Appendix H
90-Day Review and Revision Comments

Regional Housing Needs Determination
Association of Bay Area Governments

Jurisdiction Comments and Proposed Revisions

Action Recommended by ABAG Staff

ALAMEDA COUNTY

Alameda

ABAG staff conferred with City staff. Jurisdiction has proposed two revisions to the RHND allocation. An explanation of each is provided below.

Proposed Revision 1.

Jurisdiction seeks to reduce the City's job growth in the RHND methodology from 5,342 jobs to 2,150 jobs. The result of this modification would reduce the City's total RHND allocation by 882 units.

Proposed Revision 2.

The Jurisdiction also seeks to modify the City's income distribution categories by reducing the percentages for the Low, Moderate, and Above Moderate categories, and increase the percentage for the Very Low-income category.

The revision proposed by the City of Alameda is not supported by adequate documentation that explains how the proposed income distribution categories were derived.

Notes (Proposed Revision 1):

Because there can be no net reduction in the total housing needs allocation for the region, any proposed reduction in RHND allocations for one jurisdiction will impact the RHND allocations of another jurisdiction. In order to address this issue, and maintain the pattern of growth established in the RHND methodology and its subsequent allocations on a county by county basis, any reduction of RHND allocations would need to be maintained at the county level. Therefore, the reduction of 882 housing units from the City of Alameda's RHND allocation would be divided amongst the other jurisdictions within Alameda County.

Proposed Revision 1.

Option 1- Deny the proposed revision. ABAG staff believes that the housing market is extremely tight in Alameda, as well as adjacent communities. With each increase in jobs, the City of Alameda should be responsible for creating additional housing.

Option 2- Accept the proposed revision, and modify the RHND allocations. The City of Alameda is unique among Bay Area cities in that it currently has substantially fewer jobs than in 1990. The closure of the military base caused a loss of approximately 14,000 military and civilian jobs. Of this total approximately 9,701 jobs were civilian personnel. Assuming that the civilian personnel were living in the City of Alameda, the City believes that they have suffered a significant adjustment to their jobs/housing balance. An evaluation of jobs/housing balance for City of Alameda 1999 shows that there are .90 jobs for each household, with the ABAG region averaging 1.42 jobs per household.

In order to address this issue, and adjust the RHND allocations for the City of Alameda, it would be necessary to exclude the military jobs in 1990 which were held by Navy personnel living in group quarters because the jobs and housing went hand-in-hand in this case. Based on Projections 2000 and discussions with staff from the City of Alameda, it is estimated that the jobs lost during the 1990s will be recovered over a period of approximately 15 years.

If the Executive Board chooses to adopt this proposed revision, the job growth of the City of Alameda could be reduced from 5,342 to 2,150 jobs. This would reduce the City of Alameda's RHND allocation to 1,280 units, a reduction of 882 units. The reduction of 882 housing units from the City of Alameda's RHND allocation would be divided amongst the other jurisdictions within the county.

Proposed Revision 2.

Staff recommends that the Executive Board deny the proposed revision. The revision criteria cited by the City of Alameda does not meet the defined by California State Housing Element Law, which would warrant a revision. Any proposed revision must be based upon available and replicable data, as well as the same accepted planning methodology which determined the original RHND allocation assignment.

Jurisdiction Comments and Proposed Revisions	Action Recommended by ABAG Staff
ALAMEDA COUNTY (CONTINUED)	
Albany	
ABAG staff conferred with City staff; no revision proposed.	**No action necessary.**
Berkeley	
ABAG staff conferred with City staff; no revision proposed.	**No action necessary.** The City of Berkeley has reviewed the RHND allocations assigned by ABAG and accepts the planning responsibility. The City plans to work vigorously to meet the targeted demand in the years ahead. The City of Berkeley stated that the production target for lower income units was slightly lower than the City is currently planning for during the 1999-2006 time frame.
Dublin	
ABAG Staff conferred with City staff. Jurisdiction seeks to reduce the City's RHND allocation assignment of 5,436 units to 3,672 units over the 1999-2006 RHND time frame (a reduction of 1,784 units). Proposed revision is based upon historical growth trends and possible environmental constraints which may impede the development of the assigned RHND allocation by ABAG.	**Staff recommends that the Executive Board deny the proposed revision.** Proposed revision does not reflect the criteria of State Housing Element Law which would warrant a revision. The proposed revision cites historical growth trends and environmental constraints as two factors warranting a revision. However, these two factors are not recognized by the statute as determinants for granting a revision.
Emeryville	
ABAG staff conferred with City staff; no revision proposed.	**No action necessary.**
Hayward	
ABAG staff conferred with City staff; no revision proposed.	**No action necessary.** The City of Hayward raised several concerns related to the Sphere of Influence allocation, the Jobs/ housing ratio, and the income category distribution of the RHND allocation. The City requested that ABAG revisit the RHND methodology to address their concerns, however no specific revisions were proposed for the City's RHND allocation assignment.
Fremont	
No comments or proposed revisions submitted.	**No action necessary.**

