REGIONAL HOUSING NEEDS ALLOCATION



2023-2031 Regional Housing Needs Assessment (RHNA) Appeal Request

Submit appeal requests and supporting documentation via DocuSign by <u>5:00 pm PST on July 9, 2021</u>. **Late submissions will not be accepted.** Send questions to <u>rhna@bayareametro.gov</u>

Jurisdiction Whose Allocation is Being Appealed	Pleasant Hill				
Filing Party: O HCD \otimes Jurisdiction: $\frac{City\ of\ Ple}{City}$					
Contact Name: Troy Fujimoto	Title:_City Planner				
Phone:					
APPEAL AUTHORIZED BY:	PLEASE SELECT BELOW:				
Name: June Catalano	O Mayor				
Signature: June W Catalour	O Chair, County Board of Supervisors				
01 ST4000EED (401	O City ManagerO Chief Administrative Officer				
Date: 7/9/2021	O Other:				
IDENTIFY ONE OR MORE BASES FOR APPE	AL [Government Code Section 65584.5(b)]				
Fair Housing (See Government Code Section Existing and projected jobs and housing Sewer or water infrastructure constraint actions, or decisions made by a provide Availability of land suitable for urban declopmed Lands protected from urban developmed County policies to preserve prime agrice Distribution of household growth assuructure County-city agreements to direct growth Loss of units contained in assisted house Households paying more than 30% or 500 The rate of overcrowding. Housing needs of farmworkers. Housing needs generated by the present Housing needs of individuals and familia	g relationship. Its for additional development due to laws, regulatory or other than the local jurisdiction. It evelopment or for conversion to residential use. It under existing federal or state programs. In ultural land. In ed for Plan Bay Area 2050. Ith toward incorporated areas of county. It is in developments. It is of their income in rent. In the control of the income in rent.				
3	targets to be met by Plan Bay Area 2050.				
, and the second	Draft RHNA Allocation in accordance with the Final furthers, and does not undermine the RHNA 65584(d) for the RHNA Objectives).				
jurisdictions that merits a revision of the inf	umstances has occurred in the local jurisdiction or formation submitted in the Local Jurisdiction Survey an only be made by the jurisdiction or jurisdictions				

Pursuant to Government Code Section 65584.05, appeals shall be based upon comparable data available for all affected jurisdictions and accepted planning methodology, and supported by adequate documentation, and shall include a statement as to why the revision is necessary to further the intent of the objectives listed in Government Code Section 65584(d). An appeal shall be consistent with, and not to the detriment of, the development pattern in the sustainable communities strategy (Plan Bay Area 2050 Final Blueprint). (Click here)

Number of u	nits requested to be reduced <u>or</u> a	idded to jurisdicti	ion's Draft RHNA A	llocation:
⊗ Decrease	Number of Units: 1,019	O Increase	Number of Units:	
further the ir the revision i Plan Bay Are	tion of appeal request and stater ntent of the objectives listed in G s consistent with, and not to the a 2050. Please include supporting nal pages if you need more room.	overnment Code detriment, of the	Section 65584(d) a development pat	nd how tern in
	etter and Attachments			
	rting documentation, by title and not title and the state of the state	d number of page	es	
	ondence from Contra Costa Water Distric	t, 1 page		
	port for alternate RHNA Methodology, Dat			
The maximum j	file size is 25MB. To submit larger files,	please contact <u>rhna(</u>	<u> Dayareametro.gov.</u>	Click here t



July 9, 2021

ABAG Administrative Committee Association of Bay Area Governments (ABAG) Bay Area Metro Center 375 Beale Street, Suite 800 San Francisco, CA 94105-2066

SUBJECT: City of Pleasant Hill Appeal of the Draft Regional Housing Needs Allocation (RHNA), 2023-2031

Dear Committee Members:

On behalf of the City Council and the Pleasant Hill community, and in accordance with applicable California Government Code Section 65584.05, the City of Pleasant Hill ("City") hereby submits this appeal of the Draft Regional Housing Needs Allocation ("RHNA") received on May 25, 2021 for the upcoming Housing Element Cycle (2023-2031) to the Association of Bay Area Governments ("ABAG").

