

Plan Bay Area — Correspondence/Responses
Job-Housing Connection Scenario and Transportation Investment Strategy

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8.	4/13/2012	Ronald Munekawa, Chief of Planning	City of San Mateo
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18.	4/17/2012	Andrew Smith, Senior Planner	City of Walnut Creek
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20.	4/18/2012	Catherine Kutsuris, Director, Dept. of Conservation & Development	Contra Costa County
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22.	4/18/2012	Curtis S. Williams, Director of Planning and Community Environment	City of Palo Alto

23.	4/18/2012	Diane Henderson, Interim Planning Director	Town of San Anselmo
24.	4/18/2012	Lisa Kranz, Supervising Planner	City of Santa Rosa
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27.	4/19/2012	Jim Fraser, Mayor	Town of Tiburon
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March 2, 2012

Mayor Steve Glazer
City of Orinda
22 Orinda Way
Orinda, CA 94563

RE: Comments on Plan Bay Area

Dear Mayor Glazer:

Thank you for your letter dated February 7, 2012 to Commissioner Adrienne Tissier and Chair Mark Green concerning Plan Bay Area alternative land use scenarios.

We have passed along your comments to both the ABAG and MTC board members. Since the inception of Plan Bay Area, we have received numerous letters such as yours with detailed and thoughtful comments. ABAG and MTC staffs are formulating a more detailed joint reply to the points you raise.

A draft preferred land use strategy, which incorporates comments received on the five land use scenarios, will be discussed with the ABAG and MTC boards at a March 9, 2012 joint meeting at 9:00 am here at the Metrocenter. The Commission will review a draft transportation investment strategy in April 2012. The two boards will be asked to approve a final preferred land use and transportation strategy in May 2012, which will provide the basis for a draft Sustainable Communities Strategy (SCS) which will undergo an environmental assessment through the remainder of the calendar year. The draft SCS will be released at the end of this year, with adoption of a final SCS slated for April 2013.

As you can see, there will be ample opportunity for ongoing dialogue with our local partners on the SCS over the next several months. We appreciate your concerns and suggestions. The outcome of this major planning effort will be better thanks to your participation.

Sincerely,

Doug Kimsey
Planning Director
Metropolitan Transportation Commission

Kenneth Kirkey
Planning Director
Association of Bay Area Governments



22 orinda way • orinda • california • 94563

February 7, 2012

Ms. Adrienne J. Tissier, Chair
Metropolitan Transportation Commission
Joseph P. Bort MetroCenter
101 Eighth Street
Oakland, CA 94607-4770

Mr. Mark Green, Chair
Association of Bay Area
Governments
P.O. Box 2050
Oakland, CA 94607-4756



Subject: Comments on Alternative Scenarios for the Sustainable Communities Strategy

Dear Ms. Tissier and Mr. Green,

Thank you for the opportunity to review and comment on the alternative scenarios for the Sustainable Communities Strategy. We appreciate the challenge ABAG and MTC face in preparing a Sustainable Communities Strategy that meets the greenhouse gas reduction targets of SB 375 while respecting each community's own unique path into the future. We respectfully submit our comments and request that the preferred scenario selected reflects our input.

We have three general comments and suggestions about the alternative scenarios:

1. Without adequate funding, it is not possible for local agencies to properly study and plan for future development. State and regional agency pressure to alter historic local land use patterns heightens the importance of careful and deliberate analysis through an open and responsive public process. Orinda's recent requests for technical planning assistance through the FOCUS program were denied making it extremely challenging for Orinda to update our General Plan and meet the mandates of state law.

We suggest that, rather than establishing a system which withholds funds from cities that do not meet plans developed by the state or regional agencies without meaningful local input, incentives should be provided to assist local agencies with land use planning efforts that align with state and regional goals while taking local issues and desires into account.

2. We appreciated the opportunity to have a dialogue with ABAG and MTC staff at a meeting in the Lamorinda area when the Initial Vision Scenario was presented. Unfortunately, while ABAG and MTC held a public meeting in each Bay area county, meetings were not held locally to

present the alternative scenarios to the public, space at the meetings was limited and members of the public with concerns about the scenarios were denied the opportunity to be heard. We believe it would be very beneficial for the public, if ABAG and MTC held a local meeting in the Lamorinda area prior to selecting a preferred scenario.

3. As structured, the process puts the “cart before the horse” in that local agencies are being requested to speculate on how their General Plans may be amended to accommodate projected growth over the next 30 years before any local planning effort with meaningful public input and analysis is conducted, in conflict with the requirements of state law (Gov’t Code 65351).

With regard to the alternative scenarios as they pertain to the City of Orinda, we offer the following comments.

1. The scenarios are based on an erroneous calculation of the number of existing households in downtown Orinda. Currently, there are 227 units in our PDA (approximately 221 households), not 326 households as assumed in the alternative scenarios. The existing households are: 150 units in Orinda Senior Village at 20 Irwin Way, 52 units at 73 Brookwood Road, 22 units at 67 Brookwood Road and 3 units at 11 Moraga Way.
2. Our General Plan envisions a potential for 7,563 housing units at build-out (7,351 households assuming the average 2.8% vacancy rate during the last three decennial censuses). All three alternative scenarios are inconsistent with the Orinda General Plan in that they have allocations ranging from a total of 7,490 to 7,563 households by 2040. We request the preferred scenario selected allocate no more than a total of 7,351 households to Orinda which represents growth of 798 households over the 2010 census.
3. All three alternative scenarios allocate households to Orinda’s PDA substantially in excess of that envisioned in the Orinda General Plan and above what can realistically be expected given physical constraints, historical growth trends, property ownership, and political realities. The unrealistic numbers in the alternative scenarios in part may stem from the error in the 2010 base number for existing households in the PDA. Assuming build-out at the maximum density allowed under existing land use policies, approximately 580 housing units could be accommodated in downtown Orinda. However, given the constraints noted below, we can realistically expect development of a total of approximately 375 dwelling units, or 148 more than currently exist.

The amount of land area suitable for development in downtown is constrained by the narrow and long valley location of downtown with a

limited number of access points and thereby restricted circulation in and out of downtown, the presence of San Pablo Creek which feeds into EBMUD's San Pablo Reservoir, and steep topography in portions of the PDA and in many areas within ½ mile of the Orinda BART station. Some of these constraints to development are also assets to the community and to the region for which the City has stewardship responsibility.

Development of the PDA is further restricted by constraints imposed by PG&E transmission lines that traverse a major portion of areas of downtown that would otherwise be suitable for development, constraints imposed by the flood zone in portions of downtown, and unstable soils prone to landslides.

Other factors that the City of Orinda must take into account when considering amendments to our General Plan include the following:

- Infrastructure limitations on growth as a result of aging and narrow roads, storm drains, and water supply pipes;
- Impacts on the quality of the local schools and the ability for the schools to accommodate additional students;
- Impacts on regional open space and watershed lands; and
- Orinda's unique community character.

Thank you again for the opportunity to provide our input on the alternative scenarios and we look forward to reviewing the Preferred Scenario *before* it is adopted. If you have any questions about our comments, please feel free to contact Director of Planning, Emmanuel Ursu at (925) 253-4240 or via email at eursu@cityoforinda.org.

Sincerely,



Steve Glazer
Mayor



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May 2, 2012

Mr. Paul Price
Executive Director
NCTPA/NVTA
707 Randolph Street, Suite 100
Napa, CA 94559-2912

RE: Comments on Plan Bay Area

Dear Mr. Price:

Thank you for your correspondence dated April 9 and March 14, 2012 to Ezra Rapport concerning the Plan Bay Area Draft Preferred Scenario and Regional Housing Needs Allocation.

Your comments will be presented to ABAG and MTC board members. Since the inception of Plan Bay Area, we have received numerous letters such as yours with detailed and thoughtful comments. ABAG and MTC staffs will present recommendations on a Preferred Scenario at a joint MTC Planning and ABAG Administrative Committee meeting on May 11, 2012.

Both agencies will meet jointly again on May 17 to approve a final Preferred Scenario. This will provide the basis for a draft Sustainable Communities Strategy (SCS) which will undergo an environmental assessment through the remainder of the calendar year. The draft SCS will be released at the end of this year, with adoption of a final SCS slated for April 2013.

We appreciate your concerns and suggestions. The outcome of this major planning effort will be better thanks to your participation.

Sincerely,

A handwritten signature in black ink, appearing to read 'Doug Kimsey'.

Doug Kimsey
Planning Director
Metropolitan Transportation Commission

A handwritten signature in black ink, appearing to read 'Kenneth Kirkey'.

Kenneth Kirkey
Planning Director
Association of Bay Area Governments



March 14, 2012

Ezra Rapport
ABAG Executive Director
PO Box 2050
Oakland, CA 94604

Re: Draft Preferred Scenario and Regional Housing Needs Numbers

Dear Mr. Rapport,

The County of Napa and its four cities and one town, through a subregion, have been diligently participating in and following every step of the Regional Housing Needs Determination (RHND) methodology and Sustainable Communities Strategy (SCS) processes. We had been impressed with the SCS approach to locate most future growth in voluntary "Priority Development Areas" that incorporate jobs, housing and transit access, and distributing other future housing based on a process that also encouraged growth to be distributed in areas near transit and jobs, particularly in the regional centers and along well developed transit corridors.

Our communities were pleased that the SCS as it was being developed appeared to recognize, much better than earlier regional processes, some key State factors: particularly agricultural and open space protection that are deeply held values in Napa County. These lands are also important resources for the region.

We understood that there were transportation funding tradeoffs that rewards communities accepting more growth and were willing to accept this tradeoff in our slower growth communities.

We also realized that there were a range of SCS alternative scenarios being considered for the region, ranging from a "Core Concentration" scenario to an "Outer Bay Area" scenario that fed into the RHNA process. Last November, when the RHNA Housing Methodology Committee was suspended to allow ABAG staff to further refine these scenarios to come up with a "Preferred Scenario", the subregion anticipated its future RHNA housing allocation to be in the range of 1,600-1,800 units, with growth focused in the area's two largest cities. Since then, the Bay Area region's housing unit totals from the state have been *reduced* to 187,900 from all earlier assumptions.

We are collectively dismayed to find that the draft "Preferred Scenario" proposes large increases in housing numbers for several jurisdictions in the subregion. These results are completely contrary to the intent of the Sustainable Communities Strategy and RHNA methodology as we understand them, and as is described in the draft "Preferred Scenario" document.

Following is a comparison of the RHNA numbers using the new "Preferred Scenario" to those we've been evaluating at the Housing Methodology Committee meetings since early last year.

Comparison of 8 Year Housing Numbers for Napa County w/SCS Scenarios considered from June 2011 to the Present						
Jurisdiction	Scenarios					
	2007-2014 RHNA	Initial Vision June 2011	Focused Growth November 2011	Outer Bay Area November 2011	"Preferred" March 2012	"Preferred" Scenario HU 2010-2040
American Canyon	728	450*	424*	454*	399*	1920
Calistoga	94	26	29	30	75	50
Napa	2,024	510-650	866	970	1,229*	3,310
St. Helena	121	30	33	33	111	60
Yountville	87	19-24	39	44	55	30
Unincorporated Napa County	651	124	235	269	740	280
Total	3,705	1,159-1,344	1,626	1,800	2,607	5,560
Source: ABAG			Notes: *Includes PDAs			

There is no logical explanation for these numbers.

- While most other counties in the region have lower countywide totals, or higher totals that are at least within the range of the three alternatives previously considered, Napa may be the only county where total housing numbers are higher than any options previously considered. Why?
- We also question why the 8 year RHNA housing totals for several jurisdictions are actually higher than the 30 year housing projections on page 41 of the "Preferred Scenario"; and are confused about the relationship between the household and housing projections.

We have to believe that there are some technical problems with the "Preferred Scenario" that urgently need to be corrected.

We are extremely disappointed that the "Sustainable Communities Strategy" approach that Napa has been working hard on with the region appears to be undermined with these latest revisions within the last few months.

We look forward to ABAG staff responding as soon as possible.

Sincerely,



Paul W. Price, Executive Director
On behalf of the Napa Subregion

cc: Napa subregion



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May 2, 2012

Mr. Eric Angstadt
Director of Planning, Building and Neighborhood Preservation
City of Oakland
250 Frank H. Ogawa Plaza, Suite 3315
Oakland, CA 94612-2032

RE: Comments on Plan Bay Area

Dear Mr. Angstadt:

Thank you for your correspondence dated March 23, 2012, to us concerning Plan Bay Area.

Your comments will be presented to ABAG and MTC board members. Since the inception of Plan Bay Area, we have received numerous letters such as yours with detailed and thoughtful comments. ABAG and MTC staffs will present recommendations on a Preferred Scenario at a joint MTC Planning and ABAG Administrative Committee meeting on May 11, 2012.

Both agencies will meet jointly again on May 17 to approve a final Preferred Scenario. This will provide the basis for a draft Sustainable Communities Strategy (SCS) which will undergo an environmental assessment through the remainder of the calendar year. The draft SCS will be released at the end of this year, with adoption of a final SCS slated for April 2013.

We appreciate your concerns and suggestions. The outcome of this major planning effort will be better thanks to your participation.

Sincerely,

Doug Kimsey
Planning Director
Metropolitan Transportation Commission

Kenneth Kirkey
Planning Director
Association of Bay Area Governments

CITY OF OAKLAND



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March 23, 2012

Doug Kimsey, Planning Director
Metropolitan Transportation Commission
101 Eighth St.
Oakland, CA 94607

Ken Kirkey, Planning Director
Association of Bay Area Governments
101 Eighth St.
Oakland, CA 94607

RE: Comments from Oakland City Council on RTP/SCS

Dear Mr. Kimsey and Mr. Kirkey:

We are forwarding to you comments from the Oakland City Council on the recent phases of the Regional Transportation Plan / Sustainable Communities Strategy.

Please note that we had intended to provide you with comments from Oakland's elected officials prior to the February deadline for commenting on the Alternative Scenarios, in advance of the release of the Draft Preferred Scenario. However, due to City of Oakland business shutdown days (furloughs) and other scheduling delays, we were not able to take the SCS Alternative Scenarios presentation to Council until March 20, 2012. Therefore, please accept the following recommendations that were endorsed by the City Council at their March 20 meeting:

- 1. The City of Oakland requests that the regional agencies work with the State to ensure that the adoption of the SCS is accompanied by appropriate CEQA relief measures.**

In order to rectify the problem of unintended consequences of high growth projections on CEQA review of proposed development projects, which effectively preclude infill growth in centrally located urban areas, it is critical that changes be made to the state CEQA guidelines that will allow for simplified and expedited environmental review for infill development. The most important measures to pursue are: (1) a new statutory exemption or categorical exemption for infill projects that are consistent with the land use pattern adopted through the SCS, (2) changes to how transportation impacts are evaluated so that the methodology is less automobile-centric and less focused on traffic congestion at intersections.

- 2. The City of Oakland strongly urges the regional agencies to treat all areas equally that meet the criteria for being appropriate locations for future growth, including Planned PDAs, Growth Opportunity Areas, and "PDA-Like Areas," in terms of growth allocations in the Preferred Land Use Scenario.**

In order to ensure an equitable distribution of new households and jobs throughout the region, growth should not be allocated only to those areas that have been voluntarily designated as PDAs by local jurisdictions, as this allows some jurisdictions to “opt out” of taking on their fair share of the region’s future housing need.

3. The City of Oakland requests that the regional agencies establish a direct and binding relationship between growth allocations and funding.

In order for the SCS to be successful, there must be a guarantee that those jurisdictions that agree to take on higher levels of growth will receive a larger share of funding for transportation and infrastructure improvements, affordable housing, and other public expenditures that are necessary to support growth. The current OneBayArea Grant proposal and the formula for distributing funding to counties is a step in the right direction, but the City of Oakland requests that a stronger and more direct link be established between the growth allocations and disbursement of funding. Also, the OneBayArea grant program represents only about 3% of the regional discretionary funds. The City of Oakland requests that a greater proportion of these funds be linked to local control.

4. The City of Oakland encourages the regional agencies to develop tools and strategies for guiding job growth to central, transit-accessible locations.

At present there are relatively few tools available to redirect job growth within the region. We believe that a regional dialogue is needed on how to incentivize job growth in locations with good access to the regional transit network, as opposed to the past trend of large employers choosing to locate in suburban areas around the region’s periphery. We urge the regional agencies to work in collaboration with cities to identify policy changes that will help achieve the distribution of job growth that is set forth in the SCS Preferred Scenario.

Thank you again for your work on the Regional Transportation Plan and Sustainable Communities Strategy.

Sincerely,



Eric Angstadt
Director of Planning, Building and Neighborhood Preservation

Cc: Athena Ullah, Association of Bay Area Governments



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May 2, 2012

Mayor John Chiang
City of Piedmont
120 Vista Avenue
Piedmont, CA 94611

RE: Comments on Plan Bay Area

Dear Mayor Chiang:

Thank you for your correspondence dated 4/6/2012 to our agencies concerning the Plan Bay Area Jobs-Housing Scenario and Transportation Investment Strategy.

Your comments will be presented to ABAG and MTC board members. Since the inception of Plan Bay Area, we have received numerous letters such as yours with detailed and thoughtful comments. ABAG and MTC staffs will present recommendations on a Preferred Scenario at a joint MTC Planning and ABAG Administrative Committee meeting on May 11, 2012.

Both agencies will meet jointly again on May 17 to approve a final Preferred Scenario. This will provide the basis for a draft Sustainable Communities Strategy (SCS) which will undergo an environmental assessment through the remainder of the calendar year. The draft SCS will be released at the end of this year, with adoption of a final SCS slated for April 2013.

We appreciate your concerns and suggestions. The outcome of this major planning effort will be better thanks to your participation.

Sincerely,

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Doug Kimsey
Planning Director
Metropolitan Transportation Commission

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Kenneth Kirkey
Planning Director
Association of Bay Area Governments

CITY OF PIEDMONT
CALIFORNIA



April 6, 2012

Mark Luce, President, Board of Directors
Association of Bay Area Governments
PO Box 2050
Oakland, CA 94604-2050

Adrienne Tessier, Chair
Metropolitan Transportation Commission
101 Eighth Street
Oakland, CA 94607

**RE: One Bay Area Sustainable Communities Strategy Draft Preferred
Scenario and 2014-2022 RHNA**

Dear Mr. Luce and Ms. Tessier:

The City of Piedmont has reviewed the Sustainable Communities Strategy (SCS) Draft Preferred Scenario, Preliminary Regional Housing Needs Allocation Methodology, and OneBayArea Grant released on March 9, 2012 and now under consideration by the joint partnership of ABAG and MTC. We understand that One Bay Area will be taking action on all three programs in May, and appreciate another opportunity to provide comments on this important regional planning process.

The Piedmont City Council reviewed the Draft Preferred Scenario and the Draft 2014-2022 RHNA documents at the March 19, 2012 and April 2, 2012 City Council meetings, and wish to provide the following comments on both documents.

(SCS) Draft Preferred Scenario

The City of Piedmont appreciates the assistance of ABAG Planning Director Ken Kirkey, who met with City staff to discuss the City's concerns outlined in the City's January 20th letter, and we wish to convey our sincere appreciation of the consideration of the ABAG and MTC Boards to the City's concerns, resulting in the adjustment from 627 new households by 2035 projected under the Focused Growth, Constrained Core and Outward Growth Scenarios, to 60 new households under the Draft Preferred Scenario. While the projection is still higher than

historical growth trends, it is closer to the 50 units optimistically anticipated in the City's General Plan. However, we have serious concerns about the job growth forecast of 480 new jobs, which we believe is unattainable, and are submitting these comments for your consideration.

As previously mentioned, but critical to this discussion, is the fact that Piedmont is a very small, landlocked residential city, bordered on all sides by Oakland. As noted in our General Plan, the entire City is 933 acres and has been built out since 1960. The City has just 3.7 acres of commercial property, which is fully developed and all in active use. There is no industrial land and there are no vacant public or institutional sites suitable for redevelopment. There is no Priority Development Area (PDA), as there are no development opportunities of sufficient size to warrant this designation. According to Projections 2009, the City lost jobs between 2000 and 2010 and is forecast to add just 50 jobs between 2010 and 2035. The City has used ABAG's forecasts in its own planning and infrastructure decisions and would not be equipped to accommodate a larger increase in employment.

The only two employers of significance in the City are the Piedmont Unified School District and the City of Piedmont. It is highly unlikely that either institution will add jobs between now and 2035, and more likely that both of these institutions will lose jobs. The only job growth in the last two decades has occurred in home-based businesses, and it is expected that this trend will continue in a modest way. The City supports home-based businesses because they provide an important revenue source through Business Licenses and help the City meet its Climate Action Plan goal to reduce greenhouse gas emissions through reduced commuter trips. It is important to note that under our Code, Piedmont's home-based businesses may not include employees who live outside the residence, so there is no possibility that an increase in home-based businesses will create a demand for housing: the housing already exists.

As mentioned in our January 20, 2012 letter, Piedmont is also a "housing reservoir," with nearly twice as many housing units as jobs. The Piedmont General Plan anticipates a net increase of only 50 jobs in the next 30 years, which is consistent with historic trends and the absence of any land where future employment might locate. This employment projection is also generally consistent with ABAG Projections 2009, ABAG Projections 2007, ABAG Projections 2005, and other biennial ABAG forecasts going back many years. Given ABAG's historic forecasts for Piedmont and its concurrence and acknowledgment that the City has very limited job potential, we were alarmed to see the Draft Preferred Scenario showing 480¹ additional jobs in the city between 2010 and 2040. Such an increase in employment could not be achieved without

¹ It is noted that the Employment Distribution by Jurisdiction in the March 9, 2012 Jobs-Housing Connection document appears to have a math error: for Piedmont, it shows an employment increase from 1,930 to 2,410 jobs equaling 490 new jobs, when it should be 480 jobs.

converting single family residential areas to commercial use. Again, the only realistic opportunity for job increases is through more home-based businesses: jobs that do not need housing.

Preliminary Regional Housing Needs Allocation Methodology

With the recent release of the Draft Housing Need Allocation analysis, we are also alarmed to see that the City has been assigned 80 new housing units between 2014 and 2022. We find the SCS projection of 60 new households (presumably in need of housing units) within 28 years compared to the RHNA need to plan for 80 new units within 8 years to be inconsistent and confusing. It is neither reasonable nor rational that a City should be expected to plan for more housing in the next eight years than it is expected to accommodate in the next 28 years.

The City's General Plan reflects the constrained land supply and anticipates approximately 50 new housing units by 2035. The City's expectation is that most of this gain will be from second unit construction, due to topographic and access constraints on the few remaining vacant lots. Adding 60 or 80 housing units as suggested by either projection could not be accomplished without the demolition of owner-occupied single family homes, or the development of housing on our parks and school properties. This would not be consistent with our General Plan, nor would it be consistent with SB 375 or the principles underpinning ABAG's sustainability planning. Piedmont is already developed at a much higher density than most cities in the Bay Area, with 6,265 persons per square mile.

The City has worked very hard to encourage and permit the 40 units (34 of which must be at levels affordable to very low, low, and moderate income households) under our current RHNA (2007 - 2014). As evidence, of the 17 new second units approved since 2007, 12 were affordable to very low income families. Moreover, on March 19, 2012, the City Council approved further changes to our second unit code to encourage more second units at affordable levels in compliance with our Housing Element. Even with these changes, meeting the RHNA assignment is a significant challenge. Doubling that assignment as proposed under the Draft 2014-2022 RHNA, will once again place the City in the untenable position of not being able to develop a compliant Housing Element, potentially subjecting us to lawsuits and ineligibility for grants and other funds which would benefit those most in need of housing assistance.

As noted in our January 20, 2012 letter, even if the City were to rezone developed single family neighborhoods for higher density housing, it is extremely unlikely that such development would occur without the legal and financial tools of redevelopment. Even in Piedmont's multi-family zone (which has been in place for over 80 years) almost all of the single-family residences have remained in single-family use because of market economics. The lot sizes, parcel ownership, aging infrastructure, and already high densities make additional high density housing infeasible for even a fraction of the units projected in the Draft Scenario.

We wish to reiterate our understanding that One Bay Area has a very difficult task of developing a regional land use approach that meets the objectives of AB 32 and SB 375. We sincerely appreciate the considerable efforts of the ABAG and MTC Boards and staff tasked with evaluating multiple scenarios as a means of finding the scenario that most effectively achieves the regional goal. However, we do not believe a model designed for communities with large areas available for reuse and intensification, and extensive inventories of underutilized industrial and commercial sites, will ever be able to accommodate the fixed, single-family residential, built-out nature of Piedmont.

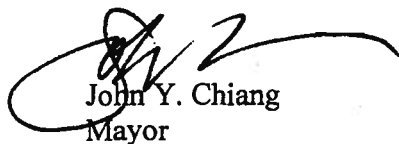
We recognize our obligation to help solve regional problems, and have actively undertaken programs to proactively address them through our 2010 Climate Action Plan, our recycling and composting program, and our second unit program that is meeting - and in some categories exceeding - our goals of providing affordable housing. But we must strenuously object to the jobs growth projection under the SCS Draft Preferred Scenario, and Draft Regional Housing Needs Allocation for 2014-2022.

We respectfully submit these comments, and ask that they be seriously considered. We encourage ABAG and MTC to arrive at a modified Preferred Scenario that addresses the unique built-out circumstance of Piedmont. We are committed to working collaboratively with ABAG and member jurisdictions on regional matters, including affordable housing, but request that our physical constraints be recognized under the SCS Preferred Scenario and 2014-2022 RHNA. Without such an exception, we will be in the untenable position of being out of compliance with our Housing Element, with no redress.

We strongly urge you to continue to acknowledge Piedmont's extremely limited land supply and environmental constraints and make appropriate adjustments to the allocation methodology used in the SCS and RHNA processes.

Sincerely,

CITY OF PIEDMONT



John Y. Chiang
Mayor

Cc: Ezra Rappaport, Executive Director, ABAG
Steve Heminger, Executive Director, MTC
Beth Walukas, Deputy Director of Planning, ACTC



METROPOLITAN
TRANSPORTATION
COMMISSION



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May 2, 2012

Mr. Paul Price
Executive Director
NCTPA/NVTA
707 Randolph Street, Suite 100
Napa, CA 94559-2912

RE: Comments on Plan Bay Area

Dear Mr. Price:

Thank you for your correspondence dated April 9 and March 14, 2012 to Ezra Rapport concerning the Plan Bay Area Draft Preferred Scenario and Regional Housing Needs Allocation.

Your comments will be presented to ABAG and MTC board members. Since the inception of Plan Bay Area, we have received numerous letters such as yours with detailed and thoughtful comments. ABAG and MTC staffs will present recommendations on a Preferred Scenario at a joint MTC Planning and ABAG Administrative Committee meeting on May 11, 2012.

Both agencies will meet jointly again on May 17 to approve a final Preferred Scenario. This will provide the basis for a draft Sustainable Communities Strategy (SCS) which will undergo an environmental assessment through the remainder of the calendar year. The draft SCS will be released at the end of this year, with adoption of a final SCS slated for April 2013.

We appreciate your concerns and suggestions. The outcome of this major planning effort will be better thanks to your participation.

Sincerely,

A handwritten signature in black ink, appearing to read 'Doug Kimsey'.

Doug Kimsey
Planning Director
Metropolitan Transportation Commission

A handwritten signature in black ink, appearing to read 'Kenneth Kirkey'.

Kenneth Kirkey
Planning Director
Association of Bay Area Governments



707 Randolph Street, Suite 100 • Napa, CA 94559-2912
 Tel: (707) 259-8631
 Fax: (707) 259-8638

April 9, 2012

Ezra Rapport
 ABAG Executive Director
 P.O. Box 2050
 Oakland, CA 94604

Re: Draft Preferred Scenario and Regional Housing Needs Allocation

Dear Mr. Rapport,

The Napa subregion's technical group has met to discuss the latest information relating to the Preferred Scenario and the Regional Housing Needs methodology. We appreciate your staff's efforts to keep us informed of ABAG's ongoing technical work, and in letting us know that the error discovered relating to Unincorporated County numbers is being fixed, substantially reducing that jurisdiction's numbers. We do continue to have major concerns about how the Preferred Scenario inputs have affected the subregion's overall RHNA allocation, as well as those of our other individual jurisdictions. We understand that technical adjustments are being made to vacancy rates, among other inputs, to reduce these numbers to be more in line with the SCS scenario alternatives ranging from 1,600-1,800 units we reviewed last fall.

Subregional representatives also wanted to bring to your attention a comparison of the Napa subregion's household formation growth totals with the RHNA allocation (from the 3/8/12 ABAG Draft Preferred Scenario's RHNA handout). We found that the Napa subregion inexplicably has a much higher RHNA allocation than its projected household growth, much more than any other county on a percentage basis. We are only one of two counties whose RHNA totals were *higher* than its household growth and our increase matched San Francisco's—this at a time when the Housing Need allocated to the region went down!

	Household Formation Growth	RHNA	Difference
Alameda	57,010	43,218	-14,000
Contra Costa	33,986	21,973	-12,000
Marin	4,784	3,391	-1,400
Napa	1,735	2,607	+900
SF	24,026	24,944	+900
San Mateo	25,772	17,101	-8,700
Santa Clara	83,867	52,348	-31,500
Solano	11,675	10,080	-1,600
Sonoma	15,161	12,328	-2,800
Regionwide	288,016	187,990	-100,000

We have long understood the SCS objectives of providing for housing in urban infill areas near transit and jobs, particularly in the regional centers along well-developed transit corridors, and protecting regional assets including agriculture and open space. Thus, it does not make sense that the furthest outlying, most rural and least transit accessible county would receive far more housing units than its household growth projections.

A further concern is that the ABAG Executive Board decided in March to withhold approving one of our subregional jurisdiction's proposed PDA applications for at least three months. This city not only meets the rural place type criteria created by ABAG, but is also pictured in ABAG's application guidelines as a prototype rural town center. ABAG staff had encouraged the city to submit a PDA application, noting that because it contains planned "PDA-like places" various scenario inputs had already included a higher allocation for the city. Given this, after much consideration the city did decide to apply for its PDAs to become eligible only to have the application be held up.

Through an online survey, ABAG has asked for further information and feedback from local jurisdictions on the Jobs-Housing Connection Scenario and its housing and jobs growth distribution. Our earlier letter of March 14, 2012 pointed out how variable our subregion's allocations have been and some specific technical problems with the "Preferred Scenario" that we understand are being worked on. This letter supplements those comments. It is difficult for us to comment further, to support the housing methodology or to assist ABAG with outreach efforts on the Preferred Scenario in Napa County until some of the technical issues are fixed, and because the PDA status in one of the subregion's cities is still pending.

Sincerely,



Paul W. Price
Executive Director
On behalf of the Napa Subregion

cc: Napa subregion

BayArea Plan

Bay Area Business Coalition
(See Distribution Below)

April 24, 2012

Dear Gentilepersons:

Thank you for your April 11, 2012 letter to our respective boards regarding your questions and request for additional information about the Sustainable Communities Strategy (Plan Bay Area).

First, we would like to express our appreciation for the Business Coalition's continued participation in Plan Bay Area and the value you add to the planning process. Second, we agree that officials, stakeholders and the public should be given adequate opportunity to participate in the Plan Bay Area process and as you know we have done extensive outreach to all stakeholders since we started the process over 2 years ago.

We also appreciate the opportunity to have held discussions with the Business Coalition to address several of your Plan Bay Area-related questions. As your letter notes, we met in February 2012 to discuss several questions you had submitted about the process, housing/employment forecasts, transportation funding, and regulatory issues. At that time we committed to providing written responses to your questions. These are provided in Attachment A. We note that most of the questions attached to your April 11, 2012 letter are the same as those discussed at our February 2012 meeting. Please see Attachment B for a cross reference between our responses and your April letter.

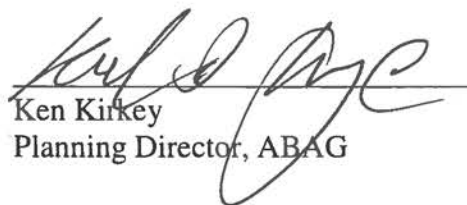
In addition to the responses to your questions, we committed to providing additional data derived from several of our past analyses. You'll note a list of documents that contains additional information and analysis that you requested. These documents are too voluminous to print so we have posted at the address on Attachment C (see: http://www.onebayarea.org/plan_bay_area/land_use_data.htm). The rest is still being compiled and will be sent under separate cover.

We look forward to further collaboration with the Business Coalition on Plan Bay Area and the economic impact analysis that we discussed with you at our meeting in February.

If you have further questions on our responses or data, please do not hesitate to contact Ken Kirkey at kennethk@abag.ca.gov or Doug Kimsey at dkimsey@mtc.ca.gov.



Steve Heminger
Executive Director, MTC



Ken Kirkey
Planning Director, ABAG

Distribution:

Jim Wunderman, Bay Area Council
John Coleman, Bay Planning Coalition
Paul Campos, BIA Bay Area
Linda Best, Contra Costa Council
Karen Engel, East Bay EDA
Gregory McConnell, Jobs & Housing Coalition
Cynthia Murray, North Bay Leadership Council
Rosanne Foust, SAMCEDA
Sandy Person, Solano EDC

cc: Ann Flemer, MTC
Doug Kimsey, MTC
Ken Kirkey, ABAG

Attachment A

BAY AREA BUSINESS COALITION

Questions on Sustainable Communities Strategy

February 2012

Process

1. What is the current status of the SCS scenario process?

The Alternative Scenarios have been evaluated and the ABAG Executive Board released the Preferred Scenario, Jobs-Housing Connection on March 15. MTC will release the Transportation Investment Strategy on April 13. ABAG and MTC will seek approval of a preferred SCS scenario on May 17, 2012.

2. When will the preferred scenario be identified?

See above.

3. What body (ies) will have an opportunity to review and comment on it before it is adopted?

All stakeholders and agencies will have this opportunity. In addition, MTC and ABAG will review the recommendations with the Regional Agency Working Group (RAWG), MTC's Policy Advisory Council, Partnership Technical Advisory Committee/Board and Joint Policy Committee. Presentations will also be made to the BAAQMD (Air District) and Bay Conservation and Development Commission (BCDC). Other presentations will be made upon request, subject to scheduling.

4. How will it be adopted? By what body (ies)?

MTC and ABAG will adopt the preferred SCS by resolution.

5. Will it be a "draft" preferred scenario that is adopted?

In May 2012, MTC and ABAG will be adopting a final preferred SCS scenario.

6. Is there a possibility of additional scenarios being added for consideration?

MTC and ABAG will adopt one preferred scenario. We will be conducting a program environmental impact report (EIR) later this year that by law requires us to evaluate alternatives to the preferred SCS scenario.

7. What is the process/timeline that will follow adoption of the (draft) preferred scenario?

March 15, 2012: release preferred land use scenario

April 13, 2012: release transportation investment strategy

May 11, 2012: seek MTC Planning/ABAG Administrative Committee approval of draft preferred SCS scenario.

May 17, 2012: seek MTC/ABAG adoption of a final preferred SCS scenario.

June – December, 2012: develop/release draft SCS/program EIR
 January – April 2013: develop/adopt final SCS/program EIR

Comments on the scenario will take place in many locations around the region between May 2012 and early 2013. We are hoping that City Councils will provide comments during this period.

Scenario Results

8. None of the 5 alternative scenarios comes close to meeting the 2035 target of 15% per capita GHG reduction. Please explain how the agencies plan to bridge the gap.

We are still evaluating how to achieve the ARB 2035 target for the Bay Area.

9. Less than one year ago, agency staff presented an analysis of how "Current Regional Plans" performed. The analysis showed that Current Regional Plans would reduce GHG by 10% by 2035 (attached). Please explain how Current Regional Plans performed better than Core Concentration and Focused Growth despite the fact the latter had the benefit of almost \$40 billion in additional assumed transit improvements for which there is no funding.

Current Regional Plans used different regional demographic control totals; it also used an earlier version of our new travel model.

10. Please talk a little bit about modeling. Are you using the same/similar modeling tools/protocols as did SANDAG and SCAG? If not, why not? What are the critical differences?

We are using the latest generation travel model (unknown as "tour-based") that tends to be more precise in measuring types of trips than SCAG and SANDAG. It is our understanding that all the larger regional agencies are moving toward tour-based models.

ABAG is using an iterative method with local government planners to update and refine its projections. In addition, ABAG and MTC staffs are developing an UrbanSim model designed by UC Berkeley. UrbanSim is a software based system that integrates land use; transportation and economic conditions.

11. CARB recently determined that SANDAG's SCS will meet the region's GHG targets. In doing so, CARB concurred with SANDAG's projection that implementing a suite of policies such as smart driving education campaigns, telecommuting, and vanpool incentives, would account for 40% of the region's per capita GHG reduction by 2035 (5% of the total 13% reduction) even though SANDAG's computer modeling did not validate the results of these policies. CARB allowed SANDAG to

justify the GHG efficacy of these policies by using "off-model tools" (research papers and empirical studies in the literature). The agencies have suggested similar policies in the Bay Area could reduce GHG by 6.5%. Have you consulted with CARB to confirm that it will give the Bay Area similar credit? If more money is devoted to these policies than shown at the Dec. 9, 2011 Planning Committee/Admin Committee meeting, can we project increased GHG reduction through these policies?

All three regional agencies that have released their SCSs have taken credit for similar policy measures that cannot be accurately measured in the travel forecast model but there is empirical data that they do reduce GHG emissions. We likely will follow suit with similar measures as part of our SCS, and will determine whether the measures can reduce GHGs further if more funding is provided.

12. Throughout the alternative scenario process, the public and stakeholders were told that of the 5 scenarios being considered, 3 were reasonable (in compliance with federal planning requirements) and financially constrained (in compliance with federal constrained funding requirements). When the modeling results were publicly revealed in late 2011, agency staff disclosed that 2 of the 3 scenarios ("Constrained Core Concentration" and "Focused Growth") were not financially constrained and their GHG results reflected expenditure of almost \$40 billion in transit improvements for which there is no funding. The only 1 of the 3 that was modeled with a constrained transportation network was "Outward Growth". Why did the agencies model CCC and FG with an unconstrained transit network after describing them throughout the process as financially constrained? Why was the Outward Growth scenario alone modeled with a constrained network?

The five land use/transportation scenarios were designed to present a broad range of impacts. You'll note from the December 9, 2011 presentation that you reference that there is relatively small variation among the scenarios evaluated. This is primarily due to the extensive development/transportation system already in place in the Bay Area.

Scenario Issues

13. To date, the agencies have not released a "trend" land use scenario. Disparate stakeholder groups specifically requested a trend scenario be evaluated last summer. Why haven't the agencies modeled a trend/baseline scenario? Do they plan to do so?

We are preparing a No Project option as required for the program EIR that will reflect current regional plan development capacity.

14. According to agency staff, the MTC Planning and ABAG Administrative Committees in April 2011 gave the following direction for

creating the alternative scenarios: "Take a realistic, pragmatic approach when defining alternative scenarios." Do you think the 3 scenarios are realistic and pragmatic?

Yes. See #12 response.

15. In response to the direction, staff proposed creating "distinctly different combinations of land use growth patterns, transportation investments, and supportive policies." Do you think this has been done? (see attached SCAG scenario summaries).

Yes. See #12 response. The scenarios presented different allocations of PDA growth. To compare them to each other, the transportation investments and policies were held constant.

16. The agencies have declared the 3 scenarios are reasonable and in compliance with federal planning requirements. Do you agree with this conclusion?

Yes. See #12 response.

17. On what basis have the agencies determined the 3 scenarios comply with federal reasonableness requirements? Has a formal analysis been prepared?

There are no federal or state planning requirements that compel us to evaluate a set number of scenarios or alternatives.

18. The Bay Area is a nonattainment area and as part of the Clean Air Act conformity process must consult with federal agencies about the reasonableness of the land use projections in the RTP/SCS. Please provide a description of that process, including what agencies will be involved, the names of the relevant officials, their contact information, and a timeline for all meetings and consultations with them.

MTC's Resolution No. 3757 outlines procedures to be undertaken by the MTC, U.S. Environmental Protection Agency (EPA), California Department of Transportation (Caltrans), FHWA, FTA, State and local air agencies and, before making transportation conformity determinations on the RTP and Transportation Improvement Program (TIP) (see attached email list). Interagency consultation on transportation conformity and related air quality planning is facilitated through MTC's Air Quality Conformity Task Force. The Task Force meets monthly.

19. The Plan Bay Area Process & Timeline flow chart (attached) identifies as Step 5 "Assess land use options (ABAG)" and "Compare options to existing local policies (ABAG)". It then describes Step 6 as "Identify preferred land use and investment strategy" and "Approve preferred scenario". Has ABAG conducted this comparison of the 3 alternative scenarios against "existing local

policies"? What is included in "existing local policies" ?

Yes. "Existing local policies" is mostly what's permitted by local plans. ABAG also worked very closely with local agency staff to reconcile PDA housing and job capacity. ABAG communicates with Planning Directors from the jurisdictions in an iterative process related to that jurisdiction's land use policies. In some cases, ABAG looks beyond current land use policies in its long term projections, but checks these assumptions for reasonableness with local planning staff.

20. If not addressed in the question above, have the 3 alternative scenarios been specifically compared to existing General Plans for both cities and counties included in the planning area?

While ABAG did not complete an explicit comparison among the 3 scenarios and general plans, there were extensive discussions with local agency staff as described in #20.

21. The Sept. 1, 2011 Memo "Alternative Land Use Scenarios" indicates that the 3 scenarios "do not yet include input from local jurisdictions or analysis of land constraints, industrial cluster support, or public and private investments. This input and analysis will be essential to develop the employment distribution for the Preferred Scenario." Has this input and analysis been conducted?

Yes. See #19 response.

22. Do you consider the projected land use pattern in T2035 to be a "sprawl" land use pattern? No.

23. At regional agency discussions it seems to be taken as a given that current land use policies of cities and counties in the region ("business as usual") are generally bad and fairly characterized as promoting "sprawl." Do you consider a significant number of existing Bay Area city or county general plans to promote "sprawl" in their land use policies for the future? If yes, what prominent general plans fit that description?

No. Many recent general plan updates reflect more focused growth policies that were not evident in plans developed over the past couple of RTPs.

24. How does this perspective align with the position that the Bay Area region is unable to meet the CARB emission reductions because its land use and transportation policies had already produced lower per capita GHG emissions and were on a trajectory to further lessen emissions (relative to SCAG and SANDAG)?

As a slower growth region it admittedly makes our task somewhat more difficult.

25. None of the alternative scenarios accommodates 100% of the region's forecasted housing need. Does SB 375 require the SCS to identify sufficient areas for housing to meet the region's entire projected housing need so that if the housing were built there would be no in commuting from other regions? if not, do you nonetheless believe the adopted SCS should do so as a discretionary policy matter?

The preferred land use scenario does not forecast any net new commuting into the Bay Area. We believe this is reasonable given that we will not likely be able to induce those already in-commuting to the Bay Area given the large housing price differential with the Central Valley. The alternative scenarios were created with estimates and not an official forecast of the region. The draft forecast is now complete and demonstrates that 100% of the region's housing need can be met with 660,000 units by 2040.

26. The materials the agencies regularly distribute describing the PDA place types do not mention densities. The place types come from the 2009 Station Area Planning Manual. The manual does identify densities for each place type. The densities range from 20/acre to 300/acre. The three "reasonable" scenarios assume between 67-79%

- a. Does this mean that the agencies expect that circa 70% of the new population through 2040 will live in new development that is at least 20 units/acre?*
- b. Will the SCS specify density projections within respective PDAs?*
- c. How do projections for housing units within PDAs compare to existing General Plan designations for those PDAs?*

a) Yes, by 2040, 70% of the new households will be living in higher density development. The units being produced in the PDAs will meet or exceed 20 units per acre. There is a shortage of this type of housing in the Bay Area, and the demographics indicate a substantial demand for more of this type of unit. The PDA place type and densities are generally consistent with the existing General Plan designations.

b) Yes.

c) That data are still being developed. GP data do not uniformly go out 25 years; our new land use model under development will provide us with that information based on policy and market information.

27. How does each scenario treat the remaining 30% of new units not projected to be accommodated in PDAs? Is the projection that they will live in similar place types with similar densities?

Generally speaking, growth outside the PDAs is assumed to be single family residential or townhouses. ABAG has not yet made specific projections with respect to these densities outside the PDAs.

Transportation

28. Regarding transportation investments, do you support the "compelling case" proposed policy that prohibits a project from being included in the RTP if it has a moderately negative impact on the Performance Targets-no matter how well the project scores on a cost benefit.

We have established protocols for compelling cases. See:
[http://apps.mtc.ca.gov/meeting_packet_documents/agenda_1823/Agenda item 2 Guidance for Applying Proj. Perf. Assessment to Plan Bay Area Investments.pdf](http://apps.mtc.ca.gov/meeting_packet_documents/agenda_1823/Agenda_item_2_Guidance_for_Applying_Proj._Perf._Assessment_to_Plan_Bay_Area_Investments.pdf)

29. Under each scenario, how would the share of total future transportation spending differ for each county as compared to the current RTP?

We didn't figure in county shares; however we will do so for the preferred investment strategy.

30. The Bay Area currently spends 2% of total transportation funding on the category Road Expansion: HOV, HOT, ML; and 1% on Road Expansion: General Purpose. The corresponding figures for the other regions are SCAG (20% / 5%), SANDAG (16% / 23%), SACOG (3% / 13%) (see attached document). Do you think the SCS should have as a goal reducing the future share in the Bay Area to below the 2% and 1% figures?

We don't aim for a specific share. Given that our current plan dedicates 80% of funding to maintenance and operations, we are more interested in strategically expanding the system with those projects that perform the best against to our performance measures.

Workshops

31. What are the main observations/conclusions you take away from the series of scenario workshops?

That there are diverse opinions on how we should grow and what role regional government should play.

32. The workshops asked participants (in person and online) to state their preference for how the region should accommodate projected growth. The alternatives are described as:

- A. Allow new housing, offices, and shops to be built in the centers of cities and town near public transit.*
- B. Build more affordable housing near public transit for residents*

without cars who depend on public transit while presenting the character of single-family residential neighborhoods.

- C. Build more affordable housing in existing communities that already have a strong job base.*

Are these descriptions proxies for the 3 identified scenarios? If so, what description corresponds to what scenario? Are the results of this question going to be presented by the agencies as the measure of public support for the scenarios.

- a) The descriptions are not proxies for these scenarios but do describe a direction that we need to put more of the projected regional housing and job growth in established communities with good transit service.
- b) The same questions were asked as part of our telephone poll, focus groups and community based workshops. The results of these were presented at the April 13, 2012 joint MTC Planning/ABAG Administrative Committee

33. In the contest of defining “complete communities”, the workshop materials told participants (in person and online) that “New development (housing) and transportation investments need to be carefully designed to maximize benefits for residents.” At the San Francisco workshop, agency staff confirmed that this referred to existing residents. As examples of benefits, the materials identified increased parks and open space through development impact fees and better schools through school impact fees. Do you agree that creation of complete communities depends fundamentally on requiring new housing projects to provide maximum benefits to existing residents?

The question’s intent was mainly to gauge respondent’s opinion to what extent new development should mitigate its impacts. It does not require the new housing projects to provide these benefits entirely, but they should contribute to the benefits. Neighborhood-level plans associated with PDAs identify issues associated with the neighborhood and ways to address them. New housing units alone cannot bear the financial burden of improving these areas. That decision ultimately rests with the cities and counties, not the regional agencies.

OBAG

34. What do you think are some of the key drivers in a community’s decision to approve housing? How might programs like the One Bay Area Grant help influence that decision?

The drivers likely vary by geography. In the inland areas of the region it may be more of an economic necessity where the financial viability of a city depends on its ability to generate additional revenue from new housing. For the more urban areas, the new housing may be a way to rebuild older

communities to make them more attractive and more desirable for businesses and services to locate.

OBAG is intended to reward those jurisdictions that are agreeing to take on more of the growth and have done the appropriate planning to take on this growth. Our experience has shown that neighborhood planning and community engagement early in the process is far better than presenting growth by individual projects. The OBAG helps support neighborhood planning.

35. Do you have any thoughts on how OBAG (maybe in future iterations) could be used to incentivize job density?

ABAG staff is considering public policy to promoting job centers in the region. More work needs to be done to articulate how these centers would be defined and is something we could consider in the next OBAG funding cycle to the extent that OBAG helps incentivize employment centers or mixed use neighborhoods, it will assist employers who want to locate in that area.

36. The Business Coalition's comment letter on the initial OBAG proposal suggested that examination of jurisdictions' efforts to identify and remove or mitigate policies within its control that constrain housing development should be part of the criteria for considering grant applications. The revised OBAG proposal does not include this proposal. We believe it is very important that this issue be included in some way in the OBAG program. At the very least it should be a part of the application process if only as an information item that can be tracked over time. Will you support including this concept in the final OBAG program?

The OBAG guidance is currently being revised based on all comments received. A revised proposal will be distributed in April 2012.

37. Once the RTP/SCS is adopted, what do you envision will be the process and specific factors used to determine whether an individual proposed project is consistent with the SCS? What agency do you envision making the consistency determination: the local lead agency (city/county) or ABAG/MTC?

The consistency determination process is still under consideration by MTC and ABAG.

38. Have you had any conversations with the Attorney General's office with regard to the RTP/SCS and the alternative scenarios?

Not at this time, but we intend to.

39. Have you had any conversations with CARB staff about the alternative scenarios?

Nothing substantive, but they have been following our process.

40. What lessons, if any, have you learned from the MPOs proceeding before the Bay Area in developing and adopting their RTP/SCSs?

Mainly that we are all pursuing somewhat similar processes.

41. Have you reviewed the EIR's prepared for the SANDAG and SCAG RTP/SCSs? How do you anticipate the Bay Area's approach to compare to theirs?

Yes. We are still developing our own approach to the program EIR.

42. Is the Bay Area adopting an Alternative Planning Strategy a reasonably foreseeable outcome? What are the benefits/drawbacks of such an outcome?

Our intent is to meet the GHG target with the SCS. The main benefit will be that we can meet the GHG target with reasonable land use and transportation assumptions allowing local agencies more flexibility when taking advantage of SB 375 CEQA streamlining provisions.

43. What role will the adopted SCS have on implementing climate change?

The SCS, by definition, will reduce GHG emissions per capita by at least 15% in 2035 compared to 2005.

Requests for Additional Information and Analysis

1. For the following land use scenarios: IVS; Core Concentration I; Core Concentration II; Focused Growth; Outward Growth; Current Regional Plans; Current General Plans; T-2035 Most Ambitious (one of the alternatives studied for T2035*) using the same overall jobs and housing numbers and the same level of transportation funding and other assumptions that will be used for the Preferred Scenario: The land use scenarios listed above were developed between 2008 and 2012 and utilized different assumptions and control totals. The Sustainable Communities Strategy development process has been iterative involving a great deal of input from many sources and analysis by staff and expert consultants. The results of prior scenarios have been utilized in the development of subsequent scenarios. The Current Regional Plans scenario used different regional demographic control totals and an earlier version of our travel model. The T2035 land-use forecast utilized different regional control totals and our prior travel model. Information pertaining to the SCS related scenarios described above is available at:
http://www.onebayarea.org/plan_bay_area/land_use.htm

- The number of total new housing units for the region
- The average overall residential density for the projected new housing development in the region
- The total number of new jobs in the region
- The average overall job density for the projected new jobs in the region
- The number and % of the region's total new housing units that will be multifamily
- The number and % of the region's total new housing units that will be single-family
- The number and % of the region's total new single housing units that will be "small lot" (<5,500 sq. ft. lot size)
- The number of total new housing units for each local jurisdiction in the region
- The average overall residential density for the projected new housing development in each local jurisdiction
- The total number of new jobs for each local jurisdiction
- The number of new jobs categorized by job type for each local jurisdiction
- The average job density for new jobs for each local jurisdiction
- The number and % of each jurisdiction's new housing units that will be multifamily
- The number and % of each jurisdiction's new housing units that will be single-family
- The number and % of each jurisdiction's new single-family housing units that will be "small lot"

2. Provide a final PDA status report. The staff memo distributed to the RPC in Sept. 2010 (*Planned Priority Development Area Assessment-Planned Growth & Infrastructure Needs*, attached) described the need for such an analysis and committed to completing one: Please See Attachment B

The two primary goals of the PDA Assessment are to gain information about Planned PDAs in order to help hasten development of these areas as complete communities and to support the development of a realistic SCS. While all of the Planned PDAs have been proposed by local jurisdictions committed to sustainable transit-oriented development through local plans, they vary greatly in their visions of complete communities and readiness to produce new housing.

Using information primarily provided by local governments, the assessment will evaluate the scale and type of growth planned to occur in Planned PDAs, the strategies needed to ensure that this growth results in complete communities,

how ready local governments and communities are for growth to occur, and the investments needed to make this growth a reality. The desired outcomes of the assessment are to identify the PDAs most ready for implementation and growth potential, identify policies and resources needed to support essential elements of complete communities, and consider policies for prioritizing additional funding to the PDAs via the SCS. The Assessment may additionally assist the Potential PDAs by identifying strategies and policies to facilitate plan implementation.

Assessment Approach

The information to be used in the PDA Assessment has been gathered from our local government partners through one-on-one meetings with local city staff and an extensive survey. This information will be complemented by data from other sources, such as the U.S. Census. The assessment is organized around four main topics related to future development in the Planned PDAs:

- The *Growth Potential* assessment looks at amount and type of growth planned in the PDAs.
- The *Need* assessment evaluates the amount of types of funding that the PDAs need to achieve their □ desired growth. It also identifies policy changes needed to support growth in the PDAs.
- The *Readiness* assessment will gauge which PDAs are ready for higher-density, transit-oriented □ development. This analysis will focus on funding needs, entitlement process, transit capacity and □ connectivity, community support, and implementation feasibility.
- The *Completeness* assessment evaluates local plans and community characteristics to determine the □ extent to which PDAs are poised to become complete communities. This analysis focuses on housing choices, multi-modal access and mobility, and neighborhood identity and vitality.

We request the final report also include the following information for each PDA, to the extent not already contemplated in the September 2010 memo:

- Allowed residential density range
- Allowed job/employment density range
- Environmental review status: Can the planned housing and jobs (including at the maximum allowable density) be constructed without additional environmental review? If not, what specific type of additional environmental review is necessary?
- Can the planned housing and jobs (including at the maximum allowable density) be constructed without any additional "legislative" land use approvals (general plan, specific plan, rezoning, PUD zoning)? If not, what legislative land use approvals are necessary?
- Total cost of planned infrastructure
- Cost of planned infrastructure/housing unit based on mid-range of allowable density
- Does the PDA assume redevelopment funding as part of its financing? If so, how much?
How much of this funding has been eliminated with the shut down of RDAs?
- What is the total public cost necessary to make the PDA economically feasible?*

*When the business caucus met with agency staff and the agencies' economic consultant to develop the Economy Performance Target, the economic consultant stated that the scenario assessments would require these public costs to be accounted for in order to assess each scenario's progress toward meeting the Economy Performance Target accurately. The consultant stated that since the PDAs are planner/local public sector driven, rather than landowner/developer/market proposals, there will be public subsidy driven costs necessarily incurred with each tested scenario, in contradistinction to a trend/market driven scenario, and these costs must be internalized and captured for each scenario being considered.

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Attachment BBAY AREA BUSINESS COALITIONQuestions on Sustainable Communities Strategy

April 11, 2012

Process

1. There does not seem to have been an analysis done for a “trend” land use scenario. Disparate stakeholder groups specifically requested a trend scenario be modeled last summer in the same manner as the other scenarios. Are there plans to conduct such an analysis? See Attachment A response # 13
2. According to analysis done about a year ago by agency staff, the Current Regional Plans would reduce GHG by up to 10% by 2035 (attached). How does the CRPs GHG reductions compare to the expected GHG reductions under the DPS (Draft Preferred Scenario)? Please explain how Current Regional Plans performed better than Core Concentration and Focused Growth despite the fact the latter had the benefit of almost \$40 billion in additional assumed transit improvements for which there is no funding. See Attachment A response # 9
3. The agencies have declared that the Jobs-Housing Draft Preferred Scenario is reasonable and in compliance with federal planning requirements. Can you explain further how the agencies determined the scenarios comply with federal reasonableness requirements? Has a formal analysis been prepared? See Attachment A response # 18; the Draft Jobs-Housing Connection report, which is currently being revised, is the formal land use analysis.
4. The Bay Area is a nonattainment area and as part of the Clean Air Act conformity process must consult with federal agencies about the reasonableness of the land use projections in the RTP/SCA. Can you please provide a description of that process, including the agencies involved, the relevant officials from each agency, and a timeline of meetings/events. See Attachment A response # 18
5. Have you reviewed the EIR’s prepared for the SANDAG and SCAG RTP/SCSs? How do you anticipate the Bay Area’s approach to compare to theirs? See Attachment A response # 41

Consistency with locally adopted General Plans

6. The Plan Bay Area Process & Timeline flowchart (attached) identifies as part of Step5 “Compare options to existing local policies (ABAG)”. Has ABAG conducted this comparison of the Draft Preferred Scenario against “existing local policies”? What is considered included in “existing local policies”? See Attachment A response # 19
7. The Sept. 1, 2011 Memo “Alternative Land Use Scenarios” indicates that the 3 scenarios “do not yet include input from local jurisdictions or analysis of land constraints, industrial cluster support, or public and private investments. This input and analysis will be essential to develop the employment distribution for the Preferred Scenario.” Has this input and analysis been conducted for the Draft Preferred Scenario? See Attachment A response # 19
8. What do you envision will be the process used to determine whether an individual proposed project is consistent with the SCS? What agency do you envision making the consistency determination? See Attachment A response # 37

Regional housing needs

9. Does the Draft Preferred Scenario scenarios accommodate 100% of the region’s forecasted housing need? In the agencies’ opinion, does SB375 require the SCS to identify sufficient areas for housing to meet the region’s entire projected housing need so that if the housing were built there would be no in-commuting from other regions? Does it require at least a reduction in current levels of in-commuting? If not, do you believe the adopted SCS should do one or the other as a discretionary policy matter? See Attachment A response # 25

Density

10. The materials the agencies regularly distribute describing the PDA place types do not include densities. The place types come from the 2007 Station Area Planning Manual. The Manual does identify densities for each place type. The densities range from 20/acre to 300/acre. The Draft Preferred Scenario projects 75% of new housing units will be in PDAs.
 - a. Will the SCS specify density projections within respective PDAs?
 - b. How do projections for housing units within PDAs compare to existing General Plan designations for the areas covered by each PDA? See Attachment A response # 26
11. How does the Draft Preferred Scenario address the remaining new growth not projected to be accommodated in PDAs? See Attachment A response # 25
12. At the outset of the SCS process, the agencies suggested that it was reasonable to base the SCS on PDAs accommodating 50% of the region's projected growth. Can you explain further why the agencies determined that it was appropriate to move to 70% (75% for housing)? See Attachment A response # 26; upon further review, ABAG determined that some PDAs could accommodate higher densities. In addition there are approximately 60 PDAs that have been nominated by local governments and adopted by ABAG since the SCS process commenced.

Transportation funding

13. Under the Draft Preferred Scenario, how would the share of total future transportation spending differ for each county as compared to the current RTP? See Attachment A response # 29
14. The Bay Area currently spends 2% of total transportation funding on the category Road Expansion: HOV, HOT, ML; and 1% on Road Expansion: General Purpose. The corresponding figures for the other regions are SCAG (20% / 5%), SANDAG (16% / 23%), SACOG (3% / 13%) (see attached document). Do you think the SCS should have as a goal reducing the future share in the Bay Area to below the 2% and 1% figures? See Attachment A response # 30

Regulatory burdens

15. In the context of defining "complete communities," the workshop materials told participants (in person and online) "New development (housing) and transportation investments need to be carefully designed to maximize benefits for residents." At the San Francisco workshop, agency staff confirmed that this referred to existing residents. As examples of benefits, the materials identified increased parks and open space through development impact fees and better schools through school impact fees. Is it the agencies' opinion that the creation of complete communities depends fundamentally on requiring new housing projects to provide maximum benefits to existing residents? See Attachment A response # 33
16. The Business Coalition's comment letter on the initial One Bay Area (OBAG) proposal suggested that examination of jurisdictions' efforts to identify and remove or mitigate policies within its control that constrain housing development should be part of the criteria for considering grant applications. The revised OBAG proposal does not include this proposal. We believe it is very important that this issue be included in some way in the OBAG program. At the very least it should be a part of the application process if only as an information item that can be tracked over time. Will there be an opportunity to include this concept in the final OBAG program? If not, can you please explain the agencies' decision to remove it? See Attachment A response # 36; the April 2012 revisions/recommendations are available on our web page at: www.mtc.ca.gov/funding/onebayarea

Requests for Additional Information and Analysis

1. Comparative Analysis of Scenarios

For the following land use scenarios: Jobs-Housing Concentration, Current Regional Plans, and T2035 Most Aggressive (one of the alternatives studied extensively in the current RTP*): **using the same over all jobs and housing numbers and the same level of transportation funding and other assumptions that will be used for the Preferred Scenario**: Information currently available for the DRAFT Jobs-Housing Connection Scenario is outlined below. Current Regional Plans used different regional demographic control totals; it also used an earlier version of our new travel model. The T2035 land-use forecast utilized different regional control totals and our prior travel model.

- ☐ The number of total new housing units for the region 660,000
- ☐ The total number of new jobs in the region 1,119,918
- ☐ The number of total new housing units for each local jurisdiction in the region
Please see the DRAFT Jobs-Housing Connection Scenario Report; March 9, 2012; Appendices pp 42-45
- ☐ The total number of new jobs for each local jurisdiction
Please see the DRAFT Jobs-Housing Connection Scenario Report; March 9, 2012; Appendices pp 46-49
- ☐ The number of new jobs categorized by job type for each local jurisdiction
Please see Attachment C

The following items will be provided shortly under separate cover in relation to the Jobs-Housing Connection Scenario and the Current Regional Plans forecast.

- ☐ The average overall job density for the projected new jobs in the region
- ☐ The average job density for new jobs for each local jurisdiction
- ☐ The average overall residential density for the projected new housing development in the region
- ☐ The average overall residential density for the projected new housing development in each local jurisdiction

The following analysis is underway for the preferred scenario and will be modeled for the Sustainable Communities Strategy. However, it is important to note that the Sustainable Communities Strategy is not binding on local jurisdictions. Local jurisdictions will determine whether or not the development pattern outlined in the SCS is incorporated into their plans and zoning.

- ☐ The number and % of the region's total new housing units that will be multi family
- ☐ The number and % of the region's total new housing units that will be single-family
- ☐ The number and % of the region's total new single housing units that will be "small lot" (<5,500 sq. ft. lot size[†])
- ☐ The number and % of each jurisdiction's new housing units that will be multi family
- ☐ The number and % of each jurisdiction's new housing units that will be single-family
- ☐ The number and % of each jurisdiction's new single-family housing units that will be "small lot"

2. Provide a final PDA status report.

The PDA Assessment involved multiple interviews with jurisdictional staff and substantial analysis related to planned PDAs. Some of the analysis initially envisioned as part of a final report was incorporated into the development process of the SCS including the development of a PDA place type framework for all Priority Development Areas; the selection of place types by local jurisdictions for their respective PDAs based upon local PDA plans, growth capacity and readiness as well as work done by staff and our consultant team to inform the Sustainable Communities Strategy as well as analysis related to the development of the One Bay Area Grant. Please see Attachment C encompassing reports that have been developed in relation to the PDA Assessment conducted in 2010 and consultant reports and technical documents containing detailed information regarding the role of PDAs relative to employment and housing growth.

The staff memo distributed to the RPC in Sept. 2010 (Planned Priority Development Area Assessment – Planned Growth & Infrastructure Needs, attached) described the need for such an analysis and committed to completing one:

The two primary goals of the PDA Assessment are to gain information about Planned PDAs in order to help hasten development of these areas as complete communities and to support the development of a realistic SCS. While all of the Planned PDAs have been proposed by local jurisdictions committed to sustainable transit-oriented development through local plans, they vary greatly in their visions of complete communities and readiness to produce new housing.

Using information primarily provided by local governments, the assessment will evaluate the scale and type of growth planned to occur in Planned PDAs, the strategies needed to ensure that this growth results in complete communities, how ready local governments and communities are for growth to occur, and the investments needed to make this growth a reality. The desired outcomes of the assessment are to identify the PDAs most ready for implementation and growth potential, identify policies and resources needed to support essential elements of complete communities, and consider policies for prioritizing additional funding to the PDAs via the SCS. The Assessment may additionally assist the Potential PDAs by identifying strategies and policies to facilitate plan implementation.

* See attached Table 4 prepared by CARB during the target setting process based on information provided by MTC/ABAG.

† See same Table.

Assessment Approach

The information to be used in the PDA Assessment has been gathered from our local government partners through one-on-one meetings with local city staff and an extensive survey. This information will be complemented by data from other sources, such as the U.S. Census. The assessment is organized around four main topics related to future development in the Planned PDAs:

- *The **Growth Potential** assessment looks at amount and type of growth planned in the PDAs.*
- *The **Need** assessment evaluates the amount of types of funding that the PDAs need to achieve their desired growth. It also identifies policy changes needed to support growth in the PDAs.*
- *The **Readiness** assessment will gauge which PDAs are ready for higher-density, transit-oriented development. This analysis will focus on funding needs, entitlement process, transit capacity and connectivity, community support, and implementation feasibility.*
- *The **Completeness** assessment evaluates local plans and community characteristics to determine the extent to which PDAs are poised to become complete communities. This analysis focuses on housing choices, multi-modal access and mobility, and neighborhood identity and vitality.*

We **request** the final report also include the following information for each PDA, to the extent not already contemplated in the September 2010 memo:

Many of the items outlined below and that were not addressed relative to planned PDAs as part of the PDA Assessment work in 2010 will be considered in relation to policy development for Plan Bay Area. We look forward to working collaboratively with the Bay Area Business Coalition to advance the implementation of Plan Bay Area.

- ☐ The minimum and maximum residential density range.
- ☐ Minimum and Maximum job/employment density range.
- ☐ Environmental review status: Can the planned housing and jobs (including at the maximum allowable density) be constructed without additional environmental review? If not, what specific type of additional environmental review is necessary?
- ☐ Can the planned housing and jobs (including at the maximum allowable density) be constructed without any additional “legislative” land use approvals (general plan, specific plan, rezoning, PUD zoning)? If not, what legislative land use approvals are necessary?
- ☐ Total cost of planned infrastructure.
- ☐ Cost of planned infrastructure/housing unit based on mid-range of allowable density.
- ☐ Does the PDA assume redevelopment funding as part of its financing? If so, how much? How much of this funding has been eliminated with the shut-down of RDAs?
- ☐ What is the total public cost necessary to make the PDA economically feasible?[‡]

[‡]When the business caucus met with agency staff and the agencies’ economic consultant to develop the Economy Performance Target, the economic consultant stated that the scenario assessments would require these public costs to be accounted for in order to assess each scenario’s progress toward meeting the

Economy Performance Target accurately. The consultant stated that since the PDAs are planner/local public sector driven, rather than landowner/developer/market proposals, there will be public subsidy costs necessarily incurred with each tested scenario, in contradistinction to a trend/market driven scenario, and these costs must be internalized and captured for each scenario being considered.

ATTACHMENT C

Date Files:

- Jobs-Housing Connection Employment Distribution Details_2.xls
- Jobs-Housing Connection Employment Distribution Details_3.xls
- Jobs-Housing Connection Employment Distribution Details_1_2.xls
- Employment Distribution Patterns Presentation
- Memo for Regional Advisory Working Group September 2010 final
- Memo for Regional Advisory Working Group October 2010 final
- Memo for Regional Advisory Working Group November 2010 final
- CCSCE – Bay Area Job Growth to 2040
- CCSCE – Regional Projections to 2040 Presentation
- CTOD – Demographic Shift and Implications for TOD Housing Dem.
- CTOD – Historic and Projected Employments Trends in the Bay Area

See: http://www.onebayarea.org/plan_bay_area/land_use_data.htm

Data compilation is still underway, most notably on housing mix. As this information becomes available, we will post on this website.



Bay Planning Coalition



Jobs and Housing Coalition
"Improving Oakland Together"



April 11, 2012

Association of Bay Area Governments Executive Board
Metropolitan Transportation Commission

Dear Board Members and Commissioners:

The members of the Bay Area Business Coalition appreciate all the work and outreach that have gone into the preparation of the Sustainable Communities Strategy scenarios and the recently released Draft Preferred Scenario (DPS).

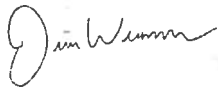
We strongly believe that the scenario that is finally adopted, in addition to meeting the goals and objectives of SB 375, should also be realistic and achievable and should also promote the Region's global economic competitiveness, productivity and efficiency.

To properly evaluate the DPS with these goals in mind, we have concluded that there remain important questions and additional information needed before we can offer substantive input or comments which will add value to the DPS. To that end, in February we met with your staff to begin discussion of these questions. We very much appreciated that opportunity and we understand that Agency staff are working on written responses to our questions. We believe that this information should be provided well in advance of the adoption of the DPS so that officials, stakeholders and the public have adequate time to review the material and participate in the process.

Because of the elevated status of an adopted DPS, which was confirmed by staff at our meeting, we want to stress the importance of having this information available. While it is our understanding that comments will be accepted on the DPS once it is adopted, we do not believe that would be an adequate substitute for the public and decision makers having access to important information before the adoption of a preferred growth pattern for the region. We also understand the desire to move the process along expeditiously. Again, however, we think it is inappropriate to view adoption of the DPS as simply the beginning of a process. The adoption of the DPS is the culmination of several years worth of analysis and public engagement, and thus should not be acted upon prematurely.

We very much appreciate your consideration of this important issue and look forward to receiving the responses to our questions attached prior to consideration of the DPS.

