Appendix C:
Attachments from Agency Comments

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Town of Los Altos Hills Employement Survey 2013

Organization	# FTE
Beth Am Synagogue	24
Bullis Garnder School	38
Daughters of Charity	34
Foothill College	350
Fremont Hills Country Club	20
Pinewood School	40
Poor Clares	16
Purisimma Hills Water District	9
St. Nicolas School	30
Town of Los Altos Hills	20
Home Occupations	71
TOTAL	**652**

Prepared by Los Altos Hills Planning Department, May 2013

Debbie Pedro

From: Jason Munkres [JasonM@abag.ca.gov]
Sent: Friday, May 10, 2013 12:55 PM
To: Debbie Pedro
Cc: Hing Wong
Subject: Los Altos Hills Jobs

Debbie,

As a follow up to our conversation, I looked into the NETS data as you requested. I did find one suspicious entry that was similar to the example we talked about: listed as 2 employees in 1990, 1995, 2000, 2005, and then 1,110 in 2009. While that is certainly not impossible, the address lists them on Byrd Lane, off of Natoma Rd, which is a large lot single family residential area. It is also a travel agent, which I believe unlikely to have 1,100 employees; and though it is possible they manage that many employees, I find it even more unlikely that they work at that location.

The company is listed as:
Idea Travel Company
13145 Byrd Ln, Ste 101
Los Altos (I checked - no Byrd Ln in Los Altos)
CA, 94022

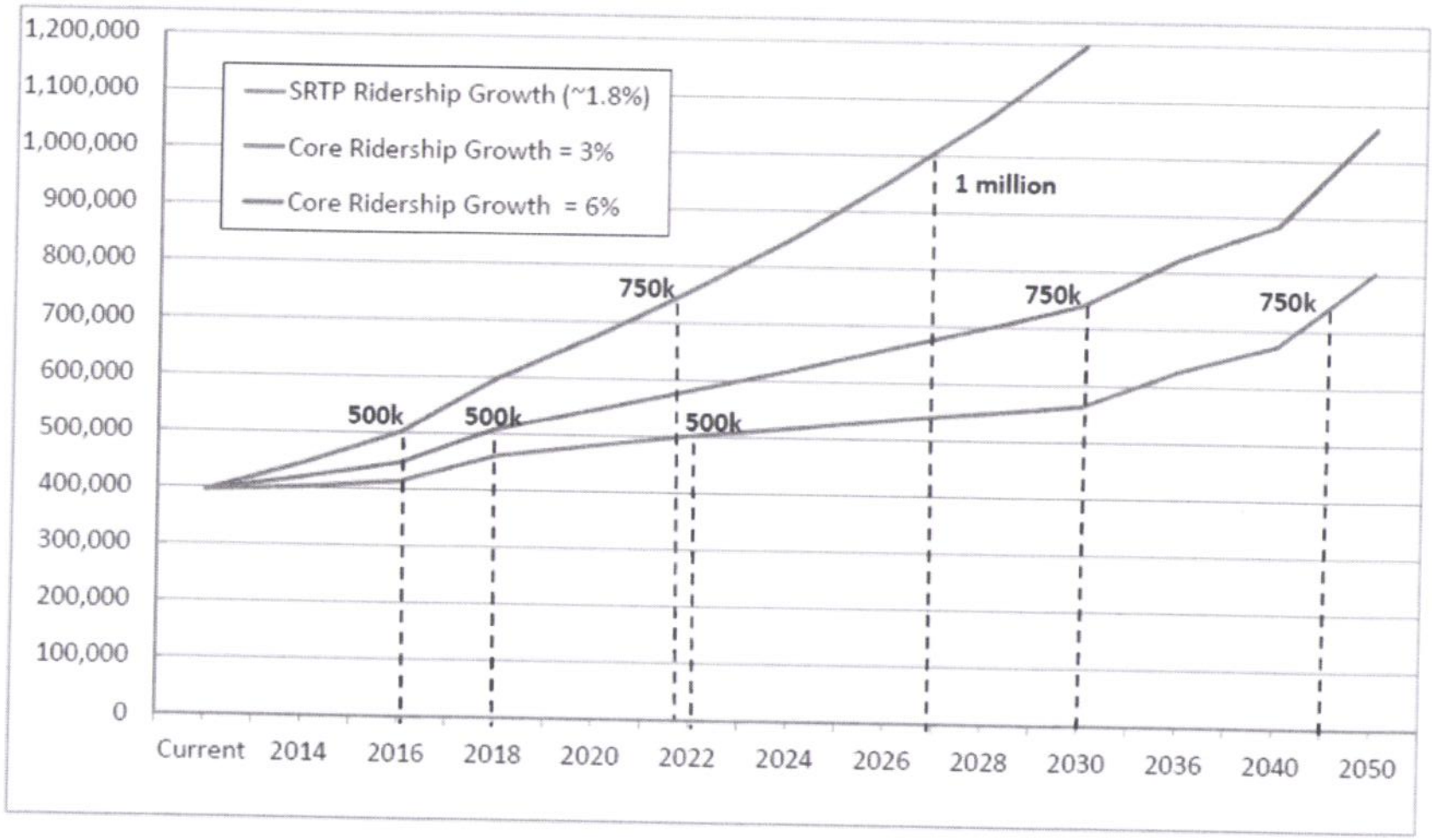
Jason Munkres
Senior Researcher
Association of Bay Area Governments
jasonm@abag.ca.gov
(510) 464-7929

Employment Growth by PDA and Jurisdiction

Santa Clara County

Jurisdiction or Area Name	Place Type	JOBS			
		2010	2040	2010-2040	% Growth
Campbell		***27,230***	***35,050***	***7,820***	***29%***
Central Redevelopment Area	Transit Neighborhood	7,880	10,220	2,340	
Cupertino		***25,990***	***33,350***	***7,360***	***28%***
Gilroy		***17,600***	***21,900***	***4,300***	***24%***
Downtown	Transit Town Center	2,370	3,600	1,230	
Los Altos		***14,700***	***18,160***	***3,460***	***24%***
Los Altos Hills		***3,580***	***4,440***	***860***	***24%***
Los Gatos		***23,580***	***28,980***	***5,390***	***23%***
Milpitas		***45,060***	***57,640***	***12,580***	***28%***
Transit Area	Suburban Center	5,240	9,560	4,320	
Monte Sereno		***450***	***570***	***120***	***27%***
Morgan Hill		***17,520***	***22,080***	***4,560***	***26%***
Downtown	Transit Town Center	1,660	3,000	1,340	
Mountain View		***47,800***	***63,380***	***15,570***	***33%***
Downtown	Transit Town Center	9,410	10,260	850	
East Whisman	*Employment Center*	*8,710*	*12,380*	*3,670*	
El Camino Real Corridor	Mixed-Use Corridor	5,770	6,630	850	
North Bayshore	Suburban Center	7,390	15,070	7,690	
San Antonio Center	Transit Town Center	3,150	4,330	1,180	
Whisman Station	Transit Neighborhood	650	1,210	560	
Palo Alto		***89,370***	***119,030***	***29,650***	***33%***
California Avenue	Transit Neighborhood	3,370	5,030	1,660	
San Jose		***375,360***	***522,050***	***146,680***	***39%***
Bascom TOD Corridor	Mixed-Use Corridor	11,520	12,910	1,390	
Bascom Urban Village	Mixed-Use Corridor	1,700	2,660	960	
Berryessa Station	Transit Neighborhood	6,140	12,180	6,040	
Blossom Hill/Snell Urban Village	Mixed-Use Corridor	880	1,720	840	
Camden Urban Village	Mixed-Use Corridor	5,600	7,630	2,030	
Capitol Corridor Urban Villages	Mixed-Use Corridor	2,340	5,590	3,250	
Capitol/Tully/King Urban Villages	Suburban Center	4,070	7,060	2,990	
Communications Hill	Transit Town Center	3,940	5,650	1,710	
Cottle Transit Village	Suburban Center	2,550	3,040	490	
Downtown "Frame"	City Center	26,760	31,090	4,330	
East Santa Clara/Alum Rock Corridor	Mixed-Use Corridor	9,950	13,380	3,430	
Greater Downtown	Regional Center	27,950	55,970	28,020	
International Business Park	*Employment Center*	*11,650*	*19,730*	*8,080*	
North San Jose	Regional Center	84,290	130,190	45,900	
Oakridge/Almaden Plaza Urban Village	Suburban Center	5,430	9,700	4,270	
Old Edenvale	*Employment Center*	*6,900*	*14,690*	*7,790*	
Saratoga TOD Corridor	Mixed-Use Corridor	3,520	5,520	2,000	
Stevens Creek TOD Corridor	Mixed-Use Corridor	5,680	8,020	2,340	
West San Carlos & Southwest Expressway Corridors	Mixed-Use Corridor	8,940	15,600	6,660	
Westgate/El Paseo Urban Village	Suburban Center	3,440	5,230	1,790	
Winchester Boulevard TOD Corridor	Mixed-Use Corridor	4,040	6,820	2,780	
Santa Clara		***112,460***	***145,560***	***33,100***	***29%***
El Camino Real Focus Area	Mixed-Use Corridor	4,390	6,980	2,590	
Santa Clara Station Focus Area	City Center	10,020	12,760	2,740	
Saratoga		***11,870***	***14,500***	***2,630***	***22%***
Sunnyvale		***74,610***	***95,320***	***20,710***	***28%***
Downtown & Caltrain Station	Transit Town Center	3,750	5,660	1,910	
East Sunnyvale	Urban Neighborhood	8,050	9,240	1,180	
El Camino Real Corridor	Mixed-Use Corridor	13,190	16,390	3,200	
Lawrence Station Transit Village	Transit Neighborhood	4,160	5,380	1,220	
Moffett Park	*Employment Center*	*11,420*	*18,890*	*7,470*	
Peery Park	*Employment Center*	*5,980*	*7,920*	*1,940*	
Reamwood Light Rail Station	*Employment Center*	*3,050*	*3,720*	*680*	
Tasman Station ITR	Mixed-Use Corridor	1,540	2,530	980	
Santa Clara County Unincorporated		***39,060***	***47,800***	***8,740***	***22%***
Valley Transportation Authority					
Cores, Corridors, and Station Areas	*Mixed-Use Corridor*	*90,770*	*118,380*	*27,610*	

Attachment A
Projected BART Ridership Growth



Note 1 – assumes WSX opens 2016, SVBX opens 2018.

February 17, 2012

The Honorable James P. Spering
Chair, Planning Committee
Metropolitan Transportation Committee
101 Eighth Street
Oakland, California 94607

The Honorable Mark Green
Chair, Administrative Committee
Association of Bay Area Governments
101 Eighth Street
Oakland, California 94607

Dear Chair Spering and Chair Green:

As agencies focused on the protection and maintenance of nearly 300,000 acres of open space lands, we are uniquely positioned to protect and manage the vital natural resources throughout the Bay Area. As the Metropolitan Transportation Commission (MTC) and the Association of Bay Area Governments (ABAG) move forward with the Plan Bay Area effort and prepare to invest more than $250 billion into our economy over the next 25 years, we seek a partnership with your agencies to effectively and efficiently protect and enhance vital natural resource areas in the region. While the vast majority of the $250 billion will be allocated toward transportation projects, we ask that a 5% investment of Plan Bay Area funds be set-aside for achieving the vital natural resource protection goals of SB 375.

We recognize that Plan Bay Area is an historic opportunity to partner with MTC and ABAG as our nine county region works to develop the Regional Transportation Plan (RTP) with a Sustainable Communities Strategy (SCS). We believe we can make a strong contribution in the ongoing regional Plan Bay Area efforts to reduce greenhouse gases, and adopt a holistic approach to transportation and land use planning.

Growth will continue to occur in the Bay Area. If we put mechanisms in place to grow properly, it has the potential to benefit us all – particularly in the three areas identified by the Plan Bay Area effort: Economy, Environment and Equity. Reducing uncertainties in the

planning and development of projects will strengthen investment in the region and foster sustainable growth.

In compliance with SB 375 and other environmental laws, transportation agencies will need reliable partners to protect and enhance vital natural resource areas in the region to off-set and mitigate significant impact on those resources. Open space agencies are in the best, most effective position to aid this effort as efficient stewards of mitigation dollars, effective partners in meeting local planning objectives and trusted arbitrators to ensure sustainable development can continue to occur – as well as helping to meet greenhouse gas reduction goals and species protection. Our agencies have already made and will continue to make major financial contributions to protecting open space and vital natural resources. Our success has been enhanced by our ability to leverage funding from a wide array of sources – including transportation mitigation dollars.

