Housing Methodology Committee

Bay Conservation and Development Commission (BCDC)
50 California Street, 26th Floor
San Francisco, CA

Meeting –January 4, 2007
10:00 a.m. - 1:00 p.m.

Time (approx.)

1. **CALL TO ORDER/INTRODUCTIONS**

2. **ALTERNATIVE RHNA ALLOCATION METHODOLOGIES**   40 minutes
   Staff will review possible alternative RHNA allocation methods and ask for
   committee discussion. Alternative methods have been developed in response to
   comments on draft methodology.*

3. **ALTERNATIVE INCOME ALLOCATIONS**   40 minutes
   Staff will review possible alternatives to the income allocation method and ask
   for committee discussion. Alternative income methods have been developed in
   response to comments on draft methodology.*

4. **SUBREGION UPDATE**   15 Minutes
   Staff from the San Mateo County subregion will update committee on their
   progress toward developing a draft RHNA allocation methodology.

5. **SURVEY OF STUDENT POPULATIONS**   15 minutes
   Staff will report on the status of the student population survey. Survey was
   distributed to jurisdictions in mid-December. *

6. **DETERMINATION OF REGIONAL NEED BY HCD**   15 minutes
   Staff will report on the status of negotiations with HCD to determine
   the region's 2007-2014 regional housing need.

7. **Public Comment**   10 Minutes

8. **Adjournment**

In-Meeting Lunch (HMC members only):   **11:45 a. m.**

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* Handout at meeting

M E M O

To: Housing Methodology Committee (HMC)

From: ABAG Staff

Date: January 4, 2007

Subject: Alternative RHNA Allocation Methodologies

Background

On November 16, 2006, ABAG's Executive Board authorized the release of the Housing Methodology Committee's draft methodology for the Regional Housing Needs Allocation (RHNA) for 2007-2014. The release of the methodology opened a 60-day public comment period. The comment period will close on January 18, 2007. On that date, staff will bring to the Executive Board recommendations for the final RHNA methodology.

Thus far, comments received on the draft RHNA method are predominately on the weighted factors component of the methodology. Local jurisdictions have expressed concern with the use of both existing and planned transit as factors in the methodology. Some believe that this factor unfairly burdens those jurisdictions with either existing or planned transit, especially those cities with multiple transit stations.

Staff has developed three alternative scenarios for the HMC and ABAG Executive Board's consideration on January 18th. The alternative scenarios include 1) a reduced transit factor; 2) existing transit only; and 3) no transit. This staff report describes these alternatives and the anticipated impact to local housing allocations.

Alternative RHNA Scenarios

The HMC identified three broad categories of factors to be considered for inclusion in the RHNA methodology, including housing, employment and access to public transit (existing and planned).

Draft Recommendation

The weighted factors in the draft allocation methodology, as recommended by the HMC are:

- Household Growth, 40 percent;
- Employment Growth, 20 percent,
- Existing Employment, 20 percent
- Household Growth near Transit, 10 Percent;
- Employment Growth near Transit, 10 Percent

As expressed in the public comments received thus far, the transit component of this allocation scenario is a point of contention for many jurisdictions in the Bay Area. The HMC and ABAG staff agreed, however, that a factor that directs growth to areas with public transit could benefit the region. Growth near transit could improve regional and interregional commuting, reduce vehicle miles traveled, and therefore lower carbon emissions and greenhouse gases.

In response to the concerns over the transit component of the allocation method, staff has developed three alternative scenarios. The alternative allocation scenarios reduce the weight of the transit factor, remove planned transit, and remove transit altogether as a factor in the methodology.

Alternative 1: Reduced Transit
This scenario reduces the weight of the transit factor in the methodology. In addition, planned transit is removed from consideration. Only existing transit stations, fixed rail and ferry, are included. As a result, household growth, existing jobs and employment growth receive a greater weight in the allocation formula.

Under this scenario, the weighted factors are:
- Household Growth, 45 percent;
- Employment Growth, 22.5 percent,
- Existing Employment, 22.5 percent
- Household Growth near Transit, 5 Percent;
- Employment Growth near Transit, 5 Percent

The effect of reducing transit's weight in the allocation and removing planned transit is that many jurisdictions with transit, including Oakland, San Francisco, Berkeley and similar cities, would see their allocations reduced over the draft method numbers. Allocations would go up in cities with high levels of expected household growth and/or where there are no or few transit stations, including Brentwood, Antioch, Oakley, and the northern rural counties of Napa, Solano, and Sonoma.

Because household growth is weighted more heavily in this scenario, in many of the jurisdictions with planned transit, anticipated increases in household growth would offset any reduction that removing the planned transit option would have had. Therefore, most jurisdictions with planned transit would see their allocations go up over the draft allocation numbers. These jurisdictions include Brentwood, Antioch, Oakley, and Santa Rosa.

Alternative 2: Existing Transit Only
This scenario keeps the same weights for each factor as the draft method; however planned transit is removed from consideration - only existing transit is included.

Under this scenario, the weighted factors are:
- Household Growth, 40 percent;
- Employment Growth, 20 percent,
- Existing Employment, 20 percent
- Household Growth near Existing Transit, 10 Percent;
- Employment Growth near Existing Transit, 10 Percent

The effect of removing planned transit and only including existing transit is that jurisdictions with planned transit would see their allocation go down, compared to the draft allocation numbers. These jurisdictions include Brentwood, Antioch, Oakley, and the northern rural counties of Marin and Sonoma. Jurisdictions with existing transit, especially multiple transit stations, would see their allocation increase, including Oakland, San Francisco, Berkeley, El Cerrito, and San Leandro.

Alternative 3: No Transit
This scenario removes transit from the allocation methodology. The effect is that household growth and employment would be given greater weight. The effect of removing transit would be that jurisdictions

with transit, including Oakland, San Francisco, and Berkeley, and similar cities, would see their allocations reduced over the draft method numbers. Allocations would go up in cities with high levels of expected household growth and/or where there are no or few transit stations, including San Jose, Brentwood, Antioch, Oakley, and the northern rural counties of Napa, Solano, Marin and Sonoma.

Under this scenario, the weighted factors are:
- Household Growth, 50 percent;
- Employment Growth, 25 percent,
- Existing Employment, 25 percent

Summary

The scenarios described above demonstrate the various effects transit has as a factor on the RHNA allocation methodology. Staff recommends that the HMC consider these effects and come to a consensus recommendation for the ABAG Executive Board on how transit should be incorporated into the RHNA methodology.

