Fred Castro

From:	Doyle-Stevens, Leah <leah.doyle-stevens@countyofnapa.org>
Sent:	Wednesday, September 2, 2020 11:26 AM
To:	Fred Castro
Cc:	Dillon, Diane; Franchi, Helene
Subject:	Re: Letter to ABAG Chair Jesse Arreguin
Attachments:	09012020_LtrtoMayorArreguin.pdf

My apologies, Fred! This letter pertains to THIS WEEK's HMC meeting.

Thank you,

Leah

Leah Doyle-Stevens
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Third Street, Suite 310 · Napa, CA 94559
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From: Doyle-Stevens, Leah
Sent: Wednesday, September 2, 2020 11:22 AM
To: Fred Castro <fcastro@bayareametro.gov>
Cc: Dillon, Diane <Diane.DILLON@countyofnapa.org>; Franchi, Helene <Helene.Franchi@countyofnapa.org>
Subject: Letter to ABAG Chair Jesse Arreguin

Hi Fred,

I hope this message finds you well. Please find attached, a joint letter from Napa County Supervisor Diane Dillon and City of Napa Community Development Director Vin Smith regarding the ABAG Regional Planning Committee meeting next week. Will you please ensure this letter reaches the desk of Chair Arreguin?

Many thanks in advance.

Kindly,

Leah

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September 1, 2020

Mayor Jesse Arreguin
Chair, Housing Methodology Committee
Association of Bay Area Governments
Bay Area Metro Center
375 Beale Street Suite 700
San Francisco, CA 94105

Dear Mayor Arreguin:

We write as the two representatives to the Housing Methodology Committee (HMC) from the county of Napa and its jurisdictions concerning the discussion at the HMC meeting last Friday. We hope you will accept the following comments as amplification/clarification of the remarks offered at the meeting. Given the fires in Napa County, it has taken awhile to organize our thoughts and we appreciate the opportunity to provide this follow-up.

Income Groupings. Like many others on the Committee, we see very little difference between the two approaches (i.e. grouping moderate housing with low/very low or keeping it grouped with above moderate housing). However, thinking about how we will have to communicate the methodology to our constituents, we wonder if we can strive to have one set of factors for all income groups similar to the approach reflected in Scenarios 3a and 3b on Table 1: Factors and Weights for Six Potential Methodologies (Item 5A, page 4). This is not to say that we prefer the factors used in 3a and 3b, but the simplicity of these scenarios is preferred.

Performance Evaluation Metrics. Only Objective 2 on Table 3: Revised Set of Proposed Evaluation Metrics (Item 5A, page 7), with its two performance metrics, addresses the physical form of our region, and how we see new housing relating to existing land use patterns and transportation systems. While we recognize that the suite of proposed objectives and performance metrics is drawn from statute, the GHG reduction mandate of Plan Bay Area is also key, and we wonder if there's a way to better balance or integrate performance metrics that address land use and transportation with those that address fairness and equity? Certainly fairness and equity need to be addressed, but so do sustainable development patterns that put new housing in urbanized areas close to transit.   We need to be successful at both!

Factors and Scenarios. Regarding Table 1 and the six methodologies you asked us to test, we like Scenario 1a, with its emphasis on jobs and job growth, but we also like the simplicity of 3a

and 3b, because all income categories use the same factors in different emphasis. Our bottom line, however, is that *none of the six options presented are successful in balancing all of our region's challenges*, and we would like other factors to be included in the final methodology.

Specifically, we would like to see a final methodology that includes either the factor of "Urbanized Land Area" or "Natural Hazards." We believe it is in all of our best interests to see housing development occur within urbanized areas and outside of areas that will increasingly experience catastrophic events like the fires of these past weeks. For example, we would support an option where all income categories use the following factors: 50% Access to High Opportunity Areas; 30% Jobs Proximity – Transit; and 20% Natural Hazards. (These percentages could change for above moderate income units.)

Use of these factors would support housing growth outside of areas prone to natural hazards and would also address both our need to increase access to high paying jobs for all households and our need to prioritize housing close to transit.

