



*"Small Town Atmosphere
Outstanding Quality of Life"*

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

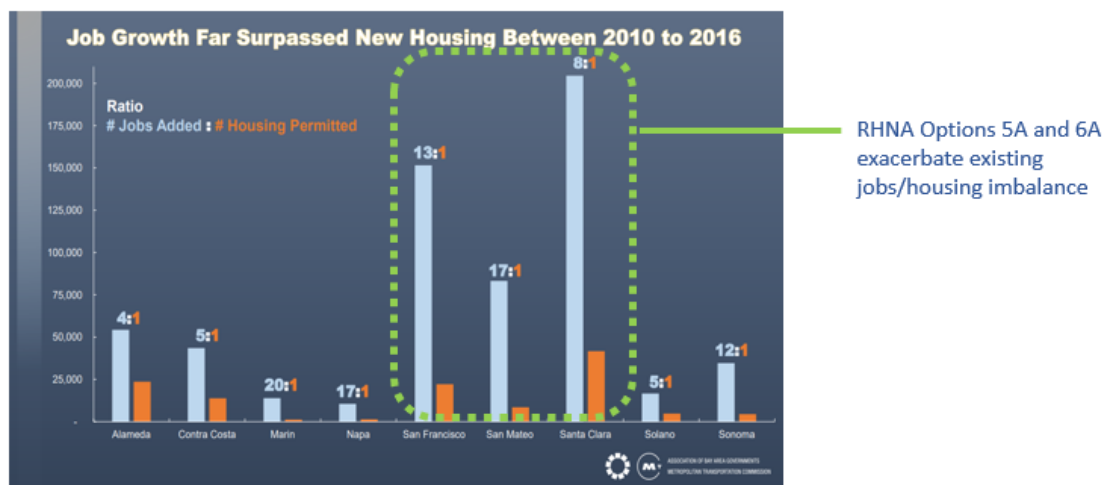
Dear President Arreguín:

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)



510 LA GONDA WAY, DANVILLE, CALIFORNIA 94526

Administration
(925) 314-3388

Building
(925) 314-3330

Engineering & Planning
(925) 314-3310

Transportation
(925) 314-3320

Maintenance
(925) 314-3450

Police
(925) 314-3700

Parks and Recreation
(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.

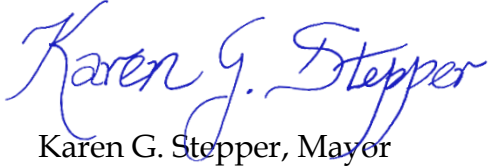
September 16, 2020

Page 3

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

Sincerely,

TOWN OF DANVILLE

A handwritten signature in blue ink that reads "Karen G. Stepper". The signature is fluid and cursive, with the first letters of each name being capitalized and prominent.

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:



4A068AE9F30A4FC...

MAYOR

APPROVED AS TO FORM:

DocuSigned by:



895C6C40ADB4BF...

CITY ATTORNEY

ATTEST:

DocuSigned by:



71735A3F04C942F...

CITY CLERK

Fred Castro

From: dianarelrod@gmail.com
Sent: Wednesday, September 16, 2020 10:56 AM
To: Therese W. McMillan; Gillian Adams; Dave Vautin
Cc: Fred Castro; 'Wolff, Greg'; 'Srivatsa, Niroop'; 'Robbins, Joanne'; 'Anderson, Mike'
Subject: FW: ABAG RHNA HCM Comment Letter & Resolution 2020-35
Attachments: Letter.ABAG.HousingMethodology.Sept.16.2020.pdf

External Email

Greetings,

On behalf of the City of Lafayette, attached please find a resolution and cover letter pertaining to the Housing Methodology Committee's work, which is expected to conclude this Friday. Please share this document with all members of the HMC.

Many thanks,



Diana R. Elrod Consulting

she/her/hers

Community Development * Land Use Implementation * Strategic Planning

DianaRElrod@gmail.com

415-214-2248

I acknowledge that I live and work on the unceded ancestral lands of the Ohlone, Ramaytush, and Costanoan sovereign nations.

From: Robbins, Joanne <JRobbins@ci.lafayette.ca.us>
Sent: Wednesday, September 16, 2020 10:23 AM
To: Wolff, Greg <GWolff@ci.lafayette.ca.us>
Cc: Diana Elrod (dianarelrod@gmail.com) <dianarelrod@gmail.com>; Srivatsa, Niroop <NSrivatsa@ci.lafayette.ca.us>; Anderson, Mike <MAnderson@ci.lafayette.ca.us>
Subject: RE: ABAG RHNA HCM Comment Letter & Resolution 2020-35

Thank you, Greg. Attached is the letter and resolution for Diana to submit to ABAG. I will mail the hard copies.

Joanne Robbins, CMC
City Clerk
City of Lafayette
3675 Mt. Diablo Blvd., Suite 210
Lafayette, CA 94549
925-284-1968
925-299-3210 (direct)



City Council

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

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,

A handwritten signature in dark ink, appearing to be 'a' followed by a long horizontal stroke.

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**

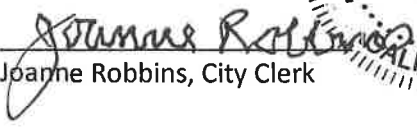
ABSTAIN: **None**

ABSENT: **Bliss**

APPROVED:


Mike Anderson Mayor

ATTEST:


Joanne Robbins, City Clerk



BEFORE THE TOWN COUNCIL OF THE TOWN OF MORAGA

In the Matter of:

Supporting the Contra Costa County)
Jurisdictions' Support for the Plan Bay)
Area 2050 Housing Allocation)
Methodology that Matches Housing)
Assignments Proximate to Job Centers)

Resolution No. 52 - 2020

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 nine 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.

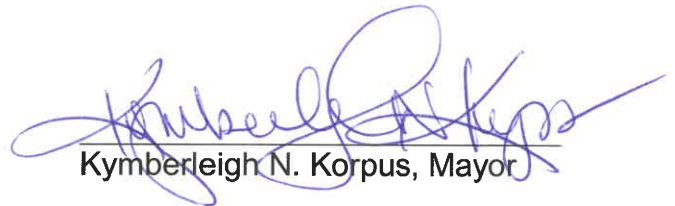
NOW, THEREFORE, BE IT RESOLVED that the Town of Moraga does hereby Resolve, Declare, Determine and Order the following:

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:

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

PASSED AND ADOPTED by the Town Council of the Town of Moraga at a regular meeting held on September 9, 2020 by the following vote:

AYES: Mayor Korpus, Vice Mayor McCluer, Councilmembers Sos, Woehleke and Wykle
NOES: None
ABSTAIN: None
ABSENT: None



Kimberleigh N. Korpus, Mayor

Attest:



Marty C. McInturf, Town Clerk

Fred Castro

From: Ramos, Belia <Belia.Ramos@countyofnapa.org>
Sent: Thursday, September 17, 2020 6:10 PM
To: Therese W. McMillan; Fred Castro; Jesse Arreguin
Subject: Fwd: Town of Moraga RHNA Housing Methodology
Attachments: 52-2020 Support for Plan Bay Area 2050 Housing Allocation Methodology.pdf; Letter to ABAG Final signed.pdf

External Email

Get [Outlook for iOS](#)

From: Afshan Hamid <ahamid@moraga.ca.us>
Sent: Thursday, September 17, 2020 6:02:25 PM
To: efigueroa@cityofmartinez.org <efigueroa@cityofmartinez.org>; info@bayareametro.gov <info@bayareametro.gov>; mayor@cityofberkeley.info <mayor@cityofberkeley.info>; Ramos, Belia <Belia.Ramos@countyofnapa.org>
Cc: Cynthia Battenberg <cbattenberg@moraga.ca.us>; twilliams@danville.ca.gov <twilliams@danville.ca.gov>
Subject: Town of Moraga RHNA Housing Methodology

[External Email - Use Caution]

Good Evening:

The Town of Moraga presented the RHNA methodology to Town Council on September 9, 2020 regarding support of the Plan Bay Area 2050 Baseline Data Methodology in support of Plan Bay Area 2050. The Town Council via resolution (see attached) supported the direction from the Contra Costa Mayors' Conference in support.



Afshan Hamid | AICP

Planning Director

925.888.7043

329 Rheem Blvd.

Moraga, Ca 94556

www.moraga.ca.us



Town of Moraga

MAYOR'S OFFICE

September 10, 2020

Jesse Arreguin, President
ABAG Executive Board
375 Beale Street, Suite 800
San Francisco, CA 94105-2006

RE: RHNA Housing Methodology

President Arreguin,

Thank you and the ABAG Housing Methodology Committee (Committee) for the tireless efforts on developing a way to distribute the Bay Area region's share of the Regional Housing Needs Determination (RHND) received from the California Department of Housing and Community Development.

We appreciate that this is a challenging task, with highly passionate voices advocating for social equity through this effort. To this end, we *endorse* the need for increased housing opportunities for all. However, we strongly urge the Executive Board 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***.

Consequently, we'd like to take this opportunity to reaffirm our support of the Contra Costa Mayors' Conference letter to the ABAG Committee, dated August 7, 2020 which endorses the use of "**Plan Bay Area 2050**" (rather than "2019 Baseline Household" 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 would not unravel other enduring decades-long commitments to environmental protection and traffic congestion relief.

With appreciation and respect,

Kimberleigh N. Korpus
Mayor, Town of Moraga

Fred Castro

From: Sheri Smith <ssmith@cityoforinda.org>
Sent: Wednesday, September 16, 2020 12:07 PM
To: MTC-ABAG Info
Subject: ABAG Housing Methodology Committee Mtg 9/18/20 - Communication from City of Orinda
Attachments: Letter to ABAG Board President from City of Orinda - RHNA Methodology.pdf

External Email

Hello President Arreguin, Please see attached letter from City of Orinda on Housing Allocation Methodologies for the next RHNA cycle. Thanks, Sheri

Sheri Marie Smith
City Clerk
City of Orinda
22 Orinda Way
Orinda, CA 94563
925-253-4221
ssmith@cityoforinda.org



22 Orinda Way • Orinda • California • 94563

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**:

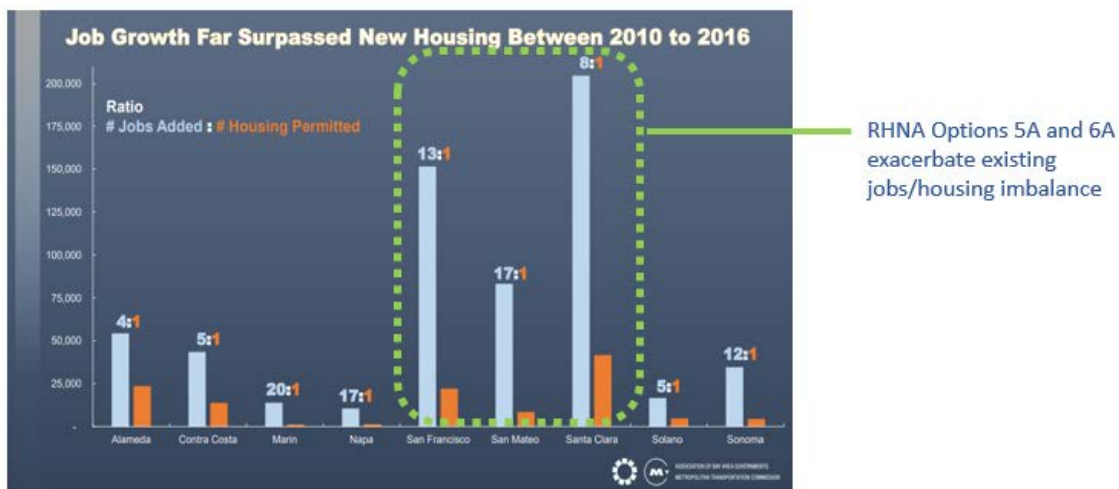


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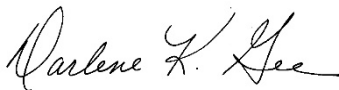
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3. Allocating housing growth communities at that interface with urban growth boundaries and green fields would **place development pressures on undeveloped agricultural lands**. It would be *contrary* to the prioritizing in-fill development, avoiding 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.
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- 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: Sheri Smith <ssmith@cityoforinda.org>
Sent: Wednesday, September 16, 2020 12:07 PM
To: MTC-ABAG Info
Subject: ABAG Housing Methodology Committee Mtg 9/18/20 - Communication from City of Orinda
Attachments: Letter to ABAG Board President from City of Orinda - RHNA Methodology.pdf

External Email

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Sheri Marie Smith
City Clerk
City of Orinda
22 Orinda Way
Orinda, CA 94563
925-253-4221
ssmith@cityoforinda.org



22 Orinda Way • Orinda • California • 94563

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

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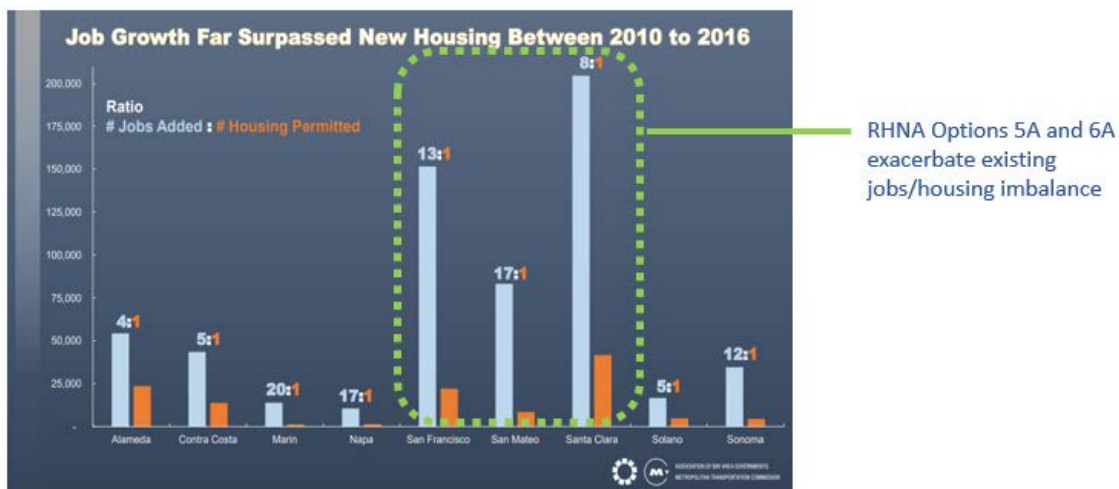


