

DON HORSLEY

Board of Supervisors
County of San Mateo

February 29, 2012

Kenneth Kirkey, Director of Planning
Association of Bay Area Government (ABAG)
P.O. Box 2050
Oakland, CA 94604-2050

Re: San Mateo County's application to designate the unincorporated Midcoast a Priority Development Area

Dear Mr. Kirkey,

Recently, concerns have been raised about the San Mateo County Board of Supervisors' unanimous decision to submit an application seeking a Priority Development Area in a Rural Corridor (PDA) designation for the unincorporated Midcoast. Although I can appreciate these concerns, I continue to support the position that designating the Midcoast a PDA is essential for the future sustainability of this unique region.

There has been, and will continue to be, concerns over transportation and mobility on the Midcoast until the proper actions have taken place. With limited safe crossings on Highway 1 and a need for better roads and traffic mitigation, this designation will allow San Mateo County to pursue much needed funding to assist in creating more sustainable communities on the Midcoast. One important funding opportunity that the Midcoast would benefit from is the PDA Planning Program through One Bay Area's FOCUS program. In accordance with the Local Coastal Program resubmittal, San Mateo County has committed to conducting a Transportation Management Plan. This plan would address how to alleviate traffic and improve transit, trails, and residential transportation, all essential for a sustainable community. Without this designation, the county's ability to submit a competitive application and receive grant funding is diminished.

Another priority for the Midcoast is a community plan for Princeton by the Sea. This plan will utilize the unique characteristics of Princeton's zoned working waterfront to improve economic development, infrastructure, and capital improvements. A PDA designation would allow San Mateo County to submit a competitive application to secure needed funding to complete the planning portion of this project, the first step in creating a more sustainable community.

The concern that the Midcoast does not meet the PDA criteria has been noted. The FOCUS Application Guidelines state that the criteria to be designated a PDA is as follows: (a) the area is within an existing



County Government Center
400 County Center
Redwood City, CA 94063

*Direct (650) 363-4569
Coastside (650) 573-2222
Fax (650) 363-1856*

community, (b) the area is near existing or planned fixed transit (or is served by comparable bus services), and (c) the area is planned or is planning for more housing. The Midcoast does not meet the transit requirements laid out in requirement (b). However, we are currently assessing transit on the Midcoast in the hopes of working with SAMTRANS to improve Midcoast transit services. Regarding requirement (c), development on the Midcoast is limited by the Local Coastal Program and California Coastal Commission to infill in existing coastal communities.

Access to water connections and improvements to roadways also play an role in creating more sustainable communities. Currently, Montara Water and Sanitary District (MWSD), the water provider for a large portion of the Midcoast, is working with the California Coastal Commission to establish the terms of permitting future water connections within the Local Coastal Program. Once the moratorium is lifted, MWSD will be able to permit new water hook-ups to new developments. If granted the PDA designation, San Mateo County will be able to seek funding to begin improving roadways and traffic congestion. This continues to remain a priority for the county.

The effort to designate the Midcoast a PDA derives from our desire to improve the region and make it more sustainable. It is our priority to improve roads, trails, transit, and the region as a whole. I urge you to approve the PDA designation for the San Mateo County Midcoast. Thank you for your time and consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Don Horsley", written over a horizontal line.

Don Horsley, Member

San Mateo County Board of Supervisors

Sabrina Brennan
165 La Grande Ave.
Moss Beach, CA 94038

February 14, 2012

Kenneth Kirkey, Director of Planning
Association of Bay Area Governments
PO Box 2050
Oakland, CA 94604-2050

Re: Application by San Mateo County for Priority Development Area (PDA) for the unincorporated Midcoast

Dear Mr. Kirkey,

For the reasons given below, I request that ABAG not approve the request to designate the semi-rural San Mateo County Midcoast as a PDA.

I appreciate regional development and conservation strategies that limit urban sprawl and promote urban open space, green street programs, farmers markets, wetland restoration, parks, community colleges, school bus service, food-hubs that provide professional food buyers with fresh produce grown by local farmers, and bicycle/pedestrian safety and mobility improvements near Bay Area transit and jobs.

I live in Moss Beach, one of five small unincorporated farming, fishing, and eco-tourism communities located along the semi-rural San Mateo County Midcoast. The unincorporated Midcoast communities of El Granada, Miramar, Princeton, Montara, and Moss Beach are not located near Bay Area transit or jobs. Infrastructure is extremely limited in all five communities — they lack sidewalks, street lights, curbs, and storm drainage. The lack of storm drainage in the unincorporated urban Midcoast results in significant flooding, runoff, and erosion during the rainy season. The Midcoast has woefully inadequate transit service and no school bus service. Chronic backups on 10 scenic miles of Highway 1, the only transportation corridor, bring traffic to a crawl on a daily basis. The Midcoast does not have a supermarket, library, or community center. The Midcoast lacks public and private school capacity. We do have one small hospital. Most voting age citizens commute daily over the Santa Cruz Mountains to jobs on the Bayside of San Francisco, San Mateo, and Santa Clara counties.

I am concerned about a number of issues that impact ABAG designation of the San Mateo County Midcoast as a Priority Development Area (PDA).

The Midcoast is located entirely within the Coastal Zone. I am concerned about the inherent policy conflicts between PDA designations, the California Coastal Act and San Mateo County Local Coastal Program (LCP) policies for the Midcoast. I have not been able to find any information on ABAG, FOCUS, and OneBayArea websites as to how Coastal Act and LCP policy conflicts would be resolved. If the ABAG Executive Board designates the unincorporated Midcoast as a PDA, the Midcoast could become a target for state mandated, higher density development than allowed by the LCP. Any proposed Coastside development could be subject

to appeal to the California Coastal Commission, which is likely to deny it.

A PDA designation is not appropriate for areas with significant constraints on new development. The Midcoast has inadequate infrastructure, including water, sewer, schools, and highway capacity, to accommodate planned buildout. All new development must be consistent with the County's LCP, which was certified in 1980. An update to the Midcoast LCP has been in limbo for more than a decade, and is still under review by the California Coastal Commission.

The low-lying portions of the Midcoast are located within a tsunami inundation zone, flood zone, and sea level rise zone. Specifically all of Princeton, areas along Airport Street including the proposed Big Wave project, and the Manufactured Home Park, nearly all of Miramar, and a small part of El Granada are within the mapped flood zone. Strategies for coping with coastal erosion, landslides, and sea level rise include Planned Retreat. Designating a PDA in a semi-rural unincorporated area that must plan for sea level rise impacts and is far from transit and jobs is not a sustainable growth strategy.

Designating PDAs in unincorporated areas located in the Coastal Zone that are far from transit/jobs would force counties plagued by budget problems and aggressive housing allocation numbers to change zoning regulations to maximize infill development. Rezoning the Coastal Zone for high density development in an area that is projected to experience sea level rise is not smart planning. PDAs are envisioned to "support focused growth by accommodating growth as mixed use, infill development near transit and job centers, with an emphasis on housing." That's an urban Bayside strategy, and has the potential to conflict with the Coastal Act and LCP.

The FOCUS Application Guidelines require that a PDA must meet all of the following criteria: (a) the area is within an existing community, (b) the area is near existing or planned fixed transit (or is served by comparable bus service), and (c) the area is planned or is planning for more housing.

The Midcoast area does not meet all of these criteria:

- 1) There is no plan for fixed transit and SAMTRANS bus service is marginal.
 - a. Route 17 (Montara to HMB) 90-min interval 8-6 daily (9-5 Sun); 60-min interval 6-8 AM weekdays.
 - b. Route 294 (Pacifica to San Mateo) 90-min interval 8-6 weekdays only.
- 2) The coastside has a significant surplus of housing compared to jobs, and residents must commute "over the hill" to jobs on the Bayside of San Mateo, Santa Clara, and San Francisco counties.
- 3) Housing is the lowest priority land use under the Coastal Act.

Another Midcoast issue which severely impacts PDA growth and development objectives is the inadequate water supply and delivery capacity. Coastside County Water District (CCWD) receives a limited supply of water from the Hetch Hetchy system, but by agreement with the City and County of San Francisco, cannot increase this supply. Montara Water and Sanitary District (MWSD) must rely entirely upon wells for its drinking water supply, which are even less robust than CCWD's.

An additional consideration is that while MWSD issues permits based on safe yield, meaning how much water they can reliably expect to get in drought years, CCWD issues permits based on

average yield (across wet and dry years). This means that half the time, CCWD is over-committed on the water supply, and every new connection increases the probability of mandatory rationing in dry years. Many homes in the unincorporated urban Midcoast are on private wells; salt water intrusion has been a problem in the past and is an on-going concern for some property owners. There are hundreds of people who paid in the 1980s to have the right to hook up. All they have to do is go to San Mateo County, pull a building permit and go to CCWD and say "hook me up" and CCWD has to do it. If/when CCWD actually hooks up all of the pre-sold water connections, there would be mandatory rationing about half the time. The bottom line is that if the Midcoast is currently at 50% buildout as the San Mateo County Planning Department states, there is simply no water available to get to full buildout, and especially not for increasing the amount of development.

The ABAG memo dated 8/30/11 finds that building homes in the right places — near jobs and transit options — reduces the need to drive for everyday needs, with the associated benefits of improved air quality and reduced greenhouse gas emissions. SB 375 requires the California Air Resources Board (CARB) to develop regional greenhouse gas emission reduction targets to be achieved from the automobile and light truck sectors for 2020 and 2035. San Mateo County has a jobs/housing imbalance, which leads to long commute distances from around the Bay Area to Bayside jobs. The county needs more housing near jobs and transit corridors to reduce vehicle miles traveled (VMT) and greenhouse gas emissions. The San Mateo County Coastside is one of the outlying areas providing housing for Bayside jobs, and thus has the opposite jobs/housing imbalance. There is no viable transit connection to Bayside jobs. Building more housing on the Coastside, far from the jobs center and transit corridor will not help reduce VMT and greenhouse gas emissions, but will actually contribute to the problem.

The Coastside's unique scenic and environmental resources are a treasure to be shared with all Californians. This area, without transit connections and isolated from the Bayside jobs centers, is best preserved as a small town farming, fishing, and visitor-serving destination, and the jobs it supports. Coastside VMT and greenhouse gas emissions can be reduced by improving local bus service and building the Hwy 1 multi-modal trail and safe highway crossings. Funding for these projects should come from Measure A. The new ABAG Priority Development Area guidelines ('Rural Mixed-Use Corridor' and the 'Rural Town Center') are too vague to ensure that grant funding incentives would go towards building pedestrian and bicycle friendly projects such as trails.

Over the past four years San Mateo County has missed two opportunities to apply for Measure A funding for Midcoast pedestrian and bicycle initiatives. This has been frustrating for residents who are concerned about the growing number of pedestrian and bicycle accidents and fatalities on Highway 1. The Route One pedestrian/bike trail from Montara through Half Moon Bay is specifically identified in the County Transportation Authority's Strategic Plan 2009-2013 as eligible for Pedestrian and Bicycle Funds from Measure A. Although Half Moon Bay has successfully applied for funds for a significant portion of the Trail within Half Moon Bay city limits, San Mateo County has not yet submitted an application for the unincorporated Midcoast segment, despite two calls for project submittals in the past four years.

The ABAG memo dated 8/30/11 states that Priority Development Areas are areas that are ripe for growth. "PDAs comprise a network of neighborhoods that are expected to accommodate the majority of the region's population and employment growth." Though ABAG and MTC can't

force cities to accept their projections, these agencies can withhold transportation grants from cities and counties that don't comply. Development of these areas would be bolstered by state grants, with 70% going to PDAs. ABAG & MTC propose regional funding program: OneBayArea Grant to support SCS (Sustainable Communities Strategy) implementation. \$211 million for Bay Area counties, based on population, Regional Housing Needs Allocation (RHNA), and actual housing production.

I'm concerned about the alarming lack of local participation in the County's recent decision to apply for a PDA designation in the unincorporated Midcoast. I did not receive adequate notification about the County PDA application. I was informed of this application only four days before the Board of Supervisors meeting of January 31, 2012, when the agenda was published online. I receive both the County list-serve notifications regarding permit and planning and Midcoast Community Council meeting agendas and I do not recall any public discussion or public notice regarding a proposed PDA in my community. I'm very concerned that this item was put on the Board of Supervisors consent calendar without first vetting it through the public.

I respectfully request that ABAG not approve the proposed PDA for the San Mateo County unincorporated Midcoast.

Sincerely,
Sabrina Brennan

cc: Bill Kehoe, Chair, Midcoast Community Council
Laura Stein, Vice-Chair, Midcoast Community Council
Lisa Ketcham, Secretary, Midcoast Community Council
San Mateo County Board of Supervisors
Steve Monowitz, Deputy Director, San Mateo County Planning Division
Ruby Pap, California Coastal Commission
Madeleine Cavalieri, California Coastal Commission
Dan Carl, California Coastal Commission



COUNTY OF SONOMA

PERMIT AND RESOURCE MANAGEMENT DEPARTMENT

2550 Ventura Avenue, Santa Rosa, CA 95403
(707) 565-1900 FAX (707) 565-1103

February 29, 2012

Ken Kirkey, ABAG Planning Director
Association of Bay Area Governments
PO Box 2500
Oakland, CA 94604-2050

Re: Sonoma County Application for Airport/Larkfield Priority Development Area (PDA) Designation

Dear Mr. Kirkey,

Thank you and your staff for assisting with our applications for PDA designations in Sonoma County. We have truly appreciated ABAG's efforts to develop alternative place types in the Sustainable Communities Strategy which are more appropriate for the Bay Area's rural counties such as Sonoma.

This letter is written to provide additional context and clarification of the County of Sonoma's application for Priority Development Area designation for the Airport/Larkfield area. We hope that this entire PDA boundary can gain staff's recommendation to the Executive Board on March 15, to support the County's efforts in reducing VMT in this area and support efforts for more sustainable future development.

The County has proposed a dual designation of Employment Center/Rural Town Center which appeared to be the best fit for this unique area split by Highway 101 with jobs to the west and housing with infill potential to the east. Preliminary feedback from ABAG staff indicates concern with meeting all of the criteria for the Employment Center half of this proposed PDA, so this letter will focus just on the portion of this PDA west of Highway 101.

Setting. The approximately 1,400 acre portion of the Airport/Larkfield PDA area west of Highway 101 contains a mixture of office, light industrial, warehouse, commercial and public facility uses. See attached Airport/Larkfield Area Overview and Land Use Graphics. This unincorporated area contained approximately 6,000 jobs in 2009. Development has been in accordance with the Airport Industrial Area Specific Plan, originally adopted in 1987. The Sonoma County Airport occupies about 780 acres, the majority of which is restricted for runway approach protection, leaving a balance of 630 acres of land for private development to the east of the Airport. Approximately one third of the 630 acres of industrial designated land is vacant.

