



**CONTRA COSTA**  
 COUNTY MAYORS CONFERENCE  
 2221 Spyglass Lane, El Cerrito, CA 94530

October 2, 2020

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

RE: Consideration of a *Modified Option 8A* using the **Plan Bay Area 2050 Growth** Baseline Methodology

Chair Arreguin,

Once again, the Contra Costa Mayors Conference (CCMC), representing all 19 cities and nearly one million citizens in Contra Costa county, wishes to convey our sincere appreciation for your efforts to facilitate an equitable distribution of the 441,176 housing units assigned to the Bay Area by the California Department of Housing and Community Development (HCD) for the next RHNA cycle (2023-2031).

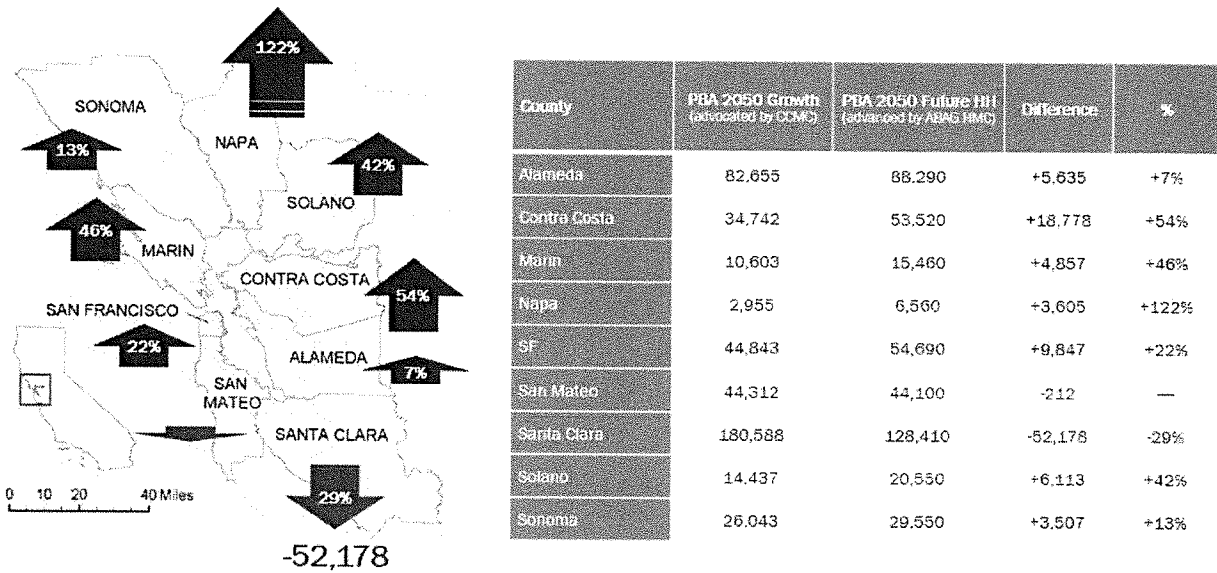
Since our last communication on August 7, 2020, the ABAG Housing Methodology Committee (HMC) has chosen to utilize "Plan Bay Area 2050 *Future Households*" methodology (a 'middle road') and a weighting of *factors* that prioritize 'access to high resource areas' over the region-wide efforts to reach a jobs/housing balance.

#### IMPACT OF BASELINE METHODOLOGY CHANGE

**At a county-by-county level**, our analysis indicates that using a new "Plan Bay Area 2050 *Future Households*" baseline results in extraordinarily inequitable - and hopefully unintended - benefits to primarily one county (Santa Clara) *at the expenses of nearly all others* (Figure A):

