

# MEMO

**To:** ABAG Executive Board  
**From:** Alex Amoroso, Senior Planner  
**Date:** 3/15/01  
**Subject:** Finalizing the Regional Housing Needs Determination (RHND) Allocations  
**Appeals Review and Certification**

## Background/Introduction

The Executive Board, Housing Methodology Committee (HMC) and ABAG staff have been working for two years to develop a program for, and complete the distribution of, the RHND allocations to all jurisdictions in the Bay Area. The most recent steps include:

- The State mandated 90-day review and comment period ended August 31, 2000. Staff has responded to all requests for information and modifications. Additionally, staff met with several jurisdictions that requested meetings. As of October 31, 2000, 69 jurisdictions (total from the releases of allocations) requested information or modifications to their allocations.
- At their November 16, 2000 meeting, the Board adopted a final set of RHND allocations. This initiated the appeal process.
- On January 25, the Board appointed Appeals Committee heard and decided ten appeals.

The Appeals Committee actions are the focus of this report and the March 15, 2001 Board presentation.

At the March 15, 2001 ABAG Executive Board meeting, staff is requesting that the Board take the following actions:

- Review and accept the Appeals Committee decisions regarding the ten appeals
- Adjust the allocations adopted on November 16, 2000 to reflect the Appeals Committee's decision
- Direct staff to notify all jurisdictions of the Board's action, and present each jurisdiction with their allocation as certified by the Board.
- Adopt a resolution to forward the ABAG RHND allocations to the Department of Housing and Community Development.

## **Major Issues Summary**

This section of the report outlines the major issues identified throughout the comment and the appeals process. These comments typically fit within one of the major subject headings that follow, and are similar to those reviewed at the November 2000 Board meeting. At that meeting, the Board affirmed their direction to staff regarding how each issue should be addressed.

Comments, which are specific to each jurisdiction's appeal, have not been addressed in this section, but are available as **Attachment A**. Response to comments on these issues is based upon direction from the Board given at Executive Board meetings, input from HCD, and ongoing discussions at the staff level. Staff has maintained a consistency in response to comments, and the consistent response has been identified at the end of each major issue.

### Data sources and the Methodology

At the appeals hearings, several jurisdictions raised the issue of the availability and accuracy of data used in the methodology. These comments ranged from pointing out ABAG Projections flaws to the jurisdictions having access to better sources of data.

The data sources used in the methodology were chosen because of their availability, and their regional applicability among other reasons. While some jurisdictions claim to have more accurate information at the local level, the use of local level data would have the affect of treating jurisdictions differently in the context of the regional allocation process.

As previously defined by the Board, the Appeals Committee applied the test of regional applicability of data. Those jurisdictions that used other data sources to request revisions of their allocations were denied, because the same data resources were not available at a regional level. ABAG staff has contacted the Department of Housing and Community Development (HCD) to confirm our test of regionally available data. HCD has agreed with the ABAG interpretation.

In addition to the availability of regional data issue, three of the appealing jurisdictions noted potential inaccuracies in ABAG Projections. Attachment A reflects the discussion and decisions related to each of those jurisdictions. It is important to note that all jurisdictions have the opportunity to review draft Projections numbers prior to the release of the document, and that inputs to the Projections model are gathered through discussions with jurisdictions. The each alleged inaccuracy is open to interpretation. To provide consistent treatment throughout the RHND process, staff has relied upon the data available from the Projections background materials.

### Regulatory Constraints

Some of the appealing jurisdictions identified regulatory constraints including:

- slow growth and other numerical growth limiting regulations
- urban growth boundaries (UGBs)
- lack of existing sites with general plan and zoning regulations to accommodate housing

These constraints are not recognized by the State in the RHND process, and therefore cannot be taken into account as a reason to reduce allocations.

### General Comments

During the appeal process, a number of comments arose with regularity. These include:

- the State regional needs allocation process is in need of revision
- the use of DOF and Projections databases affects the methodology and allocations

The database related comments will be taken into account by staff in future RHND processes, during the time that the methodology is developed. Additionally, ABAG recognizes that legislative issues must be addressed with the State and has undertaken a review of this and other issues related to the RHND process.

