**Fred Castro**

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| | |
|---|---|
| **From:** | Ouse, Andrea <Andrea.Ouse@cityofconcord.org> |
| **Sent:** | Thursday, September 17, 2020 11:09 AM |
| **To:** | Fred Castro |
| **Cc:** | Mecum, Gladys |
| **Subject:** | RE: ABAG Housing Methodology Committee -- Online RHNA Visualization Tool |
| **Attachments:** | Concord Letter to ABAG Exec Board - RHNA Methodology (2020.09.17).pdf |

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Hi Fred,
Thanks – see attached.

Regards,
Andrea

Andrea Ouse, AICP
Director, Community Development Department
City of Concord | Website: www.cityofconcord.org
☎ (925) 671-3434 | ✉ andrea.ouse@cityofconcord.org
1950 Parkside Drive, MS/01B, Concord, CA  94519

Community Development Department
www.cityofconcord.org

Your feedback on Community Development Department services would be appreciated.
Please take a moment to complete our on-line surveys at https://www.surveymonkey.com/s/DRS1

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**From:** Fred Castro <fcastro@bayareametro.gov>
**Sent:** Thursday, September 17, 2020 11:07 AM
**To:** Ouse, Andrea <Andrea.Ouse@cityofconcord.org>
**Subject:** RE: ABAG Housing Methodology Committee -- Online RHNA Visualization Tool

Good morning, Andrea.

Please address the letter to ABAG President Arreguin.  Email the letter as an attachment to me as soon as possible this morning.  I will be updating the meeting handouts early this afternoon.

Thank you.

Fred Castro
Office (415) 820-7913
Cell (415) 690-0529

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**From:** Ouse, Andrea [mailto:Andrea.Ouse@cityofconcord.org]
**Sent:** Thursday, September 17, 2020 11:03 AM

**To:** Fred Castro <fcastro@bayareametro.gov>
**Subject:** RE: ABAG Housing Methodology Committee -- Online RHNA Visualization Tool
**Importance:** High

Hi Fred –
The City of Concord will be submitting a letter for tonight's Exec Board meeting – to whom shall we send it to get it into the record? It is addressed to Board President Arreguin, but I don't have an email address for him.

Thanks,
Andrea

Andrea Ouse, AICP
Director, Community Development Department
City of Concord | Website: www.cityofconcord.org
☎ (925) 671-3434 | ✉ andrea.ouse@cityofconcord.org
1950 Parkside Drive, MS/01B, Concord, CA  94519

Community Development Department
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Please take a moment to complete our on-line surveys at https://www.surveymonkey.com/s/DRS1

**From:** Fred Castro <fcastro@bayareametro.gov>
**Sent:** Thursday, September 17, 2020 10:11 AM
**Subject:** ABAG Housing Methodology Committee -- Online RHNA Visualization Tool

ABAG Housing Methodology Committee Members:

Staff wanted to alert you that the online RHNA visualization tool has been updated. The sliders used to set the factor weights can now be adjusted in 5% increments. This change allows you to explore all four options being presented at tomorrow's meeting. The factors and weights for these options are shown below:

| Option 5A:<br>50/50 High Opportunity Areas & Jobs | Option 7A:<br>Balanced High Opportunity Areas & Job Proximity<br>*(differences from Option 5A underlined)* |
|---|---|
| *Very Low and Low*<br>50%     Access to High Opportunity Areas<br>50%     Jobs-Housing Fit | *Very Low and Low*<br>50%     Access to High Opportunity Areas<br>25%     Job Proximity – Auto<br>25%     Job Proximity – Transit |
| *Moderate and Above Moderate*<br>50%     Access to High Opportunity Areas | *Moderate and Above Moderate*<br>50%     Access to High Opportunity Areas |

