



Lou Ann Teixeira  
 Executive Officer

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July 13, 2016  
 Agenda Item 13

July 13, 2016 (Agenda)

Contra Costa Local Agency Formation Commission  
 651 Pine Street, Sixth Floor  
 Martinez, CA 94553

**Plan Bay Area 2040**

Dear Members of the Commission:

The Association of Bay Area Governments (ABAG) and the Metropolitan Transportation Commission (MTC) are updating the Bay Area’s long-range transportation and housing plan, known as *Plan Bay Area 2040*.

*Plan Bay Area 2040* is an update to Plan Bay Area 2013, which includes the region’s Sustainable Communities Strategy (SCS). The plan is state-mandated and includes an integrated long-range transportation, land-use and housing components designed to support a growing economy, provide more housing and transportation choices, and reduce transportation-related pollution in the nine-county Bay Area.

Plan Bay Area 2013 grew out of “The California Sustainable Communities and Climate Protection Act of 2008” (Senate Bill 375), which requires each of the state’s 18 metropolitan areas — including the Bay Area — to develop a SCS — a new element of the regional transportation plan to reduce greenhouse gas emissions.

Within the Bay Area, state law gives joint responsibility for Plan Bay Area to ABAG and MTC. These two agencies are collaborating with the Bay Area Air Quality Management District (BAAQMD) and the Bay Conservation and Development Commission (BCDC) on the plan. They are also partnering with local communities, agencies and a wide range of stakeholders to ensure broad public input into Plan Bay Area’s preparation.

Plan Bay Area 2040 is currently a work in progress that will be updated every four years to reflect new priorities. ABAG and MTC kicked off their work in January 2015. In March-April, 2015, a series of open house meetings were held to provide the public with information about the plan and to solicit feedback. In September 2015, the ABAG and MTC Boards considered proposed Plan Bay Area 2040 goals and targets. In May-June 2016, a second series of public open houses was held to present “Alternative Scenarios” which show different options for how

the Bay Area can grow based on local land use development patterns and transportation investment strategies. These scenarios take into consideration jobs, housing, population, travel needs and funding for Transportation Improvements. Three scenarios were presented, each showing a different combination of housing development, commercial growth and transportation investments. The scenarios are summarized below:

- ❖ **Main Streets Scenario** places future population and employment growth in the downtowns in all Bay Area cities. This scenario would expand high-occupancy toll lanes and increase highway widenings. It would also assume some development on land that is currently undeveloped.
- ❖ **Connected Neighborhoods Scenario** places future population and employment growth in medium-sized cities and provides increased access to the region's major rail services, such as BART and Caltrain. It would place most of the growth in areas that cities determine as having room for growth, with some additional growth in the biggest cities. There would be no development on open spaces outside the urban footprint.
- ❖ **Big Cities Scenario** concentrates future population and employment growth within the Bay Area's three largest cities: San Jose, San Francisco and Oakland. Transportation investments would go to the transit and freeways serving these cities. There would be no development on open spaces outside the urban footprint.

Based on public input and feedback from local jurisdictions, a “preferred scenario” will be constructed from these three alternatives.

In July 2016, MTC and ABAG staff will present a summary of public comments from the May-June 2016 open houses to the MTC Planning and ABAG Administrative Committees. The draft preferred scenario will go through a series of committee reviews and refinement. In September 2016, ABAG and MTC will be asked to adopt the final preferred scenario at a joint meeting. All of this work, in turn, will form the foundation for Plan Bay Area 2040, to be adopted in summer 2017.

*So where does LAFCO fit in?* In 2010, the nine Bay Area LAFCO Executive Officers met with staff from ABAG, MTC, BAAQMD and BCDC to discuss development of the 2013 Bay Area Plan, and to provide initial input. At that time, we designated Mona Palacios, the Alameda LAFCO Executive Officer, as our LAFCO representative. Ms. Palacios has kept the Bay Area LAFCOs apprised of the major activities in developing the Bay Area plans.

Recently, Ms. Palacios advised the Bay Area LAFCOs of the Notice of Preparation (NOP) for the Draft Environmental Impact report (EIR) for Plan Bay Area 2040 (Attachment 1). Ms. Palacios also provided the Bay Area LAFCOs with a copy of her comment letter ( Attachment 2). Your Executive Officer also submitted a comment letter (Attachment 3) supporting the major points made by Ms. Palacios, and including additional comments encouraging ABAG and MTC to incorporate into Plan Bay Area 2040 the significance of established spheres of influence

(SOIs) for each city and special district, and the role of special districts as critical service providers. LAFCO staff will continue to following the development of Plan Bay Area 2040.