### **Specific Allocation Modifications**

City of Alameda:

The City of Alameda has requested a reduction in its RHND allocation. This request for reduction is based on the argument that Alameda suffered a substantial job loss as a result of base closure in the early 1990s. The closure of the base caused a significant loss of civilian jobs. The City contends that their attempt to recover jobs, and the resulting increase in allocations is not “fair share” in the regional context. The City suggests that they should be able to increase jobs to regain their job base, without being penalized in the form of RHND allocations.

The Appeals Committee evaluated the City of Alameda case and determined that it was unique in the Bay Area. The City of Alameda lost almost 40% of its jobs as a result of the base closure, and no other jurisdiction in the region has experienced a one-time loss of such magnitude. Recognizing this fact, but still being cognizant of the need for Bay Area housing, the Appeals Committee is recommending a reduction of 441 units from the City of Alameda allocation. This would reduce the overall allocation for the City from 2,162 to 1,721 RHND allocations.

The reduction in allocations is contingent upon approval of the reduction by HCD. Staff believes that a reduction of this size is “consistent with the regional and statewide allocation”. Furthermore, the Appeals Committee has stated that the job loss suffered by City of Alameda is unique in the ABAG region.

City of Richmond:

The City of Richmond requested that their allocations be reduced, and that the City’s responsibility for allocations in the lower income categories also be reduced. The City contends that, due to high unemployment rates, the overall allocation should be reduced. The City’s request for a shift in units between income categories is based upon its disproportionately high number of lower income households when compared with the rest of Contra Costa County.

The Appeals Committee evaluated the City of Richmond request and determined the City's request for overall reduction of allocations due to high unemployment rates does not reflect the intent of the regional allocation methodology.

However, the City is unique to Contra Costa County and the region, in that it has historically provided homes for disproportionately high numbers of lower income households. Therefore a portion of the allocations of units in the lower income levels should be shifted to the above moderate allocation.

The Appeals Committee is recommending that 288 units of the City of Richmond allocations be shifted from the very low, low and moderate-income categories into the above moderate category. This reallocation of units would not reduce the overall RHND allocation for Richmond. It would shift units, allowing the city to enhance its above moderate housing stock.

The Appeals Committee recommends no other modifications. The Committee has stated that the two presented modifications represent the only unique situations discovered in the appeals process, and therefore should be the only two modifications made to the RHND allocations approved by the Executive Board in November, 2000.

### **Recommended Allocations**

**Attachment B** is the set of RHND allocations for the ABAG region. The only modifications made in the allocations are those referred to for the City of Alameda and the City of Richmond. **This set of allocations reflects the Appeals Committee decisions.**

### **Next Steps**

Assuming that the Board accepts the Appeals Committee decisions, and adopts the resolution:

- ABAG will forward the final allocations to HCD for review and acceptance.
- ABAG will notify all jurisdictions of their final allocations.
- Staff will prepare the final RHND report to be delivered to the Board in May.

### **Recommended Actions**

**Staff recommends the following:**

- **Review and accept the Appeals Committee decisions regarding the ten appeals.**
- **Adjust the allocations for the cities of Richmond and Alameda to reflect the Appeals Committee's decisions.**
- **Direct staff to notify all jurisdictions of the Board's action, and present each jurisdiction with their allocation as certified by the Board.**
- **Adopt the attached resolution 07-01 forwarding the ABAG RHND allocations to HCD.**

## **Regional Housing Needs Determination Appeal Resolutions**

Appeal Hearing Date: January 25, 2001

### **Summary of Appeal Committee Actions**

#### **1. City of Richmond- RHND Allocation Modified**

##### **Revision Request**

The appeal by the City of Richmond contained two proposed revisions.

**Proposed Revision 1.** The City of Richmond requested that ABAG reduce its RHND allocation an undetermined amount by taking into consideration the City's high rate of unemployment.

##### **Resolution**

**Proposed Revision 1.** The Appeal Committee denied the City of Richmond's request to reduce the City's RHND allocations by modifying the RHND methodology in a manner that would consider the City's high rate of unemployment.

##### **Reasoning**

The appeal to reduce the City's RHND allocations is not consistent with the requirements of State Housing Element Law, nor the additional appeal criteria stipulated by the Executive Board, which would warrant a revision.

- The proposed revision is inconsistent with the goals of the RHND process. The RHND methodology allocates housing units to jurisdictions based upon both household growth as well as job growth. Jurisdictions that are planning additional job growth receive an RHND allocation commensurate with that job growth.
- The proposed revision is not based upon acceptable data that is available, accurate, current and replicable at the region level.
- The City of Richmond has not identified another recipient (other jurisdiction(s)) willing to incorporate the proposed reduction in RHND allocations.

