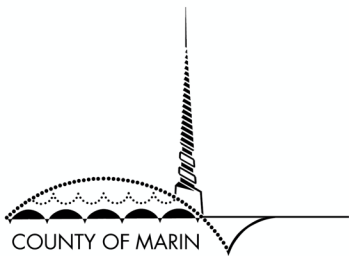


Jurisdiction Illustrative Allocations by Income Category

Note: the jurisdiction-specific allocations shown are for illustrative purposes only. ABAG will issue Final Allocations by the end of 2021.

Jurisdiction	Jurisdiction Share of 2050 Households*		Proposed RHNA Methodology (Baseline: 2050 Households - Draft Blueprint)					Draft RHNA Methodology (Baseline: 2050 Households - Final Blueprint)					Comparison of Total RHNA	
	Draft Blueprint	Final Blueprint	Very Low Income	Low Income	Moderate Income	Above Moderate Income	Total	Very Low Income	Low Income	Moderate Income	Above Moderate Income	Total	Unit Change from Proposed to Draft	Percent Change from Proposed to Draft
Belvedere	0.033%	0.032%	49	28	23	61	161	49	28	23	60	160	(1)	-1%
Corte Madera	0.135%	0.138%	209	121	106	274	710	213	123	108	281	725	15	2%
Fairfax	0.104%	0.098%	158	91	75	195	519	149	86	71	184	490	(29)	-6%
Larkspur	0.197%	0.189%	303	175	150	390	1,018	291	168	145	375	979	(39)	-4%
Mill Valley	0.161%	0.164%	248	142	124	320	834	252	144	126	326	848	14	2%
Novato	0.669%	0.672%	582	335	332	858	2,107	583	336	332	860	2,111	4	0%
Ross	0.023%	0.022%	35	20	17	44	116	33	19	16	41	109	(7)	-6%
San Anselmo	0.149%	0.167%	226	130	108	280	744	253	145	121	314	833	89	12%
San Rafael	0.895%	1.048%	752	433	446	1,154	2,785	877	504	521	1,350	3,252	467	17%
Sausalito	0.125%	0.125%	200	115	115	296	726	200	115	114	295	724	(2)	0%
Tiburon	0.123%	0.126%	186	107	91	236	620	193	110	93	243	639	19	3%
Unincorporated Marin	0.893%	0.822%	1,157	666	557	1,440	3,820	1,063	611	512	1,324	3,510	(310)	-8%
Marin County	3.507%	3.605%	4,105	2,363	2,144	5,548	14,160	4,156	2,389	2,182	5,653	14,380	220	2%
American Canyon	0.190%	0.176%	124	72	81	209	486	115	67	75	194	451	(35)	-7%
Calistoga	0.090%	0.052%	58	32	33	86	209	32	19	19	50	120	(89)	-43%
Napa	0.815%	0.769%	550	317	339	876	2,082	516	298	319	825	1,958	(124)	-6%
St. Helena	0.073%	0.068%	46	27	27	71	171	43	24	26	66	159	(12)	-7%
Unincorporated Napa	0.288%	0.279%	218	126	125	323	792	210	121	120	312	763	(29)	-4%
Yountville	0.031%	0.029%	20	12	12	32	76	19	11	12	30	72	(4)	-5%
Napa County	1.487%	1.373%	1,016	586	617	1,597	3,816	935	540	571	1,477	3,523	(293)	-8%
San Francisco	12.394%	14.304%	18,637	10,717	11,910	30,816	72,080	21,359	12,294	13,717	35,470	82,840	10,760	15%
Atherton	0.065%	0.072%	74	43	51	130	298	81	47	56	144	328	30	10%
Belmont	0.302%	0.305%	485	280	282	728	1,775	488	281	283	733	1,785	10	1%
Brisbane	0.742%	0.423%	573	330	534	1,382	2,819	324	187	303	785	1,599	(1,220)	-43%
Burlingame	0.572%	0.546%	926	534	555	1,434	3,449	883	509	529	1,368	3,289	(160)	-5%
Colma	0.047%	0.052%	40	24	33	86	183	45	26	37	96	204	21	11%
Daly City	1.040%	0.945%	1,150	661	841	2,175	4,827	1,039	598	762	1,971	4,370	(457)	-9%
East Palo Alto	0.219%	0.206%	179	104	169	437	889	169	97	159	410	835	(54)	-6%
Foster City	0.349%	0.327%	556	320	321	831	2,028	520	299	300	777	1,896	(132)	-7%
Half Moon Bay	0.147%	0.149%	93	54	54	141	342	93	54	54	141	342	-	0%
Hillsborough	0.107%	0.097%	169	97	95	245	606	153	88	87	223	551	(55)	-9%
Menlo Park	0.500%	0.481%	773	445	517	1,340	3,075	740	426	496	1,284	2,946	(129)	-4%
Millbrae	0.375%	0.350%	618	356	386	999	2,359	575	331	361	932	2,199	(160)	-7%
Pacifica	0.359%	0.356%	557	321	294	761	1,933	551	317	291	753	1,912	(21)	-1%
Portola Valley	0.045%	0.045%	70	41	39	101	251	70	40	39	99	248	(3)	-1%
Redwood City	1.102%	0.984%	1,284	739	885	2,291	5,199	1,141	658	789	2,041	4,629	(570)	-11%
San Bruno	0.486%	0.730%	481	278	382	989	2,130	721	415	573	1,483	3,192	1,062	50%
San Carlos	0.398%	0.455%	647	372	383	991	2,393	739	425	438	1,133	2,735	342	14%
San Mateo	1.338%	1.419%	1,722	991	1,111	2,873	6,697	1,819	1,047	1,175	3,040	7,081	384	6%
South San Francisco	0.923%	0.929%	892	513	717	1,856	3,978	892	514	720	1,863	3,989	11	0%
Unincorporated San Mateo	0.827%	0.809%	852	490	443	1,148	2,933	830	479	433	1,121	2,863	(70)	-2%
Woodside	0.057%	0.058%	90	52	51	133	326	90	52	52	134	328	2	1%
San Mateo County	10.002%	9.740%	12,231	7,045	8,143	21,071	48,490	11,963	6,890	7,937	20,531	47,321	(1,169)	-2%