The City of Pleasant Hill believes that based on the facts of this letter, a revision to the Draft RHNA allocation of 1,803 units is necessary to reflect the current conditions of the City and to further the intent of the statutorily mandated objectives listed in Government Code Section 65584(d). In addition, this appeal is consistent with, and not to the detriment of, the development pattern in Plan Bay Area developed pursuant to Government Code Section 65080(b)(2) as noted in this letter.

- 1. Local Planning Factors –ABAG failed to adequately consider the local planning factors relevant to the City of Pleasant Hill that directly influence housing production.
 - a. Specifically, this information includes lands impacted by the Buchanan Airport to the northeast of the City.

Within certain airport safety zones, restrictions are in place to limit building height and density. The Airport Land Use Compatibility Plan for Buchanan Airport has a safety (protected) zone that covers a significant portion of the northeast corner of the City (https://www.contracosta.ca.gov/DocumentCenter/View/856/Buchanan-Field-Airport-

<u>Policies?bidId</u>=, see page 3-9). The limitations are in Safety Zones 2 & 3, which specifically prohibits residences. In addition, Safety Zone 4, in the northeast area of the City, has a building limitation of four stories. Combined, Safety Zone 2, 3 and 4 cover approximately 250 acres.

The majority of the City is developed with single-family residences. The prevalence of these single-family residential areas make it difficult to increase housing units, particularly over the relatively short 6th cycle eight year timeframe, without new multi-family residential designations. These new housing designations, however, would be largely located within airport safety zones and impacted airport noise areas (see map/link as previously noted).

b. Availability of land suitable for urban development or for conversion to residential use; the availability of underutilized land; and opportunities for infill development and increased residential densities.

One of the factors included within the methodology to determine RHNA allocations is employment growth. This strategy will keep people close to jobs, which in turn will reduce vehicle miles traveled and subsequently reduce greenhouse gas emissions. To maintain a proper job/housing balance, lands for employment should be preserved and provided within the City. It is important to have an inventory of land suitable to accommodate existing and future job growth. Approximately 14.7% of Pleasant Hill's land is currently available for employment uses. The significant increase and number of the RHNA allocation will force the City to re-designate commercial lands to residential. This will effectively limit the City's ability to create jobs, further increasing the jobs/housing imbalance. Thus, there is a flaw in relying on a large-scale conversion of non-residential lands to accommodate housing.

Please see the discussion above regarding airport safety zone impacts on underutilized lands in the City. In addition to nearby airport impacts, the City has less than 60 acres of vacant land in various land use classifications (Table CD1, Development Potential, City of Pleasant Hill General Plan, 2003).

Table CD1. Development Potential

Land Use Designation	Allowed	Existing Development 2002		General Plan Buildout			Vacant Land 2002			
	Density ¹							tional		
		SF	MF		Parcels	Acres		ntial ³	Parcels	Acres
		Units	Units ²	Sq. Ft.			Units	Sq. Ft.		
Single-family Low	1.3-3	377	2		399	316.4	87		17	26.3
Single-family Medium	3.1-4.5	3,948	130	378	4,025	1,355.5	116		28	11.3
Single-family High	4.6-6.9	4,177	30	63,417	4,203	796.0	35		7	5.6
Multifamily Very Low ⁴	7-11.9				559	79.9	54			
Multifamily Low	12-19.9	45	1,736		824	54.95	30		1	0.3
Multifamily Medium	20-29.9	10	1,512	72,655	883	83.3	143		7	5.1
Multifamily High	30-40	8	396	93,012	13	16.6	310			
Multifamily Very High	41-73				1	4	82			
Cleaveland Multifamily Very High	40.1-93				1	2.33	189			
Commercial & Retail	0.4	3	551	2,316,321	182	157.4	99	206,440	4	6.6
Tourist Commercial	1.0			12,112	5	2.5		108,900	1	0.4
Neighborhood Business ⁴	0.35				28	22.8				
Office	0.4	3	193	832,217	97	80.9	30	146,141	4	2.3
Mixed Use	12-40 0.475 FAR		285	290,509	235	91.24	363	40,075		
Light Industrial	0.33			365,043	20	34.2				
Park					26	154.8				
Open Space					15	252.8				
Semi-public & Inst.				259,163	51	98.85		_	2	1.8
School					19					
Total		8,571	4,835	4,304,827	11,587	3,861.2	1,267	501,556	71	59.7

