

August 11, 2020

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

SUBJECT: Alameda LAFCO Comments on Plan Bay Area Blueprint Strategies

Dear Mr. Vautin,

Thank you for the opportunity to comment on the Plan Bay Area 2050 Blueprint Strategies. The Plan identifies five Guiding Principles and four strategies that addresses 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 urban sprawl, Alameda LAFCO encourages cities to annex unincorporated islands that are scattered within the county. These islands are wholly substantially surrounded by a city and are developed with or zoned for single-family homes and commercial and industrial uses.

LAFCO's 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 services, remove multi-agency coordination in planning for housing, and streamline ties to transit.

In many Bay Area counties, including Alameda, Disadvantaged Unincorporated Communities (DUCs) are located within Priority Development Areas (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 (MHI). State law requires that LAFCOs identify and analyze water, wastewater, and fire protection services within DUCs as part of scheduled municipal service reviews (MSRs) and sphere of influence reviews. State law also places restrictions on annexations to cities if the proposed annexation is adjacent to a DUC.

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Alameda LAFCO encourages MTC and ABAG to consider including strategies that support the annexation of 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 the Plan Bay Area 2050 to LAFCOs and cities in order to push these annexations. Many LAFCOs within the Bay Area have limited budgets and staffing. Grant funding made available to LAFCOs and cities for annexation plans of unincorporated communities in or near PDAs, promotes better utilization of LAFCOs and cities' time to process annexations, create service plans, and provide outreach to residents about the benefits of annexations. The grants to support these annexations would have long-lasting benefits for residents, cities, and counties.

Another key highlight that should be considered in the Blueprint is the role that special districts play in providing municipal services. LAFCO regulates the boundaries and services provided by the independent and dependent special districts in Alameda County. Many of these special districts provide public services, such as water, wastewater, and fire protection services that are essential to the continued growth and protection of the Bay Area. Alameda LAFCO encourages MTC and ABAG to engage special districts throughout the Plan Bay Area 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 the special districts in our respective counties.

Alameda LAFCO thanks you for the opportunity to comment and looks forward to reviewing all future documents related to Plan Bay Area 2050.

Respectfully,



Rachel Jones
Executive Officer