Fred Castro

From:	Aaron Eckhouse <aaron@cayimby.org>
Sent:	Thursday, August 27, 2020 12:07 PM
To:	MTC-ABAG Info
Subject:	ABAG Housing Methodology Committee
Attachments:	YIMBY RHNA Letter.pdf

Ahead of tomorrow's Housing Methodology Committee meeting, I would like to resubmit this letter from a coalition of YIMBY & other pro-housing groups.

We support prioritizing Access to Opportunity & Jobs Proximity in the methodology. These factors will help ensure that new housing is built where it is most needed & where its residents can benefit most from it through shorter commutes & improved access to social resources.

thank you for your work to address the Bay Area's housing needs,

Aaron Eckhouse
Bay Area Regional Organizer, California YIMBY
515-418-8175
he/him/his

May 12, 2020

Chairman Arreguin and esteemed members of the Housing Methodology Committee,

The 6th Cycle Regional Housing Needs Allocation (RHNA) process is a tremendous opportunity to address the pressing social, economic, and ecological need for more homes of all kinds in the Bay Area. It provides a chance to undo historic patterns of segregation and exclusion, expand access to economic opportunity, and establish more sustainable development patterns that will help the Bay Area be a global climate leader. To that end, we offer the following suggestions to the Housing Methodology Committee on how to best allocate the Bay Area's housing need across jurisdictions.

Locating new housing in and near high opportunity areas should be a top factor in considering the share of total housing need allocated to each jurisdiction. Using fair housing metrics for total housing need will most effectively advance the mandate to affirmatively further fair housing and promote the greatest expansion of housing opportunities in resource-rich communities, many of

which have an unfortunate legacy of exclusion that must be overcome. Promoting greater housing opportunities in these neighborhoods is a proven way to help advance regional priorities such as economic mobility, as well as being the metric most clearly consistent with the statutory requirement to affirmatively further fair housing. It is crucial for this metric to be used throughout the allocation process, rather than only to allocate the low-income share of housing need, to ensure that more housing of all types is built where it is needed most. In this way, allocation based on access to high opportunity areas can also advance the statutory requirement to increase housing supply & mix of housing type across all jurisdictions in an equitable manner.

Proximity to jobs should be the other highest-weighted metric in allocation, advancing both the statutory requirement to promote improved regional jobs-housing balance and the requirement to promote infill development and efficient development patterns. It is critical to our climate goals that we give people more opportunities to live closer to work, shortening commutes and making it easier for them to choose non-car modes of transportation. Jobs proximity is a preferred metric because it recognizes that people care less about jurisdictional lines than they do about the chance for a shorter, more convenient commute. This metric, combined with the high opportunity metric, will have the added benefit of allocating the most new housing to the areas in which high demand makes those homes most likely to actually be built.

The "natural hazard" metric does not appear to be effective, as currently constituted, at avoiding development in high risk areas. In fact, it would have the effect of shifting more growth toward areas in the North Bay, such as Windsor and unincorporated Santa Rosa County, that have seen some of the most prominent and destructive natural disasters of recent years. There are very few if any Bay Area cities that truly lack enough safely buildable land to accommodate their share of the housing growth we need as a region. The best way to protect against natural hazards such as fire is to promote compact infill growth in the Bay Area's jobs-rich core.

In addition to weighting factors, we also need a robust evaluative framework for analyzing the eventual allocation methodology. This framework should include consideration of how well the allocation affirmatively furthers fair housing and supports a reversal of historic patterns of segregation and exclusion; how well the proposed housing growth pattern supports a reduction of greenhouse gas emissions and vehicle miles traveled in both commutes and non-work trips; opportunities for transit oriented development along both current and potential future quality transit corridors; and whether the proposed allocation is consistent with patterns of housing demand that shape where new homes are most likely to actually be built.

At the core of the Bay Area's housing crisis is a failure by cities across the region to permit adequate housing for its residents at all levels of affordability. Previous RHNA cycles have unfortunately contributed to this failure, through inadequate overall goals and an inequitable distribution of new homes that concentrated most housing in a few locations. In recent years, the state responded to these shortcomings by passing several laws to reform the RHNA process. The current RHNA cycle is an opportunity to correct those inequities and ensure that

all Bay Area cities permit abundant and affordable housing near jobs, transit, and other key community resources. We hope our suggestions will help the Housing Methodology Committee make the most of it.

