

February 25, 2020

Bay Area Metro
375 Beale Street
San Francisco, CA 94105

Re: Plan Bay Area 2050 Draft Blueprint Growth Geographies and Growth Strategies (Item 9b)

Dear Chair Haggerty and Members of the Metropolitan Transportation Commission,

Thank you for the opportunity to provide comments on Plan Bay Area 2050's draft growth geographies and draft growth strategies. SPUR has long participated in and commented on Plan Bay Area because it is an important regional vision that local governments can look to when making land use and development decisions. Plan Bay Area 2050 is particularly monumental for incorporating strategies to address economic inequality and climate change, and we commend the Commission and staff for their leadership on these critically important issues.

The region's growing inequality and the potential failure to meet our greenhouse gas emissions targets should be a wake-up call. Our lack of housing and infrastructure funding and inability to prepare for climate change is a crisis—one that already puts the most burden on the region's most vulnerable residents. Now is the time to commit to a bold vision and policy changes that can help the region pivot to a brighter future.

I. Draft Growth Geographies

- 1. SPUR strongly supports ABAG's decision to designate priority development areas in transit-rich and high-resource locations if cities do not do so themselves.** This is the bold leadership that the Bay Area needs in order to make sure that planning decisions truly work for all.
 - a. We commend the City of San Francisco for nominating several new locations for growth, particularly along current and future transit and on the west side of the city.** This is an important step in the right direction for San Francisco and the region.
 - b. We strongly encourage locating growth in high-resource areas.** Everyone must do their part. Only 6% of Priority Development Areas from Plan Bay Area 2040 were located in areas of high opportunity, reflecting a long history of policy decisions that have disadvantaged people of color and low-income people. It is imperative that Plan Bay Area 2050 correct for this history and reverse the trend of growing inequality and re-segregation.
 - c. We strongly suggest locating new growth around transit stations in all counties.** Locating growth near transit generates riders and is one the best ways to ensure that the transit is successful and that the public investment is cost-effective. The Bay Area's costs to build transit are among the highest in the world. MTC should do everything in its

power to ensure that its public investments are responsibly spent, and this includes locating new growth around those investments.

- d. **In addition to adopting Priority Conservation Areas, we strongly encourage Plan Bay Area to include a clear statement of principles that the Bay Area should enact strong policies to protect development in agricultural, open space and habitat land.** These include enactment and enforcement of urban growth boundaries, limits on the expansion of urban service areas, advance mitigation planning, and acquisition of park and habitat land.

2. The impact of Plan Bay Area will depend heavily on how MTC uses its authority to implement and enforce Plan Bay Area and the growth geographies. To that end:

- a. **We strongly encourage MTC to make transportation funding conditional on cities and counties having completed PDA plans** in both transportation-rich areas and high-opportunity areas plans and commensurate zoning in place.
- b. **We support the recommendations of NPH, Transform and Urban Habitat to lay out actionable strategies to incentivize local jurisdictions to plan for and build more affordable homes** for people with very-low and extremely low-incomes and invest significant resources to build those homes.

II. Draft Growth Strategies

Overall, SPUR supports the direction of the staff memo and the strategies outlined. We also offer the following twelve strategies for your consideration to include and study in the draft blueprint.

Theme	SPUR's Additional Recommendations
Maintain and Optimize Existing Infrastructure	1. We recommend including additional strategies to price driving , which can help make transportation funding more fair, make transit faster for all, and reduce our reliance on driving. Given the potential to fail to meet our greenhouse gas emissions target, this is a good opportunity to think comprehensively about what we should explicitly pay for and what we should be able to access for free. This includes broader pay-per-mile road user charges, dynamic pricing, implementing tolling or area pricing in congested downtowns, and creating a framework to align tolling practices and payment options. Any policy can be designed to support equity and we should not assume that current conditions are equitable, as they already burden low-income people with high costs and poor health, often for life.

Create Healthy and Safe Streets	2. We recommend emphasizing reducing speed through street design as a way to implement and enforce healthy and safe streets.
Enhance Regional and Local Transit	3. SPUR recommends fully funding the highest priority projects that serve the most riders and are core to the functioning of our regional economy. When we fail to select and fully fund the highest priority projects, it can lead to increased costs and longer timelines—and we must continue to live with crowding and unreliable transit. Additionally, we caution that there is some danger in choosing only projects that meet all scenarios of the future. Though this may make for a prudent financial investment, it can trend towards the lowest common denominator rather than real transformation.
Spur Housing Production and Create Inclusive Communities	4. SPUR encourages MTC to explore true statewide growth legislation to accomplish the goals of spurring housing production, reducing environmental impacts, and shifting the location of jobs. Models include Washington and Oregon, where local plans must be consistent with the regional plan.
Protect, Preserve and Produce More Affordable Housing	5. Create more tools to encourage development in the right places , such as conditioning transportation funding on planning for housing and statewide growth legislation. 6. SPUR recommends that MTC consider evaluating strategies that help preserve affordable housing and reduce the potential for displacement.
Shift the Location of Jobs	7. SPUR recommends reducing exploring bolder tools such as exploring tax-base sharing and a true statewide growth legislation to reduce competition between cities for jobs and shape where jobs locate.
Reduce Risks from Hazards	MTC has a powerful role to play in helping cities and counties adapt to multiple climate hazards. 8. Fund MTC’s Regional Advanced Mitigation Program. In 2017, MTC adopted a regional advanced mitigation program to help transit agencies, cities and counties meet their mitigation requirements for new infrastructure projects while achieving landscape-scale conservation benefits for wildlife and habitat. Though this program was created, it is unfunded. We recommend allocating funding to this program to both conserve and restore sensitive areas and expedite project delivery. 9. MTC, ABAG, BCDC and partner agencies should develop regional guiding principles and consistency framework for certifying local planning efforts and recommending them for funding. The recently

	<p>launched Regional Shoreline Adaptation Strategy (RSAS) is a start and should be completed and implemented as soon as possible.</p> <p>10. MTC and ABAG should develop a regional funding model and Regional Adaptation Plan to prioritize projects and the funding to implement them. This would follow RSAS. Funding should be conditional upon counties' demonstration of project consistency with the regional platform and with local OLU-based plans and consider fiscal constraints, as is done in the RTP process. The Regional Adaptation Plan should be updated every five years and the funding model should draw on federal, state and regional Draft Growth funds. Working with Caltrans, MTC should also assume primacy for planning for regionally significant infrastructure, such as highways that cross multiple OLUs, to ensure consistency.</p> <p>11. MTC and ABAG can create a regional lifelines council to identify interdependencies between infrastructure systems, assess their vulnerability to hazards, set regionwide mitigation priorities and identify ways to fund critical upgrades in the next 10 years. Hazard performance standards and regulatory requirements for lifelines vary across different infrastructure owners and operators and there are many gaps. This is problematic for cascading impacts of disasters, which may be more damaging than the original event.</p>
Improve Economic Mobility	<p>12. We support the strategies and recognize that MTC will have to work through partnerships to achieve many of these strategies. We also encourage MTC to identify and test strategies for individual and community wealth-building as the region grows.</p>

Thank you for the opportunity to provide comments on Plan Bay Area's Draft Growth Geographies and Strategies. This is a critically important time in the Bay Area's history and it is incumbent on all of us to look at how our growing region will be able to thrive in a world with warmer temperatures and higher sea levels, with several million more residents.

Sincerely,

Laura Tolkoff
Regional Planning Policy Director