The Sonoma County Airport is the North Bay's only airport providing passenger service and is an important transportation component supporting the local economy. In January, the Board of Supervisors approved a new Airport Master Plan and a package of improvement projects including runway extensions. The Airport Master Plan and Airport Improvement project were heavily supported by the business community, including a petition of support from over 500 local businesses representing essentially all of the major local employers and businesses in the County. The business community hailed the existing and expanded use of the Sonoma County Airport as a vital economic component to growing and attracting new businesses to Sonoma County. Another unique feature of this area is the Sonoma Marin Area Rail Transit (SMART) rail corridor running through the business park. The area is served by Sonoma County Transit with several stops throughout the park in the morning and evening commute hours at 30 – 40 minute headway intervals. The area has been developed with roadways to accommodate a Class II bike lane along the main roadway serving the area (Airport Boulevard).

Future Development Scenario. The area has a potential for another 12,000 jobs. Due to budget constraints, there are no immediate future plans to shorten the existing 30 – 40 minute bus transit headways during the commute hours. The site is well situated for the improvement of multi-modal transportation options for employees. The focus of SMART at this time is initiating service within two years between San Rafael and Santa Rosa, followed by extension to the Larkspur ferry and Cloverdale. Although a SMART station at the Airport Business Park is not currently part of the approved plan, we expect that passenger rail service for residents near any of the 14 rail stations along the 70 mile SMART corridor to the 6,000+ jobs within the Airport Industrial Area business park will become a high priority in the future, particularly as the economy recovers and additional jobs are created. As the attached Airport Business Park Distance/Direction Graphic shows, 61% of the 6,000 Airport Business Park workers reside only 10 miles away in the Windsor, Larkfield, and Santa Rosa communities. In conjunction with the improvement of the SMART rail corridor, there are plans to construct an adjacent Class I bike path which will provide a bike commuting option for Airport Business Park employees in the future.

Employment Center Criteria. The project meets all of the criteria for PDA designation except the 20 minute headway, as discussed below.

***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.*

1. *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.*

Response: This criterion is met. Buildout of the over 600 acres of private lands designated for industrial development in the General Plan at current allowed densities and at an FAR of 1.0 would result in over 18,000 jobs using a 50/50 mix of warehouse and industrial land uses and an average employee generation rate of 600 square feet of building area per employee. This calculation includes the existing 6,000 jobs added to development on 200 acres at the FAR and land use mix described above. This would result in nearly 30 jobs per gross acre in the Year 2040.

2. *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)*

Response: This criterion is not met. There are 2 or 3 bus stops in the morning and evening during commute hours 30 to 40 minutes apart. See attached Sonoma County Routes 60 and 62 route schedules. As mentioned previously, over 60% of the business park employees currently live within 10 miles of their job. There is great potential to encourage more transit, bike and future rail trips to reduce single occupant vehicular trips to the work area. A class II bike lane exists along Airport Boulevard, which would connect with a future planned class II bike lane

along Old Redwood Highway and a future class I bike lane along the SMART rail corridor right of way directly linking the Airport Business Center to the communities of Larkfield, Windsor and Santa Rosa. Additionally the potential exists for a rail stop to serve all the residents within walking distance of the 14 future rail stations to the north and south in the future. Obtaining planned Priority Development Area status for this entire Airport/Larkfield PDA would support Sonoma County's efforts to reduce VMT's at this location and create more sustainable development in the future.

3. *The areas are planned for a mix of uses, services, and amenities for employees.*

Response: This criterion is met. The Airport business park area has lodging, a health club, restaurants, service stations, and entertainment uses for employees and customers in accordance with development standards of the Airport Industrial Specific Plan.

4. *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.*

Response: This criterion is met. According to the jobs projections contained in ABAG's January 2012 Focused Growth scenario alternatives for 2040 the unincorporated County has a jobs/household ratio of 0.88 (57,233 jobs 2040/65,278 households), which is below the regional average of 1.25 jobs per household.

Thank you for your continued consideration of Sonoma County's application of the entire Airport/Larkfield proposed Priority Development Area. If I can provide any further information or clarification, please do not hesitate to contact me at 707-565-1925 or Denise Peter at 565-7385.

Sincerely,



Rete Parkinson, AICP
Director, Permit and Resource Management Department

Attachments:

1. Airport/Larkfield Area Overview Map
2. Airport/Larkfield Land Use Map
3. Airport Business Park Distance/Direction Graphic, US Census LEHD 2009
4. Sonoma County Transit Schedules Routes 60, 62

cc: Board of Supervisors
Denise Peter, Planner III
Jennifer Barrett, Deputy Director, Planning



February 27, 2012

Kenneth Kirkey, Planning Director
Association of Bay Area Governments
101 Eighth Street
Oakland, CA 94607

Dear Mr. Kirkey:

We are writing in regard to the joint application submitted by the City of Santa Rosa and Sonoma County for designation of a Priority Development Area (PDA) in the Roseland area under the FOCUS initiative. We understand that PDA designation has been postponed because transit service within the Roseland area does not meet the FOCUS criterion for 20 minute weekday peak commute headways at the present time. We respectfully ask that ABAG reconsider this decision, based on our view that the 20 minute headway criterion is not the best measure of transit density or transit orientation in the Santa Rosa CityBus system, and in the Roseland community in particular.

We are providing this letter in order to give a fuller picture of the current level of transit investment in the proposed Roseland PDA, to highlight important service design goals and constraints that limit the utility of the 20 minute headway criterion as a measure of overall transit density in the Roseland area, as well as to note what we view as a unique “chicken or egg” dilemma in relation to PDA designation for Roseland.

Transit Service Levels in the Proposed Roseland Area PDA

The proposed Roseland Area PDA encompasses the community of Roseland, an economically-disadvantaged area with high levels of transit ridership. The proposed PDA is centered on the Santa Rosa CityBus Southside Transfer Center. Every weekday, 112 CityBus trips—8 buses each hour—serve the Roseland area via four routes that provide direct service to downtown Santa Rosa as well as across Highway 101 and Highway 12 to key employment, social services, and shopping destinations on the north and east sides of Santa Rosa. These routes account for 30% of total service hours in the CityBus system. Three CityBus routes directly serve the Southside Transfer Center, pulsing at the Transfer Center every 30 minutes. This equates to six buses serving the Transfer Center each hour—one bus every 10 minutes if these trips were

distributed throughout the hour rather than being scheduled on a pulse model to facilitate transfers—an important feature of the CityBus service model. From the Southside Transfer Center, passengers can reach the downtown Transit Mall (the central hub of the CityBus system) four times each hour (on the :00, :10, :30, and :50), or travel directly across town to the Northside Transfer Center at the Coddington Mall—the second busiest transfer center in the CityBus system, after the Transit Mall.

Given the relatively low level of street connectivity in the Roseland area, providing adequate levels of service coverage is a key challenge and major area of investment in the CityBus system. Despite the lack of connectivity in some areas, many residents of the proposed PDA (such as those living near the Southside Transfer Center, Stony Point Road, Hearn Avenue, and West Avenue) have access to more than one CityBus route within a short walking distance. This reflects a decision made by the Santa Rosa City Council to ensure the widest access to transit within an area where a great many residents use transit as their primary mode of transportation. The City provides this coverage at the expense of frequency of service (due to the limits on available operating funds), but strives to mitigate the effects of lower frequencies by providing excellent connectivity via direct service to other parts of the City, as well as regular timed transfer opportunities.

We believe these other dimensions of transit service level should be considered in the case of the Roseland PDA. We additionally argue that the 20 minute headway criterion fails to take into consideration the central quandary of transit service provision in the Roseland area, which we believe makes this case unique, as discussed below.

“Which comes first?”

Roseland is a highly transit-oriented community, and in our view has demonstrated mobility needs and transit ridership levels that mark the area as a potential focal point for future transit operations investments, such as increased frequencies and longer span of service. (Indeed, the Roseland service model is one focus of the City of Santa Rosa’s current Short Range Transit Plan development process, in which a key proposal under consideration is introducing 15 minute headways on Roseland’s Route 9, which carries an average of over 40 passengers per hour.)

However, for CityBus to sustain the higher levels of transit service that we believe Roseland deserves, we must pursue all available measures to support three key outcomes for the area: 1) continued development, 2) increasing density in the urban fabric, and 3) vastly improved pedestrian infrastructure and connectivity to promote safe and convenient access to transit stops. We view designation of a PDA as a critical step in the process of supporting local planning, development, and infrastructure improvement projects that will enhance the already

notable transit orientation of the Roseland area. The quandary is this: which comes first—the investments that will qualify this area for PDA designation, or the PDA designation that supports these investments in the short term, and helps us to sustain them over the long-term? Santa Rosa's transit system may not have 20 minute headways in place at the present time, but PDA designation can only help us to achieve, maintain, and build upon these higher service levels to improve quality of life and economic opportunity for Roseland residents, and support the development of the Roseland area as an example of smart growth in the Bay Area.

We hope that this information will provide ABAG with a fuller understanding of the unique conditions in the Roseland area, and our rationale for considering this area to be an excellent candidate for PDA designation in keeping with the goals of the FOCUS program, and the City of Santa Rosa and Sonoma County's shared vision.

Please do not hesitate to contact Rachel Ede, Transit Planner, at 707-543-3337 or Lisa Kranz, Supervising Planner, at 707-543-3259, with any questions or needs for clarification. Thank you for your consideration.

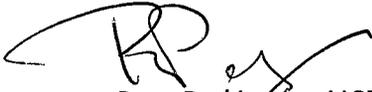
Sincerely,



Richard A. Moshier
Director of Transportation and Public Works, City of Santa Rosa



Charles J. Regalia
Director of Community Development, City of Santa Rosa



Pete Parkinson, AICP
Director, Sonoma County Permit & Resource Management Department

Cc: Kathleen Millison, City Manager, City of Santa Rosa
Santa Rosa City Council
Sonoma County Board of Supervisors
Jackie Reinhart, Regional Planner, ABAG

MAYOR JACK BATCHELOR, JR.
VICE MAYOR MICHAEL CEREMELLO, JR.
COUNCILMEMBER DANE BESNEATTE



COUNCILMEMBER THOM BOGUE
COUNCILMEMBER RICK FULLER
CITY TREASURER JAMES SLAUGHTER

March 5, 2012

Mr. Kenneth Kirkey
Association of Bay Area Governments
Regional Planning Committee
101 Eighth Street
Oakland, CA 94607

Re: Response to letters in opposition to designating Old Town Dixon as a PDA

Mr. Kirkey:

Recently you have received two letters, one from the Solano County Taxpayers Association and the other from the Old Town Neighbors, in opposition to the City of Dixon's application to have Old Town designated as a PDA. I wish to respond to some of the items mentioned in these letters which are inaccurate and do not represent the majority opinion of the City Council.

In the letter from the SCTA they mention that the City may need to sell the train station, because it is an asset of the now disbanded redevelopment agency. They reference a comment made by our City Attorney stating this certainty. The train station is owned by the City and not the redevelopment agency. Some redevelopment funds were used in the construction of the station, but there is no requirement they be repaid. Most of the funding for the station came from a Solano Transportation Authority (STA) grant. The comment made by our City Attorney was in response to a general question about what was going to happen to redevelopment assets. The council member asking the question wrongly assumed that the redevelopment agency owned the train station, because some redevelopment funds were used in its construction.

STA and the City are well aware that it will be expensive to ultimately make the train station meet the standards needed for a Capitol Corridor Train stop. Part of the reason for why we applied for a PDA designation of Old Town was to help further that objective by giving us a greater opportunity to apply for the needed funds to complete this work. It is true there are some people opposed to the train station ever being a stop, but they are in the minority. It has been a goal of this and many previous Dixon City Councils

City of Dixon

600 East A Street • Dixon, California • 95620-3697
(707) 678-7000 • FAX (707) 678-0960 • TTY (707) 678-1489

since 1996, when the City commissioned the Downtown Revitalization Plan, to once again have a train stop in Old Town. Completion of the Transit Center (train station) was also in the 2001-2006 Redevelopment Agency Implementation Plan.

In the letter from the Old Town Dixon Neighbors they mention their neighborhood should have been notified by senior staff of the PDA application, because of the potential adverse impacts the designation will have on the neighborhood. They mention a number of traffic concerns they believe will be exacerbated by higher densities that would be allowed in Old Town as a result of receiving a PDA designation. The City was under no legal obligation to notify Old Town Neighbors of the PDA application. The City has notified the neighborhood whenever a new development project has been proposed, as a courtesy. Obtaining a PDA designation in of itself is not approval of any development. Furthermore, their concerns about traffic as a result of increasing densities within the PDA is premature in that it is not certain what effects a project will have on existing traffic until the specific project is analyzed.

The City strongly believes the Old Town Neighborhood should be designated as a PDA. We believe having the train stop in Old Town is a key component to its revitalization and without the PDA designation it will be very difficult to obtain the necessary funding. We acknowledge there are a number of hurdles that must be overcome to achieve this goal.

Please feel free to contact me at 707 678-7004 x114 if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "David Dowswell". The signature is fluid and cursive, with the first name "David" being larger and more prominent than the last name "Dowswell".

David Dowswell
Community Development Director

cc: Jack Batchelor, Mayor
Jon Cox, Acting City Manager



Solano County Taxpayers Association
Earl Heal, President
P.O Box 31
Dixon, CA 95620
<solanotaxpayers@sbcglobal.net>

February 29, 2012

Association of Bay Area Governments
Regional Planning Committee
101 Eighth Street
Oakland, California 94607

Attention: Kenneth Kirkey, Planning Director

Subject: Dixon Application for Priority Development Area (PDA) Adopted by Council January 24, 2012

At its February 22, 2012, meeting, Solano County Taxpayers Association (SCTA) approved a resolution to present SCTA concerns to Association of Bay Area Governments (ABAG) about the large commitments of tax money, both past and future, required to bring a Capital Corridor train stop to Dixon. In addition we believe that the Dixon City Council January 24, 2012, staff report and resolution to approve the pending Dixon Priority Development Area (PDA) application failed to include recent, relevant information to the Council and to the public regarding future ownership of the train station. The train station was completed in 2007 using State redevelopment money and is central to the intent of the PDA.

The State dissolution of redevelopment agencies late last year did more than just stop the flow of money from Sacramento; it also allows the State to appropriate redevelopment assets (buildings, parking lots and leases). As the city attorney informed the Council on February 14, 2012, ". . . the City's obligation is to sell (the train station)." Although SCTA would argue that the City knew or should have known of the potential sale of the train station at the time the PDA application was approved by the Council in January, it is but one additional reason that the Dixon PDA application is premature and should not be approved at this time.

