



*"Small Town Atmosphere
Outstanding Quality of Life"*

July 20, 2021

Submitted via electronic mail to:
eircomments@bayareametro.gov

Attn: PBA 2050 Draft EIR Comments
MTC Public Information
375 Beale Street, Suite 700
San Francisco, CA 94105

Subject: Danville Comment Letter on the Plan Bay Area 2050 Draft EIR

To Whom It May Concern:

The Town of Danville appreciates the opportunity to review and comment on the Draft Environmental Impact Report (DEIR) for the Plan Bay Area 2050 (PBA 2050) Blueprint, which serves as the Bay Area's third Regional Transportation Plan/Sustainable Communities Strategy that generates population forecasts for the accompanying Regional Housing Needs Allocation (RHNA) cycle.

Based upon our review of PBA 2050 Blueprint, DEIR and accompanying technical documents, the Town would like to submit the following comments:

- 1. PBA 2050 Regional Growth Forecast Inconsistent with Department of Finance:** The Draft PBA 2050 Blueprint projects that in the 35-year period between 2015 and 2050, the region's population would grow by 2.7 million people to 10.3 million. However, this appears to be inconsistent with the California State Department of Finance (State DOF) forecast of approximately 8.8 million people by year 2050¹.

Given that the baseline methodology used in the Regional Housing Needs Allocation (RHNA) effort incorporates future year 2050 household data from the PBA 2050 Blueprint land use model (UrbanSim2), the Town seeks clarification on impact of utilizing a forecast that appears to be 1.5 million people higher than projected by DOF.

- 2. Mismatch between Forecasted Growth and Mitigation Timeline:** As it relates to the first comment, it would also appear that the PBA 2050 land use model assumes an accelerated growth pattern during the next 8-year RHNA cycle (2023-2031). In

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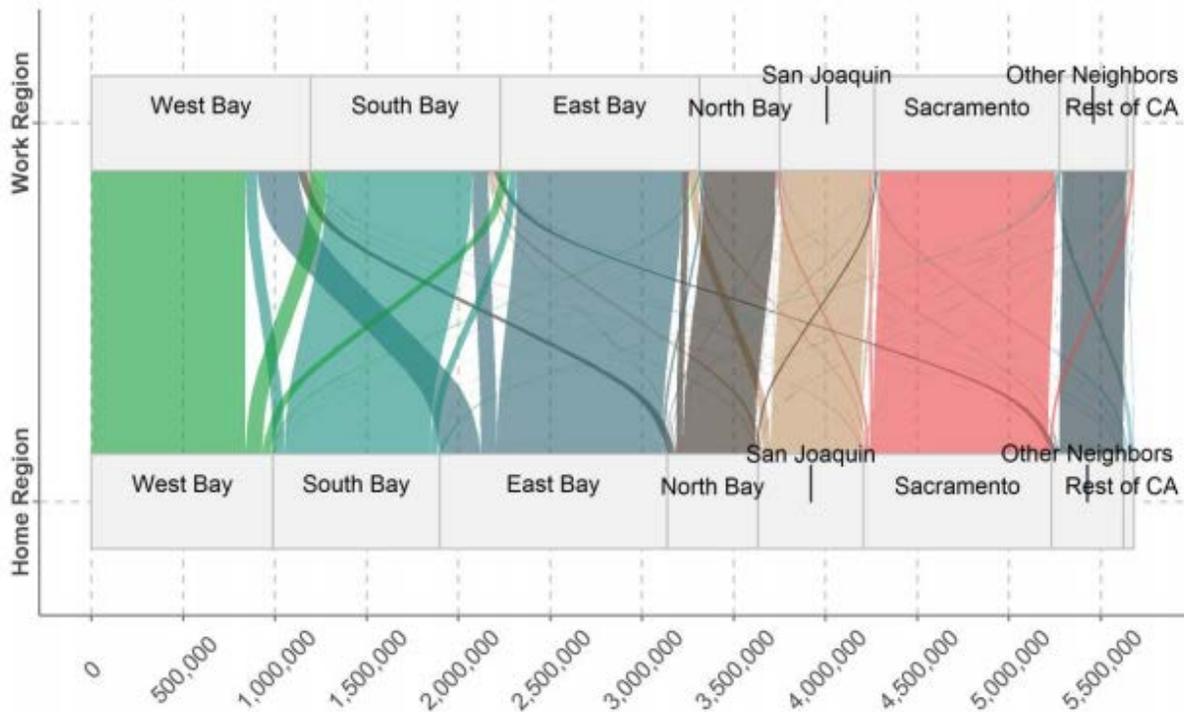
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contrast, it appears that the PBA 2050 Blueprint and its DEIR analysis assumes that nearly all of the transportation mitigation measures would not occur until the end of the horizon period – including \$591 billion in transportation investments² and assumptions of employer-mandated 40% work-from-home policies.

