



Town of Danville

Regional Housing Needs Assessment Appeal



In accordance with Government Code Sec. 65584.05(b), Danville submits an appeal of its RHNA allocation on the following bases:

1. RHNA was allocated based on an **incorrect modeling assumption**
2. RHNA was allocated in a manner that **fails to consider local planning factors** and **undermines other statutory objectives**
3. Significant and unforeseen **change in circumstance** merits a reconsideration

Incorrect Modeling Assumption

Plan Bay Area model incorrectly assumed that Danville has a Priority Development Area (PDA) - one of four identified Growth Geographies

MAP 1.1 Plan Bay Area 2050 Growth Geographies

- Priority Development Area*
- Priority Production Area
- Transit-Rich Area
- Transit-Rich and High-Resource Area
- High-Resource Area with Basic Bus Service**
- Regional Rail Station (Existing)
- Regional Rail Station (Plan Bay Area 2050)
- Regional Transit (Existing)
- Regional Rail (Plan Bay Area 2050)***
- Major Airport
- Major Seaport

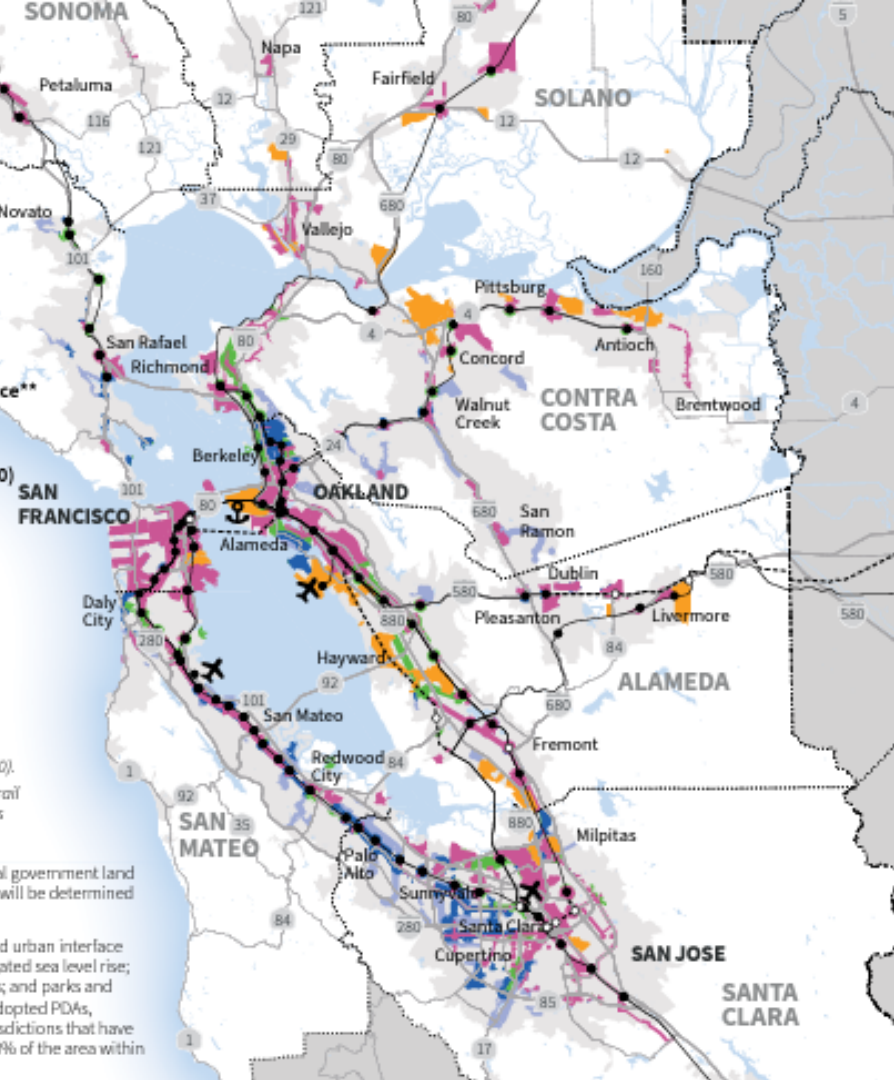
* Priority Development Areas are locally designated geographies that, in general, meet state Transit Priority Area criteria as well as additional MTC/ABAG criteria.