| | |
|---|---|
| 50%      Job Proximity – Auto | 50%      Job Proximity – Auto |
| **Option 6A:**<br>**Modified High Opportunity Areas Emphasis** | **Option 8A:**<br>**High Opportunity Areas Emphasis & Job Proximity**<br>*(differences from Option 6A underlined)* |
| *Very Low and Low*<br>70%      Access to High Opportunity Areas<br>30%      Jobs-Housing Fit<br><br><br>*Moderate and Above Moderate*<br>40%      Access to High Opportunity Areas<br>60%      Job Proximity – Auto | *Very Low and Low*<br>70%      Access to High Opportunity Areas<br><u>15%</u>      <u>Job Proximity – Auto</u><br><u>15%</u>      <u>Job Proximity – Transit</u><br><br>*Moderate and Above Moderate*<br>40%      Access to High Opportunity Areas<br>60%      Job Proximity – Auto |

The performance metrics available in the tool have also been updated to reflect the current set of metrics being used by the HMC, including the metric proposed by HMC members on September 4. However, Metric 5c is currently unavailable in the tool due to technical difficulties. For more information on Metric 5c and the other performance metrics, see Appendix 6 from the agenda packet for the September 18 meeting.

Staff encourages the HMC to use the tool in advance of tomorrow's meeting to explore the four methodology options being discussed. As a reminder, you can use the buttons in the "Results Summary" section of the tool at the bottom of the webpage to view the allocations assigned to jurisdictions. Additionally, you can scroll to the bottom of the page and click the purple button labelled "Download Data," which will download a spreadsheet to your computer showing the allocations to every jurisdiction by income category. The spreadsheet also shows how much each factor selected contributes to a jurisdiction's allocation.

If you have any difficulties using the updated RHNA online visualization tool or have any questions about anything mentioned above, please feel free to contact Eli Kaplan at ekaplan@bayareametro.gov. Staff appreciates the HMC's hard work throughout this process and looks forward to the discussion at this tomorrow's meeting.


Fred Castro
Clerk of the Board
Association of Bay Area Governments
fcastro@bayareametro.gov

**BAY AREA METRO** | BayAreaMetro.gov
Association of Bay Area Governments
Metropolitan Transportation Commission

Bay Area Metro Center
375 Beale Street, Suite 800
San Francisco, California 94105
Office (415) 820-7913
Cell (415) 690-0529

Concord

September 17, 2020


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


Dear President Arreguín:

On behalf of the Concord City Council, I want to take this opportunity to express our appreciation to both the Housing Methodology Committee (HMC) and ABAG staff for their year-long effort of developing, preparing and considering allocation methodologies for the 2023-2031 Regional Housing Needs Allocation (RHNA) cycle. We further appreciate the HMC's consideration of our input to date and utilizing the draft "Plan Bay Area 2050" as the baseline data methodology.
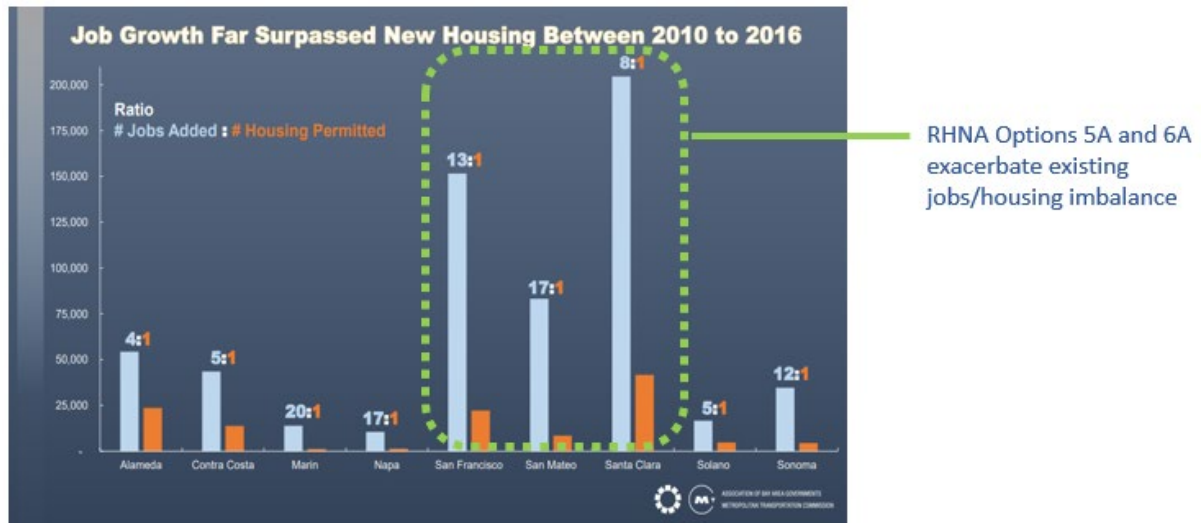
As the work of the HMC concludes, we acknowledge that two methodologies will be considered at the September 18, 2020 meeting for a recommendation to the ABAG Executive Board in October. The two methodologies being refined, crafted from a combination of a variety of weighted "factors", pose a grave concern to the City of Concord and the Bay Area region as we continue to face a housing supply emergency.

