



West Bay Citizens Coalition

Empowering West Bay communities to find
locally driven solutions to regional problems

February 28, 2020

Metropolitan Transportation Commission
Board of Directors
375 Beale Street
San Francisco, California

Association of Bay Area Governments
Executive Committee
375 Beale Street, Suite 700
San Francisco, CA 94105

Dear Board and Committee Members:

The West Bay Citizens Coalition (WBCC) is writing to provide you notice of serious deficiencies in the methodology and processes used to promulgate Plan Bay Area 2050. The fact that HCD and MTC/ABAG proceeded to develop the 2050 Plan without a critical analysis of the flaws in the methodology and processes of the 2040 Plan is frankly inexcusable in view of its blatant inaccuracies.

We wrote to you and testified at public hearings asking you to promote an open discussion of alternative measures described in the Government Codes to avoid the disastrous forecasting errors of Plan Bay Area 2040. You ignored our pleas for a thorough analysis of the Plan Bay Area 2050 methodology and the processes outlined in the Codes.

FAILURE OF MTC/ABAG AND HCD TO COMPLY WITH RELEVANT STATUTES

Accordingly, we wish to provide notice that we, the members of the WBCC, find HCD and MTC/ABAG have failed in their statutorily mandated duty to “improve intraregional jobs-housing imbalances.” HCD and MTC/ABAG failed to faithfully adhere to the requirements of the following sections of the relevant Government Code when promulgating Plan Bay Area 2050 to the resulting severe detriment of the West Bay Area:

1. Section 65584 (d) (3) of the California Government Code states that the Regional Plan process of the regional government body shall cooperate with the relevant state agencies and the public, **pay special attention to the local jobs-housing imbalances, and look for incentives that will “promote an improved intraregional relationship between jobs and housing.”**

*Campbell, Cupertino, Los Altos, Menlo Park, Mountain View, Palo Alto,
Redwood City, Santa Clara, Saratoga, Sunnyvale... and growing*

MTC/ABAG failed to cooperate with the public and failed to “pay special attention to the local jobs-housing imbalance.” The Regional Plan process specifically failed to fully address incentives that could “improve the interrelationship between jobs and housing.”

2. Section 65584.04 (d) (e) requires that **the data considered shall include “each member jurisdiction’s existing and projected jobs and housing relationship...as well as an estimate based on readily available data, of projected job growth and projected housing growth during the planning period.”**

WBCC’s membership includes City Council Members, Mayors and other elected and appointed officials from the West Bay Area cities. We are uniquely qualified to testify that MTC/ABAG did not address troubling local jobs-housing imbalances emerging in the West Bay by offering local options for individual cities working to achieve a better jobs-housing balance.

3. Section 65584.01 (b) mandates cooperation among the Department of Housing and Community Development (HCD), the Department of Finance (DOF), and the regional council of governments (MTC/ABAG). For example, **HCD’s housing projection “shall be based upon population projections** produced by the Department of Finance and regional forecasts used in preparing the regional transportation plans, **in consultation with each council of government.”**

There was no effective public discussion of the troubling intensity of job growth in the West Bay and lack of job growth in Oakland and San Jose and other East Bay cities. Failure is predictable if your projections failed to address readily available relevant data that have been repeatedly shared at public meetings.

4. Further, 65584.01 (c) (1) (F) requires that HCD “**should consult with the council of governments...who shall provide data assumptions from the council’s projections...on the relationship between jobs and housing, including any imbalance between jobs and housing**”. Ultimately, HCD must make a written report to the council of governments that determines “**whether the methodology furthers the objectives listed in subdivision (d) of Section 65584**” (i.e., “**promoting an improved intraregional relationship between jobs and housing**”). (65584.04 (i))

While HCD does consult with local communities on the zoning requirements for the number of affordable housing units, neither HCD nor MTC/ABAG carried out a public discussion about the appropriate number of new jobs or new housing units needed by new workers – instead those numbers were developed through in-house models that allow for housing and commercial space to compete “in profitable locations.” Thus, we are rightly concerned that the flawed forecasts of Plan Bay Area 2040 will be replicated in the 2050 Plan.

