



July 20, 2021

MTC Public Information
Attn.: Draft EIR Comments
375 Beale Street, Suite 800
San Francisco, CA 94105
Email: eircomments@bayareametro.gov

RE: Plan Bay Area 2050 - Draft Environmental Impact Report

To Whom It May Concern,

Thank you for the opportunity to review the Plan Bay Area 2050 Draft Environmental Impact Report (“DEIR”). The City appreciates Plan Bay Area’s 30-year vision to create a Bay Area that is affordable, connected, diverse, healthy, and vibrant for all residents. However, the City of Dublin offers the following notable concerns:

1. On page 2-30, the DEIR states that more information on the regional growth forecast is available on the www.planbayarea.org website. The Draft Plan breaks up the Bay Area into 34 subcounty areas, called super-districts, which are a combination of cities, towns, and unincorporated areas. The City of Dublin is located in a super-district which also includes Livermore, Pleasanton, San Ramon, and Sunol. However, there is no document on the website that describes the growth forecasts specifically for the City of Dublin and growth forecasts are limited to super-districts or counties. In particular, the City of Dublin should have access to the number of housing units and employees by type assumed for the year 2050 within the City, as well as the same information for Priority Development Areas (PDAs) within the City, and detailed mapping that clearly shows the boundaries of the PDAs.
2. Figure 3.11-1 (Urban Land and Open Space) does not identify Urban Limit Lines. In 2000, the Dublin City Council adopted Resolution No. 209-00, establishing an Urban Limit Line within the Western Extended Planning Area to protect land from development for a period of 30 years. In 2014, the City Council adopted the Dublin Open Space Initiative, removing the 30-year sunset clause for the Urban Limit Line in the Western Extended Planning Area, and establishing an additional Urban Limit Line along the eastern edge of the Eastern Extended Planning Area to protect approximately 3,828 acres of land known as the Doolan-Collier Canyons from development. In addition to updating the map, the corresponding tables, such as Table 3.11-2: Acreage of parks and Open Space, should be updated.

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3. Figure 3.11-3 (Access to Parks and Open Space Lands) does not appear to accurately reflect existing parks within Dublin. Specifically, the Dublin Sports Grounds, Don Biddle Community Park, and Wallis Ranch Community Park do not appear to be identified. A complete list of park facilities is included in Figure 3 of the Parks and Recreation Master Plan, which is available at: <https://dublin.ca.gov/DocumentCenter/View/5063/Park-and-Recreation-Master-Plan---2015-Update?bidId=>. In addition to updating the map, the corresponding tables, such as Table 3.11-2: Acreage of Parks and Open Space, should be updated.

Please note the City also issued a letter, dated July 20, 2021, expressing issues and concerns with the Draft Plan and Draft Implementation Plan, specifically the Draft Forecasting and Modeling Report and the Draft Transportation Projects List. See attachment.

Should you have any questions, please do not hesitate to contact Michael Cass, Principal Planner, at (925) 833-6610 or Michael.Cass@dublin.ca.gov.

Sincerely,



Michael P. Cass, Principal Planner
City of Dublin

Enc.: City Letter on Draft Plan and Draft Implementation Plan, dated July 20, 2021

CC Linda Smith, City Manager
Jeff Baker, Community Development Director
Kristie Wheeler, Assistant Community Development Director
Michael P. Cass, Principal Planner
Laurie Sucgang, Assistant Public Works Director/City Engineer
Pratyush Bhatia, Transportation and Operations Manager
Kan Xu, Senior Civil Engineer
Shannan Young, Environmental and Sustainability Manager



July 20, 2021

MTC Public Information
 Attn.: Plan Bay Area 2050
 375 Beale Street, Suite 800
 San Francisco, CA 94105
 Email: info@planbayarea.org

RE: Plan Bay Area 2050, - Draft Plan and Draft Implementation Plan

To Whom It May Concern,

Thank you for the opportunity to review the Draft Plan Bay Area 2050, Draft Implementation Plan, and Supplemental Reports. The City appreciates Plan Bay Area's 30-year vision to create a Bay Area that is affordable, connected, diverse, healthy, and vibrant for all residents. However, the City of Dublin offers the following notable concerns:

Draft Forecasting and Modeling Report

1. Figure 12 (Households per Acre by Zone, 2015) depicts the City as having zero to five households per acre. However, this depicted density is extremely low and does not accurately reflect the existing density particularly in Downtown Dublin, near the West Dublin/Pleasanton BART Station, and at the Dublin Transit Center, near the Dublin/Pleasanton BART Station. For example, the Avalon Dublin Station project, located at, 5200 Iron Horse Parkway, Connelly Station, located at 7550 Saint Patrick Way, and Dublin Station by Windsor, located at 5300 Iron Horse Parkway, have a density of 84-85 dwelling units per acre.
2. Figure 15 (Mall/Office Park Conversion Development Projects) depicts multiple concentric circles demonstrating thousands of residential developments at the I-580 and I-680 interchange. However, the map and supplemental information do not identify which malls or office parks are anticipated to be redeveloped, nor does the information clearly identify whether those properties are in Pleasanton or Dublin. The City requests this information be clarified to adequately assess the projected growth and related impacts.
3. Figure 16 (Public-Owned Land Development Projects) depicts multiple concentric circles demonstrating thousands of residential developments at the I-580 and I-680 interchange. However, the map and supplemental information do not identify which public-owned properties are anticipated to be redeveloped, nor does the information clearly identify whether those properties are in Pleasanton or Dublin. The City requests this information be clarified to adequately assess the projected growth and related impacts.

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Draft Transportation Projects List

4. The Draft Transportation Projects List identifies projects and programs to alter the demand on the transportation system or alter the supply of the transportation system. The City compared the project list in the Draft Transportation Projects List Supplemental Report with other approved transportation plans, including the Alameda County Transportation Plan (2020) and the Tri-Valley Transportation Council (TVTC) Fee Update (2021). Refer to the attached Table 1: Transportation Projects Implementation Comparison. The City identified the following notable differences:
- The funding of \$316 million for corridor and interchange improvements (Project 21-T06-019) may be adequate for planned I-580 interchange projects at Hacienda Drive, Tassajara Road, and Fallon Road, but may not be adequate for Phase 1 of the I-580/I-680 interchange and is certainly not adequate for Phase 2 of the I-580/I-680 interchange improvements. The full I-580/I-680 interchange improvement project is included in the Alameda County and TVTC plans. The City requests this funding be increased to accommodate the additional improvements cited.
 - The proposed \$5.7 billion for minor regional roadway improvements (Project ID 21-T07-056) is laudable. However, the project list lacks specificity to determine if the funding is sufficient for the Dublin Boulevard/North Canyons Parkway extension. The City requests the Plan be revised to provide breakdown of allocation for minor roadway projects.
 - The following Alameda County Transportation Plan active transportation projects are not specifically identified in the Plan Bay Area 2050 project list and should be included: 1) ID 36 Dublin/Pleasanton BART Station Active Access Improvements; 2) ID 66A Iron Horse Trail Crossing (old SPRR ROW) at Dublin Boulevard; and 3) ID 202 SR2S Improvements, Dublin.
 - The following Alameda County Transportation Plan road projects are not specifically identified in the Plan Bay Area 2050 project list and should be included: 1) ID 109 Dougherty Road Widening; 2) ID 148 Tassajara Road Widening from N. Dublin Ranch Drive to City Limit; and 3) ID 239 Downtown Dublin Streetscape Plan Implementation.

Please note the City also issued a letter, dated July 20, 2021, expressing issues and concerns with the Draft Environmental Report. See attachment.

Should you have any questions, please do not hesitate to contact Michael Cass, Principal Planner, at (925) 833-6610 or Michael.Cass@dublin.ca.gov.