Jurisdiction Comments and Proposed Revisions	Action Recommended by ABAG Staff
ALAMEDA COUNTY (CONTINUED)	
Livermore	
ABAG staff conferred with City staff; no revision proposed.	**No action necessary.**
Newark	
ABAG staff conferred with City staff; no revision submitted.	**No action necessary.** The City of Newark has reviewed the RHND allocation assigned by ABAG and finds the total housing units assigned unacceptable due to limited available land and environmental constraints which limit the density of new residential development. The City requests that ABAG revisit the RHND methodology in order to address their specific concerns, however the City has not proposed any specific revisions to its RHND allocations.
Oakland	
ABAG staff conferred with City staff; no revision proposed.	**No action necessary** The jurisdiction provided several general comments relating to the concentration of affordable housing units for some cities in the region, and the need to allocate more affordable units to jurisdictions with percentages of affordable housing that fall below the regional average of the very low and low income categories. Comments were also made suggesting that the process consider historic development patterns and the current jobs/housing balance of jurisdictions.
Piedmont	
ABAG staff conferred with City staff. Jurisdiction seeks to reduce the City's job growth in the RHND methodology by excluding home occupation jobs which do not require additional housing units. This modification would have the effect of reducing the City's RHND allocation by an undetermined number of units. The proposed revision is not supported by adequate documentation that explains how the modification would effect the RHND allocation assignment.	**Staff recommends that the Executive Board deny the proposed revision.** ABAG's forecast process includes self-employed workers in the total jobs for Projections 2000. An indistinguishable number of these workers maintain residency in the same place as they operate a business (home occupation jobs). Because ABAG's forecast process has no way of excluding home occupation jobs from the total jobs utilized in the RHND methodology, it is not possible to exclude these jobs from the job growth for the City of Piedmont. Therefore a revision of this type cannot be accommodated. It is important to note that this evaluation is applied to all jurisdictions in the region.

Jurisdiction Comments and Proposed Revisions	Action Recommended by ABAG Staff
ALAMEDA COUNTY (CONTINUED)	
Pleasanton	
ABAG staff conferred with City staff. Jurisdiction seeks to reduce the City's RHND allocation by 2,272 units based upon overstatements of growth in the Bay Area, lack of adequate infrastructure and public facilities, and the sub-region's non-attainment rating for air quality. The Jurisdiction also seeks to modify the income distribution by reducing the distribution of units in the very low, low and moderate categories, and increasing the units in the Above Moderate income category. The proposed income distribution numbers and percentage of allocation are as follows: Very Low & Low - 418 (15%), Moderate - 557(20%), and Above Moderate - 1,812(65%). The proposed revision is not supported by adequate documentation that explains how the proposed RHND allocation was derived.	**Staff recommends that the Executive Board deny the proposed revision.** The revision criteria cited by the City of Pleasanton does not meet the requirements for a revision as defined by State Housing Element Law. Any proposed revision must be based upon available data, and the same accepted planning methodology which determined the RHND allocation assignment. Proposed revisions must also consider the overall RHND allocations assigned to the region by the Department of Housing and Community Development (HCD).
San Leandro	
ABAG staff conferred with City staff; no revision proposed.	**No action necessary.** The City of San Leandro finds the RHND allocations assigned by ABAG acceptable. The City felt that the RHND allocations consider the City's built-out conditions and recognizes that in-fill potential is the only avenue that can be pursued to meet the RHND production targets.
Union City	
ABAG staff conferred with City staff; no revision proposed.	**No action necessary.**

Jurisdiction Comments and Proposed Revisions	Action Recommended by ABAG Staff
ALAMEDA COUNTY (CONTINUED)	
Unincorporated Alameda County ABAG staff conferred with County staff. Jurisdiction seeks to reduce the County's RHND allocation by shifting 100% of the unincorporated SOI allocations to the incorporated jurisdictions within the County. **Notes:** Currently, the RHND allocation has assigned 75% of the total unincorporated SOI allocations to the cities (1,886 units) with the remaining 25% of the total unincorporated SOI allocations to the County (629 units). The proposed revision would shift the responsibility for planning for the 629 units in the unincorporated SOI areas to incorporated jurisdictions within the County of Alameda.	**Staff recommends that the Executive Board deny the proposed revision.** The Executive Board adopted a RHND methodology that distributes 75% of the SOI allocations to the cities and the remaining 25% to the counties. The Board also approved guidelines that would allow jurisdictions to redistribute the numbers on a county-wide basis. The proposed revision does not comply with these established guidelines. The guidelines specifically state that an agreement must be reached by all jurisdictions who wish to redistribute the RHND allocations for the unincorporated SOIs. ABAG has not been notified of any agreements reached between Alameda County and the cities of Dublin, Pleasanton, and Livermore.
CONTRA COSTA COUNTY	
Brentwood ABAG staff conferred with City staff; no revision proposed.	**No action necessary.**
Antioch ABAG staff conferred with City staff; no revision proposed.	**No action necessary.**
Clayton ABAG staff conferred with City staff. Jurisdiction seeks to reduce the City's RHND allocation assignment of 446 units to 164 units or less due to data inconsistencies in the DOF estimates of household growth, and ABAG's Local Policy Survey for the City of Clayton.	**Staff recommends that the Executive Board deny the proposed revision.** This proposed revision does not reflect the statutory requirements contained in State Housing Element Law which would warrant a revision. The City suggests that ABAG substitute the DOF household estimates with data obtained from the City's recycling fee assessment records. The alternative data provided by the City is unique to the jurisdiction and does not meet the revision requirements of State Housing Element Law. If a jurisdiction proposes an alternate data source to be used in the methodology, it must be current, accurate, replicable and available on a region-wide basis. The data provided by the City of Clayton is not. Staff has reviewed the Local Policy Survey database and determined that the inaccuracies reported by the City do not impact the household growth and subsequent RHND allocations for the City of Clayton. Therefore a revision is not warranted.

Jurisdiction Comments and Proposed Revisions	Action Recommended by ABAG Staff
CONTRA COSTA COUNTY (CONTINUED)	
Concord	
ABAG staff conferred with City staff; no revision proposed.	**No action necessary.**
Danville	
ABAG staff conferred with City staff; no revision proposed.	**No action necessary.**
El Cerrito	
No comments or proposed revisions submitted.	**No action necessary.**
Hercules	
No comments or proposed revisions submitted.	**No action necessary.**
Lafayette	
ABAG staff conferred with City staff; no revision proposed.	**No action necessary.** The City of Lafayette has reviewed the RHND allocations assigned by ABAG and finds them acceptable.
Martinez	
No comments or proposed revisions submitted.	**No action necessary.**
Moraga	
ABAG staff conferred with City staff; no revision proposed.	**No action necessary.**
Oakley	
No comments or proposed revisions submitted.	**No action necessary.**
Orinda	
No comments or proposed revisions submitted.	**No action necessary.**
Pinole	
No comments or proposed revisions submitted.	**No action necessary.**
Pittsburg	
No comments or proposed revisions submitted.	**No action necessary.**

Jurisdiction Comments and Proposed Revisions	Action Recommended by ABAG Staff
CONTRA COSTA COUNTY (CONTINUED)	
Pleasant Hill	
ABAG staff conferred with City staff; no revision proposed.	**No action necessary.**
Richmond	
ABAG staff conferred with City staff. Jurisdiction requests that ABAG recalculate the City's RHND allocation by income category based upon an alternate methodology supplied by the City.	**Staff recommends that the Executive Board deny the proposed revision.** The proposed revision does not consider the statutory requirements contained in State Housing Element Law, which would warrant a revision. All proposed revisions must be based upon data that is current, replicable, regionally accepted, and considers the same accepted methodology which determined the original RHND allocations. The formula and methodology proposed by City of Richmond staff is unique to the City, and therefore does not represent data that is consistent with the criteria of State Housing Element Law.
San Pablo	
No comments or proposed revisions submitted.	**No action necessary.**
San Ramon	
ABAG staff conferred with City staff. Jurisdiction seeks to reduce the number of housing units in the combined very-low, low and moderate income categories to 1,429 units (Current combined total; 1,955 units). Proposed revision is based upon voter mandates, lack of available land, past housing production performance and legal agreements which constrain residential growth in Dougherty Valley.	**Staff recommends that the Executive Board deny the proposed revision.** The proposed revision does not meet the requirements of State Housing Element Law which would warrant a revision. State Housing Element Law does not recognize local growth control policies and the lack of redevelopment potential as a constraint to planning for the RHND assignment.
Walnut Creek	
No comments or proposed revisions submitted.	**No action necessary.**

Jurisdiction Comments and Proposed Revisions	Action Recommended by ABAG Staff
CONTRA COSTA COUNTY (CONTINUED)	
Unincorporated Contra Costa County	
ABAG staff conferred with County staff. Jurisdiction seeks to modify the RHND methodology by substituting the DOF E-5 report estimate of households with a calculated figure based upon ABAG's forecast of households between 1995 and 2000. This would reduce the household growth forecast for unincorporated Contra Costa County, and the subsequent RHND allocations associated with this share of household growth. The County has provided a revised RHND allocation figure of 4,096 units for the 1999-2006 time frame. **Notes**: In accordance with the Executive Board directive of maintaining the county-wide RHND allocations, any reduction in RHND allocations for unincorporated Contra Costa County would have to be absorbed by one or all of the other jurisdictions within Contra Costa County.	**Staff recommends that the Executive Board deny the proposed revision.** The proposed revision does not meet the requirements of State Housing Element Law which would warrant a revision. Proposed revisions must be based on the same accepted methodology, which determined the RHND allocations for the requesting jurisdiction. After reviewing the comparisons of the DOF estimate of households and the calculated figure based upon ABAG's forecast for 1995 and 2000, it was observed that jurisdictions which are adversely impacted by this proposed revision could appeal based upon the same criteria as the proposed revision. This could result in a cycle of RHND appeals with no foreseeable conclusion. The RHND methodology should be maintained, so that revisions of this type do not create appeals which are based upon the same reasoning as the proposed revision. See ABAG staff explanation concerning the DOF issue.
MARIN COUNTY	
Belvedere	
No comments or proposed revisions submitted.	**No action necessary.**
Corte Madera	
ABAG staff conferred with Town staff. Jurisdiction seeks to reduce the RHND allocation assigned in the third official release (175 units) to match the RHND allocation assigned in the Second Official release (99 units). The proposed modification would reduce the RHND allocation for the Town of Corte Madera by 76 units.	**Staff recommends that the Executive Board deny the proposed revision.** The proposed revision does not reflect the statutory requirements defined in State Housing Element Law, which would warrant a revision. Proposed revisions must be based on the same accepted methodology, which determined the RHND allocations for the requesting jurisdiction.
Fairfax	
ABAG staff conferred with Town staff. Jurisdiction proposes that ABAG reduce the Town's RHND allocation due to a lack of vacant land and environmental constraints. The City does not identify a revised RHND allocation figure.	**Staff recommends that the Executive Board deny the proposed revision.** The proposed revision does not reflect the statutory requirements defined in State Housing Element Law, which would warrant a revision. State Law does not recognize the lack of available land or environmental constraints as factors that preclude a jurisdiction from planning for the RHND allocation assignment.

