

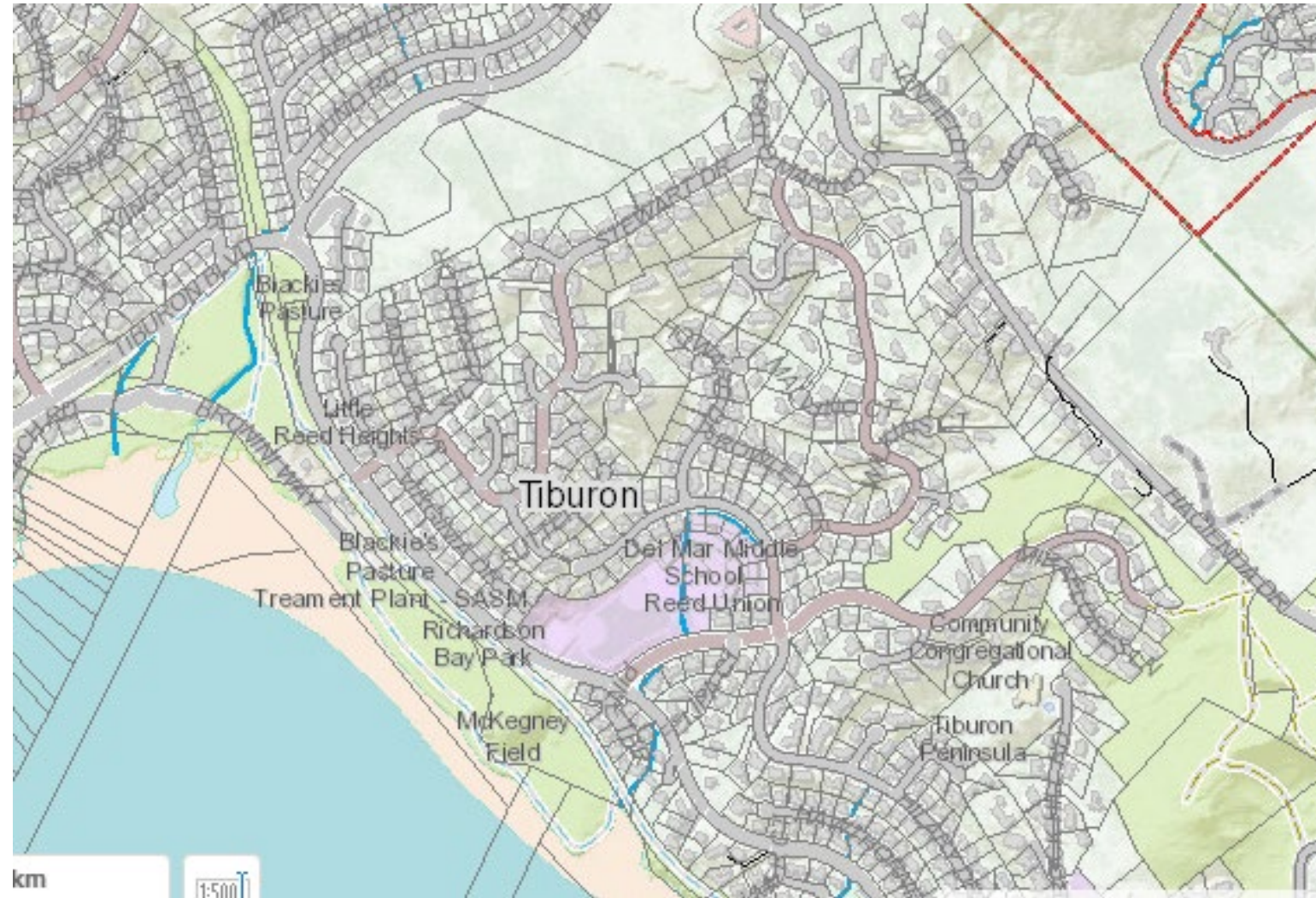


# Town of Tiburon

RHNA Appeal

October 15, 2021

- Tiburon was allocated 639 units – more than 8x its last allocation of 72 units.
- Tiburon is mostly built out. The few remaining vacant parcels are primarily in the hills, are located on steep slopes, and have poor access.
- There are no vacant parcels that will meet HCD's requirements for adequate sites suitable for lower income, multifamily housing.
- Request is for a reduction of 103 units.





1. The RHNA Allocation Methodology fails to consider environmental constraints and actual vacant and suitable land available for development in Tiburon.
2. 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%.
3. The RHNA Allocation Methodology over allocates units to Tiburon in the baseline allocation 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.
  1. Only two commuter trips to San Francisco and back each day.
  2. No vacant land within ½ mile of ferry dock.
  3. Land is subject to flooding, sea level rise, and liquefaction.



### 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”.
2. Factors Modify the Allocation:
  - Access to High Opportunity Areas (AHOA). Tiburon’s factor is 1.5
  - Jobs Proximity – Auto (JPA). Tiburon’s factor is 0.6
  - Jobs Proximity – Transit (JPT). Tiburon’s factor is 0.5
3. Equity Adjustment. Not applied to Tiburon.

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

- Incomplete information forced the Town to work the equation backwards to determine the baseline allocation.
- Baseline allocation must be 0.136% to generate 639 units.
- 0.136% of the region’s households in 2050, as identified in the Final Blueprint Growth pattern, is 5,498 households. **This is a 47% increase over the 2015 level.**

- The Final Blueprint Growth Pattern identifies a 21% growth rate for the South Marin “superdistrict,” of which Tiburon is a part.
- There are no other official projections for individual cities.
- ABAG staff determined individual growth rates for the cities and towns but would not share those growth rates or explain the rationale for them.
- Tiburon’s growth rate was 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 methodology as described in the Draft RHNA Plan.
- Tiburon’s allocation should reflect the superdistrict’s growth rate of 21%. This would result in 536 units, after applying the equity adjustment.
- The Town therefore requests a reduction in its RHNA allocation of 103 units.

PLAN BAY AREA 2050			GROWTH PATTERN				
			PROJECTED HOUSEHOLD				
			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%
Alameda	13	Central South Santa Clara County	73,000	90,000	18,000	+25%	1%
	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%
	19	Northwest Alameda County	73,000	115,000	42,000	+57%	3%
Contra Costa	20	West Contra Costa County	86,000	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	86,000	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	+21%	1%
REGION			2,677,000	4,043,000	1,367,000	+51%	100%