	Draft Allocation	1 Existing TOD Less TOD	2 Existing TOD	3 No TOD
	40% HH Growth 20% Job Growth 20% 2007 Jobs 10% TOD Housing 10% TOD Jobs	**45% HH Growth 22.5% Job Growth 22.5% 2007 Jobs 5% TOD Housing 5% TOD Jobs**	**40% HH Growth 20% Job Growth 20% 2007 Jobs 10% TOD Housing 10% TOD Jobs**	**50% HH Growth 25% existing Jobs 25% Job Growth**
ALAMEDA	2,075	2,177	2,114	2,241
ALBANY	262	295	262	328
BERKELEY	2,714	2,691	2,802	2,580
DUBLIN	3,440	3,656	3,488	3,824
EMERYVILLE	1,537	1,431	1,614	1,247
FREMONT	4,827	4,668	4,578	4,759
HAYWARD	3,348	3,541	3,409	3,672
LIVERMORE	3,423	3,655	3,473	3,837
NEWARK	898	967	909	1,026
OAKLAND	17,099	15,873	17,933	13,813
PIEDMONT	37	42	37	47
PLEASANTON	3,688	3,712	3,785	3,639
SAN LEANDRO	1,874	1,835	1,942	1,729
UNION CITY	2,011	2,078	2,056	2,099
UNINCORPORATED	2,240	2,361	2,281	2,441
ALAMEDA COUNTY	49,474	48,983	50,684	47,283
ANTIOCH	2,302	2,440	2,169	2,711
BRENTWOOD	2,807	2,892	2,571	3,213
CLAYTON	145	163	145	181
CONCORD	3,120	3,281	3,179	3,383
DANVILLE	554	623	554	692
EL CERRITO	522	463	554	373
HERCULES	431	485	431	539
LAFAYETTE	358	378	364	392
MARTINEZ	1,046	1,140	1,055	1,226
MORAGA	223	250	223	278
OAKLEY	749	828	736	921
ORINDA	221	232	225	240
PINOLE	306	345	306	383
PITTSBURG	2,022	1,893	1,777	2,009
PLEASANT HILL	592	666	592	740
RICHMOND	2,761	3,000	2,788	3,212
SAN PABLO	283	318	283	353
SAN RAMON	3,292	3,703	3,292	4,115
WALNUT CREEK	2,208	2,229	2,271	2,186
UNINCORPORATED	3,662	3,689	3,377	4,001
CONTRA COSTA COUNTY	27,601	29,020	26,890	31,150
BELVEDERE	25	28	25	31
CORTE MADERA	232	261	232	290

	Draft Allocation	1 Existing TOD Less TOD	2 Existing TOD	3 No TOD
	40% HH Growth 20% Job Growth 20% 2007 Jobs 10% TOD Housing 10% TOD Jobs	**45% HH Growth 22.5% Job Growth 22.5% 2007 Jobs 5% TOD Housing 5% TOD Jobs**	**40% HH Growth 20% Job Growth 20% 2007 Jobs 10% TOD Housing 10% TOD Jobs**	**50% HH Growth 25% existing Jobs 25% Job Growth**
FAIRFAX	72	81	72	90
LARKSPUR	612	515	576	454
MILL VALLEY	278	312	278	347
NOVATO	1,431	1,327	1,180	1,475
ROSS	25	28	25	32
SAN ANSELMO	108	121	108	135
SAN RAFAEL	1,559	1,493	1,327	1,658
SAUSALITO	178	190	180	200
TIBURON	123	131	125	136
UNINCORPORATED	683	761	677	846
MARIN COUNTY	5,325	5,248	4,803	5,693
AMERICAN CANYON	692	779	692	866
CALISTOGA	90	101	90	112
NAPA	1,917	2,156	1,917	2,396
ST HELENA	116	130	116	145
YOUNTVILLE	84	94	84	105
UNINCORPORATED	625	704	625	782
NAPA COUNTY	3,524	3,964	3,524	4,404
SAN FRANCISCO COUNTY	40,494	35,365	42,836	27,894
SAN MATEO COUNTY	18,270	18,270	18,270	18,270
CAMPBELL	740	832	740	925
CUPERTINO	1,112	1,251	1,112	1,390
GILROY	1,585	1,716	1,602	1,830
LOS ALTOS	302	339	302	377
LOS ALTOS HILLS	77	87	77	96
LOS GATOS	533	600	533	667
MILPITAS	2,621	2,570	2,406	2,734
MONTE SERENO	40	44	40	49
MORGAN HILL	1,329	1,402	1,350	1,455
MOUNTAIN VIEW	2,754	2,915	2,802	3,029
PALO ALTO	3,716	3,790	3,813	3,766
SAN JOSE	33,259	34,906	32,610	37,203
SANTA CLARA	5,974	5,816	5,662	5,969
SARATOGA	277	312	277	347
SUNNYVALE	4,584	4,725	4,686	4,764
UNINCORPORATED	160	169	163	175
SANTA CLARA COUNTY	59,062	61,474	58,174	64,774

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BENICIA	505	569	505	632
DIXON	692	779	692	865
FAIRFIELD	3,665	4,065	3,679	4,451
RIO VISTA	1,159	1,304	1,159	1,448
SUISUN CITY	596	636	605	666
VACAVILLE	2,758	3,102	2,758	3,447
VALLEJO	3,094	3,312	3,139	3,484
UNINCORPORATED	94	105	94	117
SOLANO COUNTY	12,562	13,871	12,631	15,111
CLOVERDALE	505	445	396	495
COTATI	378	275	244	306
HEALDSBURG	396	354	315	394
PETALUMA	2,059	2,064	1,835	2,293
ROHNERT PARK	1,897	1,661	1,477	1,846
SANTA ROSA	6,673	6,986	6,210	7,763
SEBASTOPOL	168	189	168	210
SONOMA	336	377	336	419
WINDSOR	699	710	631	788
UNINCORPORATED	1,320	1,485	1,320	1,650
SONOMA COUNTY	14,430	14,547	12,931	16,163
REGION	230,743	230,743	230,743	230,743

M E M O

To:	Housing Methodology Committee (HMC)
From:	ABAG Staff
Date:	January 4, 2007
Subject:	Alternative Income Allocation Method

Background

On November 16, 2006, ABAG's Executive Board authorized the release of the Housing Methodology Committee's draft methodology for the Regional Housing Needs Allocation (RHNA) for 2007-2014. The release of the methodology opened a 60-day public comment period. The comment period will close on January 18, 2007. On that date, staff will bring to the Executive Board recommendations for the final RHNA methodology.