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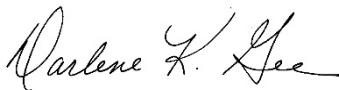
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In summary, the City of Orinda recognizes the critical need to address a statewide housing affordability crisis and the responsibility of local cities to help address this issue that is critical to the quality of life for all residents. We believe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

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- 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: Lait, Jonathan <Jonathan.Lait@CityofPaloAlto.org>
Sent: Thursday, September 17, 2020 4:55 PM
To: MTC-ABAG Info; Fred Castro; Regional Housing Need Allocation; rhna@TheCivicEdge.com
Cc: Shikada, Ed; Tanner, Rachael; French, Amy; Atkinson, Rebecca; Campbell, Clare
Subject: Comment Letter for Agenda Item 5a
Attachments: Preferred Methodology for 6th Cycle RHNA.pdf

External Email

Dear Housing Methodology Committee (HMC) Members, ABAG Regional Housing Needs Allocation Staff, and Fred Castro, Clerk of the Board, Association of Bay Area Governments,

The attached comment letter pertains to Item 5a on your September 18 HMC agenda, Recommending a Proposed RHNA Methodology.

Thank you for the opportunity to comment on and engage in this critical work effort.

Regards,

Jonathan Lait



CITY OF
**PALO
ALTO**

JONATHAN LAIT

Director

Planning and Development Services

(650) 329-2679 | jonathan.lait@cityofpaloalto.org

www.cityofpaloalto.org





OFFICE OF THE CITY MANAGER

250 Hamilton Avenue, 7th Floor
Palo Alto, CA 94301
650.329.2392

September 17, 2020

Housing Methodology Committee Members
Submitted Via Email To: info@bayareametro.gov

RE: Preferred Methodology for 6th Cycle RHNA

Dear Committee Members,

Thank you again for your tireless work. The City of Palo Alto supports an equitable distribution of housing to serve the Bay Area's future housing needs and the final alternatives being considered by the Committee come woefully short of achieving that goal.

It is fundamentally not reasonable to accept that some jurisdictions will bear the burden of increasing its housing stock upwards of 25% - 40% over the next eight years. Not since the end of World War II have established Bay Area communities seen such unprecedented growth. Beyond growth rate, consider the actual feasibility of adding 10,000 new housing units in a small to medium size jurisdiction. Higher property values, less land, less federal and state funding to subsidize housing, and known limitations on existing infrastructure all conspire against the ambitious and unachievable housing goals being contemplated by the Committee.

The City of Palo Alto supports bold initiatives and recognizes it has a role in providing more housing with access to transit, good paying jobs, education and affordable housing. Recommendations for a five-fold increase to some jurisdictions over current RHNA targets is a tacit endorsement that the region will fail to build the number of needed housing units. Not only will certain jurisdictions fail to meet their RHNA numbers, many more communities will not be required to produce more than they can actually build.

Corrective action is needed before the Committee forwards a recommendation to the ABAG Executive Board. The alternatives do not consider local constraints such as topography raised by the City of Piedmont. The alternatives also do not recognize the added housing pressure and other unique attributes of town and gown communities, such as the City of Palo Alto and Stanford University that lies predominantly within adjacent Santa Clara County. Future housing allocations must reconcile these adjacencies.

A limit or cap is needed for any alternative that results in unachievable housing allocations for any jurisdiction. Housing units beyond a reasonable cap must then be redistributed to other cities and counties that have substantially lower housing production targets.

While many of the factors under consideration by the Committee reflect critical planning principles, the City continues to question the fundamental pre-pandemic and recession attribution of where jobs are located, as well as where they will be in post pandemic and recession conditions. The pandemic has shown a significant outflux of workers from the City.



CityOfPaloAlto.org

Furthermore, we anticipate that a significant percentage of those workers will continue to work from home into the future, especially in light of local and County emphasis on telecommuting. Using the draft thirty year planning document to anticipate the needs for the next eight years under an unprecedented economic environment, public health crisis and adjustments in cultural norms defies explanation.

The City of Palo Alto encourages the Committee to serve in the capacity it was charged to lead and direct the work of ABAG staff to produce a more equitable and achievable housing distribution.

Thank you for your continued consideration.

Sincerely,



Ed Shikada
City Manager

CC:

Palo Alto City Council Members

ABAG Executive Board Members

Molly Stump, City Attorney, City of Palo Alto

Jonathan Lait, Director, Planning and Development Services Department, City of Palo Alto

ABAG Regional Housing Needs Allocation Staff, RHNA@bayareametro.gov

Fred Castro, Clerk of the Board, Association of Bay Area Governments,

fcastro@bayareametro.gov

rhna@TheCivicEdge.com

Fred Castro

From: Gillian Adams
Sent: Thursday, September 17, 2020 8:40 AM
To: Fred Castro
Cc: Dave Vautin; Eli Kaplan
Subject: FW: City of Sonoma Comments on 6th Cycle RHNA Methodology
Attachments: City of Sonoma Comments - RHNA Methodology.pdf

Importance: High

Hi Fred,

Another comment directed to HMC.

Thanks,
Gillian

From: Rebekah Barr <rbarr@sonomacity.org>
Sent: Thursday, September 17, 2020 8:20 AM
To: Regional Housing Need Allocation <rhna@bayareametro.gov>; Dave Vautin <DVautin@bayareametro.gov>; Gillian Adams <gadams@bayareametro.gov>; Ada Chan <achan@bayareametro.gov>; Paul Fassinger <pfassinger@bayareametro.gov>; City Council <citycouncil@sonomacity.org>; Planning Commission <planningcommission@sonomacity.org>
Cc: Cathy Capriola <ccapriola@sonomacity.org>; David Storer <dstorer@sonomacity.org>
Subject: City of Sonoma Comments on 6th Cycle RHNA Methodology
Importance: High

External Email

Good morning,
Please find attached comments by the City of Sonoma on the 6th Cycle RHNA methodology.

