



March 25, 2014

Joan Ryan
Senior Planner, City of Concord
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(925) 671-3370

Re: Draft Downtown Concord Specific Plan

Dear Ms. Ryan,

On behalf of the Community Coalition for a Sustainable Concord (CCSC), Monument Community Partnership/Michael Chavez Center, and Bike East Bay we appreciate the opportunity to comment on the **Draft Downtown Concord Specific Plan (Draft Plan)**. The CCSC includes the following organizations: CNWS Neighborhood Alliance, East Bay Housing Organizations, Greenbelt Alliance, IBEW Local #302, Carpenters Local Union 152, Public Advocates, Save Mount Diablo, and TransForm.

As you know, our organizations and members have been active in Concord for many years, working in concert with residents and city leaders to help create a thriving sustainable, equitable city. Our work at the Concord Naval Weapons Station demonstrates the power of collaboration to overcome conflict and create award-winning plans that benefit all residents of the community.

We applaud the City of Concord for embarking on a Downtown Specific Plan. This planning process offers Concord a great opportunity to build a community near BART that will offer new choices for current residents and bring new residents to an exciting and historic downtown, with a mix of new homes, safe and walkable streets, exciting retail and cultural institutions, and good jobs. As the city struggles to compete regionally for investment, we recognize the need for a robust and visionary plan for the downtown that will unlock the city's tremendous potential. As currently drafted, the plan falls short of this goal. We therefore provide the following recommendations:

General Comments

Recommendation: Delay the adoption of the Final Draft Plan for at least one month to accommodate public comments, technical expertise, and careful policy and design review.

The City of Concord has an unprecedented opportunity to create a downtown plan that will change the course of its lagging development market. Currently, the Draft Plan contains many enhancements to Concord's General Plan that will bring more residents downtown, create safer and more accessible streets

for pedestrians and bicyclists, and create opportunities for mixed-use development. However, the Draft Plan provides little explanation or analysis of the proposed policies and implementation strategies released in 2013.

Although the anticipated adoption of the Plan is now set for May 2014, the City of Concord should use the next few months to create an adequate level of specificity and detail in its Draft Plan. There are several opportunities on the horizon to help achieve this outcome. The city's Housing Element update process will generate important policies for the downtown. This spring, the Urban Land Institute's (ULI) *Technical Assistance Panel* and the Cities for Cycling Roadshow will bring some of the Bay Area's best economists, developers, planners, and architects to Concord to build on the work completed to date and dig deeper into how the Plan can create a thriving downtown. The ULI panel, in particular, is an exceptional opportunity for the city to extract valuable insights from respected leaders in the midst of rapid regional change in the Bay Area. Therefore we strongly recommend that plan adoption be delayed to allow sufficient time for the staff and consultants to refine and improve the draft document.

Vibrant, Walkable Neighborhoods

Recommendation: Remove mention of three development alternatives in the Land Use chapter and focus entirely on the adopted "housing focus."

The Downtown Steering Committee and the City Council both reviewed the housing focus alternative that was selected by staff and the consultants. This Draft Plan should focus entirely on that strategy, giving more explanation of its market dynamics and policy framework. At the very least, we recommend more clarity about the relationship of the other alternatives, both to remove any confusion in the policy-making process and to give greater policy emphasis on the selected land use strategy.

Recommendation: Include more specific language in the Circulation chapter that advances innovative solutions for safer walking and biking. Ensure the integration of the Bicycle Master Plan into the Specific Plan's implementation strategies.

We are pleased that the Draft Plan includes several policies in support of a downtown that is safe to walk and bike, with less reliance on driving and stronger connections to regional transportation. Moreover, we are pleased that work to create more complete streets in downtown is moving forward, funded by the One Bay Area Grant (OBAG) program, and that there are plans to continue to develop this vision through the upcoming Bicycle Master Plan.

However, in order to be successful, the Draft Plan needs to outline a clearer 30-year vision of a thriving, walkable and bikable downtown, with more concrete, measurable outcomes, and outline how these outcomes will be accomplished incrementally over the life of the plan. Significant long-term infrastructure improvements to the downtown area for walking, biking, and transit should be considered a central strategy for catalyzing downtown revitalization and attracting the next generation of residents and workers.

Having more options for accessing downtown amenities by walking and biking, with safe, well-lit, comfortable routes connecting to surrounding communities, should be included as a key mechanism for lowering the demand for parking in areas within and surrounding the downtown. For instance, the pedestrian bridge that links Monument Community to downtown should be reopened, so that families can access amenities and open space safely. A mode-share goal should be established to measure progress and allow for adjustments in implementation actions over time. Every street within the plan should be explicitly considered as a bike- and ped-friendly street and efforts should be made to safely accommodate

all modes throughout Concord's downtown area. In addition, the plan should include clear commitment to integrate the completed Bicycle Master Plan into the downtown plan.

