

## Fred Castro

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**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

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### \*External Email\*

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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

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**From:** Noah Housh <NHoush@cotaticity.org>  
**Sent:** Thursday, August 27, 2020 6:18 PM  
**To:** Fred Castro; rhna@thecivicedge.com; Regional Housing Need Allocation  
**Cc:** Eli Kaplan; David Woltering; Noah Housh; 'anicholson@srcity.org'; 'Beiswenger, Jeffrey'; dstorer@sonomacity.org; 'Garcia, Jenna'; 'hhines@ci.petaluma.ca.us'; Jane Riley; 'jjones@townofwindsor.com'; 'Kari Svanstrom'; 'Kevin Thompson'; Lyle, Amy; Jane Riley  
**Subject:** HMC RHNA Comment Letter-August 28, 2020 Agenda  
**Attachments:** Sonoma County HMC RHNA Methodology Comment Letter.pdf

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### \*External Email\*

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Hello Fred,

Please find the attached letter providing delegate comments on the HMC RHNA allocation process. Please ensure this letter is amended to the agenda and included into the public record.

My apologies for not getting it in earlier.

Thank you,

**Noah Housh**

Director of Community Development  
City of Cotati  
201 West Sierra Avenue, Cotati, CA 94931  
Office: (707) 665-3635  
<http://www.cotaticity.org/>





Community Development Department

Association of Bay Area Governments (ABAG)  
Metropolitan Transportation Commission (MTC)  
Housing Methodology Committee (HMC)  
375 Beale Street, Suite 800  
San Francisco, California 94105

Re: Regional Housing Needs Assessment (RHNA) Allocation Process

HMC Members & ABAG/MTC Staff,

Thank you for the opportunity to participate in the ABAG/MTC RHNA HMC process. It has been an honor to participate with you all and to witness the dedication and commitment of the local planning community to address our housing challenges as a region. The North Bay provides unique benefits and amenities to the San Francisco Bay Area and as such, the Sonoma County delegation wishes to share the following perspective on the process and eventual outcome of the work of the HMC.

All of the cities in Sonoma County have significant concerns with using the Plan Bay Area Blueprint as the baseline data supporting the RHNA allocation process, and feel it would be a step backward from the smart, city centered, transit oriented growth policies and patterns regionally championed for decades. This is evidenced by the data in Appendix 2, of Item 5A on the August 28, 2020, HMC Agenda. Under the base line, communities such as Oakley, Brentwood, Napa, Morgan Hill, Gilroy, all of the Sonoma County communities and every unincorporated Bay Area County jurisdiction (most of which are far from urban amenities and job centers), are being allocated a RHNA which would push exponential growth in these communities. This fault is compounded by many of the urban job centers (such as San Francisco, Palo Alto and Santa Clara) and their wealthy enclaves (such as Las Altos Hills and Woodside) receiving some of the lowest allocations (by-percentage). How does using this model as a "baseline" represent good planning and a sustainable model for growth when it would clearly perpetuate sprawl and lack of access to transit and jobs?

Further, using the 2050 Blueprint as a baseline also appears to "frontload" long-range growth strategies, unrealistically allocating a large proportion of a community's total build-out into the 8 year RHNA cycle (instead of over the 30-year time frame of Plan). This results in RHNA allocations that are completely unreachable and does not allow for smart, planned, growth over the long-range planning horizon (case in point: rural Solano County would have a RHNA allocation that required a growth of 41%; and Sebastopol would have an allocation in excess of the General Plan build-out for its city limits). Further, use of the Plan does not seem to consider



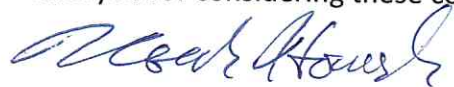
transit or infrastructure limitations of many of these communities, to say nothing of the natural hazards we have recently (and are currently) experienced.

