



TOWN OF COLMA

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November 12, 2020

Ms. Karen Mitchoff, Chair
ABAG Regional Planning Committee
c/o ABAG-MTC Public Information Office
375 Beale St, Suite 800
San Francisco, CA 94105

VIA EMAIL

RE: Town of Colma RHNA Methodology Allocation

Dear Chair Mitchoff:

The Town of Colma would like to comment on the proposed methodology for the RHNA 6 cycle and the draft subregion shares passed by the Executive Board at their meeting on October 15, 2020. The Town respectfully requests that the Town's RHNA allocation be substantially adjusted downward based on the information provided in this letter. We believe that the Methodology Committee drastically erred in its allocation for Colma by not properly considering RHNA Methodology Factor 2, Constraints to Development. In addition, while Colma is considered a transit-rich location, development opportunities are limited due to the encumbrance of 73% of the Town's land area for cemetery use and essentially no vacant land.

If proposed methodology scenario 8a is adopted, the Town will receive an allocation of 183 units. This represents a three-fold increase from the Town's allocation of 59 units from the RHNA 5 allocation and represents an unattainable and unrealistic 36% increase in the Town's total housing stock which developed over more than a 70-year period. The Town was able to satisfy its RHNA 5 housing goal by the development of the Town's only substantial designated housing site with a 66-unit affordable housing project for Veterans. The Town supports the development of housing where feasible.

Constraints to Development

The Town of Colma is less than 2 square miles with a resident population of approximately 1,500 people. The Town was incorporated in 1924 to protect cemeteries from the forced

John Irish Goodwin, Mayor
Diana Colvin, Vice Mayor

Helen Fisicaro, Council Member • Raquel P. Gonzalez, Council Member • Joanne F. del Rosario, Council Member
Brian Dossey, City Manager

relocations that occurred in San Francisco. Approximately 73% of the Town's land area is in cemetery use or planned cemetery use and cannot legally be used for any other purpose. The Town believes that the Methodology Committee should have applied a substantial offset to housing production based on the objective reality of Colma's unique land use constraints.

RHNA Methodology Factor 2, Constraints to Development, item C, excludes lands preserved or protected from urban development under existing state or federal programs. While the primary focus of this factor is protection of agricultural lands and sensitive habitats, it also applies to cemeteries regulated by the California Cemetery and Funeral Bureau. Cemetery lands should be fully excluded from all modeling and land use scenarios.

Inability to Meet State Housing Element Requirements

The Town of Colma is pleased to have certified all previous Housing Elements with the State and has worked faithfully to meet its housing goals. The Town is concerned that the state may not accept the designation of potential housing sites in Colma which are not "vacant" and which may not develop within the 8 year time frame under the new site designation criteria. If the Town is unable to designate housing sites, the Town will not be able to request certification of our Housing Element. We have only two sites which we believe can accommodate approximately 60 units and meet the site selection criteria for the current RHNA cycle. While the Town is planning for and anticipates development of mixed-use housing on a couple of existing commercial sites in the long-term, the designation of these sites is premature since they are still occupied and have viable commercial uses.

For the reasons outlined above, the Town respectfully asks that you reconsider the allocation methodology and reduce the housing allocation for Colma. Thank you for your consideration, and this opportunity to provide comment.

Sincerely,



John Irish Goodwin, Mayor

Cc: Jesse Arreguin, President, ABAG Executive Board
San Mateo County Supervisor David Canepa
Town of Colma City Council
Christopher Diaz, Esq., City Attorney