City of Larkspur

400 Magnolia Avenue, Larkspur, California 94939
Telephone: (415) 927-5110 Fax: (415) 927-5022
Website: www.cityoflarkspur.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 Plan Bay Area 2050 Household Growth as Baseline for Regional Housing Needs Assessment Methodology

Mayor Arreguín:

On behalf of the Larkspur City Council, we submit the following comments on the proposed Regional Housing Needs Allocation (RHNA) methodology recommended by the ABAG Housing Methodology Committee (HMC). Foremost, we want to emphasize that the Larkspur City Council acknowledges the region-wide need for more housing and is committed to planning for our fair share of that growth. The Council is very appreciative of the work done by the ABAG staff and the HMC.

The Larkspur City Council recommends 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 City would strongly prefer a baseline that includes jobs, we support the Household Growth baseline as it results in allocations that reflect jurisdictions with significant jobs that are experiencing growth, including communities that have elected to identify Priority Development Areas in their jurisdictions. "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). This approach to use the Plan Bay Area 2050 *Growth* baseline would seem more consistent with the intent of the Plan to encourage housing development in proximity to job centers, which reduces transit and transportation congestion and long commute patterns to meet greenhouse gas reduction targets (consistent with AB 32 and SB 375).

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 Larkspur City Council understands the challenge of balancing competing interests when developing a model such as that used to calculate RHNA. That said, recent wildfire seasons require reevaluation of plans and priorities that would intensify development in and around wildland-urban interface (WUI) fire threat areas. The methodology before the Executive Board distributes considerable portions of the RHNA to suburban and rural communities constrained by WUI and creates the very real possibility that these communities will have to plan for more housing in these high-risk areas. We urge the Executive Board to consider amending the methodology to consider Wildland-Urban Interface Fire Threat Areas rather than CAL FIRE Very High Severity zones. We also believe greater recognition of the locations of flood plains and shorelines vulnerable to sea-level rise will better inform the RHNA process and lead to allocations that have a higher probability of resulting in safe, affordable new housing units.

Sincerely,

Kevin Haroff

Kevin Haroff
Vice-Mayor and Larkspur ABAG Representative

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