REGIONAL HOUSING NEEDS ALLOCATION

Association of Bay Area Governments

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* **rhna@bayareametro.gov**

Jurisdiction Whose Allocation is Being Appealed: ___City of Pleasanton_____

Filing Party: O HCD   ⊗ Jurisdiction: ___City of Pleasanton_____

Contact Name: ___Ellen Clark_____   Title:___Director of Community Development___

Phone: ___925-931-5606_____   Email: ___eclark@cityofpleasantonca.gov___

APPEAL AUTHORIZED BY:

Name:___Nelson Fialho_____

Signature: [*Nelson Fialho* DocuSigned by: DCE615AC6E49470...]_____

Date: ___7/9/2021_____

PLEASE SELECT BELOW:
- O Mayor
- O Chair, County Board of Supervisors
- O City Manager
- ⊗ Chief Administrative Officer
- O Other: _____

IDENTIFY ONE OR MORE BASES FOR APPEAL [Government Code Section 65584.5(b)]

☒ ABAG failed to adequately consider information submitted in the Local Jurisdiction Survey regarding RHNA Factors (Government Code Section 65584.04(e)) and Affirmatively Furthering Fair Housing (See Government Code Section 65584.04(b)(2) and 65584(d)(5)):

- ☐ Existing and projected jobs and housing relationship.
- ☒ Sewer or water infrastructure constraints for additional development due to laws, regulatory actions, or decisions made by a provider other than the local jurisdiction.
- ☒ Availability of land suitable for urban development or for conversion to residential use.
- ☐ Lands protected from urban development under existing federal or state programs.
- ☐ County policies to preserve prime agricultural land.
- ☐ Distribution of household growth assumed for Plan Bay Area 2050.
- ☐ County-city agreements to direct growth toward incorporated areas of county.
- ☐ Loss of units contained in assisted housing developments.
- ☐ Households paying more than 30% or 50% of their income in rent.
- ☐ The rate of overcrowding.
- ☐ Housing needs of farmworkers.
- ☐ Housing needs generated by the presence of a university campus within a jurisdiction.
- ☐ Housing needs of individuals and families experiencing homelessness.
- ☐ Loss of units during a declared state of emergency from January 31, 2015 to February 5, 2020.
- ☐ The region's greenhouse gas emissions targets to be met by Plan Bay Area 2050.
- ☐ Affirmatively furthering fair housing.

☒ ABAG failed to determine the jurisdiction's Draft RHNA Allocation in accordance with the Final RHNA Methodology and in a manner that furthers, and does not undermine the RHNA Objectives (see Government Code Section 65584(d) for the RHNA Objectives).

☒ A significant and unforeseen change in circumstances has occurred in the local jurisdiction or jurisdictions that merits a revision of the information submitted in the Local Jurisdiction Survey (*appeals based on change of circumstance can only be made by the jurisdiction or jurisdictions where the change occurred*).

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 units requested to be reduced <u>or</u> added to jurisdiction's Draft RHNA Allocation:

⊗ Decrease   Number of Units: <u>1,193</u>   ○ Increase   Number of Units: _____

Brief description of appeal request and statement on why this revision is necessary to further the intent of the objectives listed in Government Code Section 65584(d) and how the revision is consistent with, and not to the detriment, of the development pattern in Plan Bay Area 2050. Please include supporting documentation for evidence as needed, and attach additional pages if you need more room.

The City of Pleasanton's appeal is based on the three criteria that are cited as a basis for appeal pursuant to Government Code Section 65584.05, specifically:

1) Local Planning Factors: That ABAG failed to adequately consider information previously provided by the City of Pleasanton with respect to local conditions affecting housing production, including: a) the availability of water supply to service future housing and b) the availability of land that may realistically be available for new residential development assumed within the RHNA methodology, particularly the conversion of existing commercially-zoned land currently occupied with retail, office and similar uses.

2) Methodology and Conformance with Statutory Objectives: That ABAG's Housing Methodology was flawed both in process and assumptions, particularly considering the unprecedented reliance on the yet-to-be adopted sustainable communities' strategy, the Plan Bay Area 2050 Blueprint; and which implementation through the RHNA will undermine key statutory objectives as set forth in Government Code Section 65584(d).

3) Change in Circumstances: That significant and unforeseen changes in local circumstances has occurred that supports revisions to the information previously submitted, with respect to City water supply, as well as trends driven by the COVID pandemic with respect to employment, travel and transit.

In addition to the above, the City's appeal sets forth our substantive concerns with the Regional Housing Needs Determination (RHND), from which the RHNA is ultimately derived. In combination with recently-adopted State laws that eliminate local discretion and CEQA review of housing projects, the environmental and community impacts of the "overcounting" of the housing need are extremely problematic.

Please see the attached supporting documentation, including a letter outlining the appeal, and supporting

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attachments, for additional information in support of the appeal.

List of supporting documentation, by title and number of pages

1. <u>RHNA Appeal Letter 7-08-21, 9 pages</u>

2. <u>RHNA Appeal Letter_Attachments A thru D, 30 pages</u>

3. _____

The maximum file size is 25MB. To submit larger files, please contact rhna@bayareametro.gov.

Click here to attach files

July 8, 2021

Regional Housing Needs Assessment Appeals Board
Association of Bay Area Governments
375 Beale Street, Suite 700
San Francisco, CA 94105

Dear Members of the RHNA Appeals Board:

On behalf of the City Council, and in accordance with Government Code Section 65584.05, the City of Pleasanton hereby submits this appeal to the Association of Bay Area Government (ABAG), of the Draft 6th Cycle Regional Housing Needs Assessment (RHNA), published May 21, 2021.

Our letter is divided into two parts:

- **Part I** specifically addresses the appeal of the RHNA Allocation, based on the criteria set forth in the Government Code and in ABAG's Appeal Procedures document.

- **Part II** addresses the City's substantive concerns with the Regional Housing Needs Determination (RHND), from which the RHNA is ultimately derived. In combination with recently-adopted State laws that eliminate local discretion and CEQA review of housing projects, the environmental and community impacts of the "overcounting" of the housing need are extremely problematic.

PART I: APPEAL OF RHNA ALLOCATION

The City of Pleasanton's appeal is based on the three criteria that are cited as a basis for appeal pursuant to Government Code Section 65584.05, specifically:

1) Local Planning Factors: That ABAG failed to adequately consider information previously provided by the City of Pleasanton with respect to local conditions affecting housing production, including: a) the availability of water supply to service future housing and b) the availability of land that may realistically be available for new residential development assumed within the RHNA methodology, particularly the conversion of existing commercially-zoned land currently occupied with retail, office and similar uses.

P.O. Box 520, Pleasanton, CA 94566-0802   **123 Main Street**

City Manager	**City Attorney**	**Economic Development**	**City Clerk**
(925) 931-5002	(925) 931-5015	(925) 931-5038	(925) 931-5027
Fax: 931-5482	Fax: 931-5482	Fax: 931-5485	Fax: 931-5492

2) Methodology and Conformance with Statutory Objectives: That ABAG's Housing Methodology was flawed both in process and assumptions, particularly considering the unprecedented reliance on the yet-to-be adopted sustainable communities' strategy, the Plan Bay Area 2050 Blueprint; and which implementation through the RHNA will undermine key statutory objectives as set forth in Government Code Section 65584(d).

3) Change in Circumstances: That significant and unforeseen changes in local circumstances has occurred that supports revisions to the information previously submitted, with respect to City water supply, as well as trends driven by the COVID pandemic with respect to employment, travel and transit.

Bases for Appeal: Supporting Evidence for Revisions to City of Pleasanton RHNA Allocation

1) Criterion 1:   ABAG failed to adequately consider information submitted in the Local Jurisdiction Survey pursuant to the following:

a) Government Code Section 65584.04(e)(2)(A): Sewer or water infrastructure constraints for additional development due to laws, regulatory actions, or decisions made by a provider other than a local jurisdiction.

The City faces a significant constraint with respect to water supply for both existing and new development. In February 2020, at the time of the Local Conditions Survey, the City had recently learned of contamination from Per- and Polyfluoroakly substances (PFAS) in local drinking water supplies. This constraint has the potential to be significantly worsened by projected drought conditions in the State and the region.

The State of California Division of Drinking Water (DDW) has begun efforts to more closely regulated two classes of PFAS, Perfluorooctanoic acid (PFOA) and Perfluorooctanesulfonic acid (PFOS), including an order issued in the second quarter of 2019 requiring local water agencies to initiate testing of groundwater for PFAS.   Based on testing completed by the City, all the City's three groundwater wells, which together provide 20 percent of the City's groundwater supplies, were found to have PFAS contamination substantially above the Notification Level for PFOS, and one well (Well 8), above the (more significant) Response Level for both PFOS and PFOA. As a result, Well 8 has been taken off-line, while the City completes study of treatment options. The State is currently reviewing other PFAS for possible regulation, with the outcomes of this effort and potential effects on groundwater supplies to be determined.

A May 2021 study completed by the City estimates that it will cost upwards of $46 Million to install the necessary treatment facilities to allow Well 8 to come back on-line; this cost includes essential upgrades to all three the City's wells and related distributions systems, necessary to provide reliable supply into the future. How these significant capital and ongoing operations and

maintenance costs will be paid for is yet to be determined; and, at the earliest, capital improvements would not be complete until 2025, and possibly longer if funding proves difficult to secure.

The City has explored other alternatives, including purchase of additional supply from the Zone 7 water agency that currently supplies the other 80 percent of Pleasanton's drinking water supply. However, doing so incurs its own set of significant costs and constraints, and there is no guarantee that these alternative supplies would be available to the City. Zone 7 itself is required to remediate PFAS in some of its groundwater wells, a constraint on its supply and ability to further supply potable water to the City of Pleasanton and other agencies.

Furthermore, the City recently adopted an Urban Water Management Plan (UWMP) for the period 2020-2040, which, although concluding there would be adequate water supply available to serve the City's estimated population (including incremental growth associated with the Housing Element and RHNA), it warns of significant uncertainty around such supplies. Zone 7, which as noted supplies the majority of our potable water supply, faces challenges including declining reliability from imported water sources (principally from the State Water Project (SWP)), and from its local sources. In recent years, actual annual allocations from the SWP have been less than the maximum contracted amount, with assumptions in the 2019 SWP Delivery Capability Report estimating actual deliveries at 59 percent of the maximum contract amount; and 54 percent in 2040. Zone 7 is pursuing several projects to address potential future supply deficits as SWP reliability declines and Zone 7's service population grows. However, these are major projects that are regional and super-regional in scope and scale, and ambitious and costly, with numerous steps involved to study, plan, and construct over years and even decades.

In combination with the Governor's recently-declared drought emergency, and the above current and pending uncertainties around water supply, the prospect of accommodating close to 6,000 new housing units as specified in the RHNA is problematic.

b) Government Code Section 65584.04(e)(2)(B): Availability of land suitable for urban development or for conversion to residential use.

In the local conditions survey, the City broadly identified the lack of vacant land as a constraint to the production of housing; and identified constraints in re-purposing existing commercial properties in the vicinity of transit. This strategy is a key focus of Plan Bay Area 2050 and of the RHNA methodology. Although the City acknowledges opportunities for infill, for example, on existing parking lots that service retail and office centers, and the value in attempting to focus growth near transit, the methodology fails to account for real world constraints and feasibility, including the presence of viable existing uses, high costs to acquire such sites, and construction costs. Infrastructure, circulation, and impacts to local services such as neighborhood schools also make it impractical and undesirable to concentrate all of this new growth in such a limited area.