5. Section 65584.04 (d) of the Code specifies that **“public participation and access shall be required in the development of the methodology of the allocation of regional housing needs”**.

MTC/ABAG held a series of public meetings but failed to provide any current data that tracks new jobs and new housing in jobs-rich areas. Their analysis in looking at alternative such as city sponsored “jobs-caps” consisted of using their own model that tracks “the profitability of new office space” and concluding that caps were not to be considered because they “might push some jobs out of the Bay Area” (based on a “1990 American Planning Journal” article).

6. Finally, Section **65890.5** requires HCD to prepare and publicly distribute a **Guidebook that would present “methodologies for measuring the balance of jobs and housing” and identifying “incentives which local, regional and state agencies may offer the private sector to encourage developments which will facilitate an improved balance between employment generating land use and residential land use.”**

HCD failed to prepare and publicly distribute this Guidebook. Thus, there are few options for any serious exploration of alternatives within HCD’s and ABAB’s methodologies for measuring the balance of jobs and housing. Similarly, there is no serious consideration of other types of incentives that other regional and local governments may be using. This failure contravenes the legislature’s mandate to prepare a range of forecasts that local governments may consider.

The damages to the West Bay caused by the deficient and inaccurate methodology and processes of Plan Bay Area 2040 are legion. WBCC hereby provides HCD and MTC/ABAG with notice of some of the most obvious and incontrovertible damages caused by the huge and growing intraregional jobs-housing imbalance in the West Bay and the critical consequences of that imbalance.

The current Plan Bay Area 2040 is based on a jobs-driven model. It starts with a regional job growth projection that seeks to concentrate growth in jobs-rich priority development areas.[1] It has asserted that a rapid growth of new jobs would be spread in urban centers around the Bay Area while an effective transit system could make these job centers flourish effectively.

Through the first eight years of the Plan (2010-2018), the result has been quite the opposite: very rapid job growth has been concentrated in a dramatically narrow band of West Bay cities. (The West Bay includes the city of San Francisco, the six cities that have been associated with Silicon Valley – Menlo Park, Palo Alto, Mountain View, Sunnyvale, Santa Clara and Cupertino, and all the San Mateo County cities that touch on Highway 101 between San Francisco and Menlo Park).

The original intention of Plan Bay Area was to concentrate job growth in the three big cities of the Bay Area—San Francisco, San Jose and Oakland and in the original Silicon Valley area. While San Francisco and the neighboring Silicon Valley cities would be the fastest growing job center, together San Jose and Oakland would create about half as many new jobs each year as the West Bay.

In practice, during the first eight years of the Plan 2010 – 2018, the West Bay has added well over SEVEN TIMES the number of jobs as San Jose and Oakland over the first seven years of the Plan (Table 1).

Table 1 The Projections in the Plan Haven't Worked (average annual job growth)

	Projected (2010-2040)	Actual (2010-2018)
West Bay	19,857	36,815
Oakland/San Jose	7,717	4,970

Source: Plan Bay Area: Strategy for a Sustainable Future (July 2013), "Employment Growth by Jurisdiction;" and Census Bureau, ACS Factfinder (Advanced search on B08601)

In actuality, over the eight years from 2010 to 2018 San Francisco and the cities of the West Bay have created about two and a half times the number of new jobs compared to the rest of the whole Bay Area. Half of those new jobs have been filled by commuters crossing the Bay or travelling along the narrow and congested pathways from the south.

The rapid job growth in a relatively constrained strip of land bounded by mountains on one side and the Bay on the other has resulted in severe problems: land and housing costs are the highest in the country, congestion is escalating, there are disturbing inequalities in incomes, family workers are commuting longer distances, overloaded regional transit systems need major upgrades, and commute times are increasing. We are facing new challenges in our ability to create a sustainable future and the functioning of local democracy is under challenge.

TEN PROBLEMS THAT MUST BE ADDRESSED

There are at least ten major economic, financial and societal problems that flow from the concentrated job growth and increased congestion engendered by the serious imbalances we have identified:

LAND PRICES

The rapid expansion in business growth in jobs-rich areas has driven up the cost of land and the share of land costs in total housing prices. A recent Federal Reserve study has tracked land cost escalation in 46 metro areas around the country. They found that in the 46 metro areas, land's share of home value accounted for 51% of total market value of home prices. The highest share was in the San Francisco metro area where over 88% of the market value of a home was accounted for by land. The San Jose metro area was a close second with 82%. [2]

In general the cities in California were well ahead of the rest of the country in land price share. This is clearly driven by the aggressive expansion of office space in the West Bay.

