

Appendix A:
NOP and Responses

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Edmund G. Brown Jr.
Governor

STATE OF CALIFORNIA
Governor's Office of Planning and Research
State Clearinghouse and Planning Unit



Ken Alex
Director

Notice of Preparation

April 15, 2016

To: Reviewing Agencies
Re: Isabel Neighborhood Plan
SCH# 2016042039

Attached for your review and comment is the Notice of Preparation (NOP) for the Isabel Neighborhood Plan draft Environmental Impact Report (EIR).

Responsible agencies must transmit their comments on the scope and content of the NOP, focusing on specific information related to their own statutory responsibility, within 30 days of receipt of the NOP from the Lead Agency. This is a courtesy notice provided by the State Clearinghouse with a reminder for you to comment in a timely manner. We encourage other agencies to also respond to this notice and express their concerns early in the environmental review process.

Please direct your comments to:

**Lori Parks
City of Livermore
1052 S. Livermore Avenue
Livermore, CA 94550**

with a copy to the State Clearinghouse in the Office of Planning and Research. Please refer to the SCH number noted above in all correspondence concerning this project.

If you have any questions about the environmental document review process, please call the State Clearinghouse at (916) 445-0613.

Sincerely,

Scott Morgan
Director, State Clearinghouse

Attachments
cc: Lead Agency

**Document Details Report
State Clearinghouse Data Base**

SCH# 2016042039
Project Title Isabel Neighborhood Plan
Lead Agency Livermore, City of

Type NOP Notice of Preparation

Description The City of Livermore is preparing the Isabel Neighborhood Plan (INP) to guide private and public development in the area surrounding the proposed Bay Area Rapid Transit (BART) station in the median of I-580 at Isabel Avenue. The INP will complement BART station planning and would legally function as a Specific Plan. The planning area is within the City's adopted Urban Growth Boundary (UGB). The project proposes annexation of one unincorporated property. The vision for the INP is to create a vibrant, walkable neighborhood with a mix of residential, office, retail, and recreational uses. The preliminary development levels would generate about 4,000 new households and up to 10,000 jobs. The INP will include: new land use regulation, design standards, and improvements to the transportation network and other public infrastructure/services.

Lead Agency Contact

Name Lori Parks
Agency City of Livermore
Phone 925-960-4450 **Fax**
email
Address 1052 S. Livermore Avenue
City Livermore **State** CA **Zip** 94550

Project Location

County Alameda
City Livermore
Region
Cross Streets Isabel Ave., Airway Blvd., North Caynons Parkway, Portola Ave.,
Lat / Long
Parcel No.

Township	Range	Section	Base

Proximity to:

Highways I-580, SR 84
Airports Livermore Municipal
Railways ACE Corridor
Waterways Arroyo Las Positas, Collier Canyon Creek
Schools Las Positas College
Land Use Commercial, light industrial, institutional, residential, and vacant land (primarily designated for Business Commercial Park)

Project Issues

Reviewing Agencies Resources Agency; Department of Parks and Recreation; Department of Fish and Wildlife, Region 3; Native American Heritage Commission; Department of Housing and Community Development; Caltrans, District 4; Air Resources Board; Regional Water Quality Control Board, Region 2

Date Received 04/15/2016 **Start of Review** 04/15/2016 **End of Review** 05/16/2016

Notice of Completion & Environmental Document Transmittal

2016042039

Mail to: State Clearinghouse, P.O. Box 3044, Sacramento, CA 95812-3044 (916) 445-0613
For Hand Delivery/Street Address: 1400 Tenth Street, Sacramento, CA 95814

SCH #

Project Title: Isabel Neighborhood Plan

Lead Agency: City of Livermore

Contact Person: Lori Parks

Mailing Address: 1052 South Livermore Avenue

Phone: 925-960-4450

City: Livermore

Zip: 94550

County: Alameda

Project Location: County: Alameda

City/Nearest Community: Livermore

Cross Streets: Isabel Avenue, Airway Boulevard, North Canyons Parkway, Portola Avenue

Zip Code: 94551

Longitude/Latitude (degrees, minutes and seconds): ... N / ... W Total Acres: 1135

Assessor's Parcel No.: NA

Section:

Twp.:

Range:

Base:

Within 2 Miles: State Hwy #: I-580, SR 84

Waterways: Arroyo Las Positas, Collier Canyon Creek

Airports: Livermore Municipal

Railways: ACE Corridor

Schools: Las Positas College

Document Type:

CEQA: [X] NOP

[] Draft EIR

NEPA: [] NOI

Other: [] Joint Document

[] Early Cons

[] Supplement/Subsequent EIR

[] EA

[] Final Document

[] Neg Dec

(Prior SCH No.)

[] Draft EIS

[] Other:

[] Mit Neg Dec

Other:

Governor's Office of Planning & Research

Local Action Type:

[] General Plan Update

[X] Specific Plan

[] Rezone

[X] Annexation

[X] General Plan Amendment

[] Master Plan

[] Redevelopment

[] General Plan Element

[] Planned Unit Development

[] Use Permit

[] Coastal Permit

[] Community Plan

[] Site Plan

[] Land Division (Subdivision, etc.)

[] Other:

APR 14 2016

12:30pm

STATE CLEARINGHOUSE

Development Type:

[X] Residential: Units

Acres

[X] Transportation: Type

Local street improvements

[X] Office: Sq.ft.

Acres

Employees

[] Mining: Mineral

[X] Commercial: Sq.ft.

Acres

Employees

[] Power: Type

MW

[] Industrial: Sq.ft.

Acres

Employees

[] Waste Treatment: Type

MGD

[] Educational:

[] Hazardous Waste: Type

[X] Recreational:

[] Water Facilities: Type

MGD

[] Other:

Project Issues Discussed in Document:

[] Aesthetic/Visual

[] Fiscal

[] Recreation/Parks

[] Vegetation

[] Agricultural Land

[] Flood Plain/Flooding

[] Schools/Universities

[] Water Quality

[] Air Quality

[] Forest Land/Fire Hazard

[] Septic Systems

[] Water Supply/Groundwater

[] Archeological/Historical

[] Geologic/Seismic

[] Sewer Capacity

[] Wetland/Riparian

[] Biological Resources

[] Minerals

[] Soil Erosion/Compaction/Grading

[] Growth Inducement

[] Coastal Zone

[] Noise

[] Solid Waste

[] Land Use

[] Drainage/Absorption

[] Population/Housing Balance

[] Toxic/Hazardous

[] Cumulative Effects

[] Economic/Jobs

[] Public Services/Facilities

[] Traffic/Circulation

[] Other:

Present Land Use/Zoning/General Plan Designation:

Commercial, light industrial, institutional, residential, and vacant land (primarily designated for Business Commercial Park)

Project Description: (please use a separate page if necessary)

The City of Livermore is preparing the Isabel Neighborhood Plan (INP) to guide private and public development in the area surrounding the proposed Bay Area Rapid Transit (BART) station in the median of I-580 at Isabel Avenue. The INP will complement BART station planning and would legally function as a Specific Plan. The planning area is within the City's adopted Urban Growth Boundary (UGB). The project proposes annexation of one unincorporated property. The vision for the INP is to create a vibrant, walkable neighborhood with a mix of residential, office, retail, and recreational uses. The preliminary development levels would generate about 4,000 new households and up to 10,000 jobs. The INP will include: new land use regulations, design standards, and improvements to the transportation network and other public infrastructure/services.

Note: The State Clearinghouse will assign identification numbers for all new projects. If a SCH number already exists for a project (e.g. Notice of Preparation or previous draft document) please fill in.

NOP Distribution List.

SCH#

County: Alameda

2016042039

Resources Agency

- Resources Agency ✓
Nadell Gayou
- Dept. of Boating & Waterways
Denise Peterson
- California Coastal Commission
Elizabeth A. Fuchs
- Colorado River Board
Lisa Johansen
- Dept. of Conservation ✓
Elizabeth Carpenter
- California Energy Commission
Eric Knight
- Cal Fire
Dan Foster
- Central Valley Flood Protection Board
James Herota
- Office of Historic Preservation
Ron Parsons
- Dept of Parks & Recreation ✓
Environmental Stewardship Section
- California Department of Resources, Recycling & Recovery
Sue O'Leary
- S.F. Bay Conservation & Dev't. Comm.
Steve McAdam
- Dept. of Water Resources
Nadell Gayou
- Fish and Game
- Dept. of Fish & Wildlife
Scott Flint
Environmental Services Division
- Fish & Wildlife Region 1
Curt Babcock

- Fish & Wildlife Region 1E
Laurie Harnsberger
- Fish & Wildlife Region 2
Jeff Drongenes
- Fish & Wildlife Region 3 ✓
Craig Weightman
- Fish & Wildlife Region 4
Julie Vance
- Fish & Wildlife Region 5
Leslie Newton-Reed
Habitat Conservation Program
- Fish & Wildlife Region 6
Tiffany Ellis
Habitat Conservation Program
- Fish & Wildlife Region 6 I/M
Heidi Calvert
Inyo/Mono, Habitat Conservation Program
- Dept. of Fish & Wildlife M
Becky Ota
Marine Region

- OES (Office of Emergency Services)
Monique Wilber
- Native American Heritage Comm.
Debbie Treadway
- Public Utilities Commission
Supervisor
- Santa Monica Bay Restoration
Guangyu Wang
- State Lands Commission
Jennifer Daleong
- Tahoe Regional Planning Agency (TRPA)
Cherry Jacques
- Cal State Transportation Agency CalSTA
- Caltrans - Division of Aeronautics
Philip Critmins
- Caltrans - Planning
HQ LD-IGR
Terri Pencovic
- California Highway Patrol
Suzann Ikeuchi
Office of Special Projects
- Dept. of Transportation
- Caltrans, District 1
Rex Jackman
- Caltrans, District 2
Marcelino Gonzalez
- Caltrans, District 3
Eric Federicks - South
Susan Zanchi - North
- Caltrans, District 4 ✓
Patricia Maurice
- Caltrans, District 5
Larry Newland
- Caltrans, District 6
Michael Navarro
- Caltrans, District 7
Dianna Watson

- Caltrans, District 8
Mark Roberts
- Caltrans, District 9
Gayle Rosander
- Caltrans, District 10
Tom Dumas
- Caltrans, District 11
Jacob Armstrong
- Caltrans, District 12
Maureen El Harake
- Cal EPA
- Air Resources Board
- All Other Projects ✓
Cathi Slaminski
- Transportation Projects
Nesamant Kalandiyur
- Industrial/Energy Projects
Mike Tollstrup
- State Water Resources Control Board
Regional Programs Unit
Division of Financial Assistance
- State Water Resources Control Board
Cindy Forbes - Asst Deputy
Division of Drinking Water
- State Water Resources Control Board
Student Intern, 401 Water Quality Certification Unit
Division of Water Quality
- State Water Resources Control Board ✓
Phil Crader
Division of Water Rights
- Dept. of Toxic Substances Control
CEQA Tracking Center
- Department of Pesticide Regulation
CEQA Coordinator

Other Departments

- Food & Agriculture
Sandra Schubert
Dept. of Food and Agriculture
- Depart. of General Services
Public School Construction
- Dept. of General Services
Cathy Buck/George Carollo
Environmental Services Section
- Delta Stewardship Council
Kevan Samsam
- Housing & Comm. Dev. ✓
CEQA Coordinator
Housing Policy Division
- Independent Commissions, Boards
- Delta Protection Commission
Michael Machado

- Caltrans, District 8
Victorville Branch Office
- RWQCB 7
Colorado River Basin Region (7)
- RWQCB 8
Santa Ana Region (8)
- RWQCB 9
San Diego Region (9)
- Other

- RWQCB 1
Cathleen Hudson
North Coast Region (1)
- RWQCB 2 ✓
Environmental Document Coordinator
San Francisco Bay Region (2)
- RWQCB 3
Central Coast Region (3)
- RWQCB 4
Teresa Rodgers
Los Angeles Region (4)
- RWQCB 5S
Central Valley Region (5)
- RWQCB 5F
Central Valley Region (5)
Fresno Branch Office
- RWQCB 5R
Central Valley Region (5)
Redding Branch Office
- RWQCB 6
Lahontan Region (6)
- RWQCB 6V
Lahontan Region (6)
Victorville Branch Office
- RWQCB 7
Colorado River Basin Region (7)
- RWQCB 8
Santa Ana Region (8)
- RWQCB 9
San Diego Region (9)
- Other

U.S. Department of Homeland Security
FEMA Region IX
1111 Broadway, Suite 1200
Oakland, CA. 94607-4052



FEMA

April 25, 2016

Lori Parks, Associate Planner
City of Livermore, Planning Division
1052 South Livermore Avenue
Livermore, California 94550

Dear Ms. Parks:

This is in response to your request for comments regarding the Notice of Preparation of a Program Environmental Impact Report, Isabel Neighborhood Plan in the City of Livermore.

