

Fwd: Bay Area housing plan

Sun 10/25/2020 4:23 PM

To: Regional Housing Need Allocation <rhna@bayareametro.gov>

**\*External Email\***

To ABAG;

I note that the comment period for ABAG's housing plan has opened, and it appears that requirements for additional housing assume continued growth of jobs etc. those projections result in nearly impossible numbers of new housing and if not planned for, the consequence of that failure will be to open the floodgates to uncontrolled new construction which will urbanize the entire region.

An alternative would be to mandate job shrinkage to fall into line with the ability to create housing to accommodate those jobs.

I don't see any evidence that there was any consideration of this alternative solution.

Unending growth is not inevitable.

With respect,  
Daniel Moos

From: Beth Strachan <[REDACTED]>  
Sent: Monday, November 2, 2020 9:07 AM  
To: Fred Castro [REDACTED]  
Subject: Proposed RHNA Methodology and Subregional Shares

**\*External Email\***

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I understand ABAG's Methodology Committee adopted a formula to determine allocation of units per municipality per the RHNA. I also understand that methodology, as it stands, would result in an allocation of 4,900 units for the City of Alameda. That is untenable -- it would require a huge increase in units with no infrastructure to support it. (You might know that ingress/egress for the city is limited and already problematic.) Please consider a different methodology that takes into account the physical reality of places.

Thank you!  
Beth Strachan  
[REDACTED]

## New housing

Antonia Halliwell <[REDACTED]>

Tue 10/27/2020 3:54 PM

To: Regional Housing Need Allocation <rhna@bayareametro.gov>

**\*External Email\***

Hello,

Building 1000's more homes in the Bay Area, such as in Palo Alto and Mountain View is absurd. Traffic is already horrendous, resources such as water will be scarce, and air pollution will be even worse. Please stop destroying what used to be nice areas for families to live such as Palo Alto, Los Altos, and Mountain View.

Now that more and more employees will be working from home, they can move out of the area, pay less in rent or home ownership costs, and escape the ridiculously high taxes in California. Many wise residents are fleeing California already.

Good day,

Toni Halliwell

## Proposed RHNA Methodology and Subregional Shares

marty cerles <m[REDACTED]>

Tue 10/27/2020 4:48 PM

To: Regional Housing Need Allocation <rhna@bayareametro.gov>

**\*External Email\***

Hello,

I believe that the number of housing units assigned to all Bay Area Counties needs to be dramatically increased, in order to make up for the severe deficit we currently face.

Thank you,

## Housing Methodology

Irv Brenner <[REDACTED]>

Tue 10/27/2020 9:34 PM

To: Regional Housing Need Allocation <rhna@bayareametro.gov>

**\*External Email\***

We live in a semi-arid climate wherein water conservation should be mandatory even during wet years. Yet your housing figures don't appear to have factored in the prospect of ever increasing droughts. The extreme effects we endured during previous dry spells will be overshadowed by even longer and more severe ones as predicted by climatologists. Our very survival is linked to water and yet you continue to encourage more population density. Why?

Irv Brenner

[REDACTED]  
[REDACTED]



This email has been checked for viruses by Avast antivirus software.  
[www.avast.com](http://www.avast.com)

## Roll back Palo Alto's ABSURDLY High Housing targets

Jo Ann Mandinach <[REDACTED]>

Thu 10/29/2020 12:14 PM

To: Regional Housing Need Allocation <rhna@bayareametro.gov>

**\*External Email\***

Roll back the absurdly high housing targets until you can see the effects of the pandemic. People are leaving the Bay Area in droves. San Francisco rents are down more than 30% and people leaving can't even find movers!

Palo Alto has 3 or 4 times as many commuters as residents. We've had our parked car run into by these ditzes three times, totalling our car once. YOUR agenda is costing me a fortune in money for car repairs and time wasted trying to back out of my driveway due to the congestion. UTTER IDIOCY.

Between the fires, the water shortages, the rolling blackouts, the gridlock etc. the area can't support more people or more jobs.

STOP the office developers from adding 4 times as many jobs as housing because this will only go on for all eternity.

Institute rent control so we don't create more homeless.

ENOUGH! Why live here if we can't go anywhere to hear a concert, see a play, etc. because of the ridiculous gridlock and the amount of travel time it takes. Stop telling me to take public transit when you're putting more housing on the public transit parking lots!

Most sincerely,

Jo Ann Mandinach  
[REDACTED]

# Proposed RHNA Methodology and Subregional Shares

Alfred Twu [REDACTED] >

Sun 11/1/2020 1:54 PM

To: Regional Housing Need Allocation <rhna@bayareametro.gov>

**\*External Email\***

Looks great! Appreciate the work and let's get this approved!

Alfred Twu

[REDACTED]

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November 9th, 2020

Re: Agenda item #13 Palo Alto Forward Supports the RHNA Criteria and Allocation

To: Mayor Adrian Fine, City Council Members, CC Planning and Transportation Commission, CC Working Group

Dear Mayor Fine and Council members,

Palo Alto Forward is a non-profit organization focused on innovating and expanding housing choices and transportation mobility for a vibrant, welcoming, and sustainable Palo Alto. We are a broad coalition with a multi-generational membership, including new and longtime residents.

We have followed the Bay Area RHNA development process closely, including ABAG's methodology committee discussions. As you know, the Executive Board adopted their methodology on October 15th, confirming that Palo Alto's regional housing goal will include 10,058 new homes. As Palo Alto's [staff memo on notes](#) on 8/10/2020, roughly half of the regional allocation is not related to growth but to statutory state requirements focused on helping existing residents, some of which are new to this cycle. The new factors include reducing the number of overcrowded and cost-burdened households (30% or more of income spent on housing), moving toward a more "normal" vacancy rate, and replacing demolished units as a means to not create a further deficit of housing units.

More notable however, is the allocation methodology. Palo Alto Forward supports the criteria outlined, prioritizing housing in communities that are high opportunity areas and in communities with good public transit and car commuting access to large job centers. While the allocation appears daunting, increasing housing in resource rich cities like ours is a pragmatic and equitable way to allocate new homes. If we do not do our fair share these homes will be allocated to neighborhoods like East Palo Alto, Belle Haven, and North Fair Oaks, further exasperating inequity and the jobs-housing imbalance.

Achieving these goals will be hard for all communities but the Housing Element requirement is to identify feasible sites, zoning and policies to meet the requirements. Because Palo Alto didn't make appropriate modifications to zoning and policies during our current cycle, we met just [28% of our RHNA allocation](#). To that end Palo Alto Forward encourages the council and staff to seriously plan for the Housing Element update and the North Ventura Coordinated Area Plan (NVCAP), both of which will require thoughtful and innovative elements no matter what Palo Alto's allocation. NVCAP is uniquely positioned as a great site for new housing and our

decisions there will demonstrate how seriously we're working to meet our local and regional housing goals. We can meet these goals, but only if we plan for it.

Sincerely,  
Palo Alto Forward Board

## Moratorium on the RHNA Numbers

Roberta Phillips <[REDACTED]>

Sun 11/8/2020 11:06 AM

To: Regional Housing Need Allocation <rhna@bayareametro.gov>

**\*External Email\***

Dear Sir

I am a resident of Los Altos California for the past 30 years.

The RHNA numbers given to Los Altos are impossible to meet. The City has approved projects, but because of the Covid-19 pandemic, many are not being built. Developers are running onto financial trouble .

As a regular citizen, you may not listen to me, but I hope you will. The threats from your agency is not helping, but only adding stress to oor lives.

I strongly recommend a moratorium on all RHNA requirements until the Covid -19 pandemic is over.

Sincerely

Roberta Phillips

[REDACTED]

## RHNA units in Palo Alto

steve rutledge <[REDACTED]>

Sun 11/8/2020 6:10 PM

To: Regional Housing Need Allocation <rhna@bayareametro.gov>

**\*External Email\***

Hello, and thank you for this comment period. I have lived in Palo Alto since 1980. In that time period, a once sleepy middle class town has morphed into an expensive urban environment with bad traffic problems. Like about half of people who live in Palo Alto, I can't afford a house in the Bay Area and am a long-term renter. There is no way that Palo Alto can fit 10,000 additional housing units without turning the city into a crowded urban jungle. This is totally unacceptable. If I had wanted to live in San Francisco or New York City, I would have moved there. I love that our neighborhood is quiet and safe, not overdeveloped. Just because previous Palo Alto City Council members voted to allow big office developments for techies does not give these people the right to live here. If I get a job in Malibu or Woodside, do those towns also have an obligation to build a housing unit for me? That's absurd. Since we do not vote for members of ABAG, I don't believe you have the right to destroy the character of our city. Thank you.

Julie Beer  
[REDACTED]

## questions for Saratoga City housing allocation in RHNA

Tsing Bardin <[REDACTED]>

Tue 11/10/2020 5:31 PM

To: Regional Housing Need Allocation <rhna@bayareametro.gov>

Cc: [REDACTED]

\*External Email\*

To Whom It May Concern:

I am a resident of Saratoga, CA. I have several questions about housing allocation in Saratoga.

1) I am trying to understand the methodology used to allocate the 2100 total housing units for Saratoga to be provided by Spring 2021. The current RHNA for 2015-2023 allocates 439 total units. According to the RHNA for the Bay Area, the total number of new housing units needed in the Bay Area is 441,176. This compares to 187,990 for the prior planning period of 2015-2023 representing a 234% increase in future housing. Saratoga's new allocation is 2100 versus the 439 for the prior planning period, which is a 478% increase in future housing. Why is this increase so high? The Association of Bay Area Governments (ABAG) is required to follow several [objectives from the State](#) when deciding each jurisdiction's share of the total Bay Area housing needs allocation. These include:

- *Promoting the relationship between jobs and housing, including improving the balance between the number of low-wage jobs and the number of affordable housing units in each jurisdiction.*

Since Saratoga City is a semi-residential rural city with few job opportunities, why are the total allocations so high? From what basis are these total housing numbers derived? Could you please explain in layman's terms your methodology for arriving at the 2100 total housing unit number?

2) Of these 2100 units, the Above Moderate Income allocation is 882. The prior planning period allotted 93 designated Above Moderate Income units. Why is the jump from 93 AMI units to 882 (a 948% increase) so high? Again, the Association of Bay Area Governments (ABAG) objectives include:

- *Reducing the number of units needed in an income category when a jurisdiction has an already high share of households in that income category.*
- *Furthering fair housing by reducing patterns of segregation, addressing disparities in housing needs and access to opportunity, transforming racially and ethnically concentrated areas of poverty*

Saratoga is already predominantly Above Moderate Income level. By disproportionately increasing the level of AMI housing, this would increase the segregation of high and low end housing. Again, could you please explain the methodology behind these numbers? I would appreciate an explanation in simple language so a layperson could understand.

Since the public comment period on methodology is ongoing until Nov. 24, 2020, I hope that you will be able to clarify some of these questions for me.

Thank you for your attention.

Tsing Bardin

If you need to get in touch with me, here is my contact information:

[Redacted contact information]

[Redacted contact information]

## Housing units

Marcia Fariss <[REDACTED]>

Wed 11/11/2020 8:57 AM

To: Regional Housing Need Allocation <rhna@bayareametro.gov>

**\*External Email\***

You might want Saratoga to build 2100 new housing units but this town is already built out! There is no room for this amount of housing. And, we're not a transportation hub nor are we an employment center.

The number of units you are wanting us to build is unrealistic for a community of our size. We have a minimal services government, insufficient infrastructure to support 2100 housing units, no commercial areas, no room in the schools and certainly no room to build!

You need to be realistic for our community and others like us; there is simply no way to provide that amount of housing. And, please keep in mind that COVID 19 has reminded us all that high density, (and mass transit) are prime breeding grounds for contagious diseases.

Thank you for reconsidering your unrealistic housing demands for this city.

Marcia Fariss  
Saratoga, CA

## More Homes??

Bill-Jo Taylor <[REDACTED]@[REDACTED].com>

Wed 11/11/2020 1:11 PM

To: Regional Housing Need Allocation <rhna@bayareametro.gov>

**\*External Email\***

I vote NO on more homes. We do not have enough space here in Palo Alto to be able to afford another massive buildup of homes. The quality of life is already diminished by way of the overcrowding and lack of open space. Please, do not continue to overcrowd what little space we have left.

Bill Taylor  
650-494-0921 [REDACTED]

Bay Area Association of Governments  
Bay Area Metro Center  
375 Beale Street, Suite 800  
San Francisco, CA 94105

***RE: Proposed RHNA Methodology and Subregional Shares***

I am writing to you today as a resident of the City of Monte Sereno to express my opposition to the proposed RHNA methodology and subregional shares for my city. Monte Sereno does not fit the proposed Bay Area allocation for several reasons:

- 1) Monte Sereno has no jobs base. In other words, Monte Sereno is ***all*** residential and provides a housing surplus to surrounding area employment centers. Monte Sereno is effectively already a huge housing supplier and this point is not being recognized in the allocation numbers.
- 2) Monte Sereno has no bus stops or rail stops. Adding housing to Monte Sereno actually ***increases vehicle miles traveled*** (VMT), which increases greenhouse gasses. This is diametrically opposed to the goal of trying to provide housing closer to transit routes to reduce GHG's.
- 3) Monte Sereno has no commercial districts. Until recently, Monte Sereno had only one opportunity to add multifamily housing at Montalvo Oaks. This opportunity was used up during the last RHNA cycle. There are no affordable, practical, or conceivable options at this time, other than continued support of ADU's.
- 4) Up to 30%-40% of Monte Sereno is located in a Wildfire Urban Interface area. Roads are narrow and hilly and encouraging development in such areas would be detrimental to the health and safety to residents in the event of a wildfire like Chico or Oakland Hills. WUI and other severe fire zones should be excluded from consideration of housing allocation numbers.
- 5) Monte Sereno's population has actually decreased 4.1% since the last U.S. Census. It's hard to argue demand for housing is actually increasing in Monte Sereno based on demographic trends.

While I support efforts to increase much needed housing in the Bay Area, it is important to understand that Monte Sereno just doesn't have the physical resources to add housing nor does it have the financial resources to pay the hefty fines that will undoubtedly occur when we are unable to achieve the proposed housing goals. For Monte Sereno to participate in meeting the goals of the next RHNA cycle, there must be alternative allocation solutions or exemptions provided to help this small hillside community play a meaningful part.

Respectfully,

Liz Lawler  
Resident, [REDACTED]



## Saratoga number of housing units allocation

Yi Yahoo Mail <[REDACTED]>

Wed 11/11/2020 7:33 PM

To: Regional Housing Need Allocation <rhna@bayareametro.gov>

**\*External Email\***

It appears the plan will add over 2100 housing units in Saratoga in coming years. This is a over 20% increase in the housing units (Saratoga has now about 10000).

Saratoga doesn't have many offices, not much of public transportation And road capabilities as well. With the new housing units, it will make the already congested traffic even worse.

The number doesn't make any sense, it should be assigned a much lower number of housing units.

Yi

## public comment on the RHNA allocation equation

Andrey Tovchigrechko [REDACTED] >

Thu 11/12/2020 1:53 AM

To: Regional Housing Need Allocation <rhna@bayareametro.gov>

**\*External Email\***

Dear RHNA committee,

I want to comment on the methodology. Please add my comment to the records.

I think you are missing the most important factor. To build so much housing realistically, you first need a place to build it on. Cities differ greatly in the amount of available land. Some can grow freely. Others are limited by their geography, and they cannot build much new housing. You can, of course, pretend that this is not so. But then the numbers that you are planning will not be achieved. Isn't it better to do a calculation right away so that it can really be achievable, at least theoretically?

I live in Saratoga. It is almost completely built up. There are several plots, on each of which one can build several dozen housing units. But this is the limit.

Perhaps I shouldn't worry about the SB35. Because we simply do not have a place for construction, developers will not come to us. But I still want to get involved in planning for BayArea 2050, and I love seeing a quality job.

I think you should add the parameter of free land available for construction or the possibility of city expansion as one of the factors in your equation. Because this is an absolutely fundamental factor. And then your plans will become more attainable.

Thank you.

Best regards,  
Andrey Tovchigarechko

[REDACTED]

## Comments from Livable Mountain View on Plan Bay Area RHNA numbers

Cox, Robert <[REDACTED]>

Thu 11/12/2020 10:04 AM

To: Regional Housing Need Allocation <rhna@bayareametro.gov>

Cc: louise katz [REDACTED]

**\*External Email\***

Members of the Regional Planning Committee of the Association of Bay Area Governments,

Thank you for the opportunity to comment on the setting of the RHNA numbers for Bay Area next RHNA cycle.

It has come to our attention that due to the recent pre-COVID-19 housing affordability crisis, ABAG has deemed it appropriate to greatly increase the RHNA allocations for cities in this area to multiples of the numbers that were required in the previous eight year cycle. While we acknowledge that this may have been worthy of serious consideration before the COVID-19 crisis, we believe that the changes in the way that technology companies are doing business merits reconsideration of this push to greatly up-zone our Bay area communities. In particular:

1. The COVID-19 crisis has taught our technology companies that remote work is not only possible but productive. Technology leaders like Google are now seriously considering that a hybrid work from home and remote work environment for their employees will be the best way to move forward after the COVID-19 crisis is completed. (Reference 1) Facebook CEO Mark Zuckerberg has predicted that as many as half of his company's employees could shift to remote work in the next 5-10 years. (Reference 2) The Bay Area now leads the USA as the area with the largest excess of sub-leasable office space. (Reference 3)
2. Meanwhile, as tech workers exit the Bay Area, the demand for apartments has plummeted. In Mountain View, for example, rents for single bedroom apartments have fallen 38% since last year, while rents for two-bedroom apartments have fallen 32%. (Reference 4). All of this is happening while new apartment complexes, the construction of which began before COVID-19, comprising thousands of new units are being built. This will further depress rents once these new units come online in 1-2 years. (Reference 5)

When and how to up-zone of our communities is one that should be undertaken with careful consideration of current and potential future market conditions. Once a city up-zones an area, it could be subject to lawsuits from landowners who perceive a subsequent downzoning as a "taking" of property rights. We therefore recommend that ABAG Regional Planning Committee proceed cautiously and delay the implementation of its proposed RHNA increases until the aftereffects of the COVID-19 crisis can be evaluated effectively.

Finally, we find no addendum in the attachments which documents the cost and weighs the ability of Mountain View to provide needed infrastructure to support such a massive up-zoning. This includes additional school facilities, the capacity and delivery of water, sewers, and increased police and fire protection. Mountain View is a city of only 13 square miles and is being asked to re-zone to grow 50% in the next 8 years. All this at a time when its population is substantially decreasing.

Thank you for your consideration in this important matter.

Robert Cox and Louise Katz

For the Steering Committee of Livable Mountain View

<https://www.livablemv.org/>

Disclaimers:

Livable Mountain View is an independent Mountain View organization not directly affiliated with Livable California.

Robert Cox is the Chair of Mountain View's Environmental Planning Commission and is a co-author of this letter as a member of Livable Mountain View Steering Committee. He is not speaking officially on behalf of the

Commission in this letter.

