



LOCAL AGENCY FORMATION COMMISSION

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August 7, 2020

Sent Via Email
 Mr. Dave Vautin
 Metropolitan Transportation Commission
 375 Beale Street
 San Francisco, CA 94105

Subject: Comments on Plan Bay 2050 Blueprint Strategies

Dear Mr. Vautin,

Thank you for you for the opportunity to comment on the Plan Bay 2050 Blueprint Strategies. The Plan identifies five Guiding Principles and four Strategies that address the topics of transportation, the regional economy, housing, and the environment. Several of the actions identified by the Plan focus on the construction of housing that is both affordable and near transit, developing infrastructure to provide greater mobility, protecting communities from the impacts of climate change, and providing economic opportunities for all Bay Area residents.

The Local Agency Formation Commission (LAFCo) is a state mandated local agency established in every county to regulate the boundaries of cities and special districts. The development patterns identified in the Plan align with the goals of LAFCos to discourage urban sprawl, encourage orderly growth, and protect agricultural and open space lands. As part of this focus on reducing sprawl, San Mateo LAFCo encourages cities to annex the many unincorporated islands that are scattered through the 20 cities in the county. These islands are wholly or substantially surrounded by a city and are developed with or zoned for single-family homes and commercial and industrial uses. LAFCo adopted spheres of influence place these areas in the sphere of the city that can most efficiently provide municipal services. Supporting annexation of these developed areas consistent with the LAFCo designated sphere of influence will vest land use authority in the agency best able to provide municipal service, remove multi-agency coordination in planning for housing, and streamline facilitating ties to transit. It should also be noted that San Mateo County's General Plan Policies encourage annexation of urban areas within city spheres of influence.

In San Mateo County, several unincorporated islands in City spheres of influence are near existing transit hubs and are identified as or are near Priority Development Areas. Allowing development in these areas to occur in cities would allow for greater cohesion of both transit and land use plans under a single jurisdiction and afford regional and local agencies better opportunities to allocate

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finite resources in a more efficient manner. Additionally, cities as water and sewer agencies can better coordinate supply and capacity in determining density and location of affordable housing in order to meet the City's RHNA allocation.

In other Bay Area Counties, there are Disadvantaged Unincorporated Areas (DUCs) located within PDAs. DUCs are defined as inhabited territory that constitutes all or a portion of an unincorporated community with an annual median household income that is less than 80 percent of the statewide annual household income. State law requires that LAFcos identify and analyze water, sewer and fire service issues within DUCs as part of municipal service reviews, and sphere of influence reviews. State law also places restrictions on annexations to cities if the proposed annexation is adjacent to a DUC.

We would encourage the MTC and ABAG to consider including strategies that support the annexation of the developed, unincorporated areas including DUCs to cities in order to further the goals of Plan Bay Area 2050. One strategy could be grant funding as part of Plan Bay Area 2050 to LAFcos and cities. Many of the LAFcos within the Bay Area have limited budgets and staff, with an average of two full time employees. With grant funding made available to LAFcos and cities for annexation plans for unincorporated areas in or near PDAs, LAFco and cities could coordinate the annexation process, creating service plans, and outreach to residents about the benefits of annexation. The grants to support these annexations would have long lasting benefits for residents, cities, and counties.

Another issue that should be considered in the Blueprint is the role that special districts play in providing municipal service. LAFco also regulates the boundaries and services provided by the 22 independent and 44 county governed special districts. Many of these special districts provide public services, such as water, sewer, and fire protection that are essential to the continued growth and protection of the Bay Area. We encourage MTC and ABAG to engage special districts throughout the Plan Bay 2050 process and to take into consideration the impacts of the Plan's policies on special districts. Each Bay Area LAFco can assist MTC/ABAG in reaching out to the special districts in our respective counties.

San Mateo LAFco looks forward to reviewing all future documents related to Plan Bay 2050 and on behalf of the Commission, thank you for the opportunity to comment.

Sincerely,

A handwritten signature in black ink that reads "Martha Poyatos". The signature is written in a cursive style with a large, prominent initial "M".

Martha Poyatos
Executive Officer