were planning scenarios. They had no more constituency than me and Doug. That was it. We dreamed them up. We put them on the table. We were trying to just inform your process of picking a target and Commissioner, you're right. I think everybody is looking at targets without really knowing how we're going to get there. So that's a big nerve wracking. Now, CARB will establish the targets this month one way or the other and then in a couple of months after we will have to start the scenario planning process for real and that's a process where we want to engage you and your citizens and your local staff in developing those scenarios. That's not just going to be me and Doug. That's going to be everybody and it has to be for real because we've got a plan here that we've got to adopt that under Federal law has to be realistic demographically and financially. We just can't make it up.

Now, to your last question – what happens if we go through all that and we don't get to 15%? Well Senate Bill 375 actually does have a trap door that says if you can't make it you're allowed to do something else called an alternative planning scenario. CARB has to agree that you can't make it, that you're not sort of fiddling with the numbers to make it look like you can't make it. But if they do you're allowed to do this alternative scenario which theoretically at least, we haven't been through this yet, but at least as it looks in the law, allows you to adopt the plan and not meet the target. So there does seem to be a reasonable path through this that if the target turns out to be too high that you're not able or willing to really put the strategies together to get there, you've got an out.

- Jim: Before I go to Sue, just follow-up Steve. As we go through that analysis are we going to be looking at what projects help us get there and which ones don't? Is there going to be a "this is a project we probably shouldn't be doing and this is one that we should be doing?"
- Steve: My sense of it is Commissioner that we'll probably be looking at 5 broad categories of things and you've already seen 3 of them. One is land use changes. A second is road pricing always a popular subject. A third is transportation demand management what employers and others can do. A fourth is infrastructure what projects are in the plan? Are they pulling in the right direction? A fifth that we've given very little attention to is what I would call smart driving and that has to do with the fact that emissions for greenhouse gases are on a u-curve and if you're going too slow you've

MTC Planning Committee with the ABAG Administrative Committee and the Joint Policy Committee Page 9 of 16 got too many emissions. If you're going too fast you've got too many emissions. There's a little goldilocks spot where you want to be and so strategies that reduce speed in some cases or increase speed in others are also ways to reduce greenhouse gas emissions. So I think at least those 5 broad categories, there may be more, we will be examining and trying to put together sort of a menu of what really gets us to the target in a way that we can all stand by.

- Jim: Sue and then Dave.
- Sue: I'm just going to add to the discussion that we're kind of all in this together and what happens in the Central Valley really impacts our area - their truck traffic coming through part of the area. And I think the success of this really rests on political leadership and I think that's why the Bay Area has been so successful in doing this. Along those lines, I was curious, does the League of California Cities, are they involved in playing a role because I think they actually speak for - they have a very vocal membership from the Central Valley and maybe that's a way to get at it. At a previous MTC legislative meeting we had a discussion on Proposition 23 which would undo a lot of this and if you look at the cities who are supporting this many of them are Central Valley, Southern California cities. You don't see any cities from the Bay Area. I think we really need to bring the League into this discussion. I don't know if they play a role, but I think they would be a very important education viaduct to maybe getting to some of these cities because they have so many other problems. They're more concerned about jobs and the climate and the environment is not high on their agenda. It's not going to happen unless you change the political leadership education in that area.
- Jim: Dave and then Julie.
- Kind of a process question, but it seems to me if I'm reading and Dave: understanding this right that some of the attention is obviously trying to get everybody on or very, very close to the same target in all these congestion management areas basically, or these COG areas. But all of it is just to inform the statewide target setting basically. It's not going to be binding in and of itself. Does it make sense at this point to accept everybody's kind of thorough, detailed work as autonomous and well thought out, but then try to come up with a blended analysis, a blended number? I don't know why - I think it's because of years of serving on pension boards - all of a sudden I'm looking at this saying you're not going to be able to pull all of this diversity together in one number, but what you could do, almost as an actuary would do, is take all this now and analyze it collectively and see what does it really mean in terms of what I would call a blended number or a leveled number and once that's done then it seems to me you can work the alternatives off that blended number because if Santa Clara County

MTC Planning Committee with the ABAG Administrative Committee and the Joint Policy Committee Page 10 of 16 stops growing dramatically in terms of housing it probably means – I'm just throwing this out there as an example, it may not be sound – but maybe it means that Central Valley all of a sudden does pick up and starts to change more dramatically. We saw that happen in the 90's. I don't know what those alternatives might look like, but it seems to me that once we could get at least something that everyone could agree is a statistically valid blended number then you can get to the next level and start working on alternatives to submit to CARB that might allow some flexibility down the road. The question on that is, is that possible? Am I distorting the process, or what?

Steve:

I think it's possible. The law does require CARB to set these targets by metropolitan region. That's the law. Now it doesn't prohibit them from setting the same one and in fact that's the advice they got from the advisory committee that I participated in. They don't seem inclined to do that. The fact is when you sum up the results of these targets you get a number. You get a greenhouse gas emission reduction. That number is fairly close to the number they had put in their initial scoping plan – the scoping plan they adopted under AB32. So despite the disparity and all the numbers moving around, what they produce in terms of greenhouse gas emission reductions is pretty close to what CARB wanted. Now I think largely these different numbers raise questions about equity between region and whether business location decisions and other things might start getting made on the basis of this and I think it's too soon to know that, but I think that was one of the concerns that our advisory committee had about picking different targets. Now I think within the region Commissioner we will very much be blending and the discussions we've had – we were just up in Solano County yesterday – in various counties around the region, some counties are going to do more, some are going to do less and that's going to be fine as long as we can try to get to the regional objective that we're trying to reach. I do think once we get past this statewide process - which anything statewide in California just seems to be messy these days – once we're back in our own sandbox. I think your blended approach is exactly what we're going to do.

Dave: I guess from a technical standpoint just one follow-up question. Is it possible to satisfy CARB's desire to have individual numbers like we have now, and also submit to them something that they'll take seriously, meaning this blended approach number as well? Not an either or – say here's your individual numbers, we're in compliance now, but here's what we think it looks like when you blend based on actual growth, actual population, on a statewide basis instead of trying to look region by region and give them both to try to help guide them so at least there is some chance the final number comes in close to what we would feel the blend is. I realize that's costly for someone to do that work and maybe that's going to be part of the issue.

> MTC Planning Committee with the ABAG Administrative Committee and the Joint Policy Committee Page 11 of 16

- Steve: But I do think it's conceivable and now that I'm thinking about it as you've been asking the question, the thing we've got to keep in mind is that not necessarily everybody is going to meet the target established, right? You may have some regions that do and some regions that don't and then do an alternative scenario and so they're only going to get so far toward their target. And as you say CARB is going to have to true that up and figure out whether as a state we are still getting as far as we need to go? And I would expect that might mean ultimately adjusting the targets over time, and frankly that's another reason to worry about starting with these kind of disparities because if they're going to set let's say a 10% target in the Central Valley and what the Central Valley is able to do is 7, well who do you think they're going to ask to do more next time around? So all the more reason again for all of us to be in the boat together and not some of us somewhere else.
- Dave: Thank you
- Jim: Julie and then John
- Julie: Thank you. I appreciate the work that staff has been doing on this and as I went through the League of California Cities resolutions with my City Council the other night and got direction on how to vote I have to tell you this whole process is becoming very troubling. I think in many ways the process, while well intentioned, is backwards. We are setting a target and then figuring out if we can meet it and what is that cost going to be? We don't even know. You've heard me on this over and over and over again, giving the scenario of my cities out in East County of Contra Costa where many of them commute 60 to 70 miles a day each way because many of them commute to the Silicon Valley. They commute to San Jose. They commute to the city. And we don't have mass transit out in East County yet. We're working on it, but we don't have it yet and if the 50 cents a mile, vehicle miles traveled tax was imposed that's a huge financial burden. Will it drive some of them to change the location of where they live? Probably not because the cost of moving in closer isn't going to get cheaper. Will it allow businesses to move to those locations where the folks are? Good question. If it's a lot cheaper to locate in the Central Valley that's where they're going to go. I think we have got this a little bit backwards. We haven't figured out what we can afford to do and then set the targets by what's actually achievable. But that said, I will tell you I have great concerns about what's going to happen with AB32 and the ballot measure in November. Having been a member of the task force committees at the League and going through the discussions about support and lack of support for AB32 over the last several months and the healthy discussion that's taken place at the League about whether to accept the task force recommendations, I see where the Central Valley

and Southern California are coming from. That's where this effort came from to overturn AB32. And that's consistent with what they're asking for in targets. They're saying sorry folks we don't want to do it. I hate to tell you but I think there's a lot more Northern California people who believe that too. We in this room may think it's the right thing to do. We may agree with the idea – and believe me, I talked myself blue in the face on Tuesday night trying to convince my Council to oppose this initiative at the League of Cities and I was outvoted 4 to 1. I went down in flames. And they are absolutely adamant so I'm going to have to go and vote opposite the way I personally feel because I've been directed how to vote at the League. But I've got to tell you it's not looking pretty. So I'm a little concerned about yes, I want to be a leader in this state and I think that's the right thing to do, but I have a feeling we're in trouble and I guess my biggest question to staff is what happens if the initiative in November passes? What does that do to this effort? Does it just blow it up, or put on the brakes? What does it do?

- Steve: Our understanding is that even if the ballot measure passes that this effort will continue. Senate Bill 375 is an independent statute, enacted separately, not covered by the express terms of the proposition. Now whether or not there will be litigation about that, I would probably bet you money there will. But at least our reading of the law is that this process will continue. At the very least I will tell you our process for adopting a regional transportation plan will continue because that's a long standing obligation. And I think the other point to make is that a lot of the programs and projects and strategies we are discussing here we have been pursuing for years, for other reasons, whether it's public health or mobility or livability and I think that work is going to continue as well. What's new here is this greenhouse gas overlay and a target from the state. That's what's new. But a lot of the guts of this is not and I think is going to continue either way.
- John: I was just going to ask Steve, what's the actual date that these targets need to be set?

Steve: September 30<sup>th</sup>

John: They need to be set by September 30<sup>th</sup>. So is it your sense that CARB is concerned that pushing too hard on some of these is going to play into the opponents? Clearly there's a political component going on here. Realistically I think that's what's at play.

Steve: Yup

Jim: Pass the mike to Jane.

- Jane: I just have a quick comment. In looking at the minutes I think we haven't captured the issue on pricing and I think that it's important that if we spend our time here and we actually make comments I'm not going to repeat my comments from last time, but I think there's been several people talking about pricing and we should make that clear in the minutes that that's not a full agreement.
- Jim: Okay. Scott?

### Scott: Steve, in reading the staff report, you mentioned and we had a little bit of discussion about SCAG being deeply divided. Did I hear you say that there's a possibility they may revisit their targets?

- Steve: I just talked to their Executive Director this morning. I don't think it's likely in fact that the SCAG board will act again or meet again before the 23<sup>rd</sup>. In taking the action they did they also sent CARB sort of a list of demands that maybe we'd be willing to go along with your targets if you met the following umptiump conditions and so my sense of it is that the contour of the debate before the CARB board is whether any of those conditions are things that CARB could get behind? For example, we could sure meet these targets easier if you stop stealing our transit money – things like that. Some of which I think you'd probably endorse wholeheartedly.
- Scott: That's a novel idea.
- Steve: So I think that is probably going to be the context for the debate. Should the board reduce the targets in response to what the elected officials in L.A. want? Or should they keep them where they are but try to respond to some of the, I think very legitimate concerns they have about other state policies that are running counter to this effort?
- Scott: The concern that I have is I actually had a CTC commission call me and basically want to know what it is that we're thinking here. You could probably figure out who it was. My thought is on this though is if San Joaquin County for example was able to lower their numbers and then for some reason maybe SCAG shows up at the board meeting and requests lower numbers and gets them, and then as we start moving down the road we don't start hitting our targets because we set higher ones - how does that affect us in relationship to our ability to get transportation projects? I view L.A. (sorry) I view them as a greedy group of people and if they could have every dime of transportation dollars down in L.A. they would be really happy. Actually they probably wouldn't be happy because then they'd want Nevada's money too. But I'm just saying to me I'm concerned that we've set the goals that I think we should set, but yet now we're seeing this splinter group go off and get lower numbers and possibly position themselves, and SCAG will probably realize this, that they positioned

themselves – "look at the Bay Area, they set these high numbers, they're not going to meet them. They're going to lose transportation dollars and now we get their money." And that could be an argument to set lower goals.

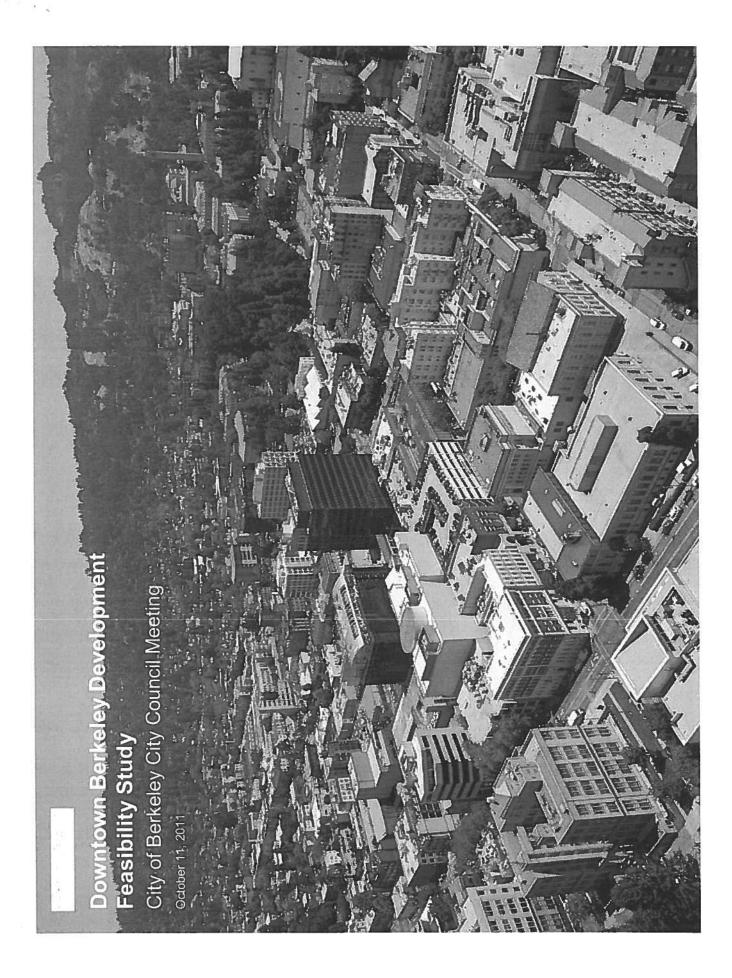
Steve: It could be. I think there's a little bit of reassurance in two respects. One is my understanding is L.A. Metro which is by far the largest transportation agency in that region is probably going to send CARB a letter supporting the targets. So the SCAG action to some extent was unrepresentative because as I understand it most of the L.A. members of the board were absent that day. Secondly, again, there is no requirement in the law that constrains your ability to decide how to meet the target. The state is going to set a target, but the field is pretty clear, wide open about how we go about doing it and it doesn't necessarily have to involve just infrastructure projects. In fact I think in this region it will involve a lot more besides that because as I think you all are aware we're spending 80% of our infrastructure money just taking care of the system we've built. So it's not like we've got a lot of expansion going on. It's precious little. And I don't think anyone is going to suggest we ought to stop maintaining our roads and transit systems. If anything we may have to spend more on it. So I think the debate here about how to meet the target is going to go much beyond a fight over this project versus that project. We'll have that, I'm sure. That's a perennial feature of our planning process. But I sure hope that's not all we do because we'll be missing the much larger share of the picture.

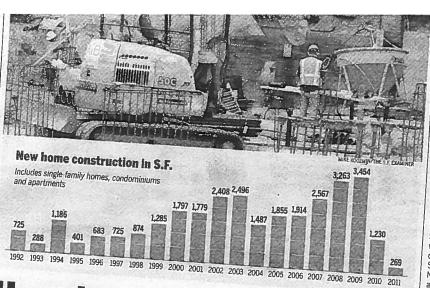
Jim: David Schonbrunn did you want to speak on this item?

David: Yes – David Schonbrunn, TRANSDEF – I wanted first off to agree very much with MTC's executive director on the issues of uniform targets for all of the state and in particular the need for a much more significant contribution from the San Joaquin Valley. This is very much heading in the wrong direction. But I wanted to add on to comments that I've made in earlier meetings about the absence of context in the previous target setting. What accompanied this staff report, partly as a result of requests that I made to ARB, they've produced a spreadsheet that shows the emissions and emissions reductions and as the MTC executive director said, the ARB AB32 scoping plan had initially set a target of 5 million metric tons. What was accomplished by these regional targets is 3.4 million metric tons. So what that's saying is that the SB375 draft targets don't meet the plan that was set and that scoping plan had a hole in it of 34 million metric tons where they couldn't find adequate reductions. The significance of this is that this is by no means aggressive, even though it's not necessarily easy to accomplish the targets that you've already set. Those targets themselves result in increases in overall emissions for the region, both in 2020 and in 2035. It's essentially a million metric tons in

2020 and then added to that is another million metric tons. So these targets, while challenging, don't actually even balance out the growth that's projected to occur here. I think it's important for you to have that in mind as you go forward that this is fairly weak when it comes to climate. I would respond to the people who are saying sorry folks we don't want to do it – you may be far inland in terms of rising sea levels, but we're seeing wildfires, catastrophes, flash floods – this is just the beginning of what climate change has in store and the people that don't choose to get on board now are going to cause everybody to suffer later.

- Jim: Thank you David. I'm going to take one more public comment and then your comment and then I'd like to move on to the next item before we run out of time.
- Mark: What's the relationship between the population coming from SCAG and the aid to San Joaquin Valley MPOs? Anybody have that roughly?
- Steve: Not off the top of my head. SCAG is what, 40% of the population of the state?
- F: Yes
- Mark: So the point then is that SCAG is much larger than the 8 San Joaquin Valley MPOs. Is that a true statement?
- Steve: Yes
- Mark: So if that's true I think all of our hand wringing about the Central Valley is somewhat misplaced. I think Scott was closer to the truth there if we're going to be saying anything at all and that is that SCAG can't be dropping down to 6 and 8. That's the bigger animal out there in the arena SCAG. That's who we need to be fortifying at CARB, that those figures cannot be going lower. The Central Valley, it's easy to pick on them on and on and on, but in relation to the overall picture that's not that big of a deal. We need to be pounding on SCAG that those numbers can't be going down to 6 and 8. If we're going to be saying anything to CARB that's what we need to be talking about.
- Jim: Thank you Mark. Let's move on to the Regional Housing Targets. Paul, are you going to present this item?
- Ezra: I'll introduce the item. We have two items on this report. Both of them relate to our ultimate...





### **Housing creation lagging** even as demand boomi

With just 269 units constructed last year, city hits 20-year low

### By Ari Burack S.F. Examiner Staff Writer

The economic downturn hit San Francisco homebuilding hard in 2011, choking off construction of new housing to the lowest level in at least 20 years, a new city report shows.

Even as a growing tech boom lured waves of residents to The City and drove housing prices skyward, San Francisco gained only 269 units of new housing last year — less than 8 percent of the houses, condos and rental units constructed in 2009, according to data from The City's

Planning Department. "We should be building between 3,000 and 5,000 units a year," said Gabriel Metcalf, executive director of the San Francisco Planning and Urban Research Association. "And if we want to actually be making this city more affordable for the middle class, we need to be producing more at the upper end of that range, for a sustained period of time."

Until last year, more than 1,200 housing units were built in The City every year since 1999 — an average of more than 2,100 units per year. As recently as 2009, 3,454 units were completed.

"I was actually surprised at how low the number was," said Olson Lee, director of the Mayor's Office of Housing. "Part of the slowness, in terms of completions, is really related to decisions made three or four years ago. On the market-rate side, obviously they took a dive when the market crashed."

According to data from the web-site Trulia, San Francisco's average rent has increased 13.2 percent since last year. The website RentBits says rental prices have surged almost

26 percent just since December. The City's housing goals are set by the Association of Bay Area Governments, which calls for nearly 31,200 new units — 60 percent affordable — to be built between 2007 and 2014. Through 2011, only about 12,830 units had been completed. And just 37 percent were affordable.

In fact, the amount of affordable housing built last year sunk 63 percent.

Ted Gullicksen of the San Francisco Tonants Union called the number "paltry," noting that other affordable units have been lost to demolition, evictions and condo

Funding for new affordable housing hit a wall last winter with the elimination of redevelopment agencies and federal cuts.

"We can't meet any of our goals without the adequate resources,"

Still, officials stressed the cyclical nature of the housing market. Lee said market-rate developers began work on some large projects last year, including condomini-ums in Mission Bay and two large downtown projects.

The Planning approved 57 projects in 2011 that Department propose to add more than 15,000 units to The City's housing stock, including the Treasure Island redevelopment and the Park Merced project.

Lee said The City has 9,000 more units of affordable housing "in the pipeline," but when they will be completed is uncertain because of funding uncertainties. Mayor Ed Lee. hopes to create a housing trust fund to assist renters and home buyers. Metcalf said the housing shortfall

is partly responsible for skyrock-eting rents. He warned that San Francisco is in danger of becoming "a playground for the rich ... unless we add much more to the housing supply."

aburack@sfexaminer.com

together to help the friendly homeless man who greets passers-by in North Beach after he was seriously injured in a hit-and-run last

weekend. People who wish to donate funds to Rowe and his family can call the North Beach branch of Citibank at (415) 362-8410 or visit the "Help Les" Facebook page.

### MARIELA CASTRO

The daughter of Cuban President Raul Castro was granted a U.S. visa Thursday to attend the Latin American Studies Association conference in San Francisco next



week. Mariela Castro, 50, is slated to discuss Cuba's policies on sexual issues She heads the communist nation's National Center for Sex Education and is an outspoken advocate for gay rights.



SAN JOSE

 A judge today is to consider the fate of dozens of paupers' graves unearthed by construclot of Santa Clara Valley Modical Center. The might contain as many asd/445 graves

### VISTA

VISTA • Dorothy Grace Maradino, an expectant moties; is the third suspect to plead not guilty to murder charges in the mysi-terious homicide April 18 of Brittany Killgore, 22, while Brittany Killgore, 22, while her husband, a Marine, was away'serving a tour of duty in Alghanistan.

### PACIFICA

A live Vietnam War-ero grenade was found in a party Altithorities determined the weapon was fully intact and operational, and it was safely disarmed by a bomb squad.

LOS ANGELES

• The USS jowa, which ferried • The USS jowa, which ferried President Franklin D. Roos-event across the perilous Atlantic Ocean waters to a bistorius meating with Unington historic meeting with Winston Churchill and Josef Stalin in the dark days of World War II, will be given a permanent mooring in the Southern California city. Whe report

SF Examiner Friday, May 12, 2012

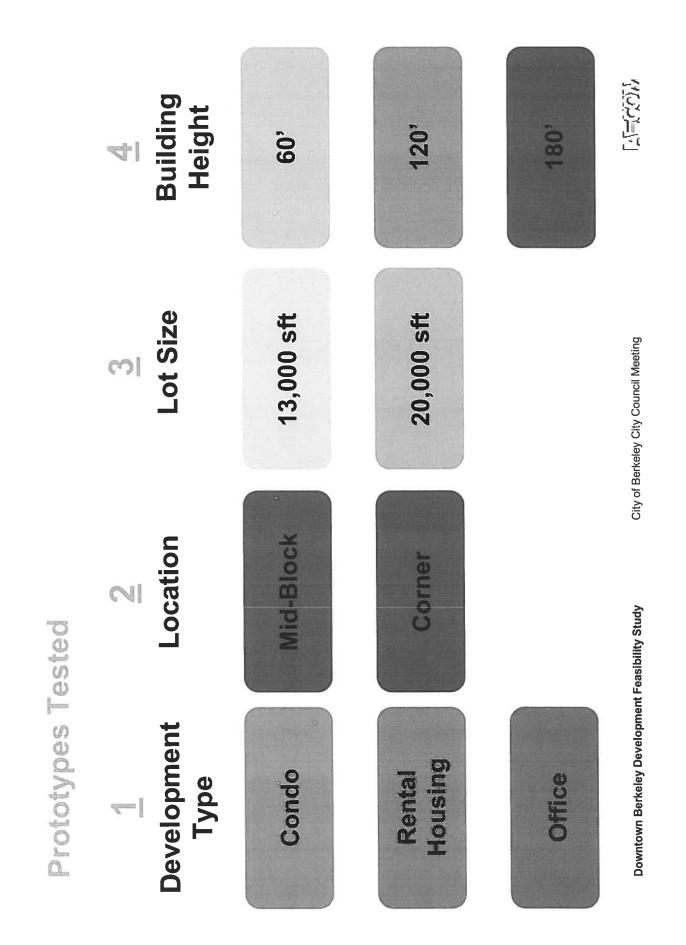
ABGOM City of Berkeley City Council Meeting Downtown Berkeley Development Feasibility Study Contents Assumptions Methodology Findings Purpose

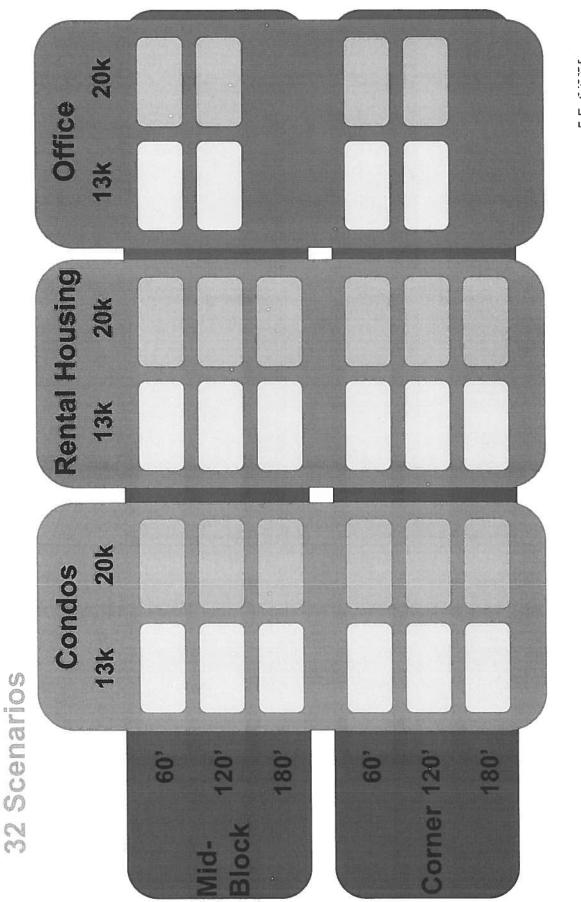
MEGOM City of Berkeley City Council Meeting Downtown Berkeley Development Feasibility Study Methodology <sup>1</sup> Assumptions Contents Purpose Findings

## Purpose of Study

- To inform policy debate on the extent to which new development can contribute financial resources to support a range of public benefit programs, while remaining financially viable.
- Policy makers have expressed interest in establishing impact fees for:
- Affordable housing
- Street and open space improvements
- Transportation demand management
- Parking

ABGOM City of Berkeley City Council Meeting Downtown Berkeley Development Feasibility Study Methodology Assumptions Contents Findings Purpose





YOU'L'

City of Berkeley City Council Meeting

Downtown Berkeley Development Feasibility Study

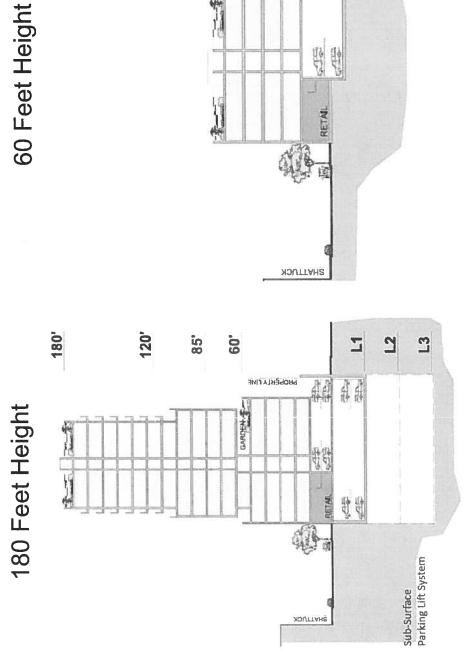
# Static Pro-Forma Analysis

- Feasibility analysis performed using static proformas
- A static pro-forma analysis estimates future cash flows based on stabilized point in time
- Results in net residual value of parcel
- Net residual value = Amount available to contribute to public benefits



Sample Development Scenario

20,000 SF Mid-Block Parcel



60'

10

BNIT ALBERTY LINE

Downtown Berkeley Development Feasibility Study

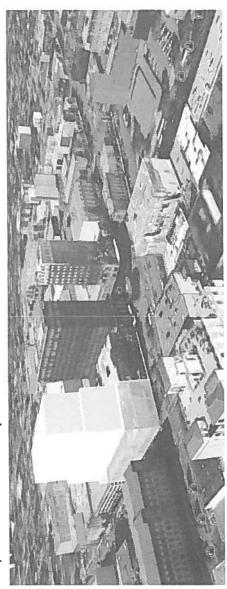
110211

## Sample Site Configuration

## 13,000 SF Development



## 20,000 SF Development



Downtown Berkeley Development Feasibility Study

City of Berkeley City Council Meeting

ABGOM City of Berkeley City Council Meeting Downtown Berkeley Development Feasibility Study Assumptions Methodology Contents Findings Purpose

tions	Inclusionary Housing	<ul> <li>20% of condo units</li> </ul>	\$20,000 per rental unit	Parking Requirements	<ul> <li>Rental residential = 0.33 space / unit</li> </ul>	<ul> <li>Condo = 0.8 space / unit</li> </ul>	<ul> <li>Office = 1 space / 1,000 SF</li> </ul>	<ul> <li>Retail = 1 space / 1,000 SF</li> </ul>	
Key Development Assumptions	Developer Land Cost and Return	<ul> <li>Land cost = \$100/SF</li> </ul>	<ul> <li>Developer profit = 8% of total cost before leverage provided</li> </ul>	by financing	<ul> <li>Market rents and sales prices</li> <li>as of Q1 2011</li> </ul>				

City of Berkeley City Council Meeting

### Land Cost

- Land cost = \$100/SF
- A nominal, baseline value
- Land values vary dramatically by site across Downtown Berkeley, and contingent on:
- Economic use
- Site configuration
- Zoning / Regulations
- Historic transactions have been higher, but include existing structures on-site
- to be from \$80 to \$200/SF in Downtown Berkeley In 2008, Strategic Economics found land prices •

いっとして

Revenue Assumptions

## Rental Housing

 Average rent per square foot is approximately \$3.35 per square foot of living area.

## Condominiums

- \$550 / Square Foot
- 5% View Premium on units located at heights between 60' and 120' •
- 10% View Premium on units located at heights between 120' and 180'

### Office

- \$3.00 / Sq. Ft. / Full Service
- Retail
- \$2.35 / Sq. Ft. Triple Net (NNN)

Downtown Berkeley Development Feasibility Study

City of Berkeley City Council Meeting



Public Benefit Fee Assumptions

### Adopted

- 20% inclusionary housing or in-lieu fee for condominium projects
- \$4/SF affordable housing mitigation fee for commercial space
- \$1/SF child care fee for commercial space

## Not Adopted (as of Oct 2011)

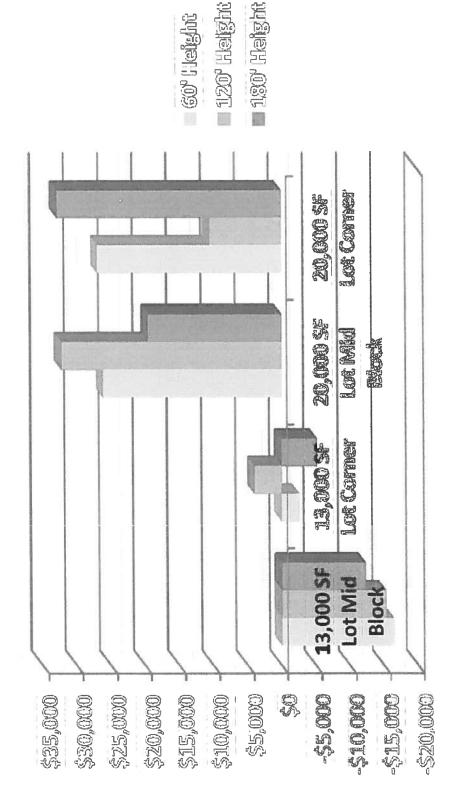
- Affordable housing mitigation fee for rental housing (proposed at \$20,000/unit)
- Parking in-lieu fee (proposed at \$35,000/space)

Downtown Berkeley Development Feasibility Study

City of Berkeley City Council Meeting

**ABGOM** City of Berkeley City Council Meeting Downtown Berkeley Development Feasibility Study Assumptions Contents Methodology Findings Purpose

Public Benefit Estimate for Rental Housing **Development in Downtown Berkeley** (Per Unit Estimate)

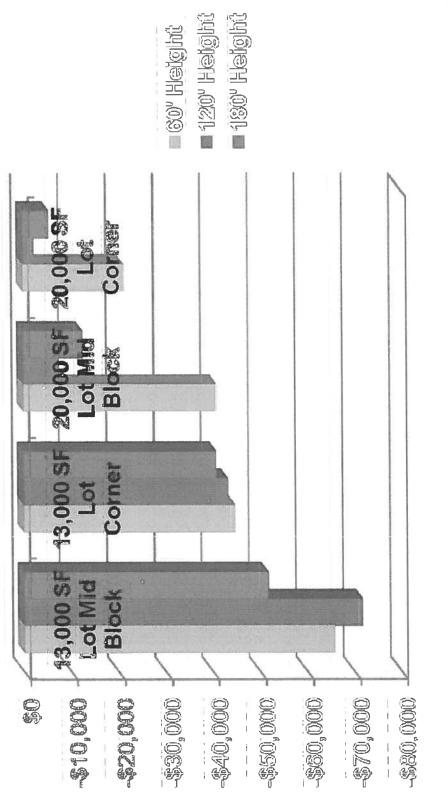


MONTY I

City of Berkeley City Council Meeting

Downtown Berkeley Development Feasibility Study

Public Benefit Estimate for Condo Development in Downtown Berkeley (Per Unit Estimate)

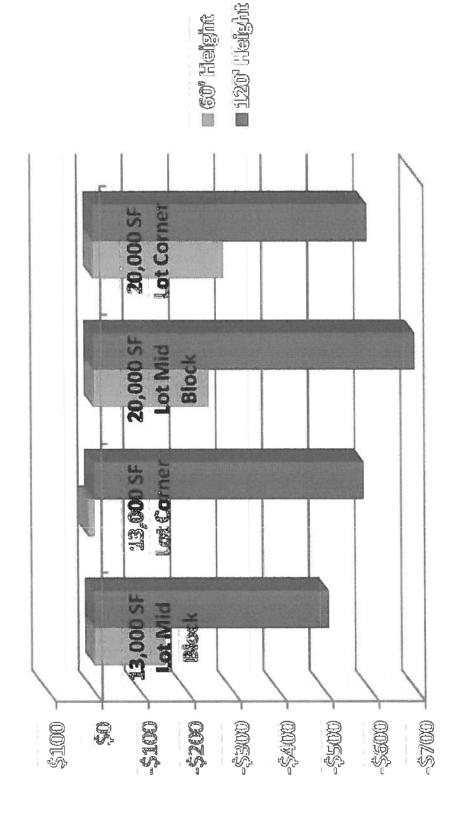


Downtown Berkeley Development Feasibility Study

City of Berkeley City Council Meeting

とのジェン

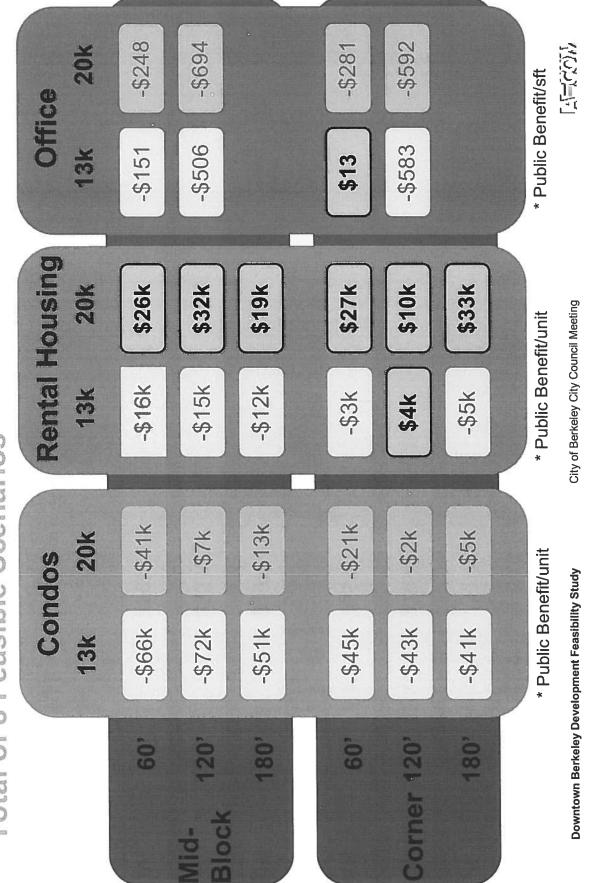
Public Benefit Estimate for Office Development in Downtown Berkeley (Per SF Estimate)



11021

City of Berkeley City Council Meeting

Downtown Berkeley Development Feasibility Study



Total of 8 Feasible Scenarios

Findings

### Land Use

Only rental housing shows financial feasibility

## Site Configuration

 Corner parcels more profitable than mid-block parcels

### Heights

 Mixed results – greater heights generally result in higher profitability

### Size

20,000 SF parcel significantly more profitable than 13,000 SF parcel

Downtown Berkeley Development Feasibility Study

City of Berkeley City Council Meeting

いっとして

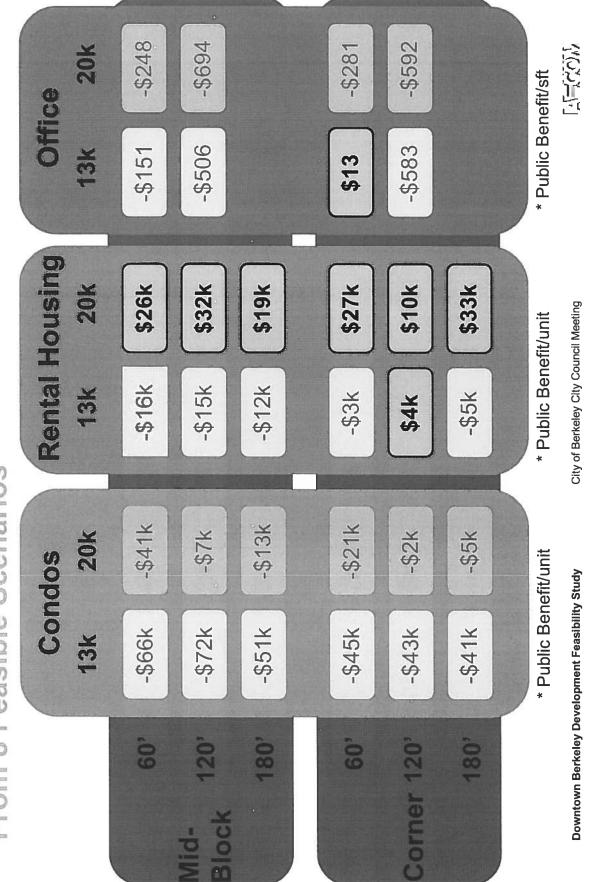
Land Costs

What happens when land costs increase from \$100/SF to \$200/SF?

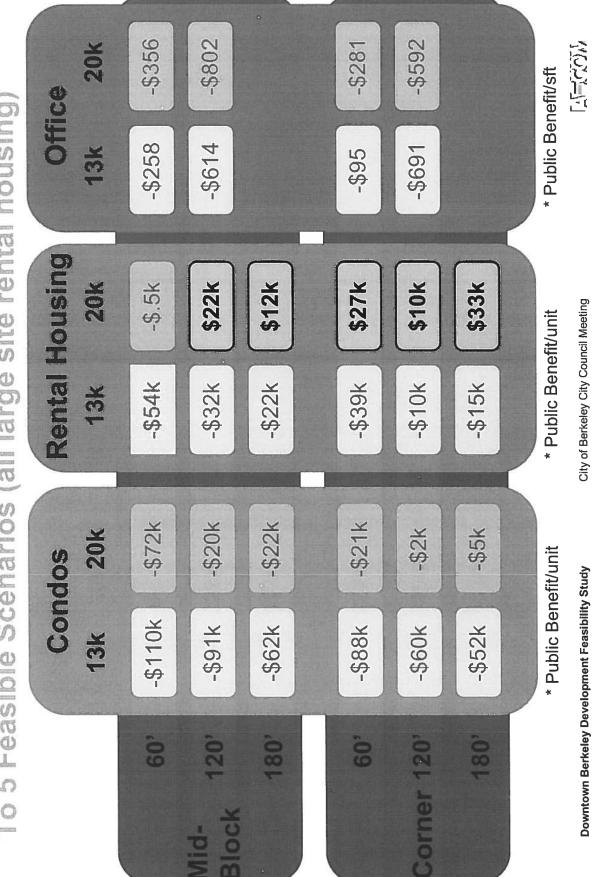
Downtown Berkeley Development Feasibility Study

City of Berkeley City Council Meeting

いっとして



From 8 Feasible Scenarios

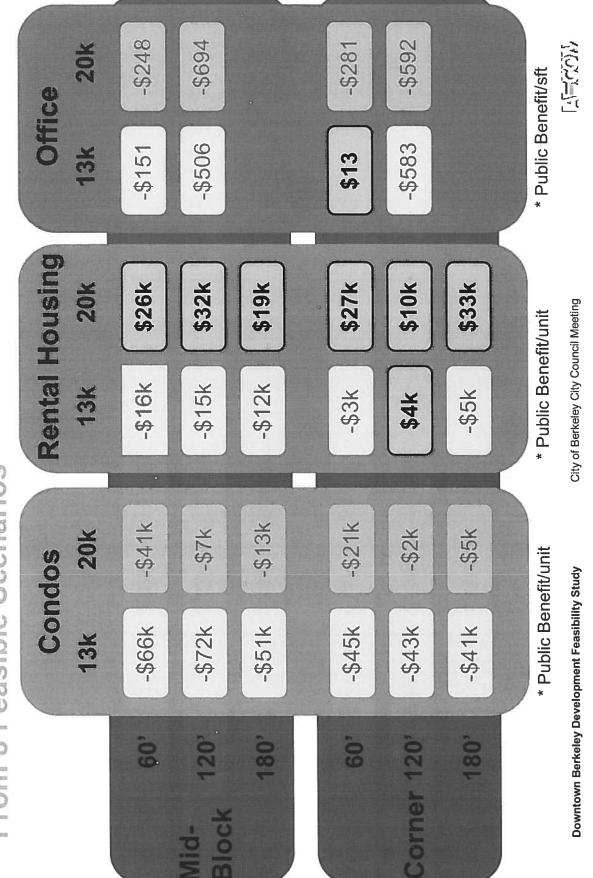


To 5 Feasible Scenarios (all large site rental housing)

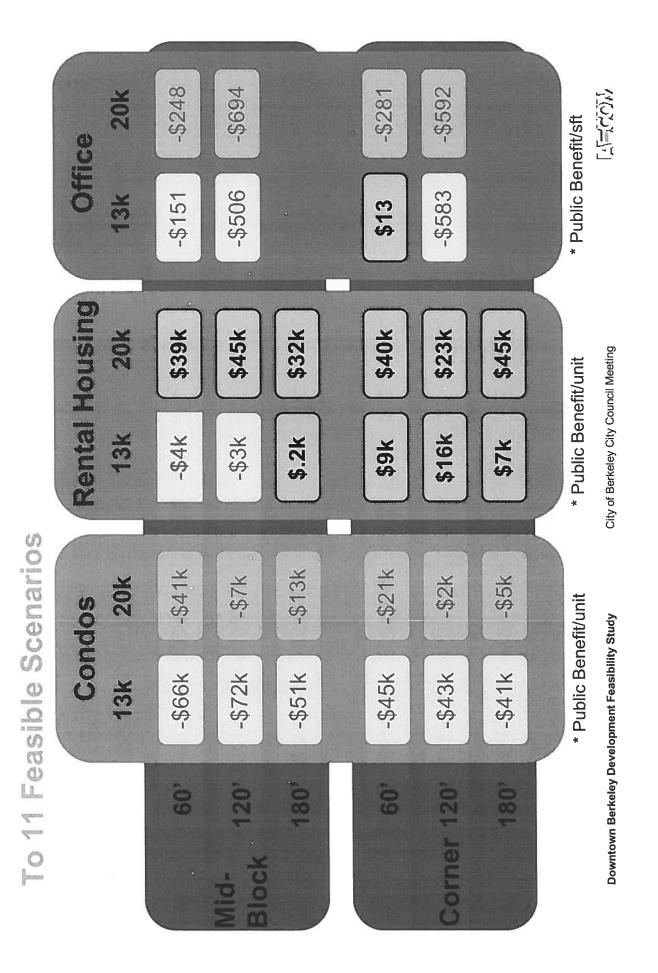
# Setting Public Benefit Fee Levels

- Setting public benefit fees at appropriate level is critical to facilitating more development, which in turn would generate more public benefit revenue potential
- housing mitigation fee is set to \$10,000 instead What happens when the rental affordable of \$20,000? •

MONTY-



From 8 Feasible Scenarios



City of Berkeley City Council Meeting

Downtown Berkeley Development Feasibility Study

Thank you! Q + A / Discussion

4

### One**BayArea**

Date:	November 23, 2010
To:	ABAG Regional Planning Committee
From:	Gillian Adams, ABAG Regional Planner Sailaja Kurella, ABAG Regional Planner Therese Trivedi, MTC Transportation Planner

Subject: PDA Assessment Input into the Sustainable Communities Strategy Vision Scenario

### Overview

ABAG and MTC expect the FOCUS Priority Development Areas (PDAs) to be the foundation for identifying areas of future population and employment growth in the Bay Area's Sustainable Communities Strategy (SCS). For this reason, we have undertaken an assessment of Planned PDAs to better understand the changes expected to occur and potential barriers to future development in these areas. The PDA Assessment focuses on the Planned PDAs, which, by designation, have an adopted neighborhood-level plan and are therefore closer to implementing a specific vision for growth than the Potential PDAs.

The main purpose of the PDA Assessment is to identify the areas that are most ready to accommodate significant additional growth in ways that will create complete communities as well as the policies and resources needed to make that growth a reality. Using information primarily provided by local governments, the assessment will evaluate the scale and type of growth planned to occur in Planned PDAs, the strategies needed to ensure that this growth results in complete communities, how ready local governments and communities are for growth to occur, and the investments needed to support this growth.

This information will be used to help shape the scenarios that are developed as part of the SCS process, and to inform efforts to implement the growth planned in the PDAs. It will also help MTC and ABAG to allocate resources available through regional funding programs and prioritize additional funding to the PDAs through the SCS.

### Approach

ABAG and MTC have developed a framework for utilizing key PDA Assessment factors to inform the initial Vision Scenario of the SCS. While the PDA Assessment evaluates a wide range of factors related to Growth, Need, Readiness, and Completeness, this framework for input into the initial Vision Scenario focuses on those pieces of data that are likely to have the most significant impact on land use patterns and the potential to meet the housing and greenhouse gas targets of the SCS. This framework will help us determine where best to allocate household growth in the region's P anned PDAs.

The more comprehensive PDA Assessment (expected to be completed in Spring 2011) will include additional metrics for assessing potential development, and will also explore the incentives, resources, and policies that are needed to support additional growth. This analysis will inform the SCS detailed scenarios and the regional agencies' ongoing efforts to develop a package of incentives and policies to help local governments to accommodate growth in ways that will improve the overall quality of life for their communities and reduce greenhouse gas (GHG) emissions related to automobiles and light trucks.

The approach for informing the initial SCS Vision Scenario consists of four "filters", and related metrics, that identify the areas that are more suitable for future growth. Input from the PDA Assessment will be one of several factors that influence the growth distributions in the initial Vision

Scenario, along with information provided by local governments through the county/corridor engagement process and an analysis of local market conditions. More broadly, the analysis will also be used to assess the accuracy of the land use scenarios forecast as part of the SCS, as well as identify specific policy levers that can serve to support growth in the PDAs.

The four filters that are the foundation of the Assessment framework are: Location, Planned Growth, Readiness for Implementation, and Completeness. Table 1 lists the specific metrics proposed for each filter. The filters are described in more detail below.

Table 1: PDA Assessment Input into the initial Vision Scenario	
Filter 1: Location	
Transit access	
Transit type and frequency	
Proximity to existing jobs	
Total jobs within 30 minutes by transit and auto	
Filter 2: Planned Growth	
Planned change in total housing units	
Total additional housing units	
Percent change in housing units	
Planned housing densities	
Minimum and maximum allowable zoning densities, by Place Type	
Gross future housing densities  Planned affordable housing units	
Jurisdiction's Regional Housing Need Allocation (RHNA), if Housing Element certified by the	
California Department of Housing and Community Development (HCD)	
Affordable units planned in PDA	
Percent of RHNA allocation accommodated in PDA	
Filter 3: Readiness for Implementation	
Planning completed to date	
Specific Plan or other area plan (neighborhood/precise plan) adopted	
Programmatic EIR for primary PDA-plan adopted	
Zoning code amendments adopted	
General Plan amendments adopted	
Ease of entitlements	
Total processing time	
Streamlining policies in place	
Development fees	
Investment attraction	
Pipeline projects – total number of units approved and entitled	
Filter 4: Completeness	
Housing choices	
<ul> <li>Existing housing variety, based on unit type, unit size, and tenure</li> </ul>	
<ul> <li>Existing combined housing and transportation costs</li> </ul>	
A comparison of PDA housing costs to the earnings available for jobs within a 30-minute cor	nmute
Walkability	
<ul> <li>Pedestrian access to major destinations, based on MTC's Walkability Index</li> </ul>	
Parks	
Park acres per capita	
<ul> <li>Proportion of residents within walking distance of a park</li> </ul>	
Schools	
Access (walking and transit)	
Quality	

### Filter 1: Location

One of the primary strategies for meeting the SCS' goal of reducing the emission of greenhouse gases from personal vehicles is for people to drive less. The primary factor that influences the extent to which residents and workers in an area can reduce their vehicle miles traveled (VMT) is that area's location within the region. Specifically, those areas that are near transit—particularly areas with frequent transit service—provide travelers with an alternative to driving. Thus, the first step in the framework for distributing housing growth is to direct it to areas that have frequent transit service, to give residents the greatest opportunity to reduce their VMT by choosing transit instead of driving. Housing growth in PDAs that have rail service with 15-minute headways during commute hours or bus, ferry, or light rail service with 20-minute headways during commute hours would have a better chance of resulting in lower VMT than in PDAs with less frequent transit service.

Another strategy for reducing individuals' VMT is to have homes and jobs located close to one another. Ideally, most of the region's future household growth would be located within a short distance of one of the region's employment centers, to enable shorter commutes. For this reason, we have included proximity to jobs as a second factor to consider as part of the Location filter. Those PDAs with the highest number of jobs within 30 minutes—by either auto or transit—would be considered locations where growth would more likely result in lower VMT, given appropriate support to improve transit service and overall quality of life in these areas.

### Filter 2: Planned Growth

The second filter is related to the amount and type of growth that is expected in the Planned PDAs. In the Planned PDAs, local governments have already identified opportunities for future growth, and are working to accommodate that growth. For this reason, the growth planned in these areas is the most likely to occur during the horizon of the SCS. The metrics would include the total number of additional units planned in the PDA as well as the percent change in housing units, to account for jurisdictions of different size.

Another factor related to planned growth included in the input into the initial Vision Scenario is future residential density. In general, those areas with higher future densities are planning for the type of compact growth most likely to contribute to reductions in driving, and the associated greenhouse gas emissions. Thus, a PDA that is planning for densities that are appropriate for its designated Place Type<sup>1</sup> would be considered a more appropriate location for growth.

A final component of planned growth to be considered is the extent to which the PDA is planning to provide housing choices for all income groups—one of the statutory targets for the SCS and a key attribute of a complete community as defined by the FOCUS Program. To assess the extent to which PDAs are planning for affordable housing, we look at the number of affordable units included in the PDA plan, the PDA jurisdiction's total Regional Housing Needs Allocation (RHNA), whether or not the jurisdiction has a certified Housing Element, and how much of the RHNA is expected to be accommodated in the PDA. Based on these factors, those PDAs that are planning for the most affordable housing would play a major role in addressing the statutory target of the SCS.

<sup>&</sup>lt;sup>1</sup> Each Planned PDA was asked to designate a future Place Type using the typology described in MTC's *Station Area Planning Manual* (October 2007). There are seven different Place Types that are defined based on the characteristics of an area, such as the transit mode, land use mix and density, and the area's role within the region, with regard to employment, retail, and housing.

### Filter 3: Readiness for Implementation

The third filter, implementation readiness, attempts to gauge which PDAs are more poised for higher-density, transit-oriented growth by identifying those factors that are barriers to development as well as those that are critical for initiating or speeding implementation of Planned PDAs. Specifically, this filter is intended to show: (1) how complete and robust the plans are for each PDA, (2) how the existing entitlement process in a PDA affects implementation, and (3) the potential interest of developers, builders, and financial institutions to invest in a PDA. Analysis of the specific planning and entitlement processes in each PDA will help to identify where developers can have more certainty in terms of the vision for the area, the approval process, and the communities expectations. Likewise, assessing current developer interest in a PDA can provide an indication of the development community's appetite for investing in infill development within the PDAs in the future. In the PDAs where development is streamlined and where developers have shown interest in investing, growth is more likely to occur in the short term. These PDAs, therefore, would be considered to be more ready to take on the levels of growth specified by the SCS. A PDA that is considered more ready for implementation would receive a higher growth allocation.

We anticipate that the first metric, the degree and comprehensiveness of planning completed to address development challenges, will be assessed by determining whether a specific or other neighborhood-level plan, programmatic EIR, zoning code amendments, and general plan amendments have been adopted for the PDA. The second metric, ease of entitlements, could be measured by the total processing time for entitlements, entitlement streamlining policies in place, as well as the level of total development fees in the PDA. The final planning and entitlement metrics are still to be determined based on discussion with both local planners and developer focus groups.

The last component of readiness to be considered is the extent to which developers, builders and financial institutions have shown interest in investing in a given PDA. This would be measured based on the total number of housing units or commercial square feet within current pipeline projects in the PDA.

### Filter 4: Completeness

One of the primary goals of the SCS is to promote development in the PDAs that contributes to the creation of complete communities and support local jurisdictions that are addressing sustainable development challenges. The PDAs are areas that welcome more residents and are committed to offering options for everyone: a variety of homes, jobs, shops, services and amenities close to rail stations, ferry terminals, or bus stops. Thus, the completeness filter includes metrics related to housing and transportation choices and access to parks and schools.

To assess the housing choices within a PDA, we propose to review the diversity of the area's existing housing stock, based on housing type, unit size, and tenure. We will also look at the combined housing and transportation costs for households in the PDA, to evaluate the overall affordability of the PDA. As another measure of affordability, we will assess whether or not the jobs within a 30-minute commute of the PDA provide salaries that match the costs of the housing in the area.

Another key component of completeness is whether there are a variety of transportation options in an area. The Location Filter takes into account if a PDA has frequent transit service. As part of this filter, we will assess the number of businesses in the PDA that can easily be accessed on foot, using MTC's Walkability Index.

Since parks play an important role in contributing to the quality of life in a community, we will look at whether PDA residents can easily access a park. This will be measured by the acres of parks per capita, and the proportion of residents that are within ½ mile of a park.

Finally, schools are an important factor in regional land use and transportation patterns, as 12 percent of all trips made in the Bay Area are school-based. Schools also play an important role in community building, and are a major determinant of households' location decisions. Access to high quality schools – defined by both the educational quality of school programs and a school's role as a local, place-based community asset – are key metrics for assessing completeness. School quality will be measured based on school, student, and staff characteristics, as well as school performance. School accessibility will be measured by identifying the number/proportion of schools that are accessible by either walking or taking transit.

While these characteristics are important in evaluating the quality of a place, it is more challenging to determine how they should be used as factors for distributing growth. For example, although some PDAs may have better housing choices now, it is desirable that, over time, all of the PDAs will meet this goal. Future growth could go to the places where housing choices are already good, or alternatively, to the places where additional housing growth might diversify the housing stock. Thus, this filter may be better suited for identifying the areas that may not yet have the appropriate qualities and services to accommodate future growth, face challenges in meeting completeness goals, and need additional attention or resources.

### **Growth Distribution Performance and Policy Levers**

Assessing all of the Planned PDAs across these metrics will help to identify the most suitable places for accommodating future growth in the near term and what policy support is needed for those areas that are less ready to accommodate additional growth at this time.

The performance of each PDA will be established based on specific thresholds for each of the metrics that we will develop and refine in the coming weeks. These thresholds will vary for each metric, and will define "high", "moderate", and "low" ranges. The whole range of metrics proposed in the four filters will be evaluated to identify which PDAs are more suitable for future growth. In general, those Planned PDAs with overall "high" performance across filters and metrics would be considered better locations for growth in the immediate future.

Analyzing the PDAs across these metrics provides a useful tool to identify specific policy "levers"<sup>2</sup> to support development of complete communities. It is unlikely that any of the Planned PDAs will score high on all twelve of these metrics. Thus, each of these metrics could be considered levers that, with the appropriate support, can be shifted over time. For example, a PDA that demonstrates "high" planned growth but "low" performance in other metrics would indicate the potential for the PDA to accommodate growth in the medium or long term assuming appropriate support is provided. Table 2 shows how the metrics will be assembled to describe the various qualities of each PDA and which policy levers need to be applied to enable the PDA to accommodate additional growth and move toward becoming a complete community.

<sup>&</sup>lt;sup>2</sup> Twin Cities CTLUS Initiative/Identifying and Evaluating Regionally Significant Walkable Urban Places (2009), from the Center for Transit-Oriented Development sets forth a framework of "levers" that is used as a model for this PDA Assessment Vision Scenario framework.

	Loca	ation	Plar	nned Gro	wth	Re	adiness		C	omple	teness	
Planned PDA	Transit Access	Proximity to Existing Jobs	Housing Unit Growth	Future Residential Density	Planned Affordable Housing Units	Planning Completed to Date	Ease of Entitlements	Investment Attraction	Housing Choices	Walkability	Parks	Schools
PDA 1	High	Low	High	High	High	Moderate	High	High	High	Low	High	Low
PDA 2	Moderate	Moderate	Moderate	Moderate	Low	High	High	High	Moderate	High	Noderate	High
PDA 3	High	High	High	Moderate	Moderate	Low	Moderate	Low	High	High	Noderate	Low

### Table 2: PDA Assessment Vision Scenario Growth Distribution Performance & Policy Levers

### **Next Steps**

Over the next month, we will develop and refine scoring thresholds for each of the metrics described above and will continue to analyze the PDA data. The threshold methodology will be applied to the data to determine how each Planned PDA performs within each of the twelve metrics defined.

After reviewing the data, we will determine which of the following metrics might be used as input into the growth allocation model, as well as identify the policy levers that the regional agencies should focus on to support sustainable growth and development of complete communities in the PDAs.

### Key Questions for the RPC

- 1. Do these filters and metrics provide an appropriate framework to inform the distribution of household growth?
- 2. Which filters or metrics can provide most appropriate guidance for the Sustainable Communities Strategy?

From: FOCUS [mailto:FOCUS@abag.ca.gov]
Sent: Friday, September 11, 2009 5:59 PM
To: FOCUS
Subject: Save the Date - FOCUS Workshop on PDAs and the SustainableCommunities Strategy

### Save the Date!

### FOCUS Workshop

### PDA Assessment: A Building Block for the Sustainable Communities Strategy

### Friday, October 2, 2009

### 9:30 a.m. - 12:30 p.m.

Please save the date for an important workshop on October 2<sup>nd</sup> related to the development of a comprehensive assessment of the FOCUS Priority Development Areas.

The FOCUS Priority Development Areas (PDAs) will be a key consideration for the development and adoption of the Sustainable Communities Strategy (SCS) for the region under the recent SB 375 legislation. A comprehensive assessment of the PDAs will be one building block of the SCS.

This assessment will provide a deeper understanding of growth and development opportunities in the PDAs and inform and influence regional growth scenarios, resource allocations, and policies to support focused growth.

We are seeking input from planning, public works, congestion management agency and transit agency directors, and regional stakeholders on the opportunities and constraints you face in developing PDAs as complete communities. Your participation in this meeting will frame the PDA Assessment study and will lay the groundwork for regional collaboration on this landmark SCS planning effort.

We will soon provide venue and registration information. For more details please contact Gillian Adams at 510 464-7911 or <u>ailliana@abaa.ca.gov</u>.

### ASSOCIATION OF BAY AREA GOVERNMENTS Representing City and County Governments of the San Francisco Bay Area

Date:	September 27, 2010
To:	ABAG Regional Planning Committee
From:	Gillian Adams, ABAG Regional Planner Sailaja Kurella, ABAG Regional Planner
Subject:	<u>Planned Priority Development Area Assessment – Planned Growth &amp;</u> <u>Infrastructure Needs</u>

### Overview

The Association of Bay Area Governments (ABAG) and the Metropolitan Transportation Commission (MTC) approach the implementation of the FOCUS Priority Development Areas (PDAs) as a key consideration for the development and adoption of the Sustainable Communities Strategy (SCS) under SB375. The designation of PDAs as a network of neighborhoods that will accommodate the majority of the region's population and employment growth calls for a thorough understanding of the changes expected to occur in these areas and potential barriers to future development.

MEI

To accomplish this goal, ABAG and MTC have undertaken an assessment of Planned PDAs, since Planned PDAs have an adopted neighborhood-level land use plan, and thus are closer to implementing a specific vision for growth. Potential PDAs are those that have not yet completed a neighborhood-level land use plan. Over time, it is expected that the Potential PDAs will complete plans and transition to Planned status.

This memo describes the purpose and approach for the PDA Assessment, and provides initial findings related to planned growth and infrastructure needs in the Planned PDAs.

### **Purpose and Rationale of PDA Assessment**

The two primary goals of the PDA Assessment are to gain information about Planned PDAs in order to help hasten development of these areas as complete communities and to support the development of a realistic SCS. While all of the Planned PDAs have been proposed by local jurisdictions committed to sustainable transit-oriented development through local plans, they vary greatly in their visions of complete communities and readiness to produce new housing.

Using information primarily provided by local governments, the assessment will evaluate the scale and type of growth planned to occur in Planned PDAs, the strategies needed to ensure that this growth results in complete communities, how ready local governments and communities are for growth to occur, and the investments needed to make this growth a reality. The desired outcomes of the assessment are to identify the PDAs most ready for implementation and growth potential, identify policies and resources needed to support essential elements of complete communities, and consider policies for prioritizing additional funding to the PDAs via the SCS. The Assessment may additionally assist the Potential PDAs by identifying strategies and policies to facilitate plan implementation.

PDA Assessment – Planned Growth & Infrastructure Needs ABAG Regional Planning Committee, October 2010 Page 2

### **Assessment Approach**

The information to be used in the PDA Assessment has been gathered from our local government partners through one-on-one meetings with local city staff and an extensive survey. This information will be complemented by data from other sources, such as the U.S. Census. The assessment is organized around four main topics related to future development in the Planned PDAs:

- The *Growth Potential* assessment looks at amount and type of growth planned in the PDAs.
- The *Need* assessment evaluates the amount of types of funding that the PDAs need to achieve their desired growth. It also identifies policy changes needed to support growth in the PDAs.
- The *Readiness* assessment will gauge which PDAs are ready for higher-density, transit-oriented development. This analysis will focus on funding needs, entitlement process, transit capacity and connectivity, community support, and implementation feasibility.
- The *Completeness* assessment evaluates local plans and community characteristics to determine the extent to which PDAs are poised to become complete communities. This analysis focuses on housing choices, multi-modal access and mobility, and neighborhood identity and vitality.

### **Preliminary Findings**

The summaries of data presented below are based on responses provided by local jurisdictions to the Assessment Survey of Planned PDAs.

### **Planned Growth**

The PDA Survey indicates that Planned PDAs in the Bay Area expect to add approximately 209,000 housing units and 607,000 jobs over the next 25 years. As a result, in 2035 there are anticipated to be nearly 579,000 housing units and 1.6 million jobs in the region's Planned PDAs. These numbers indicate that, while the 92 Planned PDAs included in this assessment account for a little over one percent of the land area of the Bay Area, they are planning to accommodate 32 percent of the housing growth and 37 percent of the job growth forecasted in ABAG's *Projections and Priorities 2009: Building Momentam*. Based on this data, jurisdictions are clearly expecting a high number of jobs relative to new housing in their Planned PDAs. This reflects a general pattern over recent decades where local jurisdictions plan for more jobs than the number that are ultimately produced.

The three counties planning for the most housing growth in Planned PDAs—based on total units added and the county's share of the region's total growth—are San Francisco, Alameda, and Contra Costa Counties, while the top three counties for job growth are San Francisco, Santa Clara, and Alameda.

By 2035, 37 percent of the region's housing units in Planned PDAs will be in San Francisco, down from 41 percent in 2010. Contra Costa County Planned PDAs are planning for the largest increase in the share of the region's total housing in Planned PDAs, moving from 7 percent in 2010 to 10 percent in 2035. San Francisco will see a 4 percent decline in their share of the region's total jobs in Planned PDAs, from 47 percent to 43 percent, while Santa Clara County's share will increase from 13 percent to 17 percent.

Table 1 provides a summary of the planned housing and job growth by county in the Planned PDAs

### Infrastructure Need

Preliminary analysis of the budget data from the PDA Assessment Surveys indicate that the capital infrastructure needs in the Planned PDAs total \$14.7 billion. The highest categories of capital needs for the Planned PDAs include affordable housing (\$2.5 billion), station improvements (\$2.5 billion), and parks (\$1.7 billion). Transit capital projects, such as BART expansion, bus rapid transit, and ferry system projects, were not included in the infrastructure needs analysis. However, it is important to note that a mix of transit expansion, rehabilitation and capacity improvement projects will be critical to supporting

PDA Assessment – Planned Growth & Infrastructure Needs ABAG Regional Planning Committee, October 2010 Page 3

growth in these PDAs. MTC's Resolution 3434 identifies a number of these critical transit improvements for which funding has been committed. Table 2 provides a summary of capital needs by category.

As expected, the highest capital needs for Planned PDAs by county occur where the greatest growth is planned – San Francisco, Santa Clara, Alameda, and Contra Costa Counties. The highest capital needs are estimated for the San Jose Central and North Consolidated PDA and San Francisco's Treasure Island and Bayview/Hunters Point Shipyard/Candlestick Point PDAs, each with over \$1 billion in infrastructure needs.

We have consistently heard that many jurisdictions require major public investments in infrastructure in order to stimulate significant new housing growth within their PDAs. To understand the variation of the <u>public</u> investments that will generate <u>private</u> investment in each of the PDAs, an analysis of the capital infrastructure needs identified relative to the number of new housing units planned in each PDA was performed. This metric is only rough comparative tool, and does not include the cost of constructing new housing in the PDAs. Given the planned growth in the Planned PDAs and the estimated capital infrastructure needs, the estimated public infrastructure investment that would be needed to spur private investment in new housing in the planned PDAs is approximately \$70,000/new housing unit. Santa Clara County has the highest capital infrastructure need per new unit, at approximately \$131,000/new housing unit, while Contra Costa County has the lowest capital infrastructure need per new unit, at \$38,000/new housing unit.

Table 3 shows the variation of capital infrastructure needs compared with housing growth across the counties.

### **Next Steps**

Over the coming months, additional growth and need findings will be presented at the county-level SCS meetings, with the intention of informing the SCS base case modeling scenario and growth allocation discussions. Staff will also analyze the readiness and complete community characteristics of the Planned PDAs. The framework related to readiness and completeness factors will be presented to the Regional Advisory Working Group. A final report linking together the analyses of growth, need, readiness and completeness in the Planned PDAs will be produced, which will help inform discussion on how we might approach regional funding strategies as part of developing the SCS.

PDA Assessment - Planned Growth & Infrastructure Needs
ABAG Regional Planning Committee, October 2010
Page 4

.

County <sup>i, II</sup>
by
Growth
PDA
Planned
<b>Table</b>

Countri	Existing Units (2010)	Fature Units (2035)	Change In Units (2010-2035)	Share of Total Planned PDA Housing Growth	Share of Total Planned PDA Housing (2010)	Share of Total Planned PDA Housing (2035)	Existing Jobs (2010)	Future Jobs (2035) <sup>1</sup>	Change in Jobs (2010-2035)	Share of Total Planned PDA Job Growth	Share of Total Planned PDA Jobs (2010)	Share of Total Planned PDA Jobs (2035)
Alomodo	R0 51R	140.067	50 549	24%	24%	24%	228.845	335,839	106,994	18%	22%	20%
Atalijeua Contra Costa	25.428	60.095	34.667	16%	%2	10%	76,272	124,236	47,965	8%	7%	8%
Marin	22, 22	4 363	1.586	1%	1%	1%	12,494	15,405	2,911	%0	1%	1%
San Franciero	152 389	215.907	63.518	30%	41%	37%	495,542	715,090	219,548	36%	48%	43%
Con Motoo	21 475	39.096	17.621	8%	6%	%2	57,099	121,046	63,947	11%	5%	%2
Santa Clara	67.023	97.244	30.221	14%	18%	17%	131,357	276,332	144,975	24%	13%	17%
Solano	4,460	9.036	4,576	2%	1%	2%	10,621	17,220	6,599	1%	1%	1%
Sonoma	6.824	14.357	7,533	4%	2%	2%	29,899	45,333	15,434	3%	3%	3%
Total	369.893	580.164	210,271	100%	100%	100%	1,042,128	1,650,501	608,373	100%	100%	100%

## Table 2: Total Regional Planned PDA Capital Need by Category<sup>III</sup>

ALL PLANNED PDAS	Total Cap (\$ N	iotal Capital Need (\$ MM)	Category % of Total Need <sup>2</sup>	Costs (\$ MM)	s MM)	Total % Funded
Total Regional Infrastructure Need	÷	14,712		\$	2,743	21%
Affordable Housing	63	2,542	19%	63	535	21%
Connectivity Projects	63	518	4%	\$	96	19%
Environmental Clean-up	69.	37	%0	63	2	6%
Land Assembly / Site Acquisition / Land Banking	\$	724	5%	\$	670	93%
Non-Transportation Infrastructure / Utilities	69	1,282	10%	69	317	25%
Parking Structures	69	395	3%	69.	67	24%
Parks	69	1,734	13%	\$	330	19%
Public Facilities	69	1,073	8%	69	223	21%
Road Improvements	63	1,653	13%	69	133	8%
Shuttles & Other Public Transportation	63	805	6%	63		%0
Station Improvements	63	2,467	7%	65	32	3%
Streetscape Improvements	69	920	2%	69	123	13%
Transnortation Damand Management	5	65	%0	3	61	03%
	÷	VOV	707	5	'	0%0

PDA Assessment – Planned Growth & Infrastructure Needs ABAG Regional Planning Committee, October 2010 Page 5

.

County County Alameda Contra Costa Marin San Francisco San Mateo Santa Clara			Planned DD.4	of af Tatal Diamad	Control Nood/Nove
	Change in Units (2010-2035)	Housing Growth	Capital Need (\$M)	PDA Capital Need	Housing Unit (\$)
Contra Costa Marin San Francisco Santa Clara	50,549	24%	\$2,969	20%	\$58,743
Marin San Francisco San Mateo Santa Clara	34,667	17%	\$1,302	6%	\$37,544
San Francisco San Mateo Santa Clara	1,586	1%	\$157	1%	\$99,190
San Mateo Santa Clara	63,518	30%	\$4,990	34%	\$78,554
Santa Clara	16,411	8%	\$737	5%	\$41,804
	30,221	14%	\$3,947	27%	\$130,613
Solano	4,576	2%	\$180	1%	\$39,333
Sonoma	7,533	4%	\$430	3%	\$57,093
Total	209,061	100%	\$14,712	100%	\$69,966

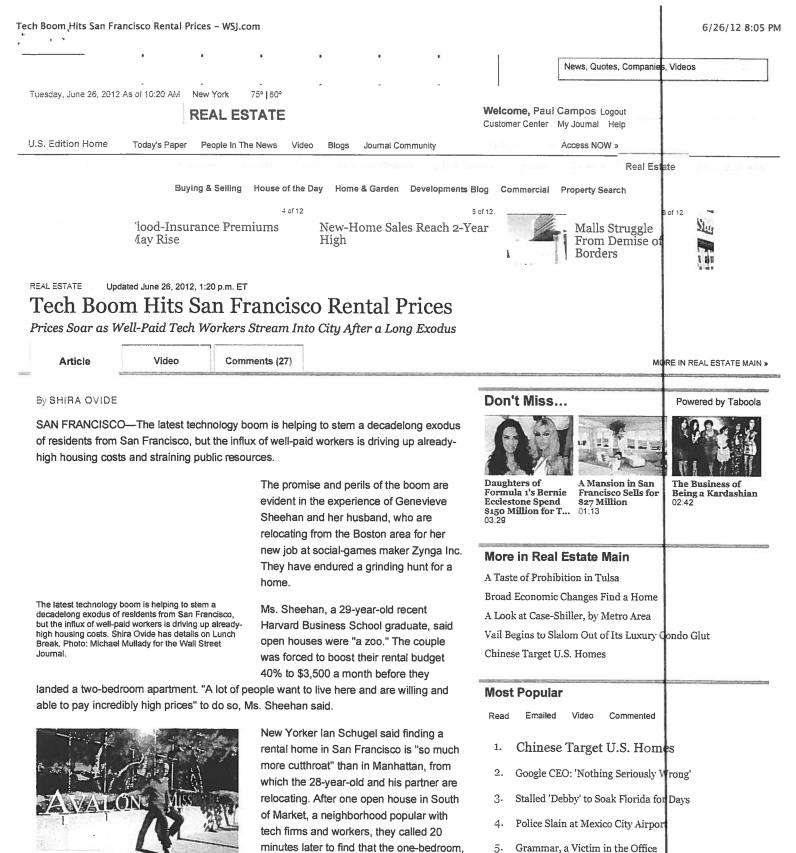
# Table 3: Planned PDA Growth and Capital Infrastructure Needs by County $^{\rm iv}$

No PDA Assessment Survey was received for the following PDAs: Alameda Naval Air Station; Hayward Cannery, Downtown, and South Hayward BART; and San Leandro Downtown TOD and East 14<sup>th</sup> Street, El Cerrito San Pablo Avenue Corridor, WCCTAC San Pablo Avenue Corridor, San Francisco Port, Campbell Central Redevelopment Area, Gilroy Downtown Specific Plan Area, Fairfiled Downtown South/Jefferson Street/Union Avenue, Suisun City Downtown Waterfront District, Vacaville Allison Policy Plan Area, and Santa Rosa Sebastapol Road Corridor. Growth data from PDA Applications was substituted where available.

Projections 2009 growth data was used where PDA Application data was not available.

<sup>&</sup>quot; If a jurisdiction reported a planning horizon for their PDA that was not 2035, growth figures were extrapolated to 2035.

Mateo County (unincorporated Colma) El Camino Real, San Jose Central/North Consolidated Area and Cottle Transit Village, Vallejo Waterfront and Downtown, and Windsor Redevelopment Project Area. Budget data from PDA Applications was substituted where available for survey non-respondents and for surveys with missing or incomplete budgets. <sup>m</sup> Total capital need figure schudes transit capital projects (BART, VTA, High Speed Rail, Caltrain, SMART, eBART, Dumbarton Rail, Transbay rail, SF Muni, Amtrak, & Ferry capital expansion projects). <sup>m</sup> Data about infrastructure needs was not provided or was incomplete for the following PDAs: Berkeley Downtown, San Pablo Avenue, South Shattuck, and University Avenue; Dublin Town Center and Transit <sup>m</sup> Data about infrastructure needs was not provided or was incomplete for the following PDAs: Berkeley Downtown, San Pablo Avenue, South Shattuck, and University Avenue; Dublin Town Center and Transit <sup>m</sup> Center/Dublin Crossings, San Pablo-San Pablo Avenue Corridor, San Rafael Downtown and Civic Center/North Rafael Town Center, San Francisco/San Mateo Bi-County, Menlo Park El Camino and Downtown, San



Grammar, a Victim in the Office 5.

Most Read Articles Feed

### Latest Tweets

Enlarge Image

Michael Mullady for The Wall Street

lan Schugel, outside his new building, moved to San Francisco from New York City and says he found the market 'more cutthroat' than Manhattan.

snapped up.

listed at \$3,100 a month, had been

The new migration follows a long period in which San Francisco lost residents to

San Francisco for other parts of the U.S., according to California's Department of Finance. The city of roughly 800,000 continued to grow due to immigration from abroad. But in the fiscal year ended last June 30, net domestic outflow fell to 3,400 people, the best performance since fiscal 2000.

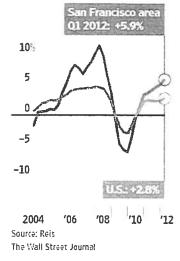
While there are no migration data for late 2011 or this year, employers and economists say the renewal of San Francisco's tech scene is luring many workers from elsewhere. Local tech companies including Zynga and Twitter Inc. have expanded in San Francisco, and many techies who work at Facebook Inc., Google Inc. and Apple Inc., in Silicon Valley to the south, are opting to live in the city, too.

In April, the city's unemployment rate was 7.4%, down from 8.4% a year earlier. That compares with 8.1% for the nation, down from 9% a year earlier, according to the Bureau of Labor Statistics.

Livefyre Inc., a San Francisco start-up working on online-commenting technology, said it has hired about a quarter of its 45 employees from outside the Bay Area. "We're seeing more and more talent gravitating towards San Francisco, particularly in our engineering group, where we look across the country to recruit top talent," said Jordan Kretchmer, Livefyre's founder and chief executive.

### **Pricey Pads**

Change from a year earlier in average rents, by quarter



The city's renewed popularity comes with problems. The average number of weekday riders on the Caltrain commuter line connecting San Francisco with Silicon Valley rose 12.7% in April from a year earlier, despite fare increases. "We're bursting at the seams," said Christine Dunn, a spokeswoman for Caltrain, which plans to add six trains to the service. In South of Market, the burgeoning pedestrian population is raising concerns about people getting hit by cars, said the city, which is weighing stronger traffic-control measures.

Economists and real-estate experts say San Francisco, with its tight supply of apartments and strict limits on the construction of new developments, can't keep up with the flood of techies streaming in. The result, beyond happy landlords, is soaring costs and a chaotic scrum for rentals.

The San Francisco area, which real-estate research firm Reis Inc. defines as the city plus

Marin and San Mateo counties, had the nation's fastest-rising costs to rent a home in the first three months of this year. The average monthly rent hit \$1,888, up 5.9% from a year earlier, the biggest jump of all U.S. metropolitan areas tracked by Reis. The rise nationwide was 2.8%.

The second-fastest-growing market was an area of Silicon Valley anchored by San Jose, where rents jumped 4.9% over the same period. The average rental cost remains about 20% lower in the San Jose area than in the San Francisco area---the country's second-most-expensive rental market behind New York City, according to the Reis data.

Donovan McKendrick, owner of San Francisco property-management company DMcK Properties, said that earlier this year he raised the rent on a two-bedroom, 600-square-foot apartment in the Mission neighborhood by 40% to \$2,800 a month.

"As long as we do basic renovations such as new paint and maybe cleaning up the



eliotwb: RT @NYCHousing: As of today, @nychousing and partners have #financed more than 10K affordable homes this fiscal year! 3 hrs ago



NickTimiraos: RT @Reddy: Mark Cuban: saying high-freq traders create liquidity "is like saying spitting in a thunderstorm is adding liquidity." http://t.co/b5Um0aDw 4 hrs ago



RWhelanWSJ: Housing inventory plunges, but there's plenty of shadow inventory in the wings: http://t.co/jcLyYyO6 #housing 5 hrs ago



AlanZibel: How Much Flood Insurance Is Enough? -Developments - WSJ http://t.cd/hpvEDeke via @WSJ 5 hrs ago



KrisHudsonWSJ: To Fix Housing, Don't Break It, #RE/Max CEO Says #NAREE2012 http://t.co/TPEC6AJ8 via @WSJ 5 hrs ago

Follow WSJ on

### Latest Headlines

Court Upholds EPA's Greenhouse-Gas Rules Americans Are Divided on Health Law Arrests Made Over Massive Online Sting Operation Senate Leaders Reach Student-Loan Deal Sen. McCaskill to Skip Democratic Convention Forecasts Hint Fed Might Change Rate Guidance High Court Splits on Arizona Law Health-Law Money in Limbo Court Rejects Mandatory Life for Juveniles Stalled 'Debby' to Soak Florida for Days

Recession

**Fiscal Times** 

### More Headlines

### From Around the Web Content From Sponsors



5 Costly Retirement Surprises Kiplinger Gen X Disproportionally Affected by the



Powered by Taboola

How Google's Marissa Mayer Prevents Burnout Entrepreneur

Tech Boom Hits San Francisco Rental Prices - WSJ.com

4

appliances or installing new ones, we get 30% to 40% uplift in rent on the same unit," he said.

Gentrification is raising alarms among advocates for renters with low to moderate incomes. Some are being pushed out to cities up to 100 miles from San Francisco in search of affordable homes, advocates say.

"People have a lot of money and are willing to do whatever it takes to land a spot," said Ryan Paredez, a 26-year-old student at San Francisco State University who on a recent apartment hunt found himself contending with doctors and other professionals. "I can't compete with that."

Write to Shira Ovide at shira.ovide@wsj.com

JOIN THE DISCUSSION 27 Comments, add yours

### Don't Miss...



Add a Comment View All Comments (27)

PERSONAL FINANCE Daughters of Formula 1's Bernie **Ecclestone Spend** 03:29

BUSINESS The Business of Being a Kardashian 02:42





NEWS SmartMoney: Home Prices Aren't

Powered by Taboola

PERSONAL FINANCE

A Mansion in San

Francisco Sells for

\$27 Million

**Coming Back** 

01:13

04:39

Community rules

All comments will display your real name. Start typing your comments here ...

Track replies to my comment POST

CLEAR

### **Editors' Picks**



Cocaine Expansion in Peru Raises Fears of Global Spread



**Tech Boom Hits Rental** Prices



Chinese Target U.S. Homes



In the Land of Giveaways, Mr. Cohn Is the Sultan of Swag



Study Looks at Irish Risk for Rare Disease

San Francisco County Transportation Authority

100 Van Ness Avenue 2674 Floor San Francisco, California 94102 VOICE 415-522-4800 FAX 415-522-4829 info@sfcta.org www.sfcta.org



### Memorandum

Date:	04.15.11	RE	: 1	Plans and I	~	Committee pril 19, 2011
To:	Plans and Programs Commissioners Campos (Chair), Wiener and Mirkarimi (Ex Officio)	Chu	(Vice	Chair),	Avalo	s, Chiu,
	Tilly Chang – Deputy Director for Planning MC Maria Lombardo – Chief Deputy Director for Policy and	Prog	rammi	ng M	1	
Through:	José Luis Moscovich – Executive Director					
Subject:	INFORMATION – Update on Initial Vision Scenario Communities Strategy	of	the B	ay Are	a's Su	stainable

### Summary

The Metropolitan Transportation Commission (MTC) and the Association of Bay Area Governments (ABAG) are developing the Bay Area's first Sustainable Communities Strategy (SCS) an integrated transportation, housing, and land use plan that will form the basis for the 2013 Regional Transportation Plan (RTP) and Regional Housing Needs Allocation process. In March 2011, MTC and ABAG released the Initial Vision Scenario (IVS) for the RTP/SCS, which responds to requirements that the SCS must identify a strategy to accommodate the region's entire housing need by income level. In April and May, MTC and ABAG will seek input from San Francisco stakeholders. This input will be used to develop multiple Alternative Scenarios (varying transportation and land use assumptions) that will build on the IVS. While the IVS does not assume any funding constraints and represents an aspirational goal for how the region would ideally develop, the Alternative Scenarios must be financially constrained as required by Federal air quality conformity rules. Refinement of the Alternative Scenarios will lead to the selection of a preferred RTP/SCS scenario in late 2011. We have been leading coordination among City agencies to develop a unified set of San Francisco messages about the IVS. Our initial staff reaction to the IVS, informed by input from other San Francisco agency staff, is detailed in this memorandum. Two of the key messages include: 1) the amount of growth targeted for San Francisco, while consistent with San Francisco's own vision, should not be taken for granted and will require significant policy and funding support from the region to achieve; and 2) development of the Alternative Scenarios should be accompanied by an accelerated discussion of regional discretionary transportation policy to clarify the link between regional transportation and land use policy and provide incentives for achieving SCS housing and carbon reduction goals. This is an information item. We are seeking input and guidance from the Committee.

### BACKGROUND

The Metropolitan Transportation Commission (MTC) and the Association of Bay Area Governments (ABAG) are developing the Bay Area's first Sustainable Communities Strategy (SCS) an integrated transportation, housing, and land use plan that will form the basis for the 2013 Regional Transportation Plan (RTP) and Regional Housing Needs Allocation (RHNA) process. The SCS is required by Senate Bill 375 (Steinberg) which became law in 2008 and must meet two basic requirements: 1) achieve a greenhouse gas emission reduction target set by the California Air Resources Board by reducing vehicle travel and 2) identify a strategy to house the region's entire housing need by income level. The SCS has the potential to transform the distribution of funding in the RTP (total funding in the 2009 plan was \$218 billion over 25 years), as well as develop new policies and incentives to support the implementation of RTP/SCS goals including the realization of Priority Development Areas (PDAs) in San Francisco.

As congestion management agency (CMA) for San Francisco, the Authority is leading the coordination of San Francisco's input into the process. We briefed the Authority's Plans and Programs Committee and Citizens Advisory Committee on the SCS process in January, February, and March of 2011, and presented jointly with Planning Department staff to the Planning Commission in February 2011. Chair Mirkarimi also hosted two Leadership Roundtable events with San Francisco elected officials, department directors and regional agency staff in September and December of 2010.

To date, our comments to the region in various forums have outlined what it will take to realize San Francisco's growth plans, emphasizing the critical need for discretionary regional funding to support jurisdictions such as San Francisco that are already planning for growth and developing sustainable and cost-effective projects. For example, in Winter 2010, San Francisco conveyed to MTC/ABAG in a letter dated December 20, 2010 (see Attachment 1: San Francisco Initial Vision Scenario Input Letter) the City's plans to accommodate 63,000 housing units within Priority Development Areas (PDAs) and the potential for an additional 17,000 housing units to be accommodated at smaller infill sites along transit corridors throughout the city, but emphasized that achieving these goals would require strong regional

### DISCUSSION

support and policy incentives.

Last month, MTC and ABAG released the Initial Vision Scenario (IVS) as a starting point for the development of the SCS. The IVS responds to the SB 375 requirement that the SCS house the region's entire housing need by income level. As such, ABAG has developed a housing target of 270,000 more housing units by 2035, over and above the 634,000 new housing units forecast by 2035 as a part of current regional plans. The housing target represents the increase in Bay Area housing supply that would be necessary to provide housing units for: 1) workers who would otherwise in-commute from neighboring regions, and 2) multiple households which would otherwise share one housing unit. We are working with regional staff to review key demographic assumptions that may reduce the needed housing units.

On March 11, 2011, MTC and ABAG released the IVS (see Attachment 2: Plan Bay Area: Initial Vision Scenario for Public Discussion), which distributes 903,000 units of housing and 1.2 million jobs throughout the region to PDAs and other growth areas, called Growth Opportunity Areas (GOAs) identified by local jurisdictions. In whole, 70% of new housing units are accommodated in PDAs or GOAs. The IVS does not assume any funding constraints and represents an aspirational goal for how the region would ideally develop.

Table 1, below, shows the amount of housing and job growth assumed in the region and in San Francisco in the IVS, and how these numbers compare to the amount of growth projected in a business-as-usual future, referred to as "current regional plans." While the IVS assumes 90,000 housing units in San Francisco, 17,000 more than what is assumed in current regional plans, the total expected population is consistent with the Planning Department's growth plans over the same period.

The IVS also assumes additional transportation investments to support that growth. Of relevance to The IVS also assumes additional transportation investments to support that growth. Of relevance to San Francisco is more frequent service on Bay Area Rapid Transit (BART), Caltrain, and Muni Metro, as well as additional dedicated bus lanes. These land use and transportation network assumptions were analyzed using MTC's travel demand forecasting tool to estimate the performance of the IVS against performance targets adopted by MTC and ABAG. Performance is mixed among the targets (see Attachment 3: Initial Vision Scenario and Current Regional Plan Performance Target Results). In particular, while an improvement over current regional plans, the IVS does not achieve the greenhouse

gas emission reduction target as set for the Bay Area by the Air Resources Board. MTC and ABAG have indicated that as they create several Alterative Scenarios, one area of focus to improve greenhouse gas reduction performance will be to explore transit-oriented employment distributions throughout the region to address job sprawl and job-housing match.

	Housir	ng Units	Jo	bs
	Region	San Francisco	Region	San Francisco
2010	2,670,000	347,000	3,271,000	545,000
Increase by 2035 – Current Regional Plans	+634,000	+71,000	+1,129,000	+154,000
Total in 2035 – Current Regional Plans	3,304,000	418,000	4,400,000	698,000
Increase by 2035 – Initial Vision Scenario	+903,000	+90,000	+1,222,000	+169,000
Total in 2035 – Initial Vision Scenario	3,572,000	437,000	4,493000	714,000
IVS change relative to Current Regional Plans 2035	+269,000	+19,000	+93,000	+16,000

Table <sup>•</sup>	l: Regional	and San	Francisco	Growth:	Current	Regional	Plans	vs. I	Initial	Vision	Scenario
--------------------	-------------	---------	-----------	---------	---------	----------	-------	-------	---------	--------	----------

San Francisco Response: We have been leading coordination among City agencies to develop a unified set of San Francisco messages about the IVS which will be subsequently discussed at the third Leadership Roundtable meeting with MTC and ABAG staff. These messages include the following:

- 1. Level and Quality of Growth. While San Francisco is supportive of this pioneering and ambitious regional planning effort, the region should not take for granted the significant level of growth that is planned for San Francisco. San Francisco needs a greater share of regional discretionary funding than we have received historically, even to produce the 71,000 households and 154,000 jobs assumed in current regional plans. Our ability to accommodate more growth depends heavily on the support that the region provides through the RTP. Anticipating that regional policymakers will be interested in the quality of growth plans, and not just the quantity, we urge MTC and ABAG to collaboratively complete ABAG's PDA Assessment work which evaluated the completeness and readiness of PDA growth plans around the region.
- 2. Distribution of growth.
  - More compact growth. By accommodating 70% of growth in PDAs or GOAs, the IVS represents a more compact footprint than what is assumed under current regional plans; however, the region should focus on making that footprint even more compact in the Alternative Scenarios. A full 100% of San Francisco's growth in the IVS is located in PDAs or GOAs. Although a bottoms-up approach was taken during the IVS to identify additional areas for growth, the region should now take a top-down look at areas that have not yet identified GOAs or PDAs, but may still be suitable for growth, with a focus on locating more employment near transit and housing and affordable housing in transit-oriented complete communities.
  - More income diversity in complete communities. In comparison to the 2007-2014 RHNA, it appears that the IVS represents a more evenly distributed development pattern within the region (we have requested summary analysis at the local jurisdiction level to confirm this). That is, less of the growth is concentrated in the cities of San Francisco, Oakland, and San Jose. The region should adopt a RHNA Methodology that results in a comparable outcome by prioritizing a housing distribution that results in

increased income diversity among multiple Bay Area place types.

- 3. We urge MTC and ABAG to advance the discussion of regional transportation investment policy such as by establishing high-level principles, in order to clarify the link between RTP funding policy and regional land use growth plans and policy. San Francisco and other jurisdictions can provide a more informed response to MTC and ABAG on how the region should transition from the IVS to the Alternative Scenarios with a better understanding of the policies that will be available to support the local growth plans. Specifically, we would support a regional investment policy for the SCS that includes the following components:
  - Stronger nexus with system demand, especially with transit first modes. This policy could be achieved by revisiting formulas that allocate funding based on share of population and/or lane miles; e.g. while San Francisco is only 11% of the region's population, it is 16% of its employment, 14% of overall trip ends, and 61% of its transit trip ends (SF-CHAMP, 2010). This nexus is particularly relevant to how maintenance resources are allocated.
  - Nexus with growth, in particular expansion of policies that support areas accommodating growth in PDAs. As indicated by the findings of ABAG's PDA Assessment, "not all PDAs are created equal." As noted above, regional policy needs to consider factors of quality and quantity, such as the overall amount of growth being planned for, how much of that growth is affordable housing, the level of transportation and transit development, and the amount of local public and private funding that supports these investments.
  - Nexus with affordable housing production to send a strong message about the relationship between the SCS and the RHNA. This type of policy could be achieved by establishing a funding mechanism that considers a jurisdiction's track record for affordable housing development and preservation, and/or the number of lower income housing units that is planned.
  - Nexus with performance to ensure the region is investing cost-effectively. In particular, given the severely limited transportation funding environment, and the challenge of achieving the performance targets for the SCS, it is especially important to scrutinize large capital investments where lower cost capital or management options may be equally or similarly effective.
- 4. New Revenue Advocacy. Finally, we encourage MTC and ABAG to use the RTP/SCS to advocate for new revenue opportunities, as well as advance robust funding strategies, including road user fees. Advocacy for new regional revenues sources should include development of new regional transportation revenue sources to fund transportation needs, in particular to address chronic transit operating and infrastructure State of Good Repair (SOGR) shortfalls (e.g., the San Francisco Municipal Transportation Agency's SOGR needs are estimated at more than \$10 billion). In addition, in order to achieve the SCS goal to accommodate the region's entire housing need, new non-transportation revenue sources are needed to provide non-transportation infrastructure needs such as affordable housing production.

Next Steps: MTC and ABAG are seeking input on the IVS from local jurisdictions, CMAs, transit operators, advocates, members of the public, and other stakeholders in April and May. After the Plans

and Programs Committee meeting, additional San Francisco outreach will include:

- A public workshop, on April 25, 5:30 to 8:30 p.m. at Milton Marks Conference Center, 455 Golden Gate Avenue. This will be a public workshop hosted by MTC and ABAG to get the public's input on regional growth and transportation priorities. A similar workshop is planned in each of the other eight Bay Area counties.
- A third Leadership Roundtable meeting, in early May, with MTC and ABAG staff and San Francisco's representatives that serve on MTC, ABAG, and the Bay Area Ar Quality Management District.

MTC and ABAG will use input received at these events to develop Alternative Scenarios (varying both transportation and land use assumptions) that will build on the IVS, between June and August. 2011. In contrast to the IVS, the transportation investments assumed in the Alternative Scenarios must be financially constrained, in response to Federal air quality conformity rules. In addition, the Alternative Scenarios will utilize the findings of the project-level performance assessment being conducted for all projects submitted by CMAs and regional transit plans developed through the Transit Sustainability Project. By fall, the region will hold detailed transportation investment policy discussions, informing the selection of one of the Alternative Scenarios, or a hybrid of two or more scenarios as the Preferred Scenario in late 2011 or early 2012. The Preferred Scenario will then be cleared environmentally and adopted by MTC and ABAG as the SCS in April 2013. We will continue to provide regular updates to the Plans and Programs Committee as development of the RTP/SCS progresses through these milestones.

This is an information item. We are seeking input and guidance from the Committee.

#### ALTERNATIVES

None. This is an information item.

#### CAC POSITION

The Citizens Advisory Committee will be briefed on this item at its April 27, 2011 meeting.

#### **FINANCIAL IMPACTS**

None. This is an information item.

#### RECOMMENDATION

None. This is an information item.

#### Attachments:

- 1. San Francisco Vision Scenario Input Letter, dated December 17, 2010
- 2. Plan Bay Area: Initial Vision Scenario for Public Discussion, Report dated March 11, 2011
- 3. Initial Vision Scenario and Current Regional Plan Performance Target Results

SAN FRANCISCO PLANNING DEPARTMENT



MITA Municipal Transportation Agency

December 17, 2010

Marisa Raya, Regional Planner Association of Bay Area Governments (ABAG) 101 Eighth St. Oakland, CA 94607

Subject: SCS Vision Scenario Place Types and Policies: San Francisco Input

Dear Marisa:

On behalf of the City and County of San Francisco, we thank you for the opportunity to provide input into the development of the "Vision Scenario" for the Bay Area's first Sustainable Communities Strategy (SCS). We have developed the information ABAG requested regarding our vision for sustainable growth, including the "Place Types" that most accurately describe the San Francisco-designated Priority Development Areas (PDAs) and the policies, incentives, and implementation strategies that will be necessary to achieve our vision.

San Francisco is planning to accommodate more than 60,000 new households in PDAs by 2035. This represents the placement of over 90% of our county growth targets (from Projections 2009) within PDAs. This is significant as the next closest county achieves only ~40% of new households in PDAs<sup>1</sup>. However, our willingness to plan for this growth cannot be taken for granted and, in order to be realized, must be accompanied by regional resources for core infrastructure investment and supportive policy reform. As ABAG and MTC work to develop the "Vision" scenario and initiate regional funding policy discussions in early 2011, we hope the discussion will be guided by the following principles:

- 1. Maintenance resources should be prioritized for jurisdictions that are currently accommodating regional growth and travel in an equitable and sustainable manner; and that demonstrate progress toward meeting RHNA affordable housing targets.
- 2. Expansion resources should be prioritized for jurisdictions that are proactively planning to accommodate expected growth and particularly affordable housing between 2010 and 2035, in a sustainable and cost-effective manner;
- 3. Discretionary resources should be prioritized for projects that reduce regional greenhouse gas emissions equitably and cost-effectively over their life cycle; and for projects that serve TOD that includes affordable housing.

<sup>&</sup>lt;sup>1</sup> Based on PDA Assessment data reported at 9/2010 RAWG

O:\Environmental - Sustainability\SCS\Vision Input - for Dec15\SF Vision Submittal Letter-FIN.doc

M. Raya, 12.17.10 Page 2 of 5

Below, we provide the requested input on San Francisco's vision for growth.

#### Place Types

We confirm the current Place Type designation for the majority of San Francisco's PDAs, as noted below.

- <u>Regional Centers</u>: Downtown Neighborhoods, Transbay Terminal/Transit Center District
- <u>Urban Neighborhoods</u>: Market & Octavia, Eastern Neighborhoods, Bayview/Hunters Point Shipyard/Candlestick Point, Mission Bay
- <u>Transit Neighborhoods</u>: Balboa Park, San Francisco/San Mateo Bi-County Area (includes the Executive Park/ Visitacion Valley/ Schlage Lock Plan Areas)
- <u>Transit Town Center</u>: 19th Avenue Corridor
- <u>Mixed Use Corridor</u>: Mission-San Jose Corridor

While the current Place Type categories adequately capture residential developments, we view the lack of a Place Type category that will accommodate significant job centers outside of the Regional, City and Suburban Center types as a constraint. For example, there is no good fit for the Port of San Francisco, whose land use plan focuses on job development, due to state restrictions on development on port land.

San Francisco's PDAs generally fall on the high end of unit targets and new projected density compared to the available Place Types. The current Place Type definitions fail to capture the high proportion of jobs to housing units that many of San Francisco's PDAs offer. We request that ABAG staff notify us if these differences will be material for any uses of the place type designations in the SCS planning process or for any other purposes.

#### Policies and Incentives

The policies and incentives listed in the Policies and Place Types Form are all needed to some extent to support the overall level of growth in each of our Planned and Potential PDAs (except for funding to acquire open space). The policy areas of particular importance to San Francisco include:

- Enhanced funding for regional core transportation and non-transportation infrastructure such as water, sewer, utilities, and parks;
- Funding for affordable housing;
- Increased maintenance funding;
- Adequate provision of water treatment and water supply;
- Parking pricing policy;
- Improvements to school quality.

M. Raya, 12.17.10 Page 3 of 5

#### **Implementation Strategies**

Many of the implementation strategies listed in the Policies and Place Types Form have already been put to use in San Francisco, including:

- Zoning for increased densities and/or mix of uses;
- Provision of affordable housing through zoning;
- Funding affordable housing development;
- Retention of existing affordable units; and
- Implementation of community impact fees, commercial linkage fees.

Implementation strategies needed to support growth of particular importance to San Francisco include:

- Major regional transit capital improvements beyond Resolution 3434;
- Transit capital improvements to bring fleets, guideways and facilities to a state of good repair;
- Non-motorized and alternative mode infrastructure investments such as walking and bicycle facilities. Bicycling alone has grown 58% in the last three years in San Francisco;
- Transportation demand management strategies such as parking management, ridesharing, virtual commuting and congestion pricing;
- Value capture/redevelopment infrastructure improvement;
- Increased transit service frequencies for core trunk lines serving PDAs;
- Improvements in non-auto access to schools, job centers, and other major destinations; and
- Utility and other infrastructure improvements, including adequate provision of water and sewer.

#### Accommodation of Growth

San Francisco's Adopted and Planned PDAs collectively accommodate over 63,000 new housing units, and 136,000 new jobs. Healthy absorption of the city's existing vacancies in PDAs like Downtown provides the opportunity for another 23,000 or more jobs. However, new growth in San Francisco is not confined to PDAs. The city includes numerous small-scale infill opportunity sites close to transit throughout all of its neighborhoods. Such sites outside of Priority Development Areas could accommodate another 17,000 new housing units, distributed reasonably evenly throughout the city. Cumulatively, San Francisco's PDAs and other opportunities yield the potential for over 85,000 housing units and almost 160,000 more jobs, more growth than is likely to be projected for San Francisco under the SCS P2011 Projections.

The ABAG-highlighted "Other Significant Areas" do not represent particular places that should be considered within the SCS process, and the city is not proposing any new PDAs. The lion's share of city's growth will continue to be focused in its PDAs, including new plans (such as the Western SOMA Plan under development, and the pending initiation of a plan for the Central Subway alignment, within the Downtown and Eastern Neighborhood PDAs); and growth opportunities will M. Raya, 12.17.10 Page 4 of 5

be pursued as appropriate at smaller scale infill opportunities along transit lines outside of the PDAs.

How people commute to work has dramatic implications for the region's overall sustainability. In major downtowns like San Francisco and Oakland, a high percentage of workers commute by means other than automobile; outside of these areas, the percentage of workers that do not drive to work is insignificant. Increasing workplace development capacity in major centers, as opposed to other localities in the region, will go further to support both local and regional goals to reduce greenhouse gas emissions.

However, with the limited information available, San Francisco cannot volunteer to accept more growth. While more funding, incentives and policy support would inevitably increase the City's ability to accommodate and to manage growth, there is no way for the City to make a fair estimate of "how much" more growth would require, nor any way for us to assess how that growth could fit within the fabric of our city.

While San Francisco has pioneered transit supportive development over the past few decades, we are at our limit in terms of transit's ability to carry more people in the peak period without significant new right-of-way, fleet and facility expansion. Our transit state of good repair backlog is over \$2 billion just to maintain current service levels let alone the additional service levels from the expected growth, and similar backlogs exist for the regional transit service providers who serve San Francisco, such as BART and Caltrain. These core capital capacity constraints are regional in nature and will need a regional focus on resource prioritization for these PDAs to be successfully implemented. In addition, San Francisco needs over \$750 million to bring our local streets to a state of good repair, and many PDAs have significant non-transportation infrastructure investment needs as well, lacking the community assets necessary to make them complete communities.

San Francisco uses the strategies noted above to create and preserve affordable housing. Yet despite a deep commitment to mixed-income communities, the City has been unable to achieve more than a third (34%) of our RHNA affordable housing target. In the absence of additional resources for affordable housing, the City will be unable to accommodate equitable and sustainable growth at projected levels. Under the current RHNA for San Francisco, more than 60% of our projected housing need requires subsidy. San Francisco is making tremendous efforts and is succeeding in its efforts to bring affordable units into production. However, without financial support we will not have the ability to keep up with the mandated RHNAs.

We are further challenged by needing to pace growth with new investment. While San Francisco's planning efforts aim to combine changes in zoning with proposals for new infrastructure investment, we continually face resistance from neighborhoods who are skeptical that needed infrastructure will come. There is a very real threat of neighborhood demand for legislation that meters growth according to infrastructure provision, thereby restricting zoning changes and any development under those zoning changes, until after the infrastructure is in place.

In sum, the region cannot assume, or take for granted, San Francisco's growth plans. We need support and incentives, in order to realize our vision. In doing so, San Francisco is poised to help the region realize our shared region for a more sustainable Bay Area. We hope this input is helpful in shaping the SCS "Vision" scenario. We look forward to continuing our collaboration and to M. Raya, 12.17.10 Page 5 of 5

participate in the SCS/RHNA/RTP planning process.

John Rahaim —Planning Director, San Francisco Planning Department

Nathaniel P. Ford, Sr. Executive Director/CEO San Francisco Municipal Transportation Agency

José Luis Moscovich Executive Director, San Francisco County Transportation Authority

Com. Alioto-Pier, Avalos, Campos, Chiu, Chu, Daly, Dufty, Elbsernd, Mar, Maxwell, Mirkarimi cc: S. Heminger, D. Kimsey, MTC E. Rapport, K. Kirkey, ABAG B. Strong, Capital Planning M. Lee-Skowronek, Caltrain B. Garcia, DPH V. Menotti, BART E. Reiskin, DPW N. Kirschner-Rodriguez, Mayor's Office M. Yarne, MOEWD D. Shoemaker, MOH M. Nutter, SFE T. Papandreou, B. Yee, SFMTA F. Blackwell, SFRA E. Harrington, PUC TC, MEL, ALA, RH, AC, ZB, LB, Chron, File: SCS

O:\Environmental - Sustainability\SCS\Vision Input - for Dec15\SF Vision Submittal Letter-FIN.doc

E M O

Re:	Regional Housing Needs Allocation Methodology	
Date:	January 4, 2007	
From:	Paul Fassinger, ABAG Research Director	
То:	ABAG Executive Board	
		1

#### Recommendation

Staff recommends that the ABAG Executive Board adopt Resolution 02-07 authorizing the release of the Regional Housing Needs Allocation (RHNA) Methodology for the 2007-2014 period. The recommended methodology is reflective of the discussion at the November 18th Executive Board meeting and additional comments received during the public comment period. Staff recommendations are also inclusive of a January 4th, 2007 meeting of the Housing Methodology Committee held to review the alternatives described in this report.

The staff recommends that the Executive Board adopt a revised methodology that has less emphasis placed on transit than the draft RHNA methodology had (Alternative 2: Reduced Transit, as described below). In addition, staff recommends that the Board adopt a RHNA method that adjusts the income allocation to move jurisdictions from their current income distribution to a 175 percent adjustment toward the regional average distribution (Alternative 1: Percent Adjustment toward Regional Average, as described below). The staff also recommends that policies regarding spheres of influence be changed to reflect the agreement between the County of Marin and its cities. Staff also recommends that policies on transfers of units and sub regions should remain unchanged from the draft methodology.

On January 4th, the Housing Methodology Committee met to discuss alternative transit weights in the methodology and different scenarios for allocating units by income, as described in this memo. The committee members were divided in their support for the weighted factors. A slim majority of the members endorsed the existing draft allocation; however, there was also strong support for a "no transit" alternative, i.e. Alternative 3 described below. The draft allocation and the "no transit" alternatives are at the opposite ends of the spectrum in terms of a transit factor, and therefore have contrasting effects on the allocation. Many committee members endorsed the existing methodology as an expression of regional policy. The support for a no transit alternative came from the larger cities and developed suburbs. The larger cities countered that the allocation was too aggressive, and that the Projections forecast already promotes regional policies. They also commented that more mid-size cities in the region could do more to accommodate housing and that the responsibility should not be too heavily placed on relatively few cities. The lack of resources associated with developing housing, especially low income housing, was also cited as a reason the larger cities could not realistically accommodate the amount of housing assigned to them under the draft scenario. The staff recommendation for the reduced transit alternative is a balance between these two counter positions.

For allocating units by income, the HMC clearly supported the percentage adjustment toward the regional average. The committee believes that a method that considers existing income distributions in a community is appropriate to reduce existing concentrations of low-income households. Committee members also believe that the significant allocation that some of the larger cities will be getting in this RHNA cycle should be taken into consideration, as some of these same places are also where there are currently high concentrations of low income housing. Therefore, the committee felt that more should be done to account for existing concentrations of low income units. However, the committee members felt that the tiered adjustment proposal was too complex. Rather,

a significant majority supported a 175 percent adjustment toward the regional average, as this approach would weight rather heavily existing inequities in income distributions within an individual community, as opposed to the draft RHNA methodology.

#### Background

Comments received on the draft RHNA method were predominately on the weighted factors that allocate the total need and on the income allocation component of the methodology. For the factors allocating the total need, local jurisdictions have expressed concern with the use of both existing and planned transit as factors in the methodology. Some believe that this factor unfairly burdens those jurisdictions with either existing or planned transit, especially those cities with multiple transit stations. Staff has developed three alternative scenarios that include 1) existing transit only; 2) a reduced transit factor; and 3) no transit. This staff report describes these alternatives and the anticipated impact to local housing allocations.

Some local jurisdictions believe the proposed income allocation methodology does not do enough to alleviate existing concentrations of low-income households. There is concern that, because the draft recommendation assigns an "equal share" to each jurisdiction and does not take a jurisdiction's existing income distribution into account, it unfairly burdens jurisdictions with existing high concentrations of low-income households. As a result, the draft method is perceived to perpetuate regional social and economic inequities. Staff has also developed three alternative income allocations. In contrast to the draft methodology, these alternative scenarios take into account existing income distributions within individual communities and attempt to address existing concentrations of low-income households. This staff report describes these alternative income allocations.

#### RHNA Methodology Recommendations & Alternatives

The regional housing needs allocation methodology is the tool used to assign each jurisdiction in the Bay Area its share of the region's total housing need. The actual tool is a mathematical equation that consists of weighted factors. There are also a set of "rules" that dictate how units will be allocated by income, within spheres of influence, voluntary transfer of units, and subregions. The HMC's recommendation encompasses these distinct components of the methodology.

In their recommendation, the HMC members considered local land use plans and policies, regional growth policies and the state's housing polices, as expressed in the state mandated RHNA objectives. Additional information on how these recommendations were derived is contained in the attached report.

#### 1. Weighted Factors

The HMC identified three broad categories of factors to be considered for inclusion in the RHNA methodology, including housing, employment and access to public transit (existing and planned).

#### Draft Recommendation

The weighted factors in the draft allocation methodology, as recommended by the HMC are:

- Household Growth, 40 percent;
- Employment Growth, 20 percent,
- Existing Employment, 20 percent
- Household Growth near Transit, 10 Percent;
- Employment Growth near Transit, 10 Percent

As expressed in the public comments received thus far, the transit component of this allocation scenaric is a point of contention for many jurisdictions in the Bay Area. The HMC and ABAG staff agreed, however, that a factor that directs growth to areas with public transit could benefit the region. Growth near transit could improve

regional and interregional commuting, reduce vehicle miles traveled, and therefore lower carbon emissions and greenhouse gases.

In response to the concerns over the transit component of the allocation method, staff has developed three alternative scenarios. The alternative allocation scenarios remove planned transit, reduce the weight of the transit factor, and remove transit altogether as a factor in the methodology.

#### Alternative 1: Existing Transit Only

This scenario keeps the same weights for each factor as the draft method; however planned transit is removed from consideration - only existing transit is included.

Under this scenario, the weighted factors are:

- Household Growth, 40 percent;
- Employment Growth, 20 percent,
- Existing Employment, 20 percent
- Household Growth near Existing Transit, 10 Percent;
- Employment Growth near Existing Transit, 10 Percent

The effect of removing planned transit and only including existing transit is that jurisdictions with planned transit would see their allocation go down, compared to the draft allocation numbers. These jurisdictions include Brentwood, Antioch, Oakley, and the northern rural counties of Marin and Sonoma. Jurisdictions with existing transit, especially multiple transit stations, would see their allocation increase, including Oakland, San Francisco, Berkeley, El Cerrito, and San Leandro.

#### Alternative 2: Reduced Transit (Staff Recommendation)

This scenario reduces the weight of the transit factor in the methodology. In addition, planned transit is removed from consideration. Only existing transit stations, fixed rail and ferry, are included. As a result, household growth, existing jobs and employment growth receive a greater weight in the allocation formula.

Under this scenario, the weighted factors are:

- Household Growth, 45 percent;
- Employment Growth, 22.5 percent,
- Existing Employment, 22.5 percent
- Household Growth near Transit, 5 Percent;
- Employment Growth near Transit, 5 Percent

The effect of reducing transit's weight in the allocation and removing planned transit is that many jurisdictions with transit, including Oakland, San Francisco, Berkeley, Walnut Creek and similar cities, would see their allocations reduced over the draft method numbers. Allocations would go up in cities with high levels of expected household growth or where there are no or limited transit stations, including Brentwood, Antioch, Oakley, and the northern rural counties of Napa and Sonoma.

Because household growth is weighted more heavily in this scenario, jurisdictions with planned transit, their anticipated increase in household growth (household growth is weighted more heavily in this scenario) would offset any reduction that removing the planned transit option would have had. Therefore, most jurisdictions with planned transit would see their allocations go up over the draft allocation numbers. These jurisdictions include Brentwood, Antioch, and Oakley, and the northern rural counties of Sonoma.

#### Alternative 3: No Transit

This scenario removes transit from the allocation methodology. The effect is that household growth and employment would be given greater weight. The effect of removing transit would be that jurisdictions with transit, including Oakland, San Francisco, Berkeley, Walnut Creek and similar cities, would see their allocations reduced over the draft method numbers. Allocations would go up in cities with high levels of expected household growth or where there are no or few transit stations, including San Jose, Brentwood, Antioch, Oakley, and the northern rural counties of Napa, Marin and Sonoma.

Under this scenario, the weighted factors are:

- Household Growth, 50 percent;
- Employment Growth, 25 percent,
- Existing Employment, 25 percent

#### 2. Regional Income Allocations

In the recommendation to the ABAG Executive Board, the HMC and ABAG staff proposed that each local jurisdiction plan for income-based housing units in the same ratio as the regional average income distribution. This is deemed an "equal share" approach because each jurisdiction would receive the same proportion of housing units in each affordability category (very-low, low, moderate, and above moderate). Although considered an equitable approach, this income allocation method does not consider existing concentrations of low-income households in a community. Based on 2000 Census figures, the regional income distribution is:

- Very Low, 23 Percent Households with income up to 50 percent of the county's area median income (AMI)
- Low, 16 Percent Households with income between 50 and 80 percent of the county's AMI
- Moderate, 19 Percent Households with income between 80 and 120 percent of the county's AMI
- Above-Moderate, 42 Percent Households with income above 120 percent of the county's AMI

#### Alternative 1: Percent Adjustment Toward Regional Average

By allocating each jurisdiction an equal share based on the regional income distribution, the draft allocation scenario moves each jurisdiction 100 percent toward the regional income distribution. It is focused on promoting an equitable regional distribution for future housing production, but does not consider existing concentrations of low-income households in a community or take steps to reduce them.

In contrast, the first two alternative income allocation scenarios give each jurisdiction either 150 or 175 percent of the difference between their 2000 household income distribution and the 2000 regional household income distribution.

The first step in this process is to determine the difference between the regional proportion of households in an income category and the jurisdiction's proportion for that category. This difference is then multiplied by either 150 or 175 percent to determine an "adjustment factor." Finally, this adjustment factor is added to the jurisdiction's initial proportion of households in the income category, which results in the total share of the jurisdiction's housing unit allocation that will be in that income category.

Using the 175 percent factor and the City of Oakland's very low income category as an example, 36 percent of households in Oakland were in this category, while the regional total was 23 percent.

City	Jurisdiction Proportion	Regional Proportion	Difference	Multiplier	Adjustment Factor	Total Share
Oakland	36	23	-13	175%	-23	13

The difference between 23 and 36 is -13. This is multiplied by 175 percent for a result of -22.75 (rounded to 23). This is then added to the city's original distribution of 36 percent, for a total share of 13 percent. A similar calculation for Piedmont, which has a relatively low proportion of households in the "very low" income category yields the following results:

City	Jurisdiction Proportion	Regional Proportion	Difference	Multiplier	Adjustment Factor	Total Share	
Piedmont	9	23	14	175%	24	33	

As shown above, those jurisdictions that have a larger proportion of households in an income category will receive a smaller allocation of housing units in that category. Conversely, those jurisdictions that have a relatively low proportion of households in a category would receive a higher allocation of housing units in that category.

The effect of these allocation scenarios is to change the income distribution in each jurisdiction to more closely match the regional distribution by taking both a jurisdiction's existing conditions and future development into account. By addressing existing concentrations of low-income households, these scenarios more aggressively promote an equitable regional income distribution. The multiplier determines how aggressively the scenario functions; the higher the multiplier, the more aggressive.

#### Alternative 2: Tiered Adjustment Based on Concentration of Low Income Households

The third alternative scenario is similar to the first two alternatives in that it uses existing conditions to move each jurisdiction closer to the regional income distribution. The key difference in this scenario is that jurisdictions are first separated into three groups based on the jurisdiction's proportion of low- and very low-income households compared to the proportion for the region. The three groups correspond to three different multipliers (like the 175 percent example used above) that determine how far a jurisdiction must move toward the regional income distribution.

The first step in this process is to add together the percentages of very low and low income households in a jurisdiction. Each jurisdiction's result is then compared to the regional proportion. Based on this comparison, jurisdictions are put into one of three categories:

- Low concentration: where less than 25 percent of total households have very low or low incomes.
- Moderate concentration: where more than 25 and less than 45 percent of total households have very low or low incomes.
- High concentration: where more than 45 percent of total households have very low or low incomes (San Pablo is the highest in the region at 65 percent).

Jurisdictions in the low concentration category, such as Livermore, Pleasanton, Clayton, Danville, and Los Altos Hills move the furthest (185 percent) toward the regional average. Those in the moderate concentration category, such as Albany, Walnut Creek, Napa, San Francisco, and San Jose, move 180 percent and those in the high concentration category, which includes Berkeley, Oakland, Richmond, San Rafael, Gilroy, and Sebastopol, move 175 percent.

Once the multiplier for the jurisdiction has been determined, the steps for determining the jurisdiction's share of housing units in each income category is the same as the one for the first alternative methodology described above.

Taking the City of Piedmont example used above, this scenario would result in a higher share of very low-income units for the city because the city falls into the low concentration category and has a multiplier of 185 percent. Here, the share is 35 percent compared to 33 percent in the example above.

City	Jurisdiction Proportion	Regional Proportion	Difference	Multiplier	Adjustment Factor	Total Share
Piedmont	9	23	14	185%	26	35

The result of this allocation scenario is that jurisdictions with a low concentration of low and very low income households get higher allocations of very low- and low-income housing units. Those jurisdictions that already have a high concentration of very low- and low-income households are allocated fewer units in these categories.

As in the first alternative scenario, the effect of this allocation scenario is to change the income distribution in each jurisdiction to more closely match the regional distribution by taking both a jurisdiction's existing conditions and future development into account. This third alternative scenario specifically looks at the proportion of very low- and low-income households in a jurisdiction as the factor for determining how far the jurisdiction must move toward the regional average income distribution.

#### 3. Spheres of Influence

Each local jurisdiction with the land-use permitting authority in a "Sphere of Influence" should plan for the housing needed to accommodate housing growth, existing employment and employment growth in such "Sphere of Influence" areas. A 100 percent allocation of the housing need to the jurisdiction that has land use control over the area would ensure that the jurisdiction that plans for accommodating the housing units also receives credit for any built units during the RHNA period. In Marin, the cities and county have agreed to equally (50/50) share responsibility for units assigned to sphere's of influence areas.

#### 4. Transfer of Units

After the initial allocation of the regional housing need, a local jurisdiction may request approval to transfer units with willing partner(s), in a way that maintains total need allocation amongst all transfer parties, maintains income distribution of both retained and transferred units, and includes package of incentives to facilitate production of housing units. This transfer rule would allow the transfer of allocated housing need between willing jurisdictions in conjunction with financial resources, while maintaining the integrity of the state's RHNA objectives by preventing any jurisdiction from abdicating its responsibility to plan for housing across all income categories. Transfers done in this manner may facilitate increased housing production in the region.

#### 5. Subregions

The County of San Mateo, in partnership with all twenty cities in the county, has formed a subregion, as allowed by state statute. ABAG will assign a share of the regional need to the subregion "in a proportion consistent with the distribution of households" in Projections 2007. The subregion is then responsible for completing its own RHNA process that is parallel to, but separate from, the regional RHNA process. The subregion will create its own methodology, issue draft allocations, handle the revision and appeal processes, and then issue final allocations to the members of the subregion. The rules on how to handle the subregion allocation in the event the subregion fails are contained in the attached RHNA technical document.

S
<b>O</b>
2
Ŧ
Ø
Ξ
9
ц.
~
-
>
E
2
S
2
Ú.
-
ğ
E.
0
Ũ
Ē.

Existing % into 3 Groups

						Existi	Existing Percentages Plus	ages Plus		Exist	Existing Percentages Plus	Itages Plu	s	Existing % into 3 Groups Higher Existing Concentration Gets	Existing % into 3 Groups ther Existing Concentratio	3 Groups Icentration	1 Gets
	-	Avera	Average Regional	nal Percentage	lage	150% Reg	50% Regional Average Minus Exist	age Minu:	s Exist	175% Re	175% Regional Average Minus Exist	rage Minu	is Exist	Lower	Lower Allocation of Affordable	of Afford	able
		ă	<b>Draft Allocatio</b>	tion Proposal	sal	150%	150% Toward Regional Average	egional A	verage	175%	175% Toward Regional Average	egional A	werage		<b>Tiered Adjustment</b>	ustment	
		Very				Very				Very				Very			
	Need	<50%	-80%	Mod <120%	Above Mod	Low <50%	Low <80%	Mod <120%	Above	Low <50%	Low <80%	Mod <120%	Above	Low <50%	Low <rn%< th=""><th>Mod &lt;120%</th><th>Above</th></rn%<>	Mod <120%	Above
ALAMEDA	2,075	469	343	399	864	483	339	395	858	485	338	394	A5A	ARR	797	306	CAR BR7
ALBANY	262	59	43	50	109	61	42	49	111	61	41	49	112	19	41	49	112
BERKELEY	2,714	614	449	521	1,130	448	468	579	1,218	361	479	608	1.266	362	479	612	1.272
DUBLIN	3,440	778	569	661	1,432	1,013	648	666	1,115	1,121	069	699	096	1.171	202	674	901
EMERYVILLE	1,637	348	254	295	640	283	243	293	716	249	239	293	757	250	239	295	761
FREMONT	a 4,827	1,092	799	927	2,009	1,357	923	947	1,604	1,476	988	957	1.406	1.533	1.012	9 <u>6</u> 8	1.332
HAYWARD	3,348	757	554	643	1,394	758	506	585	1,499	751	484	556	1.557	754	479	554	1.576
LIVERMORE	3,423	774	567	657	1,425	958	636	674	1,157	1,040	673	682	1,028	1,080	686	690	679
NEWARK	868	203	149	172	374	246	161	164	327	265	168	160	304	270	169	160	301
OAKLAND	17,099	3,867	2,831	3,284	7,117	2,766	2,595	3,521	8,208	2,189	2,487	3,641	8,782	2,197	2,486	3,666	8,825
PIEDMONT	37	8	9	7	16	11	8	6	6	12	10	10	2	13	10	11	4
PLEASANTON	3,688	834	610	708	1,535	1,087	753	772	1,078	1,204	827	804	853	1,258	855	822	766
SAN LEANDRO	1,874	424	310	360	780	423	280	330	841	419	267	315	874	420	263	314	885
UNION CITY	2,011	455	333	386	837	539	382	389	702	576	408	390	637	587	413	393	626
UNINCORPORATED	2,240	507	371	430	932	539	360	416	925	549	356	409	925	554	355	411	929
ALAMEDA COUNTY	48,474	11,189	8,190	9,502	20,593	10,972	8,344	9,788	20,368	10,711	8,361	9,831	20,571	11,000	8,531	10,013	20,133
ANTIOCH	2,302	521	381	442	958	521	357	400	1.023	516	347	380	1.059	518	344	378	1 071
BRENTWOOD	2,807	635	465	539	1,168	708	458	509	1,132	738	457	493	1,118	748	456	494	1 120
CLAYTON	145	33	24	28	60	42	30	30	42	47	33	31	33	49	35	32	30
CONCORD	3,120	206	517	599	1,299	672	466	536	1,445	649	443	505	1,524	648	438	502	1.546
DANVILLE	554	125	92	106	230	166	113	127	147	185	124	138	106	194	129	143	06
EL CERRITO	522	118	86	100	217	114	11	26	233	112	73	96	242	112	72	96	245
HERCULES	431	67	71	83	179	124	71	73	163	136	71	69	156	139	71	68	155
LAFAYETTE	358	81	28	69	149	102	71	75	110	112	22	78	91	116	80	80	83
MARTINEZ	1,046	236	173	201	435	251	168	183	444	255	166	174	449	258	166	174	452
	222	00	10	43	93	63	42	47	20	69	45	49	59	72	46	20	55
	REI	103	124	144	312	198	119	104	328	210	118	83	338	214	117	80	341
	177	000	5	42	76	2	45	51	61	20	49	55	46	73	51	57	40
	005	60	10	55	128	76	48	49	133	78	47	45	136	79	47	44	137
PILISBURG	2,022	457	335	388	842	397	283	352	989	363	259	334	1,066	365	258	336	1,072
PLEASANI HILL	282	134	86	114	247	145	100	104	244	150	101	66	243	151	101	98	244
RICHMOND	2,781	624	457	530	1,149	462	376	525	1,396	376	337	523	1,524	378	337	526	1,532
SAN PABLO	283	8	47	54	118	35	40	56	152	20	37	57	169	20	37	57	170
SAN RAMON	3,292	744	545	632	1,370	994	637	676	987	1,110	686	698	798	1,163	704	711	726
WALNUT CREEK	2,208	499	365	424	919	510	351	420	927	510	346	417	935	513	344	420	940
UNINCORPORATED	3,662	828	606	703	1,524	844	622	708	1,489	844	632	711	1,476	848	633	716	1.480
CONTRA COSTA COUNTY	27,601	6,242	4,569	5,301	11,489	6,489	4,476	5,122	11,516	6,391	4,455	5,091	11.665	6.656	4.466	5.063	11.530

# Income Category Alternatives

Introduction fragmentant in the standard fragment Armange         The Armange Transmoother fragment Armange Transmoother fragment Armange Transmoother and Armange		•	Aver	age Regio	Average Regional Percentage	otage	150% Reg	ional Ave	150% Regional Average Minus Exist	s Exist	175% Rei	gional Ave	175% Regional Average Minus Exist		Lower Allocation of Affordable	Lower Allocation of Affordable	entration of Afforda	Gels Die
Tand         Unit         Unit <thunit< th="">         Unit         Unit         <th< th=""><th></th><th>_</th><th>ă</th><th>aft Alloca</th><th>atton Prop</th><th>leso</th><th>150%</th><th>Toward F</th><th>Regional A</th><th>Verage</th><th>175%</th><th>Toward R</th><th>egional A</th><th>verage</th><th>Ë</th><th>ered Adju</th><th>stment</th><th></th></th<></thunit<>		_	ă	aft Alloca	atton Prop	leso	150%	Toward F	Regional A	Verage	175%	Toward R	egional A	verage	Ë	ered Adju	stment	
Moto         Give         Color         Color <thc< th=""><th></th><th>Total</th><th>Low</th><th>Low</th><th>Mod</th><th>Above</th><th>Very Low</th><th>Low</th><th>Mod</th><th>Above</th><th>Very Low</th><th>Low</th><th>Mod</th><th>Above</th><th>Very Low</th><th>Low</th><th>Mod</th><th>Above</th></thc<>		Total	Low	Low	Mod	Above	Very Low	Low	Mod	Above	Very Low	Low	Mod	Above	Very Low	Low	Mod	Above
22.0         3         4         5         1         7         7         7         6         6         7         6         7         6         6         7         6         7         6         6         7         6         7         6         7         6         7         6         7         6         6         7         6         6         7         6         7         16         17         16         16         17         16         16         17         16         16         17         16         16         17         16         16         17         16         16         17         16         16         17         16         16         17         16         16         17         16         17         16         17         16         17         16         17         16         17         16         17         16         17         16         17         16         17         16         17         16         17         16         17         16         17         16         17         16         17         16         17         16         17         16         17         16		Deen	×۵۵۵	<80%	<120%	pow	<50%	<80%	<120%	Mod	<50%	<80%	<120%	pow	<50%	<80%	<120%	Mod
722         16         17         44         16         17         44         16         17         44         16         17         44         16         17         44         16         17         44         16         17         44         16         17         44         16         1	JELVEUEKE	67 C	0	4	Q	10	7	S	9	7	7	9	9	9	7	9	9	9
17         16         10         14         30         16         10         13         34         15         36         15         36         15         36         15         36         15         36         15         36         15         36         15         36         15         36         15         36         15         36         15         36         15         36         37         30         35         36         37         30         35         36         37         30         35         36         37         30         36         57         36         37         30         37         30         37         30         35         36         37         30         37         30         37         30         33         31         31         31         31         31         31         31         32         33         31         31         32         33         31         31         32         33         33         33         33         33         33         33         33         33         33         33         33         33         33         33         33         33         33         33	CORTE MADERA	232	22	38	44	<del>3</del> 6	61	37	44	06	64	37	43	88	65	37	43	88
27.0         13         101         110         256         410         301 <td>-AIRFAX</td> <td>72</td> <td>16</td> <td>12</td> <td>14</td> <td>30</td> <td>16</td> <td>10</td> <td>13</td> <td>ह</td> <td>15</td> <td>8</td> <td>12</td> <td>36</td> <td>15</td> <td>8</td> <td>12</td> <td>36</td>	-AIRFAX	72	16	12	14	30	16	10	13	ह	15	8	12	36	15	8	12	36
1.31         61         61         61         100         70         22         64         53         16         68         50         100         70         25         64         31         20 <t< td=""><td>ARKSPUR</td><td>612</td><td>138</td><td>101</td><td>118</td><td>255</td><td>142</td><td>93</td><td>119</td><td>258</td><td>143</td><td>06</td><td>119</td><td>260</td><td>144</td><td>89</td><td>120</td><td>262</td></t<>	ARKSPUR	612	138	101	118	255	142	93	119	258	143	06	119	260	144	89	120	262
141         241 <td><b>ΔΙΓΓ ΛΑΓΓΕΥ</b></td> <td>278</td> <td>63</td> <td>46</td> <td>53</td> <td>116</td> <td>68</td> <td>20</td> <td>60</td> <td>100</td> <td>20</td> <td>52</td> <td>64</td> <td>92</td> <td>02</td> <td>52</td> <td>65</td> <td>91</td>	<b>ΔΙΓΓ ΛΑΓΓΕΥ</b>	278	63	46	53	116	68	20	60	100	20	52	64	92	02	52	65	91
108         6         4         5         11         7         5         6         7         6         5         7         6         5         7         6         5         7         6         5         7         6         5         7         6         7         6         7         6         5         7         8         6         7         6         5         7         8         6         7         6         7         6         7         6         7	IOVATO	1,431	324	237	275	596	320	212	259	640	315	200	252	664	315	198	252	672
108         24         18         21         45         24         16         20         45         24         16         23         31         75         23         31         75         23         33         35         35         35         35         35         35         35         35         35         35         35         35         35         33         31         33         36         33         35         3	SOSS	25	9	4	5	11	7	5	2	8	7	9		7	6	9	1 LC	1 1
1680         333         238         249         44         312         241         314         241         314         241         315         314         315         314         314         314 <td>SAN ANSELMO</td> <td>108</td> <td>24</td> <td>18</td> <td>21</td> <td>45</td> <td>24</td> <td>18</td> <td>20</td> <td>45</td> <td>24</td> <td>18</td> <td>202</td> <td>45</td> <td>24</td> <td>ο α</td> <td>20</td> <td>- 4</td>	SAN ANSELMO	108	24	18	21	45	24	18	20	45	24	18	202	45	24	ο α	20	- 4
178         40         29         34         74         46         22         35         46         35         36         61         49         33         36         31         33         36         36         33         36         36         33         36         36         33         36         36         33         3	SAN RAFAEL	1,559	353	258	299	649	312	241	311	695	288	233	317	704	280	233	310	
123         25         20         21         130         22         26         41         27         23         23         33         32         33         33         33         33         33         33         33         33         33         33         33         33         33         33         34	SAUSALITO	178	40	29	34	74	46	32	35	65	48	3 5	36		07	<b>6</b>	50	+7 /
663         155         113         284         160         113         234         150         132         140         233         150         131         234         131         234         131         234         132         143         231         131         231         131         231         131         231         131         231         131         231         131         231         131         231         131         231         131         231         131         231         131         231         131         231         131         231         131         231         131         231         131         231         131         231         131         231         131 <td>TIBURON</td> <td>123</td> <td>28</td> <td>20</td> <td>24</td> <td>51</td> <td>34</td> <td>22</td> <td>26</td> <td>41</td> <td>25</td> <td>3 8</td> <td>8 8</td> <td>5 4</td> <td></td> <td>3 5</td> <td>88</td> <td>8</td>	TIBURON	123	28	20	24	51	34	22	26	41	25	3 8	8 8	5 4		3 5	88	8
6.325         1.204         082         1.023         2.217         1,196         8.3         1,011         2.246         1,203         8.15         1,012         2.162         1,101         8.15         1,013         8.15         1,013         8.15         1,011         1,013         2.16         1,11         1,36           11,817         825         1,7         1,1         1,3         281         160         11,1         123         287         160         11,1         136           11,817         825         17         1,4         12         1,4         13         287         160         11,1         136           11,817         823         141         104         123         23         43         361         673         433         250         673         146         160         111         136         147         125         147         126         137         1465         8,73         1465         8,73         1465         8,73         510         150         151         151         151         151         151         151         151         151         151         151         151         151         151         151         151<	<b>JNINCORPORATED</b>	683	155	113	131	284	160	119	142	263	161	123	148	25.3	16.0	24 C	150	40 10
682         157         115         133         288         160         112         134         287         159         157         150         111         136           1.91         20         15         17         37         17         12         17         13         146         15         17         30         137         306         139         233         433         234         15	AARIN COUNTY	6,325	1,204	882	1,023	2,217	1,196	843	1,041	2,246	1,210	861	1,072	2,182	1,187	825	1,058	2,277
90         20         15         17         31         17         43         16         17         46         16         10	MERICAN CANYON	692	157	115	133	288	160	112	134	287	150	112	135	787	160	• • •	901	000
1,3,17         1,3,3         317         368         798         439         261         823         455         28         435         357         339         410         280         359         410         280         359         410         280         359         410         280         359         410         280         350         451         317         315         13	ALISTOGA	08	20	15	17	37	17	12	17	43	16	10	2 <u>7</u>	46	B 4		001	207
116 $56$ 19 $22$ $43$ $24$ $23$ $440$ $240$ $230$ 84         19         14         16 $35$ 17         14 $15$ $37$ $165$ $36$ $15$ $16$ $36$ $17$ $1467$ $36$ $17$ $1467$ $36$ $17$ $1466$ $35$ $17$ $1466$ $833$ $550$ $672$ $1469$ $835$ $550$ $676$ $13$ $3.224$ $797$ $560$ $771$ $1467$ $127$ $320$ $7166$ $473$ $240$ $7301$ $8166$ $740$ $617$ $122$ $3.509$ $7605$ $4.7302$ $2922$ $3.374$ $7$ $740$ $617$ $122$ $3.509$ $7605$ $4.7302$ $2922$ $3.374$ $7$ $7301$ $8016$ $7301$ $201$ $201$ $201$ $201$ $201$ $201$ $201$ $201$ $201$ $201$ <	IAPA	1.917	433	317	368	798	430	204	361	872	120	2 00	257		2 9	200	0 0	0 <del>1</del>
$\mathbf{k}_{1}$ $\mathbf{i}_{2}$ $\mathbf{i}_$	ST HELENA	116	26	10	66	48	e e	5	5 6	170	0 7 7	607	100	6.9	440	780	359	846
Were         Hold         Hold <t< td=""><td></td><td></td><td>9 6</td><td>2 7</td><td>4 4</td><td>2 L</td><td>9 5</td><td>3 :</td><td>3 :</td><td>ç ;</td><td>97</td><td>N2 -</td><td>24</td><td>43</td><td>29</td><td>21</td><td>24</td><td>43</td></t<>			9 6	2 7	4 4	2 L	9 5	3 :	3 :	ç ;	97	N2 -	24	43	29	21	24	43
ALC         141         104         120         120         163         173         112         124         217         175         133         125         550         676         133         125         550         676         133         126         133         126         130         131         125         133         1355         550         676         133         136         133         136         133         136         133         136         133         136         133         136         133         136         133         136         133         136         133         136         133         136         133         136         133         136         133         136         133         136         133         136         133         136         133         136         133         136         130         130         130         131         130         131         130         131 </td <td></td> <td></td> <td></td> <td>4</td> <td>01</td> <td>8</td> <td>1</td> <td>14</td> <td>5</td> <td>37</td> <td>15</td> <td>15</td> <td>15</td> <td>38</td> <td>15</td> <td>15</td> <td>15</td> <td>39</td>				4	01	8	1	14	5	37	15	15	15	38	15	15	15	39
$J_{00}A_{0}$ $j_{1}S_{0}$ $517$ $j_{4}G_{0}$ $673$ $j_{4}G_{0}$ $833$ $550$ $672$ $j_{4}G_{0}$ $835$ $550$ $676$ $7_{2}01$ $8_{1}G_{0}$ $550$ $673$ $7_{4}G_{0}$ $7_{2}G_{0}$ $8_{1}G_{0}$ $7_{2}G_{0}$ $7_{2}G_{0}$ $8_{1}G_{0}$ $7_{2}G_{0}$ $8_{1}G_{0}$ $7_{2}G_{0}$	NINCORPORATEU	070	141	104	120	260	163	109	123	231	173	112	124	217	175	113	125	215
TM         40,464         9,158         6,703         7,778         16,855         8,750         7,061         8,397         16,285         8,477         7,268         8,695         16,055         8,464         7,301         8,116           16,270         4,132         3,024         3,503         7,605         4,132         3,024         3,509         7,605         4,132         3,022         2,933         3,374           740         167         122         142         308         166         134         331         163         102         130         344         164         101         130           740         167         122         142         308         166         134         331         163         102         130         346         730         2,923         3374           740         167         122         144         463         300         208         231         212         214         214         463         311         216         216         216         216         217         216         216         217         212         213         211         216         216         216         216         216         213	IAPA COUNTY	9'054	161	583	677	1,467	824	561	673	1,465	833	550	672	1,469	835	550	676	1,476
18,270         4,132         3,024         3,509         7,605         4,202         2,930         3,382         7,667         4,302         2,923         3,374           740         167         122         142         308         166         109         133         163         102         130         344         164         101         130           740         167         122         142         308         166         109         134         331         163         102         130         344         164         101         130           740         167         17         13         15         32         231         277         749         310         216         282         231         277         749         310         216         286         272         231           77         17         13         15         32         231         110         132         217         749         310         216         286         137           833         121         88         102         222         133         21         127         244         460         96         117         147         96         66 </td <td>SAN FRANCISCO COUNTY</td> <td>40,494</td> <td>9,158</td> <td>6,703</td> <td>7,778</td> <td>16,855</td> <td>8,759</td> <td>7,061</td> <td>8,387</td> <td>16,285</td> <td>8,477</td> <td>7,268</td> <td>8,695</td> <td>16,055</td> <td>8,464</td> <td>7,301</td> <td></td> <td>6,080</td>	SAN FRANCISCO COUNTY	40,494	9,158	6,703	7,778	16,855	8,759	7,061	8,387	16,285	8,477	7,268	8,695	16,055	8,464	7,301		6,080
740         167         122         142         308         166         109         134         331         163         102         130         344         164         101         130           1,112         252         164         214         463         300         208         224         381         322         220         229         342         164         101         130           1,112         255         164         214         463         300         208         224         381         322         220         229         342         166         66         77           7         17         13         15         32         23         111         192         149         71         147         96         66         77           7         17         13         15         32         23         111         192         149         71         147         96         66         77           633         121         88         13         112         192         149         460         91         117         147         96         66         77           633         121         12	SAN MATEO COUNTY	18,270	4,132	3,024	3,509	7,605	4,132	3,024	3,509	7,605	4,292	2,930	3,382	7,667	4,302	2,923	3,374	7,671
1,112         252         184         214         463         300         208         224         381         322         220         344         101         130           7,112         555         565         59         69         81         322         220         323         221         231         216         565         311         216         565         311         216         565         311         216         312         265         266         117         147         96         117 $40$ 9         71         12         222         231         249         460         232         249         460         232         244         460         247         470         460         247         246         266         247         269         241         261         241         261         241	AMPBELL	740	167	122	142	308	166	109	134	331	163	100	100		101			
1,805         56         50         50         50         52         53         73         53         52         53         73         44         71         96         66         77           633         121         13         15         32         23         17         19         19         26         19         21         12         26         19         21         14         17         147         147         147         147         147         147         147         147         147         143         249         460         49         11         12         23         249         460         460         117         147         248         249         460         460         117         149         160         211         27         248         25         249         410         257         248         251         249 <td>UPERTINO</td> <td>1.112</td> <td>252</td> <td>184</td> <td>214</td> <td>463</td> <td>300</td> <td>auc</td> <td>LC-</td> <td></td> <td>500</td> <td>201</td> <td>000</td> <td>440</td> <td>104</td> <td>101</td> <td>130</td> <td>348</td>	UPERTINO	1.112	252	184	214	463	300	auc	LC-		500	201	000	440	104	101	130	348
302         68         50         58         126         85         59         50         69         56         71         210         200         511         210         200         511         210         200         50         56         71         71         71         71         71         71         71         71         71         71         71         71         71         71         71         50         511         210         200         511         210         200         211         210         200         211         210         200         211         210         200         211         210         200         211         210         200         211         210         200         211         210         200         211         210         200         211         210         200         211         210         200         211         210         200         211         210         200         211         210         200         211         210         200         211         210         200         211         211         210         210         210         210         210         210         210         210	ILROY	1,585	358	262	304	660	328	234	277	100	310	216	677	042 706	328	777	231	335
77         17         13         15         32         23         17         17         13         15         32         23         17         17         19         16         17         19         16         17         19         16         17         19         16         17         19         16         17         14         96         16         17 <b>633</b> 121         88         102         222         138         93         111         192         145         460         991         733         449         460 <b>40</b> 9         7         8         16         11         8         9         111         192         145         17         147         96         160         71 <b>1,329</b> 300         220         255         553         315         242         249         553         17         145         733         249         460 <b>1,329</b> 300         220         255         553         315         242         248         733         127         148         27         128         86         733         131         135	OS ALTOS	302	68	50	23	126	85	2	80		2	017	C07	06/	10	QI.7		800
633         121         88         102         222         138         93         111         192         145         96         17         147         96         117           2,621         593         434         503         1,091         683         442         474         1,022         721         449         460         991         733         449         460           40         9         7         8         16         11         8         9         11         12         9         10         833         449         460         91         733         449         460         91         733         449         60         91         733         449         60         91         733         449         60         91         733         449         60         91         714         517         248         733         449         60         91         714         515         248         733         749         746         515         248         736         714         714         714         714         715         733         736         7140         736         7140         736         736         736	LOS ALTOS HILLS	11	17	13	15	32	23	17	61	3 ¢	36 25	5 ¢	5 5	5 5	00 90	8 9	2 6	64 4
2,621         593         434         503         1,091         683         442         474         1,022         721         449         460         911         733         449         460           40         9         7         8         16         11         8         9         11         12         9         10         8         133         49         460           40         9         7         8         16         11         8         9         11         12         9         10         8         133         49         460           40         9         73         456         553         315         242         249         552         319         255         247         509         321         257         248           2,756         6,14         1,956         600         417         5,166         6,381         13,444         7,465         7,361         5,166         5,877         14,4855         7,378         5,140         5,883         1           33,256         7,522         5,506         6,381         13,444         7,462         5,265         6,046         14,485         7,361         5,166	OS GATOS	633	121	88	102	222	138	63	111	192	145	96	115	177	147	e 90	117	175
40         9         7         8         16         11         8         9         11         12         9         10         8         13         9         11           1,329         300         220         255         553         315         242         249         522         319         255         247         509         321         257         248           2,754         623         456         529         1,146         611         429         518         1,195         600         417         513         1,224         601         414         515           3,716         840         615         714         1,547         879         679         789         7,361         5,166         6,383         1,405         5,361         5,166         6,383         1,006         840           33,256         7,522         5,506         6,388         13,844         7,462         5,265         6,046         14,485         7,361         5,166         6,383         1,006           33,257         7523         5,506         6,388         1,370         889         714         8,27         1,4855         7,378         5,140         5,883	ILPITAS	2,621	593	434	503	1,091	683	442	474	1,022	721	449	460	166	733	949	460	080
1,320         300         220         255         553         315         242         249         522         319         255         247         509         321         257         248           2,764         623         456         529         1,146         611         429         518         1,195         600         417         513         1,224         601         414         515           3,716         840         615         714         1,547         879         679         730         889         714         827         1,286         896         720         840           3,716         840         615         7,14         1,547         879         670         840         730         890         714         815         7,378         5,140         5,803         1           3,3,256         7,522         5,506         6,388         13,844         7,462         5,265         6,046         14,485         7,361         5,166         6,383         1,006           3,3,215         6,3         1,351         989         1,147         2,487         1,365         3,36         1,009         2,719         1,306         938         1,006	IONTE SERENO	40	6	7	8	16	11	8	ð	1	12	6	10	8	13	6	11	200
2.764       6.23       456       5.29       1,146       611       429       518       1,195       600       417       513       1,224       601       414       515         3.716       840       615       714       1,547       879       679       789       1,370       889       714       827       1,286       896       720       840         3.716       840       615       714       1,547       879       679       7361       5,166       5,803       72       840       720       840         3.3.269       7,522       5,506       6,388       13,844       7,462       5,265       6,046       14,485       7,361       5,817       14,855       7,378       5,140       5,883       1 $5.974$ 1,351       989       1,147       2,487       1,328       955       1,009       2,719       1,306       938       1,006 $277$ 63       46       53       1055       2,636       1,304       942       1,009       2,719       1,306       938       1,006 $277$ 63       46       53       736       65       73       75       75	IORGAN HILL	1,329	300	220	255	553	315	242	249	522	319	255	247	509	321	257	248	508
3.716         840         615         714         1,547         879         679         730         889         714         827         1,286         896         720         840           33.259         7,522         5,506         6,388         13,844         7,462         5,265         6,046         14,485         7,361         5,166         5,877         14,855         7,378         5,140         5,883         1           5.974         1,351         989         1,147         2,487         1,328         955         1,055         2,636         1,304         942         1,009         2,719         1,306         938         1,006           277         63         46         53         1,055         2,636         1,304         942         1,009         2,719         1,306         938         1,006           277         63         46         53         66         75         85         65         73         55         88         7,06         938         1,006           277         53         7,09         1,910         1,087         746         824         1,927         1,1102         743         743         742         745         745	IOUNTAIN VIEW	2,764	623	456	529	1,146	611	429	518	1,195	600	417	513	1.224	601	414	515	1 235
33,259         7,522         5,506         6,388         13,844         7,462         5,265         6,046         14,485         7,361         5,166         5,877         14,855         7,378         5,140         5,893         1           5,974         1,351         989         1,147         2,487         1,328         955         1,055         2,636         1,304         942         1,009         2,719         1,306         938         1,006           277         63         46         53         116         78         56         65         73         55.         88         67         76           705         150         1,037         759         811         1,908         1,087         746         824         1,927         1,112         743         742         795           706         36         31         67         34         26         33         1,712         743         742         795           706         36         31         67         34         26         34         26         33         34         26         33         33           706         36         31         67         34         26	ALO ALTO	3,716	840	615	714	1,547	879	679	789	1,370	889	714	827	1.286	896	720	840	1 275
5,974         1,351         989         1,147         2,487         1,328         955         1,055         2,636         1,304         942         1,009         2,719         1,306         938         1,006           277         63         46         53         115         78         56         66         75         85         65         73         55         88         1,016           4,084         1,031         759         1,116         746         824         1,927         1,102         743         795         1,911         742         795           160         36         26         32         67         34         26         33         67         34         76	AN JOSE	33,259	7,522	5,506	6,388	13,844	7,462	5,265	6,046	14,485	7,361	5,166	5.877	14.855	7.378	5.140		4 005
277         63         46         53         115         78         56         65         73         55         88         67         76         73         55         88         67         76         76         76         76         76         76         76         76         76         76         76         76         76         77         7102         743         795         1,111         742         795         1,111         742         795         1,011         742         795         1,011         742         795         1,011         742         795         1,011         742         795         1,011         742         795         1,011         742         795         34         76         33         67         34         76         33         67         34         76         33         68         34         76         33         795         34         76         33         795         34         76         33         795         34         76         33         795         73         705         73         705         73         705         713         715         715         715         705         715         715<	ANTA CLARA	5,974	1,351	989	1,147	2,487	1,328	955	1,055	2,636	1,304	942	1.009	2.719	1.306	938		2 748
<b>4,584</b> 1,03/ 759 881 1,908 1,087 746 824 1,927 1,102 743 795 1,943 1,111 742 795 1,043 1,111 742 795 160 36 26 31 67 35 26 32 67 34 26 33 67 34 26 33	ARATOGA	277	63	46	53	115	78	58	99	75	85	65	73	55.	BB.	57 67	76	24
<b>160</b> 36 26 31 67 35 26 32 67 34 26 33 67 34 26 33	ONNTVALE	4,084	1,037	69/	881	1,908	1,087	746	824	1,927	1,102	743	795	1,943	1,111	742	795	1.955
	NINCORPORATED	160	36	26	31	67	35	36	33	57	1.0	00	ç	5				

S, CO
đ
s
السول ا
Ċ.
Ĉ
<b>.</b>
ж.
-
1
-
-
C
5
$\simeq$
0
Ð
at
0
13
$\sim$
d)
Ĕ.
Ĕ
Ĕ.
COM
Ĕ.

						Existi	ng Percer	Existing Percentages Plus	S	Exis	Existing Percentages Plus	ntages Plu	ន	Existii Hiaher Ex	Existing % into 3 Groups her Existing Concentratio	Existing % into 3 Groups Higher Existing Concentration Gets	n Gets
		Avera	Average Regior	nal Percentage	ntage	150% Re(	pional Ave	150% Regional Average Minus Exist	is Exist	175% Re	175% Regional Average Minus Exist	erage Minu	us Exist	Lower	Allocation	Lower Allocation of Affordable	able
		ă	<b>Draft Allocation Proposal</b>	tton Prop	losal	150%	Toward F	150% Toward Regional Average	Average	175%	175% Toward Regional Average	tegional A	Average		<b>Fiered Adjustment</b>	ustment	
		Very				Very				Very				Verv			]
	Total	Low	Low	Mod	Above	Low	Low	Mod	Above	Low	Low	Mod	Above	Low	Low	Mod	Above
	Need	<50%	<80%	<120%	Mod	<50%	<80%	<120%	Mod	<50%	<80%	<120%	Mod	<50%	<80%	<120%	Mod
	505	114	84	26	210	132	91	100	183	139	95	102	170	141	96	103	168
	692	157	115	133	288	177	101	121	293	186	95	116	296	188	63	115	298
2	3,665	829	607	704	1,526	839	568	665	1,594	836	550	645	1,634	840	546	646	1.649
	1,159	262	192	223	482	222	177	204	556	200	170	194	594	201	170	196	597
	289	135	66	115	248	158	104	66	235	168	108	91	230	171	108	06	230
	2,758	624	456	530	1,148	686	451	499	1,121	711	451	484	1,111	720	450	485	1,114
	3,094	200	512	594	1,288	699	485	572	1,367	648	474	561	1,411	647	471	563	1,426
Ģ	2	21	16	18	39	23	16	17	37	24	16	17	37	24	16	17	37
_	12,682	2,841	2,080	2,413	5,229	2,907	1,993	2,277	5,386	2,990	1,998	2,236	5,338	2,932	1,950	2,214	5,519
	ROS	114	84	07	010	UC DC	70	20	100		ľ	ľ			ł	;	
	040	10	5 8	5 6	217	C	0	31	CC7	<b>α</b> 5	5)	97	248	85	75	97	250
	376	8	63	/3	157	94	22	68	159	<del>3</del> 8	2	99	160	66	53	65	161
	394	6	99	76	165	87	61	69	181	84	58	65	189	84	58	65	192
	2,058	466	341	395	857	524	364	390	781	549	376	388	745	556	379	390	742
	1,897	429	314	364	290	445	294	341	816	449	286	329	832	453	284	329	839
	6,673	1,509	1,105	1,282	2,778	1,539	1,053	1,183	2,899	1,540	1,031	1,134	2,969	1,548	1,025	1,131	2,996
	168	38	28	32	20	33	27	29	78	31	27	28	83	31	27	28	83
	336	76	56	2	140	71	54	65	145	68	53	65	148	68	53	99	150
	.669	158	116	134	291	181	123	133	262	191	128	132	248	194	128	133	247
0	1,320	299	219	254	549	306	214	253	547	306	213	253	548	308	212	254	551
	14,430	3,263	2,389	2,772	6,006	3,377	2,324	2,627	6,103	3,395	2,319	2,612	6,104	3,242	2,166	2,396	5,799
	230,743 52,183	52,183	38,197	44,319	96,044	52,183	38,197	44,319	96,044	52,183	38,197	44.319	96.044	52.166	38.151	44.327	96,098
										•				***			~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~

RIO VISTA SUISUN CITY VACAVILLE VALLEJO UNINCORPORATED SOLANO COUNTY FAIRFIELD BENICIA DIXON

UNINCORPORATED SONOMA COUNTY ROHNERT PARK SANTA ROSA SEBASTOPOL HEALDSBURG PETALUMA CLOVERDALE COTATI MINDSOR SONOMA

REGION

		1	2	3
	Draft	Existing TOD	Existing TOD	No TOD
	Allocation	Less TOD	Existing TOD	NOTOD
	40% HH Growth 20% Job Growth 20% 2007 Jobs 10% TOD Housing 10% TOD Jobs	45% HH Growth 22.5% Job Growth 22.5% 2007 Jobs 5% TOD Housing 5% TOD Jobs	40% HH Growth 20% Job Growth 20% 2007 Jobs 10% TOD Housing 10% TOD Jobs	50% HH Growth 25% existing Jobs 25% Job Growth
ALAMEDA	2,075	2,177	2,114	2,241
ALBANY	262	295	262	328
BERKELEY	2,714	2,691	2,802	2,580
DUBLIN	3,440	3,656	3,488	3,824
EMERYVILLE	1,537	1,431	1,614	1,247
FREMONT	4,827	4,668	4,578	4,759
HAYWARD	3,348	3,541	3,409	3,672
LIVERMORE	3,423	3,655	3,473	3,837
NEWARK	898	967	909	1,026
OAKLAND	17,099	15,873	17,933	13,813
PIEDMONT	37	42	37	47
PLEASANTON	3,688	3,712	3,785	3,639
SAN LEANDRO	1,874	1,835	1,942	1,729
UNION CITY	2,011	2,078	2,056	2,099
UNINCORPORATED	2,240	2,361	2,281	2,441
ALAMEDA COUNTY	49,474	48,983	50,684	47,283
ANTIOCH	2,302	2,440	2,169	2,711
BRENTWOOD	2,807	2,892	2,571	3,213
CLAYTON	145	163	145	181
CONCORD	3,120	3,281	3,179	3,383
DANVILLE	554	623	554	692
EL CERRITO	522	463	554	373
HERCULES	431	485	431	539
LAFAYETTE	358	378	364	392
MARTINEZ	1,046	1,140	1,055	1,226
MORAGA	223	250	223	278
OAKLEY	749	828	736	921
ORINDA	221	232	225	240
PINOLE	306	345	306	383
PITTSBURG	2,022	1,893	1,777	2,009
PLEASANT HILL	592	666	592	740
RICHMOND	2,761	3,000	2,788	3,212
SAN PABLO	283	318	283	353
SAN RAMON	3,292	3,703	3,292	4,115
WALNUT CREEK	2,208	2,229	2,271	2,186
UNINCORPORATED	3,662	3,689	3,377	4,001
CONTRA COSTA COUNT	07.004	29,020	26,890	31,150
	25	28	25	31
BELVEDERE	25 232	261	232	290
CORTE MADERA	232	201	202	200

8 - E - 8 R

*....* 

		1	2	3
0	Draft	Existing TOD		
	Allocation	Less TOD	Existing TOD	No TOD
a.	40% HH Growth 20% Job Growth 20% 2007 Jobs 10% TOD Housing 10% TOD Jobs	45% HH Growth 22.5% Job Growth 22.5% 2007 Jobs 5% TOD Housing 5% TOD Jobs	40% HH Growth 20% Job Growth 20% 2007 Jobs 10% TOD Housing 10% TOD Jobs	50% HH Growth 25% existing Jobs 25% Job Growth
FAIRFAX	72	81	72	90
LARKSPUR	612	515	576	454
MILL VALLEY	278	312	278	347
NOVATO	1,431	1,327	1,180	1,475
ROSS	25	28	25	32
SAN ANSELMO	108	121	108	135
SAN RAFAEL	1,559	1,493	1,327	1,658
SAUSALITO	178	190	180	200
TIBURON	123	131	125	136
UNINCORPORATED	683	761	677	846
MARIN COUNTY	5,325	5,248	4,803	5,693
AMERICAN CANYON	692	779	692	866
CALISTOGA	90	101	90	112
NAPA	1,917	2,156	1,917	2,396
ST HELENA	116	130	116	145
YOUNTVILLE	84	94	84	105
UNINCORPORATED	625	704	625	782
NAPA COUNTY	3,524	3,964	3,524	4,404
SAN FRANCISCO COUNT	40,494	35,365	42,836	27,894
SAN MATEO COUNTY	18,270	18,270	18,270	18,270
CAMPBELL	740	832	740	925
CUPERTINO	1,112	1,251	1,112	1,390
GILROY	1,585	1,716	1,602	1,830
LOS ALTOS	302	339	302	377
LOS ALTOS HILLS	77	87	77	96
LOS GATOS	533	600	533	667
MILPITAS	2,621	2,570	2,406	2,734
MONTE SERENO	40	44	40	49
MORGAN HILL	1,329	1,402	1,350	1,455
MOUNTAIN VIEW	2,754	2,915	2,802	3,029
PALO ALTO	3,716	3,790	3,813	3,766
SAN JOSE	33,259	34,906	32,610	37,203
SANTA CLARA	5,974	5,816	5,662	5,969
SARATOGA	277	312	277	347
SUNNYVALE	4,584	4,725	4,686	4,764
UNINCORPORATED	160	169	163	175
SANTA CLARA COUNTY	59,062	61,474	58,174	64,774
				1

Ċ.