Contrary to the Council's official position, the actions of the Council in these matters have been neither unanimous nor without significant public disagreement since before the construction of the train station. The unfortunate location chosen for the train station will force the City to make a number of very costly and disruptive changes to the historic section of downtown (Old Town). The most costly and disruptive of these is the West A Street grade separation tunnel that is required to provide space to construct some future rail passenger platform. The City's application for the PDA acknowledges that a funding source for this project has not been identified. This project is expected to cost several tens of millions of tax dollars.

In addition to the high cost, the construction of a grade separation tunnel of a major cross-town street, West A Street, the only east-west crossing now in the city limits, would disrupt traffic and Old Town businesses for a very long time. Many businesses in Old Town are already struggling economically and the effect of this kind of disruption on these businesses is not expected to be positive. The existing post office seems sure to suffer major, if not permanent, disruption of public access.

What will be the effect of **selling** the train station? Shouldn't the PDA application at least be tabled until this question is resolved?

The PDA application also states ". . . the City **hopes** that many of the existing buildings in Old Town . . . will be renovated and reused. The City **hopes** that the upper floors . . . will again be used for residential." The SCTA is concerned that many historic buildings in Old Town were constructed before modern earthquake and other building standards were in effect and that "renovation" may be extremely costly. Instead of renovating the former Veterans Hall in Old Town, for example, the County recently elected to purchase a new facility in another location at a lower cost. The "hopes" of the City in the PDA application may prove illusory and may become the taxpayer's most costly approach to the stated goals of the PDA.

Again, what will be the effect on the proposed PDA of **selling** the train station?

Another smaller, but costly related project for which money has been approved by the Council is the construction of a pedestrian tunnel to replace the West B Street pedestrian grade crossing near the train station. In addition to the high cost (over \$6 million), SCTA is concerned about this project because the City's portion of money required for its construction has been diverted from a development impact fund (intended to mitigate growth related issues) to a transit capital fund that contained less than half the money required for the City's portion of this project. In addition to not clearly identifying the method of repayment of the money loaned (diverted) from the development impact fund, the Council majority focused mostly on a purported pedestrian safety issue at the site. A significant number of citizens and a minority of the Council have suggested a lower-cost alternative to address the supposed safety issue (the addition of crossing arms) and repeatedly questioned the cost, need and wisdom for this project at all. Opposition to this project includes significant safety issues (lack of visibility, potential for loitering and crime and the attendant risk particularly to students), aesthetics (odors, potentially poorly maintained lighting, dampness, vandalism) and taxpayer costs.

Citizens and some on the Council have repeatedly urged the Council to consider other, more suitable sites for a future train stop that would not be burdened by most of the mitigation measures, and costs, that the train station at its current location requires before any passenger train can stop. One of these proposed sites is within the city limits to the northeast of the subject location (East H Street) and has been offered by the owner for this purpose. This site is relatively free of development at this time and would offer a clean slate for future central transit development.

SCTA believes that ABAG and the Council should step back from their headlong rush to spend large amounts of tax money on a poorly-located train station and the pending approval of the PDA application until effects of the likely sale of the train station are made clear. SCTA also believes that alternative nearby passenger train sites exist that do not come burdened with the large costs and undesirable consequences for Old Town associated with the current location.

The Dixon Chapter of SCTA is currently circulating a petition stating the foregoing objections to further expenditures of tax money at the current train station site, and asking that the PDA application be halted at this time. Copies of these petitions will be available for review after March 14, 2012.

Sincerely,



Earl Heal, President
Solano County Taxpayers Association
(707) 446-1353



OLD TOWN DIXON NEIGHBORS

Dixon, California 95620

February 29, 2012

Mr. Kenneth Kirkey, Planning Director
Regional Planning Committee
Association of Bay Area Governments
P.O. Box 2050
Oakland, CA 94604-2050

Dear Mr. Kirkey:

We are writing as representatives of a group of Dixon residents known as the *Old Town Neighbors*. Our group opposes the application by the City of Dixon to designate our downtown, core neighborhood as part of a Priority Development Area (PDA) through the FOCUS program. We have summarized our objections for your review and consideration.

The community did not learn of the City's plan to apply for the PDA designation until well after the fact. Even though members of the *Old Town Neighbors* have been meeting with David Dowswell, Dixon's Community Development Director, since early 2009, we were never made aware of the City's intent to turn our downtown commercial district and the adjacent neighborhoods into a Rural Town Center/Rural Corridor. We only found out on January 24, 2012 when the Dixon City Council adopted a resolution, by a three-to-two vote, in support of an application that apparently had already been submitted. When we questioned Mr. Dowswell at our meeting with him on February 8, 2012, he indicated that at one of their weekly meetings, City staff had discussed whether to inform us ahead of time. According to him, senior staff did not "believe" they were obligated to let us know of the intent to designate our neighborhood as part of a PDA.

We would point out that in 2009 we submitted a neighborhood letter/petition to the local Planning Commission that was their incentive to direct Mr. Dowswell to begin meeting with us. In that letter we stated:

"Citizens should be actively involved in decision making that affects them and their families. Whenever a neighborhood policy, a zoning change, a strategic plan, or any other planning is undertaken, there must be continuous and maximum participation by those who will be affected by the change, especially by the residents who live in the area."

We have no doubt that you will agree that designating Old Town as a PDA has relevance to those residents who live within its boundaries.

Our City officials are well aware that the very neighborhood that they have chosen for a Priority Development Area has been over-developed for upwards of 30 years. In a report presented to the Planning Commission in September of 2011, Mr. Dowswell stated: "Staff acknowledges over the past 30 years the City has wrongly approved a number of projects in old town that violated the General Plan by exceeding their allowable density. The net effect is that many more units have been created in old town than should have been." Furthermore, in a July, 2009 response by City staff to a letter from the State Department of Transportation it was pointed out that "congestion and limited parking availability in the RM-2 are factors making it desirable to encourage multi-family housing in other neighborhoods."

Designating the Old Town area as a PDA will NOT help to implement the Downtown Revitalization Plan. Fostering home ownership in the adjacent neighborhood is a key element in the plan to revitalize the downtown. Mr. Dowswell is well aware from his meetings with the neighborhood at large, that many homeowners question the incentive to maintain property in an area that has for years suffered the impacts of overdevelopment. Adding more compact housing to the area will only exacerbate the unmitigated impacts that already exist.

In regard to the underutilized, existing buildings in the downtown commercial area, a determination should be made as to the cost of renovating and reusing the upper floors for residential use. Retrofitting brick buildings to make them safe for housing may very well be cost prohibitive for the property owners.

In terms of the goal to make Dixon a more pedestrian-friendly environment, many residents of our neighborhood and well beyond consider the undercrossing at B Street to be a giant step in the wrong direction. We do not believe that the passage will be safe for our children and seniors. In order to accommodate ADA requirements in terms of slope and platforms, access at either end of the tunnel does not provide for a clear line of sight. Residents are of the opinion that the undercrossing will discourage walking from one side of the tracks to the other, rather than promote it.

And, there is widespread concern that in regard to public safety and traffic mitigation, the overcrossing at Parkway Boulevard should be a higher priority. Depending on the time of day, traffic congestion through the bottleneck of downtown Dixon necessitates the fire department taking a very time consuming and convoluted route to respond to emergencies in the southeastern area of Dixon. Neither the pedestrian undercrossing at B Street nor the proposed vehicular undercrossing at West A Street will improve emergency response time to certain parts of town.

And, last but not least, the fate of the train station in downtown Dixon is uncertain.

At the Council meeting on February 14, 2012, there was discussion about the very real possibility that, as a redevelopment asset, the property may have to be sold. Many residents of Dixon and some members of the Council consider that to be a blessing in disguise. The current location has many more drawbacks than benefits; and, other options should be reexamined. One possibility is a site off of East H Street which at the present time and certainly in the long-term will be more accessible to the goods and services that our community has to offer.

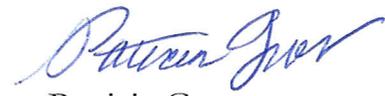
It has been many years since our now historic downtown has been the job center for our community. Development in the Northeast Quadrant is planned as the future center for employment opportunities not only for Dixon but for the surrounding area as well.

We trust that you agree with us that before an area is designated for Priority Development, more community input should take place. The public must be fully engaged in participatory planning in order to truly determine local aspirations for the development of a complete community.

As representatives of the *Old Town Neighbors*, we fully support the efforts of the local chapter of the Solano County Taxpayers Association to circulate a petition in order to gauge community sentiment about the proposed location of Old Town Dixon as a Priority Development Area.

It is our understanding that you will include our letter with the report you present to the Regional Planning Committee on March 12, 2012 and to the ABAG Executive Board for their meeting on March 15, 2012. Thank you.


Ginger Emerson


Patricia Graves


Martha Pearson


Sandy Block


David Werrin


Susan Werrin



**MILLER STARR
REGALIA**

1331 N. California Blvd.
Fifth Floor
Walnut Creek, CA 94596

T 925 935 9400
F 925 933 4126
www.mslegal.com

George B. Speir
george.speir@msrlegal.com

February 16, 2012

Association of Bay Area Governments
Executive Board
101 Eight Street
Oakland, CA 94607-4756
Attn: Ezra Rapport, Executive Director

RECEIVED

FEB 17 2012

EXECUTIVE DIRECTOR'S OFFICE

RE: City of Benicia Application for Priority Development Area (PDA) Designation
Industrial Park Area, Benicia

Members of the Board:

I am writing to you on behalf of West Coast Home Builders, Inc. (WCHB) with respect to the approximate 500 acres owned by WCHB, and commonly known as the Benicia Business Park. West Coast Home Builders recently discovered the December 16, 2011 application submitted to the Association of Bay Area Governments by the City of Benicia to establish the so called Northern Gateway – Benicia Industrial Park Priority Development Area under the FOCUS program (the "Application"). We understand applications are being reviewed at this time and that ABAG plans to select and adopt proposed PDA's on March 15, 2012.

WCHB was shocked to see its property included in this PDA application. No one from the City of Benicia contacted WCHB about this application even though the WCHB property supposedly represents over 50% of the proposed project area (the application indicates the total area to be 925 acres). WCHB strongly opposes the establishment of any PDA which would include its Benicia Business Park property. WCHB will vigorously pursue and oppose with any available legal remedies the creation of this PDA, including opposing any grant funding for the imposition of a Specific or Area Plan, related environmental review, and conditions imposed on development in the area of the proposed PDA.

The Resolution in support of the Application, adopted by the City of Benicia on January 17, 2012, includes an Exhibit A depicting the boundary of the proposed PDA. That map clearly shows the WCHB property within the boundary of the proposed PDA. We have also discovered that the City's December 16, 2011 Application to ABAG also includes the WCHB property (Part 3 "Maps of PDA"). A copy of the map submitted by the City which depicts the proposed PDA is attached as Exhibit 1.

The City's Application contains substantial erroneous and misleading information. The Application should be disqualified from the selection process.

Examples of errors in the City's Application include:

PART 1 – Applicant Information & Area Details:

- **Item b: “Area Name and Location”**
The Application describes the PDA Boundary as “Northern Gateway – Benicia’s Industrial Park (At HWY 680 at Lake Herman Road in the north to East Channel Road/Bayshore Road in the south, and bounded by Southern Pacific Railroad to the east, and Lake Herman Rd to the west”. This narrative area description clearly does not include the WCHB property, yet the accompanying maps do include the WCHB property.
- **Item c: “Area Size”**
The Application claims an area of 925 Acres. WCHB obtained a boundary calculation by a registered civil engineer that shows that the area depicted in the PDA Application and City's Resolution is 1,447 Acres. Attached as Exhibit 2 is a copy of the City's map, with the area on the north side of the proposed PDA which is owned by WCHB highlighted in orange.
- **Item f: “Total Housing Units”**
The majority of the PDA area (the Benicia Industrial Park) is designated in the City's General Plan as General Industrial. That land use designation does not permit residential uses.
- **Item g: “Total Jobs”**
The total jobs predicted for the year 2040 within the PDA is 11,600. That is an increase of 5,100 jobs within the area of the proposed PDA (11,600 projected jobs less 6,500 existing jobs). This is preposterous and misleading. The existing Benicia Industrial Park, which is the vast majority of the area of the proposed PDA, is 98% developed. Even by adding a small amount of vacant land north of Lake Herman Road and west of Highway 680, it is not physically possible to add 5,100 new jobs within the 925 acre area described in item 1.b. and 1.c of the Application.

PART 2 – Additional Area Information:

As explained earlier, Exhibit A of the Council Resolution in support of the Application depicts the WCHB property within the PDA. (Exhibit 1, attached.)

Part 2, item b asks: "Have other plans been developed within the last 15 years that cover the priority area?"

The WCHB Benicia Business Park had several development applications to the City and several EIR's were prepared and processed through the City. The Application is erroneous and misleading regarding the property included and fails to describe the extensive planning which has been undertaken in the past 15 years.

PART 3 – Maps for PDA:

As discussed above, the map depicting the proposed PDA includes the WCHB property, while the description of the area in the text of the Application is inconsistent with the map.

PART 4 – Narrative:

The entirety of this Narrative is in contradiction with the Boundary of the proposed PDA. The existing Benicia Industrial Park is discussed at length. The narrative states that "the proposed PDA already has infrastructure in place". This statement is not true as to the WCHB property. There is no mention of the WCHB property at all (the Benicia Business Park). There is absolutely no explanation or justification regarding how this PDA program is going to generate 5,100 new jobs.

PART 5 – Potential Assistance Requested:

Part 5 seeks information that will aid in the development of "tools and incentives" for development of the PDA. The City requests assistance in funding a Precise or Specific Plan for the area, as well as funding for EIR to implement the area wide plan.

WCHB strenuously objects to the preparation and imposition of specific or precise plans for its property, or the creation of supporting environmental reports regarding development of its property. ABAG should not award State of California Grants to assist in creation of land use plans over the objection of property owners. Given the projected nine billion dollar state budget deficit, funding a plan that will be vigorously opposed by the effected property owner is unwise to say the least.

The City apparently does not want input from WCHB and has therefore decided to seek alternative funding to plan the WCHB property. Planning for a development that is not supported by the owner, contains unacceptable conditions and requirements, and is not economically viable, makes no sense. No developer will set out to build a project that does not make economic sense. Planning for a project

Association of Bay Governments Executive Board
February 16, 2012
Page 4

that will not be built serves no legitimate purpose and is a waste of government resources.

The Application is erroneous and inconsistent. It is a mish-mash of misinformation. Almost nothing in this Application is accurate or reliable. The Application should be disqualified from the selection process.