With thanks to the Committee for their consideration,

Aaron Eckhouse
Regional Organizing Director
California YIMBY

Todd David
Executive Director
Bay Area Housing Advocacy Coalition

The 1500 Members of
East Bay for Everyone

Kelsey Banes
Peninsula for Everyone

Leslye Corsiglia
Executive Director
Silicon Valley at Home

Dustin Harber
South Bay YIMBY

Urban Environmentalists

Laura Foote
Executive Director
YIMBY Action

Sonja Trauss
President
YIMBY Law

Fred Castro

From:	Gillian Adams
Sent:	Wednesday, August 26, 2020 11:22 AM
To:	Fred Castro
Subject:	FW: RHNA Evaluation Criteria
Attachments:	Letter re RHNA Evaluation Criteria.pdf

FYI.

From: Jeffrey Levin <jeff@ebho.org>
Sent: Wednesday, August 26, 2020 11:18 AM
To: Daniel Saver <dsaver@bayareametro.gov>; Dave Vautin <DVautin@bayareametro.gov>; Eli Kaplan <ekaplan@bayareametro.gov>; Gillian Adams <gadams@bayareametro.gov>; Aksel Olsen <aolsen@bayareametro.gov>; lskjerping@cityofberkeley.info; mayor@cityofberkeley.info; rhna@TheCivicEdge.com
Cc: Carlos Romero <cromero_ezln@yahoo.com>; Fernando Marti <fernando@sfic-409.org>; Rodney Nickens Jr <rodney@nonprofithousing.org>
Subject: RHNA Evaluation Criteria

External Email

Dear ABAG Staff and Consultants-

Attached please find comments from several HMC members regarding evaluation criteria for assessing potential RHNA methodologies, particularly with respect to the equity and Affirmatively Furthering Fair Housing objectives.

We hope the HMC will have the opportunity to discuss and decide on the evaluation metrics and their application prior to making a final decision on the methodology formula itself.

We would appreciate it if this letter can be shared with all HMC members and the public.

Thank you.

_____

Jeff Levin, Policy Director

NOTE: I am generally in the office only on Monday afternoons and all day on Tuesday and Thursday, so I may not be able to reply to your e-mail right away.

East Bay Housing Organizations (EBHO)
538 Ninth Street, Suite 200 | Oakland, CA 94607
510-663-3830 ext. 316 | jeff@ebho.org

Join us or renew your membership for 2020! Thank you for supporting our efforts to protect, preserve and create affordable housing for all!

Visit us at www.EBHO.org and follow us on Facebook and Twitter

August 25, 2020

Dear ABAG Staff and Consultants,

As members of the Regional Housing Needs Allocation (RHNA) Housing Methodology Committee (HMC), we want to first thank you for your leadership and guidance in moving us forward on this complex process. We have been tasked with translating the statutory requirements and objectives of RHNA, as well as priorities and values of the Association of Bay Area Governments (ABAG), into a technical methodology. As such, there are many complementary outcomes that the RHNA methodology must work to achieve. The evaluative criteria that we will be discussing at the upcoming HMC meeting are critical to ensuring that our ruler for measuring our success at meeting these statutory objectives is accurate and equitable, and that applying the evaluative criteria to potential methodologies appropriately directs us towards how the factors and weights must continue to be refined to meet our desired outcomes.

We are writing today to comment specifically on the affirmatively furthering fair housing (AFFH) evaluative criteria. We first want to acknowledge and thank staff for thinking deeply about what a meaningful AFFH evaluative criteria might be. **While we support the general approach taken by staff, we believe the AFFH evaluative criteria as proposed does not sufficiently identify areas of long-standing racial and socioeconomic exclusion and ensure these jurisdictions receive appropriate and equitable allocations that affirmatively further fair housing in a meaningful way.**

- **The current criteria are not inclusive enough to meaningfully ensure AFFH.** The current proposed criteria only identify jurisdictions accounting for about 12 percent of the region's population. This is far too narrow a subset of jurisdictions to accurately reflect the extent of segregation across the region and thus too limited to make a meaningful difference in combating racial segregation and removing barriers to opportunity in our region. We recommend adjusting the criteria so they align more closely with existing research on the extent of segregation in the Bay Area.

