



## *Planning Committee* **STAFF REPORT**

Meeting Date: July 5, 2012

### **SB 375/SCS Implementation Update: Approve Transmittal of Comment Letter on the Scope of the OneBayArea Plan DEIR**

**MTC Releases NOP for Draft EIR for Plan Bay Area:** Following MTC/ABAG's decision on May 23, 2012 to proceed with development of the 2013 Draft RTP EIR, MTC has released a Notice of Preparation (NOP) for the Plan Bay Area Draft EIR. The NOP is intended to seek comments on the scope and content of the environmental review that will be evaluated in the EIR. Scoping meetings were held in Oakland, San Jose, San Francisco, and San Rafael during June. The Contra Costa Council sent a comment letter regarding the selection of the alternatives to be evaluated in the Draft EIR (see June Authority packet). A full copy of the NOP is available at: [http://www.onebayarea.org/pdf/NOP\\_060812\\_final.pdf](http://www.onebayarea.org/pdf/NOP_060812_final.pdf)

At the June Authority meeting, staff was instructed to prepare a comment letter on the NOP to be reviewed by the PC in July and signed by Chair Tatzin. Authority staff has prepared a draft letter as shown in Attachment A. Staff seeks Planning Committee concurrence to transmit the letter, which is due to MTC by July 11, 2012.

**Regional Advisory Working Group (RAWG):** The RAWG met on June 5, 2012 to discuss the challenges of meeting affordable housing requirements. Jeff Levin from the City of Oakland spoke about various strategies that the City was using to promote infill affordable housing. He underscored that the elimination of Redevelopment Agencies had significantly impaired the City's progress towards meeting its affordable housing goals. ABAG staff also presented two new "place types": Rural Investment Areas, and Economic Investment Areas. The next RAWG meeting is scheduled for July 10, 2012.

**OneBayArea Grant (OBAG) Program:** In July, the Planning Committee and Authority will discuss the OBAG program, which was finalized by MTC/ABAG in May. The OBAG proposal was formally adopted through MTC Resolution No. 4035. The final resolution is available at: [http://www.mtc.ca.gov/funding/onebayarea/RES-4035\\_approved\\_unsigned.pdf](http://www.mtc.ca.gov/funding/onebayarea/RES-4035_approved_unsigned.pdf)

**CMA Director Meetings:** The CMA directors met with MTC/ABAG staff on June 20 to initiate the consultation process with MTC for amending the scope of activities identified in the OBAG PDA Investment & Growth Strategy. Additional meetings are scheduled in July.



## COMMISSIONERS

July 5, 2012

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**Subject: Notice of Preparation of a Draft Environmental Impact 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, 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

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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.

If MTC insists on using this tool, it must make the assumptions and process thoroughly transparent and open to the scrutiny of its CMA 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 in-commuting 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?

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 inter-regional 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

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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.*

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,

DRAFT

Don Tatzin  
Chair

cc:

File: