July 12, 2012

Association of Bay Area Governments
Executive Board
PO Box 2050
Oakland, CA 94604-2050

RE: Comments on draft Regional Housing Need Allocation (2014-2022) Methodology

Dear ABAG Executive Board:

This letter is in response to the draft Regional Housing Need Allocation (2014-2022) Methodology, to be considered by the ABAG Executive Board on July 19, 2012. The Town of Ross is a small, built-out, single-family residential community. We are concerned that the methodology may result in overestimating the housing units that the Town may realistically develop in the housing cycle, even with incentives provided in our Housing Element.

Fair Share Component

The Town recommends that ABAG modify the methodology to provide credit to jurisdictions like the Town of Ross that have adopted housing elements and have implemented the programs in those housing elements. The Town of Ross was one of the first jurisdictions in Marin County to have an adopted housing element for the current cycle. The Town has implemented nearly every one of the many programs to encourage housing production in our community. The proposed RHNA methodology puts the Town at an unfair disadvantage and rewards communities (some that do not have adopted housing elements for the current cycle) that have available land area to develop and where market conditions and State incentives make it more feasible to develop new housing, particularly affordable housing.

The Town has reduced constraints and increased incentives for development of new units, particularly affordable units, within the developed areas of our community. However, it takes time to realize new units in a built-out community.

Income Allocation

The Town of Ross recommends that ABAG apply the Income Allocation for the region to the Bay Area jurisdictions, rather than further allocate the units. The proposed methodology may decrease affordable housing production. The past RHNA production illustrates that certain communities have larger available land inventory for development, larger sites to accommodate higher densities, and more opportunity to develop affordable housing near major transportation and services that make housing affordable.

Sphere of Influence Adjustment

No information has been provided regarding the housing need generated by Ross' sphere of influence, which is also a built-out single family residential area with a high proportion of

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market rate housing. The Town has no authority to zone outside of its boundaries or to provide incentives for the creation of housing units in its sphere of influence.

Provide data for public review for Fair Share Component factors

The Town has been unable to review all of the data used to generate the draft RHNA (2007-2022). We would like this data to be made available in order to provide meaningful comment on the methodology. The Town of Ross requests that ABAG also make public a spreadsheet that details the formulas and the inputs for the draft RHNA prior to final adoption of the RHNA Methodology and RHNA.

Employment Data

The employment data has not been made available for public review. The Town believes that the 510 existing jobs identified for Ross in the Sustainable Communities Strategy is high. We hope that ABAG will complete peer review the growth projections for Marin County prior to calculation of the RHNA.

Past RHNA Performance

If the adopted methodology includes Methodology 2(iii) "Past RHNA Performance," the Town requests that ABAG allow the Town to submit its actual performance for the 1999-2006 RHNA cycle. ABAG is estimating the Town's housing production for 1999-2006, an estimate that does not correspond with the Town's low income housing production for that cycle.

ABAG should ensure that the data for the 1999-2006 RHNA housing production is accurate and consistent. The State of California has only recently required jurisdictions to provide annual reports on RHNA housing production. Even with the new standard report, Ross town staff has found that the information provided for housing production varies widely by jurisdiction and does not necessarily reflect completed units.

Transit

The Town of Ross is not located along a major transit corridor. However, all residences in the Town are within a mile of frequent and reliable transit. We cannot provide any meaningful comment on this factor since the transit factor used for Ross and other Marin jurisdictions for the draft RHNA has not been made public.

Thank you for the opportunity to provide comment.

Sincerely,

ROSS TOWN COUNCIL

Rupert Russell, Mayor
Elizabeth Brekhus
Katherine Hoertkorn
Beach Kuhl
Carla Small

cc: Marin County Supervisor Susan Adams