Several comments received on the draft RHNA method pertain to the income allocation component of the methodology. Some local jurisdictions believe the proposed income allocation methodology does not do enough to alleviate existing concentrations of poverty. There is concern that, because the draft recommendation assigns an "equal share" to each jurisdiction and does not take a jurisdiction's existing income distribution into account, it unfairly burdens jurisdictions with existing high concentrations of poverty. As a result, the draft method is perceived to perpetuate regional social and economic inequities.

Staff has developed three alternative income allocation scenarios for consideration by the HMC and the ABAG Executive Board at its meeting on January 18th. In contrast to the draft methodology, these alternative scenarios take into account existing income distributions within individual communities and attempt to address existing concentrations of poverty. This staff report describes these alternative income allocations.

HMC Recommended Income Allocation

In the recommendation to the ABAG Executive Board, the HMC and ABAG staff proposed that each local jurisdiction plan for income-based housing units in the same ratio as the regional average income distribution. This is deemed an "equal share" approach because each jurisdiction would receive the same proportion of housing units in each affordability category (very-low, low, moderate, and above moderate). Although considered an equitable approach, this income allocation method does not consider existing concentrations of poverty in a community. Based on 2000 Census figures, the regional income distribution is:

- **Very Low**, **23 Percent**
  Households with income up to 50 percent of the county's area median income (AMI)
- **Low, 16 Percent**
  Households with income between 50 and 80 percent of the county's AMI
- **Moderate, 19 Percent**
  Households with income between 80 and 120 percent of the county's AMI
- **Above-Moderate, 42 Percent**
  Households with income above 120 percent of the county's AMI

Percent Adjustment Toward Regional Average

By allocating each jurisdiction an equal share based on the regional income distribution, the draft allocation scenario moves each jurisdiction 100 percent toward the regional income distribution. It is focused on promoting an equitable regional distribution for future housing production, but does not consider existing concentrations of poverty in a community or take steps to reduce them.

In contrast, the first two alternative income allocation scenarios give each jurisdiction either 150 or 175 percent of the difference between their 2000 household income distribution and the 2000 regional household income distribution.

The first step in this process is to determine the difference between the regional proportion of households in an income category and the jurisdiction's proportion for that category. This difference is then multiplied by either 150 or 175 percent to determine an "adjustment factor." Finally, this adjustment factor is added to the jurisdiction's initial proportion of households in the income category, which results in the total share of the jurisdiction's housing unit allocation that will be in that income category.

Using the 175 percent factor and the City of Oakland's very low income category as an example, 36 percent of households in Oakland were in this category, while the regional total was 23 percent.

City	Jurisdiction Proportion	Regional Proportion	Difference	Multiplier	Adjustment Factor	Total Share
Oakland	36	23	-13	175%	-23	13

The difference between 23 and 36 is -13. This is multiplied by 175 percent for a result of -22.75 (rounded to 23). This is then added to the city's original distribution of 36 percent, for a total share of 13 percent. A similar calculation for Piedmont, which has a relatively low proportion of households in the "very low" income category yields the following results:

City	Jurisdiction Proportion	Regional Proportion	Difference	Multiplier	Adjustment Factor	Total Share
Piedmont	9	23	14	175%	24	33

As shown above, those jurisdictions that have a larger proportion of households in an income category will receive a smaller allocation of housing units in that category. Conversely, those jurisdictions that have a relatively low proportion of households in a category would receive a higher allocation of housing units in that category.

The effect of these allocation scenarios is to change the income distribution in each jurisdiction to more closely match the regional distribution by taking both a jurisdiction's existing conditions and future development into account. By addressing existing concentrations of poverty, these scenarios more aggressively promote an equitable regional income distribution. The multiplier determines how aggressively the scenario functions; the higher the multiplier, the more aggressive.

Tiered Adjustment Based on Concentration of Poverty

The third alternative scenario is similar to the first two alternatives in that it uses existing conditions to move each jurisdiction closer to the regional income distribution. The key difference in this scenario is that jurisdictions are first separated into three groups based on the jurisdiction's proportion of low- and very low-income households compared to the proportion for the region. The three groups correspond to

three different multipliers (like the 175 percent example used above) that determine how far a jurisdiction must move toward the regional income distribution.

The first step in this process is to add together the percentages of very low and low income households in a jurisdiction. Each jurisdiction's result is then compared to the regional proportion. Based on this comparison, jurisdictions are put into one of three categories:

- Low concentration: where less than 25 percent of total households have very low or low incomes.

- Moderate concentration: where less than 45 percent of total households have very low or low incomes.

- High concentration: where more than 45 percent of total households have very low or low incomes (San Pablo is the highest in the region at 65 percent).

Jurisdictions in the low concentration category, such as Livermore, Pleasanton, Clayton, Danville, and Los Altos Hills move the furthest (185 percent) toward the regional average. Those in the moderate concentration category, such as Albany, Walnut Creek, Napa, San Francisco, and San Jose, move 180 percent and those in the high concentration category, which includes Berkeley, Oakland, Richmond, San Rafael, Gilroy, and Sebastopol, move 175 percent.

Once the multiplier for the jurisdiction has been determined, the steps for determining the jurisdiction's share of housing units in each income category is the same as the one for the first alternative methodology described above.

Taking the City of Piedmont example used above, this scenario would result in a higher share of very low-income units for the city because the city falls into the low concentration category and has a multiplier of 185 percent. Here, the share is 35 percent compared to 33 percent in the example above.

City	Jurisdiction Proportion	Regional Proportion	Difference	Multiplier	Adjustment Factor	Total Share
Piedmont	9	23	14	185%	26	35

The result of this allocation scenario is that jurisdictions with a low concentration of low and very low income households get higher allocations of very low- and low-income housing units. Those jurisdictions that already have a high concentration of very low- and low-income households are allocated fewer units in these categories.

As in the first alternative scenario, the effect of this allocation scenario is to change the income distribution in each jurisdiction to more closely match the regional distribution by taking both a jurisdiction's existing conditions and future development into account. This third alternative scenario specifically looks at the proportion of very low- and low-income households in a jurisdiction as the factor for determining how far the jurisdiction must move toward the regional average income distribution.

