



CITY OF PIEDMONT CALIFORNIA

October 14, 2020

Mayor Jesse Arreguín, President
ASSOCIATION OF BAY AREA GOVERNMENTS
375 Beale Street, Suite 700
San Francisco, CA 94105

VIA ELECTRONIC MAIL

Dear Mayor Arreguín:

Thank you for your continued efforts on behalf of the ABAG Housing Methodology Committee (HMC). As stated in our previous letter to the HMC (August 27, 2020), we appreciate the work that has been done on the 2023-2031 Regional Housing Needs Allocation and we are committed to significantly increase affordable housing production during the next cycle. However, we continue to have concerns about the model's assumptions and the resulting draft assignment for our community.

We concur with the findings expressed by the Contra Costa County Mayors Conference in their letter to you dated October 2, 2020. As we stated in our August 27, 2020 letter, and as 18 cities in our neighboring county have confirmed, the current allocation disproportionately shifts the regional housing need to small communities that have little or no transit infrastructure, high wildfire hazards, and small employment bases. As such, the proposed RHNA methodology and resulting distribution appear incompatible with Plan Bay Area 2050, as well as State and regional climate action goals.

We also remain concerned about erroneous model assumptions for our community, and outcomes that are not rational or consistent with prior regional forecasts. As Attachment A to this email illustrates, the version of the Plan Bay Area 2050 Blueprint forecasts recently shared with cities assumes no change in the number of households in Piedmont between 2015 and 2050. Yet, the preliminary Blueprint 2050 jurisdiction-level projection used by the Housing Methodology Committee is 440 housing units. The Blueprint 2050 jurisdictional forecasts are the baseline and a key component of the RHNA methodology. According to ABAG-MTC staff, the methodology used to develop these Blueprint 2050 jurisdictional forecasts is forthcoming but we have not received it.

Moreover, the Plan Bay Area 2050 Blueprint forecasts, used as inputs to the RHNA, appear to anticipate a doubling of employment in Piedmont (from 1,000 to 2,000 jobs). As we have stated in prior letters to ABAG, dating back almost 20 years, Piedmont has just 3.7 acres of land zoned for employment-generating land uses and is completely landlocked. Our General Plan anticipates an employment increase of only 50 jobs over a 30-year period, based on prior ABAG forecasts and the very limited number of employers in the community. In fact, Plan Bay Area 2040 projected that Piedmont would lose jobs between 2020 and 2040.

We have requested additional information from ABAG to help us better understand and validate the model inputs, including a change in the allocation of Plan Bay Area 2050 Blueprint growth forecasts that leaves Piedmont with a projected increase of 440 households as the "baseline" on which its RHNA is calculated. This increase has not been explained and obtaining information about its origin and intent has been challenging.

The proposed 600-unit RHNA allocation, using the Blueprint's baseline of 440 units, is a 900 percent increase over our allocation for the 2015-2023 planning period. While Piedmont is committed to increasing its supply of housing and expanding the variety and affordability of homes in our community, this increase does not appear to reflect physical conditions of our community or market realities.

As noted in our prior letter, Piedmont is 1.7 square miles. Its vacant land supply consists of 60 sloped or very steep lots accessed by narrow streets, some of which are difficult to access by emergency vehicles. The entire city is a Wildland-Urban Interface area, and 20 percent of the City is classified as a Very High Fire Hazard area. Most of Piedmont's road network was developed prior to 1930. Over 100 streets are too narrow or lack a second means of access to accommodate additional housing, pursuant to the Fire Code, and more than half of Piedmont roads are too steep to meet Fire Code standards for emergency response.

Despite the physical constraints limiting development in Piedmont, the City's aggressive and award-winning accessory dwelling unit (ADU) program has helped Piedmont achieve its RHNA in past cycles. As a designated "high-resource area," we stand ready to significantly increase affordable housing production during the next cycle. Please consider an allocation that is feasible and reasonable for small jurisdictions. No other city in the East Bay is proposed for an increase of 900 percent over prior RHNA assignments. In fact, the proposed increase in Piedmont's RHNA is four times the regional average.

In closing, we support the recommendations of the Contra Costa County Mayors Conference, including their equitable distribution of housing among the counties of the region and their alternate methodology, which is more transparent and verifiable. We also request that ABAG provide additional data to local jurisdictions on the modeling assumptions, so that we may better understand the outcomes and respond accordingly. We believe that additional adjustments to the allocation method are needed to achieve a RHNA that is equitable, yet also responsive to land use patterns, economics, and efforts to address climate change and natural hazards in our region.

Sincerely,

CITY OF PIEDMONT



Sara Lillevand
City Administrator

cc: City Council

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