



September 30, 2016

Ken Kirkey
Director, Planning
Metropolitan Transportation Commission
Bay Area Metro Center
375 Beale Street, Suite 800
San Francisco, CA 94105

Miriam Chion
Director of Planning and Research
Association of Bay Area Governments
375 Beale Street Suite 700
San Francisco CA 94105

Re: Plan Bay Area 2040: Response to Draft Preferred Scenario

Dear Mr. Kirkey and Ms. Chion:

Two years ago, in July of 2014, the City of Brentwood adopted a comprehensive update of its General Plan. The timeline of this plan coincides with the 2040 forecast horizon for Plan Bay Area 2040.

The Draft Preferred Scenario forecast compares to the General Plan as follows:

	Households	Employment
Brentwood General Plan	27,849	33,800
Draft Preferred Scenario	29,700	12,150

The Draft Preferred Scenario household forecast is a modest seven percent higher than the General Plan. It is entirely plausible that, over time, the City could approve general plan amendments which increase density and result in a household buildout total close to the Draft Preferred Scenario number.

According to the East Bay Economic Development Alliance, the total number of jobs currently in Brentwood is 12,463 (Q3 2016), 313 jobs higher than the Draft Preferred Scenario forecast for the year 2040. Plan Bay Area 2040 therefore projects Brentwood to

have negative jobs growth in the next quarter century. We seriously question the basis and reasoning for this forecast.

We are also perplexed as to how the Draft Preferred Scenario could be so extremely inconsistent with a locally prepared, locally adopted General Plan: 178 percent lower, precisely.

This is not the first time we raised this concern. Plan Bay Area 2012 also severely underestimated future employment growth for Brentwood. Our 2012 comment letter indicated that unrealistically small job growth projections for east Contra Costa County will worsen already severe traffic congestion on regional roadways and thereby increase GHG emissions. The 2012 letter stated:

... The City supports the reduction of gashouse gas emissions and the associated goal of decreasing freeway congestion, but to severely limit the ability of suburban communities like Brentwood to provide needed jobs – which furthers the intent of Plan Bay Area – is unrealistic and short-sighted. While Brentwood is not currently served by direct rail transit, increased job growth needs to be a priority so that residents are not forced to commute to inner Bay Area job locations. A more realistic approach would be to assume that many people prefer the single-family housing lifestyle over higher density development, and to find a reasoned and balanced means to acknowledge and accommodate that preference into the Strategy. The City suggests that both ABAG and MTC include higher job growth for the cities in east Contra Costa County as a means of reaching target emission goals and accommodating housing preference.

The City respectfully requests that the Draft Preferred Scenario be revised to significantly increase the projection for future jobs growth in east Contra Costa County, consistent with local general plans. Thank you for this opportunity to comment. If you have any questions, please let me know.

Sincerely,



Casey McCann
Community Development Director

cc: Mayor and Council Members – City of Brentwood
Planning Commissioners – City of Brentwood
Randell H. Iwasaki, CCTA Executive Director