Regards,

Rebekah Barr, MMC

Rebekah Barr
City Clerk/Executive Assistant
1 The Plaza
Sonoma CA 95476
(707) 933.2216

City of Sonoma records, including emails, are subject to the California Public Records Act. Unless exemptions apply, this email, any attachments and any replies are subject to disclosure on request, and neither the sender nor any recipients should have any expectation of privacy regarding the contents of such communications.

City of Sonoma

No. 1 The Plaza
Sonoma California 95476-6690
Phone (707) 938-3681 Fax (707) 938-8775
E-Mail: cityhall@sonomacity.org



September 17, 2020

Housing Methodology Committee Members
VIA ELECTRONIC MAIL

ASSOCIATION OF BAY AREA GOVERNMENTS
375 Beale Street, Suite 700
San Francisco, CA 94105

Re: City of Sonoma Comments on 6th Cycle RHNA Methodology

Dear Mayor Arreguín, Housing Methodology Committee Members, and ABAG Staff:

The City of Sonoma appreciates your continued and assiduous efforts to develop a methodology for equitably allocating the San Francisco Bay Area's housing needs for the 6th Cycle Housing Element planning period. We know this effort is more challenging than in the past and we recognize the valuable contributions of staff and Housing Methodology Committee (HMC) members and the many hours that have been spent to get to where we are today. The City of Sonoma is fully committed to increasing the supply of housing and expanding the variety of housing types available in our community, including affordable housing. We provide below our initial staff comments to help you understand the dramatic effect upon our City should a significant increase in our assigned RHNA (as currently envisioned and projected using the "Visualization Tool") be adopted by the HMC on September 18th, 2020.

Sonoma has a rich past and was incorporated in 1883. However, it was laid out as a "pueblo" much earlier than that by General Vallejo in 1835 and had its first Town Council in 1844. Without belaboring the fact, Sonoma was and is the birthplace of the California Republic and home of the Bear Flag Rebellion in 1846.

Today, Sonoma has an area of 2.7 square miles and has a population (according to the State Department of Finance, Demographic Research Unit) of 11,050. The City lost population in 2019 of 114 people which translates (with a population per household of 2.10) to 54 households being lost. Of greater note, the City of Sonoma's population in 1970 was 4,112, meaning that its growth over the past 50-year period has been 6,938 people with an annual growth rate average of 139 people. Sonoma is known as a small and slow growing community.

Just as ABAG considers jobs, transit, and high opportunity areas as weighing factors in its model, land supply constraints and other factors also should be considered as outlined below:

1. The City of Sonoma is NOT “Urbanized” according to the US Census.¹

The reason for explaining the aforementioned small rate of growth above, is to articulate and support the fact that the City of Sonoma is not an urbanized city in spite of being lumped together with other cities in Sonoma County (and others in the Bay Area) when it comes determining an appropriate number of units in the forthcoming 6th Cycle RHNA process. As can be seen from the attached 2010 Census map, the City of Sonoma is NOT within an “Urbanized Area” as defined by the US Census in 2010 nor will it be in 2020 and must not be considered and treated as such.

Sonoma is 10.25 miles east of the Santa Rosa Urbanized Area - #79498 “as the crow flies” (near the southerly edge of the City of Cotati and the City of Santa Rosa), but more importantly, 8.5 miles from the Santa Rosa “Urbanized Area” along State Highway 12 corridor where it ends at the small locale of Kenwood in the unincorporated County. The southeasterly limits of the City of Santa Rosa are a total of 11 miles from Sonoma’s northwesterly city limits along that same State Highway 12 corridor.

2. The City of Sonoma is within a defined “Urban Cluster” along with the City of Cloverdale. The rest of the Cities within Sonoma County are within an “Urbanized Area”.

The City of Sonoma is located within an “Urban Cluster - #83008” as defined by the US Census (See attached 2010 Census map) and is the only City within the “Sonoma Valley”. Per the 2010 Census, Sonoma Valley had a total area of 12.43 square miles of which the City’s then and now total area of 2.7 square miles is 22% of the total. Sonoma Valley’s population in that same Census was 32,678 and the City of Sonoma’s was 10,648 – at just below 33% of the total. The Census also reported that the City of Sonoma had 5,544 households or 37.85% of Sonoma Valley’s 14,664 total household units. The City of Sonoma is basically one-third of the Sonoma Valley and has a much lower population per square mile than communities with the Santa Rosa “urbanized area”. As a comparison, Sonoma Valley’s population (which includes unincorporated County areas **and** the City of Sonoma) is 32,678, as compared to the aggregate “Urbanized” population of the Cities of Cotati, Healdsburg, Petaluma, Rohnert Park, Santa Rosa, Sebastopol and Windsor for a population of 338,000.

3. The City of Sonoma will receive a higher numerical increase of its RHNA than all 7 other Cities that are within an “Urban Cluster” within ABAG’s territory.

There is a total of 101 cities within ABAG’s territory and 7 of them are within designated “Urban Clusters”. This means that 94% of the Cities are within “Urbanized Areas”. These 7 “Urban Cluster” cities are listed below according to size of population:

¹ The Census Bureau identifies two types of urban areas: “urbanized areas” of 50,000 or more people and “urban clusters” of at least 2,500 and less than 50,000 people. There are 486 “Urbanized Areas” and 3,087 “Urban Clusters” nationwide. ABAG has 101 Cities within its 12 “Urbanized Areas” and 7 cities within its 7 “Urban Clusters”.

	<u>Name of Jurisdiction</u>	<u>County</u>	<u>Population (approx.)</u>	<u>Area in Sq. miles</u>
1.	Yountville	Napa	3,000	1.5
2.	Calistoga	Napa	5,000	2.6
3.	St. Helena	Napa	6,000	5.0
4.	Rio Vista	Solano	10,000	7.0
5.	CITY OF SONOMA	SONOMA	11,000	2.7
6.	Half Moon Bay	San Mateo	12,000	6.2
7.	Dixon	Solano	20,000	7.2

The above Cities need to be assigned a RHNA more in line with their size and the fact that they are designated as communities within an “Urban Cluster”

Based on preliminary calculations identified by ABAG staff in “Appendix 5: Comparison of Allocation Results”, dated September 3, 2020, the 7 “Urban Cluster” cities will be impacted as shown below (in order of numerical increase):

	<u>Name of jurisdiction</u>	<u>5th Cycle RHNA</u>	<u>6th Cycle RHNA</u>	<u>% increase</u>	<u>Num. Diff.</u>
1.	SONOMA	140	480	(243%)	340
2.	Dixon	200	500	(300%)	300
3.	Calistoga	30	280	(833%)	250
4.	Half Moon Bay	240	490	(104%)	250
5.	St. Helena	30	250	(733%)	220
6.	Yountville	20	120	(500%)	100
7.	Rio Vista	300	290	-(3.3%)	-10

As can be seen, the City of Sonoma has the highest numerical increase for the above listed seven small Cities that are within an “Urban Cluster”.

