

City of Brisbane 50 Park Place Brisbane, CA 94005-1310 415-508-2100 415-467-4989 Fax

September 30, 2020

ABAG Planning Subcommittee 375 Beale Street, Suite 800 San Francisco, CA. 94105-2066

Subject: Proposed RHNA Methodology

Dear ABAG Planning Subcommittee;

The City of Brisbane is writing in opposition to the draft RHNA methodology as recommended for approval by the regional housing needs allocation (RHNA) Methodology Subcommittee on September 18, 2020. While the City understands the rationale for utilizing the 2050 household projections from draft Plan Bay Area 2050 (PBA 2050) as the baseline for determining RHNA allocations, as applied to Brisbane, it results in an unrealistic allocation that places an outsized burden on the City that will not result in increased housing production in the Bay Area region.

There are notable limits on Brisbane's ability to dramatically expand in size – the City is nestled up against the San Bruno Mountains which naturally creates barriers to housing development. The Baylands, the City's largest opportunity site for future housing, includes uses such as a tank farm that supports San Francisco International Airport, Recology's Solid Waste Facility serving San Francisco, aquatic resources such as Guadalupe Channel and Brisbane Lagoon, and Icehouse Hill which is home to protected wildlife, that will limit housing on the property. In addition, much of the land is heavily environmentally impacted by its previous use as a landfill and railyard. Clean up of the Baylands will be complicated and may take the better part of the upcoming RHNA cycle for portions of the land to be made suitable for housing development. And finally, the state's High Speed Rail Authority has identified the Baylands as a critical location for a train maintenance facility as they develop the peninsula portion of the rail line. These factors were not adequately taken into account in developing the projections for PBA 2050.

The City's objections to the proposed methodology is not an indication that the City is unwilling do to its part to address the regional housing shortage. In 2018, the residents of Brisbane voted to amend its General Plan to permit the development of housing on the Baylands and approximately double its population and number of housing units. No other City in the region has made this type of bold commitment to help solve the housing problem. And again, the City's residents did this knowing the development of the property, given the significant environmental impacts on the Baylands, will be a huge undertaking for the City in conjunction with the landowner.

PBA 2050 however, projects more than 9,000 households in Brisbane by 2050 where the City currently has approximately 1,900 households. That proposed methodology applied to this RHNA cycle would generate an estimated allocation of 2,819 units, within a single 8-year RHNA cycle. For context, our current RHNA obligation is 83 units of housing, and we've already started planning for more than 1,800 units. The PBA's projection that the City quadruple this commitment by 2050 is unrealistic given the geography of the City and impossible given the decades and costs of the environmental cleanup that would be required before most parts of the Baylands could even be suitable for housing. Having PBA 2050 as a starting point for Brisbane is the first step in a process that sets our City up to fail and to suffer the funding penalties for failure. Brisbane continues to work with ABAG to try to gain a better understanding of the factors behind the PBA 2050 projections and considering the limiting factors at play for Brisbane specifically, will improve the accuracy of the regional model.

The RHNA consequences of relying on these figures will be dire for the City of Brisbane. Establishing such an unattainable target will not increase housing production or further fair housing as the statutory objectives for the regional housing allocation require. Instead this target will put Brisbane in a perpetual state of failure that has real consequences for our residents that affect City planning, housing development allowances, and economic investment in the area. And when Brisbane is unable to meet this impossible allocation, it will mean the entire region continues to lag behind appropriate planning and development overall.

Do not confuse the City's objections to the proposed methodology as an indication that the City of Brisbane is unwilling do to its fair share (and more) to address the regional housing problem. We stand ready to do that in an environmentally responsible manner. In this spirit, the City of Brisbane looks forward to continuing these conversations with ABAG and getting to a result that is achievable for the City and the region.

Thank you for your consideration.

