



2023-2031

# HOUSING ELEMENT

Town of Danville

## Appendix D-2

Part Two: Inventory of Sites Supplement



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# 1. Danville RHNA Appeal Request

It is important to note that the Town of Danville submitted an appeal request for the 2023-2031 Regional Housing Needs Assessment (RHNA) Allocation. In July 2021, the Town of Danville requested a substantial decrease in its RHNA Allocation from 2,241 units to 600-800 units—a 64% to 73% reduction. The Town’s RHNA appeal document cites numerous issues with ABAG and RHNA as justification for decreasing its required unit allocation. In brief, issues cited by Danville Town staff include:

- ABAG failed to consider information based on the Local Jurisdiction Survey, particularly information related to existing and project jobs, housing relationships to jobs, and the availability of land suitable for urban development or for conversion to residential uses.
- ABAG failed to determine the jurisdiction’s allocation in accordance with the Final RHNA Methodology and the allocation undermined RHNA objectives. The Town also claimed that the RHNA Methodology fails to affirmatively further fair housing as required by Government Code Section 65584(d)(5).
- Since Danville submitted its information for the Local Jurisdiction Survey, significant and unforeseen circumstances have occurred. The appeal states, for example, that the Town’s water supply is no longer an opportunity for development, but a development constraint due to drought and the effects of the pandemic were not considered.

Town staff further criticized RHNA as a “historic methodology anomaly” that is flawed because “external forces—including the economy, construction labor costs, and land prices—have far greater impact on housing production than RHNA, city practices or public policies.”<sup>1</sup>

After reviewing the appeal request, ABAG staff submitted to their responses and recommendation for action to the ABAG Administrative Committee and Town staff. In the September 2021 document, staff recommended that the committee deny Danville’s appeal as many issues raised were not sufficient basis for appeal, the Final RHNA Methodology considered local trends and patterns in Danville (e.g., jobs-housing relationship), the Methodology follows and addresses statutory requirements (e.g., household growth, regional transportation plans), and forecasts feasible growth within urban growth boundaries.<sup>2</sup>

## Census Tract Sites Analysis

Figure 1 shows all Census Tracts in the Town of Danville, the proportion of the population that identifies as Hispanic, the non-White share of the population, the share of low and moderate income households, the number of R/ECAPS and RCAAs, TCAC’s opportunity score, and the number of units by income proposed in the tract. The Town of Danville’s proposed RHNA sites can accommodate approximately 3,075 new units. The majority of proposed units (68%) are in Census Tract 3452.03, which is located in west Danville between Interstate 680 and the Town boundary. This Census Tract includes Downtown Danville, access to public transportation, San Ramon Valley High School, community gathering spaces (e.g., St. Isidore Catholic Church, Danville Women’s Club), and neighborhood amenities.

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1 <https://danvilletowntalks.org/11210/widgets/32929/documents/21827>.

2 <https://danvilletowntalks.org/11210/widgets/32929/documents/24443>.

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## Census Tract 3451.13

**Characteristics:** Census Tract 3451.13 is located in southeast Danville between Camino Tassajara and the border of the City of San Ramon. This Census Tract is a low density area containing the Sycamore Valley Open Space and predominantly single family residential housing. RHNA sites in this tract are primarily located in the western area of the tract between single family subdivisions to the west and Sherburne Hills to the west. The area is primarily greenspace. There is also a cluster of sites along Camino Tassajara within this Census Tract. Generally, the Census Tract is an area of high opportunity according the TCAC's opportunity areas and contains a low share of low or moderate income households (13% of households in the Tract). Nearly 40% of the population in this Tract are non-White and 7% identify as Hispanic. Finally, the Tract is not an R/ECAP and is rated as stable or advanced exclusive under the Urban Displacement designations. This Census Tract, and the entire Town, is an RCAA.

**Assessment:** The addition of 200 RHNA units including 56 for low and very low income households would increase integration in the Town of Danville by increasing the share of low income households in this high opportunity Census Tract. Neighborhoods in this area are established and unaffordable to low- or moderate-income households—characterized by advanced exclusive by the Urban Displacement definitions. The addition of 7% of the Town's total RHNA allocation within this Census Tract would provide the opportunity for low and moderate income households in the region to access this high resource area. Additionally, the introduction of affordable units in this RCAA will further integrate the Town racially and economically by creating opportunity in this concentrated area of race and affluence.

**Considerations:** Propose 73 RHNA units in Census Tract 3451.13 for low and moderate income households and 126 units for above moderate income households.

## Census Tract 3451.14

**Characteristics:** Census Tract 3451.14 is located in south central Danville between Camino Tassajara, Interstate 680, and the border of the City of San Ramon. This Census Tract is a low density area containing the Osage Station Park, Crow Canyon Country Club, and predominantly single family residential housing. RHNA sites in this tract are primarily located in the eastern area of the tract between single family subdivisions to the west and Sherburne Hills to the west. The proposed RHNA sites are primarily greenspace. Generally, the Census Tract is an area of high opportunity according the TCAC's opportunity areas and contains a low share of low or moderate income households (18% of households in the Tract). About one in four (27%) of the population in this Tract are non-White and 7% identify as Hispanic. Finally, the Tract is not an R/ECAP and is rated as stable or advanced exclusive under the Urban Displacement designations. This Census Tract, and the entire Town, is an RCAA.

**Assessment:** The addition of 104 RHNA units including 33 for low and very low income households would increase integration in the Town of Danville by increasing the share of low income households in this high opportunity Census Tract. Neighborhoods in this area are established and unaffordable to low or moderate income households—characterized by advanced exclusive by the Urban Displacement definitions. The addition of 3% of the Town's total RHNA allocation within this Census Tract would provide the opportunity for low and moderate income households in the region to access this high resource area. Additionally, the introduction of affordable units in this RCAA will further integrate the Town racially and economically by creating opportunity in this concentrated area of race and affluence.

**Considerations:** Propose 44 RHNA units in Census Tract 3451.14 for low and moderate income households and 60 units for above moderate income households.

## Census Tract 3452.02

**Characteristics:** Approximately half of Census Tract 3452.02 is located in southwest Danville on the western side of Interstate 680 and the border of the City of San Ramon. This Census Tract is a low density area containing office

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uses along I-680, portions of Las Trampas Regional Wilderness, and predominantly single family residential housing. RHNA sites in this tract are scattered throughout with a handful of sites bordering wilderness areas in the south and additional sites in the north end of the tract near the I-680 and Camino Tassajara interchange. Generally, the Census Tract is an area of high opportunity according to the TCAC's opportunity areas and contains a moderate share of low or moderate income households (20% of households in the Tract). The Tract is tied as the second most racially diverse Tract in the Town of Danville with 46% of the population identified as non-White and 10% identified as Hispanic. Additionally, this Census Tract is not yet Advanced Exclusive, but is at risk of becoming exclusive according to the Urban Displacement definitions. All other Census Tracts in the Town of Danville are already Advanced Exclusive. This Census Tract, and the entire Town, is an RCAA. Finally, the Tract is not an R/ECAP.