*This is an informational item; no action by the Commission is required.*

Sincerely,

LOU ANN TEXEIRA  
EXECUTIVE OFFICER

Attachment 1 – NOP for Draft EIR - Plan Bay Area 2040

Attachment 2 – Alameda LAFCO Comment (NOP DEIR - Plan Bay Area 2040)

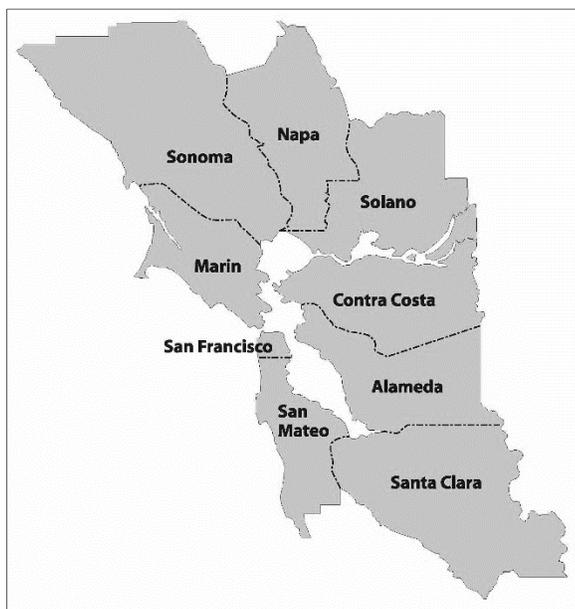
Attachment 3 – Contra Costa Comment Letter (NOP-EIR - Plan Bay Area 2040)



**NOTICE OF PREPARATION**  
**Metropolitan Transportation Commission**  
**San Francisco Bay Area Regional Transportation Plan /**  
**Sustainable Communities Strategy**  
**Environmental Impact Report**

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To: Interested Agencies, Organizations and Individuals  
 Project: **Draft Environmental Impact Report for Plan Bay Area 2040 – the Regional Transportation Plan (RTP) / Sustainable Communities Strategy (SCS)**  
 Lead Agency: Metropolitan Transportation Commission  
 Comment Period May 16, 2015 – June 15, 2016 (30-days)



**Figure 1. Nine-County San Francisco Bay Area**

Interested agencies, organizations and individuals are invited by the Metropolitan Transportation Commission (MTC) and the Association of Bay Area Governments (ABAG) to comment on the scope and content of the environmental impact assessment that will be conducted for the update of *Plan Bay Area*, an integrated land use and transportation plan looking out to the year 2040 for the nine-county San Francisco Bay Area. A map of the area is included in this notice as Figure 1.

MTC is the lead agency undertaking preparation of a program-level Draft Environmental Impact Report (DEIR) for Plan Bay Area 2040. Plan Bay Area 2040 (or “the Plan”) is the update of the area Regional Transportation Plan / Sustainable Communities Strategy (RTP/SCS), a long-range plan that balances future mobility and housing needs with other economic, environmental, and public health goals. It identifies regional transportation planning needs, priorities and

funding, and allows project sponsors to qualify for federal funding for public transit, streets and roads and bicycle and pedestrian facilities. The Plan must demonstrate achievement of a region’s share of state greenhouse gas emission reduction goals and is required to be updated every four years. Attachment A to this NOP provides more information on MTC, SB 375, Plan Bay Area 2040 and alternative plan scenarios.

In accordance with the California Environmental Quality Act (CEQA) Guidelines (Section 15082), the purpose of this Notice of Preparation is to seek comments about the scope and comment of the environmental impact assessment that will be conducted for this update of the Plan. If you represent an agency that may rely upon the EIR for project approval and/or tiering, MTC and ABAG are particularly interested in what information may be helpful for these purposes. Input is also sought from organizations and individuals as to the issues that should be addressed in the EIR.

