

Tri-Valley Cities

DANVILLE • DUBLIN • LIVERMORE • PLEASANTON • SAN RAMON

October 8, 2020

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

Dear Mayor Arreguin:

On behalf of the Tri-Valley Cities of Danville, Dublin, Livermore, Pleasanton and San Ramon, we once again want to thank you and express our appreciation for your work on the 6th Cycle RHNA process, and to develop a methodology that appropriately and fairly distributes the 441,176 unit RHND recently allocated to the Bay Area by the State Department of Housing and Community Development (HCD).

On September 18, 2020, the Housing Methodology Committee voted to adopt methodology "Option 8A" that utilizes the "Plan Bay Area 2050 Future Households" Baseline; and applies a series of Factors that adjust the Baseline allocation, with a strong equity focus ("Access to High Opportunity Areas"), and secondarily, jobs proximity, with the greatest weight given to jobs accessible by auto.

The Tri-Valley Cities have significant concerns with the HMC's recommendation, particularly that it would have several negative outcomes in terms of its resultant distribution of housing growth, inconsistent with Plan Bay Area and key regional planning goals.

For Option 8A, these include housing allocations to Santa Clara County that fall far short of those projected in Plan Bay Area, and that fail to match the explosive jobs growth in the County over the past decade. And, significantly, we conclude the RHNA distribution resulting from Option 8A will work against key regional planning goals, including those to address GHG emissions by placing housing near jobs and transit centers, instead driving growth outwards, perpetuating sprawl and inefficient growth patterns.

As result, we would urge the Executive Board to consider an Alternative Methodology that 1) Uses the 2050 Household Growth Baseline; and 2) makes additional refinements to the Factors to allow for greater emphasis on transit and jobs access, while still maintaining an equity focus.

Impacts of HMC Recommended Methodology

A letter was submitted by the Contra Costa Mayors Association on October 2, 2020, outlining some very significant impacts of the proposed Baseline methodology, and contrasting it with the alternative "2050 Plan Bay Area Growth Baseline" that was dismissed with limited analysis during the HMC process.

We have reviewed and concur with all of the points raised in the Contra Costa County letter, including, as noted, that the Baseline would significantly under allocate new housing to Santa



Clara County, resulting in significantly higher allocations to other counties. This means that the methodology fails to adequately address the significant jobs-housing imbalance in Santa Clara County caused by its recent extraordinary jobs growth. In contrast to Plan Bay Area, which anticipates a 42% increase in housing growth in Santa Clara, the methodology assigns only 32% of the RHND there. This amounts to over 40,000 units allocated elsewhere in the region – most problematically, to our outer suburbs, small cities, and rural and unincorporated county areas.

The Contra Costa letter highlights some of the inequitable and unrealistic distributions to smaller cities across the region. In Danville, here in the Tri-Valley, the difference would amount to over 1,800 units, a more than 700% difference from the 2050 Growth Baseline. Similarly, large disparities are seen in other small cities.

Although the HMC's Option 8A provides an emphasis on equity and fair housing that is vitally important, we believe the unintended consequences of the growth patterns dictated by Option 8A may actually work against equity goals by:

- Inadequately addressing jobs-housing imbalances in the region requiring people to travel long distances from where they live to where they work.
- Driving growth from cities that want and need new housing to serve their communities and support their local economies.
- Underemphasizing transit access, thus increasing auto reliance for daily commutes and activities – at a significant economic, social and environmental cost to those residents.

Recommended Alternative Baseline and Factors

Similar to the approach advocated by Contra Costa County, we would urge the Executive Board to consider an Alternative to Option 8A, that shifts to use the “Plan Bay Area 2050 Growth” Baseline. We would also seek further refinements to the Factors as follows:

Baseline	HMC Option 8A	Proposed Alternative Methodology
	Plan Bay Area 2050 Households	Plan Bay Area 2050 Growth
Factors and Weighting		
Very-Low and Low Income Units	<ul style="list-style-type: none"> • 70 % Access to High Opportunity Areas • 15 % Jobs Proximity – Auto • 15 % Jobs Proximity - Transit 	<ul style="list-style-type: none"> • 60 % Access to High Opportunity Areas • 20 % Jobs Proximity – Auto • 20 % Jobs Proximity - Transit
Moderate and Above Moderate Income Units	<ul style="list-style-type: none"> • 40 % Access to High Opportunity Areas • 60 % Jobs Proximity Auto 	<ul style="list-style-type: none"> • 20 % Access to High Opportunity Areas • 40 % Jobs Proximity - Auto • 40 % Jobs Proximity - Transit