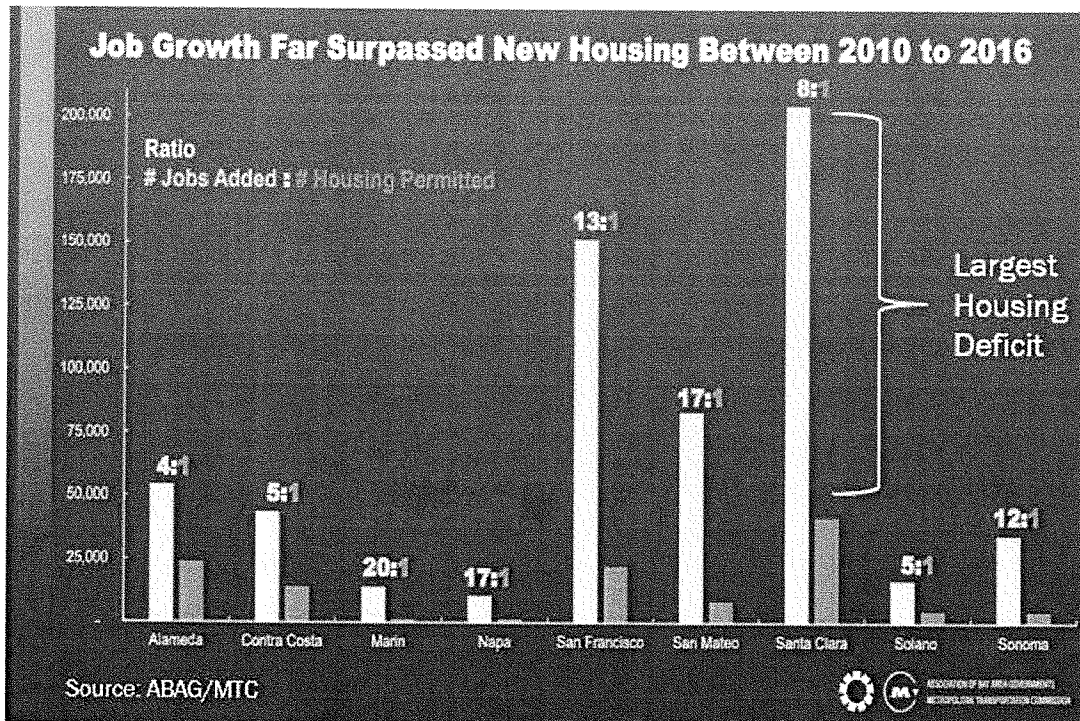
**ATTACHMENT** C

Figure A. Impact of switching to the *Plan Bay Area 2050 Future Households* Baseline



Coincidentally, Santa Clara county is the home to all ten of the San Francisco Bay Area’s largest technology companies including: Apple (188,000 employees), Hewlett Packard (186,000 employees), Google (184,000 employees), Oracle (169,000 employees), Intel (128,000 employees), Cisco (91,000 employees, and Facebook (60,000 employees).

Consequently, it seems counter-intuitive to utilize a baseline that reduces the housing assignment to the subregion that is in greatest need of affordable housing and has the largest existing housing deficit, as illustrated by ABAG’s CASA Compact presentation:



On a **jurisdiction-by-jurisdiction** level, our analysis reveals an even more alarming pattern that the PBA 2050 *Future Households* baseline appears to allocate disproportionately large assignments to small and rural communities while alleviating the responsibility of communities with large job centers (Attachment B). This disparity occurs within the county level, as illustrated in Santa Clara county's numbers.

Sampling of Impacted Jurisdictions	Plan Bay Area 2050 Growth (advocated by CCMC)	Plan Bay Area 2050 Future Households (advanced by HMC)	Difference	% Change
<b>Santa Clara County</b>				
Los Gatos	142	1,430	+1,288	+907%
Monte Sereno	3	140	+137	+4,567%
Mountain View	12,377	7,810	-4,567	-37%
Palo Alto	11,127	6,810	-4,317	-39%
San Jose	100,155	67,240	-32,915	-33%
Santa Clara	14,285	9,630	-4,655	-33%
Sunnyvale	12,025	9,980	-2,045	-17%
<b>Alameda County</b>				
Albany	355	930	+575	+162%
Piedmont	60	430	+370	+617%
Unincorporated	1,638	5,950	+4,312	+263%
<b>Contra Costa County</b>				
Danville	223	1,820	+1,597	+716%
Hercules	411	1,060	+649	+158%
Martinez	311	1,670	+1,359	+437%
Unincorporated	2,588	7,310	+4,722	+182%
<b>Marin County</b>				
Fairfax	215	460	+245	+114%
Mill Valley	27	710	+683	+2530%
San Anselmo	202	670	+468	+232%
<b>San Mateo County</b>				
Atherton	30	280	+250	+833%
Hillsborough	116	470	+354	+305%
Pacifica	199	1,580	+1,381	+694%
Portola Valley	3	200	+197	+6,567%

