

City of Sausalito

Regional Housing Needs Allocation Appeal

Association of Bay Area Governments
Administrative Committee

October 15, 2021



A – ABAG did Not Address Opportunities and Constraints to Development of Housing in Each Member Jurisdiction

- Government Code Section 65584.04(e) identifies specific factors that each council of governments must include to develop the RHNA methodology. Paragraph (2) of subsection (e) requires ABAG to address opportunities and constraints to development of housing in each member jurisdiction, including:
 - Lack of capacity for sewer or water service
 - Availability of land suitable for urban development or for conversion to residential use, the availability of underutilized land, and opportunities for infill development and increased residential densities.
 - Lands preserved or protected from urban development
- ABAG did not identify opportunities and constraints to development **at the member jurisdiction level**
- ABAG is not restricted to the use of the Local Jurisdiction Survey – State law explicitly references use of other sources of information
- In its response to Sausalito's appeal, ABAG staff did not identify any resources where the required analysis had been conducted at the member jurisdiction level.



A – Water and Sewer Capacity

Gov. Code 65584.04(e)(2)(A)

- ABAG did not address whether there was adequate capacity for sewer or water service to accommodate the RHNA at the member jurisdiction level
- Service provider data is readily available:
 - Urban Water Management Plans, master plans, and other documented sources data of water and sewer capacity



A – Availability of Land Suitable for Urban Development or for Conversion to Residential Use

Gov. Code 65584.04(e)(2)(B)

- Data sources are readily available to ABAG to address the availability of land **suitable for urban development and conversion to residential use** for each member jurisdiction
 - ABAG is not limited to consideration of the Local Jurisdiction Survey
 - ABAG did not review readily available assessor data to identify existing uses, parcel sizes, or parcel locations to determine sites appropriate for urban development or conversion to residential use
 - To determine if a site is suitable for residential development, constraints must be addressed
 - ABAG did not consider data regarding wildfire hazards, evacuation routes, steep slopes, and geotechnical conditions, including the potential for subsidence and liquefaction, to determine suitable sites for urban development, conversion to residential use
- Despite the requirement of State law, ABAG did not perform any review of Sausalito's capacity for residential growth based on the availability of land **suitable** for urban development or conversion to residential use, including underutilized land