4. **The City of Sonoma is not considered “urbanized” by the Census, yet the current HMC methodology assigns LOWER (or equal) 6th Cycle RHNA’s to 13 cities that ARE considered “urbanized” by the Census. This is an illogical outcome. See chart below based on size of population of urbanized Cities that have a projected RHNA of 480 units or less:**

	<u>Jurisdiction</u>	<u>Population</u>	<u>5th Cycle</u> (RHNA)	<u>6th- Cycle</u> (RHNA)	<u>% increase</u>
1.	Belvedere	2,000	20	120	(500%)
2.	Colma	2,000	60	300	(400%)
3.	Ross	3,000	20	90	(350%)
4.	Monte Sereno	4,000	60	150	(150%)
5.	Portola Valley	5,000	60	200	(233%)
6.	Woodside	6,000	60	320	(433%)
7.	Atherton	7,000	90	360	(300%)

8. Fairfax	7,000	60	400	(566%)
9. Cotati	8,000	140	330	(135%)
10. Los Altos Hills	8,000	120	430	(258%)
11. Cloverdale	9,000	210	360	(71%)
12. Tiburon	10,000	80	480	(500%)
SONOMA	11,000	140	480	(340%)
13. Healdsburg	12,000	160	450	(181%)

5. The City of Sonoma is NOT a transit or jobs rich community as it is 15 miles (a 25-minute drive) away from the major North Bay travel corridor of US Highway 101 at Petaluma and 25 miles (a 40-minute drive) away from it in Santa Rosa.

Unlike other cities in Sonoma County (with the exception of the City of Cloverdale), the City of Sonoma is located 25 miles to the north from the connection with US Highway 101 in Santa Rosa and 15 miles to the US Highway 101 connection from the south in Petaluma. The City of Sonoma employs 38 people. The City's largest employer is Sonoma Valley Hospital with 360 employees.

Sonoma County Transit provides bus service between Sonoma, Sonoma Valley, and the US-101 Corridor. A major constraint to increased transit use is geography. Sonoma lies away from the major North Bay travel corridor along Highway 101, making express service to job centers such as Santa Rosa and San Francisco expensive. Sonoma Valley has a dispersed population and low densities that are not conducive to cost-effective transit provision. The data below demonstrates the low daily ridership of transit service to and from the City of Sonoma:

Transit service to and from Sonoma to Santa Rosa (Ridership for 6-month period)
September, 2019 thru February, 2020

Route #	Daily Average Ridership	Notes:
Route #30	251	To Santa Rosa. Operates from 5:50am to 7:30 pm weekdays with <u>90-minute headways</u> with 4 trips on Saturdays and Sundays from 8:15am to 5:00pm.
Route #32	202	Local service, no service on Sunday.
Route #34	15	To Santa Rosa. Commuter service only (one trip per direction). Monday through Friday with 1-4 trips. No service on Saturday or Sunday.
Route #38	7	To San Rafael Transit Center.
Route #40	28	To Petaluma Transit Mall.

Clearly, the City of Sonoma is not located in close proximity to job centers along major transportation routes to justify transit connections with more frequent headways.

The City of Sonoma is committed to adding housing and affordable housing for our community. Over the last few years, the City has allocated \$160,000 in funds from the City's recently established Housing Trust Fund (HTF) to be used for rental and utility payment assistance needs for Very Low Income, Low Income and Moderate Income households due to the declared COVID-19 Pandemic. In 2019 the City adopted non-residential impact fees for affordable housing and since 2003, has had a requirement for new subdivisions to include 20% of its units for households that are in the "low" and "moderate" income categories. Notwithstanding the above, the methodology under development by the HMC is not realistic and does not align with the broader policy goals of placing housing along transit and employment corridors.

The City of Sonoma will continue to search for creative solutions to substantially increase housing production in the future and we urge the HMC to continue to refine its model to include an adjustment or weighing factor for smaller cities that have been acknowledged by ABAG (through its prior forecasts) to have limited growth potential. Our community stands ready to plan for a higher RHNA than we've seen in the past and ask that you give due consideration to the factors listed above that inform local land use decisions.

If you have questions, please contact David Storer, Planning Director, at dstorer@sonomacity.org or 916-502-7341.

Sincerely,

CITY OF SONOMA



Cathy Capriola
City Manager



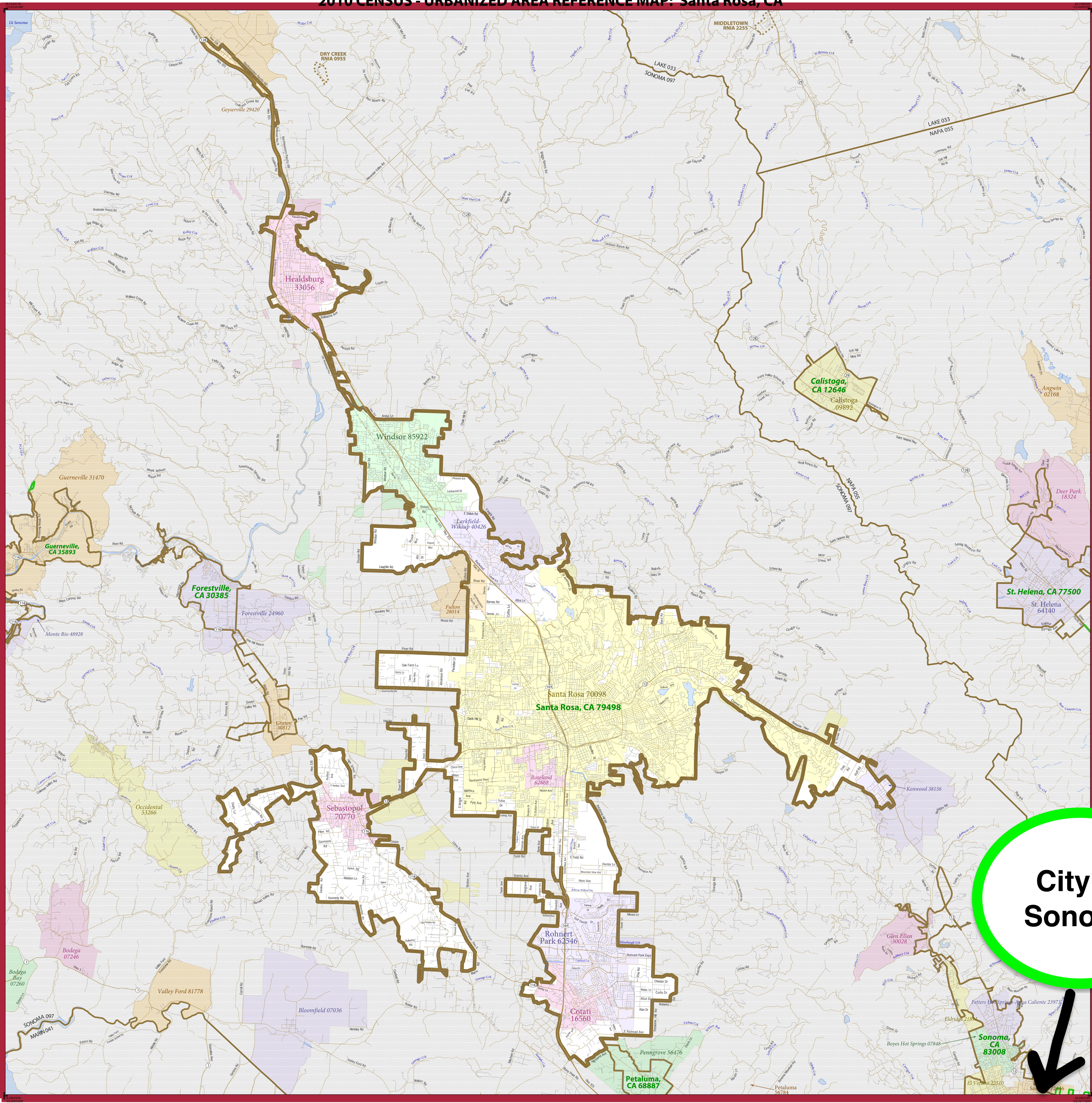
David A. Storer, AICP
Planning and Community
Services Director

