

CENTRAL CONTRA COSTA SANITARY DISTRICT

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Sent via Email

August 11, 2020

Mr. Dave Vautin Metropolitan Transportation Commission 375 Beale Street, Suite 800 San Francisco, CA 94105

Dear Mr. Vautin:

Thank you for the opportunity to comment on the *Plan Bay Area 2050 Draft Blueprint*. Many of MTC Commissioners serve on their local LAFCOs and can attest to the importance of the issues discussed below.

Contra Costa LAFCO echoes the comments submitted by San Mateo and Santa Clara LAFCOs regarding LAFCO's mission, role, and responsibilities. LAFCO is charged with balancing the competing interests of preserving agricultural and open space lands, while encouraging logical and orderly growth and development, and the efficient extension of public services. LAFCO law also includes special provisions relating to disadvantaged unincorporated communities (DUCs), including stipulations which support extending municipal services to these areas.

In 2010, the nine Bay Area LAFCO Executive Officers met with staff from ABAG, BAAQMD, BCDC and MTC to discuss development of the inaugural *Plan Bay Area*. At that time, the Bay Area LAFCOs suggested that the *Plan Bay Area* reports consider the LAFCO established spheres of influence (SOIs) for each city and special district, as the SOIs establish areas designated for probable physical boundaries and future municipal services. Further, that *Plan Bay Area* projections recognize special districts as critical service providers. In many counties, including Contra Costa, infrastructure services (i.e., fire, sewer, water, parks and recreation) are provided by special districts to both incorporated and unincorporated areas.

Contra Costa LAFCO previously commented on the *Plan Bay Area* reports and associated environmental documents. As noted in prior letters, we continue to emphasize the following:

- LAFCO establishes a SOI for each city and district. SOIs designate the probable physical boundaries and service areas for cities and districts. Plan Bay Area 2050 should acknowledge the purpose and significance of SOIs in the future growth of the Bay Area.
- Special districts provide a range of municipal services in each county, including fire, sewer, water and parks and recreation. Future growth in the Bay Area cannot occur without special districts. Plan Bay Area 2050 should recognize special districts as critical service providers.
- One of LAFCO's key responsibilities is to preserve agricultural and open space lands. Plan Bay Area 2050 should identify and evaluate potential conflicts with priority development and transit areas and corresponding impacts to agricultural and open space lands.

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- In 1990, Contra Costa County voters approved a countywide Urban Limit Line (ULL) which limits urban development to certain areas within the County and supports the preservation of agricultural lands and open space. Thus, most future development will likely occur in cities rather than in unincorporated areas. Plan Bay Area 2050 should acknowledge the ULL and direct housing/growth near jobs, transit, and existing infrastructure. This will lessen the impacts of sprawl, traffic, greenhouse gas emissions, and premature conversion of agricultural and open space lands. Plan Bay Area 2050 should also promote compact development and efficient delivery of municipal services.
- LAFCOs encourage orderly growth and development and efficient municipal services delivery. Currently, there are 21 unincorporated islands in Contra Costa County, several of which, are located near transit hubs. LAFCO encourages cities to annex these unincorporated islands to maximize municipal services, efficiencies, and land use under a single jurisdiction. LAFCO encourages ABAG and MTC to consider strategies to support annexation of these unincorporated islands which will further the goals of Plan Bay Area 2050.
- ♣ LAFCOs are required by law to prepare Municipal Services Reviews (MSRs) every five years, as necessary. MSRs are used to support changes in SOIs. The LAFCO MSRs provide a wealth of information regarding local agencies and municipal services. MSRs evaluate growth and population projections; present and planned capacity of public facilities, adequacy of public services, and infrastructure needs or deficiencies; financial ability of agencies to provide services; status of, and opportunities for, shared facilities; accountability for community service needs, including governmental structure and operational efficiencies; location and characteristics of DUCs; and other matters related to effective and efficient services. Much of this information is useful in future planning efforts. We urge the Plan Bay Area 2050 team to utilize LAFCO MSRs as a resource in preparing its future planning studies.

Plan Bay Area 2050 has the potential to heighten the public's awareness of these critical issues. Please incorporate our comments into your report as they will enhance its value and provide for a more complete assessment of future growth and municipal services resulting in a more accurate roadmap for the Bay Area's future.

On behalf of Contra Costa LAFCO, thank you for the opportunity to comment and for consideration of our input. Please contact us if you have any questions or wish to discuss our comments. Contra Costa LAFCO looks forward to reviewing all future *Bay Area 2050* documents.

Sincerely,

Michael R. McGill, P.E. LAFCO Commissioner Board President Central San

c: Each Commissioner, Contra Costa LAFCO
Each Executive Officer, Bay Area LAFCOs (Alameda, Marin, Napa, San Francisco, San Mateo, Santa Clara, Solano, Sonoma)