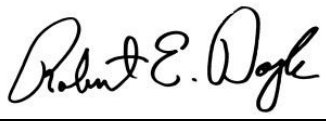
We believe our agencies can directly provide efficient resource protection and enhancement services which will help meet the requirement of state law (SB 375) to consider meaningful financial incentives for protecting vital natural resource areas in the region. For a modest 5% investment, our agencies can continue with and improve upon this work. Having a clear, meaningful financial incentive set-aside specifically cited in the preferred scenario of the Plan Bay Area effort which targets resource protection in all nine Bay Area counties would reduce uncertainty, inspire collaboration and stimulate investment.

Each of the nine Bay Area counties has very different vital natural resource protection needs and each of our agencies have different capacities, so funding should be flexible. It should be utilized for vital resource protection and enhancement which would include, but not be limited to: acquisition, operations, maintenance, stewardship and capital. Our agencies, for example, already provide resource enhancement to mitigate for transportation projects, habitat restoration, wildfire fuels management, regional bicycle and pedestrian alternative transportation routes, conservation of agricultural lands and working landscapes, watershed protection, and coastal wetland restoration.

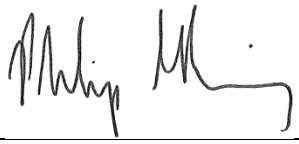
As the Plan Bay Area process proceeds, we look forward to continuing a dialogue with you, other MTC Commissioners and ABAG Assembly Members, and MTC and ABAG staff. We are prepared to take a leadership role in ensuring the Environment “E” of the three-legged

stool is firmly a part of Plan Bay Area, our Regional Transportation Plan and Sustainable Communities Strategy.

Regards,



Robert E. Doyle, General Manager
East Bay Regional Park District



Phil Ginsburg, General Manager
San Francisco Recreation and Parks

Steve Abbors, General Manager
Midpeninsula Regional Open Space District

Andrea Mackenzie, General Manager
Santa Clara County Open Space Authority

William J. Keene, General Manager
Sonoma County Agricultural Preservation and Open Space District

John Woodbury, General Manager
Napa County Regional Park and Open Space District

Linda Dahl, Director and General Manager
Marin County Parks

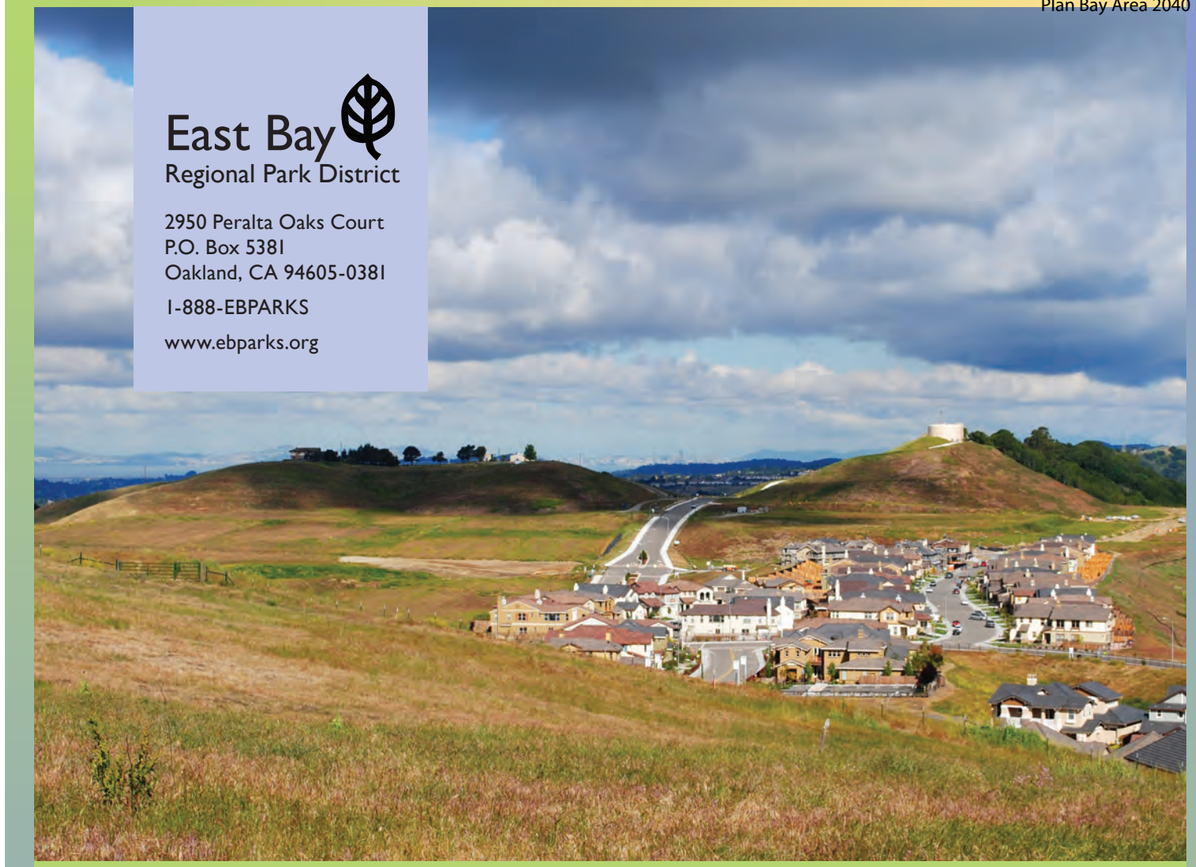
cc: Steve Heminger, MTC Executive Director
Ezra Rapport, ABAG Executive Director
Doug Kimsey, MTC Planning Director
Ken Kirkey, ABAG Planning Director

East Bay
Regional Park District

2950 Peralta Oaks Court
P.O. Box 5381
Oakland, CA 94605-0381

1-888-EBPARKS

www.ebparks.org



URBAN OPEN SPACE ACQUISITION: Acquire lands adjacent to urban areas and priority conservation areas. Complete park and urban boundaries to preserve sensitive wildlife habitat consistent with District's master plan. Acquire urban open space corridors. Promote carbon sequestration by protecting open space and preserving vegetation.
Project Cost: $121 M

FUELS MANAGEMENT: Reduce and manage dangerous fuel loads along urban/wildland interface to reduce intensity of wildfires and associated risk to the urban environment and human safety. Maintain strategic fire trails. Control and prevent invasive weed colonization.
Project Cost: $91 M

PAVEMENT MAINTENANCE: Utilizing the Metropolitan Transportation Commission's Streetsaver Pavement Management Program, identify and address maintenance priorities to improve the current pavement condition index of the District's 16 million square feet of roads, trails and parking areas. Ensure safe access for recreation and transportation purposes and avoid high cost of reconstruction.
Project Cost: $56 M

UTILITY INFRASTRUCTURE SECURITY AND MAINTENANCE: Repair, operate, modernize park infrastructure including waterlines, sewage systems, electrical systems and communication systems. Upgraded systems will reduce carbon emissions, prevent environmental damage and provide energy savings.
Project Cost: $125 M

GREENING THE FLEET AND FACILITIES: Initiate fleet replacement, including heavy equipment, to meet or exceed the most current fuel efficiency and emissions standards. Procure or retrofit to alternative fuel models to meet CARB rules. Pursue alternative energy sources and promote shift to green building standards.
Project Cost: $94 M

Printed on recycled paper.

East Bay
Regional Park District

Green Transportation and Environmental Maintenance Project

Photo: Deane Little

The District seeks to aid in the Sustainable Communities Strategy (SCS) Plan Bay Area process to help identify and protect resource areas in Alameda and Contra Costa counties.

For over 75 years, East Bay Regional Park District ("District"), a California Special District, has acquired and managed a diversified system of regional parklands which offers outstanding recreational opportunities and preserves significant biologic, geologic, scenic and historic resources within Alameda and Contra Costa counties. The District owns and operates nearly 110,000 acres of parkland and open space in these two counties – over 10% of the land mass – and over 1,200 miles of trails. As part of its mission, the District balances environmental concerns with public access, and maintains and restores parklands and other valuable natural resources so that they retain their important scenic, ecological and cultural values.

Most District lands are wildlands—natural resource areas which provide watershed, open space, recreation, and habitat for plants and animals. District management activities are designed to conserve, enhance and restore natural plant communities, to protect populations of rare, threatened and endangered species of plants and animals, and to provide and enhance recreational opportunities and access for the public on a regional scale. Vegetation on the District's wildlands also provides important climate and air quality benefits by sequestering about 91,157 metric tons of carbon per year – equivalent to the emissions of 16,317 vehicles and 10.4 million gallons of gasoline.

In the mid-1970s, the District pioneered the concept of developing an integrated network of paved bicycle and pedestrian trails linking the 33 communities throughout the East Bay. Working closely with local and regional transportation planners and transit agencies, the District has developed over 175 miles of paved, non-motorized trails. These "Green Transportation" corridors provide "last mile" connections to transit, as well as access to schools, employment centers and businesses.

East Bay Regional Park District

Green Transportation and Environmental Maintenance Project

PROJECTS PROPOSED for PLAN BAY AREA meet the following goals:

Climate Protection, Healthy and Safe Communities, Open Space Preservation, Equitable Access, Economic Vitality, Transportation System Effectiveness, Infrastructure Security

HEALTHY PARKS / HEALTHY PEOPLE INITIATIVES AND ACTIVITIES: Conduct programs that get people into parks and educate them about natural systems and healthy lifestyles. Promote public awareness about the connection between individual and community health and accessible, well-managed parks. Fund transit services to bring people from under-served communities to parks.
Project Cost: $92 M

EAST BAY GREEN TRANSPORTATION NETWORK: Complete critical gaps in the District's regional trail network to safely connect people to transit, schools, activity and commercial centers, and residential areas.
Project Cost: $103 M

HABITAT RESTORATION AND ENHANCEMENT: Expand, restore and protect wetland, riparian, coastal prairie and other important watersheds and habitats. Enhance habitat for threatened or endangered species. Protect shoreline communities through coastal wetland restoration to adapt to sea-level rise and climate change. Perform wetland, pond and dam maintenance on 300+ ponds and streams to improve water quality for habitat enhancement, recreation, and to prevent flooding and downstream sediment impacts. Provide invasive weed control to protect natural resource areas.
Project Cost: $107 M

Healthy Parks Healthy People

ENVIRONMENTAL MAINTENANCE AND OPERATION OF URBAN INTERFACE PARKS AND PUBLIC ACCESS TRAILS: Build new and maintain existing public access trails for all users. Provide easily accessible picnic, camp and fishing sites. Construct visitor centers with state of the art facilities to interpret the significant cultural and natural resources of the area. Operate and maintain park lands and facilities for public access and resource protection.
Project Cost: $211 M

Chart of EBRPD parks and PBA proposal

Potentially significant impacts on EBRPD regional parks from Plan Bay Area Draft Plan proposal.

ALAMEDA COUNTY

EBRPD Regional Park	PBA (2010-2040)	
	Additional Housing Units	Additional Jobs
Alameda		
Crown Beach	+5,890 HU	+9,150 Jobs
Alameda Naval Air Station		
Albany		
McLaughlin Eastshore State Park	+1,170	+1,400
Tilden		
Berkeley		
McLaughlin Eastshore State Park	+9,280	+22,210
Tilden		
Pt. Isabel		
Wildcat Canyon		
Claremont Canyon		
Temescal		
Dublin		
Dublin Hills	+8,530	+12,540
Pleasanton Ridge		
Tassajara Creek		
Doolan Canyon		
Emeryville		
McLaughlin Eastshore State Park	+5,470	+7,540
Eastbay Gateway		
Fremont		
Mission Peak	+17,620	+29,970
Coyote Hills		
Ardenwood		

Quarry Lakes		
Vargas Plateau		
Dry Creek Pioneer		
Monument Peak		
Dumbarton Quarry		
Hayward		
Hayward Shoreline	+12,290	+20,800
Don Castro		
Garin		
Dry Creek Pioneer		
Pleasanton Ridge		
Coyote Hills		
Livermore		
Brushy Peak	+9,670	+13,250
Doolan Canyon		
Newark		
Ardenwood	+3,670	+5,210
Coyote Hills		
Dumbarton Quarry		
Oakland		
McLaughlin Eastshore State Park	+51,490	+85,240
Claremont Canyon		
Temescal		
Sibley		
Huckleberry		
Leona Canyon		
Redwood		
Roberts		
Anthony Chabot		
Lake Chabot		
Oyster Bay		
MLK Jr. Shoreline		
Oakland Shoreline		
Eastbay Gateway		
Piedmont		
Temescal	+90	+480
Pleasanton		
Pleasanton Ridge	+7,150	+15,300