Attachments:

- 1) Map – 2010 Census "Urbanized Area Reference Map: Santa Rosa, CA"
- 2) Map – 2010 Census "Urban Cluster Reference Map: Sonoma, CA"
- 3) Map – Administrative boundaries -

CC: City Council
Planning Commission
ABAG Regional Housing Needs Allocation Staff, via RHNA@bayareametro.gov
Dave Vautin, AICP, ABAG Assistant Director, Major Plans via dvautin@bayareametro.gov
Gillian Adams, Principal Planner, RHNA via gadams@bayareametro.gov
Ada Chan, ABAG Regional Planner, via achan@bayareametro.gov
Paul Fassinger, Regional Planning Program, Bay Area Metro, via pfassinger@bayareametro.gov

2010 CENSUS - URBANIZED AREA REFERENCE MAP: Santa Rosa, CA



LEGEND	
SYMBOL DESCRIPTION	LABEL STYLE
International	CANADA
Federal American Indian Reservation	L'ANSE RES 1880
Off-Reservation Trust Land	T1880
Urbanized Area	Dover, DE 24580
Urban Cluster	Toole, VT 88057
State (or statistically equivalent entity)	NEW YORK 36
County (or statistically equivalent entity)	ERIE 029
Minor Civil Division (MCD) ^{1,2}	Bristol town 07485
Consolidated City	MILFORD 47500
Incorporated Place ^{1,3}	Davis 18100
Census Designated Place (CDP) ²	Incline Village 35100

DESCRIPTION	SYMBOL	DESCRIPTION	SYMBOL
Intestate		Water Body	
U.S. Highway		Military	
State Highway		Outside Subject Area	
Other Road			
Railroad			
Perennial Stream			
Intermittent Stream			

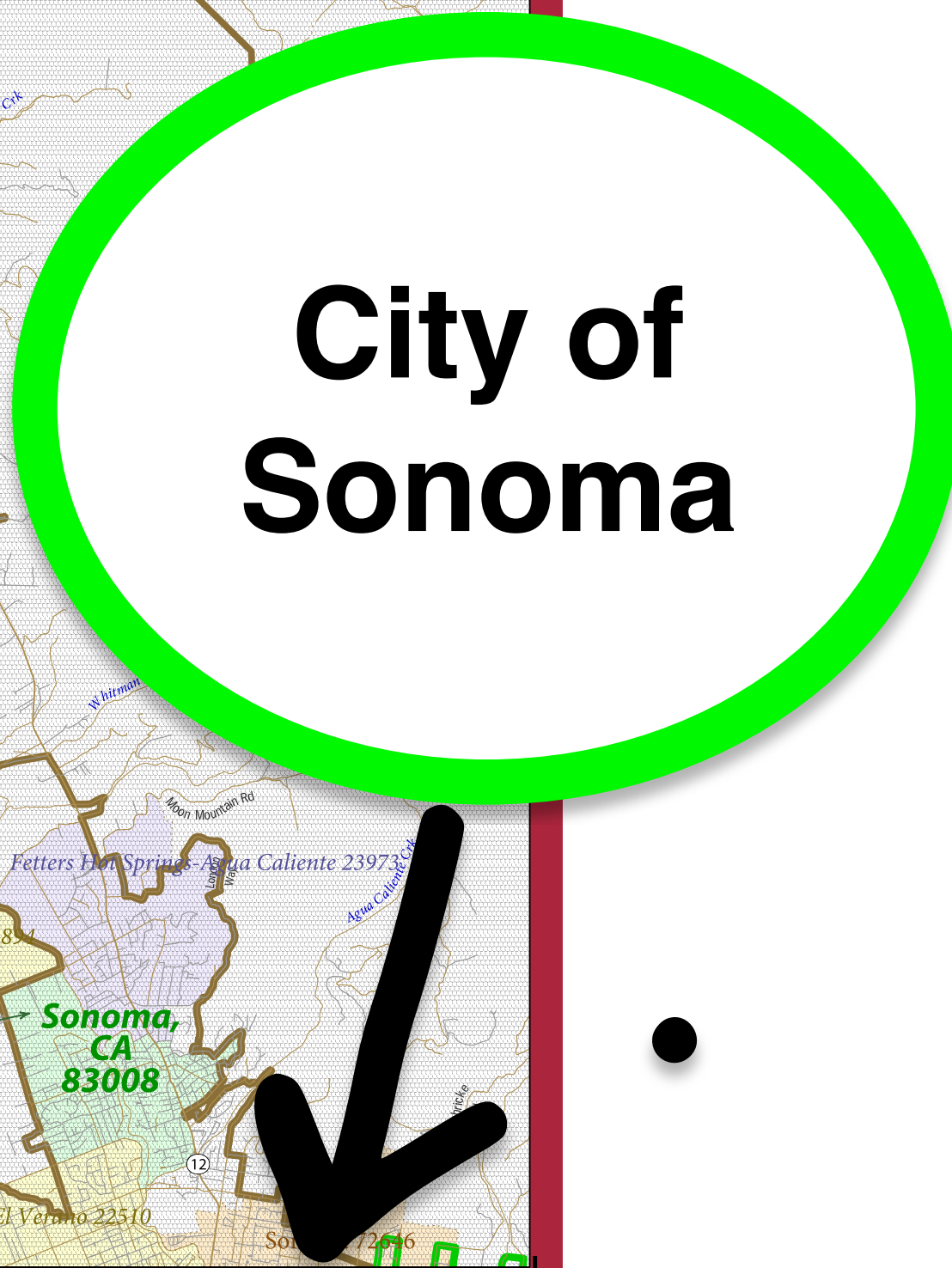
Where international, state, county, and/or MCD boundaries coincide, the map shows the boundary symbol for only the highest-ranking of these boundaries.