Jurisdiction Comments and Proposed Revisions	Action Recommended by ABAG Staff
MARIN COUNTY (CONTINUED)	
No comments or proposed revisions submitted.	**No action necessary.**
Mill Valley	
No comments or proposed revisions submitted.	**No action necessary.**
Novato	
ABAG staff conferred with City staff; no proposed revision submitted.	**No action necessary.**
Ross	
ABAG staff conferred with City staff; no revision proposed.	**No action necessary.**
San Anselmo	
No comments or proposed revisions submitted.	**No action necessary.**
San Rafael	
ABAG staff conferred with City staff; no revision proposed.	**No action necessary.** The City will continue to increase housing unit numbers by attempting to legalize dwelling units when feasible, encourage density bonuses, encourage second dwelling units, and pursuing funding for construction of affordable housing units.
Sausalito	
No comments or proposed revisions submitted.	**No action necessary.**
Tiburon	
ABAG staff conferred with City staff; no revision proposed.	**No action necessary.**
Unincorporated Marin County	
No comments or proposed revisions submitted.	**No action necessary.**

Jurisdiction Comments and Proposed Revisions	Action Recommended by ABAG Staff
NAPA COUNTY	
American Canyon	
No comments or proposed revisions submitted.	**No action necessary.**
Calistoga	
ABAG staff conferred with City staff. Jurisdiction proposes that ABAG recalculate the RHND allocation based on existing water and wastewater infrastructure constraints.	**Staff recommends that the Executive Board deny the proposed revision.** The proposed revision does not reflect the statutory requirements defined in State Housing Element Law, which would warrant a revision. Proposed revisions must be based on the same accepted methodology, which determined the RHND allocations for the requesting jurisdiction. State Law considers short term infrastructure constraints as temporary conditions, and therefore do not limit the jurisdiction from planning for the RHND allocation assignment.
Napa	
ABAG staff conferred with City staff. The City of Napa requests that ABAG recalculate the RHND allocation based on short term infrastructure constraints.	**Staff recommends that the Executive Board deny the proposed revision.** The proposed revision does not reflect the statutory requirements defined in State Housing Element Law, which would warrant a revision. Proposed revisions must consider the same accepted methodology that determined the original RHND allocation. According to the Department of Housing and Community Development (HCD), sewer, water and other short term infrastructure constraints which may impede a jurisdiction from accommodating the growth pertaining to the RHND allocation, are considered temporary limitations on development, and therefore do not preclude a jurisdiction from planning for the need assigned by the RHND process.

Jurisdiction Comments and Proposed Revisions	Action Recommended by ABAG Staff
NAPA COUNTY (CONTINUED)	
St. Helena	
ABAG staff conferred with City staff. Jurisdiction seeks to reduce the City's RHND allocation from 130 units to 92 units based upon growth restrictions pertaining to the City's policies on agricultural land preservation, residential growth management, lack of water and transportation infrastructure and limited availability of residentially developable raw land.	**Staff recommends that the Executive Board deny the proposed revision.** The criteria identified by St. Helena does not meet the requirements for a revision as identified in Housing Element Law, which would warrant a revision. According to the Department of Housing and Community Development (HCD), sewer, water and other infrastructure constraints which may impede a jurisdiction from accommodating the growth pertaining to the RHND allocation, are considered temporary limitations on development, and therefore do not preclude a jurisdiction from planning for the need assigned by the RHND process. Growth limiting policies are not recognized in State Housing Element Law as a constraint that would preclude the City from planning for their RHND allocation.
Yountville	
ABAG staff conferred with city staff; no revision proposed.	**No action necessary.** The Yountville Town Council has reviewed the RHND allocations assigned by ABAG. The Town Council concluded that the RHND allocation considers the Town's limited supply of available and undeveloped land.
Unincorporated Napa County	
ABAG staff conferred with County staff. Jurisdiction requests ABAG to recalculate the RHND allocation for the County based upon short term infrastructure constraints and the County's residential growth limiting policies.	**Staff recommends that the Executive Board deny the proposed revision.** The proposed revision does not reflect the statutory requirements defined in State Housing Element Law, which would warrant a revision. Proposed revisions must be based on the same accepted methodology, which determined the RHND allocations for the requesting jurisdiction. Proposed revisions must also consider the overall RHND allocations assigned by the Department of Housing and Community Development (HCD). The revision submitted by Napa County proposes that the ABAG change RHND methodology and take short-term According to Housing Element Law and HCD, growth restrictions pertaining to the County's policies on residential growth management, agricultural land preservation, and inadequate transportation infrastructure are not recognized as constraints that would preclude the County from plannin for their RHND allocation.

