



Town of Moraga

MAYOR'S OFFICE

September 16, 2021

Jesse Arreguin, ABAG President
Association of Bay Area Governments
375 Beale Street, Suite 800
San Francisco, CA 94105-2066

Re: RHNA Letter of Protest Submitted by the Town of Moraga

Dear Mr. Arreguin:

The Town of Moraga recognizes the State of California's need to address the overall housing crisis. The Town recognizes the California Department of Housing and Community Development (HCD) and the Association of Bay Area Governments (ABAG) as the lead agencies tasked with developing a methodology for a wide range of jurisdictions. ABAG and its staff are commended for leading a difficult and complex effort. The Town has been an active participant in the Regional Housing Needs Allocation (RHNA) methodology process. Housing affordability and homelessness are among the most critical issues facing California cities. Affordably priced homes are out of reach for many people and housing is not being built fast enough to meet current or projected needs. Cities lay the groundwork for housing production by planning and zoning new projects in their communities based on extensive public input and engagement, state housing laws, and the needs of the building industry.

The Town Council has voted not to appeal the RHNA allocation and is instead filing a letter of protest. This letter of protest recognizes the numerous and increasing risks of climate change and Moraga's ability to **safely zone** for 1,118 new units for the 6th cycle Housing Element as discussed below.

CAL FIRE Maps: The RHNA allocations are based upon 2007 CAL FIRE Maps, not the updated CAL FIRE Maps anticipated to be released in the coming months. The updated CAL FIRE maps will provide more accurate information regarding Very High Fire Severity Zones (VHFSZ) which could have a significant impact on the potential location and reasonable number of additional housing units to be located in Moraga due to evacuation challenges. It is premature to finalize allocations prior to the new maps being released given the increasing impacts of climate change and greater understanding of fire which likely impacts the finding of fact for Moraga, a Community at Risk as defined by the California Office of the State Fire Marshal, and potentially impacts the Town of Moraga's ability to accommodate 1,118 new units.

Evacuation: The Town of Moraga is surrounded by East Bay hills open space and the Cities of Lafayette and Orinda, the majority of which are in VHFSZ. Moraga residents must evacuate through Lafayette or Orinda's existing single-family neighborhoods on two-lane country roads as there is no direct access to a highway. Current peak rush hour traffic on the three-mile trip out of town is in excess of 30 minutes. If an evacuation is ordered, evacuation will be severely impacted by the capacity of the roadways.

In closing, the Town of Moraga envisions climate change with wildfires having a significant impact on future development and safety. This is not just about increased fire risk in Moraga as climate change is impacting communities throughout the State. It is imperative that the ABAG and the State of California implement a comprehensive approach to supporting housing development in areas that are not just close to transit and areas with high resources, but also consider climate change, wildfire and safety of current and future residents. The Town of Moraga appreciates this opportunity to share our ongoing concerns with the RHNA assignment. If you have any questions, please do not hesitate to contact me or the Town's Planning Director, Afshan Hamid at ahamid@moraga.ca.us.

Sincerely,



Mike McCluer, Mayor
Town of Moraga

C: Moraga Town Council
Town of Moraga Staff: Manager Battenberg, Police Chief King, Planning
Director Hamid
Moraga-Orinda Fire District Chief Winnacker