Sincerely, 00 mill

Terry O'Connell Mayor, City of Brisbane

ABAG Regional Planning Committee Oct 1 2020 Meeting Agenda Item 5.a. Comment Letter

Atkinson, Rebecca < Rebecca. Atkinson@CityofPaloAlto.org>

Wed 9/30/2020 4:48 PM

To: MTC-ABAG Info <info@bayareametro.gov>

Cc: Fred Castro <fcastro@bayareametro.gov>; Regional Housing Need Allocation <rhna@bayareametro.gov>; rhna@TheCivicEdge.com <rhna@TheCivicEdge.com>; Shikada, Ed <Ed.Shikada@CityofPaloAlto.org>; Lait, Jonathan <Jonathan.Lait@CityofPaloAlto.org>; Campbell, Clare <clare.campbell@cityofpaloalto.org>; French, Amy <Amy.French@CityofPaloAlto.org>; Tanner, Rachael <Rachael.Tanner@CityofPaloAlto.org>; Stump, Molly <Molly.Stump@CityofPaloAlto.org>; Council, City <city.council@cityofpaloalto.org>

1 attachments (361 KB)

City of Palo Alto Letter to RPC Agenda Item 5.a. 093020.pdf;

External Email

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

The attached comment letter from our City Manager pertains to Item 5.a. on your October 1 Regional Planning Committee agenda, Recommendation for Regional Housing Needs Allocation (RHNA) Proposed Methodology.

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

Regards,

Rebecca



Rebecca Atkinson, PMP, AICP, LEED Green Associate | Planner Planning & Development Services Department 250 Hamilton Avenue | Palo Alto, CA 94301 T: 650.329.2596 | F: 650.329.2154 | E: <u>rebecca.atkinson@cityofpaloalto.org</u>

Online Parcel Report | Palo Alto Municipal Code Planning Forms & Handouts | Planning Applications Mapped Date: September 30, 2020

ABAG Regional Planning Committee Members Submitted Via Email To: info@bayareametro.gov

RE: Recommendation for Regional Housing Needs Allocation (RHNA) Proposed Methodology – Agenda Item 5.a.

Dear Committee Members,

At your October 1st meeting you will consider the Housing Methodology Committee's (HMC) recommended regional housing needs methodology (RHNA). The City of Palo Alto appreciates the HMC's significant work effort, but is disappointed that the City's concerns have not been adequately addressed in the recommended methodology. Attached to this letter is the City's last communication to the HMC that highlights some of our concerns.

In addition to the attached document, the City has recently learned from at least one HMC committee member that the methodology has resulted in the unintended consequence of placing more housing units in Santa Clara and Sonoma Counties. In fact, the City of Palo Alto has been contacted by Santa Clara County to discuss its concerns and desire to seek a redistribution of housing units to nearby jurisdictions. The City of Palo Alto commends county staff for its engagement and interest in seeking regional solutions to address an obvious flaw in the methodology. Unfortunately it is unclear how this can be resolved outside of the process that the Regional Planning Committee is currently engaged. Importantly, a vote to forward the HMC's recommendation to the ABAG Executive Board ignores critical flaws with the methodology and renders attainment of our shared housing interests infeasible.

Moreover, the City has made requests to ABAG staff for jurisdiction-level data to better understand key datapoints and assumptions made that serve as the basis for the methodology model. While some interim information has been received, we are still awaiting other aspects.

The City of Palo Alto requests the RPC review the attached letter and redirect the momentum of this effort back to the HMC to address these outstanding concerns and come up with a methodology that reasonably distributes future housing growth within the Bay Area.

Thank you for your continued consideration.

Ed Shikada Ed Shikada: Gity Manager

-DocuSigned by:

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, <u>RHNA@bayareametro.gov</u> Fred Castro, Clerk of the Board, Association of Bay Area Governments, <u>fcastro@bayareametro.gov</u> rhna@TheCivicEdge.com



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.



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, <u>RHNA@bayareametro.gov</u> Fred Castro, Clerk of the Board, Association of Bay Area Governments, <u>fcastro@bayareametro.gov</u> rhna@TheCivicEdge.com

CITYOF SAN PABLO City of New Directions

September 15, 2020

OVERNIGHT DELIVERY

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



Re: RHNA BASELINE DATA METHODOLOGY

Dear ABAG Executive Board President Arreguín:

On behalf of the San Pablo City Council, please find enclosed City Council Resolution No. #2020-117 adopted on September 8, 2020 which supports the "Plan Bay Area 2050" as the baseline data for RHNA methodology (See Attachment).

The City of San Pablo wishes to convey our tremendous appreciation for the ABAG's 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 our support for utilizing the "Plan Bay Area 2050" as the baseline data methodology for the Contra Costa County region.

