



RHNA Appeal

City of Mill Valley

October 8, 2021

Al Piombo, City Manager

Patrick Kelly, Planning & Building Director

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Basis for Appeal #1

Allocations Do Not Meet Statute



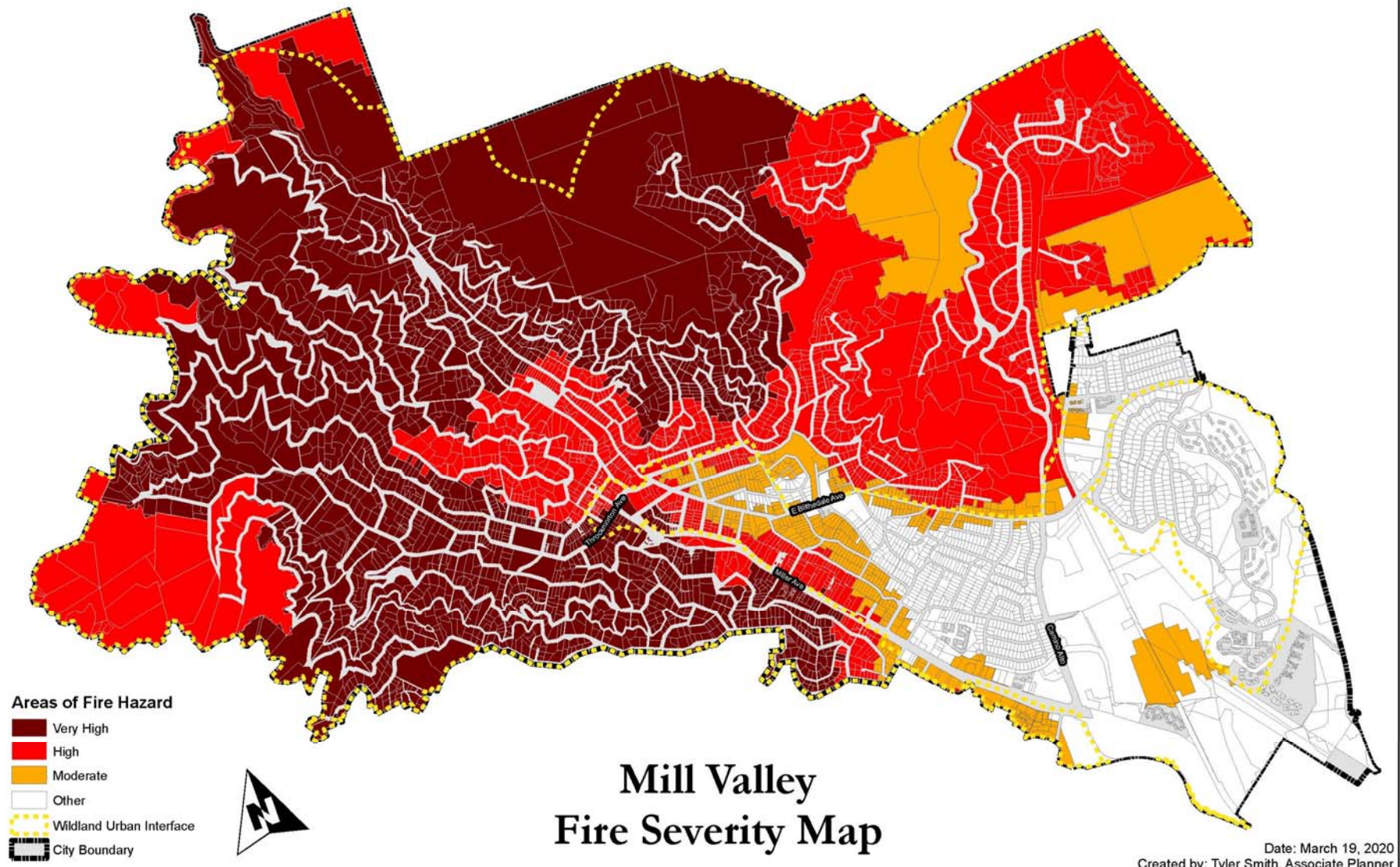
1A. RHNA Statutory Objective #2 Not Met

“infill development and socio-economic equity should be promoted through efficient development patterns that achieve greenhouse gas emission targets and protect environmental and agricultural resources.”

