

September 23, 2015

Metropolitan Transportation Commission  
Association of Bay Area Governments  
101 Eighth Street  
Oakland, CA 94607

**Re: Plan Bay Area – Equity, Environment and Jobs Scenario 2.0**

Dear MTC Commissioners and ABAG Board members:

We write on behalf of members and allies of the 6 Wins for Social Equity Network, a regional coalition of over 20 organizations working to promote social, racial, economic and environmental justice in the Bay Area. As MTC and ABAG prepare to release their Plan Bay Area scenarios in November, **we urge you to include an updated Equity, Environment and Jobs Scenario (“EEJ 2.0”)**.

Key components of EEJ 2.0 are summarized on the attached sheet and include (a) prioritizing the needs of underserved communities, (b) expanding local transit service, (c) creating and preserving affordable housing opportunities in transit-rich and high-opportunity communities, (d) protecting low-income residents from displacement, (e) creating living-wage and middle-wage jobs for local residents, and (f) improving health and safety in Communities of Concern.

**Tackling Displacement Holistically**

The EEJ scenario offers a comprehensive solution to the defining challenge of the Bay Area today – the displacement of low-income families – by investing in community-identified priorities, improving local transit, increasing affordable housing and tenant protections, and growing livable-wage jobs.

Both the scope of displacement and the fact that Plan Bay Area is contributing to it are confirmed by recent analyses. UC Berkeley researchers have found that 69% of the region’s low-income renter households live in “Priority Development Areas (PDAs), and 69% of those households are also at risk of being displaced from PDAs.<sup>1</sup> At the same time, MTC and ABAG have highlighted the “inherent tension between the Plan’s emphasis on focused growth within [PDAs] and patterns of displacement risk in the region.”<sup>2</sup> While the region has made some initial commitments that could partially address this risk, MTC and ABAG recognize what low-income people around the region already know – that low-income communities and communities of

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<sup>1</sup> UC Berkeley, The Regional Early Warning System for Displacement (REWS) Study, available at: [http://iurd.berkeley.edu/uploads/CCI\\_Final\\_Report\\_07\\_23\\_15.pdf](http://iurd.berkeley.edu/uploads/CCI_Final_Report_07_23_15.pdf).

<sup>2</sup> MTC and ABAG, *Understanding Displacement in the Bay Area – Definition, Measures, and Potential Policy Approaches* (Sept. 4, 2015) 2-4.

color may “fail to benefit from [the] improvements” to their neighborhoods, given the high probability of their displacement from PDAs.<sup>3</sup>

The updated EEJ scenario gives MTC and ABAG the opportunity to meaningfully address this tension by incorporating lessons from the previous round of Plan Bay Area into the early stages of this round. The EEJ scenario studied in 2012-13 presented a vision of equitable focused growth and increased transit service that reduced displacement risk significantly,<sup>4</sup> but this realization came late in the process.

### **Housing Affordability + Housing Stability + Local Transit + Jobs = Health**

The EEJ scenario also offers a comprehensive approach to improving health outcomes. For example, access to affordable, stable housing means families aren’t diverting income away from other important household needs such as healthy food, medical care, and childcare<sup>5</sup>; living in crowded conditions that can cause stress and spread communicable diseases<sup>6</sup>; or traveling long distances to work, damaging air quality and increasing congestion, asthma and other respiratory diseases.<sup>7</sup> The health impacts of housing instability are particularly intense for children, causing behavioral problems, depression, low birth weights, and other health conditions like asthma.<sup>8</sup>

Likewise, for the millions of “transit-dependent Bay Area residents who do not own or have access to a car, public transportation is a lifeline to jobs, education, family and friends, healthy, affordable food, recreation, and medical care, all of which are essential for individual health and wellbeing.”<sup>9</sup> In particular, “[m]any bus riders are also people with disabilities, seniors, and youth who rely on the bus everyday to get to places essential for their health.”<sup>10</sup> For transit riders, reduced service means longer waits, increased stress, safety concerns, more vehicle miles traveled and greenhouse gas emissions, cutting back on food and doctor visits to afford increased transportation costs, and missing work, school, and medical appointments.<sup>11</sup>

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<sup>3</sup> Id.