Thank you for your consideration of these thoughts. We look forward to further discussions at the next Committee meeting and hope the agenda will prioritize discussion of the factors and methodology. We still have much work to do!

Sincerely,
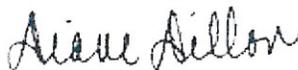
Diane Dillon
Napa County Supervisor, District 3

Vin Smith
Community Development Director
City of Napa

cc: County of Napa
        City of Napa

From:	Fernando Marti <fernando@sfic-409.org>
Sent:	Monday, August 31, 2020 2:02 PM
To:	Daniel Saver; Dave Vautin; Eli Kaplan; Gillian Adams; Aksel Olsen; lskjerping@cityofberkeley.info; mayor@cityofberkeley.info; rhna@thecivicedge.com; Rodney Nickens Jr; Carlos Romero; Jeffrey Levin; Fred Castro
Subject:	Proposed Amendments to RHNA Evaluative Criteria Metric 5b
Attachments:	AFFH Eval Criteria Proposal_8.31.20.pdf; AFFH Eval Criteria Proposal Data.xlsx

Dear ABAG Staff and Consultants,

As members of the Regional Housing Needs Allocation (RHNA) Housing Methodology Committee (HMC), we want to thank you for moving us forward on this complex process.

As requested by staff at the August 28 HMC meeting, and following from the analysis in our letter to the HMC dated August 25, we are attaching a proposal to amend the Affirmatively Furthering Fair Housing (AFFH) evaluative criteria 5b.

We believe the AFFH evaluative metric 5b presented at the August 28 HMC meeting does not sufficiently identify areas of long-standing racial and socioeconomic exclusion nor does it ensure these jurisdictions receive appropriate and equitable allocations. We propose adjusting Metric 5b to more accurately capture the extent of exclusion in the region and ensure exclusionary jurisdictions are allocated their fair share.

We would appreciate it if this letter can be shared with all HMC members and the public, so that the HMC has the opportunity to discuss and decide on the evaluation metrics and their application, prior to making a final decision on the criteria as a whole or on the methodology formula itself.

Thank you,

Fernando Martí, Carlos Romero, Jeff Levin, and Rodney Nickens Jr. (HMC members)

(note we may have additional signatories coming tonight)

Fernando Martí, *Co-Director*
Council of Community Housing Organizations

CCHO Action
Celebrating 40 years as the voice of San Francisco's affordable housing movement
325 Clementina Street, San Francisco 94103

415-882-0901 office

415-595-5558 cell

NOTE I am generally not in the office on Fridays.
Pronouns: he, him

www.sfccho.org
www.sfcchoaction.org
Follow us on Twitter and Facebook!

Check back here for updates on Affordable Housing Week 2020.

August 31, 2020

Dear ABAG Staff and Consultants,

Thank you for the opportunity to present our proposal to amend the AFFH evaluative criteria before the HMC votes on the criteria as a whole.

While we appreciate that there is no perfect metric to reflect the complex, intersectional exclusion that AFFH seeks to overcome, the AFFH evaluative metrics presented at the August 28 HMC meeting, specifically Metric 5b, does not sufficiently identify areas of long-standing racial and socioeconomic exclusion nor does it ensure these jurisdictions receive appropriate and equitable allocations that affirmatively further fair housing in a meaningful way.

- **The proposed approach dramatically under-identifies areas of exclusion** across the region, only reflecting an estimated **14 percent** of the region's households.[1] This is much lower than the actual prevalence of exclusionary jurisdictions. Existing research has demonstrated that over 40 percent of Bay Area residents live in cities that are racially and economically exclusive.[2]

- **The proposed approach does not account for the intersectional exclusion we see across the region nor does it propose sufficient remedy to ensure AFFH.** We need a metric that sufficiently accounts for segregation and exclusion. Many of us, as well as other members of the HMC, have continued to raise this point throughout the HMC process.

- **The proposed approach does not capture the primary way in which cities have excluded low-income communities of color: single-family zoning.** Our approach focuses specifically on jurisdictions' allocations for very low and low income, because those allocations require zoning for multi-family housing, while allocations of moderate and above-moderate income can be met solely with single-family zoning.