All of this said it is recognized that there is no perfect methodology, and any effort to allocate our regional growth will create winners and losers. Early in the HMC process with ABAG/MTC, HMC members discussed the merits of various approaches to allocating the RHNA to all jurisdictions in the Bay Area. The primary concerns voiced by a vast majority of HMC members during these early discussions included ensuring “high resource” areas construct an increased number of housing units to serve lower income individuals and families; ensuring significant displacement of existing lower income communities (gentrification) be avoided; and providing a methodology to allocate a significant number of the region’s housing units in close proximity to transit services (to minimize the pressures and impacts of urban sprawl). Several resulting scenarios were then voted upon by the HMC with three allocation scenarios clearly receiving the top number of votes; the Bottom-Up Approach, Income Shift Approach and the Income Crescent Approach. Unfortunately, the pressure to utilize the 2050 Blueprint seems to have pushed these primary goals away from the forefront of the conversation. These foundational elements need to be brought back into the allocation methodology discussion as the HMC begins to settle onto a chosen course.

Based on this perspective (notwithstanding the above voiced concerns) and with an understanding that the HMC and ABAG/MTC staff have conceptually supported moving in the direction of the 2050 Households Blueprint data as a baseline, the Sonoma County communities support the use of Option 2A identified in Appendix 2 (of the attachments) as the best allocation factors to apply. This seems to provide the broadest “spread” of allocations across our communities and takes a “best for most” approach to allocating our growth. Further, this combination seems to most directly implement the voiced goals of the HMC, namely by reducing the number of units proposed in the far reaching cities and un-incorporated areas of the Bay Area; by continuing city-centered growth, locating a greater share of housing units in urban, job rich areas; and by pushing some of our “high resource” communities to increase their housing production to expand access to their resources.

This is a complex and challenging process to undertake, and I ask that all of the members focus on the stated goals identified by a majority of the HMC early in our deliberations. By keeping these concepts and intentions in the forefront of our process, any extraneous information or factors that are brought into the discussion can be addressed and managed with clear intent.

Thank you for considering these comments and perspective on our RHNA allocation process.



Noah Housh  
Community Development Director  
City of Cotati  
Sonoma County HMA Delegate

## Fred Castro

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**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.

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**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>; Iskjerping@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

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### \*External Email\*

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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.

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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](mailto: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](http://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 objective and fulfilling our commitment 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

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**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](mailto:ekaplan@bayareametro.gov) | 415-778-6722  
Pronouns: he/him/his

**Bay Area Metro** | [bayareametro.gov](http://bayareametro.gov)  
Metropolitan Transportation Commission  
Association of Bay Area Governments

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

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**\*External Email\***

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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](mailto: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  
ASSOCIATION OF BAY AREA GOVERNMENTS  
375 Beale Street, Suite 700  
San Francisco, CA 94105

VIA ELECTRONIC MAIL

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 13<sup>th</sup> 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 13<sup>th</sup> 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 RHNA 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

A handwritten signature in black ink, appearing to read "Sara", with a stylized, cursive script.

Sara Lillevand  
City Administrator

CC: City Council

ABAG Regional Housing Needs Allocation Staff, via [RHNA@bayareametro.gov](mailto:RHNA@bayareametro.gov)

Dave Vautin, AICP, ABAG Assistant Director, Major Plans via [dvautin@bayareametro.gov](mailto:dvautin@bayareametro.gov)

Gillian Adams, Principal Planner, RHNA via [gadams@bayareametro.gov](mailto:gadams@bayareametro.gov)

Ada Chan, ABAG Regional Planner, via [achan@bayareametro.gov](mailto:achan@bayareametro.gov)

Paul Fassinger, Regional Planning Program, Bay Area Metro, via [pfassinger@bayareametro.gov](mailto:pfassinger@bayareametro.gov)

## Fred Castro

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**From:** Sharon Goei <[sgoei@ci.milpitas.ca.gov](mailto:sgoei@ci.milpitas.ca.gov)>  
**Sent:** Thursday, August 27, 2020 6:04 PM  
**To:** Regional Housing Need Allocation; Fred Castro  
**Cc:** Steven McHarris; Rachelle Currie; Hanson Hom; Adam Marcus; Ned Thomas; Jay Lee  
**Subject:** City of Milpitas Comments on RHNA Methodology  
**Attachments:** Milpitas RHNA Comment Letter\_082720.pdf

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**\*External Email\***

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Dear ABAG Housing Methodology Committee:

Please see the attached comment letter from the City of Milpitas on the RHNA methodology.