##### **Revision Request**

**Proposed Revision 2.** The City also requested that its income distribution allocation be reduced in the lower income categories based upon the City's current housing stock, which already contains high numbers of lower income households.

##### **Resolution**

**Proposed Revision 2.** The Appeal Committee approved the City of Richmond's request to redistribute the RHND allocations among income category distribution. Staff recommended applying the Contra Costa countywide income averages to the RHND allocation for the City of Richmond. This revision shifts 288 units from the very low, low, and moderate income categories into the above moderate category, while maintaining the overall RHND allocation of 2,603 units assigned by ABAG.

## Reasoning

When a comparison is drawn between the combined very-low and low income percentages of the City of Richmond and the other jurisdictions within Contra Costa county, the City of Richmond is found to have a disproportionately higher number of lower income households than other jurisdictions throughout Contra Costa county. This condition is perpetuated by the income distribution method applied by the RHND methodology. State Housing Element law indicates that the RHND methodology should seek to reduce over-concentration of lower income households in its distribution of the RHND allocations. The City of Richmond has a uniquely higher percentage of lower income households compared with the other jurisdictions in Contra Costa County.

In order to address this issue, staff recommended applying the Contra Costa countywide income percentages to the City of Richmond's RHND allocation. The resolution would move the City of Richmond's lower income housing stock closer to the other jurisdictions within Contra Costa County.

**Table I. Revised RHND Allocation by Income Category**

Income Category	City of Richmond		Contra Costa County	City of Richmond	
	Percentage	Allocation	Percentage	Revised RHND Allocation	Difference
Above Moderate	36.3%	946	47.4%	1,234	+ 288
Moderate	25.7%	670	24%	625	-45
Low	12.1%	314	10.5%	273	-41
Very Low	25.9%	673	18.1%	471	-202

## 2. City of Piedmont- Appeal Denied

### Revision Request

The City of Piedmont requested that ABAG reduce the City's job growth in the RHND methodology from 136 jobs to 84 jobs, and the household growth from 19 households to 14. This request is based upon alleged inaccuracies in the Projections 2000 forecast claimed by the City of Piedmont. This requested modification would have the effect of reducing the City's RHND allocation from 49 units to 32 units.

### Resolution

The Appeal Committee denied the City of Piedmont's request to modify the RHND methodology by reducing the household and job growth in the RHND methodology.

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## **Reasoning**

The appeal does not meet the requirements of State Housing Element Law, nor the additional appeal conditions stipulated by the Executive Board, which would warrant a revision.

- The City of Piedmont cites alleged inaccuracies in the Projections 2000 forecast as the determining factor for an overstatement of the City's RHND allocation. Jurisdictions are given several opportunities to review and modify, if necessary, their Projections growth forecasts prior to ABAG release of the data. The City of Piedmont did review its Projections 2000 forecast, however no modification was proposed to the City's employment estimates. The data used in the ABAG methodology (Projections 2000) to determine the RHND allocations was therefore considered valid, and was used to determine the RHND allocation for the City of Piedmont.
- The proposed revision is not supported by adequate documentation. The City of Piedmont conducted an employment survey of its businesses in an effort to determine the number of employed persons working within the City. The City maintains that its employment survey should be considered as alternative data that can be used to revise the City's RHND allocations. Housing Element Law states that acceptable data must be considered if it is (1) Available; generally accessible to the public, (2) Accurate; reasonably free from defect and developed in accordance with an established methodology having produced reliable estimates over time, (3) Current and (4) Replicable; data which can be used on a region-wide basis.
- The employment survey submitted by the City of Piedmont does not meet all of the above criteria. It cannot be reproduced at the regional scale, representing a housing market area larger than a single jurisdiction.
- The City of Piedmont has not identified another recipient (other jurisdiction(s)) willing to incorporate the proposed reduction in RHND allocations.

### **3. City of Rohnert Park- Appeal Denied**

#### **Revision Request**

The City of Rohnert Park requested that its RHND allocation be reduced from 2,124 units to 621 units (a reduction of 1,503 units). The requested revision is based upon alleged inaccuracies in the Projections 2000 forecasts, which the City states is an overestimation of growth during the RHND planning time frame. The City of Rohnert Park contends that ABAG staff did not remove a record, marked for deletion in the Local Policy Survey database. At the City's request, the record was amended to show increased residential density prior to the release of Projections 2000.

