

From:

[Fred Castro](#)

Subject:

Item 6a on Nov. 12, ABAG Regional Planning Committee Agenda Public Hearing on RHNA Proposed Methodology

Date:

Wednesday, November 11, 2020 3:39:04 PM

External Email

Dear Regional Planning Committee Chairperson Mitchoff and Committee Members:

The purpose of this letter is to express my concern with the ABAG Executive Board's tentative adoption of a methodology that does not include natural hazards in the allocation formula. On page 5 of the Oct. 15 report of the Executive Director he comments on the decision to omit this factor from the methodology with the parting sentence, "Local governments will have the opportunity to consider the most appropriate places for planning for housing in lower-risk areas when they update the Housing Elements of their General Plans." That may be true of most cities in the Bay area, but it is certainly not true of my City, Alameda.

The ABAG Natural Hazard map at

https://abag.ca.gov/sites/default/files/factor_o1_natural_hazards_v2.pdf indicates that Alameda is among those cities with the lowest percentage of urbanized area outside of a hazard zone (less than 50%). It is obvious that the primary hazard that causes this is sea level rise. See

<https://www.nbcbayarea.com/investigations/unlike-any-disaster-we-have-ever-seen-says-state-agency-about-rising-seas-in-bay-area/2236314/> which indicates the current projections for year 2100 are 66 inches with a storm surge level of 84 inches. A review of flood visualization maps shows that the portion of Alameda that is outside of a hazard zone is the center of the island which is already a very densely built up area. Therefore Alameda has ***no choice*** but to build new housing directly in the flood hazard zone. In fact, the 4000 plus new units that have been approved in the present cycle are primarily in the flood hazard zone.

Add to all of the above the fact that Alameda is an island with very limited ingress /egress over antiquated tubes and bridges and the fact that most of our police and fire first responders live off the island.

None of the above is intended to argue that Alameda should not have a significant RHNA. We are a high resource City that fits very well into the equity factor. However, a fair allocation demands that our negative natural hazards factor should be an element of the final allocation.

To fail to do so endangers not only present residents but also those who will be occupying the new housing.

Sincerely,

Paul S Foreman