Thank you,  
Sharon



**Sharon Goei**, P.E., CBO, LEED AP  
*Director of Building Safety and Housing*  
CITY OF MILPITAS  
455 E. Calaveras Blvd., Milpitas, CA 95035  
(408) 586-3260 [sgoei@ci.milpitas.ca.gov](mailto:sgoei@ci.milpitas.ca.gov)



# CITY OF MILPITAS

## OFFICE OF THE CITY MANAGER

455 EAST CALAVERAS BOULEVARD, MILPITAS, CALIFORNIA 95035-5479  
PHONE: 408-586-3059, [www.ci.milpitas.ca.gov](http://www.ci.milpitas.ca.gov)

August 27, 2020

**VIA EMAIL: [RHNA@BAYAREAMETRO.GOV](mailto:RHNA@BAYAREAMETRO.GOV)**

Association of Bay Area Governments and Metropolitan Transportation Commission  
Housing Methodology Committee  
Chair – Mayor Jesse Arreguin, City of Berkeley

### **Subject: City of Milpitas Comments on the Regional Housing Needs Allocation Methodology**

Dear Housing Methodology Committee:

The City of Milpitas appreciates the dedication and hard work of the ABAG/MTC staff and the Housing Methodology Committee over the last year. Housing remains a core issue for the Bay Area and it is challenging to balance so many factors. I am writing to share feedback from the City of Milpitas as you prepare to formalize your recommendations on the Regional Housing Needs Allocation (RHNA) methodology.

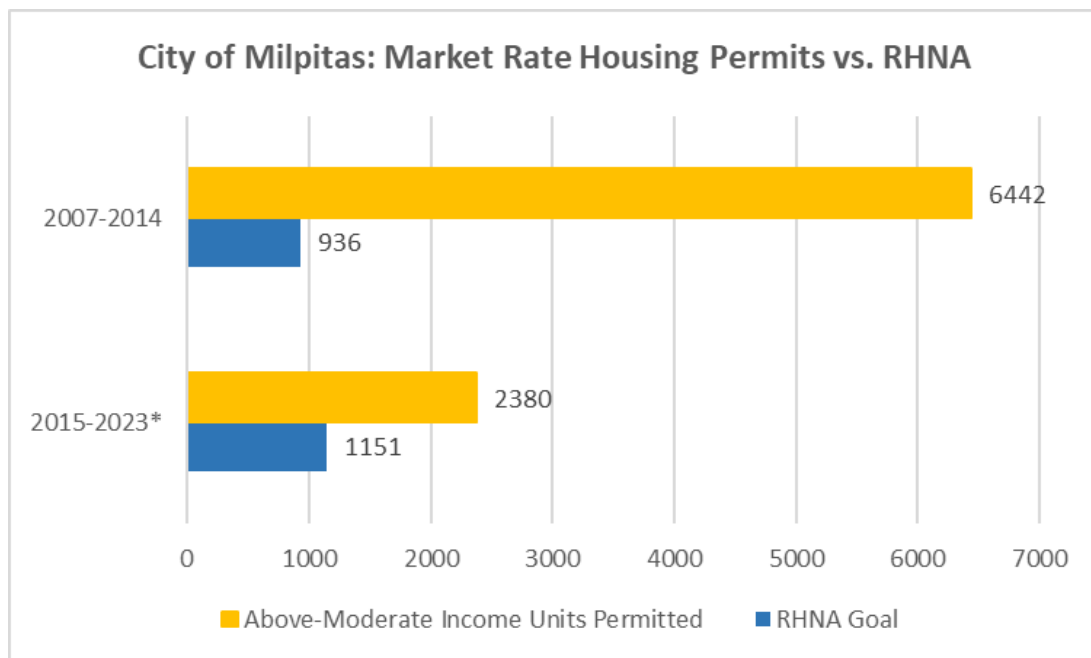
While we understand that the RHNA methodology must further the objectives identified in Housing Element Law and be consistent with the development pattern and outcomes envisioned in Plan Bay Area 2050, the Draft Blueprint sets forth ambitious goals for addressing the region's challenges and needs, particularly for the South Bay. Although the intent is to create a more affordable, connected, diverse, healthy, and vibrant Bay Area, we have concerns that using the Draft Blueprint as a baseline for the RHNA methodology will not achieve these goals.

