



ABAG-MTC Staff Response to *City of San Ramon* RHNA Appeal

ABAG Administrative
Committee

September 29, 2021

Overview of City of San Ramon Appeal

Appeal Request:

- Reduce allocation by 1,450 units (28%) from 5,111 units to 3,661 units.

Staff Recommendation:

- Deny the appeal.

Appeal bases cited:

- ABAG failed to adequately consider information submitted in the Local Jurisdiction Survey.
- ABAG failed to determine the jurisdiction's Draft Allocation in accordance with the Final RHNA Methodology and in a manner that furthers, and does not undermine, the RHNA Objectives.

Issue #1: Jobs-Housing Relationship

Jurisdiction Argument: Adoption of CityWalk Master Plan in August 2020 makes jobs projections used in Plan Bay Area 2050 Final Blueprint and RHNA Methodology outdated and incorrect. COVID-related jobs loss and decreased transit service are change in circumstances that warrants RHNA reduction to improve jobs-housing balance.

ABAG-MTC Staff Response:

- Changes to CityWalk Master Plan do not affect City's RHNA because CityWalk is located in San Ramon's PDA. Plan Bay Area 2050 Final Blueprint strategies adopted by the ABAG Board applied increased density and intensity assumptions in a consistent manner based upon transit access and resource level.
- Job Proximity - Transit factor in RHNA Methodology is based on number of jobs observed in 2015. Assumptions about future changes in jobs have no impact on San Ramon's allocation.
- Impacts from COVID-19 are not a valid basis for an appeal.

Issue #2: Impact of Recent Annexations

***Jurisdiction Argument:** San Ramon has had two annexations since 2016 and it is unclear whether these were included in the Final Blueprint and the resulting baseline allocation for the RHNA Methodology.*

ABAG-MTC Staff Response:

- Annexation DV 17 was included in all modeling for the Plan Bay Area 2050 Final Blueprint.
- Annexation DV 18 occurred after modeling for the Final Blueprint, so the area was included as part of Contra Costa County when calculating RHNA baselines.
- **However:** the Final Blueprint did not forecast any households in this area in 2050, so a shift of jurisdictional responsibility from the County to San Ramon would have no impact on either jurisdiction's RHNA allocation.

Issue #3: Lack of Available Land

Jurisdiction Argument: High Resource Area Growth Geographies in Plan Bay Area 2050 Final Blueprint do not adequately consider land use constraints and development feasibility, San Ramon's RHNA overestimates the City's ability to accommodate growth.

ABAG-MTC Staff Response:

- Government Code Section 65584.04(e)(2)(B) states:
 - ABAG may not limit consideration of suitable housing sites to a jurisdiction's existing zoning and land use restrictions and must consider potential for increased residential development under alternative zoning ordinances and land use restrictions.
 - Jurisdictions must consider underutilized land, opportunities for infill development, and increased residential densities as a component of available land for housing.
- San Ramon does not provide evidence it is unable to consider underutilization of existing sites, increased densities, accessory dwelling units (ADUs), and other planning tools to accommodate more housing.

Recommended Action for City of San Ramon Appeal

Deny the appeal filed by the City of San Ramon to reduce its Draft RHNA Allocation by 1,450 units.

- ABAG considered information submitted in the local Jurisdiction Survey consistent with how the methodology factors are defined in Government Code Section 65584.04(e).
- The jurisdiction's Draft RHNA Allocation is in accordance with the Final RHNA Methodology adopted by the ABAG Executive Board and approved by HCD and furthers the RHNA Objectives identified in Government Code Section 65584(d).