May 31, 2016

Ken Kirkey  
Director, Planning  
Metropolitan Transportation Commission  
Bay Area Metro Center  
375 Beale Street, Suite 800  
San Francisco, CA 94105

Re: Draft Environmental Impact Report (Draft EIR) (SCH# 2016052041) for Plan Bay Area 2040 and the Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS) for the San Francisco Bay Area

Dear Mr. Kirkey:

Thank you for the opportunity to comment on the Draft Environmental Impact Report (Draft EIR) (SCH# 2016052041) for Plan Bay Area (PBA) 2040 and the Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS) for the San Francisco Bay Area. We have initiated communication with your office to discuss the projections for the Town of Hillsborough over the last several months, and were pleased to have the opportunity to discuss the issue with a Metropolitan Transportation Commission (MTC) representative on May 26, 2017.

We continue to detect discrepancies between both the 2010 and 2040 employment figures. Hillsborough is a single family residential community with no commercial zoning. Non-residential uses in Hillsborough are limited to schools, country clubs and government facilities which employ a total of approximately 600 regular employees. The above noted documents indicate that Hillsborough had 2,100 employees in 2010 and would have 2,300 employees by 2040. These figures appear the same as in the prior Draft documents despite the Town’s October 13, 2016 letter indicating inaccuracies. Following is additional information that may assist in understanding the Town of Hillsborough’s concerns:
The Association of Bay Area Government (ABAG) 2013 projections indicated Hillsborough had 1850 jobs in 2010.

Also, according to ABAG 2013 projections, Hillsborough could expect to lose three percent of its jobs between 2000 and 2025.

The Town of Hillsborough includes two census tracts. The methodology that is referenced in the documents above for projecting Hillsborough's jobs appears to assume that the two tracts have an average of 486 jobs per square mile. While this methodology may be appropriate in a jurisdiction with mixed land uses, the Town of Hillsborough has one single family zoning district.

At the time of preparation of this letter, Hillsborough has licensed 1761 businesses. Historically, of this number approximately half are regular full time jobs and half are home occupations or temporary jobs.

The job growth for Hillsborough within the above documents exceeds those of other predominantly single family residential San Mateo County communities that have commercial zoning districts.

While Hillsborough embraces a strategic approach for advanced planning purposes, we believe that planning with consideration for actual constraints is the appropriate method to stimulate community goals. Aggressive projections can have significant negative environmental impacts to resources such as water, as well as to local community and regional character. We are committed to setting and meeting realistic targets, as well as participating regionally to resolve jobs and housing challenges.

We understand that our community is particularly unique as there are only a handful of communities in the entire State of California that have no commercial businesses whatsoever. We welcome an opportunity to discuss our comments further.

Sincerely,

Elizabeth S.R. Cullinan
Director, Building and Planning
Town of Hillsborough