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 some of 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**:

13831 San Pablo Avenue, Building I ● San Pablo, CA 94806 Main: 510-215-3000 ● Fax: 510-215-3011 www.SanPabloCA.gov



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

- 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 and can result in displacement of existing affordable housing stock.

For San Pablo, which is just 2.4 sq. miles in size, the options proposed for consideration - **Option 5A** ("High Opportunity Areas & Jobs") and **Option 6A** ("Modified High Opportunity Areas Emphasis") would exacerbate displacement of existing low-income housing for lower income wage earners if the City is required to meet unattainable RHNA Housing Allocations Thresholds under these scenarios.

- 4. Allocating housing growth communities at the interface with urban growth boundaries and green fields would place development pressures on undeveloped agricultural lands. It would be *contrary* to prioritizing in-fill development and avoiding areas with natural hazards, and would promote urban sprawl.
- 5. Lastly, allocating growth farther from quality job centers **exacerbates the staggering commutes on workers**, placing an undue burden on working families.

In summary, San Pablo 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.

Mayor Jesse Arreguín, President ABAG Executive Board Association of Bay Area Governments page 3

- 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.

In conclusion, as you and the ABAG Executive Board work in conjunction with ABAG's HMC regarding the RHNA Baseline Methodology options, we respectfully urge your formal consideration in recognizing the "Plan Bay Area 2050" as the baseline data for RHNA Methodology that is the most attainable and is supported by the City of San Pablo, and unanimously by all the Mayors of the Contra Costa County region of local cities.

With tremendous appreciation for your Bay Area regional work, we thank you for your time and consideration.

Sincerely,

arturo Gu

Arturo M. Cruz, Mayor City of San Pablo

cc: San Pablo City Council City Manager Assistant City Manager Community & Economic Development Director

Attachment: (1) CC Resolution #2020-117 (Adopted 09/08/20)

RESOLUTION 2020-117

RESOLUTION OF THE CITY COUNCIL OF THE CITY OF SAN PABLO SUPPORTING THE CONTRA COSTA COUNTY JURISDICTIONS' SUPPORT FOR THE 'PLAN BAY AREA 2050' REGIONAL HOUSING NEEDS 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;

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);

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

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;

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

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

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

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 SAN PABLO CITY COUNCIL DOES HEREBY RESOLVE, DECLARE, DETERMINE AND ORDER THE FOLLOWING:

 Re-affirm the Contra Costa Mayors' Conference letter of support dated August 7, 2020 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
- Reduce greenhouse gas emissions, consistent with AB 32, SB 375 and the Metropolitan Transportation Commission's (MTC) Plan Bay Area 2050 policy framework.

BE IT FURTHER RESOLVED that the foregoing recitations are true and correct and are included herein by reference as findings.

ADOPTED this 8th day of September, 2020, by the following vote:

AYES:	COUNCILMEMBERS:
NOES:	COUNCILMEMBERS:
ABSENT:	COUNCILMEMBERS:
ABSTAIN:	COUNCILMEMBERS:

Kinney, Pineda, Xavier and Cruz None Pabon-Alvarado None

ATTEST:

APPROVED:

<u>/s/ LaTanya Fisher</u> LaTanya Fisher, Acting Deputy City Clerk <u>/s/ Arturo M. Cruz</u> Arturo M. Cruz, Mayor



City Council

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

May 11, 2020

Housing Methodology Committee Association of Bay Area Governments Bay Area Metro Center 375 Beale Street, Suite 800 San Francisco, CA 94105-2066

Dear Chair Arreguin and Members of the Housing Methodology Committee:

We wish to request that the Housing Methodology Committee work to address potential impacts of the COVID-19 pandemic in its allocation methodology. As this crisis is unprecedented in modern times, the effect of the pandemic on the economy cannot be overlooked. While we applaud efforts to move the projected timeline for the Department of Housing and Community Development (HCD) to release the allocation to sometime this summer, as opposed to the original target of April, the full impact on local economies by the COVID-19 virus may not be felt until later in the year. As such, any methodology developed for the allocation of units should be paused until a clearer picture of the economy emerges.

