City Council

Mike Anderson, Mayor
Susan Candell, Vice Mayor
Steven Bliss, Council Member
Cameron Burks, Council Member
Teresa Gerringer, Council Member

May 11, 2020

Housing Methodology Committee
Association of Bay Area Governments
Bay Area Metro Center
375 Beale Street, Suite 800
San Francisco, CA 94105-2066

Dear Chair Arreguin and Members of the Housing Methodology Committee:

We wish to request that the Housing Methodology Committee work to address potential impacts of the COVID-19 pandemic in its allocation methodology. As this crisis is unprecedented in modern times, the effect of the pandemic on the economy cannot be overlooked. While we applaud efforts to move the projected timeline for the Department of Housing and Community Development (HCD) to release the allocation to sometime this summer, as opposed to the original target of April, the full impact on local economies by the COVID-19 virus may not be felt until later in the year. As such, any methodology developed for the allocation of units should be paused until a clearer picture of the economy emerges.

When the allocation process does resume at an appropriate time, the ultimate RHNA methodology should focus on the location of existing jobs (jobs-housing balance), not whether a job is accessible within 30 minutes by car or 45 minutes by transit. Countless hours of productivity are lost annually in the Bay Area due to traffic congestion; new housing production should not exacerbate the problem. In addition, job growth must be factored in to the RHNA allocation, as new jobs present a substantial factor in the housing crisis. With the COVID-19 outbreak, the outlook for job growth is murky, at best.

The methodology and future housing growth should capitalize on existing infrastructure and transit connectivity thereby reducing congestion, vehicle-miles traveled and greenhouse gas emissions. Any data supporting reducing long commutes, congestion, VMT, and greenhouse gas emissions would also illustrate that new housing should go where jobs are. Lastly, the region should avoid placing additional housing in areas with natural hazards like Very High Fire Hazard Zones and areas vulnerable to sea level rise.

We appreciate the Committee's willingness to consider these requests.

Sincerely,

Mike Anderson
Mayor

Page 1 of 2

C: Housing Methodology Committee Members: Josh Abrams, Susan Adams, Anita Addison, Rupinder Bolaria, Rick Bonilla, Michael Brilliot, Monica Brown, Amanda Brown-Stevens, Paul Campos, Ellen Clark, Diane Dillon, Forrest Ebbs, Pat Eklund, Jonathan Fearn, Victoria Fierce, Neysa Fligor, Mindy Gentry, Russell Hancock, Paolo Ikezoe, Welton Jordan, Megan Kirkeby, Brandon Kline, Jeffrey Levin, Scott Littlehale, Fernando Marti, Rodney Nickens, Jr., Julie Pierce, Bob Planthold, Darin Ranelletti, Matt Regan, Jane Riley, Carlos Romero, Elise Semonian, Aarti Shrivastava, Vin Smith, Matt Walsh

Therese Watkins McMillan, Executive Director, Association of Bay Area Governments
Gillian Adams, Principal Planner, ABAG Regional Planning Program
Keely Martin Bosler, Director, Department of Finance
Therese Watkins McMillan, Executive Director, Association of Bay Area Governments
Zachary Olmstead, Chief Deputy Director, Housing Policy Development
Steve Glazer, State Senator, 7th District
Rebecca Bauer-Kahan, Assemblymember, District 16

From:	Aaron Eckhouse
To:	Regional Housing Need Allocation; MTC Info
Subject:	Re: ABAG Housing Methodology Committee (5/14 meeting)
Date:	Tuesday, May 12, 2020 1:10:22 PM
Attachments:	YIMBY RHNA Letter.pdf

Please find attached comments from a coalition of regional pro-housing organizations on the allocation methodology for RHNA. We commend the Committee for the work they have done so far & hope these comments are helpful to their important work.

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515-418-8175
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sv@home

URBAN ENVIRONMENTALISTS

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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,

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Sonja Trauss
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From:	Kathryn Hughes
To:	MTC Info
Subject:	Overpopulation
Date:	Wednesday, May 13, 2020 8:07:10 AM

External Email

Many of us are talking about how there are just too many of us on this planet. The virus thrives in overcrowded conditions and perhaps is trying to tell us to focus on lower density housing made possible by lowering demand. Promoting birth control and family planning worldwide is perhaps the best response to many of the ills we are facing: road congestion, a world wide issue, as well as loss of animal and plant habitats, etc. People often forget we also need urban greenery and parks everywhere to protect our lungs. We can't just mow down everything in the city as we are now doing in the hope of curbing growth in the suburbs and think people will want to stay in an urban environment.. I live on a so call smart corridor and deal with noise and pollution daily=-this model is simply not working.

Please look at the tenets of the no-growth argument… it may be that slowing growth will actually promote economic prosperity in the long run rather than detracting from it. We are having the wrong conversation. If you haven't, require your staff to read the book Sapiens. It addresses this issue among others, pointing out how we humans have taken more than our share of the world's resources. Smart growth and transit corridors and transit villages….these looked good some years ago, but their time has passed.

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