



TOWN OF ATHERTON

CITY COUNCIL
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November 20, 2020

Ms. Karen Mitchoff, Chair
ABAG Regional Planning Committee
c/o ABAG-MTC Public Information Office
375 Beale St, Suite 800
San Francisco, CA 94105

VIA EMAIL

RE: Proposed RHNA Methodology and Subregional Shares

Dear Chair Mitchoff:

I write on behalf of the Town of Atherton to provide comment on the proposed methodology for the RHNA 6 cycle and the draft subregion shares passed by the Executive Board at their meeting on October 15, 2020.

The Town of Atherton is a small, residential community with public and private schools. Aside from local school operations, the Town's primary land use is residential, and the Town does not allow commercial development. As a result, there are very few jobs outside of the limited number of Town employees and employees of local schools. It is also important to note that Caltrain no longer serves this community and transportation options are very limited.

The RHNA methodology relies heavily on proximity to jobs as a factor. Neighboring jurisdictions regularly approve large scale commercial developments that result in job growth, demands on local resources, and a demand for new housing in those communities. Those communities in turn, also benefit from the resulting tax bases and should be required to provide their fair share of housing and resource amenities to meet a healthy job-to-housing ratio. As the Town does not anticipate growth, let alone job growth within the Town limits, this methodology is not applicable to the Town of Atherton.

As noted above, the Town's long-standing character is as a residential community. With the last Housing Element process, the Town revised its Accessory Dwelling Unit (ADU) ordinance to exempt ADUs from floor area. This resulted in substantial new construction of ADUs in a manner that remains consistent with the Town's character. In 2020 Town updated its ADU ordinance for compliance with State regulations and will continue to promote new ADU construction as a means of balancing new housing options. In addition, the

Town has committed to working with the local schools to promote new housing on their facilities. The Town is supportive of a reasonable RHNA allocation that can be achieved within its community character.

Satisfying the RHNA requirement as proposed would be nearly impossible to achieve without *fundamental* changes to the Town's land use framework. The Town's General Plan and Zoning Ordinance – the key elements of our Town's constitution—will need to be rewritten in order to accommodate this level of new growth. The Town requests that the final methodology take into consideration sustainability and impacts on community character.

For the reasons outlined above, the Town respectfully asks that you reconsider the allocation methodology. Thank you for your consideration, and this opportunity to provide comment.

Sincerely,



Rick DeGolia
Mayor
Town of Atherton