Ford Greene
Mayor

Brian Colbert
Vice Mayor

Steve Burdo
Council Member

Alexis Fineman
Council Member

John Wright
Council Member

TOWN OF
SAN ANSELMO
EST. 1907

525 San Anselmo Avenue, San Anselmo, CA 94960-2682
(415) 258-4600 | Fax (415) 459-2477
www.townofsananselmo.org

October 13, 2020

Mayor Jesse Arreguín, President
Association of Bay Area Governments (ABAG) Executive Board
375 Beale Street, Suite 700
San Francisco, CA 94105-2066

> Re: Request for Use of Plan Bay Area 2050 Household Growth as Baseline for RHNA
> Methodology

Dear Board President Arreguín:

The Town Council of the Town of San Anselmo submits the following comments on the proposed Regional Housing Needs Allocation (RHNA) methodology recommended by the ABAG Housing Methodology Committee (HMC). San Anselmo respectfully requests the ABAG Executive Board to modify the RHNA methodology baseline to the *Plan Bay Area 2050 Blueprint Household Growth*. A revision to the baseline proposed by HMC is necessary to further the intent of statutorily mandated objectives and for the RHNA to be consistent with Plan Bay Area 2050.

The methodology recommended by the HMC 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*.

Small jurisdictions are being set up for failure under the proposed methodology. San Anselmo's proposed RHNA is 700% higher than our current RHNA, amounts to more units than it has been

allocated over the last four RHNA cycles combined, and exceeds the number of units that have been built in the Town over the past 50 years.

In place of the HMC proposal, we recommend the Executive Board follow ABAG staff's July 2020 suggestion to use the *Draft Blueprint* in the RHNA methodology by using each jurisdiction's share of **Household Growth** from 2010 to 2050 as the baseline. While the Town would prefer a baseline that includes jobs, we support 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. "This approach is consistent with how long-range forecasts have been used in ABAG's methodologies for previous RHNA cycles." (July 9, 2020, HMC Meeting #8, Item 6a, Attachment A, Page 3). In addition, 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 6th Cycle RHNA methodologies (with 3 others using baselines that factor in jobs, and one using a variety of factors). The advantages of this baseline are summarized by ABAG staff (July 9, 2020, HMC Meeting #8, Item 6a, Attachment A, Page 3):

- Simple and straightforward to implement and discuss (e.g., "the methodology aligns with growth predicted by Plan Bay Area 2050")
- Integrates transit, hazards, and market feasibility through strategies and modeling
- Better aligned with Plan Bay Area 2050
- Emphasis on current and future employment development patterns leads to RHNA allocations more focused in Silicon Valley, region's largest job center
- Higher RHNA allocations in high resource areas near major job centers – notably in the South Bay

The baseline proposed by HMC, in combination with the additional factors and weights for allocating units by income category, result in allocations inconsistent with the Plan Bay Area Blueprint. For example, San Anselmo is forecasted to grow by fewer than 1,000 households during the 30 year Plan Bay Area 2050, but under the proposal, the Town is assigned 750 housing units for the first eight years of the Plan period. On a larger scale, the Household baseline fails to proportionally assign units to urban jurisdictions that are experiencing growth in both jobs and housing, and where housing will actually be built. For example, the proposed methodology allocates San Jose fewer units than San Francisco, even though Plan Bay Area forecasts that San Jose will create a half million jobs and San Francisco 182,000 jobs by 2050. However, using the **Household Growth** baseline, San Jose receives more units than San Francisco in an amount that is equal to 1/3 of San Jose's forecasted household growth in 30 years.

Finally, the Town requests that ABAG add to the *2050 Plan Bay Area Blueprint* Wildland-Urban Interface Fire Threat areas for the San Francisco Bay Region, which is available in the Metropolitan Transportation Commission Map Gallery. Currently, only CAL FIRE Very High Severity zones are factored into the Plan, which do not adequately represent wildfire risk in the Bay Area.

Thank you for your time and consideration.

Sincerely,

Ford Greene, Mayor

cc: Dennis Rodoni, Supervisor, County of Marin
        Pat Eklund, Mayor Pro Tem, City of Novato

I certify this is a true and correct copy of the Letter entitled "Request for Use of Plan Bay Area 2050 Household Growth as Baseline for RHNA methodology" that was unanimously passed by the San Anselmo Town Council.

Carla Kacmar

4C031B9BE9AA4A1...

Carla Kacmar, Town Clerk