The two methodologies proposed for HMC consideration, **Option 5A** ("High Opportunity Areas & Jobs") and **Option 6A** ("Modified High Opportunity Areas Emphasis"), are problematic and are not the methodologies that will result in the greatest opportunity to increase housing supply or address critical issues facing the region. The following are a summary of concerns that inform our opposition:

1. **Weighting the allocation on "high opportunity areas".** Both methodologies include factors that will drive the allocation of units to "high opportunity areas", rather than to urbanized areas where the vast majority of jobs have been created. As defined, "high opportunity areas" could include areas with significant infrastructure constraints, greenfield development, poor proximity to transit, and areas that have been previously developed with lower-density residential uses. The constraints that exist in many of these areas will not result in the actual production of residential units, thereby potentially intensifying the ongoing deficit of supply.

2. **Failure to comply with RHNA statutory objective to "Improve intraregional jobs-housing relationship.** As noted in Figure 1 (see below), areas with the largest job growth from 2010-2016 have not produced their fair share of housing units in the region and the disparity between jobs and housing in some of the region's communities is drastic and overtly inequitable. The City of Concord, being the

city with the largest share of job generation in Contra Costa County, has also acknowledged a need for and have planned to accommodate production of its fair share of housing units.

Figure 1. Existing Jobs/Housing Imbalance (source: ABAG)



The weighted allocation methodology that increases development pressures on suburban, exurban and rural areas is simply not consistent with the statutory objective of the RHNA process to *"improve the intraregional jobs-housing relationship"*.

3. **Lack of Compliance with AB 32 and SB 375 by furthering sprawl.** Weighting the allocation methodology so heavily on "high opportunity areas" will simply exacerbate and encourage development in areas that do not have the carrying capacity to increase density, or will further inequities by causing lower-income households to increase commute times traveling from outlying exurban areas to job centers, which is contrary to the mandates of AB 32 and SB 375, whereby the State of California is required to reduce its greenhouse gas (GHG) emissions. In certain areas where significant environmental and infrastructure constraints such as a lack of viable water supply and sewer service exist, housing units will simply not be constructed due to the costs associated with impact mitigation.

   Further, this level of focus on "high opportunity areas" is in conflict with the statutory objectives of RHNA, including *"Promoting infill development and socioeconomic equity"*.

4. **Negative impact on quality-of-life and transportation systems.** An allocation methodology that results in more units assigned to suburban, exurban and rural areas such as eastern Contra Costa County, unincorporated Solano, Napa and Sonoma Counties and southern Santa Clara County will exacerbate long commute times on overtaxed transportation systems, degrade quality of life and strength of community as workers spend more time away from their homes and families.