Please review the current effective countywide Flood Insurance Rate Maps (FIRMs) for the County of Alameda (Community Number 060001) and City of Livermore (Community Number 060008), Maps revised August 3, 2009. Please note that the City of Livermore, Alameda County, California is a participant in the National Flood Insurance Program (NFIP). The minimum, basic NFIP floodplain management building requirements are described in Vol. 44 Code of Federal Regulations (44 CFR), Sections 59 through 65.

A summary of these NFIP floodplain management building requirements are as follows:

- All buildings constructed within a riverine floodplain, (i.e., Flood Zones A, AO, AH, AE, and A1 through A30 as delineated on the FIRM), must be elevated so that the lowest floor is at or above the Base Flood Elevation level in accordance with the effective Flood Insurance Rate Map.
- If the area of construction is located within a Regulatory Floodway as delineated on the FIRM, any *development* must not increase base flood elevation levels. **The term *development* means any man-made change to improved or unimproved real estate, including but not limited to buildings, other structures, mining, dredging, filling, grading, paving, excavation or drilling operations, and storage of equipment or materials.** A hydrologic and hydraulic analysis must be performed *prior* to the start of development, and must demonstrate that the development would not cause any rise in base flood levels. No rise is permitted within regulatory floodways.

Lori Parks, Associate Planner
Page 2
April 25, 2016

- All buildings constructed within a coastal high hazard area, (any of the "V" Flood Zones as delineated on the FIRM), must be elevated on pilings and columns, so that the lowest horizontal structural member, (excluding the pilings and columns), is elevated to or above the base flood elevation level. In addition, the posts and pilings foundation and the structure attached thereto, is anchored to resist flotation, collapse and lateral movement due to the effects of wind and water loads acting simultaneously on all building components.
- Upon completion of any development that changes existing Special Flood Hazard Areas, the NFIP directs all participating communities to submit the appropriate hydrologic and hydraulic data to FEMA for a FIRM revision. In accordance with 44 CFR, Section 65.3, as soon as practicable, but not later than six months after such data becomes available, a community shall notify FEMA of the changes by submitting technical data for a flood map revision. To obtain copies of FEMA's Flood Map Revision Application Packages, please refer to the FEMA website at <http://www.fema.gov/business/nfip/forms.shtm>.

Please Note:

Many NFIP participating communities have adopted floodplain management building requirements which are more restrictive than the minimum federal standards described in 44 CFR. Please contact the local community's floodplain manager for more information on local floodplain management building requirements. The Livermore floodplain manager can be reached by calling Pamela Lung, Associate Civil Engineer, at (925) 960-4538. The Alameda County floodplain manager can be reached by calling Hank Ackerman, Principal Civil Engineer, at (510) 670-5553.

If you have any questions or concerns, please do not hesitate to call Sarah Owen of the Mitigation staff at (510) 627-7050.

Sincerely,



Gregor Blackburn, CFM, Branch Chief
Floodplain Management and Insurance Branch

cc:

Pamela Lung, Associate Civil Engineer, City of Livermore
Hank Ackerman, Principal Civil Engineer, Alameda County Public Works Agency, Alameda County
Ray Lee, WREA, State of California, Department of Water Resources, North Central Region Office
Sarah Owen, NFIP Planner, DHS/FEMA Region IX
Alessandro Amaglio, Environmental Officer, DHS/FEMA Region IX

DEPARTMENT OF TRANSPORTATION

DISTRICT 4
P.O. BOX 23660
OAKLAND, CA 94623-0660
PHONE (510) 286-5530
FAX (510) 286-5559
TTY 711
www.dot.ca.gov



*Serious Drought.
Help save water!*

April 28, 2016

ALAVAR042
ALA-VAR-PM VAR
SCH# 2016042039

Ms. Lori Parks
City of Livermore
1052 S Livermore Avenue
Livermore, CA 94550

Dear Ms. Parks:

Isabel Neighborhood Plan – Notice of Preparation

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Isabel Neighborhood Plan. The new Caltrans mission, vision, and goals signal a modernization of our approach to California's transportation system, in which we seek to reduce statewide vehicle miles traveled (VMT) and increase non-auto modes of active transportation. Caltrans plans to increase non-auto mode shares by 2020 through tripling bicycle, and doubling pedestrian and transit. These targets also support the Metropolitan Transportation Commission's (MTC) Sustainable Communities Strategy (SCS), which promotes the increase of non-auto mode shares by ten percentage points and a decrease in automobile VMT per capita by ten percent. The following comments are based on the Notice of Preparation.

Project Understanding

Bay Area Rapid Transit (BART) is proposing to extend its transit system line 4.8 miles from the existing Dublin/Pleasanton Station to the City of Livermore. Of the five alternatives that BART is evaluating for this project, two alternatives propose a new station located within the median of I-580 near the Isabel Avenue (SR 84) interchange.

The proposed Isabel Neighborhood Plan (INP) will legally function as a Specific Plan for the area around the proposed BART station at the I-580/SR 84 interchange. The vision for the INP is to create a vibrant, walkable neighborhood with a mix of residential, office, retail, and recreational uses. The preliminary development levels would generate about 4,000 new households and up to 10,000 jobs. The INP will include: new land use regulation, design standards, and improvements to the transportation network and other public infrastructure/services.

BART will lead a separate but related environmental review process, expecting to release the draft EIR for the *BART to Livermore Extension Project* in early 2017. We understand that the City of Livermore is preparing the INP draft EIR in advance of BART's draft EIR, but that both agencies are working closely with each other. Please coordinate with BART as necessary to provide the requested information for the INP draft EIR.

Lead Agency

As the lead agency, the City of Livermore is responsible for all project mitigation, including any needed improvements to State highways. The project's fair share contribution, financing, scheduling, implementation responsibilities, and lead agency monitoring should be fully discussed for all proposed mitigation measures.

This information should also be presented in the Mitigation Monitoring and Reporting Plan of the environmental document, a draft of which should be included in the draft Environmental Impact Report for our review. Required roadway improvements should be in place prior to completion of the project.

Transportation Impact Fees

Please identify the project-generated traffic and estimate the costs of public transportation improvements necessitated by the INP. The INP should estimate the costs of the needed improvements and identify viable funding sources such as development impact fees or transportation impact fees. We encourage a sufficient allocation of fair share contributions toward multi-modal improvements and regional transit projects in order to better mitigate and plan for the impact of future cumulative growth on the regional transportation system. We support projects and measures to reduce VMT and increase sustainable mode shares.

Traffic Impact Study

Please ensure that the environmental document includes an analysis of the travel demand expected from the proposed project and its impact on I-580 and SR 84. We recommend using the *Caltrans Guide for the Preparation of Traffic Impact Studies* (TIS Guide) for determining which scenarios and methodologies to use in the analysis, available at the following website:

http://dot.ca.gov/hq/tpp/offices/ocp/igr_ceqa_files/tisguide.pdf

Please ensure that a TIS is prepared providing the information detailed below:

- A vicinity map, regional location map, and site plan clearly showing project access in relation to nearby State roadways. Ingress and egress for all project components should be clearly identified. The State right-of-way (ROW) should be clearly identified. The maps should also include project driveways, local roads and intersections, car/bike parking, and transit facilities.
- Project-related trip generation, travel demand, distribution, and assignment including per capita use of transit, rideshare or active transportation modes such as existing bus service, new bus service, and VMT reduction factors. The assumptions and methodologies used to develop this information should be detailed in the study, utilize the latest place-based research, and be supported with appropriate documentation.
- 2035 Cumulative Conditions and 2035 Cumulative Plus Project Conditions. Caltrans anticipates this large-sized project will generate high levels of AM and PM peak hour traffic which will impact I-580 and SR 84 in both the short- and long-term horizons; therefore, Caltrans recommends the TIS include turning movement traffic per study

intersection under Existing, Project Only, Existing + Project, Background, 2035 Cumulative, 2035 Cumulative + Project Conditions.

- A schematic illustration of walking, biking, and auto conditions at the project site and study area roadways, trip distribution percentages and volumes, and intersection geometrics (i.e., lane configurations for AM and PM peak hour periods). Potential safety issues for all road users should be identified and fully mitigated.
- The planning area's building potential as identified in local and regional plans. The environmental document should evaluate the project's consistency with the Circulation Element of the City's General Plan, the Congestion Management Agency's Congestion Management Plan, as well as with MTC's SCS. In evaluating consistency with the SCS, specify if the project is in a Priority Development Area.
- Mitigation for any roadway sections or intersections with increasing VMT should be identified. Mitigation may include contributions to the regional fee program as applicable, and should support the use of transit and active transportation modes. Potential mitigation measures that include the requirements of other agencies such as Caltrans are fully enforceable through permit conditions, agreements, or other legally-binding instruments under the control of the City.
- The project's primary and secondary effects on pedestrians, bicycles, disabled travelers, and transit performance should be evaluated; this includes countermeasures and trade-offs resulting from mitigating VMT increases. Access to pedestrian, bicycle, and transit facilities must be maintained.

At this time, it is not known how the proposed BART station will be accessed. The TIS for the INP should consider all the station alternatives that BART is evaluating for the *BART to Livermore Extension Project*, how each proposed alternative will be accessed, and how each proposed alternative would impact the State's transportation network.

Vehicle Trip Reduction

Given the size of the project and its potential to generate trips to and from the project area, the project should include a robust Transportation Demand Management (TDM) Program to reduce auto trips, VMT, and greenhouse gas emissions. Such measures will be critical in order to facilitate efficient transportation access to and from the site and reduce transportation impacts associated with the project. The following are example TDM strategies for the City's consideration:

- Project design to encourage walking, bicycling, and convenient transit access;
- Parking cash out/parking pricing;
- Formation of a Transportation Management Association (TMA) in partnership with other developments in the area;
- Adoption of an aggressive trip reduction target with a Lead Agency monitoring and enforcement program;

- Transit fare incentives such as such as free or discounted transit passes on a continuing basis;
- Public-private partnerships or employer contributions to provide improved transit or shuttle service in the project area.