Solano County				
Benicia	258	1,270	+1,012	+392%
Dixon	209	690	+481	+230%
Rio Vista	84	420	+336	+400%
Suisun City	298	1,070	+772	+259%
Vacaville	1,056	3,650	+2,594	+246%
Vallejo	2,117	5,250	+3,133	+148%
Sonoma County				
Sonoma	184	620	+436	+237%
Unincorporated	6,893	9,080	+2,187	+32%

## RECOMMENDED BASELINE

We understand that the Housing Methodology Committee (HMC) has chosen to present “Option 8A” to the ABAG Executive Board as the *only option* for consideration at your October 15, 2020 meeting. It appears that other compelling options – even as a valid minority report - did not have a chance to advance.

Consequently, we are appreciative of the opportunity to present an alternative - **Modified Option 8A** - to the ABAG Executive Board at its October 15, 2020 meeting. Contra Costa’s alternative (highlighted in green) uses the **Plan Bay Area 2050 Growth** baseline and leaves the HMC-recommended factors in place. A summary of the results for each county is shown below and the effects for all cities is included in Attachment B.

County	Option 8A (2050 Future HH)	Modified 8A (PBA 2050 Growth)	Change	%
Alameda	85,690	79,412	(6,278)	-7%
Contra Costa	43,960	27,890	(16,070)	-37%
Marin	14,210	8,803	(5,407)	-38%
Napa	3,820	1,655	(2,165)	-57%
San Francisco	72,080	57,792	(14,288)	-20%
San Mateo	48,440	45,804	(2,636)	-5%
Santa Clara	143,550	196,746	53,196	37%
Solano	11,920	8,075	(3,845)	-32%
Sonoma	17,520	15,000	(2,520)	-14%

The recommended use of the **Plan Bay Area 2050 Growth** baseline appears to make significantly more intuitive sense for the entirety of the San Francisco Bay Area as it:

- **Encourages housing development in proximity to job centers**, which would
- **Reduce transit and transportation congestion**, helping to alleviate long region wide commutes; and
- **Reduce greenhouse gas emissions**, consistent with both AB 32 and SB 375.

Furthermore, alternative Modified Option 8A is consistent with both the RHNA statutory objectives as it would:

1. Increase housing supply, but in a manner that adds much needed housing near the job centers;
2. Promotes infill development and reinvestment in urban centers that wish to redevelop, thereby promoting socioeconomic equity;
3. Protects the environment, agricultural resources, and wildland hazards by moving development pressure away from the urban edges;
4. Helps the San Francisco Bay Area achieve mandated GHG reduction targets through an improved jobs/housing balance; and lastly
5. Ensures policy consistency with Plan Bay Area 2050 Blueprint by more closely aligning the housing assignment at the major centers.

We appreciate your consideration of our recommendation and perspectives.

Sincerely,

/Signed hard copy to follow via U. S. mail. /

Gabriel Quinto, Conference Chair  
Contra Costa Mayors Conference

Attachment A: Comparison of Baseline Methodologies and Housing Allocation Alternatives – Option 8A (recommended by ABAG HMC) and **Modified Option 8A** (recommended by CCMC)