Sincerely,



Michael P. Cass, Principal Planner
City of Dublin

Enc.: Table 1: Transportation Projects Implementation Comparison
City Letter on Draft Environmental Impact Report, dated July 20, 2021

CC Linda Smith, City Manager
Jeff Baker, Community Development Director
Kristie Wheeler, Assistant Community Development Director
Michael P. Cass, Principal Planner
Laurie Sugang, Assistant Public Works Director/City Engineer
Pratyush Bhatia, Transportation and Operations Manager
Kan Xu, Senior Civil Engineer
Shannan Young, Environmental and Sustainability Manager

Table 1: Transportation Projects Implementation Comparison

Plan Bay Area 2050	Alameda County Transportation Plan (2020)	Tri-Valley Transportation Council Fee Update (2021)
<p>ID 21-T06-019 Corridor & Interchange Improvements, I-580, Alameda County This program includes funding to implement Design Alternatives Assessments between the Bay Bridge Toll Plaza and SR-238; for interchange improvements at Hacienda Dr/Fallon Rd and Santa Rita Rd/Tassajara Rd; and funding for a planning study to scope interchange improvements at I-680. \$316 million</p>	<p>ID 48 I-580/Fallon/El Charro Interchange Modernization (Phase 2), Dublin/Pleasanton \$32 million</p> <p>ID 21 I-580/I-680 Interchange (Phase 1), Dublin/Pleasanton \$300 million</p> <p>ID 132 I-580/I-680 Interchange (Phase 2) \$1,200 million</p> <p>ID 147 I-580 Interchange Improvements at Hacienda, Dublin \$36 million</p> <p>ID 179 Santa Rita Road I-580 Overcrossing Widening, Pleasanton \$49 million</p>	<p>ID B-1 I-580/I-680 Interchange (Westbound to Southbound) The proposed project limits are from 1,700 feet east of the Hacienda Drive Overcrossing to 2,000 feet west of the San Ramon Road Overcrossing along I-580, and from the Amador Valley Boulevard Undercrossing to 3,400 feet south of the Stoneridge Drive Overcrossing along I-680. \$1,785.65 million</p> <p>ID C-8 Santa Rita/I-580 Interchange This project will construct a 2nd southbound left turn lane from Santa Rita onto Pimilico Drive. The left turn vehicle queue length exceeds the length of the left turn pocket and blocks the #1 southbound lane, thus reducing the Level of Service. \$10.33 million</p> <p>ID C-12 I-580 Interchange Improvements at Hacienda Drive Implement I-580 Hacienda Drive Interchange Improvements, which includes reconstructing the overcrossing to add lanes. I-580/Hacienda Drive interchange Improvements will include; reconstruction of overcrossing to provide additional northbound lane; widening of the eastbound off-ramp to include an additional lane to be used as a combined left and right turn lane; modifying signal and striping, modifying the westbound loop on-ramp; and</p>

		<p>widening of the westbound off-ramp to include a third left-turn lane. \$39.13 million</p> <p>ID C-13 I-580/Fallon/El Charro Interchange Improvements (Phase 2) Reconstruction of overcrossing to provide four-lanes in each direction with bike lanes; reconstruction of the southbound to eastbound loop on-ramp; widening of the eastbound off-ramp to provide two exit lanes with two left turn and two right turn lanes; widening of the eastbound on-ramp; widening of the westbound off-ramp to provide two left turn and two right turn lanes; and widening of the westbound on-ramp \$34.51 million</p>
<p>ID 21-T07-056 Minor Roadway Improvements, Regional This program includes funding to implement minor roadway improvements. This program generally implements projects exempt from regional air quality conformity, but it does include non-exempt local roadway widenings or extensions. Improvements include local road extensions or new lanes (less than 1/4-mile) and intersection improvements such as channelization and signalization. Example projects include improvements to Oakland Army Base, Quarry Lakes Pkwy, Decoto Rd, Dublin Blvd, El Charro Rd, and Auto Mall Pkwy (ALA); Newell Dr and Airport Junction (NAP); implementation of Envision</p>	<p>ID 47 Dublin Blvd. - North Canyons Pkwy Extension, Dublin \$164 million</p> <p>ID 110 Dublin Boulevard widening, Dublin \$7 million</p>	<p>ID C-3 Dublin Boulevard - North Canyons Parkway Extension This project will construct the street extension to connect Dublin Blvd at Fallon Road in Dublin with North Canyons Pkwy. in Livermore at Doolan Road. The preliminary phase (currently underway) of this planned project will update the project by incorporating multimodal travel, and the current State, regional, and local priorities. \$160.39 million</p>

