

**SUSTAINABLE TAMALMONTE  
215 JULIA AVENUE  
MILL VALLEY, CA 94941**

June 25, 2016

ABAG & MTC

[info@planbayarea.org](mailto:info@planbayarea.org)

Re: Comments on Plan Bay Area Update 2017

Dear ABAG and MTC,

Per your request, below are our comments and recommendations regarding the Plan Bay Area Update 2017.

If we could only choose one of the 4 scenarios offered at your Plan Bay Area Update workshop, then the "Big Cities Scenario" would probably be the best choice. The "Big Cities Scenario" would require Marin County to plan for the least amount of population growth and housing and is the most similar to Marin's historic growth. Still, the "Big Cities Scenario" reflects a 10% population growth over 30 years, which is approximately .3% growth per year. Whereas Marin Census data for 2011 showed that Marin's population grew 2.1% in the previous decade (primarily in Novato), roughly only .2% growth per year. Marin Census data showed that between 2010 and 2015, there was an uptick in the growth rate to an average of .7% growth per year but this rate should decline significantly because Marin County lacks developable land and has limited availability of water resources.

However, rather than move forward on a predetermined scenario, we urge you to backtrack and start anew on the Plan Bay Area Update 2017.

The Plan Bay Area Update 2017 is very similar to the original Plan Bay Area, adopted in 2013. This is unfortunate due to the many failings of the 2013 plan. In order to improve the plan, we recommend that you start over and repeat three essential steps: 1) Reanalyze the failures of Plan Bay Area 2013 to better understand what needs to be corrected; 2) Set appropriate objectives to achieve the best outcome for the upcoming update; and 3) Redesign Plan Bay Area so that it achieves the new objectives.

**A. REANALYZE THE FAILURES OF PLAN BAY AREA 2013**

To understand the flaws of Plan Bay Area 2013, we encourage you to read the attached report entitled; "The Truth About Plan Bay Area", which is a critical analysis of the original 2013 version of the regional plan. *\*\*Please note that the*

*article was written in June, 2013 and since then, a number of areas in Marin were removed from the Hwy 101 Corridor Priority Development Area.*

## **B. SET APPROPRIATE OBJECTIVES FOR THE PLAN BAY AREA UPDATE 2017**

Most importantly, the priorities you have set do not align with the well being of the Bay Area and in particular Marin County. Instead, we urge you to adopt the following list of 15 objectives as you make planning decisions pertaining to the Plan Bay Area Update 2017:

- 1. Promote and maintain local control of land use decisions including planning and zoning;**
- 2. Encourage use of realistic and credible population, housing and jobs projections that clearly articulate assumptions, modeling and rationale.**
- 3. Advocate for more effective public and local agency engagement through out the process.**
- 4. Promote acknowledgement of resource limits especially for water availability.**
- 5. Work to reduce GHG emissions within each jurisdiction's control by implementing Climate Action Plans and/or additional measures as determined appropriate by local government.**
- 7. Recognize That There Is An Ultimate Limit To Growth.** The total projected build-out, allowed by Marin County's and Marin Cities' general plans, exceeds the capacity of Marin's infrastructure, public services and utilities, and environment. This is demonstrated by the findings of the 2007 Countywide Plan's EIR, which concludes that "land uses and development consistent with the 2007 Countywide Plan would result in 42 significant unavoidable adverse environmental impacts". Therefore, it is important for Marin County and Cities to recognize that there is an ultimate limit to growth and work together to reduce the total projected build-out of city and county general plans to a level that is sustainable. Plan Bay Area should respect this sustainable growth limit.
- 8. Debunk the false assumption that developing housing and jobs near transit (Transit Oriented Development - TOD) lowers Green House Gases.** Per SB 375, Plan Bay Area (2013) was supposed to lower per capita auto and light truck Green House Gas emissions by 15 percent and bring the Bay Area back to 1990 levels by the year 2040. According to Plan Bay Area's Environmental Impact Report, in 2010, residents of the Bay Area produced 48.8 trillion tons of carbon-dioxide-equivalent greenhouse gases. The California Air

Resources Board (CARB) greenhouse gas plan, mainly because of the Pavley standards, would reduce this by 11 percent to 43.4 trillion tons by 2040. The Metropolitan Transportation Commission's climate initiatives, which would promote electric cars, carpooling, and similar programs, would reduce emissions another 3 percent to 41.8 trillion tons. All of the other land-use and transportation programs, including transit initiatives, in Plan Bay Area (with great fiscal and environmental cost) would reduce emissions by less than 1 percent, to 41.3 trillion tons (equivalent to a rounding error).

**9. Prohibit planning for housing in hazardous and constrained locations.**

Acknowledge and work to reduce the significant unavoidable adverse environmental impacts that would result from implementation of Plan Bay Area. Remove proposed housing from areas where the development would result in significant unavoidable adverse environmental impacts.

**10. Acknowledge that people who live in close proximity to major roads and freeways are at much greater risk of developing serious chronic illnesses** (E.g. Heart disease, stroke, lung impairment, autism, asthma, miscarriage/ low birth weight, cancer, etc.). In so doing, work to halt plans for housing near major roads and freeways.

**11. Work to ensure that all multifamily housing will receive full CEQA review without streamlining or exemptions.** Eliminate SB 375's Transit Priority Project (TPP) Corridors and SB 743's Transit Priority Areas in Marin. Otherwise, work to prevent housing in Marin from being located in TPP Corridors and Transit Priority Areas.

**12. Promote building reuse in order to retain existing affordable housing, to convert market rate housing to affordable housing, to reduce development costs, and to reduce environmental impacts.** Acknowledge that building reuse almost always offers environmental savings over demolition and new construction. Moreover, it can take between 10 and 80 years for new energy-efficient building to overcome, through more efficient operations, the adverse climate change impacts that were created during the construction process.

**13. Remove/Reject transportation funding strings that tie transportation funding to increasing development potential or that tie transportation funding to targeting housing near transit.** The costs related to dealing with the adverse environmental impacts caused by overdeveloping our county far outweigh the incentives (E.g. Transportation Funding) attached to compliance or penalties attached to noncompliance of Regional Housing Needs Allocations (RHNA's), other State laws and regional plans/programs (E.g. Plan Bay Area) that increase development potential.

**14. Count all conversion units, assisted living units, second units, junior units and inclusionary units toward the RHNA quota.**

**15. Work to prevent increased development in one Bay Area jurisdiction from impacting another neighboring jurisdiction.**

### **C. CONCLUSION**

We urge you to start again on the Plan Bay Area Update 2017 and make significant changes to the original Plan Bay Area 2013 to bring about a regional plan that promotes local control; accommodates realistic and sustainable population and job projections; upholds community character; respects the limits of Marin's and other Counties' infrastructure, public services and utilities, financial capabilities, and natural habitat; protects the environment and public health and safety; supports local economic vitality; and enhances quality of life.

We further urge you to use the attached article and above listed objectives to help guide your planning decisions regarding the Plan Bay Area Update 2017.

Thank you in advance for your conscientious consideration.

Very truly yours,

/s/

Sharon Rushton

Chairperson

**Sustainable TamAlmonte**

Attachment