Very truly yours,

MILLER STARR REGALIA

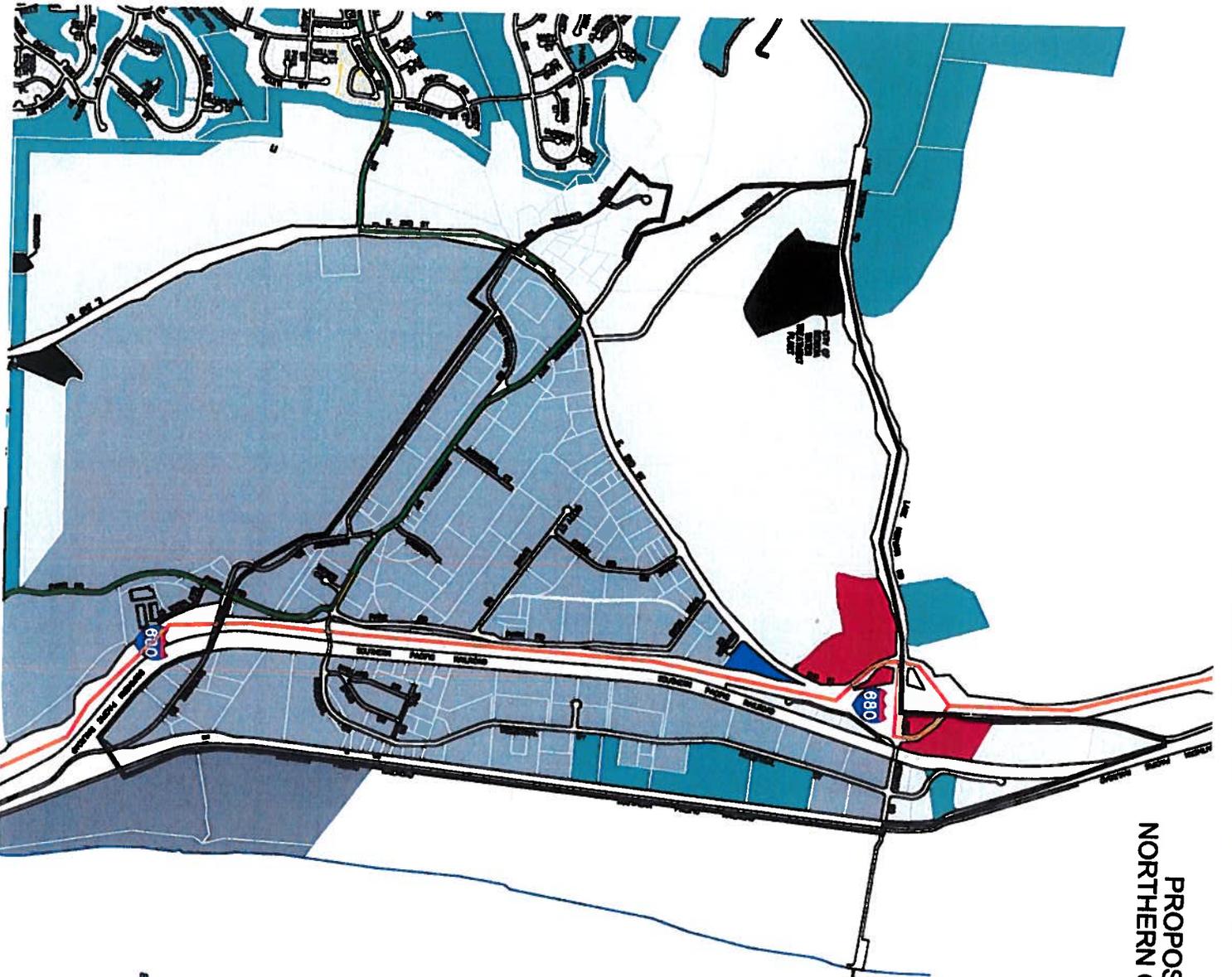


George B. Speir

GBS:mj
Enclosures

cc: Steve Heminger, Executive Director
Metropolitan Transportation Commission (w/encls.)

PROPOSED PRIORITY DEVELOPMENT AREA NORTHERN GATEWAY - BENICIAS INDUSTRIAL PARK



ZONING MAP LEGEND:

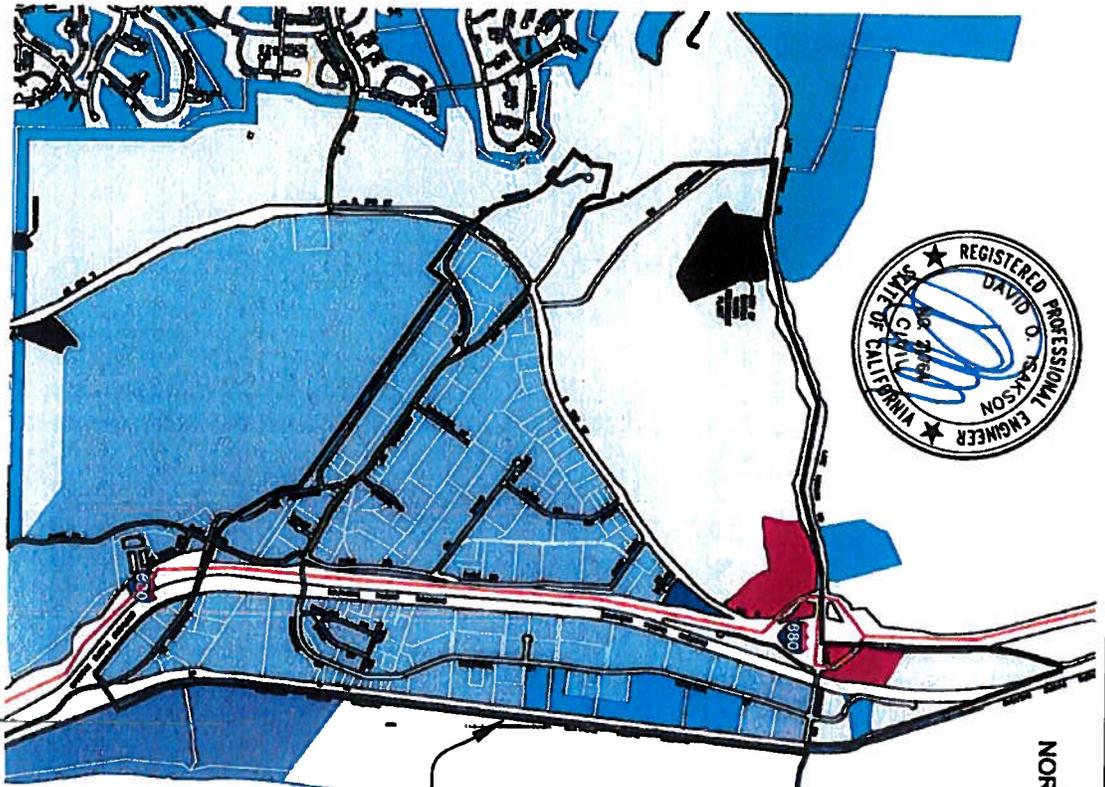
OS	OPEN SPACE
PS	PUBLIC & SEMI-PUBLIC
R3	SINGLE FAMILY RESIDENTIAL - 8 - 7 BUNGALOW
R4	MEDIUM DENSITY RESIDENTIAL - 8 - 6 BUNGALOW
R5	HIGH DENSITY RESIDENTIAL - 5 - 2 BUNGALOW
PD	PLANNED DEVELOPMENT
CC	COMMUNITY COMMERCIAL
CO	OFFICE COMMERCIAL
CG	GENERAL COMMERCIAL
CD	DOWNTOWN COMMERCIAL
CW	WATERFRONT COMMERCIAL
I1	LIMITED INDUSTRIAL
IG	GENERAL INDUSTRIAL
IW	WATER RELATED INDUSTRIAL
IP	INDUSTRIAL PARK

GENERAL LEGEND:

—	PROPOSED BOUNDARY
—	LOT / PROPERTY LINE
—	STREET / ROAD / HIGHWAY RIGHT-OF-WAY LINE
—	SHORE LINE / EDGE OF WATER BODY
—	NORTH-SOUTH BAY AREA (ROUTE 22)
—	EAST-WEST BAY AREA (ROUTE 49)



**PROPOSED PRIORITY DEVELOPMENT AREA
NORTHERN GATEWAY - BENICIA'S INDUSTRIAL PARK**



**PDA AREA =
1,447±
ACRES**



Graphic Scale in Feet

- ZONING MAP LEGEND:**
- OS OTHER OFFICE
 - PS PLAZA & SPECIAL USE
 - RS SINGLE FAMILY RESIDENTIAL - 1/2 ACRE
 - RM MEDIUM DENSITY RESIDENTIAL - 1/4 ACRE
 - RH HIGH DENSITY RESIDENTIAL - 1/8 ACRE
 - PD PLANNED DEVELOPMENT
 - CC COMMUNITY COMPLEX
 - CO GENERAL COMMERCIAL
 - CD DOWNTOWN COMMERCIAL
 - CV INTERMEDIATE COMMERCIAL
 - LI LIMITED INDUSTRIAL
 - IG GENERAL INDUSTRIAL
 - IR WATER RELATED INDUSTRIAL
 - IS INDUSTRIAL PARK

- GENERAL LEGEND:**
- PROPOSED DEVELOPMENT
 - EXISTING DEVELOPMENT
 - STREETS / HIGHWAY RIGHT-OF-WAY LINE
 - SHORELINE
 - WATER
 - RAILROADS
 - UTILITY LINES
 - ADDITIONAL TRAILER PARKING SPACES (PDA)



COMMITTEE FOR
GREEN FOOTHILLS

February 10, 2012

Ken Kirkey, Director of Planning
ABAG
P. O. Box 2050
Oakland, CA 94604-2050

Attn: Jackie Reinhart, Regional Planner

Re: Application by San Mateo County for Priority Development Area (PDA) status for the Midcoast urban area

Dear Mr. Kirkey,

Committee for Green Foothills (CGF) has been interested and deeply involved in land use and transportation planning in San Mateo and Santa Clara Counties for the past 49 years. CGF generally supports funding through FOCUS and One Bay Area Grants for Bay Area jurisdictions that are planning for more housing and jobs near transit, consistent with coordinated housing and transportation planning.

However, CGF questions the appropriateness of the proposed designation of the unincorporated Midcoast urban area as a PDA under the Rural Corridor place type. CGF's understanding is that PDAs are areas where there is a local commitment to developing housing along with amenities and services to meet the day-to-day needs of residents in a pedestrian friendly environment served by transit.

The Midcoast area consists of the five small unincorporated communities of Montara, Moss Beach, El Granada, Princeton, and Miramar, and is located entirely within the County's Coastal Zone. The area is comprised primarily of antiquated subdivisions created in the early 1900s, and has significant constraints to new development, including: steep/unstable slopes, geological hazards associated with the active Seal Cove Fault, cliff/bluff retreat along the coast, and low lying areas in Moss Beach, Princeton, Miramar and El Granada that are vulnerable to hazards associated with flooding, tsunamis, and sea level rise. There is inadequate infrastructure, including water, sewer, and highway capacity, to accommodate the planned buildout of the area. All new development must be consistent with the County's Local Coastal Program, (LCP), which was certified in 1980. An Update to the LCP for the Midcoast area has taken 11 years to develop, and is still under review by the California Coastal Commission.

The FOCUS Application Guidelines require that a PDA must meet all of the following criteria: *(a) the area is within an existing community, (b) the area is near existing or planned fixed transit (or is served by comparable bus service), and (c) the area is planned or is planning for more housing.*

The Midcoast area does not appear to meet all of these criteria. Specifically:

Criterion (b), which requires the area to be near existing or planned fixed transit (or served by comparable bus service), appears not to be met, as the Midcoast area has no fixed transit, and has only marginal SAMTRANS bus service. While the criteria for effective bus service for Rural Corridors is unstated, other PDA place types must have at least one route that has minimum 20-minute headways. The SAMTRANS routes serving the Midcoast fall short of this requirement:

- * Route 17 (Montara to HMB) 90-min interval 8-6 (9-5 Sun); 60-min interval 6- 8 AM weekdays
- * Route 294 (Pacifica to San Mateo) 90-min interval 8-6 weekdays only

It is notable that even this minimal SAMTRANS service has been difficult to maintain over the past several years due to revenues from ridership not justifying the costs.

Criterion (c), which requires that the area is planned or is planning for more housing, raises several issues as to potential conflicts with the certified County LCP. Housing is the lowest priority land use under the Coastal Act. The vast majority of new housing within the Midcoast area is planned as infill on scattered, already subdivided lots. The area has two designated affordable housing sites, which could accommodate up to 322 units of a combination of market and below market housing. These two sites have not been developed since certification of the LCP in 1980, for various reasons. It is unlikely that more housing can be accommodated beyond what is already planned, particularly since the coastside has a significant surplus of housing compared to jobs, and residents must commute “over the hill” to jobs in San Mateo, Santa Clara, and San Francisco counties.

CGF is particularly concerned about the lack of public participation in the County’s decision to apply for the PDA designation. CGF is on the County list for notification of permit and planning matters within the County’s Coastal Zone. Yet our organization was informed of this Application only four days before the Board of Supervisors meeting of January 31, 2012, when the Agenda was published. The County apparently did not anticipate any public interest, as the Board Resolution was on the Consent calendar. The Application states that the concept of a PDA designation was discussed in 2011 with the Midcoast Community Council, which is advisory to the Board of Supervisors. Yet none of the four members of the MCC who were on the Council during 2011 can recall being informed of the details and implications of the proposal, nor was there any community outreach at that time.

CGF notes that there are existing County funding sources to implement some of the Midcoast pedestrian and bicycle initiatives. For example, the Route One pedestrian/bike trail from Montara through Half Moon Bay is specifically identified in the County Transportation Authority’s Strategic Plan 2009-2013 as eligible for Pedestrian and Bicycle Funds from Measure A. Although Half Moon Bay has successfully applied for funds for a significant portion of the Trail within the City, San Mateo County has not yet submitted an application for the unincorporated section, despite two calls for project submittals in the past four years.

In conclusion, CGF feels that the proposed designation of the San Mateo County unincorporated Midcoast area as a PDA does not meet the criteria in the Application Guidelines, has not been fully vetted within the affected community, could potentially conflict with the certified LCP, and

therefore is not warranted for consideration at this time. Therefore we respectfully request that ABAG not approve the proposed PDA for the San Mateo County Midcoast.

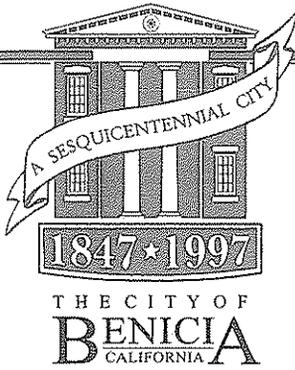
Thank you for consideration of our views.

Sincerely,

Handwritten signature of Lennie Roberts in cursive.

