



375 Beale Street  
Suite 700  
San Francisco, California  
94105

## Meeting Agenda - Final

### ABAG Executive Board

*President, Jesse Arreguin, Mayor, City of Berkeley*  
*Vice President, Belia Ramos, Supervisor, County of Napa*  
*Immediate Past President, David Rabbitt, Supervisor, County of Sonoma*

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Thursday, December 17, 2020

5:05 PM

Board Room - 1st Floor (REMOTE)

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**Association of Bay Area Governments  
Executive Board Meeting No. 454  
Special Meeting**

The ABAG Executive Board will be meeting on December 17, 2020, 5:05 p.m., in the Bay Area Metro Center (Remotely). In light of Governor Newsom's State of Emergency declaration regarding the COVID-19 outbreak and in accordance with Executive Order N-29-20 issued by Governor Newsom on March 17, 2020 and the Guidance for Gatherings issued by the California Department of Public Health, the meeting will be conducted via webcast, teleconference, and Zoom for committee, commission, or board members who will participate in the meeting from individual remote locations.

A Zoom panelist link for meeting participants will be sent separately to committee, commission, or board members.

The meeting webcast will be available at: <https://abag.ca.gov/meetings-events/live-webcasts>

Members of the public are encouraged to participate remotely via Zoom at the following link or phone number:

Please click the link below to join the webinar:

<https://bayareametro.zoom.us/j/87313792365>

Or iPhone one-tap :

US: +16699006833,,87313792365# or +14086380968,,87313792365#

Or Telephone:

Dial(for higher quality, dial a number based on your current location):

US: +1 669 900 6833 or +1 408 638 0968 or +1 346 248 7799 or +1 253 215 8782 or +1 301 715 8592 or +1 312 626 6799 or +1 646 876 9923 or 888 788 0099 (Toll Free) or 877 853 5247 (Toll Free)

Webinar ID: 873 1379 2365

Detailed instructions on participating via Zoom are available at:

<https://abag.ca.gov/zoom-information>

Committee members and members of the public participating by Zoom wishing to speak should use the "raise hand" feature or dial "\*9".

In order to get the full Zoom experience, please make sure your application is up to date.

Members of the public may participate by phone or Zoom or may submit comments by email at [info@bayareametro.gov](mailto:info@bayareametro.gov) by 5:00 p.m. the day before the scheduled meeting date. Please include the committee or board meeting name in the subject line. Due to the current circumstances there may be limited opportunity to address comments during the meeting. All comments received will be submitted into the record.

The ABAG Executive Board may act on any item on the agenda.

The meeting is scheduled to begin at 5:05 p.m.

Agenda, roster and webcast available at <https://abag.ca.gov>

For information, contact Clerk of the Board at (415) 820-7913.

#### Roster

Candace Andersen, Jesse Arreguin, London Breed, Cindy Chavez, Christopher Clark, David Cortese, Lan Diep, Pat Eklund, Maya Esparza, Nikki Fortunato Bas, [Richard Garbarino,] Leon Garcia, Liz Gibbons, [Lynette Gibson McElhaney,] [Scott Haggerty,] Barbara Halliday, Erin Hannigan, Rich Hillis, David Hudson, [Wayne Lee,] [Jake Mackenzie,] Rafael Mandelman, Gordon Mar, Nathan Miley, Karen Mitchoff, Raul Perez, [Julie Pierce,] Dave Pine, David Rabbitt, Belia Ramos, Dennis Rodoni, Warren Slocum, Loren Taylor, Lori Wilson.

Jayne Battey (Non-voting).