Implementing these TDM measures will help the project become more consistent with the MTC Sustainable Community Strategy and the Caltrans Strategic Management Plan goals. Please refer to Chapter 8 the FHWA *Integrating Demand Management into the Transportation Planning Process: A Desk Reference*, regarding TDM at the local planning level. The reference is available online at:

<http://www.ops.fhwa.dot.gov/publications/fhwahop12035/fhwahop12035.pdf>

Please also refer to *Reforming Parking Policies to Support Smart Growth*—a Caltrans-funded MTC study—for sample parking ratios and strategies that support compact growth. Reducing parking supply can encourage alternate forms of transportation, reduce regional vehicle miles traveled, and lessen future impacts. This handbook is available online at:

<http://mtc.ca.gov/sites/default/files/Toolbox-Handbook.pdf>

Transportation Management Plan

A Transportation Management Plan (TMP) or construction TIS may be required of the developer for approval by Caltrans prior to construction where traffic restrictions and detours affect State highways. TMPs must be prepared in accordance with California *Manual on Uniform Traffic Control Devices*. For further TMP assistance, please contact the Office of Traffic Management Plans/Operations Strategies at 510-286-4579 and see the following website:

<http://www.dot.ca.gov/hq/traffops/engineering/mutcd/pdf/camutcd2014/Part6.pdf>

Encroachment Permit

Please be advised that any work or traffic control that encroaches onto the State ROW requires an encroachment permit that is issued by Caltrans. Traffic-related mitigation measures should be incorporated into the construction plans prior to the encroachment permit process. To apply, a completed encroachment permit application, environmental documentation, and five (5) sets of plans clearly indicating State ROW must be submitted to the following address:

David Salladay, District Office Chief
Office of Permits, MS 5E
California Department of Transportation, District 4
P.O. Box 23660
Oakland, CA 94623-0660

See the following website for more information:

<http://www.dot.ca.gov/hq/traffops/developserv/permits>

Ms. Lori Parks, City of Livermore
April 28, 2016
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In addition to sending the draft EIR to the State Clearinghouse, CEQA Guideline Article 13, section 15206(a)(1) requires that the lead agency also submit to the appropriate metropolitan area council of governments for review and comment. Should you have any questions regarding this letter, please contact Jesse Schofield at 510-286-5562 or jesse.schofield@dot.ca.gov.

Sincerely,

A handwritten signature in blue ink that reads "Patricia".

PATRICIA MAURICE
District Branch Chief
Local Development - Intergovernmental Review

c: State Clearinghouse

From: [Crimmins, Philip P@DOT](mailto:Crimmins.Philip.P@DOT)
To: Parks, Lori
Cc: [Crimmins, Philip P@DOT](mailto:Crimmins.Philip.P@DOT)
Subject: CEQA docs. for Caltrans Aeronautics
Date: Thursday, May 19, 2016 3:59:55 PM

Hi Lori,

I received your letter and NOP regarding the Isabel Neighborhood Plan in Livermore. Thanks so much for the notice. I also left you a voice mail at your office today.

We did not receive the NOP from the State Clearinghouse as you mentioned in your letter.

I look forward to reviewing the Draft EIR for Isabel when it goes out for comment so please send it directly to me.

Since I am the single point of contact for the Division for CEQA review please send future documentation to me instead of Bob Fiore.

Thanks again for your assistance!

Sincerely,

Philip

PHILIP CRIMMINS

CEQA + Noise

Caltrans

Division of Aeronautics MS-40

P.O. Box 942874

Sacramento, CA 94274-0001

P. (916) 654-6223

F. (916) 653-9531



2950 PERALTA OAKS COURT P.O. BOX 5381 OAKLAND CALIFORNIA 94605-0381 T: 1-888-EBPARKS F: 510-569-4319 TRS RELAY: 711 WWW.EBPARKS.ORG

May 24, 2016

Lori Parks, Associate Planner
City of Livermore, Planning Division
1052 South Livermore Avenue
Livermore, CA 94550

RE: Isabel Neighborhood Plan Program EIR NOP

Dear Ms. Parks,

Thank you for the opportunity to comment on the Isabel Neighborhood Plan Program Environmental Impact Report Notice of Preparation. The East Bay Regional Park District stewards over 120,000 acres of parklands in both Contra Costa and Alameda Counties. As a special district that owns and manages paved trails with regional transportation connections, our Master Plan policies specifically guide the District in the development of these trails.

The District is particularly interested in connecting the proposed station to regional trails in the area, although commenting on the appropriateness of the BART to Livermore project is beyond the scope of the District's interest. Regardless, these comments would apply to other alternatives such as Bus Rapid Transit. The District also shares goals of the proposed project, such as protecting open space, with the City and BART. That being said, we are keenly interested in the potential impacts to Recreation resources.

We suggest that the proposed station connect with the District's Master Plan trails in the area, particularly the one that travels along Isabel Avenue at the intersection of Interstate-580 in order to provide riders bicycle/pedestrian access to and from the station and the critical first- and last-mile connections. Here are some other specific trail connections that the District is interested in having included in the Isabel Neighborhood Plan:

- Our Master Plan identifies the Shadow Cliffs to Morgan Territory Trail running along the northern portion of Isabel Avenue and west of Las Positas College as an important one for creating regional connection.
- The proposed BART station is located on Isabel Avenue, making a trail connection along Isabel Avenue very important for connections north to the college and south to development and the future Iron Horse Trail (which is outside of the Plan Area).
- A portion of the trail connection to Doolan Canyon runs along the western boundary of the plan area, and an east-west connector from Doolan Canyon Road to Shadow Cliffs and Morgan Territory Trail would be an important Recreation resource.

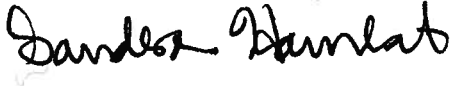
Board of Directors

Doug Siden President Ward 4	Beverly Lane Vice-President Ward 6	Dennis Waespi Treasurer Ward 3	Diane Burgis Secretary Ward 7	Whitney Dotson Ward 1	John Sutter Ward 2	Ayn Wieskamp Ward 5	Robert E. Doyle General Manager
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- There are potential east-west and north-south trail connections paralleling Airway Boulevard (to Isabel Avenue) to connect Doolan Canyon to Shadow Cliffs and Morgan Territory Trail, the Iron Horse Trail, and the greater downtown area of Livermore.

Please feel free to contact us if you have any questions or would like additional information.

Sincerely,

A handwritten signature in black ink that reads "Sandra Hamlat". The signature is written in a cursive, flowing style.

Sandra Hamlat
Senior Planner



May 26, 2016

City of Livermore
Mayor, City Council, Planning Commission Members, and City Staff
1052 S. Livermore Avenue
Livermore, CA 94550

RE: Isabel Neighborhood Plan—Scope of the EIR

Dear City of Livermore Mayor Et. al,

Thank you for providing Chamberlin Associates (Chamberlin) with the opportunity to comment on the scope of the EIR for the Isabel Neighborhood Plan. Chamberlin owns an approximately 11 acre vacant, infill site at the northwest intersection of Airway Blvd. and I-580 within the Isabel Neighborhood Plan Area. Below are our comments on the scope of the EIR for the Isabel Neighborhood Plan.

On March 24, 2016, Chamberlin submitted an application to the City of Livermore for modifications to its standards and regulations for its site at the northwest intersection of Airway Blvd. and I-580 within the Isabel Neighborhood Plan Area. We request that our proposed modifications be studied in the Isabel Neighborhood Plan EIR for consistency and because it is reasonable to assume our proposed modifications may be approved. Our 11.29 acre project site is adjacent to the I-580 freeway and Airway Boulevard, yet challenging to develop due to its existing L-shaped zoning (PD-I-181 and CHS), topography, and I-580 Scenic Corridor restrictions. Additional flexibility, consistent with the spirit of the site's existing regulations, was requested in our application and project narrative.

Corrections to the biological section of the Isabel Neighborhood Plan Existing Conditions report were needed and Chamberlin requests these be corrected in the EIR. The Existing Conditions report shows our site as grassland and CTS habitat. This is incorrect based on other published reports and information.

The East Alameda Conservation Strategy classifies our site as “developed ruderal” (Figure 2-8) meaning it is developed from a biological standpoint and has plants that colonize disturbed land. “Grassland” in East Alameda Conservation Strategy is also shown in Figure 3-2 and it doesn't include our site. Similarly, the Livermore General Plan Open Space and Conservation Element (Figure 8-1) classifies the site as “Developed,” instead of grassland.

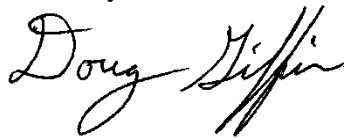
Page 6-3 of the Isabel Neighborhood Plan Existing Conditions report states that developed areas and roadways do not contain sensitive species. This seems correct and, if so, we request the maps and text in the Existing Conditions and EIR report be updated to convey this. The maps show our site and the Casino 580 site to the west as CTS

habitat even though this area to the west is developed. Our site is an infill site, highly disturbed by repetitive disking, and includes a drainage system designed to remove all water so that there is no pooled water on site.

We also request that the economic feasibility of the existing site regulations and the existing plus proposed site regulations be studied for our site. The regulations on our site need to be economically feasible. As noted above, our site has been challenging to develop.

We look forward to working with the City of Livermore on its Isabel Neighborhood Plan. If there is any additional information we can provide to assist you, please do not hesitate to contact me. Thank you again for the opportunity to comment.

Sincerely,

A handwritten signature in black ink that reads "Doug Giffin". The signature is written in a cursive, flowing style.

Doug Giffin
Vice President
Chamberlin Associates
doug@chamb.com

CC: City of Livermore Planning Division, Lori Parks, 1052 South Livermore Avenue, Livermore, CA 94550.



ALAMEDA COUNTY FLOOD CONTROL AND WATER CONSERVATION DISTRICT, ZONE 7

100 NORTH CANYONS PARKWAY • LIVERMORE, CA 94551 • PHONE (925) 454-5000 • FAX (925) 454-5727

May 27, 2016

Lori Parks, Associate Planner
City of Livermore, Planning Division
1052 South Livermore Avenue
Livermore, CA 94550

Re: *Comments on Isabel Neighborhood Plan Notice of Preparation*

Lori,

Zone 7 Water Agency (Zone 7) has reviewed the referenced Notice of Preparation (NOP) in the context of Zone 7's mission to provide water supply, flood protection, and groundwater and stream management within the Livermore-Amador Valley. We have some comments for your consideration:

1. **Groundwater Quality.** Much of the Plan area lies over a groundwater basin that is used for municipal, domestic and irrigation supply. To support protection of groundwater quality, the project should observe the basin's Salt and Nutrient Management Plan, the State's Water Recycling Policy (and associated orders), the State's storm water protection measures, and the County's Water Wells Ordinance.
2. **Site Drainage.** The Plan area drains within Zone 7's service area. The EIR should include hydrologic and hydraulic analysis of the potential geomorphic and flood impacts as a result of the project, as applicable, with mitigation measures identified where appropriate.
3. **Recycled Water for Irrigation.** Expanding the use of recycled water in the Livermore-Amador Valley is a critical part of a diversified water supply portfolio that assures reliable supplies even during drought periods and, as such, is fully supported by Zone 7. Use of recycled water not only relieves stress on the potable water supplies of the community but also enhances quality of life for residents by providing an uninterrupted irrigation supply to parks and greenbelts.
4. **Water Supply & Demand.** The analysis should address the water requirements of the Plan.
5. **Zone 7 Pipeline Infrastructure.** Zone 7 has two pipelines/easements within the Plan area. The Altamont Pipeline runs easterly along E. Airway Blvd., from Isabel Ave. to beyond Portola Ave. The Cross-Valley Pipeline runs easterly along Kittyhawk Rd. to a pump station located at the corner of E. Airway & Isabel Ave., then southerly along Isabel Ave. Any work with Zone 7's easements will require an encroachment permit; Contact John Koltz, 925-454-5067.

We appreciate the opportunity to comment on this project. If you have any questions on this letter, please feel free to contact me at (925) 454-5005 or via email at erank@zone7water.com.

