



May 30, 2017

MTC Public Information
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San Francisco, CA 94105
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**Subject: Draft Plan Bay Area 2040 and Draft Environmental Impact Report
(City File No. P15-008)**

To whom it may concern:

The City of San Rafael has completed its review of the Draft Plan Bay Area 2040 and Draft Environmental Impact Report (DEIR) and would like to make the following comments:

Comments on Draft Plan Bay Area 2040

1. One Bay Area Grant Program (OBAG). It is stated that OBAG funding over the next four years will be allocated to cities that approve and build housing per the Regional Housing Needs Allocation (RHNA) process. This is concerning as the City of San Rafael does not build housing and cannot control whether a private property owner or developer will construct a project that has received all planning entitlements. As an example, in San Rafael there are two (2) housing projects in the Downtown area (San Rafael's PDA) with a combined unit count of 77 units, 1203 Lincoln Ave. and 809-815B St., which have had active planning entitlements since 2006 and April 2016, but have not been constructed. This prerequisite of qualifying for funds appears to penalize local jurisdictions over a matter for which the jurisdiction has no direct control.
2. Housing Projections. The latest plan shows a further reduction in housing of 600 households since the most recent projections. San Rafael can accommodate the projected additional 2,800 households as projected in Draft Plan Bay Area 2040, which is on track to be consistent with our General Plan 2020 projections.
3. Employment Projections. The Draft Plan Bay Area 2040 Employment Projection is showing an increase of 5,600 jobs for San Rafael. This projection is ambitious given the built environment and constrained transportation network. We are aware that jobs can have large fluctuations in short periods of time and that these projections are not currently tied to anything. However, we believe it is important to stress our concern regarding the ambitious job projection.

Comments on the DEIR

1. Water Demand. The City of San Rafael would like to confirm that the Future Demand (2040) for water by Marin Municipal Water District (MMWD) is accurate. The future demand is showing no change from 2020 despite the projections for Marin (City of Novato excluded as it is served by North Marin

Water District) showing a 7500-household increase and an 11,300-employment increase.

We appreciate the opportunity to review and comment on the Draft Plan Bay Area 2040 and Draft Environmental Impact Report. We look forward to a response to our comments. Should you have any questions regarding the information in this letter please feel free to contact Alan Montes, our Assistant Planner at (415) 485-3397 or email at Alan.Montes@cityofsanrafael.org.

Sincerely,



Paul Jensen
CITY OF SAN RAFAEL
Community Development Director

cc: City Council
City Manager
Public Works Director
Community Development Director
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City Attorney
Economic Development Director