#### **Resolution**

The Appeal Committee denied the City of Rohnert Park's request to reduce the City's RHND allocation.

#### **Reasoning**

The appeal does not meet the requirements of State Housing Element Law, nor the additional appeal conditions stipulated by the Executive Board, which would warrant a revision.

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- The City of Rohnert Park cites alleged inaccuracies in the Projections 2000 forecast for households as the determining factor for an overstatement of the City's RHND allocation. Jurisdictions are given several opportunities to review and modify, if necessary, their Projections growth forecasts prior to ABAG's release of the data. The City of Rohnert Park did not update its local policy survey database prior to the release of the preliminary Projections 2000 forecast, nor did it submit comments to ABAG during the review of the preliminary Projections 2000 forecast, that suggested the household growth forecasts were inaccurate. The data used by ABAG to determine the RHND allocations was considered valid, and was used to determine the RHND allocation for the City of Rohnert Park.
- The RHND allocations for the City of Rohnert Park are not significantly impacted by the amount of household growth applied in the RHND methodology. The RHND methodology considers each jurisdiction's share of regional job growth and household growth in determining the allocations. The City of Rohnert Park is planning to add 563 households (a 0.32% share of regional household growth) during the RHND timeframe, whereas the City's job growth will be 4,016- nearly 1% of the region's job growth. This level of job growth significantly increases the RHND allocations for the City of Rohnert Park.
- The City of Rohnert Park has not identified another recipient (other jurisdiction(s)) willing to incorporate the proposed reduction in RHND allocations.

#### **4. City of Saratoga- Appeal Denied**

##### **Revision Request**

The City of Saratoga requests that ABAG recalculate the RHND allocation based upon past housing unit production trends and proposed revisions to Projections 2000 job forecasts. Based upon a revised RHND calculation provided by the City, the proposed revision would reduce the RHND allocation assignment of 539 units to a proposed total of 223 units over the 1999-2006 RHND time frame.

##### **Resolution**

The Appeal Committee denied the City of Saratoga's request to reduce the City's RHND allocation.

##### **Reasoning**

This appeal does not meet the requirements of State Housing Element Law, nor the additional appeal conditions stipulated by the Executive Board, which would warrant a revision.

- The City of Saratoga cites alleged inaccuracies in the Projections 2000 forecast as the determining factor for an overstatement of the City's RHND allocation. Jurisdictions are given several opportunities to review and modify, if necessary, their Projections growth forecasts prior to ABAG release of the data. The City of Saratoga did not submit comments to ABAG during the review of the preliminary Projections 2000 forecast. The data used by ABAG to determine the RHND allocations was considered valid, and was used to determine the RHND allocation for the City of Saratoga.
- The City of Saratoga has not identified another recipient (other jurisdiction(s)) willing to incorporate the proposed reduction in RHND allocations.

## 5. County of Solano- Appeal Denied

### Revision Request

The appeal by the County of Solano contains two proposed revisions.

**Proposed Revision 1.** The County of Solano seeks to modify the RHND methodology by substituting the DOF E-5 report estimate of households with a calculated figure based upon ABAG's forecast of households between 1995 and 2000. The County maintains that this figure underestimates the current housing stock in the unincorporated areas. This would reduce the household growth forecast for unincorporated Solano County, and the subsequent RHND allocations associated with this share of household growth.

**Proposed Revision 2.** The County also seeks to modify the RHND methodology by shifting its 25% share of the RHND allocation assignment for the unincorporated SOI to each incorporated jurisdiction within Solano County.

### Resolution

The Appeal Committee denied Solano County's request to reduce the County's RHND allocation.

### Reasoning

The appeal does not meet the requirements of State Housing Element Law, nor the additional appeal criteria stipulated by the Executive Board, which would warrant a revision.

- **Proposed Revision 1.** Jurisdictions which are adversely impacted by this proposed revision could appeal based upon the same criteria as Solano County. This could result in a cycle of RHND appeals with no foreseeable conclusion. The RHND methodology should be maintained, so that revisions of this type do not create appeals which are based upon the same reasoning as the proposed revision. Proposed revisions must be based on the same accepted methodology that determined the RHND allocations.
- **Proposed revision 2.** The Executive Board issued a policy directive to divide the RHND allocations for the unincorporated SOI areas amongst the cities and counties in the region. The proposed revision does not comply with this directive. All revisions must be based upon the same accepted planning methodology that produced the RHND allocations.
- Solano County has not identified another recipient (other jurisdiction(s)) willing to incorporate the proposed reduction in RHND allocations.

