



CITY OF SAUSALITO

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VIA ELECTRONIC MAIL

May 31, 2017

MTC Public Information
375 Beale Street, Suite 800
San Francisco, CA, 94105
Email: eircomments@mtc.ca.gov

Dear MTC,

Thank you for the opportunity to comment on the Draft EIR for Plan Bay Area 2040. The City of Sausalito appreciates your seeking our local input. We do not agree with Sausalito's projected forecast numbers for households and employment, and respectfully request that further modification be done to revise these forecast numbers to reflect our experience and realistically possible growth.

We reviewed both the Draft and Final Preferred Scenarios and the methodology. We understand that these projections stem from distributing ABAG's economic and demographic forecasts through use of UrbanSim, a regional land use model, and consideration of local plans (General and Specific Plans) and zoning.

Following our input of the Draft Preferred Scenario, your response was that "a number of technical corrections at the parcel-level were made in the Final Preferred Scenario". However, the Final Preferred Scenario now incorporated into the Draft EIR lists Sausalito's household number for base year 2010 as 4,112, and the forecast number for year 2040 as 4,370 – 258 new households -- a slight decrease from 350 as provided in the Draft Preferred Scenario; the employment number for base year 2010 as 5,220, and the forecast number for year 2040 as 5,880 – 660 new jobs – an increase from 600 as provided in the Draft Preferred Scenario! We do not believe the technical corrections at the parcel-level were done accurately as the forecast numbers are still aggressively high and should be reduced based on these factors:

- Sausalito's population of 7,156 (year 2015) has shown an overall decrease from the last three decades, and has been no greater than 7,300 since 1980, according to US Census figures. This population trend decrease is not consistent with the projected 258 new households (with an average of 1.71 persons per household in Sausalito) by year 2040.

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- The description of the methodology for the housing and employment forecasts states that local plans (General, Specific Plans) and/or local zoning were considered. We do not believe that the development density (FAR, allowable intensity) limits as prescribed in the City's General Plan, Marinship Specific Plan, and zoning were factored into the employment projections, nor will they accommodate this level of development. While the City has existing commercial, office, and industrial building development potential, the density (specifically FAR, building coverage, and height) restrictions for any new development in Sausalito's commercial and industrial land use areas do not support the very high projected 660 new jobs by the year 2040.
- The City has recently conveyed over two acres of open space for conservation purposes (conservation easement) that will ensure that the land be maintained as natural open space in perpetuity (APN 64-321-01). The residential land use designation/zoning will be amended as open space designation/zoning. This land area should be removed from the UrbanSim land use modeling and the household projections adjusted (reduced) to reflect this change.
- Sausalito maintains strong historic preservation policies, and has an established Historic Overlay Zoning District that encompasses the entire downtown commercial area as this area represents Sausalito's early town development. Strict rules apply to redevelopment of these historic buildings and its setting. We do not believe that the employment projections factor the development limitations within this commercial land use/zoning district overlay area.
- Sausalito is not designated as a PDA (Priority Development Area). However, we are concerned that the high forecast numbers distributed for Sausalito could be an error of the land use modeling because of Sausalito's adjacency to the neighboring community of Marin City, which is located in the jurisdiction of the County of Marin and is identified as a PDA (Priority Development Area). We request that these jurisdictional boundaries be closely examined and adjusted.
- There is a lack of rationale for the forecast numbers distributed to Sausalito when compared to other cities in Marin County. For example, a comparable town of Tiburon, in terms of size (square miles) and population has a forecast of 90 new jobs by 2040, yet Sausalito has a forecast of 660 new jobs by 2040. Mill Valley is double the size (square miles) and double the population of Sausalito, and yet Mill Valley is forecasted to have 570 new jobs – a lower projection than for Sausalito.

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Please consider the above factors and reduce the households and employment forecast projections for Sausalito and make the necessary modifications to the Draft EIR.

Sincerely,



Danny Castro
Community Development Director
City of Sausalito

cc:

Sausalito City Council

Adam Politzer, City Manager

Lilly Whalen, Assistant City Manager/City Clerk

Mary A. Wagner, City Attorney