When the allocation process does resume at an appropriate time, the ultimate RHNA methodology should focus on the location of existing jobs (jobs-housing balance), not whether a job is accessible within 30 minutes by car or 45 minutes by transit. Countless hours of productivity are lost annually in the Bay Area due to traffic congestion; new housing production should not exacerbate the problem. In addition, job growth must be factored in to the RHNA allocation, as new jobs present a substantial factor in the housing crisis. With the COVID-19 outbreak, the outlook for job growth is murky, at best.

The methodology and future housing growth should capitalize on existing infrastructure and transit connectivity thereby reducing congestion, vehicle-miles traveled and greenhouse gas emissions. Any data supporting reducing long commutes, congestion, VMT, and greenhouse gas emissions would also illustrate that new housing should go where jobs are. Lastly, the region should avoid placing additional housing in areas with natural hazards like Very High Fire Hazard Zones and areas vulnerable to sea level rise.

We appreciate the Committee's willingness to consider these requests.

Sincerely Mike Anderson

Mayor

Page 1 of 2

C: Housing Methodology Committee Members: Josh Abrams, Susan Adams, Anita Addison, Rupinder Bolaria, Rick Bonilla, Michael Brilliot, Monica Brown, Amanda Brown-Stevens, Paul Campos, Ellen Clark, Diane Dillon, Forrest Ebbs, Pat Eklund, Jonathan Fearn, Victoria Fierce, Neysa Fligor, Mindy Gentry, Russell Hancock, Paolo Ikezoe, Welton Jordan, Megan Kirkeby, Brandon Kline, Jeffrey Levin, Scott Littlehale, Fernando Marti, Rodney Nickens, Jr., Julie Pierce, Bob Planthold, Darin Ranelletti, Matt Regan, Jane Riley, Carlos Romero, Elise Semonian, Aarti Shrivastava, Vin Smith, Matt Walsh

Therese Watkins McMillan, Executive Director, Association of Bay Area Governments Gillian Adams, Principal Planner, ABAG Regional Planning Program Keely Martin Bosler, Director, Department of Finance Therese Watkins McMillan, Executive Director, Association of Bay Area Governments Zachary Olmstead, Chief Deputy Director, Housing Policy Development Steve Glazer, State Senator, 7th District Rebecca Bauer-Kahan, Assemblymember, District 16



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,

Kymberleigh N. Korpus

Mayor, Town of Moraga

SEP 21 2020 EXECUTIVE DIRECTOR'S OFFICE



City of Pittsburg 65 Civic Avenue • Pittsburg, California 94565

September 11, 2020

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

RE: Regional Housing Needs Allocation (RHNA) Housing Methodology

President Arreguin,

The City of Pittsburg thanks you and the ABAG Housing Methodology Committee (HMC) for your efforts in developing a methodology 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 recognize that this is a formidable task, and one that will shape the region for years to come, with highly passionate voices advocating for social equity through this effort.

We also recognize the need for increased housing opportunities for all. However, we strongly believe that increasing housing alone does not adequately address the economic hurdles many in the region are facing, nor does it ensure the sustainability of the Bay Area and the quality of life our denizens deserve. To this end, the City of Pittsburg urges the Executive Board to advocate for increased housing opportunities without forsaking the region's enduring commitment toward reducing environmental impacts, long commutes, and greenhouse gas emissions.

The City of Pittsburg affirms support of the Contra Costa Mayors' Conference letter to the ABAG HMC, dated August 7, 2020, which endorses the use of "Plan Bay Area 2050" as the baseline methodology and encouraging housing development in proximity to jobs, which would in turn reduce transit and transportation congestion, helping to alleviate long region-wide commutes, and reduce greenhouse gas emissions in a manner consistent with both AB 32 and SB 375. Further, as part of any future housing strategy, we fully support policies that bring more jobs to eastern Contra Costa County.

Lastly, we advocate for HCD to allow jurisdictions to continue to count entitlements that exceed requirements from our current RHNA cycle toward their respective future allocations, as the dissolution of redevelopment agencies has eliminated most cities' ability to dictate development timelines.

We are thankful for your continuing facilitation and leadership and look forward to working with ABAG to help ensure that this effort does not unravel other enduring commitments to environmental protection and traffic congestion relief.

Sincerely,

Jelani Killings Mayor

Holland Barrett White Councilmember

a Merl Craft

Vice Mayor

Shanelle Scales-Preston Councilmember

(Juan Antonio Banales Councilmember

