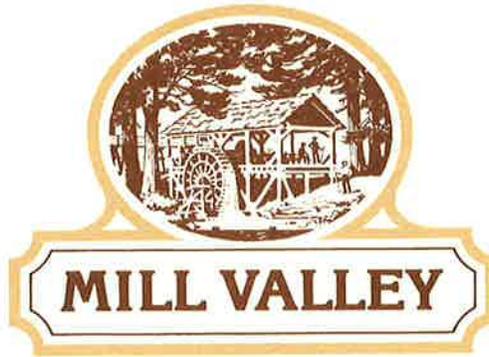


Rec'd 8/10
cc to Ellen, Julie,
Adam, Matt



John McCauley
Mayor
Jessica Sloan
Vice Mayor
Stephanie Moulton-Peters
Councilmember

Jim Wickham
Councilmember
Sashi McEntee
Councilmember
James C. McCann
City Manager

August 1, 2016

Miriam Chion
Director of Planning & Research
Association of Bay Area Governments
Bay Area Metro Center
375 Beale Street, Suite 800
San Francisco, CA 94105-2066

Ken Kirkey
Director of Planning
Metropolitan Transportation Commission
375 Beale Street, Suite 800
San Francisco, CA 94105-2066

RE: Plan Bay Area –2040 Projections and Scenarios

Dear Ms. Chion and Mr. Kirkey,

This letter is in regard to the draft 2040 Projections and Scenarios developed as part of the Plan Bay Area Update.

The City of Mill Valley has reviewed the projections data and attended the June 4, 2016 Open House in Corte Madera, and would like to submit the following comments for your review and consideration:

Projections:

- **Plan Bay Area 2013 projections for 2040.** At the Open House, MTC staff discussed the prior forecasts, and acknowledged that projections contained in Plan Bay Area 2013 have been the most accurate. With that in mind, and the fact that forecasting tends to run on the conservative side, staff suggests starting with the 2040 Assumptions generated in Plan Bay Area 2013 as a benchmark for projections used in this Update.
- **Plan Bay Area 2040 Methodology.** Please provide detailed information explaining how the projections were assigned to each jurisdiction within Marin County. In general, the household and job numbers that are presented in the draft projections and scenarios exceed the growth that expected in Mill Valley due to available undeveloped land; site constraints (flooding and hillside topography); historic employment patterns; and land use

policies and regulations. The City has not, and continues to expect to see relatively slow development, which mainly consist of renovation and remodeling of existing homes. The City has not seen, and does not anticipate a significant change in the type of commercial development, nor do the City's land use regulations support intensification or expansion of commercial areas.

- **Mill Valley Household Growth Forecast: Base Year vs. No Project.** There seems to be some sort of disconnect as Mill Valley's household growth is disproportionate to any other jurisdiction in terms of the no project scenario. Please explain why.
- **Mill Valley Jobs Forecast.** The City of Mill Valley has four commercial areas, all of which are built-out. The largest commercial uses generated in Mill Valley are for food establishments, professional services and general office space. Renovations to the commercial areas in Mill Valley has resulted in changes of use but have not resulted in a change the total square footage of the City's commercial area, which equals approximately 4.5 million square feet. Mixed use buildings are also conditionally permitted in commercial areas, which should also be incorporated into assumptions as new commercial square footage cannot be assumed for all building square footages. While some additional employment may be gained through the change of use of commercial space and the large number of persons that work from home in Mill Valley, it is unreasonable to assume the City can accommodate 1,000+ jobs within the next 24 years. Staff is therefore requesting that the jobs projection be reviewed based on the above information.
- **Mill Valley Households Forecast.** The City of Mill Valleys' residential area is mainly built out, with small infill opportunities suitable for small-scale development. This is reflected through recent past census data:
 - 591 additional households from 1980 – 2000
 - Between 2000 and 2010 Mill Valley had a REDUCTION of 63 householdsWhile there are more households living per unit, it is unrealistic to think that Mill Valley will add as many households as it did in the 1980-1990 time period, and as recent historic trends illustrate, there is slow to no new household growth in Mill Valley.

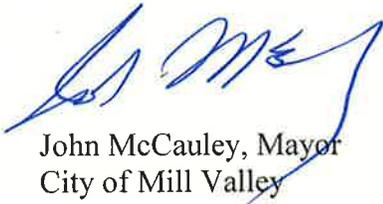
Scenarios:

- **Assumptions.** In Open House materials distributed, the evaluation of scenarios included policy assumptions that should be further discussed. Assumptions and statements discussed in in the materials included the following policy items:
 - inclusionary housing;
 - commercial linkage fees;
 - business subsidies/transit subsidies;
 - second units;
 - tenant protections/displacement;
 - green infrastructure; and
 - open space/preservation funding.

First, MTC/ABAG should confirm with local jurisdictions that they support and are interested in implementing such policies at the local level. This would help to validate/support various scenarios. Second, MTC/AGAG, as part of the implementation of the Plan, should provide technical support to local jurisdictions that would streamline the implementation of such policies by providing best practices; model ordinances; technical studies and/or nexus studies. Local jurisdictions could then craft their own policy based on the tools provided—allowing jurisdictions to maintain local control while being provided additional tools to move important land use policy considerations forward on a regional level. This is especially important, given the limited amount of funding and staff time that small local jurisdictions have to implement these large scale policies, as well as the large cost in conducting the required research and, in some cases, legal nexus, for developing such policies. Once these steps have been made, then MTC/ABAG would be in a better suited to credit each scenario with such assumptions.

- **Projections vs Department of Finance.** The Projections data assumes that some land use restrictions would be eliminated to allow for new units. The Department of Finance does not include such an assumption. Please provide additional information as to why this assumption has been added, and how it impacts the projections.

Sincerely,



John McCauley, Mayor
City of Mill Valley

Cc: Jim McCann, City Manager
Mill Valley City Council