Many of the vacant properties are distributed throughout single-family neighborhoods, making higher density housing difficult to build without acquiring existing homes. In fact, almost half of the City's vacant land is available on only one 26-acre site. Assuming that vacant land could accommodate housing at a density of approximately 30 units per acre, and using the one largely vacant 26-acre site, it could accommodate approximately 780

residential units. There would still be a remaining 1,020 units to be located in other remaining vacant and under-utilized sites throughout the City. (Note – This data is from the 2003 City of Pleasant Hill General Plan, an update is currently underway.)

The City has approximately 570 acres of commercial lands within the City, many of which are developed with tenants and property owners that are not likely to change over the next Housing Element cycle (due to age of existing buildings and tenant leases). If the City cannot facilitate enough landowners to make their land available for housing through various regulatory incentives during the eight year cycle timeframe, the City will not be able to meet its RHNA requirement.

c. Unknown availability, long-term, of water resources for the housing numbers expected.

Contra Costa Water District (CCWD), which provides water to the majority of the City, has not analyzed the impact of the RHNA increase in housing numbers within its service area (see Attachment 1). Compounding the water impacts are increased drought periods in California and the Western Region of the Country. A recent study by https://www.ppic.org/publication/droughts-in-california/ has noted that climate warming is worsening drought and weather conditions in the State. Significant increases in housing without first understanding if there will be adequate water resources to provide such housing risks the safety and well-being of residents.

- 2. Methodology ABAG failed to determine the share of the regional housing need in accordance with the information described in and the methodology established pursuant to Government Code Section 65584, and in a manner that furthers and does not undermine the intent of the objectives listed in Government Code Section 65584(d) and as noted below.
 - a. Increasing the housing supply and the mix of housing types, tenure, and affordability in all cities and counties within the region in an equitable manner.

The City of Pleasant Hill submitted a letter of support for the Plan Bay Area 2050 Baseline Data Methodology which offered a more fair and equitable distribution of housing throughout the Bay Area Region (Attachment 2). Specifically, the City supported the methodology that would distribute more housing near job growth centers, which reduces transit and transportation congestion and reduces greenhouse gas emissions.

ABAG selected the Future Year 2050 Households from the Plan Bay Area 2050 Blueprint methodology. This option considered a jurisdiction's initial share of the RHNA based on its share of the region's total households in the year 2050. Using households in 2050 takes into consideration the number of households that are currently living in a jurisdiction as well as the number of households expected to be added over the next several decades. This methodology minimizes focusing housing growth in areas of job growth and has a greater focus on expected household growth, regardless of expected job growth in the jurisdiction.

Distributing more housing in areas that are expected to have lower job growth, such as Contra Costa County/Pleasant Hill, will put additional pressure on residents to live further away from job centers.

City of Pleasant Hill Housing Share

Based on the Projections 2040 (http://projections.planbayarea.org/) completed by ABAG and MTC, and a tool that was used as part of the RHNA process, the following conclusions can be made:

• The table below shows projected job and RHNA increases in Pleasant Hill compared to other Bay Area jurisdictions with similar population sizes and with similar levels of resources (https://belonging.berkeley.edu/2021-tcac-opportunity-map):

Jurisdiction	Job Increase (Projections 2040 – 2020-2030)	RHNA Increase (compared from 5 th Cycle to 6 th Cycle)
Pleasant Hill	1.90%	302.46%
Alameda County - City A	13.48%	62.76%
Napa County – City A	15.78%	13.78%
San Mateo County – City A	2.03%	277.40%
San Mateo County – City B	2.16%	349.77%
San Mateo County – City C	2.81%	358.89%
Santa Clara County – City A	6.55%	219.08%
Santa Clara County – City B	2.80%	310.48%
Santa Clara County – City C	4.26%	221.97%
Santa Clara County – City D	3.57%	289.98%

Based on the data provided in the table above, we can make the following conclusions:

- The City of Pleasant Hill has the lowest projected job growth rate of the selected comparable jurisdictions. However, the City has a higher housing growth rate than all but three jurisdictions.
- Many of the jurisdictions with a lower housing growth rate are located near large growth centers in the Bay Area (i.e. Santa Clara, San Francisco, and Alameda Counties).