Summary

The alternative allocation scenarios described above have been designed to promote a more equitable regional income distribution by addressing existing concentrations of poverty in individual jurisdictions. The scenarios demonstrate different possible approaches and outcomes for moving jurisdictions toward the region's income distribution. Staff recommends that the HMC consider these alternative income allocations and come to a consensus on a recommendation to the ABAG Executive Board.

Income Category Alternatives

| | | Average Regional Percentage | | | | Existing Percentages Plus 150% Regional Average Minus Exist | | | | Existing Percentages Plus 175% Regional Average Minus Exist | | | | Existing % into 3 Groups Higher Existing Concentration Gets Lower Allocation of Affordable | | | |
| | | Draft Allocation Proposal | | | | 150% Toward Regional Average | | | | 175% Toward Regional Average | | | | Tiered Adjustment | | | |
	Total Need	Very Low <50%	Low <80%	Mod <120%	Above Mod	Very Low <50%	Low <80%	Mod <120%	Above Mod	Very Low <50%	Low <80%	Mod <120%	Above Mod	Very Low <50%	Low <80%	Mod <120%	Above Mod
ALAMEDA	2,075	469	343	399	864	483	339	395	858	485	338	394	858	488	337	396	862
ALBANY	262	59	43	50	109	61	42	49	111	61	41	49	112	61	41	49	112
BERKELEY	2,714	614	449	521	1,130	448	468	579	1,218	361	479	608	1,266	362	479	612	1,272
DUBLIN	3,440	778	569	661	1,432	1,013	648	666	1,115	1,121	690	669	960	1,171	706	674	901
EMERYVILLE	1,537	348	254	295	640	283	243	293	716	249	239	293	757	250	239	295	761
FREMONT	4,827	1,092	799	927	2,009	1,357	923	947	1,604	1,476	988	957	1,406	1,533	1,012	968	1,332
HAYWARD	3,348	757	554	643	1,394	758	506	585	1,499	751	484	556	1,557	754	479	554	1,576
LIVERMORE	3,423	774	567	657	1,425	958	636	674	1,157	1,040	673	682	1,028	1,080	686	690	979
NEWARK	898	203	149	172	374	246	161	164	327	265	168	160	304	270	169	160	301
OAKLAND	17,099	3,867	2,831	3,284	7,117	2,766	2,595	3,521	8,208	2,189	2,487	3,641	8,782	2,197	2,486	3,666	8,825
PIEDMONT	37	8	6	7	16	11	8	9	9	12	10	10	5	13	10	11	4
PLEASANTON	3,688	834	610	708	1,535	1,087	753	772	1,078	1,204	827	804	853	1,258	855	822	766
SAN LEANDRO	1,874	424	310	360	780	423	280	330	841	419	267	315	874	420	263	314	885
UNION CITY	2,011	455	333	386	837	539	382	389	702	576	408	390	637	587	413	393	626
UNINCORPORATED	2,240	507	371	430	932	539	360	416	925	549	356	409	925	554	355	411	929
ALAMEDA COUNTY	49,474	11,189	8,190	9,502	20,593	10,972	8,344	9,788	20,368	10,711	8,361	9,831	20,571	11,000	8,531	10,013	20,133
ANTIOCH	2,302	521	381	442	958	521	357	400	1,023	516	347	380	1,059	518	344	378	1,071
BRENTWOOD	2,807	635	465	539	1,168	708	458	509	1,132	738	457	493	1,118	748	456	494	1,120
CLAYTON	145	33	24	28	60	42	30	30	42	47	33	31	33	49	35	32	30
CONCORD	3,120	706	517	599	1,299	672	466	536	1,445	649	443	505	1,524	648	438	502	1,546
DANVILLE	554	125	92	106	230	166	113	127	147	185	124	138	106	194	129	143	90
EL CERRITO	522	118	86	100	217	114	77	97	233	112	73	96	242	112	72	96	245
HERCULES	431	97	71	83	179	124	71	73	163	136	71	69	156	139	71	68	155
LAFAYETTE	358	81	59	69	149	102	71	75	110	112	77	78	91	116	80	80	83
MARTINEZ	1,046	236	173	201	435	251	168	183	444	255	166	174	449	258	166	174	452
MORAGA	223	50	37	43	93	63	42	47	70	69	45	49	59	72	46	50	55
OAKLEY	749	169	124	144	312	198	119	104	328	210	118	83	338	214	117	80	341
ORINDA	221	50	37	42	92	64	45	51	61	70	49	55	46	73	51	57	40
PINOLE	306	69	51	59	128	76	48	49	133	78	47	45	136	79	47	44	137
PITTSBURG	2,022	457	335	388	842	397	283	352	989	363	259	334	1,066	365	258	336	1,072
PLEASANT HILL	592	134	98	114	247	145	100	104	244	150	101	99	243	151	101	98	244
RICHMOND	2,761	624	457	530	1,149	462	376	525	1,396	376	337	523	1,524	378	337	526	1,532
SAN PABLO	283	64	47	54	118	35	40	56	152	20	37	57	169	20	37	57	170
SAN RAMON	3,292	744	545	632	1,370	994	637	676	987	1,110	686	698	798	1,163	704	711	726
WALNUT CREEK	2,208	499	365	424	919	510	351	420	927	510	346	417	935	513	344	420	940
UNINCORPORATED	3,662	828	606	703	1,524	844	622	708	1,489	844	632	711	1,476	848	633	716	1,480
CONTRA COSTA COUNTY	27,601	6,242	4,569	5,301	11,489	6,489	4,476	5,122	11,516	6,391	4,455	5,091	11,665	6,656	4,466	5,063	11,530