Sincerely,

Elke Rank

cc: Carol Mahoney, Amparo Flores, Matt Katen, file

From: [Stein, John](#)
To: [BART 2 Isabel](#)
Cc: [Cityclerk - Livermore](#)
Subject: DEIR scoping comments on the residential development around the BART Isabel Station
Date: Tuesday, May 31, 2016 10:50:19 AM

May 30, 2016

John Stein
1334 Kathy Court
Livermore, California 94550

Lori Parks
Associate Planner
City of Livermore
1052 South Livermore Avenue
Livermore, California 94550

Dear Lori,

I enjoyed the presentations at the scoping meeting and description of the EIR process. I was somewhat disappointed in the meager attendance at the scoping meeting for the proposed development of the area around the proposed BART Isabel station. While I did offer some brief comments during the meeting the City web site says that comments must be submitted in writing. I have attached my comments regarding the scope of the Draft Environmental Impact Report (DEIR) as well as some potential clarifications regarding the Existing Conditions Report.

I apologize for the fact that the comments were not shorter and better organized but because of personal issues my time was limited. I have also included some planning issues since any proposed mitigations will need to be reasonable and have a specific funding source identified. Because of rapidly increasing pension obligations and deferred maintenance cost the use of the City's General Fund contributions for capital cost and ongoing operation and maintenance of special facilities cannot be counted upon.

In general my comments deal with emphasis in the preferred alternative that 4000+ residential units are needed to obtain priority in achieving funding for the construction of the BART extension. This led to the exclusion of most of the environmental and other goals (i.e. ridership, traffic congestion relief, reduction in greenhouse gases, protection of visual resources and airport operations). I was disappointed that the preferred alternative virtually ignored the facts that the site is bisected by a ten lane freeway, and is located in the Airport Protection Area and the Scenic Corridor. There was also an emphasis on alternative transportation, walking, biking, and public transit when over 80 percent of the proposed new

residents will use private automobiles to commute to work and do their daily errands. In the same way over 80 percent of the station ridership will be generated by commuter parking not the not local residents. Traffic and parking for residents and commuters appears to have been deemphasized.

I would have liked to see a broader range of alternative plans. The preferred alternative appears to be the Bay Area Plan's procrustean plan designed to provide workforce housing for the San Jose and San Francisco better suited to the urban Central Bay with a robust existing public transit system and a wide range of nearby public and private services and infrastructure already in existence. It appears to be a preconceived creation of the consultant and not the community. A majority of the groups involved in the development of the preferred plan were not composed of local residents or were presented with only variations of a single high density residential development. The plan is ill matched to an end-of-the-line station located at the very edge of a smaller suburban city. Two possible better alternatives would be: (1) a plan focused on providing adequate and convenient commuter parking and counter commute industrial parks and offices facilities. This would better address ridership. reduction of traffic congestion and GHG. (2) deannexing the area to the County of Alameda to spread out the infrastructure and maintenance costs over a larger population base.

Finally there appears to be a logical inconsistency in that the 4000+ residential units proposed are based upon the Plan Bay Area plan but the proposed preferred alternative ignores the local agency's General Plan mitigations used to reduce impacts to less than significant in the Plan Bay Area EIR. This particularly relates to airport noise and protection of visual resources.

Thank you for the opportunity to comment.

John Stein (925) 449-7896

Attachment:

Comments on the Draft EIR for the Isabel "Neighborhood" Plan

Introduction

I am concerned that there are an insufficient set of alternatives. It appears that funding of the BART extension dependence solely on a minimum number of nearby housing units has distorted the EIR process. What guarantees are there that funding will exist? Won't increased traffic congestion on I-580, which is projected to surpass that on I-80, and the loss of ability to effectively transport workers and goods into the bay area have a greater impact? Many of the goals of the One Bay area plan such as reduction in traffic congestion, transit ridership, reduction of GHG and the resident's health and welfare have been ignored or deemphasized. Why? The financial analysis focuses on using parking fees and land use fees only to fund the extension. Also there is little discussion as to the

financial impacts on the City of Livermore and the ability to fund infrastructure and provide ongoing services. Why?

The plan seems to be a one size fits all plan that sets the need to accommodate 4000+ housing units as the primary goal. At the same time it seems to consider the existence of a 10 lane heavily congested freeway running through the plan area of minor importance. Why does it not consider the physical, psychological or economic barrier it represents. It ignores the impacts of the fourth busiest airport in the bay area. And finally it discounts the importance of the Scenic Corridor to the citizens of Livermore and the Character of the City. What unique elements of the plan accommodate and address these existing conditions?

There is also a question as to ultimate costs of funding of the major driver of this proposal, the BART extension. The cost in current dollars, carrying cost of bonding, as well as timing and funding sources have yet to be defined. There are the rapidly emerging problems of BART's maintenance, safety, upgrades and capacity and their cost effect on this project to be addressed. How will the rapidly expanding list of BART projects and associated delays affect funding and timing of this proposal and the increasing environmental impacts of increased traffic congestion and airport operations? Sustainable and balanced Community

There is a great deal of emphasis on the idea of a balanced and sustainable neighborhood as well as linkage to the existing City of Livermore. Yet it appears that many of the elements that are generally thought of as elements of a neighborhood are lacking. There does not appear to be land reserved for a local public elementary school, normal size neighborhood parks, and a fire station capable of meeting local needs or a full size shopping center. It is also unclear if there will be locations available for houses of worship, a neighborhood community center and pool as well as a social service center to provide senior services legal and mental health services. Could you describe where and how these vital functions will be provided nearby?

There is also the question of how this large housing assemblage will be linked to the greater Livermore community. The proposed project is located on the northwest edge of the city surrounded by light industrial, a college campus and a limited amount of residential development. It is isolated from the rest of the City by a ten lane freeway. With a large transient rental component and few incorporated municipal facilities and services what will provide the bidirectional linkage described. What is to prevent a condition similar to North Livermore (Springtown) where there is a general lack of community participation and feeling of isolation and being treated as Livermore's "red headed stepchildren"?

In suburbia a vibrant community is one with a wide range of housing types, incomes and ages. It has quiet safe streets smooth flowing traffic and ample parking. There is a local library elementary school and parks and recreation. There is an active PTA, neighborhood watch, farmers market and block parties. Why specifically is this project characterized as a vibrant neighborhood?

One of Livermore's policies is that growth pay its own way. Will this project be able to fully fund the entire infrastructure improvements needed without impacting services, fees or taxes on existing residents? Will this project generate sufficient funds to pay for ongoing operation and maintenance? What will happen if the commercial and office portion is not constructed in a timely manner?

I have enclosed a list of a few of my concerns, in no particular order to be addressed in the scoping process of the proposed Draft EIR.

Ridership

What is the projected ridership required to justify the BART extension? Based upon the limited parking and existing percentage of BART usage by suburban residents what is the number of riders projected at buildout of the residential portion of the project. What percentage of the new residents will use BART to commute to work? If the office portion of the project is built based upon existing BART usage in suburban areas how many counter commute riders would be generated? There a number of existing user, that may be displaced, in the area whose employees might use BART. What are these users and how many riders might they generate? How many existing businesses would have to be displaced to fully implement the plan? How much do these businesses generate in tax dollars?

Parking and Traffic

Parking is of major importance since it will affect traffic congestions and the generation of greenhouse gasses (GHG). One of the requirements for an end-of-the-line suburban BART station is adequate convenient parking. In this case parking is important because it directly impacts ridership and traffic congestion on I-580. It also can directly impact neighboring uses. As Livermore's City engineer has stated a "plethora of parking" is vital to prevent spillover parking from causing increased traffic congestion and parking enforcement problems. In the current plan the parking structure is located south of the I-580 freeway. Why, other than the fact that this is the only location that cannot be used for residential, was this location chosen? How will the fact that reaching this location requires crossing I-580 and SR-84 twice as well as three or perhaps four signalized intersections affect accessibility? Could this limited accessibility cause traffic to back up onto I-580. How will this affect pedestrian safety particularly that of children walking to school? Could this location require costly traffic improvements such as dedicated flyover or conversion of the Isabel interchange to a full clover leaf? Since there is already a BART owned 50 acre parcel located adjacent to the station on the north side of I-580 with direct freeway access why wasn't this location chosen? How convenient is a multistory parking structure? How long does it take to get to the top level during peak usage periods? What special design features will need to be provided to insure that the structure can be rapid filled to avoid traffic backups? How does the cost of a space in a parking structure compare to surface parking based upon current land prices? A northern site for commuter parking would free the southern site for parking for Livermore residents? Why was structured parking chosen over surface parking? Based upon current BART usage at similar stations how many riders does residential and commercial development similar to that proposed generate per acre? How does that compare to ridership generation per acre of surface parking or in two or three level story parking structures that meet Scenic Corridor policies?

A majority of the ridership at the two existing Valley stations arrives by private automobile. What is this percentage? Ridership appears to be determined by the amount of available parking. I-580 now carries over 100,000 cars per day headed to the west. How was parking demand determined? How will this estimate increase with time and increased congestion of I-580, I-680 and other major traffic corridors? How will the new extension to San Jose affect

demand for parking at the new and existing BART stations? What effect will increasing tolls on the HOV have on parking demand? How will improved train control systems and the new San Jose extension affect BART ridership capacity at the Isabel Station? What provisions are there in terms of land set aside for expansion of BART directly adjacent or near the station parking if demand exceeds expectations?

Adequate parking for the proposed residential and commercial is important to retail success, traffic circulation and to avoid spillover parking. Also, inadequate parking can result in considerable additional miles spent looking for parking increasing traffic congestion noise air pollution and increased GHG's. What is the existing number of vehicles registered per household in Livermore? Based upon this number which is likely between 1.5 and 2 vehicles per unit this means that there will be a requirement for six to eight thousand spaces for the residential units. Where and how will this parking be provided? In the same way what will be the demand for parking for the proposed office and commercial development? How and where will this parking be provided? The existing higher density apartments and Condos in Livermore have depended upon on street parking in surrounding single family neighborhoods to make up for parking shortfalls. Will this be possible for this proposal? Also these projects are home to a number of tradesmen, on call workers and small business owners. They bring home a number of commercial vehicles like pickups, tall panel trucks, trailers as well as tow trucks, small dump trucks and even some larger vehicles. How and where will parking for these vehicles be provided?

It should be noted that there is only a limited bus system in the Valley. In fact because of budget limitations the number of bus miles has decreased over the past decade. Funding limits headway, hours and days of operation and number of routes. If services are increased to this area it will reduce service in other areas. If buses are to be considered as a means of reducing automobile dependence a new reliable funding source for capital and operations funding will have to be found. At present federal state and local funding is limited and focused on keeping the expensive urban systems like Muni and AC transit and even BART afloat. Funding requests must also compete with high speed rail, ferries and BART infrastructure replacement and upgrades. Have specific sources of funding for public transit for this project been identified? Should this project be required to fund an on call van service? How might such a system be administered and funded? Another possible outcome is the increased use of private transportation like taxis, ride services and Uber and Lyft. How could this affect the need for parking as well as potentially increased miles traveled together with increased air pollution and GHGs?

Livermore has a long maintained a policy of free and convenient parking both in residential and commercial areas. It has avoided the use of parking meters, paid parking lots or residential parking permits. It is a major incentive to attracting new businesses and providing safe and accessible neighborhoods. Spillover parking from the BART station may become a problem to nearby areas. What methods of control are available that respect this policy. What other sort of enforcement can be used and how can it be funded? How does the type of development immediately surrounding the station affect this problem? The East Dublin

station with office and high rise residential units with gated parking seem to fewer problems than the West Dublin station with commercial and conventional residential with on street and uncontrolled parking. The same sort of problems seem to occur at the Bayfair station. Have they successfully addressed this problem around the BART Bayfair station?

The proposed 4000+ housing units around the Isabel station represent an over 10% increase in units for the entire City of Livermore. Since the housing around the Isabel station will have limited municipal and commercial services how will this affect parking availability within the existing community? Will parking at sites like shopping centers, libraries, schools, churches, community centers, pools and restaurants be impacted? How can this be mitigated? Would a small civic center and a more adequate commercial center be appropriate?