**Assessment:** The addition of 146 RHNA units including 59 for low and very low income households would increase integration in the Town of Danville by increasing the share of low income households in this high opportunity Census Tract, and stabilize this Census Tract from experiencing further displacement and becoming exclusive. Neighborhoods in this area are established but relatively accessible to moderate income households—characterized by at risk of becoming exclusive by the Urban Displacement definitions. The addition of 5% of the Town's total RHNA allocation within this Census Tract would provide the opportunity for low and moderate income households in the region to access this high resource area and stabilize existing low or moderate income households living in the Census Tract to prevent displacement. Additionally, the introduction of affordable units in this RCAA will further integrate the Town racially and economically by creating opportunity in this concentrated area of race and affluence.

**Considerations:** Propose 82 RHNA units in Census Tract 3452.02 for low and moderate income households and 64 units for above moderate income households.

## Census Tract 3452.03

**Characteristics:** Approximately half of Census Tract 3452.03 is located in western Danville between Interstate 680 and the Town boundary. This Census Tract includes Downtown Danville as well as extremely low density areas to the west that border the Las Trampas Regional Wilderness Area. Downtown Danville includes access to public transportation, San Ramon Valley High School, Del Amigo High School, Montair Elementary, community gathering spaces (e.g., St. Isidore Catholic Church, Danville Women's Club), and neighborhood amenities. RHNA sites in this tract are scattered throughout with a handful of sites bordering wilderness areas in the west and the majority of sites in the east areas of the Tract near Downtown Danville, bus lines, and I-680. Generally, the Census Tract is an area of high opportunity according to the TCAC's opportunity areas and contains a moderate share of low or moderate income households (18% of households in the Tract). The Tract contains the highest concentration of people who identify as Hispanic in the Town with 11% of the population in this Tract. Twenty-eight percent of the population in this Tract are non-White. Additionally, this Census Tract is classified as Advanced Exclusive by the Urban Displacement definitions and is not an R/ECAP. This Census Tract, and the entire Town, is an RCAA.

**Assessment:** The addition of 2,083 RHNA units including 962 for low and very low income households would increase integration in the Town of Danville by increasing the share of low income households in this high opportunity Census Tract. Neighborhoods in this area are established and unaffordable to low or moderate income households—characterized by advanced exclusive by the Urban Displacement definitions. The addition of 68% of the Town's total RHNA allocation within this Census Tract would provide the opportunity for low and moderate income households in the region to access this high resource area. Additionally, the introduction of affordable units in this RCAA will further integrate the Town racially and economically by creating opportunity in this concentrated area of race and affluence.

**Considerations:** Propose 1,272 RHNA units in Census Tract 3452.03 for low and moderate income households and 811 units for above moderate income households.

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## Census Tract 3462.01

**Characteristics:** Approximately one third of Census Tract 3462.01 is located in northern Danville between Interstate 680, Diablo Road, and the Town boundary. This Census Tract includes Monte Vista High School, Los Cerros Middle School, Green Valley Elementary, places of worship, and primarily low density housing. RHNA sites in this tract are primarily located in the western area near I-680 with one site in the eastern area near the High School on the Town's border. Generally, the Census Tract is an area of high opportunity according to the TCAC's opportunity areas and contains a moderate share of low or moderate income households (16% of households in the Tract). The Census Tract has a low share of residents who are non-White (29%) and 8% of the population identifies as Hispanic. Additionally, this Census Tract is classified as Advanced Exclusive by the Urban Displacement definitions and is not an R/ECAP. This Census Tract, and the entire Town, is an RCAA.

**Assessment:** The addition of 212 RHNA units including 91 for low and very low income households would increase integration in the Town of Danville by increasing the share of low income households in this high opportunity Census Tract. Neighborhoods in this area are established and unaffordable to low or moderate income households—characterized by advanced exclusive by the Urban Displacement definitions. The addition of 7% of the Town's total RHNA allocation within this Census Tract would provide the opportunity for low and moderate income households in the region to access this high resource area. Additionally, the introduction of affordable units in this RCAA will further integrate the Town racially and economically by creating opportunity in this concentrated area of race and affluence.

**Considerations:** Propose 120 RHNA units in Census Tract 3462.01 for low and moderate income households and 92 units for above moderate income households.

## Census Tract 3462.03

**Characteristics:** Census Tract 3462.03 is located in the center of Danville between Interstate 680 to the west, El Cerro Boulevard and Camino Tassajara to the north and east, and Sycamore Valley Road to the south. This Census Tract includes primarily single family residential areas with limited commercial uses at the interchange of I-680 and Diablo Road. RHNA sites in this tract are located along the southern border on Camino Tassajara and the northern border along El Cerro Boulevard. Generally, the Census Tract is an area of high opportunity according to the TCAC's opportunity areas and contains a low share of low or moderate income households (14% of households in the Tract). About one in four (25%) of the population in this Tract are non-White and 8% identify as Hispanic. Additionally, this Census Tract is classified as Advanced Exclusive by the Urban Displacement definitions and is not an R/ECAP. This Census Tract, and the entire Town, is an RCAA.

**Assessment:** The addition of 263 RHNA units including 122 for low and very low income households would increase integration in the Town of Danville by increasing the share of low income households in this high opportunity and RCAA Census Tract. Neighborhoods in this area are established and unaffordable to low or moderate income households—characterized by advanced exclusive by the Urban Displacement definitions. The addition of 9% of the Town's total RHNA allocation within this Census Tract would provide the opportunity for low and moderate income households in the region to access this high resource area. Additionally, the introduction of affordable units in this RCAA will further integrate the Town racially and economically by creating opportunity in this concentrated area of race and affluence.

**Considerations:** Propose 161 RHNA units in Census Tract 3462.03 for low and moderate income households and 102 units for above moderate income households.

## Census Tract 3462.04

**Characteristics:** Census Tract 3462.04 is located in the northeast area of Danville between Camino Tassajara and the Town boundary. This Census Tract includes primarily single family residential areas and hilly open space.

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RHNA sites in this tract are located in the center where there is open greenspace. Generally, the Census Tract is an area of high opportunity according to the TCAC's opportunity areas and contains the lowest share of low or moderate income households in the Town (11% of households in the Tract). About one in three (32%) of the population in this Tract are non-White and 8% identify as Hispanic. Additionally, this Census Tract is classified as Advanced Exclusive by the Urban Displacement definitions and is not an R/ECAP. This Census Tract, and the entire Town, is an RCAA.

**Assessment:** The addition of 48 RHNA units including 0 for low and very low income households would maintain current patterns in the Town of Danville by increasing the available units in this high opportunity and RCAA Census Tract. Neighborhoods in this area are established and unaffordable to low or moderate income households—characterized by advanced exclusive by the Urban Displacement definitions. The addition of 2% of the Town's total RHNA allocation within this Census Tract would have a minimal impact on existing patterns of integration and segregation in the Town.

