



# City of Belvedere


RHNA Appeal

September 29, 2021

CITY OF BELVEDERE  
GENERAL PLAN  
AVAILABLE LANDS INVENTORY

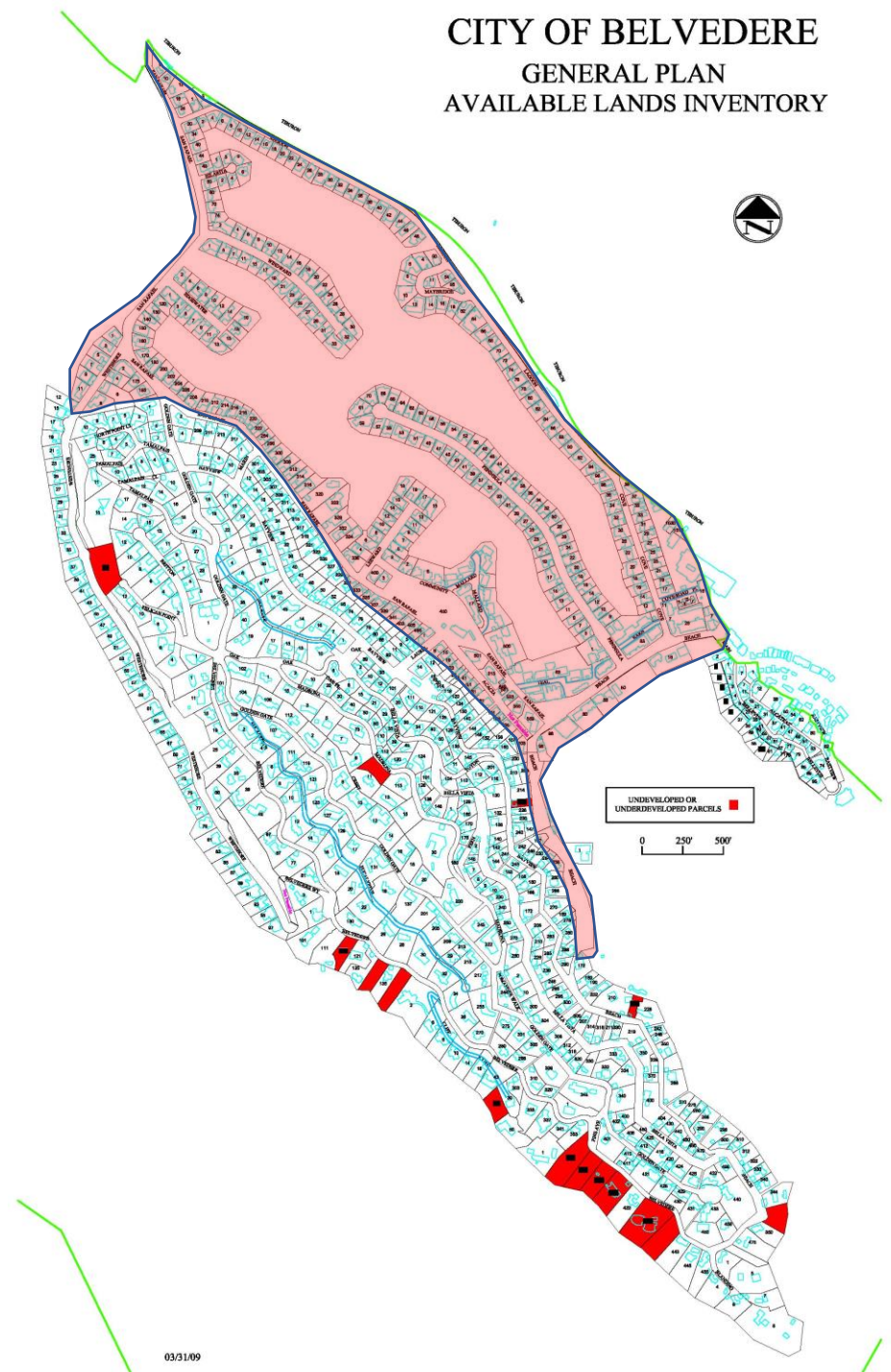


UNDEVELOPED OR  
UNDERDEVELOPED PARCELS



0 250' 500'

- Belvedere is a small city consisting of two islands and a lagoon connected to the Tiburon peninsula by two causeways.
- Currently, 933 households.
- Approximately half of the land area is in a 100-year flood zone, is vulnerable to sea level rise, and/or is highly vulnerable to liquefaction.
- Islands have steep slopes, and many roads are single lane.
- 98.3% of parcels are developed.
- Only 16 parcels are vacant.
- Of these, only 8 are over .5 acres (i.e., suitable for lower income, multifamily development), and all are on steep hillside lots with highly constrained evacuation and emergency route access.