1 A ** following an MCD name denotes a false MCD. A ** following a place name indicates that a false MCD exists with the same name and FIPS code as the place; the false MCD label is not shown.

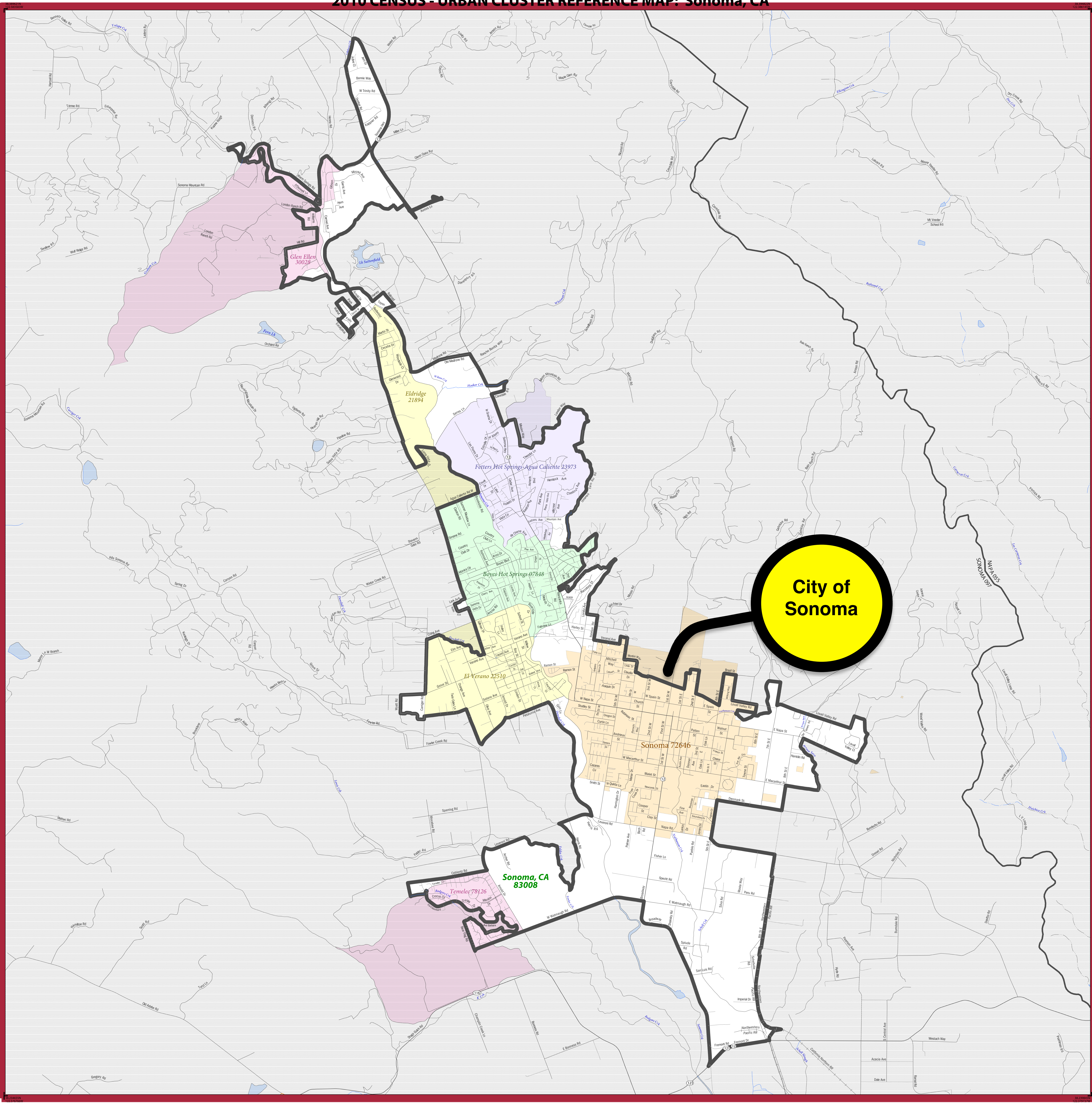
2 MCD boundaries are shown in the following states in which some or all MCDs function as general-purpose governmental units: Connecticut, Illinois, Indiana, Kansas, Maine, Massachusetts, Michigan, Minnesota, Missouri, Nebraska, New Hampshire, New Jersey, New York, North Dakota, Ohio, Pennsylvania, Rhode Island, South Dakota, Vermont, and Wisconsin. (Note that Illinois and Nebraska have some counties covered by nongovernmental precincts and Missouri has most counties covered by nongovernmental townships.)

3 Place label color corresponds to the place fill color.
Label colors: Davis Davis Davis Davis Davis

SUBJECT AREA COUNTIES ON MAP SHEET
06097 Sonoma



2010 CENSUS - URBAN CLUSTER REFERENCE MAP: Sonoma, CA



SYMBOL DESCRIPTION	SYMBOL	LABEL STYLE
International	-----	CANADA
Federal American Indian Reservation	L'ANSE RES 1880
Off-Reservation Trust Land	T1880
Urbanized Area	=====	Dover, DE 24580
Urban Cluster	=====	Tooele, VT 88057
State (or statistically equivalent entity)	-----	NEW YORK 36
County (or statistically equivalent entity)	-----	ERIE 029
Minor Civil Division (MCD) ^{1,2}	-----	Bristol town 07485
Consolidated City	MILFORD 47500
Incorporated Place ^{1,3}	Davis 18100
Census Designated Place (CDP) ²	Incline Village 35100

DESCRIPTION	SYMBOL	DESCRIPTION	SYMBOL
Interstate		Water Body	Pleasant Lake
U.S. Highway		Military	Fort Belvoir
State Highway		Outside Subject Area	
Other Road			
Railroad			
Perennial Stream			
Intermittent Stream			

Where international, state, county, and/or MCD boundaries coincide, the map shows the boundary symbol for only the highest-ranking of these boundaries.

1 A * following an MCD name denotes a false MCD. A ** following a place name indicates that a false MCD exists with the same name and FIPS code as the place; the false MCD label is not shown.

2 MCD boundaries are shown in the following states in which some or all MCDs function as general-purpose governmental units: Connecticut, Illinois, Indiana, Kansas, Maine, Massachusetts, Michigan, Minnesota, Missouri, Nebraska, New Hampshire, New Jersey, New York, North Dakota, Ohio, Pennsylvania, Rhode Island, South Dakota, Vermont, and Wisconsin. (Note that Illinois and Nebraska have some counties covered by nongovernmental precincts and Missouri has most counties covered by nongovernmental townships.)