References:

1. <https://www.forbes.com/sites/jackkelly/2020/09/28/google-ceo-sundar-pichai-calls-for-a-hybrid-work-from-home-model/?sh=594b84d4e9cf>
2. <https://www.vox.com/recode/2020/5/21/21266570/facebook-remote-work-from-home-mark-zuckerberg-twitter-covid-19-coronavirus>
3. <https://www.timesheraldonline.com/2020/10/05/real-estate-bay-area-office-sublease-space-soars-tech-coronavirus/>
4. <https://www.zumper.com/rent-research/mountain-view-ca>
5. <https://www.mountainview.gov/depts/comdev/planning/activeprojects/list.asp>

## Re - RHNA allocation. Alameda is at emergency traffic levels and cannot sustain more population

Margie Siegal [REDACTED] >

Thu 11/12/2020 12:43 PM

To: Regional Housing Need Allocation <rhna@bayareametro.gov>

**\*External Email\***

I am a resident of Alameda. I am very concerned by the continued push to enforce unneeded and unnecessary construction

- (1) Population of California is at a standstill. People are moving out of the Bay Area.
- (2) New construction in the Bay Area is extremely expensive and there is no money for public housing
- (3) There are only FOUR ways in and out of Alameda. During rush hour, all four entrances/exits are at max capacity. In the event of a major fire, earthquake or tsunami, we will not be able to evacuate. People will die.
- (4) I have seen maps showing that in thirty years, significant areas of Alameda will be under water

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Margie Siegal

## 2023 housing numbers

Evert Wolsheimer <[REDACTED]>

Fri 11/13/2020 7:02 PM

To: Regional Housing Need Allocation <rhna@bavareametro.gov>

Cc: Evert Wolsheimer [REDACTED]

**\*External Email\***

Dear ABAG,

We just read the new requirements for the 2023-2033 period.

I would like to invite you to come out from behind your desk and stop working on those spreadsheets for a day and visit Monte Sereno.

I have lived here for 18 years, been on the planning commission and on the City Council, so I'm fairly familiar with the City.

There are NO open lots in Monte Sereno. There are no strip malls to tear down and replace with housing. The City is 100% built out. Completely full. So when you tell us we have to build 192 units, we would appreciate your help in finding space to build them.

Please advise us what to do. I'm pulling out what's left of my hair when I see your requirements.

Respectfully,

Evert Wolsheimer

[REDACTED]

## Proposed RHNA Methodology

Hinderberger Phil [REDACTED] >

Sat 11/14/2020 10:19 PM

To: Regional Housing Need Allocation <rhna@bayareametro.gov>

**\*External Email\***

RHNA Methodology assigns the number of Affordable Housing units needed by City and County. Please advise

Is the territory of a city for purposes of assigning Affordable Housing unit allocation its designated legal boundaries, LAFCO assigned zone of influence or some other definition.

Does a city that has constructed Affordable Housing units outside its jurisdictional territory still get credit against its Affordable Housing unit requirements?

Thank you.

Philip R. Hinderberger

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

# Proposed RHNA Methodology and Subregional Shares

Cathy Benediktsson [REDACTED] >

Mon 11/16/2020 7:37 AM

To: Regional Housing Need Allocation <rhna@bayareametro.gov>

**\*External Email\***

You are not elected by the cities.  
Just STOP interfering in local jurisdictions.

I object and reject to the methods and shares completely.

Chris

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## Proposed RHNA Methodology and Subregional Shares

Drew Dara-Abrams <[REDACTED]>

Mon 11/16/2020 9:25 AM

To: Regional Housing Need Allocation <rhna@bayareametro.gov>

**\*External Email\***

Dear members of the ABAG Regional Planning Committee,

I'm writing in to support the proposed RHNA methodology and subregional shares plan that promotes equity.

While I do not understand all of the specific factors that ABAG leaders, staff, and consultants have been weighing as part of this process, I appreciate that it is a complicated process that needs to take into account many different factors. I am pleased to see that the proposed plan emphasizes equity concerns and focuses development on the inner Bay Area and cities that will benefit most from in-fill (while still asking all counties and cities throughout the Bay Area to add more housing).

My family and I live in Alameda, where we appreciate its walkable neighborhoods and business districts and its centrality to job opportunities throughout the inner Bay Area. More households should have the opportunity to live as we do. It will be good for overall carbon emissions, it will be good for our communities, it will be good for the residents and workers who are most impacted by high housing costs, and it will not degrade or take away from what we like about Alameda.

Despite some vocal opponents in smaller newspapers and on mailing lists who appear to be playing a mean "zero sum" game to argue their RHNA allocation onto other jurisdictions, I think there are actually a lot of folks and a lot of elected leaders who understand the need to fairly build more housing throughout the Bay Area, with all jurisdictions taking on the responsibility—and the opportunity—for more housing. Thank you for managing this process and please take this as a public comment in support of the proposed methodology and subregional shares.

Sincerely,  
Drew Dara-Abrams  
Alameda, CA

**From:** slevy@ccsce.com <[REDACTED]>  
**Sent:** Tuesday, November 17, 2020 12:49 PM

**To:** Ursula Vogler [REDACTED]; Dave Vautin [REDACTED]  
**Subject:** Re: Plan Bay Area 2050 Implementation Plan: Housing and Economy

**\*External Email\***

H

I could not make the mural work so here are my thoughts

While PBA has robust housing goals, this process was completed before the RHNA and methodology committee allocation recommendations.

As you know there is local resistance.

Major zoning changes at the local level or by state legislation are required to implement the housing production strategies with respect to total units, use of public lands, repurposing malls and siting and making feasible units for low income residents.

I can see MTC in partnership with HCD playing a couple of helpful roles with regard to building public understanding and, perhaps hopefully acceptance of the RHNA/PBA housing goals.

These include

--HCD explaining existing enforcement tools and their intent to enforce

--MTC supporting additional enforcement tools in the 2021 session and beyond

--MTC and HCD holding widespread public forums and going to select city councils to explain the new housing element requirements including non reuse of sites from old HEs and non feasible sites.

--MTC convening best practice webinars regarding zoning changes to implement use of public lands and repurposing of malls, etc.

--MTC going around the region explaining the (I think great) allocation criteria.

ith regard to housing for low and moderate income residents I can see

--MTC following through with negotiating a RHA funding plan perhaps in collaboration with foundations and businesses.

--MTC supporting state bonds

--MTC supporting a state bond funded economic recovery plan that 1) funded low income housing and also funded efforts that support the transportation and climate goals of PBA.

--MTC supporting state legislation to drop the majority for local housing bonds to 50 or 55%.

--MTC convening best practice webinars with regard to the thorny challenge of middle income housing and supporting state legislation for affordable housing by design--that failed last year but seems needed to meet the PBA strategy successfully.

Although it was not "legal" in this webinar, I do think with the new RHNA that PBA does not have sufficient strategies by a very wide margin.

And though it is a selected strategy I think moving jobs to outlying areas (something companies can do now and do sometimes) is a poor idea and has no chance of success. Companies will locate here they think best for access to labor force and other criteria.

The allocation committee got it right--help low income folks live in high opportunity areas and in areas with access to existing jobs.

I come from a city that fits both criteria and may come whining to MTC to put Palo Alto's housing allocation in areas less suitable.

Steve

I couldOn 2020-11-13 17:06, Ursula Vogler wrote:

Dear Partners and Stakeholders:

Thank you all for participating in the Plan Bay Area 2050 Implementation Plan workshop for the Housing and Economy elements of the Plan. This workshop will help inform the development of tangible actions that ABAG, MTC, and you can take to advance the adopted strategies in the Plan Bay Area 2050 Final Blueprint. Please find the attached documents for review prior to the meeting next Tuesday:

1. Participant Guide
2. Final Blueprint Strategy Definitions (4-page briefing document)
3. Housing and Economy Workshop Slide Deck

Please note we will be using the Mural program during this workshop; **please review the Participant Guide in advance to ensure you're ready to engage interactively via Mural!** For best results, we recommend that you use a desktop or laptop with a mouse. If you have difficulties with the technology during the workshop, we will provide the opportunity for you to give verbal input.

Zoom link for workshop: <https://bayareametro.zoom.us/j/89468056443?pwd=Q2VVbG9wOWhsMDBLRklzbWJZNk15Zz09>

Meeting ID: 894 6805 6443

Passcode: 110079

One tap mobile: +16699006833,,89468056443# US (San Jose)

**Due to limited capacity for this workshop, if you are no longer able to attend, please let me know.**

Thank you, and we look forward to seeing you on Tuesday.

Thank you,  
Ursula for the Plan Bay Area 2050 team

**From:** [David Howard](#)  
**To:** [Fred Castro](#)  
**Subject:** Nov 12 meeting - opposition to housing allocation methodology  
**Date:** Tuesday, November 10, 2020 8:52:39 AM

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**\*External Email\***

Please include this e-mail as input to the upcoming November 12 Regional Planning Committee, item #6. (And wherever else appropriate.)

I'm sure ABAG is aware of the published criticisms of it's housing allocation methodology, specifically a recent study that came out that details how ABAG is double-counting housing needs.

"Do the Math: The state has ordered more than 350 cities to prepare the way for more than 2 million homes by 2030. But what if the math is wrong?"

I'm opposed to ABAG using its current methodology which seems to double-count.

I'm also opposed to ABAG senselessly allocating so many units to Alameda, which can practically be built ONLY in serious flood and liquefaction hazard zones. I'm opposed to ABAG's single-mindedness about housing allocation, with no consideration for how transportation infrastructure is missing or can be built to support the housing.

David Howard  


**From:**

[Fred Castro](#)

**Subject:**

Item 6a on Nov. 12, ABAG Regional Planning Committee Agenda Public Hearing on RHNA Proposed Methodology

**Date:**

Wednesday, November 11, 2020 3:39:04 PM

**\*External Email\***

Dear Regional Planning Committee Chairperson Mitchoff and Committee Members:

The purpose of this letter is to express my concern with the ABAG Executive Board's tentative adoption of a methodology that does not include natural hazards in the allocation formula. On page 5 of the Oct. 15 report of the Executive Director he comments on the decision to omit this factor from the methodology with the parting sentence, "Local governments will have the opportunity to consider the most appropriate places for planning for housing in lower-risk areas when they update the Housing Elements of their General Plans." That may be true of most cities in the Bay area, but it is certainly not true of my City, Alameda.

The ABAG Natural Hazard map at

[https://abag.ca.gov/sites/default/files/factor\\_o1\\_natural\\_hazards\\_v2.pdf](https://abag.ca.gov/sites/default/files/factor_o1_natural_hazards_v2.pdf) indicates that Alameda is among those cities with the lowest percentage of urbanized area outside of a hazard zone (less than 50%). It is obvious that the primary hazard that causes this is sea level rise. See

<https://www.nbcbayarea.com/investigations/unlike-any-disaster-we-have-ever-seen-says-state-agency-about-rising-seas-in-bay-area/2236314/> which indicates the current projections for year 2100 are 66 inches with a storm surge level of 84 inches. A review of flood visualization maps shows that the portion of Alameda that is outside of a hazard zone is the center of the island which is already a very densely built up area. Therefore Alameda has ***no choice*** but to build new housing directly in the flood hazard zone. In fact, the 4000 plus new units that have been approved in the present cycle are primarily in the flood hazard zone.

Add to all of the above the fact that Alameda is an island with very limited ingress /egress over antiquated tubes and bridges and the fact that most of our police and fire first responders live off the island.

None of the above is intended to argue that Alameda should not have a significant RHNA. We are a high resource City that fits very well into the equity factor. However, a fair allocation demands that our negative natural hazards factor should be an element of the final allocation.

To fail to do so endangers not only present residents but also those who will be occupying the new housing.

Sincerely,

Paul S Foreman

**From:** [REDACTED]  
**To:** [Fred Castro](#)  
**Subject:** comments re the City of Alameda RHNA  
**Date:** Sunday, November 8, 2020 10:17:42 PM

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**\*External Email\***

Hi, Our local Alameda newspaper provided this email for sending comments about ABAG/RHNA numbers. I am writing out of concern regarding the current allocation formula and the untenable number of housing units it would require to reach the affordable housing goals. I am sure you have heard this concern from many others and specifically concerns due to rising water levels, liquefaction, traffic, lack of infrastructure to support what would seem to be a 42% increase in units over current units/units in construction/planned already. Sadly our city council appears uninterested in applying for a variance from the current formula to the alternative proposed by Contra Costa County cities. I am requesting that you give serious consideration to citizen concern in your Methodology Committee and Executive Board meetings and decision-making process. While I understand that housing is lagging behind need, I think it is past time to shift the entire paradigm. I think, given the advent of remote working, and the huge income inequality between the bay area/south coast and the rest of the state, that regional job and housing hubs should be planned and developed throughout these low income areas. This would take pressure off of already over built urbanized areas that lack supportive infrastructure and can hardly imagine how to pay for said infrastructure. It will be much less costly to develop in other areas.

Thank you,  
Vali Ebert

**From:** [Edward Sing](#)  
**To:** [Fred Castro](#)  
**Cc:** [REDACTED]  
**Subject:** Item 6a on Nov. 12, ABAG Regional Planning Committee Agenda Public Hearing on RHNA Proposed Methodology  
**Date:** Wednesday, November 11, 2020 8:39:42 PM

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**\*External Email\***

It would be greatly appreciated if you can pass this email on to the Regional Planning Chairman and Committee Members.

**Dear Regional Planning Committee Chairperson Mitchoff and Committee Members:**

I would like to add my support to Paul Foreman's comments to you, below regarding Item 6A of your November 12th Planning Committee meeting - in addition to the following:

One concern that arose during discussions of the recently defeated Measure Z in Alameda (which would have removed voter approved development restrictions in Alameda) is the susceptibility of Alameda to multiple natural hazards (earthquakes, liquefaction, sea level rise, tsunami surges). Although these hazards exist for many cities adjacent to San Francisco Bay, Alameda is unique in that egress from Alameda should such natural hazards occur and emergency response access to the island is limited to aging bridges and tunnels which are already overwhelmed during normal rush hour conditions. Adding RHNA 3900 housing units in the period from 2023 to 2030 would require building another 12000 (approximate) market rate units in order to achieve the RHNA target. This would increase the total number of housing units in Alameda by over 30% (approximate), burdening an already stressed infrastructure as well as exacerbating ingress onto and egress off of the island during emergency conditions. Such concerns should be reflected in the process of determining RHNA requirements for Alameda.

The RHNA requirements stress proximity to major city centers. This might have been a valid factor pre-Covid but now, it has been demonstrated that teleworking has greatly decreased the need for proximity to the major city centers and will inevitably create a need for more jobs in professional as well as service industries in more outlying cities. Such changing employment and housing needed characteristics should be reflected in the process of determining RHNA requirements for Bay Area cities. Even discounting potential changes in employment centers due to Covid, giving more weight to proximity to major business centers is somewhat tenuous, as pre-Covid, over 400,000 commuters used mass transit to commute from outlying cities into the major business centers.

I fully support the concept of social equity. However, I ask that you consider Paul Forman's and my concerns and viewpoints regarding the proposed RHNA requirements for the City of Alameda.

Thank you,

Edward Sing  
Alameda Resident

[REDACTED]

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**From:** Kevin Ma [REDACTED]  
**Sent:** Tuesday, November 17, 2020 11:03 PM  
**To:** Regional Housing Need Allocation  
**Subject:** Proposed RHNA Methodology and Subregional Shares

**\*External Email\***

Dear ABAG Board and Staff,

As a resident of the Bay Area, I support the plan brought forward by the Housing Methodology Committee, as it has taken the input of a diverse set of opinions and backgrounds.

I have heard some discussion on whether the higher numbers for unincorporated areas would conflict with anti-sprawl measures. I believe that ABAG should instead better divide unincorporated areas into smaller chunks, perhaps by Census-Designated places. For example, in Santa Clara County, we would be better separating it to Stanford, Alum Rock, San Martin, and other segments so as not push development into areas like Coyote Valley. This also alleviates inter-city fights over who'd get the additional numbers to make up for unincorporated reductions.

What I do not wish to see are major reductions in resource-rich areas. The proposed RHNA numbers are higher than previous cycles because they recognize the housing crisis we find ourselves in; Plan Bay Area 2050 was initially going to provide an even higher RHND after all. Previous planning failures do not justify shirking our responsibilities to current and future generations to provide an affordable, equitable, sustainable place to live. And we must be affirmatively furthering such actions.

Sincerely,  
Kevin Ma

[REDACTED]

# SUSTAINABLE TAMALMONTE

215 Julia Ave  
Mill Valley, CA 94941

November 18, 2020

Mayor Jesse Arreguin, President  
Association of Bay Area Governments (ABAG) Executive Board  
c/o ABAG & MTC Public Information Office  
375 Beale Street, Suite 800  
San Francisco, CA 94105  
RHNA@bayareametro.gov

Re: Proposed RHNA Methodology

Dear President Arreguin and ABAG Executive Board Members,

Sustainable TamAlmonte submits the following comments on the proposed Regional Housing Need Allocation (RHNA) methodology, **Option 8A**, recommended by the ABAG Housing Methodology Committee. We respectfully request that you reject **Option 8A** and instead approve an Alternative RHNA Allocation Methodology Option. A revision to the allocation methodology is necessary to meet RHNA statutory objectives and for the Regional Housing Need Allocations to be consistent with the Plan Bay Area 2050 Blueprint.