Sincerely yours,



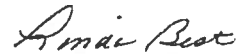
Jim Wunderman
Bay Area Council



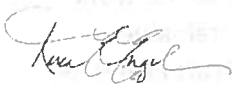
John Coleman
Bay Planning Coalition



Paul Campos
BIA Bay Area



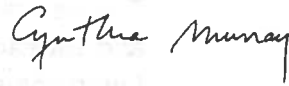
Linda Best
Contra Costa Council



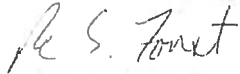
Karen Engel
East Bay EDA



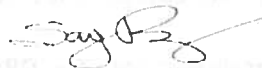
Gregory McConnell
Jobs & Housing Coalition



Cynthia Murray
North Bay Leadership Council



Rosanne Foust
SAMCEDA



Sandy Person
Solano EDC

BAY AREA BUSINESS COALITION**Questions on Sustainable Communities Strategy**Process

1. There does not seem to have been an analysis done for a “trend” land use scenario. Disparate stakeholder groups specifically requested a trend scenario be modeled last summer in the same manner as the other scenarios. Are there plans to conduct such an analysis?
2. According to analysis done about a year ago by agency staff, the Current Regional Plans would reduce GHG by up to 10% by 2035 (attached). How does the CRPs GHG reductions compare to the expected GHG reductions under the DPS (Draft Preferred Scenario)? Please explain how Current Regional Plans performed better than Core Concentration and Focused Growth despite the fact the latter had the benefit of almost \$40 billion in additional assumed transit improvements for which there is no funding.
3. The agencies have declared that the Jobs-Housing Draft Preferred Scenario is reasonable and in compliance with federal planning requirements. Can you explain further how the agencies determined the scenarios comply with federal reasonableness requirements? Has a formal analysis been prepared?
4. The Bay Area is a nonattainment area and as part of the Clean Air Act conformity process must consult with federal agencies about the reasonableness of the land use projections in the RTP/SCA. Can you please provide a description of that process, including the agencies involved, the relevant officials from each agency, and a timeline of meetings/events.
5. Have you reviewed the EIR’s prepared for the SANDAG and SCAG RTP/SCSs? How do you anticipate the Bay Area’s approach to compare to theirs?

Consistency with locally adopted General Plans

6. The Plan Bay Area Process & Timeline flowchart (attached) identifies as part of Step 5 “Compare options to existing local policies (ABAG)”. Has ABAG conducted this comparison of the Draft Preferred Scenario against “existing local policies”? What is considered included in “existing local policies”?
7. The Sept. 1, 2011 Memo “Alternative Land Use Scenarios” indicates that the 3 scenarios “do not yet include input from local jurisdictions or analysis of land constraints, industrial cluster support, or public and private investments. This input and analysis will be essential to develop the employment distribution for the Preferred Scenario.” Has this input and analysis been conducted for the Draft Preferred Scenario?
8. What do you envision will be the process used to determine whether an individual proposed project is consistent with the SCS? What agency do you envision making the consistency determination?

Regional housing needs

9. Does the Draft Preferred Scenario scenarios accommodate 100% of the region’s forecasted housing need? In the agencies’ opinion, does SB375 require the SCS to identify sufficient areas for housing to meet the region’s entire projected housing need so that if the housing were built there would be no in-commuting from other regions? Does it require at least a reduction in current levels of in-commuting? If not, do you believe the adopted SCS should do one or the other as a discretionary policy matter?

BAY AREA BUSINESS COALITIONDensity

10. The materials the agencies regularly distribute describing the PDA place types do not include densities. The place types come from the 2007 Station Area Planning Manual. The Manual does identify densities for each place type. The densities range from 20/acre to 300/acre. The Draft Preferred Scenario projects 75% of new housing units will be in PDAs.
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 - b. How do projections for housing units within PDAs compare to existing General Plan designations for the areas covered by each PDA?
11. How does the Draft Preferred Scenario address the remaining new growth not projected to be accommodated in PDAs?
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13. Under the Draft Preferred Scenario, how would the share of total future transportation spending differ for each county as compared to the current RTP?
14. The Bay Area currently spends 2% of total transportation funding on the category Road Expansion: HOV, HOT, ML; and 1% on Road Expansion: General Purpose. The corresponding figures for the other regions are SCAG (20% / 5%), SANDAG (16% / 23%), SACOG (3% / 13%) (see attached document). Do you think the SCS should have as a goal reducing the future share in the Bay Area to below the 2% and 1% figures?

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BAY AREA BUSINESS COALITION**Requests for Additional Information and Analysis****1. Comparative Analysis of Scenarios**

For the following land use scenarios: Jobs-Housing Concentration, Current Regional Plans, and T2035 Most Aggressive (one of the alternatives studied extensively in the current RTP*): using the same over all jobs and housing numbers and the same level of transportation funding and other assumptions that will be used for the Preferred Scenario:

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- ☐ The number of total new housing units for each local jurisdiction in the region
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- ☐ Minimum and Maximum job/employment density range.
- ☐ Environmental review status: Can the planned housing and jobs (including at the maximum allowable density) be constructed without additional environmental review? If not, what specific type of additional environmental review is necessary?
- ☐ Can the planned housing and jobs (including at the maximum allowable density) be constructed without any additional "legislative" land use approvals (general plan, specific plan, rezoning, PUD zoning)? If not, what legislative land use approvals are necessary?
- ☐ Total cost of planned infrastructure.
- ☐ Cost of planned infrastructure/housing unit based on mid-range of allowable density.
- ☐ Does the PDA assume redevelopment funding as part of its financing? If so, how much? How much of this funding has been eliminated with the shut-down of RDAs?
- ☐ What is the total public cost necessary to make the PDA economically feasible?[‡]

[‡]When the business caucus met with agency staff and the agencies' economic consultant to develop the Economy Performance Target, the economic consultant stated that the scenario assessments would require these public costs to be accounted for in order to assess each scenario's progress toward meeting the Economy Performance Target accurately. The consultant stated that since the PDAs are planner/local public sector driven, rather than landowner/developer/market proposals, there will be public subsidy costs necessarily incurred with each tested scenario, in contradistinction to a trend/market driven scenario, and these costs must be internalized and captured for each scenario being considered.

Plan BayArea

May 9, 2012

People Acting in Community Together (PACT)
1100 Shasta Avenue
San Jose, CA 95126

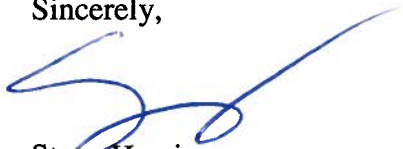
RE: Response to Letter Dated April 23, 2012 re: Support for the
6 Wins Network

Dear PACT Representatives:

Thank you for your involvement in the Plan Bay Area process and for your letter of April 23, 2012 which expresses your support for the 6 Wins Network. For your information, we have attached a copy of our response letter to the April 25, 2012 6 Wins Network's comment letter which addresses the concerns you have raised in your letter.

We encourage you to stay engaged in the Plan Bay Area process.

Sincerely,



Steve Heminger
Executive Director
Metropolitan Transportation Commission



Pat Jones
Assistant Executive Director
Association of Bay Area Governments

J:\PROJECT\2013 RTP_SCS\Correspondence\Jobs-Housing_Connection_TIS\Draft Response Letters\Response_PACT.docx

See 6 Wins comment and response letter #44.



April 23, 2012

Adrienne Tissier, Chair, and Members
Metropolitan Transportation Commission

Mark Luce, President/Chair, and Members
ABAG Executive Board and Administrative Committee

Dear Chairs and Members,

We are writing to express our support for the 6 Wins Network, whose region-wide goals - to provide low-income residents with affordable transit services and housing, protect communities against displacement, and promote a healthy environment - align closely with our local effort to ensure that public transit in Santa Clara County is affordable for all low-income residents. In particular, we want to reiterate the following addition to Plan Bay Area:

- I. Restore bus service back to a basic baseline of service, by restoring bus service to its peak levels over the past five years, at an estimated cost of \$70 million per year.¹ To accomplish this, the RTP should:
 - A. Prioritize existing transit funding and other flexible funding sources for bus operations and maintenance *before* this funding is used for *new* capital projects or non-transit needs (with the exception of OBAG funding);
 - B. Grow the pie of funding by renegotiating interest rate swaps and seeking new equitable, not regressive, taxation structures for transit;
 - C. Prioritize Transit Performance Initiative funds for high demand bus corridors; and
 - D. Identify and commit future revenues to increasing transit service in COC's and PDA's to help meet SCS targets.

Bus services are vitally important for low-income residents of our region. A study conducted by Urban Habitat, a member of the 6 Wins Network, shows that bus riders in Santa Clara County are overwhelmingly low-income (as high as 85% of ridership). We believe that the continued funding and expansion of bus services must be a priority for MTC in order to ensure that our region's most transit-dependent populations are served.

As people of faith, we believe our world's resources are given to us to be distributed for the good of the whole - justly and equitably. Our churches are often called upon to help with enormous unmet needs related to transportation and housing, and we are called to respond by creating long-term, sustainable solutions to those needs. We believe that affordable transit and housing options are key to lifting the yoke of poverty that

¹ 2010 dollars. Estimates are based upon data from National Transit Database.

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we witness every day from our doorsteps. This is especially true for residents of the Bay Area, where a family of four needs an income greater than three times the federal poverty level to make ends meet.

On the local level we are advocating to create a reduced fare on public transit, both bus and rail, for low-income residents so that everyone in Santa Clara County has reliable access to the resources necessary for a healthy, prosperous life. We also believe in the value of regional planning. When designed fairly to meet the needs of *all* residents, regional planning holds great promise for a healthier, more economically prosperous and socially equitable Bay Area. When disadvantaged communities shoulder too much of the burden and miss out on the benefits, it drives sprawl, segregation, and increasing car use that harms us all. Environment, economy, and equity issues are fundamentally intertwined, and making progress on any one of them requires that all three be addressed together.

We urge you and staff to take action on the recommendations of the 6 Wins Network, and we look forward to hearing from you as you make key decisions in the coming days.

Sincerely,

Downtown Cluster Local Organizing Committee
People Acting in Community Together (PACT)

An affiliate of the PICO network

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METROPOLITAN
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COMMISSION



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May 3, 2012

Mr. Ronald Munekawa
Chief of Planning
City of San Mateo
330 West 20th Avenue
San Mateo, CA 94403-1388

RE: Comments on Plan Bay Area

Dear Mr. Munekawa:

Thank you for your correspondence dated April 13, 2012, to Athena Ullah concerning the Plan Bay Area Jobs-Housing Connection Scenario and Transportation Investment Strategy.

Your comments will be presented to ABAG and MTC board members. Since the inception of Plan Bay Area, we have received numerous letters such as yours with detailed and thoughtful comments. ABAG and MTC staffs will present recommendations on a Preferred Scenario at a joint MTC Planning and ABAG Administrative Committee meeting on May 11, 2012.

Both agencies will meet jointly again on May 17 to approve a final Preferred Scenario. This will provide the basis for a draft Sustainable Communities Strategy (SCS) which will undergo an environmental assessment through the remainder of the calendar year. The draft SCS will be released at the end of this year, with adoption of a final SCS slated for April 2013.

We appreciate your concerns and suggestions. The outcome of this major planning effort will be better thanks to your participation.

Sincerely,

Doug Kimsey
Planning Director
Metropolitan Transportation Commission

Kenneth Kirkey
Planning Director
Association of Bay Area Governments



DEPARTMENT OF COMMUNITY DEVELOPMENT

330 West 20th Avenue
San Mateo, CA 94403-1388
Web Site: www.cityofsanmateo.org

April 13, 2012

Athena Ullah
Association of Bay Area Governments
PO Box 2050
Oakland CA 94604

RE: City of San Mateo Comments on the Draft Sustainable Communities Strategy Preferred Alternative

Dear Ms. Ullah,

Thank you for the opportunity to comment on the Sustainable Communities Strategy (SCS) Preferred Alternative (*Jobs-Housing Connection Scenario*). We have reviewed the document *Jobs-Housing Connection Scenario Draft Revised March 9, 2012* as well as the *Jobs-Housing Connection Housing Distribution Details.xls* and other material posted on San Mateo County SCS Working Group "Base Camp" web site.

The overall City projections for the period 2010 - 2040 appear to be reasonable given past projections and current City land use policies. However, in reviewing the material, the percentage of City growth assigned to 2 of the 3 Priority Development Areas (PDA's) in the City of San Mateo is greater than what would be anticipated.

In these two PDA's, the El Camino Real PDA and Rail Corridor PDA, the amount of development is not physically possible due to existing height limits and density maximums, as well as limits on the amount of land available for redevelopment. I am attaching our May 12, 2011 comment letter on the Initial Vision Scenario, as it details the parameters and analysis which was done to support this comment.

El Camino Real PDA

The Jobs-Housing Connection Housing Distribution Details spreadsheet, row 143 indicates a household growth of 1,202 between the years 2010-2040 for the El Camino Real PDA. While a significant number of new households can be anticipated in this area, recent examination of this area by Economic Planning Systems (EPS) indicates that 1,000 new households would be a more realistic projection.

However, since this is a 30 year projection, the magnitude of the differences between the two figures would not appear to be significant, as this area has not yet undergone significant redevelopment. I would note that small parcel size, shallow parcel depth, and the adjacency of residential neighborhoods do limit the development potential for this area.

Rail Corridor PDA

Rows 141 and 142 include the Rail Corridor PDA, showing a total of 5,105 (672 + 4,433) household growth between 2010-2040. In reviewing this projection, City staff identified the following areas:

- Existing Residential Neighborhoods, Commercial Areas and Recently Built Projects
- Recently Approved Projects
- Potential Identified Development Sites (assume 50 du/acre)
- The remaining acreage in this area (assumed to be developed at 50 du/acre)

This analysis indicated a maximum of 4,662 households could be developed, even with an assumption that all further development would occur with a density of 50 units/acre.

It should also be noted that residential densities, building heights and floor area ratios in the City of San Mateo are fixed by voter initiative, so increasing densities beyond the generally designated maximum of 50 units/acre (other than through the use of State mandated density bonus provisions), and building heights in excess of 55 feet would require a vote of the people. This voter initiative, Measure P, will extend through the year 2020. It should be noted that the original version of this voter initiative, Measure H, was approved by the voters in 1991. It was extended in 2004 and retains a broad base of support.

It appears that household formation projections are beyond that which can be physically accommodated within this PDA.

Thank you for considering the City of San Mateo's comments on the Draft Sustainable Communities Strategy Preferred Alternative. We look forward to working with both ABAG and MTC as the effort at developing a Sustainable Communities Strategy continues.

Sincerely,



Ronald Munekawa
Chief of Planning

Attachment: May 12, 2011 letter to Marisa Raya, ABAG

cc (w/o attachments): Mayor and City Council
Planning Commission
Susan Loftus, City Manager
Lisa Grote, Community Development Director
Larry Patterson, Director of Public Works
Sandra Council, Neighborhood Improvement and Housing Manager
Richard Napier, San Mateo City/County Association of Governments
Duane Bay, San Mateo County Director of Department of Housing



DEPARTMENT OF COMMUNITY DEVELOPMENT

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May 12, 2011

Marisa Raya
Association of Bay Area Governments
PO Box 2050
Oakland CA 94604

Dear Ms Raya,

Thank you for the opportunity to review and comment on the Initial Vision Scenario. The City of San Mateo does understand that the Initial Vision Scenario (IVS) is "unconstrained" and therefore may not reflect all of the local parameters regarding future development. In addition, given the changes to the employment forecasting model and regional housing needs based on the November 5, 2010 memo from the ABAG staff to ABAG Executive Board, we understand that changes would occur compared to previous *Projections* forecasts.

The City of San Mateo's comments are intended to provide some indication as to items the City will be most interested in as work progresses towards development of Sustainable Community Strategy alternatives.

The City of San Mateo recently amended its General Plan, adopted by the City Council on October 18, 2010. The General Plan and Environmental Impact Report are based on future growth resulting in a total of 48,360 dwelling units and 79,735 jobs by the year 2030. While this is a slightly different period than covered under the IVS (to the year 2035), the IVS totals of 56,678 new households and 58,896 new jobs represents a major change in the goals, policies and assumptions of San Mateo's General Plan and Environmental Impact Report. As noted above, while we understand the employment forecasting model and parameters for accommodating regional housing needs, a disparity of this magnitude between these figures is of concern to the City of San Mateo.

This disparity is noted in all of the Census Tract/ Metropolitan Transportation Commission Traffic Analysis Zones as provided to San Mateo County jurisdictions: SCS_VisionMTCByTAZ_Ver4_Mar14.xls
This information is summarized in an exhibit to this letter.

The 2010 General Plan update incorporates the San Mateo Rail Corridor Transit Oriented Development Plan (Rail Corridor Plan), adopted by the City on June 5, 2005. The Rail Corridor Environmental Impact Report examined a range of development alternatives, with "Scenario A" representing the least amount of potential development and "Scenario Z" representing the most intensive development option:

Table 1
Corridor Plan Land Use Development Scenarios

CORRIDOR SUBAREA	SCENARIO A		SCENARIO Z	
HAYWARD PARK AREA				
New Housing	636	units	1,725	units
maximum density in subarea (units/acre):		(< 25 u/a)		(< 75 u/a)
New Offices	412,100	s.f.	762,100	s.f.
New Retail	50,000	s.f.	150,000	s.f.
Total New Commercial	462,100	s.f.	912,100	s.f.
(office & retail, independent of uses to be replaced) ¹				
BAY MEADOWS PHASE II AREA				
New Housing	600	units	1,900	units
maximum density in subarea (units/acre):		(< 25 u/a)		(density TBD)
New Offices	900,000	s.f.	2,777,000	s.f.
New Retail	50,000	s.f.	200,000	s.f.
Total New Commercial	950,000	s.f.	2,977,000	s.f.
(office & retail, independent of uses to be replaced) ¹				
EL CAMINO REAL CORRIDOR				
New Housing	406	units	406	units
maximum density in subarea (units/acre):		(25 - 50 u/a)		(25 - 50 u/a)
New Offices	254,848	s.f.	254,848	s.f.
New Retail	355,831	s.f.	355,831	s.f.
Total New Commercial	610,679	s.f.	610,679	s.f.
(office & retail, independent of uses to be replaced) ¹				
CORRIDOR TOTAL	SCENARIO A		SCENARIO Z	
New Housing	1,642	units	4,031	units
New Offices	1,566,948	s.f.	3,793,948	s.f.
New Retail	455,831	s.f.	705,831	s.f.
Total New Commercial	2,022,779	s.f.	4,499,779	s.f.

As noted in this table, even "Scenario Z" the most intensive development option, would result in 4,031 units, much less than the 6,100 households projected for this area in the IVS (Page 67, Table 3-7 of *Plan Bay Area Initial Vision Scenario for Public Discussion*, March 11, 2011)

Generally, the initial Vision Scenario designated most of San Mateo's future growth within its three Priority Development Areas (PDAs): Downtown, the Rail Corridor Plan Area, and the El Camino Real Master Plan Area. While understanding that the Initial Vision Scenario is "unconstrained", the amount of development in some of these areas is not physically possible because of existing height limits and density maximums, as well as limits on the amount of land available for redevelopment.

It should also be noted that residential densities, building heights and floor area ratios in the City of San Mateo are fixed by voter initiative, so increasing densities beyond the generally designated maximum of 50 units/acre (other than through the use of State mandated density bonus provisions), and building heights in excess of 55 feet would require a vote of the people. This voter initiative, Measure P, will extend through the year 2020. It should be noted that the original version of this voter initiative, Measure H, was approved by the voters in 1991. It was extended in 2004 and retains a broad base of support.

Understanding that Census Tract to Metropolitan Transportation (MTC) Traffic Analysis Zone (TAZ) is not an exact match in some cases, this method is nevertheless used as a basis of comparison and should be appropriate given the general nature of the development projections being discussed. Additionally, the City of San Mateo's residential projections are described in terms of number of dwelling units, as opposed to households. While there is a difference between these two terms, again we are using them as a basis of comparison and should be appropriate given the nature of the development projections.

The attached Exhibits document the City's analysis of the City's 3 PDAs. Additionally, it was requested that five questions be given consideration in developing individual responses to the IVS. The questions and the City of San Mateo's responses follow below:

1. Is the proposed place type appropriate for your Priority Development Area(s), Growth Opportunity Area(s)? Given the availability of resources, is the proposed urban scale, mix of uses, and expected household growth appropriate?
2. What transportation improvements would help support those Priority Development Area(s), Growth Opportunity Area(s) in your jurisdiction?
3. What additional funding would be needed to support housing growth?

Response: For these three questions, please see the City of San Mateo PDA responses of December 15, 2010. While we did prepare detailed responses for each PDA, we included the following general comments:

"The principal issue we ran into is that two of San Mateo's PDA's (Downtown and Rail Corridor area) do not neatly fit into the place type categories. For example, Downtown San Mateo falls within the narrative description of "City Center" as provided in the *Station Area Planning Manual* text and Place Type Characteristic chart, but does not allow for high rise buildings or high densities as outlined in the Development Guidelines chart. Complicating this is the fact that maximum building heights and residential densities are fixed by voter initiative.

In the Rail Corridor PDA, the appropriate place type generally based on the narrative would appear to be Transit Neighborhood; however, there are not provisions for any type of commercial use. As noted in our completed form for this PDA, a substantial amount of office and retail has been approved/in process within in the Rail Corridor PDA."

4. If the Initial Vision Scenario growth estimate is too high, should some of the growth be shifted to another part of your jurisdiction, elsewhere in the County, or elsewhere in the region?

While the IVS household growth estimate appears too high, it does concentrate future residential growth within San Mateo's PDA's. However, as to the shifting of growth from San Mateo to other jurisdictions, it may be more appropriate to examine this issue when developing "Alternative Scenarios" as discussed at the SB 375 Regional Advisory Working Group meeting on May 3, 2011. This would allow for a region wide examination of potential growth areas based upon each alternative's parameters.

5. What are the challenges for your local jurisdiction to attract and retain jobs that match your local workforce?

As noted in the enclosed exhibit, it appears that job creation in the three San Mateo PDAs has been underestimated given recently approved projects. Affordable housing for the workforce is a challenge, particularly given the impacts of the recent *Palmer* decision. The City of San Mateo is currently examining alternatives to provide below market rate rental units in light of the *Palmer* decision.

In summary, the City of San Mateo's Initial Vision Scenario comments center on the overestimation of possible new households and possible underestimation of new jobs.

Thank you for considering the City of San Mateo's comments on the Initial Vision Scenario. We look forward to working with both ABAG and MTC as Sustainable Communities Strategy alternatives are developed.

Sincerely,



Ronald Munekawa
Chief of Planning

cc: Mayor and City Council
Planning Commission
Susan Loftus, City Manager
Lisa Grote, Community Development Director
Larry Patterson, Director of Public Works
Sandra Council, Neighborhood Improvement and Housing Manager
Richard Napier, San Mateo City/County Association of Governments
Joseph Kott, San Mateo City/County Association of Governments

Exhibits:

- City of San Mateo Initial Vision Scenario Response by Census Tract, text and spreadsheet.
Spreadsheet worksheet tabs:
 1. MTC TAZ/Census Tract Information provided by ABAG for all City of San Mateo Census Tracts
 2. Comparison of 2010 to 2035 household and Job Growth by Census Tract
 3. Land Use Inventory, MTC TAZ 278/Census Tract 607500
 4. Land use Inventory, MTC TAZ 279/Census Tract 607600

EXHIBIT**City of San Mateo Initial Vision Scenario Response by Census Tract**

- MTC TAZ 279, Census Tract 607500
Encompasses the San Mateo areas known as Bay Meadows, the Civic subarea of the City's Rail corridor Transit Oriented Development Plan, and Fiesta Gardens single family residential neighborhood and some portions of El Camino Real.
- MTC TAZ 279, Census Tract 6076
Encompasses the San Mateo areas known as Sunnybrae, 19th Ave Park, and the Hayward Park Station Subarea of the City's Rail corridor Transit Oriented Development Plan

For both of the two areas listed above, please see the attached spreadsheet.

As noted on this spreadsheet, City of San Mateo staff has listed:

- Existing Residential Neighborhoods, Commercial Areas and Recently Built Projects
- Recently Approved Projects
- Potential Development Sites (assume 50 du/acre)
- The remaining acreage in this area was then assumed to be developed at 50 units per acre, note, most of the remaining acreage consists of smaller parcels, with individual, as opposed to common owners.

As noted, the total projected number of new dwelling units/households for both of these areas is well below the projection included in the Initial Vision Scenario. This is particularly the case of Census Tract 60755 as the 3,026 projected dwelling units is approximately 60% of the Initial Vision Scenario projection for this area (5,115). The total number of projected dwelling units as indicated on the attached spreadsheet should also be considered as a maximum as it is not clear that all uncommitted land will in fact be redeveloped by 2035.

The commercial areas that were not considered for redevelopment are either adjacent to the Highway 101 State Route 92 interchange, immediately adjacent to the railroad right of way along Claremont Avenue, or along Palm Avenue. The City of San Mateo has several general plan policies that speak to retaining service commercial in these areas to support future residential development. Over the past decades, the commercial and manufacturing zoned areas have been decreasing, and the community has expressed concern that some areas be devoted to service uses needed to support residents and local employees.

Additionally many potential residential development sites also fall within the areas affected by the Bay Area Air Quality Management District (BAAQMD) proposed CEQA risk and hazards thresholds for new receptors. In reviewing these CEQA thresholds, there may be an impact on the ability to provide housing within Rail Corridor Plan areas. While in workshops examples were cited to allow projects in potential risk and hazard zones to mitigate potential impacts, the affect of these guidelines on a wide variety of projects is unknown.

While it appears that household formation projections are beyond that which can physically be accommodate within these areas, job growth, given the number of approved retail/office projects, looks to result in job creation beyond that anticipated in the Initial Vision scenario.

- MTC TAZ 257, Census Tract 606300
Encompasses the San Mateo's Downtown area and an adjacent low density residential neighborhood.

The San Mateo Downtown PDA is consistent with the narrative description of City Center provided in the Station Area Planning Manual developed by the Center for Transit Oriented Development in 2008. However, in reviewing the chart entitled Station Area Planning Manual Development Guidelines, there are some inconsistencies. As noted above, a voter imposed initiative fixes densities, building heights and floor area ratio maximums within the City of San Mateo. As a result "high rise" buildings and densities over 50 units per acre cannot be accommodated within the Downtown PDA. As a result, the classification of "Transit Town Center" more accurately describes the Development Guidelines and resulting development which pertain to downtown San Mateo.

The Downtown PDA includes San Mateo's Downtown historic district and many other individual buildings of historic significance. One significant challenge in development of the Downtown PDA is allowing for redevelopment to support additional dwelling units and employment, but at the same time maintaining these historic resources.

An additional consideration is the impact of major transit improvements on the ultimate development disposition of the Downtown PDA. The impact of the California High Speed Rail (HSR) project has been the subject of extensive community discussions over the past year. The existing railroad right of way in Downtown San Mateo is the narrowest on the San Francisco Peninsula to San Jose segment. The potential need for right of way acquisition to accommodate the HSR project may affect the size, shape and ultimate development viability of properties along the rail corridor in the Downtown. While the most recent discussions indicate a short term potential for using the present two track alignment, the HSR project has the potential to significantly affect development projections and alter the place type definition/characteristics of San Mateo's Downtown PDA.

A good portion of this area includes the East San Mateo neighborhood, which includes low density duplex and single family dwellings on small residential lots; this area consists of approximately 102 of the 255 total acres in this area. In addition, the existing Mills Peninsula Hospital complex and the City's Downtown historic district included an additional 25 acres. The remaining areas predominately include many small properties, under separate ownership, which complicates private redevelopment efforts given the difficulty in aggregating multiple properties. In addition, there are a number of absentee owners who do not appear to be motivated to redevelop underutilized properties.

Due to these factors, the City's most recent development projections anticipate approximately 300 additional dwelling units by the year 2035. While the unconstrained nature of the Initial Vision Scenario would result in a greater projection, the 2,178 projected household increase, which more than doubles existing households, is beyond what could be achieved in this area.

- MTC TAZ 284, Census Tract 607200
Hillsdale Shopping Center to Belmont border along El Camino Real

There are significant housing opportunities with potential mixed use development in the vicinity of the Hillsdale Shopping Center and in the 42nd Avenue neighborhood shopping area. The City of San Mateo General Plan requires preparation of a Specific Plan prior to any redevelopment of the 42nd Avenue area, which includes several underutilized parcels and excess right of way devoted to parking and circulation. While a significant number of new households can be anticipated in this area, recent examination of this area by Economic Planning Systems (EPS) indicates that 1,000 new households, as opposed to the IVS number of 1,705 would be a more realistic projection.

BayArea Plan

May 7, 2012

Mr. Jeff Hobson
Deputy Director
TransForm
436 14th Street, Suite 600
Oakland, CA 94612-2727

Dear Mr. Hobson:

Thank you for your April 13, 2012 letter to MTC's Planning Committee regarding the RTP draft Transportation Investment Strategy. Your letter provides recommendations for the 6 investment strategies discussed at the Planning Committee meeting. Our responses to your recommendations are as follows:

Strategy #1: Close the GHG emissions gap

Transform recommendation: Fund the Climate Innovative Grants program, based on evidence from the first round of funding, to follow through on commitments made in the last RTP.

Response: As you point out first cycle Climate Innovative Grant-funded projects are currently getting underway. However, in many cases we won't have usable data for a few years to fully evaluate near-term project/program effectiveness.

In the interim, we have done some fairly extensive assessment of various program's long-term effectiveness to reduce GHG emissions based on empirical data from programs in other areas and our own research; this information provides the basis for the data included in the "Climate Policy Initiative" options referenced in your letter.

Your letter takes exception to the fact that we are investing a large portion on the climate program's funds into vehicle technology and behavioral programs. Several sources, including ARB's adopted AB 32 Scoping Plan, indicate that accelerating the "greening of the fleet" is one of the most effective nearer-term strategies for reducing GHG emissions since nearly 40% of these emissions come from automobiles and small trucks. Recognizing this fact, MTC and the Air District funded about \$18 million for EV infrastructure in the first cycle of Climate Innovative Grant, so we have stayed fairly consistent with our approach to prioritize clean vehicle programs.

With regard to your assertion that these clean vehicle programs are not consistent with SB 375, we disagree. Even those who elect to move into TODs, most will own and drive cars; having a cleaner vehicle fleet, of combined with car-sharing opportunities and bicycle/pedestrian facilities, will make TOD's more desirable places to live.

Lastly, you indicate that the Vehicle Feebate and Buy-Back programs should be self-sustaining. For the feebate program that is largely true; however, we believe the buy-back program will need an ongoing

subsidy to provide a cash incentive on the order of \$1000 - \$2000 per vehicle, consistent with the BAAQMD program.

Strategy #2: Fix-it-First for Transit by Requiring BART and Muni to address their shortfalls

Transform Recommendation: Impose special requirements on at least BART and Muni to develop a funding plan to demonstrate how they will achieve a State of Good Repair, or at least how they will continue to maintain the existing level of repair. In the meantime, MTC should give greater scrutiny to capital expansion projects by the two agencies. MTC should commit discretionary funding to expansion projects that will decrease operating and maintenance costs, such as BART Metro and Muni's Transit Effectiveness Project, until each agency has a fully funded O&M plan.

Response: MTC currently partners with all transit operators to inventory capital replacement needs and develop plans for prioritizing and funding these replacements. Your focus on BART and SFMTA is likely attributable to these two operators representing over 60% of the remaining capital replacement need to meet the Plan Bay Area performance target. Because of their significant capital replacement needs, BART is actively working with their Board on strategies to increase local funding contributions to their capital asset replacement. Similarly, SFMTA has also stepped up efforts to improve their asset inventory and develop strategies to achieve a state of good repair. MTC has already started working with the large operators on specific funding plans for BART and SFMTA's upcoming major fleet replacement. In addition, MTC is supporting both the BART Metro and the San Francisco Transit Effectiveness Program, and both projects fit well with the proposed Transit Performance Initiative investment program.

Strategy #3: Get the OneBayArea Grant framework right

Transform Recommendation: Further revise the OBAG program to provide more guidance to counties to make the program better address displacement, encourage affordable housing, and support sustainable and equitable growth in PDAs.

Response: The revised OneBayArea grant proposal includes guidance and a comprehensive process for the counties to support sustainable and equitable growth in the PDAs. Specifically, the CMAs would be required to develop and approve a PDA Investment and Growth Strategy that addresses affordable housing production. The PDA Investment and Growth Strategy would initially include an analysis of housing production progress and an inventory of affordable housing policies currently enacted by each local jurisdiction and subsequently reflect recommended policies, if needed, to promote and preserve affordable housing in PDAs. Staff is also recommending that the release of the next round of OBAG funding be linked to the implementation of affordable housing policies around which local officials reach consensus. These changes will be considered at the Joint meeting of the MTC Planning and ABAG Administrative Committees on May 11, 2012.

Strategy #4: Fund the Highest Performer: BART Metro

Transform Recommendation: Dramatically increase funding for BART Metro.

Response: The cost for BART Metro is currently estimated at \$650 million. As noted in your letter, the BART Metro project was the highest rated project through the performance assessment based on the currently estimated project cost and scope. However, BART is just initiating conceptual studies on the BART Metro project so the cost and scope remain highly uncertain. While staff recommends including partial funding for the project at this time (\$150 million), we expect the project will be a strong

competitor for Transit Performance Initiative funding included in the plan currently as well as the future New Starts funds that remain in reserve, should federal rules change to allow this type of project.

Strategy #5: Squeeze more Efficiency with Smarter Investments

Transform Recommendation: In the Bay Area Express Lane Network eliminate the projects that would widen I-80 to Yolo County line and I-580 to the San Joaquin County line. Commit to a transparent public planning process to ensure the network creates more transportation choices and supports access for low-income residents.

Response: In the phasing plan, as outlined in the CTC application, these extensions would be the last pieces of the Network to be developed. The Commission will therefore have ample opportunity to review the full Network scope and phasing in light of actual performance of earlier segments of the Network. It is also important to consider benefits for recreational and truck travel in these corridors. In the meantime, staff recommends keeping these segments in the Plan to maintain consistency with the CTC application approved last fall. We see no reason to arbitrarily exclude the I-80 and I-580 segments in question simply because they are located at the periphery of the region

Planning and decision-making for the Express Lane Network will continue in parallel with Plan Bay Area. On April 3 2012, MTC held a publicly noticed special meeting of the Policy Advisory Council to discuss express lanes. Over the next several months, the public will have on-going opportunities to weigh in on policy decisions regarding Network phasing, financing and its operations as items are presented to MTC's Policy Advisory Council, and the Commission and its standing committees. All of these meetings are publicly noticed. In addition, the environmental process for individual segments will include noticed public meetings and other avenues for public comment.

MTC will consult with transit operators during the design and environmental process to develop a project that offers benefits for transit and carpools. The environmental clearance process will also include an environmental justice analysis; consistent with applicable state and federal requirements, this analysis will look at the impacts on low-income and minority residents.

Strategy #6: Make the Transit System Sustainable

Transform Recommendation: Increase investments in the Transit Performance Initiative and the Lifeline Transportation Program, with policy goals detailed above.

Response: Because the Transit Performance Initiative project is only in the pilot phase, staff is proposing the \$500 million investment in this plan, pending more information on the success of the program and other funding opportunities going forward.

With respect to the Lifeline Program, one of the most important steps to closing fixed-route transit service gaps is to get the transit operators on a more solid, financial footing. This is the objective of many of the Transit Sustainability Project recommendations. Further, the Plan Bay Area investment strategy provides approximately \$0.8 billion in funding for the Lifeline Transportation Program which supports and builds on the vast network of fixed route transit on the region. This investment is in addition to the over \$100 billion in transit operating funds proposed in Plan Bay Area that also serves communities of concern. Finally, as we have repeatedly stated in the past, fixed-route transit service is

not the only answer to mobility challenges for low-income residents; therefore, we need to cast a much wider net in identifying cost-effective lifeline investments.

With respect to a pilot program for means-based transit pass, in December 2012 the Commission set aside up to \$1 million in STA funds over a two-year period toward the development and implementation of a regional means-based discount program. Phase 1 will develop a regional concept for this program.

Should you have any questions or follow-up on these responses, please feel free to contact Doug Kimsey at 510-817-5790.

Sincerely,



Steve Heminger
Executive Director, MTC



April 13, 2012

Chair Jim Spering and Members of the Planning Committee
Metropolitan Transportation Commission
101 8th Street
Oakland CA 94607

Re: Planning Committee item #4a: Draft Transportation Investment Strategy

Dear Chair Spering and Commissioners,

The Sustainable Communities Strategy offers the Bay Area a great opportunity to fundamentally change the region's growth paradigm away from sprawl and towards walkable communities. SB 375 asks each region to develop a new blueprint for transportation, housing and land use that focuses on reducing driving and associated greenhouse gas emissions.

In addition to the GHG reduction targets, you embraced SB 375's performance focus by adopting a set of 10 targets to meet other key regional goals: providing housing for people of all incomes, improving health through more physical activity, reducing the cost of transportation, and preserving open space. More recently, we have applauded your decision to stick with that performance focus in the development and use of the Project Performance Analysis and the 'compelling case' process.

However, the performance analyses completed to date have shown that the region's alternative scenarios have fallen far short of the targets. According to MTC analyses, in each scenario:

- The Bay Area will only reduce GHG emissions by 8-9% per capita, well short of our 15% target. The Climate Policy Initiatives proposed in this new investment strategy will not bridge that gap.
- Low-income families will spend 84% or more of their income on housing and transportation. This is a recipe for debt and displacement that regional policy must attempt to combat.
- Inadequate housing will hurt the economy, reducing potential job growth by more than 10%.

These are not results that we can be proud of.

We recognize that the transportation investment package can only do so much towards any given target. But we need to do better.

The attachment presents a recommendation for improvement on each of the six strategies laid out in staff's proposed Draft Transportation Investment Strategy. Taken together, these recommendations will improve the plan, do a better job of responding to the your targets, and move us forward towards One Bay Area.

We urge you to direct staff to follow up on these recommendations in developing the preferred transportation investment strategy. We look forward to your conversation and to discussing these issues with you and staff.

Sincerely,

Jeff Hobson
Deputy Director

TransForm Recommendations on the Draft Transportation Investment Strategy

Strategy #1: Close the GHG Gap with an Effective Climate Policy Initiative

Neither option for the draft proposed Climate Policy Initiative presents an effective strategy for closing the GHG gap. Instead, MTC should invest in the innovative approaches begun in Transportation 2035.

In the last RTP, MTC drew strong support across the board for its new Climate Innovative Grants program, whose first funding cycle invested \$40 million for a wide range of innovative projects. The Commission committed to following up based on an objective evaluation of the results. But the two options appear to abandon that commitment.

The projects from the first cycle are now underway, and evaluation results are expected soon. For example, we are about to have the nation's first regional bike-sharing program. If the program is as successful here as it has been elsewhere, it will be a great low-cost high-impact project the region will want to expand. And further, it would improve the region's measures on almost every single one of the region's 10 adopted targets for the SCS. But there does not appear to be any room for that bike-sharing expansion in the proposed initiatives. The Climate Innovative Grants program funded a wide array of innovative approaches, including parking and transportation demand management approaches as well as some clean fuel/vehicle technology approaches.

Instead, both proposed options invest almost all of their funding in vehicle technology and behavioral programs. Certainly some of these approaches are important efforts to pursue. But making the combination of them the Bay Area's "Climate Policy Initiative" suffers from several flaws. First, it stretches credulity to believe that the region can buy a 7-8% per capita reduction in GHGs with a \$500-700 million investment over the next 28 years. Second, these vehicle technology and behavioral programs do little to meet all 10 SCS performance targets; they are vehicle emissions strategies, not the transportation and land use strategies envisioned by SB 375. And third, several of these are approaches that can and should be funded outside of the RTP investment structure; for example, a well-designed Clean Vehicle Feebate Program should be able to support the Vehicle Buy-Back and Plug-In/Electric Vehicle purchase incentives. These vehicle technology approaches should not be funded with precious STP/CMAQ funds.

Recommendation #1: Fund the Climate Innovative Grants program, based on evidence from the first round of funding, to follow through on commitments made in the last RTP.

Strategy #2: Fix-It First for Transit by Requiring BART & Muni to address their shortfalls

It is not good that the Bay Area's Regional Transportation Plan will leave huge shortfalls in maintaining our region's transit and local street networks at current levels, not to mention restoring lost transit service and bringing the system up to a state of *good* repair. We need more investment, and we need smart investments.

We recognize that the transit capital maintenance needs have ballooned to a point that the RTP cannot meet 100% of the shortfalls. And we recognize that the draft investment strategy fully funds vehicle replacement and a larger portion of the other high-scoring needs than T2035 (70% instead of 60%).

But the plan should have a strategy to rein in these shortfalls. The last several RTPs have been unable to meet the shortfalls, and the shortfalls only grow bigger. That should not be acceptable. The biggest shortfalls are with BART and Muni, 2/3 of the total transit shortfall. Both agencies are taking important steps towards addressing their backlog – such as BART's recent movement towards using operating revenues to support the car replacement program – but much more is needed.

Metro would increase the efficiency of BART in the urban core by constructing new turnbacks, providing new express train service, and investing in automatic train controls that will make trains run more efficiently. BART Metro is cost-effective, it supports growth in PDAs, and it promotes almost all of the 10 SCS targets. It is the most slam-dunk investment in the whole plan.

We recognize that the project needs more study. We understand that the draft investment strategy retains some “New/Small Starts” funding in reserve for projects in the planning stages, and that BART Metro could in the future compete for those funds. But that future is a long ways off. And that offer – “you can fight for future discretionary funds” – is a very thin commitment to the best performing project in the whole RTP analysis.

Recommendation #4: Dramatically increase funding for BART Metro.

Strategy #5: Squeeze more Efficiency with Smarter Investments

TransForm continues to believe that Express Lanes *could* be a good step towards equitable road pricing, if they create more transportation choices and support access for low-income residents. But the information available so far suggests that MTC’s current approach will not reach those goals and that there is no public planning process to work towards a better system.

When MTC approved the CTC application last fall, we urged you to initiate a transparent public planning process for the Bay Area Express Lane Network, in parallel with the CTC application, and that the process should:

- Fully integrate and expand express buses, vanpools, and carpools to maximize benefits for all of us based on best practices from around the U.S.
- Analyze how low-income commuters in the Bay Area, already burdened by the highest combined costs for transportation and housing in the entire country, can benefit from the network, and
- Ensure that this multi-billion dollar transportation project meets our SCS targets and significantly reduces greenhouse gases and the amount we drive

Several Commissioners echoed these concerns and spoke in support of a public planning process. MTC staff stated that there would be public planning meetings. With that reassurance, the Commission voted to proceed with the application with no requirement for a public planning process. And yet, to our knowledge, no publicly-noticed planning meetings have yet taken place nor are there any plans to do so as a part of the SCS/RTP process, where this planning should take place.

For the network under MTC’s control (as opposed to the portion of the network controlled by VTA), we are most concerned about the 120 miles of highway expansions, particularly the outward expansions to the edges of the region: the I-80 widening to the Yolo County line and the I-580 widening to the San Joaquin County line. Instead of using express lane revenues to build those sprawl-inducing widenings, the network should at least use those revenues instead transit service along the express lane corridors where the revenues are collected.

Recommendation #5: In the Bay Area Express Lane Network, eliminate the projects that would widen I-80 to Yolo County line and I-580 to the San Joaquin County line. Commit to a transparent public planning process to ensure the network creates more transportation choices and supports access for low-income residents.

Recommendation #2: Impose special requirements on at least BART and Muni to develop a funding plan to demonstrate how they will achieve a State of Good Repair, or at least how they will continue to maintain the existing level of repair. In the meantime, MTC should give greater scrutiny to capital expansion projects by the two agencies. MTC should commit discretionary funding to expansion projects that will decrease operating and maintenance costs, such as BART Metro and Muni's Transit Effectiveness Project, until each agency has a fully funded O&M plan.

Strategy #3: Get the One Bay Area Grant framework right

TransForm supports the draft investment strategy's approach of assigning all of the Local Streets and Roads system preservation funds to the One Bay Area Grant program. That is much larger than the OBAG program currently under discussion, so it would give the region more ability to encourage growth in Priority Development Areas.

But that potential will only be reached if the region designs a good OBAG program. TransForm is reviewing the revised draft put out recently by staff and recognizes that this discussion is not the right time for detailed input on OBAG. For today's meeting, we will simply put out two main conclusions:

- The draft program still does far too little to address displacement and encourage affordable housing; and
- The draft program provides far too little direction to county CMAs to help insure that the program will actually invest in ways that support sustainable and equitable growth in PDAs.

We also want to comment that it is disappointing to see MTC appearing to retreat from the regional programs. The draft strategy takes the vast majority of what used to be dedicated to Transportation for Livable Communities, Planning, and Regional Bike Network funds – mostly distributed regionally – and puts them into an OBAG program whose distribution is given over almost entirely to county control. We understand that the intent: to create more commitment to the OBAG goals within the county agencies. But we are concerned that the current program design does not do enough to ensure that the program will actually achieve those goals.

Recommendation #3: Further revise the OBAG program to provide more guidance to counties to make the program better address displacement, encourage affordable housing, and support sustainable and equitable growth in PDAs.

Strategy #4: Fund the Highest-Performer: BART Metro

We have previously commented on the groundbreaking Project Performance Assessment (PPA) that represents an excellent attempt to connect the 10 RTP targets adopted last year to specific investments.

In that analysis, BART Metro was the highest-ranked project: it was listed as having a Benefit/Cost ratio of ">60." In fact, the project did even better than that: the analysis found that the project would actually *reduce* operating and maintenance costs. Plus, it has an overall targets score of 8.5, the highest score any project achieved.

But the draft investment package only commits \$160 million to BART Metro, \$100 million of which is in the proposed Alameda County sales tax. Every other project with a B/C ratio over 10 is fully, or nearly fully, funded in the RTP. Many other, much lower-ranked projects, get much more funding than BART Metro. This doesn't make sense.

BART Metro is exactly the kind of investment that MTC should fund in this new SB 375 era, when the federal government is encouraging transit agencies to invest in their State of Good Repair. BART

Strategy #6: Make the Transit System Sustainable

On the Transit Sustainability Project, TransForm commented earlier this week at the Select Committee, so we will not repeat those comments in detail here. While the progress in the TSP is incremental and much less dramatic than we had hoped, it is a critical start. This start needs to lead to improvements that will reduce costs and improve service.

The Transit Performance Initiative presents a good opportunity for the highest and best uses for regional funding – low-cost, high impact projects that can speed up existing bus and light rail, thereby reducing operating costs and attracting riders. TransForm supports the proposal to have the TPI become an ongoing investment.

At the same time, we recognize that there remains a risk that an intensive focus on efficiency could have adverse impact on people who rely on transit for all trips – since nights and weekends are not "cost-effective" and therefore could be cut to help meet the per passenger target. The TSP must achieve cost savings with a watchful eye to avoid such service cuts.

This is also why MTC must invest in the Lifeline Transportation Program to ensure low-income communities have access to mobility. We will address Lifeline in this strategy, even though it is not included in the investment strategy, because the staff presentation simply does not mention the Lifeline program in *any* of the slides about the draft investment strategy.

The Lifeline program should pursue three policy goals with three components:

- Close gaps in fixed-route transit service to link communities of concern to opportunities, particularly key employment centers. This should be a regional program, as many of the key gaps are across county lines.
- Provide targeted improvements in specific communities of concern, as identified by Community-Based Transportation Plans. This should be a continuation of the existing Lifeline Transportation program. MTC staff assessment showed a \$4.2 billion need over the RTP timeframe, but the proposed investment strategy fills less than 20% of that need.
- Reduce transit costs by starting a pilot program for a means-based lifeline transit discount pass, based on the recently-started study.

Recommendation #6: Increase investments in the Transit Performance Initiative and the Lifeline Transportation Program, with policy goals detailed above.



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May 2, 2012

Ms. Beth Walukas
Deputy Director of Planning
Alameda County Transportation Commission
1333 Broadway, Suites 220 & 300
Oakland, CA 94612

RE: Comments on Plan Bay Area

Dear Ms. Walukas:

Thank you for your correspondence dated 4/16/2012 to Ken concerning the Plan Bay Area Jobs-Housing Scenario and Transportation Investment Strategy.

Your comments will be presented to ABAG and MTC board members. Since the inception of Plan Bay Area, we have received numerous letters such as yours with detailed and thoughtful comments. ABAG and MTC staffs will present recommendations on a Preferred Scenario at a joint MTC Planning and ABAG Administrative Committee meeting on May 11, 2012.

Both agencies will meet jointly again on May 17 to approve a final Preferred Scenario. This will provide the basis for a draft Sustainable Communities Strategy (SCS) which will undergo an environmental assessment through the remainder of the calendar year. The draft SCS will be released at the end of this year, with adoption of a final SCS slated for April 2013.

We appreciate your concerns and suggestions. The outcome of this major planning effort will be better thanks to your participation.

Sincerely,

A handwritten signature in black ink, appearing to read 'Doug Kimsey'.

Doug Kimsey
Planning Director
Metropolitan Transportation Commission

A handwritten signature in black ink, appearing to read 'Ken Kirkey'.

Kenneth Kirkey
Planning Director
Association of Bay Area Governments



1333 Broadway, Suites 220 & 300

Oakland, CA 94612

PH: (510) 208-7400

www.AlamedaCTC.org

Steve. Ann. Dougk. Pi

April 16, 2012

Mr. Ken Kirkey
 Association Bay Area of Governments
 MetroCenter
 101 Eighth Street
 Oakland, CA 94607

RECEIVED**APR 25 2012****MTC**

Thank you for the opportunity to comment on the recently released Draft Preferred Sustainable Communities Strategy (SCS): Jobs-Housing Connection Scenario. The Alameda CTC, along with our city and county planning directors, has been engaged over the last 18 months in reviewing the Initial Vision Scenario, the Alternative Land Use Scenarios, and now the Draft Preferred SCS: Jobs-Housing Connection Scenario. We have worked closely with our 15 local jurisdictions in an attempt to align the regional trends in job and household growth under the various scenarios with the Alameda County Land Use Scenario Concept that was developed for and evaluated as part of our 2012 Countywide Transportation Plan (CWTP) update and Transportation Expenditure Program (TEP). As the CWTP and the TEP developed by Alameda CTC serves as input into the Regional Transportation Plan (RTP), we would like to develop the most realistic future growth scenario to accurately reflect the policy parameters and vision set by local jurisdictions within the county and to meet the objectives of the regional Sustainable Community Strategy (SCS).

Our comments are based on common concerns expressed by our local jurisdictions as well as a comparison of the Draft Preferred Sustainable Communities Strategy (SCS): Jobs-Housing Connection Scenario and the Alameda County Land Use Scenario Concept, the assumptions and outputs of which were provided to ABAG staff in January 2012 for use in developing the Draft Preferred Sustainable Communities Strategy (SCS): Jobs-Housing Connection Scenario. Individual Alameda County jurisdictions will also be submitting comments separately.

Funding the SCS: Elimination of Redevelopment Agencies

The State's elimination of redevelopment agencies, which has resulted in not only the loss of funding and planning agency staff, but also the disinvesting of public assets, will make it difficult, if not impossible, to accommodate the growth assumed in the Jobs-Housing Connection Scenario. This fiscal constraint along with solutions that address the loss of funding associated with the elimination of redevelopment agencies must be addressed in any scenario that is adopted for the SCS. For communities that are expected to take the level of employment and housing growth projected in the Preferred SCS, long term, reliable funding must be provided to ensure the development of complete communities, which include public services and jobs in addition transportation. Identifying sources of funding for public services

other than transportation as well as additional funding for transportation should begin now and addressed in the final scenario.

Comparison of Countywide to Regional Growth Assumptions

There remain significant differences between the distribution of household and employment growth between the ABAG/MTC Scenario and the Alameda CTC Scenario. Attachment A summarizes those differences, but overall a comparison of the Draft Preferred Sustainable Communities Strategy (SCS): Jobs-Housing Connection Scenario and the Alameda County Land Use Scenario Concept shows that approximately 24,000 less households and 48,000 more jobs are expected in Alameda County in 2040. While individual jurisdictions will be providing more specific comments about distribution in their areas, Alameda CTC would like to understand the rationale for the differences and how households and employment were assigned within Alameda County to account for these differences as well as to understand how households and employment were distributed throughout the region.

The Alameda County Land Use Scenario Concept was evaluated as part of the 2012 Alameda CWTP update, which is currently available as a draft document at http://www.alamedactc.org/app_pages/view/3070. A performance based evaluation was done using measures similar to those being used in the development of the Regional Transportation Plan and the SCS (Attachment B). The results show that with the Alameda County Land Use Scenario Concept and the fully funded transportation investments proposed, increases in access to frequent transit and activity centers is provided, especially to those in the lowest income quartiles and greenhouse gas emissions are reduced by 24% per capita over 2005 conditions exceeding the region's 15% goal.

Growth Inside vs. Outside PDAs/GOAs

The main objective of the Sustainable Community Strategy is to accommodate our future population and employment growth within the framework of a more environmentally sustainable land use model. Increased density and growth around transit hubs are the basis for this model. Both the Alameda County Scenario and the Draft Preferred Scenario would achieve a majority of growth within designated or proposed Priority Development Areas (PDAs) or Growth Opportunity Areas (GOAs), moving us towards these objectives, but the success varies among alternatives.

We realize that it is a challenge to predict the distribution of housing and job growth throughout the region, but we believe that the local jurisdictions have the best information to assess where the development is likely to occur. We encourage ABAG/MTC to consider the use of the Alameda County Land Use Scenario Concept in place of the Draft Preferred Scenario that has been developed through the regional process with much more limited input from the local jurisdictions and the county.

The local scenario would achieve a slightly more focused housing growth (3% more) in the PDAs while incorporating 20,000 more households than is currently reflected in the Draft Preferred Scenario and would achieve a similar focus in job growth (Attachment C), moving us closer to

the desired SCS outcome. Including GOAs increases the households and employment in transit oriented development areas even more (87% for households and 87% for jobs). While we understand that funding will be directed to PDAs, it is also important to not lose sight of GOAs that were identified in the SCS development process and may be candidates for future PDAs or employment centers for which transportation linkages are needed. The SCS process has illustrated the importance of linking PDAs and employment centers with transit and other transportation options, which the Alameda County Land Use Scenario Concept has achieved.

Regional Housing Needs Assessment (RHNA)

An important concern among the jurisdictions is a better understanding the connection between the SCS and RHNA and the level of support the cities and counties will receive for implementing RHNA. The Draft Housing Methodology identifies the SCS as a key input. The jurisdictions are concerned that if the RHNA is proportional to the SCS, then having an overly aggressive housing allocation in the SCS will result in the same for the RHNA allocation.

In summary, we hope that we are still able to work with ABAG to identify a land use scenario for Alameda County that is supported by the local jurisdictions and can be incorporated into the regional growth forecasts, with little if any change required if not for the 2013 SCS, then for the 2017 SCS. Our goal is to streamline the process and find a solution that serves both regional and local needs. The Alameda CTC is able to serve as a link between the Alameda County Planning Directors and ABAG to develop such a land use scenario.

Sincerely,



Beth Walukas, Deputy Director of Planning

Attachments:

Attachment A: Comparison of the Draft Preferred Sustainable Communities Strategy (SCS): Jobs-Housing Connection Scenario and the Alameda County Land Use Scenario Concept

Attachment B: Performance Based Evaluation of the Alameda County Land Use Scenario Concept

Attachment C: Comparison of Household and Employment Growth Allocations to PDAs and GOAs

Cc:

Mr. Mark Luce, Chair, ABAG Administrative Committee (without attachments)

Mr. James Sperling, Chair, MTC Planning Committee (without attachments)

Alameda CTC Board (without attachments)

Alameda County Planning Directors

Alameda County Technical Advisory Committee (without attachments)

Ms. Miriam Chion, ABAG

Ms. Athena Ullah, ABAG

Mr. Doug Kimsey, MTC

Mr. Art Dao, Executive Director

Ms. Tess Lengyel, Deputy Director of Policy, Legislation and Public Affairs



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May 2, 2012

Mr. Steven Falk
City Manager
City of Lafayette
3675 Mt. Diablo Blvd., Suite 210
Lafayette, CA 94549

RE: Comments on Plan Bay Area

Dear Mr. Falk:

Thank you for your correspondence dated 4/16/2012 to Ken concerning the Plan Bay Area Jobs-Housing Scenario and Transportation Investment Strategy.

Your comments will be presented to ABAG and MTC board members. Since the inception of Plan Bay Area, we have received numerous letters such as yours with detailed and thoughtful comments. ABAG and MTC staffs will present recommendations on a Preferred Scenario at a joint MTC Planning and ABAG Administrative Committee meeting on May 11, 2012.

Both agencies will meet jointly again on May 17 to approve a final Preferred Scenario. This will provide the basis for a draft Sustainable Communities Strategy (SCS) which will undergo an environmental assessment through the remainder of the calendar year. The draft SCS will be released at the end of this year, with adoption of a final SCS slated for April 2013.

We appreciate your concerns and suggestions. The outcome of this major planning effort will be better thanks to your participation.

Sincerely,

Doug Kimsey
Planning Director
Metropolitan Transportation Commission

Kenneth Kirkey
Planning Director
Association of Bay Area Governments



City Council

Carol Federighi, Mayor
 Mike Anderson, Vice Mayor
 Brandt Andersson, Council Member
 Carl Anduri, Council Member
 Don Tatzin, Council Member

April 16, 2012

Ken Kirkey, ABAG Director of Planning and Research
 Association of Bay Area Governments
 P.O. Box 2050
 Oakland, CA 94607-4756

Subject: Response to *Draft Jobs-Housing Connection Scenario*

Dear Mr. Kirkey:

Thank you for the opportunity to submit the City of Lafayette's comments on the *Draft Jobs-Housing Connection Scenario (Scenario)*, dated March 9, 2012. We appreciate ABAG's and MTC's continued efforts to develop the process and products to comply with SB 375, and we want to thank ABAG and MTC staff for addressing some of the City's previous concerns.

The following are our comments regarding the *Scenario's* housing and job growth distributions. Given that we are submitting our comments by the April 18 deadline, we expect to see our comments incorporated into the next phase of the report. This assurance was stated in your March 23, 2012 memo to local jurisdictions and SCS stakeholders, and repeated to the Contra Costa planners group at the April 13, 2012 meeting at the Contra Costa Transportation Authority.

Housing Distribution

We agree with the housing unit and household growth distribution for Lafayette as shown on page 42 of the *Scenario*. The numbers are in line with the City's projections in our General Plan and the current version of the draft Downtown Specific Plan (DSP), and they are consistent with the City Council's letter to ABAG and MTC, dated January 31, 2012.

Job Distribution

However, job distribution growth is not consistent. The growth in Lafayette's total employment between 2010 and 2040, as shown in the *Scenario*, is an additional 3,330 jobs. Of this number, 1,990 jobs would be in the PDA and the remaining 1,340 would be outside the downtown. These numbers are not consistent with the City's plans, and the City's previous comments to ABAG and MTC have not been addressed.

- The total job distribution is unreasonable. While it is likely there will be increased telecommuting and home-based occupations throughout the city in the future, the only centers of employment outside the downtown are in the local schools. As shown in your distribution for 2010-2040, it is very unlikely that the schools will experience any growth in employees in the future given that enrollment has been trending downward the past few years. And it is equally unlikely that the additional financial and professional jobs will be added outside the downtown.
- For the PDA, the downtown cannot accommodate 1,990 additional jobs. As demonstrated through the DSP process, additional growth in Lafayette's downtown, even under the General Plan, will result in substantial traffic impacts. These impacts are even more significant because of projected growth in Moraga. This is growth that is beyond our control, and yet it significantly affects the quality of life in Lafayette every day. There will be other environmental issues as well. It is the goal of both the General Plan and DSP to maintain our downtown character and preserve our hillsides and existing neighborhoods. Meeting this goal constrains future development. Even achieving the projections in the General Plan ultimately may not be feasible. As stated in our May 2011 and January 2012 letters to ABAG and MTC, these constraints include:
 - Because of our topography and the soil conditions of our hillsides, more intense levels of development are limited to the downtown. There are no opportunities for employment growth outside the downtown.
 - The downtown is limited by a lack of parcels available or suitable for redevelopment. The DSP EIR estimated that at most 30 percent of the downtown would redevelop by 2030.
 - Existing traffic Levels of Service in the downtown are already at LOS D at some intersections with two major intersections at LOS F. The DSP EIR shows that under the General Plan buildout scenario more intersections could reach LOS D, E, and F by 2030 and mitigation may not be feasible.
 - A network of creek corridors with significant riparian habitat crisscrosses the downtown limits potential development sites.
 - There is a lack of parks in the downtown – only 0.7 acres. This does not come close to meeting our General Plan's standard of 5 acres / 1,000 residents. The DSP proposes three additional parks in the downtown to meet this shortfall, and these park sites would not be available for additional development.
- Both the General Plan and the current version of the DSP project an additional 138,000 square feet in office uses and an additional 138,000 square feet in retail uses by 2030. Based on the Downtown Lafayette Specific Plan Economic and Fiscal Analysis prepared for the City in 2010 by Seifel Consulting, this amount of commercial development could result in 736-1,150 jobs. However, the Analysis also notes that this amount of commercial development might not be supportable even with the projected additional residential development.

City of Lafayette
Response to Draft Jobs-Housing Connection Scenario
April 16, 2012
Page 3 of 3

Therefore, we ask that the job distribution numbers for the total employment and for the PDA employment be reduced to be consistent with the City's numbers. Using our numbers is the only way the City can support the Sustainable Communities Strategy.

Thank you again for the opportunity to comment. We look forward to our comments being incorporated into the next version of the Scenario. In the meantime, if you have any questions, please contact Ann Merideth, Special Projects Manager, at amerideth@ci.lafayette.ca.us or 925.284.1968.

Sincerely,



Steven B. Falk
City Manager

Cc: Mayor Federighi and Members of the Lafayette City Council
Athena Ullah, ABAG
Sailaja Kurella, ABAG



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May 2, 2012

Ms. June Catalano
City Manager
City of Pleasant Hill
100 Gregory Lane
Pleasant Hill, CA 94523-3323

RE: Comments on Plan Bay Area

Dear Ms. Catalano:

Thank you for your correspondence dated 4/16/2012 to our agencies concerning the Plan Bay Area Jobs-Housing Scenario and Transportation Investment Strategy.

Your comments will be presented to ABAG and MTC board members. Since the inception of Plan Bay Area, we have received numerous letters such as yours with detailed and thoughtful comments. ABAG and MTC staffs will present recommendations on a Preferred Scenario at a joint MTC Planning and ABAG Administrative Committee meeting on May 11, 2012.

Both agencies will meet jointly again on May 17 to approve a final Preferred Scenario. This will provide the basis for a draft Sustainable Communities Strategy (SCS) which will undergo an environmental assessment through the remainder of the calendar year. The draft SCS will be released at the end of this year, with adoption of a final SCS slated for April 2013.

We appreciate your concerns and suggestions. The outcome of this major planning effort will be better thanks to your participation.

Sincerely,

A handwritten signature in black ink, appearing to read 'Doug Kimsey'.

Doug Kimsey
Planning Director
Metropolitan Transportation Commission

A handwritten signature in black ink, appearing to read 'Kenneth Kirkey'.

Kenneth Kirkey
Planning Director
Association of Bay Area Governments

*Spec. Ann. Adv. P.I.***City of Pleasant Hill**

April 16, 2012

RECEIVED
APR 20 2012
MTC

Ms. Adrienne J. Tissier, Chair
Metropolitan Transportation Commission
Joseph P. Bort MetroCenter
101 Eighth Street
Oakland, CA 94607

Mr. Mark Green, Chair
Association of Bay Area Governments
PO Box 2050
Oakland, CA 94607

SUBJECT: City of Pleasant Hill Comment Letter - Sustainable Communities Strategies (SCS) –
Jobs-Housing Connection Scenario

Dear Ms. Tissier and Mr. Green:

Please consider the following comments regarding the latest Jobs-Housing Connection Scenario recently released by the Association of Bay Area Governments (ABAG) and the Metropolitan Transportation Commission (MTC). The City of Pleasant Hill sincerely appreciates the continuing efforts both ABAG and MTC to listen to, and attempt to address, our concerns regarding the proposed SCS. We are pleased to note that housing growth projections included in the most recent draft of the proposed "preferred" SCS scenario appear to be moving in the right direction to achieve greater consistency with the future housing growth anticipated in our General Plan; however, a further reduction in projected housing growth would better reflect the future vision for our community expressed in our General Plan (see also our previous correspondence dated January 30, 2012, December 20, 2011 and May 17, 2011). The most recent projected increase of 1,590 households and 5,650 jobs in Pleasant Hill by the year 2040 still appears to be unrealistically high based on historic growth patterns, local physical constraints and the City's General Plan.

The City remains supportive of the goals of the SCS process provided that our ongoing concerns over growth projections for households and employment are adequately addressed. We look forward to continuing to work with you and your staff to further refine these projections. If you have any questions please contact me at (925) 671-5204 or through email at jcatalano@ci.pleasant-hill.ca.us.

Sincerely,

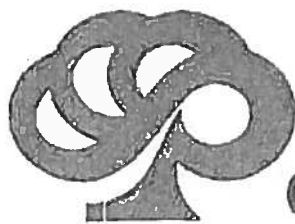
June Catalano
City Manager

April 16, 2012
Page 2

Attachments:

- Letter from City of Pleasant Hill City Manager to ABAG and MTC dated January 30, 2012
- Letter from the City of Pleasant Hill Mayor to ABAG and MTC, dated May 17, 2011
- Letter from the City of Pleasant Hill to ABAG for Priority Development Area Modifications, dated December 20, 2011

CC: City Council
Planning Commission
City Attorney
City Planner
City Engineer
File



City of Pleasant Hill

January 30, 2012

Ms. Adrienne J. Tissier, Chair
Metropolitan Transportation Commission
Joseph P. Bort MetroCenter
101 Eighth Street
Oakland, CA 94607

Mr. Mark Green, Chair
Association of Bay Area Governments
PO Box 2050
Oakland, CA 94607

SUBJECT: City of Pleasant Hill Comment Letter - Sustainable Communities Strategies (SCS)
– Alternate Scenarios

Dear Ms. Tissier and Mr. Green:

Please consider the following comments regarding the latest Alternative Scenario projections released by the Association of Bay Area Governments (ABAG) and the Metropolitan Transportation Commission (MTC). As previously stated in our May 17, 2011 correspondence (attached), and more recently in correspondence dated December 20, 2011 (attached), the City is concerned that projections for household and employment growth in Pleasant Hill being made in the Sustainable Communities Strategies (SCS) planning process substantially exceed the amount of growth the City anticipates will occur as envisioned in our General Plan and based on various other City physical constraints.

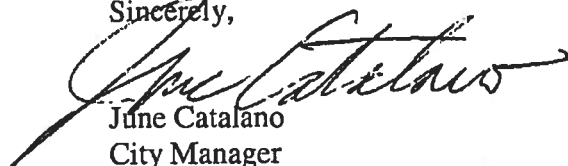
While the Core Concentration Scenario projects a reduction in overall employment growth during the planning period to 266 (from an increase of more than 5,000 in the Initial Vision scenario), overall household growth is projected to increase by more than 700 over the Initial Vision scenario's projections resulting in a projected increase of 3,362 households by 2040. The other three Alternative Scenarios all include significantly higher growth projections for both households and employment when compared to the projections contained in the Initial Vision scenario. Consequently, the City remains very concerned that the growth projections being generated by the SCS planning process remain unrealistic and inconsistent with our General Plan.

The City remains supportive of the goals of the SCS process provided that our concerns over growth projections for households and employment are adequately addressed.

January 30, 2012
Page 2

If you have any questions please contact me at (925) 671-5204 or through email at jcatalano@ci.pleasant-hill.ca.us.

Sincerely,



June Catalano
City Manager

Attachments - Letter from the City of Pleasant Hill Mayor to ABAG and MTC, dated May 17, 2011 and Letter from the City of Pleasant Hill to ABAG for Priority Development Area Modifications, dated December 20, 2011

CC: City Council
Planning Commission
City Manager
City Attorney
City Engineer
File



City of Pleasant Hill

December 20, 2011

Kenneth Kirkey, Planning Director
Association of Bay Area Governments
Joseph P. Bort MetroCenter
101 Eighth Street
Oakland, CA 94604

SUBJECT: Priority Development Area Modification – Diablo Valley College Bus Transit Center and Buskirk Avenue Corridor, Pleasant Hill, CA

Dear Mr. Kirkey:

The City has recently concluded a review of the boundaries of its two existing Priority Development Areas (PDA's) located at the Diablo Valley College Bus Transit Center and within the Buskirk Avenue Corridor. The purpose of conducting this review was to ensure that the PDA boundaries more accurately reflect, and take into consideration, existing adopted City land use and planning maps and documents, including, but not limited to the General Plan Land Use Map, Zoning Map, applicable specific plan boundaries, redevelopment project area boundaries, Housing Opportunity sites, as well as, right-of-way and parcel boundaries. The revised boundaries also exclude existing single family residential neighborhoods that are not contemplated to transition to other uses during the planning period. The PDA boundaries originally established in 2007 were conceptual in nature and, as a result, should not be relied on for SCS scenario planning and/or related employment and household growth projections. Please provide the attached revised PDA boundary maps to the appropriate staff in your organization so that they can be referenced as the SCS process goes forward. Please also note that the City continues to be concerned that the projections for household and employment growth being made by the SCS team substantially exceed the amount of growth the City anticipates will occur as envisioned in our General Plan and based on constraints noted in our May 17, 2011 correspondence (attached) commenting on the Initial Vision Scenario.

Further information regarding the PDA boundary revisions is included in the attached applications which we are providing to you in the event that they are needed for your records. Also please note that the overall vision and place type for both PDA areas are unchanged from when both were first designated as PDA's.

The revised PDA boundaries have been reviewed and approved by both our Planning Commission and our City Council (see attached resolutions and exhibits).