HOUSING PRICES

Home prices in San Francisco and in the San Jose Metro area are now the highest in the country. The same is true of rental rates for apartments (Table 2).

Table 2 The Bay Area has the most expensive housing in the Country (Metro Areas)

	Median Housing Prices (Thousands of Dollars)	Monthly Rentals (Dollars/Month)
San Francisco	955	3448
San Jose	1,230	3547
Los Angeles	652	2955
Seattle	491	2232
Boston	468	2391
New York	440	2419
Washington DC	407	2172
Austin	310	1700
Dallas	244	1641

Zillow, February 2019

Prices are especially high in the job-rich cities of the West Bay. But the rate of increase is just as high in the surrounding communities that feel the commuting effects from the centers of job growth (Table 3). The housing price impact has spread to every part of the Bay Area.

Table 3 Increase in Housing Prices Throughout the Bay Area (annual percent increase in median family home prices, 2010-2018)

The Core	
Silicon Valley 6	11.4
San Francisco	10.2
Surrounding Communities	
San Jose	10.1
Milpitas	12.9
Fremont	10.3
Hayward	10.4
Oakland	12.9
Concord	10.4

Source: siliconvalleymls.com

INCOME INEQUALITY

Highly paid new workers are taking the existing housing that is being offered on the markets as well as the new housing being built. A recent study by Brookings showed that of all US Metro areas that San Francisco had the largest income gap between the 95th and 20th percentiles other than the New York area. While the San Jose Metro area income gap was slightly lower, it was growing at the second highest rate in the country in recent years (just behind Honolulu).[3]

A recent Census Bureau report noted that the income gap between the 90th and the 50th percentiles were growing at about the same rate as the gap between the highest and the lower income groups.[4]

CONGESTION

More people commuting longer distances have crowded local freeways on both sides of the Bay. The time spent in congested traffic conditions throughout the Bay Area has been growing almost 10% per year since 2010.[5]

TRANSIT OVERLOAD

The key to dealing with the growing number of commuters is to get them onto public transit. Three transit systems serve commuters to the West Bay: BART, Caltrain and the VTA. While transit ridership on these lines grew through the 1990s and 2000s, over the last three years, both BART and Caltrain have found their ridership leveling off and even dropping a bit from 2016 to 2018.

The Santa Clara County transit system that services San Jose and the five Silicon Valley cities (VTA) has had a 14% fall in ridership over those three years.[6] The costs of maintaining current service much less any planned expansion has escalated rapidly, making quick improvements slow and costly.

IMPACT ON FAMILIES

As we move toward greater densification, congestion has raised the issue of family living in the Bay Area. Denser apartment buildings near jobs serve workers well, but they are not ideal for families with children. Clearly San Francisco with its dense housing and nineteenth century transportation system is already an outlier. It has the lowest ratio of children between the ages of five and seventeen as a share of the total population of any city in the country—just under the ratio of other dense cities built up before the automobile like New York and Boston.

But there are also troubling signs of changes in other cities in the West Bay. The share of the population between the ages of five and seventeen has fallen by 30 to 50% faster in Palo Alto and Redwood City than in California as a whole and more than twice as fast in Santa Clara and Daly City. [7]

TAX BURDEN ON RESIDENTS

Rapid growth in jobs and workers leads to dramatic increases in infrastructure costs. This includes a wide range of items from worker housing, transit improvements, offsetting increased congestion, improved roadways, police, health responses, schools and recreation facilities. The vast majority of local infrastructure funding is paid by residents, not by businesses. Residents pay through higher property taxes, parcel taxes, sales taxes, and gas taxes.