Since the next 8-year RHNA cycle mandates much of the projected growth without off-setting mitigation measures being implemented within the same period, it would result in significant cumulative unavoidable impacts for the local cities and counties throughout the greater Bay Area.

- Greenhouse Gas Reduction Targets:** As noted in the Town’s RHNA appeal, according to the Housing Needs Data Report produced by ABAG, the jobs-household ratio in Danville has decreased from 0.82 in 2002 to 0.81 jobs per household in 2018, far below a ‘healthy’ ratio of 1.5 jobs per housing unit advocated by the Building Industry Association. Accommodating the forecasted housing and population growth produced by the land use model used for the PBA 2050 Blueprint, without off-setting jobs growth or other mitigation measures, may necessarily cause cities such as Danville to be unable to meet mandated greenhouse gas (GHG) emissions reduction targets, resulting in another significant unavoidable impact. It would also likely require the conversion of existing limited commercial and office property in Danville for housing development, thereby continuously worsen the perpetual imbalance. Exacerbating the issue is the fact that east bay communities such as Danville continue to be greater exporters of work commuters to other areas of the region.



4. **Effects of the Pandemic** have not been adequately studied as it relates to hybrid work and its impact on driving patterns and do not correlate to the assumptions used in the forecast model. ABAG/MTC indicated that certain adjustments were made to address the effects of the pandemic as part of the Plan Bay Area 2050 projections, though it is unclear whether these adjustments reflect short-term or long-term impacts. More critically, it is unclear whether these adjustments or the forecast modeling assumptions used can be validated against post-pandemic conditions.

As an example, while most major technology firms have announced that 'hybrid' work would be allowed post-COVID, they have also made it clear that the future involves large numbers of employees working back in the office. As recently reported in the Mercury News and observed by many who commute in the 'new normal', flexible work schedules have resulted in dramatic traffic unpredictability where gridlock or free flow patterns can occur at any moment throughout the day.

These emerging patterns do not correlate to the Draft PBA 2050 Blueprint which includes environmental strategies, modeling assumptions, and conclusions on achieving GHG emission reduction targets which are predicated upon an expectation that in the future "large employers would have to ensure that no more than 40% of their workforce commutes by car on an average workday under the Plan Bay Area 2050 vision" (source: Draft PBA 2050 Blueprint, Chapter 5: Environment, p. 84).

The Town seeks clarification on the data used as the basis to reach a 40% commute-to-work assumption. Further clarification is sought on the ability of the region to meet its GHG emission target reduction.

5. **Water Resources:** Effects of drought events have not been adequately studied as the State of California – along with much of the western U.S. – are now grappling with a limited water supply from reservoirs that have never replenished due to a warm spring and early summer heat that has resulted in the snowpack simply seeping into bone-dry soils or evaporating directly into the atmosphere.

While experts debate whether these are signs of a megadrought or the beginning of a new multi-year drought event, what is clear is that the State has now declared a drought state of emergency for 50 of 58 counties. Danville's water provider, the East Bay Municipal Utility District ("EBMUD"), has declared its service area to be in Stage 1 Drought conditions and imposed a 10% voluntary demand reduction. Consequently, water supply is now a "constraint" on new development in Danville.

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Of greater importance to note is that EBMUD's Draft 2020 Urban Water Management Plan calculates water demand in drought conditions based only on population projections from Plan Bay Area 2040 (PBA 2040), not the forecasted increases in population contained in the Draft PBA 2050 Blueprint.

Thank you again for the opportunity to provide input.

Sincerely,
TOWN OF DANVILLE



Joseph A. Calabrigo
Town Manager

C: Danville Town Council, Danville Planning Commission

¹ Source: California State Department of Finance,
<https://www.dof.ca.gov/Forecasting/Demographics/Projections/>

² Draft Technical Assumptions Report (Table 7), May 2021

