



CITY OF SARATOGA

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Incorporated October 22, 1956

June 05, 2012

Ken Kirkey
ABAG Planning Director
101 Eight Street
Oakland, CA 94607

RE: Comments on the Draft RHNA Methodology

Dear Mr. Kirkey:

Thank you for sending the City of Saratoga the draft Regional Housing Need Allocation (RHNA) Methodology, which we received on May 30, 2012. Based on my review of the proposed methodology, I believe that it does not promote an improved relationship between jobs and housing. I also believe that it would not result in a housing distribution that maximizes the use of public transportation and existing transportation infrastructure.

The projected 60,606 units allocated to Santa Clara County would be very similar to the County's 2007 - 2014 allocation, yet some cities with large employment centers and convenient transit access would be allocated a much smaller number of units in 2014-2022. The draft methodology consequently burdens the smaller and built-out cities that have limited employment and transit opportunities with a much higher housing ratio, up to 1.5 times the 2007 - 2014 allocation.

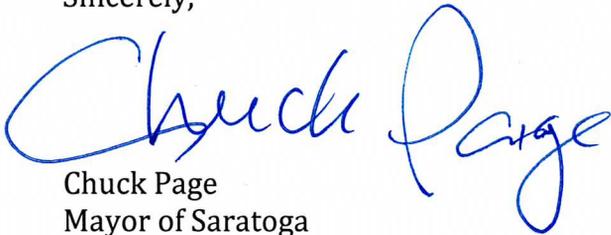
	2014 - 2022 DRAFT RHNA	2007 - 2014 RHNA	Difference (units)
Santa Clara County	60,606	60,338	268
City of Santa Clara	3,812	5,873	(2,061)
Unincorporated	58	1,090	(1,032)
Palo Alto	2,192	2,860	(668)
Los Altos	476	317	159
Saratoga	438	292	146
Los Gatos	616	562	54
Los Altos Hills	122	81	41
Monte Sereno	62	41	21

The use of a minimum housing floor using 40% of household formation growth results in a housing allocation that is clearly inconsistent with the overall objective of Government Code 65584 and Senate Bill 375, to better integrate land-use and transportation planning. Any significant housing growth in smaller bedroom communities that are not supported by employment centers or public transit would increase regional vehicle miles traveled and greenhouse gas emissions.

The draft proposed methodology also penalizes smaller cities that have a lower number of affordable units permitted in the 1999 - 2006 cycle. Cities should be evaluated on the number of affordable units permitted as a percentage of the total units permitted in their jurisdiction. Affordable housing units are being built in smaller built-out cities and those cities should be acknowledged for that effort based on the performance of the local housing market and the total number of permits issued.

I appreciate the opportunity to provide my perspective regarding the proposed methodology. Please include my comments in the feedback provided to the ABAG Executive Board at its July 19, 2012 meeting.

Sincerely,

A handwritten signature in blue ink that reads "Chuck Page". The signature is written in a cursive style with a large, looping "C" and "P".

Chuck Page
Mayor of Saratoga