Income Category Alternatives

		Average Regional Percentage — Draft Allocation Proposal				Existing Percentages Plus 150% Regional Average Minus Exist — 150% Toward Regional Average				Existing Percentages Plus 175% Regional Average Minus Exist — 175% Toward Regional Average				Existing % into 3 Groups / Higher Existing Concentration Gets Lower Allocation of Affordable — Tiered Adjustment			
	Total Need	Very Low <50%	Low <80%	Mod <120%	Above Mod	Very Low <50%	Low <80%	Mod <120%	Above Mod	Very Low <50%	Low <80%	Mod <120%	Above Mod	Very Low <50%	Low <80%	Mod <120%	Above Mod
BELVEDERE	25	6	4	5	10	7	5	6	7	7	6	6	6	7	6	6	6
CORTE MADERA	232	52	38	44	96	61	37	44	90	64	37	43	88	65	37	43	88
FAIRFAX	72	16	12	14	30	16	10	13	34	15	8	12	36	15	8	12	36
LARKSPUR	612	138	101	118	255	142	93	119	258	143	90	119	260	144	89	120	262
MILL VALLEY	278	63	46	53	116	68	50	60	100	70	52	64	92	70	52	65	91
NOVATO	1,431	324	237	275	596	320	212	259	640	315	200	252	664	315	198	252	672
ROSS	25	6	4	5	11	7	5	5	8	7	6	5	7	8	6	5	7
SAN ANSELMO	108	24	18	21	45	24	18	20	45	24	18	20	45	24	18	20	45
SAN RAFAEL	1,559	353	258	299	649	312	241	311	695	288	233	317	721	289	233	319	724
SAUSALITO	178	40	29	34	74	46	32	35	65	48	33	36	61	49	33	36	60
TIBURON	123	28	20	24	51	34	22	26	41	37	23	28	35	38	23	28	34
UNINCORPORATED	683	155	113	131	284	160	119	142	263	161	122	148	253	162	123	150	252
MARIN COUNTY	5,325	1,204	882	1,023	2,217	1,196	843	1,041	2,246	1,210	861	1,072	2,182	1,187	825	1,058	2,277
AMERICAN CANYON	692	157	115	133	288	160	112	134	287	159	112	135	287	160	111	136	288
CALISTOGA	90	20	15	17	37	17	12	17	43	16	10	17	46	16	10	18	46
NAPA	1,917	433	317	368	798	439	294	361	823	438	283	357	839	440	280	359	846
ST HELENA	116	26	19	22	48	28	20	23	45	28	20	24	43	29	21	24	43
YOUNTVILLE	84	19	14	16	35	17	14	15	37	15	15	15	38	15	15	15	39
UNINCORPORATED	625	141	104	120	260	163	109	123	231	173	112	124	217	175	113	125	215
NAPA COUNTY	3,524	797	583	677	1,467	824	561	673	1,465	833	550	672	1,469	835	550	676	1,476
SAN FRANCISCO COUNTY	40,494	9,158	6,703	7,778	16,855	8,759	7,061	8,387	16,285	8,477	7,268	8,695	16,055	8,464	7,301	8,816	16,080
SAN MATEO COUNTY	18,270	4,132	3,024	3,509	7,605	4,132	3,024	3,509	7,605	4,292	2,930	3,382	7,667	4,302	2,923	3,374	7,671
CAMPBELL	740	167	122	142	308	166	109	134	331	163	102	130	344	164	101	130	348
CUPERTINO	1,112	252	184	214	463	300	208	224	381	322	220	229	342	328	222	231	335
GILROY	1,585	358	262	304	660	328	231	277	749	310	216	263	796	311	216	265	800
LOS ALTOS	302	68	50	58	126	85	59	69	89	92	64	74	71	96	66	77	64
LOS ALTOS HILLS	77	17	13	15	32	23	17	19	19	25	19	21	12	26	19	22	10
LOS GATOS	533	121	88	102	222	138	93	111	192	145	96	115	177	147	96	117	175
MILPITAS	2,621	593	434	503	1,091	683	442	474	1,022	721	449	460	991	733	449	460	989
MONTE SERENO	40	9	7	8	16	11	8	9	11	12	9	10	8	13	9	11	7
MORGAN HILL	1,329	300	220	255	553	315	242	249	522	319	255	247	509	321	257	248	508
MOUNTAIN VIEW	2,754	623	456	529	1,146	611	429	518	1,195	600	417	513	1,224	601	414	515	1,235
PALO ALTO	3,716	840	615	714	1,547	879	679	789	1,370	889	714	827	1,286	896	720	840	1,275
SAN JOSE	33,259	7,522	5,506	6,388	13,844	7,462	5,265	6,046	14,485	7,361	5,166	5,877	14,855	7,378	5,140	5,883	14,995
SANTA CLARA	5,974	1,351	989	1,147	2,487	1,328	955	1,055	2,636	1,304	942	1,009	2,719	1,306	938	1,006	2,748
SARATOGA	277	63	46	53	115	78	58	66	75	85	65	73	55	88	67	76	47
SUNNYVALE	4,584	1,037	759	881	1,908	1,087	746	824	1,927	1,102	743	795	1,943	1,111	742	795	1,955
UNINCORPORATED	160	36	26	31	67	35	26	32	67	34	26	33	67	34	26	33	68
SANTA CLARA COUNTY	59,062	13,357	9,777	11,344	24,584	13,528	9,569	10,895	25,071	13,668	9,642	10,940	24,813	13,553	9,484	10,709	25,560

Income Category Alternatives

		Average Regional Percentage **Draft Allocation Proposal**				Existing Percentages Plus 150% Regional Average Minus Exist **150% Toward Regional Average**				Existing Percentages Plus 175% Regional Average Minus Exist **175% Toward Regional Average**				Existing % into 3 Groups Higher Existing Concentration Gets Lower Allocation of Affordable **Tiered Adjustment**			
	Total Need	Very Low <50%	Low <80%	Mod <120%	Above Mod	Very Low <50%	Low <80%	Mod <120%	Above Mod	Very Low <50%	Low <80%	Mod <120%	Above Mod	Very Low <50%	Low <80%	Mod <120%	Above Mod
BENICIA	505	114	84	97	210	132	91	100	183	139	95	102	170	141	96	103	168
DIXON	692	157	115	133	288	177	101	121	293	186	95	116	296	188	93	115	298
FAIRFIELD	3,665	829	607	704	1,526	839	568	665	1,594	836	550	645	1,634	840	546	646	1,649
RIO VISTA	1,159	262	192	223	482	222	177	204	556	200	170	194	594	201	170	196	597
SUISUN CITY	596	135	99	115	248	158	104	99	235	168	108	91	230	171	108	90	230
VACAVILLE	2,758	624	456	530	1,148	686	451	499	1,121	711	451	484	1,111	720	450	485	1,114
VALLEJO	3,094	700	512	594	1,288	669	485	572	1,367	648	474	561	1,411	647	471	563	1,426
UNINCORPORATED	94	21	16	18	39	23	16	17	37	24	16	17	37	24	16	17	37
SOLANO COUNTY	12,562	2,841	2,080	2,413	5,229	2,907	1,993	2,277	5,386	2,990	1,998	2,236	5,338	2,932	1,950	2,214	5,519
CLOVERDALE	505	114	84	97	210	95	78	97	235	85	75	97	248	85	75	97	250
COTATI	378	85	63	73	157	94	57	68	159	98	54	66	160	99	53	65	161
HEALDSBURG	396	90	66	76	165	87	61	69	181	84	58	65	189	84	58	65	192
PETALUMA	2,059	466	341	395	857	524	364	390	781	549	376	388	745	556	379	390	742
ROHNERT PARK	1,897	429	314	364	790	445	294	341	816	449	286	329	832	453	284	329	839
SANTA ROSA	6,673	1,509	1,105	1,282	2,778	1,539	1,053	1,183	2,899	1,540	1,031	1,134	2,969	1,548	1,025	1,131	2,996
SEBASTOPOL	168	38	28	32	70	33	27	29	78	31	27	28	83	31	27	28	83
SONOMA	336	76	56	64	140	71	54	65	145	68	53	65	148	68	53	66	150
WINDSOR	699	158	116	134	291	181	123	133	262	191	128	132	248	194	128	133	247
UNINCORPORATED	1,320	299	219	254	549	306	214	253	547	306	213	253	548	308	212	254	551
SONOMA COUNTY	14,430	3,263	2,389	2,772	6,006	3,377	2,324	2,627	6,103	3,395	2,319	2,612	6,104	3,242	2,166	2,396	5,799
REGION	230,743	52,183	38,197	44,319	96,044	52,183	38,197	44,319	96,044	52,183	38,197	44,319	96,044	52,166	38,151	44,327	96,098

