May 23, 2017

MTC Public Information
375 Beale Street, Suite 800
San Francisco, CA 94105

Via electronic mail to: eircomments@mtc.ca.gov

Subject: Plan Bay Area 2040, Draft Environmental Impact Report for Plan Bay Area 2040 – The Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS)

To Whom It May Concern:

The City of Dublin appreciates the opportunity to review and comment on the Draft Environmental Impact Report (EIR) for Plan Bay Area 2040. The City understands that the Draft EIR is based on the Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS) which includes a land use scenario that forecasts a development pattern for the Bay Area region between 2010 and 2040. This development pattern specifies the amount, location, density and intensity of future housing construction with an emphasis on locating housing and jobs within Priority Development Areas that are served by transit.

Dublin also appreciates that you heard our concerns outlined in the October 14, 2016 letter addressed to ABAG and MTC regarding the development potential of Dublin’s three Priority Development Areas (PDAs). The City of Dublin has three Priority Development Areas, two of which are located directly adjacent to Bay Area Rapid Transit (BART) Stations. These BART Stations represent a significant financial investment in transit in our community. The City has certified Environmental Impact Reports (EIRs) and adopted zoning to allow for both household and job growth around these transit hubs.

The Household and Employment Growth Forecasts by Jurisdiction contained in the Land Use Modeling Report (dated March 2017) reflects incremental progress in acknowledging Dublin’s PDAs. The City currently estimates that we will reach 28,245 households in advance of 2040 with 12,476 households located within our PDAs. The Land Use Modeling Report forecasts 26,500 households by 2040 with 11,000 being located within PDAs.

The City understands that under the forecasted development pattern for the region, growth is being allocated primarily to PDAs within the “Big 3 Cities” of San Jose, San Francisco and Oakland in an effort to achieve not only the State-mandated environmental goals but a number of other performance measures. While we admire the ambitious goals set for our region, we also think it is important to be realistic about actual conditions occurring in the Inland/Coastal/Delta communities, like Dublin.
In the Downtown Dublin Specific Plan PDA there are 697 existing housing units and another 440 under construction. There is additional development potential for 1,751 units within this PDA. While the timing of the remainder of these units is not currently known, the development potential exists and there is interest from the development community to construct these units. At full residential build-out, this PDA is expected to have approximately 2,800 households.

In the Dublin Transit Center/Dublin Crossing PDA there are 1,335 existing housing units at the Dublin Transit Center. Currently there is interest in constructing an additional 415 units. At Dublin Crossing there are 450 units breaking ground and future phases will provide up to 1,500 additional housing units. At full residential build-out the Dublin Transit Center/Dublin Crossing PDA has the potential for close to 3,800 housing units within ½ mile of the Dublin/Pleasanton BART Station.

The Town Center PDA is largely built out but has development potential for an additional 260 units.

As of January 1, 2017, the City of Dublin has close to 21,000 housing units and has issued an additional 127 residential units in the first quarter. While the adjusted Plan Bay Area 2040 projection of 26,500 is closer to our local projection of 28,245 it still falls a little short. With each 4-year update of Plan Bay Area 2040 we hope to have an opportunity to continue providing input so that the goals being set for the region can be reasonably compared to what is occurring locally.

Thank you again for the opportunity to provide input and for adjusting the household growth projections closer to our local projections.

Sincerely,

David Haubert
Mayor

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