## I. PROBLEMS WITH THE OPTION 8A RHNA ALLOCATION METHODOLOGY

The **Option 8A** RHNA Allocation Methodology fails to fulfill the following RHNA statutory objectives and Plan Bay Area 2050 Draft Blueprint purpose, guiding principle, objectives, strategies, and policy:

- The Second Statutory Objective for RHNA is; “Promoting infill development and socioeconomic equity, **the protection of environmental and agricultural resources**, the encouragement of efficient development patterns, and **the achievement of the region’s greenhouse gas reductions targets provided by the State Air Resources Board** pursuant to Section 65080.”<sup>1</sup>
- The Sixth Statutory Objective for RHNA, pending state legislation, is; “**Reducing development pressure within very high fire risk areas.**”<sup>2</sup>

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<sup>1</sup> [https://rhna-factors.mtcanalytics.org/data/RHNA\\_Statutory\\_Objectives.pdf](https://rhna-factors.mtcanalytics.org/data/RHNA_Statutory_Objectives.pdf)

<sup>2</sup> [https://rhna-factors.mtcanalytics.org/data/RHNA\\_Statutory\\_Objectives.pdf](https://rhna-factors.mtcanalytics.org/data/RHNA_Statutory_Objectives.pdf)

- As mandated by Senate Bill 375, the main purpose of the Plan Bay Area 2050 Draft Blueprint, the Bay Area’s Sustainable Communities Strategy, is to **lower Green House Gas (GHG) emissions from cars and light trucks** while accommodating all needed housing growth within the region.
- Plan Bay Area 2050 Draft Blueprint’s Guiding Principle entitled “Healthy” states; **“The region’s natural resources, open space, clean water, and clean air are conserved – the region actively reduces its environmental footprint and protects residents from environmental impacts.”**<sup>3</sup>
- Plan Bay Area 2050 Draft Blueprint’s Strategy #8 states; **“Reduce Risks from Hazards.** Adapt the vast majority of the Bay Area’s shoreline to sea level to protect existing communities and infrastructure, while providing means-based financial support to retrofit aging homes.”<sup>4</sup> Until communities and infrastructure are actually protected from sea level rise, areas subject to sea level rise should not be further developed.
- Plan Bay Area 2050 Draft Blueprint’s Strategy #9 states; **“Reduce Environmental Impacts.** Maintain the region’s existing urban growth boundaries through 2050, while simultaneously partnering with public and non-profit entities to protect high-value conservation lands. **Further expand the Climate Initiatives Program to drive down greenhouse gas emissions.”**<sup>5</sup>
- The Plan Bay Area 2050 Draft Blueprint states that **Areas Outside Urban Growth Boundaries (including Priority Conservation Areas – PCAs) and Unmitigated High Hazard Areas should be protected.**<sup>6</sup> As such, growth should not be targeted in such areas.
- In addition, the Housing Opportunity Areas are supposed to be areas with high quality public schools, proximity to well-paying jobs, a high-income population, and a **clean and safe environment.** <sup>7</sup>

Contrary to the above RHNA and Plan Bay Area 2050 objectives, the Option 8A RHNA Allocation Methodology will not further Green House Gas reduction goals or protect residents from hazardous environmental impacts. Option 8A allocates too many housing units to suburban areas that are far from job centers, lack adequate public transit, and are subject to perilous hazards. Especially worrisome is the fact that the methodology increases development in high fire hazard zones with unsafe evacuation routes, and in areas subject to lack of water supply, sea level rise, and flooding.

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<sup>3</sup> [https://www.planbayarea.org/sites/default/files/PBA2050\\_GP\\_Res.4393\\_Table.pdf](https://www.planbayarea.org/sites/default/files/PBA2050_GP_Res.4393_Table.pdf)

<sup>4</sup> [https://www.planbayarea.org/sites/default/files/5b\\_PBA50\\_DraftBlueprint\\_StrategiesAction.pdf](https://www.planbayarea.org/sites/default/files/5b_PBA50_DraftBlueprint_StrategiesAction.pdf)

<sup>5</sup> [https://www.planbayarea.org/sites/default/files/5b\\_PBA50\\_DraftBlueprint\\_StrategiesAction.pdf](https://www.planbayarea.org/sites/default/files/5b_PBA50_DraftBlueprint_StrategiesAction.pdf)

<sup>6</sup> Mayor Pro Tem Pat Eklund. “Report on ABAG to MCCMC”. September, 2020

<sup>7</sup> <https://www.treasurer.ca.gov/ctcac/opportunity/2020-tcac-hcd-methodology.pdf>

## II. RECOMMENDED ALTERNATIVE RHNA ALLOCATION METHODOLOGY OPTION

In order for the Regional Housing Need Allocations to meet RHNA Statutory Objectives and be consistent with Plan Bay Area, we recommend you approve an Alternative RHNA Allocation Methodology Option with the following features:

### 1. Use the baseline allocation recommended by the Contra Costa County Mayors Conference entitled; “Future Housing Growth 2015-2050 (Draft Blueprint)” AKA “Housing Growth (Blueprint)”:

The new Alternative RHNA Allocation Methodology Option should use the baseline allocation recommended by the Contra Costa County Mayors Conference entitled; “Future Housing Growth 2015-2050 (Draft Blueprint)” AKA “Housing Growth (Blueprint)” in **Figure 1** (below). This alternative baseline allocation is based on each jurisdiction’s share of Bay Area household future growth through 2050 and is better aligned with the growth pattern in the Plan Bay Area 2050 Draft Blueprint. Emphasis on future employment development patterns leads to RHNA allocations being more focused in Silicon Valley, the region’s largest job center. Moreover, this approach was suggested by ABAG Staff in July 2020 and is consistent with how long-range forecasts have been used in ABAG’s methodologies for previous RHNA cycles.

*Figure 1: Jurisdiction Share of Regional Total for Baseline Allocation Options*



### 2. The new RHNA Allocation Methodology Option should target growth near employment and high-quality public transit:

Option 8A targets growth in areas far from employment and/or areas with non-existent or poor-quality public transit, in which bus routes have average service intervals during peak traffic hours that are as long as 30 minutes. Few, if any, residents would use public transit that is so inconvenient. Instead, include a metric in the RHNA Allocation Methodology that targets growth near employment centers and in “Transit Rich Areas”. Transit Rich Areas should be areas near a “major transit stop”, such as a rail transit station or ferry terminal, or a “high-quality bus

corridor”, which is a fixed bus route service with average service intervals of 15 minutes or else 10 minutes or less during peak traffic hours.

**3. The new RHNA Allocation Methodology Option should preclude development in areas subject to hazards, particularly areas subject to lack of water supplies, sea level rise & flooding, and high fire risk:**

Only Option 8A’s baseline allocation, which is consistent with the Plan Bay Area 2050 Draft Blueprint, protects households from hazards. Many of Option 8A’s other metrics, including the “High Opportunity Areas Map”, target household growth in hazardous areas, which would greatly endanger residents. This should be rectified.

When trying to improve housing equity and further fair housing, it is unconscionable to expose vulnerable senior and lower income households to high hazard risks, when they have the least resources available to cope with the adversity caused by such hazards.

A new alternative RHNA Allocation Methodology Option should preclude development in areas subject to hazards, particularly areas subject to lack of water supplies, sea level rise & flooding, and areas within the Wildlands Urban Interface with unsafe evacuation routes. This includes Very High Fire Hazard Zones and High Fire Hazard Zones. Evacuation routes in “High Fire Hazard Zones” are typically just as perilous as “Very High Hazard Zones”.

In addition, please ensure that the RHNA allocation methodology and Plan Bay Area 2050 Draft Blueprint use Wildland Urban Interface (WUI) maps to identify high fire risk areas. These maps are available at local Fire Districts and in the Metropolitan Transportation Commission Map Gallery.

We understand that, currently, only CAL FIRE High Fire Hazard Severity Zones are factored into the RHNA methodology and Plan Bay Area. Many high fire risk areas, which are in Local Responsibility Areas and not State Responsibility Areas, have not been evaluated by CAL FIRE, and therefore have not been given a “Severity” designation (a term only used by CAL FIRE) and are not identified on CAL FIRE maps.

Below is a link to the CAL FIRE map entitled: "DRAFT Fire Hazard Severity Zones in Local Responsibility Areas". You will see that in the Local Responsibility map there are gray areas entitled; “Local Responsibility Area Un-zoned – (LRA Un-zoned)” - meaning CalFire has not yet evaluated these areas.

Link to “DRAFT Fire Hazard Severity Zones in Local Responsibility Areas” Map:  
[https://osfm.fire.ca.gov/media/6706/fhszl06\\_1\\_map21.pdf](https://osfm.fire.ca.gov/media/6706/fhszl06_1_map21.pdf)

### III. CONCLUSION

We respectfully request that you reject the **Option 8A** RHNA Allocation Methodology and instead approve an Alternative Allocation Methodology Option with the above recommended features. In doing so, you will correct the flaws of Option 8A and provide a RHNA Allocation Methodology that meets RHNA statutory objectives and is consistent with the Plan Bay Area 2050 Draft Blueprint.

Thank you in advance for your conscientious consideration.

Very truly yours,

*/s/*

Sharon Rushton, Chair  
**Sustainable TamAlmonte**

Personal Statement to ABAG re: RHNA requirements

As a concerned resident of Portola Valley I am sending you my comments re: your new RHNA requirements. I am completely in favor of your attempts to create affordable housing in our area; having lived here since 1974 I have observed the continuous decline of decent housing for our working population.

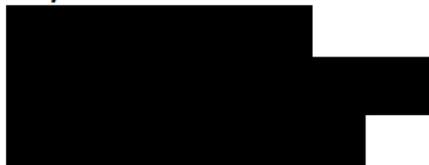
That being said; the new requirements were written in our “old” world. The pandemic has really turned everything in society upside down and we will not be able to see what the future will look like for at least a year. It seems impractical to keep enforcing such stringent rules on planning for more housing to be built when we can see dozens of large office spaces empty, retail locations becoming vacant and people moving from the Bay Area.

Also as a resident of a town with a high risk of wildfires; I would hope ABAG can push the “pause” button for six months to a year until more planning can take place.

I have always been in favor of ABAG’s approach to organizing all our counties into a somewhat unified group; not perfect but it has helped the area in many ways.

Thank you for all your hard work.

Joyce Shefren



[REDACTED]

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**From:** Al Dugan [REDACTED]  
**Sent:** Wednesday, November 18, 2020 12:18 PM  
**To:** Regional Housing Need Allocation  
**Cc:** Sharon Rushton  
**Subject:** Comment on MTC/ ABAG RHNA Projections.

**\*External Email\***

I raised this issue with ABAG in the past; there is a very big variance between ABAG/MTC population growth projections for Marin used to allocate RHNA requirements and the CA Department of Finance (DOF) population projects.

[http://www.dof.ca.gov/Forecasting/Demographics/projections/documents/P1\\_County\\_1yr.xlsx](http://www.dof.ca.gov/Forecasting/Demographics/projections/documents/P1_County_1yr.xlsx)

CA DOF projections are used by every unit of the CA government for planning, yet again is being ignored by ABAG/MTC. This illustrates a major flaw in the RHNA projections for Marin. I believe a legal challenge would be in order if the Marin RHNA is approved per the MTC/ABAG projection is approved.

Al Dugan  
[REDACTED]

[REDACTED]

## Eli Kaplan

---

**From:** Dave Vautin  
**Sent:** Thursday, November 19, 2020 2:56 PM  
**To:** Al Dugan  
**Cc:** Regional Housing Need Allocation  
**Subject:** RE: Marin RHNA

Thank you Al. The report is in draft form, so I'm sending along your suggestions to the RHNA comment box. We are taking comments through Friday 11/27.

Dave Vautin, AICP  
Assistant Director, Major Plans  
dvautin@bayareametro.gov - (415) 778-6709

BAY AREA METRO | BayAreaMetro.gov  
Metropolitan Transportation Commission  
Association of Bay Area Governments

-----Original Message-----

From: Al Dugan <aldugan2002@yahoo.com>  
Sent: Thursday, November 19, 2020 2:41 PM  
To: Dave Vautin <DVautin@bayareametro.gov>  
Subject: Marin RHNA

\*External Email\*

I have searched the report, and see no analysis of water, funding for schools, funding for police and other related services to larger volumes of housing. Can you please advise, I am working to complete my review and final submission.

This is particulate critical for Novato. The city only receives 7.5% of property tax revenue and is the poorest city for revenue per person in Marin county and is being assigned 55% of the housing.

Al Dugan  
Novato

Sent from my iPad

[REDACTED]

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**From:** Steve Levine [REDACTED]  
**Sent:** Wednesday, November 18, 2020 12:22 PM  
**To:** Regional Housing Need Allocation  
**Subject:** RHNA Proposed Methodology  
**Attachments:** Sustainable TamAlmonte letter to ABAG Executive Committee re- RHNA Allocation Methodology 11-18-20.pdf

**\*External Email\***

We strongly endorse the recommendations to you made by Sustainable TamAlmonte.  
We would appreciate your support of their valid points regarding the proposed RHNA methodology.  
Thank you,  
Steven Levine  
[REDACTED]



1275 4th Street #179  
Santa Rosa, CA 95404

(707) 900-4364  
info@generationhousing.org

November 27, 2020

Mayor Jesse Arreguín, President  
Executive Board, Association of Bay Area Governments  
375 Beale Street, Suite 700  
San Francisco, CA 94105

**RE: Proposed RHNA Methodology and Subregional Shares – Support for Option 8A & Sonoma County Unincorporated Allocation Adjustment**

Dear President Arreguín & ABAG Executive Board,

Generation Housing respectfully encourages the Association of Bay Area Governments (ABAG) to adopt the Proposed Regional Housing Needs Allocation (RHNA) Methodology and adjust the preliminary allocation for unincorporated Sonoma County.

Generation Housing is a nonprofit housing advocacy organization that works to support an increase in the supply, diversity, and affordability of housing in Sonoma County. The proposed methodology is an equitable, ambitious, and well-researched strategy to house our region that recognizes our climate crisis and a legacy of segregation on the basis of race and income in the San Francisco Bay Area.

Generation Housing embraces the overall baseline allocation for Sonoma County made in data-driven consideration of Plan Bay Area 2050. Our county is expected to build 4% of the Bay Area's housing, or just over 17,000 homes. This marks a 108% increase countywide over the 2015-2023 RHNA cycle, but is the same percentage as last cycle and proportional to our population within the San Francisco Bay Area. We are confident that Sonoma County is capable of meeting the challenge of accelerated housing production with transit-oriented infill development that lowers vehicle miles traveled (VMT).

Generation Housing urges ABAG to consider an adjustment to the housing allocation for unincorporated areas serviced by the County of Sonoma. An adjustment to the allocation should consider an intra-county shift that reallocates some of our baseline allocation into cities and towns of Sonoma County. Generation Housing echoes concerns expressed in letters submitted by Greenbelt Alliance and Jane Riley, AICP, Comprehensive Planning Manager with the County of Sonoma.

Rural, unincorporated areas of Sonoma County face substantial challenges to housing production spanning fires, floods, and decentralized infrastructure. A series of wildfires that have reshaped our region since 2017 have disproportionately devastated our communities outside of city limits. A nearly tenfold increase in the housing allocation to unincorporated Sonoma County over the last RHNA cycle heightens our concern for further loss of life and property. Moreover, urban growth boundaries and community separators mandated by voters across our county culminate in a near impossibility of over 5,000 new homes sprawling into the farms and open spaces of unincorporated Sonoma County. We accept the challenge of the higher overall housing numbers for Sonoma County, and Generation Housing is keen to help determine a better way to build 17,000 new homes countywide.

We have been impressed with the ABAG Executive Board, Housing Methodology Committee, and Staff who have faced the challenge of creating nearly half a million homes in our region with innovation and care. The preliminary allocation warrants approval, and requires continued attention.

Respectfully,

Jen Klose



Executive Director, Generation Housing

cc: ABAG Executive Board Director Jake Mackenzie, City of Rohnert Park  
ABAG Executive Board Director David Rabbitt, County of Sonoma  
Gillian Adams, Principal Planner, Regional Housing Needs Allocation



proposed RHNA methodology is no longer appropriate

Mary McFadden [REDACTED]

Fri 11/27/2020 12:09 PM

To: Regional Housing Need Allocation <rhna@bayareametro.gov>

**\*External Email\***

I urge you to reject the proposed RHNA Methodology until the accuracy of the housing numbers is confirmed, the assumptions are aligned with the reality of state (not national) trends in a post-COVID world; and the legality of the decision is determined.

M McFadden  
[REDACTED]

## Reject the proposed RHNA Methodology

Eric Schaefer [REDACTED] >

Fri 11/27/2020 11:51 AM

To: Regional Housing Need Allocation <rhna@bayareametro.gov>

**\*External Email\***

I urge you to reject the proposed RHNA Methodology until the accuracy of the housing numbers is confirmed, the assumptions are aligned with the reality of state (not national) trends in a post-COVID world; and the legality of the decision is determined.

Without an appropriate methodology, the Bay Area will continue to develop too much market rate (luxury) housing and too little affordable housing.

Thank you.

--

Eric Schaefer

“Treating different things the same can generate as much inequality as treating the same things differently.”

— Kimberlé Crenshaw

## RHNA Cycle 6 Methodology

Eric Filseth <[REDACTED]>

Fri 11/27/2020 11:57 AM

To: Regional Housing Need Allocation <rhna@bayareametro.gov>

Cc: Tom DuBois <[REDACTED]>

**\*External Email\***

Dear ABAG Executive Board,

Please take two actions relative to the proposed RHNA Methodology.

First, **please reject the proposed RHNA Methodology altogether until the accuracy of the housing numbers can be confirmed.** The accuracy of RHNA targets takes on a much greater criticality when they don't merely guide zoning plans, but where the State punishes cities if the private sector does not actually build the units. The accuracy of the regional RHNA Cycle 6 targets is especially suspect because:

- There's growing quantitative evidence that HCD's targets are overstated, and that the Bay Area's target of 441,000 units may be 25-50% too high even by HCD's own models
- Even on a qualitative basis, HCD's aggressive targets challenge credibility at a time when large numbers of people are leaving the state, it's clear that remote work will persist in a post-COVID world, and rental prices in California cities are already falling.

Second, once realistic regional numbers become available, **please adjust the RHNA methodology to include city-by-city job-growth policies into the assessment of "high opportunity" vs "low opportunity" zones.**

Under HCD's methodology, the RHND targets come roughly half from "pent up demand" calculated by attempts to estimate overcrowding; and the other half from expectations of future job and population growth. No matter what calculation is used to estimate existing "pent up demand," individual City policies don't influence their "pent up demand;" but individual City policies certainly do influence their own future job growth.

As everybody knows, the region's housing woes stem from its generation of new jobs much faster than housing. However, this can be influenced at the City-by-City level. For example, starting in 2015 Palo Alto began imposing commercial growth limits that drastically curtailed its future job growth through the year 2030 – essentially to stop the City's job growth from outstripping its ability to provide housing for those workers. So a large mixed-use project such as Greystar (<https://padailypost.com/2020/11/16/massive-five-block-office-and-apartment-project-approved/>), approved in different city last week, and which adds much more new housing demand than new supply, can't be built in Palo Alto until at least RHNA Cycle 7. This has drastically curtailed Palo Alto's jobs growth, as intended

The RHNA Cycle 6 methodology should consider such individual City actions in its determination of what constitutes "high opportunity" zones, for two reasons:

1. First, half of new housing (the "new" half, not the "pent up" half) should be more heavily directed to the cities where new jobs are likely to appear. There's no reason to put new housing for new San Jose jobs in Atherton.
2. Second, cities which want to create jobs to drive their own economic growth should certainly do so, but they should also take responsibility for the housing needed to support those jobs. If every city balanced its

job and housing growth, as a region we'd solve the problem.

ABAG should insist that HCD should do its calculation of statewide targets in a way that is both rigorous and uses the latest data available; and Cities should share the responsibility for the whole jobs-and-housing problem, not just the housing piece alone.

Sincerely,

Eric Filseth, Councilmember, City of Palo Alto

Tom DuBois, Vice-Mayor, City of Palo Alto

## Halt the RHNA Process

West Bay Citizens Coalition <westbaycitizenscoalition@protonmail.com>

Fri 11/27/2020 11:06 AM

To: Regional Housing Need Allocation <rhna@bayareametro.gov>

Cc: Therese W. McMillan <tmcmillan@bayareametro.gov>

\*External Email\*

# West Bay Citizens Coalition

Empowering West Bay communities to find

locally driven solutions to regional problems

Dear President Arreguin and ABAG Executive Board,

It is essential that you halt the RHNA process as the methodology must be compatible with Plan Bay Area 2050 Blueprint. This requires compatibility with the regional housing number for the region as a whole along with a formula that is based on "jobs growth in already jobs-rich areas".