Adoption and implementation of the Plan has the potential to result in environmental effects in all of the environmental impact areas identified in CEQA. For this reason, the Plan Bay Area 2040 EIR will be a “full scope” document and will analyze all of the required CEQA environmental issue areas. These include: aesthetics and visual resources; agriculture and forestry resources; air quality (including toxic air contaminants); biological resources; cultural resources; geology, seismicity, soils, and mineral resources; energy consumption; greenhouse gas emissions and climate change (including sea level rise); hazards and hazardous materials; hydrology and water quality; land use and planning; noise and vibration; population and housing; public services and recreation; transportation; utilities and other service systems. The EIR will also address cumulative effects, growth inducing impacts and other issues required by CEQA.

All interested agencies, organizations and individuals are welcome to submit comments and/or participate in the scoping meetings for the Draft EIR. Oral comments will be accepted during three regional scoping meetings:

**Thursday, May 26, 2016**

**11:00 a.m. to 1 p.m.**

Dr. Martin Luther King Jr. Library  
One Washington Square, Room 225  
San Jose, California

**Tuesday, May 31, 2016**

**6:30 p.m. to 8:30 p.m.**

MetroCenter Auditorium  
101 8<sup>th</sup> Street  
Oakland, California

**Thursday, June 2, 2016**

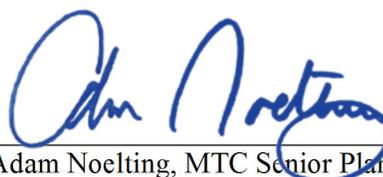
**11:00 a.m. to 1 p.m.**

Finley Community Center  
2060 W. College Avenue  
Santa Rosa, California

Written comments will be accepted at the scoping meetings; via mail to MTC Public Information, 375 Beale Street, Suite 800, San Francisco, CA, 94105; via fax to 510.817.5848 before May 19 (beginning May 23, send fax to 415.536.9800); or via email to [eircomments@mtc.ca.gov](mailto:eircomments@mtc.ca.gov). **Written comments must be received at the MTC offices no later than June 15, 2016.** For more information, call the MTC Public Information Office at 510.817.5757 before May 19 (beginning May 23, call 415.778.6757). Note: MTC and ABAG will have new phone numbers beginning May 23.

Do you need written materials in large type or in Braille to participate in MTC or BATA meetings? Do you need a sign language interpreter or other assistance? Is English your second language? Do you need one of our documents translated? Do you need an interpreter who speaks your language present at one of our meetings?

We can help! You can request assistance by calling 510.817.5757 before May 19 (call 415.778.6757 beginning May 23) or 510.817.5769 for TDD/TTY before May 19 (the TDD/TTY number is 415.778.6769 beginning May 23). Visit [www.mtc.ca.gov](http://www.mtc.ca.gov) for more information. We require at least three days’ notice to provide reasonable accommodations. We prefer more notice if possible. We will make every effort to arrange for assistance as soon as possible.



Adam Noelting, MTC Senior Planner  
Plan Bay Area 2040 Project Manager

5/16/2016

Date

**NOTICE OF PREPARATION**  
**Metropolitan Transportation Commission**  
**San Francisco Bay Area Regional Transportation Plan /**  
**Sustainable Communities Strategy**  
**Environmental Impact Report**  
**ATTACHMENT A**

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**Background**

The Metropolitan Transportation Commission (MTC) is the transportation planning, coordinating and financing agency for the nine-county San Francisco Bay Area (which includes Alameda, Contra Costa, Marin, Napa, San Francisco, San Mateo, Santa Clara, Solano and Sonoma Counties). Created by the State Legislature in 1970, MTC functions as both the regional transportation planning agency (RTPA) which is a state designation, and as the region's metropolitan planning organization (MPO) which is a federal designation. As required by State legislation (Government Code Section 65080 et. seq.) and by federal regulation (Title 23 USC Section 134), MTC is responsible for preparing the Regional Transportation Plan (RTP) for the San Francisco Bay Area Region. An RTP is a long-range plan that identifies the strategies and investments to maintain, manage, and improve the region's transportation network.

