

July 7, 2020

To:

Therese W. McMillan, Executive Director
Association of Bay Area Governments
375 Beale Street, Suite 700 San Francisco, CA 94105

CC:

Alix Bockelman, Deputy Executive Director, Policy
Association of Bay Area Governments
375 Beale Street, Suite 700 San Francisco, CA 94105

Bradford Paul, Deputy Executive Director, Local Government Services
Association of Bay Area Governments
375 Beale Street, Suite 700 San Francisco, CA 94105

Megan Kirkeby, Acting Deputy Director,
DIVISION OF HOUSING POLICY DEVELOPMENT
2020 W. El Camino Avenue, Suite 500 Sacramento, CA 95833

Tom Brinkhuis, Housing Policy Specialist
DIVISION OF HOUSING POLICY DEVELOPMENT
2020 W. El Camino Avenue, Suite 500 Sacramento, CA 95833

SUBJECT: Request for Additional Time for ABAG to File an Objection to HCD's Regional
Housing Need Determination

We are formally requesting that ABAG file an objection to HCD's regional housing need determination, or at a minimum request additional time to file an objection. We request this speaking for ourselves as individual, elected council members, not speaking for the entire Palo Alto City Council, which is currently on summer hiatus. Our reasons are described below.

The California Department of Housing and Community Development (HCD) has announced that unless formally appealed by ABAG, their regional housing determination numbers will be finalized on July 10, 2020, with no provision for further appeal. These numbers are based on a model based on aggressive jobs growth in already jobs-rich areas. These job growth numbers have been translated into unachievable housing growth rates, especially affordable housing growth rates, that simply cannot be met under any zoning without massive outside investments – subsidies which have never been forthcoming in the past, and are unlikely to appear in the future. The HCD plan represents a gigantic unfunded mandate.

The model calls for 57.4% of new housing to be Below Median Income. Yet in the current RHNA cycle, only about 8% of actual permits have been BMI, within the core job-rich Santa Clara County north of Morgan Hill, Gilroy and San Jose (Southern California News Group, December 2019). To

go from 8% BMI to 57% BMI without vast financial assistance is unrealistic. Adopting an impossible plan benefits no one, and trying to enforce one may lead to legal battles.

Further job proliferation in jobs-rich areas is not inevitable: it is a choice. We do not have to make this choice. We can offer incentives for jobs to grow in other Bay Area cities that need them. This flawed model that concentrates job growth in Silicon Valley (with only tepid job growth in San Jose and the East Bay) has created jobs-housing imbalances that have produced growing congestion, the highest housing prices in the country, stratospheric West Bay land and construction costs that cannot be afforded by any housing project except the most opulent – certainly not by Below-Medium-Income housing projects – , and high levels of income inequality. The resulting displacement of employees to the far reaches of the region or even to other states falls disproportionately on the lowest-income workers, a circumstance both unfair and unsustainable. By further concentrating new jobs in the already most-concentrated areas, the HCD plan actually makes the problem worse.

Yet, the very California Government Code that HCD cites to justify their Determination (Section 65584.01) also requires an open discussion of alternate ways of improving jobs distribution to reduce jobs-housing imbalances. Although presented with data on the dreadful imbalances between the various parts of the Bay Area, ABAG and HCD have refused to explore any such sub-regional alternatives in public sessions. In fact, they concluded in their own in-house process with no detailed look at data that “It is not recommended that we move forward with looking at placing jobs caps in jobs-rich cities.” (Futures Final Report, December 2019.)

It is imperative that the cities of the West Bay, through their City Councils, have a chance to explore the potential beneficial impacts of alternate patterns of sub-regional job growth. City Councils must have the right to engage their citizens in a full discussion of the final Regional Housing Need Determination (RHND) numbers. It’s far easier to put new jobs where housing costs are lower already, than it is to add large amounts of low-cost housing into some of the most job-concentrated and expensive land in the nation -- at least, without spending immense amounts of public money on it, which Sacramento has never been willing to do.

Citizens of the West Bay have requested the opportunity to explore the impact of alternative ways of remedying existing jobs-housing imbalances, but have been completely ignored by MTC/ABAG, despite the requirements of California Code Section 65584.01.

Further, despite the clear disruptions of the COVID crisis, the MTC/ABAG Planning Committees announced in May 2020 that while the COVID crisis would affect short-term patterns in the Bay Area, it would not affect their long-term jobs growth projections (MTC/ABAG Planning Committee, May 8, 2020.)