### 1. Call to Order / Roll Call / Confirm Quorum

### 2. Public Comment

*Information*

### 3. Executive Board Announcements

*Information*

### 4. President's Report

4.a. [20-1615](#) ABAG President's Report for December 17, 2020

Action: Information

Presenter: Jesse Arreguin

### 5. Executive Director's Report

5.a. [20-1616](#) Executive Director's Report for December 17, 2020

Action: Information

Presenter: Therese W. McMillan

Attachments: [ED Report- ABAG December 2020.pdf](#)

### 6. Executive Board Consent Calendar

- 6.a. [20-1617](#) Approval of ABAG Executive Board Minutes of November 19, 2020
- Action: Approval
- Presenter: Clerk of the Board
- Attachments: [Item 06a Minutes 20201119 453 Draft.pdf](#)
- 6.b. [21-0011](#) Adoption of Resolution No. 16-2020, Second Revised - Plan Bay Area 2050 - Final Blueprint Strategies, Final Blueprint Growth Geographies, and Regional Growth Forecast, Revised
- Action: Approval
- Presenter: Dave Vautin
- Attachments: [Item 06b 1 Summary Sheet PBA50 Final Blueprint Concurrence Resolution 16 2](#)  
[Item 06b 2 Resolution PBA50 Final Blueprint Concurrence Resolution 16 2020 f](#)  
[Item 06b 3 Strategies Excerpt PBA50 Final Blueprint Concurrence Resolution 1](#)
- 6.c. [21-0049](#) Authorization to accept funding from Bay Area Toll Authority in the amount of \$660,000 and to amend an existing contract with Ghilotti Bros, Inc. in an amount of up to \$660,000 for the San Pablo Avenue Green Stormwater Spine Project
- Action: Approval
- Presenter: Caitlin Sweeney
- Attachments: [Item 06c 1 Summary Sheet SFEP GBI BATA.pdf](#)  
[Item 06c 2 Summary Approval SFEP GBI.pdf](#)
- 6.d. [21-0115](#) Ratification of Appointments to Housing Committee and Other Committees
- Action: Approval
- Presenter: Jesse Arreguin
- Attachments: [Item 06d Summary Sheet Committee Appointments.pdf](#)

## 7. ABAG Administrative Committee

- 7.a. [20-1618](#) Report on ABAG Administrative Committee Meeting of December 11, 2020
- Action: Information
- Presenter: Jesse Arreguin

## 8. Joint MTC ABAG Legislation Committee

- 8.a. [20-1619](#) Report on Joint MTC ABAG Legislation Committee Meeting of December 11, 2020
- Action: Information
- Presenter: Jesse Arreguin

**8.b. [21-0012](#)** Proposed Final 2021 Joint Advocacy Program

Proposed Final 2021 Joint Advocacy Program for MTC and ABAG, expressing the agencies' state and federal legislative priorities.

**Action:** Approval

**Presenter:** Rebecca Long and Randy Rentschler

**Attachments:** [Item 08b 1 Summary Sheet Joint Advocacy Program.pdf](#)  
[Item 08b 2 Attachment A Joint Legislation Cmte Final Advocacy Program Summr](#)  
[Item 08b 3 Attachment B Proposed 2021 Final Advocacy Program 12.11.20.pdf](#)

**9. Regional Housing Needs Allocation****9.a. [20-1693](#)** RHNA Update in Advance of January 2021 Draft Methodology and Subregional Shares Action Items

Presentation highlighting comments received during the RHNA public comment period in October and November and spotlighting how potential RHNA allocations would change with data updates between the Plan Bay Area 2050 Draft Blueprint and Final Blueprint.

**Action:** Information

**Presenter:** Gillian Adams

**Attachments:** [Item 09a 1 Summary Sheet RHNA Update.pdf](#)  
[Item 09a 2 Attachment A RHNA Public Comment Summary.pdf](#)  
[Item 09a 3 Attachment B Reporter's Transcript of Proceedings Certified.pdf](#)  
[Item 09a 4 Attachment C Comments from Local Jurisdictions C.pdf](#)  
[Item 09a 5 Attachment D Comments from Individuals and Stakeholders C.pdf](#)  
[Item 09a 6 Attachment E RHNA Update Presentation.pdf](#)

**10. Adjournment / Next Meeting**

*The next regular meeting of the ABAG Executive Board is on January 21, 2021.*



**Public Comment:** The public is encouraged to comment on agenda items at Committee meetings by completing a request-to-speak card (available from staff) and passing it to the Committee secretary. Public comment may be limited by any of the procedures set forth in Section 3.09 of MTC's Procedures Manual (Resolution No. 1058, Revised) if, in the chair's judgment, it is necessary to maintain the orderly flow of business.