Dublin Hills		
Shadow Cliffs		
Chain of Lakes		
San Leandro		
Oyster Bay	+7,210	+12,930
Lake Chabot		
Anthony Chabot		
Hayward Shoreline		
Union City		
Garin	+3,010	+5,100
Dry Creek Pioneer		
Pleasanton Ridge		
Vargas Plateau		
Quarry Lakes		
Alameda County Unincorporated		
Cull Canyon	+5,430	+12,080
Don Castro		
Lake Chabot		
Anthony Chabot		
Pleasanton Ridge		
Garin		
ALAMEDA COUNTY TOTAL	+147,970 Housing Units; +477,754 People	+253,200 Jobs

CONTRA COSTA COUNTY

EBRPD Regional Park	PBA (2010-2040)	
	Additional Housing Units	Additional Jobs
Antioch		
Black Diamond Mines	+5,470 HU	+6,420 Jobs
Contra Loma		
Deer Valley		
Antioch-Oakley Shoreline		
Big Break		
Brentwood		
Deer Valley	+850	+2,620
Clayton		

Clayton Ranch	+110	+400
Concord		
Concord Hills	+18,040	+21,790
Danville		
Las Trampas	+1,500	+4,160
Little Hills		
Diablo Foothills		
Sycamore Valley		
El Cerrito		
McLaughlin Eastshore State Park	+1,200	+1,430
Pt. Isabel		
Wildcat Canyon		
Tilden		
Hercules		
San Pablo Bay Shoreline	+4,510	+2,520
Lone Tree Point		
Crockett Hills		
Rancho Pinole		
Lafayette		
Briones	+1,370	+2,590
Martinez		
Carquinez Strait Shoreline	+1,260	+4,160
Martinez Shoreline		
Waterbird		
Moraga		
Las Trampas	+760	+1,190
Redwood		
Oakley		
Antioch-Oakley Shoreline	+5,530	+2,930
Big Break		
Orinda		
Tilden	+800	+1,450
Briones		
Sibley		

Pinole		
Point Pinole	+1,080	+1,740
San Pablo Bay Shoreline		
Sobrante Ridge		
Pittsburg		
Black Diamond Mines	+7,380	+5,610
Pittsburg Wetlands		
Pleasant Hill		
Briones	+1,210	+5,560
Richmond		
Point Pinole	+9,690	+11,520
Miller/Knox		
Wildcat Canyon		
McLaughlin Eastshore State Park		
Pt. Isabel		
Brooks Island		
San Pablo Bay Shoreline		
Sobrante Ridge		
Kennedy Grove		
Point Molate		
San Pablo		
Point Pinole	+1,890	+2,190
North Richmond Shoreline		
Wildcat Canyon		
San Ramon		
Bishop Ranch	+5,330	+14,350
Las Trampas		
Sycamore Valley		
Tassajara Creek		
Walnut Creek		
Briones	+7,370	+15,650
Diablo Foothills		
Las Trampas		
Contra Costa County Unincorporated		
Bay Point Wetlands	+4,670	+13,800

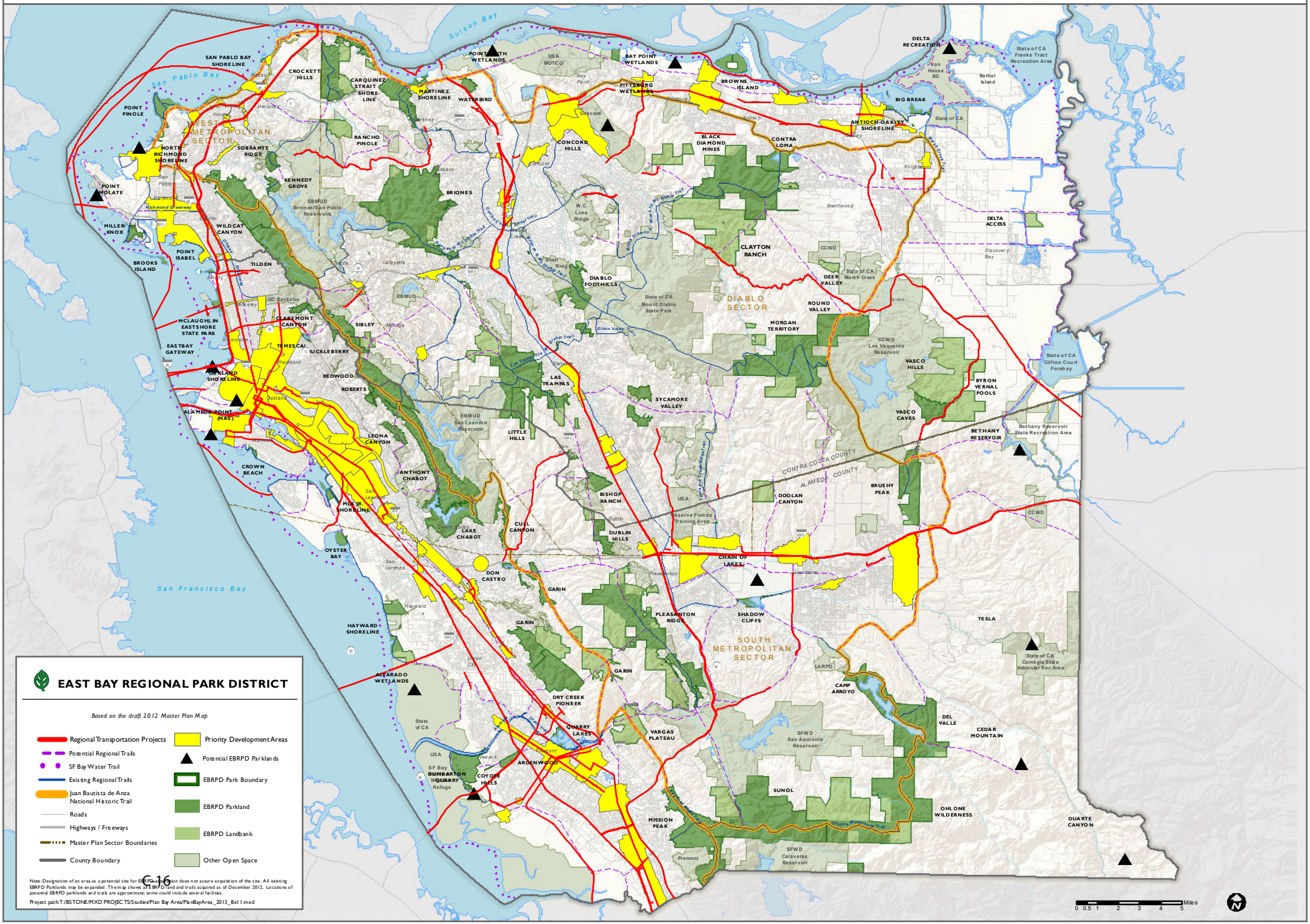
North Richmond Shoreline		
San Pablo Bay Shoreline		
CONTRA COSTA COUNTY TOTAL	+80,020 Housing Units; +285,945 People	+122,080 Jobs

EBRPD TWO-COUNTY TOTAL

EBRPD Regional Park	PBA (2010-2040)	
	Additional Housing Units	Additional Jobs
ALAMEDA COUNTY SUB-TOTAL	+147,970 Housing Units; +477,754 People	+253,200 Jobs
CONTRA COSTA COUNTY SUB-TOTAL	+80,020 Housing Units; +285,945 People	+122,080 Jobs
EBRPD TWO-COUNTY TOTAL	+227,990 Housing Units; +763,699 People	+375,280 Jobs

East Bay Regional Park District

EAST BAY REGIONAL PARK DISTRICT
Plan Bay Area Regional Transportation Projects and Priority Development Areas



EAST BAY REGIONAL PARK DISTRICT

Based on the draft 2012 Master Plan Map

- Regional Transportation Projects
- Potential Regional Trails
- SF Bay Water Trail
- Existing Regional Trails
- Juan Bautista de Anza National Historic Trail
- Roads
- Highways / Freeways
- Master Plan Sector Boundaries
- County Boundary
- Priority Development Areas
- Potential EBRPD Parklands
- EBRPD Park Boundary
- EBRPD Parkland
- EBRPD Landbank
- Other Open Space

Note: Designation of an area as a potential site for EBRPD action does not assure acquisition of the site. All existing EBRPD Parklands may be expanded. The map shows all EBRPD land and trails acquired as of December 2012. Locations of potential EBRPD parklands and trails are approximate; some could include several facilities.

Project path: T:/BSTONE/MXD PROJECTS/Studies/Plan Bay Area/PlanBayArea_2013_8x11.mxd

UNITED STATES DEPARTMENT OF COMMERCE
Economics and Statistics Administration
U.S. Census Bureau
Washington, DC 20233-0001
OFFICE OF THE DIRECTOR

MAR 7 2013

The Honorable Raquel Gonzalez
Mayor, Town of Colma
1198 El Camino Real
Colma, California 94014

Dear Mayor Gonzalez:

Thank you for your letter expressing your concerns about the 2010 Census counts for the Town of Colma, California, as part of the Count Question Resolution (CQR) Program.

We reviewed the documentation you provided in conjunction with the official 2010 Census records as part of our research to resolve your questions. Our research found errors in the geographic placement of housing units/group quarters related to the Town of Colma. The updated census tract and block counts will be available at www.census.gov/prod/cen2010/notes/errata.pdf and will soon be posted to http://factfinder2.census.gov.

Enclosed is the official statement from the U.S. Census Bureau describing the corrected population counts for the Town of Colma. The CQR case that resulted in this change is **Case Number 90653.**

Thank you for your efforts to ensure that the 2010 Census counts are as accurate as possible. If there are further concerns, please contact the CQR Program Office at 301-763-9329.

Sincerely,

Thomas L. Mesenbourg, Jr.
Acting Director

cc: Laura Allen, City Manager

Enclosure

D-18(L)CQR-C (P)

UNITED STATES DEPARTMENT OF COMMERCE
Economics and Statistics Administration
U.S. Census Bureau
Washington, DC 20233-0001
OFFICE OF THE DIRECTOR

MAR 7 2013

FROM THE DIRECTOR
U.S. CENSUS BUREAU

This is an official statement of the revised 2010 Census population and housing counts, including corrections made through February 19, 2013, for the Town of Colma, California.

According to the official records of the TWENTY-THIRD DECENNIAL CENSUS OF THE UNITED STATES, on file at the U.S. Census Bureau, the following are the revised counts as of April 1, 2010 for the Town of Colma, California.

Population..... 1,454
Housing Units..... 446

Thomas L. Mesenbourg, Jr.
Acting Director

This statement is being sent to the Mayor, Town of Colma, California.

Census counts used for Congressional apportionment, legislative redistricting and the 2010 Census data products will remain unchanged. The Census Bureau will include the corrections in the errata information, which will be available via the Internet on the *American FactFinder* system, and use them specifically to modify the decennial census file for use in annual postcensal estimates beginning in December 2012.

Details regarding the Census Bureau's calculation of these figures are attached. If you require additional information, you may contact the Census Bureau's Count Question Resolution Program Office at 301-763-9329 and refer to **Case Number 90653.**

D-18(L)CQR-F

2010 Census Count Question Resolution Update: February 19, 2013 CQR Case ID: 90653

							Original tabulation counts		Corrected counts		Change	
Summary Level	State Abv	FIPS State Code	FIPS County Code	FIPS County Subdivision Code	FIPS Place Code	Area Name	Total housing units	Total population	Total housing units	Total population	Total housing units	Total population
160	CA	06	999		14736	Colma town	586	1,792	446	1,454	-140	-338