The issue is that this has produced a proposal that concentrates jobs allocation (and the associated housing for those jobs) within a narrow geographic region of the South Bay (parts of five cities in Silicon Valley). This has resulted in RHNA numbers in those five cities that call for a 32% increase in the total housing stock in these cities over the next eight years.

This is obviously unattainable and will have severe consequences for residents of the West Bay.

- With both huge job growth and huge housing growth in an area that already has the highest land and office and housing costs in the country, building affordable housing within the West Bay will become next to impossible.
- Infrastructure costs necessary for the expanded population will overwhelm already overburdened budgets.
- New taxes and fees will fall on disproportionately on residents who are struggling to make ends meet.
- Dense worker housing will leave little room for families with children (San Francisco already has the lowest share of its population between the ages of 5 and 17 of any city in the country) as an overcrowded Silicon Valley with an increasing share of dense worker housing is likely to join it.
- The decision-making role of land-owning developers is sure to increase, concentrating centralized decision-making authority to the detriment of nearly all residents.
- Effective construction of Below Market Rate Housing will be hamstrung in a context where existing rules put the excessive cost burdens on working residents rather than expanding new businesses.

- There has been no effective discussion of the longer-term consequences of COVID increasing the share of more effective work at home.

Each of these issues deserve close attention and open public discussion. In fact, the current California Code requires the regional planning process to promote alternative ways to improve jobs and housing imbalances within the region (Code Section 65584 (d) (3)). Neither ABAG nor HCD has had such an open discussion but dismissed any such discussion early in the process.

We urge you to halt and reconsider the RHNA process and work with local governments to resolve these issues with what has been a fundamentally broken process based on flawed assumptions.

Best regards,

The West Bay Citizens Coalition

---

Campbell, Cupertino, Los Altos, Menlo Park, Mountain View,  
Palo Alto, Saratoga, Sunnyvale... and growing

**Eli Kaplan**

---

**From:** Stuart Hansen <[REDACTED]t>  
**Sent:** Thursday, November 19, 2020 10:06 AM  
**To:** Regional Housing Need Allocation  
**Subject:** Housing Mandates

**\*External Email\***

The announced RHNA mandates for Palo Alto (10,058 units) are totally unrealistic, especially in light of the huge changes in work habits brought on by COVID-19.

It is simply not feasible to zone (and build) this number of new housing units without a drastic effect on our city, its people and its infrastructure limits.

We will fight this ridiculous legislation to the bitter end. We have no further use for ABAG membership...you didn't fight to protect our cities from the state. Goodbye. Stuart Hansen, taxpayer/resident

# Proposed RHNA Methodology and Subregional Shares

Patti Fry

Fri 11/27/2020 9:31 AM

To: Regional Housing Need Allocation <rhna@bayareametro.gov>

**\*External Email\***

To whom it may concern:

I admire the intent to balance better the jobs and housing in our communities as well as to support more opportunities and equity. However, I have major concerns about the RHNA (and Plan Bay Area) methodology and allocations, particularly in this unprecedented time:

**1. ABSENCE OF CONSIDERATION OF COVID-19'S LONG-LASTING IMPACTS ON WORK** - The housing needs appear to be based on estimated employment based on history rather than to take into consideration any of the likely lasting effects of COVID. Since it is highly likely that employment practices - particularly regarding remote work - will be changed forever, these will greatly alter commute patterns and the locations where housing is needed. Major employers have already stated this. The pandemic has proven that employees and contractors are able to work far from the bay area, even out of state, and many will not need bay area housing. Thus, commute patterns and locations where housing will be needed will be greatly altered.

*The methodology and the allocations need to take COVID'S long-term employment impacts into account, at a minimum as a revision within two years to the methodology and allocations.*

**2. INADEQUATE CONSIDERATION OF INFRASTRUCTURE** - The allocation method for most new housing does not seem to take into account where major transit hubs are or will be. There is no consideration of available transit for moderate and above housing, seemingly assuming that nearly all new residents will be reliant on vehicles. That can make it difficult for cities to meet climate change goals as well as difficult to support transit with new commuters who will need to rely on autos instead.

It also ignores schools' capacity, water availability, access to groceries and services, and other infrastructure to support new housing and residents. Top-down allocations ignore these practical issues that cities may not be able to solve without regional or state support that has been missing. For example, cities are virtually powerless to improve transit whereas ABAG/MTC is in the driver's seat but not providing solutions.

*The methodology should take infrastructure much more into account.*

**3. TOP-DOWN ALLOCATIONS AT CITY LEVEL** - Cities considered High Resource Areas, oddly whether jobs-rich or more wealthy - may be located adjacent to cities considered to be of lower incomes and "housing rich", but the allocations do not consider this. For example, in southern San Mateo County, such cities not only share boundaries, they cross county lines.

Improved access to opportunity cannot be solved solely by housing policy. It is a factor, but cannot take the place of improved educational and employment opportunities that are not solvable at a single-city level.

*ABAG/MTC should allow, promote, and support (i.e., fund) sub-regional cooperation and planning to better level-out housing demand and supply while also addressing other issues related to opportunity and equity.*

4. **JOBS-HOUSING RATIO** - There is a housing shortage because jobs have been increasing faster than the supply of sufficient housing in which the new workers will live. The PBA and ABAG methodologies address only the housing supply, not the driver of demand. This is a flaw that should be acknowledged and remedied.

Both Land Use Elements and Zoning Ordinances must support Housing Elements. As long as zoning allows more profitable uses (e.g., office in recent years) that add jobs without requiring commensurate housing, the situation will continue to worsen.

Zoning for housing from the state level is an unnecessarily blunt instrument. Zoning at a city level takes into account unique characteristics and the infrastructure of the community.

There are better alternatives that address land use.

*The methodology should focus on jobs/housing ratio at sub-regional levels, and require inclusion of this consideration in Housing Elements and require support through the Land Use Elements and Zoning Ordinances. Further, provide incentives, not sticks, for sub-regions to work it out.*

Respectfully submitted,

Patti Fry

[REDACTED]

November 27, 2020

Mayor Jesse Arreguin, President  
Executive Board, Association of Bay Area Governments  
375 Beale Street, Suite 700  
San Francisco, CA 94105

RE: Proposed RHNA Methodology and Subregional Shares - Support for **Option 8A** using the Plan Bay Area 2050 **Households** Baseline with while addressing **overallocation to unincorporated county areas**

Dear President Arreguin and ABAG Executive Board,

We are a diverse set of organizations and stakeholders from across the region focusing on housing, the environment, and the economy. **We strongly support ABAG's proposed RHNA methodology, known as the "High Opportunity Areas Emphasis & Job Proximity" methodology ("Option 8A") using the Plan Bay Area 2050 Households baseline.** However, we also support a data driven adjustment from unincorporated counties to ensure that the methodology meets statutory requirements to promote infill development and protect the environment.

Option 8A represents a sound compromise born of an in-depth, iterative process at the ABAG Housing Methodology Committee. Over the last year, this diverse group of local elected officials, city and county staff, and community stakeholders engaged in robust discussion on every aspect of the methodology. We appreciate the hard work and compromise of this committee, and the support of ABAG in adopting this recommendation. **We believe an adjustment in the unincorporated county allocations falls within the spirit of this methodology and we look forward to supporting cities, counties and ABAG/MTC staff in making this adjustment.**

**As ABAG staff has demonstrated through a set of performance metrics, Option 8A performs well on all five of RHNA's statutory objectives.** This methodology will help our region improve our environment, reduce our commutes, and ensure every resident has a stable home they can afford:

1. Improve our Environment: Option 8A will help improve our environmental health and mitigate climate change in several ways:
  - a. The "Access to High Opportunity Areas" factor allocates more homes in jurisdictions with high quality economic, educational, and *environmental*

opportunity.<sup>1</sup> This means that more homes, especially affordable homes, will be allocated to jurisdictions with quality jobs, adequately-resourced schools, and minimal pollution.

- b. The 70 percent weight to the “Access to High Opportunity Areas” factor for affordable homes will require jurisdictions that have mostly zoned for single-family homes to now zone for multi-family housing to meet the very low- and low-income allocations.<sup>2</sup> Multi-family buildings, such as apartments, are more efficient uses of our space and they use less energy, water, and land than single-family neighborhoods.<sup>3</sup>
  - c. The Plan Bay Area 2050 Households baseline and job proximity factors allocate more homes near projected job growth, thereby reducing commutes and greenhouse gas emissions.
2. Reduce our Commutes: Option 8A will reduce commutes for *all kinds of jobs*, not just the tech jobs in Silicon Valley, in order to meet the new statutory jobs-housing fit requirement. Jobs-housing fit is a jurisdiction’s ratio of low-wage jobs to homes affordable to those workers.<sup>4</sup> Those workers include farmworkers, service workers at our tourist destinations, homes, offices, and schools, and many more.
  3. Stable Homes for all Bay Area Residents: Residents across the Bay Area have a wide range of income levels but those on the lower end have few options affordable to them. Option 8A helps ensure that there will be new homes affordable in every part of the region.

In short we believe that option 8A is the best methodology in meeting the goals of the RHNA process. However, we understand that there are limitations to the methodology process, particularly around the differences in incorporated and unincorporated jurisdictions. **We are concerned that the high allocations for unincorporated areas, which are primarily rural, agricultural, or open space, will significantly increase pressure to zone for housing in areas at high risk for fire, over PCAs, on productive agricultural lands, or proximate to critical habitat linkages.** We also know that the goals of the recommended methodology and the Plan Bay Area 2050 projections are meant to focus growth within our cities and towns, protecting natural and working landscapes and maintaining existing urban growth boundaries. To that end we support the ongoing efforts of cities, counties, and ABAG/MTC staff in the following areas:

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<sup>1</sup> California Tax Credit Allocation Committee’s [Opportunity Mapping Methodology 2020](#); Environmental opportunity is based on [CalEnviro Screen 3.0](#), which measures the level of environmental health in each census tract, including the extent of air and water pollution.

<sup>2</sup> Cal. Gov. Code Section [65583.2\(c\)\(3\)\(B\)](#).

<sup>3</sup> “[Apartments in buildings with 5 or more units use less energy than other home types](#),” U.S. Energy Information Administration (June 2013).

<sup>4</sup> “[Low-wage Jobs-housing Fit: Identifying Locations of Affordable Housing Shortages](#),” UC Davis (Feb. 2016).

**Subregional methodologies:** Our perspective is that overall, cities and counties should work together to ensure that county land can provide the important open space and farming benefits that we all appreciate, and cities can provide the homes, jobs, and services that we need. We support the efforts of Napa and Solano Counties in their subregional processes and we recommend that in future cycles, more counties enter into similar agreements.

Data-based city-county adjustments: although not all counties have official subregional agreements, we're heartened to see the cities, counties, and regional agency staff working hard to identify ways to reallocate units away from unincorporated areas, fulfilling the statutory RHNA goals of protecting environmental and agricultural resources. We encourage cities around the region to work collaboratively with their county counterparts to ensure we are all doing our part to accommodate the homes we need while protecting our rural areas that provide much needed agricultural, fire resilience, recreational, and habitat benefits. With this adjustment, we request that the additional housing allocations for unincorporated counties across the region be significantly reduced to maintain consistency with climate goals and strategies with Plan Bay Area and the State of California.

Thank you for working with us to make our region more resilient.

## **Organizations**

Amanda Brown Stevens  
**Greenbelt Alliance**

Laura Foote  
**YIMBY Action**

Alice Kaufman  
**Green Foothills**

Todd David  
**Bay Area Housing Advocacy Coalition**

Will Richards  
**Sonoma County Transportation and Land Use Coalition**

David Watson  
**Mountain View YIMBY**

Charlotte Williams  
**Napa Vision 2050**

Kelsey Banes  
**Peninsula for Everyone**

Jen Klose  
**Generation Housing**

**Urban Environmentalists**

**East Bay for Everyone**

Michael Allen  
**Sonoma County Conservation Action**

**South Bay YIMBY**

Aaron Eckhouse  
**California YIMBY**

## Individuals

Daniela Ades, San Francisco  
Kirsten Aguila, San Jose  
Andrew Aldrich, Oakland  
Patricia Bias, Brentwood  
Paris Badat, Oakland  
Rita Bagala, Santa Rosa  
Carol Barge, Napa  
Chaplain Rev Bear, San Jose  
Emily Blanck, Walnut Creek  
Aiyana Bodi, San Francisco  
Nancy Boyce, San Rafael  
Jennifer Brayton, Santa Rosa  
Craig Britton, Los Altos  
Matthew Carranza, Livermore  
Garth Casaday, Richmond  
Andrew Chao, Danville  
Gail Cheeseman, Saratoga  
Michael Chen, San Francisco  
Kathryn Choudhury, Moraga  
Charles Collins, Sebastopol  
MollyCox, Sunnyvale  
Nora Cullinen, Oakland  
Virginia Cummins, Union City  
Changlin Dillingham, Walnut Creek  
Kathleen Dovidio, Sebastopol  
Andrew Fister, San Francisco  
Paul Fritz, Sebastopol  
Joshua Geyer, Alameda  
Joanna Gubman, San Francisco  
Michael Henn, Piedmont  
Lawrence Jensen, Oakland  
Robert Johnson, Berkeley  
Stephanie Klein, Palo Alto  
Stephen Knight, Berkeley  
Phillip Kobernick, San Francisco  
Michael Lampered, San Francisco  
Maureen Lahiff, Oakland  
Libby Lee-Egan, Berkeley  
Bill Leikam, Mountain View  
Nora Linville, Windsor  
Kevin Ma, Palo Alto  
Kimberly Marks Martinez  
Sandra Martensen, Santa Rosa  
Ben Martin, Mountain View  
Kai Martin, Pacifica  
Deborah Morrison, Benicia  
Mark Mortensen, Santa Rosa  
Jana Muhar, Santa Rosa  
Sam Naifeh, San Mateo  
Tim O'Brien, Belmont  
Sara Ogilvie, San Francisco  
Carole Ormiston, Sausalito  
Tara Parker-Essig, Oakland  
Gaylon Parsons, Alameda  
Richard Patenaude, Hayward  
Christopher Pederson, San Francisco  
Claire Perricelli, Eureka  
Steve Price, Berkeley  
Aaron Priven, Albany  
Anna Ransome, Graton  
Kyra Rice, Willits  
Kevin Riley, Antioch  
Chris Rinaldi, Healdsburg  
Rupal Sanghvi, Berkeley  
Judith Smith, Oakland  
Erica Stanojevic, Santa Cruz  
Wendy Stock, Berkeley  
Zack Subin, San Francisco  
Edward Sullivan, San Francisco  
Trish Tatarian, Santa Rosa  
Milo Trauss, San Francisco  
Atisha Varshney, Santa Clara  
Barbara Weinstein, Los Altos  
Ann Wettrich, Oakland  
Gretchen Whisenand, Santa Rosa  
Heather Wooten, Oakland  
Sabina Yates, Benicia  
Marylee Guinon, Sebastopol  
Dale Riehart, San Francisco  
Jesssica Woodard, Berkeley  
Pam Zimmerman, Santa Rosa

## Reject RHNA Methodology

anastasia Yovanopoulos <[REDACTED]>

Fri 11/27/2020 7:22 AM

To: Regional Housing Need Allocation <rhna@bayareametro.gov>

**\*External Email\***

November 27, 2020

Mayor Jesse Arreguin, President  
ABAG Executive Board  
c/o ABAG & MTC Public Information Office  
[RHNA@bayareametro.gov](mailto:RHNA@bayareametro.gov)

Dear President Arreguin and ABAG Executive Board Members:

I urge you to reject the proposed RHNA Methodology until the accuracy of the housing numbers is confirmed, the assumptions are aligned with the reality of state (not national) trends in a post-COVID world; and the legality of the decision is determined.

1. California's housing need isn't as great as the state claims. It is irresponsible to approve the Methodology until the approach to determine the numbers is proven reliable.

The Embarcadero Institute's report "["Double Counting in the Latest Housing Needs Assessment"](#)" (September 2020) finds, "Use of an incorrect vacancy rate and double counting, inspired by SB-828, caused the state's Department of Housing and Community Development to exaggerate by more than 900,000 the units needed in SoCal, the Bay Area and the Sacramento area."

"The state's approach to determining the housing need must be defensible and reproducible if cities are to be held accountable. Inaccuracies on this scale mark the fact that cities and counties are surpassing the state's market-rate housing targets but falling far short in meeting affordable housing targets."

2. The assumptions of the RHNA Methodology are unreliable. It is irresponsible to approve the Methodology until the assumptions are aligned with the reality of COVID-19, remote work, changing transportation patterns, an exodus from California, and deepening economic upheaval.

3. RHNA Methodology that usurps local authority endowed to elected City Councils or Boards of Supervisors will not go unchallenged. Nor will community leaders, homeowners, and renters stand by as HCD foists irrational, wildly inflated housing quotas on communities. [CalMatters columnist Dan Walters](#), reporting about the Embarcadero Institute report writes, "resistance has developed among affected local governments and officials are mulling whether to challenge them in court."

Please reject the unreliable RHNA Allocation Methodology. Take time to collaborate with locally elected officials and community leaders to get it right. With accuracy and collaboration, housing needs can be solved.

Sincerely,  
Anastasia Yovanopoulos  
San Francisco Tenants Union, member

## Reject RHNA methodology

Kathy Jordan <[REDACTED]>

Thu 11/26/2020 9:53 PM

To: Regional Housing Need Allocation <rhna@bayareametro.gov>

**\*External Email\***

***Summary:*** *I urge you to reject the proposed RHNA Methodology until the accuracy of the housing numbers is confirmed, the assumptions are aligned with the reality of state (not national) trends in a post-COVID world; and the legality of the decision is determined.*

*Thank you.*

*Best,*

*Kathy Jordan*

## Repair the RHNA Process!

Michael Nash <[REDACTED]>

Thu 11/26/2020 2:26 PM

To: Regional Housing Need Allocation <rhna@bayareametro.gov>

**\*External Email\***

Dear ABAG Executive Board Members:

Summary: Reject the proposed RHNA Methodology until the accuracy of the housing numbers is confirmed, the current assumptions are modified to align with the reality of state (not national) trends in a post-COVID world; and the legality of the decision is determined.

1. California's housing need isn't as great as the state claims. It is irresponsible to approve the Methodology until the approach to determine the numbers is proven reliable.

The Embarcadero Institute's report "Double Counting in the Latest Housing Needs Assessment" (September 2020) finds, "Use of an incorrect vacancy rate and double counting, inspired by SB-828, caused the state's Department of Housing and Community Development to exaggerate by more than 900,000 the units needed in SoCal, the Bay Area and the Sacramento area."

"The state's approach to determining the housing need must be defensible and reproducible if cities are to be held accountable. Inaccuracies on this scale mark the fact that cities and counties are surpassing the state's market-rate housing targets but falling far short in meeting affordable housing targets."