	Draft Allocation	1 Existing TOD Less TOD	2 Existing TOD	3 No TOD
	40% HH Growth 20% Job Growth 20% 2007 Jobs 10% TOD Housing 10% TOD Jobs	45% HH Growth 22.5% Job Growth 22.5% 2007 Jobs 5% TOD Housing 5% TOD Jobs	40% HH Growth 20% Job Growth 20% 2007 Jobs 10% TOD Housing 10% TOD Jobs	50% Hil Growth 25% existing Jobs 25% Job Growth
BENICIA	505	569	505	632
DIXON	692	779	692	865
FAIRFIELD	3,665	4,065	3,679	4,451
RIO VISTA	1,159	1,304	1,159	1,448
SUISUN CITY	596	636	605	666
VACAVILLE	2,758	3,102	2,758	3,447
VALLEJO	3,094	3,312	3,139	3,484
UNINCORPORATED	94	105	. 94	117
SOLANO COUNTY	12,562	13,871	12,631	15,111
CLOVERDALE	505	445	396	495
COTATI	378	275	244	306
HEALDSBURG	396	354	315	394
PETALUMA	2,059	2,064	1,835	2,293
ROHNERT PARK	1,897	1,661	1,477	1,846
SANTA ROSA	6,673	6,986	6,210	7,763
SEBASTOPOL	168	189	168	210
SONOMA	336	377	336	419
WINDSOR	699	710	631	788
UNINCORPORATED	1,320	1,485	1,320	1,650
SONOMA COUNTY	14,430	14,547	12,931	16,163
REGION	230,743	230,743	230,743	230,743

. . .

\*



METROPOLITAN TRANSPORTATION COMMISSION Joseph P. Bort MetroCenter 101 Eighth Street Oakland, CA 94607-4700 TEL 510.817.5700 TDD/TTY 510.817.5769 FAX 510.817.5848 E-MAIL info@intc.ca.gov WEB www.mtc.ca.gov

#### Memorandum

TO: Regional Targets Advisory Committee

FR: Steve Heminger

DATE: May 17, 2010

W. I.

#### RE: Senate Bill 375 Implementation: GHG Target-setting - Scenario Testing

#### INTRODUCTION

MTC has traditionally evaluated several scenario assessments as part of its RTP process. The evaluations typically range from constrained project, land use and pricing assumptions to totally unconstrained and admittedly unachievable alternatives. The purpose of these diverse scenarios have been to test a broad range of options and what there impacts are on various measures, including GHG emissions (our RTPs have been measuring GHG emissions since the early 1990s).

#### **2009 RTP EVALUATION**

#### Background

MTC adopted its 2009 RTP, known as Transportation 2035 (or T2035), in April 2009. T2035 did not deviate from this past practice of looking at a very broad range of constrained/unconstrained transportation, land use and pricing scenarios.

The T2035 process took a two step scenario evaluation approach. First, our "Vision Analyses" evaluated financially unconstrained investment packages – HOV/Express Bus, Freeway Operations and Rail/Ferry; the second round, conducted as part of our RTP EIR process, looked at several financially constrained options. Our analyses consistently have found that infrastructure by itself does not do much for reducing GHG emissions. What makes more of a difference is when these infrastructure improvements can be combined with options that price the private automobile and provide more dense and mixed use land use patterns in urban areas that are well served by transit and are conducive to walking and biking. This was true for both our Vision and RTP EIR analyses for T2035.

Our RTP EIR evaluation provided the basis for the range of scenarios that have been included in the MPO submittal to RTAC and CARB. Because we consistently found that infrastructure has little impact on emissions, the analyses focused mainly pricing and land use options and combinations of the two. In addition, in the financially constrained environment of the RTP, our agency has consistently prioritized a "fix it first" credo, to the extent that nearly 80% of all RTP expenditures are for maintaining and operating our existing transportation system; most of the rest of the expenditures are on transit expansion, with a smaller amount to road expansion. This heavy maintenance is attributed to the overall age of the transportation system that was mostly built 50 – 60 years ago – in addition, there is limited right of way available to expand transit or highway system – as a result, our more recent focus has been to squeeze more capacity out of the existing system through ramp metering, BRT and other operational improvements

#### Alternatives Tested

Given that our T2035 plan invests more than 80% of revenues into maintaining and operating or existing transportation system, there was very little variation in the transportation networks among our scenarios; most of the variation was in land use and pricing assumptions. In summary, the scenarios are defined as follows:

**Project**: The proposed Transportation 2035 Plan is financially constrained, as defined in the past four plans, and consistent with federal planning regulations. A total of \$226 billion in projected revenue is estimated to be available under the proposed Transportation 2035 Plan.

Key new projects include: buildout of our HOV lane system and conversion to Express (HOT) lanes; completion of several transit expansion projects, including BART/San Jose/Santa Clara extension, SF MTA's Central Subway to China town, BART extension to Eastern Contra Costa County; new Marin/Sonoma County rail system, ferry expansion; regionwide ramp metering; and completion of our Regional Bicycle Network

Heavy Maintenance/Climate Change Emphasis: This alternative maximizes the use of available discretionary funds for investments that (1) reduce shortfalls for transit and local roadway maintenance; (2) improve walkability, bicycling, transit access, and carpooling and ridesharing; (3) help local jurisdictions to plan and build housing near transit; and (4) implement public education and outreach programs to raise awareness and facilitate behavior changes that help the region to meet its climate protection goal. It excludes the Express Lane and transit expansion projects mentioned above in the Project alternative.

Add Land Use and Pricing Assumptions: Applies one or both of the land use and pricing assumptions to the Heavy Maintenance and Project Alternatives. Our pricing and land use scenarios include very aggressive assumptions. We increase auto operating costs nearly 5 fold – this is necessary to move the GHG emissions "needle" because the Bay Area is a relatively high-wealth region. Our land use assumptions including moving 200,000 people, over and above current projections, in 2035 to San Francisco to better match jobs with workers; alternatively, we remove a like number of people in several suburban counties that have much higher jobs/housing imbalances.

Needless to say, these pricing and land use assumptions are not considered attainable by any stretch of the imagination. Given that MTC has little control over what it can price and even less control over local land use decisions, a more likely scenario would be to provide incentives to local agencies that do implement innovative pricing strategies or take on larger shares of housing and population.

#### Alternative Assessment Results

The RTP EIR alternatives produced a range of GHG emission results as follows:

Alts/GHG emissions reductions from 2005 (% per capita)	Project	Heavy Maint.	Project + Land use	Heavy Maint + Land Use	Project + Pricing	Heavy Maint + Pricing	Project + Land use + Pricing	Heavy Maint + Land use + Pricing
2020	-5%	-3%	-7%	-5%	-7%	-5%	-10%	-7%
2035	-3%	-1%	-10%	-8%	-10%	-8%	-12	-9%

As shown from the above table, there are several observations regarding GHG emissions compared to 2005 base year:

- 1. The Project performs better than the Heavy Maintenance alternative. This makes sense since most of the T2035 system expansion investments are for transit improvements; even highway expansion, which is only 4% of total RTP funding, is for expanding HOV/Express lanes, which have been shown encourage more carpooling and improve transit transit performance.
- 2. Our pricing and land use options perform about the same. Combined land use and pricing scenarios perform better than one or the other; while the two scenarios are synergistic, they are not additive.
- 3. Project assessments that we have tested in 2035 range from -3% weekday pounds per capita GHG emission reductions (2035 RTP) to -12% per capita reductions.

#### SUMMARY

Given that our maintenance and operations RTP financially constrained expenditures have and will likely continue in the 80% range, the region will likely not be able to depend on massive infrastructure improvements to support GHG emission reductions. We can expect some modest reductions as a result of strategic expansion through priced Express Lanes and select transit corridors and operational improvements that squeeze more capacity out of our existing transportation system.

Most of the GHG reductions that can be realized will result from how successful the region can be in moving toward more dense/mixed use and transit oriented development, and implementing more creative ways price the transportation system to adequately reflect the true costs of a limited resource. To these ends, we have been incentivizing local agencies over the past several years to do these things through our Transportation for Livable Communities (TLC – which offers planning assistance and capital grants for TOD totaling about \$30 million per year) program, our Blueprint program (known as Focus, which in cooperation with local agencies, identified about 120 Priority Development Areas, or PDAs, where we will focus all of our TLC funds), and various other regional programs, including our Regional Bike Network (about \$20 million/yr) and Climate Change Initiative Program (about \$40 million/yr.

However, it's difficult to measure the impacts of these programs. Given what we know today, we can achieve a 5% GHG reduction per capita in 2020 and 5% in 2035 – those are based on our adopted plan. While SB 375 does allow each MPO to submit a target for CARB to consider, for now we will continue to work closely with the other MPOs and provide CARB with as consistent and complete data as we can. This data will allow CARB to set a target that is both ambitious and achievable.



# Application Guidelines for Priority Development Area Designation

FOCUS is a regional, incentive-based development and conservation strategy for the San Francisco Bay Area. FOCUS is led by the Association of Bay Area Governments and the Metropolitan Transportation Commission in coordination with the Bay Area Air Quality Management District and the Bay Conservation and Development Commission. It is partially funded by a regional blueprint planning grant from the State of California Business, Transportation, and Housing Agency.

FOCUS is a partnership of four regional agencies. www.bayareavision.org + FOCUS@abag.ca.gov + 510-464-7993



#### I. FOCUS Overview

FOCUS is a regional incentive-based development and conservation strategy for the San Francisco Bay Area. Regional agencies address climate change, transportation, housing, the economy, and other issues that transcend city boundaries but impact all members of the region. FOCUS unites the efforts of four regional agencies into a single program that encourages future population growth in areas near transit and within the communities that surround the San Francisco Bay. Concentrating housing in these areas offers housing and transportation choices for all residents, while helping to reduce traffic, protect the environment, and enhance existing neighborhoods. FOCUS also guides conservation efforts towards the region's most important natural resources.

FOCUS is led by the Association of Bay Area Governments (ABAG) and the Metropolitan Transportation Commission (MTC), with support from the Bay Area Air Quality Management District (BAAQMD) and the Bay Conservation and Development Commission (BCDC)—in partnership with congestion management agencies, transit providers and local governments throughout the Bay Area. It is partially funded by a Blueprint Grant from the State of California Business, Transportation, and Housing Agency.

Applications are accepted on a rolling basis for Priority Development Area designation. Priority Development Areas support focused growth by accommodating growth as mixed use, infill development near transit and job centers, with an emphasis on housing. Local governments who meet the application criteria are invited to submit an application for an area within their jurisdiction. Participation in this designation process is voluntary. Applications received are reviewed on a quarterly basis.

The designation of Priority Development Areas informs regional agencies where incentives and assistance are needed to support local efforts in creating complete communities. Regional agencies have developed programs for technical assistance, planning grants, and capital infrastructure funding for which these areas are eligible to apply. This designation helps connect those jurisdictions with funding opportunities, but many of the funding programs are still highly competitive. Those jurisdictions with Priority Development Area goals closely aligned with program criteria can be more successful than other areas. Over 100 Priority Development Areas have been adopted by the ABAG Executive Board. To learn more about the FOCUS Initiative and adopted Priority Development Areas, visit the Focused Growth website at www.bayarcavision.org.

#### II. Eligibility for Applicants and Areas

Any town, city, or county government within the nine county San Francisco Bay Area can apply as the lead applicant for priority area designation. Multiple jurisdictions can submit a joint application for an area. As part of the application, the lead applicant will need to provide a copy of a resolution adopted by the town/city council or board of supervisors showing support for involvement in the FOCUS process. Private and other public entities cannot be lead applicants but can partner with or show support for the lead applicant. In the case of a multiple jurisdiction application for designation of an area, a transit agency or county congestion management agency may be the lead applicant. The lead transit agency or congestion management agency will need to contact regional agency staff for approval, and a resolution from each participating jurisdiction will still be required as part of the application.

Applicants must demonstrate that an area proposed for designation as a priority development area meets all of the following criteria:

- The area is within an existing community.
- The area is near existing or planned fixed transit (or served by comparable bus service).
- The area is planned or is planning for more housing.

In September 2011, place type criteria for PDAs were added for Rural Town Centers, Rural Mixed Use Corridors, and Employment Centers to make the place type menu available to PDAs more inclusive of opportunities in these areas to advance sustainability. The criteria for each of these Place Types follow:

#### Rural Town Center/Rural Corridor

The rural place types acknowledge the contribution that rural areas provide on a local and regional scale. Locally they serve as centers for residents, businesses, and commuters to access services needed in the area. Regionally, these centers and corridors may also serve as gateways to tourist destinations focused on the bounty of agricultural lands or recreational areas. Rural Town Centers have focused development around a central part of the town, whereas Rural Corridors have focused development along a main street through the area.

- The areas are existing town centers (not co-terminus with other urban communities) and/or are a along a corridor through a rural area
- The areas encompass or are being planned to include a mix of services to reduce vehicle miles traveled and/or are being planned for more housing with a mix of supportive services
- The areas are being planned for more connectivity (multi-modal improvements, transit for employees and residents, etc.) and increased opportunities for walking and biking.
- Areas have an urban growth boundary or other zoning policy in place, such as an urban service area, to limit sprawling development

#### Employment Center

Acknowledging the importance of employment location in creating a robust, functional transit network and sustainable regional land use pattern, the Employment Center place type designation is intended for existing non-residential areas with transit service that are planning for more intensive development, including a greater mix of uses and more pedestrian-friendly, vibrant environments. These might include central business districts, redeveloping office parks, or retrofitting commercial corridors or shopping malls.

- The areas currently contain a density of 25 jobs per gross acre or greater than 0.5 FAR or have the plan capacity for this intensity of jobs
- The areas are currently served by transit or have planned transit service (existing or planned fixed rail, demonstrated high frequency bus with 20 min headways during peak weekday commute hours, or shuttle service to fixed rail) and support other modes of transportation (required Transportation Demand Management, improved walking and biking, and reduced parking requirements)
- The areas are planned for a mix of uses, services, and amenities for employees
- The jurisdiction is providing sufficient housing near the employment center to merit resources supporting an exclusively employment development area. The jurisdiction has lower existing jobs per household than the regional average of 1.25 or the jurisdiction has lower future jobs per household in its adopted General Plan than its existing ratio.

Jurisdictions submitting a PDA application will either select a place type from the Station Area Planning Manual<sup>1</sup> or select one of the above place types.

<sup>&</sup>lt;sup>1</sup> Station Area Planning Manual:

http://www.mtc.ca.gov/planning/smart growth/stations/Station\_Area\_Planning\_Manual\_Nov07.pdf

#### III. Designation Criteria Definitions

The following definitions are intended to clarify the designation criteria.

<u>Area</u> - means the planning area being proposed for designation as a priority development area under the FOCUS program. Since the program seeks to support area planning, the recommended area size is 100 acres, which is approximately a <sup>1</sup>/<sub>4</sub> mile radius.

- A *planned area* is part of an existing plan that is more specific than a general plan, such as a specific plan or an area plan.
- A *potential area* may be envisioned as a potential planning area that is not currently identified in a plan or may be part of an existing plan that needs changes.

<u>Existing Community</u> – means that the area is within an existing urbanized area, lies within an urban growth boundary or limit line if one is established, and has existing or planned infrastructure to support development that will provide or connect to a range of services and amenities that meet the daily needs of residents making non motorized modes of transportation an option.

<u>Housing</u> – means the area has plans for a significant increase in housing units to a minimum density of the selected place type from the Station Area Planning Manual, including affordable units, which can also be a part of a mixed use development that provides other daily services, maximizes alternative modes of travel, and makes appropriate land use connections.

<u>Near Transit</u> – means (1) the area around an existing rail station or ferry terminal (typically a half-mile around the station), (2) the area served by a bus or bus rapid transit corridor with minimum headways of 20 minutes during peak weekday commute periods, or (3) the area defined as a planned transit station by MTC's Resolution 3434.

#### IV. Application Review Process

Applications received will be reviewed on a quarterly basis. The quarters for the year include: January to March, April to June, July to September, and October to December. Applications received within a quarter will be reviewed at the start of a new quarter. For instance, the review process for an application received in February will begin in April.

#### Applying to Become a PDA

For new PDAs, the application review process involves the following steps:

- 1. Upon receipt, applications will be checked for completeness and eligibility.
- 2. FOCUS staff will recommend designation of eligible areas as a Planned or Potential Priority Development Area based on the planning status for the area's development vision and submission of the supporting local government resolution. To qualify for Planned PDA Status, the plan for the area should:
  - a. Include a map designating the land uses for the plan area
  - b. Identify densities/development intensities for plan land uses
  - c. Include implementing actions/an implementation plan
- 3. If staff recommends designation as a Planned PDA, the applicant will be asked to complete a PDA Assessment Survey, to provide more detailed information about the priority area.
- 4. Staff recommendations will be presented to ABAG's Regional Planning Committee (RPC) for approval and then to ABAG's Executive Board for regional adoption.

#### Changing the Status of an Existing PDA

To change the status of a PDA from Potential to Planned, contact the FOCUS Staff person for your jurisdiction. He or she will review the adopted plan to ensure that it:

#### FOCUS Application Guidelines for Priority Development Area Designation

- 1. Includes a map designating the land uses for the plan area
- 2. Identifies densities/development intensities for plan land uses
- 3. Includes implementing actions/an implementation plan

Applicants for a status change will be asked to complete a PDA Assessment Survey. Upon review of the plan and the completed PDA Assessment Survey, FOCUS Staff will submit the revision request to the ABAG Planning Director for approval. This revision does not need to be approved by the RPC or Executive Board.

#### **Revisions to an Existing PDA**

1 1

To revise an existing PDA, contact the FOCUS Staff person for your jurisdiction. The applicant will be asked to submit an updated application (map, narrative, jobs and housing numbers, etc.) to provide accurate and up-to-date information about the revised area.

If the revision is to a Potential PDA, then the applicant should submit an updated infrastructure budget. If the revision is to a Planned PDA, then the applicant should submit an updated PDA Assessment Survey. A new resolution is not required.

Requests to revise an existing PDA will be reviewed by the FOCUS Staff for your jurisdiction, who will assess whether the revised PDA will:

- 1. Result in a recognizable "neighborhood," as identified by the local jurisdiction or planning done to date
- 2. Remain consistent with the PDA eligibility criteria

After review by FOCUS Staff, the revision request will be submitted to the ABAG Planning Director for approval. This change does not need to be approved by the RPC or Executive Board.

#### V. Application Form and Submission Instructions

The following are the basic steps in accessing and submitting an application:

- 1. Download an electronic version of the application (Application for Priority Development Area Designation) from the FOCUS website: <u>www.bayareavision.org</u>
- 2. After reviewing the application requirements, contact the ABAG Regional Planner for your jurisdiction and discuss the goals for the proposed area. These contacts are listed on the FOCUS website at <a href="http://www.bayareavision.org/initiatives/contacts.html">http://www.bayareavision.org/initiatives/contacts.html</a>.
- 3. Fill out an application and compile the documents requested in the application form for **each** area. A sample local government resolution, Excel files for entering information about infrastructure needs and funding sources, and the Station Area Planning Manual are also available on the FOCUS website.
- 4. Submit an electronic version of the application form and associated documents requested in the application for each area to <u>FOCUS@abag.ca.gov</u>.
- 5. Mail one hard copy of the application and attachments for each area to the Association of Bay Area Governments, Attn: Jackie Reinhart, P.O. Box 2050, Oakland, CA 94604-2050.

#### VI. Contact Information

For questions regarding the application, please contact Jackie Reinhart, ABAG Regional Planner, at <u>JackieR@abag.ca.gov</u> or 510-464-7994.

#### ASSOCIATION OF BAY AREA GOVERNMENTS Representing City and County Governments of the San Francisco Bay Area

#### MEMO

To:ABAG Executive BoardFrom:Ken Kirkey, ABAG Director of Planning and ResearchDate:May 17, 2012Subject:Regional Housing Need Allocation (RHNA) Methodology (2014-2022)

#### I. Recommendation

Staff recommends that the ABAG Executive Board approve the DRAFT Regional Housing Need Allocation (RHNA) Methodology and the preliminary Subregional Shares for the fifth cycle: 2014-2022. Since January 2011, ABAG and MTC have been working with members of the Housing Methodology Committee (HMC) to develop the specific RHNA methodology for the Bay Area Discussions have focused on how best to promote consistency between RHNA and the proposed Sustainable Communities Strategy. The RHNA methodology described in this memo has been supported by the HMC.

#### II. Background and Present Legislation

The State of California, since 1980 has required each town, city, and unincorporated area to plar for its share of the state's housing need for people of all income levels. This requirement is the Housing Element Law (Chapter 1143, Statutes of 1980; AB 2853) that created the Regional Housing Need Allocation. The statutory objective regarding RHNA requires that two major steps be completed before a city receives its RHNA allocation. First, the California Department of Housing and Community Development (HCD) determine Regional Housing Need Determination (RHND) or total housing need for the state and each region. The total determination is then divided into shares defined by income categories. Each category is defined by the Health and Safety Code (Section 50093, et seq.) Second, the designated regional agencies then distribute this need to local governments. As the Council of Governments for the San Francisco Bay Area, ABAG is this designated regional agency. This allocation process is based on eight-year zoning capacity and does not consider local government constraints.

In addition to AB 2853, the adoption of Senate Bill 375 (Chapter, Statutes of 2008) amends the RHNA schedule. SB 375 aims to integrate land use and transportation planning to reduce transportation-related GHG emissions. The bill requires that all Regional Transportation Plans (RTPs) incorporate a Sustainable Communities Strategy that guides growth into locations that promote alternatives to automobile travel. In the Bay Area, the Jobs-Housing Connection Strategy accommodates the Bay Area's Regional Housing Need Allocation. Through this process, the region's housing, transportation, and land use planning are aligned. To ensure that the SCS has fully accommodated RHNA, ABAG allocates the pre-determined regional housing need from HCD to local jurisdictions, consistent with the land use criteria specified in the Jobs-Housing Connection Strategy. This land use plan has identified a network of neighborhoods that can accommodate housing over 30 years (see the Jobs-Housing Connection Strategy report, May 2012).

# DRAFT REGIONAL HOUSING NEED ALLOCATION

Updated on May 10, 2012 - For ABAG Executive Board Review

		Draft 2014-2022 RHNA						1999-
		Very Low 0-50%	Løw 51-80%	Moderate \$1-120%	Above Moderate 120%+	Total	2014 RHNA Totai	2006 RHNA Total
	Alameda County							
	Alameda	473	268	290	669	1,701	2,046	2,162
	Alameda Albany	86	58	60	132	335	276	277
	Berkeley	581	445	578	1,276	2,881	2,431	1,269
	Dublin	783	454	442	498	2,177	3,330	5,436
C	Emeryville	291	224	236	671	1,421	1,137	777
	Fremont	1,632	897	945	1,466	4,940	4,380	6,708
~	Hayward	960	538	632	1,876	4,006	3,393	2,835
е р	Livermore	861	493	518	796	2,669	3,394	5,107
	Newark	371	197	186	395	1,149	863	1,250
6	Oakland	2,523	2,237	2,958	7,658	15,376	14,629	7,733
4	Piedmont	24	14	15	7	60	40	49
	Pleasanton	685	387	393	446	1,912	3,277	5,059
e,	San Leandro	542	281	349	1,023	2,194	1,630	870
	Union City	334	193	202	371	1,099	1,944	1,951
	Alameda County Unincorporated	440	229	278	699	1,646	2,167	5,310
		10,584	6,916	8,082	17 <b>,983</b>	43,567	44,937	46,793
	Contra Conta Consta							
	Contra Costa County	338	199	209	679	1,425	2,282	4,459
	Antioch	231	199	121	283	755	2,705	4,073
	Brentwood	50	25	31	34	140	151	446
	Clayton	50 770	433	554	1,672	3,428	3,043	2,319
	Concord	194	433	124	126	554	583	1,110
	Danville	194 94	60	66	160	378	431	185
	El Cerrito	217	114	99	249	680	453	792
	Hercules	125	71	78	92	366	361	194
	Lafayette	123	71	78	196	466	1,060	1,341
	Martinez	68	39	46	57	210	234	214
	Moraga	311	171	171	509	1,163	775	1,208
	Oakley Orinda	84	47	53	41	225	218	221
	Pinole	77	46	39	125	287	323	288
	Pittsburg	367	244	305	1,040	1,955	1,772	2,513
	Pleasant Hill	115	68	84	178	445	628	714
	Richmond	417	302	400	1,272	2,391	2,826	2,603
	San Pablo	52	53	75	267	447	298	494
	San Ramon	465	251	252	314	1,283	3,463	4,447
	Walnut Creek	594	348	378	906	2,226	1,958	1,653
	Contra Costa County Unincorporated	349	205	229	511	1,295	3,508	5,436
	country operation operation	5,039	2,978	3,390	8,711	20,118	27,072	34,710

Note: This draft 2014-2022 RHNA by income category for each jurisdiction is based on the Jobs-Housing Connection Strategy, May 11, 2012. Totals may not add up due to rounding.

## DRAFT REGIONAL HOUSING NEED ALLOCATION

Updated on May 10, 2012 - For ABAG Executive Board Review

		Draft 2014-2022 RHNA					1999-
	Very Low 0-50%	Lów 51-80%	Moderate 81-120%	Above Moderate 120%+	Total	2014 RHNA Total	2006 RHNA Total
Marin County							
Beivedere	4	3	4	5	16	17	10
Corte Madera	20	11	12	27	70	244	179
Fairfax	15	9	11	25	61	108	64
Larkspur	36	17	20	58	131	382	303
Mill Valley	38	23	24	43	129	292	225
e Novato	99	60	68	187	413	1,241	2,582
Ross	6	3	4	4	18	27	21
San Anselmo	30	15	18	42	106	113	149
San Rafael	210	144	181	494	1,029	1,403	2,090
Sausalito	25	14	15	29	82	165	207
Tiburon	23	16	18	21	78	117	164
Marin County Unincorporated	51	31	37	69	187	773	521
	557	346	414	1,004	2,320	4,882	6,515
Napa County							
American Canyon	125	60	62	146	394	728	1,323
Calistoga	7	2	4	14	27	94	173
Napa	215	117	152	383	866	2,024	3,369
St. Helena	8	5	5	12	31	121	142
Yountville	5	2	3	7	17	87	87
Napa County Unincorporated	57	34	35	62	189	651	1,969
	417	221	261	625	1,524	3,705	7,063
San Francisco County							
San Francisco	6,499	4,718	5,452	11,350	28,019	31,193	20,372
	6,499	4,718	5,452	11,350	28,019	31,193	20,372

Note: This draft 2014-2022 RHNA by income category for each jurisdiction is based on the Jobs-Housing Connection Strategy, May 11, 2012. Totals may not add up due to rounding.

### DRAFT REGIONAL HOUSING NEED ALLOCATION

Updated on May 10, 2012 - For ABAG Executive Board Review

		Draft 2014-2022 RHNA					1999-
	Very Low 0-50%	Low 51-80%	Noderate 81-120%	Above Moderate 120%+	Total	2014 RHNA Total	2006 RHNA Total
San Mateo County							
Atherton	36	26	28	15	105	83	166
Belmont	110	58	66	133	366	399	317
Brisbane	20	11	13	28	72	401	426
Burlingame	261	137	151	427	<b>9</b> 75	650	565
Colma	19	8	9	34	69	65	74
Daly City	369	174	219	743	1,505	1,207	1,391
East Palo Alto	50	51	88	277	466	630	1,282
Foster City	144	81	65	139	429	486	690
Half Moon Bay	48	31	32	74	185	276	458
Hillsborough	49	28	34	18	129	86	84
Menio Park	214	128	124	236	701	993	982
Millbrae	178	94	107	299	678	452	343
Pacifica	114	61	68	169	413	275	666
Portola Valley	21	14	14	16	64	74	82
Redwood City	646	405	490	1,243	2,784	1,856	2,544
San Bruno	304	142	188	558	1,193	973	378
San Carlos	166	89	94	180	529	599	368
San Mateo	770	420	498	1,237	2,925	3,051	2,437
South San Francisco	511	240	311	965	2,027	1,635	1,331
Woodside	22	13	15	12	62	41	41
San Mateo County Unincorporated	85	54	63	104	306	1,506	1,680
	4,135	2,267	2,676	6,906	15,984	15,738	16,305
Santa Clara County							
Campbell	224	121	142	420	906	892	777
Cupertino	432	261	275	391	1,358	1,170	2,720
Gilroy	204	157	215	505	1,081	1,615	3,746
Los Altos	162	98	107	108	476	317	261
Los Altos Hills	45	28	31	18	122	81	83
Los Gatos	189	107	131	190	616	562	402
Milpitas	920	497	513	1,255	3,186	2,487	4,348
Monte Sereno	23	12	13	14	62	41	76
Morgan Hill	235	139	168	324	865	1,312	2,484
Mountain View	712	425	480	1,136	2,754	2,599	3,423
Palo Aito	65 <del>9</del>	420	457	657	2,192	2,860	1,397
San Jose	8,881	5,356	6,337	16,532	37,106	34,721	26,114
Santa Clara	902	608	663	1,640	3,812	5,873	6,339
Saratoga	143	91	102	102	438	292	539
Sunnyvale	1,540	871	870	2,293	5,574	4,426	3,836
Santa Clara County Unincorporated	15	9	11	24	58	1,090	1,446
	1 <b>5,284</b>	9,200	1 <b>0,513</b>	25,610	60,607	60,338	57,991

Note: This draft 2014-2022 RHNA by income category for each jurisdiction is based on the Jobs-Housing Connection Strategy, May 11, 2012. Totals may not add up due to rounding.



#### **Development Feasibility**

One of the central challenges of a regional smart growth strategy is creating new development patterns that can be feasibly developed by the private sector. The concept of development feasibility has several dimensions, including the marketability of compact housing products, physical "fit" within available land supply, and the generation of sufficient financial returns to stimulate private investment. This paper analyzes development feasibility across these dimensions for each Alternative compared to the 2020 Base Case.

#### **Overall Mix of Unit Types by 2020**

In 1990, approximately 60 percent of the Bay Area's total housing stock was built as single family units. However, during the 1990s, approximately 66 percent of the new units built were single family, changing the overall mix of built housing stock in the region by 2000 to 62 percent single family. This trend varied substantially by county; for example, 84 percent of Solaro County's new units built in the 1990s were single family, compared to 50 percent of Santa Clara County's and just 10 percent of San Francisco's new units.

ABAG's 2020 Base Case forecasts that 67 percent of total units to be added to the region's housing stock between 2000 and 2020 will be single family, resulting in an overall housing stock of 63 percent single family units by 2020, a slight <u>increase</u> in the proportion of singe family homes compared to 2000.

All of the Alternatives envision a shift in the single/multifamily construction pattern over the next 20 years, to varying degrees. Alternative 1 envisions that only 26 percent of new housing units would be single family, Alternative 2 envisions 39 percent single family, and Alternative 3 envisions 50 percent single family. The addition of these new units in these proportions would slightly alter the overall regional housing stock mix by 2020 to 54 percent single family in Alternative 1, 57 percent in Alternative 2, and 59 percent in Alternative 3. Single family homes would still be the predominant unit type under all three alternatives throughout the region, but in slightly lower proportions than exist today or under the Base Case.

#### Change in Unit Mix 20002 to 2020

	Base Case		Alternative 1		Alternative 2		Alternative 3	
	SF	MF	SF	MF	SF	MF	SF	MF
Increase 2000-2020	67%	33%	26%	74%	39%	61%	50%	50%
Total Units in 2020	63%	37%	54%	46%	57%	43%	59%	41%

Source: ABAG Projections 2000, BAE, 2002 based on Round 1 Alternatives.

Headquarters 2560 Ninth Street, Suite 211 Berkeley, CA, 94710 1



#### Marketability

The most substantial change envisioned by the Alternatives is the shift away from single family homes to more compact housing products, along with place types that mix housing with other uses. Many developers and elected officials question if demand for housing from Bay Area households would support these shifts in unit types. There is a strong belief that households prefer the traditional "American Dream" of a single family detached home. For example, the Home Builders Association (HBA) of Northern California commissioned a study of subdivision shoppers regarding unit type preferences<sup>1</sup>. Of the 223 responses, approximately 43 percent were "mainly considering a single family home," while 26 percent said they were "considering single and multifamily products equally," and another 28 percent fell between these two statements on an opinion scale. At the same time, 61 percent expressed a willingness to drive up to 20 miles further if housing were more affordable (which the HBA study interpreted as explaining the interest in distant, less expensive single family units such as those found outside the region in San Joaquin County and other locations).

However, in the same HBA-commissioned survey, when subdivision shoppers were asked about their interest in housing near their workplace, 42 percent indicated that they would be willing to pay "less or equal" for "higher density, attached housing near" their jobs. This same interest in minimizing commute distances in exchange for accepting more compact housing types has been found in more localized studies conducted for downtown Oakland and downtown South San Francisco<sup>2</sup>, where employees in nearby office centers strongly confirmed this type of demand, particularly among market segments such as young single households and empty nesters.

On a national level, community preferences have also been explored by studies seeking to define acceptance of New Urbanist design principles, which include smaller lots and more compact development types. One study of 2,000 buyers of both newly constructed and resale homes noted "Often what buyers want is NOT what they get. One of the main reasons behind this is that they couldn't find what they wanted in their markets.<sup>3</sup>" This study found that homebuyers wanted less sprawl and more "small town" pedestrian-oriented shopping and gathering places, while at the same time were concerned about privacy and noise, and disliked the notion of narrower streets. This conundrum regarding seemingly conflicting buyer preferences has been addressed through innovative New Urbanist community design, with several studies indicating that buyers will pay a premium for communities that successfully resolve the conflicting goals of compact development, desire for privacy, and creation of "place."

#### Headquarters

2560 Ninth Street, Suite 211 Berkeley, CA, 94710

<sup>&</sup>lt;sup>1</sup> HBA News, June 2000. Note that the findings from this survey may have been skewed by the origin of the survey sample, taken from people shopping for housing in single family subdivisions.

<sup>&</sup>lt;sup>2</sup> Old Town Square Market Feasibility Study (BAE 1997), and Demand for Downtown Housing in South San Francisco (BAE, 2000).

<sup>&</sup>lt;sup>3</sup> Community Preferences: What the Buyers Really Want in Design, Features, and Amenities (American LIVES, Inc., 1999).

<sup>&</sup>lt;sup>\*</sup> Valuing The New Urbanism (Urban Land Institute, 1999)



Another view of the future is that more buyers and renters are rediscovering the attraction of urban living, whether to minimize commute distances or experience the cultural richness of established urban places. Immigrant population increases are also contributing to this urban trend. In 1998, the Brookings Institute found a "back to the city" trend occurring within cities' downtowns<sup>5</sup>, and subsequent analysis by the U.S. Census found that of the 20 largest cities in the U.S., 16 gained population between 1990 and 2000<sup>6</sup>, reversing trends of population loss in earlier decades.

Researchers have found that households attracted to urban infill housing products tend be young singles, childless couples, empty nesters, and the elderly. The Bay Area is expected to undergo a dramatic change in its age composition in the next 20 years, portending a potential rise in demand for urban infill and compact housing preferences. For example, due primarily to the aging of "baby boomers," the cohorts of 50 to 64 year olds and 65 to 74 year olds are expected to increase dramatically, rising by 522,000 and 461,500 people, respectively between 2000 and 2020. At the same time, the young adults age 20 to 24 will rise by over 100,000 people. Only an additional 10,600 children are anticipated during the 20 year period, and the typical "move up" home buyers aged 35 to 44 are expected to decline by more than 284,000.

#### Age Distribution for Region 2000 to 2020

Age	2000	2020	Increase	% Increase
0-19	1,899,900	1,910,500	10,600	0.6%
20-24	410,000	511,300	101,300	24.7%
25-34	929,900	1,049,300	119,400	12.8%
35-44	1,214,100	929,800	(284,300)	-23.4%
45-49	546,400	445,700	(100,700)	-18.4%
50-64	1,118,000	1,640,000	522,000	46.7%
65-74	421,300	882,800	461,500	109.5%
75-79	169,100	267,900	98,800	58.4%
80+	230,900	389,600	158,700	68.7%

Source: ABAG Projections 2000, BAE, 2002.

As these demographic patterns shift in the Bay Area, demand for a wide variety of housing types will likely appear, including compact housing near workplaces, small single family attached units with limited maintenance, "granny flats" or second units within established single family neighborhoods, and various types of senior housing.

Headquarters

3

Downtown Rebound (Brookings Institution ,2000)

Urban Infill Housing, Myth and Fact (Urban Land Institute, 2001).



Enter information in the spaces provided and submit the requested attachments.

	Part 1 - APPLICANT INFORMATION & AREA DETAILS <u>Attach</u> resolution showing local support for involvement in FOCUS							
a.	Lead Applicant -City/County							
	Contact Person							
	Title							
	Department							
	Street Address							
	City							
	Zip Code							
	Phone Number							
	Fax Number							
	Email							
b.	Area Name and Location							
C.	Area Size							
	(minimum acreage = 100)							
d.	Public Transit Serving the Area (existing							
	and planned). From this list, please identify at least one route that has							
	minimum 20-minute headways.							
e	Place Type (Identify based on the Station							
0.	Area Planning Manual or from others in							
	Application Guidelines)							
		Current Conditions (Year:	)	Future Goal (Horizon Year: )				
f.	Total Housing Units							
g.	Total Jobs							
h.	Net Project Density (New Housing)							
i.	Minimum/Maximum FARs (New							
	Employment Development)							

	Part 2 – ADDITIONAL AREA INFORMATION		
		Yes	No
a.	Is the proposed priority area currently recognized in the General Plan (i.e., called out as TOD, infill etc.)?		
b.	Have other plans (any targeted planning efforts including specific plans, precise plans, area plans, and supporting environmental studies) been developed within the last 15 years that cover the priority area? Note: If yes, please <u>attach</u> brief list of individual planning efforts and date completed (including web links to electronic versions if available). In the list, identify the primary plan for the area.		
C.	Is the proposed priority area within the boundaries of a redevelopment area?		

FOCUS is a regional, incentive-based development and conservation strategy for the San Francisco Bay Area. FOCUS is led by the Association of Bay Area Governments and the Metropolitan Transportation Commission in coordination with the Bay Area Air Quality Management District and the Bay Conservation and Development Commission. It is partially funded by a regional blueprint planning grant from the State of California Business, Transportation, and Housing Agency.

#### Part 3 – MAPS OF PRIORITY DEVELOPMENT AREA

<u>Attach</u> map(s) showing the proposed boundaries, land use designations and zoning, major transit services, and any other relevant information about the proposed priority area. In your electronic submission, please include GIS files of the PDA boundaries, if available. Photos of current conditions in the priority area are optional.

#### Part 4 - NARRATIVE

<u>Attach</u> separately a maximum two-page (8½ x 11 with 12 point font) narrative that addresses the following questions and provides any other relevant information.

- What is the overall vision for this area? How does the vision align with the place type selected (See Place Type Development Guidelines p. 18-19 in Station Area Planning Manual)?
- What has to occur in order to fully realize this vision and place type? What has occurred in the past 5 years?
- Describe relevant planning processes, and how community members were involved in developing the vision and/or plan for the area.
- Describe how this priority area has the potential to be a leading example of smart growth for the Bay Area.

	L ASSISTANCE REQUESTED (cl this time. This information will aid the development of too	
TECHNICAL ASSISTANCE	REQUEST FOR PLANNING GRANTS	REQUEST FOR CAPITAL GRANTS
<ul> <li>Assistance with photo- simulations to depict future conditions</li> <li>Assistance with local workshops and tours</li> <li>Other:</li> </ul>	<ul> <li>Funding to update existing area- wide specific plan or precise plan</li> <li>Funding for EIR to implement existing area-wide plan</li> <li>Other:</li> </ul>	<ul> <li>Funding for housing projects</li> <li>Funding for water/sewer capacity</li> <li>Funding for parks/urban greening</li> <li>Funding for streetscape improvements</li> <li>Other:</li> </ul>

#### Part 6 - INFRASTRUCTURE BUDGET FOR PRIORITY AREA

Attach a completed Excel file on the FOCUS website for entering information about infrastructure needs and funding sources.

#### Part 7 - FOR EMPLOYMENT CENTER PLACE TYPE PROPOSALS ONLY

Please provide the following information for	the entire jurisdiction.	
	Current Conditions (Year: )	General Plan (Horizon Year: )
Total Jobs		
Total Households		
Total Employed Residents		

E-mail this completed application form and attachments requested to <u>FOCUS@abag.ca.gov</u>, and mail one hard copy of this application and attachments requested to the Association of Bay Area Governments, Attn: Jackie Reinhart, P.O. Box 2050,



#### Application for Priority Development Area Designation

for the San Francisco Bay Area Oakland, CA 94604-2050. Please contact Jackie Reinhart, ABAG Regional Planner, at <u>Jackie R@abag.ca.gov</u> or 510-464-7994 with questions about the application.

FOCUS is a regional, incentive-based development and conservation strategy for the San Francisco Bay Area. FOCUS is led by the Association of Bay Area Governments and the Metropolitan Transportation Commission in coordination with the Bay Area Air Quality Management District and the Bay Conservation and Development Commission. It is partially funded by a regional blueprint planning grant from the State of California Business, Transportation, and Housing Agency.

#### Association of Bay Area Governments

Representing City and County Governments of the San Francisco Bay Area

ABAG

#### MEMO

To:ABAG Executive BoardFrom:Paul Fassinger, ABAG Research DirectorDate:July 1, 2006Re:Projections 2007: A Policy Based Forecast

#### Requested Action: Approval of Staff Recommended Forecasting Assumptions for Projections 2007

#### Summary

The staff is asking the Board to adopt some comprehensive forecast assumptions for Projections 2007 at an early stage in the modeling process. The assumptions serve as a general guide for the forecasting, particularly in regard to regional policies. Similar forecast assumptions were approved by the Board for our earlier *Projections 2003* and *Projections 2005*. Setting these general policy assumptions provides the necessary direction for the forecasting process.

We expect to bring refined information on our monitoring efforts to the Board at its September meeting. This refined information is being developed with technical advisory committees of the Focusing our Vision and Regional Housing Needs Allocation efforts and verified through work we are currently undertaking with local jurisdictions.

#### **Forecast Parameters:**

(1) Some changes to the basic forecast are needed. Updated information on employment suggests that the rate of job production since 2000 has been slower than expected. As a result the forecast of employment in 2005 is lower, and the overall growth in employment is less than in the previous forecast.

(2) Smart Growth policies assumptions should be consistent with information obtained from ABAG's monitoring efforts. In previous forecasts the Board has approved the assumption that smart growth changes to land use patterns that would begin to gradually occur after 2010. Some support for this concept came from a survey of local jurisdictions performed by ABAG staff in spring 2004, where local jurisdictions provided information about smart growth policies.

While that survey was a useful tool, more specific information was needed in order to compare the Projections forecasts to existing land use and land use policies. That information is being developed through ABAG's monitoring program. In response to the policy based forecasts that ABAG began producing with Projections 2003, the Federal Highway Administration and EPA entered into a staff agreement with ABAG and MTC. Their concern was to insure that the policy assumptions for the Projections forecast were reasonable, and compared to trends and policies at the local level. As that agreement has evolved, ABAG is providing general comparative information at a regional level, and specific comparisons of forecasts with local plans and policies for 21 transit corridors across the region.

In order to undertake this effort, ABAG is constructing a GIS database that includes general and specific plans for all of the local jurisdictions in the region. The database currently includes the detailed general and specific plan information. The linkage to GIS shape files will be completed this summer.

Even after the data is complete, some additional tasks remain. In particular we must work with local jurisdictions to verify local plan information and compare it to land use assumptions and results from the Projections 2005 forecast.

While additional consultation and analysis need to take place, our preliminary results indicate that it is appropriate to assume more development near transit and in existing urban areas beginning in 2010 and gradually concentrating a higher percentage of development in those areas over the forecast period. In specific areas it is appropriate to assume higher levels of concentration, and in some, lower levels of concentration.

ABAG is also working with local jurisdictions to identifying changes to existing land use, significant policy changes, and significant errors in the previous data. Information is now available to existing land use in 2005. Policy changes like new general plans, or the designation of redevelopment areas should be considered. Significant errors related to

(3) Current levels of housing production (20,000 to 25,000 units annually) are assumed to continue throughout the forecast period and an increasing percentage of production will be in multifamily housing, although this level of growth will not achieve regional jobs housing balance during the forecast period. This is consistent with previous forecasts assumptions of additional production over "base case" levels. It was assumed that policies to promote housing production would counteract changes in the demographics underlying housing demand (aging population). The development pattern is expected to generally reflect the "network of neighborhoods" concept. Like other assumptions, the rate of housing production will be compared to planning information from local jurisdictions.

(4) Staff should work with the Housing Methodology Committee and the Focusing Ou-Vision's Technical Advisory Committee to develop information and consider that information in our modeling for Projections 2007. ABAG staff is working with these committees to develop specific information that will affect regional assumptions about growth patterns, and the potential for growth in specific jurisdictions. This information should be part of our forecasting process, even if it is not eventually used in these other efforts, or if it is not completely developed for these processes.

2

#### Association of Bay Area Governments

Representing City and County Governments of the San Francisco Bay Area

#### ABAG

#### MEMO

То:	FOCUS Working Group
From:	Paul Fassinger, ABAG Research Director
	Christy Riviere, Senior Planner
Date:	January 29, 2008
Subject:	Linking Performance Targets to Policy Assumptions in Projections 2009

#### Summary

Since 2003, ABAG's Projections have been a "policy-based" population, household and jobs forecast, as opposed to a traditional "trend-based" forecast. Policy is reflected in the Projections through land use assumptions about the location and density of future growth. These assumptions are based on the broad policy statements adopted by ABAG's Executive Board in 2002, at the completion of the *Smart Growth Strategy Livability Footprint Project*.

As policy-based projections, the land-use forecast is the most complete and detailed expression of the region's land-use policies. While the assumptions that make Projections actually policy-based do reflect regional policies, the broad nature of the policies, i.e. increase housing choices and affordability, makes developing, explaining and evaluating the efficacy of the region's preferred land-use pattern agains regional policies ambiguous.

As part of its Regional Transportation Plan update, MTC adopted a series of performance targets. These targets included reducing vehicle miles traveled (VMT) and congestion, and improving air quality and social equity. Sensitivity analyses were then performed to determine how land use and transportation pricing, in combination with various transportation infrastructure investments, could perform against the targets. To test the power of the land-use component, ABAG staff constructed a hypothetical land-use alternative which redirected virtually all new household and job growth to existing communities and transit stations.

The land-use sensitivity analysis allowed staff, decision makers, and the public to clearly see the impact that land use has on region-wide VMT, air quality, congestion and social equity. The analysis also demonstrated the need to re-consider the efficacy of our existing land-use assumptions in Projections. This is because the alternative land use used in the RTP analysis had to be highly aggressive in order to make any measurable difference on the performance targets.

Staff will be recommending that ABAG's Executive Board consider using performance targets at it March 20, 2008 meeting. Staff will also ask that the FOCUS working group to assist us in developing the performance targets and in evaluating alternative land use scenarios against selected targets. Working group input would be taken to most regional policy boards, including the Joint Policy Committee and the Regional Planning Committee. Policy recommendations would then finally be taken to ABAG's Executive Board for consideration. Projections 2009 is scheduled for adoption by ABAG's Board in November 2008.

#### Projections

ABAG's long-term population, housing and job forecast are developed every two years. During 2008, ABAG's staff will be developing the Projections 2009 forecast. Typically, in the first half of the year staff develops the policy-based land use assumptions for approval by the Executive Board, updates local land-use information and performs initial computer modeling. Staff then releases draft numbers for local review in the fall of the forecast year. ABAG's Executive Board adopts the forecast at its November meeting. Upon adoption, ABAG releases the forecast in early December. The jurisdiction level forecast is disaggregated by staff to its detailed census-tract level during the following spring. The completed Projections serve as the base assumptions for the region's transportation plan, published by MTC, and the Air District's air quality conformity analysis.

#### Policy Assumptions

The Projections forecast has never been a simple build out of local plans, it has always considered arger economic and demographic trends. These larger trends now include regional policy assumptions regarding growth. Since 2003, ABAG has been producing "policy-based" population, household and job projections, as opposed to traditional "trend-based" projections. This means, in addition to the demographic and economic assumptions used to develop Projections, regional policy objectives are now a component of the assumptions. Regional growth policies call for more housing to be built in the region than current shorter-term local plans can anticipate. In other words, the amount of housing anticipated in the region is more reflective of the amount of housing the region needs in order to meet is policy goals, rather than what is anticipated to occur under "business as usual". As an expression of regional pol cy, Projections can be conceived as the region's "land use plan."

To adequately reflect regional policies in the development of Projections, staff assumes that more growth will occur in areas with transit, in existing communities and where there are jobs and services - namely in the inner Bay Area and in infill locations. Although the assumptions are reflective of regional policies, there are inherent challenges in making transparent, direct linkages between regional policies and these land-use assumptions. Determining the effectiveness of the assumptions in projections in meeting regional policies is equally challenging. This is because the region's growth policies, as adopted by ABAG's Executive Board in 2002, are extremely broad and generalized:

- Strengthen and support existing communities
- Create compact, healthy communities with a diversity of housing, jobs, activities, and services to meet the daily needs of residents
- Increase housing choices
- Improve housing affordability
- Increase transportation efficiency and choices
- Protect and steward natural habitat, open space and agricultural land
- Improve social and economic equity

#### Why Performance Targets?

For Projections 2009, ABAG's Board will again be asked to evaluate and adopt the land-use assumptions used to develop the forecast. This is an opportune time to consider performance targets in the development and evaluation of projections. Performance targets ought to be considered because: 1) they offer a direct link between the region's policies and the land use assumptions used in Projections and 2) because performance targets can be used to clearly convey the need for continued, assertive local support for regional policies.

#### Transparent Link between Policies and Assumptions

Before Projections are developed, ABAG's Executive Board is asked to make a decision on land-use assumptions. However, there is virtually no assurance that these assumptions will have any measurable positive effect in meeting the region's policy objectives. This is because, as they currently stand, the region's policies are too vague to offer any clear direction for the assumptions. Quantifiable performance targets used to measure the effectiveness of the proposed land-use assumptions and resulting Projections could easily make the difference between a blind decision and a truly informed one. With performance targets, a transparent, direct link can be made between the land-use assumptions and regional policy objectives.

#### Performance Targets Demonstrate the Need for Continued Concerted Action

Local and regional progress toward meeting regional policy objectives has been considerable in recent years. On November 15, 2007, ABAG's Executive Board formally adopted over 100 Priority Development Areas (PDAs). Jurisdictions with PDAs have told us that they can accommodate 56 percent of the region's future growth. This is a clear demonstration of local support for advancing regional policies at the local level. At the regional level, policy-based projections are a significant step in moving the region toward a more sustainable development pattern. The Bay Area's recent Regional Housing Needs Allocation is and will probably remain the most progressive and aggressive allocation in the state. RHNA clearly redirects housing to areas with jobs and transit, giving places like Oakland, San Francisco, Berkeley, Fremont and San Leandro substantially more housing responsibility than rural, transit-poor jurisdictions are given.

As part of its Regional Transportation Plan, MTC developed a series of performance targets; including reducing vehicle miles traveled (VMT), congestion and improving air quality and social equity. A performance analysis was then done to estimate how land use and transportation pricing, in combination with various transportation infrastructure investments, could perform against the targets. To test the power of a land use component, ABAG staff constructed a hypothetical or "what if" land-use alternative which redirected new household and job growth to existing communities and placed an enormous emphasis on areas with transit.

However, the performance analysis conducted by MTC demonstrated that we may need to do much more. In order to move the needle at all relative to the region's transportation, climate-change and other environmental quality performance targets, including those based on State statutory requirements, the alternative "what if" land use scenario had to be a highly aggressive. This land-use scenario, along with a complementarily aggressive pricing strategy is what made the difference in achieving the targets, more so than any of the transportation infrastructure investment packages. The land-use scenario was substantially more aggressive than the growth seen in the PDA applications, or the goals identified at the end of the *Smart Growth Regional Livability Footprint Project*. Therefore, the performance analysis demonstrated that more substantial deviations from business-as-usual will be required if the region intends to meet its policy objectives, i.e. to conserve natural resources, reduce VMTs, alleviate congestion and to improve air quality and social equity.

#### Next Steps

#### Develop Performance Targets

Over the next few meetings, ABAG staff would like to work with the FOCUS working group to develop a set of performance targets. The targets would then be used to test various regional land use assumptions and growth scenarios.

In developing and selecting the targets, staff recommends beginning with the targets used by MTC for the Transportation 2035 sensitivity analysis. Each target is intended to reflect the three E's – economy, environment, and equity. Some of the targets are also linked to state mandates.

The specific targets, and their source or references are:

#### **Economy: Congestion**

• Reduce person hours of delay by 20 percent below today's levels by 2035

Source: Governor's Strategic Growth Initiative

#### Environment: Carbon Dioxide (CO2) and Particulate Matter (PM) Emissions

- Reduce CO2 emissions by 40 percent below 1990 levels by 2035
- Reduce PM2.5 emissions by 10 percent below today's levels by 2035
- Reduce emissions of coarser particulate mater (PM10) by 45 percent under today's levels by 2035

#### Sources:

CO2 – California Global Warming Solutions Act of 2006 and Governor's Executive Order S-20-06 PM– State and national standards

#### Environment: Vehicle Miles Traveled (VMT)

• Reduce VMT per capita by 10 percent compared to today by 2035

Source: California SB 375 (Steinberg) (2007-08 Legislative Session), prior to amendment

#### Equity: Affordability of Housing and Transportation

Decrease by 10 percent from today the share of household income consumed by housing and transportation costs for low and lower-middle income households

Source: Adapted from the Center for Housing Policy report A Heavy Load: The Combined Housing and Transportation Burdens of Working Families (October 2006)

These targets, along with staff recommendations for additional targets and/or further consideration of the equity and possibly other targets would be brought back to the working group for discussion at the March meeting. The working group's recommendations would then be taken to the Joint Policy Committee and Regional Planning Committee.

#### Develop Alternative Land Use Assumptions & Scenarios

Once performance targets are selected, alternative land-use scenarios, each with varying degrees of landuse assumptions regarding the location of growth, would be run and tested against the performance targets. In addition to land use, ABAG staff would develop assumptions regarding multi-family housing, travel behavior and telecommuting. Staff would also work with MTC to develop assumptions regarding transportation pricing and use of alternative fuels. This package of assumptions and how they "perform" against the targets could then be vetted through the working group, with recommendations brought to policy makers.

#### Conduct Review

Staff proposes that there also be local review and discussion of the targets, the land use assumptions and draft Projections 2009 city-level and census tract land use data. Such a process could aid the regional agencies in conveying to local governments the policy assumptions behind the projections and how those assumptions result in land use data, especially housing estimates, which at times departs from current local plans. This would allow regional decision makers, including ABAG's Board members, local governments and other interested parties to clearly understand the ramifications of any decisions made regarding the region's policy-based Projections, or preferred land use pattern, in addition to the other assumptions required to meet the region's established performance targets.

Extensive policy level discussions and one-one meetings with local governments about performance targets and the land use assumptions needed to meet those targets may translate to greater local government support for stronger policy in policy-based projections, and for supporting a regional transportation plan that rewards jurisdictions who take on the focused growth challenge.

#### Adopt Alternative: Projections 2009

Upon completion of the selection of performance targets, development and testing of alternative scenarios and regional and local review, ABAG staff would develop draft the draft Projections 2009. This Projection would be brought before ABAG's Executive Board for adoption at their November 2009 meeting.

#### Association of Bay Area Governments

Representing City and County Governments of the San Francisco Bay Area

#### ABAG

#### МЕМО

To:	ABAG Executive Board
From:	Paul Fassinger, ABAG Research Director
	Christy Riviere, Senior Planner
Date:	May 1, 2008
Subject:	<b>Projections 2009: Performance Targets</b>

#### Summary

On March 20<sup>th</sup>, the Executive Board adopted a set of draft performance targets for use in developing the land-use policy assumptions in ABAG's bi-annual forecast of population, job and household growth. The targets align with those used in the regional transportation plan update, with the region's policy objectives and the State's climate change goals, including Assembly Bill 32. Since February, staff has been conducting local government outreach on the idea of performance targets. In this report, we summarize the lessons learned from that outreach. We also offer recommendations for the Executive Board's consideration.

#### Invaluable Outreach

Staff first presented the idea of using performance targets to develop the land-use policy assumptions in *Projections 2009* to the Joint Policy Committee in January 2008. Targets could elevate the dialogue about land use and its role in meeting regional and state objectives, including climate change. Targets could also provide transparency in the development of the land-use assumptions used in the region's forecasts. If performance targets are adopted, scenarios would be constructed to show a variety of household and job growth patterns. The scenarios would be tested against the targets to see how well they "perform".

In response to this proposal, JPC members suggested staff seek input from Bay Area elected officials and local planning staff. Staff has since held 12 county-wide meetings throughout the nine-county Bay Area, each hosted by at least two elected officials. These meetings have been exclusively targeted to elected officials and senior city/county planning staff, rather than the general public.

All meetings began with staff making a 10-minute, context-setting presentation. We offered background information about the land use, transportation, climate change connection and the region's policy-based projections. We then presented the idea of performance targets and how they may be useful in conveying our regional and climate change challenges, especially in relation to land use. Ted Droettboom, the .PC Regional Planning Program Director, then facilitated a dialogue on the issue.

Attendees generally supported the idea of targets, though some concerns were also expressed. Below is a summary of what we learned from our conversations with local governments about performance targets. This summary is drawn from the direct or indirect questions asked or comments made during the meetings. Remembering these lessons will prove invaluable as we move forward.

#### **Manage Expectations**

Our outreach to local governments revealed and may have even created heightened expectations of what could be accomplished through performance targets. To prevent a situation where staff feels overwhelmed

and where people feel unheard, confused or frustrated by what feels to be dismissive treatment of their input, it is imperative that we better manage expectations. This is done by more fully describing what targets are, how they will be used, and their limitations.

Performance targets are quantitative representations of the level and timing of results which we hope to achieve through a plan or program. Targets can also be used to comparatively assess actual achievements. Targets need not be constrained by reality. They can be stretch objectives which are desirable for identified reasons, but for which we acknowledge the difficulty of actually reaching.

Staff recommends that performance targets be used in the *Projections 2009* development process to identify environmental, land-use and transportation related regional objectives. Staff would develop alternative scenarios, each with varying assumptions and test them via sensitivity analysis though the region's land use and transportation models.

The alternative land-use scenarios are based on "inputs" or assumptions that go into the models. Other inputs include economic and demographic data, transportation infrastructure, transportation costs, and mode choice or travel behavior. Using these assumptions, the model projects a series of impacts for our the land use, transportation and air quality metrics. These metrics are "outputs" of the models, and include: congestion, vehicle miles traveled, access to jobs and other land uses, carbon emissions and particulate matter. The assumptions that go into the models, including the land use assumptions, can be altered to ascertain the effect on these metrics.

The land use and transportation models are the only tools we currently have to determine future consequences of a projected land-use pattern. Therefore, the models set real limitations on which targets can be selected for use in sensitivity analysis. To address other metrics that cannot currently be modeled, those of interest to both regional and local policy makers, staff suggests creating a comprehensive "regional progress report." This report would be used to track progress toward a more complete set of regional metrics. This may include school impacts, water consumption, housing affordability, energy use, as well as others.

Staff proposes developing a full set of metrics to be brought back to the Board for their consideration. Once the list of metrics is finalized, staff will monitor these metrics in a "regional progress report."

#### There's No Silver Bullet

If the region is to make any measurable progress toward meeting the proposed targets, including reducing transportation-related green house gases, a multi-faceted approach will be required. Transportation infrastructure, transportation pricing, technology, behavioral changes, and alternative land use strategies will all be required. Through the Regional Transportation Plan, regional agency staff is developing a transportation infrastructure investment package that moves us closer toward the targets. Regional policy-makers are also exploring transportation pricing policy options. Policy-based projections, i.e. *Projections 2009*, and the FOCUS program are clear opportunities to pursue a climate-friendly regional land-use strategy. In doing so, we must clearly convey to local governments that land use alone, no matter how aggressive, will not achieve the targets. Land use is necessary, but not sufficient. The region will need to collectively pursue all strategies in a multi-faceted approach if it seriously intends to meet AB32-related targets.

#### Targets, not Mandates

Local governments clearly do not welcome state or regional land-use mandates. In our outreach meetings, we have conveyed that performance targets would only be used to better inform local and regional land-

use decision making. The targets would be used to test alternative land-use scenarios. These alternative scenarios would be reviewed thoroughly by local governments. Ideally, this review could elevate the dialogue about land use in this region, for targets could better convey, both at the local and regional level, the individual and collective impacts of our land-use decisions. Through the *Projections 2009* process, we will work with local governments to arrive at a preferred regional land-use scenario, one that is responsive to their local issues, as well as regional, state and global environmental objectives.

#### Land Use Dialogue is Crucial

Our willingness to openly discuss land use has been well received by local governments. Most local governments recognize that the regional/local land use conversations needs to happen because of the crucial role land use plays in our region-wide green house gas emissions. In fact, the Land Use Subgroup of Climate Action Team (LUSCAT), the committee charged with recommending AB32 implementation strategies to the California Air Resources Board (ARB), has recommended that regional transportation/land use carbon emission targets be established. These targets would determined by each region through the development of an alternative land-use scenario – one that would be effective in reducing region-wide carbon emissions.

Nearly every community, from San Francisco to Sebastopol, has thanked us for taking on the challenge in relaying this important message. Staff has been asked to communicate the land use/transportation/climate change message at several individual council meetings. Staff intends to meet as many of these requests as feasibly possible, considering time and staff resource limitations.

#### Change is Inevitable

By 2035, an additional 2 million people and 1.8 million jobs will be in the Bay Area. If we are to house all our workers and newly formed households within this region, rather than in communities adjacent to this region resulting in more long-distance inter-regional commuting, than the Bay Area will need nearly 700,000 new housing units. Understanding the components of growth, i.e. births and new jobs, would go a long way to dispelling the myth that if we simply don't plan or build housing than we will stop growing.

Population growth occurs due to two primary reasons. The first is natural increase—the number of births minus deaths in the region. Typically, in a given year 40-50,000 more people are born than die in the Bay Area. This creates a net-increase in the Bay Area's "natural" population. The second cause of population growth is in-migration. People move to the Bay Area for economic opportunities. Continued natural increase and economic development means continued Bay Area population growth. The question, therefore, isn't will we grow, but rather: Can we agree to grow in a way that also meets our regional transportation and environmental objectives?

#### Everyone Loves a Good (Solved!) Mystery

Appreciation for our willingness to open up the projections black box, to be more transparent, was universal. Many people agreed that targets and a more comprehensive local review of draft projections data would help in increasing transparency and understanding of the projections development process. Local governments clearly want more understanding of both the model and policy-component of projections. They especially want to know how regional policy-objectives may result in job and housing numbers that may differ from their local plans.

Local governments often ask about the accuracy of projections. Past forecasts have typically been within 5 percent of actual population, household and job estimates, at the county level. Conveying to local governments our track record on the accuracy of the regional land-use forecast, in the short-term, may be

helpful. However, policy-based projections are not meant to be "accurate" in the long-term, they are intended to push the region toward specific growth policies. Furthermore, there is no measure to determine the accuracy of projections, in the latter years, against local plans. Many local plans in the Bay Area do not go out to 2035, they typically extend to 2015 or 2020. The policy land-use assumptions in *Projections* have their greatest effect in the latter years of the forecast. The lack of local data available in the later years, and because most general plans will be updated, perhaps several times, before 2035, staff intentionally puts regional policy assumptions into effect in the latter years of the forecast. This allows for the most opportunity for them to be realized; for regional land-use policy assumptions in the forecast, and therefore the forecast itself, will only prove accurate if supporting local land use policies are pursued by local governments. Conveying this message to local governments will be a crucial part of the *Projections* 2009 process.

#### **Staff Recommendations**

Staff recommendations are largely based on the above summarized lessons. Staff recommends:

1. That the Executive Board adopt a revised set of regional performance targets. These targets would be used by staff in developing and testing the land-use policy assumptions for *Projections 2009*. Staff recommends only these targets because they can be modeled via the regional land use/transportation model.

#### **Economy: Congestion**

• Reduce person hours of delay by 20 percent below today's levels by 2035

#### Environment: Carbon Dioxide (CO2) and Particulate Matter (PM) Emissions

- Reduce CO2 emissions by 40 percent below 1990 levels by 2035
- Reduce PM2.5 emissions by 10 percent below today's levels by 2035
- Reduce emissions of coarser particulate mater (PM10) by 45 percent under today's levels by 2035

#### Environment: Vehicle Miles Traveled (VMT)

• Reduce VMT per capita by 10 percent compared to today by 2035

#### **Environment: Land Consumption**

Limit regional greenfield development to 900 acres per year

#### Equity: Affordability & Access

- Increase non-automobile dependent access to jobs and essential services by 20 percent compared to today by 2035
- 2. That the Executive Board direct staff to develop and test alternative land-use policy assumptions through scenarios via the region's land-use and transportation models. The scenarios will reveal the efficacy of the alternative land use assumptions against each of the targets. Further, that the Board direct staff to vet the results of the sensitivity analysis through local governments and stakeholder groups before bringing the analyses back to the Board for their consideration.
- 3. That the Executive Board direct staff to identify and monitor regional policy-based metrics that can not be forecasted through the current regional land-use or transportation models. This would be done through a periodic Regional Progress Report. For these metrics, regional "goals" could be set. Progress towards goals could be tracked on an annual or biannual basis. Metrics could

> include: housing and transportation costs, water consumption, energy use, as well as others relevant to regional policies and as identified by Board members. If directed by the Board, staff would bring draft metrics to the Board at a future meeting for their consideration.

#### Next Steps: Schedule

If directed by the Board, staff will proceed with developing alternative land-use scenarios, each with varying land use assumptions. Staff will test these scenarios to determine how well they perform against the targets. Staff will then vet the alternative assumptions and their impact on the targets through local governments, and stakeholder groups. Draft scenarios will also be brought before both the Joint Pol cy Committee and ABAG's Executive Board. Feedback from the local government and stakeholder review will also be brought back to the JPC and Executive Board. One alternative would brought to the Executive Board for its approval as *Projections 2009*.

#### **DRAFT SCHEDULE**

*April/May* Complete Targets Outreach Final Targets, May Executive Board

June/July

Draft Projections 2009 - possibly at census tract level Draft Alternative Land Use Assumptions & Scenarios July ABAG Board & JPC: Review of Alternative Land Use Assumptions/Scenarios

#### August/September

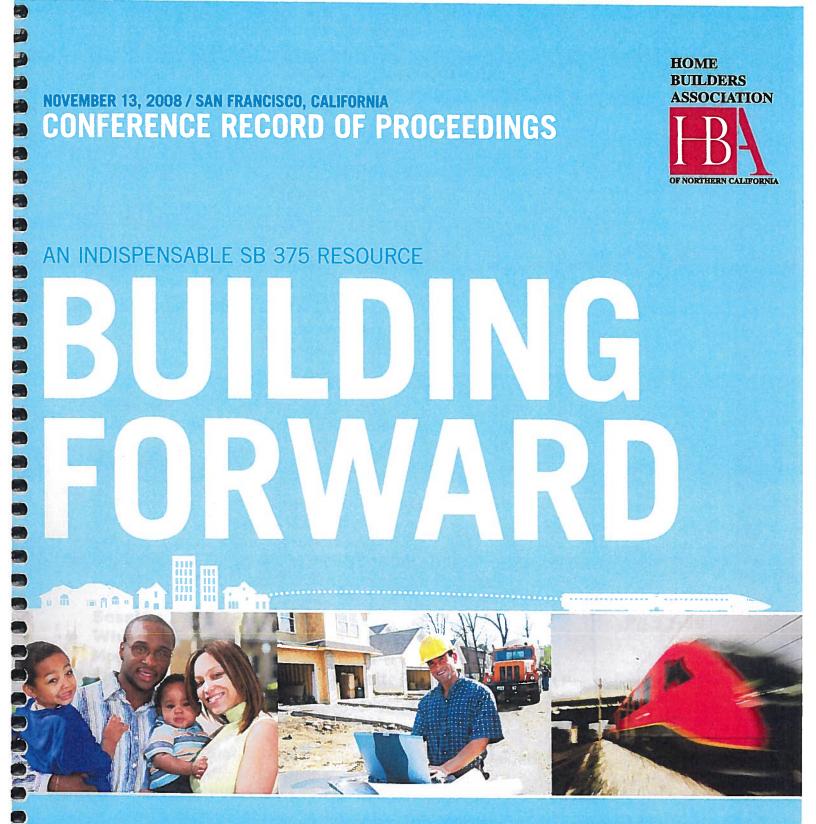
Round 1: Local Review of Alternative Land Use Assumptions/Scenarios Round 1: Stakeholder Review of Alternative Land Use Assumptions/Scenarios Revise Land Use Assumptions/Scenarios based on Local/Stakeholder Review September Executive Board & JPC: Local Review Progress Report & Revised Assumptions/Scenarios

#### October/November

Round 2: Local Review of Alternative Land Use Assumptions/Scenarios Round 2: Stakeholder Review of Alternative Land Use Assumptions/Scenarios Develop Staff Recommendation of Draft Alternative Land Use Assumptions/Scenario November JPC: Review Draft Alternative Land Use Assumptions/Scenario November Executive Board: Consideration of Draft Alternative Land Use Assumptions/Scenario

#### December/January/February

Develop Staff Recommendation: Final Alternative Scenario as Projections 2009 January JPC: Present Board Recommended Final Alternative Scenario January Executive Board: Consider Adoption of Final Alternative Scenario as Projections 2009 Produce Projections 2009 Document

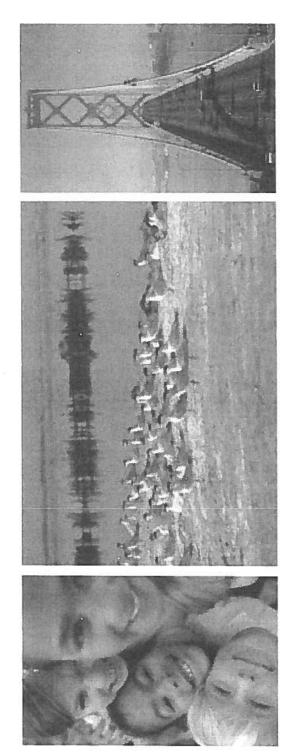


BUILDING FORWARD

**CREATING A SUSTAINABLE CALIFORNIA** AND FIGHTING GLOBAL WARMING WITH SB 375



NINE-COUNTY BAY AREA SHAPING THE FUTURE OF THE



Alternatives Report for Round Two Public Workshop Participants and Other Bay Area Residents

**APRIL 2002** 

This Alternatives Report provides the basis for a second and final round of countywide workshops to be held throughout the Bay Area on Saturdays in spring 2002:

MARIN COUNTY: APRIL 13 SONOMA COUNTY: APRIL 20 SAN FRANCISCO: MAY 4 SANTA CLARA COUNTY: MAY 4 CONTRA COSTA COUNTY: MAY 11 SAN MATEO COUNTY: MAY 11 SOLANO COUNTY: MAY 11 ALAMEDA COUNTY: MAY 18 All workshops: 8:30 a.m. – 2:45 p.m. Breakfast and lunch served to registered participants.

NAPA COUNTY: MAY 18

Please visit www.abag.ca.gov/planning/smartgrowth to:

Find out workshop locations.
Obtain more information about this project.
Register for a county workshop.

Read the technical appendices to this Alternatives Report.

Table of Contents	Overview	INTRODUCTION	THE ALTERNATIVES	BEYOND THE WORKSHOPS	THE ANALYSIS	ENVIRONMENT	1.0 TRANSPORTATION	1.2 HOUSING	16 SOCIALAND ECONOMIC EQUITY	2.0 DEVELOPMENT FEASIBILITY	INCENTIVES AND REGULATORY CHANGES	26 THE UNIQUE CHALLENGE OF AFFORDABLE HOUSING	THE ALTERNATIVES UP CLOSE	28 CURRENT TRENDS BASE CASE	30 ALTERNATIVE I: CENTRAL CITIES	2 ALTERNATIVE 2: NETWORK OF NEIGHBORHOODS	3-4 ALTERNATIVE 3: SMARTER SUBURBS	MAP OF THE ALTERNATIVES
	2	2	SMART GROWTH STRATEGY 4	REGIONAL LIVABILITY FOOTPRINT PROJECT	Alternatives Report $7$ T	8		APRH. 2002 1	1	C1	23 13	CI	27 T	2	.0	32	3	INSTDE BACK COVER - M

	-	
	620	
	2.13	
	-	
	Dallo	
	1 RC	
	221	
	HR.	
	<b>1</b> 1 1 1	
t	-	
	-	
	-	
	Ζ.	
	INTH	
	22	
	<b>Pr</b> 74	
	80 H	
	-	
	3	
	600	
	es i	
2	100	
	1.1	
ſ	1121	
	LOOA .	
	Jan!	
	221	
	E	
	C21	
	222	
	200	
	Het.	
	- C.	
	622.1	
	~	
	241	
i		
	L LIVABII	
	51	
	2	
	NAL NAL	
	NAL NAL	
	<b>DNAL</b>	
	<b>FOXAL</b>	
	<b>BONAL</b>	
	ANOIS NO	
	RECHONAL	
	ANOIS NO	

WEALTH OF INNOVATIVE IDEAS for building a better future. CREATIVITY and VISION of our diverse population. As we face the challenge of balancing continued growth with a high quality of life. Bay Area residents have a Blessed with an abundance of NATURAL, CULTURAL AND ECONOMIC assets, the Bay Area has an even greater treasure in the DEDICATION







## INTRODUCTION

Trading horror stories about long commutes, endless traffic jams and high housing costs has become a favorite sport in the Bay Area. In the fall of 2001, some 1,000 Bay Area residents decided to stop complaining, and start taking a more direct role in shaping the Bay Area's future. The participants in this unusual urban planning exercise each devoted the better part of a Saturday to, literally, redrawing the regional map. They came from a wide range of backgrounds and professions, with a variety of agendas. But they shared a common goal: to maintain and enhance the Bay Area's unique beauty, natural resources, diversity and lifestyle in the face of persistent growth. The workshops attended by these "planners for a day" were part of a project known as the **Smart Growth Strategy/Regional Livability Footprint Project**. At each workshop, overflow crowds of elected officials, representatives of neighborhood groups, developers, environmentalists and social equity advocates used an innovative computer modeling program as a springboard for lively discussions and negotiations about the pace, character and shape of development in their communities. A number of features set this effort apart from prior attempts to steer the region toward a more livable future. Key among these is

the broad sponsorship and high level of buy-in from the private sector and local and regional governmental institutions. The project is sponsored by five regional agencies\* — whose missions span transportation planning, environmental protection and local government coordination — along with the Bay Area Alliance for Sustainable Development, a coalition of over 40 business, environmental and social equity organizations.

The project also is notable for its bottom-up approach to solving the region's twin problems of traffic congestion and insufficient housing. This experiment in good government and popular democracy has tapped into a wellspring of creative ideas for building a better tomorrow. This booklet distills the first round workshop findings into three distinct visions for the Bay Area's future. In the coming weeks, residents will again answer the call to action, and gather for a second set of county-level forums where they will select a preferred smart growth alternative and tailor it to their communities. Even if you did not attend the fall Round One workshops, your participation in Round Two is critical. Nothing less than the future health of the Bay Area — and the quality of life for our current and future residents — is at stake.

Association of Bay Area Governments (ABAG), Metropolinan Transportation Commission (MTC), Bay Area Air Quality Management District (BAAQMD), Bay Conservation and Development Commission (BCDC) and Regional Water Quality Control Board (RWQCB).

# What is Smart Growth, and How Do We Get There?

Smart growth is as much about lifestyle as it is about the built environment. For many Bay Area residents, smart growth might translate to having the possibility of getting to work without a car or without suffering a numbing, hours-long commute, or the option to easily run errands by bicycle or on foot. Smart growth can mean being able to escape the pressures of daily life in the vast stretches of open space that lie just beyond the urbanized area. On a more immediate level, it can mean getting a foothold in an otherwise impenetrable housing market thanks to an ample supply of moderate- and low-cost housing. In looking for models of smart growth, Bay Area residents need go no further than their own back yards. In both suburbs and inner cities, seeds of smart growth are beginning to sprout. Faceless strip malls are giving way to attractive, mixed-use plazas that invite walking and social interaction. Where uninterrupted tracts of single-family homes have long ruled, pockets of highdensity housing are taking shape, often near transit stations. Jurisdictions that once embraced development at any cost are drawing the line on growth, and setting aside precious open space for future generations. And here and there, city streets tectering on the edge of urban decay are getting a facelift and an infusion of investment.

### **Project Goals**

Slowly but surely, project by project, local governments, developers and nonprofits are working together to redraw the "footprint" of urbanization. A major goal of the Smart Growth Strategy/ Regional Livability Footprint Project is to nurture these smart growth ventures, and propagate them more widely across the region's nine counties and 101 cities. In the process, project sponsors hope to provide sufficient — and appropriately placed and priced — housing throughout the region without eroding prisline lands and open space.

More than a paper exercise, the Smart Growth Strategy/Regional Livability Footprint Project aims to change the underlying fiscal and regulatory infrastructure that is at the root of current growth patterns. Round One workshop participants spent a good deal of time formulating incentives and reforms that regional agencies, the state and even federal government could enact to make smart growth investments attractive and feasible. In Round Two, participants will refine this menu of "carrots and sticks" to come up with the most promising options for action by regional agencies, the California legislature and Congress.

Another important product of the workshop process will be an alternative set of 20-year land-use and transportation projections that — if adopted by ABAG — will in turn guide the infrastructure investments of the Metropolitan Transportation Commission and other regional partners.

# The Round One Workshop Process

The heart of the fall workshops was a tabletop exercise in which groups of 10 or so gathered around a large, colorful map of their county, and pinpointed promising locations for new development. Working against the clock, they mixed and matched neighborhood and development types to come up with an idealized vision of the future. As they weighed their choices, a specially trained project staff member fed their suggestions into the PLACE3S computer program, which modeled the results. In just a few minutes, the computer allowed participants to determine the impacts of their decisions on their county's housing supply, open space, transit accessibility and other measures of livability, and to adjust their maps accordingly. This appears to be the first time any region in the country has engaged in a computerized group mapping exercise on this scale. Not surprisingly, there were some glitches here and there. Nonetheless, workshop evaluations were overwhelmingly positive, with a number of participants wishing they could have spent even more time on the exercise.

MORE THAN a paper exercise, the Smart Growth Strategy/ Regional Livability **Footprint Project aims to CHANGE** the **underlying** fiscal and regulatory **infrastructure** that is at the ROOT of current growth patterns.

## **GROWTH TRENDS**

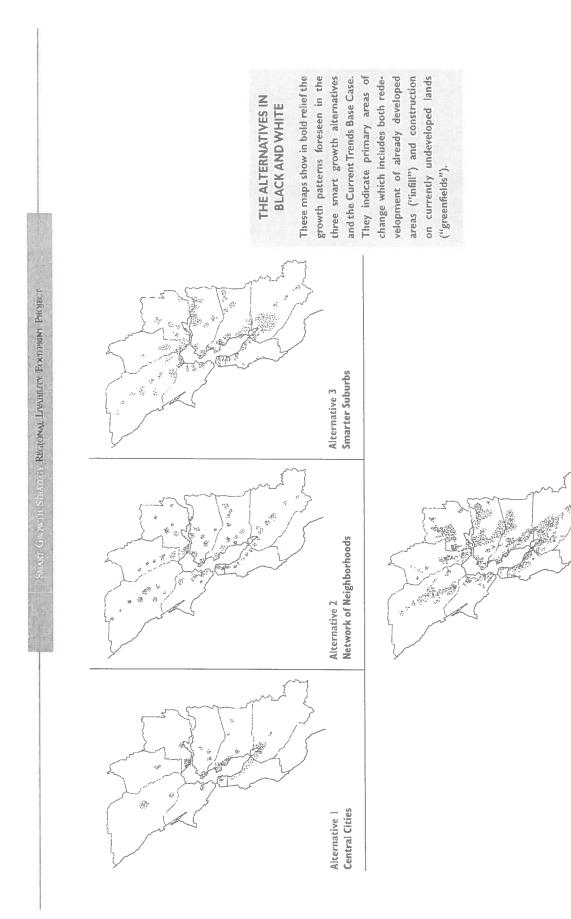
Area will grow by 1 million residents 65,000 commuters flowing into the Bay Bay Area each day from outhing dents predicted for 2020 will be part of the workforce, the worker/job gap 3 and I million jobs between now and the year 2020. On the surface, that sounds like a perfect balance, but take I closer look. Already there are more obs than workers, with some areas. Since not all of the new resications for housing demand, traffic, air is projected to worsen, with the numquality and open space, both within grow. This trend has ominous impliber of in-commuters expected If current trends continue, the and outside the Bay Area. An argument could be made for addressing this imbalance by curtalling the region's economy and job expansion. But fully half of the projected new residents will result not from inmigration from other areas, but from births outpacing deaths. In other words, the smart growth debate is not only about accommodating newcomers, but also about leaving livable communities for our own children and our grandchildren.

## THE ALTERNATIVES

Many of the participants in the Round One smart growth workshops came to view the projected wave of growth not as a threat, but as an opportunity to build more livable communities. Each county workshop produced as many as a dozen schemes for accommodating future growth in a smarter way. Multiply that by nine workshops, and you have upwards of 100 countywide smart growth scenarios for the Bay Area. In the ensuing weeks, the project team combed through the scenarios in search of common threads. Ultimately, the many scenarios were distilled into three regionwide, thematic smart growth alternatives. All three alternatives include housing for the million new residents expected by 2020, plus about 270,000 additional units to house workers (and their families) who would otherwise commute to the region from neighboring counties. By extension, all three alternatives allow for projected economic growth — and at the same time enhance the region's livability. The three alternatives represent the breadth of ideas put forth by Round One participants. Even if the region's growth were to be slowed, these smart growth alternatives are still worth considering. They provide a framework for a more rational and livable future, no matter how fast or slowly our population grows. Alternative 1 (Central Cities): Locates compact, walkable, mixeduse and mixed-income development in the region's urban cores (San Francisco, Oakland and San Jose) and in each county's largest city or cities. Also locates new growth around existing public transit stations. Alternative I avoids development in outlying areas and hearkens back to an earlier era, when growth was concentrated in dense, vibrant cities and public transit was the preferred and most convenient commute mode. Imagine bustling mini-cities within cities and you have a picture of the effect growth in Alternative I would have on the region's principal urban centers.

Alternative 2 (Network of Neighborhoods): Calls for development in many of the same locations as Alternative 1, but at lower densities. Additional compact, walkable, mixed-use and mixedincome development in other existing communities, along an expanded public transit network and on major corridors. Under Alternative 2, the region could see a rail renaissance, with stations — new and old — surrounded by compact, mixed-use development offering a range of housing types, jobs and the full spectrum of services, from cafes to dry cleaning and childcare. Many key thoroughfares throughout the region also would be in line for revitalization. Alternative 3 (Smarter Suburbs): Compact, walkable, mixed-use and mixed-income development in many of the same places as Alternatives 1 and 2, but at still lower densities. Additional growth at the region's edges at higher densities and with a better balance of jobs and housing than has been typical. On the surface, this alternative looks a lot like a continuation of current trends, but with a couple of important twists. The development in this alternative would balance some of the single-use development on the ground today — introducing a mix of housing types in the vicinity of office parks, and jobs to areas that are currently housing-rich — and would be denser than most existing or planned new suburbs.

**Current Trends Base Case:** Though quite distinct from each other, the three alternatives share a common denominator: Each represents a departure from the "Current Trends Base Case," a term coined to refer to the "business as usual" pattern of growth that lies before us if we do nothing to chart a new course. The Base Case falls short in providing sufficient housing for workers, resulting in an ever-increasing in-commute. It envisions continued development in edge communities, with residential areas largely segregated from other uses. By extension, for many trips, the automobile will continue to be the primary mode of travel. See the "Alternatives Up Close"chapter and the fold-out map at the back of this report for more information on each alternative.



**Current Trends Base Case** 

ĵ,

We are at a critical juncture in the region's evolution, where **decisions** made today will have LASTING IMPLICATIONS for **how we,** our children and our children's children **live,** work and play, far

## TECHNICAL APPENDICES

For more detailed information behind the analysis summarized in this report, please see the online technical appendices at: www.abag.ca.gov/planning/ smartgrowth/TechAppendix.html

## Analysis of the Alternatives

Once framed, the three alternatives were subjected to a battery of tests to see how they measure up in terms of promoting a livable and sustainable lifestyle in the Bay Area circa 2020. And the results are in: Although all three alternatives envision considerably more housing — particularly more affordable units — than would the Base Case, they would consume less greenfield land. Indeed, because of the relatively compact and balanced nature of envisioned development, all three alternatives would result in less travel per capita and somewhat improved air quality compared to the Base Case. That's not to say all three alternatives perform similarly on all levels. Go a little deeper, and some marked differences emerge. While all three smart growth alternatives house about the same number of people, they differ in their impacts on social equity, the environment and the jobs/housing match. The alternatives also have varying implications for residents' mobility and access to public transit.

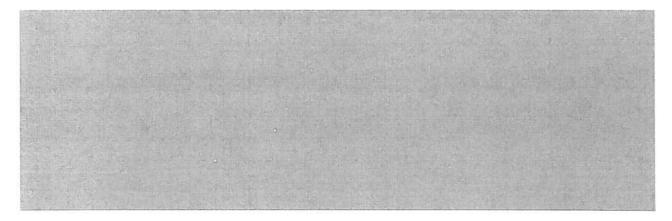
into the future.

### The Round Two Workshops: Creating the Preferred Alternative

The three smart growth alternatives are presented as a framework for discussion. Round Two workshop participants will, no doubt, adjust or blend the alternatives to create the ideal vision for each particular county. The hours and creative energy that you devote to the upcoming phase of this groundbreaking workshop process might be among the most important investments of your life. We are at a critical juncture in the region's evolution, where decisions made today will have lasting implications for how we, our children and our children's children live, work and play, far into the future.  Results from the concurrent "Contra Costa: Shuping Our Future" process will be incorporated into the regionwide preferred smart growth alternative.

# **BEYOND THE WORKSHOPS**

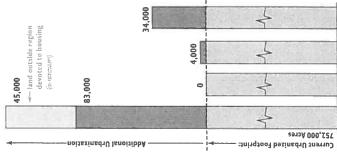
The preferred land-use alternatives that emerge from each county's Round Two workshop will be knit together to form a preferred regionwide alternative for growth in the Bay Area\*. The regionwide alternative will be expressed in terms of a detailed map that will show the type and location of future development preferred by Round Two workshop participants — as well as areas to be protected as open space. An accompanying report will detail this proposed vision for the future while outlining the fiscal incentives and regulatory changes needed to get there. In many ways, the publication of the final project report will be a beginning rather than an end, launching a multi-pronged, multi-year process to create a hospitable environment for this new way of growing. Step one will involve a public education and engagement campaign, to be spearheaded by the Bay Area Alliance for Sustainable Development, the coalition of business, environmental and social equity organizations that cosponsors the Smart Growth Strategy/Regional Livability Footprint Project. The five regional agencies involved in the project likewise have their work cut out. The Association of Bay Area Governments (ABAG) has pledged to consider revising the region's jobs/housing projections to reflect the final smart growth vision. If the projections are revised, the Metropolitan Transportation Commission (MTC), in turn, will factor the region's new smart growth projections into its travel model — just in time for development of the next *Regional Transportation Plan*, which will guide transportation investments in the region well into the future. And all project partners will vigorously pursue incentives and regulatory changes to encourage smarter development. This might mean reinventing their own policies and programs while working with lawmakers in Sacramento and Washington to fornulate new laws and incentives to launch the Bay Area toward a marter future.



# THE ANALYSIS

### ENVIRONMENT





# 66 Messages from Round One

- Let's try balancing open space and development in urbanized areas.
- People need more access to open space including parks and greenbelts in urban areas.
  - We should preserve sensitive habitats for both plants and animals.
- We have to work harder to preserve air and water resources.
- It's time to protect agricultural lands.

8

## **Greenfield** Development

If the Bay Area continues to grow as it has in the recent past, 83,000 acres of currently undeveloped land could be covered with new structures by 2020. Amounting to an 11 percent increase in the urbanized Bay Area, this acreage is more than twice the area of San Francisco and will crode farmland, greenbelts, community separators and other types of open space. Moreover, the housing units that would need to be built outside the Bay Area to accommodate in-commuters might require about 45,000 additional acres, assuming current average densities in surrounding counties of four to six units per acre.

Alt.3

Alt. 2

Alt. 1

Base Case

Participants in all nine county workshops soundly rejected this Base Case future and instead suggested that expected job and housing growth should occur in compact, walkable communities in a variety of already-developed and new locations. Some went further with their land-use scenarios, confining all new growth to areas that are already developed today.

As shown on the fold-out map at the back of this report and on the adjacent bar chart, all three smart growth alternatives require considerably less greenfield development than the Base Case. This is remarkable, given that the alternatives each include on average 270,000 more housing units than the Base Case. How can this be? How can a future that provides housing for all Bay Area workers within our nine counties consume less land, both within the Bay Area and beyond, than one that will require over a quarter of a million people to commute for hours each day to Bay Area jobs? The answer lies in the prevalence of mixed-use, compact communities that workshop participants envisioned for themselves and their children. This pattern of growth protects precious open space and agricultural land, both within the Bay Area and, possibly, in outlying areas such as the fertile Central Valley.

But all smart growth alternatives are not created equal in terms of greenfield development. While no development in Alternative 1 and just 4 percent of newly-developed acreage in Alternative 2 would be on greenfield land, 23 percent of land developed under Alternative 3 would need to be plowed under.

### Air Quality

Paving over portions of paradise is not the only way that future development will impact the Bay Area's environment. Air quality, too, will suffer or improve, depending on exactly how the region grows. The more that residents, workers and others must depend on the single-occupant vehicle, the more polluted our air will be. Since the three smart growth alternatives attempt to house all Bay Area workers within the region, it is interesting to see if the 265,000 residents who would otherwise commute from afar and their families will drive up the region's drive-alone rate or if their drastically reduced commutes will instead mean less vehicle travel and air pollution. This analysis looks at five pollutants. Two — reactive organic gases (ROG) and nitrogen oxides ( $NO_X$ ) — form smog, the brownish haze seen on warm days. Carbon monoxide (CO) com-

SAME GROWH STRUCT & REGIONAL LINAMLEY POSTPRINT PROJECT

cousin, carbon dioxide (CO2), a "greenhouse gas," contributes to global warming. Finally, particulate matter (PM10) can make breathing difficult, particularly for asthmatics and others with promises the human circulatory system, while it is thought that its respiratory ailments. Because modern cars pollute so much less than their predecessors and because gasoline is becoming cleaner as well, Bay Area smog levels have been steadily decreasing since the 1970s. In fact, if the region develops according to current trends, by 2020 ROG,  $\mathrm{NO}_{\mathrm{X}}$ and CO levels are expected to be 25 percent, 55 percent, and 35 cle use will do that. And, reduced dependence on the auto will percent of 1998 levels, respectively. But cleaner vehicles and fuels won't significantly reduce CO2 and PM10 — only reducing vehiachieve even further reductions in ROG, NO<sub>X</sub> and CO beyond what is currently projected.

			1		
CHARACTERISTIC	1998	2020 Baye Cane	Alt. 1	Att. 2	312.3
Reactive Organic Gases (ROG)	178	42	40	42	43
Nitrogen Oxides (NO <sub>X</sub> )	251	137	134	137	141
Carbon Nonoxide (CO)	2,044	111	694	715	734
Carbon Dioxide (CO2)	473	609	580	665	616
Particulates (PM10)	19	84	80	82	10

The air quality picture looks brightest under Alternatives 1 and 2. Despite housing two-thirds more people than the Base Case, Alternatives 1 and 2 would result in slightly lower levels of all pollutants compared to the Base Case. Alternative 3 is expected to produce a slightly higher level of pollutants.

#### Water

Water is a valuable resource in the Bay Area. We import much of our water from the northern reaches of California and the Sierra, and past drought years have required significant curtailment in neers are constantly searching for new water sources for the water consumption to make ends meet. Water utilities and engiregion, but we still need to conserve water as much as possible.

Smart growth can't change the fact that each new job or household requires water to serve it. In fact, given the interconnected nature of the state's water system, new development just about anywhere in California affects the same overall water supply.

and building types that minimize water use. In the Bay Area, new development in cooler areas near the coast and the Bay requires less water than new development in hotter inland areas. And new But smart growth can provide for new development in locations multifamily units use less water than new single-family units. since they are smaller and have less landscaping.

uses an average of 300 gallons of water per day. This consumption Under current conditions in the Bay Area, each residential unit rate is likely to continue for new development under the Base Case; it might even rise since new Base Case development is projected to be primarily in hotter inland areas and to be composed of single-family homes.

average water consumption in new units at 250 gallons per day, a 17 percent reduction. Alternative 3, with its somewhat greater ment in inner parts of the Bay Area and in multifamily units, the Since the smart growth alternatives would place more developalternatives would all lower the average rate of water consumption. age per household water consumption, at 220 gallons per day, for a reduction of 27 percent compared to existing conditions. Alternative 2 also would result in reductions in consumption, with reliance on new development in inland areas and single-family homes, would result in average water consumption in new units of New development under Alternative I would have the lowest aver-280 gallons per day, a 7 percent reduction below today's rates.

in slightly lower levels ALTERNATIVES 1 & 2 compared to the BASE CASE two-thirds more of all pollutants people than the would result Despite housing Base Case,

**KEY TO ALTERNATIVES** 

- Alternative 1 **Central Cities** .
- Alternative 2 8
- Network of Neighborhoods
- -
- Alternative 3
- Smarter Suburbs

## TRANSPORTATION

- 66 Messages from Round One
- Emphasize mass transit over automobiles.
- We need more alternatives to the private car. More public transit, bike and pedestrian facilities, would help.
- I'd like to see more apartments near BART and bus stops.
- Let's consider requiring communities to plan for adequate densities before they get rail extensions.
- Wouldn't it make sense to replace boarded-up buildings along transit lines with new homes?

By identifying APPROPRIATE places for new, compact development near transit, where many SHORT TRIPS CAN bc made on foot and LONGER ones by transit, citizens of any of the smart growth alternative futures WOULD TRAVEL LESS than they would in the Base Case.

Much of the Bay Area's developed area, like many western U.S. metropolitan regions, grew in the postwar era of the automobile, where housing, shops and offices are segregated from each other, thus requiring most people to drive a car to travel from place to place. A number of changes in the intervening half-century have spurred many Bay Area residents to question this checkerboard pattern of development. Probably the most compelling is that the thoroughfares, boulevards and local roads that link these singleuse districts are now packed with cars, with more on the horizon as each new development is approved. Widening streets to make room for more cars can work for awhile, but these "improvements" make crossing on foot or by bike difficult and unpleasant. Round One workshop participants in all nine counties understood this transportation/land-use connection, and their smart growth alternatives bring together shops, offices and housing in mixed-income neighborhoods, often centered around a transit station. They dreamed of a Bay Area where walking to the store is possible, where taking nearby transit is the easiest way to get to work, where driving is an option, but not the only option.

Some Round One workshop participants were dubiouts: "Our roads are already too crowded. How could life be better with more people?" they asked. But by identifying appropriate places for new, compact development near transit, where many short trips can be made on foot and longer ones by transit, the Metropolitan Transportation Commission concludes that, on average, citizens of any of the smart growth alternative futures would travel less than they would in the Base Case.

## Alternatives to the Automobile

What is it about the alternatives that could allow people to travel less? Today, less than one quarter of the region's residences and just 40 percent of its jobs are within convenient walking distance of a rail station or bus stop with frequent service. In all three smart growth alternatives, many more people would live and work in close proximity to public transit than in the Base Case, though to varying degrees. As shown in the bar chart on the facing page. Alternative 1 leads the way, with Alternative 2 close behind. But, how many of the hundreds of thousands of additional people living and working close to transit stations would use them? Twice as many trips in Alternative 1 would be on trains and buses as compared to today, according to MTC. Although Alternative 2 does not manage to lure quite as many 2020 Bay Area residents out of their cars, if the yet-unfunded rail extensions that form the basis of Alternatives 2 and 3 are built. Alternative 2 leaps to first place! Carpooling constitutes about 14 percent of work trips and stays about the same from alternative to alternative. When we add walking and bicycling to the equation, the analysis shows that the share of work trips made by non-auto modes is expected to grow from 13 percent to 14 percent under the Base Case and Alternative 3. The share of work trips made by modes other than the auto would grow to about 16 percent in Alternative 2 and to 20 percent in Alternative 1. If we look at all trips, under the Base Case and Alternative 3, 18 percent would be on an alternative mode (up from 16 percent in J998), while the development patauto share and Alternative 1, 22 percent.



VTA light rail

ABIL CROWN STATES REGENEL BASELIN FOOTBUND PROJECT

		2020			
	1998	Base Case	Att. 1	Alt. 2	AR 3
Work Trips					
Percent Transit	%6	10%	15%	1441	11%
Percent Walk, Bike, Transit	13%	14%	20%	16%	14%
Total Trips					
Percent Transit	6%9	6%	%6	*/sL	%9
Percent Walk, Bike, Transit	16%	18%	22%	19%	18%
Zera-Auto Househelds	%6	8%	11%	10%	°/*6
Total Yehide Miles Traveled (millions of miles)	128	175	167	11	176

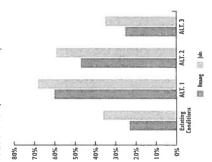
### Auto Ownership

Would all of these new transit riders, pedestrians and bicyclists mean that households of the alternative future would own fewer cars? Typically, there are strong correlations between household income and auto ownership and the amount of travel by automobile. (Note: There are some important Bay Area exceptions to this rule of thumb in some of today's densest and most upscale neighborhoods where many households rely on public transit, despite being able to afford owning and operating a car.) Since the smart growth alternatives call for a tremendouts amount of new housing affordable to very-low-income and low-income families, it follows that more Bay Area residents would be riding public transit as a result of lower income alone. However, as discussed in the upcoming Housing Affordability section, one of the most challenging aspects of any of the smart growth alternatives will be reaching the affordability goals set by Round One workshop participants. Therefore, in order to isolate the effect of the land-use alternatives on public transit ridership, this analysis assumes similar average regionwide household income. Using this assumption, MTC expects a significant increase in the proportion of households with zero automobiles under Alternative 1, in contrast to a Base Case projection that the number and share of these households will decrease. This presumably follows from the large numbers of new residents who would be living in core areas that are well served by public transit.

### Congestion

The analysis above suggests that, despite housing many more people than the Base Case, due to the patterns of growth envisioned in the three alternatives, more and a greater share of Bay Area residents in 2020 would be taking transit, walking and bicycling. But what would all of the additional people accommodated by the smart growth alternatives mean for traffic on the region's roadways? Interestingly, Round One workshop participants, total miles of travel — both for work trips and total trips — would not be quite as high under any of the alternatives as in the Base Case. Furthermore, average commute speeds would be expected to be about the same as in the Base Case, indicating that peak hour traffic would not be any worse. The differences between the three alternatives are smaller than the statistical error expected in a regionwide analysis of this nature.





## KEY TO ALTERNATIVES

- m Alternative | Central Cities
- a Alternative 2
- Network of Neighborhoods
  - m Alternative 3
- Smarter Suburbs

WILL STARTER REGIONAL LIVABILITY FOODPRINT PROJECT

### HOUSING

Messages from Round One 3

- It's about time we built enough housing for the Bay Area's workforce.
- I'd like to live upstairs from a cafe, where I could walk to the store.
- This region needs more infill housing projects.
- What about reusing vacant buildings for housing?
- Let's find new ways to build housing affordable to people
- of all incomes.
- Don't forget about existing residents!
- Why not try to provide jobs near housing?

8

### Affordable Housing

The Need

analysis areas

LARGEST PERCENTAGE of

would place the Alternative 1

households in

with good jobs/housing

MATCH for

NEW GROWTH, while

providing almost as

In the decade from 1988 to 1998, the Bay Area produced 251,000 housing units. This was not enough to meet the demands of the ing outside the Bay Area. The situation was even bleaker for veryow- and low-income families: During the same period, only about region's workforce, forcing thousands of households to seek hous-100,000 of the units produced were affordable for very-low-, lowand moderate-income families. To meet market demands, an additional 90,000 units needed to be affordable to this segment of the population.

> much total balance as Alternative 3.

The under-supply of housing and the lack of affordable housing have driven housing prices up for everyone. Middle-income households outbid lower income households for modest units, and wealthier households outbid everyone else for housing origi-nally built for the middle class. The crisis is particularly severe for very low- and low-income residents.

An increase in the total cial for improving overall of housing developers growth process is vital to addressing how to increase supply of housing is cruhousing affordability in the Bay Area. Involvement profit) in this smart the production of housing increased supply, housing low-income households (both for-profit and nonand thus overall affordability. However, even with will likely remain unaffordable for low- and very governmental assistance and subsidies. without

\$48,000 \$50,300 \$50,800

\$41,800

Emergency Dispatcher Elementary School Teacher

(50% - 80% of median)

\$56,100 \$63,600 \$63,800

\$55,200

**Computer Support Specialist** 

Landscape Architect **Police Patrol Officer** 

**Registered Nurse** 

180% - 100% of median

foderate Incom Fire Fighter Loan Officer

\$23,500

**Delivery Truck Driver** 

\$20,000

lless than 50% of mee

Child Care Worker Retall Salesperson Medical Assistant

\$64,200

PERSON MEDIAN HOUSEHOLD INCOME (I VAGE EARNER) WAGES FOR REPRESENTATIVE OCCUPATIONS IN THE BAY AREA

\$27,900

ves
nati
lter
ae A
F

silaries are calculated as the simple mean of the annual wages the five Bay Area PMSAs ieurce, HUD 2001 fncome Limits, CA EDD 1998 OES Escalated to 28011; BAE

## Most Round One work-

shop participants agreed that any smart growth alternative for the for all income levels. All three alternatives represent a significant increase in total housing production, particularly new affordable housing construction, when compared with the Base Case. Each alternative calls for about 270,000 more housing units than the Bay Area should include an adequate supply of housing affordable Base Case's 400,000 units, and each would especially improve affordability for low- and very-low-income households.

growth alternatives because of the overwhelming agreement of higher, 40 percent to 60 percent, in the North Bay counties of The proportion of new housing affordable to very low- and lowincome households in each county is similar in all three smart Round One workshop participants in each county. In Alameda, San Francisco, San Mateo, Solano and Santa Clara counties, Round One participants called for 30 percent to 40 percent of new housing to be affordable to these income levels. The target was even Marin, Napa and Sonoma. And Contra Costa County Round One

12

SHART GROWTH STRATESS REGIONAL EVABUTY FOOTBRINS PROJECT

	Base Case	Alt. 1	A31.2	Alt. 3
Income Level	Units	Units	Units	Units
Yery Low	33,400	178,000	179,300	178,700
M	33,600	105,600	109,000	111,700
foderate	87,200	161,000	164,200	163,100
those Hoderate	247,300	223,500	220,300	223,300
Total Housing	401,500	668,100	672,800	676,700

workshop participants set a particularly ambitious goal, specifying that two-thirds of new housing should be affordable to very lowand low-income households.

outpace the current trends in affordable housing production. To use and compact development. In addition, special incentives income housing envisioned by Round One participants. See pages The affordable housing foreseen in all three alternatives would far ulatory changes are needed to counteract existing forces on local governments and developers that discourage residential, mixedwould be needed to provide the level of very-low- and low-24-26 for a discussion of some of the regulatory changes and fismeet the goals of workshop participants, new incentives and regcal incentives identified at the fall workshops.

### obs and Housing

# The Balance Between Jobs and Housing

Some planners say that the solution to the Bay Area's chronic and worsening morning and evening commute traffic is a better balance of jobs and housing in a given area. If all our communities had balanced numbers of jobs and housing then, they say, enough people could live near their jobs to put a dent in congestion.

is centered on an existing job center and extends to include housing within about a half-hour commute or less. An analysis area is To assess the relationship between jobs and housing, this analysis looks at 15 overlapping commute areas (see map on page 14). Each considered to have an acceptable balance if there are a sufficient

number of jobs within that area for at least 85 percent of the households.

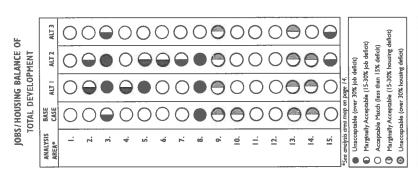
Because jobs/housing issues are complicated, two different types of area, including existing and future growth. Second is the relationjobs/housing relationships are assessed. First is the relationship between the total of future jobs and housing units in each analysis ship between new jobs and housing units.

### A Look at the Totals

Some people feel that smart growth planning efforts like the Smart Growth/Footprint Project must improve the ultimate total balance nities with overall jobs/housing balances, they say, we will perpetof jobs and housing in each community. Unless we create commuuate current conditions in which many Bay Area residents have to drive long distances to work. Despite its dispersed development patterns, the Current Trends these areas and a continuing imbalance in San Francisco and idents --- in 2020. This would occur because the Base Case contains it. This job growth is forecast to occur in today's peripheral housing-rich areas, leading to an improved jobs/housing balance in Base Case would result in a total balance of jobs and housing in nine of the 15 analysis areas — accounting for 57 percent of Bay Area resstrong job growth without companion housing growth to support Silicon Valley.

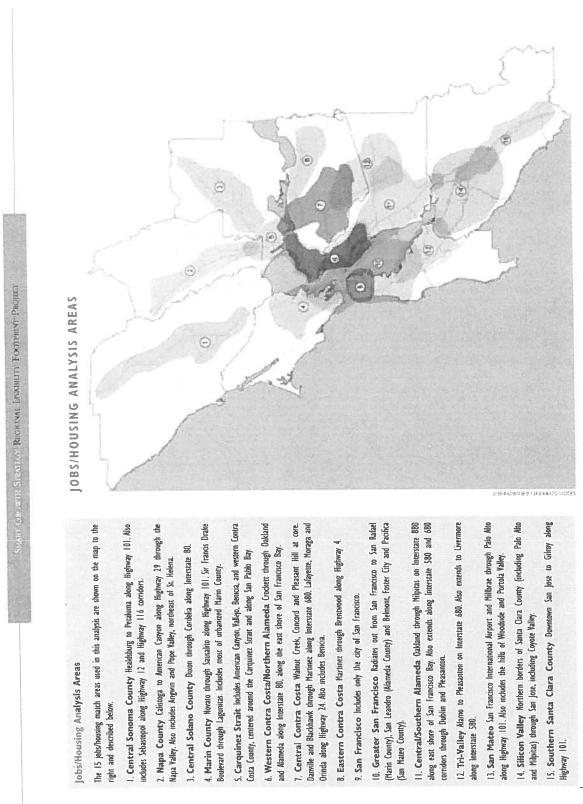
jobs in outlying residential areas. A total of 11 of the 15 analysis areas capturing 85 percent of the Bay Area's population would be Alternative 3 would result in the best regional total jobs/housing balance of the three alternatives, since it would place many new balanced under this alternative.

Alternative 1 also would result in a strong total jobs/housing balance. Although a total of only seven of the 15 analysis areas would population. Almost as many people would be living in balanced The highly-focused development patterns envisioned in be balanced, these areas would capture 71 percent of the Bay Area's communities under Alternative 1 as in Alternative 3.



**KEY TO ALTERNATIVES** 

- Alternative | Central Cities 12
  - Alternative 2 -
- Network of Neighborhoods 135
  - Alternative 3
  - Smarter Suburbs



SAME CROWN STRAFED REGIONAL LIVABILITY POSTPRINT PROJECT

improve the Bay Area's total jobs/housing balance. Under Alternative 2, five analysis areas capturing 50 percent of total One of Alternative 2's specific intentions is to focus on creating new, balanced mixed-use communities. As discussed below, Alternative 2 would therefore result in fairly balanced new development, but it would not do as much as the other alternatives to households would be balanced.

## Focusing on New Growth

suggest that it is more important to try to balance job and housing Some people believe that striving for a total balance of jobs and housing is neither realistic nor advisable. Given that current Bay Area residents already have their jobs and homes, these people growth in new development only. In this view, striving for betterbalanced new development is the key to smart growth.

makes it possible to add another dimension to the analysis: of new housing available in each area compares to the pay scales of new jobs in the same area. Such an analysis is not meaningful when assessing total future jobs and housing supply, since the Bay whether the incomes from new local jobs would be high enough Looking at the relationship between new jobs and housing also jobs/housing match. An analysis of match considers how the cost Area's current housing prices preclude a match between housing costs and incomes in most markets. But it is possible to see to allow new workers and their families to afford new nearby housing. The results of this analysis of the jobs/housing match for new development are shown below.

Trends Base Case would lead to a match of housing cost and local incomes for new development in just one analysis area, accounting for just 9 percent of the total housing growth projected under the Under current trends, there would be a very poor match between future jobs and housing. Development according to the Current Base Case.

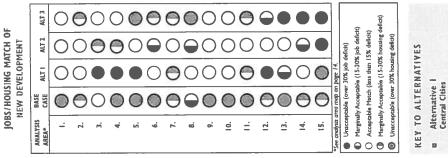
Seven analysis areas would show an acceptable jobs/housing match including the Bay Area's most populated communities. Seventy-six percent of all new workers would be able to live within 30 minutes of their jobs in new housing they could afford under Under Alternative 1, the picture would improve dramatically. Alternative 1.

these areas are less populous than those with acceptable matches in Alternative 2 would result in an acceptable match for new jobs and housing in even more analysis areas - nine of the 15. However, Alternative 1, resulting in a total of 64 percent of all new households in the region in areas with a match between housing cost and job income.

their homes. These four areas would account for 29 percent of all would be able to find housing they can afford within 30 minutes of In Alternative 3, new workers living in five of the 15 analysis areas new workers in the region.

### The Big Picture

continues to grow as it has in the past. All three of the alternatives offer significant improvements over the Base Case in terms of the ments in each case. The pattern of growth envisioned in Alternative 3 would provide the strongest balance of total jobs and housing in the future. Alternative 2 would provide a good match of would place the largest percentage of households in analysis areas with a good jobs/housing match for new growth, while providing The dream of a short commute will remain just that if the Bay Area region's jobs/housing balance, with different types of improvenew jobs and housing in the most analysis areas. Alternative 1 almost as much total balance as Alternative 3.



- Alternative 2
- **Network of Neighborhoods** 22
  - Alternative 3 -
  - Smarter Suburbs

SALER CROWTH STRATED REGIONAL ENGINEE FOOTBRINE PROJECT

# SOCIAL AND ECONOMIC EQUITY

365 Messages from Round One

- Our poorest neighborhoods must benefit from smart
- growth too. We must be careful that new growth does not displace
- existing residents and businesses.
  - If well-planned, rail and bus improvements can benefit the transit-dependent most of all.

MUCH LESS

Social equity within the smart growth framework ensures that people of all income levels have access to good schools and various types of employment. It means that low-income residents in particular benefit from new investment in their communities and have access to affordable housing and reliable transportation. Social equity gives all individuals access to economic opportunities, mitigates displacement by rapidly increasing housing costs, and promotes active engagement and participation by all residents in community planning efforts.

low-income communities

would occur in

GROWTH

in ALTERNATIVE 3 and the BASE CASE, which

could create **less** 

displacement

Under any of the alternatives (including the Base Case), the Bay Area's population and employment growth will present challenges and opportunities for lower income communities, and for making housing, services and employment available to residents of impoverished neighborhoods throughout the region. Smart growth strategies have the potential to reduce some of the current inequities in these areas. But if not managed well, smart growth also could trigger changes that disrupt communities and lead to increased displacement, economic isolation and segregation.

SIGNIFICANTLY FEWER

**OPPORTUNITIES** 

for economic revitalization.

However, these alternative

pressure.

futures also offer

To assess these issues, five diverse low-income neighborhoods were selected from among the Bay Area's most impoverished communities for closer analysis of the consequences of growth. Urban, suburban and semi-rural locations, with varying levels of nearby employment and access to transit, are represented by

Central East Oakland, North Richmond, East San Jose, Boyes Hot Springs and San Francisco's Bayview/Hunters Point district.

# **Growth Patterns in the Case Study Communities**

The population and job growth rates of the five communities show clear differences between the Base Case and the three smart growth alternatives. Differences in household growth are wider than the changes in the number of jobs in these communities. Under the Current Trends Base Case, there would be relatively little growth in the five case study communities and in impoverished communities in the region in general. Under the Base Case, the number of households in the case study communities would grow by just 10 percent, and employment by just 18 percent, compared to household growth of 16 percent and employment growth of 27 percent for the region as a whole.

8





Under Alternative 1, the Central Cities alternative, significantly more housing and jobs would be added in the region's procest neighborhoods — as represented by the five case study areas — than in either of the other alternatives or the Base Case. This makes sense, given the concentration of poor neighborhoods in the region's central cities.

The level of housing in these areas also rises guite a bit under Alternative 2, though very few jobs are added. Since three of the case study communities are well-served by public transit, growth in these neighborhoods as a group is expected in this alternative.

Growth raises concerns about PRESERVING the <b>character</b> and	affordability of communities, and ensuring that reinvestment benefits CURRENT	RESIDENTS.		KEY TO ALTERNATIVES Atternative 1 Central Cities Atternative 2 Network of Neighborhoods Atternative 3 Smarter Suburbs
Social Equity Implications of the Alternatives The sizable increases in household and job growth foreseen for the case study communities in Alternatives 1 and 2 could provide an opportunity for creating healthy, diverse, mixed-income commu- nities with improved access to quality affordable housing for low- income residents. Positive changes in these neighborhoods, howev- er, would occur only if necessary steps are taken to ensure equitable development.	Alternative 3 and the Base Case, on the other hand, would result in relatively little growth in housing or jobs in the case study communities when compared to the region as a whole. Under these alternatives, low-income neighborhoods would be likely to continue to suffer from under-employment, disinvestment, overcrowding and poor services.	Jobs/Housing Match One possible benefit of smart growth in the region's poorest neigh- borhoods is new jobs for residents of these communities. However, this can only occur if there is a match between incomes from these jobs and the cost of nearby housing.	In the Current Trends Base Case, the need for housing that is affordable to very low- and low-income households would far exceed the supply. The three alternatives would all perform better than the Base Case in providing much needed affordable housing in impoverished communities.	Alternative 2 would perform best in its match between affordable housing need and supply in the case study communities. In four of the five jobs/housing analysis areas covering the case study com- munities, Alternative 2 would show no affordability gap for very low-income households. For the low-income population, two of the case study communities would have a slight affordability gap, but would still show an improvement over the other alternatives or the Base Case, while there would be no gap in the other three com- munities. Overall, Alternative 2 goes further to meet the housing needs of lower income residents than do the other alternatives or the Current Trends Base Case.
Housing growth in the region's most impoverished communities is expected to be slightly higher under Alternative 3 than the Base Case, and job growth slightly less, consistent with this alternative's emphasis on the region's relatively affluent edges.	Boyes He is Springs	Bayteen-Hunters Philit %: Central Express-Hunters Philit %: East Okland	LOCATIONS OF FIVE CASE STUDY COMMUNITIES	But looking at the five case study communities together masks some interesting differences between these neighborhoods. Increases in housing supply would vary across the five communi- ties, being generally greater in all three alternatives in Bayview/ Hunters Point, Central East Oakland and North Richmond, with lower rates of increase in East San Jose and Boyes Hot Springs. Central East Oakland and North Richmond, with lower rates of increase in East San Jose and Boyes Hot Springs. Usubstantial amounts of industrial and commercial land — general- ly would experience the greatest employment growth under each of the alternatives.

SALAT CHONTH STRATE'S READING DVARUTY FOOTHANT PROPER



hildren living in a murter suburb

In Alternative 1, the gap between affordable housing need and production would be reduced significantly relative to the Base Case. North Richmond and Central East Oakland would show no housing deficit for very low- and low-income families, but there would be significant deficits in the other three case study communities. Like Alternative 1, Alternative 3 would show an improvement in affordable housing match over the Base Case, but would still result in affordable housing deficits in four of the five case study communities.

### Job Skill Level

More jobs in the region's impoverialed communities will not help improve standards of living, even if wages are high enough to cover local housing costs, unless residents have needed skills. The Bay Area economy has a strong focus on the information-based "new economy." Over recent decades, there has been a decline in traditional high-paying manufacturing jobs and a proliferation of both highand low-wage service sector employment. In the next 20 years, most jobs commanding incomes sufficient to raise a family above the poverty level will continue to require high levels of education and job skills, regardless of the pattern in which growth occurs. The majority of adult residents in the five case study communities have education levels well below the regional average, which puts local residents at a disadvantage in competing for new high-skill, white collar jobs. Thus local workers may not qualify for new jobs in their areas, even under Alternatives 1 and 2, which call for large amounts of job growth in impoverished areas. Regardless of which alternative is implemented, aggressive job training and economic development programs would be needed to help ensure that job growth benefits existing low-income populations.

## **Commercial Services**

The five case study communities have far fewer retail establishments than their demographics would suggest they can support. In four of the five case study communities, this lack of retail stores means that more money than necessary is leaving these neighborhoods, residents need to travel long distances to meet their basic shopping needs, and few local retail jobs and businesses are creat-

ed as a result of residents' spending. Even in impoverished communities that are well-served by public transit, it is difficult to carry groceries, take children to childcare and run other errands on the bus or train. There is already ample purchasing power in the current resident population for at least one more supermarket and several clothing stores in each of the four largest case study communities. Retailers are not locating in these communities because they do not see them as profitable. Even Boyes Hot Springs, which has a nuch smaller population than the other case study communities, appears to have the potential for a convenience store and a clothing store. The growth called for in Alternatives 1 and 2 would further strengthen the ability of low-income communities to support services by increasing residential densities, boosting the number of nearby workers, and expanding the proportion of relatively higher income residents in these areas. All three factors — density, employees and income-mix employees — would contribute to a stronger market for many goods and services, which in turn would attract reailers. Under Alternative 3 and the Base Case, existing conditions and trends in impoverished neighborhoods would change much less, creating less impetus for new retail development.

### Overcrowding

The tight, expensive Bay Area housing market has led to serious overcrowding in many low-income neighborhoods, including all of the case study communities except North Richmond. High rents frequently force two or more families to share housing units designed for a single family. Significant new housing construction in low-income communities like that foreseen under Alternatives 1 and 2 could help to address this issue if new units were made available at affordable prices to people already living in overcrowded units in the neighborhoods. Alternative 3 and the Base Case have less capacity to address overcrowding, since they include less housing SHARE CROWTH STRATEN REGIONAL LIVABILITY RECORDENT PROPERT

both affordability and priority in assigning units to existing development in currently crowded areas. However, even Alternatives 1 and 2 would need to include programs to ensure local residents if they are to help address overcrowding.

#### Access

region is another key issue in planning for equity. Several of the five case study communities, even those that have major mass transit ing blue-collar and service jobs for which they are qualified. In the absence of adequate transit, the high cost of car ownership for The physical access of residents to employment and the larger facilities or routes within them, are currently lacking in adequate transit service, especially for reverse commutes and during off-peak hours. These gaps can prevent lower income residents from reachower income families can put home ownership, savings for education, and other types of asset accumulation further out of reach.

by making transit more viable. With increases in the number of ice in these areas. However, a concerted effort would need to be Without additional transit service, existing impoverished communities would remain just as isolated, potentially with even more Alternatives 1 and 2, which would increase residential densities in many impoverished communities, would help to address this issue potential riders, transit providers might be more likely to add servmade to ensure that additional transit really would be provided. underserved residents.

# Displacement and Neighborhood Change

As noted above, substantial growth such as that proposed in growth is not well managed, it also could lead to displacement and Alternatives 1 and 2 could lead to important new opportunities in housing, jobs/housing match, retail services and transit. But if instability.

Lower income renters and business owners living and working in neighborhoods with relatively affordable building stock and access to downtown districts are the most likely to experience displacement as higher income persons and businesses move in.

growth would occur in low-income communities in Alternative 3 Residents and businesses in impoverished communities would be at risk of displacement under the significant growth rates of Alternatives 1 and 2. Existing low-income neighborhoods could become increasingly attractive to higher-income residents and developers, thereby putting pressure on existing lower income residents and business people to move to new locations. Much less However, these alternative futures also offer significantly fewer and the Base Case, which could create less displacement pressure. opportunities for economic revitalization.

## Capitalizing on Change

In order to capitalize on the opportunities for revitalization of discouraging displacement, the growth and change proposed for low-income communities would need to be accompanied by lower income communities inherent in smart growth while also reinvestment and affordability strategies. Here are some of the ways that residents of these communities think these issues might be addressed:

- Training and education could help qualify local residents for new, local jobs.
- New job development in low-income communities could be targeted to current skill levels of local residents.
- Transit-oriented development and improved public transit service (particularly reverse commute and off-peak) could significantly improve access to new and existing jobs and services throughout the region.
- New business opportunities in low-income neighborhoods could be targeted to local firms and residents.
- Affordable housing could be built throughout the region to avoid concentration in impoverished communities.
- Current overcrowded conditions could be addressed by ensuring that existing residents are given priority for new units in a given neighborhood.
- The affordability of existing housing could be maintained through methods such as new financing for long-term subsidies set to expire soon.

such as that proposed in Substantial growth

important NEW COULD LEAD to Alternatives 1 and 2

## **OPPORTUNITIES**

in HOUSING, jobs/housing match, RETAIL SERVICES and transit. But if

LEAD to NOT WELL MANAGED, it also COULD **GROWTH** is

### and instability. displacement

KEY TO ALTERNATIVES

- Alternative | **Central Cities** -
- Alternative 2 Network of Neighborhoods -
  - 12
  - Alternative 3 Smarter Suburbs

Salari Growth Stration' Regional Englighty Footprint Project

# DEVELOPMENT FEASIBILITY

C Messages from Round One

- Who wants to live all cramped together, anyway?
- Folks want housing options as they pass through the stages of life.
- What's keeping developers from building?

Forty-two percent of potential home buyers said they

WOULD BE WILLING TO BUY a higher density,

attached housing unit if it meant

LIVING NEAR THEIR WORK...

Smart growth will not occur easily. Land supply, market forces and local regulations all have the potential to stand in the way of realizing any of the smart growth alternatives. This section estimates how "doable" each alternative might be, and the next lists incentives, regulatory changes and other public policy changes identified by Round One workshop participants that might help to make any smart growth dream a reality.

### Marketability

Two-thirds of the housing built in the 1990s consisted of singlefamily homes, though this trend varied substantially by county. More than 87 percent of new Solano County housing units fit this description, while only half in Santa Clara County and just 10 percent of new housing in San Francisco were single-family homes. Looking at 2020, two-thirds of the housing in the Current Trends Base Case are again projected to be single-family, distributed by county along similar lines as recent history. All three alternatives show far fewer single-family homes than the Base Case. The most dramatic departure from Current Trends is found in Alternative 1, in which just 26 percent of new housing would be single-family. Alternative 2 shows 39 percent and Alternative 3, 54 percent, single-family homes. In Alternatives 1 and 2, much of residential construction would consist of apartments, townhouses, condominiums, lofts and other multifamily

units. In Alternative 3, new single-family units would predominate, but to a lesser extent than under the Base Case. Adding units in these proportions would slightly alter the regional housing stock mix by 2020 to 54 percent single family in Alternative 1. 57 percent single family in Alternative 3.

The higher levels of multifamily units in the three alternatives compared to the Base Case raise some important questions: Would people in the Bay Area really flock to multifamily and attached housing? Or will hordes of Bay Area commuters continue to turn to the Central Valley for a shot at the American dream of the singlefamily home and a big back yard?

8

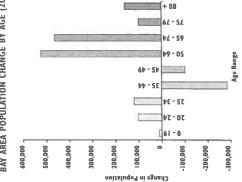
In a 2000 survey, the Home Builders Association (HBA) of Northern California found that 43 percent of shoppers looking for a home in single-family subdivisions were "mainly considering a single-family home." A whopping 61 percent were willing to drive up to 20 miles farther to work if housing were more affordable in outlying areas.<sup>1</sup>

Yet in the same survey, 42 percent of potential home buyers said they would be willing to buy a higher density, attached housing unit if it meant living near their work and it cost no more than a conventional single-family home in an outlying area. This same interest in more compact housing types in exchange for a shorter commute has been found in studies conducted for downtown Oaldand and downtown San Francisco, particularly among young single workers and "empty nesters.<sup>22</sup> On a national level, too, acceptance of smart growth design principles like smaller lots and more compact development seems to be growing. One study of 2,000 buyers of both newly constructed and resale homes noted, "Often what buyers want is NOT what they get. One of the main reasons behind this is that they couldn't find what they wanted in their markets."<sup>3</sup> This study found that homebuyers wanted less sprawl and more "small town," pedestrian-oriented shopping and gathering places.

Changes in demographics also might support the construction of 24-year-old and 55-and-over population groups together are less couples, "empty nesters," and the elderly. These groups are gaining in size in the Bay Area, which is expected to undergo a dramatic change in its age composition in the next 20 years. The 20- to more multifamily units. Households attracted to urban infill lousexpected to increase by over 1.2 million people in the next 20 years. Both have relatively high percentages of people who are interested in small units, senior housing, compact housing near workplaces ing tend be nontraditional households such as young singles, childand urban amenities, and other types of infill housing.

'Since the driving force for the future is the age-based growth of These trends, taken together, suggest that there could be sufficient market demand for the types of housing foreseen in the alternatives. As stated in a national study of future housing demand, households that have largely completed child-rearing, the residential future of cities may well depend on how they appeal to people in life's later stages." 4





### Available Land Supply

term view, and to consider the potential for redevelopment over a Regional Livability Footprint Project encouraged participants to envision future Bay Area development patterns without explicit regard for whether new development would "fit" on current vacant The Round One workshops for the Smart Growth Strategy/ lands. Round One participants were encouraged to take a long-20-year period.

data published by Metroscan. The goal of this "fit" analysis was to determine the number of acres that would need to be redeveloped to accommodate each alternative. The analysis assumed that all needed vacant land in each planning area would be developed and that other land in each planning area would be redeveloped to Following the workshops, analysis of the alternatives compared the proposed development patterns and densities in each planning area to the amount of vacant land, according to county assessor parcel accommodate remaining growth.

Redevelopment sites generally contain underutilized and older buildings. They typically occur along older transportation corridors, in obsolete industrial areas, or on large surplus sites such as For the purposes of this analysis, "redevelopment" means construction on any site that today has development on it. Alameda Naval Air Station and San Francisco's Mission Bay.

Alternative 2 would require redevelopment of 41,000 acres, while Alternative 3 would require redevelopment of 45,000 acres of already-developed land. These acreages reflect partial development of most planning areas: Since each place type includes a variety of building types, many existing structures would be consistent with require almost no redevelopment, since it presumes that most new velopment of 33,000 acres to accommodate the growth envisioned. Round One workshop participants' scenarios. The Base Case would The "fit" analysis found that Alternative 1 would require the redegrowth will take place on currently undeveloped sites.





strale-tamily le w

KEY TO ALTERNATIVES Alternative 1 -

- Alternative 2 **Central Cities** -
- Network of Neighborhoods Alternative 3 -
  - Smarter Suburbs
- 71

The level of redevelopment foreseen in all three alternatives could

be an impediment to their feasibility. The alternatives are expected to be implemented over a 20-year horizon. Over this time frame, they would require redevelopment of between 1,650 and 2,250 acres per year. This level of redevelopment may be feasible given the size of the Bay Area and the fact that redevelopment projects are common throughout the region. However, it might exceed the capacity of the marketplace, and might also face resistance from "NIMBYs" — Not In My Back Yard — who oppose change in their communities. The next section of this report discusses policies and regulatory changes that might help to address these issues.

### Financial Feasibility

carrots and sticks,

Alternative 3

is the **most feasible** of the three, due to its

of DEVELOPMENT

GIVEN today's set

It will take more for smart growth to succeed than interested buyers and enough building sites. In order for developers to build compact, infill and transit-oriented development, it needs to be financially feasible. Both for-profit and nonprofit developers must make their projects "pencil out" if they are to build them. Government subsidies can help in some cases to make ends meet, but in the end, infill development costs (including a reasonable profit) cannot exceed the rent or selling price future residents will be willing and able to pay.

currently undeveloped

sites.

PERIPHERAL,

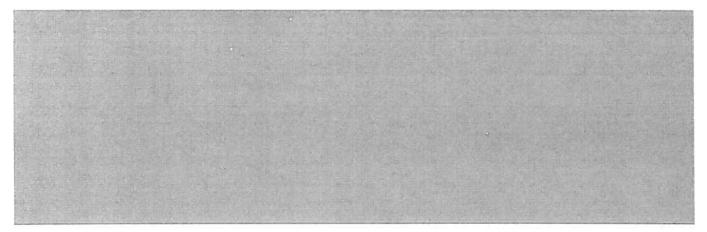
focus on

The financial feasibility of new development in the region will vary substantially depending on a host of factors, including location, tining, national economic trends, local market conditions, land prices, construction costs, local regulations, and the financial requirements of developers and investors. Due to the complexity and variability of each of these factors, this analysis does not look at the financial returns of future development projects. However, the development types used in the alternatives are based on multiple real-world examples from the Bay Area, many of which were recentby constructed, proving that, at least under some conditions, the types of development foreseen in the alternatives can be financially feasible. To further assess financial feasibility across the alternatives, this analysis focused on the broad categories of current land uses in the planning areas designated for new development. Each alternative

envisions using a different mix of currently developed and vacant land to accommodate new growth. Alternative 1 concentrates new growth in relatively expensive, already-developed places such as downtowns and employment centers, creating the biggest financial feasibility challenge among the alternatives. Alternative 2 would be less expensive to develop than Alternative 1, because most development would occur in areas that are less expensive to redevelop, such as residential neighborhoods, shopping areas and large, underutilized sites. Alternative 3 with its strong reliance on development of large, underutilized and greenfields sites throughout the region, would result in more large-scale development projects, from a private developer's perspective. If there is no change in the current mix of rewards and incentives for development, overall, Alternative 1 would be the most difficult of the land-use alternatives to achieve, due to its greater reliance on expensive, already-developed sites. Although growing along the lines of Alternative 2 will require redeveloping more land than in Alternative 1, because it is less intensively developed today, it may be easier to modify. Again, given today's set of development carrots and sticks, Alternative 3 is the most feasible of the three due to its focus on peripheral, currently undeveloped sites.

### HBA News, hune 2000.

- <sup>2</sup> Old Town Spinare Market Feasibility Study (BAE 1997), and Demand for Downtown Housing in South Sun Francisco (BAE 2000).
  <sup>3</sup> Community Preferences: What the Barsers Really Want in Design, Features, and
  - Amenities (American LIVES, Inc., 1999).
- <sup>4</sup> The Implications of Changing U.S. Demographics for Housing Choice and Location in Cirics (Martha Farmsworth Riche for the Brookings Institution, 2001).



# INCENTIVES AND Regulatory Changes

# INCENTIVES AND REGULATORY CHANGES

Working together to create a vision of a more sustainable future is a critical component of the Smart Growth/Footprint Project, but it is just the first step. Our current development pattern is to a great extent influenced by a set of carrots and sticks. Local governments' reliance on sales taxes makes retail development more attractive than new housing. Environmental regulations designed for undeveloped areas sometimes impede more efficient infil development. And some infrastructure funding formulas favor sparsely developed areas. All told, existing incentives and regulations largely dictate our current development patterns. These incentives and disincentives come from our tax system, regulations on land use and the criteria we use to distribute state and federal funds, among other mechanisms. They shape the decisions that localities, private developers and even neighborhoods make. While none of these incentives or regulations are set in stone, changing decades of fiscal and regulatory tradition will require new carrots and sticks.

> component of the Smart Growth Strategy/Regional Livability Footprint

Working together to create

a VISION of a more sustainable future

is a critical

There are many ways that regional agencies and state and federal governments can support local smart growth land-use decisions. Round One public workshop participants supported many of the ideas suggested in the Round One briefing book, and generated a wealth of original ideas. Following is a sampling:

### **Fiscal Reform**

Project,

BUT it is just the

first step.

Local governments are largely dependent on sales tax revenue to support local services, since the property tax rate is capped by the state's Proposition 13. The resulting limits on residential taxation and emphasis on sales taxes lead jurisdictions to compete with one another for retail development, which in turn has created interjurisdictional fiscal inequities and a regionwide bias against new housing construction, particularly affordable housing. Fiscal reform at the state level might help to reverse these trends:

- Return property tax to local governments. During the early 1990s, the state shifted \$3 billion of local property taxes from local governments to the Educational Revenue Augmentation Fund (ERAF), which supports public schools. Shifting this money back to local governments, and restoring state support of public schools, could reduce local governments' reliance on sometimes inappropriate retail development.
- Share tax revenue. Sales and property tax revenues could be shared between communities in a region. This would reduce the fiscal desirability of commercial/industrial development relative to housing, and help mitigate the current fiscal inequities between communities.
- Split property tax rate for land vs. improvements. By taxing vacant land at a higher rate than the structures built on that land, property owners might be encouraged to develop their property more intensively.

### Financial Incentives

Sometimes financial rewards for certain types of development can help local governments, developers and others overcome biases that favor automobile-oriented, single-use, market-rate development. Possibilities include:

- **Reward school districts** for developing joint community facilities in connection with new neighborhood schools. Reinvigorating a sense of community is an important element in the creation of more livable neighborhoods. Schools, both new and newly renovated, that function also as community centers, give vitality to neighborhoods after school hours while providing needed gathering places.
- Provide funds to encourage development of walkable communities. Local governments and developers need financial incentives to build mixed-use, compact and transit-oriented development because these new patterns can be more expensive to build than their single-use, spread-out, automobileoriented counterparts.

- Create "smart growth zones" where state and regional investment could be targeted. This arrangement would focus public money on creating or redeveloping communities where residents, workers, shoppers and others have transportation options and opportunities for social interaction, all of which are important components of smart growth.
- Reprioritize transportation funding to bolster appropriate development around rail and bus nodes and improve the frequency and reliability of public transit. Programs that could be broadened or augmented include MTC's Transportation for Livable Communities and Housing Incentive programs and other state and federal transportation funding programs.

### Regulatory Changes

State regulations also could be amended to encourage smart growth development patterns. Examples include:

- Create limited exemptions to the California Environmental Quality Act (CEQA). Although transit-oriented and mixed-use projects can increase local congestion by attracting more people and cars to an area, such projects can allow residents to run more errands in the surrounding neighborhood on foot. Although some Round One workshop participants were nervous about discussing any changes to CEQA, others proposed exempting these projects from CEQA altogether or only from currently required traffic analysis. A similar exemption already exists for low-income housing projects of 100 units or less.
- **Provide construction defect litigation relief.** Housing developers often cite the prevalence of construction defect lawsuits as a reason that it is difficult to build condominiums. The state could adopt regulations that limit the potential for such lawsuits, while protecting consumers with warranties to ensure quality housing.
- Create and enforce living wage standard. Smart communities are diverse communities. By setting a minimum wage that can support a full-time worker, the state would be helping to foster stable communities.

# NEW AND PROPOSED INCENTIVES

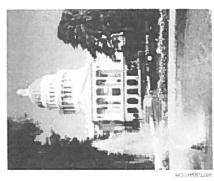
Here are some ideas for incentives and regulatory changes that have recently been proposed or developed:

# Community Capital Investment Initiative

In partnership with the Bay Area's poorest communities, high priority Bay Area Alliance project to attract private investment and smart growth to these neighborhoods. CCIIBAA@BayAreaAlliance.org Speaker's Commission on Regionalism

Blue ribbon committee of elected, business, environmental, labor and equity leaders from throughout California. Recently released report identifies state policy changes needed to allow regions to address economic competitiveness, persistent poverty, underemployment, traffic congestion. long commutes, unaffordable housing, and loss of open space and habitat. www.regionalism.org The Urban Land Institute (ULI) ULI's California Smart Growth Initiative is guided by business, development, environmental, social justice, civic and local government leaders from throughout the state, convened to identify specific priority areas and actions that the state of California should take to promote smart growth practices. Recommendations scheduled to be released this summer. www.smartgrowthcalifornia.uli.org

Transportation for Livable Communities The Metropolitan Transportation Commission is tripling its Transportation for Livable Communities program, from \$9 million to \$27 million annually. This program funds both capital and planning projects and a separate Housing Incentive Program. www.mtc.ca.gov



California state Capitol, Sacramento

To change decades of fiscal and regulatory tradition will require new CARROTS and STICKS.

#### INNOVATIVE BAY AREA AFFORDABLE HOUSING PROGRAMS

Already, local Bay Area communities have created programs to spur affordable housing development. Here are some examples: Farm Worker Housing. Smart Growth Caurus Chair and Assemblymember Pat

Caucus Chair and Assemblymember Pat Wiggins and the Napa Valley Vintners Association have sponsored a bill that would allow Napa County to levy a tax on planted vineyards to provide housing for their employees. Vineyard property owners who provide housing for their workers are exempted from the tax. **Bonds.** In 1996, San Franciscans passed a \$100 million general obligation bond that is being used to create 2.400 units of housing. Current plans call for a \$200 million bond measure on the November 2002 ballot. Redevelopment Area Commitment. Oakland, San Francisco, San Jose and Santa Clara are leading the way in raising the portion of their redevelopment funds dedicated to affordable housing. Location Efficient Mortgages (LEMs). These are special mortgages for housing in convenient neighborhoods and close to public transit where data shows members of average households drive less and spend less on transportation. LEMs allow households to qualify for larger mortgages by taking reduced automobile expenses into consideration.

### THE UNIQUE CHALLENGE OF AFFORDABLE HOUSING

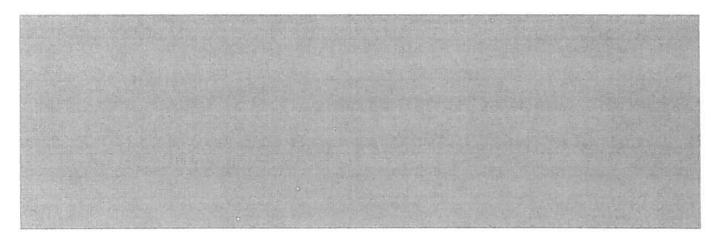
One of the largest challenges to implementing any of the alternatives will be creating the vast increases in affordable housing throughout the Bay Area that Round One workshop participants desire. Constructing a wide range of housing in every community is crucial for achieving the economic diversity needed to maintain a healthy region. The Bay Area needs policies that are intended to provide housing for all segments of the Bay Area's workforce. Additional specific policies are needed to create housing affordable to very low-income households. Communities can intentionally encourage the development of a diversity of housing types — small lot single-family homes, second units (typically built behind existing housing), townhouses and apartments. Some existing policies that limit development to single-family detached houses or establish large minimum lot sizes have contributed to increased housing prices — often beyond the reach of lower income and even middle-income households, and should be avoided.

Local governments also can work with nonprofit and for-profit developers to create permanently affordable housing. Many such developers are active in the Bay Area. Following are policies that local governments have used to encourage or require the development of affordable housing:

- Incentives that encourage the construction of affordable housing include allowing developers to build more densely than they would otherwise be permitted, processing permits more quickly than usual and providing project subsidies.
- Inclusionary zoning requires new housing development to include a certain percentage (usually 10 percent to 20 percent) that is affordable to very low-, low- and moderateincome residents. Although some feel that such policies unfairly burden buyers of market-rate units in the same development, East Palo Alto, Union City, San Francisco,

Richmond, Danville, Napa, Dublin, Petaluma, Santa Rosa and many cities in Marin have inclusionary zoning.

- Jobs/housing linkage fees require all new job-generating projects to pay a fee toward the development of affordable housing. Although some feel that these fees unfairly penalize businesses producing new jobs, many communities have already adopted them, including Cupertino, Menlo Park, San Francisco, Pleasanton, Livermore and Napa. Some counties' cities are working together to pass countywide fees.
  - Reduced parking requirements for housing in close proximity to public transit can reduce development costs and increase affordability.
- Increased public investment in affordable housing can fill the funding gap that currently prevents the creation of housing affordable to low- and very low-income households.



## THE ALTERNATIVES UP CLOSE

CURRENT HOUSEHOLDS AND JOBS	AND JOBS	This chapter provides detailed descriptions of the I	chapter provides detailed descriptions of the Base Case and the three smart growth alternatives.
County Rouseholds	sdol 2b	Maps of each are on a fold-out poster, attached to the inside back cover of this report.	hed to the inside back cover of this report.
Alameda 514,600 232 000	00 725,800	CURRENT TRENDS BASE CASE	Contra Costa
Marin Losta 230,700			If Contra Costa County grows according to current trends. much of
		The Current Trends Base Case places development in the areas	the new development will occur in the eastern part of the county.
ancisca 3		foreseen by ABAG in its projections for the bay Area. AbAG unit	Not much development would occur in the central part of the coun-
	00 380,400	allocates this growth to census tractis, solute of whited are very target	by while the East County communities of Antioch, Brentwood,
	00 1,077,200	The analysis for the Sinart Growin/Footprint Froject fias future	Pittshurg and Oakley would be expected to grow substantially.
Solano 130,300		distributed the projected growin to more specific locations.	
Sonoma 171,500	00 203,500	Under the Base Case, most new housing growth would occur in	Under the Base Case, Contra Costa County would add the second
Total 2,438,100	0 3,688,600	peripheral areas, particularly in eastern Alameda and Contra	highest number of housing units of any county in the region. Job
		Costa counties, southern Santa Clara County, as well as in Solano and Sonoma counties. Job growth also would occur in these areas, with additional concentrations in existing job centers in San	growth would occur in Brentwood, Oakley, and Pittsburg, and also in North Concord, San Ramon, Richmond and Martinez.
		Francisco and Silicon Valley. The Current Trends Base Case also would result in a shortfall of housing for the nine-county Bay	Significant new residential development would occur in Brentwood, Oakley, Pittsburg and Antioch. North Concord, Bay Point and San
		Area, with attrost oute-turbe of needed new notable out in com- ties outside the Bay Area.	Ramon also would see residential growth, with more minor resi- dential development in Hercules and downtown Walnut Creek.
Under the	der the PACECACE	Alameda	Marin
a i	AUE UAUE,	In the Current Trends Base Case, Alameda County would be sec-	11-dor current trends ABAG does not expect much job or hous-
almost 0	almost one-unira	ond among counties in the region in terms of the number of jobs	ing growth in Marin County over the next 20 years. In fact, the
of needed HOUSING	DUSING	generated, with significant employment-related development throughout the county. Increased job development would occur in Dublin Livermore Pleasanton, Fremont's bay shore, west	county's population is projected to grow at the slowest pace in the region. Most expected growth is expected along the l·lighway 101
the L	the Bay Area.	Oakland, west Berkeley, and Emeryville, at Oakland International Airport, and the Alameda Naval Air Station.	corridor, with residential growth at St. vincents/Superia, Hamilton Air Force Base, north Novato and at the Civic Center area in San Rafael. Limited employment growth would occur at
		The eastern next of the county would be expected to have the	the edge of Novato and San Rafael.
		highest population growth rate, while the western part of the	Napa
		county would see the most growin numericany. The largest increases in housing would occur in Dublin, Pleasanton, Livermore, Emeryville, at the Alameda Naval Air Station, and	Most of Napa County's growth under the Base Case is expected to be in the southern towns of Napa and American Canyon, which are closest to the rest of the Bay Area and to county iob centers.
		Very little new development would be expected in Berkeley, Albany or most of Oakland.	Most of the new jobs in Napa County would be located in the southern areas of the city of Napa, in American Canyon and at the airport industrial area. Residential development would be focused

SWART GROWTH STRATTON REGIONAL LIVABILITY POOLININT PROFES

Suster/Growth Strate v Regional Lyability Footprint Project

### San Francisco

If current trends continue, San Francisco is projected to add 100,000 new jobs over the next 20 years. However, it is still expected to account for a smaller percentage of the region's jobs than it does today, reflecting a trend away from San Francisco as the primary employment center. Increased job densities would occur in the east side of the city: in the Financial District, South of Market, Mission Bay, Hunters Point and along the Third Street corridor, with additional employment development in the Presidio. San Francisco is projected to maintain its position as the region's fourth most populous county and to continue to have the densest residential development in the region. However, there would be relatively little residential growth in the city, with the only significant housing development at Mission Bay.

#### San Mateo

Under current trends, job growth in San Mateo County is expected to occur throughout the county because of its diverse economy. Increased job densities would occur along the bay shore near San Francisco International Airport and in Redwood City, San Mateo, and East Palo Alto. Meanwhile, little housing development is expected in San Mateo County, despite the county's strategic location between the region's two primary employment centers. Significant residential development is foreseen only in Brisbane and Half Moon Bay.

#### Santa Clara

Santa Clara County is forecast to be the regional leader in adding households and second in job growth between 2000 and 2020. Increased employment densities are expected at Moffett Field, Stanford, central San Jose, Milpitas, Sunnyvale. Morgan Hill and Gilroy. Santa Clara County would continue to be the most populous county in the region, and San Jose the most populous city in the Bay Area. Housing development in the county would be dominat-

ed by San Jose, because of its large relative size. New housing areas would be predominantly in the south part of the County, in south San Jose (including Coyote Valley), Morgan Hill and Gilroy. Infill residential development also is expected in the northern part of San Jose.

#### Solano

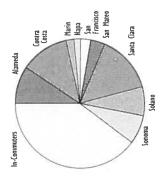
Over the next 20 years, Solano County is expected to have the largest percentage increase in both population and job growth of any county in the Bay Area. Rio Vista is forecast to experience the largest percentage increase in population and households in the region. Increased employment would occur at Mare Island, Travis Air Force Base, north Vacaville, Dixon and Rio Vista. New residential development would occur in Fairfield near Travis Air Force Base and at Green Valley, in north Vacaville, and in Rio Vista. Continued increases in the number of households also are expected in Dixon, the Bay Area city closest to Sacramento.

#### Sonoma

Approximately half of all new jobs expected in the county under current trends would be located in the Santa Rosa area, one of the region's traditional job centers. Rohnert Park, Petaluma and Windsor also would contribute significantly to the county's job growth. Windsor and Cloverdale are expected to experience the highest rates of residential growth in Sonoma County in the Base Case. Significant residential development also would occur at the outskirts of Petaluma, in Rohnert Park, and in Santa Rosa.

County	Change in Housing	Change in Jobs
Atameda	64,200	238,800
Contra Costa	81,900	140,500
Marin	11,900	27,000
Napa	12,500	30,100
San Francisco	15,900	102,800
San Mateo	24,100	71,400
Santa Clara	97,800	231,000
Solano	48,900	81,300
Sonoma	44,300	95,600
Total	401,500	1,018,500

BASE CASE: HOUSING ALLOCATION BY COUNTY



SNARI CHOWTT STATICY REGIONAL LVABILITY FOOTHUNT PROJECT

# ALTERNATIVE 1: CENTRAL CITIES

Bay, and San Jose. There also would be new development along In Alternative 1, most development would occur in the most centrally located parts of the Bay Area: San Francisco, the inner East the Caltrain corridor between San Francisco and San Jose, and in the North Bay's largest communities.

when compared to the other alternatives, while the growth in outlying counties tends to be less than that foreseen in Alternatives 2 This alternative results in the greatest growth in San Francisco,

#### Alameda

Alternative 1

locates most new growth in each COUNTY'S LARGEST

## CITY or cities

and places emphasis on the **REGION'S** 

### San Francisco, Oakland LARGEST CITIES:

and San Jose.

and 3.

In this alternative, development in Alameda County would be focused along the northern bay shore from Albany to San ters are included in downtown Fremont, at existing BART stations in the south and east of the county, and at the Livermore Leandro, with an emphasis on mixed-use and town center/downtown development patterns. Additional mixed-use and town cen-ACE station.

This alternative includes the highest increase in Alameda County densities would occur particularly at the University of California jobs compared to the other alternatives. Increased employment at Berkeley and the Alameda Naval Air Station and in downtown Oakland and San Leandro.

### **Contra Costa**

In Alternative 1, development in Contra Costa County would be the West County communities of El Cerrito and Richmond and the Pleasant Hill. This development would be focused at BART stations and in other adjoining areas. Contra Costa County would see the focused in the county's two historic urban centers of development: Central County communities of Concord, Walnut Creek, and highest increase in both housing units and jobs in this alternative.

County include increased housing in central Richmond and El Specific features of this alternative in western Contra Costa

Richmond shoreline. In the central part of the county, there Cerrito, increased employment at the Richmond marina, a new employment center at Point Molate, intensification of Point Richmond, and mixed-use development along the North Creek, Pleasant Hill and Concord BART stations, some small increases at the Orinda and Lafayette BART stations, and increased residential and employment densities in neighborhoods would be additional downtown development around the Walnut in Concord.

#### Marin

Marin County development in Alternative 1 would be focused in the San Rafael area, with some development in central Novato. In San Rafael, there would be new mixed-use areas in downtown San Rafael, along Third Street, in the Canal area, and along Interstate 580. There would be additional transit-oriented development at the Larkspur Ferry terminal. Novato's downtown also would see new downtown development.

#### Napa

All Napa County development in this alternative would occur in the city of Napa. This alternative includes increased densities idential density and low-density mixed-use development. This alternative results in the smallest increase in housing units and downtown and along Trancas Street, surrounded by increased resobs for Napa County when compared to the other alternatives.

### San Francisco

Alternative 1 shows an intensification of the high-density core in in the central and southeastern parts of the city, at the central waterfront and in Hunters Point. There would be a general increase in residential neighborhood densities in most other areas of the city. This alternative shows the largest job and housing growth for San Francisco when compared to the other two alternatives. downtown San Francisco, with additional mixed-use development

SWART GROWTH STLATEON REGIONAL LIVERILY FOODPRINT PROJECT

#### San Mateo

San Mateo County development in Alternative I would be concentrated around existing BART and Caltrain stations. This development would range in density from medium- to very high-density mixed-use and town center development.

#### Santa Clara

This alternative concentrates development in San Jose and at existing and planned BART, Caltrain and VTA stations, primarily as a mix of uses. Relative to the other two alternatives, this alternative has the smallest increase in housing units and the highest increase in jobs for Santa Clara County. This alternative would include intensification of downtown San Jose, a new town center for downtown Milpitas and transit-oriented development on the planned BART extension from Fremont to San Jose. Moffett Field would become a low-density town center, taking advantage of its proximity to an existing VTA station. Increased residential densities would occur throughout neighborhoods in San Jose.

#### Solano

Solano County development in this alternative would be concentrated in Vallejo. The focus would be on an improved downtown for Vallejo, transit-oriented development near the ferry terminal at the waterfront, and a mixed-use center on Mare Island. New development also would occur at the Solano County Fairgrounds and Marine World, with increased employment and residential infill in the rest of the city. There would be some additional mixed-use and town center areas developed in Benicia's downtown, waterfront and arsenal, in Suisun City near the Capitol Corridor train station and along Texas Street in Fairfield.

This alternative would give Solano County its smallest increase in jobs and housing.

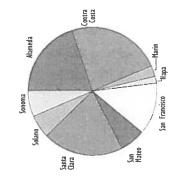
#### Sonoma

In this alterative, most development in Sonoma County would be located in Santa Rosa, with some additional focus on downtown Petaluma. It would include intensification of downtown Santa Rosa and in the area around the county government center, with additional mixed-use development to the south and west of downtown. Petaluma's downtown also would become more dense, and mixed-use neighborhoods would be developed around Petaluma's train station. As in Solano County, this alternative would give Sonoma County its smallest increase in jobs and housing.

## GROWTH IN ALTERNATIVE 1 (2000-2020)

County	Change in Housing	Change in Jobs
Alameda	140,500	247,400
Contra Costa	121,400	167,100
Marin	11,100	8,300
Napa	10,000	12,600
San Francisco	110,900	150,900
San Mateo	39,400	54,200
Santa Clara	152,700	253,300
Solano	47,700	44,500
Sonoma	34,400	51,100
Total	668,100	989,400

ALTERNATIVE 1: HOUSING UNITS BY COUNTY



1			
ł.			
1			
Ł			
L			
	Contraction of the		
	8		
	95		
	r		
	2		
5	281		
H.	濃		
X	i.		
÷.			
2	8		
22	22		
X	21		
ž	市でいたの日		
2	5		
E	8		
113	3		
N.	ŋ		
4	5		
Y	8		
S	99		
E	301		
E			
24			
5			
E			
19	2		
2			
3			
12			
5			
9			
2			
28			
Т			

## ALTERNATIVE 2: NETWORK OF NEIGHBORHOODS

Alternative 2 disperses development around existing developed parts of the Bay Area, focusing on downtowns, walkable neighborhoods and existing and new transit nodes.

#### Alameda

In Alameda County, Alternative 2 includes a mix of development types concentrated in downtowns, around existing, planned and potential BART and ACE stations, and along corridors in both western and eastern areas of the county. Specifically, the following components would be included:

 Mixed-use and town center development in downtowns of Berkeley, Oakland, San Leandro, Hayward, Fremont, Pleasanton and Livermore, and around existing and future BART stations at places like Bayfair and Dublin.

growth in the SAME

generally locates

Alternative 2

CORE AREAS

Alternative 1, but at

LOWER

DENSITIES.

of the region as in

- Mixed-use development would occur along many of the major corridors in the county, such as San Pablo Avenue, Solano Avenue, Telegraph Avenue, Shattuck Avenue, College Avenue, Broadway, MacArthur Boulevard, International Boulevard, Webster Street, Park Avenue, Sunol Boulevard, Santa Rita Road, Stevenson Boulevard, Mowry Avenue, Fremont Boulevard and Osgood Road.
- Medium-density mixed-use development would occur at the former Alameda Naval Air Station and at Golden Gate Fields in Albany.

### Contra Costa

Alternative 2 foresees growth in Contra Costa County concentrated at BART stations, town centers and along major corridors. Increased residential density in neighborhoods throughout the county also would be part of this alternative.

- New mixed-use development at the Richmond Marina and at the Richmond, Orinda, Lafayette, Walnut Creek, Pleasant Hill and North Concord BART stations, and at rail stations in Hercules and Martinez.
- Intensified town center development in Danville and Clayton.

- Mixed-use development along corridors such as San Pablo Avenue, Clayton Road, Treat Boulevard, Parkside Drive, Railroad Avenue, 10th Street, Mt. Diablo Boulevard, Geary Boulevard, Ygnacio Valley Boulevard and Monument Boulevard.
- Increased residential and employment densities would occur around BART stations in El Cerrito, Pittsburg/Bay Point and Concord, and throughout the western and central parts of the county.

#### Marin

Marin County development in Alternative 2 would be more dispersed than in Alternative 1, with medium- and medium-highdensity town centers throughout the county.

- Downtown or town center development in Novato, San Rafael, Larkspur, Mill Valley, Tiburon and Fairfax, at the Civic Center and Larkspur Landing, and at a new node at a new community replacing San Quentin prison.
- Medium-density town center and mixed-use development along corridors such as South Novato Boulevard, Miracle Mile, Miller Avenue, Bridgeway, Tannalpais Drive, Novato Boulevard, Shoreline Drive and Lincoln Avenue.
- Increased residential density along Sir Francis Drake Boulevard.
- Increased densities through infill in some neighborhoods in central Novato and San Rafael.