Source: Population Division, U.S. Census Bureau

Geographic Detail for 2010 Count Question Resolution Update - February 19, 2013

CQR Case ID: 90653

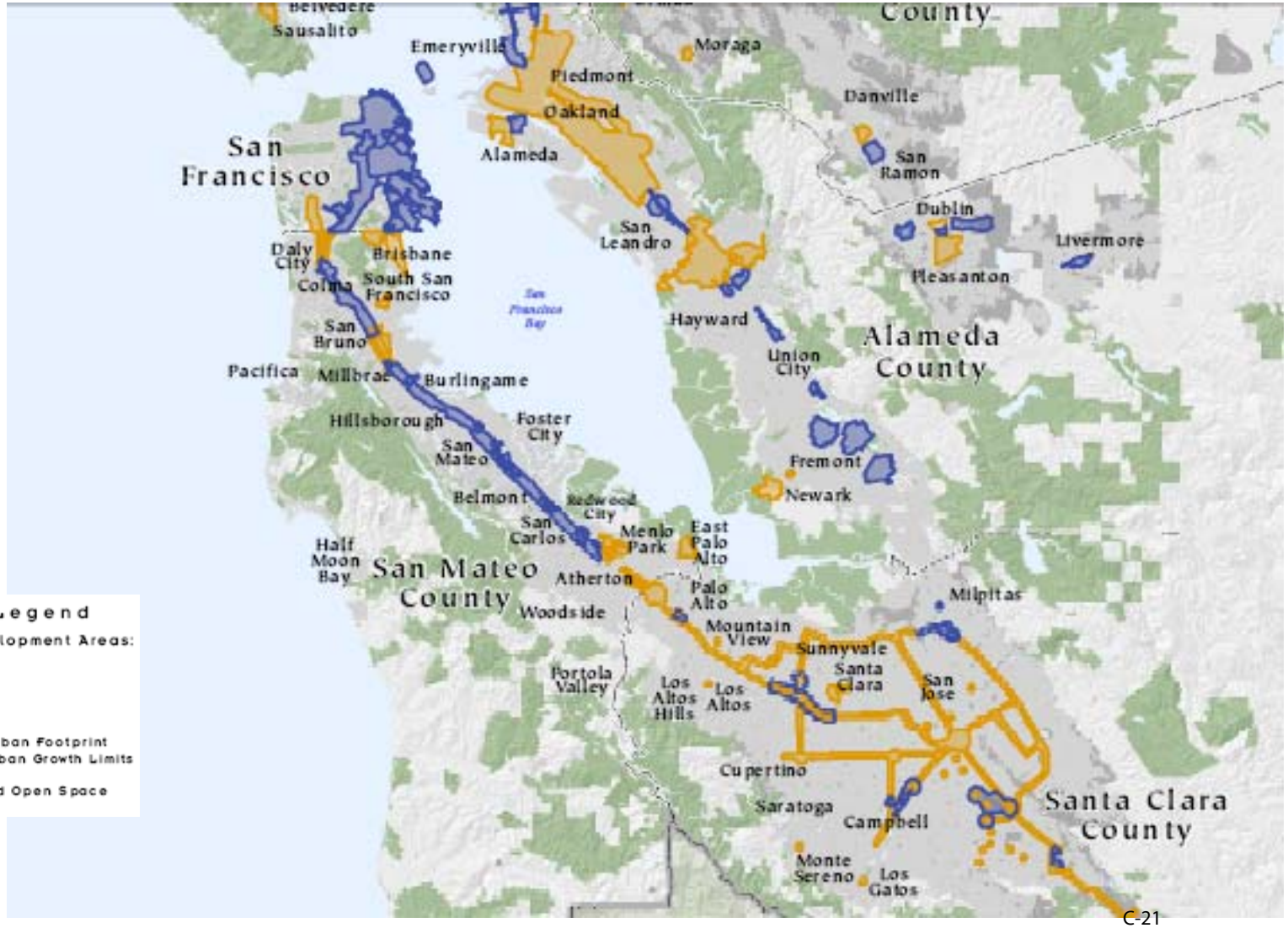
Colma town, CA

Summary Level	FIPS State Code	FIPS County Code	FIPS County Subdivision Code	FIPS Place Code	Census Tract Code	Census Block Code	Area Name	Original tabulation counts: Total housing units	Original tabulation counts: Total population	Corrected counts: Total housing units	Corrected counts: Total population	Differences: Total housing units	Differences: Total population
040	06						California	13,680,081	37,253,956	13,680,081	37,253,956	0	0
050	06	081					San Mateo County	271,031	718,451	271,031	718,451	0	0
060	06	081	93170				South San Francisco CCD	110,554	306,115	110,554	306,115	0	0
070	06	081	93170	14736			Colma town	586	1,792	446	1,454	-140	-338
080	06	081	93170	14736	601300		Tract 6013 (part)	41	139	42	147	1	8
101	06	081	93170	14736	601300	2028	Block 2028	33	116	34	124	1	8
080	06	081	93170	14736	601601		Tract 6016.01 (part)	545	1,653	404	1,307	-141	-346
101	06	081	93170	14736	601601	1005	Block 1005	153	397	0	0	-153	-397
101	06	081	93170	14736	601601	2010A	Block 2010A			12	51	12	51
070	06	081	93170	17918			Daly City city	32,588	101,123	32,576	101,072	-12	-51
080	06	081	93170	17918	601601		Tract 6016.01 (part)	513	1,230	501	1,179	-12	-51
101	06	081	93170	17918	601601	2010	Block 2010	74	197			-74	-197
101	06	081	93170	17918	601601	2010B	Block 2010B			62	146	62	146
070	06	081	93170	99999			Remainder of South San Francisco CCD	962	2,424	1,114	2,813	152	389
080	06	081	93170	99999	601300		Tract 6013 (part)	380	827	532	1,216	152	389
101	06	081	93170	99999	601300	2008	Block 2008	25	75	24	67	-1	-8
101	06	081	93170	99999	601300	2009	Block 2009	15	37	168	434	153	397
160	06	999		14736			Colma town	586	1,792	446	1,454	-140	-338
160	06	999		17918			Daly City city	32,588	101,123	32,576	101,072	-12	-51

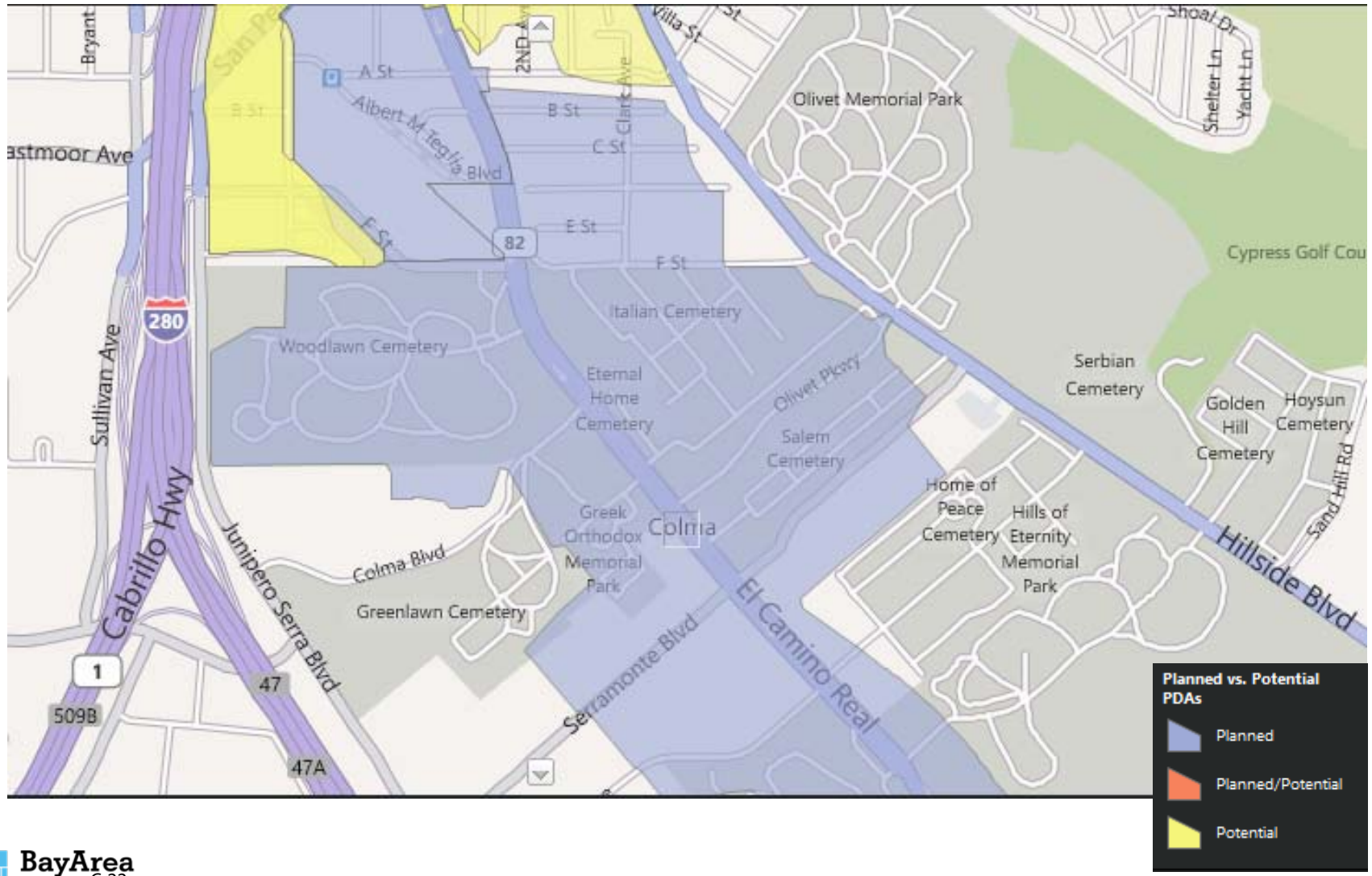
Note: Blanks in "Original tabulation" columns indicate that this geographic combination did not exist in the 2010 Census. Blanks in "Corrected counts" columns indicate that the geographic combination does not exist after the CQR change.

Source: Population Division, U.S. Census Bureau

Town of Colma and Priority Development Areas (PDA's)



Town of Colma Planned Priority Development Area (PDA)



TOWN OF COLMA
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April 9, 2012 **SENT ELECTRONICALLY**

City Council
Raquel Gonzalez
Mayor
Joanne F. del Rosario
Vice Mayor
Joseph Silva
Council Member
Diana Colvin
Council Member
Council Member
Helen Fisicaro
City Treasurer
Laura Walsh
City Officials
Laura Allen
City Manager
Robert L. Lotti
Chief of Police
Roger Peters
City Attorney
Cyrus Kianpour
Acting City Engineer
Brad Donohue
Acting Public
Works Director
Michael Laughlin, AICP
Acting City Planner
Brian Dossey
Director of Recreation
Services
Lori Burns
Human Resources Manager

Ms. Athena Ullah
Association of Bay Area Governments
P.O. Box 2050
Oakland, CA 94604

RE: Comments on the Jobs-Housing Connection Scenario

Dear Ms. Ullah,

Per your request seeking comments on the Jobs-Housing Connection Scenario, the Town of Colma has several comments on the draft document and supporting spreadsheets. We have also attached the two previous letters that we have sent regarding the SCS process, and you will find our responses in this letter consistent with these two letters. The Town of Colma appreciates the opportunity to provide these comments. Specifically, you requested that we respond to the following questions:

1. Please provide your thoughts on the job and housing distribution methodologies utilized in the Jobs –Housing Connection Scenario

After reviewing the draft Jobs-Housing Connection Scenario, the narrative made sense and could be a plausible growth pattern and rate for the Bay Area. The graphs and projections for the scenario make sense, but continue to be too high and optimistic given the new economy. Figure 3 shows regional employment increasing substantially between 2010 and 2020, with more moderate increases in following decades, where it would make more sense to apply the moderate growth rate starting in 2010. Figure 4 shows an extremely optimistic increase in professional jobs, far exceeding historic trends and cyclical ups and downs of this sector. For Colma, being almost fully built-out, we are expecting to see only modest job growth within our existing retail and service sectors, and an even more limited increase in the professional sector.

Likewise, housing distribution continues to seem unrealistic, except in those locations where residential development is planned to occur within the Bay Area. As will be discussed below (using Colma as an example), unrealistic housing growth expectations are being placed in PDA's, with little regard to the existing uses within them. The assumptions seem to suggest a wholesale redevelopment and intensification with high density housing (at higher densities than permitted in local General Plans) which has

only historically occurred in redevelopment areas. With profitable existing land uses, property owners are not going to voluntarily offer to build mixed-use projects and risk losing existing businesses while taking several years to entitle and build new buildings. Colma's existing retail shopping centers and auto businesses have remained largely unchanged for the last 20 years, without any indication that they will change in the next 20 years as long as the existing land uses remain profitable. Without any redevelopment agencies (and Colma has never had one) there are no tools to require or incentivize land use changes. Developer financing also remains tight, and will likely remain so into the future.

For the Town of Colma, the ABAG methodology linking the production of jobs to housing production, even when weighted, seems problematic. Colma exists first as a regional provider of cemetery land and services (comprising 76% of our land area) and a regional provider of consumer goods. The Town provides the commercial services that are not available to people living in the southern and western portions of San Francisco and portions of Daly City and cities south of us. To support these businesses, Colma will never be able to have a jobs/housing balance or be able to produce housing that will meet even modest job growth within the Town.

2. Please provide any feedback on the housing and job growth distributions to your PDAs and your jurisdiction.

As stated in our previous letters, the predominant cemetery land use in Colma (much of which is within the El Camino Real PDA) makes any residential development extremely limited to only a few small sites within the town. The small sites that do exist on the El Camino Real have an office zoning, and are not appropriate for residential use, and residential use is not permitted under the General Plan or Zoning. Residential uses are permitted in the Commercial zone, but, as stated above, existing profitable businesses are not going to voluntarily develop mixed use projects to create housing, even if the zoning allows it.