Plan Bay Area's mapping of Growth Geographies in Pleasanton show these areas encompassing two Transit Priority Areas (the immediate half mile around the two BART stations that lie at the far north end of the City), and the Hacienda business park, a "potential" Priority Development Area (PDA). The entirety of this area, exclusive of Right-of-Way, schools and parks, existing high density residential development, and recently developed/redeveloped commercial properties amounts to approximately 684 acres. Assuming a relatively high average density of 40 dwelling units per acre, close to 150 acres would need to be developed or redeveloped to satisfy the City's assigned RHNA. It is simply not realistic to assume that 20 to 25 percent of all properties would redevelop in these areas over the 8-year Housing Element period, given that the majority of this area is developed with viable commercial and retail uses, and points to the flawed assumptions in the Plan Bay Area growth modeling upon which the RHNA methodology is constructed.

ABAG provides mapping in its May 2021 Draft Plan Bay Forecasting Modeling Report[1] (See Attachment A) that appears to show thousands of units worth of residential development capacity within publicly-owned lands, and thousands more units assumed to be yielded from Mall/Office Park Conversions. As daunting as the City's illustrative allocations appeared at the close of the HMC process in Fall of 2020, the latter stages of the RHNA process resulted in Pleasanton's illustrative RHNA allocation increasing by over 25 percent, to the current Draft of 5,965 units. This late change was apparently based on a series of amendments in Plan Bay Area that eliminated policies to strongly disincentivize jobs-focused growth in the South Bay, and to shift a larger number of housing units from the South Bay elsewhere, including Pleasanton, on the supposed basis of the availability of public lands and redevelopment opportunities on commercial properties in those places.

As described, we believe these assumptions to be seriously flawed, yet no meaningful opportunity was provided for examination of the realistic capacity assumed within Plan Bay Area's modeling under the revised growth scenarios. The Forecasting Modeling Report indicates these additions to have been made via a "Scheduled Development Events Model" input to the UrbanSim 2 model, essentially a manual input of forecast growth for particular geographies and parcels, that would have allowed for selective allocation of new housing growth to certain communities versus others. This key element of the methodology, the most significant share of the overall allocation, went largely unexamined, and appears to have been deployed selectively and without any consideration of the feasibility of such projects, infrastructure constraints, or community impacts.

The impracticality of this approach is illustrated in just two examples:

> 1) One of the more significant theoretical development opportunities is housing on land owned by BART. BART, in its August 2020 Transit-Oriented Development Program

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[1] https://www.planbayarea.org/sites/default/files/documents/2021-05/Draft_PBA2050_Forecasting_Modeling_Report_May2021.pdf

Work Plan, identified the Pleasanton area BART stations as a low priority for investment in housing-focused projects (both BART stations are identified as priorities for commercial, not residential, development (See Attachment B), meaning that a significant policy shift would have to occur at BART in order to bring these sites on-line during the RHNA planning period. ABAG's planning priorities, unfortunately, do not mesh with those of the key regional agencies whose participation will be critical to actually produce housing during the next eight years.

2) The challenges to redeveloping of existing commercially-zoned properties are evidenced with the performance of one of the City's Cycle 4 and 5 sites, at California Center, which despite being re-zoned for high density housing and receiving an entitlement for development in 2016, has yet to proceed with construction.

In light of the above, the presumption that a large number of such sites will redevelop over the next eight years is overly optimistic, particularly with respect to the limited number of such opportunity sites that have proximity to high-quality transit, such as BART.

Finally, the methodology fails to consider feasibility in other respects. The City of Pleasanton's RHNA allocation includes 2,758 low- and very-low income units. Historically in Pleasanton, as we believe to be the case in many communities, the majority of lower-income units have been achieved through use of the City's Inclusionary Zoning Ordinance (IZO), which mandates that 15% of units in multi-family projects be dedicated as affordable to very-low and low-income households. On the basis of this ratio, close to 18,400 units total units would need to be permitted and constructed, to meet the RHNA allocation for lower-income units.

2) Criterion 2: ABAG failed to determine the jurisdiction's Draft RHNA Allocation in accordance with the Final RHNA Methodology and in a manner that furthers and does not undermine the RHNA Objectives (see Government Code Section 65584(d) for the RHNA Objectives).

The RHNA Methodology was developed over an approximately 2-year period, including close to a year of process working with the Housing Methodology Committee, and then proceeding through review by ABAG subcommittees and the Executive Board. Pleasanton staff was among the representatives to the HMC, and thus had an unparalleled opportunity to witness the development of the methodology firsthand. Despite the countless hours spent developing and refining the various factors that were inputs to the process, the biggest single input to the methodology has proven to be the initial distribution of housing units (the Baseline distribution) made on the basis of future household numbers as projected by Plan Bay Area 2050. As a participant in the process, it was evident that this factor was a source of significant questions and confusion among those being asked to "choose" the proposed baseline, but, more critically, that those numbers were in flux during, and beyond, the conclusion of the HMC process.

Nonetheless, through careful scrutiny of the data, the failings of the baseline choice became evident. In a series of comment letters (Attachment C), the City of Pleasanton, along with neighboring Tri-Valley Cities, laid out strong objections to the proposed baseline on the basis that it would undermine, versus support regional planning goals that are also reflected in the RHNA Statutory Objectives.

In particular, while acknowledging the important equity and fair housing goals that are integral to certain of the statutory objectives, and which underlie much of the methodology, we believe these objectives have been overemphasized at the expense of other objectives. Specifically, the methodology contradicts and impedes the attainment of certain aspects of the following Statutory Objectives:

- Objective 2) to promote…" the protection of environmental and agricultural resources, the encouragement of efficient development patterns, and the achievement of the region's greenhouse gas reductions targets..." and

As outlined in our various comment letters the methodology would significantly underallocate housing to the South Bay, particularly Santa Clara County, resulting in significantly higher allocations to other counties, rural areas, small cities, and suburban communities. Whereas the methodology assigns 29 % of total RHNA to Santa Clara County, Plan Bay Area's projected growth for the County is 33 %. This underallocation is significant in consideration of the extraordinary jobs growth seen in Santa Clara County in the past decade, but also in its contribution to longer commutes, development at the outer fringes of the region that are poorly served by transit and in largely auto-dependent communities.

On a macro scale, the resultant pattern undermines Statutory Objective 2 in contributing to increased congestion and Vehicle Miles Travelled (VMT). Indeed, the recent Draft EIR for Plan Bay Area 2050 finds a significant and unavoidable VMT impact based on an acknowledged lack of certainty in local jurisdictions' ability to implement Transportation Demand Management (TDM) and other mitigation. In Pleasanton, recently-released mapping by Alameda County Transportation Commission (ACTC) shows most of the city as being within the highest VMT per capita categories. (Attachment D). As discussed in Criteria 1, it is not realistic for most of the new housing development to be assumed to occur within the limited area that is near the two BART stations, which correlates to those areas designated as having low per capita VMT. In practice, available sites to accommodate this significant RHNA are going to need to be found throughout the City, not just in low-VMT areas. This will almost certainly generate significant and unavoidable VMT and GHG emissions impacts. While problematic enough for Pleasanton, in isolation, it is a scenario likely to be seen in many other Bay Area communities and a serious an unexamined real world impact from a cumulative impact standpoint. The Methodology is misguided, and in contradiction to Statutory Objective No. 2.

3) Criterion 3: Change in Circumstances

The City of Pleasanton also notes several circumstances that have changed since early 2020, and which were not considered in the RHNA Methodology.

a) Changed Circumstance: Water Supply. This letter describes, in Criterion 1, the challenges faced by the City related to water supply. This issue and the City's understanding of the severity and significant obstacles faced in addressing the PFAS issue have evolved since completion of the local conditions survey – it is now clear that the cost of investments needed to address PFAS pose an even more significant constraint to water supply than initially thought. This changed circumstance is compounded by the recent drought declaration made by the Governor, signaling a potential return to multiple years of diminished water supply and restrictions for existing water users.

b) Changed Circumstance: Population Decrease. Initial results from the US Census were recently published, indicating the lowest rate of population growth nationwide since the 1930's. And the COVID pandemic and other factors appear to be driving population numbers down within the Bay Area and the State, including in Pleasanton where recent Department of Finance Data indicates a decrease in Pleasanton's population by 0.4% between January 2020 and January 2021.

c) Changed Circumstance: Jobs and Transportation Patterns. Another change resulting from the COVID pandemic has been the decline in workers using mass transit, as well as the accelerated transition to telecommuting. Although recovery from COVID is occurring and gaining pace since vaccines became more widely available this spring, experts believe that many of these changes will be long-lasting. Both Plan Bay Area, and the RHNA methodology were built on pre-pandemic assumptions about travel patterns, access to jobs, and transit ridership that have been fundamentally altered by COVID and therefore need to be re-assessed.

Requested Reduction in RHNA, based on Appeal Factors Cited

The City of Pleasanton is requesting a reduction in our RHNA by 20% (1,193 units), to a new total of 4,473 units. The request is based on what we believe to be the two most significant oversights in application of the methodology 1) Failure to account for the increased uncertainty around water supplies that represent at least 20 percent of the City' potable supply; and 2) land supply constraints that were overlooked or exacerbated in the final stages of the Plan Bay Area 2050 Blueprint process, and which increased the City's allocation at that time by 1,178 units, 25 percent over the illustrative allocation presented at the conclusion of the HMC process and endorsed as Option 8A by the ABAG Executive Board.

PART II: CONCERNS WITH REGIONAL HOUSING NEEDS DETERMINATION AND RELATED LOCAL AND REGIONAL IMPACTS

This portion of our letter outlines significant concerns regarding the broader Regional Housing Needs Determination. Specifically, we point to the concerns raised by a growing number of California jurisdictions, questioning the methodology and assumptions underlying the State Department of Housing and Community Development allocation of 441,996 units to Bay Area. Similar concerns have been raised by the Southern California Association of Governments (SCAG), with respect to SCAG's 1.34 Million unit RHND.

We believe it imperative that that the RHND methodology and assumption should be closely reviewed for accuracy, since the significance of any overcount is magnified by the repercussions of implementing Housing Elements that will result in real-world zoning changes in communities throughout the Bay Area. Zoning sites for housing unlocks a potent combination of ministerial and streamlined approvals allowed under recent laws like SB35 and SB330. This streamlining can be coupled with CEQA exemptions and density bonus laws that allow for huge inflations of height and density over even substantially increased base densities, amplifying negative environmental effects, at the same time the power of local jurisdictions to mitigate or manage impacts is stripped away.

While we recognize that the RHNA process is, itself, exempt from CEQA review, Plan Bay Area 2050, whose Blueprint dictates the bulk of the RHNA distribution, currently has its CEQA process underway. The recently published Draft EIR finds no fewer than 24 Significant and Unavoidable environmental impacts, in areas as diverse as aesthetics, air quality, agricultural resources, hazards, transportation/VMT, and public utilities. As individual jurisdictions complete CEQA review of their individual housing elements, a similar array of significant and unavoidable issues will inevitably arise. Chief among these, and, in our view, unreconcilable with other key Statewide planning goals around transportation and the environment, is the unmitigable increase in VMT per capita associated with placing large amounts of new housing in communities poorly served by transit – regardless of the significant "wishful thinking" present in Plan Bay Area 2050 and similar regional plans around the ability of TDM and similar measures to meaningfully reduce VMT in transit poor and auto-dependent jurisdictions. The fact that CEQA exemptions for individual projects further reduce the ability to require mitigations, only exacerbates the problem.

The individual and cumulative effects of the land use changes dictated by Plan Bay Area 2050, and by the RHNA allocations cannot be ignored, and must be reconciled with the equally important goals of the State, beyond housing mandates, to protect the environment.
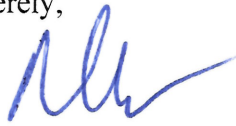
CONCLUSION

Based on the analysis provided herein, and pursuant to Government Code Section 6655.84.05(b), the City of Pleasanton hereby appeals the Draft RHNA for the City, revisions to which are necessary to take account of local conditions and changed circumstances since the local

conditions survey was complete, and to further the intent of the RHNA statutory objectives. We respectfully request the total allocation be revised downwards, by 1,193 units to a new total of 4,473 units, distributed in similar proportion to the Draft RHNA across various income categories.

