



# Public Comments on Proposed RHNA Methodology

ABAG Executive Board  
December 17, 2020

# Approval of Proposed RHNA Methodology

- Housing Methodology Committee worked collaboratively from October 2019 to September 2020 to recommend a proposed methodology for allocating units throughout the Bay Area in an equitable manner
- **September 18:** HMC voted to recommend *Option 8A: High Opportunity Areas Emphasis & Job Proximity* with the 2050 Households baseline allocation as Proposed RHNA Methodology
- **October 1:** ABAG Regional Planning Committee voted to recommend Proposed RHNA Methodology for approval by ABAG Executive Board
- **October 15:** Executive Board approved Proposed RHNA Methodology and released for public comment
- **October 24 - November 27:** public comment period, including public hearing November 12

# Today's presentation

- Summary of written comments received during the public comment period about the Proposed RHNA Methodology, as well as oral comments from November 12 public hearing
- Public comment period also completed for Draft Subregional Shares - **no comment letters received**

# Public comment: number of letters received by respondent type

- During the public comment period, ABAG received **106 written comments** that provided perspectives from over 200 local government staff and elected officials, advocacy organizations, and members of the public, as some letters represented multiple signatories
- November 12 public hearing included **29 oral comments** from local government representatives, advocacy organizations, and members of the public

Type of Respondent	Number of Letters Received	Number of Oral Comments from Public Hearing
Public Agency - Alameda	5	0
Public Agency - Contra Costa	3	0
Public Agency - Marin	11	1
Public Agency - Napa	2	0
Public Agency - San Francisco	0	0
Public Agency - San Mateo	11	2
Public Agency - Santa Clara	8	2
Public Agency - Solano	1	0
Public Agency - Sonoma	1	0
Advocacy Organizations	9	8
Members of the Public	57	17

# Public comment: common themes

## Comment #1:

Jurisdiction is built out and/or lacks infrastructure to accommodate its allocation

## Preliminary ABAG Response:

- RHNA is required to increase housing supply and mix of housing types for all jurisdictions.
- Local information about plans, zoning, physical characteristics, etc. used as input into Plan Bay Area 2050 Blueprint, which is the baseline allocation in the Proposed RHNA Methodology.
- The Blueprint includes strategies to allow additional feasible growth within the urban footprint.
- By law, ABAG cannot limit RHNA based on existing zoning or land use restrictions, and must consider the potential for increased residential development under alternative zoning ordinances and land use restrictions.

# Public comment: common themes

## Comment #2:

The RHNA methodology should focus more on transit and jobs to better align with Plan Bay Area 2050 and the statutory RHNA objective to promote infill development and achieve greenhouse gas emissions reduction targets

## Preliminary ABAG Response:

- Plan Bay Area 2050 Blueprint is the baseline allocation in the Proposed RHNA Methodology.
- Blueprint emphasizes growth near job centers and near transit, resulting in improved jobs-housing balance and shorter commutes.
- Proposed RHNA Methodology adds factors that allocate nearly half of units based on job proximity (by both automobile and transit).
- Analysis shows Proposed RHNA Methodology performs well on all five RHNA statutory objectives (including greenhouse gas emissions reduction) and is consistent with Plan Bay Area 2050.
- Performance metrics show Proposed RHNA Methodology leads to higher growth rates in jurisdictions with most access to jobs and transit and those with lowest vehicle miles traveled per resident.

# Public comment: common themes

## Comment #3:

The RHNA methodology needs to directly incorporate hazard risk, Blueprint needs to better incorporate hazard data

## Preliminary ABAG Response:

- Including the Blueprint in the RHNA methodology addresses concerns about natural hazards, as the Blueprint excludes areas with unmitigated high hazard risk from Growth Geographies.
- The Blueprint strategies focus future growth away from the highest fire risk zones, support increased wildland management programs, and support residential building upgrades that reduce the likelihood for damage when fires occur in the wildland urban interface.
- The Blueprint strategies address the impacts of sea level rise. However, research does not provide guidance on how to model impacts of temporary riverine flooding.
- Communities can choose to take hazard risks into consideration with where and how they site future development.