#### Napa

New development in Napa County under Alternative 2 would occur in all of the cities of the county, primarily in town centers and mixed-use areas in American Canyon, Napa, Yountville, St. Helena, and Calistoga. Residential densities would increase through infill in much of Napa and small parts of Calistoga and Angwin. Medium-high-density employment would be developed at the airport industrial park. SAME GROWTH STRATCOV REGIONAL LIVABILITY FOOTPELMT PROJECT

### San Francisco

Under Alternative 2, San Francisco would experience less growth than in Alternative 1 and that growth would be more dispersed. Increases in development in and around the downtown would cover a smaller area than those foreseen in Alternative 1.

- New mixed-use development along the central waterfront, in the California/Geary corridor, the Mission District, Potrero Hill and Hunters Point, and at City College and the Muni sheds.
- New transit-oriented development around Caltrain stations and at the Balboa Park BART station.
- Town center and mixed-use development along major corridors such as Lombard Street, Van Ness Avenue, Columbus Avenue, Park Presidio Boulevard, 19th Avenue, Iudah Street, Taraval Street, Alemany Boulevard, Bayshore Boulevard, Potrero Avenue, 16th Street, Upper Market Street, Church Street, Geary Boulevard, and California Street.

#### San Mateo

Because San Mateo County's rail stations are generally located in its cities' downtowns, San Mateo's development in Alternative 2 would be similar to that in Alternative 1. Development would be generalby concentrated around Caltrain and BART stations, with intensification of town center type development along the El Camino Real corridor and in existing industrial areas between Caltrain and Highway 101. This alternative also includes a new small, mixed-use downtown in Pacifica, as well as a new employment center at the Baylands.

#### Santa Clara

Under Alternative 2, Santa Clara County's growth would be focused on transit stations and corridors.

- Mixed-use and town centers built in the cores of Milpitas, Saratoga, Los Gatos, Campbell, Los Altos, Morgan Hill and Gilroy.
  - New town center development at VTA and Caltrain stations, and in downtown San Jose.

- New transit-oriented residential neighborhoods built around the planned BART stations south of the Alameda County line.
- Mixed-use development along major corridors such as El Canino Real, Saratoga Avenue, Stevens Creek Boulevard, San Tomas Expressway and the Capitol Expressway.
- Town center development at Moffett Field, connecting to the nearby VTA station, but at a slightly lower intensity than in Alternative 1.

#### Solano

For Solano County, Alternative 2 foresees mixed-use and town center development in all of the county's cities and at a new rail node near Travis Air Force Base.

- Mixed-use development in the central areas of Vallejo. Benicia, Fairfield, Suisun City, Vacaville, Dixon and Rio Vista.
- Development along corridors such as West Texas Street in Fairfield; Merchant Street in Vacaville; First Street in Dixon; and in Rio Vista.
- A low-density town center on Mare Island.
- Residential densities increased through infill in Vallejo and Benicia.

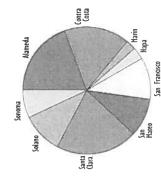
#### Sonoma

Under Alternative 2, Sonoma County development would be distributed among all of the county's existing towns.

- Most new development centered in downtown areas and at potential Northwestern Pacific stops in Petaluma, Cotati, Rohnert Park, Santa Rosa, Windsor, Healdsburg and Cloverdale.
- Mixed-use corridor development on streets such as North Petaluma Boulevard, Santa Rosa Avenue, Sebastopol Road, Broadway and Napa Street in Sonoma, and Highway 12 through the Valley of the Moon.
- Medium-high-density employment around the airport north of Santa Rosa.

GROWTH IN A	GROWTH IN ALTERNATIVE 2 (2000-2020)	2000-2020)
County	Change in Housing	Change in Jobs
Alameda	141,500	242,300
Contra Costa	106,200	130,100
Marin	16,400	29,100
Napa	19,100	27,100
San Francisco	79,800	97,300
San Matro	37,200	77,300
Santa Clara	164,500	222,900
Solano	54,500	77,600
Sonoma	53,600	82,800
Total	672,800	986,500

### ALTERNATIVE 2: HOUSING UNITS BY COUNTY



# ALTERNATIVE 3: SMARTER SUBURBS

Alternative 3 would result in the most dispersed smart growth development of any of the alternatives. It would place new jobs and housing in outlying portions of the Bay Area in an effort to bring the best possible total jobs/housing balance to all parts of the region. All new development, whether in existing or new communities, would incorporate smart growth principles such as mixeduse and walkability. Among the three alternatives, Alternative 3 would focus the least development in core areas like San Francisco and the most in outlying counties like Solano and Sonoma.

#### Alameda

Under Alternative 3, growth in Alameda County would occur primarily on the outskirts of the county, especially in the Tri-Valley area, but with some development in existing downtowns throughout the county as well.

> Alternative 3 generally locates

- Increased development in the downtowns of Livermore, Dublin, Pleasanton, Fremont, San Leandro and Berkeley, and in west and north Oakland.
- New town center development at existing and potential BART and ACE stations in Livermore and Pleasanton.
- New high-density employment centers around the Oakland Coliseum and Airport and along the bay shore in Fremont.

CORRIDORS

along the SAME

same core areas and

growth in the

- Very-low-density mixed-use development at Alameda Naval Air Station, with medium-density mixed-use development at the Oakland Army Base.
- Increased residential and employment densities through infill in downtown Oakland and in all existing residential portions of the county.

DENSITIES.

but at still LOWER

as Alternatives 1 and 2,

### Contra Costa

Alternative 3 growth in Contra Costa County would occur largely in new development at the county's edges and through increased residential density in northwestern, central and eastern parts of the county.

Redeveloped town centers in Richmond, Martinez, Danville, Orinda, Walnut Creek, Concord, Pittsburg and Oakley, but generally at densities lower than those foreseen in Alternatives 1 and 2.

- New town center developments in Pittsburg's "Future Urban Areas" 1 and 2 and in Discovery Bay. A new mixed-use development would occur in southwest Brentwood.
- A new employment center at Concord Naval Weapons Station.
- Increased residential densities through infill throughout existing residential portions of the county.

#### Marin

In Marin County, most Alternative 3 development would be along the northern part of the Highway 101 corridor, in Corte Madera, San Rafael and Novato. This alternative would result in the largest increase in both housing and jobs in Marin of the three alternatives. Downtown and mixed-use development would occur in downtown San Rafael, Novato, and Fairfax, and at Larkspur

- Landing.
  New development nodes would be established at Indian Valley College, Ignacio Center, Peacock Gap, the Canal district and San Quentin.
- St. Vincent's/Silveira transit-oriented mixed-use development.
- Increased residential and employment densities through infill in Novato, San Rafael, Larkspur and Corte Madera, and along major corridors such as Miller Avenue, Tamalpais Drive, Miracle Mile, and Sir Francis Drake Boulevard.

#### Napa

Under Alternative 3, development in Napa County would occur primarily through residential and employment infill, with some town center and mixed-use types of development. Of the three alternatives, this alternative has the largest increase of both housing and jobs in Napa County.

- Intensified low-density residential areas on the east side of Napa and in southeast American Canyon.
- Increased residential and employment densities through infill in American Canyon, Napa, St. Helena and Calistoga.
- Airport industrial park medium-density employment center.

SMART GROWTH STRATTON BROIGNAL LIMMBERY POOTPRINT PROJECT

### San Francisco

Since the "Smarter Suburbs" alternative focuses development at the edges of the region, there would be less development overall in this alternative in San Francisco than in the other alternatives.

- Unlike Alternatives 1 and 2, this alternative does not foresee intensification of the downtown.
- Increased residential densities through infill development throughout the city.
- Town center and mixed-use development in the mid-Market area, the central waterfront, at a new Caltrain station, at Stonestown and at Hunters Point.
- Low-density town center development at the Presidio and Treasure Island.

#### San Mateo

As in the other alternatives, most development in Alternative 3 in San Mateo County would occur around rail transit stations. However, there also would be an increase in residential density using infill throughout the county. A new employment center would be established at the Baylands, with a higher intensity than that foreseen in Alternative 2.

### Santa Clara

In this alternative, development in Santa Clara County would be dispersed among transit nodes extending south to Gilroy, in existing residential areas, and in new communities in the southern part of the county. Of the three alternatives, this alternative shows the largest increase in housing units in Santa Clara County.

- Town center and transit-oriented development at many Caltrain and VTA stations, but at lower densities than foreseen in Alternatives 1 and 2.
- Increased residential and employment densities through infill in all residential neighborhoods of the county.
- A new mixed-use development and a very-high-density employment center in Coyote Valley.
- New mixed-use neighborhoods in Morgan Hill and Gilroy, with an additional employment center in Gilroy as well.

#### Solano

Alternative 3 would disperse development throughout Solano County, especially at the edges. This alternative would result in the highest number of housing units and jobs in Solano County of any of the three alternatives.

- Town center and mixed-use development in downtown Vallejo, Benicia, Fairfield, Suisun City, Vacaville and Rio Vista, and at a potential Capitol Corridor station at Travis Air Force Base. Densities would be lower than those foreseen in Alternative 2.
- New mixed-use nodes in the Cordelia area and around a new rail station north of Benicia.
- Increased infill residential density throughout the county.
- Medium-high-density employment centers at Mare Island and Benicia Industrial Park, with some areas in Dixon and Rio Vista experiencing an increase in employment density as well.

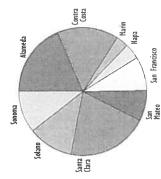
#### Sonoma

Development foreseen for Sonoma County in Alternative 3 would be dispersed throughout the county. This alternative has the largest increase of both housing and jobs in Sonoma County of any of the three alternatives.

- Increased downtown development would occur in Petaluma, Santa Rosa, Healdsburg, Windsor, Cloverdale, Sebastopol and Sonoma, but at densities lower than those foreseen in Alternative 2.
- New low-density mixed-use areas established in Santa Rosa and Rohnert Park.
- As in Alternative 2, a medium- to high-density employment center around the airport north of Santa Rosa.
- Increased residential densities through infill in all residential neighborhoods in the county.

GROWTH IN A	GIERNATIVE 3 (	2000-2020)
County	Change in Housing	Change in Jobs
Alameda	117,500	219,300
Contra Costa	87,700	140,500
Mann	23,700	31,500
Napa	19,600	34,900
San Francisco	66,100	61,600
San Mateo	32,500	45,700
Santa Clara	199,100	213,500
Solano	67,600	141,700
Sonoma	62,900	93,800
Total	676,700	982,500

### ALTERNATIVE 3: HOUSING UNITS BY COUNTY



# The Colors of Growth

Opposite is a pull-out poster with a series of maps showing how the Bay Area might look in the year 2020 under the various alternatives showcased in this Alternatives Report. On the far right is a map of the Current Trends Base Case, inviting a comparison between a continuation of "business as usual" development patterns versus a turn toward a smarter future. On all four maps, the current footprint of development appears as light gray. Among the smartgrowth maps, areas where the footprint remains largely unchanged but where job and/or housing density has been slightly "dialed up" (a 5 percent to 15 percent increase in density) appear as medium gray. On the smart-growth maps, the bright, solid colors mark significant new development of various types. What distinguishes one color from the next is the degree of emphasis on housing versus the emphasis on jobs. In fact, the four colors together represent a continuum. Yellow is reserved for new residential neighborhoods, which, by definition, incorporate very little employment. At the other

end of the spectrum is purple, which designates new employment centers, educational institutions and other uses that for the most part exclude housing. In the middle of the jobs/housing continuum fall brown and red: Brown signifies mixed-use development with roughly a 50-50 split between jobs and housing, while red connotes new, high-density, development where the accent is on jobs, but which also may include an increment of housing. Red is tagged as "town center/downtown," and is scattered among existing city centers and town centers, as well as in fast-developing edge communities. For the purposes of inclusion in this report, these working maps of the smart growth alternatives have been reduced in size and greatly simplified. Larger, more detailed versions — incorporating gradations of yellow, brown, red and purple representing various densities for each of the development types can be viewed on the project Web site, and will be the focal point of the Round Two workshops.

Project Web site: www.abag.ca.gov/planning/smartgrowth/maps.html

ACKNOWLEDGIMIBNTS	

Bay Conservation and Development Commission Bay Area Alliance for Sustainable Development SF Bay Regional Water Quality Control Board Bay Area Air Quality Management District Metropolitan Transportation Commission Association of Bay Area Governments Sponsoring Organizations

Non-Profit Housing Association of Northern California Home Builders Association of Northern California Audubon San Francisco Bay Restoration Program Bay Area Transportation and Land Use Coalition Northern California Council for the Community Regionwide Co-Sponsors of Public Workshops Bay Area Local Initiatives Support Corporation League of Women Voters of the Bay Area California Center for Land Recycling American Institute of Architects Bay Area Rapid Transit District Bay Area Economic Forum Urban Habitat Program Bay Planning Coalition Bay Area Partnership Urban Land Institute Greenbelt Alliance Bay Area Council Urban Ecology Sierra Club PolicyLink

Each countywide public workshop is also co-sponsored www.abag.ca.gov/planning/smartgrowth/sponsors.html by local organizations, listed on the project web site:

CA Dept. of Housing and Community Development Community Foundation: Silicon Valley William and Flora Hewlett Foundation U.S. Environmental Protection Agency David and Lucile Packard Foundation Peninsula Community Foundation East Bay Community Foundation Marin Community Foundation The James Irvine Foundation Additional Project Sponsors San Francisco Foundation California 2000 Project Columbia Foundation U.S. Geologic Survey

Santa Rosa City Councilmember Steve Rabinowitsh (alt.) Regional Agencies Smart Growth Steering Committee San Mateo County Supervisor Richard Gordon (alt.) Walnut Creek City Councilmember Gwen Regalia Danville Town Councilmember Millie Greenberg Los Gatos City Councilmember Randy Attaway Santa Clara County Supervisor James Beall Jr. Alameda County Supervisor Scott Haggerty Contra Costa Supervisor Mark DeSaulnier Marin County Supervisor Steve Kinsey Napa County Supervisor Mike Rippey RWQCB Vice President Mary Warren Contra Costa Supervisor John Gioia Suisun City Mayor James Spering

Robert Harris, V. P., Environmental Affairs, PG & E bay Area Alliance for Sustainable Development Michele Perrault, International V. P., Sierra Club Sunne Wright McPeak, President & CEO, Juliet Ellis, Executive Director, Urban Habitat Program Steering Committee Bay Area Council

David Early, Sara Press, Anita Hairston, Victoria Eisen, ABAG Principal Authors Project Manager

Design, Community & Environment Victoria Eisen, ABAG Brenda Kahn, MTC

Doug Shoemaker, Shannon Dodge, Non-Profit Housing Patrick Duffy, Michael Houston, Gerry Raycraft, ABAG Sunne McPeak, Andrew Michael, Bay Area Council Tim Thomas, Emergency Services Network Jessica Rothhaar, Bay Area Transportation Association of Northern California Juliet Ellis, Urban Habitat Program Eliot Hurwitz, BCDC/NOAA Sherman Lewis, Sierra Club and Land Use Coalition Henry Hilken, BAAQMD Valerie Knepper, MTC **Fechnical Review** 

Analysis

Equity: Victor Rubin, Raymond Colemenar, PolicyLink Housing & Development Feasibility: Paul Peninger, Jonathan Stern, lanet Smith-Heimer, Bay Area

Transportation and Air Quality: Chuck Purvis, MTC Economics

Diana Nankin, Dyett & Bhatia Graphic Design

Peter Beeler, Michele Stone, MTC Graphic Production

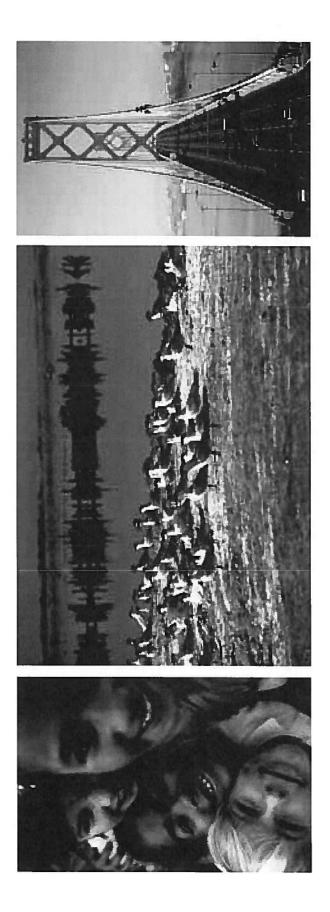
Garlynn Woodsong, Peter Beeler, MTC Kearey Smith, ABAG Cartography

C

Printed on recycled paper by I.T. Litho, Oakland

For more information, go to www.abag.ca.gov/planning/smartgrowth e-mail: smartgrowth@abag.ca.gov write: Smart Growth c/o ABAG P.O. Box 2050 Oakland, CA 94604 Smart Growth Strategy Regional Livability Footprint Project

SHAPING THE FUTURE OF THE NINE-COUNTY BAY AREA



Final Report October 2002

TABLE OF CONTENTS	CREATING THE VISION 3 WHAT IS SMART GROWTH? 5 THE WORKSHOP PROCESS 6 NEXT STEPS	THE VISION 8 PICTURE OF THE BAY AREA, CIRCA 2020	Making Vision Reality: Incentives and Regulatory Change	THE VISION UP CLOSE:AN ANALYSIS OF ONE SMART GROWTH SCENARIO20ENVIRONMENT22TRANSPORTATION23HOUSING26SOCIAL AND ECONOMIC EQUITY29DEVELOPMENT FEASIBILITY	Map of the Smart Growth Scenario
	2 Smart Growth Strategy Regional Livability Footprint Project	Final Report 7	Остовек 2002 13	19	INSIDE BACK COVER

Energized by an abundance of INNOVATIVE IDEAS.

the Smart Growth Strategy/Regional Livability Footprint Project

harnessed the commitment and creativity of our diverse population

to both VISUALIZE and chart a course for a BETTER FUTURE.



PETER CADE



21 BAY NATIONAL WILDLIFE REFUGE



# YEARS IN THE MAKING: CREATING THE VISION

In the waning months of the 20th century, a number of visionary Bay Area leaders began looking ahead to the next century: to what life will be like in the coming decades when an expected 1 million more residents and 1 million more jobs are added to this burgeoning region. In the face of the growing pains we face today — lack of affordable housing, crowded roadways and shrinking open space — they began envisioning where everyone will live and work in 2020. How will we maintain the region's beauty, natural resources, diversity and quality of life if the current growth pattern of spreading ever outward continues? Is it possible, they asked, to change the course of current growth: to find ways for the Bay Area to accommodate its expanding populace, provide adequate housing, improve transportation, and at the same time protect the environment and preserve open space? A tall order indeed. Challenged by the impending need and inspired by new styles of development, committed Bay Area citizens and organizations joined with local and regional government agencies to undertake the task of investigating if and how the Bay Area can grow smarter. The investigation began in 1999, when the Bay Area's five regional agencies<sup>1</sup> — those responsible for transportation planning, environmental protection and regional planning — came together to promote and nurture seeds of "smart growth" that were cropping up throughout the region. At the same time, the Bay Area Alliance for Sustainable Development, a coalition of 40 organizations representing business, the environment, social equity and government, embarked on an ambitious effort to develop public consensus and support for a "regional livability footprint," that is, a

preferred land-use pattern that could direct the Bay Area toward a more sustainable future. In 2000, the regional agencies and the Bay Area Alliance combined their outreach efforts and created the Smart Growth Strategy/Regional Livability Footprint Project. Over the next two years, elected officials, business and community leaders, environmentalists, social equity advocates, planners, analysts, mapmakers, agency representatives and interested citizens devoted thousands of hours to the project. They organized, met, planned, debated, generated ideas, drew maps, made projections and analyzed outcomes. More than 2,000 residents from throughout the region attended daylong Saturday workshops held in each of the Bay Area's nine counties in fall 2001 and spring 2002. Participants conceptualized how future growth should occur in their individual neighborhoods and counties, and in the region as a whole.

Never in the history of the Bay Area have so many individuals, organizations and agencies joined forces to solve the region's growth problems. Unlike prior attempts to develop regional solutions, this project was organized from the start around the precept that widespread support was essential. In addition to a high level of commitment from the private sector and local and regional government agencies, the involvement of local communities was a key ingredient. The interest, creative ideas and participation by residents from Gilroy to Guerneville, and from Pacifica to Pleasanton provide a solid base that enables the region to move forward with a clear sense of direction.

Association of Bay Area Governments (ABAG), Metropolitan Transportation Commission (MTC), Bay Area Air Quality Management District, Bay Conservation and Development Commission, and Regional Water Quality Control Board.

Although much work remains, the vision developed in the public workshops represents a new way of thinking about the region's course of growth: specifically about whether and how it can be altered to meet the needs of future generations without sacrificing the quality of life we enjoy today. This alternative portrays a Bay Area yet to be, envisioned by current residents who confronted the challenge of determining how and where growth could occur. These residents maximized opportunities they saw to effect change, and designed a viable "smart growth" alternative they believe is strong enough to channel decision-making and, at the same time, flexible enough to incorporate adjustments. Far more than a planning exercise, the Smart Growth Strategy/Regional Livability Footprint Project aims to change the underlying fiscal and regulatory structure that is at the root of current growth patterns. Project participants recognized that for a number of reasons, land-use planning in the region today is often unbalanced. Local officials of financially strapped jurisdictions frequently review new development based on whether projects will increase local revenues or cost money to service. All too often, the potential flow of new retail sales taxes into local coffers is more attractive than building housing. At the same time, environmental regulations designed to protect undeveloped areas can have the effect of impeding infill development that could reduce sprawl. And some government funding formulas for infrastructure favor large, sparsely developed areas over densely populated, but geographically smaller, areas. Examples of how current growth patterns can change and how regional agencies and state and federal governments can support more sustainable land-use decisions constitute the heart of this report. New incentives and regulatory changes will dictate, in large measure, how and when the Bay Area can begin to grow smarter.

# WHAT IS SMART GROWTH?

Smart growth does not fit a single definition, and the land-use scenario developed by workshop participants and described in this report is only one of the ways to achieve smart growth in the Bay Area. A common thread among different views is development that revitalizes central cities and older suburbs, supports and enhances public transit, promotes walking and bicycling, and preserves open spaces and agricultural lands. Smart growth seeks to revitalize the already-built environment and, to the extent necessary, to foster efficient development at the edges of the region, with the goal of creating more livable communities with sufficient housing for the region's workforce. Participants in the Smart Growth Strategy/Regional Livability Footprint Project did not have to begin their work from scratch. There are already movements afoot and changes taking place throughout the Bay Area and the nation. Faceless strip malls are giving way to attractive, mixed-use plazas that invite walking and social interaction. High-density housing is cropping up near transit stations. Older, inner city areas are receiving facelifts and an infusion of financial investment. And development in new areas often contains elements of smart growth that its predecessors even a decade ago did not.

# Smart Growth Meets Sustainability

It is these types of smart growth projects that will enable the Bay Area to meet the three key goals of sustainability for future generations: a prosperous economy, a quality environment and social equity.

### The Economy

The Bay Area economy is cyclic, and is projected to recover from its current slowdown and to grow stronger over the next two decades and beyond. The region's prosperity, however, is shadowed by a persistent housing shortage. Housing construction has not kept pace with job growth, and local jurisdictions have zoned for only about half the amount of housing needed for the employees who will fill an anticipated 1 million new jobs by 2020.

## **CHRONOLOGY**

1999

Regional agencies discuss "Smart Growth Strategy" to develop incentives, and

Bay Area Alliance for Sustainable Development plans "Regional Livability Footprint" project.

#### 2000

The two projects merge public outreach efforts.

Regionwide kick-off workshop

2001

Meetings in each county to discuss local growth issues and opportunities to collaborate Bay Area planning directors review project.

First round of public workshops

Regionwide meeting to distill Round One workshop products

2002

Analysis of three regionwide alternatives

Second round of public workshops

Adoption of Smart Growth Vision and more specific Smart Growth Scenario Efforts commence to advocate for needed incentives and regulatory changes.

ABAG develops policy-based projections using Smart Growth Scenario as

2003

starting point.

ABAG Executive Board considers adopting smart growth policy-based projections.

ž
02
4
분
RI
E
HOOTPRIN
2
E
LIVABILITY
7
IVI
REGIONA
BG
×
6
ATT N
TR.
Ś
E
5
RO
r GROV
ART GROV
SMART GROV

**GROWTH TRENDS** 

residents and 1 million jobs On the surface, that sounds like a look. Already there are more jobs than workers who live in the commuters flowing into the worker/job gap is projected to air quality and open space, both Bay Area will grow by 1 million between now and the year 2020. Bay Area, with some 165,000 region each day from outlying areas. Since not all of the new residents predicted for 2020 will be part of the workforce, the worsen, with the number of incommuters expected to grow. This trend has ominous implications for housing demand, traffic, If current trends continue, the perfect balance, but take a closer within and outside the Bay Area.

An argument could be made for addressing this imbalance by curtailing the region's economy and job expansion. But fully half of the projected new residents will result not from in-migration from other areas, but from births outpacing deaths. In other words, the smart growth debate is not only about accommodating newcomers, but also about leaving livable communities for our own children and our grandchildren.

Workers today struggle to find housing they can afford; businesses face pressure to meet resulting wage needs and often have trouble recruiting employees. By its very nature, the concept of smart growth can match the goals of a sustainable future for the Bay Area. The region's economy will benefit when its severe housing shortage is addressed, and workers can afford to live nearer their jobs. The smart growth vision developed by workshop participants does more than bridge the spatial jobs/housing gap. It provides enough units, particularly of affordable housing, to accommodate the 1 million new Bay Area residents expected by 2020, as well as enough units to house workers and their families who otherwise would have to commute from neighboring counties.

## The Environment

The Bay Area's natural beauty is one of its strongest draws. Abundant opportunities to enjoy the outdoors, from coastal beaches to the Bay, oak-covered hillsides and redwood canyons, are treasured by its residents as irreplaceable assets. If the Bay Area continues to grow as it has in the recent past, however, 83,000 acres of currently undeveloped land could be covered with new structures by 2020. Amounting to an 11 percent increase in the urbanized Bay Area — an area two-and-one-half times the size of San Francisco — this development would erode farmland, greenbelts and other open spaces.

Current trends also threaten Bay Area air quality. Likewise, the region's per capita water consumption will increase under current trends that project the construction of primarily detached, single-family development in the Bay Area's hotter, inland areas.

The smart growth vision helps sustain the region's environment by promoting more compact development that can accommodate a projected population increase and at the same time, preserve much of our remaining open space. By combining shops, offices and housing in mixed-use and mixed-income neighborhoods,

and locating housing and job centers within walking and bicycling distance of transit stations, smart growth will improve access to employment and services, and shorten commutes. As a result, there will be less demand to expand and build new roadways.

### Social Equity

Social equity aims to ensure that people of all income levels have access to housing they can afford, good schools, reliable transportation, various types of employment, and toxicfree communities. Social equity means that all residents particularly those in low-income brackets — benefit from new investment in their communities, gain equal access to economic opportunities and have a chance to actively participate in community planning efforts. While recognizing the challenges to making housing, services and employment available in lower income communities, workshop participants envisioned how smart growth can reduce some of the current inequities. Construction of housing for a mix of incomes throughout the region can provide more geographic choices for low-income residents. Public transportation improvements and mixed-use development along transit lines can enhance job access, and greater housing densities in impoverished neighborhoods can spur creation of basic services such as grocery stores and child care. While they endorsed the concept of linking smart growth to social equity, workshop participants emphasized the need to protect existing residents from displacement. Smart growth means careful management to avoid triggering changes that disrupt communities and lead to displacement and economic and social isolation.

The **biggest challenge** will be to enact the FISCAL

INCENTIVES &

regulatory changes

necessary to make smart growth more than a good idea.

### PULL-OUTS

• Map. The map at the back of this report indicates the types and locations of future development as proposed by workshop participants, as well as areas to be protected as open space and agricultural land. • Legislative Update. Central to the smart growth process are the fiscal incentives and regulatory changes needed to get there, described on pages 13-18 and in the pocket inside the front cover of this

report.

The three alternatives were put to the test to see how they measured up in terms of promoting a livable and sustainable lifestyle in the Bay Area circa 2020. An extensive analysis examined the impacts of each on the environment, transportation, housing, jobs/housing balance and social equity.

The analysis further estimated the feasibility of each scenario, as well as the incentives, regulatory changes and other public policy changes identified by workshop participants that would be needed to make any smart growth process a reality.

## **Alternatives Report**

In the spring of 2002, a comprehensive *Alternatives Report* describing the three smart growth strategies was published, thus heralding the start of a second round of county-level public forums. More than 1,000 residents, the majority of them new to the process, attended the Saturday sessions held in April and May. At each Round Two county workshop, participants voted on one alternative as the starting point for further fine-tuning. They then developed and agreed on guidelines for modifying their choice, and with the aid of county maps, adjusted this alternative to bring it closer to their vision of their particular county's future.

### **Regionwide Vision**

Following the Round Two workshops, the nine countywide alternatives were stitched together to create a single regionwide smart growth land-use vision. The regionwide vision incorporates the choices and decisions made by participants in the nine county workshops. It reflects their selections of mixed, matched and changed alternative growth scenarios appropriate for each county. The resulting portrait of the Bay Area's future shows a *pattern* of growth that, by and large, looks like Alternative 2, the Network of Neighborhoods. The *amount* of growth, however, varies quite a bit from county to county. The regionwide map depicts higher densities in major urban areas and a proliferation of compact, mixed-use and mixed-income neighborhoods along transit corridors, particularly near transit stations, as well as in town centers and in a handful of peripheral areas. This pattern of growth is far from a "cookie cutter" overlay of development on the region, however,

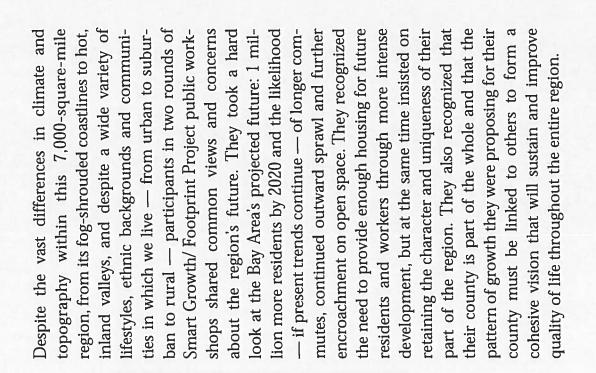
and the smart growth scenario clearly shows how the amount of housing and job growth varies from county to county. This view reflects the vision of workshop participants who in some counties chose to reduce development foreseen under Alternative 2, while participants in other counties increased it. In August 2002, the project steering committee (made up of locally elected officials who sit on the boards of the five regional agencies) adopted an illustrative, written description of the smart growth vision of workshop participants. In a separate action, they accepted the specific patterns of growth that participants had identified for each county as a starting point to guide ABAG as they develop a policy-based (rather than trends-based) set of 20-year jobs/housing projections for the region.

## NEXT STEPS

In fall and winter 2002, local jurisdictions and others will review these smart growth policy-based projections as they evolve. In early 2003, the ABAG Executive Board will consider adopting these alternative projections. If adopted, they will become the backbone of the Metropolitan Transportation Commission's 2004 Regional Transportation Plan, the document that will guide transportation investments in the region for years to come, as well as the Bay Area Air Quality Management District's clean air plans and other regional plans.

To build on the momentum that has been generated throughout the Bay Area for the Smart Growth Strategy/Regional Livability Footprint Project, an ongoing public education and engagement campaign will be spearheaded by the Bay Area Alliance for Sustainable Development. Undoubtedly, the biggest challenge facing the project will be to enact the fiscal incentives and regulatory changes necessary to make smart growth more than a good idea. ABAG will work together with the other regional agencies, the Bay Area Alliance and local governments throughout the region to develop and pursue needed policy changes. It will take time to accomplish the goals, but the path has been laid out, and a critical mass of Bay Area residents believes it is time to begin.

# THE VISION



TOTOS \_\_ NASA, COLLAGE - MTC

# PICTURE OF THE BAY AREA, CIRCA 2020

What does this collective vision of smart growth for the Bay Area hold in store? What would it be like to live here two decades from now? What changes would take place in the region's cities, towns and neighborhoods? And how would following the path of smart growth envisioned by 2,000 workshop participants differ from our present course of growth? Imagine, if you could, fast-forwarding to the year 2020 and viewing the Bay Area through the lens of smart growth, based on the vision of residents back in 2001 and 2002. San Francisco Bay — the magnificent natural resource that gives the region its unique identity — continues to be protected, with Bay wetlands restored, more shoreline parks opened, and attractive new development built in the vibrant waterfront communities. Ribbons of rail lines stretch from northern Sonoma County to southern Santa Clara County, and from San Francisco to the far eastern reaches of Alameda, Solano and Contra Costa counties. The rail lines extend existing public transit systems with more frequent service and include a new North Bay rail line. Numerous new stations dot each line. Commercial corridors on major thoroughfares throughout the region bustle with buses and light-rail vehicles. Adjacent to the rail stations — within a half-mile radius — and in older downtown areas, there is intensified development of various kinds: multi-family and mixed-use buildings, many with retail stores and shops on the street level offering services from cafes to dry cleaning and childcare, with residential quarters above. Significantly more housing is being constructed to match the income levels of increasing numbers of Bay Area workers. The racial mix of the Bay Area reported in the 2000 Census is even more diverse in 2020. Many more second units, townhouses and apartments have arisen in new, mixed-income neighborhoods and in communities once devoted to only one type of housing.

Local governments, aided by new state and federal policies, have been making major strides in solving the Bay Area's housing crisis, actually housing the quarter of a million Bay Area workers

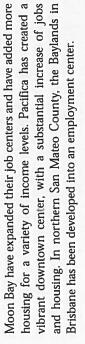
who would otherwise be commuting into the region each day. These cities offer developers financial incentives to provide housing affordable to families on the lowest income rung; they enable higher densities than previously existed, including a new wave of once discouraged "granny" units built into or as additions to existing single family homes. Declining neighborhoods are revitalized and have become healthy, vibrant communities attracting new residents and businesses, while maintaining a place for longtime inhabitants.

in 2020 than would have if growth trends prevalent in 2000 had in-commuting to the region since 2002. But, despite this shift in population to the Bay Area, traffic on the region's freeways and in-commuters been living outside the Bay Area. How can this be? Area residents of the smart growth future often walk and bicycle for residents of the region's inner city communities. Due to the Collectively, these changes mean many more workers live in the continued. In fact, there has not been an increase in daily major roadways is no worse than it would have been had these housing and jobs mixed in closer proximity to each other, Bay to their destinations. Locating more housing and job centers near This trend greatly improves economic opportunities, particularly much greater convenience of transit, walking and cycling, air pol-By living in more compact communities, with stores, services, bus stops and rail stations also lures commuters out of their cars. lutant levels will be slightly lower under the smart growth vision, Bay Area — rather than commuting from outside the region even while accommodating more housing in the region. The smart growth map of the Bay Area in 2020 shows nearly the same amount of open, undeveloped land that existed in 2002, despite two decades of population increase. Again, this reflects the concept of increasing density in already developed areas and focusing growth in existing cities and town centers and along transit corridors (including some expanded transit hubs and corridors that did not exist in 2002). New compact development also occurs in some areas that were vacant and undeveloped in 2002. Such efficient development within the region provides housing and transit access to people who otherwise would have been commuting into the region. At the same

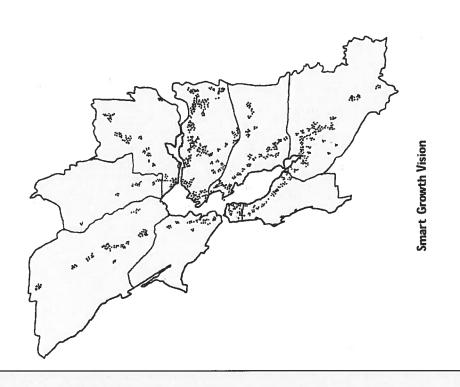
time as preserving open space within the region, the new pattern of compact growth has reduced the need to house the Bay Area workforce outside the region, thus helping protect farmland and critical habitat beyond the Bay Area. Traveling in the Bay Area from county to county in 2020, you find that you still recognize familiar landmarks and scenic vistas and know where you are. You realize that things have not changed drastically because the growth that has taken place in the past two decades consists primarily of more intense development in existing areas. Nonetheless, vibrant communities abound throughout each of the Bay Area's nine counties. Moving from south to north, here are some highlights: In Santa Clara County, growth is focused around Caltrain and new BART stations — from Palo Alto and Milpitas south to Gilroy — as well as adjacent to Valley Transportation Authority light-rail stations. A new light-rail corridor between Milpitas and Mountain View is lined with two- and three-story retail, office high-rise office and residential buildings near the new downtown density downtown centers with a mix of housing types for a wide range of wage earners. A new Caltrain station serves an adjacent employment center in Blossom Hill, and more jobs can be found farther south in the Morgan Hill business park. To accommodate as some of the county's smaller cities, such as Gilroy and Los Gatos, have added apartments and townhouses in their and light industrial buildings as well as some housing. Downtown San Jose has matured into a taller city, with many BART stations. Mountain View and Sunnyvale have fairly highemployees in the business park, Morgan Hill has created a highdensity town center with a mix of residential and commercial buildings oriented around its Caltrain station. Sunnyvale as well downtown centers, creating compact neighborhoods centered around lively plazas.

San Mateo County has intensified growth along the El Camino Real corridor, parallel to the Caltrain line, and fostered higherdensity development in cities along that corridor: East Palo Alto, Menlo Park, Redwood City, San Carlos and San Mateo. On the coast, the small communities of Montara, El Granada and Half

San Francisco Bay the magnificent natural resource that gives the region its UNIQUE IDENTITY continues to be PROTECTED, with Bay wetlands restored, more SHORELINE PARKS opened, and attractive new development built in the vibrant waterfront communities.

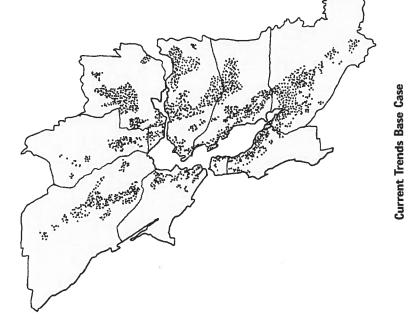


ing goal, has created a better jobs/housing balance by building in some residential areas, the housing increase is slight, while in ng shape. Housing and employment have increased along the stations, along the new Third Street light-rail line that extends and near a Caltrain station relocated from Paul Avenue to Silver sit corridors such as Geary Boulevard and California and Mission streets — a high-density mix of offices, stores and housing is tak-Church Street corridor, as well as in Dolores Heights and in Bayview/Hunters Point. The city also has created mixed-use centers of office, retail and housing around neighborhood BART from Visitacion Valley and Bayview Hunters Point to Chinatown, able to its residents in all income levels, including entry-level office workers, hotel and restaurant workers, gardeners and The City and County of San Francisco, pursuing a long-standmore housing throughout the city, particularly downtown. other areas — extending out from downtown along major tranand Oakdale avenues. Through new fiscal policies and incentives, the city is ensuring that an adequate supply of housing is affordschool teachers. Across the Bay, Alameda County communities are accommodating a growing population by encouraging a slight increase in housing density in existing residential areas in close-to-the-Bay cities such as Alameda, Oakland, Berkeley, Piedmont and Emeryville. Some areas have achieved a 5 percent density increase simply by adding one in-law unit on every city block. Downtown Oakland is blossoming with high-density structures of offices, stores and mixed-income housing. Served by greatly improved ferry and bus service, the former Alameda Naval Air Station has become a moderately high-density community with a mix of three- and four-story commercial and retail buildings surrounded by one- to four-story residential buildings. Similar mixed-use development is occurring around BART stations, from Berkeley



THE ALTERNATIVES IN BLACK AND WHITE These maps show in bold relief the growth patterns foreseen in the Smart Growth Vision and the Current Trends Base Case. They indicate primary areas of change that

And the formation of th



include both redevelopment of already developed areas ("infill") and construction on currently undeveloped lands ("greenfields").

south to the new Irvington and Warm Springs BART stations. Mixed-use development of housing, retail and offices also is appearing along major transit corridors, such as San Pablo Avenue and Mission, Hesperian and International boulevards, and a multimodal transit center has recently opened in Union City. The city of Fremont has created a downtown center with high-rise office and residential buildings, while in the eastern part of the county, mixed-use, mixed-income development is occurring near the BART and Altamont Commuter Express (ACE) stations. The Tri-Valley citles of Dublin, Pleasanton and Livermore are preserving their surrounding areas of open land by developing compact neighborhoods within walking distance of schools, stores, services and public transit.

**Contra Costa County** has successfully retained roughly twothirds of its land as open space or in agricultural production. Much of the new housing is located in and around the existing cities, with continually improving access to transportation options. New transportation linkages between Central and West County have opened the door to significant reinvestment in the downtowns and surrounding areas. The creation of new housing opportunities through creative integration with existing towns and neighborhoods has increased both housing choices and affordability. Job growth has been strong along the Interstate 80 and Interstate 680 corridors, bringing a diversity of jobs closer to Contra Costa's residents.

In an attempt to allow more residents to work near where they live, Solano County has sought to strengthen its employment centers. While there has been a slight increase in density in residential areas, the county has encouraged development of three- and four-story commercial buildings along portions of the 1-80 corridor and mixed-use development around Capitol Corridor rail stations. Two new Capitol Corridor stations have been built, one adjacent to Travis Air Force Base and another in Dixon. Solano County has preserved its strong agricultural industry and character by focusing new development within its incorporated cities. The downtowns of Vallejo (including adjacent Mare Island), Benicia, Fairfield, Suisun City, Vacaville

#### WORKING TOGETHER to create a vision of a more SUSTAINABLE FUTURE FUTURE is a critical component of the of the Smart Growth/Footprint

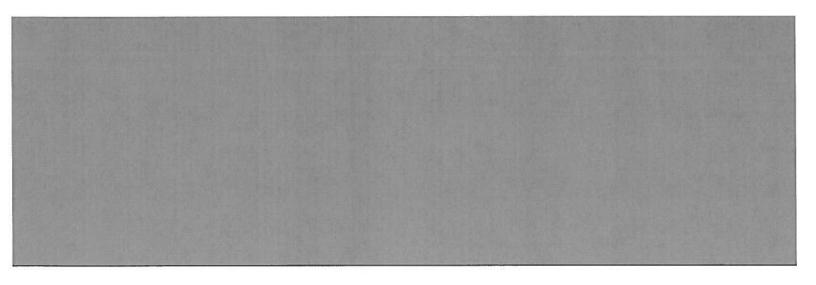
nart Growth/Footprin Project, but it is just the first step.



Sonoma County, like Napa, STRIVES to retain its historic rural and agricultural character.

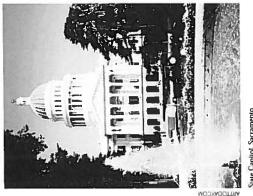
and Dixon have become bustling centers of employment and housing, where people walk and bicycle from home to work and to downtown stores and restaurants. In Napa County, growth is occurring primarily in the southern part of the county, while the rest of the county maintains its traditional rural and agricultural character. American Canyon has developed shops and stores to serve suburban housing developments. More people work at the nearby Airport Industrial Park, which has added thousands of new Jobs in the past 20 years. The city of Napa has intensified development of offices, stores and housing in its downtown core and added a mix of uses on a low-density scale in surrounding neighborhoods. New mixeduse development also is occurring at the site of the former State Hospital in the city of Napa. Housing has increased slightly in St. Helena outside the downtown area, and Calistoga has added more housing and shops in its downtown. Using a number of creative policies, Napa County and its citles are generating new housing to meet the needs of their lowest wage earners. In **Sonoma County**, the primary new feature is a rail line that extends along the old Northwestern Pacific railroad right of way all the way from Cloverdale south into Marin County. As the line was built, new stations were added in Healdsburg, Windsor, Santa Rosa, Rohnert Park, Cotati and Petaluma. Along the line and particularly around the stations, mixed-use communities, mostly on a low-density scale, are being built for a wide range of income levels. Sonoma County, like Napa, strives to retain its historic rural and agricultural character, in part by encouraging increased housing densities in existing residential areas, primarily through the addition of second units. In Marin County, as in neighboring Sonoma and Napa counties, new growth is occurring primarily in already developed areas. The Northwestern Pacific rail line continues south through the towns of Novato and San Rafael, with housing, shops and offices cropping up adjacent to the new stations. San Rafael con-

tinues revitalizing its downtown with intensified, mixed-use development, including a large percentage of affordable housing units, and a large urban office campus. The downtown areas of Fairfax, Larkspur and Marin City have seen slight increases in their residential populations, as housing units for a range of income levels are built above stores and offices. And the populations of existing residential communities are increasing slightly, primarily due to the addition of second units.



# MAKING VISION REALITY: INCENTIVES AND REGULATORY CHANGE

I



State Capitol, Sacramento

smarter development ALTERING decades of tradition will require a MAJOR SHIFT inducements for patterns. creation of new fiscal and regulatory in thinking and the

# INCENTIVES AND REGULATORY CHANGE

sioning a smart growth future is far simpler than the task of making it a reality. To build a smarter future for the Bay Area, we will need to change our tax system, our regulations on land use As participants in the smart growth workshops realized, enviand the criteria we use for distributing state and federal funds. Indeed, we must change the "carrots and sticks" that shape landuse decisions by localities, neighborhoods and private developers. Altering decades of fiscal and regulatory tradition will require a major shift in thinking and the creation of new inducements for smarter development patterns.

developers, neighborhood groups and others — to move ahead in developing smarter communities. Meanwhile, the Bay Area's Local governments already have policy options they can use to promote and implement smart growth projects, but the state ulatory changes to encourage local governments --- as well as regional agencies can help create a more conducive environment and federal government need to institute new incentives and regby adopting new policies and strengthening existing ones that promote smart growth. As workshop participants confronted the challenges of initiating change, they proffered hundreds of ideas on how to cultivate smart growth projects that are emerging in various parts of the Bay Area and to propagate them throughout the region. Listed below are brief descriptions of some of the kinds of legislative incentives and regulatory changes that could help every incentive and regulatory change on these pages would achieve smart growth objectives. They were suggested by Smart Growth/Footprint Project participants, but are only examples. They have not been approved by the project steering committee nor by any participating stakeholder groups. Each and involve trade-offs that must be thoroughly considered before any are pursued.

# Objective 1: Stimulate housing construction and promote permanently affordable housing.

# Remove disincentives to providing housing.

subsequent taxpayer-sponsored initiatives, including Proposition 218, local governments have lost much of their control over tax rates and expenditure of public funds to the governor and the Legislature. If local governments were given back their share taxes from being reallocated. Under state Proposition 13 and of property taxes, they would look more favorably upon new housing as a source of revenue to pay for necessary services, such The state constitution could be amended to protect locally levied as schools, fire, police, libraries and parks. Fund neighborhood-level planning to provide certainty in development review process.

struction before a developer commits to a particular site. This process gives certainty to developers when they reach the devel-New state and regional grants could help local planners prepare such plans and environmental documents for mixed-use, infill Specific plans that cover multiple development projects in a focused area can allow cities to define appropriate types of conopment review process, thus encouraging desired development. and transit-oriented projects and could link such funds to a commitment to build needed housing.

# Provide incentives to promote housing affordable to the region's workforce.

expediting the permitting process, and relaxing zoning standards. ple, can be reduced, because residents and workers in dense profit developers to create permanently affordable housing by Local governments can offer incentives to nonprofit and forallowing higher densities than would be otherwise permitted, Parking requirements for housing near public transit, for examneighborhoods near transit tend to own fewer cars.

# **NEW AND PROPOSED INCENTIVES**

Several organizations have already proposed or developed ideas for incentives and regulatory changes:

# **Community Capital Investment Initiative**

In partnership with the Bay Area's poorest communities, high priority Bay Area Alliance project to attract private investment and smart growth to these neighborhoods. CCIIBAA@BayAreaAlliance.org

# Speaker's Commission on Regionalism

Blue ribbon committee of elected, business, environmental, labor and equity leaders from throughout California. Recently released report identifies state policy changes needed to allow regions to address economic competitiveness, persistent poverty, underemployment, traffic congestion, long commutes, unaffordable housing, and loss of open space and habitat. www.regionalism.org

# The Urban Land Institute (ULI)

ULI's California Smart Growth Initiative is guided by business, development, environmental, social justice, civic and local government leaders from throughout the state, has identified specific priority areas and actions that the state of California should take to promote smart growth practices. www.smartgrowthcalifornia.uli.org

# Transportation for Livable Communities

The Metropolitan Transportation Commission has tripled its Transportation for Livable Communities program, from \$9 million to \$27 million annually. This program funds pedestrian-, bicycle- and transit-related improvements, and includes a separate Housing Incentive Program for transit-oriented housing. www.mtc.ca.gov

Inclusionary zoning laws require new housing developments to include a certain percentage of units (usually 10 percent to 20 percent) that is affordable to very low-, low- and moderateincome residents. Although some feel that such policies unfairly burden buyers of market-rate units in the same development, San Francisco, East Palo Alto, Union City, Dublin, Danville, Richmond, Napa, Petaluma, Santa Rosa and several cities in Marin County have adopted such requirements.

Many communities also have adopted jobs/housing linkage fees that require all new job-generating projects to pay a fee toward the development of affordable housing. Although some feel that these fees unfairly penalize businesses producing new jobs, many communities have already adopted them, including San Francisco, Menlo Park, Cupertino, Pleasanton, Livermore and Napa. Sonoma County is considering a countywide program.

# **Objective 2: Improve urban infrastructure**

Create a stable revenue stream for local governments (e.g., return of property taxes).

During the 1990s, the state shifted approximately \$3 billion of local property taxes annually from local governments to the Educational Revenue Augmentation Fund (ERAF), which supports public schools. The loss of property tax revenue — a trend exacerbated by the difficulty of establishing new revenue sources — has caused many communities to rely primarily on development fees and retail sales taxes to fund local services. Unlike property taxes, these revenue streams can fluctuate widely from year to year, making long-term budgeting and planning difficult for local governments. Returning ERAF funds to local governments and restoring state support of public schools through other means could help reduce local reliance on fees and sales taxes and provide a more stable revenue stream for local governments.

Parking requirements for housing NEAR PUBLIC TRANSIT can be reduced because residents and workers in dense neighborhoods in dense transit tend to own FEWER CARS. The inside front pocket of this report contains a more detailed summary of specific legislative changes being pursued by the Smart Growth Strategy/ Regional Livability Footprint Project. A description of these legislative efforts also is available online at: www.abag.ca.gov/planning/ smartgrowth.

Reward local governments for enacting smart building codes that allow retention of historic character while ensuring	public safety.	The state can offer incentives to local governments that adopt building codes that allow and encourage retention of historic aspects of their communities. Creating flexible regulations while	maintaining safety takes creativity on the part of planners and building officials.	Objective 3: Avoid displacement of existing residents and businesses.	Require that the existing stock of affordable housing be maintained.	Housing trust or bond funds can provide funding for existing affordable housing developments in danger of losing subsidies or tax-exempt status.	Create programs and regulations that promote living-wage jobs and services in low-income communities.	By setting a minimum wage that can support a full-time worker, the state could help foster stable communities. In addition, aggressive job training and economic development programs can be fostered by the state in low-income communities to create	better job and entrepreneurial opportunities for local residents. Merchants can be encouraged to locate grocery, clothing, hardware and other types of stores and services in low-income neighborhoods to enable local residents to work, shop and generate income in their own communities.	Create programs to allow local public employees to live in the communities in which they work.	State or regional funds could be used to offer housing subsidies or income tax credits to employees who live close to their work- places. Many local governments already provide such subsidies to teachers, police officers and firefighters.
Prioritize infrastructure funds for smart growth infill projects.	The state could demonstrate support for smart growth by prior- itizing funds to help improve and replace existing infrastructure	facilities — new roads, sewer lines and other utilities — in already urbanized areas.	Provide state funds for cleanup of brownfields and to limit liability for contamination.	The state could provide fiscal incentives for cleanup of old indus- trial "brownfield" sites — contaminated properties — that are	suitable for new uses, particularly for housing. Developers also would be more inclined to develop on such sites if limits were set on their liability for prior contamination. As an inducement to	develop on contaminated infill sites, some local governments like Emeryville already post on their city's website the location of vacant parcels and their soils analysis.	Subsidize infrastructure for water recycling to ensure adequate water supply.	Subsidies for construction of separate irrigation systems would encourage use of recycled water for nonpotable uses. Similarly, price differentials for fresh versus recycled water would promote greater use of recycled water for golf courses and the like.	Link funding for new schools to smart growth criteria, such as: locating in neighborhood centers to promote pedestrian and bicycle access; designing for after-hours use as community centers; and building smaller scale structures to maximize proportion of nearby students.	Schools, both new and renovated, that also function as commu- nity centers give vitality to neighborhoods during non-school	hours, while providing needed gathering places. School districts can be rewarded for developing joint community facilities in connection with new neighborhood schools.
ju	E BIA CHANKEN RANGEN						The state	could provide FISCAL	cleanup of cleanup of old industrial brownfield sites that	are suitable for	11GW (1969.

SMART GROWTH STRATEGY REGIONAL LIVABILITY FOOTPRINT PROJECT

16

# Objective 4: Protect open space and agricultural lands.

Encourage or require communities to enact urban growth boundaries (UGBs) or urban limit lines and link such policies to development of infill housing. By combining UGBs with local policies that encourage infill development — particularly of new housing — development can be focused in areas where infrastructure already exists. In addition to protecting our remaining open space, growth boundaries help maintain the vitality of cities by encouraging more residents to live within walking distance of services and public transit.

# Provide incentives for infill development to avoid leapfrog development.

Local governments can identify and inventory potential sites suitable for infill development. They can go a step further by rezoning unused industrial areas and underutilized shopping strips for new mixed-use development, and they can adopt ordinances to allow development of second units without complex or expensive approval processes.

# Objective 5: Encourage new development that reduces dependence on single-occupant vehicles.

Reward local governments for approving new jobs and housing near public transit stations.

New transportation funding could be used to encourage mixeduse development around rail and bus hubs. State and federally funded transportation programs, such as MTC's Transportation for Livable Communities and Housing Incentive programs (see box on page 15), could be expanded with increased funding.

Streamline the California Environmental Quality Act (CEQA) process for specific kinds of development.

Although transit-oriented and mixed-use projects can increase local congestion by attracting more people and cars to an area, such projects can allow more residents to commute on public transit and run more errands in the surrounding neighborhood on foot. Although some workshop participants were nervous about discussing any changes to CEQA, others proposed exempting these projects from CEQA altogether or only from currently required traffic analyses. A similar exemption already exists for low-income housing projects of 100 units or less.

Provide incentives that encourage mixed-use, compact, transit-oriented, infill development.

Local governments can encourage developers to create attractive new neighborhoods near public transit, with narrow streets, landscaping and other amenities that invite walking and bicycling. Congestion management agencies can work with local jurisdictions in updating their general plans to reflect more transit-supportive land uses along the transit network and can include those new land-use scenarios in countywide transportation plans. State financial rewards for such development can help local governments, developers and others overcome biases toward single-use, spread-out developments that favor automobile use. Provide increased funding to improve the safety, reliability and convenience of transportation alternatives such as rail, bus, ferry, bicycling and walking.

The Bay Area plans to spend 77 percent of all transportation funds over the next 25 years on public transit. This will help attract new riders. Only when it becomes easier, safer and more reliable to ride a bus, ferry or rail line than to drive a car will the choice be a viable one. Likewise, when the safety of pedestrian and bicycle pathways is assured, more people will opt to walk or bike to their destinations and leave their cars at home.



In addition to protecting our remaining OPEN SPACE, growth boundaries help maintain the VITALITY

of cities.

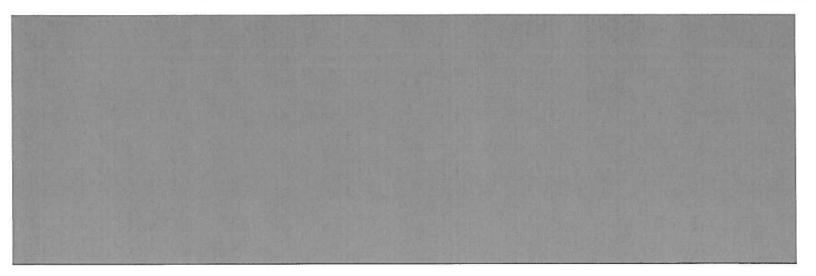
Use parking pricing and availability to encourage use o transportation alternatives.	Free parking can serve as a disincentive to using alternative to the single-occupant vehicle. Meanwhile, some places have such high demand for parking that people are willing to pay a fee, gen erating funds that could be used to improve public transit. Citie also can institute parking ceilings that limit the amount of park ing in new developments.	DABLE HOUSING PROGRAMS	r attordable housing development. Here are some examples.	Inclusionary Loning The city of retaiuma program requires 10 percent to 15 percent affordable homes in both rental and for-sale	housing developments of five homes or more. Working with devel- opers, Petaluma has created 1,400 affordable homes for lower and moderate income households since 1984.	Redevelopment Agency Commitments Oakland, San Francisco, San Jose and Santa Clara are raising the proportion of their	redevelopment funds dedicated to affordable housing.	gages for housing in convenient, transit-rich neighborhoods where data show members of typical households drive less and spend less	on transportation. Available through a demonstration project in the Bav Area. LEMs allow households to qualify for larger mortgages by	taking reduced automobile expenses into consideration.	Jobs/Housing Linkage Programs Sonoma County and cities within the county are taking the first steps toward adopting
Provide tax bonuses to cities that approve compact, mixed-use development near public transit, perhaps in designated "smart growth zones."	"Smart growth zones" can be created in communities that reshape their land-use policies and meet smart growth criteria, in return for which they will receive tax incentives, grants, loans and technical assistance from the state for planning and environmental review.	INNOVATIVE BAY AREA AFFORDABLE HOUSING PROGRAMS	Already, Bay Area communities have created programs to spur attordable housing development. Here are some examples.	Housing Trust Funds The Housing Irust of Santa Clara County Is a unique public/private partnership that has raised over \$20 million,	two-thirds of it from the private sector, and the remainder from pub- lic agencies including Santa Clara County and each of the 15 cities in the county to provide first-time homehover assistance for 800	families, create affordable rental housing for 3,000 families, and build transitional and permanent housing for the homeless.	Flexible Zoning The city of San lose provides for flexible zoning with its Discretionary Alternate Use policies such as density	bonuses and the use of city-owned surplus land for affordable hous- ing developments.	Farm Worker Housing Recently-passed state legislation —	County to levy an annual fee on planted vineyards to provide and	maintain housing for farm workers. Vineyard property owners who provide housing for their workers are exempted from the fee.
					When the	<b>safety</b> of pedestrian and bicycle	pathways is assured,	more people will	leave their cars	AT HOME.	

SMART GROWTH STRATEGY REGIONAL LIVABILITY FOOTPRINT PROJECT

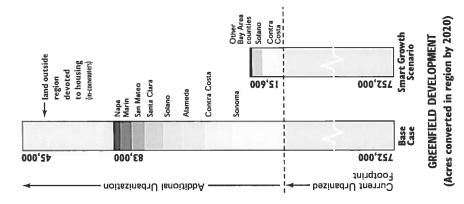
Bonds In 1996, San Franciscans passed a \$100 million general obligation bond to create and preserve 2,400 affordable homes. Building on this success, voters will decide on a \$250 million bond measure in November 2002. If passed, three-quarters of the money will fund affordable rental housing, with the balance assisting families buying their first home.

tion project in the County and cities within the county are taking the first steps toward adopting ger mortgages by ration.

ments to contribute funding for affordable housing. This could generate as much \$35 million over the next five years, which could be combined with other funding sources to build 1,200 a countywide linkage program that would require new developaffordable homes.



## THE VISION UP CLOSE: AN ANALYSIS OF ONE SMART GROWTH SCENARIO



## **TECHNICAL APPENDICES**

For more detailed information behind the analysis summarized in this report, please see the online technical appendices at:

#### www.abag.ca.gov/planning/ smartgrowth/TechAppendix.html

# ANALYSIS OF ONE SMART GROWTH SCENARIO

This chapter summarizes the quantitative analysis of the specific smart growth land-use scenario developed by participants in county workshops in 2001 and 2002. The analysis provides an objective comparison of this smart growth scenario to the "current trends base case," i.e., the pattern of land use that is likely to occur if we do nothing to chart a new course.

Although this chapter analyzes the specific land-use scenario developed by workshop participants, there are innumerable ways to accomplish smart growth in the Bay Area. The analysis explores one possible model of a smart growth future for the Bay Area.

#### ENVIRONMENT

#### **Greenfield Development**

If the Bay Area continues to grow as it has in the recent past, 83,000 acres of "greenfields" (i.e., currently undeveloped land) could be converted to urban use by 2020. Amounting to an 11 percent increase in the urbanized Bay Area, this acreage is more than twice the area of San Francisco and will erode farmland, greenbelts, community separators and other open spaces. Moreover, the current trends base case would not provide nearly enough housing within the nine Bay Area counties for the number of workers expected by 2020. Therefore, the housing that would need to be built outside the Bay Area to accommodate in-commuters might require as many as 45,000 additional acres, assuming today's average densities in surrounding counties. By contrast, the smart growth land-use scenario would increase the urbanized footprint of the Bay Area by less than 16,000 acres, or 2 percent. It provides significantly more housing for new residents, but at the same time, saves highly prized open space and agricultural land — both within the Bay Area and in outlying areas such as the fertile Central Valley — by calling for compact, mixed-use communities that are close to transit lines and employment centers.

#### Air Quality

Loss of greenfields is not the only way that future development will impact the environment, both within the region's borders and beyond. Although a much cleaner vehicle fleet is improving air quality regardless of development patterns, air quality will suffer or improve, depending on how the Bay Area grows. All things being equal, the more that residents, workers and others depend on single-occupant vehicles, the more difficult it will be to improve our air quality. Bay Area households make approximately ten trips a day, on average, and 82 percent of these are by car. Dense, walkable neighborhoods invite residents to shop and do errands on foot, potentially reducing travel by car. When these communities are centered around public transit services that can transport residents to more distant jobs and other destinations, the air quality benefits are multiplied. Under current growth trends, a continued Bay Area housing shortfall will require up to 265,000 workers (and their families) to live in outlying areas and commute to jobs within the region. These people will commute long distances, primarily in singleoccupant vehicles. The smart growth scenario, on the other hand, provides enough transit-accessible housing within the region to accommodate Bay Area workers who otherwise would have to live in distant towns and commute from afar. Providing more housing in the region — built in transit-rich, walkable neighborhoods — is expected to result in about the same air quality within the Bay Area as the base case, even while accommodating these additional households.

SMART GROWTH STRATEGY REGIONAL LIVABILITY FOOTPRINT PROJECT

#### Water

Water is a precious and finite resource in the Bay Area. We import much of it from the northern reaches of California and the Sierra, and past drought years have required significant conservation to ensure an adequate water supply for all our needs.

#### CASE STUDY

Under the current trends base case, Santa Clara County will add 17 percent more housing units and 21 percent more jobs over 2000 levels. The Santa Clara Valley Water District\* estimates that this will result in a 14 percent increase in water consumption, or 46 million additional gallons. By contrast, the smart growth scenario developed by Santa Clara County workshop participants shows 30 percent more housing and 20 percent more jobs than 2000 levels. Despite much more household growth than the base case, the Water District estimates a 4 percent, or 15 million gallons per day, additional increase in water use. Slightly fewer new jobs are, in part, responsible for this modest increase in Santa Clara County water demand. More credit, however, goes to the compact development pattern and greater reliance on multi-family housing in the smart growth scenario. Typically, less landscaping per housing unit surrounds these development types than is commonplace with the single-family development prevalent in the current trends base case.

A complete answer to the water supply question is more complex than this "back-of-the-envelope" analysis suggests, since the impact on water supply infrastructure is currently unknown. For instance, some retail water agencies may have to provide additional water to specific locations and their existing facilities may or may not be adequate to meet the needs in certain portions of their service areas.

\*The county's wholesale water supply agency

Water utilities and engineers are constantly searching for new sources for the region, and continually monitoring and conserving our water supply is a way of life in the Bay Area. Smart growth can't change the fact that each new job or household requires water to serve it. In fact, with the interconnected nature of the state's water system, new development just about anywhere in California affects the same overall water supply.

But smart growth can help communities minimize water use. In the Bay Area, new development in cooler areas near the Bay requires less water than new development in hotter inland areas. The combination of compact development and more townhouses, condominiums and apartments also reduces water demand by calling for less landscaping. Currently, each residential unit in the Bay Area uses an average of 300 gallons of water per day. Under the base case, this rate is likely to continue for new development; it might even increase since new development is projected to be primarily in hotter inland areas and to be composed of single-family homes. The smart growth scenario developed by workshop participants emphasizes development in cooler, Bay-side parts of the region, and in multi-family units. This combination of changes is expected to result in a 17 percent reduction in water consumption — down to an average 250 gallons a day — in new housing units.

#### **Future Research**

The case study at left begins a discussion about the relationship between smart growth and water demand. Future work is needed to estimate the change in demand as a result of smarter growth patterns and future pipeline and storage requirements throughout the region. Work also is needed to identify the specific regulatory changes and incentives needed — such as funding for infrastructure to allow widespread use of recycled water for nonpotable use — to promote water conservation and increase supplies.

#### SMART GROWTH PROJECTIONS

The land-use scenario developed by workshop participants shows specific numbers of new housing units and jobs — as well as the types and locations of new development and areas to be protected as open space and agricultural land. The same information also is being used by ABAG as the *starting point* for a new set of regionwide, policybased growth projections.

project website for review planning/smartgrowth.) It also is important to recognize that a series of incentives and regulatory changes, such as those discussed The specifics of the smart growth may change in the future as ABAG seeks public comment and input from local governments in the process of developing these policybased projections. (Please see opportunities: www.abag.ca.gov/ beginning on page 13, are critical variables in estimating an alterscenario analyzed in this chapter native future.

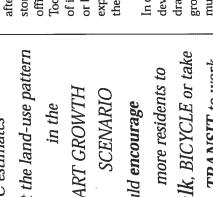
#### TRANSPORTATION

that the land-use pattern than the base case. walk, BICYCLE or take **TRANSIT** to work more residents to SMART GROWTH SCENARIO in the would encourage MTC estimates

#### Percent of new development near rail or frequent bus service PROXIMITY OF NEW HOUSING AND JOBS TO EXISTING TRANSIT

60% F 50% 40%

30% 20% 10%



of its jobs are within convenient walking distance of a rail station or bus stop with frequent service. Since little new development is stores and offices segregated from each other; developers and loday, only about a quarter of the region's residences and a third expected in already-developed areas, if current trends continue, Most of the Bay Area, like many U.S. metropolitan regions, grew after World War II with spread-out communities of housing, officials assumed that people would drive from place to place. these figures are likely to shrink.

development would be near frequent public transit service. This In contrast, under the smart growth scenario, fully half of all new dramatic improvement reflects a common theme of the smart growth scenario: New development in compact, mixed-use communities near high-quality public transportation.

use pattern in the final smart growth scenario developed by workshop participants also would encourage more residents to A comprehensive analysis of the three smart growth alternatives arising out of the first round of workshops, conducted by the Metropolitan Transportation Commission (MTC), projected that all three alternatives would result in more people riding transit, walking and bicycling to their destinations than would the base case growth scenario. (See Alternatives Report, pp. 10-[1]. Based on this earlier analysis, MTC estimates that the landvalk, bicycle or take transit to work than the base case. How can the smart growth scenario — which houses many more workers within the region than the base case — allow people to rent trends continue, there will be no change from today in the percentage of trips using public transportation. Under the smart travel less by car? By locating more jobs and housing where many short trips can be made on foot and longer ones by transit. If curgrowth scenario, MTC estimates the number of public transit riders to increase by one third over current levels.

#### Congestion

total trips — would be only slightly higher than in the base case despite the fact that it provides housing for a quarter million MTC further estimates that the total number of vehicle miles traveled in the smart growth scenario — both for work trips and more residents than the base case. Furthermore, average commute speeds are expected to be about the same as in the base case, However, localized traffic congestion could worsen in areas with indicating that peak hour traffic would not be any worse. intensive new infill development.

#### Auto Ownership

low-income families, it follows that more Bay Area residents own fewer cars? Typically, there is a strong correlation between el by automobile. Since the smart growth scenario calls for a tremendous amount of new housing affordable to very low- and would be riding public transit as a result of income alone. (Note: There are some important Bay Area exceptions to this rule of With many more people riding transit, bicycling and walking, does this mean that households in this smart growth future will household income and auto ownership and the amount of travthumb. In some of today's densest and most upscale neighborhoods, many households rely on public transit, despite being able to afford owning and operating a car.)

ership, MTC's analysis assumes a distribution of household income In order to isolate the effect of smart growth on public transit ridregionwide similar to that expected in the current trends base case.

to the base case in which the number and share of households decades. This, again, reflects the large numbers of new housing Using this assumption, MTC finds a significant increase in the proportion of households with zero automobiles, in contrast with no automobiles is expected to decrease over the next two units and jobs in central areas, well served by public transit, that are included in the smart growth scenario.

1003) 11 (2003) mart Growth

Housing

SMART GROWTH STRATEGY REGIONAL LIVABILITY FOOTPRINT PROJECT

#### HOUSING

#### Affordable Housing

Housing in the Bay Area currently ranks as the most expensive in the nation, and despite an economic downturn, housing prices continue to climb! While existing homeowners may welcome the ing has a negative effect on the region's economy and is skewing its demographics. Companies that cannot attract employees to relocate to the Bay Area consider moving to other parts of the state or nation where housing is less expensive. Young people who are priced out of the housing market here decide to move to Teachers, police officers, firefighters, librarians, medical workers and every Bay Area community find that their incomes do not go far enough toward buying or renting a place to live in the and many other professionals essential to the welfare of each Bay Area. The situation is even bleaker for very low- and lowescalating value of their homes, the ever-increasing cost of housareas where they can buy homes and raise their families. income families and people without stable incomes.

supply of housing has driven prices up for everyone. Middleand particularly not enough affordable housing. The underincome households outbid lower income households for The Bay Area has not been building enough housing in general,

DEPENDING NONCLICIT DIMENTE (1 WACE CADICO)	
PERSON MEDIAN HUUSENULU INCOME (I TRAVE EARNER)	\$64,000
Yery Low Income: (less than 50% of median)	
Child Care Worker	\$20,000
Retail Salesperson	\$23,500
Truck Delivery Driver	\$27,600
Medical Assistant	\$27,900
Low Income: (50% – 80% of median)	
Emergency Dispatcher	\$41,800
Elementary School Teacher	\$48,000
Fire Fighter	\$50,300
Loan Officer	\$50,800
Moderate Income: (80% –100% of median)	
Computer Support Specialist	\$55,200
Landscape Architect	\$56,100
Police Patrol Officer	\$63,600
Registered Nurse	\$63,800

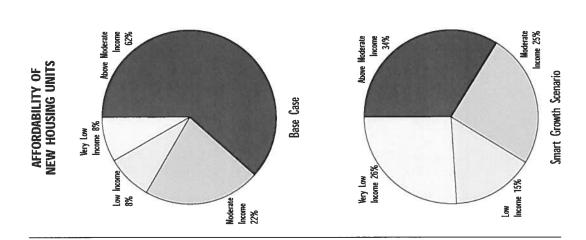
modest units, and wealthier households outbid everyone else for housing originally built for middle-income residents. From 1988 to 1998, the Bay Area produced 251,000 housing units --- enough for 375,000 workers --- while the number of jobs increased by nearly 500,000, forcing thousands of workers and erate-income families, while almost twice that many units were their families to seek housing outside the region. Of these units, only about 100,000 were affordable for very low-, low- and modneeded for these segments of the population.

Involvement of both for-profit and nonprofit homebuilders in the An increase in the total supply of housing, including apartments, condominiums, and rental and owner-occupied houses, is critical for the economic stability and overall well-being of the region. smart growth process is vital to determining how to increase the production and affordability of housing. Without government assistance and subsidies, however, housing affordable to low- and very low-income households likely will remain unobtainable.

housing units than the base case. This alternative growth scenario The smart growth scenario developed by workshop participants calls for construction over the next 20 years of 340,000 more outpacing current trends in affordable housing production. In recent years, the Bay Area averaged only 23,000 new housing units per year, with 16 percent of them affordable to lower also greatly increases the proportion of new housing affordable to very low- and low-income households -- 41 percent -- far income families.

pants, new incentives and regulatory changes will be needed to developers from supporting or building residential, mixed-use and compact development. In addition, special incentives will be To meet the housing goals of smart growth workshop particicounteract existing forces that discourage local governments and needed to provide the levels of very low- and low-income housing envisioned by participants.

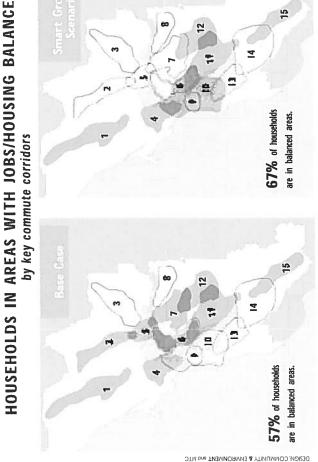
<sup>1</sup> "Cost of Land Drives Home Prices," San Jose Mercury News, August 4, 2002.



SMART GROWTH STRATEGY REGIONAL LEVABILITY FOOTPRINT PROJECT

## **JOBS/HOUSING ANALYSIS AREAS**

- Central Sonoma County Heaktsburg to Petaluma along Highway 101. Includes Sebastopol along Highway 12 and Highway 116 corridors.
- atong Highway 29 through the Napa Valley. Includes 2. Napa County Calistoga to American Canyon Angwin and Pope Valley, northeast of St. Hetena.
- 3. Central Solano County Dixon through Cordelia along 1-80.
- 4. Marin County Novato through Sausalito along Highway 101. Sir Francis Drake Boulevard through Lagunitas, Includes most of urbanized Marin County.
- Benicia and western Contra Costa County, centered 5. Carquinez Strait American Canyon, Vallejo, around Carquinez Strait and along San Pablo Bay.
- 6. Western Contra Costa/N. Alameda Crockett through Oakland and Alameda along I-80. along the east shore of San Francisco Bay.
- Concord and Pleasant Hill at core. Danville and Błackhawk through Martinez along 1-680. Lafayette, Moraga and Orinda atong Highway 24. Also includes 7. Central Contra Costa Walnut Creek,
- 8. Eastern Contra Costa Martinez through Brentwood along Highway 4.
- 9. San Francisco Includes only the city.
- San Francisco to San Rafael (Marin County), San Leandro (Alameda County) and Belmont, Foster City 10. Greater San Francisco Radiates out from and Pacifica (San Mateo County).
- 11. Central/Southern Alameda Oakland San Francisco Bay. Also extends along 1-580 & through Milpitas on I-880 along east shore of 1-680 corridors through Dublin and Pleasanton.
- 12. Tri-Valley Alamo to Pleasanton on 1-680. Also extends to Livermore along 1-580.
- 13. San Mateo San Francisco International Airport and Millbrae through Palo Alto along Highway 101 Includes the hills of Woodside and Portola Valley.
- 14. Silicon Valley Northern borders of Santa Clara County (including Palo Atto and Milpitas) through San Jose, including Coyote Valley.
- 15. Southern Santa Clara County Downtown San Jose to Gilroy along Highway 101.



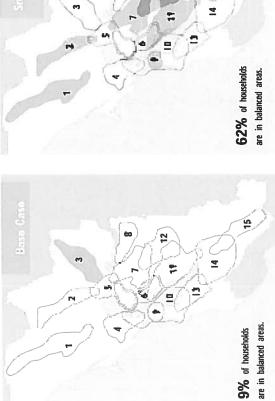
éð

4

# HOUSEHOLDS IN AREAS WITH NEW JOB PAY MATCHED TO NEW HOUSING COST by key commute corridors

2

4



12

#### MAPS

at the top compare total units of comparison, under the base cent of households would be in around the Bay Area. The maps 2020 in each of the commute areas. Under the smart growth scenario, an impressive 67 percent of Bay Area households would be in areas with a balance of workers and jobs (assuming case (which perpetuates current These maps illustrate 15 key corridors or commute areas housing to total jobs in the year 1.5 workers per household). By growth patterns) only 57 perbalanced areas.

of new housing in each area. The providing a match of new housscales of new jobs and the cost with the smart growth scenario ing costs and local incomes for 62 percent of new households, such a match in just 9 percent of The second pair of maps looks at the match between the pay differences here are more stark, while the base case achieves households.

of households are in balance/ Areas where at least 85 percent match are coded blue.

S

-	
<u>د الا</u>	
ě.	
-	
~	
- 21	
100	
- 22	
20	
- 13	
7	
20	
2	
<b>1</b>	
8	
5	
X	
•	
-	
- 81	
1990	
24	
100	
2	
-	
E LIVAB	
<	
2	
S	
õ	
NOH	
GION	
<b>BGION</b>	
<b>HGION</b>	
KEGION	
REGIONA	
REGION	
V REGION	
GY REGION	
<b>GY REGION</b>	
TEGY REGION	
TEGY REGION	
VIEGY REGION	
ATTEGY REGION	
RATEGY REGION	
<b>TRATEGY REGION</b>	
TRATEGY REGION	
STRATEGY REGION	
STRATEGY REGION	
I STRAITEGY REGION	
TI STRATEGY REGION	
TH STRATEGY REGION	
VTH STRATEGY REGION	
WTH STRATEGY REGION	
WTH STRATEGY REGION	
OWTH STRATEGY REGION	
ROWTH STRATEGY REGION	
ROWTH STRATEGY REGION	
<b>GROWTH STRATEGY REGION</b>	
GROWTH STRATEGY REGION	
GROWTH STRATEGY REGION	
T GROWTH STRATEGY REGION	
RI GROWTH STRATEGY REGION	
<b>RT GROWTH STRATEGY REGION</b>	
ART GROWTH STRATEGY REGION	
IART GROWTH STRATEGY REGION	
MART GROWTH STRATEGY REGION	
SMART GROWTH STRATEGY REGION	
SMART GROWTH STRATEGY REGION	

#### Jobs and Housing

At its core, smart growth is about providing sufficient housing in the right place (i.e., close to jobs and/or public transit nodes) and at the right price, with a mix of units appropriate to residents' income levels and needs. The quartet of maps to the left tells a story about how the smart growth scenario sketched out by workshop participants would shift the region's housing equation to better align housing supply and demand.

# The Balance Between Jobs and Housing

Some people believe that the solution to the Bay Area's chronic and worsening commute traffic is a better balance of jobs and housing. According to this theory, if all our communities had sufficient housing for their workers, then enough people could live within a short drive or walking or biking distance of their jobs to put a dent in congestion. To assess the relationship between jobs and housing, this analysis looks at 15 overlapping commute areas (see maps on page 24). Each is oriented around one or more existing job centers and extends to include housing within about a half-hour commute or less, by any mode. An analysis area is considered to have an acceptable balance if the number of jobs and employed residents within that area are within 15 percent of each other. Because jobs/housing issues are complicated, two different types of jobs/housing relationships are assessed. First is the relationship between the total of future jobs and housing units in each analysis area, including existing and future growth. Second is the relationship between new jobs and new housing.

#### A Look at the Totals

One school of thought says that smart growth efforts must improve the balance of total jobs and housing in each community. Therefore, unless we create communities with overall jobs/housing balances, we will perpetuate current conditions in which many Bay Area residents have to drive long distances to work. Because of its dispersed development patterns, the current trends base case would result in a balance of total jobs and housing in

nine of the 15 analysis areas — accounting for just 57 percent of Bay Area residents — in 2020. The base case's strong job growth without companion housing growth to support it is responsible for this low number.

By contrast, the smart growth scenario would result in a total balance of jobs and housing for 67 percent of Bay Area house-holds. Almost 20 percent more people would live in a "balanced" area under the smart growth scenario than under the base case because of the greater proximity of new housing to employment centers and increased interest in mixed-use development.

#### Focusing on New Growth

Another school of thought contends that striving for a total balance of jobs and housing is neither realistic nor advisable. Given that current Bay Area residents already have their jobs and homes, proponents of this line of thinking suggest that it is more important to try to balance job and housing growth only in new development. Looking at the relationship between new jobs and housing also makes it possible to add another dimension to the analysis: jobs/housing match. An analysis of match considers how the cost of new housing available in each area compares to the pay scales of new jobs in the same area. Such an analysis is not meaningful when assessing total jobs and housing supply, since the Bay Area's current housing prices preclude a match between housing costs and incomes in most markets. But it is possible to see whether the projected incomes from new local jobs would be high enough to allow new workers and their families to afford new nearby housing.

Under current trends, there would be a very poor match between future jobs and housing. Development, under the current trends base case would lead to a match of new housing costs and local incomes in just one analysis area, accounting for only 9 percent of the total household growth projected under the base case.

nearby workers.

Under the smart growth scenario, the picture improves dramatically. There would be an acceptable match of new jobs and new housing in seven of the analysis areas, incorporating 62 percent of all new households.

#### Just 9 percent of new housing in the BASE CASE would be **affordable** to new nearby workers. Under the

to new nearby workers. Under the SMART GROWTH SCENARIO, the picture improves dramatically: **62 percent** of new households would be AFFORDABLE to new

FOOTFRINT PROJ	
2	
FA .	
- 6	
100	
H	
7	
22	
S	
4	
0	
÷.,	
100	
Sec.	
C	
EC.	
LIVABILITY	
<	
2	
-	
-	
1	
59	
Z	
$\mathbf{n}$	
2	
610	
BGIO	
<b>BGIO</b>	
REGIO	
REGIONAL	
N REGIO	
GY REGIO	
EGY REGIO	
TEGY REGIO	
ATEGY REGIO	
RATEGY REGIO	
IRATEGY REGIO	
STRATEGY REGIO	
STRATEGY REGIO	
I STRATEGY REGIO	
TI STRATEGY REGIO	
TH STRATEGY REGIO	
WTH STRATEGY REGIO	
WTH STRATEGY REGIO	
OWTH STRATEGY REGIO	
ROWTH STRATEGY REGIO	
<b>GROWTH STRATEGY REGIO</b>	
GROWTH STRATEGY REGIO	
J GROWTH STRATEGY REGIO	
RT GROWTH STRATEGY REGIO	
ART GROWTH STRATEGY REGIO	
IART GROWTH STRATEGY REGIO	
MART GROWTH STRATEGY REGIO	
SMART GROWTH STRATEGY REGIO	

S

The SMART GROWTH SCENARIO Envisions a **46 percent increase in the region's most** *in the region's most impoverished communities communities that of the* 



# SOCIAL AND ECONOMIC EQUITY

Social equity within the smart growth framework means that people of all income levels have access to good schools and various types of employment. It means that low-income residents in particular benefit from new investment in their communities and have access to affordable housing and reliable transportation. Social equity gives all individuals access to economic opportunities, mitigates displacement caused by rapidly increasing housing costs, and promotes active engagement and participation by all residents in community planning efforts. Under both the current trends base case and the smart growth scenario, the Bay Area's population and job growth will present challenges and opportunities for lower income communities, and for making housing, services and employment available to residents of impoverished neighborhoods throughout the region. Smart growth strategies have the potential to reduce some of the current inequities in these areas. If not managed well, however, smart growth could trigger changes that disrupt communities and lead to increased displacement, and more economic and social isolation.

base case.

To assess these issues, growth envisioned under the smart growth scenario in impoverished communities throughout the Bay Area was compared to growth expected in these neighborhoods if current trends continue. A community is considered impoverished if the median household income is less than 80 percent of the county median income. This analysis looks at a total of 38 such communities, which are spread throughout the nine-county Bay Area. (See map page 27.)

# **Growth Patterns in Impoverished Communities**

The population and job growth rates of Bay Area impoverished communities show major differences between the base case and the smart growth scenario, particularly in household growth. Under the base case, the number of households in the region's most impoverished communities would grow by only 15 percent

through 2020, and employment by 24 percent. In contrast, the smart growth scenario envisions a 46 percent increase in housing — more than three times that of the base case — and a 32 percent increase in jobs by 2020.

If managed well, the sizable increases in household and job growth foreseen for impoverished areas would provide a significant opportunity to create healthy, diverse, mixed-income communities and give low-income residents access to quality affordable housing.

#### Job Skill Level

Unless residents have needed job skills, however, providing more jobs in the region's impoverished communities will not help improve standards of living, even if wages are high enough to cover local housing costs. Over recent decades, there has been a decline in traditional high-paying manufacturing employment and a stronger focus on the information-based "new economy." In the next 20 years, most jobs commanding incomes sufficient to raise a family above the poverty level will continue to require high levels of education and job skills, regardless of the pattern in which growth occurs.

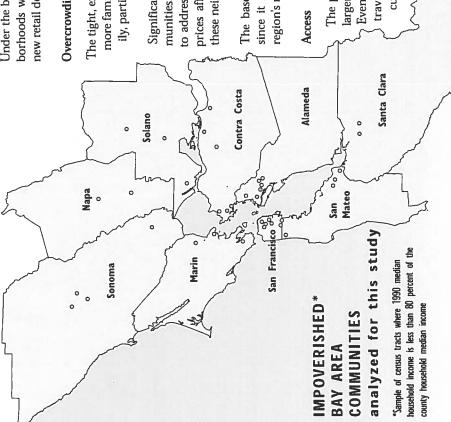
Local workers in impoverished communities may not qualify for new jobs in their areas without aggressive job training and economic development programs. Thus training and education must be part of any smart growth scenario.

#### **Commercial Services**

The region's impoverished communities have far fewer retail establishments than their demographics would suggest they can support. The lack of retail stores means that more money than necessary leaves these neighborhoods; residents need to travel long distances to meet their basic shopping needs; and few local retail jobs and businesses are created as a result of residents' spending. Even in impoverished communities that are wellserved by public transit, it is often difficult to carry groceries, take children to childcare and run other errands on the bus or train.

26

SMART GROWTH STRATEGY REGIONAL LIVABILITY FOOTPRINT PROJECT



ing the proportion of relatively higher income residents in these would contribute to a stronger market for many goods and The smart growth scenario would strengthen the ability of lowincome communities to support services by increasing residential densities, boosting the number of nearby workers, and expandareas. All three factors — density, employees and income-mix services, which in turn would attract retailers.

borhoods would change much less, creating little impetus for Under the base case, existing conditions in impoverished neighnew retail development.

#### Overcrowding

The tight, expensive Bay Area housing market has forced two or more families to share housing units designed for a single family, particularly in the region's low-income neighborhoods.

to address this issue, provided that new units are offered at prices affordable to people living in overcrowded units in munities, as foreseen in the smart growth scenario, can help Significant new housing construction in low-income comthese neighborhoods. The base case has less capability to address overcrowding since it includes far less new housing development in the region's most impoverished areas.

larger region is another key issue in planning for equity. Even though impoverished communities are often transit accessibility can prevent lower income The physical access of residents to employment and the traversed by major mass transit routes, many are currently lacking adequate transit service, especially during reverse commutes and off-peak hours. Poor residents from reaching jobs for which they are qualified.

areas. A concerted effort would be required to ensure more would bring a potential increase in the number of transit riders and thus encourage bus and rail operators to add service in these Increases in residential densities in impoverished communities transportation options, since without them, impoverished communities will remain isolated, with potentially even more underserved residents.

STAGNATION of offers significantly result in FURTHER for economic revitalization than the SCENARIO, The base case less opportunity SMART GROWTH these communities. AND could



The substantial **growth** in the region's IMPOVERISHED COMMUNITIES proposed in the proposed in the smart growth scenario can lead to important can lead to important new opportunities in housing, retail services

# Displacement and Neighborhood Change

As noted above, the substantial growth in the region's impoverished communities proposed in the smart growth scenario can lead to important new opportunities in housing, retail services and transit. But if this growth is not well managed, it could lead to displacement and instability. Lower income renters and businesses in neighborhoods that currently have relatively affordable building stock and access to downtown districts are the most likely to experience displacement as higher income renters and businesses move in. Programs to minimize displacement must be included in any smart growth scenario. Much less growth would occur in low-income communities in the base case than in the smart growth scenario. Therefore, residents and businesses would feel less displacement pressure. At the same time, the base case offers significantly less opportunity for economic revitalization, and could result in further stagnation of these communities.

#### **Capitalizing on Change**

In order to capitalize on opportunities to revitalize lower income communities, while also discouraging displacement, the smart growth scenario relies on parallel strategies for reinvestment and affordability. Here are some of the policies that residents of these communities believe could help bring about needed improvements:

 Train and educate local residents to help them qualify for new, local jobs.

and transit.

- Develop new jobs in low-income communities that are targeted to the current skill levels of local residents.
- Increase transit-oriented development and alternatives to single-occupant auto travel to improve access to new and existing jobs and services throughout the region.

- Provide new business opportunities in low-income neighborhoods targeted to local firms and residents.
- Build affordable housing throughout the region to avoid concentration in impoverished communities.
- Address current overcrowded conditions by giving existing residents priority for new units in a given neighborhood.
- Maintain affordability of existing housing through methods such as new financing for long-term subsidies set to expire soon.

# **DEVELOPMENT FEASIBILITY**

Smart growth will not occur easily. Land supply, market forces and local regulations all have the potential to stand in the way of new kinds of development and growth patterns.

This section estimates how "doable" the smart growth scenario might be, and the previous chapter (beginning on page 13) lists incentives, regulatory changes and other public policy changes identified by workshop participants that might help to make any smart growth dream a reality.

#### Marketability

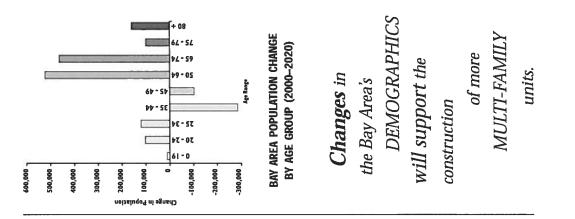
Today, about 62 percent of Bay Area housing consists of singlefamily homes. Single-family homes made up a slightly higher proportion — two-thirds — of housing built in the region in the 1990s, though this trend varied considerably by county. More than 87 percent of new Solano County housing units fit this description, while only half in Santa Clara County and just 10 percent of new housing in San Francisco were single-family homes. If current trends continue, two-thirds of the new housing units expected to be constructed in the region through 2020 also will be single-family, distributed by county in similar proportions to those in recent history. The smart growth scenario drawn up by workshop participants reverses this trend, with 66 percent of new housing to be built as townhouses, condominiums and apartments and 34 percent as single-family homes. Adding units in these proportions would slightly alter the total regional housing stock mix by 2020, from 62 percent to 57 percent single family.

Under the smart growth scenario the changes in new housing types in eight of the region's nine counties would be substantial, as local communities strive to provide sufficient housing for a growing population on a limited supply of available land.

The higher level of multi-family units in the smart growth scenario compared to the base case raises some important

questions. Would people in the Bay Area flock to multi-family and attached housing? Or will hordes of Bay Area commuters continue to migrate to the Central Valley in pursuit of the American dream of owning a single-family home with a big back yard? In a 2000 survey, the Home Builders Association (HBA) of Northern California found that 43 percent of shoppers looking for a home in single-family subdivisions were "mainly considering a single-family home."<sup>11</sup> Yet in the same survey, 42 percent of potential home buyers said they would be willing to buy a higher density, attached housing unit if it meant living near their work, and it cost no more than a conventional single-family home in an outlying area. This same interest in more compact housing types in exchange for a shorter commute has been found in studies conducted for downtown Oakland and downtown San Francisco, particularly among young, single workers and "empty nesters."<sup>2</sup>

On a national level, too, acceptance of smart growth design principles, such as smaller lots and more compact development, is growing. One study of 2,000 buyers of both newly constructed and resale homes noted, "Often what buyers want is NOT what they get. One of the main reasons behind this is that they couldn't find what they wanted in their markets."<sup>3</sup> This study found that homebuyers wanted less sprawl and more "small town," pedestrian-oriented shopping and gathering places. Changes in the Bay Area's demographics also may support the construction of more multi-family units. Household types, such as young singles, childless couples, "empty nesters" and the elderly, tend to be attracted to urban infill housing. These groups are expanding in the Bay Area, which is expected to undergo a dramatic change in its age composition in the next 20 years. As shown on the chart to the right, the 20- to 24-year-old and 55-and-over population groups together are expected to increase by over 1.2 million people in the next 20 years. Both have relatively high proportions of people who are interested in small units, senior and and other types of infill housing.





If current patterns continue, TWO-THIRDS of new housing built by 2020 would be SINGLE-FAMILY... ... The Smart growth scenario proposes to reverse that trend, with townhouses, condos and apartments making up two-thirds of new units.



These trends, taken together, suggest that there could be increasing market demand for the types of housing foreseen in the smart growth scenario developed by workshop participants. As stated in a national study of future housing demand, "Since the driving force for the future is age-based growth of households that have largely completed child-rearing, the residential future of cities may well depend on how they appeal to people in life's later stages."<sup>4</sup>

#### **Available Land Supply**

During the Smart Growth Strategy/Regional Livability Footprint workshops, participants were encouraged to envision future Bay Area development patterns over a 20-year period without explicit regard for whether new development would fit on current vacant lands. Instead, participants placed development on lands they considered appropriate for either development or redevelopment over the next 20 years. But, since the smart growth scenario envisions a variety of building types in each place, many existing structures would be consistent with the vision of workshop participants. An analysis of the smart growth scenario compared the proposed development patterns and densities desired by workshop participants in each planning area to the amount of vacant land, according to county assessor parcel data published by Metroscan. The goal of this "fit" analysis was to determine the number of acres that would need to be redeveloped to accommodate the smart growth scenario. The analysis assumed that new growth in each planning area would first occur on vacant land, and that other land in each planning area would be redeveloped to accommodate the smart growth scenario. The analysis assumed that new growth in each planning area would first occur on vacant land, and that other land in each planning growth.

The "fit" analysis found that the smart growth scenario, depending on the density of development, would require the redevelopment of approximately 48,000 acres. By contrast the base case would require almost no redevelopment, since it presumes that most new growth will take place on currently undeveloped sites.

Redevelopment sites generally contain underutilized and older buildings. They typically occur along older transportation corridors, in obsolete industrial areas or on large surplus sites such as the Alameda Naval Air Station and San Francisco's Mission Bay. Over the 20-year planning horizon, the redevelopment foreseen in the smart growth scenario would require about 2,400 acres per year. While this level of redevelopment is ambitious, it also may be quite feasible, given that redevelopment projects are common throughout the region and that it amounts to just 0.3 percent of currently urbanized land (or 5 percent over 20 years). However, it might exceed the capacity of the marketplace, and will likely face resistance in some areas from "NIMBYs" proponents of Not In My Back Yard — who oppose change in their communities. Beginning on page 13, the Incentives chapter of this report discusses policies and regulatory changes that might help to address these issues.

#### **Financial Feasibility**

It will take more for smart growth to succeed than interested buyers and enough building sites. In order for developers to build compact, infill and transit-oriented development, it needs to be financially feasible. Both for-profit and nonprofit developers must make their projects "pencil out" if they are to build them. Government subsidies can help in some cases to make ends meet, but in the long run, infill development costs (including a reasonable profit) cannot exceed the rent or purchase price that future residents will be willing and able to pay. The financial feasibility of new development in the region will vary substantially depending on a host of factors, including location, timing, national economic trends, local market conditions, land prices, construction costs, local regulations, and the financial requirements of developers and investors. Due to the complexity and variability of each of these factors, this analysis does not look at the financial returns of future development projects. However, all of the types of development in the smart

growth scenario are based on multiple real-world examples from the Bay Area, many of which were recently constructed, suggesting that, at least under some conditions, the development foreseen in the smart growth scenario can be financially feasible. Since the base case anticipates that most new growth will occur on currently undeveloped sites, it would result in more largescale development projects and create lesser financial challenges for a developer than the smart growth scenario, which primarily calls for development to occur in already-developed areas. If there is no change in the current mix of rewards and incentives for development, smart growth development will be more difficult to achieve than the base case, due to its reliance on more expensive, already-developed sites.



<sup>2</sup> Old Town Square Market Feasibility Study (BAE 1997), and Demand for Downtown Housing in South San Francisco (BAE 2000).

<sup>3</sup> Community Preferences: What the Buyers Really Want in Design, Features, and Amenities (American LIVES, Inc., 1999).

<sup>4</sup> The Implications of Changing U.S. Demographics for Housing Choice and Location in Cities (Martha Farnsworth Riche for the Brookings Institution, 2001).



The challenge is to make COMPACT, infill and TRANSIT-ORIENTED development FINANCIALLY FINANCIALLY FEASIBLE for builders.

## The Colors of Growth

Opposite is a pull-out poster with two views of how the Bay Area could evolve between now and the year 2020. On the left is a map depicting the smart growth scenario showcased in this report. On the right is a map of the current trends base case, inviting a comparison between a continuation of "business as usual" development patterns versus a turn toward a smarter future. On both maps, the current footprint of development appears as light gray. A light sprinkling of dots on the smart growth map indicates areas that would remain largely intact but where minor changes would occur — such as a 5 percent density increase, much of that attributable to the addition of granny units to single-family homes. On the map depicting the smart growth scenario, three color families mark significant new development of various types (see keys). What distinguishes one color family from the next is the degree of emphasis on housing versus the emphasis on jobs. In fact, the three color families together represent a

continuum. Various shades of brown are reserved for new residential neighborhoods, which, by definition, incorporate very little employment. At the other end of the spectrum are various shades of purple, which designate new employment centers, educational institutions and other uses that for the most part exclude housing. In the middle of the jobs/housing continuum fall various shades of red, which signify mixed-use and town center development. Within all three color groupings, the darker the shade, the higher the density of that particular type of development. Look closely at the two maps — smart growth on the left vs. base case on the right — and you'll begin to see how a turn toward a smarter future will rein in the footprint of development in the nine-county San Francisco Bay Area. By dialing up the density in central cities, town centers and around transit hubs via infill development, the Bay Area has an opportunity to protect valuable agricultural lands and irreplaceable natural assets at the region's fringes.

Project Web site: www.abag.ca.gov/planning/smartgrowth/maps.html

Project Manager           ommunity Development           Development           Victoria Eisen, ABAG           om Valley           Marjorie Blackwell, principal author           Marjorie Blackwell, principal author           nidation           Bation           Marjorie Blackwell, principal author           Victoria Eisen, ABAG, editor           Marjorie Blackwell, principal author           Victoria Eisen, ABAG, editor           Derick Duffy, Michael Houston, Gerry Raycraft, ABAG           Menori, Tansportation and Land Use Coalition           Peter Albert, Val Menoti, John Nemeth, BAKT           Nundation           Reta Goode, MTC, associate editor           Technical Review           Nagnore Rathin           Nation           Peter Albert, Val Menoti, John Nemeth, BAKT           Nundation           Reta Goode, MTC, associate editor           Agency           Inter Ellis, Urban Habitat Program           Mundation           Retarch Duffy, Michael Houston, Gerry Raycraft, ABG           Inter Risk           Agency           Accentize Rathy Mittae, Bay Rea Council           Prever Albitist Program           Retary Shorthere Randy Antaway           Kori
Additional Project Sponsors California 2000 Project California 2000 Project Calif Dept. of Housing and Community Development Columbia Foundation: Silicon Valley David and Lucile Packard Foundation Exelyn & Walter Haas, Jr. Fund The James Irvine Foundation East Bay Community Foundation East Bay Community Foundation East Bay Community Foundation East Bay Community Foundation Marin Community Foundation San Francisco Foundation Peninsula Community Foundation San Francisco Foundation U.S. Erwironmental Protection Agency U.S. Geologic Survey William and Flora Hewlett Foundation Regional Agencies Smart Growth Steering Committee Walnut Creek City Councilmember Millie Greenberg Napa County Supervisor Mike Rippey Santa Rosa City Councilmember Millie Greenberg Napa County Supervisor Steve Kinsey Suisun City Mayor James Spering Los Gatos City Councilmember Randy Attaway Contra Costa Supervisor Steve Kinsey Suisun City Mayor James Spering Los Gatos City Councilmember Randy Attaway Contra Costa Supervisor Mark DeSaulnier Alameda County Supervisor Steve Kinsey Suisun City Mayor James Spering Los Gatos City Councilmember Randy Attaway Contra Costa Supervisor Mark DeSaulnier Alameda County Supervisor Steve Kinsey Suisun City Mayor James Spering Los Gatos City Councilmember Randy Attaway Contra Costa Supervisor Steve Kinsey Suisun City Mayor James Spering Los Contra Costa Supervisor Steve Kinsey Suisun City Mayor James County Supervisor Steve Kinsey Suisun City Mayor James County Supervisor Steve Kinsey Sume Wright McPeak, President & CEO, Bay Area Cuncil
Sponsoring Organizations Association of Bay Area Governments Metropolitan Transportation Commission Bay Area Air Quality Management District Bay Conservation and Development Commission SF Bay Regional Water Quality Control Board Bay Area Alliance for Sustainable Development Bay Area Alliance for Sustainable Development American Institute of Architects Audubon San Francisco Bay Restoration Program Bay Area Council Bay Area Council Bay Area Council Bay Area Local Initiatives Support Corporation Bay Area Council Bay Area Local Initiatives Support Corporation Bay Area Rapid Transit District Bay Area Council California Council for the Community Orthern California Council for the Community PolicyLink Sierra Club Transportation and Land Use Coalition Urban Land Institute Each countyude public workshop also was co-sponsored by local organizations, listed on the project web site: www.abag.ca.gov/planning/smartgrowth/sponsors.html

ACKNOWLEDGEMENTS

¢

Printed on recycled paper by J.T. Litho, Oakland

For more information: www.abag.ca.gov/planning/smartgrowth e-mail: smartgrowth@abag.ca.gov Smart Growth c/o ABAG P.O. Box 2050 Oakland, CA 94604

1077	
- Plating	
100	
<b>C</b> ]	
1.0	
100	
100	
100	
Contraction of the	
ALC 1	
24	
<b>N C</b>	
1000	
100	
100	
1000	
100	
and and	
1	
1	
K	
6	
LON	
NON	
NOIS	
CION	
CHON	
ECION	
LECION	
RECEON	
REGION	
REGION	
RECTON	
V REGION	
IV REGION	
AV REGION	
GY REGION	
EGY RECEON	
TEGY REGION	
TEGY REGION	
TEGY RECHON	
VIEGY REGION	
ATEGY REGION	
ATTEGY RECEON	
RATEGY REGION	
TRATEGY REGION	
TRATEGY RECEON	
TRATEGY REGION	
STRATEGY RECEON	
STRATEGY RECEIN	
I STRATEGY RECEON	
I STRATEGY RECEIN	
II STRATEGY RECEON	
TI STRATEGY RECEON	
TH STRATEGY REGION	
TH STRATEGY REGION	
VIII STRATEGY RECHON	
WTH STRATEGY REGION	
WTH STRATEGY REGION	
WTH STRATEGY REGION	
OWTH STRATEGY RECEIDING	
<b>IOWTH STRATEGY REGION</b>	
ROWTH STRATEGY RECEON	
ROWTH STRATEGY RECEIVED	
<b>BROWTH STRATEGY RECEIN</b>	
GROWTH STRATEGY RECEIN	
GROWTH STRATEGY RECEIVED	
GROWTH STRATEGY RECEIV	
I GROWTH STRATEGY RECEIN	
IT GROWTH STRATEGY RECEIVED	
RI GROWTH STRATEGY RECEIVING	
RT GROWTH STRATEGY RECEIVING	
ART GROWTH STRATEGY RECEIVED	

R

The social equity advocates. Others came as representatives of and social equity advocates. Others came as representatives of neighborhood groups or out of concern for their children's future. The mix of diverse interests made for lively discussions and negotiations about the pace, character and shape of development in their communities. Using large maps of their county, participants identified promising locations for various types of new development. Their suggestions were then fed into a special computer program that illustrated the impacts of decisions on the county's housing supply, open space, transit accessibility and other measures of livability, and allowed participants to adjust their maps accordingly.

Each county workshop produced up to a dozen schemes for accommodating future growth in a smarter way, with a cumulative total of 100 countywide scenarios for the Bay Area. The project team spent weeks combing through the proposals, searching for common threads and ultimately distilling them into three thematic smart growth alternatives for the region (see box at near right). The team then invited planning officials and business, environmental and social equity leaders from throughout the region's nine counties to review the draft alternatives. Based on this free-flowing discussion, the team made revisions to the draft alternatives to reflect local ideas and concerns.

While offering different visions of a future Bay Area, each of the three alternatives promoted the goals of smart growth. Each included housing for the million new residents expected by 2020, plus housing for workers who otherwise would commute from neighboring counties. Each allowed for expected economic growth, and at the same time, by channeling growth into a more compact and balanced development pattern, consumed less greenfield land than is currently projected.

# THE SMART GROWTH ALTERNATIVES

hen more bs held in hal capac-

The **Central Cities** alternative located compact, walkable, mixed-use and mixed-income development in the region's urban cores (San Francisco, Oakland and San Jose) and in each county's largest city or citles. It also emphasized growth around existing public transit stations and avoided development in outlying areas by concentrating growth in dense, vibrant citles. The Network of Neighborhoods alternative called for development in many of the same locations as the first alternative, but at lower densities. Additional compact, walkable, mixed-use and mixed-income development took place in other existing communities, along an expanded public transit network and on major corridors. This alternative envisioned a rail renaissance, with new and old stations surrounded by a range of diverse types of housing, jobs and services. The Smarter Suburbs alternative proposed compact, walkable, mixed-use and mixed-income development in many of the same places as the first and second alternatives, but at still lower densities. Additional growth occurred at the region's edges at higher densities than the current norm and with a better balance of jobs and housing than is typical of existing or planned new suburbs. Each of these three alternatives represented a departure from the "current trends base case," a term coined to describe the region's future growth if nothing is done to chart a new course. The base case fails to provide sufficient housing for an increased population and workforce, resulting in continued rapid growth in outlying areas, increased long-distance commuting and further environmental degradation. It envisions development focused in edge communities, with residential areas largely segregated from other uses and continued reliance on the automobile as the primary mode of travel.



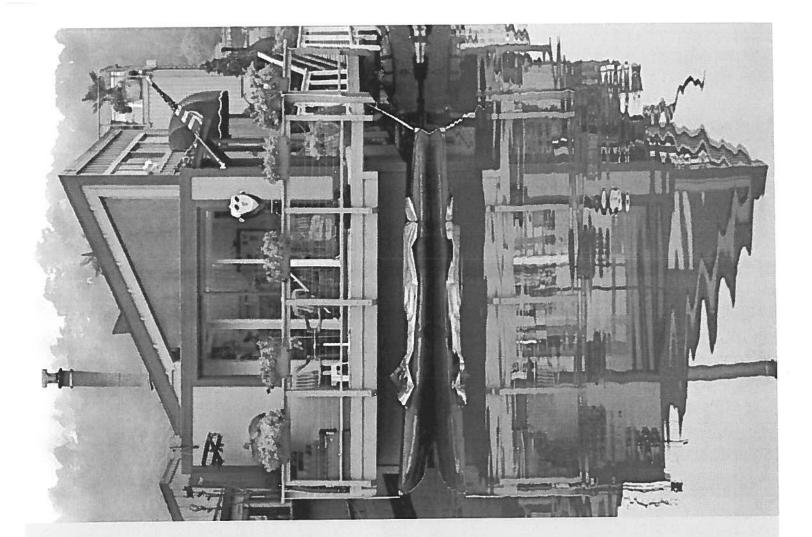
#### PROJECT GOALS

Create a smart growth landuse vision for the Bay Area to minimize sprawl, provide adequate and affordable housing, improve mobility, protect environmental quality and preserve open space. regulatory changes and incentives needed to accomplish these objectives. Develop 20-year land-use and transportation

Identify and advocate for the

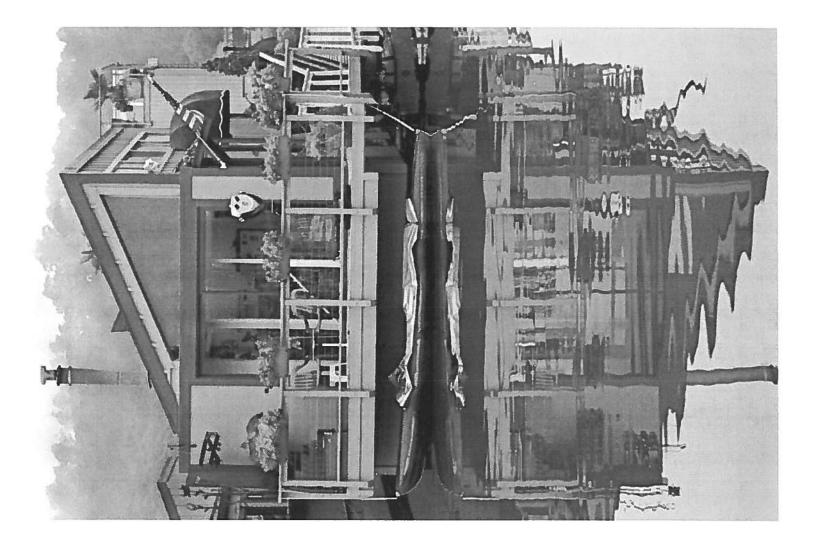
Develop 20-year land-use and transportation projections based on the vision and the likely impact of the new incentives projections that will in turn guide the infrastructure investments of the Metropolitan Transportation Commission and other regional partners.

#### San Francisco Bay Area **HOUSING** Needs Plan 2007-2014



Acknowledgments	
Association of Bay Area Governments	
President	Staff
Rose Jacobs Gibson	Paul Fassinger, Research Director
Supervisor, County of San Mateo	Christy Riviere, Senior Planner Hing Wong, Senior Planner
Vice President	Jason Munkres, Regional Planner Cillion Admer Bonner
Mark Green	ullitati Auarits, negloritati riattitet Michael Smith. GIS Analyst
Mayor, City of Union City	Dayle Farina, Planning Administrative Assistant
Immediate Past President	Cheryl Adsit, Legal Secretary Kathleen Cha. Senior Communications Officer
Dave Contese	Leah Zippert, Communications Officer
vice Mayor, City of San José	Halimah Anderson, Communications Officer
	Thank vou for vour assistance in the success of our RHNA process:
Secretary - Ireasurer	The Housing Methodology Committee
Henry L. Gardner	I inda Wheaton. Housing Policy Division. State Department of Housing and
Executive Director	Community Development
	Glen Campora, Housing Policy Division, State Department of Housing and
Legal Counsel	Community Development
Kenneth Moy	Ted Droettboom, Regional Planning Program Director, Joint Policy Committee
Legal Counsel	
	Association of Bay Area Governments P.O. Bax 2050 Oakland, CA 94604-2050 phone: (510) 464-7900 fax: (510) 464-7970
Front and Inside Cover Photo: "Green with Envy" from Sausalito House Boat Collection, Cynthia Warren. Back Cover Photo: "House in the Clouds" by Roger Wolfendale Except where photo credit noted, photos taken by ABAG staff.	Warren. websie: www.abag.ca.gov ABAC Gatalog Number: P08001PLN Published June 2008

#### San Francisco Bay Area HOUSING Needs Plan 2007-2014



# Table of Contents

- 1 Bay Area Housing Report
- 3 The San Francisco Bay Area
- 11 Projecting Land Use for Transportation Alternatives
- 13 State Housing Element Law
- 15 Bay Area RHNA Schedule
- 17 Determining the Regional Housing Need
- 19 Consistent Objectives & Policies
- 21 Housing Allocation Method
- 22 Housing Methodology Committee
- 33 Income Allocation Method
- 35 Spheres of Influence
- 37 Transfer of Units
- 39 San Mateo Subregion
- 41 Concluding RHNA
- 42 Endnotes
- 43 Appendix A. Bay Area RHNA, 2007-2014



"There's no place like home."

# Bay Area Housing Report

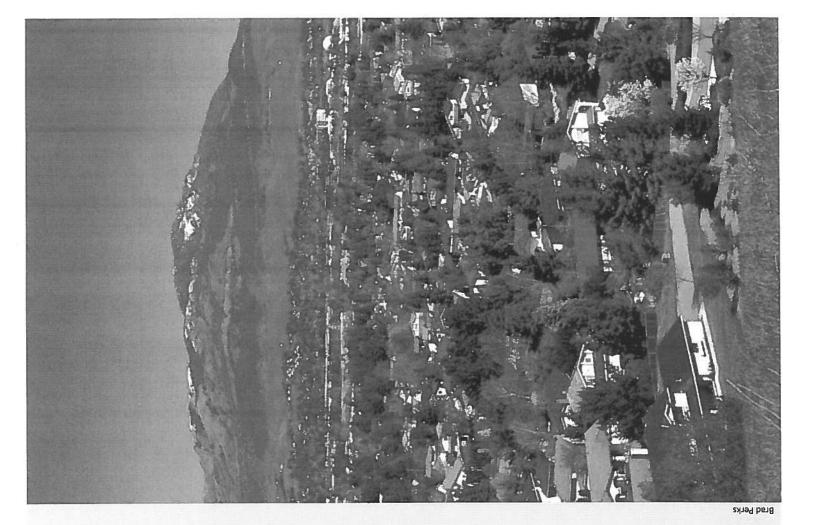
This year's third annual report on housing in the San Francisco Bay Area serves as the 2007-2014 Regional Housing Needs Plan. This plan documents the Regional Housing Needs Allocation (RHNA) for the Bay Area. RHNA is a state mandated process for determining how many housing units, including affordable units, that each community must plan to accomodate.

The State of California's Housing and Community Development Department works with regional Councils of Governments (COGs) to determine the amount of housing needed within the region. The Association of Bay Area Governments (ABAG) is this region's COG. The determination of housing need is based on existing need and estimated population growth. Need is determined for households in all income categories: very-low, low, moderate and above-moderate incomes.

Once the total regional need is determined, ABAC works with local governments and others to allocate the total need to individual cities and counties. Local governments are then required to plan where and how the allocated housing units will be developed within their communities. This is done through the Housing Element of each local government's General Plan.

This year's housing report summarizes current Housing Element Law, documents the process for determining the total regional housing need, describes the allocation methodology and the rationale for each component of the method. This report also provides information on the region's land use forecast, a primary determinant of each jurisdiction's housing allocation.

The regional housing needs allocation for all Bay Area jurisdictions are provided at the end of this report.



Decades of planning and building auto-oriented communities, in places fairly remote from existing job centers have resulted in a region that is highly auto-dependent. During the same time that we pushed development to the far edges of our region, and into neighboring regions like the Central Valley, the number of hours spent

in traffic has grown

by 181 percent.

# The San Francisco Bay Area

Located in Northern California, the San Francisco Bay Area is a 7,000 square mile metropolitan region that surrounds the San Francisco Bay.<sup>1</sup> The Bay Area's nine counties and 101 cities are home to 7.2 million people, making it the fifth most populous metropolitan region in the country.

Approximately 16 percent, or 700,000 acres, of the Bay Area's 4.4 million acres of land are developed for urban use. Sixty-one percent of those urban acres are residential and 42 percent are non-residential employment and retail centers, government buildings, schools, and major infrastructure. San Francisco is the Bay Area's most urbanized county, with 82 percent of its land developed. Napa is the most rural county, having less than four percent of its land area developed. The remaining counties have developed land areas ranging from seven percent to 28 percent.

#### Population

Like many large urban centers, the Bay Area's population will continue to grow. Over the next 25 years, the nine counties of the region are expected to add about 1.6 million new residents, an average of 64,760 new residents per year. About half of this increase in population is due to the difference between births and deaths, or natural increase. The

other half is due to in-migration into the region. People mostly come to the Bay Area for its great job opportunities.

San Francisco, the South Bay and the inner East Bay continue to be the region's most populous areas. Santa Clara County is the most populous county in the Bay Area and will experience the greatest amount of growth. Santa Clara is expected to grow by nearly 23 percent over the next 25 years San Francisco will see the least amount of growth of the Bay Area's high population counties. San Francisco will grow by 15 percent by 2035, to 956,800 people.

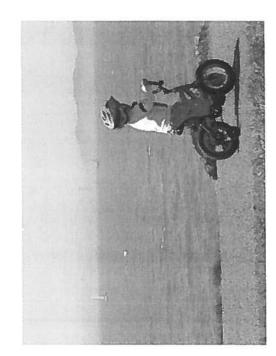
Though not as populous as San Francisco, Santa Clara or parts of the East Bay, Solano County is another fast growing county in the region. Today, Solano County is home to over 423,800 people. By 2035, Solano will see a 22 percent increase in its population, to 585,800 residents by 2035.

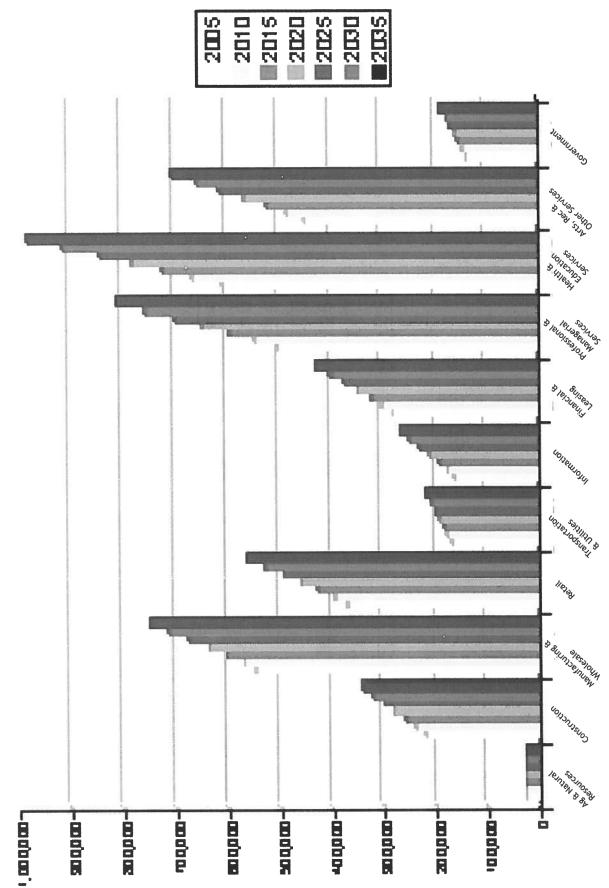
#### Jobs

While many of the Bay Area's new residents will be born here, others will come here for work. Almost 1.6 million new jobs will be added to the Bay Area's existing economy by 2035.

The Bay Area is famous for high-technology electronics, biotechnology and financial services. These industries are also among the Bay Area's fastest growing and are located primarily in San Francisco and Silicon Valley - San Mateo and Santa Clara Counties. These industries are part of the Information, Finance and Professional Services sectors, which account for nearly 46 percent of all Bay Area jobs.

Retail, Arts & Recreational Services, and Transportation and Utilities are the next largest job sectors. Together these jobs sectors comprise 34 percent of all jobs in the Bay Area - or 11, 12 and 11 percent, respectively. These jobs are found throughout the region, rather than being concentrated in few locations.





Job Growth by Industry Sector

Ý-

Agriculture and Natural Resources is another well known industry sector in the Bay Area, particularly in the wine growing region of Napa and Sonoma Counties. These industries are projected to see little growth, about 5 percent over the next 25 years. The wine country will see some job growth, but it is anticipated to be in Travel and Tourism.

### Housing Affordability

The Bay Area continues to be one of the priciest real estate markets in the country. Despite the recent mortgage crisis and soaring number of foreclosures, most Bay Area homes continue to be too expensive for families with average household incomes to afford. In 2007, only about 15 percent of Bay Area households could afford a median-priced home. This percentage was even lower in some Bay Area counties: 14 percent in Santa Clara, 13 percent in Napa and San Mateo and 10 percent in San Francisco.<sup>2</sup> All projections indicate that housing affordability, even with the short-term dip in prices, likely will remain a major regional issue.

Low levels of housing production, relative to demand, contribute to this region's high housing costs. The need for housing generated by the Bay Area's annual increase in population was 33,400 units per year during the 1980s. At that time, about 40,000 housing units were added to the supply each year, sufficient to meet new demand.

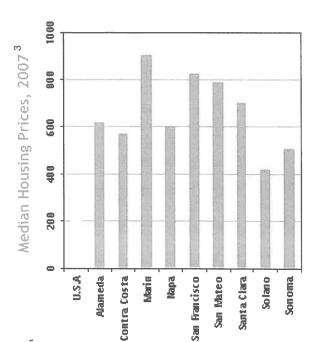
Since the 1990s, production has varied from year to year, but overall it has not kept up with population growth. Compared to the 1980s, annual population increases were slightly lower in the 1990s. Based on this growth, 29,500 housing units were needed in the region. However, housing production during the 1990s declined to about 27,000 units per year. Since 2000, the housing need from population increases is estimated to be 23,700 units per year. Actual housing production has been better, relative to the 1990s. Since 2000, an average of 23,336 housing units have been built per year. Marked the highest production at 24,396 units. I 7,459 units.

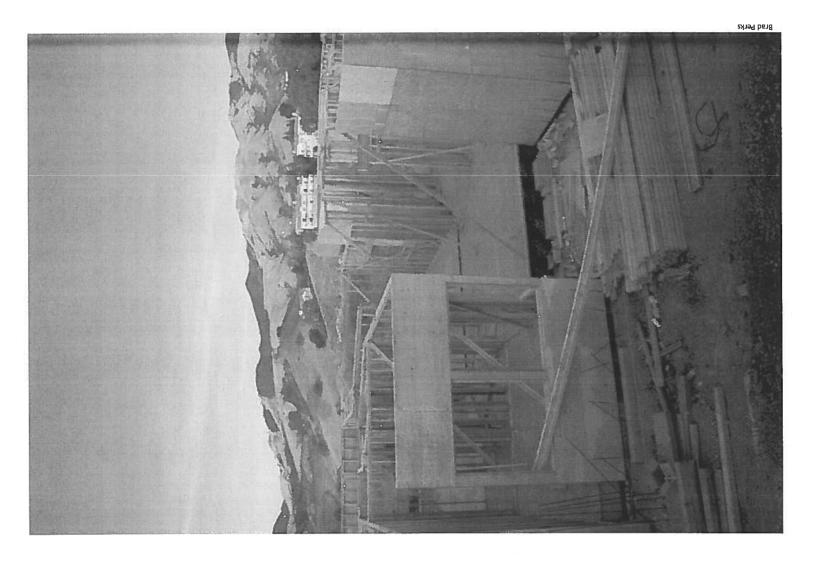
On top of the low historical production levels in the region, the mix of available housing types alco contributes to higher home prices. In many Bay Area communities, mostly large singlefamily homes are planned for and built. This offers consumers limited choice in housing types, especially relatively more affordable smaller homes, condominiums, townhomes, or apartments.

Multi-family housing can provide affordable options for individuals and families. Multifamily housing comes in a range of prices, but it can often include more affordable options than single-family homes.

The proportion of multi-family housing built in the Bay Area has increased in the last few years. Over 11,440 multi-family units were built in 2007 alone. About one third of the region's total housing stock is in multi-family structures.

Every city in the region has some multi-family units; however, 75 percent of all these units are located in just twenty-two cities - usually urban or long-established suburban cities. Forty-five percent of the region's multi-family housing is in San Francisco, San José or Oakland.<sup>4</sup>



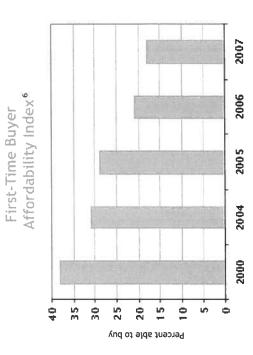


Not only will housing affordablity continue to be a Bay Area dilemma, but how and where we develop housing will continue to have both region- and state-wide impacts. Our current development pattern (mostly auto-dependent developments at the edges of the region, far from employment centers) contributes to the Bay Area's loss of open space and agricultural lands, traffic congestion and greenhouse gas emissions.

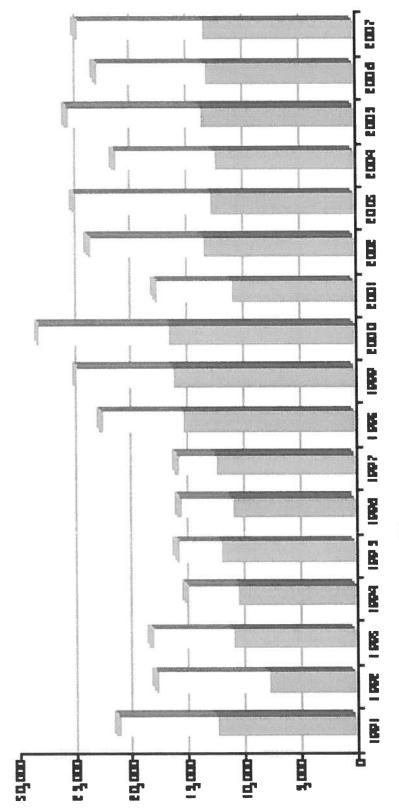
#### Transportation <sup>5</sup>

Bay Area residents take more than 21 million trips on an average weekday, or about three trips per person each day in order to get to work, school, shopping or other activities. More than 84 percent of all trips are by automobile. More than 57 billion miles were logged on the region's freeways, highways, expressways and local streets and roads.

The Bay Area is the most transit-rich region in California. Two dozen transit operators provide over 188 million vehicle miles of service and



Annual Bay Area Housing Production



initiagh family to the Abid Family to the

F ...

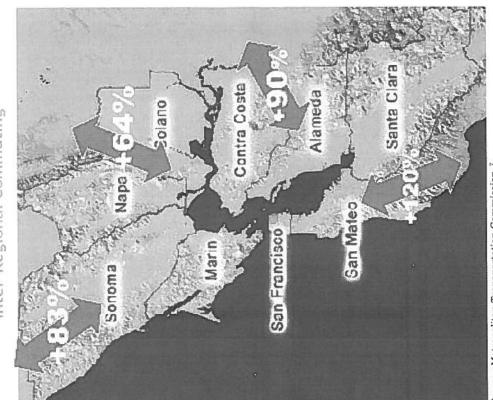
carry more than 475 million passengers each year. Buses provide just under half of all service miles and carry nearly two-thirds of all passengers. BART, commuter rail, light rail, ferries and door-to-door vans and taxis carry the remaining third. Despite this transit richness, the Bay Area's appetite for driving has yet to be curbed; only 6 percent of all trips are by public transit. Walking and biking account for only 10 percent of all trips. As a result, Bay Area congestion is anticipated to increase by 103 percent by 2030. Traveling to and from the Bay Area is projected to grow as well. Inter-regional commuting is anticipated to grow by double and even triple digits - mostly due to surrounding counties building homes for Bay Area workers. Commuting between the Bay Area and the Central Valley is expected to grow by 90 percent. The areas between San Mateo and Santa Cruz counties will see an increase of over 120 percent.

#### Air Quality, Land Use & Transportation

In the Bay Area, 50 percent of our carbon emissions come from the transportation sector alone. Of this 50 percent, 84 percent is from on-road vehicles, essentially cars. Motor vehicles are the single largest source of the gases that make ozone<sup>8</sup> and are also a significant source of particulate matter.

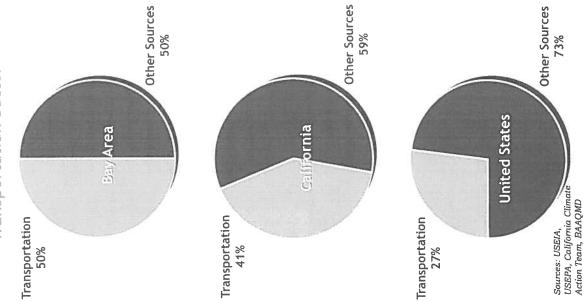
approximately 54 of every 1,000 childhood disease, occurring in auto emissions, asthma is now particulate matter and ozone.<sup>9</sup> not meet California air quality standards for several types of including asthma and cancer, especially in people who live to worsened air quality from The Bay Area currently does to significant health effects, **These pollutants are linked** heavy truck use. Partly due the most common chronic near major transportation corridors and areas with children in the U.S.<sup>10</sup> The disconnect between land use and transportation is partly to blame. Decades of planning and building auto-oriented communities, separated from existing job centers, have resulted in a region that is highly auto-dependent. As development has been pushed to the edges of the region, and into neighboring the regions, the average number of hours per day people spend in traffic has grown from 68,500

Projected Increase Inter-Regional Commuting



Source: Metropolitan Transportation Commission

#### Greenhouse Gas Emissions from Transportation Sector



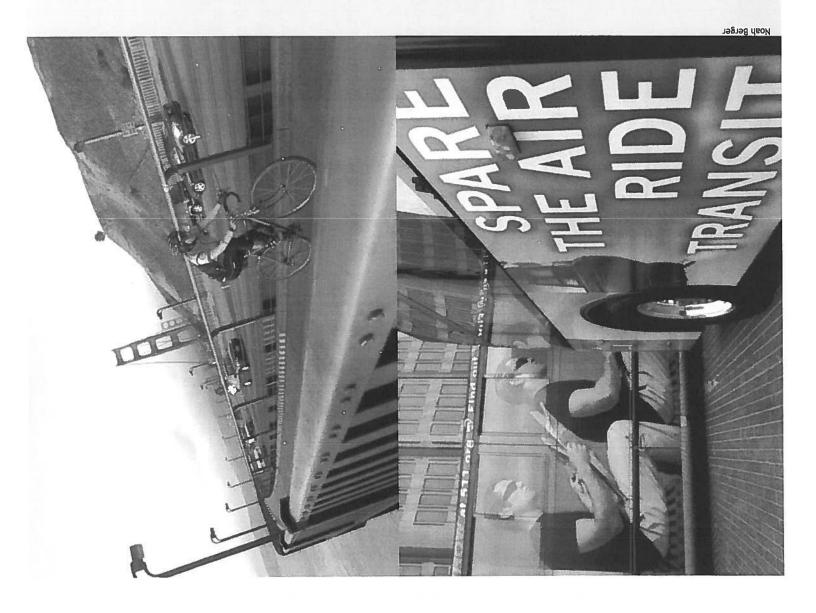
in 1995 to 124,190 in 2004 - an increase of 181 percent.<sup>11</sup> In addition, nearly 20 percent of Bay Area workers have a commute of 45 minutes or more.<sup>12</sup>

There is, however, growing support for more traditional styles of development - communities where walking, biking and transit are viable options. With good design, sensitive to existing neighborhoods, infill development can build upon the unique features of each community. By offering more housing and transportation choices, infill may also contribute to the overall sustainability of the region. One study indicates that a more dense, walkable development can reduce driving by as much as 40 percent, as compared to an autooriented development.<sup>13</sup> Focusing housing growth in the areas closest to the San Francisco Bay is also more energy efficient. The climate around the Bay is more moderate than in the eastern-most reaches of the region and in the Central Valley. Homes built near the Bay use less energy for cooling and heating. This is significant because energy production is a major source of the greenhouse gases that contribute to climate change.

#### **Our Challenge**

This air quality/land use/transportation connection is our fundamental regional planning challenge. An estimated 700,000 new homes will be needed by 2035 to accommodate the Bay Area's projected population. It is imperative that we plan for this housing in a way that also meets our regionwide housing affordability, transportation and environmental objectives, including global climate change. The Bay Area's RHNA method, as described in the  $\swarrow$  next few chapters, attempts to respond to this challenge. It calls for better region-wide land use and transportation planning, so that we may reduce driving, and hopefully reduce our greenhouse gas emissions. State Housing Element Law supports, and actually requires, this approach. The law dictates that each region in the state allocate its housing need in a way that promotes more infill development and efficient development patterns.

In reading the remainder of this report, you will see that the Bay Area's Regional Housing Needs Allocation clearly meets this mandate.



Since 2002, the region's forecast has been "policy-based." This means we assume local governments will adopt land use policies and plans that support regional policy objectives... including increased housing development that supports alternative transportation modes.

These objectives would be accomplished by local governments allowing more housing production within the region, near transit and in existing urban areas.

Additional growth in these places would enable more people to bike, walk or take transit.

# Projecting Land Use for Transportation Alternatives

Every two years, Bay Area regional planners forecast the region's population, households, and employment. This forecast is called *Projections 2007*, data are reported for year 2000, and then for each five year increment, to 2035.

Data from *Projections.2007*, specifically household and employment growth and existing jobs, serve as the basis for the Bay Area's housing needs allocation method, hence a short *Projections* primer is in order.

Several related forecasting computer models are used to perform the forecast. The economic model balances the demand for the production of goods and services with the supply of productive capacity. The demographic model uses birth rates, death rates and migration data to forecast future population via a cohort survival model.

A great deal of data is required by the models, including information on economic relationships and trends, population-related information like births, deaths and migration, as well as existing land use and local land use plans and policies. We continuously collect information on local land use as part of the modeling effort. The forecast is produced for over 1,400 census tracts in the region and shows existing land use and the capacity of

each tract to support additional population or economic activity.

Because the forecast is based on local land use information, forecasted growth occurs in locations that are consistent with local plans. However, with 1400 census tracts, only so many details can be included. For example, we may know that moderate growth can occur in an area without specifically identifying exactly where that growth may take place. Growth may or may not occur in a very specific location due to physical or environmental limitations, such as steep slopes, or there may be a local land use policy that prohibits growth within certain geographic areas.  Since 2002, the regional population, household and job forecast has been a "policy-based"

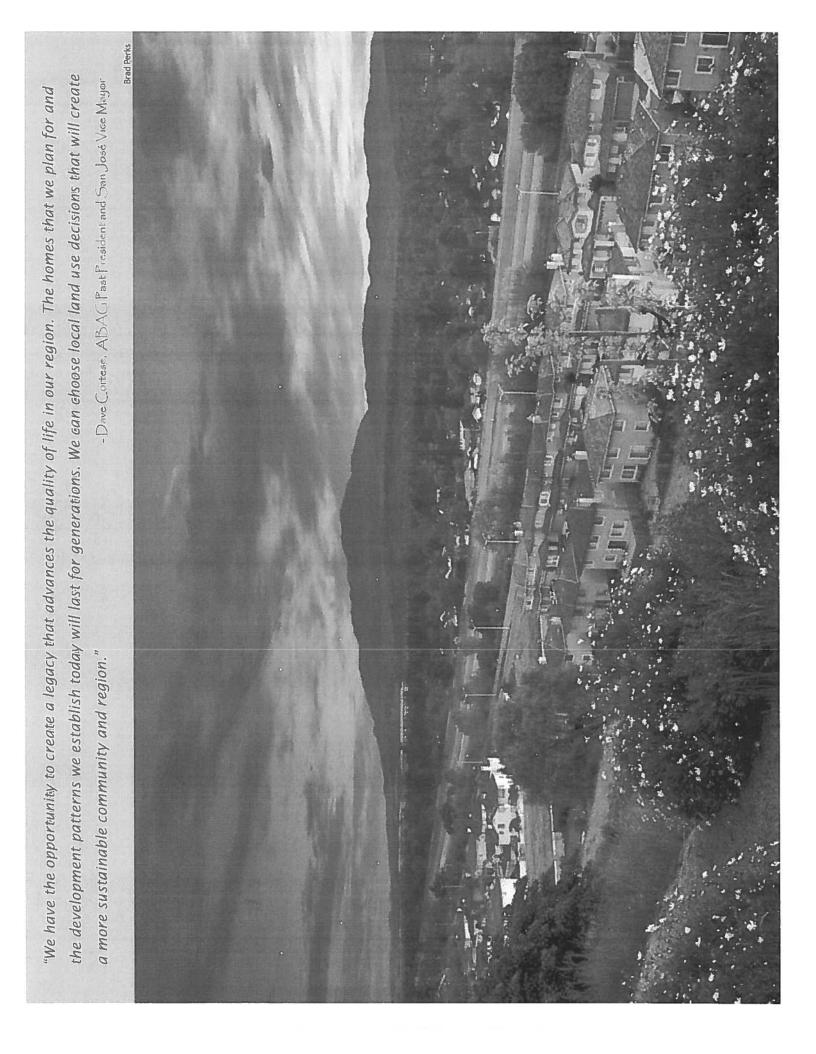
Job Torecast has been a policy-based forecast. This means we assume that local governments will adopt land use policies and plans that support regional policy objectives. These policy objectives are listed on page 17. They include land use policies that increase housing development and alternative transportation modes. These policy objectives would be accomplished through higher levels of

housing production within the region, as opposed to communities just outside of the Bay Area. There would also be an increased proportion of growth occurring near transit and in existing urban areas. More growth in our existing communities, near jobs and transit, would enable more people to take advantage of alternative travel modes, including biking, walking and transit.

In Projections 2007, additional housing production and a shift in the pattern of development occurs in the later part of the forecast, i.e., beyond 2010. Earlier in the forecast, population growth is generally consistent with local general plans and the California Department of Finance forecast for growth.



• ......



# State Housing Element Law

State law requires each city and county to adopt a general plan.<sup>14</sup> The general plan must contain seven elements, including housing. Unlike other mandatory general plan elements, the housing element, which is required to be updated every five years, is subject to detailed statutory requirements, housing element law and a mandatory review by the State Department of Housing and Community Development. Housing elements have been mandatory portions of general plans since 1969. This reflects the statutory recognition that the availability of housing is a matter of statewide importance. The limitation of the state's housing supply through planning and zoning powers affects the state's ability to achieve its housing goal of "decent housing and a suitable living environment for every California family." A limited housing supply also impacts the state's ability to remain economically competitive.

Housing element law requires local governments to plan for their existing and projected housing need. It is the state's primary "market-based strategy" to increase housing supply. The law recognizes that in order for the private sector to adequately address housing needs and demand, local governments must adopt land-use plans and regulations, i.e., zoning, that provide opportunities

for housing development, rather than constrain opportunities.

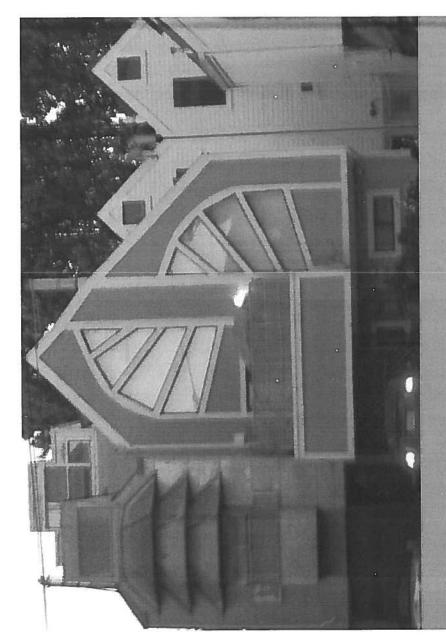
The State is required to allocate the region's share of the statewide housing need to Councils of Governments (COG) based on Department of Finance population projections and regional population forecasts used in preparing regional transportation plans. Here in the San Francisco Bay Area, the Association of Bay Area Governments (ABAG) serves as the region's COG. Housing element law requires the COG, or ABAG, to develop a Regional Housing Need Plan (RHNP). The plan describes the region's allocation method and the actual allocation of housing need to the cities and counties within the region. This document serves as the Bay Area's Regional Housing Need Plan.

According to state law, the regional housing needs plan is to promote the following objectives:

 Increase the housing supply and the mix of housing types, tenure, and affordability in all cities and counties within the region in an equitable manner;

 2. Facilitate infill development and socioeconomic equity, the protection of environmental and agricultural resources, and the encouragement of efficient development patterns; and
 3. Improve intra-regional relationship between jobs and housing.





The State Housing Department is required to allocate the region's share of the statewide housing need to Councils of Governments (COG).

The housing need is based on Department of Finance population projections and regional population forecasts used in preparing regional transportation plans.

In the San Francisco Bay Area, the Association of Bay Ar Governments is the region's COG.

Housing element law also requires the Department of Housing and Community Development to review local housing elements for compliance with State law and to report its written findings to the local government.

## Housing Law Amendment

Periodically, state housing law is amended. One amendment, AB 2634 (Lieber, 2006), requires cities to plan for extremely low-income populations. While it doesn't require HCD or the COGs to include extremely-low in the allocation of Regional Need, the legislation mandates that local governments calculate the subset of the very-low income regional need that constitutes the communities need for extremely-low income housing. Local governments can either identify their own methodology for calculating the need or presume that the need is 50 percent of the total very-low income need.

Another amendment, Senate Bill 2 (Cedillo, 2006), requires local jurisdictions to strengthen provisions for addressing the housing needs of the homeless. This includes the identification of a zone, or zones, where emergency shelters are allowed as a permitted use without a conditional use permit.

For more amendments, see www.hcd.ca.gov/hpd/ housing\_element/index.html.

# Bay Area RHNA Schedule

ABAG an approval for a two-year extension for completing the Regional Housing Needs Allocation process On September 29, 2006, the State Department of Housing and Community Development (HCD) granted and plan. The following RHNA milestones reflect that two-year extension:

## November 16, 2006

ABAG Executive Board adopts Draft Allocation Methodology Start 60-day public comment period

## January 18, 2007

ABAG Executive Board adopts Final Methodology

## March 1, 2007

HCD determines San Francisco Bay Area Regional Housing Need

#### July 31, 2007

ABAG releases Draft Regional Housing Needs Allocation Plan

#### June 30, 2008

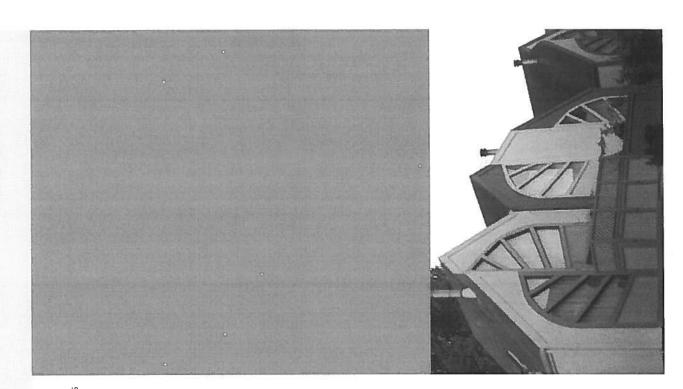
ABAG releases Proposed Final Regional Allocation Plan

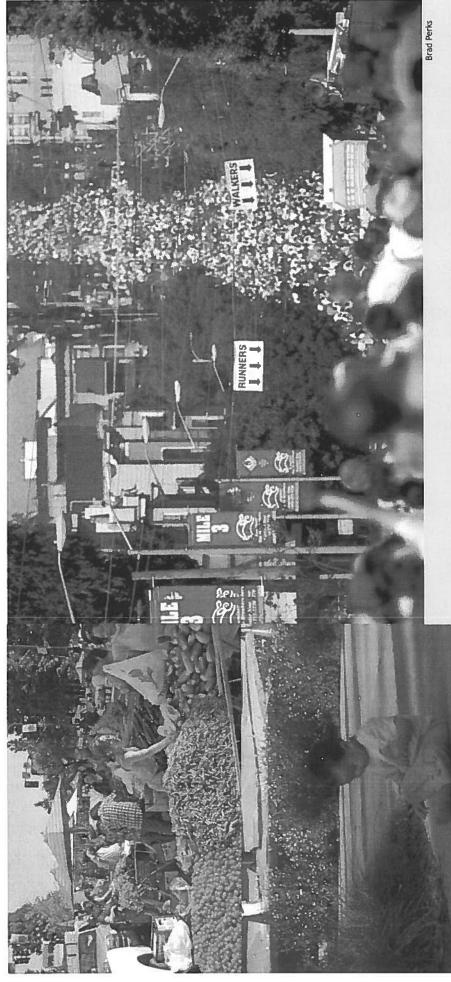
### August 29, 2008

HCD reviews Proposed Final Regional Housing Allocation Plan

#### June 30, 2009

Local Governments complete Housing Element Revisions







The regional housing need is determined by estimating the existing formation rates - how many new households are formed each year, growth is dependent on total net births, migration and household estimates of existing and projected household growth. Household e.g., young adults move out of their parent's home into homes of and projected need for housing. Both are determined through their own.

Based on estimated household growth, the total regional housing need is 214,500 units, through the year 2014.

# Determining the Regional Housing Need

The regional housing need is determined by estimating both the existing need and the projected need for housing. Existing need is the amount of housing needed to address existing overcrowding or low vacancy rates. Projected need relates to providing housing for the growing population. Using slightly different methods, both the State, through the State Department of Finance (DOF), and the region, via ABAG, estimate projected household growth. Since these numbers may differ, the State and the region work closely together to arrive at an agreed upon estimate of future population growth; therefore, housing need through 2014.

#### **Existing Need**

Existing need is based on state estimates of total households in 2005, plus growth during 2006. A vacancy rate of 5 percent for renters and 1.8 percent for owners is applied to arrive at a vacancy goal (95,395). The total existing housing need of 1,984 units is derived from subtracting existing vacancies (93,411) from the vacancy goal. Both ABAG and DOF use this total to determine "existing housing need."

#### **Projected Need**

Projected need is determined by the components of population growth: 1) births minus deaths, or natural increase; 2) migration; and 3) household formation rates. ABAG and DOF assumptions

regarding births, deaths and migration are fairly consistent. However, each agency uses different assumptions regarding household formation or headship rates. Under DOF assumptions, household growth for the region is higher than what is projected by ABAG.

To estimate the number of households, ABAG uses a ratio of housing units to total population. The state uses detailed headship rates to make their determination of household population. State legislation requires that headship rates be used to determine regional housing needs.

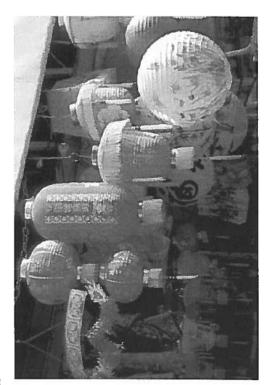
Based upon data supplied by DOF, headship rates have declined significantly, by age group, between the 1990 and the 2000 Census. DOF's calculation of headship rates from its 2004 forecast show continued, although more moderate declines. ABAG staff anticipates continued moderate declines in the headship rates to the end of the RHNA period in 2014.

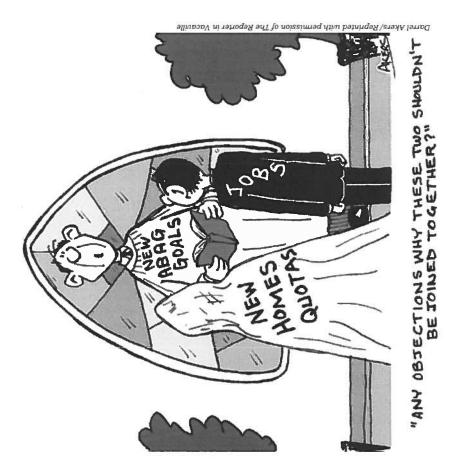
Both state and regional agency staff agreed that Bay Area headship rates used to determine the region's housing need should correspond closely to anticipated headship rates during the RHNA period. Therefore,

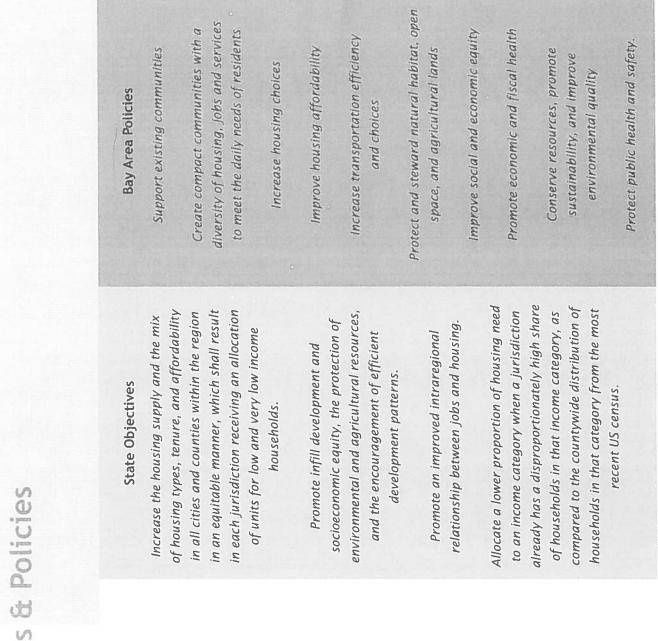
state and regional agency staff agreed that a 2004 headship rate would be used to determine the region's housing need during the 2007-2014 period.

#### **Total Need**

Applying the 2004 headship rates to regional population forecasts provided by the State means that the projected regional need for the Bay Area would be about 212,500 housing units. Once you add in existing need, the total housing need for the region is 214,500 housing units.<sup>15</sup>







Consistent Objectives & Policies

There are three primary statutory objectives of the regional housing needs allocation process: to increase housing supply, affordability, and housing types; to encourage efficient development and infill; and to promote jobs-housing balance. These objectives are consistent with the Bay Area's regional growth policies.

In 2002, Bay Area regional agencies, local governments, community groups, and residents considered a challenging question, "How can the Bay Area accommodate future growth in a way that increases housing availability and affordability, reduces traffic congestion, protects the environment and improves air quality?"

The answer they found was a set of regional policies for growth in the San Francisco Bay Area. Four regional agencies - the Association of Bay Area Governments, the Bay Area Air Quality Management District, the Metropolitan Transportation Commission and the Bay Conservation and Development Commission - adopted growth policies, as listed at right.

The region's land use projections and programs that provide financial incentives would be used to realize these policies. 0

Since adopting these growth policies, in drafting  $\not{}$  *Projections*, regional agency staff assumes that local governments will adopt supporting land use plans and policies. The expectation is that local plans and policies will advance these policies by promoting the development of walkable communities, where more housing development may take place near existing jobs and transit, and at infill locations. Adoption of such policies would effectively implement the region's land use policy objectives.

The land use assumptions contained within *Projections* are also consistent with the State's RHNA objectives. As with the State's objectives, regional policies embedded in *Projections* call for an increase in the supply of housing, jobs-housing balance, protection of the environment, and a more efficient development pattern, i.e., infill development within existing communities and near jobs and transit. Since the region's policy-based *Projections* serve as the basis for the RHNA allocation formula, the Bay Area's housing needs allocation is also consistent with the State's RHNA statutory objectives.



# Housing Need Allocation Method

The region's total housing need is allocated to Bay Area jurisdictions through an allocation method. The method contains two distinct components, mathematical equations and rules.

There are two mathematical equations in the allocation method. The first equation is used to allocate total units among jurisdictions. This equation consists of factors, each weighted to indicate relative importance. The second equation is used to divide each jurisdiction's total need, based on the first formula, into the four income categories, as defined by state law.<sup>16</sup>

The allocation method also contains a set of rules. These rules address how to allocate units by income, how to handle units in spheres of influence and voluntary transfers of units between jurisdictions and subregions.<sup>17</sup> This chapter covers the first mathematical equation, the primary one used to allocate units to jurisdictions. The next several chapters cover the income allocation formula and the allocation rules.

## Math Equation Factors

RHNA law delineates the specific factors that must be considered for inclusion in the mathematical equation component of the housing needs allocation method.

#### These factors are:

- 1 . Water and sewer capacity
- 2. Land suitable for urban development or
- conversion to residential use
- 3. Protected open space lands protected by state
  - and federal government
- 4. County policies to protect prime agricultural land
- 5. Distribution of household growth
- 6. Market demand for housing
- 7. City-centered growth policies
- 8. Loss of affordable units contained in assisted
  - housing
- 9. High housing cost burdens
- 10. Housing needs of farm workers
- 11. Impact of universities and colleges on housing needs in a community.

In devising the formula for allocating units to jurisdictions, staff and members of the Housing Methodology Committee (HMC) had to consider how each of these statutory factors could be incorporated into the mathematical equation component of the allocation method. Staff and HMC members, as required by law, sought input on the factors and how they could be

used from every jurisdiction in the Bay Area. On September 15, 2006, ABAG staff surveyed all Bay Area planning directors. Forty-two local jurisdictions responded to the survey. They offered input on individual factors and had ideas for additional factors that could be considered. (A detailed summary of survey responses is available at http://www.abag.ca.gov/planning/ housingneeds.) A second survey was conducted in December 2006. This survey was in response to a new state law (passed in Spring of 2006) requiring that the impacts of either California State Universities or University of California campuses be considered in the housing need allocation method. As a new factor, ABAG staff was required to survey local governments about their student populations.



As the region's Council of Governments, ABAG is responsible for allocating the state-determined regional housing need to all jurisdictions in the Bay Area. To assist in this effort, a Housing Methodology Committee was established in May of 2006. Their charge was to assist staff in developing a recommended method for distributing the regional housing needs to each Bay Area jurisdiction. The committee was made up of ABAG board members, local elected officials, city and county staff, and stakeholder versentees trepresentatives from each county in the region.	Committee members demonstrated tremendous dedication in the work they undertook. Their great effort resulted in recommendations that were consistent with state and regional policy objectives.		Mark Duino, Planner, San Máreo County Laurel Prevetti. Deputy Director Planning, Building and Code Enforcement, City of San Jose Regina Brisco, Housing Planner, City of Giltoy Regina Brisco, Housing Director. City of Cupertino Matt Walsh, Principal Planner, Solano County Oruck Dimmick, Vacaville Councilmember, Solano City/County Coordinator Eve Somjen, Assistant Director, City of Fairfield Mike Moore, Community Development Director, City of Petaluma Jake Moore, Community Development Director, City of Rahuma Jake Moore, Council Member, City of Rohnert Park Jennifer Barrett, Deputy Director Planning, County of Sonoma Geeta Rao, Policy Director, Nonprofit Housing of Northern California Kate O'Hara, Regional Issues Organizer, Greenbelt Alliance Margaret Gordon, Community Liaison, West Oakland Indicators Project Andrew Michael, Vice President, Government Affairs & General Counsel, Home Builders Association
As the region's Council of Governments, ABAG is responsible for allocating the state-determined regional housing need to all jurisdictions in the Bay Area. To assist in this effort, a Housing Meth Committee was established in May of 2006. Their charge was to assist staff in developing a recolmethod for distributing the regional housing needs to each Bay Area jurisdiction. The committee was made up of ABAG Board members, local elected officials, city and county staff, and stakehol representatives from each county in the region.	Committee members demonstrated tremendous de resulted in recommendations that were consistent	Thank you.	Barbara Kondylls, Solano County Supervisor, District I, ABAG Executive Board Scott Haggerty, Alameda County Supervisor, District I, ABAG Executive Board Jeffrey Levin, Housing Department, City of Oakland Jennifer Hosterman, Mayor, City of Pleasanton Dan Marks, Director of Planning & Development, City of Berkeley Julie Plerce, Council Member, City of Clayton Phillip Woods, Principal Planner, City of Concord Gen Regalia, Council Member, City of Kahut Creek, ABAG Executive Board Linda Jackson, Principal Planner, City of San Rafael Dan Jackson, Principal Planner, City of San Rafael Paul Jackson, Principal Planner, City of Sausalito Stacy Lauman, Assistant Planner, City of Sausalito Paul Barser, Senior Planner, City of Sausalito Dan Hasser, Senior Planner, City of San Rafael Dinn, Supervisor, County of Marin Jean Hasser, Senior Planner, City of San Rafael Dinn, Supervisor, County of Napa Diane Dillon, Supervisor, County of Napa Diane Dillon, Supervisor, County of Napa Diane Dillon, Supervisor, County of San Franciso Doug Shoemaker, Mayor's Office of Housing, City of San Franciso Doug Shoemaker, Mayor's Office of Housing, City of San Franciso Dung Shoemaker, Mayor's Office of Housing, City of San Franciso Dung Shoemaker, Mayor's Office of Housing, City of San Franciso Dung Shoemaker, Mayor's Office of Housing, City of San Franciso Dung Shoemaker, Johnner, Town of Colma

Staff and most housing methodology committee members agreed that by using household population statistics in the methodology, the appropriate student populations were considered. Household population estimates are inclusive of the entire household population and would therefore account for all people living in homes - including students.

Only the "group quarters" population - those living in college dormitories - are not included in household population counts. Group quarters population is taken into account in the "total population" estimates. Therefore, the allocation methodology does not propose a specific factor to represent the impact of student populations. The final allocation method adopted by ABAG's Executive Board includes factors related to housing, employment and public transit.<sup>18</sup> Each factor is given priority relative to the others through "weighting" in the formula. For example, if one of the factors, e.g., household growth, is determined to be more important than another factor, e.g., transit, the methodology would give household growth a higher weight than transit. If two or more factors are determined to be of equal priority, they would be equally weighted. State law also allows for "zero weighting" of a required factor,

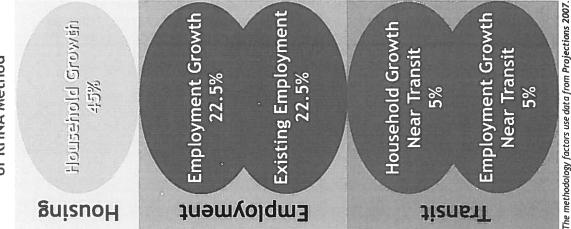
if an appropriate rationale for the zero weight can be offered by the Council of Governments. For the Bay Area's allocation formula, the selected factors and their respective weights are:

- Household growth (45%)
  Existing employment (22.5%)
  - Employment growth (22.5%)
- Household growth near existing transit (5%)
- Employment growth near existing transit (5%)

Household growth, existing employment and employment growth are each forecasted in the region's job, household and employment forecast, *Projections 2007*. By applying these factors and weights in the allocation formula, housing would be allocated to jurisdictions in a manner consistent with state RHNA objectives, statutory requirements, local land use and regional policies. Jurisdictions would then be required to plan for their allocated number of housing units within the housing elements of their general plans.

