



**CITY OF LARKSPUR  
Staff Report**

November 18, 2020, City Council Meeting

DATE: November 12, 2020  
TO: Honorable Mayor Way and the Larkspur City Council  
FROM: Dan Schwarz, City Manager  
SUBJECT: PUBLIC COMMENT ON 6<sup>TH</sup> CYCLE REGIONAL HOUSING NEEDS ALLOCATION (RHNA) METHODOLOGY; REQUEST FOR PLAN BAY AREA 2050 HOUSEHOLD GROWTH AS BASELINE FOR RHNA METHODOLOGY

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**ACTION REQUESTED**

Authorize Mayor Way and Vice Mayor Haroff (as the City's ABAG representative) to sign the attached letter.

**SUMMARY AND BACKGROUND**

On October 13, 2020, the City Council held a special meeting to review and discuss the final recommendation of the Regional Housing Needs Allocation (RHNA) methodology committee. After discussion on the matter, the Council authorized the Vice Mayor to send a letter to the Association of Bay Area Government Executive Board (ABAG). Background information and details on RHNA, the methodology, and the letter to ABAG can be found here:

<https://www.ci.larkspur.ca.us/DocumentCenter/View/12174/31-ABAG-Letter>

Subsequently, the ABAG Executive Committee voted to move forward with the proposed RHNA methodology (Plan Bay Area 2050 *Households* as a baseline) and not the methodology recommended by the City Council and numerous other Marin County municipalities (Plan Bay Area 2050 *Household Growth* as a baseline).

ABAG has officially opened a 30-day comment period on the proposed methodology and staff recommends authorizing the Mayor to send the same comments to be included as part of the public comment record (see Attachment 1). The Public Comment period closes at noon on November 27<sup>th</sup>. ABAG has indicated that their staff will consider comments and will recommend any necessary adjustments to the Proposed RHNA Methodology and/or Draft Subregional Shares to the ABAG Executive Board for final adoption in the Draft RHNA Methodology and Final Subregional Shares, respectively. The ABAG Executive Board is slated to take final action on these items at its January 21, 2021 meeting

## **AGENDA ITEM 8.2**

If the methodology is approved by ABAG, it will be submitted to the State Department of Housing and Community Development (HCD) for review and approval. Staff also recommends authorizing the mayor to send the letter to HCD if the Plan Bay Area 2050 households baseline is approved by ABAG.

### **ANALYSIS**

An analysis of the Bay Area region-wide implications of the proposed RHNA methodology is offered by the Contra Costa County Mayors Conference in its letter to the Executive Board (attached). As noted, the proposed methodology shifts much of the regional allocation to suburban and rural communities within the Bay Area. Like Marin, Contra Costa includes many small suburban communities that face significant challenges in meeting these numbers.

For Larkspur, planning for an additional 1,020 units through the next RHNA cycle brings a number of competing interests into conflict. Most notably, it raises the very real possibility that the City will need to plan for intensification of development in areas that are within a wildfire-urban interface (WUI) threat area, a flood plain, or a shoreline vulnerable to sea-level rise.

There is a consensus among many communities, as reflected in the CCCMC letter, that a more appropriate baseline for the methodology using the PBA 2050 Household *Growth* baseline should be implemented. This approach is more consistent with the intent of Plan Bay Area and would distribute more housing closer to job centers, rather than suburban and rural areas. Staff has prepared a second draft letter supporting that approach to the methodology.

Staff believes it is appropriate for the City Council to submit a public comment letter to the Executive Board expressing concern that these competing policy issues do not appear to be sufficiently weighed in the current methodology.

### **FISCAL IMPACT**

None.

### **STAFF RECOMMENDATION**

Staff recommends that the Council authorize the signing of the attached letter.

Respectfully submitted,  
Dan Schwarz, City Manager

### Attachments

1. Draft letter from City Council to ABAG



# City of Larkspur

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November \_\_, 2020

Mayor Jesse Arreguín, President  
Association of Bay Area Governments (ABAG) Executive Board  
375 Beale Street, Suite 700  
San Francisco, CA 94105-2066  
[jarreguin@ci.berkeley.ca.us](mailto:jarreguin@ci.berkeley.ca.us)

Re: Request for Plan Bay Area 2050 Household Growth as Baseline for Regional Housing Needs Allocation (RHNA) Methodology

Mayor Arreguín:

On behalf of the Larkspur City Council, we submit the following comments on the proposed Regional Housing Needs Allocation (RHNA) methodology under consideration by the ABAG Executive Board. 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 Housing Methodology Committee that shaped the RHNA process to date.

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 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

## 8.2 ATTACHMENT 1

- 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 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,

Catherine Way  
Mayor

Kevin Haroff  
Vice-Mayor and Larkspur ABAG Representative

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