2. The assumptions of the RHNA Methodology are unreliable. It is irresponsible to approve the Methodology until the assumptions are aligned with the reality of COVID-19, remote work, changing transportation patterns, an exodus from California, and deepening economic upheaval. The impact of SB-828 needs to be removed to make this a fair process.

3. RHNA Methodology that intends to usurp local authority endowed to elected City Councils or Boards of Supervisors will not go unchallenged. They cynic are noting that these targets are not intended to succeed, but rather to provide an argument that local government is the problem in order to strip local government of their role in zoning. Community leaders, homeowners, and renters are appalled as HCD foists irrational, wildly inflated housing quotas on communities. CalMatters columnist Dan Walters, reporting about the Embarcadero Institute report writes, "resistance has developed among affected local governments and officials are mulling whether to challenge them in court."

I understand 31 cities in Southern California have written in protest of this RHNA process. How can this be acceptable to Northern California?

**THERE IS A BETTER WAY!** Reject the unreliable RHNA Allocation Methodology. Take time to collaborate with locally elected officials and community leaders to get it right. With accuracy and collaboration, housing needs can be solved.

Sincerely,

Michael Nash



## Development plans

winreis@gmail.com <[REDACTED]>

Thu 11/26/2020 1:39 PM

To: Regional Housing Need Allocation <rhna@bayareametro.gov>

**\*External Email\***

I urge you to reject the proposed RHNA Methodology until the accuracy of the housing numbers is confirmed, the assumptions are aligned with the reality of state (not national) trends in a post-COVID world; and the legality of the decision is determined

## Housing changes changed due to Covid

Andrea McCutchin <[REDACTED]>

Thu 11/26/2020 12:21 PM

To: Regional Housing Need Allocation <rhna@bayareametro.gov>

\*External Email\*

Dear Board Members,

Now is not the time to be doling out more mandated housing numbers to cities. Any development mandates given during this time could only benefit developers and labor unions.

We are in a time of huge transition with Covid-19. Covid will change tge way and where future generations will work - remotely, and not in a high density, congested city. Everyone knows someone who is leaving the Bay Area. Rents are plummeting in smaller cities and San Francisco. If rents are discounted then multiple months of free rent are included in the back end of a lease. You can't give away new units, whether rental or for purchase if they are a condo or smaller. NO ONE WANTS IT. They want the space that R1 housing provides - and they are moving to find it.

You will kill the souls of these cities to mandate development that most developers can't get to pencil out if they have no takers.

The time to be responsible is now. We can not act as if this change is not here - and making huge ripples. We need to see what the reality is in regard to need before requiring new mandates.

Most recently, the EDD acted without using a magnifying glass to carefully examine their actions and consequences. I ask that you be cognizant of the moves you make in this turbulent time, to ensure they don't cause the kind of regret that more consideration (and TIME) could easily prevent.

Sincerely, Andrea Mccutchin

Sent from my iPhone

*Tag: Proposed RHNA Methodology and Subregional Shares*

Fred Allebach  
Member of the Sonoma Valley Housing Group  
11/25/20  
To: ABAG-MTC Public Information Office  
e-mail to [RHNA@bayareametro.gov](mailto:RHNA@bayareametro.gov)  
Comments due 11/27

**Public comment on 6<sup>th</sup> Cycle Proposed RHNA Methodology and Draft Subregional Shares of Regional Housing Need.**

**Abstract:** For the 6<sup>th</sup> RHNA cycle, I strongly suggest keeping the Sonoma County total Option 8A number of 17,543 for whatever scenario. The County needs to buck up on housing. I suggest shifting a large portion or all of Sonoma County's Option 8A unincorporated allocation of 5,257 back onto County cities. Shift the approximately 230 City of Sonoma growth management ordinance units in its southern sphere of influence from the County to the City's RHNA Option 8A allocation. With Sonoma's existing Option 8A allocation of 330 plus 230 from its sphere, this shift would total of 560 for a revised City Option 8A number. A \$25,000 City housing study resulted in an informed citizen's 6<sup>th</sup> cycle recommendation of 725 units with 52% being deed restricted; there is local backing for higher numbers.

Dear ABAG Regional Planning Committee,

I see the RHNA process as caught between conflicting priorities. The clear need to address Bay Area segregation and gentrification negatives runs up against widely accepted "smart growth" theory. Smart growth memes, along with LAFCO law, artificially tight spheres of influence, UGBs, green separators, wildland urban interface arguments, and in-city protective zoning all serve to rigidly limit chances to integrate Bay Area municipalities. All the great HCD, ABAG, and RHNA social equity goals run up against the latter intentional blockades plus local, in-city protectionism and character NIMBYism. In aggregate, social equity in housing runs up against Sonoma's Green Checkmate.

Option 8A reduced the City of Sonoma's RHNA allocation from approximately 480 to 330, but it also gave Sonoma County as a whole an allocation of 17,543. I'm writing now encourage you to keep the 17,543 number and **shift a large portion or all of Sonoma County's Option 8A, 5,257 unincorporated allocation back onto County cities.**

I wrote a public comment in support of the pre-Option 8A RHNA methodology that had given the City of Sonoma the 480 number. I cited multiple policy and data-driven social equity supporting documents and local studies showing the extent of local segregation in Sonoma Valley, where the Springs area stands out like a sore thumb of poverty amidst an island of Sonoma's wealth.

Tax Credit Opportunity Area maps (2020 and 2021) are frankly not granular and accurate enough to show the actual wealth disparities in Sonoma Valley. The maps show a High Opportunity area (Buena Vista/ Lovall Valley Rd area) that can't possibly be developed for any housing equity because of UGB and SOI limitations, even though McMansions are going in this area on city water. Do wealthy foothill areas just get to skate on equity? Who pays their equity debt?

The upward wealth trend here in Sonoma and surrounding unincorporated foothill areas has vastly increased Sonoma's predominantly white property owners home values, drawn in Silicon Valley speculators. Incentives for local protectionism have increased. This while local municipal fragmentation between the City and Springs keeps the Springs on the other side of the tracks in a plantation kind of arrangement.

Smaller cities in Sonoma County have all the reasons why to not take on an aggressive integration program, and these reasons center on anti-growth character and property value protection. These are the exact same reasons that has led to some of the worst segregation in the country in the Bay Area. All the green protection, NIMBYism, and smart growth adds up to the liberal's rationale for segregation.

The facts of segregation are plain to see on the ground in Sonoma Valley. From 2000-2020, the City of Sonoma underbuilt moderate, low and very low units by 236 and overbuilt above moderate by 293, these numbers are verbatim from RHNA website data. This while nearly half of the 15,000 person unincorporated Springs population lives in Census-demonstrable poverty. The vastly disproportional Covid-19 impact on local Latino population "essential workers" is a clear indicator of the inequity here, and why the City of Sonoma needs to pay its past RHNA debt and take more of its fair share of the local housing burden going forward.

In the city's own \$25,000 Housing Our Community series, the public recommended 725 new units for the next RHNA cycle with 52% being deed-restricted affordable.

It's time to eat into some of the very ample green space in Sonoma County. There is enough open space to sacrifice some city sphere of influence areas by annexing them into cities. Nothing but half measures will happen if ABAG and the state does not force a more aggressive race and class integration program.

**For the 6<sup>th</sup> RHNA cycle, I strongly suggest keeping the total Option 8A number of 17,543 for Sonoma County.** Let the County shift a lot or all of its unincorporated allocation to its cities. Make cities deal with annexations into their spheres of influence. Infrastructure extensions are reasonable; cities have to figure out how to pay for it; otherwise we are all condemned to an apparently reasonable world of suburban apartheid. Open the castle gates here! We are not talking "growth" and "sprawl"; we are talking re-accounting for the displaced working class, and excluded brown-skinned people. Higher RHNA numbers means Sonoma is paying societal debts that need to be paid.

The Option 8A unincorporated Sonoma County number of 5,257 will put tremendous pressure on unincorporated urban service areas like the Springs if they're asked to build that much housing. The Springs area has 166 affordable units in process now that will likely be permitted before the current RHNA is certified. The Springs is also smack dab up against the wildland urban interface. This area is already cost burdened and limited geographically.

It would be fairer if cities like Sonoma took on the burden they have heretofore avoided. It would be sensible if future development here went out onto the valley floor, away from overt mountain front fire danger, and on a clear connective axis with the local county Sanitation District infrastructure. Without aggressive rezoning, and in-city affordable housing development by right with concomitant CEQA streamlining to neutralize NIMBY protectionism, the only clear pragmatic path to meet higher RHNA numbers is through high density sphere of influence annexations.

**I suggest shifting the approximately 230 City of Sonoma growth management ordinance units in its southern sphere of influence, from the County to the City's Option 8A 330 allocation, for a total of 560 for the city's revised Option 8A number. 560 is 165 units less than the 725 units an engaged public here already recommended.**

[REDACTED]

---

**From:** Don Teeter [REDACTED] >  
**Sent:** Thursday, November 19, 2020 11:05 AM  
**To:** Regional Housing Need Allocation  
**Subject:** RHNA

**\*External Email\***

Enough of this. You have already made my neighborhood all but unlivable because of unrealistic low cost expansions. I live on Louis Rd and it sometimes almost impossible to cross the street. There are seven children living within five houses of mine and it is just a matter of time that a disaster may occur. Palo Alto does not need any new building, low cost or not.

Don Teeter

[REDACTED]

## No Mandates for Cities During This Time!

Lisa Taner <[REDACTED]>

Thu 11/26/2020 9:31 AM

To: Regional Housing Need Allocation <rhna@bayareametro.gov>

**\*External Email\***

Dear Board Members,

Now is not the time to be doling out more mandated housing numbers to cities. Any development mandates given during this time could only benefit developers and labor unions.

We are in a time of huge transition with Covid-19. Everyone knows someone who is leaving the Bay Area. Rents are plummeting in smaller cities and San Francisco. You can't give away new units, whether rental or for purchase if they are a condo or smaller. NO ONE WANTS IT. They want the space that R1 housing provides - and they are moving to find it.

You will kill the souls of these cities to mandate development that most developers can't get to pencil out if they have no takers.

The time to be responsible is now. We can not act as if this change is not here - and making huge ripples. We need to see what the reality is in regard to need before requiring new mandates.

Most recently, the EDD acted without using a magnifying glass to carefully examine their actions and consequences. I ask that you be cognizant of the moves you make in this turbulent time, to ensure they don't cause the kind of regret that more consideration (and TIME) could easily prevent.

Sincerely,

Lisa Taner  
4th Generation Bay Area



## TRAINWRECK

Problems Created by ABAG's RHNA Housing Allocations for Unincorporated Santa Clara County



### Rural Santa Clara County Is Threatened by RHNA-Related Development

Over 4,100 new housing units should be built within unincorporated areas of Santa Clara County – more than half of them within areas that are currently rural – according to the Regional Housing Needs Assessment (RHNA) process administered by the Association of Bay Area Governments (ABAG).

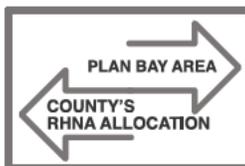
That's almost 4,000 units more than the County's previous allocation during the last RHNA round – and it poses a serious threat to our ability to address current challenges and achieve future goals, including those related to increasing climate resilience.



### It's a Land Use and Environmental Trainwreck in the Making

ABAG's ill-advised RHNA housing allocation to the County, if not reduced to a reasonable level, will create chaos and uncertainty regarding longstanding, countywide urban development and rural area land use policies that support Plan Bay Area's goals.

ABAG's proposed RHNA allocation could lead to a public policy "trainwreck" that accomplishes nothing – not for housing affordability, not for climate resilience, not for social and economic equity, not for Plan Bay Area, and not for Santa Clara County.



### RHNA Allocation Runs Contrary to Goals of Plan Bay Area

ABAG's Plan Bay Area calls for accommodating the region's future growth and development within existing urban areas at higher densities that can be better served by transit. It also discourages new greenfield development on our farmlands and fire-prone hillsides. It is intended to achieve a variety of social, economic, and environmental goals.

If Santa Clara County were to plan for rural area development in accordance with its RHNA allocation, the results would be the exact opposite of Plan Bay Area's basic goals.



### ABAG's RHNA Process is Broken

ABAG's RHNA process has a fundamental flaw – it fails to take into account Santa Clara County's unique, longstanding countywide urban development policies that state that urban development should occur only within cities – not in rural unincorporated areas under the County's land use jurisdiction. It treats the County as though it were a city.

Building a significant amount of new housing units in rural unincorporated areas would be directly contrary to basic urban development policies agreed to by the County, its 15 cities, and the Local Agency Formation Commission (LAFCO) almost 50 years ago.



### It's ABAG's Problem to Fix

It has been suggested that the County should solve this RHNA problem by asking its cities to voluntarily accept its RHNA allocation. That's putting the responsibility on the County to solve a problem created by a flaw in ABAG's RHNA process.

If that voluntary approach fails to bring the County's allocation down to levels achievable within the framework of current, longstanding, countywide urban development policies, ABAG should act responsibly and reallocate the great majority of the County's unincorporated areas RHNA allocation to urban areas within cities.

ABAG created the problem. ABAG needs to own it. ABAG needs to fix it.

[REDACTED]

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**From:** Bill Paisley <[REDACTED]>  
**Sent:** Thursday, November 19, 2020 12:45 PM  
**To:** Regional Housing Need Allocation  
**Cc:** Sharon Rushton  
**Subject:** Proposed RHNA Methodology  
**Attachments:** ACTION ALERT! Send letters to ABAG Executive Committee regarding the ABAG's Proposed RHNA Methodology (1).zip

**\*External Email\***

President Arreguin, ABAG

I agree and endorse the letter written by Sharon Rushton, Chairperson of the Sustainable TamAlmonte organization to Mayor Jesse Arreguin, President ABAG. A copy of the letter is attached.

Bill Paisley.

[REDACTED]

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**From:** Fred & Jean Schmidt [REDACTED] >  
**Sent:** Thursday, November 19, 2020 3:39 PM  
**To:** Regional Housing Need Allocation  
**Subject:** I don't get it?

**\*External Email\***

Our traffic suck, we have major water issues, and brown and black out because of our power issues.

Who on earth wants' to make things worse?

In ten years the peninsula will look like a third world country.

Fred Schmidt



**From:** Heather [REDACTED] >  
**Sent:** Tuesday, November 3, 2020 10:41 AM  
**To:** Fred Castro <fcastro@bayareametro.gov>  
**Subject:** Public Comment on Housing Allocation

**\*External Email\***

Dear Association of Bay Area Governments (ABAG):

Please STOP building in the city of Alameda, California. I like living in a small town.

Sincerely,  
Heather Zacks

[REDACTED]

[REDACTED]

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**From:** c.dreike <[REDACTED]>  
**Sent:** Saturday, November 21, 2020 8:12 PM  
**To:** Regional Housing Need Allocation; Therese W. McMillan; Alix Bockelman; Andrew Fremier; Brad Paul; Brian Mayhew  
**Subject:** Proposed RHNA Methodology and Subregional Shares

**\*External Email\***

**Therese McMillan, Alix Bockelman, Andrew B. Fremier, Bradford Paul, Brian Mayhew**

The ABAG staff should be absolutely ashamed of their behavior involving the RHNA allocations. The legislature has sent you poorly thought out rules, regulations and laws. ABAG is there for the benefit of the people, not the legislature. ABAG should therefore refuse to distribute the RHNA allocations until the legislature fixes the problems of which the staff is well aware.

Regards,  
Chris Dreike

[REDACTED]

--

Scientists seek to understand what is, while engineers seek to create what never was. As the "Bad Astronomer" Phil Plait says, "Teach a man to reason, and he can think for a lifetime."

## Eli Kaplan

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**From:** c.dreike <c.dreike@verizon.net>  
**Sent:** Tuesday, November 24, 2020 7:54 PM  
**Subject:** Important message about your neighborhood

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### \*External Email\*

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Whether you are a homeowner, renter or apartment dweller, the information below is to let you know that the price of rent and homeownership in California will **increase** due to the legislature's desire to **control housing**. If you don't live in California, beware as Congress is working on housing bills that will be as onerous as those in California. See the YIMBY bills HR4351 and S1919.

The youtube link below is a zoom video presentation by Torrance City Council Member Mike Griffiths. You don't need to watch to whole thing, just the first 12-13 minutes to understand what the California State Legislature is trying to do, which is to take away single family home neighborhoods and drive up the cost of homes and apartments even further, under the guise of affordable housing.

Whether you live in a house or an apartment, I hope you will take a stand on this issue as everything the legislature is doing will drive up the cost of housing. As far as I can tell, the game is to satisfy developers desire to build and to increase property values as fast as possible to increase property taxes to fill the gaping financial holes in the state and local budgets.

Call or write your **state** and **federal** representatives and ask them to vote NO on the housing and YIMBY bills.

Here is the link to Torrance City Council Member Mike Griffiths' video:  
<https://www.youtube.com/watch?v=Px8Z9nWX6-4&feature=youtu.be>

If you agree with what you see and hear, please forward this email to all your friends and relatives, especially those in California.

You can get more information at:

[www.facebook.com/localcontrolca/](http://www.facebook.com/localcontrolca/)

If you would like to volunteer to help CCLC , email me back. We have volunteers from around the state.

CCLC is having great success in that hundreds of local electeds have now joined with us in agreement.

Ask your city council to join CCLC to oppose the state takeover of local control.

And:

[www.LivableCalifornia.org](http://www.LivableCalifornia.org)

Regards,  
Chris Dreike  
for California Cities for Local Control  
310-214-2175

# CALIFORNIA CITIES



# FOR LOCAL CONTROL



[REDACTED]

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**From:** John Futini <[REDACTED]>  
**Sent:** Monday, November 23, 2020 4:26 PM  
**To:** MTC-ABAG Info  
**Subject:** Re: Too many houses for Napa.

**\*External Email\***

Hello ABAG,

As a longtime City of Napa resident, since 1965, I am putting in my "two cents' worth" in regard to the 3,816-housing unit order forced upon Napa County. Napa County is one of the few precious areas in which unique ecology and unparalleled natural vistas remain on the periphery of the metropolitan bay area. Nearly 4,000 new housing units will impair the better-quality of life for which far too much population growth has already done to most bay area cities and counties. ABAG needs to shelve its above decree. Thank you for your kind attention.

Sincerely yours,

John Stephen Futini, Longtime Napa resident.

[REDACTED]

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**From:** Judy Schriebman [REDACTED]  
**Sent:** Wednesday, November 25, 2020 10:09 AM  
**To:** Regional Housing Need Allocation  
**Subject:** RHNA numbers

**\*External Email\***

I strongly urge you to reject the proposed RHNA Methodology until the accuracy of the housing numbers is confirmed, the assumptions are aligned with the reality of *state* (not national) trends in a post-COVID world; and the legality of the decision is determined.

At this point, we are at risk of ruining our precious environment due to the greed of developers, builders and the banks and the ignorance of people in general on the unsustainability of perpetual growth.