December 20, 2011
Page 2

If you have any questions please contact me at (925) 671-5213 or through email at gfuz@ci.pleasant-hill.ca.us.

Sincerely,



Greg Fuz
City Planner

Attachments:

- A Letter from the City of Pleasant Hill Mayor to the ABAG, MTC and BAAQMD, dated May 17, 2011
- B City Council Resolutions of Support for PDA Modifications, including Proposed Modified Priority Development Area boundaries (both PDA's)
- C Planning Commission Resolutions of Support for PDA Modifications (both PDA's)
- D Amended FOCUS Priority Development Area Applications (both PDA's)

CC: City Council
Planning Commission
City Manager
City Attorney
City Engineer
File



City of Pleasant Hill

May 17, 2011

Ms. Adrienne J. Tissier, Chair
Metropolitan Transportation Commission
Joseph P. Bort MetroCenter
101 Eighth Street
Oakland, CA 94607-4770

Mr. Mark Green, Chair
Association of Bay Area Governments
P.O. Box 2050
Oakland, CA 94607-4756

Subject: Comments on the "Initial Vision Scenario"

Dear Ms. Tissier and Mr. Green:

On behalf of the City Council, please consider the following comments regarding the Initial Vision Scenario ("IVS") that has been prepared as an initial step in the process of identifying a "Preferred Scenario" for the Sustainable Communities Strategy.

The City believes that the IVS assumes an unrealistic level of future household and employment growth for the City, particularly for our two Priority Development Areas ("PDA"s) inconsistent with the future land use pattern for these sites envisioned in the City's General Plan. The IVS indicates that Pleasant Hill will add 2,614 households and 5,333 jobs between now and 2035, primarily within two PDA's centered on the Diablo Valley College Transit Center and the Buskirk Avenue corridor. These two PDA's include areas where the City does have plans for new development and the place types envisioned by the City for these areas are consistent with the mixed use, transit oriented place types indicated in the IVS for these areas. However, the density and intensity of development contemplated in the IVS for these areas far exceeds the planned or realistic capacity of these sites to accommodate new development.

Specifically, the size of the area assumed to be available for new development is overstated, particularly for the Buskirk Avenue corridor PDA. Significant physical and regulatory constraints on development in these two areas are not appropriately taken into consideration (e.g. the Diablo Valley College Transit Center PDA is located to a large extent within the Buchanan Airport Safety Zone limiting potential increases in population density, intensity and structure height within portions of the PDA). The Buskirk Avenue corridor includes several established single family residential neighborhoods which are unlikely to change within the 25 year planning period for the IVS to accommodate new development envisioned in the IVS. Finally, the

Comments on IVS
May 17, 2011
Page 2

maximum allowable densities and intensities of development for these PDA areas pursuant to the City's General Plan, Zoning Ordinance, Redevelopment Plan and applicable Specific Plan(s) are orders of magnitude lower than what is envisioned in the IVS. For example, the City's existing adopted Redevelopment Plan for the Diablo Valley Shopping Center (the primary developable area within that PDA), envisions a potential maximum of 300 dwelling units for that site while the IVS assumes 1,215 new households for this PDA.

While the City supports the goals of the SCS process, we believe that the "Preferred Scenario" that will ultimately be selected for the SCS must consider the realistic capacity of our community to accommodate new growth and be more closely aligned with the City's future plans for these areas. The City also concurs with the concerns raised by the Contra Costa Transportation Authority in its April 26, 2011 correspondence to your agencies and we look forward to participating in the eventual development of a "Preferred Scenario" that can achieve the policy goals of the SCS while respecting the future vision for our community expressed by its residents through the City's General Plan.

Sincerely,



David E. Durant
Mayor

Cc: City Council
Planning Commission
City Manager



METROPOLITAN
TRANSPORTATION
COMMISSION



Association of
Bay Area Governments

Joseph P. Bort MetroCenter
101 Eighth Street
Oakland, CA 94607

Phone: 510.817.5700
TDD/TTY: 510.817.5769
Fax: 510.817.5848
E-mail: info@mtc.ca.gov

Phone: 510.464.7900
E-mail: info@abag.ca.gov

May 2, 2012

Ms. Tina Wehrmeister
Community Development Director
City of Antioch
P.O. Box 5007
Antioch, CA 94531-5007

RE: Comments on Plan Bay Area

Dear Ms. Wehrmeister:

Thank you for your correspondence dated 4/17/2012 to us concerning the Plan Bay Area Jobs-Housing Scenario and Transportation Investment Strategy.

Your comments will be presented to ABAG and MTC board members. Since the inception of Plan Bay Area, we have received numerous letters such as yours with detailed and thoughtful comments. ABAG and MTC staffs will present recommendations on a Preferred Scenario at a joint MTC Planning and ABAG Administrative Committee meeting on May 11, 2012.

Both agencies will meet jointly again on May 17 to approve a final Preferred Scenario. This will provide the basis for a draft Sustainable Communities Strategy (SCS) which will undergo an environmental assessment through the remainder of the calendar year. The draft SCS will be released at the end of this year, with adoption of a final SCS slated for April 2013.

We appreciate your concerns and suggestions. The outcome of this major planning effort will be better thanks to your participation.

Sincerely,

A handwritten signature in black ink, appearing to read 'Doug Kimsey'.

Doug Kimsey
Planning Director
Metropolitan Transportation Commission

A handwritten signature in black ink, appearing to read 'Kenneth Kirkey'.

Kenneth Kirkey
Planning Director
Association of Bay Area Governments



#13

April 17, 2012

RECEIVED
APR 19 2012
MTC

Ms. Adrienne J. Tissier, Chair
Metropolitan Transportation Commission
101 Eighth Street
Oakland, CA 94607

Mr. Mark Luce, President
Association of Bay Area Governments
Center P.O. Box 2050
Oakland, CA 94607

**Re: Comments on the Draft Jobs-Housing Connection Scenario and
Transportation Investment Strategy**

Dear Ms. Tissier and Mr. Green:

Thank you for the opportunity to comment on the Jobs-Housing Connection Scenario and Transportation Investment Strategy. These documents will become Plan Bay Area 2040, serving as the Bay Area's Sustainable Communities Strategy (SCS) required by SB 375. The overarching goal of SB 375 is to reduce greenhouse gas emissions by integrating transportation and land use planning.

As an additional means of reducing greenhouse gas emissions, the City has previously stated that it would support a SCS that shows future job growth in areas that are already "housing rich" which will reduce commute times. The Jobs-Housing Connection Scenario, while projecting more employment in Antioch than the previous draft alternative scenarios, continues to show employment numbers that are far less than assumed in the Antioch General Plan and Hillcrest Station Area Specific Plan. The Transportation Investment Strategy should seriously consider incentives to locate jobs in housing rich areas in order to address the current 6% gap in target greenhouse emissions reductions.

It is my understanding that MTC is proposing a requirement to comply with the Complete Streets Act by October 1, 2012 in order to qualify for funding under the One Bay Area Grant Program. The time required to complete an ordinance or General Plan update to comply with the Act, including drafting policy, soliciting public input, and required public hearings, will make meeting this deadline nearly impossible. There is no objection to meeting the requirements of the Act, rather to the imposed deadline in order to compete for transportation funding. I urge MTC to reconsider the timing of this requirement.

April 17, 2012

#13

Re: **Comments on the Draft Jobs-Housing Connection Scenario and
Transportation Investment Strategy**

Again, thank you for the opportunity to comment on the Jobs-Housing Connection Scenario and Transportation Investment Strategy. I am available to discuss the City's position with ABAG and MTC staff and can be reached at 925.779.7038 or twehrmeister@ci.antioch.ca.us.

Sincerely,



Tina Wehrmeister
Community Development Director

cc: City Council
Planning Commission
Jim Jakel, City Manager
Mindy Gentry, Senior Planner
Ezra Rapport, ABAG
Ken Kirkey, ABAG
Steve Heminger, MTC
Doug Kimsey, MTC



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Association of
Bay Area Governments

Joseph P. Bort MetroCenter
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Oakland, CA 94607

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Fax: 510.817.5848
E-mail: info@mtc.ca.gov

Phone: 510.464.7900
E-mail: info@abag.ca.gov

May 3, 2012

Ms. Karen Kristiansson
Consultant
Spangle Associates (for Town of Portola Valley)
770 Menlo Ave., Suite 200
San Rafael, CA 94025-4736

RE: Comments on Plan Bay Area

Dear Ms. Kristiansson:

Thank you for your correspondence dated April 17, 2012, to Athena Ullah concerning the Plan Bay Area Jobs-Housing Connection Scenario and Transportation Investment Strategy.

Your comments will be presented to ABAG and MTC board members. Since the inception of Plan Bay Area, we have received numerous letters such as yours with detailed and thoughtful comments. ABAG and MTC staffs will present recommendations on a Preferred Scenario at a joint MTC Planning and ABAG Administrative Committee meeting on May 11, 2012.

Both agencies will meet jointly again on May 17 to approve a final Preferred Scenario. This will provide the basis for a draft Sustainable Communities Strategy (SCS) which will undergo an environmental assessment through the remainder of the calendar year. The draft SCS will be released at the end of this year, with adoption of a final SCS slated for April 2013.

We appreciate your concerns and suggestions. The outcome of this major planning effort will be better thanks to your participation.

Sincerely,

Doug Kimsey
Planning Director
Metropolitan Transportation Commission

Kenneth Kirkey
Planning Director
Association of Bay Area Governments

From: "Karen Kristiansson" <kristiansson@spangleassociates.com>
To: <AthenaU@abag.ca.gov>
Date: 4/17/2012 12:46 PM
Subject: RE: [San Mateo County] Update on Jobs-Housing Connection Scenario

Hi Athena—

Below are responses to the five survey questions you sent us for the Town of Portola Valley. We will get you some formal comments as well, but not until the end of next week in order to give the town council more time to review the new scenario.

1. Please provide your thoughts on the job and housing distribution methodologies utilized in the Jobs – Housing Connection Scenario (see Appendix, *Jobs-Housing Connection Scenario Draft Report*: [http://www.onebayarea.org/pdf/SCS Preferred Scenario Jobs Housing Connection 3-9-12.pdf](http://www.onebayarea.org/pdf/SCS_PREFERRED_Scenario_Jobs_Housing_Connection_3-9-12.pdf))

These distributions methodologies are complex and seem to address many of the concerns that have been expressed about the process. The one problem I have with the methodologies is that they do not always seem to adequately reflect local conditions and concerns.

2. Please provide any feedback on the housing and job growth distributions to your PDAs and your jurisdiction.

The housing distribution for Portola Valley appears to be reasonable given the context. The job growth distribution, however, is much higher than (more than double) local projections. Some possible reasons could be that a nearby retail and office center in the unincorporated county could have been included with the town's numbers, or the model may include some land that is incorrectly shown for retail or office use. The town's letter of January 16 explains in detail how the town's job growth estimates were calculated.

3. Please review the data used to construct the distributions and provide any corrections. In particular, provide any corrections to the following data in the Jobs-Housing Connection Housing Distribution Details spreadsheet (provided):

1. Local PDA Housing Unit Growth: column S ("All Areas" worksheet)

No comments—Portola Valley doesn't have any PDAs.

2. Local Jurisdiction Housing Unit Growth: column H ("Jurisdictions" worksheet)

This shows 240 units over 30 years, which is somewhat high but could be possible under certain circumstances.

4. Do you believe that with this scenario your local jurisdiction can advance the goals and principles of the Sustainable Communities strategy?

Yes.

5. Additional Comments?

- a) The overall employment growth numbers, especially the amount of employment growth projected for 2010-2020, for the Bay Area still appear high given the recession.
- b) The model has come a long way in terms of addressing employment locations as well as housing, but more could be done to increase employment density near transit, especially since employment density has been shown to have a greater effect on transit use than residential density.

Thanks for asking!

Karen



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Association of
Bay Area Governments

Joseph P. Bort MetroCenter
101 Eighth Street
Oakland, CA 94607

Phone: 510.817.5700
TDD/TTY: 510.817.5769
Fax: 510.817.5848
E-mail: info@mtc.ca.gov

Phone: 510.464.7900
E-mail: info@abag.ca.gov

May 2, 2012

Mayor Carla Small
Town of Ross
P.O. Box 320
Ross, CA 94957-0320

RE: Comments on Plan Bay Area

Dear Mayor Small:

Thank you for your correspondence dated 4/17/2012 to us concerning the Plan Bay Area Jobs-Housing Scenario and Transportation Investment Strategy.

Your comments will be presented to ABAG and MTC board members. Since the inception of Plan Bay Area, we have received numerous letters such as yours with detailed and thoughtful comments. ABAG and MTC staffs will present recommendations on a Preferred Scenario at a joint MTC Planning and ABAG Administrative Committee meeting on May 11, 2012.

Both agencies will meet jointly again on May 17 to approve a final Preferred Scenario. This will provide the basis for a draft Sustainable Communities Strategy (SCS) which will undergo an environmental assessment through the remainder of the calendar year. The draft SCS will be released at the end of this year, with adoption of a final SCS slated for April 2013.

We appreciate your concerns and suggestions. The outcome of this major planning effort will be better thanks to your participation.

Sincerely,

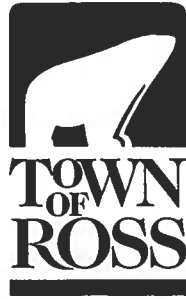
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Doug Kimsey
Planning Director
Metropolitan Transportation Commission

A handwritten signature in black ink, appearing to read 'Kenneth Kirkey'.

Kenneth Kirkey
Planning Director
Association of Bay Area Governments

Steve. Ann. Doug K.



P.1

#15

April 17, 2012

RECEIVED

APR 18 2012

MTC

Mark Luce, President, Board of Directors
Association of Bay Area Governments PO Box 2050
Oakland, CA 94604-2050

Adrienne Tessier, Chair
Metropolitan Transportation Commission
101 Eighth Street
Oakland, CA 94607

RE: One Bay Area Sustainable Communities Strategy Jobs Housing Connection Scenario

Dear Mr. Luce and Ms. Tessier:

This letter is in response to your request for feedback on the March 2012 *Jobs-Housing Connection Scenario*. We hope you will consider the opportunities and constraints associated with development of new housing in the Town of Ross prior to adopting a final Sustainable Communities Strategy (SCS).

The *Jobs-Housing Connection Scenario* estimates 80 new housing units in the Town of Ross over the next 30 years. This far exceeds the growth this small Town has experienced over the past 30 years. The most recent SCS scenarios do not take into account available land inventory or constraints on that land and they overestimate the housing units that will actually be developed in Ross.

The Town of Ross is small and built out. The Town was incorporated in 1908. The existing 840 housing units in Ross were built when land was available for development and subdivision. Half of the 52 new houses, 2nd units and guesthouses built in Ross over the last 30 years were built on vacant lots. Fewer than 30 vacant lots remain, and these pose a challenge for development due to environmental constraints, such a steep topography (80% slopes), limited water supply for firefighting, and access issues. The Town will not develop housing units at a rate equal to development in the past, as the land area available for development decreased as those units were developed and sensitive hillside areas were protected.

Houses continue to be re-developed within Ross despite the economic downturn. However, new housing units are limited and primarily created in the form of second units. The Town has reduced constraints and increased incentives for development of new units within the developed areas of our community as much as feasible without changing our historic character as a single-family community. To accommodate the projected growth, the Town would have to rezone parks or developed single-family house sites (some of which are historic) for higher

density housing. This would conflict with the zoning the community has had in place for the past 100 years.

We are unclear how the House Hold Vacancy Absorption numbers will factor in to the projections for the Town of Ross. Our community does have a number of second homes that may not be available to absorb SCS projected households. We hope any adjustments to the methodologies do not further increase the households projected for Ross.

We are pleased that ABAG and MTC have committed to a peer review of the overall growth projections for Marin County. We question the 510 existing jobs identified in the report and the 110 jobs predicted by 2040 for Ross. The Town has a very small, built-out, downtown commercial area. The commercial development is so low that the Town supports government services with an annual parcel tax on residential sites. The primary employers are the Town (approximately 25 employees), public grade school (359 students in 2010-2011), private high school (limited by code to 321 students) and a residence for the developmentally disabled. These top four employers together employ only 200 full and part time people. Staff contacted each "major" employer and they do not anticipate any notable growth in the next 30 years.

The Town of Ross is committed to assist in the region's efforts to reduce greenhouse gas emissions from automobiles and light trucks. The Town has an adopted Climate Action Plan and has an adopted housing element that proposes new development within existing developed areas. Nearly all residences in the Town are within a mile of frequent and reliable transit as well as a bicycle and pedestrian paths that connect the community with adjacent communities.

The Town of Ross encourages the development of a Sustainable Community Strategy that recognizes constraints to land development as well as the important environmental factors that also contribute to sustainable communities including protection of open space, watersheds, parks, and water supply.

Thank you for the opportunity to provide comment.

Sincerely,

ROSS TOWN COUNCIL



Carla Small, Mayor
Scot Hunter
Chris Martin
P. Rupert Russell
Rick Strauss

Cc: Ezra Rappaport, Executive Director, ABAG
Steve Heminger, Executive Director, MTC
Marin County Supervisor Susan Adams



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Association of
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Joseph P. Bort MetroCenter
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Fax: 510.817.5848
E-mail: info@mtc.ca.gov

Phone: 510.464.7900
E-mail: info@abag.ca.gov

May 2, 2012

Mr. Paul Jensen
Community Development Director
City of San Rafael
P.O. Box 151560
San Rafael, CA 94915-1560

RE: Comments on Plan Bay Area

Dear Mr. Jensen:

Thank you for your correspondence dated 4/17/2012 to Ezra Rapport concerning the Plan Bay Area Jobs-Housing Scenario and Transportation Investment Strategy.

Your comments will be presented to ABAG and MTC board members. Since the inception of Plan Bay Area, we have received numerous letters such as yours with detailed and thoughtful comments. ABAG and MTC staffs will present recommendations on a Preferred Scenario at a joint MTC Planning and ABAG Administrative Committee meeting on May 11, 2012.

Both agencies will meet jointly again on May 17 to approve a final Preferred Scenario. This will provide the basis for a draft Sustainable Communities Strategy (SCS) which will undergo an environmental assessment through the remainder of the calendar year. The draft SCS will be released at the end of this year, with adoption of a final SCS slated for April 2013.

We appreciate your concerns and suggestions. The outcome of this major planning effort will be better thanks to your participation.

Sincerely,

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Doug Kimsey
Planning Director
Metropolitan Transportation Commission

A handwritten signature in black ink, appearing to read 'Kenneth Kirkey'.

Kenneth Kirkey
Planning Director
Association of Bay Area Governments



#16

MAYOR GARY O. PHILLIPS
COUNCILMEMBER DAMON CONNOLLY
COUNCILMEMBER BARBARA HELLER
COUNCILMEMBER MARC LEVINE
COUNCILMEMBER ANDREW CUYUGAN MCCULLOUGH

COMMUNITY DEVELOPMENT DEPARTMENT

PHONE: 415-485-3085

FAX: 415-485-3184

April 17, 2012

Ezra Rapport
Executive Director
Association of Bay Area Governments
P.O. Box 2050
Oakland, CA 94604-2050

SUBJECT: Bay Area Sustainable Communities Strategy (SCS); Review and Comments on Draft Preferred "Jobs-Housing Connection Scenario" (City File No. P09-019)

Dear Mr. Rapport:

Thank you for the opportunity to comment on the Draft Preferred "Jobs-Housing Connection Scenario" (Draft Preferred Scenario) prepared for the One Bay Area Plan process. Our last correspondence to you on the SCS and One Bay Area Plan (January 26, 2012) focused our comments on the "Alternative Scenarios." In that letter, we expressed serious concerns about the jobs projections and reported that San Rafael does not have the adequate transportation infrastructure to support the collective housing and job projection numbers. Even though San Rafael has chosen to designate two Priority Development Areas (PDA), we commented that the projection numbers appeared to be impractical and inequitable. Lastly, we questioned the methodology that was used to develop the projections, particularly in consideration of built-out community conditions and the current 20% vacancy in our office space inventory.

We have reviewed the latest Draft Preferred Scenario and have found that further adjustments have been made to the 2040 jobs and housing projections from those presented in the Alternative Scenarios. While we acknowledge that some changes have been made in the projections, we respectfully submit the following comments on the Draft Preferred Scenario:

1. Jobs projections have been reduced but are still unrealistic. The projections for jobs through 2040 have been substantially reduced from the projections presented in the Alternative Scenarios. We acknowledge that this scenario takes into account: a) "recession recovery," meaning that a percentage of jobs lost resulting from the current economic recession will be recreated to fill the current, experienced office vacancy; and b) some level of growth over time in home-based businesses. While these factors help to better understand the method for these projections, we continue to have concerns and reservations that a projection of 6,190 new jobs by 2040 is realistic by comparison to the job growth experienced in San Rafael between 1995 and 2010. Even assuming recession recovery and an increase in home-based businesses, the adjusted projection would still equate to several million square feet in new commercial building area, which

is far more than that planned by our current, San Rafael General Plan 2020. This additional commercial building area would require major transportation and utility service infrastructure that exceeds current and planned capacity.


2. Housing projections have been adjusted and re-distributed. For the Draft Preferred Scenario, the housing projections for Marin County have been adjusted for most cities/towns. The housing projections for San Rafael are about the same as the lower-range projections presented in the Alternative Scenarios (projection of 2,820 housing units). This projection corresponds with the recently released draft Regional Housing Need Allocation (RHNA) for San Rafael, which is 898 units for the RHNA next cycle (2014-2022). This RHNA allocation represents 30% of the SCS projection for 2040. As is the case with the jobs projections, we question the ability to provide adequate transportation and utility service for this 2040 projection.
3. Peer review of projections methodology is needed. The City of San Rafael is represented by the Transportation Authority of Marin (TAM). By separate letter, the TAM Board of Director's submitted comments to ABAG. The City of San Rafael fully supports the TAM recommendation to ABAG that a peer review of the projections methodology be performed by the Bay Area Council Economic Institute. The peer review of the projections methodology should consider the individual conditions and characteristics of each county in the Bay Area region to determine if the projections are justified and supportable. For example, for Marin County, the jobs and housing projections are lower than other counties, which we assume is attributed to several factors including: a) the high amount of protected lands and designated Priority Conservation Areas in this county; b) the limited amount of regional-serving mass transit; and c) the high projections for an aging population. These and other factors need to be considered in assessing and confirming the projections methodology.
4. GHG emissions reduction target goals and alternative policies. As was the case with the Alternative Scenarios, the Draft Preferred Scenario would not meet the minimum goal of reducing GHG emissions for the Bay Area by 15%. It is estimated that the implementation of the Draft Preferred Scenario would reduce GHG emissions by approximately 9%, meaning that in order to reach the 15% target, other non-land use policies will have to be implemented. Policy incentives have been published with this scenario indicate that implementation of measures such as vanpool incentives, telecommuting, safe routes to schools/pedestrian networking will augment the reduction in GHG emissions in order to meet the 15% target goal.

Regarding the GHG emission target goal, please note that the City of San Rafael has adopted a Climate Change Action Plan (CCAP- 2009) and a Greenhouse Gas Emission Reduction Strategy (2011), which both address our local commitment to implementing similar policies and measures to reduce GHG emissions for 2020 and 2035. These measures include, among others: improving the pedestrian/bicycle infrastructure (NTPP); promoting transient-oriented development (TODs); and supporting transit services as well as the SMART station planning, which would increase the performance and safety of public transit, bicycle and pedestrian facilities. In addition, the City has committed to participate in the local Marin Energy Authority (MEA) alternative to conventional PG &E service. MEA offers renewable energy with service options at several levels, light green and dark green. San Rafael has committed to receive the

MEA light green service option with a later, more aggressive commitment for the dark green service option by 2020. Lastly, the CCAP implementation program includes other measures that would reduce GHG emissions including the adoption of a Zero Waste Plan, developing a Residential Food Waste Composting Program, and measures for promoting electrical vehicle purchase and use. With the implementation of these measures, our GHG Emissions Reduction Strategy estimates that our annual emissions can be reduced by as much as 56,858 MTCO₂e by 2020 and 78,382 MTCO₂e by 2035. This local effort should be provided credit to further support reductions in the jobs-housing connection projections for our community.

We appreciate the opportunity to review and comment on the Draft Preferred Scenario. We will continue to monitor the SCS process and look forward to reviewing future documents when it is completed and published and available for public review.

Sincerely,



Paul A. Jensen, AICP
Community Development Director

cc: Mayor and City Council
Planning Commission
City Manager
City Attorney
Public Works Director
Economic Development Director
Transportation Authority of Marin



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E-mail: info@mtc.ca.gov

Phone: 510.464.7900
E-mail: info@abag.ca.gov

May 3, 2012

Tri-Valley Cities Councils:

Candace Andersen, Mayor, Town of Danville
Tim Sbranti, Mayor, City of Dublin
John Marchand, Mayor, City of Livermore
Jennifer Hosterman, Mayor, City of Pleasanton
and Bill Clarkson, Mayor, City of San Ramon

RE: Comments on Plan Bay Area

Dear Mayors:

Thank you for your correspondence dated April 17, 2012, to our agencies concerning the Plan Bay Area Jobs-Housing Connection Scenario and Transportation Investment Strategy.

Your comments will be presented to ABAG and MTC board members. Since the inception of Plan Bay Area, we have received numerous letters such as yours with detailed and thoughtful comments. ABAG and MTC staffs will present recommendations on a Preferred Scenario at a joint MTC Planning and ABAG Administrative Committee meeting on May 11, 2012.

Both agencies will meet jointly again on May 17 to approve a final Preferred Scenario. This will provide the basis for a draft Sustainable Communities Strategy (SCS) which will undergo an environmental assessment through the remainder of the calendar year. The draft SCS will be released at the end of this year, with adoption of a final SCS slated for April 2013.

We appreciate your concerns and suggestions. The outcome of this major planning effort will be better thanks to your participation.

Sincerely,

Doug Kimsey
Planning Director
Metropolitan Transportation Commission

Kenneth Kirkey
Planning Director
Association of Bay Area Governments

April 17, 2012

Mr. Steve Heminger
Executive Director
Metropolitan Transportation Commission
Joseph P. Bort MetroCenter
101 8th Street
Oakland, CA 94607-4756

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APR 23 2012

EXECUTIVE DIRECTOR

Mr. Ezra Rapport
Executive Director
Association of Bay Area Governments
Joseph P. Bort MetroCenter
101 8th Street
Oakland, CA 94607-4756



RE: Sustainable Communities Strategy

Dear Mr. Heminger and Mr. Rapport:

On behalf of the Tri-Valley Cities Councils, we appreciate the opportunity to provide comments on the Sustainable Communities Strategy (SCS) process and the proposed preferred scenario, the Jobs Housing Connection. While each jurisdiction may elect to separately forward specific comments regarding local land uses and transportation issues, there are several common concerns which need to be considered in approving a preferred scenario.

Developing land uses consistent with and in support of the targets of the SCS will require substantial commitments of local staff and financial resources. Planning studies and environmental review must be completed for PDAs and other infill areas, infrastructure improvements will most likely be needed to support development beyond what is currently included in local General Plans, and community engagement at a local level will be a critical, on-going component for the successful implementation of the SCS. Considering that local governments' finances are already strained, the identification and provision of additional funding sources, to offset costs incurred for both planning and implementation phases (i.e., for new and upgraded infrastructure to support growth in the PDAs), should be included in the SCS.

Over the past few years, each of the regional agencies, following its own mandate, has established policies and regulations in regard to development that can have significant impacts on the costs of infill development. For example, the Regional Water Quality Control Board has previously adopted standards on impervious surfaces and non-point source pollutants and the Regional Transportation Plan establishes, through its

guidelines how and where funding will be available for transportation improvements. Taken in isolation, each agency promotes critical governmental objectives; but in totality, they contribute to increasing complexity and uncertainty for the development type there is collective interest in promoting, i.e., higher density commercial and residential infill development within, and surrounding, historic core areas. These regional regulations can have the unintended consequence of further impeding infill development that already faces numerous hurdles not faced by a greenfield project including, but not limited to, nearby unhappy neighbors, highly uncertain site conditions, and unique design requirements.

SB 375 provides an opportunity for the region to harmonize and standardize its requirements and to identify regional strategies that in combination can encourage infill development. The Environmental Impact Report (EIR) for the SCS and the analysis leading up to it are an unprecedented opportunity to consider how regional policies and mitigations can be harmonized and restructured to help even the playing field for infill development. We urge, that as the regional agencies gear up for the EIR for the SCS, that they commit sufficient resources to undertake the larger effort needed to work together to consider how they can make it easier – not harder – for infill development to occur.

Development of the SCS has brought forward a number of other issues that have been considered impediments to the development patterns we wish to encourage, but that remain unaddressed year after year. Among them are:

- Fiscalization of land use. So long as there are significant fiscal benefits from commercial/retail development, and significant long-term costs associated with residential development (and especially rental housing buildings that generally sell and are reassessed less often than single family homes), the promotion of appropriate development patterns will continue to face an uphill fiscal battle.
- Transit availability. The SCS and the PDA's that will be the foundation of the SCS necessarily must rely on transit "nodes" as the basis for meeting housing needs. In order for developers and communities to invest in those locations, there is a need for certainty that the transit will be there for the long term, and that the service will be adequate to address the demands placed on it. Meanwhile, over the past few years that certainty has been undermined by cutbacks on funding for transit. Investments in existing and future transit improvements need to get the very biggest land-use "bang for the buck". MTC's station area planning guidelines are a good step, but the assessments of all future transit improvements need to be considered in light of implementing the land uses of the Sustainable Communities Strategy and especially the very high intensity land uses that will ultimately be needed to address regional housing needs in a sustainable manner. Furthermore, it is important to align ABAG's internal processes such that a community is encouraged to pursue the formation of PDAs to create the land-use foundations for compact development – rather

than discouraged from doing so based on infrequent availability of transit services, a condition which the community has little or no influence on.

None of these are new issues. While the SCS alone may not be able to address all of them, the SCS must recognize that these obstacles exist and begin to set forth strategies that can ultimately address them for a successful SCS.

In conclusion, we recommend ABAG/MTC begin now to identify the resources that will be made available to implement the SCS and provide incentives to jurisdictions willing to accept higher levels of growth. Also, since the SCS EIR provides an opportunity to harmonize regional policies, guidelines and regulations, ABAG/MTC should commit to overarching goals of enhancing coordination and streamlining the entitlement process to assure that infill development is easier to accomplish than is currently the norm.

We look forward to continuing to work with ABAG and MTC on the development of the Sustainable Communities Strategy.

Regards,



Candace Andersen, Mayor
Town of Danville



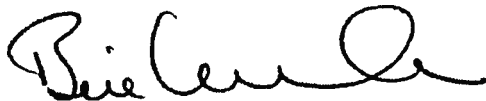
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Bill Clarkson, Mayor
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May 2, 2012

Mr. Andrew Smith
Senior Planner
City of Walnut Creek
1666 North Main Street
Walnut Creek, CA 94596

RE: Comments on Plan Bay Area

Dear Mr. Smith:

Thank you for your correspondence dated 4/17/2012 to Athena Ullah concerning the Plan Bay Area Jobs-Housing Scenario and Transportation Investment Strategy.

Your comments will be presented to ABAG and MTC board members. Since the inception of Plan Bay Area, we have received numerous letters such as yours with detailed and thoughtful comments. ABAG and MTC staffs will present recommendations on a Preferred Scenario at a joint MTC Planning and ABAG Administrative Committee meeting on May 11, 2012.

Both agencies will meet jointly again on May 17 to approve a final Preferred Scenario. This will provide the basis for a draft Sustainable Communities Strategy (SCS) which will undergo an environmental assessment through the remainder of the calendar year. The draft SCS will be released at the end of this year, with adoption of a final SCS slated for April 2013.

We appreciate your concerns and suggestions. The outcome of this major planning effort will be better thanks to your participation.

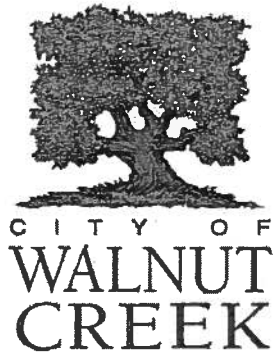
Sincerely,

A handwritten signature in black ink, appearing to read 'Doug Kimsey'.

Doug Kimsey
Planning Director
Metropolitan Transportation Commission

A handwritten signature in black ink, appearing to read 'Kenneth Kirkey'.

Kenneth Kirkey
Planning Director
Association of Bay Area Governments



April 17, 2012

Athena Ullah
Association of Bay Area Governments
P.O. Box 2050
Oakland, CA 94604
Delivered via e-mail: AthenaU@abag.ca.gov

Subject: Comments on the “Jobs-Housing Connection Scenario”

Dear Ms. Ullah,

Thank you for the opportunity to submit comments on the Jobs-Housing Connection Scenario (the “preferred scenario” for the Sustainable Communities Strategy). Unfortunately, however, the Walnut Creek City Council has not been given the opportunity to review and provide comment on the scenario and its associated transportation investment strategy due to our inability to schedule and notice a public meeting before the unreasonably short deadline for comments.

The following is a summary of staff’s comments regarding the Jobs-Housing Connection Scenario (released March 9, 2012) and the associated Plan Bay Area Transportation Investment Strategy (released April 13, 2012 – three business days prior to the April 18th comment deadline). We have provided responses to each of your questions listed in your March 26th message posted on the Basecamp website, as follows:

1. Please provide your thoughts on the job and housing distribution methodologies utilized in the Jobs-Housing Connection Scenario.

Regarding the job distribution methodology, our only comment is that the current (2010) employment figures should primarily be based upon the recently released 2010 Census Bureau LEHD employment data. This count, which comes from data reported by the actual employers, indicates that there were approximately 49,000 primary jobs within Walnut Creek in 2010. This is considerably more than the 41,650 jobs indicated in the Jobs-Housing Connection Scenario, and is approximately the same as the 50,600 jobs indicated in the five alternative scenarios released in September, 2011 and January, 2012.

Regarding the housing distribution methodology, we have two comments:

- a. The Vehicle Miles Traveled (VMT) data used as a weighting factor should be based on the traffic model maintained by the Contra Costa Transportation Authority (with input from the City of Walnut Creek), as this model is much more detailed and accurate at the subregional level than is MTC's Regional Travel Demand Model.
 - b. The Housing Value Factor, which shifts housing growth to places with higher home prices, should be removed from the methodology entirely. The only correlation between home prices and the ability to accommodate more housing (if there is a correlation at all) is that the price of land is inversely proportional to the ability to build new housing due to the increased financial burden of land acquisition. The intent of this factor is to take into account the availability of high quality services (schools, infrastructure, parks, etc.), however the availability of such services is itself largely the result of fiscal, societal, historical, and political factors, and is in no way reflective of a jurisdiction's ability to provide additional housing. In fact, it is often the areas which are most lacking in these services that are located closest to transit.
- 2. Please provide any feedback on the housing and job growth distributions to your PDAs and your jurisdiction.**

The number of housing units and households projected for the year 2040 within the Jobs-Housing Connection Scenario is considerably less than the projections contained in all five of the alternative scenarios released in September, 2011 and January, 2012. ABAG staff has informed City staff that these low numbers are the result of an error, but have not been able to provide corrected numbers for us to review and respond to. If the projected household growth is to be increased, it should not exceed the Focused Growth Scenario that was endorsed by the Walnut Creek City Council at their January 17, 2012 meeting.

The Jobs-Housing Connection Scenario projects that 85 percent of the housing units built within the City by the year 2040 will be built within the City's Priority Development Area (PDA). However, based on our own projections our PDA will only account for approximately 30 percent of the housing units built within the City. A majority of the remainder will be built elsewhere within the City's downtown Core Area (Census Tracts 3390.01 and 3390.02).

The Jobs-Housing Connection Scenario projects that 32 percent of the jobs created within the City by the year 2040 will come from within the City's PDA, however based on our own projections, our PDA will only account for approximately 15 percent of the jobs created within the City.

- 3. Please review the data used to construct the distributions and provide any corrections. In particular, provide any corrections to the following data in the Jobs-Housing Connection Housing Distribution Details spreadsheet:**

a. Local PDA Housing Unit Growth: column S (“All Areas” worksheet)

The West Downtown PDA should grow by approximately 2,100 housing units between the years 2010 and 2040. The remainder of our jurisdiction should grow by approximately 4,900 housing units between the years 2010 and 2040.

b. Local Jurisdiction Housing Unit Growth: column H (“Jurisdictions” worksheet)

Walnut Creek as a whole should grow by approximately 7,000 housing units between the years 2010 and 2040.

4. Do you feel that with this scenario your local jurisdiction can advance the goals and principals of the Sustainable Communities Strategy?

The goals and policies contained within the City of Walnut Creek’s General Plan reflect our City’s decades-long history of intelligent land use and transportation planning, and the City will advance the goals and principals of the Sustainable Communities Strategy regardless of the scenario chosen. However, a scenario that focuses concentrated growth in proximity to transit will do the most to enhance the City’s ability to advance these goals, particularly if additional funding follows.

5. Additional Comments?

With regard to the Plan Bay Area Transportation Investment Strategy component of the Jobs-Housing Connection Scenario, we don’t have a clear understanding of the potential impact of funding used to maintain existing infrastructure. We believe in making an appropriate investment into the infrastructure serving our PDA as a matter of future transportation planning policy; however the shift of transportation funding should be done in a gradual manner to ensure an adequate and fair distribution of funding to the entire transportation network.

The proposed requirement that 70 percent of the funding provided through the Plan Bay Area Transportation Investment Strategy be spent on projects located within or directly serving PDAs will negatively impact the ability of cities and counties to maintain the portions of the existing transportation network that are located outside of a PDA, by focusing an inappropriate amount of funding for what is a very small proportion of the region’s developable land area. This proposed mandate also ignores the fact that there are large PDA-like transit-infill areas that are located outside of the PDAs, and will significantly curtail local jurisdictions’ ability to maintain and expand their transportation infrastructure in a responsible manner.

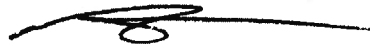
We are also concerned with the added complexity and resources necessary to apply for and receive transportation funding at the local level under this plan. For example, the proposed requirement that cities and counties adopt a complete streets ordinance or general plan amendment by October 1, 2012 in order to qualify for funding under the One Bay Area Grant program imposes an almost impossible mandate to jurisdictions such as ours who have not yet completed these steps. The City has started work to adopt such an

ordinance, but the process of creating law is lengthy, and the October 1st deadline is unrealistic.

We feel that the region's local jurisdictions were not given enough time to have a productive and focused dialogue on this important and complex topic. It is important to provide enough time to ensure that all modes of transportation are fairly and equitably accounted for.

Thank you again for the opportunity to comment on the Jobs-Housing Connection Scenario. The City of Walnut Creek remains committed to the creation of a successful Sustainable Communities Strategy, and we hope that you find our comments helpful and productive. We will continue to be an active participant in the SCS process, and ask that ABAG and MTC continue to work in collaboration with their constituent cities and counties to provide an adequate amount of time for review and comment for all future phases of the SCS process, particularly in light of local jurisdictions' continually dwindling resources.

Sincerely,



Andrew M. Smith
Senior Planner

Cc: Walnut Creek City Council
Ken Nordhoff, City Manager
Sandra Meyer, Community Development Director
Heather Ballenger, Public Services Director
Laura Simpson, Principal Planner
Rafat Raie, Traffic Engineer



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Phone: 510.464.7900
E-mail: info@abag.ca.gov

May 2, 2012

Mayor Cliff Lentz
City of Brisbane
50 Park Place
Brisbane, CA 94005-1310

RE: Comments on Plan Bay Area

Dear Mayor Lentz:

Thank you for your correspondence dated 4/18/2012 to Ken concerning the Plan Bay Area Jobs-Housing Scenario and Transportation Investment Strategy.

Your comments will be presented to ABAG and MTC board members. Since the inception of Plan Bay Area, we have received numerous letters such as yours with detailed and thoughtful comments. ABAG and MTC staffs will present recommendations on a Preferred Scenario at a joint MTC Planning and ABAG Administrative Committee meeting on May 11, 2012.

Both agencies will meet jointly again on May 17 to approve a final Preferred Scenario. This will provide the basis for a draft Sustainable Communities Strategy (SCS) which will undergo an environmental assessment through the remainder of the calendar year. The draft SCS will be released at the end of this year, with adoption of a final SCS slated for April 2013.

We appreciate your concerns and suggestions. The outcome of this major planning effort will be better thanks to your participation.

Sincerely,

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Doug Kimsey
Planning Director
Metropolitan Transportation Commission

A handwritten signature in black ink, appearing to read 'Ken Kirkey'.

Kenneth Kirkey
Planning Director
Association of Bay Area Governments



CITY OF BRISBANE

50 Park Place
Brisbane, California 94005-1310
(415) 508-2100
Fax (415) 467-4989

April 18, 2012

Ken Kirkey
Association of Bay Area Governments
P.O. Box 2050.
Oakland, CA 94604-2050

Re: SCS- Jobs-Housing Connection Scenario

Dear Mr. Kirkey:

Thank you for the opportunity to comment on the above-referenced document. We appreciate the importance of regional efforts to address transportation- related emissions and housing, and recognize the complexity of the task. ABAG's efforts in working in partnership with local jurisdictions in these efforts are noted and appreciated.

In regard to the Jobs-Housing Connection Scenario and the preferred scenario to be designated for EIR analysis by ABAG/MTC the City of Brisbane offers the following comments:

1. The preferred scenario should include no residential units within the Brisbane portion of the Bi-County PDA. The Brisbane portion of the PDA encompasses the Brisbane Baylands Specific Plan area. The Brisbane General Plan currently prohibits residential development within the Brisbane Baylands, based primarily on safety and community character considerations. The City of Brisbane is currently engaged in an extensive planning and environmental review process evaluating multiple land use scenarios for the Baylands, one of which includes a significant residential component and others which do not. The City anticipates this planning process will not culminate in a final land use decision until 2014 at the earliest. It would be inappropriate and premature for the preferred SCS to assume that any amount of housing will be approved through the City's planning process, and strongly urges the SCS to reflect the City's adopted General Plan and the existing prohibition of housing within the Brisbane Baylands. The City appreciates ABAG's assurances that the SCS process will not usurp local land use control, but the inclusion of a residential component within the Brisbane Baylands could be perceived as an attempt to unduly pressure the City's independent planning process before the required environmental and public review process has been completed.

The City would further note that the Bi-County PDA is unique in that it encompasses adjacent properties within two jurisdictions that are being planned to function as an integrated place. Given the amount of residential development approved with the San Francisco portion of the PDA, the PDA as a whole will function as a vital and active mixed use center with jobs and housing in close proximity to transit, irrespective of the precise arrangement of land uses by jurisdiction.

2. The City concurs with the Non-PDA housing projections for Brisbane as set forth in the Jobs-Housing Connection Scenario. Given the City's limited developable land base, relatively poor access

to transit, and open space lands which provide regionally important recreation opportunities as well as protected habitat for federally-listed endangered species, the growth projections for 250 additional housing units by 2040 are realistic and appropriate.

3. The City concurs with the PDA and Non-PDA employment projections for Brisbane as set forth in the Jobs-Housing Connection Scenario. The City would note that market forces far beyond the City's control will ultimately drive future employment. Additionally, the loss of redevelopment as a tool to finance transportation, transit and infrastructure to accommodate future employment growth could be a significant constraint to the City's ability to accommodate the levels of projected employment. The City looks forward to working with regional entities such as ABAG and MTC to help overcome these obstacles.

Lastly, the City recognizes that the SCS will need to be revisited in several years, and we look forward to working with ABAG to ensure that the results of the City's planning process for the Brisbane Baylands PDA are incorporated into future iterations of the SCS to ensure that the City's land use patterns and policies help the region achieve its environmental and sustainability goals pursuant to SB 375.

Thank you for your consideration in this matter. Please contact John Swiecki, Brisbane Community Development Director at 415.508.2120 should you have any questions regarding this matter.

Sincerely,



Cliff Lentz
Mayor

c: Sepi Richardson, Councilmember and ABAG Boardmember
Richard Napier, CCAG
Clay Holstine, City Manager
John Swiecki, Community Development Director



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E-mail: info@mtc.ca.gov

Phone: 510.464.7900
E-mail: info@abag.ca.gov

May 3, 2012

Ms. Catherine Kutsuris
Director
Contra Costa County Department of Conservation & Development
30 Muir Road
Martinez, CA 94553-4601

RE: Comments on Plan Bay Area

Dear Ms. Kutsuris:

Thank you for your correspondence dated April 18, 2012, to Ken concerning the Plan Bay Area Jobs-Housing Connection Scenario and Transportation Investment Strategy.

Your comments will be presented to ABAG and MTC board members. Since the inception of Plan Bay Area, we have received numerous letters such as yours with detailed and thoughtful comments. ABAG and MTC staffs will present recommendations on a Preferred Scenario at a joint MTC Planning and ABAG Administrative Committee meeting on May 11, 2012.

Both agencies will meet jointly again on May 17 to approve a final Preferred Scenario. This will provide the basis for a draft Sustainable Communities Strategy (SCS) which will undergo an environmental assessment through the remainder of the calendar year. The draft SCS will be released at the end of this year, with adoption of a final SCS slated for April 2013.

We appreciate your concerns and suggestions. The outcome of this major planning effort will be better thanks to your participation.

Sincerely,

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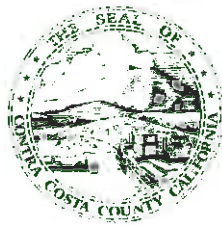
Kenneth Kirkey
Planning Director
Association of Bay Area Governments

**Department of
Conservation &
Development**

30 Muir Road
Martinez, CA 94553-4601

Phone: 1-855-323-2626

**Contra
Costa
County**



Catherine Kutsuris
Director

#20

Aruna Bhat
Deputy Director
Community Development Division

Jason Crapo
Deputy Director
Building Inspection Division

Steven Goetz
Deputy Director
Transportation, Conservation and
Redevelopment Programs

April 18, 2012

Ken Kirkey, Director of Planning and Research
Association of Bay Area Governments
P.O. Box 2050
Oakland, CA 94607-4756

Subject: Comments/Feedback on the **Draft Jobs-Housing Connection Scenario**

Dear Mr. Kirkey:

Thank you for the opportunity to comment on the **Draft Jobs-Housing Connection Scenario**, dated March 9, 2012. We appreciate ABAG's and MTC's continued efforts in developing the Sustainable Communities Strategy for the Regional Transportation Plan pursuant to the requirements of S.B. 375.

The following are Contra Costa County's response and feedback to the five (5) listed questions contained in your March 23, 2012 transmittal memorandum for the **Draft Jobs-Housing Connection Scenario**:

1. **Please provide your thoughts on the job and housing distribution methodologies utilized in the Jobs-Housing Connection Scenario (see Appendix, Jobs-Housing Connection Scenario Draft Report).**
 - **Calculation of Locally-based Development Potential:** The methodology states there are three factors that determine the "Local" development potential including local jurisdiction input, PDA place type, and UrbanSim analysis. This process has resulted in an increase of **500%** between the County's anticipated growth estimate and the Locally-based Development Potential in the unincorporated portion of the Pittsburg/Bay Point BART Station Area Priority Development Area (PDA). The County reported anticipated growth of 616 units. The local housing unit growth number provided in the **Jobs-Housing Connection** projects 3,945 dwelling units. This significant disparity raises concerns regarding the role the PDA place type and UrbanSim analysis in projecting the local development estimate.

- **Vacancy Rate:** Given the extent of the ongoing foreclosure crisis, factoring a vacancy rate into the housing calculation is wise. However, we are concerned the overall vacancy rate does not capture the impact of localized vacancy factors. There are a number of jurisdictions in the Bay Area with very high vacancy rates due to a large number of vacation homes or seasonal units. In Contra Costa County the high percentage of vacant units, which are for sale/for lease, and empty, often occur in lower income communities because of the very weak local housing and job market. The vacancy rate factors used in making housing projects and setting RHNA allocations should distinguish the characteristics and difference between Bay Area jurisdictions in vacancy rates. For example, vacancy rates in North Bay communities are a function of the high percentage of vacation homes or seasonal units, as opposed to high vacancy rates in lower income communities in the Bay Area where the housing and job markets are very weak.
- **Broad Based increases:** The model appears to distribute housing beyond the Locally-based Development Potential by increasing density due to location near transit. In the instance of Pittsburg/Bay Point BART Station Area, the local planning efforts by both Contra Costa County and the City of Pittsburg have been aimed at maximizing residential density near the BART station in an effort to establish Transit Oriented Development (TOD). However, as described above we are concerned that by applying a broad based increase in housing growth due to proximity to the BART Station the scale and extent of the housing growth goes well beyond the local capacity of each jurisdiction's planned growth in the station area.

2. Please provide any feedback on the housing and job growth distributions to your PDAs and your jurisdiction.

North Richmond: The combination of the economic recession, ongoing housing foreclosure crisis, and dissolution of redevelopment have significantly altered the development potential in North Richmond that was identified in Contra Costa County's 2007 PDA submittal. The following outlines specific issues related to North Richmond:

- Vacancy Rate:** According to the 2010 Census, the vacancy rate in North Richmond is at 17%. These vacant units are not seasonal, recreational, or occasional use units, but predominantly single family residences.
- Dissolution of Redevelopment:** The County Redevelopment Agency was funding the preparation of a Specific Plan/General Plan Amendment that if approved would have resulted in the conversion of 200 acres of vacant and underutilized industrial land between in North Richmond between San Pablo Creek and Wildcat Creek into a new residential neighborhood with up to 2,100 new dwelling units, new retail commercial uses, and public park and open space amenities. Because the plan area was between two creeks in a

flood prone area of North Richmond, the Specific Plan had identified approximately \$45 million in backbone infrastructure (grading, streets, water, sanitary sewer, storm drainage, etc.) and \$16 million in community facilities to improve and upgrade area for a new residential neighborhood. The financing and development of these physical improvements were to be under the auspices of the County Redevelopment Agency. Additionally, when the PDA application for North Richmond was submitted in 2007 it was based on the assumption that the Specific Plan would be implemented through the County Redevelopment Agency. The Specific Plan was still in progress through the end of 2011. In late December 2011 when the State Supreme Court upheld state legislation to dissolve redevelopment agencies, all work on the Specific Plan was suspended. It is unknown at this time whether the plan can proceed without redevelopment. There is no current source of funding to complete the Specific Plan, and, more importantly, there is no identified funding mechanism for implementation, namely funding for \$45 million in backbone infrastructure and \$16 million in community facilities.

- C. Development Plan changes: A major residential development applicant in North Richmond has submitted revisions to an approved development plan for a 350 multi-family residential project, reducing the number of approved units from 350 to 220, and shifting from a multi-family orientation to single family residential. While it is still within the General Plan density range, the developer has explained that they can no longer maximize density and still turn a profit.

Bay Point: The County has significant concerns about the level of housing growth anticipated in the Bay Point community. The Pittsburg/Bay Point Specific Plan was approved in 2002 to create a suburban, transit-orientated development with a proposed density reaching 65 units per acre in some areas. However, the final housing growth assumptions for the PDA are too ambitious in the current economic climate. Based on the Specific Plan development policy, the County anticipated an estimated 616 new units in the unincorporated area of the PDA. However, the Local Housing Growth estimate in the ***Jobs-Housing Connection Scenario*** Housing Distribution Detail table is 3,945. Development of this intensity would require massive land acquisition and assembly, likely use of eminent domain, and the demolition of existing uses to allow for more intensive development footprint contemplated under the ***Jobs-Housing Connection Scenario***. Even with the tools associated with Redevelopment, achieving such a high level of growth would very ambitious. Without the aid of Redevelopment, the development assumptions are unattainable. If the ***Jobs-Housing Connection Scenario*** development assumptions are to be achieved on current and available land, the resulting residential density would be an estimated 100 dwelling units per acre.

To provide some perspective about how overly ambitious these development assumptions are for the Pittsburg/Bay Point BART Station Area, we have

compared this growth rate to the County's thirty year experience in promoting and implementing transit-orientated development in the vicinity of Pleasant Hill/Contra Costa Centre BART Station Area. The Pleasant Hill/Contra Costa Centre BART Station Area is centrally located in Contra Costa County and situated directly adjacent to the Interstate 680 freeway. Within a ½ mile radius of this BART station there is approximately 115 acres unincorporated land area designated and zoned for multi-family residential use. To date, after 30 years of work and significant public resources, the County has been able to yield 3,333 multi-family residential units within a ½ mile radius of the station platform. In terms of residential density, the two largest multi-family residential projects most immediate to the station platform area range from 75 to 76 dwelling units to the acre, and in the aggregate, taking the residential density for the entire 115 acres of unincorporated land area designated for multi-family residential development works out to 29 units to the acre. By comparison, the projected residential development for the Pittsburg/Bay Point Station Area PDA under the ***Jobs-Housing Connection Scenario*** to Year 2040 would actually exceed the multi-family development accomplished by the County over the past 30 years in Pleasant Hill/Contra Costa Centre. This would be projected to occur despite the Pittsburg/Bay Point Station Area PDA's location in East County, situated at the end of the BART line, the lack of employment generating uses, an historic housing market collapse (according to RealtyTrac, there have been over 8,700 foreclosures in Bay Point), and the loss of significant public assistance and implementation tools under Redevelopment.

By way of example, an Urban Land Institute (ULI) sponsored study prepared for the then County Redevelopment Agency in 2010 examined the feasibility of a pending mixed use development project that included 325 multiple family units. This project is located directly across from the Pittsburg/Bay Point BART Station. The study concluded that the project would not be possible without a significant public subsidy. In order to develop the 7.6 acre property owned by the Redevelopment Agency across from the BART Station, upwards of \$25 million would be needed to fill the gap between the project costs and anticipated revenue. Even under a model for single family residential development the project would require public subsidy, although significantly less at \$7.5 million. Without the ability to leverage funds, achieving the planned development is uncertain at this time.

Attached for your consideration, are two items in support of our comments regarding Bay Point: (1) map illustrating our analysis of the growth potential in the Pittsburg/Bay Point Station Area PDA; and, (2) Orbisonia Heights Site, Contra Costa County, Limited Market Study, prepared for the Contra Costa County Redevelopment Agency, October 2010, by the Urban Land Institute Young Leader Group (this is the above referenced ULI analysis on the challenges for the high density multi-family residential site near the BART station).

Rodeo and Unincorporated Pinole SSA: The development assumptions along the unincorporated areas of San Pablo Ave are too high. Neither local land use policy nor market conditions can support the proposed Jobs-Housing Connection estimates.

3. **Please review the data used to construct the distributions and provide any corrections. In particular, provide any corrections to the following data in the Jobs-Housing Connection Housing Distribution Details spreadsheet (provided).**

Local PDA Housing Unit Growth: column S (“All Areas” worksheet)

Row 174 (Pinole SSA/San Pablo Ave): 256 change to 50

Row 177 (Pittsburg Bay Point BART Station Area): 3,945 change to 616

Row 188 (North Richmond): 2,350 change to 300

Row 209 (Rodeo, San Pablo Ave): 230 change to 100

Local Jurisdiction Housing Unit Growth: column H (“Jurisdictions” worksheet)

The spreadsheet does not provide an estimate for unincorporated County.

4. **Do you feel that with this scenario your local jurisdiction can advance the goals and principles of the Sustainable Communities Strategy (SCS)?**

This scenario does not reflect the current pattern for employment growth now being experienced in Contra Costa County. There are areas of the County that are experiencing significant employment growth and where we anticipated future employment to occur, particularly in the I-680 Corridor. Yet, it is perplexing why the cities along the I-680 Corridor are not showing higher levels of housing growth as presented in the most recent RHNA proposal that is a part of the SCS process.

5. **Additional comments**

A. Geographic Equity Concerns: The SCS projects a disproportionate share of the County’s housing to be constructed in the former redevelopment areas of North Richmond, Bay Point, and Rodeo. In addition to the feasibility issues discussed above, these assumptions place an inappropriate burden to develop affordable housing on the lowest income areas in the County. The SCS places 55% of the County’s growth in the impoverished communities of Bay Point and North Richmond. This approach does not support geographic equity, and it exacerbates segregation and concentration of poverty. This approach does not support the goals of access to jobs and transit as the areas listed above are not near major job centers. North Richmond is poorly served by public transit.

- B. SCS methodology and impact on Regional Housing Needs Allocation (RHNA): The comments contained in this letter refer directly to the SCS methodology. However, the SCS is directly related to the RHNA and the comments here will have a direct impact on the RHNA for Contra Costa County. It is our intention that the RHNA for the County be consistent with the stated goals of the SCS and that underlying assumptions are reasonable.

Thank you again for the opportunity to comment on the **Draft Jobs-Housing Connection Scenario**. We look forward to our comments being considered as the scenario for the Sustainable Communities Strategy is further refined. In the meantime, should you or your staff have any questions or concerns with Contra Costa County's comments, please contact Patrick Roche, Principal Planner, by telephone at (925) 674-7807 or by email at patrick.roche@cccd.cccounty.us.

Sincerely yours,





Catherine Kutsuris
Director

Attachments (2 items)

1. Map of Bay Point BART Station Area PDA Growth Potential
2. Orbisonia Heights Site, Contra Costa County, Limited Market Study, prepared for the Contra Costa County Redevelopment Agency, October 2010, by the Urban Land Institute Young Leader Group

CC: Members, Contra Costa County Board of Supervisors
David Twa, County Administrator
Sailaja Kurella, Regional Planner, ABAG

SCS Proposed Housing Growth: 3,976
Maximum Build Out based on General Plan Land Use Designation: 2,292
Vacant and Underutilized Buildout: 592
Contra Costa County Estimated Housing Growth: 616

-  Pittsburg/Bay Point PDA
Gross Acres: 335.5
Net Acres: 249
-  Vacant or Underutilized Property
Est. 32.5 acres
If projected develop is to occur
on existing vacant and underutilized
sites, the density would exceed
100 units/acre

General Plan Build Out
Excludes this site,
It is land locked and has
an agricultural easement
that restricts development
If developed, 143 units

Orbisonia Heights Former Redevelopment Project:
Planned Units: 325 units at 65 units/acre (requires an estimated \$25 million subsidy to implement)
Most Feasible Development Scenario: 96 Units (requires \$7.5 million subsidy)



Orbisonia Heights Site, Contra Costa County

Limited Market Study

Date: October 24, 2010

Prepared for
Contra Costa County Redevelopment Agency

Urban Land Institute
Young Leader Mentor Group 2010
Patrick Devinger
Peter MacLennan
Daniel Perl
Lisa Vilhauer
Matt Weber
Mentor – Charles A. Long

October 24, 2010

Maureen Toms, AICP
Department of Conservation and Development
Redevelopment Agency
2530 Arnold Drive, Suite 190
Martinez CA 94553

SUBJECT: Limited Market Study
Orbisonia Heights Site
Bay Point, Contra Costa County, CA

Dear Ms. Toms:

We are please to present to you our findings regarding the 7.6 Acre Orbisonia Heights site located at the northeast corner of Bailey Road and W. Leland Road, within the Bay Point Community in Unincorporated Contra Costa County, under the jurisdiction of the Contra Costa County Redevelopment Agency. The purpose of this report is to present you with a current snapshot of market fundamentals as they relate to the broader feasibility of the project site, as well as to provide you with a range of cost feasible metrics upon market recovery. In addition, we have provided a brief overview of the potential project alternatives based on discussions with various market participants.

Our findings are outlined in the following format:

- A. Market Overview
- B. Land Residual Analysis
- C. Cost Feasibility Analysis
- D. Potential Alternatives
- E. Recommendations

We are happy to discuss our findings in greater detail. Thank you again for the opportunity to provide our assistance on this assignment.

Best regards,

Patrick Devinger
Peter MacLennan
Daniel Perl
Lisa Vilhauer
Matt Weber

A. MARKET INFORMATION

The following bullet points illustrate the primary demographic considerations within a three-mile radius of the subject site, which is considered the primary trade area of the location including the communities of Bay Point and Pittsburg. The information was provided by Claritas and the traffic counts were provided by Site to do Business.

- **Population** – Estimated at 63,000 and expected to grow roughly 1.5% annually over the next 5 years.
- **Housing Tenure (2010)**– 65% Owner Occupied, 35% Renter
- **Household Income (2010)** – Average = \$74,000, Median = \$63,408
- **Resident Age (2000)** – Average = 31, Median = 30
- **Workforce Type (2000)** – White collar = 51%, Blue collar = 27%, Service/Farm = 22%
- **Traffic Counts** - - 26,186 VPD at Bailey Rd. and Hwy 4 (South Side)
- 14,200 VPD at the NE corner of Bailey and W. Leland Rd

It is noted that average and median incomes are lower than those within a 5-mile radius, which are reported at \$83,000 and \$68,000 respectively. Housing tenure reflects strong owner occupancy trends and the local workforce reflects a predominantly white collar base. The area is known for its affordable housing options within the region, which is generally consistent with demographic trends illustrated above. It should also be noted that the California Employment Development Department (EDD) reported unemployment for Contra Costa County at 11.3% as of August 2010, which is compared to 12.4% for the State of California as a whole.

As illustrated above, the site has strong visibility benefitting from its location at the south east corner of the Bailey Road and Hwy 4 interchange. The site's exposure is considered excellent and any development on the site will need to address potential traffic impacts as well as accessibility.

Retail/Office Submarket Trends as of 2Q 2010 – Hwy 4 Submarket

The subject's site is located within the Hwy 4 Submarket as tracked by CoStar, which includes the Antioch/Pittsburg, Brentwood and Martinez/Pacheco submarkets. Trends available as of Second Quarter 2010, are as follows:

HWY 4 SUBMARKET TRENDS RETAIL/OFFICE						
	Total Market Size (SF)	Total Vacancy %	Vacancy 12 mo. change (%)	Asking Rent (\$/SF/Mo.)	Rent 12 mo. change (%)	Capitalization Rate Conclusions
Retail	15,020,309	7.0%	12.9%	\$1.54 NNN	-27.5%	8.00%
Office	4,107,015	9.0%	45.2%	\$1.62 FSG	-11.0%	8.00%
<i>Source: CoStar 2Q10 Market Report</i>						

As illustrated in the table above, both the office and retail submarkets have witnessed significant deterioration over the previous 12-month period, which is primarily due to the further market deterioration associated with the housing related recession that began in Fourth Quarter 2007. In general, while further negative trends may be witnessed in the near-term within the Subject's submarket, the majority of market participants report that fundamentals have begun to stabilize, though a recovery is highly dependant on sustained job creation and increased consumer and investor confidence.

Apartment Submarket Trends as of 1Q 2010 – Concord/Martinez

Apartment market statistics for the subject's submarket are tracked by REIS, which includes the subject's Pittsburg market within the larger Concord/Martinez submarket. The following table illustrates trends for the Apartment market as follows:

CONCORD/MARTINEZ SUBMARKET TRENDS APARTMENT						
	Total Market Size (units)	Total Vacancy %	Vacancy 12 mo. change (%)	Effective Rent (\$/Mo.)	Rent 12 mo. change (%)	Capitalization Rate Conclusions
Multifamily	19,119	4.5%	4.65%	\$1,121	-4.3%	6.50%
<i>Source: REIS</i>						

In addition, we have provided the following market information regarding the most recently constructed Class A project in the subject's submarket, the San Marcos Villas, located approximately 1.2 miles away. As outlined below, San Marcos Villas were constructed in 2009 and consist of 330 units. As of First Quarter 2010, vacancy at the project was reportedly 13.0%, with an average asking rate of \$1,571 per month.

SAN MARCOS VILLAS - MARKET DATA AS OF FIRST QUARTER 2010				
Project	San Marcos Villas	Avg. Asking Rent/Unit		\$1,571
Address	2000 Villa Drive, Pittsburg	Vacancy Rate		13.0%
Reis Submarket	Concord/Martinez			
	Studio	1BR	2BR	3BR
Current Asking Rent/Unit	N/A	\$1,395	\$1,723	N/A
Unit Size (SF)	N/A	810	1091	N/A
Current Asking Rent/SF	N/A	\$1.72	\$1.58	N/A
<i>Source: Reis, Inc.; As of March 31, 2010</i>				

The San Marcos Villas project is reflective of new Class A product, with in-unit washer/dryers, granite counters, 2-tone paint, Jacuzzi style tubs and various community amenities. We contacted the leasing team at San Marcos Villas, which reported that the property was approximately 92% occupied as of July 2010. However, it was indicated that while the repercussions from short sales/foreclosures in the area were having a positive impact on leasing activity as people exited the ownership market for the rental market, continued job losses were resulting in a higher than expected attrition rate, with 11-move outs reported at the time.

SFR New Home For-Sale Market Trends – 2Q 2010

The following discussion reflects the trends for the new home sale market as reported by Hanley Wood, as of Second Quarter 2010. The Orbisonia Heights Site is located in the Contra Costa East Submarket, which includes Antioch, Bay Point, Brentwood, Discovery Bay, Oakley and Pittsburg. The following table outlines median pricing for detached housing as well as total sales volumes including detached and attached product for Second Quarter 2010, as well as over the last four quarters throughout the Bay Area.

Bay Area	Median Detached Base Price:		Total Sales (Detached and Attached)			
	Price	Price/sq. ft.	Last 4 Qtrs	% Capture	Current Qtr.	% Capture
Alameda County	\$706,623	\$284	1,262	19.9%	295	24.4%
Contra Costa Central	\$918,352	\$303	442	7.0%	36	3.0%
Contra Costa East	\$372,250	\$142	584	9.2%	129	10.7%
Contra Costa West	\$406,375	\$217	98	1.5%	19	1.6%
Contra Costa County	\$391,500	\$151	1,124	17.8%	184	15.2%
Santa Clara East	\$654,400	\$244	612	9.7%	127	10.5%
South Coast	\$392,634	\$135	131	2.1%	20	1.7%
Santa Clara West	\$1,207,450	\$599	1,079	17.1%	218	18.1%
San Mateo	\$1,125,740	\$472	386	6.1%	120	9.9%
Santa Clara / San Mateo	\$826,383	\$355	2,208	34.9%	485	40.2%
Marin	\$0	\$0	0	0.0%	0	0.0%
Napa	\$509,000	\$178	104	1.6%	17	1.4%
San Francisco	\$0	\$0	845	13.4%	81	6.7%
Sonoma	\$640,340	\$219	129	2.0%	12	1.0%
North Bay	\$544,820	\$189	1,078	17.0%	110	9.1%
Solano County	\$349,450	\$166	656	10.4%	133	11.0%
Bay Area	\$574,897	\$230	6,328	100%	1,207	100%

At \$372,250, the Contra Costa East submarket reflects the lowest median detached base price for all areas within the Bay Area with the exception of Solano County. The median price per square foot for Contra Costa East at \$142 is well below the Bay Area median, and well below Contra Costa Central and West. Absorption as of Second Quarter was strongest within the subject's submarket as compared to Contra Costa Central and West submarkets. The median reported home size as of Second Quarter 2010 is 2,621 square feet. The lower median pricing and stronger absorption is generally reflective given the subject site's new home market is oriented toward starter homes and there are fewer barriers to entry as compared to the rest of Contra Costa County.

While there is no current data for attached home pricing, as there is no attached product current selling in the market per Hanley Wood, pricing as of one year prior in Second Quarter 2009 was roughly \$182/SF for attached product, with a median sale price of \$421,500 and a median square footage of 2,291 square feet.

Quarterly New SFR Inventory Trends - 2Q 2010

The following tables outline the quarterly inventory trends for both detached and attached product in the Contra Costa and Alameda submarkets. It is noted that a deceleration in sale activity has been witnessed across the Bay Area, which coincides with the expiration of Federal and State tax credits and new-home buyer incentives.

Quarterly SFR Detached Sale Trends (April-10 through June-10)

SINGLE-FAMILY DETACHED						
Submarket	NET SALES			MONTHLY SALES / PROJECT		
	Current Period	Year	% Change	Current Period	Same Period Last Year	% Change
Alameda County	194	186	4.3%	2.2	2.3	(5.3%)
Contra Costa County	169	340	(50.3%)	1.1	1.6	(33.4%)
Contra Costa County (Central)	28	132	(78.8%)	0.6	1.5	(62.4%)
Contra Costa County (East)	129	190	(32.1%)	1.3	1.8	(26.4%)
Contra Costa County (West)	12	18	(33.3%)	1.3	1.1	18.3%

Quarterly SFR Attached Sale Trends (April-10 through June-10)

ATTACHED TOWNHOMES AND CONDOMINIUMS						
Submarket	NET SALES			MONTHLY SALES / PROJECT		
	Current Period	Same Period Last Year	% Change	Current Period	Same Period Last Year	% Change
Alameda County	101	205	(50.7%)	1.1	1.6	(34.3%)
Contra Costa County	15	105	(85.7%)	0.5	3.4	(86.5%)
Contra Costa County (Central)	8	62	(87.1%)	0.4	3.8	(90.1%)
Contra Costa County (East)	0	8	N/A	0.0	2.7	N/A
Contra Costa County (West)	7	35	(80.0%)	0.8	2.9	(73.3%)

Orbisonia Heights MLS Re-sale Market Summary - Attached

Within a two mile radius of the Orbisonia Heights project 62 “Duet”, “Condo”, and “Townhouse” units were sold via the EBRD MLS between October 1, 2009 and September 30, 2010. The mean sales price across all product types was \$96,400 per unit or \$93 per square foot.

The mean sales price for Duet housing was \$114,200 per unit. While the mean sales price for Condominium product within a two mile radius was \$67,800 per unit. Townhouse product sold for a mean price of \$105,400 per unit.

As of September 30, 2010 there were 17 active and pending multi-family units within a two mile radius. Eleven units are pending close and 6 are actively on the market. The mean listing price for active units is \$105,100 per unit or \$103 per square foot. The mean price for pending units is \$85,300 per unit or \$88 per square foot.

Orbisonia Heights MLS Re-sale Market Summary - Detached

In the community of Bay Point and within a one mile radius of the subject property, 75 single-family homes were sold via the EBRD MLS between October 1, 2009 and September 30, 2010. The mean sales price was \$142,500 or \$106 per square foot.