<sup>4</sup> The EEJ Alternative placed 15,800 fewer struggling families at high risk of displacement. See UC Davis analysis, available at [http://www.publicadvocates.org/sites/default/files/library/uc\\_davis\\_comparison\\_of\\_draft\\_pba\\_with\\_eej\\_alternative\\_summary.pdf](http://www.publicadvocates.org/sites/default/files/library/uc_davis_comparison_of_draft_pba_with_eej_alternative_summary.pdf).

<sup>5</sup> Joint Center for Housing Studies of Harvard University, *The State of the Nation’s Housing 2013* (2013), available at <http://www.jchs.harvard.edu/sites/jchs.harvard.edu/files/son2013.pdf>; Kushel, M. B., Gupta, R., Gee, L. and Haas, J. S., Housing Instability and Food Insecurity as Barriers to Health Care Among Low-Income Americans, *Journal of General Internal Medicine* (2006) 21: 71–77.

<sup>6</sup> Causa Justa :: Just Cause, *Development without Displacement: Resisting Gentrification in the Bay Area* (2014), available at <http://cjjc.org/images/development-without-displacement.pdf>.

<sup>7</sup> Department of Public Health, City and County of San Francisco, *Traffic density* (2014), available at <http://www.sfindicatorproject.org/indicators/view/46>; Causa Justa :: Just Cause, *Development without Displacement*.

<sup>8</sup> Jolleyman, T. and N. Spencer. Residential Mobility in Childhood and Health Outcomes: A Systematic Review, *Journal of Epidemiology and Community Health* (2008); Gilman, S. E., Kawachi, I., Fitzmaurice, G. M., & Buka S.L., Socio-economic Status, Family Disruption and Residential Stability in Childhood: Relation to Onset, Recurrence and Remission of Major Depression, *Psychological Medicine* (2003) 33 (8), 1341-1355; Cohen, R., & Wardrip, K., *Should I Stay or Should I go? Exploring the Effects of Housing Instability and Mobility on Children*, Center for Housing Policy (2009), available at <http://www.nhc.org/media/files/HsgInstabilityandMobility.pdf>.

<sup>9</sup> Alameda County Public Health Department, *Getting on Board for Health: A Health Impact Assessment of Bus Funding and Access* (May 2013) 1, available at <http://www.acphd.org/media/308854/transithia.pdf>.

<sup>10</sup> Id.

<sup>11</sup> Id. at 2-4.

Finally, a stable job with fair wages and benefits in the middle wage or above range allows individuals to provide their families with healthy food, quality childcare, and a healthy neighborhood, and increase life expectancy.<sup>12</sup>

## **Transit Service Leads to Jobs, Opportunity, and GHG Reductions**

Increased transit service also has benefits that cut across jobs, housing, health and the environment. For example, research shows that transit operating expenditures create about 70% more jobs than spending on capital projects,<sup>13</sup> affordable housing near entry-level jobs improves access to economic opportunity, and preventing displacement of low-income households and including affordable housing near transit increases ridership and reduces GHGs.<sup>14</sup> Similarly, investing in robust local transit operations is the most cost-effective way to maximize GHG reductions, and affordable housing near jobs directly reduces driving.

## **Include the EEJ Early in the Process**

Rather than again deferring its study of the EEJ until the Environmental Impact Report (EIR) at the very end of the planning process, MTC and ABAG should study it at the outset, alongside other scenarios. This will give decision makers and the public more time to understand, analyze and refine the scenarios in order to develop a new Plan Bay Area that will most strongly promote all of the “three Es”: equity for low-income communities and communities of color, economic opportunity, and environmental health.

In the previous round of Plan Bay Area, the community-driven EEJ scenario outperformed the others, not only on social equity performance measures, but on greenhouse gas (GHG) reduction and other important regional goals. When MTC and ABAG evaluated the EEJ alternative in the EIR for Plan Bay Area, they found it was “environmentally superior” to the other alternatives. MTC and ABAG also found that the EEJ alternative performed better than the plan developed by regional agency staff on a range of important regional goals. For instance, by removing 83,000 cars from our congested roads, and increasing transit boardings by 165,000 per day, the EEJ alternative would have reduced daily vehicle miles traveled by 3.5 million miles, and annual emissions by over half a million tons a year more than the adopted Plan Bay Area. It would have put tens of thousands fewer families at risk of flooding from sea-level rise and billions of dollars more into filling potholes on local streets and roads. It would have done all this while also providing the greatest benefits to disadvantaged families and protecting them the most from displacement.

