

From: [Kathy Jordan](#)
To: [Fred Castro](#)
Subject: public comment on Forecast methodology
Date: Thursday, September 19, 2019 1:55:50 PM
Attachments: [Item 07C PBA50 Attachment A Regional Growth Forecast Methodology v2.pdf](#)

External Email

To ABAG:
re making a public comment on ABAG's methodology.

Referencing pages 12 and 13 in ABAG's Item 07C PBA50 Attachment A Regional Growth Forecast Methodology v2.pdf (attached).

I'd like to draw your attention to the explanation of Figure 9 on page 12 of Item 07C PBA50 Attachment A Regional Growth Forecast Methodology v2.pdf (attached), and to the actual Figure 9 on page 13, which details the commute flows from and to and within the Bay Area.

Figure 9: Commute Flows to and from the Bay Area, 2015

Note: Subregion definitions by county—West Bay-Marin, San Francisco, San Mateo; South Bay-Santa Clara; East Bay-Alameda, Contra Costa; North Bay-Napa, Solano, Sonoma

The explanation of Figure 9 on page 12:

"This is evident in Figure 9, where most commute flows into and outside the region are very small, but the largest inflows are to Santa Clara County from its southern neighbors and to Alameda County from the Central Valley, with significant impacts on those travel corridors."

Looking at Figure 9, it is evident that for all of the Bay Area subregions, the vast majority of commuters work in the same subregion in which they live. Only for those who live in the East Bay, do a significant segment of residents commute outside the subregion in which they live, but, the number of those who commute out of the East Bay to work, does not even come close to approaching 1/3 of the East Bay resident population.

Why would ABAG and the MTC be considering imposing intrusive and disruptive housing policies which benefit developers and builders via its housing goals -- in certain likely subregions of the Bay area - when the vast majority of the Bay Area's population live and work in the same subregion, according to ABAG's own analysis?

I object to ABAG and the MTC attempting to impose top down, intrusive and expansive housing goals that do not serve the needs or match the realities of the vast majority of Bay Area residents and commuters, whom ABAG and the MTC are designed to serve, and instead seem to be serving the needs of builders and developers.

Thank you.

Best,

Kathy Jordan

From: [Susan Kirsch](#)
To: [Fred Castro](#)
Subject: ABAG vote on 08-19: PBA 2050 Forecast Methodology
Date: Tuesday, September 17, 2019 4:27:15 PM
Attachments: [ABAG.ExBoard.Final.pdf](#)

External Email

Dear Fred - Please forward my email to members and alternates of the ABAG Executive Board.

Susan Kirsch, Community Organizer
415-686-4375

Dear ABAG Executive Board and Alternates:

Item 7: Staff recommendation to approve PBA 2050 Forecast Methodology

On Thursday night, September 19th, you'll be considering a staff recommendation to adopt the Regional Growth Forecast Methodology for Plan Bay Area 2050 (Resolution 08-19).

Attached and cut and pasted below is my analysis and 8 Reasons to OPPOSE the staff recommendation.

Thank you for your deliberations.

Best wishes,
Susan Kirsch
Community Organizer
415-686-4375

**8 Reasons to OPPOSE the staff recommendation 08-19
Regional Growth Forecast Methodology for Plan Bay Area 2050**

Background: In 2014, MTC/ABAG and the Building Industry Association Bay Area (BIA) signed a legal settlement. It requires ABAG to hold a public hearing on the methodology used to determine the Regional Housing Control Total. Under terms of the settlement agreement, the public hearing must be held on the same day the methodology is proposed for adoption, which must be prior to the Regional Housing Control Total being disclosed.

According to the 9/19/19 memo from Cynthia Kroll, Chief Economist and Assistant Director, the Regional Growth Forecast will be done at a later date. Kroll writes that staff sought public and stakeholder input on the Regional Growth Forecast Methodology through four public meetings. "Comments will be addressed by staff and results reported at the September 19, 2019 public hearing on the Regional Growth Forecast Methodology." Only the Methodology needs to be approved at this juncture.

Action: OPPOSE Resolution 08-19 until the Methodology discussion—including assumptions, tools, inputs and impacts—is clearly presented and discussed and the eight issues below are resolved.

8 Reasons to OPPOSE 08-19: Resolution to adopt the Regional Growth Forecast

Methodology:

1. The Regional Housing Control Total is the key element of the Methodology. There should be a definition and description in plain English, which are not provided. We know from the legal settlement agreement, Agreement 5, that all Parties agreed they don't have "legal authority to prohibit employees who live outside the region from commuting to jobs in the region. The intent of the Agreement is to ensure that the Regional Housing Control Total adopted as part of the SCS provides housing opportunities within the region to those employees projected to work within the region." In other words, it is based on a population of employees who might commute into the 9-county Bay Area, if housing were available, and assuming they wanted to live in the Bay Area.

In addition, please clarify Agreement 6.a. It seems to say that the goal is for no NEW commuters from outside nine-county Bay Area. Therefore, ALL projected new jobs need to have housing provided WITHIN the nine-county Bay Area. It seems BIA wants to use this SCS process to force housing construction within the nine-county Bay Area. BIA gets to "have its cake and eat it, too" because nothing prevents the building industry from continuing to build like crazy in Tracy, Manteca, Stockton, Modesto for "in-commuters" into the Bay Area even as it gets new entitlements to build in the Bay Area.