Market Information Summary

Based on the preceding, there is limited demand for office, retail, apartment, and for sale residential in the current market at the subject site. Near term development of the project site is considered infeasible as current market values are well below replacement cost, which will be illustrated in the following land residual analysis. In addition, discussions with market participants familiar with the subject’s location indicated that even under stronger market conditions, the subject site is not suitable for significant commercial or retail development based on the tenant demand within the area.

One new project currently selling in the market is Vidrio, located in Downtown Pittsburg, which represents a foreclosure that was taken over by the City of Pittsburg and represents a substantial city investment. Reportedly, sales are strong with pricing for 3 bedrooms 2 bath units around \$198,000. Overall, the residential re-sale market is underperforming the new for-sale product in the current market based on price per square foot. It is noted that many of the residential re-sales reflect distressed transactions, which has a lower impact on the overall pricing.

LAND RESIDUAL ANALYSIS

The Orbisonia Heights Site has a General Plan designation of Residential Mixed Use Bay Point (M-6), and the development goals as outlined in the RFQ, dated August 2005, are to “*encourage a moderately high density, unified residential development which takes advantage of the area’s close proximity to both the BART Station and Ambrose Park.*” The RFQ reflects a development program for the site including “*40,000 square feet of commercial space, with frontage on Bailey Road or within a plaza, plus 325 residential units based on a density of 65 dwelling units per acre.*” It is noted that development intensity for the site is specified to be no less and 40 dwelling units per acre, which is permitted by the Pittsburg/Bay Point BART Station Area Specific Plan.

To provide a current indication of the Orbisonia Heights Site value from a potential development perspective, we have performed a rough residual land analysis based on various development scenarios, which rely on current market oriented assumptions for pricing, cost, return, etc. First we test the current feasibility of the preferred development program as outlined in the RFQ. We then provide two additional scenarios, each testing reduced degrees of density without any commercial component. The development scenarios are outlined as follows:

Scenario I – 325 podium residential units; 40,000 SF of commercial.

Scenario II – 205 townhome units. No commercial.

Scenario III – 96 SFR detached. No commercial.

As will be illustrated in the models that follow, the residual land value is negative under each scenario, indicating that without substantial subsidy, near-term project feasibility at the Orbisonia Heights Site is highly unlikely, which is largely due to the deterioration of market fundamentals over the past 2-3 years. It is noted that a direct correlation exists between the level of density and cost feasibility, whereby as density decreases, achievable sale pricing increases and overall development costs decrease, resulting in a greater return to the investor/developer.

Based on the preceding discussion, we have used the following market assumptions in our analysis to arrive at an indication of the land residual based on the current market conditions, which are generally supported by discussions with various market participants.

PROFORMA ASSUMPTIONS	
Project Income Assumptions	
Market Rate For Sale Attached (\$/SF)	\$125
Market Rate For Sale Detached (\$/SF)	\$150
Affordable Housing (\$/SF)	\$125
Cap rate (%)	7.0%
Market Rent NNN (\$/SF/YR)	\$21
Project Cost Assumptions ¹	
Podium Residential Building Costs (\$/SF)	\$150
Townhome Residential Building Costs (\$/SF)	\$110
Single Family Residential Costs (\$/SF)	\$90
Commercial Building Costs (\$/SF)	\$150
Site Development (\$/SF)	\$20
Podium Parking Stall	\$25,000
Development Fees (\$/Unit)	\$40,000
Condominium Insurance (\$/Unit)	\$3,250
¹ Cost estimates do not reflect prevailing wage	

RFP Preferred - Scenario I Podium

1	LAND AREA	Acres	SF
2	All parcels	7.60	331,056
3			
4	TOTAL	7.60	331,056

5	DEVELOPMENT PLAN AND PROJECT VALUE					
6	RESIDENTIAL	Units	Square Feet	\$/sf	Total Price	Total Value
7	Market Rate #1 1BR/1.5 BA	126	850	\$125	\$106,250	\$13,387,500
8	Market Rate #2 2BR/2.5 BA	150	1,100	\$125	\$137,500	\$20,625,000
9	Affordable townhomes	49	1,100	\$125	\$137,500	\$6,703,125
10	Halls and lobbies		15%			
11	TOTAL RESIDENTIAL	325	374,584			\$40,715,625
12	COMMERCIAL		Square Feet	NNN \$/sf	NOI	Total Value
13	Ground Floor retail		40,000	\$21	\$781,200	\$11,160,000
14						
15	Cap Rate=	7.0%				
16	TOTAL COMMERCIAL		40,000			\$11,160,000
17	TOTAL PROJECT VALUE		414,584			\$51,875,625

12	PROJECT COSTS					TOTAL
13	Construction costs	Square Feet	\$/sf	Parking stalls	\$/stall	
14	Residential Building Costs	374,584	\$150			\$56,187,563
15	Commercial Building Costs	40,000	\$150			\$6,000,000
16	Site Development	331,056	\$20			\$6,621,120
17	Parking			325	\$25,000	\$8,125,000
18	Total Construction Costs					\$76,933,683
19	Per unit costs			Units	Fee/unit	
20	Development Fees			325	\$40,000	\$12,990,000
21	Condominium Insurance				\$3,250	\$0
22	Total per unit costs					\$12,990,000
23	Soft Costs	%				
24	Design	4.5%	Applied to construction only			\$3,462,016
25	Marketing	5.0%	Applied to total project value			\$2,593,781
26	Construction management	4.0%	Applied to construction only			\$3,077,347
27	Finance (Based on construction and absorption period)	8.5%	Applied to 60% of construction and per unit			\$4,586,108
28	Taxes	1.0%	Applied to construction and per unit			\$899,237
29	Contingency	10.0%	Applied to construction and per unit			\$8,992,368
30	Total Soft Costs					\$23,610,857
31	TOTAL PROJECT COSTS					\$113,534,540

32	Supported investment	@	20%	Hurdle Rate	\$43,229,688
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33	RESIDUAL LAND VALUATION				
34	Residual land Value				-\$70,304,852
35	\$/acre				-\$9,250,638
36	\$/sf				-\$212.37
37	\$/Unit				-\$216,489

Townhome - Scenario II

1	LAND AREA	Acres	SF
2	All parcels	7.60	331,056
3			
4	TOTAL	7.60	331,056

5	DEVELOPMENT PLAN AND PROJECT VALUE					
6	RESIDENTIAL	Units	Square Feet	\$/sf	Total Price	Total Value
7	Market Rate Townhomes	205	1,400	\$125	\$175,000	\$35,875,000
10	Halls and lobbies		0%			
11	TOTAL RESIDENTIAL	205	287,000			\$35,875,000
12	COMMERCIAL		Square Feet	NNN \$/sf	NOI	Total Value
13	Ground Floor retail		0	\$0	\$0	\$0
14						
15	Cap Rate=	7.0%				
16	TOTAL COMMERCIAL		0			\$0
17	TOTAL PROJECT VALUE		287,000			\$35,875,000

12	PROJECT COSTS					TOTAL
13	<u>Construction costs</u>	Square Feet	\$/sf	Parking stalls	\$/stall	
14	Residential Building Costs	287,000	\$110			\$31,570,000
15	Commercial Building Costs	0	\$0			\$0
16	Site Development	331,056	\$20			\$6,621,120
17	Parking			0	\$0	\$0
18	Total Construction Costs					\$38,191,120
19	<u>Per unit costs</u>			Units	Fee/unit	
20	Development Fees			205	\$40,000	\$8,200,000
21	Condominium Insurance			205	\$3,250	\$666,250
22	Total per unit costs					\$8,866,250
23	<u>Soft Costs</u>	%				
24	Design	4.5%	Applied to construction only			\$1,718,600
25	Marketing	5.0%	Applied to total project value			\$1,793,750
26	Construction management	4.0%	Applied to construction only			\$1,527,645
27	Finance (Based on construction and absorption period)	8.5%	Applied to 60% of construction and per unit			\$2,399,926
28	Taxes	1.0%	Applied to construction and per unit			\$470,574
29	Contingency	10.0%	Applied to construction and per unit			\$4,705,737
30	Total Soft Costs					\$12,616,232
31	TOTAL PROJECT COSTS					\$59,673,602

32	Supported investment	@	20%	Hurdle Rate	\$29,895,833
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33	RESIDUAL LAND VALUATION					
34	Residual land Value					-\$29,777,768
35	\$/acre					-\$3,918,127
36	\$/sf					-\$89.95
37	\$/Unit					-\$145,257

SFR - Scenario III

1	LAND AREA	Acres	SF
2	All parcels	7.60	331,056
3			
4	TOTAL	7.60	331,056

5	DEVELOPMENT PLAN AND PROJECT VALUE					
6	RESIDENTIAL	Units	Square Feet	\$/sf	Total Price	Total Value
7	Market Rate SFR	96	1,800	\$150	\$270,000	\$25,920,000
10	Halls and lobbies		0%			
11	TOTAL RESIDENTIAL	96	172,800			\$25,920,000
12	COMMERCIAL		Square Feet	NNN \$/sf	NOI	Total Value
13	Ground Floor retail		0	\$0	\$0	\$0
14						
15	Cap Rate=	7.0%				
16	TOTAL COMMERCIAL		0			\$0
17	TOTAL PROJECT VALUE		172,800			\$25,920,000

12	PROJECT COSTS					TOTAL
13	<u>Construction costs</u>	Square Feet	\$/sf	Parking stalls	\$/stall	
14	Residential Building Costs	172,800	\$90			\$15,552,000
15	Commercial Building Costs	0	\$0			\$0
16	Site Development	331,056	\$20			\$6,621,120
17	Parking			0	\$0	\$0
18	Total Construction Costs					\$22,173,120
19	<u>Per unit costs</u>			Units	Fee/unit	
20	Development Fees			96	\$40,000	\$3,840,000
21	Condominium Insurance			96		\$0
22	Total per unit costs					\$3,840,000
23	<u>Soft Costs</u>	%				
24	Design	4.5%	Applied to construction only			\$997,790
25	Marketing	5.0%	Applied to total project value			\$1,296,000
26	Construction management	4.0%	Applied to construction only			\$886,925
27	Finance (Based on construction and absorption period)	8.5%	Applied to 60% of construction and per unit			\$1,326,669
28	Taxes	1.0%	Applied to construction and per unit			\$260,131
29	Contingency	10.0%	Applied to construction and per unit			\$2,601,312
30	Total Soft Costs					\$7,368,828
31	TOTAL PROJECT COSTS					\$33,381,948

32	Supported investment	@	20%	Hurdle Rate	\$21,600,000
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33	RESIDUAL LAND VALUATION					
34	Residual land Value					-\$11,781,948
35	\$/acre					-\$1,550,256
36	\$/sf					-\$35.59
37	\$/Unit					-\$122,729

B. COST FEASIBILITY ANALYSIS

At your request, we have provided the following analysis of cost feasibility pricing levels for the Orbisonia Heights site. The following conclusions are based on the preferred development scenario per the original RFQ, reflecting Scenario I above. Utilizing the previous construction costs assumptions, the following table illustrates the cost feasible sale pricing, commercial/retail rents and applicable cap rate necessary to arrive at a positive land residual value.

COST FEASIBLE PRICING INDICATIONS	
Project Income Assumptions	
For Sale Attached (\$/SF)	\$390
Affordable Housing (\$/SF)	\$210
Cap rate (%)	5.0%
Market Rent NNN (\$/SF/YR)	\$36

As outlined above, there is a significant disparity between the current market pricing and the cost feasible market pricing necessary to arrive at a positive land residual value. While an in-depth cost analysis may result in reduced hard and soft cost estimates that would allow for lower pricing, our cost estimates for the podium product are generally in line with similar construction budgets for projects of a similar density, at \$218/SF per saleable square foot of residential product. After considering development fees and other soft costs, cost feasible pricing at this level for attached housing may not be attainable in the market in the mid- to long-term, and would have to be offset by stronger financial components of the project. Overall, higher density podium construction has a prohibitive impact on project feasibility due to supplying the required parking.

The table on the following page illustrates the residual value calculation for the preferred development scenario based on cost feasible pricing.

RFP Preferred - Scenario I (COST FEASIBLE)

1	LAND AREA	Acres	SF
2	All parcels	7.60	331,056
3			
4	TOTAL	7.60	331,056

5	DEVELOPMENT PLAN AND PROJECT VALUE					
6	RESIDENTIAL	Units	Square Feet	\$/sf	Total Price	Total Value
7	Market Rate #1 1BR/1.5 BA	126	850	\$390	\$331,500	\$41,769,000
8	Market Rate #2 2BR/2.5 BA	150	1,100	\$390	\$429,000	\$64,350,000
9	Affordable townhomes	49	1,100	\$210	\$231,000	\$11,261,250
10	Halls and lobbies		15%			
11	TOTAL RESIDENTIAL	325	374,584			\$117,380,250
12	COMMERCIAL		Square Feet	NNN \$/sf	NOI	Total Value
13	Ground Floor retail		40,000	\$36	\$1,339,200	\$26,784,000
14						
15	Cap Rate=	5.0%				
16	TOTAL COMMERCIAL		40,000			\$26,784,000
17	TOTAL PROJECT VALUE		414,584			\$144,164,250

12	PROJECT COSTS					TOTAL
13	Construction costs	Square Feet	\$/sf	Parking stalls	\$/stall	
14	Residential Building Costs	374,584	\$150			\$56,187,563
15	Commercial Building Costs	40,000	\$150			\$6,000,000
16	Site Development	331,056	\$20			\$6,621,120
17	Parking			325	\$25,000	\$8,125,000
18	Total Construction Costs					\$76,933,683
19	Per unit costs			Units	Fee/unit	
20	Development Fees			325	\$40,000	\$12,990,000
21	Condominium Insurance			325	\$3,250	\$1,055,438
22	Total per unit costs					\$14,045,438
23	Soft Costs	%				
24	Design	4.5%	Applied to construction only			\$3,462,016
25	Marketing	5.0%	Applied to total project value			\$7,208,213
26	Construction management	4.0%	Applied to construction only			\$3,077,347
27	Finance (Based on construction and absorption period)	8.5%	Applied to 60% of construction and per unit			\$4,639,935
28	Taxes	1.0%	Applied to construction and per unit			\$909,791
29	Contingency	10.0%	Applied to construction and per unit			\$9,097,912
30	Total Soft Costs					\$28,395,214
31	TOTAL PROJECT COSTS					\$119,374,334

32	Supported investment	@	20%	Hurdle Rate	\$120,136,875
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33	RESIDUAL LAND VALUATION					
34	Residual land Value					\$762,541
35	\$/acre					\$100,334
36	\$/sf					\$2.30
37	\$/Unit					\$2,348

C. POTENTIAL ALTERNATIVES

As illustrated in our land residual analysis, current market rents for residential, retail, and office product does not cover the costs of new development. The development scenarios shown earlier in this report all highlight a negative residual land value, which would require additional subsidy from the Redevelopment Agency to try to entice a developer to pursue a project. While the vision for the site as laid out in the specific plan could have been successfully executed at the top of the market, the vision is no longer in line with market fundamentals in the short- to mid-term. As such, the vision may need to be revisited to allow exploration of alternate uses.

We have explored several alternate uses for the site. One such option could be the use of the site on an interim basis while the market recovers (i.e. overflow parking lot for BART patrons). Another alternative use could include build-to-suit development for a pre-identified tenant (i.e. Medical Office). Identification of a tenant, office or otherwise, would lower the market risk of development, and because a Medical Office tenant would presumably sign a long term lease, the vacancy risk would be reduced. Additionally, a Medical Office tenant would have specialized build-out requirements, which could limit the competition with existing buildings unable to meet the specialized build-out requirements. Also, given recent Federal health reform, additional funding sources may be available to cover some of the development costs of a Medical Office product. Both of these scenarios would require further analysis to determine their feasibility.

Other alternate development scenarios worth considering, as identified in our discussions with market participants, could include the development of a new public, charter, or private high school on the site. Given the proximity to Ambrose Park, which has a pool and other facilities that a school could take advantage of, and the fact that Bay Point lacks its own public high school, development of a new high school may be worth exploring. While a school use does not produce taxable sales revenues as a retailer would, it does help activate the street, bring vibrancy to the area, and could meet a greater needs of the community.

At any rate, market rents are at historical lows and are expected to increase in the mid- to long-term. As such, if current development was located on only a portion of the site, the balance of the site could be developed at a future time when market conditions become more favorable and rents are higher. This phased development approach could bring activity and to the site in the short term without sacrificing the potential for future opportunities.

D. RECOMMENDATIONS

As illustrated in the preceding analysis, project density plays a critical role in the feasibility of the project reflecting a direct and meaningful relationship. As construction costs increase with density, project feasible pricing is pushed beyond a range that is supportable in the market. This is currently evidenced by the large disparity in the market by the Vidrio project in downtown Pittsburg, which reportedly cost \$30 million, or roughly \$400,000 per unit to construct and is currently selling for approximately \$198,000 per unit. Accordingly, a higher density project on the Orbisonia Heights Site will not be feasible without additional subsidy until pricing increases substantially.

The limited barrier of entry for new single family detached home construction in the subject's immediate area should also be considered, as this presents a superior buying alternative for potential home buyers in the market at a lower price point than higher density product. This is largely the result of the substantially lower construction costs and the efficiencies afforded by the production home builders.

Ultimately, the area demographics are such that population growth and future demand will support development of the site upon a return to cost feasible levels for commercial, retail, apartment, and for-sale residential product. Forecasting the length of time in which pricing supports the desired level density is beyond the scope of this analysis, and would be highly speculative under the current economic conditions.

Based on the preceding, it is our recommendation that the Contra Costa Redevelopment Agency work toward creating more favorable project conditions or toward identifying a significant user/tenant for the Orbisonia Heights project site to attract development in the near- to mid-term. One area where this could be done is by mitigating project risks, real or perceived, associated with entitlement and approval of the site. The Redevelopment Agency may consider coordinating with the City of Pittsburg and respective governing agency for Ambrose Park toward presenting a unified development concept for the Orbisonia Heights project. Another opportunity would be to pursue a preliminary development plan for the site based on the preferred development scenario. Having a plan in place that identifies a clear vision for the incorporation of Ambrose Park would significantly eliminate potential development entitlement risk; this would also potentially serve as a project catalyst and/or the opportunity for Ambrose Park to realize its potential as a significant community amenity. The Agency might also consider reducing impact fees or other forms of subsidy to incentivize development, including land contribution.

In addition, the Redevelopment Agency might leverage market knowledge to identify alternative project partners, such as a regional public agency office user, non-profit such as the YMCA, or alternative user that would be committed to operating at the site. With a significant user/tenant secured, the marketing risk would be substantially reduced as having a project anchor would be attractive to potential developers. Alternatively, the Agency might consider allowing conditional uses under the Pittsburg/Bay Point BART Station Specific Plan, which would allow for educational uses such as a charter high-school, or a larger concentration of commercial space, should a large user such as a regional outpatient medical center be identified.



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May 3, 2012

Ms. Jeri Ram
Community Development Director
City of Dublin
100 Civic Plaza
Dublin, CA 94568

RE: Comments on Plan Bay Area

Dear Ms. Ram:

Thank you for your correspondence dated April 18, 2012, to our agencies concerning the Plan Bay Area Jobs-Housing Connection Scenario and Transportation Investment Strategy.

Your comments will be presented to ABAG and MTC board members. Since the inception of Plan Bay Area, we have received numerous letters such as yours with detailed and thoughtful comments. ABAG and MTC staffs will present recommendations on a Preferred Scenario at a joint MTC Planning and ABAG Administrative Committee meeting on May 11, 2012.

Both agencies will meet jointly again on May 17 to approve a final Preferred Scenario. This will provide the basis for a draft Sustainable Communities Strategy (SCS) which will undergo an environmental assessment through the remainder of the calendar year. The draft SCS will be released at the end of this year, with adoption of a final SCS slated for April 2013.

We appreciate your concerns and suggestions. The outcome of this major planning effort will be better thanks to your participation.

Sincerely,

Doug Kimsey
Planning Director
Metropolitan Transportation Commission

Kenneth Kirkey
Planning Director
Association of Bay Area Governments

Steve. Ann. Doug. P.I.

April 18, 2012



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Subject: Local Government Feedback on the Preferred Land Use Scenario

To Whom It May Concern:

At the April 17, 2012 City Council meeting Staff presented the draft Preferred Land Use Scenario to the Dublin City Council and solicited their feedback.

The draft Preferred Land Use Scenario fails to incorporate comments provided by the City of Dublin for both the Initial Vision Scenario and the Alternative Scenarios (Attachments 1 and 2). In fact, the level of housing growth in the draft Preferred Scenario is greater than in all previous land use scenarios and the level of job growth is significantly lower than City estimates which are clear indications that the City's comments have not been incorporated into the development of the Preferred Scenario.

The Preferred Scenario assumes 36,560 housing units in Dublin in 2040; the City estimates 28,701 housing units, or 7,859 fewer housing units than assumed in the Preferred Scenario. The draft Jobs-Housing Connection Scenario report released on March 9, 2012 does not provide a breakdown of housing units by Priority Development Area (PDA). Therefore, we are not able to determine how many units have been assigned to each of the three PDAs in Dublin, let alone know where these additional 7,859 housing units are proposed to be located. Table 1 below provides Dublin's estimates of housing growth both Citywide and by PDA.

Table 1. Projected Housing Units (2040)

	Preferred Scenario	City Estimates
Downtown Dublin PDA	N/A	1,634 ¹
Town Center PDA	N/A	5,949 ^{2,3}
Transit Center PDA	N/A	3,400 ⁴
Total in PDAs	N/A	10,983
Total Outside PDAs	N/A	17,718 ⁵
Citywide Total	36,560	28,701

¹334 existing units as of 2011; 1,300 new units per the Downtown Dublin Specific Plan

²Based on approved entitlements and units remaining per the Eastern Dublin Specific Plan

³85 units could be added if the Area G Public/Semi-Public site is converted to residential

⁴1,800 units at the Dublin Transit Center and 1,600 units at Camp Parks/SunCal

⁵2,021 units may be added if the following are entitled: Doolan Canyon (1,990), Positano P/SP(12) and Area F P/SP (19)

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Fire Prevention
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Human Resources
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Parks & Community Services
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Based on current Planning documents, certified environmental impact reports, and recently constructed neighborhoods that will remain in place far beyond 2040, Dublin cannot accommodate the level of growth that the Preferred Scenario assumes. It is also worth noting that the Preferred Scenario assumes 3,750 fewer households than housing units in 2040 which assumes a 10% vacancy rate City-wide.

Additionally, the overestimation of housing growth in the Preferred Scenario has the potential to result in an increased housing unit allocation as part of the Regional Housing Needs Allocation for the 2014-2022 planning period and jeopardize our ability to obtain a certified Housing Element.

With respect to employment growth, the Preferred Scenario assumes 28,060 jobs in Dublin in 2040; the City estimates 44,901 jobs, or 16,841 more jobs than assumed in the Preferred Scenario. As noted above, the draft Jobs-Housing Connection Scenario report released on March 9, 2012 does not provide a breakdown of jobs by Priority Development Area for us to know where jobs are being allocated. Table 2 below provides Dublin's estimates of job growth both Citywide and by PDA.

Table 2. Projected Jobs (2040)

	Preferred Scenario	City Estimates
Downtown Dublin PDA	N/A	5,952
Town Center PDA	N/A	3,014
Transit Center PDA	N/A	9,028
Total in PDAs	N/A	17,994
Total Outside PDAs	N/A	26,907
Citywide Total	28,060	44,901

As stated in our February 8, 2012 comment letter on the Alternative Land Use Scenarios, employment growth in Dublin is grossly underestimated. Failure to recognize the job growth potential within Dublin and especially within the Transit Center Priority Development Area (PDA) undermines the value of this PDA and its ability to capitalize on the financial investments made by the Bay Area Rapid Transit District (BART).

Additionally, the performance targets adopted to evaluate the effectiveness of the land use scenario such as, reducing CO2 emissions from cars and light-duty trucks, increasing daily walking and biking, reducing transportation costs, and reducing vehicle miles traveled would all benefit from Dublin's ability to provide jobs near BART. Dublin has two BART Stations with surrounding land available to accommodate significant office development. The City is also located at the intersection of two major freeways (I-580 and I-680). Therefore, Dublin is in a unique position to leverage the existing investment in transportation infrastructure to accommodate significantly more job growth than assigned in the Preferred Scenario.

The City thanks you for the opportunity to review and comment on the Preferred Scenario. We strongly urge you to take our local plans into greater consideration when projecting household and employment growth over the next 30 years. We want to see our local plans reflected in the household and job growth allocations in the final Preferred Scenario.

Sincerely,



Jeri Ram, AICP
Community Development Director

CC: Joni Pattillo, City Manager
Chris Foss, Assistant City Manager
Jeff Baker, Planning Manager
Marnie Delgado, Senior Planner
Beth Walukas, Deputy Director of Planning

Attachments: 1) Initial Vision Scenario comment letter dated May 20, 2011
2) Alternative Scenarios comment letter dated February 8, 2012



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May 20, 2011

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Subject: Initial Vision Scenario Questions for Elected Officials

To Whom It May Concern:

Following the release of the Initial Vision Scenario in March 2011, local jurisdictions were asked to solicit input from their elected officials on a series of questions. At the May 17, 2011 Dublin City Council meeting, Staff posed the questions provided by ABAG to the City Council and obtained their approval to forward the following responses:

- 1) Is the proposed place type appropriate for your Priority Development Area(s)? Given the availability of resources, is the proposed urban scale, mix of uses, and expected household growth appropriate?

All of Dublin's PDAs have a Place Type designation of "Suburban Center". The City feels that this is the most appropriate Place Type designation based on the characteristics of Dublin's 3 PDAs (Dublin Town Center, Dublin Transit Center/Dublin Crossings and Downtown Dublin Specific Plan Area). The City is unclear as to the rationale for the allocation of housing units within designated PDAs and does not believe that the Initial Vision Scenario's expected household growth rate is appropriate. The City requests that the allocation of housing units be adjusted to align with Dublin's current Planning documents for each PDA. This would include 6,072 housing units in the Dublin Town Center PDA; 3,300 housing units in the Dublin Transit Center/Dublin Crossing PDA; and 1,300 housing units in the Downtown Dublin Specific Plan PDA.

- 2) What transportation improvements would help to support those Priority Development Area(s) in your jurisdiction?

Transportation and infrastructure has been sized to accommodate the development potential anticipated by the City of Dublin. The allocation of housing units within the Initial Vision Scenario exceeds what is planned, and likely to occur, within the Dublin Town Center and Downtown Dublin Specific Plan Area PDAs; therefore, additional analysis would need to be done. Street improvements and pedestrian enhancements within the Downtown Dublin Specific Plan Area PDA would help support and encourage planned transit oriented development within this PDA by making streets and sidewalks more pedestrian friendly. Improvements to the Iron Horse Trail from Dougherty Road to Dublin Boulevard and the widening of Dougherty Road to accommodate transit and bicyclists would encourage and facilitate greater pedestrian and bicycle access to the Dublin Transit Center/Dublin Crossings PDA. Additionally, a pedestrian and bicycle bridge overcrossing along the Iron Horse Trail at Dougherty Road and at Dublin Boulevard would increase pedestrian and bicycle safety at these roadway crossings.

- 3) What additional funding would be needed to support housing growth?

The City of Dublin is unclear as to the rationale for the allocation of housing units within designated PDAs and does not believe that the Initial Vision Scenario's expected household growth rate is appropriate. The City requests that the allocation of housing units be adjusted to align with current City of Dublin Planning documents for each PDA. The maximum development potential for each PDA is as follows:

Priority Development Area (PDA)	PDA Housing Unit Number	Revised PDA Housing Unit Number	IVS Housing Unit Number	Difference
Dublin Town Center	4,108	6,072	6,672	+600
Dublin Transit Center/ Dublin Crossings	3,796	3,300	2,541	-759
Downtown Dublin Specific Plan	541	1,300	2,156	+856
Totals	8,445	10,672	11,369	+697

- 4) If the Initial Vision Scenario growth estimate is too high, should some of the growth be shifted to another part of your jurisdiction, elsewhere in the County or elsewhere in the region?

The Initial Vision Scenario growth estimates exceed what is planned for the Dublin Town Center and Downtown Dublin Specific Plan Area PDAs and is lower than what is planned or anticipated for the Dublin Transit Center/Dublin Crossings PDA. Some of the development potential could be shifted from the Dublin Town Center and/or Downtown Dublin Specific Plan Area PDAs to the Dublin Transit Center/Dublin Crossings PDA;

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 Page 3 of 3
 May 20, 2011

however, Dublin's PDAs are not planned to accommodate all of the housing units the Initial vision Scenario allocates.

The City of Dublin believes the job growth identified in the Initial Vision Scenario falls short of the actual potential for growth. The City estimates 44,901 jobs at ultimate build out with approximately 17,994 of those jobs being within PDAs. Dublin is a major job center in the Tri-Valley and has zoned up to 2 million square feet of campus office development at the Dublin Transit Center; an additional 150,000 square of office development along with a 150-room hotel has been zoned for at the West Dublin BART Station.

- 5) What are the challenges for your local jurisdiction to attract and retain jobs that match your local workforce?

The physical layout of Dublin as a linear community primarily along I-580, lends itself to being attractive for retail uses, thus retail jobs. This is in stark contrast to the housing stock and real estate prices in Dublin, which attract a skilled, high wage workforce that exceeds what the market can provide in retail-oriented jobs. With respect to the market for office development, Dublin sits between two of the largest business parks in Northern California with ample space to accommodate users. However, Dublin has found a niche with campus office and corporate office for businesses wanting the visibility that comes with being located along I-580. This creates the potential for attracting high paying jobs in a variety of office sectors and capturing some of the work force that commutes from the San Joaquin Valley. When it comes to industrial lands, the land values and development fees are generally too high to support construction of large scale industrial development.

We appreciate the opportunity to review and comment on the Initial Vision Scenario and respectfully request that the housing unit allocations and job growth projections to our three Priority Development Areas be adjusted in the Detailed Scenario to reflect the development potential planned for in existing City of Dublin Planning documents.

Regards,



Jeri Ram, AICP
 Community Development Director

CC: Joni Pattillo, City Manager
 Chris Foss, Assistant City Manager
 Jeff Baker, Planning Manager
 Marnie Waffle, Senior Planner



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February 8, 2012

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Subject: Local Government Feedback on Alternative Scenarios

To Whom It May Concern:

At the February 7, 2012 City Council meeting Staff presented the alternative land use scenarios and performance targets analysis to the Dublin City Council and solicited their feedback.

Of all of the land use scenarios, the Core Constrained Scenario, while underestimating household growth in each of Dublin's three Priority Development Areas (PDAs) and Citywide, most closely aligns with the level of household growth anticipated in the City's General Plan, Eastern Dublin Specific Plan and Downtown Dublin Specific Plan (see Table 1 on next page).

The Focused Scenario is also relatively close to the level of household growth anticipated in Dublin except that it overestimates households in the Downtown Dublin PDA.

The Downtown Dublin Specific Plan and associated Environmental Impact Report were adopted in February 2011 and increased the development potential in the Downtown Dublin PDA by 661 units. Any additional housing development would require an amendment to the Downtown Dublin Specific Plan, environmental review and an evaluation of infrastructure needs. A funding source would also need to be identified to cover the costs associated with a Specific Plan amendment, environmental review and infrastructure upgrades.

Table 1. Household Growth Estimates (2040)

	(1) Initial Vision Scenario	(2) Core Concentration Unconstrained Scenario	(3) Focused Scenario	(4) Core Concentration Constrained Scenario	(5) Outward Growth Scenario	City Estimates
Downtown Dublin PDA	2,309	1,643	1,822	1,262	2,127	1,634 ¹
Town Center PDA	7,120	7,503	5,895	5,895	6,460	5,949 ^{2,3}
Transit Center PDA	2,454	3,736	3,204	3,204	3,970	3,400 ⁴
Total In PDAs	11,883	12,882	10,921	10,361	12,557	10,983
Total Outside PDAs	23,247	20,794	17,803	15,452	18,134	17,718 ⁵
Citywide Total	35,130	33,676	28,724	25,813	30,691	28,701

¹334 existing units as of 2011; 1,300 new units per the Downtown Dublin Specific Plan

²Based on approved entitlements and units remaining per the Eastern Dublin Specific Plan

³85 units could be added if the Area G Public/Semi-Public site is converted to residential

⁴1,800 units at the Dublin Transit Center and 1,600 units at Camp Parks/SunCal

⁵2,021 units may be added if the following are entitled: Doolan Canyon (1,990), Positano P/SP(12) and Area F P/SP (19)

With respect to employment growth, all five land use scenarios grossly underestimate future employment growth in the Town Center PDA and Transit Center PDA (see Table 2 on next page).

For the purposes of comparison, Dublin assumes full build out by 2040 whereas the three constrained land use scenarios (Focused Scenario, Core Concentration Scenario and Outward Growth Scenario) reflect very little employment growth over the next 30 years (2010-2040).

In the Town Center PDA and Transit Center PDA, the constrained land use scenarios assume only ± 200 additional jobs over the next 30 years. Failure to recognize the job growth potential within the Transit Center PDA undermines the value of this PDA and its close proximity to the Dublin/Pleasanton BART Station.

In the Town Center PDA, vacant land designated for general commercial at the intersection of two major thoroughfares, Dublin Boulevard and Tassajara Road, makes this a prime location for retail and has generated a lot of interest within the development community. It is unrealistic to assume that this land will remain vacant for the next 30 years.

Table 2. Employment Growth Estimates (2040)

	(1) Initial Vision Scenario	(2) Core Concentration Unconstrained Scenario	(3) Focused Scenario	(4) Core Concentration Constrained Scenario	(5) Outward Growth Scenario	City Estimates
Downtown Dublin PDA	14,189	9,505	5,749	5,644	6,018	5,952
Town Center PDA	2,387	765	548	545	593	3,014
Transit Center PDA	1,735	204	171	161	204	9,028
Total In PDAs	18,311	10,474	6,468	6,350	6,815	17,994
Total Outside PDAs	18,169	22,045	16,592	16,083	20,554	26,907
Citywide Total	36,480	32,519	23,060	22,433	27,369	44,901

The City thanks you for the opportunity to review and comment on the Alternative Scenarios. We respectfully request that local plans be taken into greater consideration when looking at projected household and employment growth over the next 30 years. We hope that our comments provide additional insight and are reflected in the household and job growth allocations in the Preferred Scenario.

Sincerely,



Jeri Ram, AICP
 Community Development Director

CC: Joni Pattillo, City Manager
 Chris Foss, Assistant City Manager
 Jeff Baker, Planning Manager
 Marnie Delgado, Senior Planner



METROPOLITAN
TRANSPORTATION
COMMISSION



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May 3, 2012

Mr. Curtis Williams
Director of Planning
City of Palo Alto
250 Hamilton Avenue
Palo Alto, CA 94301

RE: Comments on Plan Bay Area

Dear Mr. Williams:

Thank you for your correspondence dated April 18 and March 5, 2012, to ABAG concerning the Plan Bay Area Jobs-Housing Connection Scenario, Transportation Investment Strategy and Alternative Scenarios.

Your comments will be presented to ABAG and MTC board members. Since the inception of Plan Bay Area, we have received numerous letters such as yours with detailed and thoughtful comments. ABAG and MTC staffs will present recommendations on a Preferred Scenario at a joint MTC Planning and ABAG Administrative Committee meeting on May 11, 2012.

Both agencies will meet jointly again on May 17 to approve a final Preferred Scenario. This will provide the basis for a draft Sustainable Communities Strategy (SCS) which will undergo an environmental assessment through the remainder of the calendar year. The draft SCS will be released at the end of this year, with adoption of a final SCS slated for April 2013.

We appreciate your concerns and suggestions. The outcome of this major planning effort will be better thanks to your participation.

Sincerely,

A handwritten signature in black ink, appearing to read 'Doug Kimsey'.

Doug Kimsey
Planning Director
Metropolitan Transportation Commission

A handwritten signature in black ink, appearing to read 'Kenneth Kirkey'.

Kenneth Kirkey
Planning Director
Association of Bay Area Governments

From: "Williams, Curtis" <Curtis.Williams@CityofPaloAlto.org>
To: Kenneth Kirkey <KennethK@abag.ca.gov>
CC: "Hingw@abag.ca.gov" <Hingw@abag.ca.gov>, "Charles Carter(cscarter@stanford.edu)" <cscarter@stanford.edu>, "bill.shoe@pln.sccgov.org" <bill.shoe@pln.sccgov.org>
Date: 4/18/2012 11:07 AM
Subject: Palo Alto/Stanford/County Housing Allocations

Ken,

Thank you for the release of tract-specific data regarding the employment and housing distributions outlined in the Jobs-Housing Connection Scenario. That's very helpful to understand the focus on PDAs, and the information shows a significant improvement over earlier iterations of the plan, particularly in directing new development away from existing single-family residential areas.

The City of Palo Alto has one major initial question/concern about the distribution. It appears that little of the housing (and jobs) is shown in the Stanford campus area of unincorporated Santa Clara County, despite plans by Stanford to accommodate over 1,500 new housing units and 1 million square feet of new non-residential space on the campus between now and 2025. Please see the latest update of development according to the County's General Use Permit (GUP) and Community Plan for Stanford at: [http://www.sccplanning.org/SCC/docs/Planning,%20Office%20of%20\(DEP\)/attachments/Stanford/AR10_all.pdf](http://www.sccplanning.org/SCC/docs/Planning,%20Office%20of%20(DEP)/attachments/Stanford/AR10_all.pdf).

This issue also applies to the RHNA estimate for 2014-2022, as most of the General Use Permit timeframe falls within this planning period. Hing Wong has indicated that some 90+ housing units were reallocated from the City to the County, and that the County's allocation is about 260 units, but the 90 units is an order of magnitude less than Stanford's plans per the GUP. Could you please provide some help in understanding how those Stanford units are being accounted for? I have copied Charles Carter at Stanford and Bill Shoe at the County to be sure they are involved in this conversation.

Thanks very much.

[cid:image001.png@01CD1C9B.270A2FA0]

Curtis S. Williams | Director of Planning and Community Environment

250 Hamilton Avenue | Palo Alto, CA 94301

D: 650.329.2321 | E: Curtis.Williams@cityofpaloalto.org<mailto:Curtis.Williams@cityofpaloalto.org>

Please think of the environment before printing this email - Thank you!

City of Palo Alto
Office of the Mayor and City Council

March 5, 2012

Mr. Mark Luce, President
Association of Bay Area Governments
Joseph P. Bort Metro Center
P.O. Box 2050
Oakland, CA 94607-4756

Re: City of Palo Alto Comments on Sustainable Communities Strategy (SCS) Alternative Scenarios

Dear Mr. Luce:

Association of Bay Area Governments (ABAG) staff has requested local agency comments on its proposed land use Alternative Scenarios developed as a part of the One Bay Area Sustainable Community Strategy (SCS). We look forward to the further discussion and refinement of the Preferred Scenario before the final Regional SCS is completed early in 2013. However, at this juncture we believe it is necessary for the City to express its concerns regarding the SCS Alternative Scenarios and the related regional jobs and housing forecasts, and to suggest alternative approaches to the Preferred Scenario.

This letter provides the City of Palo Alto's (City) comments, which have been formulated following the City's considerable review and analysis of the Alternative Scenarios and related regional job and housing forecasts. The City acknowledges and appreciates the fact that the SCS process will continue following release of ABAG's Preferred Scenario, scheduled for March 8, 2012. In summary, the City's concerns are as follows:

- The City of Palo Alto has been a national leader in implementing policies and programs that reduce greenhouse gas (GHG) emissions and the effectiveness of these efforts should be considered as a part of the SCS and achieving regional GHG emission reduction targets.
- The regional forecast of jobs and housing being considered as part of the SCS likely overstates future growth in the Bay Area and at a minimum is highly uncertain; ABAG should recognize the distinct possibility that actual growth rates in the Bay Area over the next 30 years may be lower and should phase job and housing allocations and implementation accordingly.
- Palo Alto's allocation of jobs and housing units under all of the Alternative Scenarios is excessive by reference to its historical growth trends and development capacity; these allocations should more accurately consider policy constraints, market feasibility, and the high infrastructure costs and local fiscal impacts of such intensive redevelopment.

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- The land use changes contemplated in the SCS Alternative Scenarios have a proportionately small contribution to achieving AB32/SB375 GHG reduction targets and there are very limited differences shown between the Alternative Scenarios; the considerable effort and investment needed to affect these land use changes should be re-directed to more cost-effective regional and local GHG reduction measures.

While the City retains serious concerns regarding the Regional Forecast of jobs and housing and also the allocation of future development under the Alternative Scenarios, Palo Alto is firmly committed to doing its share to achieve the State-mandated (AB32/SB375) GHG reduction targets. The measures already adopted by the City provide ample evidence of this commitment. Going forward, the City expects to cooperate with ABAG and our other regional partners in the future efforts needed to achieve substantial reductions in GHG emissions through realistic and achievable regional and local policies, programs, and investments.

The following items elaborate on the summary points listed above.

1. The City of Palo Alto has been a national leader in implementing policies and programs that reduce GHG emissions.

Over the past decade, the City of Palo Alto has adopted a range of policies, programs and projects to reduce GHG emissions, focused upon improving energy efficiency, enhancing multi-modal transportation alternatives to the single-occupant vehicle, and creating walkable, mixed-use districts. Implementing these policies, programs, and investments the City has become a national leader in reducing GHG emissions. Some of the key programs include:

- a. City of Palo Alto Climate Protection Plan (CPP): The CPP, adopted by the City Council in December 2007, includes goals for the reduction of CO₂ from a 2005 baseline level as a result of changes in City operations and from CO₂ reduction efforts within the community.
 - The City has surpassed its short term goal of a 5% reduction in emissions by 2009 for a total reduction of 3,266 metric tons of CO₂.
 - By 2020, the City and community will reduce emissions by 15% from 2005 levels, equal to 119,140 metric tons of CO₂, consistent with State emission reduction goals.
- b. Availability of Clean Energy: The City of Palo Alto is in a unique position as owner and operator of its electric utility to make available and provide clean energy to City customers. In this regard, the City Council adopted a goal to have 33% of the electricity supply to be provided by renewable electricity suppliers by 2015, five years in advance of the State requirement.
 - For FY2011, renewable electricity supplies account for 20% of the City's needs.
 - Contracts are in place with suppliers to provide 26% of the City's electrical needs as renewable by FY2014 with the potential to reach 30% from contracts that are still under negotiations.
 - Currently, 24% of the City's customers participate in the Palo Alto Green program, paying a surcharge on electric service to support renewable electricity supplies.
 - The City's Utilities Department is preparing a plan to be released later this year for the electric portfolio to be carbon neutral.

c. Utility Programs to Reduce Emissions: In addition to providing clean energy options for its customers, the Utilities Department offers programs such as rebates, assistance, information, and workshops to help customers increase electricity efficiency and cost savings that reduce emissions. These successes of these programs are measurable: In FY2011, Palo Alto customers reduced CO₂ emissions by 12,557 tons through the use of electric and natural gas efficiency programs, incentives for solar photovoltaic (PV) and solar hot water systems, and other program efficiencies.

d. Leadership in Green Building and Sustainable Design: In FY 2009, the City Council adopted the City's Green Building Ordinance to build a new generation of efficient buildings in Palo Alto that are environmentally responsible and healthy places in which to live and work. This program was one of the first in the nation to mandate green building requirements and certifications for virtually all public and private buildings.

- In FY 2011, the City initiated the first LEED-ND pilot program (LEED for Neighborhood Development) in the United States for assessing a development site's ability to qualify as a sustainable neighborhood project, including features that reduce dependence on automobile use, increase walkability, and encourage healthy living.
- The City also rolled out energy use disclosure requirements for existing buildings undergoing small renovation work to better understand the existing buildings' current performance and areas where education, policy, and programs can be influential in reducing energy usage.
- The amount of CO₂ diverted from the environment has increased since the adoption of the 2009 ordinance and programs. In 2010, the first full year of the ordinance, CO₂ was reduced by approximately 1,013 tons. In 2011, CO₂ was reduced by approximately 2,818 tons, a 178% increase over the previous year.
- Prior to the City's ordinance, as few as six green building projects existed throughout the City. By the end of FY 2011, more than 240 green buildings have been completed or are under construction.

e. Affordable Housing: The City of Palo Alto has been a leader in providing for affordable housing in one of the most expensive housing markets in the nation.

- In 1974, Palo Alto became one of the first cities in the United States to adopt an inclusionary housing program that required the provision of below market rate (BMR) residential units in new multiple-family dwelling projects.
- Today, the City oversees 239 ownership units and 198 rental BMR units that are available to qualified applicants. As the cost for housing in Palo Alto continues to increase, the value of these affordable units to provide housing within the urbanized Bay Area has also increased. BMR housing provides greater opportunity for lower income families to live closer to their jobs and utilize public transit.
- Recently, Palo Alto welcomed two new BMR housing projects, including the Tree House Apartments, a 35-unit complex with a Green Point Rating of 193 (the highest score in Palo Alto for multiple family housing) and Alta Torre, a 56-unit complex for very low-income seniors.
- Construction is underway at 801 Alma Street, a 50-unit family affordable project immediately adjacent to CalTrain and within walking distance to shops and services on University Avenue in downtown.

f. Higher Density Land Uses Near Transit: The City's Comprehensive Plan designates two areas of the City (downtown and California Avenue) as appropriate for "Transit Oriented Residential," in a 2,000-foot radius of the City's two Caltrain stations. These areas are identified for higher intensity residential and mixed-use development focused around a walkable, bicycle-friendly environment.

- In 2006, two years before the adoption of SB375, the City Council adopted the Pedestrian and Transit Oriented Development combining district (PTOD) for the area around the California Avenue CalTrain station. This district allows for residential densities at 40 units per acre, increased floor area ratios, increased building heights, reduced parking requirements, and density bonuses for the provision of BMR housing in mixed-use and multiple family projects.
- In 2007, Council supported the designation of this area as a Priority Development Area (PDA) as part of ABAG's FOCUS program that would eventually evolve into Plan Bay Area. This land use planning effort is one example of a pattern of early-adoption decisions made by the City Council to address growth, transit and greenhouse gas emissions within our community.
- The Council has directed that housing sites proposed in the City's Housing Element should be focused in transit-proximate areas, and that increased height and intensity may be considered in those locations.

g. Transportation Policies and Projects: The City of Palo Alto has developed transportation policies, programs and projects to implement a transit-oriented, walkable and bicycle-friendly vision that demonstrate leadership of the "Complete Streets" concept promoted by the Metropolitan Transportation Commission. Some of these key recent measures include:

- Bicycle and Pedestrian Transportation Plan: The City is completing its updated plan to accommodate enhanced bicycle and pedestrian facilities and programs, and to elevate the City's Bicycle-Friendly Community status from Gold to Platinum level.
- Stanford Avenue/El Camino Real Intersection Improvements: The City has recently completed improvements at this intersection to enhance safety for pedestrians and cyclists, including children who use the intersection as a route to school, and to upgrade the aesthetic qualities of the intersection and of El Camino Real. We expect the project will serve as a template for improving intersections throughout the Grand Boulevard corridor.
- Safe Routes to School: The City's Safe Routes to School program has resulted in a phenomenal increase in school children bicycling and walking to school over the past decade. In the 2011 fiscal year, City staff coordinated 140 in-class bike and pedestrian safety education programs in 12 elementary schools, reaching 4,250 students. Recent surveys of how children usually get to elementary school showed an average of 42% choosing to walk, bike or skate to school, compared to a national average of only 13% (figures for middle schools and high schools are even greater). A recent grant will allow the City to prepare Safe Routes maps for every elementary school in the city as well as to expand our education curriculum into middle schools and to adults.
- Traffic Calming on Residential Arterials: The City has an ambitious traffic calming program along "residential arterials" in efforts to support our Safe Routes to School program and to enhance bicycle and pedestrian safety. In particular, the ongoing

Charleston Road-Arastradero Road Corridor project has provided substantial safety improvements and selective lane reductions to enhance bicycling and walking while maintaining efficient levels of vehicle throughput similar to those prior to the traffic calming improvements.

- Bicycle Parking Corrals: The City has recently installed six green “bicycle parking corrals” in the Bay Area, with each corral providing for up to 10 bicycle parking spaces in highly visible, signed on-street areas in downtown. Up to a dozen more such installations are planned in the downtown and California Avenue areas.
- California Avenue Streetscape Improvements: A pending grant would support the substantial upgrade of California Avenue to a more pedestrian and bicycle-friendly roadway, incorporating “complete street” principles, and also enhancing access to the California Avenue Caltrain station.
- Local Shuttles: The City, with support from the Caltrain JPB, offers local shuttle services for commuters, school children, seniors and others between points of interest within the city. These shuttles further reduce the need for single-occupant vehicle trips and reduce traffic congestion and parking needs.

Accordingly, the City of Palo Alto requests that ABAG consider the effectiveness of these local GHG emission reduction efforts, incorporate them as a part of the SCS and related regional GHG reduction targets, and provide “credits” to those jurisdictions that have demonstrated implementation of meaningful GHG reduction measures.

2. The Regional Forecast of jobs and housing being considered as part of the SCS appears to overstate future growth in the Bay Area.

The regional jobs and housing forecast used for the Alternative Scenarios is lower than the forecast for the Initial Vision Scenario and the Core Concentration Unconstrained Scenario, reflecting comments received from the local agencies following review of the Initial Vision Scenario. However, in the City of Palo Alto’s view, the most recent jobs and housing forecasts for the three “constrained” Alternative Scenarios remain at the high end of plausible Bay Area jobs and housing growth over the next 30 years. The City is disappointed and dismayed at the minimal public discourse around the development of these projections, though we do appreciate Dr. Steven Levy’s recent presentation of the analysis behind the projections. At this point, however, ABAG has provided insufficient justification for the methods and results of the regional job and housing forecasts used in the Alternative Scenarios. An evaluation of the Regional Forecast prepared late last year by Councilmember Greg Schmid provides an assessment of California growth forecasts (see Attachment A), indicating the tendency for forecasts to overstate growth as compared to actual figures from the Census, and discussing some of the key factors that will influence California’s future growth.

- a. Jobs. Regarding the ABAG jobs forecast, a comparison with the last 20 years is noteworthy. Average job increases between 1990 and 2010 approximated 10,000 net new jobs annually. Excluding the three years that included the Great Recession where substantial jobs losses occurred (i.e. 2008-2010), the Bay Region added jobs at an average annual rate of 25,200 between 1990 and 2007. The ABAG jobs forecast used for the Alternative Scenarios assumes that the Region will add an average of over 33,000 jobs annually from 2010 to 2040,

a 32% increase over the pre-recession trend line. The method used to arrive at the jobs forecast assumes a “shift-share” of a national jobs growth forecast that itself is subject to question. As a part of revisions to the regional jobs forecast, ABAG should consider a more fundamental economic assessment that identifies the key industries in the Bay Area that will drive job growth and also the distinct possibility that future jobs and housing may be closer to recent historical growth trends.

- b. Housing. Regarding the ABAG housing forecast used for the Alternative Scenarios, an additional 770,800 households are shown added to the Bay Area between 2010 and 2040 - an annual average growth of 25,700 households. The average annual housing growth rate between 1990 and 2010 was 21,000. At the present time, two years into ABAG’s forecast period, the Bay Area, like much of the United States, remains in a weak housing market characterized by very limited new development, low pricing, slow sales of existing homes, tight credit, and an oversupply of homes resulting from a historically high number of foreclosed and distressed properties. These conditions are expected to continue for several more years until the existing inventory is reduced and substantial improvement in the job market and related increases in household income occurs. In any event, the Bay Area will need to be in “catch-up” mode, meaning even higher additional households per year must be realized to meet the SCS forecast growth rates, once more normal housing market conditions emerge. Moreover, ABAG’s regional housing forecast is based on a fixed share of a national population forecast prepared by the U.S. Census Bureau that presumed international immigration (primarily of Asian and Hispanic peoples) would continue and comprise approximately 80 percent of all population growth nationwide.
- c. Housing Affordability. In addition to questions regarding job growth (the ultimate cause of housing demand) there are a number of other questions regarding ABAG’s housing forecast including those related to affordability. A presentation made by Karen Chapple of UC Berkeley at the ABAG’s January Regional Advisory Working Group (RAWG) suggested that given likely wages paid by the new jobs expected, over 70 percent of all new households formed in the 2010 to 2040 period will be “moderate” income or below. In many Bay Area locations, especially the inner Bay Area urbanized areas that are the focus of growth under the SCS Alternative Scenarios, such “affordable” housing units must be subsidized in one fashion or another, either as “inclusionary” units burdened upon the market rate units constructed or by public subsidies such as (now eliminated) redevelopment agency funding and federal tax credits. Given the loss of redevelopment powers and funding and recent court cases affecting inclusionary programs (Palmer, Patterson) there is no assurance that adequate housing subsidy funding will be available.
- d. RHNA. Then there is the matter of the Regional Housing Needs Allocation (RHNA). As presently proposed, the regional forecast and related Preferred Scenario allocations to be released as a draft on March 8th will apparently serve as the basis of the future RHNA for each city and county, which will require a one-third of the overall Preferred Scenario housing allocation to cities in each 8-year “planning period” regardless of any assessment of realistic development capacity (note: recent information from ABAG indicates that less than one-third of the 2010-2040 forecast is likely for the 2015-2022 period, however, due to the economic

housing downturn). This approach seems highly arbitrary, insensitive to local conditions and constraints, and far beyond what can realistically be expected from an economic perspective.

Accordingly, given all of these concerns, the City strongly recommends that the jobs and housing forecasts for the Preferred Scenario be reduced to reflect more accurately current conditions, historical trends, and more fundamental assessment of economic (job) growth potential in the Bay Area. Developing a more realistic jobs and housing forecast would reduce the implied need to intensify land uses, reduce projected GHG emissions by lowering energy consumption, congestion and single occupancy vehicle trips, and require less costly transit and highway infrastructure investments. The SCS effort is to be revisited and updated every four years, so that there would be future opportunities to re-evaluate whether a higher forecast is appropriate and adjustments would be needed.

3. Palo Alto's allocation of jobs and housing units under the Alternative Scenarios is highly unrealistic and excessive relative to historical growth trends and development capacity.

Santa Clara County dominates all other Bay Area counties in the allocation of ABAG's regional forecast of jobs and housing, absorbing 30 percent of the regional job forecast and 26 percent of the regional housing forecast. Palo Alto is allocated new jobs ranging from 18,040 (Outward Growth) to 26,070 (Focused Growth). Palo Alto households allocated range from 6,107 (Outward Growth) to 12,250 (Constrained Core Concentration and Focused Growth). These allocations have been made without regard to existing development capacity in Palo Alto (use of remaining vacant land and redevelopment of existing developed areas), the likely match between new household affordability and local housing prices, or a range of other potential local costs for achieving the required high density development.

- a. Jobs. The City presently contains approximately 62,300 jobs, according to ABAG. During the past decade (2000 to 2010), Palo Alto experienced a 14 percent decline in employment reflecting the combined effect of the "dot-com" bust and the Great Recession. While economic conditions are expected to improve, there have been structural changes in technology industries that have driven growth in the Silicon Valley over the past 50 years that portend only modest growth. The Alternative Scenarios assume that Palo Alto's job growth by 2040 will increase over the 2010 estimate by between 27 percent and 40 percent.
- b. Housing. The housing projections in the Alternative Scenarios represent a 25-50 percent increase in housing units from 2010-2040, up to approximately 400 new units per year. The City has in the past 40 years (1970-2010) produced an average of 148 units per year. To more than double that output in a relatively built-out city is again entirely unrealistic and using such an assumption as the basis for growth scenarios and transportation investments will likely result in failure of the planning effort.
- c. Constraints. The City of Palo Alto is highly built out, and the existing limited number of vacant sites and redevelopment opportunity sites severely limit how the households and jobs allocated to Palo Alto in the SCS Alternative Scenarios could be accommodated. The "constrained" scenarios clearly do not appear to consider the many constraints to new development in Palo Alto, including limited school capacity and funding for infrastructure.

Accordingly, the City requests that the allocations of jobs and housing units in Palo Alto should be lowered substantially to more accurately consider policy constraints, market feasibility, and infrastructure and local fiscal impacts of such intensive redevelopment.

4. The land use changes contemplated in the SCS Alternative Scenarios have a proportionately small contribution to achieving AB32/SB375 GHG reduction targets.

The AB32/SB375 target for California is a reduction to 85 million equivalent metric tons per year by 2050, an 80 percent reduction from current levels. To return to 1990 levels of 427 million tons, an 80 million ton reduction of projected 2020 levels is required. Of this 80 million ton reduction, approximately 96 percent is proposed to be achieved from improved fuel standards, energy efficiency, industrial measures, and other methods needed to curb emissions from the construction, manufacturing, and agricultural sectors. Only four percent, however, or 3.2 million tons, would be achieved by altering land use patterns. This is shown effectively on the graph (Attachment B) prepared by the Contra Costa County Transportation Authority (CCTA) in their letter dated February 15, 2012.

- a. Negligible Difference Between Alternatives: The potential contributions of the land use changes contemplated in the SCS Alternative Scenarios show reductions in GHG emissions through 2040 range from 7.9 percent (Outward Growth) to 9.4 percent (Constrained Core Concentration). Compared to the initial Current Regional Plan Scenario, the Alternative Scenarios reduce GHG emissions by 0.9 percent to 2.4 percent of the remaining 4 percent affected by land use and transportation patterns. This is a negligible difference between the land use scenarios and argues for a more flexible approach that combines other GHG emission reduction strategies with a more realistic land use scenario.
- b. Regional Transportation Pricing and Policies: The MTC analysis of various transportation pricing and policy changes (e.g., telecommuting, electric vehicle strategies, parking pricing) may account for at least a 6.5% further reduction in GHG emissions, considerably more significant than the differences between the land use patterns in the Alternative Scenarios.
- c. Cost Effectiveness. Given the numerous challenges associated with fundamental changes in the way that Bay Area land use patterns would otherwise evolve, including wholesale changes to land use regulations, presuming changes in market characteristics and preferences of homebuyers, and the need for substantial public investments and subsidies, we question the feasibility and cost-effectiveness of the Alternative Scenarios. Regarding market feasibility, there is no evidence that the resulting housing capacity and prototypes would match buyer preferences and affordability. Regarding cost-effectiveness, the comparable costs (mostly borne by local jurisdictions) of implementing the Alternative Scenarios may be far higher than other alternatives for achieving comparable GHG emission reductions.

Accordingly, the City of Palo Alto recommends that a performance-based approach, involving establishing GHG reduction targets for the local jurisdictions along with a menu of options for achieving these targets (including feasible and realistic alterations in land use policy) should become the basis of the proposed SCS.

Conclusion

In conclusion, the City of Palo Alto suggests that the Preferred Scenario for the Sustainability Communities Strategy should include:

- A focus on GHG emission reductions, with the flexibility for each city and county to provide for a reasonable minimum amount of housing plus options for other commitments to GHG emission reductions;
- Grant funding for transportation and planning oriented to Priority Development Areas (PDAs);
- Realistic housing forecasts limited to each upcoming 8-year RHNA cycle, with review every four years to update projections; and
- Longer range projections that are not allocated to cities and counties, but are used to provide context for regional transportation investments.

Thank you again for the opportunity to comment in advance of your proposal for a Draft Preferred Scenario. If you have questions or need additional information, please contact Curtis Williams, the City's Director of Planning and Community Environment, at (650) 329-2321 or curtis.williams@cityofpaloalto.org.

Sincerely,



f. Yiaway Yeh
Mayor
City of Palo Alto

Attachments:

Attachment A: November 15, 2011 Memorandum: "California Demographic Forecasts: Why are the Numbers Overestimated," prepared by City of Palo Alto Councilmember Greg Schmid

Attachment B: "Regional Land Use and Transportation SCS: Achieving Statewide GHG Reduction Rates," prepared for Contra Costa Transportation Authority

cc: Adrienne J. Tissier, Chair, Metropolitan Transportation Commission
Steve Heminger, Metropolitan Transportation Commission
Ezra Rapport, Association of Bay Area Governments
John Ristow, Valley Transportation Authority
Palo Alto City Council

California Demographic Forecasts: Why are the numbers over-estimated?

Prepared by City of Palo Alto

November 15, 2011

Actual California Population growth

Over the last decade, the state of California added 3.4 million people, to reach a total of 37.3 million. This was an increase of 10% over the decade. This growth rate follows the gradual slowing that started after 1990, down dramatically from the very high rates of the post-World War II era. Note that the Department of Finance's (DOF) 2007 projections reflect a very high growth perspective. The DOF numbers are currently used as the population forecasts for all state and local projects—they are not scheduled to be revised until 2013.

Table 1. California's population growth over the last five decades
(average growth from census to census)

	<u>Census</u>	<u>Dept of Finance Projections (2007)</u>
1960s	29.2	
1970s	18.5	
1980s	25.7	
1990s	13.8	
2000s	10.0	14.8
2010s		12.8
2020s		11.6
2030s		10.2

Source: US Census Bureau actual Census numbers; California Department of Finance 2007 Projections.

Recent State forecasts have been consistently over-estimated

Even after the sharp decline in growth during the 1990s, forecasters consistently tended to be overly optimistic about population growth rates through the 2000s. In 2005, the Public Policy Institute of California issued a report ("California 2025: Taking on the Future") that included the population projections of all the key demographic forecasters. The consensus forecast from this group was some 40% higher than the actual outcome for the state:

Table 2. California Population Forecasts for 2010 made before 2005

(Percentage growth expected from 2000-2010)

California Dept of Finance	15.2
USC Population Dynamics	11.6
UC Berkeley (Lee, Miller)	13.9*
Public Policy Institute of CA	15.2*
CCSCE	17.2
UCLA Anderson Forecasting	16.6

Average of six 2005 forecasts 15.0

*=center point of band

Source: Public Policy Institute of California, "California 2025: Taking on the Future", 2005, Page 29.

The consensus forecast was some 50% above the actual numbers. The only forecaster who produced a number below the actual 10% growth was the UC Berkeley group who stated that there was a 5% chance that the growth rate would be lower than 7.1%. The 2005 PPIC Report stated that "Recent trends make population projections for California especially difficult...For these reasons, planners should consider alternative population scenarios ... as useful alternatives for planners." (PPIC, 2005, pages 27-28)

Even as late as the end of 2009, on the eve of the decennial census, estimates by the California Dept. of Finance (the organization responsible for the numbers that are used for all state allocation formulas) remained strikingly high at 14.1% which was 1.5 million or 44.7% above the above the contemporaneous and more accurate Census Bureau's Current Population Estimates.

Critical Components of Change and the Future

The Census data provide a nice detailed perspective on the actual components of change during the decade. While the 3.1 million people added through natural increase (births minus deaths) were the largest single growth factor, the 2 million net gain from foreign immigration was important in overcoming a net outflow of 1.6 million from native born emigration, primarily to other states.

Table 3. Components of Population Change in California, 2000-2010

(millions of people)	
Births	+5.45
Deaths	-2.35
Net Domestic migration	-1.63
Foreign immigration	+2.58
Foreign emigration	-0.59
Military, etc	-0.07
TOTAL	+3.38

Source: USC, Population Dynamics Research Group, "What the Census would show", February 2011.

The challenge for projecting change in the future is the dramatic shifts in some of these base categories. With the aging population, we know that, even with slight increases in longevity, the aging population in California will raise the annual number of deaths in California from 271K in 2011 to 462K in 2039, while the number of births will rise slightly from 532K in 2011 to 551 in 2039. The natural increase will fall from some 260K today to 90K in 2040.

Thus, over time any increase in California's population will increasingly rely on migration. Since net domestic migration has averaged a net outflow of some 160K per year since the early 1990s, any growth in population will be increasingly dependent on foreign migration. (Source: USC, Population Dynamics Groups, April 2011).

There is little reason to see a major shift in domestic migration with California's high cost and high unemployment rate. That leaves foreign migration as the critical component source of long-term population growth. The most dynamic source for California's growth has been immigration from Mexico, both legal and illegal. All observers (The Dept of Homeland Security, the Pew Charitable Trust Hispanic Center, and the Mexican Migration Project at Princeton) agree that net immigration from Mexico has been down dramatically in recent years with the stricter enforcement of border crossing and the prolonged recession in the US. Pew estimates that the illegal immigrant population in the US fell by some 7% between 2007 and 2010. The important debate about the future is whether this is a business cycle phenomenon or part of a longer term trend.

The group that has the best data source and takes the longer term look is the Mexican Migration Project at Princeton. For decades they have been tracking migration patterns from Mexico and doing annual surveys of thousands of families from migration centers in Mexico. They found that the percent of first time immigrants from the Mexican communities of highest immigration fell from 1.2% of adults in 2000 to 0.6% in 2005 to zero in 2010. They identify that the changes are due to Mexican demographic and

economic factors as much as from U.S. conditions. They identified five internal factors of change in Mexico:

- Fertility rates are falling dramatically from 6.8 births per women in 1970 to 2.8 in 1995 to 2 in 2010 (replacement level).
- The number of young people entering the labor market has fallen from one million a year in the 1990s to 700K today and demographic factors will bring that down to about 300K in 2030, not enough to meet local job needs.
- The rate of college attendance and college completion has doubled over the last decade, raising the career path of an increasing share of young workers.
- The wage disparity between Mexico and the U.S. is narrowing sharply with average wage gaps falling from 10:1 in the 1960s to some 3.7:1 in the early 2000s.
- The cost of migration has risen dramatically for illegal entrants, further narrowing the earnings gap.

All of these factors point to the need, at the least, of looking at alternative scenarios of population growth in California that are more sensitive to possible underlying changes in migration patterns.

Sources of Demographic projections about California

US Bureau of the Census (responsible for the decennial census and does updated estimates each year of state populations—has been much closer to actual numbers than the Cal Dept. of Finance)

California Department of Finance (responsible for state population estimates between the Census years—forecasts used as key source for state government planning). Statewide estimates for 2010 (made in 2009) were 41% higher than the 2010 Census numbers for the state, 83% over for the nine Bay Area counties and 137% higher for the three West Bay counties.

Ronald Lee, UC Berkeley, Center for Economics and Demographics of Aging, “Special Report: The Growth & Aging of California’s Population”, 2003 (an important report that identified the detailed assumptions that went into the Department of Finance’s long-term projections).

Hans Johnson, Public Policy Institute of California, “California 2025: Taking on the Future”, Chapter 2 ‘California’s Population in 2025’ (a report that gathered projections from eight academic and government sources). Johnson concluded that “population projections for California are especially difficult...In addition to overweighting contemporary trends, forecasters are notoriously bad at predicting fundamental demographic shifts... For these reasons, planners should consider alternative population scenarios.” Pages 27-28.

John Pitkin & Dowell Myers, USC Population Dynamics Research Group, “The 2010 Census Benchmark for California’s Growing and Changing Population”, February 2011; “Projections of the Population of California by Nativity and Year of Entry to the U.S.”, April 2, 2011. (Pitkin and Myers had the lowest of the forecasts in the 2005 study—though still overestimating growth by 16%. They are working with the California Department of Finance on components for a new longer-term forecast; they are still assuming a net immigration number of 160,000 holding steady in the future.)

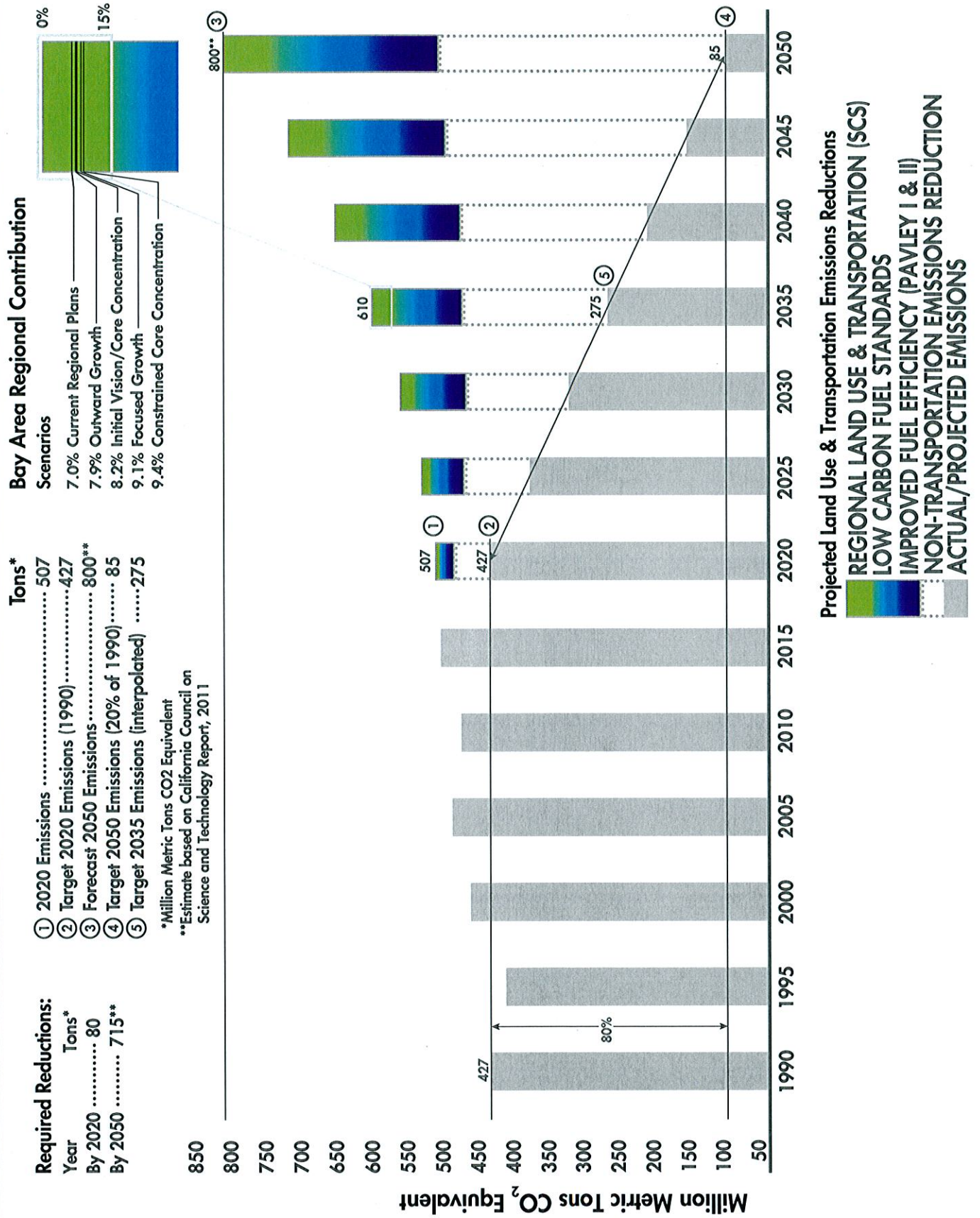
Steve Levy, Center for the Continuing Study of the California Economy

UCLA Anderson Forecasting Project

Greg Schmid

October 2011

**FIGURE 3: Regional Land Use and Transportation SCS
ACHIEVING STATEWIDE GHG REDUCTION TARGETS**





METROPOLITAN
TRANSPORTATION
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Association of
Bay Area Governments

#23

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May 2, 2012

Ms. Diane Henderson
Interim Planning Director
Town of San Anselmo
525 San Anselmo Avenue
San Anselmo, CA 94960-2682

RE: Comments on Plan Bay Area

Dear Ms. Henderson:

Thank you for your correspondence dated 4/18/2012 to Ezra Rapport concerning the Plan Bay Area Jobs-Housing Scenario and Transportation Investment Strategy.