BOARD OF SUPERVISORS

November 13, 2020

PRESIDENT

Katie Rice

2ND DISTRICT

VICE PRESIDENT

Dennis Rodoni

4TH DISTRICT

2ND VICE PRESIDENT

Judy Arnold

5TH DISTRICT

Damon Connolly

1ST DISTRICT

Kathrin Sears

3RD DISTRICT

Matthew H. Hymel

COUNTY ADMINISTRATOR

CLERK OF THE BOARD

Marin County Civic Center

3501 Civic Center Drive

Suite 329

San Rafael, CA 94903

415 473 7331 T

415 473 3645 F

415 473 6172 TTY

www.marincounty.org/bos

Mayor Jesse Arreguín, President
Association of Bay Area Governments (ABAG) Board
375 Beale Street, Suite 700
San Francisco, CA 94105-2066
Via email to RHNA@bayareametro.gov

Re: Proposed RHNA Methodology and Subregional Shares

Dear President Arreguín,

On behalf of the Marin County Board of Supervisors, thank you and the Housing Methodology Committee for the difficult work to ensure the Regional Housing Need Allocation is distributed in an equitable way that both seeks to provide opportunity to those in need of housing and ensures that our shared goals to put housing near services and jobs to address climate change are addressed.

We are committed to addressing housing as an issue of equity; where one lives matters a great deal to health and well-being. We recognize the role that housing policies, laws, and regulations can play in promoting neighborhood conditions that positively shape health and well-being. We are committed to providing affordable housing that provides residents the same chance to live in a safe neighborhood with great schools, healthy food options, public libraries, community centers, parks and trails, transportation hubs, and access to employment centers.

However, we are concerned that the proposed methodology adopted by the Housing Methodology Committee (HMC) and assumptions in the Blueprint 2050 will result in a significant increase in the Regional Housing Need Allocation (RHNA) in the unincorporated County that may make it impossible for us to meet these housing goals.

Marin County has a history of receiving State certification of its housing elements going back to 1970 and we wish to continue this practice. The County has adopted strong housing policy and taken a leadership role with coordinating with our cities and towns on housing. Some of our recent successes include:

- *Staffing the Housing Working Group* – In 2018, staff convened a countywide working group of planners to encourage interjurisdictional collaboration on housing issues and solutions, with a specific focus on responding to 2017 State housing Package. The working group established common goals and continues to coordinate on housing legislation, planning, production, and preservation of existing affordability.