Based on this information, with the goal of RHNA to distribute housing growth equitably throughout the region and near job growth centers, there is justification to support a reduction of the RHNA for Pleasant Hill to be more consistent with other jurisdictions in other regions of the Bay Area.

- The 6th Cycle RHNA increased by 135%, when compared to the 5th Cycle RHNA.
 - The City of Pleasant Hill Housing Need went up by 302%, more than double the rate of the entire Bay Area Region. If the City had the same increase, 135%, this would equate to 605 units. Including the equity adjustment (179 units) that was applied to the City would bring the total number of housing units to a more reasonable 784. This would reflect the City's job growth as compared to other jurisdictions and regions.

The information above justifies a reduction in the City's RHNA as noted in the section above.

b. Promoting infill development and socioeconomic equity, the protection of environmental and agricultural resources, the encouragement of efficient development patterns, and the achievement of the region's greenhouse gas reductions targets provided by the State Air Resources Board pursuant to Section 65080.

As noted in the section above, housing growth has not been distributed in an equitable manner or in a manner that places residences near job growth centers. Greater job growth is anticipated for Santa Clara and Alameda County communities (see discussion below). If housing growth does not match anticipated job growth in a certain area, workers will have to look outside the job growth region for housing, forcing increased commute distances and increasing, not reducing, vehicle miles traveled (VMT). This increase in VMT will have a resulting increase in greenhouse gas production, as 28% of greenhouse gas emissions in California are produced by passenger vehicles (https://ww3.arb.ca.gov/cc/inventory/pubs/reports/2000 2018/ghg inventory trends 00-18.pdf).

Allocating housing to outlying areas, away from job growth areas, appears to be in conflict with Plan Bay Area goals of reducing greenhouse gas emissions by siting housing closer to job growth areas.

c. Promoting an improved intraregional relationship between jobs and housing, including an improved balance between the number of low-wage jobs and the number of housing units affordable to low-wage workers in each jurisdiction.

ABAG projected that job growth in other counties of the Bay Area, including Santa Clara and Alameda Counties, would be 36% and 22% respectively (https://www.planbayarea.org/sites/default/files/FinalBlueprintRelease_December2020_GrowthPattern_Jan2021Update.pdf). Contra Costa County's jobs and housing growth is at 9% and 12% respectively. With more housing than job growth, the region's jobs/housing imbalance will not be improved, which could equate to an increase in vehicle miles traveled for those that will need to commute out of the County to their jobs.

It would be equitable and more in line with improving the jobs/housing balance to shift increased housing to areas that are expected to experience higher job growth. This further

supports a reduction in housing for jurisdictions in Contra Costa County and an increase in other areas that will experience higher numbers of job increases.

d. Balance disproportionate household income distributions (more high-income RHNA to lower income areas and vice-versa).

Based on the 2020 Opportunity Map produced by HCD and the California Tax Credit Allocation Committee (TCAC), the majority of the City lies within the Moderate Resource category, with a portion in the High Resource category. When reviewing other Bay Area regions, it appears that the percentage increase is inconsistent with other similar, higher resource, jurisdictions.

The methodology for this portion for the RHNA (equity adjustment) makes a comparison only within the (Contra Costa) County (Draft Regional Housing Need Allocation (RHNA) Plan: San Francisco Bay Area, 2023-2031 (May 2021). This methodology appears flawed since the equity housing number increases or decreases are applicable to the County only, while the total RHNA is applied and distributed throughout the greater Bay Area region. When compared to other Bay Area jurisdictions, the City of Pleasant Hill appears to have an equity adjustment that is greater than other Bay Area jurisdictions that have comparable or lower resource categories. Thus, ABAG should reconsider the equity adjustment beyond a comparison within the County and should apply it regionally.