Specifically, the selected factors result in: • Housing units directed to areas where local governments are planning housing growth;
Housing and job growth being planned together and existing jobs-housing imbalances being addressed;

#### Weighted Factors of RHNA Method



Housing development directed to communities with transit infrastructure; and

Fewer housing units directed to outlying areas; thereby reducing development pressures on open space and agricultural lands.

## Household Growth, 45 Percent

Use of this weighted factor directs each local jurisdiction to plan for housing according to its share of regionally projected household growth.

The use of household growth as a factor represents consistency with local, regional, and state policies. Household growth is used as a factor, as opposed to existing units or total units, to ensure that additional housing is not planned where there are existing concentrations of homes in the region, but rather where growth is being planned. Those areas that are planning for household growth, according to local and regional land use policies, would receive a higher allocation than those areas not planning for growth.

ABAC's projections of household growth is based on local land use policies and plans; demographic and economic trends (such as migration, birth and death rates, housing prices, and travel costs) and regional growth policies. The location of estimated household growth within the region is most influenced by local land use

plans and policies, including planned and protected agricultural lands, open space and parks, citycentered growth policies, urban growth boundaries, and any physical or geological constraints.

Regional policies incorporated into *Projections* are assumed to begin influencing growth by 2010, and therefore have some effect on regional housing growth estimates in the 2007-2014 RHNA period. These policies assume that there will be increased housing growth in existing urbanized areas, near transit stations and along major public transportation corridors. More growth in existing urbanized communities translates into less development pressure on the region's environmental and agricultural resources. Growth in urban areas may facilitate development efficiencies and more infill development at higher densities. Such development may support increased transportation choices, e.g., walking and public transit, especially if development is planned near transit, services and existing jobs.

These land use assumptions and their potential beneficial impacts are consistent with state housing policies to promote infill development, environmental and agricultural protection and efficient development patterns.

The household estimates in *Projections* account for all people who live in housing units, including students. Thus, students that occupy part of a local jurisdiction's housing stock are counted as such. Students are also counted as a source of future household formations. The portion of the student population that occupies "group quarters," such as college dormitories, are not included in household population counts. This is consistent with state policy regarding RHNA that excludes "group quarters" from being counted as housing units.

#### Employment, 45 Percent (Existing 22.5%, Growth 22.5%)

Use of these weighted factors directs each local jurisdiction to plan for housing to accommodate existing employment (2007) and regionally projected employment growth (2007-2014).

Using employment (existing and growth) in the RHNA allocation method creates consistency with local policies, plans and local capacity for job growth. The inclusion of employment growth as a RHNA factor ensures that the regional housing need is allocated to places where job growth is anticipated to occur during the 2007-2014 RHNA period. Cities or counties with planned job growth would be responsible for planning housing for the additional jobs that are added to their communities.

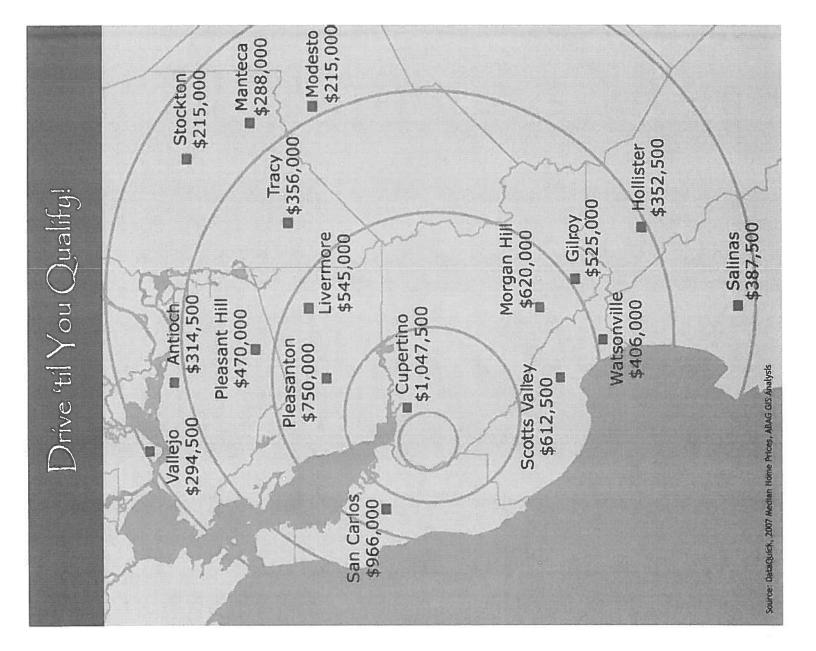


All photos by Simon Dale

An innovative, sustainable approach to housing development, this home was built by Simon Dale and his family in Wales. They dug into the hillside for low visual impact and shelter. Stone and mud from the diggings were used for retaining walls and foundations. The frame is made of oak thinnings (spare wood) from surrounding woodland. Skylights let in natural light and solar panels are used for lighting, music and computer use. Water is collected by gravity from nearby spring. There is a compost toilet and roof water collects in a pond for the garden.

See www.simondale.net/house/index.htm



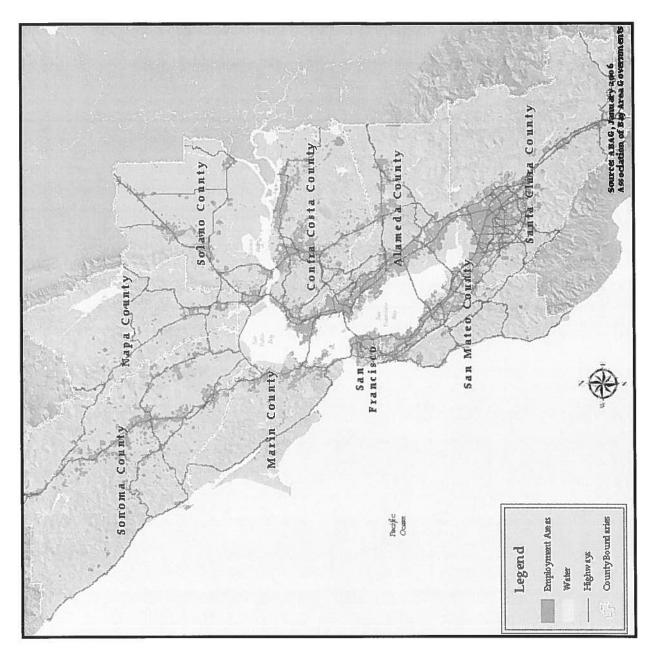


Use of employment as a factor also ensures that jurisdictions with both existing jobs and planned job growth plan for housing needed by people anticipated to work at those jobs. Housing near jobs would also reduce vehicle miles traveled. People could travel less distance to their jobs or take alternative travel modes, since most existing job centers are also transit rich. More housing in existing job centers may also encourage infill and efficient development patterns through higher densities in existing jobs also places less development pressure on outlying areas, especially in rural areas with agricultural lands and protected open space. In the Bay Area, as in many metropolitan areas, cities with employment centers have historically planned for insufficient housing to match job growth. This lack of housing has escalated Bay Area housing costs Unmet housing demand has also pushed housing production to the edges of our region and to outlying areas. San Joaquin, Stanislaus, and San Benito counties have produced much of the housing needed for Bay Area workers. People moving to these outlying areas has led freeways, inefficient use of public transportation infrastructure and land. Negative impacts on health, equity, air quality, the environment and overall quality of life in the Bay Area also result.

The HMC considered the degree to which employment would be considered in the RHNA method. They considered three options: employment growth, existing jobs and total jobs (existing jobs and job growth) for the 2007-2014 RHNA period.

is a moderately aggressive approach, relative to the jurisdictions that are both currently job centers and those with anticipated job growth. Therefore, this imbalances. However, existing jobs does not take employment growth also plan for commensurate housing imbalances, and therefore it is the least factor would give relatively higher allocations to aggressive option. Existing jobs as an allocation factor would give relatively higher allocations to existing job centers and would therefore be the ineffective in addressing historic regional jobsinto account future job growth. Total jobs as a most aggressive toward historic jobs-housing assure that jurisdictions that are planning for Using employment growth as a factor could housing. However, this alone would be other two.

The final allocation method uses a combination of the least and most aggressive options. The method separately weights employment growth and existing employment, addressing historic jobshousing imbalances, while also attempting to avert future imbalances. Although it is an aggressive



27

approach, it is more balanced than the use of total jobs as a factor. A total jobs factor would primarily direct growth to existing job centers, especially if it received the entire 45 percent weight for employment, as opposed to the 22.5 percent weight.

## Existing Employment, 22.5 Percent

The location and amount of existing jobs in the region is determined through existing regional and local job data and regional and local economic trends. Trends include attractiveness of commercial/industrial locations. Labor force costs, housing prices, travel costs, access to potential employees, markets and presence of similar businesses - to take advantage of agglomeration economies - all make an area attractive for jobs. The inclusion of existing employment as a factor in the allocation method ensures that regional housing need is allocated in a manner consistent with regional policies and state objectives, namely jobs-housing balance, infill development and increase in travel efficiencies and choices.

#### Employment Growth, 22.5 Percent The forecast of the location and amount of employment growth in the Bay Area is based on local land use plans and policies, economic

trends and regional policies. The estimate of

employment growth also considers all local land protection policies and physical constraints. The employment-related factors identified by both state law and the HMC for inclusion in the allocation method are also incorporated into the region's estimate of employment growth. These factors include: existing Jobs centers, home-based businesses, employed residents, housing prices, household income and employment at private universities and campuses of the California.

In addition, regional policies in ABAC's *Projections* ensures that employment growth as a RHNA factor creates consistency with both state and regional polices regarding growth, infill development and efficient use of land. Regional policies in *Projections* assume that relatively more job growth will occur in existing urbanized communities and near transit, while less growth is projected in outlying communities with an transit infrastructure, including those with agricultural areas and open space.



promote greater use of public transportation through increased job development near transit.

### Household Growth, Transit: 5 Percent Employment Growth, Transit: 5 Percent

Use of household and job growth near transit as weighted factors directs each local jurisdiction to plan for housing if they have an existing transit station and are planning for household or job growth near that station. As a factor, "household growth near transit" allocates five percent of the regional housing need to jurisdictions based on their forecasted household growth near existing transit stations. The factor "employment growth near transit" allocates five percent of the region's housing need to jurisdictions based on their forecasted employment growth near existing transit stations. For the purposes of the allocation method, transit is defined as areas with existing fixed alignment public transit. Transit services included are: Altamont Commuter Express (ACE), Bay Area Rapid Transit (BART), Caltrain, San Francisco MUNI light rail, the Capital Corridor, Santa Clara Valley Transportation Authority (VTA) light rail and ferries.

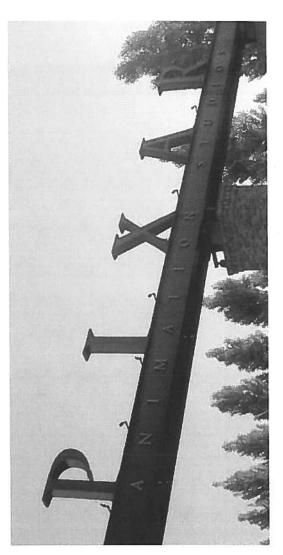
stations.

Growth near transit is defined as household or employment growth within one-half mile of an

existing transit station, but eliminating any overlap between stations located within one mile of each other. Placing a transit factor directly into the methodology gives extra weight to this state and regional objective This is because a transitbased policy is already incorporated into ABAG's policy-based *Projections*. Current regional policy places incrementally more growth along major transportation corridors and at transit stations. Therefore, a housing need allocation that uses regional housing growth and employment as factors would indirectly include "transit" as a policy issue in the allocation formula. Using transit as a factor in the methodology would give transit a greater degree of policy weight. The effect is that jurisdictions with existing transit stations would receive a relatively higher proportion of the housing needs allocation than jurisdictions without transit

Transit is used as a direct factor, in part, due to the expectation that impacts of the

policy assumptions in *Projections* will not begin to take effect until 2010. Directing growth to areas with public transit in the allocation methodology ensures that this regional policy truly influences development patterns during the RHNA period. A transit factor in the formula also addresses the state objectives and regional goals of encouraging the use of transit and the efficient use of transportation infrastructure. Housing near transit also promotes infill development, since transit stations are primarily in urbanized areas within the region.



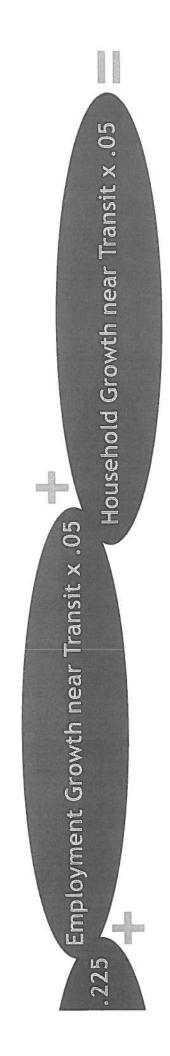


## The Allocation Formula

Household growth, employment growth, employment and transit factors\* are weighted together to create an allocation formula. Each factor describes a jurisdiction's "share" of a regional total. For example, if the region expects to grow by 100 households, and a city in the region is to grow by 10 households over the same period, then that city's "share" of the region's growth is 10 percent.

A jurisdiction's share of the regional housing need is assigned according to its percentage share of regional household growth, employment growth near transit.

#### Jurisdi Housing Nee



## ction's d Allocation

\* Growth is for the time period covering the RHNA planning period, 2007 - 2014. The transit factors refer to growth that occurs within a ½ mile of existing fixed transit stations in the jurisdiction.



The income allocation method gives jurisdictions that have a relatively higher proportion of households in a certain income category a smaller allocation of housing units in that same category. Conversely, jurisdictions that have a lower proportion of households in an income category would receive a larger allocation of housing units in that same category.

Under this formula, the income distribution within each jurisdiction moves closer into alignment with the region-wide distribution of household income. By taking a

jurisdiction's existing income distribution into account, we may avoid exacerbating existing concentrations of poverty within the region.

The multiplier acts as the key determinant in the distribution of affordable housing, and therefore household income around the region. The higher the multiplier, the more aggressive the redistribution. The Bay Area

# Income Allocation Method

Two primary objectives of the state's regional housing needs process are to increase the supply of housing and to ensure that local governments consider the housing needs of persons at all income levels. The income allocation portion of the Regional Housing Needs Allocation method is designed to ensure that each jurisdiction in the Bay Area plans for housing for people of every income. The method is based on the region-wide distribution of household income. It also considers existing concentrations of poverty within the region.

The percent of households within the Bay Area that fall within each of the state-defined income categories are:

Very-Low, 23 Percent Up to 50 percent of Median Income 16 Percent, Low Between 50 and 80 percent of Median Income 19 Percent, Moderate Between 80 and 120 percent of Median Income

42 Percent, Above-Moderate Above 120 percent of Median Income

Once a jurisdiction's total need is calculated, using the formula listed in the last chapter, those total units are then divided using an income allocation method, based on region-wide income distributions. To address concentrations of poverty, each jurisdiction is given 175 percent of the difference between their 2000 household income distribution and the 2000 region-wide household income distribution.

## **Income Allocation Formula**

The first step in calculating the income distribution of a jurisdiction's housing need allocation is to determine the difference between the regional proportion of households in an income category and the jurisdiction's proportion for that same category. Once determined, this difference is then multiplied by 175 percent. The result becomes that jurisdiction's "adjustment factor." The jurisdiction's adjustment factor is added to the jurisdiction's initial proportion of households in each income category. The result is the total share

of the jurisdiction's housing unit allocation for each income category.

Using Oakland as an example: the city's percent of household in the very low income category is 36 percent. The regional percentage in this category is 23 percent of households. The difference between 23 and 36 is -13. This is multiplied by 175 percent (the adjustment factor) for a result of -22.75. This number is then added to Oakland's original distribution of 36 percent, for a total share of about 13 percent.

A similar calculation for Piedmont, which has a relatively low proportion of households in the "verylow" income category, results in their adjustment factor amounting to 24. That amount is added to their proportion of households in the "very-low" income category. When added together, Piedmont's total percent of housing units in that category then becomes 33 percent. Therefore, 33 percent of their allocation must be affordable to families with verylow income.

	Jurisdiction	Regional			Adjustment	Total
City	Proportion	Proportion	Difference	Multiplier	Factor	Share
Oakland	36	23	-13	175%	-23	13
Piedmont	6	23	14	175%	24	33

There was an Old Woman Who Lived in a Shoe... in Oakland, Lake Merritt, Children's Fairyland. The Sphere of Influence rule for the Bay Area's RHNA method states that each city with land-use permitting authority over its SOI should plan for all the housing needed to accommodate future housing growth, existing employment and employment growth within its sphere of influence.



## Spheres of Influence

Every city in the Bay Area has a "sphere of influence" or SOI. The SOI boundary is designated by the county's Local Area Formation Commission (LAFCO). The LAFCO influences how government responsibilities are divided among jurisdictions and service districts within a county.

A city's SOI can be either contiguous with or go beyond the city's boundary. A city is responsible for planning for all areas within its SOI. The SOI is considered the probable future city boundary. Spheres of Influence must be considered in the regional housing needs allocation process via a "rule" in the Regional Housing Needs Allocation method, if there is projected growth within a city's SOI. Most SOI areas within the Bay Area are anticpated to experience growth. The primary SOI rule for the RHNA method is that each local jurisdiction with land-use permitting authority over its SOI should plan for all the housing needed to accommodate housing growth, existing employment and employment growth within their SOI.

A 100 percent allocation of the housing need to the jurisdiction that has land use control over the area would ensure that the jurisdiction that plans

for accommodating the housing units also receives credit for any units built during the RHNA period.

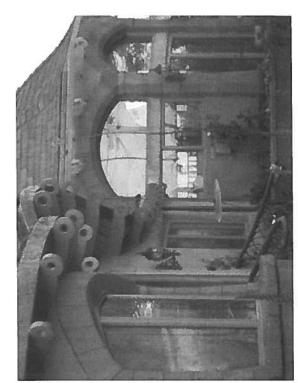
There are variations in the Bay Area in terms of whether a city or county has jurisdiction over land use and development within unincorporated SOIs. In response to these variations, the following SOI rules apply:  In Napa, Santa Clara, Solano, and Sonoma Counties, the allocation of housing need generated by the unincorporated SOI will be assigned to the cities.

 In Alameda and Contra Costa Counties, the allocation of housing need generated by the unincorporated SOI will be assigned to the county.
 In Marin County, 75 percent of the allocation of housing need generated by the unincorporated SOI will be assigned to the city; the remaining 25 percent will be assigned to the county.

These rules reflect the general approaches to SOIs in each county. Adjustments may be needed to better reflect local conditions. To allow flexibility, the methodology includes the following criteria:

 Adjustments to SOI allocations shall be consistent with any pre-existing written agreement between the city and county that allocates such units, or

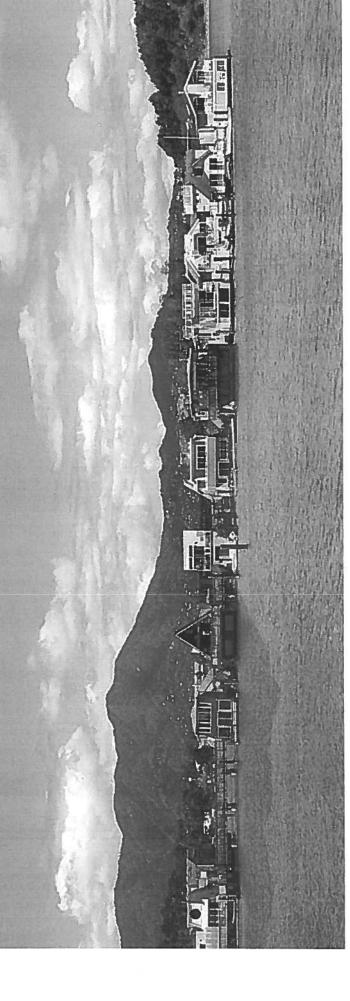
 In the absence of a written agreement, the requested adjustment would allocate the units to the jurisdiction that has permitting authority over future development in the SOI. Two requests for SOI allocation adjustments arose during the RHNA revision period. These requests were between the County of Santa Clara and the cities of Palo Alto and Mountain View. The final RHNA numbers, in Appendix A, reflect adjustments made to each city and to Santa Clara County.





units. Both of these requirements ensure that all jurisdictions in the the same income distribution as initially allocated when transfering region provide for their "fair share" of affordable housing. Through When transfering units, jurisdictions are required to retain some a transfer, a city or county may not abdicate its responsibility to very-low and low income units. Jurisdictions also must maintain provide affordable units.

The Mouseboats. Sausalito, CA. Photos by Cynthia Warren



## Transfer of Units

After the initial allocation, each local jurisdiction may request that it be allowed to transfer units with one or more willing partners. The transfer must take place in a way that maintains the total need allocation amongst all transfer parties, maintains income distribution of both retained and transferred units, and includes a package of incentives to facilitate production of housing units. The transfer rule allows for the transfer of housing need between willing jurisdictions in conjunction with financial and non-financial resources. It maintains the integrity of the state's RHNA objectives by preventing any jurisdiction from abdicating its responsibility to plan for housing across all income categories.

Request for transfer of RHNA allocations between jurisdictions must adhere to the following provisions:  Have at least two willing partners and the total number of units within the group requesting the transfer cannot be reduced.

2. Include units at all income levels in the same proportion as initially allocated.

All members of the transfer group must retain some allocation of very low and low income units. 4. The proposed transfer must include a specifically defined package of incentives and/or resources that will enable the jurisdiction(s) receiving an increased allocation to provide more housing choices than would otherwise occur absent the transfer and the accompanying incentives or resources.  If the transfer results in a greater concentration of very low or low income units in the receiving jurisdiction, the effect must be offset by findings by the members of the transfer group that address the RHNA objectives.

For example, the findings might include: (a) there is such an urgent need for more housing choices in those income categories that the opportunity to effect more housing choices in these categories offsets the impacts of over-concentration; or (b) the package of incentives and/or resources are for mixed income projects; or (c) the package of incentives and/or resources are housing for very low or low income households

being relocated for rehabilitation of existing very low or low income units; or (d) the package of incentives and/or resources are for additional units that avoid displacement or "gentrification" of existing communities.

For the transfer of very low and low income units, there are restrictions that ensure the longterm affordability of the transferred units. 7. Transfers must comply with all other statutory constraints and be consistent with the RHNA objectives.



# Innovative, Sustainable Micro-Infill

accommodate its new housing allocation, going When in doubt about how your city may small may be an option.

Temescal District of Oakland. It is a mere 360 Bottom photo is of a "rammed earth" cottage, located in the backyard of a home in the square feet.

brought in earth from Nunn's Canyon Quarry, quarry fine, technically a waste material. This Rather than use standard wood studs, owners painting and are immune to pests and rotting. building technique has been used around the exposed 1-foot thick walls that never need world for centuries, but it's more typically associated with rural settings. Results are located in Sonoma. The earth is made of

To learn more, see www.sfgate.com/cgi-bin/article.cgi?file=/gate/ archive/2005/05/06/carollloyd.DTL



## San Mateo Subregion

The County of San Mateo, in partnership with all twenty cities in the county, formed a subregion. The formation of a subregion, for the purposes of conducting the RHNA, is allowed by state law.

The San Mateo subregion designated the City/ County Association of Governments (C/CAG) as the entity responsible for coordinating and implementing the subregional RHNA process. Upon the State's determination of the total regional need, as required by law, ABAG assigned a share of the regional need to the San Mateo subregion. According to the law, the subregion's share is to be "in a proportion consistent with the distribution of households" from 2007-2014 in *Projections 2007*. San Mateo's share of units was also assigned by income category. The income distribution of income.

San Mateo County's household growth during the RHNA period, 2007-2014, is estimated at 12,184 households. Household growth in the region over the same period is estimated at 166,060. San Mateo County's regional share of household growth is 7.3 percent.

Applying this percent to the total regional housing need of 214,500 units gives San Mateo County a minimum subregional housing need assignment of 15,738 units, or 7.3 percent of the total regional need.

## Subregion Allocation Method

The San Mateo subregion was responsible for completing its own RHNA process. Their process paralleled, but was separate from, the Bay Area's RHNA process. San Mateo created its own methodology, issued draft allocations, and handled the revision and appeal processes. They also issued final allocations to members of the subregion.

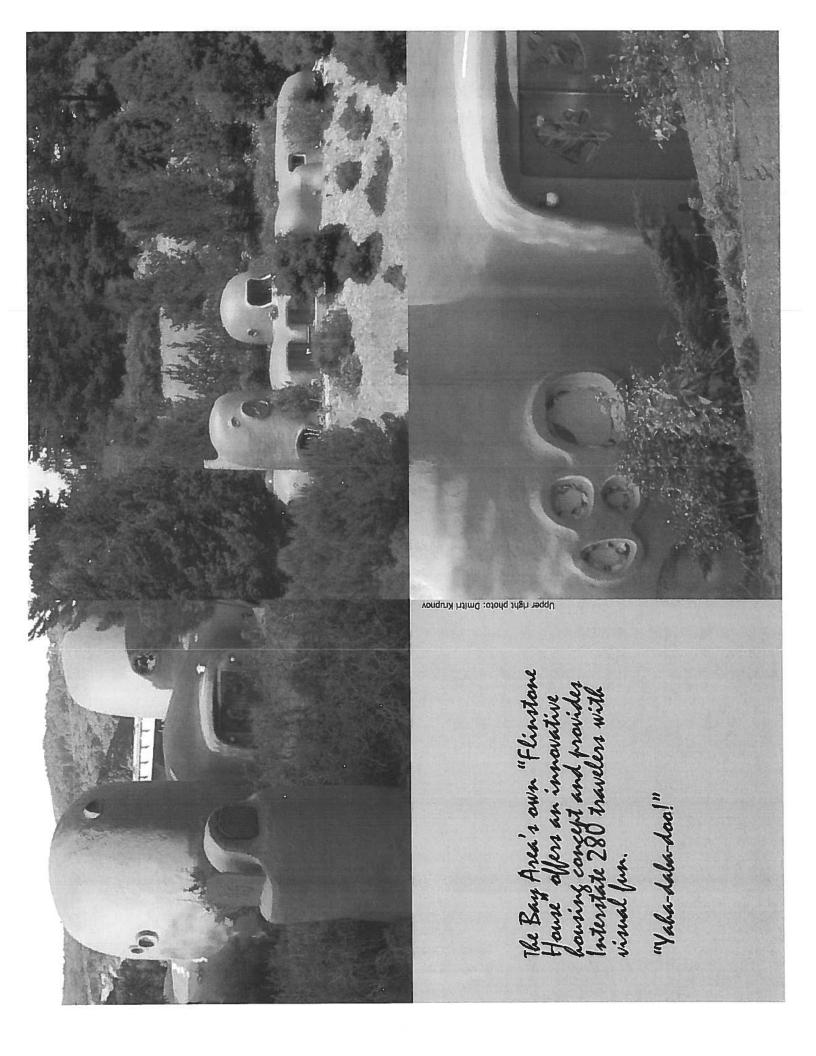
Although the subregion worked independently of the regional RHNA process, ABAG is ultimately responsible for ensuring that all of the region's housing need is allocated. Thus, if the subregion were to fail at any point in its attempt to develop a final RHNA allocation for the subregion, ABAG would have had to complete the allocation process for the members of the subregion.

The San Mateo subregion housing allocation method mirrored ABAG's final method. The same factors and weights were used, as documented on page 23 of this report. Once units were allocated, using the ABAG formula, several cities in San Mateo agreed to transfer units. Transfering cities were subjected to the same rules regarding transfers, as listed on page 37.

Final city-level allocations for the San Mateo Subregion are listed in Appendix A.

## San Mateo Subregion Allocation

3,588 2,581	3,038 6,531	15,738
Very Low Low	Moderate Above-Moderate	Total



## **Concluding RHNA**

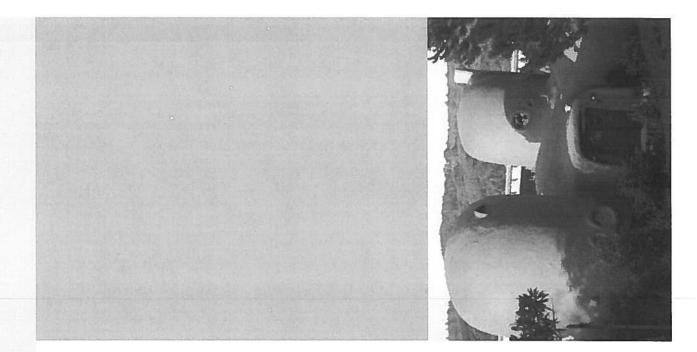
The Regional Housing Needs Plan, as fully described in this document, took over two years to develop. This plan's success is largely due to the commitment and hard work of the many individuals involved. We arrived at the final methodology only after numerous committee and public meetings that took place throughout the region. Outside of committee or public meetings, we provided information to people over the telephone, through newsletters, emails and our web site.

This outreach generated many comments on our regional population, household and job forecast, *Projections 2007.* We also received feedback on numerous draft RHNA methodologies. Even now, with our method complete and after all the housing needs numbers have been allocated, our outreach continues. There remains great interest in the RHNA process, how the allocation formula works and what is now required of local governments. Once draft allocations for individual jurisdictions were produced, only 19 of the Bay Area's 109 jurisdictions asked for revisions to their numbers. Out of those requests, one was granted. Five of the 19 jurisdictions then appealed their allocations

to an ABAG Executive Board RHNA Appeals Subcommittee. This sub-committee was made up of local elected officials. Of the five appeals, one was granted. Another appeal was resolved through a trade made between jurisdictions. Limited appeals are evidence of a highly constructive RHNA process. While RHNA may have its difficulties and be perceived as controversial in many jurisdictions, our process was widely recognized as fair, professional, cooperative and open. And in the end, many would agree that this 2007-2014 RHNA is progressive in addressing our region's significant housing, transportation and environmental issues.

We hope you have found this report useful in explaining all aspects of RHNA. If further information is needed, please visit our Bay Area RHNA web site at: www.abag.ca.gov/planning/ housing needs.

Thank you.



#### Endnotes

<sup>1</sup> All data in the "San Francisco Bay Area" chapter, except where noted, is from Association of Bay Area Governments, *Projections 2007* 

Affordability percentages calculated using California Association of Realtors "First-time Buyer Housing Affordability Index", Available at <u>http://www.car.org/index.php?id=MzcxMTU=</u> Note: Formula adjusted to reflect no more than 30 percent of income toward total mortgage vs. recommended 40 percent; May 2008 <sup>3</sup> California Home Sale Activity by City, Home Sales Recorded in the Year 2007, DQNews, Available at <u>http://www.dgnews.com/Charts/Annual-Charts/CA-City-Charts/ZIPCAR07.aspx</u>

<sup>4</sup> California State Department of Finance, E-5 Report, City/County Population and Housing Estimates, January 1, 2008 <sup>5</sup> All transportation data cited in the "Transportation" section comes from the Metropolitan Transportation Commission, *Bay Area Transportation: State of the System 2006*, p. 3-4

<sup>6</sup> Affordability percentages calculated using California Association of Realtors "First-time Buyer Housing Affordability Index", Available at <u>http://www.car.org/index.php?id=MzcxMTU=</u> Note: Formula adjusted to reflect no more than 30 percent of income toward total mortgage vs. recommended 40 percent; May 2008

7 Metropolitan Transportation Commission, Transportation 2030, percentages calculated from 2005-2030 <sup>8</sup> Bay Area Air Quality Management District. BAAQMD Bay Area 2005 Ozone Strategy. January 2006.

<sup>9</sup> Bay Area Air Quality Management District. Ambient Air Quality Standards & Bay Area Attainment Status. January 2007. Available at: www.baaqmd.gov/pln/air\_quality/ambient\_air\_quality.htm.

<sup>10</sup> Cummins, S. K. and Jackson, R. "The Built Environment and Children's Health." 2001. *Pediatric Clinics of North America* 48(5): 1241-1252. <sup>11</sup> California Department of Transportation. 2004 HICOMP Report. June 2006: California Department of Transportation, District 4, Office of Highway Operations. "Information Memorandum: Year 2002 Bay Area Freeway Congestion Data." 2003

<sup>12</sup> 2005 American Community Survey. U.S. Census Bureau.

<sup>13</sup> Ewing, Reid, Bartholomew, Keith, et al. "Growing Cooler: The Evidence of Urban Development on Climate Change." Urban Land Institute, p. 4.

<sup>14</sup> California Department of Housing and Community Development, Overview of Housing Element Law, Available at: http://www.hcd.ca.gov/hpd/housing\_ element/index.html <sup>15</sup> Fassinger, Paul, 2007-2014 Regional Housing Need Allocation, Staff memo to ABAC's Executive Board, April 17, 2007

<sup>16</sup> Very-low income is 50 percent or less of area median income (AMI), lowincome is 50 to 80 percent of AMI, moderate-income is 80 to 120 percent of AMI, above-moderate is 120 percent or more of AMI.

<sup>17</sup> For more details about these sections of the methodology, see ABAG's website at <u>www.abag.ca.gov/planning/housingneeds.</u>

<sup>18</sup> Adopted by ABAG's Executive Board, January 2007.

Appendix A: Regional Housing Needs Allocation, 2007 to 2014

	Verv Low. <50%	Low. <80%	Moderate, <120%	Above Moderate	Total
AreaTotal	48 840	35.102	41.316	89.242	214.500

San Francisco Bay Area Housing Needs Allocation, 2007 to 2014

Alameda County Housing Needs Allocation, 2007 to 2014

	Verv Low. <50%	Low. <80%	Moderate <120%	Above Moderate	Total
Alameda	487	329	392	843	2.046
Alhanu	64	43	52	117	276
Barkalav	328	474	549	1.130	2.431
Dublin	1 092	661	653	924	3.330
Fmervville	186	174	219	558.	1.137
Fremont	1.348	887	876	1.269	4.380
Havward	768	483	569	1 573	3, 393
l ivermore	1 038	660	683	1.013	3.394
Newark	757	160	155	291	863
Oakland	1 900	2.098	3.142	7.489	14.629
Diadmont	13	10	V	6	40
Placanton	1_076	728	72.0	753	3,277
San Leandro	368	228	277	757	1.630
Ilnion City	561	391	380	612	1.944
Unincorporated	536	340	400	891	2.167
Alameda Total	10.017	7.616	9.078	18.226	44.937



Contra Costa County Housing Needs Allocation, 2007 to 2014

	Verv 1 nw <50%	Low. <80%	Moderate. <120%	Above Moderate	Total
Antioch	516	339	381	1.046	2.282
Brentwood	717	435	480	1.073	2.705
Clauton	49	56	33	34	151
Concord	639	426	498	1.480	3.043
Danvilla	196	130	146	111	583
El Carrito	93	59	80	199	431
Herrites	143	74	73	163	453
afavette	113	22	80	91	361
Martinez	261	166	179	454	1.060
Worden	73	47	52	62	234
Oahlan	219	120	88	348	775
Orinda	20	48	55	45	218
Dinala	83	49	48	143	323
Dittchurd	377	273	296	931	1.772
Pleasant Hill	160	105	106	257	628
Richmond	391	339	540	1,556	2.826
San Pahlo	22	38	60	178	298
San Ramon	1.174	715	740	834	3,463
Walnut Creek	456	302	374	826	1.958
Unincorporated	815	598	687	1.408	3.508
Contra Costa Total	K R17	A 375	4 996	11 239	77 072

Marin County Housing Needs Allocation, 2007 to 2014

	Verv Low. <50%	Low. <80%	Moderate. <120%	Above Moderate	Total
Belevedere	LC.	4	4	4	17
Corto Madera	ęę	3.8	46	92	244
Fairfay	23	12	19	54	108
Larksnur	06	55	75	162	382
Mill Vallev	74	54	68	96	292
Novato	275	171	221	574	1,241
Russ	æ	ę	5	œ	77
San Anselmo	26	19	21	47	113
San Rafael	262	207	288	646	1,403
Sausalito	45	30	34	56	165
Tiburon	36	21	27	33	117
Unincorporated	183	137	169	284	773
Marin Total	1 095	754	677	2.056	4.882



Napa County Housing Needs Allocation, 2007 to 2014

	Verv 1 nw < 50%	1 nw. <80%	Moderate. <120%	Above Moderate	Total
American Canvon	169	116	143	300	728
Calistoga	17	++	18	48	94
Nana	466	295	381	882	2.024
St Helena	Ur Ur	21	25	45	121
Ynintville	16	15	16	40	87
Unincornorated	181	116	130	224	651
NapaTotal	879	574	713	1.539	3.705

San Francisco County Mousing Needs Allocation, 2007 to 2014

	Verv Low. <50%	Low. <80%	Moderate. <120%	Above Moderate	Total
San Francisco	6.589	5.535	6.754	12.315	31,193
San Francisco Total	6.589	5.535	6.754	12.315	31.193

4
201
0
7 t
00
. 2
0
atí,
loc
$\overline{\langle}$
ds,
çç
Ż
L 0
50
using Bring
ous
Hous
ty Hous
ounty Hous
ty Hous
eo County Hous
o County Hous
teo County Hous
teo County Hous

	Verv Low. <50%	Low. <80%	Moderate. <120%	Above Moderate	Total
Atherton	19	14	16	34	83
Betmont	91	65	77	166	399
Brisbane	91	66	77	167	401
Burlingame	148	107	125	270	650
Colma	15	11	13	26	65
Daly City	275	198	233	501	1.207
East Palo Atto	144	103.	122	261	630
Foster City		80	94	201	486
. Half Moon Bav	63	45	53	115	276
Hillshorough	20	14	17	35	86
Mento Park	226	163	192	412	993
Millbrae	103	74	87	188	452
Pacifica	63	45	53	114	275
Portola Vallev	17	12	14	31	74
Redwood City	422	304	358	777	1,856
San Bruno	222	160	188	403	973
San Carlos	137	98	116	248	599
San Mateo	695	500	589	1,267	3,051
South San Francisco	373	268	315	679	1,635
Woodside	10	7	œ	16.	41
Unincorporated	343	247	291	625	1.506
San Mateo Total	3.588	2.581	3.038	6.531	15.738



_h_
N
0
20
Q
nquar bu
007
2
5
<u> </u>
<u> </u>
0
ŏ
$\triangleleft$
1
<u>n</u>
0
0
~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~
60
ousin
ŝ
Ē
ر <del>د.</del> بله
5
. 0
()
Ň
G
co.
$\overline{()}$
$\bigcirc$
Ð
يَد
iñ
U)

	Verv Low. <50%	Low. <80%	Moderate, <120%	Above Moderate	Total
Camphell	199	122	158	413	892
Cupertino	341	229	243	357	1.170
Gilrov	319	217	271	808	1,615
Inc Althe	86	66	79	74	317
I ne Altrie Hille	77	19	22	¢,	81
I ne Gatne	154	100	122	186	562
Milnitac	689	421	441	936	2,487
Monte Sereno	13	6	<b>-</b>	8	41
Morgan Hill	317	749	246	500	1.312
Mountain View	571	388	488	1.152	2 599
Dalo Alto	690	543	641	986	2.860
San Inco	7 751	5.377	6.198	15.450	34.721
Santa Clara	1 293	914	1_002	2,664	5.873
Saratooa	06	68	77	57	292
Sunnwale	1.073	708	776	1.869	4.426
Unincorporated	253	192	232	413	1.090
Canta ClaraTotal	13 878	9 567	11.007	25.886	60.338

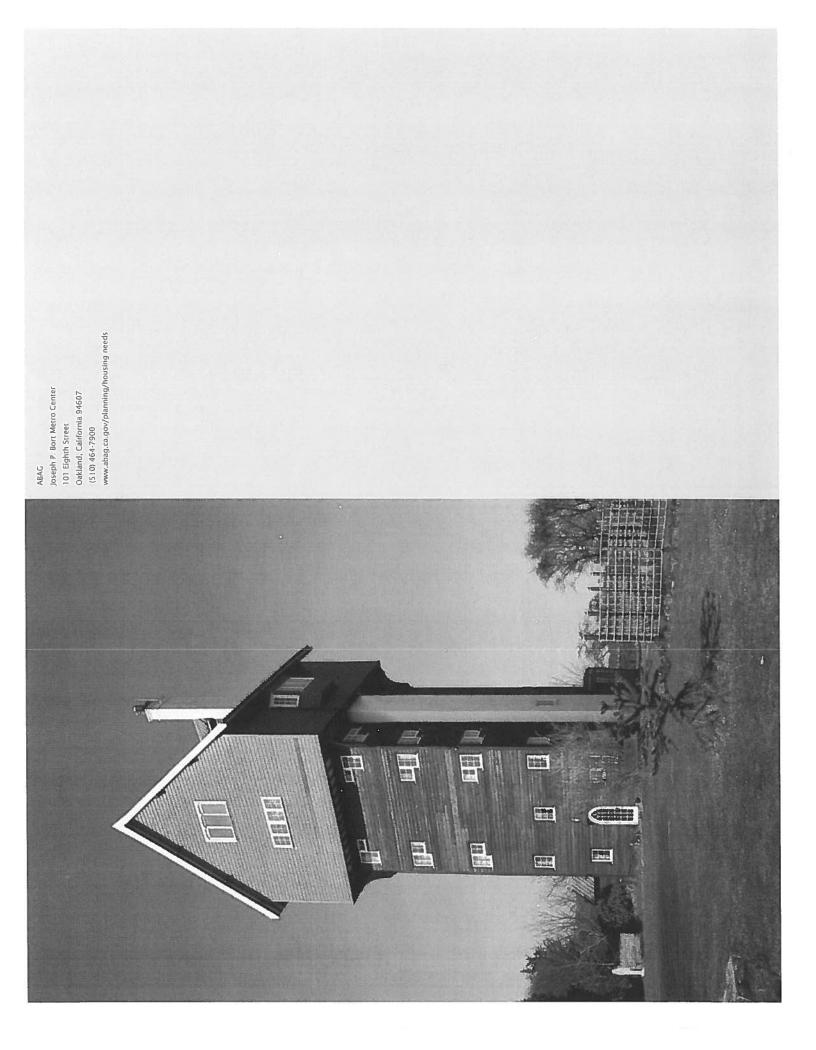
Solano County Mousing Needs Allocation, 2007 to 2014

	Verv I ow. <50%	1 ow. <80%	Moderate. <120%	Above Moderate	Total
Ronicia	147	66	108	178	532
Divon	197	98	123	310	728
Fairfield	873	562	675	1.686	3.796
Rin Victa	213	176	207	623	1.219
Suisin City	173	109	94	234	610
Vacavillo	754	468	5	1.164	2.901
Vallein	ለ5ና	468	563	1.409	3.100
Ilnincornorated	26	16	00	39	99
Solano Total	3.038	1.996	2.308	5.643	12.985



4-
-
20
8
7
8
5
Ľ,
t.
СЭ
0
$\triangleleft$
n N
ŝ
->
-
511
13
ō
1
ty
n
, 0,
$\bigcirc$
еш
0
10
(V)
Jonoma County Housing

	Verv 1 nw <50%	1.ow. <80%	Moderate. <120%	Above Moderate	Total
Cloverdale	71	61	81	204	417
Cotati	67	36	45	109	257
Healdshire	71	48	55	157	331
Defaluma	577	352	370	701	1.945
Rohnert Park	371	231	273	679	1.554
Santa Roca	1 520	966	1.122	2.896	6.534
Cabactonol	22	28	29	87	176
Sonoma	73	ۍ د ر	69	156	353
Windsor	198	130	137	254	719
Unincorporated	319	217	264	564	1.364
Sonoma Total	3 244	2.154	2.445	5.807	13.650





### **Draft Transportation Investment Strategy**

U
0
ā
U
2
9
7
Ø
5
<b>h</b> a
5

# Improve the Bay Area economy.

Provide better access to housing and transportation for people from all walks of life

# 2. Support housing density.

If it means better economic opportunities, improved transit, or if it helps to protect open space in Bay Area

# 3. Highest support for transit expansion and maintaining roads.

Extending commuter rail, maintaining highways and roadways, and improving public transit for lowncome residents are the highest rated transportation priorities

## Land-use strategies and transportation investments should aim to reduce driving and greenhouse gas emissions. 4

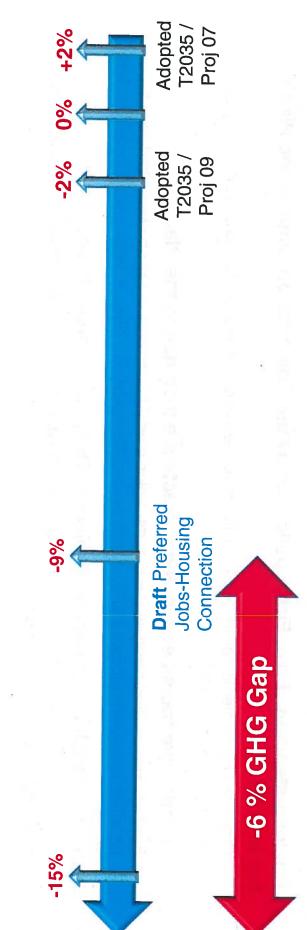
Allow new affordable housing, offices, and shops to be built in city / town centers near public transit

## The Bay Area's transit system needs improvements. <del>ີ</del> ທີ

Support transit that is more frequent, affordable, cleaner and safer with connections that work better for local and intermodal systems



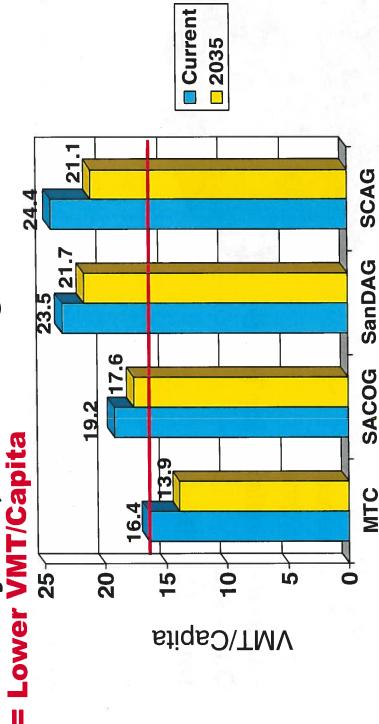




- Bay Area's target for 2020 (-7 %) is achieved
- Planned transportation projects have a marginal effect on GHG emissions
- Operations & Maintenance
- Cost: \$242 B (88%)
- GHG: Underpins GHG reductions from land use strategy
- Capacity-Increasing Projects
- Cost: \$35 B (12%)
- GHG: regional effects vary slightly by mode and by project









- Sacramento household and 50% less than the average SoCal household; and, The average Bay household must travel 30% less than the average
- New Bay Area households must travel about 75% less than existing households.

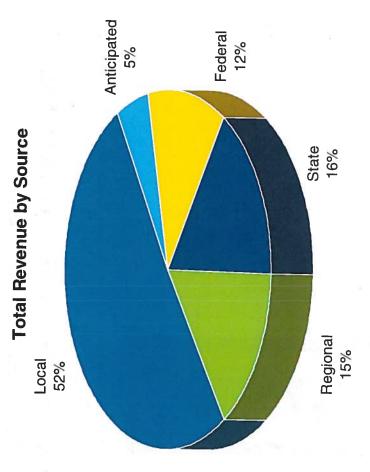


r

S



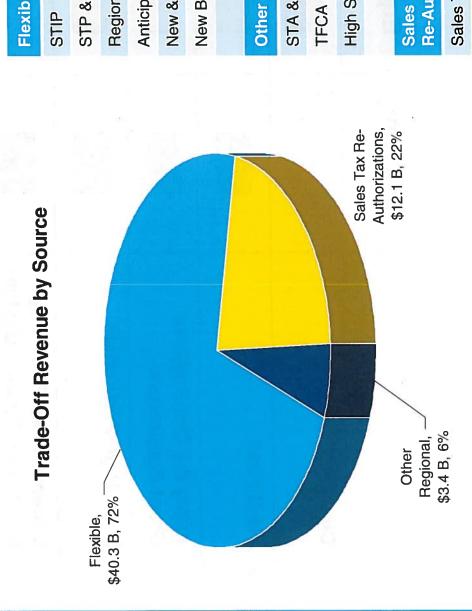
- Committed Revenue \$186 B
- Conditioned Discretionary \$35 B
- \$34 B (97%) to Transit Operating and Maintenance
- \$1 B (3%) to Other
- Revenues Available for Trade-Offs - \$56 B
- Total \$277 B



\*represents an \$11 billion increase from February (\$9 billion for regional and Santa Clara express lanes and \$2 billion for San Francisco cordon pricing).

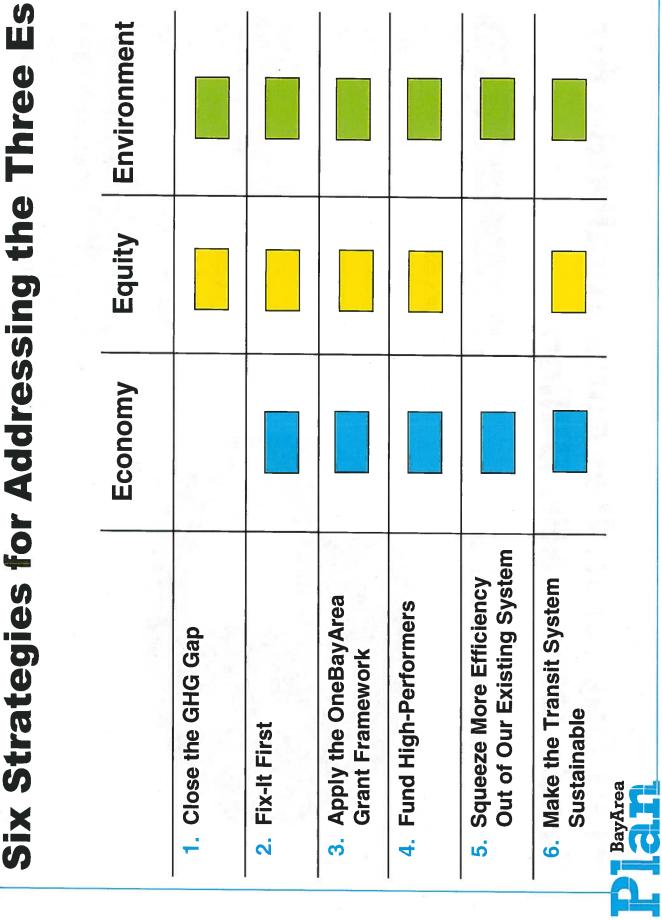


## Plan Bay Area Revenue Available for Trade-Offs -- \$56 Billion **Revenue Forecasts**



Flexible	<pre>\$ Billions, YOE\$</pre>
STIP	8.6
STP & CMAQ	7.4
Regional Gas Tax	5.1
Anticipated	14.0
New & Small Starts	2.5
New Bridge Tolls	2.7
Subtotal	\$40.3
Other Regional	<pre>\$ Billions, YOE\$</pre>
STA & JARC	0.8
TFCA & AB 434	0.1
High Speed Rail	2.5
Subtotal	\$3.4
Sales Tax Re-Authorization	\$ Billions, YOE\$
Sales Tax	\$12.1
<b>Grand Total</b>	\$55.8

BayArea



**Overall Approach** 

# Close the GHG Gap

# **Climate Policy Initiatives**

### **Proposed Approach**

 Implement innovative policy initiatives to help region achieve and possibly exceed its greenhouse gas emission reduction targets

# **Related Performance Targets**

- Reduce per-capita GHG emissions from cars and light-duty trucks
- Reduce VMT per capita
- Increase non-auto mode share

# Trade-Off Investment Proposal

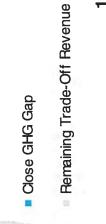
#### \$0.7 Billion

%









%66

Two Investment Options - Option A Investment Strategy #1:

### **Clean Vehicles/Smart Driving Emphasis Climate Policy Initiatives:**

Policy Initiative	Cost (in millions of YOE\$)	Per-Capita CO <sub>2</sub> Emissions Reductions (2035)
Electric Vehicle Acceleration •Regional Public Charger Network	\$240	-1%
Vehicle Buy-Back & Plug-In or Electric Vehicles Purchase Incentives	\$180	-1%
Car Sharing •For Profit and Non-Profit Car Sharing (includes clean vehicle car sharing) •Peer-to-Peer Car Sharing (includes clean vehicle car sharing)	\$4	-1%
Vanpool Incentives	\$6	-1%
Clean Vehicles Feebate Program	\$25 for admin costs	-1%
Smart Driving Strategy •Tire Pressure Cap Rebate Program •In-vehicle Fuel Economy Meters Rebate Program •Education Campaign	\$23 <b>0</b>	-2%
Total	\$685	-7%



Two Investment Options – Option B

#### **Climate Policy Initiatives: Fuel Efficiency Emphasis** Option m

Policy Initiative		Cost (in millions of YOE\$)	Per-Capita CO <sub>2</sub> Emissions Reductions (2035)
55 mph Speed Limit on Bay Area Freeways		\$260	-6%
Smart Driving Strategy •Tire Pressure Cap Rebate Program •In-vehicle Fuel Economy Meters Rebate Program •Education Campaign		<b>\$230</b>	-2%
	Total	\$490	-8%



#### Investment Strategy #2: Fix-It First

#### **Proposed Approach**

- Continue T2035 Functional Investment Approach
- Maintain existing pavement conditions
- Fully fund revenue vehicles and 70%+ of total other Score 16 assets
- Fully fund operating needs for existing transit services
- Invest in State Bridge Rehab & Retrofit
- Falls short of new Plan Bay Area targets (see below)

# **Related Performance Targets**

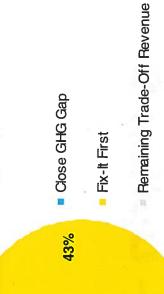
- Maintain transportation system
- Local Streets & Roads Pavement Condition Index of 75 and corresponding Non-Pavement State of Repair
   Transit Behab – Benlace All Accets by End of I leaful
  - Transit Rehab Replace All Assets by End of Useful Life
    - Reduce distressed state highway lane miles

# Trade-Off Investment Proposal

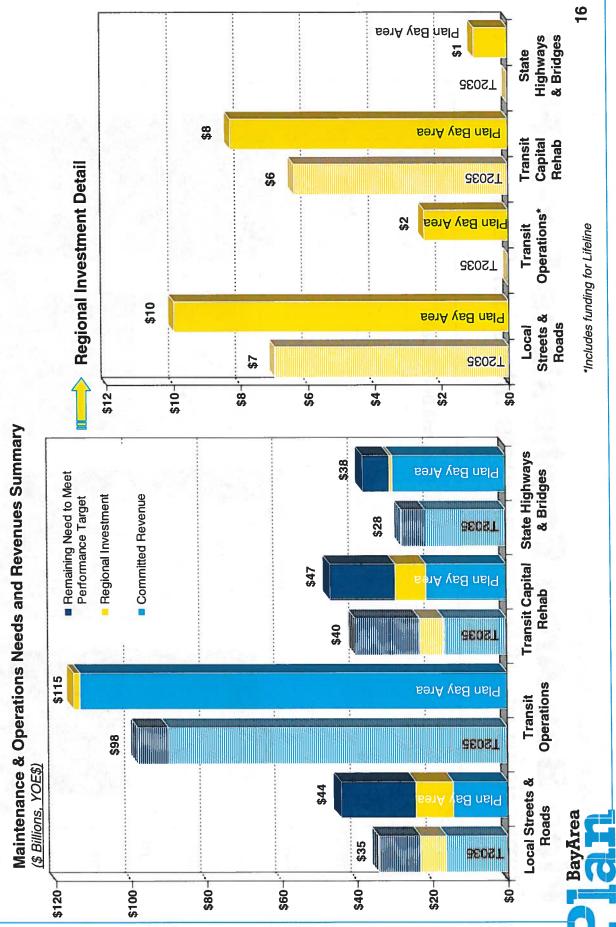
#### \$24 Billion







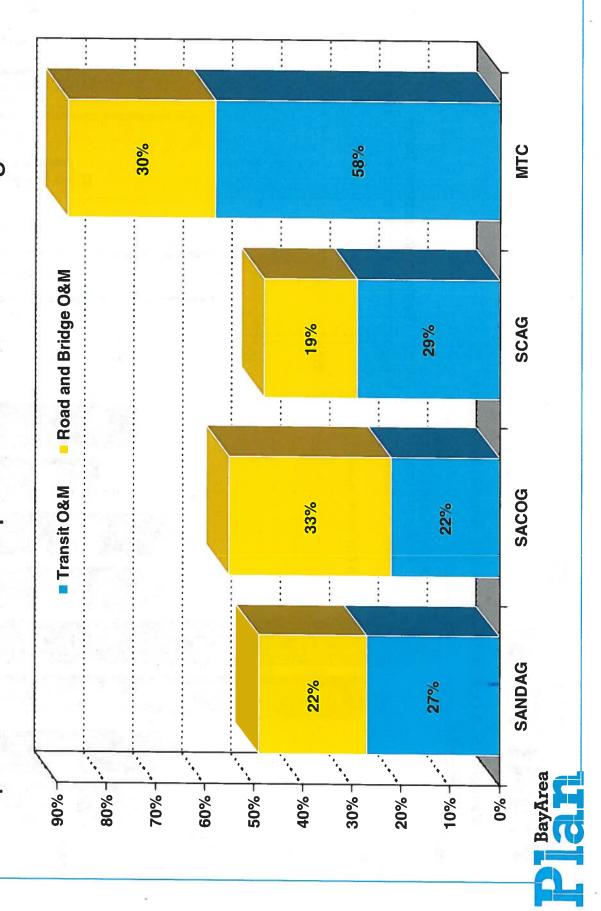
56%



First 

Investment Strategy #2:

Plan Bay Area Emphasizes Fix-It First Comparison of O&M Expenditures with other Regions Investment Strategy #2:





BayArea

100

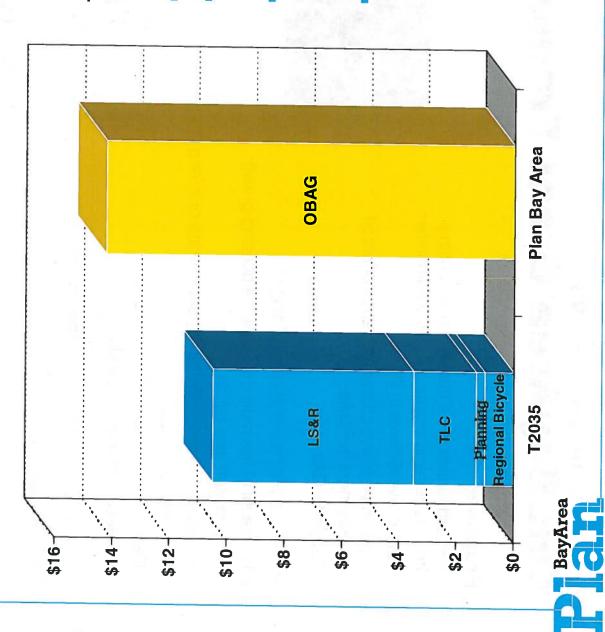
\*Overlaps with Fix-It First LSR

26%

Remaining Trade-Off Revenues

OneBayArea Grant\*

# **OneBayArea Grant Framework** Investment Strategy #3:

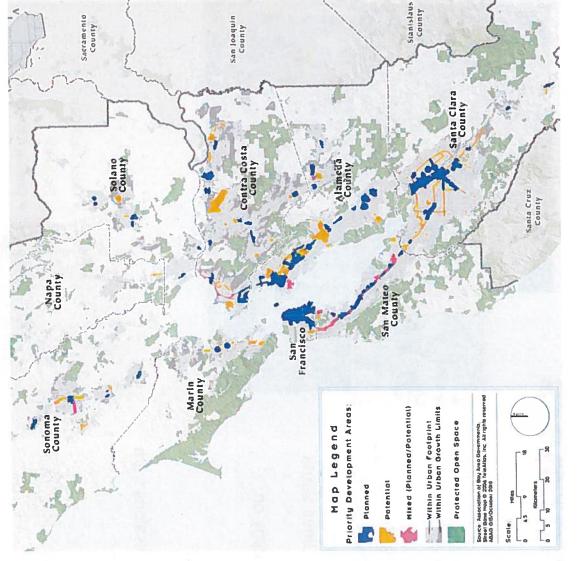


#### Initiatives Include:

- Regional Bicycle
   Program
- **Regional Planning**
- Transportation for Livable Communities (TLC)
  - Local Streets and Roads (LS&R) Operations and Maintenance
    - OneBayArea Grant (OBAG)

**Focus Growth Around Transit** Investment Strategy #3:

- SCS Forecast Bay Area growth in Priority Development Areas:
- 75% new housing
- 64% new jobs
- More intense development near high quality transit
- A well maintained multimodal transportation system is fundamental to the success of the Sustainable Communities Strategy





# Fund High-Performers

#### **Proposed Approach**

- Develop regional funding strategy to implement highperforming projects that received performance score of:
- Benefit / Cost >= 10 and Targets Score >= 2 or
- Benefit / Cost >= 5 and Targets Score >= 6
- Set the stage for next generation of capital transit investments and identify New Starts / Small Starts candidates
- Early High Speed Rail investment strategy on Peninsula Corridor

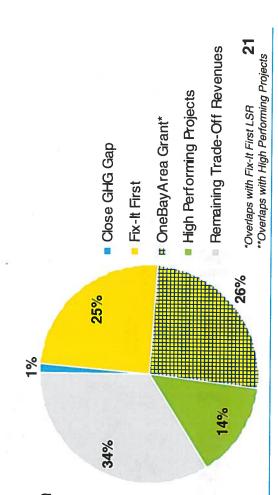
# **Related Performance Targets**

- Increase Gross Regional Product
- Reduce per-capita greenhouse gas emissions from cars and light-duty trucks
  - Reduce VMT per capita

#### Trade-Off Investment Proposal \$8 Billion







### Roughly Half of Projects Open or in Construction **Resolution 3434 Project Status:** Investment Strategy #4:

	Project Cost	Status
Project		0000
Caltrain Express: Baby Bullet	871	
Regional Express Bus	102	Open
BADT to Werm Shrinds	890	890 Construction
DANT to Watth Optimize Front Contro Contro BART Extension (ABART)	462	Construction
	1.589	Construction
Iransbay Iransii Ueniei. Friase I	484	
BAH I/Uakiana Airport Connector	360	
Sonoma-Marin Hail IOS		1.1
Expanded Ferry Service to South San Francisco (Berkeley,	_	
Alameda/Oakland/Harbor Bay, Hercules, and Richmond; and other	180	180 Construction
improvements)		Construction
MUNI Third Street Light Rail Transit Project - Central Subway	1,5/8	
BART: Warm Springs to Berryessa	2,330	
Downtown to East Valley: Light Rail & Bus Rapid Transit Phases 1 & 2	559	
Caltrain Electrification	785	
DADT: Dormosca to San Jose/Santa Clara	3,962	Approved Env
Transhav Transit Center/Caltrain Downtown Extension: Phase 2	2,596	
AC Transit Borkelev/Dakland/San Leandro Bus Rabid Transit	205	Env
AC Italist Derivery Canadia Car Science	125	Env
Taillow Transit Access Improvements to/from BART	168	Env
I II-Valley I I alisit Access improvements to the contribution	41	Env
	427	Env
S. Flidse	701	Env .
	254	Env
Capitol Corridor: Phase 2 Enhancements	150	TBD
	\$ 18 076	



	ority	LO LO
	riorit	Rep
		S L
	9	atu
		Sti
		<b>rts</b>
4	it Expansion	<b>Starts Status Report</b>
¥ X	B	- Contra 1
teg	X	ma
vestment Strategy #4:	ÍÌ	/ Starts / Small
t S		ts
nen	S	tar
str		S ≥
nve	Transit	New



transit expansion projects and has secured commitments for over \$1 The Bay Area is poised to begin construction on a number of major billion in federal funding:

Project Funding Plans (Dollars in Millions)	Dollars in	Millions)			Federal
	Local	State	Federal	Total	Share
<b>BART to Silicon Valley</b>	\$1,179	\$251	\$900	\$2,330	39%
San Francisco Central Subway	\$488	\$632	\$1,107	\$2,227	20%
Van Ness Bus Rapid Transit (BRT)	\$30	\$2	\$93	\$126	74%
East Bay BRT	\$78	\$50	\$77	\$205	38%

- On March 12, VTA executed its full funding grant agreement (FFGA) for the \$900 million federal share
- SFMTA expects to receive its FFGA for \$942 million by summer 2012
- 28-year Plan Bay Area, after accounting for the two New Starts projects Roughly \$2.5 billion in New Starts / Small Starts is estimated over the above



New Starts / Small Starts: **Region's Next Generation** Investment Strategy #4:

Evaluated existing Resolution 3434 projects and high performers against the following criteria:

<ul> <li>TOD Potential</li> </ul>	<ul> <li>Equity Targets</li> </ul>	<ul> <li>Regional Connectivity</li> </ul>	
<ul> <li>Benefit / Cost Analysis</li> </ul>	<ul> <li>Plan Bay Area Targets</li> </ul>	<ul> <li>Readiness</li> </ul>	<ul> <li>Local Match</li> </ul>

Two "Big" Starts and Three "Small" Starts emerged highest in ranking

		Project A	roject Assessment			1 3 IL			
Project	Cost (YOE\$, Millions)	Benefit/ Cost	Plan Bay Area Targets	Readiness	Local Match	TOD PotentialIOD Potential(Jobs + Housingwithin 1/2 milewithin 1/2 mileLocal Matchof station/ stop)Equity TargetsConnectivity	Meeting Equity Targets	Regional Connectivity	Overall (H/M/L)
BART to San Jose/Santa Clara (Phase 2: Berryessa to Santa Clara)	3,962	Ω	7.0	65% Design	34%	34,071	т	т	Ŧ
Transbay Transit Center - Phase 2B (Caltrain Downtown Extension)	2,596	4	2.5	30% Design	10%	122,498	H	т	т
AC Transit Grand-MacArthur BRT	37	18	5.5	No Env	15%	89,986	н	т	H
Van Ness BRT	126	9	6.5	Env Expected 2012	21%	185,054	т	Σ	Ŧ
AC Transit East Bay BRT	205	S	5.5	Env Expected 2012	8%	365,075	т	Σ	Ŧ



New Starts / Small Starts: **Region's Next Generation** Investment Strategy #4:

Proposed Plan Bay Area funding plan for 5 projects, including New Starts / Small Starts recommendation totaling ~\$1.8 billion:

"Big" Starts					<b>Proposed Funding Strategy</b>	ing Strategy		
	Cost				N. Otos	Sales Tax		
	(YOE\$,	Committed				Extensions/		Joint
Project	Millions)	Funding	New Starts	New Bridge Tolls	HSR	Other Local	Express Lanes Development	Development
BART to San Jose/Santa Clara (Phase								
2: Berryessa to Santa Clara)	3,962	1,504	1,100		378	298	682	0
Transbay Transit Center - Phase 2B			11 7.4 M.S.			V. 11 T 15.		
(Caltrain Downtown Extension)	2,596	639	650	300	557	350		100
TOTAL	6,558	2,143	1,750	300	935	648	682	100
	1 1 1 1							

"Small" Starts	A LANDARY		Proposed	Proposed Funding Strategy
- 23	Cost			
	(YOE\$,	Committed		New/ Augmented
Project	Millions)	Funding	Small Starts	Sales Tax
AC Transit Grand-MacArthur BRT	37	0	30	7
Van Ness BRT	126	67	30	29
AC Transit East Bay BRT	202	115	28	63
TOTAL	368	181	88	66

Proposal retains ~\$660 million reserve for projects in planning stages for future consideration and discussion



## Transit Expansion: California High-Speed Rail Peninsula Corridor Early Investment Strategy Investment Strategy #4:

 On March 28, 2012, MTC approved an MOU and \$1.5 billion funding strategy for an early investment strategy for the Peninsula corridor

Program Costs (in \$ millions, year of expenditure)

\$ 231 \$ 1,225 Advance Signal System / Positive Train Control (PTC) Electrification and Electric Multiple Units (EMUs)

Total

The funding strategy leverages \$600 million in Proposition 1A funding through commitments of regional, local, and federal formula funding

Establishes full funding plan for Electrification, a Resolution 3434 project and high performer in the Plan Bay Area evaluation



"The Governor has told us he wants a plan that will get high-speed rail trains on the track sooner and in a less costly manner than previous plans called for. If that can be accomplished by electrifying Caltrain's lines and using that rightof-way, then it's certainly something we want to consider." — Dan Richard Board Chair, California High-Speed Rail Authority





- Regional Express Lanes Network
  - San Francisco Pricing Program
- Freeway Performance Initiative

#### **Proposed Approach**

- Improve reliability and reduce delay in congested corridors
- Charge drivers a fee to drive in a specific, congested areas and use revenue to fund transportation improvements
  - Maximize efficiency and management of existing freeway, highway and arterial infrastructure, while limiting expansion to only most essential locations
- Benefits exceed costs by a factor of 5:1

# **Related Performance Targets**

- Increase gross regional product
- Reduce per-capita GHG emissions
- Reduce VMT per capita

33%

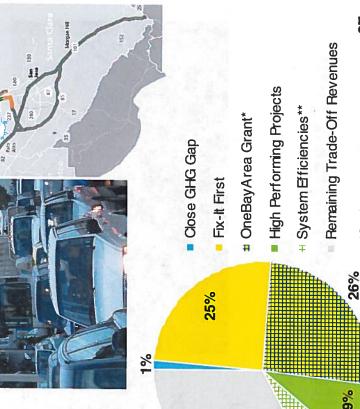
Increase non-auto mode share

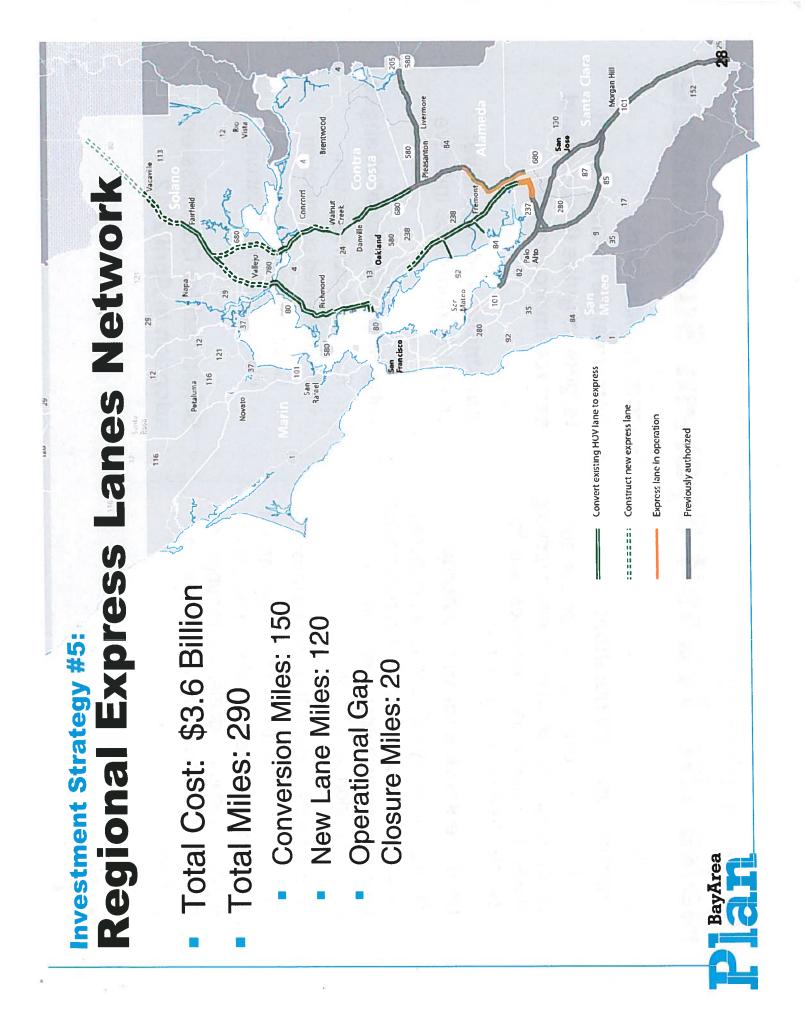
#### Trade-Off Investment Proposal \$3 Billion



21

\*Overlaps with Fix-It First LSR \*\*Overlaps with High Performing Projects





	Sustainable	
× 	sit System	
nvestment Strategy #6:	<b>Make the Tran</b>	
Inve	Ma	

#### **Objectives:**

Improve financial position:

Contain costs, cover a greater percentage of operating and capital costs with a growing share of passenger fare revenues; secure reliable streams of public funding.

Improve service for the customer:

Strengthen the system so that it functions as an accessible, user-friendly and coordinated network for transit riders, regardless of mode, location or jurisdiction.

Attract new riders to the system:

Strengthen the system so that it can attract and accommodate new riders in an era of emission-reduction goals, and is supported through companion land use and pricing policies.

### **Recommendations:**

- Performance measures and targets to guide financial and service improvements
- Investment and incentive: Transit Performance Initiative
- Targeted institutional changes
- Functional consolidation
- Strengthened coordination
- Completion of in-progress institutional consolidations
- Scheduled for Commission adoption in April 2012



amework	Target	5% real reduction in metric over 5 year period and no growth beyond CPI thereafter	Continuous Improvement	Increase ridership levels at or above the rate of population growth in the counties / corridors in which service operates
ainability Framework	Performance Measure / Program	Cost Per Hour or Cost Per Passenger or Cost Per Passenger Mile	Transit Performance Initiative: Investment and Incentive Programs and Regional Customer Satisfaction Survey	Transit Performance Initiative: Investment and Incentive Programs and Regional Customer Satisfaction Survey
Transit Susta	Transit Sustainability Project Goal	Improve Financial Condition	Improve Service for Customer	Attract New Riders to the System





BayArea

3

\*Overlaps with Fix-It First LSR \*\*Overlaps with High Performing Projects

26%

%6

Remaining Trade-Off Revenues

# **County Priorities Reinforce** Investment Strategies

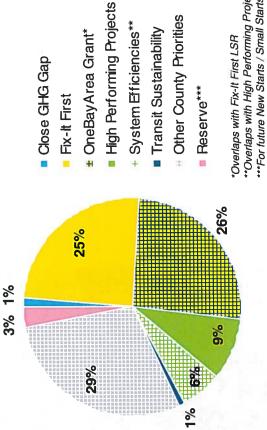
#### submitted by counties -- \$29 Billion Discretionary revenue requests

**OneBayArea Grant and High Performing** County requests overlap with Project investment proposals

#### County Discretionary Revenue Proposal

- Fix-It First = 52%
- Transit, 27%
- Roads and Bridges O&M, 25%
- Expansion = 34%
- Transit, 17%
- Roads and Bridges O&M, 17%
- Bicycle, Pedestrian, and Other<sup>\*</sup> = 14%

\*Complete Streets & System Efficiency elements are also included in the expansion and Fix-lt First categories



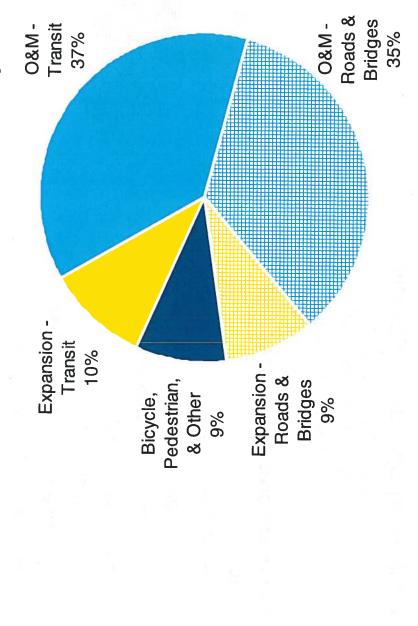
System Efficiencies\*\*

\*Overlaps with High Performing Projects \*\*For future New Starts / Small Starts and High Speed Rail Projects



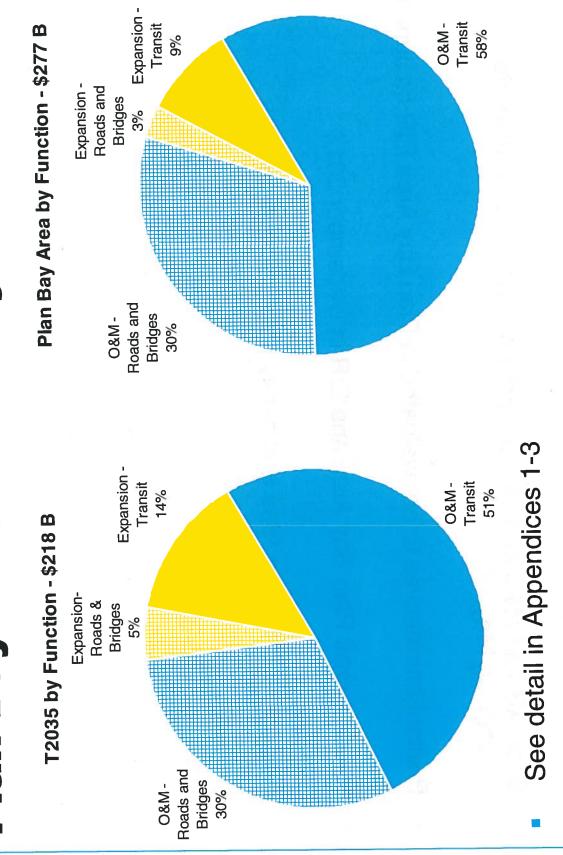
# **Trade-Off Summary**

# Proposed Trade-Off Expenditure by Function



- Proposed Trade-Off Expenditures: \$56 B
- 72% directed to Maintenance & Operations
- 47% directed to Public Transit





Plan Bay Area Summary

34

BayArea

eps
S
ext
Z

- Seek ABAG / MTC approval on preferred land use / transportation strategy on May 17
- Present alternatives to be evaluated in Plan Bay Area EIR on June 8
- Release draft Plan Bay Area and EIR in December 2012
- Adopt final Plan Bay Area and certify final EIR in April 2013

**TRANSPORTATION 2030 PLAN** 

#### FINAL ENVIRONMENTAL IMPACT REPORT

STATE CLEARINGHOUSE NO. 2004022131

Prepared for

#### Metropolitan Transportation Commission

by

DYETT & BHATIA Urban and Regional Planners

In association with

Environmental Science Associates • Environmental Consultants Donaldson Associates • Environmental and Planning Consultants

February 2005

• Partner with local communities in developing transportation approaches that enhance community vitality for neighborhoods and retail centers.

#### Clean Air

- Achieve additional reductions in motor vehicle emissions through effective transportation control measures;
- Working with the Air District, develop new episodic control strategies for predicted high ozone days; and
- Help reduce particulate matter from buses and other heavy duty vehicles.

#### Efficient Freight Travel

- Identify key improvements in the surface transportation system where public investment can help the freight industry;
- Identify long term capacity issues associated with cargo movement through airports and seaports; and
- Collaborate with the private sector to best leverage both public and private financial resources to improve freight related infrastructure.

In addition, the MTC approved a five-point transportation/land use platform to further coordinate transportation and land use planning within the Bay Area and with neighboring regions. The components of the Transportation 2030 Plan are designed to fully achieve the project objectives. The Plan is divided into the financially constrained element and vision element. With this comprehensive set of projects, the Plan meets the project objectives better than any of the other alternatives.

#### ALTERNATIVES

The Transportation 2030 Plan EIR considers four alternatives to the proposed Transportation 2030 Plan in addition to the CEQA-required analysis of a No Project alternative. A full description of the five alternatives is in Chapter 3.1 of the DEIR. The alternatives are as follows:

- No Project Alternative (Alternative 1) The No Project alternative addresses the effects of <u>not</u> implementing the Transportation 2030 Plan. This alternative includes a set of highway, transit, local roadway, bicycle, and pedestrian projects that are in advanced planning stages and slated to go forward since they already have full funding commitments. These projects are: (1) included in the federally required Transportation Improvement Program (TIP), a funding program for the next three years of project and programs in the Bay Area; (2) not yet in the TIP but are fully funded county transportation sales projects authorized by voters in Alameda, Contra Costa, Santa Clara, San Mateo, and San Francisco counties; and (3) not yet in the TIP but fully funded through the Regional Measure 2 Toll Bridge Program that was approved by Bay Area voters in March 2003. These projects are collectively referred to as "Committed Projects."
- Financially Constrained Transportation 2030 Plan Alternative (Alternative 2) This alternative consists of only the set of transportation projects and programs that would be funded through revenues projected to be reasonably available over the 25-year horizon of the Transportation 2030 Plan. This set of projects is known as the

financially constrained element of the Plan. It does not include projects identified in the vision element of the proposed Transportation 2030 Plan. The key financial assumption governing the financially constrained element of the Plan is that existing sources of federal, state, or regional revenues are assumed to continue to 2030 with the exception of county transportation sales tax measures which, by law, must sunset. No new revenue sources that would require voter or legislative approval are assumed. Both "Committed" and "New Commitment" projects are included in this alternative.

- Financially Constrained Transportation 2030 Plan <u>Plus</u> Sales Tax Plan Alternative (Alternative 3) This alternative includes the financially constrained element of the proposed Transportation 2030 Plan <u>plus</u> additional transportation projects and programs identified in potential new or reauthorized county transportation sales tax measures proposed for San Mateo, Contra Costa, Marin, Solano and Sonoma counties (these projects are currently part of the vision element of the Proposed Project). These additional transportation projects have been defined through the respective county planning and public involvement processes.
- Financially Constrained Transportation 2030 Plan Plus High-Occupancy/Toll (HOT) Network Alternative (Alternative 4) This alternative represents the financially constrained element plus the creation of a network of HOT lanes in the region (these projects are also currently part of the vision element of the Proposed Project). In this alternative, the Bay Area's existing High-Occupancy-Vehicle (HOV) lane system of 300 freeway lane miles, which saves time for vehicles with two or more occupants, would be converted to HOT lanes. Carpools, vanpools, and transit vehicles would continue to have free passage in the HOT lanes, but other motorists would pay a fee to use them. The HOT lanes would operate with no tolls for persons in vehicles of three or more. The HOT network would consist of 800 miles of HOT lanes on the Bay Area's freeways, an additional 500 freeway lane miles over existing conditions (2000).
- TRANSDEF Smart Growth Alternative (Alternative 5) This alternative is supplied by TRANSDEF, a transportation advocacy organization, according to the Settlement Agreement and Release entered into by TRANSDEF, Communities for a Better Environment (CBE), Bay Area Air Quality Management District, and MTC in March 2004. Its purpose is to test the effectiveness of a planning strategy of accommodating regional growth by limiting roadway capacity and directing more potential growth into infill and transit-supportive areas, avoiding greenfield development, and implementing pricing strategies to make driving more expensive and transit more attractive. Therefore, this alternative includes a different mix of projects and programs, as well as a different set of land use distribution and pricing assumptions, relative to the Proposed Project and other alternatives.

## FINDINGS OF ALTERNATIVES ANALYSIS

Although the EIR identified first the No Project and secondly the TRANSDEF Smart Growth Alternative as the environmentally superior alternative, the analysis was based on giving an equal weight in all impact areas. MTC finds that these two alternatives are not acceptable for the following reasons. MTC finds that the No Project alternative would not be desirable, in particular on the issue of transportation, nor would it meet the identified goals and objectives nearly as well as the Proposed Project. The No Project alternative would not include the full range of transportation improvement projects identified in the proposed project. Furthermore, it is the least environmentally preferred in the issue area of transportation, failing to provide the key benefits that would be achieved by the Proposed Project.

MTC finds that the TRANSDEF Smart Growth alternative would not be desirable, in particular on the issue of transportation, nor would it meet the identified goals and objectives as well as the Proposed Project. The TRANSDEF alternative would not include the full range of transportation improvement projects identified in the Proposed Project. Furthermore, it is not environmentally preferred in the issue areas of transportation, geology, and long term land use issues. It would fail to provide the full transportation benefits that would be achieved by the Proposed Project. The TRANSDEF Smart Growth Alternative is not selected for implementation over the Transportation 2030 Plan for these reasons:

- The Transportation 2030 Plan would result in the shortest average travel time per trip, compared to all alternatives. The TRANSDEF alternative would have the highest average personal trip time among all the alternatives.
- The TRANSDEF alternative would have more daily vehicle hours of delay (24 percent more compared to the proposed project), which is a key indicator of how the transportation system is performing for auto users (approximately 80 percent or more of the trips made in the Bay Area in 2030 would be by auto).
- The Transportation 2030 Plan would have fewer vehicle miles traveled (VMT) at LOS F compared to the TRANSDEF alternative (about 12 percent difference).
- A substantial number of approved and funded projects are excluded from the TRANSDEF alternative so that funding can be shifted to other (mostly transit) projects; however, some of these funding re-allocations would require voter approval or rejection of prior voter mandates.
- TRANSDEF presumes that regional agencies have certain authority and powers to impose new pricing strategies, but these concepts have not been tested in a legislative or legal framework. Some pricing strategies such as parking cash-out are expressly limited in application by state law.
- Since several key elements of the TRANSDEF Smart Growth Alternative are not readily available, pursuing this alternative could delay other transportation projects that have been developed through a public involvement process, can be funded, and have no technical, legal, or economic impediments.
- The TRANSDEF Smart Growth alternative would have a higher potential for long-term community disruption, as it calls for increasing the housing and population densities of the region's densest communities, in many cases to levels that are significantly higher than anticipated in the current General Plans and ABAG's *Projections 2003*.
- The Transportation 2030 Plan is environmentally superior to the TRANSDEF Smart Growth alternative and all other alternatives in regards to seismic safety risks. The Plan would actually improve seismic safety.

# INDEPENDENT REVIEW AND ANALYSIS

Under CEQA, the lead agency must: (1) independently review and analyze the EIR; (2) circulate draft documents that reflect its independent judgment; and (3) as part of the certification of an EIR, find that the report or declaration reflects the independent judgment of the lead agency. (Pub. Resources Code, section 21082.1, subd. (c).)

The Commission hereby finds that it has independently reviewed and analyzed the Final EIR; circulated the Draft EIR that reflects independent judgment; and finds that the Draft and Final EIR reflect MTC's independent judgment.

# **Appendix B:**

Statement of Overriding Considerations



/

# Appendix B: Statement of Overriding Considerations

CEQA requires the Metropolitan Transportation Commission (MTC) to balance the benefits of the Transportation 2030 Plan against its significant unavoidable environmental effects in determining whether to approve the project. Since the EIR identifies significant impacts of the Transportation 2030 Plan that cannot feasibly be mitigated to below a level of significance, MTC must state in writing its specific reasons for approving the project in a "statement of overriding considerations" pursuant to sections 15043 and 15093 of the CEQA Guidelines. This Statement of Overriding Considerations sets forth the specific reasons supporting MTC's action in approving the Transportation 2030 Plan, based on this EIR and other information in the record of proceedings.

In making the statement of overriding considerations, "CEQA requires the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits of a proposed project against its unavoidable environmental risks when determining whether to approve the project. If the specific economic, legal, social, technological, or other benefits of a proposed project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered 'acceptable'." (CEQA Guidelines, Section 15093(a)) This statement focuses on the larger, more general reasons for approving the project.

MTC has examined a reasonable range of alternatives to the Transportation 2030 Plan. This analysis is fully documented in the EIR on the Transportation 2030 Plan. Based on this examination, MTC has determined that (1) there are numerous tradeoffs in impacts associated with the various alternatives, (2) the alternatives would result in varying degrees of achieving the Transportation 2030 Plan goals, (3) the Transportation 2030 Plan is environmentally preferred in the transportation issue area, (4) the No Project alternative is the environmentally superior alternative becomes the environmentally superior alternative if all impact areas are given equal weight; however, there are significant reservations about the feasibility of this alternative and therefore its ability to meet the project objectives.

CEQA does not require lead agencies to analyze "beneficial impacts" in an EIR. Rather, EIRs focus on potential "significant effects on the environment" defined to be "adverse." (Pub. Resources Code, § 21068.) Nevertheless, decision makers may be aided by information about project benefits. These benefits can be cited, if necessary, in a statement of overriding considerations (CEQA Guidelines, § 15093).

In addition to transportation benefits, other legal, social, and feasibility issues were factored into the decision process. Also, as discussed in the EIR, policy makers factored in the relative importance of the various environmental issue areas in making their final decision.

## TRANSPORTATION 2030 PLAN GOALS AND OBJECTIVES

The goals and objectives for the Transportation 2030 Plan were developed in direct response to public comment. At the June 2003 Transportation Summit, the goals for the 2001 Regional Transportation Plan were criticized as being too broad to provide meaningful direction for a long-range regional transportation plan. In addition, there was an overwhelming call for more measurable objectives in the plan that would allow MTC to chart progress towards the goals. In September 2003, MTC and its public agency partners proposed nine more specific goals for the Transportation 2030 Plan. These goals and objectives were tested with the public through numerous workshops and focus groups. In December 2003, the Commission adopted a final set of goals for the Transportation 2030 Plan.

The Transportation 2030 Plan is intended to guide future transportation improvements for the Bay Area in the context of six policy goals set by the Commission:

- A safe and well maintained system
- A reliable commute
- Access to mobility
- Livable communities
- Clean air
- Efficient freight travel

The objectives for each of these goals are identified in the Transportation 2030 Plan. In addition, the MTC approved a five-point transportation/land use policy platform to further coordinate transportation and land use planning within the Bay Area and with neighboring regions.

The components of the Transportation 2030 Plan are designed to fully achieve the project objectives. The Plan includes a financially constrained subset of projects (Financially Constrained Element) in full compliance with federal planning regulations, that is, it identifies projects that can be delivered with revenues that are deemed to be reasonably available over the planning period. In addition, as permitted by federal, state and MTC statutes, the Plan also includes illustrative transportation projects that would have benefits if additional revenues were secured in the future (Vision Element). Projects within the Vision Element would be funded by specific revenue sources identified in the Plan that would have a reasonable chance of being approved over the next 25 years (including new or reauthorized county transportation sales taxes, higher gas taxes, higher vehicle registration fees, a High Speed Rail Bond, revenues from a system of High-Occupancy Toll (HOT) lanes, and so forth). With this set of projects, the Plan meets the project objectives better than any of the other alternatives.

# ENVIRONMENTAL IMPACT ANALYSIS AND PROJECT BENEFITS

This EIR examined the environmental impacts of the Transportation 2030 Plan in the areas of Transportation, Air Quality, Energy, Geology and Seismicity, Biological Resources, Water

## Appendix B: Statement of Overriding Considerations

Resources, Visual Resources, Noise, Cultural Resources, Land Use, Housing, and Social Environment, and Growth Inducement. MTC has identified significant environmental impacts that cannot be mitigated as shown in Draft EIR Table S-1.

These potentially significant unavoidable impacts include:

- Conversion of important farmland, although the exact quantity cannot be determined until individual transportation project plans are defined;
- Disruption or displacement of existing land uses, neighborhoods, and communities;
- Cumulative land use change effects;
- Potential cumulative air quality impacts for small particulate matter
- Consumption of energy;
- Increased cumulative noise levels;
- Potential damage of transportation infrastructure from seismic events;
- Potential impacts on special-status plant and/or wildlife species and cumulative fragmentation of wildlife habitat; and
- Obstruction of views or change in visual character, from new transportation facilities or sound walls.

As described in the Findings (Appendix A of the Final EIR), many of these impacts will be substantially reduced through implementation of mitigation measures identified in the EIR. In other cases, the EIR states that impacts may be reduced to levels that are not significant, but the impact is still classified as "significant" because the effectiveness of mitigation cannot be determined at this time due to the preliminary nature of the individual project designs.

This EIR also examined five alternatives, including different mixes of transportation projects, land use assumptions, and transportation pricing assumptions:

- No Project Alternative (CEQA mandated alternative)
- Financially Constrained Transportation 2030 Plan Alternative
- Financially Constrained Transportation 2030 Plan Plus Sales Tax Alternative
- Financially Constrained Transportation 2030 Plan Plus High-Occupancy Toll (HOT) Network Alternative
- TRANSDEF Smart Growth Alternative

While the TRANSDEF Smart Growth Alternative was found to have the least environmental impact (other than the No Project alternative), it and all of the other alternatives have significant impacts in one or more issue areas that cannot be mitigated. The EIR finding of the environmentally superior alternative was based on equal weighting of each environmental issue area. A comparison of the Transportation 2030 Plan and the alternatives reveals the following offsetting environmental factors of the Transportation 2030 Plan:

- The Transportation 2030 Plan is environmentally superior in the transportation issue area. It provides the most benefits to transportation. The No Project Alternative, which results in the least amount of overall adverse environmental impacts, performs the worst in the transportation issue area. The second environmentally preferred alternative, TRANSDEF Smart Growth alternative, is less favorable than the Transportation 2030 Plan with regard to transportation impacts.
- All alternatives demonstrate reduced air quality impacts for ROG, NOx, and CO  $\not$ compared to existing conditions and the No Project alternative due to stringent emission controls on automobile engines. The Transportation 2030 Plan performs better than all alternatives in reducing the rate of increase in small particulate matter, except for the TRANSDEF Smart Growth alternative, which assumes untested strategies to re-orient future development to provide intensified growth in certain areas and implement new pricing measures for vehicle and transit users.
- The Plan is environmentally superior to all other alternatives in regards to seismic safety risks. The Plan would actually improve seismic safety relative to the other alternatives.
- All alternatives would consume energy; the Transportation 2030 Plan is highest in energy consumption due to short-term energy needed to construct new facilities and energy needed to support substantially higher transit vehicle use, relative to other alternatives. This energy use is necessary to establish and implement the transportation network that will achieve the best transportation performance.
- The Transportation 2030 Plan includes a number of projects that have been developed through a variety of public processes and actions to approve funding. The TRANSDEF Smart Growth alternative would result in less severe impacts on biological resources, water quality, visual resources, cultural resources, and farmland primarily due to the exclusion of a significant number of new transportation construction projects that have public support and funding approval. Excluding these projects would require voter approval or rejection of prior voter mandates. This is an issue that undermines the feasibility of the TRANSDEF Smart Growth alternative.
- The potential conversion of farmland and disturbances to biological resources and land uses are conservative estimates. The EIR land use and biological resources analysis took a "worst case" approach (Draft EIR, page 2.3-27 and 2.8-13), meaning that it assumed that resource land would be converted to transportation uses and that land uses within a substantial swath along proposed transportation projects may be impacted. In doing so, the severity of the potential impacts may be overstated or "inflated." As stated on page 2.8-13, regarding biological impacts, " ...while such impacts may be identified in this EIR, upon project implementation it is anticipated that actual impacts will be incrementally smaller. Laws and regulations protecting special-status species, areas of ecological significance, and wetland resources are effective incentives for project proponents to design alternatives that either avoid or substantially reduce impacts on these resources." Due to the programmatic level of analysis in the EIR and lack of project-specific plans, it is not possible to define the exact extent of potential impact, so it is not possible to ascertain with certainty whether the identified mitigation measures for these impacts will

reduce impacts to levels considered "not significant." However, it is likely that, with proper design and planning, many of the identified impacts can be avoided or minimized.

• Numerous impacts of the Transportation 2030 Plan would be short-term effects related to construction of new transportation facilities. These impacts, for the most part, can be mitigated to levels that are not significant. The differences in impacts, once mitigated, between the Transportation 2030 Plan and alternatives are not substantial.

Specifically, the Transportation 2030 Plan would provide the following transportation advantages over the other alternatives, as discussed in the EIR:

- The Transportation 2030 Plan would result in shorter average travel times per trip for all trips (work, non-work, and truck trips) except for non-work trips under the Financially Constrained Plus Sales Tax alternative and truck trips under the TRANSDEF Smart Growth alternative.
- The Transportation 2030 Plan generally increases accessibility to jobs by auto and transit due to the extensive level of transportation improvements. All alternatives perform less well compared to the Plan except for the TRANSDEF Smart Growth alternative due to the approach taken by TRANSDEF to redistribute regional growth and further intensify new development beyond Projections 2003, ABAG's adopted growth projections. This is an issue that undermines the feasibility of the TRANSDEF Smart Growth alternative.
- The Transportation 2030 Plan would result in the least daily vehicle hours of delay of all the alternatives (other alternatives produce 8 percent to 49 percent more delay).
- The Transportation 2030 Plan would result in the least number of daily vehicle trips except for the TRANSDEF Smart Growth alternative. This is because the TRANSDEF alternative redistributed regional growth, included strategies that increase the cost of auto use relative to transit, and focused on funding transit expansion projects over further roadway expansion, thus reducing vehicle trips.
- The Transportation 2030 Plan would result in the least amount of congestion, measured in Vehicle Miles of Travel (VMT) at Level of Service (LOS) F, when combining all roadway facilities types (other alternatives generate 12 percent to 24 percent more total VMT at LOS F).

# FEASIBILITY OF TRANSDEF SMART GROWTH ALTERNATIVE

MTC and other agencies have identified specific concerns with the overall feasibility of the TRANSDEF Smart Growth alternative. As described on page 3.1-4 of the Draft EIR, analysis of the TRANSDEF Smart Growth alternative was included in the EIR as part of a settlement agreement between MTC, TRANSDEF, and Communities for a Better Environment and the Bay Area Air Quality Management District in March 2004. Appendix D.1 of the Draft EIR explains the assumptions of the TRANSDEF Smart Growth Alternative, and notes that local governments have not reviewed the land use assumptions, which differ from ABAG's adopted land use assumptions in Projections 2003. Draft EIR Appendix D.2 includes a detailed comparison of the differences between Projections 2003 and the TRANSDEF Smart Growth Alternative land use assumptions.

Specific feasibility issues addressed in the Draft EIR relate to land use authority, elimination of projects from the Plan that already have full funding via voter approved revenues and other sources, and the implementation of untested pricing strategies (pages 3.1-37 and 38). Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, and jurisdictional boundaries. Specific feasibility issues are discussed below.

- 1. The Transportation 2030 Plan is preferred to the TRANSDEF Smart Growth alternative because the performance of the TRANSDEF Smart Growth alternative is predicated on land use assumptions that can not be realized without substantial governmental intervention, through regulation or new incentives to create public funding for housing and infrastructure improvements and increased levels of public services and facilities which would be needed by the proposed intensification of residential development in the urban core. The superior performance of the TRANSDEF Smart Growth Alternative in reducing vehicle trips and in providing improved accessibility to jobs is likely due in part to the assumed redistribution of regional growth. Unresolved conflicts with local General Plans, community character and local economic development objectives also would affect implementation of the land use assumptions. Comments from the county Congestion Management Agencies (CMAs) and other public agencies confirm this concern regarding the feasibility of the TRANSDEF land use assumptions. To the extent that both ABAG's Projections 2003 and TRANSDEF's land use scenario assume some changes to local general plans through incentives or other approaches, the TRANSDEF alternative land use assumptions clearly involve more dramatic changes for some areas as shown in Appendix D.2 of the Draft EIR. For example, by assuming a dramatically larger population in the urban core of San Francisco (substantially beyond the City's Housing Element projections), some regional transportation impacts were minimized. Table 3.1-14 in the Draft EIR summarizes the differences in land use assumptions.
- 2. A significant number of approved and funded transportation projects are excluded from the TRANSDEF Smart Growth alternative so funding can be shifted to other projects (largely from road to transit projects); however, some of these funding re-allocations would require voter approval or rejection of prior voter mandates. Comments on the Draft EIR from the CMAs and other public agencies confirm this problem.
- 3. The exclusion of these projects and programs would be in conflict with countywide transportation plans as noted by the CMAs. Specifically, the state regional transportation plan guidelines state that the RTP should "identify and incorporate other State and local transportation plans and programs." Moreover, this alternative assumes that regional funding commitments to specific projects established through years of planning and public involvement can be overturned and that the public will accept a new set of transportation priorities. A number of these proposals would need to be implemented jurisdiction by jurisdiction and could require voter-approval.
- 4. The viability of various proposed new revenue sources is not known. The ability to implement the transit service improvements in the TRANSDEF alternative depends on freeing up funds that would be used to construct new transportation improvements, and instead using some of

these funds to pay for the daily operation of an expanded transit system. This approach would require legal review to determine the feasibility of using various funding sources for purposes not specifically spelled out in the legislation or voter approval of these funding sources. Thus, operating the transit services proposed by TRANSDEF could be constrained by this approach.

5. The ability to implement certain transportation pricing strategies assumed in the TRANSDEF Smart Growth alternative that would affect future auto and transit in the region hinges on several untested approaches to using MTC's authority, creating new incentives that may or may not be effective, and perhaps requiring new legislation. Indeed, some pricing strategies such as parking cash-out are expressly limited in application by state law.

# BALANCING OF TRANSPORTATION BENEFITS

MTC's decision to adopt the Transportation 2030 Plan rather than any of the alternatives is based on the above factors and on balancing the benefits related to transportation needs and policy goals for the Bay Area and the environmental effects, both of the project itself and of the various alternatives considered.

- 1. The transportation investments in the Transportation 2030 Plan best meet the policy goals and objectives established by MTC for a long-range regional transportation plan, as listed above. Specifically, as demonstrated in the EIR, the Transportation 2030 Plan performs best overall of all alternatives in the transportation issue area, considering all of the various impact measures used in the transportation analysis. Therefore, selecting an alternative that is not the best performing alternative overall for transportation would provide less regional transportation benefit and would not achieve objectives as well as the Transportation 2030 Plan.
- 2. The mobility and access improvements in the Transportation 2030 Plan, coupled with the Transportation/Land Use Policy Platform, will contribute to maintaining a healthy regional economy and improving the quality of life through the diversity of projects and programs contained in the Plan.
- 3. The Transportation 2030 Plan is consistent with adopted county transportation plans and priorities, as well as voter approved local sales tax expenditure plans and bridge toll programs. These plans and priorities, in turn, reflect the input and concerns of county congestion management agencies, transit operators, local governments, and members of the public.
- 4. The transportation improvements, goals, and strategies proposed in the Transportation 2030 Plan were derived from an extensive regional public outreach effort lead by MTC, and they reflect broad public support, as documented in the Transportation 2030 Plan and supplemental public outreach reports.
- 5. MTC has determined, through extensive public outreach that the public is interested in more than a financially constrained Plan, and the new content of the Transportation 2030 Plan with its vision element is intended to respond to this public interest. Furthermore, four county transportation sales tax measures and two transit parcel tax measures that were proposed in

the Vision Element of the Draft Transportation 2030 Plan were subsequently approved by the voters in November 2004, thus demonstrating the public's support for carrying out the Vision Element.

- 6. The Transportation 2030 Plan would improve mobility in 2030 as compared with the No Project alternative:
  - The average travel time per trip would be reduced by 2 percent for work trips, 1 percent for non-work trips, and 1 percent for truck trips.
  - The accessibility of households to job opportunities within 15, 30, and 45 minutes by auto and by transit would be improved, ranging from 1 percent to 4 percent for autos and 13 percent to 20 percent for transit users.
  - The number of daily vehicle trips would be reduced in all nine counties.
  - The amount of VMT at LOS F would be reduced by 20 percent for freeways, expressways and arterial facilities.
- 7. The Transportation 2030 Plan would not interfere with the attainment and maintenance of federal and state air quality standards, as follows:
  - Reactive organic gases, nitrogen oxides, and carbon monoxide would decrease substantially compared to today's emissions (ranging from 82 percent to 87 percent less) due largely to the continued long term effects of California's stringent automobile engine emission controls. The Transportation 2030 Plan would reduce emissions of all types of pollutants in 2030 by 1.6 percent to 2.4 percent compared to the No Project conditions.
  - Compared to existing conditions, particulate matter would increase by 34.8 percent for PM10 and by 25.1 percent for PM2.5. This is due to the projected cumulative regional growth in vehicle miles of travel; however the Transportation 2030 Plan would decrease emissions of particulate matter by 1.3 percent for PM10 and by 1.8 percent for PM2.5 compared to the No Project conditions.
- 8. The Transportation 2030 Plan would support mobility between the Bay Area and neighboring regions by improving highway and transit through key interregional gateways, and thus contribute to the economic well being and quality of life for these areas as well as the Bay Area.

## **OVERRIDING CONSIDERATIONS CONCLUSIONS**

For the foregoing reasons, MTC finds that the Transportation 2030 Plan's benefits would outweigh, and therefore override, any adverse environmental impact that could potentially remain after recommended mitigation measures are implemented. Impacts of the Transportation 2030 Plan would be similar to the other alternatives and would be mitigated to the maximum extent feasible. The benefits of improved transportation systems and a feasible set of transportation improvements and funding strategies would offset the residual adverse impacts. Since the overall objectives of the project relate to improving transportation, the MTC believes that it is prudent to select a feasible alternative that performs the best in the issue area of

# Appendix B: Statement of Overriding Considerations

transportation. In making this determination, MTC incorporates by reference the Findings of Fact set forth above, as well as all of the supporting evidence cited therein and in the administrative record.

# **Appendix C:**

Mitigation Monitoring Program

# Appendix C: Mitigation Monitoring Program

This Mitigation Monitoring Program has been prepared for the EIR for the Transportation 2030 Plan in accordance with the State's mitigation monitoring statute, Public Resource Code Section 21081.6, and sections 15091 (d) and 15097 of the California Environmental Quality Act (CEQA). These provisions require public agencies to establish mitigation monitoring or reporting programs for projects where they have identified significant impacts and measures are carried out. The public agency must adopt the monitoring and reporting program when approving a project. The intent of these provisions is to ensure that mitigation measures are fully implemented.

# PURPOSE OF MITIGATION MONITORING PROGRAM

To ensure that mitigation measures established for significant environmental impacts identified through the CEQA process are carried through, the Public Resources Code was amended in 1988 (codified as Section 21081.6) to require a reporting or monitoring program "designed to ensure compliance during project implementation." Every time a Lead Agency—such as the MTC—approves a mitigated negative declaration or an EIR that identifies significant impacts and measures to mitigate them, it must also prepare a mitigation-monitoring program. CEQA Guidelines Section 15097 was added in 1999 to further clarify agency requirements for mitigation monitoring or reporting.

The Transportation 2030 Plan EIR identified significant environmental impacts and measures that would mitigate those impacts. This document outlines a program for the implementation and monitoring of those mitigation measures. The purpose of this program is to document that the mitigation measures will be implemented and that environmental impacts are reduced to the level identified in the Plan EIR.

Because the Transportation 2030 Plan contains projects that would be developed by agencies other than MTC and located within numerous jurisdictions within the region, MTC finds that the implementation of some mitigation measures listed in Appendix A of this document are not within its jurisdiction. These measures can and should be implemented and monitored by agencies responsible for implementing the individual projects contained in the Transportation 2030 Plan. These agencies include both project sponsors—local jurisdictions, transit agencies, county congestion management agencies, county transportation authorities, and Caltrans—as well as agencies responsible for the conservation of natural resources. These latter agencies include the Bay Area Air Quality Management District, the Bay Conservation and Development Commission, the Regional Water Quality Control Board, the U.S. and California Environmental Protection Agencies, the Department of Fish and Game, and the U.S. Army Corps of Engineers. Ultimately, the MTC will ensure compliance with the identified mitigation measures by requiring individual projects to undergo CEQA and NEPA (if applicable) review.

This Mitigation Monitoring Program includes a discussion of agency roles and responsibilities for mitigation measure implementation and monitoring, general monitoring procedures, and timing of mitigation measure implementation. To ensure preliminary compliance with CEQA, this document summarizes the actions to be taken to implement the mitigation measures prescribed for the Plan EIR. These measures are to be implemented to reduce adverse environmental impacts of individual projects on the resource areas of Air Quality, Land Use, Energy, Noise, Geology, Water Resources, Biological Resources, Visual Resources, and Cultural Resources.

## **PROJECT-LEVEL REVIEW**

Many of the projects proposed in the Transportation 2030 Plan have not yet completed CEQA review because they have not yet been programmed or sufficiently defined to have a meaningful CEQA review. Therefore, the analysis contained in the EIR on the Transportation 2030 Plan is at a "program level" which describes the general range of impacts and mitigation measures.

MTC shall require project sponsors to comply with CEQA and NEPA, if applicable, prior to project approval by MTC as noted in mitigation measures listed in Appendix A. The project sponsors are thus responsible for conducting project-level environmental review for Transportation 2030 Plan projects they carry out. Specifically, project sponsors are responsible for the following:

- Conducting project-level CEQA (and NEPA if applicable) analysis where a transportation project would be likely to have a significant impact on the environment;
- Responding to written comments on impacts and mitigation measures from resource agencies and interested groups/individuals;
- Adopting a mitigation monitoring and reporting program for those transportation projects with significant impacts; and
- Forwarding to MTC the recommendations on the EIR or mitigated negative declaration and the mitigation monitoring and reporting program for those CEQA and NEPA documents.

#### **AGENCY ROLES**

MTC, project sponsors, and resource agencies have specific roles in implementing, monitoring and reporting on the mitigation measures identified in the EIR for the Transportation 2030 Plan. One of the basic premises of the Mitigation Monitoring Program is that agencies responsible for carrying out individual projects identified in the Transportation 2030 Plan are also responsible for mitigating their impacts. As project sponsors, these agencies are responsible for complying with CEQA and/or NEPA prior to project approval.

#### MTC

Although MTC is the lead agency for developing and implementing the Transportation 2030 Plan, MTC may not be the lead agency or project sponsor for individual projects identified in

the Plan. Most mitigation measures listed in the Plan EIR are project-level, rather than program-level measures, and must be implemented through the course of specific project design, permitting, and construction. Therefore, the MTC's main role will be as a responsible agency to oversee future project-level CEQA analyses to ensure incorporation of measures identified in the Plan EIR. As the lead agency responsible for the implementation of the Transportation 2030 Plan, MTC's role includes:

- Requiring sponsors of the transportation projects to comply with CEQA and NEPA, if applicable, prior to project approval by MTC.
- Reviewing proposed projects to consider project changes and incorporation of best practices that would reduce environmental impacts;
- As part of comments on EIRs and other CEQA/NEPA documents, recommend as appropriate, that project sponsors and lead agencies incorporate mitigation measures identified in this EIR and other site-specific measures that are developed during the course of individual project environmental analysis.
- Ensuring that individual project sponsors comply with mitigation measures by requiring sponsors to propose an adequate monitoring and reporting program that involves a method of follow-up to ensure continued compliance throughout construction.
- Regularly reviewing and updating the Transportation Plan at least every three years and the Transportation Improvement Program (TIP) every two years. These updates require a transportation air quality conformity finding pursuant to the Federal Clean Air Act.
- Working with regional agencies and other bodies to implement other actions that would minimize the environmental impacts of the Transportation 2030 Plan.

# **PROJECT SPONSORS**

The role of sponsors of the transportation projects is related to their compliance with CEQA and NEPA, if applicable, as discussed above. The entities herein referred to as "Project Sponsors" are the agencies responsible for environmental clearance, design, right-of-way procurement and construction of the project. Project sponsors shall commit to the mitigation measures set forth in this EIR or equivalent project-specific measures identified during individual project environmental analyses. The project sponsor's role in the implementation of the Plan EIR's mitigation measures include:

- Conducting CEQA analysis where a project may cause a significant impact on the environment;
- Ensuring that potential impacts outlined in this EIR are adequately addressed and mitigated;

- Responding to written comments on impacts and mitigation measures from the MTC and others;
- Adopting and enforcing a mitigation monitoring and reporting program for those projects with significant impacts and forwarding this program to the MTC for review.

# **RESOURCE AGENCIES**

Agencies charged with the protection and conservation of natural resources would be involved through comments on project CEQA and NEPA compliance and permit issuance.

# TIMING

Most of the mitigation measures related to specific site design and construction practices and will therefore be required at the time individual projects are in the design phase. Project sponsors will be required to prepare project-specific mitigation monitoring programs, which may necessitate onsite environmental monitors during construction activities. Project sponsors or their agents will be responsible for successfully implementing and enforcing the mitigation measures.

One of the key components of a monitoring program is to determine whether or not mitigation measures are effective in reducing impacts to levels that are not significant. The environmental analysis in the Transportation 2030 Plan EIR contains detailed significance criteria that establish a minimum threshold for successful mitigation. Standards for successful mitigation also are implicit in many mitigation measures that include such requirements as avoiding a specific impact entirely. Project sponsors will be required to compare residual impacts (after mitigation measures are implemented) to the Transportation 2030 Plan EIR (or subsequent site-specific project EIR) significance criteria to determine mitigation measure effectiveness. The MTC may conduct a comprehensive review of measures that are not effectively mitigating impacts at any time it deems appropriate.

**Appendix D:** 

# MTC Resolution 3680 Certifying the EIR on the Transportation 2030 Plan

Date: February 23, 2005 W.I.: 1411 Referred by: POC

# ABSTRACT

# Resolution No. 3680

This resolution certifies the Environmental Impact Report for the Transportation 2030 Plan.

Date: February 23, 2005 W.I.: 1411 Referred by: POC

# Re: <u>Review and Certification of the Environmental Impact Report for the Transportation 2030</u> <u>Plan</u>

# METROPOLITAN TRANSPORTATION COMMISSION RESOLUTION NO. 3680

WHEREAS, the Metropolitan Transportation Commission (MTC) is the regional transportation planning agency for the San Francisco Bay Area pursuant to Government Code Sections 66500 et seq.; and

WHEREAS, MTC staff and its consultants have prepared a program Environmental Impact Report (EIR) for the Transportation 2030 Plan, pursuant to provisions of the California Environmental Quality Act (CEQA); and

WHEREAS, on November 12, 2004 MTC released for public review and comment the Draft EIR for the Transportation 2030 Plan to all interested parties, and, following a 56-day public review period ending January 7, 2005 responded to all comments received and incorporated comments as appropriate into the final EIR; and

WHEREAS, MTC staff and its consultants have prepared findings, facts in support of findings, statement of overriding considerations, and mitigation monitoring program and incorporated them into the final EIR; and

WHEREAS, MTC staff has provided a written response to each public agency that commented on the Draft EIR ten days before certification of the final EIR; and

WHEREAS, MTC has reviewed and considered the information contained in the Draft and Final EIR, including findings/facts in support of findings, statement of overriding considerations, and mitigation monitoring program, prior to approval of the Transportation 2030 Plan; now, therefore, be it MTC Resolution No. 3425 Page 2

<u>RESOLVED</u>, that MTC has reviewed the Draft and Final Environmental Impact Report for the Transportation 2030 Plan, included herein as Attachment A and made a part hereof by reference, and certifies that it has been completed in compliance with CEQA.

# METROPOLITAN TRANSPORTATION COMMISSION

Steve Kinsey, Chair

The above resolution was entered into by the Metropolitan Transportation Commission at a regular meeting of the Commission held in Oakland, California, on February 23, 2005.

Date: February 23, 2005 W.I.: 1411 Referred by: POC

Attachment A Resolution No. 3680 Page 1 of 1

# Environmental Impact Report for the Transportation 2030 Plan

The Draft and Final Environmental Impact Report for the Transportation 2030 Plan documents are on file in the offices of the Metropolitan Transportation Commission, MetroCenter, 101 Eighth Street, Oakland, California 94607.

**Appendix D:** 

# D.I: Detailed Assumptions for TRANSDEF Smart Growth Alternative

D.2: Comparison of ABAG and TRANSDEF Smart Growth Alternative Projections, 2000-2030

# Appendix D.I: TRANSDEF Smart Growth Alternative

This appendix presents detailed information about the alternative supplied by the Transportation Solutions Defense and Education Fund (TRANSDEF), a transportation advocacy organization, as provided for in the Settlement Agreement and Release entered into by TRANSDEF, Citizens for Better Environment (CBE), Bay Area Air Quality Management District, and MTC in March 2004. TRANSDEF has defined an alternative set of land use and transportation planning assumptions aimed at enhancing transit use, biking and walking as preferred transportation modes in the future. This is to be achieved by concentrating new residential development in existing urban areas, implementing pricing strategies to discourage auto use while increasing the attractiveness of transit, biking and walking, and expanding certain aspects of the regional bus and rail transit network in ways TRANSDEF believes would be more cost effective than current proposals.

# LAND USE ASSUMPTIONS

TRANSDEF has developed its own set of land use assumptions for this alternative, which are different than those used in the Proposed Project and the other four EIR alternatives. These land use assumptions have not been reviewed by local governments or by the public and are not the current set of land use projections adopted by ABAG (*Projections 2003*).

The TRANSDEF alternative seeks to redistribute growth in the region within existing cities and within the footprint of existing development. In many existing neighborhoods no new development occurs, so they remain as they are in 2000. The TRANSDEF alternative land use scenario is patterned after the Network of Neighborhoods Alternative of the Regional Agencies Smart Growth Strategies/Regional Livability Footprint Project (called "Smart Growth Project" for short), one of three conceptually different land use alternatives that were initially considered. Development is clustered along transit corridors and at transit nodes. Over the next 25 years, this alternative assumes that the increasing value of land will lead to the densification of arterial corridors all around the region.

To enable the TRANSDEF alternative's demographic assumptions to be comparable with the Proposed Project and the other alternatives evaluated in this EIR, total jobs, employed residents, households and household population are the same as the ABAG *Projections 2003* regional totals. However, TRANSDEF reduces the total residential land use by 58,400 acres, from 651,800 acres in Projections 2003 to 593,400 acres in the TRANSDEF alternative. TRANSDEF reduces the total acres of residential land uses in rural (less than 500 persons square mile), rural/suburban (500 to 1,000 persons per square mile), suburban (1,000 to 10,000 persons per square mile), and urban (10,000 to 20,000 persons per square mile) areas but increases it in the urban core (greater than 20,000 persons per square miles) where generally good transit service is available. In addition, TRANSDEF increased the net residential densities (households per residential land use in square miles) by 9.8 percent, from 3,129 households per square mile in Projections 2003 to 3,437 households per square mile in the TRANSDEF alternative. A main strategy for accommodating new growth is the redevelopment of low-intensity uses along existing arterial streets served by

buses into mixed-use commercial and housing, particularly multi-family, condominiums, and townhomes. A byproduct of this higher density is a reduced need for households to own multiple autos, which is reflected in MTC's auto ownership forecasts for the TRANSDEF alternative.

To become regional policy, these changes would need to be adopted by ABAG as part of a future socio-economic and land use Projection series and would need to be implemented by local jurisdictions through General Plan and zoning revisions. There are no regulatory mechanisms in place to require local jurisdictions to make such changes. TRANSDEF believes that MTC has a role in accomplishing these land use changes by withholding certain federal and state discretionary funds from local jurisdictions that do not make the necessary revisions to their local plans.

## FUNDING ASSUMPTIONS

## **Committed Funds**

Historically, MTC has included all fully funded projects in the financially constrained element of the RTP. This includes projects that are fully funded as a result of legislation or voter action, or are included in MTC's funding priorities for the next three years (i.e., included as part of the 2005 Transportation Improvement Program).

In contrast to MTC's assumptions, TRANSDEF considered the list of committed projects to only include projects currently under construction or projects that are under contract for construction by 2006. Thus, TRANSDEF's set of committed projects is significantly smaller than for the other alternatives. TRANSDEF uses the money assigned to these projects for other projects it has defined.

## New Transportation 2030 Commitments

The financially constrained element of the Transportation 2030 plan includes funding for new projects with revenues expected to be available in the future (these projects were known as "Track 1" in previous regional transportation plans but are now referred to as "New Commitments" in this EIR).

TRANSDEF's set of new committed projects is significantly smaller than those included in the Financially Constrained alternative, which will provide the basis for the Transportation 2030 Plan's conformity analysis.

# County Transportation Sales Tax Expenditure Plans

TRANSDEF also examined the proposed set of projects in various county transportation sales tax expenditure plans in Contra Costa, Marin, Sonoma, Solano, and San Mateo counties that will be voted on in November 2004. TRANSDEF did not consider these projects to be committed, if approved by the voters. To implement the alternative set of projects proposed by TRANSDEF, a new measure would need to be placed on the ballot to revise the approved set of projects at a future date.

# **Projects Evaluated**

The TRANSDEF alternative includes (1) 170 projects out of a total of 242 projects MTC considers committed; (2) 217 projects out of a total of 344 projects that are not fully funded and rely on future transportation revenues (called "Track 1" projects in past RTPs); and (3) 32 projects out of a total of 92 proposed sales tax projects. In summary, TRANSDEF deleted a total of 261 projects from the Proposed Project. A total of 199 projects were excluded from the financially constrained element, and a total of 62 proposed sales tax projects were excluded from the vision element of the Transportation 2030 Plan. Many of the excluded projects are projects approved by the voters as part of a county transportation sales tax measure and Regional Measures 1 and 2, which raised tolls to \$2 dollars and \$3 dollars, respectively, on Bay bridges to fund bridge improvements and related congestion relief improvements within the bridge corridors. See Table D-1.

Projects added by TRANSDEF include:

# **Road Projects:**

- Construct a connector from westbound I-580 and I-238 to southbound onto Route 238, Foothill Boulevard
- Construct an underpass of Mission by Jackson and Foothill at the Route 238, Route 185 and Route 92 intersections just south of downtown Hayward.
- Widen Route 92 bridge to four lanes eastbound over I-880 to handle the afternoon peak weave of cloverleaf traffic

# **Transit Projects:**

- New Bus Rapid Transit (BRT) for Contra Costa
- New Diesel Multiple Unit (DMU) for the East Contra Costa County (Delta corridor) and Vallejo-Napa
- New San Francisco Muni C-Line BRT
- New Bus Rapid Transit for: Vacaville, Fairfield, Benicia-Vallejo, Santa Rosa-Sebastopol, Cotati-Rohnert Park, Petaluma, Novato, Central Marin, Pacifica-South San Francisco, San Mateo-Foster City, Belmont-Redwood City, Menlo Park-Palo Alto, Livermore, Pleasanton, San Ramon, Oakland Airport, and Cal State Hayward
- New High Speed Rail line using Altamont Pass corridor for entry into the Bay Area

## Funding Summary

The budget for the financial constrained element of the proposed Transportation 2030 Plan (Proposed Project) is \$113 billion. The proposed sales tax expenditure plans, which appear in the vision element, have a total value of \$5.7 billion. TRANSDEF excluded 199 Committed and "Track 1" from the financially constrained and 62 proposed sales tax projects from the vision element. This resulted in a surplus of about \$10.4 billion, which would be applied towards the

Transportation 2030 Plan Draft Environmental Impact Report

transit operating and capital costs associated with the new transit service proposed by TRANSDEF. MTC estimates the transit operating and capital costs to be about \$4.2 billion.

# **Transit Transfer Policies**

TRANSDEF sought to eliminate cost as a barrier to riders transferring between transit routes and between transit systems. Instead of charging passengers to transfer using the new universal fare card Translink), TRANSDEF assumes riders do not have to pay to transfer.

# PRICING PROGRAMS

TRANSDEF proposes several new transportation pricing policies will be implemented by the appropriate agency with the requisite authority to encourage a shift in travel from single occupant vehicles to transit, ridesharing, or bike/walking:

- \$2.00/day for parking at several high-demand BART stations (implemented by BART).
- Housing developments provide each resident with a monthly transit pass at a reduced rate similar to VTA's Eco Pass program. Residents pay for the eco pass as part of rent or homeowner association fees (implemented by cities as part of their development approval process).
- All employers offer a transit subsidy of \$5 per day in lieu of free parking, typically known as "parking cash out". (implemented by cities through a local ordinance or other regulation). (Note: this was modeled by MTC as a daily cost for employees to park, since the transfer of income from employers to employees cannot be modeled in MTC's travel demand modeling system).

# **TRANSPORTATION PROJECTS**

The TRANSDEF alternative includes a different mix of regional transportation projects and programs than the Proposed Project or other alternatives. Differences in the TRANSDEF alternative, relative to the Proposed Project, are outlined in the following subsections.

# HIGHWAY PROJECT SELECTION METHODOLOGY

In general, the TRANSDEF alternative does not invest in major roadway capacity increasing projects (meaning projects with a cost over \$5 million, unless they are already under contract for construction or are being paid for by developer mitigation funds). All safety projects included in the Proposed Project are funded. Ramp metering in the region was also assumed.

# TRANSIT PROJECT SELECTION METHODOLOGY

A network of new "Rapid Bus" lines was defined for the region to serve higher density development in corridors along major arterials. Several new light rail services were added to connect various communities. Service on local bus routes is doubled on many lines, and improved passenger amenities, including real time arrival information, are made available for bus passengers throughout the region. These new lines will likely require new sources of operating funds, which would not be available in under the financially constrained element of the Proposed Project. TRANSDEF assumes that certain funds which are currently available for construction of transit and highway projects, but not for transit operations, will in the future be available for operating new transit services proposed by TRANSDEF.

# Rapid Bus

Rapid Bus service is intended to make transit use more attractive by upgrading bus service in heavily traveled arterial corridors. Transit Preferential Streets will speed buses by providing transit priority at traffic signals, queue jumps, optimized bus stops, improved pavement, and exclusive bus lanes where needed. Low floor buses and raised sidewalks may provide one-step or no-step entry and buses will have more doors make loading and unloading faster. Proof-of-payment will also speed up loading of passengers. The Rapid Bus lines would not have park and ride facilities, as they are designed to serve significant activity centers where people are already congregated. Because Rapid Bus is based on limited stop service, underlying local service in many communities would be retained and in some cases improved as well.

In Marin, Golden Gate service would be increased, including 15-minute headways along US 101 between Novato and San Francisco. Rapid Bus lines would run through the cities of Central Marin, and also in Novato. In Sonoma County, Rapid Bus lines would run in Petaluma, Cotati, and Rohnert Park, along with a trunk Rapid Bus service from East Santa Rosa to Sebastopol.

A new Rapid Bus line would connect Mare Island, Vallejo, Benicia, and the Capitol Corridor intercity trains. It would meet the Vallejo-Napa rail service at the relocated ferry terminal at the foot of Lemon Street in Vallejo. Rapid Bus service also would circulate from Capitol Corridor train stations in Fairfield and Vacaville along improved arterials, connecting new infill growth to city centers.

Central Contra Costa County cities would be served by a looping Rapid Bus system, connecting Walnut Creek, Concord, Pleasant Hill and Martinez. All BART stations would be served, along with a major new urban center assumed to be developed on and around the Sun Valley Mall. Smaller community centers are assumed to develop at existing strip malls and along underdeveloped arterials.

In the Tri-Valley area, three new Rapid Bus lines would serve Livermore, Pleasanton, Dublin, and San Ramon. Connections would be made to all BART stations and the new Altamont HSR stations on Isabel Avenue in Livermore and at Vasco Road. All major employment centers would be connected, including Bishop Ranch, Hacienda, and Lawrence Livermore National Labs.

Santa Clara County's existing bus system would be overlaid with a new Rapid Bus network serving the busiest lines. The Great Mall in Milpitas and Eastridge Mall in East San Jose would serve as bookends for a revitalized corridor of homes and businesses.

Like San Jose, San Francisco also would have a new Rapid Bus network overlaid upon its busiest lines. In many places, continuous 24-hour bus lanes would replace existing bus lanes. The Central Subway would be replaced with a new C-Line Rapid Bus, and would combine the three lines that serve Chinatown and North Beach (30, 41, 45). The new C-Line would operate on exclusive lanes from Mission Bay and the Transbay area through SOMA, downtown, and Chinatown to North Beach. From North Beach, the line would loop over Russian Hill into Cow Hollow and back via the Marina and Fishermen's Wharf. Stockton Street in Chinatown.

In the East Bay, several AC Transit Rapid Bus lines would overlay several of the busiest local lines from Fremont north to Albany, including lines on Hesperian, MacArthur and International Boulevards. Headways would be reduced on a number of lines throughout AC Transit's two county service area. A new Rapid Bus line would link Hayward's BART station to California State University, Hayward, supporting development of a mixed-use corridor and boosting Cal State enrollment.

# Rail

The TRANSDEF alternative would not fund any of the currently planned BART extensions to Warm Springs and San Jose/Santa Clara. Modern DMU (Diesel Multiple Unit) service using self propelled cars on conventional rail tracks were selected for certain corridors designated by TRANSDEF for significant growth.

Caltrain was electrified and frequency of service increased to BART levels throughout the day. Caltrain service between San Jose and the Transbay Terminal would include a mix of local trains running every 15 minutes and "Baby Bullets" express trains, running every 30 minutes. San Jose, Redwood City, Millbrae, and the Transbay Terminal in San Francisco also would serve proposed High Speed Rail (HSR) trains (funding for the initial segment would be voted on in a statewide election in 2006).

In the North Bay, the SMART train (which would also use DMU equipment) would link Sonoma and Marin Counties, running from a new ferry terminal at San Quentin to Cloverdale. SMART would replace all trunkline Golden Gate Transit service in Sonoma County.

The Route 29 rail corridor between Vallejo and North Napa would be improved with DMUs on the existing rail line. Trains would start at a relocated Vallejo ferry terminal and serve the communities between Vallejo and Napa. They would go to a terminal on the north side of Napa. The Vallejo-Napa DMUs would connect to the ferry to San Francisco, to deliver tourists to the Napa Valley, where private coaches would circulate between wineries, hotels, and DMU stops.

The Delta cities of Contra Costa County would be tied into the region with a new DMU rail system running between North Concord BART and Brentwood. Development in the eastern part of the county would be focused around this line.

## Facilities for Pedestrians, Bicyclists and Persons with Disabilities

The TRANSDEF alternative funds projects that would provide accessible paths of travel for new transit lines and improve paths of travel to existing transit. Making fixed route transit service more accessible for persons with disabilities would limit cost increases associated with providing

complementary ADA paratransit service. Such public works improvements also would enhance the walkability of many neighborhood environs.

# High Speed Rail

To move people long distances across the region, the TRANSDEF alternative relies on a few key projects and a redeployment of existing services. The TRANSDEF alternative assumes that a statewide High Speed Rail (HSR) system will be operational within the next 25 years and will enter the Bay Area using the I-580 Altamont Corridor between the San Joaquin Valley. It would replace the existing Altamont Commuter Express trains, tie into BART (via very short extensions) in west Livermore and Fremont, and connect Fremont and San Jose.

# Ferries

The Water Transit Authority's proposed ferry routes, which are part of the Proposed Project, would not be included in this alternative, with the exception of new ferry service from San Quentin to the Ferry Building (this would operate on 30-minute headways). Other existing services would remain in place.

Table D-I: Transportation 2030 Plan Projects Excluded from TRANSDEF Smart Growth Alternative

	Sales Tax Project, 2= Regional Measure   Project, 3= Regional Measure 2 Project	1	2	2
Project ID	Project/Program	1	2	3
	ed Projects (Financially Constrained Element)			
Bay Area F 22001			1	11
	SMART Commuter Rail project (environmental, preliminary engineering, and right-of- way) (Resolution 3434)			
22003	Capitol Corridor: Phase 2 enhancements –(Resolution 3434)			1
22006	Downtown Ferry Terminal improvements and spare ferry vessels (Resolution 3434)			1
22009	Capitol Corridor intercity rail service (track capacity/frequency improvements from Oakland to San Jose designed to allow 16 daily round trips between Oakland and Sacramento/San Jose) (Resolution 3434)			
22241	Regional Measure 2 Studies (includes regional rail study, transit connectivity study, Water Transit Authority (WTA) environmental studies, I-680/Pleasant Hill BART connector study, and Caldecott Tunnel transit ridership study)			1
22242	Real-Time Transit Grant Program			1
22243	Regional Measure 2 Express Bus North Improvements (includes park and ride lots and rolling stock)			1
22244	City Carshare			1
22245	Safe Routes to Transit			1
94514	1-880/Route 92 interchange improvements	$\checkmark$	1	
Alameda				
21100	I-580/Vasco Road interchange improvements		1	1
21114	Washington/Paseo Padre Parkway Grade Separation	$\checkmark$	-	1
21125	Route 84 westbound HOV lane extension from Newark Boulevard to I-880.			1
21126	Route 84 westbound HOV on-ramp from Newark Boulevard			1
21417	Dumbarton Express park-and-ride: 90 spaces on Decoto Road near I-880 by the Dumbarton Bridge (includes right-of-way acquisition)			
21472	I-680/Bernal Avenue interchange improvements			-
21473	Construct a 4-lane major arterial connecting Dublin Boulevard and North Canyons Parkway			
21475	I-580/First Street interchange improvements			
21477	I-580/Greenville Road interchange improvements			
21489	I-580/San Ramon Road/Foothill Road interchange improvements			
21492	Extend Scarlett Drive from Dublin Boulevard to Dougherty Road	1		
21896	Route 84 vertical and horizontal alignment improvements in Fremont (from 3 miles east of I-680 to 5.1 miles east of I-680)			
22240	Regional Measure 2 Express Bus South Improvements (includes park-and-ride lots, HOV access improvements, and rolling stock)			1
22469	East Dublin BART Station transit village			
22785	Construct I-580 eastbound auxiliary lane from First Street to Vasco Road			
22796	Construct 4-lane arterial connection between future eastern end of Dublin Boulevard in Dublin to North Canyons Parkway in Livermore			
22991	Widen I-680 for southbound High Occupancy Vehicle/High Occupancy Toll (HOV/HOT) lane from Route 237 to Route 84 (includes ramp metering and auxiliary lanes)	1		
94024	Auto/truck separation lane at I-580/I-205 interchange			-

 Table D-I: Transportation 2030 Plan Projects Excluded from TRANSDEF Smart Growth Alternative

 L= Abbraved Sales Tax Project
 2= Regional Measure 1 Project

	Sales Tax Project, 2= Regional Measure 1 Project, 3= Regional Measure 2 Project.	····		- 1	
Project ID	Project/Program	1	2	3	
94030	Reconstruct I-880/Route 262 interchange and widen I-880 from Route 262 (Mission Boulevard) to the Santa Clara County line from 8 lanes to 10 lanes (8 mixed-flow and 2 HOV lanes)	1			
94506	Widen Route 84 to 6-lane parkway from I-880 to Paseo Padre and 4-lane parkway from Paseo Padre to Mission Boulevard along the Historic Parkway alignment	~			
Contra Co	sta				
21213	Pittsburg/Bay Point BART Station parking & lighting improvements (400 new spaces)		1		
21216	Extend Laurel Road from Route 4 Bypass to Empire Avenue				
22353	I-680 southbound HOV gap closure between North Main Street and Livorna				
22601	Route 4 Bypass, Segment 3: construct a 2-lane facility from Balfour Road to Walnut Boulevard, and upgrade Marsh Creek Road				
94047	Extend the northern limits of the I-80 westbound HOV lane from north of Cummings Skyway to Route 4				
94051	I-680 auxiliary lane from Diablo Road to Sycamore Valley Road (Segment 1) in Danville and from Crow Canyon Road to Bollinger Canyon Road (Segment 3) in San Ramon	~			
98115	Widen Ygnacio Valley/Kirker Pass Roads from 4 lanes to 6 lanes from Michigan Boulevard to Cowell Road				
98132	Widen and extend Bollinger Canyon Road to 6 lanes from Alcosta Boulevard to Dougherty Road				
98134	Widen Dougherty Road to 6 lanes from Red Willow to Contra Costa County line				
98135	Construct Windermere Parkway: 4 lanes from Bollinger Canyon Road extension to East Branch				
98136	Construct East Branch as 4 lanes from Bollinger Canyon Road extension to Camino Tassajara				
98142	Widen Route 4 from 4 lanes to 8 lanes with HOV lanes from Loveridge Road to Somersville Road	~			
98211	I-80 eastbound HOV lane extension from Route 4 to the Crockett interchange just south of the Carquinez Bridge			1	
98221	Route 4 Bypass, Segment 2, Phase2: widen to 4 lanes from Lone Tree Way to Balfour Road				
Marin					
21325	US 101/Greenbrae interchange improvements			1	
San Franci					
22982	Transit enhancements program	~			
San Mateo					
21605	US 101/Oyster Point Boulevard interchange improvements (Phases 2 and 3)	~			
21606	US 101/ Willow Road interchange reconstruction	1			
21608	US 101 northbound and southbound auxiliary lanes from Marsh Road to Santa Clara County line	~			
98176	US 101 auxiliary lanes from 3rd Avenue to Millbrae and US 101/Peninsula Avenue interchange reconstruction	~			

 Table D-I: Transportation 2030 Plan Projects Excluded from TRANSDEF Smart Growth Alternative

 I= Abbraved Sales Tax Project. 2= Regional Measure 1 Project. 3= Regional Measure 2 Project.

I = Approved S	ales Tax Project, 2= Regional Measure 1 Project, 3= Regional Measure 2 Project			
Project ID	Project/Program	1	2	3
Santa Clara				
21558	Foothill Expressway traffic and signal operational improvements from Edith Avenue to El Monte Avenue, and at Grant Avenue/St. Joseph Avenue intersection			
21727	Route 87/US 101 ramp connection to Trimble Road interchange			
21785	US 101/Blossom Hill Road interchange improvements		-	
21786	US 101/Hellyer Avenue interchange modifications			-
21832	Central Expressway level-of-service improvements from Bowers Avenue to De la Cruz Boulevard	~		
21837	Capitol Expressway level-of-service improvements at McLaughlin Avenue	✓		
21921	BART extension into Santa Clara County (Resolution 3434)	$\checkmark$		
21922	San Jose International Airport connections to Guadalupe Light Rail Transit (LRT)	$\checkmark$		
22014	Downtown East Valley: Santa Clara/Alum Rock and Capitol Expressway to Nieman: Preliminary Engineering and Right of way purchase (Resolution 3434)	~		
22822	Expressway traffic information outlets		1	
22902	Future rail corridors to be determined by Major Investment Studies (MIS)	$\checkmark$		
Solano				
21341	Project development for new Fairfield/Vacaville multi-modal rail station for Capitol Corridor intercity rail service in Solano County (Phase 1)			1
22629	New Vallejo Ferry Terminal intermodal facility			1
22631	Route 12 westbound (Red Top Road) truck lane			
22632	American Canyon Road overpass at 1-80			
22899	Widen Route 12 between Suisun City and Rio Vista from 2 lanes to 4 lanes (includes study of new Rio Vista Bridge)			
22985	Benicia Intermodal Transportation Station			1
22986	Widen and improve Broadway between Route 37 and Mini Drive from 2 lanes to 4 lanes			
Sonoma				
21070	Realign Route 116 (Stage Gulch Road) along Champlin Creek and widen remaining segments to accommodate pedestrians and bicyclists			
22490	Convert bridges of Sonoma County from one-lane to two-lane bridges			
22655	Widen US 101 for HOV lanes (one in each direction) from Rohnert Park Expressway to Santa Rosa Avenue (includes interchange improvements and ramp metering)			
94165	US 101 northbound and southbound HOV lanes from Route 12 to Steele Lane in Santa Rosa			
New Cor	mmitment (previously called Track I) (Financially Constrained Element)			
Bay Area	Region			
22247	Regional Bicycle and Pedestrian Program		1	1
Alameda			1	
21105	I-580/Isabel interchange improvements (Phases 1 and 2)	~	1	1
21123	Union City Intermodal Station infrastructure improvements (Phase 2)	$\checkmark$		
21131	BART-Oakland International Airport connector –(Resolution 3434)	1		1

#### Table D-I: Transportation 2030 Plan Projects Excluded from TRANSDEF Smart Growth Alternative

I = Approved Sales Tax Project, 2= Regional Measure I Project, 3= Regional Measure 2 Project

Project ID	Project/Program	1	2	3
21132	BART extension to Warm Springs (Resolution 3434)	~		1
21144	I-80/Gilman Avenue interchange improvements (includes roundabouts)			
21149	Upgrade express bus services in Dumbarton corridor			$\checkmark$
22013	I-580 corridor improvements (includes widen I-580 in both directions for HOV and auxiliary lanes from Tassajara Road to Greenville Road, construct HOV direct connector from westbound I-580 to southbound I-680, construct eastbound truck climbing lane from Flynn Road to Greenville Road (Altamont Summit), and acquire express buses) (Resolution 3434)	~		
22042	Widen I-680 for northbound HOV lane from Route 237 to Stoneride Drive (includes ramp metering and auxiliary lanes)	~		
22062	Construct infrastructure for future Irvington BART Station			-
22063	Route 238 corridor improvements between Foothill Boulevard/Mattox Road to Mission Boulevard/Industrial Parkway (includes adding a lane throughout the corridor and grade separations at the Foothill/Mission/Jackson interchange)	~		
22084	Oakland International Airport North Field access road			
22100	Replace I-880/Davis Street overcrossing			
22101	Replace I-880/Marina Boulevard overcrossing			
22509	Alameda/Oakland to San Francisco ferry service and Harbor Bay to San Francisco ferry service	~		1
22511	Berkeley/Albany to San Francisco ferry service –(Resolution 3434)			1
22657	I-205/I-580 Altamont Pass westbound truck lane			-
22760	Outer Harbor intermodal terminal (formerly known as joint Intermodal Terminal (JIT) expansion)			
22761	I-880 from Hegenberger Road to I-980 operation improvements (includes freight movement to Port of Oakland)			
22763	Reconstruct southbound 1-880 on- and off- ramps in conjunction with 1-880/5th Street seismic retrofit			
22764	Construct auxiliary lane on I-880 between Hegenberger Road and 66th Avenue and shift merge point of the westbound Hegenberger Road to I-880 on-ramp			
22766	Fruitvale Avenue Rail Bridge seismic retrofit			
22776	Widen Route 84 from 2 lanes to 4 lanes from north of Pigeon Pass to Vineyard Avenue and 2 lanes to 4 or 6 lanes from Vineyard Avenue to Jack London Boulevard	1		
22779	Route 262/Warren Avenue/I-880 interchange improvements (including Union Pacific Railroad grade separation) (Phase 2)			
22990	Widen Route 262 from I-880 to Warm Springs Boulevard (including reconstructing Route 262/I-880 and Route 262/Kato Road interchanges) and reconstruct Union Pacific Railroad underpasses	1		
98139	ACE station/track improvements in Alameda County (including parking improvements at Vasco Road and downtown Livermore stations)	~		
98208	Soundwalls program			

-

Table D-I: Transportation 2030 Plan Projects Excluded from TRANSDEF Smart Growth Alternative

Project ID	Project/Program	1	2	3
Contra Co	sta.			
21205	I-680/Route 4 interchange freeway-to-freeway direct connectors: eastbound Route 4 to southbound I-680, and northbound I- 680 to westbound Route 4 (Phases I and 2)	~		
21206	Caldecott Tunnel fourth bore			1
21207	Martinez Intermodal Terminal Facility (Phase 3 initial segment): 200 interim parking spaces (includes site acquisition, demolition and construction)			
22602	Construct I-680 auxiliary lanes in both directions from Sycamore Valley Road to Crow Canyon Road	~		i a dele report di ditte
22603	Richmond intermodal transfer station (680 space parking garage)			
98130	Widen Alhambra Avenue from Route 4 to McAlvey Drive from 2 lanes to 4 lanes	1		
98194	Extend Commerce Avenue between Pine Creek and Waterworld Parkway to connect Willow Pass Road with Route 242/Concord Avenue interchange	~		
98196	Route 24 eastbound auxiliary lanes from Gateway Boulevard to Brookwood Road/Moraga Way	1		
98222	Route 4 Bypass, Segment 1: Route 160 freeway-to-freeway connectors to and from the north			
98999	Widen Route 4 eastbound from 4 lanes to 8 lanes from Somersville Road to Route 160	~		
21306	US 101/Lucas Valley Road interchange improvements (initial phase)	~		
Marin				
98154	Widen US 101 from Route 37 to the Sonoma County line from 4 lanes to 6 lanes (including 2 HOV lanes) and convert some highway sections to freeway standards			
98179	US 101/Tiburon Boulevard interchange improvements			
Napa				
94074	Widen Route 12 (Jamieson Canyon) from I-80 in Solano County to Route 29 in Napa County from 2 lanes to 4 lanes (Napa County portion of project)			
94075	Route 12/Route 29/Airport interchange construction			
San Franci				
21510	Third Street light-rail transit extension to Chinatown, Phase 2 (Central Subway)	~		
22416	Traffic calming	1		
22984	Wheelchair curb ramps	~		
San Mateo				
21603	US 101/Woodside Road interchange improvements	1	1	1
21613	Route 92 improvements from San Mateo Bridge to 1-280, includes uphill passing lane from US 101 to 1-280 (Phase 1)	1		
21615	I-280/Route I interchange safety improvements (initial phase)	1		
21618	Dumbarton rail corridor (Phase I) –(Resolution 3434)	√		1
22125	Ferry service from South San Francisco to San Francisco –(Resolution 3434)			~
22223	Study of US 101/Peninsula Avenue southbound ramps	√		
22230	Study of I-280 auxiliary lanes from I-380 to Hickey Boulevard	$\checkmark$		

 Table D-I: Transportation 2030 Plan Projects Excluded from TRANSDEF Smart Growth Alternative

Project ID	Project/Program	1	2	3	
22282	Widen US 101 southbound by adding 5th lane from westbound Route 92 loop on- ramp to Ralston Avenue off-ramp				
22424	BART Advanced Automatic Train Control (AATC) Phase V - Daly City to Millbrae/SFO				
22756	US 101/Candlestick interchange reconstruction (Phase 1)	1			
Santa Clar	a		1	1	
20002	Route 85 noise mitigation between I-280 and Route 87	~	1	1	
21713	Construct auxiliary lane on eastbound Route 237 from North First Street to Zanker Road				
21714	Widen US 101 between Monterey Highway and Route 25 (includes an extension to Santa Teresa Boulevard) and construct a full interchange at US 101/Route 25/Santa Teresa Boulevard				
21716	Widen Route 237 from 4 lanes to 6 lanes for HOV lanes between Route 85 and east of Mathilda Avenue				
21717	Widen Route 25 from US 101 to Route 156 from 2 lanes to 6 lanes (includes new interchange at Route 156)				
21718	Route 85 northbound and southbound auxiliary lanes between Homestead Avenue and Fremont Avenue				
21719	I-880/I-280/Stevens Creek Boulevard interchange improvements (Phase I)				
21720	US 101/Tennant Avenue interchange improvements				
21722	US 101 southbound Trimble Road/De La Cruz Boulevard/Central Expressway interchange improvements		-		
21723	US 101/Tully Road interchange modifications				
21724	Widen US 101 for northbound and southbound auxiliary lane from Trimble Road to Montague Expressway				
21749	Extend Butterfield Boulevard from Tennant Avenue to Watsonville Road				
21836	San Tomas Expressway at Hamilton Avenue level-of-service improvements	~			
22010	Construct I-280 northbound second exit lane to Foothill Expressway				
22012	Route 237 eastbound auxiliary lane improvement from North First Street to Zanker Road				
22015	I-680/I-880 cross connector (environmental and conceptual engineering)	1			
22018	US 101/Mathilda Avenue interchange improvements			_	
22118	Extend Hill Road to Peet Avenue				
22134	Widen US 101 southbound from Story Road to Yerba Buena Road				
22140	Widen US 101 between Cochrane Road and Monterey Highway from 6 lanes to 8 lanes				
22142	US 101/Capitol Expressway interchange improvements (includes new northbound on-ramp from Yerba Buena Road)				
22145	Widen westbound Route 237 on-ramp from Route 237 to northbound US 101 to 2 lanes and add auxiliary lane on northbound US 101 from Route 237 on-ramp to Ellis Street interchange				
22153	Extend Mary Avenue north across Route 237				
22156	Route 85 northbound to SR 237 eastbound connector ramp improvements				

Table D-I: Transportation 2030 Plan Projects Excluded from TRANSDEF Smart Growth Alternative

Project ID	Project/Program		2	3
22162	Route 237 westbound to Route 85 southbound connector ramp improvements	-		
22169	Widen Coleman Avenue from Hedding Street and a future Autumn Street extension from 4 lanes to 6 lanes			
22170	Construct I-880 overcrossing on Charcot Avenue between Paragon Drive and Old Oakland Road as a reliever route to Montague Expressway and Brokaw Road			
22171	Extend Autumn Street from Julian Street to Coleman Avenue to connect I-880 to west part of downtown San Jose			
22175	Widen Almaden Expressway between Coleman Road and Blossom Hill Road to 8 Ianes			
22176	Widen Berryessa Road from I-680 to Commercial Street from 4 lanes to 6 lanes			
22177	Widen Branham Lane from Vista Park Drive to Snell Avenue from 4 lanes to 6 lanes			
22178	Replace 4-lane structure with 6-lane bridge on Calaveras Boulevard over Union Pacific Railroad from Abel Street to Milpitas Boulevard			
22179	Widen Central Expressway between Lawrence Expressway and San Tomas Expressway from 4 lanes to 6 lanes			
22180	Widen Central Expressway between Lawrence Expressway and Mary Avenue to provide auxiliary acceleration and/or deceleration lanes			
22181	Construct 4-lane bridge over Guadalupe River between Almaden Expressway and Fell Avenue to connection sections of Chynoweth Avenue			
22182	Gilman Road/Arroyo Circle traffic signal and intersection improvements			
22186	Widen San Tomas Expressway between Route 82 and Williams Road to 8 lanes			
22422	Widen Senter Road between Tully Road and Capitol Expressway to 6 lanes			
22806	Capitol Avenue/Great Mall Parkway grade separation over Montague Expressway			
22816	Oregon-Page Mill Expressway corridor operational improvements			
22817	Widen Campbell Avenue to accommodate pedestrian and bicycle facilities		<u></u>	
22830	Widen First Street/Route 152 to add one eastbound lane from Church Street to Monterey Street			
22834	Widen Route 237 for eastbound auxiliary lane from Mathilda Avenue to Fair Oaks Avenue			
22838	Study of Lawrence Expressway/Calvert/I-280 interchange improvements (Caltrans Project Study Report)			
22839	Convert HOV lane to mixed-flow lane on Central Expressway between San Tomas and De La Cruz (including removing HOV queue jump lanes at Bowers)			
22840	Study to reconfigure Route 85/Almaden Expressway interchange (Caltrans Project Study Report/Project Development Study)			
22843	Widen Lawrence Expressway between Moorpark/Bollinger and south of Calvert from 6 lanes to 8 lanes			
22845	Construct US 101 southbound auxiliary lane from Ellis Street to eastbound Route 237		-	
22854	I-280/Oregon-Page Mill interchange modification			
22857	Widen US 101 for a southbound auxiliary lane from I-880 to McKee Road/Julian Street			
22872	Widen Montague Expressway for HOV lanes between I-880 and I-680 (6 mixed-flow, 2 HOV lanes)			

#### Table D-I: Transportation 2030 Plan Projects Excluded from TRANSDEF Smart Growth Alternative

I = Approved Sales Tax Project, 2= Regional Measure I Project, 3= Regional Measure 2 Project

Project ID	Project/Program	1	2	3
22878	Realign Wildwood Avenue to connect with Lawrence Expressway (includes new traffic signal at Lawrence Expressway/Wildwood Avenue intersection)			
22881	Construct auxiliary lane on southbound Lawrence Expressway between westbound Route 237 and southbound Lawrence Expressway			
22883	Modify medians on Lawrence Expressway from De Sota Avenue and St. Lawrence Drive/Lawrence Station Road for limited access			
22892	Widen US 101 southbound auxiliary lane from Great America Parkway to Lawrence Expressway			
22893	Widen US 101 for a northbound auxiliary lane from McKee/Julian Street to I-880			
22894	US 101 Mabury Road/Taylor Street new interchange (environmental and preliminary engineering)			
22895	San Tomas Expressway/Route 17 interchange operational improvements			
22897	Widen I-680 northbound for an HOV lane from Route 84 to Calavaras Boulevard			
22987	Java Drive bikeway between Mathilda Avenue and Crossman Avenue			
98103	Construct auxiliary lane on northbound Route 17 from Camden Avenue to Hamilton Avenue (including improvements to northbound on-ramp from Camden Avenue)	~		
Solano				
21807	Widen I-80 from I-680 to Air Base Parkway from 8 lanes to 10 lanes for HOV lanes (includes a braided ramp from I-680 to Suisun Valley Road and improvements to Red Top Road)			1
22700	Construct parallel corridor north of I-80 from Red Top Road to Abernathy Road (the western section extends from the railroad crossing on Red Top Road to Business Center Drive)			
22701	1-80/1-680/Route 12 interchange improvements (includes truck scales and auxiliary lanes) (as identified in 1-80/1-680/1-780 Corridor Study)			
22703	I-80/I-680/I-780 corridor mid-term capacity and operation improvements except transit hubs and park and ride lots (as identified in I-80/I-680/I-780 Corridor Study)			
22708	Route 12 from I-80 to Sacramento Bridge long-term capacity and operational improvements (as identified in Route 12 Major Investment Study(MIS))			
22898	Widen I-80 from west of Meridian Road to west of Kidwell Road from 6 lanes to 8 lanes			
94151	Construct 4-lane Jepson Parkway from Route 12 to Leisure Town Road		-	
94152	Widen Route 12 (Jameson Canyon) from I-80 in Solano County to Route 29 in Napa County from 2 lanes to 4 lanes (Solano County portion of project)			
Sonoma				
21902	Widen US 101 for HOV lanes from Old Redwood Highway to Rohnert Park Expressway			
98147	Widen US 101 from Route 116 east to the Marin/Sonoma County line from 4 lanes to 6 lanes (including 2 HOV lanes), upgrade Petaluma Bridge, and convert some highway sections to freeway standards			
98183	Widen US 101 for HOV lanes between Steele Lane and Windsor River Road			

### Table D-I: Transportation 2030 Plan Projects Excluded from TRANSDEF Smart Growth Alternative I = Approved Sales Tax Project, 2 = Regional Measure 1 Project, 3 = Regional Measure 2 Project

	ales Tax Project, 2= Regional Measure 1 Project, 3= Regional Measure 2 Project	1	2	3
Project ID	Project/Program		2	3
	Sales Tax Projects (Vision Element)			
Contra Co				,
21223	I-680 transit corridor improvements (including express bus service enhancements and improved connections to BART)			
22122	Ferry service in western Contra Costa County (Richmond and Hercules or Rodeo) - Resolution 3434 project			1
22350	I-680/Route 4 interchange improvements (Phases 3 through 5) and HOV flyover ramps		~	
22351	I-680 northbound HOV gap closure between North Main Street and Route 242			
22352	I-680/Norris Canyon Road HOV direct ramps in San Ramon			
22354	I-680/Marina Vista interchange improvements			
22355	I-80/Central Avenue interchange modifications			
22360	I-80/San Pablo Dam Road interchange reconstruction			
22365	Martinez Ferry landside improvements			
22382	Richmond Parkway/San Pablo Avenue grade separated interchange		1	
22383	Upgrade Richmond Parkway geometry to principal arterial standards		1	
22388	Construct Route 242/Clayton Road northbound on-ramp			
22389	Construct Route 242/Clayton Road southbound off-ramp			
22390	Reconstruct Route 4/Willow Pass Road ramps in Concord			
22604	Construct safety and operational improvements (including potential realignment) on Vasco Road from Brentwood to Alameda County line			
22605	Route 4 Bypass, Segments 2 & 3: widen and upgrade to full freeway (widen segment 2 to 6 lanes from Lone Tree to Balfour, and widen segment 3 to 4 lanes from Balfour to Walnut)			
22607	Major streets widening, extensions and interchange improvements (East County)			
22609	Major streets widening, extensions and interchange improvements (Central County)			
22610	Major streets widening, extensions and interchange improvements (West County)			
22612	I-680/Sycamore Valley Road direct HOV ramps in Danville			11
22613	Major streets widening, extensions and interchange improvements (Southwest County)			
22981	Widen Route 4 as continuous 4-lane arterial from Marsh Creek Road to San Joaquin County line			
San Mateo				) I
21604	US 101 auxiliary lanes from Sierra Point to San Francisco County line	~	-	
21609	I-280/I-380 local access improvements from Sneath Lane and San Bruno Avenue to I- 380	~		
21610	US 101 auxiliary lanes from San Bruno Avenue to Grand Avenue	~		
21892	Widen Route 84 from 4 lanes to 6 lanes from El Camino Real to Broadway	~		
21893	Route 92 between Half Moon Bay city limits and Pilarcitos Creek alignment and shoulder improvements			
22120	Ferry service from Redwood City to San Francisco to Alameda (Resolution 3434)			1
22228	Ext Lagoon Way to connect to US 101, Bayshore Blvd, Guadalupe Canyon Pkwy	1		
22229	US 101/Sierra Point Parkway interchange replacement	1		-' =

#### Table D-I: Transportation 2030 Plan Projects Excluded from TRANSDEF Smart Growth Alternative

I = Approved Sales Tax Project, 2= Regional Measure I Project, 3= Regional Measure 2 Project

Project ID	Project/Program	1	2	3
22231	Widen north side of John Daly Boulevard/I-280 overcrossing for additional westbound traffic lane and dedicated right-turn lane for southbound I-280 off-ramp	1		
22271	Widen Skyline Boulevard (Route 35) to 4-lane roadway from I-280 to Sneath Lane			
22273	US 101/Candlestick interchange reconstruction (Phase 2)	1		
22279	US 101/Produce Avenue interchange project			
22615	Dumbarton Rail Corridor and station improvements			
22622	Manor Drive/Route 1 overcrossing widening and improvement project			
22719	Dumbarton rail corridor (Phase 2)	1		
22723	Improvement of Dumbarton Bridge access to US 101 (Phase 2)			
22725	1-280/Route 1 interchange improvements	1		
22726	South San Francisco to Alameda ferry service (Resolution 3434)			1
22727	US 101/Peninsula Avenue southbound ramps	$\checkmark$		
22729	I-280 auxiliary lanes from I-380 to Hickey Boulevard	$\checkmark$		
22739	US 101 operational improvements near Route 92			
22751	Route 1 operational and safety improvements in Half Moon Bay area	1		
94644	Route 92 westbound slow vehicle lane between Route 35 and I-280			
Solano				
21824	Route 12 from I-80 to Sacramento Bridge capacity and operational improvements as identified in Route 12 Major Investment Study			
22702	I-80/I-680/Route 12 interchange improvements: truck scales and auxiliary lanes (Phases 3 and 4)			
22710	Non-capacity-increasing safety projects to improve congested intersections, local arterials and highways			
22712	Express bus capital and operating			
22717	I-80/I-680/I-780 corridor improvements (midterm projects except transit hubs and park-and-ride lots)			
Sonoma				
22190	Hwy 116/Hwy 121 intersection improvements and Arnold Drive improvements			
22191	US 101/Airport Boulevard interchange improvements			
22192	Widen Airport Boulevard from 2 lanes to 4 lanes (also includes a center turn lane)			
22193	Construct Forestville bypass on Route 116			
22195	Old Redwood Highway/US 101 interchange improvements			
22197	Penngrove local road improvements including Railroad Avenue interchange			
22203	River Road channelization and signals from Fulton Road to the town of Guerneville			
22204	Widen Fulton Road from Guerneville Road to US 101 from 2 lanes to 4 lanes			
22205	US 101/Hearn Avenue interchange improvements; including widening overcrossing and ramps			
22206	Construct Route 12/Fulton Road interchange			
22207	Extend Farmers Lane as a 3-lane or 4-lane arterial from Bellevue Avenue to Route 12			
22443	Design, project development, and financing costs for widening US 101			

Transportation 2030 Plan Draft Environmental Impact Report

This page intentionally left blank.