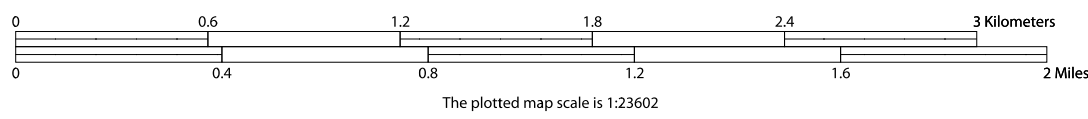
3 Place label color corresponds to the place fill color.
Label colors: Davis Davis Davis Davis Davis

SUBJECT AREA COUNTIES ON MAP SHEET
06097 Sonoma

All legal boundaries and names are as of January 1, 2010. Urban areas are based on results from the 2010 Decennial Census. The boundaries shown on this map are for Census Bureau statistical data collection and tabulation purposes only; their depiction and designation for statistical purposes does not constitute a determination of jurisdictional authority or rights of ownership or entitlement.

Geographic Vintage: 2010 Census (reference date: January 1, 2010)
Data Source: U.S. Census Bureau's MAF/TIGER database (TAB10)
Map Created by: Geography Division: March 11, 2012

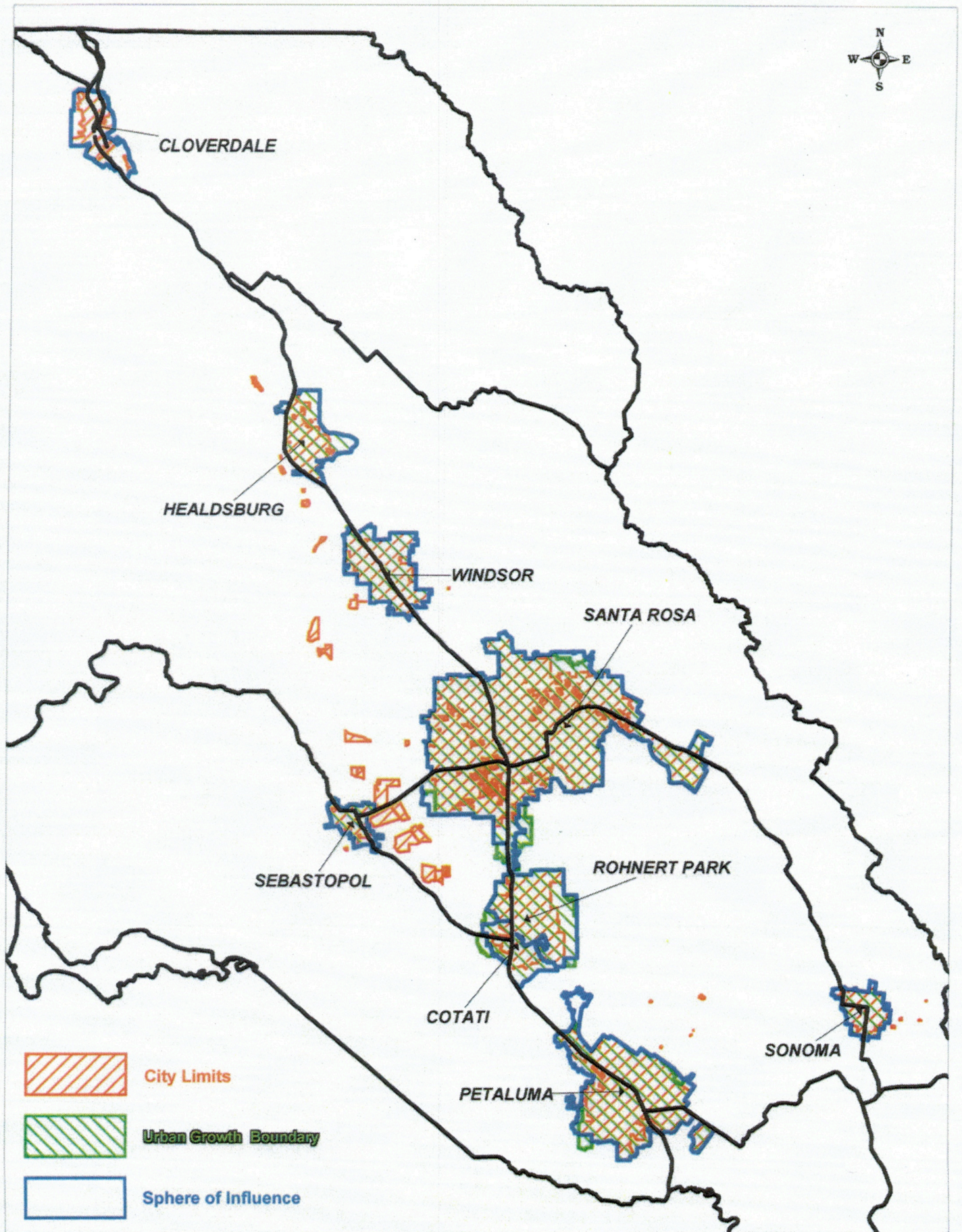
Projection: Albers Equal Area Conic
Datum: NAD 83
Spheroid: GRS 80
1st Standard Parallel: 34 06 27
2nd Standard Parallel: 40 25 20
Central Meridian: -119 18 20
Latitude of Projection's Origin: 32 31 43
False Easting: 0
False Northing: 0



PARENT SHEET 1
Total Sheets: 1
Index Sheets: 0
Parent Sheets: 1

UC NAME: Sonoma, CA
UC CODE: 83008
ENTITY TYPE: Urban Cluster (UC)
ST: California (06)

Sonoma County Administrative Area Boundaries



Fred Castro

From: Lisa Tarnow <LTarnow@cityofpleasantonca.gov>
Sent: Tuesday, September 15, 2020 1:39 PM
To: Fred Castro; mayor@cityofberkeley.info
Cc: rhna@thecivicedge.com; Gillian Adams
Subject: Letter to Housing Methodology Committee Chair Jesse Arreguin dated September 14, 2020
Attachments: Letter to HMC Chair Jesse Arreguin_ 9-14-20_final.pdf

External Email

Good afternoon, Mayor Arreguin and Mr. Castro:

Please find the attached letter dated September 14, 2020, from the Tri-Valley cities Danville, Dublin, Livermore, Pleasanton, and San Ramon.

Thank you,

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, 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



Tri-Valley Cities

DANVILLE • DUBLIN • LIVERMORE • PLEASANTON • SAN RAMON


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.

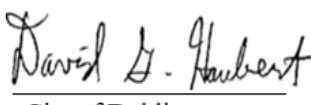
- The options push significant housing allocations into the outer ring of Bay Area suburbs, including the Tri-Valley, exacerbating the jobs/housing imbalance, and compelling long commutes to distant jobs centers. Even in our relatively jobs-rich Tri-Valley cities, data shows that many of our residents, 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).

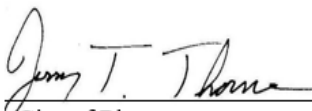
Thank you for your consideration of these important concerns.

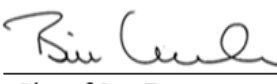
Respectfully,


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