We propose adjusting Metric 5b to more accurately capture the extent of exclusion in the region and ensure exclusionary jurisdictions are allocated their fair share. Our equity-oriented proposal is as follows:

> *Do jurisdictions with levels of racial and socioeconomic exclusion above the regional average receive a share of the region's very low- and low-income housing need that is at least proportional to their share of the region's households?*

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[1] A total of 34 jurisdictions have 100% of their population living in high or highest resource tracts. We assume that of these 34, the 25 with the highest proportion of their population in highest resource tracts would be selected, which account for about 8 percent of the region's households.

[2] A report by the Othering & Belonging Institute this month and report by the Terner Center last year found that a city's percent of single-family zoning correlates very highly with its level of racial segregation. The research shows that "rolling back this restrictive type of zoning can ease segregation and make integration more feasible." About **46.4%** of the Bay Area's residents live in cities whose residential lands are 75% or more zoned for single-family homes only.

Measure: For jurisdictions with levels of racial and socioeconomic exclusion above the regional average (using a composite measure of the divergence index and the percentage of households above 120% of the area median income, excluding segregated low-income areas), ensure proportionality between the ratio of each of their shares of the region's total very low- and low-income RHNA to each of their shares of the region's total households.

We propose adjusting Metric 5b to better reflect patterns of exclusion across the region. Our recommended approach has two steps:

1. **Identify Exclusionary Jurisdictions Through a Composite Score**

Divergence Index Score (0-1)	+	% of Households above 120% AMI (0-1)	=	Composite Score
(Measure of Racial Exclusion)		*(Measure of Socioeconomic Exclusion)*		

   A composite score that takes into account both racial exclusion (divergence index) and socioeconomic exclusion (percent of above moderate-income households) allows us to best capture the interconnected forms of exclusion of protected classes that AFFH seeks to remediate.[3] Jurisdictions are considered exclusionary if their composite score is above the regional median composite score. Jurisdictions in the bottom quartile for median income are filtered out to ensure that the RHNA does not concentrate allocations in places of segregation of low-income households, such as East Palo Alto, which has a high divergence score but is an area of segregation, rather than exclusion.

2. **Ensure Each Exclusionary Jurisdiction is Allocated its Fair Share of the Region's Very Low and Low-Income Allocations -- <u>at least proportional</u> to its share of the region's total households in 2019.**

   The final allocations to exclusionary jurisdictions must be adjusted so that, notwithstanding other factors, individual allocations reflect this proportionality. For example, Cupertino has about 0.8% of the region's households, therefore its very low- and low-income allocations must be at least 0.8% of the region's total very low- and low-income allocations.

This equity-oriented proposal performs significantly better than the current staff proposal at reflecting the scope of segregation in the region -- 23 versus 14 percent of total households. Our proposal identifies 17 additional jurisdictions with high levels of exclusion, including Sunnyvale, Menlo Park, Millbrae, and Palo Alto. While this proposal does not reflect the full scope of

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[3] "A key purpose of the Fair Housing Act is to create open residential communities in which individuals may choose where they prefer to live without regard to race, color, national origin, disability, and other characteristics protected by the Act... The purpose...is to help identify potential fair housing related issues, including **factors that limit or deny individuals or groups with a full range of housing options and choices on the basis of being in a protected class…**" AFFH Rule, p. 42279-80.

exclusionary jurisdictions, we feel this is a strong compromise that better reflects exclusion across the region.

Approach	Jurisdictions Captured	Percent of Households
Current Staff Proposal: Metric 5b	30	14%
Proposed Equity-Oriented Approach	47	23%

Please see the attached spreadsheet to explore the full data we used for this analysis.

