



July 6, 2012

Ken Kirkey
Director of Planning and Research
Association of Bay Area Governments
P.O. Box 2050
Oakland, CA 94604-2050

Delivered via e-mail to kennethk@abag.ca.gov and RHNA_Feedback@abag.ca.gov

Re: Adoption of draft Regional Housing Need Allocation (RHNA) methodology

Dear Mr. Kirkey:

On July 3, 2012, the Walnut Creek City Council reviewed the recently released draft Regional Housing Need Allocation (RHNA) Methodology for the upcoming 2014 – 2022 cycle. The following comments are based upon direction given by the Council:

Due to the timelines contained in State Law, the RHNA methodology is being prepared prior to the adoption of the Sustainable Communities Strategy (SCS), despite the fact that State Law also requires the RHNA methodology to be consistent with the SCS. The final SCS will not be adopted until April 2013, by which time the final RHNA allocations will have already been issued. Given this situation, the RHNA methodology should include a mechanism that allows for the reduction of an individual jurisdiction's RHNA allocation, should that jurisdiction's growth projections contained within the final SCS be significantly lower than those contained in the recently approved Preferred Land Use and Transportation Investment Strategy (the preferred scenario for the SCS).

Thank you for the opportunity to comment. If you have any questions regarding this letter, please feel free to contact me at (925) 943-5899 x2213 or asmith@walnut-creek.org.

Sincerely,

Andrew M. Smith
Senior Planner

Cc: Walnut Creek City Council
Ken Nordhoff, City Manager
Sandra Meyer, Community Development Director
Steve Buckley, Planning Manager
Laura Simpson, Housing Program Manager