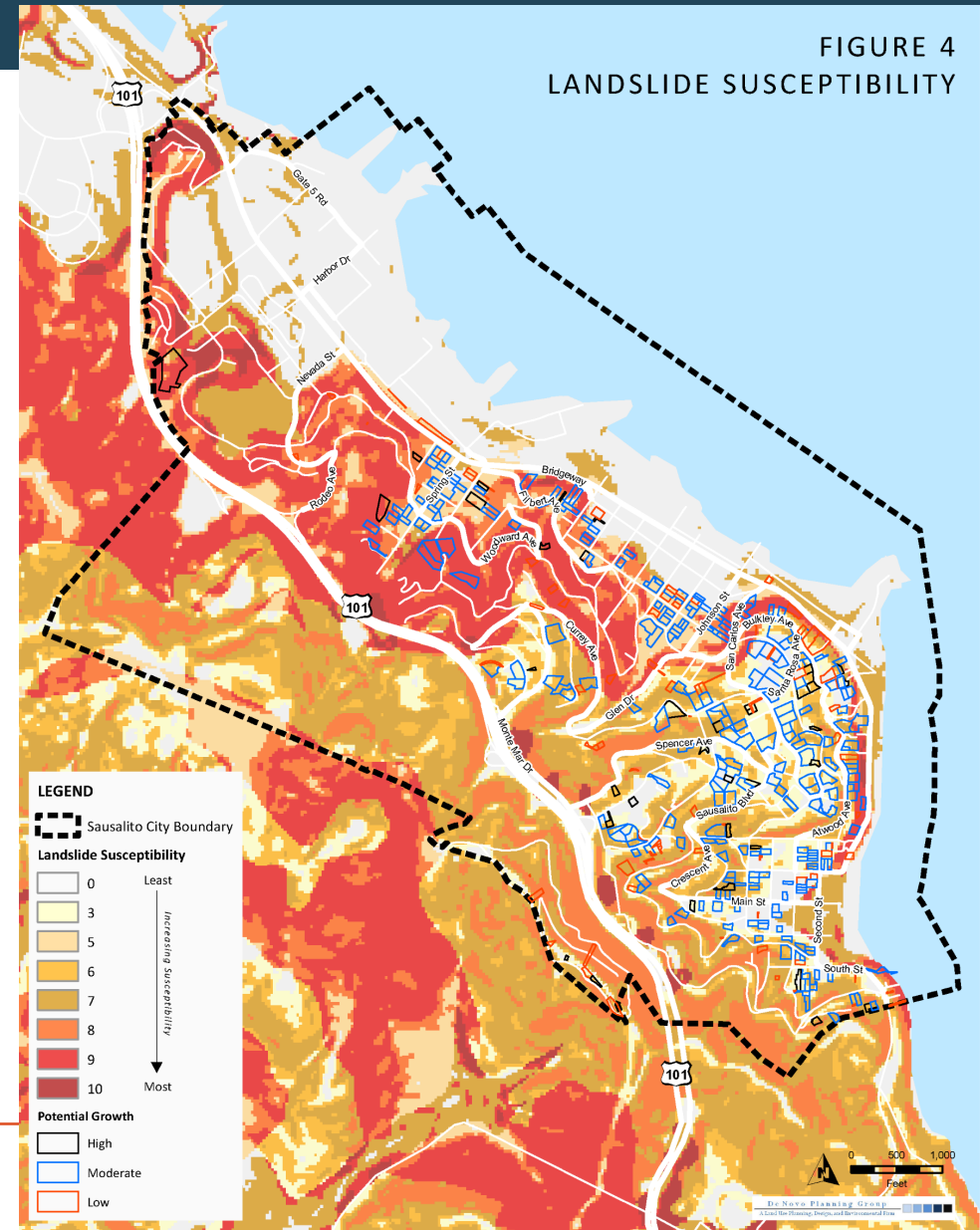


A – Suitability of Land for Urban and Residential Use

Gov. Code 65584.04(e)(2)(B)

- Much of the land in Sausalito is constrained:
 - Extremely steep slopes with **very high landslide** susceptibility (California Department of Conservation Map 58)