Your comments will be presented to ABAG and MTC board members. Since the inception of Plan Bay Area, we have received numerous letters such as yours with detailed and thoughtful comments. ABAG and MTC staffs will present recommendations on a Preferred Scenario at a joint MTC Planning and ABAG Administrative Committee meeting on May 11, 2012.

Both agencies will meet jointly again on May 17 to approve a final Preferred Scenario. This will provide the basis for a draft Sustainable Communities Strategy (SCS) which will undergo an environmental assessment through the remainder of the calendar year. The draft SCS will be released at the end of this year, with adoption of a final SCS slated for April 2013.

We appreciate your concerns and suggestions. The outcome of this major planning effort will be better thanks to your participation.

Sincerely,

Doug Kimsey
Planning Director
Metropolitan Transportation Commission

Kenneth Kirkey
Planning Director
Association of Bay Area Governments

Tom McInerney
Mayor

Kay Coleman
Vice Mayor



Ford Greene
Councilmember

Jeff Kroot
Councilmember

Lori Lopin
Councilmember

525 San Anselmo Avenue, San Anselmo, CA 94960-2682
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April 18, 2012

Ezra Rapport, Executive Director
Association of Bay Area Governments
P.O. Box 2050
Oakland, CA 94604-2050

RE: Town of San Anselmo Comments on Plan Bay Area, Draft Preferred SCS Scenario,
"Jobs-Housing Connection Scenario"

Dear Mr. Rapport:

This letter is in response to the Association of Bay Area Governments' request for comments on the Sustainable Communities Strategy (SCS) Preferred Alternative. On behalf of the Town of San Anselmo, I am requesting that ABAG revisit the employment and housing numbers projected for the Town of San Anselmo in the Draft Preferred Alternative and reduce these projections to more realistic numbers.

The Sustainable Communities Strategy (SCS) was born out of AB 32 and SB 375 which mandate an integrated approach to land use and transportation in an effort to reduce greenhouse gas (GHG) emissions. The Town of San Anselmo is committed to reducing GHG emissions and believes that the SCS's challenging approach to land use changes set forth in the Preferred Alternative should be redirected to more cost-effective regional and local GHG reduction measures.

San Anselmo is a small town (approximately 1,720 acres of land) situated in a series of small valleys created by streams which are bordered by moderate to steep hillside slopes and ridge tops. San Anselmo is an established residential community of older neighborhoods, with few opportunities for new housing construction on infill lots which tend to be vacant due to existing constraints. Because of these conditions, San Anselmo has experienced a static growth rate over the past several decades. The Land Use Element of the 1988 General Plan stated that the Town at that time (nearly 25 years ago) was "95% built out from a housing standpoint".

Much of San Anselmo is located in FEMA floodplains and was subject to massive flooding on December 31, 2005. The location of residential and commercial properties in the flatlands has severely limited future development potential due to flooding. FEMA has recently introduced a preliminary version of the new Flood Hazard Maps, which for the first time include a “Floodway” designation in addition to the Floodplain designation. The designation is quite extensive and it is unclear at this preliminary stage what additional constraints that will put on residential and commercial development within San Anselmo’s downtown and flatlands.

The SCS Preferred Scenario includes a 23% increase in employment in San Anselmo, as compared with a 17% increase for Marin County as a whole, and an 8% increase in housing units in San Anselmo as compared with a 7% increase for Marin County as a whole. These numbers are contrary to current and historical trends for both the Town of San Anselmo and the Bay Area.

The largest property owner in the Town of San Anselmo is San Francisco Theological Seminary (SFTS). Historically, SFTS has housed students and faculty both on campus and off-site, in single and multi-family units within the Town’s corporate limits. Over the past several decades, SFTS has experienced a significant decline in enrollment. In 2010, in response to changes in patterns of enrollment and changes in the economy, SFTS made application to the Town to amend their Master Plan to consolidate all housing on the campus and sell off-campus housing. As part of the Master Plan amendment, SFTS will sell all off-campus properties and use the money to fund the new on-site improvements. The effect of this will be that 18 single-family residential units and 39 multi-family units (located in 6 buildings) will enter the housing market in San Anselmo, adding 57 units to the San Anselmo housing stock that have not previously been available to the public. Although these units are not new construction, they are new to the open housing stock of San Anselmo. This availability of housing units is unique to San Anselmo and should be taken into consideration when reviewing housing projections.

The Town promotes sustainability, and believes that we can most successfully reduce GHG emissions by continuing our work as a leader in sustainability, based on the following:

- For several years San Anselmo has provided a leadership role on the Marin Hazardous and Solid Waste Management Joint Powers Authority (JPA). The JPA has established a Zero Waste Goal of achieving 80 percent waste reduction by 2012 and zero disposal by 2025.
- In 2010, San Anselmo adopted a mandatory Green Building Ordinance. The purpose of the ordinance is to enhance the long-term public health and welfare by contributing to the overall reduction of GHG production and emissions and improving the environmental and economic health of the Town through the efficient design, construction, operation, maintenance and deconstruction of buildings and site development by incorporating green building practices and materials.
- San Anselmo adopted a Climate Action Plan on April 26, 2011 which includes recommended actions to achieve zero waste going to landfills and to reduce GHG emissions to 15% below 2005 levels by 2020. In fact, the Town is actually on track to reduce GHG emissions more than 20% below 2005 levels by 2020.
- In March, 2012, San Anselmo adopted a Construction and Demolition Debris Ordinance (C & D Ordinance) to address the collection, recycling and disposal of waste generated

from construction, demolition and renovation projects. Currently, inert and mixed construction and demolition waste constitutes approximately 16% of the materials sent to landfills in Marin County and a similarly large portion of the waste stream in San Anselmo. These materials have significant potential for reduction and recycling, and the C & D Ordinance adopted by the Town will facilitate such reuse.

- San Anselmo has secured funding for electric car charging stations which will be located in the Town's public parking lot.
- Electric cars park for free while others pay to park in the Town's fee lots.
- San Anselmo has chosen to participate in Marin Clean Energy (MCE), California's first community choice aggregation program. MCE offers renewable energy as an alternative to conventional PG&E service.

Finally, San Anselmo is committed to policies and programs that promote a walkable and bicycle-friendly community.

- San Anselmo has actively pursued projects through the Safe Paths to Schools and Safe Routes to Schools programs. In this fiscal year alone, the Town will spend \$620,000 improving pedestrian and bike travel through the Safe Routes to Schools program.
- The Town has installed more than 70 ADA ramps on San Anselmo sidewalks in the past two years, more than any other Marin County jurisdiction.

The Town of San Anselmo strongly believes that our draft employment and housing forecasts in the SCS Preferred Alternative must be reduced to reflect our small town, limited resources, current conditions, Bay Area and local trends, and the Town's proven track record in our commitment to sustainability and improving opportunities to increase walking and cycling for local trips. We believe that a performance-based approach, establishing target GHG numbers for jurisdictions with a range of options (including land use policies) for achieving these targets would be a better approach to the SCS. We look forward to working with ABAG on our common goal of creating sustainable communities. Please contact me if you have any questions or if you need additional information.

Sincerely,

Diane M. Henderson, AICP
Interim Planning Director

cc: Debra Stutsman, Town Manager
Mayor and Councilmembers
Ken Kirkey, ABAG



METROPOLITAN
TRANSPORTATION
COMMISSION



Association of
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May 3, 2012

Ms. Lisa Kranz
Supervising Planner
City of Santa Rosa
100 Santa Rosa Ave., Room 3
Santa Rosa, CA 95404

RE: Comments on Plan Bay Area

Dear Ms. Kranz:

Thank you for your correspondence dated April 18, 2012, to Athena Ullah concerning the Plan Bay Area Jobs-Housing Connection Scenario and Transportation Investment Strategy.

Your comments will be presented to ABAG and MTC board members. Since the inception of Plan Bay Area, we have received numerous letters such as yours with detailed and thoughtful comments. ABAG and MTC staffs will present recommendations on a Preferred Scenario at a joint MTC Planning and ABAG Administrative Committee meeting on May 11, 2012.

Both agencies will meet jointly again on May 17 to approve a final Preferred Scenario. This will provide the basis for a draft Sustainable Communities Strategy (SCS) which will undergo an environmental assessment through the remainder of the calendar year. The draft SCS will be released at the end of this year, with adoption of a final SCS slated for April 2013.

We appreciate your concerns and suggestions. The outcome of this major planning effort will be better thanks to your participation.

Sincerely,

Doug Kimsey
Planning Director
Metropolitan Transportation Commission

Kenneth Kirkey
Planning Director
Association of Bay Area Governments

April 18, 2012

#24

Athena:

You requested comments on the draft Jobs-Housing Connection Scenario, specifically regarding local PDA housing unit growth and housing unit growth overall. The following attempts to provide some general feedback.

In terms of estimated units in 2010 for Santa Rosa's five PDAs, the ABAG and local estimates are relatively close. However, local housing unit growth for 2010-2040 (column N) is overstated, particularly for the downtown area. The spreadsheet illustrates local estimates at 5,753 units, while the adopted Downtown Station Area Specific Plan projects about 3,300 units in the area.

As for housing unit growth projected for PDAs (column Y), future growth is significantly overstated for the downtown plan area, with 7,000 new units indicated, about 4,300 units more than adopted policy as noted above. Unit growth is also higher in the north station area by about 1,200 units, based on a draft plan for that area, and in Roseland by about 1,300 units. Thus, PDA growth is higher overall for Santa Rosa than what local plans indicate. While we understand that place types are considered in the housing distribution, and downtown Santa Rosa is designated as a City Center, this may affect future housing unit growth assumptions unrealistically for a city center such as Santa Rosa's. Based on the public process to develop the specific plan for downtown and the existing and proposed development pattern, the plan illustrates the highest level of acceptable and feasible densities.

In terms of the overall housing units, the draft report (page 45) estimates Santa Rosa with 67,400 units in 2010. This appears to be a city limits estimate. Santa Rosa's general plan addresses the area within the urban growth boundary, similar to the sphere of influence; this area is estimated to contain about 71,000 units. Santa Rosa's general plan estimates an additional 23,770 units within its urban growth boundary, compared to 19,790 estimated in the chart.

Based on adopted plans and the in-process north station plan, about 47% of future growth in Santa Rosa's urban growth boundary is projected in PDAs. Based on the ABAG projections, about 80% of future growth in Santa Rosa would be in PDAs, not reflective of local policy.

Regarding employment projections, it appears that, like the housing projections, the 2010 estimate is based on the city limits. The number of jobs between 2010 and 2040 is very similar to that projected by Santa Rosa's general plan, but the starting points are different, with Santa Rosa's 97,980 estimate representing existing employment within the urban growth boundary.

Thank you for the opportunity to comment. If you have questions about these comments, please contact me.

Lisa

Lisa Kranz, AICP | Supervising Planner

Advance Planning and Public Policy | 100 Santa Rosa Avenue, Room 3 | Santa Rosa, CA 95404

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May 3, 2012

Ms. Dana Hoggatt Ayers
Planning Manager
City of Pittsburg
65 Civic Avenue
Pittsburg, CA 94565-3814

RE: Comments on Plan Bay Area

Dear Ms. Hoggatt Ayers:

Thank you for your correspondence dated April 19, 2012, to Athena Ullah concerning the Plan Bay Area Jobs-Housing Connection Scenario and Transportation Investment Strategy.

Your comments will be presented to ABAG and MTC board members. Since the inception of Plan Bay Area, we have received numerous letters such as yours with detailed and thoughtful comments. ABAG and MTC staffs will present recommendations on a Preferred Scenario at a joint MTC Planning and ABAG Administrative Committee meeting on May 11, 2012.

Both agencies will meet jointly again on May 17 to approve a final Preferred Scenario. This will provide the basis for a draft Sustainable Communities Strategy (SCS) which will undergo an environmental assessment through the remainder of the calendar year. The draft SCS will be released at the end of this year, with adoption of a final SCS slated for April 2013.

We appreciate your concerns and suggestions. The outcome of this major planning effort will be better thanks to your participation.

Sincerely,

A handwritten signature in black ink, appearing to read 'Doug Kimsey'.

Doug Kimsey
Planning Director
Metropolitan Transportation Commission

A handwritten signature in black ink, appearing to read 'Kenneth Kirkey'.

Kenneth Kirkey
Planning Director
Association of Bay Area Governments



City of Pittsburg
Development Services Department
Planning Department
65 Civic Avenue
Pittsburg, CA 94565-3814

April 19, 2012

Athena Ullah
Association of Bay Area Governments
101 Eighth Street
Oakland, CA 94607

Dear Ms. Ullah:

Thank you for this opportunity to review and provide comments on the Job-Housing Scenario for the Sustainable Communities Strategy (SCS). As we have written in previous correspondence, the City of Pittsburg (City) is and remains committed to the goals of smart growth as evidenced by the City Council's adoption of multiple Priority Development Areas (PDAs) within the City, including the Railroad Avenue eBART Specific Plan area, downtown Pittsburg, and the Pittsburg/Bay Point BART Station area in partnership with Contra Costa County.

The anticipated City-wide job growth under the SCS is within the City of Pittsburg General Plan's projected employment growth; however, the allocation of growth to each PDA respectively does not match the individual adopted PDA plans. Specifically, the SCS jobs projection for the Railroad Avenue Specific Plan area finds a total of 7,930 jobs by 2040 whereas the adopted plan assumes a total of 6,430 jobs. In the downtown PDA, the General Plan assumes development of approximately 3,500 jobs while the SCS job projection for the Downtown Pittsburg PDA assumes 2,520 jobs by 2040. Averaged across the two PDAs, the total jobs number is very close; however, without strategic transportation and infrastructure investments in the PDA areas as described below, realization of this job growth will not be possible.

As noted in the City's Initial Vision Scenario (IVS) letter, dated June 15, 2011, and in the City's SCS land use scenarios comment letter, dated January 27, 2012, the City believes that MTC and ABAG should be aware of and account for the following constraints facing the City in realizing the jobs and housing growth set forth in the SCS.

- 1) Overall, due to the global economic downturn and the State's dissolution of Redevelopment Agencies, the loss of major sources of public revenue for infrastructure improvements is and will continue to be a significant constraint.
- 2) There are significant infrastructure costs associated with higher intensity development envisioned for the PDAs. Infrastructure costs would be associated with upgrading and installing utilities; reconfiguring roadways to support pedestrian, bicycle and alternative modes of travel more efficiently; and, construction of BART replacement parking (particularly at the Pittsburg/Bay Point site). According to analysis prepared

for the Pittsburg/Bay Point BART Master Plan, BART replacement parking, which is essential to allow for development on the BART surface parking lot, is projected to cost approximately \$42 million (2010). While some funds may be captured through impact fees, infrastructure costs of this magnitude would likely make development of the site infeasible without significant public investment in new infrastructure.

- 3) Growth projected within the Railroad Avenue eBART Station area PDA can only realistically occur if an eBART Station is constructed at Railroad Avenue in Pittsburg. However, construction of a station stop at this intersection was not included in BART's eBART project budget. Further, the City can no longer rely on Redevelopment Agency funds to develop this Station. Without significant reallocation of funding from capital improvement and roadway projects to the development of a Station at the intersection of Railroad Avenue and State Route 4, the assumed residential and commercial development under the various SCS scenarios, and as permitted by the City's adopted Specific Plan, are unrealistic and cannot be achieved.

While these are significant constraints, they are by no means the only constraints facing the implementation of the development envisioned in the various land use scenarios. Specifically, there needs to be a greater commitment for funding increased bus frequency, expansion of bus routes, and other modes of transportation besides fixed rail, and the SCS and related transportation investment strategy must seriously consider funding and implementation of other Transportation Demand Management policies that will work along with land use and transit maintenance/expansion to achieve the goals set forth in Assembly Bill 32.

Thank you for the continued opportunity to comment on the Bay Area Sustainable Community Strategy.

Sincerely,


Dana Hoggatt Ayers
Planning Manager

cc. Joe Sbranti, City Manager
Garrett Evans, Assistant City Manager
City Council
Land Use Subcommittee
Sailaja Kurella, ABAG

Plan BayArea

May 4, 2012

Mr. Egon Terplan
Regional Planning Director
SPUR
654 Mission Street
San Francisco, CA 94105

RE: Comments on Plan Bay Area

Dear Egon:

Thank you for your correspondence dated April 19, 2012 to us concerning the Plan Bay Area Jobs-Housing Scenario and Transportation Investment Strategy.

Your letter included questions related to 5 separate recommendations. Our responses to your questions are as follows:

Recommendation I: Increase regional housing growth totals to include housing for all Bay Area workers and to support 110,000 additional jobs.

Questions:

1. How much of the region's true housing need is included in the 660,000 projected housing units?
2. Does this include housing for all income levels?
3. How many additional units are projected to be outside the region and house in-commuters?
4. Do we know where these in-commuters will live and the travel and GHG impacts of growth in those locations?
5. The Scenario states, "New housing must also be more affordable." How will this be possible if the region is not building sufficient housing for all the jobs it is creating?

Responses:

1. *An economic forecast of employment growth without consideration of constraints forms the upward boundary of potential growth. Local land use constraints are only one of the factors constraining the region's ability to produce more housing. Financing, market absorption, and funding for affordable housing are some of the other constraints on housing production that have*

been identified, particularly for multi-family housing which will increasingly become the dominant form of new construction in the Strategy. Given these constraints, staff considers construction of 660,000 units to be ambitious, but feasible. This level of growth is beyond the level of growth currently planned for by many jurisdictions. The employment growth in the Strategy corresponds to this level of production.

2. *This growth includes housing at all income levels, and housing all of the region's population.*
3. *The demographic forecasting produces calculations for jobs and employed residents in the region. The difference between the two has fluctuated widely over the last 30 years, and is a measure of both net in-commuting and multiple job holders. Given proposed housing and transportation strategies, we can assume lower growth of in-commuters than previous decades. Holding the ratio of jobs to employed residents constant at 2010 levels results in a 2040 difference between jobs and employed residents still far below 2000 levels.*
4. *Housing affordability is based on expected employment growth and a set of policies and investments to support retention and production of affordable housing (addressed in Section 4 of a report to be released by ABAG on May 11, 2012).*

Recommendations II: Clarify how the scenario achieves the 9 percent per capita reduction in greenhouse gases (GHG).

Question:

Why does the percent of "Above Moderate" income decline from 42% in 2010 to 39% in 2040? If the plan assumes an increasing share of knowledge sector jobs and a decline in middle income, it would be expected that the moderate income would decline faster while the higher income levels as a share would increase.

Response:

Your question conflates industry sectors with income levels. The revised report will speak to this issue more directly. Professional Services is the sector with the largest increase in jobs in the projection. Within this sector, more than half of the jobs are in occupations that are relatively low-wage (Office and Administrative Support, Maintenance, Transportation, Building Cleaning, Security, etc). Losing jobs in industries with good middle-income wages and replacing them with industries with fewer higher-paying jobs and more lower-paying jobs will result in fewer above moderate income households as a share.

Recommendation III: Clarify the land use allocation with a map, a better explanation of the methodology and the specific land use policies that achieve the growth pattern.

Questions:

1. Was there an analysis of capacity (zoning and other land use constraints) in the allocation of jobs and housing throughout the region?
2. Was there an analysis of market or economic feasibility in the allocation of housing and jobs throughout the region?
3. What are the assumptions for how much greenfield land will be developed under this scenario?

Mr. Egon Terplan
 May 4, 2012
 Page 3

4. The scenario states that it will accommodate "more than two thirds of housing production in Priority Development Areas." What analysis was done to determine the current capacity of PDAs and whether or not this figure is reliable? Was there any analysis done to determine if there is sufficient space (zoned plus soft sites) in PDAs to fit both the jobs and the housing?
5. How does this scenario compare with the prior scenarios developed over the past year as well as Projections 2009, 2007, 2005 and 2003? And as related questions, what figures should be understood as Projections 2011 and which ones will be Projections 2013?
6. Did staff distinguish between different types of PDAs in the allocation?
7. What data or information was used to determine current conditions in the places where growth is allocated?
8. What was the role of the UrbanSim model in the growth allocation?
9. How sensitive are the assumptions for employment location to issues of rising costs in the urban core? For example, how does the plan acknowledge the relationship between increasing employment density in the core and the lack of growth controls at the edges, which provides a cost-effective way to shift jobs out of the core?
10. Maps

Responses:

Housing:

The housing distribution starts with an assessment of current housing, households, housing vacancies and population for each area throughout the region (utilizing 2010 U. S. Census data). Housing development potential was used as the basis for distributing growth to 2040 to each area. The potential for housing development up to 2040 for each place was determined from existing and future land use and zoning capacity data and local growth potential information from the following three sources:

- 1. Local input on SCS scenarios: Local feedback on the SCS scenarios through letters, emails, meetings, and the SCS Basecamp forum, the PDA Assessment, and new applications for PDA designation provided detailed information on planned growth in specific PDAs and jurisdictions and growth constraints.*
- 2. PDA Place Types: Locally-selected place types by PDA served as a reference on the scale of growth proposed in each PDA.*
- 3. Land Use Capacity: ABAG collects existing and planned land use data from local jurisdictions. The land use database includes local zoning and general plan designations along with allowable densities and intensities for development. Housing development potential for each area within the region up to 2040 was determined via analysis of these local zoning and land use designations. (Please note that the land use database includes information from adopted general plans and zoning ordinances only, so the capacity reflected in the scenarios may reflect lower (or higher) capacity than what jurisdictions are currently planning.) This land use database is currently being utilized in the UrbanSim model, a software-based simulation urban development model incorporating land use, transportation, economic, and environmental factors developed by UC Berkeley, Purdue University, and ABAG for the Bay Area.*

Mr. Egon Terplan
May 4, 2012
Page 4

The housing distribution in the Draft JHC scenario places a limit on building at the urban fringe. This is meant to represent the effects of an ongoing regional urban limit line. Many of the region's cities and counties have such urban limit lines or utility district lines that serve such a purpose. Information on these development boundaries is used in this scenario to place particular parcels off limits for development.

The distribution takes into account PDA place types. In general more growth is steered towards PDAs planning for more intense development (regional centers, city centers, mixed use corridors, urban neighborhoods). The distribution methodology also utilizes a "housing value factor" to identify strong market areas throughout the region. This housing value factor was based on 2010 jurisdictional median home value from the U. S. Census.

Jobs:

National Establishment Time Series (NETS) data was used to determine the 2010 distribution of employment within each industry sector within each county. This data was also used to calculate growth since 1990, which was used in the Knowledge-Strength Index to allocate knowledge-sector employment growth. The Knowledge-Strength Index was developed to address relative strengths in attracting knowledge jobs to different jurisdictions, reflecting agglomeration economies, labor access, and relative scale of economic activity. PDAs were distinguished by their existing employment composition and by local plans for employment growth. Local jurisdictions identified future capacity in most PDAs. ABAG data on local general plans was used to fill in gaps in information provided.

Maps indicating the spatial distribution of regional job and housing growth and the various factors utilized to develop the growth distributions will be included in the May 11 Jobs Housing Connection Strategy report.

For more information on the housing and job distribution methodologies, please refer to Appendix 5 and 6 in the Draft Job-Housing Connection report, March 2011.

Recommendation IV: Close the GHG Gap through policies that reduce the demand for automobile use and help achieve focused growth.

GHG Reduction Policies

The proposed GHG policy measures are heavily focused on improving vehicle efficiency because they are the most effective GHG reduction strategies. We have posted technical information about each policy measure at: http://www.onebayarea.org/pdf/Appendices_5-4-12/Appendix_E_TechReport_CPI_050412.pdf

Approach 1: Reducing the demand for driving

Road Pricing

Because the Express Lane Network and its toll bridges are the region's freeway pricing strategy in Plan Bay Area, open road tolling is not considered to be implementable in the RTP time period.

VMT Tax

We had initially included a VMT tax in our initial target setting evaluation, but the proposal was not supported by MTC or ABAG.

Mr. Egon Terplan
May 4, 2012
Page 5

Parking policies

Neither MTC nor ABAG have the jurisdictional authority to impose parking pricing strategies. We do, however, propose to require local agencies to consider parking policies as part of the PDA Planning Grant program.

Approach 2: Encouraging more concentrated land development

Indirect Source Rule

The BAAQMD has the legal authority to implement an indirect source rule (ISR) in this region. Their staff has expressed interest in working with the other regional agencies and local jurisdictions to further explore this option.

Change MTC's transit expansion policy

Staff is considering how employment and commercial density might be included in MTC's TOD Policy.

Investment if Transit Priority Projects

By definition, TPPs include a high number of units per acre. As you know, the local element of OBAG distributes funds back to counties based on housing produced and planned. Counties with high numbers of TPPs would likely get larger shares of OBAG funding; we are proposing that the CMAs be given the responsibility for distributing OBAG funds within their respective counties.

Tax policy/sharing

Neither ABAG nor MTC are considering Proposition 13 reform in their legislative agendas.

Recommendation V: Incorporate Consistent support for focused growth and high-performing transit projects in other transportation investment strategies.

We appreciate your thoughtful comments on the One Bay Area Grant proposal. Final OBAG guidelines will be reviewed by MTC and ABAG this month. We would encourage you to attend these meetings and let your agency's views be known.

BART Metro included at \$ level of ACTC Expenditure Plan; We await BART's further definition of this program per their request.

We hope that these responses address your questions. Please do not hesitate to contact one of us if you have further comments or questions.

Sincerely,



Doug Kimsey
Planning Director
Metropolitan Transportation Commission



Kenneth Kirkey
Planning Director
Association of Bay Area Governments



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Debra Walker

Cynthia Wilusz-Lovell
Cindy Wu

April 19, 2012

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Dear Steve Heminger and Ezra Rapoport:

We commend MTC and ABAG staff on the difficult work of putting together the Bay Area's first Sustainable Communities Strategy (SCS). In addition to the challenge of incorporating a major new land use focus into the Regional Transportation Plan, it is even more difficult to do so with no new staff resources and in a post-Redevelopment era with fewer tools to achieve focused growth.

SPUR has reviewed the Jobs-Housing Connection Scenario, dated March 9, 2012, and the Draft Plan Bay Area Investment Strategy, dated April 6, 2012, and we offer the following comments and recommendations on both those documents.

We support many of the ideas contained in these documents. We support the concept of focusing growth into priority development areas (PDAs), particularly where there is local support. This regional/local collaboration has been a hallmark of the success of the Focus program. We recognize that not all PDAs are equal in terms of market conditions and transit capacity. But the basic idea of using regional criteria to establish a PDA and committing a share of regional resources to support PDAs is worth continuing.

We applaud ABAG for noting the relationship between additional housing production and job growth and for arguing that the region's job base would grow further with additional housing. We are encouraged that ABAG has highlighted the long-standing challenge of job decentralization.¹ As SPUR argues in our recent report *The Urban Future of Work* increasing employment (and residential) densities is important for strengthening economic competitiveness as well as achieving environmental goals.²

Finally, we commend MTC staff on its project performance assessment and the call for increasing funding for maintenance ("Fix It First").

However, we are concerned that the draft Jobs-Housing Connection Scenario and draft Plan Bay Area Transportation Investment Strategy do not meet the spirit or perhaps even the letter of SB 375 in their implementation of the two key goals of the legislation:

- Housing the region's *entire* population at all income levels, and

¹ According to the memo MTC commissioned from the Center for Transit Oriented Development, since 1990, the total number of jobs in PDAs/GOAs has declined by 100,000, a percent decline from more than 52 percent to below 48 percent of total regional employment. See: "Historic and Projected Employment Trends in the Bay Area" dated March 19, 2012.

² See: http://www.spur.org/files/event-attachments/SPUR_The_Urban_Future_of_Work.pdf

- Reducing per capita greenhouse gas emissions by 15% per capita in 2035 primarily through changing land use patterns.

This letter has five separate recommendations, offered in the spirit of supporting the best possible and most transparent Sustainable Communities Strategy and Regional Transportation Plan for the Bay Area:

- I. Increase regional housing growth totals to include housing for all Bay Area workers and to support 110,000 additional jobs.
- II. Clarify how the scenario achieves the 9 percent per capita reduction in greenhouse gases (GHG).
- III. Clarify the land use allocation with a map, a better explanation of the methodology and the specific land use policies that achieve the growth pattern.
- IV. Close the GHG gap through policies that reduce the demand for automobile use and help achieve focused land use patterns.
- V. Incorporate consistent support for focused growth and high-performing transit projects in other transportation investment strategies.

I. Increase regional housing growth totals to include housing for all Bay Area workers and to support 110,000 additional jobs.

The draft Jobs-Housing strategy claims to house the entire region while at the same time arguing that in commuting will necessarily increase.³ It does so by arguing that the Bay Area has constraints on its ability to sufficiently build housing. It even notes that the total number of regional jobs would be 110,000 higher with additional housing production.

We are very aware of the difficulties of building housing and the reality that some workers will still choose less expensive housing outside of the nine-county region even if their jobs are in the Bay Area. But that reality should not be an argument for the region to assume a lower housing or employment figure. It is the very purpose of regional planning and the intent of SB 375 and its Sustainable Communities Strategy to identify the true housing need of each region and the constraints that must be overcome in order to meet that need.

Failure to plan for the Bay Area's full housing gives the appearance of a self-reinforcing argument that the region cannot add sufficient housing because local governments place constraints on housing production. This argument in effect says, our job growth is constrained by the limited amount of housing local governments are willing to build. That means we will then not ask local governments to plan for sufficient housing (because we are assuming fewer jobs). In the end, this means even less housing is actually approved and built, and the region becomes that much more unaffordable and slower growing.

Our interpretation of SB 375 is that "all the population of the region" means that we must *plan for housing for all the people with jobs in the region* and not assume some of those people will be housed outside of the region.⁴ We make this argument in our memo from June 2011.⁵ Our interpretation would likely mean an increase in the total housing figures.

³ The Jobs-Housing Connection Scenario states that 660,000 housing units "will allow the region to house all its population in 2040." Yet the scenario also notes that the "rate of net in commuting will remain at 2010 levels," which "implies a small increase in in commuting proportionate to the increase in total jobs in the region". See: Jobs-Housing Connection. p.9 and 62.

⁴ The specific language of SB 375 states that the SCS shall "identify areas within the region sufficient to house all the population of the region, including all economic segments of the population, over the course of the planning period of the regional transportation plan taking into account

The current scenario appears to interpret SB 375 to say that we do *not* need to plan for all the housing for people who work in the Bay Area so long as the overall *percent* of in commuting does not go up. For example, if total Bay Area jobs increase from 3.4 to 4.5 million, ABAG assumes that the actual number of people with Bay Area jobs who live outside of the region will increase, even if the percent of people who in commute stays the same.

It is a legal debate as to whether or not this assumption violates the letter of the law. But we think it clearly violates the spirit of SB 375. SB 375 expects each region to identify housing for all new jobs in that region and not assume these people will be housed in other regions.

In addition, SPUR differs with the scenario's argument that "total job growth is constrained by our ability to produce housing." We recognize that the inability to produce housing will constrain job growth, and we commend staff for noting this relationship.⁶ However, if more housing production would increase job growth, the plan must identify both the needed increment of housing and the additional job growth that would be associated with meeting all housing needs.

The scenario does not make clear why the region is constrained in its ability to produce housing or which policies or tools might allow us to vary from past trends.

Our constraints in the Bay Area are primarily political, not economic or spatial. The ability to produce sufficient housing is constrained by local governments' unwillingness to zone and approve housing. We have lots of room for infill development – in all areas of the region.

The following are our questions about the overall growth figures, which we encourage regional agency staff to answer or clarify in the final RTP/SCS document:

- How much of the region's true housing need is included in the 660,000 projected housing units?
- Does this include housing for all income levels?
- How many additional units outside the region are projected to house in commuters?
- Do we know where these in commuters will live and the travel and GHG impacts of growth in those locations?
- The scenario states, "New housing must also be more affordable."⁷ How will this be possible if the region is not building sufficient housing for all the jobs it is creating?

II. Clarify how the scenario achieves the 9 percent per capita reduction in greenhouse gases (GHG).

The scenario is not clear about how it achieves the per capita GHG reduction and the relative role of land use changes, demographic assumptions (income, age, employment participation), pricing and transportation investments.

net migration into the region, population growth, household formation and employment growth". See: http://www.leginfo.ca.gov/pub/07-08/bill/sen/sb_0351-0400/sb_375_bill_20080930_chaptered.pdf

⁵ See: "Re: SPUR comments on Sustainable Communities Strategy/Regional Transportation Plan (SCS/RTP) scenarios". Available at: <http://www.spur.org/files/SPUR%20letter%20to%20MTC%206.21.11.pdf>

⁶ See: "According to Steve Levy, from the Center for Continuing Study of the California Economy, the region could capture another 110,000 jobs of the total national growth. However, the total job growth is constrained by our ability to produce housing, which is ambitiously estimated at 660,000 new units by 2040." p.8.

⁷ Jobs-Housing Connection Scenario p. 38

For greater clarity, we suggest that ABAG use the following table in the final version of the scenario to make clear how each component contributes to per capita GHG reductions:

	<i>Percent change in GHG per capita</i>
Demographic changes (age and labor force participation)	
Economic changes (income distribution)	
Employment changes (total jobs relative to prior Projections, types of industry)	
Land use (housing location)	
Land use (job location)	
<i>Subtotal GHG (currently 9%)⁸</i>	
Transportation investments	(currently 0%)
<i>Subtotal land use + demographics + economy + transportation</i>	
Pricing (gas, bridge tolls, transit fares)	
<i>Subtotal land use + demographics + economy + transportation + pricing</i>	
Additional policy changes	<i>Remaining gap (currently 6%)</i>
<i>Total per capita GHG reduction (15%)</i>	

Such a table would help answer the following questions

- How much of this 9% reduction comes from land use changes alone?
- How much of it comes from changes in other assumptions (such as age and income distribution)?
- What was the methodology to determine these differences?

In addition to these general questions, the following are specific questions about the key demographic assumptions.

- Why does the percent of “Above Moderate” income decline from 42% in 2010 to 39% in 2040? If the plan assumes an increasing share of knowledge sector jobs and a decline in middle income, it would be expected that the Moderate income would decline faster while the Above Moderate levels as a share would increase.
- What is the GHG implication of a decline in the Above Moderate income share from 42% to 39%?
- What are the assumptions of the employment and driving rates by age group? How are those determined?

⁸ This per capita reduction level is not noted in the draft scenario but was instead noted in staff presentations.

III. Clarify the land use allocation with a map, a better explanation of the methodology and the specific land use policies that achieve the growth pattern.

We do not think the scenario makes clear how it will achieve focused growth or even how focused the proposed land use pattern truly is. In particular, based on the information in the current Jobs-Housing Scenario, we are not clear about what specific land use changes are proposed in the scenario, nor what specific policies were analyzed to achieve the described land use distribution.

Additionally the scenario does not have a business as usual or base case to allow the reader to understand how the scenario varies from a standard land use pattern that would ordinarily occur in the absence of the SCS.

Part of this would be clearer with better maps. As a result, we strongly urge ABAG to include maps in the SCS that show specifically where growth is going. The maps of PDAs do not include information that allows one to assess the implications of the growth scenario or how the allocation differs from prior projections.

We also request that the final version of the PDAs include the specific sets of policies that were run through the model to achieve the land use pattern of the SCS. For example, the SCS should identify the relative densities in key places, as well as policy changes such as new tax policies or urban growth boundaries.

The following are additional questions or clarifications about the land use allocation process:

- Was there an analysis of capacity (zoning and other land use constraints) in the allocation of jobs and housing throughout the region?
- Was there an analysis of market or economic feasibility in the allocation of housing and jobs throughout the region?
- What are the assumptions for how much greenfield land will be developed under this scenario?
- The scenario states that it will accommodate “more than two thirds of housing production in Priority Development Areas.” What analysis was done to determine the current capacity of PDAs and whether or not this figure is reliable? Was there any analysis done to determine if there is sufficient space (zoned plus soft sites) in PDAs to fit both the jobs and the housing?
- How does this scenario compare with the prior scenarios developed over the past year as well as Projections 2009?
- As a related question, are the figures in this Scenario “Projections 2011” or are they “Projections 2013” or has the SCS process replaced ABAG’s long-standing Projections product?
- How did staff distinguish between different types of PDAs in the allocation?
- What data or information was used to determine current conditions in the places where growth is allocated?
- What was the role of the Urban SIM model in the growth allocation?
- How sensitive are the assumptions for employment location to issues of rising costs in the urban core? For example, how does the plan acknowledge the relationship between increasing employment density in the core and the lack of growth controls at the edges, which provides a cost-effective way to shift jobs out of the core?

- Does the scenario rely on public investment in infrastructure and affordable housing in order to achieve the level of proposed infill development in the PDAs? If so, what are the implications of a post-redevelopment world on the viability of the growth allocations?

IV. Close the GHG gap through policies that reduce the demand for automobile use and help achieve focused growth.

The current SCS/RTP achieves a nine percent per capita reduction, six percent short of the 2035 goal. The policies included in the MTC strategy “Close the GHG gap” are too heavily focused on improving the efficiency of vehicles. While changing the speed limit could have significant impact on lowering per capita emissions, we think the spirit of SB 375 is really about changing future land use in a way that will reduce automobile dependency.

The following are our comments and questions about the specific proposals in MTC’s Transportation Investment Strategy #1: “Close the GHG Gap.”

We are skeptical of the need for regional investment in electric vehicle purchasing and infrastructure. There is increasing private sector investment and a growing private market. If MTC wishes to invest scarce public dollars in such systems or programs, these programs must be evaluated on the basis of cost per ton of CO₂ reduced. The investments and per capita GHG reductions from car sharing and vanpooling demonstrate how modest investments in those areas are much more cost effective.

We think MTC should eliminate the distinction between Option A and B and instead provide decision-makers with a list of policies and programs ranked by cost per ton of CO₂ reduced. See SPUR’s *Critical Cooling* paper from 2009 for a methodology of “least-cost planning.”⁹

We also think there is a need to provide some robust explanation of the assumptions behind the per capita emissions reductions for each of the proposed policies and programs. MTC should also clearly explain how these “climate policy initiatives” would not involve any double counting of emissions reductions that are already included in the AB 32 scoping plan.

Instead of this focus on vehicle efficiency, we think instead that the “Close the GHG gap” strategy should focus on reducing the demand for driving and encouraging more concentrated land development. Many of the following recommendations are made in SPUR’s report *The Urban Future of Work*.¹⁰

Approach 1: Reducing the demand for driving

Road pricing

SPUR reiterates our call for MTC to explore a plan of road pricing as part of the RTP/SCS.¹¹ By road pricing, we are referring to open lane tolling that has the triple benefit of helping achieve

⁹ SPUR. *Critical Cooling*. 2009. Available at: http://www.spur.org/publications/library/report/critical_cooling

¹⁰ See: http://www.spur.org/files/event-attachments/SPUR_The_Urban_Future_of_Work.pdf

¹¹ See: page 3 of <http://www.spur.org/files/SPUR%20letter%20to%20MTC%206.21.11.pdf>

the GHG goal, helping achieve the focused growth pattern, and raising revenue for both highway maintenance and transit operations.¹²

The freeway system is mostly 50 years old and at the end of its useful life and must be rebuilt. However, the main revenue source -- fuel taxes -- will almost certainly decrease at an exponential rate as fleet fuel mileage increases and electric vehicles proliferate. Tolls are the best regional funding solution. MTC should use this SCS/RTP process to educate the public and policymakers about the implications of this loss of fuel tax funding, as well as the overall need.

Specifically, we call for a pilot program of full-lane road tolls on I-80 between the Carquinez Bridge and the Bay Bridge. In addition, we propose exploring full lane road tolls on US-101 and I-280 from San Francisco to San Jose as part of a funding strategy for high-speed rail and other transit.

Vehicle Miles Traveled (VMT) tax

As proposed in the Southern California Association of Governments (SCAG) RTP/SCS, MTC should consider a 5 cent VMT tax that replaces the current state (and potentially federal) gas tax.¹³ Instead of assuming such a tax as part of the overall GHG reduction plan, MTC should put this concept into its state and federal legislative package.

Parking policies

The following are a sample of some of the parking policies that could be included within the RTP/SCS:

- Eliminate free parking at commuter rail stations such as BART and Caltrain station areas.
- Support state legislative changes to eliminate parking minimums and establish parking maximums in particular transit-served locations. Such policies (like AB 710) prevent jurisdictions from requiring more than 1 parking space per residential unit or per 1,000 square feet of retail space. Such policies should also apply to commercial development in transit areas.
- Pilot demand-based parking pricing in station areas and particularly commercial shopping districts.
- Encourage parking cash-out programs at employment centers whereby employers charge for parking but reimburse employees for taking alternative modes to work.

Approach 2: Encouraging more concentrated land development

Indirect Source Rule

MTC and ABAG should take a leadership role in working with BAAQMD to establish a region-wide indirect source rule (ISR). An ISR attempts to price the indirect emissions associated with development. The ISR is a tool to impose additional costs on auto-oriented development and to provide other tools (such as transit passes or shuttles) to change travel behavior.

Change MTC's transit expansion policy

¹² We are cognizant of some of the equity considerations of such proposals. Given this, the pilots must be able to demonstrate the ability to provide significant net revenue for parallel transit service. In addition, qualified households should receive a certain number of free tolls as a credit to Fasstrak accounts.

¹³ See "Mileage-Based User Fee": http://rtpscs.scag.ca.gov/Documents/2012/draft/2012dRTP_03_Financial.pdf

MTC should change its transit expansion policy to incorporate employment and commercial density as a consideration for transit expansion funds. Having employment near transit is a greater indicator of likelihood to commute via transit than having housing near transit.

Investment in Transit Priority Projects

MTC should provide additional financial incentives for transit priority projects that are consistent with SB 375. This would be in addition to the CEQA streamlining that is identified in SB 375. For example, MTC should commit a portion of its One Bay Area Grant program towards transit priority projects. This commitment is more specific than the current commitment towards PDAs. As a change to the provisions of SB 375, SPUR argues that the transit priority projects should consist not only of those that are greater than 50 percent residential, but also dense commercial projects that are in transit zones.

Tax policy

MTC and ABAG should advocate for specific changes to Proposition 13 that support the region's overall goals.

- This first idea would be to “split” commercial property taxes from the residential ones by allowing commercial taxes to increase at a faster rate or float to market while keeping homeowner rates unchanged. This approach could then have a transit overlay to allow for reinvestment in transit zones through tax cuts or credits. Such an approach would be akin to a new statewide redevelopment program financed by the growth in revenues from commercial property taxes.
- The second change would be to explore how homeowners could more easily transfer their Prop. 13-protected tax rates, in specific circumstances, across county lines. Many “empty nesters” remain in their homes even when other housing would be preferable simply because of the inability to transfer their old tax rates over county boundaries. Some counties have reciprocity but the lack of a statewide approach creates less of a financial incentive for people to move.

Tax sharing

ABAG and MTC should put into their legislative agenda a pilot project in the Bay Area to test sales or property based tax sharing at the regional or subregional level. SPUR is currently studying this concept.

V. Incorporate consistent support for focused growth and high-performing transit projects in other transportation investment strategies.

Finally, we wanted to offer the following brief comments on several of the other draft transportation investment strategies:

MTC Transportation Investment Strategy #3: Apply the OneBayArea Grant Framework

SPUR strongly supports the OneBayArea Grant (OBAG) proposal and framework. In particular, we think the program's success hinges on its ability to focus resources in areas that support the land use vision of the Bay Area. This means keeping 70 percent of the funds to support PDAs.

We encourage staff to refer to the goals of OBAG as rewarding jurisdictions that produce *both* housing *and* employment near transit. By excluding employment location from the goals of OBAG, staff misses an important opportunity to educate local policy and decision makers about the regional benefit of increasing the share of jobs near transit. There is significant evidence that putting jobs near transit is more likely to increase transit commuting than putting only housing

near transit.¹⁴ Given how the SCS identifies continued job sprawl and jobs shifting away from PDAs, increasing the region's share of jobs near transit must be a key priority.

We are concerned about the expansion of the PDA definition to include Rural Corridor and Employment Center place types. Expanding the PDA definition to include too broad a range of places undermines the very notion of focusing growth. There is clearly a need for better planning for job centers. A PDA definition for Employment Centers that does not include strict transit criteria is not the way to accomplish this.

MTC Investment Strategy #4: Fund High-Performers

SPUR supports the concept of funding the highest performing transportation projects. We agree with the New Starts ranking.

We encourage MTC to use a performance-based process to distribute the \$660 million Small/New Starts reserve pot of funds. We should spend such funds in a way that puts the greatest number of total riders onto transit.

We do want to note our strong support for the BART Metro project and program. Some of the ideas in BART Metro were highlighted in our 2009 paper.¹⁵ We recognize that although BART Metro scored highest among all regional projects, it is early in its development and is not a new expansion project per se. As a result, we encourage MTC to include BART metro within Strategy #5, given that it is in many ways an efficiency project that saves operating costs.

MTC Investment Strategy #5: Squeeze More Efficiency Out of Our Existing System

SPUR supports a robust regional program of demand management. We argued earlier in this letter for a regional road pricing policy and program. However, not all of what is included in strategy #5 is arguably demand management.

For example, of the Express Lane Network's 290 proposed miles of new HOT/HOV lanes, 120 of them are new lanes. This is a strategy to finance adding capacity, not to increase efficiency. We argue that the Express Lane Network should eliminate an approach that adds new highway lanes, particularly at the region's edges, given that such an approach will likely induce more travel and thus more greenhouse gas emissions. Instead, we support converting existing HOV lanes to HOT lanes and agree that such an approach is an "efficiency" strategy. However, we caution MTC to ensure that the sunk costs of these conversions do not preclude full lane pricing in the future.

We do not think that all aspects of the Freeway Performance Initiative (FPI) should be considered demand management. This is a significant program that should have a more explicit focus on transit and demand management strategies that directly align with the broader goals of the SCS/RTP. We call on MTC to better clarify what is included within the FPI and how it will be integrated with the Transit Performance Initiative (TPI).

There are many needs for studies and projects to better manage demand on the region's highways, including the Bay Bridge Corridor and congested areas along 101 linking San Francisco and San Jose.

¹⁴ See Kolko et al. "Making the Most of Transit: Density, Employment Growth, and Ridership around New Stations." http://www.ppic.org/content/pubs/report/r_2111kr.pdf

¹⁵ See: http://www.spur.org/files/event-attachments/SPUR_The_Future_of_Downtown_San_Francisco.pdf

Finally, Strategy #5 lacks a focus on securing greater efficiencies from the transit system. As a result, we encourage MTC to shift both BART metro and the Transit Performance Initiative into this strategy.

MTC Strategy #6: Make the Transit System Sustainable

SPUR was a big supporter and active participant in MTC's Transit Sustainability Project. We included nine specific recommendations to implement the TSP in our report titled, "A Better Future for Bay Area Transit."¹⁶ Few of those ideas are part of the proposed set of policies under Strategy #6.

We are very supportive of the concept of establishing a \$500 million Transit Performance Initiative. However, we think this concept might be more appropriately identified within Strategy #4.

We think this program is a great start and would like to see this "TPI" expanded in both size and scope. For example, we want to make sure that the TPI could fund both investments in small on-street improvements (such as signal priority) as well as larger capital investments such as BART Metro.

Finally, we recommend that MTC establish a transparent process to identify what types of projects are eligible for the Transit Performance Initiative.

In closing, we thank you for the opportunity to provide comments on the draft SCS/RTP. We look forward to your responses and ongoing collaboration.

Regards,

A handwritten signature in black ink, appearing to read "G2" followed by a long, sweeping horizontal stroke.

Egon Terplan
Regional Planning Director, SPUR

¹⁶ See: http://www.spur.org/files/event-attachments/SPUR_A_Better_Future_for_Bay_Area_Transit.pdf



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May 2, 2012

Mayor Jim Fraser
Town of Tiburon
1505 Tiburon Blvd.
Tiburon, CA 94920

RE: Comments on Plan Bay Area

Dear Mayor Fraser:

Thank you for your correspondence dated 4/19/2012 to Ken concerning the Plan Bay Area Jobs-Housing Scenario and Transportation Investment Strategy.

Your comments will be presented to ABAG and MTC board members. Since the inception of Plan Bay Area, we have received numerous letters such as yours with detailed and thoughtful comments. ABAG and MTC staffs will present recommendations on a Preferred Scenario at a joint MTC Planning and ABAG Administrative Committee meeting on May 11, 2012.

Both agencies will meet jointly again on May 17 to approve a final Preferred Scenario. This will provide the basis for a draft Sustainable Communities Strategy (SCS) which will undergo an environmental assessment through the remainder of the calendar year. The draft SCS will be released at the end of this year, with adoption of a final SCS slated for April 2013.

We appreciate your concerns and suggestions. The outcome of this major planning effort will be better thanks to your participation.

Sincerely,

A handwritten signature in black ink, appearing to read 'Doug Kimsey'.

Doug Kimsey
Planning Director
Metropolitan Transportation Commission

A handwritten signature in black ink, appearing to read 'Ken Kirkey'.

Kenneth Kirkey
Planning Director
Association of Bay Area Governments



April 19, 2012

Mr. Ken Kirkey, Planning Director
Association of Bay Area Governments
101 Eighth Street
Oakland, CA 94607

RE: Town of Tiburon's Comments on Draft Jobs-Housing Connection Scenario Document

Dear Mr. Kirkey:

Thank you for the opportunity to comment on the Draft Jobs-Housing Connection Scenario (DJHCS) document dated March 9, 2012.

The Town acknowledges the challenge of planning for population growth over the next 30 years while meeting the goals of reducing greenhouse gas (GHG) emissions to levels below that of current emissions. We further acknowledge that our town has a responsibility for a fair share of the regional growth necessary to meet the growing regional needs. We respectfully submit information that accounts for some of the particularized constraints that make the housing and job growth numbers projected in the DJHCS document unlikely and unrealistic in the Town of Tiburon.

Fewer Housing Units Needed than Projected in Tiburon

ABAG statistics show an increase of 131% in the population of seniors by 2040. Tiburon represents a larger proportion of this increase, and the seniors tend to be more affluent. They are more likely to live in the 54% of households that have more bedrooms than residents. Some will vacate these homes, making them available for new household occupants. Of the seniors who vacate their homes, some will move into existing group homes, others will move out of the area to be in assisted living facilities near family. The former will be part of the uncounted housing represented by those in group homes and their caretakers. Both the former and the latter will represent newly available housing units. Both groups of seniors reduce the need for new housing stock, more so especially in Tiburon than in most other communities.

Another uncounted group that reduces the need for new housing stock in Tiburon is those residents who house live-in help. As an affluent community, Tiburon has a disproportionate number of seniors and young families who are able to provide accommodations for live-in help. These arrangements should be considered in projecting housing unit needs for Tiburon.

Tiburon is a jurisdiction of less than 5 square miles of land and most remaining undeveloped land is on steep terrain subject to landslides, lacking infrastructure, and

Jim Fraser
Mayor

Emmett O'Donnell
Vice Mayor

Richard Collins
Councilmember

Frank Doyle
Councilmember

Alice Fredericks
Councilmember

Margaret A. Curran
Town Manager

otherwise severely physically constrained. The cost of developing these lands and the narrow roads from which transit corridors are not easily accessible on foot or by bike constrain building, reducing the likely feasible density of housing.

Constraints on Building the Required Density to Meet Growth Projections will Limit Growth

In order to meet the housing needs projected for the Town in multi use high-density projects, the Town foresees a proliferation of buildings of unprecedented height along Tiburon Blvd, the transit corridor. The Town of Tiburon has already zoned its commercial transit corridor to permit 3-story high density multi use development, with current pushback from the community on new two story buildings. Much of the developed land in Tiburon that is currently relatively affordable is located in areas subject to climate change-related sea level rise, according to the San Francisco Bay Conservation and Development Commission. Rezoning these areas for even denser development would be a travesty. They provide the moderate priced housing needed by younger families who are purposefully choosing Tiburon rather than a true urban setting in which to raise their children and/or age.

Local Economy Depends on the Character of the Town

The characteristics that make Tiburon different from other bayside tourist towns are the preservation of key aspects of a former railroad town. That identification is promoted and is a draw for tourists who help feed our local economy. While many buildings along Main Street and Ark Row in Tiburon have been renovated and refined, and there currently exist some two-story buildings along the range of Tiburon Boulevard frequented by visitors, the taller urban buildings that would be required to fulfill the draft job and housing projections will overwhelm the tourist visiting areas, resulting in an undesired "Potemkin Village" look. The identity of our former railroad town, with views of ridges and the bay and with in-scale buildings is one the town has cultivated and treasures. This identity attracts tourists and helps sustain local businesses. Their use of public transportation such as ferries makes the service viable for our residents as well. Tiburon's small resident population cannot support a downtown with local ferries, local services and stores in the absence of the tourist business. Loss of identity as a former railroad town will threaten the economic viability of our town and the ability of local business to serve local residents.

Limited Capacity for Meaningful Job Growth to Reduce Greenhouse Gas Emissions

The limited transit network in Marin County cannot provide transportation to jobs in Tiburon's downtown area, which is well off the main regional corridor of U.S. Highway 101, and is a destination where a sizable number of workers are restaurant workers who have shifts that do not coincide with very limited bus schedules. The



capacity to provide local housing for these workers, as explained above, is constrained. Historically Tiburon is one of the towns with a jobs/housing balance, but the people who live in town do not work in town, and, vice versa. If such job growth occurs, we believe that it will increase rather than reduce the vehicle miles traveled (VMT) to the Tiburon peninsula, as well as GHG emissions.

Alternatively, if the growth in the knowledge sectors means more residents will work in their homes, the reduction in VMT may be less than anticipated. If it is assumed that the businesses that contract with or hire knowledge-sector home workers will be off the Tiburon Peninsula, there is little evidence to predict either a decrease in VMT or a corresponding reduction in GHG. Additionally, any improvements toward improving public transit will be inordinately costly, as such improvements would be hampered by less frequent and less predictable use by home office occupants, and the organization of car and/or van pools will be less likely to meet the needs of these workers when they must travel to the offices of the companies that hire them or contract for their services. All these factors will limit the ability of knowledge sector job growth in Tiburon to reduce GHG emissions.

Finally, if it is foreseen that these knowledge-sector jobs will be located in local offices, again, the limited capacity to build such offices could threaten the local businesses that currently occupy our commercial spaces and serve the needs of our residents. Any reduction in the kinds of business that serve our local residents has potential to impair the balance of resident and tourist serving businesses that currently fuels a large portion of our small local economy.

Unrealistic Housing Production Projections

For Tiburon, the DJHCS projects 330 additional housing units and 460 additional households by 2040. The former number equates to an average of 11 new units constructed per year over the 2010-2040 timeframe. These projections are substantially higher than the 190 new households estimated for Tiburon by ABAG in its Projections 2009 document for the period 2010-2035. When compared with historical trends, the projections appear totally unrealistic. The following table provides Town-generated figures for the number of new housing units built over the past 16 years in the Town of Tiburon.

<u>Year</u>	<u># New Units Built</u>
1996	28
1997	34
1998	13
1999	18
2000	9
2001	13

2002	36
2003	3
2004	9
2005	3
2006	4
2007	2
2008	2
2009	4
2010	0
2011	0

178

Annual Average = 11 units

The growth in housing units that occurred from 1996 to 2002 is largely reflective of numerous subdivisions previously undeveloped land that were approved in the 1980's and 1990's and provided a sizeable inventory of vacant lots to be constructed upon. The Town's supply of such undeveloped lands and their realistic potential output in units is now very small; the supply of vacant lots upon which to build is greatly shrunken and will never again approach the volume available in the 1990's. It is unrealistic and unjustifiable to project that over the next 30 years the output of housing units built in Tiburon will match the average number constructed during the past 16 years.

Conclusion

Based upon the above facts and rationales, the Town of Tiburon respectfully requests that ABAG coordinate its job, housing unit and household projections in the DJHCS with the realities of our small town and the economy so dependent upon its character. To this end, we also request that a peer review by qualified experts be performed on the assumptions upon which the projections are based.

Sincerely,



Jim Fraser, Mayor
Town of Tiburon



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Association of
Bay Area Governments

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Oakland, CA 94607

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Phone: 510.464.7900
E-mail: info@abag.ca.gov

May 2, 2012

Mr. Albert Lopez
Planning Director
Alameda County
224 West Winton Avenue, Room 111
Hayward, CA 94544

RE: Comments on Plan Bay Area

Dear Mr. Lopez:

Thank you for your correspondence dated 4/20/2012 to Athena Ullah concerning the Plan Bay Area Jobs-Housing Scenario and Transportation Investment Strategy.

Your comments will be presented to ABAG and MTC board members. Since the inception of Plan Bay Area, we have received numerous letters such as yours with detailed and thoughtful comments. ABAG and MTC staffs will present recommendations on a Preferred Scenario at a joint MTC Planning and ABAG Administrative Committee meeting on May 11, 2012.

Both agencies will meet jointly again on May 17 to approve a final Preferred Scenario. This will provide the basis for a draft Sustainable Communities Strategy (SCS) which will undergo an environmental assessment through the remainder of the calendar year. The draft SCS will be released at the end of this year, with adoption of a final SCS slated for April 2013.

We appreciate your concerns and suggestions. The outcome of this major planning effort will be better thanks to your participation.

Sincerely,

A handwritten signature in black ink, appearing to read 'Doug Kimsey'.

Doug Kimsey
Planning Director
Metropolitan Transportation Commission

A handwritten signature in black ink, appearing to read 'Kenneth Kirkey'.

Kenneth Kirkey
Planning Director
Association of Bay Area Governments

MEMORANDUM

Date: April 20th, 2012

To: Athena Ullah, Alameda County Liaison- ABAG

From: Albert Lopez, Alameda County Planning Director

RE: **Feedback on Jobs-Housing Connection Scenario**

I'm writing in response to your request for input on the SCS process to date. As I have mentioned in earlier letters, our community members and elected officials have expressed their concern that the unincorporated area is being assigned growth in much the same manner as an incorporated city, even though the level of infrastructure investment, historically speaking, is much lower in unincorporated areas. There is consensus among many of our stakeholders that the unincorporated areas of Alameda County are in a "catch up" phase of improving existing conditions (new sidewalks, fire stations, and parks as well as improvements to police services, streetscape improvements etc).

We believe, simply due to the fact that we are an unincorporated area and not a city, we will be less successful in attracting development to the extent outlined in the SCS, especially outside our PDA areas. We have participated in the One Bay Area process wholeheartedly, and believe we should contribute to the regional growth goals, but it needs to be considered that unincorporated areas are not set up the same as incorporated cities in terms of infrastructure, public/civic improvement, a "core" or "downtown" identity and public perception. This is especially important on the jobs projections which follow the housing unit projections in our area with a 2.1 jobs per household ratio. While not by itself troubling, it seems unlikely for the reasons explained above that we would be able to deliver on the 13,070 jobs by 2040. From a land use perspective we have the appropriate general plan and zoning designations in place to accommodate this level of growth, but, again, it is not realistic for reasons already explained.

In case you are not aware, in 2000 the voters of Alameda County adopted Measure D, a slow/no growth measure that effectively placed most of the land outside the urban growth boundary (mostly in eastern Alameda County) off limits to new residential and commercial development, and had the effect of funneling all new development potential into the more urban, western portion of Alameda County (Castro Valley, Cherryland, Ashland, San Lorenzo, Fairview etc.). If not already, this should be taken into consideration when viewing our allocations.

Another concern is the lack of transit and the difficulty in overcoming the poor transit service in the unincorporated area. As an example, AC Transit is currently reviewing (an approval of the FEIR is pending) their Bus Rapid Transit (BRT) program for Alameda County which begins its route in Berkeley/Oakland and terminates in Downtown San Leandro, serving quite a few PDAs. The decision was made years ago to terminate the route in San Leandro, thereby missing a critical link which is the unincorporated area; establishing BRT through our area and connecting San Leandro to Hayward could

accomplish tremendous things in regards to the SCS goals. It would create an investment hub in a “chain of PDAs” concept stretching for 9 miles, and lay the foundation for a series of complete communities for Northern Alameda County. We are not getting the BRT however, and even if future phases include the unincorporated area, it will be decades before it materializes.

Lastly, the unincorporated portions of Alameda County are some of the most dense neighborhoods in the Bay Area, and many residents are weary of additional infill development that will increase the need for additional municipal services. To expect these neighborhoods to take on more development pressure, especially housing, given the level of infrastructure is inappropriate and, some might say, unfair. As we’ve outlined in our PDA applications, our commercial corridors (like many cities) are the most viable places for infill development to the scale envisioned by the SCS, and we have done our part in identifying those place-types we believe are feasible – but infrastructure dollars must be made available.

In addition, the loss of Redevelopment will increase the challenges to do infill in our area (much like other part of California), so it’s important to take the long view in regards to attracting infill development and finding funding mechanisms to put in needed infrastructure.

To sum it all up succinctly, we believe our PDA’s remain our best bet for transforming our communities into ones that are more transit rich and less dependent on the automobile, and based on our experience existing neighborhoods are unable or unwilling to become more dense in face of infrastructure shortages. Unincorporated areas are at a disadvantage in overcoming this shortage, and development scenarios as well as funding programs should recognize this shortcoming when considering allocating growth as well as capital dollars.

Thank you for allowing the County the chance to provide input, we look forward to future planning activities.



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#29

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May 3, 2012

Vice Mayor Sandy Donnell
City of Belvedere
450 San Rafael Avenue
Belvedere, CA 94920-2336

RE: Comments on Plan Bay Area

Dear Vice Mayor Donnell:

Thank you for your correspondence dated April 20, 2012, to Ezra Rapport concerning the Plan Bay Area Jobs-Housing Connection Scenario and Transportation Investment Strategy.

Your comments will be presented to ABAG and MTC board members. Since the inception of Plan Bay Area, we have received numerous letters such as yours with detailed and thoughtful comments. ABAG and MTC staffs will present recommendations on a Preferred Scenario at a joint MTC Planning and ABAG Administrative Committee meeting on May 11, 2012.

Both agencies will meet jointly again on May 17 to approve a final Preferred Scenario. This will provide the basis for a draft Sustainable Communities Strategy (SCS) which will undergo an environmental assessment through the remainder of the calendar year. The draft SCS will be released at the end of this year, with adoption of a final SCS slated for April 2013.

We appreciate your concerns and suggestions. The outcome of this major planning effort will be better thanks to your participation.

Sincerely,

Doug Kimsey
Planning Director
Metropolitan Transportation Commission

Kenneth Kirkey
Planning Director
Association of Bay Area Governments



CITY of BELVEDERE

450 San Rafael Ave. • Belvedere, CA 94920-2336
Tel: 415/435-3838 • Fax: 415/435-0430

April 20, 2012

Ezra Rapport
Executive Director
Association of Bay Area Governments
P.O. Box 2050
Oakland, CA 94604-2050

Subject: Bay Area Sustainable Communities Strategy (SCS); Review and Comments on Draft Preferred "Jobs-Housing Connection" Scenario

Dear Mr. Rapport;

Thank you for the opportunity to comment on the Draft Preferred Jobs Housing Connection Scenario (Draft Preferred Scenario) prepared for the One Bay Area Plan.

Background

The City of Belvedere has the smallest geographical area in the nine-county Bay Area region and the second smallest population (2,057 people). The City was incorporated in 1896 and, at this time, 98% of the land within the City's limits has been developed. City of Belvedere staff members are beginning to plan for the next Housing Element update and compliance with State of California-mandated housing policies, called the Regional Housing Need Allocation (RHNA).

This year the RHNA process will be combined with transportation planning pursuant to SB 375, a California law that aims to reduce greenhouse gas emissions from the transportation sector via land use planning. City of Belvedere staff has watched the development of the Sustainable Communities Strategy (SCS) developed for Marin County by ABAG and the Metropolitan Transportation Commission with interest because of the Community's commitment to the reduction of greenhouse gas emission and thoughtful land use planning.

The estimates in the SCS are called the "preferred scenario" because if the estimates in the scenario are realized they would reduce greenhouse gas emissions related to commuting by reducing growth projected in outer counties and suburbs. Instead, growth would be concentrated in existing, densely-developed core areas of San Francisco, Oakland, and San Jose. These core areas are close to employment centers and transit.

In the methodology used to develop the SCS Draft Preferred Scenario, Marin County as a whole receives only 17% of the job growth and 11% of the population growth expected over the next 30 years for the entire nine-county ABAG region. According to the Transit Authority of Marin, the basis for these projections is the 2007 State of California Department of Finance population and job growth projections for Marin County, as a whole.

ABAG / MTC SCS Response

April 20, 2012

Page 2

The SCS Draft Preferred Scenario methodology uses a 15-step process to break down the county-level growth projections to the level of projections for the individual cities and towns within Marin. At the conclusion of the 15-step process, the Draft Preferred Scenario assumes that the City of Belvedere should expect 90 new households and 70 new jobs over the next 30 years (ending in 2040).

Comments

The SCS methodology does not result in feasible or reasonable growth projections for the City of Belvedere for the reasons below.

The current Belvedere Housing Element, certified by the State of California Department of Housing and Community Development, projects 45 new households to year 2035 and 30 new jobs to year 2035. The City's actual historical rate of development of new housing, shown in the table below, is closer to the General Plan's projections of 1.8 households per year.

During the period of 1999 to 2011, development in Belvedere produced 29 housing units, or 2.2 units per year. Compared to this historical rate, the SCS Draft Preferred Scenario assumes a rate of development of 3 units per year. The historical rate of development over the last 11 years is outlined in the table below.

New Housing Units in the City of Belvedere

1999: 0

2000: 3

2001: 3

2002: 5

2003: 0

2004: 1

2005: 0

2006: 0

2007: 2*

2008: 2*

2009: 3*

2010: 4*

2011: 5*

TOTAL: 28 (2.2 per year, average)

Source: California Department of Finance

* City of Belvedere Planning Department

Annual Report to HCD

The conclusions of the SCS Draft Preferred Scenario methodology result in 90 new households and 70 additional jobs in Belvedere over the next 30 years. These conclusions are not supported by actual development trends and would not be feasible considering the geographical limitations of the

ABAG / MTC SCS Response

April 20, 2012

Page 3

Community, which is surrounded by water on three sides and subject to hazards such as flooding, landslides, and liquefaction. Lastly, the actual growth will slow as compared to historical growth because historical growth occurred when there was undeveloped land and, as the City moves closer to 2040, undeveloped land will be unavailable within the City limits.

The RHNA process will use the SCS as the basis for developing the fair share of the housing expected from local jurisdictions like Belvedere. Currently, the draft RHNA has indicated that Belvedere will be expected to provide opportunities for the development of 20 to 23 housing units in the next Housing Element cycle (2014 to 2022). This is likely to require the City to provide opportunities for 15 to 17 high-density housing units, such as apartments. There is no undeveloped or underdeveloped land available to receive even 10 high-density apartment units.

The Draft Preferred Scenario methodology results in 70 new jobs in Belvedere by 2040. The Belvedere General Plan projects only 30 new jobs to year 2035. These Draft Preferred Scenario job projections are not supported by the types of employers in Belvedere or the land available for commercial development. Businesses located in Belvedere include two private clubs and marinas, one restaurant, one bank, one drycleaner, offices for one construction firm, an architect, a real estate and property management firm, a nursery school, and a retail plant nursery. None of these employers have approved or pending applications to expand their businesses or facilities. Belvedere's commercially-zoned land consists of a parcel shared with the Town of Tiburon and mapped within Tiburon's Sphere of Influence, further reducing the potential for commercial development.

The SCS Draft Preferred Scenario would reduce greenhouse gas emissions for the Bay Area by 9%. The Belvedere City Council has set a goal to reduce greenhouse gas emissions by 15% by 2020. The City participates in the Marin Energy Authority (MEA) and purchases 100% renewable energy for City facilities. In addition, City residents and the City's water service provider have also opted to participate in the MEA, greatly reducing the greenhouse gas emissions related to private residences. The Belvedere Community is aware of its responsibility and has acted to address greenhouse gas emissions when compelled by feasible and effective planning. The current SCS Draft Preferred Scenario is not reasonable or feasible under the current methodology.

Conclusion

The City has had success in encouraging the development of small apartments within single-family residences, and the Belvedere Community has embraced this approach as a means to add to the range of housing types. The Belvedere Community has accomplished significant progress in implementing the General Plan and can continue to build on these successes into the future. The methodology in the SCS Draft Preferred Scenario does not fit unusually small communities like Belvedere, resulting in infeasible and burdensome housing requirements.

