



October 14, 2016

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

Dear Mr. Kirkey and Ms. Chion,

The City of Livermore would like to submit the following comments on the Draft Preferred Scenario for the Plan Bay Area update. These comments build upon the letter submitted June 13, 2016 (attached).

1. 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. Increasing the housing supply in the Bay Area is a critical component of the long-term vision, but catching up to the job supply will take decades. In the face of urgent transportation constraints, it is essential to plan for where housing growth is actually occurring and to increase transit options that connect people to jobs. 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.
2. Accordingly, we are concerned about the accuracy of the growth forecasts for Livermore. The Tri-Valley continues to experience traffic congestion, infrastructure maintenance needs, and affordable housing shortages, and underestimating growth could have severe consequences on transit ridership and environmental goals. In addition to submitting a comment letter, the City of Livermore provided specific comments and information to MTC staff on October 7, 2016 to update the growth forecasts for Livermore. The Draft Preferred Scenario land use distribution shows Livermore as having only 31,900

households in 2040, which is unrealistically low relative to recent and reasonably foreseeable future development. At a minimum, the forecast should reflect approved projects and projects nearing approval (as of 2016) and the 2015-2022 Regional Housing Needs Allocation for Livermore (2,729 new units over 2014 levels). Upon completion of approved development projects, there will be about 31,600 households, while fully meeting the current RHNA would result in about 33,400 households total. We recommend using the adopted *2013 Plan Bay Area* projection for Livermore of 38,940 households, to reflect the current RHNA and future growth for the 18 years beyond 2022.

Furthermore, the three Priority Development Areas (PDAs) in Livermore had about 1,550 households in 2010 and will grow to at least 2,700 households upon completion of approved projects and those nearing approval. This exceeds the Draft Preferred Scenario forecast of 2,100 households within PDAs in 2040. We recommend using 4,300 households within PDAs, based on the Housing Element's Residential Land Inventory.

3. It is our understanding that initial selection of major transportation projects to include in the updated Regional Transportation Plan (RTP) has been based upon the adopted *2013 Plan Bay Area* land use assumptions. The current process and future updates should take into account local planning efforts linked to proposed transportation projects. This is particularly important in PDAs with a large share of vacant and underutilized land. For example, Livermore is preparing a PDA/Station Area Plan for the Isabel Neighborhood to complement the proposed BART to Livermore project (using MTC grant funding). The plan aims to transform the station area into a walkable, vibrant, transit-oriented neighborhood - taking advantage of vacant and BART-owned land. The plan proposes about 4,200 new dwelling units, which would be in addition to the existing and approved units mentioned above. When MTC evaluates the BART extension project, the model should reflect the City's Isabel Neighborhood Plan - not previous assumptions about growth.

Thank you for your time and consideration.

Sincerely,


Paul Spence, Community Development Director