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January 21, 2021

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Mayor Jesse Arreguin, President

ABAG Executive Board

375 Beale Street, Suite 700

San Francisco, CA 94105-2066

Sent Via Email only to: RHNA@bayareametro.gov

Re: Regional Housing Need Allocation 2022-2030

Dear President Arreguin and ABAG Executive Board Members,

Thank you for the January 19, 2021 response, prepared by Executive Director Therese W. McMillan, to our comments on the Proposed Regional Housing Needs Allocation (RHNA) Methodology. We appreciate the difficult work to ensure the Regional Housing Need Allocation is distributed in an equitable way that seeks to provide opportunity to those in need of housing while also ensuring our shared goals are addressed to develop housing near services and jobs to address climate change concerns.

On behalf of the Marin County Board of Supervisors, I am submitting this letter to articulate our ongoing concerns with the substantial increase in housing units in unincorporated areas of Marin County which lack the services and infrastructure to support the increase.

Unfortunately, ABAG's response to our comments fails to address our prior concerns and raises new concerns. Our existing concerns related to Wildfire Hazards and Flooding and Sea Level Rise were not fully addressed. We previously mentioned concern that the RHNA does not take into account wildfire hazards and flooding due to sea level rise (see our prior letter of November 13, 2020). While we appreciate that the Draft RHNA Methodology does not allow for Growth Geographies to overlap with the worst fire hazard severity zones, such as those associated with CAL Fire designated "Very High" and "High" fire severity areas, it is not clear that the allocation of the RHNA took into account the cumulative effects of overlaying the fire severity areas with low-lying unincorporated communities that are vulnerable to the impacts of sea level rise. Overlaying these constraints would illustrate the lack of suitable land that could accommodate the additional development.

In addition, it is our understanding that the RHNA Allocation Methodology and Allocations may fail to comply with statutory requirements. The high allocation to Marin County is not consistent with the objectives in Government Code 65584(d) which states:

The regional housing needs allocation plan shall further all of the following objectives: (2) Promoting infill development and socioeconomic equity, the protection of the environmental and agricultural resources, the

encouragement of efficient development patterns, and the achievement of the region's greenhouse gas reductions targets."

Although the unincorporated County includes a large land area, over 82 percent is protected as agricultural land, Federal, State and local parks and open space. In addition, as mentioned above, the County is constrained by wildfire hazards and flooding and sea level rise. Developable land supply is insufficient to meet the numbers proposed in the Draft RHNA methodology. In addition, it is contrary to the policies that have been in place for decades supporting housing in cities and towns in areas near transit, services and jobs which will assist in reducing greenhouse gas emissions. In fact, disproportionately allocating housing units for the unincorporated areas could create the unintended effect of encouraging sprawl and inefficient service delivery by having development located outside of cities and towns at a higher density than what may be allowed under the cities' and towns' general plans.

While the County has strong policies to encourage and facilitate accessory dwelling units, they cannot be relied upon to meet a substantial number of our proposed RHNA units for a number of reasons - including lack of infrastructure available through individual septic disposal systems, inadequate road network providing for emergency evacuations, and exposing residents to hazards associated with wildfire and flooding.

Due to the points above and the issues raised in our prior comment letters, it appears that the Draft RHNA Methodology does not meet the statutory objectives. For the above stated reasons, and the reasons articulated in our prior comments, we believe the methodology and allocations must be revised to comply with the law and more importantly to assure much needed housing is feasible and will be built in locations capable of meeting statutory objectives.

Thank you for the opportunity to comment.