**Meeting Conduct:** If this meeting is willfully interrupted or disrupted by one or more persons rendering orderly conduct of the meeting unfeasible, the Chair may order the removal of individuals who are willfully disrupting the meeting. Such individuals may be arrested. If order cannot be restored by such removal, the members of the Committee may direct that the meeting room be cleared (except for representatives of the press or other news media not participating in the disturbance), and the session may continue.

**Record of Meeting:** Committee meetings are recorded. Copies of recordings are available at a nominal charge, or recordings may be listened to at MTC offices by appointment. Audiocasts are maintained on MTC's Web site ([mtc.ca.gov](http://mtc.ca.gov)) for public review for at least one year.

**Accessibility and Title VI:** MTC provides services/accommodations upon request to persons with disabilities and individuals who are limited-English proficient who wish to address Commission matters. For accommodations or translations assistance, please call 415.778.6757 or 415.778.6769 for TDD/TTY. We require three working days' notice to accommodate your request.

**可及性和法令第六章:** MTC 根據要求向希望來委員會討論有關事宜的殘疾人士及英語有限者提供服務/方便。需要便利設施或翻譯協助者，請致電 415.778.6757 或 415.778.6769 TDD / TTY。我們要求您在三個工作日前告知，以滿足您的要求。

**Acceso y el Titulo VI:** La MTC puede proveer asistencia/facilitar la comunicación a las personas discapacitadas y los individuos con conocimiento limitado del inglés quienes quieran dirigirse a la Comisión. Para solicitar asistencia, por favor llame al número 415.778.6757 o al 415.778.6769 para TDD/TTY. Requerimos que solicite asistencia con tres días hábiles de anticipación para poderle proveer asistencia.

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Attachments are sent to Committee members, key staff and others as appropriate. Copies will be available at the meeting.

All items on the agenda are subject to action and/or change by the Committee. Actions recommended by staff are subject to change by the Committee.



# Metropolitan Transportation Commission

375 Beale Street, Suite 800  
San Francisco, CA 94105

## Legislation Details (With Text)

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**File #:** 20-1615      **Version:** 1      **Name:**  
**Type:** Report      **Status:** Informational  
**File created:** 10/28/2020      **In control:** ABAG Executive Board  
**On agenda:** 12/17/2020      **Final action:**  
**Title:** ABAG President's Report for December 17, 2020  
**Sponsors:**  
**Indexes:**  
**Code sections:**  
**Attachments:**

| Date | Ver. | Action By | Action | Result |
|------|------|-----------|--------|--------|
|------|------|-----------|--------|--------|

ABAG President's Report for December 17, 2020

Jesse Arreguin

Information



# Metropolitan Transportation Commission

375 Beale Street, Suite 800  
San Francisco, CA 94105

## Legislation Details (With Text)

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**File #:** 20-1616      **Version:** 1      **Name:**  
**Type:** Report      **Status:** Informational  
**File created:** 10/28/2020      **In control:** ABAG Executive Board  
**On agenda:** 12/17/2020      **Final action:**  
**Title:** Executive Director's Report for December 17, 2020  
**Sponsors:**  
**Indexes:**  
**Code sections:**  
**Attachments:** [ED Report- ABAG December 2020.pdf](#)

| Date | Ver. | Action By | Action | Result |
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Executive Director's Report for December 17, 2020

Therese W. McMillan

Information



## EXECUTIVE DIRECTOR'S REPORT

ABAG Executive Board

December 17, 2020

### New Appointments

**Kathleen Kane** started on November 30<sup>th</sup> as the General Counsel for both MTC and ABAG. The General Counsel oversees complex litigation and directs outside counsel in many matters, and is a key member of the executive team.