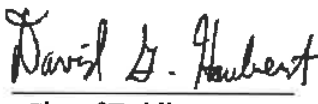
Together, these changes would have the following beneficial outcomes for the region, each of which would improve its consistency with Plan Bay Area:


- **Increased share of RHNA to the “Big Three” cities and inner Bay Area**, and a corresponding decrease in that assigned to the outer Bay Area, unincorporated, and small and rural communities by approximately 30,000 units. This will ensure that the largest share of housing growth is allocated to the region’s biggest job centers, in areas well-served by transit and infrastructure.
- **Reduced allocation to unincorporated county areas by over 10,500 units** – avoiding further residential growth pressures in areas most subject to natural hazards, lack of infrastructure capacity, and threatened loss of agricultural and open space land.
- **Alignment of the share of housing growth in Santa Clara County to match Plan Bay Area 2050 and the County’s significant jobs growth of the past decade.** Santa Clara, home of some of the region’s largest tech firms, has the largest numeric deficit in housing production to jobs production over the past decade, which could be corrected in part by this adjustment.

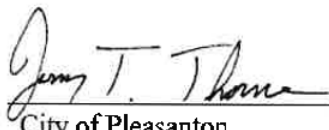
We appreciate the opportunity to bring forward this Alternative Methodology, and request that the Executive Board be provided an opportunity to duly consider this alternative in their forthcoming deliberations on the RHNA Methodology.