The City of Milpitas supports prioritizing housing growth in high-resource and transit-served areas and near existing job centers, but we have a number of concerns about how the RHNA methodology will align with the goals of the Sustainable Communities Strategy (SCS) and SB 375, as well as the feasibility and practicality of achieving such a dramatic increase of housing in Santa Clara County. As such, we offer the following comments regarding the RHNA methodology:

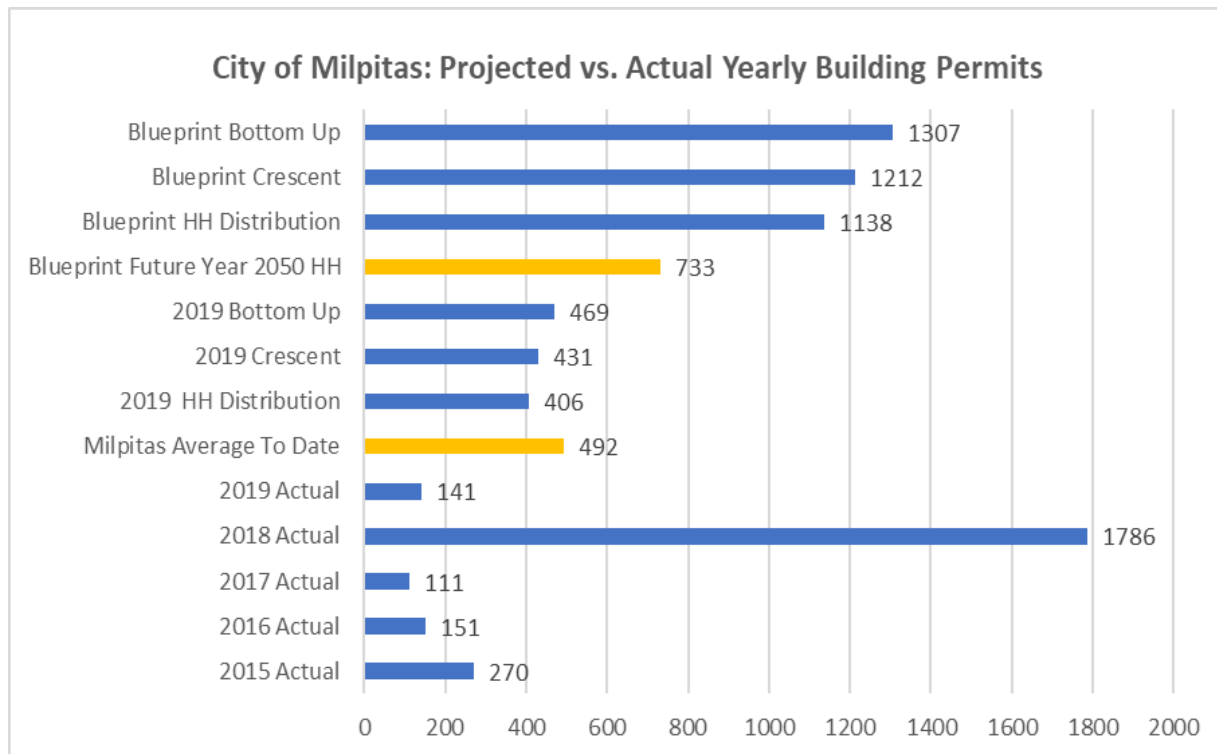
- 1. Cities Association of Santa Clara County Comments on the Plan Bay Area 2050 Draft Blueprint:** The City of Milpitas supports the comments made by the Cities Association of Santa Clara County Planning Collaborative on the Plan Bay Area 2050 Draft Blueprint. The Draft Blueprint locates a large percentage of growth in areas within Santa Clara County that do not currently have excellent access to transit. Additionally, the expected level of future growth in Santa Clara County jurisdictions is both unrealistic and unsustainable based on current and projected levels of infrastructure spending. For the reasons listed in the Planning Collaborative's letter, the City of Milpitas does not recommend using the "Future Housing Growth 2015-2050 (Draft Blueprint)" as the baseline for the RHNA methodology. Instead, the City supports the HMC's straw vote on August 13th to use the new option, "Blueprint Future Year 2050 Households" which finds a middle balance