# Appendix D.2: Comparison of ABAG and TRANSDEF Projections, 2000 – 2030

As described in Appendix D.1, the TRANSDEF alternative uses different future land use distribution projections as the basis for analysis. The TRANSDEF team provided MTC zone-level data for four specific variables: employed residents, total employment, residential acres and commercial/industrial acres. Tables on the following pages summarize 2000-2030 growth in each superdistrict for all of the key variables used for transportation modeling and impact analysis. These tables (Table D-2 through D-15) include comparative information on: total population, household population, total households, income, employed residents, employment, residential, commercial and industrial land use acreage, and household vehicles. The maps presented after the tables show zone-level differences in the 2030 projections for the TRANSDEF Smart Growth land use assumptions compared to ABAG *Projections 2003*.

To develop this data base, MTC used a SAS script to merge the TRANSDEF database with the ABAG *Projections 2003* data to create a master zonal data file for the TRANSDEF alternative. In terms of methodology, the ratio of the TRANSDEF employed residents to ABAG's *Projections 2003*, year 2030 employed residents was used to adjust: total households, household population, and households by income quartile. The ABAG projected group quarters population for 2030 was added to the TRANDEF-derived household population to obtain total population.

Certain zone-level variables were not adjusted for the TRANSDEF data, including: average household size; average workers per household; group quarters population; share of population by age cohort; share of households by income level; group mean household income; overall mean household income; share of employment by employment sector; and total acres.

The persons per household and workers per household were inspected at the zone-level, and are identical at the zone-level, comparing ABAG *Projections 2003* and the TRANSDEF-2030.

The proportion of households that are single-family versus multi-family is an important variable in the MTC vehicle ownership model. Zones with higher shares of multi-family dwelling units tend to have lower vehicle ownership levels. Zones with high shares of single-family dwelling units have higher vehicle ownership levels.

The MTC vehicle ownership model (WHHAO) also predicts the distribution of households by workers in the household. Inputs to this model are the number of households by the four income quartiles. Outputs from this model are the number of households by income quartile by workers in household (0, 1, 2+) and by vehicles available in the household (0, 1, 2+). Other input variables to the WHHAO model include group mean household income, average household size, share of population 62-or-older (to predict retired households) and gross population density. Gross population density is a surrogate variable for residential parking density, residential parking costs, land use mixing, and the general effects of urban culture on reducing or increasing auto ownership. Another key variable is the ratio of transit-to-highway accessibility, which is important in using the influence of transit service levels in moderating the growth in auto ownership. ABAG does not forecast the split of households that are single-family versus multi-family. This has always been a task for MTC staff. Previous models used a very simple model that used the historic census split of single-family versus multi-family and applied this historic split to all future values.

MTC has since developed a model that estimates the proportion of households that are multifamily based on the changes in net residential density. TRANSDEF members initially suggested an alternate methodology that assumes that all new households, formed after year 2000, are multifamily dwelling unit households. After analysis of the implications of this assumption, TRANSDEF agreed that it would be more appropriate to use an adjusted version of the MTC SFDU/MFDU model to make the housing type determination. Accordingly, MTC applied the adjusted SFDU/MFDU model to the TRANSDEF data. The results show 110 thousand fewer single family dwelling units and 150 thousand more multi-family dwelling units compared to the Projections 2003-based estimates. Details on where these changes occurred in each superdistrict are shown in Tables D-10 and D-11.

### Table D-2: Compare Total Population by MTC 34 Superdistrict & County, 2000-2030 ABAG Projections 2003 & TRANSDEF Smart Growth Alternative

TTOP	ABAG Projections 2003			TRANSDEF		Percent	
	Superdistrict 2000 2005 2030		· · · · · · · · · · · · · · · · · · ·	2030	Difference	Difference	
1	Downtown San Francisco	125,742	130,866	162,818	193,199	30,381	18.7%
2	Richmond District	206,546	211,530	223,553	229,578	6,025	2.7%
3	Mission District	312,465	321,701	407,883	459,000	51,117	12.5%
4	Sunset District	131,980	134,485	140,813	147,989	7,176	5.1%
5	Daly City/San Bruno	287,439	296,220	337,173	343,525	6,352	1.9%
6	San Mateo/Burlingame	201,522	211,296	238,137	241,658	3,521	1.5%
7	Redwood City/Menlo Park	218,202	226,587	270,633	280,901	10,268	3.8%
8	Palo Alto/Los Altos	168,940	174,214	201,295	200,590	-705	-0.4%
9	Sunnyvale/Mountain View	225,943	239,451	325,072	332,791	7,719	2.4%
10	Saratoga/Cupertino	309,254	322,498	352,385	351,632	-753	-0.2%
11	Central San Jose	284,443	312,626	479,534	509,963	30,429	6.3%
12	Milpitas/East San Jose	381,056	405,088	515,727	501,288	-14,439	-2.8%
13	South San Jose/Almaden	215,121	223,694	248,325	240,629	-7,696	-3.1%
14	Gilroy/Morgan Hill	97,828	110,727	151,825	120,294	-31,531	-20.8%
15	Livermore/Pleasanton	171,652	198,163	288,409	250,037	-38,372	-13.3%
16	Fremont/Union City	311,764	332,413	404,510	371,995	-32,515	-8.0%
17	Hayward/San Leandro	351,568	370,034	422,329	399,274	-23,055	-5.5%
18	Oakland/Alameda	454,351	473,598	588,074	607,236	19,162	3.3%
19	Berkeley/Albany	154,406	160,184	184,952	168,728	-16,224	-8.8%
20	Richmond/El Cerrito	242,439	252,984	298,804	329,184	30,380	10.2%
21	Concord/Martinez	221,068	232,890	282,716	265,850	-16,866	-6.0%
22	Walnut Creek/Lamorinda	139,416	144,162	164,363	214,113	49,750	30.3%
23	Danville/San Ramon	114,919	125,878	165,399	140,106	-25,293	-15.3%
24	Antioch/Pittsburg	230,974	257,276	346,004	275,257	-70,747	-20.4%
25	Vallejo/Benicia	146,849	157,980	194,181	235,643	41,462	21. <del>4</del> %
26	Fairfield/Vacaville	247,693	282,215	383,106	311,371	-71,735	-18.7%
27	Napa	87,085	93,895	112,426	128,360	15,934	14.2%
28	St. Helena/Calistoga	37,194	38,902	41,077	47,686	6,609	16.1%
29	Petaluma/Sonoma	160,818	174,749	190,919	203,668	12,749	6.7%
30	Santa Rosa/Sebastopol	219,409	235,269	275,304	299,163	23,859	8.7%
31	Healdsburg/Cloverdale	78,387	87,791	99,483	88,191	-11,292	-11.4%
32	Novato	54,506	56,816	68,668	69,969	1,301	1.9%
33	San Rafael	103,658	106,622	114,709	122,936	8,227	7.2%
34	Mill Valley/Sausalito	89,125	91,100	99,711	98,513	-1,198	-1.2%
	Bay Area	6,783,762	7,193,904	8,780,317	8,780,317	0	0.0%
	San Francisco	776,733	798,582	935,067	1,029,766	94,699	10.1%
	San Mateo	707,163	734,103	845,943	866,084	20,141	2.4%
	Santa Clara	1,682,585	1,788,298	2,274,163	2,257,187	-16,976	-0.7%
	Alameda	1,443,741	1,534,392	1,888,274	1,797,270	-91,004	-4.8%
	Contra Costa	948,816	1,013,190	1,257,286	1,224,510	-32,776	-2.6%
	Solano	394,542	440,195	577,287	547,014	-30,273	-5.2%
	Napa	124,279	132,797	153,503	176,046	22,543	14.7%
	Sonoma	458,614	497,809	565,706	591,022	25,316	4.5%
	Marin	247,289	254,538	283,088	291,418	8,330	2.9%

Table D-3: Compare Household Population	by MTC 34 Superdistrict & County, 2000-2030 ABAG
Projections 2003 & TRANSDEF Smart Grov	wth Alternative

•		ABAG Projections 2003			TRANSDEF		Percent
	Superdistrict	2000	2005	2030	2030	Difference	Difference
1	Downtown San Francisco	118,588	123,297	155,110	185,491	30,381	19.6%
2	Richmond District	201,401	206,089	218,011	224,036	6,025	2.8%
3	Mission District	307,120	316,049	402,141	453,258	51,117	12.7%
4	Sunset District	129,868	132,252	138,538	145,714	7,176	5.2%
5	Daly City/San Bruno	284,856	293,503	334,234	340,586	6,352	1.9%
6	San Mateo/Burlingame	198,170	207,768	234,105	237,626	3,521	1.5%
7	Redwood City/Menlo Park	213,687	221,837	265,483	275,751	10,268	3.9%
8	Palo Alto/Los Altos	160,974	165,930	192,912	192,207	-705	-0.4%
9	Sunnyvale/Mountain View	223,565	236,982	322,560	330,279	7,719	2.4%
10	Saratoga/Cupertino	306,217	319,338	349,200	348,447	-753	-0.2%
11	Central San Jose	275,255	303,071	469,785	500,214	30,429	6.5%
12	Milpitas/East San Jose	376,119	399,959	510,475	496,036	-14,439	-2.8%
13	South San Jose/Almaden	214,616	223,169	247,795	240,099	-7,696	-3.1%
14	Gilroy/Morgan Hill	96,124	108,952	149,949	118,418	-31,531	-21.0%
15	Livermore/Pleasanton	165,886	191,906	281,665	243,293	-38,372	-13.6%
16	Fremont/Union City	309,575	330,037	402,065	369,550	-32,515	-8.1%
17	Hayward/San Leandro	345,965	363,954	415,767	392,712	-23,055	-5.5%
18	Oakland/Alameda	446,424	464,994	578,750	597,912	19,162	3.3%
19	Berkeley/Albany	148,157	153,402	177,646	161,422	-16,224	-9.1%
20	Richmond/El Cerrito	239,735	250,245	295,965	326,345	30,380	10.3%
21	Concord/Martinez	217,771	229,548	279,080	262,214	-16,866	-6.0%
22	Walnut Creek/Lamorinda	136,489	141,194	161,186	210,936	49,750	30.9%
23	Danville/San Ramon	114,030	124,977	164,398	139,105	-25,293	-15.4%
24	Antioch/Pittsburg	229,454	255,734	344,462	273,715	-70,747	-20.5%
25	Vallejo/Benicia	144,997	156,105	192,306	233,768	41,462	21.6%
26	Fairfield/Vacaville	233,571	267,896	368,587	296,852	-71,735	-19.5%
27	Napa	84,388	91,113	109,374	125,308	15,934	14.6%
28	St. Helena/Calistoga	34,658	36,285	38,331	44,940	6,609	17.2%
29	Petaluma/Sonoma	156,799	170,730	186,800	199,549	12,749	6.8%
30	Santa Rosa/Sebastopol	213,963	229,823	269,662	293,521	23,859	8.8%
31	Healdsburg/Cloverdale	76,750	86,154	97,746	86,454	-11,292	-11.6%
32	Novato	53,519	55,828	67,583	68,884	1,301	1.9%
33	San Rafael	100,342	103,303	111,176	119,403	8,227	7.4%
34	Mill Valley/Sausalito	81,942	83,909	92,319	91,121	-1,198	-1.3%
	Bay Area	6,640,975	7,045,333	8,625,166	8,625,166	0	0.0%
	San Francisco	756,977	777,687	913,800	1,008,499	94,699	10.4%
	San Mateo	696,713	723,108	833,822	853,963	20,141	2.4%
	Santa Clara	1,652,870	1,757,401	2,242,676	2,225,700	-16,976	-0.8%
	Alameda	1,416,007	1,504,293	1,855,893	1,764,889	-91,004	-4.9%
	Contra Costa	937,479	1,001,698	1,245,091	1,212,315	-32,776	-2.6%
	Solano	378,568	424,001	560,893	530,620	-30,273	-5.4%
	Napa	119,046	127,398	147,705	170,248		15.3%
	Sonoma	447,512	486,707	554,208	579,524	25,316	4.6%
	Marin	235,803	243,040	271,078	279,408	8,330	3.1%

### Table D-4: Compare Total Households by MTC 34 Superdistrict & County, 2000-2030 ABAG Projections 2003 & TRANSDEF Smart Growth Alternative

		ABAG Projections 2003 T		TRANSDEF		Percent	
	Superdistrict	2000	2005	2030	2030	Difference	Difference
	Downtown San Francisco	68,139	70,457	90,839	107,500	16,661	18.3%
2	Richmond District	102,163	103,795	111,993	113,572	1,579	1.4%
3	Mission District	110,434	112,872	146,876	166,281	19,405	13.2%
4	Sunset District	48,961	49,527	52,886	54,834	1,948	3.7%
5	Daly City/San Bruno	96,371	98,356	112,182	113,573	1,391	1.2%
6	San Mateo/Burlingame	80,400	83,388	94,154	95,185	1,031	1.1%
7	Redwood City/Menlo Park	77,333	79,207	94,676	100,233	5,557	5.9%
8	Palo Alto/Los Altos	68,068	69,733	83,015	81,924	-1,091	-1.3%
9	Sunnyvale/Mountain View	88,679	93,475	129,646	131,929	2,283	1.8%
10	Saratoga/Cupertino	116,842	120,875	134,580	133,202	-1,378	-1.0%
11	Central San Jose	92,049	100,776	155,052	164,897	9,845	6.3%
12	Milpitas/East San Jose	99,420	105,073	136,508	130,620	-5,888	-4.3%
13	South San Jose/Almaden	71,320	73,637	82,963	79,451	-3,512	-4.2%
14	Gilroy/Morgan Hill	29,484	33,174	46,281	36,092	-10,189	-22.0%
15	Livermore/Pleasanton	60,487	68,513	101,460	87,132	-14,328	-14.1%
16	Fremont/Union City	99,510	103,601	126,244	115,518	-10,726	-8.5%
17	Hayward/San Leandro	122,610	126,105	145,020	136,469	-8,551	-5.9%
18	Oakland/Alameda	172,049	175,536	221,842	224,959	3,117	1.4%
19	Berkeley/Albany	68,709	69,639	81,356	73,139	-8,217	-10.1%
20	Richmond/El Cerrito	85,492	88,716	106,677	115,171	8,494	8.0%
21	Concord/Martinez	83,827	87,742	107,839	101,202	-6,637	-6.2%
22	Walnut Creek/Lamorinda	59,110	60,836	71,105	92,701	21,596	30.4%
23	Danville/San Ramon	41,471	45,304	61,439	51,788	-9,651	-15.7%
24	Antioch/Pittsburg	74,229	82,313	112,824	88,623	-24,201	-21.5%
25	Vallejo/Benicia	50,961	53,728	67,476	84,846	17,370	25.7%
26	Fairfield/Vacaville	79,442	89,448	125,894	100,499	-25,395	-20.2%
27	Napa	31,209	33,607	41,328	47,178	5,850	14.2%
28	St. Helena/Calistoga	14,193	14,834	15,904	18,967	3,063	19.3%
29	Petaluma/Sonoma	60,448	64,788	72,343	76,080	3,737	5.2%
30	Santa Rosa/Sebastopol	82,438	87,101	103,497	112,731	9,234	8.9%
31	Healdsburg/Cloverdale	29,517	32,502	37,317	32,601	-4,716	-12.6%
32	Novato	21,176	21,866	26,731	26,950	219	0.8%
33	San Rafael	41,527	42,308	45,902	48,864	2,962	6.5%
34	Mill Valley/Sausalito	37,947	38,515	42,743	41,887	-856	-2.0%
	Bay Area	2,466,015	2,581,347	3,186,592	3,186,598	6	0.0%
	San Francisco	329,697	336,651	402,594	442,187	39,593	9.8%
	San Mateo	254,104	260,951	301,012	308,991	7,979	2.7%
	Santa Clara	565,862	596,743	768,045	758,115	-9,930	-1.3%
	Alameda	523,365	543,394	675,922	637,217	-38,705	-5.7%
	Contra Costa	344,129	364,911	459,884	449,485	-10,399	-2.3%
	Solano	130,403	143,176	193,370	185,345	-8,025	-4.2%
	Napa	45,402	48,441	57,232	66,145	8,913	15.6%
	Sonoma	172,403	184,391	213,157	221,412	8,255	3.9%
	Marin	100,650	102,689	115,376	117,701	2,325	2.0%

#### Transportation 2030 Plan Draft Environmental Impact Report

 Table D-5: Compare Mean Household Income by MTC 34 Superdistrict & County, 2000-2030 ABAG

 Projections 2003 & TRANSDEF Smart Growth Alternative

	bjections 2003 & I KANSDE		Projections 200	TRANSDEF		Percent	
	Superdistrict	2000	2005	2030	2030	Difference	Difference
1	Downtown San Francisco	\$46,835	\$47,865	\$63,628	\$67,048	\$3,420	5.4%
2	Richmond District	\$72,131	\$72,994	\$92,021	\$93,096	\$1,075	1.2%
3	Mission District	\$59,716	\$59,743	\$75,041	\$75,980	\$939	1.3%
4	Sunset District	\$62,318	\$60,553	\$77,923	\$79,347	\$1,424	1.8%
5	Daly City/San Bruno	\$66,690	\$67,999	\$86,355	\$87,126	\$772	0.9%
6	San Mateo/Burlingame	\$91,490	\$91,435	\$119,979	\$118,956	-\$1,023	-0.9%
7	Redwood City/Menlo Park	\$102,380	\$103,070	\$130,095	\$127,296	-\$2,799	-2.2%
8	Palo Alto/Los Altos	\$97,455	\$98,090	\$126,025	\$126,242	\$216	0.2%
9	Sunnyvale/Mountain View	\$67,517	\$68,900	\$83,739	\$85,354	\$1,615	1.9%
10	Saratoga/Cupertino	\$83,424	\$83,888	\$111,962	\$112,196	\$234	0.2%
11	Central San Jose	\$54,893	\$53,760	\$68,940	\$69,581	\$641	0.9%
12	Milpitas/East San Jose	\$70,143	\$70,384	\$92,951	\$92,457	-\$494	-0.5%
13	South San Jose/Almaden	\$74,634	\$74,608	\$98,306	\$98,849	\$544	0.6%
14	Gilroy/Morgan Hill	\$70,497	\$71,511	\$95,850	\$95,938	\$88	0.1%
15	Livermore/Pleasanton	\$74,816	\$76,097	\$94,744	\$94,779	\$36	0.0%
16	Fremont/Union City	\$68,100	\$67,233	\$85,512	\$85,405	-\$107	-0.1%
17	Hayward/San Leandro	\$49,439	\$49,713	\$63,444	\$64,693	\$1,250	2.0%
18	Oakland/Alameda	\$47,970	\$47,222	\$60,314	\$60,378	\$63	0.1%
19	Berkeley/Albany	\$52,342	\$52,847	\$67,442	\$67,317	-\$124	-0.2%
20	Richmond/El Cerrito	\$47,337	\$47,350	\$63,223	\$64,146	\$923	1.5%
21	Concord/Martinez	\$55,521	\$56,092	\$71,378	\$72,170	\$792	1.1%
22	Walnut Creek/Lamorinda	\$80,403	\$80,751	\$104,465	\$102,314	-\$2,151	-2.1%
23	Danville/San Ramon	\$105,766	\$107,522	\$135,403	\$134,845	-\$557	-0.4%
24	Antioch/Pittsburg	\$50,106	\$51,996	\$64,822	\$65,648	\$827	1.3%
25	Vallejo/Benicia	\$47,921	\$47,631	\$64,141	\$57,101	-\$7,040	-11.0%
26	Fairfield/Vacaville	\$49,040	\$48,091	\$61,445	\$60,966	-\$479	-0.8%
27	Napa	\$48,051	\$51,036	\$65,906	\$63,515	-\$2,392	-3.6%
28	St. Helena/Calistoga	\$65,028	\$70,932	\$94,960	\$91,737	-\$3,223	-3.4%
29	Petaluma/Sonoma	\$53,500	\$56,126	\$72,551	\$73,927	\$1,376	1.9%
30	Santa Rosa/Sebastopol	\$50,402	\$51,669	\$67,006	\$67,201	\$196	0.3%
31	Healdsburg/Cloverdale	\$51,225	\$53,578	\$68,343	\$70,414	\$2,072	3.0%
32	Novato	\$63,115	\$61,720	\$76,977	\$77,664	\$687	0.9%
33	San Rafael	\$67,385	\$67,549	\$87,428	\$87,299	-\$129	-0.1%
34	Mill Valley/Sausalito	\$100,420	\$99,759	\$128,291	\$128,996	\$705	0.5%
	Bay Area	\$64,915	\$65,248	\$83,302	\$83,336	\$35	0.0%
	San Francisco	\$61,287	\$61,461	\$81,029	\$78,622	-\$2,407	-3.09
	San Mateo	\$85,399	\$86,133	\$115,564	\$109,962	-\$5,602	-4.89
	Santa Clara	\$73,863	\$73,901	\$98,415	\$94,200		-4.39
	Alameda	\$55,818	\$55,977	\$74,918	\$71,340		-4.8%
	Contra Costa	\$62,649	\$63,539	\$85,225	\$82,266		-3.5%
	Solano	\$48,603	\$47,919	\$65,034	\$59,196		-9.09
	Napa	\$53,358	\$57,129	\$77,283	\$71,607		-7.3%
	Sonoma	\$51,629	\$53,571	\$72,208	\$69,985		-3.19
	Marin	\$78,942	\$78,388	\$104,617	\$99,932	-\$4,685	-4.59

# Table D-6: Compare Employed Residents by MTC 34 Superdistrict & County, 2000-2030 ABAG Projections 2003 & TRANSDEF Smart Growth Alternative

		ABAG Projections 2003		TRANSDEF		Percent	
	Superdistrict	2000	2005	2030	2030	Difference	Difference
1	Downtown San Francisco	67,021	66,175	98,901	114,311	15,410	15.6%
2	Richmond District	129,693	126,105	150,078	154,485	4,407	2.9%
3	Mission District	162,150	158,499	221,159	248,452	27,293	12.3%
4	Sunset District	69,195	67,042	77,363	81,516	4,153	5.4%
5	Daly City/San Bruno	145,158	143,219	191,889	196,086	4,197	2.2%
6	San Mateo/Burlingame	107,550	108,099	146,236	148,927	2,691	1.8%
7	Redwood City/Menlo Park	109,012	108,116	152,576	160,729	8,153	5.3%
8	Palo Alto/Los Altos	88,209	85,539	126,344	127,588	1,244	1.0%
9	Sunnyvale/Mountain View	124,983	124,804	205,533	211,426	5,893	2.9%
10	Saratoga/Cupertino	159,059	155,963	217,790	218,328	538	0.2%
11	Central San Jose	137,328	143,433	254,990	271,513	16,523	6.5%
12	Milpitas/East San Jose	175,469	176,280	272,475	265,606	-6,869	-2.5%
13	South San Jose/Almaden	112,802	110,368	156,234	152,024	-4,210	-2.7%
14	Gilroy/Morgan Hill	46,887	50,383	80,025	63,144	-16,881	-21.1%
15	Livermore/Pleasanton	89,160	101,478	175,552	153,831	-21,721	-12.4%
16	Fremont/Union City	153,519	161,510	239,371	221,824	-17,547	-7.3%
17	Hayward/San Leandro	164,659	170,589	229,849	218,952	-10,897	-4.7%
18	Oakland/Alameda	202,143	207,125	304,153	308,631	4,478	1.5%
	Berkeley/Albany	84,712	86,315	114,276	103,749	-10,527	-9.2%
20	Richmond/El Cerrito	109,135	114,585	156,209	169,277	13,068	8.4%
21	Concord/Martinez	113,130	120,165	172,317	163,352	-8,965	-5.2%
22	Walnut Creek/Lamorinda	67,122	69,890	93,705	126,286	32,581	34.8%
23	Danville/San Ramon	59,965	66,629	103,784	88,902	-14,882	-14.3%
24	Antioch/Pittsburg	102,637	115,515	178,727	141,917	-36,810	-20.6%
25	Vallejo/Benicia	67,090	73,858	103,452	119,563	16,111	15.6%
26	Fairfield/Vacaville	111,913	130,829	202,047	163,230	-38,817	-19.2%
27	Napa	40,508	43,184	60,862	67,359	6,497	10.7%
28	St. Helena/Calistoga	18,081	18,595	22,135	25,191	3,056	13.8%
29	Petaluma/Sonoma	82,841	92,065	108,285	116,458	8,173	7.5%
30	Santa Rosa/Sebastopol	108,296	118,730	149,258	163,105	13,847	9.3%
31	Healdsburg/Cloverdale	38,843	44,279	51,554	45,751	-5,803	-11.3%
32	Novato	28,540	29,912	41,503	42,413	910	2.2%
33	San Rafael	54,652	56,346	66,478	71,736	5,258	7.9%
34		45,910	47,190	58,119	57,639	-480	-0.8%
	Bay Area	3,377,372	3,492,814	4,983,229	4,983,301	72	0.0%
	San Francisco	428,059	417,821	547,501	598,764	51,263	9.4%
	San Mateo	361,720	359,434	490,701	505,742	15,041	3.1%
	Santa Clara	844,737	846,770	1,313,391	1,309,629	-3,762	-0.3%
	Alameda	694,193	727,017	1,063,201	1,006,987	-56,214	-5.3%
	Contra Costa	451,989	486,784	704,742	689,734	-15,008	-2.1%
	Solano	179,003	204,687	305,499	282,793	-22,706	-7.4%
	Napa	58,589	61,779	82,997	92,550	9,553	11.5%
	Sonoma	229,980	255,074	309,097	325,314	16,217	5.2%
	Marin	129,102	133,448	166,100	171,788	5,688	3.4%

Table D-7: Compare Total Employment by MTC 34 Superdistrict & County, 2000-2030	D
ABAG Projections 2003 & TRANSDEF Smart Growth Alternative	

		ABAG Projections 2003		3	TRANSDEF		Percent
	Superdistrict	2000	2005	2030	2030	Difference	Difference
1	Downtown San Francisco	386,585	394,752	489,191	495,957	6,766	1.4%
2	Richmond District	81,534	78,013	103,263	121,422	18,159	17.6%
3	Mission District	138,117	137,034	187,294	189,390	2,096	1.1%
4	Sunset District	28,216	25,715	35,473	35,154	-319	-0.9%
5	Daly City/San Bruno	163,295	162,678	227,295	240,168	12,873	5.7%
6	San Mateo/Burlingame	111,981	112,581	144,940	150,848	5,908	4.1%
7	Redwood City/Menlo Park	120,629	121,400	154,326	171,246	16,920	11.0%
8	Palo Alto/Los Altos	179,491	178,678	202,999	209,619	6,620	3.3%
9	Sunnyvale/Mountain View	372,458	370,141	467,849	493,819	25,970	5.6%
10	Saratoga/Cupertino	145,643	144,506	183,784	186,076	2,292	1.2%
11	Central San Jose	161,034	161,505	255,869	257,904	2,035	0.8%
12	Milpitas/East San Jose	120,310	118,062	171,727	184,824	13,097	7.6%
13	South San Jose/Almaden	71,208	69,742	101,265	94,172	-7,093	-7.0%
14	Gilroy/Morgan Hill	42,200	43,255	91,876	62,219	-29,657	-32.3%
15	Livermore/Pleasanton	119,075	125,067	211,513	186,791	-24,722	-11.7%
16	Fremont/Union City	145,553	I 56,442	228,417	185,983	-42,434	-18.6%
17	Hayward/San Leandro	163,593	170,622	216,889	230,825	13,936	6.4%
18	Oakland/Alameda	216,170	227,273	306,476	316,859	10,383	3.4%
19	Berkeley/Albany	107,279	110,994	124,068	131,869	7,801	6.3%
20	Richmond/El Cerrito	76,291	82,650	111,526	118,191	6,665	6.0%
21	Concord/Martinez	104,518	110,012	147,133	149,174	2,041	1.4%
22	Walnut Creek/Lamorinda	82,823	86,439	98,481	128,192	29,711	30.2%
23	Danville/San Ramon	53,803	58,697	80,629	61,758	-18,871	-23.4%
24	Antioch/Pittsburg	43,670	47,262	98,643	57,396	-41,247	-41.8%
25	Vallejo/Benicia	43,881	47,776	71,462	81,348	9,886	13.8%
26	Fairfield/Vacaville	79,330	85,854	133,211	120,203	-13,008	-9.8%
27	Napa	41,453	46,322	62,157	61,869	-288	-0.5%
28	St. Helena/Calistoga	25,381	25,937	26,841	26,927	86	0.3%
29	Petaluma/Sonoma	61,085	66,104	102,620	99,889	-2,731	-2.7%
30	Santa Rosa/Sebastopol	123,534	136,135	187,674	180,741	-6,933	-3.7%
31	Healdsburg/Cloverdale	20,602	22,022	30,719	25,048	-5,671	-18.5%
32	Novato	27,878	28,582	45,295	44,033	-1,262	-2.8%
33	San Rafael	52,911	54,042	63,854	69,152	5,298	8.3%
34	Mill Valley/Sausalito	42,175	42,666	54,815	50,899	-3,916	-7.1%
	Bay Area	3,753,706	3,848,960	5,219,574	5,219,965	391	0.0%
	San Francisco	634,452	635,514	815,221	841,923	26,702	3.3%
	San Mateo	395,905	396,659	526,561	562,262	35,701	6.8%
	Santa Clara	1,092,344	1,085,889	1,475,369	1,488,633	13,264	0.9%
	Alameda	751,670	790,398	1,087,363	1,052,327	-35,036	-3.2%
	Contra Costa	361,105	385,060	536,412	514,711	-21,701	-4.0%
	Solano	123,211	133,630	204,673	201,551	-3,122	-1.5%
	Napa	66,834	72,259	88,998	88,796	-202	-0.2%
	Sonoma	205,221	224,261	321,013	305,678	-15,335	-4.8%
	Marin	122,964	125,290	163,964	164,084	120	0.1%

# Table D-8: Compare Residential Acres by MTC 34 Superdistrict & County, 2000-2030 ABAG Projections 2003 & TRANSDEF Smart Growth Alternative

		ABAG Projections 2003		TRANSDEF		Percent	
	- Superdistrict	2000	2005	2030	2030	Difference	Difference
1	Downtown San Francisco	547	553	586	598	12	2.0%
2	Richmond District	2,259	2,275	2,318	2,318	0	0.0%
3	Mission District	4,025	4,072	4,279	4,441	162	3.8%
4	Sunset District	2,540	2,561	2,609	2,609	0	0.0%
5	Daly City/San Bruno	9,945	10,094	10,525	9,967	-558	-5.3%
6	San Mateo/Burlingame	16,715	17,174	18,535	16,725	-1,810	-9.8%
7	Redwood City/Menlo Park	34,320	35,295	37,131	34,341	-2,790	-7.5%
8	Palo Alto/Los Altos	17,931	18,126	18,526	17,948	-578	-3.1%
9	Sunnyvale/Mountain View	10,992	11,239	11,984	11,005	-979	-8.2%
10	Saratoga/Cupertino	28,375	28,774	29,228	28,379	-849	-2.9%
11	Central San Jose	12,404	12,640	13,451	12,478	-973	-7.2%
12	Milpitas/East San Jose	18,948	19,519	20,659	19,165	-1,494	-7.2%
13	South San Jose/Almaden	14,928	15,208	15,558	14,929	-629	-4.0%
14	Gilroy/Morgan Hill	13,779	15,024	19,492	13,779	-5,713	-29.3%
15	Livermore/Pleasanton	20,655	23,388	26,729	21,572	-5,157	-19.3%
16	Fremont/Union City	18,923	19,556	20,450	18,931	-1,519	-7.4%
17	Hayward/San Leandro	21,540	21,993	22,492	21,551	-941	-4.2%
18	Oakland/Alameda	18,629	18,786	19,434	18,765	-669	-3.4%
19	Berkeley/Albany	5,881	5,900	6,055	5,909	-146	-2.4%
20	Richmond/El Cerrito	11,616	11,965	13,311	1,670	-1,641	-12.3%
21	Concord/Martinez	15,800	16,371	17,835	15,865	-1,970	-11.0%
22	Walnut Creek/Lamorinda	19,317	19,751	20,839	19,358	-1,481	-7.1%
23	Danville/San Ramon	16,821	17,605	19,135	17,011	-2,124	-11.1%
24	Antioch/Pittsburg	16,495	18,239	21,692	17,026	-4,666	-21.5%
25	Vallejo/Benicia	7,752	8,037	8,506	8,094	-412	-4.8%
26	Fairfield/Vacaville	34,737	38,224	42,856	35,210	-7,646	-17.8%
27	Napa	7,586	7,950	8,961	8,025	-936	-10.4%
28	St. Helena/Calistoga	10,272	10,586	11,008	10,375	-633	-5.8%
29	Petaluma/Sonoma	38,637	40,696	41,928	39,203	-2,725	-6.5%
30	Santa Rosa/Sebastopol	58,457	60,275	62,512	59,270	-3,242	-5.2%
31	Healdsburg/Cloverdale	45,721	48,659	50,968	45,770	-5,198	-10.2%
32	Novato	6,733	6,903	7,501	7,060	-441	-5.9%
33	San Rafael	14,497	14,600	15,155	14,756	-399	-2.6%
34	Mill Valley/Sausalito	9,115	9,202	9,572	9,325	-247	-2.6%
	Bay Area	586,892	611,240	651,820	593,428	-58,392	-9.0%
	San Francisco	9,371	9,461	9,792	9,966	174	1.8%
	San Mateo	60,980	62,563	66,191	61,033	-5,158	-7.8%
	Santa Clara	117,357	120,530	128,898	117,683	-11,215	-8.7%
	Alameda	85,628	89,623	95,160	86,728	-8,432	-8.9%
	Contra Costa	80,049	83,931	92,812	80,930		-12.8%
	Solano	42,489	46,261	51,362	43,304		-15.7%
	Napa	17,858	18,536	19,969	18,400		-7.9%
	Sonoma	142,815	149,630	155,408	144,243	-11,165	-7.2%
	Marin	30,345	30,705	32,228	31,141	-1,087	-3.4%

#### Table D-9: Compare Commercial + Industrial Acres by MTC 34 Superdistrict & County, 2000-2030 ABAG Projections 2003 & TRANSDEF Smart Growth Alternative

		ABAG Projections 2003			TRANSDEF	Percent	
		2000	2005	2030	2030	Difference	Difference
I	Downtown San Francisco	1,395	1,397	1,399	1,387	-12	-0.9%
2	Richmond District	969	969	1,023	1,023	0	0.0%
3	Mission District	3,070	3,066	3,129	3,051	-78	-2.5%
4	Sunset District	438	435	442	442	0	0.0%
5	Daly City/San Bruno	8,545	8,549	8,642	8,592	-50	-0.6%
6	San Mateo/Burlingame	4,942	4,943	4,981	4,976	-5	-0.1%
7	Redwood City/Menlo Park	9,642	9,640	9,649	9,649	0	0.0%
8	Palo Alto/Los Altos	4,404	4,401	4,421	4,405	-16	-0.4%
9	Sunnyvale/Mountain View	17,015	17,007	17,112	16,921	-191	-1.1%
10	Saratoga/Cupertino	5,234	5,231	5,260	5,109	-151	-2.9%
11	Central San Jose	5,709	5,708	5,899	5,706	-193	-3.3%
12	Milpitas/East San Jose	6,354	6,356	6,386	6,267	-119	-1.9%
13	South San Jose/Almaden	3,134	3,132	3,264	3,097	-167	-5.1%
14	Gilroy/Morgan Hill	2,957	2,956	3,062	2,927	-135	-4.4%
15	Livermore/Pleasanton	9,100	9,097	9,342	9,165	-177	-1.9%
16	Fremont/Union City	10,311	10,311	10,575	10,317	-258	-2.4%
17	Hayward/San Leandro	12,115	12,121	12,237	12,129	-108	-0.9%
18	Oakland/Alameda	13,750	13,746	14,061	13,782	-279	-2.0%
19	Berkeley/Albany	3,413	3,416	3,484	3,424	-60	-1.7%
20	Richmond/El Cerrito	8,308	8,307	9,061	8,304	-757	-8.4%
21	Concord/Martinez	12,382	12,382	13,013	12,483	-530	-4.1%
22	Walnut Creek/Lamorinda	2,727	2,727	2,946	2,733	-213	-7.2%
23	Danville/San Ramon	2,274	2,272	2,703	2,275	-428	-15.8%
24	Antioch/Pittsburg	10,030	10,048	11,530	10,054	-1,476	-12.8%
25	Vallejo/Benicia	6,608	6,606	6,723	6,721	-2	0.0%
26	Fairfield/Vacaville	18,550	18,549	19,040	18,909	-131	-0.7%
27	Napa	2,601	2,599	2,729	2,704	-25	-0.9%
28	St. Helena/Calistoga	2,182	2,181	2,190	2,190	0	0.0%
29	Petaluma/Sonoma	11,047	11,043	11,161	11,161	0	0.0%
30	Santa Rosa/Sebastopol	9,515	9,515	9,569	9,487	-82	-0.9%
31	Healdsburg/Cloverdale	11,796	11,795	11,813	11,813	0	0.0%
32	Novato	2,414	2,414	2,419	2,419	0	0.0%
33	San Rafael	4,319	4,321	4,390	4,390	0	0.0%
34	Mill Valley/Sausalito	1,919	1,920	1,935	1,935	0	0.0%
	Bay Area	229,169	229,160	235,590	229,947	-5,643	-2.4%
	San Francisco	5,872	5,867	5,993	5,903	-90	-1.5%
	San Mateo	23,129	23,132	23,272	23,217	-55	-0.2%
	Santa Clara	44,807	44,791	45,404	44,432	-972	-2.1%
	Alameda	48,689	48,691	49,699	48,817	-882	-1.8%
	Contra Costa	35,721	35,736	39,253	35,849	-3,404	-8.7%
	Solano	25,158	25,155	25,763	25,630		-0.5%
	Napa	4,783	4,780	4,919	4,894	-25	-0.5%
	Sonoma	32,358	32,353	32,543	32,461	-82	-0.3%
	Marin	8,652	8,655	8,744	8,744	0	0.0%

### Table D-10: Compare Single-Family Households by MTC 34 Superdistrict & County, 2000-2030 ABAG Projections 2003 & TRANSDEF Smart Growth Alternative

Superdistrict         2000         2005         2030         Difference         Difference           1         Downtown San Francisco         2,246         2,282         2,360         2,557         197         8.3%           2         Richmond District         17,081         17,383         14,326         11,295         -3,031         -2,12%           3         Mission District         33,102         33,468         35,152         35,667         515         1.5%           5         Daly Ciry/San Bruno         66,445         67,743         74,982         70,913         -4,069         -5,4%           6         San Mateo/Burlingame         49,832         51,721         56,485         51,702         -3,826         -6,2%           8         Palo Alto/Los Altos         41,318         42,075         46,440         42,031         -4,494         -9,6%           10         Saratoga/Cupertino         80,572         83,494         91,453         87,606         -3,847         -4,2%           11         Central San Jose         51,382         55,256         71,910         67,350         -4,560         -4,587           12         Mipitazi/East San Jose         71,269         25,641         35,388		_	ABAG Projections 2003			TRANSDEF		Percent
I         Downtown San Francisco         2,246         2,282         2,360         2,557         197         8,3%           2         Richmond District         17,081         17,338         14,326         11,295         -3,031         -21,28           4         Sunset District         33,102         33,468         35,152         35,667         5,157         1.77           4         Sunset District         33,102         33,468         35,152         35,645         5,1702         -4,783         -8,5%           5         Daly City/San Bruno         66,445         67,743         74,982         70,913         -4,069         -5,4%           6         San Macco/Burlingame         49,832         51,721         -5,648         51,702         -4,783         -6,2%           8         Palo Alto/Los Altos         40,871         42,735         51,287         -4,630         -4,427           9         Sunnyvale/Mountain View         40,871         42,735         51,887         -3,847         -4,28           11         Central San Jose         51,382         25,256         71,910         67,350         -4,618         -71,18           14         Giirocy/Morgan Hill         12,2699         25,641		- Superdistrict	2000	2005	2030	2030	Difference	
2         Richmond District         17,081         17,338         14,326         11,235         -3,031         -21,2%           3         Mission District         55,300         56,226         66,256         65,099         -1,157         -1,7%           4         Sunset District         33,102         33,468         35,152         35,667         515         1.5%           5         Daly City/San Bruno         66,445         67,743         74,982         70,913         -4,069         -5.4%           6         San Maceo/Burlingame         49,832         51,721         56,485         51,702         4,783         -82,56           7         Red/woodCity/HenloPark         33,340         54,552         61,454         57,628         -3,826         -62,2%           8         Palo Alto/Los Altos         41,318         42,075         46,440         42,031         -4,409         -9,5%           9         Sunnyyale/Hountain View         40,871         42,735         51,287         46,540         -4,249         -1,62%           1         Central San Jose         51,382         55,203         57,032         63,514         59,036         -4,478         -7,1%           15         Livermore/Pleasanton </td <td>1</td> <td></td> <td>2,246</td> <td>2.282</td> <td>2.360</td> <td>2.557</td> <td></td> <td>8.3%</td>	1		2,246	2.282	2.360	2.557		8.3%
3         Mission District         55,300         56,226         66,256         65,099         -1,157         -1,7%           4         Sunset District         33,102         33,468         35,152         35,667         515         1,5%           5         Daly City/San Bruno         66,445         67,743         74,982         70,913         -4,069         -5,4%           6         San Mateo/Burlingame         49,832         51,721         56,485         51,702         -4,783         -8,5%           7         Redwood City/Mento Park         53,340         54,552         61,454         57,628         -3,826         -6,2%           8         Palo Atho/Los Attos         41,318         42,075         46,440         4,031         -4,409         -9,5%           9         Sunnyvale/Mountain View         40,871         42,735         51,287         71,910         67,350         -4,560         -6,3%           10         Cartral San Jose         51,382         55,256         71,910         67,350         -4,764         -7,1%           13         South San Jose/Almaden         55,203         57,032         63,514         59,036         -4,478         -7,1%           14         Giroy/Morgan Hill<	2						-3,031	
4         Sunset District         33,102         33,468         35,152         35,667         515         1.5%           5         Daly City/San Bruno         66,445         67,743         74,982         70,913         -4,069         -5,4%           6         San Mateo/Burlingame         49,832         51,721         56,485         51,702         -4,783         -622%           7         Redwood City/Mento Park         53,340         54,552         61,454         57,628         -3,826         -622%           8         Palo Alto/Los Altos         41,318         42,075         46,440         42,031         -4,049         -9.5%           9         Sunnyvale/Mountain View         40,871         42,735         51,287         46,340         -4,947         -9.6%           10         Saratoga/Cupertino         80,542         83,347         19,453         87,636         -4,478         -7.1%           20         Milpitze/Eax an Jose         51,382         55,256         71,910         67,547         -9,177         -8.8%           13         South San Jose/Almaden         55,033         57,032         63,514         59,036         -4,478         -7.1%           15         Livermore/Pleasanton		Mission District						
6         San Mateo/Rurlingame         49.832         51,721         56,485         57,702         4,783         -8.5%           7         Redwood City/Menlo Park         53,340         54,552         61,454         57,628         -3,826         -6.2%           8         Palo Alto/Los Altos         41,318         42,075         51,287         46,340         42,031         -4,409         -9.5%           10         Saratoga/Cupertino         80,542         83,447         91,453         87,606         -3,847         -4,28           11         Central San Jose         79,005         83,393         104,650         95,473         -9,177         -8.8%           13         South San Jose/Almaden         55,203         57,032         63,514         59,036         -4,478         -7,1%           14         Gilroy/Morgan Hill         22,699         25,641         35,388         25,920         -9,464         -26,8%           15         Livermore/Pleasanton         47,672         54,063         78,725         63,948         -14,777         -18,8%           16         Fremorl/Lnion City         72,259         75,408         89,205         77,160         -12,045         -13,5%           17         Hay	4	Sunset District				35,667		1.5%
6         San Mateo/Rurlingame         49.832         51,721         56,485         57,702         4,783         -8.5%           7         Redwood City/Menlo Park         53,340         54,552         61,454         57,628         -3,826         -6.2%           8         Palo Alto/Los Altos         41,318         42,075         51,287         46,340         42,031         -4,409         -9.5%           10         Saratoga/Cupertino         80,542         83,447         91,453         87,606         -3,847         -4,28           11         Central San Jose         79,005         83,393         104,650         95,473         -9,177         -8.8%           13         South San Jose/Almaden         55,203         57,032         63,514         59,036         -4,478         -7,1%           14         Gilroy/Morgan Hill         22,699         25,641         35,388         25,920         -9,464         -26,8%           15         Livermore/Pleasanton         47,672         54,063         78,725         63,948         -14,777         -18,8%           16         Fremorl/Lnion City         72,259         75,408         89,205         77,160         -12,045         -13,5%           17         Hay	5	Daly City/San Bruno	66,445	67,743	74,982	70,913	-4,069	-5.4%
7         Redwood City/Menio Park         53,340         54,552         61,454         57,628         -3,826         -6,2%           8         Palo Alto/Los Altos         41,318         42,075         46,440         42,031         -4,049         -9,5%           9         Sunnyvale/Mountain View         40,871         42,735         51,287         46,340         -4,947         -9,6%           10         Saratoga/Cupertino         80,542         83,447         191,453         87,606         -3,847         -4,28           11         Central San Jose/Almaden         55,203         57,032         63,514         59,036         -4,478         -7,1%           13         South San Jose/Almaden         76,72         54,063         78,725         63,948         -14,777         -18,8%           15         Livermore/Pleasanton         47,672         54,063         78,725         63,048         -10,35%           16         Fremont/Union City         72,259         75,408         89,023         100,537         97,559         -2,968         -3,05%           16         Fremont/Union City         72,259         75,408         89,023         100,537         97,559         -2,968         -3,05%           17					-			
9         Sunnyvale/Mountain View         40,871         42,735         51,287         46,340         -4,947         -9,6%           10         Saratoga/Cupertino         80,542         83,447         91,453         87,606         -3,847         -4,2%           11         Central San Jose         51,382         55,256         71,910         67,350         -4,550         -6,3%           12         Milpitas/East San Jose         79,005         83,393         104,650         95,473         -9,177         -8,8%           13         South San Jose/Almaden         55,220         57,032         63,514         59,036         -4,478         -7,15%           14         Gilroy/Morgan Hill         22,697         25,641         35,388         25,920         -9,468         -26,8%           15         Livermore/Pleasanton         47,672         54,063         78,725         63,948         -14,777         -18,8%           16         Fremont/Union City         72,259         75,408         89,205         77,160         -12,045         -13,5%           17         Hayward/San Leandro         81,530         89,623         100,537         97,569         -2,968         -3,0%           18         Oakland/Alameda								
10         Saratoga/Cupertino         80,542         83,447         91,453         87,606         -3,847         -4,2%           11         Central San Jose         51,382         55,256         71,910         67,350         -4,560         -6,3%           12         Milpitas/East San Jose         79,005         83,393         104,650         95,473         -9,177         -8.8%           13         South San Jose/Almaden         55,203         57,032         63,514         59,036         -4,478         -7,1%           14         Gilroy/Morgan Hill         22,699         25,641         35,388         25,920         -9,468         -26,8%           15         Livermore/Pleasanton         47,672         54,063         78,725         63,948         -14,777         -18,8%           16         Fremont/Union City         72,259         75,408         89,205         77,160         -12,045         -13,5%           17         Hayward/San Leandro         81,530         83,737         92,397         82,725         -9,672         -10,5%           18         Oakland/Alameda         88,180         89,623         10,537         97,569         -2,968         -3,0%           20         Richmond/El Cerrito	8	Palo Alto/Los Altos	41,318	42,075	46,440	42,031	-4,409	-9.5%
10       Saratoga/Cupertino       80,542       83,447       91,453       87,606       -3,847       -4,2%         11       Central San Jose       51,382       55,256       71,910       67,350       -4,560       -6,3%         12       Milpitas/East San Jose       79,005       83,393       104,650       95,473       -9,177       -8.8%         13       South San Jose/Almaden       55,203       57,032       63,514       59,036       -4,478       -7,1%         14       Gilroy/Morgan Hill       22,699       25,641       35,388       25,920       -9,468       -26,8%         15       Livermore/Pleasanton       47,672       54,063       78,725       63,948       -14,777       -18.8%         16       Fremont/Union City       72,259       75,408       89,205       77,160       -12,045       -13.5%         17       Hayward/San Leandro       81,530       83,737       92,397       82,725       -9,672       -10.5%         18       Oakland/Alameda       88,180       89,623       100,537       75,69       -2,968       -3.0%         20       Richmond/El Cerrito       61,083       63,238       74,534       76,330       1,796       2.4%	9	Sunnyvale/Mountain View	40,871	42,735	51,287	46,340	-4,947	-9.6%
11         Central San Jose         51,382         55,256         71,910         67,350         -4,560         -6.3%           12         Milpitax/East San Jose         79,005         83,393         104,650         95,473         -9,177         -8.8%           13         South San Jose/Almaden         55,203         57,032         63,514         59,036         -4,478         -7,1%           14         Gilroy/Morgan Hill         22,699         25,641         35,388         25,920         -9,468         -26,8%           15         Livermore/Pleasanton         47,672         54,063         78,725         63,948         -14,777         -18,8%           16         Fremort/Union City         72,259         75,408         89,205         77,160         -12,045         -13,5%           17         Hayward/San Leandro         81,530         83,737         92,397         82,725         -9,672         -10,5%           18         Oakland/Alameda         88,180         89,623         100,537         97,569         -2,968         -3,0%           20         Richmon/dE Cerrito         61,083         63,238         74,534         76,330         1,796         2,4%           21         Concord/Martinez	10					87,606	-3,847	-4.2%
12       Milpitas/East San Jose       79,005       83,393       104,650       95,473       -9,177       -8.8%         13       South San Jose       Almaden       55,203       57,032       63,514       59,036       -4,478       -7,18         14       Gilroy/Morgan Hill       22,699       25,641       35,388       25,920       -9,468       -26.8%         15       Livermore/Pleasanton       47,672       54,063       78,725       63,948       -14,777       -18.8%         16       Fremont/Union City       72,259       75,408       89,205       77,160       -12,045       -13.5%         18       Oaktand/Alameda       88,180       89,623       100,537       97,569       -2,968       -3.0%         19       Berkeley/Albany       32,546       32,824       35,284       31,638       -3,646       -10.3%         20       Richmond/El Cerrito       61,083       63,238       74,534       76,330       1,796       2.4%         21       Concord/Martinez       59,645       62,619       76,242       68,161       -8,081       -10.6%         22       Walut Creek/Lamorinda       40,225       41,413       47,336       56,019       8,683       18,3% <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td>								
13         South San Jose/Almaden         55,203         57,032         63,514         59,036         -4,478         -7.1%           14         Gilroy/Morgan Hill         22,699         25,641         35,388         25,920         -9,468         -26.8%           15         Livermore/Pleasanton         47,672         54,063         78,725         63,948         -14,777         -18.8%           16         Fremont/Union City         72,259         75,408         89,205         77,160         -12,045         -13.5%           17         Hayward/San Leandro         81,530         83,737         92,397         82,725         -9,672         -10.5%           19         Berkeley/Albany         32,546         32,824         35,284         31,638         -3,646         -10.3%           20         Richmond/El Cerrito         61,083         63,238         74,534         76,330         1,796         2,4%           21         Concord/Martinez         59,645         62,619         76,242         68,161         -8,081         -10.6%           22         Walnut Creek/Lamorinda         40,225         41,413         47,336         56,019         8,683         18.3%           24         Antoich/Pittsburg						95,473	-9,177	-8.8%
14         Gilroy/Morgan Hill         22,699         25,641         35,388         25,920         -9,468         -26,8%           15         Livermore/Pleasanton         47,672         54,063         78,725         63,948         -14,777         -18,8%           16         Fremont/Union City         72,259         75,408         89,205         77,160         -12,045         -13,5%           17         Hayward/San Leandro         81,530         83,737         92,397         82,725         -9,672         -0,678           18         Oakland/Alameda         88,180         89,623         100,537         97,569         -2,968         -3,0%           20         Richmond/El Cerrito         61,083         63,238         74,534         76,330         1,796         2,4%           21         Concord/Martinez         59,645         62,619         76,242         68,161         -8,081         18,3%           23         Danville/San Ramon         36,013         39,337         51,691         42,110         -9,581         -18,5%           24         Antioch/Pittsburg         59,376         66,147         89,722         69,732         -19,990         -22,3%           25         Vallejo/Benicia         37				57,032	63,514	59,036	-4,478	-7.1%
15         Livermore/Pleasanton         47,672         54,063         78,725         63,948         -14,777         -18.8%           16         Fremont/Union City         72,259         75,408         89,205         77,160         -12,045         -13,5%           17         Hayward/San Leandro         81,530         83,737         92,397         82,725         -9,672         -10,5%           18         Oakland/Alameda         88,180         89,623         100,537         97,569         -2,968         -3,0%           19         Berkeley/Albany         32,546         32,824         35,284         31,638         -3,646         -10,3%           20         Richmond/El Cerrito         61,083         63,238         74,534         76,330         1,796         2,4%           21         Concord/Martinez         59,645         62,619         76,242         68,161         -8,081         -10.6%           23         Danville/San Ramon         36,013         39,337         51,691         42,110         -9,581         -18,5%           24         Antioch/Pittsburg         59,376         66,147         89,722         69,732         -19,990         -22,1%           25         Vallejo/Benicia         37,7							-9,468	
16         Fremont/Union City         72,259         75,408         89,205         77,160         -12,045         -13,5%           17         Hayward/San Leandro         81,530         83,737         92,397         82,725         -9,672         -10,5%           18         Oakland/Alameda         88,180         89,623         100,537         97,569         -2,968         -3,0%           19         Berkeley/Albany         32,546         32,824         35,284         31,638         -3,646         -10,3%           20         Richmond/El Cerrito         61,083         63,238         74,534         76,330         1,796         2.4%           21         Concord/Martinez         59,645         62,619         76,242         68,161         -8,081         -10.6%           22         Walnut Creek/Lamorinda         40,225         41,413         47,336         56,019         8,683         18.3%           23         Danville/San Ramon         36,013         39,337         51,691         42,110         -9,581         -18.5%           24         Antioch/Pittsburg         59,376         66,147         89,722         69,732         -19,990         -22.1%           25         Vallejo/Benicia         37,71						63,948		
$\begin{array}{cccccccccccccccccccccccccccccccccccc$								
18         Oakland/Alameda         88,180         89,623         100,537         97,569         -2,968         -3.0%           19         Berkeley/Albany         32,546         32,824         35,284         31,638         -3,646         -10.3%           20         Richmond/El Cerrito         61,083         63,238         74,534         76,330         1,796         2.4%           21         Concord/Martinez         59,645         62,619         76,242         68,161         -8,081         -10.6%           22         Walnut Creek/Lamorinda         40,225         41,413         47,336         56,019         8,683         18.3%           23         Danville/San Ramon         36,013         39,337         51,691         42,110         -9,581         -18.5%           24         Antioch/Pittsburg         59,376         66,147         89,722         69,732         -19,990         -22.3%           25         Vallejo/Benicia         37,716         39,506         47,512         49,906         2,394         5.0%           26         Fairfield/Vacaville         61,885         70,014         97,496         75,980         -21,516         -22.1%           27         Napa         22,798 <t< td=""><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td></t<>								
19         Berkeley/Albany         32,546         32,824         35,284         31,638         -3,646         -10.3%           20         Richmond/El Cerrito         61,083         63,238         74,534         76,330         1,796         2.4%           21         Concord/Martinez         59,645         62,619         76,242         68,161         -8,081         -10.6%           22         Walnut Creek/Lamorinda         40,225         41,413         47,336         56,019         8,683         18.3%           23         Danville/San Ramon         36,013         39,337         51,691         42,110         -9,581         -18.5%           24         Antioch/Pittsburg         59,376         66,147         89,722         69,732         -19,990         -22.3%           25         Vallejo/Benicia         37,716         39,506         47,512         49,906         2,394         50.%           26         Fairfield/Vacaville         61,885         70,014         97,496         75,980         -21,516         -22.1%           27         Napa         22,798         24,487         29,637         30,159         522         1.8%           28         St. Helena/Calistoga         10,731 <t< td=""><td></td><td>/</td><td></td><td></td><td></td><td></td><td></td><td></td></t<>		/						
21       Concord/Martinez       59,645       62,619       76,242       68,161       -8,081       -10.6%         22       Walnut Creek/Lamorinda       40,225       41,413       47,336       56,019       8,683       18.3%         23       Danville/San Ramon       36,013       39,337       51,691       42,110       -9,581       -18.5%         24       Antioch/Pittsburg       59,376       66,147       89,722       69,732       -19,990       -22.3%         25       Vallejo/Benicia       37,716       39,506       47,512       49,906       2,394       5.0%         26       Fairfield/Vacaville       61,885       70,014       97,496       75,980       -21,516       -22.1%         27       Napa       22,798       24,487       29,637       30,159       522       1.8%         28       St. Helena/Calistoga       10,731       11,244       11,979       13,291       1,312       11.0%         29       Petaluma/Sonoma       45,531       48,705       53,921       54,002       81       0.2%         30       Santa Rosa/Sebastopol       60,239       63,754       74,068       74,160       92       0.1%         31       He								
21       Concord/Martinez       59,645       62,619       76,242       68,161       -8,081       -10.6%         22       Walnut Creek/Lamorinda       40,225       41,413       47,336       56,019       8,683       18.3%         23       Danville/San Ramon       36,013       39,337       51,691       42,110       -9,581       -18.5%         24       Antioch/Pittsburg       59,376       66,147       89,722       69,732       -19,990       -22.3%         25       Vallejo/Benicia       37,716       39,506       47,512       49,906       2,394       5.0%         26       Fairfield/Vacaville       61,885       70,014       97,496       75,980       -21,516       -22.1%         27       Napa       22,798       24,487       29,637       30,159       522       1.8%         28       St. Helena/Calistoga       10,731       11,244       11,979       13,291       1,312       11.0%         30       Santa Rosa/Sebastopol       60,239       63,754       74,068       74,160       92       0.1%         31       Healdsburg/Cloverdale       24,987       27,392       31,078       27,313       -3,765       -12.1%         32	20	Richmond/El Cerrito	61,083	63,238	74,534	76,330	1,796	2.4%
22         Walnut Creek/Lamorinda         40,225         41,413         47,336         56,019         8,683         18.3%           23         Danville/San Ramon         36,013         39,337         51,691         42,110         -9,581         -18.5%           24         Antioch/Pittsburg         59,376         66,147         89,722         69,732         -19,990         -22.3%           25         Vallejo/Benicia         37,716         39,506         47,512         49,906         2,394         5.0%           26         Fairfield/Vacaville         61,885         70,014         97,496         75,980         -21,516         -22.1%           27         Napa         22,798         24,487         29,637         30,159         522         1.8%           28         St. Helena/Calistoga         10,731         11,244         11,979         13,291         1,312         11.0%           29         Petaluma/Sonoma         45,531         48,705         53,921         54,002         81         0.2%           30         Santa Rosa/Sebastopol         60,239         63,754         74,068         74,160         92         0.1%           31         Healdsburg/Cloverdale         24,987         27		Concord/Martinez	59,645	62,619	76,242	68,161	-8,081	-10.6%
23         Danville/San Ramon         36,013         39,337         51,691         42,110         -9,581         -18.5%           24         Antioch/Pittsburg         59,376         66,147         89,722         69,732         -19,990         -22.3%           25         Vallejo/Benicia         37,716         39,506         47,512         49,906         2,394         5.0%           26         Fairfield/Vacaville         61,885         70,014         97,496         75,980         -21,516         -22.1%           27         Napa         22,798         24,487         29,637         30,159         522         1.8%           28         St. Helena/Calistoga         10,731         11,244         11,979         13,291         1,312         11.0%           29         Petaluma/Sonoma         45,531         48,705         53,921         54,002         81         0.2%           30         Santa Rosa/Sebastopol         60,239         63,754         74,068         74,160         92         0.1%           31         Healdsburg/Cloverdale         24,987         27,392         31,078         27,313         -3,765         -12.1%           32         Novato         15,842         16,255		Walnut Creek/Lamorinda		41,413		56,019	8,683	18.3%
$\begin{array}{c c c c c c c c c c c c c c c c c c c $						42,110	-9,581	-18.5%
$\begin{array}{c c c c c c c c c c c c c c c c c c c $		Antioch/Pittsburg		66,147		69,732	-19,990	-22.3%
$\begin{array}{c c c c c c c c c c c c c c c c c c c $	25	Vallejo/Benicia	37,716	39,506	47,512	49,906	2,394	5.0%
28St. Helena/Calistoga10,73111,24411,97913,2911,31211.0%29Petaluma/Sonoma45,53148,70553,92154,002810.2%30Santa Rosa/Sebastopol60,23963,75474,06874,160920.1%31Healdsburg/Cloverdale24,98727,39231,07827,313-3,765-12.1%32Novato15,84216,25519,38618,941-445-2.3%33San Rafael28,31628,69430,61629,211-1,405-4.6%34Mill Valley/Sausalito25,08125,45127,95126,463-1,488-5.3%Bay Area1,560,0211,636,8201,934,9741,783,435-151,539-7.8%San Francisco107,729109,314118,094114,618-3,476-2.9%San Mateo169,617174,016192,921180,243-12,678-6.6%Santa Clara371,020389,579464,642423,756-40,886-8.8%Alameda322,187335,655396,148353,040-43,108-10.9%Contra Costa256,342272,754339,525312,352-27,173-8.0%Solano99,601109,520145,008125,886-19,122-13.2%Napa33,52935,73141,61643,4501,8344.4%	26	Fairfield/Vacaville	61,885	70,014	97,496	75,980	-21,516	-22.1%
29         Petaluma/Sonoma         45,531         48,705         53,921         54,002         81         0.2%           30         Santa Rosa/Sebastopol         60,239         63,754         74,068         74,160         92         0.1%           31         Healdsburg/Cloverdale         24,987         27,392         31,078         27,313         -3,765         -12.1%           32         Novato         15,842         16,255         19,386         18,941         -445         -2.3%           33         San Rafael         28,316         28,694         30,616         29,211         -1,405         -4.6%           34         Mill Valley/Sausalito         25,081         25,451         27,951         26,463         -1,488         -5.3%           Bay Area         1,560,021         1,636,820         1,934,974         1,783,435         -151,539         -7.8%           San Francisco         107,729         109,314         118,094         114,618         -3,476         -2.9%           Santa Clara         371,020         389,579         464,642         423,756         40,886         -8.8%           Alameda         322,187         335,655         396,148         353,040         -43,108	27	Napa	22,798	24,487	29,637	30,159	522	1.8%
30         Santa Rosa/Sebastopol         60,239         63,754         74,068         74,160         92         0.1%           31         Healdsburg/Cloverdale         24,987         27,392         31,078         27,313         -3,765         -12.1%           32         Novato         15,842         16,255         19,386         18,941         -445         -2.3%           33         San Rafael         28,316         28,694         30,616         29,211         -1,405         -4.6%           34         Mill Valley/Sausalito         25,081         25,451         27,951         26,463         -1,488         -5.3%           Bay Area         1,560,021         1,636,820         1,934,974         1,783,435         -151,539         -7.8%           San Francisco         107,729         109,314         118,094         114,618         -3,476         -2.9%           Santa Clara         371,020         389,579         464,642         423,756         -40,886         -8.8%           Alameda         322,187         335,655         396,148         353,040         -43,108         -10.9%           Contra Costa         256,342         272,754         339,525         312,352         -27,173         -8.0% </td <td>28</td> <td>St. Helena/Calistoga</td> <td>10,731</td> <td>11,244</td> <td>11,979</td> <td>13,291</td> <td>1,312</td> <td>11.0%</td>	28	St. Helena/Calistoga	10,731	11,244	11,979	13,291	1,312	11.0%
31         Healdsburg/Cloverdale         24,987         27,392         31,078         27,313         -3,765         -12.1%           32         Novato         15,842         16,255         19,386         18,941         -445         -2.3%           33         San Rafael         28,316         28,694         30,616         29,211         -1,405         -4.6%           34         Mill Valley/Sausalito         25,081         25,451         27,951         26,463         -1,488         -5.3%           Bay Area         1,560,021         1,636,820         1,934,974         1,783,435         -151,539         -7.8%           San Francisco         107,729         109,314         118,094         114,618         -3,476         -2.9%           San Mateo         169,617         174,016         192,921         180,243         -12,678         -6.6%           Santa Clara         371,020         389,579         464,642         423,756         -40,886         -8.8%           Alameda         322,187         335,655         396,148         353,040         -43,108         -10.9%           Contra Costa         256,342         272,754         339,525         312,352         -27,173         -8.0%	29	Petaluma/Sonoma	45,531	48,705	53,921	54,002	81	0.2%
32         Novato         15,842         16,255         19,386         18,941         -445         -2.3%           33         San Rafael         28,316         28,694         30,616         29,211         -1,405         -4.6%           34         Mill Valley/Sausalito         25,081         25,451         27,951         26,463         -1,488         -5.3%           Bay Area         1,560,021         1,636,820         1,934,974         1,783,435         -151,539         -7.8%           San Francisco         107,729         109,314         118,094         114,618         -3,476         -2.9%           San Mateo         169,617         174,016         192,921         180,243         -12,678         -6.6%           Santa Clara         371,020         389,579         464,642         423,756         -40,886         -8.8%           Alameda         322,187         335,655         396,148         353,040         -43,108         -10.9%           Contra Costa         256,342         272,754         339,525         312,352         -27,173         -8.0%           Solano         99,601         109,520         145,008         125,886         -19,122         -13.2%           Napa	30	Santa Rosa/Sebastopol	60,239	63,754	74,068	74,160	92	0.1%
33         San Rafael         28,316         28,694         30,616         29,211         -1,405         -4.6%           34         Mill Valley/Sausalito         25,081         25,451         27,951         26,463         -1,488         -5.3%           Bay Area         1,560,021         1,636,820         1,934,974         1,783,435         -151,539         -7.8%           San Francisco         107,729         109,314         118,094         114,618         -3,476         -2.9%           San Mateo         169,617         174,016         192,921         180,243         -12,678         -6.6%           Santa Clara         371,020         389,579         464,642         423,756         -40,886         -8.8%           Alameda         322,187         335,655         396,148         353,040         -43,108         -10.9%           Contra Costa         256,342         272,754         339,525         312,352         -27,173         -8.0%           Solano         99,601         109,520         145,008         125,886         -19,122         -13.2%           Napa         33,529         35,731         41,616         43,450         1,834         4.4%	31	Healdsburg/Cloverdale	24,987	27,392	31,078	27,313	-3,765	-12.1%
34Mill Valley/Sausalito25,08125,45127,95126,463-1,488-5.3%Bay Area1,560,0211,636,8201,934,9741,783,435-151,539-7.8%San Francisco107,729109,314118,094114,618-3,476-2.9%San Mateo169,617174,016192,921180,243-12,678-6.6%Santa Clara371,020389,579464,642423,756-40,886-8.8%Alameda322,187335,655396,148353,040-43,108-10.9%Contra Costa256,342272,754339,525312,352-27,173-8.0%Solano99,601109,520145,008125,886-19,122-13.2%Napa33,52935,73141,61643,4501,8344.4%	32	Novato	15,842	16,255		18,941	-445	-2.3%
Bay Area1,560,0211,636,8201,934,9741,783,435-151,539-7.8%San Francisco107,729109,314118,094114,618-3,476-2.9%San Mateo169,617174,016192,921180,243-12,678-6.6%Santa Clara371,020389,579464,642423,756-40,886-8.8%Alameda322,187335,655396,148353,040-43,108-10.9%Contra Costa256,342272,754339,525312,352-27,173-8.0%Solano99,601109,520145,008125,886-19,122-13.2%Napa33,52935,73141,61643,4501,8344.4%	33	San Rafael	28,316	28,694	30,616	29,211	-1,405	-4.6%
San Francisco107,729109,314118,094114,618-3,476-2.9%San Mateo169,617174,016192,921180,243-12,678-6.6%Santa Clara371,020389,579464,642423,756-40,886-8.8%Alameda322,187335,655396,148353,040-43,108-10.9%Contra Costa256,342272,754339,525312,352-27,173-8.0%Solano99,601109,520145,008125,886-19,122-13.2%Napa33,52935,73141,61643,4501,8344.4%	34	Mill Valley/Sausalito	25,081	25,451	27,951	26,463	-1,488	-5.3%
San Mateo169,617174,016192,921180,243-12,678-6.6%Santa Clara371,020389,579464,642423,756-40,886-8.8%Alameda322,187335,655396,148353,040-43,108-10.9%Contra Costa256,342272,754339,525312,352-27,173-8.0%Solano99,601109,520145,008125,886-19,122-13.2%Napa33,52935,73141,61643,4501,8344.4%		Bay Area	1,560,021	1,636,820	1,934,974	1,783,435	-151,539	-7.8%
Santa Clara371,020389,579464,642423,756-40,886-8.8%Alameda322,187335,655396,148353,040-43,108-10.9%Contra Costa256,342272,754339,525312,352-27,173-8.0%Solano99,601109,520145,008125,886-19,122-13.2%Napa33,52935,73141,61643,4501,8344.4%								
Alameda322,187335,655396,148353,040-43,108-10.9%Contra Costa256,342272,754339,525312,352-27,173-8.0%Solano99,601109,520145,008125,886-19,122-13.2%Napa33,52935,73141,61643,4501,8344.4%		San Mateo						
Contra Costa256,342272,754339,525312,352-27,173-8.0%Solano99,601109,520145,008125,886-19,122-13.2%Napa33,52935,73141,61643,4501,8344.4%		Santa Clara		389,579				
Solano99,601109,520145,008125,886-19,122-13.2%Napa33,52935,73141,61643,4501,8344.4%		Alameda	322,187				-43,108	
Napa 33,529 35,731 41,616 43,450 1,834 4.4%		Contra Costa						
		Solano		•				
Sonoma 130 757 139 851 159 067 155 475 -3 592 -2 3%		Napa						
		Sonoma	130,757	139,851	159,067	155,475	-3,592	-2.3%
Marin 69,239 70,400 77,953 74,615 -3,338 -4.3%		Marin	69,239	70,400	77,953	74,615	-3,338	-4.3%

Table D-I I: Compare Multi-Family Households by MTC 34 Superdistrict & County, 2000-
2030 ABAG Projections 2003 & TRANSDEF Smart Growth Alternative

	V ADAG Projections 2003				TRANSDEF		Percent
	Superdistrict	2000	2005	2030	2030	Difference	Difference
1	Downtown San Francisco	65,893	68,175	88,479	93,407	4,928	5.6%
2	Richmond District	85,082	86,457	97,667	101,746	4,079	4.2%
3	Mission District	55,134	56,646	80,620	89,436	8,816	10.9%
4	Sunset District	15,859	16,059	17,734	19,167	1,433	8.1%
5	Daly City/San Bruno	29,926	30,613	37,200	42,673	5,473	14.7%
6	San Mateo/Burlingame	30,568	31,667	37,669	43,483	5,814	15.4%
7	Redwood City/Menlo Park	23,993	24,655	33,222	42,605	9,383	28.2%
8	Palo Alto/Los Altos	26,750	27,658	36,575	39,552	2,977	8.1%
9	Sunnyvale/Mountain View	47,808	50,740	78,359	87,260	8,901	11.4%
10	Saratoga/Cupertino	36,300	37,428	43,127	45,596	2,469	5.7%
11	Central San Jose	40,667	45,520	83,142	97,547	14,405	17.3%
12	Milpitas/East San Jose	20,415	21,680	31,858	35,176	3,318	10.4%
13	South San Jose/Almaden	16,117	16,605	19,449	20,415	966	5.0%
14	Gilroy/Morgan Hill	6,785	7,533	10,893	10,172	-721	-6.6%
15	Livermore/Pleasanton	12,815	14,450	22,735	23,184	449	2.0%
16	Fremont/Union City	27,251	28,193	37,039	37,548	509	1.4%
17	Hayward/San Leandro	41,080	42,368	52,623	53,744	1,121	2.1%
18	Oakland/Alameda	83,869	85,913	121,305	126,727	5,422	4.5%
19	Berkeley/Albany	36,163	36,815	46,072	41,853	-4,219	-9.2%
20	Richmond/El Cerrito	24,409	25,478	32,143	38,841	6,698	20.8%
21	Concord/Martinez	24,182	25,123	31,597	33,041	1,444	4.6%
22	Walnut Creek/Lamorinda	18,885	19,423	23,769	36,682	12,913	54.3%
23	Danville/San Ramon	5,458	5,967	9,748	9,678	-70	-0.7%
24	Antioch/Pittsburg	14,853	16,166	23,102	18,891	-4,211	-18.2%
25	Vallejo/Benicia	13,245	14,222	19,964	34,940	14,976	75.0%
26	Fairfield/Vacaville	17,557	19,434	28,398	24,519	-3,879	-13.7%
27	Napa	8,411	9,120	11,691	17,019	5,328	45.6%
28	St. Helena/Calistoga	3,462	3,590	3,925	5,676	1,751	44.6%
29	Petaluma/Sonoma	14,917	16,083	18,422	22,078	3,656	19.8%
30	Santa Rosa/Sebastopol	22,199	23,347	29,429	38,571	9,142	31.1%
31	Healdsburg/Cloverdale	4,530	5,110	6,239	5,288	-951	-15.2%
32	Novato	5,334	5,611	7,345	8,009	664	9.0%
33	San Rafael	13,211	13,614	15,286	19,653	4,367	28.6%
34	Mill Valley/Sausalito	12,866	13,064	14,792	15,424	632	4.3%
	Bay Area	905,994	944,527	1,251,618	1,379,601	127,983	10.2%
	San Francisco	221,968	227,337	284,500	303,756	19,256	6.8%
	San Mateo	84,487	86,935	108,091	128,761	20,670	19.1%
	Santa Clara	194,842	207,164	303,403	335,718	32,315	10.7%
	Alameda	201,178	207,739	279,774	283,056	3,282	1.2%
	Contra Costa	87,787	92,157	120,359	137,133	16,774	13.9%
	Solano	30,802	33,656	48,362	59,459	11,097	22.9%
	Napa	11,873	12,710	15,616	22,695	7,079	45.3%
	Sonoma	41,646	44,540	54,090	65,937	11,847	21.9%
	Marin	31,411	32,289	37,423	43,086	5,663	15.1%

		ABAG	Projections 200	)3	TRANSDEF		Percent
		2000	2005	2030	2030	Difference	Difference
1	Downtown San Francisco	40,154	41,433	52,702	70,794	18,092	34.3%
2	Richmond District	23,892	23,165	26,308	33,103	6,795	25.8%
3	Mission District	20,814	20,306	29,455	37,903	8,448	28.7%
4	Sunset District	6,165	6,061	5,891	6,091	200	3.4%
5	Daly City/San Bruno	6,660	4,466	6,168	7,173	1,005	16.3%
6	San Mateo/Burlingame	4,628	3,290	4,153	6,035	1,882	45.3%
7	Redwood City/Menlo Park	4,832	3,533	5,460	9,946	4,486	82.2%
8	Palo Alto/Los Altos	3,935	3,469	4,337	5,837	1,500	34.6%
9	Sunnyvale/Mountain View	4,989	4,913	8,558	10,205	1,647	19.2%
10	Saratoga/Cupertino	5,375	4,725	4,701	5,417	716	15.2%
11	Central San Jose	8,566	10,314	19,439	26,763	7,324	37.7%
12	Milpitas/East San Jose	5,488	5,420	7,506	8,779	1,273	17.0%
13	South San Jose/Almaden	3,041	2,546	2,704	3,264	560	20.7%
14	Gilroy/Morgan Hill	1,449	1,350	1,568	1,563	-5	-0.3%
15	Livermore/Pleasanton	2,043	1,823	2,481	9,236	6,755	272.3%
16	Fremont/Union City	4,646	4,069	5,534	8,561	3,027	54.7%
17	Hayward/San Leandro	9,669	9,835	11,740	12,497	757	6.4%
18	Oakland/Alameda	30,825	32,747	48,447	56,904	8,457	17.5%
19	Berkeley/Albany	10,969	11,153	12,410	13,059	649	5.2%
20	Richmond/El Cerrito	8,659	8,882	8,994	13,310	4,316	48.0%
21	Concord/Martinez	5,719	5,978	6,567	7,664	1,097	16.7%
22	Walnut Creek/Lamorinda	3,397	3,309	4,024	8,883	4,859	120.8%
23	Danville/San Ramon	924	885	2,050	5,355	3,305	161.29
24	Antioch/Pittsburg	4,290	4,241	4,974	4,952	-22	-0.49
25	Vallejo/Benicia	3,981	4,107	5,381	16,378	10,997	204.49
26	Fairfield/Vacaville	4,453	4,729	5,886	7,897	2,011	34.29
27	Napa	2,074	1,964	2,045	5,485	3, <del>44</del> 0	168.29
28	St. Helena/Calistoga	633	521	417	713	296	71.09
29	Petaluma/Sonoma	3,382	2,681	1,918	3,504	1,586	82.7%
30	Santa Rosa/Sebastopol	5,093	4,679	4,003	10,275	6,272	156.7%
31	Healdsburg/Cloverdale	1,403	1,396	1,302	1,924	622	47.89
32	Novato	1,072	1,075	893	1,257	364	40.89
33	San Rafael	2,462	2,412	2,214	3,456	1,242	56.19
34	Mill Valley/Sausalito	1,550	1,187	1,139	1,245	106	9.39
	Bay Area	247,232	242,664	311,369	425,428	114,059	36.69
	San Francisco	91,025	90,965	114,356	147,891	33,535	29.39
	San Mateo	16,120	11,289	15,781	23,154	7,373	46.79
	Santa Clara	32,843	32,737	48,813	61,828	13,015	26.79
	Alameda	58,152	59,627	80,612	100,257	19,645	24.49
	Contra Costa	22,989	23,295	26,609	40,164	13,555	50.99
	Solano	8,434	8,836	11,267	24,275	13,008	115.55
	Napa	2,707	2,485	2,462	6,198	3,736	151.79
	Sonoma	9,878	8,756	7,223	15,703	8,480	117.49
	Marin	5,084	4,674	4,246	5,958	1,712	40.35

# Table D-12: Compare Zero-Vehicle Households by MTC 34 Superdistrict & County, 2000-2030 ABAG Projections 2003 & TRANSDEF Smart Growth Alternative

Table D-13: Compare Total Household Vehicles by MTC 34 Superdistrict & County, 2000-2030 ABAG
Projections 2003 & TRANSDEF Smart Growth Alternative

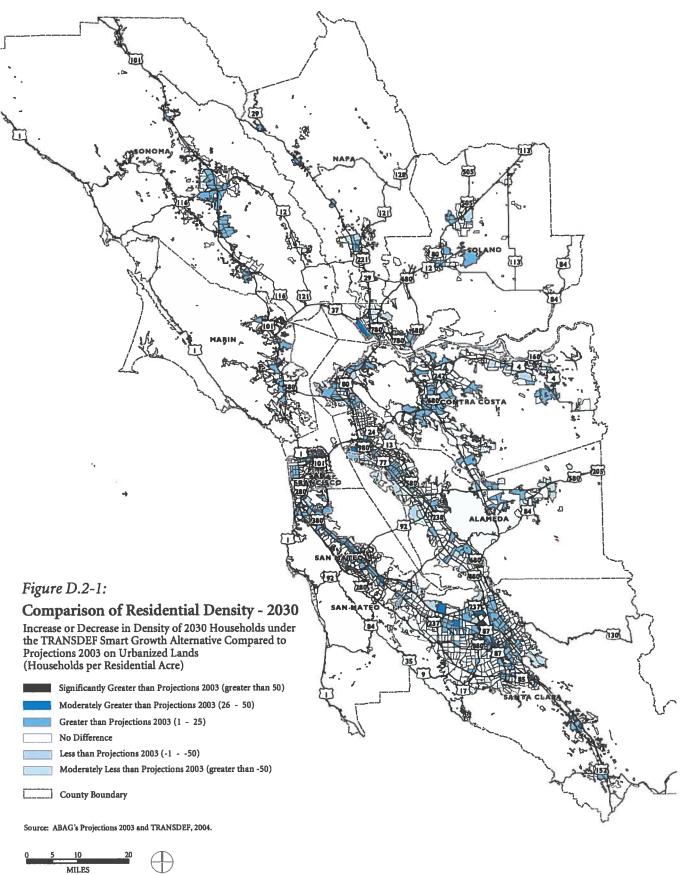
110		ABAG Projections 2003			TRANSDEF Percent		
	Superdistrict	2000	2005	2030	2030	Difference	Difference
1	Downtown San Francisco	35,362	37,509	50,396	47,140	-3,256	-6.5%
2	Richmond District	114,724	120,969	126,299	114,485	-11,814	-9.4%
3	Mission District	147,744	155,719	195,446	211,350	15,904	8.1%
4	Sunset District	73,335	75,191	82,300	85,376	3,076	3.7%
5	Daly City/San Bruno	180,808	201,192	221,872	219,334	-2,538	-1.1%
6	San Mateo/Burlingame	146,593	164,268	180,086	172,581	-7,505	-4.2%
7	Redwood City/Menlo Park	148,070	162,338	186,277	180,481	-5,796	-3.1%
8	Palo Alto/Los Altos	122,940	131,170	152,806	144,979	-7,828	-5.1%
9	Sunnyvale/Mountain View	155,075	167,011	220,802	217,857	-2,945	-1.3%
10	Saratoga/Cupertino	228,126	244,545	272,990	266,058	-6,931	-2.5%
11	Central San Jose	164,153	179,354	265,265	264,938	-327	-0.1%
12	Milpitas/East San Jose	225,007	242,385	311,508	290,522	-20,986	-6.7%
13	South San Jose/Almaden	150,499	161,058	180,767	169,926	-10,841	-6.0%
14	Gilroy/Morgan Hill	63,309	73,917	104,621	80,437	-24,184	-23.1%
15	Livermore/Pleasanton	123,239	144,141	214,092	152,937	-61,155	-28.6%
16	Fremont/Union City	204,543	220,604	264,570	226,522	-38,048	-14.4%
17	Hayward/San Leandro	223,274	232,689	267,373	246,552	-20,821	-7.8%
18	Oakland/Alameda	239,824	244,465	296,768	284,232	-12,536	-4.2%
19	Berkeley/Albany	91,977	94,301	111,667	96,756	-14,911	-13.4%
20	Richmond/El Cerrito	146,378	153,203	191,150	194,704	3,555	1.9%
21	Concord/Martinez	155,209	163,259	203,787	184,787	-19,000	-9.3%
22	Walnut Creek/Lamorinda	106,396	111,961	129,343	157,111	27,768	21.5%
23	Danville/San Ramon	88,840	99,183	126,831	97,416	-29,414	-23.2%
24	Antioch/Pittsburg	146,811	167,049	234,184	177,697	-56,487	-24.1%
25	Vallejo/Benicia	95,633	103,263	129,850	134,289	4,438	3.4%
_26	Fairfield/Vacaville	157,557	180,717	259,280	196,067	-63,213	24.4%
27	Napa	57,575	64,336	81,274	82,010	735	0.9%
28	St. Helena/Calistoga	27,301	30,053	33,394	38,376	4,982	14.9%
29	Petaluma/Sonoma	116,241	131,630	152,901	153,535	634	0.4%
30	Santa Rosa/Sebastopol	152,409	166,167	207,290	208,618	1,328	0.6%
31	Healdsburg/Cloverdale	57,179	64,628	76,408	62,344	-14,064	-18.4%
32	Novato	40,088	41,458	52,893	51,194	-1,699	-3.2%
33	San Rafael	73,168	75,292	83,769	84,558	788	0.9%
34	Mill Valley/Sausalito	65,598	70,104	78,430	75,955	-2,475	-3.2%
	Bay Area	4,324,985	4,675,130	5,746,689	5,371,124	-375,565	-6.5%
	San Francisco	371,165	389,388	454,441	458,351	3,910	0.9%
	San Mateo	475,472	527,7 <b>9</b> 8	588,235	572,396	-15,839	-2.7%
	Santa Clara	1,109,108	1,199,439	1,508,759	1,434,716	-74,042	-4.9%
	Alameda	882,858	936,200	1,154,471	1,006,999	-147,471	-12.8%
	Contra Costa	643,634	694,655	885,294	811,716	-73,578	-8.3%
	Solano	253,190	283,980	389,130	330,356	-58,775	-15.1%
	Napa	84,876	94,389	114,668	120,385	5,717	5.0%
	Sonoma	325,829	362,425	436,599	424,497	-12,102	-2.8%
<u></u>	Marin	178,853	186,855	215,092	211,706	-3,386	-1.6%

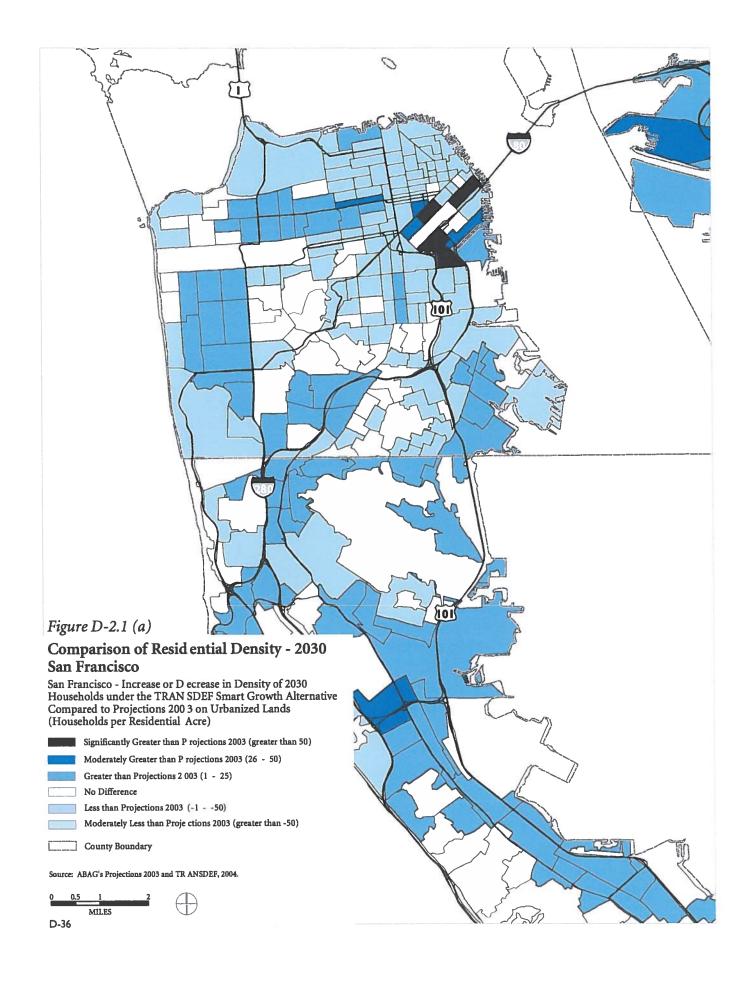
# Table D-I 4: Compare Average Vehicles per Household by MTC 34 Superdistrict & County, 2000-2030 ABAG Projections 2003 & TRANSDEF Smart Growth Alternative

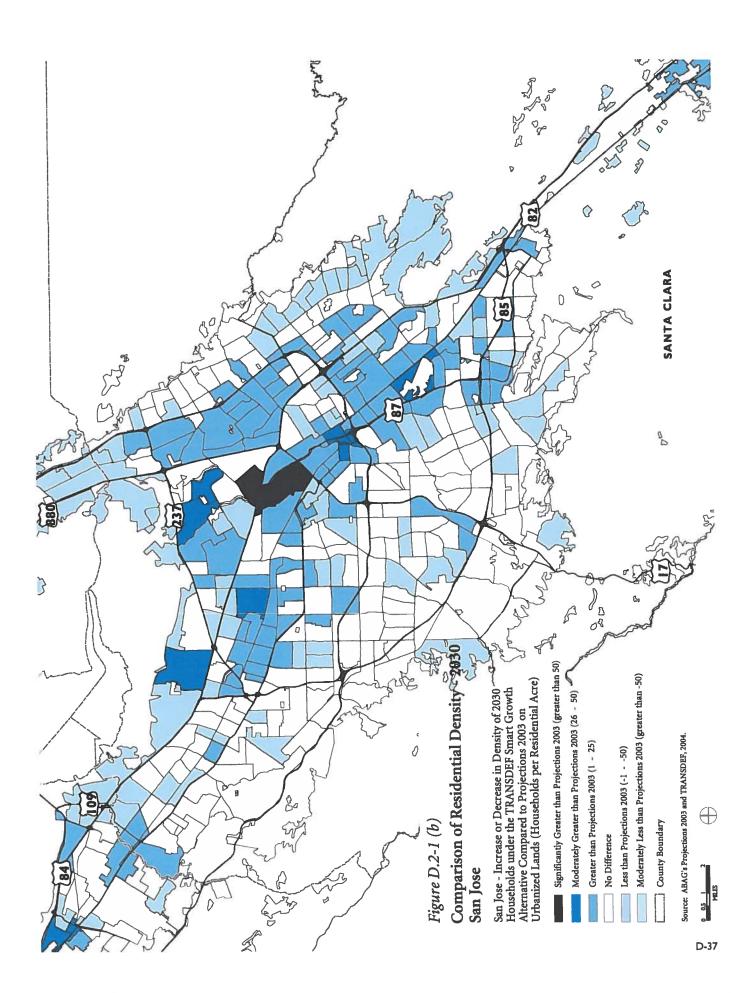
2-3162	ABAG Projections 2003 & TRANSDER Smart Growth Alternative ABAG Projections 2003			TRANSDEF		Percent	
	Superdistrict	2000	2005	2030	2030	Difference	Difference
1	Downtown San Francisco	0.52	0.53	0.55	0.44	-0.12	-21.0%
2	Richmond District	1.12	1.17	1.13	1.01	-0.12	-10.6%
3	Mission District	1.34	1.38	1.33	1.27	-0.06	-4.5%
4	Sunset District	1.50	1.52	1.56	1.56	0.00	0.1%
5	Daly City/San Bruno	1.88	2.05	1.98	1.93	-0.05	-2.4%
6	San Mateo/Burlingame	1.82	1.97	1.91	1.8	-0.10	-5.2%
7	Redwood City/Menlo Park	1.91	2.05	1.97		-0.17	-8.5%
8	Palo Alto/Los Altos	1.81	1.88	1.84	1.77	-0.07	-3.9%
9	Sunnyvale/Mountain View	1.75	1.79	1.70	1.6	-0.05	-3.0%
10	Saratoga/Cupertino	1.95	2.02	2.03	2.00	-0.03	-1.5%
11	Central San Jose	1.78	1.78	1.71	1.6	-0.10	-6.1%
12	Milpitas/East San Jose	2.26	2.31	2.28		-0.06	-2.5%
13	South San Jose/Almaden	2.11	2.19	2.18	2.14	-0.04	-1.8%
14	Gilroy/Morgan Hill	2.15	2.23	2.26		-0.03	-1.4%
15	Livermore/Pleasanton	2.04	2.10	2.11			-16.8%
16	Fremont/Union City	2.06	2.13	2.10			-6.4%
17	Hayward/San Leandro	1.82	1.85	1.84			-2.0%
18	Oakland/Alameda	1.39	1.39	1.34			-5.6%
19	Berkeley/Albany	1.34	1.35	1.37			-3.6%
20	Richmond/El Cerrito	1.71	1.73	1.79			-5.7%
21	Concord/Martinez	1.85	1.86	1.89			-3.4%
22	Walnut Creek/Lamorinda	1.80	1.84	1.82			-6.8%
23	Danville/San Ramon	2.14	2.19	2.06			-8.9%
24	Antioch/Pittsburg	1.98	2.03	2.08			-3.4%
25	Vallejo/Benicia	1.88	1.92	1.92			-17.8%
26	Fairfield/Vacaville	1.98	2.02	2.00			-5.3%
27	Napa	1.84	1.91	1.97			-11.6%
28	St. Helena/Calistoga	1.92	2.03	2.10			-3.6%
29	Petaluma/Sonoma	1.92	2.03	2.1			-4.5%
30	Santa Rosa/Sebastopol	1.85	1.91	2.00			-7.6%
31	Healdsburg/Cloverdale	1.00	1.99	2.0			-6.6%
32	Novato	1.89	1.90	1.9	the second s		-4.0%
33	San Rafael	1.76	1.78	1.8			
34	Mill Valley/Sausalito	1.73	1.82	1.8			-1.2%
	Bay Area	1.75	1.81	1.8			-6.5%
	San Francisco	1.13	1.16	1.1	and the second diversity of the second		
	San Mateo	1.87	2.02	1.9			
	Santa Clara	1.96	2.01	1.9			
	Alameda	1.69	1.72	1.7			
	Contra Costa	1.87	1.90				
	Solano	1.94	1.98				
	Napa	1.87	1.95				
	Sonoma	1.89	1.97				
	Marin	1.78	1.82				
	1 103 131	1.70	1.02	1.0	- 1.6	-0.07	

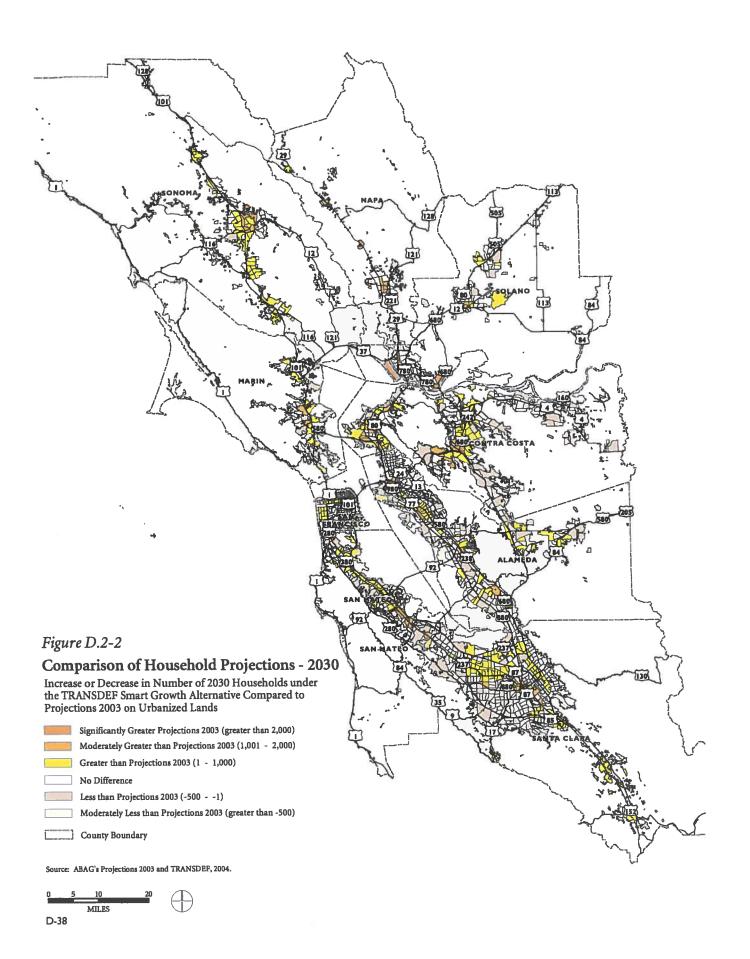
# Table D-15: Compare Share of Zero-Vehicle of Total Households by MTC 34 Superdistrict & County, 2000-2030 ABAG Projections 2003 & TRANSDEF Smart Growth Alternative

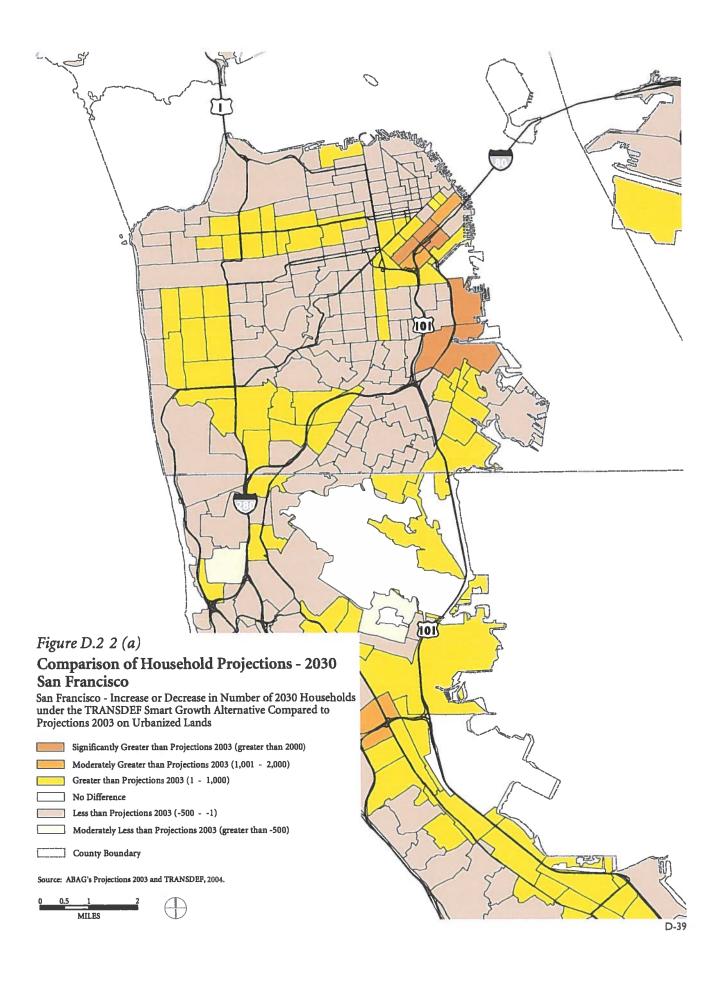
I         Downtown San Francisco         58.9%         58.8%         58.0%         65.9%         7.8%         12           2         Richmond District         23.4%         22.3%         23.5%         29.1%         5.7%         22           3         Mission District         18.8%         18.0%         20.1%         22.8%         2.7%         12           4         Sunset District         12.6%         12.2%         11.1%         11.1%         0.0%         -4           5         Daly City/San Bruno         6.9%         4.5%         5.5%         6.3%         0.8%         14           6         San Mateo/Burlingame         5.8%         3.9%         4.4%         6.3%         1.9%         44           7         Redwood City/Menio Park         6.2%         4.5%         5.8%         6.3%         1.9%         44           7         Redwood City/Menio Park         6.2%         5.3%         6.6%         7.7%         1.1%         11           10         Saratog/Cupertino         4.6%         3.9%         3.5%         3.3%         4.1%         0.6%         1.2%         22           11         Miptas/East San Jose         5.5%         5.2%         5.7%		ABAG Projections 2003			TRANSDEF Percei			
2         Richmond District         23.4%         22.3%         23.5%         29.1%         5.7%         22           3         Mission District         18.8%         18.0%         20.1%         22.8%         2.7%         12           4         Sunset District         12.6%         12.2%         11.1%         11.1%         0.0%         -4           5         Daly City/San Bruno         6.9%         4.5%         5.5%         6.3%         0.8%         14           6         San Mateo/Burlingame         5.8%         3.9%         4.4%         6.3%         1.9%         43           7         Redwood City/Menio Park         6.2%         4.5%         5.8%         9.9%         4.2%         77           8         Palo Alto/Los Altos         5.8%         5.0%         5.2%         7.1%         1.9%         31           10         Saratog/Cupertino         4.6%         3.9%         4.1%         0.6%         7.7%         1.1%         17           11         Central San Jose         5.5%         5.2%         5.7%         6.7%         1.2%         22           20         Miliptas/East San Jose         5.5%         5.2%         6.7%         1.2%         22<		Superdistrict	2000	2005	2030	2030	Difference	Difference
3         Mission District         18.8%         18.0%         20.1%         22.8%         2.7%         13           4         Sunset District         12.6%         12.2%         11.1%         0.0%         -4           5         Daly CitySan Bruno         6.9%         4.5%         5.5%         6.3%         0.8%         14           6         San Mateo/Burlingame         5.8%         3.9%         4.4%         6.3%         1.9%         44           7         Redwood City/Nenlo Park         6.2%         4.5%         5.8%         9.9%         4.2%         77           8         Palo Alto/Los Altos         5.8%         5.0%         5.2%         7.1%         1.1%         17           10         Saratoga/Cupertino         4.6%         3.9%         3.5%         4.1%         0.6%         12%         22           11         Central San Jose         5.5%         5.2%         5.5%         6.7%         1.2%         22         13         South San Jose/Almaden         4.3%         3.5%         4.1%         0.4%         4.3%         0.9%         2         12         Gitro/Morgan Hill         4.9%         1.1%         1.2%         22         13         South San Jose/Almade		Downtown San Francisco	58.9%					13.5%
4Sunset District12.6%12.2%11.1%11.1%0.0%-45Daly City/San Bruno6.9%4.5%5.5%6.3%0.08%16San Maeo/Burlingame5.8%3.9%4.4%6.3%0.9%4.2%7/7Redwood City/Henlo Park6.2%4.5%5.8%9.9%4.2%7/8Palo Alto/Los Altos5.8%5.0%5.2%7.1%1.9%339Sunnyale/Mountain View5.6%5.3%6.6%7.7%1.1%1110Saratoga/Cupertino4.6%3.9%3.5%4.1%0.6%1411Central San Jose9.3%10.2%12.5%16.2%3.7%2212Milpitas/East San Jose5.5%5.2%5.5%6.7%1.2%2213South San Jose/Almaden4.3%3.5%3.3%4.1%0.8%2414Gilroy/Morgan Hill4.9%4.1%3.4%4.3%0.9%2215Livermore/Pleasanton3.4%2.7%2.4%10.6%8.2%3316Fremoru/Union City4.7%3.0%6617Hayward/San Leandro7.9%7.9%7.9%8.1%9.2%1.1%1118Oakland/Alameda17.9%18.7%2.1.8%2.5.3%3.5%111821Concord/Martinez6.8%6.8%6.1%7.6%1.5%220Walnut Creek/Lamorinda5.7%5.4% </td <td>2</td> <td>Richmond District</td> <td>23.4%</td> <td>22.3%</td> <td></td> <td>29.1%</td> <td></td> <td>24.1%</td>	2	Richmond District	23.4%	22.3%		29.1%		24.1%
5         Daly City/San Bruno         6.9%         4.5%         5.5%         6.3%         0.8%         14           6         San Mateo/Burlingame         5.8%         3.9%         4.4%         6.3%         1.9%         44           7         Redwood City/Menlo Park         6.2%         4.5%         5.8%         9.9%         4.2%         77           8         Palo Alto/Los Altos         5.8%         5.0%         5.2%         7.1%         1.9%         34           9         Sunnyvale/Hountain View         5.6%         5.3%         6.6%         7.7%         1.1%         10           10         Saratoga/Cupertino         4.6%         3.9%         3.5%         4.1%         0.6%         11           11         Central San Jose         5.5%         5.2%         5.5%         6.7%         1.2%         24           13         South San Jose/Almaden         4.3%         3.5%         3.3%         4.1%         0.8%         22           14         Gitroy/Morgan Hill         4.9%         4.1%         3.4%         7.4%         3.0%         66           17         Hayward/San Leandro         7.9%         7.8%         8.1%         9.2%         1.1%	3	Mission District	18.8%					13.7%
6         San Mateo/Burlingame         5.8%         3.9%         4.4%         6.3%         1.9%         43           7         Redwood City/Menio Park         6.2%         4.5%         5.8%         9.9%         4.2%         77           8         Palo Alto/Los Altos         5.8%         5.0%         5.3%         6.6%         7.7%         1.1%         10           10         Saratoga/Cupertino         4.6%         3.9%         3.5%         4.1%         0.6%         11           10         Saratoga/Cupertino         4.6%         3.9%         3.5%         6.7%         1.2%         21           11         Central San Jose         9.3%         10.2%         12.5%         16.2%         3.7%         22           13         South San Jose/Almaden         4.3%         3.5%         3.3%         4.1%         0.8%         2.2%         1.3%         1.2%         21         1.3%         0.9%         22         1.1         4.3%         0.9%         22         1.4         Gitroy/Morgan Hill         4.9%         4.1%         3.4%         0.3%         6.6%         1.1%         1.1%         1.1%         1.1%         1.1%         1.1%         1.1%         1.1%         1.1%	4	Sunset District						-0.3%
7         Redwood City/Mento Park $6.2\%$ $4.5\%$ $5.8\%$ $9.9\%$ $4.2\%$ $7.\%$ 8         Palo Ato/Los Altos $5.8\%$ $5.0\%$ $5.2\%$ $7.1\%$ $1.9\%$ $33$ 9         Sunnyvale/Mountain View $5.6\%$ $5.3\%$ $6.6\%$ $7.7\%$ $1.1\%$ $11$ 10         Saratoga/Cupertino $4.6\%$ $3.9\%$ $3.5\%$ $4.1\%$ $0.6\%$ $10$ 11         Central San Jose $9.3\%$ $10.2\%$ $12.5\%$ $16.2\%$ $3.7\%$ $22$ 12         Milpitas/East San Jose $5.5\%$ $5.2\%$ $5.5\%$ $6.7\%$ $1.2\%$ $22$ 13         South San Jose/Almaden $4.3\%$ $3.5\%$ $3.3\%$ $4.1\%$ $0.8\%$ $0.7\%$ $2.2\%$ $11.6\%$ $0.3\%$ $0.2\%$ $2.1\%$ $0.3\%$ $0.2\%$ $2.1\%$ $0.3\%$ $0.2\%$ $0.1\%$ $0.3\%$ $0.2\%$ $0.1\%$ $0.3\%$ $0.2\%$ $0.1\%$ $0.3\%$ $0.2\%$ $0.1\%$ $0.3\%$ <t< td=""><td>5</td><td>Daly City/San Bruno</td><td></td><td></td><td></td><td></td><td></td><td>14.9%</td></t<>	5	Daly City/San Bruno						14.9%
8       Palo Alto/Los Altos $5.8\%$ $5.0\%$ $5.2\%$ $7.1\%$ $1.9\%$ $34$ 9       Sunnyvale/Mountain View $5.6\%$ $5.3\%$ $6.6\%$ $7.7\%$ $1.1\%$ $11$ 10       Saratoga/Cupertino $4.6\%$ $3.9\%$ $3.5\%$ $4.1\%$ $0.6\%$ $11$ 11       Central San Jose $9.3\%$ $10.2\%$ $12.5\%$ $16.2\%$ $3.7\%$ $22$ 13       South San Jose/Almaden $4.3\%$ $3.5\%$ $3.3\%$ $4.1\%$ $0.8\%$ $22$ 14       Gilroy/Morgan Hill $4.9\%$ $4.1\%$ $3.4\%$ $4.3\%$ $0.9\%$ $22$ 15       Livermore/Pleasanton $3.4\%$ $2.7\%$ $2.4\%$ $10.6\%$ $8.2\%$ $33$ 16       Fremont/Union City $4.7\%$ $3.9\%$ $4.4\%$ $7.4\%$ $3.0\%$ $61$ 18       Oakland/Alameda $17.9\%$ $18.7\%$ $21.8\%$ $25.3\%$ $3.5\%$ $11.\%$ 20       Richmond/El Cerrito $10.1\%$ $10.0\%$ $8.4\%$ $11.6\%$ $3.1\%$ $3$ <	6	San Mateo/Burlingame						43.7%
9       Sunnyvale/Mountain View $5.6\%$ $5.3\%$ $6.6\%$ $7.7\%$ $1.1\%$ $11$ 10       Saratoga/Cupertino $4.6\%$ $3.9\%$ $3.5\%$ $4.1\%$ $0.6\%$ $11$ 11       Central San Jose $9.3\%$ $10.2\%$ $12.5\%$ $16.2\%$ $3.7\%$ $22$ 12       Milpitax/East San Jose $5.5\%$ $5.5\%$ $5.7\%$ $1.2\%$ $22$ 13       South San Jose/Almaden $4.3\%$ $3.5\%$ $3.3\%$ $4.1\%$ $0.8\%$ $22$ 14       Gilroy/Morgan Hill $4.9\%$ $4.1\%$ $3.4\%$ $4.3\%$ $0.9\%$ $22$ 15       Livermore/Pleasanton $3.4\%$ $2.7\%$ $2.4\%$ $10.6\%$ $8.2\%$ $33$ 16       Fremont/Union City $4.7\%$ $3.9\%$ $4.4\%$ $7.4\%$ $3.0\%$ $66$ 17       Hayward/San Leandro $7.9\%$ $7.8\%$ $8.1\%$ $9.2\%$ $1.1\%$ $11$ 19       Berkeley/Albany $16.0\%$ $16.0\%$ $15.3\%$ $7.6\%$ $3.9\%$ $6$ $3.5\%$ $5.7\%$ <	7	Redwood City/Menlo Park						72.1%
$\begin{array}{c c c c c c c c c c c c c c c c c c c $	8	Palo Alto/Los Altos	5.8%	5.0%			1.9%	36.4%
11Central San Jose $9.3\%$ $10.2\%$ $12.5\%$ $16.2\%$ $3.7\%$ $22$ 12Milpitas/East San Jose $5.5\%$ $5.2\%$ $5.5\%$ $6.7\%$ $1.2\%$ $22$ 13South San Jose/Almaden $4.3\%$ $3.5\%$ $3.3\%$ $4.1\%$ $0.8\%$ $22$ 14Gilroy/Morgan Hill $4.9\%$ $4.1\%$ $3.4\%$ $4.3\%$ $3.6\%$ $3.4\%$ $4.3\%$ $3.6\%$ $3.4\%$ $4.3\%$ $3.6\%$ $3.4\%$ $4.3\%$ $3.6\%$ $3.2\%$ $3.3\%$ 15Livermore/Pleasanton $3.4\%$ $2.7\%$ $2.4\%$ $10.6\%$ $8.2\%$ $333$ 16Fremont/Union City $4.7\%$ $3.9\%$ $4.4\%$ $7.4\%$ $3.0\%$ $66$ 17Hayward/San Leandro $7.9\%$ $7.8\%$ $8.1\%$ $9.2\%$ $1.1\%$ $11.1\%$ 18Oakland/Alameda $17.9\%$ $18.7\%$ $18.7\%$ $21.8\%$ $25.3\%$ $3.5\%$ $11.1\%$ 19Berkeley/Albany $16.0\%$ $16.0\%$ $15.3\%$ $17.9\%$ $2.6\%$ $11.2\%$ 20Richmond/El Cerrito $10.1\%$ $10.0\%$ $8.4\%$ $11.6\%$ $3.1\%$ $31.1\%$ 21Concord/Martinez $6.8\%$ $6.8\%$ $6.1\%$ $7.6\%$ $1.5\%$ $22$ 22Walnut Creek/Lamorinda $5.7\%$ $5.4\%$ $5.7\%$ $9.6\%$ $3.9\%$ $66$ 23Danville/San Ramon $2.2\%$ $2.2\%$ $4.4\%$ $5.6\%$ $1.2\%$ $2$ 24Antioch/Pittsburg $5.8\%$ $5.2\%$ $4.7\%$	9	Sunnyvale/Mountain View	5.6%	5.3%				17.2%
12       Milipitas/East San Jose       5.5%       5.2%       5.5%       6.7%       1.2%       22         13       South San Jose/Almaden       4.3%       3.5%       3.3%       4.1%       0.8%       22         14       Gilroy/Morgan Hill       4.9%       4.1%       3.4%       4.3%       0.9%       22         15       Livermore/Pleasanton       3.4%       2.7%       2.4%       10.6%       8.2%       33         16       Fremont/Union City       4.7%       3.9%       4.4%       7.4%       3.0%       66         17       Hayward/San Leandro       7.9%       7.8%       8.1%       9.2%       1.1%       11         18       Oakland/Alameda       17.9%       18.7%       21.8%       25.3%       3.5%       12         20       Richmond/El Cerrito       10.1%       10.0%       8.4%       11.6%       3.1%       33         21       Concord/Martinez       6.8%       6.8%       6.1%       7.6%       1.5%       2         22       Walnut Creek/Lamorinda       5.7%       5.4%       5.7%       9.6%       3.9%       66         23       Danville/San Ramon       2.2%       2.0%       3.3%	10	Saratoga/Cupertino	4.6%	3.9%	3.5%	4.1%		16.4%
13South San Jose/Almaden $4.3\%$ $3.5\%$ $3.3\%$ $4.1\%$ $0.8\%$ $24$ 14Gilroy/Morgan Hill $4.9\%$ $4.1\%$ $3.4\%$ $4.3\%$ $0.9\%$ $21$ 15Livermore/Pleasanton $3.4\%$ $2.7\%$ $2.4\%$ $10.6\%$ $8.2\%$ $33$ 16Fremont/Union City $4.7\%$ $3.9\%$ $4.4\%$ $7.4\%$ $30\%$ $66$ 17Hayward/San Leandro $7.9\%$ $7.8\%$ $8.1\%$ $9.2\%$ $1.1\%$ $11$ 18Oakland/Alameda $17.9\%$ $18.7\%$ $21.8\%$ $25.3\%$ $3.5\%$ $11$ 19Berkeley/Albany $16.0\%$ $16.0\%$ $15.3\%$ $17.9\%$ $2.6\%$ $11$ 20Richmond/El Cerrito $10.1\%$ $10.0\%$ $8.4\%$ $11.6\%$ $3.1\%$ $32$ 21Concord/Martinez $6.8\%$ $6.8\%$ $6.1\%$ $7.5\%$ $2.6\%$ $1.5\%$ 22Walnut Creek/Lamorinda $5.7\%$ $5.4\%$ $5.7\%$ $9.6\%$ $3.9\%$ $66$ 23Danville/San Ramon $2.2\%$ $2.0\%$ $3.3\%$ $10.3\%$ $7.0\%$ $20$ 24Antioch/Pittsburg $5.8\%$ $5.2\%$ $4.4\%$ $5.6\%$ $1.2\%$ $2$ 25Vallejo/Benicia $7.8\%$ $7.6\%$ $8.0\%$ $19.3\%$ $11.3\%$ $14$ 26Fairfield/Vacaville $5.6\%$ $5.3\%$ $4.7\%$ $7.9\%$ $3.2\%$ $6$ 27Napa $6.6\%$ $5.8\%$ $4.9\%$ $11.6\%$ $6.7\%$ $13$ 28	11	Central San Jose	9.3%	10.2%				29.5%
14       Gilroy/Morgan Hill       4.9%       4.1%       3.4%       4.3%       0.9%       22         15       Livermore/Pleasanton       3.4%       2.7%       2.4%       10.6%       8.2%       33         16       Fremont/Union City       4.7%       3.9%       4.4%       7.4%       3.0%       66         17       Hayward/San Leandro       7.9%       7.8%       8.1%       9.2%       1.1%       11         18       Oakland/Alameda       17.9%       18.7%       21.8%       25.3%       3.5%       11         19       Berkeley/Albany       16.0%       16.0%       15.3%       17.9%       2.6%       11         20       Richmond/El Cerrito       10.1%       10.0%       8.4%       11.6%       3.1%       33         21       Concord/Martinez       6.8%       6.8%       6.1%       7.6%       1.5%       2         22       Walnut Creek/Lamorinda       5.7%       5.4%       5.7%       9.6%       3.9%       6         23       Danville/San Ramon       2.2%       2.0%       3.3%       10.3%       7.0%       20         24       Antioch/Pittsburg       5.8%       5.2%       4.4%       5.6	12	Milpitas/East San Jose	5.5%	5.2%	5.5%	6.7%		22.2%
Is         Livermore/Pleasanton         3.4%         2.7%         2.4%         10.6%         8.2%         33           16         Fremont/Union City         4.7%         3.9%         4.4%         7.4%         3.0%         66           17         Hayward/San Leandro         7.9%         7.8%         8.1%         9.2%         1.1%         11           18         Oakland/Alameda         17.9%         18.7%         21.8%         25.3%         3.5%         11           19         Berkeley/Albany         16.0%         16.0%         15.3%         17.9%         2.6%         11           20         Richmond/El Cerrito         10.1%         10.0%         8.4%         11.6%         3.1%         33           21         Concord/Martinez         6.8%         6.8%         6.1%         7.6%         1.5%         22           22         Walnut Creek/Lamorinda         5.7%         5.4%         5.7%         9.6%         3.9%         66           23         Danville/San Ramon         2.2%         2.0%         3.3%         10.3%         7.0%         20           24         Antioch/Pittsburg         5.8%         5.2%         4.4%         5.6%         1.2%	13	South San Jose/Almaden	4.3%	3.5%	3.3%	4.1%	0.8%	26.0%
16         Fremont/Union City         4.7%         3.9%         4.4%         7.4%         3.0%         66           17         Hayward/San Leandro         7.9%         7.8%         8.1%         9.2%         1.1%         11           18         Oakland/Alameda         17.9%         18.7%         21.8%         25.3%         3.5%         11           19         Berkeley/Albany         16.0%         16.0%         15.3%         17.9%         2.6%         11           20         Richmond/El Cerrito         10.1%         10.0%         8.4%         11.6%         3.1%         33           21         Concord/Martinez         6.8%         6.8%         6.1%         7.6%         1.5%         2           22         Walnut Creek/Lamorinda         5.7%         5.4%         5.7%         9.6%         3.9%         66           23         Danville/San Ramon         2.2%         2.0%         3.3%         10.3%         7.0%         2.0           24         Antioch/Pittsburg         5.8%         5.2%         4.4%         5.6%         1.2%         2           25         Vallejo/Benicia         7.8%         7.6%         8.0%         19.3%         11.3%         14 <td>14</td> <td>Gilroy/Morgan Hill</td> <td>4.9%</td> <td></td> <td></td> <td></td> <td></td> <td>27.8%</td>	14	Gilroy/Morgan Hill	4.9%					27.8%
17       Hayward/San Leandro       7.9%       7.8%       8.1%       9.2%       1.1%       1         18       Oakland/Alameda       17.9%       18.7%       21.8%       25.3%       3.5%       1         19       Berkeley/Albany       16.0%       16.0%       15.3%       17.9%       2.6%       1         20       Richmond/El Cerrito       10.1%       10.0%       8.4%       11.6%       3.1%       3         21       Concord/Martinez       6.8%       6.8%       6.1%       7.6%       1.5%       2         22       Walnut Creek/Lamorinda       5.7%       5.4%       5.7%       9.6%       3.9%       6         23       Danville/San Ramon       2.2%       2.0%       3.3%       10.3%       7.0%       20         24       Antioch/Pittsburg       5.8%       5.2%       4.4%       5.6%       1.2%       2         25       Vallejo/Benicia       7.8%       7.6%       8.0%       19.3%       11.3%       14         26       Fairfield/Vacaville       5.6%       5.3%       4.7%       7.9%       3.2%       6         27       Napa       6.6%       5.8%       4.9%       11.6%       6.7%<	15	Livermore/Pleasanton	3.4%	2.7%	2.4%	10.6%	8.2%	333.5%
18         Oakland/Alameda         17.9%         18.7%         21.8%         25.3%         3.5%         11           19         Berkeley/Albany         16.0%         16.0%         15.3%         17.9%         2.6%         11           20         Richmond/El Cerrito         10.1%         10.0%         8.4%         11.6%         3.1%         33           21         Concord/Martinez         6.8%         6.8%         6.1%         7.6%         1.5%         22           21         Concord/Martinez         6.8%         6.8%         6.1%         7.6%         1.5%         22           21         Concord/Martinez         6.8%         6.8%         6.1%         7.6%         1.5%         22           22         Walnut Creek/Lamorinda         5.7%         5.4%         5.7%         9.6%         3.9%         66           23         Danville/San Ramon         2.2%         2.0%         3.3%         10.3%         7.0%         20           24         Antioch/Pittsburg         5.8%         5.2%         4.4%         5.6%         1.2%         2           25         Vallejo/Benicia         7.8%         7.6%         8.0%         19.3%         11.3%         14	16	Fremont/Union City	4.7%	3.9%	4.4%			69.1%
19       Berkeley/Albany       16.0%       15.3%       17.9%       2.6%       1         20       Richmond/El Cerrito       10.1%       10.0%       8.4%       11.6%       3.1%       33         21       Concord/Martinez       6.8%       6.8%       6.1%       7.6%       1.5%       2         22       Walnut Creek/Lamorinda       5.7%       5.4%       5.7%       9.6%       3.9%       66         23       Danville/San Ramon       2.2%       2.0%       3.3%       10.3%       7.0%       20         24       Antioch/Pittsburg       5.8%       5.2%       4.4%       5.6%       1.2%       2         25       Vallejo/Benicia       7.8%       7.6%       8.0%       19.3%       11.3%       14         26       Fairfield/Vacaville       5.6%       5.3%       4.7%       7.9%       3.2%       6         27       Napa       6.6%       5.8%       4.9%       11.6%       6.7%       13         28       t. Helena/Calistoga       4.5%       3.5%       2.6%       3.8%       1.1%       4         29       Petaluma/Sonoma       5.6%       4.1%       2.7%       4.6%       2.0%       7	17	Hayward/San Leandro	7.9%	7.8%	8.1%	9.2%		13.1%
20         Richmond/El Cerrito         10.1%         10.0%         8.4%         11.6%         3.1%         3           21         Concord/Martinez         6.8%         6.8%         6.1%         7.6%         1.5%         2           22         Walnut Creek/Lamorinda         5.7%         5.4%         5.7%         9.6%         3.9%         66           23         Danville/San Ramon         2.2%         2.0%         3.3%         10.3%         7.0%         20           24         Antioch/Pittsburg         5.8%         5.2%         4.4%         5.6%         1.2%         2           25         Vallejo/Benicia         7.8%         7.6%         8.0%         19.3%         11.3%         14           26         Fairfield/Vacaville         5.6%         5.3%         4.7%         7.9%         3.2%         6           27         Napa         6.6%         5.8%         4.9%         11.6%         6.7%         13           28         t. Helena/Calistoga         4.5%         3.5%         2.6%         3.8%         1.1%           29         Petaluma/Sonoma         5.6%         4.1%         2.7%         4.6%         2.0%         7           30	18	Oakland/Alameda	17.9%	18.7%	21.8%	25.3%	3.5%	15.8%
21       Concord/Martinez       6.8%       6.8%       6.1%       7.6%       1.5%       2.         22       Walnut Creek/Lamorinda       5.7%       5.4%       5.7%       9.6%       3.9%       66         23       Danville/San Ramon       2.2%       2.0%       3.3%       10.3%       7.0%       20         24       Antioch/Pittsburg       5.8%       5.2%       4.4%       5.6%       1.2%       2         25       Vallejo/Benicia       7.8%       7.6%       8.0%       19.3%       11.3%       14         26       Fairfield/Vacaville       5.6%       5.3%       4.7%       7.9%       3.2%       66         27       Napa       6.6%       5.8%       4.9%       11.6%       6.7%       13         28       St. Helena/Calistoga       4.5%       3.5%       2.6%       3.8%       1.1%       4         29       Petaluma/Sonoma       5.6%       4.1%       2.7%       4.6%       2.0%       7         30       Santa Rosa/Sebastopol       6.2%       5.4%       3.9%       9.1%       5.2%       13         31       Healdsburg/Cloverdale       4.8%       4.3%       3.5%       5.9%       2.	19	Berkeley/Albany	16.0%	16.0%	15.3%	17.9%	2.6%	17.1%
22       Walnut Creek/Lamorinda       5.7%       5.4%       5.7%       9.6%       3.9%       6         23       Danville/San Ramon       2.2%       2.0%       3.3%       10.3%       7.0%       20         24       Antioch/Pittsburg       5.8%       5.2%       4.4%       5.6%       1.2%       2         25       Vallejo/Benicia       7.8%       7.6%       8.0%       19.3%       11.3%       14         26       Fairfield/Vacaville       5.6%       5.3%       4.7%       7.9%       3.2%       6         27       Napa       6.6%       5.8%       4.9%       11.6%       6.7%       13         28       St. Helena/Calistoga       4.5%       3.5%       2.6%       3.8%       1.1%       4         29       Petaluma/Sonoma       5.6%       4.1%       2.7%       4.6%       2.0%       7         30       Santa Rosa/Sebastopol       6.2%       5.4%       3.9%       9.1%       5.2%       13         31       Healdsburg/Cloverdale       4.8%       4.3%       3.5%       5.9%       2.4%       6         32       Novato       5.1%       4.9%       3.3%       4.7%       1.3%	20	Richmond/El Cerrito	10.1%					37.1%
23Danville/San Ramon2.2%2.0% $3.3\%$ $10.3\%$ $7.0\%$ 2024Antioch/Pittsburg $5.8\%$ $5.2\%$ $4.4\%$ $5.6\%$ $1.2\%$ $2$ 25Vallejo/Benicia $7.8\%$ $7.6\%$ $8.0\%$ $19.3\%$ $11.3\%$ $14$ 26Fairfield/Vacaville $5.6\%$ $5.3\%$ $4.7\%$ $7.9\%$ $3.2\%$ $6$ 27Napa $6.6\%$ $5.8\%$ $4.9\%$ $11.6\%$ $6.7\%$ $13$ 28St. Helena/Calistoga $4.5\%$ $3.5\%$ $2.6\%$ $3.8\%$ $1.1\%$ $4$ 29Petaluma/Sonoma $5.6\%$ $4.1\%$ $2.7\%$ $4.6\%$ $2.0\%$ $7$ 30Santa Rosa/Sebastopol $6.2\%$ $5.4\%$ $3.9\%$ $9.1\%$ $5.2\%$ $13$ 31Healdsburg/Cloverdale $4.8\%$ $4.3\%$ $3.5\%$ $5.9\%$ $2.4\%$ $6$ 32Novato $5.1\%$ $4.9\%$ $3.3\%$ $4.7\%$ $1.3\%$ $3$ 33San Rafael $5.9\%$ $5.7\%$ $4.8\%$ $7.1\%$ $2.2\%$ $4$ 4Mill Valley/Sausalito $4.1\%$ $3.1\%$ $2.7\%$ $3.0\%$ $0.3\%$ $1$ Bay Area $10.0\%$ $9.4\%$ $9.8\%$ $13.4\%$ $3.6\%$ $3.0\%$ San Francisco $27.6\%$ $27.0\%$ $28.4\%$ $33.4\%$ $5.0\%$ $1$ San Mateo $6.3\%$ $4.3\%$ $5.2\%$ $7.5\%$ $2.3\%$ $4$ Santa Clara $5.8\%$ $5.5\%$ $6.4\%$ $8.2\%$ $1.8\%$	21	Concord/Martinez	6.8%	6.8%				24.4%
24         Antioch/Pittsburg         5.8%         5.2%         4.4%         5.6%         1.2%         2           25         Vallejo/Benicia         7.8%         7.6%         8.0%         19.3%         11.3%         14           26         Fairfield/Vacaville         5.6%         5.3%         4.7%         7.9%         3.2%         6           27         Napa         6.6%         5.8%         4.9%         11.6%         6.7%         13           28         St. Helena/Calistoga         4.5%         3.5%         2.6%         3.8%         1.1%         4           29         Petaluma/Sonoma         5.6%         4.1%         2.7%         4.6%         2.0%         7           30         Santa Rosa/Sebastopol         6.2%         5.4%         3.9%         9.1%         5.2%         13           31         Healdsburg/Cloverdale         4.8%         4.3%         3.5%         5.9%         2.4%         6           32         Novato         5.1%         4.9%         3.3%         4.7%         1.3%         3           33         San Rafael         5.9%         5.7%         4.8%         7.1%         2.2%         4           34	22	Walnut Creek/Lamorinda	5.7%	5.4%		9.6%		69.3%
25         Vallejo/Benicia         7.8%         7.6%         8.0%         19.3%         11.3%         14           26         Fairfield/Vacaville         5.6%         5.3%         4.7%         7.9%         3.2%         6           27         Napa         6.6%         5.8%         4.9%         11.6%         6.7%         13           28         St. Helena/Calistoga         4.5%         3.5%         2.6%         3.8%         1.1%         4           29         Petaluma/Sonoma         5.6%         4.1%         2.7%         4.6%         2.0%         7           30         Santa Rosa/Sebastopol         6.2%         5.4%         3.9%         9.1%         5.2%         13           31         Healdsburg/Cloverdale         4.8%         4.3%         3.5%         5.9%         2.4%         6           32         Novato         5.1%         4.9%         3.3%         4.7%         1.3%         3           33         San Rafael         5.9%         5.7%         4.8%         7.1%         2.2%         4           34         Mill Valley/Sausalito         4.1%         3.1%         2.7%         3.0%         0.3%         1           Bay A	23	Danville/San Ramon						209.9%
26         Fairfield/Vacaville         5.6%         5.3%         4.7%         7.9%         3.2%         6           27         Napa         6.6%         5.8%         4.9%         11.6%         6.7%         13           28         St. Helena/Calistoga         4.5%         3.5%         2.6%         3.8%         1.1%         4           29         Petaluma/Sonoma         5.6%         4.1%         2.7%         4.6%         2.0%         7           30         Santa Rosa/Sebastopol         6.2%         5.4%         3.9%         9.1%         5.2%         13           31         Healdsburg/Cloverdale         4.8%         4.3%         3.5%         5.9%         2.4%         6           32         Novato         5.1%         4.9%         3.3%         4.7%         1.3%         3           33         San Rafael         5.9%         5.7%         4.8%         7.1%         2.2%         4           34         Mill Valley/Sausalito         4.1%         3.1%         2.7%         3.0%         0.3%         1           Bay Area         10.0%         9.4%         9.8%         13.4%         3.6%         3           San Francisco         27	24	Antioch/Pittsburg	5.8%	5.2%	4.4%	5.6%	1.2%	26.7%
27       Napa       6.6%       5.8%       4.9%       11.6%       6.7%       13         28       St. Helena/Calistoga       4.5%       3.5%       2.6%       3.8%       1.1%       4         29       Petaluma/Sonoma       5.6%       4.1%       2.7%       4.6%       2.0%       7         30       Santa Rosa/Sebastopol       6.2%       5.4%       3.9%       9.1%       5.2%       13         31       Healdsburg/Cloverdale       4.8%       4.3%       3.5%       5.9%       2.4%       6         32       Novato       5.1%       4.9%       3.3%       4.7%       1.3%       3         33       San Rafael       5.9%       5.7%       4.8%       7.1%       2.2%       4         34       Mill Valley/Sausalito       4.1%       3.1%       2.7%       3.0%       0.3%       1         Bay Area       10.0%       9.4%       9.8%       13.4%       3.6%       3.4%         San Francisco       27.6%       27.0%       28.4%       33.4%       5.0%       1         San Mateo       6.3%       4.3%       5.2%       7.5%       2.3%       4         Santa Clara       5.8%		Vallejo/Benicia						142.1%
28         St. Helena/Calistoga         4.5%         3.5%         2.6%         3.8%         1.1%         4           29         Petaluma/Sonoma         5.6%         4.1%         2.7%         4.6%         2.0%         7           30         Santa Rosa/Sebastopol         6.2%         5.4%         3.9%         9.1%         5.2%         13           31         Healdsburg/Cloverdale         4.8%         4.3%         3.5%         5.9%         2.4%         6           32         Novato         5.1%         4.9%         3.3%         4.7%         1.3%         3           33         San Rafael         5.9%         5.7%         4.8%         7.1%         2.2%         4           34         Mill Valley/Sausalito         4.1%         3.1%         2.7%         3.0%         0.3%         1           Bay Area         10.0%         9.4%         9.8%         13.4%         3.6%         3           San Francisco         27.6%         27.0%         28.4%         33.4%         5.0%         1           San Mateo         6.3%         4.3%         5.2%         7.5%         2.3%         4           Santa Clara         5.8%         5.5% <td< td=""><td>26</td><td>Fairfield/Vacaville</td><td></td><td></td><td></td><td></td><td></td><td>68.1%</td></td<>	26	Fairfield/Vacaville						68.1%
29         Petaluma/Sonoma         5.6%         4.1%         2.7%         4.6%         2.0%         7           30         Santa Rosa/Sebastopol         6.2%         5.4%         3.9%         9.1%         5.2%         13           31         Healdsburg/Cloverdale         4.8%         4.3%         3.5%         5.9%         2.4%         6           32         Novato         5.1%         4.9%         3.3%         4.7%         1.3%         3           33         San Rafael         5.9%         5.7%         4.8%         7.1%         2.2%         4           34         Mill Valley/Sausalito         4.1%         3.1%         2.7%         3.0%         0.3%         1           Bay Area         10.0%         9.4%         9.8%         13.4%         3.6%         3           San Francisco         27.6%         27.0%         28.4%         33.4%         5.0%         1           San Mateo         6.3%         4.3%         5.2%         7.5%         2.3%         4           Santa Clara         5.8%         5.5%         6.4%         8.2%         1.8%         2           Alameda         11.1%         11.0%         11.9%         15.7% </td <td>27</td> <td>Napa</td> <td>6.6%</td> <td>5.8%</td> <td>4.9%</td> <td></td> <td></td> <td>135.0%</td>	27	Napa	6.6%	5.8%	4.9%			135.0%
30       Santa Rosa/Sebastopol       6.2%       5.4%       3.9%       9.1%       5.2%       13         31       Healdsburg/Cloverdale       4.8%       4.3%       3.5%       5.9%       2.4%       6         32       Novato       5.1%       4.9%       3.3%       4.7%       1.3%       3         33       San Rafael       5.9%       5.7%       4.8%       7.1%       2.2%       4         34       Mill Valley/Sausalito       4.1%       3.1%       2.7%       3.0%       0.3%       1         Bay Area       IO.0%       9.4%       9.8%       I 3.4%       3.6%       3         San Francisco       27.6%       27.0%       28.4%       33.4%       5.0%       1         San Mateo       6.3%       4.3%       5.2%       7.5%       2.3%       4         Santa Clara       5.8%       5.5%       6.4%       8.2%       1.8%       2         Alameda       11.1%       11.0%       11.9%       15.7%       3.8%       3         Contra Costa       6.7%       6.4%       5.8%       8.9%       3.1%       5	28	St. Helena/Calistoga	4.5%	3.5%				43.4%
31         Healdsburg/Cloverdale         4.8%         4.3%         3.5%         5.9%         2.4%         6           32         Novato         5.1%         4.9%         3.3%         4.7%         1.3%         3           33         San Rafael         5.9%         5.7%         4.8%         7.1%         2.2%         4           34         Mill Valley/Sausalito         4.1%         3.1%         2.7%         3.0%         0.3%         1           Bay Area         10.0%         9.4%         9.8%         13.4%         3.6%         3           San Francisco         27.6%         27.0%         28.4%         33.4%         5.0%         1           San Mateo         6.3%         4.3%         5.2%         7.5%         2.3%         4           Santa Clara         5.8%         5.5%         6.4%         8.2%         1.8%         2           Alameda         11.1%         11.0%         11.9%         15.7%         3.8%         3           Contra Costa         6.7%         6.4%         5.8%         8.9%         3.1%         5	29	Petaluma/Sonoma	5.6%	4.1%	2.7%	4.6%		73.7%
32         Novato         5.1%         4.9%         3.3%         4.7%         1.3%         3           33         San Rafael         5.9%         5.7%         4.8%         7.1%         2.2%         4           34         Mill Valley/Sausalito         4.1%         3.1%         2.7%         3.0%         0.3%         1           Bay Area         10.0%         9.4%         9.8%         13.4%         3.6%         3           San Francisco         27.6%         27.0%         28.4%         33.4%         5.0%         1           San Mateo         6.3%         4.3%         5.2%         7.5%         2.3%         4           Santa Clara         5.8%         5.5%         6.4%         8.2%         1.8%         2           Alameda         11.1%         11.0%         11.9%         15.7%         3.8%         3           Contra Costa         6.7%         6.4%         5.8%         8.9%         3.1%         5	30	Santa Rosa/Sebastopol	6.2%	5.4%	3.9%	9.1%	5.2%	135.7%
33         San Rafael         5.9%         5.7%         4.8%         7.1%         2.2%         4           34         Mill Valley/Sausalito         4.1%         3.1%         2.7%         3.0%         0.3%         1           Bay Area         10.0%         9.4%         9.8%         13.4%         3.6%         3           San Francisco         27.6%         27.0%         28.4%         33.4%         5.0%         1           San Mateo         6.3%         4.3%         5.2%         7.5%         2.3%         4           Santa Clara         5.8%         5.5%         6.4%         8.2%         1.8%         2           Alameda         11.1%         11.0%         11.9%         15.7%         3.8%         3           Contra Costa         6.7%         6.4%         5.8%         8.9%         3.1%         5	31	Healdsburg/Cloverdale	4.8%	4.3%	3.5%	5.9%	2.4%	69.1%
34         Mill Valley/Sausalito         4.1%         3.1%         2.7%         3.0%         0.3%         1           Bay Area         10.0%         9.4%         9.8%         13.4%         3.6%         3           San Francisco         27.6%         27.0%         28.4%         33.4%         5.0%         1           San Mateo         6.3%         4.3%         5.2%         7.5%         2.3%         4           Santa Clara         5.8%         5.5%         6.4%         8.2%         1.8%         2           Alameda         11.1%         11.0%         11.9%         15.7%         3.8%         3           Contra Costa         6.7%         6.4%         5.8%         8.9%         3.1%         5	32	Novato	5.1%	4.9%	3.3%	4.7%	1.3%	39.6%
Bay Area         10.0%         9.4%         9.8%         13.4%         3.6%         3.4%           San Francisco         27.6%         27.0%         28.4%         33.4%         5.0%         1           San Mateo         6.3%         4.3%         5.2%         7.5%         2.3%         4           Santa Clara         5.8%         5.5%         6.4%         8.2%         1.8%         2           Alameda         11.1%         11.0%         11.9%         15.7%         3.8%         3           Contra Costa         6.7%         6.4%         5.8%         8.9%         3.1%         5	33	San Rafael	5. <b>9%</b>	5.7%	4.8%	7.1%	2.2%	46.6%
San Francisco         27.6%         27.0%         28.4%         33.4%         5.0%         1           San Mateo         6.3%         4.3%         5.2%         7.5%         2.3%         4           Santa Clara         5.8%         5.5%         6.4%         8.2%         1.8%         2           Alameda         11.1%         11.0%         11.9%         15.7%         3.8%         3           Contra Costa         6.7%         6.4%         5.8%         8.9%         3.1%         5	34	Mill Valley/Sausalito	4.1%	3.1%	2.7%	3.0%	0.3%	11.5%
San Mateo6.3%4.3%5.2%7.5%2.3%4Santa Clara5.8%5.5%6.4%8.2%1.8%2Alameda11.1%11.0%11.9%15.7%3.8%3Contra Costa6.7%6.4%5.8%8.9%3.1%5			10.0%	9.4%	9.8%	13.4%	3.6%	36.6%
Santa Clara5.8%5.5%6.4%8.2%1.8%2Alameda11.1%11.0%11.9%15.7%3.8%3Contra Costa6.7%6.4%5.8%8.9%3.1%5		San Francisco	27.6%	27.0%	28.4%	33.4%	5.0%	17.7%
Alameda 11.1% 11.0% 11.9% 15.7% 3.8% 3 Contra Costa 6.7% 6.4% 5.8% 8.9% 3.1% 5		San Mateo	6.3%	4.3%	5.2%	7.5%	2.3%	42.9%
Alameda 11.1% 11.0% 11.9% 15.7% 3.8% 3 Contra Costa 6.7% 6.4% 5.8% 8.9% 3.1% 5		Santa Clara		5.5%	6.4%	8.2%		28.3%
Contra Costa 6.7% 6.4% 5.8% 8.9% 3.1% 5			11.1%		11.9%	15.7%		31.9%
							3.1%	54.4%
Solano 6.5% 6.2% 5.8% 13.1% 7.3% 12				6.2%	5.8%	13.1%	7.3%	124.8%
					4.3%	9.4%	5.1%	117.8%
						7.1%	3.7%	109.3%
								37.5%

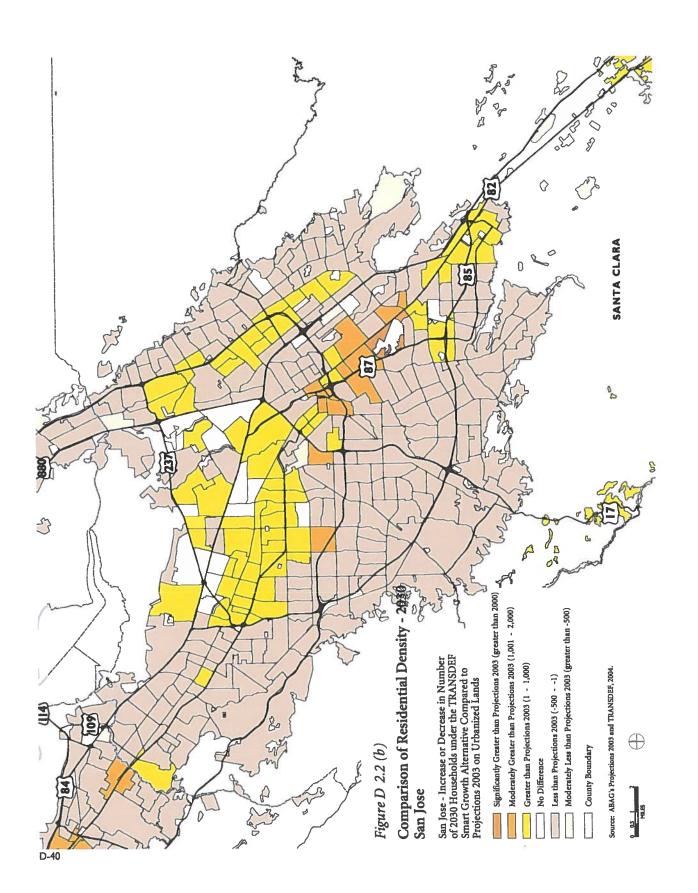


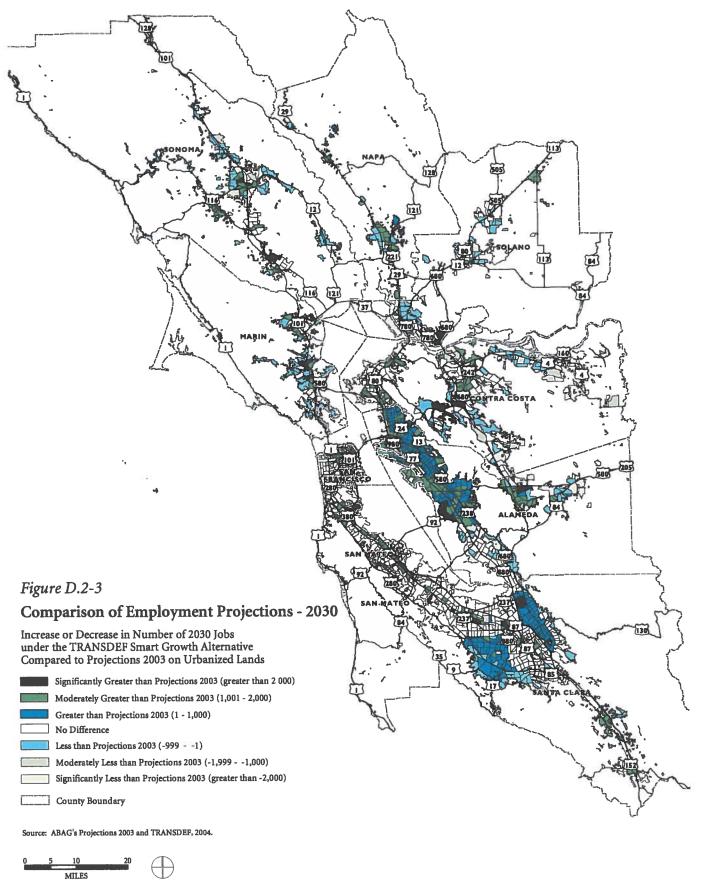




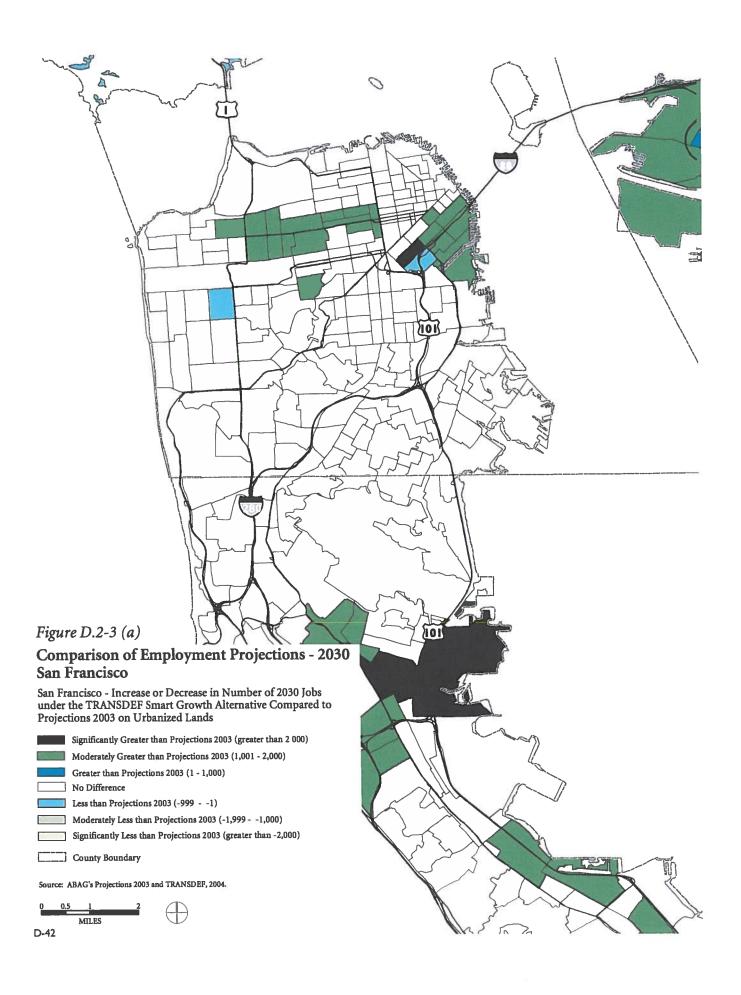


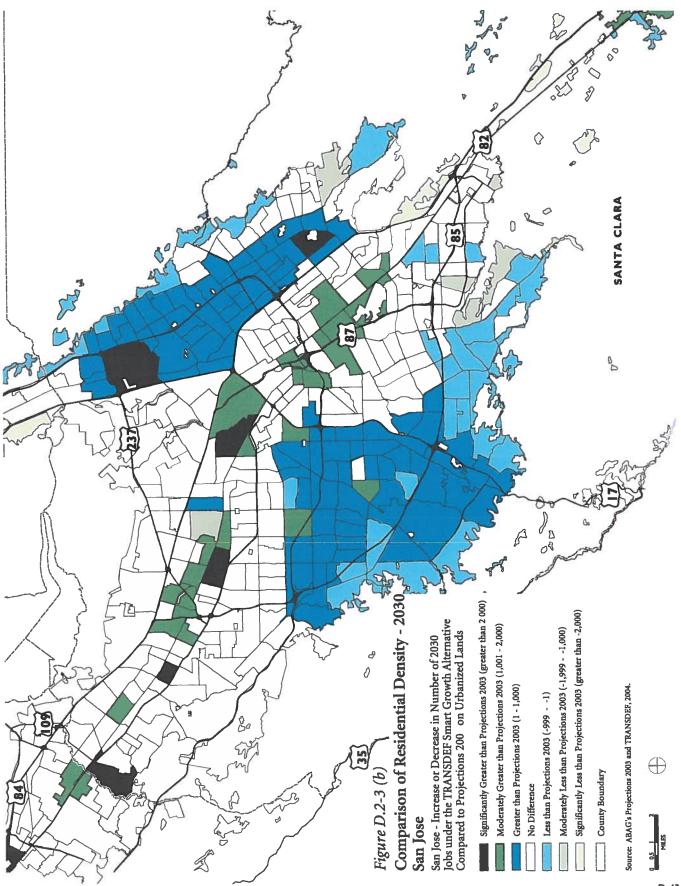






D-41





### **Appendix D:**

# MTC Resolution 3680 Certifying the EIR on the Transportation 2030 Plan

Attachment A Resolution No. 3680 Page 1 of 1

#### Environmental Impact Report for the Transportation 2030 Plan

The Draft and Final Environmental Impact Report for the Transportation 2030 Plan documents are on file in the offices of the Metropolitan Transportation Commission, MetroCenter, 101 Eighth Street, Oakland, California 94607.

#### **ABSTRACT**

Resolution No. 3680

This resolution certifies the Environmental Impact Report for the Transportation 2030 Plan.

#### Re: <u>Review and Certification of the Environmental Impact Report for the Transportation 2030</u> <u>Plan</u>

#### METROPOLITAN TRANSPORTATION COMMISSION RESOLUTION NO. 3680

WHEREAS, the Metropolitan Transportation Commission (MTC) is the regional transportation planning agency for the San Francisco Bay Area pursuant to Government Code Sections 66500 et seq.; and

WHEREAS, MTC staff and its consultants have prepared a program Environmental Impact Report (EIR) for the Transportation 2030 Plan, pursuant to provisions of the California Environmental Quality Act (CEQA); and

WHEREAS, on November 12, 2004 MTC released for public review and comment the Draft EIR for the Transportation 2030 Plan to all interested parties, and, following a 56-day public review period ending January 7, 2005 responded to all comments received and incorporated comments as appropriate into the final EIR; and

WHEREAS, MTC staff and its consultants have prepared findings, facts in support of findings, statement of overriding considerations, and mitigation monitoring program and incorporated them into the final EIR; and

WHEREAS, MTC staff has provided a written response to each public agency that commented on the Draft EIR ten days before certification of the final EIR; and

WHEREAS, MTC has reviewed and considered the information contained in the Draft and Final EIR, including findings/facts in support of findings, statement of overriding considerations, and mitigation monitoring program, prior to approval of the Transportation 2030 Plan; now, therefore, be it

#### ABSTRACT

#### Resolution No. 3680

This resolution certifies the Environmental Impact Report for the Transportation 2030 Plan.

MTC Resolution No. 3425 Page 2

<u>RESOLVED</u>, that MTC has reviewed the Draft and Final Environmental Impact Report for the Transportation 2030 Plan, included herein as Attachment A and made a part hereof by reference, and certifies that it has been completed in compliance with CEQA.

#### METROPOLITAN TRANSPORTATION COMMISSION

Steve Kinsey, Chair

The above resolution was entered into by the Metropolitan Transportation Commission at a regular meeting of the Commission held in Oakland, California, on February 23, 2005.

## **Appendix E:**

# Summary Comparison of Projections 2003 & Projections 2002

### Appendix E: Projections 2003 vs. Projections 2002

The purpose of this appendix is to present additional detailed information on the differences between the population, employment and land use information used in the 2001 RTP EIR ("Projections 2002") and the information used in this EIR ("Projections 2003"). The Transportation 2030 Plan uses Projections 2003, developed by the Association of Bay Area Governments (ABAG), for transportation demand analysis, modeling and related impact analyses, which are presented in this EIR. ABAG's Projections 2003 (P-2003) is based on a very different set of policy assumptions than previous series of the long-run economic-demographic forecasts which ABAG has been producing since 1973. Unlike previous Projections, such as Projections 2002 (P-2002), which are based on adopted land use plans from cities, counties, and agencies in the region, P-2003 is based on the ABAG's Regional Smart Growth Strategy/Regional Livability Footprint Project, briefly described below.

#### SMART GROWTH STRATEGY/REGIONAL LIVABILITY FOOTPRINT PROJECT

The Smart Growth Strategy/Regional Livability Footprint Project was developed by ABAG along with its other regional agency partners (including MTC, BAAQMD, BCDC, and SF Bay RWQCB) and a group of stakeholders known as the Bay Area Alliance for Sustainable Development. According to ABAG, "Smart Growth can best be described as development that revitalizes central cities and older suburbs, supports and enhances public transit, promotes walking and bicycling opportunities, and preserves open spaces and agricultural lands" (ABAG, 2004). The Regional Smart Growth Vision was created out of a two-year effort to establish principles and strategies for how the nine-county Bay Area can grow smarter and become more sustainable over the next 20 years and beyond.<sup>1</sup> The objectives were to minimize sprawl, provide adequate and affordable housing, improve mobility, protect environmental quality and preserve open space. A related objective of the project and the land use projections that results from it was to guide infrastructure investment decisions being made by MTC and other regional agencies.

With these objectives in mind, ABAG incorporated the Vision into its economic-demographic and land use projections. As a result, P-2003 assigns growth potential to local jurisdictions following approximately the pattern that the Smart Growth Vision intended. While these projections do not meet the numerical goals of the Vision, they do reflect a change in the prevailing patterns of development. To realize the Vision represented by P-2003, local jurisdictions will need to make changes in their general plans and zoning ordinances to increase density on infill sites and to allow residential development on commercial and industrial sites, Also, State and regional agencies will need to provide incentives and financial support for housing and business development.

<sup>&</sup>lt;sup>1</sup> For more information about ABAG's Smart Growth Vision, see http://www.abag.ca.gov/planning/smartgrowth/

#### **PROJECTIONS 2003 VS. PROJECTIONS 2002**

Previous Projections, such as P-2002, do not assume implementation of Smart Growth policies. As such, unlike P-2003, P-2002 does not assume that State, local, or regional policy makers would change land use policies or other types of funding decisions in a way that would affect regional development patterns. It also does not assume any incremental funding to promote housing development, or any policy that would substitute for that type of funding.

At a more quantitative level, ABAG's Regional Smart Growth policy assumptions result in a higher number of housing units produced than under previous forecasting assumptions. It is estimated that by the year 2030, extending the previous forecast of P-2002 by five years, the policies provide 126,350 incremental housing units above previous forecasts and an additional 350,000 residents. This housing is also expected to provide a home for 214,100 more employed residents than the P-2002 base case forecast. This increase in employed residents is significant when compared to the number of jobs in the region, as it gives a rough estimate of the net interregional commute.

It is important to note, however, that P-2003 shows almost 59,600 additional jobs, which runs counter to the objectives of the Smart Growth Vision because it would exacerbate the jobs/housing imbalance, resulting in longer commutes. However, the change in jobs is a result of the incremental construction activity in the forecast, and the employment generated to meet the needs for goods and services required by the additional 350,000 residents of the region. Incremental jobs tend to be distributed in proportion to construction activity and population changes.

Tables E-1 to E-4 compare population, employment, employed residents, and households for 2000 and 2025 in MTC's 34 superdistricts and in each of the nine counties for P-2202 and P-2003. The differences are highlighted in the following sections.

#### COUNTY-BY-COUNTY COMPARISONS

At the county level, the general pattern, comparing Projections 2003 to Projections 2002, is a decrease in the population and jobs in the North Bay counties, and increases in population, jobs, housing and workers in the central Bay Area. Santa Clara shows the largest numerical increase in population, jobs, housing and workers; followed by San Francisco and Alameda Counties. Contra Costa shows the least differences comparing Projections 2002 to Projections 2003.

The largest numerical decreases in population, jobs, housing and workers are in Sonoma County. Solano County shows slight decreases in population, housing and resident workers but a slight increase in the number of jobs. Napa County consistently shows the highest percentage decreases in population, jobs, housing, and workers.