Sincerely,



Sandy Donnell, Vice Mayor

CC: City of Belvedere City Council



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May 3, 2012

Vice Mayor Diane Furst
Town of Corte Madera
300 Tamalpais Drive
Corte Madera, CA 94925-1418

RE: Comments on Plan Bay Area

Dear Vice Mayor Furst:

Thank you for your correspondence dated April 20, 2012, to Ezra Rapport concerning the Plan Bay Area Jobs-Housing Connection Scenario and Transportation Investment Strategy.

Your comments will be presented to ABAG and MTC board members. Since the inception of Plan Bay Area, we have received numerous letters such as yours with detailed and thoughtful comments. ABAG and MTC staffs will present recommendations on a Preferred Scenario at a joint MTC Planning and ABAG Administrative Committee meeting on May 11, 2012.

Both agencies will meet jointly again on May 17 to approve a final Preferred Scenario. This will provide the basis for a draft Sustainable Communities Strategy (SCS) which will undergo an environmental assessment through the remainder of the calendar year. The draft SCS will be released at the end of this year, with adoption of a final SCS slated for April 2013.

We appreciate your concerns and suggestions. The outcome of this major planning effort will be better thanks to your participation.

Sincerely,

A handwritten signature in black ink, appearing to read 'Doug Kimsey'.

Doug Kimsey
Planning Director
Metropolitan Transportation Commission

A handwritten signature in black ink, appearing to read 'Kenneth Kirkey'.

Kenneth Kirkey
Planning Director
Association of Bay Area Governments

#30



THE TOWN OF
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MARIN COUNTY CALIFORNIA

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TOWN CLERK
415-927-5086

FINANCE / BUS. LICENSE
415-927-5055

FIRE DEPARTMENT
415-927-5077

PLANNING / ZONING
415-927-5064

BUILDING INSPECTOR
415-927-5062

TOWN ENGINEER
PUBLIC WORKS
415-927-5057

RECREATION DEPARTMENT
415-927-5071

SANITARY DISTRICT NO. 2
415-927-5057

TWIN CITIES POLICE AUTHORITY
415-927-5150

April 20, 2012

Erza Rapport, Executive Director
Association of Bay Area Governments
101 Eight Street
Oakland, CA 94607

Dear Mr. Rapport,

This letter is to provide ABAG with feedback from the Town of Corte Madera on the Sustainable Communities Strategy Jobs-Housing Connection Scenario, also known as the Preferred Scenario.

While the Town of Corte Madera appreciate that ABAG has apparently taken some of our previous concerns into consideration in this round, we nonetheless have concerns regarding four aspects of the Jobs-Connection Scenario: the jobs numbers are too high, the rationale behind recent adjustments to our housing numbers is unclear, the relationship between SCS and RHNA has not been clarified, and we would like to request further public input into this process.

1. The recent Jobs-Housing Connection Scenario allocates 440 jobs to Corte Madera. We believe this number is too high and cannot be met. Our town's commercial area is dominated by two shopping centers, plus a modest amount of light industrial. We do not have any room for new commercial development at this time, so any new commercial space will have to be created from infill opportunities. Additionally, our commercially zoned property is in or near the Flood Plain which adds further costs and complications to new development projects. It seems at cross purposes to encourage and facilitate large scale commercial development to meet SCS Jobs Projections in these areas which are identified in BCD/USGS reports as "vulnerable in the future to sea level rise". It should also be noted that our recent rezoning of a former factory site to high-density housing was undertaken precisely to accommodate our 2007-2014 RHNA allocation. As a result, that site, where more than 100 people used to work, will no longer be available to help foster the jobs growth that is predicted by your analysis.

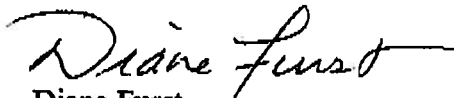
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Mr. Rapport
April 20, 2012
Page 2

2. The Town of Corte Madera notes that the housing numbers are more realistic in this round of planning, but we do not understand the basis of the apparent shift of some of our previous housing allocation onto other Marin jurisdictions. It appears that the numbers for Marin County remained the same, and while our numbers were reduced, many other towns increased. This implies that there is a number set aside for Marin, rather than taking into account true local planning constraints.
3. We are unclear on the precise relationship between SCS and RHNA. While we are in possession of the recently released RHNA methodology, we would appreciate clarification on the relationship between the two. In other words, are the SCS numbers going to determine the RHNA numbers for the next two rounds of RHNA?
4. We request that ABAG and MTC plan for additional public input. The prior round was disrupted by outspoken advocates and lacked substantial discussion of growth projections. We respectfully ask that this next round of public input be conducted in such a way that actual plans are discussed, complete with growth projection numbers.

Thank you for your consideration on these matters. As always, the Town of Corte Madera would be glad to assist your team in providing additional information should they need it.

Sincerely,



Diane Furst
Vice Mayor
Town of Corte Madera



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May 3, 2012

Ms. Kelly Diekmann
Senior Planner
City of Fremont
P.O. Box 5006
Fremont, CA 94537-5006

RE: Comments on Plan Bay Area

Dear Ms. Diekmann:

Thank you for your correspondence to our agencies concerning the Plan Bay Area Jobs-Housing Connection Scenario and Transportation Investment Strategy. (The letter, received on or about April 20, 2012, was erroneously dated May 27, 2011.)

Your comments will be presented to ABAG and MTC board members. Since the inception of Plan Bay Area, we have received numerous letters such as yours with detailed and thoughtful comments. ABAG and MTC staffs will present recommendations on a Preferred Scenario at a joint MTC Planning and ABAG Administrative Committee meeting on May 11, 2012.

Both agencies will meet jointly again on May 17 to approve a final Preferred Scenario. This will provide the basis for a draft Sustainable Communities Strategy (SCS) which will undergo an environmental assessment through the remainder of the calendar year. The draft SCS will be released at the end of this year, with adoption of a final SCS slated for April 2013.

We appreciate your concerns and suggestions. The outcome of this major planning effort will be better thanks to your participation.

Sincerely,

Doug Kimsey
Planning Director
Metropolitan Transportation Commission

Kenneth Kirkey
Planning Director
Association of Bay Area Governments



Community Development

39550 Liberty Street, P.O. Box 5006, Fremont, CA 94537-5006
www.fremont.gov

~~May 27, 2011~~ April 20, 2012

Ezra Rapport
Executive Director
Association of Bay Area Governments

Steve Heminger
Executive Director
Metropolitan Transportation Commission

101 Eighth Street
Oakland CA 94607

RE: One Bay Area Sustainable Communities Strategy Draft Preferred Scenario

Dear Mr. Rapport and Mr. Heminger:

I am writing to convey the City of Fremont response to the recently released Jobs-Housing Connection scenario. The City has been responsive and involved in the SCS process since the original Initial Vision Scenario was released in the spring of 2011 through the December 2011 updates of Priority Development Areas. The City has also been participating with the Alameda County Transportation Commission (ACTC) and the Alameda County Planning Directors on a comprehensive Alameda County approach to SCS planning in parallel to the regional One Bay Area planning effort. Overall we are supportive of the planning efforts as City's General Plan vision is consistent with the optimistic and ambitious growth totals for 2035. We also want to acknowledge there is additional work underway as part of the SCS and One Bay Area Plan to identify and support the public facility and transportation network improvements needed for the projected growth, which we recognize as vital to implementing the overall plan. The City does have two primary concerns pertaining to the current scenario for land use. The first is the jobs allocation methodology and the second is RTAZ allocations at the local level.

Job Allocations

The approach to projecting job growth allocations appears reasonable in addressing the City's understanding of economic development trends related to clustering, workforce, and accessibility as they relate to the Bay Area and Silicon Valley. However, we are concerned that the Knowledge Job component does not address new opportunity areas well in its methodology of allocating new jobs. This is evident for the City's Warm Springs Priority Development Area and its existing Ardenwood Business Park along SR 84 near the Dumbarton Toll Plaza. The Warm Springs PDA has over 200 acres of vacant developable land that will be served by new the



BART station and extension of BART to San Jose that then allows for both north and south access to the employment area surrounding the station. Because of these significant changes to the area it will have a different job make up and job attraction than past industrial development trends and result in more job growth and specifically to likely Knowledge Job types that work well in a PDA. Recent economic studies suggest growth opportunities of 10,000 to 25,000 additional jobs in the Warm Springs area, where as this scenario includes only growth of 7,000 jobs through 2040. The City requests using the "Plan Category" modifier of the scenario to add additional jobs to the Warm Springs PDA for a minimum growth total of 15,000 jobs.

In regards to Ardenwood, we indicated in December that it is not eligible to be a PDA but to ignore its developable land area in close proximity to the Peninsula across the Dumbarton Bridge is not realistic. The scenario only includes an increase of 500 jobs from current conditions where the capacity for the growth is likely in excess of 2,500-5,000 jobs at its highest level of use. It would be appropriate to recognize this potential for additional jobs when allocating jobs across Fremont.

RTAZ Allocations

When reviewing the jurisdictional totals and the PDA totals the City is generally satisfied with the approach taken in this scenario, with the exception of Warm Springs. When looking at the finer grain of the RTAZ allocations there are some substantial allocation discrepancies that need to be addressed. This includes the general approach of the modeling to assign some growth to almost all areas, even when it may be a fully built out hillside neighborhood.

Warm Springs PDA-RTAZ #748, 749, 750, 752: In this PDA station area and corridor, growth is misallocated out of the primary station area of the PDA represented by #752. Of the total growth for the PDA, a minimum of 2,000 to 2,500 units should be allocated to #752 in recognition of the available land and best transit access within the PDA. RTAZ #748 should have very little to no growth assumptions in it and #749 should also be reduced to only an increase of around 300 units. As mentioned previously we think the total jobs should be increase for the PDA overall and specifically they need to be allocated within #752.

Fremont City Center PDA-RTAZ #763, 777, 778: In this situation the growth will be better aligned with local plans when focused within #777 where a community plan directs both future housing and employment increases. Housing and job growth in #778 should be partially redirected to #777 with an additional 1,400 units and 1,500 jobs above the existing growth allocation. Additional jobs in #763 are probably overly optimistic and could be reduced by 1,000 jobs.

Irvington PDA- RTAZ #756, 762, 779: In this situation there should be minimal to no growth contemplated in #762 or #779 due to built out conditions. However, #756 should be increased substantially to reflect opportunity sites in this area. A minimum of a 500 unit increase would be viable in #756.

Centerville PDA- RTAZ #774, 775, 776, 784, 785- Units and jobs should be redirected from #776 to more core growth areas with 125 units additional units to each of #774, #775, #784, and #785. The job growth of #776 should be projected at only 200 jobs, some jobs can be redirected to



#774, but there is an over abundance of jobs projected for Centerville as it will not compete strongly for the similar job growth types against the nearby City Center PDA.

Other:

RTAZ #751: No housing is allowed or planned for this RTAZ, remove all existing and growth.

RTAZ #747: Built out hillside subdivisions, no additional growth and the 140 additional units should be removed.

RTAZ #769: As mentioned above, this business park will have job growth in the future. We recommend allocating growth at a minimum of 2,500 jobs to the RTAZ.

Conclusion

Thank you for the opportunity for additional input and refinement on the SCS draft preferred scenario. We are also working with ACTC on comments regarding the allocations and distribution of growth in Alameda County and support the overall approach of our companion work with ACTC. Our specific comments on the PDAs in this letter are the primary resource we will provide though on the issue of growth allocations. We continue to look forward to the continued work on RHNA allocation, transportation infrastructure, and public facility needs. If there are questions about these comments or needs for our data please do not hesitate to contact us.

Sincerely,



Kelly Diekmann, Senior Planner

Cc: Jeff Schwob, Community Development Director
Kristie Wheeler, Planning Manager
Beth Walukas, Deputy Director of Planning





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May 3, 2012

Ms. Elizabeth Cullinan
Director of Building and Planning
Town of Hillsborough
1600 Floribunda Avenue
Hillsborough, CA 94010-6418

RE: Comments on Plan Bay Area

Dear Ms. Cullinan:

Thank you for your correspondence dated April 20 and March 28, 2012, to Johnny Jaramillo concerning the Plan Bay Area Jobs-Housing Connection Scenario and Transportation Investment Strategy.

Your comments will be presented to ABAG and MTC board members. Since the inception of Plan Bay Area, we have received numerous letters such as yours with detailed and thoughtful comments. ABAG and MTC staffs will present recommendations on a Preferred Scenario at a joint MTC Planning and ABAG Administrative Committee meeting on May 11, 2012.

Both agencies will meet jointly again on May 17 to approve a final Preferred Scenario. This will provide the basis for a draft Sustainable Communities Strategy (SCS) which will undergo an environmental assessment through the remainder of the calendar year. The draft SCS will be released at the end of this year, with adoption of a final SCS slated for April 2013.

We appreciate your concerns and suggestions. The outcome of this major planning effort will be better thanks to your participation.

Sincerely,

A handwritten signature in black ink, appearing to read 'Doug Kimsey'.

Doug Kimsey
Planning Director
Metropolitan Transportation Commission

A handwritten signature in black ink, appearing to read 'Kenneth Kirkey'.

Kenneth Kirkey
Planning Director
Association of Bay Area Governments

TOWN OF HILLSBOROUGH

SAN MATEO COUNTY

Building & Planning Department

(650) 375-7422



1600 Floribunda Avenue

Hillsborough

April 20, 2012

Johnny Jaramillo
Regional Planner, ABAG
101 Eighth Street
Oakland, CA 94607

Dear Mr. Jaramillo:

Thank you for the opportunity to comment on the Draft Jobs-Housing Connection Scenario Report dated March 9, 2012. We truly appreciate the interactive nature of the Sustainable Communities Strategy (SCS) and Regional Housing Needs Allocation (RHNA) process.

We would like to commend the Report's acknowledgement of the need to protect "unique neighborhood character" and the strategy of directing new development "away from neighborhoods that are exclusively residential". As you likely know from previous correspondence, Hillsborough is an exclusively single family residential community.

The Report acknowledges the appropriateness of multifamily housing in most effectively providing housing for a range of incomes and household sizes, the need for future housing and jobs to be next to transit, amenities and services, the bayside of the Peninsula as being home to Fortune 500 headquarters, globally significant firms and research entities and charming Town centers, that economic clusters support job growth, and that downtown areas and transit-served neighborhoods are the primary focus for growth in San Mateo County. Since Hillsborough has neither multi-family nor commercial zoning districts (thereby not allowing businesses or Town centers within its jurisdictional boundaries) and is not adjacent to a major transportation center, the assumptions relating to jobs and housing growth in the Report would not be applicable to the Town in terms of neighborhood characteristics and potential growth opportunities. The bottom line is that *significant* housing growth in Hillsborough would not constitute "smart growth" since the essential components/assumptions acknowledged in the Report cannot exist within its boundaries.

April 20, 2012
Johnny Jaramillo
Regional Planner, ABAG
Page -2-

The attached letters indicate the Town's position on projections within previous iterations of the Initial Vision Scenario (IVS) and Draft SCS. Specifically, the existing number of jobs within the past and subject reports does not accurately reflect employment in Hillsborough. The 2009 Certified Hillsborough Housing Element documents only 607 regular full-time jobs in Hillsborough. All other jobs are either temporary or home based businesses, both of which are inappropriate to set housing needs for. The Report states that the regional growth pattern presented is representative of key input from local jurisdictions reflecting local character and aspirations. However, we believe that the subject Report does not yet reflect the Town of Hillsborough's input.

We are strong supporters of the integrative regional approach to address the jobs/housing issues, and believe we have successfully accomplished providing affordable housing in a sustainable way while maintaining the essential character of our neighborhood through our production of second units. However, the jobs and housing projections presented in the subject Report have the potential to affect the unique character of Hillsborough as a single family residential community over the long term.

We do understand that our community is particularly unique as there are only a handful of communities in the entire State of California that have no commercial businesses. We again welcome an opportunity for you to tour the Town as your schedule permits, understand our uniqueness and our constraints and meet with us to answer any questions you may have or discuss our comments further.

Sincerely,

A handwritten signature in dark ink, appearing to read "SR Cullinan".

Elizabeth S.R. Cullinan AICP
Director of Building and Planning
Town of Hillsborough



TOWN OF HILLSBOROUGH

1600 FLORIBUNDA AVENUE

HILLSBOROUGH

CALIFORNIA

94010-6418

March 28, 2012

Johnny Jaramillo
Regional Planner, ABAG
101 Eighth Street
Oakland, CA 94607

Dear Mr. Jaramillo:

Thank you for the opportunity to comment on the revised Sustainable Communities Strategies scenarios. The Hillsborough City Council reviewed the revised scenarios at their February 13, 2012 meeting.

We know that your office has received our May 18, 2011 letter regarding the Initial Vision Scenario (IVS). Additionally, we have had the pleasure of discussing the issue with you over the last several months. We would like to take this opportunity to confirm our continuing concerns regarding jobs and housing projections reflected in the revised Sustainable Communities Strategies scenarios.

While the revised scenarios include more conservative assumptions than the previous IVS scenario, the growth projections remain unrealistic for Hillsborough and have the potential to present a change to the Town's "essential character" as a unique single family residential community as follows:

- ❖ The revised scenarios represent more than double the growth of the last RHNA requirements annually and nearly ten times the overall allocation (*86 new units*).
- ❖ The Town's analysis for new housing opportunities concluded that there is opportunity in the town for 134 new primary housing units and 82 new second units between 2007-2014. (*This analysis is contained in the Town's 2009 Certified Housing Element and was based on a Town-wide site specific study including environmental and slope constraints*).
- ❖ 134 primary residential units (a finite number) plus 12 new second units over 30 years (360) would equal 494, a more realistic growth number for the Town of Hillsborough.

We believe that in order to allow meaningful consideration of alternatives that promote smart growth, ABAG should revise the proposed scenarios to:

- ✓ Refine the jobs numbers to reflect the number of regular jobs in Hillsborough so that housing needs can be determined in a more meaningful way;
- ✓ Revise the corresponding housing growth numbers;
- ✓ Eliminate consideration of any PDAs in Hillsborough; and
- ✓ Acknowledge the issue of ultimate build-out which does not change the essential character of the community.

In addition to commentary on the quantitative aspects of the revised scenarios, our City Council also considered policies and programs addressing the four specific goals of the SCS. Generally speaking, the Town continues to advocate the sub-regional approach to meeting housing and presents the following additional policies/programs as a few examples:

- ✓ RHNA credits for subregional and regional efforts (financial and time contributions to affordable housing programs);
- ✓ Sub-regional consolidation of emergency shelter facility requirements;
- ✓ School housing incentives.

We are strong supporters of the sub-regional approach and look forward to continuing to work with you on the Sustainable Communities Strategy. Additionally, we understand that our community is particularly unique as there are only a handful of communities in the entire State of California that have no commercial businesses whatsoever. We again welcome an opportunity for you to tour the Town as your schedule permits, understand our uniqueness and our constraints and meet with us to answer any questions you may have or discuss our comments further.

Sincerely,



Elizabeth S.R. Cullinan AICP
Director of Building and Planning
Town of Hillsborough

cc: Rich Napier, C/CAG
Paul Fassinger, ABAG



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May 2, 2012

Ms. Anne Cronin Moore
Interim Planning Director
City of Larkspur
400 Magnolia Avenue
Larkspur, CA 94939

RE: Comments on Plan Bay Area

Dear Ms. Cronin Moore:

Thank you for your correspondence dated 4/20/2012 to Ezra Rapport concerning the Plan Bay Area Jobs-Housing Scenario and Transportation Investment Strategy.

Your comments will be presented to ABAG and MTC board members. Since the inception of Plan Bay Area, we have received numerous letters such as yours with detailed and thoughtful comments. ABAG and MTC staffs will present recommendations on a Preferred Scenario at a joint MTC Planning and ABAG Administrative Committee meeting on May 11, 2012.

Both agencies will meet jointly again on May 17 to approve a final Preferred Scenario. This will provide the basis for a draft Sustainable Communities Strategy (SCS) which will undergo an environmental assessment through the remainder of the calendar year. The draft SCS will be released at the end of this year, with adoption of a final SCS slated for April 2013.

We appreciate your concerns and suggestions. The outcome of this major planning effort will be better thanks to your participation.

Sincerely,

Doug Kimsey
Planning Director
Metropolitan Transportation Commission

Kenneth Kirkey
Planning Director
Association of Bay Area Governments

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Customer Service

Fire 415 927-5007
Public Works 415 927-5017

Recreation 415 927-6746
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CITY OF LARKSPUR

April 20, 2012

Ezra Rapport
Executive Director
Association of Bay Area Governments
P.O. Box 2050
Oakland, CA 94604-2050

RE: Sustainable Communities Strategy – Comments on Draft Employment-Housing Connection Scenario

Dear Mr. Rapport:

The City of Larkspur appreciates the opportunity to comment on the Draft Preferred Scenario, also known as the Job-Housing Connection. Larkspur has remained active in the Bay Area Sustainable Communities Strategy (SCS) process for the last two years, responding to both the Initial Vision Growth Scenario and the various Alternative Scenarios presented late last year. Again, the City wants to acknowledge ABAG and MTC staff for their work on the Sustainable Communities Strategy and we continue to recognize it is a difficult task that has to be completed within an exceptionally short time period. We are pleased that the Draft Preferred Scenario prioritizes the protection of Marin's open spaces, environmental resources, and agricultural lands, while also recognizing the constrained transportation infrastructure of the County. Given these factors, it is appropriate that Marin be assigned a lower growth share than might have been assigned based on past 'fair share' growth projections for the nine-county Bay Area.

Although Larkspur supported the Initial Vision Scenario, we identified several objections to the increased housing and employment projections imposed under the Alternative Scenarios, as outlined in our letter of January 31, 2012. These objections were based on conflicts with the growth policies of our General Plan and Housing Element as well as the several realistic constraints to growth within Larkspur.

Principally, Larkspur is a largely built-out community with little undeveloped land and few areas that are viable for re-development. The SCS must take into account the constraints of building within ½ mile of the proposed Larkspur SMART Station location, given the extent of existing build-out and the limited amount of developable land area due to severe topography, bay water, Corte Madera Creek, and the physical imposition of the Highway 101/Greenbrae interchange. Although the currently proposed Highway 101/Greenbrae Interchange project would correct unsafe on- and off-ramps, it would have a negligible impact on capacity for travel in and out of the central portion of the community or to other areas of the region. The area within the larger proximity of the proposed SMART train station and the existing Ferry Terminal is built out with some, but very limited, potential for the development of additional housing and/or employment beyond what has been built and approved (but not built) for the area. The Larkspur SMART station, when built, will

be located at the end of the commuter line, away from employment centers in San Rafael and Santa Rose. Many commuters from Larkspur either drive or take the ferry to San Francisco and the projections for those taking the train north are minimal. There is currently no feeder bus service to the Larkspur Ferry Terminal.

We have reviewed the Draft Preferred Scenario and note that modifications have been made to the housing and employment projections, due to adjustments in the methodology of distribution outlined in the summary of the report (pages 67 and 70). The following are our comments on the Household and Job growth projections of the Draft Preferred Scenario:

Household and Housing Unit Projections for Larkspur

The Preferred Scenario anticipates an increase of 350 households and 140 units by 2040. Based upon the recognition of current housing vacancy data and constraints of local zoning and land use designations, the City finds the household projection of 350 Households to 2040 for Larkspur to be reasonable in terms of what is planned for Larkspur. We note that the proposed RHNA methodology appears to weigh much (94%) of this projected growth into the upcoming 2014-2022 cycle. These projections near the limit of our anticipated housing capacity growth of our current General Plan and Housing Element. Our Housing Element was based on aggressive and controversial effort to identify potential housing sites, given the physical constraints and the small-town character of the community. Further, as Census 2010 data shows a reduction of 234 households from 2000 to 2010, we question whether this extent of growth is realistic given these past growth pattern. Further, we remain concerned that further revisions of the Draft Scenario may result in continued re-distribution and/or revised methodologies that will significantly increase these projections to unrealistic proportions.

Larkspur is also concerned that the SCS, as it informs the State Department of Housing and Community Development's RHNA numbers, must emphasize the need to accommodate the aging demographic of Marin. ABAG's own statistics indicate a 131% increase in the 65+ population by 2040, and the California Department of Finance estimates Marin's 80+ population to more than double by that time. Housing needs criteria must be aligned with this changing aspect of our local population to clearly recognize all group living and assisted care facilities as an important component of the City's housing stock.

Employment Growth in Larkspur

While the Preferred Scenario has substantially reduced projected employment growth, the projection, at 750 jobs (10% growth), still remains aggressive regarding job growth in Larkspur, given past trends. Assuming a conservative estimate of one employee per only 200 square feet of commercial space, this scenario suggests new development of approximately 150,000 square feet of commercial space. Although some of this may be accommodated with back-filling of vacant space, it remains unlikely that back-filling would accommodate anywhere near 1/3 of this employment projection for Larkspur as suggested. As discussed above, the City of Larkspur is largely built-out and has not developed any new commercial space of significance in the last 20 years. Further, there is virtually no vacant land designated or planned for future commercial/office development other than a 90-room hotel site in Larkspur Landing. Because of historic gridlock conditions on Sir Francis Drake Boulevard and the Highway 101 Greenbrae interchange, the City's Circulation Policy C does not permit commercial expansions and or changes of use that

increase PM peak hour traffic. This level of employment development far exceeds what is available in Larkspur's jurisdiction along the Hwy 101 corridor and at Larkspur Landing, and would be contrary to the City's traffic limits policy. Along with opportunities for development of mixed-use commercial business, the SCS and transportation funding policies must recognize the growing trends towards home-based business, at-home services for the aging population, and the health care services.

Peer Review of Projections Methodology

As suggested by the Transportation Authority of Marin, as well as the County and other communities in Marin, Larkspur encourages ABAG to consider peer review of the projections by the Bay Area Council Economic Institute. Given the extent of public controversy and confusion on the matter, an independent peer review may help to verify if the projections are valid. As stated above, however, we remain concerned that further revisions of the Draft Scenario may result in continued re-distribution and/or revised methodologies that will significantly increase these projections to unrealistic proportions. We also suggest that the continued re-shuffling of data is undermining our ability to effectively engage the public in this process. As such, we encourage ABAG to consider the peer review and that any response or revisions to the methodologies should be concluded in a manner that further recognizes the lower and more realistic growth trends for Marin, based on our priority conservation areas, constrained transportation network, and aging population.

Local GHG Emissions Reduction Strategies

The Draft Preferred Scenario recognizes that other non-land use policies will need to be implemented in order to attain the target GHG emissions reduction goal of 15% for the Bay Area. It should be recognized that the City of Larkspur, in coordination with the County and many other Marin communities, is committed to implementing similar policies to reduce GHG emissions. The City of Larkspur adopted a Climate Action Plan (CAP) in June 2010 which seeks to reduce GHG emissions by 15% by 2020. Because Larkspur is largely built-out and fairly constrained in terms of growth, the CAP anticipates that over 97% of our GHG emission reductions will be achieved by promoting or supporting non-land use policies and measures such as: 1) walking and biking; 2) increased public transportation and ridesharing; 3) supporting electric vehicle use; 4) achieving carbon sequestration and emissions off-set through natural systems; 4) greenbuilding and energy efficiency retrofitting; 5) use of renewable; 7) waste reduction, recycling, and zero waste. For instance, the City has a bicycle and pedestrian plan that is coordinated with the County's masterplan. Larkspur is actively improving pedestrian, bicycle, and transit infrastructure and will be updating the plan to assure consistency with the Complete Street Acts. The City is funded to install three new EV stations on public sites and is assisting the Transportation Authority of Marin in the potential installation of additional sites on commercial properties. The City has adopted Cal Green Tier 1 building standards along with green-point rating standards for residential and commercial remodels. The City is also participating in the local Marin Energy Authority (MEA), which offers greater renewable energy options than provided by PG&E. Larkspur has adopted a Zero Waste goal and is in the process of adopting a construction & demolition debris recycling program to achieve no less than 94% diversion by 2025. These are just a few examples of policies and measures that the City has undertaken to promote GHG reduction in both the community and government operations.

Larkspur Station Area Plan

Larkspur also wants to reiterate that any increases in household and job numbers in Larkspur should not be based upon assumptions regarding the outcome for our Station Area Plan. The City of Larkspur has not applied for a PDA in this location, and the Station Area Plan is still in its initial stages of formation and background preparation. For numerous reasons discussed above, it may well be that the cost of infrastructure, lack of developable land, market forces, sea level rise, and other topographical and environmental constraints to those areas may truly preclude the type of development anticipated under these various ABAG scenarios. Again, our General Plan and vision for the area does not include high-rise densification as contemplated in the San Rafael's downtown and many other PDA's in the Bay Area due to constraints identified above.

Conclusion

On behalf of the Larkspur City Council, thank you for the opportunity to provide input into the process. We will continue to monitor the SCS process and look forward to reviewing the final Preferred Scenario when it is completed. We hope that the ABAG will look towards alternative methods to meeting the SCS goal targets, suggested by TAM and other communities, in a manner that remains consistent with Larkspur's long-term vision for housing and job growth.

Please contact me, or Senior Planner Neal Toft at (415) 927-6713, to discuss adjustments that may be made to the preferred scenario and supporting information.

Sincerely,



Signed on behalf of Anne Cronin Moore
Interim Planning Director

Neal Toft
Senior Planner

C: Ken Kirkey, ABAG Planning Director
Larkspur City Council
Dan Schwarz, City Manager



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E-mail: info@abag.ca.gov

May 2, 2012

Mr. Stephan Kiefer
Community Development Director
City of Livermore
1052 So. Livermore Avenue
Livermore, CA 94550

RE: Comments on Plan Bay Area

Dear Mr. Kiefer:

Thank you for your correspondence dated 4/20/2012 to our agencies concerning the Plan Bay Area Jobs-Housing Scenario and Transportation Investment Strategy.

Your comments will be presented to ABAG and MTC board members. Since the inception of Plan Bay Area, we have received numerous letters such as yours with detailed and thoughtful comments. ABAG and MTC staffs will present recommendations on a Preferred Scenario at a joint MTC Planning and ABAG Administrative Committee meeting on May 11, 2012.

Both agencies will meet jointly again on May 17 to approve a final Preferred Scenario. This will provide the basis for a draft Sustainable Communities Strategy (SCS) which will undergo an environmental assessment through the remainder of the calendar year. The draft SCS will be released at the end of this year, with adoption of a final SCS slated for April 2013.

We appreciate your concerns and suggestions. The outcome of this major planning effort will be better thanks to your participation.

Sincerely,

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Doug Kimsey
Planning Director
Metropolitan Transportation Commission

A handwritten signature in black ink, appearing to read 'Kenneth Kirkey'.

Kenneth Kirkey
Planning Director
Association of Bay Area Governments

April 20, 2012

RECEIVED

APR 24 2012

MTC

Mr. Steve Heminger
Executive Director
Metropolitan Transportation Commission
Joseph P. Bort MetroCenter
101 8th Street
Oakland, CA 94607-4756

Mr. Ezra Rapport
Executive Director
Association of Bay Area Governments
Joseph P. Bort MetroCenter
101 8th Street
Oakland, CA 94607-4756

RE: Jobs Housing Connection Scenario

Dear Mr. Heminger and Mr. Rapport:

The City of Livermore appreciates the opportunity to review and comment on the Jobs Housing Connection Scenario proposed as the preferred scenario for the SCS for the Bay Area. Livermore has worked with the Alameda County Planning Directors and the Alameda County Transportation Commission to review the previous scenarios developed to meet the targets of SB 375 to reduce greenhouse gas (GHG) emissions by 15 percent by 2035.

The Sustainable Communities Strategy (SCS) process and the Jobs Housing Connection Scenario were presented to the Livermore City Council on April 9, 2012. The City Council expressed several concerns regarding the SCS process, including:

- Jobs and housing numbers should more closely relate to the City's vision for local growth. The SCS has not taken constraints to growth sufficiently into account in terms of impacts to traffic, water, sewer, schools, etc.
- The loss of redevelopment agencies and related housing funds needs to be acknowledged. The suggestion that we look to non-profit organizations, such as Habitat for Humanity, to fill the affordable housing gap does not sufficiently address the problem.

- The information provided demonstrates that the majority of current jobs are located in close proximity to freeway interchanges. The Jobs Housing Connection Scenario redirects the development of jobs to transit corridors. While utilizing the existing transit network is appropriate, the distribution of jobs should also reflect local populations in terms of numbers, education, and incomes.
- It should also be noted that with telecommuting and other electronic means of conducting business, many companies no longer need large building complexes for all employees. Concentrating all future job growth along transit corridors is not appropriate given recent trends on how business is being conducted. We need to incentivize the local distribution of jobs in a way that matches local populations.
- Since the various scenarios presented do not meet the GHG emission reduction targets, additional means of reducing emissions must be considered, such as incentivizing electric vehicle use and construction of electric vehicle charging stations.
- The Job Housing Connection Scenario identifies the aging of our population as a significant demographic trend. We need to reflect the changes in our population in our funding priorities. The elderly are less likely to need bike lanes and more likely to need well planned convenient access to services.
- We do not live in an unconstrained world. We need to consider the impacts and constraints to growth and we need funding assistance, not just to plan for, but also to construct, needed infrastructure improvements.

Livermore recognizes the value of regional planning to address broader issues that cross-jurisdictional boundaries such as transportation and air quality. However, such regional planning should consider the unique circumstances and constraints that each local jurisdiction must face. While it is difficult to tailor broader regional efforts to suit individual circumstances, it is also unreasonable to expect a "one size fits all" approach to be viable at a local level. Implementation of the SCS must be a true partnership that recognizes each jurisdiction's rights and responsibilities with local control while balancing the needs and influences at a regional level.

The City of Livermore concurs with general concerns expressed by other local jurisdictions relating to the land use scenarios and eventual implementation. Developing land uses consistent with and in support of the targets of the SCS will require substantial commitments of local staff and financial resources. Planning studies and environmental review must be completed for Priority Development Areas (PDAs) and other infill areas, infrastructure improvements will most likely be needed to

support development beyond what is currently included in local General Plans, and community engagement at a local level will be a critical, on-going component for the successful implementation of the SCS. Considering that local governments' finances are already strained, the identification and provision of additional funding sources should be included in the SCS.

Over the past few years, each of the regional agencies, following its own mandate, has established policies and regulations in regard to development that can have significant impacts on the costs of infill development. For example, the Regional Water Quality Control Board has previously adopted standards on impervious surfaces and non-point source pollutants and the Regional Transportation Plan establishes through its guidelines how and where funding will be available for transportation improvements. Taken in isolation, each agency promotes critical governmental objectives; but in totality, they contribute to increasing constraints, complexity, costs and uncertainty for the development type we say we are interested in promoting: higher density infill. These regional regulations can have the unintended consequence of further impeding infill development that already faces numerous hurdles not faced by a greenfield project: nearby unhappy neighbors, highly uncertain site conditions, and unique design requirements, to mention just a few.

SB 375 provides an opportunity for the region to harmonize and standardize its requirements and to identify regional strategies that in combination can encourage infill development. The Environmental Impact Report (EIR) for the SCS and the analysis leading up to it are an unprecedented opportunity to consider how regional policies and mitigations can be harmonized and restructured to help even the playing field for infill development. We urge that as the regional agencies gear up for the EIR for the SCS and that they commit sufficient resources to undertaking the larger effort needed to work together to consider how they can make it easier – not harder – for infill development to occur.

Development of the SCS has also brought forward a number of other issues that have been considered impediments to the development patterns we wish to encourage, but that remain unaddressed year after year. These issues include the fiscalization of land use. So long as there are significant fiscal benefits from commercial/retail development, and significant long-term costs associated with residential development (and especially rental housing buildings that generally sell and are reassessed less often than single family homes), the promotion of appropriate development patterns will continue to face an uphill fiscal battle.

Another issue relates to transit availability. The SCS and the PDAs that will be the foundation of the SCS necessarily must rely on transit "nodes" as the basis for meeting housing needs. In order for developers and communities to invest in those locations, there is a need for certainty that the transit will be there for the long term, and that the

service will be adequate to address the demands placed on it. Meanwhile, over the past few years that certainty has been undermined by cutbacks on funding for transit. Future transit improvements need to be considered in light of implementing the land uses of the SCS and especially the very high intensity land uses identified in the PDAs. In Livermore's case, the two largest PDAs include the areas surrounding the future BART stations. While housing is important for determining and ensuring appropriate ridership numbers, MTC's Resolution 3434 does not account for employment in proximity to future BART stations as criteria for extensions. The majority of future residential and employment growth is anticipated in the Isabel and Greenville PDA's and both should be considered in determining future ridership numbers. Also, the majority of future growth in the SCS is being directed in a manner to utilize the existing and future transit system; therefore, employment as well as housing should be considered in planning transit extensions.

The City also has several comments on the Jobs Housing Connection Scenario report dated March 2012. These include:

- Page 13, Figure 4, Employment by Sector, Past and Future. The trend lines between 1990 and 2010 are not shown for construction jobs or agriculture and natural resources jobs.
- Page 49, Alameda County Future Place Types for PDAs map. The Protected Open Space only includes areas that are owned by regional recreation/open space agencies. Open space preservation is a constraint on local growth that should be fully acknowledged and considered. Protected open space also includes areas with conservation easements, such as in the South Livermore Valley vineyard areas, and lands under Williamson Act contracts. The approved Priority Conservation Areas should be clearly identified on this map. The open space areas are further protected by urban growth boundaries, such as the Livermore UGB, which should also be shown on the map.

In addition, information provided on the distribution of land uses in MTC traffic zones needs to be closely reviewed to ensure that future growth is directed to areas planned or anticipated for growth, such as the PDAs. To this end, the City requests the opportunity to meet with MTC and ABAG staff regarding the location of future growth within Livermore. For example, one traffic zone that covers a long-established residential neighborhood shows an increase of about 140 households by 2035, but a decrease in household population of over 1,000.

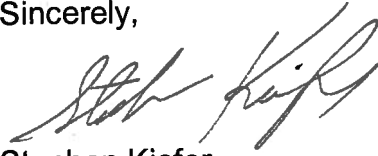
The City of Livermore will continue working with ABAG and MTC, as well as the Alameda County Transportation Commission, on addressing and resolving issues relating to development of the SCS.

Mr. Heminger and Mr. Rapport
April 20, 2012
Page 5 of 5

#34

If you have any questions, please contact Susan Frost, Principal Planner, at (925) 960- 4462, or by e-mail at smfrost@ci.ivermore.ca.us.

Sincerely,

A handwritten signature in black ink, appearing to read 'Stephan Kiefer', written in a cursive style.

Stephan Kiefer
Community Development Director

cc: Mayor John Marchand and City Council Members
Marc Roberts, City Manager
Paul Spence, Planning Manager
Susan Frost, Principal Planner
Ken Kirkey, Planning Director, ABAG
Doug Kimsey, Planning Director, MTC
Beth Walukus, Deputy Director of Planning, Ala. Co. Transportation Commission



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Fax: 510.817.5848
E-mail: info@mtc.ca.gov

Phone: 510.464.7900
E-mail: info@abag.ca.gov

May 3, 2012

Mr. David Kornfield
Planning Services Manager
City of Los Altos, Community Development Department
One North San Antonio Road
Los Altos, CA 94022

RE: Comments on Plan Bay Area

Dear Mr. Kornfield:

Thank you for your correspondence dated April 20, 2012, to Athena Ullah concerning the Plan Bay Area Jobs-Housing Connection Scenario and Transportation Investment Strategy.

Your comments will be presented to ABAG and MTC board members. Since the inception of Plan Bay Area, we have received numerous letters such as yours with detailed and thoughtful comments. ABAG and MTC staffs will present recommendations on a Preferred Scenario at a joint MTC Planning and ABAG Administrative Committee meeting on May 11, 2012.

Both agencies will meet jointly again on May 17 to approve a final Preferred Scenario. This will provide the basis for a draft Sustainable Communities Strategy (SCS) which will undergo an environmental assessment through the remainder of the calendar year. The draft SCS will be released at the end of this year, with adoption of a final SCS slated for April 2013. .

We appreciate your concerns and suggestions. The outcome of this major planning effort will be better thanks to your participation.

Sincerely,

Doug Kimsey
Planning Director
Metropolitan Transportation Commission

Kenneth Kirkey
Planning Director
Association of Bay Area Governments

>>> David Kornfield <DKornfield@losaltosca.gov> 4/20/2012 3:42 PM >>>

Dear Athena:

In reply to the recent survey please consider the following response from the City of Los Altos:

**Follow-up on Jobs-Housing Connection Housing Scenario
ABAG Request for Feedback
April 20, 2012**

1. Please provide your thoughts on the job and housing distribution methodologies utilized in the Jobs.

The City of Los Altos has strong concerns about the job and housing distribution methodologies used in the March 9, 2012 Jobs-Housing Connection Housing Scenario. It shows a projected Los Altos housing growth of 5,620 units from 2010 to 2040, which is a 50 percent increase over the existing housing units.

The use of a minimum 40 percent housing formation rate does not reflect the historic growth pattern of the City nor is it consistent with the goals SB375. Our State-certified Housing Element plans for much less growth. Building such an amount of housing distributed throughout the community, away from transportation corridors and jobs, will likely increase the vehicle trips.

2. Please provide any feedback on the housing and job growth distributions to your PDAs and your jurisdiction.

The March 9, 2012 draft Jobs-Housing Connection Scenario methodology assumes an unrealistically high 640 percent household growth rate for the El Camino Real corridor, a potential priority development area, which equals adding 4,662 housing units to the corridor. While we expect to see housing growth along the El Camino Real corridor consistent with the higher densities allowed, our State-certified, 2009-2014 Housing Element anticipates only adding 146 housing units to this area. El Camino Real is one of our most significant employment areas where creating such a significant amount of housing would exacerbate our jobs-housing imbalance.

We are also concerned about the projected job growth of 34 percent (5,020) for

Los Altos. According to our General Plan our historic job growth has been approximately nine to 10 percent with 12,890 jobs projected by 2020 (ABAG, Projections 2000).

3. Please review the data used to construct the distributions and provide any corrections. In particular, provide any corrections to the following data in the Jobs/Housing Connection Housing Distribution Details spreadsheet (provided):

- a. Local PDA Housing Unit Growth: column S ("All Areas" worksheet)
- b. Local Jurisdiction Housing Unit Growth: column H ("Jurisdictions" worksheet)

Unable to comment.

4. Do you believe that with this scenario your local jurisdiction can advance the goals and principles of the Sustainable Communities strategy?

The City of Los Altos supports the efforts of ABAG and MTC to comply with SB375 and the goals of the Sustainable Communities Strategy. The present housing growth models, however, do not reflect a realistic growth pattern for Los Altos. Not only is the model unrealistic, since Los Altos is a net provider of housing it exacerbates the Los Altos' jobs-housing imbalance and increases the vehicle miles traveled.

5. Additional Comments?

The City of Los Altos is concerned about the doubling of the RHNA projections from 317 units to 634 units. Since Los Altos is already an net provider of housing creating such housing numbers exacerbates our jobs-housing imbalance.

Thank you for the opportunity to comment and please call me with any questions.

David

David Kornfield, AICP
Planning Services Manager
Community Development Department
City of Los Altos
One North San Antonio Road
Los Altos, CA 94022

tel: 650-947-2632
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METROPOLITAN
TRANSPORTATION
COMMISSION



Association of
Bay Area Governments

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Phone: 510.464.7900
E-mail: info@abag.ca.gov

May 3, 2012

Mr. Steve Kinsey
President
Marin County Board of Supervisors
3501 Civic Center Drive, Suite 329
San Rafael, CA 94903

RE: Comments on Plan Bay Area

Dear Mr. Kinsey:

Thank you for your correspondence dated April 20, 2012, to Ezra Rapport concerning the Plan Bay Area Jobs-Housing Connection Scenario and Transportation Investment Strategy.

Your comments will be presented to ABAG and MTC board members. Since the inception of Plan Bay Area, we have received numerous letters such as yours with detailed and thoughtful comments. ABAG and MTC staffs will present recommendations on a Preferred Scenario at a joint MTC Planning and ABAG Administrative Committee meeting on May 11, 2012.

Both agencies will meet jointly again on May 17 to approve a final Preferred Scenario. This will provide the basis for a draft Sustainable Communities Strategy (SCS) which will undergo an environmental assessment through the remainder of the calendar year. The draft SCS will be released at the end of this year, with adoption of a final SCS slated for April 2013.

We appreciate your concerns and suggestions. The outcome of this major planning effort will be better thanks to your participation.

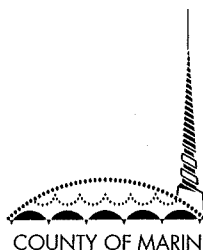
Sincerely,

A handwritten signature in black ink, appearing to read 'Doug Kimsey'.

Doug Kimsey
Planning Director
Metropolitan Transportation Commission

A handwritten signature in black ink, appearing to read 'Kenneth Kirkey'.

Kenneth Kirkey
Planning Director
Association of Bay Area Governments



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Mr. Ezra Rapport, Executive Director
 Association of Bay Area Governments
 101 Eighth Street
 Oakland CA 94607

SUBJECT: Comments on Draft Jobs-Housing Connection Scenario

Dear Mr. Rapport:

At their March 20 and April 17, 2012 meetings, the Board of Supervisors reviewed the recently released Draft Jobs-Housing Connection Scenario with particular attention to elements of the plan that affect Marin County. The Board raised the following issues and concerns for consideration by the Association of Bay Area Governments (ABAG):

- The County acknowledges that the fundamental economic, environmental and social equity benefits of the Sustainable Communities Strategy (SCS) reflect the basic framework of the Marin Countywide Plan for accommodating future growth. The County also recognizes that while Marin has been and will continue to be one of the slowest growing communities in the Bay Area, we recognize the need to accommodate a fair share of future regional growth in jobs and housing consistent with our local planning goals.
- From the local perspective, the methodology relied upon by ABAG to develop the future growth forecasts for Marin County and the unincorporated county has lacked sufficient clarity from the outset of the SCS process. We therefore endorse the City of Palo Alto's request that ABAG conduct a peer review analysis of the job and housing growth numbers in the Draft Jobs-Housing Connection Scenario. We suggest this analysis take into consideration, among other factors, the impact of home-based businesses on job growth. The County also recommends that job growth forecasts, and even more importantly the projected local housing requirements associated with those forecasts, be reexamined and adjusted, if appropriate, as the SCS is reviewed on a periodic basis consistent with a time horizon over which job forecasts can be made with a high level of confidence after its initial approval.
- In partnership with the Transportation Authority of Marin, the County commissioned an overview report by the Marin Economic Forum (MEF) of the forecasting methodology used by ABAG to develop growth projections for the Jobs-Housing Connection Scenario, as well as a strategy to consider for adjustments to the forecasts for Marin County. The resulting report is enclosed with this letter. ABAG has stated it is open to doing a peer review of

its forecasts, and has asked for input on how that might be done. At the end of the MEF analysis, in the Summary section, the report spells out several Scenario assumptions that may benefit from an alternative approach. The County suggests ABAG consider these factors as it pursues a peer review. Dr. Robert Eyler, who authored the report, has indicated that he is available to clarify any of these suggestions as needed.

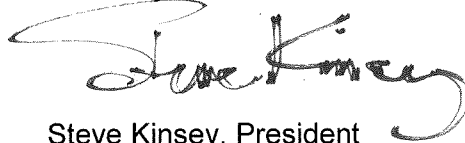
- When analyzing Marin County's employment levels during the period from January 1990 to August 2011, the data clearly illustrates that job growth has been negative in Marin over this two-decade span. Employment levels are lower now in our region than they were in 1990 and there has been a consistent decrease in employment since 2000. Based on this trend, it seems unrealistic that the County could see a 17 percent growth in the number of jobs between now and 2040.
- One aspect of the Draft Jobs-Housing Connection Scenario that appears prominently is the apparent lack of impact the elimination of the San Quentin Growth Opportunity Area has had on the unincorporated county's household growth as currently set out in the Draft Jobs-Housing Connection Scenario. The number of new households forecasted for the San Quentin property was roughly 35% - 50% of the unincorporated county's total household growth in the Detailed Scenarios. When the County chose to forego a Priority Development Area (PDA) status for the San Quentin property, we understood from ABAG staff that the subsequent regional redistribution of the household and job growth numbers would have a negligible impact on Marin. It stands to reason that, absent other factors unbeknownst to the County, the unincorporated county household growth forecast would have dropped by a larger margin by eliminating the San Quentin property from the Draft Jobs-Housing Connection Scenario. We would appreciate a clear explanation about the criteria used for the regional redistribution of growth from the San Quentin property as ABAG continues to refine the SCS.
- ABAG staff has recently informed us that household forecasts for several unincorporated counties may be adjusted to account for vacancy rates related to higher proportions of vacation rentals and second homes. A detailed explanation regarding the impact of this type of change on Marin would also be helpful.
- One of the distinct demographic trends affecting the Bay Area and Marin in particular is the sharp rise in senior population over the planning horizon of the Jobs-Housing Connection Scenario. The increased number of older residents is expected to create continued demand for senior housing, including assisted living arrangements and other group housing development. Future refinements to the household forecasts should take into account variations on senior housing demand at the sub-regional level.
- The urbanized area of the county is subject to limitations on domestic water supply. This is especially true in central and southern Marin where the Marin Municipal Water District (MMWD) is limited in its service capacity due to a

water delivery system that is primarily self-contained and dependent upon local rain fall. As noted in the 2007 Marin Countywide Plan, "At current increases in demand, MMWD projects an increasing deficit in supply that exceeds its estimates for what can be met through past methods of demand management." Over the past several years, the continued reliability of water from the Russian River, which is the primary source of water for the North Marin Water District, has become questionable in terms of the environmental and financial costs of our continued reliance upon this water source from outside the county. These constraints to future growth in Marin should be included in the Environmental Impact Report for the Preferred Scenario and reflected in the final SCS.

- As stated in the County's previous correspondence on the Detailed Scenarios, we reiterate our request that natural and policy constraints on both a local and regional level related to climate change, and especially sea level rise, be reflected in the SCS. In addition, Marin's role as a recreational hub for the Bay Area should continue to be considered in the One Bay Area transportation funding process.

Thank you again for the opportunity to review and comment on the latest version of the SCS. We appreciate ABAG's attention to the above comments as you continue to refine the SCS.

Sincerely,



Steve Kinsey, President
Marin County Board of Supervisors

Attachment: Marin Economic Forum, Draft Comments (April 16, 2012) on the ABAG/SCS Draft Jobs-Housing Connection Scenario.



MARIN ECONOMIC FORUM

April 16, 2012

Comments on ABAG/SCS Jobs-Housing Connection Scenario, March 9, 2012

Introduction

This brief report is meant to be educational and illustrative of the forecasting process for studies such as the March 9, 2012 Jobs-Housing Connection Scenario by ABAG/SCS (the Study). In short, the methods used for the Study are sound in terms of the assignment and data availability. Specific data and parameter considerations, specifically for Marin County, center more on the assumptions used to adjust the long-term forecasts than the methods. The Study uses a weighting scheme and data at the industry level to shape the employment forecasts. The Study's housing forecasts use transit data, the employment forecasts, and housing market data, also through a weighting system. The weighting systems are ad-hoc, but not outside what most forecasters would do to generate the Study's data.

Most long-term, employment forecasts use demographic projections (usually total population estimates for a specific geographic area) as a foundation. Such projections are usually accepted because long-term assumptions about how a population grows are relatively predictable. For example, birth and death rates do not change quickly under normal circumstances in emerged economies. Migration patterns may be more volatile, but should be relatively tied to recent history.

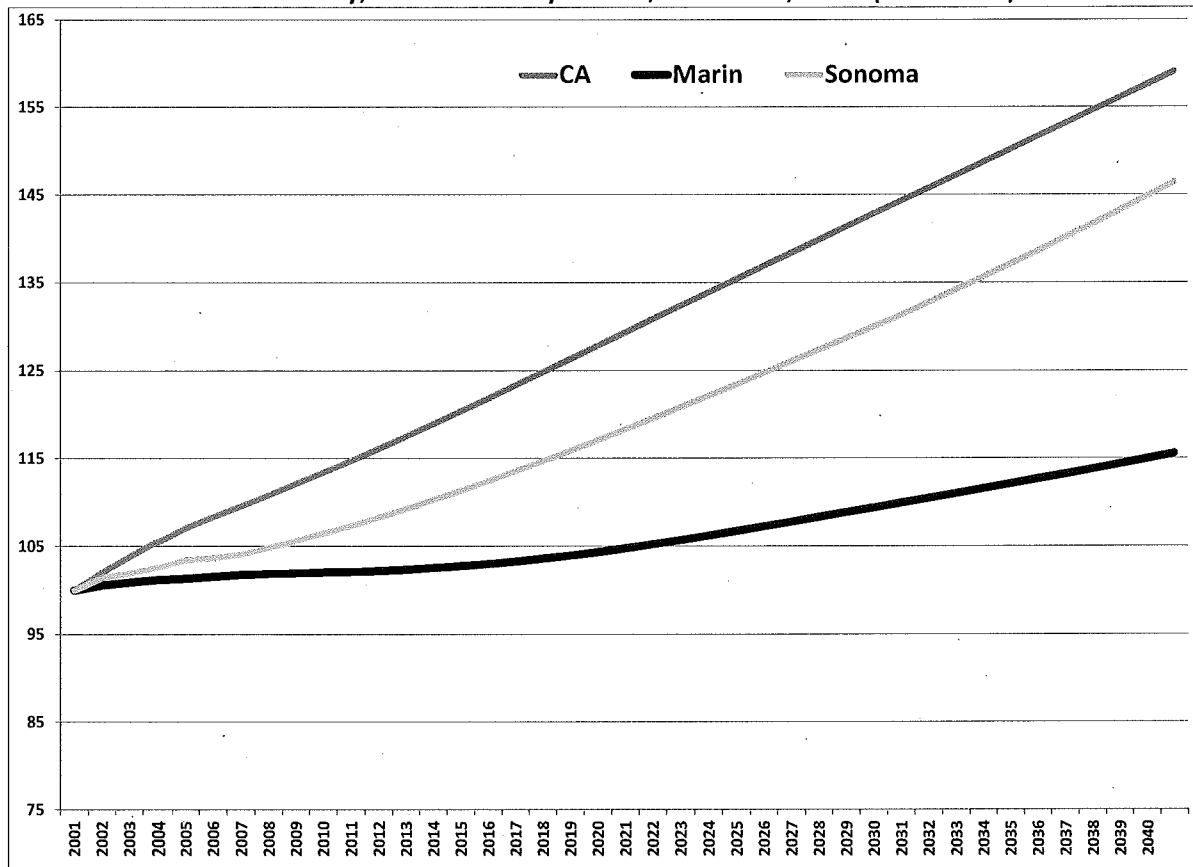
Forecasts boil down to two simple, statistical ideas: cycle and trend. Population cycles are generally long-term and culturally shaped; employment cycles change based on macroeconomic cycles. Predicting economic cycles well is a difficult task; most macroeconomists can provide a ballpark estimate for the amplitude and length of a current business cycle; after one "cycle" into the future, it is difficult to predict what would happen next. How easy would it have been to predict the 1990s employment cycle and then predict what happened from 2002-2007, and then what happened next? Not an easy task in 1995, and much easier in 2012. What economists fall back on when tasked with long-term forecasts is a prediction of long-term trend (a straight-line forecast) in an underlying variable (population); the trend or straight-line prediction reflects of the cycle's long-run, average growth. A straight-line prediction of long-term employment is a function of a straight-line projection for a population trend over time.

The California Department of Finance (DOF 2007) predicted population growth for all 58 counties in California through 2050; this prediction took place in 2007 with the Census 2000 as a benchmark. The DOF 2007 expected more Hispanic residents than actually came to Marin County according to Census 2010, but the overall population figures are close. The Census 2010 suggests Marin County's total population as 252,409; the DOF estimate from 2007 was 253,682. The estimate for Marin County's Hispanic population is 47,170 in the DOF 2007 figures for 2010; Census 2010 estimated 39,069 Hispanic residents in Marin for 2010. In Marin County, there were to be an estimated 181,215 Caucasian residents in 2010 according to DOF 2007; the Census 2010 estimates 201,963 Caucasian residents in Marin for 2010. Census 2010 suggests Marin County has 2.36 people per household in 2010; DOF estimates in 2010 are 2.44 people per household.

Figure 1 shows the growth rate of the Marin County population versus that of Sonoma and California overall. You will notice that the prediction is smooth over time in terms of the percentage

change from year to year, especially after 2018 which is where the cycle portion of the Study's forecasts end; a constant growth rate (or near constant) implies a straight-line forecast. Figure 1 converts the population forecasts from CA DOF to an index that begins in 2000 and moves to 2040 from there. Notice that Marin County's population is expected to grow over time, similar to the jobs prediction in the Study.

Figure 1: Population Projections
Marin County, Sonoma County and CA, 2000-2040, Index (2000 = 100)



Source: CA Department of Finance

The DOF 2007 population estimates for Marin County show a rise based on more Hispanic residents than any demographic group. If the 2000-2010 period is an indicator, the DOF 2007 population estimates could be overestimating population, which would then overestimate employment and housing demand. For 2040, DOF 2007 estimates 138,593 Hispanic residents versus 121,860 Caucasian residents, and a total population of 287,153 in Marin County. For this to happen, given the Census figures, there would need to be an exodus of close to 80,000 Caucasian residents and an inflow of over 99,000 Hispanic residents. At the Study's 2.44 people per household (where households are a proxy for housing demand), there would be a need to have a total of 117,686 housing units, or a 14,432 unit increase in demand. Let's look at how the Study did their forecast.

How the Study did its Forecasts

The Study gives “weights” to certain factors which shape the factor’s importance in the projections. Table 1 shows the base weights used for all municipalities in all nine counties. This section discusses the steps that seemed to have been taken to project employment and housing in Marin County from 2010 to 2040 by the Study.

The Study’s Employment Forecast Steps

While the local population growth is not explicitly part of the weighting, the Study uses the population growth and an assumed labor force participation rate to set the 2040 forecast for employment. The Study then assigns weights to sector-specific jobs to match the assumed, total growth. This implies that too high a population growth figure or too high a percentage of the population that is employed will overestimate the employment projections, which then has some bearing on the housing predictions. The steps are:

1. Start with industry-level jobs data (NAICS-2 Digit) for each of the industry “sectors” (ag, construction, Manufacturing, retail services, wholesale trade, professional services, personal services, education, health care, tourism, government) as the starting place in 2010;
2. Each sector has a current share of the total employment for each county, which acts as the base;
3. Growth in certain sectors is tied to population growth otherwise (construction, retail, health care, education), as these sectors are considered “population-servicing”;
4. Knowledge-based industry jobs are assumed to grow faster (professional services, information, financial services) across the region and are not tied to population growth; and
5. The final weighting is a mix of current employment, share of specific industry jobs, employees per square mile, and transit use and supply (using MTC projections).

Table 1: Weighting Method for Employment Projections in the Study, March 9, 2012

Index Weight	Weight	Base Data to Generate Projections to Modify Each Sector
Size of Employment Base	0.1	Average total employment 1990-2010
Size of Knowledge-based sector	0.1	Average knowledge employment 1990-2010
Knowledge-based concentration	0.2	Knowledge sectors location quotient 2010
Job Gravity	0.1	Share of county's jobs 2010
Knowledge-based Growth Capture	0.1	Share of knowledge-based job growth in county 1990-2000
Density of Employment	0.15	Employees/sq mile
Transit frequency	0.2	Average combined headway 2009 (minutes)
Transit coverage	0.05	% Intersections with Transit
Total	1.00	

Source: ABAG/SCS Jobs Housing Connection Scenario, March 9, 2012

Housing Demand Forecast Steps:

Housing demand in the Study uses the Census 2010 as its basis for total and occupied housing units; vacant housing units are the difference. The steps below attempt to account for both the demand and supply; the supply is considered from a local survey. The Study follows four steps in its housing forecast:

1. Housing Unit Growth was set based on potential growth of housing demand (from estimated population and household growth) and adjusted based on transit availability and transit demand patterns (vehicle miles traveled or VMT from MTC);
2. A $\pm 10\%$ adjustment is made based on a weighting for each jurisdiction, where the following are the categories of weights:
 - a. 2040 employment levels;
 - b. Net Low-Income, In-commuting workers; and
 - c. Housing values;
3. Growth is then scaled by jurisdiction to conform to regional totals (for Marin County, this step adds few adjustments outside of Novato and San Rafael); and finally
4. Jurisdictional-level growth was adjusted a final time based on local "surveys" to be sure that growth in each jurisdiction absorbs at least 5% of existing units.

The final step is a critical piece (and one of the least transparent) if one looks closer at the data. Almost all additions were in the unincorporated portions of Marin County (except for Belvedere which had 23 units added by this step) and subtractions were in Corte Madera, Larkspur, Novato and San Rafael.

In sum, the housing projections used a mix of data to generate supply and demand. The number of households projected for 2040 set the base growth of housing units to be demanded, and then adjustments were to this base growth primarily due to use of existing units, transit availability and patterns, and also job growth from the employment forecasts in the Study. This link between the two suggests that an inflated estimation of population, households, or jobs numbers could generate an inflated estimation of housing demand. However, housing demand seems to be more tied to transit centers and population growth patterns than those of employment growth.

Building a Jobs and Housing Forecast

Building a long-term, labor-market forecast depends on two major variables and their assumed, long-term values:

1. The percentage of the population that is employed¹; and
2. The proportion of labor force that will live and work locally.

The second assumption ties the jobs forecast to a housing demand forecast through three additional variables and their forecasted values from 2010 to 2040:

1. The potential housing units stock;
2. The current housing units occupied; and
3. The number of people per household.

¹ The labor force participation rate is the percentage of the population that is either working or actively seeking work and not working (the technical definition of being unemployed). Because the Study does not state an unemployment rate in 2040, we will use the percentage of the population that is employed instead. The sum of the employed and unemployed is the labor force. There are also people that work out of their homes as sole proprietors of businesses, but the data are not robust enough to distinguish employment that is duplicative between payroll employment and having a business on the side.

We will assume that the ABAG assumption here is one household per housing unit². A major variable of interest then becomes the number of people per household in terms of determining housing demand. The other major variable is the percentage of residents that live in Marin County versus work in Marin County. Slight changes to either of these can easily move a long-term trend in employment and housing demand down or up. Transit patterns can provide more shape to the forecasts, but it is difficult to figure out if transit availability pushes employment and population growth or is pulled by them. The Study puts a large amount of focus on transit patterns dictating both jobs and housing.

Once you have all those assumptions and estimates in place, the following steps should provide you with a forecast of jobs and housing:

Step 1: Decide on a long-term forecast as a foundational variable

- Use population forecasts as a foundation of jobs and housing growth;
 - Most economists, demographers, public policy makers agree that a good population forecast is possible (DOF's 2007 forecast is widely accepted as a "good" forecast).

Step 2: Find an estimate of the percentage of population that is employed for Marin County

- This can be found through national and state estimates of jobs and population together, providing a percent of the population currently employed:
 - The Study's data point is 43.8% in 2010;
 - The Study's data point is 45.3% in 2040 (this is close to the average from 1985-2010);
 - Using data from the Bureau of Economic Analysis Marin County's percent employed of the population was 45.1% based on payroll employment; and
 - In 2000, the BEA reports 48.8% based on payroll employment.

Step 3: The employment and population projections generate housing demand

- a. Housing demand is a function of population growth mainly;
- b. An estimate of the number of people per household is then needed to determine the number of households from the population;
- c. Housing Demand is projected based on the estimated number of households, housing supply and current vacant units.

Step 4: Housing units available may be constrained by the plausible supply

- a. For Marin County, this should be estimated by developable land and some estimate of number of housing units per developable acre per current general planning norms.
- b. It is possible that the estimated housing demand will exceed the plausible supply, which constrains housing choices for residents and workers alike, resulting in increased commuting? which can affect the number of jobs;
- c. The Study assumed that the housing supply would meet or exceed demand to allow for vacant units and ability to build more after 2040.

² See the first paragraph of page 9 in the Study. An estimated 700,000 new households make demand 660,000 new housing units plus 40,000 currently vacant. This shows the assumption of one unit per household.

Brief Comment on the projections for Marin's Cities and Towns

From the projections above, a forecaster can use the Longitudinal Employment and Housing Dynamics (LEHD) database from the U.S. Bureau of Census to estimate employment and housing demand in cities, towns and unincorporated areas. This database combines Internal Revenue Service (IRS) data on where people work and live with payroll employment data from the Bureau of Labor Statistics to generate annual estimates of commuting patterns, workforce patterns by industry, wages, and other data. For this exercise, the LEHD was likely used as a way to tie the broader forecasts to local municipalities. Appendix 2 of the Study is where these data were combined with the countywide forecasts.

For example, if payroll employment in Marin County is 110,730 workers in 2010, and we project that to be 130,030, each city and town in Marin County will be assumed to remain a similar proportion over time, with some slight adjustments San Rafael and Novato are roughly 20% of total employment in Marin County each over time, and have been for the extent of the data (LEHD starts in 2002), this is a reasonable assumption to make going forward. Take 20% of 140,000 for each city, find a constant growth rate that joins the 2010 actual numbers to the 2040 estimated value, and both a straight-line forecast is born and an estimate for midpoints is also available. This can be done for all municipalities and county sub-areas as defined by the Census Bureau for Marin County. It can also be done for all the industries in Marin County, by city and county sub-area, using the LEHD data. For example, Marin City can be predicted though it is not an incorporated city or town; it is a defined county sub-area in the Census data. The city projections in the Study follow this logic in terms of how the baseline forecast was built, and then changed by the adjustment factors discussed above. Housing projections at the city or town level would come from households/housing unit histories and the current number of housing units from Census data.

Brief Comment on Adjustment Factors

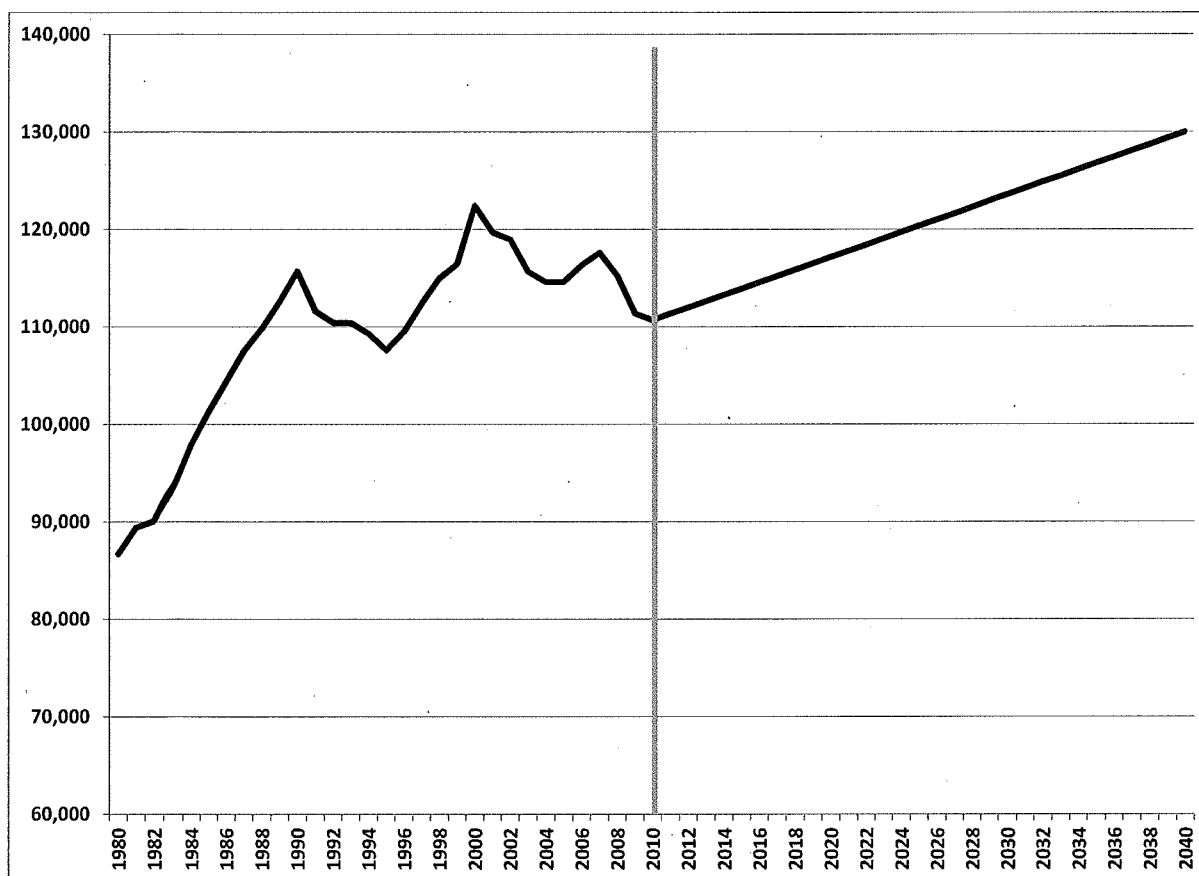
While the tables and figures referenced above are important in understanding how the Study came up with the projections in the March 9, 2012 report, it is the table and discussion on pages 65-66 in the Study's Appendix 5 that is maybe the most enlightening. This table, "Transit-VMT Tier Adjustment Rates", provides data that shows how the straight-line projections may have been adjusted to accommodate differential assumptions between cities and counties. For example, Santa Clara County may have the same or similar population projections with respect to Alameda County, but Santa Clara County may be assumed to be a more vibrant jobs generator. As a result, the speed of job growth needs to be adjusted upward with respect to population growth, or the growth of jobs (and thus housing demand in part) will be similar in Alameda and Santa Clara counties.