- **New criteria must continue to include an explicit measure of racial exclusion.** We appreciate that in the current evaluative criteria, the divergence index is part of that composite metric. Having a metric like this, that deals explicitly with racial segregation is imperative to achieving the AFFH statutory obective and fulfilling our committement to racial equity. As staff work to refine or create a new AFFH evaluative criteria, a race-specific variable must be maintained. One method is to use **a more inclusive composite score** of divergence index and percent of households with above-moderate incomes for each jurisdiction, filtering out cities in the lowest quartile of median income to avoid further concentrating affordable housing in high segregation, low-income areas. Another way is to **measure exclusion of low-income Black and Latinx people of color, for example, looking at jurisdictions that have a below-average percentage**

of Black and Latinx combined, coupled with income (either a high proportion of moderate income or a median household income greater than $100,000).

● **The AFFH criteria must be designed to facilitate appropriate and equitable allocations that affirmatively further fair housing in a significant way.** For the group of cities identified as high exclusion, the allocations must be adjusted to ensure that these cities get a share of the region's housing need, particularly for very low and low income, that is higher than their share of the region's 2019 household distribution. We believe this metric and its application as a floor on allocations to exclusionary jurisdictions are necessary to ensure that this RHNA will change the patterns of racial segregation in our region.

We look forward to discussing this further at the August 28 HMC meeting.

Thank you for your hard work and attention to this matter.

Signed,

Jeffrey Levin
Fernando Marti
Rodney Nickens, Jr.
Carlis Romero

Fred Castro

From:	Eli Kaplan
Sent:	Thursday, August 27, 2020 4:54 PM
To:	Fred Castro
Cc:	Gillian Adams
Subject:	FW: Housing Methodology Committee Comment Letter from the City of Piedmont
Attachments:	2020-08-27 ABAG Plan Bay Area 2050 Housing Methodology Committee Letter.pdf

Hi Fred,

Forwarding another comment letter to the HMC. Thanks for your help!

Eli

Eli Kaplan
Regional Housing Policy Analyst
ekaplan@bayareametro.gov | 415-778-6722
Pronouns: he/him/his

Bay Area Metro | bayareametro.gov
Metropolitan Transportation Commission
Association of Bay Area Governments

From: John O. Tulloch <JTulloch@piedmont.ca.gov>
Sent: Thursday, August 27, 2020 4:52 PM
To: Regional Housing Need Allocation <rhna@bayareametro.gov>
Cc: vautin@bayareametro.gov; Gillian Adams <gadams@bayareametro.gov>; Ada Chan <achan@bayareametro.gov>;
Paul Fassinger <pfassinger@bayareametro.gov>; City Council <CityCouncil@piedmont.ca.gov>; Kevin Jackson
<kjackson@piedmont.ca.gov>; Pierce Macdonald-Powell <pmacdonald@piedmont.ca.gov>
Subject: Housing Methodology Committee Comment Letter from the City of Piedmont

External Email

Good Afternoon,

Attached is a letter from the City of Piedmont to the Housing Methodology Committee with comments on the 6th Cycle
RHNA Methodology.

If you have any questions, please contact Planning & Building Director Kevin Jackson at kjackson@piedmont.ca.gov

Thanks,

John O. Tulloch
Assistant City Administrator / City Clerk City of Piedmont
120 Vista Avenue
Piedmont, California 94611
Phone: (510) 420-3040
Fax: (510) 653-8272

CITY OF PIEDMONT
CALIFORNIA

August 27, 2020

Housing Methodology Committee Members   VIA ELECTRONIC MAIL
ASSOCIATION OF BAY AREA GOVERNMENTS
375 Beale Street, Suite 700
San Francisco, CA 94105

Re: City of Piedmont Comments on 6th Cycle RHNA Methodology

Dear Mayor Arreguín, Housing Methodology Committee Members, and ABAG Staff:

Thank you for your continued efforts to develop a methodology for equitably allocating the San Francisco Bay Area's housing needs. The City of Piedmont appreciates the contributions of staff and Housing Methodology Committee (HMC) members, and the opportunity to provide these comments.