Conclusion

Pursuant to Government Code Section 65584.05(b), the City of Pleasant Hill requests revisions to the Final Draft RHNA Allocation that are necessary to further the intent of the objectives stated in Government Code Section 65584(d). While the City is committed to contributing to the collective local, regional, and State needs for housing, the City has noted that the Draft RHNA Allocation needs further revisions and is in excess of what is reasonable and necessary for the City of Pleasant Hill. Therefore, the City respectfully appeals the Final Draft RHNA Allocation and methodology used and requests the RHNA Allocation be revised so that it fulfils the objectives identified in the Government Code. The City is recommending its RHNA be 784 units (with the same percentage of affordable units as currently designated), which is better in keeping with the City's analysis of potential growth and availability of land that can be developed for housing.

Sincerely,

June Catalano City Manager

City of Pleasant Hill

June W. Catalano

Attachments

Troy Fujimoto

Subject:

FW: Follow up to CCWD-City Managers' Meeting

From: Jennifer Allen < jallen@ccwater.com > Sent: Tuesday, June 22, 2021 3:40 PM

To: rbernal@antioch.ca.gov; togden@brentwoodca.gov; Monica.Nino@cao.cccounty.us; rschwartz@ci.clayton.ca.us; efigueroa@cityofmartinez.org; mcmurray@ci.oakley.ca.us; gevans@ci.pittsburg.ca.us; buckshi@walnut-creek.org; June Catalano@pleasanthillca.org>; valerie.barone@cityofconcord.org; julie.enea@cao.cccounty.us

Cc: svasquez@antiochca.gov; dwilliams@brentwoodca.gov; Tia.Wilborn@cao.cccounty.us; jcalderon@ci.clayton.ca.us; wasquez@ci.oakley.ca.us; <a href="https://mailto:

Buchanan < KBuchanan@ccwater.com >

Subject: Follow up to CCWD-City Managers' Meeting

Good afternoon! Thank you for the lively discussion yesterday – we covered a lot of territory.

I'm following up on the question about if our water supply/demand projections include the Regional Housing Needs Allocation (RHNA) information. Our water supply/demand projections are included in our Urban Water Management Plan (UWMP) which is updated every five years. The 2020 UWMP included information from each of your General Plans and Plan Bay Area 2040. The next update for our UWMP will begin in 2024 and we will incorporate information from RHNA and Plan Bay Area 2050 in that plan. So, short answer is not now, but will be in the next UWMP update.

If you have any additional questions, please let us know.

Thank you! Jennifer

Jennifer Allen

(Pronouns: she, her, hers)
Director of Public Affairs

P 925-688-8041

C 925-297-9739

W ccwater.com

CONTRA COSTA WATER DISTRICT

1331 Concord Avenue, Concord, CA 94520

Facebook | Twitter





September 29, 2020

Mayor Jesse Arreguin, Chair Association of Bay Area Governments Housing Methodology Committee 375 Beale Street, Suite 700 San Francisco, CA 94105

RE: Support of the Plan Bay Area 2050 Baseline Data Methodology (Future Housing Growth 2015-2050 Plan Bay Area 2050 Baseline Data Methodology)

Chair Arreguin:

The City of Pleasant Hill has adopted the attached resolution that is consistent with a letter of support sent by the Contra Costa County Mayors Conference (dated August 7, 2020) and attached for reference.

Sincerely,

Troy Fujimoto
Acting City Planner

Attachment: City of Pleasant Hill City Council Resolution No. 79-20

Contra Costa County Mayors Conference Letter of Support, August 7, 2020

CC: File

RESOLUTION NO. 79-20

RESOLUTION OF THE CITY COUNCIL OF THE CITY OF PLEASANT HILL SUPPORTING THE CONTRA COSTA COUNTY JURISDICTIONS' SUPPORT FOR THE 'PLAN BAY AREA 2050' HOUSING ALLOCATION METHODOLOGY THAT MATCHES HOUSING ASSIGNMENTS PROXIMATE TO JOB CENTERS

WHEREAS, the Contra Costa County Jurisdictions recognize and respect the local needs and character of each community, and have a shared interest in maintaining local control of decision-making related to all aspects of the management of each jurisdiction, including but not limited to financial, land use and development, and growth-related matters; and

WHEREAS, in June 2020, the California Department of Housing and Community Development (HCD) determined that the San Francisco Bay region must plan to accommodate 441,176 housing units over the upcoming 8-year housing element cycle (2022-2030); and