The HCD numbers for the Bay Area were sent to the Palo Alto Council by our staff on June 22. As were many cities, our city council was consumed throughout the spring dealing with the Covid 19 health emergency, large cuts to our annual budget, emergency programs to support local business, and policy reviews to combat systemic racism. Our last meeting before summer recess was June 23, giving our council no chance to formally respond to the HCD housing numbers.

The appeal deadline must be postponed a minimum of three months to allow further participation and review by the local governments and communities who will be affected by this sweeping plan. We urge ABAG to either file an objection to HCD's regional housing needs determination or request an additional three months to file an objection

Best Regards,

Tom DuBois, Vice Mayor

Tom DuBois

Eric Filseth, Council Member and former Mayor

DocuSigned by:
Eric Filseth
C2D82A850C57408...

Lydia Kou, Council Member

DocuSigned by:
Lydia Kou
A4A849B080904C0...

From: [william.goodwin](#)
To: [MTC-ABAG Info](#)
Subject: Comment on item 6.b. 20-0986
Date: Wednesday, July 8, 2020 3:27:30 PM

External Email

Please Allocate Funding for Affordable Housing in High Opportunity Areas.

Good Afternoon. Commissioners.

My name is William GOODWIN. I live in Pittsburg - that's East County. I am a member of the Resident Empowerment Program w/Hope Solutions.

Our **Purpose** is to empower affordable housing resident to advocate for the creation and retention of affordable housing and supportive services.

I am writing in today to request ABAG Commissioners to Allocate more Funding for Affordable Housing in High Opportunity Areas. I am a single Father, after becoming disabled it took us 7 years, to find housing that was affordable for me and my daughter. I was number 2,398 in a list of 2500 applicants when I found housing. Recently there was an Affordable Housing Complex, in Walnut Creek that had a waiting list of 5000 applicants. That is why it is imperative that we **Allocate more Funding for Affordable Housing in High Opportunity Areas, for the 2000 unhoused applicants I left when I was housed, for the 5000 applicants on that waiting list in Walnut Creek, and for the hundreds of thousands of other marginalized unhoused families in California.**

Thank You.

Have a great evening.

,

From: [Eli Kaplan](#)
To: [Fred Castro](#)
Cc: [Gillian Adams](#)
Subject: FW: Request for Additional Time for ABAG to File and Objection to HCD" regional Housing Numbers.
Date: Wednesday, July 8, 2020 2:18:14 PM

Hi Fred,

Forwarding another public comment on the same topic as the previous one. 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: Suzanne Keehn <dskeehn@pacbell.net>
Sent: Wednesday, July 8, 2020 1:54 PM
To: Therese W. McMillan <tmcmillan@bayareametro.gov>
Cc: Regional Housing Need Allocation <rhna@bayareametro.gov>; megan.kirkeby@hcd.ca.gov; tom.brinkhuis@hcd.ca.gov; sitesinventory@hcd.ca.gov; Alix Bockelman <ABockelman@bayareametro.gov>; Brad Paul <bpaul@bayareametro.gov>
Subject: Request for Additional Time for ABAG to File and Objection to HCD' regional Housing Numbers.

External Email

I live in Palo Alto, and am part of the West Bay. We hope and are asking for you to take this opportunity to explore different methods of addressing the jobs-housing imbalance. This plan leads to a high cost of living, pollution, traffic congestion, and loss of local control and livability. There are other areas, such as San Jose, and other cities on the other side of the Bay, that would welcome more jobs, and they have the housing.

Sincerely,

Suzanne Keehn
Palo Alto, 94306

From: [Hunter Oatman-Stanford](#)
To: [MTC Info](#)
Subject: Re: Don't plan to fail! Appeal for a higher RHND
Date: Thursday, June 25, 2020 4:19:12 PM

External Email

OK - this is for the Housing Methodology Committee
(Next meeting is
Thursday, July 9, 2020
2:00 p.m.)

On Thu, Jun 25, 2020 at 3:19 PM MTC Info <info@bayareametro.gov> wrote:

Thank you for your email. Please identify to whom you are directing this comment to.

In the future, public comment can only be recorded if the Committee and meeting date are identified in the subject line and are submitted by 5pm the day before the meeting date.

Thank you-

MTC-ABAG Public Information

From: Hunter Oatman-Stanford [mailto:hoatmanstanford@gmail.com]
Sent: Thursday, June 25, 2020 3:06 PM
To: MTC Info <info@bayareametro.gov>
Subject: Don't plan to fail! Appeal for a higher RHND

External Email

Dear ABAG officials:

We call on the Association of Bay Area Governments to do their duty and — at the very least — plan to make the Bay Area more affordable and reduce overcrowding by planning for sufficient housing production. Please appeal to HCD for a more realistic target to meet our region's needs.

sincerely,

Hunter Oatman-Stanford

From: [Charlie Stigler](#)
To: [MTC Info](#)
Cc: mayor@cityofberkeley.info
Subject: Re: Disappointing housing targets [Housing Methodology Committee 7/9/20]
Date: Thursday, June 25, 2020 3:13:07 PM

External Email

This email is directed to the ABAG Housing Methodology Committee, meeting on July 9th, 2020.

