

(Draft)

October 7, 2020

Mayor Jesse Arreguin, President
Association of Bay Area Governments, Executive Board
375 Beale Street, Suite 700
San Francisco, CA 94105-2066

Dear Board President Arreguin:

On behalf of the Town Council of Fairfax, please accept our comments related to the proposed Regional Housing Needs Allocation (RHNA) methodology recommended by the RHNA Housing Methodology Committee (HMC). Please consider these comments in advance of the October 15, 2020 ABAG Executive Board meeting where the recommended methodology will be discussed.

The Town of Fairfax is aware and appreciative of the efforts and dedication of the HMC stakeholder group over the last year in attempting to recommend an appropriate distribution of 441,000 new housing units assigned to the region by the State Department of Housing and Community Development (HCD). Our Town understands both the challenges and urgent need to address State and regional policy goals pertaining to housing affordability, climate change and equity in the upcoming 6th Regional Housing Needs Assessment (RHNA) cycle.

Unfortunately, however, there are a number of problems with the methodology recommended by the HMC for allocating new housing units to Fairfax. Our Town lacks adequate transportation infrastructure and public transportation services. Marin is projected to actually naturally decrease in population in the next decade as its residents continue to age. The County as a whole, and Fairfax in particular being located at the far end of Marin's urbanized area, is removed from existing and future job centers. Fairfax is in an area of relatively high fire risk even compared to nearby jurisdictions. The Town's position in the far end of Marin's urbanized area further means that evacuation in the event of a wildland fires such as those the State continues to experience is particularly problematic. Marin Municipal Water District's Water Plan for the Marin jurisdictions it serves (including Fairfax) states that there is a chronic water shortage. Finally, there is virtually no vacant land in Fairfax available for large-scale development.

Despite these inherent limiting factors, the preliminary housing numbers shown for Fairfax would be equivalent to the prior five decades' worth of housing development.

The recommended methodology and resulting RHNA numbers, if indeed intended to set realistic quotas for housing growth regionally, will not only fail to meet the Bay Area's total regional housing need, but will threaten our region's ability to grow sustainably into the future.

Other similarly situated cities in Marin and the region are expected to grow at similarly high relative growth rates, despite Plan Bay Area 2050 projections to the contrary. The result is to push a greater proportion of new development into areas that will further increase 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 Area Blueprint.

To avoid these outcomes, we recommend consideration of one or both of the following changes to the recommended methodology:

- 1) Utilize Plan Bay Area 2050 household (HH) growth rates between 2019 and 2050 as the baseline for the RHNA allocation rather than Plan Bay Area HH in 2050.

Utilizing the PBA 2050 household growth rate as the baseline will align RHNA more closely with Plan Bay Area Blueprint objectives and focus a greater proportion of growth to areas where transportation investments, job growth, and beneficial market conditions are expected to be focused.

- 2) Reduce the 40% allocation factor to High Resource Areas for moderate and market rate units utilized in Recommended Option 8A

While not clear from the presentation materials provided to the HMC, it appears that the 70% allocation factor for very low and low-income units, and the 40% allocation factor for moderate and market rate units, are driving significant additional units to High Resource Areas, such as Fairfax, beyond that anticipated in Plan Bay Area 2050. It is not clear how the 40% allocation factor for moderate and market rate units helps further the equity purpose the HMC intends, as it would appear to drive relatively more higher income households to High Resource Areas. Reducing or eliminating this allocation factor would presumably reduce the overall housing allocation to jurisdictions like Fairfax without affecting the strategy the HMC proposes to introduce greater equity into the RHNA process.

While we again recognize the challenge that the HMC faced in developing an appropriate allocation methodology, and appreciate many of the thoughtful contributions they have introduced into the process, we believe the outcomes of the recommended methodology, unless modified, would be inconsistent with Plan Bay Area 2050 objectives to grow the Bay Area sustainably and allocate scarce resources efficiently.

Fairfax is one of the few Bay Area jurisdictions that has met and even exceeded its low income housing allocation in the current 5th Cycle RHNA. Our Town believes it can continue to thoughtfully craft housing policies that will support housing that both helps to address the region's housing supply, affordability, and equity issues, and meets the needs of our Town. Without modification however, the recommended HMC methodology presents wholly unrealistic housing quotas over the 2023-2031 RHNA cycle which appear to simply be a punitive attempt to set higher resource communities up for failure and state-imposed land use controls and penalties.

With appreciation for your Bay Area regional work, we thank you for your time and consideration.

Sincerely,

Renee Goddard

Mayor, Town of Fairfax