Lennie Roberts, San Mateo County Legislative Advocate

cc: San Mateo County Board of Supervisors
Steve Monowitz, Deputy Director, San Mateo County Planning Division
Ruby Pap, California Coastal Commission
Madeleine Cavalieri, California Coastal Commission
Dan Carl, California Coastal Commission
Midcoast Community Council
Cynthia D'Agosta, Executive Director, Committee for Green Foothills



March 7, 2012

ABAG Board and Regional Planning Commission
101 8th Street
Oakland, CA 94607

Re: Benicia Northern Gateway PDA – Response to WCHB Comment Letter

Dear Board and Commission Members:

The City of Benicia is very appreciative of all the work that ABAG and MTC have done to make the Priority Development Area effort so successful, including establishing employment centers as eligible for PDA status. Accordingly, we are hopeful that you will approve of our application for a Northern Gateway PDA.

I regret that we have not been more successful in communicating the City's intent in pursuing PDA status for our Northern Gateway area with the largest property owner in our industrial/business park area. Contrary to the February 17 letter submitted to the Board by legal representation for West Coast Home Builders (WCHB), the City's intent is not to try to plan any portion of the proposed PDA without the involvement of WCHB or any other property owner. If and when planning efforts occur, the City will strive to include all interested parties through extensive outreach and communication efforts.

Our clear intent for the PDA is to become eligible for future funding for planning and infrastructure to support businesses and job creation in the area, in large part via improved transportation systems, to shorten commute distances for the full income range of employees and thereby help reduce vehicle-related emissions.

We are appreciative that WCHB points out the embarrassing error in our acreage calculation (1,450 acres instead of 925) and gives us an opportunity to acknowledge that indeed it would be development of the "Benicia Business Park" parcel owned by WCHB that would account for the majority of new jobs within the PDA.

Although City staff worked closely with WCHB for several years on an application for a project on the site, that proposal ultimately was withdrawn by the applicant. Therefore, contrary to the assertion in the February 17 letter, there are no adopted plans for the PDA.

Finally in response to the WCHB letter, infrastructure is indeed in place within the PDA. The need for additional infrastructure to serve a future development on the WCHB parcel will depend on the development plan for the site and will be primarily the responsibility of the developer, as is the case Statewide.

We look forward to your consideration of the Benicia Northern Gateway PDA proposal, and to working with WCHB and all other stakeholders to improve the viability of our major employment center in the regional effort to reduce greenhouse gas emissions.

Sincerely,

A handwritten signature in black ink, appearing to read 'CK/K', is positioned above the typed name.

Charlie Knox
Public Works & Community Development Director

cc: City Manager and Council
George Speir, Miller Starr Regalia
Albert Seeno III, West Coast Home Builders
Steve Heminger, MTC



March 8, 2012

Sailaja Kurella, Regional Planner
Association of Bay Area Governments
101 Eighth Street
Oakland, CA 94607

SUBJECT: PDA Application – Downtown Danville

Dear Ms. Kurella

In the email you sent in early February you posed several questions. Your generalized questions are repeated below and along with our corresponding responses. Under separate cover we will pass on comments/questions about the determination by ABAG/MTC that the proposed Downtown Danville PDA application has been found to have an inadequate level of transit service to meet the criteria for a PDA (i.e., transit does not meet the target 20 minute headway during peak weekday commute periods). You will note that some of the comments included in this letter address the minimum headway issue.

Question Topic Area #1

The Town's PDA application notes that future residential densities in the area will include Residential - Multifamily - High/Medium Density (20-25 du/ac) and Residential - Multifamily - High Density (25-35 du/ac) zones (listed under Part 1i of the PDA application). However, the General Plan zoning map shows only Residential - Multifamily - Low Density (7-12 du/ac) and Residential - Multifamily - Medium Density (13-21 du/ac). Could you confirm whether the apparent discrepancy is a result of the fact that the General Plan map is from the 2010 General Plan and that the proposed 2030 General Plan will have the new designations listed in the PDA application? Could you provide a zoning map of the draft 2030 General Plan?

Response

The Land Use Map for the Danville 2010 General Plan (i.e., Figure 5 of the 2010 Plan) contained mapping errors as it did not reflect land use designation changes formalized with the August 1999 adoption of the 2010 Plan. Specifically, with the 1999 action, the Town split the previously existing Residential - Multiple Family - Medium Density (13-21 du/ac) land use designation into two designations, being a Residential - Multiple Family - Low/Medium Density (13-17 du/ac) designation and a Residential - Multiple Family - High/Medium Density (18-22 du/ac) designation. The changes were reflected within the body of the document (see Pages 44, 49 & 50 of the 2010 Plan).

Ms. Sailaja Kurella

March 8, 2012

Page 2

Through the process of securing State of California Housing and Community Development Department (HCD) approval of the Danville 2007-2014 Housing Element, the Town secured authorization to have the Regional Housing Needs Allocation (RHNA) shortfall identified in the Housing Element handled through the creation and application of a recalibrated Residential - Multiple Family - High/Medium Density (18-22 du/ac) designation and the creation of a new land use category covering a 25-35 units per acre density. The recalibrated land use designation [retitled to “Residential - Multifamily - High/Medium Density (20-25 du/ac)”] and the new land use designation [preliminarily identified as “Residential - Multifamily - High Density (25-35 du/ac)”] have been incorporated into the Draft Danville 2030 General Plan. The Draft 2030 Plan (along with the associated General Plan EIR) is slated to be released for public review in about two months.

Enclosed please find a table that expands upon the multifamily sites table previously forwarded to you as part of the Town’s PDA application. This table lists all multifamily sites within the Town (including proposed multifamily sites under review through General Plan update) and details both the current land use designations (under the 2010 Plan) and proposed land use designations (under consideration in the Draft 2030 Plan). Note that to recalibrate the Residential - Multiple Family - High/Medium Density (18-22 du/ac) designation contained in the 2010 Plan, it will be necessary to recalibrate the density ranges for all the remaining multifamily land use designations that were included in the 2010 Plan. A corresponding land use map has not been prepared to date. We will forward a copy of the draft land use map for the 2030 Plan once it has been prepared.

Note that the mandate for the RHNA shortfall acknowledged in the Danville 2007-2014 Housing Element is to identify and designate at least two additional acres to a minimum 20 units per acre land use designation (to be handled by the Residential - Multifamily - High/Medium Density (20-25 du/ac) designation) and to identify and designate a minimum of eight acres to a 25 units per acre land use designation (to be handled by the Residential - Multifamily - High Density (25-35 du/ac) designation). The Draft 2030 Plan and the associated EIR have been structured to allow the Town to consider the merits of changing roughly 2½ times the minimum acreage called for under the RHNA shortfall analysis. Many of those sites would be situated within the PDA area – with the change in land use designation at least peripherally linked to whether the PDA is approved by ABAG/MTC.

Question Topic Area #2

Is the transit service that is available to the BART stations during AM/PM commute times heavily utilized? Has there been any discussion during your planning processes for the area about increasing transit service, particularly during AM & PM peak commute times? As you note, the current bus service in the area do not quite meet our transit service requirements, but if the buses are heavily utilized by commuters or if service improvements have been recommended in the General Plan, we can make a strong case that this is a transit-oriented community.

Ms. Sailaja Kurella

March 8, 2012

Page 3

Response

The Town has not had an opportunity to check with The County Connection as to ridership since your inquiry nor have we had an opportunity to field check ridership.

It needs to be noted that a total of three different County Connection bus routes pass through the Danville Park and Ride site, which is located within the Downtown Danville PDA. This fact provides the desired transit connectivity as it allows transit riders multiple options to access BART-Walnut Creek, BART-Dublin and the Pleasanton ACE Train station – and the Downtown Danville PDA. A fourth County Connection route serves the PDA but does not stop at the Park and Ride (i.e., Route 321).

The bus routes with a scheduled stop at the Park and Ride site include Route 21 BART-Walnut Creek/San Ramon Transit Center; Route 92X Mitchell Drive Park and Ride to Ace Train Station; and Route 95X BART-Walnut Creek to San Ramon Transit Center. In combination, these routes provide an average headway for weekday peak AM/PM transit periods of 15 to 16 minutes (see enclosed table).

The combination of weekday routes for County Connection Routes 21 and 321 get the Danville Blvd./Hartz Ave./San Ramon Valley Blvd. corridor through the Downtown Danville PDA very close to the 20-minute headway target by and of themselves. As shown on the enclosed map, the Downtown Danville PDA contains nine northbound and nine southbound County Connection bus stops. Routes 21 and 321 make stops at all these bus stop locations.

The enclosed tables provide a representative look at the headways for the weekday peak AM/PM transit periods along the Danville Blvd./Hartz Ave./San Ramon Valley Blvd. corridor that transects the PDA. Per the information provided in the table, the corridor is served with a 22 minute average headway during weekday peak AM/PM transit periods just by Routes 21 and 321. This weekday peak AM/PM transit period headway calculation is likely different than the previously estimated headways as it accounts for a supplementary bus route (i.e., Route 321) not accounted for in the PDA application packet (or in the Draft Danville 2030 General Plan).

As discussed in the PDA application packet, the Danville Park and Ride - at 246 spaces and occupying over six-plus acres - represents a significant resource to the transit network. As indicated in the PDA application material, the presence of private-sector bus-pooling operating weekdays out of the Park and Ride supplements the County Connection bus service described above.

Supplementing bus service to the PDA is the presence of the Iron Horse Trail – which serves as the commute choice for numerous Danville residents and Danville employees. It can be reasonably argued that the presence of this transit facility equates to the transit value of one or two additional County Connection buses per each commute period. Specifically, since the

Iron Horse Trail reasonably sees use by some 20-40 daily commuters coming onto, or exiting off of, the trail facility for work-related trips – this facility has the equivalent value of another one or two County Connection buses traveling through the PDA.

The Draft Danville 2030 General Plan includes language underscoring the value of the Iron Horse Trail as a part of the overall transit network. The following is an excerpt from the Mobility Chapter of the Draft 2030 Plan:

“Bicycling is a healthy, environmentally sustainable mode of travel. While cycling has traditionally been regarded as a form of recreation in Danville, it can also be a viable means of traveling to school, shopping, work, and other destinations. Facilities such as the Iron Horse Trail are particularly important, as they connect Danville to two BART stations, major employment centers, and the surrounding region. The Iron Horse Trail also connects residential neighborhoods to one another, to Downtown, and to local schools and parks, and to cities along the I-680 corridor from Dublin to Concord.”

The Mobility Chapter of the Draft 2030 Plan also includes the following discussion about the Iron Horse Trail:

“The Iron Horse Trail Corridor, formerly the Southern Pacific Railroad, runs from Concord south through Pleasant Hill, Walnut Creek, Danville, San Ramon, Dublin, and Pleasanton. The Contra Costa County portion of the Trail is 18.5 miles long and varies in width from 30 to 100 feet. The right-of-way is occupied by various underground utilities and a 10-foot wide, paved multi-use trail that is managed by the East Bay Regional Park District. There are plans to extend the Trail north to Suisun Bay and east to Livermore, bringing the Trail’s total length to a distance of 40 miles.

The Iron Horse Trail is particularly important as an access route to Downtown Danville and makes cycling a viable alternative to driving Downtown for many residents. The Trail also attracts recreational bicyclists from across the region, helping to support Downtown businesses. A signalized mid-block crossing was installed in Downtown Danville in conjunction with development of the Iron Horse Plaza Shopping Center, providing safe at-grade access across San Ramon Valley Boulevard. At several other street trail crossings in Danville, the trail is equipped with lighted in-ground crosswalk sensors or flashing beacons. The trail continues to cross several major Danville thoroughfares at-grade, including Sycamore Valley Road and Crow Canyon Road, just east of I-680.”

As regards general discussion of public transit service in Danville (and consideration of supporting enhanced transit service specifically), the Mobility Section of the Draft 2030 Plan includes the following language:

“Public Transit Service in Danville

Local bus service is provided to Danville by Central Contra Costa Transit Authority (CCCTA), or “County Connection.” Service has been significantly reduced since 1999 in response to reduced State funding. The County Connection operates three types of bus service in Danville.

The primary service is a weekday route (Route 21) that connects the Walnut Creek BART station with the San Ramon Intermodal Transit Center in Bishop Ranch Business Park in half hour intervals from 7:20 A.M. to 11:20 P.M. The bus travels along Danville Boulevard, Hartz Avenue, and San Ramon Valley Boulevard, with a stop at the Danville Park and Ride lot on Sycamore Valley Road.

Second, CCTA provides two express bus routes. The first (Route 95X) provides service between the Walnut Creek BART station and the San Ramon Intermodal Transit Facility. This service runs only on weekdays, from approximately 6:30 A.M. to 9:00 A.M. and from 4:00 P.M. to 7:00 P.M. The second (Route 92X) provides service from Walnut Creek to the Altamont Commuter Express (A.C.E.) train station in Pleasanton. Both bus routes stop at the Danville Park and Ride several times a day.

The third type of service is a “school tripper” (Route 623) that runs on a limited service basis, providing service primarily to school children. It begins at Alamo Plaza on Danville Boulevard and winds its way eastward and southward to the City of San Ramon.

Public transit in Danville is supplemented by TRAFFIX, a local student transportation program. The goal of TRAFFIX is to reduce peak period congestion near school campuses. The program offers subsidized transportation for children in the most congested areas of the San Ramon Valley (see the Implementation section of this chapter for more information).

Several privately sponsored vanpools operate from areas in and around Danville, providing guaranteed seating and direct service on a monthly fee basis. Patrons are picked up at the Sycamore Valley/ I-680 park and ride lot (discussed below) or at other points near the I-680 freeway ramps and are taken to major work locations throughout the Bay Area in San Francisco and other cities. There may be opportunities to supplement these types of services in the future as the mobility needs of Danville residents and workers change and travel patterns evolve.”

Discussion continues later in the Mobility Chapter of the Draft 2030 Plan as follows:

“Transit Service in Danville/Transportation System Management

Danville will continue to pursue transit service improvements, with a focus on three primary user groups:

- Commuters, including residents commuting out of Danville to work and those commuting into Downtown Danville for work
- Persons without access to a motor vehicle, including students and lower income households
- Those with special transportation needs such as the elderly and disabled.”

Because funding for transit is very limited, it is important that solutions are practical and respond to the land uses and demographics of the community. County Connection service has decreased in recent years while the rate of auto ownership in Danville has increased. Reversing these trends will require creative approaches that redefine what we conventionally think of as “public transportation”.

New types of service should be explored to supplement the traditional fixed route services along Danville Boulevard/ Railroad/ San Ramon Valley Boulevard and I-680. These could include demand-responsive dial-a-ride services, car-sharing programs, and potentially a circulator bus that loops from the Sycamore Valley Park-and-Ride through Downtown Danville.”