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

Signed,

Jeffrey Levin
Fernando Marti
Rodney Nickens, Jr.
Carlos Romero

county	Jurisdiction	Bay Area Households, Excluding Unincorporated Areas	% of Bay Area Households, Excluding Unincorporated Areas	% of Population Living in High or Highest Resource Tracts	divergence	hhs_above_120pct_AMI	Composite (divergence + hhs above 120pct AMI)	Quartile of Median Household Income 2018	Staff Proposal Metric 5b	Proposed Equity-Oriented Approach
San Mateo	Atherton	2,221	0.09%	38%	0.245607342	0.820801441	1.066408783	Upper Three-Quarters	YES	YES
Marin	Belvedere	916	0.04%	100%	0.611462986	0.708515284	1.31997827	Upper Three-Quarters	YES	YES
Contra Costa	Clayton	4,200	0.17%	100%	0.286862978	0.691428571	0.978291549	Upper Three-Quarters	YES	YES
Marin	Corte Madera	3,893	0.16%	100%	0.360395328	0.665296686	1.025692014	Upper Three-Quarters	YES	YES
Santa Clara	Cupertino	20,657	0.84%	100%	0.432184504	0.699908021	1.132092525	Upper Three-Quarters	YES	YES
Contra Costa	Danville	15,956	0.65%	100%	0.297876808	0.693908248	0.991785056	Upper Three-Quarters	YES	YES
Marin	Fairfax	3,390	0.14%	100%	0.409229664	0.536283186	0.94551285	Upper Three-Quarters	YES	YES
Alameda	Fremont	74,445	3.03%	80%	0.243374533	0.627134126	0.870508659	Upper Three-Quarters	YES	YES
San Mateo	Half Moon Bay	4,715	0.19%	N/A	0.206657727	0.561611877	0.768269604	Upper Three-Quarters	YES	YES
Contra Costa	Hercules	8,098	0.33%	0%	0.207918944	0.571005186	0.77892413	Upper Three-Quarters	YES	YES
San Mateo	Hillsborough	3,664	0.15%	100%	0.198030626	0.846888646	1.044919272	Upper Three-Quarters	YES	YES
Contra Costa	Lafayette	9,407	0.38%	100%	0.274430048	0.661103434	0.935533482	Upper Three-Quarters	YES	YES
Santa Clara	Los Altos	10,585	0.43%	100%	0.2134379	0.767028814	0.980466714	Upper Three-Quarters	YES	YES
Santa Clara	Los Altos Hills	3,053	0.12%	100%	0.215373772	0.837209302	1.052583074	Upper Three-Quarters	YES	YES
Santa Clara	Los Gatos	12,108	0.49%	100%	0.225089373	0.617195243	0.842284616	Upper Three-Quarters	YES	YES
Marin	Mill Valley	8,044	0.33%	100%	0.455462767	0.659102121	1.114564888	Upper Three-Quarters	YES	YES
Santa Clara	Milpitas	22,637	0.92%	64%	0.397040453	0.599858639	0.996899092	Upper Three-Quarters	YES	YES
Santa Clara	Monte Sereno	1,139	0.05%	100%	0.278475185	0.811237928	1.089713113	Upper Three-Quarters	YES	YES
Contra Costa	Moraga	5,909	0.24%	100%	0.219935009	0.667287189	0.887222198	Upper Three-Quarters	YES	YES
Contra Costa	Orinda	7,093	0.29%	100%	0.259602973	0.761313972	1.020916945	Upper Three-Quarters	YES	YES
Alameda	Piedmont	3,948	0.16%	100%	0.274989453	0.798632219	1.073621672	Upper Three-Quarters	YES	YES
San Mateo	Portola Valley	1,744	0.07%	100%	0.386725205	0.735091743	1.121816948	Upper Three-Quarters	YES	YES
Marin	Ross	807	0.03%	100%	0.607145163	0.764560099	1.371705262	Upper Three-Quarters	YES	YES
Napa	Saint Helena	2,600	0.11%	N/A	0.338425918	0.400769231	0.739195149	Upper Three-Quarters	YES	YES