### Retirements

**Adrienne Weil** – Adrienne started with MTC in August 2010 as a General Counsel. Her last day with MTC is December 29, 2020 as Special Counsel.

### KEY HIGHLIGHTS FOR NOVEMBER/DECEMBER:

#### **Bay Trails Update**

With a new \$2.2 million Prop 68 Recreational Trails grant, the City of Richmond and East Bay Regional Park District now have the full \$6.5 million needed to build 2.5 *miles* of Bay Trail along the shoreline from the Richmond-San Rafael Bridge to the northern border of Richmond's Point Molate. Earlier funding came from a \$2.2 million Plan Bay Area *Priority Conservation Area* grant. When completed next December, this multi-use trail will provide the first public access to this stretch of shoreline since the Ohlone people lived there.

### Items to Note

**VMT Policies and Housing Element Site Feasibility Webinar:** To assist local jurisdictions in adopting Vehicle Miles Traveled (VMT) policies, the ABAG-MTC Regional Planning Program hosted more than 100 local jurisdiction housing, planning and transportation staff in a two-hour "VMT Policies and Housing Element Site Feasibility" webinar on December 10. 70% of the participants' in the webinar reported that their local jurisdictions had not yet adopted local VMT policies. Office of Planning and Research Policy Director Erick De Kok provided an overview of the planning context, and staff from the cities of Fremont and Petaluma shared their experiences and insights working on and adopting their policies. A second panel of transportation and CEQA experts shared strategies and approaches to analysis and mitigations both at a planning and project level.

Therese W. McMillan



# Metropolitan Transportation Commission

375 Beale Street, Suite 800  
San Francisco, CA 94105

## Legislation Details (With Text)

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**File #:** 20-1617      **Version:** 1      **Name:**  
**Type:** Minutes      **Status:** Executive Board Consent  
**File created:** 10/28/2020      **In control:** ABAG Executive Board  
**On agenda:** 12/17/2020      **Final action:**  
**Title:** Approval of ABAG Executive Board Minutes of November 19, 2020  
**Sponsors:**  
**Indexes:**  
**Code sections:**  
**Attachments:** [Item 06a Minutes 20201119 453 Draft.pdf](#)

| Date | Ver. | Action By | Action | Result |
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Approval of ABAG Executive Board Minutes of November 19, 2020

Clerk of the Board

Approval



375 Beale Street  
Suite 700  
San Francisco, California  
94105

## Meeting Minutes - Draft

### ABAG Executive Board

*President, Jesse Arreguin, Mayor, City of Berkeley*  
*Vice President, Belia Ramos, Supervisor, County of Napa*  
*Immediate Past President, David Rabbitt, Supervisor, County of Sonoma*

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Thursday, November 19, 2020

6:30 PM

Board Room - 1st Floor (REMOTE)

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#### Association of Bay Area Governments Executive Board Meeting No. 453

The ABAG Executive Board may act on any item on the agenda.

The meeting is scheduled to begin at 6:30 p.m.,  
or immediately following the preceding ABAG or ACFA committee meeting.

Agenda, roster and webcast available at <https://abag.ca.gov>

For information, contact Clerk of the Board at (415) 820-7913.