** Peak headways of 16 to 30 minutes (January 2020).

*** Includes intercity rail, commuter rail, and heavy rail systems. New Transbay Rail Crossing alignment is representative only.

Areas shown are conceptual, and do not supersede local government land use authority. Specific levels and types of development will be determined through local planning.

The following areas are excluded from the map: wildland urban interface areas; unmitigated High Hazard Areas; areas of unmitigated sea level rise; areas outside locally-adopted urban growth boundaries; and parks and open spaces within urbanized areas. To complement adopted PDAs, High-Resource and Transit-Rich Areas are shown in jurisdictions that have nominated a total land area for PDAs that is less than 50% of the area within its boundaries eligible for PDA designation.



Incorrect Modeling Assumption

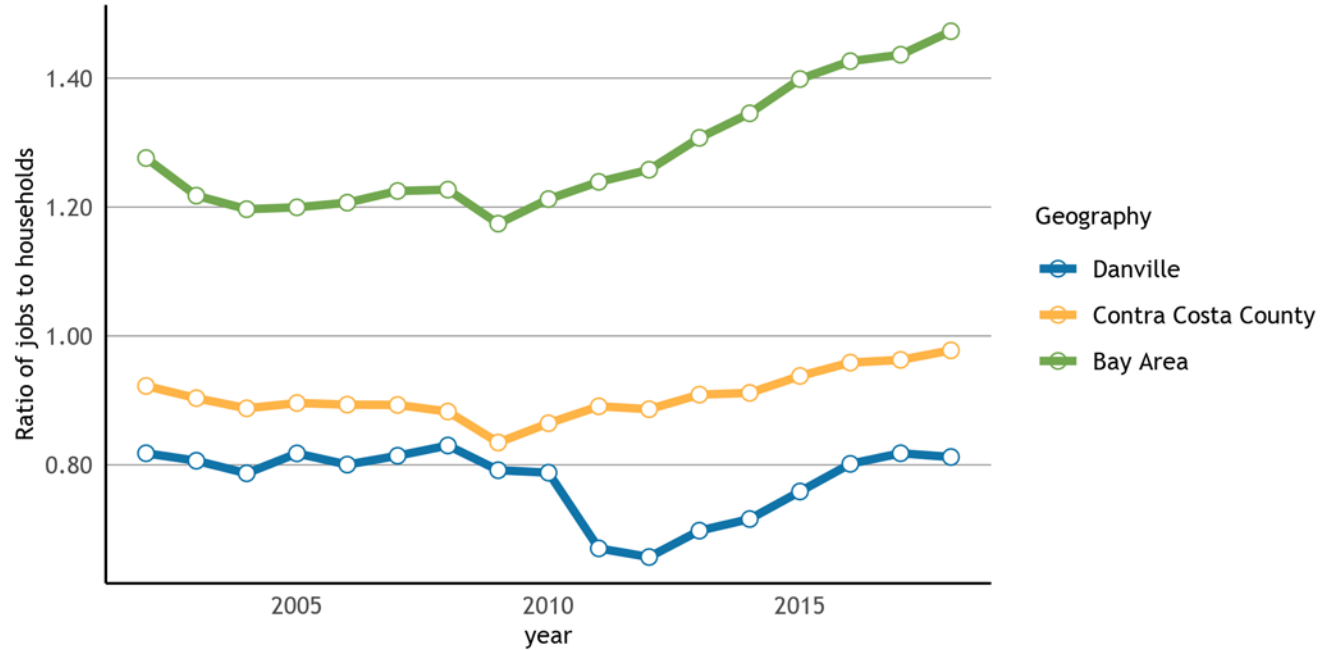
Lack of a PDA reflects a community underserved by public transit:

- Located ~9 miles to nearest BART Stations (north and south)
- One bus route



Failed to Consider Local Planning Factors

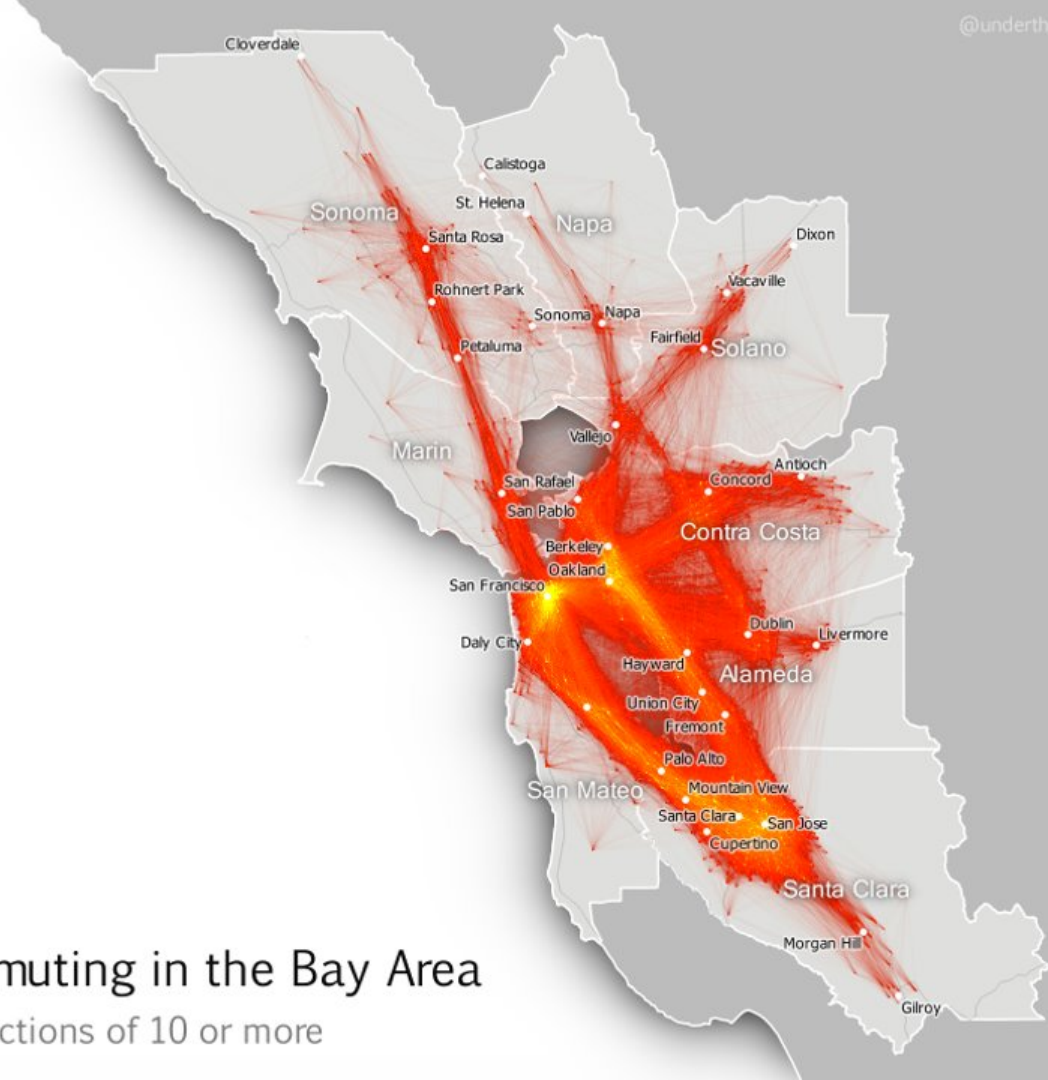
Proposed RHNA assignment exacerbates Danville's existing jobs-to-housing imbalance



Data source: ABAG Housing Needs Data Report for Danville

Failed to Further Five Statutory Objectives

Proposed RHNA
undermines a statutory
objective to encourage
efficient development
patterns and achieve
greenhouse gas emission
reduction targets



Commuting in the Bay Area

Connections of 10 or more

Failed to Further Five Statutory Objectives

Proposed RHNA undermines a statutory objective to encourage efficient development patterns and achieve greenhouse gas emission reduction targets.



Significant,
Unforeseen
Change in
Circumstance





*Thank you for
your time.*