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November 13, 2020

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Mayor Jesse Arreguín, President  
Association of Bay Area Governments (ABAG) Board  
375 Beale Street, Suite 700  
San Francisco, CA 94105-2066  
Via email to [RHNA@bayareametro.gov](mailto:RHNA@bayareametro.gov)

Re: Proposed RHNA Methodology and Subregional Shares

Dear President Arreguín,

On behalf of the Marin County Board of Supervisors, thank you and the Housing Methodology Committee for the difficult work to ensure the Regional Housing Need Allocation is distributed in an equitable way that both seeks to provide opportunity to those in need of housing and ensures that our shared goals to put housing near services and jobs to address climate change are addressed.

We are committed to addressing housing as an issue of equity; where one lives matters a great deal to health and well-being. We recognize the role that housing policies, laws, and regulations can play in promoting neighborhood conditions that positively shape health and well-being. We are committed to providing affordable housing that provides residents the same chance to live in a safe neighborhood with great schools, healthy food options, public libraries, community centers, parks and trails, transportation hubs, and access to employment centers.

However, we are concerned that the proposed methodology adopted by the Housing Methodology Committee (HMC) and assumptions in the Blueprint 2050 will result in a significant increase in the Regional Housing Need Allocation (RHNA) in the unincorporated County that may make it impossible for us to meet these housing goals.

Marin County has a history of receiving State certification of its housing elements going back to 1970 and we wish to continue this practice. The County has adopted strong housing policy and taken a leadership role with coordinating with our cities and towns on housing. Some of our recent successes include:

- *Staffing the Housing Working Group* – In 2018, staff convened a countywide working group of planners to encourage interjurisdictional collaboration on housing issues and solutions, with a specific focus on responding to 2017 State housing Package. The working group established common goals and continues to coordinate on housing legislation, planning, production, and preservation of existing affordability.

- *SB 2 Grants* – The Housing Working Group jointly filed applications for three projects, including the Objective Design and Development Standards and ADU Workbook and Website in order to collaborate on a common strategy and save on costs and time for each participating jurisdiction.
- *Objective Design Standards* – Marin County jurisdictions hired a consultant to produce a general toolkit that will utilize existing zoning codes as a basis to produce objective standards and guidelines. This toolkit will be customized for each jurisdiction through chapters that outline architectural standards, building patterns, and historical significance.
- *ADU Workbook and Website* – The work includes updating the County website with code compliant floor plans, a calculator that estimates construction costs, homeowner spotlights, and a workbook.
- *Housing Trust Balance* – The Board has deposited over \$10 million in a local fund to be used for fund affordable housing.
- *Acquisition of the former Coast Guard Housing Facility* – after federal legislation required the land be sold to the County and years of negotiations with the Coast Guard, the County purchased the property to be developed as affordable housing.
- *Policies to prevent displacement of our existing lower income renters* – The Board of Supervisors has allocated resources and adopted policies, such as tenant protections and purchasing properties, to prevent displacement.

We understand that our share of the RHNA will increase and we are committed to increasing our housing production, especially of homes affordable to lower income households. However, the proposed methodology and assumptions could result in the unincorporated County receiving over 20 times more than the housing allocated to us in the previous cycle. With an increase of this magnitude, the County may not be able to adopt a compliant housing element unless we put housing in environmentally sensitive areas, prone to fires, flooding, and sea level rise.

Nearly half of the county's land base is protected by park or open space status. With the largest amount of public land in the nine-county Bay Area, Marin County's 118,669 acres of park and open space make up 30 percent of the County's land base, while water area and watershed lands comprise another 20 percent. Approximately 15% remains undeveloped.

- *Infrastructure* – Similar to other unincorporated counties, we lack the infrastructure to support densities of this level, especially because the increase is so magnified on such a short timeline. The goals, policies, and programs contained in the County's General Plan (Countywide Plan or CWP) direct future growth towards the City-Centered Corridor and the existing urban service areas of unincorporated communities to ensure that biotic, agricultural, open space, and other resources would be protected. Policies and programs ensure new development would be confined to areas where adequate public services are available and

coordinate the provision, timing, and funding of public services such that new growth would be appropriate to the specific area and constrained by available services such as water supply and wastewater treatment. Analysis of the Countywide Plan has demonstrated that although development is possible in the City-Centered Corridor, the development of units as required by the proposed RHNA numbers is not realistic in this area due to limited infrastructure and policies in the Countywide Plan to address sensitive habitat, high risk of wildfire, flooding, and sea level rise.

- *Wildfire Hazards* – In light of recent fire events, it is important to address fire hazards. Many unincorporated communities are considered “Communities at Risk” by the National Fire Plan because of the proximity of housing to areas susceptible to wildland fires. The California Department of forestry rates portions of Marin County either as a high, very high, or extreme fire hazard. Many of the high-risk areas are interspersed with developed areas. In addition, many of the roads to access these areas are private, narrow and substandard. New land uses and development could expose people and structures to wildland fires throughout the county, especially in areas with steep slopes, high fuel loads (i.e., dense vegetation) or inadequate emergency access.
- *Flooding and Sea Level Rise* – To address risks of flooding, the CWP requires all improvements in Bayfront, Floodplain, Tidelands, and Coastal High Hazard Zones to be designed to be more resistant to damage from flooding, tsunamis, seiches, and related water-borne debris, and to be located so that buildings and features such as docks, decking, floats, and vessels would be more resistant to damage. While the CWP does not prohibit development impacted by flooding, these are real limitations which will continue to increase as we face climate change. Calculations estimate sea level rises ranging anywhere from approximately 1-3 feet or 8.5-35.2 inches by the end of the Century, further limiting our development opportunities.

One of ABAG’s core strategies is “focused growth in communities along existing transportation networks near homes and jobs... This strategy aims to minimize development in our green fields and maximize growth in transit-rich communities, which will help lower vehicle miles traveled and greenhouse gases.” The proposed RHNA numbers in unincorporated Marin County contradict those policies as the County would be forced to develop in green fields and areas outside of transit networks, existing residential development, and job centers.<sup>1</sup>

We would like to reiterate that we understand that RHNA is increasing and the County will be expected to do more than in the past. However, we respectfully request that you consider a methodology that will not focus growth in unincorporated areas with few services and more environmentally sensitive areas. Unincorporated areas have fewer services, infrastructure and jobs. To better reflect the realities of the constraints of unincorporated communities, we

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<sup>1</sup> <https://abag.ca.gov/our-work/land-use/pda-priority-development-areas>

would like to endorse recommendations, such as from the Contra Costa Mayors Conference, that the **Plan Bay Area 2050 Growth** baseline be utilized, leaving the HMC-recommended factors in place.

Thank you for the opportunity to comment.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Katie Rice".

Katie Rice, President  
Marin County Board of Supervisors

Cc: Marin County Board of Supervisors