LIVERMORE
CALIFORNIA

June 1, 2017

Ken Kirkey, MTC
Miriam Chion, ABAG
Bay Area Metro Center
375 Beale Street
San Francisco, CA 94105

Dear Mr. Kirkey and Ms. Chion,

The City of Livermore has reviewed the Draft Plan Bay Area 2040 and associated Draft Environmental Impact Report (EIR). The City of Livermore submitted comments letters in September 2015 (along with other Tri-Valley Mayors), June 2016, and October 2016. The following comments build upon these previous letters.

Overall Support

The City supports the vision of Plan Bay Area to focus growth in areas served by regional transit and existing infrastructure to protect open space, reduce emissions, maintain quality of life, and support social equity. We are pleased to see that the Draft Plan retains the Priority Development Area (PDA) framework established in the original Plan Bay Area. PDAs are useful tools as they provide predictability, are voluntarily designated, and align with local planning efforts, increasing the chances of achieving the regional vision.

We are also appreciative of MTC staff for addressing our concerns with the growth forecasts for Livermore. As noted in our October 2016 letter, it is important for the forecast to reflect approved projects and those nearing approval (as of 2016), the Regional Housing Needs Allocation for Livermore, and adopted land use plans for PDA areas – at a minimum.

The City supports the Draft Plan's focus on housing production within the Bay Area as a critical component of the strategy to reduce greenhouse gas emissions while improving quality of life and economic vitality. While we support the overall vision and strategy of Plan Bay Area, regional stakeholders must not lose sight of actual growth patterns. Livermore is concerned that the strong emphasis on housing production within the Bay Area and "fix it first" strategies downplay the role of interregional dynamics and transit expansions in addressing regional challenges and global climate change.

Draft Plan

The Draft Plan makes some acknowledgement of the interregional dynamics and trade-offs associated with a "fix it first" emphasis. For example:

- "Barring action by policymakers, "in-commuting" by individuals — those who commute into the region from surrounding areas but might otherwise live closer to their jobs if they were able to find housing to suit their needs — could increase by as many as 53,000." (page 33)
- Housing affordability challenges in the Bay Area are driving many people to move east to the San Joaquin Valley and Sacramento metro area every year. Goods movement hubs have also increasingly chosen to locate farther east, taking advantage of lower land prices and wages while remaining close to the residents, businesses, and trade infrastructure of the Bay Area. "These two trends — combined with limited transportation capacity — have resulted in growing congestion, especially at the Interstate 580 Altamont Pass gateway in eastern Alameda County… neighboring counties are taking on housing and commercial development unable to occur in the highly regulated, high-cost Bay Area development market… Plan Bay Area 2040 plans for enough housing to accommodate not only the initial forecast of households but also the additional increment of projected in-commuters. At the same time, MTC is working collaboratively with the Sacramento and San Joaquin regions to improve transportation connectivity and boost the competitiveness of the 'megaregional' economy." (Page 14, "Beyond the Bay Area")
- "Plan Bay Area 2040's "fix it first" emphasis means that only 10 percent of the plan's investments are directed toward expanding capacity-constrained freeways and transit lines. This resulted in limited performance improvements for travel mode shift and public health." (page 64)

The Plan also falls short of the performance target with respect to increasing access to jobs, which is also related to the minimal attention towards transit expansions. The City appreciates these acknowledgements in the Draft Plan and suggests additional detail to elaborate on these challenges and trends, as follows.

Realities of Intra-Regional Growth and Megaregional Dynamics

The Draft Plan calls for 46 percent of the region's household growth and 44 percent of its job growth to occur in the three big cities of San Francisco, San Jose, and Oakland. This much growth in the Big Cities may be unrealistic and result in insufficient attention to where growth is actually occurring. In addition, the Plan forecasts a similar rate of growth between the Inland/Coastal/Delta and the Bayside subregions (26 and 23 percent respectively). The three Tri-Valley cities in Alameda County are expected to grow at a faster rate more comparable to the Big Cities (40 percent), adding a total of 27,600 households from 2010 to 2040.

