



October 11, 2016

Bay Area Metro Center
Association of Bay Area Governments/Metropolitan Transportation Commission
ATTN: Miriam Chion and Ken Kirkey
375 Beale Street, Suite 800
San Francisco, CA 94105-2066

Subject: City of San Rafael Comments on Plan Bay Area Draft Preferred Scenario (City File No. P15-008)

Dear Ms. Chion and Mr. Kirkey:

Over the past year, the City of San Rafael has been actively following the update to Plan Bay Area 2040. During this process, our staff has reviewed revisions and studies that have been released, and have submitted written comments to ABAG/MTC on behalf of our City.

The latest Draft Preferred Scenario was published in late August 2016 and we have been diligently reviewing the scope of and the growth projections for this scenario to determine the Plan implications on our City. On October 3, 2016, the San Rafael City Council reviewed a report on the Draft Preferred Scenario, including the revised household and employment projections. Following a discussion of the Draft Preferred Scenario, the City Council directed the preparation of this letter with comments. We respectfully submit the following comments:

1. We question the use of 2010 as the base year for modeling input. It is unclear why 2010 was chosen as the base year for the UrbanSim model input. As acknowledged by the information we received from your staff, nearly one-third of the forecast jobs using this base year have occurred as a result of the post-recession employment boom. For this reason, the use of a more recent base year for model input would be more logical and appropriate.
2. Priority Development Area (PDA) Growth Distribution. The scope of the Draft Preferred Scenario presents an adjustment in the growth distribution to PDAs. By comparison to the 2013 Plan Bay Area, the percentage of growth proposed to be distributed to PDAs has been reduced from 80% to 75% for households and from 70% to 52% for jobs. The City of San Rafael supports this change. We are committed to maintain our Downtown PDA and the lower distribution of growth provides a better benchmark for the long-range planning of this PDA.
3. The household projection for San Rafael is reasonable and acceptable. The latest draft projection show a reduction in housing growth of 330 households from those in the adopted 2013 Plan Bay Area. This projection is within the household growth projection range of the current San Rafael General Plan 2020. From 2000 to 2010, our number of households grew by 393 units. By this



account, we can reasonably expect that San Rafael can accommodate the projected growth in households.

4. The 2040 jobs projection growth for San Rafael is ambitious given the built environment conditions and constrained transportation network. While the 2040 jobs projection (growth of 5,800 jobs citywide) presented with the Draft Preferred Scenario has been reduced from the Adopted 2013 Plan Bay Area (by approximately 21% or 1,540 jobs), there is still a significant concern regarding the feasibility to accommodate this projection. As noted in our past comments on Plan Bay Area: a) San Rafael is a built out community with very limited capacity for new commercial growth; and b) the development equivalent to accommodate some of this job growth would require major transportation and utility service infrastructure improvements that exceed our current and planned capacity.

In addition, we understand that a portion of this jobs projection has been realized as a result of the surging job growth in the past several years (result of the recovered economy). However, our staff has not been able to obtain specifics from your staff on this recent job growth in our community; this information would be helpful for the City to better understand and analyze the jobs projection. Lastly, as job growth varies by geographic area, prior to further adjustments in this projection, it is recommended that your staff consult with the Marin Economic Forum. The Marin Economic Forum is an excellent local source on business and employment trends.

We appreciate the opportunity to review and comment on the Draft Preferred Scenario projections. 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 Paul Jensen, our Community Development Director at (415) 485-5064 or email at paul.jensen@cityofsanrafael.org.

Sincerely,

Gary O. Phillips, Mayor
CITY OF SAN RAFAEL

cc: City Council
Planning Commission
City Manager
Economic Development Director
Community Development Director
Marin Economic Forum, 555 Northgate Drive, Suite 255, San Rafael, CA 94903