



# City of Newark

Mayor Alan L. Nagy

Attn: Draft Plan/Draft EIR Comment, 375 Beale Street, Suite 800, San Francisco, CA, 94105; or via email (Draft Plan Bay Area 2050: [info@planbayarea.org](mailto:info@planbayarea.org); Draft EIR: [eircomments@bayareametro.gov](mailto:eircomments@bayareametro.gov)).

July 20, 2021

Re: Designation of Census Tract 4443.02 as an Equity Priority Community

Dear ABAG/MTC Staff:

On behalf of the City of Newark, I would like to first congratulate ABAG/MTC on the preparation of the ABAG Draft Plan Bay Area 2050. Newark recognizes the tremendous amount of work and thoughtful community and stakeholder engagement that has gone into this far-reaching Plan for creating a more sustainable and equitable region.

Our city like several others in Alameda County does, however, have serious concerns about the removal of the *Equity Priority Community* (EPC) designation from an area of our city that was formerly designated as a *Community of Concern*. This neighborhood comprising Census Tract 4443.02 continues to face many of the same challenges experienced by lower-income communities of color across the region, made only more acute by the COVID-19 pandemic and related economic crisis. The Tract is above the target threshold for the People of Color demographic factor, and as of the date of the income data utilized for the EPC Framework analysis, only slightly below the target threshold for the Low Income factor.

Newark staff has examined the data and methodology for the EPC framework as applied to Tract 4443.02, and believe that the income characteristics of the Tract taken as a whole are disproportionately impacted by the recent addition of a 271-unit market-rate townhome development, with average sales prices in the range of \$1.3M to \$1.8M per unit. The higher income households living in this newer development appear to have driven up the average income for the tract as whole, yet older neighborhoods in this tract have likely not experienced a dramatic change in household incomes.

The loss of the EPC designation would not reflect the continued challenges faced by a significant number of lower-income residents of color in this area of our city and could unfortunately lead to the loss of grant and other funding that would be of great benefit to struggling households and neighborhoods.

Taking into account the above, Newark strongly recommends that ABAG/MTC reconsider the EPC methodology to account for changes in sub-geographies within a Census Tract, including at the Block Group or Block levels of geography. We believe that this more fine-grained analysis would reveal continuing demographic patterns and characteristics that merit designating at least some portion of the City of Newark within this Tract as an EPC.

Thank you for the opportunity to comment, and we look forward to participating in the EPC evaluation process in the future.

Sincerely,

ALAN L. NAGY  
Mayor



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