

The Board of Supervisors

County Administration Building
651 Pine Street, Room 106
Martinez, California 94553-1293

John Gioia, 1st District
Candace Andersen, 2nd District
Diane Burgis, 3rd District
Karen Mitchoff, 4th District
Federal D. Glover, 5th District

Contra Costa County



Monica Nino
Clerk of the Board
and
County Administrator
(925) 335-1900

April 26, 2022

The Honorable Richard Bloom
50th Assembly District
State Capitol
P.O. Box 942849
Sacramento, CA 94249-0050

AB 2295 (Bloom) Local educational agencies: housing development projects.
OPPOSE Unless Amended

Dear Assemblymember Bloom,

On behalf of the Contra Costa County Board of Supervisors, I am writing regarding the subject bill which would require that a housing development project be deemed an authorized use on any real property owned by a local educational agency (LEA) if it meets specified occupancy, affordability, and planning criteria. The Board is currently opposed to the bill unless it is amended consistent with revisions described below.

In its current state the bill conflicts with several significant policies, local and state. At the local level, Contra Costa and many other jurisdictions have enacted an Urban Limit Line (ULL), Urban Growth Boundary (UGB), or the equivalent. Contra Costa's ULL has been in place for over 30 years and has twice been reaffirmed by voters countywide. The line was placed strategically to delineate adequate developable land to accommodate growth *within* the ULL and preserve farmland and habitat *outside* the line. Our ULL policy includes a review requirement to ensure an adequate supply of developable land over time. Contra Costa's most recent review included representatives of the building industry who did not take issue with the ULL. The finding that there was an adequate supply of developable land was uncontested during the review process.

Further policy conflict can be found relative to the State's own greenhouse gas (GHG) reduction legislation (AB32 [2006], SB 375 [2008], SB 743 [2013]). Local jurisdictions faithfully responded to these legislative directives by implementing policy changes and modifying land development patterns to reduce GHGs. The subject bill would contradict this prior direction and upend recent gains.

California deserves a more coherent approach to land development regulations.

We support efforts to increase the housing supply and believe that school districts should have an enhanced ability to develop homes on their property so long as the land is **within** an urban limit line. The Board respectfully requests that the subject bill remove the exemptions established in AB 2295 for land *outside* an adopted ULL/UGB or the equivalent.

If you have any questions regarding this letter, please contact the County's legislative advocate, Jim Gross (JGross@nmgovlaw.com), or the County's Principal Planner, John Cunningham at john.cunningham@dcd.cccounty.us.

Sincerely,



Karen Mitchoff, Chair
Contra Costa County Board of Supervisors

cc:

Contra Costa County Legislative Delegation
John Kopchik, Conservation and Development
Lou Ann Texeira, Contra Costa LAFCO
John Hoang, Contra Costa Transportation Authority
Chris Lee, California State Association of Counties
Amanda Brown-Stevens, Greenbelt Alliance
Edward Sortwell Clement, Jr., Save Mount Diablo