**Considerations:** Propose 0 RHNA units in Census Tract 3462.04 for low and moderate income households and 48 units for above moderate income households.

## Census Tract 3551.14

**Characteristics:** Census Tract 3551.14 is located in southeast Danville between Camino Tassajara and the Town's border with the City of San Ramon. This Census Tract includes primarily single family residential areas and a community shopping center with groceries, a convenience store, and restaurants. RHNA sites in this tract scattered throughout. Generally, the Census Tract is an area of high opportunity according to the TCAC's opportunity areas and contains a very low share of low or moderate income households in the Town (12% of households in the Tract). Nearly half (46%) of the population in this Tract are non-White and 10% identify as Hispanic. Additionally, this Census Tract is classified as Advanced Exclusive by the Urban Displacement definitions and is not an R/ECAP. This Census Tract, and the entire Town, is an RCAA.

**Assessment:** The addition of 14 RHNA units including 0 for low and very low income households would maintain current patterns in the Town of Danville. The addition of less than one percent of the Town's total RHNA allocation within this Census Tract would have a minimal impact on existing patterns of integration and segregation in the Town.

**Considerations:** Propose 0 RHNA units in Census Tract 3551.14 for low and moderate income households and 14 units for above moderate income households.

## Census Tract 3551.16

**Characteristics:** A very small portion of Census Tract 3551.16 is located in southeast Danville along the Town's border with the City of San Ramon. This Census Tract includes a handful of low density single family properties. There is one RHNA site in this Tract. Generally, the Census Tract is an area of high opportunity according to the TCAC's opportunity areas and contains a low share of low or moderate income households in the Town (17% of households in the Tract). More than three out of four (78%) of the population in this Tract are non-White and 5% identify as Hispanic. Additionally, this Census Tract is classified as Advanced Exclusive by the Urban Displacement definitions and is not an R/ECAP. This Census Tract, and the entire Town, is an RCAA.

**Assessment:** The addition of four RHNA units within this Census Tract would have a minimal impact on existing patterns of integration and segregation in the Town.

**Considerations:** Propose 0 RHNA units in Census Tract 3551.16 for low and moderate income households and 4 units for above moderate income households.

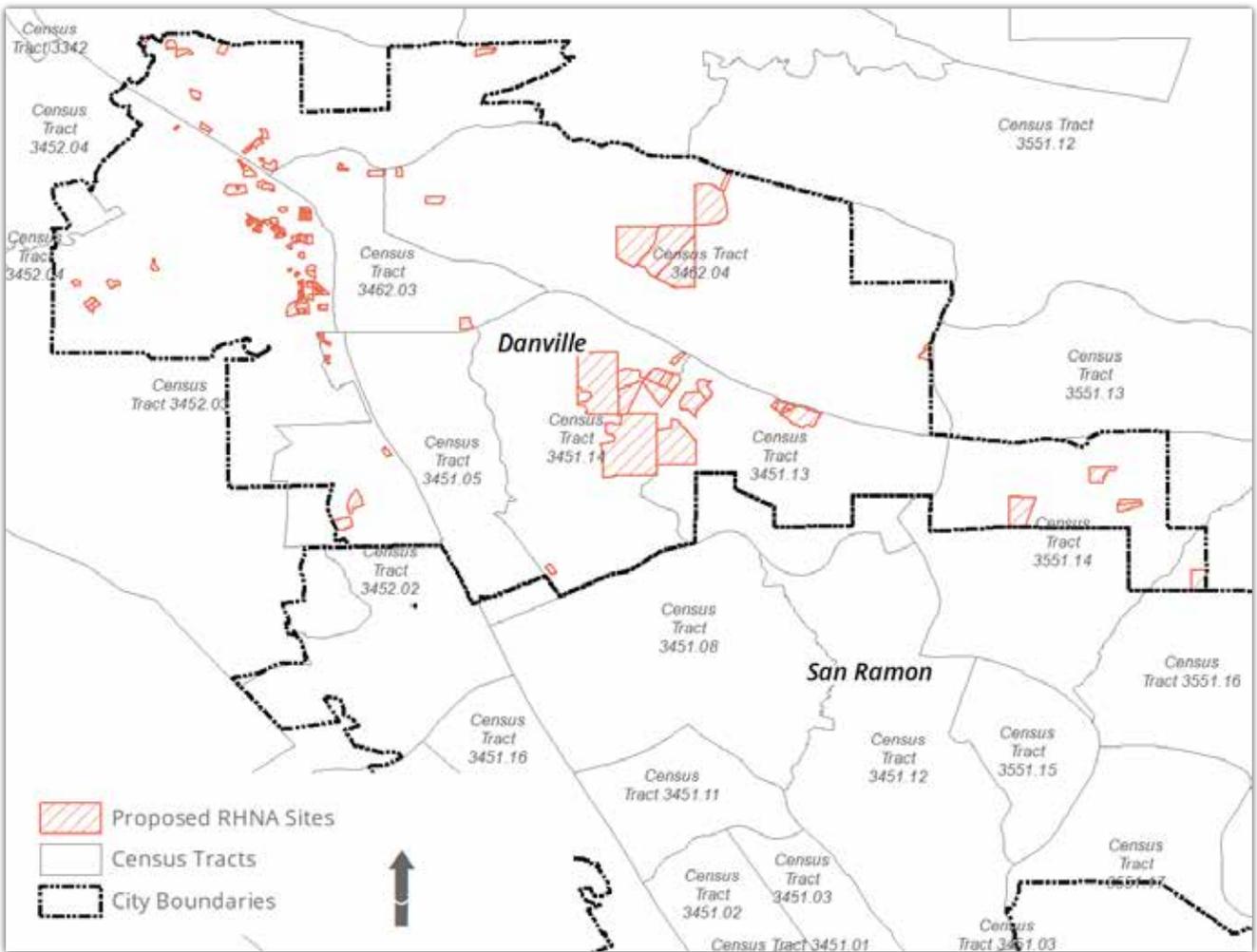
**FIGURE 1. DANVILLE PROPOSED RHNA SITES BY CENSUS TRACT SUMMARY**

Census Tract	AFFH Data							RHNA Units Proposed			
	Pct. Hispanic	Pct. Non-White	Pct. Low/Mod Income	R/ECAP	RCAA	TCAC Opportunity Areas	Urban Displacement	Very Low	Low	Moderate	Above Moderate
Census Tract 3451.13	7%	39%	13%	0	1	Highest Resource	Stable/Advanced Exclusive	36	20	18	126
Census Tract 3451.14	7%	27%	18%	0	1	Highest Resource	Stable/Advanced Exclusive	21	12	11	60
Census Tract 3452.02	10%	46%	20%	0	1	Highest Resource	At Risk of Becoming Exclusive	36	23	23	64
Census Tract 3452.03	11%	28%	18%	0	1	Highest Resource	Stable/Advanced Exclusive	600	362	310	811
Census Tract 3462.01	8%	29%	16%	0	1	Highest Resource	Stable/Advanced Exclusive	58	33	29	92
Census Tract 3462.03	8%	25%	14%	0	1	Highest Resource	Stable/Advanced Exclusive	77	45	39	102
Census Tract 3462.04	8%	32%	11%	0	1	Highest Resource	Stable/Advanced Exclusive	0	0	0	48
Census Tract 3551.14	10%	46%	12%	0	1	Highest Resource	Stable/Advanced Exclusive	0	0	0	14
Census Tract 3551.16	5%	78%	17%	0	1	Highest Resource	Unavailable or Unreliable Data	0	0	0	4

Source: HCD AFFH Data Viewer and Root Policy Research.