A Sustainable Communities Strategy (SCS) is a required element of the RTP under California's Sustainable Communities and Climate Protection Act, also known as Sen. Bill 375 (Stats. 2008, ch. 728) (SB 375). While other efforts to reduce greenhouse gas (GHG) emissions focus on alternative fuels and vehicle efficiency, SB 375 is intended to more effectively reduce emissions by integrating land use and transportation planning to reduce overall passenger vehicle miles traveled. Through the development of a SCS, that accompanies the RTP, policies and strategies will be identified to reduce per capita passenger vehicle-generated GHG emissions. The SCS will identify the general location of land uses, residential densities, and building intensities within the region; identify areas within the region sufficient to house all the population of the region; identify areas within the region sufficient to house an 8-year projection of the regional housing need; identify a transportation network to serve the regional transportation needs; gather and consider the best practically available scientific information regarding resources areas and farmland in the region; consider the state housing goals; set forth a forecasted development pattern for the region; and allow the regional transportation plan to comply with the federal Clean Air Act. (Gov. Code, § 65080, subd. (b)(F)(2)(B)) If the SCS for the RTP update does not achieve the GHG emission targets set by the California Air Resources Board (CARB), an Alternative Planning Strategy (APS) must be developed to demonstrate how the targets could be achieved.

The San Francisco Bay Area's RTP/SCS sets policies to guide transportation decisions and proposes a program of capital, operational, and management improvements needed through the year 2040. In addition, if the SCS achieves its GHG emission target and the CARB accepts a determination by MTC that the SCS, if implemented, would achieve its GHG emissions target, certain land development projects may be eligible for CEQA streamlining if they are consistent with the general use, density, intensity and applicable policies of the adopted SCS.

**Plan Bay Area 2040**

Plan Bay Area 2040 is the update of the region's first RTP/SCS, *Plan Bay Area*, and is a joint effort led by MTC and ABAG and developed in partnership with the Bay Area's other two regional government agencies, the Bay Area Air Quality Management District (BAAQMD), and the Bay Conservation and

Development Commission (BCDC). Plan Bay Area 2040 strives to meet the requirements of SB 375 by developing an integrated RTP/SCS plan and strives to attain the per-capita GHG emission reduction targets of -7 percent by year 2020 and -15 percent by year 2035 from 2005 levels.

Plan Bay Area 2040 will reinforce land use and transportation integration per SB 375 and present a vision of what the Bay Area's land use patterns and transportation networks might look like in 2040. Goals of Plan Bay Area 2040 include:

- Climate Protection
- Open Space & Agricultural Preservation
- Transportation System Effectiveness
- Adequate Housing
- Healthy and Safe Communities
- Equitable Access
- Economic Vitality

Plan Bay Area 2040 forecasts the Bay Area to add over 2.4 million people, 1.3 million new jobs and 823,000 new housing units between 2010 and 2040. To plan for this future growth and meet the targets set forth in SB 375, Plan Bay Area 2040 builds on local and regional planning efforts by using a framework of 188 locally-adopted Priority Development Areas (PDAs) and 165 Priority Conservation Areas (PCAs) in the nine-county Bay Area. PDAs are areas where amenities and services can be developed to meet the day-to-day needs of residents in a pedestrian-friendly environment served by transit. Plan Bay Area 2040 strives to help PDAs become "Complete Communities," based in large part on local aspirations and community context. PCAs are areas of regional significance that have broad community support and are in need of protection. They provide important agricultural, natural resource, scenic, cultural, recreational, and/or ecological values, and ecosystem functions.

Plan Bay Area 2040 also includes a financially constrained transportation investment plan as required by state and federal planning regulations. It includes transportation projects and programs that would be funded through existing and future revenues that are projected to be reasonably available to the region over the 24-year horizon of the plan to support the adopted growth pattern. A total of \$299 billion in revenues is available for the financially constrained Plan Bay Area 2040.

For more information about Plan Bay Area 2040, visit: <http://planbayarea.org/plan-bay-area.html>.

### **Scenarios to be Analyzed**

MTC and ABAG have developed three land use and transportation scenarios, described below, to illustrate the effects that different housing, land use and transportation strategies have on the region's adopted goals and performance targets. MTC and ABAG will evaluate the three scenarios, and one or a combination of them will be identified as the preferred plan, which will be analyzed as the project in the EIR. The remaining scenarios may be analyzed as alternatives in the EIR.

Each scenario uses the same regional growth control totals of 2.4 million new people, 1.3 million new jobs and 823,000 new housing units, along with the same discretionary transportation revenues to support the growth.

