



January 19, 2021

Mayor Jesse Arreguin, President  
Executive Board, Association of Bay Area Governments  
375 Beale Street  
San Francisco, CA 94105

**Subject: Draft RHNA Methodology and Final Subregional Shares**

Dear Chair Arreguin:

On behalf of the City of San Rafael, we are writing to address the report on the Draft RHNA Methodology and Final Subregional Shares. Over the past year, our staff has been tracking and participating in the RHNA methodology process. Up until December 2020, we have been relying on the draft RHNA share allocated to us that was presented in the Baseline 2050 Households Draft Blueprint. This Draft Blueprint allocation was 2,785, which is a 177% increase from our allocation under the current Housing Element cycle (1,007). We anticipated a substantial increase in our share, so we have been actively planning to address it in this next Housing Element cycle. This planning has included efforts such as the development of a Downtown San Rafael Precise Plan; this Plan has been prepared to accommodate a substantial increase in housing growth.

At the beginning of the New Year, we were informed that an update of the Final Subregional Shares had been completed and published on December 18, 2020. No formal notification was provided to announce this update. In reviewing the update, we were surprised to see that our RHNA share increased by 17% from the previous draft share for this next cycle (from the initial share of 2,785 to 3,252). We were informed by ABAG/MTC staff that the baseline allocation was adjusted factoring in the Plan Bay Area 2050 Households Final Blueprint. However, to date, the local jurisdiction projections for the Plan Bay Area 2050 Final Blueprint have not been made available. Without access to the local jurisdiction projections, it difficult to understand the rationale and justification for the 17% increase in our RHNA share. Therefore, we object to the last-minute increase in our RHNA for which we had no notice or involvement in the update process.

With appreciation for your Bay Area regional work, we thank you for your time and consideration.

Sincerely,

Mayor Kate Colin

Jim Schutz, City Manager.