***Contra Costa Mayors Conference Membership***

- |                           |                              |
|---------------------------|------------------------------|
| <i>City of Antioch</i>    | <i>City of Oakley</i>        |
| <i>City of Brentwood</i>  | <i>City of Orinda</i>        |
| <i>City of Clayton</i>    | <i>City of Pinole</i>        |
| <i>City of Concord</i>    | <i>City of Pittsburg</i>     |
| <i>Town of Danville</i>   | <i>City of Pleasant Hill</i> |
| <i>City of El Cerrito</i> | <i>City of Richmond</i>      |
| <i>City of Hercules</i>   | <i>City of San Pablo</i>     |
| <i>City of Lafayette</i>  | <i>City of San Ramon</i>     |
| <i>City of Martinez</i>   | <i>City of Walnut Creek</i>  |
| <i>Town of Moraga</i>     |                              |

# **ATTACHMENT A**

## **Comparison of Baseline Methodologies and Housing Allocation Alternatives**

Note: All data is sourced from ABAG documents, graphics, and Visualization Tool exports. There are observed minor discrepancies between ABAG sources but at a level that is statistically insignificant to be of concern.

County	Jurisdiction	Population	Step 1: Choose Baseline Methodology		
			2019 Households (Oppose)	PBA 2050 Growth (Support)	PBA 2050 Future Households (Oppose)
Alameda	Alameda	81,312	4,980	3,236	4,311
	Albany	18,937	1,060	355	915
	Berkeley	122,580	7,710	3,952	6,402
	Dublin	65,716	3,480	3,817	3,047
	Emeryville	12,298	1,030	3,230	1,710
	Fremont	234,220	11,870	11,738	11,838
	Hayward	160,311	7,700	3,787	6,113
	Livermore	91,861	5,040	5,407	4,917
	Newark	48,966	2,280	3,365	2,515
	Oakland	433,697	26,280	33,581	28,661
	Piedmont	11,453	630	60	400
	Pleasanton	79,464	4,400	3,749	4,009
	San Leandro	87,930	5,000	2,166	4,000
	Unincorporated Alameda	148,452	7,910	1,638	5,918
	Union City	73,637	3,390	2,574	3,114
County Total:		1,670,834	92,760	82,655	88,212
% of Bay Area Allocation:			21%	19%	2
Contra Costa	Antioch	112,520	5,490	2,869	4,511
	Brentwood	65,118	3,120	2,462	2,772
	Clayton	11,337	650	229	500
	Concord	130,143	7,190	2,654	5,714
	Danville	43,876	2,540	223	1,833
	El Cerrito	24,953	1,680	1,153	1,513
	Hercules	25,530	1,350	411	1,001
	Lafayette	25,604	1,550	831	1,331
	Martinez	37,106	2,350	311	1,611
	Moraga	16,946	910	682	811
	Oakley	42,461	1,930	1,603	1,711
	Orinda	19,009	1,100	368	811
	Pinole	19,505	1,100	535	911
	Pittsburg	74,321	3,420	1,877	2,711
	Pleasant Hill	34,267	2,220	1,116	1,811
	Richmond	111,217	5,890	6,552	6,111
	San Pablo	31,413	1,460	535	1,111
	San Ramon	83,118	4,500	3,179	3,911
Unincorporated Contra Costa	174,257	9,570	2,588	7,311	
Walnut Creek	70,860	5,090	4,564	4,911	
County Total:		1,153,561	63,110	34,742	53,512
% of Bay Area Allocation:			14%	8%	1
Marin	Belvedere	2,124	150	89	110
	Corte Madera	10,114	640	442	611
	Fairfax	7,399	550	215	411
	Larkspur	12,253	980	549	811
	Mill Valley	14,674	1,000	27	711
	Novato	53,702	3,310	2,180	2,911
	Ross	2,550	130	24	111