FIGURE 4
LANDSLIDE SUSCEPTIBILITY

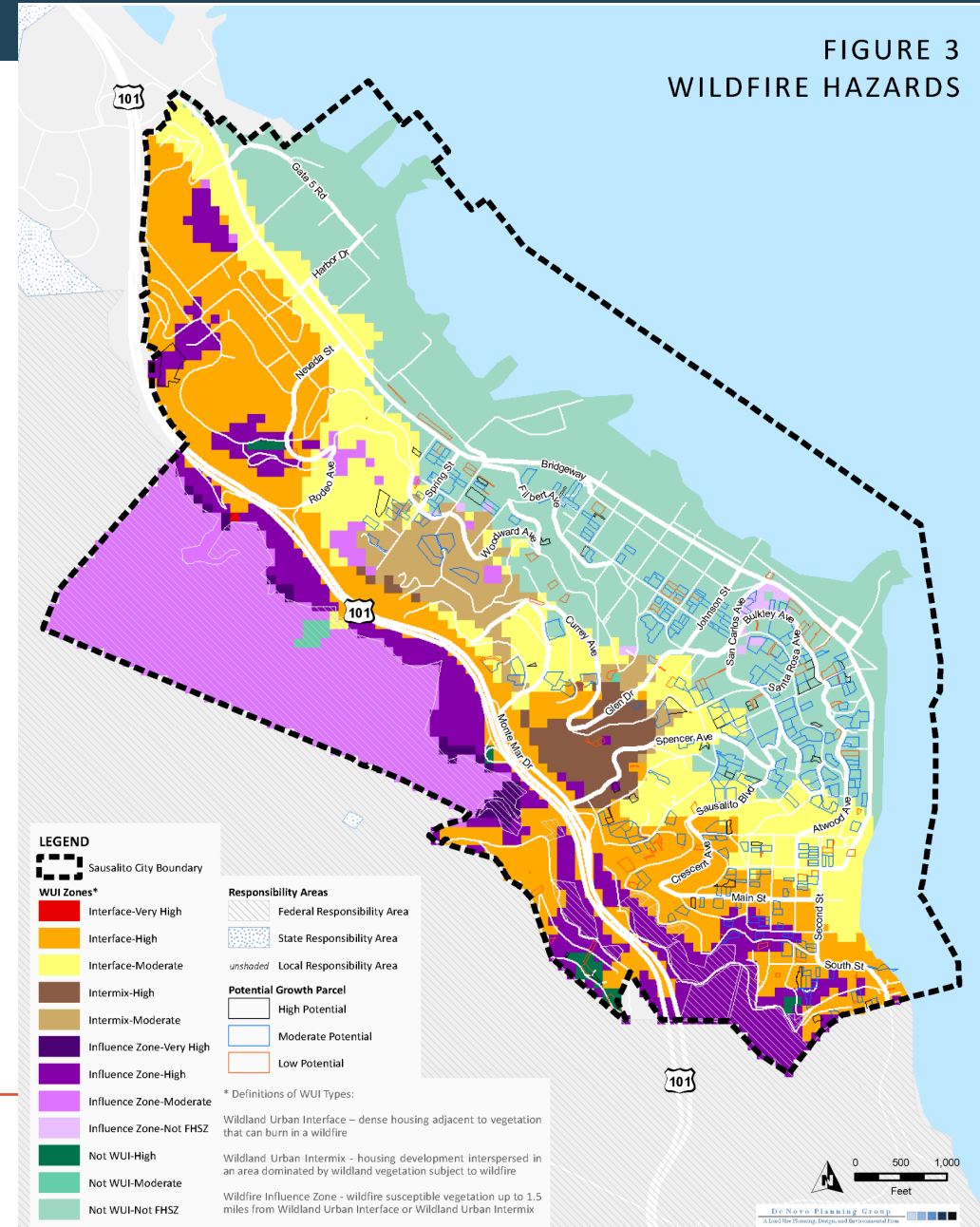


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Gov. Code 65584.04(e)(2)(B)

- Much of the land in Sausalito is constrained:
 - Extremely steep slopes with **very high landslide** susceptibility (California Department of Conservation Map 58)
 - Limited street capacity in areas with steep slopes and high wildland fire potential – many streets do not meet the recently established standards by the California Code of Regulations Title 14 for **emergency access and egress**