In summary, the City of Concord recognizes the critical need to address a statewide housing supply crisis, currently estimated to be a deficit of 3.5 million units. The acute nature of this shortfall requires cities and counties to reduce barriers and streamline processes to remove constraints and focus on high-quality, inclusive residential development of all types. We believe in – and urge the Executive Board to consider - factors that:

a. **Allocate housing growth near job centers.** Figure 1 above shows a clear indication that certain areas of job growth did not produce accordant level of residential development, by a significant margin. Allocating residential units to areas that have enjoyed significant job growth will reduce long commutes, and reduces GHG emissions and impact on already-taxed transportation systems.

b. **Discourage housing growth in suburban, exurban and rural communities** where physical, environmental and infrastructure constraints are more likely to exist, as these areas are least likely to produce the needed housing units during the RHNA reporting period.

c. **Sprawl negatively impacts health, environmental quality, quality-of-life, and strong, connected communities.** In increasing the weight of "high-opportunity areas" for a greater share of housing unit allocation, the practical outcome will result in an increase in development pressure on the outer fringes of the Bay Area region, where land is generally less expensive. Job generation, however, continues to be centered in San Francisco, Oakland, and urbanized areas of San Mateo and Santa Clara Counties. Reliance on this methodology will exacerbate sprawl into outlying areas – resulting in the region not meeting State-mandated GHG reductions – and continue to impact the health and quality-of-life of the workforce required to commute to job centers.

With tremendous appreciation for your work, we thank you for your consideration.

Sincerely,

Tim McGallian
Mayor
City of Concord

CC:     Concord City Council
        Valerie Barone, Concord City Manager
        Joelle Fockler, Concord City Clerk
        Andrea Ouse, Director, Community Development Department

September 15, 2020

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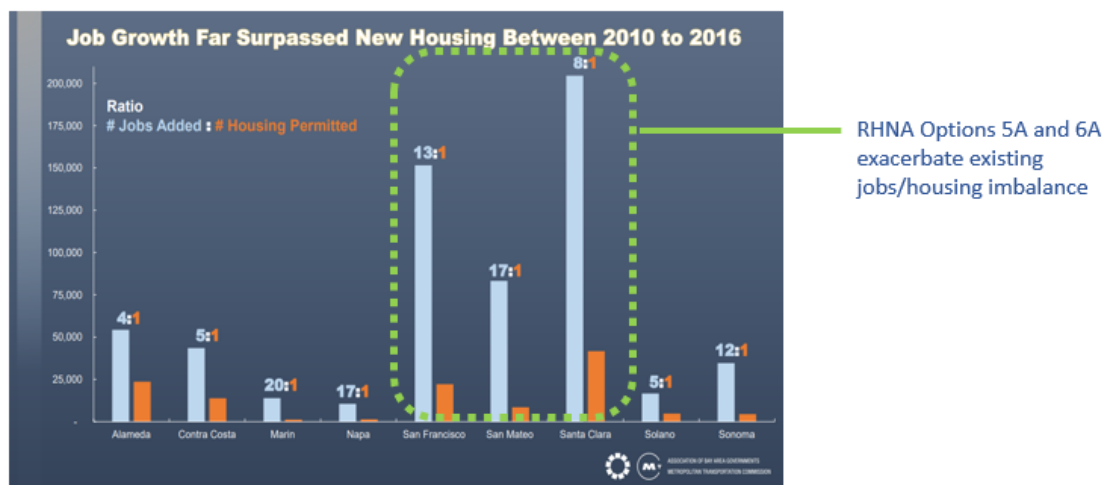375 Beale Street, Suite 700
San Francisco, CA 94105-2066

Dear President Arreguín:

Our council wishes to convey our tremendous appreciation for the Housing Methodology Committee's (HMC) work on the formidable task of evaluating housing allocation methodologies for the next Regional Housing Needs Allocation (RHNA) cycle (2023-2031). We appreciate the HMC's consideration of our input to date and utilizing the "Plan Bay Area 2050" as the baseline data methodology.

