

July 17, 2013

Dear Mayor Anderson,

Thank you for your continued interest in Plan Bay Area. We received your additional comment letter on July 15, 2013, seeking clarification regarding three issues. Please see the responses below.

- 1) Priority Development Area (PDA) Place Type and Requested Changes to Growth Allocation: As noted in your July 15th letter, the Final EIR responses include a revision to the Place Type for the downtown Lafayette PDA. See response to comment A7-2 included in the Final EIR and copied below:

The City of Lafayette (City) has requested that its Priority Development Area (PDA) be reclassified from the “Transit Town Center” Place Type designation to a “Transit Neighborhood” Place Type, as identified in MTC’s Station Area Planning Manual (see http://www.bayareavision.org/pdaapplication/Station_Area_Planning_Manual_Nov07.pdf). The Place Type designation for PDAs is locally-selected and is intended to help local jurisdiction community members and decision-makers plan for the scale and character of growth they envision for their city’s PDAs. As such, jurisdictions may request a change to their PDA Place Types at any time and the modification requires only ABAG staff review. ABAG staff has reviewed this request and are currently processing the requested Place Type change for the City. It is important to note, however, that a future change in Place Type designation does not affect the housing or job distributions to the City or its PDA in the proposed Plan.

As noted in the response, the change in PDA Place Type does not result in a change in the overall growth allocation to Lafayette. PDA Place Type was not a factor used for assigning growth. Place Type **was** used as a check on growth assigned in ABAG’s distribution model, whereby any jurisdiction planning for growth in their PDA (“local growth”) exceeding the mid-point of the range of growth expected for that PDA place type was not assigned any additional growth per transit/VMT and other factors. In all other instances, place type was **not** used as a limiting factor, and in the case of Lafayette, the planned level of growth (local growth) does not exceed the mid-point of the Transit Neighborhood growth range. As such, the growth figure for Lafayette does not change with the place type modification. On May 16, 2013, the ABAG Executive Board approved the requested reduction in Lafayette’s RHNA allocation.

- 2) PDA boundaries: As noted in the response to comment A7-4, copied below, the ½ mile radius is a guideline (*italics added for emphasis*).

This comment relates to the description of Place Types for the region’s PDAs, as referenced in the proposed Plan. The Place Types provide general guidelines to local decision-makers and citizens when planning for growth in locations close to transit. *MTC and ABAG acknowledge that transit-accessible neighborhoods vary widely in terms of*

size, geography and other characteristics, and that the 1/2-mile radius around transit stations guideline utilized in the Place Type description may not be applicable to all transit locations throughout the region. As such, each city self-identifies and nominates its own PDAs, if it chooses, and identifies the specific boundaries of each. MTC and ABAG confirm that the Place Type guidelines, including the “1/2-mile radius” guideline, in no way supersede local jurisdictions’ identification of locations for growth, including the locally-defined boundaries for their PDAs, or zoning and other land use policies.

- 3) Jurisdictions retaining the right to require environmental analysis within PDAs: As noted in the response to comments A7-4 and A7-5, copied below, jurisdictions retain (*italics added for emphasis*) local land use control and discretion in determining the most appropriate manner for future local projects to comply with CEQA.

(A7-4) This comment also relates to the right of the City to conduct environmental review for projects in its PDA. *MTC and ABAG staffs confirm that the Plan Bay Area EIR does not usurp the local project environmental review process, pursuant to SB375. See Master Responses A.1 regarding local land use control and A.2 regarding further environmental review.*

(A7-5) *Plan Bay Area and this EIR do not take away a local jurisdiction’s right to assess the environmental impacts of future growth.* Rather, many environmental impacts are more appropriately assessed locally, at the project level, and this EIR identifies many impact areas where further review at the local level would likely be required. Moreover, while CEQA encourages lead agencies to use tiering and SB 375 streamlining to comply with CEQA where applicable, *lead agencies for future second-tier plans and project-specific development proposals will exercise their discretion in determining the most appropriate manner to comply with CEQA in considering future projects.* See Master Response A.1 for more information on local control over land use and A.2 regarding further environmental review.

Thank you again for your continued interest in Plan Bay Area.

Sincerely,



Miriam Chion, ABAG Planning Director