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October 12, 2016

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RE: PBA 2040 Preferred Scenario Projections

Dear Miriam and Ken:

At its meeting of October 11, 2016 the Novato City Council authorized the following comments related to the Preferred Scenario:

1. There is concern regarding the substantial adjustment to the 2010 base year number of jobs (a 26% increase from the baseline used in PBA 2013). Although this increase has been explained as having resulted from the use of additional data sources, the shift in base year numbers makes statistical comparisons very difficult between planning documents and renders most local general plans, which are frequently based on ABAG projections, substantially out of compliance with the regional assumptions. As we stated in our July 13, 2016 letter, "To provide meaningful feedback, the City needs a better understanding of the data that resulted in the substantial increase in assumed local jobs for the 2010 base year, the deviance between UrbanSim outputs and various data sources for the 2010 base year assumption." Although MTC and ABAG staff have made some attempt to communicate the basis for the change in the baseline numbers, greater efforts at clear communication to local agencies are necessary to fully understand the significant data adjustments.
2. From a regional perspective, the shift away from concentration of jobs and housing in PDAs seems contrary to the plan objectives. Plan Bay Area 2013 allocated 80% of households into PDAs and 70% of jobs. Plan Bay Area 2040 lowers these percentages to 75% and 52% respectively.
3. The assumption that additional subsidies will be provided to create affordable housing in PDAs seems very speculative. With the loss of Redevelopment, the ability of local government to subsidize housing production has been drastically reduced.

Thank you for the opportunity to provide feedback.

Bob Brown, AICP
Community Development Director