Jurisdiction Comments and Proposed Revisions	Action Recommended by ABAG Staff
SAN FRANCISCO CITY/ COUNTY	
ABAG staff conferred with City/ County staff; no revision proposed.	**No action necessary.**
SAN MATEO COUNTY	
Atherton	
No comments or proposed revisions submitted.	**No action necessary.**
Belmont	
ABAG staff conferred with City staff; no revision proposed.	**No action necessary.** The Belmont City Council has reviewed the RHND allocations assigned by ABAG, and feels that the City will be able to identify adequate sites to accommodate the planning responsibility in the update of the City's Housing Element for the 1999-2006 time frame.
Brisbane	
No comments or proposed revisions submitted.	**No action necessary.**
Burlingame	
No comments or proposed revisions submitted.	**No action necessary.**
Colma	
ABAG staff conferred with City staff; no revision proposed.	**No action necessary.**
Daly City	
ABAG staff conferred with City staff; no revision proposed.	**No action necessary.**
East Palo Alto	
No comments or proposed revisions submitted.	**No action necessary.**
Foster City	
ABAG staff conferred with City staff; no revision proposed.	**No action necessary.** The City of Foster City has reviewed the RHND allocations assigned by ABAG and feels that the units allocated to the City are reasonable.
Half Moon Bay	
ABAG staff conferred with City staff; no revision proposed.	**No action necessary.**

Jurisdiction Comments and Proposed Revisions	Action Recommended by ABAG Staff
SAN MATEO COUNTY (CONTINUED)	
Hillsborough	
ABAG staff conferred with City staff; no revision proposed.	**No action necessary.**
Menlo Park	
ABAG staff conferred with City staff; no revision proposed.	**No action necessary.**
Millbrae	
No comments or proposed revisions submitted.	**No action necessary.**
Pacifica	
No comments or proposed revisions submitted.	**No action necessary.**
Portola Valley	
ABAG staff conferred with City staff; no revision proposed.	**No action necessary.**
Redwood City	
No comments or proposed revisions submitted.	**No action necessary.**
San Bruno	
ABAG staff conferred with City staff. Jurisdiction requests that ABAG recalculate the City's RHND allocation based upon environmental constraints related to airport noise levels that limit residential growth, and flaws contained in the employment growth forecasts of Projections 2000 identified by the City. The City has not suggested any specific numbers by which the allocation should be reduced.	**Staff recommends that the Executive Board deny the proposed revision.** The environmental constraints cited by the City have been taken into consideration in the context of the Projections 2000 forecast process. ABAG staff has reviewed the employment projections for the City of San Bruno, and determined that the employment growth forecasts, contained in Projections 2000, do not contain errors.
San Carlos	
ABAG staff conferred with City staff; no revision proposed.	**No action necessary.**
San Mateo	
No comments or proposed revisions submitted.	**No action necessary.**
South San Francisco	
ABAG staff conferred with City staff; no revision proposed.	**No action necessary.**

Jurisdiction Comments and Proposed Revisions	Action Recommended by ABAG Staff
SAN MATEO COUNTY (CONTINUED)	
Woodside	
ABAG staff conferred with City staff; no revision proposed.	**No action necessary.** The Town of Woodside believes the RHND allocations fairly apportions the regional housing need to all Bay Area cities and counties.
Unincorporated San Mateo County	
ABAG staff conferred with County staff; no revision proposed.	**No action necessary.**

Jurisdiction Comments and Proposed Revisions

Action Recommended by ABAG Staff

SANTA CLARA COUNTY

Campbell

No comments or proposed revisions submitted.

No action necessary.

Cupertino

ABAG staff conferred with City staff. Jurisdiction seeks to reduce the RHND allocation for the City based upon a recent annexation of the Rancho Rinconado area, formerly a part of the unincorporated Santa Clara County.

In March 1999, Cupertino annexed 1,562 housing units in the formerly unincorporated Rancho Rinconada neighborhood. These housing units were included as part of the ABAG Projections 2000 households for the year 2006, but were not added to the Department of Finance (DOF) 1999 base numbers. Consequently, Cupertino would experience these units as housing growth between 1999 and 2006, when in fact, these housing units already exist and should be part of the 1999 DOF base. The proposed revision would modify the City of Cupertino's household growth of 3,337 to 1,843. This would reduce the RHND allocation from 3,692 units to 2,720 units.

Notes:
Because the proposed revision shift's households from Santa Clara County to the City of Cupertino, the revision would modify both Santa Clara County and Cupertino's RHND allocations. Therefore a revision a revision would be required for both Cupertino and Santa Clara County.

Staff recommends that the Executive Board approve this proposed revision. ABAG's Projections 2000 forecast of households for 2006 takes into account the Rancho Rinconada annexation by the City of Cupertino. The DOF E-5 report household figure for 1999 does not account for this annexation. Therefore, the DOF figure (33,417 households) as currently used in the RHND methodology for Santa Clara County is incorrect, and should be substituted with a correct figure (31,923 households). The growth currently assigned to Santa Clara County in the methodology is understated by 1,494 households for the 1999 base year. This proposed revision would align the 1999-2006 household growth of Santa Clara County more closely with ABAG's forecast of household growth.

Cupertino Revision. Staff has converted the 1,562 housing unit figure to 1,494 households using the DOF E-5 report's 1999 vacancy rate for the City of Cupertino (4.34%). These households were then added to the City of Cupertino's 1999 DOF E-5 report households figure of 16,661, changing the base number to 18,155 households. This reduces Cupertino's original household growth of 3,337 (1.88% of the total growth for the region) to 1,843 households (1.04% of the total growth for the region). Applying the new share of household growth in the allocation methodology reduces the city of Cupertino's RHND allocation from 3,692 units to 2,720 units (972 unit difference).