FIGURE 3
WILDFIRE HAZARDS

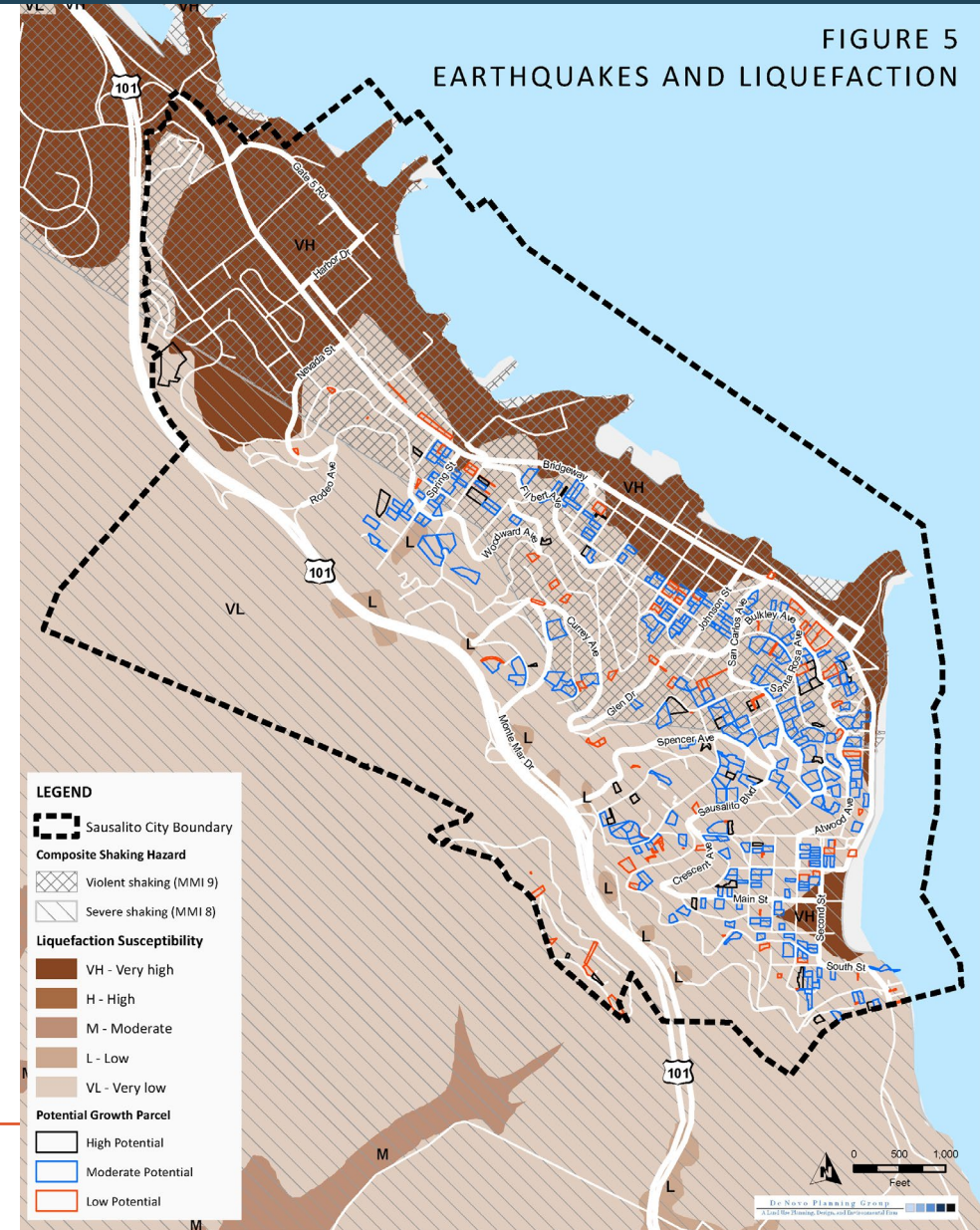


A – Suitability of Land for Urban and Residential Use

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- Much of the land in Sausalito is constrained:
 - Extremely steep slopes with **very high landslide susceptibility** (California Department of Conservation Map 58)
 - Limited street capacity in areas with steep slopes and high wildland fire potential – many streets do not meet the recently established standards by the California Code of Regulations Title 14 for **emergency access and egress**
 - Areas with **high liquefaction potential**

