



Sonoma County Transportation Authority
Regional Climate Protection Authority

October 10, 2016

MTC Chair Cortese and Commissioners
Bay Area Metro Center
375 Beale Street
San Francisco, CA 94105

We understand that the Regional Governments are charged with planning for GHG emissions reductions, improving the regional transportation system, and for encouraging the provision of adequate housing in Plan Bay Area. Plan Bay Area also facilitates the development of the regional transportation project list, which was once the primary plan deliverable to many of the jurisdictions, along with the Regional Housing Needs Allocation (RHNA) numbers.

At the countywide level, we are concerned at the differences between the draft preferred scenario and the adopted Plan Bay Area Sustainable Communities Strategy housing and employment forecast. We observe that housing growth estimates have increased from the previous forecast, and that employment growth estimates have been reduced. We are concerned that higher housing growth which is not accompanied by similar levels of employment growth could increase vehicle trips, trip lengths, and increase countywide and regional VMT and GHG emissions.

We are concerned with the technical accuracy of modeled growth output generated using UrbanSim. We recognize that the processes and tools used for forecasting population, housing and employment and modeling transportation projects are extremely data intensive. While this is not, in itself a bad thing, it should be accompanied by rigorous validation of modeled results and in some cases parcel by parcel verification. Unfortunately, there appear to be many errors in the detailed growth forecasts for Sonoma County parcels that may have the potential, if not corrected, to lead to unreasonable forecasts for Sonoma County jurisdictions. Regional forecasts are often used by local jurisdictions in planning studies and to estimate project and development impacts. These forecasts are also used to develop forecasts which are used by SCTA in the Sonoma County Travel Model, and SCTA would like to continue to ensure that forecasts used in local modeling are consistent with regional forecasts and the regional travel demand model. SCTA also recognizes that forecasts developed for this regional transportation plan may be used to develop future regional, county, and local forecasts which may be used to develop future RHNA allocations, and recommends that this process use a reasonable forecast which has been vetted by local jurisdictions.

We urge MTC and ABAG to continue working with local jurisdictions and CMAs to verify and validate inputs and assumptions that are used by the region growth model UrbanSim. We recommend that MTC/ABAG work with local jurisdictions and SCTA staff to develop reasonable countywide, jurisdictional, and PDA housing and employment forecasts before the final adoption of the Plan Bay Area Preferred Scenario, and that regional planning and modeling staff continue to work with local and SCTA staff to correct detailed modeling inputs and output errors.

Chair David Rabbitt
Sonoma County Transportation Authority