Santa Clara County Revision. Due to the Rancho Rinconada neighborhood originally being an unincorporated portion of Santa Clara County, the number of households added to the City of Cupertino (1,494) has to be subtracted from the unincorporated Santa Clara County DOF E-5 report households base figure for 1999, as used in the RHND methodology (33,417 minus 1,494 equals 31, 923 households). This increases Santa Clara County's original household growth of 921 households (0.52% of the total growth for the region) to 2,415 households (1.36% of the total growth for the region) over the 1999-2006 time period. Applying the new share of household growth in the allocation methodology increases the unincorporated Santa Clara County's RHND allocation of 474 units to 1,445 units (includes SOI allocation).

Jurisdiction Comments and Proposed Revisions	Action Recommended by ABAG Staff
SANTA CLARA COUNTY (CONTINUED)	
Gilroy	
ABAG staff conferred with City staff. Jurisdiction seeks to recalculate the RHND allocations based upon an alternate methodology that considers LAFCO Urban Service Area policies, and other criteria that could be used to reduce sprawl. Using the City's alternate methodology would reduce the RHND allocation from 3,710 units to 2,800 units, (a reduction of 910 units) for the 1999-2006 RHND time frame. **Notes:** The proposed revision is not supported by adequate documentation which explains how the proposed RHND allocation was derived.	**Staff recommends that the Executive Board deny the proposed revision.** The proposed revision does not reflect the statutory requirements of State Housing Element Law, which would warrant a revision. Any proposed revision must be based upon available, replicable data, and the same accepted planning methodology which determined the RHND allocation assignment. Proposed revisions must also consider the overall RHND allocations assigned to the region by the Department of Housing and Community (HCD).
Los Altos	
ABAG staff conferred with City staff; no revision proposed.	**No action necessary.**
Los Altos Hills	
ABAG staff conferred with City staff; no revision proposed.	**No action necessary.** The Town of Los Altos Hills believes the RHND allocations fairly apportions the regional housing need to all Bay Area cities and counties.
Los Gatos	
No comments or proposed revisions submitted.	**No action necessary.**
Milpitas	
No comments or proposed revisions submitted.	**No action necessary.**
Monte Sereno	
No comments or proposed revisions submitted.	**No action necessary.**
Morgan Hill	
ABAG staff conferred with City staff. Jurisdiction requests that ABAG modify the RHND methodology to take into account job creation, and growth limits established by a housing units construction cap that is currently in place. The proposed revision does not provide a number by which the allocation should be reduced.	**Staff recommends that the Executive Board deny the proposed revision.** The proposed revision does not reflect the statutory requirements of State Housing Element Law, which would warrant a revision. Any proposed revision must be based upon available, replicable data, and the same accepted planning methodology which determined the RHND allocation assignment. Proposed revisions must also consider the overall RHND allocations assigned to the region by the Department of Housing and Community Development (HCD).

Jurisdiction Comments and Proposed Revisions	Action Recommended by ABAG Staff
SANTA CLARA COUNTY (CONTINUED)	
Mountain View	
ABAG staff conferred with City staff; no revision proposed.	**No action necessary.**
Palo Alto	
No comments or proposed revisions submitted.	**No action necessary.**
San Jose	
No comments or proposed revisions submitted.	**No action necessary.**
Santa Clara	
ABAG staff conferred with City staff. Jurisdiction requests that ABAG reduce the RHND allocation assigned in the third official release (6,339 units) to match the RHND allocation assigned in the second official release (4,229 units). The proposed revision would reduce the RHND allocation for the City of Santa Clara by 3,590 units.	**Staff recommends that the Executive Board deny the proposed revision.** The proposed revision does not cite any criteria defined by State Housing Element Law, which would warrant a revision. The revision submitted by the City of Santa Clara proposes that ABAG modify the RHND methodology. Any proposed revisions must be based on the same accepted methodology that determined the RHND allocations for the requesting jurisdiction. Proposed revisions must also consider the overall RHND allocations assigned by HCD.
Saratoga	
ABAG staff conferred with City staff. Jurisdiction requests that ABAG recalculate the RHND allocation based upon past housing unit production trends and proposed revisions to Projections 2000 job forecasts. Based upon a revised RHND calculation provided by the City, the proposed revision would reduce the RHND allocation assignment of 539 units to a proposed total of 223 units over the 1999-2006 RHND time frame.	**Staff recommends that the Executive Board deny the proposed revision.** The proposed revision cites inaccuracies in the Projections 2000 forecast as the determining factor for an overstatement of the City's RHND allocation assignment. Jurisdiction's were given several opportunities to review and modify, if necessary, their Projections 2000 growth forecasts prior to the release of preliminary RHND allocations to Bay Area jurisdictions. Therefore, requests for modification based upon Projections 2000 data inaccuracies are questionable. All Bay Area jurisdictions are treated equally in this manner.
Sunnyvale	
No comments or proposed revisions submitted.	**No action necessary.**

Jurisdiction Comments and Proposed Revisions	Action Recommended by ABAG Staff
SANTA CLARA COUNTY (CONTINUED)	
Unincorporated Santa Clara County	
ABAG staff conferred with County staff; no revision proposed. The City of Cupertino has proposed a revision which affects the RHND allocation for Santa Clara County. Refer to revision explanation for the City of Cupertino.	See Cupertino Proposed Revision
SOLANO COUNTY	
Benicia	
ABAG staff conferred with City staff; no proposed revision submitted.	**No action necessary.**
Dixon	
ABAG staff conferred with City staff; no proposed revision submitted.	**No action necessary.**
Fairfield	
ABAG staff conferred with City staff. Jurisdiction seeks to revise the income category distribution as follows; Very Low (789), Low (442), Moderate (1,002), Above Moderate (1,574).	**Staff recommends that the Executive Board deny the proposed revision.** The proposed revision seeks to adopt the regional average income distribution for the City's RHND allocation by income category. The proposed revision does not reflect the direction of the Executive Board, which is to move each jurisdiction 50% towards the regional average.
Rio Vista	
ABAG staff conferred with City staff; no proposed revision submitted.	**No action necessary.**
Suisun City	
ABAG staff conferred with City staff; no proposed revision submitted.	**No action necessary.**