We understand that the HMC is now considering options (a combination of different "factors") that would refine the housing allocation methodology. To this end, we are writing to express grave concern that the options proposed for consideration - **Option 5A** ("High Opportunity Areas & Jobs") and **Option 6A** ("Modified High Opportunity Areas Emphasis") - are **rife with unintended consequences.** Specifically:

1. These methodologies allocate housing growth to "high opportunity areas" (suburban communities) rather than to urbanized city centers with a wealth of transit options and high-quality jobs. Doing so would **exacerbate the jobs/housing imbalance**:

   Figure 1. Existing Jobs/Housing Imbalance (source: ABAG)

   in

**510 LA GONDA WAY, DANVILLE, CALIFORNIA 94526**

| Administration | Building | Engineering & Planning | Transportation | Maintenance | Police | Parks and Recreation |
|---|---|---|---|---|---|---|
| (925) 314-3388 | (925) 314-3330 | (925) 314-3310 | (925) 314-3320 | (925) 314-3450 | (925) 314-3700 | (925) 314-3400 |

2. Allocating housing growth to suburban communities **ignores market demand** for housing in urbanized city centers with high-quality jobs.  If the collective goal is to facilitate housing construction, then we strongly advocate for housing to be allocated where there is market demand.

3. Allocating housing growth to small communities with limited land capacity or "high opportunity areas" **ignores land economics**.  Legislating up-zoning to accommodate multi-family housing simply drives up the value of land, which in turn drives up the cost of housing construction.

4. Allocating housing growth in communities that interface with urban growth boundaries would be *contrary* to the prioritizing in-fill development, avoiding areas with natural hazards, and **promotes urban sprawl**.

5. Lastly, allocating growth farther from quality job centers and **exacerbates the staggering commutes on workers**, placing an undue burden on working families.

In summary, Danville recognizes the critical need to address a statewide housing affordability crisis and the responsibility of local cities to help address this issue that is critical to the quality of life for all residents.  We believe in – and urge the Executive Board to consider - factors that:

a. **Allocate housing growth near job centers** (i.e., achieve a greater balance between the "jobs" and "housing" bars in the graphic on page 1).  This reduces long commutes and allows development of a strong social/community fabric.

b. **Discourage housing growth near green fields and protected open space**, reducing development pressure at the urban growth boundaries.

c. **Discourage housing growth in small and rural communities** with limited land capacity, to avoid driving up land development costs and building near natural hazards.
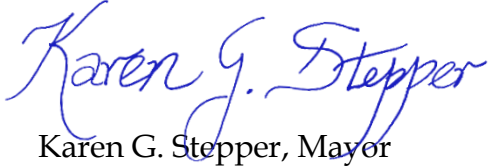
With tremendous appreciation for your work, we thank you for your consideration.

Sincerely,
TOWN OF DANVILLE

Karen G. Stepper, Mayor


Attachment A:   Danville Resolution No. 63-2020, supporting the Contra Costa County Mayors Conference endorsement of the 'Plan Bay Area 2050' Methodology as the basis for the 2022-2030 Regional Housing Needs Allocation (RHNA) under review by the Association of Bay Area Governments

# RESOLUTION NO. 63-2020

## SUPPORTING THE CONTRA COSTA COUNTY MAYORS' CONFERENCE ENDORSEMENT OF THE 'PLAN BAY AREA 2050' HOUSING ALLOCATION METHODOLOGY AS THE BASIS FOR THE 2022-2030 REGIONAL HOUSING NEEDS ALLOCATION (RHNA) UNDER REVIEW BY THE ASSOCIATION OF BAY AREA GOVERNMENTS

**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**, that the Town Council re-affirm the Contra Costa Mayors' Conference letter of support for the support for the 'Plan Bay Area 2050 Baseline Data Methodology' which is consistent with decades-long region-wide efforts to:

- Encourage housing development proximate to job centers, which would in turn
- Reduce transit and transportation congestion, helping to alleviate long regionwide 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.