This project will have major traffic impacts. While a small percentage of workers will use BART or other public transit to commute to work the bulk will use their automobile. Because of the isolated location and lack of a fully integrated and balanced neighborhood they will need to travel to go to work, get to school, go shopping, go to church, see their doctor, dentist vet or enjoy recreational and cultural opportunities. With limited public transit, a climate that is often too hot to bike or walk to destinations that require trips of miles the automobile will be the major means of transportation (note the distances given in the Existing Conditions Report seem to be as the crow flies not actual travel distance). Should actual travel distance which are often twice as long be reported? For distance to elementary and middle schools should the safest route taking into account separation from traffic, sidewalk condition, and minimizing crossing of major streets distance be reported? If there is no local school or safe route to walk to school should the number of daily trips be increased? Alternatively should crossing guards be provided? How would they be funded?

With an average of eight to ten trips per day the 4000+ units could generate over 40,000 individual trips per day. How many tips per day does the average household in Livermore generate? How will these trips affect traffic congestion on major corridors like I-580 and SR-84? It should be noted that even a small increase in the number of trips can cause major changes in level of service on already congested roadways. How will these trips affect traffic at the Isabel and Airway interchanges and access to the proposed parking structure? What design factors are important to allow rapid filling of the parking structure to avoid traffic backups? Will this project be able to meet the City requirements of level of service C on local roadways away from the interchanges? What sort of traffic improvements might be required and how will they be funded? How will this project meet minimum traffic level of service requirements?

Regional Impacts

In the program EIR for the One Bay plan many of the mitigations were related to existing General Plan and other local land use requirements and regulations. Examples are noise and visual impacts. While the project can address the limited local impacts or declare overriding considerations that does not address regional impacts. What are the cumulative regional implications and impacts of reducing or eliminating those requirements on a project by project basis throughout the Bay Area? As an example operational constraints on a single

airport may have little effect if this occurs at a number of diverter or business airports it could have a major impact on regional air service and safety.

Waterways and Storm Drainage

The network of creeks and waterways in the Isabel area together with the quarries, golf course and chain of lakes form a critical wildlife corridor between the Mount Diablo region and the balance of the Diablo and Coastal Ranges. Without it the ten lane I-580 freeway forms an impenetrable barrier to the migration of many species of wildlife including endangered and threatened ones. The fragmentation of habitat will increase the probability that some of these species will become extinct either locally or over their entire range. When this area was annexed to the City of Livermore this was realized and wildlife corridors were established along Cayetano, Collier and Cottonwood creeks as well as the arroyo Las Positas. It is important to keep these corridors dark, quiet and undisturbed by humans and their predatory pets. Is this possible with intensive urban residential development? Would recreational and park development be compatible with this protection? Should wide corridors (200 feet) along these waterways be securely fenced off from disturbance from the pastures north of any intensive residential or commercial development to south of I-580? How would the cost of installation and maintenance be funded? What other mitigations might be needed? Have you contacted Save Mount Diablo as part of the community outreach? The various creeks are deeply incised with the channel 10 to 20 feet below the general landform. This helps keep them isolated and allows animals to move freely. This however represents a major hazard if they were to be used for recreation. Also the relatively cool creek bottoms provide critical habitat for a number of endangered species. Will the creeks be retained in their existing state? If they are recontoured who will be responsible for the habitat restoration and what will be the estimated costs and funding sources?

Maintaining clean creek environments, protecting the water quality in the bay and preventing downstream flooding requires that storm water runoff be treated and the flow rate controlled. Also it is desirable to maximize infiltration to provide recharge to the groundwater basin that the region depends upon for municipal and agricultural water capture and storage. City of Livermore to remain in compliance with regional flood control and urban runoff requirement has a number of required mitigations measures incorporated in the Storm water Requirement Check List that must be met to obtain a Municipal Regional Storm water Permit. Based upon the fact that this proposal will result in more than 10,000 square feet of new impervious surface it will apply to this project. How will this proposal meet these requirements? Will infiltrations and onsite bio treatment be used on a site by site basis? Will there be maximum allowed lot coverage of impervious surface to allow this be requirement to be met? Will there be a development area wide plan using one or more substantial area retention basins? How would this be funded and how large in area and where will the basins have to be located? This project will be larger than one acre and based upon hydrological studies will the proposal's impact be large enough that it will be a Hydromodification Management Project? If so in general terms what will the Hydromodification Management

Plan look like? What sort of storage will be required and where will it be located? Is it possible to develop an appropriate plan without knowing the size and location of these potentially substantial basins?

Shade and open green areas are important to maintain the livability of the unusually hot and arid local climate. Because of the high evaporation and transpiration rates street landscaping, green areas and parkland will require irrigation to remain viable. Also because of the intense development it will be difficult to use water trucks. Will a distributed irrigation system be required? Can rainwater capture be used? Where and how could recycled water be used? How will the installation and maintenance of these systems be administered and funded?

Economics

Livermore's General Fund spending is low on a per capita basis compared to surrounding communities and is having difficulties fully meeting the needs to fund deferred maintenance costs, capital improvements and increasing deferred pension funding. Personnel and services have been reduced because of the great recession. Where will the City's \$40 million in contributions to the BART extension costs come from? The City's policy is that growth should pay its own way. How will the infrastructure costs for this project be funded bonds or developer fees? How will the possible use of development fees or land use fees to fund the BART extension reduce City funding? Will an area wide Community Service District be set up? Where will funding for needed road expansion such as interchange improvements, connection of North Canyons Parkway to Dublin Boulevard and upgrades to Collier Canyon come from? How will the pedestrian bridge be funded? In terms of ongoing operating costs will this project generate sufficient funds to meet its needs? Because of Proposition 13 apartments that are not reassessed can become a drag on City services. Will there be a limit on the percentage of rentals or perhaps a requirement that they be held in such a manner that they are reassessed upon transfer of ownership? If needed how will new school construction be funded? Will this project be required to fully contribute to the North Side open space acquisition funding? Will this project be required to compete in the City's HIP? Will there be any use of existing unused permits? Will the project be limited to a maximum number of building permits per year with limits on carryovers? Will there be density bonuses or bonuses for low income housing that could increase density?

Climate

The area of the proposed project is located in a hot and arid area with relative cool winters. The proposed project seems to be designed for the more temperate bay or coastal climate. The high density, limited, large amounts of pavement and sidewalks, use of air conditioning and air filtration, elevators and security lighting will increase peak temperatures. What is the expected "heat island" effect expected? How will the HVAC costs and GHG generation compare to buildings nearer the bay? What special design requirements will be implemented to reduce energy and GHG's. Will the residential units be designed allow for west- east cross ventilation or will the buildings have to be sealed because of poor air quality? Design for energy efficiency could include masonry construction with a large thermal mass, limiting south and west facing windows or having these windows shaded and requiring large amount of

green spaces between buildings. How will these hot temperatures affect pedestrian and bicycle usage and peak parking and traffic?

Visual Resources

For over 40 years Livermore has worked to protect the panoramic scenic views of the rolling hills and ridgelines of the low hills surrounding the City. The General Plan provides a significant amount of and detailed set of requirements for development of projects along the I-58- corridor. Could you offer a detailed account of how this project will meet these requirements? Will a City sponsored project require the same detailed analysis as that of a private developer? What fraction of the scenic corridor offers a relatively unobstructed view of the northern hills going in both the east and west directions? What percentage of this view would be obstructed by the proposed project? Was there an alternative that offered significantly more protection to the Scenic Corridor considered? If not why? What will the freeway view look like at build out of this project?

In the scenic corridor the buildings near the freeway have been low rise with significant landscaping and separation. How will the new proposed construction integrate with the existing designs as to massing, height and form? How much of the proposed development will fit under the existing view angles that re designed to preserve vies of specific features such as hillsides, canyons and ridgelines? How does the requirement that the office structures directly adjacent to the freeway affect the ability to provide brief glimpses of the hills through view corridors? What is the probability that this project will result in sound walls along the north side of I-580. What is likely to b3e the extent and height of these sound walls? If constructed will there be a large landscaped buffer area between the sound walls and the travel lanes?

In the illustrations you show a number of Livermore buildings that could represent the types of building construction in various project areas. The landscaping and opens space are an important part of the appearance of a development. Could you provide the unit density of these projects and compare it to the proposed project densities?

Senior Housing

One of the higher density illustrations is Heritage Estates. This is a congregate living and assisted living project on Murrieta and Stanley. The units range from 300 to a few 1200 square foot units with average being between 500 and 600 square feet. The average market rate rent is \$5500. I believe that this project accommodates almost 500 units on about 11 acres, the highest residential density in Livermore. It appears that with the graying of the east bay there is a significant demand for this type of housing. It appears that if the demand is large enough most of the required units could be accommodated under the scenic corridor view angles along Portola Avenue with a significant freeway setback leaving more room for surface parking increasing ridership.. Seniors also have fewer cars and the projects will place fewer demand on a wide range of infrastructure (schools, parks, public transit, etc.). The projects also provide dining facilities, van service, pools and gyms as well as open space and community gardens and orchards. This type of development would lend itself to air filtration and in general hearing acuity decreases with age. Why is this not a a viable option to both

meet unit requirements and protect the airport operations and the scenic corridor?

Schools

The existing conditions say that the new elementary students could be accommodated at Rancho Las Positas. At build out the number of elementary students will be about 500. The maximum capacity of Rancho is about 800. Are there 500 vacant spaces? If not will school boundaries have to be changed? Another option is too have some of the students attend the Tri valley Charter School. Could you comment on the long term stability of this school> what are its current difficulties with the LVJUSD New Jerusalem School District, the California Department of Education and the City of Livermore? How stable are its board and administration? How can elementary and middle school students safely walk or bike to school? If parent have to drive them how will this affect GHG's?

If there is insufficient capacity is there any nearby five acre site that could be used for an elementary school? Or alternatively a ten acre site for a combined elementary middle school?

Scenic Corridor

Broad natural vistas of the rolling hills and ridgelines are one of the prime amenities of living in the Livermore valley. The Scenic Corridor requirements have been a major portion of Livermore's General Plan for many years. They are an important part of maintain and aesthetically pleasing community appearance, distinguishing Livermore from surrounding communities and establishing community character and branding. The proposed project could have a major effect on the appearance of the scenic corridor and would set a precedent for the rest of the Priority development Area and the remainder of the scenic corridor.

Air Quality and Greenhouse Gases

Poor air quality in the area proposed for residential development is a major health risk. This area has the worst ozone and oxides of nitrogen pollution in the Bay Area. Because of the adjacent I-580 freeway with its high level of congestion and large proportion of heavy diesel trucks the particulate levels are also probably the worst in the Bay Area. Because of the recent climate changes and increasing traffic and congestion on I-580 these levels are likely to increase substantially. Increased business jet traffic and the BART trains themselves may add to the particulate loading. These pollutants are particularly dangerous for groups such as children, seniors and those with preexisting respiratory impairment or disease. Particulates generated from diesel engines have been shown to be particularly dangerous because they carry carcinogenic compounds deep into the lungs.

What are the current measured levels of these pollutants at various locations at the proposed site? Will they be measured at differing heights comparable to the proposed residential building heights? Are the effects of the various pollutants synergistic? Given the measured values what are the likely health impacts? What are the Bay Area Air Quality management District guidelines? What are the BAAQMD suggested mitigations guidelines and mitigations? Which of these mitigations are explicitly incorporated into the proposed plan?

One proposed mitigation is air filtration for the residential units. Is this practical for individual condo and apartment units? What is the impact on cost energy requirements and the additional GHG generation? Once installed is there a designated government entity responsible for the inspection and enforcement of adequate ongoing maintenance? Are there any examples of this type of system's long term successful operation in residential apartments and condominiums?