MEMO

December 8, 2006

TO: City Managers and County Executives

FR: Paul Fassinger, ABAG Research Director

RE: *Draft Regional Housing Needs Allocation Comments & Student Population Survey*

On November 16, 2006 the ABAG Executive Board authorized the release of the draft **Regional Housing Needs Allocation** methodology. The release of the draft method opened the 60-day public comment period; it ends on January 18, 2007. On that date, staff will bring to the Executive Board recommendations for the final methodology. The final methodology will include responses to all comments received on the draft RHNA methodology and reasons for any significant changes.

The purposes of this letter are: 1) to encourage your comments on the draft allocation methodology and 2) to request additional input on local student populations.

Background
The Regional Housing Needs (RHN) process is a state mandate on planning for housing in California. The State of California requires that all jurisdictions regularly update the housing elements in their general plans - housing elements serve as the local plan for how a jurisdiction will meet its share of the region's housing need.

The State of California, via the Housing and Community Development Department (HCD), determines each region's need for housing, primarily based on estimated population growth. Council's of Governments then allocate that need, for all income groups, amongst jurisdictions. As the region's Council of Governments, ABAG is responsible for allocating the state-determined regional housing need to all jurisdictions in the Bay Area. Once allocated, jurisdictions then plan for that need in their housing elements, which are state-certified by HCD.

Draft Methodology
The regional housing needs allocation methodology is the tool used to assign each jurisdiction in the Bay Area its share of the region's total housing need. The actual tool is a mathematical equation that consists of weighted factors. There are also a set of "rules" that dictate how units will be allocated by income, within spheres of influence, voluntary transfer of units, and subregions. The draft method encompasses all of these distinct components.

The mathematical component of the allocation method is to consider local land use plans and policies, regional growth policies and the state's housing polices, as expressed in the state mandated RHNA objectives. The draft allocation method, therefore, assigns local housing responsibility based 40% on household growth, 20% on existing employment, 20% on employment growth, 10% on job growth near transit and 10% on housing growth near transit.
(See www.abag.ca.gov/planning/housingneeds/docs2.htm for complete description of allocation methodology.)

Please review the draft allocation method in detail and submit any comments within the comment period. To ensure your comments are incorporated into staff recommendations to the Executive Board on the final method, you may wish to have your comments to us by early January.

Survey on Local Student Populations
On September 29, 2006 AB2572 went into effect. This legislation requires the consideration of student populations in the regional housing needs allocation methodology, i.e. in jurisdictions with a private university or a campus of the California State University or the University of California.

In using household population statistics in the methodology, we believe that the appropriate student populations are included in the draft methodology. Household population estimates are inclusive of the entire household population and would therefore account for all people living in homes - whether they are students or not is of no consequence.

Only the "group quarters" population - those living in college dormitories - are not included in household population counts. Group quarters population is taken into account in the "total population" estimates. Therefore, the allocation methodology does not propose a specific factor to represent the impact of student populations.

Jurisdictions with student populations may believe that student populations should be accounted for directly in the allocation methodology, rather than through the household population factor. Therefore, if your city has a student population base, and especially if you believe there is an alternative way to address this population, please respond to the survey questions listed below.

Responses should be returned within the comment period on the draft allocation methodology – before January 18, 2007. Responses may be included in your comments regarding the draft methodology. All survey responses and draft allocation comments can be sent to Paul Fassinger at paulf@abag.ca.gov. Thank you for your attention and timely response.

------- tear here --

Jurisdiction: _____

Survey Taker: _____

Student Populations Survey

1) Is a private university or a campus of the California State University or the University of California located in your jurisdiction?

   _____Yes   _____No   _____ I don't know.

2) If yes, how many students do you estimate live in regular housing, i.e. not college dormitories in your community?

   _____ Local student population estimate   _____ No local estimate available.

3) How do you think student populations should be accounted for in the regional housing needs allocation methodology? (Please use separate sheet for a detailed response, if necessary.)

   _____Using Household Population   _____ Other (Please describe on separate sheet or on back)

M E M O

To: Housing Methodology Committee (HMC)

From: ABAG Staff

Date: January 4, 2007

Subject: Summary of Comments about Draft Methodology

Background

On November 16, 2006, ABAG's Executive Board authorized the release of the Housing Methodology Committee's draft methodology for the Regional Housing Needs Allocation (RHNA) for 2007-2014. The release of the methodology opened a 60-day public comment period. The comment period will close on January 18, 2007. On that date, staff will bring to the Executive Board recommendations for the final RHNA methodology.

This memo presents summaries of the comments about the draft methodology that have been received to date. The first section describes written comments received from the public. The second section provides the discussion and public comments that occurred at the November 16th Executive Board meeting when the Board formally released the draft methodology. The third section summarizes the committee discussion about the draft methodology that occurred at the December 6th meeting of the ABAG Regional Planning Committee (RPC).

Public Comments

Town of Windsor, letter, 11/20/2006
The Town supports the RHNA recommendation as being consistent with Town policy and the General Plan.

Constance Wiggins, via email, 12/5/2006
The proposed 3000 new housing units is too high for a city the size of Berkeley. Large buildings are already being built along corridors, blocking existing views, causing density that negatively impacts the low-income people who tend to live along major streets.