<p>Expy program, Calaveras Blvd, and Mary Ave (SCL); Hunters Point Shipyard and Candlestick Point, Alemany Rd, and Treasure Island (SF); and Farmers Ln (SON). \$5.700 million</p>		
<p>ID 21-T11-114 Rail Service Expansion, San Joaquin County- Dublin/Pleasanton ("Valley Link") This program includes funding to implement new rail service between San Joaquin Valley and the Dublin/Pleasanton BART station, including three new stations within Alameda County and three-car trains (12 min peak headways), 2021 - 2035 \$2,910 million</p>	<p>ID 88 Valley Link \$2,142 million</p>	<p>ID C-14 Valley Link Rail (Phase 1) This project will connect Northern San Joaquin County communities to the Tri-Valley and Bay Area Rapid Transit (BART) through 41 miles of rail and 7 stations. The project will extend from the planned ACE N Lathrop Station in the San Joaquin Valley through the Altamont Pass, then readily connect with the Dublin/Pleasanton BART terminus. \$258.25 million</p>
<p>ID 21-T12-122 Express Bus, Service Expansion, I-680 This program includes funding to implement new express bus service along I-680 (on express lanes where available) between Martinez and San Jose (20 min peak headways). Improvements include bus-on-shoulder and park-and-ride facilities, 2021 – 2035 \$398 million</p>	<p>ID 135 I-680 Express Bus to Silicon Valley \$75 million</p>	<p>ID C-16 I-680 Express Bus Service This project proposes to construct capital improvements and purchase buses in order to establish an express bus service on I-680. This project requires the construction of the I-680 Express Lane Gap Closure project, closing the gap in the express lanes between Alcosta Blvd and State Route 84, in order to utilize the express lanes to avoid congestion, reduce travel time, and improve reliability, as part of an express bus service between the Tri-Valley communities and Silicon Valley. This express bus service would likely be combined with and become part of similar efforts by Contra Costa Transportation Authority (CCTA) and their Innovate 680 program, with the intent to serve the entire I-680 corridor extending</p>

		from Martinez to San Jose, utilizing buses to provide access to additional commute options, including BART, Amtrak, Caltrain, VTA light rail, local bus service, and Greyhound, for those living along the corridor. \$59.35 million
ID T12 21-T12-116 Express Lanes, Regional This program includes funding to implement express lanes through HOV lane conversions on I-80 (ALA); partial HOV lane conversions on I-80 (SOL), I-280 (SF) and US-101 (SF); freeway lane conversions on I-580 (ALA) and I-880 (ALA); new lanes on I-80 (SOL), I-680 (ALA) and US-101 (SM); new dual lanes with HOV lane conversions on SR-85 (SCL); and new dual lanes on US-101 (SCL). \$4,530 million	ID 19 I-680 Express Lanes: SR-84 to Alcosta (Phase 1 - Southbound), Dublin/Pleasanton \$260 million ID 134 I-680 Express Lanes: SR-84 to Alcosta (Phase 2 – northbound) \$228 million	ID C-7 I-680 Express Lanes - Hwy 84 to Alcosta This project will close the gap between existing and in-progress hi-occupancy vehicle (HOV) express lane projects to the north and south. The project extends for approximately nine miles on northbound I-680 through Sunol, Pleasanton, Dublin and San Ramon. \$527.57 million
	ID 36 Dublin/Pleasanton BART Station Active Access Improvements, Dublin/Pleasanton \$16 million	
	ID 66A Iron Horse Trail Trail Crossing (old SPRR ROW) at Dublin Boulevard, Dublin \$10 million	ID C-11c Iron Horse Trail, Dublin Blvd. Overcrossing \$11.60 million
	ID 109 Dougherty Road Widening Dublin, \$23 million	
	ID 148 Tassajara Road Widening from N. Dublin Ranch Drive to City Limit, Dublin \$23 million	ID B-8 Camino Tassajara/Tassajara Rd Widening Project (East of Blackhawk Drive to North Dublin Ranch Dr), Contra Costa Cty/Dublin \$39.50 million (roadway widening project) \$55.09 million (safety improvement project)

	ID 202 SR2S Improvements, Dublin \$7 million	
	ID 239 Downtown Dublin Streetscape Plan Implementation, Dublin \$40 million	
	ID 240 Technology Enhancements to connect arterials with freeways for Connected and autonomous vehicles, Dublin \$20 million	