Judy Schriebman  
[REDACTED]

[REDACTED]

---

**From:** Richard Placone [REDACTED] >  
**Sent:** Wednesday, November 25, 2020 11:55 AM  
**To:** Regional Housing Need Allocation  
**Subject:** Fw: Reject RHNA Methodology

**\*External Email\***

*We urge you to reject the proposed RHNA Methodology until the accuracy of the housing numbers is confirmed, the assumptions are aligned with the reality of state (not national) trends in a post-COVID world; and the legality of the decision is determined.*

Richard and Jeanne Placone  
[REDACTED]

[REDACTED]

---

**From:** Barry Smith [REDACTED] >  
**Sent:** Wednesday, November 25, 2020 12:28 PM  
**To:** Regional Housing Need Allocation  
**Subject:** Housing Requirements and Local Communities

**\*External Email\***

Dear President Arreguin and ABAG Executive Board Members:

I am totally confused by the process and rationale by which local communities are required to build more housing, even if that means running roughshod over local building and zoning requirements.

If local communities are willing to accept their local limitations, aren't the citizens voting for what they want?

Perhaps you could work more closely with the local communities to understand their wishes, rather than telling them what they need to do.

Regards,  
Barry Smith

Barry Smith | [REDACTED]

**Eli Kaplan**

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**From:** CoCoTax <denise@cocotax.org>  
**Sent:** Wednesday, November 25, 2020 1:18 PM  
**To:** Regional Housing Need Allocation  
**Subject:** RHNA Methodology

**\*External Email\***

*I urge you to reject the proposed RHNA Methodology until the accuracy of the housing numbers is confirmed, the assumptions are aligned with the reality of state (not national) trends in a post-COVID world; and the legality of the decision is determined.*

*Contra Costa Taxpayers Association  
Susan L Pricco, President*



November 18, 2020

Mayor Jesse Arreguín, President  
Executive Board, Association of Bay Area Governments  
375 Beale Street, Suite 700  
San Francisco, CA 94105

RE: Comments on Implications of the new Bay Area “RHNA” and Support for Option 8A RHNA Methodology using the Plan Bay Area 2050 Households Baseline with the Equity Adjustment

Dear President Arreguín and ABAG Executive Board,

The Council of Community Housing Organizations is a coalition of 23 affordable housing developers and advocates in San Francisco. We are also part of the regional Six Wins for Social Equity Network. CCHO Co-Director Fernando Martí was an appointed member of ABAG’s Housing Methodology Committee for the RHNA Update process.

**CCHO strongly supports ABAG’s proposed RHNA methodology, known as the “High Opportunity Areas Emphasis & Job Proximity” methodology (“Option 8A”), using the Plan Bay Area 2050 Households baseline, with an equity adjustment.**

While no methodology is perfect, Option 8A represents a sound compromise from the ABAG Housing Methodology Committee. ABAG adopted the Committee’s recommendation due to its strong performance on the statutory objectives of RHNA. A clear majority of the Housing Methodology Committee also supported an equity adjustment. The HMC met every month for a whole year, diving deep into the technical details of all the possible factors and metrics of evaluation and making compromises along the way. This was a significant investment. We urge you to continue to respect the integrity of this process and move forward with the Committee’s recommendation, with the equity adjustment. We strongly urge ABAG to reject alternatives, such as changing the baseline, that perform worse on the statutory objectives’ performance metrics.

The “Access to High Opportunity Areas” factor allocates more homes in jurisdictions with quality jobs, adequately-resourced schools, and minimal pollution. This will require jurisdictions that have mostly zoned for single-family homes to now zone for multi-family housing to meet the very low- and low-income allocations.

Furthermore, at the Housing Methodology Committee’s final meeting on September 18, more than half of the committee supported an equity adjustment to ensure that each exclusive jurisdiction receives a share of the region’s very low and low-income allocations that is at least proportional to the jurisdiction’s share of the region’s total number of households. Many members of the ABAG Executive

Board also stated at the October 15th hearing that meeting the statutory objectives of RHNA and advancing racial equity were critical and worthy of potential improvements to the methodology.

The purpose of the RHNA is to ensure every city and county does its fair share to accommodate the region's housing growth over 8 years. The last RHNA cycle perpetuated patterns of racial segregation, allocating a greater share to the big three cities, far above the regional share of households, and allocating a far lower share to the suburbs. Now is the time to adopt a RHNA that will ensure inclusivity and prosperity for everyone -- by combating racial segregation.

That said, **there are significant concerns with implications of this new Bay Area RHNA for urban gentrifying communities** that we must not forget in the shadow of this current wrangling over methodology options. Without acknowledging Sensitive Communities at the local level, which has now been definitely analyzed by UC Berkeley's Urban Displacement Project ([sensitivecommunities.org](http://sensitivecommunities.org)) and the potential consequences of SB35 by-right market-rate development exacerbating land costs in gentrifying communities, we may see regional segregation and displacement increasing at a faster rate than the region is able to open new opportunities in some high-opportunity areas. This would be a perverse outcome of the RHNA Update that no amount of methodological tweaking at the ABAG level could mitigate nor through local housing element updates which have even less influence on these numbers handed down by The State. The potential threats to low-income and communities of color vulnerable to gentrification and economic and racial displacement from the paired implications of SB35 and SB828 as they were designed in the State Legislature cannot be overstated as we go forward.

For the moment, this decision on adopting Option 8A will play a significant role in how our region moves forward out of this pandemic and into a more equitable future. We need every jurisdiction in the region to do its fair share in meeting the region's housing needs, helping to remove barriers to housing choice for people of color. These two issues, opening opportunities in high-resource areas and combatting regional displacement and segregation, will help our Bay Area residents choose their home based on their needs, preferences, and access to resources, not their racial or economic background.

Sincerely,

A handwritten signature in blue ink that reads "Fernando Martí". The signature is written in a cursive style with a horizontal line extending to the right.

Fernando Martí  
Co-Director, Council of Community Housing Organizations  
Member, Housing Methodology Committee of ABAG



Tomiquia Moss  
415-669-0344  
tmoss@allhomeca.org

November 18, 2020

Mayor Jesse Arreguin, President  
Executive Board, Association of Bay Area Governments  
375 Beale Street, Suite 700  
San Francisco, CA 94105

RE: Proposed Regional Housing Needs Allocation (RHNA) Methodology and Subregional Shares -  
**Support for Option 8A using the Plan Bay Area 2050 Households Baseline with the Equity Adjustment**

Dear President Arreguin and ABAG Executive Board,

On behalf of All Home, we are writing to provide comment on the proposed RHNA Methodology and subregional shares for ABAG RHNA Cycle 6.

All Home is a Bay Area organization that advances regional solutions towards disrupting the cycles of poverty and homelessness and creating more economic mobility opportunities for extremely low-income (ELI) people. We work across counties, sectors, and silos to advance coordinated, innovative solutions and build a movement to challenge the status quo that perpetuates homelessness.

We strongly support ABAG's proposed RHNA methodology, known as the **"High Opportunity Areas Emphasis & Job Proximity" methodology ("Option 8A")**, **but believe the methodology should be amended to include the equity adjustment** to more fully meet the statutory objective of affirmatively furthering fair housing.

This adjustment will result in thousands more affordable units in high-opportunity neighborhoods. It is imperative that we hold ourselves and each other accountable to create a more inclusive Bay Area, one that redresses racial disparities that were caused by more than a century of racially motivated zoning and real estate development practices that promoted segregation and lack of access to opportunity. All Home can support nothing less than a methodology that creates access for all residents to have a safe and affordable home and equal access to environmental, economic, and educational opportunities.

ABAG adopted the Housing Methodology Committee's recommendation due to its strong performance on the statutory objectives of RHNA. A majority of the Committee also supported an equity adjustment. The RHNA process offers our region a tangible opportunity to actively plan for our future housing needs

for the next eight years — while actively designing strategies to address existing housing affordability, patterns of residential segregation, and exclusionary zoning practices.

**Therefore, we stand with a strong and diverse coalition of stakeholders to strongly urge ABAG to respect the integrity of this process and move forward with the Committee's recommendation, including the equity adjustment.** We request that you reject alternatives that fail to meet the moral imperative of our time, such as changing the baseline, that perform worse on the statutory objectives' performance metrics and will likely result in further displacement, segregation and racial exclusion. Alternative proposals that use Plan Bay Area 2050 Growth as the baseline, for example, fail to meet the statutory objective to affirmatively further fair housing and will exacerbate our region's affordable housing crisis and fail to hold jurisdictions accountable for producing their fair share of affordable housing. Now is the time for the whole Bay Area, all cities and counties, to come together to right the wrongs of the past, move to a fairer and equitable future, and hold each other accountable for producing a fair distribution of affordable housing.

ABAG's proposed methodology with the Equity Adjustment will help us get there. For these reasons, All Home strongly supports **Option 8A** using the Plan Bay Area 2050 **Households** Baseline with the **Equity Adjustment**.

Thank you again for the opportunity to provide feedback.

Sincerely,

*Tomiquia Moss*

Tomiquia Moss  
CEO and Founder

Cc: ABAG Executive Board



November 20, 2020

Mayor Jesse Arreguin, President Executive Board  
Association of Bay Area Governments  
375 Beale Street, Suite 700  
San Francisco, CA 94105

Submitted via email to [RHNA@bayareametro.gov](mailto:RHNA@bayareametro.gov)

**Re: Proposed RHNA Methodology and Subregional Shares - Concern Regarding Overallocation to Unincorporated Counties**

Dear President Arreguin and ABAG Executive Board,

The undersigned organizations write today to express concern regarding the significantly increased allocations to unincorporated areas in the recommended housing allocation methodology - Option 8A - for the Regional Housing Needs Allocation (RHNA) Cycle 6 and its potential to impact the natural and working lands of our region. Thank you for this opportunity to communicate our views.

Since its first adoption in 2013, Plan Bay Area has served as the urban growth blueprint for the Bay Area, which focuses regional growth around transportation infrastructure through its Priority Development Area (PDA) program, and strives to provide equitable outcomes to all Bay Area residents. The Priority Conservation Area (PCA) program has created avenues to enhance regionally significant natural landscapes, public access, and habitats surrounding the built environment, and to provide respite for the densifying PDAs (Attachment 1). The vision set out by Plan Bay Area is one that seeks balance between growth in the built environment and sound stewardship of the vital resources provided by our natural and working lands, such as clean air, clean water, food, and access to nature. These Priority Conservation Areas also provide critical ecosystem services to support denser urban and suburban areas that recharge groundwater aquifers, uptake millions of tons of carbon from the atmosphere while producing oxygen, reduce downstream flooding risk, maintain clean fresh water within creeks and waterways, support local food production, and protect sensitive/rare/endemic plants and wildlife including key pollinators. The vision set out by Plan Bay Area is one that seeks balance between growth in the built environment and the vital resources and services provided by our natural and working lands.

Supporting regional and statewide objectives to address the housing crisis we face in California is vitally important. To this end, we strongly support strategies to promote urban infill, support climate smart transportation initiatives, and to leverage nature-based solutions to climate threats, which are solutions that typically provide multiple benefits to communities, such as increased livability, more equitable access to nature, and improved habitat for wildlife, water, and food production. We support continued evaluation of housing needs and further refinement of Plan Bay Area to better meet SB 375 (Steinberg, 2009) goals. **However, we see within the recommended housing allocation methodology, an enormous increase of housing allocations to**

**unincorporated counties, which will inevitably pressure local governments and cities into zoning lands that are inappropriate for housing in order to meet those requirements.**

For example, in unincorporated Santa Clara County alone, the allocation of housing units increased from 277 units in RHNA 5 to 4,137 for RHNA 6, representing a nearly 1,400 percent increase. Other unincorporated counties are projecting similar drastic increases through the proposed methodology:

| <b>Unincorporated County</b> | <b>RHNA 5 Allocation</b> | <b>RHNA 6 Allocation</b> | <b>% Increase</b> |
|------------------------------|--------------------------|--------------------------|-------------------|
| Alameda                      | 1,769                    | 4,530                    | 156%              |
| Contra Costa                 | 1,367                    | 5,827                    | 326%              |
| Marin                        | 185                      | 3,820                    | 1,965%            |
| Napa                         | 180                      | 792                      | 340%              |
| San Mateo                    | 913                      | 2,933                    | 221%              |
| Santa Clara                  | 277                      | 4,137                    | 1,394%            |
| Solano                       | 103                      | 1,016                    | 886%              |
| Sonoma                       | 515                      | 5,257                    | 921%              |

**We are very concerned that such high allocations for unincorporated areas, which are primarily rural, agricultural, or open space, will significantly increase pressure to zone for housing in areas at high risk for fire, over PCAs, on productive agricultural lands, or proximate to critical habitat linkages (Attachment 2).** We also know the proximity of concentrated growth near critical habitat raises a host of issues, like the potential loss of adjacent habitat, habitat fragmentation, and increased use of rodenticides with their collateral effects on predators like mountain lions and bobcats in the vicinity.

**Furthermore, we see these allocations as running counter to objectives stated in state housing element code Section 65584(d)(2)<sup>1</sup>:**

*(2) Promoting infill development and socioeconomic equity, the protection of environmental and agricultural resources, the encouragement of efficient development patterns, and the achievement of the region’s greenhouse gas reductions targets provided by the State Air Resources Board pursuant to Section 65080.*

The goal of Plan Bay Area, per SB 375, is to reduce greenhouse gas emissions by focusing housing near jobs and transit. The allocation of significant increases in housing units to the unincorporated (rural) counties accelerates sprawl, which is exactly counter to the strategic goals Plan Bay Area is trying to achieve. **Housing allocations must be consistent with the intent to stop greenfield development, and instead practice smart growth strategies that apply infill construction within the existing urban footprint of our communities.**

Importantly, with the latest megafires serving as a backdrop, the potential for wildland fire embers to be carried by winds for miles into the built environment is well-documented. Homes in and near the wildland-urban interface (the WUI) are at particular risk if adequate defensible spaces and home hardening measures have not been taken (please see Attachment 3,4). **Increased, concentrated development in the WUI, incentivized by the pressure of high RHNA**

<sup>1</sup> [http://leginfo.legislature.ca.gov/faces/codes\\_displaySection.xhtml?sectionNum=65584.&lawCode=GOV](http://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?sectionNum=65584.&lawCode=GOV)

**allocations to unincorporated areas, does not follow best practices in mitigating the threat of catastrophic wildfire that risks lives and property.** A 2017 insurance analysis shows that almost 350,000 homes in the Bay Area are in areas at high or extreme risk of wildfire already.<sup>2</sup> We must avoid exacerbating this deadly problem by unintentionally spurring development in the WUI.

**For all of the reasons stated, while we support Option 8A and believe it furthers our environmental goals on the whole, we request that the additional housing allocations for unincorporated counties across the region be significantly reduced or eliminated, to maintain consistency with climate goals and strategies with Plan Bay Area and the State of California.**

We appreciate your consideration for these concerns and look forward to speaking with you should you have any questions.

Sincerely,

Ana M. Ruiz  
General Manager  
Midpeninsula Regional Open Space District

Andrea Mackenzie  
General Manager  
Santa Clara Valley Open Space Authority

Annie Burke  
Executive Director  
TOGETHER Bay Area (Attachment 5)

Megan Fluke  
Executive Director  
Green Foothills

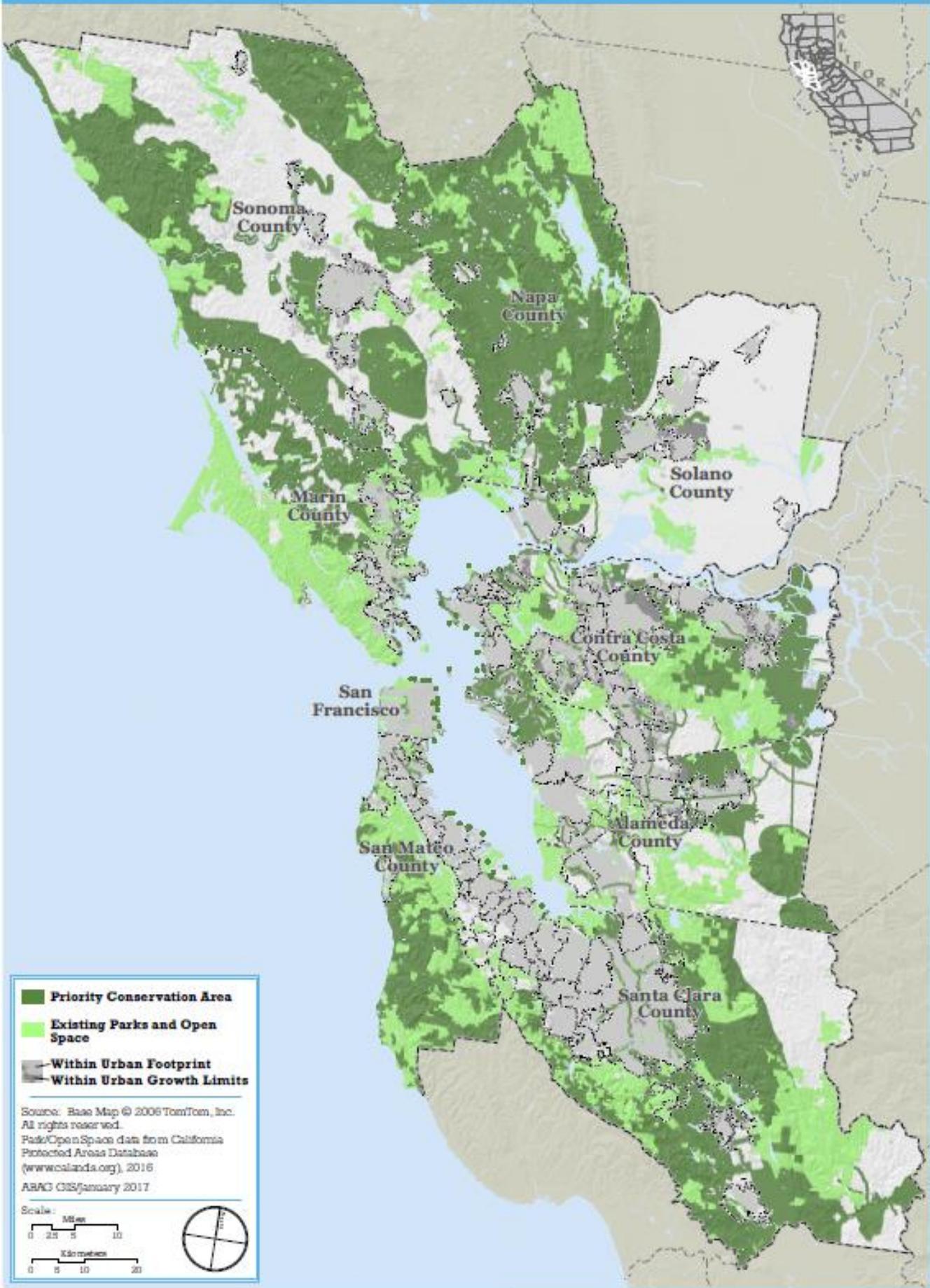
Walter Moore  
President  
Peninsula Open Space Trust

