



CITY OF SAUSALITO

420 Litho Street • Sausalito, CA 94965
Telephone: (415) 289-4100
www.sausalito.gov

November 18, 2020

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 Plan Bay Area 2050 Household Growth as Baseline for RHNA Methodology

Dear Board President Arreguín:

Thank you 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. The City of Sausalito is committed to providing housing opportunities to all segments of the community and to taking on its fair share of housing units that are needed State wide. We are committed to providing affordable and workforce 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 under consideration by ABAG and assumptions in the Blueprint 2050 will result in a significant increase in the Regional Housing Need Allocation (RHNA) in the City of Sausalito (over 800% higher than our current RHNA) that may make it impossible for us to meet these housing goals. The City is submitting the following comments on the proposed Regional Housing Needs Allocation (RHNA) methodology under consideration by ABAG. The City of Sausalito respectfully requests ABAG modify the RHNA methodology baseline to the *Plan Bay Area 2050 Blueprint **Household Growth***. A revision to the baseline proposed by Housing Methodology Committee (HMC) is necessary to further the intent of statutorily mandated objectives and for the RHNA to be consistent with Plan Bay Area 2050.

Sausalito has made great strides over the last two housing element cycles to develop and promote innovative housing solutions to meet our fair share. We have also received a certification of our Housing Element from the State Department of Housing and Community Development (HCD) since 2012 and we wish to continue with this success. Some of our recent successes include:

- **Safe Harbor Pilot Program.** The one of its kind Sausalito Safe Harbor Program, which began in 2019, houses and provides services to members of the anchor-out community who were originally in Richardson Bay. Each participant in this program is assigned a case manager through a partnership with the Ritter Center's Whole

Person Care program for ongoing social services through wrap around case management and supports annual ongoing lease payments to marina operators for slips. The goal of the program is to make the vessels sea-worthy, safe and stable enough to be housed in a marina.

- Objective Design and Development Standards. The City has partnered with the County and other Marin jurisdictions to develop a “toolkit” to develop objective design and development standards which address several amendments to housing legislation, including the Housing Accountability Acts (AB 678, SB167, and AB1515) and SB35.
- Inclusionary Housing. In 2019 the City of Sausalito adopted our first inclusionary housing ordinance to mandate that all projects four units and greater provide a minimum of 15% affordability. In addition, the City has partnered with the County and other Marin jurisdictions to develop a residential in-lieu fee and explore a commercial linkage fee, in order to seed an Affordable Housing Trust Fund.
- Accessory Dwelling Unit Website. The City has partnered with the County and other Marin jurisdictions to develop a shared ADU website that will create a homeowner tool that gives access to floor plans, process videos, regulation summaries, and a calculator with cost estimates in order to encourage homeowners in developing ADUs, increase the accessibility of useful materials and the level of information available to the public.
- Exploring Housing Sites and Funding for Inadequately Housed Populations. Discussions in the spring of 2020 were held with Senator McGuire and the City of Sausalito in anticipation of potential financial support from the State of California in the form of competitive housing grants available as early as 2021 to meet the longstanding needs of inadequately housed populations such as the anchor-out community, seniors and the workforce. During those discussions, eight sites were preliminarily identified as candidates that could potentially be explored to provide permanent supportive housing for the anchor-out community in addition to senior housing and/or workforce housing.

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 methodology recommended by the HMC allocates too many units areas, such as Sausalito, that are in areas of wildfire risk, and to suburban areas far from job centers. The proposed 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*.

We recommend that ABAG follow ABAG staff’s July 2020 suggestion to use the *Draft Blueprint* in the RHNA methodology by using each jurisdiction’s share of **Household Growth** from 2010 to 2050 as the baseline. While the City would prefer a baseline that includes jobs, we support the **Household Growth** baseline as it results in allocations that reflect jurisdictions with significant jobs that are experiencing growth, including communities that have elected to be Priority Development Areas. “This approach is consistent with how long-range forecasts 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 proposed Plan Bay Area 2050 Household baseline, in combination with the additional factors and weights for allocating units by income category, result in allocations inconsistent with the Plan Bay Area Blueprint. For example, the City is forecasted to grow by 1,000 households during the 30 year Plan Bay Area 2050 but is assigned 740 housing units for the first eight years of the Plan period alone. Upgrades to existing infrastructure (streets, sewers, storm drains, etc.) to accommodate the increased intensity of use would be required, and the City is concerned that eight years is not enough time to make these required infrastructure upgrades for 740 units.

On a larger scale, the Household baseline fails to proportionally assign units to larger jurisdictions that are experiencing growth in both jobs and housing, and where housing will actually be built. For example, San Jose is allocated fewer units than San Francisco even though Plan Bay Area forecasts that San Jose will create a half million jobs and San Francisco 182,000 jobs by 2050. However, using a baseline of *Household Growth* increases the units for San Jose above San Francisco in an amount that is equal to 1/3 of its forecasted household growth in 30 years.

Small jurisdictions are being set up for failure under the proposed methodology. Sausalito’s proposed RHNA is over 800% higher than our current RHNA. This proposed RHNA of 740 for the next eight years is more (by almost 100 units) than the total number of units we have been allocated over the last four cycles (34 years of RHNA allocations). See the table below:

RHNA Cycle	Units Allocated to Sausalito
2 nd : 1988-1995	294
3 rd : 1999-2006	104
4 th : 2007-2014	165
5 th : 2015-2022	79
Total, RHNA Cycles 2nd-5th (34 years)	642


Finally, the City requests that ABAG add to the 2050 Plan Bay Area Blueprint Wildland-Urban Interface Fire Threat areas for the San Francisco Bay Region, which is available in the Metropolitan Transportation Commission Map Gallery. Currently, only CAL FIRE Very High

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Severity zones are factored in the Plan, which do not adequately represent wildfire risk in the Bay Area.

Thank you for your time and consideration.

Sincerely,

DocuSigned by:

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Susan Cleveland-Knowles
Mayor

cc: County of Marin Supervisors
City of Sausalito Councilmembers
Pat Eklund, Mayor Pro Tem, City of Novato