Sincerely,

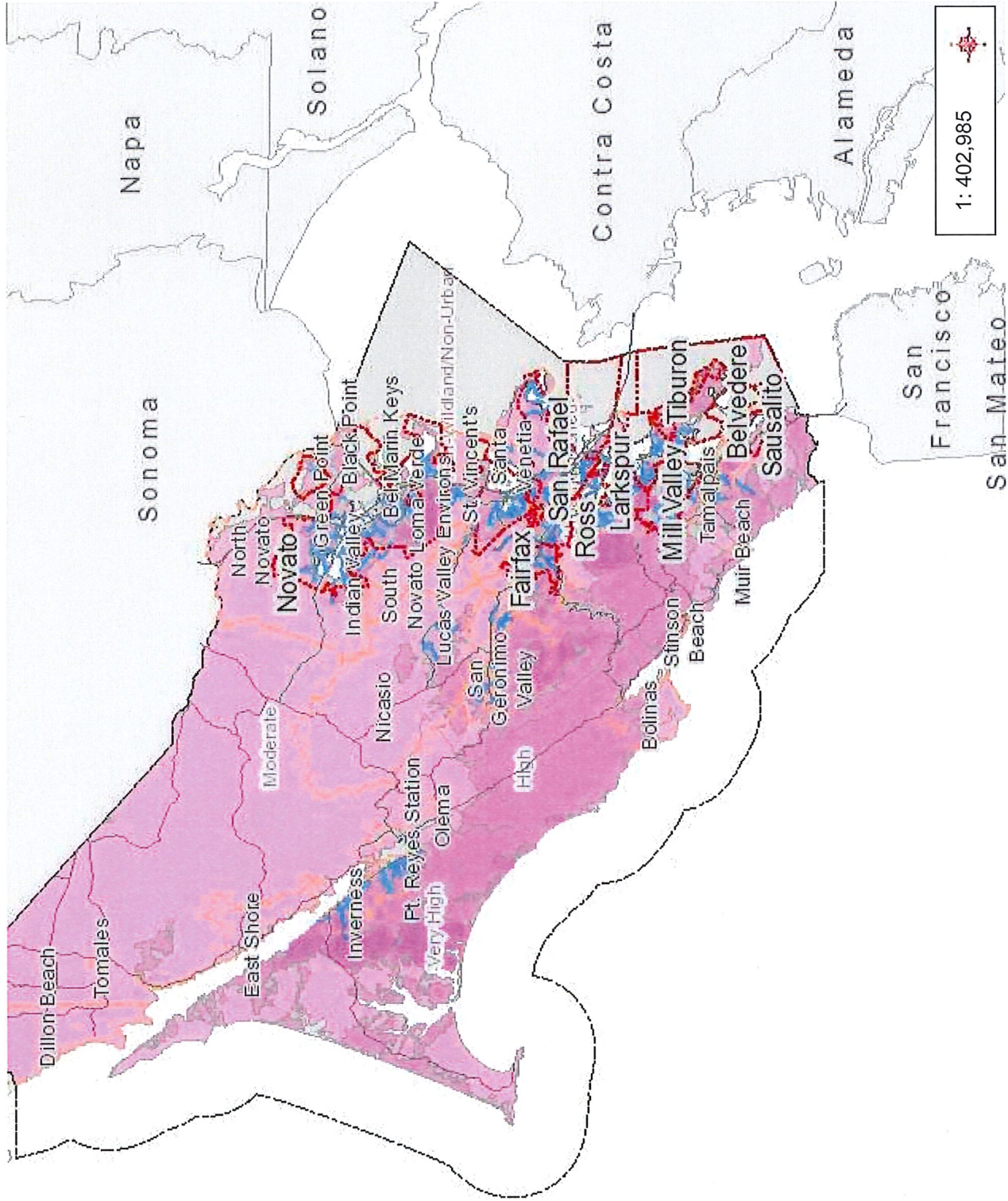


Dennis Rodoni, President
Marin County Board of Supervisors

Cc: Senator Mike McGuire
Assembly Member Marc Levine
Marin County Board of Supervisors

Attachments: (1) Marin County Fire Hazard Severity Zone Map
(2) Marin County Sea Level Rise Map