#### Roster

Candace Andersen, Jesse Arreguin, London Breed, Cindy Chavez, Christopher Clark, David Cortese, Lan Diep, Pat Eklund, Maya Esparza, Nikki Fortunato Bas, Richard Garbarino, Leon Garcia, Liz Gibbons, Lynette Gibson McElhaney, Scott Haggerty, Barbara Halliday, Erin Hannigan, Rich Hillis, David Hudson, Wayne Lee, Jake Mackenzie, Rafael Mandelman, Gordon Mar, Nathan Miley, Karen Mitchoff, Raul Peralez, Julie Pierce, Dave Pine, David Rabbitt, Belia Ramos, Dennis Rodoni, Warren Slocum, Loren Taylor, Lori Wilson.  
Jayne Battey (Non-voting).

#### 1. Call to Order / Roll Call / Confirm Quorum

President Arreguin called the meeting to order at about 6:48 p.m. Quorum was present. Jayne Battey (Advisory member, non-voting) was present.

**Present:** 29 - Andersen, Arreguin, Chan, Chavez, Clark, Cortese, Diep, Eklund, Esparza, Garbarino, Garcia, Gibbons, Gibson McElhaney, Haggerty, Halliday, Hannigan, Hudson, Lee, Mackenzie, Mar, Miley, Mitchoff, Peralez, Pierce, Pine, Rabbitt, Ramos, Rodoni, and Wilson L

**Absent:** 5 - Bas, Canepa, Hillis, Mandelman, and Taylor

#### 2. Public Comment

The following submitted public comment: Cities Association of Santa Clara County, City of Palo Alto, Public Advocates.

### 3. Executive Board Announcements

The following made announcements: Wayne Lee, Rich Garbarino, Jake Mackenzie, Jayne Battey.

### 4. President's Report

- 4.a. [20-1533](#) President's Report of November 19, 2020

President Arreguin gave the report.

### 5. Executive Director's Report

- 5.a. [20-1534](#) Executive Director's Report of November 19, 2020

Therese W. McMillan gave the report.

### 6. Executive Board Consent Calendar

**Upon the motion by Eklund and second by Hudson, the Consent Calendar was approved. The motion passed unanimously by the following vote:**

**Aye:** 28 - Andersen, Arreguin, Chan, Chavez, Clark, Cortese, Eklund, Esparza, Garbarino, Garcia, Gibbons, Gibson McElhaney, Haggerty, Halliday, Hannigan, Hudson, Lee, Mackenzie, Mar, Miley, Mitchoff, Peralez, Pierce, Pine, Rabbitt, Ramos, Rodoni, and Wilson L

**Absent:** 6 - Bas, Canepa, Diep, Hillis, Mandelman, and Taylor

- 6.a. [20-1535](#) Approval of ABAG Executive Board Minutes of October 15, 2020
- 6.b. [20-1572](#) Approval of ABAG Meeting Schedule for 2021
- 6.c. [20-1573](#) Authorization to amend a Bay Area Regional Energy Network (BayREN) funding agreement with Pacific Gas and Electric Company in an amount not to exceed \$956,030 for services for BayREN implementation through December 31, 2022
- 6.d. [20-1574](#) Authorization to amend a Bay Area Regional Energy Network (BayREN) contract with the City and County of San Francisco in an amount not to exceed \$320,390 for services for BayREN implementation through December 31, 2022
- 6.e. [20-1575](#) Authorization to amend a Bay Area Regional Energy Network (BayREN) contract with the Regional Climate Protection Authority in an amount not to exceed \$248,870 for services for BayREN implementation through December 31, 2022

## 7. ABAG Administrative Committee

- 7.a. [20-1536](#) Report on ABAG Administrative Committee Meetings of October 9, 2020 and November 6, 2020

President Arreguin gave the report.

## 8. Joint MTC ABAG Legislation Committee

- 8.a. [20-1537](#) Report on Joint MTC ABAG Legislation Committee Meetings of October 9, 2020 and November 6, 2020

Julie Pierce gave the report.

## 9. ABAG Finance Committee

- 9.a. [20-1538](#) Report on ABAG Finance Committee Meeting of November 19, 2020

Karen Mitchoff gave the report.