Demographic projections suggest that a majority of Danville residents will commute to jobs in other cities in the future. Thus, increases in express bus service from Danville to the BART stations and nearby employment centers will be needed. As these services increase, the adequacy of the Sycamore Valley Park and Ride lot will need to be evaluated. The lot already is used as an informal pick up spot for corporate vans and shuttles, and could see higher demand and use in the future.”

The Park and Ride lot is also the point of arrival for persons taking express buses from the BART stations into Danville, either to go to work (in Downtown Danville) or to shop and patronize local businesses. Pedestrian connections from the Park and Ride to Downtown should be improved. As noted above, a circulator bus or van could provide a connection from the lot into Old Town Danville and other nearby destinations.”

Land use decisions will become a more important part of public transit strategies in the future. By focusing new development near the Town’s major north-south transit corridor, ridership levels may increase and transit may become more viable. Likewise, transit can become a more attractive option if bus waiting areas are well designed and located, and the buses themselves are comfortable and reliable. Bus service can also be improved if the number of transfers to reach destinations is reduced, and if service is coordinated with other modes of travel, such as BART.”

The availability of funding continues to be the most challenging issue facing transit operations. The Town of Danville will continue to advocate for the maintenance of existing transit services and stable sources of funding for future services. The Town should also ensure that any funds invested in transit are reinforced by land use decisions which make the most of these investments. The broadest range of options possible should be considered to provide the routing and service frequency needed to make transit a viable alternative to driving.”

Public transit services will continue to be supplemented by ridesharing and vanpooling programs, including those implemented through the County’s 511 program. These include employer programs for telecommuting and flexible work schedules, reduced transit fare programs, school ride matching programs, and incentives which create alternatives to solo occupancy driving.”

The corresponding general plan policies within the Mobility Section of the Draft 2030 Plan pertaining to supporting public transit service in Danville are as follows:

Multi-Modal Circulation Policy

- | | | |
|-------|--|--|
| 11.10 | Recognize the special needs of persons with mobility limitations, including youth, seniors, and persons with disabilities, in the planning and operation of Danville's transportation system and services. | <ul style="list-style-type: none">• Local Transit Plan• Intergovernmental Coordination• Traffic Safety Program |
|-------|--|--|

Transportation Choice Policies

- | | | |
|-------|--|---|
| 13.01 | Support an expanded bus transit system in Danville which is integrated with surrounding communities and coordinated through CCCTA (County Connection) and other transportation agencies in the Tri-Valley area. | <ul style="list-style-type: none">• Intergovernmental Coordination• Local Transit Plan• TRAFFIX |
| 13.02 | Encourage private and quasi-public transit services which complement the CCCTA public transit system, such as shuttle buses, circulators, deviated fixed route services, and corporate vanpools.

<i>Such services can effectively expand the reach and frequency of the transit system, making it more practical to travel without a private automobile. Some of these services operate on an on-demand basis and others may operate on a regular schedule.</i> | <ul style="list-style-type: none">• Local Transit Plan• Intergovernmental Coordination |
| 13.03 | Support the development of passenger amenities which facilitate transit use, such as information on scheduled arrival times and appropriately located bus stops. | <ul style="list-style-type: none">• Local Transit Plan• Street Beautification Guidelines• Downtown Master Plan/ Ordinance |
| 13.04 | Encourage ridesharing, car and vanpooling, infrastructure (such as the Sycamore Valley Road park and ride lot) and other alternative modes to the services which reduce the need to travel by single-occupant automobile. <i>(Editor's Note: incorporates former 15.04)</i> | <ul style="list-style-type: none">• Transportation Systems Management Measures• Intergovernmental Coordination• TRAFFIX |

- | | | |
|-------|--|--|
| 13.06 | Review all planned road improvement projects to ensure that the needs of pedestrians, bicyclists, and persons with special needs are considered. | <ul style="list-style-type: none">• Capital Improvement Program |
| 13.07 | Support educational programs which promote bicycle and pedestrian safety, and the health benefits of bicycling and walking. | <ul style="list-style-type: none">• Street Smarts• Safe Routes to School |
| 13.08 | Support the concepts of car-sharing and bike-sharing as an alternative to private car and bike ownership. | <ul style="list-style-type: none">• Development Review• Downtown Master Plan/ Ordinance |
| 13.09 | Improve access to Downtown Danville for transit-dependent workers, seniors, and persons traveling without an automobile. | <ul style="list-style-type: none">• Capital Improvement Program• Grant Funding• Local Transit Plan |

This could include additional pedestrian and bicycle crossings of San Ramon Creek, better connections between the Sycamore Valley Road park-and-ride lot and Downtown, and similar improvements. It could also include improved paratransit for seniors and others with mobility limitations who rely on downtown services and businesses.

Regional Leadership Policies

- | | | |
|-------|---|--|
| 16.09 | Support continued bus access from Danville to BART stations, Amtrak, Altamont Commuter Express, and other rail systems. | <ul style="list-style-type: none">• Intergovernmental Coordination |
|-------|---|--|

Question Topic Area #3

Could you please summarize the recommendations from the Downtown Parking Assessment Study? Were the topics of parking standard reductions, P/TDM strategies, etc. considered or recommended?

Response

The following narrative in the Mobility Section of the Draft 2030 Plan provides a summary of the Downtown Parking Management Plan (followed by pertinent draft policies):

“Downtown Parking Management Plan

In 2010, the Town approved a plan to improve parking for Downtown business patrons by redirecting employee parking to the perimeter of the Downtown area. The plan is part of a broader Economic Development Strategy to promote Downtown Danville’s businesses. The Plan adjusts hourly limits on parking and modifies the Employee Permit Parking Program to apply higher fees for parking in high-demand areas. The plan also addresses licensing of valet parking, parking enforcement, and other parking-related topics.”

Proposed Revisions or Actions

The Downtown Parking Management Strategy will should be periodically revised in response to future development approvals, transportation improvements, economic conditions, Downtown business needs, changes to the Downtown Business District Ordinance, and future parking supply and demand studies. In the event that Downtown is formally designated as a Priority Development Area (PDA), new approaches to parking management may be needed to reinforce the area’s role as a pedestrian district.”

Multi-Modal Circulation Policy

- | | | |
|-------|---|------------------------------------|
| 11.09 | Implement parking management strategies in Downtown Danville which meet the needs of local businesses, patrons, residents, and employees. | • Downtown Parking Management Plan |
|-------|---|------------------------------------|

Integrating Land Use and Circulation Policies

- | | | |
|-------|---|---|
| 14.07 | Support the use of parking lots which can be shared by multiple users, particularly for activities with different peak demand times.

<i>This could include shared parking lots for public uses, such as local schools and Town parks, as well as private uses such as Downtown offices (who use the spaces during the day) and restaurants (who use the spaces in the evening). It could also include the designation of additional commuter parking spaces or satellite parking spaces within parking lots that are underutilized during commute hours.</i> | •Downtown Parking Management Plan
• Development Review |
|-------|---|---|

Ms. Sailaja Kurella
March 8, 2012
Page 10

14.08

Allow reduced parking requirements for projects which are likely to have lower rates of vehicle use (such as senior housing) or which include shared parking facilities or other provisions which reduce off-street parking needs.

- Zoning Regulations
- Development Review

Question Topic Area #4

Are you anticipating that a specific plan will be developed for the area, or do you feel the 2030 General Plan, once adopted, will be sufficient?

Response

The Draft Danville 2030 General Plan strives to fully integrate the concepts of the PDA into Danville's future. We can provide you a link to the full document to allow you to better grasp the nature and scope of the PDA discussion. As indicated above, the Draft Danville 2030 General Plan and the associate General Plan EIR are anticipated to be circulated for public review in the next couple of months.

Questions you may have regarding this material may be directed to my attention at (925) 314-3305 at your convenience.

Sincerely,

Kevin J. Gailey, AICP
Chief of Planning

Date: February 29, 2012 4:57:09 PM PST

To: kennethk@abag.ca.gov

Cc: jackieR@abag.ca.gov

Subject: PDA designation for San Mateo County Midcoast "rural corridor"

Dear Mr. Kirkey:

San Mateo County has a jobs/housing imbalance, which leads to long commute distances from around the Bay Area to County Bayside jobs center. The County needs more housing near jobs and transit corridors to reduce vehicle miles traveled (VMT) and greenhouse gas emissions.

The San Mateo County Coastside is one of the outlying areas providing housing for Bayside jobs, and thus has the opposite jobs/housing imbalance. The only local transit is inadequate bus service. There is no transit connection to Bayside jobs. Building more housing on the Coastside, far from the jobs center and transit corridor will not help reduce VMT and greenhouse gas emissions.

The Coastside's unique scenic and environmental resources are a treasure to be shared with all Californians. This area, without transit connections and isolated from the Bayside jobs center, is best preserved as a small town farming, fishing, and visitor-serving destination, and the jobs that support that. How can this possibly be considered a Priority Development Area? The designation will conflict with the CA Coastal Act and the San Mateo County Local Coastal Program.

Local residents were not consulted about the County's plans to apply for PDA designation for the Midcoast. We learned about it only at the last minute when it appeared on the Board of Supervisors' consent agenda.

In the spirit of SB 375, Coastside VMT and greenhouse gas emissions can be reduced by improving local bus service and building the Hwy 1 multi-modal trail and safe highway crossings, not by making this a Priority Development Area.

Thank you for the opportunity to comment,

Lisa Ketcham

172 Culebra Ln.

Moss Beach, CA 94038

Date: Wed, Feb 29, 2012 at 4:21 PM

Subject: Comment on Application for PDA Status for the San Mateo County Midcoast Urban Area

To: kennethk@abag.ca.gov

Dear Mr. Kirkey: As a 41 year resident of the San Mateo County Midcoast area, I have many concerns about the County's recent application for Priority Development Status. The Midcoast is an unincorporated area made up of subdivisions created over 100 years ago and is limited in its ability to accommodate new development. There are many environmental hazards like earthquake faults, erosion, flooding, tsunami zones and sea level rise that make many areas inappropriate for new building. In addition, the area is challenged by inadequate highway capacity, water availability and sewer services.

As part of the Coastal Zone, the Midcoast is subject to the regulations of the California Coastal Act. There has been little information available about how designation as a PDA will affect the Coastal Act protections that a majority of Californians voted into law and still overwhelmingly support. Evaluating how much additional development the area can support is an ongoing process and projections have been consistently downgraded with good reason over past decades.

There is a severe lack of public transportation on the Midcoast. The idea of building additional housing according to a model for transit-oriented development in area with almost no reliable public transit is absurd. Every time our local transit agency faces a budget shortfall, the one transit line we have on the Midcoast is threatened with elimination. The last time, senior citizens and those without motor vehicles who depend on the buses to go to and from work and school banded together and submitted a petition signed by over 400 desperate transit users, begging that bus service on the Midcoast be spared. If it were not for this organized, time-intensive effort, there is a very good chance that we would have lost the only public transportation we have, meager and inconvenient though it is.

While I understand the County's desire to receive funds for local planning projects, the Midcoast is not the appropriate place to receive the PDA designation. Investing funds here would be a misuse of public money that could be used far more effectively in areas with transit, more urban development patterns and better infrastructure. I urge you to remove the Midcoast from consideration for PDA designation.

Thank you so much for the opportunity to make my views known,

April Vargas
PO Box 370265
Montara, CA 94037
[650-207-2729](tel:650-207-2729)

Date: 2/6/2012 4:17:49 PM

To: KennethK@abag.ca.gov

Cc: JackieR@abag.ca.gov

Subject: Priority Development Areas

I am writing regarding designations of PDAs in Sonoma County. I am concerned that the 5 PDAs in Sonoma County - Forestville, Guernville, Penngrove, The Springs and Graton are all in rural areas and hardly immediately adjacent to metropolitan areas. Further, the designations were placed on the consent calendar of the Board of Supervisors, making me wonder if the designations were adequately vetted by the public who live in those local communities. I wonder if residents of those areas would consider their communities as candidates for focused growth as defined in the FOCUS overview.

It is my understanding that PDAs are to "....support focused growth by accommodating growth as mixed use, infill development near transit and job centers, with an emphasis on housing...." If that is an accurate portrayal of the purpose of PDAs, the Sonoma County areas proposed as PDAs do not seem to meet the criteria. Not one of them is located near transit - certainly not close to a proposed SMART passenger rail station - few if any are even served by Sonoma County Transit buses and if so are at the most minimal of service schedules. Neither are they located such that they could possibly meet the definition of infill development, being in the outlying areas far from incorporated city limits, with the requisite empty infill parcels that constitute the definition of a candidate for infill development opportunities. There certainly are no job centers in any of the 5 areas.

I am mystified why an unincorporated county area such as Roseland, close to downtown Santa Rosa and adjacent to its city boundaries which would seem to better meet the definition was not designated. Having lost redevelopment support for a major planned mixed use development that would have translated into many jobs, parks and affordable housing, the Roseland area would seem far better suited as a PDA. And Roseland would be better served, having plenty of vacant and underdeveloped parcels for infill, mixed use development opportunities. The area has a great need and strong community based support for residential/affordable housing opportunities and the mixed use development with attendant jobs recently lost to the demise of redevelopment. And while not immediately adjacent to a proposed SMART station, it is a 15 minute walk from the Railroad Square SMART Station and an easy bike or shuttle ride w/ City Bus service.

I admit to being a late comer to this process. However, having been an advocate of mixed use transit based development and affordable housing for many years when I lived and served as an elected in the East Bay, I find the designations curious to say the least.

Thank you for your consideration of my comments.

Norma Jellison
PO Box 1636
Bodega Bay CA 94923



SIERRA
CLUB
FOUNDED 1892

Ken Kirkey, Director of Planning
ABAG
P. O. Box 2050
Oakland, CA 94604-2050

March 8, 2012

Re: Applications by San Mateo County for Priority Development Area status for the Midcoast area and by Sonoma County for the Graton, Forestville, Guerneville, and Penngrove areas

Dear Mr. Kirkey,

On behalf of the Redwood Chapter, San Francisco Bay Chapter and Loma Prieta Chapters of the Sierra Club we have a strong interest in MTC & ABAG's ongoing efforts to reduce vehicle miles traveled in the Bay Area and to encourage growth patterns that support that objective.

We support the idea that "Priority Development Areas" (PDAs) with higher density housing and higher employment opportunities should be identified along major transportation corridors served by public transit. However, the use of such designations to address the needs of unincorporated, low population areas not located on major corridors nor served by significant public transit appears to undermine the idea. Should such areas have specific focused needs that have the support of local shareholders then such needs can be addressed without the PDA designation being deployed.

The Sierra Club is also committed to the public process and we are disappointed at the dearth of outreach to the affected communities in both counties preceding these applications.

We ask that the applications referenced above not be forwarded for approval and that San Mateo County and Sonoma County be offered a more appropriate avenue of funding for needed projects.

