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SUBJECT: Comments on Plan Bay Area 2040 Draft Preferred Land Use Scenario for Marin County

Dear Hing and Matt,

Thank you for taking the time on Tuesday, September 27th to answer questions and listen to our preliminary feedback regarding the Plan Bay Area Draft Preferred Land Use Scenario for Marin County. As was discussed on the phone, our comments are provided below as endorsed by the Marin County Board of Supervisors at their October 4, 2016 hearing.

Issues

Staff has identified the following issues regarding the above Draft Preferred Scenario projections for consideration as County comments to MTC and ABAG.

Household Projection for Unincorporated County. The Preferred Scenario projects 3,150 new households for the unincorporated county between 2010 and 2040, or an average of 105 new households per year. In contrast, review of the County's annual Housing Element reports indicates that an average of 30 units of housing have actually been produced in the unincorporated county between 2010 and 2015. This annual average housing production number extrapolates to approximately 900 housing units over the 30 year (2010-2040) timeframe of Plan Bay Area. While expanding the supply of affordable housing is an important priority for the County, the recent post-recession trend of housing production suggests that the Draft Preferred Scenario projection for households in the Unincorporated County may outpace the actual number of new households developed in the Unincorporated

County by 2040. For that reason, staff recommends retaining the projected number of new households for the unincorporated county (1,390) included in the current Plan Bay Area as opposed to the over 3,000 households presented in the Preferred Scenario.

Households Projection for Unincorporated County PDA. The Draft Preferred Scenario projects 550 new households for the Unincorporated County PDA, up from the 520 new households projected in the current Plan Bay Area. Although marginal, this upward adjustment does not on the surface correlate with a reduction in households one would expect to see with the substantial contraction of the PDA that occurred *after* the current Plan Bay Area was approved. Based on current land use plans and zoning for the PDA, staff recommends a lower household projection of 300 units, half of which are reflected by the Housing Overlay Designation for the Marin City Gateway Shopping Center. This comment does not address, nor would it affect, future plans for revitalization of the Golden Gate Village neighborhood.

Job Growth for Unincorporated County. Employment growth in the current Plan Bay area expands by 2,980 jobs for the Unincorporated County, from 27,450 to 30,600 jobs between 2010 and 20140. The employment projection increases to 3,850 new payroll and self-employed jobs in the Preferred Scenario. Staff examined the Draft Preferred Scenario through the local lens of information and data published in the Marin Economic Forum Economic Bulletin (2015). The Bulletin shows that Marin as a whole is projected to add roughly 8,000 new payroll jobs between 2015 and 2018 (this number excludes projected self-employed jobs). According to MEF, actual employment growth increased by 2,900 new jobs in 2015. Staff recommends that MTC/AGAB staff consult with the Marin Economic Forum prior to finalizing the Preferred Scenario job growth projection. County staff is available to facilitate that consultation.

Job Growth for Unincorporated County PDA. With respect to employment projections in the PDA, the 2010 base year figure of 650 jobs in the Preferred Scenario may not accurately reflect existing conditions. For example, the 2012 Economic Census of the United States indicates 321 employees in the Marin City Census Designated Place (CDP). The Census Bureau's "OnTheMap" web-based mapping and reporting application, which shows where workers are employed and where they live, indicates there were a total of 218 jobs in the Marin City CDP in 2010 and 411 in 2014. Combining these two data sources helps to paint a more realistic picture of the PDA's actual employment as a basis for refining the Draft Preferred Scenario. While the PDA also includes California Park in unincorporated San Rafael, this particular area is primarily residential and does not have an employment base. Therefore, 650 base year jobs for the PDA appear to be excessive, which also calls into question the forecast for 750 jobs that are projected from the base year. However, the increment of 100 new jobs over the 30-year forecast period for Plan Bay Area appears more reasonable based on an optimistic assumption of economic growth in the Marin City community.

In addition to the above comments pertaining to household and job numbers, it would be helpful to provide a thorough explanation about the assumptions used to generate the UrbanSim model and the extent to which they take into account local conditions, such as sea level rise, and policies that may have a bearing on future development and economic growth potential.

We hope this feedback is useful towards refining the Draft Preferred Scenario.
Please feel free to contact us for further clarification.

Sincerely,



Kristin Drumm
Senior Planner



Brian C. Crawford
Director

cc. Marin County Board of Supervisors