## 6. Town of Windsor- Appeal Denied

### Revision Request

The Town of Windsor requests that the RHND allocation be revised to 170 units per year (a total of 1,275 units) over the 1999-2006 RHND time frame, in recognition of the Town's General Plan and Growth Control goals.

### Resolution:

The Appeal Committee denied the Town of Windsor's request to reduce the Town's RHND allocation.

### Reasoning

The appeal does not meet the requirements of State Housing Element Law, nor the additional appeal criteria stipulated by the Executive Board, which would warrant a revision.

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- State Housing Element Law does not recognize local growth control measures as a valid means of reducing RHND allocations.
- The Town of Windsor has not identified another recipient (other jurisdiction(s)) willing to incorporate the proposed reduction in RHND allocations.

## **7. County of Sonoma- Appeal Denied**

### **Revision Request**

Sonoma County requests that ABAG and HCD resume negotiations over the total regional “goal” number, with the intent that the regional number be reduced to match the corresponding housing unit forecast as contained in the *Projections 2000* report. This would reduce the County’s RHND allocation by 3,676 units.

### **Resolution**

The Appeal Committee denied the County of Sonoma's request to reduce the County's RHND allocation.

### **Reasoning**

The appeal does not meet the requirements of State Housing Element Law, nor the additional appeal conditions stipulated by the Executive Board, which would warrant a revision.

- The issues identified by the County of Sonoma are procedural, and therefore are not considered valid points of appeal.
- State Housing Element Law does not recognize local growth control measures as a valid means of reducing RHND allocations.
- The County of Sonoma has not identified another recipient (other jurisdiction(s)) willing to incorporate the proposed reduction in RHND allocations.

## **8. City of Gilroy- Appeal Denied**

### **Revision Request**

The appeal by the City of Gilroy contains two proposed revisions.

**Proposed Revision 1.** The City of Gilroy seeks to recalculate the RHND allocations based upon an alternate methodology that considers LAFCO Urban Service Area policies, and other criteria that could be used in the methodology to reduce sprawl. Using the City's alternate methodology would reduce the RHND allocation from 3,746 units to 2,800 units, (a reduction of 946 units) for the 1999-2006 RHND time frame.

**Proposed Revision 2.** The City of Gilroy also requests that the distribution of allocations by income category be modified so that the very low and low-income units be more evenly distributed among the cities in Santa Clara County.

### **Resolution**

The Appeal Committee denied the City of Gilroy's request to reduce the City's RHND allocation, and to modify the distribution by income category in order to more evenly distribute the lower income units amongst the cities in Santa Clara County.

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## **Reasoning**

The appeal does not meet the requirements of State Housing Element Law, nor the additional appeal conditions stipulated by the Executive Board, which would warrant a revision.

- The City of Gilroy requests that ABAG incorporate additional factors in the methodology to determine the City's RHND allocations. All revisions must be based upon the same accepted planning methodology that produced the RHND allocations.
- State Housing Element Law does not recognize local growth control measures as a valid means of reducing RHND allocations.
- The proposed revision is not based upon acceptable data that is available, accurate, current and replicable across the entire region. The urban service area policies are very different among the 9 county bay area LAFCO agencies, and therefore not directly applicable across the region.
- The City of Gilroy has not identified another recipient (other jurisdiction(s)) willing to incorporate the proposed reduction in RHND allocations.

## **9. County of Santa Clara- Appeal Denied**

### **Revision Request**

Santa Clara County requests that the RHND allocation for the Unincorporated County be reduced from 1,446 units to 474 units. The appeal is based upon the County's policies that focus growth in the incorporated jurisdictions while limiting growth in the unincorporated areas of the County.

### **Resolution**

The Appeal Committee denied the County of Santa Clara's request to reduce the County's RHND allocation.

### **Reasoning**

The appeal does not meet the requirements of State Housing Element Law, nor the additional appeal conditions stipulated by the Executive Board, which would warrant a revision.