**FIGURE 2. DANVILLE CENSUS TRACT MAP**



Source: HCD AFFH Data Viewer and Root Policy Research.



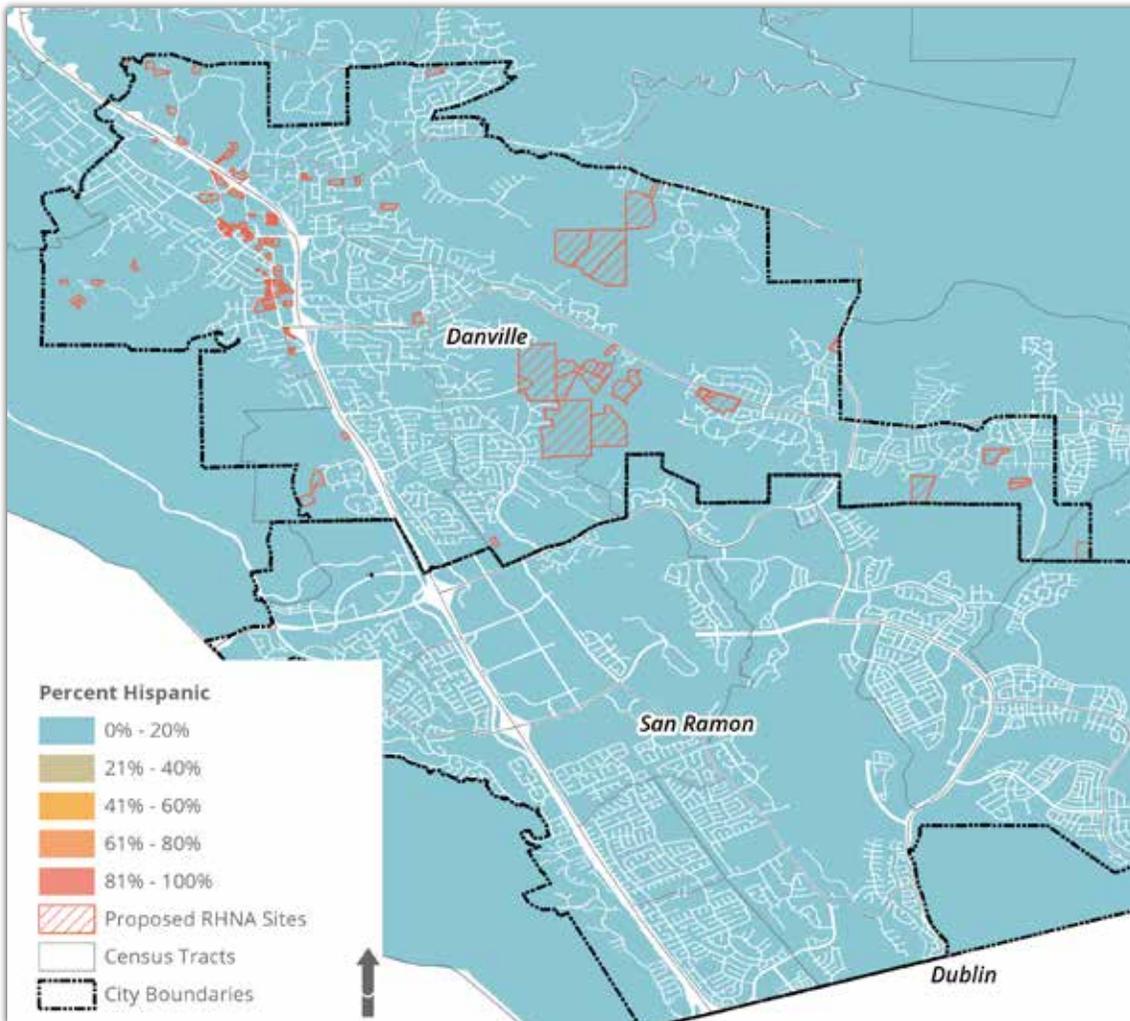
## Supportive Citywide Spatial Analysis

The following series of maps provide the location of proposed Danville RHNA sites overlaid on demographic and fair housing data provided in HCD's AFFH data viewer.

### Hispanic Population

Figure 3 shows Danville's RHNA sites overlaid with the percent Hispanic for each Census Tract in the Town. All Census Tracts in the Town of Danville have below 20% Hispanic population. The sites are evenly distributed geographically throughout the Town with an emphasis on locating units near high access to public services, transportation, and opportunity. Census Tract 3452.03 has the highest share of Hispanic residents (11%) and is the location of 68% of the proposed RHNA units. This area is also home to Downtown Danville, access to transit, and community amenities.