# Public comment: common themes

## Comment #4:

Support for Proposed RHNA Methodology, particularly its importance for furthering regional equity

## Preliminary ABAG Response:

- Staff's analysis aligns with these comments and indicates the Proposed RHNA Methodology successfully furthers all five of the statutory objectives of RHNA, including requirements related to affirmatively furthering fair housing.



# Public comment: common themes

## Comment #5:

**Need to account for impacts from COVID-19, by delaying RHNA or reconsidering focus on proximity to jobs**

## Preliminary ABAG Response:

- Staff appreciates concerns about significant economic and societal impacts from COVID-19, and these concerns were relayed to the State in early summer.
- By law, ABAG must move forward with RHNA so jurisdictions can complete updates to their Housing Elements on time.
- Additionally, the 8-year RHNA cycle (which starts in 2023) represents a more long-term outlook than near-term impacts in 2020 and 2021.
- The potential impacts of the trend toward telecommuting in the longer term are incorporated into the Proposed RHNA Methodology through the Plan Bay Area 2050 Blueprint, which includes strategies to expand commute trip reduction programs through telecommuting and other sustainable modes.

# Public comment: common themes

## Comment #6:

### Concerns about allocation to unincorporated areas

#### Preliminary ABAG Response:

- Plan Bay Area 2050 Blueprint forecasts very little growth in unincorporated county areas, and it is focused inside urban growth boundaries.
- RHNA allocations to these areas are driven largely by the number of existing households in unincorporated county areas.
- ABAG-MTC staff has engaged in dialogue with local government staff in Santa Clara, Solano and Sonoma counties to explore potential ways to address these concerns.
- Housing Element Law also includes provisions that allow a county to transfer some of its RHNA allocation to a city later in the RHNA process.

# Public comment: common themes

## Comment #7:

Support for adding the “equity adjustment” proposed by some HMC members to the methodology

## Preliminary ABAG Response:

- Staff’s analysis indicates the proposed methodology currently achieves the statutory objective to affirmatively further fair housing.
- Proposed equity adjustment substantially increases the complexity of the methodology for minimal impact, shifting less than 2% of lower-income units.
- HMC chose not to move forward with the proposed equity adjustment in its recommended methodology.

# Public comment: common themes

## Comment #8:

Concern that HCD's RHND calculation was inaccurate and too high

## Preliminary ABAG Response:

- The procedures for calculating the RHND are clearly specified in state law and the grounds for an appeal were narrowly designed by the Legislature.
- ABAG staff have reviewed HCD's calculation methodology and believe it adheres to applicable legal requirements. The ABAG Executive Board ultimately decided not to appeal the RHND in June 2020.
- The window of appeal of the RHND is now closed. Further feedback on this element of the process is most appropriately provided to HCD, rather than ABAG.

# Public comment: common themes

## Comment #9:

### Jurisdiction-specific issues with Plan Bay Area 2050 Blueprint

#### Preliminary ABAG Response:

- Local jurisdiction staff had multiple opportunities to comment on the BASIS data used as the input for the Blueprint. ABAG-MTC staff has worked directly with local jurisdiction staff to address concerns.

# Next steps

- Staff will consider comments and recommend necessary adjustments for integration into Draft RHNA Methodology
- Draft RHNA Methodology scheduled for release in the next week
- **January 14, 2021:** ABAG Regional Planning Committee weighs in on Draft Methodology
- **January 21, 2021:** ABAG Executive Board slated to take action on Draft RHNA Methodology
- After a Draft RHNA Methodology adopted, ABAG will submit it to HCD for review
- Following in 2021: final methodology and draft allocations (spring), appeals process (summer), final RHNA allocation (late 2021)

# Thank You

For more information, contact:

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[abag.ca.gov/our-work/rhna-regional-housing-needs-allocation](http://abag.ca.gov/our-work/rhna-regional-housing-needs-allocation)