### **Main Streets Scenario**

The Main Streets Scenario targets expected growth in people and jobs in the downtowns of every Bay Area city. This scenario most closely resembles traditional suburban growth, with more growth in areas that are presently undeveloped. Of the three scenarios, this scenario expects the smallest share of

housing growth to occur in PDAs (54%); comparable to the other scenarios, expects the smallest share of new housing to occur in the three big cities of San Jose, San Francisco and Oakland (43%); expects a similar share as with the Connected Neighborhoods scenario of new housing in Bayside communities (21%); the largest share of new housing is distributed in Inland, Coastal, Delta communities (35%) in comparison to the other scenarios. Specific land use strategies include upzoning of select suburban areas to increase residential and commercial development capacity; allowing urban growth boundaries to expand faster than expected compared to past trends; reducing parking minimums in PDAs along regional rail transit; and encouraging affordable housing through inclusionary zoning, fees on commercial development and other tax policies.

This scenario calls for an expansion of high-occupancy toll lanes, with pricing based on level of congestion, and highway widenings to manage the increased number of cars. Of the three scenarios, this scenario invests the largest share of discretionary revenues towards maintaining and operating the existing system (53%), followed by investments in major projects (24%) and system enhancements (23%). Specific strategies to support the growth pattern include strategic transit investments, especially bus improvements, to provide access to increasingly dispersed job centers; technological advances to use roadway capacity more efficiently, while emphasizing freeway-focused pricing like Express Lanes / Managed Lanes as complementary strategies; strategic highway capacity increases; investment into both state of good repair (particularly for highways and local streets across all nine counties); and technological advancements (e.g. clean vehicles) and incentive programs to encourage travel options that help meet GHG emissions reduction targets.

### **Connected Neighborhoods Scenario**

The Connected Neighborhoods Scenario emphasizes expected growth in people and jobs in areas near major transit corridors prioritized by cities as being the best places for new development. Of the three scenarios, this scenario expects the largest share of housing growth to occur in PDAs (69%); expects a similar share as the Main Streets Scenario of new housing to occur in the three big cities of San Jose, San Francisco and Oakland (44%); expects a more modest share of new housing in Bayside communities (22%); with the largest share of new housing in Inland, Coastal, Delta communities (35%). Specific land use strategies include encouraging new housing development by increasing residential development capacity in PDAs based on locally identified PDA place type; raising caps on office development in San Francisco; avoiding development on adopted PCAs and accommodating all new growth within existing urban growth boundaries or urban limit lines, using city boundaries as a limit when a jurisdiction has no expansion limit; reducing parking minimums in PDAs with high levels of transit access along El Camino Real and East Bay corridors; and encouraging affordable housing through inclusionary zoning.

Expansion of roadways would be limited, with more focus on modernizing and expanding our transit system. Investments in bicycle and pedestrian infrastructure would help create more walkable and bikeable downtowns. Compared to the Main Streets Scenario, this scenario invests a smaller share of discretionary revenues towards maintaining and operating the existing system (46%), but invests more towards major projects (31%) and the same share toward system enhancements (23%). Specific strategies to support the growth pattern include strategic transit efficiency investments to improve frequencies and reduce travel times on core transit lines across the region; a limited set of high performing highway efficiency investments, including strategic highway capacity improvements to address bottlenecks and provide reliever routes to freeways within the urban core; the most cost-effective transit expansion projects that support the region's highest-growth PDAs; state of good repair needs with expansion and efficiency priorities for all modes; identify opportunities to align state of good repair to support PDA growth by repaving streets and upgrading buses that serve these communities;

and technological advancements (e.g. clean vehicles) and incentive programs to encourage travel options that help meet GHG emissions reduction targets.

### **Big Cities Scenario**

The Big Cities Scenario concentrates expected growth in the Bay Area's three largest cities: San Jose, San Francisco and Oakland. Neighboring towns already well connected to these cities would also see growth, particularly in areas that cities have prioritized for development. Of the three scenarios, this scenario expects a similar share of housing growth as the Main Streets Scenario to occur in PDAs (55%); expects the highest share of new housing to occur in the three big cities of San Jose, San Francisco and Oakland (72%); expects a smaller share of new housing in Bayside communities (17%); and the smallest share of new housing in Inland, Coastal, Delta communities (11%). Specific land use strategies include increasing development capacity in areas with high transit access by increasing residential densities in key PDAs, TPAs and select opportunity sites; eliminating caps on office development in San Francisco; avoiding development on adopted PCAs and accommodating all new growth within existing urban growth boundaries or urban limit lines, using city boundaries as a limit when a jurisdiction has no expansion limit; reducing parking minimums in three big cities and neighboring communities; encouraging more affordable housing through inclusionary zoning, fees on residential development and other tax policy.

