



November 17, 2020

Mayor Jesse Arreguín, President
Association of Bay Area Governments, Executive Board
375 Beale Street, Suite 800
San Francisco, CA 94105-2066
Email: RHNA@bayareametro.gov

RE: Proposed RHNA Methodology

Dear Board President Arreguín,

The City of Dublin (City) wishes to express concerns regarding the proposed Regional Housing Needs Allocation (RHNA) methodology that the Association of Bay Area Governments (ABAG) Executive Board is scheduled to take final action on at its January 21, 2021 meeting.

The City appreciates the urgency of the statewide housing crisis and the responsibility of local jurisdictions to facilitate housing construction to help alleviate this crisis. Dublin was the fastest growing city in California between 2010 and 2019 due to significant steps taken to facilitate the construction of both market-rate and affordable housing. During the current RHNA cycle, the City issued building permits for the construction of 4,138 dwelling units compared to our allocation of 2,285 units. Specifically, as of September 30, 2020, the City had issued permits for 3,993 above-moderate income, 80 moderate income, 39 low-income, and 26 very low-income units.

In the near future, the City anticipates construction of additional new affordable housing utilizing the City's Affordable Housing Fund and Alameda County Measure A-1 Bond funding. In July 2020, the City issued a Notice of Funding Availability for approximately \$10 million in funding to support predevelopment, acquisition, and construction of affordable rental housing and is currently reviewing proposals.

The 6th Cycle RHNA process presents significant challenges and the City appreciates the efforts and dedication of the Housing Methodology Committee. However, the City urges the Executive Board to reject their proposed methodology and consider alternative factors and weights, in order to more appropriately balance the RHNA statutory requirements including equity and fair housing goals, as well as those related to efficient growth patterns and greenhouse gas emissions.

The City is concerned with the disproportionate emphasis on factors that allocate RHNA to high opportunity areas, without consideration of the negative consequences of the resultant land use patterns. The following points reflect our specific concerns with the proposed methodology:

- Does not adequately address factors related to jobs proximity and locates housing a considerable distance from the Bay Area's major employment centers of the South Bay, Oakland, and San Francisco.

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Human Resources
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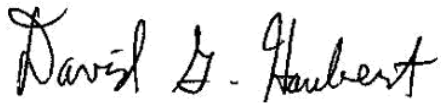
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- Allocates growth in a manner that promotes auto dependency, prolongs longer commutes, and exacerbates associated GHG emissions. In addition to the environmental factors, it impacts time away from families and economic strain on household finances, particularly for lower-income households.
- Pushes significant housing allocations to the outer ring of Bay Area suburbs, exasperating the jobs/housing imbalance.
- Fails to consider progress made during current RHNA cycle, as outlined above.

Given these concerns, the City urges the Executive Board to reject the proposed methodology recommended by the Housing Methodology Committee and refine the methodology to consider factors and weights that focus housing in areas most proximate to highest concentration of jobs as well as recent housing production efforts.

Should you have any questions, please do not hesitate to contact Michael Cass, Principal Planner, at (925) 833-6610 or Michael.Cass@dublin.ca.gov.

Sincerely,

A handwritten signature in black ink that reads "David G. Haubert". The signature is written in a cursive, slightly slanted style.

David Haubert, Mayor
City of Dublin

cc. Linda Smith, City Manager
Jeff Baker, Community Development Director
Kristie Wheeler, Assistant Community Development Director
Michael P. Cass, Principal Planner