For example, the base tax for all local government (cities, counties, schools, community colleges) is the Property Tax. Prop 13 has shifted a major share of that tax from business to residents. In the mid-1980s, commercial properties and residences in Santa Clara County paid roughly the same share of the property tax. In 2018 despite the rapid growth in new jobs in the county, property taxes paid by residents was 62% and it was 38% for commercial properties. [8]

Furthermore, at least three quarters of all new transportation funds for the Bay Area come from local and regional sources that fall primarily on individual residents such as gas taxes, sales taxes, parcel taxes and property taxes.[9] Most of these are regressive taxes with middle and lower income people paying a larger share of their income for such taxes.

DON'T KILL SILICON VALLEY

Silicon Valley emerged as a dynamic center of tech innovation partially because of its unique features of mobility both of talented workers and ideas flowing easily from place to place. Historical observers have pointed to two features of the Valley that were critical to its success: a very high rate of people changing jobs and the lack of large dominant firms that could capture new ideas as they emerged.[10]

The emergence of very large companies and the densification jobs within the Valley is challenging the traditional mobility of workers and ideas that lie at the basis of Silicon Valley's unique success.

If you look at the nine-county Bay Area as a whole, there is a rough balance between jobs and employed residents. However the West Bay jobs-rich "sub-region" is severely out of balance. The West Bay "sub-region" that includes San Francisco, the six cities of the original Silicon Valley—Menlo Park, Palo Alto, Mountain View, Sunnyvale, Cupertino, and Santa Clara—and the connecting cities in San Mateo along Highway 101.

When Plan Bay Area 2040 was created, the West Bay already had a base ratio of about 1.4 new jobs for every new employed resident (1.4:1). But in the years since 2010 this ratio has increased dramatically. Between 2010 and 2018, the West Bay has added well over 250,000 new jobs. These new jobs accounted for 65% of the new jobs added in the entire nine county Bay Area although the West Bay accounts for only 26% of the total Bay Area population.

From 2010 to 2018, this critical ratio of new jobs to new employed residents has risen dramatically in the West Bay while it has fallen in neighboring cities and counties (see Table 4).

Table 4 Ratio of New Jobs to New Employed Residents (2010-2018)

Location - city or county	Ratio of new jobs to new employed residents
Nine County Bay Area	1:1
West Bay	2.1:1
San Francisco	2:1
San Mateo (along Hwy 101)	1.1:1
Silicon Valley (6 Cities)	3.3:1
(Menlo Park, Palo Alto, Mt View)	6.1:1
Oakland	0.2:1
San Jose	0.4:1
Alameda County (not including Oakland)	0.3:1
Contra Costa County	0.4:1

Source: US Census Bureau, data.census.gov

The data clearly show a growing concentration of jobs in a single part of the Bay Area, the West Bay. Moreover, while the West Bay has created twice the number of new jobs forecasted by Plan Bay Area 2040, the two large cities, San Jose and Oakland combined, created forty percent fewer jobs than it forecasted.

SUSTAINABLE GROWTH GOALS

With the dramatic increase in commuters coming into the job-rich West Bay, the number of cars on the road, the distance traveled, and the longer time spent in congested traffic all mean a rise in harmful emissions. It is essential that we develop an effective public transportation system that will minimize the pollution, but it is hard to deal with our current problems when we keep adding longer-distance commuters.

An increasing share of workers with families will continue to live in suburban communities. Further, increased water needs from the growing number of office buildings and new worker housing (especially those with families) means that the Bay Area’s chronic water shortages will be exacerbated as changes in climate impact the limited sources of water that the Bay Area depends upon.

THE FUTURE OF LOCAL DEMOCRACY

The greatest threat of all is the increasing pressure to usurp local government control over zoning. A number of bills have been passed or are being debated in the state legislature that would override local zoning authority on housing density. While regional cooperation on creating healthy balances between new jobs and housing is essential, this should be done through working together, not from having regional solutions imposed by state legislators. This destroys the very essence of local government—the ability of individuals to participate directly in decisions that affect the daily family life of their communities.

LET'S MAKE SURE THAT PLAN BAY AREA 2050 WORKS

The planning process used in the formulation of Plan Bay Area 2040 has not been effective in preparing us to deal with today's overriding issue of job concentration in a geographically bounded area. In fact, it has completely missed the impacts of the exacerbated jobs/employed resident imbalances in the West Bay. Jobs are expanding there at almost twice the annual average projected in the Plan (and 35% less than projected in the major cities of San Jose and Oakland).