The most significant differences are seen in projections for the City and County of San Francisco, which, under the assumptions of P-2003, is projected to absorb 74,574 more people (9.1 percent) and 32,838 more households (9.4 percent) by year 2025. That amounts to a population increase

of 151,600 and an increase in the number of households of 52,134 between 2000 and 2025; a rate of growth much higher than previously anticipated by P-2002.

The largest numerical decreases in population, jobs, housing and workers are in Sonoma County. Solano County shows a slightly lower rate in the growth of population, housing and resident workers but a slightly higher rate in the growth of the number of jobs. Napa County consistently shows the lowest rate of growth in population, jobs, housing, and workers.

#### SUPERDISTRICT-LEVEL COMPARISONS

Three sub-county superdistricts show the most significant increase in population, workers and households:

- San Francisco Mission District, which gains 16.1 percent population in Projections 2003 relative to P-2002;
- Central San Jose, which gains 16.0 percent population in P-2003 relative to P-2002; and
- Oakland/Alameda which adds 9.4 percent population in P-2003 relative to P-2002.

The most significant decrease in population, workers and households relative to P-2002 is in Northern Solano County (superdistrict #26).

The four districts with the greatest increase in total jobs, P-2003 relative to P- 2002, are:

- Central San Jose (+30,600 jobs);
- Greater Downtown San Francisco (+15,400 jobs);
- Hayward/San Leandro (+9,900 jobs); and
- Fremont/Union City (+9,100 jobs).

The districts with the largest decrease in total jobs relative to P-2002 are:

- Gilroy/Morgan Hill (-7,000 jobs);
- Central Marin (-6,100 jobs); and
- Southern San Mateo County (-5,800 jobs).

#### **ZONE-LEVEL COMPARISONS**

Of MTC's 1,454 regional travel analysis zones, 446 zones show lower population growth (from P-2002 to P-2003), 13 zones show no change in total population, and 995 zones show an increase in total population growth. A listing of the top twenty and bottom twenty zones in terms of difference in total population, P-2003 less P-2002, is shown in Table E-5. The top zones in terms of reduced population growth are in north Fairfield and Dougherty Valley. The top zones in terms of increased population growth are in Coyote Valley, one of our Golden Triangle zones in Silicon Valley, and a zone in south central San Jose.

Turning to job growth, 543 zones show reduced total employment growth (from P-2002 to P-2003), 7 zones show no change in total employment, and 904 zones show an increase in total employment growth. Table E-6 shows the top twenty and bottom twenty zones in terms of difference in total employment. The top zones in terms of reduced employment growth are the Mountain View Shoreline area (including Moffett Field); the Stanford Industrial Park and the Hacienda Business Park. The top zones in terms of increased employment growth are the Lockheed – Sunnyvale Bayside neighborhood along the Tasman LRT line; one of the San Jose Central Business District (CBD) zones; and a south central San Jose zone.

# Table I: Compare Total Population by MTC 34 Superdistrict & County, 2025 ABAG Projections 2003 compared to Projections 2002

AD	AG Frojections 2003 comp	area to riojec				
			P-2002	P-2003	Difference	% Difference
	Superdistrict	2000	2025	2025	P-03 - P-02	P03 - P02
1	Downtown San Francisco	125,742	139,041	152,599	I 52,599	109.8%
2	Richmond District	206,546	213,995	219,161	219,161	102.4%
3	Mission District	312,465	326,581	379,303	379,303	116.1%
4	Sunset District	131,980	135,582	138,710	138,710	102.3%
5	Daly City/San Bruno	287,439	322,479	333,043	10,564	3.3%
6	San Mateo/Burlingame	201,522	237,819	235,927	-1,892	-0.8%
7	Redwood City/Menlo Park	218,202	253,002	265,453	12,451	4.9%
8	Palo Alto/Los Altos	168,940	190,322	195,639	5,317	2.8%
9	Sunnyvale/Mountain View	225,943	282,614	309,078	26,464	9.4%
10	Saratoga/Cupertino	309,254	352,993	348,417	-4,576	-1.3%
11	Central San Jose	284,443	379,201	439,905	60, <b>704</b>	16.0%
12	Milpitas/East San Jose	381,056	461,982	493,082	31,100	6.7%
13	South San Jose/Almaden	215,121	247,350	245,937	-1,413	-0.6%
14	Gilroy/Morgan Hill	97,828	149,737	143,709	-6,028	-4.0%
15	Livermore/Pleasanton	171,652	265,178	266,314	1,136	0.4%
16	Fremont/Union City	311,764	370,158	386,957	16,799	4.5%
17	Hayward/San Leandro	351,568	396,672	410,183	13,511	3.4%
18	Oakiand/Alameda	454,351	506,115	553,493	47,378	9.4%
19	Berkeley/Albany	! 54,406	176,078	178,831	2,753	1.6%
20	Richmond/El Cerrito	242,439	272,177	290,892	18,715	6.9%
21	Concord/Martinez	221,068	265,632	271,575	5,943	2.2%
22	Walnut Creek/Lamorinda	139,416	163,524	161,288	-2,236	-1.4%
23	Danville/San Ramon	114,919	165,398	158,630	-6,768	-4.1%
24	Antioch/Pittsburg	230,974	343,169	334,006	-9,163	-2.7%
25	Vallejo/Benicia	146,849	177,609	186,279	8,670	4.9%
26	Fairfield/Vacaville	247,693	393,691	370,908	-22,783	-5.8%
27	Napa	87,085	117,144	110,464	-6,680	-5.7%
28	St. Helena/Calistoga	37,194	47,256	40,940	-6,316	-13.4%
29	Petaluma/Sonoma	160,818	199,047	188,724	-10,323	-5.2%
30	Santa Rosa/Sebastopol	219,409	282,096	270,298	-11,798	-4.2%
31	Healdsburg/Cloverdale	78,387	108,657	98,483	-10,174	-9.4%
32	Novato	54,506	67,479	67,568	89	0.1%
33	San Rafael	103,658	117,028	113,879	-3,149	-2.7%
34	Mill Valley/Sausalito	89,125	96,933	98,191	1,258	1.3%
• ·	Bay Area	6,783,762	8,223,739	8,457,866	234,127	2.8%
	San Francisco	776,733	815,199	889,773	74,574	9.1%
	San Mateo	707,163	813,300	834,423	21,123	2.6%
	Santa Clara	1,682,585	2,064,199	2,175,767	111,568	5.4%
	Alameda	1,443,741	1,714,201	1,795,778	81,577	4.8%
	Contra Costa	948,816	1,209,900	1,216,391	6,491	0.5%
	Solano	394,542	571,300	557,187	-14,113	-2.5%
	Napa	124,279	164,400	151,404	-12,996	-7.9%
	Sonoma	458,614	589,800	557,505	-32,295	-5.5%
	Marin	247,289	281,440	279,638	-1,802	-0.6%

			P-2002	P-2003	Difference	% Difference
	Superdistrict	2000	2025	2025	P-03 - P-02	P-03 - P-02
1	Downtown San Francisco	386,582	459,574	474,992	15,418	3.4%
2	Richmond District	81,534	97,975	98,141	166	0.2%
3	Mission District	138,115	179,811	I 78,85 I	-960	-0.5%
4	Sunset District	28,216	33,152	34,063	911	2.7%
5	Daly City/San Bruno	163,295	208,005	215,917	7,912	3.8%
6	San Mateo/Burlingame	111,981	138,551	140,860	2,309	1.7%
7	Redwood City/MenIo Park	120,629	155,434	149,678	-5,756	-3.7%
8	Palo Alto/Los Altos	179,489	199,978	200,189	211	0.1%
9	Sunnyvale/Mountain View	372,465	466,237	460,962	-5,275	-1.1%
10	Saratoga/Cupertino	145,643	183,096	178,214	-4,882	-2.7%
11	Central San Jose	161,034	203,974	234,557	30,583	15.0%
12	Milpitas/East San Jose	120,309	160,685	164,596	3,911	2.4%
13	South San Jose/Almaden	71,208	89,363	94,778	5,415	6.1%
14	Gilroy/Morgan Hill	42,200	92,490	85,508	-6,982	-7.5%
15	Livermore/Pleasanton	119,075	192,821	188,875	-3,946	-2.0%
15	Fremont/Union City	145,557	206,084	215,201	9,117	4.4%
17	Hayward/San Leandro	163,593	200,572	210,460	9,888	4.9%
18	Oakland/Alameda	216,170	287,537	291,806	4,269	1.5%
19	Berkeley/Albany	107,279	127,175	122,270	-4,905	-3.9%
20	Richmond/El Cerrito	76,291	100,545	104,419	3,874	3.9%
21	Concord/Martinez	104,518	133,920	136,454	2,534	1.9%
22	Walnut Creek/Lamorinda	82,823	99,730	96,279	-3,451	-3.5%
23	Danville/San Ramon	53,803	79,013	79,334	321	0.4%
24	Antioch/Pittsburg	43,670	82,273	88,963	6,690	8.1%
25	Vallejo/Benicia	43,881	63,355	66,482	3,127	4.9%
26	Fairfield/Vacaville	79,330	123,934	121,953	-1,981	-1.6%
27	Napa	41,453	64,749	60,302	-4,447	-6.9%
28	St. Helena/Calistoga	25,381	28,300	26,774	-1,526	-5.4%
29	Petaluma/Sonoma	61,085	94,511	94,748	237	0.3%
30	Santa Rosa/Sebastopol	123,534	182,110	179,595	-2,515	-1.4%
31	Healdsburg/Cloverdale	20,602	34,382	29,360	-5,022	-14.6%
32	Novato	27,878	44,780	43,864	-916	-2.0%
33	San Rafael	52,911	68,529	62,457	-6,072	-8.9%
34		42,175	49,964	51,911	1,947	3.9%
	Bay Area	3,753,709	4,932,591	4,982,813	50,222	1.0%
	San Francisco	634,447	770,512	786,047	15,535	2.0%
	San Mateo	395,905	501,990	506,455	4,465	0.9% 1.6%
	Santa Clara	1,092,348	1,395,823	1,418,804 1,028,612	22,981 14,423	1.6%
	Alameda Contra Costa	751,674 361,105	1,014,189 495,481	505,449	9,968	2.0%
	Solano	123,211	187,289	188,435	1,146	0.6%
	Napa	66,834	93,049	87,076	-5,973	-6.4%
	Sonoma	205,221	311,003	303,703	-7,300	-2.3%
	Marin	122,964	163,273	158,232	-5.041	-3.1%
	F 1565 178	122,707			-0,011	-9,170

# Table 2: Total Employment by MTC 34 Superdistrict & County, 2025 ABAG Projections 2003 compared to Projections 2002

200	3 compared to Projections 2002					
		2000	2025	2025	P-03 — P-02	
	Superdistrict	P-2002	P-2003	Difference	% Difference	P-03 - P02
I	Downtown San Francisco	73,148	82,162	91,583	9,421	11.5%
2	Richmond District	134,084	140,604	146,156	5,552	3.9%
3	Mission District	167,499	178,038	205,791	27,753	15.6%
4	Sunset District	70,119	72,898	75,771	2,873	3.9%
5	Daly City/San Bruno	160,520	183,236	189,284	6.048	3.3%
6	San Mateo/Burlingame	121,582	145,539	144,638	-901	-0.6%
7	Redwood City/Menlo Park	121,502	142,115	149,383	7,268	-0.0% 5.1%
					5,596	4.8%
8	Palo Alto/Los Altos	102,012	116,212	121,808		
9	Sunnyvale/Mountain View	143,369	177,911	195,160	17,249	9.7%
10	Saratoga/Cupertino	187,688	216,756	214,532	-2,224	-1.0%
Ш	Central San Jose	147,350	199,292	233,432	34,140	17.1%
12	Milpitas/East San Jose	195,876	244,257	259,651	15,394	6.3%
13	South San Jose/Almaden	132,357	154,392	154,026	-366	-0.2%
14	Gilroy/Morgan Hill	50,419	78,080	75,391	-2,689	-3.4%
15	Livermore/Pleasanton	91,144	162,464	161,842	-622	-0.4%
16	Fremont/Union City	163,435	221,610	228,837	7,227	3.3%
17	Hayward/San Leandro	167,848	216,587	223,239	6,652	3.1%
18	Oakland/Alameda	193,156	241,343	283,536	42,193	17.5%
19	Berkeley/Albany	82,299	104,697	109,950	5,253	5.0%
20	Richmond/El Cerrito	115,013	141,906	152,153	10,247	7.2%
21	Concord/Martinez	123,127	161,321	165,715	4,394	2.7%
22	Walnut Creek/Lamorinda	72,220	93,386	91,806	-1,580	-1.7%
23	Danville/San Ramon	64,440	103,428	99,191	-4,237	-4.1%
_24	Antioch/Pittsburg	109,098	177,459	172,858	-4,601	-2.6%
25	Vallejo/Benicia	67,583	95,702	99,270	3,568	3.7%
26	Fairfield/Vacaville	111,934	206,498	195,329	-11,169	-5.4%
27	Napa	46,778	62,927	59,746	-3,181	-5.1%
28	St. Helena/Calistoga	20,333	25,873	22,054	-3,819	-14.8%
29	Petaluma/Sonoma	83,406	114,185	106,921	-7,264	-6.4%
30	Santa Rosa/Sebastopol	108,429	152,524	146,516	-6,008	-3.9%
31	Healdsburg/Cloverdale	37,472	56,491	51,064	-5,427	-9.6%
32	Novato	32,043	40,733	40,773	40	0.1%
33	San Rafael	58,564	67,914	65,925	-1,989	-2.9%
34	Mill Valley/Sausalito	50,348	56,553	57,199	646	1.1%
	Bay Area	3,605,674	4,635,093	4,790,530	155,437	3.4%
	San Francisco	444,850	473,702	519,301	45,599	9.6%
	San Mateo	403,083	470,890	483,305	12,415	2.6%
	Santa Clara	959,071	1,186,900	1,254,000	67,100	5.7%
	Alameda	697,882	946,701	1,007,404	60,703	6.4%
	Contra Costa	483,898	677,500	681,723	4,223	0.6%
	Solano	179,517	302,200	294,599	-7,601	-2.5%
	Napa	67,111	88,800	81,800	-7,000	-7.9%
	Sonoma	229,307	323,200	304,501	-18,699	-5.8%
	Marin	140,955	165,200	163,897	-1,303	-0.8%

## Table 3: Employed Residents by MTC 34 Superdistrict & County, 2025 ABAG Projections 2003 compared to Projections 2002

con	npared to Projections 2002					
			P-2002	P-2003	Difference	% Difference
	Superdistrict	2000	2025	2025	P-03 P-02	P-03 - P-0.
1	Downtown San Francisco	68,139	75,010	84,571	9,561	12.79
2	Richmond District	102,163	106,289	109,419	3,130	2.99
3	Mission District	110,434	117,143	135,868	18,725	16.0%
4	Sunset District	48,961	50,551	51,973	1,422	2.89
5	Daly City/San Bruno	96,371	106,687	110,648	3,961	3.79
6	San Mateo/Burlingame	80,400	93,749	93,135	-6!4	-0.79
7	Redwood City/Menlo Park	77,333	88,484	92,732	4,248	4.85
8	Palo Alto/Los Altos	68,068	75,091	80,133	5,042	6.7
9	Sunnyvale/Mountain View	88,679	110,664	122,652	11,988	10.8
0	Saratoga/Cupertino	116,842	133,646	132,479	-1,167	-0.9
	Central San Jose	92,049	124,096	142,467	18,371	14.8
12	Milpitas/East San Jose	99,420	123,694	130,153	6,459	5.2
13	South San Jose/Almaden	71,320	82,775	81,847	-928	-1.1
14	Gilroy/Morgan Hill	29,484	45,200	43,593	-1,607	-3.6
15	Livermore/Pleasanton	60,487	93,257	93,440	183	0.2
16	Fremont/Union City	99,510	115,867	120,541	4,674	4.0
17	Hayward/San Leandro	122,610	135,797	140,772	4,975	3.7
18	Oakland/Alameda	172,049	189,836	208,910	19,074	10.0
19	Berkeley/Albany	68,709	76,921	78,539	1,618	2.1
20	Richmond/El Cerrito	85,492	97,457	103,863	6,406	6.6
21	Concord/Martinez	83,827	101,635	103,754	2,119	2.1
22	Walnut Creek/Lamorinda	59,110	70,324	69,559	-765	-1.1
23	Danville/San Ramon	41,471	59,626	58,721	-905	-1.5
24	Antioch/Pittsburg	74,229	114,468	109,012	-5,456	-4.8
25	Vallejo/Benicia	50,961	62,362	64,717	2,355	3.8
26	Fairfield/Vacaville	79,442	128,968	121,734	-7,234	-5.6
27	Napa	31,209	43,007	40,554	-2,453	-5.7
28	St. Helena/Calistoga	14,193	18,443	15,837	-2,606	-14.1
29	Petaluma/Sonoma	60,448	74,834	71,402	-3,432	-4.6
30	Santa Rosa/Sebastopol	82,438	106,350	101,621	-4,729	-4.4
31	Healdsburg/Cloverdale	29,517	41,226	36,978	-4,248	-10.3
32	Novato	21,176	26,231	26,251	20	0.1
33	San Rafael	41,527	46,844	45,502	-1,342	-2.9
34	Mill Valley/Sausalito	37,947	41,455	42,035	580	1.4
	Bay Area	2,466,015	2,977,987	3,065,412	87,425	2.9
	San Francisco	329,697	348,993	381,831	32,838	9.4
	San Mateo	254,104	288,920	296,515	7,595	2.0
	Santa Clara	565,862	695,166	733,324	38,158	5.5
	Alameda	523,365	611,678	642,202	30,524	5.0
	Contra Costa	344,129	443,510	<del>444</del> ,909	1,399	0.3
	Solano	130,403	191,330	186,451	-4,879	-2.0
	Napa	45,402	61,450	56,391	-5,059	-8.
	Sonoma	172,403	222,410	210,001	-12,409	-5.0
	Marin	100.650	114,530	113,788	-742	-0.0

### Table 4: Total Households by MTC 34 Superdistrict & County, 2025 ABAG Projections 2003 compared to Projections 2002

Rank	TAZ1454	Description	County	Year 2000	Year 2025, Proj 2002	Year 2025, Proj 2003	Population Difference
	1270	North Fairfield	Solano	9,746	24,998	16,834	-8,164
2	176	Dougherty Valley	Contra Costa	16,151	37,313	29,214	-8,099
3	1248	West Fairfield	Solano	5,204	14,686	8,821	-5,865
4	1178	Brentwood	Contra Costa	21,608	45,320	39,532	-5,788
5	729	North Livermore	Alameda	465	13,703	8,245	-5,458
6	1290	Rio Vista	Solano	5,733	24,604	19,294	-5,310
7	1177	Byron	Contra Costa	10,882	20,045	14,989	-5,056
8	720	North Livermore	Alameda	3,481	16,776	11,745	-5,031
9	1279	North Vacaville	Solano	3,451	10,996	6,501	-4,495
10	607	Milpitas	Santa Clara	4,382	14,542	10,064	-4,478
11	1238	Mare Island	Solano	149	7,380	3,143	-4,237
12	710	Gilroy	Santa Clara	5,302	11,136	7,099	-4,037
13	1271	Vacaville	Solano	11,959	21,289	17,313	-3,976
14	! 348	South Santa Rosa	Sonoma	7,939	13,314	9,633	-3,681
15	297	Half Moon Bay	San Mateo	4,783	8,839	5,570	-3,269
16	436	Santa Clara	Santa Clara	3,627	7,632	4,414	-3,218
17	1286	Green Valley	Solano	4,206	10,021	6,813	-3,208
18	1297	North Napa	Napa	7,970	13,034	10,040	-2,994
19	1811	Bethel Island	Contra Costa	3,355	8,590	5,640	-2,950
20	712	North Gilroy	Santa Clara	4,293	7,969	5,081	-2,888
1435	578	Central San Jose	Santa Clara	9,263	10,405	12,878	2,473
1436	109	South of Market	San Francisco	506	2,374	4,864	2,490
1437	562	Central San Jose	Santa Clara	4,980	5,933	8,513	2,580
1438	553	Central San Jose	Santa Clara	4,392	7,267	9,861	2,594
1439	17	South of Market	San Francisco	4,126	6,237	8,918	2,681
1440	466	Santa Clara	Santa Clara	3,872	4,282	7,054	2,772
1441	113	Potrero Hill	San Francisco	5,140	5,320	8,202	2,882
! 442	140	Bayview	San Francisco	4,028	4,174	7,076	2,902
1443	778	Central Fremont	Alameda	I 1 <b>,485</b>	12,725	15,632	2,907
444	730	Camp Parks	Alameda	7,600	11,302	14,530	3,228
1445	605	Berryessa	Santa Clara	9,271	10,306	13,613	3,307
1446	568	S. Central San Jose	Santa Clara	7,810	8,685	12,094	3,409
l 447	139	Bayview	San Francisco	5,083	5,212	8,905	3,693
1448	435	North San Jose	Santa Clara	2,053	2,757	6,728	3,971
! <b>449</b>	875	Coliseum BART	Alameda	3,327	3,565	7,859	4,294
1450	142	Bayview	San Francisco	411	487	4,892	4,405
1451	410	Golden Triangle	Santa Clara	3,625	6,510	13,589	7,07 <del>9</del>
1452	563	S. Central San Jose	Santa Clara	8,153	9,437	18,816	9,379
I 453	412	Golden Triangle	Santa Clara	5,914	13,285	22,714	9,429
1454	697	Coyote Valley	Santa Clara	1,783	1,963	14,708	12,745

# Table 5: Largest Differences in Total Population, Projections 2003 vs Projections 2002Top 20 / Bottom 20 MTC Travel Analysis Zones (1454 Zone System)

Rank	TAZ1454	Description	County	Year 2000	Year 2025, Proj 2002	Year 2025, Proj 2003	Employment Difference
1	401	Mountain View Shoreline	Santa Clara	10,222	23,051	12,501	-10,550
2	354	Stanford Industrial	Santa Clara	14,035	20,084	14,649	-5,435
3	742	Hacienda Bus. Park	Alameda	19,435	31,959	27,585	-4,374
4	1292	American Canyon	Napa	5,109	14,989	10,919	-4,070
5	1252	Travis AFB	Solano	14,416	22,726	19,101	-3,625
6	111	East Portrero	San Francisco	6,889	14,874	11,672	-3,202
7	212	South SF	San Mateo	39,734	50,165	47,112	-3,053
8	1341	Rohnert Park	Sonoma	2,258	6,515	3,627	-2,888
9	1429	San Rafael	Marin	6,476	10,020	7,461	-2,559
10	84	Haight-Ashbury	San Francisco	1,262	4,052	1,533	-2,519
11	706	Gilroy	Santa Clara	3,020	9,963	7,539	-2,424
12	1397	Healdsburg	Sonoma	2,969	6,492	4,156	-2,336
13	1238	Mare Island	Solano	4,207	10,087	7,757	-2,330
14	991	West Berkeley	Alameda	18,590	23,820	21,560	-2,260
15	142	Bayview	San Francisco	24,229	29,900	27,645	-2,255
16	1122	Buchanan Field	Contra Costa	20,048	28,832	26,754	-2,078
17	432	Santa Clara	Santa Clara	22,226	28,316	26,326	-1,990
18	768	Newark	Alameda	4,784	8,485	6,520	-1,965
19	730	Camp Parks	Alameda	3,721	13,960	12,059	-1,901
20	964	Alameda West End	Alameda	378	5,330	3,460	-1,870
1435	1189	Antioch Industrial	Contra Costa	5,293	8,409	10,053	1,644
1436	1290	Rio Vista	Solano	2,601	3,766	5,488	1,722
1437	527	Tamien San Jose	Santa Clara	2,479	3,363	5,086	1,723
1438	1361	Downtown Santa Rosa	Sonoma	14,174	18,561	20,315	1,754
1439	234	San Bruno	San Mateo	6,363	8,661	10,436	1,775
1440	856	Bayfair San Leandro	Alameda	1,369	1,658	3,556	I ,898
1441	9	Civic Center	San Francisco	12,490	12,871	! 4,801	1,930
1442	355	Stanford	Santa Clara	36,430	36,636	38,695	2,059
1443	718	East Livermore	Alameda	6,947	9,651	11,828	2,177
1444	1421	North San Rafael	Marin	7,196	6,375	8,572	2,197
1445	1179	Brentwood	Contra Costa	5,467	10,853	13,130	2,277
1446	5	Union Square	San Francisco	34,561	37,833	40,190	2,357
1447	12	South of Market	San Francisco	25,086	28,926	31,403	2,477
1448	1342	Rohnert Park	Sonoma	3,087	2,080	4,906	2,826
1449	407	Golden Triangle	Santa Clara	13,584	14,229	17,158	2,929
1450	801	Union City BART	Alameda	1,815	3,557	6,739	3,182
1451	539	W. Central San Jose	Santa Clara	8,374	10,190	13,684	3,494
1452	563	S. Central San Jose	Santa Clara	11,134	12,359	16,991	4,632
1453	558	•	Santa Clara	20,422	24,615	29,326	4,711
1454	402	Lockheed-Sunnyvale	Santa Clara	11,524	3,066	15,388	12,322

# Table 6: Largest Differences in Total Employment, Projections 2003 vs Projections 2002Top 20 / Bottom 20 MTC Travel Analysis Zones (1454 Zone System)

72030 FEIR Response to Comments

- **21-X** Recommended addition is hereby incorporated into page D-3 of the EIR. See Section 2 of this Final EIR for details.
- **21-Y** Recommended addition is hereby incorporated into page D-4 of the EIR. See Section 2 of this Final EIR for details.
- **21-Z** Recommended addition is hereby incorporated into page D-5 of the EIR. See Section 2 of this Final EIR for details.
- **21-AA** Recommended correction is hereby incorporated into page D-6 of the EIR. See Section 2 of this Final EIR for details.
- **21-BB** Recommended addition is hereby incorporated into page D-6 of the EIR. See Section 2 of this Final EIR for details.
- **21-CC** The Regional Measure 2 Toll Bridge Program projects identified in the Bay Area Region/Multi-County Project # 22241, 22242, 22243, 22244, and 22245---were not available at the time TRANSDEF selected projects for inclusion or exclusion from its transportation network. However, since these projects would not have been coded for modeling purposes, they pose no impacts on the EIR analysis for the Proposed Project and all EIR alternatives, including the TRANSDEF Smart Growth alternative.
- **21-DD** The commentor makes a good suggestion to limit the data levels to three and to carefully choose colors that intuitively connote increases and decreases in density. However, the Draft EIR and the referenced maps are not being re-issued with this Final EIR. These suggestions will be taken into consideration in the future.
- **21-EE** The recommended addition is hereby incorporated into Figure D.2-3 of the EIR. See Section 2 of this Final EIR for details.
- 21-FF Although the TRANSDEF Smart Growth alternative produced better results in some issue areas, it did not produce better results "across the board" as claimed in the comment. The comparison of alternatives identifies the advantages and disadvantages of this alternative. One of the primary reasons that the TRANSDEF Smart Growth alternative performed better in some areas is that it was based on a set of substantially different land use assumptions. Several agencies have commented on these assumptions and on the overall infeasibility of the alternative. For example, by assuming a dramatically larger population in the urban core of San Francisco (substantially beyond the City's Housing Element projections), some transportation impacts were minimized. See Table 3.1-14 in the Draft EIR for a summary of differences in land use assumptions. MTC acknowledges TRANSDEF's desires to incorporate elements of the alternative into the Final Transportation 2030 Plan. Decision makers will consider all comments in their deliberations on the Plan.

#### LETTER 22: BESTPHONES, JANUARY 7, 2005

**22-A** Please refer to response to comment 20-A, 20-B, and 20-C.

#### **22-B** Please refer to response to comment 20-A, 20-B, and 20-C.

**22-C** This program EIR was prepared in compliance with CEQA, and CEQA does not require an economic analysis of environmental effects of the proposed project. The CEQA Guidelines Section 15131(a) clearly states that the "economic or social effects of a project shall not be treated as significant effects on the environment. An EIR may trace a chain of cause and effect from a proposed decision on a project through anticipated economic or social changes resulting from the project to physical changes caused in turn by the economic or social changes. The intermediate economic or social changes need not be analyzed in any detail greater than necessary to trace the chain of cause and effect. The focus of the analysis shall be on the physical changes."

### LETTER 23: TRANSPORTATION LAND USE COALITION (TALC), JANUARY 4, 2005

**23-A** Comment noted. The analysis of the TRANSDEF Smart Growth alternative provides valuable insight into various policy areas that are under active discussion in the transportation and land use arena.

#### LETTER 24: REGIONAL ALLIANCE FOR TRANSIT, JANUARY 5, 2005

- 24-A The Draft EIR includes daily transit ridership projections for each alternative considering all bus and rail systems working together. This information is contained in Table 3.1-4. While transit ridership for different sub modes (e.g., rail, bus, ferry) is available from modeling results of the various alternatives, the Draft EIR presents information at a regional scale for transit; and therefore it is not included in the program EIR. MTC will be providing some of this information in a separate response to TRANSDEF as required by the Settlement Agreement.
- **24-B** The Draft EIR explains the criteria used for evaluation of the transportation impacts of transit and highway projects. MTC does not apply different weights to travel time savings for highway or transit users. When considering the benefits of the proposed project in comparison to other alternatives involving new transit and highway investments, the Commission takes into account a wide range of information such as that examined in the Draft EIR and input from the public. The analysis of specific locations for highway delays and comparisons of these locations can be extracted from the travel modeling data, but this level of investigation is beyond the regional scope of the program EIR.
- **24-C** Please refer to response to comment 22-C. CEQA clearly states that the focus of the EIR analysis shall be on the physical changes. Thus, the health benefits of residents of each of the EIR alternatives are not quantified in the EIR. However, the air quality chapter analyzes pollutants for which federal and state health based standards have been set, and it can generally be assumed that alternatives that have lower automobile emissions will have correspondingly higher health benefits for Bay Area residents.
- **24-D** See response to comment 24-A.

**TRANSPORTATION 2035 PLAN** 

# FINAL ENVIRONMENTAL IMPACT REPORT

STATE CLEARINGHOUSE NO. 2008022101

Prepared for

### Metropolitan Transportation Commission

by

DYETT & BHATIA Urban and Regional Planners

In association with

Environmental Science Associates • Environmental Consultants

April 2009



### Appendix A: Findings and Facts in Support of Findings

### Appendix A: Findings and Facts in Support of Findings

#### INTRODUCTION

#### **ROLE OF THE FINDINGS**

The following findings are hereby adopted by the Metropolitan Transportation Commission (MTC) pursuant to the requirements of the California Environmental Quality Act, California Public Resources Sections 21000 et seq., ("CEQA"), and the Guidelines for Implementation of CEQA, Title 14, California Code of Regulations Section 15000 et seq. (the "CEQA Guidelines").

These Findings and Facts in Support of Findings relate to the approval of the Transportation 2035 Plan for the San Francisco Bay Area (the "Plan" or "project"). MTC is the Lead Agency for the project.

The Findings state MTC's conclusions regarding the significance of the potential environmental impacts of the Transportation 2035 Plan after all feasible mitigation measures have been adopted. These findings have been prepared to comply with the requirements of CEQA and the CEQA Guidelines and are based on information in the Draft and Final Environmental Impact Report (EIR) for the project and on all other relevant information contained in the administrative record for the Project.

CEQA requires agencies to identify mitigation measures that would avoid or substantially lessen a project's significant impacts or potential significant impacts if such measures are feasible. The mitigation measures identified in the Final EIR mitigate the potential significant impacts of the Plan, to the extent feasible, as described in the Final EIR. All mitigation measures identified in the Final EIR (as listed in Table ES-1 of the Draft EIR) that are within MTC's authority to impose are hereby adopted by MTC. For project-level mitigation measures that are applicable to individual projects envisioned under the Transportation 2035 Plan, project sponsors are required to conduct environmental assessment in accordance with CEQA and/or NEPA since these individual projects have not been fully designed and analyzed yet. MTC will ensure implementation of these measures by coordinating with project sponsors. Monitoring of these mitigation measures will occur, as described in the Mitigation Monitoring Program (Appendix C).

By adopting the mitigation measures listed in the EIR and establishing a Mitigation Monitoring Program to ensure implementation of these mitigation measures, MTC will ensure that the corresponding significant impacts are avoided or reduced to the maximum extent feasible. Specific development projects that have the potential for significant impacts will be subject to separate CEQA and/or NEPA review, including consideration of project-specific mitigation measures.

Project sponsors will be required to adopt feasible mitigation measures for significant impacts that are identified in subsequent project-level environmental review documents and must prepare and adopt individual mitigation monitoring programs to comply with these measures. Subsequent environmental review for specific projects identified in the Plan may tier off the programmatic analysis or incorporate information and analysis from this analysis by reference (CEQA Guidelines Sections 15150, 15152, and 15168). In order to tier off the program EIR for the Plan,

however, the project-specific EIR must incorporate the mitigation measures set forth therein (CEQA Guidelines Section 15168, subd. (c)(3)). This consistency requirement will help to ensure that project sponsors will adopt and implement the recommended mitigation measures.

The Statement of Overriding Considerations, included in Appendix B of this document, explains MTC's reasons for approving the Transportation 2035 Plan, despite the fact that the Transportation 2035 Plan will have significant impacts on the environment.

#### **CEQA REQUIREMENTS**

The EIR identifies significant effects on the environment, which may occur as a result of the projects in the Transportation 2035 Plan.

Public Resources Code Section 21002 provides that "public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would *substantially lessen* the significant environmental effects of such projects[.]" (Emphasis added.) The same statute states that the procedures required by CEQA "are intended to assist public agencies in systematically identifying both the significant effects of proposed projects and the feasible alternatives or feasible mitigation measures which will *avoid or substantially lessen* such significant effects." (Emphasis added.) Section 21002 goes on to state that "in the event [that] specific economic, social, or other conditions make infeasible such project alternatives or such mitigation measures, individual projects may be approved in spite of one or more significant effects thereof." (Pub. Resources Code, Section 21002.)

The mandate and principles announced in Public Resources Code Section 21002 are implemented, in part, through the requirement that agencies must adopt findings before approving projects for which EIRs are required. (See Pub. Resources Code, Section 21081, subd. (a); CEQA Guidelines, Section 15091, subd. (a).) Specifically, Section 15091, subdivision (a) of the CEQA Guidelines provide as follows:

(a) No public agency shall approve or carry out a project for which an EIR has been completed which identifies one or more significant environmental effects of the project unless the public agency makes one or more written findings for each of those significant effects, accompanied by a brief explanation of the rationale for each finding. The findings are:

1. Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant environmental effect as identified in the EIR.

#### This finding shall be referred to as "Finding (1)."

2. Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency.

This finding shall be referred to as "Finding (2)."

3. Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers make infeasible the mitigation measures or project alternatives identified in Final EIR.

#### This finding shall be referred to as "Finding (3)."

Thus, for each significant environmental effect identified in an EIR for a proposed project, the approving agency must issue a written finding reaching one or more of the three permissible conclusions described above.

CEQA requires that the lead agency adopt mitigation measures or alternatives, where feasible, to substantially lessen or avoid significant environmental impacts that would otherwise occur. Project modifications or alternatives are not required, however, where such changes are infeasible or where the responsibility for modifying the project lies with some other agency. (CEQA Guide-lines, Section 15091, subd. (a),(b).)

Public Resources Code Section 21061.1 defines "feasible" to mean "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social and technological factors." CEQA Guidelines Section 15364 adds another factor: "legal" considerations. (See also *Citizens of Goleta Valley v. Board of Supervisors (Goleta II)* (1990) 52 Cal.3d 553, 565 (concluding, whether project applicant owned alternative site for project was an appropriate legal and economic factor to consider)) Moreover, judicial decisions have held "desirability" is also an appropriate consideration. (*City of Del Mar v. City of San Diego* (1982) 133 Cal.App.3d 410, 417 ("feasibility" also encompasses desirability to the extent that desirability is based on a reasonable balancing of the relevant economic, environmental, social and technological factors and whether a particular alternative or mitigation measure promotes the underlying goals and objectives of a project); see also *Sequoyah Hills Homeowners Assn. v. City of Oakland* (1993) 23 Cal.App.4th 704, 715 (same))

With respect to a project for which significant impacts are not avoided or substantially lessened, a public agency, after adopting proper findings, may nevertheless approve the project if the agency first adopts a statement of overriding considerations setting forth the specific reasons why the agency found that the project's "benefits" rendered "acceptable" its "unavoidable adverse environmental effects." (CEQA Guidelines, Section 15093, 15043, subd. (b); see also Pub. Resources Code, Section 21081, subd. (b).) The California Supreme Court has stated, "[t]he wisdom of approving... any development project, a delicate task which requires a balancing of interests, is necessarily left to the sound discretion of the local officials and their constituents who are responsible for such decisions. The law as we interpret and apply it simply requires that those decisions be informed, and therefore balanced." (*Goleta II*, 52 Cal.3d at p. 576.)

The CEQA Guidelines do not define the difference between "avoiding" a significant environmental effect and merely "substantially lessening" such an effect. MTC must therefore glean the meaning of these terms from the other contexts in which the terms are used. Public Resources Code Section 21081, on which CEQA Guidelines Section 15091 is based, uses the term "mitigate" rather than "substantially lessen." The CEQA Guidelines therefore equate "mitigating" with "substantially lessening." Such an understanding of the statutory term is consistent with the policies underlying CEQA, which include the policy that "public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects." (Pub. Resources Code, Section 21002.)

For purposes of these findings, the term "avoid" refers to the effectiveness of one or more mitigation measures to reduce an otherwise significant effect to a less than significant level. In contrast, the term "substantially lessen" refers to the effectiveness of such measure or measures to substantially reduce the severity of a significant effect, but not to reduce that effect to a less than significant level. These interpretations appear to be mandated by the holding in *Laurel Hills Homeowners Association v. City Council* (1978) 83 Cal.App.3d 515, 519-521, in which the Court of Appeal held that an agency had satisfied its obligation to substantially lessen or avoid significant effects by adopting numerous mitigation measures, not all of which rendered the significant impacts in question less than significant.

Although CEQA Guidelines Section 15091 requires only that approving agencies specify that a particular significant effect is "avoid[ed] or substantially lessen[ed]," these findings, for purposes of clarity, in each case will specify whether the effect in question has been reduced to a less than significant level, or has simply been substantially lessened but remains potentially significant. Moreover, although Section 15091, read literally, does not require findings to address environmental effects that an EIR identifies as merely "potentially significant," these findings will nevertheless fully account for all such effects identified in the Final EIR.

These findings constitute MTC's best efforts to set forth the evidentiary and policy bases for its decision to approve the Project in a manner consistent with the requirements of CEQA. To the extent that these findings conclude that various proposed mitigation measures outlined in the Final EIR are feasible, within its responsibility and jurisdiction, and have not been modified, superseded or withdrawn, MTC hereby binds itself to implement these measures. These findings, in other words, are not merely informational, but rather constitute a binding set of obligations that will come into effect when the MTC adopts a resolution approving the Project. As such the mitigation measures adopted by MTC satisfy the requirements of CEQA.

The Facts in Support of Findings in the following sections state MTC's reasons for making each finding and the rationale connecting the evidence to MTC's conclusions. All records and materials constituting the record of the proceedings upon which these findings are made are located at the offices of the Metropolitan Transportation Commission, 101 Eighth Street, Oakland, California, 94607.

#### SCOPE OF THE ENVIRONMENTAL ANALYSIS

This program EIR analyzes the potential significant adverse effects of the adoption and implementation of the Transportation 2035 Plan. This assessment, in compliance with CEQA, is designed to inform decision-makers, other responsible agencies and the general public of the environmental consequences of the proposed project. CEQA provides that a program EIR should focus on the secondary effects that can be expected to follow its adoption, but need not be as detailed as an EIR on the specific construction projects that might follow. In accordance with CEQA, the Transportation 2035 Plan EIR identifies regional effects of the implementation of projects, which could follow adoption of the Transportation 2035 Plan. The Transportation 2035 Plan represents MTC's transportation policy and action statement as to how to approach the region's transportation needs over the next 25 years. The Transportation 2035 Plan's assessment of future travel activity and use of the transportation system are based on the most recent land use assumptions and growth projections of the Association of Bay Area Governments (ABAG) that were available at the time of the EIR preparation (*Projections 2007*).

#### **ORGANIZATION OF THIS APPENDIX**

This Appendix identifies the findings and facts in support of findings for each potentially significant impact in the order they appear in the Draft EIR. Next, it summarizes the alternatives discussed in the EIR and makes findings with respect to their feasibility and whether the alternatives would lessen the significant environmental effects of the project. This Appendix concludes with a finding on the independent review and analysis of the EIR.

#### IMPACT FINDINGS AND FACTS IN SUPPORT OF FINDINGS

The following subsections list each significant or potentially significant environmental impact by issue area in the order they appear in the Draft EIR, the mitigation measures identified for each impact in the EIR, the CEQA finding or findings applied by MTC as described above, and the facts in support of each finding.

MTC has determined that the adoption of feasible mitigation measures, alternatives, and proposals incorporated into the Transportation 2035 Plan will reduce all of the following impacts to some extent, but for some not to a level that is deemed "less than significant." The Statement of Overriding Considerations set forth in Appendix B of this document contains additional information explaining the reasons for MTC's decision to approve the project despite potentially significant environmental effects that MTC cannot mitigate to less-than-significant levels, and is hereby incorporated by reference.

#### TRANSPORTATION

#### **Cumulative Impact**

2.1-2 Vehicle miles traveled at Level of Service F would increase for both freeways and expressways and arterial facilities when compared to existing conditions. (Draft EIR p. 2.1-19)

#### **Mitigation Measures**

**2.1(a)** MTC, ABAG, BCDC and BAAQMD—as represented through the Joint Policy Committee (JPC) which coordinates the regional planning efforts of the four agencies—shall work to leverage existing funds (including the \$2.2 billion in funds committed in the proposed Transportation 2035 Plan for the Transportation for Livable Communities Program) and seek additional funds to provide financial incentives to local governments that volunteered to designate their communities as Priority Development Areas (PDAs) through the FOCUS program and commit to build higher density residential and mixed use development near transit.

**2.1(b)** MTC, in partnership with ABAG, BCDC, BAAQMD, local governments, and employers who would like to participate, will seek opportunities to conduct research on and promote value pricing of parking and other innovative parking strategies, for example:

• Employer parking "cash out" programs, which allow employees to forego a parking spot in favor of cash or a subsidized transit pass;

- Residential parking "opt-out" programs, which reduce city parking requirements in favor of developer funded cash to residents and/or transit passes, carshare membership, bicycle rentals, or alternative modes;
- Local parking self-financing programs, which price parking to fund transit passes, alternative modes, and/or provide cash directly to workers and residents;
- "Green certification" of local parking policy regulations aimed at reducing vehicle miles traveled; and
- Technical assistance programs to remove barriers that prevent local governments from implementing parking pricing programs.

**2.1(c)** MTC shall advocate to State and federal legislators for new incentive funding for local governments to take steps to encourage higher density and mixed use developments near transit, including strategies such as (a) revising land use plans and zoning codes to remove barriers that may prevent such development; or (b) providing incentives to developers through density bonuses or expedited development review.

#### Impact Conclusion

The overall cumulative impact will remain significant and unavoidable after the incorporation of feasible mitigation. The project's contribution, however, is not cumulatively considerable.

#### Findings

Changes or alterations have been required in, or incorporated into, the project, that avoid or substantially lessen the project's contribution to the overall significant cumulative impact (Finding (1)). The identified mitigation measures are partially within the responsibility and jurisdiction of MTC and partially within the responsibility and jurisdiction of other public agencies: those agencies can and should adopt the recommended measures (Finding (2)). Because the Plan's incremental contribution to the cumulatively significant impact is not cumulatively considerable, these changes were not required under CEQA, but were provided as a supplemental good faith effort to reduce the overall significant cumulative impact.

#### Facts in Support of Findings

- A. Cumulative population growth and development, regardless of the proposed Project, will occur in the region and will result in a substantial contribution to the identified cumulative impact (Draft EIR, p. 2.1-10, and Chapter 2.12: Growth-inducing Impacts). Implementation of the proposed Transportation 2035 Plan itself will not result in a considerable contribution to this cumulative impact because the comparison between the proposed project and the No Project alternative future condition (Draft EIR, p.2.1-20) shows a dramatic decrease (41 percent) in vehicle miles traveled at LOS F for the proposed Project, roadway performance and congestion would be much worse than if the proposed Project were implemented. The Project's contribution to the cumulative effect is thus beneficial, rather than detrimental.
- B. Because the Plan's contribution to the cumulative impact is not considerable, the mitigation measures provided were not required according to the EIR analysis, but rather pro-

vided as a supplementary good faith effort to further reduce the overall cumulative impact. (Draft EIR, p. 2.1-20)

- C. Proposed mitigation measures, along with conformity with existing federal, State, and local regulations, are expected to reduce the overall cumulative effect, as well as the Plan's contribution to the overall cumulative effect, by providing incentives to travel by modes other than automobile, and potentially providing funding for local governments to create further incentives.
- D. As the transportation planning, coordinating, and financing agency for the nine-county San Francisco Bay Area, MTC functions as both the regional transportation planning agency—a state designation—and, for federal purposes, as the region's metropolitan planning organization (MPO). As such, it is responsible for regularly updating the Regional Transportation Plan, and for screening requests from local agencies for state and federal grants for transportation projects to determine their compatibility with the plan. The proposed mitigation measures are within MTC's authority and regional planning role, and capitalize on the coordination already underway through the Joint Policy Committee (which is comprised of board members from MTC, ABAG, Bay Area Air Quality Management District, and Bay Conservation and Development Commission).
- E. In accordance with the Mitigation Monitoring Program, MTC will ensure implementation of program-level mitigation measures that help to reduce the identified cumulative environmental impact.

#### **AIR QUALITY**

#### Impact

2.2-1 Construction-related emissions of criteria pollutants could increase due to the construction of projects in the proposed Project. (Draft EIR p. 2.2-17)

#### **Mitigation Measures**

2.2(a) As project sponsors prepare the environmental review document for their individual project pursuant to CEQA/NEPA and prior to environmental certification, project sponsors shall consider adopting appropriate measures that would minimize or eliminate cumulatively considerable environmental impacts pursuant to CEQA/NEPA. MTC shall be provided with status reports of compliance with mitigation measures pursuant to MTC Resolution 1481, Revised. Mitigation measures to reduce construction-related air quality impacts that shall be considered by project sponsors and decision-makers may include, but are not limited to, those described below.

Typical mitigation measures that can be considered by project sponsors include:

- Apply water or dust suppressants to exposed earth surfaces to control emissions at least twice daily;
- All trucks hauling dirt, sand, soil, or other loose materials off-site shall be covered or wetted or shall maintain at least two feet of freeboard (i.e. minimum vertical distance between the top of the load and the top of the trailer);
- All excavating and grading activities shall cease during periods of high winds;

#### Transportation 2035 Plan Final Environmental Impact Report

- All construction roads that have high traffic volumes, shall be surfaced with base material or decomposed granite, or shall be paved or otherwise be stabilized;
- Public streets shall be cleaned, swept or scraped at frequent intervals or at least three times a week or once a day if visible soil material has been carried onto adjacent public roads (no mechanical "dry" sweeping shall be allowed);
- Construction equipment shall be visually inspected prior to leaving the site and loose direct dirt shall be washed off with wheel washers as necessary;
- Paving or water or non-toxic soil stabilizers shall be applied as needed to reduce off-site transport of fugitive dust from all unpaved access roads, parking and staging areas and other unpaved surfaces;
- Traffic speeds on all unpaved surfaces shall not exceed 15 mph;
- Low sulfur or other alternative fuels shall be used in construction equipment where feasible;
- Idling time of construction vehicles and equipment shall not exceed five (5) minutes;
- Construction vehicles shall be properly maintained and tuned;
- Deliveries related to construction activities that affect traffic flow shall be scheduled during off-peak hours (e.g., 10:00 A.M. and 3:00 P.M.) and coordinated to achieve consolidated truck trips. When the movement of construction materials and/or equipment impacts traffic flow, temporary traffic control shall be provided to improve traffic flow (e.g., flag person);
- To the extent possible, construction activity shall utilize electricity from power poles rather than temporary diesel power generators and/or gasoline power generators;
- Hydroseed or apply non-toxic soil stabilizers to inactive construction areas;
- Install sandbags or other erosion control measures to prevent silt run-off to public roadways;
- Install wind breaks, or plant trees/vegetative wind breaks at windward side(s) of construction areas;
- Maintain on-site truck loading zones;
- Configure on-site construction parking to minimize traffic interference and to ensure emergency vehicle access;
- Provide temporary traffic control during all phases of construction activities to improve traffic flow;
- During construction, replace ground cover in disturbed areas as quickly as possible;
- During the period of construction, install wheel washers where vehicles enter and exit unpaved roads onto paved roads, or wash off trucks and any equipment leaving the site each trip;
- Employ a balanced cut/fill ration on construction sites, thus reducing haul truck trip emissions;
- Construction sites/site operator shall comply with Bay Area Air Quality Management District Regulation 6, Rule 1- Particulate Matter;
- Use an emissions calculator in the planning of every construction project that uses the proposed equipment fleet and hours of use to project reactive organic gases, nitrogen oxides, par-

ticulate matter, and carbon dioxide emissions, then quantify the reductions achievable through the use of cleaner/newer equipment; and

• All off-road construction vehicles must be alternative fuel vehicles, or diesel-powered vehicles with the most recent CARB-certified tier or better engines or retrofitted/repowered to meet equivalent emissions standards.

#### Impact Conclusion

Because the program-level review for the Plan cannot determine the feasibility and efficacy of the mitigation measures for specific projects, the impact may remain significant and unavoidable after implementing feasible mitigation measures.

#### Findings

Changes or alterations have been required in, or incorporated into, the project that reduce the impact to less than significant (Finding (1)). The identified mitigation measures are within the responsibility and jurisdiction of other public agencies, and not MTC, and those agencies can and should adopt the measures (Finding (2)). Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers make infeasible further mitigation (Finding (3)).

#### Facts in Support of Findings

- A. The mitigation measures address site-specific factors that must be considered for each individual transportation project, rather than within the overall Transportation 2035 Plan. Therefore, implementation of the identified mitigation measures relies on the efforts of other agencies, namely the project sponsor(s) (lead agency) who will be responsible for complying with CEQA and NEPA, if applicable, for individual projects. MTC will use the Mitigation Monitoring Program to help to ensure that proposed mitigation measures are incorporated into the project environmental review documents.
- B. The recommended mitigation measures would be effective in reducing the impacts identified at the program level. Specific mitigation measures that meet or exceed the requirements of these recommended measures will have to be adopted and implemented by project sponsors for impacts identified during the environmental evaluation of individual projects, particularly as they relate to details about the project location. This future project-level environmental review will determine whether impacts can be mitigated to a less-than-significant level. In order for project-level environmental review to tier off the program EIR for the Plan, however, it must incorporate the mitigation measures set forth therein (CEQA Guidelines Section 15168, subd. (c)(3)). Thus, the use of this EIR by project sponsors in preparing environmental documents for specific projects will help ensure that project-specific mitigation measures will be implemented.
- C. The nature of the program-level evaluation of impacts is such that not enough is known about the specific project-level conditions to determine if the proposed mitigation measures will in fact be feasible and effective. Social, economic, legal, and technological conditions related to the ultimate design of individual projects will be factors in the feasibility of proposed mitigation measures at the project level. In particular, because the location and duration of specific construction projects is still unknown, and yet localized construction-related air quality impacts are potentially disruptive and unpleasant for house-

holds, businesses, and even communities, this analysis cannot be sure of the ultimate effectiveness of the proposed mitigation measures.

#### **Cumulative Impact**

2.2-3 Implementation of Transportation 2035 Plan projects, combined with projected regional growth, would result in increased emissions of PM10 and PM2.5 over existing conditions. (Draft EIR, p. 2.2-21)

#### **Mitigation Measures**

**2.2(b)** MTC and BAAQMD, in partnership with ARB and other partners who would like to participate, shall work to leverage existing air quality and transportation funds and seek additional funds to continue to implement the BAAQMD's Lower-Emission School Bus Program (LESBP) to retrofit older diesel school buses with emission control devices and replace older school buses with lower-emission school buses, and to develop and implement other similar programs aimed at retrofits and replacements of heavy duty fleet vehicles.

**2.2(c)** MTC and BAAQMD, in partnership with the Port of Oakland, ARB, and other partners who would like to participate, shall work together to identify, prioritize and implement actions beyond those identified in the Statewide Goods Movement Emission Reduction Plan to reduce diesel PM and other air emissions.

**2.2(d)** MTC and BAAQMD, in partnership with the Port of Oakland, ARB, and other partners who would like to participate, shall work together to secure incentive funding that may be available through the Carl Moyer Memorial Air Quality Standards Attainment Program to reduce portrelated emissions.

**2.2(e)** MTC and BAAQMD, in partnership with the Port of Oakland, ARB, and other partners who would like to participate, shall work together to secure Proposition 1B Goods Movement Emission Reduction Program funds to invest in Bay Area related programs. These funds directly support early and accelerated diesel PM reduction programs and can help ease the transition into compliance with adopted and proposed ARB regulations.

**2.2(f)** MTC and BAAQMD, in partnership with the Port of Oakland, ARB, and other partners who would like to participate, shall work together to develop and seek resources for the San Francisco Bay Area Green Ports Initiative, which is a program to reduce air pollution from trucks, ships and other equipment associated with Bay Area port operations.

#### Impact Conclusion

The overall cumulative impact will remain significant and unavoidable after MTC's incorporation of feasible mitigation. The project's contribution, however, is not cumulatively considerable.

#### Findings

Changes or alterations have been required in, or incorporated into, the project, that avoid or substantially lessen the project's contribution to the overall significant cumulative impact (Finding (1)). The identified mitigation measures are partially within the responsibility and jurisdiction of MTC and partially within the responsibility and jurisdiction of other public agencies: those agencies can and should adopt the recommended measures (Finding (2)). Because the Plan's incremental contribution to the cumulatively significant impact is not cumulatively considerable, these changes were not required under CEQA, but were provided as supplemental good faith effort to reduce the overall significant cumulative impact.

#### Facts in Support of Findings

- A. Cumulative population growth and development, regardless of the proposed Project, will occur in the region and will result in a substantial contribution to the identified cumulative impact. Implementation of the proposed Transportation 2035 Plan itself will not result in a considerable contribution to this cumulative impact because the comparison of the proposed Project with the No Project future alternative shows that under the proposed Project future emissions of particulate matter decrease. This suggests that the increase in particulate matter emissions from existing to future conditions is a result of expected growth in vehicle miles traveled as a result of overall regional population and employment growth, which would occur with or without the Plan.
- B. Existing regulatory efforts at the State level have proven effective in reducing emissions per vehicle mile (Draft EIR, p. 2.2-21 cites stringent emissions controls for new diesel engines). The proposed mitigation measures will be effective because they are designed to enhance the effectiveness of existing regulations, and to facilitate the swifter adoption of better technologies for reducing emissions.
- C. These proposed mitigation measures, along with conformity with existing federal, State, and local regulations, are expected to reduce the overall cumulative effect, as well as the Plan's contribution to the overall cumulative effect.
- D. As the transportation planning, coordinating, and financing agency for the nine-county San Francisco Bay Area, MTC functions as both the regional transportation planning agency—a state designation—and, for federal purposes, as the region's metropolitan planning organization (MPO). As such, it is responsible for regularly updating the Regional Transportation Plan and for screening requests from local agencies for state and federal grants for transportation projects to determine their compatibility with the plan. The proposed mitigation measures are within MTC's authority and regional planning role, and capitalize on the coordination already underway through the Joint Policy Committee (which is comprised of board members from MTC, ABAG, Bay Area Air Quality Management District, and Bay Conservation and Development Commission).
- E. In accordance with the Mitigation Monitoring Program, MTC will ensure implementation of program-level mitigation measures that are within its responsibility and jurisdiction and will encourage project sponsors to implement the recommended mitigation measures that help to reduce the identified cumulative environmental impact.

#### LAND USE

#### Impact

2.3-1 Implementation of the proposed Transportation 2035 Plan could convert farmland, including prime agricultural land designated by the State of California, to transportation use. (Draft EIR, p. 2.3-27)

#### **Mitigation Measures**

**2.3(a)** As project sponsors prepare the environmental review document for their individual project pursuant to CEQA/NEPA and prior to environmental certification, project sponsors shall consider adopting appropriate measures that would minimize or eliminate cumulatively considerable environmental impacts pursuant to CEQA/NEPA. MTC shall be provided with status reports of compliance with mitigation measures pursuant to MTC Resolution 1481, Revised. Mitigation measures to reduce impacts on farmlands that shall be considered by project sponsors and decision-makers may include, but are not limited to, those described below.

- Corridor realignment, where feasible, to avoid farmland, especially Prime Farmland;
- Conservation easements on land at least equal in quality and size as partial compensation for the direct loss of agricultural land;
- Abiding by the proper notification provisions of the Williamson Act when it appears that land enrolled in a Williamson Act contract may be required for a public use, is acquired, the original transportation improvement for the acquisition is changed, or the land acquired is not used for the improvement;
- If a Williamson Act contract is terminated, the Department of Conservation recommends a ratio greater than 1:1 of land equal in quality be set aside in a conservation easement;
- Instituting new protection of farmland in the project area or elsewhere in the County through the use of less than permanent long-term restrictions on use, such as 20-year Farmland Security Zone contracts (Government Code Section 51296 et seq.) or 10-year Williamson Act contracts (Government Code Section 51200 et seq.);
- Mitigation fees that support the commercial viability of the remaining agricultural land in the project area, County, or region through a mitigation bank that invests in agricultural infrastructure, water supplies, marketing, etc;
- Minimize severance of agricultural land by constructing underpasses and overpasses at reasonable intervals to provide property access;
- Agricultural enhancement investments such as supporting farmer education on organic and sustainable practices, assisting with organic soil amendments for improved production, and upgrading irrigation systems for water conservation;
- Berms, buffer zones, setbacks, and fencing to reduce use conflicts between transportation facilities and farming uses and to protect the functions of farmland; and
- Other conservation tools available from the California Department of Conservation's Division of Land Resource Protection.

#### **Impact Conclusion**

Because the program-level review for the Plan cannot determine the feasibility and efficacy of the mitigation measures for specific projects, the impact may remain significant and unavoidable after implementing feasible mitigation measures.

#### Findings

The identified mitigation measures are within the responsibility and jurisdiction of other public agencies, and not MTC, and those agencies can and should adopt the measures (Finding (2)). Specific economic, legal, social, technological, or other considerations make infeasible further mitigation measures that would reduce the impact to a less-than-significant level (Finding (3)).

#### Facts in Support of Findings

- A. The potential conversion of farmland is a conservative estimate. The EIR land use analysis took a "worst case" approach (Draft EIR, page 2.3-25), meaning that it assumed that farmland would be converted to transportation uses within a substantial swath along proposed transportation projects. In doing so, the severity of the potential impacts may be overstated.
- B. Due to the programmatic level of analysis in the EIR and lack of project-specific plans, it is not possible to define the exact extent of potential impact, so it is not possible to ascertain with certainty whether the identified mitigation measures for these impacts will reduce impacts to levels considered "not significant." However, it is likely that, with proper design and planning, many of the identified impacts can be avoided or minimized.
- C. The mitigation measures address site-specific factors that must be considered for each individual transportation project, rather than within the overall Transportation 2035 Plan. Therefore, implementation of the identified mitigation measures relies on the efforts of other agencies, namely the project sponsor(s) (lead agency) who will be responsible for complying with CEQA and NEPA, if applicable, for individual projects. MTC will use the Mitigation Monitoring Program to help to ensure that proposed mitigation measures are incorporated into the project environmental review documents.
- D. The mitigation measures are appropriate for reducing the impacts identified at the program level. Specific mitigation measures that meet or exceed the requirements of these proposed measures will have to be implemented by project sponsors for impacts identified during the environmental evaluation of individual projects, particularly as they relate to details about the project location. This future project-level environmental review will determine whether impacts can be mitigated to a less-than-significant level. In order for project-level environmental review to tier off the program EIR for the Plan, however, it must incorporate the mitigation measures set forth therein (CEQA Guidelines Section 15168, subd. (c)(3)). Thus, the use of this EIR by project sponsors in preparing environmental documents for specific projects will help ensure that project-specific mitigation measures will be implemented.
- E. The nature of the program-level evaluation of impacts is such that not enough is known about the specific project-level conditions to determine if the proposed mitigation measures will in fact be feasible and effective. Social, economic, legal, and technological conditions related to the ultimate design of individual projects will be factors in the feasibility of proposed mitigation measures at the project level. In particular, because the location of specific construction projects in relation to Prime and Important farmlands is still unknown, this analysis cannot be sure of the ultimate effectiveness of the proposed mitigation measures.

#### Impact

### 2.3-2 Implementation of the proposed Transportation 2035 Plan could disrupt or displace existing land uses, neighborhoods, and communities in the short term. (Draft EIR, p. 2.3-31)

#### **Mitigation Measures**

**2.3(b)** As project sponsors prepare the environmental review document for their individual project pursuant to CEQA/NEPA and prior to environmental certification, project sponsors shall consider adopting appropriate measures that would minimize or eliminate cumulatively considerable environmental impacts pursuant to CEQA/NEPA. MTC shall be provided with status reports of compliance with mitigation measures pursuant to MTC Resolution 1481, Revised. Mitigation measures to reduce short-term (often construction-related) disruption or displacement of existing land uses, specifically residential, commercial, or urban open space impacts that shall be considered by project sponsors and decision-makers may include, but are not limited to, those described below.

- Berms and fencing to reduce conflicts between transportation facilities and existing uses.
- Regulate construction operations on existing facilities to minimize traffic disruptions and detours, and to maintain safe traffic operations.
- Ensure construction operations are limited to regular business hours where feasible.
- Control construction dust and noise.
- Control erosion and sediment transport in stormwater runoff from construction sites.

Additional recommended mitigation measures are listed under the short-term constructionrelated impact in *Chapter 2.2: Air Quality*, and are included here by reference. The extent of this impact will depend on the final design and the phasing of implementation. (Draft EIR, p. 2.3-34)

#### **Impact** Conclusion

Because the program-level review for the Plan cannot determine the feasibility and efficacy of the mitigation measures for specific projects, the impact may remain significant and unavoidable after implementing feasible mitigation measures.

#### Findings

Changes or alterations have been required in, or incorporated into, the project that may reduce the impact to a level that is less than significant (Finding (1)). The identified mitigation measures are within the responsibility and jurisdiction of other public agencies, and not MTC, and those agencies can and should adopt the measures (Finding (2)). Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers make infeasible further mitigation that would reduce the impact to a less than significant level (Finding (3)).

# Facts in Support of Findings

- A. The potential land use disturbances are conservative estimates. The EIR land use analysis took a "worst case" approach (Draft EIR, page 2.3-25), meaning that it assumed that land uses within a substantial swath along proposed transportation projects may be impacted. In doing so, the severity of the potential impacts may be overstated.
- B. Due to the programmatic level of analysis in the EIR and lack of project-specific plans, it is not possible to define the exact extent of potential impact, so it is not possible to ascertain with certainty whether the identified recommended mitigation measures for these impacts will reduce impacts to levels considered "not significant." However, it is likely that, with proper design and planning, many of the identified impacts can be avoided or minimized.
- C. The recommended mitigation measures address site-specific factors that must be considered for each individual transportation project, rather than within the overall Transportation 2035 Plan. Therefore, implementation of the identified mitigation measures relies on the efforts of other agencies, namely the project sponsor(s) (lead agency) who will be responsible for complying with CEQA and NEPA, if applicable, for individual projects. MTC will use the Mitigation Monitoring Program to help to ensure that proposed mitigation measures are incorporated into the project environmental review documents and will encourage project sponsors to implement the recommended mitigation measures that help to reduce the identified environmental impact.
- D. The mitigation measures are appropriate for reducing the impacts identified at the program level. Specific mitigation measures that meet or exceed the requirements of these proposed measures will have to be implemented by project sponsors for impacts identified during the environmental evaluation of individual projects, particularly as they relate to details about the project location. This future project-level environmental review will determine whether impacts can be mitigated to a less-than-significant level. In order for project-level environmental review to tier off the program EIR for the Plan, however, it must incorporate the mitigation measures set forth therein (CEQA Guidelines Section 15168, subd. (c)(3)). Thus, the use of this EIR by project sponsors in preparing environmental documents of specific projects will help ensure that project-specific mitigation measures will be implemented.
- E. The nature of the program-level evaluation of impacts is such that not enough is known about the specific project-level conditions to determine if the proposed mitigation measures will in fact be feasible and effective. Social, economic, legal, and technological conditions related to the ultimate design of individual projects will be factors in the feasibility of proposed mitigation measures at the project level. In particular, because the location and duration of specific construction projects is still unknown, and yet localized project construction-related impacts are potentially disruptive for households, businesses, and even communities, this analysis cannot be sure of the ultimate effectiveness of the proposed mitigation measures.

# Impact

2.3-3 Transportation improvements in the proposed Transportation 2035 Plan have the potential to cause long-term community disruption. (Draft EIR, p. 2.3-34)

# **Mitigation Measures**

**2.3(c)** As project sponsors prepare the environmental review document for their individual project pursuant to CEQA/NEPA and prior to environmental certification, project sponsors shall consider adopting appropriate measures that would minimize or eliminate cumulatively considerable environmental impacts pursuant to CEQA/NEPA. MTC shall be provided with status reports of compliance with mitigation measures pursuant to MTC Resolution 1481, Revised. Mitigation measures to reduce long-term disruption or displacement of existing communities that shall be considered by project sponsors and decision-makers may include, but are not limited to, those described below.

- Berms and fencing to reduce conflicts between transportation facilities and existing uses;
- Pedestrian and bike connectors across widened sections of roadway;
- Sidewalk, signal, and signage treatments to improve the pedestrian connectivity across widened sections of roadway;
- Corridor realignment, where feasible, to avoid land use disruption; and
- Buffer zones and setbacks to protect the continuity of land uses.

**2.3(d)** Through regional programs such as the Transportation for Livable Communities Program, Regional Bicycle Program, etc., MTC shall continue to support locally sponsored traffic calming and alternative transportation initiatives, such as paths, trails, overcrossings, bicycle plans, and the like that foster improved neighborhoods and community connections.

#### **Impact Conclusion**

This impact is potentially significant, but can be reduced to a level that is less than significant with implementation of the proposed mitigation measures.

#### Findings

Changes or alterations have been required in, or incorporated into, the project that reduce the impact to a level that is less than significant (Finding (1)). The identified mitigation measures are within the responsibility and jurisdiction of other public agencies, and not MTC, and those agencies can and should adopt the measures (Finding (2)).

# Facts in Support of Findings

A. As the transportation planning, coordinating, and financing agency for the nine-county San Francisco Bay Area, MTC functions as both the regional transportation planning agency—a state designation—and, for federal purposes, as the region's metropolitan planning organization (MPO). As such, it is responsible for regularly updating the Regional Transportation Plan and for screening requests from local agencies for state and federal grants for transportation projects to determine their compatibility with the plan. Proposed mitigation measure 2.3(d) is within MTC's regional planning role and capitalizes on the coordination already underway through the Joint Policy Committee (which is comprised of board members from MTC, ABAG, Bay Area Air Quality Management District, and Bay Conservation and Development Commission). In accordance with the Mitigation Monitoring Program, MTC will ensure implementation of this program-level mitigation measure that reduces the identified environmental impact. This mitigation measure will reduce the potential for long-term community disruption because it will increase the connectivity of and between neighborhoods and will ensure that this connective infrastructure is a part of the design process for larger, potentially disruptive, transportation projects.

- B. Mitigation measure 2.3(c) addresses site-specific factors that must be considered for each individual transportation project, rather than within the overall Transportation 2035 Plan. Therefore, implementation of this mitigation measure relies on the efforts of other agencies, namely the project sponsor(s) (lead agency) who will be responsible for complying with CEQA and NEPA, if applicable, for individual projects. MTC will use the Mitigation Monitoring Program to help to ensure that the proposed mitigation measures are incorporated into the project environmental review documents.
- C. The mitigation measures are appropriate for reducing the impacts identified at the program level. Specific mitigation measures that meet or exceed the requirements of these proposed measures will have to be implemented by project sponsors for impacts identified during the environmental evaluation of individual projects, particularly as they relate to details about the project location. In order for project-level environmental review to tier off the program EIR for the Plan, however, it must incorporate the mitigation measures set forth therein (CEQA Guidelines Section 15168, subd. (c)(3)). Thus, the use of this EIR by project sponsors in preparing environmental documents of specific projects will help ensure that project-specific mitigation measures will be implemented. With implementation of these measures, the impact will be reduced to a level that is less than significant.

# Cumulative Impact

2.3-5 Concurrent implementation of the proposed Transportation 2035 Plan and forecast development would result in cumulatively considerable conversion of prime and important farmlands to urban use throughout the Bay Area. (Draft EIR, p. 2.3-37)

#### **Mitigation Measures**

MTC has no land use authority and cannot directly affect the pattern of future land uses. However, in addition to mitigation measures 2.3(a) through 2.3(d), it can strive to implement the following measure to reduce transportation impacts on Prime and Important farmland.

**2.3(e)** MTC, in partnership with regional agencies such as ABAG, through its ongoing representation on the Joint Policy Committee (whose efforts already include Draft Policies for the Bay Area's Implementation of Senate Bill 375, published January 23, 2009), and in cooperation with local governments and advocacy groups such as Greenbelt Alliance and TransForm (formerly TALC), shall pursue the enhanced coordination of local land use planning with transportation investments in the proposed Transportation 2035 Plan, consistent with the requirements and goals of SB 375. As a part of that effort, MTC shall continue to participate in, support, and promote the multi-agency FOCUS project, which is intended to coordinate regional growth efforts to use land more efficiently, optimize transportation and other infrastructure investments in existing communities that focus new development near existing transit, preserve open space, etc.

#### **Impact Conclusion**

The overall cumulative impact will remain significant and unavoidable after the incorporation of feasible mitigation. The project's contribution will also remain cumulatively considerable.

#### Findings

Changes or alterations have been required in, or incorporated into, the project that will reduce the significance of the impact (Finding (1)). The identified mitigation measures are within the responsibility and jurisdiction of other public agencies, and not MTC, and those agencies can and should adopt the measures (Finding (2)). Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers make further mitigation measures infeasible (Finding (3)).

- A. Cumulative population growth and development, regardless of the proposed Project, will occur in the region and will result in a substantial contribution to the identified cumulative impact.
- B. The proposed mitigation measures, along with conformity with existing federal, State, and local regulations, could be expected to reduce the overall cumulative effect, as well as the Plan's contribution to the overall cumulative effect.
- C. As the transportation planning, coordinating, and financing agency for the nine-county San Francisco Bay Area, MTC functions as both the regional transportation planning agency—a state designation—and, for federal purposes, as the region's metropolitan planning organization (MPO). As such, it is responsible for regularly updating the Regional Transportation Plan and for screening requests from local agencies for state and federal grants for transportation projects to determine their compatibility with the plan. Proposed mitigation measure 2.3(e) is within MTC's regional planning role and capitalizes on the coordination already underway through the Joint Policy Committee (which is comprised of board members from MTC, ABAG, Bay Area Air Quality Management District, and Bay Conservation and Development Commission). In accordance with the Mitigation Monitoring Program, MTC will ensure implementation of this program-level mitigation measure that reduces the identified environmental impact.
- D. Other mitigation measures address site-specific factors that must be considered for each individual transportation project, rather than within the overall Transportation 2035 Plan. Therefore, implementation of the identified mitigation measures relies on the efforts of other agencies, namely the project sponsor(s) (lead agency) who will be responsible for complying with CEQA and NEPA, if applicable, for individual projects. MTC will use the Mitigation Monitoring Program to help to ensure that proposed mitigation measures are incorporated into the project environmental review documents.
- E. The mitigation measures are appropriate for reducing the impacts identified at the program level. Specific mitigation measures that meet or exceed the requirements of these proposed measures will have to be implemented by project sponsors for impacts identified during the environmental evaluation of individual projects, particularly as they relate to details about the project location. This future project-level environmental review will determine whether impacts can be mitigated to a less-than-significant level. In order for project-level environmental review to tier off the program EIR for the Plan, however, it

must incorporate the mitigation measures set forth therein (CEQA Guidelines Section 15168, subd. (c)(3)). Thus, the use of this EIR by project sponsors in preparing environmental documents of specific projects will help ensure that project-specific mitigation measures will be implemented.

F. The nature of the program-level evaluation of impacts is such that not enough is known about the specific project-level conditions to determine if the proposed mitigation measures will in fact be feasible and effective. Social, economic, legal, and technological conditions related to the ultimate design of individual projects and their relationship to surrounding communities will be factors in the feasibility and effectiveness of the proposed mitigation measures. An example of this uncertainty is the inconsistency in the quality, effectiveness, and enforcement of existing local greenbelts and urban growth boundaries (Draft EIR, p. 2.3-38). Enhanced regional coordination will reduce some of this uncertainty, but will not remove it entirely.

# **GREENHOUSE GASES AND CLIMATE CHANGE**

#### **Cumulative Impact**

2.5-1 Implementation of Transportation 2035 Plan projects, combined with forecast regional growth, would contribute to GHG emissions. (Draft EIR, p. 2.5-18)

## **Mitigation Measures**

**2.5(a)** MTC shall commit to working with ABAG, BCDC, and BAAQMD, through the JPC, to develop a set of "green construction" policies and best practices that encourage use of lowest emitting construction equipment and fuels (e.g., diesel-powered vehicles meeting the most current CARB-certified tier or better engines).

**2.5(b)** As project sponsors prepare the environmental review document for their individual project pursuant to CEQA/NEPA and prior to environmental certification, project sponsors shall consider adopting appropriate measures that would minimize or eliminate cumulatively considerable environmental impacts pursuant to CEQA/NEPA. MTC shall be provided with status reports of compliance with mitigation measures pursuant to MTC Resolution 1481, Revised. Mitigation measures to reduce impacts related to greenhouse gas emissions that shall be considered by project sponsors and decision-makers may include, but are not limited to, those described below.

- Adopt and implement "green building" standards for any public buildings (transit stations, ferry buildings, maintenance facilities, etc) funded by MTC to achieve a LEEDTM Silver or better or equivalent certification.
- Use light colored pavement for solar reflectivity and reduced heat island effects wherever construction costs are no higher than 5 or 10 percent of the least cost alternative paving material.
- Install solar photovoltaic systems or use of renewable sources of energy for transportation buildings and maintenance facilities, wherever "feasible", as the term is defined in CEQA.
- Plant shade trees as part of specified types of construction projects or wherever construction results in loss of tree cover, because trees have carbon sequestration capacity.

- Establish or update minimum standards for construction management, including specifying minimum content for recycled products in aggregate, concrete, etc. and construction waste management.
- Establish standards or incentives for light pollution reduction related to street lighting and lighting of transportation and parking facilities to promote low-energy use for permanent as well as temporary fixtures.

See also *Chapter 2.1: Transportation* and *Chapter 2.2: Air Quality* which contain mitigation that would help to further reduce greenhouse gas emissions from transportation projects.

## **Impact Conclusion**

The overall cumulative impact will remain significant and unavoidable after the incorporation of feasible mitigation. The project's contribution, however, is not cumulatively considerable.

## Findings

Changes or alterations have been required in, or incorporated into, the project that will reduce the significance of the proposed Project's contribution to the cumulative impact (Finding (1)). Because the proposed Project's incremental contribution to the cumulatively significant impact is not cumulatively considerable, these changes were not required under CEQA, but were provided as a supplemental good faith effort to reduce the overall significant cumulative impact. Identified mitigation measures are within the responsibility and jurisdiction of other public agencies, and not MTC, and those agencies can and should adopt the measures (Finding (2)).

- A. Cumulative population growth and development, regardless of the proposed Project, will occur in the region and will result in a substantial contribution to the identified cumulative impact. Implementation of the proposed Transportation 2035 Plan itself will not result in a considerable contribution to this cumulative impact.
- B. Because the Plan's contribution to the cumulative impact is not considerable, the mitigation measures provided were not required according to the EIR analysis, but rather provided as a supplementary good faith effort to further reduce the overall cumulative impact. (Draft EIR, p. 2.5-18 describes the analysis result and p. 2.5-20 under Mitigation Measures explains why additional measures are recommended despite the analysis)
- C. As the transportation planning, coordinating, and financing agency for the nine-county San Francisco Bay Area, MTC functions as both the regional transportation planning agency—a state designation—and, for federal purposes, as the region's metropolitan planning organization (MPO). As such, it is responsible for regularly updating the Regional Transportation Plan and for screening requests from local agencies for state and federal grants for transportation projects to determine their compatibility with the plan. Proposed mitigation measure 2.5(a) is within MTC's authority and regional planning role, and capitalizes on the coordination already underway through the Joint Policy Committee (which is comprised of board members from MTC, ABAG, Bay Area Air Quality Management District, and Bay Conservation and Development Commission).
- D. In accordance with the Mitigation Monitoring Program, MTC will ensure implementation of program-level mitigation measures are within its responsibility and jurisdiction

and will encourage project sponsors to implement the recommended mitigation measures that help to reduce the identified cumulative environmental impact.

- E. Implementation of mitigation measure 2.5(b) relies on the efforts of other agencies, namely the project sponsor(s) (lead agency) who will be responsible for complying with CEQA and NEPA, if applicable, for individual projects. MTC will use the Mitigation Monitoring Program to help to ensure that proposed mitigation measures are incorporated into project environmental review documents.
- F. Mitigation measure 2.5(b) is appropriate for reducing the impacts identified at the program level. Specific mitigation measures that meet or exceed the requirements of this proposed measure will have to be implemented by project sponsors for impacts identified during the environmental evaluation of individual projects. This future project-level environmental review will determine whether impacts can be mitigated to a less-thansignificant level. In order for project-level environmental review to tier off the program EIR for the Plan, however, it must incorporate the mitigation measures set forth therein (CEQA Guidelines Section 15168, subd. (c)(3)). Thus, the use of this EIR by project sponsors in preparing environmental documents of specific projects will help ensure that project-specific mitigation measures will be implemented.
- G. Proposed mitigation measures, along with conformity with existing federal, State, and local regulations, are expected to reduce the overall cumulative effect, as well as the Plan's less-than-significant incremental contribution to the overall cumulative effect.

# **Cumulative Impact**

2.5-2 Transportation 2035 Plan projects, combined with future forecast development in the region, have the potential to result in a cumulatively considerable increase in exposure to risk related to sea level rise. (Draft EIR, p. 2.5-21)

# **Mitigation Measures**

**2.5(c)** MTC will work with BCDC, in partnership with the regional agencies and other partners who would like to participate, to conduct a vulnerability assessment for the region's transportation infrastructure and identify the appropriate adaptation strategies to protect those transportation resources that are likely to impacted and are a priority for the region to protect. This assessment should build off of but not duplicate current BCDC efforts and research underway. The results of this assessment and synthesis of related research should be used to inform the evolution of FOCUS Priority Development Areas and Priority Conservation Areas, in particular by identifying places where targeted development may conflict with sea level rise risk and targeted conservation may be more appropriate.

**2.5(d)** As project sponsors prepare the environmental review document for their individual project pursuant to CEQA/NEPA and prior to environmental certification, project sponsors shall consider adopting appropriate measures that would minimize or eliminate cumulatively considerable environmental impacts pursuant to CEQA/NEPA. MTC shall be provided with status reports of compliance with mitigation measures pursuant to MTC Resolution 1481, Revised. Mitigation measures to reduce impacts related to sea level rise that shall be considered by project sponsors and decision-makers may include, but are not limited to, those described below.

- Engineering designs for new transportation projects shall demonstrate that they have factored in sea level rise and potential increases in storm surge inundation, and are budgeting for and already incorporate mitigation measures to adapt to projected sea level rise and storm surge. These mitigation measures should consider the effects on Bay and coastal zone resources and avoid or reduce future risk to the infrastructure and the region.
- For those transportation projects that do not involve new infrastructure but increase capacity of existing infrastructure, project sponsors shall demonstrate that they have investigated the vulnerability of their existing facilities to sea level rise and storm surge inundation and have budgeted for mitigation measures to adapt to projected sea level rise and storm surge. These mitigation measures should consider the effects on Bay and coastal zone resources and avoid or reduce future risk to the infrastructure and the region.

## **Impact Conclusion**

The overall cumulative impact will remain significant and unavoidable after the incorporation of feasible mitigation. The project's contribution, however, is not cumulatively considerable after the incorporation of feasible mitigation.

## Findings

Changes or alterations have been required in, or incorporated into, the project that will reduce the significance of the Plan's incremental contribution to the cumulative impact (Finding (1)). Because the Plan's incremental contribution to the cumulatively significant impact is not cumulatively considerable, these changes were not required under CEQA, but were provided as a supplemental good faith effort to reduce the overall significant cumulative impact. Identified mitigation measures are within the responsibility and jurisdiction of other public agencies, and not MTC, and those agencies can and should adopt the measures (Finding (2)).

- A. Cumulative population growth and development, regardless of the proposed Project, will occur in the region and will result in a substantial contribution to the identified cumulative impact.
- B. Proposed mitigation measures, along with conformity with existing federal, State, and local regulations, are expected to reduce the overall cumulative effect, as well as the Plan's contribution to the overall cumulative effect.
- C. As the transportation planning, coordinating, and financing agency for the nine-county San Francisco Bay Area, MTC functions as both the regional transportation planning agency—a state designation—and, for federal purposes, as the region's metropolitan planning organization (MPO). As such, it is responsible for regularly updating the Regional Transportation Plan and for screening requests from local agencies for state and federal grants for transportation projects to determine their compatibility with the plan. Proposed mitigation measure 2.5(c) is within MTC's authority and regional planning role, and capitalizes on the coordination already underway through the Joint Policy Committee (which is comprised of board members from MTC, ABAG, Bay Area Air Quality Management District, and Bay Conservation and Development Commission).

- D. In accordance with the Mitigation Monitoring Program, MTC will ensure implementation of program-level mitigation measures that are within its responsibility and jurisdiction and will encourage project sponsors to implement the recommended mitigation measures that help to reduce the identified cumulative environmental impact.
- E. Implementation of mitigation measure 2.5(d) relies on the efforts of other agencies, namely the project sponsor(s) (lead agency) who will be responsible for complying with CEQA and NEPA, if applicable, for individual projects. MTC will use the Mitigation Monitoring Program to help to ensure that proposed mitigation measures are incorporated into project environmental review documents.
- F. Mitigation measure 2.5(d) is appropriate for reducing the impacts identified at the program level. Specific mitigation measures that meet or exceed the requirements of this proposed measure will have to be implemented by project sponsors for impacts identified during the environmental evaluation of individual projects, particularly as they relate to details about project location. In order for project-level environmental review to tier off the program EIR for the Plan, however, it must incorporate the mitigation measures set forth therein (CEQA Guidelines Section 15168, subd. (c)(3)). Thus, the use of this EIR by project sponsors in preparing environmental documents of specific projects will help ensure that project-specific mitigation measures will be implemented.
- G. Implementation of the proposed Transportation 2035 Plan, and mitigation measures, will not result in a considerable contribution to this cumulative impact.

# NOISE

# Impact

2.6-2 Transportation 2035 Plan projects could result in noise levels that approach or exceed the FHWA Noise Abatement Criteria or could cause noise levels to increase by 3 dBA or more when compared to existing conditions. (Draft EIR, p. 2.6-20)

# **Mitigation Measures**

As project sponsors prepare the environmental review document for their individual project pursuant to CEQA/NEPA and prior to environmental certification, project sponsors shall consider adopting appropriate measures that would minimize or eliminate cumulatively considerable environmental impacts pursuant to CEQA/NEPA. MTC shall be provided with status reports of compliance with mitigation measures pursuant to MTC Resolution 1481, Revised. Mitigation measures to reduce noise impacts that shall be considered by project sponsors and decisionmakers may include, but are not limited to, those described below.

**2.6(a)** Adjustments to proposed roadway or transit alignments to reduce noise levels in noise sensitive areas. For example, below-grade roadway alignments can effectively reduce noise levels in nearby areas.

**2.6(b)** Techniques such as landscaped berms, dense plantings, reduced-noise paving materials, and traffic calming measures in the design of their transportation improvements.

**2.6(c)** Contributing to the insulation of buildings or construction of noise barriers around sensitive receptor properties adjacent to the transportation improvement.

#### **Impact Conclusion**

This impact is potentially significant, but can be reduced to a level that is less than significant with implementation of the proposed mitigation measures.

## Findings

Changes or alterations have been required in, or incorporated into, the project that reduce the impact to a level that is less than significant (Finding (1)). The identified mitigation measures are within the responsibility and jurisdiction of other public agencies, and not MTC, and those agencies can and should adopt the measures (Finding (2)).

- A. Per US HUD Department of Housing and Urban Development, *The Noise Guidebook*, updated August 20, 2004, berms or other solid, continuous barriers that block the line of sight between the receptor and the source will attenuate noise levels by at least 3 dBA.
- B. Below-grade alignments effectively create a berm between the receptor and the source.
- C. Traffic calming will reduce vehicle speeds which will reduce noise levels commensurate with the equations of the traffic noise prediction model of the FHWA.
- D. Reduced noise paving materials reduce noise levels by 4 dBA per Sacramento County Department of Environmental Review and Assessment, Report of the status of Rubberized Asphalt on traffic noise reduction in Sacrament County December 1999.
- E. The mitigation measures address site-specific factors that must be considered for each individual transportation project, rather than within the overall Transportation 2035 Plan. Therefore, implementation of the identified mitigation measures relies on the efforts of other agencies, namely the project sponsor(s) (lead agency) who will be responsible for complying with CEQA and NEPA, if applicable, for individual projects. MTC will use the Mitigation Monitoring Program to help to ensure that proposed mitigation measures are incorporated into project environmental review documents.
- F. The mitigation measures are appropriate for reducing the impacts identified at the program level. Specific mitigation measures that meet or exceed the requirements of these proposed measures will have to be implemented by project sponsors for impacts identified during the environmental evaluation of individual projects, particularly as they relate to details about project location. This future project-level environmental review will determine whether impacts can be mitigated to a less-than-significant level. In order for project-level environmental review to tier off the program EIR for the Plan, however, it must incorporate the mitigation measures set forth therein (CEQA Guidelines Section 15168, subd. (c)(3)). Thus, the use of this EIR by project sponsors in preparing environmental documents of specific projects will help ensure that project-specific mitigation measures will be implemented. With implementation of these measures, the impact will be reduced to a level that is less than significant.

#### Impact

# 2.6-3 Implementation of the proposed Transportation 2035 Plan could result in increased noise and groundborne vibration related to transit operations. (Draft EIR, p. 2.6-23)

#### **Mitigation Measures**

As project sponsors prepare the environmental review document for their individual project pursuant to CEQA/NEPA and prior to environmental certification, project sponsors shall consider adopting appropriate measures that would minimize or eliminate cumulatively considerable environmental impacts pursuant to CEQA/NEPA. MTC shall be provided with status reports of compliance with mitigation measures pursuant to MTC Resolution 1481, Revised. Mitigation measures to reduce noise impacts that shall be considered by project sponsors and decisionmakers may include, but are not limited to, those described below.

Mitigation measures 2.6(a) through 2.6(c) above are considered appropriate for bus transit noise impacts. In addition to those mitigation measures, the following additional measures are provided to reduce Impact 2.6-3 as it pertains to rail transit:

**2.6(d)** Design approaches to reduce noise and vibration impacts of rail transit, such as vibration isolation of track segments, use of continuously welded track to minimize wheel noise, resilient wheels, vehicle skirts, wheel truing, rail grinding, undercar absorption, or vehicle horn loudness and pitch adjustments.

**2.6(e)** Operational changes to reduce noise impacts of rail transit, such as assisting local jurisdictions in pursuing Quiet Zones.

#### **Impact Conclusion**

This impact is potentially significant, but can be reduced to a level that is less than significant with implementation of the proposed mitigation measures.

#### Findings

Changes or alterations have been required in, or incorporated into, the project that reduce the impact to a level that is less than significant (Finding (1)). The identified mitigation measures are within the responsibility and jurisdiction of other public agencies, and not MTC, and those agencies can and should adopt the measures (Finding (2)).

- A. Per US HUD Department of Housing and Urban Development, *The Noise Guidebook*, updated August 20, 2004, berms or other solid, continuous barriers that block the line of sight between the receptor and the source will attenuate noise levels by at least 3 dBA.
- B. Below-grade alignments effectively create a berm between the receptor and the source.
- C. Traffic calming will reduce vehicle speeds which will reduce noise levels commensurate with the equations of the traffic noise prediction model of the FHWA.

#### Transportation 2035 Plan Final Environmental Impact Report

- D. Reduced noise paving materials reduce noise levels by 4 dBA per Sacramento County Department of Environmental Review and Assessment, Report of the status of Rubberized Asphalt on traffic noise reduction in Sacrament County December 1999.
- E. Design approaches described in mitigation measure 2.6(d) can reduce vibration by up to 15 vDB. The extent of vibration attenuation depends upon a number of factors (Federal Transit Administration, *Transit Noise and Vibration Impact Assessment*, May 2006).
- F. Mitigation measure 2.6(e) is a common sense benefit targeted at reducing the annoyance of horn noise in residential areas.
- G. The mitigation measures address site-specific factors that must be considered for each individual transportation project, rather than within the overall Transportation 2035 Plan. Therefore, implementation of the identified mitigation measures relies on the efforts of other agencies, namely the project sponsor(s) (lead agency) who will be responsible for complying with CEQA and NEPA, if applicable, for individual projects. MTC will use the Mitigation Monitoring Program to help to ensure that proposed mitigation measures are incorporated into project environmental review documents.
- H. The mitigation measures are appropriate for reducing the impacts identified at the program level. Specific mitigation measures that meet or exceed the requirements of these proposed measures will have to be implemented by project sponsors for impacts identified during the environmental evaluation of individual projects, particularly as they relate to details about project location. In order for project-level environmental review to tier off the program EIR for the Plan, however, it must incorporate the mitigation measures set forth therein (CEQA Guidelines Section 15168, subd. (c)(3)). Thus, the use of this EIR by project sponsors in preparing environmental documents of specific projects will help ensure that project-specific mitigation measures will be implemented. With implementation of these measures, the impact will be reduced to a level that is less than significant.

#### **Cumulative Impact**

2.6-4 The proposed Transportation 2035 Plan, combined with traffic related to projected regional population and employment growth, could result in a cumulatively considerable increase in overall noise levels along some travel corridors. (Draft EIR, p. 2.6-24)

#### **Mitigation Measures**

As project sponsors prepare the environmental review document for their individual project pursuant to CEQA/NEPA and prior to environmental certification, project sponsors shall consider adopting appropriate measures that would minimize or eliminate cumulatively considerable environmental impacts pursuant to CEQA/NEPA. MTC shall be provided with status reports of compliance with mitigation measures pursuant to MTC Resolution 1481, Revised. Mitigation measures to reduce noise impacts that shall be considered by project sponsors and decisionmakers may include, but are not limited to, those described below.

**2.6(a)** Adjustments to proposed roadway or transit alignments to reduce noise levels in noise sensitive areas. For example, below-grade roadway alignments can effectively reduce noise levels in nearby areas.

**2.6(b)** Techniques such as landscaped berms, dense plantings, reduced-noise paving materials, and traffic calming measures in the design of their transportation improvements.

**2.6(c)** Contributing to the insulation of buildings or construction of noise barriers around sensitive receptor properties adjacent to the transportation improvement.

**2.6(d)** Design approaches to reduce noise and vibration impacts of rail transit, such as vibration isolation of track segments, use of continuously welded track to minimize wheel noise, resilient wheels, vehicle skirts, wheel truing, rail grinding, undercar absorption, or vehicle horn loudness and pitch adjustments.

**2.6(e)** Operational changes to reduce noise impacts of rail transit, such as assisting local jurisdictions in pursuing Quiet Zones.

#### Impact Conclusion

The overall cumulative impact will remain significant and unavoidable after the incorporation of feasible mitigation. The project's contribution will also remain cumulatively considerable after the incorporation of feasible mitigation.

#### Findings

Changes or alterations have been required in, or incorporated into, the project that will reduce the significance of the impact (Finding (1)). The identified mitigation measures are within the responsibility and jurisdiction of other public agencies, and not MTC, and those agencies can and should adopt the measures (Finding (2)). Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers make further mitigation measures infeasible (Finding (3)).

- A. Cumulative population growth and development, regardless of the proposed Project, will occur in the region and will result in a substantial contribution to the identified cumulative impact.
- B. The mitigation measures address site-specific factors that must be considered for each individual transportation project, rather than within the overall Transportation 2035 Plan. Therefore, implementation of the identified mitigation measures relies on the efforts of other agencies, namely the project sponsor(s) (lead agency) who will be responsible for complying with CEQA and NEPA, if applicable, for individual projects. MTC will use the Mitigation Monitoring Program to help to ensure that proposed mitigation measures are incorporated into project environmental review documents.
- C. The mitigation measures are appropriate for reducing the impacts identified at the program level. Specific mitigation measures that meet or exceed the requirements of these proposed measures will have to be implemented by project sponsors for impacts identified during the environmental evaluation of individual projects, particularly as they relate to details about project location. This future project-level environmental review will determine whether impacts can be mitigated to a less-than-significant level. In order for project-level environmental review to tier off the program EIR for the Plan, however, it must incorporate the mitigation measures set forth therein (CEQA Guidelines Section 15168, subd. (c)(3)). Thus, the use of this EIR by project sponsors in preparing environmental documents of specific projects will help ensure that project-specific mitigation measures will be implemented.

- D. Proposed mitigation measures, along with conformity with existing federal, State, and local regulations, are expected to reduce the overall cumulative effect, as well as the Plan's contribution to the overall cumulative effect.
- E. However, the nature of the program-level evaluation of impacts is such that not enough is known about the specific project-level conditions to determine if the proposed mitigation measures will in fact be feasible and effective. Social, economic, legal, and technological conditions related to the ultimate design of individual projects will be factors in the feasibility of proposed mitigation measures at the project level. In particular, noise impacts are highly localized and related to the unique interaction between physical environmental conditions at the project location, other undetermined noise sources in the vicinity, and the specific locations and characteristics of sensitive receptors. Thus, while the mitigations proposed are reasonably suited to maximally reduce noise attributable to the proposed Plan projects, it is still possible that these outside factors could create a situation in which noise mitigation is either infeasible or ineffective.

## **GEOLOGY AND SEISMICITY**

#### Impact

2.7-1 Seismic activity resulting in surface rupture, ground shaking, liquefaction, landslides or tsunamis could damage existing and proposed transportation infrastructure and pose public safety risks. (Draft EIR, p. 2.7-16)

#### **Mitigation Measures**

2.7(a) As project sponsors prepare the environmental review document for their individual project pursuant to CEQA/NEPA and prior to environmental certification, project sponsors shall consider adopting appropriate measures that would minimize or eliminate cumulatively considerable environmental impacts pursuant to CEQA/NEPA. MTC shall be provided with status reports of compliance with mitigation measures pursuant to MTC Resolution 1481, Revised. Mitigation measures to reduce significant seismic impacts, as determined by a State licensed geotechnical professional, that shall be considered by project sponsors and decision-makers may include, but are not limited to, those described below.

- Consider seismicity of the site, soil response at the site, and dynamic characteristics of the structure in the seismic design of the project, in compliance with the California Building Code and Caltrans' standards for construction, or other more stringent standards, as applicable.
- Facilitate geotechnical analyses as necessary within construction areas to ascertain soil types and local faulting prior to preparation of project designs.
- For projects located within Alquist-Priolo Earthquake Fault Zones, prepare recommendations for the mitigation and reduction of hazards in accordance with California Geological Survey Guidelines for Evaluation the Hazard of Earthquake Fault Rupture.
- Avoid or stabilize landslide areas and potentially unstable slopes wherever feasible.
- For projects located within liquefaction or earthquake-induced landslide Seismic Hazard Zones, prepare recommendations for the mitigation and reduction of hazards in accordance

with California Geological Survey Guidelines for Evaluating and Mitigating Seismic Hazards Special Publication 117.

• For projects adjacent to the Bay and/or Pacific Ocean, evaluate tsunami inundation risks and implement, where necessary and feasible, precautionary measures, such as specifying final roadbed elevations greater than the expected height of a tsunami with a given return frequency.

#### Impact Conclusion

This impact is potentially significant, but can be reduced to a level that is less than significant with implementation of the proposed mitigation measures.

#### **Findings**

Changes or alterations have been required in, or incorporated into, the project that reduce the impact to a level that is less than significant (Finding (1)). The identified mitigation measures are within the responsibility and jurisdiction of other public agencies, and not MTC, and those agencies can and should adopt the measures (Finding (2)).

#### Facts in Support of Findings

- A. The mitigation measures address site-specific factors that must be considered for each individual transportation project, rather than within the overall Transportation 2035 Plan. Therefore, implementation of the identified mitigation measures relies on the efforts of other agencies, namely the project sponsor(s) (lead agency) who will be responsible for complying with CEQA and NEPA, if applicable, for individual projects. MTC will use the Mitigation Monitoring Program to help to ensure that proposed mitigation measures are incorporated into project environmental review documents.
- B. The mitigation measures are appropriate for reducing the impacts identified at the program level. Specific mitigation measures that meet or exceed the requirements of these proposed measures will have to be implemented by project sponsors for impacts identified during the environmental evaluation of individual projects, particularly as they relate to details about project location. In order for project-level environmental review to tier off the program EIR for the Plan, however, it must incorporate the mitigation measures set forth therein (CEQA Guidelines Section 15168, subd. (c)(3)). Thus, the use of this EIR by project sponsors in preparing environmental documents of specific projects will help ensure that project-specific mitigation measures will be implemented. With implementation of these measures, the impact will be reduced to a level that is less than significant.
- C. The mitigation measures are particularly reliable because they are already enforced by existing agencies and regulatory standards (e.g. California Building Code and Caltrans' standards for construction) which are integral parts of the project development, review, and permitting processes. The mitigation measures help to ensure that these existing standards and regulations are met.

#### Impact

2.7-2 Highway and rail construction could require significant earthwork and road cuts, which could increase short-term and long-term soil erosion potential. (Draft EIR, p. 2.7-26)

#### **Mitigation Measures**

**2.7(b)** As project sponsors prepare the environmental review document for their individual project pursuant to CEQA/NEPA and prior to environmental certification, project sponsors shall consider adopting appropriate measures that would minimize or eliminate cumulatively considerable environmental impacts pursuant to CEQA/NEPA. MTC shall be provided with status reports of compliance with mitigation measures pursuant to MTC Resolution 1481, Revised. Mitigation measures that shall be considered by project sponsors and decision-makers may include, but are not limited to, Best Management Practices to reduce soil erosion by water and wind. These could include temporary cover of exposed, engineered slopes, or silt fencing. Where required, based on affected area (greater than one acre), agencies shall adhere to the requirements of the NPDES General Construction Permit and associated SWPPP.

#### **Impact Conclusion**

This impact is potentially significant, but can be reduced to a level that is less than significant with implementation of the proposed mitigation measures.

## Findings

Changes or alterations have been required in, or incorporated into, the project that reduce the impact to a level that is less than significant (Finding (1)). The identified mitigation measures are within the responsibility and jurisdiction of other public agencies, and not MTC, and those agencies can and should adopt the measures (Finding (2)).

- A. The mitigation measures address site-specific factors that must be considered for each individual transportation project, rather than within the overall Transportation 2035 Plan. Therefore, implementation of the identified mitigation measures relies on the efforts of other agencies, namely the project sponsor(s) (lead agency) who will be responsible for complying with CEQA and NEPA, if applicable, for individual projects. MTC will use the Mitigation Monitoring Program to help to ensure that proposed mitigation measures are incorporated into project environmental review documents.
- B. The mitigation measures are appropriate for reducing the impacts identified at the program level. Specific mitigation measures that meet or exceed the requirements of these proposed measures will have to be implemented by project sponsors for impacts identified during the environmental evaluation of individual projects, particularly as they relate to details about project location. In order for project-level environmental review to tier off the program EIR for the Plan, however, it must incorporate the mitigation measures set forth therein (CEQA Guidelines Section 15168, subd. (c)(3)). Thus, the use of this EIR by project sponsors in preparing environmental documents of specific projects will help ensure that project-specific mitigation measures will be implemented. With implementation of these measures, the impact will be reduced to a level that is less than significant.
- C. The mitigation measures are particularly reliable because they are already enforced by existing agencies and regulatory standards (e.g. requirements of the NPDES General Construction Permit and associated SWPPP) which are integral parts of the project development, review, and permitting processes. The mitigation measures help to ensure that these existing standards and regulations are met.

#### Impact

2.7-3 Highway and rail construction could require significant earthwork and road cuts, which could destabilize existing slopes causing landslides or slope failure. (Draft EIR, p. 2.7-27)

#### **Mitigation Measures**

2.7(c) As project sponsors prepare the environmental review document for their individual project pursuant to CEQA/NEPA and prior to environmental certification, project sponsors shall consider adopting appropriate measures that would minimize or eliminate cumulatively considerable environmental impacts pursuant to CEQA/NEPA. MTC shall be provided with status reports of compliance with mitigation measures pursuant to MTC Resolution 1481, Revised. Mitigation measures that shall be considered by project sponsors and decision-makers may include, but are not limited to, ensuring that project designs provide adequate slope drainage and appropriate landscaping to minimize the occurrence of slope instability and erosion. Road cuts shall be designed to maximize the potential for revegetation. Project sponsors shall ensure that local grading ordinances and building code requirements are strictly adhered to where appropriate.

#### **Impact Conclusion**

This impact is potentially significant, but can be reduced to a level that is less than significant with implementation of the proposed mitigation measures.

#### Findings

Changes or alterations have been required in, or incorporated into, the project that reduce the impact to a level that is less than significant (Finding (1)). The identified mitigation measures are within the responsibility and jurisdiction of other public agencies, and not MTC, and those agencies should adopt the measures (Finding (2)).

- A. The mitigation measures address site-specific factors that must be considered for each individual transportation project, rather than within the overall Transportation 2035 Plan. Therefore, implementation of the identified mitigation measures relies on the efforts of other agencies, namely the project sponsor(s) (lead agency) who will be responsible for complying with CEQA and NEPA, if applicable, for individual projects. MTC will use the Mitigation Monitoring Program to help to ensure that proposed mitigation measures are incorporated into project environmental review documents.
- B. The mitigation measures are appropriate for reducing the impacts identified at the program level. Specific mitigation measures that meet or exceed the requirements of these proposed measures will have to be implemented by project sponsors for impacts identified during the environmental evaluation of individual projects, particularly as they relate to details about project location. In order for project-level environmental review to tier off the program EIR for the Plan, however, it must incorporate the mitigation measures set forth therein (CEQA Guidelines Section 15168, subd. (c)(3)). Thus, the use of this EIR by project sponsors in preparing environmental documents of specific projects will help ensure that project-specific mitigation measures will be implemented. With implementation of these measures, the impact will be reduced to a level that is less than significant.

C. The mitigation measures are particularly reliable because they are already enforced by existing agencies and regulatory standards (e.g. local grading ordinances and building code requirements) which are integral parts of the project development, review, and permitting processes. The mitigation measures help to ensure that these existing standards and regulations are met.

# Impact

# 2.7-4 Projects built on highly compressible or expansive soils could become damaged and weakened over time. (Draft EIR, p. 2.7-28)

## **Mitigation Measures**

**2.7(d)** As project sponsors prepare the environmental review document for their individual project pursuant to CEQA/NEPA and prior to environmental certification, project sponsors shall consider adopting appropriate measures that would minimize or eliminate cumulatively considerable environmental impacts pursuant to CEQA/NEPA. MTC shall be provided with status reports of compliance with mitigation measures pursuant to MTC Resolution 1481, Revised. Mitigation measures that shall be considered by project sponsors and decision-makers may include, but are not limited to, ensuring that geotechnical investigations be conducted by qualified professionals (registered civil and geotechnical engineers, registered engineering geologists) to identify the potential for differential settlement and expansive soils and to recommend corrective measures, such as structural reinforcement and replacing soil with engineered fill. Recommended measures shall be incorporated into project designs.

#### **Impact Conclusion**

This impact is potentially significant, but can be reduced to a level that is less than significant with implementation of the proposed mitigation measures.

## Findings

Changes or alterations have been required in, or incorporated into, the project that reduce the impact to a level that is less than significant (Finding (1)). The identified mitigation measures are within the responsibility and jurisdiction of other public agencies, and not MTC, and those agencies should adopt the measures (Finding (2)).

- A. The mitigation measures address site-specific factors that must be considered for each individual transportation project, rather than within the overall Transportation 2035 Plan. Therefore, implementation of the identified mitigation measures relies on the efforts of other agencies, namely the project sponsor(s) (lead agency) who will be responsible for complying with CEQA and NEPA, if applicable, for individual projects. MTC will use the Mitigation Monitoring Program to help to ensure that proposed mitigation measures are incorporated into project environmental review documents.
- B. The mitigation measures are appropriate for reducing the impacts identified at the program level. Specific mitigation measures that meet or exceed the requirements of these proposed measures will have to be implemented by project sponsors for impacts identified during the environmental evaluation of individual projects, particularly as they relate

to details about project location. In order for project-level environmental review to tier off the program EIR for the Plan, however, it must incorporate the mitigation measures set forth therein (CEQA Guidelines Section 15168, subd. (c)(3)). Thus, the use of this EIR by project sponsors in preparing environmental documents of specific projects will help ensure that project-specific mitigation measures will be implemented. With implementation of these measures, the impact will be reduced to a level that is less than significant.

## **Cumulative Impact**

2.7-5 The proposed Transportation 2035 Plan, combined with regional population growth, would result in an increased risk of exposure of people and property to geologic hazards. (Draft EIR, p. 2.7-28)

#### Mitigation Measures

**2.7(a)** through **2.7(d)** above.

## Impact Conclusion

The overall cumulative impact will remain significant and unavoidable after the incorporation of feasible mitigation. The project's contribution, however, is not cumulatively considerable after the incorporation of feasible mitigation.

## Findings

Changes or alterations have been required in, or incorporated into, the project that will reduce the significance of the proposed Project's incremental contribution to the cumulative impact (Finding (1)). Because the proposed Project's incremental contribution to the cumulatively significant impact is not cumulatively considerable, these changes were not required under CEQA, but were provided as a supplemental good faith effort to reduce the overall significant cumulative impact. Identified mitigation measures are within the responsibility and jurisdiction of other public agencies, and not MTC, and those agencies can and should adopt the measures (Finding (2)).

- A. Cumulative population growth and development, regardless of the proposed Project, will occur in the region and will result in a substantial contribution to the identified cumulative impact.
- B. Proposed mitigation measures, along with conformity with existing federal, State, and local regulations, are expected to reduce the overall cumulative effect, as well as the Plan's contribution to the overall cumulative effect.
- C. The mitigation measures address site-specific factors that must be considered for each individual transportation project, rather than within the overall Transportation 2035 Plan. Therefore, implementation of the identified mitigation measures relies on the efforts of other agencies, namely the project sponsor(s) (lead agency) who will be responsible for complying with CEQA and NEPA, if applicable, for individual projects. MTC will use the Mitigation Monitoring Program to help to ensure that proposed mitigation measures are incorporated into project environmental review documents.

- D. The mitigation measures are appropriate for reducing the impacts identified at the program level. Specific mitigation measures that meet or exceed the requirements of these proposed measures will have to be implemented by project sponsors for impacts identified during the environmental evaluation of individual projects, particularly as they relate to details about project location. In order for project-level environmental review to tier off the program EIR for the Plan, however, it must incorporate the mitigation measures set forth therein (CEQA Guidelines Section 15168, subd. (c)(3)). Thus, the use of this EIR by project sponsors in preparing environmental documents of specific projects will help ensure that project-specific mitigation measures will be implemented.
- E. The mitigation measures are particularly reliable because they are already enforced by existing agencies and regulatory standards which are integral parts of the project development, review, and permitting processes. The mitigation measures help to ensure that these existing standards and regulations are met.
- F. Implementation of the proposed Transportation 2035 Plan, with mitigation measures, will not result in a considerable contribution to this cumulative impact.

# WATER RESOURCES

#### Impact

2.8-1 Construction of Transportation 2035 Plan projects could adversely affect water quality and drainage patterns in the short-term due to erosion and sedimentation. (Draft EIR, p. 2.8-13)

#### Mitigation Measures

**2.8(a)** As project sponsors prepare the environmental review document for their individual project pursuant to CEQA/NEPA and prior to environmental certification, project sponsors shall consider adopting appropriate measures that would minimize or eliminate cumulatively considerable environmental impacts pursuant to CEQA/NEPA. MTC shall be provided with status reports of compliance with mitigation measures pursuant to MTC Resolution 1481, Revised. Mitigation measures to reduce impacts on water resources that shall be considered by project sponsors and decision-makers may include, but are not limited to, those described below.

Project sponsors shall prepare and implement, as necessary, a Storm Water Pollution Prevention Plan (SWPPP) in accordance with the SWRCB's General Construction Permit. The SWPPP shall be consistent with the Manual of Standards for Erosion and Sedimentation Control by the Association of Bay Area Governments, the California Stormwater Quality Association (CASQA), Stormwater Best Management Practice Handbook for Construction, policies and recommendations of the local urban runoff program (city and/or county), and the recommendations of the RWQCB. Implementation of the SWPPP shall be enforced by inspecting agencies during the construction period via appropriate options such as citations, fines, and stop-work orders. Typical components of a SWPPP would include the following:

• Excavation and grading activities shall be scheduled for the dry season only (April 15 to October 15), to the extent feasible. This will reduce the chance of severe erosion from intense rainfall and surface runoff, as well as the potential for soil saturation in swale areas.

- If excavation occurs during the rainy season, storm runoff from the construction area shall be regulated through a stormwater management/erosion control plan that may include temporary on-site silt traps and/or basins with multiple discharge points to natural drainages and energy dissipaters. Stockpiles of loose material shall be covered and runoff diverted away from exposed soil material. If work is stopped due to rain, a positive grading away from slopes shall be provided to carry the surface runoff to areas where flow can be controlled, such as the temporary silt basins. Sediment basin/traps shall be located and operated to minimize the amount of offsite sediment transport. Any trapped sediment shall be removed from the basin or trap and placed at a suitable location on-site, away from concentrated flows, or removed to an approved disposal site.
- Temporary erosion control measures shall be provided until perennial revegetation or landscaping is established and can minimize discharge of sediment into nearby waterways. For construction within 500 feet of a water body, fiber rolls and/or gravel bags shall be placed upstream adjacent to the water body.
- After completion of grading, erosion protection shall be provided on all cut-and-fill slopes. Revegetation shall be facilitated by mulching, hydroseeding, or other methods and shall be initiated as soon as possible after completion of grading and prior to the onset of the rainy season (by October 15).
- Permanent revegetation/landscaping shall emphasize drought-tolerant perennial ground coverings, shrubs, and trees to improve the probability of slope and soil stabilization without adverse impacts to slope stability due to irrigation infiltration and long-term root development.
- BMPs selected and implemented for the project shall be in place and operational prior to the onset of major earthwork on the site. The construction phase facilities shall be maintained regularly and cleared of accumulated sediment as necessary.
- Hazardous materials such as fuels and solvents used on the construction sites shall be stored in covered containers and protected from rainfall, runoff, and vandalism. A stockpile of spill cleanup materials shall be readily available at all construction sites. Employees shall be trained in spill prevention and cleanup, and individuals should be designated as responsible for prevention and cleanup activities.

SWPPP(s) for projects immediately adjacent to or within drainages also will have to incorporate the following additional erosion control minimum criteria:

- Construction equipment shall not be operated in flowing water, except as may be necessary to construct crossings or barriers.
- Stream diversion structures shall be designed to preclude accumulation of sediment. If this is not feasible, an operation plan shall be developed to prevent adverse downstream effects from sediment discharges.
- Where working areas are adjacent to or encroach on live streams, barriers shall be constructed that are adequate to prevent the discharge of turbid water in excess of specified limits. The discharged water shall not exceed 110 percent of the ambient stream turbidity of the receiving water, if the receiving water is a flowing stream with turbidity greater than 50 nephelometric turbidity unit (NTU), or 5 NTU above ambient turbidity for ambient turbidities

that are less than or equal to 40 NTU. If the water is discharged to a dry streambed, the discharged water shall not exceed 50 NTU.

- Material from construction work shall not be deposited where it could be eroded and carried to the stream by surface runoff or high stream flows.
- Riparian vegetation shall be removed only when absolutely necessary.

## Impact Conclusion

This impact is potentially significant, but can be reduced to a level that is less than significant with implementation of the proposed mitigation measures.

## Findings

Changes or alterations have been required in, or incorporated into, the project that reduce the impact to a level that is less than significant (Finding (1)). The identified mitigation measures are within the responsibility and jurisdiction of other public agencies, and not MTC, and those agencies should adopt the measures (Finding (2)).

- A. The mitigation measures address site-specific factors that must be considered for each individual transportation project, rather than within the overall Transportation 2035 Plan. Therefore, implementation of the identified mitigation measures relies on the efforts of other agencies, namely the project sponsor(s) (lead agency) who will be responsible for complying with CEQA and NEPA, if applicable, for individual projects. MTC will use the Mitigation Monitoring Program to help to ensure that proposed mitigation measures are incorporated into project environmental review documents.
- B. The mitigation measures are appropriate for reducing the impacts identified at the program level. Specific mitigation measures that meet or exceed the requirements of these proposed measures will have to be implemented by project sponsors for impacts identified during the environmental evaluation of individual projects, particularly as they relate to details about project location. In order for project-level environmental review to tier off the program EIR for the Plan, however, it must incorporate the mitigation measures set forth therein (CEQA Guidelines Section 15168, subd. (c)(3)). Thus, the use of this EIR by project sponsors in preparing environmental documents of specific projects will help ensure that project-specific mitigation measures will be implemented. With implementation of these measures, the impact will be reduced to a level that is less than significant.
- C. The mitigation measures are particularly reliable because they are already enforced by existing agencies and regulatory standards (e.g. the Storm Water Pollution Prevention Plan (SWPPP) in accordance with the SWRCB's General Construction Permit, which must be consistent with the Manual of Standards for Erosion and Sedimentation Control by the Association of Bay Area Governments, the California Stormwater Quality Association (CASQA), Stormwater Best Management Practice Handbook for Construction, policies and recommendations of the local urban runoff program (city and/or county), and the recommendations of the RWQCB) which are integral parts of the project development, review, and permitting processes. The mitigation measures help to ensure that these existing standards and regulations are met.

#### Impact

2.8-2 Transportation 2035 Plan projects could adversely affect water resources in the long term by reducing permeable surfaces, which could result in additional runoff and erosion, degrade water quality in receiving waters, decrease groundwater recharge, or alter drainage patterns. (Draft EIR, p. 2.8-16)

## **Mitigation Measures**

**2.8(b)** As project sponsors prepare the environmental review document for their individual project pursuant to CEQA/NEPA and prior to environmental certification, project sponsors shall consider adopting appropriate measures that would minimize or eliminate cumulatively considerable environmental impacts pursuant to CEQA/NEPA. MTC shall be provided with status reports of compliance with mitigation measures pursuant to MTC Resolution 1481, Revised. Mitigation measures to reduce impacts on water resources that shall be considered by project sponsors and decision-makers may include, but are not limited to, requiring projects to comply with design guidelines established in the Bay Area Stormwater Management Agencies Association's (BASMAA) Using Start at the Source to Comply with Design Development Standards and the California Storm Water Best Management Practice Handbook for New Development and Redevelopment to minimize both increases in the volume and rate of stormwater runoff, and the amount of pollutants entering the storm drain system. Typical mitigation measures shall include the following:

#### Surface Water

- Drainage of roadway and parking lot runoff shall, wherever possible, be designed to run through grass median strips, contoured to provide adequate storage capacity and to provide overland flow, detention, and infiltration before it reaches culverts. Detention basins and ponds, aside from controlling runoff rates, can also remove particulate pollutants through settling. Facilities such as oil and sediment separators or absorbent filter systems shall therefore be designed and installed within the storm drainage system to provide filtration of stormwater prior to discharge and reduce water quality impacts whenever feasible. For example, runoff shall be filtered through mechanical or natural filtration systems such as premanufactured oil water separators or through natural processes such as bioswales and settlement ponds to remove oil and grease prior to discharge.
- Long-term sediment control shall include an erosion control and revegetation program designed to allow reestablishment of native vegetation on slopes in undeveloped areas.
- In areas where habitat for fish and other wildlife would be threatened by transportation facility discharge, alternate discharge options shall be sought to protect sensitive fish and wildlife populations. Maintenance activities over the life of the project shall include heavy-duty sweepers, with disposal of collected debris in sanitary landfills to effectively reduce annual pollutant loads where appropriate. Catch basins and storm drains shall be cleaned and maintained on a regular basis.
- Landscaped areas shall use Integrated Pest Management techniques (methods that minimize the use of potentially hazardous chemicals for landscape pest control and vineyard operations). The handling, storage, and application of potentially hazardous chemicals shall take place in accordance with all applicable laws and regulations.

## Groundwater

• Detention basins, infiltration strips, and other features to facilitate groundwater recharge shall be incorporated into the design of new freeway and roadway facilities whenever feasible.

## Flooding

- Projects shall be designed so that they do not increase downstream flooding risks by increasing peak runoff volumes. Including detention ponds in designs for roadway medians, parking areas, or other facilities, or increasing the size of local flood control facilities serving the project areas could achieve this measure. Existing pervious surface shall be preserved to the maximum extent feasible to minimize increases in stormwater runoff volumes and rates.
- Projects shall be designed to allow lateral transmission of stormwater flows across transportation corridors with no increased risk of upstream flooding. Culverts and bridges shall be designed to adequately carry drainage waters through project sites. The bottom of overpass structures should be elevated at least 1 foot above the 100-year flood elevation at all stream and drainage channel crossings.
- All roadbeds for new highway and rail transit facilities shall be elevated at least 1 foot above the 100-year base flood elevation.

## Impact Conclusion

This impact is potentially significant, but can be reduced to a level that is less than significant with implementation of the proposed mitigation measures.

# Findings

Changes or alterations have been required in, or incorporated into, the project that reduce the impact to a level that is less than significant (Finding (1)). The identified mitigation measures are within the responsibility and jurisdiction of other public agencies, and not MTC, and those agencies should adopt the measures (Finding (2)).

- A. The mitigation measures address site-specific factors that must be considered for each individual transportation project, rather than within the overall Transportation 2035 Plan. Therefore, implementation of the identified mitigation measures relies on the efforts of other agencies, namely the project sponsor(s) (lead agency) who will be responsible for complying with CEQA and NEPA, if applicable, for individual projects. MTC will use the Mitigation Monitoring Program to help to ensure that proposed mitigation measures are incorporated into project environmental review documents.
- B. The mitigation measures are appropriate for reducing the impacts identified at the program level. Specific mitigation measures that meet or exceed the requirements of these proposed measures will have to be implemented by project sponsors for impacts identified during the environmental evaluation of individual projects, particularly as they relate to details about project location. In order for project-level environmental review to tier off the program EIR for the Plan, however, it must incorporate the mitigation measures set forth therein (CEQA Guidelines Section 15168, subd. (c)(3)). Thus, the use of this EIR by project sponsors in preparing environmental documents of specific projects will help

ensure that project-specific mitigation measures will be implemented. With implementation of these measures, the impact will be reduced to a level that is less than significant.

C. The mitigation measures are particularly reliable because they are already encouraged by existing agencies and standards (e.g. design guidelines established in the Bay Area Stormwater Management Agencies Association's (BASMAA) Using Start at the Source to Comply with Design Development Standards and the California Storm Water Best Management Practice Handbook for New Development and Redevelopment) which are integral parts of the project development, review, and permitting processes. The mitigation measures help to ensure that these existing standards and regulations are met.

#### **Cumulative Impact**

2.8-3 Transportation 2035 Plan projects, combined with projected regional development, could contribute to degradation of regional water quality, reduction of groundwater recharge, or result in increased flooding hazards. (Draft EIR, p. 2.8-18)

#### **Mitigation Measures**

Despite feasible mitigation, the overall cumulative impact related to water quality and flood risk in the Bay Area is assumed to remain significant and unavoidable. However, the proposed Project's contribution to the overall significant cumulative impact is not cumulatively considerable with the implementation of the mitigation measures 2.8(a) and 2.8(b) provided above. (Draft EIR, p. 2.8-18)

#### **Impact Conclusion**

The overall cumulative impact will remain significant and unavoidable after the incorporation of feasible mitigation. The project's contribution, however, is not cumulatively considerable after the incorporation of feasible mitigation.

#### Findings

Changes or alterations have been required in, or incorporated into, the project that reduce the contribution of the proposed Project to not cumulatively considerable (Finding (1)). The identified mitigation measures are within the responsibility and jurisdiction of other public agencies, and not MTC, and those agencies should adopt the measures (Finding (2)).

- A. Cumulative population growth and development, regardless of the proposed Project, will occur in the region and will result in a substantial contribution to the identified cumulative impact.
- B. Proposed mitigation measures, along with conformity with existing federal, State, and local regulations, are expected to reduce the overall cumulative effect, as well as the Plan's contribution to the overall cumulative effect.
- C. The mitigation measures address site-specific factors that must be considered for each individual transportation project, rather than within the overall Transportation 2035 Plan. Therefore, implementation of the identified mitigation measures relies on the efforts of other agencies, namely the project sponsor(s) (lead agency) who will be responsible for

complying with CEQA and NEPA, if applicable, for individual projects. MTC will use the Mitigation Monitoring Program to help to ensure that proposed mitigation measures are incorporated into project environmental review documents.

- D. The mitigation measures are appropriate for reducing the impacts identified at the program level. Specific mitigation measures that meet or exceed the requirements of these proposed measures will have to be implemented by project sponsors for impacts identified during the environmental evaluation of individual projects, particularly as they relate to details about project location. In order for project-level environmental review to tier off the program EIR for the Plan, however, it must incorporate the mitigation measures set forth therein (CEQA Guidelines Section 15168, subd. (c)(3)). Thus, the use of this EIR by project sponsors in preparing environmental documents of specific projects will help ensure that project-specific mitigation measures will be implemented.
- E. The mitigation measures are particularly reliable because many are already enforced by existing agencies and regulatory standards which are integral parts of the project development, review, and permitting processes. The mitigation measures help to ensure that these existing standards and regulations are met.
- F. Implementation of the proposed Transportation 2035 Plan, with mitigation measures, will not result in a considerable contribution to this cumulative impact.

# **BIOLOGICAL RESOURCES**

#### Impact

2.9-1 Transportation 2035 Plan projects could adversely affect wetlands and aquatic resources. (Draft EIR, p. 2.9-24)

#### **Mitigation Measures**

**2.9(a)** As project sponsors prepare the environmental review document for their individual project pursuant to CEQA/NEPA and prior to environmental certification, project sponsors shall consider adopting appropriate measures that would minimize or eliminate cumulatively considerable environmental impacts pursuant to CEQA/NEPA. MTC shall be provided with status reports of compliance with mitigation measures pursuant to MTC Resolution 1481, Revised. Mitigation measures to reduce impacts on wetlands and aquatic resources that shall be considered by project sponsors and decision-makers may include, but are not limited to, those described below.

- In keeping with the "no net loss" policy, project designs shall be configured, whenever possible, to avoid sensitive wetlands and avoid disturbances to wetland and riparian corridors in order to preserve both the habitat and the overall ecological functions of these areas. Projects shall minimize ground disturbances and construction footprints near such areas to the extent practicable.
- Where avoidance of wetlands is not feasible, project sponsors will minimize fill and the use of in-water construction methods, and only do so with express permit approval from the appropriate resources agencies and in accordance with applicable existing regulations such as Coastal Zone regulations of wetland fill. Project sponsors shall arrange for off-site replacement of removed wetlands in accordance with the applicable existing regulation and subject to approval by the Corps, and possibly by the USFWS, RWQCB, and CDFG.

#### Impact Conclusion

This impact is potentially significant, but can be reduced to a level that is less than significant with implementation of the proposed mitigation measures.

#### Findings

Changes or alterations have been required in, or incorporated into, the project that reduce the impact to a level that is less than significant (Finding (1)). The identified mitigation measures are within the responsibility and jurisdiction of other public agencies, and not MTC, and those agencies can and should adopt the measures (Finding (2)).

## Facts in Support of Findings

- A. The mitigation measures address site-specific factors that must be considered for each individual transportation project, rather than within the overall Transportation 2035 Plan. Therefore, implementation of the identified mitigation measures relies on the efforts of other agencies, namely the project sponsor(s) (lead agency) who will be responsible for complying with CEQA and NEPA, if applicable, for individual projects. MTC will use the Mitigation Monitoring Program to help to ensure that proposed mitigation measures are incorporated into project environmental review documents.
- B. The mitigation measures are appropriate for reducing the impacts identified at the program level. Specific mitigation measures that meet or exceed the requirements of these proposed measures will have to be implemented by project sponsors for impacts identified during the environmental evaluation of individual projects, particularly as they relate to details about project location in relation to wetlands. In order for project-level environmental review to tier off the program EIR for the Plan, however, it must incorporate the mitigation measures set forth therein (CEQA Guidelines Section 15168, subd. (c)(3)). Thus, the use of this EIR by project sponsors in preparing environmental documents of specific projects will help ensure that project-specific mitigation measures will be implemented. With implementation of these measures, the impact will be reduced to a level that is less than significant.
- C. The mitigation measures are particularly reliable because they are already enforced by existing agencies and regulatory standards (e.g. "no net loss", enforced by the Corps, USFWS, RWQCB, and CDFG) which are integral parts of the project development, review, and permitting processes. Furthermore, federal and state laws (Clean Water Act, Porter-Cologne Act) do not allow fill of wetlands or other waters without a permit. The mitigation measures help to ensure that these existing standards and regulations are met.

#### Impact

# 2.9-2 Transportation 2035 Plan projects could cause substantial disturbance of biologically unique or sensitive communities. (Draft EIR, p. 2.9-25)

#### **Mitigation Measures**

**2.9(b)** As project sponsors prepare the environmental review document for their individual project pursuant to CEQA/NEPA and prior to environmental certification, project sponsors shall consider adopting appropriate measures that would minimize or eliminate cumulatively considerable environmental impacts pursuant to CEQA/NEPA. MTC shall be provided with status

reports of compliance with mitigation measures pursuant to MTC Resolution 1481, Revised. Mitigation measures to reduce impacts on biologically unique or sensitive communities that shall be considered by project sponsors and decision-makers may include, but are not limited to, those described below.

• In accordance with CDFG guidelines, project sponsors shall make an effort to minimize impacts on sensitive plant communities, especially riparian habitats, when designing and permitting projects. Where applicable, projects shall conform to the provisions of special area management or restoration plans such as the Suisun Marsh Protection Plan, which outlines specific measures to protect sensitive vegetation communities.

#### **Impact Conclusion**

This impact is potentially significant, but can be reduced to a level that is less than significant with implementation of the proposed mitigation measures.

#### Findings

Changes or alterations have been required in, or incorporated into, the project that reduce the impact to a level that is less than significant (Finding (1)). The identified mitigation measures are within the responsibility and jurisdiction of other public agencies, and not MTC, and those agencies can and should adopt the measures (Finding (2)).

- A. The mitigation measures address site-specific factors that must be considered for each individual transportation project, rather than within the overall Transportation 2035 Plan. Therefore, implementation of the identified mitigation measures relies on the efforts of other agencies, namely the project sponsor(s) (lead agency) who will be responsible for complying with CEQA and NEPA, if applicable, for individual projects. MTC will use the Mitigation Monitoring Program to help to ensure that proposed mitigation measures are incorporated into project environmental review documents.
- B. The mitigation measure is appropriate for reducing the impacts identified at the program level. Specific mitigation measures that meet or exceed the requirements of this proposed measure will have to be implemented by project sponsors for impacts identified during the environmental evaluation of individual projects, particularly as they relate to details about project location. In order for project-level environmental review to tier off the program EIR for the Plan, however, it must incorporate the mitigation measures set forth therein (CEQA Guidelines Section 15168, subd. (c)(3)). Thus, the use of this EIR by project sponsors in preparing environmental documents of specific projects will help ensure that project-specific mitigation measures will be implemented. With implementation of this measure, the impact will be reduced to a level that is less than significant.
- C. The mitigation measure is particularly reliable because it is already enforced by existing agencies and regulatory standards (e.g. special area management or restoration plans such as the Suisun Marsh Protection Plan) which are integral parts of the project development, review, and permitting processes. The mitigation measures help to ensure that these existing standards and regulations are met.

#### Impact

2.9-3 Transportation 2035 Plan projects could have deleterious impacts on special-status plant and/or wildlife species identified as endangered, candidate, and/or special status. (Draft EIR, p. 2.9-27)

#### **Mitigation Measures**

**2.9(c)** As project sponsors prepare the environmental review document for their individual project pursuant to CEQA/NEPA and prior to environmental certification, project sponsors shall consider adopting appropriate measures that would minimize or eliminate cumulatively considerable environmental impacts pursuant to CEQA/NEPA. MTC shall be provided with status reports of compliance with mitigation measures pursuant to MTC Resolution 1481, Revised. Mitigation measures to reduce impacts on special-status plant or animal species that shall be considered by project sponsors and decision-makers may include, but are not limited to, those described below.

- In support of CEQA, NEPA, CDFG and USFWS permitting processes for individual Transportation 2035 Plan transportation projects, biological and wetland surveys shall be conducted as part of the environmental review process to determine the presence and extent of sensitive habitats and/or species in the project vicinity. Surveys shall follow established methods and shall be undertaken at times when the subject species is most likely to be identified. In cases where impacts to State- or federal-listed plant or wildlife species are imminent, formal protocol-level surveys may be required on a species-by-species basis to determine the local distribution of these species. Consultation with the USFWS and/or CDFG shall be conducted early in the planning process at an informal level for transportation projects that could adversely affect federal or State candidate, threatened, or endangered species to determine the need for further consultation or permitting actions.
- When drafting mitigations, adaptive management strategies shall be used, when feasible, to capitalize on the progressive understanding of ecological systems and management practices, apply lessons learned from current and future projects and research studies, accommodate for uncertainties or unknowns, and improve progress toward desired ecological outcomes.
- Project designs shall be reconfigured, whenever possible, to avoid sensitive wetland or biological resources and avoid disturbances to wetland and riparian corridors. Projects shall minimize ground disturbances and construction footprints near sensitive areas to the extent practicable.
- To the extent practicable, project activities in the vicinity of sensitive resources shall be completed during the period that best avoids disturbance to plant and wildlife species present (e.g., May 15 to October 15 near salmonid habitat and vernal pools).
- Individual projects shall minimize the use of in-water construction methods in areas that support sensitive aquatic species, especially when listed species could be present.
- In the event that equipment needs to operate in any watercourse with flowing or standing water, a qualified biological resource monitor shall be present at all times to alert construction crews to the possible presence of California red-legged frog, nesting birds, salmonids, or other aquatic species at risk during construction operations.

- If project activities involve pile driving or vibratory hammering in or near water, interim hydroacoustic threshold criteria for fish should be adopted as set forth by the Interagency Fisheries Hydroacoustic Working Group, as well as other avoidance methods to reduce the adverse affects of construction to sensitive fish, peciverous birds, and marine mammal species.
- Construction periods shall not occur during the breeding season near riparian habitat, freshwater marshlands, and salt marsh habitats that support nesting bird species protected under the Endangered Species Act and Migratory Bird Treaty Act (e.g., yellow warbler, tricolored blackbird, California clapper rail, etc.).
- A qualified biologist shall locate and fence off sensitive resources before construction activities begin and, where required, shall inspect areas to ensure that barrier fencing, stakes, and setback buffers are maintained during construction.
- For work sites located adjacent to special-status plant or wildlife populations, a biological resource education program shall be provided for construction crews and contractors (primarily crew and construction foremen) before construction activities begin.
- Biological monitoring shall be particularly targeted for areas near identified habitat for federal- and state-listed species, and a "no take" approach shall be taken whenever feasible during construction near special-status plant and wildlife species.
- Efforts shall be made to minimize the negative effects of light and noise on listed and sensitive wildlife.

#### **Impact Conclusion**

Because the program-level review for the Plan cannot determine the feasibility and efficacy of the mitigation measures for specific projects, the impact may remain significant and unavoidable after implementing feasible mitigation measures.

#### Findings

Changes or alterations have been required in, or incorporated into, the project that may reduce the impact to a level that is less than significant (Finding (1)). The identified mitigation measures are within the responsibility and jurisdiction of other public agencies, and not MTC, and those agencies can and should adopt the measures (Finding (2)). Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers make infeasible further mitigation (Finding (3)).

#### Facts in Support of Findings

A. The EIR analysis took a conservative approach by assuming that, unless known to be absent, special status species exist in all areas that provide at least moderate quality habitat (Draft EIR, page 2.9-27). Potential impacts were determined by evaluating whether proposed transportation improvements would occur within the potential range of a special status species of concern, whether projects would directly encroach upon an area of ecological significance, or whether the projects could involve the filling of wetlands. As stated on EIR page 2.9-22, "in many cases, the project alignments, locations, or other design details are not known because the projects are in the early stages of planning or development. As a result, this impact analysis relies largely on the potential for biological impacts based on proximity to sensitive resources, an analysis method that inherently tends to inflate the potential for adverse effects. Thus, while such impacts may be identified in this EIR, upon project implementation it is anticipated that actual impacts will be incrementally smaller. Laws and regulations protecting special-status species, areas of ecological significance, and wetland resources are effective incentives for project proponents to design alternatives that either avoid or substantially reduce impacts on these resources."

- B. Due to the programmatic level of analysis in the EIR and lack of project-specific plans, it is not possible to define the exact extent of potential impact, so it is not possible to ascertain with certainty whether the identified mitigation measures for these impacts will reduce impacts to levels considered "not significant." However, it is likely that, with proper design and planning, many of the identified impacts can be avoided or minimized.
- C. The mitigation measures address site-specific factors that must be considered for each individual transportation project, rather than within the overall Transportation 2035 Plan. Therefore, implementation of the identified mitigation measures relies on the efforts of other agencies, namely the project sponsor(s) (lead agency) who will be responsible for complying with CEQA and NEPA, if applicable, for individual projects. MTC will use the Mitigation Monitoring Program to help to ensure that proposed mitigation measures are incorporated into project environmental review documents.
- D. The mitigation measures are appropriate for reducing the impacts identified at the program level. Specific mitigation measures that meet or exceed the requirements of these proposed measures will have to be implemented by project sponsors for impacts identified during the environmental evaluation of individual projects, particularly as they relate to details about project location. This future project-level environmental review will determine whether impacts can be mitigated to a less-than-significant level. In order for project-level environmental review to tier off the program EIR for the Plan, however, it must incorporate the mitigation measures set forth therein (CEQA Guidelines Section 15168, subd. (c)(3)). Thus, the use of this EIR by project sponsors in preparing environmental documents of specific projects will help ensure that project-specific mitigation measures will be implemented.
- E. The nature of the program-level evaluation of impacts is such that not enough is known about the specific project-level conditions to determine if the proposed mitigation measures will in fact be feasible and effective. Social, economic, legal, and technological conditions related to the ultimate design of individual projects will be factors in the feasibility of proposed mitigation measures at the project level. In particular, because the location of specific construction projects is still unknown, and the specific local seasonal locations of special status species is also unknown, and yet localized construction-related impacts are potentially destructive to special status species, this analysis cannot be sure of the ultimate effectiveness of the proposed mitigation measures.

#### Impact

## 2.9-4 Transportation 2035 Plan projects could have deleterious impacts on proposed or designated critical habitats. (Draft EIR, p. 2.9-29)

#### **Mitigation Measures**

Mitigation measures 2.9(a) through 2.9(c), above, are expected to reduce impacts on steelhead critical habitat to less-than-significant. Specific projects that may be located within other critical

habitat areas will be subject to established protocols for surveys and protective measures. As described in these mitigation measures, project designs shall be reconfigured to avoid or minimize adverse affects to the primary constituent elements of designated critical habitats to the extent practicable, and consultation with the USFWS shall be conducted early in the process at an informal level to determine the need for further mitigation, consultation, or permitting action. No further program-level mitigation measures are required.

## Impact Conclusion

This impact is potentially significant, but can be reduced to a level that is less than significant with implementation of the proposed mitigation measures.

## Findings

Changes or alterations have been required in, or incorporated into, the project that reduce the impact to a level that is less than significant (Finding (1)). The identified mitigation measures are within the responsibility and jurisdiction of other public agencies, and not MTC, and those agencies can and should adopt the measures (Finding (2)).

#### Facts in Support of Findings

- A. The mitigation measures address site-specific factors that must be considered for each individual transportation project, rather than within the overall Transportation 2035 Plan. Therefore, implementation of the identified mitigation measures relies on the efforts of other agencies, namely the project sponsor(s) (lead agency) who will be responsible for complying with CEQA and NEPA, if applicable, for individual projects. MTC will use the Mitigation Monitoring Program to help to ensure that proposed mitigation measures are incorporated into project environmental review documents.
- B. The mitigation measures are appropriate for reducing the impacts identified at the program level. Specific mitigation measures that meet or exceed the requirements of these proposed measures will have to be implemented by project sponsors for impacts identified during the environmental evaluation of individual projects, particularly as they relate to details about project location. In order for project-level environmental review to tier off the program EIR for the Plan, however, it must incorporate the mitigation measures set forth therein (CEQA Guidelines Section 15168, subd. (c)(3)). Thus, the use of this EIR by project sponsors in preparing environmental documents of specific projects will help ensure that project-specific mitigation measures will be implemented. With implementation of these measures, the impact will be reduced to a level that is less than significant.
- C. The mitigation measures are particularly reliable because many are already enforced by existing agencies and regulatory standards which are integral parts of the project development, review, and permitting processes. The mitigation measures help to ensure that these existing standards and regulations are met.

#### Impact

2.9-5 Construction activities could adversely affect nonlisted nesting raptor species considered special-status by CDFG under CDFG Code 3503.5. (Draft EIR, p. 2.9-30)

# **Mitigation Measures**

**2.9(d)** As project sponsors prepare the environmental review document for their individual project pursuant to CEQA/NEPA and prior to environmental certification, project sponsors shall consider adopting appropriate measures that would minimize or eliminate cumulatively considerable environmental impacts pursuant to CEQA/NEPA. MTC shall be provided with status reports of compliance with mitigation measures pursuant to MTC Resolution 1481, Revised. Mitigation measures to reduce impacts on nonlisted nesting raptor species that shall be considered by project sponsors and decision-makers may include, but are not limited to, those described below.

- To avoid and minimize impacts to nesting raptors, preconstruction surveys shall be performed prior to initiating construction activities during the breeding season (February 1 through August 31). If it is determined that young have fledged and are self-sufficient, no further mitigation would be required.
- To avoid and minimize potential impacts to nesting raptors, a no-disturbance buffer zone shall be established around active nests during the breeding season.
- The size of individual buffers could be adjusted based on an evaluation of the site by a qualified raptor biologist in cooperation with the USFWS and CDFG.

#### Impact Conclusion

This impact is potentially significant, but can be reduced to a level that is less than significant with implementation of the proposed mitigation measures.

#### Findings

Changes or alterations have been required in, or incorporated into, the project that reduce the impact to a level that is less than significant (Finding (1)). The identified mitigation measures are within the responsibility and jurisdiction of other public agencies, and not MTC, and those agencies can and should adopt the measures (Finding (2)).

- A. The mitigation measures address site-specific factors that must be considered for each individual transportation project, rather than within the overall Transportation 2035 Plan. Therefore, implementation of the identified mitigation measures relies on the efforts of other agencies, namely the project sponsor(s) (lead agency) who will be responsible for complying with CEQA and NEPA, if applicable, for individual projects. MTC will use the Mitigation Monitoring Program to help to ensure that proposed mitigation measures are incorporated into project environmental review documents.
- B. The mitigation measures are appropriate for reducing the impacts identified at the program level. Specific mitigation measures that meet or exceed the requirements of these proposed measures will have to be implemented by project sponsors for impacts identified during the environmental evaluation of individual projects, particularly as they relate to details about project location. The use of this EIR by project sponsors in preparing environmental documents of specific projects will help ensure that project-specific mitigation measures will be implemented. With implementation of these measures, the impact will be reduced to a level that is less than significant.

#### Impact

2.9-6 Construction activities could adversely affect non-listed nesting birds species, considered special-status by the USFWS under the federal Migratory Bird Treaty Act, and by CDFG under the CDFG Code 3503 and 3513. (Draft EIR, p. 2.9-31)

## **Mitigation Measures**

**2.9(e)** As project sponsors prepare the environmental review document for their individual project pursuant to CEQA/NEPA and prior to environmental certification, project sponsors shall consider adopting appropriate measures that would minimize or eliminate cumulatively considerable environmental impacts pursuant to CEQA/NEPA. MTC shall be provided with status reports of compliance with mitigation measures pursuant to MTC Resolution 1481, Revised. At the time of project certification, project sponsors shall agree to comply with mitigation measures to avoid impacts to nesting bird species protected under the federal Migratory Bird Treaty Act, as follows:

• Concurrent with surveys described in Mitigation Measure 2.9(d), surveys shall be performed for migratory birds listed in the federal List of Migratory Birds (50 Code of Federal Regulations, Chapter 1, Part 10 Section 10.13). More than 500 native and migratory bird species are protected by this statute. If protected breeding birds are detected during surveys, a buffer zone, depending upon the species identified, shall be established around active nesting sites in coordination with CDFG and the USFWS.

# Impact Conclusion

This impact is potentially significant, but can be reduced to a level that is less than significant with implementation of the proposed mitigation measures.

#### Findings

Changes or alterations have been required in, or incorporated into, the project that reduce the impact to a level that is less than significant (Finding (1)). The identified mitigation measures are within the responsibility and jurisdiction of other public agencies, and not MTC, and those agencies can and should adopt the measures (Finding (2)).

- A. By establishing appropriate buffers during the breeding season, based on expert agency input, species will be protected from development impacts that could affect breeding.
- B. The mitigation measures address site-specific factors that must be considered for each individual transportation project, rather than within the overall Transportation 2035 Plan. Therefore, implementation of the identified mitigation measures relies on the efforts of other agencies, namely the project sponsor(s) (lead agency) who will be responsible for complying with CEQA and NEPA, if applicable, for individual projects. MTC will use the Mitigation Monitoring Program to help to ensure that proposed mitigation measures are incorporated into project environmental review documents.
- C. The mitigation measures are appropriate for reducing the impacts identified at the program level. Specific mitigation measures that meet or exceed the requirements of these proposed measures will have to be implemented by project sponsors for impacts identi-

fied during the environmental evaluation of individual projects, particularly as they relate to details about project location. In order for project-level environmental review to tier off the program EIR for the Plan, however, it must incorporate the mitigation measures set forth therein (CEQA Guidelines Section 15168, subd. (c)(3)). Thus, the use of this EIR by project sponsors in preparing environmental documents of specific projects will help ensure that project-specific mitigation measures will be implemented. With implementation of these measures, the impact will be reduced to a level that is less than significant.

#### Impact

# 2.9-7 Implementation of the Transportation 2035 Plan could conflict with adopted resource protection or conservation plans. (Draft EIR p. 2.9-31)

#### Mitigation Measures

As project sponsors prepare the environmental review document for their individual project pursuant to CEQA/NEPA and prior to environmental certification, project sponsors shall consider adopting appropriate measures that would minimize or eliminate cumulatively considerable environmental impacts pursuant to CEQA/NEPA. MTC shall be provided with status reports of compliance with mitigation measures pursuant to MTC Resolution 1481, Revised. Mitigation measures to reduce conflicts with adopted resource protection or conservation plans shall be considered by project sponsors and decision-makers may include, but are not limited to, those described below.

**2.9(f)** Project sponsors whose projects are located within the coastal zone shall carefully review the applicable local coastal program for potential conflicts, and involve the California Coastal Commission as early as possible in the project-level EIR process.

**2.9(g)** Relevant Conservation Measures, including species surveys and road design requirements, shall also apply, wherever feasible, to *non-covered* MTC transportation projects that fall within the ECCC HCP boundaries, as well as Plan projects outside the ECCC HCP boundaries, because. issues related to wildlife road mortality, habitat fragmentation, wildlife corridor connectivity, and pre-and post-project wildlife monitoring are applicable to all transportation projects, not just those located within the HCP coverage area. For rural infrastructure projects, this includes but is not limited to the following Conservation Measure:

## Conservation Measure 1.14: Design Requirements for Covered Roads outside the UDA

#### Siting Requirements

- Planned roads will be located in the least environmentally sensitive location feasible and will avoid, to the greatest extent feasible, impacts on covered species and sensitive natural communities such as wetlands. Alignments will follow existing roads, easements, rights-of-way, and disturbed areas as appropriate to minimize additional habitat fragmentation. The footprint of disturbance will be minimized to the maximum extent practicable.
- Equipment storage, fueling, and staging areas will be sited on disturbed areas or on ruderal or non-sensitive nonnative grassland land cover types, when these sites are available, to minimize risk of direct discharge into riparian areas or other sensitive land cover types.

- Project surveys, including land cover mapping, will be conducted during the conceptual planning stage of each project (i.e., well in advance of project design) so that the results can inform the siting and design process. Project surveys should be conducted in as wide a study corridor as possible to enable project siting to minimize environmental impacts.
- All planning survey requirements of this Plan will be followed within the construction corridor (i.e., the limit of project construction plus equipment staging areas and access roads) and the entire road right-of-way. Expanding the survey area beyond the project footprint will help identify covered species and their habitats so that impacts on covered species that occur adjacent to the construction zone can be minimized.
- For certain road projects, identified in Table 6-6 of the HCP, data collection will be required on wildlife movement through the road study corridor for at least one year prior to project design. Wildlife movement will be studied at the site to determine which species move across it, when they move, and, most importantly, which landscape features are most often used. These data will be used to select the most appropriate design requirements for the species and conditions unique to the site (see below).
- Transportation project proponents will consult early with the HCP/NCCP Implementing Entity, CDFG, and USFWS on individual projects to ensure that conceptual designs (siting) and project designs (construction and staging areas) meet the terms of the HCP.

#### Design Requirements for Wildlife Movement and Impact Minimization

- Design requirements will be updated or changed by designs shown by the best available science to be more effective at facilitating safe wildlife movement across roads. The effectiveness of road crossings for wildlife is an active area of research, so frequent advances in design are expected throughout the permit term. Further, improvements will be design to be durable, simple, and require the least amount of routine maintenance possible to ensure long-term functionality.
- Wildlife crossing needs will be assessed for each road project as a whole (for those projects subject to this provision, not by road segment, and for each wildlife species likely to need to cross the facility. Data will be collected on wildlife movements at the proposed project site for at least 1 year. These data will inform the design of wildlife movement structures suitable for the site and the species that use the area.
- Road undercrossings will be constructed at frequent intervals to allow wildlife movement. A combination of large structures (bridges, large culverts, or large tunnels) spaced at greater intervals and small structures (small culverts or tunnels) spaced at frequent intervals will be used to accommodate a wide variety of wildlife species. However, placement of undercrossings in areas where wildlife are most likely to use them is more important than maintaining a certain frequency or spacing. Wildlife crossings that serve multiple species should be used whenever possible. Crossing facilities should be installed at known travel routes, natural pinch points, or other topographically appropriate locations to maximize the chance of use. Suitable areas may include stream crossings or natural drainages. Undercrossings should be placed at grade whenever possible to maximize their use by wildlife.
- Bridges, viaducts, or causeways will be used for certain projects to provide the most natural passageways for wildlife (i.e., to allow natural vegetation and physical features to occur in the undercrossing). If possible, bridges will span the bed and bank of streams and avoid or minimize bridge piers or footings within the stream, within bridge safety limits. If possible, the

span of bridges that cross streams should also include some upland habitat beneath their spans to provide dry areas for wildlife species that do not use creeks or for use during storms. Native plantings, natural debris, or rocks should be installed under bridges to provide wildlife cover and encourage the use of crossings.

- Large wildlife crossings (for medium to large mammals) will be placed approximately once every mile along new or substantially expanded roads that cross wildlife movement routes. Small wildlife crossings will be placed approximately every 1,000 feet along new or substantially expanded roads. This is the same interval of undercrossings suitable for California tiger salamander installed along Vasco Road in the inventory area (65 undercrossings in 13 miles). Within these parameters, undercrossings should be placed where wildlife are most likely to use them, rather than evenly spaced. The required interval can be used as an average if it can be demonstrated that strict adherence to the requirement will not benefit wildlife movement.
- Tunnels or culverts must be the minimum length, height, and width necessary to provide safe passage under the road. Culvert designs will be based on the best available data at the time. Current thinking recommends that culverts designed for medium-size mammals such as San Joaquin kit fox, coyote, raccoon, be 5–8 feet in diameter (although culverts larger than 8 feet in diameter may be needed for longer crossings). Culverts designed for small mammals are recommended at 18–48 inches in diameter; smaller structures may be preferred by smaller wildlife species. Culverts should, when feasible, provide a natural substrate on which wildlife can travel (e.g., open bottom). It is also recommended that wildlife undercrossings using tunnels or culverts use grating on the inactive part of the roadbed (e.g., road shoulders) to allow filtration of ambient light and moisture but minimize noise intrusion. Artificial lighting inside tunnels or culverts is not recommended; these devices have not been shown to be effective and may deter nocturnal wildlife.
- Fencing will be used along the roadway to direct wildlife to undercrossings and minimize their access to the road (see Table 6-6 for applicability). Fencing designs will be customized for the wildlife expected to use the undercrossing and will be based on the best available data at the time. Fencing must be continuous along the road and must be attached to the undercrossing to facilitate its use. Fencing must also extend well beyond the target undercrossing to reduce the chance of wildlife moving around the fence. For example, four fencing designs have been installed along Vasco Road and monitored for their effectiveness in reducing mortality of California tiger salamanders. Fencing must be monitored regularly by the applicant and repairs made promptly to ensure effectiveness. Wildlife undercrossings must be at the same or similar elevation as the fencing (e.g., along elevated roadways) to increase chances of their use. Vegetation must be managed along small mammal and amphibian fencing to reduce the opportunity for these species to climb the fence. Fencing designed for small mammal or amphibian exclusion must be installed at least 8 inches deep into the soil to prevent small mammal burrows providing access under the fence. Where roads cross the wildlife exclusion fences, gates should be used whenever possible with material at the base of the gate to minimize the gap between the gate and the roadbed. If gates are not feasible, an in-roadway barrier (e.g., wildlife grates or similar devices) or device that channels species away must be installed to deter wildlife from moving around fences into the road.
- When compatible with vehicle safety, road medians should allow wildlife to cross under or over the median in the event they become trapped on the roadway.

## **Construction Requirements**

The following measures are specifically required for rural road and transportation projects. Other conservation measures described in the ECCC HCP for covered activities also apply.

- No erodible materials will be deposited into watercourses. Brush, loose soils, or other debris material will not be stockpiled within stream channels or on adjacent banks.
- All no-take species will be avoided.
- Construction activities will comply with the Migratory Bird Treaty Act and will consider seasonal requirements for birds and migratory non-resident species, including covered species.
- Temporary stream diversions, if required, will use sand bags or other approved methods that minimize in-stream impacts and effects on wildlife.
- Silt fencing or other sediment trapping method will be installed downgradient from construction activities to minimize the transport of sediment off site.
- Barriers will be constructed to keep wildlife out of construction sites, as appropriate.
- Onsite monitoring will be conducted throughout the construction period to ensure that disturbance limits, BMPs, and Plan restrictions are being implemented properly.
- Active construction areas will be watered regularly to minimize the impact of dust on adjacent vegetation and wildlife habitats, if warranted.
- The following construction measure will be applied differently to each rural road project, as specified in Table 6-6 of the ECCC HCP.
- Install sturdy lock-boxes for cameras at each large wildlife undercrossing to facilitate wildlife monitoring by the Implementing Entity. Boxes shall be designed for monitoring equipment to be used, include a removable door, and be prewired for electricity (solar, battery, or alternating current). This will provide for the least intrusive, most secure, most flexible, and most cost-effective way to monitor wildlife usage, while minimizing human impacts. Boxes will be mounted on adjustable pedestals to vary the height of the box to facilitate monitoring of target species of varying size.

### **Post-construction Requirements**

- Roadside vegetation within the right-of-way and adjacent to HCP/NCCP Preserves or other open space areas will be controlled to prevent the spread of invasive exotic plants such as yellow star-thistle into nearby or adjacent preserves.
- Vegetation and debris must be managed in and near culverts and under and near bridges to ensure that entryways remain open and visible to wildlife and the passage through the culvert or under the bridge remains clear.
- Cut-and-fill slopes will be revegetated with native, non-invasive nonnative, or non-reproductive (i.e., sterile hybrids) plants suitable for the altered soil conditions.
- All structures constructed for wildlife movement (tunnels, culverts, underpasses, fences) must be monitored at regular intervals and repairs made promptly to ensure that the structure is in proper condition.

## **Impact Conclusion**

This impact is potentially significant, but can be reduced to a level that is less than significant with implementation of the proposed mitigation measures.

#### Findings

Changes or alterations have been required in, or incorporated into, the project that reduce the impact to a level that is less than significant (Finding (1)). The identified mitigation measures are within the responsibility and jurisdiction of other public agencies, and not MTC, and those agencies should adopt the measures (Finding (2)).

#### Facts in Support of Findings

- A. The mitigation measures address site-specific factors that must be considered for each individual transportation project, rather than within the overall Transportation 2035 Plan. Therefore, implementation of the identified mitigation measures relies on the efforts of other agencies, namely the project sponsor(s) (lead agency) who will be responsible for complying with CEQA and NEPA, if applicable, for individual projects. MTC will use the Mitigation Monitoring Program to help to ensure that proposed mitigation measures are incorporated into project environmental review documents.
- B. The mitigation measures are appropriate for reducing the impacts identified at the program level. Specific mitigation measures that meet or exceed the requirements of these proposed measures will have to be implemented by project sponsors for impacts identified during the environmental evaluation of individual projects, particularly as they relate to details about project location. In order for project-level environmental review to tier off the program EIR for the Plan, however, it must incorporate the mitigation measures set forth therein (CEQA Guidelines Section 15168, subd. (c)(3)). Thus, the use of this EIR by project sponsors in preparing environmental documents of specific projects will help ensure that project-specific mitigation measures will be implemented. With implementation of these measures, the impact will be reduced to a level that is less than significant.
- C. The mitigation measures are particularly reliable because they are already enforced by existing planning documents consistency with which is an integral part of the project development, review, and permitting processes. The mitigation measures help to ensure that these existing standards are met.

#### Cumulative Impact

## 2.9-8 Transportation 2035 Plan projects, combined with forecast urban development, could contribute to the removal or fragmentation of habitat area. (Draft EIR, p. 2.9-37)

The extent of this cumulative impact cannot be determined with any precision at this time. To represent a reasonable worst case scenario, the impact was identified as potentially significant.

#### **Mitigation Measures**

As the cumulative impacts of the transportation improvements in the proposed Transportation 2035 Plan are the same as the direct impacts listed above (Impact 2.9-3), the mitigation measures for this impact would also be the same (see Mitigation 2.9(c)). Generally, these mitigation measures would be expected to reduce this potentially significant cumulative impact on biological re-

sources to a less-than-significant level if incorporated by project sponsors. However, similar to the proposed project direct impacts on sensitive species (Impact 2.9-3), potential cumulative impacts on special status wildlife species through the removal or fragmentation of their habitat areas would be significant and unavoidable. (Draft EIR, p. 2.9-38)

#### **Impact Conclusion**

The overall cumulative impact will remain significant and unavoidable after the incorporation of feasible mitigation. The project's contribution also remains cumulatively considerable after the incorporation of feasible mitigation.

#### Findings

Changes or alterations have been required in, or incorporated into, the project that reduce the project's contribution to the cumulative impact (Finding (1)). The identified mitigation measures are within the responsibility and jurisdiction of other public agencies, and not MTC, and those agencies can and should adopt the measures (Finding (2)). Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers make infeasible further mitigation measures to reduce the project's contribution to a less than cumulatively considerable level (Finding (3)).

#### Facts in Support of Findings

- A. Cumulative population growth and development, regardless of the proposed Project, will occur in the region and will result in a substantial contribution to the identified cumulative impact.
- B. The EIR analysis took a conservative approach by assuming that, unless known to be absent, special status species exist in all areas that provide at least moderate quality habitat (Draft EIR, page 2.9-27). Potential impacts were determined by evaluating whether proposed transportation improvements would occur within the potential range of a special status species of concern, whether projects would directly encroach upon an area of ecological significance, or whether the projects could involve the filling of wetlands. As stated on EIR page 2.9-22, "in many cases, the project alignments, locations, or other design details are not known because the projects are in the early stages of planning or development. As a result, this impact analysis relies largely on the potential for biological impacts based on proximity to sensitive resources, an analysis method that inherently tends to inflate the potential for adverse effects. Thus, while such impacts may be identified in this EIR, upon project implementation it is anticipated that actual impacts will be incrementally smaller. Laws and regulations protecting special-status species, areas of ecological significance, and wetland resources are effective incentives for project proponents to design alternatives that either avoid or substantially reduce impacts on these resources."
- C. Proposed mitigation measures, along with conformity with existing federal, State, and local regulations, are expected to reduce the overall cumulative effect, as well as the Plan's contribution to the overall cumulative effect.
- D. However, due to the programmatic level of analysis in the EIR and lack of project-specific plans, it is not possible to define the exact extent of potential impact, so it is not possible to ascertain with certainty whether the identified mitigation measures for these impacts will reduce impacts to levels considered "not significant." However, it is likely that, with

proper design and planning, much of the identified potential impact can be avoided or minimized.

