

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

October 1, 2016

Marin County Board of Supervisors
Marin County Open Space Board of Directors
3501 Civic Center Drive, #329
San Rafael, CA 94903

Re: Request from the Community Development Agency to authorize staff to submit comment letter regarding Plan Bay Area 2040 Draft Preferred Land Use Scenario for Marin County

Dear Marin County Board of Supervisors,

The Community Development Agency Staff is requesting you to authorize them to submit a comment letter to MTC and ABAG reflective of Staff's recommendations in the Staff Report on the Plan Bay Area Update's "Draft Preferred Land Use Scenario for Marin County". The Draft Preferred Scenario is an updated forecast for Unincorporated Marin's household and employment growth by the year 2040. We urge you to direct Staff to submit a comment letter that incorporates our below recommendations regarding this forecast.

The Draft Preferred Scenario projections of Marin County households and employment are even greater than the projections of the original Plan Bay Area adopted in 2013. Yet, most critics of the original 2013 Plan Bay Area found that the plan's growth projections were unrealistic and much too high.

Table 2 Draft Preferred Scenario for Marin County

		Households			Employment		
		2010	2040	Change	2010	2040	Change
Draft Scenario	Unincorp Co	27,450	30,600	3,150	17,500	21,350	3,850
	Unincorp Co PDA	1,500	2,050	550	650	750	100
Adopted PBA	Unincorp Co	26,190	27,580	1,390	16,380	19,360	2,980
	Unincorp Co PDA	4,290	4,810	520	2,260	2,960	700

I. HOUSEHOLDS PROJECTION FOR UNINCORPORATED COUNTY

Staff recommends lowering the Draft Preferred Scenario household projections for Unincorporated Marin. However, we do not believe that Staff lowers the projections enough. Staff recommends lowering the Draft Preferred Scenario household projections for Unincorporated Marin to the projection of the original Plan Bay Area adopted in 2013. However, based on information from County Staff reports and from the State Department of Finance (DOF), we determined that these projections were too high back in 2013. The 2013 projections are still too high.

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 extrapolates to approximately 900 housing units over the 30 year (2010-2040) time frame of Plan Bay Area. Yet, instead of recommending 900 units as the projected number of households for the Unincorporated County, Staff recommends retaining 1,390 units as the projected number - the same number used in the 2013 plan.

Recommendation:

Direct Staff to recommend reducing the projected number of new households for the Unincorporated County from the over 3,000 households presented in the Draft Preferred Scenario to 900 households, which reflects the County's most recent annual average housing production.

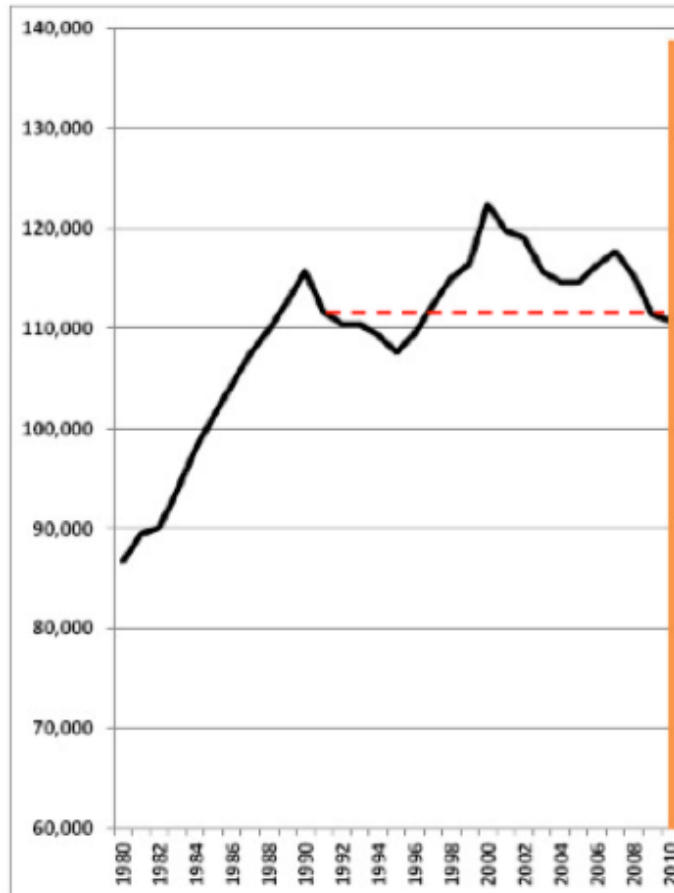
II. JOB GROWTH FOR UNINCORPORATED COUNTY

Regarding Job Growth projections for Unincorporated Marin, Staff recommends that MTC and ABAG consult with the Marin Economic Forum prior to finalizing the Preferred Scenario job growth projection.

The Draft Preferred Scenario forecasts 3,850 new payroll and self-employed jobs for the Unincorporated County, from 17,500 to 21,350 between 2010 and 2040. This equates to about 20% employment growth by 2040, or about .7 % (2/3rd percent) per year. This does not coincide with Marin's historical employment growth.