- 9.b. [20-1571](#) Report on the Association of Bay Area Governments (ABAG) Fiscal Year (FY) 2019-20 Financial Statements and Accompanying Reports

Brian Mayhew and Kathy Lai, Lead Engagement Partner, Crowe LLP, gave the report.

**Upon the motion by Mitchoff and second by Lee, the report on ABAG financial statements and accompanying reports for Fiscal Year 2019-20 and the reappointment of Crowe LLP for the Fiscal Year 2020-21 annual external audit were approved. The motion passed unanimously by the following vote:**

**Aye:** 26 - Andersen, Arreguin, Chan, Chavez, Clark, Cortese, Eklund, Esparza, Garcia, Gibbons, Gibson McElhaney, Haggerty, Halliday, Hannigan, Hudson, Lee, Mar, Miley, Mitchoff, Peralez, Pierce, Pine, Rabbitt, Ramos, Rodoni, and Wilson L

**Absent:** 8 - Bas, Canepa, Diep, Garbarino, Hillis, Mackenzie, Mandelman, and Taylor

- 9.c. [20-1585](#) Presentation on the Metropolitan Transportation Commission (MTC) Small Business Enterprise (SBE) Program

Edward Phillips gave the report.

**Upon the motion by Mitchoff and second by Pierce, the direction to staff to develop the necessary documents and resolution for an ABAG Small Business Enterprise Program was approved. The motion passed unanimously by the following vote:**

**Aye:** 27 - Andersen, Arreguin, Chan, Chavez, Clark, Cortese, Diep, Eklund, Esparza, Garcia, Gibbons, Gibson McElhaney, Haggerty, Halliday, Hannigan, Hudson, Lee, Mar, Miley, Mitchoff, Peralez, Pierce, Pine, Rabbitt, Ramos, Rodoni, and Wilson L

**Absent:** 7 - Bas, Canepa, Garbarino, Hillis, Mackenzie, Mandelman, and Taylor



## 10. ABAG Regional Planning Committee

- 10.a. [20-1540](#) Report on ABAG Regional Planning Committee Meetings of October 1, 2020 and November 12, 2020

Karen Mitchoff gave the report.

## 11. ABAG Housing Committee

- 11.a. [20-1541](#) Report on ABAG Housing Committee Meetings of October 15, 2020 and November 13, 2020

Lori Wilson gave the report.

- 11.b. [20-1581](#) Approval of Regional Housing Technical Assistance Program Design and Framework

Daniel Saver and Heather Peters gave the report.

**Upon the motion by Wilson and second by Halliday the Regional Housing Technical Assistance Program Design and Framework was approved. The motion passed unanimously by the following vote:**

**Aye:** 28 - Andersen, Arreguin, Chan, Chavez, Clark, Cortese, Diep, Eklund, Esparza, Garcia, Gibbons, Gibson McElhaney, Haggerty, Halliday, Hannigan, Hudson, Lee, Mackenzie, Mar, Miley, Mitchoff, Peralez, Pierce, Pine, Rabbitt, Ramos, Rodoni, and Wilson L

**Absent:** 6 - Bas, Canepa, Garbarino, Hillis, Mandelman, and Taylor

- 11.c. [20-1587](#) Adoption of Resolution No. 20-2020 Authorization to Request Balance of Regional Early Action Planning Grants

Daniel Saver and Heather Peters gave the report.

**Upon the motion by Wilson and second by Lee, Resolution No. 20-2020 was adopted. The motion passed unanimously by the following vote:**

**Aye:** 28 - Andersen, Arreguin, Chan, Chavez, Clark, Cortese, Diep, Eklund, Esparza, Garcia, Gibbons, Gibson McElhaney, Haggerty, Halliday, Hannigan, Hudson, Lee, Mackenzie, Mar, Miley, Mitchoff, Peralez, Pierce, Pine, Rabbitt, Ramos, Rodoni, and Wilson L

**Absent:** 6 - Bas, Canepa, Garbarino, Hillis, Mandelman, and Taylor

## 12. Local Government Service

- 12.a. [20-1614](#) Presentation on Bay Area Energy Atlas

Jenny Berg and Hannah Gustafson, UCLA, gave the report.