- City was allocated 160 units.
- The RHNA Allocation Methodology fails to consider environmental constraints and actual vacant and suitable land available for development in Belvedere.
- The RHNA Allocation Methodology fails to consider water service capacity.
  - The RHNA for the Marin Municipal Water District's service area exceeds the population planned for in the Marin Municipal Water District's 2020 Urban Water Management Plan by 32%.
- The RHNA Allocation Methodology appears to over allocate units to Belvedere because it is a "Transit Rich Area" even though there is only very limited ferry service serving less than 1% of the total Golden Gate Ferry ridership.
- The RHNA Allocation Methodology was unfairly applied to Belvedere.



### 3 Components of RHNA

1. Baseline Allocation “based on each jurisdiction’s share of the region’s total households in the year 2050 from the Plan Bay Area 2050 Final Blueprint”. RHNA Plan identifies this as 0.0%
2. Factors Modify the Allocation:
  - Access to High Opportunity Areas (AHOA). Belvedere’s factor is 1.5
  - Jobs Proximity – Auto (JPA). Belvedere’s factor is 0.6
  - Jobs Proximity – Transit (JPT). Belvedere’s factor is 0.5
3. Equity Adjustment. Not applied to Belvedere.

**The City takes issue with the Baseline Allocation, not the other components of RHNA.**

- Obviously, 0.0% is not the baseline allocation used in the RHNA formula, or RHNA would be 0.
- Working the equation backwards, we determine baseline allocation must be 0.034% to generate 160 units.
- 0.034% of the region’s households in 2050, as identified in the Final Blueprint Growth pattern, is 1,373 housing units. **This is a 48% increase over the 2015 level.**



- The Final Blueprint Growth Pattern identifies a 21% growth rate for the South Marin “superdistrict,” of which Belvedere is a part.
- There are no other official projections for individual cities.
- ABAG staff apparently determined individual growth rates for the cities and towns but would not share those growth rates or explain the rationale for them.
- Belvedere’s growth rate may have been inflated due to the determination of the city being a “Transit Rich Area within a High Resource Area.” However, the methodology factors (AHOA, JPA, JPT) and the equity adjustment are supposed to adjust for these conditions. Adjusting the baseline allocation to reflect these conditions is not fair or transparent. Nor does it reflect the spirit of the RHNA Methodology adopted by the Housing Methodology Committee.
- Belvedere’s allocation should reflect the superdistrict’s growth rate of 21%. This would result in 130 units, after applying the equity adjustment.
- The City therefore requests a reduction in its RHNA allocation of 30 units.

PLAN BAY AREA 2050			GROWTH PATTERN				
			PROJECTED HOUSEHOLDS				
COUNTY	SUPER-DISTRICT	SUPERDISTRICT NAME	2015	2050	GROWTH	PERCENT GROWTH	SHARE OF REGIONAL GROWTH
San Francisco	1 to 4	San Francisco County (Combined)	366,000	578,000	213,000	+58%	16%
San Mateo	5	North San Mateo County	98,000	166,000	68,000	+70%	5%
	6	Central San Mateo County	87,000	121,000	34,000	+39%	2%
	7	South San Mateo County	80,000	106,000	26,000	+32%	2%
Santa Clara	8	Northwest Santa Clara County	74,000	102,000	28,000	+38%	2%
	9	North Santa Clara County	107,000	320,000	212,000	+199%	16%
	10	West Santa Clara County	121,000	172,000	51,000	+42%	4%
	11	Central Santa Clara County	105,000	168,000	63,000	+60%	5%
	12	East Santa Clara County	108,000	180,000	72,000	+67%	5%
	13	Central South Santa Clara County	73,000	91,000	18,000	+25%	1%
Alameda	14	South Santa Clara County	35,000	43,000	8,000	+24%	1%
	15	East Alameda County	72,000	132,000	60,000	+82%	4%
	16	South Alameda County	105,000	152,000	47,000	+45%	3%
	17	Central Alameda County	120,000	160,000	40,000	+33%	3%
	18	North Alameda County	181,000	287,000	107,000	+59%	8%
Contra Costa	19	Northwest Alameda County	73,000	115,000	42,000	+57%	3%
	20	West Contra Costa County	89,000	123,000	34,000	+38%	2%
	21	North Contra Costa County	85,000	134,000	49,000	+58%	4%
	22	Central Contra Costa County	60,000	89,000	28,000	+47%	2%
	23	South Contra Costa County	55,000	70,000	15,000	+28%	1%
	24	East Contra Costa County	94,000	136,000	42,000	+45%	3%
Solano	25	South Solano County	53,000	57,000	5,000	+9%	0%
	26	North Solano County	89,000	119,000	30,000	+34%	2%
Napa	27	South Napa County	34,000	40,000	5,000	+15%	0%
	28	North Napa County	16,000	16,000	0	+0%	0%
Sonoma	29	South Sonoma County	64,000	83,000	19,000	+30%	1%
	30	Central Sonoma County	88,000	98,000	10,000	+11%	1%
	31	North Sonoma County	36,000	39,000	3,000	+9%	0%
Marin	32	North Marin County	23,000	30,000	7,000	+28%	0%
	33	Central Marin County	44,000	66,000	22,000	+50%	2%
	34	South Marin County	41,000	50,000	9,000	+22%	1%
REGION			2,677,000	4,043,000	1,367,000	+51%	100%