



THE CITY OF
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CALIFORNIA

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January 30, 2012

Ezra Rapport, Executive Director
Association of Bay Area Governments
P.O. Box 2050
Oakland, CA 94604-2050

RE: City of Novato Response Regarding the Alternative Vision Scenarios, including the Initial Vision Scenario, as part of the Sustainable Communities Strategy approach developed by the Association for Bay Area Governments (ABAG)

Dear Ezra:

At its January 10, 2012 meeting, the Novato City Council held a public meeting to discuss the Alternative Vision Scenarios (AVS) that ABAG has prepared for the One Bay Area Strategic Communities Strategy (SCS). The City of Novato appreciates the opportunity to comment on this important planning effort.

The City acknowledges the regional perspective of ABAG and MTC regarding the potential for creating new jobs and housing, but Novato remains extremely concerned about the loss of local control that this planning effort represents. The three new Alternative Vision Scenarios neither accommodate nor incorporate Novato's community values, existing development patterns and density. The Alternative Vision Scenarios do not recognize that Novato chose to forego designation as a Transit Oriented Development along the SMART line, whether this be a Priority Development Area (PDA) or Growth Opportunity Area (GOA), in the City.

Fundamentally, the City of Novato cannot endorse the increase in projected housing units that have been redistributed to Novato as a result of the three new Scenarios. The increase in the projected number of housing units for the City of Novato in the Initial Vision Scenario (778) has more than doubled in the three new scenarios – Focused Growth (1599), Constrained Core Concentration (1574), and Outward Growth (1605), respectively. This doubling in the projected number of housing units is not acceptable to this community, as the housing numbers for the SCS will be incorporated into the Regional Housing Needs Allocation process (RHNA).

Additionally, it is inappropriate and inequitable to assign additional housing units to the City of Novato due to another jurisdiction's implication they may need to request that their Priority Development Area (PDA) status be removed because the housing units assigned to it were too high.

For the reasons listed above, the City of Novato believes that the only appropriate scenario that reflects the development potential for new residential units and has some level of community support is the 778 units as indicated in the Initial Vision Scenario (IVS). With the change in the planning period to 2040 for the SCS, the City acknowledges the increase to 975 housing units, although there is no endorsement from the City of Novato for an additional 200 housing units.

This is an increase of 20% of housing units to Novato without any rationale regarding the increase. The housing growth projection for Novato of 975 units from 2010 to 2040 equally is an unrealistic number based on the location of the city, the suburban character of the town, and the resource base of available sites. Additional constraints are Novato's voter adopted Urban Growth Boundary (which is smaller than the Sphere of Influence adopted by Marin LAFCo for Novato) availability of water, sewer capacity, school funding and the current jobs/housing balance.

The following comments are submitted to better understand how the proposed number of housing units and projected jobs affect Novato, based upon the creation of three new Alternative Vision Scenarios:

1. The Constrained Core Concentration Scenario should reflect the constraints to growth in Novato and the projections should be close to those in the Initial Vision Scenario.
2. There needs to be a more comprehensive explanation as to why and how the number of housing units have more than doubled, and why the number of projected jobs have not significantly decreased for the planning period that ends in 2040. ABAG/MTC should provide a clear explanation of why Novato's housing projections increased while San Rafael's decreased despite substantial increases in employment projections for San Rafael.
3. It does not appear that any existing constraints were taken into consideration for the creation of the Alternative Vision Scenarios. Rather, it appears that an arbitrary distribution of a percentage of growth has been assigned to each jurisdiction and to areas around transit stations.

4. The projected employment numbers for Novato remain unrealistic given the economic conditions, the small amount of commercially zoned land in Novato, the limited availability of vacant commercial land and the high vacancy rate of retail and commercial buildings in the City.

The alternative scenarios have increased, rather than decreased, the job growth projections for Novato. Additionally, Bio-Marin has relocated its corporate headquarters to the City of San Rafael, with a loss of at least 350 jobs to the City of Novato. For this reason, the City formally requests that a reduction in 350 jobs be removed from the IVS and AVS. Job growth projections for Novato should be reduced as they were for most of the Bay Area.

5. Novato is not a Priority Development Area or a Growth Opportunity Area, nor is it geographically situated to be a higher growth area. If reallocation of growth projections for Marin occurs, any revised projections should be based on the slower growth trends in Novato enumerated above, and Novato's location away from the center of the County and the largest employment centers.

Additional growth has been allocated to PDA's and GOA's but both the jobs and housing growth projections for Novato have increased.

There needs to be a clear, easy-to-understand description of the relationship between the number of projected housing units and jobs, and how these two factors are interrelated.

6. The city believes that a 50%/50% split between the City and County of Marin for the allocation of housing units within Novato's Urban Growth Boundary inside our Sphere of Influence is appropriate and equitable. When making that distribution, please reduce the housing needs within our Sphere of Influence to coincide with our voter adopted Urban Growth Boundary.
7. It is not clear how the housing projections for San Quentin have been redistributed. Those numbers should be redistributed in the County, as that is where they are currently located, and not to Marin cities.

Based on the comment letter previously submitted by the City in response to the Initial Vision Scenario, and the new projections in the Alternative Vision Scenarios, these concluding statements are made:

1. The City of Novato supports the projected housing number and jobs as released in the Initial Vision Scenario for the planning period ending 2035. There is no support, nor is it equitable, for an increase in housing units or jobs to the City of Novato due to: 1) a reassignment from other cities; 2) a change in the allocation regarding the Sphere of Influence between the cities and County of Marin; 3) any redistribution from San Quentin; and 4) the creation of two SMART stations, especially as the City does not want additional Transit Oriented Development along the SMART line or have either a Priority Development Area or Growth Opportunity Area in our City.
2. ABAG/MTC needs to provide a clear explanation of why the job and housing growth projections for Novato increased from those in the Initial Vision Scenario to those in the Alternative Vision Scenarios.
3. The City suggests that more public workshops be held, and that these workshops are truly meant to be a conversation with the public on all of the Alternative Scenarios before the Preferred Alternative is selected.
4. The City believes that the timeline to provide comments needs to be extended. This will assist the community in better understanding the information and process, and allow staff additional time to review this information, and decipher composition of the formulas used for the creation of new jobs and housing units.
5. The City was informed, through a Marin Independent Journal article, that MTC believes that San Rafael's housing allocation in the Initial Vision Scenario were disproportionate ([HTTP://WWW.MARINJ.COM/CI_19739446](http://www.marinj.com/ci_19739446)). This apparently resulted in a higher allocation of the housing projections to the City of Novato in the Alternative Vision Scenarios. Please provide an explanation of how the disproportionate allocation to San Rafael affected the City of Novato's housing allocation.

On behalf of the Novato City Council, thank you for the opportunity to provide input on the Alternative Vision Scenarios and we hope that the preferred Alternative will incorporate our comments.

Sincerely,



Denise Athas, Mayor

c: City Council
City Manager
City Attorney
Planning Commission
Metropolitan Transportation Commission, Attn: Steve Heminger
League of California Cities, Attn: Dan Carrig
Transportation Authority of Marin, Attn: Dianne Steinhauser