From 1980 to 2010, employment growth for Marin County as a whole was 16%, or about .5% (one-half) percent per year. However, job growth in Marin was substantial only from 1980 to 1990. In 2011, employment levels were about the same as they were in 1990, with a consistent decrease from 2000 to 2011.

Marin County Payroll Employment 1980 to 2010



Sources: Bureau of Labor Statistics (BLS)

From 2011 to 2015, Marin County had an uptick in new employment. According to the California Department of Transportation's Marin County Economic Forecast, Marin County as a whole had 100,900 wage and salary jobs in 2011 and 112,000 such jobs in 2015. This was an increase of 11,100 jobs in 4 years, or an annual employment growth rate of about 2.8% per year.

California Department of Transportation Marin County Economic Forecast:

- YEAR 2011: 100,900 Wage and Salary Jobs in Marin County
http://www.dot.ca.gov/hq/tpp/offices/eab/socio_economic_files/2011/Marin.pdf
- YEAR 2015: 112,000 Wage and Salary Jobs in Marin County
http://www.dot.ca.gov/hq/tpp/offices/eab/socio_economic_files/2015/Final%20Forecasts/Marin.pdf

However, it is unlikely that the high annual job growth between 2011 and 2015 will be sustained for much time. Marin County lacks the type of developable land associated with the business growth of the 1980s, and has limited availability of water resources. Marin's growing population of seniors will retire or not be fully employed, which will also contribute to lower employment levels.

Recommendation:

MTC and ABAG have a history of inflating population, household, and employment growth projections. Rather than direct MTC and ABAG to consult with the Marin Economic Forum, County Staff should consult with the Marin Economic Forum instead. Then, Staff should develop their own job growth projections, keeping in mind Marin's limited developable land and water resources, and its growing population of retirees.

While completing their analysis, Staff should also investigate: how far away the employees, who filled the most recent new jobs, live from their work place (Do they already live in Marin?); how often the employees work from home; and what portion of the new jobs require regular travel to customers' locations. There is a growing trend of employees working three or four days per week from home and only having to travel to their main work place one or two days per week. A traveling salesperson or a traveling contractor, with many different clients located in different areas, would rarely be able to live close to where they work. Just because a new job is created in Marin, doesn't mean a new household is also needed in Marin in order to lessen commutes.

III. OVERALL GROWTH FOR MARIN COUNTY

Staff concludes and accepts that Plan Bay Area's forecasted household and employment growth for Marin is consistent with Marin's historical growth rate of approximately 1 percent per year.

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 population 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. Moreover, Marin County and Cities have not been able to mitigate the adverse impacts, like traffic congestion, caused by our current population. It seems unrealistic to assume that Marin would or should sustain a growth rate of 1 percent per year.

IV. POPULATION, HOUSEHOLD, AND JOB GROWTH PROJECTIONS SHOULD TAKE INTO ACCOUNT SUSTAINABILITY

When calculating population, household and employment growth projections, the County shouldn't assume that repeating the growth we have had in the past is acceptable. The County needs to delve deeper and evaluate whether or not the County should grow and if so, to what degree and when.

When have we reached the limits of growth? Today, Marin's infrastructure (E.g. Congested roads) and public services (E.g. Overcrowded schools) are insufficient to meet the needs of the current population. Moreover, the County currently lacks the necessary funds to properly improve our infrastructure and public services. The 2007 Countywide Plan's (CWP) Environmental Impact Report (EIR) found that land uses and development consistent with the CWP would result in 42 Significant Unavoidable Adverse Environmental Impacts, including but not limited to:

- Unacceptable Level of Service (LOS) on many roads and numerous other significant project and cumulative traffic impacts;
- Inconsistency with Bay Area Air Quality Management District (BAAQMD) Thresholds;

- Reduction of existing wildlife natural habitat, contribution to habitat fragmentation, and obstruction to wildlife movement opportunities;
- Exposure of people, new development and redevelopment to substantial adverse seismic effects, including the risk of loss, injury, or death involving strong seismic ground shaking, ground failures, and ground surface ruptures;
- Exposure of people and structures to adverse effects of landslides, including the risk of loss, injury, or death from slow or rapid gravity driven earth movement;
- Water supplies that would be insufficient to serve some of the Unincorporated and Incorporated areas in normal rainfall years. So, although the Marin Municipal Water District's 2015 Urban Water Management Plan projects enough water supply to meet demand for the next 25 years or more, there isn't enough water for the total allowable buildout, already allowed by Marin County and Cities.

Should we encourage growth with excessive growth projections and exacerbate these deficiencies further or should we stop or slow growth until we can solve our current problems?

New development in Marin County should only occur if it can be done in a manner that upholds community character, respects the limits of our infrastructure (E.g. roads), public services (E.g. schools), financial capabilities, and natural resources (E.g. water); protects the environment and public health and safety; and enhances quality of life. Growth forecasts should take into account these constraints and considerations.

V. CONCLUSION

We urge you to authorize the Community Development Agency Staff to submit a comment letter to MTC and ABAG reflective of our above recommendations regarding the Plan Bay Area Update's "Draft Preferred Land Use Scenario for Marin County".

Thank you in advance for your conscientious consideration.

Very truly yours,

/s/

Sharon Rushton

Chairperson

Sustainable TamAlmonte