- E. The mitigation measures address site-specific factors that must be considered for each individual transportation project, rather than within the overall Transportation 2035 Plan. Therefore, implementation of the identified mitigation measures relies on the efforts of other agencies, namely the project sponsor(s) (lead agency) who will be responsible for complying with CEQA and NEPA, if applicable, for individual projects. MTC will use the Mitigation Monitoring Program to help to ensure that proposed mitigation measures are incorporated into project environmental review documents.
- F. The mitigation measures are appropriate for reducing the impacts identified at the program level. Specific mitigation measures that meet or exceed the requirements of these proposed measures will have to be implemented by project sponsors for impacts identified during the environmental evaluation of individual projects, particularly as they relate to details about project location. This future project-level environmental review will determine whether impacts can be mitigated to a less-than-significant level. In order for project-level environmental review to tier off the program EIR for the Plan, however, it must incorporate the mitigation measures set forth therein (CEQA Guidelines Section 15168, subd. (c)(3)). Thus, the use of this EIR by project sponsors in preparing environmental documents of specific projects will help ensure that project-specific mitigation measures will be implemented.
- G. The mitigation measures are particularly reliable because many are already enforced by existing agencies and regulatory standards which are integral parts of the project development, review, and permitting processes. The mitigation measures help to ensure that these existing standards and regulations are met.
- H. The nature of the program-level evaluation of impacts is such that not enough is known about the specific project-level conditions to determine if the proposed mitigation measures will in fact be feasible and effective. Social, economic, legal, and technological conditions related to the ultimate design of individual projects will be factors in the feasibility of proposed mitigation measures at the project level. In particular, because the precise location of specific construction projects is still largely unknown, the feasibility and effectiveness of alternative alignments to specific projects is also largely unknown, and yet localized construction-related impacts could cause regionally substantial fragmentation of habitat area, particularly as it serves special status species, this analysis therefore cannot be sure of the ultimate effectiveness of the proposed mitigation measures.

## VISUAL RESOURCES

#### Impact

2.10-1 Transportation 2035 Plan projects could affect visual resources during their construction. (Draft EIR, p. 2.10-9)

## **Mitigation Measures**

**2.10(a)** As project sponsors prepare the environmental review document for their individual project pursuant to CEQA/NEPA and prior to environmental certification, project sponsors shall consider adopting appropriate measures that would minimize or eliminate cumulatively considerable environmental impacts pursuant to CEQA/NEPA. MTC shall be provided with status

reports of compliance with mitigation measures pursuant to MTC Resolution 1481, Revised. Mitigation measures to reduce significant visual impacts that shall be considered by project sponsors and decision-makers may include programs for reducing the visibility of construction staging areas, for fencing and screening these areas with low contrast materials consistent with the surrounding environment, and for revegetating graded slopes and exposed earth surfaces at the earliest opportunity.

## Impact Conclusion

This impact is potentially significant, but can be reduced to a level that is less than significant with implementation of the proposed mitigation measures.

## Findings

Changes or alterations have been required in, or incorporated into, the project that reduce the impact to a level that is less than significant (Finding (1)). The identified mitigation measures are within the responsibility and jurisdiction of other public agencies, and not MTC, and those agencies should adopt the measures (Finding (2)).

## Facts in Support of Findings

- A. The mitigation measures address site-specific factors that must be considered for each individual transportation project, rather than within the overall Transportation 2035 Plan. Therefore, implementation of the identified mitigation measures relies on the efforts of other agencies, namely the project sponsor(s) (lead agency) who will be responsible for complying with CEQA and NEPA, if applicable, for individual projects. MTC will use the Mitigation Monitoring Program to help to ensure that proposed mitigation measures are incorporated into project environmental review documents.
- B. The mitigation measures are appropriate for reducing the impacts identified at the program level. Specific mitigation measures that meet or exceed the requirements of these proposed measures will have to be implemented by project sponsors for impacts identified during the environmental evaluation of individual projects, particularly as they relate to details about project location. In order for project-level environmental review to tier off the program EIR for the Plan, however, it must incorporate the mitigation measures set forth therein (CEQA Guidelines Section 15168, subd. (c)(3)). Thus, the use of this EIR by project sponsors in preparing environmental documents of specific projects will help ensure that project-specific mitigation measures will be implemented. With implementation of these measures, the impact will be reduced to a level that is less than significant.

## Impact

2.10-2 Construction of certain Transportation 2035 Plan projects could adversely affect visual resources by adding or expanding transportation facilities in rural or open space areas, blocking public views, or changing the visual character and quality of designated or eligible State Scenic Highways. (Draft EIR, p. 2.10-9)

## **Mitigation Measures**

**2.10(b)** As project sponsors prepare the environmental review document for their individual project pursuant to CEQA/NEPA and prior to environmental certification, project sponsors shall

consider adopting appropriate measures that would minimize or eliminate cumulatively considerable environmental impacts pursuant to CEQA/NEPA. MTC shall be provided with status reports of compliance with mitigation measures pursuant to MTC Resolution 1481, Revised. Mitigation measures to reduce significant visual impacts that shall be considered by project sponsors and decision-makers may include, but are not limited to, those described below.

- Design projects to minimize contrasts in scale and massing between the project and surrounding natural forms and development.
- Site or design projects to minimize their intrusion into important viewsheds;
- Use see-through safety barrier designs (e.g. railings rather than walls) when possible;
- Develop interchanges and transit lines at the grade of the surrounding land to limit view blockage wherever possible;
- Contour the edges of major cut and fill slopes to provide a more natural looking finished profile and use natural shapes, textures, colors, and scale to minimize contrasts between the project and surrounding areas;
- Design landscaping along highway corridors to add significant natural elements and visual interest to soften the hard edged, linear travel experience that would otherwise occur;
- Complete design studies for projects in designated or eligible State Scenic Highway corridors. Consider the "complete" highway system and develop mitigation measures to minimize impacts on the quality of the views or visual experience that originally qualified the highway for Scenic designation.

## Impact Conclusion

The impact may remain significant and unavoidable after implementing feasible mitigation measures.

## Findings

The identified mitigation measures are within the responsibility and jurisdiction of other public agencies, and not MTC, and those agencies should adopt the measures (Finding (2)). Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers make infeasible further mitigation to reduce the impact to less than significant (Finding (3)).

## Facts in Support of Findings

- A. The mitigation measures address site-specific factors that must be considered for each individual transportation project, rather than within the overall Transportation 2035 Plan. Therefore, implementation of the identified mitigation measures relies on the efforts of other agencies, namely the project sponsor(s) (lead agency) who will be responsible for complying with CEQA and NEPA, if applicable, for individual projects. MTC will use the Mitigation Monitoring Program to help to ensure that proposed mitigation measures are incorporated into project environmental review documents.
- B. The mitigation measures are appropriate for reducing the impacts identified at the program level. Specific mitigation measures that meet or exceed the requirements of these

proposed measures will have to be implemented by project sponsors for impacts identified during the environmental evaluation of individual projects, particularly as they relate to details about project location. This future project-level environmental review will determine whether impacts can be mitigated to a less-than-significant level. In order for project-level environmental review to tier off the program EIR for the Plan, however, it must incorporate the mitigation measures set forth therein (CEQA Guidelines Section 15168, subd. (c)(3)). Thus, the use of this EIR by project sponsors in preparing environmental documents of specific projects will help ensure that project-specific mitigation measures will be implemented.

C. The nature of the program-level evaluation of impacts is such that not enough is known about the specific project-level conditions to determine if the proposed mitigation measures will in fact be feasible and effective. Social, economic, legal, and technological conditions related to the ultimate design of individual projects will be factors in the feasibility of proposed mitigation measures at the project level. In particular, with visual impacts of transportation projects, a lot depends on the setting, as well as the culture and values of the communities adjacent to the transportation corridor where a project is constructed.

## Impact

## 2.10-3 The construction of soundwalls along freeways and arterials could significantly alter views. (Draft EIR, p. 2.10-12)

#### **Mitigation Measures**

**2.10(c)** As project sponsors prepare the environmental review document for their individual project pursuant to CEQA/NEPA and prior to environmental certification, project sponsors shall consider adopting appropriate measures that would minimize or eliminate cumulatively considerable environmental impacts pursuant to CEQA/NEPA. MTC shall be provided with status reports of compliance with mitigation measures pursuant to MTC Resolution 1481, Revised. Mitigation measures to reduce significant visual impacts associated with soundwalls that shall be considered by project sponsors and decision-makers may include, but are not limited to, those described below.

- Develop new or expanded roadways below the grade of surrounding areas to minimize the need for tall soundwalls.
- Use transparent panels to preserve views where soundwalls would block views from residences.
- Use landscaped earth berm or a combination wall and berm to minimize the apparent soundwall height.
- Construct soundwalls of materials whose color and texture complements the surrounding landscape and development.
- Design soundwalls to increase visual interest, reduce apparent height, and be visually compatible with the surrounding area.
- Landscape the soundwalls with plants that screen the soundwall, preferably with either native vegetation or landscaping that complements the dominant landscaping of surrounding areas.

### Impact Conclusion

This impact is potentially significant, but can be reduced to a level that is less than significant with implementation of the proposed mitigation measures.

#### Findings

Changes or alterations have been required in, or incorporated into, the project that reduce the impact to a level that is less than significant (Finding (1)). The identified mitigation measures are within the responsibility and jurisdiction of other public agencies, and not MTC, and those agencies can and should adopt the measures (Finding (2)).

#### Facts in Support of Findings

- A. The mitigation measures address site-specific factors that must be considered for each individual transportation project, rather than within the overall Transportation 2035 Plan. Therefore, implementation of the identified mitigation measures relies on the efforts of other agencies, namely the project sponsor(s) (lead agency) who will be responsible for complying with CEQA and NEPA, if applicable, for individual projects. MTC will use the Mitigation Monitoring Program to help to ensure that proposed mitigation measures are incorporated into project environmental review documents.
- B. The mitigation measures are appropriate for reducing the impacts identified at the program level. Specific mitigation measures that meet or exceed the requirements of these proposed measures will have to be implemented by project sponsors for impacts identified during the environmental evaluation of individual projects, particularly as they relate to details about project location. In order for project-level environmental review to tier off the program EIR for the Plan, however, it must incorporate the mitigation measures set forth therein (CEQA Guidelines Section 15168, subd. (c)(3)). Thus, the use of this EIR by project sponsors in preparing environmental documents of specific projects will help ensure that project-specific mitigation measures will be implemented. With implementation of these measures, the impact will be reduced to a level that is less than significant.
- C. The nature of the program-level evaluation of impacts is such that not enough is known about the specific project-level conditions to determine if the proposed mitigation measures will in fact be feasible. Social, economic, legal, and technological conditions related to the ultimate design of individual projects will be factors in the feasibility of proposed mitigation measures at the project level. In particular, with visual impacts of transportation projects related to soundwalls, a lot depends on the land use needs, values, and previous experiences of the communities adjacent to the transportation corridor where a project is constructed.

#### Cumulative Impact

2.10-4 Concurrent implementation of the proposed Transportation 2035 Plan and regional and local land use plans would result in a cumulatively considerable change in the visual character of many areas in the region. (Draft EIR, p. 2.10-13)

#### **Mitigation Measures**

**2.10(a)** through **2.10(c)**, listed above.

## Impact Conclusion

The overall cumulative impact will remain significant and unavoidable after the incorporation of feasible mitigation. The project's contribution, however, is not cumulatively considerable after the incorporation of feasible mitigation.

## Findings

Changes or alterations have been required in, or incorporated into, the project that reduce the project's contribution to less than cumulatively considerable (Finding (1)). The identified mitigation measures are within the responsibility and jurisdiction of other public agencies, and not MTC, and those agencies should adopt the measures (Finding (2)). Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers make infeasible further mitigation to reduce the cumulative impact to less than significant (Finding (3)).

## Facts in Support of Findings

- A. Cumulative population growth and development, regardless of the proposed Project, will occur in the region and will result in a substantial contribution to the identified cumulative impact.
- B. The extent of this cumulative impact cannot be determined with any precision at this time. To represent a reasonable worst case scenario, the impact was identified as potentially significant.
- C. Proposed mitigation measures, along with conformity with existing federal, State, and local regulations, are expected to reduce the overall cumulative effect, as well as the Plan's contribution to the overall cumulative effect.
- D. The mitigation measures address site-specific factors that must be considered for each individual transportation project, rather than within the overall Transportation 2035 Plan. Therefore, implementation of the identified mitigation measures relies on the efforts of other agencies, namely the project sponsor(s) (lead agency) who will be responsible for complying with CEQA and NEPA, if applicable, for individual projects. MTC will use the Mitigation Monitoring Program to help to ensure that proposed mitigation measures are incorporated into project environmental review documents.
- E. The mitigation measures are appropriate for reducing the impacts identified at the program level. Specific mitigation measures that meet or exceed the requirements of these proposed measures will have to be implemented by project sponsors for impacts identified during the environmental evaluation of individual projects, particularly as they relate to details about project location. This future project-level environmental review will determine whether impacts can be mitigated to a less-than-significant level. In order for project-level environmental review to tier off the program EIR for the Plan, however, it must incorporate the mitigation measures set forth therein (CEQA Guidelines Section 15168, subd. (c)(3)). Thus, the use of this EIR by project sponsors in preparing environmental documents of specific projects will help ensure that project-specific mitigation measures will be implemented.
- F. The nature of the program-level evaluation of impacts is such that not enough is known about the specific project-level conditions to determine if the proposed mitigation meas-

ures will in fact be feasible and effective. Social, economic, legal, and technological conditions related to the ultimate design of individual projects will be factors in the feasibility of proposed mitigation measures at the project level. In particular, with cumulative visual impacts of transportation projects, a lot depends on the setting for various projects, and the land use needs, values, and previous experiences of the communities adjacent to the transportation corridors where projects are constructed.

## CULTURAL RESOURCES

## Impact

2.11-1 Transportation 2035 Plan projects that involve ground-disturbing activities and/or the introduction or alteration of visual elements have the potential to disturb, destroy, or significantly affect archaeological, paleontological, and/or geological resources and/or human remains. (Draft EIR, p. 2.11-11)

## **Mitigation Measures**

**2.11(a)** As project sponsors prepare the environmental review document for their individual project pursuant to CEQA/NEPA and prior to environmental certification, project sponsors shall consider adopting appropriate measures that would minimize or eliminate cumulatively considerable environmental impacts pursuant to CEQA/NEPA. MTC shall be provided with status reports of compliance with mitigation measures pursuant to MTC Resolution 1481, Revised. Mitigation measures to reduce impacts on archaeological, paleontological, and/or geological resources and/or human remains that shall be considered by project sponsors and decision-makers may include, but are not limited to, those described below.

- Face-to-face consultation with Native American tribes and individuals with cultural affiliations where the project is proposed to determine the potential for, or existence of, cultural resources, including cemeteries and sacred places, prior to project design and implementation stages.
- Preparation of a research design and testing plan in advance of implementation of the construction project, in order to efficiently facilitate the avoidance of cultural sites throughout the development process.
- Written assessment by a qualified tribal representative of sites or corridors with no identified cultural resources but which still have a moderate to high potential for containing tribal cultural resources.
- Upon "late discovery" of prehistoric archaeological resources during construction, project sponsors shall consult with the Native American tribe as well as with the "Most-Likely-Descendant" as designated by the Native American Heritage Commission pursuant to PRC 5097.
- Preservation in place; this is the preferred manner of mitigating impacts to archeological sites because it maintains the relationship between artifacts and the archeological context, and it may also avoid conflict with religious or cultural values of groups associated with the site. This may be achieved through incorporation within parks, green-space, or other open space by re-designing project using open space or undeveloped lands. This may also be achieved by following procedures for capping the site underneath a paved area. When avoiding and preserving in place are infeasible, a data recovery plan may be prepared according to CEQA Sec-

tion 15126.4. A data recovery plan consists of: the documentation and removal of the archeological deposit from a project site in a manner consistent with professional (and regulatory) standards; the subsequent inventorying, cataloguing, analysis, identification, dating, and interpretation of the artifacts; and the production of a report of findings.

## **Impact Conclusion**

This impact is potentially significant, but can be reduced to a level that is less than significant with implementation of the proposed mitigation measures.

## Findings

Changes or alterations have been required in, or incorporated into, the project that reduce the impact to a level that is less than significant (Finding (1)). The identified mitigation measures are within the responsibility and jurisdiction of other public agencies, and not MTC, and those agencies should adopt the measures (Finding (2)).

## Facts in Support of Findings

- A. The mitigation measures address site-specific factors that must be considered for each individual transportation project, rather than within the overall Transportation 2035 Plan. Therefore, implementation of the identified mitigation measures relies on the efforts of other agencies, namely the project sponsor(s) (lead agency) who will be responsible for complying with CEQA and NEPA, if applicable, for individual projects. MTC will use the Mitigation Monitoring Program to help to ensure that proposed mitigation measures are incorporated into project environmental review documents.
- B. The mitigation measures are appropriate for reducing the impacts identified at the program level. Specific mitigation measures that meet or exceed the requirements of these proposed measures will have to be implemented by project sponsors for impacts identified during the environmental evaluation of individual projects, particularly as they relate to details about project location. In order for project-level environmental review to tier off the program EIR for the Plan, however, it must incorporate the mitigation measures set forth therein (CEQA Guidelines Section 15168, subd. (c)(3)). Thus, the use of this EIR by project sponsors in preparing environmental documents of specific projects will help ensure that project-specific mitigation measures will be implemented. With implementation of these measures, the impact will be reduced to a level that is less than significant.

## Impact

# 2.11-2 Transportation 2035 Plan projects have the potential to disturb or destroy historical resources. (Draft EIR, p. 2.11-13)

## **Mitigation Measures**

2.11(b) As project sponsors prepare the environmental review document for their individual project pursuant to CEQA/NEPA and prior to environmental certification, project sponsors shall consider adopting appropriate measures that would minimize or eliminate cumulatively considerable environmental impacts pursuant to CEQA/NEPA. MTC shall be provided with status reports of compliance with mitigation measures pursuant to MTC Resolution 1481, Revised. Mi-

tigation measures to reduce impacts on historical that shall be considered by project sponsors and decision-makers may include, but are not limited to, those described below.

- Assessment by a qualified professional of structures greater than 40 years in age within the area of potential effect to determine their eligibility for recognition under State, federal, or local historic preservation criteria.
- The treatment of identified historic resources in accordance with either the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings or Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings.

#### **Impact Conclusion**

This impact is potentially significant, but can be reduced to a level that is less than significant with implementation of the proposed mitigation measures.

#### Findings

Changes or alterations have been required in, or incorporated into, the project that reduce the impact to a level that is less than significant (Finding (1)). The identified mitigation measures are within the responsibility and jurisdiction of other public agencies, and not MTC, and those agencies can and should adopt the measures (Finding (2)).

#### Facts in Support of Findings

- A. The mitigation measures address site-specific factors that must be considered for each individual transportation project, rather than within the overall Transportation 2035 Plan. Therefore, implementation of the identified mitigation measures relies on the efforts of other agencies, namely the project sponsor(s) (lead agency) who will be responsible for complying with CEQA and NEPA, if applicable, for individual projects. MTC will use the Mitigation Monitoring Program to help to ensure that proposed mitigation measures are incorporated into project environmental review documents.
- B. The mitigation measures are appropriate for reducing the impacts identified at the program level. Specific mitigation measures that meet or exceed the requirements of these proposed measures will have to be implemented by project sponsors for impacts identified during the environmental evaluation of individual projects, particularly as they relate to details about project location. In order for project-level environmental review to tier off the program EIR for the Plan, however, it must incorporate the mitigation measures set forth therein (CEQA Guidelines Section 15168, subd. (c)(3)). Thus, the use of this EIR by project sponsors in preparing environmental documents of specific projects will help ensure that project-specific mitigation measures will be implemented. With implementation of these measures, the impact will be reduced to a level that is less than significant.

#### **Cumulative Impact**

2.11-3 Transportation 2035 Plan projects, combined with projected future population growth and development, may result in a cumulative disturbance of cultural resources. (Draft EIR p. 2.11-14)

## **Mitigation Measures**

Mitigation measures 2.11(a) and 2.11(b), above.

### **Impact Conclusion**

The overall cumulative impact will remain significant and unavoidable after the incorporation of feasible mitigation. The project's contribution, however, is not cumulatively considerable after the incorporation of feasible mitigation.

## Findings

Changes or alterations have been required in, or incorporated into, the project that reduce the project's contribution to less than cumulatively considerable (Finding (1)). The identified mitigation measures are within the responsibility and jurisdiction of other public agencies, and not MTC, and those agencies can and should adopt the measures (Finding (2)).

## Facts in Support of Findings

- A. Cumulative population growth and development, regardless of the proposed Project, will occur in the region and will result in a substantial contribution to the identified cumulative impact.
- B. Proposed mitigation measures, along with conformity with existing federal, State, and local regulations, are expected to reduce the overall cumulative effect, as well as the Plan's contribution to the overall cumulative effect.
- C. The mitigation measures address site-specific factors that must be considered for each individual transportation project, rather than within the overall Transportation 2035 Plan. Therefore, implementation of the identified mitigation measures relies on the efforts of other agencies, namely the project sponsor(s) (lead agency) who will be responsible for complying with CEQA and NEPA, if applicable, for individual projects. MTC will use the Mitigation Monitoring Program to help to ensure that proposed mitigation measures are incorporated into project environmental review documents.
- D. The mitigation measures are appropriate for reducing the impacts identified at the program level. Specific mitigation measures that meet or exceed the requirements of these proposed measures will have to be implemented by project sponsors for impacts identified during the environmental evaluation of individual projects, particularly as they relate to details about project location. In order for project-level environmental review to tier off the program EIR for the Plan, however, it must incorporate the mitigation measures set forth therein (CEQA Guidelines Section 15168, subd. (c)(3)). Thus, the use of this EIR by project sponsors in preparing environmental documents of specific projects will help ensure that project-specific mitigation measures will be implemented. Implementation of the proposed Transportation 2035 Plan, and mitigation measures, will not result in a considerable contribution to this cumulative impact.

### **FINDINGS REGARDING ALTERNATIVES**

#### INTRODUCTION

CEQA requires an EIR to consider a reasonable range of alternatives to a proposed project or to the location of the proposed project which would "feasibly attain most the basic objectives of the project" (CEQA Guidelines, Section 15126.6(a)). Section 15126.6, subdivision (f) of the CEQA Guidelines limits the alternatives that must be considered in the EIR to those "that would avoid or substantially lessen any of the significant effects of the project."

Where a lead agency has determined that, even after the adoption of all feasible mitigation measures, a Project as proposed will still cause one or more significant adverse environmental effects that cannot be substantially lessened or avoided, the agency, prior to approving the Project as mitigated, must first determine whether, with respect to such impacts, there remain any Project alternatives that are both environmentally superior and feasible within the meaning of CEQA.

Based on the analysis in the EIR, the project as proposed is expected to result in significant and unavoidable impacts. The alternatives to the project were designed to avoid or reduce these significant and unavoidable impacts and to further reduce impacts that are found to be less than significant following mitigation. MTC has reviewed the significant impacts associated with a reasonable range of alternatives as compared with the project as originally proposed, and in evaluating the alternatives has also considered each alternative's feasibility, taking into account economic, environmental, social, legal, and other factors.

This Section describes the project objectives and attributes of the alternatives and provides the Commission's reasons for rejecting the alternatives. (See also Appendix B of this document: Statement of Overriding Considerations in Appendix B.)

## **GOALS AND OBJECTIVES OF THE PROJECT**

MTC hereby finds that the following goals and objectives were established by MTC for the Transportation 2035 Plan:

**Approved Performance Objectives** 

	Goal	Performance Objectives
Economy	Maintenance & Safety	Maintenance
		<ul> <li>Maintain local road pavement condition index (PCI) of 75 or greater for local streets and roads</li> </ul>
		<ul> <li>State highway distressed pavement condition lane-miles not to exceed 10% of total system</li> </ul>
		<ul> <li>Achieve an average age for all transit asset types that is no more than 50% of their useful life</li> </ul>
		<ul> <li>Increase the average number of miles between service calls for transit service in the region to 8,000 miles</li> <li>Collisions/Fatalities</li> </ul>
		<ul> <li>Reduce fatalities from motor-vehicle collisions by 15 percent from today by 2035</li> </ul>
		<ul> <li>Reduce lagandes in our model vermele consistents by 15 percent non-cody of 2005</li> <li>Reduce bicycle and pedestrian fatalities attributed to motor vehicle collisions by 25 percent each from 2000 by 2035</li> </ul>
		<ul> <li>Reduce bicycle and pedestrian injuries attributed to motor vehicle collisions by 25 percent each from 2000 by 2035</li> </ul>
	Reliability; Effi- cient Freight Travel; Security & Emergency Management	• Reduce per-capita delay by 20 percent from today by 2035
Environment	Clean Air; Cli- mate Protec-	<ul> <li>Reduce daily per-capita vehicle miles traveled (VMT) by 10 percent from today by 2035</li> </ul>
	tion	<ul> <li>Reduce emissions of finer particulates (PM<sub>2.5</sub>) by 10 percent from today by 2035</li> </ul>
		• Reduce emissions of coarse particulates (PM10) by 45 percent from today by 2035
		• Reduce carbon dioxide (CO <sub>2</sub> ) emissions to 40 percent below 1990 levels by 2035
Equity	Equitable Access; Livable Com- munities	<ul> <li>Decrease by 10 percent the combined share of low-income and lower-middle in come residents' household income consumed by transportation and housing</li> </ul>

The components of the Transportation 2035 Plan are designed to fully achieve the project objectives. The Plan is divided into the financially constrained element and the financiallyunconstrained element. With this comprehensive set of projects, the Plan meets the project objectives better than any of the other alternatives.

## **ALTERNATIVES SUMMARIZED**

The Transportation 2035 Plan EIR considers four alternatives to the proposed Transportation 2035 Plan in addition to the CEQA-required analysis of a No Project alternative. A full descrip-

tion of the alternatives and alternative selection process is in Chapter 3.1 of the DEIR. The alternatives are as follows:

## Alternative I: No Project

The No Project alternative addresses the effect of not implementing the Transportation 2035 Plan. This alternative includes a set of transportation projects and programs that are in advanced planning stages and slated to go forward since they have full funding commitments. (Therefore, the No Project alternative is not equivalent to existing conditions.) These projects are: (1) identified in the federally required Fiscal Year 2009 Transportation Improvement Program, a four-year funding program of Bay Area projects and programs, (2) not yet in the TIP but are fully funded sales tax projects authorized by voters in seven Bay Area counties, including San Francisco, Santa Clara, San Mateo, Alameda, Contra Costa, Sonoma and Marin, or (3) not yet in the TIP but fully funded through other committed funds as defined by statute or Commission policy. This alternative does not include transportation projects and programs funded by the \$32 billion in uncommitted discretionary funds.

## **Alternative 2: Heavy Maintenance/Climate Protection Emphasis**

This alternative is financially constrained to the \$220 billion projected revenue available to the region over the next 25-years. Unlike the proposed Project, this Heavy Maintenance/Climate Protection alternative places its investment emphasis almost entirely on system maintenance and efficiency projects that support the plan goals.

This alternative maximizes the use of available discretionary funds for investments that (1) reduce shortfalls for transit and local roadway maintenance; (2) improve walkability, bicycling, transit access, and carpooling and ridesharing; (3) help local jurisdictions to plan and build housing near transit; and (4) implement public education and outreach programs to raise awareness and facilitate behavior changes that help the region to meet its climate protection goal. The set of projects and programs in this alternative is designed to reduce vehicle miles traveled and/or greenhouse gas emissions.

This alternative retains the plan expenditures for the \$194 billion in committed funds because these funds are committed to specific uses by statute or Commission policy, but redirects uncommitted discretionary revenues. Because this alternative focuses on system maintenance and efficiency, it excludes all expansion, including the Regional HOT Network and the transit and roadway expansion projects that in the proposed Project are funded in part by the \$32 billion discretionary funds. As a result of the exclusion of the Regional HOT Network, the \$6.1 billion in net revenue that the Regional HOT Network would generate is not available to fund corridor improvements (such as transit operating and capital needs, freeway operations, interchanges, roadway maintenance and local access improvements). This leaves \$26 billion in uncommitted discretionary funds that are redirected to other maintenance and climate protection priorities.

#### Alternative 3: Heavy Maintenance/Climate Protection Emphasis + Pricing

This alternative reflects the same project definition as Alternative 2 (Heavy Maintenance/Climate Protection Emphasis) plus it includes applying user-based pricing strategies in order to determine how pricing might influence the performance of infrastructure investments. The pricing strategies are intended to induce changes in travel behavior by increasing the cost of driving. They in-

clude: (a) carbon tax or tax on vehicle miles driven, (b) congestion fee for using congested freeways during peak periods, and (c) increased parking charges.

To represent the carbon tax or VMT tax, gas prices are assumed to increase by 21 percent from \$7.47 per gallon to \$9.07 in 2035 (all in 2008 current dollars). Overall, the total auto operating cost per mile would also increase by 21 percent, from 39 cents per mile to 47 cents per mile. For the congestion fee, a charge of 25-cents per mile on congested freeways is added to freeway segments where the volume-to-capacity ratio exceeds 0.90 (very congested facilities). For the parking charge, parking costs are increased by \$1.00 per hour to both peak and off-peak trips. This impacts both work and non-work trips, and has a higher impact on short trips than long trips. So, these increased parking costs will end up showing more non-motorized (bicycling and walking) trips in the pricing tests. The aggregate effect of these pricing strategies is a substantial increase in auto operating cost. This alternative aims to encourage more people to bike, walk and take transit, drive less, and produce less transportation-related greenhouse gas emissions by making it very expensive to drive.

MTC tested these pricing strategies as part of the vision scenario analysis in fall 2007 in response to expressed interest by the State legislators to pursue a carbon tax, VMT tax or congestion pricing and public interest to increase parking charges. These pricing strategies were tested under this alternative for CEQA evaluation purposes. At this time, MTC has no legislative authority to implement the pricing strategies described in this alternative.

#### Alternative 4: Heavy Maintenance/Climate Protection Emphasis + Land Use

This alternative reflects the same project definition as Alternative 2 (Heavy Maintenance/Climate Protection Emphasis) plus it includes an alternative land use forecast in order to determine how a different kind of regional growth might influence the performance of infrastructure investments. This alternative land use forecast is a policy forecast, as opposed to a purely market-driven outcome. ABAG staff produced this alternative land use forecast with the objective of balancing jobs and housing and targeting growth in existing communities and near transit. Compared to Projections 2007, this forecast reflects considerable shifts in regional growth away from the fringes and toward existing employment and housing centers, areas projected to have either household or employment growth, and areas with existing and/or planned transit. It also assumes fewer incommuters from neighboring regions by accommodating 37,000 more households within the Bay Area. This alternative assumes no pricing strategy.

This alternative is expected to maximize transit use and reduce auto trips and vehicle miles traveled because the land use strategy places projected population growth near existing and planned transit services and employment centers. However, much of the land surrounding existing and planned transit stations may not be currently zoned for higher density residential and commercial uses. To encourage transit-oriented development, local land use policy will need to be modified to allow for higher densities than currently allowed and to revise parking regulations to support transit-oriented development.

This alternative assumes that the regional planning agencies of ABAG, the Bay Area Air Quality Management District (BAAQMD), the Bay Conservation and Development Commission (BCDC) and MTC will collaborate to promote and achieve more focused urban growth than estimated in *Projections 2007*, in part through existing and planned programs and improvements contemplated by this alternative. Specific policy approaches have not been selected, however,

some possible examples of regional policy approaches and implementation mechanisms to achieve the alternative land use forecast include increasing public awareness of the impacts of travel and location decisions, continuing to coordinate with local governments on land use decisions and parking policies and standards that impact transportation investments and vice versa, providing financial incentives to support Priority Development Areas (PDAs), and expanding the MTC Transit-Oriented Development Policy to include minimum employment densities and regional transit centers. The regional agencies must also work with local jurisdictions to modify the land use elements of their general plans, which is a key driver to implementing this land use strategy.

## **ENVIRONMENTAL IMPACTS OF ALTERNATIVES**

MTC examined a reasonable range of alternatives to the Transportation 2035 Plan. This analysis is fully documented in the Draft EIR on the Transportation 2035 Plan. Based on this examination, MTC has determined that (1) there are tradeoffs in impacts associated with the various alternatives, (2) alternatives can have better environmental outcomes than the proposed Project relative to significance criteria and yet still have significant and unavoidable effects under those same criteria, (3) the alternatives may result in varying degrees of achieving the Transportation 2035 Plan goals, and (4) there are significant feasibility issues related to implementation of the Heavy Maintenance/Climate Protection Emphasis + Pricing Strategies alternative (the environmentally superior alternative).

### **Environmentally Superior Alternative**

According to the analysis in the Draft EIR, the Heavy Maintenance/Climate Protection Emphasis + Pricing alternative and the Heavy Maintenance/Climate Protection + Land Use alternative perform better than the proposed Project overall, while the No Project and the Heavy Maintenance/Climate Protection Emphasis alternative perform comparably or slightly worse than the proposed Project (See Draft EIR, p. 3.1-38; see also *id.* at Table 3.1-16).

The Draft EIR concluded that both the No Project and Heavy Maintenance/Climate Protection Emphasis alternatives may result in more congestion than the proposed Project in those areas where necessary new capacity (auto or transit) is not provided. These two alternatives would also result in fewer jobs accessible by auto and transit. This effect would in turn result in these alternatives performing deficiently (in comparison to the proposed Project and the other alternatives) with respect to reducing vehicle miles traveled (VMT). The 1 percent increase in vehicle use under these alternatives would also result in greater air quality impacts. The No Project and Heavy Maintenance/Climate Protection Emphasis alternatives would also result in greater consumption of transportation energy and would not result in any improvement over the proposed Project with respect to climate change impacts. Finally, these two alternatives would produce greater Geology and Seismicity impacts, to the extent that seismic upgrades would not be carried out. The No Project and Heavy Maintenance/Climate Protection Emphasis alternatives would not be carried out. The No Project and Heavy Maintenance/Climate Protection Emphasis alternatives would also result in greatest noise impacts.

In some impact categories, such as Land Use, Visual Resources and Cultural Resources, the No Project alternative performed better than the proposed Project and all three Heavy Mainten-ance/Climate Protection Emphasis alternatives.

Though both the Heavy Maintenance/Climate Protection Emphasis alternative + Land Use alternative and Heavy Maintenance/Climate Protection + Pricing alternative perform very well, this CEQA analysis concludes that the Heavy Maintenance/Climate Protection Emphasis + Pricing alternative is the environmentally superior alternative, primarily because:

- It demonstrated less impact in several categories than the proposed Project and the other alternatives, including Energy and Climate Change;
- It has more potential flexibility to apply and adjust pricing controls to current needs;
- It can in theory be applied "immediately" and begin realizing environmental benefits sooner than land use change; and
- It has a stronger potential market influence on new "green" technologies than land use changes.

## Impacts Relative to the Project's Significant Impacts

While the Heavy Maintenance/Climate Protection Emphasis + Pricing Strategies Alternative was found to be environmentally superior to the proposed Project and the other alternatives evaluated, it and all of the other alternatives also have potentially significant impacts in one or more issue areas that cannot be mitigated. In particular, if held to the same level of scrutiny to which the proposed Project was held, all four alternatives are likely to result in eight of the nine same significant and unavoidable impacts found when evaluating the proposed Project. This is because a significant and unavoidable impact may still occur even if one alternative is incrementally better than another. A summary of the alternatives' environmental performance relative to the proposed Project's significant and unavoidable impacts is provided below:

- Vehicle Miles Traveled at Level of Service F. When comparing vehicle miles traveled at Level of Service F for all facility types, all four alternatives perform substantively worse than the proposed Project (anywhere from 14 to 69 percent more vehicle miles traveled at LOS F in 2035). These results suggest that all four alternatives would also have a significant and unavoidable impact on vehicle miles traveled at LOS F;
- Construction-related Emissions of Criteria Pollutants. When comparing constructionrelated emissions of criteria pollutants, it is estimated that each of the alternatives would result in fewer construction-related emissions because there are fewer projects to construct; however, there are no region-level estimates for construction-related emissions and the significant and unavoidable conclusion for the proposed Project is based less on the efficacy of mitigation measures than on the uncertainty of the specific local context at the time that projects go into construction. This same uncertainty would apply to all of the alternatives, suggesting that they too, could have significant unavoidable impacts related to construction emissions under certain local circumstances;
- **PM10 and PM2.5 Emissions.** When comparing PM10 and PM2.5 emissions, the Heavy Maintenance/Climate Protection Emphasis + Land Use Strategies Alternative and the Heavy Maintenance/Climate Protection Emphasis + Pricing Strategies Alternative result in slightly (less than 3 percent) less particulate matter emissions than the proposed Project while the No Project alternative and the Heavy Maintenance/Climate Protection Emphasis alternative result in slightly more particulate matter emissions than the proposed Project. However, all alternatives result in substantially more particulate matter emissions than under existing conditions. These results suggest that all four alternatives would also have a significant and unavoidable impact on particulate matter emissions;

- Conversion of Prime and Important Farmland to Transportation Use. When comparing the individually and cumulatively considerable conversion of farmland, including prime agricultural land designated by the State of California, to transportation use, each of the alternatives is estimated to convert substantially less Prime and Important farmland to transportation use relative to the proposed Project. However, as described in the Draft EIR, the methodology is conservative and designed to overestimate the potential for impact. Furthermore, of the Bay Area's 2.3 million acres of agricultural lands, the potential impact of the proposed Project (about 1,400 acres) represents 6 one-hundredths of a percent of all agricultural lands in the Bay Area, while the potential impact of each alternative (between 260 and 300 acres) represents one one-hundredth of a percent of all agricultural lands in the Bay Area. The finding of a significant unavoidable impact is less a factor of scale of change than an acknowled-gement that agricultural lands in the Bay Area are under intense development pressure. In that respect, all four alternatives could be expected to have a cumulatively considerable contribution to this significant cumulative impact;
- Short-term Community Disruption. When comparing disruption of existing land uses, neighborhoods, and communities in the short-term, each of the alternatives involves substantially less new construction activity than the proposed Project, and thus would be expected to result in less displacement of land use activities and disruption of travel corridors, mobility, and quality of life conditions (e.g. noise and air quality) for nearby communities. However, as described in the Draft EIR, the methodology is conservative and designed to overestimate the potential for impact. Furthermore, the significant unavoidable conclusion for the proposed Project is based not on the efficacy of mitigation measures themselves, but on the uncertainty of the specific local context at the time that projects go into construction. This same uncertainty would apply to all of the alternatives, suggesting that they too, could cause significant short-term community disruption under certain circumstances;
- Noise Levels along Some Travel Corridors. When comparing cumulatively considerable increase in noise levels along some travel corridors, all alternatives result in more noise impact than the proposed Project. These results suggest that all four alternatives also have a cumulatively considerable contribution to this significant cumulative impact;
- Adverse Effects on Special-Status Species. When comparing adverse effects on special-status • plant and/or wildlife species identified as endangered, candidate, and/or special status by the CDFG or USFWS, each of the alternatives would likely result in less potential direct, construction-related impacts on special status species due to the fact that more new construction would occur at more locations under the proposed Project than under the other alternatives. However, as described in the Draft EIR, the methodology is conservative and designed to overestimate the potential for impact. In many cases, the project alignments, locations, or other design details are not known because the projects are in the early stages of planning or development. As a result, this impact analysis relies largely on the potential for biological impacts based on proximity to sensitive resources, an analysis method that inherently tends to inflate the potential for adverse effects. Due to the programmatic level of analysis in the EIR and lack of project-specific plans, it is not possible to define the exact extent of potential impact, so it is not possible to ascertain with certainty whether the identified mitigation measures for these impacts will reduce impacts to levels considered "not significant." Due to this uncertainty, this impact is considered potentially significant and unavoidable for all alternatives:
- Conversion of Undeveloped Land Contributing to the Removal or Fragmentation of Habitat Area. When comparing cumulatively considerable conversion of undeveloped land to

urban uses, contributing to the removal or fragmentation of habitat area, each of the alternatives would likely result in less potential contribution to construction-related impacts on wetlands, special status species, and designated or proposed critical habitat due to the fact that more new construction would occur at more locations under the proposed Project than under the other alternatives. While the Heavy Maintenance/Climate Protection Emphasis + Land Use Strategies alternative is expected to be the most effective at preventing fragmentation of habitat area, due to the programmatic level of analysis in the EIR and lack of projectspecific plans, it is not possible to define the exact extent of potential impact, so it is not possible to ascertain with certainty whether the identified mitigation measures for these impacts will reduce impacts to levels considered "not significant." Due to this uncertainty, the contribution of the alternatives to the significant cumulative impact is considered cumulatively considerable;

• **Degradation of Visual Resources.** When comparing individual and cumulative degradation of visual resources by adding or expanding development in rural or open space areas, blocking views from adjoining areas, blocking or intruding into important vistas, and changing the scale, character, and quality of designated or eligible Scenic Highways, each of the alternatives involves substantially less new construction activity than the proposed Project, and thus would be expected to result in fewer visual resource impacts than the proposed Project. In this issue area it is possible that the contribution of the alternatives to the significant cumulative impact may not be cumulatively considerable, primarily due to the exclusion of new commitments construction from the networks of the alternatives.

MTC's conclusion from this detailed comparison is that, while selecting the environmentally superior alternative may provide some better environmental results than the proposed Project, a complete EIR analysis of the alternative would likely reveal many if not most of the same significant and unavoidable impacts, primarily due to the role of cumulative regional population growth and development which applies to every alternative considered, and secondarily due to the uncertainty built into a regional-scale programmatic analysis of environmental effects. All of the alternatives studied would result in some significant and unavoidable impacts.

## **Meeting Project Objectives**

An alternative may be "infeasible" if it fails to sufficiently promote the lead agency's underlying goals and objectives with respect to the Project. In terms of objectives, the Heavy Maintenance/Climate Protection Emphasis + Pricing alternative and the Heavy Maintenance/Climate Protection + Land Use are both likely to meet most of the basic project objectives of the proposed Project:

- Maintenance & Safety (both of these alternatives provide more spending on maintenance, operations, and shortfalls than the proposed Project);
- **Reliability & Equitable Access** (In the Transportation issue area, both of these alternatives demonstrated more accessibility to jobs by car and transit than the proposed Project);
- Livable Communities (both of these alternatives provide more funding than the proposed Project for the Transportation for Livable Communities Program, the Regional Bicycle Network, Transportation Climate Action Campaign, and the Lifeline Transportation Program);
- Clean Air (both Land Use and Pricing alternative variations perform better than the proposed Project in the Air Quality analysis); and

• Climate Protection (Pricing performed best and Land Use performed second-best in the Greenhouse Gas Emissions comparison).

It is less clear how well the Heavy Maintenance/Climate Protection Emphasis + Pricing alternative and Heavy Maintenance/Climate Protection + Land Use alternative would achieve the two remaining performance objectives, Efficient Freight Travel and Security & Emergency Management, particularly without the full program of improvements in the proposed Project. Nonetheless, given that both the Pricing and the Land Use alternatives perform better than the proposed Project in the transportation analysis, it is reasonable to assume that they could result in equal or more efficient freight travel and perhaps better transportation security and emergency management.

## FINDINGS OF ALTERNATIVES ANALYSIS

Public Resources Code Section 21081, subdivision (a)(3) provides that when approving a project for which an EIR has been prepared, a public agency may find that "specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the environmental impact report."

Alternatives analyzed in the EIR need not be actually feasible, but rather need only be "potentially feasible." (CEQA Guidelines 15126.6(a)); see also *Mira Mar Mobile Community v. City of Oceanside* (2004) 119 Cal.App.4th 477, 489 (although the respondent city ultimately rejected as infeasible several alternatives that were evaluated in an EIR, "this conclusion does not imply these alternatives were improperly included for discussion"; "alternatives included in an EIR need only be potentially feasible").

MTC herby makes findings (2) and (3) in regard to the No Project alternative, Heavy Maintenance/Climate Protection Emphasis alternative, Heavy Maintenance/Climate Protection Emphasis + Pricing alternative, and Heavy Maintenance/Climate Protection + Land Use alternative. The following facts are provided in support of these findings:

- A. The No Project alternative does not include any projects that would be funded through the \$32 billion in uncommitted discretionary funds. Thus, this alternative would not provide additional transportation infrastructure beyond that which is already committed. As such, this alternative would not accommodate, as well as the proposed Project, the projected growth in the Bay Area's population and employment and the concomitant increased demand for transportation infrastructure (see DEIR, Ch. 2: Transportation). Federal and state laws require MTC to develop regional transportation plans that account for future population growth and increased infrastructure demands. Moreover, Bay Area residents and businesses rely on a functional and effective transportation infrastructure would impede economic growth and vitality. The No Project alternative is therefore legally, socially, and economically infeasible.
- B. The Heavy Maintenance/Climate Protection Emphasis alternative emphasizes maintenance of existing roadways and transit systems and does not direct any of the \$32 billion in uncommitted discretionary funds to roadway expansion projects. As such, this alternative would also not accommodate, as well as the proposed Project, the projected growth in the Bay Area's population and employment and the concomitant increased demand for

transportation infrastructure. Federal and state laws require MTC to develop regional transportation plans that account for future population growth and increased infrastructure demands. Moreover, Bay Area residents and businesses rely on a functional and effective transportation system. The increased gridlock and costly delay associated with inadequate transportation infrastructure would impede economic growth and vitality. The Heavy Maintenance/Climate Protection Emphasis alternative is therefore legally, socially, and economically infeasible.

- C. The Heavy Maintenance/Climate Protection Emphasis + Land Use alternative would perform better than both the No Project and Heavy Maintenance/Climate Protection Emphasis alternatives and would therefore more fully satisfy legal requirements, social demands, and economic needs for adequate transportation infrastructure. However, the heightened performance of this alternative is predicated on hypothetical land use assumptions that cannot be realized without substantial governmental intervention, through regulation or new incentives to create public funding for housing and infrastructure improvements and increased levels of public services and facilities which would be needed by the proposed intensification of residential development in the urban core.
- D. While local governments currently have authority over local land use decisions, the regional agencies (MTC, ABAG, BCDC, and BAAQMD) have made significant progress towards integrating transportation and land use through regional initiatives such as the Transportation for Livable Communities Program that supports community revitalization and compact development, MTC's Transit-Oriented Development Policy that conditions Resolution 3434 Regional Transit Expansion Program discretionary funding on supportive land uses, and ABAG's demographic projections series (latest being Projections 2007) that lays out a realistic assessment of regional growth but recognizes emerging trends in markets, demographics, and local policies that promote more compact infill development and transit-oriented development. However, more aggressive land use strategies such as those tested in this alternative would be infeasible absent new regulations and authority. Furthermore, while some local governments are already taking steps to plan for transit-oriented development and other infill opportunities, unresolved conflicts with local General Plans, "community character" concerns, and local economic development objectives would tend to substantially hinder realization of these land use assumptions. It is therefore currently legally infeasible for MTC to impose the land use changes discussed in this alternative. Furthermore, without reasonable assurance the program would perform as modeled absent statutory authority for implementation, this alternative is also socially and economically infeasible for the purposes of this regional transportation plan update.
- E. The Heavy Maintenance/Climate Protection Emphasis + Pricing alternative would also perform better than both the No Project and Heavy Maintenance/Climate Protection Emphasis alternatives and would therefore more fully satisfy legal requirements, social demands, and economic needs for adequate transportation infrastructure. However, the heightened performance of this alternative also presumes that regional agencies have certain authority to impose new pricing strategies, most of which are subject to legislative or voter approval. For those strategies that require legislative or voter approval, any economic downturn reduces public support for "taxing" schemes that intentionally raise the price of driving, particularly in the short term before households can locate closer to urban centers and transit.
- F. Though the Regional HOT Network will require new legislative authority to implement in the Bay Area, the magnitude of the legislative changes required for the aggressive pric-

ing strategies proposed under this alternative are greater and possibly more contentious than changes required for the HOT Network. Indeed, some pricing strategies such as parking cash-out are expressly limited in application by state law. While MTC actively advocates in Sacramento and Washington, DC, for expansion of statutory authority to implement pricing strategies such as the HOT Lane Network, the difference between MTC's existing authority and that required to implement the modeled pricing strategies is so large it is unreasonable to assume that the alternative could be implemented effectively. For example, for MTC to impose the carbon tax or VMT tax described in the Draft EIR, one of the following would be required: 1) the legislature would need to enact the tax either by a majority or a two-thirds (2/3) vote (depending on whether the tax is a special or general tax), 2) MTC would have to adopt the tax and this decision would have to be ratified by the voters through a two-thirds (2/3) majority vote (Cal. Const., art. XIII(a), Section 4), or 3) the voters would need to approve the tax by voting in favor of a proposition (the equivalent of Proposition 42 passed in 2002 or Proposition 1B passed in 2006). As to the other pricing strategies contemplated in this alternative, MTC does not have the authority of ability to directly impose a congestion fee for use of congested freeways, and only local governments can impose increases to parking prices. It is therefore currently legally infeasible for MTC to impose the pricing strategies discussed in this alternative. Without reasonable assurance the program would perform as modeled, it is infeasible to adopt this alternative for the purposes of this regional transportation plan update.

G. Feasibility under CEQA may also encompass desirability to the extent that desirability is based on a reasonable balancing of the relevant economic, environmental, social, and technological factors. (City of Del Mar v City of San Diego (1982) 133 Cal.App.3d 410, 417.) The Heavy Maintenance/Climate Protection Emphasis alternative, Heavy Maintenance/Climate Protection Emphasis + Land Use alternative, and the Heavy Maintenance/Climate Protection Emphasis + Pricing alternative all exclude some new projects and programs such that they could be in conflict with countywide transportation plans as proposed by the CMAs. The State's regional transportation plan guidelines state that the RTP should "identify and incorporate other State and local transportation plans and programs." MTC's regional planning process is designed to incorporate the public participation and outreach processes that were undertaken at the local level to develop the transportation improvement packages proposed by CMAs for inclusion in the Transportation 2035 Plan. This is because transportation plans and projects evolve over time, often through complex multi-agency consultation, public outreach and review processes. The regional planning process does not require agencies, at every instance, to return to "square one" to continually reconsider the appropriate form and impact of their longrange planning efforts. Though the regional transportation plan must be updated every four years, transportation improvements take many years to plan, review, design, fund, and implement. Comment letters in Section 3 of the Final EIR from the Alameda County Congestion Management Agency, Santa Clara Valley Transportation Authority, and City/County Association of Governments of San Mateo County, respectively, underscore that their programs are not a collection of miscellaneous investments, but rather a program of projects that are interrelated and have been vetted within each community. For this additional reason, these alternatives would be undesirable, and legally and socially infeasible.

## **RECORD OF PROCEEDINGS**

In accordance with Public Resources Code Section 21167.6, subdivision (e), the record of proceedings for the MTC's findings, alternatives analysis, and ultimate decision on the Plan includes the documents identified below.

- The NOP for the preparation of the Draft EIR;
- Public notices issued by MTC in conjunction with the Plan;
- All comments submitted by agencies or members of the public during the comment period on the NOP;
- MTC's Draft Environmental Impact Report for the Transportation 2035 Plan, December 2008 (includes all appendices);
- The Association of Bay Area Government's *Projections 2007* (ABAG's biennial forecast of population, housing, jobs, and income for the nine-county San Francisco Bay Region);
- MTC's Transportation 2035 Plan Performance Assessment Report, December 2008;
- MTC's Bay Area High Occupancy Toll (HOT) Network Study, December 2008 Update, and background feasibility studies and assessments;
- MTC's Travel Forecasts Data Summary, December 2008;
- MTC's Transportation Air Quality Conformity Analysis for the Transportation 2035 Plan and 2009 Transportation Improvement Program/Amendment #09-06, April 2009;
- MTC's Final Environmental Impact Report for the Transportation 2035 Plan, April 2009 (includes all appendices such as these Findings, the Statement of Overriding Considerations, and Mitigation Monitoring Program);
- Land Use and Planning Consistency Information;
- Noise Data;
- Any minutes and/or verbatim transcripts of all information sessions, public meetings, and public hearings held by MTC in connection with the Plan;
- Any documentary or other evidence submitted to the MTC at such information sessions, public meetings, and public hearings;
- Any and all resolutions adopted by MTC regarding the Plan, and all staff reports, analyses, and summaries related to the adoption of those resolutions;
- Matters of common knowledge to MTC, including, but not limited to federal, state, and local laws and regulations;
- Any documents expressly cited in these findings, in addition to those cited above; and
- Any other materials required for the record of proceedings by Public Resources Code Section 21167.6, subdivision (e).

The documents constituting the record of proceedings are available for review by responsible agencies and interested members of the public by appointment during normal business hours at the offices of the Metropolitan Transportation Commission, 101 Eighth Street, Oakland, CA 94607. The custodian of these documents is MTC's Public Information Officer.

### **INDEPENDENT REVIEW AND ANALYSIS**

Under CEQA Public Resources Code Section 21082.1, subdivision (c), the lead agency must: (1) independently review and analyze the EIR; (2) circulate draft documents that reflect its independent judgment; and (3) as part of the certification of an EIR, find that the report or declaration reflects the independent judgment of the lead agency.

The Commission hereby finds that it has independently reviewed and analyzed the EIR, and all other materials in the Record of Proceedings; circulated a Draft EIR and a Final EIR that reflect its independent judgment; and finds that the Draft and Final EIR reflect MTC's independent judgment.

Transportation 2035 Plan Final Environmental Impact Report

This page intentionally left blank.

## Appendix B: Statement of Overriding Considerations

## Appendix B: Statement of Overriding Considerations

CEQA requires the Metropolitan Transportation Commission (MTC or Commission) to balance the benefits of the Transportation 2035 Plan against its significant unavoidable environmental effects in determining whether to approve the project. Since the EIR identifies significant impacts of the Transportation 2035 Plan that cannot feasibly be mitigated to below a level of significance, MTC must state in writing its specific reasons for approving the project in a "statement of overriding considerations" pursuant to Sections 15043 and 15093 of the CEQA Guidelines. This Statement of Overriding Considerations sets forth the specific reasons supporting MTC's action in approving the Transportation 2035 Plan, based on this EIR and other information in the administrative record.

In making the statement of overriding considerations, "CEQA requires the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits of a proposed project against its unavoidable environmental risks when determining whether to approve the project. If the specific economic, legal, social, technological, or other benefits of a proposed project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered 'acceptable'." (CEQA Guidelines, Section 15093, subd. (a).)

In approving the proposed Transportation 2035 Plan, MTC makes the following Statement of Overriding Considerations pursuant to Public Resources Code Section 21081 and State CEQA Guidelines Section 15093 in support of its findings on the Final EIR:

The Commission has considered the information contained in the Final EIR and has fully reviewed and considered all of the public testimony, documentation, exhibits, reports, and presentations included in the record of these proceedings. The Commission specifically finds and determines that this Statement of Overriding Considerations is based upon and supported by substantial evidence in the record.

The Commission has carefully weighed the benefits of the proposed Transportation 2035 Plan against any adverse impacts identified in the Final EIR that could not be feasibly mitigated to a level of insignificance (listed in the following section). While the Commission has required all feasible mitigation measures, such impacts remain significant for purposes of adopting this Statement of Overriding Considerations.

This Statement of Overriding Considerations applies specifically to those impacts found to be significant and unavoidable as set forth in the Final EIR and the record of these proceedings. In addition, this Statement of Overriding Considerations applies to those impacts that have been substantially lessened but not necessarily lessened to a level of insignificance.

Based upon the goals and objectives identified in the proposed Plan and the Final EIR, following extensive public participation and testimony, and notwithstanding the impacts

that are identified in the Final EIR as being significant and potentially significant and which arguably may not be avoided, lessened, or mitigated to a level of insignificance, the Commission, acting pursuant to Public Resources Code Section 21081 and Section 15093 of the State CEQA Guidelines, hereby determines that specific economic, legal, social, environmental, technological, and other benefits and overriding considerations of the proposed Plan sufficiently outweigh any remaining unavoidable, adverse environmental impacts of the proposed Plan and that the proposed Plan should be approved.

The following sections briefly summarize the results of the environmental analysis on the proposed Project (described in more detail in the Draft EIR and Final EIR Appendix A: Findings and Facts in Support of Findings), and then describe the general project benefits considered by decision makers in determining to adopt the proposed Transportation 2035 Plan despite its potentially significant adverse environmental effects.

## SIGNFICANT AND UNAVOIDABLE ENVIRONMENTAL EFFECTS

This EIR examined the environmental impacts of the Transportation 2035 Plan in the areas of Transportation, Air Quality, Land Use and Housing, Energy, Greenhouse Gases and Climate Change, Noise, Geology and Seismicity, Biological Resources, Water Resources, Visual Resources, Cultural Resources, and Growth Inducement. Despite identifying mitigation for each potentially significant impact, significant unavoidable impacts were identified in the issue areas of Transportation, Air Quality, Land Use and Housing, Noise, Biological Resources, and Visual Resources. In determining the significance of the environmental effects, two considerations are important to emphasize here:

Conservative Approach to Analysis and Conclusions. In issue areas where uncertainty surrounds impacts at the program level, the EIR analysis used a conservative approach to both assessment and conclusions. For instance, in the land use analyses, conservative impact areas were assumed around the centerlines of projects, because the actual alignment of many projects is still unknown (Draft EIR, p. 2.3-27). Land use impacts were identified by acreage for all land uses that potentially overlap proposed construction/expansion/widening projects. The biological resources assessment was also conservative because it assumed that, unless known to be absent, special status species exist in all areas that provide at least moderate quality habitat (Draft EIR, page 2.9-27). Potential impacts were determined by evaluating whether proposed transportation improvements would occur within the potential range of a special status species of concern, whether projects would directly encroach upon an area of ecological significance, or whether the projects could involve the filling of wetlands. As stated on EIR page 2.9-22, "in many cases, the project alignments, locations, or other design details are not known because the projects are in the early stages of planning or development. As a result, this impact analysis relies largely on the potential for biological impacts based on proximity to sensitive resources, an analysis method that inherently tends to inflate the potential for adverse effects. Thus, while such impacts may be identified in this EIR, upon project implementation it is anticipated that actual impacts will be incrementally smaller. Laws and regulations protecting special-status species, areas of ecological significance, and wetland resources are effective incentives for project proponents to design alternatives that either avoid or substantially reduce impacts on these resources." Due to the programmatic level of analysis in the EIR and lack of project-specific plans, it is not possible to define the

exact extent of potential impact, so it is not possible to ascertain with certainty whether the identified mitigation measures for these impacts will reduce impacts to levels considered "not significant." However, it is likely that, with proper design and planning, many of the identified impacts can be avoided or minimized.

• Short Term and Localized Impacts. Numerous impacts of the Transportation 2035 Plan would be short-term effects related to construction of new transportation facilities. The differences in short-term impacts, once mitigated, between the Transportation 2035 Plan and alternatives are not substantial. This is true particularly for water resources, biological resources, visual resources, and cultural resources, where project-level mitigation opportunities are extensive and sophisticated. Short-term impacts, for the most part, can be mitigated to levels that are not significant. However, in some instances the EIR analysis found enough uncertainty around short-term and cumulative localized effects at the program level that the impact was identified as significant and unavoidable as a conservative estimate of the potential effect (see first bullet point above). This uncertainty around short-term and cumulative localized effects also applies to the alternatives.

Ultimately, MTC identified significant environmental impacts that may not be mitigable as shown in Draft EIR Table S-1. These potentially significant and unavoidable impacts include:

- Increased vehicle miles traveled at Level of Service F for freeways, expressways, and arterial facilities;
- Increased construction-related emissions of criteria pollutants;
- Increased PM<sub>10</sub> and PM<sub>2.5</sub> emissions;
- Individually and cumulatively considerable conversion of farmland, including prime agricultural land designated by the State of California, to transportation use;
- Disruption or displacement of existing land uses, neighborhoods, and communities in the short-term;
- Cumulatively considerable increase in noise levels along some travel corridors;
- Adverse effects on special-status plant and/or wildlife species identified as endangered, candidate, and/or special status by the CDFG or USFWS;
- Cumulatively considerable conversion of undeveloped land to urban uses, contributing to the removal or fragmentation of habitat area;
- Individual and cumulative degradation of visual resources by adding or expanding development in rural or open space areas, blocking views from adjoining areas, blocking or intruding into important vistas, and changing the scale, character, and quality of designated or eligible Scenic Highways.

As described in the Findings (Appendix A of this document), many of these impacts will be substantially reduced through implementation of mitigation measures identified in the EIR. In other cases, the EIR states that impacts may be reduced to levels that are not significant, but the impact is still classified as "significant" because the effectiveness and feasibility of mitigation measures cannot be determined at this time due to the preliminary nature of the individual project locations and designs. In many instances, the EIR has identified a mitigation that is within the responsibility and jurisdiction of another agency to implement. MTC believes there is substantial evidence that impacts identified as less than significant with mitigation will in fact be mitigated by the incorporation of mitigation by other agencies. To the extent that there is some remaining potential that impacts will not be mitigated to a less-than-significant level, MTC hereby finds that those impacts are acceptable, in that the benefits of the Plan outweigh the remaining potential.

The following sections describe MTC's reasoning for approving the proposed Plan, despite these potentially significant unavoidable impacts.

## **PROPOSED TRANSPORTATION PLAN BENEFITS**

CEQA does not require lead agencies to analyze "beneficial impacts" in an EIR. Rather, EIRs focus on potential "significant effects on the environment" defined to be "adverse." (Public Resources Code Section 21068) Nevertheless, decision makers may be aided by information about project benefits. These benefits can be cited, if necessary, in a statement of overriding considerations (CEQA Guidelines Section 15093). MTC's decision to adopt the Transportation 2035 Plan rather than any of the alternatives is based on considering the balance of these benefits of the proposed Project against its identified unavoidable environmental impacts:

• The transportation goals, strategies, and improvements proposed in the Transportation 2035 Plan were derived from an extensive regional agency and public outreach effort lead by MTC, and they reflect broad agency and public support, as documented in the Transportation 2035 Plan and supplemental public outreach reports.

The purpose and contents of Regional Transportation Plans (RTPs) are specified in Federal and State statute – the Federal metropolitan transportation planning rule is set forth in Title 23 CFR Part 450 and 49 CFR Part 613 and the State transportation planning rule is codified in California Government Code Section 65080(c). The federal metropolitan transportation planning rules calls for the metropolitan transportation planning process to provide for consideration and implementation of projects, strategies, and services that will address planning factors pertaining to economic vitality, transportation safety, transportation, transportation system integration and connectivity, efficient system management and operation, and preservation of the existing transportation system. Furthermore, according to the California Transportation Commission's 2007 Regional Transportation Plan Guidelines which was prepared pursuant to Government Code Section 65080(c), the purpose of RTPs is to "encourage and promote the safe and efficient management, operation and development of a regional intermodal transportation system that will serve the mobility needs of goods and people."

As required by federal and state metropolitan planning regulations, the Transportation 2035 Plan transportation goals, objectives, and strategies therefore are not only derived from federal planning factors but also established to support the movement of goods and people through the development of a safe, efficient, well-integrated regional transportation system.

- The Transportation 2035 Plan is consistent with the California Transportation Plan and other plans developed by cities, counties, districts, Native American Tribal Governments, and State and Federal agencies in responding to Statewide and interregional transportation issues and needs. Specifically, the Transportation 2035 Plan is consistent with adopted countywide transportation plans and priorities, as well as voter approved county transportation sales tax expenditure plans and bridge toll programs. These plans and priorities, in turn, reflect the input and concerns of county congestion management agencies, transit operators, local governments, and members of the public.
- The program of projects in the Transportation 2035 Plan meets the policy goals and objectives established by MTC for a long-range regional transportation plan better than the alternatives.
- The Commission established a three-prong policy framework for the Transportation 2035 Plan: (a) the Three Es of economy, environment and equity serve as the umbrella policy structure, (b) the eight plan goals of maintenance & safety, reliability, efficient freight travel, security & emergency management, clean air, climate protection, equitable access, and livable communities reinforce each of the Three Es, and (c) the performance objectives of reducing congestion, vehicle miles traveled, carbon dioxide and particulate matter pollution, improving transportation-housing affordability, and improving maintenance, safety and security of the transportation system serve as benchmarks to measure the region's progress in meeting the Three Es and goals. As reflected in the Transportation 2035 Plan, the Commission defined a comprehensive mix of transportation policies, strategies and investments that strike a balance at meeting the plan's Three Es, goals and performance objectives.
- The alternatives chosen for evaluation in the Draft EIR do reflect the careful consideration of potential for achieving these basic project goals and objectives. MTC designed alternatives that balanced the goal of greenhouse gas reduction with the other plan goals described above, and came up with alternatives predicated on increased investment in operations and maintenance which would reduce other potentially significant adverse effects as well without jeopardizing the safety and functionality of the system. However, on the whole, the Transportation 2035 Plan does a superior job in striking a good balance at meeting the plan's goals and objectives, as outlined below, although is not environmentally superior to the alternatives in all respects, as discussed in Appendix A: Findings and Facts in Support of Findings.
- The Transportation 2035 Plan would improve mobility in 2035 as compared with existing conditions and the No Project alternative by increasing accessibility to jobs by both automobile and transit mode for all time intervals of 15, 30, and 45 minutes.
- The Transportation 2035 Plan would improve mobility in 2035 as compared with the No Project alternative by significantly decreasing VMT at LOS F for all road facility types.
- The Transportation 2035 Plan would not interfere with the attainment and maintenance of federal and state air quality standards, as follows:
  - Reactive organic gases, nitrogen oxides, and carbon monoxide would decrease substantially compared to today's emissions (ranging from 72 percent to 80 percent less) due largely to the continued long term effects of California's stringent

automobile engine emission controls. The Transportation 2035 Plan would reduce emissions of all types of pollutants in 2035 by 0.7 percent to 1.3 percent compared to the No Project conditions.

- Compared to existing conditions, particulate matter would increase by 28 percent for PM10 and by 19 percent for PM2.5, which is an improvement on the performance of the last RTP. These emissions are due to the projected cumulative regional growth in vehicle miles of travel; however the Transportation 2035 Plan would decrease emissions of particulate matter by 0.7 percent for PM10 and by 1.2 percent for PM2.5 compared to the No Project condition.
- The Transportation 2035 Plan results in lower rates of transportation-related energy consumption than existing conditions, as a result of the enforcement of stricter fuel efficiency standards as well as decreased congestion due to Plan projects resulting in more efficient vehicle movement.
- The Transportation 2035 Plan would result in better future environmental outcomes than all alternatives in terms of long term noise exposure.
- The Transportation 2035 Plan would result in better future environmental outcomes than the No Project condition in the areas of greenhouse gases and climate change and seismic risk exposure.
- The Transportation 2035 Plan, by including the Regional HOT Network, augments its own budget by providing reasonably foreseeable access to an additional \$6.1 billion in net revenue that can be directed to other important corridor mobility and operational investments.
- The Transportation 2035 Plan includes effective roadway performance-enhancing programs (such as the Freeway Performance Initiative) to reduce congestion, and critical new intra-and inter-regional transit connections (such as Resolution 3434 Regional Transit Expansion Program, Transportation for Livable Communities Program, and even locally-implemented initiatives such as Safe Routes to Schools and Transit Programs) that will improve the overall attractiveness and functionality of the transit network.
- The Transportation 2035 Plan would support mobility between the Bay Area and neighboring regions by improving highway and transit through key interregional gateways, and thus contribute to the economic well being and quality of life for these areas as well as the Bay Area.

## **OVERRIDING CONSIDERATIONS CONCLUSIONS**

MTC finds that the proposed Transportation 2035 Plan has been carefully reviewed and that the mitigation measures identified in the Final EIR have been included in the Mitigation Monitoring Plan adopted by the Commission. Nonetheless, the proposed Plan may have certain environmental effects, which cannot be avoided or substantially lessened. As to these significant environmental effects that are not avoided or substantially lessened to a point less than significant, the MTC finds that specific fiscal, economic, social, technological, or other considerations make additional mitigation of those impacts infeasible, in that all feasible mitigation measures have been incorporated into the proposed Plan.

The Commission has carefully considered all of the environmental impacts that have not been mitigated to an insignificant level, as listed above. The Commission has also carefully considered the fiscal, economic, social, and environmental benefits of the proposed Plan, as listed above, and compared these with the benefits and impacts of the alternatives, which were evaluated in the EIR. The Commission has balanced the fiscal, economic, social, and environmental benefits of the proposed Plan against its unavoidable and unmitigated adverse environmental impacts and, based upon substantial evidence in the record, has determined that the benefits of the proposed Plan outweigh, and therefore override, the remaining adverse environmental effects. Such benefits provide the substantive and legal basis for this Statement of Overriding Considerations.

Based on the foregoing and pursuant to Public Resources Code section 21081 and State CEQA Guidelines section 15093, the Commission further determines that the unavoidable adverse environmental effects of the proposed Plan are acceptable, and that there are overriding considerations which support the Commission's approval of the proposed Plan, as stated in the above sections.

MTC believes that it is prudent to select this Plan over the alternatives because it provides dramatic improvements over the continuation of the existing Transportation 2030 Plan and makes the most of MTC's current authority, regional planning efforts, and cooperative relationship with local CMAs. In making this determination, MTC incorporates by reference the Findings and Facts in Support of Findings set forth in Appendix A, as well as all of the supporting evidence cited therein, within the Draft and Final EIR, and in the administrative record.

Transportation 2035 Plan Final Environmental Impact Report

This page intentionally left blank.

# Appendix C: Mitigation Monitoring Program

# Appendix C: Mitigation Monitoring Program

This Mitigation Monitoring Program has been prepared for the EIR for the Transportation 2035 Plan in accordance with the State's mitigation monitoring statute, Public Resource Code Section 21081.6, and sections 15091 (d) and 15097 of the California Environmental Quality Act (CEQA). These provisions require public agencies to establish mitigation monitoring or reporting programs for projects where they have identified significant adverse impacts and mitigation measures to reduce or avoid these significant impacts. The public agency must adopt the monitoring and reporting program when approving a project. The intent of these provisions is to ensure that mitigation measures are fully implemented.

#### PURPOSE OF MITIGATION MONITORING PROGRAM

To ensure that mitigation measures established for significant environmental impacts identified through the CEQA process are fully implemented, the Public Resources Code was amended in 1988 (codified as Section 21081.6) to require a reporting or monitoring program "designed to ensure compliance during project implementation." Every time a Lead Agency—such as the MTC—approves a mitigated negative declaration or an EIR that identifies significant impacts and measures to mitigate them, it must also prepare a mitigation-monitoring program. CEQA Guidelines Section 15097 was added in 1999 to further clarify agency requirements for mitigation monitoring or reporting.

The Transportation 2035 Plan EIR identified significant environmental impacts and measures that would mitigate those impacts. This document outlines a program for the implementation and monitoring of those mitigation measures. The purpose of this program is to document that the mitigation measures will be implemented and that environmental impacts are reduced to the level identified in the Plan EIR. One of the basic premises of the Mitigation Monitoring Program is that agencies responsible for carrying out individual projects identified in the Transportation 2035 Plan are also responsible for mitigating their impacts.

Because the Transportation 2035 Plan contains projects that would be developed by agencies other than MTC and located within numerous jurisdictions within the region, MTC finds that the implementation of some mitigation measures listed in Appendix A of this document are not within its jurisdiction. These measures can and should be implemented and monitored by agencies responsible for implementing and overseeing the implementation of the individual projects contained in the Transportation 2035 Plan. These agencies include both project sponsors—local jurisdictions, transit agencies, county congestion management agencies, county transportation authorities, and Caltrans—as well as agencies responsible for the conservation of natural resources. These latter agencies include the Bay Area Air Quality Management District, the San Francisco Bay Conservation and Development Commission, the Regional Water Quality Control Board, the U.S. and California Environmental Protection Agencies, the Department of Fish and Game, and the U.S. Army Corps of Engineers. Ultimately, MTC will ensure compliance

with the identified mitigation measures by requiring individual projects to undergo CEQA and NEPA (if applicable) review prior to project approval by MTC.

This Mitigation Monitoring Program includes a discussion of agency roles and responsibilities for mitigation measure implementation and monitoring, general monitoring procedures, and timing of mitigation measure implementation. To ensure compliance with CEQA, this document summarizes the actions to be taken to implement the mitigation measures prescribed for the Plan EIR. These measures are to be implemented to reduce adverse environmental impacts of individual projects on the resource areas of Transportation, Air Quality, Land Use, Greenhouse Gases and Climate Change, Noise, Geology, Water Resources, Biological Resources, Visual Resources, and Cultural Resources.

#### **MTC'S ROLE**

Although MTC is the lead agency for developing the Transportation 2035 Plan, MTC will likely not be the lead agency or project sponsor for individual projects identified in the Plan. Most mitigation measures listed in the Plan EIR are project-level, rather than program-level measures, and must be implemented through the course of specific project design and engineering, permitting, and construction by the project sponsor. Therefore, the MTC's primary role is as a responsible agency to oversee future project-level CEQA analyses to ensure incorporation of measures identified in the Plan EIR. MTC's role thus includes:

- **Requiring** sponsors of the transportation projects to comply with CEQA and NEPA, if applicable, prior to project approval by MTC;
- Evaluating proposed projects to identify changes and best practices that would reduce identified environmental impacts;
- **Recommending** to sponsors, as appropriate, mitigation measures identified in this EIR and other site-specific measures that are developed during the course of individual project environmental analysis to ensure that potential impacts outlined in this EIR are adequately addressed and mitigated;
- **Requesting** details as necessary in the project-level monitoring and reporting programs to ensure follow-up and continued compliance throughout construction and operational phases;
- **Reviewing** mitigation monitoring status reports (pursuant to MTC Resolution 1481, Revised) and following up if reports show mitigation efforts are performing below reasonable expectations;
- Updating the Regional Transportation Plan at least every four years and the Transportation Improvement Program (TIP) every four years, including preparing a transportation air quality conformity finding pursuant to the Federal Clean Air Act; and
- Working with regional agencies and other bodies to implement other actions that would minimize the environmental impacts of the Transportation 2035 Plan.

#### **MTC Measures and Monitoring**

Regarding the last bullet point, the measures from the Draft EIR for which MTC takes primary responsibility are listed below. In most cases, these measures will be implemented over an

extended time period. MTC will monitor progress on these mitigation measures and report to interested persons and other responsible agencies through, at minimum, the actions and minutes of the Joint Policy Committee meetings, which occur bi-monthly or more often as necessary.

**2.1(a)** MTC, ABAG, BCDC and BAAQMD—as represented through the Joint Policy Committee (JPC) which coordinates the regional planning efforts of the four agencies—shall work to leverage existing funds (including the \$2.2 billion in funds committed in the proposed Transportation 2035 Plan for the Transportation for Livable Communities Program) and seek additional funds to provide financial incentives to local governments that volunteered to designate their communities as Priority Development Areas (PDAs) through the FOCUS program and commit to build higher density residential and mixed use development near transit.

**2.1(b)** MTC, in partnership with ABAG, BCDC, BAAQMD, local governments, and employers who would like to participate, will seek opportunities to conduct research on and promote value pricing of parking and other innovative parking strategies, for example:

- Employer parking "cash out" programs, which allow employees to forego a parking spot in favor of cash or a subsidized transit pass;
- Residential parking "opt-out" programs, which reduce city parking requirements in favor of developer funded cash to residents and/or transit passes, carshare membership, bicycle rentals, or alternative modes;
- Local parking self-financing programs, which price parking to fund transit passes, alternative modes, and/or provide cash directly to workers and residents;
- "Green certification" of local parking policy regulations aimed at reducing vehicle miles traveled; and
- Technical assistance programs to remove barriers that prevent local governments from implementing parking pricing programs.

**2.1(c)** MTC shall advocate to State and federal legislators for new incentive funding for local governments to take steps to encourage higher density and mixed use developments near transit, including strategies such as (a) revising land use plans and zoning codes to remove barriers that may prevent such development; or (b) providing incentives to developers through density bonuses or expedited development review.

**2.2(b)** MTC and BAAQMD, in partnership with ARB and other partners who would like to participate, shall work to leverage existing air quality and transportation funds and seek additional funds to continue to implement the BAAQMD's Lower-Emission School Bus Program (LESBP) to retrofit older diesel school buses with emission control devices and replace older school buses with clean school buses, and to develop and implement other similar programs aimed at retrofits and replacements of heavy duty fleet vehicles.

2.2(c) MTC and BAAQMD, in partnership with the Port of Oakland, ARB, and other partners who would like to participate, shall work together to identify, prioritize and

implement actions beyond those identified in the Statewide Goods Movement Emission Reduction Plan to reduce diesel PM and other air emissions.

**2.2(d)** MTC and BAAQMD, in partnership with the Port of Oakland, ARB, and other partners who would like to participate, shall work together to secure incentive funding that may be available through the Carl Moyer Memorial Air Quality Standards Attainment Program to reduce port-related emissions.

**2.2(e)** MTC and BAAQMD, in partnership with the Port of Oakland, ARB, and other partners who would like to participate, shall work together to secure Proposition 1B Goods Movement Emission Reduction Program funds to invest in Bay Area related programs. These funds directly support early and accelerated diesel PM reduction programs and can help ease the transition into compliance with adopted and proposed ARB regulations.

**2.2(f)** MTC and BAAQMD, in partnership with the Port of Oakland, ARB, and other partners who would like to participate, shall work together to develop and seek resources for the San Francisco Bay Area Green Ports Initiative, which is a program to reduce air pollution from trucks, ships and other equipment associated with Bay Area port operations.

**2.3(d)** Through regional programs such as the Transportation for Livable Communities Program, Regional Bicycle Program, etc., MTC shall continue to support locally sponsored traffic calming and alternative transportation initiatives, such as paths, trails, overcrossings, bicycle plans, and the like that foster improved neighborhoods and community connections.

**2.3(e)** MTC shall continue to participate in and promote the efforts of the multi-agency FOCUS project, which is intended to coordinate regional growth efforts to use land more efficiently, optimize transportation and other infrastructure investments in existing communities that focus new development near existing transit, preserve open space, etc. In this way, MTC, in partnership with regional agencies such as ABAG, and advocacy groups such as Greenbelt Alliance and TransForm (formerly TALC), can pursue the enhanced coordination of local land use planning with transportation investments in the proposed Transportation 2035 Plan.

**2.5(a)** MTC shall commit to working with ABAG, BCDC, and BAAQMD, through the JPC, to develop a set of "green construction" policies and best practices that encourage use of lowest emitting construction equipment and fuels (e.g., diesel-powered vehicles meeting the most current ARB-certified tier or better engines).

**2.5(c)** MTC will work with BCDC, in partnership with the regional agencies and other partners who would like to participate, to conduct a vulnerability assessment for the region's transportation infrastructure and identify the appropriate adaptation strategies to protect those transportation resources that are likely to be impacted and are a priority for the region to protect. This assessment should build off of but not duplicate current BCDC efforts and research underway.

#### In Support of a Regional Mitigation Strategy

In its role as a regional transportation planning agency, and in cooperation with its partner regional agencies ABAG, BAAQMD, and BCDC, MTC is identifying opportunities for region-wide coordination to achieve environmental protection goals, through the Joint Policy Committee's efforts to coordinate implementation of Assembly Bill 32 and Senate Bill 375 and through ongoing interagency consultation with federal/state resource agencies, Tribal governments, and other stakeholders. Key opportunities to enhance coordinated mitigation efforts may include increased integration of conservation mapping data to inform easement decisions and project location choices (a process that has already begun in the Plan EIR in the preparation of the regional farmland and sea level rise maps, among others) and enhanced travel and socioeconomic demographic forecast models. Mitigation measures 2.3(e) and 2.5(c) (listed above) support this effort. MTC will continue to support and advance the goals of the JPC and the region's ability to meet SB 375 requirements by pursuing opportunities for regional coordination.

### PROJECT SPONSORS AND PROJECT-LEVEL REVIEW

Project sponsors are the agencies responsible for environmental review, design, right-of-way procurement, and construction of individual projects included in the Transportation 2035 Plan.

The analysis contained in the EIR on the Transportation 2035 Plan is at a "program level" which evaluates the general range of impacts and mitigation measures that may be defined for the entire program of projects (CEQA Guidelines Section 15168). However, many of the projects proposed in the Transportation 2035 Plan have not yet completed CEQA review because they have not yet been programmed or sufficiently defined to have a meaningful CEQA review at the project level. The project sponsors are thus responsible for conducting project-level environmental review consistent with CEQA and NEPA, if applicable, for Transportation 2035 Plan projects they implement. Specifically, project sponsors are responsible for the following:

- **Conducting** project-level CEQA and NEPA (as applicable) analysis where a transportation project has the potential to cause or contribute to a significant impact on the environment (at minimum addressing the potentially significant impacts already identified at the program level through this EIR);
- **Reviewing** this EIR and considering applicable impact findings and mitigation measures herein when completing the project-level analysis and proposing mitigation measures;
- Notifying MTC and other responsible, trustee, or interested public agencies in a timely manner of the CEQA and/or NEPA process underway and how said agencies may consult on that process;
- **Responding** to written comments on impacts and mitigation measures from public agencies (including MTC) and interested groups/individuals;
- Adopting adequate mitigation measures and a mitigation monitoring and reporting program for those transportation projects with significant impacts;

- **Delivering** to MTC the response to comments on the EIR and final recommendations for certification of the EIR or mitigated negative declaration and the mitigation monitoring and reporting program, for review and comment prior to project EIR certification; and
- **Reporting** to MTC on compliance with mitigation measures pursuant to MTC Resolution 1481, Revised, and should mitigations perform below reasonable expectations, reporting to MTC about these low-performing mitigations and modifying them accordingly.

## **OTHER RESPONSIBLE AND TRUSTEE AGENCIES**

The other regional planning agencies (ABAG, BAAQMD, and BCDC) shall support MTC's implementation of program-level mitigation measures listed above, through their roles as described specifically in the mitigation measures themselves, as well as through on-going consultation and coordination efforts.

Agencies charged with the protection and conservation of natural resources shall help to ensure the mitigation of significant impacts through providing comments on project CEQA and NEPA documents, and through permit issuance standards and conditions.

### TIMING

Most of the mitigation measures are related to specific site design and construction practices and will therefore be required during the design phase, pre-construction phase, and/or construction phase of individual projects. Project-specific mitigation monitoring programs may necessitate onsite environmental monitors during construction activities. Individual projects will progress through development stages at different times throughout the planning period. Nonetheless, project sponsors or their agents will be responsible for successfully implementing and enforcing the mitigation measures, and MTC will help to ensure compliance by receiving and reviewing status reports pursuant to MTC Resolution 1481, Revised.

One of the key components of a monitoring program is to determine whether or not mitigation measures are effective in reducing impacts to levels that are less than significant. Standards for successful mitigation are implicit in many mitigation measures that include such requirements as avoiding a specific impact entirely. Project sponsors will be required to compare residual impacts (after mitigation measures are implemented) to either a) the Transportation 2035 Plan EIR significance criteria or b) subsequent site-specific project EIR significance criteria or specific mitigation performance standards in order to determine mitigation measure effectiveness. MTC may conduct a comprehensive review of measures that are not effectively mitigating impacts at any time it deems appropriate.

Appendix D: MTC Resolution Certifying the EIR on the Transportation 2035 Plan

Appendix D: MTC Resolution Certifying the EIR on the Transportation 2035 Plan Date: April 22, 2009 W.I.: 1121 Referred by: Planning Committee

## ABSTRACT

## Resolution No. 3892

This resolution certifies the Final Environmental Impact Report for the Transportation 2035 Plan.

Transportation 2035 Plan Final Environmental Impact Report

Date: April 22, 2009 W.I.: 1121 Referred by: Planning Committee

## Re: Final Environmental Impact Report for the Transportation 2035 Plan

## METROPOLITAN TRANSPORTATION COMMISSION RESOLUTION NO. 3892

WHEREAS, the Metropolitan Transportation Commission (MTC) is the regional transportation planning agency for the San Francisco Bay Area pursuant to Government Code Sections 66500 et seq.; and

WHEREAS, MTC staff and its consultants have prepared a program-level Environmental Impact Report (EIR) for the Transportation 2035 Plan, pursuant to provisions of the California Environmental Quality Act (CEQA); and

WHEREAS, on December 19, 2008 MTC released for public review and comment the Draft EIR for the Transportation 2035 Plan, and, following a 45-day public review period ending February 2, 2009, responded to all comments received and incorporated technical corrections and revisions in response to comments where appropriate into the Final EIR; and

WHEREAS, CEQA requires that MTC provide a written response to each public agency that commented on the Draft EIR ten days before the certification of the Final EIR, and MTC compiled with this requirement by transmitting the written responses to each public agency on March 2, 2009; and

WHEREAS, MTC staff and its consultants have prepared Findings and Facts in Support of Findings, Statement of Overriding Considerations, and Mitigation Monitoring Program and incorporated them as appendices to the Final EIR; and MTC Resolution No. Approprix D: MTC Resolution Certifying the EIR on the Transportation 2035 Plan Page 2

WHEREAS, MTC has reviewed and considered the information contained in the Final EIR, including Findings and Facts in Support of Findings, Statement of Overriding Considerations, and Mitigation Monitoring Program; now, therefore, be it

RESOLVED, that MTC has reviewed the Final Environmental Impact Report for the Transportation 2035 Plan, included herein as Attachment A and made a part hereof by reference, and certifies the following in accordance with CEQA Guidelines Section 15090:

- (A) The Final EIR has been completed in compliance with CEQA;
- (B) The Commission reviewed and considered the information contained in the Final EIR, prior to considering the proposed Transportation 2035 Plan; and
- (C) The Final EIR reflects the independent judgment and analysis of the Commission.

Scott Ha

The above resolution was entered into by the Metropolitan Transportation Commission at a regular meeting of the Commission held in Oakland, California, on April 22, 2009.

METROPOLITAN TRANSPORTATION COMMISSION

Transportation 2035 Plan Final Environmental Impact Report Date: April 22, 2009 W.I.: 1121 Referred by: Planning Committee

> Atlachment A Resolution No. 3892 Page 1 of 1

# Draft and Final Environmental Impact Report for the Transportation 2035 Plan

A copy of the Draft and Final Environmental Impact Report for the Transportation 2035 Plan documents are on file in the offices of the Metropolitan Transportation Commission located at the Joseph P. Bort MetroCenter, 101 Eighth Street, Oakland, California 94607. Appendix E: MTC Resolution 1481, Revised

Appendix E: MTC Resolution 1481, Revised

Date: February 27, 1985 14.1: 902-80-01 WA.: 9478R Referred By: WPPRC Revised: 07/23/08-C

## **ABSTRACT**

Resolution No. 1481, Revised

This resolution approves and adopts the Environmental Guidelines of the Metropolitan Transportation Commission. This resolution supersedes MTC Resolution No. 76 and 750.

This resolution was revised on July 23, 2008 to amend the guidelines pursuant to state statute. See Deputy Director's memorandum on this subject dated July 3, 2008. Transportation 2035 Plan Final Environmental Impact Report

Date: February 27, 1985 W.I.: 902-80-01 W.A.: 9478R Referred By: WPPRC

## Re: <u>Adoption of the Environmental Guidelines of the Metropolitan Transportation</u> <u>Commission</u>.

METROPOLITAN TRANSPORTATION COMMISSION

**RESOLUTION NO. 1481** 

WHEREAS, the Metropolitan Transportation Commission (MTC) is the regional transportation planning agency for the San Francisco Bay Area pursuant to Government Code § 66500 et seq.; and

WHEREAS, the California Environmental Quality Act (CEQA)(Public Resources Code § 21000 <u>et seq</u>.) provides that all public agencies shall adopt criteria and procedures for the evaluation of projects and the preparation of environmental impact reports; and

WHEREAS, the Commission adopted "MTC Environmental Objectives Criteria and Environmental Review Procedures" on June 13, 1973 (MTC Resolution No. 76); and

WHEREAS, the Commission approved and adopted on January 23, 1980 (MTC Resolution No. 750) the document entitled "Environmental Procedures of the Metropolitan Transportation Commission." dated December 6, 1979; and

WHEREAS, the Commission approved and adopted on March 25, 1981 (MTC Resolution No. 750, Revised) the revised "Environmental Procedures of the Metropolitan Transportation Commission," dated January 23, 1980; and

WHEREAS, new guidelines have been drafted in conformance with amendments to the State CEQA Guidelines (14 Cal. Admin. Code § 15000 <u>et seq</u>.) adopted in August 1983 by the California Secretary for Resources; now, therefore, be it

18 1

Appendix E: MTC Resolution 1481, Revised

Resolution No. 1481 page two

<u>RESOLVED</u>, that the Metropolitan Transportation Commission approves and adopts the "Environmental Guidelines of the Metropolitan Transportation Commission," attached hereto and marked Attachment A, and said Environmental Guidelines shall supercede the "Environmental Procedures of the Metropolitan Transportation Commission" and the "MTC Environmental Objectives Criteria and Environmental Review Procedures."

ORTATION COMMISSION METROPOLITA

Robert I. Schroder, Chairman

The above resolution was entered into by the Metropolitan Transportation Commission at a regular meeting of the Commission held in Martinez, California, on February 27, 1985. Transportation 2035 Plan Final Environmental Impact Report Date: February 27, 1985 W.I.: 902-80-01 W.A.: 9478R Referred By: WPPRC Revised: July 23, 2008 – PC

> Attachment A Resolution No. 1481, Revised Page 1 of 2

## Environmental Guidelines of the Metropolitan Transportation Commission Revised July, 2008

Pursuant to 14 Cal. Admin. Code § 15022(d), the Metropolitan Transportation Commission adopts the State CEQA Guidelines (14 Cal. Admin. Code § 15000 et. seq.), by this reference as set forth in full with the following additions:

MTC has determined that the following specific activities are within the categorical exemptions established by the state CEQA Guidelines, as authorized by 14 Cal. Admin. Code Section 15300.4:

"Section 15300.4. Application by Public Agencies. Each public agency shall, in the course of establishing its own procedures, list those specific activities, which fall within each of the exempt classes, subject to the qualification that these lists must be consistent with both the letter and the intent expressed in the classes. Public agencies may omit from their implementating procedures classes and examples that do not apply to their activities, but they may not require EIRs for projects described in the classes and examples in this article except under the provisions of Section 15300.2."

The Class I categorical exemption reads as follows:

"Section 15301. Class 1 consists of the operation, repair, maintenance, or minor alteration of existing public or private structures, facilities, mechanical equipment, or topographical features, involving negligible or no expansion of use beyond that previously existing, including but not limited to:

(c) Existing highways and streets, sidewalks, gutters, bicycle and pedestrian trails, and similar facilities except where the activity will involve removal of a scenic resource including a stand of trees, a rock outcropping, or an historical building."

MTC finds this exemption includes but is not limited to the following:

Reconstruction or modification of an existing bridge structure on essentially the same alignment or location (e.g., widening less than a single travel lane, adding shoulders or safety lanes, walkways, bikeways, or pipelines) except bridges on or eligible for inclusion on the National Register or bridges providing access to barrier islands.

#### Appendix E: MTC Resolution 1481, Revised

Attachment A Resolution No. 1481, Revised Page 2 of 2

Reconstruction or modification of an existing one lane bridge structure, presently serviced by a two lane road and used for two lane traffic, to a two lane bridge on essentially the same alignment or location, except bridges on or eligible for inclusion on the National Register or bridges providing access to barrier islands.

Construction of bicycle and pedestrian lanes, paths, and facilities.

Modernization of an existing highway by resurfacing, restoration, rehabilitation, widening, adding shoulders, adding auxiliary lanes for localized purposes (e.g., weaving, turning, climbing), and correcting substandard curves and intersections. This classification is not applicable when the proposed project requires acquisition of more than minor amounts of right—of—way or substantial changes in access control

Highway safety or traffic operations improvement projects including the correction or improvement of high hazard locations, elimination of roadside obstacles, highway signing, pavement markings, traffic control devices, railroad warning devices, and lighting. This classification is not applicable when the proposed action requires acquisition of more than minor amounts of right—of-way or substantial changes in access control.

Project administration and operating assistance to transit authorities to continue existing service or increase service to meet demand.

Pursuant to Division 13 (Environmental Quality), Chapter 2.6, Section 21081.7 of the California Public Resources Code was added in 1989:

21081.7. Transportation information resulting from the reporting or monitoring program required to be adopted by a public agency pursuant to Section 21081.6 shall be submitted to the transportation planning agency in the region where the project is located and to the Department of Transportation for a project of statewide, regional, or areawide significance according to criteria developed pursuant to Section 21083. The transportation planning agency and the Department of Transportation shall adopt guidelines for the submittal of those reporting or monitoring programs.

In compliance with this code section, MTC adopts the following guidelines for submittal of those reporting or monitoring programs:

If a project sponsor has mitigation measures under way pursuant to Cal. PRC Section 21083.6, it must file status reports, pursuant to Cal. PRC Section 21083.7, with MTC's Planning Director. Status reports will be forwarded by the MTC Planning Director to MTC's Planning Committee for information.

Transportation 2035 Plan Final Environmental Impact Report

7/23/08 Supersedec date C or Cte

ż

Date: February 27, 1985 W.I.: 902-80-01 W.A.: 9478R Referred By: WPPRC

> Attachment A Resolution No. 1481 Page 1 of 2

## Environmental Guidelines of the Metropolitan Transportation Commission Revised February 1985

Pursuant to 14 Cal. Admin. Code § 15022(d), the Metropolitan Transportation Commission adopts the State CEQA Guidelines (14 Cal. Admin. Code § 15000 etseq.), by this reference as set forth in full with the following additions:

MTC has determined that the following specific activities are within the categorical exemptions established by the state CEQA Guidelines, as authorized by 14 Cal. Admin. Code Section 15300.4:

"Section 15300.4. Application by Public Agencies. Each public agency shall, in the course of establishing its own procedures, list those specific activities which fall within each of the exempt classes, subject to the qualification that these lists must be consistent with both the letter and the intent expressed in the classes. Public agencies may omit from their implementating procedures classes and examples that do not apply to their activities, but they may not require EIRs for projects described in the classes and examples in this article except under the provisions of Section 15300.2."

The Class 1 categorical exemption reads as follows:

"Section 15301. Class 1 consists of the operation, repair, maintenance, or minor alteration of existing public or private structures, facilities, mechanical equipment, or topographical features, involving negligible or no expansion of use beyond that previously existing, including but not limited to:

"(c) Existing highways and streets, sidewalks, gutters, bicycle and pedestrian trails, and similar facilities except where the activity will involve removal of a scenic resource including a stand of trees, a rock outcropping, or an historical building."

MTC finds this exemption includes but is not limited to the following:

. Reconstruction or modification of an existing bridge structure on essentially the same alignment or location (e.g., widening less than a single travel lane, adding shoulders or safety lanes, walkways, bikeways, or pipelines) except bridges on or eligible for inclusion on the National Register or bridges providing access to barrier islands. Reconstruction or modification of an existing one lane bridge structure, presently serviced by a two lane road and used for two lane traffic, to a two lane bridge on essentially the same alignment or location, except bridges on or eligible for inclusion on the National Register or bridges providing access to barrier islands.

. . .

Appendix E: MTC Resolution 1481, Revised Attachment A Resolution No. 1481 Page 2 of 2

. Construction of bicycle and pedestrian lanes, paths, and facilities.

1 :

- Modernization of an existing highway by resurfacing, restoration, rehabilitation, widening, adding shoulders, adding auxiliary lanes for localized purposes (e.g., weaving, turning, climbing), and correcting substandard curves and intersections. This classification is not applicable when the proposed project requires acquisition of more than minor amounts of right-of-way or substantial changes in access control.
- Highway safety or traffic operations improvement projects including the correction or improvement of high hazard locations, elimination of roadside obstacles, highway signing, pavement markings, traffic control devices, railroad warning devices, and lighting. This classification is not applicable when the proposed action requires acquisition of more than minor amounts of right-of-way or substantial changes in access control.
- Project administration and operating assistance to transit authorities to continue existing service or increase service to meet demand.



 Transportation 2035 Plan Final Environmental Impact Report

 METROPOLITAN
 Joseph P. Ba

 TRANSPORTATION
 101 Eighth 1

 COMMISSION
 TEL, \$10.8

Joseph P. Bort MetroCenter 101 Eighth Street Oakland, CA 94607-4760 TEL, \$10,817,3700 TDD/UTY \$10,817,5769 PAX \$10,817,5848 R-MAIL info@mm.ca.gov WEB www.muc.ca.gov

# Memorandum

- TO: Planning Committee
- FR: Deputy Executive Director, Policy

W. I.

DATE: July 3, 2008

RE: <u>Environmental Impact Report (EIR) Mitigation Monitoring Reporting; MTC Resolution No. 1481,</u> <u>Revised</u>

## Background

California Environmental Quality Act (CEQA)(CA Public Resources Code Section 21000 et seq) requires that all public agencies adopt criteria and procedures for the evaluation of projects and the preparation of environmental impact reports. The Commission adopted "Environmental Guidelines of the Metropolitan Transportation Commission" as part of MTC Resolution 1481 in February 1985 to comply with CEQA statute.

CEQA guidelines were subsequently amended pursuant to CA Public Resources Code Section 21081.6, which required public agencies to develop monitoring and reporting for changes to a project in order to mitigate or avoid significant effects on the environment. CEQA guidelines were further amended to require local agencies to submit transportation-related environmental monitoring and reporting plans to Caltrans and the appropriate regional transportation planning agency, who are required to adopt guidelines for the submittal of the plans pursuant to CA Public Resources Code Section 21081.7. If a project sponsor has mitigation measures under way pursuant to Cal. PRC Section 21083.6, it must file status reports, pursuant to Cal. PRC Section 21083.7, with MTC's Planning Director. Status reports will be forwarded by the MTC Planning Director to MTC's Planning Committee for information.

## Staff Recommendation

Staff recommends that the Planning Committee refer <u>MTC Resolution 1481, Revised</u> to the Commission for approval to amend its guidelines pursuant to CA Public Resources Code Section 21081.7.

Therese Mathing

Therese McMillan

TM: DK DCOMMITTE/Planning Committee/2008/July08/Monitoring memoidoc

72035 DEIR

# 2.3 Land Use and Housing

The San Francisco Bay Area has grown from the sparsely populated Native American and then Spanish settlements of the past to an urban area of nearly seven million people today. Land uses in the Bay Area include one of the most densely populated urban centers in the United States (the City of San Francisco) as well as open hills and shorelines, growing suburban areas, and valued agricultural conservation areas.

This chapter evaluates the potential effects of the proposed Transportation 2035 Plan on land use and housing in the Bay Area. It describes trends in use of land for residential and employment purposes and trends in the density of new development projected by the Association of Bay Area Governments (ABAG).<sup>1</sup> This chapter also describes the projected housing trends for the Bay Area through 2035. The impact analysis addresses the potential impacts of the proposed Transportation 2035 Plan on the conversion or loss of important agricultural lands, open space, or natural areas; project consistency with adopted land use plans; and community displacement and disruptions, including potential loss of housing and businesses and separation of people from community resources.

#### **ENVIRONMENTAL SETTING**

#### PHYSICAL SETTING

The study area consists of the nine counties in the Bay Area—Alameda, Contra Costa, Marin, Napa, San Francisco, San Mateo, Santa Clara, Solano, and Sonoma. The physical setting includes current and projected land use patterns, urban development trends and densities, agricultural uses, and housing.

#### Land Use Patterns

Since World War II, the San Francisco Bay Area has grown from a primarily agricultural region with one major city (San Francisco) to the fifth most populous metropolitan region in the United States<sup>2</sup> with multiple centers of employment, residential development, and peripheral agricultural areas. The pattern of land uses in the Bay Area includes a mix of open space, agriculture, intensely developed urban centers, a variety of suburban employment and residential areas, and scattered older towns. This pattern reflects the landforms that physically define the region, the Bay, rivers, and valleys. Major urban areas are located around the Bay, with the older centers close to the Golden Gate. Newer urban areas are found in Santa Clara County to the south, the valleys of eastern Contra Costa and Alameda Counties, and Sonoma and Solano Counties to the north. The Pacific coast and the northern valleys are primarily in agricultural and open space use, while the

<sup>&</sup>lt;sup>1</sup> ABAG serves as the regional Census Data Center and publishes its own forecasts. Detailed information on current and future population, employment, and housing are available at the census tract level. ABAG's biennial Projections series provides long-term forecasts through a series of computer models that have been recognized in academic literature and are described in detail on ABAG's website. ABAG's demographic and land use forecasts are widely used by transportation and air quality agencies, local government, and private industry.

<sup>&</sup>lt;sup>2</sup> Census 2000.

agricultural areas adjoining the Central Valley have seen substantial suburban development in recent years, particularly in Solano County and eastern Contra Costa County.

#### Extent of Urban Development

The Bay Area is comprised of nine counties, including Alameda, Contra Costa, Marin, Napa, San Francisco, San Mateo, Santa Clara, Solano, and Sonoma. According to ABAG, only about 18 percent of the region's approximately 7,000 square miles was developed in 2005.<sup>3</sup> The remaining undeveloped area includes open space and agricultural lands as well as water bodies (excluding the San Francisco Bay) and parks. The amount of land developed in each of the nine counties varies from a low of five percent in Napa County to a high of 51 percent in San Francisco. Residential uses continue to consume the greatest amount of urban land, 72 percent, while employment related land uses occupy about 28 percent.<sup>4</sup> State highways, local roads, sidewalks, and parking typically consume about 20 percent of the land in each category, and accordingly, about 20 percent of the developed land in the Bay Area.

The Bay Area includes 101 cities, with San Jose, San Francisco, and Oakland representing the largest urbanized centers. Other major urban centers have formed throughout the region leading to the overall urbanization as illustrated in Figure 2.3-1.

<sup>&</sup>lt;sup>3</sup> Association of Bay Area Governments, 2007.

<sup>&</sup>lt;sup>4</sup> Ibid.

Part Two: Settings, Impacts, and Mitigation Measures Chapter 2.3: Land Use and Housing

Figure 2.3-1: Urbanized Land and Open Space

#### **Density of Development**

Residential and employment densities vary widely within the region, with the highest densities associated with the older areas. Densities are of interest because of the way that they affect transportation options for Bay Area residents. In general, low density development is more dispersed and requires greater reliance on autos for many trips, while higher residential densities (on the order of 7.0 to 30.0 units/acre) can sustain significant transit service.<sup>5</sup> A density of 8.0 units/acre is typically the minimum density required to justify economically a fixed bus system operating at half-hour headways.<sup>6</sup>

Average densities are shown for the MTC superdistricts in Table 2.3-1<sup>7</sup> and for counties in Table 2.3-2. The Bay Area averages for residential and employment density are just over 4 units per residential acre and 15 jobs per commercial or industrial acre. The highest residential and employment densities occur in downtown San Francisco (which includes the North Beach and Chinatown neighborhoods) with 127 households per residential acre and 238 jobs per commercial or industrial acre.

With respect to residential uses, after San Francisco, the Berkeley/Albany, Daly City/San Bruno, and Sunnyvale/Mountain View areas have the highest densities, while Healdsburg/Cloverdale, St. Helena/Calistoga, Santa Rosa/Sebastopol, and Petaluma/Sonoma have the lowest densities. Areas with the highest employment densities include San Francisco, Berkeley/Albany, and Walnut Creek/Lamorinda. Areas with the lowest employment densities include Healdsburg/Cloverdale, Antioch/Pittsburg, and Fairfield/Vacaville.

At the county level, with the exception of San Francisco County, the highest employment densities occur in Santa Clara and Marin counties, while the highest residential densities occur in Alameda and Santa Clara counties. The lowest residential densities can be found in Sonoma County; the lowest employment densities in Solano County. Figure 2.3-2 illustrates 2005 population density in the region by traffic analysis zone.

<sup>&</sup>lt;sup>5</sup> Pushkarev, and Zupan, 1977.

<sup>&</sup>lt;sup>6</sup> Cervero, 1986.

<sup>&</sup>lt;sup>7</sup> MTC divides the Bay Area into 34 superdistricts. These superdistricts are comprised of 1,454 transportation analysis zones (TAZs) used as areas of aggregation for describing Bay Area population and employment levels, and for analysis, calibration, and presentation of MTC's transportation model (BAYCAST-90) output.

## Part Two: Settings, Impacts, and Mitigation Measures

## Chapter 2.3: Land Use and Housing

		En	ployment Densit	у	Residential Density					
	Superdistrict	labs	Commercial/ Jobs Industrial Acres Density			Residential Acres Density				
	Downtown San Francisco	331,397	1,395	237.6	70,716	556	127.2			
2	Richmond District	81,436	969	84.0	104,679	2,301	45.5			
3	Mission District	114,322	3,066	37.3	113,963	4,111	27.7			
4	Sunset District	25,924	435	59.6	49,563	2,565	19.3			
5	Daly City/San Bruno	137,063	8,550	16.0	98,262	10,088	9.7			
6	San Mateo/Burlingame	85,902	4,943	17.4	83,039	17,192	4.8			
7	Redwood City/Menlo Park	114,381	9,641	11.9	78,769	35,125	2.2			
8	Palo Alto/Los Altos	125,826	4,400	28.6	70,792	18,237	3.9			
9	Sunnyvale/Mountain View	302,932	16,908	17.9	93,004	11,265	8.3			
10	Saratoga/Cupertino	116,455	5,235	22.2	119,569	28,670	4.2			
11	Central San Jose	138,295	5,706	24.2	100,770	12,780	7.9			
12	Milpitas/East San Jose	102,208	6,355	16.1	105,457	19,473	5.4			
13	South San Jose/Almaden	44,352	3,131	14.2	73,394	15,196	4.8			
14	Gilroy/Morgan Hill	42,798	2,957	14.5	32,713	14,392	2.3			
15	Livermore/Pleasanton	127,840	9,100	14.0	68,303	22,858	3.0			
16	Fremont/Union City	133,758	10,312	13.0	102,646	19,338	5.3			
17	Hayward/San Leandro	136,717	12,117	11.3	125,987	21,874	5.8			
18	Oakland/Alameda	222,831	13,744	16.2	176,468	18,833	9.4			
19	Berkeley/Albany	109,128	3,413	32.0	70,384	5,911	11.9			
20	Richmond/El Cerrito	69,623	8,307	8.4	89,129	12,077	7.4			
21	Concord/Martinez	110,755	12,380	8.9	86,481	16,143	5.4			
22	Walnut Creek/Lamorinda	85,095	2,725	31.2	60,396	19,585	3.			
23	Danville/San Ramon	60,654	2,273	26.7	45,075	17,493	2.0			
24	Antioch/Pittsburg	52,916	10,028	5.3	87,229	19,206	4.			
25	Vallejo/Benicia	50,908	6,607	7.7	53,002	7,969	6.			
26	Fairfield/Vacaville	99,620	18,550	5.4	89,038	37,393	2.			
27	Napa	45,080	2,599	17.3	34,774	8,581	4.			
28	St. Helena/Calistoga	25,615	2,181	11.7	14,496	10,440	١.			
29	Petaluma/Sonoma	76,360	11,045	6.9	62,714	39,443	١.			
30	Santa Rosa/Sebastopol	116,542	9,518	12.2	87,157	59,362	Ι.			
31	Healdsburg/Cloverdale	27,560	11,795	2.3	31,929	47,530	0.			
32	Novato	27,810	2,414	11.5	22,566	7,041	3			
33	San Rafael	59,091		13.7	42,243	14,656	2			
34	Mill Valley/Sausalito	48,569	1,920	25.3	38,371	9,195	4.			

## Table 2.3-1: Density of Development in the Bay Area by MTC Superdistrict, 2005

Source: MTC's Superdistrict and County Summaries of ABAG's Projections 2007 2000-2035 Data Summary, 2007

	E	mployment Density	Residential Density				
County	Jobs	Commercial/ Industrial Acres Density		Households	Residential Acres	Density	
San Francisco	553,079	5,865	94.3	338,921	9,533	35.6	
San Mateo	337,346	23,134	14.6	260,070	62,405	4.2	
Santa Clara	872,866	44,692	19.5	595,699	120,013	5.0	
Alameda	730,274	48,686	15.0	543,788	88,814	6.1	
Contra Costa	379,043	35,713	10.6	368,310	84,504	4.4	
Solano	150,528	25,157	6.0	142,040	45,362	3.1	
Napa	70,695	4,780	14.8	49,270	19,021	2.6	
Sonoma	220,462	32,358	6.8	181,800	146,335	1.2	
Marin	135,470	8,654	15.7	103,180	30,892	3.3	
Bay Area	3,449,763	229,039	15.1	2,583,078	606,879	4.3	

Table 2.3-2: Density of Development in the Bay Area by County, 2005

Source: MTC's Superdistrict and County Summaries of ABAG's Projections 2007 2000-2035 Data Summary, 2007

#### Land Use and Future Densities

The amount of developed land in the region is forecast to increase by over 90,000 acres between 2005 and 2035, an increase of 2 percent.<sup>8</sup> This regional development will result in just over 20 percent of all Bay Area land being developed by 2035. Overall regional population density has been consistent from 2000 to 2005, but it is projected to increase marginally over the next 25 years, from 12 to about 13 persons per residential acre. Projected population density for year 2035 is illustrated in Figure 2.3-3. Similarly, the regional household density is projected to go from about 4 households per acre in 2005 to 5 households per acre by 2035. The relatively small increases in residential density are the result of increases in residential acres in urban and urban core areas (as a percent of all acres) as well as increases in population in urban and urban core areas, both absolutely and as a share of regional population. This infill development within the established cities can contribute to greater transit use in corridors where transit is successful. Table 2.3-3 summarizes this information.

<sup>&</sup>lt;sup>8</sup> Association of Bay Area Governments, 2007.

Part Two: Settings, Impacts, and Mitigation Measures Chapter 2.3: Land Use and Housing

Figure 2.3-2 Existing Population Density (2005)

## Transportation 2035 Plan Draft Environmental Impact Report

Figure 2.3-3 Projected Population Density (2035)

## Part Two: Settings, Impacts, and Mitigation Measures

Chapter 2.3: Land Use and Housing

Land Use Characteristics	2000	2005	2015	2025	2035
Population	6,783,762	7,096,099	7,729,998	8,389,600	9,031,498
Households	2,466,015	2,583,078	2,818,761	3,059,073	3,292,521
Residential Acres	586,879	606,879	639,913	662,657	681,512
Commercial-Industrial Acres	229,039	229,039	236,082	241,597	244,797
Developed Acres (Residential, Commercial-Industrial)	815,918	835,918	875,995	904,254	926,309
Total Acres	4,575,237	4,575,237	4,575,237	4,575,237	4,575,237
Population/Residential Acre	12	12	12	13	13
Households/Residential Acre	4	4	4	5	5
Population/Household	2.693	2.691	2.688	2.691	2.695
Percentage of Total Acres Developed	17.8%	18.3%	19.1%	19.8%	20.2%

Table 2.3-3: Bay Area Land Use Characteristics and Projections, 2000-2035

Source: MTC's Superdistrict and County Summaries of ABAG's Projections 2007 2000-2035 Data Summary, 2007

## Agricultural Land

### Current and Historical Agricultural Uses

The Bay Area has a significant amount of land in agricultural uses. In 2006, just over half of the region's approximately 4.5 million acres were classified as agricultural land.<sup>9</sup> Of these 2.4 million acres of agricultural land, over 70 percent (about 1.7 million acres) are used for grazing. Products grown in the Bay Area include field crops, fruit and nut crops, seed crops, vegetable crops and nursery products. Field crops, which include corn, wheat, and oats, as well as pasture lands, represent approximately 63 percent of Bay Area agricultural land.<sup>10</sup>

Table 2.3-4 shows the acres of agricultural lands, by farmland type, for each county in the region, excluding San Francisco County. Figure 2.3-4 shows the location of these agricultural lands within the region. The classification of agricultural lands is based primarily on soils and climate, though Prime Farmland, Farmland of Statewide Importance, and Unique Farmland must have been used for agricultural production at some time during the previous four years. For more information about farmland classification, see the *Regulatory Setting* in this chapter.

Over the last 50 years, a large amount of agricultural land has been converted to urban uses in the Bay Area. According to the U.S. Census of Agriculture, the region had over 3 million acres of Land in Farms in 1954. By 2002 (the most recent year for which data is available), Land in Farms, which includes pasture lands, had decreased by 32 percent, almost a million fewer acres than 1954.<sup>11</sup> During this same period, Cropland Harvested decreased by 44 percent. Irrigated Land, however, increased by 7 percent, due to very large increases in Napa and Sonoma counties, primarily due to vineyard planting. Table 2.3-5 shows historical agricultural land data for the region's nine counties.

<sup>&</sup>lt;sup>9</sup> California Department of Conservation, 2006.

<sup>&</sup>lt;sup>10</sup> County Crop Reports, 2006.

<sup>&</sup>lt;sup>11</sup> U.S. Department of Agriculture, 1978, 2002.

	Alameda	Contra Costa	Marin	Napa	San Mateo	Santa Clara	Solano	Sonoma	Region
Prime Farmland <sup>b</sup>	4,725	29,938	7	31,999	2,356	20,766	139,536	33,803	263,130
Farmland of Statewide Importance <sup>c</sup>	1,391	8,092	459	9,679	186	4,460	7,164	18,624	50,055
Unique Farmland <sup>d</sup>	2,323	3,589	303	16,358	2,387	2,452	11,036	33,300	71,748
Farmland of Local Importance <sup>®</sup>	0	52,071	65,602	18,991	3,496	6,113	0	76,384	222,657
Important Farmland Subtotal	8,439	93,690	66,371	77,027	8,425	33,791	157,736	162,111	607,590
Grazing Land <sup>f</sup>	244,947	168,662	89,514	179,299	46,292	388,510	202,826	420,323	1,740,373
Agricultural Land Total	253,386	262,352	155,885	256,326	54,717	422,301	360,562	582,434	2,347,963

#### Table 2.3-4: Bay Area Agricultural Lands

<sup>a</sup> Agricultural land use for Sonoma County uses data from year 2004. Data for year 2006 was not available.

<sup>b</sup> Farmland with the best combination of physical and chemical features able to sustain long term agricultural production. This land has the soil quality, growing season, and moisture supply needed to produce sustained high yields.

<sup>c</sup> Similar to Prime Farmland but with minor shortcomings, such as greater slopes or less ability to store moisture.

<sup>d</sup> Farmland of lesser quality soils used for the production of the state's leading agricultural crops. This land is usually irrigated, but may include nonirrigated orchards or vineyards.

<sup>e</sup> Important to the local agricultural economy as determined by county's board of supervisors and local advisory committee. <sup>(</sup>Land on which the existing vegetation is suited to the grazing of livestock.

Source: California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program, 2006

		1954			2002	Percent Change 1954-2002			
	Cropland Harvested	Land in Farms	Irrigated Land in Farms	Cropland Harvested	Land in farms	Irrigated Land®	Cropland Harvested	Land in farms	Land in Irrigated Farms
Alameda	59,548	316,994	22,599	7,926	218,094	6,185	-87%	-31%	-73%
Contra Costa	85,807	324,856	50,117	26,018	126,338	32,921	-70%	-61%	-34%
Marin	12,133	236,956	974	5,706	150,645	1,856	-53%	-36%	91%
Napa	52,168	311,907	8,390	52,838	237,548	52,874	۱%	-24%	530%
San Francisco	88	307	n/a	n/a	n/a	7	-100%	-100%	n/a
San Mateo	24,194	84,247	6,623	6,273	41,530	4,849	-74%	-51%	-27%
Santa Clara	148,056	590,041	114,677	22,764	320,851	24,659	-85%	-46%	-78%
Solano	135,071	423,423	79,971	131,408	351,453	124,535	-3%	-17%	56%
Sonoma	98,053	761,832	20,231	91,537	627,227	75,901	-7%	-18%	275%
Region	615,118	3,050,563	303,582	344,470	2,073,686	323,787	-44%	-32%	7%

#### Table 2.3-5: Bay Area Agricultural Lands, 1954 and 2002

Source: U.S. Census of Agriculture, 1978, 2002

Part Two: Settings, Impacts, and Mitigation Measures Chapter 2.3: Land Use and Housing

Figure 2.3-4: Farmlands

### Williamson Act Lands

In 1965, the State Legislature passed the California Land Conservation Act (better known as the Williamson Act) in response to agricultural property tax burdens resulting from rapid land value appreciation. Rapidly rising property taxes, resulting from nearby urbanization, made agricultural uses increasingly less economically viable. The Act allows local governments to assess agricultural land based on the income-producing value of the property, rather than the "highest and best use" value, which had previously been the rule. The Legislature intended that the Act help farmers by providing property tax relief, and by discouraging the unnecessary and premature conversion of agricultural land to non-agricultural uses.

Agricultural land under Williamson Act contract includes both "prime" and "nonprime" lands. The California Land Conservation Acts defines prime agricultural land as: 1) USDA Class I or II soils; 2) Storie Index soil rating 80 to 100; 3) land that has returned a predetermined annual gross value for three of the past five years; 4) livestock-supporting land with a carrying capacity of at least one animal unit per acre; or 5) land planted with fruit or nut trees, vines, bushes or crops that have a non-bearing period of less than five years and that will normally return a predetermined annual gross value per acre per year during the commercial bearing period (Government Code Section 51200-51207). Nonprime lands include pasture and grazing lands and other non-irrigated agricultural land with lesser quality soils. Prime agricultural lands under the Williamson Act are defined differently from Prime Farmland under the Department of Conservation.

In 2007, over 1.2 million acres of land were under Williamson Act contract in the Bay Area. Of this, about 208,000 acres were prime farmland and 1.03 million acres were nonprime.<sup>12</sup> Lands under Williamson Act contract, therefore, are primarily used for pasture and grazing and not for the cultivation of crops. Nearly 70 percent of prime and nonprime lands under contract are in Santa Clara, Solano, and Sonoma counties. Table 2.3-6 shows the land under Williamson Act contract in the Bay Area.

As a general rule, land can be withdrawn from Williamson Act contract only through the nineyear nonrenewal process. Immediate termination via cancellation is reserved for "extraordinary," unforeseen situations (See Sierra Club v. City of Hayward (1961) 28 Cal.3d 840, 852-855). Furthermore, it has been held that "cancellation is inconsistent with the purposes of the (Williamson) act if the objectives to be served by cancellation should have been predicted and served by nonrenewal at an earlier time, or if such objectives can be served by nonrenewal now" (Sierra Club v. City of Hayward). Given the extended phasing and time periods involved in some of the Transportation 2035 projects, it appears potentially feasible to utilize the nonrenewal process if contract termination is necessary for implementation of the Plan.

<sup>&</sup>lt;sup>12</sup> California Department of Conservation, 2007.

### Part Two: Settings, Impacts, and Mitigation Measures Chapter 2.3: Land Use and Housing

	Prime	Nonprime	Total	Percent
Alameda	2,459	133,066	135,525	11%
Contra Costa	9,559	37,749	47,308	4%
Marin	1,636	84,951	86,587	7%
Napa	18,294	51,884	70,178	6%
San Mateoª	3,070	43,988	47,058	4%
Santa Clara	10,316	302,322	312,638	25%
Solano	120,156	148,689	268,845	22%
Sonoma	42,321	230,937	273,258	22%
Cities	149	701	850	0%
Region	207,960	1,034,286	1,242,246	100%

Table 2-3.6 Williamson Act Contracts in the Bay Area <sup>1</sup> , 20
------------------------------------------------------------------------

totals include a small amount of non-Williamson Act land with other kinds of restrictive covenants.

<sup>a</sup> Acreage enrolled for San Mateo is from 2006.

Source: California Department of Conservation, 2007

### **Existing and Future Housing Stock**

The Bay Area has experienced a 34 percent increase in the number of occupied housing units from 1980 to 2008.13 (Table 2.3-7). In 2008, Santa Clara and Alameda counties had the highest number of occupied housing units in the Bay Area with 609,000 and 554,000 units, respectively. Napa County had the lowest number with 50,600 units. Between 2005 and 2035, the number of occupied housing units is expected to increase by 22 percent. Santa Clara and Alameda counties will continue to have the highest proportion of occupied housing units in the region with 24 and 21 percent, respectively, and Napa County the lowest with 2 percent. According to ABAG Projections 2007, the distribution of housing stock across the region's nine counties in 2035 will be roughly equivalent to the distribution in 2005.

In 2008, four of nine Bay Area counties had lower average household sizes than they did in 1980 (Marin, Napa, San Francisco, and Sonoma). Table 2.3-8 shows that household size overall is expected to stay relatively constant over the next 20 years, at 2.69 persons per household average for the Bay Area.

<sup>&</sup>lt;sup>13</sup> Department of Finance, 2008a; Census, 1980.

Chapter 2.3: Land Use and Housing

	DOF	Census					ABAG Projections 2007	tions 2007				
	2008	1980	2005	2010	2015	2020	2025	2030	2035	Growth: 2005- 2035	% of Total Occ Units in 2005	% of Total Occ Units 2035
County									000 001	10, 201	910	/o1c
Alameda	553,501	426,092	543,788	564,852	589,722	614,757	642,997	671,700	/00,087	105,961	Ø 17	% I 7
Contra Costa	385.733	241.534	368,310	385,400	405,420	425,480	446,590	466,430	485,240	116,930	4%	15%
Marin	104.113	88,723	103,180	105,340	107,930	110,490	112,810	114,970	116,800	13,620	4%	4%
Nana	50.588	36,624	49,270	51,470	53,650	55,740	57,210	58,640	59,650	10,380	2%	2%
San Francisco	344.792	298,956	338,921	348,334	357,806	367,432	377,050	386,682	396,309	57,388	13%	12%
San Mareo	263.252	225.201	260,070	267,230	277,090	287,470	296,870	304,660	312,030	51,960	10%	%6
Santa Clam	408.657	458.519	595.699	628,773	664,793	701,400	732,806	769,737	806,203	210,504	23%	24%
Salano	146.191	80.426	142,040	152,400	162,620	172,050	180,360	188,290	196,220	54,180	5%	%9
Sonoma	186.568	114,474	181,800	192,660	199,730	206,840	212,380	216,320	219,980	38,180	<u>7%</u>	2%
Region 2,643,390 1,970,549 2,583,078 2,696,459 2,818,761 2,941,659 3,059,073 3,177,429 3,292,521 709,44	2,643,390	1,970,549	1,970,549 2,583,078	2,696,459	2,818,761	2,941,659	3,059,073	3,177,429	3,292,521	709,443	100%	%001

Table 2.3-7: Occupied Housing Units in the Bay Area (1980-2035)

2.3-14

# Part Two: Settings, Impacts, and Mitigation Measures Chapter 2.3: Land Use and Housing

	DOF	Census			ABAG P	ABAG Projections 2007	07		
County	2008	1980	2005	2010	2015	2020	2025	2030	2035
Alameda	2.74	2.55	2.72	2.73	2.72	2.71	2.71	2.72	2.72
Contra Costa	2.70	2.19	2.75	2.73	2.70	2.69	2.68	2.67	2.66
Marin	2.37	2.56	2.34	2.34	2.34	2.34	2.33	2.32	2.32
Napa	2.59	2.76	2.61	2.60	2.59	2.56	2.54	2.52	2.51
San Francisco	2.33	2.53	2.29	2.26	2.24	2.27	2.30	2.33	2.36
San Mateo	2.77	2.69	2.74	2.73	2.74	2.74	2.73	2.72	2.72
Santa Clara	2.97	2.43	2.91	2.92	2.92	2.93	2.93	2.92	2.91
Solano	2.81	2.58	2.85	2.88	2.90	2.90	2.90	2.90	2.90
Sonoma	2.53	2.82	2.57	2.58	2.56	2.53	2.53	2.53	2.53
Region	2.64	2.57	2.69	2.69	2.69	2.69	2.69	2.69	2.69

# Table 2.3-8: Average Household Size in the Bay Area (1980-2035)

Į. o(a)o 4 5 Source: Department of I Data Summary, 2007

Chapter 2.3: Land Use and Housing

### **REGULATORY SETTING**

The regulatory setting includes federal and State agencies and laws, local regulatory bodies, and local control mechanisms guiding agricultural, land use, and transportation decisions.

### **Federal Regulations**

### U.S. Department of Agriculture (USDA), Natural Resources Conservation Service (NRCS)

The U.S. Department of Agriculture's (USDA) Natural Resources Conservation Service (NRCS) maps soils and farmland uses to provide comprehensive information necessary for understanding, managing, conserving and sustaining the nation's limited soil resources. In addition to many other natural resource conservation programs, the NRCS manages the Farmland Protection Program, which provides funds to help purchase development rights to keep productive farmland in agricultural uses. Working through existing programs, USDA joins with state, tribal, or local governments to acquire conservation easements or other interests from landowners.

### Federal Farmland Protection Policy Act

The U.S. Department of Agriculture's (USDA's) Natural Resources Conservation Service (NRCS) oversees the Farmland Protection Policy Act (FPPA) (7 U.S. Code [USC] Section 4201 et seq.; see also 7 Code of Federal Regulations [CFR] 658). The FPPA (a subtitle of the 1981 Farm Bill) is national legislation designed to protect farmland. The FPPA states its purpose is to "minimize the extent to which federal programs contribute to the unnecessary conversion of farmland to nonagricultural uses." The FPPA applies to projects and programs that are sponsored or financed in whole or in part by the federal government. The FPPA does not apply to private construction projects subject to federal permitting and licensing, projects planned and completed without assistance from a federal agency, federal programs to the extent practical are compatible with state, local, and private programs and policies to protect farmland and calls for the use of the Land Evaluation and Site Assessment (LESA) system to aid in analysis. Because MTC or its project sponsors may ultimately seek some federal funding for transportation improvements, the FPPA is considered in this document.

### Department of Housing and Urban Development (HUD)

The Department of Housing and Urban Development (HUD) is the federal agency responsible for national policy and programs that address housing needs in the U.S. HUD aims to improve and develop the Nation's communities and enforce fair housing laws. HUD plays a major role in supporting homeownership by underwriting homeownership for lower- and moderate-income families through its mortgage insurance programs.

### **State Regulations**

### **Coastal Commission**

The Coastal Commission is one of California's two designated coastal management agencies that administer the federal Coastal Zone Management Act (CZMA) in California. In partnership with coastal cities and counties, it plans and regulates the use of land and water in the coastal zone.

Chapter 2.3: Land Use and Housing

Development activities, which are broadly defined by the CZMA to include (among others) construction of buildings, divisions of land, and activities that change the intensity of use of land or public access to coastal waters, generally require a coastal permit from either the Coastal Commission or the local government. CZMA gives State coastal management agencies regulatory control over all activities that may affect coastal resources including any new development, and highway improvement projects that use federal funds. The coastal zone, which was specifically mapped by the Legislature, covers an area larger than the State of Rhode Island. On land the coastal zone varies in width from several hundred feet in highly urbanized areas up to five miles in certain rural areas, and offshore the coastal zone includes a three-mile-wide band of ocean. The coastal zone established by the Coastal Act does not include San Francisco Bay, where development is regulated by the Bay Conservation and Development Commission (BCDC).

### Bay Conservation and Development Commission (BCDC)

As the other designated coastal zone management agency, and pursuant to the McAteer-Petris Act, BCDC is designated as the agency responsible for the protection of the Bay and its natural resources and for the regulation of the development of the Bay and shoreline to their highest potential with a minimum of Bay fill. BCDC has jurisdiction over fill placement, materials extraction, and changes in the use of any land, water, or structure. For development projects, including transportation improvements, BCDC jurisdiction includes the Bay itself (including San Pablo and Suisun Bays, sloughs, and certain creeks) and, in general, a 100-foot band along the Bay shoreline.

### California Farmland Conservancy Program

The California Farmland Conservancy Program (Public Resources Code Section 10200 et seq.) supports the voluntary granting of agricultural conservation easements from landowners to qualified nonprofit organizations, such as land trusts, as well as local governments. Conservation easements are voluntarily established restrictions that are permanently attached to property deeds, with the general purpose of retaining land in its natural, open-space, agricultural, or other condition while preventing uses that are deemed inconsistent with the specific conservation purposes expressed in the easements. Agricultural conservation easements define conservation purposes that are tied to keeping land available for continued use as farmland. Such farmlands remain in private ownership, and the landowner retains all farmland use authority, but the farmland is restricted in its ability to be subdivided or used for nonagricultural purposes, such as urban uses. Potential impacts on conservation easements would be addressed in subsequent project-level documents.

### Department of Housing and Community Development (HCD)

In response to state population and household growth, and to ensure the availability of affordable housing for all income groups, the State Department of Housing and Community Development (HCD) is responsible for determining the regional housing need for all jurisdictions in California.

### Williamson Act and Farmland Security Zone Contracts

The California Land Conservation Act (Government Code Section 51200 et seq.) of 1965, commonly known as the Williamson Act, provides a tax incentive for the voluntary enrollment of agricultural and open space lands in contracts between local government and landowners. The contract enforceably restricts the land to agricultural and open space uses and compatible uses defined in state law and local ordinances. An agricultural preserve, which is established by local

government, defines the boundary of an area within which a city or county will enter into contracts with landowners. Local governments calculate the property tax assessment based on the actual use of the land instead of the potential land value assuming full development.

Williamson Act contracts are for 10 years and longer. The contract is automatically renewed each year, maintaining a constant, 10-year contract, unless the landowner or local government files to initiate nonrenewal. Should that occur, the Williamson Act would terminate 10 years after the filing of a notice of nonrenewal. Only a landowner can petition for a contract cancellation. Tentative contract cancellations can be approved only after a local government makes specific findings and determines the cancellation fee to be paid by the landowner.

The State of California has the following policies regarding public acquisition of and locating public improvements on lands in agricultural preserves and on lands under Williamson Act contracts (Government Code Section 51290–51295):

- State policy is to avoid locating federal, state, or local public improvements and improvements of public utilities, and the acquisition of land, in agricultural preserves.
- State policy is to locate public improvements that are in agricultural preserves on land other than land under Williamson Act contract.
- State policy is that any agency or entity proposing to locate such an improvement, in considering the relative costs of parcels of land and the development of improvements, give consideration to the value to the public of land, particularly prime agricultural land, in an agricultural preserve.

Since 1998, another option in the Williamson Act Program has been established with the creation of Farmland Security Zone contracts. A Farmland Security Zone is an area created within an agricultural preserve by a board of supervisors upon the request of a landowner or group of landowners. Farmland Security Zone contracts offer landowners greater property tax reduction and have a minimum initial term of 20 years. Like Williamson Act contracts, Farmland Security Zone contracts renew annually unless a notice of nonrenewal is filed. Potential cancellation of Williamson Act and Farmland Security Zone contracts would be addressed in subsequent project-level documents.

### Farmland Mapping and Monitoring Program

The Farmland Mapping and Monitoring Program (FMMP) is the only statewide land use inventory conducted on a regular basis. The California Department of Conservation administers the FMMP, under which it maintains an automated map and database system to record changes in the use of agricultural lands. Farmland under the FMMP is listed by category—Prime Farmland, Farmland of Statewide Importance, Unique Farmland, and Farmland of Local Importance. The farmland categories listed under the FMMP are described below. The categories are defined pursuant to USDA land inventory and monitoring criteria, as modified for California.

### Prime Farmland

Prime Farmland is land with the best combination of physical and chemical features to sustain long-term production of agricultural crops. These lands have the soil quality, growing season, and moisture supply necessary to produce sustained high yields. Soil must meet the physical and

Chapter 2.3: Land Use and Housing

chemical criteria determined by the NCRS. Prime Farmland must have been used for production of irrigated crops at some time during the 4 years prior to the mapping date by the FMMP.

### Farmland of Statewide Importance

Farmland of Statewide Importance is similar to Prime Farmland but with minor differences, such as greater slopes or a lesser ability of the soil to store moisture. Farmland of Statewide Importance must have been used for production of irrigated crops at some time during the 4 years prior to the mapping date.

### Unique Farmland

Unique Farmland has lesser quality soils than Prime Farmland or Farmland of Statewide Importance.

Unique Farmland is used for the production of the state's leading agricultural crops. These lands are usually irrigated but may include nonirrigated orchards or vineyards found in some climatic zones in California. Unique Farmland must have been used for crops at some time during the 4 years prior to the mapping date.

### Farmland of Local Importance

Farmland of Local Importance is farmland that is important to the local agricultural community as determined by each county's board of supervisors and local advisory committees.

### **Regional/Local Regulations**

### Association of Bay Area Governments (ABAG)

Through its role as the Bay Area's council of governments (COG), ABAG has been designated by the State and federal governments as the official comprehensive planning agency for the Bay Area. ABAG reviews projects of regional significance for consistency with regional plans and is also responsible for preparation of the Regional Housing Needs Assessment (RHNA), pursuant to California Government Code Section 65584(a). ABAG's locally adopted Regional Housing Needs Allocation (2007-2014)(approved by the ABAG Board May 15, 2008), along with the San Francisco Bay Area Housing Needs Plan, 2007-2014 (released June 5, 2008) provide a policy guide for planning the region's housing, economic development, environmental quality, transportation, recreation, and health and safety.

### FOCUS

ABAG, along with the Bay Area Air Quality Management District, the Bay Conservation and Development Commission, and MTC, initiated an incentive-based strategy called FOCUS in 2007. While FOCUS is not part of the regional regulatory framework, it is important to reference here because it represents a significant step forward in integrating land use and transportation policies and investments. The primary mission of FOCUS is to work with local and regional entities to encourage more housing adjacent to transit in existing communities and to conserve regionally significant resource areas. FOCUS, which includes the identification of Priority Development Areas (PDAs) and Priority Conservation Areas (PCAs), is supported in part by a Regional Blueprint Planning Grant from the State of California. Local governments volunteer to designate areas of their communities as PDAs. Designated PDAs are then eligible for capital infrastructure

funds, planning grants, and technical assistance to support housing and transit-oriented developments. In addition, the purpose of identifying PCAs as part of FOCUS is to highlight nearterm opportunities for land conservation in the Bay Area that have consensus for protection. Highlighting these areas as part of a regional planning program is intended to help inform the distribution of public funds and leverage private funds and new partnerships to invest in these areas. Figure 2.3-5 depicts the FOCUS Priority Development Areas, and Figure 2.3-6 depicts the FOCUS Priority Conservation Areas.

### Part Two: Settings, Impacts, and Mitigation Measures Chapter 2.3: Land Use and Housing

Figure 2.3-5: Focus Priority Development Areas

.

4

Figure 2.3-6: Focus Priority Conservation Areas

Chapter 2.3: Land Use and Housing

### Local Agency Formation Commissions

Under State law, each county must have a local agency formation commission (LAFCO), which is the agency that has the responsibility to create orderly local government boundaries, with the goals of encouraging the orderly formation of local governmental agencies and the preservation of open space lands, and discouraging urban sprawl (California Association of Local Agency Formation Commissions website). While LAFCOs have no direct land use power, their actions determine which local government will be responsible for planning new areas. LAFCOs address a wide range of boundary actions, including creation of spheres of influences for cities, adjustments to boundaries of special districts, annexations, incorporations, detachments of areas from cities, and dissolutions of cities.

### Metropolitan Transportation Commission's TOD Policy

MTC adopted a TOD Policy in 2005 to support the development of communities around new transit lines and stations identified as part of the Resolution 3434 Regional Transit Expansion Program. The regional policy is designed to address multiple goals: improving the cost effective-ness of regional investments in new transit expansions, easing the Bay Area's chronic housing shortage, creating vibrant new communities, and helping preserve regional open space. The TOD Policy establishes corridor-level thresholds to quantify appropriate minimum levels of development around transit stations along new corridors. MTC requires that local jurisdictions with a project seeking funding through Resolution 3434 must adopt a Station Area Plan that demonstrates how the jurisdiction plans to meet the housing threshold. In essence, the discretionary funding available for Resolution 3434 transit expansion projects is conditioned on a local demonstration that plans are in place and will be implemented to support adequate housing densities around those transit stations and corridors.

### **Local Control Mechanisms**

### **General Plans**

The most comprehensive land use planning for the San Francisco Bay Area region is provided by city and county general plans, which local governments are required by State law to prepare as a guide for future development. The general plan contains goals and policies concerning topics that are mandated by State law or which the jurisdiction has chosen to include. Required topics are: land use, circulation, housing, conservation, open space, noise, and safety. Other topics that local governments frequently choose to address are: public facilities, parks and recreation, community design, and/or growth management. City and county general plans must be consistent with each other. County general plans must cover areas not included by city general plans (i.e., unincorporated areas).

### **Specific and Master Plans**

A city or county may also provide land use planning by developing community or specific plans for smaller, more specific areas within their jurisdiction. These more localized plans provide for focused guidance for developing a specific area, with development standards tailored to the area, as well as systematic implementation of the general plan.

### Zoning

The city or county zoning code is the set of detailed requirements that implement the general plan policies at the level of the individual parcel. The zoning code presents standards for different uses and identifies which uses are allowed in the various zoning districts of the jurisdiction. Since 1971, State law has required the city or county zoning code to be consistent with the jurisdiction's general plan.

### **Growth Control**

Local growth control endeavors to manage community growth by various methods, including tying development to infrastructure capacity or traffic level of service standards, limiting the number of new housing units, setting limits on the increase of commercial square footage, linking development to a jobs-housing balance, and the adoption of urban growth boundaries. These goals and others can be achieved through the adoption of a countywide Growth Management Program (GMP). Growth Management programs, including urban growth boundaries, have been implemented by county government and/or cities in all of the nine Bay Area counties.

### Public Ownership, Purchase of Development Rights, and Open Space Acquisition

Local governments and special districts, either on their own or working with land trusts and conservancies, can acquire fee title to agricultural and open space lands or purchase development rights to preserve rural and agricultural areas, watersheds, or critical habitat, or to create public parks and recreational areas. Such actions have been undertaken in all Bay Area counties and have had significant effects on the shape of cities and urban form in the region.

### **IMPACT ANALYSIS**

The land use impact analysis assesses the potential for significant adverse impacts related to conversion or loss of important agricultural lands and open space; community displacement and disruptions, including potential loss of housing and businesses and separation of people from community resources; and project consistency with adopted land use plans.

### SIGNIFICANCE CRITERIA

Implementation of the Transportation 2035 Plan would have a potentially significant adverse impact if Plan projects would:

- **Criterion 1:** Convert substantial amounts of important agricultural lands and open space (Prime Farmland, Unique Farmland, or Farmland of Statewide Importance) to non-agricultural use. Such conversion from agricultural use would be significant whether or not the proposed facility is consistent with local or regional plans.
- **Criterion 2:** Conflict substantially with the land use portion of adopted local general plans or other applicable land use plans, including specific plans, existing zoning, or Williamson Act contracts. A potentially significant impact would also be identified if transportation projects would substantially influence future land use patterns and development contrary to adopted plans.

Part Two: Settings, Impacts, and Mitigation Measures Chapter 2.3: Land Use and Housing

- **Criterion 3:** Result in residential or business disruption or displacement of substantial numbers of existing population and housing.
- **Criterion 4:** Result in permanent alterations to the characteristics and qualities of an existing neighborhood or community by separating residences from community facilities and services, restricting access to commercial or residential areas, or eliminating community amenities.

### **METHOD OF ANALYSIS**

The land use analysis starts by narrowing down the list of projects to those that have the potential for physical impacts based on characteristics such as expansion, widening, new construction or new configurations (about 141 projects in all). Next, the analysis quantifies impacts by county to provide an understanding of: 1) the general amount and type of land that might be impacted; and 2) where impacts may be concentrated. Because there are no details about right-of-way requirements for the various investments, the analysis necessarily makes general assumptions about the amount of land needed to implement the proposed Transportation 2035 Plan (specific assumptions are cited in footnotes in the detailed analysis). As a result, the analysis presents a worst-case scenario of land use impacts, and the acreages in the analysis should be used as a guide in assessing relative impacts, rather than as absolute statements of impacts. Site-specific analysis will be required when individual projects are considered for approval.

### Farmlands

The farmland analysis determines to what extent the Transportation 2035 Plan may affect the relative ability of local jurisdictions to protect agriculture and open space. To conduct the farmland analysis, 137 of the 557 projects in the proposed Transportation 2035 Plan were identified as projects with potential physical impacts on farmland, based on general characteristics such as widening, construction, and new roadway configurations, as well as the overlap of these projects with mapped farmland. The 137 projects were then studied using Geographic Information Systems (GIS) and compared with the farmland maps referenced in the Environmental Setting to determine the extent of the physical impacts of the proposed Transportation 2035 Plan projects on important agricultural lands.

### Land Use Disruptions/Displacement

The impact analysis includes investigation of potential short term direct impacts due to construction, physical disruptions of existing neighborhoods, including displacement of residents and businesses, as a result of implementation of proposed transportation improvements. The analysis is presented by county and involves assumptions based on limited available information, since in most cases, the transportation projects are in the early planning phases. The assessment identifies Transportation 2035 Plan projects that may involve major right-of-way acquisition or construction activity that could disrupt traffic patterns and neighborhood navigability. The projects with potential physical impacts were studied using Geographic Information Systems (GIS) and compared with year 2005 ABAG land use maps (which included protected open space) to ascertain whether land uses such as residential, employment, or urban open space would be displaced or disrupted.

Additionally, the EIR analyzes the potential for long term community disruption by reviewing the location of Transportation 2035 Plan projects in relation to surrounding land uses and com-

munity development. New road or highway projects, extension projects and major interchange projects are assumed to have a higher potential to divide existing communities, while widening and other projects along established transportation rights-of-way are assumed to have a lower potential to divide existing communities or neighborhoods in the long-term.

### **Consistency with Land Use Plans**

The land use analysis identifies potential conflicts or inconsistencies between the proposed Transportation 2035 Plan and adopted land use policies of the various jurisdictions within the study area. The analysis also identifies Transportation 2035 projects that intersect with airport planning areas.

### SUMMARY OF IMPACTS

### **Direct Impacts**

Implementation of the Transportation 2035 Plan projects could result in loss of agricultural land, short-term disruptions including congestion and residential and business displacements, and long term community land use impacts as a result of the construction of highway and transit projects proposed in the Plan.

### **Conversion of Farmland**

Overall, there are 142 projects in the proposed Transportation 2035 Plan in eight counties with the potential to impact 1,397 acres of farmland, assuming the worst case disturbance. Only 21 percent of this land is Prime Farmland.

### Land Use and Community Disruption/Displacement

There are 149 projects in the proposed Transportation 2035 Plan with the potential to impact 2,154 acres of existing land uses within built communities. These projects could cause short term community disruption in locations where transportation improvements involve significant construction activity. The duration of impact on adjacent and nearby land uses could vary from several months to several years.

Some of these same projects could also result in significant and permanent disruption of existing communities; however, the potential for such disruption is minimized because large freeway, expressway and rail transit projects in the Plan typically involve widening or other capacity increases along existing transportation corridors; they would not split or bisect established communities that share historical links. However, some potential for community disruption remains with widening projects, particularly those that add new travel lanes, which may significantly and permanently change pedestrian and bicycle movement across or along the roadway, as compared to existing conditions. In some cases, the widening project may actually improve pedestrian and bicycle movement because sidewalks or bike lanes may be incorporated into the project scope.

### **Consistency with Local Plans**

The proposed transportation improvements in the Transportation 2035 Plan effectively do not conflict with the land use designations of current local general plans.

Chapter 2.3: Land Use and Housing

### Other Direct Impacts

The implementation of some transportation improvements in the proposed Transportation 2035 Plan could adversely affect adjoining land. Impacts could include increased noise, disturbance of cultural resources, and loss or modifications to significant natural habitats. While these impacts can affect the compatibility of the proposed transportation improvements with adjoining uses, these impacts are more logically addressed in the related chapters of *Part Two* of this EIR.

### Indirect/Cumulative Impacts

Concurrent implementation of the proposed Transportation 2035 Plan and forecasted development of residential and employment land uses would result in the conversion of substantial amounts of Prime and Important farmlands to urban use in the Bay Area.

### IMPACTS AND MITIGATION MEASURES

### Impact

2.3-1 Implementation of the proposed Transportation 2035 Plan could convert farmland, including prime agricultural land designated by the State of California, to transportation use. (Significant, unavoidable)

Land converted from Prime or Important farmland to transportation use can have direct effects in as much as productive land can no longer produce crops, but it may also have indirect effects to the extent that conversion creates fragmentation of agricultural land, adjacent use conflicts, hinders existing transportation access, or restricts infrastructure options that are necessary to the function of the agricultural property.

Overall, there are 142 projects in the proposed Transportation 2035 Plan in eight counties with the potential to impact 1,397 acres of farmland, assuming the worst-case disturbance.<sup>14</sup> Of that farmland, the majority or 57 percent is Grazing Land, 21 percent is Prime Farmland, and the remaining quarter is made up of Farmland of Local and Statewide Importance and Unique Farmland, as documented in Table 2.3-9.<sup>15</sup> Of those 142 projects, most (58) are road widening projects, 31 are projects on interchanges or intersections, 15 are new roads, and the remaining are extensions or other types of physical improvement projects, like parking lots or transit terminals, as illustrated in Table 2.3-10. Though it is particularly difficult to project the potential impact of intersection improvements that result in new roadway configurations and thus may have different edge conditions than the existing intersections. The buffer used to quantify potential impact of intersection improvements is necessarily general—a 100 foot radius—and likely to be a "worst case" estimate of disturbance.

<sup>&</sup>lt;sup>14</sup> The acreage calculation is based on a 100 foot buffer on either side of the centerline of a linear project and a 100 foot radius around the center of a point project, such as an intersection improvement resulting in a new configuration. Existing roadway is categorized as "roadway" and thus not counted in farmland impact totals.

<sup>&</sup>lt;sup>15</sup> The farmland acre totals include land not currently in production. In some cases, these farmlands may be zoned for urban development.

Туре	Acres	Percent
Prime Farmland	290	21%
Farmland of Statewide Importance	44	3%
Farmland of Local Importance	237	17%
Grazing Land	800	57%
Unique Farmland	24	2%
Total	1,397	100%

Table 2.3-9: Types of Farmland Potentially Affected by Proposed Plan

Source: Metropolitan Transportation Commission; Dyett & Bhatia, 2008

		Т	ype of Proje	ect in Plan		
County	Extension	Intersection	New	Widening	Other	Total
Alameda	1	9	3	9	6	28
Contra Costa	3	7	4	13	5	32
Marin		2	1		2	5
Napa	1			I		2
San Mateo	2	4	2	8	2	18
Santa Clara	6	6	4	17	4	37
Solano		1	1	6	2	10
Sonoma	1	2		3		6
Regional/Multiple Counties <sup>a</sup>				I	3	4
Total	14	31	15	58	24	42

Table 2.3-10: Types of Projects Potentially Affecting Agricultural Lands

Source: Metropolitan Transportation Commission; Dyett & Bhatia, 2008

### Chapter 2.3: Land Use and Housing

The types and amounts of farmland potentially affected by Transportation 2035 Plan projects are shown in Table 2.3-11. Alameda and Solano counties are the most impacted, with 364 and 360 acres of potentially threatened farmland, respectively. In Alameda County, the majority (346 acres) of the impacted acres are grazing land. In Solano, 199 acres of grazing land and 155 acres of prime farmland is affected. San Mateo and Marin counties have the least amount of affected land, with only 29 and 81 acres of concern, respectively.

	Farmland of Local Importance	Farmland of Statewide Importance	Grazing Land	Prime Farmland	Unique Farmland	Total
Alameda		0	346	15	3	364
Contra Costa	40	21	81	18	0	160
Marin	69		12			81
Napa	12		27			39
San Mateo	1		10	7	11	29
Santa Clara	4	10	103	62	5	184
Solano		3	199	155	2	360
Sonoma	68	9	21	27	3	128
Total	194	44	800	284	24	1,346

Source: Metropolitan Transportation Commission; Dyett & Bhatia, 2008

With the exception of San Francisco<sup>16</sup> and Solano counties, all other counties in the Bay Area are protected by one or more County-wide land use measures such as urban service areas, environmental corridors, slope/density restrictions, stream conservation areas, or riparian buffers. Additionally, some of the cities have Urban Growth Boundaries (UGB) to limit sprawl and protect agricultural land. Generally, this means that if a project falls outside a UGB, there are regulatory measures in place to aid local jurisdictions in farmland protection. According to Greenbelt Alliance, of the 101 Bay Area cities studied in their 2006 Smart Growth Scorecard, 28 have UGBs as of September 2008. Counties and cities with measures protecting open space are summarized in Table 2.3-12.

<sup>&</sup>lt;sup>16</sup> San Francisco County does not have agricultural land.

County	County-wide Measure	Cities with an Urban Growth Boundary
Alameda	Yes	Dublin, Hayward, Livermore, Pleasanton
Contra Costa	Yes	Antioch, San Ramon
Marin	Yes	Novato
Napa	Yes	Napa, St Helena, Yountville
San Francisco <sup>a</sup>	No	
San Mateo	Yes	Half Moon Bay
Santa Clara	Yes	Cupertino, Gilroy, Milpitas, Monte Sereno, Morgan Hill, San Jose
Solano	No	Benicia, Fairfield, Vacaville
Sonoma	Yes	Cotati, Healdsburg, Petaluma, Rohnert Park Santa Rosa, Sebastopol, Sonoma, Windsor

Table 2.3-12: Bay Area Urban Growth Boundaries and County-wide Land Use Measures

Source: Association of Bay Area Governments, 2006; Greenbelt Alliance, 2008

The likelihood of farmland conversion increases where transportation improvements are located at the edges of existing urban areas, along waterways, or over hills separating urban areas. The extent of this impact will depend on the final design of the identified projects and on the projectspecific analysis require by CEQA to determine the importance of the endangered resource land. However, given the predominant location of projects within developed areas and existing corridors, the conversion of agricultural resource land is likely to be limited. Many municipalities have already planned for the conversion of some open space to urban uses, usually where the land is for grazing (which is not an endangered agricultural activity) rather than agricultural production. However, some conversion could be significant, depending on the amount and type of farmland that is converted.

### **Mitigation Measures**

**2.3(a)** As project sponsors prepare the environmental review document for their individual project pursuant to CEQA/NEPA and prior to environmental certification, project sponsors shall consider adopting appropriate measures that would minimize or eliminate cumulatively considerable environmental impacts pursuant to CEQA/NEPA. MTC shall be provided with status reports of compliance with mitigation measures pursuant to MTC Resolution 1481, Revised. Mitigation measures to reduce impacts on farmlands that shall be considered by project sponsors and decision-makers may include, but are not limited to, those described below.

- Corridor realignment, where feasible, to avoid farmland, especially Prime Farmland;
- Conservation easements on land at least equal in quality and size as partial compensation for the direct loss of agricultural land;
- Abiding by the proper notification provisions of the Williamson Act when it appears that land enrolled in a Williamson Act contract may be required for a public use, is acquired, the original transportation improvement for the acquisition is changed, or the land acquired is not used for the improvement;

### Part Two: Settings, Impacts, and Mitigation Measures Chapter 2.3: Land Use and Housing

- If a Williamson Act contract is terminated, the Department of Conservation recommends a ratio greater than 1:1 of land equal in quality be set aside in a conservation easement;
- Instituting new protection of farmland in the project area or elsewhere in the County through the use of less than permanent long-term restrictions on use, such as 20-year Farmland Security Zone contracts (Government Code Section 51296 et seq.) or 10-year Williamson Act contracts (Government Code Section 51200 et seq.);
- Mitigation fees that support the commercial viability of the remaining agricultural land in the project area, County, or region through a mitigation bank that invests in agricultural infrastructure, water supplies, marketing, etc;
- Minimize severance of agricultural land by constructing underpasses and overpasses at reasonable intervals to provide property access;
- Agricultural enhancement investments such as supporting farmer education on organic and sustainable practices, assisting with organic soil amendments for improved production, and upgrading irrigation systems for water conservation;
- Berms, buffer zones, setbacks, and fencing to reduce use conflicts between transportation facilities and farming uses and to protect the functions of farmland; and
- Other conservation tools available from the California Department of Conservation's Division of Land Resource Protection.

Because it is not known to what extent Prime and Important farmlands can be avoided, implementation of this mitigation measure is expected to reduce potentially significant farmland impacts, but not to a less-than-significant level in all cases.

### Impact

## 2.3-2 Implementation of the proposed Transportation 2035 Plan could disrupt or displace existing land uses, neighborhoods, and communities in the short term. (Significant, unavoidable)

The proposed transportation improvements in the Transportation 2035 Plan could result in short term community disruption where such improvements involve significant construction activity. Transportation projects will undergo construction at different times throughout the 25-year life of the Plan. The significance of the disruption will depend upon the size and extent of the improvement, the nature of the disruption, and the duration of construction. While construction activities are typically limited in duration, work on major transportation improvements such as rail transit extensions, freeway widening projects and major interchange reconstructions, often span a period of several years because the projects are large and complex and/or because the construction contractors are required to keep traffic flowing on existing lanes passing through the construction sites. As a result, the construction of major transportation improvements can result in frequent inconveniences (e.g., blocked or limited access, detours, or delays) and irritations for residents of communities immediately adjacent to the construction sites during the construction period.

There are 149 projects in the proposed Transportation 2035 Plan in nine counties with the potential to impact 2,154 acres of existing land uses, assuming the worst-case disturbance.<sup>17</sup> Of that total, 43 percent is employment related land use (e.g. commercial and industrial), another 33 percent is residential, and the remaining 25 percent is urban open space, as documented in Table 2.3-13. Of those 149 projects, most (59) are widening projects, 31 are related to intersection or interchanges, 15 are new roads, and the remaining are extensions or other types of physical improvement projects, like combination projects, that do not fit into any category, as illustrated in Table 2.3-14. These projects could cause temporary disruptions of homes, businesses, and urban open space.

Land Use	Acres	Percent
Employment Areas	920	43%
Residential	701	33%
Urban Open Space	533	25%
Total	2,154	100%

Table 2.3-13: Generalized Urban Land Uses Potentially Disrupted	by	y l	/ PI	?ro	op	os	ed	Pla	an
-----------------------------------------------------------------	----	-----	------	-----	----	----	----	-----	----

Source: Metropolitan Transportation Commission; Dyett & Bhatia, 2008

		Ту	pe of Proj	ect in Plan		
County	Extension	Intersection	New	Widening	Other	Total
Alameda	I	9	3	9	6	28
Contra Costa	3	7	4	13	5	32
Marin		2	1		2	5
Napa	I			1		2
San Francisco				Ŧ	6	7
San Mateo	2	4	2	8	2	18
Santa Clara	6	6	4	17	4	37
Solano		1	ł	6	2	10
Sonoma	l	2		3		6
Regional/Multiple Counties <sup>a</sup>				I	3	4
Total	14	31	15	59	30	149

### Table 2.3-14: Types of Projects Potentially Disrupting Existing Land Use

Source: Metropolitan Transportation Commission; Dyett & Bhatia, 2008

<sup>&</sup>lt;sup>17</sup> The acreage calculation is based on a 100 foot buffer on either side of the centerline of a linear project and a 100 foot radius around the center of a point project, such as an intersection improvement resulting in a new configuration. Existing roadway is categorized as "roadway" and thus not counted in impact totals.

Chapter 2.3: Land Use and Housing

The counties containing existing land uses potentially affected by Transportation 2035 Plan projects are shown in Table 2.3-15. Solano County has the most amount of impacted land use, totaling 409 acres. The potential disruption occurs mostly in its employment areas, but there is also a substantial amount of disruption in residential and open space areas. Santa Clara County has the second largest urban land use impact, totaling 372 acres; this is followed by Alameda County with 357 acres. Napa County has the least amount of impacted land use at 23 acres. Overall, implementation of the proposed Transportation 2035 Plan has the potential to affect more employment land than residential areas or urban open space.

	Land Use					
County	Employment Areas	Residential	Urban Open Space	Total		
Alameda	75	128	155	357		
Contra Costa	138	82	64	285		
Marin	36	4	4	43		
Napa	9	1	13	23		
San Francisco	79	30	57	166		
San Mateo	75	47	19	141		
Santa Clara	199	129	44	372		
Solano	178	101	130	409		
Sonoma	131	181	47	359		
Total	920	701	533	2,154		

Table 2.3-15: Existing Land Use Acres by County Potentially Affected by Proposed Plan	Table 2.3-15: Existing	Land Use Acres b	y County Potentially	Affected by Proposed Plan
---------------------------------------------------------------------------------------	------------------------	------------------	----------------------	---------------------------

Source: Metropolitan Transportation Commission; Dyett & Bhatia, 2008

### **Mitigation Measures**

**2.3(b)** As project sponsors prepare the environmental review document for their individual project pursuant to CEQA/NEPA and prior to environmental certification, project sponsors shall consider adopting appropriate measures that would minimize or eliminate cumulatively considerable environmental impacts pursuant to CEQA/NEPA. MTC shall be provided with status reports of compliance with mitigation measures pursuant to MTC Resolution 1481, Revised. Mitigation measures to reduce short-term (often construction-related) disruption or displacement of existing land uses, specifically residential, commercial, or urban open space impacts that shall be considered by project sponsors and decision-makers may include, but are not limited to, those described below.