The City of Piedmont is committed to increasing its supply of housing and expanding the variety of housing types available in our community, including affordable housing. We are writing now because the preliminary allocations shared with the HMC at its August 13th special meeting suggest that further revisions to the allocation model are needed before the numbers are finalized. The proposed approach produces skewed results for many of the region's smaller cities, with 8-year RHNA assignments that vastly exceed 30-year regional growth forecasts for these communities. In general, small communities have a very small share of the region's transit and transportation infrastructure, limited land supply, and severe growth constraints, including high fire hazards.

We request further information on the methodology for calculating the household growth projections for the City of Piedmont in the draft 2050 Households Blueprint (draft Blueprint), as the data for Piedmont is not consistent with prior forecasts or the City's physical limitations. According to the ABAG bar charts included in the agenda packet for the August 13th HMC meeting, Piedmont's draft RHNA using the "2050 Households Blueprint Baseline" ranges from 530 to 560 units. By comparison, the 30-year growth forecast (2010-2040) for Piedmont expressed in ABAG's Plan Bay Area 2040 was 50 households total.

It appears that one of the reasons for this sharp spike in the number of housing units is because the baseline 8-year growth projection in the draft 2050 Blueprint for Piedmont is 440 units. The Blueprint jurisdictional growth projections were not available for public review until August 11, 2020. As stated in the City's comment letter sent to you and ABAG on August 10, 2020, more time must be provided to cities and the general public to evaluate the accuracy of the data inputs in the draft 2050 Blueprint and the assumptions used in the modeling of future growth.

The City understands that the draft Blueprint for Plan Bay Area 2050 expects high resource areas and transit rich areas to provide more housing than in years past. In order to fully participate in the regional planning process and the discussions surrounding housing equity and social justice, the City of Piedmont continues to request greater transparency in the methodology used by ABAG staff to develop the draft Blueprint growth projections.

Just as ABAG considers jobs, transit, and high opportunity areas as weighting factors in its model, land supply constraints also should be considered. In Piedmont's case, the City is 1.7 square miles and landlocked. Piedmont was developed between 1910 and 1930 and reached buildout in the 1960s. Its developable land supply consists of approximately 60 scattered single-family lots, many located on very steep slopes or on narrow streets. The City has 3.7 acres of commercial/mixed-use zoned land and 3.7 acres zoned multi-family, all of it developed.

If every parcel in the commercial/mixed-use and multi-family zones were to be redeveloped at 20 units per acre, the City could realize an increase of approximately 100 net housing units. Piedmont has worked hard to meet its prior RHNAs through innovative programs aimed at accessory dwelling unit (ADU) production, taking advantage of the sites available in the single-family zone. Piedmont was one of the first cities in the Bay Area to provide incentives for rent-restricted ADUs serving very low income residents, through an award winning program. Piedmont was also one of the few Bay Area cities to entirely meet its RHNA requirement for very low-income households during the last (2007-2014) cycle.

The City of Piedmont coordinates other housing programs such as the Measure A1 (2016) housing bond and federal housing programs with Alameda County to address the housing crisis with a county-wide strategy. Piedmont property owners have already voted to assess their properties over $17 million for the life of the bond in order to build state-of-the-art affordable housing with the social services and access to transit and jobs that are needed to make housing programs successful. The majority of Measure A1's $580 million made available for affordable housing will be spent in Oakland, Berkeley, Hayward and unincorporated Alameda County, where large parcels of land are available, supported by transportation infrastructure.

The City of Piedmont was allocated $2.2 million of Measure A1 funding. Using the Measure A1 funds, as well as SB 2 and LEAP grants, we are about to embark on a planning project to explore new ways to increase production during the next RHNA cycle. Due to the relatively small amount of Measure A1 funding and the City's physical constraints, we estimate that the resulting increase in housing will be constrained. The City of Piedmont will continue to search for creative solutions to substantially increase housing production in the future. City staff would like to share these successful strategies and remaining challenges in discussions with ABAG staff as part of the regional planning process.

In addition, a portion of the City of Piedmont is designated as Very High Fire Hazard Severity Zone by the State of California. The remainder of the City is designated as a Wildfire Urban Interface (WUI) Zone and at extreme risk during a wildfire due to the City's topography, which

includes canyons and steep hillsides. Existing roads developed between 1910 and 1930 are very narrow and winding. The marginal and inadequate streets already increase emergency response times above industry standards and are expected to hinder evacuation in the event of a wildfire or other emergency.