City streets, bike lanes, rail lines and other transportation infrastructure serving the region's core will be repaired, maintained, and expanded to meet increased demand. Compared to the previous two scenarios, this scenario invests the smallest share of discretionary revenues towards maintaining and operating the existing system (39%), and invests the largest share towards major projects (38%) and the same share toward system enhancements (23%). Specific strategies to support the growth pattern include expansion of the South Bay transit system to support high-density development across Silicon Valley, while at the same time prioritizing investment in core capacity projects in San Francisco and Oakland to enable high-density development; link regional rail systems into the heart of the Bay Area's two largest cities – San Francisco and San Jose – while boosting service frequencies to support increasingly-urban commute patterns; state of good repair needs with expansion and efficiency priorities for all modes; support urban development in San Francisco by implementing cordon pricing and leveraging motorists' tolls to pay for robust and time-competitive transit services; align operating and maintenance funds to prioritize investments into high-growth cities and high-ridership systems; and technological advancements (e.g. clean vehicles) and incentive programs to encourage travel options that help meet GHG emissions reduction targets.

*Alameda***LAFCO**

ALAMEDA LOCAL AGENCY FORMATION COMMISSION  
 1221 OAK STREET, SUITE 555 \* OAKLAND, CA 94612  
 (510) 271-5142 FAX (510) 272-3784  
[WWW.ACGOV.ORG/LAFCO](http://WWW.ACGOV.ORG/LAFCO)

**Members**

**Ayn Wieskamp**, Vice Chair  
 Special District Member

**Nate Miley**  
 County Member

**John Marchand**, Chair  
 City Member

**Sblend Sblendorio**  
 Public Member

**Ralph Johnson**  
 Special District Member

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**Alternates**

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 Special District Member

**Wilma Chan**  
 County Member

**David Haubert**  
 City Member

**Tom Pico**  
 Public Member

**Executive Officer**

Mona Palacios

June 10, 2016

MTC Public Information  
 375 Beale Street, Suite 800  
 San Francisco, CA, 94105

Sent via email to [eircomments@mtc.ca.gov](mailto:eircomments@mtc.ca.gov)

Dear MTC Public Information Officer:

Thank you for including the Alameda Local Agency Formation Commission (Alameda LAFCo) in the distribution of the Notice of Preparation (NOP), informing us that an Environmental Impact Report (EIR) is being prepared for the update to the regional planning document, *Plan Bay Area 2040*.

LAFCos are independent agencies with discretion to approve or disapprove, with or without amendment, wholly, partially or conditionally, changes of organization or reorganization of cities or special districts. LAFCos are required to consider a variety of factors when evaluating a matter or project that comes before it for approval, including, but not limited to the proposed project's potential impacts on agricultural land and open space and the provision of public services, including the timely and available supply of water, adequate and proximate affordable housing, and other factors.

Many of the matters that require action by LAFCo are considered "projects" under CEQA, and therefore, as a Responsible Agency, LAFCo, or applicants seeking approval from LAFCo for some form of boundary change, may need to rely on or tier from the *Plan Bay Area 2040 EIR* to facilitate the environmental review and documentation process of the proposed project.

The NOP states that "adoption and implementation of the Plan has the potential to result in environmental effects in all of the environmental impact areas identified in CEQA." The two environmental topics of greatest interest and relevance to the decisions with which LAFCos are confronted are impacts on agricultural lands and open space, and issues related to the adequacy and efficiency of public services.

In light of this, we would request that as the potential impacts of the Plan are identified and evaluated in the EIR, particularly with reference to proposed Priority Development Areas (PDAs), the EIR should give particular attention to impacts involving the loss of agricultural land and to the availability and capacity of public services. With regard to agricultural land issues, the EIR should address the impacts to the PDA site as well as surrounding areas and should include a productivity analysis.