- State Housing Element Law does not recognize local growth control measures as a valid means of reducing RHND allocations.
- The County of Santa Clara has not identified another recipient (other jurisdiction(s)) willing to incorporate the proposed reduction in RHND allocations.

## **10. City of Alameda- RHND Allocation Modified**

### **Revision Request**

The City of Alameda requested that ABAG reduce the City's job growth in the RHND methodology from 5,342 jobs to 2,150 jobs, in recognition of the significant job loss the City suffered as a result of the military base closure at Alameda Point Naval Air Station. The result of this modification would reduce the City's RHND allocation by 882 units.

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## **Resolution**

The Appeal Committee reduced the City of Alameda's RHND allocation from 2,162 units to 1,721 units, a reduction of 441 units. The revision is contingent upon HCD's acceptance of this reduction.

## **Reasoning**

The resolution is based upon the following factors:

- The one time loss of approximately 36% of the City of Alameda's total jobs in 1990 has had an adverse impact on the City's jobs/household ratio. This significant level of job loss is unusual, and unique in the context of the region. No other jurisdiction in the region has suffered a job loss of this magnitude.
- The job growth that the City of Alameda is planning during the 1999-2006 RHND timeframe will replace some of the jobs that were lost as a result of the base closure. Because of the importance that the Executive Board has placed on jobs/ housing balance in the RHND methodology, The Appeal Committee believes that the City of Alameda should not receive an RHND allocation that will cause a further decline in the City of Alameda's jobs/household balance.
- The Appeal Committee believes that this action recognizes the goals of State Housing Element Law.

Table 1.  
Total Housing Need by Income Category  
Alameda County and Cities

Jurisdiction	RHND Allocation	Very Low	Low	Moderate	Above Moderate
ALAMEDA	1,721	353	211	486	671
ALBANY	277	64	33	77	103
BERKELEY	1,269	354	150	310	455
DUBLIN	5,436	796	531	1,441	2,668
EMERYVILLE	777	178	95	226	278
FREMONT	6,708	1,079	636	1,814	3,179
HAYWARD	2,835	625	344	834	1,032
LIVERMORE	5,107	875	482	1,403	2,347
NEWARK	1,250	205	111	347	587
OAKLAND	7,733	2,238	969	1,959	2,567
PIEDMONT	49	6	4	10	29
PLEASANTON	5,059	729	455	1,239	2,636
SAN LEANDRO	870	195	107	251	317
UNION CITY	1,951	338	189	559	865
UNINCORPORATED	5,310	1,785	767	1,395	1,363
<b>Total</b>	<b>46,352</b>	<b>9,820</b>	<b>5,084</b>	<b>12,351</b>	<b>19,097</b>

Shaded area indicates a revision. See Attachment A.

Table 2.  
Total Housing Need by Income Category  
Contra Costa County and Cities

Jurisdiction	RHND Allocation	Very Low	Low	Moderate	Above Moderate
ANTIOCH	4,459	921	509	1,156	1,873
BRENTWOOD	4,073	906	476	958	1,733
CLAYTON	446	55	33	84	274
CONCORD	2,319	453	273	606	987
DANVILLE	1,110	140	88	216	666
EL CERRITO	185	37	23	48	77
HERCULES	792	101	62	195	434
LAFAYETTE	194	30	17	42	105
MARTINEZ	1,341	248	139	341	613
MORAGA	214	32	17	45	120
OAKLEY	1,208	209	125	321	553
ORINDA	221	31	18	43	129
PINOLE	288	48	35	74	131
PITTSBURG	2,513	534	296	696	987
PLEASANT HILL	714	129	79	175	331
RICHMOND	2,603	471	273	625	1,234
SAN PABLO	494	147	69	123	155
SAN RAMON	4,447	599	372	984	2,492
WALNUT CREEK	1,653	289	195	418	751
UNINCORPORATED	5,436	1,101	642	1,401	2,292
<b>Total</b>	<b>34,710</b>	<b>6,481</b>	<b>3,741</b>	<b>8,551</b>	<b>15,937</b>

Shaded area indicates a revision. See Attachment A.