Although outside of the narrow scope prescribed among the bases for appeal, we also appreciate the opportunity to bring forth our concerns regarding the RHND, and the significant, real world consequences the sweeping zoning changes needed to accommodate this overstated number, will bring to the Bay Area and the State.

Sincerely,

Nelson Fialho, City Manager
City of Pleasanton

cc.   Mayor and City Council

Attachments:

Attachment A.   Draft Plan Bay Forecasting Modeling Report, Figures 15 and 16
Attachment B.   BART's Transit-Oriented Development Program Work Plan, Public Review Draft August 2020, Figure 5
Attachment C.   Comment Letters on Draft RHNA Methodology from City of Pleasanton, Tri-Valley Cities, and Alameda County Mayor's Conference
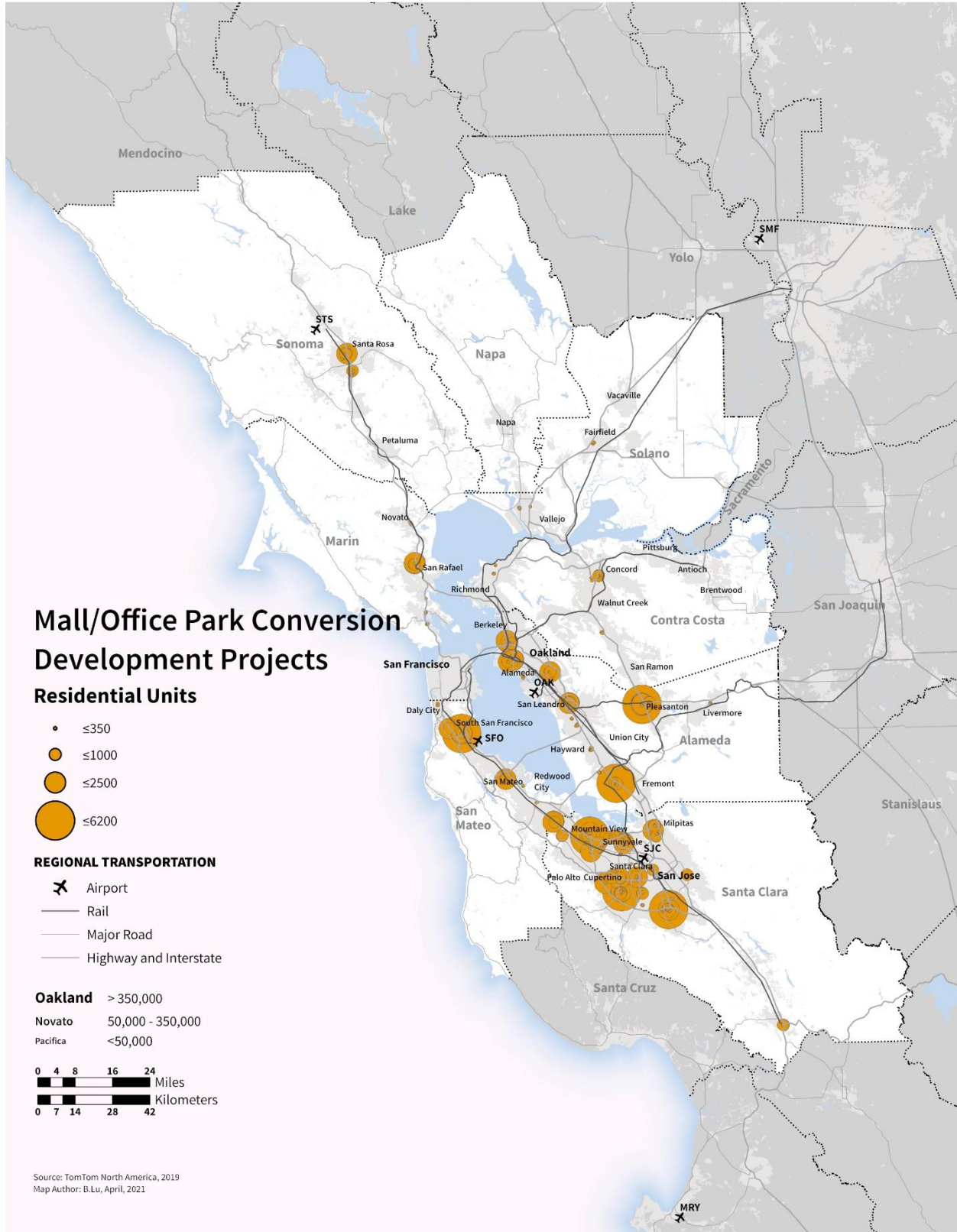Attachment D.   Alameda County Transportation Commission, VMT mapping for Eastern Alameda County
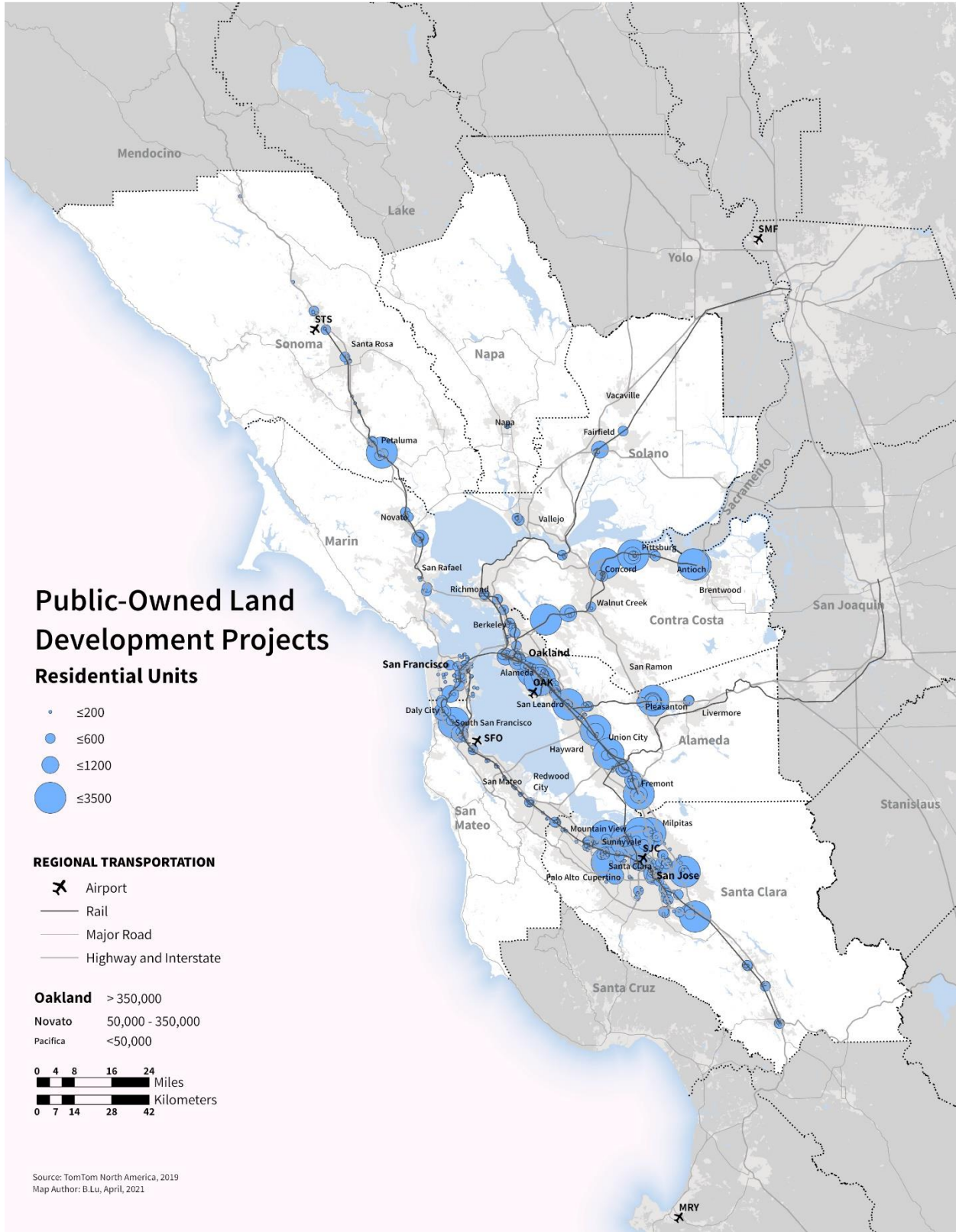
Mall/Office Park Conversion Development Projects

Residential Units

- ≤350
- ≤1000
- ≤2500
- ≤6200

REGIONAL TRANSPORTATION

✈ Airport
Rail
Major Road
Highway and Interstate

Oakland > 350,000
Novato 50,000 - 350,000
Pacifica <50,000

0 4 8 16 24
Miles
Kilometers
0 7 14 28 42

Source: TomTom North America, 2019
Map Author: B.Lu, April, 2021

Figure 15. Mall/Office Park Conversion Development Projects

**Public-Owned Land
Development Projects**

Residential Units

- ≤200
- ≤600
- ≤1200
- ≤3500

REGIONAL TRANSPORTATION

- ✈ Airport
- —— Rail
- —— Major Road
- —— Highway and Interstate

Oakland > 350,000

Novato 50,000 - 350,000

Pacifica <50,000

Source: TomTom North America, 2019
Map Author: B.Lu, April, 2021

Figure 16. Public-Owned Land Development Projects

Figure 5: Sites BART will Partially or Fully Reserve for Job-Generating Uses and Prioritize for Affordable Housing
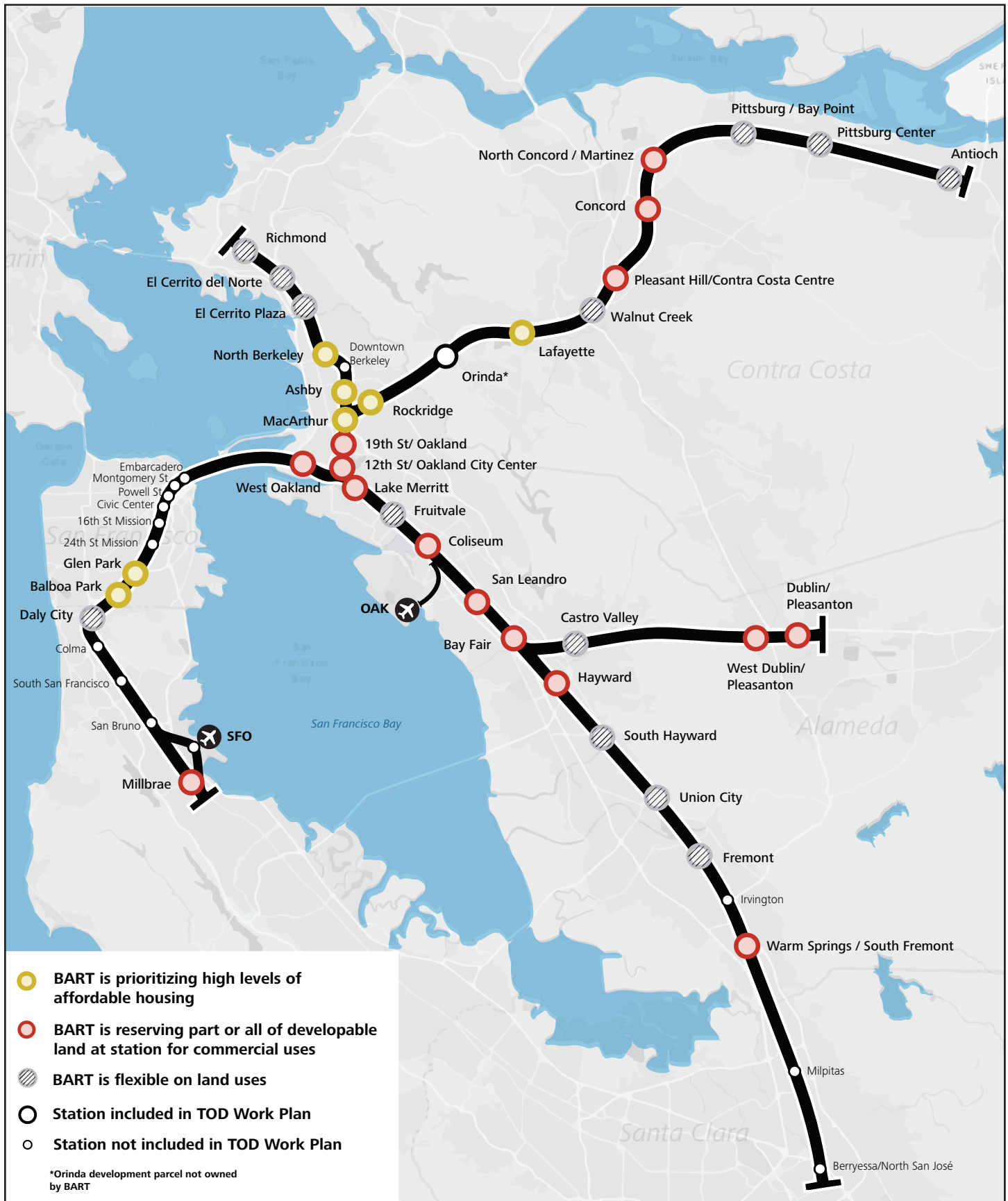
Tri-Valley Cities
DANVILLE • DUBLIN • LIVERMORE • PLEASANTON • SAN RAMON