- Berms and fencing to reduce conflicts between transportation facilities and existing uses.
- Regulate construction operations on existing facilities to minimize traffic disruptions and detours, and to maintain safe traffic operations.
- Ensure construction operations are limited to regular business hours where feasible.
- Control construction dust and noise.
- Control erosion and sediment transport in stormwater runoff from construction sites.

Additional applicable mitigation measures are listed under the short-term construction-related impact in *Chapter 2.2: Air Quality*, and are included here by reference. The extent of this impact will depend on the final design of each transportation improvement and the phasing of implementation. Implementation of this mitigation measure is expected to reduce potentially significant impacts related to short-term community disruption, but not to a less-than-significant level in all cases.

### Impact

### 2.3-3 Transportation improvements in the proposed Transportation 2035 Plan have the potential to cause long-term community disruption. (Significant, mitigable)

Local governments have initiated projects in the proposed Transportation 2035 Plan with the intention of enhancing the quality of life in existing communities and neighborhoods. Examples include constructing rail extensions in San Francisco, Oakland, and Silicon Valley, operating Rapid Bus Transit along major corridors, and implementing transit accessibility, traffic calming, and bicycle and pedestrian improvement projects in many communities, throughout the region. Planning projects in urban areas and reusing urban sites or facilities support focused growth and transit-oriented development initiatives (such as improving station access or expanding the capacity of current BART stations), is expected to involve the redevelopment of existing urban sites with higher density development.

All of these urban transportation projects have the potential to change the character of existing communities; however, the potential for permanent community disruption caused by the Transportation 2035 Plan is minimal for the following reasons:

- 1) Historically, transportation improvements with the highest risk of community disruption include *new* freeways, expressways, or rail lines on alignments that pass through existing urban areas and pockets of development in rural areas. Few, if any, of the specific projects in the proposed Transportation 2035 Plan fit this historical mold. The large freeway, expressway and rail transit projects in the Plan all involve widening or other capacity increases along existing transportation corridors; they would not split or bisect established communities that share historical links.
- 2) Some projects in the proposed Transportation 2035 Plan would actually expand interconnections between neighborhoods and communities that are currently separated by major transportation corridors. Examples include bridges or undercrossings (with bike lanes) of commuter rail lines, bicycle/pedestrian overcrossings of freeways, and urban trail and pathway projects.

In some cases, however, highway widening projects may convert stretches of fairly narrow local road to much larger roadway with diminished pedestrian accessibility and visibility from one side to the other, such as a stretch of roadway expanded from 2 lanes to 6 lanes. In these cases, there remains some potential for long term community disruption caused by projects within the proposed Transportation 2035 Plan.

### **Mitigation Measures**

**2.3(c)** As project sponsors prepare the environmental review document for their individual project pursuant to CEQA/NEPA and prior to environmental certification, project sponsors shall

### Chapter 2.3: Land Use and Housing

consider adopting appropriate measures that would minimize or eliminate cumulatively considerable environmental impacts pursuant to CEQA/NEPA. MTC shall be provided with status reports of compliance with mitigation measures pursuant to MTC Resolution 1481, Revised. Mitigation measures to reduce long-term disruption of displacement of existing communities that shall be considered by project sponsors and decision-makers may include, but are not limited to, those described below.

- Berms and fencing to reduce conflicts between transportation facilities and existing uses;
- Pedestrian and bike connectors across widened sections of roadway;
- Sidewalk, signal, and signage treatments to improve the pedestrian connectivity across widened sections of roadway;
- Corridor realignment, where feasible, to avoid land use disruption; and
- Buffer zones and setbacks to protect the continuity of land uses.

**2.3(d)** Through regional programs such as the Transportation for Livable Communities Program, Regional Bicycle Program, etc., MTC shall continue to support locally sponsored traffic calming and alternative transportation initiatives, such as paths, trails, overcrossings, bicycle plans, and the like that foster improved neighborhoods and community connections.

Implementation of these mitigation measures, combined with affirmative efforts to foster localscale alternative transportation initiatives, is expected to reduce potentially significant community disruption to a level that is less than significant.

### Impact

### 2.3-4 Implementation of the proposed Transportation 2035 Plan may conflict with existing local plans. (Less than Significant)

The interagency screening and evaluation process for all locally-sponsored transportation improvements is built upon a foundation of local general plans. The proposed transportation improvements in the Transportation 2035 Plan originate from Project Study Reports (PSR) or transportation corridor studies prepared by Caltrans, the Congestion Management Programs of each county, the Countywide Transportation Plans for a number of counties, and the service plans for a number of transit agencies. These plans and programs have been developed to consider the current needs and future demands identified in local general plans and supporting studies, including local traffic management plans, capital improvement programs (CIPs), transitsupportive development plans, streetscape and pedestrian improvements, and bicycle plans.

While transportation improvements on State and Interstate highways and those sponsored by special districts – such as BART, AC Transit, SamTrans, Golden Gate Transportation District, etc. – are not necessarily derived from local general plans, they are reviewed for consistency with such plans through the congestion management program update process, countywide transportation plan process, and environmental review processes lead by project sponsors. As a result, the proposed transportation improvements in the proposed Transportation 2035 Plan effectively do not conflict with the land use designations of current local general plans.

Projects that fall within Airport Land Use Plans (ALUPs) must comply with these compatibility plans before they are implemented. The entities responsible for establishing the guidelines are Airport Land Use Commissions (ALUCs). State law defines the powers and duties of ALUCs broadly "to assist local agencies in ensuring compatible land uses in the vicinity of all new airports and in the vicinity of existing airports to the extent that the land in the vicinity of those airports is not already devoted to incompatible uses" (Section 21674(a)), and one of the major tools ALUCs have to achieve this goal is to prepare Compatibility Plans: "Each commission is required to "prepare and adopt" an airport land use plan for each of the airports within its jurisdiction (Sections 21674(c) and 21675(a)).

Table 2.3-16 shows the 17 Transportation 2035 Plan projects with potential for physical impacts that also fall within a two-mile radius of the Oakland, San Francisco, or San Jose airports. As all local and county general plans and projects must also be compatible with ALUPs, and RTPs must be compatible with local plans, there are a number of cross-cutting regulatory pressures to ensure that these Transportation 2035 Plan projects do not conflict with airport land uses.

Project ID	Airport	County	Type of Investment*	Description
21602	SFO	San Mateo	N	Reconstruct U.S. 101/Broadway interchange
22084	ΟΑΚ	Alameda	Ν	Improve connection to the Oakland International Air- port's North Field, connecting Route 61 (Doolittle Drive) with Earhart Road and extend the infield area at North Field
22179	SJC	Santa Clara	Ν	Widen Central Expressway from 4 to 6 lanes between Lawrence Expressway and San Tomas Expressway
22186	SJC	Santa Clara	Ν	Widen San Tomas Expressway to 8 lanes between El Camino Real (Route 82) and Williams Road
22230	SFO	San Mateo	Ν	Construct auxiliary lanes (one in each direction) on I- 280 from I-380 to Hickey Boulevard
22676	OAK	Region- al/Multiple Counties	Ν	Improve passenger capacity at 43 BART stations
230170	OAK	Alameda	Ν	Improve access to I-880 from 42nd and High Street
230200	SJC	Santa Clara	Ν	Improve local circulation on St. John Street and Au- tumn Street
230201	SJC	Santa Clara	Ν	Widen Coleman Avenue from 4 to 6 lanes from I-880 to Taylor Street
230210	SJC	Santa Clara	Ν	Rebuild box culvert under San Tomas Expressway
230262	SJC	Santa Clara	Ν	Construct and new interchange at U.S. 101 and Mon- tague Expressway
230267	SJC	Santa Clara	С	Widen and add HOV lanes on Montague Expressway between Lick Mill and Trade Zone Boulevards and on Guadalupe River Bridge and Penitencia Creek Bridge

Table 2.3-16: Projects that Intersect with Airport Planning Areas

### Part Two: Settings, Impacts, and Mitigation Measures Chapter 2.3: Land Use and Housing

Project ID	Airport	County	Type of Investment*	Description
230269	SJC	Santa Clara	С	Construct a new interchange at Trimble Road and Montague Expressway
230 <del>44</del> 9	SJC	Santa Clara	Ν	Extend Charcot Avenue over I-880 as a new two-lane roadway
230456	SJC	Santa Clara	С	Widen Zanker Road from 4 to 6 lanes
230458	SJC	Santa Clara	Ν	Widen Berryessa Road from U.S. 101 to I-680
230664	SFO	San Mateo	Ν	U.S. 101 in San Mateo County from Whipple Avenue to Millbrae – widen for new HOT lane

Table 2.3-16: Projects that Intersect with Airport Planning Areas

Source: Metropolitan Transportation Commission; Dyett & Bhatia, 2008

ABAG's *Projections 2007* was developed based on local input, reviewing of local General Plans and parcel data from county assessors' records. These forecasts may not be entirely consistent with future city policies because *Projections 2007* relies on proactive economic assumptions about land use policies based on smart growth principles. ABAG's policy-based projections specifically forecast more growth in existing communities and near transit, while directing growth away from agricultural areas and open space. Choosing to include a factor that directs growth to areas with public transit would reinforce the importance of encouraging growth in areas with a variety of transportation options. In other words, its forecasts start out and end with a regional growth perspective which may not be consistent with what actually occurs in local jurisdictions whose goals are city-centric.

### Cumulative Impact

# 2.3-5 Concurrent implementation of the proposed Transportation 2035 Plan and forecast development would result in cumulatively considerable conversion of Prime and Important farmlands to urban use throughout the Bay Area. (Significant Cumulative Impact, Contribution Cumulatively Considerable)

ABAG's Projections 2007 anticipate that over the next 25 years, about 2 million new residents and 1.8 million new jobs will be added in the nine-county region. This growth will require the conversion or redevelopment of considerable land in the region to accommodate new jobs and housing. ABAG also projects that about 90,000 acres of open space will be converted to urban use to accommodate this planned growth. This development represents conversion of approximately two percent of the land in the Bay Area to urban uses over the next 25 years, as related in Table 2.3-3.

While not all of the open space converted to urban use will be Prime or Important farmland, the challenge of protecting Prime and Important farmland against encroachment is great, as evidenced by the change in Bay Area agricultural lands over time, reported in Table 2.3-5. Overall, population and development pressure has been stronger than agricultural land preservation practices in the Bay Area in the recent past, and is likely to remain stronger in the near future. There are UGBs and county-wide land use measures in place throughout the Bay Area to protect open

space from conversion to urban use. However, there are still many communities without growth limits in place, and those that do exist vary in quality, effectiveness, and enforcement. Thus, to some extent, this conversion process is likely to be both irreversible and cumulatively significant.

The conversion of farmland to transportation use will contribute somewhat to this significant cumulative impact. In part because the impact is likely to be irreversible, and in part because State and local regulatory agencies already struggle to maintain the resource, even the relatively small (in probable acreage) impact of Plan projects may be considered a cumulatively considerable contribution.

MTC has no land use authority and cannot directly affect the pattern of future land uses. However, in addition to mitigation measures 2.3(a) through 2.3(d), it can strive to implement the following measure to reduce transportation impacts on Prime and Important farmland.

### **Mitigation Measures**

**2.3(e)** MTC shall continue to participate in and promote the efforts of the multi-agency FOCUS project, which is intended to coordinate regional growth efforts to use land more efficiently, optimize transportation and other infrastructure investments in existing communities that focus new development near existing transit, preserve open space, etc. In this way, MTC, in partnership with regional agencies such as ABAG, and advocacy groups such as Greenbelt Alliance and TransForm (formerly TALC), can pursue the enhanced coordination of local land use planning with transportation investments in the proposed Transportation 2035 Plan.

Because of MTC's lack of a direct role in land use planning, this measure is not expected to reduce this overall cumulative impact to a less-than-significant level, and the Project's contribution remains cumulatively considerable.

### **3.1** Alternatives to the Project

This chapter documents the alternatives development and screening process and analyzes several alternatives identified during preparation of the proposed Transportation 2035 Plan. Key features of each alternative are presented, and potential impacts are discussed and compared to the impacts of the proposed Transportation 2035 Plan.

The CEQA Guidelines require EIRs to describe a reasonable range of potentially feasible alternatives to a proposed project or program. That is, the EIR needs to analyze only those alternatives that will help decision-makers make reasoned choices. The range of alternatives shall include those that "would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project" (CEQA Guidelines, Section 15126.6(a)). "Feasible" means that the alternatives "are capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social and technological factors" (CEQA Guidelines, Section 15364). In addition, the EIR must evaluate the No Project alternative, which allows decision makers to compare the impacts of approving the project with the impacts of not approving the project.

If the alternatives themselves would have significant environmental impacts, the EIR must identify them. The alternatives may result in new impacts that do not result from the proposed Project. The EIR need not analyze these alternatives at the same level of detail that it analyzes the project itself. The CEQA Guidelines require only that the EIR provide enough information to allow meaningful evaluation, analysis and comparison. Quantified information on the alternatives is presented where available; however, in some cases only partial quantification can be provided because of data or analytical limitations.

Finally, the CEQA Guidelines require each EIR to identify the environmentally superior alternative among the alternatives analyzed. If the No Project alternative is the environmentally superior alternative, the EIR must select another alternative from among the alternatives analyzed.

### ALTERNATIVES SCREENING

An extensive screening process was conducted to identify potential Plan alternatives and to ultimately identify a reasonable range of alternatives for full evaluation in this EIR.

### PRELIMINARY ALTERNATIVES REVIEW

In July 2007, the MTC Planning Committee directed staff to conduct a vision scenario analysis of three infrastructure scenarios relative to a set of specific performance targets for reducing congestion, vehicle miles traveled, and carbon dioxide and particulate matter emissions, and housing/transportation costs for working families. The three infrastructure packages were as follows: (1) freeway performance package that utilizes technology such as traffic operation systems (TOS), ramp meters, and communication equipment to improve system performance (which is collectively called the Freeway Performance Initiative); (2) a Regional High-Occupancy Toll (HOT) Network supported by a robust system of express and local bus services; and (3) a Regional Rail and Ferry scenario that calls for major improvements and expansions of the existing rail and ferry networks. This analysis applied land use and pricing sensitivity tests to each

infrastructure scenario to see how such policy measures could help the region achieve its performance targets. The key findings from this scenario analysis were that investing in infrastructure improvements alone had minimal effect on improving system performance and mobility relative to the targets. However, aggressive pricing strategies that increased the cost of driving had a much bigger effect in the short-term in moving the region closer to meeting the targets. Also, aggressive land use strategies that called for compact development in existing communities near transit also had a much greater influence over the long-term towards meeting the targets.

From this early vision scenario analysis, MTC generated a preliminary range of project alternatives for consideration in the EIR, and included them in the Notice of Preparation (NOP) for public comments (see Appendix A). These preliminary alternatives—the No Project, Financially Constrained, New Pricing Concepts, and New Non-Pricing Concepts—were designed to attain most of the Transportation 2035 Plan goals and potentially lessen the Plan's environmental effects. MTC discussed these preliminary alternatives with the Bay Area Partnership and its Technical Advisory Committee<sup>1</sup> and presented these alternatives at the two public EIR scoping meetings.

Subsequently, as part of the investment tradeoffs and decision making process that is described in *Chapter 1.2: Overview to the Transportation 2035 Plan*, MTC performed a detailed project-level assessment for a subset of projects and programs to include in the Transportation 2035 Plan – the proposed Project. The assessment included a quantitative appraisal to measure benefit/cost with respect to the performance objectives and a qualitative policy assessment to reflect the somewhat broader considerations embodied in the Three Es and plan goals. The purpose of the project-by-project assessment was to identify outliers—projects that most strongly support the plan's performance objectives and goals. The Commission's intent was to include the highest-performing projects (those that both yield a high financial return for each dollar invested and address multiple goals), and to exclude the lowest-performing projects (those that cost more than the benefits produced and address only a few goals.)

The Commission ultimately considered both the performance results and partner/public input in deciding on the set of transportation projects to be included in the financially constrained plan. As such, "high performers" such as the Freeway Performance Initiative, Regional HOT Network, and transit efficiency projects are included in the proposed Project, along with "lower performers" such as the Lifeline Transportation Program, Transportation Climate Action Campaign, and some freeway and expressway widening, interchange improvements, and local circulation improvement projects. The Commission aimed to provide a balanced portfolio of investments in the areas of system maintenance, efficiency and expansion to relieve present and future traffic congestion, accommodate increases in travel demand caused by projected

<sup>&</sup>lt;sup>1</sup> The Bay Area Partnership Board is comprised of the top staff of various transportation agencies in the region (MTC, public transit operators, county congestion management agencies, city and county public works departments, ports, Caltrans, U.S. Department of Transportation) as well as environmental protection agencies. The Partnership works by consensus to improve the overall efficiency and operation of the Bay Area's transportation network, including developing strategies for financing transportation improvements.

Chapter 3.1: Alternatives to the Project

population and job growth, and help the region make progress in attaining the Three Es, plan goals and performance objectives. The investment strategy approved by the Commission is reflected in the proposed Project.

### ALTERNATIVES IDENTIFIED DURING EIR SCOPING

In response to the NOP, MTC received and evaluated several comment letters and oral comments containing recommendations regarding alternatives. Below is a summary of public/agency comments regarding alternatives and information on why these suggestions were either included or not included for full evaluation in the EIR.

• The various alternatives proposed should analyze realistic inputs and assumptions in addition to analyzing what needs to be achieved to meet the targets adopted by the Commission; this applies to land use assumptions, which in addition to an aggressive development scenario, should be based on the latest Projections as required by state law; the alternatives analyzed should clearly document the level of transportation dollars that are expected in the next 25 years versus the needs to show disparity between resources and needs; the eligibility criteria for the various fund sources should be documented and tied to the projects and programs proposed so that it is obvious that what is proposed in the financially constrained alternative is indeed fundable (Alameda County Congestion Management Agency, letter dated March 19, 2008).

The latest ABAG projections (*Projections 2007*) were used as the underlying socioeconomic demographic assumptions for the proposed Project and the alternatives, with one exception – an alternative land use strategy was examined as part of Alternative 4 (described below). The evaluation of the proposed Project against the performance objectives adopted by the Commission was conducted separately from the EIR, as these are not CEQA issues in and of themselves and are not necessarily the same as the thresholds of significance for CEQA purposes. The financial assumptions for the set of projects and programs identified for inclusion in the financially constrained plan were examined as part of the Transportation 2035 planning process.

- Alternatives should be defined solely as different lists of investments to distinguish changes produced by the alternatives versus the proposed Project; pricing alternatives and "other" alternatives should be run as sub-alternatives on each of the alternatives to allow comparisons amongst alternatives; one pricing sub-alternative should focus on freeway congestion pricing and the other sub-alternative center on moderate congestion relief; an emissions-reduction alternative comprised of a transportation network designed to reduce greenhouse gas emissions should be evaluated, and the TRANSDEF Smart Growth alternative from the Transportation 2030 EIR should be revised for this purpose (TRANSDEF, letter dated March 20, 2008 and oral comments at March 13, 2008 EIR scoping meeting).
- Pricing as a sub-alternative, or sensitivity analysis, to the other alternatives should be applied; having smart land-use and better pricing as separate alternatives makes it impossible to isolate which changes from the proposed Project actually produces the results; for that reason the different alternatives should be defined solely as different lists of investments combinations of projects and programs; this would help decision-makers decide on which pricing and land use interventions are likely to have the greatest impact under a range of investment scenarios (TALC, letter dated March 20, 2008).

The suggestion to define alternatives as different investments is a reasonable one. During late spring 2008, the Commission discussed various investment priorities for the financially constrained plan and the tradeoffs that must be made amongst the priorities given that need exceeds resources available. This tradeoff discussion was focused primarily on how much funding should go towards maintaining the existing transit, local roadway and State highway systems and how much funding should go towards projects that help advance the plan's goals, particularly the goal of climate protection. The Heavy Maintenance/Climate Protection Emphasis alternative (which is described in more detail below) reflects an alternative investment strategy to the one contained in the proposed Project.

The suggestion to evaluate pricing and land-use strategies within the context of a sensitivity analysis (i.e., sub-alternatives) is also reasonable. However, rather than combining pricing and land use strategies together as part of an alternative, MTC conducted separate sensitivity analyses. These analyses help to distinguish how the environmental impacts of an alternative coupled with pricing strategies would differ from an alternative coupled with more focused growth land-use strategies.

MTC considered the suggestion to re-evaluate a modified TRANSDEF Smart Growth alternative that is designed to reduce greenhouse gas emissions. MTC has previously examined the TRANSDEF Smart Growth alternative as part of the Transportation 2030 EIR<sup>2</sup>, and more recently, MTC, in partnership with ABAG, also tested the impacts of its own aggressive pricing and land use strategies as part of the vision scenario analysis for the Transportation 2035 Plan. Based on these analyses, MTC found that re-evaluating the proposed TRANSDEF alternative would not produce markedly different results compared to the prior Transportation 2030 EIR and Transportation 2035 vision scenario analyses, and therefore would not provide the Commission with new or meaningful information for use in its decision-making. Also, more importantly, the Transportation 2030 EIR raised concerns about the feasibility of the underlying assumptions for the TRANSDEF Smart Growth alternative, including the deletion of over 200 committed, fully funded projects from the network definition and the addition of new transit services without operating funds. Furthermore, transit shortfalls remain in the proposed Transportation 2035 Plan; these shortfalls must be addressed prior to adding new transit services without operating and capital maintenance funds. For these reasons, MTC found this alternative suggestion to be infeasible.

• The EIR should evaluate the greenhouse gas emissions impacts of the alternatives, and study an alternative that includes substantially more focused growth, such as higher density development scenarios created by ABAG. (Greenbelt Alliance, letter dated March 20, 2008)

MTC evaluated the greenhouse gas emissions impacts of the alternatives, and as explained above, applied the aggressive land use strategies developed by ABAG as part of the alternatives analysis (see Alternative 4).

<sup>&</sup>lt;sup>2</sup> See also MTC, Draft EIR for the Transportation 2030 Plan (October 2004)

### Part Three: Alternative and CEQA-Required Conclusions

Chapter 3.1: Alternatives to the Project

• Each alternative should compare the level of transit service by transit operator (as well as bus versus rail) in each county; the estimated cost per rider for each alternative should also be calculated; each pricing mechanism should be evaluated by community of concern and income quintile to gauge the equity impact; wherever possible the benefits of bus riders versus rail or other mode should be evaluated; the TRANSDEF proposal should be evaluated and in particular for their relative equity impacts by communities of concern, income quintile and/or by benefits to bus riders versus rail or other modes (Urban Habitat, letter dated March 20, 2008).

In general, a program-level EIR evaluates the broad environmental impacts of a program of projects, in which impacts are identified on a regional basis, rather than by individual community. Also, CEQA does not require assessment of social and economic impacts unless they result in a physical impact on the environment. This EIR does not specifically analyze the economic impacts of pricing strategies on communities of concern, nor analyze the air quality impacts of individual communities of concern, nor distinguish the cost per rider on each public transit system for each alternative.

However, MTC prepared a separate, more detailed equity analysis, as done for past RTPs, which gauged the equity impacts associated with the proposed Project and alternatives.<sup>3</sup> This equity analysis evaluated plan expenditures per household (low-income versus all other households); access to low-income jobs within 30 minutes by auto and transit in communities of concern versus remainder of the region; access to non-work activities within 30 minutes by auto and transit in communities of concern versus remainder of concern versus the remainder of the region; toxic air contaminant emissions in communities of concern versus the remainder of the region; and housing and transportation affordability in communities of concern versus the remainder of the region. Each indicator was evaluated in terms of absolute change between the existing conditions and the proposed Project and between the proposed Project and No Project alternative.

• The EIR should consider an alternative that, where feasible, "eliminates from the Proposed Transportation Plan so-called 'committed' projects that would contribute to adverse cumulative impacts on climate." MTC should shift the \$29 billion in committed revenue for transit and roadway expansion to transportation investments that improve and expand urban and suburban core transit, programs for walkability, bicycling and other alternative modes, transit access, housing near transit, and local blueprint plans that coincide with the regional blueprint; at least one alternative should be designed to maximize the reduction of greenhouse gas emissions; there are many policies and/or projects that MTC could consider to help achieve this goal, some of which it already considered and could fund at significantly higher level; some possibilities include the following: focus on eliminating transit shortfalls; increase service capacity to meet increased demand for public transit in the urban core areas; increase funding for transportation infrastructure to serve infill and mixed use development,

<sup>&</sup>lt;sup>3</sup> See MTC's Transportation 2035 Equity Analysis Report (January 2009). This report, along with other technical supplemental reports for the Transportation 2035 Plan, is posted on MTC's website <www.mtc.ca.gov>.

increase incentives for use of public transit, ridesharing and carpools, and expanded transit frequency for operation (California Attorney General, letter dated October 1, 2008).

MTC considered the suggestion to shift the \$29 billion in committed funds for transit and roadway expansion included in the proposed Project for other uses, but did not carry this alternative forward for full EIR analysis because of the infeasibility of reallocating (or shifting) such funds. As discussed in Chapter 2.1 (Overview), MTC evaluated the committed transit and road expansion projects that make-up the \$29 billion, and found that (1) most of the projects are in the advanced stages of project development (design, right-of-way and construction); (2) most projects are funded by local, regional, state, or federal funds that are obligations that MTC has no discretion to redirect; and (3) most projects meet one or more of the plan's goals. Only a few projects were still in the early planning and environmental phase of project development, had funds from other state or federal funds subject to MTC discretion, and met only one goal. In its review of the staff evaluation and consideration of public comments, the Commission determined that it was not feasible to shift the funds away from these projects because the projects are meritorious in providing mobility of goods, services and people and because of long-standing local and regional commitments to delivering these projects.

To address the Attorney General's suggestion to evaluate an alternative that reduces greenhouse gases, MTC revised the Heavy Maintenance alternative to reflect increased funding levels for projects that maximize maintenance investments and reduce greenhouse gas emissions. This is accomplished by shifting the \$26 billion in uncommitted discretionary revenues (which the Commission has authority to direct to specific uses) to cover transit and local roads maintenance shortfalls and to increase funding for transportation projects that support walking, bicycling and transit use and infill and mixed use development in existing communities near transit. This is reflected in the Heavy Maintenance/Climate Protection Emphasis alternative, which is described and analyzed in the following section.

• An alternative with respect to equity that says trucks can go on I-580 should be evaluated (Greg Harper, oral comment at March 10, 2008 EIR scoping meeting).

MTC evaluated particulate matter emissions of the proposed Project as part of the air quality analysis. However, because the State of California, not MTC, has the authority as the owner and operator of the State highway system to designate I-580 as a truck route, an alternative that designates I-580 as a truck route is not considered feasible. (CEQA Guidelines, Section 15364.)

### ALTERNATIVES ANALYZED IN THIS EIR

This EIR evaluates the No Project alternative as required by CEQA, as well as three other alternatives developed through the screening process. As with the proposed Transportation 2035 Plan, ABAG's *Projections 2007* serve as the underlying demographic and land use assumptions for the EIR analysis of alternatives, with specific exceptions noted. The descriptions of the alternatives are provided below, followed by an analysis that compares the environmental impacts of each alternative to the proposed Project. A complete listing of projects by alternative is provided in Appendix C.

Part Three: Alternative and CEQA-Required Conclusions

Chapter 3.1: Alternatives to the Project

### ALTERNATIVE I: NO PROJECT

The No Project alternative addresses the effect of not implementing the Transportation 2035 Plan. This alternative includes a set of transportation projects and programs that are in advanced planning stages and slated to go forward since they have full funding commitments. (Therefore, the No Project alternative is not equivalent to existing conditions.) These projects are: (1) identified in the federally required Fiscal Year 2009 Transportation Improvement Program, a four-year funding program of Bay Area projects and programs, (2) not yet in the TIP but are fully funded sales tax projects authorized by voters in seven Bay Area counties, including San Francisco, Santa Clara, San Mateo, Alameda, Contra Costa, Sonoma and Marin, or (3) not yet in the TIP but fully funded through other committed funds as defined by statute or Commission policy. This alternative does not include transportation projects and programs funded by the \$32 billion in uncommitted discretionary funds.

### **ALTERNATIVE 2: HEAVY MAINTENANCE/CLIMATE PROTECTION EMPHASIS**

This alternative is financially constrained to the \$220 billion projected revenue available to the region over the next 25-years. Unlike the proposed Project, this Heavy Maintenance/Climate Protection alternative places its investment emphasis almost entirely on system maintenance and efficiency projects that support the plan goals.

This alternative maximizes the use of available discretionary funds for investments that (1) reduce shortfalls for transit and local roadway maintenance; (2) improve walkability, bicycling, transit access, and carpooling and ridesharing; (3) help local jurisdictions to plan and build housing near transit; and (4) implement public education and outreach programs to raise awareness and facilitate behavior changes that help the region to meet its climate protection goal. The set of projects and programs in this alternative is designed to reduce vehicle miles traveled and/or greenhouse gas emissions.

This alternative retains the plan expenditures for the \$194 billion in committed funds because these funds are committed to specific uses by statute or Commission policy, but redirects uncommitted discretionary revenues. Because this alternative focuses on system maintenance and efficiency, it excludes all expansion, including the Regional HOT Network and the transit and roadway expansion projects that in the proposed Project are funded in part by the \$32 billion discretionary funds. As a result of the exclusion of the Regional HOT Network, the \$6.1 billion in net revenue that the Regional HOT Network would generate is not available to fund corridor improvements (such as transit operating and capital needs, freeway operations, interchanges, roadway maintenance and local access improvements). This leaves \$26 billion in uncommitted discretionary funds that can be redirected to other project priorities, as follows:

- \$11 billion of the \$21 billion transit capital maintenance shortfall (this is a \$4.6 billion increase in the funding level from the proposed Project);
- \$9 billion of the \$18 billion local roadway shortfall (this is a \$2 billion increase in the funding level from the proposed Project);
- \$3 billion to the Transportation for Livable Communities Program, which provides capital funds to improve pedestrian, bicycle and transit access and planning funds to create station area plans for housing/mixed uses near transit stations/stops (this is a \$900 million increase in the funding level from the proposed Project);

- \$1.3 billion to the Regional Bicycle Program (this is a \$300 million increase in the funding level from the proposed Project for purposes of completing the commuter routes of the regional bicycle network and providing bicycle access on toll bridges);
- \$900 million to the 5-year Transportation Climate Action Campaign, which includes outreach/education programs, Safe Routes to Schools, Safe Routes to Transit, climate grants/incentives, and transit priority measures to improve bus transit speed and reliability (this is a \$500 million increase in the funding level from the proposed Project); and
- \$1.1 billion to the Lifeline Transportation Program, which addresses the mobility needs of low-income communities by providing funding to projects such as transit capital and operations, community shuttles, pedestrian infrastructure improvements, auto-based programs, demand-responsive services for seniors and children, transportation outreach and information projects, and programs providing fare assistance (this is a \$400 million increase in discretionary funding in addition to the \$300 million previously committed in the proposed Project).

### ALTERNATIVE 3: HEAVY MAINTENANCE/CLIMATE PROTECTION EMPHASIS + PRICING STRATEGIES

This alternative reflects the same project definition as Alternative 2 (Heavy Maintenance/Climate Protection Emphasis) plus it includes applying user-based pricing strategies in order to determine how pricing might influence the performance of infrastructure investments. The pricing strategies are intended to induce changes in travel behavior by increasing the cost of driving. They include: (a) carbon tax or tax on vehicle miles driven, (b) congestion fee for using congested freeways during peak periods, and (c) increased parking charges.

To represent the carbon tax or VMT tax, gas prices are assumed to increase by 21 percent from \$7.47 per gallon to \$9.07 in 2035 (all in 2008 current dollars). Overall, the total auto operating cost per mile would also increase by 21 percent, from 39 cents per mile to 47 cents per mile. For the congestion fee, a charge of 25-cents per mile on congested freeways is added to freeway segments where the volume-to-capacity ratio exceeds 0.90 (very congested facilities). For the parking charge, parking costs are increased by \$1.00 per hour to both peak and off-peak trips. This impacts both work and non-work trips, and has a higher impact on short trips than long trips. So, these increased parking costs will end up showing more non-motorized (bicycling and walking) trips in the pricing tests. The aggregate effect of these pricing strategies is a substantial increase in auto operating cost. This alternative aims to encourage more people to bike, walk and take transit, drive less, and produce less transportation-related greenhouse gas emissions by making it very expensive to drive.

MTC tested these pricing strategies as part of the vision scenario analysis in fall 2007 in response to expressed interest by the State legislators to pursue a carbon tax, VMT tax or congestion pricing and public interest to increase parking charges. These pricing strategies were tested under this alternative for CEQA evaluation purposes. At this time, MTC has no legislative authority to implement the pricing strategies described in this alternative. Chapter 3.1: Alternatives to the Project

#### ALTERNATIVE 4: HEAVY MAINTENANCE/CLIMATE PROTECTION EMPHASIS + LAND USE STRATEGIES

This alternative reflects the same project definition as Alternative 2 (Heavy Maintenance/Climate Protection Emphasis) plus it includes an alternative land use forecast in order to determine how a different kind of regional growth might influence the performance of infrastructure investments. This alternative land use forecast is a policy forecast, as opposed to a purely market-driven outcome. ABAG staff produced this alternative land use forecast with the objective of balancing jobs and housing and targeting growth in existing communities and near transit. Compared to *Projections 2007*, this forecast reflects considerable shifts in regional growth away from the fringes and toward existing employment and housing centers, areas projected to have either household or employment growth, and areas with existing and/or planned transit. It also assumes fewer incommuters from neighboring regions by accommodating 37,000 more households within the Bay Area. This alternative assumes no pricing strategy.

This alternative is expected to maximize transit use and reduce auto trips and vehicle miles traveled because the land use strategy places projected population growth near existing and planned transit services and employment centers. However, much of the land surrounding existing and planned transit stations may not be currently zoned for higher density residential and commercial uses. To encourage transit-oriented development, local land use policy will need to be modified to allow for higher densities than currently allowed and to revise parking regulations to support transit-oriented development.

This alternative assumes that the regional planning agencies of ABAG, the Bay Area Air Quality Management District (BAAQMD), the Bay Conservation and Development Commission (BCDC) and MTC will collaborate to promote and achieve more focused urban growth than estimated in *Projections 2007*, in part through existing and planned programs and improvements contemplated by this alternative. Specific policy approaches have not been selected, however, some possible examples of regional policy approaches and implementation mechanisms to achieve the alternative land use forecast include increasing public awareness of the impacts of travel and location decisions, continuing to coordinate with local governments and vice versa, providing financial incentives to support Priority Development Areas (PDAs), and expanding the MTC Transit-Oriented Development Policy to include minimum employment densities and regional transit centers. The regional agencies must also work with local jurisdictions to modify the land use elements of their general plans, which is a key driver to implementing this land use strategy.

#### **COMPARATIVE IMPACT ANALYSIS OF ALTERNATIVES**

This section compares the environmental impacts of each alternative to the proposed Project, by resource issue area. The primary differences between the proposed Project and the alternatives are assumptions about infrastructure expansion, assumptions about future land use development and distribution, and assumptions about the cost to consumers of using the transportation system.

The Heavy Maintenance/Climate Protection Emphasis alternative focuses discretionary funds on covering transit and local roads maintenance shortfalls, funding climate, bicycle, pedestrian, lifeline and livable communities programs, and continuing funding for Resolution 3434 transit

expansion projects and other transit improvements. It excludes major new infrastructure investments such as the Regional HOT Network, Freeway Performance Initiative, and road and transit expansion projects that are included in the proposed Project. For the most part, this results in reduced road and transit supply which has relatively lower potential for physical environmental impact than that which is present in the proposed Project. This holds true for the two related Heavy Maintenance/Climate Protection Emphasis alternatives with Land Use and Pricing variations. However, while the Heavy Maintenance/Climate Protection Emphasis alternatives can be expected to have fewer physical impacts overall due to less construction of new infrastructure, these alternatives may also result in more congestion in those areas where necessary new capacity (auto or transit) is not provided. The land use and pricing assumptions also result in subtle differences in the impact and effectiveness of these alternatives.

The proposed Project, No Project, Heavy Maintenance/Climate Protection Emphasis, and Heavy Maintenance/Climate Protection Emphasis + Pricing alternatives all share the same basic regional land use assumptions provided in *Projections 2007*. The Heavy Maintenance/Climate Protection Emphasis + Land Use alternative, however, assumes denser and more city/transit-centric development than *Projections 2007*. It may therefore be generalized that the Heavy Maintenance/Climate Protection Emphasis + Land Use alternative would result in somewhat less cumulative impact related to open space land conversion and other natural area impacts, but would, on the other hand, result in potentially more impact on the existing urban spatial structure, particularly around transit stations and along target development corridors.

The proposed Project, No Project, Heavy Maintenance/Climate Protection Emphasis, and Heavy Maintenance/Climate Protection Emphasis + Land Use all share the same transportation pricing assumptions such as parking fees and transit fares. The Heavy Maintenance/Climate Protection Emphasis + Pricing alternative, however, assumes an increase in the cost of driving implemented through methods such as carbon taxes, taxes on vehicle miles driven, congestion fees for using congested freeways during peak periods, and increased parking charges. It may therefore be generalized that the Heavy Maintenance/Climate Protection Emphasis + Pricing alternative would result in somewhat less impact from single-occupancy vehicle miles traveled (emissions, congestion) in relation to the other alternatives.

#### TRANSPORTATION

#### **Proposed Transportation System Capacity Increases (Supply)**

Table 3.1-1 presents the differences in the supply of the transportation system among the alternatives. Key highlights are as follows:

- Because the proposed Project includes discretionary funding for roadway and transit expansion projects beyond those that are already committed, it results in the greatest increase in transportation supply. The proposed Project adds a six percent increase in total roadway lane miles (1,120 lane miles) and an 18 percent increase in transit seat miles (600,000 seat miles) over existing conditions due to the investments in the proposed Transportation 2035 Plan.
- The No Project alternative and the three Heavy Maintenance/Climate Protection Emphasis alternatives have the same level of transportation supply, which is two percent fewer roadway lane miles and ten percent fewer transit seat miles compared to the proposed Project. These alternatives do not include the set of roadway and transit expansion projects funded by

Chapter 3.1: Alternatives to the Project

discretionary funds that are reflected in the proposed Project. The No Project alternative only includes committed projects and programs, while the three Heavy Maintenance/Climate Protection Emphasis alternatives direct discretionary funding not towards expansion projects but towards investments in maintenance, shortfalls, and efficiency projects and programs that attempt to improve system performance without expanding transportation system capacity.

#### Projected Changes in Transportation Mode and Vehicle Travel

Table 3.1-2 shows the differences in regional travel activity amongst the alternatives. Key highlights are as follows:

- Due largely to the increase in the cost of driving, the Heavy Maintenance/Climate Protection Emphasis + Pricing alternative provides the most reduction in trips by auto (6 percent fewer auto trips than the proposed Project) and most increase in transit trips (16 percent increase in transit trips over the proposed Project), bicycle trips (35 percent increase in transit trips over the proposed Project), and walk trips (28 percent increase in walk trips over the proposed Project).
- Compared to the proposed Project, daily transit boardings decrease by 5 percent under the Heavy Maintenance/Climate Protection alternative but increase by 2 percent with the addition of aggressive land use strategies under the Heavy Maintenance/Climate Protection Emphasis + Land Use and 16 percent with the addition of aggressive pricing strategies under the Heavy Maintenance/Climate Protection + Protection + Pricing alternative.
- The amount of daily vehicle miles traveled decreases by 5 percent under the Heavy Maintenance/Climate Protection Emphasis + Pricing alternative and 1 percent under the Heavy Maintenance/Climate Protection Emphasis + Land Use alternative compared to the proposed Project. The reduction in daily vehicle miles traveled is attributable to the effects of aggressive pricing and land uses strategies which makes auto use less attractive compared to other modes and places housing much closer to jobs and essential services, thus resulting in shorter trips and more biking and walking.
- Vehicle hours of delay is lowest for the proposed Project (36 percent reduction compared to the No Project alternative) due primarily to investments in the Freeway Performance Initiative and Regional HOT Network More specifically, FPI provides for: (1) ramp meters that spread platoons of entering vehicles to improve merging maneuvers and reduce delays to freeway traffic, (2) closed circuit television cameras and traffic monitoring stations that detect incidents, (3) communication of incidents to the regional Transportation Management Center (TMC) so that those incidents can be responded to and cleared as quickly as possible to reduce delays and decrease the occurrence of secondary incidents, and (4) TOS elements, such as highway advisory radios, extinguishable message signs, changeable message signs and the Bay Area's 511 system, that provide a means of communicating messages quickly to motorists upstream of decision points, allowing them to make informed decisions on the best routes to their destinations. Also, the Regional HOT Network adds HOV/HOT lane miles and makes more efficient use of freeway capacity by varying toll amounts to balance supply and demand.<sup>4</sup> Tolls during the most congested periods will be comparatively high so only a

<sup>&</sup>lt;sup>4</sup> See MTC's Bay Area HOT Network Study (December 2008).

small number of solo drivers will buy in while tolls will be much lower during periods of light traffic. Neither of these investments in freeway performance are included in the Heavy Maintenance/Climate Protection alternative or its Land Use and Pricing variations, so vehicle hours of delay are much higher for those alternatives when compared to the proposed Project.

#### Accessibility to Jobs

Table 3.1-3 shows relative differences in accessibility to jobs amongst the alternatives. Aggressive land use strategies strike a better jobs/housing balance and place more jobs and housing near transit, thus the Heavy Maintenance/Climate Protection Emphasis + Land Use alternative provides for the best overall level of accessibility to jobs by autos and transit. Compared to the proposed Project, the number of jobs accessible by autos under this alternative increases by 11 percent within 15 minutes, 2 percent within 20 minutes and 4 percent within 45 minutes and the number of jobs accessible by transit increases by 44 percent within 15 minutes, 12 percent within 30 minutes and 7 percent within 45 minutes. This improvement in accessibility to job comes without any corresponding increase in roadway and transit supply, illustrating the powerful effects of aggressive land use strategies.

Compared to the proposed Project, the Heavy Maintenance/Climate Protection Emphasis + Pricing alternative provides modest improvement in accessibility to jobs by autos and transit because of the congestion relief characteristics of pricing that benefits auto travel by directing more trips to transit (as discussed above).

Compared to the proposed Project, the No Project alternative and the Heavy Maintenance/Climate Protection Emphasis alternative result in overall fewer jobs accessible by auto and transit for all three time intervals, with slightly fewer jobs accessible by autos and significantly fewer jobs accessible by transit.

#### Vehicle Miles Traveled (VMT) by Facility Type and Volume to Capacity Ratio (V/C)

As shown in Table 3.1-4, the proposed Project experiences increases in the total regional VMT at LOS F for all facilities between 2006 and 2035 due to the additional travel generated from future population and employment growth (which outpaces the level of investments in improving efficiency and expanding the capacity of the regional transportation system in the proposed Transportation 2035 Plan).

Compared to the proposed Project, all the alternatives would result in higher levels of VMT at LOS F for freeways, primarily due to the absence of the Freeway Performance Initiative in the alternative set of projects, the single most cost-effective program that eliminates freeway congestion.

However, the Heavy Maintenance/Climate Protection Emphasis + Land Use alternative substantially reduces VMT at LOS F for expressways and arterials compared to the proposed Project primarily due to the proximity of people to transit, jobs, and other destinations. The Heavy Maintenance/Climate Protection Emphasis + Pricing alternative modestly reduces VMT at LOS F for expressways and arterials compared to the proposed Project due to the dampening affect of pricing auto travel. Considering all roadways together, the proposed Project performs slightly better than all alternatives.

Chapter 3.1: Alternatives to the Project

#### Vehicle Miles Traveled (VMT) Per Capita

The projected per capita VMT will increase slightly by 4.4 percent (from 20.3 to 21.3) by year 2035 under the proposed Project relative to existing conditions primarily due to the cumulative impact of projected regional growth in population and jobs in the Bay Area. The proposed Project increases transit supply by 18 percent over existing conditions, thereby reducing VMT; while lane miles increase by 6 percent, thereby slightly increasing VMT. The net affect is a slight increase in overall per capita VMT.

Both the Heavy Maintenance/Climate Protection Emphasis + Pricing alternative and the Heavy Maintenance/Climate Protection Emphasis + Land Use alternative result in slightly lower per capita VMT (2.8 percent and 4.2 percent less, respectively, compared to the proposed Project). In general, the amount of VMT and per capita VMT are lower under both alternatives due either to pricing strategies that increase the cost of driving (thereby, reducing auto trips and increasing transit, walk and bike trips) or the land use strategies that call for a more balanced allocation of jobs and housing and placement of jobs and housing near transit (thereby, reducing the length and number of auto trips and increasing transit, walk and bike trips).

Both the No Project alternative and the Heavy Maintenance/Climate Protection Emphasis alternative would increase per capita VMT by 0.5 percent compared to the proposed Project. These alternatives do not increase roadway and transit supply, thereby, providing less accessibility to jobs by transit and transit use in general.

Project 201--35% -5% -8% -1% -2% -2% -2% -13% -22% -3% -10% from Difference Proposed ,241,000 4,480 520 1,010 14,900 220,000 653,000 211,000 Maintenance/ 20,950 Heavy Climate Protection + ,295,000 Land Use 9 3,621,000 \* \* -Difference from Proposed Project -35% -2% -2% -13% -22% -5% -8% -2% -3% -10% Heavy Maintenancel 010,1 20,950 1,241,000 4,480 520 14,900 220,000 653,000 211,000 Pricing \$ ,295,000 Climate Protection + 3,621,000 Difference \* -1% -2% -2% -2% -13% -22% -3% from Project -35% 200 -10% Proposed -5% Climate 220,000 653,000 Heavy 4,480 520 1,010 <del>\$</del> 14,900 20,950 ,295,000 ,241,000 211,000 Protection 3,621,000 Maintenance/ from Proposed Project \*---1% -2% -2% -13% -3% Difference -35% -5% 28--2% -22% -10% 2035 No 20,950 220,190 210,870 Project 4,480 520 010,1 14,900 <del>4</del> 1,295,050 1,241,120 653,450 3,620,680 15,000 21,430 2035 Project 4,530 1,325,280 1,420,250 835,040 217,620 4,023,500 790 1,070 50 225,310 1,262,000 14,610 20,310 203,000 793,000 117,000 2006 4,370 910 50 ,048,000 3,423,000 380 Roadway Lane Miles Total **Transit Seat Miles Total** Commuter Rail Transit Rapid Rail Transit Light Rail Transit Arterial / Other Mixed Flow **Mixed Flow** Ferry Transit ΤΟΗ//ΟΗ Expressways **Bus Transit** Freeways νон

Table 3.1-1: Roadway Lane Miles and Transit Seat Miles (2006 to 2035)

'AM peak period passenger seat miles per hour

Source: Metropolitan Transportation Commission, 2008

3.I-I4

Chapter 3.1: Alternatives to the Project

Table 3.1-2: Projected Changes in Travel Behavior

able 3.1-2. Frolected Chalikes III Travel Deliaviou	Idliges III I dv									
	2006	2035 Project	2035 No Project	Difference from Proposed Project	Heavy Maintenance/ Climate Protection	Difference from Proposed Project	Heavy Maintenance/ Climate Protection + Pricing	Difference from Proposed Project	Heavy Maintenance/ Climate Protection + Land Use	Difference from Proposed Project
Tribs by Means of Transportation <sup>a</sup>	ion <sup>a</sup>									and the second se
Auto	17,611,000	23,267,000	23,331,000	0.3%	23,331,000	0.3%	21,824,000	%9-	23,264,000	8
Transit	1,106,000	2,007,000	1,938,000	-3%	1,938,000	-3%	2,319,000	16%	2,098,000	5%
Bicycle	377,000	557,000	558,000	0.2%	558,000	0.2%	754,000	35%	598,000	7%
Walk	2,193,000	3,317,000	3,322,000	0.1%	3,322,000	0.1%	4,252,000	28%	3,666,000	
Total	21,287,000	29,148,000	29,148,000	0.0%	29,148,000	0.0%	29,148,000	%0	29,626,000	2%
Share of Tribs by Means of Transportation	ansportation									
Auto	83%	80%	80%		80%		75%		80%	
Transit	5%	7%	7%		%L		8%		7%	
Birvole	2%	2%	2%		2%		3%		2%	
Walk	10%	%11	%11		811		15%		13%	
Total	%00 I	%00 I	100%		%00 I		100%		102%	
Doily Transis Roardinge <sup>b</sup>	1 609.000	3.030.000	2.887.000	-5%	2,887,000	-5%	3,505,000	16%	3,090,000	2%
Daily Vehicle Trins <sup>c</sup>	16.932.000	23,246,000	23,282,000	0.2%	23,282,000	0.2%	22,106,000	-5%	23,123,000	<u>.</u>
Daily VMT	144,985,000	191,456,000	192,302,000	0.4%	192,302,000	0.0%	185,971,000	-3%	184,985,000	-3%
Daily VHD	762,000	1,153,000	1,789,000	55%	1,789,000	55%	1,512,000	31%	1,529,000	33%
Avg. Delay/Vehicle (Min)	2.7	3.0	4.6	53%	4.6	53%	4.I	37%	4.0	33%
*Excludes commercial and interregional trips	regional trips									
<sup>b</sup> Daily transit boardings includes transfer boardings	s transfer boarding	10								
'Includes interregional trips										
Source: Metropolitan Transportation Commission, 2008	on Commission, 200	8								

3.1-15

Table 3.1-3: Accessibility to Jobs (2006 to 2035)

							Heavy		Heavy	
				Difference	Heavy	Difference	Maintenance/	Difference	Maintenance/	Difference
				from	Maintenance/	from	Climate	from	Climate	from
		2035	2035 No	Proposed	Climate	Proposed	Protection +	Proposed	Protection +	Proposed
	2006	Project	Project	Project	Protection		Pricing	Project	Land Use	Project
Number of Total lobs Accessible by Auto	Accessible by	y Auto								
Wirhin 15 minutes	110.000	152,000	150,000	<u>%</u>	150,000	% -	154,000	2%	169,000	11%
Within 30 minutes	454.000	590,000	586,000	<u>-</u> %	586,000	*	607,000	3%	604,000	2%
Within 45 minutes		1,161,000	1,159,000	-0.1%	1,159,000	-0.1%	1,232,000	%9	1,209,000	4%
Number of Total lobs Accessible by Transit	Accessible b	y Translt								
Within 15 minutes	6.000	11,000	000'6	-13%	000'6	-13%	000'6	-12%	15,000	44%
Within 30 minutes	46,000	81,000	73,000	-10%	73,000	%0I-	73,000	-10%	000'06	12%
Within 45 minutes	139,000	228,000	213,000	-6%	213,000	%9-	217,000	-5%	244,000	7%
Source: Metrobolitan Transportation Commission, 2008	Isbortation Com	mission, 2008								

-E D D Source: Metropolitan

Chapter 3.1: Alternatives to the Project

Table 3.1-4: AM Peak Period<sup>I</sup> Regional Vehicle Miles Traveled (VMT) by Facility Type and Volume to Capacity (V/C) Ratio (2006 to 2035)

					Difference	Henw	Difference	Heavy Maintenance/	Difference	Heavy Maintenance/	Difference
					from	Maintenance/	from	Climate	from	Climate	from
				2035 No	Proposed	Climate	Proposed	Protection +	Proposed	Protection +	Proposed
V/C Ratio	<b>FOS</b> <sup>b</sup>	2006	2035 Project	Project	Project	Protection	Project	Pricing	Project	Land Use	rroject
Freeways <sup>a</sup>									dentration in a		
< 0.75	A-C	12,018,000	11,104,000	9,166,000	-17%	9,166,000	-17%	9,583,000	-14%	9,636,000	-13%
0.75 to 1.00	ц С	9.805,000	14,455,000	13,544,000	<b>%9-</b>	13,544,000	%9-	14,425,000	%0	13,799,000	-5%
00   ^	iL.	1.360.000	3,106,000	5,506,000	77%	5,506,000	77%	3,624,000	17%	4,060,000	31%
Total		23,183,000	28,664,000	28,217,000	-2%	28,217,000	-2%	27,632,000	-4%	27,495,000	-4%
Expresswavs and Arterials	ind Artei	rials									
< 0.75	A-C	A-C 10.774.000	13,135,000	13,427,000	2%	13,427,000	2%	13,053,000	*	13,328,000	≫
0.75 to 1.00	ц С	1.672.000	3,158,000	3,461,000	10%	3,461,000	201	3,103,000	-2%	3,328,000	5%
> 1 00	і 1 ц	127,000	598.000	738,000	24%	738,000	24%	583,000	-2%	452,000	-24%
Total		12,573,000	16,891,000	17,626,000	4%	17,626,000	4%	16,739,000	*	17,108,000	%
All Facilities								and and a set of the			
< 0.75	A-C	A-C 22.792.000	24,239,000	22,593,000	-7%	22,593,000	%/-	22,635,000	-7%	22,964,000	-5%
0.75 to 1.00	Ц. С	11.477.000	17,613,000	17,005,000	-3%	17,005,000	-3%	17,528,000	%0	17,126,000	-3%
00   <	і і ц	1.488.000	3,703,000	6,244,000	%69	6,244,000	%69	4,208,000	14%	4,512,000	22%
Total		35,756,000	45,555,000	45,843,000	1%	45,843,000	<u>*</u>	44,371,000	-3%	44,603,000	-2%
<sup>1</sup> AM peak period is four hours. *Freeways include Freeways an	d is four de Freew	hours. ays and Freeway	AM peak period is four hours. Freeways include Freeways and Freeway-to-Freeway connectors. Expressways and Arterials include all other facilities.	ors. Expressways	and Arterials in	clude all other faci	llities.				1 OC E

"Freeways include Freeways and Freeway-to-Freeway connectors. Expressways and Arterials include all other facilities. LOS - Level of Service measures traffic density in a range of A to F. LOS A are free-flow conditions with no delay; LOS D-E are more congested conditions with some delay possible; LOS F represents conditions of over-capacity and significant delay.

Source: Metropolitan Transportation Commission, 2008

3.1-17

Table 3.1-5: VMT per Capita

							Heavy		Lieuvy	
				Difference from	Heavy Maintenance/	Difference from	Maintenance/ Climate	Difference from	Maintenance/ Climate	Difference from
		2035	2035 No	Proposed	Climate	Proposed		Proposed	Protection +	Proposed
	2006	Project	Project	Project	Protection	Project		Project	Land Use	Project
VMT per Capita	20.3	21.2	21.3	0.5%	21.3	0.5%	20.6	-2.8%	20.3	-4.2%

Source: Metropolitan Transportation Commission, 2008

Chapter 3.1: Alternatives to the Project

#### **AIR QUALITY**

#### **Travel Data for Air Quality Analysis**

Table 3.1-6 shows the travel data used in this air quality analysis. Compared to the proposed Project, vehicles in use increase by 1 percent each under the No Project alternative and the Heavy Maintenance/Climate Protection Emphasis alternative but decrease by 3 percent each under the Heavy Maintenance/Climate Protection Emphasis + Pricing alternative and Heavy Maintenance/Climate Protection Emphasis + Land Use alternative. The amount of VMT (which is directly correlated to the projected population and job growth) mirrors these trends as well.

#### **Construction-Related Emissions**

Construction-related emissions due to the implementation of projects in the proposed Project and alternatives would constitute a direct but short-term impact as projects advance into construction, at different times, over the 25-year horizon. The proposed Project would have higher levels of construction-related emissions due to a larger supply of roadway and transit expansion projects that would be built compared to the alternatives. However, at the regional level, construction-related emissions from all alternatives are considered mitigable to a less than significant level.

#### **Criteria Pollutant Emissions**

Table 3.1-7 shows the emissions estimates from criteria pollutants for the proposed Project and alternatives. The level of emissions for criteria pollutants ROG,  $NO_x$ , and CO from motor vehicle sources would decrease substantially between 2006 and the 2035 horizon under the proposed Project. This emissions reduction is due to increasingly stringent emission controls CARB has adopted for new vehicle engines and fuels over the past few decades; as a result, the vehicle fleet gets "cleaner" over the next 25 years. However,  $PM_{10}$  and  $PM_{2.5}$  emissions from motor vehicle sources increase significantly compared to existing conditions.  $PM_{10}$ , which consists primarily of entrained road dust and vehicle emissions, correlates most closely to VMT growth.

Both the Heavy Maintenance/Climate Protection Emphasis + Pricing alternative and the Heavy Maintenance/Climate Protection Emphasis + Land Use alternative decrease the level of emissions for all criteria pollutants relative to the proposed Project. The Heavy Maintenance/Climate Protection + Pricing Emphasis alternative performs the best amongst the alternatives, resulting in roughly 3 percent lower levels of emission for each criteria pollutant compared to the proposed Project. The lower levels of emissions for these two alternatives can be attributed to fewer vehicles in use, lower levels of VMT, and less congested driving which has lower emissions impacts, as well as fewer engine starts because pricing strategies increase the cost of driving (thereby, reducing auto trips and increasing transit, walk and bike trips) and land use strategies balance jobs and housing and direct more jobs and housing developments near transit (thereby, reducing auto trips and increasing transit, walk and bike trips).

Both the No Project alternative and the Heavy Maintenance/Climate Protection Emphasis alternative slightly increase the level of emissions for all criteria pollutants compared to the proposed Project. This is because the proposed Project invests in more transit capacity, thereby reducing vehicle trips.

For  $PM_{10}$  and  $PM_{2.5}$  emissions from mobile sources, all alternatives have increased emission levels from existing conditions due to the projected increase in VMT, as vehicle travel disturbs dust on

local roads and freeways and produces more entrained dust. Given regional progress in lowering ground-level ozone (ROG,  $NO_x$ ) and carbon monoxide levels, differences in alternatives in 2035 are relatively small (less than 3 percent). Regarding particulate matter, the major increases are due to growth in regional travel between now and 2035, and differences between alternatives and the proposed Project are also small (less than 3 percent).

#### **Toxic Air Contaminant (TAC) Emissions**

As shown in Table 3.1-8, the levels of TAC emissions significantly decrease under the proposed Project compared to existing conditions mostly because of state laws and regulations aimed at identifying and reducing TACs such as standards for low emission vehicles, clean fuels, reformulated gasoline, diesel fuel specifications and CARB's Heavy Duty Diesel Inspection Programs.

Both the Heavy Maintenance/Climate Protection Emphasis + Pricing alternative and Heavy Maintenance/Climate Protection Emphasis + Land Use alternative slightly decrease the level of TACs emissions compared to the proposed Project (roughly 3 percent decrease). These emission reductions are largely attributable to the progress made at the state-level to address TACs and less so to the investments proposed in the Transportation 2035 Plan or the alternatives.

Both the No Project alternative and the Heavy Maintenance/Climate Protection Emphasis alternative slightly increase the level of TAC emissions compared to the proposed Project (roughly 2 percent increase). This is because the proposed Project invests more in transit capacity, thereby reducing vehicle use.

Chapter 3.1: Alternatives to the Project

Table 3. I-6: Travel Data

		-					Heavy		Heavy	
				Difference	Heavy	Difference	Maintenance/	Difference	Maintenance/	Difference
		2035		from	aint	from	Climate	from	Climate	from
		Probosed	2035 No	Proposed	Climate	Proposed	Protection +	Proposed	Protection +	Proposed
	2006	Project	Project	Project	đ	Project	Pricing	Project	Land Use	Project
Vehicles in Lice	4 847 000	6.694.000	6,729,000	~	6,729,000	~	6,497,000	-3%	6,509,000	-3%
		00	210,880,000	2	210.880.000	36	203,667,000	-3%	203,870,000	-3%
Daily VI'II, Adjusted			00017171			9	000 2 6 7 6 6	795	42 701 000	3%
Engine Starts	32,413,000	43,912,000	44,144,000	2	44,144,000	<b>१</b>	42,027,000	Rr.	0001101171	201
Total Population	7,159,000	9,031,000								
Total Employment	3,499,000	5,248,000								
	2000. Annualizion of Ray Area Covernments Projections 2007	7000. Association	of Bay Area Con	arnmante Proie	vetions 2007					

Source: Metropolitan Transportation Commission, 2008; Association of Bay Area Governments, Projections 2007

lay) Hervi	
eria Pollutants using EMFAC2007 Factors (tons per d	
Table 3.1-7: Emission Estimates for Crit	

							Heavy		Heavy	
				Difference		Difference	Maintenance/	Difference	Maintenance/	Difference
		2035	2035	from		from	Climate	from	Climate	from
		Proposed	No	Proposed		Proposed	Protection +	Proposed	Protection +	Proposed
	2006	Project	Project	Project		Project	Pricing	Project	Land Use	Project
ROG	131.1	37.2	37.5	0.7%	or rene-	0.7%	36.1	-3.0%	36.2	-2.7%
	209.8	42.8	43.2	0.8%	43.2	0.8%	41.6	-2.9%	41.7	-2.7%
ň c	1.235.4	268.7	272.3	1.3%		1.3%	261.5	-2.7%	262.7	-2.2%
M	65.7	84.I	84.7	0.7%	84.7	0.7%	81.7	-2.9%	81.8	-2.7%
PM. s	17.2	20.4	20.7	1.2%	20.7	1.2%	19.9	-2.8%	19.9	-2.4%
Source: Metropolitan Transportation Commission, 2008	ortation Commission	, 2008								

3.1-21

							Heavy		Heavy	
				Difference	Heavy	Difference	Maintenance/		Maintenance/	Difference
		2035		from	Maintenance/	from	Climate		Climate	from
		Proposed	2035 No	Proposed	Climate	Proposed	Protection +		Protection +	Proposed
	2006	Project	Project	Project	Protection	Project	Pricing		Land Use	Project
Diesel PM	3 073	716	728	1.6%	728	1.6%	697	-2.7%	698	-2.6%
	170	53	5	0.3%	53	0.3%	51	-3.8%	51	-3.5%
	1 2 8 4	115	316	1.7%	316	1.7%	301	-3.1%	310	-0.2%
benzene	107		212	2						
		0000 minimi								

Table 3.1-8: Emission Estimates for Mobile Source Air Toxic (MSAT) Pollutants (kilograms per day)

Source: Metropolitan Transportation Commission, 2008

Chapter 3.1: Alternatives to the Project

#### LAND USE AND HOUSING

#### Farmland

According to the GIS analysis methodology described in Chapter 2.3, each alternative has less of a potential impact on farmland than the proposed Project because the alternatives include fewer physical transportation improvements than the proposed Project.

- The No Project alternative could potentially affect about 260 acres of farmland through 31 projects in seven counties. Fourteen of the 31 are widening projects. Contra Costa County would be the most impacted under this alternative.
- The Heavy Maintenance/Climate Protection Emphasis alternative could potentially affect about 300 acres of farmland through 33 projects in all eight counties with farmland (San Francisco County has no farmland). Fourteen of the 33 are widening projects. Both Contra Costa and Santa Clara Counties would be the most impacted under this alternative.
- The Heavy Maintenance/Climate Protection Emphasis alternative variations with Land Use and Pricing Strategies have the potential to affect approximately the same amount of farmland as the basic Heavy Maintenance/Climate Protect Emphasis alternative, when considering strictly the program of physical improvements. However, considering the potential cumulative impact of land use regulations for development around transportation infrastructure, it is reasonable to suppose that the Heavy Maintenance/Climate Protection Emphasis + Land Use alternative that increases density and directs growth toward transit might also reduce its cumulative farmland impacts relative to all other alternatives.

Туре	2035 Proposed Project	No Project	% Diff.	Heavy Maint/ Climate Protection	% Diff:	Heavy Maint/ Climate Protection + Pricing	% Diff.	Heavy Maint/ Climate Protection + Land Use	% Diff.
Prime	290	56	-81%	56	-81%	56	-81%	56	-81%
Statewide Importance	44	31	-30%	31	-30%	31	-30%	31	-30%
Local Importance	237	37	-84%	37	-84%	37	-84%	37	-84%
Grazing	802	135	-83%	168	-79%	168	-79%	168	-79%
Unique	24	4	-83%	4	-83%	4	-83%	4	-83%
Total Farmland	1,397	263	-81%	295	-79%	295	-79%	295	-79%

#### Table 3.1-9: Type and Amount of Farmland Potentially Affected by 2035 Alternatives (Acres)

Note: The Heavy Maintenance/Climate Protection Emphasis alternative would impact slightly more grazing land than the No Project alternative, but the calculated difference is minimal and due primarily to GIS portrayal of road widening and intersection realignments.

Source: Dyett & Bhatia, 2008

#### Long Term Urban Land Use Divisions/Displacement

Each alternative has less potential to divide or displace existing urban land uses than the proposed Project (as shown in Table 3.1-10) primarily because the alternatives include fewer physical transportation improvements (notably expansions and extensions) than the proposed

Project. In the proposed Project and all alternatives, employment areas would be relatively more affected by land use displacement than residential areas and urban open space, because the land adjacent to major roads is generally more likely to be non-residential than residential, so changes to those roads affect employment uses first.

- The No Project alternative would impact significantly fewer existing land uses than the proposed Project only about 200 acres in seven counties. Sixty percent of the potential impacts will occur in employment areas, with the rest occurring equally in residential and open space areas.
- The Heavy Maintenance/Climate Protection Emphasis alternative would impact significantly fewer existing land uses than the proposed Project about 300 acres in eight counties. Most of those impacts will occur in employment and residential areas.
- The Heavy Maintenance/Climate Protection Emphasis alternative variations with Land Use and Pricing Strategies have the potential to affect approximately the same amount of existing urban land uses as the basic Heavy Maintenance/Climate Protect Emphasis alternative, when considering strictly the program of physical improvements. However, considering the potential cumulative impact of land use regulations for development around transportation infrastructure, it is reasonable to suppose that the Heavy Maintenance/Climate Protection + Land Use alternative that increases density and directs regional growth toward transit might also increase cumulative urban land disruption relative to other alternatives due to increased infill in urban areas where there are more existing land uses to disturb.

Land Use	Proposed Project	No Project	Heavy Maintenance/ Climate Protection	Heavy Maintenance/ Climate Protection + Pricing	Heavy Maintenance/ Climate Protection + Land Use
Employment Areas	920	123	137	137	37
Residential	701	40	115	115	115
Urban Open Space	533	42	53	53	53
Total	2,154	205	304	304	304

Table 3.1-10: Communit	/ Land Use Acres Potentiall	y Affected by 2035 Alternatives
------------------------	-----------------------------	---------------------------------

Note: the Heavy Maintenance/Climate Protection Emphasis alternative has somewhat more potential to disrupt or displace existing urban land uses than the No Project alternative, but the calculated difference is minimal and is mostly due to GIS portrayal of road widening and intersection realignments.

Source: Dyett & Bhatia, 2008

#### **Short-Term Community Disruption**

Compared to the proposed Project, each of the alternatives involves substantially less new construction activity. The major investments within the alternatives relate to improving capacity through maintenance of current roadways rather than creating new capacity through new roadway projects. Nonetheless, even in the alternatives there is a potential for intermittent disruption of normal activities in adjacent neighborhoods and communities since some of alternatives include road realignment, repaving, or widening.

• The No Project alternative may result in some short-term community disruption, as it assumes construction of projects with currently committed funding. The impacts may include noise, dust, traffic delays, loss of vegetation due to earth moving, and other

Chapter 3.1: Alternatives to the Project

temporary impacts due to construction work. However, it would still likely have fewer shortterm disruption impacts than the proposed Project.

- The Heavy Maintenance/Climate Protection Emphasis alternative could have slightly more construction-related short-term impact than the No Project alternative due to a few additional projects in the network that involve road widening and intersection realignment. However, it would still likely have fewer short-term disruption impacts than the proposed Project.
- The Heavy Maintenance/Climate Protection Emphasis + Pricing alternative would have a similar level of construction-related impacts as the Heavy Maintenance/Climate Protection Emphasis alternative in noise, dust, loss of vegetation, and other short term environmental impacts. The negative impact on local traffic, however, may be relatively lower. Combating increased traffic on some lanes due to road closure for construction work, traffic may be reduced due to the implementation of pricing strategies. People may carpool, or try to avoid rush-hour traffic in response to the increased cost of driving. This alternative would likely have fewer short-term impacts than the proposed Project.
- The Heavy Maintenance/Climate Protection Emphasis + Land Use alternative would have a similar level of construction-related impacts as the Heavy Maintenance alternative in noise, dust, traffic delays, loss of vegetation, and other short term environmental impacts. From the cumulative perspective, it is possible that increased urban infill development may result in slightly more short-term disruption of existing communities compared to the other alternatives, due to slightly more local construction efforts beyond the transportation improvements themselves. This alternative would likely have fewer short-term impacts than the proposed Project.

In conclusion, the No Project alternative would likely cause the least amount of long-term physical disruption in both farmland and urban land uses, primarily because it provides for the fewest physical improvements. The Heavy Maintenance/Climate Protection Emphasis + Land Use alternative would rank second best when looking at farmland impacts, but it also has more potential to disrupt existing communities through cumulative indirect effects of a land use regulatory structure that encourages redevelopment of downtowns and transit areas.

#### **Consistency with Local Plans**

As projects are evaluated at the local level before they are proposed to MTC for inclusion in the RTP, it is reasonable to assume that component projects are consistent with applicable local general plans and transportation plans. The Heavy Maintenance/Climate Protection Emphasis + Land Use alternative, however, uses a different underlying land use forecast than the proposed Project and the rest of the other alternatives. This alternative forecast assumes a different distribution of population and employment growth such that higher densities are achieved in the region's existing cities as compared to *Projections 2007*. Thus, this forecast is likely different than what is currently contained in local general plans. In other words, the overall population and employment growth would take place with less expansion of urban land. Table 3.1-11 shows the difference in acres by regional land use projection (please note: ABAG's *Projections 2007* is used in the proposed Project, the No Project, the Heavy Maintenance/Climate Protection Emphasis alternative, and the Heavy Maintenance/Climate Protection Emphasis + proposed Project, and the Heavy Maintenance/Climate Protection Emphasis alternative, and the Heavy Maintenance/Climate Protection Emphasis + across transportation networks).

By way of example, the combined residential, commercial, and industrial land use acreages for Alameda County show 4,024 fewer urban acres if the Heavy Maintenance/Climate Protection Emphasis + Land Use alternative is adopted compared to all other alternatives (the proposed Project, the No Project, the Heavy Maintenance/Climate Protection Emphasis alternative and the Heavy Maintenance/Climate Protection Emphasis + Pricing alternative) which are assumed to be consistent with *Projections 2007*. This simply shows that more people and economic activity would be expected on existing developed land under those alternative projections. Therefore, adopting the Heavy Maintenance/Climate Protection Emphasis + Land Use alternative could introduce more inconsistencies with local plans. These inconsistencies, though, would gradually fade if local jurisdictions update their land use policies over time to accommodate the regional planning efforts of MTC and its partner agencies.

Table 3.1-11: Regional Projections Comparison, Residential/Commercial/Industrial Acres	Table 3.1-11: Regional Projections (	Comparison,	Residential/Commercial/Industrial Acres
----------------------------------------------------------------------------------------	--------------------------------------	-------------	-----------------------------------------

Bay Area	840,128	926,309	903,400	10.3%	-2.5%
Sonoma	179,610	192,636	191,206	7.3%	-0.7%
Solano	71,098	83,330	76,933	17.2%	-7.7%
Santa Clara	165,350	177,928	178,282	7.6%	0.2%
San Mateo	85,770	90,198	90,000	5.2%	-0.2%
San Francisco	15,401	I 5,887	15,905	3.2%	0.1%
Napa	23,959	26,596	26,421	11.0%	-0.7%
Marin	39,671	42,453	43,512	7.0%	2.5%
Contra Costa	120,961	142,717	130,601	18.0%	-8.5%
Alameda	138,308	154,564	150,540	11.8%	-2.6%
County	Existing Conditions (2006)	All 2035 Alternatives Using ABAG Projections 2007	2035 Heavy Maintenance/ Climate Protection + Land Use	% Change, 2006 to 2035 for All Alternatives Using ABAG Projections 2007	% Difference, Land Use Alternative Projection Compared to ABAG Projections 2007

Source: Metropolitan Transportation Commission Data Summary, 2007

Chapter 3.1: Alternatives to the Project

#### ENERGY

The Heavy Maintenance/Climate Protection Emphasis + Pricing alternative would result in the lowest consumption of energy for transportation and the greatest reduction in transportation energy use from baseline conditions (see Table 3.1-12). This is primarily due to reduced congestion which results in increased fuel efficiency of vehicles. Transportation energy consumption for the Heavy Maintenance/Climate Protection Emphasis + Land Use alternative would be less than 1 percent greater than that of the Heavy Maintenance/Climate Protection + Pricing alternative, representing the reduction in VMT associated with proximity of housing, jobs, and other land uses, but slightly less fuel efficiency than that which results from pricing strategies. The proposed Project would result in transportation energy use about 3 percent greater than the Heavy Maintenance/Climate Protection + Pricing alternative, but would still use nearly 28 percent less transportation energy than baseline conditions.

The No Project alternative and the Heavy Maintenance/Climate Protection Emphasis basic alternative would both result in greater consumption of transportation energy than either the proposed Project or the Heavy Maintenance/Climate Protection Emphasis alternative Land Use and Pricing variations, but still 27 percent less than under baseline conditions, due to more efficient on-road vehicles that are assumed by 2035 as a result of the state's Pavley rules regarding vehicle emissions (see also  $CO_2$  discussion), which would more than offset increased vehicle miles traveled under all future conditions.

			-		Heavy	Heavy
				Heavy	Maintenance/	Maintenance/
				Maintenance/	Climate	Climate
		Proposed	No	Climate	Protection +	Protection +
	2006	Project	Project	Protection	Land Use	Pricing
On-Road Vehicles	1,150.6	971.0	989.8	989.8	952.4	943.7
Transit Vehicles	27.5	39.3	37.2	37.2	39.0	39.0
Direct Energy Total	1,178.2	1,010.2	1,027.0	1,027.0	991.5	982.7
Manufacturing and Maintenance	249.1	321.7	322.7	322.7	312.8	312.5
Construction		21.8	10.6	10.6	18.4	18.4
Indirect Energy Total	249.1	346.6	333.3	333.3	331.2	330.9
Total Daily Energy	1,427.8	1,353.8	1,360.3	1,360.3	1,322.7	1,313.7
Percent Change from Baseline		(5.1%)	(4.7%)	(4.7%)	(7.3%)	(8.0%)
Percent Change from No Project		(0.5%)	_	-	(2.8%)	(3.4%)
Percent Change from Project		_	0.5%	0.5%	(2.3%)	(3.0%)
Per Capita Daily Energy (BTU)	199,358	149,906	150,627	150,627	146,463	145,464
Percent Change from Baseline	-	(24.8%)	(24.4%)	(24.4%)	(26.5%)	(27.0%)
Percent Change from No Project	_	(0.5%)			(2.8%)	(3.4%)
Percent Change from Project			0.5%	0.5%	(2.3%)	(3.0%)
BTU: British Thermal Unit						

#### Table 3.1-12: Daily Direct and Indirect Energy Consumption Comparison (Billions of BTUs)

Source: Environmental Science Associates, 2008; Metropolitan Transportation Commission Model Outputs, 2008

#### **CLIMATE CHANGE AND GREENHOUSE GASES**

#### **Carbon Dioxide Emissions**

Overall, the implementation of AB 1493 (Pavley) is the primary reason why  $CO_2$  emissions decline from existing conditions to 2035 for all alternatives.

As shown in Table 3.1-13, a comparison of the alternatives to the proposed Project concludes that the Heavy Maintenance/Climate Protection Emphasis + Pricing alternative is estimated to produce the lowest levels of daily carbon dioxide emissions, followed by the Heavy Maintenance/Climate Protection Emphasis + Land Use alternative, both of which perform better than the proposed Project. The relative improved performance of the Heavy Maintenance/Climate Protection Emphasis + Pricing alternative is a result of the pressure of high driving cost reducing VMT overall, as well as the pressures of high driving cost reducing congestion in particular parts of the transportation system. The result of the modeling suggests that pricing is particularly effective at changing driving activity. The relative improvement of the Heavy Maintenance/Climate Protection + Land Use alternative is a result of increased non-auto mode share due to proximity of homes to jobs and essential services. This result suggests that land use also plays a substantive role in changing driving behaviors.

Notably, the No Project and Heavy Maintenance/Climate Protection Emphasis alternatives do not display improvement from the proposed Project. This is because:

- The No Project and Heavy Maintenance/Climate Protection alternatives share a "no expansion" strategy. The transit and roadway supplies are lower under both alternatives compared to the proposed Project. The smaller network makes it more difficult for these alternatives to meet the needs of future regional growth and travel demand and results instead in greater congestion and delay;
- Investments like the Freeway Performance Initiative and Regional HOT Network that are effective on reducing vehicle delay, particularly on freeways, are excluded under both alternatives; and
- Without additional land use or pricing influences, the reduced transportation network has both more congestion and fewer incentives/opportunities to switch from autos to transit, bicycle, and pedestrian modes.

Thus, while the Heavy Maintenance/Climate Protection Emphasis alternative was designed to channel funding toward the existing system, including reducing transit operating shortfalls and supporting walking and biking programs and infrastructure, the modeling suggests that these infrastructure choices alone are not enough to substantially change driving behaviors and thus greenhouse gas emissions. Rather, other approaches such as pricing and land use change must be used in conjunction with infrastructure to make a large reduction in VMT and congestion.

Table 3.1-13: C0<sub>2</sub> Emissions

							Heavy		Heavy	
					Heaw		Maintenance/		Maintenance/	
				Difference	Maintenance/	-		Difference	Climate	4
			2035	from	Climate			from	Protection	
		2035	٩	Proposed	Protection			Proposed	Emphasis +	
	2006	Project	Project	Project	Emphasis			Project	Land Use	- 1
CO3 Emissions with Pavlav Land II	89.6	75.6	77.1	1.9%	77.1	17.2		-2.8%	74.2	
	89.6	83.9	85.6	2.0%	85.6			-2.8%	80.1	
	89.6	113.6	116.0	2.1%	116.0	2.1%	110.5	-2.7%	111.6	
CO2 Emissions without raviey	914	77.	78.6	.9%	78.6			-2.8%	75.6	
CO2 Equivalent Ennissions with rave rand r	91.4	85.6	87.3	2.0%	87.3	2.0%	83.2	-2.8%	81.7	
CO2 Equivalent Emissions without Pavley I or II	91.4	115.9	_	2.1%	118.3	2.1%	112.7	-2.7%	113.8	-1.8%

Source: Metropolitan Transportation Commission, 2008

Chapter 3.1: Alternatives to the Project

#### Sea Level Rise

Sea level rise that could occur as a result of global climate change is likely to have widespread effects on coastal structures, infrastructure, beaches, wetlands, and agricultural lands. Many of the region's most significant transportation corridors and sites are located along the San Francisco Bay shoreline and, as a result, are already vulnerable to projected sea level rise and storm surge. Future investment in transportation improvements—particularly new infrastructure or increased capacity—along these same corridors is likely to increase overall system vulnerability to sea level rise and storm surge. The contributing factors to the cumulative impact are true for all alternatives. At the same time, the mitigation measures which include planning for infrastructure protection, investments in vulnerability analysis, and exploring the potential for important realignments, also apply to all alternatives.

It seems reasonable to expect that the proposed Project, with the largest amount of new physical construction, would contribute the largest increase in vulnerability to the cumulative effect relative to the other alternatives. On the other hand, it is also reasonable to expect that the Heavy Maintenance/Climate Protection Emphasis + Land Use alternative, with its adjusted development projections moving population even farther in toward urban areas along the coast and Bay margins, would by nature increase vulnerability of communities and infrastructure to sea level rise in comparison to alternatives based on Projections 2007. Furthermore, the alternative with the best transportation functionality (e.g. lowest congestion, fastest average speeds, and most connectivity) might prove to be the least vulnerable because it can best handle localized storm surge inundation by redistributing traffic among other parts of the system. In that case, the propose Project or the Heavy Maintenance/Climate Protection Emphasis + Pricing variation would be preferred alternatives to reduce vulnerability to sea level rise. Considering each of these factors, the least preferable would seem to be the No Project alternative because it suffers from the same cumulative vulnerability due to population growth while contributing little to no new investment in climate protection programs, critical retrofits and renovations, or system functionality improvements.

In summary, the environmentally preferable alternative for GHG emissions could be either Heavy Maintenance/Climate Protection Emphasis + Land Use alternative or the Heavy Maintenance/Climate Protection + Pricing alternative. The other alternatives seem to perform somewhat less well than the proposed Project. In terms of sea level rise, the environmentally preferable alternative would likely be the Heavy Maintenance/Climate Protection Emphasis + Pricing alternative. All other alternatives seem to perform somewhat less well than the proposed Project.

Chapter 3.1: Alternatives to the Project

#### NOISE

As shown in Table 3.1-14, each of the alternatives would result in an increase in the overall percentage of regional roadway miles exposed to noise levels at or above 66 dBA, compared to baseline (2006) conditions. The smallest increase in roadway miles exposed 66 dBA or greater noise levels would occur under the proposed Project (7.5 percent), while the No Project alternative and Heavy Maintenance/Climate Protection Emphasis alternative would result in a 9.4 percent increase, and the Heavy Maintenance/Climate Protection Emphasis + Pricing alternative and Heavy Maintenance/Climate Protection + Land Use alternative would result in increases of 8.3 percent and 8.2 percent, respectively. Thus, on a regional basis, the proposed Project would result in the least severe increase in 66 dBA or greater noise levels. Similar relationships between alternatives would prevail at the county level, although there would be some exceptions: for example, the Heavy Maintenance/Climate Protection Emphasis + Land Use and Pricing alternatives would result in fewer miles exposed to 66 dBA or greater on Santa Clara County expressways than the proposed Project, the No Project, or the Heavy Maintenance/Climate Protection Emphasis basic alternative, while Napa County arterials would fare best with the Heavy Maintenance/Climate Protection Emphasis + Pricing alternative and worst with the proposed Project. In terms of roadway miles that would experience a significant increase (3 dBA or more) in noise levels compared to baseline conditions, the proposed Project would likewise result in the smallest increase on a regional basis, followed by the Heavy Maintenance/Climate Protection Emphasis + Land Use and Pricing alternatives.

The No Project alternative and the Heavy Maintenance/Climate Protection Emphasis alternative would see the greatest increase in roadway miles that would experience a 3 dBA or more increase in noise (see Table 3.1-15). As in the prior table's comparison, the same relationships would hold, for the most part, on a county-by-county basis. As with the proposed Project, noise effects of each alternative, while potentially significant, would be able to be mitigated to a less-than-significant level with mitigation measures identified in Chapter 2, with the exception of effects due to cumulative increases in traffic noise due to each alternative and the effects of growth due to implementation of other regional and local land use policies and plans. This latter, cumulative impact would be significant and unavoidable for each of the alternatives, as it would for the proposed Project. Also as with the proposed Project, construction noise effects would be expected to be less than significant, and would be incrementally less severe under each of the alternatives, compared to conditions with the proposed Project, because fewer construction projects would be undertaken.

Chapter 3.1: Alternatives to the Project

al Miles > 66 dBA NAC Level, and Total Directional Miles, by Roadway Type and County ċ ÷ 14.00

Table 2 I.	Table 2 1.14: Roadway Directional Miles >	Directic	nal Mile	es > 66	dBA NA	VC Leve	il, and I	OTAI LII	ecciona	11 ['IIICS'	66 dBA NAC Level, and I otal Directional Miles, by Nuauway 1 ype and Councy	- Aman	The min				
		Year 2	Year 2006. Base Yea	Year	Year	Year 2035, Project	ject	Year 2	Year 2035, No Project	roject	Diff. from Project	n Project	Hvy. Mai	Hvy. Maint./Climate Protect	e Protect	Diff. from Project	n Project
County	Roadway Tuhe	# over 66 dBA	Total	% over 66 dBA	# over 66 dBA	Total	% over 66 dBA	# over 66 dBA	Total	% over 66 dBA	# over 66 dBA	% over 66 dBA	# over 66 dBA	Total	% over 66 dBA	# over 66 dBA	% over 66 dBA
	246.		C	100.0%	5	55	100.0%	53	53	1 00.0%	-2	0.0%	53	53	100.0%	-2	0.0%
San Francisco	Freeways	<u>.</u>	; ;	100.0%	1 0	2	100.0%	2	2	100.0%	0	0.0%	2	2	100.0%	0	0.0%
	Expressways	7 281	2 2	28.9%	228	633	36.0%	236	635	37.2%	8	1.2%	236	635	37.2%	8	1.2%
March March	Arteriais	167	021	98.5%	168	170	%0.66	168	170	99.2%	0	0.3%	168	170	99.2%	0	0.3%
San Mateo	Freeways	66	31	92.0%	29	31	92.8%	29	31	92.8%	0	0.0%	29	ЭI	92.8%	•	0.0%
	Arteriale	776	1.068	25.8%	360	1,070	33.6%	371	1,068	34.7%	=	.1%	371	1,068	34.7%	-	1.1%
Carl) Hard	Freewove	325	328	99.2%	323	326	99.2%	324	326	99.4%	1	0.2%	324	326	99.4%	-	0.2%
Jaille Cial a	Evenerates	061	233	81.8%	224	235	95.4%	217	235	92.5%	2-	-2.9%	217	235	92.5%	L-	-2.9%
	Amoriale	645	2.066	32.2%	877	2,083	42.1%	921	2,077	44.3%	44	2.2%	921	2,077	44.3%	4	2.2%
		POC POC	304	100.0%	305	305	100.0%	305	305	100.0%	0	0.0%	305	305	100.0%	•	0.0%
Alameda	L'reeways	Per l	40	841%	4	45	91.2%	36	6	90.7%	4	-0.5%	36	40	90.7%	4	-0.5%
	Expressways		1 BUS	34.7%	162	1.830	43.2%	826	1,829	45.2%	35	1.9%	826	1,829	45.2%	35	1.9%
	Arteriais		701	200 B%	184	184	99.8%	184	184	99.8%	0	0.0%	184	184	8.66	0	0.0%
Contra	rreeways	101	101 10	45.1%	33	52	61.8%	36	50	72.2%	4	10.4%	36	50	72.2%	4	10.4%
Costa	Expressways	01	1 540	30.05	659	1.606	41.0%	688	1,598	43.1%	29	2.0%	688	1,598	43.1%	29	2.0%
	Arteriais	À F	2	00 00	12	174	%0.66	172	174	99.0%	0	0.0%	172	174	%0.66	•	0.0%
Solano	Freeways	7/1	±/-	%0.77 %7 CQ	2 5		72.3%	52	64	82.0%	0	9.7%	52	64	82.0%	•	9.7%
	Expressways	47	00 VCL	%r:70	250	741	33.8%	268	734	36.5%	17	2.7%	268	734	36.5%	17	2.7%
	Arteriais	2		N0 001	907	24	100.0%	24	24	100.0%	0	0.0%	24	24	100.0%	0	0.0%
Napa	rreeways r	F2 75	1.7	%0.001	37	37	100.0%	37	37	100.0%	0	0.0%	37	37	100.0%	•	0.0%
	Expressways Artariale		484	16.7%	Ξ	489	22.8%	109	484	22.5%	-2	-0.2%	601	484	22.5%	-2	-0.2%
	Eroever	12	132	100.0%	132	132	100.0%	132	132	%0.001	•	0.0%	132	132	100.0%	•	0.0%
PHIODOC	Evenessmore	00	20	100.0%	20	20	100.0%	20	20	100.0%	•	0.0%	20	20	100.0%	•	0.0%
	Amoriale	2 12	112	30.4%	433	1,167	37.1%	492	1,160	42.4%	59	5.3%	492	1,160	42.4%	59	5.3%
		4	14	100.0%	12	11	100.0%	11	11	1 00.0%	0	0.0%	77	11	100.0%	•	0.0%
14arin	Artarials	110	559	19.7%	124	559	22.1%	135	559	24.1%	11	2.0%	135	559	24.1%	11	2.0%
B Auto	Fragmore	1 438	1.445	99.5%	1,440	1,446	%9.66	1,439	1,444	89.6%	7	0.1%	1,439	1,444	%9.66	ī	0.1%
Ddy MICA	Freeways	379	450	84.2%	437	494	88.5%	430	479	89.8%	2-	1.3%	430	479	89.8%	5-	1.3%
	Ameriale	21918	10.050	29.0%	3,834	10,179	37.7%	4,047	10,144	39.9%	213	2.2%	4,047	10,144	39.9%	213	2.2%
		4 725	11 945	39.6%	5.711	12.119	47.1%	5,916	12,067	49.0%	205	1.9%	5,916	12,067	49.0%	205	%6.1
	Complified	22214E															

3.1-32

Conclusions
<b>CEQA-Required</b>
and
Alternative
Three:
Part

Chapter 3.1: Alternatives to the Project

66         # over dBA           0.00%         0.00%           0.00%         0.00%           0.00%         0.00%           1.6%         0.00%           0.00%         0.00%           0.00%         0.00%           0.00%         0.00%           0.00%         0.00%           0.00%         0.00%           0.00%         0.00%           0.00%         0.00%           0.00%         0.00%           0.00%         0.00%           0.00%         0.00%           0.00%         0.00%           0.00%         0.00%           0.00%         0.00%           0.00%         0.00%           0.00%         0.00%	1 auto sile i		Line MA	int ICP + I and	1 ke	Hw. Maint ICB + I and I lee Diff. from Project Hw. Maint IC	Project	Hw.	Hvy. Maint/CP + Pricing	ricing	Diff. from Project	Project
Focking/Type         Form         Manuality         Total         Manuality         Manuality<			עאזי יאים	ווור/רו רחומ	0.0	1 10	of more AA	# over 66		% over 66	# over 66	% over 66
Freewoys         53         100 0%         23         100 0%         23           Freewoys         2         0.00 %         2         0.00 %         2         0.00 %         2           Freewoys         2         0.00 %         2         3.53         3.53 %         2         0.00 %         2           Freewoys         1         31         94 %         2         0.37 %         359         95 %         10           Freeworks         31         36         95 %         1         0.35 %         359         95 %         1           Freeworks         31         36         95 %         1         0.35 %         359         95 %         1           Freeworks         31         365         95 %         1         0.35 %         36         95 %         1           Freeworks         31         365         95 %         36         36         96 %         1         1           Freeworks         31         36         95 %         36         36         36         36         36         36         36         36         36         36         36         36         36         36         36         36	County	Roadway Type	# over 66 dBA	Total	76 over oo dBA	H UNEL DO	dBA	dBA	Total	dBA	dBA	dBA
Freeworks         2         2         0.000K         0         0.00K         2         3.33K         0         0         0         0         0         0         0         0         0         0         0         0         0         0         0         0         0         0         0         0         0         0         0         0         0         0         0         0         0         0         0         0         0         0         0         0         0         0         0         0         0         0         0         0         0         0         0         0         0         0         0         0         0         0         0         0         0         0         0         0         0         0         0         0         0         0         0         0         0         0         0         0         0         0         0         0         0         0         0         0         0         0         0         0         0         0         0         0         0         0         0         0         0         0         0         0         0         0				53	100.0%	-2	0.0%	53	53	100.0%	-5	\$0.0%
Derresonys         2         0.3         3.4.3         -10         -           Intervols         2         6.5         3.6.3         3.6.3         3.6.3         3.6.3         3.6.3         -10         -90.0%         0         90.0%         0         90.0%         0         90.0%         0         90.0%         0         90.0%         0         90.0%         0         90.0%         0         90.0%         0         90.0%         0         90.0%         0         90.0%         0         90.0%         0         90.0%         0         90.0%         0         90.0%         0         90.0%         0         90.0%         0         90.0%         0         90.0%         0         90.0%         0         90.0%         0         90.0%         0         90.0%         0         90.0%         0         90.0%         0         90.0%         10         90.0%         10         90.0%         10         90.0%         10         90.0%         10         90.0%         10         90.0%         10         90.0%         10         90.0%         10         90.0%         10         10         90.0%         10         10         90.0%         10         90.0% <t< td=""><td>San Francisco</td><td>Freeways</td><td></td><td>; (</td><td>%0 00 I</td><td>0</td><td>%0.0</td><td>2</td><td>2</td><td>100.0%</td><td>0</td><td>0.0%</td></t<>	San Francisco	Freeways		; (	%0 00 I	0	%0.0	2	2	100.0%	0	0.0%
Arterials         2.0         2.0         2.0         2.0         2.0         2.0         2.0         2.0         2.0         2.0         2.0         2.0         2.0         2.0         2.0         2.0         2.0         2.0         2.0         2.0         2.0         2.0         2.0         2.0         2.0         2.0         2.0         2.0         2.0         2.0         2.0         2.0         2.0         2.0         2.0         2.0         2.0         2.0         2.0         2.0         2.0         2.0         2.0         2.0         2.0         2.0         2.0         2.0         2.0         2.0         2.0         2.0         2.0         2.0         2.0         2.0         2.0         2.0         2.0         2.0         2.0         2.0         2.0         2.0         2.0         2.0         2.0         2.0         2.0         2.0         2.0         2.0         2.0         2.0         2.0         2.0         2.0         2.0         2.0         2.0         2.0         2.0         2.0         2.0         2.0         2.0         2.0         2.0         2.0         2.0         2.0         2.0         2.0         2.0         2.0         2		Expressways	7 VEC	- 435	36.3%	2	0.3%	218	635	34.3%	01-	-1.7%
Freewoys         10         11         94.4.         2         5.7.4         234         313.5.         0         234.5.         0         234.5.         0         234.5.         0         234.5.         0         234.5.         0         234.5.         0         234.5.         0         234.5.         0         234.5.         0         234.5.         0         234.5.         234.5.         234.5.         234.5.         234.5.         234.5.         234.5.         234.5.         234.5.         234.5.         234.5.         234.5.         234.5.         234.5.         234.5.         234.5.         234.5.         234.5         234.5         234.5         234.5         234.7         234.7         234.7         234.7         234.7         234.7         234.7         234.7         234.7         234.7         234.7         234.7         234.7         234.7         234.7         234.7         234.7         234.7         234.7         234.7         234.7         234.7         234.7         234.7         234.7         234.7         234.7         234.7         234.7         234.7         234.7         234.7         234.7         234.7         23		Arterials	071	021	%0.66	0	0.1%	168	170	%0.66	0	0.0%
Expressions         30         10.6         5.5.4         20         2.06         335         10.6         333         4         -           Freeworks         324         326         95.5         1         0.35         324         326         95.45         1           Freeworks         324         325         95.5         12         135         305         10.05         10           Freeworks         305         10.05         0         0.55         305         10.05         10           Freeworks         305         10.05         0         0.05         305         100.05         1           Freeworks         305         10.05         0         0.05         305         305         100.05         1           Freeworks         31         14         95.55         31         1.35         1.4         9         1         1         1         9         1         1         1         1         1         1         1         1         1         1         1         1         1         1         1         1         1         1         1         1         1         1         1         1         1	San Mateo	Freeways	001		98.4%	2	5.7%	29	31	92.8%	0	0.0%
Arterials         300         1.000         32.44         32.44         32.44         32.44         32.44         32.44         32.44         32.44         32.44         32.44         32.44         32.44         32.44         32.44         32.44         32.44         32.44         32.44         32.44         32.44         32.44         32.44         32.44         32.44         32.44         32.44         32.44         32.44         32.44         32.44         32.44         32.44         32.44         32.44         32.44         32.44         32.44         32.44         32.44         32.44         32.44         32.44         32.44         32.44         32.44         32.44         32.44         32.44         32.44         32.44         32.44         32.44         32.44         32.44         32.44         32.44         32.44         32.44         32.44         32.44         32.44         32.44         32.44         32.44         32.44         32.44         32.44         32.44         32.44         32.44         32.44         32.44         32.44         32.44         32.44         32.44         32.44         32.44         32.44         32.44         32.44         32.44         32.44         32.44         32.44         <		Expressways			35.5%	00	2.0%	356	1,068	33.3%	4	-0.3%
Freeworks         3.14         3.26         0.57k         -10         -1,35k         0.57k         -10         -10         -10         -10         -10         -10         -10         -10         -10         -10         -10         -10         -10         -10         -10         -10         -10         -10         -10         -10         -10         -10         -10         -10         -10         -10         -10         -10         -10         -10         -10         -10         -10         -10         -10         -10         -10         -10         -10         -10         -10         -10         -10         -10         -10         -10         -10         -10         -10         -10         -10         -10         -10         -10         -10         -10         -10         -10         -10         -10         -10         -10         -10         -10         -10         -10         -10         -10         -10         -10         -10         -10         -10         -10         -10         -10         -10         -10         -10         -10         -10         -10         -10         -10         -10         -10         -10         -10         -10		Arterials	000	200	00 59	-	0.3%	324	326	99.4%	1	0.2%
Expressions/s         2.13         2.23         0.00%         30         1.6%         39.4         2.077         4.3.0%         1.7           a         Freeways         315         100%         0.00%         0.00%         305         100%         0         0         2.07         4.3.0%         1           Arrenais         305         305         100%         0.00%         305         13.%         0         0.7%         4.4         1.8         9.9%         1.4           Arrenais         305         18.9         95.%         1.3%         80.0         1.8         9.9%         1.4         1.4           Freeways         31         1.50         31.5%         1.5%         5.6         1.6%         5.6         1.8         9.9%         1.4         1.1           Freeways         631         1.590         39.5%         2.1         1.0%         2.63         1.3         9.0%         1.4         1.1           Freeways         631         1.590         39.5%         2.12         7.24         2.1         1.1         1.1         1.1         1.1         1.1         1.1         1.1         1.1         1.1         1.1         1.1         1.1	Santa Clara	Freeways	47 C	320	%C.17	- 1-	4.9%	215	235	91.4%	-10	4.1%
Arterials         No $M_{12}$ No $M_{12}$ $M_{1$		Expressways	512	770 0	%2.07	. 8	1.6%	894	2,077	43.0%	17	0.9%
a         Freewoys         3/3         4/3         5/3         4/3         1/3         3/3         4/3         4/3         1/3         3/3         4/3         4/3         4/3         4/3         4/3         4/3         4/3         4/3         4/3         4/3         4/3         4/3         4/3         4/3         4/3         4/3         1/3         4/3         4/3         1/3         4/3         4/3         1/3         4/3         4/3         1/3         4/3         4/3         1/3         4/3         4/3         1/3         4/3         4/3         1/3         4/3         1/3         4/3         1/3         4/3         1/3         4/3         1/3         4/3         1/3         4/3         1/3         4/3         1/3         4/3         1/3         4/3         1/3         4/3         1/3         4/3         1/3         4/3         1/3         4/3         1/3         4/3         1/3         4/3         1/3         4/3         1/3         4/3         1/3         4/3         1/3         4/3         1/3         4/3         1/3         4/3         1/3         4/3         1/3         4/3         1/3         4/3         1/3         4/3         1/3<		Arterials	201	1017	70001	C	0.0%	305	305	100.0%	0	0.0%
Expressways $3^{-1}$ $10^{-1}$ $5^{-1}$ $4^{-1}$ $2^{-1}$ $10^{-1}$ $10^{-1}$ $10^{-1}$ $10^{-1}$ $10^{-1}$ $10^{-1}$ $10^{-1}$ $10^{-1}$ $10^{-1}$ $10^{-1}$ $10^{-1}$ $10^{-1}$ $10^{-1}$ $10^{-1}$ $10^{-1}$ $10^{-1}$ $99.8^{-1}$ $10^{-1}$ $10^{-1}$ $99.8^{-1}$ $10^{-1}$ $10^{-1}$ $10^{-1}$ $10^{-1}$ $10^{-1}$ $10^{-1}$ $10^{-1}$ $10^{-1}$ $10^{-1}$ $10^{-1}$ $10^{-1}$ $10^{-1}$ $10^{-1}$ $10^{-1}$ $10^{-1}$ $10^{-1}$ $10^{-1}$ $10^{-1}$ $10^{-1}$ $10^{-1}$ $10^{-1}$ $10^{-1}$ $10^{-1}$ $10^{-1}$ $10^{-1}$ $10^{-1}$ $10^{-1}$ $10^{-1}$ $10^{-1}$ $10^{-1}$ $10^{-1}$ $10^{-1}$ $10^{-1}$ $10^{-1}$ $10^{-1}$ $10^{-1}$ $10^{-1}$ $10^{-1}$ $10^{-1}$ $10^{-1}$ $10^{-1}$ $10^{-1}$ $10^{-1}$ $10^{-1}$ $10^{-1}$ $10^{-1}$ $10^{-1}$ $10^{-1}$ $10^{-1}$	Alameda	Freeways	50C		97.5%	. 14	1.3%	36	40	90.7%	4	-0.5%
$ \begin{array}{ c c c c c c c c c c c c c c c c c c c$		Expressways	700	9C8 1	45.7%	45	2.5%	803	1,829	43.9%	12	0.7%
		Arterials	000 F01	184	%8 66	0	0.0%	184	184	%8.66	0	0.0%
Expressways $31$ $1,590$ $39,5\%$ $28$ $-1,6\%$ $658$ $1,259$ $41,2\%$ $-1$ Arterials $173$ $174$ $99,5\%$ $1$ $0,2\%$ $52$ $64$ $82,0\%$ $0$ Freeways $46$ $64$ $72,4\%$ $-6$ $0,1\%$ $52$ $64$ $82,0\%$ $0$ Arterials $212$ $734$ $28,9\%$ $-38$ $-4,9\%$ $263$ $734$ $35,9\%$ $0$ Arterials $212$ $734$ $28,9\%$ $-38$ $-4,9\%$ $263$ $734$ $35,9\%$ $0$ Arterials $212$ $734$ $20,0\%$ $0$ $0,0\%$ $2132$ $00,0\%$ $0$ $00\%$ $0$ Arterials $110$ $484$ $22,7\%$ $20$ $00,0\%$ $0$ $00\%$ $0$ Arterials $110$ $484$ $22,7\%$ $22$ $47$ $11,3\%$ $10,0\%$ $0$ Arteria	Contra	Freeways		2	81.18	-	-0.7%	36	50	72.2%	4	10.4%
Arterials         op 1         1.72         174         99.0%         0           Freeways         173         174         99.5%         1         0.1%         52         64         82.0%         0           Expressways         46         64         72.4%         -6         0.1%         52         64         82.0%         13           Arrerials         212         734         28.9         -49%         263         734         35.9%         13           Arrerials         212         734         28.9         -49%         263         734         35.9%         13           Arrerials         210         0.0%         0         0.0%         37         37         00.0%         0           Arrerials         110         484         22.7%         -2         -0.1%         100.0%         0         0           Arrerials         110         484         22.7%         -2         -1132         100.0%         0         0         0         0         0         0         0         0         0         0         0         0         0         0         0         0         0         0         0         0	Costa	Expressways	10	200	39.5%	-28	-1.6%	658	1,598	41.2%	-	0.2%
Freeways $1/3$ $1/3$ $1/3$ $1/3$ $1/3$ $1/3$ $1/3$ $1/3$ $1/3$ $1/3$ $1/3$ $1/3$ $1/3$ $1/3$ $1/3$ $1/3$ $1/3$ $1/3$ $1/3$ $1/3$ $1/3$ $1/3$ $1/3$ $1/3$ $1/3$ $1/3$ $1/3$ $1/3$ $1/3$ $1/3$ $1/3$ $1/3$ $1/3$ $1/3$ $1/3$ $1/3$ $1/3$ $1/3$ $1/3$ $1/3$ $1/3$ $1/3$ $1/3$ $1/3$ $1/3$ $1/3$ $1/3$ $1/3$ $1/3$ $1/3$ $1/3$ $1/3$ $1/3$ $1/3$ $1/3$ $1/3$ $1/3$ $1/3$ $1/3$ $1/3$ $1/3$ $1/3$ $1/3$ $1/3$ $1/3$ $1/3$ $1/3$ $1/3$ $1/3$ $1/3$ $1/3$ $1/3$ $1/3$ $1/3$ $1/3$ $1/3$ $1/3$ $1/3$ $1/3$ $1/3$ $1/3$ $1/3$ $1/3$ $1/3$ $1/3$ $1/3$ $1/3$		Arterials		a/c*i	2000	-	0.5%	172	174	%0.66	0	0.0%
Expressways         73         28,9%         -38         -4,9%         263         734         35,9%         13           Arrenials         212         734         28,9%         -38         -4,9%         263         734         35,9%         13           Arrenials         212         734         100,0%         0         0,0%         37         37         100,0%         0           Freeways         37         10         0,0%         73         73         100,0%         0           Arrenials         110         484         22,7%         -2         0,1%         132         100,0%         0           Arrenials         110         484         22,7%         -2         0,1%         132         14         9           Arrenials         110         484         22,7%         -4         1         4         2         4         4           Arrenials         132         100,0%         0         0,0%         7         7         7         1         4         4         3         3         4         3           Arrenials         7,7%         1,3         7,7%         1,4         9,7%         7         1 <td>Solano</td> <td>Freeways</td> <td>2/1</td> <td>54</td> <td>77 4%</td> <td>. 4</td> <td>0.1%</td> <td>52</td> <td>64</td> <td>82.0%</td> <td>0</td> <td>8.7.6</td>	Solano	Freeways	2/1	54	77 4%	. 4	0.1%	52	64	82.0%	0	8.7.6
Arterials         Z12         Z14         Z01         Z14         Z12         Z14         Z12         Z14         Z12         Z13         Z100.0%         Z13         Z132         Z100.0%         Z132         Z132         Z100.0%         Z132         Z133         Z132         Z132         Z132         Z132         Z132         Z132 <thz12< th=""> <thz12< th=""> <thz12< th=""></thz12<></thz12<></thz12<>		Expressways	₽ <u>;</u>	467	78.9%	86-	4.9%	263	734	35.9%	13	2.1%
Freeways         Z4         <		Arterials	717	FC/ VC	100.0%	0	0.0%	24	24	100.0%	0	0.0%
Expressways         37         97         90         90         70         84         22.7%         -2         -0.1%         108         484         22.7%         -4           Arrerials         I10         484         22.7%         -2         -0.1%         132         100.0%         0           Arrerials         I10         484         22.7%         -2         0.1%         132         100.0%         0           Expressways         20         20         20         0         0.0%         20         20         132         100.0%         0           Arrerials         20         77         100.0%         0         0.0%         77         11.160         41.1%         43           Arrerials         777         100.0%         0         0.0%         77         77         100.0%         0           Arrerials         167         559         29.8%         43         7.7%         124         99.6%         -2           Arrerials         1,444         99.7%         -16.6%         443         99.6%         -2         2         22.2%         0           Feeways         1,41         777         124         99.6%	Napa	Freeways	47 7	17 17	100.0%	C	0.0%	37	37	100.0%	0	0.0%
Arterials         10 $-0.0$ $-0.0$ $-0.0$ $-0.0$ $-0.0$ $-0.0$ $-0.0$ $-0.0$ $-0.0$ $-0.0$ $-0.0$ $-0.0$ $-0.0$ $-0.0$ $-0.0$ $-0.0$ $-0.0$ $-0.0$ $-0.0$ $-0.0$ $-0.0$ $-0.0$ $-0.0$ $-0.0$ $-0.0$ $-0.0$ $-0.0$ $-0.0$ $-0.0$ $-0.0$ $-0.0$ $-0.0$ $-0.0$ $-0.0$ $-0.0$ $-0.0$ $-0.0$ $-0.0$ $-0.0$ $-0.0$ $-0.0$ $-0.0$ $-0.0$ $-0.0$ $-0.0$ $-0.0$ $-0.0$ $-0.0$ $-0.0$ $-0.0$ $-0.0$ $-0.0$ $-0.0$ $-0.0$ $-0.0$ $-0.0$ $-0.0$ $-0.0$ $-0.0$ $-0.0$ $-0.0$ $-0.0$ $-0.0$ $-0.0$ $-0.0$ $-0.0$ $-0.0$ $-0.0$ $-0.0$ $-0.0$ $-0.0$ $-0.0$ $-0.0$ $-0.0$ $-0.0$ $-0.0$ $-0.0$ $-0.0$ $-0.0$ $-0.0$ $-0.0$ $-0.0$ $-0.0$ <		Expressways	10	/C	20.001 27 7%	. 4	-0.1%	108	484	22.2%	4	-0.5%
Ia         Freeways         1.2         1.2         1.2         1.2         1.2         1.2         1.2         1.2         1.2         1.2         1.2         1.2         1.2         1.2         1.2         1.2         1.2         1.2         1.2         1.2         1.2         1.2         1.2         1.2         1.2         1.2         1.2         1.2         1.2         1.2         1.2         1.1         4         43         43         43         43         43         43         43         43         43         43         43         43         43         44         43         43         43         43         43         43         43         43         43         43         43         43         43         43         43         43         43         43         43         43         43         43         43         43         43         43         43         43         43         43         43         43         43         43         43         43         43         43         43         43         43         43         43         43         43         43         43         43         43         44         44 <td></td> <td>Arterials</td> <td></td> <td>5</td> <td>2000</td> <td>0</td> <td>0.0%</td> <td>132</td> <td>132</td> <td>100.0%</td> <td>0</td> <td>0.0%</td>		Arterials		5	2000	0	0.0%	132	132	100.0%	0	0.0%
Expressways         20         27%         27%         477         1,160         41,1%         43           Arterials         77         77         100,0%         0         0,0%         77         77         100,0%         0           Freeways         167         559         29,8%         43         7,7%         124         559         22,2%         0           Arterials         167         559         29,8%         43         7,7%         124         559         22,2%         0           Arterials         1,439         1,444         99,7%         0         0,1%         1,444         99,6%         -2         -2           Freeways         1,413         1,444         99,7%         0         0,1%         1,444         99,6%         -2         -2           Faterials         1,439         1,444         99,6%         -21         -1,6%         438         -9         -2           Faterials         3,933         10,144         38,8%         -21         -1,6%         7,7%         10,14         38,5%         -9           Arterials         3,933         10,144         38,6%         -9         11,1%         3,901         10,14	Sonoma	Freeways	72	70	100.0%	0	0.0%	20	20	100.0%	0	0.0%
Arterials         Hou         Live         Data         Data <thdata< th=""> <thdata< <="" td=""><td></td><td>Expressways</td><td>07</td><td>07 -</td><td>%L 91</td><td>27</td><td>2.5%</td><td>477</td><td>1,160</td><td>41.1%</td><td>43</td><td>4.0%</td></thdata<></thdata<>		Expressways	07	07 -	%L 91	27	2.5%	477	1,160	41.1%	43	4.0%
Freeways         //         //         //         //         //         //         //         0           read         Arterials         167         559         29.8%         43         7,7%         124         559         22.2%         0           read         Freeways         1,439         1,444         99.7%         0         0.1%         1,438         1,444         99.6%         -2           read         Freeways         417         479         86.9%         -21         -1.6%         428         479         89.2%         -9           Arterials         3,933         10,144         38.8%         99         1,1%         3,901         10,144         38.5%         67           Arterials         3,933         10,144         38.8%         78         0,9%         5,767         12,067         47.3%         56		Arterials	400	44	20001	0	0.0%	Ħ	11	100.0%	0	0.0%
Arterials         Tot (438)         1,438         1,444         99.7%         0         0.1%         1,438         1,444         99.6%         -2           Freeways         1,439         1,444         99.7%         0         0.1%         1,438         1,444         99.6%         -2           Freeways         417         479         86.9%         -21         -1.6%         428         479         89.2%         -9           Arterials         3,933         10,144         38.8%         99         1.1%         3,901         10,144         38.5%         67           Arterials         5,767         12,067         48.0%         78         0.9%         5,767         12,067         478         56	Marin	Freeways		1	29.90	. 4	7.7%	124	559	22.2%	0	0.1%
Freeways         1,737         1,717         770         201         -1.6%         428         479         89.2%         -9           Expressways         417         479         86.9%         -21         -1.6%         428         479         89.2%         -9           Arterials         3,933         10,144         38.8%         99         1.1%         3,901         10,144         38.5%         67           Arterials         5,767         12,067         48.0%         78         0.9%         5.767         12,067         47.8%         56		Arterials		1 444	%2.66	0	0.1%	1,438	1,444	%9.66	4	0.1%
ys         10,144         38.8%         99         1,1%         3,901         10,144         38.5%         67           5,789         12,067         48.0%         78         0,9%         5,767         12,067         47.8%         56	Bay Area	Freeways	714	479	86.9%	-21	-1.6%	428	479	89.2%	6-	0.7%
5.767 12.067 48.0% 78 0.5% 5.767 12.067 47.8% 56		Expressways	514 5	10.144	38.8%	8	1.1%	3,901	10,144	38.5%	67	0.8%
		Arterials	C 700	12 0.67	48.0%	82	%6.0	5,767	12,067	47.8%	35	0.7%

Roadway Directional Miles > 66 dBA NAC Level, and Total Directional Miles, by Roadway Type and County t'd'): 141 2 1-Ě

3.1-33

Source: Environmental Science Associates 2008; Metropolitan Transportation Commission Model Outputs 2008

Toblo 2	1.15 Roadu	Tchlo 2 1-16 Roadway Directional Miles with Significant Increase In Noise Levels (	tional <b>N</b>	<b>diles</b> with	Significar	It increa	The III INC	IDADI DOIO	۱J							
								Year	Year 2035, Heavy	AVD	Year	Year 2035, Heavy	hе	Year	Year 2035, Heavy	eavy
		Year	Year 2035 Proiect	niect	Year 2	Year 2035, No Project	oject	Mai	Maintenance/CP	م	Maintena	Maintenance/CP + Land Use	and Use	Mainten	Maintenance/CP + Pricing	- Pricing
				o/			% with			% with			% with >	۳ ۸		% with
					Var c -		>2 ABA	> 3 dBA		> 3 dBA	> 3 dBA		3 dBA	dBA		>3 dBA
	Roadway	> 3 dBA	Tatal	AdD 2<	hurance	Total	increase	Increase	Total	increase	Increase	Total	increase	Increase	Total	increase
County	lype	Increase	1 0201	וווכובתאב	11101 20130	1000	1000		3	7000	4	5	7.00%	2	53	2.90%
	Freeways	5	55	8.30%	<b>m</b>	γ.	6.00%		3 (	%00 oc		; `	200.0	0	2	0.00%
San .	Expressways	0	7	0.00%	0.4	2	28.30%	0.4	7	70.00		۲ در ر	2000		229	20% R
Francisco	Arterials	70	631	11.10%	8	633	12.90%	8	633	12.90%	101	550	0.00%		071	20000
	Freewave	03	168	0.20%	0.4	168	0.20%	0.4	168	0.20%	0	168	200.0		8	~~~~~
San	Everations	n –	3	4.60%	4	31	11.80%	4	31	11.80%	2	31	5.40%	- !	15	1.60%
Mateo	Amonials		1 063	16.70%	225	1,063	21.20%	225	1,063	21.20%	218	1,063	20.50%	6/1	1,063	16.80%
	Arterials		700	0 70%	2	326	0.70%	2	326	0.70%	2	326	0.70%	2	326	0.70%
Santa	Freeways	7 00	07C	202.0	- Yr	234	15.60%	36	234	15.60%	38	234	16.30%	28	234	11.90%
Clara	Expressways	2	404 7 010	%0/.2F	467	2 058	77.50%	462	2,058	22.50%	376	2,058	18.30%	370	2,058	18.00%
	Arterials	345	20012	0.10%	70	305	70%	6	305	0.70%	2	305	0.70%	2	305	0.70%
	Freeways	2	εŬ ε	0./U%	1 9		20100	· <u> </u>	39	24.90%	=	39	29.00%	7	39	17.40%
Alameda	Expressways	m	39	/.40%			20110	380	1.801	21.10%	425	1,801	23.60%	300	1,801	16.70%
	Arterials	270	1,801	~00.cl	000	100	1 70%		187	1 70%	4	182	2.30%	m	182	1.90%
	Freeways	00	182	4.40%	<b>n</b> 1	70	%0/-I	יי ר 	70.	17 10%	0.2	27	0.80%	m	27	12.10%
	Expressways	20	27	17.10%	0 i	127	201./I		1576	20 70%	254	1.526	16.60%	262	1,526	17.20%
	Arterials	272	1,525	11.80%	515	070'1	V0/07		174	7001	-	174	0.70%	2	174	1.00%
	Freeways	m	174	1.60%	7	+/I	%00-1	4 <u>c</u>	5	202.1	. v	63	10.50%	01	62	16.70%
Solano	Expressways	4	62	6.60%	0	79	%0/.91 	2	70	200.01	o 62	20	10.80%	=	732	15.10%
	Arterials	80	732	11.00%	11	/32	10.30%		70	20000		2	2000	c	24	0.00%
	Freeways	0	24	0.00%	0	24	0.00%	0	74	200.0	C	57	%0000		17	0.00%
Napa	Expressways	0	31	0.00%	0	ы П	0.00%	0	15	%00.0 27 00%	° 6	10	20110	201	484	21.30%
	Arterials	69	484	14.20%	35	484	2/14.12	C51	101	w01.17	70	2	0.40%	20	133	0 40%
	Freeways	0.5	132	0.40%	0.5	132	0.40%	c.0	761	%0+.0 %0000			0.00%		20	0.00%
Sonoma	Expressways	0	50	0.00%	•	20	0.00%	0	8	%00°0		3 1	20000	200		17.80%
	Arterials	151	1,153	13.10%	219	1,153	19.00%	213	561,1	%00.4I			8/01.2	2		0.40%
	Freeways	-	77	0.90%		11	0.40%	0.3	1	0.40%	F. 0	//	30 00 0C	C.0	1/	15,00%
Marin	Arterials	30	559	5.40%	011	559	19.60%	0	559	19.60%	7/1	700	20.00%	10		20000
	Eroownyc	10	1.441	1.50%	4	1,439	0.90%	4	1,439	0.90%	4	1,439	200.1	2 9	7.4.7 7.4.7	0.8U%
Rav Area	Funderman	i =	447	25.40%	65	447	14.60%	65	447	14.60%	62	447	3.80%	44	44/	N02.01
	Artarials	1 463	10.007	14.60%	2,047	10,008	20.50%	2,047	10,008	20.50%	1,872	10,008	18.70%	1,666	10,008	10.00%
	Ai tel Idis	1 597	11 895	13 40%	2.126	11.894	17.90%	2,126	11,894	17.90%	1,948	11,894	16.40%	1,726	11,894	14.50%
	Combined	1201	2,0,1													

Directional Miles with Significant Increase in Noise Levels (> 3 dBA), Alternatives Comparison ÷ Table 2 1.15 R

Combined 1 1,57/ 11,875 13.40% 4.1.20 11.274 17.70% 1 2.1.20 11. Source: Environmental Science Associates, 2008; Metropolitan Transportation Commission Model Outputs 2008

3.1-34

Chapter 3.1: Alternatives to the Project

#### **GEOLOGY AND SEISMICITY**

The proposed Project would likely result in the greatest number of specific transportation improvements being constructed in areas susceptible to geologic and seismic hazards, due simply to the fact that more new construction would occur under the proposed Project than under the other alternatives. However, the proposed Project would not result in any significant geologic or seismic risk that could not be mitigated to a less-than-significant level. Moreover, the new construction or re-construction or rehabilitation of transportation facilities would tend to reduce the overall seismic risk to users of those facilities. The proposed Project would include numerous projects that involve seismic retrofits or replacement of older, more earthquake-hazard prone facilities. For example, the reconstruction of a freeway overpass in an area prone to liquefaction would be considered a seismically beneficial impact as the more earthquake-hazard-prone overpass would be replaced. To the extent that the three Heavy Maintenance/Climate Protection Emphasis alternatives or the No Project Alternative would include fewer transportation improvements involving seismic upgrades than the proposed Project, these alternatives could result in incrementally greater impacts.

#### WATER RESOURCES

The proposed Project would likely result in the greatest potential direct, construction-related impacts on water resources, due to the fact that more new construction would occur at more specific locations under the proposed Project than under the other alternatives. The proposed Project would also have the greatest indirect and cumulative effects related to the intensification of regional urban uses associated with the expansion of roadways and other proposed transportation improvements, creating more impervious surfaces and increasing nonpoint-source pollutants, potentially affecting water quality, altering drainage patterns, and creating higher erosion rates and reduce groundwater recharge. However, all such impacts of the proposed Project could be mitigated to a less-than-significant level by mitigation measures identified in Chapter 2. Water resources impacts of each of the alternatives would be virtually the same, but because they involve fewer construction projects, their water resource impacts would incrementally be less substantial than those of the proposed Project. Like the proposed Project, these impacts could be mitigated to a less-than-significant level.

#### **BIOLOGICAL RESOURCES**

The proposed Project would likely result in the greatest potential direct, construction-related impacts on wetlands, special status species, and designated or proposed critical habitat, due to the fact that more new construction would occur at more locations under the proposed Project than under the other alternatives. However, at the programmatic level, it is not possible to identify the precise impacts of specific transportation improvement projects on the above-noted resources or on long-term fragmentation of undeveloped lands that serve as plant and animal habitat. It can be anticipated that the Heavy Maintenance/Climate Protection Emphasis + Land Use alternative would act somewhat more strongly than the proposed Project or the other alternatives to direct development towards already urbanized areas and to increase density, rather than contributing to sprawl and lower-density development that requires the conversion of biologically sensitive resource lands. Likewise, to the extent that the Heavy Maintenance/Climate Protection Emphasis + Pricing alternative motivates travelers to locate in urban centers, that alternative could also result in less open space land conversion. In this respect, the two Heavy Maintenance/Climate Protection Emphasis alternative variations would be likely to have incrementally lesser long-term impacts on biological resources in the region. As with the proposed Project, it is anticipated that

effects of each of the alternatives on biological resources, although potentially significant, could be mitigated to a less-than-significant level with measures identified in Chapter 2, with the exception of effects on special-status species from construction related to specific transportation improvements. This impact is considered potentially significant and unavoidable for all alternatives due to the practical difficulty of ensuring adequate mitigation for effects on species at a programmatic level of analysis.

#### VISUAL RESOURCES

The Transportation 2035 Plan contains new commitments with potentially significant visual impacts in scenic corridors and thus would have the greatest visual impact compared to all the other alternatives.

The Heavy Maintenance/Climate Protection Emphasis alternative focuses almost entirely on system maintenance which would not significantly change the physical configuration of existing transportation facilities and is unlikely to have effects on views. The Heavy Maintenance/Climate Protect Emphasis + Pricing alternative would have visual impacts similar to Heavy Maintenance Alternative because pricing strategies would not involve projects that would create visual contrasts or new visual elements. The Heavy Maintenance/Climate Protection Emphasis + Land Use alternative would have similar direct visual impacts as the Heavy Maintenance Alternative as well because it would not involve the construction of additional new transportation infrastructure. However, cumulatively, the Heavy Maintenance/Climate Protection Emphasis + Land Use alternative may result in more visual impacts related to infill development and intensification of existing urban areas, compared to the proposed Project and each of the other alternatives.

The No Project alternative does not contain any new commitments, and thus has the fewest investment projects with potentially significant visual impacts.

In summary, all three Heavy Maintenance/Climate Protection Emphasis alternatives and the No Project alternative are environmentally superior to the proposed Project and negligibly different from one another in terms of visual resource impacts.

#### **CULTURAL RESOURCES**

Because it contains the most new construction, the proposed Project will have the most potential to disturb, disrupt, or significantly affect cultural resources, including historical, archaeological, and paleontological resources and human remains.

- The No Project alternative consists of investment projects that have full funding commitments and does not include new construction projects, so it has less potential to affect cultural resources.
- The Heavy Maintenance/Climate Protection Emphasis alternative includes the projects that are fully committed and some new construction projects that focus almost entirely on system maintenance. Because system maintenance projects are unlikely to include ground-disturbing activities or activities which will create significant visual changes adjacent to historic structures or landmarks, the Heavy Maintenance/Climate Protect Emphasis alternative will have less potential to affect cultural resources than the proposed Project. The potential

Chapter 3.1: Alternatives to the Project

impacts of the No Project and Heavy Maintenance alternatives are approximately the same since the ground-disturbing activity in each alternative is approximately the same.

- The Heavy Maintenance/Climate Protection Emphasis + Pricing alternative focuses on system maintenance and pricing strategies. Pricing strategies do not result in any construction or ground-disturbing activities so the potential for cultural impacts is the same as the Heavy Maintenance/Climate Protect Emphasis alternative.
- The Heavy Maintenance/Climate Protection Emphasis + Land Use alternative could have slightly less potential archaeological and paleontological impacts than the Heavy Maintenance/Climate Protection Emphasis alternative because it presumes more development in areas that are urbanized, already disturbed, and likely to have been subject to previous cultural surveys. However, projects within urbanized areas that entail ground-disturbing activity still have some potential to disturb or destroy resources. Projects within urbanized areas could have slightly greater historical resource impact because infill development has a greater potential to affect identified historic structures. However, there is also a chance of encountering unidentified historic resources in non-urbanized areas. Thus, the overall potential cultural resources impact is similar to that in the Heavy Maintenance/Climate Protection Emphasis alternative.

In summary, due to the difference in potential new construction, all alternatives are somewhat preferable to the proposed Project and negligibly different from one another in terms of cultural resource impacts.

#### **GROWTH-INDUCING EFFECTS**

As described in Chapter 2.12, the proposed Project is not expected to induce growth in the region beyond that projected in ABAG's *Projections 2007*. The primary reasons for this *de minimis* conclusion are (abbreviated from Chapter 2.12):

- Historically, transportation investment in general, and increased transportation capacity in particular, lag behind the growth that occurs in the Bay Area;
- Due to the maturity of development in the region and the existing transportation system and mode choices already available, incremental corridor improvements are expected to play a minimal role in attracting or inducing new development to the region as a whole;
- Most of the local agencies in the Bay Area with land use jurisdiction over territory that lies along the urban/rural boundaries have adopted a wide variety of growth management regulations to manage urban sprawl;
- Population growth is limited by the historic inability of the Bay Area to provide affordable housing to meet demand; and
- There have been recent changes in local land use and investment decision-making geared toward fewer car trips, smaller cars, transit accessibility, infill development, and overall reduced environmental impacts of Bay Area lifestyles.

Growth-inducing effects may occur at the local level (movement within the region rather than into the region; and the allocation of anticipated future residents to specific places over others), but these effects would be consistent with *Projections 2007*, which anticipates more infill and densification in urban centers.

Likewise, the alternatives to the proposed Project would not have regional growth-inducing effects for the same reasons as those given for the proposed Project. Similar to the proposed Project, the alternatives may result in local growth-inducing effects, particularly in the case of the Heavy Maintenance/Climate Protection Emphasis + Land Use alternative, where additional policy pressures would be implemented at the regional level to concentrate growth even more strictly toward transit and urban centers. As the networks for the Heavy Maintenance/Climate Protection Emphasis alternative are essentially the same, the localized growth inducing effects are essentially the same as well, and would be consistent with *Projections 2007*.

#### ENVIRONMENTALLY SUPERIOR ALTERNATIVE

CEQA Guidelines require each EIR to identify the environmentally superior alternative among the alternatives analyzed. If the No Project alternative is identified as the environmentally superior alternative, then the EIR must identify another alternative from among the alternatives analyzed.

There are numerous tradeoffs in impacts associated with the various alternatives. The alternatives also would result in varying degrees of success at achieving the Transportation 2035 Plan goals and objectives.

As a reminder, the adopted goals of the proposed Project are maintenance and safety, reliability, efficient freight travel, security and emergency management, clean air, climate protection, equitable access, and livable communities. The performance objectives designed to measure the region's progress towards meeting these goals include: reducing vehicle miles traveled, congestion and carbon dioxide and particulate matter emissions, and collisions/fatalities; decreasing transportation and housing costs for low-income families; and improving system maintenance. Therefore, an alternative that performs substantially worse than the proposed Project with respect to meeting the plan goals would not achieve even the basic objectives of the proposed Project.

#### **ENVIRONMENT**

According to the analysis, the Heavy Maintenance/Climate Protection Emphasis + Pricing alternative and the Heavy Maintenance/Climate Protection + Land Use alternative perform better than the proposed Project overall, while the No Project and the Heavy Maintenance/Climate Protection Emphasis alternative perform comparably or slightly worse than the proposed Project. More specifically:

- In **Transportation**, the Heavy Maintenance/Climate Protection Emphasis + Land Use alternative is the environmentally superior alternative. Considering multiple factors, it performs better than the proposed Project and the other alternatives primarily due to the projected increased proximity of population and jobs to transit and to one another;
- In Energy and Climate Change, the Heavy Maintenance/Climate Protection Emphasis + Pricing alternative is the environmentally superior alternative. It performs somewhat better than the proposed Project and the other alternatives, due mostly to decreased congestion which allows fewer emissions per mile traveled;

#### Chapter 3.1: Alternatives to the Project

- In Air Quality, Water Resources, Biological Resources, Visual Resources, and Cultural Resources, the Heavy Maintenance/Climate Protection Emphasis + Pricing alternative and Heavy Maintenance/Climate Protection + Land Use alternative perform equally well, and better than the proposed Project, due to less new construction and therefore less natural land conversion to transportation use, fewer emissions, and fewer opportunities for disrupting visual or cultural resources;
- In **Noise** and **Geology**, the proposed Project is the environmentally superior alternative. This is because the physical improvements contained within the proposed Project create the least new exposure to noise (least new exposure to 66 dBA, as well as least exposure to change of 3 dBA or more), and new projects built or renovated to current engineering codes are likely to be less vulnerable to seismic activity than older projects; and
- In only one issue area—Land Use—is the No Project the environmentally superior alternative. This is because the three Heavy Maintenance/Climate Protection Emphasis alternatives include additional transportation investments, which could result in marginally more land use impact (particularly urban land use disruption or displacement) than the set of transportation investments within the No Project alternative.

However, from the cumulative perspective, the Heavy Maintenance/Climate Protection Emphasis + Land Use alternative may in fact be environmentally superior because it has the potential to decrease wider regional open space conversion to urban use by directing population growth and development to existing urban centers.

Though both the Heavy Maintenance/Climate Protection Emphasis alternative + Land Use alternative and Heavy Maintenance/Climate Protection + Pricing alternative perform very well, this CEQA analysis concludes that the Heavy Maintenance/Climate Protection Emphasis + Pricing alternative is the environmentally superior alternative, primarily because:

- It demonstrated superior performance in Energy and Climate Change issue areas which are of critical concern to the Bay Area today;
- It has more potential flexibility of applying and adjusting pricing controls to current needs;
- It can in theory be applied "immediately" and begin realizing environmental benefits sooner than land use change; and
- It has a stronger potential market influence on new "green" technologies than land use changes.

In the interest of transparency and disclosure, the project objectives and feasibility discussion below carry through both the Heavy Maintenance/Climate Protection + Pricing alternative and the Heavy Maintenance/Climate Protection + Land Use alternative.

#### **PROJECT OBJECTIVES**

In terms of objectives, the Heavy Maintenance/Climate Protection Emphasis alternative with the pricing and land use variations are both likely to meet most of the basic project objectives of the proposed Project:

• Maintenance & Safety (both of these alternatives provide more spending on maintenance, operations, and shortfalls than the proposed Project);

- **Reliability** and **Equitable Access** (the Land Use alternative performed best and the Pricing alternative performed second-best in the Transportation issue area);
- Livable Communities (both of these alternatives provide more funding than the proposed Project for the Transportation for Livable Communities Program, the Regional Bicycle Network, Transportation Climate Action Campaign, and the Lifeline Transportation Program);
- Clean Air (both Land Use and Pricing alternative variations perform better than the proposed Project in the Air Quality analysis); and
- **Climate Protection** (Pricing performed best and Land Use performed second-best in the Greenhouse Gas Emissions comparison).

It is less clear how the Heavy Maintenance/Climate Protection Emphasis + Pricing alternative and Heavy Maintenance/Climate Protection + Land Use alternative would perform in regards to the two remaining performance objectives, Efficient Freight Travel and Security & Emergency Management, particularly without the full program of improvements in the proposed Project. Nonetheless, given that both the Pricing and the Land Use alternatives perform better than the proposed Project in the transportation analysis, it would seem that they could also result in more efficient freight travel and perhaps better transportation security and emergency management.

#### FEASIBILITY

Despite this favorable evaluation for the Heavy Maintenance/Climate Protection Emphasis + Pricing and Heavy Maintenance/Climate Protection + Land Use, there are some important unanswered questions about the feasibility of each of these alternatives:

- The performance of the Heavy Maintenance/Climate Protection Emphasis + Land Use alternative is predicated on hypothetical land use assumptions that cannot be realized without substantial governmental intervention, through regulation or new incentives to create public funding for housing and infrastructure improvements and increased levels of public services and facilities which would be needed by the proposed intensification of residential development in the urban core. The regional agencies (MTC, ABAG, BCDC, and BAAQMD) do not currently have the power to enforce the assumed land use outcomes; local governments currently have authority over local land use decisions. Unresolved conflicts with local General Plans, "community character" concerns, and local economic development objectives also would affect realization of these land use assumptions.
- The performance of the Heavy Maintenance/Climate Protection Emphasis + Pricing alternative also presumes that regional agencies have certain authority to impose new pricing strategies, most of which are subject to legislative or voter approval. For those strategies that require legislative or voter approval, any economic downturn reduces public support for "taxing" schemes that intentionally raise the price of driving, particularly in the short term before households can locate closer to urban centers and transit. Though the Regional HOT Network will require new legislative authority to implement in the Bay Area, the magnitude of the legislative changes required for the aggressive pricing strategies proposed under this alternative are greater and possibly more contentious than changes required for the HOT Network.

Chapter 3.1: Alternatives to the Project

While there were compelling reasons to evaluate both of these alternatives in full through this EIR, the feasibility issues here indicate that MTC and its partners lack the authority to implement them. Rather, the onus rests on outside agencies (local governments, primarily, but also State agencies such as Caltrans) over which MTC has no direct control. Ultimately, policy makers must decide if the underlying assumptions made for the Heavy Maintenance/Climate Protection Emphasis + Pricing Emphasis alternative and the Heavy Maintenance/Climate Protection Emphasis + Land Use alternative are reasonable, feasible, and consistent with and supportive of the Transportation 2035 Plan's goals and objectives. Also, policy makers will be required to judge the relative importance of the various issue areas in making their final decision. The Commission will address these questions during its deliberations on this EIR.

Proposed Project	No Project	Heavy Maintenance/ Climate Protection	Heavy Maintenance/ Climate Protection + Pricing	Heavy Maintenance/ Climate Protection + Land Use
Transportation				
High level of accessibility to jobs by autos and transit compared to existing conditions	Slightly lower accessibility to jobs by autos, and considerably lower accessibility to jobs by transit compared to proposed Project	Slightly lower accessibility to jobs by autos, and considerably lower accessibility to jobs by transit compared to proposed Project	Slightly higher level of accessibility to jobs by autos; considerably lower accessibility to jobs by transit compared to proposed Project	Considerably higher accessibility to jobs by autos; significantly higher access to jobs by transit compared to proposed Project
Increased VMT at LOS F for all facility types compared to existing conditions	Greater VMT at LOS F compared to proposed Project	Greater VMT at LOS F compared to proposed Project	Greater VMT at LOS F for freeways compared to proposed project but slightly fewer VMT at LOS F for expressways and arterials compared to proposed Project	Greater VMT at LOS F for freeways compared to proposed project but considerably fewer VMT at LOS F for expressways and arterials compared to proposed Project
Slight increase in per capita VMT compared to existing conditions	Slight increase in per capita VMT compared to proposed Project	Slight increase in per capita VMT compared to proposed Project	Slight decrease in per capita VMT compared to proposed Project	Slight decrease in per capita VMT compared to proposed Project
Air Quality				
Short-term construction-related emission impacts due to construction of projects in proposed Project	Slightly lower short- term construction- related emission impacts due to construction of fewer projects	Slightly lower short- term construction- related emission impacts due to construction of fewer projects	Slightly lower short- term construction- related emission impacts due to construction of fewer projects	Slightly lower short- term construction- related emission impacts due to construction of fewer projects

#### Table 3.1-16: Summary of Alternatives Comparison to the Proposed Project

...

,

. . .

....

,

Proposed Project	No Project	Heavy Maintenance/ Climate Protection	Heavy Maintenance/ Climate Protection + Pricing	Heavy Maintenance/ Climate Protection + Land Use
Decreased ground-level ozone emissions (ROG, NOx) and carbon monoxide emissions from motor vehicle sources compared to existing conditions; higher PM <sub>10</sub> and PM <sub>25</sub> compared to existing conditions	Slightly higher ground-level ozone and particulate matter emissions from motor vehicle sources than proposed Project	Slightly ground-level ozone and particulate matter emissions from motor vehicle sources than proposed Project	Slightly lower I ground-level ozone and particulate matter emissions from motor vehicle sources than proposed Project	Slightly lower ground- level ozone and particulate matter emissions from motor vehicle sources than proposed Project
Lower level of TAC emissions from motor vehicle sources compared to existing conditions	Slightly higher level of TAC emissions from motor vehicle sources than proposed Project but this difference is not significant	Slightly higher level of TAC emissions from motor vehicle sources than proposed Project but this difference is not significant	Slightly lower level of TAC emissions from motor vehicle sources than proposed Project but this difference is not significant	Slightly lower level of TAC emissions from motor vehicle sources than proposed Project but this difference is not significant
Land Use				
Approximately 1,400 acres of farmland could potentially be affected by 142 projects in 8 counties	Less farmland impacted: About 260 acres in 7 counties	Less farmland impacted: About 300 acres in 8 counties	Less farmland impacted: About 300 acres in 8 counties	Substantially less farmland impacted: About 300 acres in 8 counties, plus conservation related to directing development to urban centers
Approximately 2,150 acres of existing land use could potentially be disrupted by 149 projects in 9 counties	Significantly fewer land uses disrupted: About 200 acres in 7 counties	Fewer land uses disrupted: About 300 acres in 8 counties	Fewer land uses disrupted: About 300 acres in 8 counties	Fewer land uses disrupted: About 300 acres in 8 counties, but perhaps more community disruption related to infill development and densification
Potential for short term community disruption due to construction activity	Substantially less potential for short term disruption due to fewer construction projects	Substantially less potential for short term disruption due to fewer construction projects	Substantially less potential for short term disruption due to fewer construction projects	Substantially less potential for short term disruption due to fewer construction projects

### Part Three: Alternative and CEQA-Required Conclusions Chapter 3.1: Alternatives to the Project

Proposed Project	No Project	Heavy Maintenance/ Climate Protection	Heavy Maintenance/ Climate Protection + Pricing	Heavy Maintenance/ Climate Protection + Land Use
Energy				
Decreased transportation energy consumption compared to existing conditions	Increased transportation energy consumption compared to the proposed Project	Increased transportation energy consumption compared to the proposed Project	Decreased transportation energy consumption compared to the proposed Project	Decreased transportation energy consumption compared to the proposed Project
Climate Change and Gro	eenhouse Gases			
Decreased CO <sub>2</sub> and CO <sub>2</sub> e emissions compared to existing conditions	Increased CO <sub>2</sub> and CO <sub>2</sub> e emissions compared to the proposed Project	Increased CO <sub>2</sub> and CO <sub>2</sub> e emissions compared to the proposed Project	Decreased CO <sub>2</sub> and CO <sub>2</sub> e emissions compared to the proposed Project	Decreased CO <sub>2</sub> and CO <sub>2</sub> e emissions compared to the proposed Project
Increased vulnerability to sea level rise compared to existing conditions	More vulnerability to sea level rise compared to the proposed Project	Slightly more vulnerability to sea level rise compared to the proposed Project	Comparable or slightly less vulnerability to sea level rise compared to proposed Project	Comparable or slightly more vulnerability to sea level rise compared to the proposed Project
Noise				
Significant temporary construction-related noise impacts on surrounding areas.	Temp. construction- related noise impacts. Far fewer projects=lower overall construction- related noise	Temp. construction- related noise impacts. Fewer projects=lower overall construction- related noise	Temp. construction- related noise impacts. Fewer projects=lower overall construction- related noise	Temp. construction- related noise impacts. Fewer projects=lower overall construction- related noise
Overall increase in roadway miles exposed to noise levels at or above 66 dBA, compared to existing conditions	Slightly more roadway miles exposed to noise levels at or above 66 dBA compared to the proposed Project	Slightly more roadway miles exposed to noise levels at or above 66 dBA compared to the proposed Project	Slightly more roadway miles exposed to noise levels at or above 66 dBA compared to the proposed Project	Slightly more roadway miles exposed to noise levels at or above 66 dBA compared to the proposed Project
Overall growth in areas subject to 3 dBA or more increase in noise levels compared to existing conditions	Slightly more areas experience a 3 dBA or more increase in noise levels compared to the proposed Project	Slightly more areas experience a 3 dBA or more increase in noise levels compared to the proposed Project	Slightly more areas experience a 3 dBA or more increase in noise levels compared to the proposed Project	Slightly more areas experience a 3 dBA or more increase in noise levels compared to the proposed Project
Geology and Seismicity	1			
Overall increase in seismic safety due to retrofits and engineering standards for new projects, compared to existing conditions	Less of an increase in seismic safety, compared to the proposed Project	Less of an increase in seismic safety, compared to the proposed Project	Less of an increase in seismic safety, compared to the proposed Project	Less of an increase in seismic safety, compared to the proposed Project

Proposed Project	No Project	Heavy Maintenance/ Climate Protection	Heavy Maintenance/ Climate Protection + Pricing	Heavy Maintenance/ Climate Protection + Land Use
Potential for increased soil erosion associated with construction	Somewhat less potential for increased construction-related soil erosion	Somewhat less potential for increased construction-related soil erosion	Somewhat less potential for increased construction-related soil erosion	Somewhat less potential for increased construction-related soil erosion
Some increase in potential long-term maintenance or repair of soil expansion or settlement impacts	Less of an increase in soil expansion or settlement impacts	Negligible decrease in soil expansion or settlement impacts	Negligible decrease in soil expansion or settlement impacts	Negligible decrease in soil expansion or settlement impacts
Water Resources				
Increased potential adverse impacts on water quality associated with construction compared to existing conditions	Fewer potential adverse construction related impacts compared to the proposed Project			
Increased adverse impacts on water quality, flooding, or groundwater resources due to increased impervious surface area, compared to existing conditions	Smaller increases in impervious surface area compared to the proposed Project	Smaller increases in impervious surface area compared to the proposed Project	Smaller increases in impervious surface area compared to the proposed Project	Smaller increases in impervious surface area compared to th proposed Project
Biological Resources				
May adversely affect wetlands and aquatic resources, compared to existing conditions	Less adverse affect on wetlands and aquatic resources, compared to the proposed Project	Less adverse affect on wetlands and aquatic resources, compared to the proposed Project	Less adverse affect on wetlands and aquatic resources, compared to the proposed Project	Less adverse affect of wetlands and aquati resources, compare to the proposed Project
May cause substantial disturbance of biologically unique or sensitive communities, compared to existing conditions	Less disturbance compared to the proposed Project	Less disturbance compared to the proposed Project	Less disturbance compared to the proposed Project	Substantially less disturbance compar to the proposed Project
May adversely affect special-status plant and/or wildlife species compared to existing conditions	Less adverse affect on special-status species compared to the proposed Project	Less adverse affect on special-status species compared to the proposed Project	Less adverse affect on special-status species compared to the proposed Project	Substantially less adverse affect on special-status speci compared to the proposed Project

### Part Three: Alternative and CEQA-Required Conclusions Chapter 3.1: Alternatives to the Project

No Project	Heavy Maintenance/ Climate Protection	Heavy Maintenance/ Climate Protection + Pricing	Heavy Maintenance/ Climate Protection + Land Use
Less adverse affect on critical habitats compared to the proposed Project	Less adverse affect on critical habitats compared to the proposed Project	Less adverse affect on critical habitats compared to the proposed Project	Substantially less adverse affect on critical habitats compared to the proposed Project
Less adverse construction-related impact on nonlisted nesting raptor species compared to the proposed Project	Less adverse construction-related impact on nonlisted nesting raptor species compared to the proposed Project	Less adverse construction-related impact on nonlisted nesting raptor species compared to the proposed Project	Substantially less adverse construction- related impact on nonlisted nesting raptor species compared to the proposed Project
Comparable level of conflict with adopted resource protection or conservation plans, compared to the proposed Project	Comparable level of conflict with adopted resource protection or conservation plans, compared to the proposed Project	Comparable level of conflict with adopted resource protection or conservation plans, compared to the proposed Project	Comparable level of conflict with adopted resource protection or conservation plans, compared to the proposed Project
Less contribution to removal or fragmentation of habitat area compared to the proposed Project	Less contribution to removal or fragmentation of habitat area compared to the proposed Project	Less contribution to removal or fragmentation of habitat area compared to the proposed Project	Substantially less contribution to removal or fragmentation of habitat area compared to the proposed Project
and the second second			
Less impact on visual resources during construction, compared to the proposed Project	Less impact on visual resources during construction, compared to the proposed Project	Less impact on visual resources during construction, compared to the proposed Project	Less impact on visual resources during construction, compared to the proposed Project
Less potential to block public views or change the visual character and quality of designated or eligible State Scenic Highways, compared to the proposed Project	Less potential to block public views or change the visual character and quality of designated or eligible State Scenic Highways, compared to the proposed Project	Less potential to block public views or change the visual character and quality of designated or eligible State Scenic Highways, compared to the proposed Project	block public views or change the visual character and quality of designated or
	Less adverse affect on critical habitats compared to the proposed Project Less adverse construction-related impact on nonlisted nesting raptor species compared to the proposed Project Comparable level of conflict with adopted resource protection or conservation plans, compared to the proposed Project Less contribution to removal or fragmentation of habitat area compared to the proposed Project Less impact on visual resources during construction, compared to the proposed Project Less potential to block public views or change the visual character and quality of designated or eligible State Scenic Highways, compared to the proposed	No ProjectClimate ProtectionLess adverse affect on critical habitats compared to the proposed ProjectLess adverse affect on critical habitats compared to the proposed ProjectLess adverse construction-related impact on nonlisted nesting raptor species compared to the proposed ProjectLess adverse construction-related impact on nonlisted nesting raptor species compared to the proposed ProjectComparable level of conflict with adopted resource protection or conservation plans, compared to the proposed ProjectComparable level of conflict with adopted resource protection or conservation plans, compared to the proposed ProjectLess contribution to removal or fragmentation of habitat area compared to the proposed ProjectLess contribution to removal or fragmentation of habitat area compared to the proposed ProjectLess impact on visual resources during construction, compared to the proposed ProjectLess impact on visual resources during construction, compared to the proposed ProjectLess potential to block public views or change the visual character and quality of designated or eligible State Scenic Highways, compared to the proposedLess potential to block public views or change the visual character and quality of designated or eligible State Scenic Highways, compared to the proposedLess potential to block public views or change the visual character and quality of designated or eligible State Scenic Highways, compared to the proposed	No ProjectHeavy Maintenance/ Climate ProtectionClimate Protection + PricingLess adverse affect on critical habitats compared to the proposed ProjectLess adverse affect on critical habitats compared to the proposed ProjectLess adverse affect on critical habitats compared to the proposed ProjectLess adverse construction-related impact on nonlisted nesting raptor species compared to the proposed ProjectComparable level of conflict with adopted resource protection or conservation plans, compared to the proposed ProjectComparable level of conflict with adopted resource protection or conservation plans, compared to the proposed ProjectComparable level of conflict with adopted resource protection or conservation plans, compared to the proposed ProjectComparable level of conflict with adopted resource protection or conservation plans, compared to the proposed ProjectLess contribution to removal or fragmentation of habitat area compared to the proposed ProjectLess impact on visual resources during construction, compared to the proposed

/		• •	
No Project	Heavy Maintenance/ Climate Protection	Heavy Maintenance/ Climate Protection + Pricing	Heavy Maintenance/ Climate Protection + Land Use
Less potential for construction of soundwalls to alter views, compared to the proposed Project	Less potential for construction of soundwalls to alter views, compared to the proposed Project	Less potential for construction of soundwalls to alter views, compared to the proposed Project	Less potential for construction of soundwalls to alter views, compared to the proposed Project
Less of a potential to disturb, destroy, or significantly affect cultural resources, compared to the proposed Project	Less of a potential to disturb, destroy, or significantly affect cultural resources, compared to the proposed Project	Less of a potential to disturb, destroy, or significantly affect cultural resources, compared to the proposed Project	Substantially less of a potential to disturb, destroy, or significantly affect cultural resources, compared to the proposed Project
Less of a potential to disturb, destroy, or significantly affect historic resources, compared to the proposed Project	Less of a potential to disturb, destroy, or significantly affect historic resources, compared to the proposed Project	Less of a potential to disturb, destroy, or significantly affect historic resources, compared to the proposed Project	Less of a potential to disturb, destroy, or significantly affect historic resources, compared to the proposed Project, bu somewhat more thar the other alternative
	Less potential for construction of soundwalls to alter views, compared to the proposed Project Less of a potential to disturb, destroy, or significantly affect cultural resources, compared to the proposed Project Less of a potential to disturb, destroy, or significantly affect historic resources, compared to the	No ProjectClimate ProtectionLess potential for construction of soundwalls to alter views, compared to the proposed ProjectLess potential for construction of soundwalls to alter views, compared to the proposed ProjectLess of a potential to disturb, destroy, or significantly affect cultural resources, compared to the proposed ProjectLess of a potential to disturb, destroy, or significantly affect cultural resources, compared to the proposed ProjectLess of a potential to disturb, destroy, or significantly affect significantly affectLess of a potential to disturb, destroy, or significantly affect proposed ProjectLess of a potential to disturb, destroy, or significantly affect historic resources, compared to theLess of a potential to disturb, destroy, or significantly affect historic resources, compared to the	Heavy Maintenance/ Climate ProtectionClimate ProtectionNo ProjectClimate ProtectionPricingLess potential for construction of soundwalls to alter views, compared to the proposed ProjectLess potential for construction of soundwalls to alter views, compared to the proposed ProjectLess potential for construction of soundwalls to alter views, compared to the proposed ProjectLess of a potential to disturb, destroy, or significantly affect cultural resources, compared to the proposed ProjectLess of a potential to disturb, destroy, or significantly affect cultural resources, compared to the proposed ProjectLess of a potential to disturb, destroy, or significantly affect cultural resources, compared to the proposed ProjectLess of a potential to disturb, destroy, or significantly affect proposed ProjectLess of a potential to disturb, destroy, or significantly affect historic resources, compared to the proposed ProjectLess of a potential to disturb, destroy, or significantly affect historic resources, compared to theLess of a potential to disturb, destroy, or significantly affect historic resources, compared to theLess of a potential to disturb, destroy, or significantly affect historic resources, compared to the

# **Appendix A:**

Notice of Preparation (NOP)

# 3.2 CEQA Required Conclusions

This chapter summarizes the impacts of the proposed Transportation 2035 Plan in several subject areas specifically required by CEQA, including significant irreversible changes, significant unavoidable impacts, cumulative impacts, and impacts found to be not significant. These subject areas are evaluated based on the analysis in *Part Two: Settings, Impacts, and Mitigation Measures*, of this EIR.

#### SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

Significant irreversible environmental changes are those irretrievable commitments that consign non-renewable resources to uses that future generations will probably be unable to reverse. Irretrievable commitments of non-renewable resources associated with the transportation improvements in the proposed Transportation 2035 Plan would include:

- Consumption of significant amounts of nonrenewable energy for construction, maintenance, and operation of transportation improvements, even if energy use rates do not exceed existing use rates;
- Use of building materials, fossil fuels, and other resources for construction, maintenance and operation of transportation improvements; and
- Conversion of some resource lands, such as agricultural land, habitat areas, and other undeveloped lands into transportation uses.

#### SIGNIFICANT UNAVOIDABLE IMPACTS

Significant unavoidable impacts are those that cannot be mitigated to a level that is less than significant. *Part Two* of this EIR identified the following significant unavoidable impacts when comparing the proposed Transportation 2035 Plan to existing conditions:

- Increased vehicle miles traveled at Level of Service F for freeways, expressways, and arterial facilities;
- Increased construction-related emissions of criteria pollutants;
- Increased PM<sub>10</sub> and PM<sub>2.5</sub> emissions;
- Individually and cumulatively considerable conversion of farmland, including prime agricultural land designated by the State of California, to transportation use;
- Disruption or displacement of existing land uses, neighborhoods, and communities in the short-term;
- Cumulatively considerable increase in noise levels along some travel corridors;
- Adverse effects on special-status plant and/or wildlife species identified as endangered, candidate, and/or special status by the CDFG or USFWS;
- Cumulatively considerable conversion of undeveloped land to urban uses, contributing to the removal or fragmentation of habitat area;

• Individual and cumulative degradation of visual resources by adding or expanding development in rural or open space areas, blocking views from adjoining areas, blocking or intruding into important vistas, and changing the scale, character, and quality of designated or eligible Scenic Highways.

#### **CUMULATIVE IMPACTS**

In this EIR, the cumulative impact analysis considers the possible effects of all the projects in the proposed Transportation 2035 Plan together with projected regional growth and the increase in regional travel produced by the Bay Area's growth in population and jobs as presented in ABAG's *Projections 2007.* This kind of cumulative impact is not specific to the Bay Area, but is characteristic of any area that is experiencing population and employment growth. The Transportation, Air Quality, Energy, Greenhouse Gas, and Noise impact analyses are all cumulative in nature because the indicators being measured (e.g. vehicle miles traveled, emissions, noise) are the result of many interrelated activities and the significance of the proposed Transportation 2035 Plan is only apparent when it is considered in conjunction with those wider regional development patterns.

Significant cumulative impacts are identified by issue area in *Part Two: Settings, Impacts, and Mitigation Measures*, and summarized again here. The proposed Project's contribution to the cumulative impact is also indicated in italics.

- Vehicle miles traveled at Level of Service F would increase for both freeways and expressways and arterial facilities when compared to existing conditions (*Project Contribution Not Cumulatively Considerable*);
- Implementation of Transportation 2035 Plan projects, combined with projected regional growth, would result in increased emissions of PM<sub>10</sub> and PM<sub>2.5</sub> over existing conditions (*Project Contribution Not Cumulatively Considerable*);
- Concurrent implementation of the proposed Transportation 2035 Plan and forecast development would result in cumulatively considerable conversion of Prime and Important farmlands to urban use throughout the Bay Area (*Project Contribution Cumulatively Considerable*);
- Implementation of Transportation 2035 Plan projects, combined with forecast regional growth, would contribute to GHG emissions (*Project Contribution Not Cumulatively Considerable*);
- Transportation 2035 Plan projects, combined with future forecast development in the region, have the potential to result in a cumulatively considerable increase in exposure to risk related to sea level rise (*Project Contribution Not Cumulatively Considerable*);
- Implementation of transportation projects included in the proposed Transportation 2035 Plan, combined with traffic related to projected regional population and employment growth, could result in a cumulatively considerable increase in overall noise levels along some travel corridors (*Project Contribution Cumulatively Considerable*);
- The proposed Transportation 2035 Plan, combined with regional population growth, would result in an increased risk of exposure of people and property to geologic hazards (*Project Contribution Not Cumulatively Considerable*);

#### Chapter 3.2: CEQA Required Conclusions

- Concurrent implementation of the proposed Transportation 2035 Plan and projected regional development could contribute to degradation of regional water quality, reduction of groundwater recharge, or result in increased flooding hazards (*Project Contribution Not Cumulatively Considerable*);
- Transportation 2035 Plan projects, combined with forecast urban development, could contribute to the removal or fragmentation of habitat area (*Project Contribution Cumulatively Considerable*); and
- Concurrent implementation of the proposed Transportation 2035 Plan and regional and local land use plans would result in a cumulatively considerable change in the visual character of many areas in the region (*Project Contribution Cumulatively Considerable*).

#### IMPACTS FOUND NOT TO BE SIGNIFICANT

This EIR focuses on potentially significant impacts. CEQA requires that an EIR provide a brief statement indicating why various possible significant impacts were determined to not be significant and were not discussed in detail. For the issue areas addressed in *Part Two*, all potential impacts are identified, regardless of their magnitude. Issue areas determined to not be significant and not addressed in this EIR include the following.

#### HAZARDOUS MATERIALS

Hazardous materials are already highly regulated at the federal and State level. The existing regional transportation system already carries vehicle that transport hazardous materials. It was determined that the changes proposed to the transportation system through the Transportation 2035 Plan are *de minimis* as they relate to changes in the handling, location of, or exposure to hazardous materials. If a specific transportation project were to be adjacent to a hazardous materials site, a project-specific environmental document would address the impact. No significant impacts related to hazardous materials are expected to occur as a result of the proposed Transportation 2035 Plan.

#### MINERAL RESOURCES

The proposed Transportation 2035 Plan will not affect mineral resources, as no substantive mineral resources have been identified in areas where new transportation improvements will occur.

#### **PUBLIC SERVICES AND UTILITIES**

Implementation of the proposed Transportation 2035 Plan will not cause a significant increase in demand for public services or utilities.

#### RECREATION

No significant adverse effects on recreational uses or facilities are expected. Minor, short-term adverse effects may occur if proposed Transportation 2035 projects are constructed near recreational facilities.

This page intentionally left blank.