



April 14, 2020

Kamala Parks
Senior Planner – Stations Planning, BART Planning & Development
San Francisco Bay Area Rapid Transit District
P.O. Box 12688
Oakland, CA 94604-2688

Sent via email to: KParks2@bart.gov and [cc boardofdirectors@bart.gov](mailto:cc_boardofdirectors@bart.gov)

Re: BART's Proposed Framework for Affordable Housing Land Discount Policy

Dear Kamala,

We are writing to inform BART's Proposed Framework for the Affordable Housing Land Discount Policy. Thanks to staff for all of their incredible and thoughtful work thus far. **Discounting BART land is a key tool for making affordable housing more feasible to build** in the Bay Area, and has an important role play to in alleviating our region's crushing affordability crisis. Publicly owned BART land is a public good that should be used to serve the needs of the community, and particularly low-income households whom the market perpetually fails to serve. We also want to ensure that the policy has the intended impacts of delivering affordable units on BART land as quickly as possible, and fully support and agree with the amendments proposed by East Bay Housing Organizations and the Nonprofit Housing Association of Northern California.

Since 1997, TransForm has worked to address climate change and inequity with transportation and land use policies, innovative pilot projects and research. TransForm brings together diverse groups focused on planning, equity, and the environment in support of public transportation, smart growth, affordable housing, and bicycle and pedestrian safety to create more equitable, healthy, connected communities in the Bay Area, California, and beyond.

TransForm has long supported AB 2923 (Chiu), and we continue to work with BART to maximize the equity, traffic and transportation benefits of its developments, including currently at El Cerrito Plaza and Lake Merritt BART Stations. With 250 acres spread across 27 stations, we're pleased that BART is furthering its role in being a leader in creating vibrant, diverse, affordable, mixed-income, equitable, walkable, and transit-oriented communities. An Affordable Housing Discount Land Policy can accelerate **by many years** BART's ability to reach the adopted goal of producing 7,000 affordable units, and 20,000 new units overall, by 2040.

As a high-quality transit provider, BART in particular has an opportunity to support the creation of affordable housing exactly where it should be—close to transit. TransForm's report, "[Why Creating and Preserving Affordable Housing Near Transit is a Highly Effective Climate Protection Strategy](#)," shows that low income residents are more likely to take transit and give up their cars. In particular, our reports found that lower income households drive 25-30% fewer miles when living within 1/2 mile of transit than those living further away, and drive 50% less when living within 1/4 mile of frequent transit. **Higher Income households drive more than twice as many miles and own more than twice as many vehicles as Extremely Low-Income households living within 1/4 mile of frequent transit.** While BART's TOD policy is an essential piece of the puzzle, affordability is a key aspect of ensuring these land use decisions result in increased BART ridership, increased



value capture for the public, and have the greatest public benefit and reduction in vehicle miles traveled and greenhouse gas emissions.

Discounting the value of BART land could help close the gap in local funding for affordable housing, particularly in communities that do not have significant funding sources. The process of financing, developing, and constructing affordable housing can be long and expensive. Land costs could contribute between 10-25% of a project's total development costs. Having a discount policy will make affordable housing construction more feasible on BART land and in turn make it more competitive for state funding that will go towards building affordable homes. Additionally, a land discount policy will also make BART more competitive for state funding for its other priorities such as replacement parking, through the Infill Infrastructure Grant program, and bike and pedestrian improvements, through the Affordable Housing and Sustainable Communities program.

We ultimately support land ownership that is held in perpetuity and that developers are paying long term lease revenues. We do not support sale of public property for private development.

We look forward to reviewing the final policy and thank staff for all of their incredible and thoughtful work thus far. Thank you again for the opportunity to provide feedback.

Sincerely,

Hayley Currier
Policy Advocacy Manager
TransForm