Water Availability

Under drought conditions Livermore as had water rationing for the past two years. The large

increase in the number of housing and increased office space represents a significant increase in potable water demand. At build out how does the proposed development compare with the demand from the existing General Plan? Without new sources of supply or long term storage will this plan result in more stringent rationing during drought periods? What new sources of water supply and storage will this proposal provide? Could this project fund a reverse osmosis facility to provide a new water source since recycled water is available onsite? Could increased water storage be provided by a dam along the Collier creek?

What new water conservation measures should be implement to reduce demand beyond low flow fixtures and the use of recycled water for irrigation? Will each unit be required to have a separate meter to allow for monitoring of excessive water use? Would a dual water system that uses recycled water for toilets and other non-potable uses be a viable partial mitigation requirement? Could additional water supplies or storage be purchased much like that done for Dougherty Valley development? Can this project meet the water supply requirements of the adopted SAVE initiative (appendix D of the General Plan)? That is "No further residential permits are issued ... until satisfactory solutions exist to the following problem: 3. Water Supply – no rationing of water with respect to human consumption or irrigation and adequate water reserves for fire protection". What new water sources, transport and storage will be needed to insure a sustainable water supply? How will this be funded without impact to existing residents?

Airport Protection Area

As part of the planning for the Priority Development Area surrounding the Isabel BART station there has been consideration of reducing the Livermore Airport Protection Area. The Airport Protection Area was established after over a year of study of other bay area airports and the difficulties they had because of nearby development. Livermore's previous airport was forced to move to its current location because of nearby development. Livermore now has hundreds of millions invested in the current airport. The Airport Protection Area has protected the airport from noise complaints as well insured the safety and wellbeing of Livermore's residents. It has prevented residential development under the airport traffic pattern as well as discouraged other inappropriate uses such as schools, hospitals and child care facilities for almost 20 years

The Airport Protection Area establishment required protracted negotiations between land owners, the Cities of Pleasanton and Dublin as well as Alameda County. With current development pressure and development patterns once there is any reduction in the Airport Protection Area it would be difficult to reverse. Any reduction would likely be a precedent for other communities to seek to further weaken the airport protections.

The Livermore Airport is the fourth busiest in the bay area. The is a fleet of over 600 business jets, war birds, vintage and general aviation aircraft based there. Its use are likely to increase with new Tri Valley businesses, other airports closure, a new FBO and administrations building and lower fuel costs. Any changes In the Airport Protection Area should involve input from the local pilots, the airport commission and the airport related businesses as well as the community as to public safety, noise and possible effects on airport operation. Has this been done and where is this input available?

Noise is complaints are likely to be significant problem in the area proposed for removal. This is likely to be most intense in the area slated for development south of I-590.

Will there be a detailed assessment made of the noise impacts on the proposed development? Will it include the cumulative impacts of traffic rail and aircraft noise? Since the various noises are variable (BART, aircraft fly overs, and motorcycles and trucks) will $L_{AN,T}$ contours as well as L_{DN}

measurements be made? At what locations will the measurements be made? One of the major noise mitigations will be the “wall” of office buildings along the I-580 freeway. Will regulations be enforced to insure that these buildings are constructed before the nearby residential development is built? What are the state or Caltrans criteria for constructing sound walls? Are there any assurances that if residential development occurs sound walls will not follow?

Are modifications in airport operations likely to be caused by the reduction in the Airport Protection Area? One proposed example is directing more operations to the south runway or even extending the south runway to allow larger (and noisier) aircraft to use it. What might be the noise impacts on existing neighborhoods in Livermore and Pleasanton? If there are significant organized noise complaints what will be the cost to again relocate the Livermore Airport?

In regard to safety what is the most serious accident that can be foreseen for this area? For example what would the impact be if a fully fueled business jet impacting a multistory apartment building? How would this impact compare to the same event occurring with a single story light industrial building? Will clustering of development be possible to allow for large open areas for emergency landings?

Fire Protection

The nearest fire equipment available to fight fires in taller residential buildings is located in Pleasanton on Santa Rita Road. What would the response time be on a busy Friday afternoon? The current fire station at the airport is located in a temporary building. Based upon demand at build out what would be the optimum location for this station when a permanent structure is built?

Crime

Could you comment on the fact that crime seems to increase with local population density? How does the type of development around BART stations affect crime? For example the East Dublin Station seems to have little problem with crime outside of the BART station and parking area. The adjacent uses are office and light industrial together with fortress type condos and apartments with gated access and little connection to the outside environment. On the other hand crime seems to have increased around the West Dublin BART station surrounded by commercial and less defensive residential development. This crime has been everything from shop lifting to drive by attacks and car thefts. It is at a point where Pleasanton is considering a police substation near the BART station. How will crime in the intensely developed urban area surrounding the Isabel BART station be addressed? Will there have to be special design features like security lighting gated parking, fenced courtyard and limited first floor access?

Parks

Since the proposed miniparks do not meet LARPD guidelines for minimum size how will they be funded and how will be responsible for ongoing operation and maintenance? Could a Landscape District be established? Will there be a neighborhood pool, community center, community garden or any art facilities included as part of the local recreation facilities.?

5/30/2016



California Native Plant Society

East Bay Chapter
Conservation Committee

To: Lori Parks, Associate Planner
City of Livermore, Planning Division
1052 South Livermore Avenue
Livermore CA 94550
925-960-4450

Submitted 05/31/2016 via email:
BART2Isabel@cityoflivermore.net
laparks@cityoflivermore.net

Regarding: Isabel Neighborhood Plan Project, near proposed BART station at Isabel Ave

The East Bay Chapter of the California Native Plant Society appreciates this opportunity to address environmental factors potentially affected by the proposed project, especially those affecting native and rare plants under the category of biological resources. This is in response to the Notice of Preparation (NOP) distributed on the Isabel Neighborhood Plan. The California Native Plant Society (CNPS) is a statewide non-profit organization that works to protect California's native plant heritage and preserve it for future generations. The Society's mission is to increase the understanding and appreciation of California's native plants and to preserve them in their natural habitat. We promote native plant appreciation, research, education, and conservation through our 5 statewide programs and 34 regional chapters in California, altogether consisting of about 10000 members. The East Bay Chapter covers Alameda and Contra Costa Counties and represents some 1200 members.

Although the Isabel NOP mentions focus on half mile radius from the proposed BART station, we would like to address the project as an entire neighborhood plan area for purposes of programmatic environmental assessment. Pursuant to the mission of protecting California's native flora and vegetation, CNPS submits the following comments for the NOP regarding the Isabel Neighborhood Plan:

This Livermore and Tassajara region is rich with documentation of vernal pools and alkali habitat (Lake, 2016). Even though large swaths have been built upon, there is the potential for a lot of plants on "undeveloped" land and even in small pockets around previously developed land. As outlined in the project visioning summary, key assets for residents in the Livermore area include access to open space, scenic views, and overall visual quality (including open fields, arroyos, trees, and views of the hills), where a successful neighborhood needs physical access and visual connection to natural open spaces. We encourage the City of Livermore to take advantage of the opportunity to

evaluate native plant resources in the Neighborhood Plan area and incorporate their preservation to meet the General Plan's goals for conservation. Creeks in the Neighborhood Plan should be considered for both restoration of riparian habitat and for outdoor recreation (trails, picnic areas, etc.). All remaining native plant occurrences in this increasingly rare habitat should be preserved, and considered for serving purposes of maintaining natural open space and a demonstration area for interpretive education on the importance of the native plants and successful vegetation restoration.

The following are actions East Bay CNPS fully supports and encourages:

- Concentrating on alkali, vernal pool, and riparian or wetland habitats all potentially present, survey for these specific locally and statewide native rare plants (CNPS Inventory of Rare and Endangered Plants rankings included):
 - Hairless popcorn flower (*Plagiobothrys glaber*) 1A
 - Congdon's tarplant (*Centromadia parryi* ssp. *congdonii*) list 1B.1
 - Palmate-bracted bird's beak (*Chloropyron palmatum*) 1B.1
 - Lesser saltscale (*Atriplex minuscula*) 1B.1
 - Prostrate navarretia (*Navarretia prostrata*) 1B.1
 - Livermore tarplant (*Deinandra bacigalupii*) 1B.2
 - Saline clover (*Trifolium hudsonophilum*) 1B.2
 - San Joaquin spearscale (*Etriplex joaquinana*) 1B.2
 - Brittscale (*Atriplex depressa*) 1B.2
 - Heartscale (*Atriplex cordulata*) 1B.2
 - Hispid bird's beak (*Chloropyron molle*, ssp. *hispidum* and ssp. *molle*) 1B.2
 - Alkali milk vetch (*Astragalus tener*) (*A. tener* varieties 1B.1/ 1B.2)
 - Crownscale (*Atriplex coronota*) (*A. coronata* varieties 1B.1/ 1B.2/ 4.2)
 - Little mouse tail (*Myosurus minimus* ssp. *apus*) 3.1
 - Stinkbells (*Fritillaria agrestis*) 4.2
 - Alkali goldfields (*Lasthenia ferrisiae*) 4.2
 - Saltgrass (*Distichlis spicata*)
 - Hoover's downingia (*Downingia bella*) (and other *Downingia*)
 - White headed navarretia (*Navarretia leucocephala*)
 - Semaphore grass (*Pleuropogon californicus*)
 - Yellow owl's clover (*Castilleja campestris*) (and other *Castilleja*)
 - Spike saltbrush (*Atriplex dioica*)
 - Vernal pool goldfields (*Lasthenia fremontii*)
 - Broad toothed monkeyflower (*Mimulus latidens*) (and other *Mimulus*)
 - Boraxweed (*Nitrophila occidentalis*)
 - Western sea purslane (*Sesuvium verrucosum*)
 - Nutall's alkali grass (*Puccinellia nuttalliana*)



- Survey for rare plant communities following classification system of A Manual of California Vegetation (Sawyer, Keeler-Wolf and Evens 2009 (MCV II), which is the current standard for categorizing vegetation such as (but not limited to): Fremont's goldfields- Saltgrass alkaline vernal pools; Alkaline/ Alkali marsh, grass land, and weed- salt grass playas and sinks, etc.
- Survey for and protect alkaline soil types known to occur in the region, which often harbor locally rare native plants, as referenced.
- Survey for and protect wetlands and riparian areas, especially emphasizing areas immediately east and west of Isabel Ave, and restoring creek corridors with native vegetation where possible.
- Support buffer of at least 200 feet around Collier Canyon Channel and Creek, and Arroyo Las Positas waterways in southeast portion of land, at least 200 feet, increase plans for open space and demonstration areas that also support native and rare plants.
- Support keeping as many oaks as possible that already exist on site, and all existing native vegetation and rare plants, especially at and near riparian areas.

CNPS recommends utilizing available reference resources for appropriate identification of the affected plants and vegetation environments. Use of these resources will allow for educated decisions regarding mitigation policies and preservation decisions. A selection of resources are listed below and include the EBCNPS Unusual Plants online database, Calflora, CNDDB, Eastern Alameda Conservation Strategy (especially plant species considered for inclusion as focal species), and the EBCNPS Botanical Priority Protection Areas (BPPA).

Two of our BPPAs are of particular note to this commission: The alkaline valley bottoms of the East Dublin and Tassajara BPPA provide a home for unique plants such as Congdon's tarplant which is undergoing initial evolutionary divergence here in East Dublin and which would be significantly impacted if open space lands such as those in Doolan Canyon were developed. The Springtown BPPA covers the open space lands in North Livermore. Its core is the Springtown Alkali Sink ecosystem which occupies lands immediately north of Livermore's "Springtown" subdivision – in and around the Springtown Wetlands Preserve. Vegetation typical to these BPPAs may be found in the Isabel Neighborhood Plan area, and even in small quantities, these populations and land are valuable. We agree that the cumulative effects of this project may cause significant irreversible environmental changes and unavoidable effects.

