From:	Bruce Irion ███████████████
Sent:	Sunday, July 25, 2021 10:25 AM
To:	Regional Housing Need Allocation
Subject:	Support for Pleasant Hill's RHNA Appeal

I am a resident of ███████████ and working with the Pleasant Hill City on their 2040 General Plan which seeks to meet RHNA income specific housing targets. I fully support Pleasant Hill's appeal of the ABAG RHNA targets.

In researching RHNA, I found the following background information:

https://abag.ca.gov/final-rhna-methodology-2015%E2%80%932023

The income allocation method gives jurisdictions that have a relatively higher proportion of households in a certain income category a smaller allocation of housing units in that same category. For example, jurisdictions that already supply a large amount of affordable housing receive lower affordable housing allocations. This promotes the state objective for reducing concentrations of poverty and increasing the mix of housing types among cities and counties equitably.

https://abag.ca.gov/our-work/housing/rhna-regional-housing-needs-allocation

The RHNA is required to meet the five statutory objectives summarized below:

1. Increase housing supply and mix of housing types, with the goal of improving housing affordability and equity in all cities and counties within the region.
2. Promote infill development and socioeconomic equity; protect environmental and agricultural resources; encourage efficient development patterns; and achieve greenhouse gas reduction targets.
3. Improve intra-regional jobs-to-housing relationship, including the balance between low-wage jobs and affordable housing units for low-wage workers in each jurisdiction.
4. Balance disproportionate household income distributions (more high-income allocation to lower-income areas, and vice-versa)
5. Affirmatively further fair housing

Given RHNA's stated objectives to

1. Increase housing supply and mix of housing types, with the goal of improving housing affordability and equity in all cities and counties within the region;

2. Protect environmental and agricultural resources; and achieve greenhouse gas reduction targets; and
3. Improve intra-regional jobs-to-housing relationship, including the balance between low-wage jobs and affordable housing units for low-wage workers in each jurisdiction,

it makes NO SENSE that that RHNA takes a housing-centric approach while ignoring the disparity in job growth. More specifically RHNA says it recognized the need to "improve intra-regional jobs-to-housing relationship" yet it seems to focus exclusively on housing and setting targets for the distribution of income specific housing. The housing/housing distribution crisis can equally be described as a jobs/jobs distribution crisis. Yet there is no focus or assessment of jobs or a city's past efforts to manage housing and job growth. If, as Einstein said, "No problem can be solved from the same level of consciousness that created it", then this need to change! The Bay Area housing crisis was created because there was no regional jobs planning, and a regional housing plan alone will NOT solve that problem!!!

Pleasant Hill may not be perfect but they are doing a number of things right. Pleasant Hill is an actively managed and planned community for all residents. It values parks and open space, maintains its infrastructure, provides publically funded activities for all ages from children through seniors, all while being fiscally responsible. In short, I think Pleasant Hill does a great job of sustainable development and optimizing the quality of life for the maximum number of people.

RHNA's "income allocation" method giving jurisdictions that have a relatively higher proportion of households in a certain income category a smaller allocation of housing units in that same category would drive all communities toward the same housing allocation eliminating diversity and individual choice. Further, because there is no similar effort around jobs allocation, housing would be built in one city for jobs that exist in another. This would encourage, not discourage, commuting, putting further strain on transportation infrastructure and increasing carbon footprint.

If RHNA is to be consistent with its stated objectives, it should evaluate current and future job distribution at a city level and encourage cities to sustainably develop housing to meet that need. Cities should not be required to solve uncontrolled growth in San Francisco or Silicon Valley that has priced residents and employees out of the housing market.

If there is credible data to show that Pleasant Hill is not fairly treating residents who live and work in Pleasant Hill, please show it to me. And given Pleasant Hill's historical record of sustainable development of jobs to housing in their city, I do not see why Pleasant Hill should be tasked with solving problems that were created (and benefitted) cities elsewhere that did not similarly manage their development.

From:	Bruce Irion ██████████████████████
Sent:	Saturday, July 31, 2021 9:11 PM
To:	Regional Housing Need Allocation
Cc:	██
Subject:	Support for Pleasant Hill's Appeal of RHNA Housing Targets

As a resident, I am writing in support of Pleasant Hill and surrounding cities appeal of RHNA housing targets.

The methodology used by RHNA is flawed on many levels

1. It seeks to solve a problem created by failure to manage job growth and income distribution with housing mandates with no evidence to support this will work
2. I see no evidence that RHNA sought to enumerate or assess the impact of long term trends which will impact housing needs. Among these are
    1. Tele-commuting and remote learning that will allow redistribution of jobs and associated housing needs
    2. Shift to e-commerce and away from brick and mortar stores that will open properties for redevelopment and reduce the number of lower income service jobs
    3. Automation that will reduce the number of service jobs,
3. Instituting a housing solution to a problem created by failure to plan and manage job, income, and housing growth rewards cities that did little to manage and benefited from the tax base of such growth at the expense of cities such as Pleasant Hill who have a history of managing growth, preserving open space, and maintaining the environment. Further the failure to address the job and income distribution that led to the problem will only perpetuate future disparity.
4. RHNA's "income allocation" method giving jurisdictions that have a relatively higher proportion of households in a certain income category a smaller allocation of housing units in that same category will drive all communities toward the same housing. This will eliminate diversity and individual choice and shows no respect for the unique character of cities within the Bay Area. In the words of Malvina Reynolds "and they were all made out of ticky-tacky and they all looked just the same".

It's time to rethink the approach here and not to penalize housing communities for the problems created by failure to manage jobs and income distribution created in cities who put growth and tax revenues above quality of life for their residents.

Bruce Irion

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cc: Bill Dodd
     Tim Grayson

Karen Mitchoff - ██████████████████████
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Pleasant Hill Planning Commission