



Alice Fredericks
Mayor

.....

Holli Thier
Vice Mayor

.....

David Kulik
Councilmember

.....

Jack Ryan
Councilmember

.....

Jon Welner
Councilmember

Greg Chanis
Town Manager

Mayor Jesse Arreguín, President
Association of Bay Area Governments (ABAG) Executive Board
375 Beale Street, Suite 700
San Francisco, CA 94105-2066

Re: Request for Use of Plan Bay Area 2050 Household Growth as Baseline
for RHNA Methodology

Dear Board President Arreguín:

The Town of Tiburon respectfully requests the ABAG Executive Board to modify the RHNA methodology baseline to conform to the *Plan Bay Area 2050 Blueprint Household Growth*. The requested modification furthers the intent of statutorily mandated objectives and brings the proposed RHNA into conformity with Plan Bay Area 2050.

The methodology recommended by the Housing Methodology Committee (HMC) allocates too many units to suburban areas that are far from job centers, lack adequate transportation infrastructure, and are in areas of wildfire risk. The proposed HMC methodology will not further greenhouse gas reduction goals and is inconsistent with the growth patterns and policy objectives more carefully considered in the *Plan Bay Area 2050 Blueprint*.

Small jurisdictions are being set up for failure under the proposed methodology. The RHNA proposed for the Town of Tiburon is 8 times higher than the Town’s current RHNA. The proposed RHNA amounts to more units than it has been allocated over the last four RHNA cycles combined. While the Town of Tiburon continues to make progress in achieving 100% of our current RHNA allocations, we have not accomplished this yet. Despite efforts to develop and adopt a compliant housing element and streamline our processing of development projects, the units have not been built by the private market. The Town believes that this is due in part to our location in the Bay Area relative to where jobs and job growth are and to limited public transportation making the required travel to jobs a challenge both logistically and in relation to goals of greenhouse gas reduction. The proposed RHNA, eight times the Town’s previous allocation, carries the potential of significant penalties to our community because the production numbers are simply unrealistic.



Alice Fredericks
Mayor



Holli Thier
Vice Mayor



David Kulik
Councilmember



Jack Ryan
Councilmember



Jon Welner
Councilmember

Greg Chanis
Town Manager

In place of the HMC proposal, we recommend the Executive Board follow ABAG staff’s July 2020 suggestion to use the *Draft Blueprint* for the RHNA methodology. The RHNA generated by Draft Blueprint uses each jurisdiction’s share of *Household Growth* from 2010 to 2050 as the baseline. The Town supports the *Household Growth* baseline. While we prefer the methodology that includes job growth, the Household Growth baseline results in higher allocations for jurisdictions with significant jobs that are experiencing growth, including communities that have elected to be Priority Development Areas. This approach is consistent with long-range forecasts that have been used in ABAG’s methodologies for previous RHNA cycles. (July 9, 2020, HMC Meeting #8, Item 6a, Attachment A, Page 3).

In addition, the State Housing and Community Development Department (HCD) has already approved using regional plan household growth as a baseline for 4 of the 8 approved 6th Cycle RHNA methodologies (with 3 others using baselines that factor in jobs, and one using a variety of factors). The advantages of this baseline are summarized by ABAG staff (July 9, 2020, HMC Meeting #8, Item 6a, Attachment A, Page 3):

- Simple and straightforward to implement and discuss (e.g., “the methodology aligns with growth predicted by Plan Bay Area 2050”)
- Integrates transit, hazards, and market feasibility through strategies and modeling
- Better aligned with Plan Bay Area 2050
- Emphasis on current and future employment development patterns leads to RHNA allocations more focused in Silicon Valley, region’s largest job center
- Higher RHNA allocations in high resource areas near major job centers – notably in the South Bay

The baseline proposed by HMC, in combination with additional factors and weights for allocating units by income category, result in allocations inconsistent with the Plan Bay Area Blueprint. For example, Tiburon is forecasted to grow very incrementally. In fact, by 2040, the number of households will reach 3900. This is a reduction from 2010 by ten units. Household population is projected to increase by less than 300 persons. The Town is assigned 620 housing units for the first eight years of the Plan period. Based on Tiburon’s historic growth of approximately 10 units per year, the number assigned is unrealistic

On a larger scale, the Household baseline fails to proportionally assign units to urban jurisdictions that are experiencing growth in both jobs and housing, and where housing should be supported and built. For example, the proposed methodology allocates San Jose fewer units than San Francisco, even though Plan Bay Area forecasts



Alice Fredericks
Mayor



Holli Thier
Vice Mayor



David Kulik
Councilmember



Jack Ryan
Councilmember



Jon Welner
Councilmember

that San Jose will create a half million jobs and San Francisco 182,000 jobs by 2050. In contrast, using the *Household Growth* baseline, San Jose receives more units than San Francisco in an amount that is equal to 1/3 of San Jose’s forecasted household growth in 30 years.

Furthermore, Plan Bay Area shows Marin providing approximately 2% of the region’s housing needs by 2050 and losing about 13,000 jobs. With the largest number of retirees, Marin is actually reducing jobs as employment and housing moves to areas with significant growth primarily in working age households. This data further supports the Town’s position that use of either Plan Bay Area methodology or blueprint of Household Growth as a baseline provides a more accurate forecast of housing needs.

Finally, the Town requests that ABAG add Wildland-Urban Interface Fire Threat areas and FEMA floodways for the San Francisco Bay Region to the *2050 Plan Bay Area Blueprint*. Both Fire Threat areas and Floodways are available in the Metropolitan Transportation Commission Map Gallery. Currently, only CAL FIRE Very High Severity zones are factored into the Plan. The zones do not adequately represent wildfire and sea level risk in Tiburon.

Thank you for your consideration of our concerns as we all plan to meet housing needs for our communities that are realistic and consistent with the statutory mandates for the region.

Respectfully

Alice Fredericks
Mayor, Town of Tiburon

Greg Chanis
Town Manager