Table 3.  
Total Housing Need by Income Category  
Marin County and Cities

Jurisdiction	RHND Allocation	Very Low	Low	Moderate	Above Moderate
BELVEDERE	10	1	1	2	6
CORTE MADERA	179	29	17	46	87
FAIRFAX	64	12	7	19	26
LARKSPUR	303	56	29	85	133
MILL VALLEY	225	40	21	56	108
NOVATO	2,582	476	242	734	1,130
ROSS	21	3	2	5	11
SAN ANSELMO	149	32	13	39	65
SAN RAFAEL	2,090	445	207	562	876
SAUSALITO	207	36	17	50	104
TIBURON	164	26	14	32	92
UNINCORPORATED	521	85	48	96	292
<b>Total</b>	<b>6,515</b>	<b>1,241</b>	<b>618</b>	<b>1,726</b>	<b>2,930</b>

Table 4.  
Total Housing Need by Income Category  
San Francisco City and County

Jurisdiction	RHND Allocation	Very Low	Low	Moderate	Above Moderate
<b>SAN FRANCISCO</b>	<b>20,372</b>	<b>5,244</b>	<b>2,126</b>	<b>5,639</b>	<b>7,363</b>

Table 5.  
Total Housing Need by Income Category  
Napa County and Cities

Jurisdiction	RHND Allocation	Very Low	Low	Moderate	Above Moderate
AMERICAN CANYON	1,323	230	181	353	559
CALISTOGA	173	44	31	41	57
NAPA	3,369	703	500	859	1,307
ST. HELENA	142	31	20	36	55
YOUNTVILLE	87	21	15	20	31
UNINCORPORATED	1,969	405	272	466	826
<b>Total</b>	<b>7,063</b>	<b>1,434</b>	<b>1,019</b>	<b>1,775</b>	<b>2,835</b>

Table 6.  
Total Housing Need by Income Category  
San Mateo County and Cities

Jurisdiction	RHND Allocation	Very Low	Low	Moderate	Above Moderate
ATHERTON	166	22	10	27	107
BELMONT	317	57	30	80	150
BRISBANE	426	107	43	112	164
BURLINGAME	565	110	56	157	242
COLMA	74	17	8	21	28
DALY CITY	1,391	282	139	392	578
EAST PALO ALTO	1,282	358	148	349	427
FOSTER CITY	690	96	53	166	375
HALF MOON BAY	458	86	42	104	226
HILLSBOROUGH	84	11	5	14	54
MENLO PARK	982	184	90	245	463
MILLBRAE	343	67	32	90	154
PACIFICA	666	120	60	181	305
PORTOLA VALLEY	82	13	5	13	51
REDWOOD CITY	2,544	534	256	660	1,094
SAN BRUNO	378	72	39	110	157
SAN CARLOS	368	65	32	89	182
SAN MATEO	2,437	479	239	673	1,046
SOUTH SAN FRANCISCO	1,331	277	131	360	563
WOODSIDE	41	5	3	8	25
UNINCORPORATED	1,680	252	146	454	828
<b>Total</b>	<b>16,305</b>	<b>3,214</b>	<b>1,567</b>	<b>4,305</b>	<b>7,219</b>

Table 7.  
Total Housing Need by Income Category  
Santa Clara County and Cities

Jurisdiction	RHND Allocation	Very Low	Low	Moderate	Above Moderate
CAMPBELL	777	165	77	214	321
CUPERTINO	2,720	412	198	644	1,466
GILROY	3,746	906	334	1,030	1,476
LOS ALTOS	261	38	20	56	147
LOS ALTOS HILLS	83	10	5	15	53
LOS GATOS	402	72	35	97	198
MILPITAS	4,348	698	351	1,146	2,153
MONTE SERENO	76	10	5	13	48
MORGAN HILL	2,484	455	228	615	1,186
MOUNTAIN VIEW	3,423	698	331	991	1,403
PALO ALTO	1,397	265	116	343	673
SAN JOSE	26,114	5,337	2,364	7,086	11,327
SANTA CLARA	6,339	1,294	590	1,786	2,669
SARATOGA	539	75	36	108	320
SUNNYVALE	3,836	736	361	1,075	1,664
UNINCORPORATED	1,446	325	158	651	312
<b>Total</b>	<b>57,991</b>	<b>11,424</b>	<b>5,173</b>	<b>15,659</b>	<b>25,735</b>