Respectfully,


Town of Danville
Mayor Karen Stepper


City of Dublin
Mayor David Haubert

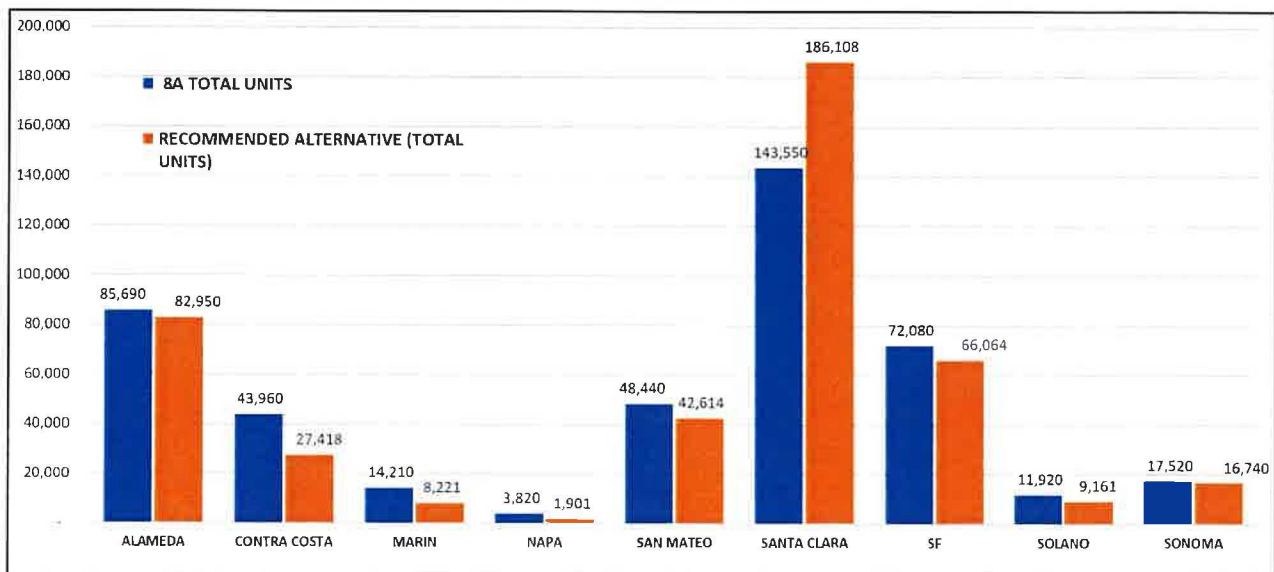
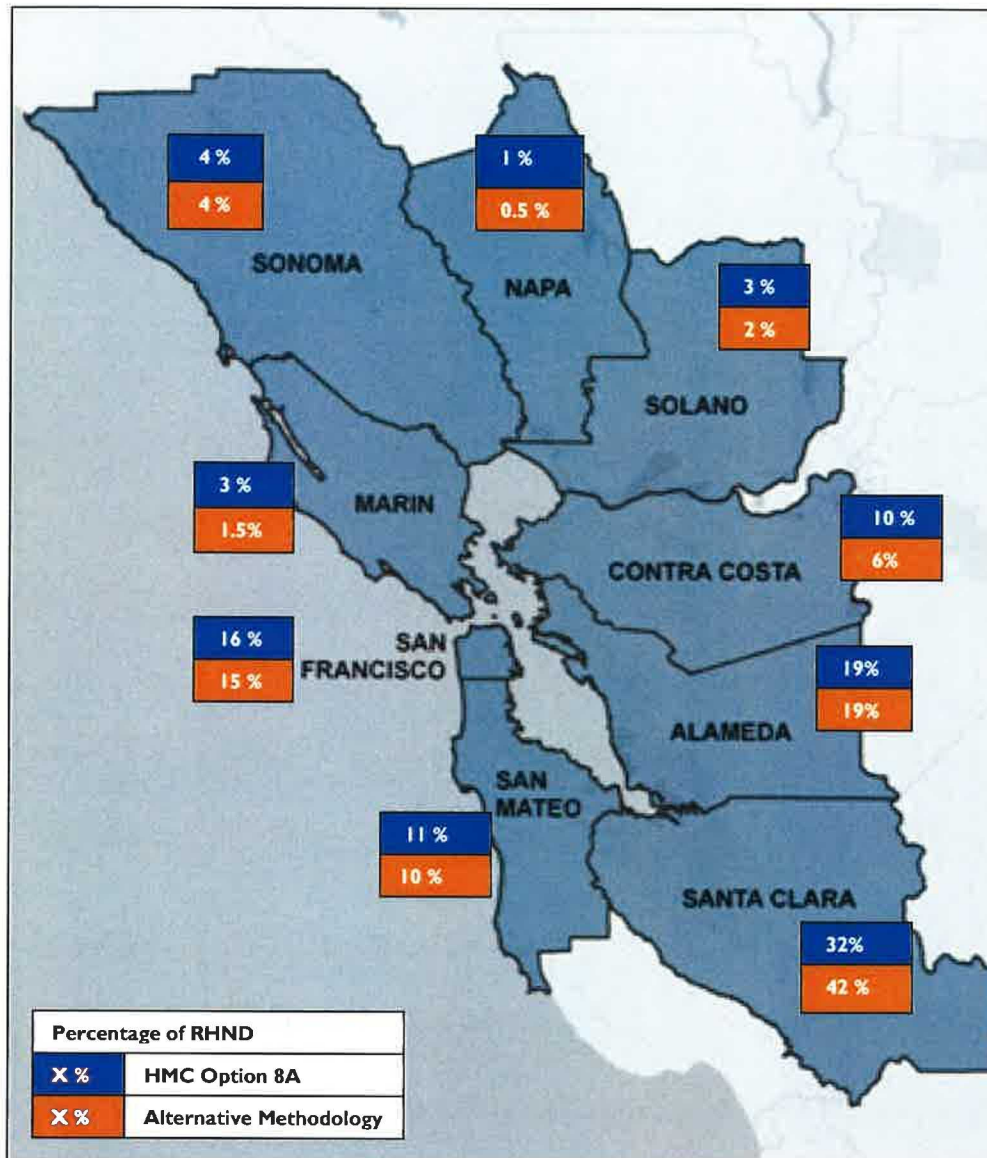

City of Livermore
Mayor John Marchand


City of Pleasanton
Mayor Jerry Thorne


City of San Ramon
Mayor Bill Clarkson

Attachments:

1. Map and Chart of County-by-County Allocations under Option 8A and Alternative Methodology
2. Summary of Jurisdiction-Specific Allocations