**FIGURE 3. DANVILLE PROPOSED RHNA SITES, PERCENT HISPANIC, 2019**

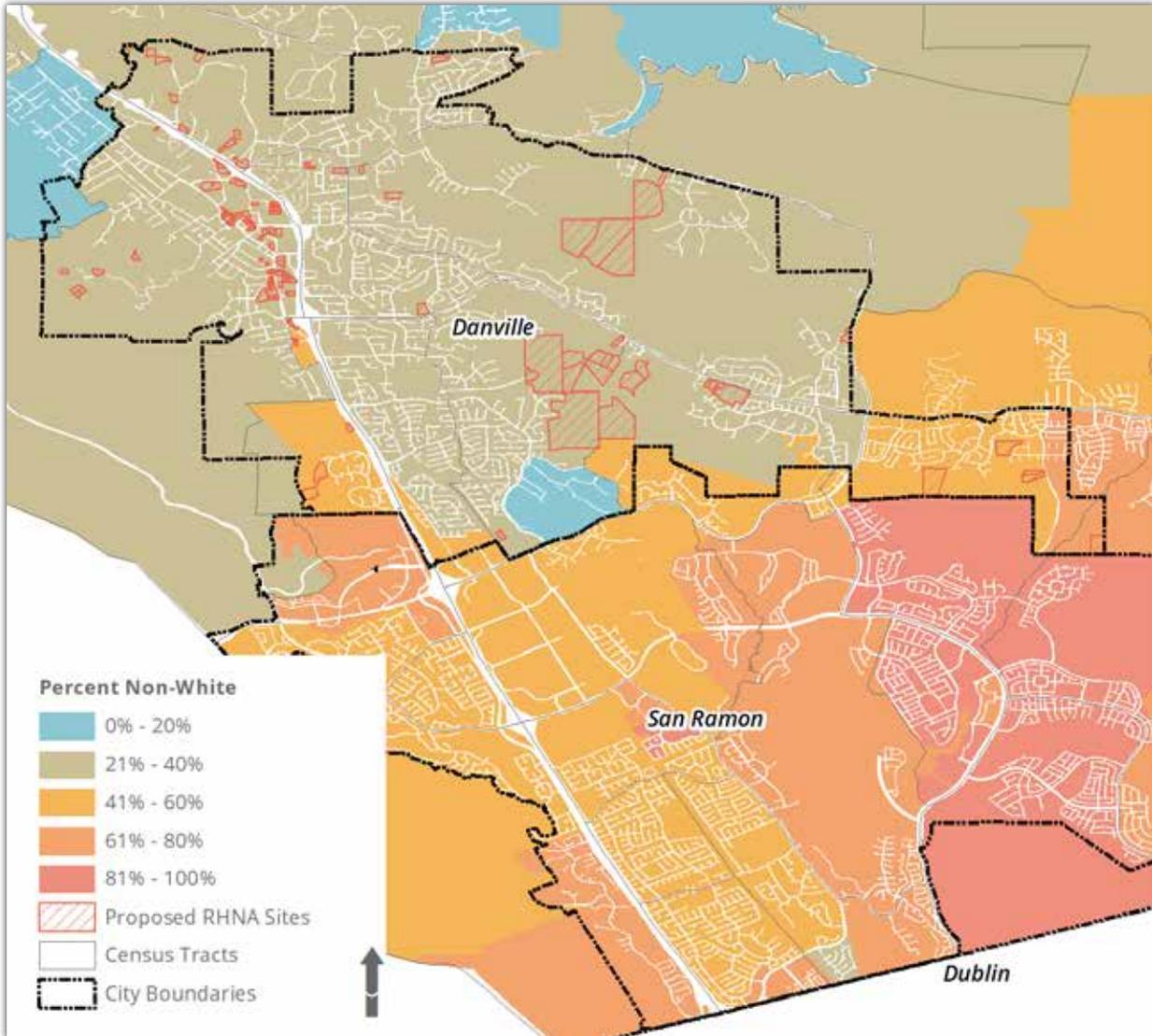


Source: HCD AFFH Data Viewer and Root Policy Research.

## Non-White Population

Figure 4 shows Danville's RHNA sites overlaid with the percent non-White for each Census Tract in the Town. The majority of the Town of Danville is between 21% and 40% non-White, except for Census Tracts that border on the City of San Ramon. Census Tracts 3452.02, 3551.14, and 3551.16 that border the City of San Ramon have higher shares of the population that identify as non-White (greater than 40%). Five percent of the Town's proposed RHNA units are located in these Census Tracts. The small proportion of units proposed for these areas will likely have no significant impact on established patterns of integration and segregation.

**FIGURE 4. DANVILLE PROPOSED RHNA SITES, PERCENT NON-WHITE, 2019**

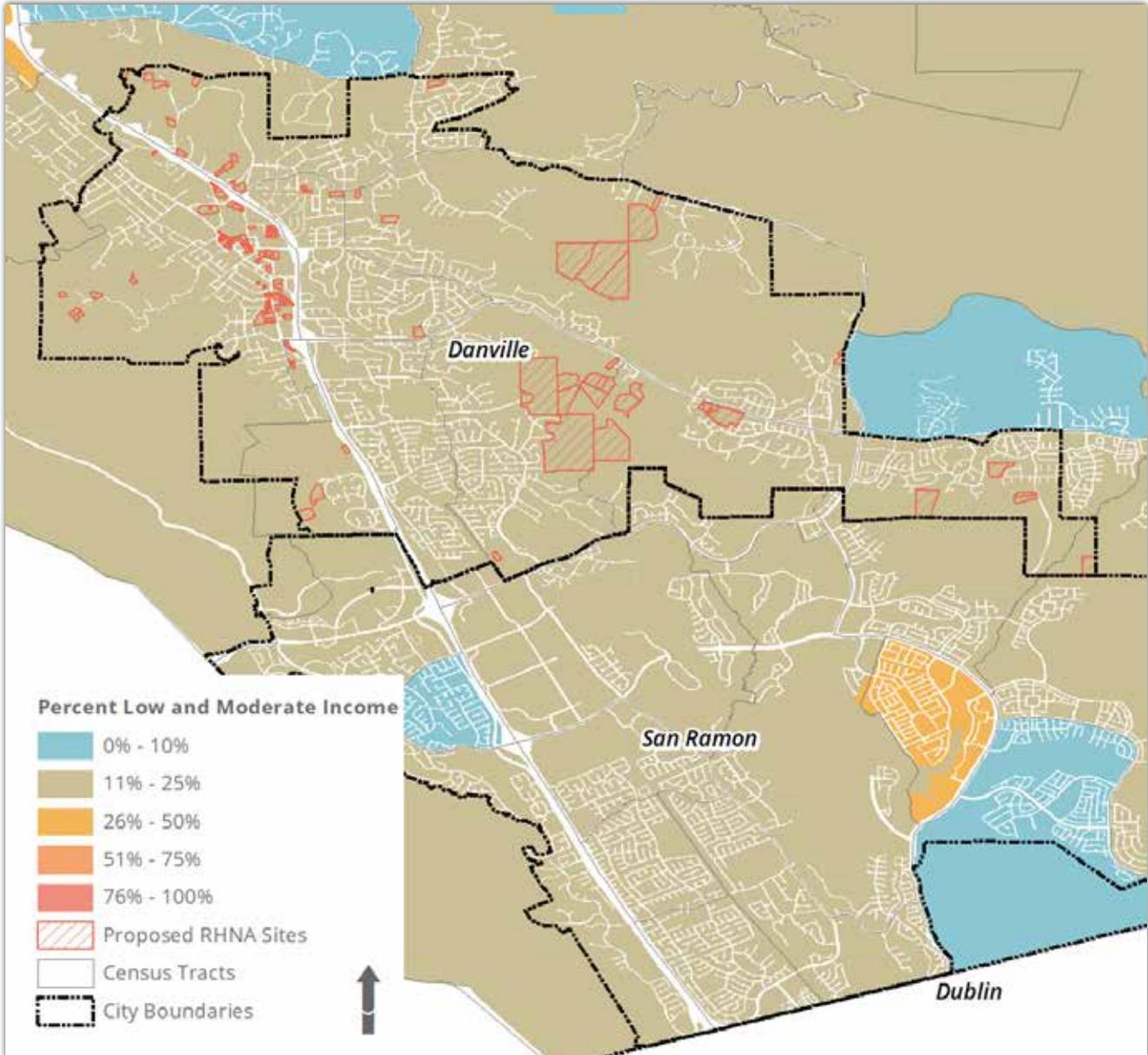


Source: HCD AFFH Data Viewer and Root Policy Research.

