

May 16, 2013



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MARIN COUNTY CALIFORNIA

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Plan Bay Area Public Comment  
Plan Bay Area DEIR Public Comment  
Metropolitan Transportation Commission  
101 Eighth Street  
Oakland, CA. 94607

**Subject: Comments Regarding the Draft Plan Bay Area and the Draft EIR for Plan Bay Area**

This letter transmits the Corte Madera Town Council's comments regarding Draft Plan Bay Area and the Draft Environmental Impact Report (DEIR) for Plan Bay Area.

**Below is a list of our comments on the Draft Plan Bay Area:**

1. The Plan Bay Area assumes regional population growth of 2.147 million by the year 2040. These projections substantially differ from the population projections recently published by the State Department of Finance (DOF). DOF forecasts a 3% population growth for Marin for 2040, which is 10% lower than the ABAG forecasts of 13% growth. Since the entire plan is driven by population growth forecasts, it is critical that these forecasts be substantiated by factual projections. In addition, the Town Council strongly recommends that forecasts be updated every four years at the time the next update to Plan Bay Area is reviewed.
2. The Draft Plan is predicated on an unrealistic regional job growth forecast. The projected regional job growth forecasts are too ambitious given the built out environment, constrained transportation networks, and insufficient infrastructure all of which will not accommodate what is being forecast. The projections should be reduced to account for these constraints.
3. The Draft Plan does not adequately address how a policy of encouraging and constructing more medium-high density housing to accommodate population growth will effectively lower Green House Gases (GHG) in the region.
4. The Draft Plan implies that there will be CEQA exemptions and/or streamlining for future high density housing. The Town Council of the Town of Corte Madera is strongly opposed to any automatic CEQA exemptions or streamlining for future residential development projects as defined in Senate Bill 375. We request that the Plan

Plan Bay Area document clearly and unambiguously state that local jurisdictions shall retain the authority to determine the scope of CEQA review for all subsequent residential development projects.

5. Given the changes in demographics and increasing need for senior housing, there needs to be recognition and acceptance at the State level of the different kinds of housing that qualify as a "unit" for RHNA purposes, and these qualifying units need to be incorporated and accepted in the Draft Plan. Seniors constitute an ever-growing portion of our population, however little is being done to accommodate their needs. This is a serious failure of planning and a failure that should not be continued in the Plan Bay Area.

**Below is a list of our comments on the Draft Plan Bay Area DEIR:**

1. Corte Madera is a suburban community. The DEIR does not adequately distinguish between urban and suburban communities, nor does it adequately address the impacts of the potential shift from suburban to urban. The evaluation of Visual Resources should include potential conflicts with the existing built environment, view-sheds and scenic vistas (especially those that are identified in locally adopted General Plans), etc.
2. Public resources and infrastructure (water supply, sewage disposal, schools, public facilities, streets and roads, traffic systems, etc.) limit the amount of potential growth within Corte Madera and all communities in Marin County. There is little if any potential to expand these resources. The DEIR does not adequately analyze and address the effects of the PBA on these limited resources and infrastructure. With regard to water in particular, the DEIR states that supplies will be adequate in years of average rainfall or single-year drought conditions, but fails to address periods of drought longer than one year.
3. The main transportation corridors in many communities consist primarily of highways. The DEIR does not adequately address the effects of concentrating residential development along transportation corridors in close proximity to air pollution, which has been decisively linked to higher rates of autism, asthma, and other health concerns.
4. There is insufficient justification for the failure of the DEIR to address four potential impact categories (Hazardous Materials, Public Services, Recreation & Mineral Resources) given the fact that all other standard categories are intended to be addressed.
5. It is unclear why MTC's PowerPoint description of Alternative 5 (Environment, Equity and Jobs) stated there will be a Land Use evaluation of "Additional affordable housing in locations with high-performing schools and local services". It needs to be explained how this evaluation can take place if Public Service is one of the categories that will not be addressed.

6. We emphasize the importance of evaluating the potential conflict with locally adopted General Plans as called for under Land Use, Housing Agriculture and Physical Displacement, and feel that the DEIR inadequately addresses this conflict.
7. Land Use, Housing Agriculture and Physical Displacement also inadequately addresses how other housing types may be "crowded out" by typical multi-family development anticipated by the Project. Examples of other housing types should include Assisted Living Units, Homeless Shelters, Women's Shelters, Live/Work Lofts, Section 8 Units, Small Starter Condominiums, and Small Starter Single Family Homes/Bungalows.
8. The DEIR states that "the proposed Project and Alternatives evaluated in the EIR must be financially constrained to the \$277 billion envelope." However Alternatives 1, 4 and 5 do not include analysis using the Preferred Transportation Investment Strategy, which is financially constrained to \$277 billion. This should be either corrected or explained in the document.
9. The DEIR should clarify that the Project and all Alternatives (except Alternative 4) will be analyzed using the same growth forecasts, i.e. 2,147,000 new people, 1,120,000 new jobs, 660,000 new housing units. Demographic and economic forecasts should be included in the Draft EIR.

The Town Council of the Town of Corte Madera appreciates the opportunity to comment on the Draft Plan Bay Area and the DEIR for the Plan Bay Area, however it believes the public comment period for the very lengthy draft documents was inadequate to give the public and stakeholders sufficient time to review the complex information contained therein. Therefore, the Town Council of the Town of Corte Madera requests that the Association of Bay Area Governments and the Metropolitan Transportation Commission delay adoption of Plan Bay Area and the Draft EIR for a period of six months to allow for thorough review by the public. Barring an extension of time for review, the Town Council of the Town of Corte Madera advises that "No Project" be adopted until such time as the provisions of Plan Bay Area can be adequately analyzed.

Sincerely,



Diane Furst, Mayor Town of Corte Madera

Cc: Ezra Rapport, Executive Director, Association of Bay Area Governments  
Pat Eklund, Mayor, City of Novato  
Dianne Steinhauser, Executive Director, Transportation Authority of Marin  
Katie Rice, Marin County Supervisor  
Steve Kinsey, Marin County Supervisor