- *SB 2 Grants* – The Housing Working Group jointly filed applications for three projects, including the Objective Design and Development Standards and ADU Workbook and Website in order to collaborate on a common strategy and save on costs and time for each participating jurisdiction.
- *Objective Design Standards* – Marin County jurisdictions hired a consultant to produce a general toolkit that will utilize existing zoning codes as a basis to produce objective standards and guidelines. This toolkit will be customized for each jurisdiction through chapters that outline architectural standards, building patterns, and historical significance.
- *ADU Workbook and Website* – The work includes updating the County website with code compliant floor plans, a calculator that estimates construction costs, homeowner spotlights, and a workbook.
- *Housing Trust Balance* – The Board has deposited over \$10 million in a local fund to be used for fund affordable housing.
- *Acquisition of the former Coast Guard Housing Facility* – after federal legislation required the land be sold to the County and years of negotiations with the Coast Guard, the County purchased the property to be developed as affordable housing.
- *Policies to prevent displacement of our existing lower income renters* – The Board of Supervisors has allocated resources and adopted policies, such as tenant protections and purchasing properties, to prevent displacement.

We understand that our share of the RHNA will increase and we are committed to increasing our housing production, especially of homes affordable to lower income households. However, the proposed methodology and assumptions could result in the unincorporated County receiving over 20 times more than the housing allocated to us in the previous cycle. With an increase of this magnitude, the County may not be able to adopt a compliant housing element unless we put housing in environmentally sensitive areas, prone to fires, flooding, and sea level rise.

Nearly half of the county's land base is protected by park or open space status. With the largest amount of public land in the nine-county Bay Area, Marin County's 118,669 acres of park and open space make up 30 percent of the County's land base, while water area and watershed lands comprise another 20 percent. Approximately 15% remains undeveloped.

- *Infrastructure* – Similar to other unincorporated counties, we lack the infrastructure to support densities of this level, especially because the increase is so magnified on such a short timeline. The goals, policies, and programs contained in the County's General Plan (Countywide Plan or CWP) direct future growth towards the City-Centered Corridor and the existing urban service areas of unincorporated communities to ensure that biotic, agricultural, open space, and other resources would be protected. Policies and programs ensure new development would be confined to areas where adequate public services are available and

coordinate the provision, timing, and funding of public services such that new growth would be appropriate to the specific area and constrained by available services such as water supply and wastewater treatment. Analysis of the Countywide Plan has demonstrated that although development is possible in the City-Centered Corridor, the development of units as required by the proposed RHNA numbers is not realistic in this area due to limited infrastructure and policies in the Countywide Plan to address sensitive habitat, high risk of wildfire, flooding, and sea level rise.

- *Wildfire Hazards* – In light of recent fire events, it is important to address fire hazards. Many unincorporated communities are considered “Communities at Risk” by the National Fire Plan because of the proximity of housing to areas susceptible to wildland fires. The California Department of forestry rates portions of Marin County either as a high, very high, or extreme fire hazard. Many of the high-risk areas are interspersed with developed areas. In addition, many of the roads to access these areas are private, narrow and substandard. New land uses and development could expose people and structures to wildland fires throughout the county, especially in areas with steep slopes, high fuel loads (i.e., dense vegetation) or inadequate emergency access.
- *Flooding and Sea Level Rise* – To address risks of flooding, the CWP requires all improvements in Bayfront, Floodplain, Tidelands, and Coastal High Hazard Zones to be designed to be more resistant to damage from flooding, tsunamis, seiches, and related water-borne debris, and to be located so that buildings and features such as docks, decking, floats, and vessels would be more resistant to damage. While the CWP does not prohibit development impacted by flooding, these are real limitations which will continue to increase as we face climate change. Calculations estimate sea level rises ranging anywhere from approximately 1-3 feet or 8.5-35.2 inches by the end of the Century, further limiting our development opportunities.

One of ABAG’s core strategies is “focused growth in communities along existing transportation networks near homes and jobs...This strategy aims to minimize development in our green fields and maximize growth in transit-rich communities, which will help lower vehicle miles traveled and greenhouse gases.” The proposed RHNA numbers in unincorporated Marin County contradict those policies as the County would be forced to develop in green fields and areas outside of transit networks, existing residential development, and job centers.¹

We would like to reiterate that we understand that RHNA is increasing and the County will be expected to do more than in the past. However, we respectfully request that you consider a methodology that will not focus growth in unincorporated areas with few services and more environmentally sensitive areas. Unincorporated areas have fewer services, infrastructure and jobs. To better reflect the realities of the constraints of unincorporated communities, we

¹ <https://abag.ca.gov/our-work/land-use/pda-priority-development-areas>

would like to endorse recommendations, such as from the Contra Costa Mayors Conference, that the **Plan Bay Area 2050 Growth** baseline be utilized, leaving the HMC-recommended factors in place.

Thank you for the opportunity to comment.

Respectfully Submitted,



Katie Rice, President
Marin County Board of Supervisors

Cc: Marin County Board of Supervisors

2023-2031 RHNA Development Timeline

