



CITY OF PIEDMONT  
CALIFORNIA

August 27, 2020

Housing Methodology Committee Members  
ASSOCIATION OF BAY AREA GOVERNMENTS  
375 Beale Street, Suite 700  
San Francisco, CA 94105

VIA ELECTRONIC MAIL

Re: City of Piedmont Comments on 6th Cycle RHNA Methodology

Dear Mayor Arreguín, Housing Methodology Committee Members, and ABAG Staff:

Thank you for your continued efforts to develop a methodology for equitably allocating the San Francisco Bay Area's housing needs. The City of Piedmont appreciates the contributions of staff and Housing Methodology Committee (HMC) members, and the opportunity to provide these comments.

The City of Piedmont is committed to increasing its supply of housing and expanding the variety of housing types available in our community, including affordable housing. We are writing now because the preliminary allocations shared with the HMC at its August 13<sup>th</sup> special meeting suggest that further revisions to the allocation model are needed before the numbers are finalized. The proposed approach produces skewed results for many of the region's smaller cities, with 8-year RHNA assignments that vastly exceed 30-year regional growth forecasts for these communities. In general, small communities have a very small share of the region's transit and transportation infrastructure, limited land supply, and severe growth constraints, including high fire hazards.

We request further information on the methodology for calculating the household growth projections for the City of Piedmont in the draft 2050 Households Blueprint (draft Blueprint), as the data for Piedmont is not consistent with prior forecasts or the City's physical limitations. According to the ABAG bar charts included in the agenda packet for the August 13<sup>th</sup> HMC meeting, Piedmont's draft RHNA using the "2050 Households Blueprint Baseline" ranges from 530 to 560 units. By comparison, the 30-year growth forecast (2010-2040) for Piedmont expressed in ABAG's Plan Bay Area 2040 was 50 households total.

It appears that one of the reasons for this sharp spike in the number of housing units is because the baseline 8-year growth projection in the draft 2050 Blueprint for Piedmont is 440 units. The Blueprint jurisdictional growth projections were not available for public review until August 11, 2020. As stated in the City's comment letter sent to you and ABAG on August 10, 2020, more time must be provided to cities and the general public to evaluate the accuracy of the data inputs in the draft 2050 Blueprint and the assumptions used in the modeling of future growth.

The City understands that the draft Blueprint for Plan Bay Area 2050 expects high resource areas and transit rich areas to provide more housing than in years past. In order to fully participate in the regional planning process and the discussions surrounding housing equity and social justice, the City of Piedmont continues to request greater transparency in the methodology used by ABAG staff to develop the draft Blueprint growth projections.

Just as ABAG considers jobs, transit, and high opportunity areas as weighting factors in its model, land supply constraints also should be considered. In Piedmont's case, the City is 1.7 square miles and landlocked. Piedmont was developed between 1910 and 1930 and reached buildout in the 1960s. Its developable land supply consists of approximately 60 scattered single-family lots, many located on very steep slopes or on narrow streets. The City has 3.7 acres of commercial/mixed-use zoned land and 3.7 acres zoned multi-family, all of it developed.

If every parcel in the commercial/mixed-use and multi-family zones were to be redeveloped at 20 units per acre, the City could realize an increase of approximately 100 net housing units. Piedmont has worked hard to meet its prior RHNA through innovative programs aimed at accessory dwelling unit (ADU) production, taking advantage of the sites available in the single-family zone. Piedmont was one of the first cities in the Bay Area to provide incentives for rent-restricted ADUs serving very low income residents, through an award winning program. Piedmont was also one of the few Bay Area cities to entirely meet its RHNA requirement for very low-income households during the last (2007-2014) cycle.

The City of Piedmont coordinates other housing programs such as the Measure A1 (2016) housing bond and federal housing programs with Alameda County to address the housing crisis with a county-wide strategy. Piedmont property owners have already voted to assess their properties over \$17 million for the life of the bond in order to build state-of-the-art affordable housing with the social services and access to transit and jobs that are needed to make housing programs successful. The majority of Measure A1's \$580 million made available for affordable housing will be spent in Oakland, Berkeley, Hayward and unincorporated Alameda County, where large parcels of land are available, supported by transportation infrastructure.

The City of Piedmont was allocated \$2.2 million of Measure A1 funding. Using the Measure A1 funds, as well as SB 2 and LEAP grants, we are about to embark on a planning project to explore new ways to increase production during the next RHNA cycle. Due to the relatively small amount of Measure A1 funding and the City's physical constraints, we estimate that the resulting increase in housing will be constrained. The City of Piedmont will continue to search for creative solutions to substantially increase housing production in the future. City staff would like to share these successful strategies and remaining challenges in discussions with ABAG staff as part of the regional planning process.

In addition, a portion of the City of Piedmont is designated as Very High Fire Hazard Severity Zone by the State of California. The remainder of the City is designated as a Wildfire Urban Interface (WUI) Zone and at extreme risk during a wildfire due to the City's topography, which

includes canyons and steep hillsides. Existing roads developed between 1910 and 1930 are very narrow and winding. The marginal and inadequate streets already increase emergency response times above industry standards and are expected to hinder evacuation in the event of a wildfire or other emergency.

Careful planning is required to site new housing to not add to the delay in response by emergency personnel and not negatively impact evacuations, avoiding property damage and casualties in a major disaster.

In closing, we urge the HMC to continue to refine its model to include an adjustment or weighting factor for smaller cities that have been acknowledged by ABAG (through its prior forecasts) to have limited growth potential. The job of implementing the RHNA will ultimately fall to local elected leaders who must be able to answer constituents' questions and concerns. Our community stands ready to plan for a much higher RHNA than we've seen in the past, but ask that you give due consideration to the physical constraints and natural hazards that inform local land use decisions.

Sincerely,

CITY OF PIEDMONT

A handwritten signature in black ink that reads "Sara". The signature is fluid and cursive, with a long, sweeping underline that extends to the left.

Sara Lillevand  
City Administrator

CC: City Council

ABAG Regional Housing Needs Allocation Staff, via [RHNA@bayareametro.gov](mailto:RHNA@bayareametro.gov)  
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