Based on ABAG employment projections between 1990 and 2010, Colma businesses employ an average of just over 2,400 people. The employment figures in the "jurisdictions" table indicate that Colma jobs could increase from approximately 2,790 in 2010 to 3,210 by 2040. While this increase is plausible, without the construction of new businesses or offices, job growth could be much more modest and subject to economic fluctuations of the retail sector, which means that employment growth could remain at its present level or even decrease slightly. The general model used by ABAG assumes that as knowledge based jobs increase in the region, then the number of other types of jobs and businesses follow to support this growth. With limited knowledge base job growth expected within Colma, it will not lead to the construction of new retail or service

businesses, only increased patronage of existing businesses. In addition, since the common brick and mortar stores are becoming less common (or reducing their footprint) as more purchases are made on-line, it is less plausible that additional retail or service tenant space (or jobs) will be produced, only recycled and subdivided.

3. Please review the data used to construct the distributions and provide any corrections. In particular, provide any corrections to the following data in the Jobs-Housing Connection Housing Distribution Details spreadsheet (provided):

    - Local PDA Housing Unit Growth: column S ("All Areas" worksheet)

This worksheet suggests that Colma could see an increase of 200 units between 2010 and 2040. As described in our last letter, we see any number over 150 units to be infeasible based on land use constraints and land availability. In addition, the starting number of 564 housing units from the 2010 Census is wrong. Due to our small size, we have precisely identified the existence of only 433 housing units within the town and we are currently challenging the U.S. Census figure. We would like to request that ABAG insert this value into your spreadsheets. An almost 50% increase in existing units without land resources or likelihood that existing commercial uses will redevelop to include housing is not plausible.

In looking at the remaining line items for Colma, it appears that ABAG is treating Colma's PDA area along the El Camino like all other PDAs, not recognizing that almost all of the land is either: in cemetery use that will not and cannot legally be changed to another use; is an existing single family neighborhood that is not going to intensify; or is comprised of successful businesses that have no plans to redevelop. There have been no adjustments made in columns BA-BE that would account for this reality.

- Local Jurisdiction Housing Unit Growth: column H ("Jurisdictions" worksheet)

If we are reading the Jurisdictions worksheet correctly, we believe that ABAG has also been remiss by assuming that because we have a large area of our town in the El Camino PDA and because we are close to transit (Colma BART) that a full complement of units could be built. Based on our reading of line 67 of the "Jurisdictions" table, it appears that our previous letter was largely ignored since the maximum 150 units was entered in column H, but that a reduction of only 1 unit (assuming to be outside of the PDA area) was made in the table. The unit adjustments should be greater (in the neighborhood of 50 units), resulting in a total that should not exceed a maximum of 150 units that could be built by the year 2040.

4. Do you believe that with this scenario your local jurisdiction can advance the goals and principles of the Sustainable Communities strategy?

While the Town would like to advance the goals and principles of the Sustainable Communities Strategy, the lack of developable land will limit our contribution. Colma is unique in that it is a town that provides for regional commercial opportunities that draw from a much wider market area than the town limits. In addition, it provides a regional supply of cemetery land, primarily to serve the City of San Francisco since in-ground cemeteries were removed from San Francisco at the beginning of the last century. Over 76% of Colma's land area is designated and/or deed restricted for only cemetery use, and a large portion is within the El Camino PDA. Colma incorporated in 1924 to protect cemetery land use. Colma's opportunities to provide housing are also further limited based on the limited availability of developable land with the appropriate General Plan designation or zoning, which are not proposed to be changed in order to respect the cemetery land use.

We appreciate ABAG's monumental effort in trying to realistically quantify job growth and housing for the region, and to locate, plan and put resources behind this anticipated growth. What is challenging for individual cities in this process is that there is are non-quantifiable nuances to each City that cannot be fully captured by the data. It is the Town of Colma's hope that by understanding the dynamic of our unique Town, that more realistic projections can be produced as the Jobs-Housing Connection Scenario is further developed.

Please feel free to contact me or Michael Laughlin if you have any further questions.

Sincerely,

Laura Allen
City Manager

Cc: Mayor and City Council
Johnny Jaramillo, Association of Bay Area Governments
Richard Napier, San Mateo City/County Association of Governments
Joseph Kott, San Mateo City/County Association of Governments
Michael Laughlin, AICP, Acting City Planner

Attachments: January 27, 2012 Letter from Town of Colma
May 19, 2011 Letter from Town of Colma

TOWN OF COLMA
1198 El Camino Real • Colma, California • 94014-3212
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January 27, 2012

SENT ELECTRONICALLY

City Council
Raquel Gonzalez
Mayor
Joanne F. del Rosario
Vice Mayor
Joseph Silva
Council Member
Diana Colvin
Council Member
Council Member
Helen Fisicaro
City Treasurer
Laura Walsh
City Officials
Laura Allen
City Manager
Robert L. Lotti
Chief of Police
Roger Peters
City Attorney
Cyrus Kianpour
Acting City Engineer
Brad Donohue
Acting Public
Works Director
Michael Laughlin, AICP
Acting City Planner
Brian Dossey
Director of Recreation
Services
Lori Burns
Human Resources Manager

Ms. Sailaja Kurella
Association of Bay Area Governments
P.O. Box 2050
Oakland, CA 94604

RE: Comments on the Alternative Scenarios

Dear Ms. Kurella,

As part of the Bay Area's process of preparing a Sustainable Communities Strategy in compliance with SB 375, The Metropolitan Transportation Commission (MTC) and the Association of Bay Area Governments (ABAG) have circulated Alternative Scenarios to guide in the preparation of the Preferred Scenario. The Town of Colma appreciates the opportunity to provide the following comments.

On May 19, 2011, the Town of Colma sent a letter commenting on the Initial Vision Scenario (IVS). A copy of this letter is attached for your reference and review. In the letter, we outlined the reasons why the adding of up to 912 units in the Town of Colma by the year 2035 is not realistic or attainable. For the Alternative Scenarios, the number of housing units projected are lower but remain too high to be attainable or plausible. In conversations with Marisa Raya regarding the modeling used to generate the numbers, she indicated that some density reductions were applied to the Colma portion of the El Camino Real PDA in recognition of the predominant cemetery land uses within the PDA. We believe these density reductions were insufficient.

For the Town of Colma, here are the projected number of additional households and jobs for the three relevant scenarios:

Forecasts for Town of Colma and San Mateo County to 2035			
	Constrained Core Concentration	Focused Growth	Outward Growth
New Households in Colma	609	521	210
Households in San Mateo County	15,470	12,420	10,560
New Jobs in Colma	511	503	421
Jobs in San Mateo County	22,870	21,200	18,430

The projected numbers are not in line with historic residential growth, nor do they recognize the availability of developable land within the Town. Town records indicate that the Town has only 403 residential units, and the current higher 2010 Census number is being challenged. In the last decade, Colma added only 65 new units, 63 of which were part of the Verano project on Mission Road, which was an unusually large housing project for the Town. Even fewer units were added in the 1990's. In 2011, the Town *lost* residents when a local senior assisted living facility closed. The Town's draft Housing Element for the years 2007-2014 identifies potential housing sites for 63 units. Due to the economy, there has been no developer interest in these sites, and they have yet to be developed.

Existing commercial uses within the El Camino Real PDA include predominantly larger retail stores and auto dealerships. The Town of Colma auto row started approximately 40 years ago, and there is no indication that this land use will change within the 30 year plan life. As you can appreciate, since auto sales and auto repair are incompatible as a mixed uses with residential, we do not anticipate any new residential grown in these areas.

We believe that the ABAG projections did not take into consideration land use designations in our General Plan. The Town has worked very hard to maintain an appropriate and respectful land use pattern for cemetery use along the El Camino Real. With the exception of a few properties between Serramonte Boulevard and Collins Avenue, the General Plan and Zoning along El Camino Real is cemetery or low intensity office, which does not permit residential development.

In closing, our May 19, 2011 letter stated that accommodation of more than 150 units would require developing housing some distance from the El Camino Real, conversion of existing revenue producing commercial property, or modifications to existing cemeteries (which is not legally possible). Therefore, based on historic residential growth, the economy, our General Plan and available land, we believe that the most units the Town could accommodate within thirty years would be something much less than 150 units and the Preferred Scenario should reflect this reality. Our City Council will be reviewing the Alternative Scenarios at their February 8, 2012 meeting, so additional comments may be forthcoming.

Sincerely,

Laura Allen
City Manager

Cc: Mayor and City Council
Marisa Raya, Association of Bay Area Governments
Richard Napier, San Mateo City/County Association of Governments
Joseph Kott, San Mateo City/County Association of Governments
Michael Laughlin, AICP, Acting City Planner

Attachment: May 19, 2011 Letter from Town of Colma

ATTACHMENT A

TOWN OF COLMA
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City Council

Helen Fisicaro
Mayor

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Vice Mayor

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City Officials

Laura Allen
City Manager

Robert L. Lotti
Chief of Police

Roger Peters
City Attorney

Rick Mao
City Engineer

Colette Meunier, AICP
Acting City Planner

Brian Dossey
Director of Recreation Services

Lori Burns
Human Resources Manager

May 19, 2011

SENT ELECTRONICALLY

Ms. Marisa Raya
Association of Bay Area Governments
P.O. Box 2050
Oakland, CA 94604

RE: Comments on the draft Initial Vision Scenario

Dear Ms. Raya,

As part of the Bay Area region's process of preparing a Sustainable Communities Strategy in compliance with SB375, the Metropolitan Transportation Commission (MTC) and the Association of Bay Area Governments (ABAG) have circulated the draft Initial Vision Scenario (IVS) for public review and comment. The Town of Colma (Colma) appreciates the opportunity to provide the following comments.

Colma understands that the IVS is the allocation of forecasted regional job growth and housing need, without consideration of such factors as regulatory, environmental or physical constraints regarding future development.

Our understanding of the IVS is that all of Colma's projected future housing growth, as shown on Map 3.6, *San Mateo County Place Types for Priority Development Areas and Growth Opportunity Areas* is located along the *El Camino Real Corridor Priority Development Area* which extends from the Southerly boundary of San Francisco through to San Jose. Although elsewhere in the IVS, Colma's projected development was described as dispersed throughout the jurisdiction, it was confirmed through follow-up discussions with ABAG staff that the focus of future development in Colma was along the El Camino Real Priority Development Area (PDA). In Table 3.7, *San Mateo County Initial Vision Scenario Household Growth 2010-2035 for Priority Development Areas and Growth Opportunity Areas by Jurisdiction*, Colma is shown as having 460 housing units today, and adding 912 housing units by 2035, nearly tripling the number of housing units.

We would like to briefly describe some key factors about Colma that will affect our ability to add housing units to our community consistent with the IVS.

1. First, and foremost, Colma serves a regional need for cemeteries. Colma was incorporated in 1924 by cemetery operators who were forced to relocate their cemeteries out of San Francisco in the early part of the 20th Century. Colma has 15 active

cemeteries, two pauper cemeteries with unmarked graves, and one pet cemetery. They occupy about 76 percent of the land area in Colma. In accordance with California's Cemetery Act (Health and Safety Code, 8550 et seq), cemetery land that has been laid out for burial sites is subject to a recorded declaration limiting the use of the land to cemetery use, which can only be lifted by a Superior Court action (H & SC, Section 8580).

2. A majority of the land in Colma that is within one quarter mile of El Camino Real (ECR) is in active cemetery use at this time. Seventy percent of the land fronting along ECR is designated for cemetery use and nearly all of that has already being used for cemetery purposes. The exceptions are adjacent to the Colma BART station, Town offices and commercial development along Serramonte Boulevard on either site of ECR, and land along Mission Road south of ECR to Colma's south boundary. The Mission Road area is generally developed with commercial uses.

3. The land in Colma not in cemetery use includes its commercial areas and areas to the east of Hillside Blvd. Colma has two shopping centers located along Junipero Serra Blvd., a Kohl's Store at the intersection of Serramonte Blvd. and ECR and an Auto Row along Serramonte Blvd. Much of this commercial development is over one-quarter mile from ECR and, therefore, does not provide good locations for compact, transit-oriented development. The areas not yet in cemetery use along Hillside Blvd. are over two-thirds of a mile from ECR or the South San Francisco BART station.

4. Colma is recognized as a low property tax community because of Proposition 13. Over 50 percent of its General Fund budget comes from sales tax revenue. Conversion of its commercial areas to housing development would seriously affect Colma's ability to provide municipal services to the residents and businesses in Colma.

5. Colma's draft Housing Element identifies sites to accommodate a total of 75 residential units, and these sites are along or near ECR. There are some sites, such as the existing Kohl's store, and the southern portion of Mission Road where a combination of additional development and redevelopment may accommodate 50 to 75 units. Accommodation of more than 150 units would require developing housing at some distance from ECR, conversion of existing, revenue producing commercial property, or modifications to existing cemeteries.

ABAG/MTC has requested that five questions be considered in developing individual responses to the IVS. The questions, and the Town's responses, follow.