JURISDICTION						
County	City	HMC OPTION 8A (PBA 2050 Total Household Baseline)	ALTERNATIVE METHODOLOGY (PBA 2050 Growth Baseline + Revised Factors)	EFFECT OF CHANGE	% Change	
ALAMEDA	Alameda	4,900	3,252	(1,648)	-34%	↓
	Albany	1,150	405	(745)	-65%	↓
	Berkeley	7,730	4,690	(3,040)	-39%	↓
	Dublin	3,630	3,758	128	4%	↑
	Emeryville	1,500	3,767	2,267	151%	↑
	Fremont	14,310	12,259	(2,051)	-14%	↓
	Hayward	4,150	2,847	(1,303)	-31%	↓
	Livermore	3,980	4,072	92	2%	↑
	Newark	1,790	2,460	670	37%	↑
	Oakland	27,280	36,545	9,265	34%	↑
	Piedmont	600	73	(527)	-88%	↓
	Pleasanton	4,790	3,637	(1,153)	-24%	↓
	San Leandro	3,130	1,893	(1,237)	-40%	↓
	Unincorporated Alameda	4,530	1,233	(3,297)	-73%	↓
	Union City	2,220	2,059	(161)	-7%	↓
County Total:		85,690	82,950	-2,740	-3%	
% Regional Allocation		19.42%	18.80%			
CONTRA COSTA	Antioch	2,480	1,831	(649)	-26%	↓
	Brentwood	1,480	1,447	(33)	-2%	↓
	Clayton	600	217	(383)	-64%	↓
	Concord	3,890	1,799	(2,091)	-54%	↓
	Danville	2,170	218	(1,952)	-90%	↓
	El Cerrito	1,180	962	(218)	-18%	↓
	Hercules	680	300	(380)	-56%	↓
	Lafayette	1,660	855	(805)	-48%	↓
	Martinez	1,350	239	(1,111)	-82%	↓
	Moraga	1,050	685	(365)	-35%	↓
	Oakley	930	975	45	5%	↑
	Orinda	1,140	389	(751)	-66%	↓
	Pinole	580	360	(220)	-38%	↓
	Pittsburg	1,640	1,295	(345)	-21%	↓
	Pleasant Hill	1,870	948	(922)	-49%	↓
	Richmond	4,180	5,064	884	21%	↑
	San Pablo	800	447	(353)	-44%	↓
	San Ramon	4,720	3,123	(1,597)	-34%	↓
	Unincorporated Contra Costa	5,830	1,929	(3,901)	-67%	↓
	Walnut Creek	5,730	4,337	(1,393)	-24%	↓
County Total:		43,960	27,418	-16,542	-38%	
% Regional Allocation		9.96%	6.21%			
MARIN	Belvedere	160	86	(74)	-46%	↓
	Corte Madera	710	440	(270)	-38%	↓
	Fairfax	530	203	(327)	-62%	↓
	Larkspur	1,020	540	(480)	-47%	↓
	Mill Valley	830	26	(804)	-97%	↓
	Novato	2,110	1,473	(637)	-30%	↓
	Ross	120	24	(96)	-80%	↓
	San Anselmo	750	194	(556)	-74%	↓
	San Rafael	2,780	2,948	168	6%	↑
	Sausalito	740	208	(532)	-72%	↓
	Tiburon	630	300	(330)	-52%	↓
	Unincorporated Marin	3,830	1,779	(2,051)	-54%	↓
County Total:		14,210	8,221	-5,989	-42%	↓
% Regional Allocation		3%	2%	-1.4%		