	San Anselmo	12,757	860	202	6
	San Rafael	59,807	3,710	4,217	3,9
	Sausalito	7,252	680	189	5
	Tiburon	9,540	610	313	5
	Unincorporated Marin	68,659	4,280	2,156	3,9
	County Total:	260,831	16,900	10,603	15,4
	% of Bay Area Allocation:		4%	2%	
Napa	American Canyon	20,837	950	691	8
	Calistoga	5,348	340	510	3
	Napa	79,278	4,640	1,544	3,6
	St. Helena	6,073	409	38	3
	Unincorporated Napa	24,867	1,520	133	1,2
	Yountville	2,500	180	39	1
	County Total:	138,903	8,039	2,955	6,5
	% of Bay Area Allocation:		2%	1%	
San Francisco	San Francisco	897,806	59,160	44,843	67,2
	County Total:	897,806	59,160	44,843	75,5
	% of Bay Area Allocation:		13%	10%	1
San Mateo	Atherton	7,031	370	30	2
	Belmont	26,813	1,730	493	1,3
	Brisbane	4,633	750	9,088	3,2
	Burlingame	30,118	2,020	3,423	2,5
	Colma	1,729	70	337	2
	Daly City	109,142	5,210	3,610	4,5
	East Palo Alto	30,794	1,170	467	9
	Foster City	33,033	2,060	559	1,5
	Half Moon Bay	12,431	720	378	6
	Hillsborough	11,418	620	116	4
	Menlo Park	35,254	2,150	2,326	2,2
	Millbrae	22,832	1,330	2,311	1,6
	Pacifica	38,331	2,250	199	1,5
	Portola Valley	4,607	290	3	2
	Redwood City	86,754	4,830	5,211	4,8
	San Bruno	45,454	2,510	1,661	2,1
	San Carlos	30,145	1,880	798	1,7
	San Mateo	103,087	6,390	4,349	5,9
	South San Francisco	67,879	3,420	5,297	4,0
	Unincorporated San Mateo	66,083	3,470	3,630	3,6
	Woodside	5,676	320	26	2
	County Total:	773,244	43,560	44,312	44,1
	% of Bay Area Allocation:		10%	10%	1
Santa Clara	Campbell	42,288	2,780	4,279	3,2
	Cupertino	59,549	3,250	5,802	4,3
	Gilroy	57,084	2,550	2,310	2,3
	Los Altos	30,876	1,810	904	1,5
	Los Altos Hills	8,413	490	108	3
	Los Gatos	31,439	2,040	142	1,4
	Milpitas	77,961	3,450	9,666	5,4
	Monte Sereno	3,594	220	3	1
	Morgan Hill	46,454	2,330	1,652	1,9

	Mountain View	82,272	5,540	12,377	7,8
	Palo Alto	69,226	4,480	11,127	6,8
	San Jose	1,049,187	52,090	100,155	67,2
	Santa Clara	129,104	7,460	14,285	9,6
	Saratoga	31,030	1,760	917	1,5
	Sunnyvale	156,503	9,290	12,025	9,9
	Unincorporated Santa Clara	86,989	4,310	4,836	4,7
County Total:		1,961,969	103,850	180,588	128,4
% of Bay Area Allocation:			24%	41%	2
Solano	Benicia	27,175	1,730	258	1,2
	Dixon	19,972	1,000	209	6
	Fairfield	116,981	6,050	7,596	6,3
	Rio Vista	9,987	700	84	4
	Suisun City	29,119	1,480	298	1,0
	Unincorporated Solano	19,072	1,100	2,819	1,8
	Vacaville	98,855	5,370	1,056	3,6
	Vallejo	119,063	6,600	2,117	5,2
County Total:		440,224	24,030	14,437	20,5
% of Bay Area Allocation:			5%	3%	
Sonoma	Cloverdale	9,213	350	528	5
	Cotati	7,533	500	399	4
	Healdsburg	12,089	750	451	6
	Petaluma	61,873	3,650	3,116	3,4
	Rohnert Park	43,069	2,650	1,453	2,1
	Santa Rosa	173,628	540	11,159	10,6
	Sebastopol	7,745	830	1,076	7
	Sonoma	11,050	8,750	184	6
	Unincorporated Sonoma	138,532	1,480	6,893	9,0
	Windsor	28,248	334	784	1,2
County Total:		492,980	19,834	26,043	29,5
% of Bay Area Allocation:			4%	6%	

# Tri-Valley Cities

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September 14, 2020

Mayor Jesse Arreguín, Chair  
Housing Methodology Committee  
Association of Bay Area Governments  
375 Beale Street, Suite 700  
San Francisco, CA 94105-2066

Dear Chair Arreguín:

On behalf of the Tri-Valley cities of Danville, Dublin, Livermore, Pleasanton, and San Ramon, we are writing to express our concern about the methodology options that will be considered by the Housing Methodology Committee on September 18.