Laura Fujii and Robert Wilkinson, letter, 12/6/2006
We strongly object to the proposed guidelines that would double the quota for new housing units in Berkeley and the urban core of the East Bay. It is a disproportionate impact on low income, minority, and urban core populations. It will require high-rise development along main transportation corridors that will adversely affect the village and town character of Berkeley and the East Bay. ABAG should not penalize urban areas that have promoted Smart Growth and should instead use incentives and penalties to move sprawl communities toward Smart Growth principles. New housing quotas should be equitably distributed between all jurisdictions, not placed on already highly urbanized and densely populated cities.

City of Redwood City, letter, 12/19/2006
These comments are provided in case the San Mateo County sub-region fails and ABAG assigns a default allocation to Redwood City. Although it does not meet the statutory requirements for use as a factor, Redwood City faces a significant growth constraint related to water supply. The City's water supply is

controlled by the San Francisco Public Utility Commission (SFPUC), not the city. Based on the amount of water available from the SFPUC, the city's maximum build out is 4,496 housing units and 69,980 jobs by 2030. ABAG's projected growth in households and jobs is much higher than the city's growth projections, which are based on water supply availability.

Also, Redwood City supports assigning responsibility for units in the Sphere of Influence (SOI) to the jurisdiction that has land use control over property within its SOI. Properties within Redwood City's SOI are not open space or agricultural lands, so development would not contribute to urban sprawl. None of the units based on the SOI should be assigned to the city.

City of Berkeley, letter, 1/3/2007
Based on the statutory allocation factors and ABAG's regional growth policies, the draft allocation methodology attempts to promote smart growth by focusing on city-centered growth and growth near transit. However, since this focus is applied to a set of projections that already incorporates smart growth policies to some degree, the RHNA allocations magnify the impact of the "smart growth" policies on certain communities, including Berkeley.

In determining which statutory factors to include in the allocation methodology, insufficient consideration was given to the impact of universities and colleges on housing needs in a community. The city proposes consideration of the following:

- The "vacancy factor" applied in college communities to increase the overall housing need number could be somewhat lower reflecting the extremely high demand and very low vacancy factors that exist in these areas, especially in high impact communities such as Berkeley where the proportion of students to overall population is very high.
- Projected household size should perhaps be adjusted to reflect the relatively high household size of students who squeeze into available housing.
- Since the University is the largest such institution in the Bay Area, and it is situated in a relatively small community (in comparison to the University's size), we believe ABAG should not apply the same RHNA jobs factor to Berkeley as to other communities. Those jobs should be spread among the many communities that contribute workers to the University.

The city is also concerned about the unrealistic expectations raised by these allocations and the impacts this will have on overall regional housing production. Despite policies that allow for comparatively high intensity development, the city has achieved less than half the required units in the past six years as is allocated for the next seven years. There is little evidence that the market can or will build the housing that would be expected under the draft ABAG allocations. If the housing is not being planned in areas where it is comparatively easy to build, and the market does not accommodate housing at a sufficient rate in existing built-up cities, the net result is insufficient regional housing production relative to need.

City of Clayton, letter, 1/3/2007
The City is generally supportive of the factors included in the draft methodology. However, the city is concerned that the rapid increase in construction costs for planned transit lines and stations may mean that some planned transit facilities are not constructed. For this reason, the city proposes that the two factors related to transit be changed to include only existing transit and transit under construction.

Executive Board Discussion and Public Comments

The following is an excerpt from the November 16th meeting of the ABAG Executive Board where the draft methodology was first released for public comment.

HOUSING METHODOLOGY COMMITTEE RECOMMENDATIONS

Immediate Past President Haggerty recognized Mr. Fassinger, Kenneth Kirkey, ABAG Interim Planning Director, and Christy Riviere, ABAG Senior Regional Planner, who presented a report on the Housing Methodology Committee recommendations including an overview of issues and the methodology.

Staff reported that the Board is asked to release a draft RHNA Methodology which will commence a 60-day public comment period leading to the January 18, 2007 Executive Board meeting. The state mandates that councils of governments allocate the regional housing numbers provided by the state to the region's jurisdictions. The housing numbers include the number for the entire region separated into four categories that represent the needs of households at all income levels. The RHNA statutory objectives are grouped into four primary categories: increasing housing supply, affordability, and housing types; encouraging efficient development and in-fill; promoting jobs-housing balance; and reducing concentrations of poverty. The Housing Methodology Committee (HMC) was established in May to assist staff in developing a recommended methodology. The RHNA process includes adoption of a draft allocation methodology and a 60-day comment period.

The HMC developed weighted methodology factors, calculated based upon a regional share, including household growth at 40 percent, employment growth at 20 percent, existing employment at 20 percent, household growth near transit at 10 percent, and employment growth near transit at 10 percent. The HMC concluded that this will assign more housing need to existing areas that have transit, existing employment, and anticipated employment growth, and will place housing more in urban and in-fill locations and less in rural communities.

The remaining items that go into the allocation methodology, in addition to the weighted methodology factors, are regional income allocation, spheres of influence, transfer of units, and subregions.

Executive Director Gardner reminded the Board that the Housing Methodology Committee included elected officials, city managers, planning directors, county representatives, and non-governmental organizations, and that the recommendations from the HMC were reached by consensus.

Members commented on factors such as crime, poverty, and infrastructure that occur with growth.

Members heard the following public comments:

Julie Pierce, Councilmember, City of Clayton, who served on the HMC and is a member of the Regional Planning Committee, stated a concern about addressing jurisdictions that have grown exponentially in the past but which will be growing slower in the future. While transit is planned, the amount of money for E-BART is less than a quarter of what is needed to build the line; it will not happen during this planning period. MTC's planned transit, if not fully funded under contract, is unrealistic to include in the methodology. The methodology accomplishes the Regional Blueprint objective to shift new growth from the

sprawl at the fringes and back towards transit and the center cities. She recommended that the Board adopt the policy using only existing transit.

Andrew Smith, Senior Planner, City of Walnut Creek, stated the city's support of staff's recommendation regarding housing allocations assignment within the spheres of influence to jurisdictions with actual land use control within that area. He noted concerns about calculating walking distance from transit fare gates and opportunity sites identified by each city's general plan when determining projected growth near transit.

Matt Walsh, representing the County of Solano and a HMC member, stated the county's support of the draft methodology as recommended.