JURISDICTION						
County	City	HMC OPTION 8A (PBA 2050 Total Household Baseline)	ALTERNATIVE METHODOLOGY (PBA 2050 Growth Baseline + Revised Factors)	EFFECT OF CHANGE	% Change	
NAPA	American Canyon	480	445	(35)	-7%	↓
	Calistoga	210	314	104	49%	↑
	Napa	2,090	1,009	(1,081)	-52%	↓
	St. Helena	180	24	(156)	-87%	↓
	Unincorporated Napa	790	84	(706)	-89%	↓
	Yountville	70	24	(46)	-65%	↓
	County Total:	3,820 0.87%	1,901 0.43%	-1,919	-50%	↓
SAN FRANCISCO	San Francisco	72,080	66,064	(6,016)	-8%	↓
	County Total:	72,080	66,064			
	% Regional Allocation	16.34%	14.97%			
SAN MATEO	Atherton	290	29	(261)	-90%	↓
	Belmont	1,770	529	(1,241)	-70%	↓
	Brisbane	2,810	7,479	4,669	166%	↑
	Burlingame	3,450	3,749	299	9%	↑
	Colma	180	338	158	88%	↑
	Daly City	4,830	4,200	(630)	-13%	↓
	East Palo Alto	890	479	(411)	-46%	↓
	Foster City	2,030	602	(1,428)	-70%	↓
	Half Moon Bay	330	224	(106)	-32%	↓
	Hillsborough	610	120	(490)	-80%	↓
	Menlo Park	3,070	2,600	(470)	-15%	↓
	Millbrae	2,370	2,706	336	14%	↑
	Pacifica	1,930	192	(1,738)	-90%	↓
	Portola Valley	250	3	(247)	-99%	↓
	Redwood City	5,190	4,918	(272)	-5%	↓
	San Bruno	2,130	1,523	(607)	-28%	↓
	San Carlos	2,390	892	(1,498)	-63%	↓
	San Mateo	6,690	4,263	(2,427)	-36%	↓
	South San Francisco	3,980	5,067	1,087	27%	↑
	Unincorporated San Mateo	2,930	2,674	(256)	-9%	↓
	Woodside	320	27	(293)	-92%	↓
	County Total:	48,440	42,614	-5,826	-12%	↓
	% Regional Allocation	10.98%	9.66%			
SANTA CLARA	Campbell	3,960	4,576	616	16%	↑
	Cupertino	6,220	7,257	1,037	17%	↑
	Gilroy	1,470	1,572	102	7%	↑
	Los Altos	2,270	1,085	(1,185)	-52%	↓
	Los Altos Hills	540	126	(414)	-77%	↓
	Los Gatos	1,930	153	(1,777)	-92%	↓
	Milpitas	6,580	11,280	4,700	71%	↑
	Monte Sereno	190	4	(186)	-98%	↓
	Morgan Hill	1,140	1,035	(105)	-9%	↓
	Mountain View	11,390	14,815	3,425	30%	↑
	Palo Alto	10,050	13,281	3,231	32%	↑
	San Jose	66,520	95,896	29,376	44%	↑
	Santa Clara	12,050	16,240	4,190	35%	↑
	Saratoga	2,100	1,049	(1,051)	-50%	↓
	Sunnyvale	13,010	13,811	801	6%	↑
	Unincorporated Santa Clara	4,130	3,931	(199)	-5%	↓
	County Total:	143,550	185,108	42,558	30%	↑
	% Regional Allocation	32.54%	42.18%			

JURISDICTION						
County	City	HMC OPTION 8A (PBA 2050 Total Household Baseline)	ALTERNATIVE METHODOLOGY (PBA 2050 Growth Baseline + Revised Factors)	EFFECT OF CHANGE	% Change	
SOLANO	Benicia	860	178	(682)	-79%	↓
	Dixon	380	129	(251)	-66%	↓
	Fairfield	3,620	4,812	1,192	33%	↑
	Rio Vista	230	50	(180)	-78%	↓
	Suisun City	610	194	(416)	-68%	↓
	Unincorporated Solano	1,020	1,711	691	68%	↑
	Vacaville	2,030	642	(1,388)	-68%	↓
	Vallejo	3,170	1,444	(1,726)	-54%	↓
	County Total:	11,920	9,161	-2,759	-23%	↓
	% Regional Allocation	2.70%	2.08%			
SONOMA	Cloverdale	300	315	15	5%	↑
	Cotati	270	256	(14)	-5%	↓
	Healdsburg	350	289	(61)	-17%	↓
	Petaluma	2,100	1,974	(126)	-6%	↓
	Rohnert Park	1,260	916	(344)	-27%	↓
	Santa Rosa	6,530	7,260	730	11%	↑
	Sebastopol	420	689	269	64%	↑
	Sonoma	330	114	(216)	-66%	↓
	Unincorporated Sonoma	5,250	4,427	(823)	-16%	↓
	Windsor	710	499	(211)	-30%	↓
	County Total:	17,520	16,740	-780	-4%	↓
	% Regional Allocation	3.97%	3.79%			