



August 10, 2020

Association of Bay Area Governments and
Metropolitan Transportation Commission
Email: info@planbayarea.org

RE: Plan Bay Area 2050 Draft Blueprint

To Whom It May Concern,

Thank you for the opportunity to review the Draft Blueprint of Plan Bay Area 2050, which integrates 25 resilient and equitable strategies from the predecessor Horizon Initiative.

The majority of the Draft Blueprint strategies will improve affordability; expand housing opportunities for low-income residents; focus growth on walkable, transit-rich communities; save lives and protect communities; and position the region for robust economic growth. However, the City of Dublin offers the following notable concerns with the strategies as currently drafted:

- **Assess Transportation Impact Fees on New Office Developments.** Applying expanded county-specific transportation impact fees on new office development could have a significant impact on new office development. The City of Dublin currently has the highest rated Pavement Condition Index in the Bay Area and a proven track record of maintaining our existing transportation infrastructure. This strategy could result in the City needing to overhaul our existing transportation impact fee structure, which already includes fees based upon the area of the City (Eastern, Western, Downtown) as well as regional fees (Tri-Valley Transportation Development Fee). An additional transportation impact fee could potentially cause office development to be financially infeasible. The City recommends that this impact fee not be imposed on jurisdictions that already impose a sub-regional transportation fee, such as the Tri-Valley Transportation Development Fee.
- **Reduce Barriers to Housing Near Transit and in Areas of High Opportunity.** Further reduction of parking requirements, project review times, and impact fees for new housing in Transit-Rich and High-Resource Areas fails to allow an opportunity to see the result of the significant amount of housing legislation from the last few years. This strategy also eliminates the ability for jurisdictions to maintain local control and assess site specific circumstances or community goals.

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- Require 10 to 20 Percent of New Housing to be Affordable. This strategy proposes to require 10 to 20 percent of new housing developments of 5 units or more to be affordable to low-income households with thresholds defined by market feasibility. This is a departure from the City's current practice to require 12.5% of new units to be affordable for projects of 20 units or more. While this strategy could result in more affordable units, it will take away local control, eliminate flexibility when evaluating a project, and eliminate the ability to respond to economic changes. The City strongly recommends that this strategy be modified to allow flexibility, such as allowing a developer to dedicate land or pay an affordable housing in-lieu fee, as these pooled resources could result in a greater number of affordable housing units.
- Maintain Urban Growth Boundaries. This strategy could impact the City's ability to amend our Urban Limit Lines to provide opportunities for additional commercial and industrial development and more local jobs. The City recommends that ABAG/MTC consider amending this strategy to allow locally-approved modifications to existing urban growth boundaries when certain conditions are met, such as improving the job-housing balance and when the loss of open space can be mitigated in another location.

In addition to the draft strategies, the Draft Blueprint is designed to accommodate 1.5 million new residential units and 1.4 million new jobs throughout the Bay Area. The Draft Blueprint 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 Village, and Sunol. Between 2015 and 2050, the Draft Blueprint allocates 3% of housing growth and 2% of job growth to our super-district. The Draft Blueprint also envisions increasing our super-district average population density from 0.8 to 1.1 (region-wide average is 1.7 to 2.2) and decrease our jobs/housing ratio from 1.7 to 1.4 (region-wide average is 1.5 to 1.34). ABAG/MTC Staff recommended that the City use the parallel Regional Housing Needs Allocation process to assess growth; however, these two parallel processes are comparing different geographic areas (cities/counties vs. super-districts) and different time periods (8 years vs. 30 years), so there is not an ability to adequately and accurately assess Plan Bay Area 2050's growth projection impacts on each jurisdiction. The City requests that the growth projections be broken down by jurisdiction, rather than super-districts.

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,



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