

**REGIONAL HOUSING NEEDS ALLOCATION**

Association of Bay Area Governments

**2023-2031 Regional Housing Needs Assessment (RHNA) Appeal Request***Submit appeal requests and supporting documentation via DocuSign by 5:00 pm PST on July 9, 2021.****Late submissions will not be accepted.*** Send questions to [rhna@bayareametro.gov](mailto:rhna@bayareametro.gov)Jurisdiction Whose Allocation is Being Appealed: San RamonFiling Party:  HCD  Jurisdiction: San RamonContact Name: Cindy Yee Title: Senior PlannerPhone: 925-973-2560 Email: cye@sanramon.ca.gov**APPEAL AUTHORIZED BY:**Name: Debbie ChamberlainSignature: Date: 7/10/2021**PLEASE SELECT BELOW:**

- Mayor
- Chair, County Board of Supervisors
- City Manager
- Chief Administrative Officer
- Other: Community Development Director

**IDENTIFY ONE OR MORE BASES FOR APPEAL [Government Code Section 65584.5(b)]**

- ABAG failed to adequately consider information submitted in the Local Jurisdiction Survey regarding RHNA Factors (Government Code Section 65584.04(e)) and Affirmatively Furthering Fair Housing (See Government Code Section 65584.04(b)(2) and 65584(d)(5)):
- Existing and projected jobs and housing relationship.
  - Sewer or water infrastructure constraints for additional development due to laws, regulatory actions, or decisions made by a provider other than the local jurisdiction.
  - Availability of land suitable for urban development or for conversion to residential use.
  - Lands protected from urban development under existing federal or state programs.
  - County policies to preserve prime agricultural land.
  - Distribution of household growth assumed for Plan Bay Area 2050.
  - County-city agreements to direct growth toward incorporated areas of county.
  - Loss of units contained in assisted housing developments.
  - Households paying more than 30% or 50% of their income in rent.
  - The rate of overcrowding.
  - Housing needs of farmworkers.
  - Housing needs generated by the presence of a university campus within a jurisdiction.
  - Housing needs of individuals and families experiencing homelessness.
  - Loss of units during a declared state of emergency from January 31, 2015 to February 5, 2020.
  - The region's greenhouse gas emissions targets to be met by Plan Bay Area 2050.
  - Affirmatively furthering fair housing.
- ABAG failed to determine the jurisdiction's Draft RHNA Allocation in accordance with the Final RHNA Methodology and in a manner that furthers, and does not undermine the RHNA Objectives (see Government Code Section 65584(d) for the RHNA Objectives).
- A significant and unforeseen change in circumstances has occurred in the local jurisdiction or jurisdictions that merits a revision of the information submitted in the Local Jurisdiction Survey (*appeals based on change of circumstance can only be made by the jurisdiction or jurisdictions where the change occurred*).

Pursuant to Government Code Section 65584.05, appeals shall be based upon comparable data available for all affected jurisdictions and accepted planning methodology, and supported by adequate documentation, and shall include a statement as to why the revision is necessary to further the intent of the objectives listed in Government Code Section 65584(d). An appeal shall be consistent with, and not to the detriment of, [the development pattern in the sustainable communities strategy \(Plan Bay Area 2050 Final Blueprint\)](#). (Click here)

**Number of units requested to be reduced or added to jurisdiction’s Draft RHNA Allocation:**

Decrease    Number of Units: 1,450                       Increase    Number of Units: \_\_\_\_\_

**Brief description of appeal request and statement on why this revision is necessary to further the intent of the objectives listed in Government Code Section 65584(d) and how the revision is consistent with, and not to the detriment, of the development pattern in Plan Bay Area 2050.** Please include supporting documentation for evidence as needed, and attach additional pages if you need more room.

See San Ramon's Attached Appeal Letter that describes request and reasoning for appeal.

**List of supporting documentation, by title and number of pages**

1. San Ramon Appeal Letter to ABAG RHNA Manager, 3 pages
2. San Ramon Growth Geographies Map, 1 page
3. \_\_\_\_\_



Click here to attach files

The maximum file size is 25MB. To submit larger files, please contact [rhna@bayareametro.gov](mailto:rhna@bayareametro.gov).