1. Is the proposed place type appropriate for your Priority Development Area(s), Growth Opportunity Area(s)? Given the availability of resources, is the proposed urban scale, mix of uses and expected household growth appropriate?

El Camino Real (ECR) through Colma as a "Mixed-Use Corridor" place type. This designation is appropriate for those areas in close proximity to either the Colma and SSF BART stations, and is consistent with Colma's General Plan. However, from the BART

crossing south to Mission Road, most of the land along ECR is in cemetery use and not available for redevelopment as mixed use. Therefore, the Mixed-Use place type is appropriate in Colma only next to the two BART stations..

2. **What transportation improvements would help support those Priority Development Area(s), Growth Opportunity Area(s) in your jurisdiction?**

The projected household growth in Colma, particularly if developed throughout the jurisdiction and not just focused along El Camino Real, would require significant improvements to transit systems.

3. **What additional funding would be needed to support housing growth?**

The projected housing growth would require significant infrastructure investments, including, but not limited to, improvements to public safety, schools, parks, transit, roads, and other utility infrastructure. Compact, transit oriented growth would occur mostly on lands currently designated for commercial use, and potentially impact sales tax generation on these lands. Colma relies heavily on sales tax revenues to fund its services, and a negative impact on tax-generating land uses would jeopardize Colma's ability to continue to provide municipal services.

4. **If the Initial Vision Scenario growth estimate is too high, should some of the growth be shifted to another part of your jurisdiction, elsewhere in the County, or elsewhere in the region?**

Colma has areas near the Colma BART station and South San Francisco BART station that are appropriate for mixed-use and higher-density residential development and these areas have been identified in Colma's General Plan for such development. However, these limited areas appropriate for compact, transit oriented use are not sufficient for 912 housing units. The proposed units cannot be allocated elsewhere in the community because of land in cemetery use, and because areas along Hillside Blvd. are too far from ECR and BART stations to provide transit oriented development. Developing 912 housing units in Colma would violate the overall objectives guiding the IVS, as follows:

- *Strengthening the character of places through sustainable development.* In consideration of the projected 198.3% increase in the number of households in Colma, and the physical and regulatory constraints of Colma's cemetery uses along El Camino Real, the growth pattern would run counter to this objective. Colma's limited amount of non-cemetery land would have to be considered for residential development only, thereby reducing land use diversity and threatening community character while increasing significant impacts to public services.

- *Location of future housing and jobs next to transit, amenities and services.* As mentioned previously, the projected number of households in the "unconstrained" IVS would require land not located in the vicinity of existing

transit, services or amenities to be used for higher-density housing. Such areas are largely underserved by transit and would require significant improvements to infrastructure and services to minimize the impacts of residential development. This scenario would potentially increase greenhouse gas emissions and would increase the need for significant transit and infrastructure improvements.

Colma does not have the in-depth knowledge of other jurisdictions to provide suggestions of where else the housing could be located.

5. **What are the challenges for your local jurisdiction to attract and retain jobs that match your local workforce?**

The projected 198.3% increase in Colma households during the 25-year planning period is far more than the projected overall Bay Area household increase of 33.8%. Finding appropriate land to provide for this considerable increase in households will certainly impact the existing job-creating commercial lands. Conversion of commercial lands for residential use will detrimentally impact Colma's ability to attract job-creating businesses.

In closing, the Colma sees the "unconstrained" scenario as unrealistic and unattainable, given the significant constraints of providing and protecting lands associated with cemetery uses while meeting the stated objectives in the IVS. We hope that our very real constraints will be carefully considered and taken into account in developing the scenario to be used in the Sustainable Communities Strategy.

Sincerely,

Laura Allen
City Manager

cc: Mayor and City Council
Colette Meunier, AICP, Acting City Planner
Richard Napier, San Mateo City/County Association of Governments
Joseph Kott, San Mateo City/County Association of Governments.

ATTACHMENT A

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Brian Dossey
Director of Recreation Services
Lori Burns
Human Resources Manager

May 19, 2011

SENT ELECTRONICALLY

Ms. Marisa Raya
Association of Bay Area Governments
P.O. Box 2050
Oakland, CA 94604

RE: Comments on the draft Initial Vision Scenario

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El Camino Real (ECR) through Colma as a "Mixed-Use Corridor" place type. This designation is appropriate for those areas in close proximity to either the Colma and SSF BART stations, and is consistent with Colma's General Plan. However, from the BART

crossing south to Mission Road, most of the land along ECR is in cemetery use and not available for redevelopment as mixed use. Therefore, the Mixed-Use place type is appropriate in Colma only next to the two BART stations..

2. What transportation improvements would help support those Priority Development Area(s), Growth Opportunity Area(s) in your jurisdiction?

The projected household growth in Colma, particularly if developed throughout the jurisdiction and not just focused along El Camino Real, would require significant improvements to transit systems.

3. What additional funding would be needed to support housing growth?

The projected housing growth would require significant infrastructure investments, including, but not limited to, improvements to public safety, schools, parks, transit, roads, and other utility infrastructure. Compact, transit oriented growth would occur mostly on lands currently designated for commercial use, and potentially impact sales tax generation on these lands. Colma relies heavily on sales tax revenues to fund its services, and a negative impact on tax-generating land uses would jeopardize Colma's ability to continue to provide municipal services.

4. If the Initial Vision Scenario growth estimate is too high, should some of the growth be shifted to another part of your jurisdiction, elsewhere in the County, or elsewhere in the region?

Colma has areas near the Colma BART station and South San Francisco BART station that are appropriate for mixed-use and higher-density residential development and these areas have been identified in Colma's General Plan for such development. However, these limited areas appropriate for compact, transit oriented use are not sufficient for 912 housing units. The proposed units cannot be allocated elsewhere in the community because of land in cemetery use, and because areas along Hillside Blvd. are too far from ECR and BART stations to provide transit oriented development. Developing 912 housing units in Colma would violate the overall objectives guiding the IVS, as follows:

- *Strengthening the character of places through sustainable development.* In consideration of the projected 198.3% increase in the number of households in Colma, and the physical and regulatory constraints of Colma's cemetery uses along El Camino Real, the growth pattern would run counter to this objective. Colma's limited amount of non-cemetery land would have to be considered for residential development only, thereby reducing land use diversity and threatening community character while increasing significant impacts to public services.

- *Location of future housing and jobs next to transit, amenities and services.* As mentioned previously, the projected number of households in the "unconstrained" IVS would require land not located in the vicinity of existing

transit, services or amenities to be used for higher-density housing. Such areas are largely underserved by transit and would require significant improvements to infrastructure and services to minimize the impacts of residential development. This scenario would potentially increase greenhouse gas emissions and would increase the need for significant transit and infrastructure improvements.

Colma does not have the in-depth knowledge of other jurisdictions to provide suggestions of where else the housing could be located.

5. What are the challenges for your local jurisdiction to attract and retain jobs that match your local workforce?

The projected 198.3% increase in Colma households during the 25-year planning period is far more than the projected overall Bay Area household increase of 33.8%. Finding appropriate land to provide for this considerable increase in households will certainly impact the existing job-creating commercial lands. Conversion of commercial lands for residential use will detrimentally impact Colma's ability to attract job-creating businesses.

In closing, the Colma sees the "unconstrained" scenario as unrealistic and unattainable, given the significant constraints of providing and protecting lands associated with cemetery uses while meeting the stated objectives in the IVS. We hope that our very real constraints will be carefully considered and taken into account in developing the scenario to be used in the Sustainable Communities Strategy.

Sincerely,

Laura Allen
City Manager

cc: Mayor and City Council
Colette Meunier, AICP, Acting City Planner
Richard Napier, San Mateo City/County Association of Governments
Joseph Kott, San Mateo City/County Association of Governments.

TOWN OF LOS GATOS

OFFICE OF THE TOWN MANAGER
(408) 354-6832
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CIVIC CENTER
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LOS GATOS, CA 95031

June 13, 2012

Mr. Ken Kirkey
Director, Planning and Research
Association of Bay Area Governments
P.O. Box 2050
Oakland, CA 94604-2050

Mr. Chris Augenstein
Deputy Director, Planning
Valley Transportation Authority
3331 N. First Street
San Jose, CA, 95134-1906

RE: Response to April 18, 2012, VTA Cores, Corridors, and Station Areas PDA Designation within Los Gatos

Dear Mr. Kirkey and Mr. Augenstein:

At a June 12, 2012 Special Meeting of the Town Council, the Los Gatos Town Council held a Study Session and considered the VTA's proposal to include two Potential Priority Development Areas (PDAs) associated with the Cores, Corridors, and Station Areas program in Los Gatos. The Council unanimously directed staff to inform VTA and ABAG that while the Town continues to support the Cores, Corridors, and Station Areas program it cannot support the designation of either Planned or Potential PDAs within its jurisdiction at this time with the information currently available. The Town Council is aware that the OBAG Project Selection Criteria and Programming Policy will limit the Town to only Cycle 2 transportation funding from the 30 percent portion dedicated to non-PDA related projects.

The Town of Los Gatos requests that all references to the Los Gatos PDA's be removed, and if final adjustments are made to the "Jobs-Housing Connection Scenario" Housing Distribution by Jurisdiction projections, that the Town's Housing Unit number better reflect the elimination of the Potential PDA's in Los Gatos.

Finally, the Town recognizes and appreciates ABAG, MTC, and VTA's efforts towards developing practical procedures and criteria for implementing the OBAG program requirements. However, the Town continues to recommend developing and implementing policies and potential revisions during the next funding cycle that recognizes the needs and constraints of smaller, generally built–out communities and retain local discretion and controls for local land use decisions.

If you have any questions, please feel free to contact Community Development Director Wendie Rooney at 408-399-5768, Parks and Public Works Director Todd Capurso at 408-399-5770, or me at 408-354-6832.

Sincerely,

GREG LARSON
Town Manager

GL/jj

cc: Town Council
Wendie Rooney, Director of Community Development
Todd Capurso, Director of Parks and Public Works

N:\MGR\AdminWorkFiles\2012 Letters - Manager\ABAG PDA Response Letter.Jun13.2012.doc

Regional Transportation Plan Checklist
(Revised February 2010)

(To be completed electronically in Microsoft Word format by the MPO/RTPA and submitted along with the draft RTP to Caltrans)

Name of MPO/RTPA: Metropolitan Transportation Commission & Association of Bay Area Governments

Date Draft RTP Completed: March 22, 2013

RTP Adoption Date: Anticipated July 18, 2013

What is the Certification Date of the Environmental Document (ED)? July 19, 2013

Is the ED located in the RTP or is it a separate document? Separate

By completing this checklist, the MPO/RTPA verifies the RTP addresses all of the following required information within the RTP.

Regional Transportation Plan Contents

		Yes/ No	Page #
	General		
1.	Does the RTP address no less than a 20-year planning horizon? (23 CFR 450.322(a))	Yes	62
2.	Does the RTP include both long-range and short-range strategies/actions? (23 CFR part 450.322(b))	Yes	67-93 and online project database www.bayarea2040.com
3.	Does the RTP address issues specified in the policy, action and financial elements identified in California Government Code Section 65080?	Yes	62-93, 121-133 and in the Plan Bay Area (PBA) Financial Assumptions report
4.	Does the RTP address the 10 issues specified in the Sustainable Communities Strategy (SCS) component as identified in Government Code Sections 65080(b)(2)(B) and 65584.04(i)(1)? **(MPOs only)**		
	a. Identify the general location of uses, residential densities, and building intensities within the region? **(MPOs only)**	Yes	143-154
	b. Identify areas within the region sufficient to	Yes	143-154 and in the PBA Draft Forecast of

house all the population of the region, including all economic segments of the population over the course of the planning period of the regional transportation plan taking into account net migration into the region, population growth, household formation and employment growth? (**MPOs only**)		Jobs, Population & Housing
c. Identify areas within the region sufficient to house an eight-year projection of the regional housing need for the region pursuant to Government Code Section 65584? (**MPOs only**)	Yes	Regional Housing Need Allocation Process Methodology for 2014-2022, *Attachment A*
d. Identify a transportation network to service the transportation needs of the region? (**MPOs only**)	Yes	67-93
e. Gather and consider the best practically available scientific information regarding resource areas and farmland in the region as defined in subdivisions (a) and (b) of Government Code Section 65080.01? (**MPOs only**)	Yes	140-142
f. Consider the state housing goals specified in Sections 65580 and 65581? (**MPOs only**)	Yes	See link in 4.c above. Final report July 2013
g. Utilize the most recent planning assumptions, considering local general plans and other factors? (**MPOs only**)	Yes	p. 42 - 55
h. Set forth a forecasted development pattern for the region, which, when integrated with the transportation network, and other transportation measures and policies, will reduce the greenhouse gas emissions from automobiles and light trucks to achieve, if there is a feasible way to do so, the greenhouse gas emission reduction targets approved by the ARB? (**MPOs only**)	Yes	Development: 143-154 Transport network & policies: 67-93 Emission reductions: 96
i. Provide consistency between the development pattern and allocation of housing units within the region (Government Code 65584.04(i)(1)? (**MPOs only**)	No	See link in 4.c above. Final report July 2013
j. Allow the regional transportation plan to comply with Section 176 of the federal Clean Air Act (42 U.S.C. Section 7506)? (**MPOs**	Yes	Draft Transportation Air Quality Conformity Analysis for Plan Bay Area & the 2013 Transportation Improvement