**APPROVED** by the Danville Town Council at a regular meeting on September 1, 2020 by the following vote:

**AYES:** Arnerich, Blackwell, Morgan, Stepper, Storer
**NOES:** None
**ABSTAINED:** None
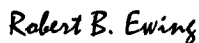**ABSENT:** None

DocuSigned by:

*Ken Blackwell*

4A068AE9F30A4FC...

**MAYOR**

**APPROVED AS TO FORM:**

DocuSigned by:

*Robert B. Ewing*

895C6C40ADBF4BF...

**CITY ATTORNEY**

**ATTEST:**

DocuSigned by:

*M Sumseri*

71735A3F04C942F...

**CITY CLERK**

City Council

Mike Anderson, Mayor
Susan Candell, Vice Mayor
Steven Bliss, Council Member
Cameron Burks, Council Member
Teresa Gerringer, Council Member

**LAFAYETTE**
SETTLED 1848 — INCORPORATED 1968

September 16, 2020

Jesse Arreguin, Chair
Housing Methodology Committee
375 Beale Street, Suite 800
San Francisco, CA 94105-2006
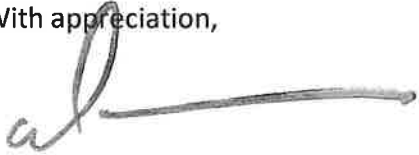
RE: RHNA Housing Methodology

Chair Arreguin:

We'd like to thank you and the work of the ABAG Housing Methodology Committee (HMC) for the tireless efforts on developing a way to distribute the Bay Area region's share of the Regional Housing Need Determination (RHND) received from the California Department of Housing and Community Development (HCD).

We appreciate that this is a challenging task, with highly passionate voices advocating for social equity through this effort. With the specter of COVID-19 and its already-apparent economic impacts, we continue to have reservations about the timeline to complete the work of the HMC. As we previously have written to you, we urge **consideration of a three- to six-month pause** in the development of the final methodology. The full impacts of the recession cannot be known for some time, and therefore to continue advancing a process based on projections that now may no longer be accurate is a critical error.

We do endorse the need for increased housing opportunities for all, but strongly urge the HMC to do so without forsaking the region's enduring commitment toward reducing environmental impacts, long commutes, and greenhouse gas emissions by **placing the homes where the job centers are located**. The City of Lafayette specifically wishes to **express its opposition to Options 5A and 6A**, both of which would push development further away from both existing and anticipated job centers. Although the application of the High Opportunity Area (HOA) factor in the methodology is intended to produce laudable goals pertaining to equity, we feel this is an untested theory. These areas are among the most expensive to build, and as such allocating more units to HOAs may never translate into actual development, especially in terms of affordable units. In addition, many HOAs do not have the kind of job base to support substantial allocations of affordable units, which would, again, result in long commutes, many by car. Toward this end, we were dismayed that lowering Vehicle Miles Traveled (VMTs) was not afforded a greater role in the development of the allocation methodology.

As a community, we are thankful for your continuing facilitation and leadership. We look forward to working with ABAG to help ensure that this effort will not erode the great work the Bay Area has already undertaken to address climate change.

With appreciation,

Mike Anderson, Mayor

Cc:   Therese Watkins McMillan, Executive Director, Association of Bay Area Governments
Gillian Adams, Principal Planner, ABAG Regional Planning Program
Dave Vautin, Plan Bay Area 2050

**RESOLUTION 2020-35**

## BEFORE THE CITY COUNCIL OF THE CITY OF LAFAYETTE
## IN THE MATTER OF:

The City of Lafayette 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; and

NOW, THEREFORE BE IT RESOLVED THAT THE Lafayette City Council does hereby resolve, declare, determine and order the following:

Re-affirm the Contra Costa Mayors' Conference letter of support for the support for the 'Plan Bay Area 2050 Baseline Data Methodology' which is consistent with decades-long region-wide efforts to:

- Encourage housing development proximate to job centers, which would in turn
- Reduce transit and transportation congestion, helping to alleviate long regionwide 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

PASSED, APPROVED AND ADOPTED by the City Council of Lafayette at its regular City Council meeting held on September 14, 2020.