*City of San Ramon*

---

7000 BOLLINGER CANYON RD.  
SAN RAMON, CALIFORNIA 94583  
PHONE: (925) 973-2500  
WEB SITE: [WWW.SANRAMON.CA.GOV](http://WWW.SANRAMON.CA.GOV)

---

July 8, 2021

Association of Bay Area Governments  
Attn: Gillian Adams, RHNA Manager  
Bay Area Metro Center  
375 Beale Street, Suite 800  
San Francisco, CA 94105-2066  
[gadams@bayareametro.gov](mailto:gadams@bayareametro.gov)

**SUBJECT: Appeal of the 6<sup>th</sup> Cycle Regional Housing Need Assessment (RHNA) Draft Allocation for the City of San Ramon**

Over the past 18 months, the City has been following the RHNA allocation process based on the Housing Methodology Committee's (HMC) recommendations. The selection of RHNA methodology 8A and additional strategies added by Plan Bay Area 2050 have resulted in a housing allocation that is overweighed based on High Opportunity Areas and underweighted to Jobs-Housing balance. The City is dismayed by the increase in units as a result of the selected methodology and feels that the RHNA has fail to recognize local land use changes that have the potential to materially affect the City's allocation and overall feasibility to address local housing numbers.

While we may fundamentally disagree with the selected methodology, our appeal focuses on what we perceive to be flaws in the RHNA process and data utilization that has resulted in a disproportionate housing numbers for the City of San Ramon based on the following factors:

**Incorrect and dated Jobs Projections for the Jobs/Housing Balance- (Change in Circumstance)**

As stated in the Draft Regional Housing Needs Allocation Plan "The final RHNA methodology directly incorporates the forecasted development pattern from the Plan Bay Area 2050 Final Blueprint as the baseline allocation. The Final Blueprint emphasizes growth near job centers and in locations near transit, as well as in high-resource areas, with the intent of reducing greenhouse gas emissions. The strategies incorporated into the Final Blueprint help improve the region's jobs-housing balance, leading to shorter commutes—especially for low-income workers." The methodology also aligns with the Statutory Objective 3 "Promoting an improved intraregional relationship between jobs and housing, including an improved balance between the number of low-wage jobs and the number of housing units affordable to low-wage workers in each jurisdiction."

---

City Council 973-2530  
City Manager: 973-2530  
City Attorney: 973-2549

City Clerk: 973-2539  
Employee Services: 973-2503  
Finance Department: 973-2609

Parks & Community Services: 973-3200  
Police Services: 973-2700  
Economic Development: 973-2554

Planning Department: 973-2560  
Public Services: 973-2800  
Engineering Services: 973-2670

While the City supports the jobs-housing philosophy, we do not feel the forecasted development pattern from the Plan Bay Area 2050 has captured recent changes that significantly impact the jobs-housing balance for San Ramon as it relates to RHNA. As the home to Bishop Ranch Office Park, San Ramon has been a jobs-rich community, which has driven the continued emphasis on housing for the City. Blueprint 2050 utilizes a data set based on 2015 projections that form the basis for the RHNA allocations.

We believe the methodology failed to adequately consider information submitted by the City of San Ramon as part of the Local Jurisdiction Survey, which has since also resulted in a significant change in circumstances. In the survey response, the City of San Ramon stated the City was reviewing opportunities with Bishop Ranch Office Park to develop the CityWalk Master Plan (City Center Mixed Use project) for up to 4,500 housing units near an existing job center and transportation networks. In August 2020, the City adopted the CityWalk Master Plan as a new vision to achieve a mix of housing and commercial uses within the City core (City Center PDA), including the Bishop Ranch Office Park. The housing component of the Master Plan includes up to 4,500 residential units, subject to inclusionary standards, to be constructed over the next three Housing Element cycles. To accomplish this level of development, surface parking lots as well as previously entitled/constructed office uses were replaced with housing sites.