Cordially,

Jay Halcomb

Redwood Chapter
Chair

Arthur Feinstein

San Francisco Bay Chapter
Chair

Ginny Laibl

Loma Prieta Chapter
Chair

As a resident of El Granada, Ca for more than a quarter century, I am greatly disturbed about designating the Highway 1 corridor from Devil's slide south portal to Half Moon Bay as a PDA. I understand the use of PDA should occur when an area has higher density housing, higher density employment opportunities along major transportation routes served by public transit. Highway 1 from the south portal of Devil's Slide portal to Half Moon Bay does not fit this description.

Should the requirements of the Midcoast grow to fit the description of what's needed to qualify for a PDA, then it would make sense to do so. As a MidCoast resident, I oppose our pristine surroundings designated a PDA.

Please feel free to contact me at your leisure.

Sincerely,

Robert D Kline
600 Isabella Road
El Granada, Ca 94018
Phone : 650-726-9300

Hello,

As a resident of the coast for 15 years, I am writing to request that ABAG deny the approval of the PDA Application for the unincorporated San Mateo Midcoast, submitted by the San Mateo Planning and Building department.

The community had not been informed of our County's plan to apply for the PDA designation, nor the possible impacts it could have on our unincorporated communities for years to come. The PDA application was on the Board of Supervisor's consent agenda. There was no opportunity for our residents to be educated on a very complicated program. The public workshops that were held (not in our area) have been consistently full and to my knowledge did not address the issue of the "Rural Corridor" place type.

Actually, the concept of designating the Midcoast as a "Rural Corridor " is incongruent with the original intent of SB 375, namely, planning for housing and jobs near transit. Our public transportation is extremely meager. As a mom, I have had a very difficult time just getting my child from El Granada to Half Moon Bay, a 5- 6 mile trips, because of minimal public transportation. The only shuttle and bus we do have has consistently been threatened to be discontinued because of lack of funding.

On the Midcoast housing greatly exceeds the amount of jobs. Our residents cannot take public transportation to employment on the Bayside, it doesn't exist. In addition, our LCP as not been approved by the Coastal Commission, yet all new development must be in unison with the LCP. This, in and of itself, has the potential to wreak havoc in coastal planning.

Once again, I am asking that you deny the PDA application for the unincorporated Midcoast of San Mateo County.

Sincerely,

Laura Stein
PO Box 246
El Granada, CA 94018
650-678-4084

Dear Ken Kirkey and ABAG Executive Board,

>
> As a San Mateo County resident, I am interested in how our
> county addresses the needs of voters in unincorporated, low
> population areas. San Mateo County did not adequately
> inform or involve local residents of the unincorporated
> rural communities in its plan to seek PDA designation. San
> Mateo County Supervisors had no idea whether local
> residents/voters/taxpayers of Montara, Moss Beach, El
> Granada, Princeton and Miramar wanted their communities to
> become PDAs when they voted to approve the proposed Rural PDA
> status.

>
> I do agree with plans to locate housing development near
> transit corridors and public transportation to reduce the
> miles we have to travel to work. How can your regional
> planning association suggest that increasing housing
> development on the Midcoast of San Mateo county will
> decrease travel miles? Already hundreds of cars commute over
> the mountains from the Coastsides daily to jobs on the
> Bayside. There are very few jobs on the Coastsides.
> People come to the Coastsides because of its rugged and
> unspoiled ocean views and trails, to get away from fixed
> public transportation (Caltrain/BART) and major transit
> corridors (Hwy 101/El Camino Real). People come to the
> Midcoast to escape urban sprawl and enjoy the natural beauty
> of its coast and mountains.

>
> Designating small Midcoast communities as PDAs to justify
> new housing development will not address the needs of
> Coastsides residents and visitors. The planned build out
> collides with some insurmountable facts: lack of potable
> water, already overextended sewer connections, lack of
> sewage treatment facilities, earthquake zones, coastal
> flooding and sea level rise, steep, cliff and bluff erosion,
> and ignores the Local Coastal Program and Coastal Act
> priorities and required reviews of all future development.

>
> PDA designation is just not appropriate for small, rural,
> coastal communities.

>
> Please include this letter in the staff report for the March
> 15th ABAG Executive Board Meeting.

>
>
> Lee Fernandez
> 405 Industrial Rd.
> San Carlos, CA
> 94070

William & Beihua Kehoe

891 Kelmore St.

Moss Beach, CA 94038

March 11, 2012

Ken Kirkey, Director of Planning, (kennethk@abag.ca.gov),

Ezra Rapport, Secretary-Treasurer, (ezrar@abag.ca.gov),

Jackie Reinhart (JackieR@ABAG.ca.gov) and

Dayle Farina (DayleF@ABAG.ca.gov).

Association of Bay Area Governments

101 Eighth St.

Oakland CA 94607

Subject: San Mateo County (SMC) Application for Priority Development Area (PDA) status for the Midcoast urban area

Dear Ken Kirkey et al:

I respectfully request that you deny San Mateo County's request to designate the SR 1 (Hwy 1) corridor on the San Mateo coast as a Rural Corridor place type so that SMC can apply for Priority Development Area funding.

It is my understanding that the objective of PDAs is to reduce congestion and environmental pollution by developing housing and services near job centers and transportation corridors. Neither of these objectives will be reached in the development of the Midcoast.

The Midcoast area consists of the five unincorporated communities of Montara, Moss Beach, El Granada, Princeton, and Miramar, which are located entirely within the County's Coastal Zone. The primary industry is visitor serving businesses (hotels, restaurants, shops ...), fishing and

agriculture. However, the majority of coastsiders commute "over the hill" to either San Francisco or Silicon Valley for their livelihood. We are served by only two SAMTRANS buses (#17 & #294). Route 17 (Montara to HMB) 90-min interval 8-6 (9-5 Sun); 60-min interval 6- 8 AM weekdays and Route 294 (Pacifica to San Mateo) 90-min interval 8-6 weekdays only, do not meet any real definition of a transportation corridor. It is notable that even this minimal SAMTRANS service has been difficult to maintain over the past several years due to revenues from ridership not justifying the costs.

Another issue to consider is the Midcoast area has significant constraints to new development, both geological (faults, erosion, slides) and topographical (coastal range, coastal plain, limited transportation corridors) which limit future expansion. There are potential conflicts with the certified County LCP in which housing has the lowest priority land use under the Coastal Act. Also, there is inadequate infrastructure, including water, sewer, and highway capacity, to accommodate the current planned build out of in this area. Likewise, because of the limited access to the Midcoast, the lack of critical mass of supportive industries and the limit of a large diversified labor pool, it is highly unlikely that there will be any significant job increases which would allow for a good balance of jobs/homes to justify this request.

Finally, although I am writing this letter as an individual, I serve as Chair on the Midcoast Community Council (MCC), a Municipal Advisory Council (MAC) to the San Mateo County Board of Supervisors (BoS), and contrary to the County's claim that this application was discussed at one of the MCC's public meetings in 2011, I can affirm that this was not presented in any coherent form. The MCC sent a letter (attached) to the BoS on January 23, 2012 asking for a delay in their application so the implications could be studied and the public informed but the Board decided to proceed anyway. This lack of public process should not be ignored and I ask you to remove the Midcoast from consideration for PDA designation.

Sincerely,

Bill & Beihua Kehoe
Moss Beach, CA
650-728-7255

March 11, 2012

Attn: Ken Kirkey, Ezra Rapport, Jackie Reinhart, and Dayle Farina

I am writing to you in support of the Committee for Green Foothills; the Redwood Chapter, the Loma Prieta Chapter and the San Francisco Bay Chapter of the Sierra Club; and others in opposition to the establishment of rural PDA's. Rather than repeat the well researched, well reasoned and well stated points each has made. please use my note as an endorsement of those points. I believe this is a well intentioned effort to try to direct much needed funds to areas with little ability to generate them. However, the consequences of such a change in designation will undo the intent of the original legislation.

Please vote 'NO' on Rural PDAs. Then find ways to improve the infrastructure of rural areas while maintaining them as a much needed refuge between the dense urban areas.

Sincerely

Kathryn Slater Carter

ksc@sonic.net

650.346.5255

P.O. 370321
Montara, Ca
94037

Hi, Jackie,

Thank you for your email about the process.

I understand ABAG planning staff is not recommending designating the Rheem planning area a priority development area. I understand staff's reasoning, but I thought it beneficial to provide some additional background and information.

The General Plan does not show significant density for the entire area, but the Town expanded the PDA to accommodate ABAG's minimum size requirements. In addition, the Town submitted its application in advance of a planned General Plan Amendment for the Rheem Planning Area, wherein the Town anticipates higher, mixed use densities. Finally, the area is a concentration for jobs. Between long-term planning for higher density housing and job concentration, the Town of Moraga felt the Rheem provided a good model for planning a mixed use village with easy access to two BART stations.

The Town concurs with ABAG's assessment regarding transit service, though the Town also finds it ironic. Not long ago, Moraga had 20-minute headways for County Connection buses to Orinda and Lafayette BART. Recently, bus service has increasingly been cut. Moraga is a pilot program for a Realtime Ridesharing program with Contra Costa County Transportation Authority (CCTA) to improve our connection to BART via alternative means, but it isn't enough. Ideally, a regular circular or shuttle would provide service between the Rheem and Moraga Center and the two neighboring BART stations, with 15-minute headways. This circular or shuttle system would diminish Moragan's dependence on the auto, improve pedestrian and bicycle circulation, alleviate traffic congestion, improve overall connectivity, and benefit Moraga's residents and workers, many of whom live outside of Moraga.

In other words, the Town sees the value, regional benefit, and long-term vision of naming the Rheem area a Priority Development Area.

Please forward our comments to the ABAG Regional Planning Committee.

Regards,

Shawna Brekke-Read
Planning Director
Town of Moraga
925/888-7043

Dear Chair Luce and ABAG Executive Board members,

The Coastside Bicycle Coalition supports the concerns outlined in the three attached letters from the Sierra Club, Greenbelt Alliance, and Committee for Green Foothills regarding the proposed San Mateo County unincorporated Midcoast Rural Priority Development Area (PDA).

The Coastside Bicycle Coalition is concerned about the lack of local participation in the County's recent decision to apply for a PDA designation in the unincorporated Midcoast. We did not receive adequate notification about the County PDA application. We are very concerned that this item was put on the Board of Supervisors consent calendar without first vetting it through the public.

Please include the San Jose Mercury News article regarding the proposed Midcoast PDA in the March 15, 2012 Executive Board staff report. Link: http://www.mercurynews.com/san-mateo-county-times/ci_20132790/rural-san-mateo-county-activists-and-others-around

The Coastside Bicycle Coalition supports reducing auto travel and improving bicycle and pedestrian safety; however, Measure A is the appropriate avenue for funding these projects.

We respectfully request that ABAG not approve the proposed PDA for the unincorporated Midcoast.

Sincerely,

Sabrina Brennan

COASTSIDE BICYCLE COALITION Serving San Mateo County Bicyclists

Midcoast Community Council

*An elected Municipal Advisory Council to the San Mateo County Board of Supervisors
Serving 12,000 coastal residents*

Bill Kehoe
Chair

Laura Stein
Vice-Chair

Lisa Ketcham
Secretary

Bob Kline
Treasurer

Len Erickson

Dan Haggerty

David Vespremi

January 23, 2012

President Adrienne Tissier and Members
San Mateo County Board of Supervisors
400 County Center
Redwood City, CA 94063

Subject: BoS Consent Agenda Item 27 (1/24/12) – Resolution in support of the application for Priority Development Area status for the Midcoast Urban Area.

Honorable President and Members of the Board of Supervisors:

The staff report for this item states that the “concept of a PDA for the Midcoast was discussed with the MCC in 2011”. None of the four continuing councilmembers who were on the 2011 MCC, feel that an adequate discussion of the PDA concept occurred. We have received public comment with the same concerns.

We don’t see the urgency to bypass the public process due to potential delay in one possible funding opportunity. The Hwy 1 Mobility Study conceptual plan has not yet received public comment and approval, following which development of an Action Plan would still be needed. Therefore, the prospect of a delay of one year on project funding does not seem critical. It is also important that project reviews and permitting not be rushed due to the pressure of grant-spending deadlines.

The staff report states that the County proposed the Midcoast Urban Area as a Mixed-Use Corridor type of Growth Opportunity Area (GOA) in 2011, but this was not included in the ABAG 2011 Vision Scenario. When the “Rural Corridor” place type was created in September 2011, the County determined to apply for Midcoast PDA status under that definition. There was abundant time to bring this idea to the MCC for community discussion.

We note that applications for Priority Development Area designation are received and reviewed on a quarterly basis. We ask that you delay consideration of application for Midcoast PDA designation for 45 days in order to give the community time to study and thoroughly understand the ramifications of this step.

Thank you for your consideration.

s/Bill Kehoe
Chair, Midcoast Community Council

Chair Mark Luce and Executive Board
Association of Bay Area Governments
101 8th Street
Oakland, CA 94607

March 9, 2012

Re: Proposed new Priority Development Areas

Dear Chair Luce and ABAG Executive Board members,

The undersigned organizations wish to comment on the proposed Priority Development Area applications and on the new Rural Town Center/Rural Corridor and Employment Center PDA place types. We make the following requests of the Board:

- 1. Do not approve any of the Rural Town Center/Rural Corridor or Employment Center PDA applications.**
- 2. Remove the Rural Town Center/Rural Corridor and Employment Center place types from the PDA framework; direct staff to develop alternative approaches to addressing the needs of these areas through a robust, thoughtful policy development effort that engages all stakeholders.**
- 3. If you do choose to approve any Rural Town Center/Rural Corridor or Employment Center PDA applications, ask staff to provide detailed information verifying that the application meets all the criteria you adopted for that place type.**

Our reasons for making these requests are as follows:

The new place types could lead to outcomes that run counter to the goals of FOCUS and the SCS

The core PDA framework was created primarily to address three essential regional goals:

1. Minimize sprawl development by focusing growth in existing developed areas
2. Reduce vehicle miles traveled by focusing growth near transit
3. Address the region's chronic housing shortage by encouraging the production of housing

Encouraging economic development and helping rural areas become more complete communities are also important regional goals. However, these are complex policy issues that need to be thought through as carefully and comprehensively as was the original PDA framework. If they are not, we risk not only running counter to the original goals of the PDA framework but also missing the mark on maximizing progress toward the new goals. Specifically:

The Rural Town Center/Rural Corridor place type risks promoting sprawl

Throughout the SCS process, the Priority Development Areas have been described and used as the places that will accommodate the vast majority of the region's growth moving forward. Rural areas far from transit and job centers are simply not the right place to accommodate large amount of market-rate growth, though they may need targeted, well-planned housing growth to accommodate lower-income workers. Yet rural areas that are "being planned for more housing" are eligible for the PDA designation.

