

**Public Comment of Plan Bay Area 2017 Update
by Al Dugan, Novato CA 94947 [] submitted June 30, 2016 via e-mail**

1 This is a comment addressing the Plan Bay Area 2017 Update. It will be critically important that
2 the regional housing allocations for Novato and all of Marin are a match to the General Plans of
3 Novato and all jurisdictions in Marin. California Government Code Section 65300-65303.4
4 require "...each county and city shall adopt a comprehensive, long term general plan for the
5 physical development of the county or city, and of any land outside its boundaries which in the
6 planning agency's judgement bears relationship to its planning." per Section 65300.

7 Code 65302 lays out in great detail the requirements of the general plan. It takes many months
8 and often a year for the jurisdictions to create or update their general plans. The general plans
9 are all encompassing and states, "The general plan shall consist of a statement of development
10 polices and shall include a diagram or diagrams and text setting forth objectives, principals,
11 standards, and plan proposals".

12 The city of Novato has complete a detailed review and analysis of the Plan Bay Area 2017
13 Update proposed range for households and jobs compared to the Novato General Plan. The
14 report and Novato's response was presented at the February 2, 2016 city council meeting. The
15 staff report can be found at
16 http://cms6ftp.visioninternet.com/novato/agendas/pdfstaffreports/cc020216_I-7.pdf and includes
17 the presentation made to the Novato city council by ABAG staff.

18 The review completed by the city of Novato's highest possible household and job projections
19 based on the general plan matches up closely to the lowest of the projection ranges. This would
20 make sense as the Bay Area population (households) and job projections are being driven by the
21 boom in high tech jobs, and accompanying population (household) increases, in the South Bay.
22 One would expect this would be the case for every jurisdiction in Marin County given the fact of
23 the population (households) and job growth in the South Bay.

24 In the case of households, the **low Plan Bay Area 2017 Update** projected households for Novato
25 are **2%** higher than the highest possible projected households based on Novato's General Plan.
26 In the case of the jobs the **low Plan Bay Area 2017 Update** projected jobs for Novato is **9.6%**
27 higher than the highest possible projected jobs based on Novato's General Plan.

28 In the case of households, the **high Plan Bay Area 2017 Update projected households** for
29 Novato are **9.6%** higher than the highest possible projection of households based on Novato's
30 General Plan. In the case of job, the **high Plan Bay Area 2017 Update high projected jobs** for
31 Novato is **31%** higher than the highest possible projection for jobs based on Novato's General
32 Plan.

33 Thus, even the **low Plan Bay Area 2017 Update projection for households** is significantly
34 higher, **9.6%**, than the maximum possible growth per the Novato General Plan.

35 Exceeding the general plan of Novato for housing allocations violates the detailed planning
36 process required by California Code Section 65300-65303.4 completed by the city and can result
37 in a negative impact to the current residents of Novato impacting all aspects of the quality of life:
38 primarily but not limited to traffic, schools, water allocations and public services. The same
39 would be true for all other jurisdictions in Marin.

40 **Conclusion**

41 A reasonable analysis of the proposed Plan Bay Area 2017 Update clearly demonstrates even the
42 low proposed ranges for households and jobs exceed the maximum possible households and jobs
43 projections based on the Novato General Plan. There is no reason to make changes to job and
44 household projections from Plan Bay Area 2013. Increasing either households and jobs, so they
45 exceed maximum projections of the general plans of Novato, and the other jurisdictions of
46 Marin, will have significantly adverse impact on the quality of life in Marin primarily but not
47 limited to traffic, schools, water allocations and public services. The general plans were created
48 per the requirement of California Government Code Section 65300-65303.4 and regional
49 allocations should be based on these critical local planning documents.