and calls for a more feasible pace of housing growth in Milpitas. The letter from the Cities Association of Santa Clara County Planning Collaborative is attached for reference.

2. **Milpitas has sustained dramatic housing growth:** Milpitas is one of the rare cities that has exceeded its market rate housing production goals for two consecutive RHNA cycles. This growth was made possible by long range planning, zoning and infrastructure investments. We encourage the HMC to consider this unprecedented growth when right sizing future market rate housing in the South Bay. The below chart compares actual housing permit activity in Milpitas with its RHNA goals:



3. **Milpitas Housing Growth:** Since 2000, Milpitas's rate of housing growth has significantly outpaced the rate for Santa Clara County, a region that has experienced substantial growth during this time. Due to the previously strong economic climate and anticipation of the newly opened Milpitas BART Station, Milpitas experienced unprecedented housing growth in the last few years and has been recognized by the 2020 US Census as one of the fastest growing cities in California and in the US. However, the BART effect is unlikely to sustain such high levels of construction because much of the land around the station has been developed. Without such a major driver of growth, the housing market in Milpitas could fall short of the annual housing goals called for in the Draft Blueprint (1,138 to 1,307 units per year). The chart below compares the City's recent annual housing production with the RHNA baseline scenarios proposed by ABAG/MTC. Using the Draft Blueprint as a baseline would more than double the annual RHNA for Milpitas as compared to using the 2019 household distribution as a baseline. Using "Blueprint Future Year 2050 Households" as a baseline results in ambitious but more realistic housing growth that is closer to our yearly average as shown in the chart below.



4. **Jobs Housing Balance:** The Draft Blueprint calls for Milpitas to accommodate 1% of the region's job growth, but 7% of the region's housing growth. This would shift Milpitas's already balanced jobs-housing ratio toward housing. Meanwhile, major jobs-rich cities such as San Francisco and Berkeley, which are also well-served by transit, would receive an allocation that is below the regional average.

The City of Milpitas wholly recognizes our responsibility to add housing to address the current housing crisis and provide for future growth. Milpitas has exceeded our market rate RHNA goals for the last thirteen years and we are planning for significant new housing development through updates to our General Plan and two Specific Plans. The General Plan update will be completed by the end of 2020, and updates to both Specific Plans will be completed by the end of next year. However, the use of the Draft Blueprint assumptions in the RHNA methodology would result in housing growth in Milpitas that is unrealistic and at odds with stated SCS goals. We support the HMC's straw vote on using the "Blueprint Future Year 2050 Households" as the baseline for applying other RHNA methodology factors. In this way, we can add housing and infrastructure more gradually so communities like Milpitas can grow sustainably over the next 30 years.

