October 14, 2016

Miriam Chion
Association of Bay Area Governments
Via electronic mail to: miriamc@abag.ca.gov

Ken Kirkey
Metropolitan Transportation Commission
Via electronic mail to: kkirkey@mtc.ca.gov

Subject: Plan Bay Area 2040, Draft Preferred Scenario

Ms. Chion and Mr. Kirkey:

The City of Dublin appreciates the opportunity to review and comment on the Draft Preferred Scenario for Plan Bay Area 2040. The City understands and appreciates the guiding principles of Plan Bay Area to link land use and transportation by directing development to locally identified Priority Development Areas (PDAs) in order to create a more sustainable Bay Area. Unfortunately, under the Draft Preferred Scenario, the household projections do not advance the guiding principles of Play Bay Area by failing to recognize existing and future development potential within our locally identified and adopted Priority Development Areas.

The City of Dublin has three Priority Development Area's 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 Draft Preferred Scenario fails to recognize existing conditions in these PDAs and ignores local zoning which supports additional household growth near both BART Stations.

Plan Bay Area 2040 estimates 966 units in the Dublin Transit Center/Dublin Crossing PDA at 2040. Today, there are 1,335 *existing* housing units at the Dublin Transit Center and an additional 450 units breaking ground at Dublin Crossing. Future phases of Dublin Crossing will provide up to 1,500 additional housing units. At full residential build-out of this PDA, which is expected to occur in advance of 2040, 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 Draft Preferred Scenario does not simply underestimate household growth in this PDA, it completely ignores it.

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In the Downtown Dublin Specific Plan PDA, there are 697 existing housing units and another 380 under construction. An additional 60 units have been entitled and will soon be 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.

Overall, as of January 1, 2016, the City of Dublin has over 20,000 housing units and has issued an additional 459 building permits for new residential units so far this year. While Plan Bay Area 2040 projects that Dublin will have 23,300 housing units at 2040, the reality is we will reach that number much sooner. In fact our current General Plan and various Specific Plans have a development potential of 28,245 households at full build out which could realistically be achieved within the next 24 years.

Based on the aforementioned information, we respectfully request that the household growth assumptions be adjusted to realistically align with our local projections, especially within our Priority Development Areas.

Sincerely,

David Haubert
Mayor

CC: Dublin City Council
        Christopher L. Foss, City Manager
        Linda Smith, Assistant City Manager
        Luke Sims, Community Development Director
        Jeff Baker, Assistant Community Development Director
        Marnie R. Delgado, Senior Planner