Map Report

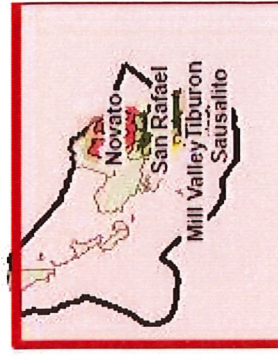


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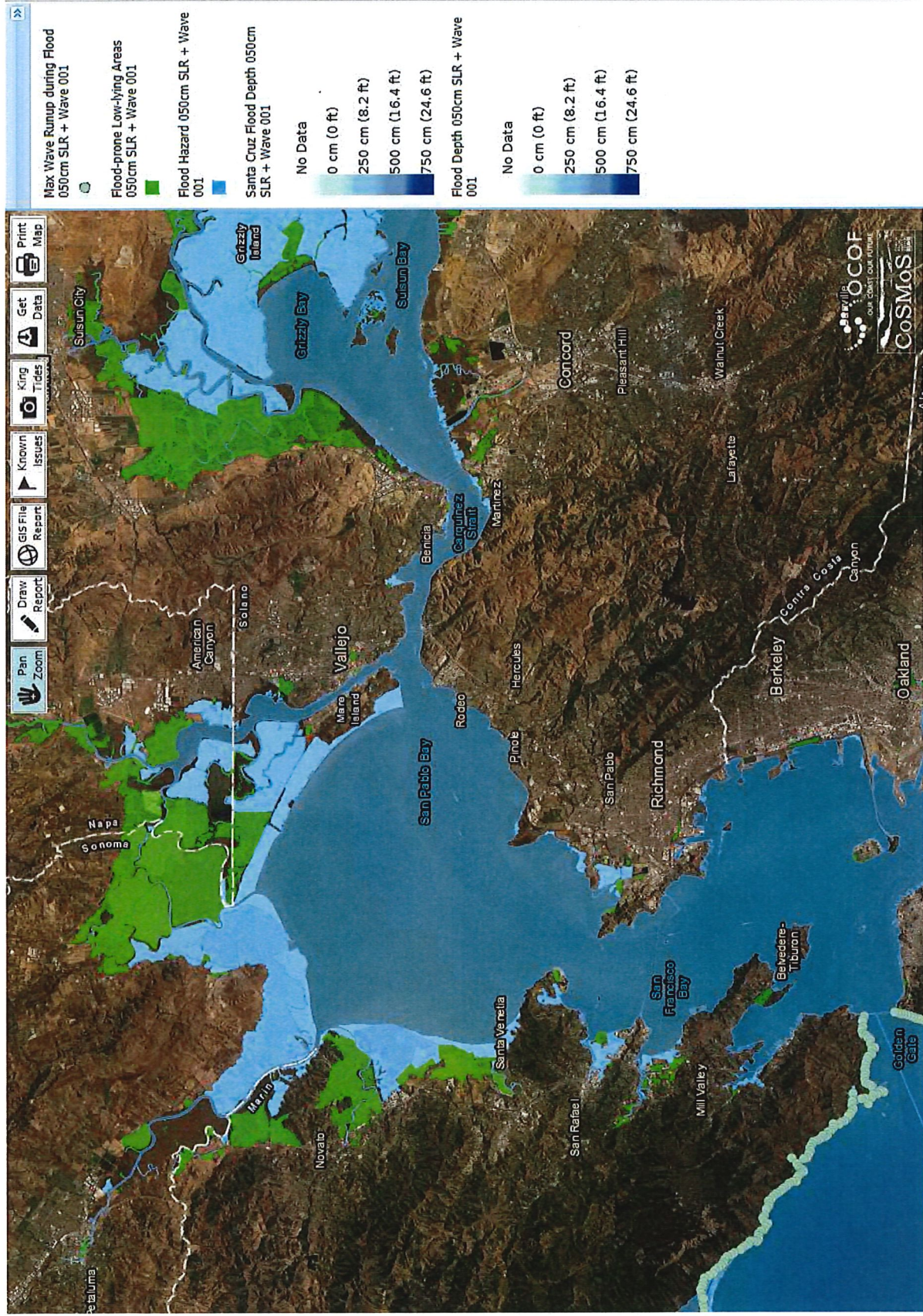


Legend

- Parcel Note
 - easement
 - centerline
- Major Road
- City
- Community
- Marin County Legal Boundary
- Other Bay Area County
- Evacuation Routes
 - Primary
 - Secondary
- Fire Hazard Severity Zone
 - Very High
 - High
 - Moderate
 - Non-Wildland/Non-Urban
 - Urban Unzoned
- Stream - Perennial (NHD)

Notes

Marin County Sea Level Rise Map (50cm Sea Level Rise)



Source: Our Coast Our Future