Before supporting the staff recommendation, please clarify the role the Regional Housing Control Total plays in the Regional Growth Forecast Methodology. How was this derived and by whom? Who will set—and what will be the basis—of jobs growth numbers. How will the Control Total be used in setting RHNA? Where is the record of public presentation and discussion about the Regional Housing Control Total?

2. Re: Attachment 3B, "Regional Growth Forecast Methodology: Comments Received, Staff Response."

Staff Comment #1 to Greg Schmid, says "*The Regional Growth Forecast is driven by assumptions about national employment and population growth.*" Later, in direct contradiction (Staff Comment #19 to Paul Martin), staff writes, "*ABAG/MTC are required to develop a reasonable Regional Growth Forecast based on actual conditions.*" Which is it?

Given that SB375, the basis of PBA2050, requires a Regional Transportation Plan and Sustainable Communities Strategy, the Forecast Methodology should serve the region. Where is the public record of a discussion of this assumption?

3. Chief Economist Cynthia Kroll's memo (9/19/19) on Regional Growth Forecast Methodology lists four public meetings that were "Opportunities for Input on the Methodology."

Attachment 3B summarizes 22 public comments. One might expect questions or comments about Methodology, but 20 of the comments are about PBA2050 in general. Staff responded with a version of "bring this up later in the process when the PBA2050 Blueprint is being crafted."

It's hard to believe four public meetings about Methodology didn't generate a single

question or comment about Methodology! There are many terms that influence Methodology that one might expect people to ask: Regional Housing Control Total, REMI, Urban Sim 2.0, Travel 1.5, BASIS, iterative process, or forecasting. Clarify what was covered in the Methodology workshops. Does the public record show discussions about the methodology tools, uses and examples of using them?

4. This ABAG ExCom meeting on 9/19/19 fulfills a legal settlement agreement with the Builders Industry Association (BIA) regarding PBA 2014. ABAG wanted to challenge the lawsuit, but MTC chose to settle.
We can imagine how the BIA, developers, real estate and financial interests benefit from the Methodology. How does MTC benefit? What is the impact on the region, the counties and communities the ABAG ExCom represents? Where is the record of public discussion about the settlement agreement and its impact on regional growth extending to 2050?
5. Staff's Regional Growth Forecast Methodology repeatedly refers to an *iterative process*, which means a process for arriving at a desired result by repeating rounds of analysis or a cycle of operations. The objective is to bring the desired decision closer to discovery with each iteration. Where is the record of public discussion about this process, including the desired result?
6. Paul Campos, BIA Senior Vice President of Governmental Affairs, (Attachment B, page 9, Comments from Jurisdictions) notes the iterative process provides opportunity to test how increased housing production could influence prices and rents. In his email of August 16th, he writes, "*. . . the region now should make every methodological decision that . . . will establish the **highest housing target for the region.***" Be reminded that BIA is the agency that filed the lawsuit in 2014. Where is the record of public discussion about this "methodological decision" for the highest housing target? Where is discussion about the jobs/housing balance? Where is the discussion re: environmental impact, especially GHG.
7. MTC/ABAG staff celebrate gathering "10,000 unique public comments" (Resolution 09-19: Approval of PBA 2050 Cross-Cutting Issues, Vision, and Guiding Principles) via pop-up events and Post-it notes. This is not a scientific method for collecting data. Elected officials and community leaders want thoughtful public discussion that follows a pattern of systematic problem solving, defined criteria, and exchanging ideas. The ABAG ExCom is being asked to adopt a staff resolution that is based on a deeply flawed and inadequate model of public input and discussion.
8. Resolution 09-19, Attachment A, describes the intended outcomes of PBA2050 "to ensure by the year 2050 that the Bay Area is affordable, connected, diverse, healthy, and vibrant for all." But it fails to focus on the key provision of SB-375: to reduce greenhouse gas emissions by creating a Regional Transportation Plan (RTP), including a Sustainable Communities Strategy (SCS). PBA 2050 is veering far off course, and now is the time for a course correction.

I urge you to oppose the staff recommendation re: **Regional Growth Forecast Methodology** until these issues are addressed. Please vote against approval of both 08.19 and 09.19.

Best wishes,

Susan Kirsch
Community Organizer
415-686-4375

8 Reasons to OPPOSE the staff recommendation 08-19 Regional Growth Forecast Methodology for Plan Bay Area 2050

Background: In 2014, MTC/ABAG and the Building Industry Association Bay Area (BIA) signed a legal settlement. It requires ABAG to hold a public hearing on the methodology used to determine the Regional Housing Control Total. Under terms of the settlement agreement, the public hearing must be held on the same day the methodology is proposed for adoption, which must be prior to the Regional Housing Control Total being disclosed.

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Action: OPPOSE Resolution 08-19 until the Methodology discussion—including assumptions, tools, inputs and impacts—is clearly presented and discussed and the eight issues below are resolved.

8 Reasons to OPPOSE 08-19: Resolution to adopt the Regional Growth Forecast Methodology:

1. The Regional Housing Control Total is the key element of the Methodology. There should be a definition and description in plain English, which are not provided.

We know from the legal settlement agreement, Agreement 5, that all Parties agreed they don't have "legal authority to prohibit employees who live outside the region from commuting to jobs in the region. The intent of the Agreement is to ensure that the Regional Housing Control Total adopted as part of the SCS provides housing opportunities within the region to those employees projected to work within the region." In other words, it is based on a population of employees who might commute into the 9-county Bay Area, if housing were available, and assuming they wanted to live in the Bay Area.

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