Table 8.  
Total Housing Need by Income Category  
Solano County and Cities

Jurisdiction	RHND Allocation	Very Low	Low	Moderate	Above Moderate
BENICIA	413	70	49	90	204
DIXON	1,464	268	237	379	580
FAIRFIELD	3,812	761	573	972	1,506
RIO VISTA	1,391	357	190	342	502
SUISUN CITY	1,004	191	123	256	434
VACAVILLE	4,636	860	629	1,172	1,975
VALLEJO	3,242	690	474	779	1,299
UNINCORPORATED	2,719	500	363	771	1,085
<b>Total</b>	<b>18,681</b>	<b>3,697</b>	<b>2,638</b>	<b>4,761</b>	<b>7,585</b>

Table 9.  
Total Housing Need by Income Category  
Sonoma County and Cities

Jurisdiction	RHND Allocation	Very Low	Low	Moderate	Above Moderate
CLOVERDALE	423	95	51	128	149
COTATI	567	113	63	166	225
HEALDSBURG	573	112	78	171	212
PETALUMA	1,144	206	124	312	502
ROHNERT PARK	2,124	401	270	597	856
SANTA ROSA	7,654	1,539	970	2,120	3,025
SEBASTOPOL	274	58	35	75	106
SONOMA	684	146	90	188	260
WINDSOR	2,071	430	232	559	850
UNINCORPORATED	6,799	1,311	1,116	1,563	2,809
<b>Total</b>	<b>22,313</b>	<b>4,411</b>	<b>3,029</b>	<b>5,879</b>	<b>8,994</b>

Table 10.  
Total Housing Need by Income Category  
San Francisco Bay Area Region

Jurisdiction	RHND Allocation	Very Low	Low	Moderate	Above Moderate
ALAMEDA COUNTY	46,352	9,820	5,084	12,351	19,097
CONTRA COSTA COUNTY	34,710	6,481	3,741	8,551	15,937
MARIN COUNTY	6,515	1,241	618	1,726	2,930
NAPA COUNTY	7,063	1,434	1,019	1,775	2,835
SAN FRANCISCO CITY/COUNTY	20,372	5,244	2,126	5,639	7,363
SAN MATEO COUNTY	16,305	3,214	1,567	4,305	7,219
SANTA CLARA COUNTY	57,991	11,424	5,173	15,659	25,735
SOLANO COUNTY	18,681	3,697	2,638	4,761	7,585
SONOMA COUNTY	22,313	4,411	3,029	5,879	8,994
<b>REGIONAL TOTAL</b>	<b>230,302</b>	<b>46,966</b>	<b>24,995</b>	<b>60,646</b>	<b>97,695</b>

**ASSOCIATION OF BAY AREA GOVERNMENTS  
EXECUTIVE BOARD**

**RESOLUTION 07-01**

**RESOLUTION AUTHORIZING ADOPTION OF REVISIONS  
TO THE ALLOCATION OF REGIONAL HOUSING NEEDS  
IN ACCORDANCE WITH THE APPEALS COMMITTEE**

**WHEREAS**, the Association of Bay Area Governments (hereinafter "ABAG") is a joint powers agency formed pursuant to the agreement of its members and California Government Code § 6500, *et seq.*, and is the council of governments (COG) for the San Francisco Bay Area; and

**WHEREAS**, pursuant to the Housing Element Law ("Act") at California Government Code § 65580, *et seq.*, each COG and the California Department of Housing and Community Development (HCD) are required to determine the existing and projected housing needs in the COG's region; and

**WHEREAS**, each COG is further required to determine each city's and county's share of the regional housing needs; and

**WHEREAS**, ABAG has prepared and circulated, for public review and comment, a draft allocation of regional housing needs; and

**WHEREAS**, on November 16, 2000, the ABAG Executive Board adopted an allocation of regional housing needs; and

**WHEREAS**, ten (10) jurisdictions appealed their allocations, and on January 25, 2001, each appeal was considered by an Appeals Committee duly authorized by the Executive Board to hear such appeals; and

**WHEREAS**, as described in the staff report to the Executive Board dated March 15, 2001, the Appeals Committee decided to revise the allocations for the cities of Alameda and Richmond and rejected all other appeals.

**NOW THEREFORE BE IT RESOLVED**, that the Association of Bay Area Governments Executive Board hereby revises the allocation of regional housing needs in accordance with the Appeals Committee's action and forwards the regional housing needs allocations as revised to the Department of Housing and Community Development.

**PASSED AND ADOPTED THIS 15th day of March, 2001.**

**SIGNED:**

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William J. "Bill" Carroll, President

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Eugene Y. Leong, Secretary-Treasurer