## Low and Moderate Income

Figure 5 shows Danville's RHNA sites overlaid with the percent low and moderate income for each Census Tract in the Town. All census Tracts in the Town of Danville have a relatively low share of low and moderate income households between 11% and 25%. Census Tract 3452.02 has the highest share of low and moderate income households in the Town and 5% of the proposed RHNA units. Overall, the Town of Danville is a high income community and the allocation of low and moderate income RHNA units will provide additional opportunities for households in the region to live in Danville.

**FIGURE 5. DANVILLE PROPOSED RHNA SITES, PERCENT LOW AND MODERATE INCOME, 2019**

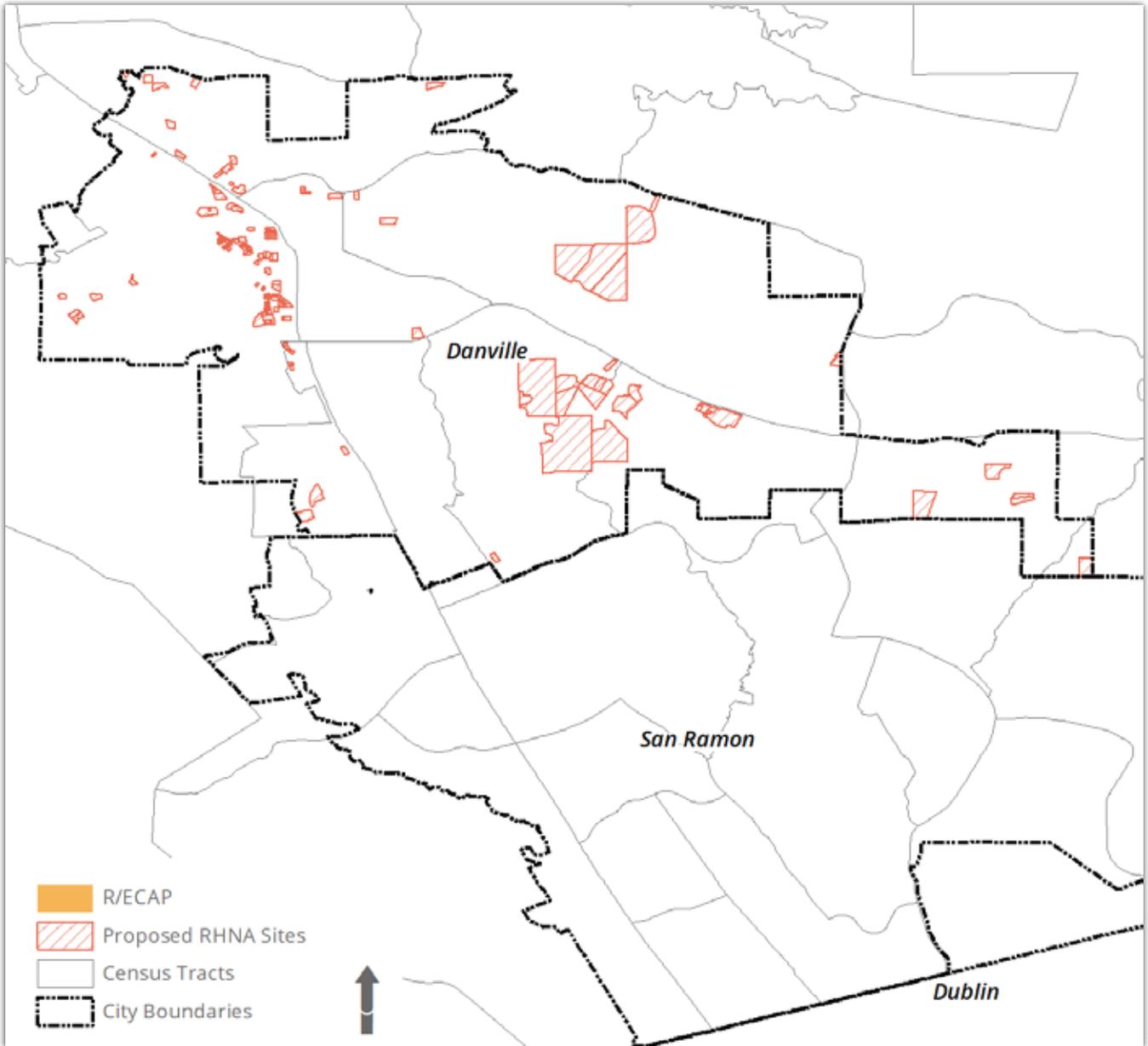


Source: HCD AFFH Data Viewer and Root Policy Research.

## Racially or Ethnically Concentrated Areas of Poverty (R/ECAP)

Figure 6 shows Danville's RHNA sites overlaid with the R/ECAPS. As shown in the figure, there are no R/ECAPS in the Town of Danville.