1B. Focus on Transit-Rich High Resource Areas

- Small eastern portion of Mill Valley is high-resource and near transit served by express buses running along US Route 101
- Very little of the overall City is within the growth geographies

Majority of Mill Valley Land in High Fire Severity Zones



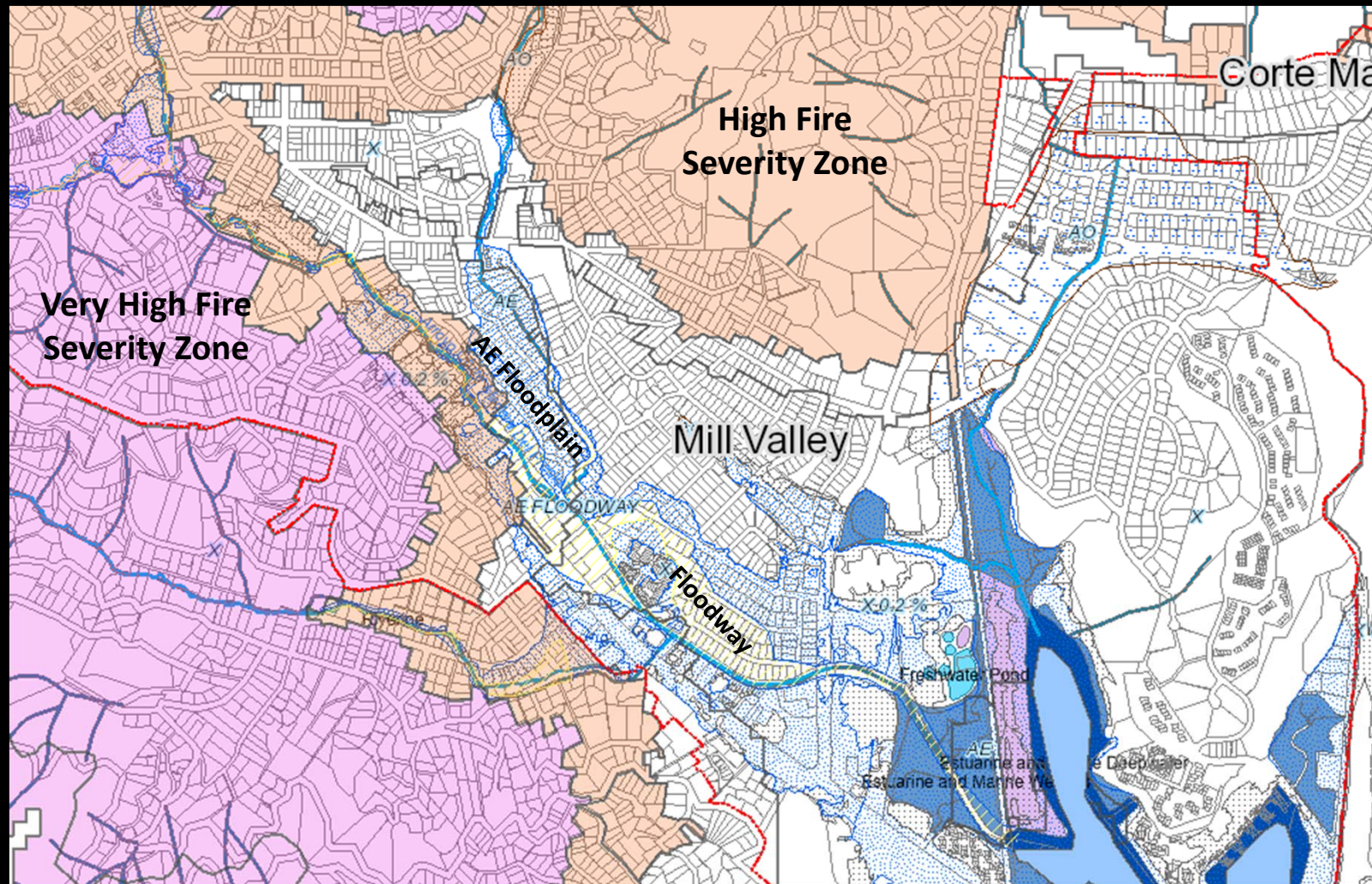
230 Rose Ave
Mill Valley, California
[View on Google Maps](#)



