



November 24, 2020

Executive Board, Association of Bay Area Governments  
375 Beale Street, Suite 700  
San Francisco, CA 94105

Dear President Arreguin, Vice President Ramos, and Members of the Executive Board:

On behalf of the Town of Ross, we wish to thank the ABAG Executive Board and the ABAG Housing Methodology Committee (HMC) for the challenging work and creative thinking that has gone into distributing 441,000 new units in the 6<sup>th</sup> Cycle Regional Housing Needs Allocation (RHNA). We support the use of the Plan Bay Area 2050 Blueprint in developing the RHNA methodology, but respectfully request that the Executive Board amend the baseline to utilize the Blueprint's *Household Growth* metric instead of *Households* as proposed by the HMC.

The HMC's recommended baseline 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.

The Town of Ross faces significant constraints to development that are not accurately reflected in the *Households* baseline. More than one quarter of our parcels are within FEMA's 100-year Special Flood Hazard Area and practically the entire Town is in the Wildland Urban Interface. Additionally, small suburban communities like Ross do not have the capacity or the expectation for substantial job growth. In place of the HMC proposal, we recommend the ABAG Executive Board follow ABAG staff's July 2020 suggestion to utilize the Plan Bay Area 2050 Draft Blueprint in the RHNA methodology with each jurisdiction's share of *Household Growth* from 2010 to 2050 as the baseline.

The Town supports the *Household Growth* baseline, as it results in higher allocations for jurisdictions with significant jobs that are experiencing growth, including communities that have elected to be Priority Development Areas. 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 6<sup>th</sup> Cycle RHNA methodologies (with 3 others using baselines that factor in jobs, and one using a variety of factors). Utilizing the *Household Growth* baseline would enable the Town of Ross to prepare our General Plan Housing Element to accommodate housing development in a way that realistically considers climate change, our unique environmental conditions, and our relationship to the Bay Area's transportation network.

The Town of Ross remains committed to addressing the housing crisis. During the current RHNA cycle we have upzoned our commercial zoning district to allow as-of-right multifamily housing and in the past year we have been collaborating with other Marin jurisdictions to develop Objective Design Standards to streamline residential construction. We have also updated our Zoning Ordinance to provide additional allowable floor area for ADUs with a very low income rent restriction. We are proud of the fact that we have been able to deliver on our 5<sup>th</sup> Cycle RHNA obligation in all income categories. Again, thank you for your contribution to the region's planning and for your consideration of this request.

Sincerely,



Julie McMillan  
Mayor



Joe Chinn  
Town Manager