	only)		Program P 21-22
4.	Does the RTP include Project Intent i.e. Plan Level Purpose and Need Statements?	Yes	1-9
5.	Does the RTP specify how travel demand modeling methodology, results and key assumptions were developed as part of the RTP process? (Government Code 14522.2) (**MPOs only**)	Yes	Draft Summary of Predicted Traveler Responses
	Consultation/Cooperation		
1.	Does the RTP contain a public involvement program that meets the requirements of Title 23, CFR part 450.316(a)?	Yes	Public Participation Plan for Plan Bay Area Spring 2011 Public Outreach Public Comments Memo and Full Report A new round of Public Outreach is underway now and will be summarized in June 2013
2.	Did the MPO/RTPA consult with the appropriate State and local representatives including representatives from environmental and economic communities; airport; transit; freight during the preparation of the RTP? (23CFR450.316(3)(b))	Yes	MTC and ABAG consulted with cities, counties, ports (freight and airport), transit agencies, members of the Bay Area Business Coalition, and environmental stakeholders and agencies. See also Public Participation Plan
3.	Did the MPO/RTPA who has federal lands within its jurisdictional boundary involve the federal land management agencies during the preparation of the RTP?	Yes	Federal agencies are included in our distribution list for the Plan Bay Area development process
4.	Where does the RTP specify that the appropriate State and local agencies responsible for land use, natural resources, environmental protection, conservation and historic preservation consulted? (23 CFR part 450.322(g))	Yes	Local and state agencies governing land use, natural resources, environmental protection & conservative are included in our distribution list for the Plan Bay Area development process. Also, the maps included in the plan were developed relying on data from many of those agencies.
5.	Did the RTP include a comparison with the California State Wildlife Action Plan and (if available) inventories of natural and historic resources? (23 CFR part 450.322(g))	No	Data was used from the following sources: CA Department of Conservation, Farmland Mapping & Monitoring Program, Bay Area Protected Areas Database, Bay Area Open Space Council, 2012; California State Park Boundaries, 2012; Williamson Act Program,

			California Department of Conservation, 2006; The Conservation Lands Network, 2012 and U.S. Fish and Wildlife Service, 2012, ESA, 2012; Cal-Atlas Geospatial Clearinghouse, 2012. See Chapter 2.3 Land Use and Physical Development of the Plan Bay Area EIR for more detail.
6.	Did the MPO/RTPA who has a federally recognized Native American Tribal Government(s) and/or historical and sacred sites or subsistence resources of these Tribal Governments within its jurisdictional boundary address tribal concerns in the RTP and develop the RTP in consultation with the Tribal Government(s)? (Title 23 CFR part 450.316(c))	Yes	Consulted with Tribes on 6/9/11, 3/20/12, and 4/19/13
7.	Does the RTP address how the public and various specified groups were given a reasonable opportunity to comment on the plan using the participation plan developed under 23 CFR part 450.316(a)? (23 CFR 450.316(i))	Yes	4, 6, and 24 See also #1 above
8.	Does the RTP contain a discussion describing the private sector involvement efforts that were used during the development of the plan? (23 CFR part 450.316 (a))	Yes	4, 6, and 24 See also #1 above
9.	Does the RTP contain a discussion describing the coordination efforts with regional air quality planning authorities? (23 CFR 450.316(a)(2)) (**MPO nonattainment and maintenance areas only**)	Yes	See Draft Transportation Air Quality Analysis for Plan Bay Area and 2013 TIP and Air Quality chapter (chapter 2.2) in EIR
10.	Is the RTP coordinated and consistent with the Public Transit-Human Services Transportation Plan?	Yes	p. 70 and COORDINATED PUBLIC TRANSIT–HUMAN SERVICES TRANSPORTATION PLAN
11.	Were the draft and adopted RTP posted on the Internet? (23 CFR part 450.322(j))	Yes	Online here
12.	Did the RTP explain how consultation occurred with locally elected officials? (Government Code 65080(D)) (**MPOs only**)	Yes	p. 24. The Public Outreach and Participation Program summarizing three-years of these meetings will be released in June. MTC and ABAG are currently completing a final round of public outreach to elected officials on the draft plan. This will conclude in May.
13.	Did the RTP outline the public participation process for the sustainable communities strategy? (Government Code 65080(E) (**MPOs only**)	Yes	See #1 above. The Bay Area conducted a fully integrated SCS/RTP planning process called Plan Bay Area

Modal Discussion

1.	Does the RTP discuss intermodal and connectivity issues?	Yes	The RTP relies on an integrated transportation network and these studies: Transit Connectivity Study, Regional Rail Plan
2.	Does the RTP include a discussion of highways?	Yes	p. 71-73, 78, 80-82, 92-93

3.	Does the RTP include a discussion of mass transportation?	Yes	68-71, 75-77, 79, 88-91
4.	Does the RTP include a discussion of the regional airport system?	Yes	The RTP relies on the following studies for airport planning Regional Airport System Planning Analysis **and the** Regional Aviation Activity Tracking Report
5.	Does the RTP include a discussion of regional pedestrian needs?	Yes	p. 6 of Local Street and Road Needs and Revenue Assessment
6.	Does the RTP include a discussion of regional bicycle needs?	Yes	p. 7 of Local Street and Road Needs and Revenue Assessment
7.	Does the RTP address the California Coastal Trail? (Government Code 65080.1) **(For MPOs and RTPAs located along the coast only)**	No	The RTP and its associated documents does not make specific mention of the California Coastal Trail. County bicycle and pedestrian plans may account for this route.
8.	Does the RTP include a discussion of rail transportation?	Yes	68-71, 75-77, 79, 88-91 See also #1 above
9.	Does the RTP include a discussion of maritime transportation (if appropriate)?	Yes	The RTP includes an analysis of all transit operators, including Golden Gate and Water Transit Authority ferry systems. Transit Operating and Capital Needs and Revenue Assessment Priority ferry projects are included on p. 89
10.	Does the RTP include a discussion of goods movement?	Yes	The RTP relies on the following study for good movement http://www.mtc.ca.gov/planning/rgm/final/Final_Summary_Report.pdf and will look to the State goods movement plan under development to inform future planning efforts.

Programming/Operations

1.	Is a congestion management process discussed in the RTP? (23 CFR part 450.450.320(b)) **(MPOs designated as TMAs only)**	N/A	MTC relies on adopted board action regarding the CMP process. This process will be updated after the adoption of the RTP/SCS in July
2.	Is the RTP consistent (to the maximum extent practicable) with the development of the regional ITS architecture?	Yes	The $2.5 billion FPI program (p. 78) relies on the regional ITS architecture in

			particular.
3.	Does the RTP identify the objective criteria used for measuring the performance of the transportation system?	Yes	p. 18 – 20. See also Draft Performance Assessment Report
4.	Does the RTP contain a list of un-constrained projects?	No	The draft plan relies on constrained funding assumption outlined in the Financial Assumptions report which allows for adequate

Financial

1.	Does the RTP include a financial plan that meets the requirements identified in 23 CFR part 450.322(f)(10)?	Yes	See summary on p. 62 – 66 See also Financial Assumptions report
2.	Does the RTP contain a consistency statement between the first 4 years of the fund estimate and the 4-year STIP fund estimate? (2006 STIP Guidelines, Section 19)	Yes	See Financial Assumptions report
3.	Do the projected revenues in the RTP reflect Fiscal Constraint? (23 CFR part 450.322(f)(10)(ii))	Yes	See #1
4.	Does the RTP contain a list of financially constrained projects? Any regionally significant projects should be identified. (Government Code 65080(4)(A))	Yes	See p. 80 – 81, p. 88 – 93. A complete list of financially constrained projects can be found in the Online Project Database
5.	Do the cost estimates for implementing the projects identified in the RTP reflect "year of expenditure dollars" to reflect inflation rates? (23 CFR part 450.322(f)(10)(iv))	Yes	All project costs included in YOE.
6.	After 12/11/07, does the RTP contain estimates of costs and revenue sources that are reasonably expected to be available to operate and maintain the freeways, highway and transit within the region? (23 CFR 450.322(f)(10)(i))	Yes	See #1
7.	Does the RTP contain a statement regarding consistency between the projects in the RTP and the ITIP? (2006 STIP Guidelines section 33)		See Financial Assumptions report. This will also be included in the resolution adopting the RTP
8.	Does the RTP contain a statement regarding consistency between the projects in the RTP and the FTIP? (2006 STIP Guidelines section 19)		See Financial Assumptions report. This will also be included in the resolution adopting the RTP
9.	Does the RTP address the specific financial strategies required to ensure the identified TCMs from the SIP can be implemented? (23 CFR part 450.322(f)(10)(vi) **(nonattainment and maintenance MPOs only)**	NA	All TCMs are fully implemented in the Bay Area. See See Draft Transportation Air Quality Conformity Analysis for Plan Bay Area & the 2013 Transportation Improvement Program, pgs 14-19

Environmental

1.	Did the MPO/RTPA prepare an EIR or a program EIR for the RTP in accordance with CEQA guidelines?	Yes	Draft Environmental Impact Report
2.	Does the RTP contain a list of projects specifically	Yes	See Draft Transportation Air Quality

	identified as TCMs, if applicable?		Conformity Analysis for Plan Bay Area & the 2013 Transportation Improvement Program, pgs 14-19
3.	Does the RTP contain a discussion of SIP conformity, if applicable? (**MPOs only**)	Yes	See Draft Transportation Air Quality Conformity Analysis for Plan Bay Area & the 2013 Transportation Improvement Program
4.	Does the RTP specify mitigation activities? (23 CFR part 450.322(f)(7))	Yes	The Draft Environmental Impact Report includes mitigations for all areas of potential impact. See Executive Summary for a summary table of mitigations. Pg ES-13
5.	Where does the EIR address mitigation activities?	Yes	The Draft Environmental Impact Report includes mitigations for all areas of potential impact. See Executive Summary for a summary table of mitigations. Pg ES-13
6.	Did the MPO/RTPA prepare a Negative Declaration or a Mitigated Negative Declaration for the RTP in accordance with CEQA guidelines?		This will be done as part of the final EIR.
7.	Does the RTP specify the TCMs to be implemented in the region? (**federal nonattainment and maintenance areas only**)	All TCMs are fully implemented	Draft Transportation Air Quality Conformity Analysis for Plan Bay Area & the 2013 Transportation Improvement Program, pgs 14-19

I have reviewed the above information and certify that it is correct and complete.

(Must be signed by MPO/RTPA Executive Director or designated representative)

4/26/13
Date

Steve Heminger
Print Name

Executive Director
Title

Exhibit 1

California Demographic Forecasts: Why are the numbers over-estimated?

Prepared by City of Palo Alto

November 15, 2011

Actual California Population growth

Over the last decade, the state of California added 3.4 million people, to reach a total of 37.3 million. This was an increase of 10% over the decade. This growth rate follows the gradual slowing that started after 1990, down dramatically from the very high rates of the post-World War II era. Note that the Department of Finance's (DOF) 2007 projections reflect a very high growth perspective. The DOF numbers are currently used as the population forecasts for all state and local projects—they are not scheduled to be revised until 2013.

Table 1. California's population growth over the last five decades
(average growth from census to census)

	Census	Dept of Finance Projections (2007)
1960s	29.2	
1970s	18.5	
1980s	25.7	
1990s	13.8	
2000s	10.0	14.8
2010s		12.8
2020s		11.6
2030s		10.2

Source: US Census Bureau actual Census numbers; California Department of Finance 2007 Projections.

Recent State forecasts have been consistently over-estimated

Even after the sharp decline in growth during the 1990s, forecasters consistently tended to be overly optimistic about population growth rates through the 2000s. In 2005, the Public Policy Institute of California issued a report ("California 2025: Taking on the Future") that included the population projections of all the key demographic forecasters. The consensus forecast from this group was some 40% higher than the actual outcome for the state:

Table 2. California Population Forecasts for 2010 made before 2005

(Percentage growth expected from 2000-2010)	
California Dept of Finance	15.2
USC Population Dynamics	11.6
UC Berkeley (Lee, Miller)	13.9*
Public Policy Institute of CA	15.2*
CCSCE	17.2
UCLA Anderson Forecasting	16.6
Average of six 2005 forecasts	15.0

*=center point of band

Source: Public Policy Institute of California, "California 2025: Taking on the Future", 2005, Page 29.