The adjustment factors were determined by a somewhat ad-hoc process, but a process that makes the generation of many projections very easy in a spreadsheet once decided. These numbers are going to increase or decrease the speed of growth, starting with the employment forecasts for each county, which will then trickle down to the city-level forecasts. In terms of industry projections, Marin County is likely to be more biased toward professional and personal services jobs than agriculture and manufacturing based on demographic shifts (older, wealthier residents) and less space for the growth of goods-producing industries. There may be some more growth in hospitality jobs, recreation, but that will depend on how much Marin County moves toward more tourism strategically in economic development. Similar discussions can be had for all the industries.

The adjustment factors and process assigned to Marin County from pages 65-66 in the Study shape the final numbers. Figure 2 shows the history of Marin payroll employment (from 1980 to 2010) and connects it to the ABAG/SCS projections to 2040; the 2010 and 2040 employment figures are

connected by a straight line as a reflection of the implicit trend in the Study's projections between 2010 and 2040.

Figure 2
Marin County Payroll Employment 1980-2010 and ABAG/SCS Projections through 2040



Sources: ABAG/SCS Jobs-Housing Connection Scenario and Bureau of Labor Statistics (BLS)

Summary

The ABAG/SCS Jobs-Housing Connection Scenario (the Study), given the assignment to generate a nine-county, thirty-year forecast of jobs and housing demand, is done as most economists would approach the issue. The forecasts for Marin County are generated from a solid foundation, and a methodology that almost any economist or demographer would follow with the same task assigned. This is a difficult task to complete to everyone's satisfaction, and it is not surprising that Marin County has found some flaws and issues with the local estimations such as too fast a growth rate of jobs and housing units from a local perspective.

In terms of considering adjustments to the Study's forecasts for Marin County, I recommend the following approach, which focuses on the assumptions made about Marin County's future and comparisons to the other, eight Bay Area counties:

- If the jobs numbers seem too high, the high numbers come from one or a combination of three issues:

- Percentage of population employed in Marin County residents too high between 2010 - 2040;
- The trend in job growth, which is the Study's adjustment factor against the long-term forecast based on population growth, is too high (see pages 65-66 in the Study);
- The population trends and the jobs trends are not a match (the population trend is too fast in terms of growth versus what Marin County will gain in terms of new jobs).
- **If the housing numbers seem too high, the high numbers come from a combination of three issues:**
 - The number of people per household to occupy a housing unit is assumed at too low a level (more housing demand per person than it should be);
 - The number of residents in Marin County through 2040 is estimated at too large a level; and
 - The adjustment based on transit data and housing supply are too large for Marin County.

In short, the ABAG/SCS projections are done well methodologically, but adjustments could be made to the assumptions concerning Marin County which would likely reduce the overall figures. Many of these adjustments in the steps above are ad-hoc and use round numbers to generate the final data. Most studies would use round numbers. However, it is also possible that adjustments of the assumptions can produce figures that would further enhance the figures.

References

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<<[http://www.onebayarea.org/pdf/SCS Preferred Scenario Jobs Housing Connection 3.9.12.pdf](http://www.onebayarea.org/pdf/SCS_PREFERRED_Scenario_Jobs_Housing_Connection_3.9.12.pdf)>>, March 20, 2012

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Association of
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May 2, 2012

Mayor Garry Lion
City of Mill Valley
26 Corte Madera Avenue
Mill Valley, CA 94941

RE: Comments on Plan Bay Area

Dear Mayor Lion:

Thank you for your correspondence dated 4/20/2012 to Ezra Rapport concerning the Plan Bay Area Jobs-Housing Scenario and Transportation Investment Strategy.

Your comments will be presented to ABAG and MTC board members. Since the inception of Plan Bay Area, we have received numerous letters such as yours with detailed and thoughtful comments. ABAG and MTC staffs will present recommendations on a Preferred Scenario at a joint MTC Planning and ABAG Administrative Committee meeting on May 11, 2012.

Both agencies will meet jointly again on May 17 to approve a final Preferred Scenario. This will provide the basis for a draft Sustainable Communities Strategy (SCS) which will undergo an environmental assessment through the remainder of the calendar year. The draft SCS will be released at the end of this year, with adoption of a final SCS slated for April 2013.

We appreciate your concerns and suggestions. The outcome of this major planning effort will be better thanks to your participation.

Sincerely,

A handwritten signature in black ink, appearing to read 'Doug Kimsey'.

Doug Kimsey
Planning Director
Metropolitan Transportation Commission

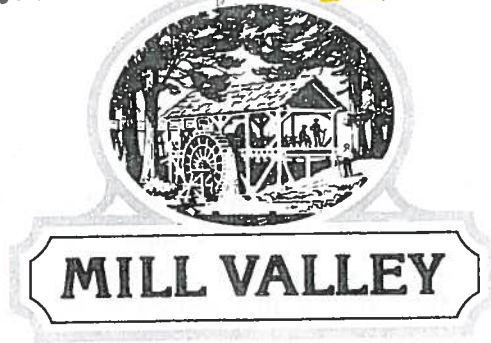
A handwritten signature in black ink, appearing to read 'Kenneth Kirkey'.

Kenneth Kirkey
Planning Director
Association of Bay Area Governments

Gene. Ann. Doug. P.I.

#37

Garry Lion
Mayor
Andrew Berman
Vice Mayor
Shawn Marshall
Councilmember



Stephanie Moulton-Peters
Councilmember
Kenneth R. Wachtel
Councilmember
James E. McCann
City Manager

RECEIVED
APR 23 2012
MTC

April 20, 2012

Mr. Ezra Rapport
Executive Director
Association of Bay Area Governments
101 Eighth Street
Oakland, CA 94607-4700

RE: City of Mill Valley Comments Regarding the Sustainable Communities Strategy Draft "Jobs-Housing Connection" Preferred Alternative

Dear Director Rapport:

The City of Mill Valley continues to carefully follow the development of the Sustainable Communities Strategy (SCS) mandated by Senate Bill 375. Members of the City Council have been participating in the countywide review of the various scenarios through the "SCS Ad Hoc Committee" established through the Transportation Authority of Marin (TAM). You are also probably aware that some in Marin County are strongly encouraging its local governments to withdraw from ABAG and form a separate countywide council of governments. The Mill Valley City Council has not yet discussed our status as a member of ABAG, but the lack of transparency in the methodology used to develop scenarios; the lack of time to carefully consider the implications of the SCS recommendations; and the lack of a meaningful public process have all contributed to an unfortunate atmosphere of County-wide mistrust and confrontation that makes any discussion about the SCS difficult.

Like the other small cities and towns in southern Marin County, we are particularly concerned about and need further clarification on the assumptions and methodology used to assign projected job and housing numbers to Mill Valley. We also need to better understand how an approved SCS, based on the projected housing and job numbers in the Preferred Scenario, may influence other policy directives over time, such as the Regional Housing Needs Allocation (RHNA) process, and the potential impact of those policies on the character of our community.

In the spirit of helping all cities in Marin better understand SCS and its rationale, the City of Mill Valley invited Mr. Ken Kirkey and Ms. Julie Pierce to address the Marin County Council of Mayors and Councilmembers (MCCMC) at our Mill Valley Community

Center on March 28th. Over 80 Marin Mayors, Councilmembers, County Supervisors and government staff attended the dinner, and about 60 members of the public joined us for the after-dinner program. In advance of the meeting, we canvassed all the other cities to assemble a list of 23 specific questions they really wanted answered and sent these to Mr. Kirkey so he could be well prepared to focus on answering them. Unfortunately, he decided to give a SCS overview presentation which failed to answer many of the key questions. This was a golden opportunity to hit a home run with some in-depth, factual answers to specific questions posed by an anxious audience, but it ended with a lot more frustration instead.

The members of the Mill Valley City Council and our staff take pride in our ability to offer timely, informed and well-reasoned comments in response to the major issues and initiatives that affect our City. However, the short time frames, incomplete information and, at times, difficult to comprehend numbers have stymied our best efforts to be effective participants in this process. It is incumbent on ABAG and MTC to address this disconnect now and on into the future, if the SCS and your respective agencies are to maintain integrity and broad-based support from the local governments you serve.

Nevertheless, the Mill Valley City Council will be conducting a joint meeting with our Planning Commission in May (first chance have been able to get them together) to discuss housing and ABAG issues including the SCS process and status. Following that meeting, we will develop a comprehensive response and position which we will communicate to you shortly thereafter.

Sincerely,



Garry Lion
Mayor

cc: City Councilmembers
City Manager
Steve Heminger, Executive Director, Metropolitan Transportation Commission
Diane Steinhauser, Transportation Authority of Marin



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#38

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E-mail: info@mtc.ca.gov

Phone: 510.464.7900
E-mail: info@abag.ca.gov

May 2, 2012

Mayor Denise Athas
City of Novato
75 Rowland Way, Suite 200
Novato, CA 94945-3232

RE: Comments on Plan Bay Area

Dear Mayor Athas:

Thank you for your correspondence dated 4/20/2012 to ABAG concerning the Plan Bay Area Jobs-Housing Scenario and Transportation Investment Strategy.

Your comments will be presented to ABAG and MTC board members. Since the inception of Plan Bay Area, we have received numerous letters such as yours with detailed and thoughtful comments. ABAG and MTC staffs will present recommendations on a Preferred Scenario at a joint MTC Planning and ABAG Administrative Committee meeting on May 11, 2012.

Both agencies will meet jointly again on May 17 to approve a final Preferred Scenario. This will provide the basis for a draft Sustainable Communities Strategy (SCS) which will undergo an environmental assessment through the remainder of the calendar year. The draft SCS will be released at the end of this year, with adoption of a final SCS slated for April 2013.

We appreciate your concerns and suggestions. The outcome of this major planning effort will be better thanks to your participation.

Sincerely,

Doug Kimsey
Planning Director
Metropolitan Transportation Commission

Kenneth Kirkey
Planning Director
Association of Bay Area Governments



THE CITY OF
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CALIFORNIA

75 Rowland Way #200
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Mayor
Denise Athas
Mayor Pro Tem
Pat Eklund
Councilmembers
Madeline Kellner
Eric Lucan
Jeanne MacLeamy
City Manager
Michael S. Frank

Steve. Ann. Doug K. [redacted]

#38

April 20, 2012

Mr. Mark Luce, President
Association of Bay Area Governments
P. O. Box 2050
Oakland, CA 94607-4756

RECEIVED
APR 24 2012
MTC

Re: City of Novato Comments on SCS Preferred Alternative
Jobs-Housing Connection Scenario

Dear Mr. Luce:

At its April 16, 2012 meeting, the Novato City Council reviewed the SCS Preferred Alternative: The Jobs-Housing Connection and the SCS process to date. We thank you for the opportunity to comment on the Jobs-Housing Connection Scenario. The timing of the SCS process has been challenging for ABAG and MTC staffs and especially for our Community Development staff that has been substantially reduced during the SCS process.

As communicated in our March 14, 2012 letter to you, the City of Novato finds that the forecasted job growth appears too high for the period from 2010 to 2040 for the following reasons:

- 1) During the last 30 years (1980 to 2010), the City of Novato experienced a base closure which resulted in growth of jobs and housing due to a increase in available land that will not be repeated during the next 30 year cycle;
- 2) Our Urban Growth Boundary, smaller than LAFCO's adopted Sphere of Influence, was adopted by the voters and limits land available for job and housing growth; and,
- 3) Novato has experienced a large number of foreclosed homes compared to other cities in Marin County.

The City of Novato supports the concept that jobs and housing growth should be focused within the Priority Development Areas. While jobs and housing projections for the City of Novato in the Job-Housing Connection Scenario appear more consistent with our General Plan and prior recommendations made by City staff and elected officials, we remain concerned about the methodology for the jobs projections. For example, the baseline maps recently sent to our staff by MTC staff contained several errors. Our staff is still reviewing corrected maps just received late this Wednesday. Those mapping errors concern us as we believe such maps were an important input to the methodology used for the jobs and housing projections in the SCS process to date.

As recommended in our previous letter, we support ABAG staff's commitment to peer review of the economic modeling and projections methodologies, but such information is not yet available for public review. Also, new information has just been released by the County of Marin and made a part of its current letter regarding the Jobs-Housing Connection Scenario. We would appreciate an explanation of how the Regional Jobs Growth was distributed amongst the nine counties and 101 cities in the San Francisco Bay Area.

As an aside, we note that the projected housing units and households remained the same for the City of Novato (890 vs. 890), whereas the ABAG projections for the other cities in Marin reflected a difference between the housing units and households. Our staff would appreciate an explanation of this from your staff.

We remain concerned that the projections, especially for jobs, remain too high for Novato. The Preferred Scenario mentions some constraints within Marin and the City of Novato, however, there are some additional constraints that were not discussed in the Preferred Scenario which need to be included in the next revised version including:

- 1) Pages 8 and 39 mention growth constraints. The City of Novato receives the lowest share of property tax among cities in Marin. Our domestic water mostly comes from the Russian River that has been under additional restrictions due to environmental issues. The other cities in Marin are served by a different Water District.
- 2) Page 29 mentions that much of the land in Marin County is protected as open space and by the Water Districts in the County. Please note that a significant portion of the land in Marin County is owned by the State and Federal Government as parts of the State and National Parks systems.

The Jobs-Housing Connection Scenario does mention that the major mechanism local governments had for economic development was Redevelopment, recently eliminated by the State of California. The Preferred Scenario needs to emphasize that currently there are no other mechanisms available for most local governments, including Novato, to help facilitate economic development, especially affordable housing.

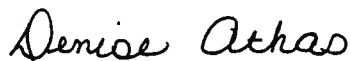
The Jobs-Housing Connection Scenario mentions, on page 14, that there is an anticipated change in office design in the future. The scenario should include how this major change is already underway and expected to increase, via teleworking and home occupations. The Scenario relies on the same estimates for those types of jobs/job locations from over a decade ago. We recognize the challenge that making this change to the methodology presents, but given the

increased numbers of jobs 'at home' or in 'satellite offices', it needs to be reflected in the Job-Housing Connection Scenario.

Being located in the "oldest" county--in terms of the age of our residents--in the state, we commend ABAG for recognizing the significant number of 'older adults' that will be in Marin County and especially in Novato. We would appreciate ABAG assistance in convincing the California Department of Housing and Community Development that changes to the definitions for housing units as they pertain to seniors is overdue. We have preliminary data that shows local housing stock is recycled when older citizens move into specialized senior housing to meet their needs.

Novato staff and elected officials look forward to a very open and superior environmental review of the Preferred SCS Scenario in the coming months and will be commenting further when more information is available. Again, thank you for the opportunity to comment. Your and MTC's staffs have been very generous with their time working individually with planners in Novato and other cities and attending events like MCCMC. We welcome your responses and the information that we have requested in this, and previous, letters. Please feel free to contact Anne Moore, Interim General Plan Manager at amoore@novato.org.

Sincerely,



Denise Athas, Mayor

cc: City Council
City Manager
City Attorney
City Interim General Plan Manager
Planning Commission
Metropolitan Transportation Commission, Attn: Steve Heminger
League of California Cities, Attn: Dan Carrig
Transportation Authority of Marin, Attn: Dianne Steinhauser



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Phone: 510.464.7900
E-mail: info@abag.ca.gov

May 3, 2012

Mr. Michael Bills
Senior Planner
City of San Jose
200 E. Santa Clara Street
San Jose, CA 95113

RE: Comments on Plan Bay Area

Dear Mr. Bills:

Thank you for your correspondence dated April 20, 2012, to Athena Ullah concerning the Plan Bay Area Jobs-Housing Connection Scenario and Transportation Investment Strategy.

Your comments will be presented to ABAG and MTC board members. Since the inception of Plan Bay Area, we have received numerous letters such as yours with detailed and thoughtful comments. ABAG and MTC staffs will present recommendations on a Preferred Scenario at a joint MTC Planning and ABAG Administrative Committee meeting on May 11, 2012.

Both agencies will meet jointly again on May 17 to approve a final Preferred Scenario. This will provide the basis for a draft Sustainable Communities Strategy (SCS) which will undergo an environmental assessment through the remainder of the calendar year. The draft SCS will be released at the end of this year, with adoption of a final SCS slated for April 2013.

We appreciate your concerns and suggestions. The outcome of this major planning effort will be better thanks to your participation.

Sincerely,

Doug Kimsey
Planning Director
Metropolitan Transportation Commission

Kenneth Kirkey
Planning Director
Association of Bay Area Governments

From: Michael Bills <notifications@bayarea.basecamphq.com>
To: Athena Ullah <AthenaU@abag.ca.gov>
Date: 4/20/2012 11:32 AM
Subject: [Santa Clara County] Re: Feedback by April 20th

Reply ABOVE THIS LINE to add a comment to this message

Project: Santa Clara County
Company: SCS Working Group



Feedback by April 20th

ABAG/MTC Staff,

At this time, the City of San Jose would like to offer the following comments and observations:

1. **Regional Job Share:** Santa Clara County's share of future regional job growth has been notably reduced, from 31% in both Projections 2009 and the Initial Vision Scenario, to just 26.5% in the J-H Connection Scenario. The direction of this change is inconsistent with San Jose's recently-adopted Envision 2040 General Plan, in which, as the nation's 10th largest city, we strive to maintain a leadership position with very ambitious job creation goals supported by planned regional transportation infrastructure investments. We suggest that a one-third (33%) share allocation is more appropriate.
2. **Proven Job Gains:** recent job gains in the San Jose metro area have been among the strongest in the nation, lending credence to much more aggressive future job growth targets. For example, the latest preliminary monthly jobs data (March) released by the State EDD this morning, indicate year-over-year growth of approximately 30,000 jobs in the San Jose-Sunnyvale-Santa Clara MSA. In fact, job growth just since January 2010 amounts to 21% progress towards achievement of the total 2010-2040 job gain identified in the J-H Connection Scenario--a rather remarkable statistic for such a short timeframe, and highly suggestive of the need to increase our share as cited in item #1 above.
3. **Existing Capacity:** as a parallel to item #2 above, due to strong growth experienced during much of the last decade-and-a-half, San Jose has the demonstrated capacity (human and physical) to accommodate significant job gains in the relative near term. The J-H Connection Scenario acknowledges that "about one-third of these [1.1 million regional] jobs could potentially be accommodated within existing offices and facilities given current vacancy rates relative to higher job levels in 2000." In other words, there is a positive side to current high levels of unemployment and building vacancy: we have the ability (and track record) to snap back rather quickly.
4. **Demographic Trends:** San Jose is in agreement with the major demographic trends identified in the J-H Connection Scenario, particularly as it relates to a long-term

decline in the rate of labor force participation (Note: assumptions in the J-H Connection Scenario represent a significant departure from Projections 2007 and Projections 2009, in which expectations for a 2035 return to the unusually high labor force participation rate of year 2000 were subject to question).

5. **PDA-Level Housing Allocation:** the aggregate figure of J-H Connection Scenario housing units is consistent with the Envision 2040 General Plan. However, we recommend two changes with respect to PDA-level allocation of these units: (a) reversal of the figures associated with the "Downtown Core" (SJO1) and "Downtown Frame" (SJO4); and, (b) reduction of the housing associated with the "Hitachi Transit Village" (SJO2), as existing entitlements and expectations suggest a much more conservative ~3,000 units yield.

Finally, San Jose wishes to thank ABAG/MTC staff for provision of the jobs and housing details at the PDA level along with availability of the associated GIS data, as this approach helps facilitate spatial analysis and satisfies San Jose's comments on the Initial Vision Scenario, submitted via BaseCamp on 5/24/11. We look forward to your careful consideration of the above comments, as well as release/review of the Final Draft One Bay Area plan. Thank you.

This comment was sent to Aarti Shrivastava, Athena Ullah, Bill Shoe, C Miranda, Curtis Williams, David Bischoff, David Kornfield, Dawn Cameron, Debbie Pedro, Eric Anderson, Erin McGranahan, Gary Chou, Hanson Hom, James Lindsay, James Walgren, Jody Hall Esser, John Baty, John Livingstone, John Sighamony, Justin Fried, Kevin Riley, Kirk Heinrichs, Laurel Prevetti, Martin Alkire, Megan Doyle, Michael Bills, Mike Donohoe, Paul Kermoyan, Paul Ma, Randy Tsuda, Roland Rivera, Scott Strickland, Sheldon Ah Sing, Steve Piasecki, Steve Ross, Steven Turner, Suzanne Ise, Trudi Ryan, Vera Gil, Wayne Chen, Wendie Rooney, and Whitney McNair.

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May 3, 2012

Ms. Denise Peter
Planner III
County of Sonoma
Permit and Resource Management Department
2550 Ventura Avenue
Santa Rosa, CA 95403-2829

RE: Comments on Plan Bay Area

Dear Ms. Peter:

Thank you for your correspondence dated April 20, 2012, to Athena Ullah concerning the Plan Bay Area Jobs-Housing Connection Scenario and Transportation Investment Strategy.

Your comments will be presented to ABAG and MTC board members. Since the inception of Plan Bay Area, we have received numerous letters such as yours with detailed and thoughtful comments. ABAG and MTC staffs will present recommendations on a Preferred Scenario at a joint MTC Planning and ABAG Administrative Committee meeting on May 11, 2012.

Both agencies will meet jointly again on May 17 to approve a final Preferred Scenario. This will provide the basis for a draft Sustainable Communities Strategy (SCS) which will undergo an environmental assessment through the remainder of the calendar year. The draft SCS will be released at the end of this year, with adoption of a final SCS slated for April 2013.

We appreciate your concerns and suggestions. The outcome of this major planning effort will be better thanks to your participation.

Sincerely,

Doug Kimsey
Planning Director
Metropolitan Transportation Commission

Kenneth Kirkey
Planning Director
Association of Bay Area Governments



COUNTY OF SONOMA
PERMIT AND RESOURCE MANAGEMENT DEPARTMENT

2550 Ventura Avenue, Santa Rosa, CA 95403-2829
(707) 565-1900 FAX (707) 565-1103

April 20, 2012

Athena Ullah
Association of Bay Area Governments
PO Box 2050
Oakland CA 94604-2050

Dear Ms. Ullah,

Thank you for the opportunity to provide an initial technical response on the Jobs Housing Connection Scenario, received March 2012. We have reviewed the GIS data and Excel spreadsheets and note that there appears to be some discrepancies between the different sources of data.

The County is in conceptual agreement with the 2040 long term strategy of community-centered, compact growth policies represented in the Jobs Housing Connection Scenario.

Our specific comments on this latest scenario are:

1. **Priority Development Areas.** It is our understanding that staff has assumed in the JHC scenario that the County's proposed PDA's of: Larkfield, Graton, Sonoma Valley, Penngrove, Forestville, and Guerneville will be approved by the Regional Planning Committee June 6, and the ABAG Executive Board on July 19.

We continue to request that the entire proposed Airport/Larkfield PDA be designated a PDA in the JHC Scenario. We understand that the Airport Business Park portion of our proposed Airport/Larkfield PDA was not recommended by ABAG staff due to a current lack of transit service with 20 minute headways during commute hours.

Please note that on April 19, 2012, the Sonoma Marin Area Rail Transit (SMART) Authority officially announced that the SMART Board of Directors has purchased a site in the Airport Business Park for an additional future train station for passenger service and operations and maintenance facilities. This is a critical first step in providing passenger rail service to serve the thousands of employees in the Airport Business Center Employment Center, and in providing a connection to air passenger service at the Sonoma County Airport. Obtaining PDA status for this area is important in order to be eligible for planning and capital improvements funding that is limited to PDA's. The SMART press release can be viewed at:

<http://main.sonomamarintrain.org/wp-content/uploads/2012/04/SMART-OMF-Press-Release-4-19-12.pdf>

2. **Total Housing Units and PDA.** We are generally in agreement with the total housing growth rate in Unincorporated Sonoma County from 2010 to 2040 of approximately 186 units/year (5,571 total), as shown on the "Jurisdictions" Sheet of the Jobs-Housing Connection Distribution Detail Excel Workbook, posted on the ABAG Base Camp website in March 2012. We also concur with the use of the average vacancy rate in the unincorporated County of 16% as reported in Census 2010. This vacancy rate reflects the higher percentage of second homes and vacation rentals in the unincorporated area as compared to the Cities.

The total new housing unit projection of 5,571 by 2040 results in a growth rate that is less than our current General Plan 2020 growth rate, and less than what was projected in the Initial Vision Scenario. However, it is more in line with the economic downturn, a general political shift in Sonoma County that calls for growth in Cities and County Urban Service Areas, changes in housing market conditions, and the actual unincorporated County housing unit growth rate as reflected in the State Dept. of Finance annual housing unit count reports for the last decade.

3. **Housing Distribution.** Distribution of housing units is shown in the ABAG JHC Housing Distribution Detail workbook, 3/12, on sheet "All Areas". We are in agreement with the new housing unit growth for proposed PDA's on this sheet that reflects the County's estimated 2010-2040 new housing unit growth (~3,400 units) in our PDA Applications distributed as follows:

- Larkfield: 600
- Graton: 453
- Sonoma Valley: 1,124
- Penngrove: 388
- Forestville: 416
- Guerneville: 425

However, we note the following discrepancy between the following two sheets of this workbook and ask for clarification of which numbers will be used in the JHC Scenario and for the RHNA.

Table: New Housing Units 2010-2040 Unincorporated Sonoma County

	JHC Housing Distribution Detail Workbook, 3/12	
	Jurisdictions Sheet	All Areas Sheet
PDA's	2,801	3,398
Non-PDA's	2,770	357
Total	5,571	3,755

In order to maintain the total of 5,571 new units with 3,398 located in PDA's, the non-PDA new housing units for the unincorporated area should be approximately 2,173 units.

We will need additional time to comment on the distribution of housing units outside of PDA's as we do not have the corresponding mapping information for the "All Areas" sheet. We believe that new unit and household growth is anticipated to be low in the County's Coastal-Gualala area which has a very high vacancy rate due to a high percentage of second homes and vacation rentals in this area, and a very low growth rate due to lack of public services and large minimum parcel sizes with little subdivision potential. We have no reason to believe that vacancy rates in this area will significantly decrease, the trend over the last decade is an increasing use of the housing stock for vacation rentals or second homes.

It also appears that the housing distribution provided in the ABAG GIS data for Traffic Analysis Zones, may not correlate well with the data provided in the JHC Housing Distribution Detail Workbook, 3/12. Based on a preliminary review of the GIS data in map form, it appears there is too much growth projected in the very large TAZ encompassing the northwestern part of Sonoma County, including the Coastal Zone.

It is our understanding that new housing units within City Urban Growth Boundaries, even if not now annexed to the City, are allocated in the future to that City's 2010-2040 new housing unit count. For example, there are large islands of unincorporated area within the City of Santa Rosa's Urban Growth Boundary. Projected new housing units in these "County islands" should appear as new housing units for the City of Santa Rosa. Please confirm that this methodology was used consistently with all the Cities.

3. **Jobs.** Our review has focused on the ABAG JHC Employment Distribution Detail Workbook, 3/12. A general comparison of the total Countywide 2010 jobs base was made with the Census LEHD On The Map report. The total 2010 base jobs numbers appear to be within an acceptable range.

The ABAG JHC Employment Distribution Workbook does not appear to have internal inconsistencies between different sheets of the workbook as was noted for the Housing Distribution workbook.

The jobs projected between 2010 to 2040 for all of Sonoma County are:

Table: New Jobs Unincorporated Sonoma County

	JHC Employment Distribution Detail Workbook, 3/12	
	Jurisdictions Sheet	SSA Areas Sheet
PDA's	9,010	
Non-PDA's	6,790	
Total	15,800	15,801

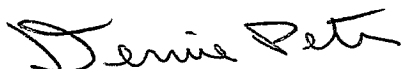
In general, we note that the unincorporated areas of Sonoma County which provide a strong agricultural jobs base for the wine industry include: Dry Creek Valley, Alexander Valley, Sonoma Valley, and the Russian River Valley. Sonoma County has over 300 wineries which provide thousands of jobs in the agricultural sector. There is also a strong recreation and visitor-serving commercial jobs base to serve

visitors to wine country. The "SSA Details" sheet of the ABAG JHD Employment Distribution Details Workbook shows a loss of 427 jobs in the ag sector between 2010 and 2040, and an existing 2010 ag jobs base of 5,391. The existing ag jobs base appears to be within an acceptable range, however, we don't feel there will be a loss of jobs in the County in the Ag Sector. We would like some additional time to assess this as well as the distribution of jobs in the "ArtRecOther" category.

It appears that the jobs distribution provided in the ABAG GIS data, distributed by Traffic Analysis Zone, may not correlate well with the data provided in the JHC Employment Distribution Detail Workbook, 3/12. Based on a preliminary review of the GIS data in map form, it appears there is too much job growth projected in the very large TAZ encompassing the northwestern part of Sonoma County, including the Coastal Zone, and an incorrect projection of job loss in the Dry Creek Valley area of the County which has one of the County's highest concentrations of wineries. We have no reason to believe that there will be a loss of jobs in that area. We would like to have corresponding GIS mapping data for all the geographies represented in the various table of data.

Thank you for the opportunity to comment. We look forward to further working with ABAG staff to clarify which data sets will be used for the final SCS scenario and RHNA, and further commenting on jobs and housing distribution with additional mapping detail.

Sincerely,



Denise Peter, AICP
Planner III

Attachments:

1. LEHD Census Report Sonoma County All Jobs 2010
2. 4/13/11 letter to Ken Kirkey re: Initial Vision Scenario Comments
3. 2/29/12 letter to Ken Kirkey re: Airport/Larkfield PDA



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May 3, 2012

Ms. Trudi Ryan
Planning Officer
City of Sunnyvale
P.O. Box 3707
Sunnyvale, CA 94087-3707

RE: Comments on Plan Bay Area

Dear Ms. Ryan:

Thank you for your correspondence dated April 20, 2012 to Justin Fried concerning the Plan Bay Area Jobs-Housing Scenario and Transportation Investment Strategy.

Your comments will be presented to ABAG and MTC board members. Since the inception of Plan Bay Area, we have received numerous letters such as yours with detailed and thoughtful comments. ABAG and MTC staffs will present recommendations on a Preferred Scenario at a joint MTC Planning and ABAG Administrative Committee meeting on May 11, 2012.

Both agencies will meet jointly again on May 17 to approve a final Preferred Scenario. This will provide the basis for a draft Sustainable Communities Strategy (SCS) which will undergo an environmental assessment through the remainder of the calendar year. The draft SCS will be released at the end of this year, with adoption of a final SCS slated for April 2013.

We appreciate your concerns and suggestions. The outcome of this major planning effort will be better thanks to your participation.

Sincerely,

Doug Kimsey
Planning Director
Metropolitan Transportation Commission

Kenneth Kirkey
Planning Director
Association of Bay Area Governments

**CITY OF SUNNYVALE**

DATE: April 20, 2012
TO: Justin Fried, Regional Planner, ABAG
FROM: Trudi Ryan, Planning Officer
SUBJECT: Comments on ABAG "Jobs Housing Connection Scenario" updated March 9, 2012

Thank you for the detailed information on ABAG's projections for growth in Jobs and Housing for the period 2010-2040. We are pleased to provide feedback on this detail to assure that Sunnyvale's planning efforts are appropriately conveyed in regional planning efforts. We are generally comfortable with the total employment and housing numbers for Sunnyvale and request only changes in the way those numbers are distributed to our PDAs. The City of Sunnyvale is currently working on an update to the Land Use and Transportation Element (LUTE) of the General Plan. We have evaluated the ABAG information in light of the Draft LUTE that was developed by the Horizon 2035 Committee, a citizen's advisory committee selected by the Sunnyvale City Council. The Draft LUTE recommends a slightly more growth than the current General Plan LUTE. The City of Sunnyvale City Council has taken no position on the draft LUTE.

Employment

ABAG estimates total 2010 employment in Sunnyvale as 74,610. This number is higher than the employment numbers represented by Sunnyvale Business License data (about 54,000). It is reasonable that the ABAG number is higher than our business license data because not all businesses require a business license (e.g. certain financial institutions and government agencies—including: federal, state, county, local and school districts) and not all businesses have obtained a license.

Based on business license information alone we believe the number of jobs in some of the PDA areas should be adjusted. The following table shows requested corrections to the data from the Excel spreadsheet "Jobs-Housing Connection Employment Distribution Details." No change to the total employment numbers is requested. Where the numbers are close we request no changes. These corrections are essentially the same numbers used in the PDA applications for these areas. The projections for 2040 are listed as "less than" as these are build-out numbers for the area; they should be adjusted for the appropriate growth rate.

Housing Units

ABAG estimates 2040 housing units as 74,430. Sunnyvale is comfortable with this number as it is fairly consistent with the draft LUTE build-out projection of 72,160 housing units. The total current and future housing unit figures appear reasonable for Sunnyvale. We do have a few requested adjustments to the spreadsheet "Jobs-Housing Connection Housing Distribution Details," shown in the table below.

City of Sunnyvale Jobs		
PDA Name	2010	2040
Sunnyvale: Lawrence Station Transit Village	4,160	5,380
Sunnyvale: Downtown & Caltrain Station	3,750	5,610
Sunnyvale: El Camino Real Corridor*	13,190 5,000	17,790 <7,500
Sunnyvale: Moffett Park	11,420 27,600	16,010 <50,000
Sunnyvale: Peery Park	5,980 10,400	8,880 <20,100
Sunnyvale: East Sunnyvale	8,050 11,300	9,290 <6,300
Sunnyvale: Reamwood	3,050	3,870
Sunnyvale: Tasman Crossing	1,540	2,400 900
SUB-TOTAL PDA Employment	51,140 66,800	69,230 <102,060
NON-PDA Employment	23,470 7,810	25,620 <???
TOTAL Sunnyvale Employment	74,610	94,850

**Note: El Camino Real is a commercial corridor through Sunnyvale. Commercially zoned, planned and developed properties are one parcel deep on both sides of El Camino Real. Adjacent properties are planned, zoned and developed with residential uses. El Camino Real has a few properties zoned for residential use only and permits mixed use in other areas, primarily the nodes. While the VTA described corridor for El Camino Real indicates a half-mile wide corridor (quarter mile on both sides) with the opportunity for mixed-use area, it is only the area that fronts on El Camino Real that will have commercial and/or mixed uses. The other established residential areas are not likely to change from their primarily single-family character.*

City of Sunnyvale Housing Units

PDA Name	HU 2010	HU 2040
Lawrence Station Transit Village	1,657	4,166
Downtown & Caltrain Station	1,835	3,795
	10,993	15,384
El Camino Real Corridor*	9,806	12,506
	15	15
Moffett Park	0	0
	125	125
Peery Park	0	0
East Sunnyvale ITR	1,019	4,270
		493
Reamwood Light Rail Station	0	338
	1,439	3,248
Tasman Station ITR	1,739	3,469
SUB-TOTAL PDA Housing Units	14,414	31,497
	16,056	28,544
NON-PDA Housing Units	39,316	42,933
	37,674	45,886
TOTAL Sunnyvale Housing Units	53,730	74,430

*Note: See note to above table

Again, thank you for accepting our requests for modifications to your data tables.

Please contact me if you have any questions,

Trudi Ryan, Planning Officer
City of Sunnyvale
P.O. Box 3707
Sunnyvale, CA 94087-3707

tryan@ci.sunnyvale.ca.us
408-730-7435



METROPOLITAN
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Phone: 510.464.7900
E-mail: info@abag.ca.gov

May 2, 2012

Ms. Valerie Barone
Interim City Manager
City of Concord
1950 Parkside Drive, MS/01
Concord, CA 94519-2578

RE: Comments on Plan Bay Area

Dear Ms. Barone:

Thank you for your correspondence dated 4/24/2012 to our agencies concerning the Plan Bay Area Jobs-Housing Scenario and Transportation Investment Strategy.

Your comments will be presented to ABAG and MTC board members. Since the inception of Plan Bay Area, we have received numerous letters such as yours with detailed and thoughtful comments. ABAG and MTC staffs will present recommendations on a Preferred Scenario at a joint MTC Planning and ABAG Administrative Committee meeting on May 11, 2012.

Both agencies will meet jointly again on May 17 to approve a final Preferred Scenario. This will provide the basis for a draft Sustainable Communities Strategy (SCS) which will undergo an environmental assessment through the remainder of the calendar year. The draft SCS will be released at the end of this year, with adoption of a final SCS slated for April 2013.

We appreciate your concerns and suggestions. The outcome of this major planning effort will be better thanks to your participation.

Sincerely,

A handwritten signature in black ink, appearing to read 'Doug Kimsey'.

Doug Kimsey
Planning Director
Metropolitan Transportation Commission

A handwritten signature in black ink, appearing to read 'Kenneth Kirkey'.

Kenneth Kirkey
Planning Director
Association of Bay Area Governments

CITY OF CONCORD
1950 Parkside Drive, MS/01
Concord, California 94519-2578
FAX: (925) 798-0636

OFFICE OF THE MAYOR
Telephone: (925) 671-3158



CITY COUNCIL
Ronald E. Leone, Mayor
William D. Shinn, Vice Mayor
Timothy S. Grayson
Daniel C. Helix
Laura M. Hoffmeister

#42

Thomas J. Wentling, City Treasurer
Valerie Barone, Interim City Manager

April 24, 2012

RECEIVED

APR 30 2012

MTC

Ms. Adrienne J. Tissier, Chair
Metropolitan Transportation Commission
Joseph P. Bort Metro Center
101 Eight Street
Oakland, CA 94607-4770

Mr. Mark Luce, President
Association of Bay Area Governments
Joseph P. Bort Metro Center
PO Box 2050
Oakland, CA 94607-4756

SUBJECT: Comments on the Sustainable Communities Strategy Jobs-Housing Connection Scenario

Dear Ms. Tissier and Mr. Luce:

The city of Concord appreciates the opportunity to submit comments on the Sustainable Communities Strategy Jobs-Housing Connection Scenario. We also appreciate ABAG's and MTC's ongoing efforts to develop a strategy, which will enable our region to comply with SB 375. Unfortunately, our primary comments on this most recent scenario are very similar in nature to those we submitted to Paul Fassinger, ABAG Research Director, on May 6, 2011 in response to the Initial Vision Scenario: None of the land use scenarios developed since May 2011 accurately reflect the planning activities for the 5,000 acre Concord Reuse Project Area.

On January 24, 2012, the Concord City Council adopted Resolution 12-4823.2 amending the *Concord 2030 Urban Area General Plan* to achieve consistency between the General Plan and *Concord Reuse Project Area Plan* and adopting the *Concord Reuse Project Area Plan* as part of the General Plan. With this action, the growth projections for 2030 have been revised per the following table:

	Existing	2030 (per 2007 GP)	Additional from CRP Area	2030 REVISED
Population	124,440 ¹	142,210	28,800	171,010
Housing Units	46,290	53,220	12,270	65,490
Jobs	60,890	88,800	26,530	115,330

¹ US Census, 2000

As approved, the Concord Reuse Project Area Plan concentrates the most intense employment areas and highest-density housing around the North Concord/Martinez BART station, including 3.8 million square feet of office space. It combines office, housing,

shopping, dining and entertainment, and open spaces in a pattern that encourages BART ridership, walking, and biking and that reduces the need for driving. The Concord Reuse Project will be a "green development" that provides a home for "green jobs." Green building and infrastructure technologies will be used during construction by trained workers to make buildings for emerging green industries. Workplaces will be designed to encourage walking, bicycling, and transit use, and the community itself will include a mix of jobs and housing at all affordability levels to minimize commute lengths and driving time.

The *Concord Reuse Project Area Plan* is a model for the type of development proposed by the Job-Housing Connection Scenario, and it addresses the types of employment discussed in the Scenario as most likely to see measurable growth during the planning period. There are some infrastructure challenges that will likely result in the majority of new development occurring in the later years of the planning period. However, there are portions of the project area with existing infrastructure and access to BART that, in combination with completed planning and environmental review, will be highly desirable for knowledge-based employers.

We strongly urge you to reconsider the 2040 employment projection for the City of Concord of only 67,980 Jobs shown in the Jobs-Housing Connection Scenario and take into account the thoughtful and extensive deliberation that resulted in a projection of 115,330 jobs (26,530 from the Concord Reuse Project Area) in the recent amendment to the *Concord 2030 General Plan*. Failure to acknowledge this level of employment growth could result in the lack of sufficient resources available to assist in provision of the associated necessary infrastructure. It also creates conflicts and undermines the strategies proposed in the *Concord Reuse Project Area Plan* for achieving reductions in vehicle miles traveled and greenhouse gases.

We thank you again for the opportunity to comment on the Jobs-Housing Connection Sustainable Communities Strategy, with the expectation that these concerns will be addressed as we move forward in this process. If you have any immediate questions regarding these comments, please contact Carol Johnson at (925) 671-3369 or Michael Wright at (925) 671-3019.

Very truly yours,



Valerie J. Barone

Interim City Manager

City of Concord

Cc: Mayor and members of the City Council
Members of the Planning Commission
Sailaja Kurella, ABAG Regional Planner
Victoria Walker, Community & Economic Development Director
Michael Wright, Director of Community Reuse Planning
Carol Johnson, Planning Manager



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Phone: 510.464.7900
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May 3, 2012

Mr. Brian Dolan
Director of Community Development
City of Pleasanton
P.O. Box 520
Pleasanton, CA 94566-0802

RE: Comments on Plan Bay Area

Dear Mr. Dolan:

Thank you for your correspondence dated April 24, 2012, to Athena Ullah concerning the Plan Bay Area Jobs-Housing Connection Scenario and Transportation Investment Strategy.

Your comments will be presented to ABAG and MTC board members. Since the inception of Plan Bay Area, we have received numerous letters such as yours with detailed and thoughtful comments. ABAG and MTC staffs will present recommendations on a Preferred Scenario at a joint MTC Planning and ABAG Administrative Committee meeting on May 11, 2012.

Both agencies will meet jointly again on May 17 to approve a final Preferred Scenario. This will provide the basis for a draft Sustainable Communities Strategy (SCS) which will undergo an environmental assessment through the remainder of the calendar year. The draft SCS will be released at the end of this year, with adoption of a final SCS slated for April 2013.

We appreciate your concerns and suggestions. The outcome of this major planning effort will be better thanks to your participation.

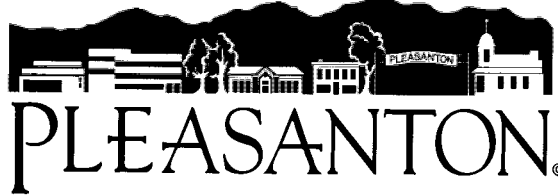
Sincerely,

A handwritten signature in black ink, appearing to read 'Doug Kimsey'.

Doug Kimsey
Planning Director
Metropolitan Transportation Commission

A handwritten signature in black ink, appearing to read 'Kenneth Kirkey'.

Kenneth Kirkey
Planning Director
Association of Bay Area Governments



April 24, 2012

Athena Ullah
Regional Planner
Association of Bay Area Governments
101 Eighth Street
Oakland, CA 94607

RE: Comments on ABAG's and MTC's March 9, 2012 SCS Preferred Jobs-Housing Connection Scenario

Dear Ms. Ullah:

Thank you for providing the City of Pleasanton with the opportunity to comment on the Draft Jobs-Housing Connection Scenario for ABAG's and MTC's preferred Sustainable Communities Strategy (SCS) scenario released March 9, 2012. This is a proposal which identifies ABAG's and MTC's more refined vision of where and how much growth is anticipated in the Bay Area between the years 2010 and 2040.

The report shows 26,050 existing housing units in the City of Pleasanton in 2010. The report proposes the City of Pleasanton provide sufficiently zoned land to accommodate 5,660 more housing units between 2010-2040. The report also provides that the City of Pleasanton will gain 17,610 jobs between 2010-2040. City staff does not have major concerns with the proposed housing unit and employment growth for the City of Pleasanton within the 2010-2040 timeframe.

However, the relationship of these numbers to the preliminary RHNA number described below is confusing and troubling. In its March 15, 2012 Executive Board agenda packet, ABAG released its preliminary draft RHNA numbers for the 2014-2022 RHNA cycle. Given that the SCS and RHNA are required to be consistent under State law, the information released is somewhat confusing when compared with the March 9, 2012 Draft Jobs-Housing Connection Scenario numbers for the SCS and its assumptions between 2010-2040. The SCS analysis has a base year of 2010 and includes assumptions about existing housing unit numbers and units planned from year 2010+. Given that Pleasanton has accommodated all of its 2007-2014 RHNA allocation between 2010-2014, the preliminary number of units to be allocated within the next RHNA cycle between 2014-2022 seems remarkably high (with over 80% of the draft SCS unit total in Pleasanton to be accommodated by 2022), especially given that the next RHNA cycle is only for 8 years and there will still be another 28 years within the SCS timeframe thereafter. Staff requests that the RHNA methodology take housing units to be accommodated between 2010-2014 into better consideration and the remaining housing unit allocation be more evenly distributed between the next 3 RHNA cycles within the SCS timeframe. An allocation which is more evenly spread will allow for better planning—including infrastructure, funding, location, and design planning.

COMMUNITY DEVELOPMENT

P. O. BOX 520, Pleasanton, CA 94566-0802

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If you have any questions about this letter, please do not hesitate to contact me. Thank you again for the opportunity to comment.

Sincerely,

A handwritten signature in black ink, appearing to read 'B. Dolan', with a long horizontal stroke extending to the right.

Brian Dolan
Director of Community Development
City of Pleasanton
p: (925) 931-5614
bdolan@cityofpleasantonca.gov

Plan BayArea

May 9, 2012

6 Wins Organizations
[See Distribution List]

RE: Response to Letter Dated April 25, 2012 re: Recommendations for Realizing the Promise of Plan Bay Area

Dear 6 Wins Representatives:

Thank you for your involvement in the Plan Bay Area process and for your letter of April 25, 2012 which includes your recommendations on how to integrate the Three Es of economy, environment, and equity principles into Plan Bay Area. Below are our responses to your five recommendations as outlined in Attachment A to your letter.

1. Plan for affordable housing in all high-opportunity areas, including PDAs and “PDA-like” places via the SCS and RHNA.

- The Regional Housing Needs Allocation (RHNA) process that is administered by ABAG directly addresses how each Bay Area community meets their projected share of the region’s projected housing needs, including the provision of affordable housing. Each jurisdiction will receive their allocated total number of housing units that it must plan for within the eight year time period through the General Plan Housing Elements. Allocations are distributed within four economic income categories; these four categories must add up to the total overall number a jurisdiction is allocated. RHNA is state mandated planning process, and we look to the RHNA to allocate the region’s housing need over the next 8-years.
- Per SB 375, ABAG did take into account the state’s housing goal when preparing the Draft Jobs-Housing Connection Scenario, and as such, has placed 82 percent of new housing and 67 percent of new jobs into Priority Development Areas (PDAs). For more information, see the links below:

Preferred Land Use Scenario/Transportation Investment Strategy:
http://apps.mtc.ca.gov/meeting_packet_documents/agenda_1875/Item_4a_PREFERRED_Land_Use_Scenario_Transp_Invest_Strategy.pdf

2. Restore local transit to a reasonable baseline of service.

- The Draft Transportation Investment Strategy directs nearly \$150 billion through the Fix-It-First strategy to transit maintenance and operations, including lifeline transportation services to support low-income residents. These investments will maintain existing transit service levels and replace critical transit capital assets required to maintain service reliability as well as improve mobility and accessibility of low-income residents, particularly those living in communities of concern, through a variety of strategies as identified in community-based transportation plans.
- Staff believes it is inappropriate to seek the restoration of transit service to 2009 levels, without serious consideration of the productivity of those services. The Transit Sustainability Project sets forth a more comprehensive and deliberate approach. Transit agency board reports prepared at the time of service adjustments in 2008/2009 also support using a policy basis for service changes. To that end, the following recommendations from the Transit Sustainability Project are included in the Draft Transportation Investment Strategy:
 - Require large transit operators to achieve a 5% reduction in cost metrics within 5 years – savings could be re-invested in additional productive service or to ensure that existing services are maintained; and
 - Invest \$500 million in service improvements proposed for the new Transit Performance Initiative to improve customer travel times and attract new riders – focusing on highest ridership corridors.
- A commitment of an additional \$70 million to transit service annually (or \$2.7 billion over Plan Bay Area) would require unfunding other investment strategies (e.g. Climate, high performing projects, OneBayArea Grant, transit rehabilitation), or require transit operators to further increase their operating efficiency in order to redirect funding to increased service levels.
- For more information, see the link below:

Preferred Land Use Scenario/Transportation Investment Strategy:

[http://apps.mtc.ca.gov/meeting_packet_documents/agenda_1875/Item_4a Preferred Land Use Scenario Transp. Invest. Strategy.pdf](http://apps.mtc.ca.gov/meeting_packet_documents/agenda_1875/Item_4a_PREFERRED_Land_Use_Scenario_Transp._Invest._Strategy.pdf)

3. Make investments and planning decisions that equalize health outcomes across incomes and races.

- The equity analysis technical documentation for the Preferred Jobs-Housing Connection/Transportation Investment Strategy is found at the following link:

Preferred Scenario Equity Analysis Methodology

[http://www.onebayarea.org/pdf/Appendices_5-4-](http://www.onebayarea.org/pdf/Appendices_5-4-12/Appendix_F_Equity_Analysis_Methodolgy_Prefered_Scenario.pdf)

[12/Appendix_F_Equity_Analysis_Methodolgy_Prefered_Scenario.pdf](http://www.onebayarea.org/pdf/Appendices_5-4-12/Appendix_F_Equity_Analysis_Methodolgy_Prefered_Scenario.pdf)

- The Commission/ABAG Executive Board is scheduled to review and approve the proposed Preferred Scenario on May 17, 2012. Following this action, MTC staff will prepare an Equity Analysis of the Draft Plan (the approved preferred scenario will become the Draft Plan) to determine how a set of measures (such as housing and transportation affordability, displacement risk, vehicle miles traveled density, non-commute travel time, and commute time) performs over the long-range horizon of the plan. The analysis will provide comparisons between the base year and the forecast year. However, analysis of the specific impacts of the investment strategy requires the development of a future-year "No Project" alternative to compare the Draft Plan against. The EIR for Plan Bay Area will identify a No Project alternative. This equity analysis, which is a separate technical document from the EIR, will evaluate the equity impacts of the Draft Plan when compared to the No Project alternative. The Draft Plan and Draft EIR, along with the equity analysis, will be released in December 2012.
- Monitoring of Plan outcomes going forward will incorporate both MTC's and ABAG's past work developing regional monitoring tools, including MTC's Snapshot Analysis and the SCS Indicators, both of which were developed in close collaboration with the Equity Working Group and other stakeholders.

4. Ensure the OneBayArea Grant program rewards local governments that promote affordable housing and protect against displacement.

- The proposed OneBayArea (OBAG) grant includes several policy elements for the current funding cycle intended to reward local governments and promote affordable housing and protect against displacement. Specifically, 25% of the OBAG funding distribution formula is based on low-income housing (RHNA and past housing production). ABAG and MTC have provided data to show how jurisdictions' low-income housing have generated the fund distribution to the county. CMAs are to prepare a PDA Investment & Growth Strategy to guide a transportation project priority-setting process for OBAG funding that supports and encourages development in the region's PDAs. MTC will report on the outcome of the project selection process in late 2013.
- The proposal for the PDA Investment & Growth Strategy specifies the following:

Starting in January 2014 and for subsequent updates, PDA Investment & Growth Strategies will assess performance in producing sufficient housing for all income levels through the RHNA process and, where appropriate, assist local jurisdictions in implementing local policy changes to facilitate achieving these

goals. The locally crafted policies should be targeted to the specific circumstances of each PDA. For example, if the PDA currently does not provide for a mix of income-levels, any recommended policy changes should be aimed at promoting affordable housing. If the PDA currently is mostly low-income housing, any needed policy changes should be aimed at community stabilization. This analysis will be coordinated with related work conducted through the Housing and Urban Development (HUD) grant awarded to the region in fall 2011.

- The proposed OneBayArea Grant program also sets forth expectations for the FY2015-16 funding cycle and proposes to link the release of future cycle funding (subsequent to FY 2015-16) to the implementation of affordable housing policies around which local officials reach consensus. Per the OBAG proposal, jurisdictions would be required to adopt housing elements by October 31, 2014 (based on an April 2013 SCS adoption date) in time to be eligible for funding for the FY 2015-16 funding cycle.
- For more information, see the link below:

Final Cycle 2 OneBayArea Grant Program

http://apps.mtc.ca.gov/meeting_packet_documents/agenda_1875/Item_4b_OBAG.pdf

5. Study the Equity, Environment, and Jobs (EEJ) Scenario as an alternative in the upcoming environmental impact review (EIR) process.

- ABAG and MTC staffs have evaluated the Equity, Environment, and Jobs (EEJ) Scenario as part of the Round 2 scenario analysis. As you noted, on July 21, 2011, the ABAG Executive Board approved modification to the Focused Growth Scenario to reflect the land use elements from the EEJ Scenario. On July 27, 2011, the Commission approved modification to the Core Capacity Transit Network to reflect the transit elements from the EEJ Scenario. Following these board actions, ABAG and MTC staff held two special stakeholder meetings on August 16, 2011 and August 31, 2011 to discuss, review, and solicit feedback on the land use and transportation network assumptions for the scenarios. Based upon stakeholder feedback, ABAG and MTC proceeded with the evaluation of the five scenarios, including the modified Focused Growth Scenario, and presented scenario results to the joint MTC Planning/ABAG Administrative Committees on December 6, 2011. For more information, see the links provided below:

Round 2 Scenario Results

http://apps.mtc.ca.gov/meeting_packet_documents/agenda_1779/Dec_2011_Planning_Committee_Presentation.pdf

Predicted Traveler Responses to Second Round Scenarios

http://www.onebayarea.org/pdf/2012_01_05_RELEASE_Second_Round_Travel_Model_Technical_Summary.pdf

Transportation Networks To Be Tested

http://www.onebayarea.org/pdf/Transportation_Networks.pdf

Equity Analysis Summary

<http://www.onebayarea.org/pdf/EquityAnalysisOverview.pdf>

Detailed Methodology Summary Memo

http://apps.mtc.ca.gov/meeting_packet_documents/agenda_1780/6_Methodology_Summary_Memo_1201.pdf

Proposed Refinements for Preferred Scenario

http://apps.mtc.ca.gov/meeting_packet_documents/agenda_1840/March_Equity_Working_Group_Packet.pdf

- Attachment A to this letter describes the methodology for developing the land use element of the modified Focused Growth Scenario.
- Attachment B to this letter describes the methodology for developing the land use element of the preferred Jobs-Housing Connection Scenario.

Sincerely,



Steve Heminger
Executive Director
Metropolitan Transportation Commission



Pat Jones
Assistant Executive Director
Association of Bay Area Governments

Distribution List

Kit Vaq & Alberta Maged, ACCE Riders for Transit Justice
Roger Kim, Asian Pacific Environmental Network
Wafaa Aborashed, Bay Area Healthy 880 Communities
Kirsten Schwind, Bay Localize
Carl Anthony & Paloma Pavel, Breakthrough Communities
Wendy Alfsen, California WALKS
Dawn Phillips, Causa Justa Just Cause
Nile Malloy, Communities for a Better Environment
Adam Kruggel, Contra Costa Interfaith Supporting Community Organization
Fernando Marti, Council of Community Housing Organizations
Ditching Dirty Diesel Collaborative
Aime Fishman, East Bay Housing Organizations
Mahasin Abdul Salaam & Michele Jordan, Genesis
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John Young, Marin Grassroots Leadership Network
Myesha Williams, New Voices are Rising Project
Richard Marcantonio, Public Advocates
Azibuike Akaba, Regional Asthma Management and Prevention
Jill Ratner, Rose Foundation for Communities and the Environment
Carol Johnson, St. Mary's Center
David Schonbrunn, Transportation Solutions Defense and Education Funding
Amy Petre Hill, Unitarian Universalist Legislative Ministry of California
Connie Galambos Malloy, Urban Habitat

Attachment A

Land Use Methodology for Modified Focus Growth Scenario

ABAG has incorporated input from the Equity Working Group and a variety of equity stakeholders into the three Alternative Scenarios (Core, Focused and Outward Growth) as well as the Draft Jobs-Housing Connection Scenario. This included an assessment of employment growth and low-income in-commute. The Focused Growth scenario first established a base level of housing growth for each jurisdiction based on existing transit service coverage and frequency, 2010 level of employment, 2010 level of net low-income in-commuting, and a minimum housing threshold based on expected level of household formation to ensure that transit- and job-rich cities would be providing enough housing to meet a minimum level of natural growth and meet the housing needs of their workers. Growth for PDAs was then established based on similar factors: level of transit service, level of jobs, and PDA Place Type, such that more growth was directed to the more transit- and job-focused (>10,000 jobs) regional center, suburban center, city center, and mixed-use corridor PDAs.

The transit and employment factors used to establish the base level of growth for each jurisdiction and to distribute growth to each PDA directs more housing to job-rich places that are PDAs and PDA-like areas. The Focused Growth distribution also takes into account each jurisdiction's planned level of growth (identified via local PDA plans, and local feedback on previous SCS scenarios and past regional projections) to ensure that the level of growth directed to each place is feasible in terms of local plans and aspirations for growth. ABAG analyzes employment occupations and wages to determine the income distribution of the future population and to identify the housing needs by affordability level. The regional Equity Analysis, particularly the analysis of share of income spent on housing and risk of displacement, as well as ABAG's assessment of expected production of multifamily housing, helps us to further understand regional housing needs.

RHNA is essential to addressing housing affordability in the region. RHNA defines the local planning and regulation required to support the production of affordable housing. RHNA for the 2014-2022 planning period has been linked to the SCS housing distribution. In this way, the eight year housing need is tied to a 30-year housing distribution that takes into account sustainable, transit-served, and employment-rich locations for growth, including both PDA and non-PDA areas. The RHNA methodology further links housing need for each jurisdiction's non-PDA areas to employment and transit, and takes into account past RHNA performance (assigning more housing to poor performers). Finally, the RHNA methodology includes a fair share component based on expected level of household formation to ensure each jurisdiction plans for a minimum level of growth to meet the needs of its future population, as well as an income allocation component, which assigns units by income category, to address concentrations of poverty (shifting units in each income category by 175% for each jurisdiction).

Attachment B
Land Use Methodology for Preferred Jobs-Housing Connection Scenario

Housing growth in the Preferred Jobs-Housing Connection Strategy is distributed based on level of transit service and vehicle miles traveled per household, with the goal of directing more growth to places with a high level of existing and expected future transit infrastructure is expected to result in greater emissions reductions. For example, PDAs along the BART and Caltrain corridors, like Sunnyvale Lawrence Station, are identified as having Tier 1 transit, while PDAs like the San Pablo Avenue Corridor in San Pablo, are identified as having Tier 2 transit. PDA-like places, such as Novato and Larkspur, which have existing ferry service and are expected to have future SMART service, have also been identified by level of transit service (Tier 2 for each of these cases). The distribution is also based on each area's planned level of growth and development potential (identified via local specific plans, local feedback, and general plan zoning and land use data), to take into account local aspirations for growth. Furthermore, similar to the Alternative Scenarios, growth in each place was adjusted based on several factors, including expected level of employment in 2040 and level of net low-income in-commuters, among others. Taken together, these housing distribution factors direct growth to job-rich cities that are both PDA and PDA-like areas, as well as ensure that the level of growth directed to each place is feasible in terms of local plans and development potential.

April 25, 2012

BY ELECTRONIC MAIL

Adrienne Tissier, Chair, and Members
Metropolitan Transportation Commission

Mark Luce, President/Chair, and Members
ABAG Executive Board and Administrative Committee

Re: Recommendations for Realizing the Promise of Plan Bay Area

Dear Chairs, Commissioners, and Members:

The undersigned organizations represent economic justice, public health, housing, environmental justice, transportation, faith, and environmental interests.¹ Like you, we believe in the value of regional planning. When designed fairly to meet the needs of *all* residents, regional planning holds great promise for a healthier, more economically prosperous, and socially equitable Bay Area.

We commend you for the steps you have taken to improve the planning process — for example, agreeing to analyze the equity impacts of alternative scenarios before selecting a preferred scenario and to measure the performance of proposed projects before making investment decisions. However, as adoption of the Plan Bay Area² preferred scenario draws near, it does not appear that these analyses are adequately informing the plan. **We urge you to take the critical steps necessary (detailed below and in *Attachment A*)** to devise a plan that meets the environmental, economic and equity goals — the “three E’s” — that are vital to the region’s future.

So far, Plan Bay Area has fallen short on each of the three E’s. According to MTC and ABAG’s own analyses, each of the alternative scenarios studied fails to meet greenhouse gas (GHG) reduction goals, exacerbates inequity and burdens on low-income households, and under-performs economically. As many of you have noted in recent meetings, under each of MTC/ABAG’s alternative scenarios:

- The Bay Area will reduce GHG emissions by only 8–9%, falling well short of the Bay Area’s 15% target under SB 375.³ Even this level of GHG reduction was premised on a scenario that increased transit service around PDAs, which staff estimates would add \$52.8 billion in operating expense to the RTP’s price tag.

¹ Many of the undersigned are affiliated with the 6 Wins for Social Equity Network. The 6 Wins Network is a group of more than 30 economic justice, faith, public health, and environmental organizations. More information available at:

http://www.publicadvocates.org/sites/default/files/library/6_wins_network_brochure.pdf.

² Bay Area agencies’ joint efforts to integrate transportation and land use planning by developing a coordinated Regional Transportation Plan (RTP) and Sustainable Communities Strategy (SCS).

³ *Plan Bay Area Scenario Analysis/Targets Scorecard*, December 2011, available at: <http://onebayarea.org/pdf/ScenarioAnalysisOverview.pdf>.

- By 2040, low-income households will be paying a staggering 84% or more of their family budgets on housing and transportation costs alone.⁴
- The lack of adequate workforce housing will also hurt the economy, reducing potential job-growth by more than 10% over the next 28 years.⁵
- 30–40% of residents in low-income communities of color, most of which are Priority Development Areas, will be at a high risk of being displaced from their communities.⁶ This flies in the face of one of the important Plan Bay Area performance targets you adopted, which states that the SCS will “House 100% of the region’s projected 25-year growth by income level (very-low, low, moderate, above-moderate) *without displacing current low-income residents.*” (emphasis added)⁷

These are not the marks of an economically healthy or equitable plan, nor are they the marks of a plan that will protect the climate.

Today, more than ever, the Bay Area needs a plan that will achieve the three E’s. Facing historic budget deficits, nearly every single bus operator has cut service and raised fares since adoption of the last RTP, reducing transit affordability, reliability, and in some cases eliminating bus lines altogether. These slashes in services go beyond mere “strategic” or “surgical” cuts – they are leaving entire communities stranded, unable to rely on transit to get their basic needs met. (For more detail on the service cuts, see *Attachment C*). At the same time, homes in both urban and suburban areas that have good access to jobs, such as San Francisco, Silicon Valley, Oakland, and the Tri-Valley, are increasingly unaffordable for people with an average household income. Working families face an impossible choice: live close to work in overcrowded or unsafe conditions, or struggle through a long and expensive commute to live in a more affordable home far away. Plan Bay Area is an opportunity to address these troubling conditions head-on by prioritizing the funding of local transit service and affordable housing near transit and jobs. While the title of the latest plan — “The Jobs-Housing Connection Scenario” — recognizes this important goal, the policies and investments it contains are unlikely to accomplish it.

Under your leadership, our region can and must do better. Because we share your belief in the promise of regional planning, our organizations have worked to actively and constructively participate in every phase of the Plan Bay Area process over the past 18 months. **Our core recommendations have remained simple and consistent:**

- Incorporate the Equity, Environment, and Jobs (EEJ) Scenario into Plan Bay Area, including these key elements:

⁴ *Plan Bay Area Equity Analysis Overview*, December 2011, available at: <http://onebayarea.org/pdf/EquityAnalysisOverview.pdf>.

⁵ *Jobs-Housing Connection*, March 2012, p.8, available at: http://onebayarea.org/pdf/SCS_Prefered_Scenario_Jobs_Housing_Connection_3-9-12.pdf; *Bay Area Job Growth to 2040*, Center for Continuing Study of the California Economy, February 2012, p. 17, available at: http://onebayarea.org/pdf/3-9-12/CCSCE_Bay_Area_Job_Growth_to_2040.pdf.

⁶ *Plan Bay Area Equity Analysis Overview*, December 2011, available at: <http://onebayarea.org/pdf/EquityAnalysisOverview.pdf>.

⁷ *Adopted Performance Targets for the 2013 SCS/RTP*, January 2011, p.4, available at: http://apps.mtc.ca.gov/meeting_packet_documents/agenda_1599/Revised_-_tmp-3987.pdf.

- More frequent and affordable local transit service — by restoring transit service cuts, especially those affecting Communities of Concern, and by maximizing funding for local transit operations; and
- More affordable housing in *all* job-rich communities so that everyone has the opportunity to live, play and go to school in the community where they work.
- Adopt a One Bay Area Grant (OBAG) program that rewards local efforts to promote affordable housing development and protect against displacement.
- Make investment and planning decisions that equalize health outcomes across incomes and races. Measure public health impacts at a neighborhood level and monitor real-time conditions, like air quality, noise/vibration impacts, asthma rates, and traffic injuries, on an ongoing basis.

We have tailored these proposals to the triple bottom line of helping the region achieve its GHG reduction targets in a manner that enhances its economic competitiveness and benefits all residents of the region fairly. Not only are these proposals strongly supported by a range of stakeholders, including city staff, public health officials, environmentalists, and transit providers, many of you as elected officials have endorsed them as well.

Despite that broad support, as the adoption of the RTP and SCS quickly approaches, we are deeply concerned that our efforts at productive engagement are not affecting the plans. While many of our proposals have received strong, or even unanimous, support from elected decision-makers and community stakeholders, they do not appear to have shaped the most recent drafts of the “Jobs-Housing Connection” Land Use Scenario, the Transportation Investment Strategy, or the OBAG program. By failing to reflect the explicit direction that your boards and committees have given executive staff over the past year and by neglecting to respond to the disproportionate impacts revealed in the Alternative Scenarios Equity Analysis, the latest Plan Bay Area drafts do not yet fulfill the promise of a stronger, healthier region.

But it is not too late. Critical decisions lie before you and you still have the opportunity to make the right choice: Will you and staff seize this opportunity to adopt a visionary plan for *One* Bay Area — equal in opportunity and healthy for all — or will we continue as *many* Bay Areas, segregated by unequal incomes, unequal access to transit and housing options, and subjected to unequal environmental and health burdens?

To advance as *One* Bay Area, you must step in **now** to correct the course of Plan Bay Area. Otherwise, the region will continue on the troubling path of business as usual and fall short of the promise of a stronger Bay Area for all its residents. Disregarding public input, especially from underprivileged communities, could also send the dangerous message that MTC and ABAG discourage public participation.

We urge you and staff to take action on the core recommendations (see above) we have constructively and consistently provided throughout this process. *Attachment A* lists the concrete steps you and staff can still take to ensure that Plan Bay Area advances a healthier, more economically prosperous, environmentally sustainable, and socially equitable Bay Area for generations to come. *Attachment B* recaps some of the key

proposals we have offered over the last several months, as well as the fates of those proposals up until this point. *Attachment C* provides additional detail about recent transit service cuts and our recommendations for restoration of that service.

We look forward to hearing from you and staff as you make key decisions in the coming days.

Sincerely,

Kit Vaq & Alberta Maged, Co-Chairs
ACCE Riders for Transit Justice

Roger Kim, Executive Director
Asian Pacific Environmental Network

Wafaa Aborashed, Executive Director
Bay Area Healthy 880 Communities

Kirsten Schwind, Program Director
Bay Localize

Carl Anthony & Paloma Pavel, Co-Directors
Breakthrough Communities

Wendy Alfsen, Executive Director
California WALKS

Dawn Phillips, Co-Director of Programs
Causa Justa :: Just Cause

Nile Malloy, Northern California Program Director
Communities for a Better Environment.

Adam Kruggel, Executive Director
Contra Costa Interfaith Supporting Community Organization (CCISCO)

Fernando Marti, Co-Director
Council of Community Housing Organizations (SF CCHO)

Ditching Dirty Diesel Collaborative

Amie Fishman, Executive Director
East Bay Housing Organizations (EBHO)

Mahasin Abdul Salaam & Michele Jordan, Transportation Task Force Co-Chairs
Genesis

Gladwyn d'Souza, Project Director
Green Youth Alliance

Joshua S. Hugg, Program Manager
Housing Leadership Council of San Mateo County

John Young, Executive Director
Marin Grassroots Leadership Network

Myesha Williams, Co-Director
New Voices are Rising Project

Janis Watkins, Transit Equity Neighborhood Development Task Force Chair
North Bay Organizing Project

Richard Marcantonio, Managing Attorney
Public Advocates

Azibuike Akaba, Policy Associate
Regional Asthma Management and Prevention (RAMP)

Jill Ratner, President
Rose Foundation for Communities and the Environment

Carol Johnson, Executive Director
St. Mary's Center

David Schonbrunn, President
Transportation Solutions Defense and Education Fund

Amy Petré Hill, Board Member
Unitarian Universalist Legislative Ministry of California

Connie Galambos Malloy, Senior Director of Programs
Urban Habitat

Cc: Steve Heminger, MTC Executive Director
 Ann Flemer, MTC Deputy Executive Director, Policy
 Ezra Rapport, ABAG Executive Director
 Ken Kirkey, ABAG Planning Director

ATTACHMENT A**Recommended Next Steps and Modifications to Draft Plan Bay Area Proposals**

The following proposals and modifications are consistent with those we have made throughout the Plan Bay Area process. They represent the region's best shot at advancing vital goals for the environment, the economy, and equity, and **there is still time to act on them.**

1. **Plan for affordable housing in *all* high-opportunity areas, including PDAs and “PDA-like” places via the SCS and RHNA.** High-opportunity places are job-rich and transit-connected, have good schools, and often have large numbers of low-income in-commuters, indicating that they lack the affordable workforce housing needed to meet environmental, economic, and equity goals. Review and make corrections to the SCS and RHNA housing projection numbers to:
 - A. Ensure all job-rich cities in all parts of the Bay Area are planning for enough affordable housing growth to accommodate their current and future workforce;
 - B. Ensure that all PDAs and PDA-like places are receiving sufficient housing growth to maximize use of the transit network, including regional transit lines which benefit from massive regional financial investment; and
 - C. Minimize the extent to which new housing growth is over-concentrated in communities of concern, as disproportionate development pressure is a leading cause of gentrification and displacement.
2. **Restore local transit to a reasonable baseline of service** by committing an additional \$70 million per year to restore bus service cuts made over the past five years (see more detailed information in *Attachment C*). To accomplish this, the RTP should:
 - A. Prioritize existing transit funding and other flexible funding sources for bus operations and maintenance *before* this funding is used for *new* capital projects or non-transit needs (with the exception of OBAG funding);
 - B. Grow the pie of funding by renegotiating interest rate swaps and seeking new equitable, not regressive, taxation structures for transit;
 - C. Prioritize Transit Performance Initiative funds for high demand bus corridors; and
 - D. Identify and commit future revenues to increase transit service in Communities of Concern (which highly overlap with Priority Development Areas).
3. **Make investment and planning decisions that equalize health outcomes across incomes and races.** To accomplish this, Plan Bay Area should:

- A. Measure public health impacts at a neighborhood level and monitor real-time conditions, like air quality, noise/vibration impacts, asthma rates and traffic injuries, on an ongoing basis.⁸
- B. Plan housing growth with consideration of public health concerns, especially concerns about air quality near high-volume transit corridors.