With regard to the public services needed to support each proposed PDA, the EIR should evaluate the level and availability of the following:

- Domestic potable water resources to support the potential future growth in the PDAs;
- Wastewater collection and treatment infrastructure;
- Flood control and stormwater management systems;
- Fire protection services and ability to expand to meet the needs of growth within a PDA;
- Police and other law enforcement services;
- Emergency medical, healthcare, vector control and mosquito abatement services;
- Local transportation, road maintenance and street lighting systems;
- Open space and parks and recreation facilities and services;
- Solid waste collection and disposal systems;
- Electricity and other sources of energy;
- Animal control;
- Library services, and
- Broadband and related internet services.

Sources of information that would likely facilitate the requested evaluation of public services should include data from the most recent Municipal Service Reviews (MSRs) that are prepared periodically by the LAFCo in each of the Bay Area Counties in which PDAs are proposed. We encourage the EIR preparers to avail themselves of this rich data source as a way of presenting to the public an assessment of the degree to which necessary public services are available, or would likely become available, in support of the anticipated growth embodied in the *Plan Bay Area 2040* and specifically within the PDAs. Further, from the consideration of impacts to public services on PDAs distributed throughout the Bay Area, it is hoped that a picture would emerge indicating to the public a sort of 'report card' or overall assessment of where the Bay Area can feasibly rise to the new level of needs of public services and where the Bay Area, as a whole, is seen as deficient or lacking, or facing potentially serious constraints. We think the EIR for the Plan Bay Area 2040 presents an ideal opportunity to heighten the public's awareness of potential impacts in these critical topic areas.

Thank you for considering our comments.

Sincerely,



Mona Palacios

Executive Officer

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cc: Each Commissioner, Alameda LAFCo  
Each Executive Officer, Bay Area LAFCos (Contra Costa, Marin, Napa, San Francisco, San Mateo, Santa Clara, Solano, Sonoma)  
Andrew Massey, Alameda LAFCo Legal Counsel  
Nat Taylor, Alameda LAFCo Planning Consultant

CONTRA COSTA LOCAL AGENCY FORMATION COMMISSION  
 651 Pine Street, Sixth Floor • Martinez, CA 94553-1229  
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Lou Ann Teixeira  
 Executive Officer

## MEMBERS

Donald A. Blubaugh <i>Public Member</i>	Mary N. Piepho <i>County Member</i>
Federal Glover <i>County Member</i>	Rob Schroder <i>City Member</i>
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June 15, 2016

MTC Public Information  
 375 Beale Street, Suite 800  
 San Francisco, CA, 94105

Sent via email to [eircomments@mtc.ca.gov](mailto:eircomments@mtc.ca.gov)

Dear MTC:

Thank you for the opportunity to comment on the Notice of Preparation (NOP) relating to an Environmental Impact Report (EIR) being prepared for the update to the regional planning document, *Plan Bay Area 2040*.

We would like to echo the comments submitted by Alameda LAFCO regarding LAFCO's mission, role and responsibilities. LAFCO is charged with balancing the competing interests of preserving agricultural and open space lands, while encouraging orderly growth and development and the efficient extension of public services. As noted by Alameda LAFCO, we request that the EIR consider impacts to agricultural and open space lands, as well as the availability and capacity of public services.

With regard to agricultural and open space land issues, the EIR should address potential impacts to the Priority Conservation Area (PCA) sites as well as surrounding areas.

With regard to the public services needed to support each proposed Priority Development Area (PDA), the EIR should evaluate the level and availability of those services identified in the Alameda LAFCO letter.

You may recall that 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*.

As discussed in 2010, the *Plan Bay Area* documents should take into consideration the LAFCO established spheres of influence (SOIs) for each city and special district, as the SOIs establish the areas designated as probable physical boundaries and future service areas. Further, the *Plan Bay Area* documents should recognize special districts as critical service providers. In many counties, including Contra Costa County, most infrastructure services (i.e., fire, sewer, water) are provided by special districts. *Plan Bay Area 2040* would be incomplete if it fails to consider SOIs, as well as the role of special districts as critical service providers.

As noted by Alameda LAFCO, Municipal Service Reviews (MSRs), as prepared by LAFCOs, contain a wealth of information regarding municipal services. The 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 disadvantaged unincorporated communities; and any other matters related to effective or efficient service.

We agree with Alameda LAFCO that the EIR for *Plan Bay Area 2040* presents a valuable opportunity to heighten the public's awareness of these critical issues.

Thank you for your consideration of these comments, and please include Contra Costa LAFCO on your future mailing list.

Sincerely,



Lou Ann Texeira  
Executive Officer

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