Careful planning is required to site new housing to not add to the delay in response by emergency personnel and not negatively impact evacuations, avoiding property damage and casualties in a major disaster.

In closing, we urge the HMC to continue to refine its model to include an adjustment or weighting factor for smaller cities that have been acknowledged by ABAG (through its prior forecasts) to have limited growth potential. The job of implementing the RHNA will ultimately fall to local elected leaders who must be able to answer constituents' questions and concerns. Our community stands ready to plan for a much higher RHNA than we've seen in the past, but ask that you give due consideration to the physical constraints and natural hazards that inform local land use decisions.

Sincerely,

CITY OF PIEDMONT

Sara Lillevand
City Administrator

CC: City Council
      ABAG Regional Housing Needs Allocation Staff, via RHNA@bayareametro.gov
      Dave Vautin, AICP, ABAG Assistant Director, Major Plans via dvautin@bayareametro.gov
      Gillian Adams, Principal Planner, RHNA via gadams@bayareametro.gov
      Ada Chan, ABAG Regional Planner, via achan@bayareametro.gov
      Paul Fassinger, Regional Planning Program, Bay Area Metro, via pfassinger@bayareametro.gov

Fred Castro

External Email

Dear Housing Methodology Committee (HMC) Members, ABAG Regional Housing Needs Allocation Staff, and Fred Castro, Clerk of the Board, Association of Bay Area Governments,

The attached comment letter pertains to Item 5a on your August 28 HMC agenda, Refining RHNA Methodology Concepts.

Thank you for the opportunity to comment on and engage in this critical work effort.

Regards,

CLARE CAMPBELL
Manager of Long Range Planning
Planning and Development Services
(650) 617-3191 | clare.campbell@cityofpaloalto.org
www.cityofpaloalto.org

CITY OF PALO ALTO

August 26, 2020

Housing Methodology Committee Members
Submitted Via Email To: info@bayareametro.gov

RE: Preferred Methodology for 6th Cycle RHNA

Dear Committee Members,

Thank you for your work and consideration of Palo Alto's August 11, 2020 comment letter.

The City of Palo Alto continues to advocate for the 2019 Household as baseline allocation for the RHNA methodology using an income shift up to 150%.

On August 13th the Housing Methodology Committee (HMC) indicated its preference for an alternative Future Year 2050 Households approach. This concept incorporates future household growth over 30 years in reliance on aspirational policy and financial commitments that cannot be assured and could take decades to implement, if endorsed.

This alternative disproportionately burdens some jurisdictions on the peninsula and south bay with housing growth targets that are unrealistic and will not be achieved despite local jurisdiction efforts to produce housing. Accordingly, despite our shared efforts, the region will again fall short of its housing goals.

If the Future Year 2050 Household baseline is formally recommended to the Executive Board, this alternative must include a cap that establishes a minimum and maximum percent change to a jurisdiction's increase in housing units. Establishing a reasonable threshold would ensure housing units are more fairly distributed throughout the region and likely produce more housing units.

The City of Palo Alto is also deeply concerned about process irregularities associated with the HMC meetings and the lack of time afforded to committee members and the public to absorb and make informed comments on new analysis and data presented only days before scheduled meetings. The rapid schedule, complexity of the information and questionable agenda postings undermine a sincere desire for participation and robs the HMC committee members of their stewardship responsibilities and jeopardizes public legitimacy.

As no formal action has been taken on the methodology baseline, the City of Palo Alto requests reconsideration of the 2019 Household approach or incorporation of reasonable threshold limits with the Future Year 2050 Household alternative baseline.

Thank you for your continued consideration.

Ed Shikada
City Manager

CC:
Palo Alto City Council Members
ABAG Executive Board Members
Molly Stump, City Attorney, City of Palo Alto
Jonathan Lait, Director, Planning and Development Services Department, City of Palo Alto
ABAG Regional Housing Needs Allocation Staff, RHNA@bayareametro.gov
Fred Castro, Clerk of the Board, Association of Bay Area Governments,
fcastro@bayareametro.gov
rhna@TheCivicEdge.com