Sincerely,

Steven G. McHarris  
City Manager  
City of Milpitas





P.O. Box 3144  
Los Altos, CA 94024  
[www.citiesassociation.org](http://www.citiesassociation.org)  
408-766-9534

August 10, 2020

Association of Bay Area Governments and Metropolitan Transportation Commission  
Bay Area Metro Center  
375 Beale Street, Suite 800  
San Francisco, CA 94105-2066  
Via E-mail: [info@planbayarea.org](mailto:info@planbayarea.org)

Re: Planning Collaborative Comments on Plan Bay Area 2050 DRAFT Blueprint

Dear ABAG Executive Board and MTC Commissioners:

On behalf of the Cities Association of Santa Clara County Planning Collaborative which includes the fifteen cities and the county, we offer our comments on the Draft Blueprint for Plan Bay Area (PBA) 2050.

As a general vision for the future growth and evolution of the Bay Area through 2050, the Blueprint sets forth an ambitious agenda for addressing the region's challenges and directing growth. While we understand your goal is to create a more affordable, connected, diverse, healthy and vibrant Bay Area, we have concerns that the Blueprint fails to do so.

While the Cities Association of Santa Clara County Planning Collaborative endorses the Blueprint's guiding principles, we have a number of concerns about how the Blueprint will achieve the key goals of the Sustainable Communities Strategy (SCS) and requirements of SB 375, as well as the feasibility and practicality of implementing the PBA Blueprint in Santa Clara County as a whole as well as for its individual jurisdictions, as enumerated below:

- 1. Does not Achieve Key Goal of the Sustainable Communities Strategy.** The primary goal of the regional SCS per the requirements of SB 375 is to link household and employment growth to transit infrastructure and services to reduce VMT and GHG emissions. Unfortunately, the PBA 2050 falls short of this goal because it locates a large percentage of growth in areas that do not currently have excellent access to transit (i.e. Santa Clara County communities). Even with new investments in transit infrastructure in Santa Clara County by BART and VTA, the cities in Santa Clara County are not as well served by transit than cities such as San Francisco, Oakland and Berkeley. While the Cities Association maintains a strong commitment to investing in new transit facilities and related community development, we believe that it is a strategic mistake for the region to actively plan for a level of housing and employment growth in Santa Clara County that could not possibly be accommodated in transit and service rich neighborhoods during the PBA time frame.
- 2. Unrealistic Household and Employment Growth Targets for Santa Clara County.** The Draft Blueprint allocates 41% of the region's household growth and 44% of the region's employment growth to Santa Clara County. For Santa Clara County jurisdictions, this level of future growth is both unrealistic and unsustainable based on current and projected levels of infrastructure spending. Our local cities, school districts, transportation agencies, utility

providers, special districts, etc. are unable to provide the necessary services and infrastructure that would be required for this level of new development. Even with significant new infrastructure spending measures at the jurisdictional, sub-regional or regional levels, this level of growth would still likely be unrealistic within PBA time frame.

**3. Potential Impact of the Draft Blueprint assumptions on the Regional Housing Needs Allocation Housing Methodology.**

The RHNA Housing Methodology Committee will be making a recommendation to ABAG's Executive Board on whether RHNA for the region should be based on Plan Bay Area or existing households in addition to other demographic factors. The Cities Association does not recommend using the Plan Bay Area assumptions in the RHNA process for the following reasons:

- **Timing.** Public comment on the PBA Blueprint ends August 10, with the Final Blueprint scheduled for adoption in late 2020. Based on their existing schedule, the HMC won't have time to recommend adjustment or modification of the RHNA methodology based on the Final Blueprint.
- **Double-Counting of Factors.** Plan Bay Area is presumed to include some of the same inputs as the RHNA process, such as a focus on access to jobs. While these are important factors, they could be double counted through the RHNA process, especially since the HMC and jurisdictions' staffs have had less opportunity to review and understand the PBA model.
- **Locating Growth in the Regional Transit-Oriented, Jobs-Rich Core.** As noted above, several major cities in the region's transit-oriented, jobs-rich core, including San Francisco and Berkeley, would receive *less allocation than the regional average (16%)*. This seems to conflict with the PBA's goals of focusing growth near jobs, high-quality transit and existing infrastructure. This is especially problematic since most of the region's proposed transportation funding (approximately 75%) is scheduled for the maintenance and operation of existing transportation infrastructure.
- **Lack of Access to Transit.** The PBA options reveal a large percentage of projected growth within Santa Clara County cities. While as a whole Santa Clara County cities do have large parcels of underutilized land to accommodate additional growth, the area's transportation system is not well equipped to provide viable transportation options for new residents to help meet the Plan's GHG reduction targets. If these PBA options become part of the final RHNA determination, the Cities Association recommends that an equivalently proportional amount of transportation funding be allocated to Santa Clara County to support the transit improvements necessary to support this growth and reduce VMT and GHG emissions, per the goals of the SCS.
- **Unachievable Housing Targets.** Combining the PBA Baseline Option with some of the RHNA allocation factors already studied could create an extraordinary housing allocation for Santa Clara County jurisdictions to achieve within the eight-year time frame of the next Housing Element. In some instances, these increases could

represent a 30 to 50% increase over existing households. These are unrealistic assumptions which would not be achieved, especially considering that many of our jurisdictions have to largely rely on redevelopment of infill sites for housing growth.

The Cities Association of Santa Clara County Planning Collaborative wholly recognizes our regional responsibility to add housing to meet the current housing crisis and future growth needs. Many of our jurisdictions have already planned for significant housing growth by rezoning major employment and commercial areas and adopting policies mandating the development of housing supply in tandem with new jobs added to achieve a jobs-housing balance. However, the household and employment growth projected in the PBA Draft Blueprint would simply be unrealistic and at odds with the SCS stated goals of creating, affordable, connected, diverse, healthy and vibrant communities. We strongly recommend a recalibration of the PBA Blueprint employment and household projections for Santa Clara County to produce practical and implementable targets that are more consistent with the ability of our communities to grow sustainably over the next 30 years.

Sincerely,

A handwritten signature in blue ink, appearing to read "Larry Klein".

Larry Klein  
President, CASC  
Mayor, City of Sunnyvale

cc: Therese McMillan, Executive Director  
Bradford Paul, Deputy Executive Director, Local Government Services

## Fred Castro

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**From:** Campbell, Clare <clare.campbell@cityofpaloalto.org>  
**Sent:** Thursday, August 27, 2020 12:00 PM  
**To:** MTC-ABAG Info; Fred Castro; Regional Housing Need Allocation; rhna@TheCivicEdge.com  
**Cc:** Shikada, Ed; Lait, Jonathan; Tanner, Rachael; French, Amy  
**Subject:** Refining RHNA Methodology Concepts - Comment Letter - City of Palo Alto - August 28, 2020 Agenda Item 5a  
**Attachments:** Preferred Methodology 6 Cycle RHNA.docx.pdf

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### \*External Email\*

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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,



CITY OF  
**PALO  
ALTO**

### CLARE CAMPBELL

Manager of Long Range Planning  
Planning and Development Services

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OFFICE OF THE CITY MANAGER

250 Hamilton Avenue, 7th Floor  
Palo Alto, CA 94301  
650.329.2392

August 26, 2020

Housing Methodology Committee Members  
Submitted Via Email To: [info@bayareametro.gov](mailto:info@bayareametro.gov)

**RE: Preferred Methodology for 6<sup>th</sup> 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 13<sup>th</sup> 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.



[CityOfPaloAlto.org](http://CityOfPaloAlto.org)



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](mailto:RHNA@bayareametro.gov)

Fred Castro, Clerk of the Board, Association of Bay Area Governments,

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

[rhna@TheCivicEdge.com](mailto:rhna@TheCivicEdge.com)