Santa Clara	Saratoga	10,950	0.45%	100%	0.266899342	0.710319635	0.977218977	Upper Three-Quarters	YES	YES
Marin	Tiburon	3,817	0.16%	100%	0.447483195	0.674613571	1.122096766	Upper Three-Quarters	YES	YES
Alameda	Union City	21,484	0.87%	14%	0.233043034	0.524762614	0.757805648	Upper Three-Quarters	YES	YES
San Mateo	Woodside	1,899	0.08%	100%	0.381928115	0.754081095	1.13600921	Upper Three-Quarters	YES	YES
San Mateo	Belmont	10,328	0.42%	100%	0.103930869	0.627033308	0.730964177	Upper Three-Quarters	NO	YES
San Mateo	Daly City	31,620	1.29%	32%	0.272833198	0.445034788	0.717867986	Upper Three-Quarters	NO	YES
Alameda	Dublin	19,637	0.80%	100%	0.110411725	0.704893823	0.815305548	Upper Three-Quarters	NO	YES
San Mateo	Foster City	12,600	0.51%	100%	0.150214456	0.702142857	0.852357313	Upper Three-Quarters	NO	YES
Santa Clara	Gilroy	16,208	0.66%	16%	0.310293546	0.479207799	0.789501345	Upper Three-Quarters	NO	YES
Sonoma	Healdsburg	4,666	0.19%	N/A	0.346295668	0.453707673	0.800003341	Upper Three-Quarters	NO	YES
Marin	Larkspur	5,895	0.24%	100%	0.399126546	0.514164546	0.913291092	Upper Three-Quarters	NO	YES
Alameda	Livermore	31,534	1.28%	36%	0.133000347	0.579406355	0.712406702	Upper Three-Quarters	NO	YES
San Mateo	Menlo Park	11,936	0.49%	83%	0.092792234	0.62525134	0.718043574	Upper Three-Quarters	NO	YES
San Mateo	Millbrae	6,081	0.25%	100%	0.148025587	0.576951765	0.724977352	Upper Three-Quarters	NO	YES
Santa Clara	Palo Alto	26,212	1.07%	100%	0.154458504	0.649473524	0.803932028	Upper Three-Quarters	NO	YES
Contra Costa	Pleasant Hill	13,679	0.56%	71%	0.148580445	0.550040208	0.698620653	Upper Three-Quarters	NO	YES
Alameda	Pleasanton	28,498	1.16%	100%	0.098255399	0.674398203	0.772653602	Upper Three-Quarters	NO	YES
Marin	San Anselmo	5,293	0.22%	100%	0.500529588	0.609862082	1.11039167	Upper Three-Quarters	NO	YES
San Mateo	San Carlos	11,327	0.46%	94%	0.212485454	0.685706718	0.898192172	Upper Three-Quarters	NO	YES
Contra Costa	San Ramon	25,150	1.02%	100%	0.150823745	0.695705765	0.84652951	Upper Three-Quarters	NO	YES
Marin	Sausalito	4,065	0.17%	100%	0.493908222	0.570233702	1.064141924	Upper Three-Quarters	NO	YES
Santa Clara	Sunnyvale	55,938	2.27%	66%	0.100942062	0.618005649	0.718947711	Upper Three-Quarters	NO	YES
Sonoma	Windsor	9,295	0.38%	N/A	0.263916119	0.499515869	0.763431988	Upper Three-Quarters	NO	YES
San Mateo	San Bruno	14,810	0.60%	44%	0.045518964	0.510668467	0.556187431	Upper Three-Quarters	YES	NO
Sonoma	Santa Rosa	66,629	2.71%	6%	0.172694294	0.327214876	0.49990917	Bottom Quarter	YES	NO
Alameda	Alameda	30,365	1.23%	73%	0.046808138	0.490400132	0.53720827	Upper Three-Quarters	NO	NO
Alameda	Albany	7,391	0.30%	83%	0.064831381	0.444324178	0.509155559	Upper Three-Quarters	NO	NO
Napa	American Canyon	5,442	0.22%	0%	0.064523705	0.488790886	0.553314591	Upper Three-Quarters	NO	NO
Contra Costa	Antioch	34,102	1.39%	0%	0.193103805	0.346871151	0.539974956	Bottom Quarter	NO	NO
Solano	Benicia	11,130	0.45%	54%	0.144969397	0.490925427	0.635894824	Upper Three-Quarters	NO	NO