Jurisdiction Comments and Proposed Revisions	Action Recommended by ABAG Staff
SOLANO COUNTY (CONTINUED)	
Vacaville	
ABAG staff conferred with City staff. Jurisdiction requests that ABAG substitute the city's DOF 1999 estimate of households in the RHND methodology, with an interpolated figure based upon ABAG's forecast of households in 1995 and 2000. This modification would reduce the household growth forecast for the City of Vacaville, and the RHND allocations associated with this share of household growth. **Notes:** In accordance with the Executive Board directive of maintaining the county-wide RHND allocations, any reduction in RHND allocations from the City of Vacaville would have to be absorbed by other jurisdictions within Solano County.	**Staff recommends that the Executive Board deny this proposed revision** The proposed revision does not meet the requirements of State Housing Element Law which would warrant a revision. Proposed revisions must be based on the same accepted methodology, which determined the RHND allocations for the requesting jurisdiction. After reviewing the comparisons of the DOF estimate of households and the calculated figure based upon ABAG's forecast for 1995 and 2000, it was observed that jurisdictions which are adversely impacted by this proposed revision could appeal based upon the same criteria as the proposed revision. This could result in a cycle of RHND appeals with no foreseeable conclusion. The RHND methodology should be maintained, so that revisions of this type do not create appeals which are based upon the same reasoning as the proposed revision. See ABAG staff explanation concerning the DOF issue.
Vallejo	
ABAG staff conferred with City staff; no revision proposed.	**No action necessary.** The Vallejo City Council approved a resolution to accept the RHND allocation assigned by ABAG for the 1999-2006 time frame.

Jurisdiction Comments and Proposed Revisions

Action Recommended by ABAG Staff

SOLANO COUNTY (CONTINUED)

Unincorporated Solano County

ABAG staff conferred with County staff. Solano County has proposed two revisions to their RHND allocation. An explanation of each is provided below:

Proposed Revision 1:

Jurisdiction seeks to modify the RHND methodology by substituting the DOF E-5 report estimate of households with a calculated figure based upon ABAG's forecast of households between 1995 and 2000. This would reduce the household growth forecast for unincorporated Solano County, and the subsequent RHND allocations associated with this share of household growth.

Notes:
In accordance with the Executive Board directive of maintaining the county-wide RHND allocations, any reduction in RHND allocations for unincorporated Solano County would have to be absorbed by one or all of the other jurisdictions within Solano County.

Proposed Revision 2:

Jurisdiction seeks to modify the RHND methodology by shifting the County's 25% share of the RHND allocation assignment for the unincorporated SOI to each incorporated jurisdiction within Solano County.

Proposed Revision 1:

Staff recommends that the Executive Board deny the proposed revision. The proposed revision does not meet the requirements of State Housing Element Law which would warrant a revision. Proposed revisions must be based on the same accepted methodology, which determined the RHND allocations for the requesting jurisdiction.

After reviewing the comparisons of the DOF estimate of households and the calculated figure based upon ABAG's forecast for 1995 and 2000, it was observed that jurisdictions which are adversely impacted by this proposed revision could appeal based upon the same criteria as the proposed revision. This could result in a cycle of RHND appeals with no foreseeable conclusion. The RHND methodology should be maintained, so that revisions of this type do not create appeals which are based upon the same reasoning as the proposed revision.

See ABAG staff explanation concerning the DOF issue.

Proposed Revision 2:

Staff recommends that the Executive Board deny the proposed revision.

The Executive Board adopted a RHND methodology that distributes 75% of the SOI allocations to the cities and the remaining 25% to the counties. The Board also approved guidelines that would allow jurisdictions to redistribute the numbers on a county-wide basis. The proposed revision does not comply with these established guidelines. The guidelines specifically state that an agreement must be reached by all jurisdictions who wish to redistribute the RHND allocations for the unincorporated SOIs.

ABAG has not been notified of any agreements reached between jurisdictions within Solano County.

Jurisdiction Comments and Proposed Revisions	Action Recommended by ABAG Staff
SONOMA COUNTY	
Cloverdale	
ABAG staff conferred with City staff; no revision submitted.	**No action necessary.** The City of Cloverdale finds the RHND allocation for the 1999-2006 timeframe to be generally within the growth projections and policies of the City's General Plan.
Cotati	
ABAG staff conferred with City staff; no revision proposed.	**No action necessary.**
Healdsburg	
ABAG staff conferred with City staff. Jurisdiction seeks to reduce the City of Healdsburg's RHND allocation from 573 units to 513 units. Revision is based upon an alternate methodology which uses the growth forecasts for the cities and counties contained in Projections 2000 as a basis for determining the RHND allocations.	**Staff recommends that the Executive Board deny the proposed revision.** The proposed revision does not reflect the statutory requirements as defined by State Housing Element Law, which would warrant a revision. The revision submitted by the City of Healdsburg suggests that ABAG substitute the HCD assigned overall RHND allocation with the regional growth as determined by ABAG's Projection's 2000 forecast. Any proposed revision must be based upon available data, and the same accepted planning methodology which determined the RHND allocations for the requesting jurisdiction. Proposed revisions must also consider the overall RHND allocations assigned by the Department of Housing and Community Development (HCD).
Petaluma	
ABAG staff conferred with City staff; no revision proposed.	**No action necessary.** The City approves of its housing needs allocation of 597 units for the period 1999-2006. The City made general comments about the County's policy of city-centered growth and the need to consider the many urban growth boundaries that exist for cities in Sonoma County. Comments were also made concerning infrastructure limitations, the need to consider smart growth principles when balancing jobs and housing, and the need to recognize past affordable housing development. The City also suggested that ABAG work with jurisdictions in the region to reform State Housing Element Law as well as the RHND process.

