

Pat Eklund

June 1, 2017

ABAG and MTC
375 Beale Street
San Francisco, CA 94105

SUBJECT: Comments on Plan Bay Area 2040 and Draft Environmental Impact Report

After reviewing the PBA, DEIR and many of the supporting documents, following are my major concerns, comments and suggestions:

1. Lack of information and analysis of water availability and reuse. In 2014, the Marin ABAG delegates and alternates requested the 2017 update of PBA include information and an analysis of potable water availability and reuse of wastewater and storm water. Unfortunately, both the Draft PBA 2040 and DEIR do not include adequate information and/or analysis on these areas especially given the anticipated growth in population and jobs.
SUGGESTION: Include a focus area in the “Plan of Action” that calls for a thorough analysis of the Bay Area’s potable water availability long-term (especially given the statewide demand for water and the anticipated population and jobs growth) and the reuse of wastewater and storm water that would be included into the PBA update due in 2021.
2. Unrealistic assumptions. Some of the land use and transportation assumptions in the DEIR are unrealistic and cannot be implemented. Specifically,
 - a. “The region will continue to receive historical levels of public funding for housing production.” (page 31). With the elimination of Redevelopment Agencies, local governments do not have adequate tools available to generate public funds for housing. Without a sustainable fund in the State, it is unrealistic to assume there will be public funds available even for affordable housing in the Region.
SUGGESTION: Eliminate this assumption.
 - b. “Assign higher densities than currently allowed by cities in PDAs;” Cities and Counties self-nominate PDA’s along with the applicable density. This assumption implies that either ABAG or MTC will ‘assign’ a higher density which is counter to the concept of local control and that PDA’s are self-nominated.
SUGGESTION: Eliminate this assumption.
 - c. “Assume for-profit housing developments make 20 percent of units deed-restricted.” Many cities and counties do not have inclusionary zoning requirements or even a requirement for 20% of the housing units to be affordable, but allow housing developers to pay ‘in-lieu’ fees which are inadequate to actually produce the housing units.
SUGGESTION: Change this assumption to 50% of the cities and counties (or the actual percentage, if known) have 20% inclusionary zoning requirements.
 - d. “Assume subsidies stimulate housing and commercial development within PDAs”. It is unclear to me why this assumption is included especially for commercial development which usually is developed without subsidies. In addition, this assumption does not identify who provides the subsidies, what the

subsidies would be and whether they would be adequate to stimulate housing and commercial development.

SUGGESTION: Eliminate this assumption unless specific subsidies are identified, available and can demonstrate they are adequate and needed for both housing and commercial development.

3. The Draft EIR and PBA does not adequately address the serious role of water quality and supply and health of San Francisco Bay and Estuary (including wetlands, habitat, etc..). The goals and actions in the approved 2016 CCMP provide a comprehensive set of policies that should be included in the Plan Bay Area.
SUGGESTION: Include a specific objective in the Plan of Action focused on the goals and objective of the 2016 CCMP. In addition, the objective in the Plan of Action should outline how the goals, objectives and policies of the CCMP will be incorporated into the Plan Bay Area update in 2021.
4. In some parts of the Bay Area, sea level rise is already impacting transportation routes (e.g. Highway 37) and housing/commercial developments.
SUGGESTION: Since some PDA's and TPA's are within the 100-year flood zone and may be impacted by sea level rise, there needs to be a more detailed analysis of the feasible improvements and associated costs.
5. Highway and road improvements continue to lag primarily due to lack of funding.
SUGGESTION Consider devoting a higher percentage of funds to infrastructure improvements specifically for highway and local streets and road improvements.
6. UrbanSim model may not be appropriate for land use given its inability to incorporate specific zoning policies of the 101 cities & 9 counties in the Bay Area.
SUGGESTION: Work with the ABAG Regional Planning Committee to consider and evaluate other land use models that may be more appropriate and/or changes to UrbanSim to allow for more flexibility in the parameters.

Thank you for the opportunity to comment and make suggestions. I appreciate all of the hard work done to create a readable PBA and the 15+ specific technical documents including the DEIR. I hope that in the future, more time will be given to allow the public, local governments and stakeholders an opportunity to review and comment on the materials. I think that a timeline needs to be developed in 2017 for the 2021 PBA which incorporates more time for reviewing the draft and the final prior to adoption.

If you have any questions, please feel free to contact me at home [REDACTED].

Sincerely,



Pat Eklund
Council Member, City of Novato