



July 20, 2021

Bay Area Metro
Association of Bay Area Governments
Metropolitan Transportation Commission
Bay Area Metro Center
375 Beale Street | Suite 800
San Francisco, CA 94105

Subject: Plan Bay Area 2050 – Draft Plan

Thank you for the opportunity to provide comments on Draft Plan Bay Area 2050 (Plan). Livermore staff and Bay Area Metro staff have been engaged in numerous conversations about this project and we appreciate the collaborative approach to this regional planning effort. This letter includes the City's comments regarding the Growth Geographies and the Plan Strategies.

Growth Geographies

Since 2008, the City has actively participated in the Bay Area Region's Sustainable Communities Strategy. The City has two (existing) Priority Development Areas (PDA) including Downtown Livermore and the Isabel Neighborhood Specific Plan area.

The Downtown PDA is supported by a Transit Center managed by the Livermore-Amador Valley Transit Authority with rail service from Altamont Corridor Express (ACE) and a variety of local and regional bus routes. The Isabel Neighborhood Specific Plan envisions development of 4,095 new multi-family housing units, approximately 2.1 million square feet of office and neighborhood commercial retail, three new neighborhood parks, pedestrian and bike facilities, and infrastructure improvements. The Specific Plan focuses development around the future Valley Link rail station, which would be located in the median of I-580, just east of Isabel Avenue.

On September 12, 2019, City staff sent a Letter of Interest to Bay Area Metro staff designating the Southfront Road PDA. On January 13, 2020, Livermore Council authorized the Southfront-Vasco PDA designation through resolution. In July 2020, the ABAG Executive Board approved the updated PDA boundaries, which is an approximately 500-

acre area near a future Valley Link rail station in the I-580 median adjacent to Southfront Road midway between Frist Street and Vasco Road. The approved PDA includes the Arroyo Vista Neighborhood Plan, Vasco ACE Station, and areas that over time would transition into a complete, transit-oriented neighborhood with access to rail, neighborhood commercial services, and Downtown.

Based on our review of the Plan, Map 1.1 Plan Bay Area Growth Geographies includes the Southfront-Vasco PDA. However, the map does not include a proposed Valley Link Southfront Station. On May 12, 2021, the Tri-Valley – San Joaquin Valley Regional Rail Authority (Authority) adopted a resolution certifying the Valley Link Final Environmental Impact Report (SCH# 2018092027). As part of their certification, the Authority, prioritized the Southfront Station in place of the Greenville Station proposed in the Draft EIR. (More information can be found here: <https://www.vallemlinkrail.com>).

Therefore, Livermore requests Bay Area Metro revise Map 1.1 to include the proposed Valley Link Southfront Station and remove the Valley Link Greenville Station.

Strategies

In addition to the Growth Geographies, Livermore has reviewed the Plan Bay Area 2050 Strategies and have the following comments.

Fundamentally, some of the Plan Strategies, generally align with Livermore's own Goals and Policies. Specifically, many of the Environmental Strategies are consistent with Livermore Policies and current efforts related to climate action and resilience:

- Environmental - EN4. Maintain urban growth boundaries
- Environmental - EN5. Protect and manage high-value conservation lands
- Environmental - EN8. Expand clean vehicle initiatives. Expand investments in clean vehicles, including more fuel-efficient vehicles and electric vehicle subsidies and chargers

Some of the Plan's Strategies are broad and aspirational and will require additional technical analysis and refinement to translate them into policy and practice. Livermore encourages Bay Area Metro to continue to share information with cities and counties and continue community engagement efforts as a part of the implementation process. Local input and context will be important to consider for successful implementation of these regional strategies.

Livermore would be concerned with implementation of strategies that would negatively impact local revenues and funding streams without first evaluating the tradeoffs. We request additional information be provided to Livermore as the implementation of these strategies moves forward to evaluate how some of these strategies would or would not impact

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Livermore. Further, Livermore would like additional opportunities to provide further comments.

We will continue to monitor and participate in the implementation of Plan Bay Area 2050. Please continue to provide us with notices of upcoming events, milestones, meetings, and public hearings. We look forward to continued communication and collaboration with Bay Area Metro staff and the opportunity to provide additional comments throughout the planning process.

If you have any questions, please don't hesitate to contact me or Senior Planner Andy Ross at: aaross@cityoflivermore.net.

Sincerely,



Steve Stewart
Planning Manager

cc: Marc Roberts, City Manager
Paul Spence, Community Development Director
Steve Riley, Principal Planner
Andy Ross, Senior Planner