The Tri-Valley Cities (TVC) appreciate the urgency of the statewide housing crisis and the responsibility of local jurisdictions to address this important issue. Each of our five cities has taken significant steps over recent years to facilitate the construction of both market-rate and affordable housing – evidenced by the construction of more than 10,300 new housing units since the start of the last Housing Element cycle – these efforts have made the Tri-Valley one of the fastest-growing regions in the Bay Area and the State. Through dedicated affordable housing projects, application of inclusionary ordinances, and policies to encourage ADUs, we have also made progress towards fulfilling our affordable housing needs, although, as has been experienced by most cities, the lack of funding for lower-income housing continues to present a significant challenge.

We very much appreciate the efforts and dedication of the HMC in addressing the significant challenges presented by the upcoming 6<sup>th</sup> Cycle RHNA process. Although we commend the HMC's prior decision to utilize the Plan Bay Area 2050 Households Baseline in the methodology, we would urge reconsideration of the currently proposed methodologies and factors, in order to more appropriately balance the RHNA Statutory Objectives identified in State Law including equity and fair housing goals, as well as those related to efficient growth patterns and GHG reductions.

Methodology options 5A and 6A that will be under consideration by the HMC on September 18, have significant flaws. In particular, both place a disproportionate emphasis on factors that allocate RHNA to high opportunity areas, without consideration of the negative consequences of the resultant land use patterns. The following points reflect our specific concerns regarding the proposed methodology options:

- The options do not adequately address factors related to transit and jobs proximity, and fail to take into account the lack of high-quality transit within the Tri-Valley, and distance from the major employment centers of the South Bay, Oakland, and San Francisco. The methodologies allocate growth in a manner that will promote auto dependency and longer commute times, exacerbate GHG impacts, and run counter to the goals and objectives well-formulated and strongly articulated in the recently released Plan Bay



# Tri-Valley Cities

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Area Blueprint. This is also counter to RHNA Statutory Objective 2: Promoting infill development and socioeconomic equity, the protection of environmental and agricultural resources, and the encouragement of efficient development patterns.

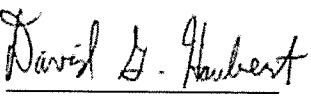
- The options push significant housing allocations into the outer ring of Bay Area suburbs, including the Tri-Valley, exacerbating the jobs/housing imbalance, and compelling long commutes to distant jobs centers. Even in our relatively jobs-rich Tri-Valley cities, data shows that many of our residents, today, commute significant distances to work. This comes at a significant cost: not just in negative environmental consequences, but as time spent away from families, and a further strain on household finances, particularly for lower-income households.
- Our smaller cities have limited land area and sites that are candidates for re-zoning. Significant RHNA allocations may have the unintended consequence of causing speculative increases in land values, and create pressure to develop agricultural and open space lands, areas subject to natural hazards, and other sensitive resources.

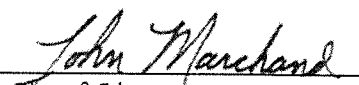
Given these concerns, we would urge the Committee to reject the current options 5A and 6A, and consider methodology options that emphasize factors and factor weightings that 1) focus housing allocations in areas most proximate to the highest concentrations of jobs, and particularly where jobs growth has outpaced recent housing production (e.g jobs proximity factors); 2) provide realistic allocations that take account of geographic and other constraints to housing development (e.g. urbanized land area factors); and 3) provide residents with access to viable transit and transportation options that do not add to regional congestion, commute times, and household transportation costs (e.g. transit proximity factors).

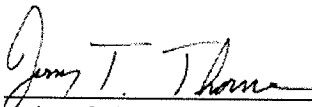
Thank you for your consideration of these important concerns.

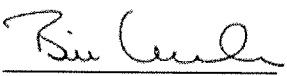
Respectfully,

  
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