In addition, the criteria say nothing about the form or quantity of proposed development, which could easily lead to sprawl. For example, the San Mateo Midcoast PDA application proposes 1000 new homes at densities as low as 2 units/acre.

If the intent of the Rural Town Center/Rural Corridor place type is *not* to encourage more growth in outlying rural areas but is instead simply to make existing rural areas more complete communities and improve connectivity, then this should be done outside the Priority Development Area framework.

The Rural Town Center/Rural Corridor place type risks increasing VMT

Most Rural Town Center/Rural Corridor areas are far from job centers and are not near fixed transit or served by high-quality bus service. Increased development in these locations beyond low-income workforce housing will almost certainly increase vehicle miles traveled and undermine the goals of the SCS.

The Employment Center framework may not be the best way to maximize economic development

The Employment Center PDA place type focuses only on making existing job centers more mixed-use and walkable. While this is a good goal, it is likely to have relatively little impact on economic development. There may be more important ways we can use our limited regional dollars to strengthen employment. The Bay Area was recently awarded a grant from the department of Housing and Urban Development to create an economic development strategy for the region. The region should use this process to determine the most effective employment-related policy measures. For example, we may find that using regional funds to incentivize maintaining a sufficient supply of industrial land is a more impactful economic development strategy.

The Employment Center place type risks exacerbating jobs/housing imbalances

Making employment centers more mixed-use and pedestrian-friendly are laudable goals. However, without a strong incentive to build homes, jobs-rich areas may continue to add more jobs *without* adding sufficient housing. The current criterion that “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” is insufficient to ensure jurisdictions are continually *building* homes at a rate commensurate with employment growth.

CEOs of Bay Area companies identified “High housing costs for employees” as the number one business challenge every year for the past seven years.¹ Increasing the supply of homes at a rate that keeps pace with employment growth will help the Bay Area retain its regional competitive edge for attracting and retaining job-producing businesses.

The Employment Center place type risks increasing VMT

The question of whether employment growth in outlying areas of the region that are currently housing-rich will help or hinder our regional goals is a controversial one. But initial evidence from analysis of the five SCS alternative scenarios shows that the “Outward Growth” scenario does end up with higher VMT than the other scenarios. The current criterion that “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” may actually encourage job growth in outlying, housing-rich locations and thereby increase VMT.

¹ CEO Business Climate Surveys 2005-2011, Silicon Valley Leadership Group - <http://svlg.org/press/library>

Thoughtful dialogue and sufficient discussion are needed for effective policy development

As the staff memo notes, the first PDAs were adopted in 2007 following the launch of the FOCUS program. For five years, PDAs were required to meet three criteria:

1. The area is within an existing community.
2. The area is near existing or planned fixed transit (or served by comparable bus service).
3. The area is planned or is planning for more housing.

These criteria were developed through many years of extensive discussion with stakeholders, including local government staff and elected officials as well as members of the public and the nonprofit community. There were many iterations of policy development carefully vetted through ABAG and MTC's own advisory bodies as well as the Executive Board and Commission and their sub-committees.

Since then, similarly detailed and thoughtful work has gone into tailoring funding programs to support the PDAs. These discussions have been based on an understanding of the PDA criteria and framework as it had existed for five years.

The new Rural Town Center/Rural Corridor and Employment Center place types deviate substantially from the core PDA framework. These new place types were adopted by the ABAG Executive Board in September without having been brought to any of the agencies' own advisory boards (e.g. ABAG Regional Policy Committee, MTC Policy Advisory Council, Regional Advisory Working Group or FOCUS Working Group) for discussion before adoption. Nor were the new place types brought to any MTC or ABAG committees or boards for discussion; the proposal was brought exactly once to the ABAG Executive Board for adoption that very night.

A hasty process can result in poor outcomes and ineffective policies, as outlined above. The Executive Board should insist on a more comprehensive process to develop policies in this arena before taking actions.

At a minimum, ensure that the nominated PDAs actually meet the adopted criteria

The criteria for an Employment Center PDA include the requirement that "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."

Staff is recommending adoption of several Employment Center PDAs in jobs-rich Silicon Valley cities such as Mountain View and Sunnyvale. The staff report does not provide information about the current or future jobs per household ratio in these cities, but it seems unlikely that these cities meet this criterion. In fact, the EIR for the Mountain View General Plan 2035 states that under the preferred scenario, the ratio would be "1.9 jobs for every residential unit."

Similarly, we question whether all of the Rural Town Center/Rural Corridor PDA applications meet the criteria that "The areas are existing town centers (not co-terminus with other urban communities) and/or are along a corridor through a rural area" and "Areas have an urban growth boundary or other zoning policy in place, such as an urban service area, to limit sprawling development." From a cursory glance at the San Mateo Midcoast PDA application, it is far from clear that the 5357 acres that are included in that application fit those criteria.

Again, we urge the Board to remove the Rural Town Center/Rural Corridor and Employment Center place types from the PDA framework entirely, and not to approve any PDAs of these types. However, at a minimum, the Board should require a full report - verified by regional agency staff - on whether each proposed PDA meets the criteria, and should not adopt PDAs that do not meet the established criteria.

Thank you for your consideration of our comments.

Sincerely,

Stephanie Reyes
Policy Director
Greenbelt Alliance

Allison Brooks
Chief of Staff
Reconnecting America

Ed Thompson
Executive Director
American Farmland Trust

Sam Tepperman-Gelfant
Staff Attorney
Public Advocates

Jeff Hobson
Deputy Director
TransForm

Evelyn Stivers
Field Director
Non-Profit Housing Association of Northern California



11 March 2012

To: Ken Kirkey, Director of Planning
Ezra Rapport
Jackie Reinhart
Dayle Farina
ABAG
P.O. Box 2050
Oakland, CA 94604-2050

Cc: ABAG Executive Board
Sierra Club: Redwood, San Francisco Bay, and Loma Prieta Chapters
City Council of Palo Alto
Occupy Mountain View
Occupy Oakland
Occupy Palo Alto
Occupy San Francisco
Occupy Stanford

Re: The greenwashing of SB375 and the lack of public accountability in the development process, as illustrated by the handling of San Mateo County's application for Priority Development Area status for the mid-coast area.

On behalf of the people of the Peninsula, the General Assemblies of Occupy Redwood City, Occupy Half Moon Bay, and Occupy San Jose stands in solidarity with the Redwood, San Francisco Bay, and Loma Prieta Chapters of the Sierra Club in calling on ABAG to reject San Mateo County's application for Priority Development Area (PDA) status for the coastal areas of the Peninsula.

We agree with the spirit of SB375 and that the development of higher density housing and employment opportunities should be focused along major transportation corridors served by public transit. With that in mind:

We see the potential designation of the San Mateo County coast as a PDA as a blatant subversion of SB375 and an attempt by business interests to greenwash development projects on the coast under the mantle of smart growth. As Occupiers, as members of the 99%, and as concerned citizens, we proudly say that ***Rural Development is Not Green.***

We agree with the local Sierra Club chapters that the needs of unincorporated, low population areas should be addressed without a PDA designation that could open up valuable tracts of protected land, open space, and agricultural assets to forced development.

We also decry the near-complete lack of public outreach and accountability in the development process, especially in light of the fact that not a single elected official who sits on the ABAG executive board directly represents the San Mateo County coastline (County Supervisors Pine and Gibson represent

districts that do not include the coast). The recent “Plan Bay Area” workshops were limited to one per county and they were not well publicized in most communities.

We know that these attempts to greenwash projects that ultimately do not help our environment or the people of our state are precisely what occurs when there is a closed process with very little public accountability. While many understand that the Occupy slogan of “We Are the 99%” speaks to economic injustice, we say that the Bay Area’s regional planning process as represented by ABAG is yet another example of the 99% being shut out of the decisions that will affect their lives by the few in power and by the 1%-funded interests to which they’re beholden.

We demand more sunshine to what is a very complex and involved planning process. We kindly call for public workshops to be held in all Bay Area cities and unincorporated communities to provide greater access and transparency. We kindly call on ABAG to reject San Mateo County’s application for a rural-development PDA, as well as Sonoma County’s application for a similar PDA.

Sincerely,

The General Assemblies of

Occupy Redwood City
Occupy Half Moon Bay
Occupy San Jose

We Are the 99%.

Add this to what would be the long list of correspondence opposing the Midcoast PDA application... something that would no doubt exist if the community were aware its existence. The fact is, the unincorporated San Mateo County Midcoast communities lack representative local government capable of advocating for such an application on their behalf. There is no city council. There is no mayor. We don't even have county supervisors elected by the districts they serve and none of the supervisors live in the area.

It is fair to say that the those acting on behalf of the Midcoast in advancing this application are not at all in tune with the unique needs and challenges of Midcoast residents and in this case in particular, have chosen to act without any input whatsoever from the community.

There has been literally zero public notice or community outreach on this application – not one solitary flier posted, not one workshop or town hall meeting, and despite a request from the Midcoast Community Council, our only local advisory board, no presentation on the relative merits of the application. Quite literally, this has been kept entirely under wraps. As such, there is no indication that the residents of the Midcoast communities are aware of or understand, let alone support, this application.

For this reason alone, the application should be denied for lack of public notice and support.

Separate and apart from this, based on ABAG's screening criteria, the application must be denied.

(1) The area is *not* near existing or planned fixed transit or comparable bus service. There is no light rail system. There are no commuter trains. There is no regular bus service for school children or adult residents. Prior to this application being submitted, there wasn't even discussion of studying the need for, or identifying prospective funding allocations towards, providing commuter services. It is not as though anything along these lines is in the works. Nothing has been done or likely can or will be done to provide a permanent transit solution for the Midcoast. Any discussion of this prospect now should be seen as what it is – lip service to meet ABAG application requirements.

(2) The area is *not* planned for more housing. The Midcoast LCP and its governing authority, the California Coastal Commission – oversee the entire Midcoast, all of which sits inside the Coastal Zone. Housing, and have capped any and all residential and

commercial development under the Midcoast LCP. Further, there is a moratorium on new water and sewer connections going back nearly thirty years.

(3) The areas impacted are *neither* within existing town centers *nor* along a rural corridor. None of the Midcoast communities of Montara, Moss Beach, El Granada, Miramar, or Princeton-By-The-Sea, can be characterized as towns. None of these have a city hall. None of these have a community center. None of these have a public library. In short, these are residential commuter communities as opposed to towns or cities. Although this area was rural in character many decades ago, and remains scenic thanks to the protections afforded us by the Midcoast LCP and the California Coastal Commission, it is a far cry from rural today. Ranching and farming activity – as would be characteristic of a “rural” area – both on a per capita basis and as a median source of employment or revenue is miniscule (single digit percentile).

(4) The areas encompassed are *not* being planned to include a mix of services to reduce vehicle miles traveled and/or for more housing with a mix of supportive services. See points 1 and 2 above.

(5) The areas are *not* being planned for more connectivity (multi-modal improvements, transit for employees and residents, etc.) and increased opportunities for walking and biking. Barring limited funding set aside for a statewide initiative that will see an ongoing expansion of the California Coastal Trail, no such connectivity plan exists today with any semblance of public support or funding, nor would any such plan be feasible as the vast majority of residents commute to either San Francisco or Silicon Valley to work – both of which are approximately equidistant from the Midcoast communities.

(6) The area *does* have an urban growth boundary or other zoning policy in place, such as an urban service area, to limit sprawling development and these policies, including *the Midcoast LCP and the General Plan both of which expressly prohibit high density housing and commercial development.*

For each of the above reasons, my family and I request that you deny the PDA application currently pending.

Sincerely,

David Vespremi

Moss Beach Resident



Town of Moraga

PLANNING DEPARTMENT

March 12, 2012

Ms. Jackie Reinhart
Association of Bay Area Governments
Via email

SUBJECT: Priority Development Area (PDA) Application for the Rheem Planning Area, Town of Moraga

Dear Jackie,

Thank you for your March 6, 2012 email regarding ABAG's process for considering Priority Development Area (PDA) applications. Thanks, too, to Sailaja Kurella for her February 22, 2012 email regarding ABAG staff's recommendation to the Regional Planning Committee. On behalf of the Town of Moraga, I am disappointed that ABAG staff is recommending to deny Moraga's application.

I understand ABAG planning staff's recommendation against designating the Rheem Planning Area a priority development area is based on two primary reasons: (1) The General Plan does not call for high enough densities, and (2) Transit service to nearby BART stations is inadequate. The Town of Moraga understands staff's reasoning, but, on behalf of the Town, I thought it beneficial to provide some additional background and information.

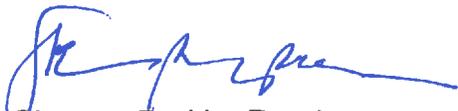
It is correct the 2002 Moraga General Plan does not show significant density for the entire area; instead, the General Plan's policies call for higher densities in approximately 50 acres of this area of town. The Town expanded the requested PDA boundaries to accommodate ABAG's minimum size requirements of 100 acres. In addition, the Town recognized the limited windows during which ABAG considers PDA applications. As such, the Town submitted its application in advance of a planned General Plan Amendment for the Rheem Planning Area. During recent meetings, community members, the Planning Commission, and the Town Council have stated an interest in higher, mixed use densities in the area. With a variety of employers, the area is also a concentration for jobs. Based on this vision, the Town of Moraga felt the Rheem provided a good model for planning a mixed use village in close proximity to San Francisco and Oakland, with easy access to two BART stations in Lafayette and Orinda. This application also appears consistent with ABAG's earlier FOCUS efforts and its One Bay Area vision.

The Town also understands the secondary reason for recommending denial - inadequate bus service to Orinda and Lafayette BART stations. The Town concurs with ABAG's assessment, though the Town also finds it ironic. Not long ago, Moraga had 20-minute headways for (Contra Costa) County Connection buses to Orinda and Lafayette BART. Recently, bus service has increasingly been cut. While Moraga is a pilot program participant in a Realtime Ridesharing program with Contra Costa Transportation Authority (CCTA) to improve our connection to BART via alternative means, this is not enough. Ideally, a regular circular or shuttle would provide service between the Rheem and Moraga Center and the two neighboring BART stations, with 15-minute headways. This circular or shuttle system would diminish Moragans' dependence on the auto, improve pedestrian and bicycle circulation, alleviate traffic congestion, improve overall connectivity, and benefit Moraga's residents and workers, many of whom live outside of Moraga.

In other words, the Town is recognizing ABAG's efforts to plan for One Bay Area. Through its PDA application, the Town is participating in a regional effort to focus jobs and housing in mixed use villages that are self-sustaining, and convenient to regional rapid transit. We hope ABAG concurs.

Please forward our comments to the ABAG Executive Board. And, please let me know if you have any questions.

Sincerely,



Shawna Brekke-Read
Planning Director