Tina Wehrmeister, Community Development, City of Antioch, stated a concern about factoring planned transit in the methodology without guaranteed funding for those transit improvements and which may not be built during the next RHNA cycle. She stated support for the equal share allocation of units based on affordability. She encouraged the Board and staff to work with the state to acknowledge market realities to obtain a realistic regional need.

William Shinn, Councilmember, City of Concord, stated general support for the methodology and concern about the 10 percent factor for housing near transit, particularly for land near the northern BART station adjacent to the Concord Weapons Naval Station. He asked staff to confirm that this property is not included in the calculation.

Paul Kermoyan, City of Sausalito, stated the city's support for the proposal and recognized the county's position about sharing between the numbers generated within the unincorporated spheres of influence (SOI) and the incorporated areas. The incorporated areas have reached consensus among electeds that that area generated within the unincorporated SOIs should be assigned back to the county.

Paul Cohen, Councilmember, City of San Rafael, stated agreement with the recommendation and endorsed the HMC recommendation that Marin join Alameda and Contra Costa Counties in retaining the housing allocation for unincorporated areas as the county's responsibility.

L. B. "Kyle" Keilman, resident of San Rafael, stated that very few people in the general public of the Bay Area know what was going on in the room. He read from an article in the Twin Cities Times about impacts of establishing a train station in Larkspur. He commented on state mandated development.

Alex Hinds, Community Development Agency Director, County of Marin, commented on spheres of influence and the current distribution of 75 percent to cities and 25 percent to the county. He commented on the Board of Supervisors and LAFCO agreement to continue that approach. He stated that Marin County has a long history of city-centered development, and suggested a shared responsibility and a third category.

Brad Nix, Mayor, City of Oakley, commented on working with HCD and stated a concern about using transit that is planned but unfunded.

Jeffrey Levin, Housing Policy and Programs Coordinator, City of Oakland, stated agreement with the overall goals of the RHNA exercise and concerns about the use of formulas shifting need figures to the three large core cities in the region. He commented on whether the market will build these units, the adequacy of the income allocation, and the statutory requirement to assign lower proportions of need in areas with disproportionately higher concentrations of low income.

Larry Chu, Mayor, City of Larkspur, stated the city's support of the county taking 100 percent of the sphere of influence numbers. He noted that in-fill will take longer than the period projected. He requested better understanding of calculations.

Immediate Past President Haggerty noted that the Board would be releasing the methodology for comments and that the issue of planned transit should be revisited based on current funding for transit.

Supervisor Adams commented on spheres of influence, shared responsibility between the county and cities, and the process in Marin County called dual annexation. She stated that Marin LAFCO has gone through a very deliberative process to remove those areas from the sphere of influence of cities and towns that don't make sense. She moved the recommendation from staff to start the 60-day process with an amendment to add a number three on page 13, on sphere of influence, that Marin County be allowed to continue its shared allocation.

Immediate Past President Haggerty recognized a motion by Supervisor Adams, and seconded by Mayor Green, to approve the resolution on the RHNA Methodology with the amendment adding a number three on page 13 to allow Marin County to continue its shared allocation.

Forrest Williams, Councilmember, City of San Jose, commented on historic jobs/housing imbalance and adjustments in San Jose.

Deputy Director Shoemaker commented on the regional fair share housing process, smart growth, the relationship between the regional transportation plan process and the allocation methodology, and zoning.

Immediate Past President Haggerty recognized a substitute motion by Deputy Director Shoemaker, and seconded by Chris Daly, Supervisor, City and County of San Francisco, to adopt a methodology that strikes the last two factors related to transit weighted criteria which adjust the percentage distribution to 50 percent, 25 percent, and 25 percent.

Members discussed testing formulas and shifting units between jurisdictions; the concentration of poverty; urban growth boundaries; funding needed to build housing units; the HMC process; general plans; the 60-day public comment period and the final methodology; a need for a reasonable allocation from HCD; urban sprawl; capping allocations to unincorporated areas; the Joint Policy Committee and the relationship between transportation and housing; developing agricultural lands; and household and job growth near transit.

Supervisor Adams requested that the substitute motion be amended to include the amendment in the original motion. The amendment was accepted as part of the substitute motion.

On the substitute motion to adopt a methodology that strikes the last two factors related to transit weighted criteria which adjust the percentage distribution to 50 percent, 25 percent, and 25 percent – the substitute motion failed.

On the main motion to approve the resolution on the RHNA Methodology with the amendment adding a number three on page 13 to allow Marin County to continue its shared allocation, the ayes were 14 and the nays were six. The motion passed.

Regional Planning Committee Discussion

The following summarizes the committee discussion about the draft methodology that occurred at the December 6th meeting of the ABAG Regional Planning Committee (RPC).

Joseph Perkins, President & CEO, Home Builders Association of Northern California:
Weighting the allocation formula toward communities with transit creates a disincentive for communities that don't want housing. To avoid a higher housing allocation, a community might choose not to plan for transit in the future.

Nancy Nadel, Councilmember, City of Oakland:
There is no factor for assigning affordable housing that takes into account a jurisdiction's existing concentration of poverty, and that is a big problem for Oakland. It is not enough to focus on doing the right thing in the future without responding to what has happened in the past and the situation that already exists.

Scott Haggerty, Supervisor, Alameda County:
It is unfair to include planned transit in the allocation methodology. Many transit projects have escalated in cost, and we must be realistic about how much transit might get built.

Julie Pierce, Councilmember, City of Clayton:
The issue we will have to deal with next is the how we implement whatever solution we come up with, to actually get things built. That could include directing financial resources to reward those jurisdictions that receive higher allocations. The committee has a strong interest in continuing to look at implementation strategies that will help us to reach these numbers. At some point this committee is going to be the one that is going to be talking about do we have the water and energy and everything else for all of those units that are projected.

Gwen Regalia, Councilmember, City of Walnut Creek:
I think most of us are very willing to try to provide housing for low and very low income households. But many communities like Walnut Creek don't have large social service support systems. It is harder to provide those services that people really need, although communities like ours have spent the last 25 years trying to expand the services provided by non-profit agencies. It is tough to be poor in a more wealthy community, and it often means that people who do not have transportation options have to get to Martinez or Concord or Richmond to take advantage of what is available there. Our community should be trying to provide these services, but I want to point out that there are other points of view that have to be considered as people try to do the right thing.

Mark Green, Mayor, City of Union City:
I just want to reiterate that we are in a 60-day commentary period about the methodology. We should work to get the word out so that people have an opportunity to have input into the process.