WHEREAS, according to Association of Bay Area Governments (ABAG), this represents a 135% increase from the previous housing element assignment; and

WHEREAS, ABAG has formed a Housing Methodology Committee (HMC) that is charged with evaluating and making a recommendation on how these housing units would be allocated to the Bay Area's 101 cities and 9 counties; and

WHEREAS, at a very high level, the HMC is considering a variety of options and factors for allocating housing units; and

WHEREAS, selecting a 'baseline data' methodology has the greatest impact on Contra Costa communities and ensuring that there is a match between housing assignments and job centers; and

WHEREAS, the Contra Costa Mayors Conference at their August 6, 2020 meeting discussed and unanimously supported the 'Plan Bay Area 2050 Baseline Data Methodology'; and

WHEREAS, the Contra Costa Mayors Conference sent a letter of support for the 'Plan Bay Area 2050 Baseline Data Methodology' on August 7, 2020.

NOW THEREFORE, BE IT RESOLVED, by the City Council of the City of Pleasant Hill to re-affirm the Contra Costa Mayors' Conference letter of support for the support for the 'Future Housing Growth 2015-2050 Plan Bay Area 2050 Baseline Data Methodology' which is consistent with decades-long region-wide efforts to:

Resolution No. Page 2

- Encourage housing development proximate to job centers, which would in turn:
 - Reduce transit and transportation congestion, helping to alleviate long region wide commute times; and
 - Reduce greenhouse gas emissions, consistent with AB 32, SB 375 and the Metropolitan Transportation Commission's (MTC) Plan Bay Area 2050 policy framework.

ADOPTED by the City Council of the City of Pleasant Hill at a regular meeting held on the 14th day of September, 2020, by the following vote:

AYES:

Carlson, Flaherty, Harris, Noack, Rinn

NOES:

None

ABSENT:

None

ABSTAIN:

None

MATTHEW RINN, Mayor

ATTEST:

APPROVED AS TO FORM;

JANET E. COLESON, City Attorney



2221 Spyglass Lane, El Cerrito, CA 94530

August 7, 2020

Mayor Jesse Arreguin, Chair Association of Bay Area Governments Housing Methodology Committee 375 Beale Street, Suite 700 San Francisco, CA 94105

RE: Support for the Plan Bay Area 2050 Baseline Data Methodology

Chair Arreguin,

The Contra Costa Mayors Conference, representing all 19 cities in Contra Costa county, wishes to convey our appreciation for the Housing Methodology Committee's work on evaluating housing allocation methodologies for the next RHNA cycle (2023-2031).

We recognize that it is a daunting task, not only because of the collective recognition to provide more housing that is affordable to a wide range of income levels but also because we can't forget that *where* we distribute the 441,176 housing unit assignment by California Department of Housing and Community Development (HCD) to the Bay Area is just as important to the overall quality of life for all residents in the Bay Area.

In light of these considerations, the Contra Costa Mayors Conference supports and endorses the use of **Plan Bay Area 2050** as the baseline data methodology because it is consistent with the decades-long region-wide effort to:

- 1. Encourage housing development in proximity to jobs, which would in turn;
- 2. **Reduce transit and transportation congestion**, helping to alleviate long region wide commutes; and
- 3. **Reduce greenhouse gas emissions**, consistent with both AB 32 and SB 375.

It is of great concern to Contra Costa communities that the alternative "2019 Baseline Household" method would *reverse* the decades-long region-wide effort to reduce traffic congestion and GHG emissions through a greater jobs-housing balance. We appreciate your consideration of our perspective and recommendation.

Sincerely,

/Signed/

Gabriel Quinto, Conference Chair Contra Costa Mayors Conference

Contra Costa Mayors Conference Membership

City of Antioch

City of Oakley

City of Brentwood

City of Orinda

City of Clayton

City of Pinole

City of Concord

City of Pittsburg

Town of Danville

City of Pleasant Hill

City of El Cerrito

City of Richmond

City of Hercules

City of San Pablo

City of Lafayette

City of San Ramon

City of Martinez

City of Walnut Creek

Town of Moraga