

September 11, 2018

Members of the MTC Planning Committee Members of the ABAG Administrative Committee

Via email: msilver@bayareametro.gov

Re: Agenda Item 7a: Perspective Paper #2 (Strategies to Reduce Congestion)

Dear Committee Members:

The Building Industry Association of the Bay Area (BIA) appreciates the opportunity to comment on Perspective Paper #2. Reducing congestion is vital for the Bay Area and BIA is pleased that MTC and ABAG are prioritizing the issue in the Perspective Paper series.

BIA has the following comments and concerns regarding the Perspective Paper's overall approach and the specific strategies identified:

- The Paper's title and the presentation summary refer to "congestion reduction." That appears to be the "sales pitch" (to borrow a phrase from the presentation). However, all of the strategies identified are aimed at "VMT reduction," *i.e.*, getting people out of their cars. Whatever the merits of the overall goal of VMT reduction or the specific strategies to achieve it, when the average Bay Area resident or in-commuter is "pitched" on addressing congestion reduction, that person is going to expect that at least some of the strategies will focus on the supply side of the equation either by expanding the transportation network's capacity or its efficiency so that *when they drive* they experience less congestion.
- With respect to the proposed strategies to reduce VMT, BIA has concerns about the proposal to impose new mandates (and costs) on new development projects if it were to include housing or mixed-use projects. The already astronomical cost of new housing construction in the Bay Area is well-documented. Adding to this cost by requiring housing developers (and ultimately buyers and renters) to pay for public transportation for future residents or "demand management" programs would be inconsistent with the paramount Horizon guiding principle that "All Bay Area residents and workers have sufficient housing options they can afford."
- BIA also believes it is inappropriate to present the "Required TDM for New Development" (to the extent it were to include residential and mixed-use projects) as advancing the Horizon's "Healthy" goal. That goal relates to conserving "the region's natural resources, open space, clean water and clear air." Affixing the "Healthy" label to the new development mandate would seem arbitrary.

MTC & ABAG September 11, 2018 Page Two

• Increasing the supply of housing (for-sale and rental) for all income levels within the Bay Area region is one of the most effective strategies for reducing congestion and VMT. In-commuting from the Central Valley and Sacramento areas is a massive contributor to VMT. Increasing housing availability and choices within the Bay Area ought to be identified as a key congestion/VMT reduction strategy in the Perspective Paper.

Yours very truly,

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