This has had serious consequences for the whole region. The methodology for Plan Bay Area 2050 must confront these imbalances and assure effective public discussion on planning for our future. MTC/ABAG missed the opportunity to confront the existing problems and offer pathways to resolving the most important issues by holding effective public forums.

We suggest three key methodological steps as critical for the planning process:

1. End the jobs-based model

MTC/ABAG base their population and housing projections for each community in the Bay Area on a model that starts with an aggressive regional job projection. The original job projections were based on maintaining the local share of a national BLS job projection by industry. The projections of jobs, population and housing for each community were then produced internally (based on their own consultants' work, their own Technical Advisory Committee and their own self-appointed advisory groups).

Once approved, the job growth starting point could not be lowered or even examined by subsequent CEQA processes. (Plan Bay Area 2040 is currently operating under a jobs growth number that was generated in 2011 and will continue in effect until 2022. During that time period, no lower regional job projection number could be considered (although a higher one can be).[11]

The model seriously under-estimated the high job growth numbers in one specific jobs-rich area—the West Bay. That has been a key cause of the problems discussed above. The process would be much improved by having a range of job growth options explored upfront both in the region as a whole and in key sub-regions, like the West Bay.

This would allow the modeling process to compare impacts of a range of jobs and population projections for the region as a whole, as well as key sub-regions. It would foster the exploration of the impact of alternative job growth projections on land costs, housing costs, congestion, income inequality, infrastructure needs and sustainability goals.

The initial methodology must allow communities to explore job growth and housing growth together upfront, including potential regional imbalances. This would allow public discussion of the consequences of a more moderate and balanced jobs and housing growth throughout the Bay Area and in special regions and the range of impacts on their communities.

2. Provide realistic options for balanced growth

MTC/ABAG has suggested a process that should be at the core of planning for Bay Area 2050. Horizon's Perspective Paper: The Future of Jobs (May 2019) identified a few Priority Strategies that would help. One was particularly suited to the problems of the West Bay. It was Priority Strategy L3: "Office Development Limits in Jobs-Rich Communities". This strategy stated that cities that have a job/housing ratio of over 2:1 merited special attention. [12]

But Table 4 pointed out that the entire West Bay was adding jobs at well over a 2:1 ratio over the period 2010-2018. Thus the entire West Bay qualifies as an area that is job rich, with a transit system that is at full capacity and difficult commutes over restricted bridges or crowded north-south roadways. Between 2010 and 2018 this area added over 250,00 jobs with half of them coming from outside the area using crowded commute corridors.

This has created the list of critical issues that affect the whole Bay Area. There is no easy transit solution available. Denser housing is limited because the land cost in the fastest growing job centers is so high that developers will not build housing in mixed zone areas unless they are granted mandates to build even more offices than housing units. (Note: a thousand square feet of office space can house between four to six workers while a similar space for housing would fit a single apartment with access and common spaces that would on average house fewer than 1.5 workers. The job space clearly offers a higher return.)

This means that this huge regional imbalance must be addressed in the updated Plan. A critical component of the Plan's methodology has to be to explore incentives that offer alternative growth paths in this major jobs-rich area. This should include exploring the consequences of moderate and balanced growth of both jobs and housing with a dynamic and adapting transit system that grapples with today's existing problems of imbalance and congestion.

Clearly, job limit discussions have to engage the whole of the jobs-rich area—in this case the West Bay.

There are really two critical tasks that should be included in the new methodology: working carefully to craft incentives for a balanced growth of jobs and housing in the West Bay while at the same time creating credible incentives for jobs to grow in San Jose, Oakland and the urban areas in other parts of Santa Clara, Alameda and Contra Costa Counties.

The incentives that MTC/ABAG uses to allocate job growth around the Bay Area (profitability in Priority Development Areas in jobs-rich areas with promised transit solutions) have not worked. We need to explore balanced job/housing growth in the West Bay and clear incentives to add jobs in cities like Oakland and San Jose and other mid-level cities on the East and South Side of the Bay.