Attachments:

1. Bay Area PCA Map (ABAG)
2. Bay Area Critical Habitat Linkages (MROSD)
3. HCD/TCAC High Opportunity Areas and Wildland-Urban Interface Map (MROSD)
4. Bay Area Fire Hazard Severity Zone Map (CalFire)
5. Member list of TOGETHER Bay Area

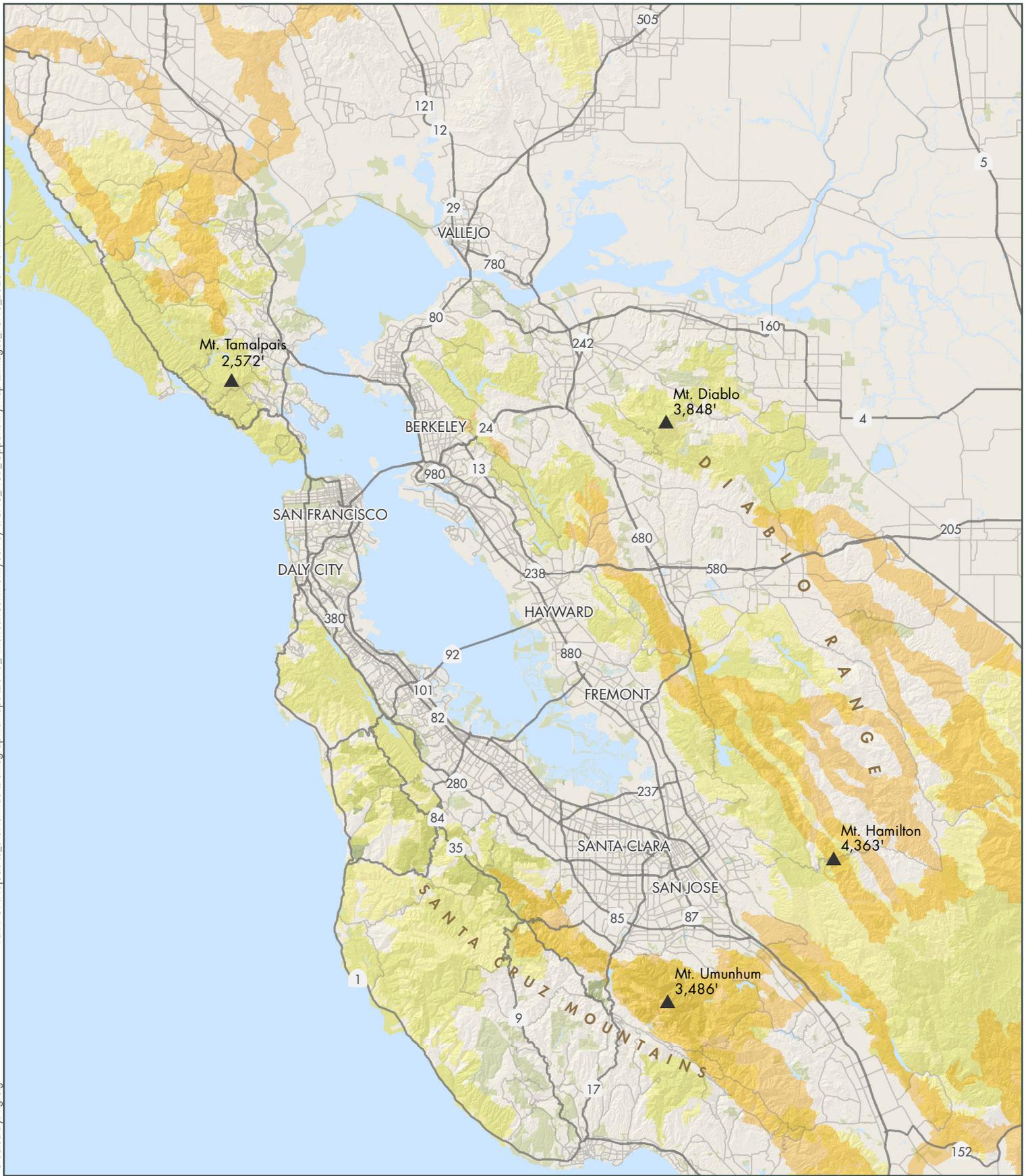
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<sup>2</sup> <https://www.sacbee.com/news/california/fires/article216076320.html>



### Priority Conservation Areas - Potential for Expansion of Parks, Urban Greening, and Protected Open Space





### Bay Area Critical Linkages

- Midpen preserve
- Critical Wildland Linkage
- Other protected land
- Large Wildland Landscape Block
- Private land

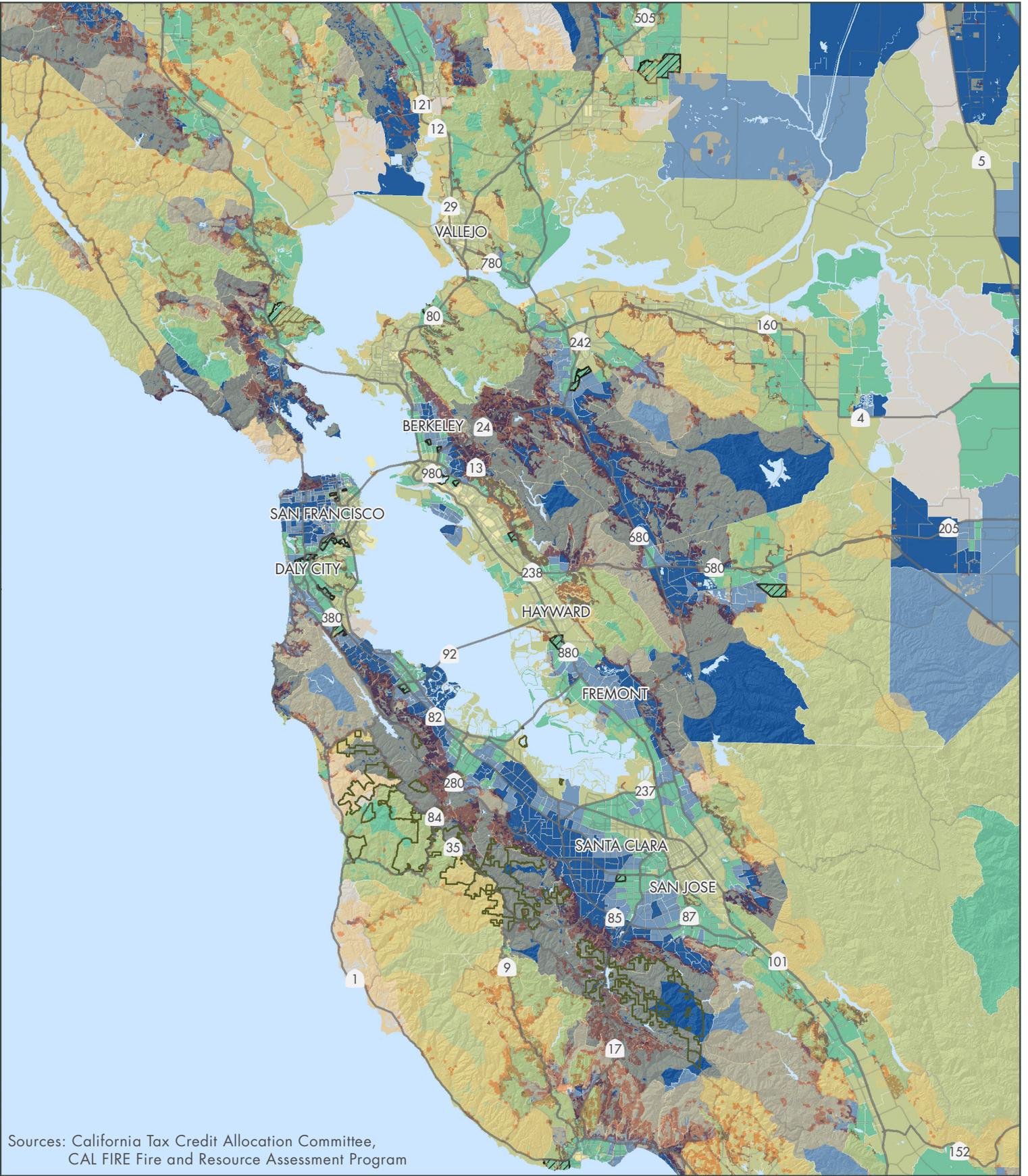
Sources: Science and Collaboration for Connected Wildlands

Midpeninsula Regional  
Open Space District  
(Midpen)



11/9/2020





Sources: California Tax Credit Allocation Committee, CAL FIRE Fire and Resource Assessment Program

### TCAC/HCD Opportunity Areas

|                    |                                                                                                                           |                                                                                                                  |
|--------------------|---------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------|
| <b>Opportunity</b> |  Highest resource                      |  Low resource                 |
|                    |  High resource                         |  High segregation & poverty   |
|                    |  Moderate, resource (rapidly changing) |  Missing or insufficient data |
|                    |  Moderate resource                     |                                                                                                                  |

|                 |                                                                                                      |
|-----------------|------------------------------------------------------------------------------------------------------|
| <b>FRAP WUI</b> |  Midpen preserves |
|                 |  Influence zone   |
|                 |  Intermix         |
|                 |  Interface        |

Midpeninsula Regional  
Open Space District  
(Midpen)

10/12/2020

Miles 



While the District strives to use the best available digital data, these data do not represent a legal survey and are merely a graphic illustration of geographic features.



# TOGETHER BAY AREA

## Founding Members

The following 65 public agencies, Indigenous Tribes, and nonprofits in the 10-county San Francisco Bay Area are Founding Members

[Alameda County Resource Conservation District](#)  
[Amah Mutsun Land Trust](#)  
[Bay Area Ridge Trail Council](#)  
[Brown Girl Surf](#)  
[Bull Valley Agricultural Center](#)  
[California Academy of Sciences](#)  
[California Invasive Plant Council \(Cal-IPC\)](#)  
[California Mountain Biking Coalition](#)  
[City of American Canyon](#)  
[Claremont Canyon Conservancy](#)  
[Coastside Land Trust](#)  
[David R. Brower, Ronald V. Dellums Institute for Sustainable Policy Studies](#)  
[East Bay Municipal Utility District](#)  
[East Bay Regional Park District](#)  
[East Contra Costa County Habitat Conservancy](#)  
[Friends of Five Creeks](#)  
[Golden Gate National Parks Conservancy](#)  
[Golden Hour Restoration Institute](#)  
[Grassroots Ecology](#)  
[Land Trust of Santa Cruz County](#)  
[LandPaths](#)  
[Mare Island Heritage Trust](#)  
[Marin Conservation League](#)  
[Marin Agricultural Land Trust](#)

[Marin County Parks](#)  
[Marin County Bicycle Coalition](#)  
[Marin Municipal Water District](#)  
[Marin Open Space Trust](#)  
[Midpeninsula Regional Open Space District](#)  
[Mountain Bikers of Santa Cruz](#)  
[Muwekma Ohlone Tribe of the San Francisco Bay Area](#)  
[Napa County Regional Park and Open Space District](#)  
[National Park Service – Golden Gate National Recreation Area, Rosie the Riveter/WWII Home Front NHP](#)  
[Oakland Parks and Recreation Foundation](#)  
[Paula Lane Action Network \(PLAN\)](#)  
[Peninsula Open Space Trust](#)  
[Pie Ranch](#)  
[Rails-to-Trails Conservancy](#)  
[River Otter Ecology Project](#)  
[San Francisco Bay Trail](#)  
[San Francisco Public Utilities Commission](#)  
[San Francisco Recreation and Parks Department](#)  
[San Mateo County Parks](#)  
[San Mateo County Parks Foundation](#)  
[San Mateo Resource Conservation District](#)

[Santa Clara County Parks and Recreation Department](#)  
[Santa Clara Valley Open Space Authority](#)  
[Santa Cruz County, Parks, Open Space & Cultural Services](#)  
[Save Mount Diablo](#)  
[Save the Redwoods League](#)  
[Sempervirens Fund](#)  
[Solano Land Trust](#)  
[Sonoma County Ag + Open Space](#)  
[Sonoma County Regional Parks](#)  
[Sonoma Land Trust](#)  
[Sonoma Water](#)  
[Student Conservation Association \(SCA\)](#)  
[Sustainable Agriculture Education \(SAGE\)](#)  
[The California Urban Streams Partnership](#)  
[The Field Semester](#)  
[Tri-Valley Conservancy](#)  
[Urban Bird Foundation](#)  
[Valley Water](#)  
[YES Nature to Neighborhoods](#)  
[Youth Outside](#)

Please note, National Park Service members do not participate in our coalition's advocacy efforts.

[REDACTED]

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**From:** Cheriell Jensen <[REDACTED]>  
**Sent:** Tuesday, November 24, 2020 4:53 PM  
**To:** Regional Housing Need Allocation  
**Subject:** RHRN Numbers for Saratoga

**\*External Email\***

Cheriell Jensen

[REDACTED]  
[REDACTED]

November 24, 2020

[RHNA@bayareametro.gov](mailto:RHNA@bayareametro.gov)

Dear ABAG/MTC/RHNA Department:

The allocation of 2100 dwelling units to Saratoga is made by people who have not done the careful work of planning and siting homes in our city according to our environmental constraints. Fully half of Saratoga consists of steep hills with extreme fire danger, on-going soil creep, landslides, fault zones and faults. It has high rainfall compared to the valley floor. The other half of our land is in what is called the forebay meaning entry to the aquifer. Santa Clara County sits on a deep four level aquifer. This land we must leave open enough to percolate rainfall and recharge our aquifer. Unlike San Francisco and the East Bay which have taken command of substantial Sierra water supplies, we have not. Fifty percent of our Santa Clara County's water supply comes from local sources, basically our aquifer. Unlike the county in general, San Francisco, San Mateo and the East Bay, these agencies who own critical Sierra waters, most of the time 100% of Saratoga's water comes from this local aquifer system. Hence this forebay system is vital to our very life. As a planner by profession for San Jose and for the County of Santa Clara we experienced several multi-year droughts from early 70's, and learned the hard way what a fragile and critically important task is this aquifer recharge system.

We also learned the hard way the lessons of building homes on landslides, expansive soils and faults. A large number of homes were built on Boulder Creek in the San Jose Eastern hills in the 60s. As the hills were differentially weighted and lawns got watered, the land began to collapse. Houses began to collapse. Utilities had to be built above ground so when they failed it was visible and could be fixed right

away. Homes were rebuilt over and over. They continued collapsing about as fast as they were rebuilt. The roads were continually rebuilt by engineers who claimed they could conquer nature. Successive homeowners lost everything. The public paid and paid and paid for this mistake. Simoni Drive was next to fail in a similar manner.

Eventually the geotechnical work by USGS and private geologists, studying both sides of our Santa Clara valley, showed that our hillsides are not bedrock but pretty much unstable sands and expansive clay soils. If landsliding was not visible when development began, it soon would be. In addition, these hillsides are designated extreme high fire danger. Lesson learned, in the City of San Jose and then the County of Santa Clara we drew the urban limit lines at the 15 percent slope to keep development out of these risky areas. Saratoga came slightly later (1980) to lower densities in these highly unstable lands, and through a citizen initiative we lowered the allowable densities but we were already partly developed in these unstable lands. We continue to have major expenses rebuilding roads and legal liabilities for homes on unstable ground, but far less than it would be without our lower densities and restrictions. Contrary to the North Bay and Oakland Hills where development proceeded without the degree of caution warranted, we demonstrated our caution has markedly lowered the risk of massive loss and saved lives.

The flatter lands of Saratoga were designated by the SC Valley Water agency as forebay based on their role in percolating the rainfall into our aquifer. Some other cities in the county also have some forebay lands but Saratoga's gently sloping lands are almost entirely forbay. These forebay lands play a vital role in our restoring our aquifers so they can hold our water. Fifty percent of our county's water comes from this system, but almost 100% of Saratoga's water comes from pumping wells from the aquifer of this system. To accommodate this process, Saratoga has had a hardscape limit on development of 30% per parcel.

This proposal to somehow find land to build 2100 dwelling units would require building over much of the land that recharges the aquifer. Densifying development ignores this vital water process without handing us any water alternative. It was made by legislative fiat and ABAG/MTC without their examining the mapped hazards and resource maps and without understanding that our landscape is not just resource but also our critical support system.

Most important, it ignores the fact that our lands are now 99.95% developed in a pattern difficult to change and has been developed in that pattern with few exceptions for 40 years. In fact, this development has been in place, with few new developed lots since 1980 because our lands were already mostly built out by then. Saratoga population in 1980 was 29,261 and in 2020 was 30,311 (US Census).

Saratoga does not invite jobs. We have no industrial land to create jobs. We have almost no commercial land. We now have a single grocery store and hardware store for 30,311 people. Saratoga citizens have been the most responsible citizens anywhere with a very low birth rate, way below replacement. (Only 21% of our population was below the age of 18 in 2019, fewer than half the children in 1980 (then 44.2 percent below the age of 19).)

Saratoga does not create a local or regional housing demand. Saratoga population in 1980 was 4.6% Asian and in 2020 is 49.1 % Asian (US Census). Of our current population 30 % speak other than English. What this means is that the housing we have, has created housing for people coming from other countries to live here. Our housing now is not supporting either a general local need arising from our low birth rate, and even the even lower local Asian birth rate. Our housing as it is sold is primarily serving people from other counties driving up the prices so our own children and grandchildren must locate their lives elsewhere. This is an unsustainable demand and one that would put a broken strain on our resources. A third of the people of the world would probably like to live here. We love them and would welcome them all, but haven't the resources to serve such a demand.

We are being forced by others to destroy our water system and build on hazardous lands because others are not accountable for the demand they created? Now the whole of California has failed to control the housing demand they carelessly created without a thought of where all that water would be coming from, and where there is land available for building the housing for all those jobs?

The High-Rise Solution? Much of San Francisco has bedrock to support high rise buildings. But, in those areas of damp soils, liquefaction failure in even moderate earthquakes has been severe and failure even without earthquake activity is occurring in San Francisco due to not requiring high rises be actually supported on bedrock. Santa Clara County and Saratoga in particular have no bedrock. Saratoga has ridden out earthquakes fairly well as we had a low profile and have avoided developing on Faults. As we grow upwards the entire county will be extra susceptible to serious fault movement from the San Andreas extensive fault system and the Hayward/Calaveras fault systems. We know we sit beside and in places on those fault systems, but have chosen to locate much of the most vibrant parts of the U.S. economy right on these iffy liquefaction soils. This is a monumental mistake. As this industry builds higher it becomes more susceptible to earthquake losses.

We are being treated as if we have not done our homework. We have - extensively. Our decisions stem from years of effort to live within the limits of our resources, carefully avoid hazards, and welcome the people of the world, at the same time seeing that economic pressure from that welcome-matt send our children and grandchildren elsewhere to live. We cannot grow the way ABAG/MTC demands. We just don't have the land. MTC is not solving any transportation decisions that affect us, and should be disbanded. ABAG does nothing to help or improve our lives. And we do not see why we should try to do the impossible things ABAG/MTC have demanded. It solves nothing, just makes life more complicated and difficult We are told we live in a Democracy but this is not true. We have no voice in these ridiculous impossible decisions.