County	City	Population	Percent	Share	Value1	Value2	Value3	Quartile	Flag1	Flag2
Alameda	Berkeley	44,978	1.83%	69%	0.074612095	0.439125795	0.51373789	Bottom Quarter	NO	NO
Contra Costa	Brentwood	19,543	0.79%	0%	0.084248395	0.521772502	0.606020897	Upper Three-Quarters	NO	NO
San Mateo	Brisbane	1,836	0.07%	0%	0.009186141	0.535947712	0.545133853	Upper Three-Quarters	NO	NO
San Mateo	Burlingame	12,029	0.49%	100%	0.082337017	0.594978801	0.677315818	Upper Three-Quarters	NO	NO
Napa	Calistoga	2,082	0.08%	N/A		0.280086925	0.321805956	0.601892881	Bottom Quarter	NO	NO
Santa Clara	Campbell	16,510	0.67%	57%	0.041066951	0.571774682	0.612841633	Upper Three-Quarters	NO	NO
Sonoma	Cloverdale	3,144	0.13%	N/A		0.22828495	0.336195929	0.564480879	Bottom Quarter	NO	NO
San Mateo	Colma	477	0.02%	0%	0.089992545	0.469601677	0.559594222	Upper Three-Quarters	NO	NO
Contra Costa	Concord	46,475	1.89%	9%	0.073837798	0.39690156	0.470739358	Bottom Quarter	NO	NO
Sonoma	Cotati	2,824	0.11%	0%	0.295412046	0.341005666	0.636417712	Upper Three-Quarters	NO	NO
Solano	Dixon	6,015	0.24%	N/A		0.213451805	0.334995844	0.548447649	Bottom Quarter	NO	NO
San Mateo	East Palo Alto	7,478	0.30%	0%	0.45233077	0.3369885	0.78931927	Bottom Quarter	NO	NO
Contra Costa	El Cerrito	9,987	0.41%	36%	0.059147312	0.501451887	0.560599199	Upper Three-Quarters	NO	NO
Alameda	Emeryville	6,456	0.26%	0%	0.083553223	0.505421314	0.588974537	Upper Three-Quarters	NO	NO
Solano	Fairfield	36,348	1.48%	0%	0.074013191	0.391355783	0.465368974	Bottom Quarter	NO	NO
Alameda	Hayward	47,768	1.94%	0%	0.147192408	0.382892313	0.530084721	Bottom Quarter	NO	NO
Contra Costa	Martinez	14,668	0.60%	12%	0.160637552	0.5164985	0.677136052	Upper Three-Quarters	NO	NO
Santa Clara	Morgan Hill	14,670	0.60%	0%	0.097173209	0.560190866	0.657364075	Upper Three-Quarters	NO	NO
Santa Clara	Mountain View	33,707	1.37%	75%	0.037505861	0.609309639	0.6468155	Upper Three-Quarters	NO	NO
Napa	Napa	28,457	1.16%	0%	0.271028287	0.393014021	0.664042308	Bottom Quarter	NO	NO
Alameda	Newark	13,677	0.56%	9%	0.061133119	0.547269138	0.608402257	Upper Three-Quarters	NO	NO
Marin	Novato	22,077	0.90%	46%	0.183598265	0.482040132	0.665638397	Upper Three-Quarters	NO	NO
Alameda	Oakland	161,483	6.57%	10%	0.188968252	0.351863664	0.540831916	Bottom Quarter	NO	NO
Contra Costa	Oakley	11,812	0.48%	0%	0.143185819	0.482983407	0.626169226	Upper Three-Quarters	NO	NO
San Mateo	Pacifica	13,954	0.57%	100%	0.04912596	0.572667336	0.621793296	Upper Three-Quarters	NO	NO
Sonoma	Petaluma	22,505	0.92%	15%	0.259079062	0.434525661	0.693604723	Upper Three-Quarters	NO	NO
Contra Costa	Pinole	6,669	0.27%	0%	0.028641941	0.457189984	0.485831925	Upper Three-Quarters	NO	NO
Contra Costa	Pittsburg	20,958	0.85%	0%	0.215769748	0.324506155	0.540275903	Bottom Quarter	NO	NO
San Mateo	Redwood City	30,157	1.23%	50%	0.084336109	0.543356435	0.627692544	Upper Three-Quarters	NO	NO
Contra Costa	Richmond	37,209	1.51%	0%	0.248214681	0.286624204	0.534838885	Bottom Quarter	NO	NO
Solano	Rio Vista	4,286	0.17%	N/A		0.307422487	0.300513299	0.607935786	Bottom Quarter	NO	NO
Sonoma	Rohnert Park	15,969	0.65%	0%	0.180181209	0.277036759	0.457217968	Bottom Quarter	NO	NO
San Francisco	San Francisco	359,673	14.62%	53%	0.028688551	0.517286535	0.545975086	Upper Three-Quarters	NO	NO
Santa Clara	San Jose	321,835	13.09%	26%	0.065927422	0.51912626	0.585053682	Upper Three-Quarters	NO	NO
Alameda	San Leandro	31,727	1.29%	0%	0.070155871	0.3613011	0.431456971	Bottom Quarter	NO	NO
San Mateo	San Mateo	38,583	1.57%	51%	0.020896566	0.558743488	0.579640054	Upper Three-Quarters	NO	NO
Contra Costa	San Pablo	9,136	0.37%	0%	0.434242937	0.161120841	0.595363778	Bottom Quarter	NO	NO
Marin	San Rafael	22,982	0.93%	29%	0.175003316	0.461839701	0.636843017	Upper Three-Quarters	NO	NO
Santa Clara	Santa Clara	44,079	1.79%	42%	0.060199507	0.570362304	0.630561811	Upper Three-Quarters	NO	NO
Sonoma	Sebastopol	3,263	0.13%	N/A		0.371900088	0.366533865	0.738433953	Bottom Quarter	NO	NO
Sonoma	Sonoma	5,006	0.20%	N/A		0.377688638	0.389932082	0.76762072	Bottom Quarter	NO	NO
San Mateo	South San Francisco	21,083	0.86%	54%	0.131964125	0.483754684	0.615718809	Upper Three-Quarters	NO	NO
Solano	Suisun City	9,318	0.38%	0%	0.133637854	0.367353509	0.500991363	Bottom Quarter	NO	NO
Solano	Vacaville	32,922	1.34%	0%	0.114331974	0.392959115	0.507291089	Bottom Quarter	NO	NO
Solano	Vallejo	41,991	1.71%	0%	0.147904467	0.297635208	0.445539675	Bottom Quarter	NO	NO
Contra Costa	Walnut Creek	31,105	1.26%	100%	0.191077604	0.489728339	0.680805943	Upper Three-Quarters	NO	NO
Napa	Yountville	1,368	0.06%	N/A		0.396146779	0.328216374	0.724363153	Bottom Quarter	NO	NO

