



City of Alameda • California

September 28, 2016

Mr. Steve Heminger,
MTC Executive Director

Subject: City of Alameda Comments on Preferred Scenario/Plan Bay Area 2040

Dear Mr. Heminger and Mr. Rapport:

The City of Alameda City Council, Planning Board, and its citizens have been consistent supporters of the region's efforts to create a sustainable Bay Area. Alameda has worked hard to support the region's housing goals as articulated in the current Plan Bay Area. Alameda established two Priority Development Areas (PDAs) and identified significant acreage in the PDAs to accommodate the Regional Housing Needs Allocation (RHNA) and Plan Bay Area growth in its certified General Plan Housing Element.

The City of Alameda is a strong believer in two fundamental planning principles that have been the foundation of the region's past planning efforts:

- A successful regional plan for a sustainable Bay Area must be based upon strong links between land use and transportation, and
- A successful regional plan must be based upon the fact that each city has areas that can reasonably be expected to accommodate new growth (PDAs) and each city has existing neighborhoods that cannot be realistically expected to accommodate significant new growth.

A regional plan that ignores either of these two principles is a regional plan that will fail. The Preferred Development Scenario appears to fail on both principles when projecting new housing growth in the City of Alameda.

The Preferred Scenario Ignores the Land Use and Transportation Relationships in Alameda. Alameda has no BART stations and has no direct access to Interstate 880. Nevertheless, the preferred Scenario projects a 38% growth in households in Alameda over the next 24 years. In contrast, Berkeley has three BART Station and three direct points of access to Interstate 880, and the Preferred Scenario projects only a 20% increase in households. San Leandro has two BART Stations and three direct access points to Interstate 880 and the Preferred Scenario projects a 25% increase in households. Hayward has one BART station and three I-880 interchanges and only an 18% increase in households. Lastly, Fremont has one BART station and several access points to I-880 and the preferred Scenario projects a 28% increase in households.

The Preferred Scenario Ignores Alameda's PDA Designations: The City of Alameda has designated two PDAs to accommodate regional housing growth. These areas and the housing opportunity sites within the PDAs are clearly identified in our General Plan. The City of Alameda has consistently informed ABAG and MTC over the last 10 years that Alameda's existing historic neighborhoods cannot be expected to accommodate significant new housing growth. Over the last ten years, the existing neighborhoods have added two to three units per year and they have lost one or two units per year for a net gain of about one unit per year.

The preferred scenario assumes about 250 units per year in existing neighborhoods outside of the PDAs. This assumption means the Preferred Scenario will fail in Alameda. The Preferred Scenario assumes that 64% of Alameda's household growth will occur in existing historic neighborhoods outside of the designated PDAs. In contrast, the Preferred Scenario assumes 29% of Berkeley's growth to occur in non-PDAs, only 10% of San Leandro's growth in non-PDAs, and only 0.4% of Fremont's growth to occur in existing Fremont neighborhoods.

Alameda Request. We respectfully request that you adjust the assumptions about growth in Alameda. Specifically, we request that you reduce the assumptions for household growth in existing neighborhoods outside the PDAs from 7,450 households to no more than about 300 households. The requested adjustment will adjust Alameda's overall growth forecast to approximate 15% overall growth which would better reflect Alameda's poor connections to the regional BART system and regional Interstate system.

Finally, the State and the region must take more aggressive steps towards directly linking growth to concrete commitments of transportation and affordable housing funding. As an island City with limited crossings on and off the island that are already at capacity, the hope that the State and region may possibly provide funding for major transportation improvements and affordable housing, if Alameda approves greater growth, is a leap of faith Alameda cannot be expected to make. To date, the City of Alameda, its residents, and the local development community have worked collaboratively to try to shoulder the burden: requiring all new development to pay for annual transit operations and major multi-modal transportation ferry and bus infrastructure and funding comprehensive long-term transit, transportation demand management, bicycle and pedestrian plans and improvements. The State and region have done very little when it comes to funding transportation and affordable housing to support PDA development and housing in Alameda. If the City is going to be expected to continue development in our PDAs, we need concrete financial support from ABAG, MTC and the State for needed transportation improvements and affordable housing.

Sincerely,

Andrew Thomas, MCP and AICP
Assistant Community Development Director