**FIGURE 6. DANVILLE PROPOSED RHNA SITES, RACIALLY/ETHNICALLY CONCENTRATED AREAS OF POVERTY(R/ECAP), 2019**

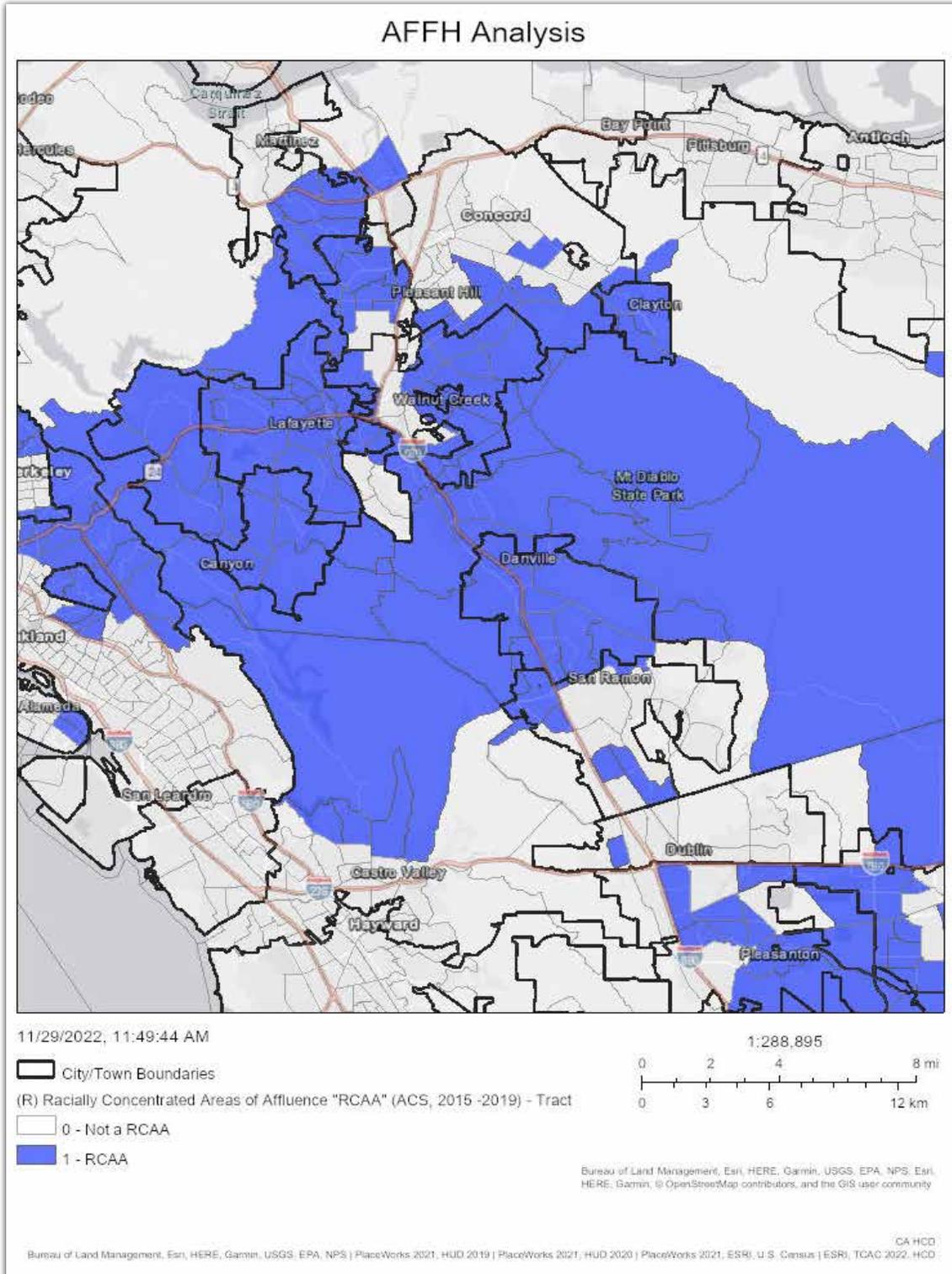


Source: HCD AFFH Data Viewer and Root Policy Research.

## Racially Concentrated Areas of Affluence (RCAA)

Figure 7 shows RCAAs in Danville. As shown in the figure, the entire Town of Danville is located in an RCAA. Therefore, all of RHNA units are proposed in an RCAA and will provide access to affluent neighborhoods in Danville for low and moderate income households.

**FIGURE 7. RACIALLY CONCENTRATED AREAS OF AFFLUENCE (RCAA) BY CENSUS TRACT, DANVILLE, 2015-2019**

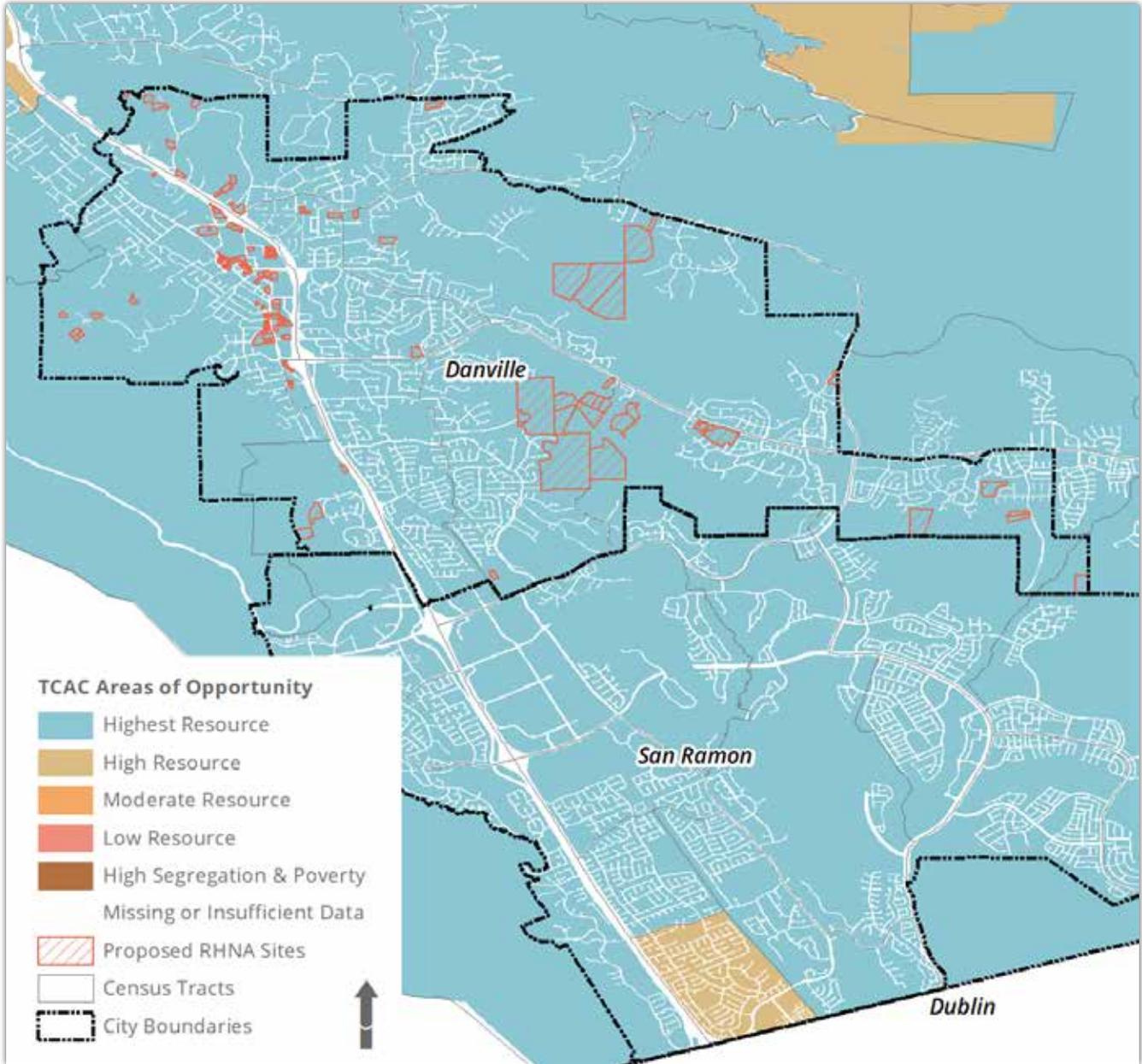


Source: California Department of Housing and Community Development AFFH Data Viewer

## TCAC Areas of Opportunity

Figure 8 shows Danville’s RHNA sites overlaid with TCAC’s Areas of Opportunity. As shown in the figure, the entire Town of Danville is classified as a “Highest Resource” area. The addition of 3,075 RHNA units to the Town of Danville will provide increased access to resources in the Town for households in the region.