We cannot do what you have demanded of us.

Yours truly,

Cheriel Jensen

**From:** Susan Kirsch <[REDACTED]>  
**Sent:** Wednesday, November 25, 2020 9:03 AM  
**To:** Regional Housing Need Allocation  
**Subject:** Reject RHNA Methodology

**\*External Email\***

November 25, 2020

Mayor Jesse Arreguin, President  
ABAG Executive Board  
c/o ABAG & MTC Public Information Office  
[RHNA@bayareametro.gov](mailto:RHNA@bayareametro.gov)

Dear President Arreguin and ABAG Executive Board Members:

**Summary:** Reject the proposed RHNA Methodology until the accuracy of the housing numbers is confirmed, the assumptions are aligned with the reality of state (not national) trends in a post-COVID world; and the legality of the decision is determined.

1. California's housing need isn't as great as the state claims. It is irresponsible to approve the Methodology until the approach to determine the numbers is proven reliable.

The Embarcadero Institute's report "["Double Counting in the Latest Housing Needs Assessment"](#)" (September 2020) finds, "Use of an incorrect vacancy rate and double counting, inspired by SB-828, caused the state's Department of Housing and Community Development to exaggerate by more than 900,000 the units needed in SoCal, the Bay Area and the Sacramento area."

"The state's approach to determining the housing need must be defensible and reproducible if cities are to be held accountable. Inaccuracies on this scale mark the fact that cities and counties are surpassing the state's market-rate housing targets but falling far short in meeting affordable housing targets."

2. The assumptions of the RHNA Methodology are unreliable. It is irresponsible to approve the Methodology until the assumptions are aligned with the reality of COVID-19, remote work, changing transportation patterns, an exodus from California, and deepening economic upheaval.

3. RHNA Methodology that usurps local authority endowed to elected City Councils or Boards of Supervisors will not go unchallenged. Nor will community leaders, homeowners, and renters stand by as HCD foists irrational, wildly inflated housing quotas on communities. [CalMatters columnist Dan Walters](#), reporting about the Embarcadero Institute report writes, "resistance has developed among affected local governments and officials are mulling whether to challenge them in court."

**THERE IS A BETTER WAY!** Reject the unreliable RHNA Allocation Methodology. Take time to collaborate with locally elected officials and community leaders to get it right. With accuracy and collaboration, housing needs can be solved.

Sincerely,

***Susan Kirsch, Political Advisor  
Chair, Nix-the-Nine Campaign***



**From:** Lou Ann Bassan <[REDACTED]>  
**Sent:** Wednesday, November 25, 2020 9:31 AM  
**To:** Regional Housing Need Allocation  
**Subject:** REJECT proposed RHNA Methodology

**\*External Email\***

November 25, 2020

Mayor Jesse Arreguin, President  
ABAG Executive Board  
c/o ABAG & MTC Public Information Office  
[RHNA@bayareametro.gov](mailto:RHNA@bayareametro.gov)

Dear President Arreguin and ABAG Executive Board Members:

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"The state's approach to determining the housing need must be defensible and reproducible if cities are to be held accountable. Inaccuracies on this scale mark the fact that cities and counties are surpassing the state's market-rate housing targets but falling far short in meeting affordable housing targets."

2. The assumptions of the RHNA Methodology are unreliable. It is irresponsible to approve the Methodology until the assumptions are aligned with the reality of COVID-19, remote work, changing transportation patterns, an exodus from California, and deepening economic upheaval.

3. RHNA Methodology that usurps local authority endowed to elected City Councils or Boards of Supervisors will not go unchallenged. Nor will community leaders, homeowners, and renters stand by as HCD foists irrational, wildly inflated housing quotas on communities. [CalMatters columnist Dan Walters](#), reporting about the Embarcadero Institute report writes, "resistance has developed among affected local governments and officials are mulling whether to challenge them in court."

**THERE IS A BETTER WAY!** Reject the unreliable RHNA Allocation Methodology. Take time to collaborate with locally elected officials and community leaders to get it right. With accuracy and collaboration, housing needs can be solved.

Sincerely,

***Lou Ann Bassan***



**From:** Pat Marriot <[REDACTED]>  
**Sent:** Wednesday, November 25, 2020 11:48 AM  
**To:** Regional Housing Need Allocation  
**Subject:** Please reject RHNA methodology

**\*External Email\***

Dear President Arreguin and ABAG Executive Board Members:

I urge you to reject the proposed RHNA Methodology until the accuracy of the housing numbers is confirmed, the assumptions are aligned with the reality of state (not national) trends in a post-COVID world, and the legality of the decision is determined.

1. Our housing need isn't as great as the state claims. We need numbers that are proven to be reliable before approving the Methodology.

Please refer to the Embarcadero Institute's report ["Double Counting in the Latest Housing Needs Assessment"](#) which says: *"Use of an incorrect vacancy rate and double counting, inspired by SB-828, caused the state's Department of Housing and Community Development to exaggerate by more than 900,000 the units needed in SoCal, the Bay Area and the Sacramento area.*

*"The state's approach to determining the housing need must be defensible and reproducible if cities are to be held accountable. Inaccuracies on this scale mark the fact that cities and counties are surpassing the state's market-rate housing targets but falling far short in meeting affordable housing targets."*

2. Methodology assumptions are unreliable. Methodology should not be approved they take into account the reality of COVID-19, working from home, changing transportation patterns, the exodus from California, and economic upheaval.

3. Methodology that takes away local authority of elected city councils will not go unchallenged. Community leaders, homeowners, and renters will not stand by as the HCD pushes wildly inflated housing quotas on them. [CalMatters columnist Dan Walters](#), reporting on the Embarcadero Institute report writes, *"resistance has developed among affected local governments and officials are mulling whether to challenge them in court."*

Please reject the unreliable RHNA Allocation Methodology. Take time to collaborate with locally-elected officials and community leaders and do the right thing.

Thank you,  
(Ms.) Pat Marriott [REDACTED]

**From:** zrants <[REDACTED]>  
**Sent:** Wednesday, November 25, 2020 1:03 PM  
**To:** Regional Housing Need Allocation  
**Subject:** We support the Nix the Nine request that you dismiss the RHNA numbers

**\*External Email\***

November 25, 2020

Mayor Jesse Arreguin, President  
ABAG Executive Board  
c/o ABAG & MTC Public Information Office  
[RHNA@bayareametro.gov](mailto:RHNA@bayareametro.gov)

Dear President Arreguin and ABAG Executive Board Members:

**Summary:** Reject the proposed RHNA Methodology until the accuracy of the housing numbers is confirmed, the assumptions are aligned with the reality of state (not national) trends in a post-COVID world; and the legality of the decision is determined.

As an individual and neighborhood representative in San Francisco, I support the Nix the Nine request that you dismiss the RHNA numbers. We feel they are based on false assumptions and misrepresent the current housing needs of our communities. Count our neighbors among those who reject the RHNA numbers.

Sincerely,

Mari Eliza,

Concerned San Francisco Citizen and on behalf of Mission Street Neighbors.

November 24, 2020

Mayor Jesse Arreguin, President  
Executive Board, Association of Bay Area Governments  
375 Beale Street, Suite 700  
San Francisco, CA 94105

RE: Proposed RHNA Methodology and Subregional Shares - Support for **Option 8A** using the Plan Bay Area 2050 **Households** Baseline with the **Equity Adjustment**

Dear President Arreguin and ABAG Executive Board,

We are a diverse set of organizations and stakeholders, including the 6 Wins for Social Equity Network and close partners, from across the region focusing on housing, the environment, and the economy. **We strongly support ABAG's proposed RHNA methodology, known as the "High Opportunity Areas Emphasis & Job Proximity" methodology ("Option 8A") using the Plan Bay Area 2050 Households baseline, but believe the methodology needs to be further refined through a small but meaningful adjustment to more fully meet the statutory objective for affirmatively furthering fair housing.**

With the adjustment, this methodology will move us closer to an inclusive and prosperous region where all residents have a safe and affordable home and equal access to environmental, economic, and educational opportunity.

Option 8A represents a sound compromise born of an in-depth, iterative process at the ABAG Housing Methodology Committee. Over the last year, this diverse group of local elected officials, city and county staff, and community stakeholders engaged in robust discussion on every aspect of the methodology. ABAG adopted the Committee's recommendation due to its strong performance on the statutory objectives of RHNA. A majority of the Committee also supported an equity adjustment. We urge you to continue to respect the integrity of this process and move forward with the Committee's recommendation, with the equity adjustment.

**As ABAG staff has demonstrated through a set of performance metrics, Option 8A performs well on all five of RHNA's statutory objectives.** This methodology will help our region improve our environment, reduce our commutes, and ensure every resident has a stable home they can afford:

1. Improve our Environment: Option 8A will help improve our environmental health and mitigate climate change in several ways:
  - a. The “Access to High Opportunity Areas” factor allocates more homes in jurisdictions with high quality economic, educational, and *environmental* opportunity.<sup>1</sup> This means that more homes, especially affordable homes, will be allocated to jurisdictions with quality jobs, adequately-resourced schools, and minimal pollution.
  - b. The 70 percent weight to the “Access to High Opportunity Areas” factor for affordable homes will require jurisdictions that have mostly zoned for single-family homes to now zone for multi-family housing to meet the very low- and low-income allocations.<sup>2</sup> Multi-family buildings, such as apartments, are more efficient uses of our space and they use less energy, water, and land than single-family neighborhoods.<sup>3</sup>
  - c. The Plan Bay Area 2050 Households baseline and job proximity factors allocate more homes near projected job growth, thereby reducing commutes and greenhouse gas emissions. Option 8A with an Equity Adjustment allocates 60 percent of the total RHNA to the counties with highest projected job growth: San Francisco, San Mateo County, and Santa Clara County.
  
2. Reduce our Commutes: Option 8A will reduce commutes for *all kinds of jobs*, not just the tech jobs in Silicon Valley, in order to meet the new statutory jobs-housing fit requirement. Jobs-housing fit is a jurisdiction’s ratio of low-wage jobs to homes affordable to those workers.<sup>4</sup> Those workers include farmworkers, service workers at our tourist destinations, homes, offices, and schools, and many others. Currently, many of our jurisdictions have a severely imbalanced jobs-housing fit. For example, Pleasanton’s jobs-housing fit is 19 (meaning there are 19 low-wage jobs for every home affordable to those workers), Danville’s is 11, and Sonoma’s is 8. Each day, over 170,000 people commute into Contra Costa County for work and about one-third of those commuters are traveling more than 50 miles to those jobs, which means we need homes in Contra Costa County too.<sup>5</sup> Thus, Option 8A and the Equity Adjustment will help reduce commutes for everyone.

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<sup>1</sup> California Tax Credit Allocation Committee’s [Opportunity Mapping Methodology 2020](#); Environmental opportunity is based on [CalEnviro Screen 3.0](#), which measures the level of environmental health in each census tract, including the extent of air and water pollution.

<sup>2</sup> Cal. Gov. Code Section [65583.2\(c\)\(3\)\(B\)](#).

<sup>3</sup> “[Apartments in buildings with 5 or more units use less energy than other home types](#),” U.S. Energy Information Administration (June 2013).

<sup>4</sup> “[Low-wage Jobs-housing Fit: Identifying Locations of Affordable Housing Shortages](#),” UC Davis (Feb. 2016).

<sup>5</sup> U.S. Census Bureau, Center for Economic Studies at <https://onthemap.ces.census.gov/>.

3. Stable Homes for all Bay Area Residents: Residents across the Bay Area have a wide range of income levels but those on the lower end have few options affordable to them. Option 8A helps ensure that there will be new homes affordable in every part of the region. However, an Equity Adjustment, as described below, is necessary to fully meet this need.

**An Equity Adjustment is necessary to improve this methodology’s performance on the affirmatively furthering fair housing objective.** At the Housing Methodology Committee’s final meeting on September 18, more than half of the committee supported an adjustment to ensure that each exclusive jurisdiction receives a share of the region’s very low and low-income allocations that is at least proportional to the jurisdiction’s share of the region’s total number of households.<sup>6</sup> Many members of the ABAG Executive Board also stated on October 15 that meeting the statutory objectives of RHNA and advancing racial equity were critical and worthy of potential improvements to the methodology.

The Equity Adjustment will operate as follows: if a racially and/or economically exclusive jurisdiction receives a share of the region’s very low- and low-income allocations that is less than proportional to the jurisdiction’s share of the region’s households, the Equity Adjustment will add very low- and low-income units to its allocations until the jurisdiction’s share of the region’s very low- and low-income allocations is proportional to its share of the region’s households. For example, if jurisdiction A is racially and/or economically exclusive and is home to 1% of the region’s households but receives 0.8% of the region’s very low- and low-income allocations, then the adjustment will add at least 0.2% of the region’s very low- and low-income allocations to jurisdiction A.

Under the proposed methodology, without an adjustment, there are 17 exclusive jurisdictions that are *not* receiving this proportional share of very low- and low-income allocations.<sup>7</sup> Using an adjustment to re-allocate just 3,003 more affordable homes (which make up 1.7% of the total lower-income RHNA and 0.7% of the total RHNA) to these jurisdictions will ensure that this proportional threshold is met throughout the region. These allocations are essential to encourage more multi-family zoning, which will further both our need to build more affordably in areas of opportunity and build more efficiently and densely. Otherwise, the RHNA will exacerbate fair housing problems in over one-third of our historically exclusive jurisdictions which would be the opposite of affirmatively furthering fair housing.

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<sup>6</sup> Housing Methodology Committee [Meeting on Sept 18, 2020](#) at 1:06:00-1:06:47 (only 9 out of 31 members voted against the equity adjustment).

<sup>7</sup> Four out of those 17 jurisdictions are in Napa and Sonoma Counties where fire risk is increasing. Consistent with the duty to affirmatively further fair housing, ABAG should work with HCD and those 4 jurisdictions to discuss how these risks can be mitigated in their housing elements.

To apply the Equity Adjustment, the additional allocations must come from other jurisdictions. The following are a few different ways to perform this reallocation:

1. **Unincorporated jurisdictions:** The Equity Adjustment could take allocations from some unincorporated jurisdictions that may lack sewage and utility lines or have substantial protected open space. If ABAG chooses this option, it must carefully consider which unincorporated areas from which to reduce allocations, because there are many high-income, urbanized communities in unincorporated areas as well. For example, Alamo is an unincorporated community in Contra Costa County where the jobs-housing fit is 10, the median home value is \$1.6 million, and it is a high opportunity area.<sup>8</sup> Thus, this reallocation must still affirmatively further fair housing by ensuring that the unincorporated areas with high-income, urbanized communities are allocated their fair share of affordable units.
2. **Non-exclusive jurisdictions:** as staff had recommended to the Housing Methodology Committee on September 18, another option is to reduce allocations from all jurisdictions that are *not* “racially and economically exclusive” (as defined by the AFFH performance metric) in proportion to their initial share of the region’s lower-income RHNA.
3. **Least exclusive jurisdictions:** another option is to reduce allocations from the jurisdictions that have the *lowest* extent of racial and economic exclusion (as defined by the AFFH performance metric).

Moreover, **we strongly urge ABAG to reject alternatives, such as changing the baseline, that perform worse on the statutory objectives’ performance metrics.** Alternative proposals that use Plan Bay Area 2050 Growth as the baseline, for example, fail to meet the statutory objective to affirmatively further fair housing and perform worse than the current ABAG proposed methodology on almost all other metrics. If any further adjustments to the methodology are made, they should instead perform holistically better on the metrics and objectives.

**Finally, we recognize that there are many essential objectives of the RHNA process that must be advanced through local housing element updates, including equitable planning that accounts for geographies particularly vulnerable to fire and flood, protecting our open space, and dismantling segregation within local jurisdictions.** These are essential goals that local jurisdictions must address in their housing elements after they receive their RHNA allocations. State law allows local jurisdictions to plan how to meet their RHNA in ways that are most appropriate for their local context. For instance, they should avoid using sites with

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<sup>8</sup> UC Davis Jobs-Housing Fit [data](#) (2016); [Alamo Census Estimates](#) (2019); California Tax Credit Allocation Committee’s [Opportunity Map](#) (2020).

insufficient water, sewage, and dry utilities,<sup>9</sup> they should avoid planning for very low and low income homes in the neighborhoods facing moderate and high wildland fire hazards, and they should plan for more affordable homes in the neighborhoods with higher access to opportunity. We look forward to continuing to work with our elected leaders and agency staff across the region to ensure these goals are met.

Now is the time for all Bay Area cities and counties to come together and move collectively toward a more equitable, sustainable, inclusive future where people of all racial and economic backgrounds have access to housing and resources. ABAG's proposed methodology with the Equity Adjustment outlined above will help us get there.

Signed,

Shajuti Hossain, *Public Advocates*

Debra Ballinger, *Monument Impact (in Concord)*

Tim Frank, *Center for Sustainable Communities*

Louise Auerhahn, *Working Partnerships USA (in San Jose)*

Justine Marcus, *Enterprise Community Partners*

Leslie Gordon and Tameeka Bennett, *Urban Habitat*

Rodney Nickens Jr., *Non-Profit Housing Association of Northern California* [HMC member]

Jeffrey Levin, *East Bay Housing Organizations* [HMC member]

Darnell Grisby and Hayley Currier, *TransForm*

Mike Rawson, *Public Interest Law Project*

Matt King, *Sacred Heart Community Service (in San Jose)*

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<sup>9</sup> Cal. Gov. Code Section [65583.2](#)(b)(5)(B).

Laura Hall, *EAH Housing*

Héctor Malvido, *Ensuring Opportunity Campaign to End Poverty in Contra Costa County*

Ian Winters, *Northern California Community Land Trust*

Gina D. Dalma, *Silicon Valley Community Foundation*

Cindy Wu, *Bay Area Local Initiatives Support Corporation*

Leslye Corsiglia, *Silicon Valley at Home*

Adam Briones, *The Greenlining Institute*

Ruby Bolaria Shifrin, *Chan Zuckerberg Initiative* [HMC member]

Judith Bell, *The San Francisco Foundation*

Karen Chapple, *Professor of City & Regional Planning at UC Berkeley*

Jason Tarricone, *Community Legal Services of East Palo Alto*

Jennifer Ganata, *Communities for a Better Environment*

Nadia Aziz, *Law Foundation of Silicon Valley*

Belén Lopez-Grady and Sarah Casmith, *North Bay Organizing Project*

Aaron Eckhouse, *California YIMBY*

*East Bay for Everyone*

David Watson, *Mountain View YIMBY*

*South Bay YIMBY*

Kelsey Banes, *Peninsula for Everyone*

Laura Foote, *YIMBY Action*

Sylvia Chi, *Asian Pacific Environmental Network*

Todd David, *Bay Area Housing Advocacy Coalition*

Zarina Kiziloglu, *Pleasanton Housing Commissioner*