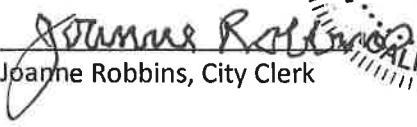AYES: **Anderson, Candell, Burks and Gerringer**
NOES: **None**
ABSTAIN: **None**
ABSENT: **Bliss**

APPROVED:

Mike Anderson Mayor

ATTEST:

Joanne Robbins, City Clerk

September 16, 2020

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

Dear President Arreguín:

Our council wishes to convey our tremendous appreciation for the Housing Methodology Committee's (HMC) work on the formidable task of evaluating housing allocation methodologies for the next Regional Housing Needs Allocation (RHNA) cycle (2023-2031).  We appreciate the HMC's consideration of our input to date and utilizing the "Plan Bay Area 2050" as the baseline data methodology.

We understand that the HMC is now considering options (a combination of different "factors") that would refine the housing allocation methodology.  To this end, we are writing to express grave concern that the options proposed for consideration - **Option 5A** ("High Opportunity Areas & Jobs") and **Option 6A** ("Modified High Opportunity Areas Emphasis") - are **rife with unintended consequences.**  Specifically:

1. These methodologies allocate housing growth to "high opportunity areas" (suburban communities) rather than to urbanized city centers with a wealth of transit options and high-quality jobs.  Doing so would **exacerbate the jobs/housing imbalance**:
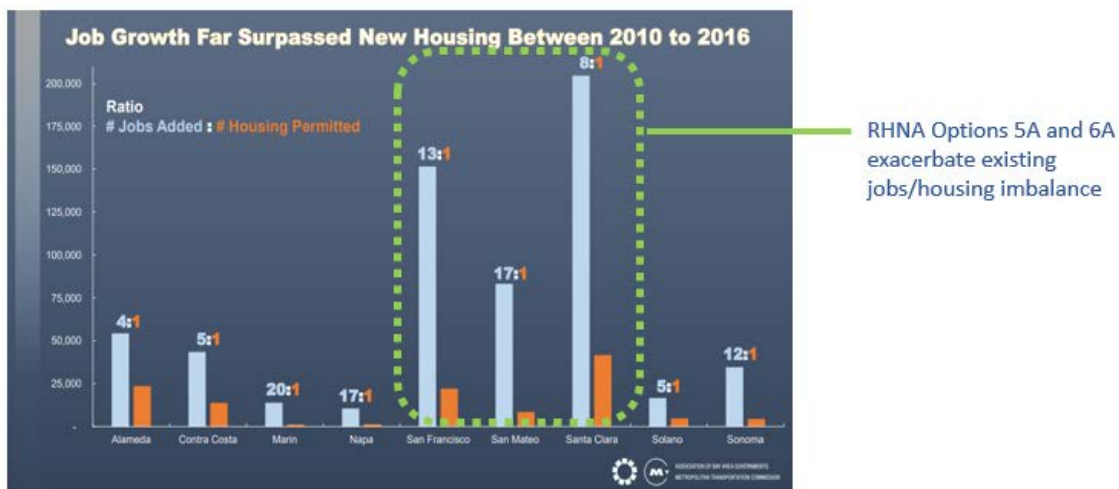


Figure 1.  Existing Jobs/Housing Imbalance (source: ABAG)