September 14, 2020

Mayor Jesse Arreguín, President
Association of Bay Area Governments, Executive Board
375 Beale Street, Suite 700
San Francisco, CA 94105-2066

Dear Board President Arreguín:

On behalf of the Tri-Valley cities of Danville, Dublin, Livermore, Pleasanton, and San Ramon, we are writing to express our concern about the methodology options that will be considered by the Housing Methodology Committee on September 18.

The Tri-Valley Cities (TVC) appreciate the urgency of the statewide housing crisis and the responsibility of local jurisdictions to address this important issue. Each of our five cities has taken significant steps over recent years to facilitate the construction of both market-rate and affordable housing – evidenced by the construction of more than 10,300 new housing units since the start of the last Housing Element cycle – these efforts have made the Tri-Valley one of the fastest-growing regions in the Bay Area and the State. Through dedicated affordable housing projects, application of inclusionary ordinances, and policies to encourage ADUs, we have also made progress towards fulfilling our affordable housing needs, although, as has been experienced by most cities, the lack of funding for lower-income housing continues to present a significant challenge.

We very much appreciate the efforts and dedication of the HMC in addressing the significant challenges presented by the upcoming 6th Cycle RHNA process. Although we commend the HMC's prior decision to utilize the Plan Bay Area 2050 Households Baseline in the methodology, we would urge reconsideration of the currently proposed methodologies and factors, in order to more appropriately balance the RHNA Statutory Objectives identified in State Law including equity and fair housing goals, as well as those related to efficient growth patterns and GHG reductions.

Methodology options 5A and 6A that will be under consideration by the HMC on September 18, have significant flaws. In particular, both place a disproportionate emphasis on factors that allocate RHNA to high opportunity areas, without consideration of the negative consequences of the resultant land use patterns. The following points reflect our specific concerns regarding the proposed methodology options:

- The options do not adequately address factors related to transit and jobs proximity, and fail to take into account the lack of high-quality transit within the Tri-Valley, and distance from the major employment centers of the South Bay, Oakland, and San Francisco. The methodologies allocate growth in a manner that will promote auto dependency and longer commute times, exacerbate GHG impacts, and run counter to the goals and objectives well-formulated and strongly articulated in the recently released Plan Bay Area Blueprint. This is also counter to RHNA Statutory Objective 2: Promoting infill

Tri-Valley Cities

DANVILLE • DUBLIN • LIVERMORE • PLEASANTON • SAN RAMON

development and socioeconomic equity, the protection of environmental and agricultural resources, and the encouragement of efficient development patterns.
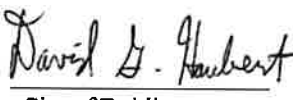
- The options push significant housing allocations into the outer ring of Bay Area suburbs, including the Tri-Valley, exacerbating the jobs/housing imbalance, and compelling long commutes to distant jobs centers. Even in our relatively jobs-rich Tri-Valley cities, data shows that many of our residents, today, commute significant distances to work. This comes at a significant cost: not just in negative environmental consequences, but as time spent away from families, and a further strain on household finances, particularly for lower-income households.

- Our smaller cities have limited land area and sites that are candidates for re-zoning. Significant RHNA allocations may have the unintended consequence of causing speculative increases in land values, and create pressure to develop agricultural and open space lands, areas subject to natural hazards, and other sensitive resources.

Given these concerns, we would urge the Executive Board to reject the current options 5A and 6A, and consider methodology options that emphasize factors and factor weightings that 1) focus housing allocations in areas most proximate to the highest concentrations of jobs, and particularly where jobs growth has outpaced recent housing production (e.g jobs proximity factors); 2) provide realistic allocations that take account of geographic and other constraints to housing development (e.g. urbanized land area factors); and 3) provide residents with access to viable transit and transportation options that do not add to regional congestion, commute times, and household transportation costs (e.g. transit proximity factors).
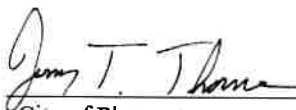
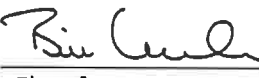Thank you for your consideration of these important concerns.

Respectfully,

Town of Danville
Mayor Karen Stepper

City of Dublin
Mayor David Haubert

City of Livermore
Mayor John Marchand

City of Pleasanton
Mayor Jerry Thorne

City of San Ramon
Mayor Bill Clarkson

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Tri-Valley Cities

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September 14, 2020

Mayor Jesse Arreguín, Chair
Housing Methodology Committee
Association of Bay Area Governments
375 Beale Street, Suite 700
San Francisco, CA 94105-2066

Dear Chair Arreguín:

On behalf of the Tri-Valley cities of Danville, Dublin, Livermore, Pleasanton, and San Ramon, we are writing to express our concern about the methodology options that will be considered by the Housing Methodology Committee on September 18.

The Tri-Valley Cities (TVC) appreciate the urgency of the statewide housing crisis and the responsibility of local jurisdictions to address this important issue. Each of our five cities has taken significant steps over recent years to facilitate the construction of both market-rate and affordable housing – evidenced by the construction of more than 10,300 new housing units since the start of the last Housing Element cycle – these efforts have made the Tri-Valley one of the fastest-growing regions in the Bay Area and the State. Through dedicated affordable housing projects, application of inclusionary ordinances, and policies to encourage ADUs, we have also made progress towards fulfilling our affordable housing needs, although, as has been experienced by most cities, the lack of funding for lower-income housing continues to present a significant challenge.

We very much appreciate the efforts and dedication of the HMC in addressing the significant challenges presented by the upcoming 6th Cycle RHNA process. Although we commend the HMC's prior decision to utilize the Plan Bay Area 2050 Households Baseline in the methodology, we would urge reconsideration of the currently proposed methodologies and factors, in order to more appropriately balance the RHNA Statutory Objectives identified in State Law including equity and fair housing goals, as well as those related to efficient growth patterns and GHG reductions.

Methodology options 5A and 6A that will be under consideration by the HMC on September 18, have significant flaws. In particular, both place a disproportionate emphasis on factors that allocate RHNA to high opportunity areas, without consideration of the negative consequences of the resultant land use patterns. The following points reflect our specific concerns regarding the proposed methodology options:

- The options do not adequately address factors related to transit and jobs proximity, and fail to take into account the lack of high-quality transit within the Tri-Valley, and distance from the major employment centers of the South Bay, Oakland, and San Francisco. The methodologies allocate growth in a manner that will promote auto dependency and longer commute times, exacerbate GHG impacts, and run counter to the goals and objectives well-formulated and strongly articulated in the recently released Plan Bay

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Area Blueprint. This is also counter to RHNA Statutory Objective 2: Promoting infill development and socioeconomic equity, the protection of environmental and agricultural resources, and the encouragement of efficient development patterns.
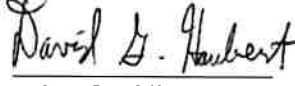
- The options push significant housing allocations into the outer ring of Bay Area suburbs, including the Tri-Valley, exacerbating the jobs/housing imbalance, and compelling long commutes to distant jobs centers. Even in our relatively jobs-rich Tri-Valley cities, data shows that many of our residents, today, commute significant distances to work. This comes at a significant cost: not just in negative environmental consequences, but as time spent away from families, and a further strain on household finances, particularly for lower-income households.

- Our smaller cities have limited land area and sites that are candidates for re-zoning. Significant RHNA allocations may have the unintended consequence of causing speculative increases in land values, and create pressure to develop agricultural and open space lands, areas subject to natural hazards, and other sensitive resources.

Given these concerns, we would urge the Committee to reject the current options 5A and 6A, and consider methodology options that emphasize factors and factor weightings that 1) focus housing allocations in areas most proximate to the highest concentrations of jobs, and particularly where jobs growth has outpaced recent housing production (e.g jobs proximity factors); 2) provide realistic allocations that take account of geographic and other constraints to housing development (e.g. urbanized land area factors); and 3) provide residents with access to viable transit and transportation options that do not add to regional congestion, commute times, and household transportation costs (e.g. transit proximity factors).
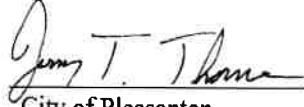
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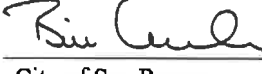
Respectfully,

Town of Danville
Mayor Karen Stepper

City of Dublin
Mayor David Haubert

City of Livermore
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October 8, 2020

Mayor Jesse Arreguin, President
Executive Board, Association of Bay Area Governments
375 Beale Street, Suite 700
San Francisco, CA 94105

Dear Mayor Arreguin:

On behalf of the Tri-Valley Cities of Danville, Dublin, Livermore, Pleasanton and San Ramon, we once again want to thank you and express our appreciation for your work on the 6th Cycle RHNA process, and to develop a methodology that appropriately and fairly distributes the 441,176 unit RHND recently allocated to the Bay Area by the State Department of Housing and Community Development (HCD).

On September 18, 2020, the Housing Methodology Committee voted to adopt methodology "Option 8A" that utilizes the "Plan Bay Area 2050 Future Households" Baseline; and applies a series of Factors that adjust the Baseline allocation, with a strong equity focus ("Access to High Opportunity Areas"), and secondarily, jobs proximity, with the greatest weight given to jobs accessible by auto.

The Tri-Valley Cities have significant concerns with the HMC's recommendation, particularly that it would have several negative outcomes in terms of its resultant distribution of housing growth, inconsistent with Plan Bay Area and key regional planning goals.

For Option 8A, these include housing allocations to Santa Clara County that fall far short of those projected in Plan Bay Area, and that fail to match the explosive jobs growth in the County over the past decade. And, significantly, we conclude the RHNA distribution resulting from Option 8A will work against key regional planning goals, including those to address GHG emissions by placing housing near jobs and transit centers, instead driving growth outwards, perpetuating sprawl and inefficient growth patterns.

As result, we would urge the Executive Board to consider an Alternative Methodology that 1) Uses the 2050 Household Growth Baseline; and 2) makes additional refinements to the Factors to allow for greater emphasis on transit and jobs access, while still maintaining an equity focus.

Impacts of HMC Recommended Methodology
A letter was submitted by the Contra Costa Mayors Association on October 2, 2020, outlining some very significant impacts of the proposed Baseline methodology, and contrasting it with the alternative "2050 Plan Bay Area Growth Baseline" that was dismissed with limited analysis during the HMC process.