We also recommend adoption of the suggestions made in TransForm's attached memo (Appendix A) on the importance of enhanced designs and policies for safe and complete streets. As shown in their memo, traffic accidents in the downtown area pose a significant threat to people who are walking or biking. Just last week, a driver on Willow Pass fatally struck a woman. These changes are not only necessary to protect Concord's residents, but also vital to attract new residents, visitors, and workers and catalyze development in the historic core of Concord. Residents and visitors alike must have safe access to the amenities of a thriving downtown.

Recommendation: Enhance the city's parking policies to realize the maximum benefits from robust transportation demand management and deepened incentives for affordable housing.

We applaud the new parking policies in the Draft Plan and encourage staff to consider making adjustments outlined in TransForm's attached parking memo (Appendix B). In particular, we hope that Concord will deepen incentives for affordable housing beyond that of other developments when reducing parking requirements. Doing so will prevent the loss of an important tool for making affordable housing feasible.

Affordable Housing Opportunities

Recommendation: Include affordable housing unit target in the Plan and specifically link to the goals of the housing focus land use strategy.

We are still encouraged that the City of Concord chose the housing focus land use strategy. This signals a strong message to the region that Concord wants more homes near transit to create an exciting downtown, stimulate Concord's economy, and alleviate pressure on the region's open spaces. Earlier iterations of housing unit projections (Appendix C) included 850 affordable units for lower income families as part of the total phase I build-out for downtown Concord over the lifetime of the Plan. This accounted for approximately 25% of the total residential units for downtown. However, the current Plan makes no mention of these 850 units in either the Land Use chapter or the "Affordable Housing Implementation Strategy." Both sections should include this target with the appropriate graphs and affirmative policies to realize the City's commitment to a downtown with homes for people of all incomes. The 25% inclusion would be consistent with the commitment for the Concord Naval Weapons Station Reuse Plan to dedicate 25% of the housing developed on the base as affordable to lower income people including families, seniors, veterans, teachers, and people who have been homeless. We believe that Concord should aim to create a vibrant downtown with similar choices.

Recommendation: Dedicate at least two of the four city-owned parcels and other opportunity sites, including BART properties, to achieve the goal of at least 25% affordable homes in the Plan Area.

In order to achieve at least 25% of housing developed within the downtown footprint to be affordable to lower income families, the City should take advantage of publicly owned land to create affordable homes that are accessible to transit and close to new businesses and quality jobs downtown, including taking all possible actions to ensure that at least two of the four former redevelopment agency parcels get set aside for affordable developments. The Plan should also include language strongly encouraging BART to include affordable housing in the development of downtown BART property to ensure inclusive, transit-

oriented communities, with a corresponding goal of 25% of new units being affordable to lower income households. Affordable homes should be primarily developed by nonprofit housing developers because of their firm commitment to creating and maintaining high-quality, permanent affordable homes with attractive neighborhood-oriented architecture, green design, and community services. As demonstrated by the Housing Element workshops, many nonprofit developers are excited about the potential to create new homes in Concord and this Draft Plan is the perfect way to set the stage for early catalytic development that can also meet the needs of Concord's residents.

Recommendation: The Land Use section of the Draft Plan should include language that will explicitly link the Housing Element update policies to this 30-year plan.

The Housing Element update for the City of Concord is taking place concurrently with the drafting of the Draft Plan. Many of the policies in the Housing Element could greatly benefit very low- to moderate-income residents of Concord as development occurs downtown. The Draft Plan should include policy options and strategies that coincide with updates to the Housing Element as a way to increase the supply of homes for low-income residents near transit – thereby reducing single occupancy vehicle trips and GHGs– and reduce the risk of displacement of current residents.

Recommendation: Ensure the implementation of a nexus study for affordable rental housing fee that is integrated into the implementation strategy of the plan and Housing Element update.

Currently, the Draft Plan encourages the implementation of a nexus study for creating an affordable housing impact fee. Considering that there are dramatic reductions in funds for affordable housing without redevelopment, a nexus study is a crucial next step to finding solutions for providing enough affordable homes for Concord's residents. We believe this study should be a requirement, both as an implementation strategy of this Draft Plan and the Housing Element update, and the nexus study should be completed at the earliest possible date to allow fees to be adjusted in the early part of the current market cycle and plan implementation.