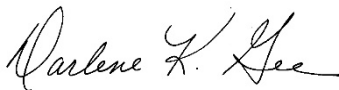| General Information | Administration | Planning | Parks & Recreation | Police | Public Works |
| --- | --- | --- | --- | --- | --- |
| (925) 253-4200 (ph) | (925) 253-4220 (ph) | (925) 253-4210 (ph) | (925) 254-2445 (ph) | (925) 254-6820 (ph) | (925) 253-4231 (ph) |
| (925) 254-9158 (fax) | (925) 254-2068 (fax) | (925) 253-7719 (fax) | (925) 253-7716 (fax) | (925) 254-9158 (fax) | (925) 253-7699 (fax) |

2. Allocating housing growth to suburban communities **ignores market demand** for housing in urbanized city centers with high-quality jobs. If the collective goal is to facilitate housing construction, then we strongly advocate for housing to be allocated where there is market demand.

3. Allocating housing growth communities at that interface with urban growth boundaries and green fields would pl**ace development pressures on undeveloped agricultural lands**. It would be *contrary* to the prioritizing in-fill development, avoiding areas with natural hazards, and **promotes urban sprawl**.

4. Lastly, allocating growth farther from quality job centers and **exacerbates the staggering commutes on workers**, placing an undue burden on working families and in many cases, increasing Vehicle Miles Traveled (VMT) in the region.

In summary, the City of Orinda recognizes the critical need to address a statewide housing affordability crisis and the responsibility of local cities to help address this issue that is critical to the quality of life for all residents. We believe in – and urge the Executive Board to consider - factors that:

a. **Allocate housing growth near job centers** (i.e., achieve a greater balance between the "jobs" and "housing" bars in the graphic on page 1). This reduces long commutes and allows development of a strong social/community fabric.

b. **Discourage housing growth near green fields and protected open space**, reducing development pressure at the urban growth boundaries.

c. **Discourage housing growth in small and rural communities** with limited land capacity, to avoid driving up land development costs and building near natural hazards.

With tremendous appreciation for your work, we thank you for your consideration.

Sincerely,

Darlene Gee
Mayor, City of Orinda

**Fred Castro**

| | |
|---|---|
| **From:** | Lisa Tarnow <LTarnow@cityofpleasantonca.gov> |
| **Sent:** | Tuesday, September 15, 2020 1:26 PM |
| **To:** | Arreguin, Jesse L.; Fred Castro |
| **Subject:** | Letter dated September 14, 2020 to Executive Board Chair Jesse Arreguin from the Tri-Valley Cities |
| **Attachments:** | Letter to ABAG Executive Board Chair Jesse Arreguin_ 9-14-20_final.pdf |

Dear Mayor Arreguin and Mr. Castro,

Please find the attached letter dated September 14, 2020, which is being sent at the request of the Tri-Valley cities of Danville, Dublin, Livermore, Pleasanton, and San Ramon.

Regards,
**Lisa Tarnow**
*Executive Assistant, City Manager's Office*
Direct: 925-931-5003 | Office: 925-931-5002
ltarnow@cityofpleasantonca.gov

City of Pleasanton | P.O. Box 520 |123 Main St., Pleasanton, CA 94566

# 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

development and socioeconomic equity, the protection of environmental and agricultural resources, and the encouragement of efficient development patterns.
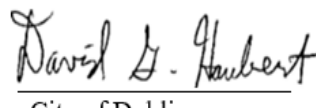
- The options push significant housing allocations into the outer ring of Bay Area suburbs, including the Tri-Valley, exacerbating the jobs/housing imbalance, and compelling long commutes to distant jobs centers. Even in our relatively jobs-rich Tri-Valley cities, data shows that many of our residents, 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).
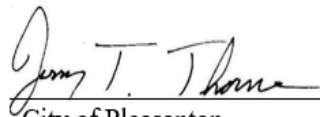
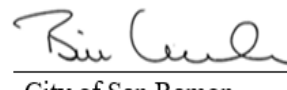Thank you for your consideration of these important concerns.

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