Fred Castro

From:	Pappas, James (CPC) <james.pappas@sfgov.org>
Sent:	Wednesday, September 2, 2020 4:25 PM
To:	Eli Kaplan; Fred Castro
Cc:	Gillian Adams
Subject:	Re: Expressing support for RHNA allocation Option 3 and for alternative proposal for AFFH evaluative criteria

Yes I am fine with my comments going to my HMC colleagues and into the public record. I'm copying Fred here.

Thanks for checking-

James

From: Eli Kaplan <ekaplan@bayareametro.gov>
Date: Wednesday, September 2, 2020 at 4:20 PM
To: "Pappas, James (CPC)" <james.pappas@sfgov.org>
Subject: RE: Expressing support for RHNA allocation Option 3 and for alternative proposal for AFFH evaluative criteria

Hello James,

Thank you for sharing your thoughts with us. Would you like me to forward this message to Fred Castro for distribution to the HMC and inclusion in the public record for the HMC meeting on Friday 9/4? No worries if you only wanted to share these thoughts with staff, but I wanted to check in case you wanted them sent to others as well.

Best,
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: Pappas, James (CPC) <james.pappas@sfgov.org>
Sent: Wednesday, September 2, 2020 4:12 PM
To: Gillian Adams <gadams@bayareametro.gov>

Cc: Aksel Olsen <aolsen@bayareametro.gov>; Dave Vautin <DVautin@bayareametro.gov>; Eli Kaplan <ekaplan@bayareametro.gov>
Subject: Expressing support for RHNA allocation Option 3 and for alternative proposal for AFFH evaluative criteria

Dear Gillian and colleagues-

After reflection over the last week I am writing to express my support for RHNA allocation Option 3 presented during our last Methodology Committee meeting as well as to support the proposal submitted by a group of Committee members for an alternative to the evaluative criteria for Affirmatively Furthering Fair Housing (AFFH).