FIGURE 5
EARTHQUAKES AND LIQUEFACTION

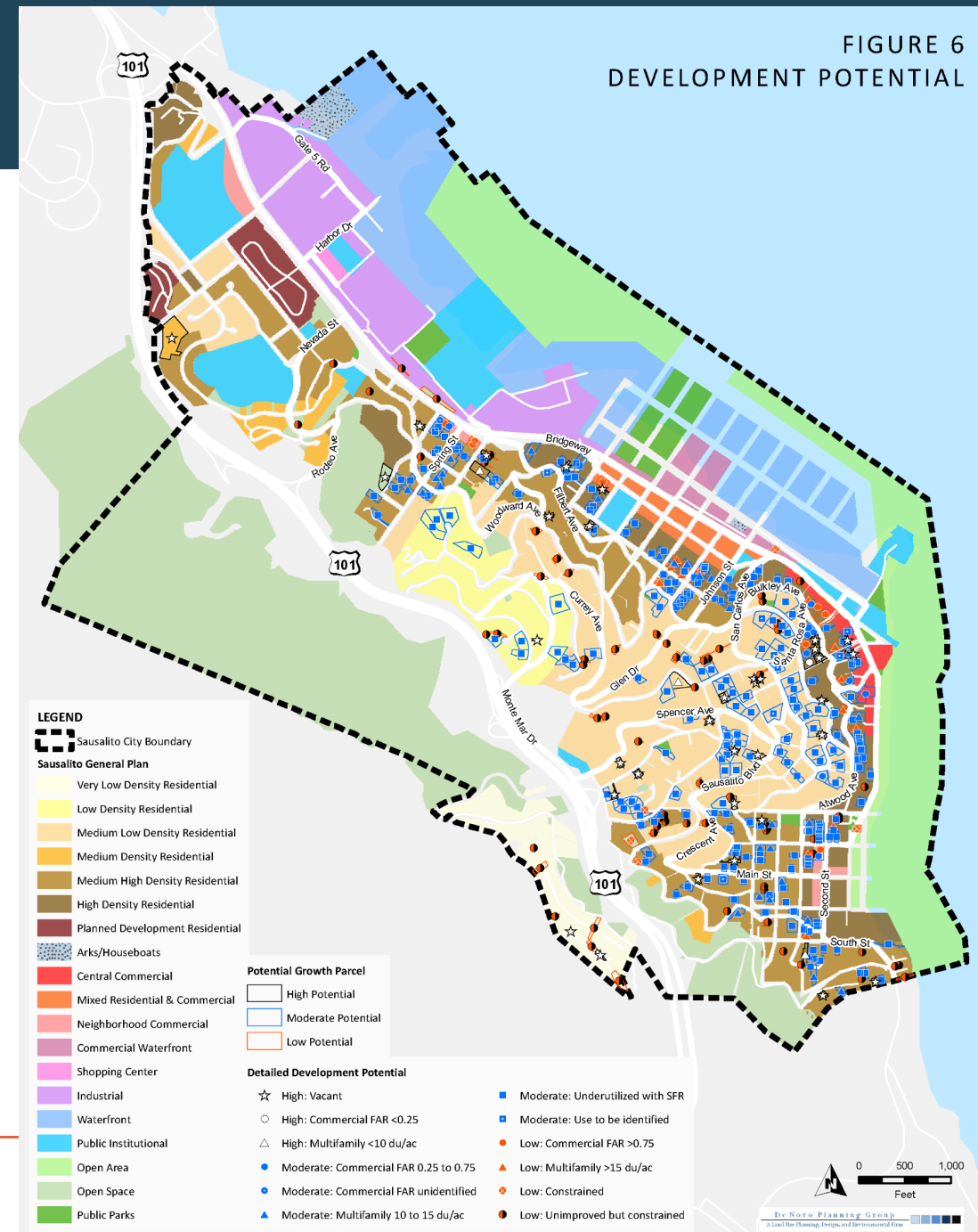


A – Suitable Land

Gov. Code 65584.04(e)(2)(B)

- Sausalito has considered the availability of land **suitable** for urban development, conversion to residential use, availability of underutilized land, opportunities for infill development, and opportunities for increased residential densities
 - Existing uses and likelihood of reuse
 - Site constraints

FIGURE 6
DEVELOPMENT POTENTIAL



A – Capacity for Residential Growth

Gov. Code 65584.04(e)(2)(B)

- 429 lots in the City with development potential:
 - Only 18 lots are larger than 0.5 acres and only 1 is vacant
 - The majority of lots are extremely small (0.10 acres or less) and developed with at least 1 residential unit
- To determine capacity, Sausalito made aggressive growth assumptions:

	Capacity with Constraints	Existing Units	Net Capacity
All vacant sites and all underutilized sites suitable for residential uses that are vacant or likely to be incentivized to redevelop during the 6 th Cycle - Includes 25% increase in density on sites appropriate for development or redevelopment at higher intensities than the City's current General Plan or zoning	204	59	145



B – Error in Plan Bay Area Factors

- Draft Plan Bay Area 2050 Growth Geographies (Map 1.1) designates a small portion of Sausalito in the Growth Geographies category – this area is subject to the highest level of earthquake-related groundshaking (MMI 9, violent shaking) mapped for the Bay Area, has areas rated at very high risk for landslides by the State, and is along the shoreline area that will be affected by sea level rise.
- Transit-Rich: A detailed review of Sausalito's bus and ferry service schedules reveals that Sausalito has limited transit service.
- The Growth Geography and Transit-Rich Areas categories have been mis-applied, which results in overallocation of growth that is inconsistent with the definitions and methodology identified in Plan Bay Area.



B – Inconsistency with Plan PBA 2050

- ABAG has applied its RHNA factors on top of the growth anticipated for each subregion.
 - This is inconsistent with State law, which requires ABAG to address the capacity of each jurisdiction for growth, as previously discussed, and not just allocate growth based on factors that do not consider the actual capacity for growth.
- The Draft RHNA Plan shows that Sausalito's share of the PBA 2050 future households is 0.125%, or 5,054 total households. Sausalito's existing 4,243 households would increase by 811 units in accordance with Plan Bay Area.
- The Draft RHNA Plan allocates 724 units – this is 89% of Sausalito's PBA 2050 growth. **It is unrealistic to assume that 89% of the growth assumed in Plan Bay Area for a 30-year period for Sausalito will occur during a short 8-year window.** The Draft RHNA Plan over-projects growth for Sausalito by more than 300%.
- PBA 2050 states *“the North Bay counties of Marin, Napa, Sonoma and Solano are expected to be home to less than 10% of new households and jobs, as relatively limited job centers and transit options coupled with wildfire risk make these counties less suited for growth. In fact, Marin County is projected to see a minor net loss in jobs as its population ages and exits the workforce.”* The Draft RHNA Plan and aggressive growth for Sausalito, and Marin County as a whole, is at odds with the growth and growth rates anticipated for these areas in PBA 2050.



CORRECTED ALLOCATION OF RHNA

Income Level	A: RHNA Based on Sausalito's Share of 2050 Growth (See Table 9)		B: RHNA Based on Sausalito's Capacity of Housing Growth during the 6 th Cycle (see Table 8)	
	Equity Adjustment Applied to Redistribute Capacity between Very Low and Low Income	Sausalito Requested RHNA (Option A)	Equity Adjustment Applied to Redistribute Capacity between Very Low and Low Income	Sausalito Requested RHNA (Option B)
Very Low	123x 63.54%	78	143 x 63.54%	91
Low	123 x 36.46%	45	143 x 36.46%	52
Moderate	-	1	-	1
Above Moderate	-	1	-	1
TOTAL	-	125	-	145