Jurisdiction Comments and Proposed Revisions	Action Recommended by ABAG Staff
SONOMA COUNTY (CONTINUED)	
Rohnert Park	
ABAG staff conferred with City staff. Jurisdiction seeks to modify the RHND allocation by reversing the assignment of housing need between the SOI allocation and the City boundary allocation. The overall RHND allocation will not be reduced. The preliminary RHND allocation for Rohnert Park is 2,124 units. Out of this total, 1,462 units are assigned to the current city boundaries and the remaining 662 units are assigned to the unincorporated SOI. The Jurisdiction proposes that out of the total RHND allocation of 2,124 units, 621 units could be accommodated within the current city boundaries and the remaining 1,503 units could be accommodated within the proposed SOI.	**No action necessary.** Jurisdictions are responsible for planning for the total RHND allocation in any manner that is feasible, meets the criteria as defined by Housing Element Law, shows no reduction to the overall RHND allocations. The Department of Housing and Community Development (HCD) has stipulated that jurisdictions seeking to plan for the RHND allocation in unincorporated SOI areas, (both inside the current SOI boundaries and areas in which the jurisdiction intends to annex), must demonstrate that adequate infrastructure, i.e. streets, sewer and water, will be available within the applicable RHND planning period (1999-2006). In addition, areas which are planned to be annexed during the RHND planning time frame, must be approved and adopted in a timely manner that will allow the planned development to occur within the annexed areas. Jurisdictions must submit to HCD a detailed schedule of the annexation process, which clearly provides enough time for adequate infrastructure to be in place allowing development to commence within the RHND planning time frame.
Santa Rosa	
ABAG staff conferred with City staff; no revision proposed.	**No action necessary.** The City of Santa Rosa has reviewed the RHND allocation assigned by ABAG. The City accepts the RHND allocation as a target for meeting its share of the regional housing need and will develop programs to achieve this goal.
Sebastopol	
ABAG staff conferred with City staff. Jurisdiction seeks to reduce the RHND allocation assigned in the third official release (274 units) to match the RHND allocation assigned in the Second Official release (157 units). The proposed modification would reduce the RHND allocation for the City of Sebastopol by 117 units.	**Staff recommends that the Executive Board deny the proposed revision.** The proposed revision does not cite any criteria which would warrant a revision, as defined by State Housing Element Law.
Sonoma	
ABAG staff conferred with City staff; no revision proposed.	**No action necessary.**

Jurisdiction Comments and Proposed Revisions

Action Recommended by ABAG Staff

SONOMA COUNTY (CONTINUED)

Windsor

ABAG staff conferred with City staff. Jurisdiction requests that the RHND allocation be revised to 170 units per year (a total of 1,275 units) over the 1999-2006 RHND time frame.

Staff recommends that the Executive Board deny the proposed revision. The proposed revision does not meet the requirements of CA State Housing Element Law which would warrant a revision. The proposed revision seeks to modify the RHND allocation by reducing the total allocation to match the growth management ordinance established by the Town of Windsor. Growth management policies that limit the construction of housing units are not recognized by the statute.

Unincorporated Sonoma County

ABAG staff conferred with County staff. Jurisdiction requests that ABAG and HCD resume negotiations over the total regional "goal" number, with the intent that the regional number be reduced to match the corresponding housing unit forecast as contained in the Projections 2000 report. The County proposes that the methodology should consider the following criteria:

1. The household projections in Projections 2000 should be prorated to correspond to the 7.5 year planning period (1999-2006)
2. City holding capacity and allocations should be based upon the adopted SOI boundary, or any other voter approved Urban Growth Boundary
3. The allocations to each jurisdiction should be consistent with the jurisdiction's General Plan Land Use Map holding capacity for that 7.5 year period

Following this method, the subsequent RHND allocations for the unincorporated areas Sonoma County should be reduced from 13,041 units to approximately 3,123 units.

Staff recommends that the Executive Board deny the proposed revision. The revision criteria cited does not meet the requirements for a revision as defined by housing element law. Any proposed revision must be based upon available data, and the same accepted planning methodology which determined the RHND allocations for the requesting jurisdiction. Proposed revisions must also consider the overall RHND allocations assigned by the Department of Housing and Community Development (HCD).

The revision submitted by Sonoma County suggests that ABAG substitute the HCD assigned overall RHND allocation with the regional growth as determined by ABAG's Projection's 2000 forecast. The overall allocation assigned to Sonoma County has been reduced from 13,041 units to 6,799 units as a result of the Executive Board's modification to the RHND methodology at their May 18, 2000, board meeting.