Very/High Fire Severity Zones

- Majority of roadways less than 16'
- Largely sloped with large amount of forested area
- SAFETY a KEY concern. Continued interest and concern at the local level about safety, emergency access and safe egress out of hillsides during evacuations

65% Land in Very/High Fire Zones or Floodway



Environmental Criteria Not Satisfied, Explained or Fully Considered

- Draft allocations did not adequately consider environmental hazards and constraints.
- How was Mill Valley's RNHA adjusted to reflect 65% of its land located in a High Fire Severity Zone and FEMA Floodway?

Environmental hazards and constraints have not been satisfied in Draft Allocations

	Distribution 1: High Opportunity Areas	Distribution 2: Job Proximity Auto	Distribution 3: Job Proximity Transit	Equity Adjustment	Environment and Hazard Adjustment
Very Low Income	70%	15%	15%		?
	197	20	14	10	
Low Income	70%	15%	15%		
	114	11	8	7	
Moderate Income	40%	60%			
	72	50			
Above Moderate Income	40%	60%			
	185	130			
Total	568	211	22	17	

Basis for Appeal #2:

Local Planning Factors Not Met



RHNA does not adequately consider local survey responses about **local barriers** including:

1. **Hazards:** Majority of Land (65%) in V/HFSZ or FEMA Floodway
2. **Lot size:** In areas outside V/HFSZ are less than $\frac{1}{4}$ area and not vacant
3. **Built-Out Conditions.** 97% of parcels are NOT vacant



Example: Typical lot size along the City's transit corridor on Miller Avenue. Four-plex and six-plex built at 22-25 units/acre

Basis for Appeal #3: *Changed Circumstances: Fire Hazards*



Increased Fire Risk

In 10 years, 1 of every 8 acres in California has burned

(SJ Mercury News, Sept. 29, 2021)

Fire Hazard Planning Technical Advisory, 2020 Update:

“Avoid expanding new development, critical facilities, and infrastructure in areas subject to extreme threat or high risk, such as High or Very High Fire Severity Zones ...”

Basis for Appeal #3:

Changed Circumstances: Population



CA Population Trending Downward

- *“Between 2010 and 2020, the national population increased by 7.4% to 331.4 million... That’s the second smallest increase in the 24 decades the census has been done.*
- **California’s population grew by even less, just 5.9%, from 37.3 million to 39.5 million residents”.**

(CalMatters article, April 2021)

Summary



- 1. Statutory Objectives Not Met**
- 2. Local Barriers not Addressed**
- 3. Fire Severity and Hazards Not Addressed**

Allocations do not adequately address local barriers and statutory objectives to allocate housing near transit and outside of environmental hazard zones.

- How was Mill Valley's RNHA adjusted to reflect 65% of its land located in a High Fire Severity Zone and FEMA Floodway?*

Requested Revision to MV RHNA



1. Acknowledge limited MV area in “growth geography”
2. Add hazards distribution factor
3. Adjust “job proximity to transit and auto” removing those parcels within Flood and Fire hazard areas.

	ABAG Methodology	Total Draft Allocation	City Appeal
Very Low Income	231	252	223
Low Income	133	144	129
Moderate Income	122	126	77
Above Moderate Income	315	326	150
Total	818	865	579