We have reviewed and concur with all of the points raised in the Contra Costa County letter, including, as noted, that the Baseline would significantly under allocate new housing to Santa

Clara County, resulting in significantly higher allocations to other counties. This means that the methodology fails to adequately address the significant jobs-housing imbalance in Santa Clara County caused by its recent extraordinary jobs growth. In contrast to Plan Bay Area, which anticipates a 42% increase in housing growth in Santa Clara, the methodology assigns only 32% of the RHND there. This amounts to over 40,000 units allocated elsewhere in the region – most problematically, to our outer suburbs, small cities, and rural and unincorporated county areas.

The Contra Costa letter highlights some of the inequitable and unrealistic distributions to smaller cities across the region. In Danville, here in the Tri-Valley, the difference would amount to over 1,800 units, a more than 700% difference from the 2050 Growth Baseline. Similarly, large disparities are seen in other small cities.

Although the HMC's Option 8A provides an emphasis on equity and fair housing that is vitally important, we believe the unintended consequences of the growth patterns dictated by Option 8A may actually work against equity goals by:

- Inadequately addressing jobs-housing imbalances in the region requiring people to travel long distances from where they live to where they work.

- Driving growth from cities that want and need new housing to serve their communities and support their local economies.

- Underemphasizing transit access, thus increasing auto reliance for daily commutes and activities – at a significant economic, social and environmental cost to those residents.

Recommended Alternative Baseline and Factors

Similar to the approach advocated by Contra Costa County, we would urge the Executive Board to consider an Alternative to Option 8A, that shifts to use the "Plan Bay Area 2050 Growth" Baseline. We would also seek further refinements to the Factors as follows:

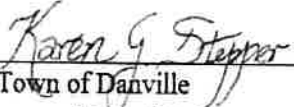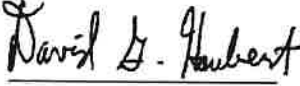|	HMC Option 8A	Proposed Alternative Methodology
Baseline	Plan Bay Area 2050 Households	Plan Bay Area 2050 Growth
Factors and Weighting		
Very-Low and Low Income Units	• 70 % Access to High Opportunity Areas • 15 % Jobs Proximity – Auto • 15 % Jobs Proximity - Transit	• 60 % Access to High Opportunity Areas • 20 % Jobs Proximity – Auto • 20 % Jobs Proximity - Transit
Moderate and Above Moderate Income Units	• 40 % Access to High Opportunity Areas • 60 % Jobs Proximity Auto	• 20 % Access to High Opportunity Areas • 40 % Jobs Proximity - Auto • 40 % Jobs Proximity - Transit

Together, these changes would have the following beneficial outcomes for the region, each of which would improve its consistency with Plan Bay Area:
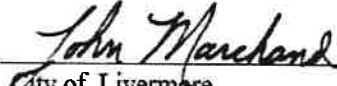
- **Increased share of RHNA to the "Big Three" cities and inner Bay Area**, and a corresponding decrease in that assigned to the outer Bay Area, unincorporated, and small and rural communities by approximately 30,000 units. This will ensure that that the largest share of housing growth is allocated to the region's biggest job centers, in areas well-served by transit and infrastructure.

- **Reduced allocation to unincorporated county areas by over 10,500 units** — avoiding further residential growth pressures in areas most subject to natural hazards, lack of infrastructure capacity, and threatened loss of agricultural and open space land.

- **Alignment of the share of housing growth in Santa Clara County to match Plan Bay Area 2050 and the County's significant jobs growth of the past decade.** Santa Clara, home of some of the region's largest tech firms, has the largest numeric deficit in housing production to jobs production over the past decade, which could be corrected in part by this adjustment.

We appreciate the opportunity to bring forward this Alternative Methodology, and request that the Executive Board be provided an opportunity to duly consider this alternative in their forthcoming deliberations on the RHNA Methodology.

Respectfully,

Town of Danville
Mayor Karen Stepper

City of Dublin
Mayor David Haubert

City of Livermore
Mayor John Marchand

City of Pleasanton
Mayor Jerry Thorne

City of San Ramon
Mayor Bill Clarkson

Attachments:
1. Map and Chart of County-by-County Allocations under Option 8A and Alternative Methodology
2. Summary of Jurisdiction-Specific Allocations

Map of the San Francisco Bay Area counties showing Percentage of RHND.
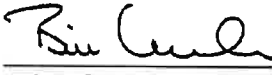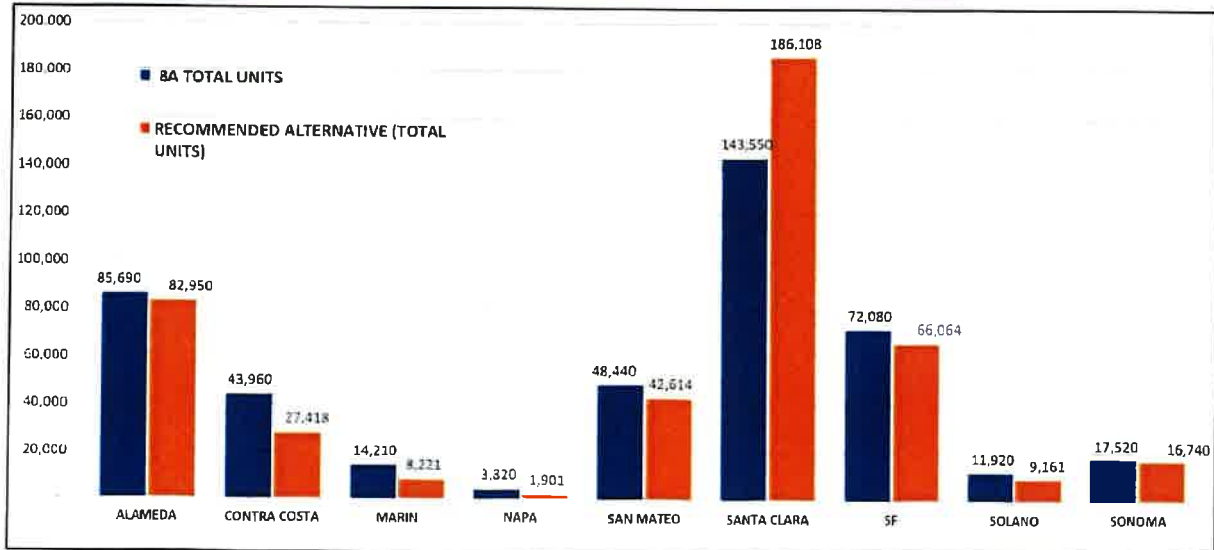
Percentage of RHND	
X %	HMC Option 8A
X %	Alternative Methodology

County percentages (HMC Option 8A / Alternative Methodology):
- SONOMA: 4% / 4%
- NAPA: 1% / 0.5%
- SOLANO: 3% / 2%
- MARIN: 3% / 1.5%
- CONTRA COSTA: 10% / 6%
- SAN FRANCISCO: 16% / 15%
- ALAMEDA: 19% / 19%
- SAN MATEO: 11% / 10%
- SANTA CLARA: 32% / 42%

Bar chart: 8A TOTAL UNITS vs RECOMMENDED ALTERNATIVE (TOTAL UNITS)

County	8A Total Units	Recommended Alternative
ALAMEDA	85,690	82,950
CONTRA COSTA	43,960	27,418
MARIN	14,210	8,221
NAPA	3,320	1,901
SAN MATEO	48,440	42,614
SANTA CLARA	143,550	186,108
SF	72,080	66,064
SOLANO	11,920	9,161
SONOMA	17,520	16,740

Attachment 2

County	City	HMC OPTION 8A (PBA 2050 Total Household Baseline)	ALTERNATIVE METHODOLOGY (PBA 2050 Growth Baseline + Revised Factors)	EFFECT OF CHANGE	% Change	
	JURISDICTION					
	Alameda	4,900	3,252	(1,648)	-34%	↓
	Albany	1,150	405	(745)	-65%	↓
	Berkeley	7,730	4,690	(3,040)	-39%	↓
	Dublin	3,630	3,758	128	4%	↑
	Emeryville	1,500	3,767	2,267	151%	↑
	Fremont	14,310	12,259	(2,051)	-14%	↓
	Hayward	4,150	2,847	(1,303)	-31%	↓
	Livermore	3,980	4,072	92	2%	↑
ALAMEDA	Newark	1,790	2,460	670	37%	↑
	Oakland	27,280	36,545	9,265	34%	↑
	Piedmont	600	73	(527)	-88%	↓
	Pleasanton	4,790	3,637	(1,153)	-24%	↓
	San Leandro	3,130	1,893	(1,237)	-40%	↓
	Unincorporated Alameda	4,530	1,233	(3,297)	-73%	↓
	Union City	2,220	2,059	(161)	-7%	↓
	County Total:	**85,690**	**82,950**	**-2,740**	**-3%**	
	% Regional Allocation	**19.42%**	**18.80%**			
	Antioch	2,480	1,831	(649)	-26%	↓
	Brentwood	1,480	1,447	(33)	-2%	↓
	Clayton	600	217	(383)	-64%	↓
	Concord	3,890	1,799	(2,091)	-54%	↓
	Danville	2,170	218	(1,952)	-90%	↓
	El Cerrito	1,180	962	(218)	-18%	↓
	Hercules	680	300	(380)	-56%	↓
	Lafayette	1,660	855	(805)	-48%	↓
	Martinez	1,350	239	(1,111)	-82%	↓
	Moraga	1,050	685	(365)	-35%	↓
CONTRA COSTA	Oakley	930	975	45	5%	↑
	Orinda	1,140	389	(751)	-66%	↓
	Pinole	580	360	(220)	-38%	↓
	Pittsburg	1,640	1,295	(345)	-21%	↓
	Pleasant Hill	1,870	948	(922)	-49%	↓
	Richmond	4,180	5,064	884	21%	↑
	San Pablo	800	447	(353)	-44%	↓
	San Ramon	4,720	3,123	(1,597)	-34%	↓
	Unincorporated Contra Costa	5,830	1,929	(3,901)	-67%	↓
	Walnut Creek	5,730	4,337	(1,393)	-24%	↓
	County Total:	**43,960**	**27,418**	**-16,542**	**-38%**	
	% Regional Allocation	**9.96%**	**6.21%**			
	Belvedere	160	86	(74)	-46%	↓
	Corte Madera	710	440	(270)	-38%	↓
	Fairfax	530	203	(327)	-62%	↓
	Larkspur	1,020	540	(480)	-47%	↓
	Mill Valley	830	26	(804)	-97%	↓
	Novato	2,110	1,473	(637)	-30%	↓
	Ross	120	24	(96)	-80%	↓
MARIN	San Anselmo	750	194	(556)	-74%	↓
	San Rafael	2,780	2,948	168	6%	↑
	Sausalito	740	208	(532)	-72%	↓
	Tiburon	630	300	(330)	-52%	↓
	Unincorporated Marin	3,830	1,779	(2,051)	-54%	↓
	County Total:	**14,210**	**8,221**	**-5,989**	**-42%**	↓
	% Regional Allocation	**3%**	**2%**	**-1.4%**		