**FIGURE 8. DANVILLE PROPOSED RHNA SITES, TCAC AREAS OF OPPORTUNITY, 2019**

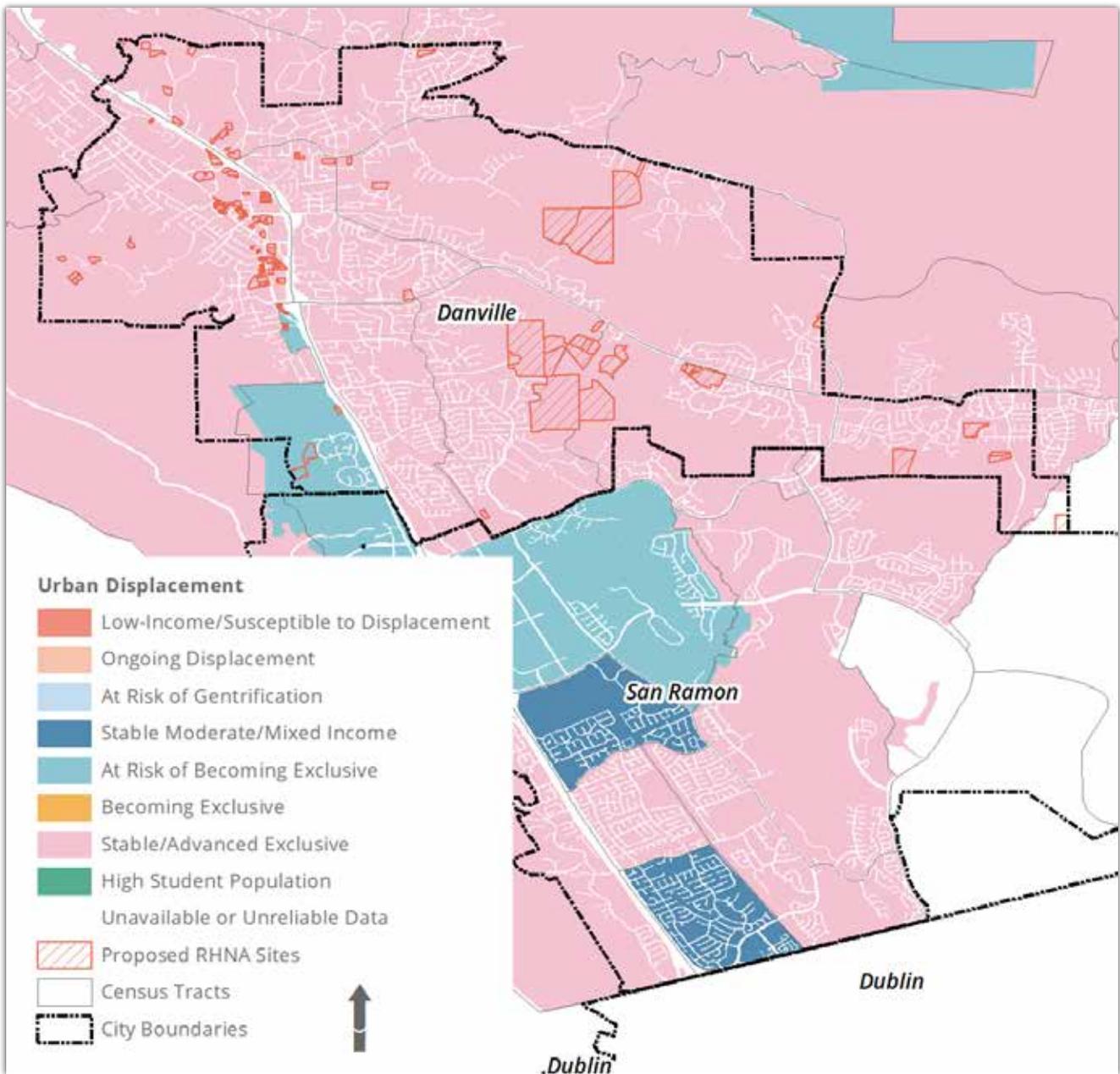


Source: HCD AFFH Data Viewer and Root Policy Research.

## Urban Displacement

Figure 8 shows Danville’s RHNA sites overlaid with the Urban Displacement classifications. As shown in the figure, there is one Tract in the Town that is at risk of becoming exclusive. Census Tract 3452.02 is located in the southwest area of the Town and borders the Wilderness Area. Five percent of RHNA units are proposed for this Census Tract which will help stabilize existing households and discourage additional displacement. The remaining areas of the Town are all classified as Stable/Advanced Exclusive meaning that low and moderate income households have minimal access to live in these neighborhoods. The introduction of 2,929 units in these neighborhoods will further integrate the Town.

**FIGURE 9. DANVILLE PROPOSED RHNA SITES, URBAN DISPLACEMENT, 2019**



Source: HCD AFFH Data Viewer and Root Policy Research.

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## Segregation and Integration

The Town of Danville predominately White with exception of the Census Tracts that border the City of San Ramon to the south. Census Tracts 3452.02, 3551.14, and 3551.16 that border the City of San Ramon have higher shares of the population that identify as non-White (greater than 40%). The RHNA sites are located equally throughout the Town and are not concentrated in areas with greater shares of racial and ethnic minorities. Five percent of RHNA units are located in the Census Tracts with populations more than 40% non-White. The vast majority of units are located in areas that are predominately white and high income. The inclusion of units in these areas will further integrate the Town of Danville racially and economically. These sites provide increased housing opportunities for all incomes and would not exacerbate concentrations of non-White households.

## Racially and Ethnically Concentrated Areas of Poverty and Affluence

None of the proposed units are within an R/ECAP. Racially Concentrated Areas of Affluence (RCAAs) are defined by HUD as communities with a large proportion of affluent and non-Hispanic White residents. The entire Town of Danville is within an RCAAs. All potential units are within an RCAA, which provide access to opportunity for residents of affordable housing and reduce existing segregation patterns. These sites provide increased housing opportunities for all incomes and would not exacerbate concentrations race and affluence.

## Disparities in Access to Opportunity

The entire Town of Danville is classified as a “Highest Resource” area. The addition of 3,075 RHNA units to the Town of Danville will provide increased access to resources in the Town for households in the region.

## Disproportionate Housing Needs

The proposed RHNA sites are evenly distributed throughout the Town of Danville and do not concentrate units in areas with greater housing problems or low income households in the Town. These sites provide increased housing opportunities for all incomes and would not exacerbate concentrations of housing problems or low income households.