The adopted CityWalk Master Plan also results in significant changes in the employment assumptions going forward, and should be reflected in the RHNA allocation. Additionally, other office sites within the Office Park (Bishop Ranch 6) are in the process of being converted to housing sites, which adds to the reduction in job/employment assumptions. The following table represents the revisions to projects sites within San Ramon's PDAs and the corresponding reduction in employment:

**Commercial Sites and Jobs Lost between 2015 to 2021:**

<b>Project Site</b>	<b>Sq. footage</b>	<b>New Use</b>	<b>Units</b>	<b>PDA</b>	<b>Est. Jobs Lost*</b>
Bishop Ranch 2	(194,650)	Retail/Commercial	0	City Center	**564-232=(332)
Bishop Ranch 1	(680,000)	Residential	652	City Center	(1,971)
Bishop Ranch 6***	(564,000)	Residential	404	NCRSP	(1,635)
<b>Totals</b>	<b>(1,438,650) SF lost</b>		<b>1,056</b>		<b>(3,938) jobs lost</b>

\*1 Job per 345 sf of office

\*\*Net considering addition of retail jobs

\*\*\*Entitlement in process 2021

This reduction in employment, coupled with changes in the commute patterns, has limited the job pool that can be assumed within the definitions used for the "Jobs Proximity-Transit" metric. San Ramon has no rail stations and changes in commuter patterns, including decreased commuter demand in response to COVID-19 have resulted in the suspension of supplemental Express Bus service to BART as part of Bishop Ranch's Transportation Demand Management (TDM) program. The City has no control over the operation of future express service levels and therefore the job base is limited by the 45-minute travel

time, defined by the Jobs Proximity-Transit metric, to San Ramon and the immediately surrounding residential areas, which has a minimal additional employment base.

### **Uncertainty Regarding the Impact of Recent Annexations**

Since 2016, the City has had 2 annexation in the Dougherty Valley. Annexation DV 17 added 44 acres, 308 housing units with an estimated population of 897 residents. Annexation DV 18 added 876 acres, 978 housing units with an estimated population of 2,905 residents. These annexations should ultimately be considered in the 2050 Growth Geographies (as planned growth for the City), however it is unclear if this baseline information was factored into the 6th cycle RHNA process housing demand.

### **Growth Geography - High Resource Areas Fail to Address Land Use Constraints**

The emphasis on Job Proximity and access to High Resource Areas has been an essential part of establishing the Growth Geography. While demographics, transit and available resources establish the High Resource Areas, they are not directly correlated with the ability to develop. For San Ramon, the Plan Bay Area 2050 Final Blueprint established a High Resource Area outside the PDA which is generally located along bus routes within established suburban neighborhoods that are substantially built-out (Attachment A). The new housing unit factors associated with the High Resource Areas cannot be accommodated in these areas based on the existing land use pattern and the fact that the economic conditions would not support redevelopment based on a relatively new supply of housing stock and fragmented ownership. A minimal amount of additional development such as Accessory Dwelling Units (ADUs) may be possible; however, it is not near the level of housing units allocated as a result of the High Resource Area growth geography. Additionally, the PDAs already have programmed housing to address the proportionate future need within those areas and carrying capacity may limit the ability to fully address the increase RHNA as a result of the High Resource Area growth geography. Relying on a RHNA process data that is disconnected from existing constraints, feasibility, and economic considerations results in an overestimation of the City's ability to address future housing demands and further constrains the region's ability to produce units.

We ask for your consideration of San Ramon's appeal and an adjustment of our allocation accordingly. If you wish to discuss our comments further, please contact me by email at [dchamberlain@sanramon.ca.gov](mailto:dchamberlain@sanramon.ca.gov) or by telephone at 925-973-2566.

Sincerely,



Debbie Chamberlain  
Community Development Director

Attachment: Plan Bay Area 2050 Final Blueprint Growth Geographies (San Ramon)

Cc: San Ramon City Council/City Manager  
Lauren Barr Planning Manager

# Plan Bay Area 2050: Final Blueprint Growth Geographies

Adopted by ABAG Executive Board and MTC Commission, September 2020