-Charlie

On Thu, Jun 25, 2020 at 3:08 PM MTC Info <info@bayareametro.gov> wrote:

Thank you for your email. Please identify to whom you are directing this comment to.

In the future, public comment can only be recorded if the Committee and meeting date are identified in the subject line and are submitted by 5pm the day before the meeting date.

Thank you-

MTC-ABAG Public Information

From: Charlie Stigler [mailto:charlie@charliestigler.com]
Sent: Thursday, June 25, 2020 11:37 AM
To: mayor@cityofberkeley.info; MTC Info <info@bayareametro.gov>
Subject: Disappointing housing targets

External Email

Dear ABAG and President Arreguín,

I was very disappointed to see the housing targets recently announced by ABAG and HCD. If all we're aiming for is to maintain the status quo, they're fine. But the status quo is terrible. The Bay Area housing crisis is the biggest challenge to the future of our region, and things need to change.

I urge you to set a target of 1,000,000 homes. I'd rather try and fail than give up on our region completely.

Best,

Charlie Stigler

Strategist at Workday, and San Francisco resident

From: [Julia Berg](#)
To: [MTC Info](#)
Subject: Don't plan to fail! Appeal for a higher RHND
Date: Saturday, June 27, 2020 6:43:39 AM

External Email

We call on the Association of Bay Area Governments to do their duty and — at the very least — plan to make the Bay Area more affordable and reduce overcrowding by planning for sufficient housing production. Please appeal to HCD for a more realistic target to meet our region's needs.

Julia Berg
949-202-6085

From: [Brian Bills](#)
To: [MTC Info](#)
Subject: We need a higher RHND
Date: Friday, June 26, 2020 11:15:35 PM

External Email

Please set a higher housing target! The Bay Area has been slowly suffocating to death from a lack of housing. I'm fleeing San Francisco despite the fact that I love it here, because \$2700 for a one-bedroom apartment is insane. Please, build more housing!

From: [Rachael Byrne](#)
To: [MTC Info](#)
Subject: Don't plan to fail! Appeal for a higher RHND
Date: Saturday, June 27, 2020 7:13:14 AM

External Email

We call on the Association of Bay Area Governments to do their duty and — at the very least — plan to make the Bay Area more affordable and reduce overcrowding by planning for sufficient housing production. Please appeal to HCD for a more realistic target to meet our region's needs.

From: [Cupertino ForAll](#)
To: [MTC Info](#); mayor@cityofberkeley.info
Subject: Don't plan to fail! Appeal for a higher RHND
Date: Saturday, June 27, 2020 7:32:14 PM

External Email

We call on the Association of Bay Area Governments to do their duty and — at the very least — plan to make the Bay Area more affordable and reduce overcrowding by planning for sufficient housing production. Please appeal to HCD for a more realistic target to meet our region's needs.

-Cupertino for All
The Pro-Housing Voice of Cupertino

From: [Dan Klempay](#)
To: [MTC Info](#)
Subject: Don't plan to fail! Appeal for a higher RHND
Date: Saturday, June 27, 2020 2:58:27 PM

External Email

We call on the Association of Bay Area Governments to do their duty and — at the very least — plan to make the Bay Area more affordable and reduce overcrowding by planning for sufficient housing production. Please appeal to HCD for a more realistic target to meet our region's needs.

Sincerely,
Dan Klempay

From: [David Maltzan](#)
To: [MTC Info](#)
Subject: Don't plan to fail! Appeal for a higher RHND
Date: Saturday, June 27, 2020 3:41:22 PM

External Email

We call on the Association of Bay Area Governments to do their duty and — at the very least — plan to make the Bay Area more affordable and reduce overcrowding by planning for sufficient housing production. Please appeal to HCD for a more realistic target to meet our region's needs.

Sincerely,

David Maltzan
450 Duboce Ave, San Francisco, CA 94117

From: [Chris Paciorek](#)
To: [MTC Info](#)
Subject: please appeal for a higher RHND
Date: Sunday, June 28, 2020 10:57:49 AM

External Email

I'm writing to ask that ABAG make every effort to plan for the amount of housing the Bay Area needs. We are woefully behind, and the current plan won't fix that.

Please appeal to HCD for a more realistic target to meet our region's housing needs.

- Chris Paciorek