Option 3 seems to me to offer the clearest and most effective means to target the region's most pressing housing problems: equitable access to high opportunity areas and the need for housing close to jobs. This option also has the benefit of being easy to explain to the public and policy makers. In addition, I believe that this option addresses the need for the RHNA methodology to help achieve the region's VMT and GHG reduction goals by placing the bulk of housing growth in cities close to jobs and typically well-served by transit. Furthermore, the use of the 2050 Plan Bay Area household distribution as the baseline reflects the policies supporting infill development and reduced GHG and VMT already in the Plan. Regarding concerns about natural hazards, I think Option 3 would also minimize risks associated with natural hazards by encouraging more compact growth, though the onus remains on cities to appropriately plan for housing development in areas less at risk to those hazards.

At the last meeting I heard some desire from Committee members to include job proximity via auto or transit in the methodology. To address this issue, I would suggest the possibility of a modification to Option 3 to include three factors as follows:

- Job Proximity- Transit for Very Low and Low income household allocation and
- Job Proximity- Auto for the Moderate and Above Moderate allocation.
- For example in Option 3, VLI and Low income could be distributed 70% to Access to High Opportunity areas, 20% based on Job-Housing Fit, and 10% on Job Proximity- Transit. Moderate and Above Moderate could shift to 40% Access to High Opportunity, 40% Jobs-Housing balance, and 20% Job Proximity- Auto.
- I am neutral on how moderate income units are allocated, however, given that jobs housing fit relates specifically to lower wage jobs it made more sense to me to group moderate income with above moderate income units in relation to the factors in this option.

The logic for these suggestions is that access to opportunity and job access remain key considerations but that transit access is particularly key for lower income residents and auto proximity to jobs is relevant for all households of all incomes, but particularly moderate and above moderate income households.

Lastly I would like to express my support for the proposal for an alternative to the AFFH evaluative criteria submitted by Fernando Martí, Carlos Romero, Jeff Levin, and Rodney Nickens Jr. in their email sent Monday 8/31/20. Specifically their proposal is to (1) Identify Exclusionary Jurisdictions Through a Composite Score, and (2) Ensure Each Exclusionary Jurisdiction is Allocated its Fair Share of the Region's Very Low and Low-Income Allocations. This proposal is an alternative to metric 5b in the evaluative criteria presented at our last Methodology Committee meeting on 8/28. The proposal will help to ensure that the Methodology Committee, Regional Planning Committee, and ABAG Executive Committee have a clearer understanding of the performance of different RHNA approaches in relation to AFFH and ensure that more of the region's cities that exhibit exclusionary housing characteristics do more to provide equitable housing opportunities.

I want to state that I write as a planner for San Francisco expressing my professional opinion as a member of the Methodology Committee but I am not expressing an official policy position of the City and County of San Francisco. I look forward to continuing the conversation with colleagues on the Methodology Committee and staff this Friday.

Thank you for your ongoing work on the methodology process-

James

James Pappas, Senior Policy Planner
Citywide Planning Division
San Francisco Planning
<mark>PLEASE NOTE MY NEW ADDRESS AND PHONE NUMBER AS OF AUGUST 17:</mark>
49 South Van Ness Avenue, Suite 1400, San Francisco, CA 94103
Direct: 628.652.7470| www.sfplanning.org
San Francisco Property Information Map

IN ORDER FOR US TO MOVE, OUR OFFICE WILL BE CLOSED WITH NO ACCESS TO PHONES OR E-MAIL ON THURSDAY, AUGUST 13 and FRIDAY, AUGUST 14. WE APPRECIATE YOUR PATIENCE.

Due to COVID-19, San Francisco Planning is not providing any in-person services, but we are operating remotely. Our staff are available by e-mail, and the Planning and Historic Preservation Commissions are convening remotely. The public is encouraged to participate. Find more information on our services here.