



CITY OF PETALUMA

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October 13, 2016

Miriam Chion, Director of Planning and Research
Association of Bay Area Governments
Bay Area Metro Center
375 Beale Street, Suite 800
San Francisco, CA 94105-2066

Ken Kirkey, Director of Planning
Metropolitan Transportation Commission
Bay Area Metro Center
375 Beale Street, Suite 800
San Francisco, CA 94105-2066

RE: Plan Bay Area 2040 Draft Preferred Scenario Housing and Job
Projections

Dear Ms. Chion and Mr. Kirkey:

The City of Petaluma has reviewed, and wishes to provide comments on, the household and jobs projections prepared for Plan Bay Area 2040.

The September 9, 2016 presentation "Draft Preferred Scenario: Overview of Growth Pattern and Investment Strategy" includes a diagram depicting the evolution of the Draft Preferred Scenario building upon the foundation of *Plan Bay Area 2013*, local general plans, three alternative land use scenarios, public feedback, and finally refinements based on ABAG's Land Use Vision and Priority Development Area (PDA) Assessments.

Petaluma has reviewed the projections prepared for the three alternatives, the Draft Preferred Scenario, GIS data provided by MTC from the UrbanSIM model and the online UrbanSIM web-based map. In reviewing the data it is clear that the 'refinements' or ABAG's Land Use Vision and PDA Assessments are driving the Draft Preferred Scenario with little attention to Plan Bay Area 2013, local general plans, and the prepared alternative land use scenarios.

While the projected buildout of 27,100 households in Petaluma is consistent with the Petaluma General Plan 2025, it is hard to understand how the three alternative land use scenarios which vary between 23,000 and 24,000 households informed a preferred scenario of 27,100 households, an increase of

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3,000 households over the highest alternative scenario. In addition, the policy assumption that 75% of future growth will occur within designated PDAs results in a projected 4,450 households within Petaluma's PDA – an increase of 2,000 households over *Plan Bay Area 2013* and significantly higher than anticipated in Petaluma's planning documents.

Staff reviewed the UrbanSIM data in order to understand where ABAG/MTC expects this growth to occur within Petaluma's PDA, several issues quickly emerged:

- A 39-acre parcel, currently designated for industrial use, is assumed to have the capacity for 3,139 residential units and no jobs. Even with a change in land use, this parcel could not accommodate anything close to that number of units.
- An immediately adjacent parcel assumes 894 residential units and no jobs. This site has already been entitled for 274 dwelling units, 45,000 square feet of office, 30,000 square feet of commercial, and a 122 room hotel.
- A designated future park is assumed to have 98 residential units.
- Two significant and vacant sites immediately adjacent to the commuter rail station, both key transit-oriented development sites identified in the Petaluma Station Area Master Plan, are assumed to have no development.
- The majority of Petaluma's PDA is designated mixed use, yet there is no future job growth assumed within its boundary based on the UrbanSIM data. A review of the data shows a decrease in jobs within the PDA from 2010 to 2040 while the Draft Preferred Scenario shows an increase of 550 jobs.

Outside the PDA boundary there appears to be no job growth beyond recently constructed projects and no accounting for future job growth on significantly sized vacant parcels and projects currently under construction based on review of the UrbanSIM model. The above issues raise questions about the technical accuracy of the UrbanSIM model and the policy assumptions informing the Draft Preferred Scenario.

Petaluma has worked closely with the Sonoma County Transportation Authority (SCTA) to ensure that SCTA's travel demand model includes accurate existing land use data, current development projects, and projected development. It has been our understanding that SCTA's model data has in turn been shared with MTC to inform its model. The use of UrbanSIM appears

to not benefit from that work, resulting in data that is both inaccurate and unrealistic.

Petaluma is supportive of the overall goal of reducing GHG emissions, improving the regional transportation system, and securing a balance between jobs and housing. However, we urge MTC and ABAG to continue working with the CMAs and local jurisdictions to improve upon the UrbanSIM model to ensure a reasonable and realistic housing and employment forecast before adopting a final Plan Bay Area Preferred Scenario.

If you have any questions, please feel free to contact Scott Duiven, Senior Planner, at sduiven@ci.petaluma.ca.us.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read 'John C. Brown', with a long horizontal line extending to the right.

John C. Brown, City Manager