If historic trends continue, however, the Inland/Coastal/Delta subregion will grow at faster rates than forecasted (due to the availability of relatively cheaper land for housing

development). This pattern is apparent on Map 1.2 of the Draft Plan. The Draft Plan should emphasize that the growth projections are somewhat aspirational and contingent upon voluntary/discretionary measures implemented by all cities such as rezoning for higher densities in PDAs and capping office space in job-rich places (page 41). In most cases, the projected levels of housing run counter to actual trends as housing construction has lagged behind job growth and fallen short of RHNA targets throughout the Bay Area (page 7-11).

Regardless of the growth scenario, the Draft Plan's distribution of major public transit investments favors the Bayside region, with a much smaller share to the Inland/Coastal/Delta. For example, the population of the Tri-Valley is already more than half the size of the city of Oakland and larger than the city of Fremont, but currently lacks a commensurate level of transit access, service, and connectivity. Projected growth further increases the demand for transit and other transportation infrastructure.

While Plan Bay Area 2040 must plan to meet the housing demand and assume that regional in-commuting will not increase, it is nevertheless vital to address the worsening reality of the regional in-commute, especially from the San Joaquin Valley, and the externalities these in-commuters create. As long as trends continue and Bay Area workers seek more affordable housing options in adjacent regions, in-commuting will increase. The other half of the solution must be increasing transit connectivity.

EIR Assumptions

As previously commented, the transportation and land use model driving Plan Bay Area needs to reflect market realities and local land use plans - as well as the regional vision. Relying on the visionary scenario entirely makes it difficult to rely on the land use assumptions, transportation model, and EIR overall to represent "reasonably foreseeable conditions" for tiering purposes under CEQA. It also creates challenges with evaluating the true costs and benefits of specific transportation projects.

Long-term Transit Investments and Innovation

The City supports the Plan's dedication of funding for transit operations and would also support additional resources for innovative transit solutions at the *local* level, particularly for providing connections to/from rail stations. In the Tri-Valley context, additional local bus service will not meet the existing and growing demand for *regional* job access to and from the Tri-Valley. LAVTA's recent streamlining of the bus connections to the existing BART stations have helped increase ridership, but these improvements only directly serve a small share of the population along rapid lines. For everyone else, an additional travel mode and transfer makes taking the bus to BART an unviable option. Expanding the regional rail system and increasing interregional rail connectivity will have the largest beneficial effect by far.

Interregional Coordination

A major step towards the goal for interregional rail connectivity would be a direct link between BART and ACE in Livermore, as envisioned under the *2007 Regional Rail Plan*. The Altamont Regional Rail Working Group, which includes Livermore, is working across regional lines to advance the vision for an interregional rail connection. This effort demonstrates the collaboration and innovation necessary to reach common goals. The Working Group looks forward to reaching consensus with MTC, ABAG, and other stakeholders to develop a cost-effective solution and take concerted actions as quickly as possible.

Livermore's Efforts

In addition to these efforts, Livermore is demonstrating its commitment to this strategy by planning for over 4,000 new housing units around the planned BART station at Isabel Avenue. In 2016, 64 percent of new housing units built in Livermore were townhome and condominium units at the moderate income level (based on density). These units offer a relatively affordable option for people to live within the Bay Area, which is important for meeting regional housing goals.

While increasing the housing supply in the Bay Area is a critical component of the long-term vision, catching up to the job supply will take decades. In the face of urgent transportation constraints, it is essential to increase viable transit options that connect people to jobs.

Conclusion

Plan Bay Area understandably has a focus on "fix it first," but we must not overlook the immense need to plan for and invest in transit connectivity at the regional and interregional levels. This is essential with respect to sustainable long-term development, greenhouse gas reduction goals, and megaregional goods movement. Ongoing planning efforts and the next update to Plan Bay Area must fully acknowledge the need for long-term transit investments.

Thank you for the opportunity to provide feedback on the Plan Bay Area update and EIR. Please let us know if you have any questions.

Sincerely,

Marc Roberts
City Manager