County	City	HMC OPTION 8A (PBA 2050 Total Household Baseline)	ALTERNATIVE METHODOLOGY (PBA 2050 Growth Baseline + Revised Factors)	EFFECT OF CHANGE	% Change	
	JURISDICTION					
NAPA	American Canyon	480	445	(35)	-7%	↓
	Calistoga	210	314	104	49%	↑
	Napa	2,090	1,009	(1,081)	-52%	↓
	St. Helena	180	24	(156)	-87%	↓
	Unincorporated Napa	790	84	(706)	-89%	↓
	Yountville	70	24	(46)	-65%	↓
	County Total:	3,820	1,901	-1,919	-50%	↓
		0.87%	0.43%			
SAN FRANCISCO	San Francisco	72,080	66,064	(6,016)	-8%	↓
	County Total:	72,080	66,064			
	% Regional Allocation	16.34%	14.97%			
SAN MATEO	Atherton	290	29	(261)	-90%	↓
	Belmont	1,770	529	(1,241)	-70%	↓
	Brisbane	2,810	7,479	4,669	166%	↑
	Burlingame	3,450	3,749	299	9%	↑
	Colma	180	338	158	88%	↑
	Daly City	4,830	4,200	(630)	-13%	↓
	East Palo Alto	890	479	(411)	-46%	↓
	Foster City	2,030	602	(1,428)	-70%	↓
	Half Moon Bay	330	224	(106)	-32%	↓
	Hillsborough	610	120	(490)	-80%	↓
	Menlo Park	3,070	2,600	(470)	-15%	↓
	Millbrae	2,370	2,706	336	14%	↑
	Pacifica	1,930	192	(1,738)	-90%	↓
	Portola Valley	250	3	(247)	-99%	↓
	Redwood City	5,190	4,918	(272)	-5%	↓
	San Bruno	2,130	1,523	(607)	-28%	↓
	San Carlos	2,390	892	(1,498)	-63%	↓
	San Mateo	6,690	4,263	(2,427)	-36%	↓
	South San Francisco	3,980	5,067	1,087	27%	↑
	Unincorporated San Mateo	2,930	2,674	(256)	-9%	↓
	Woodside	320	27	(293)	-92%	↓
	County Total:	48,440	42,614	-5,826	-12%	↓
	% Regional Allocation	10.98%	9.66%			
SANTA CLARA	Campbell	3,960	4,576	616	16%	↑
	Cupertino	6,220	7,257	1,037	17%	↑
	Gilroy	1,470	1,572	102	7%	↑
	Los Altos	2,270	1,085	(1,185)	-52%	↓
	Los Altos Hills	540	126	(414)	-77%	↓
	Los Gatos	1,930	153	(1,777)	-92%	↓
	Milpitas	6,580	11,280	4,700	71%	↑
	Monte Sereno	190	4	(186)	-98%	↓
	Morgan Hill	1,140	1,035	(105)	-9%	↓
	Mountain View	11,390	14,815	3,425	30%	↑
	Palo Alto	10,050	13,281	3,231	32%	↑
	San Jose	66,520	95,896	29,376	44%	↑
	Santa Clara	12,050	16,240	4,190	35%	↑
	Saratoga	2,100	1,049	(1,051)	-50%	↓
	Sunnyvale	13,010	13,811	801	6%	↑
	Unincorporated Santa Clara	4,130	3,931	(199)	-5%	↓
	County Total:	143,550	186,108	42,558	30%	↑
	% Regional Allocation	32.54%	42.18%			

County	City	HMC OPTION 8A (PBA 2050 Total Household Baseline)	ALTERNATIVE METHODOLOGY (PBA 2050 Growth Baseline + Revised Factors)	EFFECT OF CHANGE	% Change	
		JURISDICTION				
SOLANO	Benicia	860	178	(682)	-79%	↓
	Dixon	380	129	(251)	-66%	↓
	Fairfield	3,620	4,812	1,192	33%	↑
	Rio Vista	230	50	(180)	-78%	↓
	Suisun City	610	194	(416)	-68%	↓
	Unincorporated Solano	1,020	1,711	691	68%	↑
	Vacaville	2,030	642	(1,388)	-68%	↓
	Vallejo	3,170	1,444	(1,726)	-54%	↓
	County Total:	11,920	9,161	-2,759	-23%	↓
	% Regional Allocation	2.70%	2.08%			
SONOMA	Cloverdale	300	315	15	5%	↑
	Cotati	270	256	(14)	-5%	↓
	Healdsburg	350	289	(61)	-17%	↓
	Petaluma	2,100	1,974	(126)	-6%	↓
	Rohnert Park	1,260	916	(344)	-27%	↓
	Santa Rosa	6,530	7,260	730	11%	↑
	Sebastopol	420	689	269	64%	↑
	Sonoma	330	114	(216)	-66%	↓
	Unincorporated Sonoma	5,250	4,427	(823)	-16%	↓
	Windsor	710	499	(211)	-30%	↓
	County Total:	17,520	16,740	-780	-4%	↓
	% Regional Allocation	3.97%	3.79%			

Immediate Past President	President	Vice President
AL NAGY	DAVID HAUBERT	MARILYN EZZY ASHCRAFT
Mayor of Newark	Mayor of Dublin	Mayor of Alameda

Alameda County Mayors' Conference

Alameda
Marilyn Ezzy Ashcraft

Albany
Nick Pilch

Berkeley
Jesse Arreguin

Dublin
David Haubert

Emeryville
Christian Patz

Fremont
Lily Mei

Hayward
Barbara Halliday

Livermore
John Marchand

Newark
Al Nagy

Oakland
Libby Schaaf

Piedmont
Robert McBain

Pleasanton
Jerry Thorne

San Leandro
Pauline Cutter

Union City
Carol Dutra-Vernaci

Executive Director
Steven Bocian

October 15, 2020

Mr. Jesse Arreguin
President
Association of Bay Area Governments
375 Beale Street
San Francisco, CA 94105

Transmitted via email to Mr. Fred Castro, ABAG Clerk of Board

Dear Mr. Arreguin and ABAG Executive Board Members:

The Alameda County Mayors' Conference is comprised of the mayors from Alameda County cities and holds regular business meetings in part to assemble information helpful in the consideration of problems peculiar to Alameda County. At our meeting of October 14, 2020, our members discussed the proposed methodology for the 2023-31 Regional Housing Needs Allocation Cycle as recommended by the ABAG Housing Methodology and Regional Planning Committees, which will be considered at your October 15, 2020 meeting. As an outcome of our discussion, our members approved a recommendation that the ABAG Executive Committee consider, and approve, the Alternative Methodology as detailed in the attachment to this letter as the proposed RHNA methodology, in lieu of the methodology recommendation detailed in the October 15, 2020 agenda report submitted from the ABAG Executive Director titled *Recommendation for Proposed RHNA Methodology*. This action was approved with the following roll call vote:

Ayes: Mayors Pilch, Mei, Marchand, Nagy, McBain, Thorne, Russo Cutter, Haubert

Noes: Mayor Patz

Abstain: Mayors Arreguin, Dutra-Vernaci, Ezzy Ashcraft and Councilmember Salinas (City of Hayward)

Absent: Schaaf (left meeting early)

Our members expressed their sincere appreciation for the work completed by all committee members and AGAB staff to date on this important regional planning effort and appreciate your consideration of this alternative.

If you have any questions regarding this matter, please contact me directly or Steven Bocian, Alameda County Mayors' Conference, Executive Director.

Sincerely,

David HAubert

David Haubert
President, Alameda County Mayors' Conference

Attachments: Alternative Methodology

c. Alameda County Mayors Conference members

Recommended Alternative Methodology for the 2023-2031 Regional Housing Needs Allocation Cycle

Approved by the Alameda County Mayors' Conference on October 14, 2020

On September 18, 2020, the Housing Methodology Committee voted to adopt a methodology Option 8A" that utilizes the "Plan Bay Area 2050 Future Households" Baseline; and applies a series of Factors that adjust the Baseline allocation, with a strong equity focus ("Access to High Opportunity Areas"), and secondarily, jobs proximity, with the greatest weight given to jobs accessible by auto.

There are concerns with the HMC's recommendation, particularly that it would have several negative outcomes in terms of its resultant distribution of housing growth, inconsistent with Plan Bay Area and key regional planning goals.

For Option 8A, these include housing allocations to Santa Clara County that fall far short of those projected in Plan Bay Area, and that fail to match the explosive jobs growth in the County over the past decade. And, significantly, we conclude the RHNA distribution resulting from Option 8A will work against key regional planning goals, including those to address GHG emissions by placing housing near jobs and transit centers, instead driving growth outwards, perpetuating sprawl and inefficient growth patterns.

In response, an Alternative Methodology has been developed that 1) Uses the 2050 Household Growth Baseline; and 2) makes additional refinements to the Factors to allow for greater emphasis on transit and jobs access, while still maintaining an equity focus.

<u>Impacts of HMC Recommended Methodology</u>

The Baseline Methodology would significantly <u>underallocate</u> new housing to Santa Clara County, resulting in significantly higher allocations to other counties. This means that the methodology fails to adequately address the significant jobs-housing imbalance in Santa Clara County caused by its recent extraordinary jobs growth. In contrast to Plan Bay Area, which anticipates a 42% increase in housing growth in Santa Clara, the methodology assigns only 32% of the RHND there. This amounts to over 40,000 units allocated elsewhere in the region – most problematically, to our outer suburbs, small cities, and rural and unincorporated county areas.

Although the HMC's Option 8A provides an emphasis on equity and fair housing that vitally important, we believe the unintended consequences of the growth patterns dictated by Option 8A may actually work <u>against</u> equity goals by:

- o   Inadequately addressing jobs-housing imbalances in the region and providing places for people to live near where they work.
- o   Driving growth from cities that want and need new housing to serve their communities and support their local economies.
- o   Underemphasizing transit access, thus increasing auto reliance for daily commutes and activities – at a significant economic, social and environmental cost to those residents.

Recommended Alternative Baseline and Factors

The recommended Alternative to Option 8A, shifts to use the "Plan Bay Area 2050 Growth" Baseline and includes further refinements to the Factors as follows:

	HMC Option 8A	Proposed Alternative Methodology
Baseline	Plan Bay Area 2050 Households	Plan Bay Area 2050 Growth
Factors and Weighting		
Very-Low and Low Income Units	• 70 % Access to High Opportunity Areas • 15 % Jobs Proximity – Auto • 15 % Jobs Proximity - Transit	• 60 % Access to High Opportunity Areas • 20 % Jobs Proximity – Auto • 20 % Jobs Proximity - Transit
Moderate and Above Moderate Income Units	• 40 % Access to High Opportunity Areas • 60 % Jobs Proximity Auto	• 20 % Access to High Opportunity Areas • 40 % Jobs Proximity - Auto • 40 % Jobs Proximity - Transit

Together, these changes would have the following beneficial outcomes for the region, each of which would improve its consistency with Plan Bay Area:

- **Increased share of RHNA to the "Big Three" cities and inner Bay Area**, and a corresponding decrease in that assigned to the outer Bay Area, unincorporated, and small and rural communities. This will ensure that that the largest share of housing growth is allocated to the region's biggest job centers, in areas well-served by transit and infrastructure.

- **Reduced allocation to unincorporated county** – avoiding further residential growth pressures in areas most subject to natural hazards, lack of infrastructure capacity, and threatened loss of agricultural and open space land.

- **Alignment of the share of housing growth in Santa Clara County to match Plan Bay Area 2050 and the County's significant jobs growth of the past decade.** Santa Clara, home of some of the region's largest tech firms, has the largest numeric deficit in housing production to jobs production over the past decade, which could be corrected in part by this adjustment.

- **Reduced overall RHNA allocation for the region's most rural/least transit-accessible counties** (particularly Marin, Sonoma, Napa, and Solano).

- **Continued ability to meet the RHNA Statutory Objectives** – including those related to equity, fair housing and environmental goals.

- **Enhanced consistency with Plan Bay Area 2050,** a requirement of the ultimate RHNA allocation.

