



Date: January 20, 2021

ABAG Executive Board
375 Beale Street, Suite 700
San Francisco, CA 94105

Sent via first class mail and email to: gadams@bayareametro.gov

RE: Reconsideration of San Bruno Regional Housing Need Allocation (RHNA) 6 Allocation
– Item 11.b.

Dear Honorable Executive Board President Jesse Arreguin and Executive Board Members,

The City of San Bruno formally requests reconsideration of its RHNA 6 allocation. As shown in the October 2020 public release, the proposed draft of 2,130 housing units allocated for San Bruno represented an 85% increase from our RHNA 5 allocation. While the increase is significant, we did not contest the October RHNA 6 allocation, as we understood it to reflect San Bruno's fair share of the region's housing need.

However, the current draft RHNA 6 allocation, that was released on December 18, 2020, dramatically increased San Bruno's allocation. The December draft RHNA 6 allocation resulted in an additional 50% increase for the City of San Bruno from allocations that were made public in October (from 2,130 to 3,192 housing units for San Bruno, an increase of 1,062 housing units).

Further, **when compared to San Bruno's prior RHNA 5 allocation of 1,155, the December draft RHNA 6 allocation of 3,192 amounts to a staggering 176% increase.** Approval of this allocation will be considered by the Executive Board at its January 21, 2021 meeting. We respectfully request reconsideration of the RHNA 6 allocation to the City of San Bruno.

The percentage increase is the second highest within the Bay Area, the most within San Mateo County, and are the result of the integration of the Plan Bay Area 2050 Final Blueprint into the Draft RHNA Methodology.

San Bruno staff met with ABAG Plan Bay Area staff during office hours on January 19, 2021 to better understand the justification for the dramatic RHNA increase. ABAG staff noted that the increase was due to final adjustments to the Plan Bay Area Blueprint 2050 that shifted new housing growth to areas with projected job growth and transit rich communities. While it is

understandable that priority shift, it does not adequately explain the 50% increase in housing allocation for City of San Bruno while other similar transit rich communities realized a housing allocation decrease.

ABAG staff also noted that the December 18, 2020 allocation considered implication of public lands strategy, aging shopping malls, office parks and pipeline projects. It should be noted that much of the properties near San Bruno's two transit stations (BART and Caltrain) cannot be developed as housing due to its close proximity to San Francisco International Airport and the land use restrictions imposed through the Airport Land Use Compatibility Plan.

The City's objection to the proposed methodology is not an indication that the City is unwilling to do its part to address the regional housing shortage. In 2013, the City adopted the Transit Corridors Plan which incentivizes high density, mixed-use development near the city's Caltrain Station. Then in 2014, the residents of San Bruno voted to increase height limits within the City to allow implementation of the plan, which allowed for the creation of 1,610 dwelling units. Clearly, the city has proven its commitment to housing production.

For the release of the proposed RHNA methodology in October 2020, ABAG included a public comment period on the proposed methodology which closed on November 27, 2020. It does not appear that a similar public comment period was held for the current draft methodology that was released on December 18, 2020. The lack of public comment on the December release leaves City of San Bruno with no other option but to express our concerns in this letter.

Again, City of San Bruno respectfully requests the ABAG Executive Board to reconsider this dramatic increase imposed to San Bruno and to allow a more equitably distribution of the allocation increase to other jurisdictions that have transit stations and projected employment growth. Make no mistake, though we have serious concerns about the methodology behinds the latest draft RHNA allocation, San Bruno remains strongly committed to doing its part to address the housing needs in the Bay Area.

Sincerely,



Rico E. Medina
Mayor



Jovan D. Grogan
City Manager

cc: Marty Medina, San Bruno Councilmember & ABAG General Assembly Representative
Gillian Adams, Principal Planner, Regional Housing Needs Allocation (RHNA)