

December 16, 2025

Metropolitan Transportation Commission (MTC)
Association of Bay Area Governments (ABAG)
375 Beale Street, Suite 700
San Francisco, CA 94105
Email: eircomments@bayareametro.gov and info@bayareametro.gov

Regarding: Plan Bay Area 2050+ Draft Environment Impact Report (DEIR)

Dear MTC and ABAG Board Members,

Thank you for the opportunity to comment on the Plan Bay Area 2050+ Draft Environment Impact Report (the Plan). Neighborhoods United San Francisco (NUSF) is a coalition of long-established neighborhood groups, civic organizations, and merchant associations that partners with communities and neighborhoods throughout the city to promote equitable growth, protect valuable resources, provide for public input, and prevent displacement.

For the reasons set forth below, we believe the Plan is based on flawed and inaccurate assumptions that therefore lead to misleading conclusions for the nine-county Bay Area region. The failure to legitimately assess future population and employment trends must be corrected prior to issuing the Final EIR.

MTC/ABAG Growth Forecasts for the Bay Area are Overstated and Significantly Diverge from Standard and Recognized Projection Practice

Using growth projections developed in-house MTC/ABAG forecast a Bay Area population increase of 24.1% from 2025 to 2050: a projection nearly 10 times greater than the growth rate for the rest of California (2.5%). Based on a number of faulty assumptions, the MTC/ABAG forecast far exceeds the population growth projected by the state's own Department of Finance (DOF), Demographic Research Unit (DRU), of 6.4% Bay Area growth from 2025 to 2050. The DRU is the official source of demographic data for the State of California, and California law requires DRU projections be used for specific purposes, including for the allocation of state funds.

In an analysis of the MTC/ABAG growth projections by independent researcher Gaetan Lion, he identifies their omission of the three fundamental demographic drivers that determine population change: births, deaths, and net migration. Lion further reveals that the MTC/ABAG Regional Growth Forecast relies exclusively on a model known as the

REMI (Regional Economic Models, Inc.) Policy Insight+ model, which is an economic model, not a demographic one and states that:

MTC/ABAG's Plan Bay Area 2050+ projections suffer from a cascade of unrealistic assumptions that compound into a fundamentally flawed forecast. The problems operate on multiple levels, each reinforcing the others to produce projections divorced from reality.

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The path forward requires intellectual honesty. MTC/ABAG should return to first principles: What do the region's demographic fundamentals actually suggest? What employment growth is realistic given structural economic changes? What migration patterns are sustainable given housing costs and remote work trends? Only by confronting these questions directly can planners develop projections worthy of the policy decisions they will inform.

<https://medium.com/@gaetanlion/abags-bay-area-population-projections-are-way-too-high-8ac2c861fc2e>.

The REMI Model Applied by the MTC/ABAG Avoids Full Accounting of the Impacts from a High Office Vacancy Rate, Remote Work Opportunities, and the Potential for Job Loss Due to Artificial Intelligence (AI).

The MTC/ABAG methodology does not fully take into account the conditions of the Bay Area work force. Commercial vacancy rates remain high in the region as a roughly 30% office vacancy rate in San Francisco demonstrates. Nor does the MTC/ABAG approach adequately account for this soft office market combined with the sustained popularity of remote work, leading to out migration in a housing market as expensive as the Bay Area. Finally, the impacts of AI and the very real prospect of job loss in myriad sectors, has not been incorporated into these overly optimistic projections.

Conclusion

The application of non-standard growth projections and resulting inconsistencies raise serious concerns about the plausibility of the Draft Plan's regional assumptions. For these reasons, we believe MTC/ABAG must use standard and accepted modeling methodologies, such as those from the California Department of Finance (DOF) and Demographic Research Unit (DRU), to forecast realistic demographic and employment projections. A revised forecast will also include inclusion of the region's office vacancy rates, remote work trends and impacts to the work force from AI. The unrealistic growth

projections upon which this Plan is based threaten the functionality, effectiveness and fiscal health of every municipality required to comply. The DEIR must be revised accordingly.

Thank you for the opportunity to comment.

Sincerely,
Lori Brooke
Co-founder, Neighborhoods United SF

cc:
Rafael Mandelman, President, SF Board of Supervisors
Supervisor Connie Chan
Supervisor Stephen Sherrill
Supervisor Danny Sauter
Supervisor Alan Wong
Supervisor Bilal Mahmood
Supervisor Matt Dorsey
Supervisor Myrna Melgar
Supervisor Jackie Fielder
Supervisor Shamann Walton
Supervisor Chyanne Chen