Attachments
Summary of Jurisdiction-Specific Allocations

ALTERNATIVE METHODOLOGY:SUMMARY OF JURISDICTION-SPECIFIC ALLOCATIONS

County	City	HMC OPTION 8A (PBA 2050 Total Household Baseline)	ALTERNATIVE METHODOLOGY (PBA 2050 Growth Baseline + Revised Factors)	EFFECT OF CHANGE	% Change	
	Alameda	4,900	3,378	(1,522)	-31%	↓
	Albany	1,150	426	(724)	-63%	↓
	Berkeley	7,730	4,894	(2,836)	-37%	↓
	Dublin	3,630	3,952	322	9%	↑
	Emeryville	1,500	3,661	2,161	144%	↑
	Fremont	14,310	12,311	(1,999)	-14%	↓
	Hayward	4,150	2,600	(1,550)	-37%	↓
	Livermore	3,980	4,072	92	2%	↑
	Newark	1,790	2,354	564	32%	↑
ALAMEDA	Oakland	27,280	35,160	7,880	29%	↑
	Piedmont	600	76	(524)	-87%	↓
	Pleasanton	4,790	3,897	(893)	-19%	↓
	San Leandro	3,130	1,793	(1,337)	-43%	↓
	Unincorporated Alameda	4,530	1,192	(3,338)	-74%	↓
	Union City	2,220	1,866	(354)	-16%	↓
	County Total:	**85,690**	**81,631**	**-4,059**	**-5%**	
		19.42%	18.50%			
	% Regional Allocation					
	Antioch	2,480	1,652	(828)	-33%	↓
	Brentwood	1,480	1,405	(75)	-5%	↓
	Clayton	600	230	(370)	-62%	↓
	Concord	3,890	1,796	(2,094)	-54%	↓
	Danville	2,170	231	(1,939)	-89%	↓
	El Cerrito	1,180	951	(229)	-19%	↓
	Hercules	680	267	(413)	-61%	↓
	Lafayette	1,660	905	(755)	-45%	↓
	Martinez	1,350	237	(1,113)	-82%	↓
	Moraga	1,050	730	(320)	-30%	↓
CONTRA COSTA	Oakley	930	916	(14)	-1%	↓
	Orinda	1,140	411	(729)	-64%	↓
	Pinole	580	345	(235)	-40%	↓
	Pittsburg	1,640	1,155	(485)	-30%	↓
	Pleasant Hill	1,870	1,005	(865)	-46%	↓
	Richmond	4,180	4,517	337	8%	↑
	San Pablo	800	381	(419)	-52%	↓
	San Ramon	4,720	3,270	(1,450)	-31%	↓
	Unincorporated Contra Costa	5,830	1,943	(3,887)	-67%	↓
	Walnut Creek	5,730	4,629	(1,101)	-19%	↓
	County Total:	**43,960**	**26,978**	**-16,982**	**-39%**	
	% Regional Allocation	9.96%	6.11%			
	Belvedere	160	87	(73)	-45%	↓
	Corte Madera	710	461	(249)	-35%	↓
	Fairfax	530	212	(318)	-60%	↓
	Larkspur	1,020	565	(455)	-45%	↓
	Mill Valley	830	27	(803)	-97%	↓
	Novato	2,110	1,513	(597)	-28%	↓
	Ross	120	24	(96)	-80%	↓
MARIN	San Anselmo	750	200	(550)	-73%	↓
	San Rafael	2,780	2,899	119	4%	↑
	Sausalito	740	213	(527)	-71%	↓
	Tiburon	630	311	(319)	-51%	↓
	Unincorporated Marin	3,830	1,873	(1,957)	-51%	↓
	County Total:	**14,210**	**8,387**	**-5,823**	**-41%**	↓
	% Regional Allocation	3.22%	1.90%			

ALTERNATIVE METHODOLOGY:SUMMARY OF JURISDICTION-SPECIFIC ALLOCATIONS

County	City	HMC OPTION 8A (PBA 2050 Total Household Baseline)	ALTERNATIVE METHODOLOGY (PBA 2050 Growth Baseline + Revised Factors)	EFFECT OF CHANGE	% Change	
	JURISDICTION					
	American Canyon	480	415	(65)	-14%	↓
	Calistoga	210	287	77	37%	↑
	Napa	2,090	934	(1,156)	-55%	↓
	St. Helena	180	21	(159)	-88%	↓
NAPA	Unincorporated Napa	790	84	(706)	-89%	↓
	Yountville	70	22	(48)	-68%	↓
	County Total:	**3,820**	**1,764**	**-2,056**	-54%	↓
		0.87%	0.40%			
	San Francisco	72,080	67,375	(4,705)	-7%	↓
SAN FRANCISCO	**County Total:**	**72,080**	**67,375**			
	% Regional Allocation	16.34%	15.27%			
	Atherton	290	29	(261)	-90%	↓
	Belmont	1,770	565	(1,205)	-68%	↓
	Brisbane	2,810	7,341	4,531	161%	↑
	Burlingame	3,450	4,014	564	16%	↑
	Colma	180	323	143	80%	↑
	Daly City	4,830	3,950	(880)	-18%	↓
	East Palo Alto	890	420	(470)	-53%	↓
	Foster City	2,030	627	(1,403)	-69%	↓
	Half Moon Bay	330	212	(118)	-36%	↓
	Hillsborough	610	126	(484)	-79%	↓
	Menlo Park	3,070	2,817	(253)	-8%	↓
SAN MATEO	Millbrae	2,370	2,810	440	19%	↑
	Pacifica	1,930	209	(1,721)	-89%	↓
	Portola Valley	250	3	(247)	-99%	↓
	Redwood City	5,190	5,022	(168)	-3%	↓
	San Bruno	2,130	1,522	(608)	-29%	↓
	San Carlos	2,390	945	(1,445)	-60%	↓
	San Mateo	6,690	4,449	(2,241)	-33%	↓
	South San Francisco	3,980	4,832	852	21%	↑
	Unincorporated San Mateo	2,930	2,740	(190)	-6%	↓
	Woodside	320	28	(292)	-91%	↓
	County Total:	**48,440**	**42,986**	**-5,454**	-11%	↓
	% Regional Allocation	10.98%	9.74%			
	Campbell	3,960	4,820	860	22%	↑
	Cupertino	6,220	7,125	905	15%	↑
	Gilroy	1,470	1,471	1	0%	↑
	Los Altos	2,270	1,136	(1,134)	-50%	↓
	Los Altos Hills	540	132	(408)	-76%	↓
	Los Gatos	1,930	162	(1,768)	-92%	↓
	Milpitas	6,580	10,785	4,205	64%	↑
	Monte Sereno	190	4	(186)	-98%	↓
	Morgan Hill	1,140	998	(142)	-12%	↓
SANTA CLARA	Mountain View	11,390	15,642	4,252	37%	↑
	Palo Alto	10,050	14,003	3,953	39%	↑
	San Jose	66,520	95,424	28,904	43%	↑
	Santa Clara	12,050	16,641	4,591	38%	↑
	Saratoga	2,100	1,074	(1,026)	-49%	↓
	Sunnyvale	13,010	14,059	1,049	8%	↑
	Unincorporated Santa Clara	4,130	3,927	(203)	-5%	↓
	County Total:	**143,550**	**187,404**	**43,854**	31%	↑
	% Regional Allocation	32.54%	42.48%			

ALTERNATIVE METHODOLOGY:SUMMARY OF JURISDICTION-SPECIFIC ALLOCATIONS

County	City	HMC OPTION 8A (PBA 2050 Total Household Baseline)	ALTERNATIVE METHODOLOGY (PBA 2050 Growth Baseline + Revised Factors)	EFFECT OF CHANGE	% Change	
	Benicia	860	173	(687)	-80%	↓
	Dixon	380	120	(260)	-68%	↓
	Fairfield	3,620	4,526	906	25%	↑
	Rio Vista	230	47	(183)	-80%	↓
SOLANO	Suisun City	610	178	(432)	-71%	↓
	Unincorporated Solano	1,020	1,629	609	60%	↑
	Vacaville	2,030	616	(1,414)	-70%	↓
	Vallejo	3,170	1,315	(1,855)	-59%	↓
	County Total:	11,920	8,605	-3,315	-28%	↓
	% Regional Allocation	2.70%	1.95%			
	Cloverdale	300	297	(3)	-1%	↓
	Cotati	270	240	(30)	-11%	↓
	Healdsburg	350	265	(85)	-24%	↓
	Petaluma	2,100	1,942	(158)	-8%	↓
	Rohnert Park	1,260	875	(385)	-31%	↓
SONOMA	Santa Rosa	6,530	7,097	567	9%	↑
	Sebastopol	420	638	218	52%	↑
	Sonoma	330	104	(226)	-68%	↓
	Unincorporated Sonoma	5,250	4,125	(1,125)	-21%	↓
	Windsor	710	465	(245)	-34%	↓
	County Total:	17,520	16,048	-1,472	-8%	↓
	% Regional Allocation	3.97%	3.64%			

Tri-Valley Cities

DANVILLE • LIVERMORE • PLEASANTON • SAN RAMON

November 17, 2020

Mayor Jesse Arreguin, President
Executive Board, Association of Bay Area Governments
375 Beale Street, Suite 700
San Francisco, CA 94105

Dear Mayor Arreguin:

On behalf of the Tri-Valley Cities of Danville, Livermore, Pleasanton and San Ramon, we once again want to express our appreciation for ABAG's work on the 6th Cycle RHNA process, and to develop a methodology that appropriately and fairly distributes the 441,176 unit RHND recently allocated to the Bay Area by the State Department of Housing and Community Development (HCD).

On October 15, 2020, the ABAG Executive Board voted to support the Housing Methodology Committee's recommended methodology "Option 8A" and to forward it for public review in advance of submittal to the State Department of Housing and Community Development. The methodology utilizes the "Plan Bay Area 2050 Future Households" Baseline; and applies a series of Factors that adjust the Baseline allocation, with a strong equity focus ("Access to High Opportunity Areas"), and secondarily, jobs proximity, with the greatest weight given to jobs accessible by auto.

Prior to the October public hearing, on October 8, 2020 the Tri-Valley Cities submitted a letter expressing significant concerns with the proposed methodology, particularly that it would have several negative outcomes in terms of its resultant distribution of housing growth, inconsistent with Plan Bay Area and key regional planning goals. We are writing to reiterate those prior concerns, which were echoed in a similar letter from the Alameda County Mayor's Association and were also expressed by a number of ABAG Executive Board members and speakers at the October 15 hearing.

For Option 8A, these include housing allocations to Santa Clara County that fall far short of those projected in Plan Bay Area, and that fail to match the explosive jobs growth in the County over the past decade. And, significantly, we conclude the RHNA distribution resulting from Option 8A will work against key regional planning goals, including those to address GHG emissions by placing housing near jobs and transit centers, instead driving growth outwards, perpetuating sprawl and inefficient growth patterns.

As result, we would urge the Executive Board to consider an Alternative Methodology that 1) Uses the 2050 Household Growth Baseline; and 2) makes additional refinements to the Factors to allow for greater emphasis on transit and jobs access, while still maintaining an equity focus.

Impacts of HMC Recommended Methodology

As noted in our prior correspondence, the proposed Baseline would significantly under allocate new housing to Santa Clara County, resulting in significantly higher allocations to other counties. This means that the methodology fails to adequately address the significant jobs-housing imbalance in Santa Clara County caused by its recent extraordinary jobs growth. In contrast to Plan Bay Area, which anticipates a 42% increase in housing growth in Santa Clara, the methodology assigns only 32% of the RHND there. This amounts to over 40,000 units allocated elsewhere in the region – most problematically, to our outer suburbs, small cities, and rural and unincorporated county areas.

The Contra Costa letter highlights some of the inequitable and unrealistic distributions to smaller cities across the region. In Danville, here in the Tri-Valley, the difference would amount to over 1,800 units, a more than 700% difference from the 2050 Growth Baseline. Similarly, large disparities are seen in other small cities.

Although the HMC's Option 8A provides an emphasis on equity and fair housing that is vitally important, we believe the unintended consequences of the growth patterns dictated by Option 8A may actually work against equity goals by:

- Inadequately addressing jobs-housing imbalances in the region requiring people to travel long distances from where they live to where they work.

