



October 12, 2016

Commissioner Dave Cortese  
Chair, Metropolitan Transportation Commission  
375 Beale Street, Suite 800  
San Francisco, CA 94105

RE: Plan Bay Area 2040 Draft Preferred Scenario

Dear Commissioner Cortese,

The City of Benicia appreciates the opportunity to comment on the *Plan Bay Area 2040 Draft Preferred Scenario*. The City is concerned that the underlying assumptions and forecasts developed by UrbanSim have not yet been explained to our satisfaction. Meanwhile, the plan process has prioritized the land use model over local input. This seems to have led to some inaccurate forecasts that disregard local plans, which might have been avoided had the plan process incorporated traditional outreach to local planning agencies.

For example, the *Draft Preferred Scenario* forecasts zero employment growth in Benicia's two Priority Development Areas, in spite of significant City investments in both PDAs. The City is currently partnering with Solano Transportation Authority to prepare a Transportation Employment Center Plan for the Benicia Industrial Park PDA, which includes underutilized industrial space and a vacant 527 acre industrial-zoned parcel which is expected to be developed within the plan horizon of Plan Bay Area 2040. The City also expects employment to grow within the First Street Downtown PDA, which has benefitted from City, non-profit, and private investments that continue to revitalize Benicia's historic downtown.

The *Draft Preferred Scenario* forecasts that 86% of the region's new job growth through 2040 will occur in the Big Three cities and the bayside corridors, continuing the exceptional trend of the past four years. Only 14% of job growth is forecast for the balance of the Bay Area, including Benicia and the rest of Solano County, a significant decrease from the 25% of jobs forecast for the balance of the region in Plan Bay Area adopted in 2013.

**The City of Benicia is concerned that the *Draft Preferred Scenario* embraces a rapidly worsening jobs/housing spatial mismatch that will strain the region's already overburdened mass transit systems and worsen traffic congestion, while failing to support planned sustainable growth within Solano County's well-structured urban growth boundaries.**

We are also concerned that the *Draft Preferred Scenario* will continue a pattern of residential displacement from the Big Three and bayside corridors to Solano and the other Delta and inland communities, without adequate support for employment growth within these parts of the Bay Area. Further, we fear this approach will push more Bay Area employees to housing outside of the Bay Area, worsening traffic in Solano County and other outer Bay Area communities without producing a corresponding economic benefit. We believe this will further reduce access to local jobs, increase transportation costs, and exacerbate traffic congestion, thus worsening our air quality.

Benicia and Solano's other cities have established a solid framework to control growth and protect farmland and open space. We are poised to accommodate nodal employment growth that will use available highway capacity within Solano County, serve our local communities, and strengthen the region's integrated transit corridors.

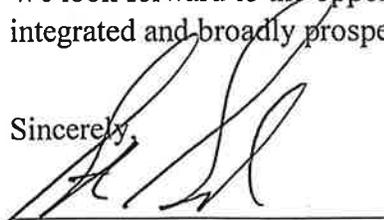
We appreciate the potential of the UrbanSim model, but encourage additional engagement with local elected leadership and planning staff in refining the forecasts included in the *Draft Preferred Scenario*.

We further request consideration of the potential for strategic employment growth in both Benicia and Solano County that reflects our long range plans. We believe that, with regional support, we are well positioned to accommodate companies that are being priced out of the Big Three and bayside corridors but which would prefer to stay in the Bay Area. If we don't focus resources to distribute employment and economic growth to transit connected suburbs and nodal economic centers we will find more jobs leapfrogging the outer Bay Area to relocate to more affordable metropolitan areas.

The *Draft Preferred Scenario* seems to prioritize the role of Solano County and the other Delta and North Bay communities as farm and open space preserves, and bedroom communities to the Big Three. Forecasts for Benicia's PDAs show no growth in spite of clear local expectations and preference for concentrated growth. We have established our urban growth boundaries and created a foundation that can ensure orderly growth, but we do seek that structured growth within the regional framework. Benicia and the other Solano cities have economic development needs and plans, which we strongly urge MTC and ABAG to ensure is reflected in Plan Bay Area 2040.

We look forward to the opportunity to work with you to refine Plan Bay Area 2040 to ensure an integrated and broadly prosperous Bay Area.

Sincerely,



Steve Solomon  
Interim City Manager  
City of Benicia



Christina Ratcliffe, AICP  
Community Development Director  
City of Benicia

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cc:

Mayor Elizabeth Patterson  
Vice Mayor Mark Hughes  
Councilmember Christina Strawbridge  
Councilmember Alan Schwartzman  
Councilmember Tom Campbell

Benicia Planning Commission  
Benicia Community Sustainability Commission

Ms. Julie Pierce, President, ABAG Executive Board  
MTC Commissioner James Spering  
Mr. Ken Kirkey, MTC Planning Director  
Ms. Miriam Chon, ABAG Director of Planning & Research  
Mr. Steve Heminger, MTC Executive Director  
Solano County Supervisor Linda Seifert, ABAG Delegate