Below are questions East Bay CNPS has regarding the Isabel Neighborhood Plan:

- There is a nearby Shea Homes development currently under construction near intersection of Portola Ave and Isabel Ave. Will this programmatic EIR



encompass this area? Should valuable soil types and their accompanying locally rare native plant life occur in any development footprint, preserving it and its watershed should be considered.

- Is the nearby Springtown Preserve already being considered as a mitigation bank for development plans such as the Isabel Plan?
- Placing a public transport station and large development immediately next to Urban Limit Line boundaries implies a lack of faith for maintaining respect for these boundaries, and possible future development creep into surrounding open space. Does the Isabel Neighborhood Plan implicitly encourage future Urban Limit Line expansion?
- The Isabel Plan states that only about 150 of 1100 acres is “undeveloped”, but how is this defined? CNPS asserts that even areas previously developed, may contain native rare plants and should be evaluated as such.

Concluding remarks:

The East Bay California Native Plant Society generally supports preference for public transport expansion and high density housing, over other options such as expanded highways, road developments and low density housing. We recognize that planning for lower density development is correlated with expanded destruction of native plant resources we value intrinsically, so we generally prefer higher density development planning. Similarly, we support reinforcement of Urban Limit Lines. We are generally optimistic and supportive of a BART extension inasmuch as it supports preservation of valuable remaining native plant habitat and supports “regional and citywide goals related to... open space protection” as stated in the NOP (including maintaining urban limit lines), and appreciate smart development supporting these objectives.

Sincerely,
Karen Whitestone
(submitted electronically)
Karen Whitestone
Conservation Analyst

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www.ebcnps.org
<http://ebcnps.wordpress.com>



References for further information:

- ❖ Lake, Dianne: Rare, Unusual and Significant Plants of Alameda and Contra Costa Counties [web application]. 2016. Berkeley, California: East Bay Chapter of the California Native Plant Society [a non-profit organization].
URL: <https://ebcnps.fatcow.com/cgi-bin/ebrare/ebrare.cgi> (Accessed: May 31, 2016).
- ❖ Calflora: Information on California plants for education, research and conservation. [web application]. 2016. Berkeley, California: The Calflora Database [a non-profit organization]. Available: <http://www.calflora.org/> (Accessed: May 31, 2016).
- ❖ California Native Plant Society: The California Rare Plant Ranking System <http://www.cnps.org/cnps/rareplants/ranking.php> (Accessed May 31, 2016)
- ❖ East Alameda County Conservation Strategy. 2009. [web application]. <http://www.eastalco-conservation.org/documents.html> (Accessed: May 31, 2016).



From: Gdjacoby@aol.com
To: [BART 2 Isabel](#)
Subject: Livermore Venture Partners Scoping Request Isabel Neighborhood Plan
Date: Tuesday, May 31, 2016 1:16:05 PM
Attachments: [LVP Isabel Neighborhood Scoping attachments.pdf](#)

May 31, 2016

Sent to : BART2Isabel@cityoflivermore.net

Lori Parks, Associate Planner
City of Livermore, Planning Division
1052 South Livermore Avenue
Livermore, CA 94550

Re: EIR Scoping: Isabel Neighborhood Plan

I am writing on behalf of Livermore Venture Partners (LVP), which owns the triangular parcel (APN 903-10-1) surrounded by the City of Livermore within the Isabel Neighborhood Plan area (Attachment 1). On the east side of the LVP parcel is Las Positas College. (LVP owns also a 7.5-acre parcel in-holding surrounded on the north south by College property (Attachment 2)). To the west of the LVP parcel within the City limits are housing and vineyards, which 17 years ago LVP helped enable by granting/annexing a of portion of LVP property into the City. LVP requests that the City analyze and consider this LVP parcel for inclusion in the Isabel Neighborhood Plan and DEIR. At minimum, we request that the LVP parcel be included in an EIR Alternative section of additional sites that might be needed for the City to achieve Plan Bay Area PDA market and affordable housing goals.

Location Reasons for Request

Livermore Venture Partners acquired the property in 1988 at a time when BART was considering extension into the Livermore Amador Valley along the Highway 580 Corridor. Although BART had yet to acquire its Isabel Station property, LVP assumed its parcel would be near a possible station given the parcel's proximity to the College and nearby business parks.

Key LVP Parcel characteristics:

- Within ¾ miles walking and biking distance to the proposed BART Station
- Closer to the proposed BART station than other Isabel Neighborhood Plan parcels
- Adjacent to the College
- Walking/biking distance to nearby industrial/commercial jobs
- Adjacent to public infrastructure (sewer, water, drainage)
- Adjacent to local bus line that serves the nearby area and the future BART station.
- Outside of the critical Airport safety and noise zones
- Outside of the City of Livermore Scenic Corridor
- Parcel large enough to include a variety of strategic uses – Mixed density/market/affordable housing (on between 16-20 acres on flat area at toe of hill); open space trail along drainage area between LVP and the College; vineyards and other open space on the northern sections of the parcel as earlier suggested by vineyard owner on the west side of Collier Canyon

Past Planning on LVP property

In 1991-1994, LVP, Las Positas College, Triad Systems Corporation (Business Park) and Shea Business Properties worked jointly on plan to resolve their future infrastructure needs, including road and utility improvements needed by the College that the State was unwilling to fund. This 4-party effort led to the College and LVP agreeing on City-proposed Collier Canyon realignment and drainage improvements to be located on LVP property. In 1997-99 LVP provided about four acres to enable the realignment. Alameda County LAFCo approved the annexation and the land became a part of the City. The improvements were made a part of the Triad Business Park housing on Collier Canyon Road and the College capital improvements.

In late 2002, the advocates of the Urban Growth Boundary drew a Boundary that was focused on big picture growth issues and that did not recognize unique circumstances along the Boundary. A review of the Boundary line in the Isabel Neighborhood Plan Area highlights the obvious question of why there is a pie-shaped wedge adjacent to the College and Collier Canyon Road that thereby isolates one parcel from the rest of the surrounding City. Since the UGB was prepared as a voter initiative, there was little opportunity to discuss any boundary anomaly. Nor was there any opportunity to question the treatment of LVP, who the City had earlier encouraged to provide land in order to create a better Collier Canyon Road infrastructure/road alignment

Lastly, in 2002 as a follow-on relationship with the College, LVP had preliminary discussions with the College administration regarding other possible joint efforts including affordable housing to benefit the greater College community. In those discussions, LVP involved EAH, one of the Bay Areas' most successful non-profit housing companies. EAH was to be LVP's partner/ project developer of the affordable project on LVP property. (EAH had played a similar role with me in the mid 1990s by developing a 100-unit very low income rental project and childcare facility as part of our 300-acre mixed use business park in Morgan Hill, Santa Clara County) The affordable housing discussions with the College ended in late 2002 with the enactment of the UGB.

Affordable Housing in the Isabel Neighborhood Plan

LVP has read the ABAG/MTC affordable housing guidelines for PDA Plans (Attachment 3) and understands their importance to the overall Plan Bay Area growth and infrastructure funding strategy. We are aware and can understand that the Livermore 2014-2020 RHNA (Attachment 4) represents both an opportunity and challenge for the next phases of the Isabel Neighborhood Plan and DEIR. The Plan will need to define the amount and specifically where affordable housing can be included in the PDA residential opportunity areas. From our participating in the Isabel Neighborhood workshop and reviewing the hearings, we understand the City has a variety of land use matters (airport, scenic corridor) it must resolve in the design of a "specific plan" that provides details on the 3,850 market -rate and affordable units.

Whereas our property now is outside of the UGB, we believe that it could be helpful in achieving the PDA housing goals. To that end, LVP has re-engaged with EAH to consider how best to work on a combined market rate/affordable housing project. Notwithstanding the UGB status, the LVP parcel has the above-described location features that might warrant it being included in the Plan Area. The authors of the UGB line could not have contemplated in 2002 the implication of the UGB on the 2014 PDA/ Plan Bay Area structure. However, the UGB ordinance does provide that the City Council can amend the

Boundary if needed to fulfill the housing obligations of State law. Of course, the Plan Bay Area is a direct response to State law (SB375). Moreover, the UGB ordinance raised the affordable housing bar by requiring that any Boundary-change property provide a higher percentage of affordable housing (35% moderate/low and very low with 20% at low and very low income).

The Isabel Neighborhood Plan and its related EIR provide an opportunity for the City Council to consider limited UGB changes if such adjustments would help the City fulfill regional market and affordable housing goals and better qualify for regional/State/Federal transportation funds.

Therefore, LVP requests, as part of the EIR Scoping, that the EIR include a DEIR Alternative that analyzes new sites, including the LVP site, needed to fully reach the market /affordable housing goals if there are constraints (existing land use regulation/property owner willingness/market) that could reduce the total below the 3,850 goal.

Thank you for your consideration of this Scoping request.

Gordon D. Jacoby
Project Manager
Livermore Venture Partners

Attachments

Attachment 1 – LVP property in the Isabel Neighborhood Plan Area
Attachment 2 – LVP second parcel surrounded by College parcels
Attachment 3 – ABAG/MTC PDA Planning Element Guidance – Affordable Housing
Attachment 4 - City of Livermore 2014-2022 RHNA

*** The City of Livermore's anti-virus application (eSafe) scanned this email for malicious content ***
*** IMPORTANT: Do not open attachments from unrecognized senders ***

Attachment 1 - LVP Scoping Request



Attachment 2 - LUP Scoping Request



Parcel Viewer

Alameda County Assessor's Office

Find Parcel



I want to...



All Available Layers



Criteria

Search Type

APN

Situs Address

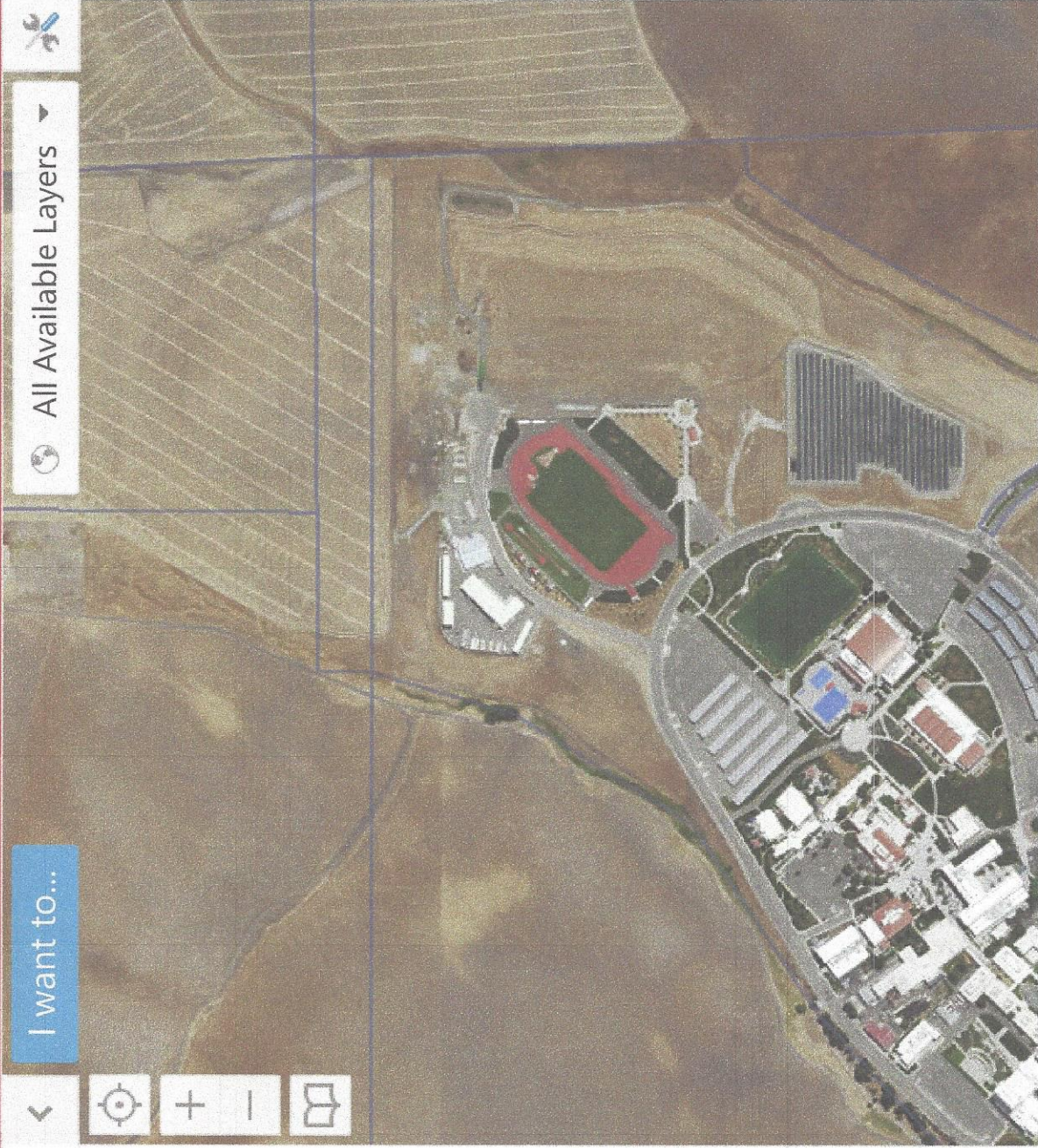
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APN:

903-3-3-4

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Attachment 3- LVP Scoping Request

Appendix 1 PDA Planning Elements Description & Guidance

The following pages document each of the PDA planning elements, including the goal the element should aim to achieve, a description, examples or suggestions about what to include in the development of the element and what the deliverable should include. This information provides PDA planning grantees with an expectation of the scope for each element and what MTC/ABAG will be looking for in submitted deliverables.

Priority Development Area (PDA) Profile

Goal: Brief initial report providing an overview of demographic and socio-economic characteristics of the planning area, transit/travel patterns and use, physical aspects of the planning area, as well as any known issues that will need to be considered or addressed in the planning process. Context for the relationship between the planning area and the jurisdiction's surrounding area should be provided.

Data sources should include the US Census, as well as other planning efforts.

Results from the PDA Profile should inform subsequent planning elements.

Measures to be included or described in the PDA Profile

- Population
- Age
- Ethnicity
- Language
- Place of birth and residence
- Disability
- Households
- Employment
- Income and poverty status
- Household tenure and costs
- Place of work
- Travel mode to work
- Vehicle availability
- Travel time to work
- Physical landscape (inventory of housing, jobs, parks, neighborhood amenities/retail, social services, schools/playgrounds, activity nodes, etc.)
- Known issues or concerns to be included in the planning process

Deliverable: Report containing the above-referenced measures describing the planning area. The information contained in this report should be referenced throughout the planning process in the development of subsequent planning elements.

Affordable Housing and Anti-Displacement Strategy

Goal: Develop a strategy to provide existing and future plan area residents with a range of housing options that are affordable to households at all income levels. The strategy should describe the existing demographic and housing profile of the area, quantify the need for affordable housing, identify specific affordable housing goals for the plan, assess the financial feasibility of meeting the need for affordable housing, and identify strategies needed to meet the affordable housing goals.

To limit or prevent displacement in the area, the strategy should identify how non-subsidized affordable housing units in or neighboring the plan area may be impacted by the plan build-out. The plan should describe existing preservation policies to maintain neighborhood affordability and additional zoning changes or policies needed. The anti-displacement strategy may also include the maintenance and enhancement of small businesses, services and community centers that serve lower-income residents.

Elements to include in Affordable Housing and Anti-Displacement Strategy:

Assessment of Existing Conditions

- Describe the demographic characteristics of the existing population in the plan area, including factors such as income levels, ethnic/racial composition, and presence of low-income renters (who are at greatest risk of displacement)
- Describe the housing characteristics in the plan area, including factors such as housing tenure, household size, and housing affordability for both deed-restricted and market-rate units
- Describe market conditions that affect the provision of affordable housing, such as land availability and value, obstacles to development in the plan area, and existing affordable housing policies (e.g., inclusionary zoning, rent control or stabilization policies, housing preservation programs, etc.)

Quantification of Affordable Housing Need

- Quantify the expected need for affordable housing, by income level, in the plan area based on the characteristics of the existing and expected future population
- The statement of need should not be limited by estimates of what seems feasible

Identification of Goals

- Consider goals such as:
 - No net loss of affordability in the plan area
 - Total number of affordable units, by income level, that will be accommodated in the plan area
 - Target for percentage of total units that are affordable
- Demonstrate consistency with the jurisdiction's Regional Housing Need Allocation and the sites and policies identified in the Housing Element

Feasibility Analysis

- Assess the amount of affordable housing, by income level, that is likely to be produced by the market
- Estimate the public financial burden and the private costs required to meet the identified housing need
- Identify potential funding sources available to develop affordable housing
- Identify the "gap" between the dollar amount needed for affordable housing and the potential sources available

Implementation Strategy

- Identify specific strategies to retain existing affordable units
- Specify the location and type of units (size, tenure, etc.) to be developed in the plan area
- Identify funding sources that will be used to preserve or add affordable housing
 - Local sources (bonds, impact fees, housing trust fund, etc.)
 - State and Federal sources (HOME, CDBG, tax credits, grants, etc.)
 - Other

- Identify policies that will be used to preserve or add affordable housing
 - Inclusionary housing
 - Housing trust fund
 - Reduced parking standards
 - Rehabilitation programs
 - Land trusts
 - Foreclosure mitigation
 - Other

- Identify policies that will be used to avoid displacing existing residents
 - Engagement of communities likely to be displaced
 - Economic development (locally owned businesses, local hire, new area jobs that meet residents' skill levels)
 - Enhancement of community centers and facilities

Deliverable: A report that outlines the plan's approach to providing a range of affordable housing options to existing and future residents, based on the elements identified above.

Appendix C: FINAL REGIONAL HOUSING NEED ALLOCATION (2014-2022)

	Very Low 0-50%	Low 51-80%	Moderate 81-120%	Above Moderate 120%+	Total
REGION	46,680	28,940	33,420	78,950	187,990
Alameda County					
Alameda	444	248	283	748	1,723
Albany	80	53	57	145	335
Berkeley	532	442	584	1,401	2,959
Dublin	796	446	425	618	2,285
Emeryville	276	211	259	752	1,498
Fremont	1,714	926	978	1,837	5,455
Hayward	851	480	608	1,981	3,920
Livermore	839	474	496	920	2,729
Newark	330	167	158	423	1,078
Oakland	2,059	2,075	2,815	7,816	14,765
Piedmont	24	14	15	7	60
Pleasanton	716	391	407	553	2,067
San Leandro	504	270	352	1,161	2,287
Union City	317	180	192	417	1,106
Alameda County Unincorporated	430	227	295	817	1,769
	9,912	6,604	7,924	19,596	44,036
Contra Costa County					
Antioch	349	205	214	680	1,448
Brentwood	234	124	123	279	760
Clayton	51	25	31	34	141
Concord	798	444	559	1,677	3,478
Danville	196	111	124	126	557
El Cerrito	100	63	69	166	398
Hercules	220	118	100	244	682
Lafayette	138	78	85	99	400
Martinez	124	72	78	195	469
Moraga	75	44	50	60	229
Oakley	317	174	175	502	1,168
Orinda	84	47	54	42	227
Pinole	80	48	43	126	297
Pittsburg	392	254	316	1,063	2,025
Pleasant Hill	118	69	84	177	448
Richmond	438	305	410	1,282	2,435
San Pablo	56	53	75	265	449
San Ramon	516	279	282	340	1,417
Walnut Creek	604	355	381	895	2,235
Contra Costa County Unincorporated	374	218	243	532	1,367
	5,264	3,086	3,496	8,784	20,630



SAN FRANCISCO BAY AREA RAPID TRANSIT DISTRICT

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2016

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8TH DISTRICT

Tom Radulovich
9TH DISTRICT

May 31, 2016

Lori Parks, Associate Planner
City of Livermore, Planning Division
1052 South Livermore Avenue
Livermore, CA 94550

Re: Comments on the Notice of Preparation for a Program Environmental Impact Report for the Isabel Neighborhood Plan

Dear Ms. Parks,

Thank you for the opportunity to comment on the Notice of Preparation (NOP) for a Program Environmental Report (EIR) for the Isabel Neighborhood Plan (INP). BART is supportive of the City's efforts to establish the Isabel Neighborhood as a transit-oriented, livable, and sustainable community. As you are aware, BART is also developing an EIR for the BART to Livermore Extension Project. To ensure smooth integration between the INP and the BART to Livermore Extension Project, BART encourages the City of Livermore to continue to work collaboratively with BART on our respective EIRs. BART has reviewed the INP NOP and respectfully submits the following comments:

Comment 1:

The INP has the potential to be supportive of the BART to Livermore Extension Project. To maximize the potential, BART encourages the City of Livermore to advance an INP with the maximum possible number of households and jobs within 1/2 mile of BART's proposed future Isabel station. BART urges the City to consider inclusion of a higher density alternative that best provides benefits to the region by locating high-density development near proposed transit.

Comment 2:

The INP will identify residential, commercial, retail and other land use designations for much of the land within 1/2 mile of BART's proposed future Isabel station. Establishing good walking and biking access routes from future residential and employment locations in the INP with the future Isabel station will support the City's stated overarching goal for the INP of creating a vibrant, safe neighborhood that takes full advantage of the regional rail investment and supports the City's goals, including supporting the BART extension to Livermore.

To access the quality of walking connections, BART requests that the INP EIR include maps showing the walking route from various parts of the INP area to the future Isabel station, information on the number of households and the number of jobs within a 10-minute walk and a 5-minute walk from the future

Isabel station, and to provide information on the quality of the walking environment to the future Isabel station.

To access the quality of biking connections, BART requests that the INP EIR include maps showing the biking route from various parts of the INP area to the future Isabel station, information on the number of households and the number of jobs within a 10-minute bike ride and a 5-minute bike ride from the future Isabel station, and to provide information on the quality of the biking environment to the future Isabel station.

Comment 3:

The Governor's Office of Planning and Research has issued proposed modifications to the CEQA Guidelines implementing Senate Bill 743. A key feature of the proposed modifications is to replace the use of Level of Service as a CEQA measure of transportation impacts with Vehicle Miles of Travel. BART encourages the City of Livermore to use the proposed new measure to identify transportation impacts associated with the INP.

Comment 4:

To assess the likelihood of INP build-out, the EIR should include an assessment of the market for household, commercial and retail development in the INP area.

Comment 5:

BART encourages the City to include a summary of pedestrian, bicycle, and transit-supportive policies that will reduce overall reliance on the automobile in the Plan Area, thereby resulting in GHG and pollution-reduction. Such policies may include:

- Transportation Demand Management strategies.
- Minimum densities (in addition to proposed maximums).
- Best practice parking policies, such as low or no minimums, parking maximums, required bicycle parking, shared parking allowances, and unbundled parking.

We look forward to continuing to work collaboratively with the City of Livermore as we advance our respective EIRs. If you have any questions, please contact Andrew Tang, Principal Planner at (510) 874-7327 or by e-mail at atang@bart.gov.

Thank you again for the opportunity to provide input on this plan.

Sincerely,



Val Joseph Menotti
Chief Planning and Development Officer

CC:

Andrew Tang
Hannah Lindelof
Don Dean
Richard Fuentes

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