- Driving growth from cities that want and need new housing to serve their communities and support their local economies.

- Underemphasizing transit access, thus increasing auto reliance for daily commutes and activities – at a significant economic, social and environmental cost to those residents.

Recommended Alternative Baseline and Factors

As previously requested, and similar to the approach advocated by Contra Costa County and others at the Executive Board's October public hearing, we would urge the Executive Board to consider an Alternative to Option 8A, that shifts to use the "Plan Bay Area 2050 Growth" Baseline. We would also seek further refinements to the Factors as follows:

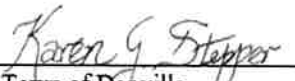|	HMC Option 8A	Proposed Alternative Methodology
Baseline	Plan Bay Area 2050 Households	Plan Bay Area 2050 Growth
Factors and Weighting		
Very-Low and Low Income Units	• 70 % Access to High Opportunity Areas • 15 % Jobs Proximity – Auto • 15 % Jobs Proximity - Transit	• 60 % Access to High Opportunity Areas • 20 % Jobs Proximity – Auto • 20 % Jobs Proximity - Transit
Moderate and Above Moderate Income Units	• 40 % Access to High Opportunity Areas • 60 % Jobs Proximity Auto	• 20 % Access to High Opportunity Areas • 40 % Jobs Proximity - Auto • 40 % Jobs Proximity - Transit

Together, these changes would have the following beneficial outcomes for the region, each of which would improve its consistency with Plan Bay Area:

- **Increased share of RHNA to the "Big Three" cities and inner Bay Area**, and a corresponding decrease in that assigned to the outer Bay Area, unincorporated, and small and rural communities by approximately 30,000 units. This will ensure that that the largest share of housing growth is allocated to the region's biggest job centers, in areas well-served by transit and infrastructure.

- **Reduced allocation to unincorporated county areas by over 10,500 units** – avoiding further residential growth pressures in areas most subject to natural hazards, lack of infrastructure capacity, and threatened loss of agricultural and open space land.

- **Alignment of the share of housing growth in Santa Clara County to match Plan Bay Area 2050 and the County's significant jobs growth of the past decade.** Santa Clara, home of some of the region's largest tech firms, has the largest numeric deficit in housing production to jobs production over the past decade, which could be corrected in part by this adjustment.

We appreciate the opportunity to bring forward this Alternative Methodology, and request that the Executive Board be provided an opportunity to duly consider this alternative in their forthcoming deliberations on the RHNA Methodology.

Respectfully,

Town of Danville
Mayor Karen Stepper

City of Livermore
Mayor John Marchand

City of Pleasanton
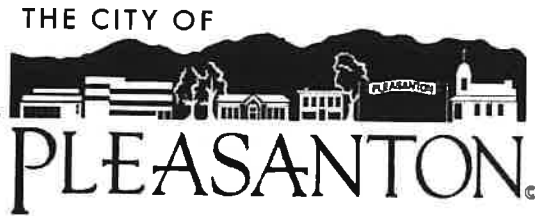Mayor Jerry Thorne

City of San Ramon
Mayor Bill Clarkson

Attachments:
1. Summary of Representative Jurisdiction-Specific Allocations, Modified Methodology

ATTACHMENT 1: REPRESENTATIVE JURISDICTION-SPECIFIC ALLOCATIONS

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	Redwood City	5,190	5,022	(168)	-3%	↓
	San Bruno	2,130	1,522	(608)	-29%	↓
	San Carlos	2,390	945	(1,445)	-60%	↓
	San Mateo	6,690	4,449	(2,241)	-33%	↓
	South San Francisco	3,980	4,832	852	21%	↑
	Unincorporated San Mateo	2,930	2,740	(190)	-6%	↓
	Woodside	320	28	(292)	-91%	↓
	County Total:	48,440	42,986	-5,454	-11%	↓
	% Regional Allocation	10.98%	9.74%			
SANTA CLARA	Campbell	3,960	4,820	860	22%	↑
	Cupertino	6,220	7,125	905	15%	↑
	Gilroy	1,470	1,471	1	0%	↑
	Los Altos	2,270	1,136	(1,134)	-50%	↓
	Los Altos Hills	540	132	(408)	-76%	↓
	Los Gatos	1,930	162	(1,768)	-92%	↓
	Milpitas	6,580	10,785	4,205	64%	↑
	Monte Sereno	190	4	(186)	-98%	↓
	Morgan Hill	1,140	998	(142)	-12%	↓
	Mountain View	11,390	15,642	4,252	37%	↑
	Palo Alto	10,050	14,003	3,953	39%	↑
	San Jose	66,520	95,424	28,904	43%	↑
	Santa Clara	12,050	16,641	4,591	38%	↑
	Saratoga	2,100	1,074	(1,026)	-49%	↓
	Sunnyvale	13,010	14,059	1,049	8%	↑
	Unincorporated Santa Clara	4,130	3,927	(203)	-5%	↓
	County Total:	143,550	187,404	43,854	31%	↑
	% Regional Allocation	32.54%	42.48%			

THE CITY OF

PLEASANTON.

January 13, 2021

Mayor Jesse Arreguin, President
Executive Board, Association of Bay Area Governments
375 Beale Street, Suite 700
San Francisco, CA 94105

Dear Chair Arreguin:

On behalf of the City of Pleasanton, I am once again writing to express our significant concerns about the Draft Regional Housing Needs Allocation (RHNA) Methodology. The ABAG Executive Board is due to make a final recommendation on the methodology to the State Department of Housing and Community Development on January 21, 2021. This letter re-states our prior concerns, and, importantly, expresses our dismay at the most recent revisions to the Plan Bay Area 2050 Blueprint that have resulted in a dramatic, 25 percent increase in our potential RHNA allocation. As outlined in more detail in this letter, the changes not only fail to address our prior concerns but exacerbate them. And, being brought forward in the closing weeks of the process means that there was no opportunity for these significant changes to the baseline allocations to be considered or vetted as part of the RHNA methodology process – a significant deficiency.

On November 17, 2020, the Mayor of Pleasanton and fellow Tri-Valley mayors of Danville, Livermore, and San Ramon, wrote to reiterate comments previously raised in communication to you from the Tri-Valley Cities, and from the Alameda County Mayor's Conference, pointing out several significant flaws in the proposed RHNA methodology (Attachment 1). Not least of these was a marked underemphasis on housing allocations to South Bay communities that have favored massive jobs growth over recent years, without a balanced production of new housing; and a corresponding overallocation of housing to unincorporated communities, and to rural and suburban jurisdictions on the outer fringes of the Bay Area. We appropriately observed that the resultant growth pattern will only serve to exacerbate congestion and increase commutes, with substantial negative consequences in terms of meeting regional Greenhouse Gas (GHG) emissions goals. To correct these deficiencies, we recommended the use of an alternative baseline (2050 Household Growth) and adjusted factors, that would more appropriately allocate new housing where it is needed most, in the most transit-rich and jobs-rich counties, including Santa Clara and San Mateo counties.

P. O. Box 520, Pleasanton, CA 94566-0802   **123 Main Street**

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Since then, on December 18, 2020, ABAG/MTC released the Final Plan Bay Area 2050 Blueprint and growth projections, based on revised Blueprint Strategies. Because the RHNA methodology relies upon the Blueprint's housing projections in its Baseline allocation, on December 18, ABAG/MTC also published a revised series of "illustrative" RHNA allocations, including an allocation of just under 6,000 units to the City of Pleasanton (up from approximately 4,800 units in the prior draft). Although the Blueprint revisions make some appropriate adjustments, such as increasing housing growth projections in San Francisco, and reducing those in rural counties, they also reflect some much more alarming changes. Of particular concern, Santa Clara County and several of its cities, including Palo Alto, Cupertino, and Campbell, show significantly decreased housing projections and corresponding RHNA allocations; at the same time, the revised Blueprint projections and RHNA show much larger housing allocations to certain East Bay cities, including Pleasanton.

Key reasons for these shifts include softening of strategies intended to discourage overproduction of jobs in certain areas; and, in an effort to address GHG targets, more emphasis placed on increased housing densities on sites around transit, and through the redevelopment of commercial properties.

A consequence of these changes is to project even more future jobs growth in South Bay cities and to reduce these same cities' projected housing numbers. At the same time, the identical strategies that expand job growth and decrease housing production in Santa Clara County are shown as having the opposite effect in the Tri-Valley, with half the number of jobs compared to the July 2020 Blueprint forecast (now a minimal 13 percent increase in jobs over the next 35 years), while substantially increasing housing growth from 58 percent to 82 percent over 35 years, such that eastern Alameda County would now have the third highest housing growth rate in the entire region. As well as unrealistic jobs and housing projections, the revised growth forecasts continue precisely the trends that have benefited South Bay cities – allowing for more and more lucrative, employment-generating growth, while pushing the impacts of that growth to other parts of the Bay Area, particularly the East Bay's suburban communities.

The consequence of those decisions is clear. As illustrated by ABAG's mapping of the limited "transit-rich growth geography" in Pleasanton, our city and many similar suburban communities have extremely poor transit service outside of the immediate BART walking radius, meaning that most daily trips for school, shopping and recreation rely on private automobiles. It is unrealistic to assume that all of the RHNA can or will be located in these limited geographies and that these thousands of new commute and other daily trips associated with new housing will be served by BART and other transit. This means ever-more vehicles on our congested regional highways, more congestion, more vehicle trips, and more GHG emissions, in contradiction of ABAG/MTC's stated environmental goals.

Finally, as noted, the fact that these significant changes have been made, in the final weeks of the process, means that there has been no proper vetting of the effect of the revised projections, as they may have influenced the Housing Methodology Committee and others' decision-making on the RHNA methodology. While we understand the challenge faced by ABAG in managing the

timeline for both processes simultaneously, doing so has deprived those involved the opportunity to make decisions with a solid understanding of one of the foundational elements of the methodology, the baseline housing allocations derived from Plan Bay Area.

In conclusion, these shifts result in a disproportionate and unrealistic eight-year RHNA allocation for Pleasanton, especially given recent changes to state law that make accommodating such substantial numbers of new housing units ever more challenging. In light of these concerns, we continue to ask the ABAG Executive Board to reconsider our prior requests to modify the Baseline and factors used to develop the RHNA methodology to result in allocations that can better meet regional environmental goals; and at a minimum, would urge the Board to reject the latest round of revisions to the Blueprint and resultant RHNA adjustments.

Sincerely,

Karla Brown, Mayor
City of Pleasanton

cc.   Pleasanton City Council
        Nelson Fialho, City Manager
        Brian Dolan, Assistant City Manager
        Ellen Clark, Director of Community Development

Attachment:
        November 17, 2020 Letter from Tri-Valley Mayors

Vehicle Miles Traveled per Capita
East Planning Area

ATTACHMENT D

East Planning Area Average (Target -15%): 30.5 (25.9)
Alameda County Average (Target -15%): 19.4 (16.5)

Data Source: Alameda Countywide Travel Model, Plan Bay Area 2040 version, May 2019

Vehicle miles traveled (VMT) = home-based trips (home-based work, school, shopping/errands, social/recreation) at transportation analysis zone (TAZ) containing residence site

VMT also includes estimates of non-home trips generated by residents at the non-residential end of the home-based trip (e.g. lunch trips from workplace)

VMT per capita = home-based VMT at residence TAZ divided by total population in TAZ

VMT includes all travel within 9-county Bay Area plus San Joaquin County plus estimates of travel distances beyond the 10-county model area

TAZs with zero values (white) did not have population in the 2020 model

2020 Vehicle Miles Traveled per Capita by TAZ

- > 25.00
- 20.01 - 25.00
- 15.01 - 20.00
- 10.01 - 15.00
- 0.01 - 10.00
- 0.00

0   1   2   3 Miles

ALAMEDA
County Transportation Commission

Alameda County
North Planning Area
Central Planning Area
South Planning Area
East Planning Area