3. Open the process to engage a diverse set of those affected

Job growth has an impact on each of the problem areas we discussed above. The only road to an effective planning process is to grapple with this complex set of interrelationships in the modeling process and that each of the key parties affected has a chance to observe and comment

on those relationships. Elsewhere MTC/ABAG has introduced the notion of an iterative model.[13]

An effective iterative model would look not just at the impacts of transit on housing but the impact of jobs on community life. By far, the biggest imbalance is on the jobs and employed resident side and any effective policy has to grapple with the consequences of shifting that jobs to housing ratio. But, of course, the way the model is currently set up, there can be no examination of alternative lower job growth numbers in specific regions during the course of the RHNA period.[14]

Obviously the most effective way of lowering housing prices in the jobs-rich West Bay would be to lower the job growth number which is pushing up land and housing costs and forcing longer distance commuting. A good effective reiterative model could explore how much housing prices and congestion might be affected if the jobs growth number was lowered in jobs-rich areas. Thus, a jobs cap or limit through the West Bay would be one effective way of dealing with the whole slew of problems that have cropped up over the last eight years.

The Regional Body involved (MTC/ABAG) has no direct authority over land use matters in the individual cities. But they do have substantial incentives that they could use to shift the site of new growth. They could provide affordable housing funds for those communities that fostered balanced jobs and housing growth. They could build transit systems that would provide effective service linking homes and jobs outside the West Bay. By limiting the growing number of long-distance commuters, they would be providing the most effective way of cutting harmful emissions and wasted time in congestion.

The approved methodology needs to explicitly examine the consequences of critical decisions on job growth for each of the ten challenges mentioned above. Participation in the process should include all parties affected. Make this happen—get a Bay Area Plan that allows an effective reiterative planning process with diverse public inputs.

Based on this data, MTC/ABAG must acknowledge that the methodology and processes of Plan Bay Area 2040 are seriously flawed. We believe that if MTC/ABAG continues to use these flawed methodology and processes, Plan Bay Area 2050 will encourage aggressive job growth in jobs-rich areas such as the West Bay that will only serve to aggravate the existing problems and fail to present serious alternatives for focused job growth that offer a more balanced and sustained outcome.

We look forward to your prompt written response to our concerns, the data we have presented and realistic alternatives for future balanced jobs-housing growth dicussions in the West Bay.

Sincerely,

Greg Schmid
Freddie ParkWheeler

For the West Bay Citizens Coalition

cc:

California State Assembly

California State Senate

California Governor

[1] ABAG Resolution 02-19.

[2] Morris A. Davis and Michael G. Palumbo, Federal Reserve Board, Staff Paper 2006-25, Washington DC).

[3] Berube, Alan, "Income Inequality in cities and metro areas: An update" Brookings: Metropolitan Policy Program, 2016, Appendix X).

[4] Glassman, Brian, U.S. census Bureau, "Income inequality among Regions and Metropolitan Statistical Areas: 2005 to 2015", SEHSD Working Paper Number: 2017-41).

[5] *Horizons, Vital Signs* "Bay Area: Time spent in Congestion")

[6] BART, Caltrain and VTA operating statistics.

[7] Data taken from California Department of Education, School Profiles, and California Department of Finance, E-5. Population Estimates for Cities and Counties, 2011-2019.

[8] Santa Clara County, County Assessors 2018-2019 Annual Report, page 14.

[9] MTC, Plan Bay Area 2040, Draft EIR, April 17, 2017, p 1.2-13.

[10] Annalee Saxenian, "Regional Advantage: Culture and Competition in Silicon Valley and Route 128", Harvard University Press, 1994 and Martin Kenney, ed. "Understanding Silicon Valley: The Anatomy of an Entrepreneurial Region", Stanford University Press, 2000).

[11] MTC, Plan Bay Area 2040, Final EIR, July 10, 2017, Master Response #6, p 2-16.

[12] MTC, Regional Advisory Working Group, June 4, 2019, Agenda Item 3, Attachment B, page 2 of 17.

[13] MTC, Regional Advisory Working Group, June 2, 2019, Agenda Item 2, Draft Methodology, page 2-4 of 13.

[14] MTC, Plan Bay Area 2040, Final EIR, July 10, 2017, Master Response #6, p 2-16.