The consensus forecast was some 50% above the actual numbers. The only forecaster who produced a number below the actual 10% growth was the UC Berkeley group who stated that there was a 5% chance that the growth rate would be lower than 7.1%. The 2005 PPIC Report stated that "Recent trends make population projections for California especially difficult...For these reasons, planners should consider alternative population scenarios ... as useful alternatives for planners." (PPIC, 2005, pages 27-28)

Even as late as the end of 2009, on the eve of the decennial census, estimates by the California Dept. of Finance (the organization responsible for the numbers that are used for all state allocation formulas) remained strikingly high at 14.1% which was 1.5 million or 44.7% above the above the contemporaneous and more accurate Census Bureau's Current Population Estimates.

Critical Components of Change and the Future

The Census data provide a nice detailed perspective on the actual components of change during the decade. While the 3.1 million people added through natural increase (births minus deaths) were the largest single growth factor, the 2 million net gain from foreign immigration was important in overcoming a net outflow of 1.6 million from native born emigration, primarily to other states.

Table 3. Components of Population Change in California, 2000-2010

(millions of people)	
Births	**+5.45**
Deaths	**-2.35**
Net Domestic migration	**-1.63**
Foreign immigration	**+2.58**
Foreign emigration	**-0.59**
Military, etc	**-0.07**
TOTAL	**+3.38**

Source: USC, Population Dynamics Research Group, "What the Census would show", February 2011.

The challenge for projecting change in the future is the dramatic shifts in some of these base categories. With the aging population, we know that, even with slight increases in longevity, the aging population in California will raise the annual number of deaths in California from 271K in 2011 to 462K in 2039, while the number of births will rise slightly from 532K in 2011 to 551 in 2039. The natural increase will fall from some 260K today to 90K in 2040.

Thus, over time any increase in California's population will increasingly rely on migration. Since net domestic migration has averaged a net outflow of some 160K per year since the early 1990s, any growth in population will be increasingly dependent on foreign migration. (Source: USC, Population Dynamics Groups, April 2011).

There is little reason to see a major shift in domestic migration with California's high cost and high unemployment rate. That leaves foreign migration as the critical component source of long-term population growth. The most dynamic source for California's growth has been immigration from Mexico, both legal and illegal. All observers (The Dept of Homeland Security, the Pew Charitable Trust Hispanic Center, and the Mexican Migration Project at Princeton) agree that net immigration from Mexico has been down dramatically in recent years with the stricter enforcement of border crossing and the prolonged recession in the US. Pew estimates that the illegal immigrant population in the US fell by some 7% between 2007 and 2010. The important debate about the future is whether this is a business cycle phenomenon or part of a longer term trend.

The group that has the best data source and takes the longer term look is the Mexican Migration Project at Princeton. For decades they have been tracking migration patterns from Mexico and doing annual surveys of thousands of families from migration centers in Mexico. They found that the percent of first time immigrants from the Mexican communities of highest immigration fell from 1.2% of adults in 2000 to 0.6% in 2005 to zero in 2010. They identify that the changes are due to Mexican demographic and

economic factors as much as from U.S. conditions. They identified five internal factors of change in Mexico:

- Fertility rates are falling dramatically from 6.8 births per women in 1970 to 2.8 in 1995 to 2 in 2010 (replacement level).
- The number of young people entering the labor market has fallen from one million a year in the 1990s to 700K today and demographic factors will bring that down to about 300K in 2030, not enough to meet local job needs.
- The rate of college attendance and college completion has doubled over the last decade, raising the career path of an increasing share of young workers.
- The wage disparity between Mexico and the U.S. is narrowing sharply with average wage gaps falling from 10:1 in the 1960s to some 3.7:1 in the early 2000s.
- The cost of migration has risen dramatically for illegal entrants, further narrowing the earnings gap.

All of these factors point to the need, at the least, of looking at alternative scenarios of population growth in California that are more sensitive to possible underlying changes in migration patterns.

Sources of Demographic projections about California

US Bureau of the Census (responsible for the decennial census and does updated estimates each year of state populations—has been much closer to actual numbers than the Cal Dept. of Finance)

California Department of Finance (responsible for state population estimates between the Census years—forecasts used as key source for state government planning). Statewide estimates for 2010 (made in 2009) were 41% higher than the 2010 Census numbers for the state, 83% over for the nine Bay Area counties and 137% higher for the three West Bay counties.

Ronald Lee, UC Berkeley, Center for Economics and Demographics of Aging, "Special Report: The Growth & Aging of California's Population", 2003 (an important report that identified the detailed assumptions that went into the Department of Finance's long-term projections).

Hans Johnson, Public Policy Institute of California, "California 2025: Taking on the Future", Chapter 2 'California's Population in 2025' (a report that gathered projections from eight academic and government sources). Johnson concluded that "population projections for California are especially difficult...In addition to overweighting contemporary trends, forecasters are notoriously bad at predicting fundamental demographic shifts... For these reasons, planners should consider alternative population scenarios." Pages 27-28.

John Pitkin & Dowell Myers, USC Population Dynamics Research Group, "The 2010 Census Benchmark for California's Growing and Changing Population", February 2011; "Projections of the Population of California by Nativity and Year of Entry to the U.S.", April 2, 2011. (Pitkin and Myers had the lowest of the forecasts in the 2005 study—though still overestimating growth by 16%. They are working with the California Department of Finance on components for a new longer-term forecast; they are still assuming a net immigration number of 160,000 holding steady in the future.)

Steve Levy, Center for the Continuing Study of the California Economy

UCLA Anderson Forecasting Project

Greg Schmid

October 2011

EXHIBIT 2

City of Palo Alto
Department of Planning and Community Environment

July 11, 2012

Ms. Ashley Nguyen, EIR Project Manager
Metropolitan Transportation Commission
Joseph P. Bort MetroCenter
101 Eighth Street
Oakland, CA 94607-4700

Subject: Response to the Notice of Preparation for Plan Bay Area Draft Environmental Impact Report

Dear Ms. Nguyen:

Thank you for the opportunity to comment on the Notice of Preparation (NOP) for the Plan Bay Area Draft Environmental Impact Report (EIR). As you consider the proposed alternatives to be studied in the EIR on the Preferred Scenario, we strongly urge you to:

- Include a less aggressive and more realistic growth projection scenario.
- A growth projection scenario that reduces greenhouse gas (GHG) more effectively
- An economic feasibility study of all growth projection alternatives.

The City believes that the Preferred Scenario relies on questionable assumptions, with unrealistic and very aggressive housing and jobs projections. A less aggressive alternative growth scenario considering realities of the present and future, including economic trends and limiting constraints such as land cost and availability and infrastructure capacity, should be considered.

As the City has stated in previous comments, the Preferred Scenario should be based on a concept of identifying transit commute sheds in a way that establishes commute thresholds for locating housing nodes and employment centers. This would help to move the concept away from a city-by-city scenario to a more sub-regional approach, allowing job growth where it is most attractive for employers and near transit. Most housing could then be located where available land and costs are more affordable, but facilitating transit, bicycle or pedestrian access from the housing nodes to those employment centers. The Preferred Scenario is not based upon a sub-regional approach for reductions of commute sheds and greenhouse gas reductions, and therefore places an inordinate burden on individual cities.

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The City believes that an additional, hybrid-type alternative should be analyzed in the EIR that would achieve similar GHG reductions based upon a more realistic employment and housing growth scenario. This alternative could be based on *Alternative 3- Lower Concentrations of PDA Growth* which focuses growth on the Priority Development Areas (PDA) as well as other transit-rich areas not identified in the PDA process and *Alternative 1- No Project*, which is focused on what can reasonably be expected based on current plans and consistent with existing infrastructure. Growth in the PDAs would be of lower concentration than in *Alternative 2- Jobs-Housing Connection* and would acknowledge adopted local and regional plans, including more realistic growth projections based on historic patterns similar to what is described in the Outward Growth Scenario. This proposed hybrid alternative would, in our opinion, result in a more realistic and sub-regional focused plan that could achieve similar GHG reductions.

Thank you for your consideration of the above comments and suggestions. The City looks forward to our continued participation in the EIR process.

Sincerely,

Curtis Williams
Director
Department of Planning and Community Environment

cc: Ezra Rapport, Executive Director, Association of Bay Area Governments
Ken Kirkey, Planning Director, Association of Bay Area Governments
Palo Alto City Council
Planning and Transportation Commission
James Keene, City Manager

A44 Attachment

SB 375 Household Target Analysis								
General Area description	**MTC TAZ**	**Census Tract**	**2010 households**	**2035 households**	**# difference**	**2010 employment**	**2035 employment**	**# difference**
Bay Meadows, Rail Corridor Plan Civic Area, Fiesta Gardens	278	607500	1,586	6,701	5,115	2,654	4,769	2,115

ANALYSIS - DEVELOPMENT POTENTIAL FOR CENSUS TRACT 607500						
Bay Meadows, Rail Corridor Plan Civic Area, Fiesta Gardens (460 acres total)	Location	Dwelling Units	Retail Sq. Ft.	Office Sq. Ft.	Project/Area Acreage	Total Acreage
Existing Residential Neighborhoods, Commercial Areas and Recently Built Projects						
Bay Meadows 1					75.5	
Saratoga right of way					11.6	
Fiesta Gardens single family dwelling neighborhood and freeway commercial					141	
San Mateo County Event Center/Fairgrounds					48	
McClellan Avenue single family home area					22	
Palm Avenue low density residential and service commercial area					39	
Ironwood Townhomes	Delaware Street				1.2	
Peninsula Station	El Camino Real				1	
Sub Total						339.3
Approved Projects						
Bay Meadows 2	former Bay Meadows Race Track	1,233	93,000	750,000	83	
Delaware Place	2090 South Delaware	111			1.8	
Former Police Station Site	2000 South Delaware	120			2.1	
Sub Total		1,464	93,000	750,000		86.9
Potential Development Sites (assume 50 du/acre)						
City of San Mateo Corp Yard	Pacific Blvd	163			3.3	
AT&T site	19th Avenue	195			3.9	
F&FPlumbing	Delaware Street	50			1	
Public Storage	Delaware Street	175			3.5	
Racquet Club	Delaware Street	160			3.2	
Hillsdale Station Mixed Use (Based on Hillsdale Station Area Plan	El Camino Real	60			3.8	
Ah Sam Florist Excess Greenhouse Area	El Camino Real	88			1.8	
Sub Total		891				20.4
Grand Total Census Tract 607500		2,355	93,000	750,000		446.6
Assume remaining acreage @ 50du/acre		671				13.4
Total Future Potential Dwelling Units		3,026				460

SB 375 Household Target Analysis								
General Area description	**MTC TAZ**	**Census Tract**	**2010 households**	**2035 households**	**# difference**	**2010 employment**	**2035 employment**	**# difference**
Sunnybrae, 19th Ave Park, Rail Corridor Hayward Park Station Subarea	279	607600	1,368	3,416	2,048	4,297	6,139	1,842

ANALYSIS - DEVELOPMENT POTENTIAL FOR CENSUS TRACT 607600						
Sunnybrae, 19th Ave Park, Rail Corridor Hayward Park Station Subarea (328 acres)	Location	Dwelling Units	Retail Sq. Ft.	Office Sq. Ft.	Project/Area Acreage	Total Acreage
Existing Residential Neighborhoods, Commercial Areas and Recently Built Projects						
19th Avenue Park Single Fmaily Dwelling Neighborhood , Marriott Hotel, Salesforce Offices					143	
Sunnybrae Single Family Dwelling Neighborhood, South Amphlett Service Commercial Area					140	
Sunnybrae Area remainder (manufacturing area next to RR)					8.5	
Sub Total						291.5
Approved Projects						
Station Park Green	1700 S. Delaware St. (K Mart Site)	599	60,000	10,000	12	
92 & Delaware Office (Hines Offices)	1830 S. Delaware (former Denny's and Telecenter site)			276,000	2.3	
Sub Total		599	60,000	286,000		14.3
Potential Development Sites (assume 50 du/acre)						
Concar Village (based on concept plan)	Concar/Delaware (Concar Shopping Center	650	100,300	100,000	14.5	
Peninsula Corridor Joint Powers Board property @ Hayward park Station	Concar	104			2.1	
Post Office	Delaware Street	120			2.4	
AAA building	Delaware Street	54			1.1	
Sub Total		927	100,300	100,000		20.0
Grand Total Census Tract 607600		1,526	160,300	386,000		325.8
Assume remaining acreage @ 50du/acre		110				2.2
Total Future Potential Dwelling Units		1,636				328.0