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<sup>12</sup> Robert Wood Johnson Foundation, “Culture of Health” (Jan. 2013), available at [http://www.rwjf.org/en/culture-of-health/2013/01/stable\\_jobs\\_health.html](http://www.rwjf.org/en/culture-of-health/2013/01/stable_jobs_health.html).

<sup>13</sup> Economic Development Research Group, *Job Impacts of Spending on Public Transportation: An Update* (Prepared for American Public Transportation Association, Apr. 29, 2009) 6-8, available at [http://www.apta.com/gap/policyresearch/Documents/jobs\\_impact.pdf](http://www.apta.com/gap/policyresearch/Documents/jobs_impact.pdf).

<sup>14</sup> TransForm and California Housing Partnership Corporation, Why Creating and Preserving Affordable Homes Near Transit is a Highly Effective Climate Protection Strategy (May 2014) 3, 7-10, available at <http://www.chpc.net/dnl/AffordableTODResearch051514.pdf>.

In addition to including an EEJ scenario, MTC and ABAG should advance social equity outcomes in *all* of the scenarios by ensuring that investments are made in underserved communities that (1) meet an important need identified by low-income residents of the community, (2) result in significant benefits, (3) target those benefits to lower-income residents and households, and (4) avoid harms to the community, such as displacement.

**Including and analyzing an equity scenario early in the process** will provide the public and decision-makers with important information about the range of choices available, give us time to work together to develop the details, and result in the best outcomes for our region. We look forward to working with staff to fully develop the EEJ 2.0.

Sincerely,

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## Draft Equity, Environment and Jobs Scenario 2.0

September 2015

- **Set-aside for underserved communities:**

- Invest at least 25 percent of the “discretionary” portion of Plan Bay Area 2040 revenues (about \$2 billion) over the first four years of the Plan in projects and programs identified as priorities by Communities of Concern through community-led processes.
- Provide \$2 million in 2016 grants to community-based organizations with low-income and minority members in Communities of Concern to allow them to lead inclusive priority-setting discussions and identify the projects and programs responsive to priority unmet needs.
- To provide meaningful benefits to Communities of Concern, investments must meet four requirements: 1) address an important community need, 2) result in significant benefits, 3) be targeted to lower-income residents and households, and 4) avoid harm to the community (e.g., displacement).

- **Transportation:**

- Increase local transit service by growing the amount of regional operating funds available to run increased levels of local transit service – including prompt implementation of the “Campos Amendment” from Plan Bay Area 1.0 (which required MTC to develop a plan to “expand the funding available to support future increases in transit service”).

- **Housing and displacement:**

- Prioritize investments and provide incentives that (1) strengthen and stabilize communities vulnerable to gentrification and displacement and (2) create and preserve affordable housing opportunities in transit-rich and high-opportunity communities that meet the regional need in all Bay Area cities.
- Ensure that all local jurisdictions that receive funding have a locally appropriate set of anti-displacement and affordable housing policies in place, and prioritize funding to those jurisdictions that have particularly strong policies.
- Tie affordability levels of new housing to the existing needs of local residents and workers, with particular attention on the availability of housing for those who are extremely low- and very low-income.

- **Jobs:**

- Design land use, development and transportation projects to directly and indirectly create high quality jobs that pay good wages and benefits and create

career ladders for all Bay Area residents, with an emphasis on disadvantaged residents and communities, and encompassing urban, suburban and rural communities.

- Prioritize regional investments in ways that support good, livable-wage jobs and economic opportunity for all of the Bay Area's diverse communities, with a particular focus on creation and retention of living-wage and middle-wage jobs in Priority Development Areas and Transit Priority Areas.
- Prioritize local projects and programs that incorporate strategies or pilots intended to:
  - Increase the share of lower-wage jobs that provide a self-sufficiency wage within the project area or the local jurisdiction, and/or
  - Grow moderate-to-middle-wage jobs in the project area or jurisdiction and increase access to those jobs for local residents.
- **Healthy and safe communities:**
  - Prioritize transportation investments that will improve health and safety, especially in Communities of Concern, and that equalize mortality rates by race and income.
  - To improve health outcomes, protect existing residents from displacement, preserve and produce affordable housing near transit and jobs and in healthy and safe communities, improve local transit, and grow livable-wage jobs in transit-accessible areas.

TO:

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