



ASSOCIATION
OF BAY AREA
GOVERNMENTS

Bay Area Metro Center
375 Beale Street, Suite 700
San Francisco, CA 94105
415.820.7900
www.abag.ca.gov

November 9, 2021

Jesse Arreguin, President
Mayor, City of Berkeley

Belia Ramos, Vice President
Supervisor, Napa County

David Rabbit
Immediate Past President
Supervisor, Sonoma County

Karen Mitchoff
Chair, Regional
Planning Committee
Supervisor, Contra Costa County

Jesse Arreguin
Chair, Legislation Committee
Mayor, City of Berkeley

Karen Mitchoff,
Chair, Finance Committee
Supervisor, Contra Costa County

Susan Candell, Mayor
City of Lafayette
3675 Mount Diablo Boulevard, Suite 210
Lafayette, CA 94549

RE: City of Lafayette Letter Regarding Objection to the Use of Errata to Change Policy

Dear Mayor Candell and City Councilmembers:

On behalf of the MTC Commissioners, ABAG Executive Board members and staff, thank you for your partnership throughout the Regional Housing Needs Allocation (RHNA) process and for your comment on the use of errata in the Plan Bay Area 2050 process.

The City of Lafayette's letter raises an issue with the documentation of *Strategy H8: Accelerate Reuse of Public and Community-Owned Land for Mixed-Income Housing and Essential Services*. Contrary to the statement by the City, the change listed in the "Errata" document did not alter how this strategy was applied in Plan Bay Area 2050. The correction in the erratum was made to align the description of the strategy in one of the Plan's supplemental reports with the language already adopted by the MTC Commission and ABAG Executive Board in September 2020 and January 2021.

The intent of the Draft Plan Bay Area 2050 errata document was to increase transparency by highlighting errors in the Draft Plan Bay Area 2050 plan document and supplemental reports at the time they were identified, which were then corrected in the Final Plan Bay Area 2050 plan document and supplemental reports. All items included in the errata document were technical corrections to amend errors in the draft documentation.

The *Draft Plan Bay Area 2050 Forecasting and Modeling Report* originally included an error stating that all public and community-owned lands identified as places for accelerated reuse were located within Plan Bay Area 2050 Growth Geographies. The language included in the modeling report was not consistent with the strategy description adopted by the MTC Commission and ABAG Executive Board, which defined the strategy as:

"Establish a regional network of land owned by public agencies, community land trusts, and other non-profit land owners and coordinate its reuse as deed-restricted mixed-income affordable housing, essential services, and public spaces. Align with the *Build Adequate Affordable Housing to Ensure Homes for All* and *Provide Targeted Mortgage, Rental, and Small Business Assistance* strategies to match sites

with funding, developers, and service providers, and to ensure projects benefit communities of color and other historically disinvested communities.”¹

As shown here, the strategy description presented to and adopted by the MTC Commission and ABAG Executive Board did not include any reference to constraining public and community-owned land within the boundaries of the Growth Geographies.

The City’s letter correctly summarizes that unmitigated Very High Fire Hazard Severity Zones are excluded from the Growth Geographies. However, it is important to distinguish between Growth Geographies and the sites included in the public lands strategy (Strategy H8). Growth Geographies are areas used to shape future housing and job growth in some Plan Bay Area 2050 strategies such as *H3: Allow a Greater Mix of Housing Densities and Types in Growth Geographies* and *EC4: Allow Greater Commercial Densities in Growth Geographies*. However, Growth Geographies do not represent all areas envisioned for future growth. Public and community-owned lands such as the Lafayette BART station parking lot encompass a separate set of places that are envisioned for growth in Strategy H8. Although many of these sites are within Growth Geographies, the description of the strategy adopted by MTC and ABAG shows that application of Strategy H8 is not limited to only those sites within Growth Geographies.

Thus, the preliminary decision made by the ABAG Administrative Committee on the City of Lafayette’s RHNA appeal is consistent with the Plan Bay Area 2050 strategies adopted by ABAG and MTC.

Once again, we appreciate the City of Lafayette’s engagement throughout the RHNA and Plan Bay Area 2050 processes.

Sincerely,



Therese W. McMillan
Executive Director

TWM: GA

J:\COMMITTEE\ABAG Administrative\Agendas\2021\AC 20211112 RHNA
Action\ABAG_Response_Lafayette_RHNA_Appeal_Comment_101521.docx

¹ See Updated Attachment I – Plan Bay Area 2050 Final Blueprint: Strategy Descriptions. Adopted by the ABAG Executive Board under Resolution No. 16-2020 and by the Metropolitan Transportation Commission under Resolution No. 4437.
<https://mtc.legistar.com/LegislationDetail.aspx?ID=4633798&GUID=F91D833F-21F5-400B-895E-815F1B05D0C8>