4. Ensure the One Bay Area Grant program rewards local governments that promote affordable housing and protect against displacement. We continue to believe that the FY 2012-13 distribution of OBAG funding should directly reward local jurisdictions and require affordable housing and/or anti-displacement policies to be in place *now* in all recipient jurisdictions. Even if you decide not to put such policies in place now, there are still some key modifications to the latest proposal necessary to advance the core goals of the OBAG program and set a path toward an even stronger OBAG for the FY 2015-16 funding cycle.

- A. MTC should establish *now* some core requirements for the FY 2015-16 distribution of OBAG money. This will set clear expectations for CMAs and jurisdictions so that they can tailor PDA Growth Strategies and other planning and legislative activities toward meeting these requirements. These include:
 - i) Distributing funding to reward *local* affordable housing production,
 - ii) Requiring local adoption of policies from a flexible, but clearly articulated, menu of housing and community stabilization policies that correspond to those to be studied and considered in the PDA Growth Strategies
- B. Use the PDA Growth Strategy as a targeted tool to guide and assist local jurisdictions and CMAs toward meeting these established criteria in time for the FY 2015-16 OBAG funding cycle.
- C. Clarify the priorities that should be considered by CMAs in distributing the current (FY 2012-13) cycle of OBAG funding.
- D. Set housing element adoption deadlines that conform more closely to state statutes:
 - i. Establish an earlier deadline for adoption of an HCD-approved housing element for the 2007–2014 period (the proposed deadline is *4 years* after the statutorily required adoption date of June 30, 2009),
 - ii. Require all OBAG recipients to timely adopt housing element updates for the 2014–2022 planning period, within 18 months of final SCS adoption.

⁸ On April 4, 2012, the Southern California Association of Governments (SCAG) Regional Council unanimously passed a motion directing SCAG staff to develop, track/monitor, and report outcomes of various health and equity performance measures to better understand health outcomes from implementation of the SCS. For additional resources, see California Department of Public Health, *Climate Action for Health: Integrating Public Health into Climate Action Planning*, February 2012, p. 39, available at: http://www.cdph.ca.gov/programs/CCDPHP/Documents/CAPS_and_Health_Published3-22-12.pdf. See also Human Impact Partners, *Elevating Health & Equity into the Sustainable Communities Strategy (SCS) Process*, August 2011, available at: <http://www.humanimpact.org/component/jdownloads/finish/16/132/0>.

5. **Study the Equity, Environment, and Jobs (EEJ) Scenario as an alternative in the upcoming environmental impact review (EIR) process.** If the EEJ Scenario proves to be the environmentally superior alternative, it should be incorporated into the final RTP/SCS.

ATTACHMENT B**Recent Key Proposals and Recommendations from the 6 Wins Network and Allies**

The following summarizes a selection of the key proposals we have offered over the last several months, as well as the fates of those proposals up until this point in the Plan Bay Area process.

1. Incorporate Principles of the Equity, Environment, and Jobs (EEJ) Scenario into Plan Bay Area

Last summer, dozens of groups and community members joined together to propose the study of an “Equity, Environment, and Jobs (EEJ) Scenario.”⁹ The EEJ Scenario was built around two common-sense ingredients: (a) a land use component focused on allocating adequate affordable housing to all job-rich, transit-connected cities, including “PDA-like places,” and (b) a transportation component that expands local transit service levels, restoring lost transit service and addressing gaps in the existing transit network affecting low-income communities and communities of color.

A majority of MTC Commissioners and a unanimous ABAG Executive Board voted to direct staff to study the EEJ Scenario and to report on how the other five alternative scenarios addressed the components of the proposed EEJ Scenario.¹⁰ The ABAG Executive Board specifically directed staff to modify the Focused Growth Scenario by “maximizing the regional transit network and reducing GHG emissions by providing convenient access to employment for people of all incomes by distributing total housing growth numbers to: a) job-rich cities that are PDAs and PDA-like; b) connected to the existing transit infrastructure; and c) lack the affordable housing needed to accommodate low-income in-commuters.”¹¹ MTC Commissioners ratified the Executive Board’s direction to staff and also approved staff’s proposed increase in transit service in the Core Capacity Transit Network. Commissioners also affirmed staff’s promise to provide the public with more detailed information about the Transit Network. In the months since those votes, however, staff proposals have failed to carry out your direction faithfully.

A. Land Use Scenario

Last month, ABAG staff released the draft preferred land use scenario, the “Jobs-Housing Connection.” This scenario’s outcomes do not comport with the land use proposal adopted by the ABAG Executive Board. Instead, staff incorporated some components of the Board’s direction into a complicated methodology that did not actually produce the results that the Executive Board asked for. Specifically, many job-rich, transit connected communities that failed to volunteer for sufficient

⁹6 Wins Equity, Environment, and Jobs Comment Letter, June 21, 2011, available at:

http://publicadvocates.org/sites/default/files/library/alternative_scenarios_letter_06_21_11_0.pdf.

¹⁰Letter from Ann Flemer and Ezra Rapport to MTC Planning Committee and ABAG Administrative Committee, July 1, 2011, available at:

http://apps.mtc.ca.gov/meeting_packet_documents/agenda_1694/2b_PBA_AlternativeScenarios.pdf.

¹¹Proposal to Modify the Focused Growth Scenario, as adopted by ABAG Executive Board on July 21, 2011, available at:

http://www.publicadvocates.org/sites/default/files/library/proposal_to_modify_the_focused_growth_scenario_adopted_on_07_21_11.pdf

housing growth are not being assigned enough new housing to accommodate their current and future low-income workforce needs. This means that thousands of low-income workers will be forced to commute long distances to work in communities that won't provide them with affordable housing. Longer commutes and more in-commuting workers mean more vehicle miles travelled and greater GHG emissions, undermining one of the main purposes of this planning process. This also burdens the economy by making labor less readily available and more expensive for employers.

B. Transportation Network

As of the date of this letter, MTC staff has not yet released a detailed draft of the transportation network, nor has it released the information we've requested about the assumed service levels and associated costs in years 5 and 28 of the RTP.¹² The just-released summary of the Transportation Investment Strategy, however, fails to provide meaningful details about how the network will maximize equity, how it will maximize ridership on our existing transit system, or how it will meet the needs of the riders who rely on transit the most. Given the fast-approaching date for your approval of a Preferred Scenario and the lack of transparency about the network MTC staff is considering, we are deeply concerned that neither you nor the affected public will have the opportunity to understand the plan or provide meaningful input on it. Achieving a triple bottom line means shifting available funds to operate more transit service; yet so far, staff has disclosed neither key details of the transit network they are planning, nor the costs of that network at years 5 and 28 of the RTP.

2. Use One Bay Area Grant (OBAG) Funds to Incentivize Local Action:

The One Bay Area Grant program is a critical tool for supporting local governments that will make the SCS a real action plan rather than a document that gathers dust on a shelf. For months, dozens of constituents from diverse viewpoints have written and testified before you, recommending that OBAG funding be used to directly reward those cities taking concrete steps to provide healthy and affordable neighborhoods for people of all incomes and races. These are the cities that are doing their part to make sure the Bay Area's growing population of low-wage workers have homes they can afford. They are also the cities working to reduce GHG emissions from cars by making sure that everyone can afford to live near where they work. We recommended that the OBAG program include clear eligibility criteria for cities seeking funding:

- a) using past affordable housing production to allocate funding at the local and county levels;
- b) requiring all jurisdictions receiving OBAG funding to commit to local policies to prevent displacement and promote affordable housing.

At their January 13, 2012 meeting, Commissioners on the MTC Planning Committee and the ABAG Members on the Administrative Committee expressed consensus in support of these directions. Once again, however, the April 4 revised staff proposal misses the mark. For a

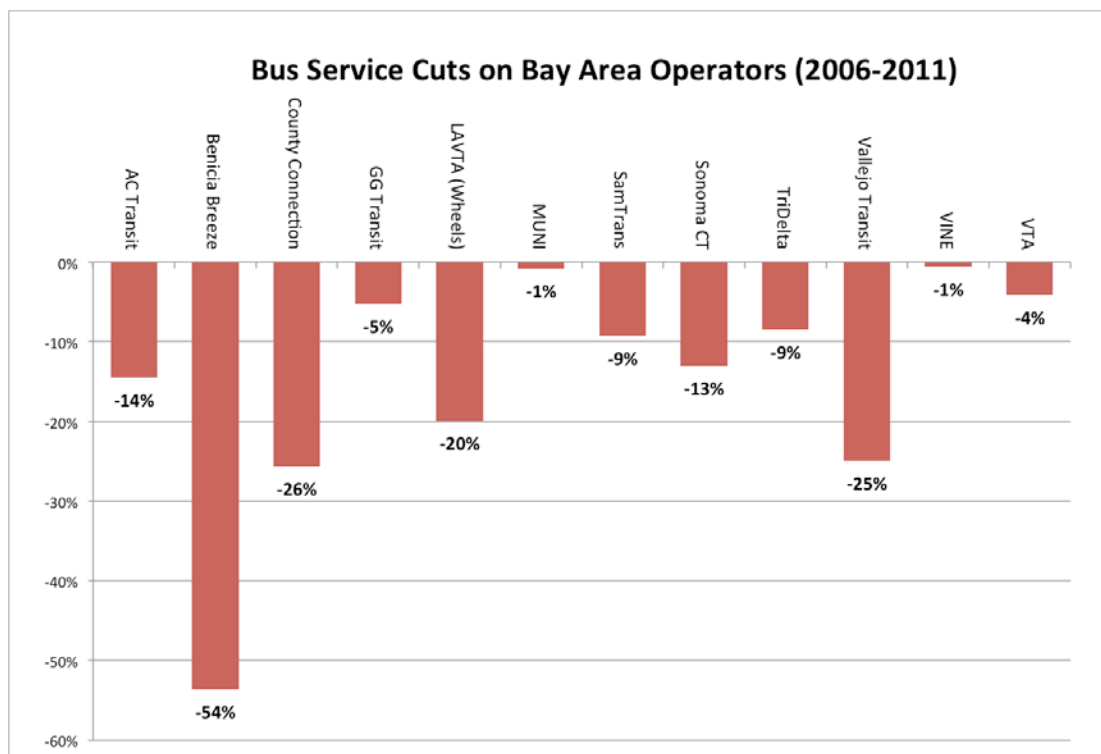
¹²*Stakeholder Input on Plan Bay Area Transportation Networks*, September 2011, p.5, available at: http://www.publicadvocates.org/sites/default/files/library/6_wins_letter_re_mtc_transp_networks_updated_signatories_09_12_11.pdf

program whose primary purpose is to support a *region-wide* vision of sustainability and equity, the latest proposal delegates too much decision-making authority to the county Congestion Management Agencies (CMA) and does not go far enough to reward and incentivize local jurisdictions that are making critical decisions about housing and land use. Moreover, it fails to require that strong affordable housing and anti-displacement policies are in place in all jurisdictions receiving OBAG funds, which will worsen the already serious crises of housing affordability and displacement in the region. The OBAG program is among the most important tools MTC and ABAG have to advance the core social equity mandates of the SCS, and it must be used effectively and fully.

ATTACHMENT C**Restoring a Reasonable Baseline of Local Transit Service in the Bay Area**

In the years following adoption of MTC's last two RTPs (2006-2011), every Bay Area transit operator has faced deep operating deficits and has responded by cutting service, raising fares, or both. The State had been steadily reducing transit operations assistance over the past decade, eliminating the State Transit Assistance (STA) program altogether in 2009, only to later restore about one-third of it through the "gas tax swap" that permanently reduced transit operations funding. This was compounded by historic lows in sales tax, gas tax, and property tax revenues — the other main funding sources for transit operations. Small operators and bus operators have been hit hardest, given their disproportionate dependence on STA and non-fare box revenues.

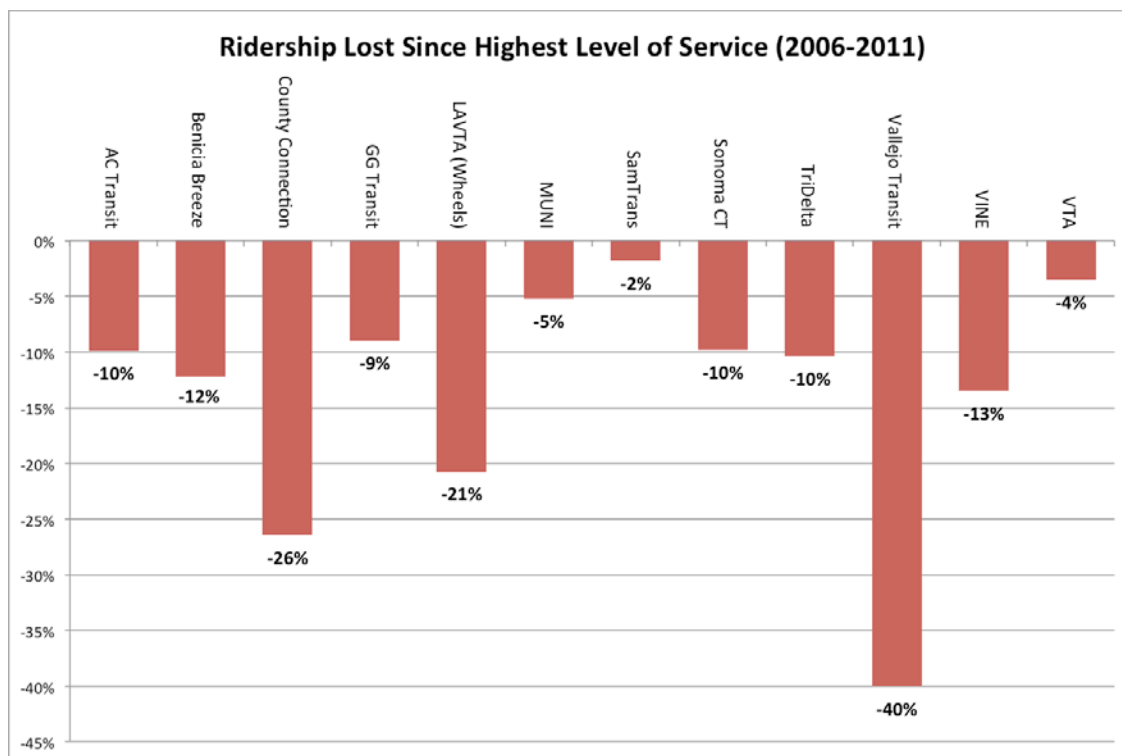
While a few operators have attempted to make "strategic" cuts by discontinuing or reducing lower-productivity lines, most operators have been forced to cut much more deeply, slashing substantial levels of service and leaving many riders without options for getting to work, school, or the doctor. Even in the case of "low-productivity" lines, the cuts seriously impact riders who depend on the service as a lifeline. Some operators cut service as much as 50%, with nearly every bus operator cutting service across the Bay Area, of which little has been restored. A total of 601,591 total annual bus service hours (Revenue Vehicle Hours) have been cut across the major bus operators. The chart below shows the amount of bus service that has been lost over the past five years by 12 of the Bay Area's bus operators, including the seven largest:



Percent decrease in bus service from highest level of service (Revenue Vehicle Hours) since 2006. Most operators peaked in service in FY 2008/2009. Sources: National Transit Database (NTD), LAVTA Comprehensive Annual Financial Report 2011, Internal Staff reported figures from AC Transit and TriDelta.

Statistical Summary of Bay Area Transit Operators, 2005-06 – 2009-11 supplemented Benicia Breeze data missing from NTD.

The loss of bus service has resulted in a major loss of ridership: an estimated 20 million fewer trips are being made by bus riders since the height of transit service during the past five years.



Sources: National Transit Database, Statistical Summary of Bay Area Transit Operators, 2005-06 – 2009-11.

Restoring the lost service with fixed-route bus transit would cost nearly \$70 million per year (see table below).

Annual Cost to Restore Regional Bus Service to Highest Levels Since 2006* (FY\$2010)	
Cost to Restore Before Farebox	\$84,775,732
Cost to Restore Minus Farebox	\$69,924,033

*Using the fully allocated operating cost per revenue hour, this gives us the upper bound estimate to restore service lost since 2006. Fully allocated operating costs and farebox recovery rates vary by operator.

Gas prices are rising and traffic congestion continues to worsen. In spite of the transit cuts, there is an historic increase in the demand for transit alternatives, particularly amongst the poor, who have been most burdened by the transit cuts. Studies have shown that restoring lost transit service recaptures lost riders and attracts new riders. For that reason, **it should be Plan Bay Area's top transportation priority to provide a reasonable baseline of local transit service, which would require restoration of transit service cuts made over the past five years.**



METROPOLITAN
TRANSPORTATION
COMMISSION



Association of
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May 3, 2012

Mayor Alan Nagy
City of Newark
37101 Newark Boulevard
Newark, CA 94560-3796

RE: Comments on Plan Bay Area

Dear Mayor Nagy:

Thank you for your correspondence dated April 26, 2012, to Ezra Rapport concerning the Plan Bay Area Jobs-Housing Connection Scenario and Transportation Investment Strategy.

Your comments will be presented to ABAG and MTC board members. Since the inception of Plan Bay Area, we have received numerous letters such as yours with detailed and thoughtful comments. ABAG and MTC staffs will present recommendations on a Preferred Scenario at a joint MTC Planning and ABAG Administrative Committee meeting on May 11, 2012.

Both agencies will meet jointly again on May 17 to approve a final Preferred Scenario. This will provide the basis for a draft Sustainable Communities Strategy (SCS) which will undergo an environmental assessment through the remainder of the calendar year. The draft SCS will be released at the end of this year, with adoption of a final SCS slated for April 2013.

We appreciate your concerns and suggestions. The outcome of this major planning effort will be better thanks to your participation.

Sincerely,

Doug Kimsey
Planning Director
Metropolitan Transportation Commission

Kenneth Kirkey
Planning Director
Association of Bay Area Governments



CITY OF NEWARK, CALIFORNIA

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April 26, 2012

Mr. Erza Rapport
Executive Director
Association of Bay Area Governments
101 Eighth St.
Oakland CA 94607

Regarding: Preferred Land Use Scenario

Dear Mr. Rapport,

I am writing on behalf of the Newark City Council to convey Newark's concerns about the Preferred Land Use Scenario, dated March 9, 2012.

We appreciate the monumental effort that has gone into the development of the Sustainable Communities Strategy and we hope that our comments can help to make it a better and more defensible plan. We have two primary concerns about the Preferred Scenario: 1) the housing increase assigned to Newark is disproportionately high, especially considering our lack of transit service; and 2) the disconnect between the proposed SCS growth allocations and transportation funding.

The housing increase is disproportionately high in Newark.

Newark is expected to accommodate a 38% increase (5,450 units) in housing in the 2010-2040 period. Surrounding cities, with substantially more mass transportation infrastructure, have much lower percentage increases- Fremont has only a 28% increase and Union City has only a 13% increase. A key criteria of this SCS vision is to put more development in proximity to a public transit. Newark does not have a BART station or significant public transit, while Fremont will have 4 BART stations and Union City has one. Although Newark does propose a Transit Oriented Development (TOD) project adjacent to the proposed Dumbarton Rail Service station, it was approved with a **maximum** of 2,500 units. Thus the Preferred Scenario has proposed that an additional 2,950 units be accommodated in other parts of Newark distant from transit service. Even taken alone, these 2,950 units would represent a 22% increase in housing units for Newark. By approving a Transit Oriented Development (TOD) Newark has shown its willingness to do its share to make development more sustainable, but to assign so many units above what can be accommodated in the TOD is inappropriate. In line with the goals of SB 375 housing units should be reallocated from Newark to areas with mass transportation infrastructure.

Mr. Ezra Rapport
Page 2
April 26, 2012

Transportation Investment/Housing Disconnect.

We are concerned that there is a disconnect between the proposed SCS growth allocations and transportation funding. At the same time that Preferred Scenario is proposing to assign very high levels of growth to Newark; MTC is proposing to remove The Dumbarton Rail Service- the only public transportation investment proposed in Newark- from the preferred transportation scenario. It is imperative that there be a linkage between transportation funding and the SCS. SB 375 requires coordination between transportation investment and housing. The housing scenario must use the same transportation assumptions as the Regional Transportations Plan (RTP). Therefore, if the Dumbarton Rail Service is not recommended for inclusion in the RTP network, the allocation of housing in Newark **must** be dramatically reduced. To do otherwise, would represent an increase in auto oriented housing development, in direct conflict with greenhouse gas reduction goals. To ignore this disconnect would be a violation of the spirit of SB 375 and could open the SCS to challenge under environmental impact disclosure laws.

We hope that these errors can be rectified in time to make the SCS an effective and defensible plan.

If you wish to discuss these concerns please contact me or Terrence Grindall of city staff at (510) 578-4208.

Sincerely,



Alan L. Nagy
Mayor, City of Newark

cc: Steve Heminger, Executive Director, Metropolitan Transportation Commission
Kenneth Kirkey, ABAG Planning Director
Newark City Council



METROPOLITAN
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May 2, 2012

Ms. Alice Fredericks
Board Chair
Transportation Authority of Marin
750 Lindero Street, Suite 200
San Rafael, CA 94901

RE: Comments on Plan Bay Area

Dear Ms. Fredericks:

Thank you for your correspondence dated 4/26/2012 to Ezra Rapport concerning the Plan Bay Area Jobs-Housing Scenario and Transportation Investment Strategy.

Your comments will be presented to ABAG and MTC board members. Since the inception of Plan Bay Area, we have received numerous letters such as yours with detailed and thoughtful comments. ABAG and MTC staffs will present recommendations on a Preferred Scenario at a joint MTC Planning and ABAG Administrative Committee meeting on May 11, 2012.

Both agencies will meet jointly again on May 17 to approve a final Preferred Scenario. This will provide the basis for a draft Sustainable Communities Strategy (SCS) which will undergo an environmental assessment through the remainder of the calendar year. The draft SCS will be released at the end of this year, with adoption of a final SCS slated for April 2013.

We appreciate your concerns and suggestions. The outcome of this major planning effort will be better thanks to your participation.

Sincerely,

Doug Kimsey
Planning Director
Metropolitan Transportation Commission

Kenneth Kirkey
Planning Director
Association of Bay Area Governments



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Novato
Eric Lucan

Ross
R. Scot Hunter

San Anselmo
Ford Greene

San Rafael
Gary Phillips

Sausalito
Mike Kelly

Tiburon
Alice Fredericks

County of Marin
Susan L. Adams
Katie Rice
Kathrin Sears
Steve Kinsey
Judy Arnold

April 26, 2012

Mr. Ezra Rapport
Executive Director
Association of Bay Area Governments
101 Eighth Street
Oakland, CA 94607-4700

Subject: Comments Regarding the Sustainable Communities Strategy
Draft Preferred "Jobs-Housing Connection Scenario"

Dear Director Rapport:

This letter transmits the Transportation Authority of Marin (TAM) Board's comments regarding the region's Sustainable Communities Strategy (SCS) Draft Preferred "Jobs-Housing Connection Scenario."

We recognize the Association of Bay Area Government (ABAG) staff for working with TAM and Marin County's local jurisdictions to adjust housing and employment forecasts to more accurately reflect local character and general plan capacity. We trust that ABAG will continue working closely with jurisdictions that have additional concerns regarding the projections.

We appreciate ABAG's recognition of Marin County's Priority Conservation Areas and agricultural land in the Plan Bay Area SCS. We cannot overstate the importance of these areas to the region.

Since its release on March 9, TAM staff has presented the "Jobs-Housing Connection Scenario" to the TAM Executive Committee, Board, the SCS Ad Hoc Committee, and the Marin County Planning Directors. In general, we received feedback that the current Marin housing and employment projections are more appropriate than previously presented in the Initial Vision Scenario or Alternative Scenarios. However, some jurisdictions continue to have concerns and will provide their comments directly to ABAG.

It is our understanding that ABAG has requested a peer-review of its housing and employment projections by the Bay Area Council's Economic Institute. We look forward to hearing the results of that review.

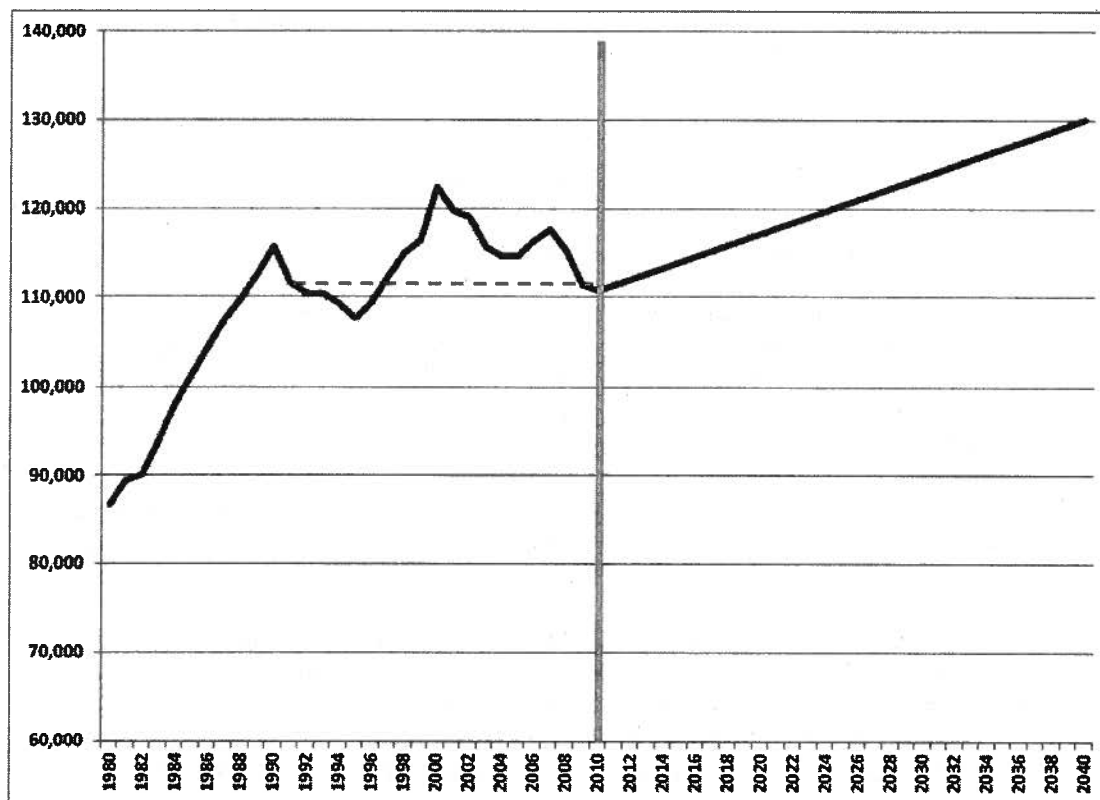
The intent of this letter is to provide county-wide comments on the Jobs-Housing Connection Scenario, based on discussions among our Board members and SCS Ad Hoc Committee. We have continuing concerns about the overall SCS that were stated in previous comment letters. Rather than restate

each point here, we refer you to our letters of June 13, 2011 and January 31, 2012.

Employment

The Jobs-Housing Connection Scenario forecasts employment growth at 17% by 2040, or about one-half percent per year. Although this appears to be consistent with historical growth of 16% from 1980-2010, in fact, and as pointed out by the County of Marin in its April 20 letter to ABAG, job growth in Marin was substantial only from 1980 to 1990. In 2011, employment levels are about the same that they were in 1990, as shown below in the red line, with a consistent decrease since 2000.

Marin County Payroll Employment 1980-2010 and ABAG/SCS Projections through 2040



Sources: ABAG/SCS Jobs-Housing Connection Scenario and Bureau of Labor Statistics (BLS)

Marin County lacks the type of developable land associated with business growth of the 1980s, and has limited availability of water resources. It is unlikely that Marin can match the robust job growth of the 1980s. Therefore, we advise against using the last 30 years as a basis for projecting future growth.

In addition, we are concerned that the long-term employment forecast may be unrealistically high for Marin's growing population of seniors who are retired or not fully employed. Some adjustment may be necessary to the labor participation rate. The SCS should accurately account for the reduction in greenhouse gas production and vehicle miles travelled associated with home-based employment and telecommuting, along the transportation corridors. We ask ABAG

and the Metropolitan Transportation Commission (MTC) to identify and adopt a method to account for these employment locations.

Housing

Senior housing is a crucial and urgent issue for Marin County. The Bay Area's senior population is expected to increase by 131% by 2040. Marin County is expected to have a higher than average proportion of seniors. We are very concerned that the State does not recognize most types of senior and other group housing as "units" that may be counted toward meeting a jurisdiction's Regional Household Needs Assessment (RHNA). If we build units according to existing rules, we risk "crowding out" our senior population by not providing the right type of housing for those who wish to remain in their communities, but not in their single-family home.

ABAG is in a unique position to educate and advocate with the state Department of Housing and Community Development to recognize common types of senior and other group housing for RHNA purposes and thereby meet the population needs projected by the SCS forecasts.

Finally, we want to again emphasize that Marin's unique place and role as a recreational, environmental and agricultural resource in the Bay Area should be a primary consideration in long-term regional planning scenarios.

We look forward to, every four years, ABAG's comparison of the projections with actual growth and subsequent adjustments to the projections, and to working with ABAG, MTC, and the public to lead the Bay Area into compliance with the SB 375 plan for greenhouse gas emissions reduction.

Respectfully,



Alice Fredericks
TAM Board Chair
Transportation Authority of Marin

cc: Steve Heminger, Metropolitan Transportation Commission
Marin County SCS Ad Hoc Committee
TAM Commissioners



METROPOLITAN
TRANSPORTATION
COMMISSION



Association of
Bay Area Governments

Joseph P. Bort MetroCenter
101 Eighth Street
Oakland, CA 94607

Phone: 510.817.5700
TDD/TTY: 510.817.5769
Fax: 510.817.5848
E-mail: info@mtc.ca.gov

Phone: 510.464.7900
E-mail: info@abag.ca.gov

May 3, 2012

Mayor Michael Metcalf
Town of Moraga
329 Rheem Boulevard
Moraga, CA 94556

RE: Comments on Plan Bay Area

Dear Mayor Metcalf:

Thank you for your correspondence dated April 30, 2012, to Ken concerning the Plan Bay Area Jobs-Housing Connection Scenario, ongoing SCS efforts and proposed OneBayArea Grant.

Your comments will be presented to ABAG and MTC board members. Since the inception of Plan Bay Area, we have received numerous letters such as yours with detailed and thoughtful comments. ABAG and MTC staffs will present recommendations on a Preferred Scenario at a joint MTC Planning and ABAG Administrative Committee meeting on May 11, 2012.

Both agencies will meet jointly again on May 17 to approve a final Preferred Scenario. This will provide the basis for a draft Sustainable Communities Strategy (SCS) which will undergo an environmental assessment through the remainder of the calendar year. The draft SCS will be released at the end of this year, with adoption of a final SCS slated for April 2013.

We appreciate your concerns and suggestions. The outcome of this major planning effort will be better thanks to your participation.

Sincerely,

A handwritten signature in black ink, appearing to read 'Doug Kimsey'.

Doug Kimsey
Planning Director
Metropolitan Transportation Commission

A handwritten signature in black ink, appearing to read 'Ken Kirkey'.

Kenneth Kirkey
Planning Director
Association of Bay Area Governments



Town of Moraga

TOWN COUNCIL

April 30, 2012

Mr. Kenneth Kirkey, ABAG Director of Planning and Research
Association of Bay Area Governments
P.O. Box 2050
Oakland, CA 94607-4756

Subject: Response to *Draft Jobs-Housing Connection Scenario*, Ongoing Sustainable Communities Strategy Efforts, and Proposed One Bay Area Grant

Dear Mr. Kirkey,

In reviewing the latest iteration of the Sustainable Communities Strategy, the Town of Moraga shares three primary concerns expressed by many other local agencies throughout the nine-county Bay Area. Specifically:

1. **Timing.** The timeframe for responding to ABAG's latest set of numbers makes it difficult to respond in a thoughtful and analytical manner. Smaller agencies like Moraga find it a particular challenge; our staffing levels tend to be lean and resources limited. Even the larger agencies have fewer staff to respond quickly to long-range planning issues. As ABAG continues its efforts, the Town of Moraga urges you to provide adequate time and resources to local governments to respond in a timely manner.
2. **Funding.** Moraga understands ABAG's key objective of the Sustainable Communities Strategy: creating the One Bay Area Grant. As it is currently presented, Moraga agrees with other agencies that funding will focus on the three larger Bay Area cities, San Francisco, San Jose, and Oakland, to the detriment of other cities and counties. Because Contra Costa County historically has developed in an auto-oriented fashion, many of its areas lack the infrastructure needed to significantly reduce vehicle miles traveled or to create the livable communities that ABAG envisions. Moraga has adopted a strategy that recognizes the reality of limited transit and pursues infill development that should reduce the need to travel in automobiles outside the community. The Moraga Center Specific Plan calls for high density infill, within a short transit ride to BART in Orinda and Lafayette. As planned, the area will offer a range of housing choices, including senior, student, and workforce housing. The housing choices will also accommodate families looking to locate in an exceptional public school district, as well as college students attending Saint Mary's College, consistent with ABAG's vision.

Mr. Kenneth Kirkey, ABAG Director of Planning and Research
Association of Bay Area Governments
April 30, 2012
Page 2

To be successful, however, communities such as Moraga need to provide transit, bicycle and pedestrian facilities that allow alternatives to single occupancy vehicles, contribute to lower greenhouse gas emissions, and create a thriving sense of place. Moraga, and other similar, suburban communities, could provide a model for re-imagining the traffic patterns in the Bay Area. In Moraga's case, a direct beneficiary would be Lafayette, its neighboring city that recently submitted its own letter on the topic.

By contrast, the three larger Bay Area cities already have the infrastructure in place to accommodate future growth. Moraga recognizes the differences in population projections. And, while Moraga hopes to increase its local employment base, it also recognizes that significant employment will likely concentrate in inner urban areas.

Instead, Moraga suggests ABAG apply a lens of relativity and perspective. Smaller cities that are willing to focus growth in their individual Priority Development Areas and potential PDA's should have similar funding as larger cities with much of its infrastructure in place. An approach that equitably shares the Bay Area's resources is more likely to effectuate a more successful One Bay Area. Each community in Bay Area is unique and individual. Becoming One Bay Area needs to balance a regional interest in reducing vehicle miles travelled with local interest in retaining individuality.

3. **Housing and Jobs Projections.** Moraga has not had a great deal of time to analyze and digest the numbers and calculations, yet it appears ABAG is reviving the Initial Vision scenario for Moraga and projecting approximately 1,500 more housing units than Moraga projects in its General Plan. Moraga has not grown significantly for the past twenty years, and it has not yet received a development application for the PDA since the Specific Plan was adopted two years ago. Like other cities, Moraga questions whether ABAG's projections reflect the severe economic climate and if ABAG recognizes the recovery will be slow. Conversely, projections for job growth do not take into account growth from Saint Mary's College.

The Town of Moraga recognizes ABAG's overall objectives and the Town intends to comply with state law to reduce greenhouse gas emissions while creating a regional approach to housing, employment, and transportation. However, the Town joins the chorus of other local agencies in requesting that ABAG:

1. Provide greater accommodation for local land use planning in ABAG's growth projections. In particular, the Preferred Scenario should be harmonized with historic development in each city and county and against each city and county's adopted general and specific plans;
2. Utilize cities' and counties' own projections, from their adopted general and specific plans, as the "no project" alternative in the Environmental Impact Report for the final SCS;

Mr. Kenneth Kirkey, ABAG Director of Planning and Research
Association of Bay Area Governments
April 30, 2012
Page 3

3. Employ the NEPA/Environmental Impact Statement approach in the environmental analysis of the SCS and its alternatives. In particular, this approach would include a comprehensive description and analysis of the alternatives (one of which would be projected future development in line with adopted general and specific plans), along with the project analysis;
4. Re-visit the criteria for the One Bay Area Grant. In particular, the grant should provide equal footing to all PDA's, recognizing that smaller agencies often lack the resources and the infrastructure necessary to realize ABAG's vision for the Bay Area; and
5. Construct a way for local agencies to receive funding for operations, including hiring local agency staff to prepare Complete Streets Plans and general plan amendments, as well as improving local transit service.

Moraga requests that ABAG respond to, and address, its concerns. Similarly, Moraga hopes that ABAG recognizes the broad implications its recent actions and projections have, and will have, on small agencies and communities that are balancing an interest to plan locally with recognizing regional implications of growth and conservation.

Please feel free to contact Moraga's Planning Director, Shawna Brekke-Read, by phone 925.888.7040 or email sread@moraga.ca.us if you have any questions.

Sincerely,

Michael Metcalf

Michael Metcalf, Mayor



METROPOLITAN
TRANSPORTATION
COMMISSION



Association of
Bay Area Governments

Joseph P. Bort MetroCenter
101 Eighth Street
Oakland, CA 94607

Phone: 510.817.5700
TDD/TTY: 510.817.5769
Fax: 510.817.5848
E-mail: info@mtc.ca.gov

Phone: 510.464.7900
E-mail: info@abag.ca.gov

May 3, 2012

Mayor Jennifer West
City of Emeryville
1333 Park Avenue
Emeryville, CA 94608-3517

RE: Comments on Plan Bay Area

Dear Mayor West:

Thank you for your correspondence dated May 1, 2012, to Ezra Rapport concerning the Plan Bay Area Jobs-Housing Connection Scenario and Preliminary Draft Regional Housing Needs Allocation.

Your comments will be presented to ABAG and MTC board members. Since the inception of Plan Bay Area, we have received numerous letters such as yours with detailed and thoughtful comments. ABAG and MTC staffs will present recommendations on a Preferred Scenario at a joint MTC Planning and ABAG Administrative Committee meeting on May 11, 2012.

Both agencies will meet jointly again on May 17 to approve a final Preferred Scenario. This will provide the basis for a draft Sustainable Communities Strategy (SCS) which will undergo an environmental assessment through the remainder of the calendar year. The draft SCS will be released at the end of this year, with adoption of a final SCS slated for April 2013.

We appreciate your concerns and suggestions. The outcome of this major planning effort will be better thanks to your participation.

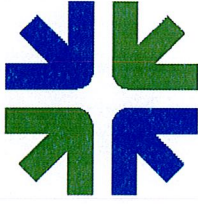
Sincerely,

A handwritten signature in dark ink, appearing to read 'Doug Kimsey'.

Doug Kimsey
Planning Director
Metropolitan Transportation Commission

A handwritten signature in dark ink, appearing to read 'Kenneth Kirkey'.

Kenneth Kirkey
Planning Director
Association of Bay Area Governments



CITY OF EMERYVILLE

INCORPORATED 1896

1333 PARK AVENUE

EMERYVILLE, CALIFORNIA 94608-3517

Tel: (510) 596-4300 FAX: (510) 658-8095

May 1, 2012

Ezra Rapport, Executive Director
Association of Bay Area Governments
101 Eighth Street
Oakland CA 94607

Subject: Draft Jobs-Housing Connection Scenario and
Preliminary Draft Regional Housing Needs Allocation

Dear Mr. Rapport:

I am writing to convey the Emeryville City Council's response to the draft Jobs-Housing Connection Scenario and the preliminary draft Regional Housing Needs Allocation. A draft resolution is attached, and responses to the questions posed by ABAG are included below.

1. Distribution Methods. It both the Scenario and the Regional Housing Needs Allocation (RHNA), there is no recognition of the impact of the loss of Redevelopment Agency funds, the reduction of Federal funding for affordable housing, the lack of State affordable housing bond funds, the weak market for new ownership housing and the Palmer v. Los Angeles decision on local government's ability to facilitate the development of affordable housing or the infrastructure needed to supply affordable and market rate housing.

Allocating a larger share of RHNA to the cities near jobs and transit will have the perverse effect of making it difficult for those cities to achieve certified housing elements and thus compete for funding for affordable housing and infrastructure.

Focusing this much growth in the three largest cities and three transit corridors in both the RHNA and the Scenario takes the transit and urban focus too far. There are logical places for dense growth in PDAs that are not on the three major transit corridors that should be included in the distribution of the SCS and RHNA.

2. Our Jurisdiction. In addition to the major problems discussed above, Emeryville's Scenario housing number is 122% of the local plan number. ABAG staff reported that it was not adjusted to 115% because all of Emeryville's residential development is planned for the PDA, leaving no units outside the PDA to subtract, and ABAG staff thought there

was room for more development in Emeryville's PDA. Currently the City of Emeryville has a housing density of 5,542 units per square mile, more than Oakland or San Jose., The SCS would increase that density to 10,358 units per square mile, surpassing San Francisco's SCS 2040 density of 9,756 units per square mile. In addition to adjusting for loss of affordable housing and infrastructure funding, Emeryville's number should be adjusted to 115% of the local plan number in alignment with other cities.

The preliminary draft RHNA would task Emeryville with developing 1,252 units per square mile during the 2014-2022 period, compared to 533 units per square mile in San Francisco, 221 units per square mile in Oakland, and 170 units per square mile in San Jose. The RHNA numbers should be adjusted to reflect a lower Scenario number and the allocation of housing should be spread to other PDA's.

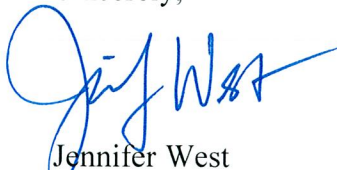
3. Data. The data are correct.

4. Scenario and Ability to Advance SCS Goals. Emeryville can attempt to advance the goals and principals of the SCS if the housing growth in the SCS are close to the General Plan growth projections. However, Emeryville may not be able to meet its General Plan goals, let alone the SCS goals if additional resources for the development of new affordable housing and tools to enforce inclusionary zoning in market rate housing are not available.

5. Additional Comments. Given the loss of redevelopment, the loss of State and Federal affordable housing funds, the state ban on rent control and the Palmer v. Los Angeles decision's effect on inclusionary rental housing, what you are asking is not possible. Even if these factors were not present, Emeryville would want to have parity with other cities in the distribution method, bringing our numbers down to the same level as other cities even if our projected growth is all in the Priority Development Area.

The City of Emeryville looks forward to working with ABAG in resolving issues with housing distribution in the Sustainable Communities Strategy and the Regional Housing Needs Allocation.

Sincerely,



Jennifer West
Mayor

Cc: Ken Kirkey, ABAG Planning Director

Athena Ullah, Regional Planner for Alameda County

Patrick D. O'Keeffe, City Manager

Helen Bean, Economic Development Director

Charles S. Bryant, Director of Planning and Building

Diana Keena, Associate Planner

RESOLUTION NO. 12-

**RESOLUTION OF THE CITY COUNCIL OF THE CITY OF EMERYVILLE
PROTESTING EMERYVILLE'S HOUSING ALLOCATIONS IN THE DRAFT
JOBS-HOUSING CONNECTION SCENARIO FOR PLAN BAY AREA AND THE
PRELIMINARY DRAFT REGIONAL HOUSING NEEDS ALLOCATION**

WHEREAS, the Association of Bay Area Governments (ABAG) and the Metropolitan Transportation Commission (MTC) have released a Jobs-Housing Connection scenario for the state-mandated 2010-2040 Plan Bay Area Sustainable Communities Strategy (SCS), which ABAG will use to assign the 2014-2022 Regional Housing Need Allocations to cities and counties; and

WHEREAS, the Regional Housing Needs Allocation (RHNA) is used in preparing each city's General Plan Housing Element, and affects each City's ability to achieve a State-certified housing element and obtain funding for housing and infrastructure; and

WHEREAS, the State banned rent control and the Palmer decision has exempted rental units from inclusionary zoning requirements except in cases where public assistance is provided for the housing; and

WHEREAS, the State of California terminated Redevelopment Agencies, which provided public funding for affordable housing; and

WHEREAS, the draft SCS scenario and preliminary draft RHNA do not recognize that the loss of Redevelopment Agency funds and the Palmer decision limit the capacity of local governments to fund the development of affordable rental units; and

WHEREAS, high RHNA numbers in the cities on transit corridors will have the perverse effect of making it impossible for these cities to achieve certified Housing Elements and obtain funding for affordable housing and infrastructure; and

WHEREAS, The SCS scenario gives residential growth rates of 87% to Emeryville, 26% to Alameda County, 23% to Oakland, 21% to San Francisco, and 37% to San Jose; and

WHEREAS, in allocating new residential units in the draft SCS scenario, ABAG ensured that most cities' housing numbers would not exceed 115% of the local General Plan number, but allocated Emeryville 122% of its General Plan number because Emeryville plans all of its residential growth in its Priority Development Area; and

WHEREAS, the draft SCS scenario allocates 5,780 new housing units to Emeryville over the 30-year period, Emeryville's General Plan trend extended to 2040 allocates 4,725 new units, and 115% of Emeryville's General Plan trend number is 5,434, which is 346 units less than the SCS scenario allocation; and

WHEREAS, Emeryville's resulting 2014-2022 RHNA is 1,559 housing units, which is 422 more units than its 2007-2014 RHNA, a 37% increase over 2007-2014; and

WHEREAS, reducing Emeryville's 30-year SCS residential growth to 115% of its General Plan growth would reduce Emeryville's 8-yr RHNA by about 92 units; and

WHEREAS, Emeryville achieved 74% of its 2007-2014 RHNA, including 170 below market rate units and 668 market rate units; and

WHEREAS, the below market rate units were produced by using redevelopment tax increment and rental inclusionary zoning, neither of which is available now, and the below market rate units were produced in a financing climate that no longer exists; and

WHEREAS, Emeryville is highly unlikely to meet either the 2007-2014 RHNA or the preliminary draft 2014-2022 RHNA; and

WHEREAS, the draft SCS scenario and preliminary draft RHNA do not address the reality caused by recent legislation or parity with other cities; now, therefore, be it

RESOLVED that the City Council of the City of Emeryville hereby protests the housing numbers allocated to it in the draft SCS scenario and the preliminary draft RHNA; and be it further

RESOLVED that the City Council of the City of Emeryville hereby requests that ABAG address the severely diminished capacity of local governments to facilitate the development of affordable housing units due to the loss of Redevelopment Agency funding and the Palmer decision by reducing the allocation of affordable housing units to the City of Emeryville in the SCS and RHNA; and be it further

RESOLVED that the City Council of the City of Emeryville hereby requests that ABAG reduce Emeryville's 2010-2040 SCS residential growth to 115% of its local plan number or less as it did with other cities, and reduce Emeryville's draft RHNA accordingly.

ADOPTED by the City Council of the City of Emeryville at a regular meeting held on Tuesday, May 1, 2012.

ATTEST:

CITY CLERK

MAYOR

APPROVED AS TO FORM:

CITY ATTORNEY

From:
To: <info@mtc.ca.gov>
Date: 5/9/2012 1:36 PM
Subject: MTC: Please Strengthen the Draft Transportation Investment Strategy

Metropolitan Transportation Commissioner

Dear MTC Commissioners and ABAG Board Members,

The Sustainable Communities Strategy (SCS) offers the Bay Area a great opportunity to fundamentally change the region's growth paradigm away from sprawl and towards walkable communities. SB 375 asks each region to develop a new blueprint for transportation, housing and land use that focuses on reducing driving and associated greenhouse gas emissions.

In addition to the GHG reduction targets, you embraced SB 375's performance focus by adopting a set of ten targets to meet other key regional goals: providing housing for people of all incomes, improving health through more physical activity, reducing the cost of transportation, and preserving open space.

However, the performance analyses completed to date have shown that the region's alternative scenarios have fallen far short of the targets. According to MTC analyses, in each scenario:

- The transportation and land use components would only reduce GHG emissions by 8-9% per capita, well short of our 15% target. The Climate Policy Initiatives proposed in this new investment strategy will not bridge that gap.
- Low-income families would spend 84% or more of their income on housing and transportation. This is a recipe for debt and displacement that regional policy must attempt to combat.
- Inadequate housing will hurt the economy, reducing potential job growth by more than 10%.

These are not results that we can be proud of. We recognize that the transportation investment package can only do so much towards any given target. At your May 11th joint meeting, you have an opportunity to set a preferred Transportation Investment Strategy that will make our region better.

Please consider the following recommendations for improvement on each of the six strategies laid out in staff's proposed Draft Transportation Investment Strategy. Taken together, these recommendations will improve the plan, do a better job of responding to your targets, and move us forward towards One Bay Area.

1. Close the GHG Gap with an Effective Climate Policy Initiative: Fund the Climate Innovative Grants program.
2. Fix it First for Transit: Require BART and Muni to address their shortfalls by imposing special requirements on at least BART and Muni to develop a funding plan to demonstrate how they will achieve a State of Good Repair, or at least how they will continue to maintain the existing level of repair. In the meantime, MTC should give greater scrutiny to capital expansion projects by the two agencies.
3. Get the One Bay Area Grant Framework Right: Revise the One Bay Area Grant program to provide more guidance to counties to make the program better address displacement, encourage affordable housing, and support sustainable and equitable growth in PDAs.
4. Fund the Highest-Performer: BART Metro Project. Dramatically increase funding for the BART Metro project, the most cost-effective project MTC analyzed.
5. Squeeze more Efficiency with Smarter Investments in the Bay Area Express Lane Network: Eliminate the projects that would widen I-80 to Yolo County line and I-580 to the San Joaquin County line. Commit to a transparent public planning process to ensure the network creates more transportation choices and supports access for low-income residents.
6. Make the Transit System Sustainable: Increase investments in the Transit Performance Initiative and the Lifeline Transportation Program.

We urge you to make these recommendations a reality as you adopt the Transportation Investment

Strategy for the preferred scenario. The Sustainable Communities Strategy is an opportunity for the Bay Area to fundamentally change the region's growth paradigm away from sprawl and towards walkable communities.

Sincerely,



May 8, 2012

424 Pendleton Way
Oakland, CA 94621
510-638-5864 phone
510-638-8984 fax

lung.org/california

Adrienne Tissier, Chairwoman, MTC
Jim Spering, Chair, Joint MTC Planning Committee/ABAG Administrative Comm.
Metropolitan Transportation Commission
101 Eighth Street
Oakland, CA 94607

Re: Bay Area SCS/RTP and One Bay Area Grant

Dear Chairwoman Tissier, Chairman Spering and Members of the Commission:

Thank you for your leadership on the Sustainable Communities Strategy and the hard work of staff to work with regional agencies and community stakeholders in this process. We appreciate the inclusion of public health performance measures in the evaluation of the scenarios, and the continuing recognition of the potential for transportation and land use investments to benefit public health.

The Sustainable Communities Strategy process offers an unprecedented opportunity to maximize public health, social equity and other community benefits at the same time you are reducing greenhouse gases. While we applaud the efforts made by MTC members and staff over the past two years to develop this plan, we believe more can be done to focus investments in innovative ways to get more people walking, biking and taking transit. We believe this will help to ensure that our region is on track for clean air and the healthy future that it deserves.

Bay Area SCS/RTP Transportation Investments

One key concern is that the transportation and land use components of the SCS/RTP would only reduce GHG emissions by 8-9% per capita, well short of our 15% target.

1) To close the gap, we urge MTC to consider additional strategies that reduce car trips and to increase funding for programs that promote alternatives to driving such as car sharing, vanpooling and bicycle sharing which have demonstrated meaningful reductions in greenhouse gases.

Increasing walking and bicycling is an essential strategy to combat air pollution and global warming while helping to significantly improve physical activity and reduce skyrocketing chronic disease rates.

Research by Neil Maizlish, PhD, MPH, of the California Department of Public Health, using Metropolitan Transportation Commission data, demonstrated that increasing walking and cycling-related transportation from the current average of 4 minutes to 22 minutes a day would translate into the following reductions of chronic disease:

- 14% reduction in heart disease, stroke, and diabetes
- 6-7% reduction in dementia and depression
- 5% reduction in breast and colon cancer

These reductions in chronic disease are unprecedented, would add 9.5 months to life expectancy and could save up to \$22 billion in annual Bay Area health care costs.

- 2) To help analyze the full health impacts of the various scenarios to be analyzed under the environmental review process, we urge MTC to run more scenarios using the Maizlish methodologies and to incorporate health benefits more broadly into the discussion of benefits from active transportation.**

While we support the inclusion of measures to accelerate the transition to electric vehicles, this must be balanced with robust measures to reduce vehicle miles traveled in order to reach our climate goals as well as our air quality goals. According to the Natural Resources Defense Council, to achieve an 80 percent reduction in greenhouse gases by 2050, we will need to achieve a fleet average of 80 mpg, in addition to a 25 percent VMT reduction (or a 32 percent reduction in business as usual), and a 45% reduction of carbon in fuel.

- 3) The Bay Area must commit to a robust set of policies that will dramatically reduce car trips by providing alternatives to driving and incentivizing alternative transportation measures and policies, such as congestion pricing and parking pricing. We believe it is important to achieve emission reductions beyond what is feasible through state control program measures, in order to maximize reductions to air pollution through land use and transportation patterns and policies.**

One Bay Area Grant

We are disappointed to see that MTC has dropped the requirement for local jurisdictions to have Community Risk Reduction Plans as a criteria to receive grant funding. These plans are an important tool to ensure that adequate analysis is conducted and mitigations implemented to reduce air pollution exposure in developments near high traffic areas where infill development is often likely to occur.

American Lung Association in California
Page 3

- 4) To protect residents from air pollution exposures, we urge the development of clear regional guidelines for infill development for use by all Bay Area Congestion Management Agencies (CMAs) and local jurisdictions based on best practice measures developed by the Bay Area Air Quality Management District.**

Finally, the Bay Area cannot achieve its climate change goals without a strong commitment to active transportation. We are pleased that MTC is prioritizing grant funding to Priority Development Areas (PDA) to maximize transit use and increase walking and cycling.

- 5) To protect funding for bicycle and pedestrian projects, we urge MTC to define limits on what constitutes projects that provide proximate access to PDAs, to ensure that limited funds are not shifted from bicycle and pedestrian projects to road rehabilitation.**

Thank you very much for your consideration of these recommendations to strengthen the Bay Area Sustainable Communities Strategy to improve and protect public health.

Sincerely,

A handwritten signature in cursive script that reads "Jenny Bard".

Jenny Bard
American Lung Association in California

CC:

Steve Heminger, Executive Director, Metropolitan Transportation Commission
Jack Broadbent, Chief Executive Officer, Bay Area Air Quality Management District



City of Sebastopol

City Council



SEBASTOPOL

Local Flavor. Global Vision.

RECEIVED
MAY 09 2012

METROPOLITAN TRANSPORTATION
COMMISSION

May 3, 2012

Mayor
Guy Wilson
City Council
Michael Kyes, Vice Mayor
Kathleen Shaffer
Sarah Glade Gurney
Patrick Slayter

Mr. Mark Luce, President
Association of Bay Area Governments
P. O. Box 2050
Oakland, CA 94604

Mr. Steve Heminger, Executive Director
Metropolitan Transportation Commission
101 Eighth Street
Oakland, CA 94607

City Manager
Jack Griffin
City Attorney
Larry McLaughlin
City Clerk
Mary Gourley

Gentlemen,

The City Council of the City of Sebastopol wishes to offer the following comments on the Jobs-Housing Scenario as presented to the Sonoma County Transportation Board of Directors on April 9, 2012, and the most recent iteration of One Bay Area Grant (OBAG) Policy Program Revisions as outlined in a memo titled "Update on Proposed One Bay Area Grant - Cycle 2 STP/CMAQ Funding, dated April 12, 2012, to the Partnership Programming and Delivery and Partnership Local Streets and Roads Working Groups.

The City of Sebastopol supports the basic concepts of the ongoing MTC-ABAG efforts, including the objective of addressing greenhouse gas emissions, however, we do have some serious concerns.

The projected household growth for Sebastopol appears generally consistent with our General Plan's Growth Management Program, however, the projected employment growth implies a level of non-residential development beyond what appears likely to occur. We would appreciate an explanation of the rationale for this projection, and consideration for reducing this aspect of the projection.

We are very concerned with the continuing focus on PDAs. As originally understood by many communities, PDAs were optional planning tools that might enhance funding eligibility. However, their policy significance has substantially increased, and we strongly question whether this is the best approach for this regional planning effort. While we appreciate recent revisions to the planned funding formulas that provide enhanced flexibility, serious consideration should be given to more broad criteria for future funding that is not so highly focussed on PDAs.

In regard to a potential requirement for a 'Complete Streets' ordinance by October of this year, this would be difficult for many communities. The City of Sebastopol, like most jurisdictions in the Bay area, supports Complete Streets policy; in fact at our May 1 meeting the Council appointed members to our newly formed Complete Streets Advisory Committee, whose purpose is to assist the City in putting these policies into practice in Sebastopol. However, ordinances are not typically used for this purpose. Either utilizing Complete Streets criteria to evaluate funding applications for



City of Sebastopol

City Council

appropriate classes of projects, or asking local jurisdictions to adopt a resolution supporting Complete Streets principles would seem a far more appropriate approach.

We are very concerned with the concept of local Congestion Management Agencies becoming involved with affordable housing policy. This goes beyond the historical role and expertise of such agencies, and would dilute their primary focus on transportation issues. In addition, there is no identified source of funding for the CMAs to conduct these activities.

Regarding the requirement that jurisdictions have their general plan housing elements adopted and approved by HCD for 2007-14 RHNA prior to July 1, 2013, the State legislature establishes the timing and frequency under which jurisdictions in the region must certify their housing elements. There is no need for ABAG/MTC to impose additional deadlines which might be at odds with current or future legislative requirements, and this requirement should be dropped.

We are encouraged by several of the new proposed policy modifications that are responsive to earlier comments returned by the CMAs, which we support, including

- Increasing Priority Development Area Flexibility by reducing the required percentage of funding to be spent within PDAs (or providing proximate access to PDAs) from 70% to 50% (as a Countywide aggregate) , and allowing the local agencies to evaluate and define the meaning of "proximate access" on a project basis.
- Funding a Regional Safe Routes to School program at \$5 million annually for four years.
- Adding a fourth year of funding to Cycle 2 to increase timelines for project delivery.
- Retaining the North Bay Priority Conservation Area Pilot Program (farm to market transportation projects, and open space acquisition / access) for the North bay Counties of Marin, Napa, Solano and Sonoma.

Thank you for the opportunity to provide comments on these proposals on behalf of the City Council of the City of Sebastopol.

Very Truly Yours,

Guy Wilson, Mayor

cc: MTC Commissioner Jake McKenzie (City of Rohnert Park)
 ABAG Representative Tiffany Renee (City of Petaluma)
 Suzanne Smith, Executive Director, Sonoma County Transportation Authority
 City Councilmembers Gurney, Kyes, Shaffer and Slayter
 City Manager
 Engineering Director



May 17, 2012

Honorable Alan L. Nagy
Mayor
City of Newark
37101 Newark Blvd.
Newark, CA 94607

Dear Mayor Nagy:

Thank you for your May 10, 2012 letter to Steve Heminger, MTC's Executive Director, regarding the Dumbarton Rail Service project's status in the current RTP update (known as Plan Bay Area).

The current title for the Dumbarton Rail Corridor Project Phase 1 (RTP ID#240018) in the RTP is: "Implement commuter service between Peninsula and East Bay, including implementation of Phase 1 service as determined by on-going environmental work, railroad right-of-way acquisition, and environmental only for rail improvements." This language was agreed to by the ACTC staff.

The agreed-upon project definition language accomplishes two things:

1. It does not pre-suppose the final outcome of your ongoing environmental analysis
2. The RTP is required to be financially constrained – every project included must demonstrate full funding to be included in the plan. As such, the agreed-upon project description recognizes that there currently is not a viable capital plan to construct the complete rail project, but is intended to give you maximum flexibility as you proceed forward with the environmental, right-of-way purchase and project development.

Keep in mind that the RTP is updated every four years and can be amended earlier as new conditions warrant.

I hope this letter addresses your concerns. If you or your staff have further questions regarding this issue, please contact me at dkimsey@mtc.ca.gov or 510-817-5790

Sincerely,

A handwritten signature in black ink, appearing to read "Doug Kimsey".

Doug Kimsey
MTC Planning Director



CITY OF NEWARK, CALIFORNIA

37101 Newark Boulevard • Newark, California 94560-3796 • (510) 578-4000 • FAX (510) 578-4306

May 10, 2012

Metropolitan Transportation Commission
C/O Steve Heminger, Executive Director
101 Eighth St.
Oakland CA 94607

Regarding: Request for Dumbarton Rail Service Inclusion in the Preferred Investment Strategy

Dear Commissioners,

I am writing on behalf of the Newark City Council to convey our strong objections to the proposed removal of the Dumbarton Rail Service from the preferred Transportation Investment Strategy and thus from inclusion in the Regional Transportation Plan (RTP).

The Dumbarton Rail Service is a Resolution 3434 Project, was included in voter approved Regional Measure 2, is in the current Regional Transportation Plan, and is well along in the environmental and design process.

The Dumbarton Rail Service would provide transportation options connecting the East Bay with the West Bay, providing service to proposed transit oriented developments-including Newark's Dumbarton TOD and Facebook's massive proposed office complex in Menlo Park - and an important connection to future high speed rail. As the region is grappling with ways to become more sustainable, the Dumbarton Rail Project provides the opportunity to relieve congestion, reduce air pollution, facilitate sustainable development; preserve and reuse a part of the Bay Area's railroad history and the first bay crossing the Dumbarton Rail Bridge.

Although the Transportation Investment Strategy contains some discussion of continuing environmental work and potential right-of-way acquisition, the Strategy, as proposed, does not actually include the Dumbarton Rail Project. If the RTP does not include the Dumbarton Rail Project it would be a major blow to the progress of this project as it would interfere with circulation of the environmental document and thus halt the project. Furthermore, the project's removal would undermine transit oriented development in both the West and East Bay, undermine the Sustainable Communities Strategy- requiring the accommodation of more housing and job growth in other areas in order to maintain greenhouse gas reduction goals.

May 10, 2012

Therefore, we respectfully request that this project be included in the Transportation Investment Strategy and ultimately in the new Regional Transportation Plan.

If you wish to discuss these concerns please contact me or Community Development Director Terrence Grindall (510) 578-4208.

Sincerely,

A handwritten signature in dark ink, appearing to read "Alan L. Nagy". The signature is fluid and cursive, with the first name "Alan" and last name "Nagy" clearly distinguishable.

Alan L. Nagy
Mayor, City of Newark

cc: Newark City Council

Aiden Hughes, San Mateo County Transportation Authority

Art Dao, Alameda CTC Executive Director

Menlo Park City Council

Redwood City City Council

Fremont City Council

Union City City Council

Plan BayArea

May 17, 2012

Ms. Stephanie Reyes, Policy Director
Greenbelt Alliance
631 Howard Street, Suite 510
San Francisco, CA 94105

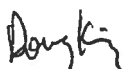
RE: Response to Email Dated 5/16/2012

Dear Ms. Reyes:

Thank you for your involvement in the Plan Bay Area process and for your email of May 16, 2012, which expresses your reflections on the Plan Bay Area preferred scenario, the OneBayArea Grants program, and the Regional Housing Needs Allocation draft methodology.

We encourage you to stay engaged in the Plan Bay Area process. The outcome of this major planning process will be better thanks to your participation.

Sincerely,



Doug Kimsey
Planning Director
Metropolitan Transportation Commission

From: "Stephanie Reyes" <sreyes@greenbelt.org>
To: <Thomas_W_Azumbrado@HUD.GOV>, <dgiacopini@mtc.ca.gov>, <jimzspering@sbc...>
Date: 5/16/2012 12:57 PM
Subject: Greenbelt Alliance's comments on Plan Bay Area and related items for Thursday 5/17 meeting

Dear Chair Tissier, President Luce, MTC Commissioners and ABAG Executive Board members,

Please find below Greenbelt Alliance's reflections on the Plan Bay Area preferred scenario, the One Bay Area grant program, and the Regional Housing Needs Allocation draft methodology for your meeting tomorrow, Thursday May 17th. You can also find this information on our blog at <http://www.greenbelt.org/blog/>

I look forward to seeing you tomorrow night in Oakland.

Best regards,

Stephanie Reyes
 Policy Director

Greenbelt Alliance
 631 Howard St., Suite 510 • San Francisco, CA 94105
 (415) 543-6771 x319 • sreyes@greenbelt.org

Open Spaces & Vibrant Places
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The quick summary

On the whole, this is a great preferred scenario. It will **provide more choices** to current and future residents for types of neighborhoods to live in and transportation options for how to get around. It will **protect our iconic natural lands and farms** for our children and grandchildren.

And speaking quite personally, it will reward the lifestyle that I have come to love dearly. I love the neighborhood I live in now. The condo I live in is just right for my husband and me, since neither of us want to maintain a large house or a yard. We can walk downtown to restaurants, the drugstore, the grocery store, the library, and the dry cleaners. And Caltrain is just a few blocks away; I take the train north to work in San Francisco, Rafael takes it south to San Jose. Our location means the two of us can manage just fine with only one car, which can save a lot of money.

The Plan Bay Area preferred scenario will reward the many many Bay Area residents who have lifestyles like mine, but it also takes into account that in the future, should we choose to move – maybe as we expand our family (fingers crossed!) – we'll still have **plenty of options** for places to live that provide the lifestyle we like. And as our parents get older, they'll have places they can downsize to that allow them to maintain their independence even if they have trouble with stairs or with driving.

Is the scenario perfect? Of course not. There are still some ways it could be even better – I'll outline some of those below. But overall, this plan is a big step forward for the Bay Area.

The specifics

Here are **some of the ways the preferred scenario is good for Bay Area residents**. The plan:

Provides choices of neighborhoods to live in and ways to get around:

- The plan emphasizes building new homes as townhomes, apartments, and condominiums. This helps meet the demands of the households of the future, though still falls short of meeting demand for those housing types (the region will actually have almost 170,000 *more* single-family homes than people will want in the year 2040).
- These new housing types increase the walkability of neighborhoods; when there are more customers in an area, they can support more shops and other uses close by.
- 80% of new homes and 66% of new jobs will be in Priority Development Areas – places near current or planned transit, in our existing cities and towns. This provides more opportunities to live in places with many choices for how to get around – take the car if you want, or leave it at home and take the train, bus or bike instead.

Protects open spaces

- 99% of new growth will occur in our existing developed footprint. Wow. That means our existing parks, wildlife habitat, and farm and rangeland will still be around for our children and grandchildren to enjoy.
- The plan includes an innovative \$10 million pilot grant program specifically geared towards conservation. This is a historic step by a transportation agency.

Encourages affordable homes

One of the biggest environmental, economic, and social equity challenges in the Bay Area is the shortage of affordable homes in desirable neighborhoods. The One Bay Area grant program takes steps to address this by:

- Directing more dollars to the counties who collectively do the most for planning and building new homes affordable to families at all income levels
- Requiring that cities have an up-to-date Housing Element – a plan for where new homes can go, and steps to make it easier to build affordable homes in the right places – in order to receive funding.
- Encouraging counties to take into account a city's affordable housing production and related policies when distributing dollars to cities.

Supports walking and biking

- Requires cities to have a "complete streets" policy in place so when streets are upgraded they are designed for pedestrians, bicyclists, seniors, children and the disabled as well as for cars and buses.
- Invests \$5 million annually in the Safe Routes to Schools program that supports walking and biking to school.

Improves health and reduces air pollution

- Reduces greenhouse gas emissions by 17% per capita by 2035
- Reduces air pollution from soot and dust, increasing life expectancy
- Increases "active transportation" – time spent walking and biking

Includes a "fix-it-first" approach

- Dedicates 88% of funds to operating and maintaining our existing roads and transit systems.

As I mentioned, there are **several ways the plan still needs improvement**. The main land-use related changes

we'd like to see are:

Provide opportunity to low-income families

- It's no secret that wealthier communities tend to have nicer parks, better schools, and access to good jobs. To allow low-income families the same opportunities as wealthy families, it makes sense for communities with above-average median income to take on at least as much of a share of the region's need for affordable housing as they have in the past.
- Every city has a role to play in providing affordable homes and preventing families from being priced out as a city develops. The OneBayArea grants should set specific expectations for cities to meet in order to receive grant funds.

Ensure conservation grant dollars are spent on true conservation

- As currently written, the conservation grants could be spent on things like paving rural roads. We think this pilot program needs to focus on true conservation projects, like protecting open space from development, which can leverage funds from conservation organizations.

Maximize our ability to attract jobs

- The preferred scenario plans for 1.1 million new jobs and increases Gross Regional Product by 114%. But the region could actually attract over 100,000 *more* jobs if it weren't for the fact that we continue to fall short of providing enough affordable homes in desirable neighborhoods. If the region could build 13% more homes than this plan calls for over the next generation, we'd have a great chance to bring in 100,000 more jobs for Bay Area residents.