Recommendation: Include appropriate policies to prevent displacement of low-income residents as Downtown development progresses.

As the study of current conditions revealed, the Downtown and immediately surrounding areas are currently home to a large number of low-income renters living in homes subject to market fluctuations (i.e. non-deed-restricted). As implementation of the plan increases pedestrian safety and transit connectivity, spurs residential development and business activity, and makes Downtown Concord a more attractive place to live, there is a high likelihood that real estate values will increase and rents will go up. Because the plan encourages such market enhancing policies and activities, it is critical that it also incorporate protections for low-income residents who will otherwise end up priced-out of the housing market and displaced from their community. Anecdotal evidence shows that evictions are on the rise in neighborhoods like the Monument Community and this should be rigorously pursued to ensure the right policy protections are in place, especially for vulnerable populations. The plan should solicit input from low-income community organizations on the highest priorities for community stabilization, and take steps toward adopting policies to address those needs (local rent stabilization, just cause eviction, relocation assistance, affordable housing preservation, etc.) to ensure that Downtown Concord remains an affordable and healthy place to live for people of all income levels.

Quality Jobs for Local Residents

Recommendation: The Draft Plan should encourage development that will create a mix of good jobs that pay living wages.

It is important to consider not only the local physical environment and ecosystems, but the local economic environment and its systems as well.

With prevailing wage guarantees and contractor involvement in state certified apprenticeship programs and veteran hiring programs, community and private funding for this project will be reinvested in the economic vitality of the community. Instead of infrastructure improvements being a cost-burden borne by the local taxpayers and any profits leaving Concord, wages will recirculate within the local area and stimulate the economy for years to come.

To encourage sustainable and equitable development in Concord, the Plan should employ active policy measures to support the local skilled construction workforce, which is already concentrated in Concord. In particular, the Plan should incentivize the payment of area standard wages and benefits, use of contractors participating in proven, successful state-certified apprenticeship programs, and veterans programs like Helmets to Hardhats. Local area hire will serve to keep the commute distance low, which will result in lower greenhouse gas emissions. In addition, time away from home and family will be reduced, paying dividends in child-care, quality-of-life, and family unity.

Environmentally Sustainable Development

Recommendation: Enhance the policies for green development to include measurable mechanisms to create green jobs for Concord residents.

We applaud the city for policies to “Ensure that new development/retrofits adhere to LEED building and CalGreen standards, require LEED Silver rating for all new development, and incorporate sustainable planning/development principles into Downtown Design Guidelines.”¹ We would like to see a focus on ensuring that green jobs create partnerships between local community colleges, workforce training facilities, and green businesses. There should be a direct connection between the cost savings from sustainable design and the benefits for Concord residents from job growth in a sector that pays good wages.

Access to Open Space

Recommendation: Policies for circulation, bicycle, and pedestrian enhancements should include connection with local and regional open space and trail network.

We appreciate the attention to pocket parks and other outdoor amenities in the Draft Plan. The Draft Plan should ensure strong connections and access to the region’s unique trails, parks, and open spaces, including the new regional park planned for the CNWS, the Iron Horse Trail, and the Contra Costa Canal Trail. The plan should include a clear set of open space investment priorities to set the stage for further improvements to open space throughout the city.

¹ Downtown Concord Specific Plan, p. 10

Integration with Nearby Communities

Recommendation: Discuss the opportunities and potential impacts of downtown development on the Concord Naval Weapons Station Area Plan.

Development downtown does not occur in isolation. The revitalization of downtown and the redevelopment of the Concord Naval Weapons Station (CNWS) will both create significant changes to land use and transportation patterns in Concord over the next few decades. Policies and implementation strategies should be in place to ensure synergies between the downtown plan and CNWS Area Plan and ensure that opportunities for sustainable, equitable development exist throughout Concord.

Recommendation: Work with the Monument Community to ensure that the downtown plan benefits current and future residents and reduces the community's vulnerability to displacement.

The Monument Community is adjacent to downtown and will be affected by downtown development in the short and long-term. Residents are currently suffering from a bed bug epidemic and many struggle to find healthy places to live that they can afford. New housing downtown could support these families in their search for better homes. However, rising land values could increase the likelihood of displacement. Policies should be in place to ensure that residents of the Monument Community and independent businesses benefit as a result of development downtown. We recommend working with Monument Community Partnerships/Michael Chavez Center on strategies and policies to address the needs of current and future residents of downtown's adjacent communities.

Thank you again for the opportunity to comment on the Draft Plan. We look forward to working with you all to realize a thriving, inclusive Downtown Concord Specific Plan.

Sincerely,

Community Coalition for Sustainable Concord

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