**13. Adjournment / Next Meeting**

President Arreguin adjourned the meeting at about 8:48 p.m. The next special meeting of the ABAG Executive Board is on December 17, 2020.



# Metropolitan Transportation Commission

375 Beale Street, Suite 800  
San Francisco, CA 94105

## Legislation Details (With Text)

|                       |   |                      |   |                         |  |
|-----------------------|---|----------------------|---|-------------------------|--|
| <b>File #:</b>        | 21-0011   | <b>Version:</b>      | 1 | <b>Name:</b>            |  |
| <b>Type:</b>          | Report  | <b>Status:</b>       |   | Executive Board Consent |  |
| <b>File created:</b>  | 11/19/2020  | <b>In control:</b>   |   | ABAG Executive Board    |  |
| <b>On agenda:</b>     | 12/17/2020  | <b>Final action:</b> |   |                         |  |
| <b>Title:</b>         | Adoption of Resolution No. 16-2020, Second Revised - Plan Bay Area 2050 - Final Blueprint Strategies, Final Blueprint Growth Geographies, and Regional Growth Forecast, Revised   |                      |   |                         |  |
| <b>Sponsors:</b>      |   |                      |   |                         |  |
| <b>Indexes:</b>       |   |                      |   |                         |  |
| <b>Code sections:</b> |   |                      |   |                         |  |
| <b>Attachments:</b>   | <a href="#">Item 06b 1 Summary Sheet PBA50 Final Blueprint Concurrence Resolution 16 2020 Revised 2.pdf</a><br><a href="#">Item 06b 2 Resolution PBA50 Final Blueprint Concurrence Resolution 16 2020 Revised 2.pdf</a><br><a href="#">Item 06b 3 Strategies Excerpt PBA50 Final Blueprint Concurrence Resolution 16 2020 Revised 2.pdf</a> |                      |   |                         |  |

| Date | Ver. | Action By | Action | Result |
|------|------|-----------|--------|--------|
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Adoption of Resolution No. 16-2020, Second Revised - Plan Bay Area 2050 - Final Blueprint Strategies, Final Blueprint Growth Geographies, and Regional Growth Forecast, Revised

Dave Vautin

Approval

# Association of Bay Area Governments

## Executive Board

December 17, 2020

Agenda Item 6.b.

### Plan Bay Area 2050: Updated Strategy EN7

**Subject:** Adoption of Resolution No. 16-2020, Revised—Plan Bay Area 2050—Final Blueprint Strategies, Final Blueprint Growth Geographies, and Regional Growth Forecast, Revised

**Background:** The ABAG Executive Board adopted ABAG Resolution No. 16-2020 at its September 17<sup>th</sup>, 2020 meeting, with minor revisions made at its October 15<sup>th</sup>, 2020 on transportation strategies T10 and T11. At the September 23<sup>rd</sup>, 2020 Metropolitan Transportation Commission meeting, the Commission also requested that staff explore alternatives to Strategy EN7, which focused on telecommuting as a means to reduce auto commute trips and greenhouse gas emissions.

At the November 20<sup>th</sup> Metropolitan Transportation Commission meeting, the Commission approved a revised Strategy EN7, focused on expanding employer commute trip reduction programs. The revised strategy provides greater flexibility for employers to identify and fund incentives and disincentives to reduce auto commute trips. The revised strategy would encourage not just telecommuting, but also other sustainable modes of transportation like public transit, walking, and biking.

This revised resolution integrates the revised text for Strategy EN7. All other Strategies and Growth Geographies, as well as the Regional Growth Forecast, would remain unchanged from the Board's September 17<sup>th</sup> and October 15<sup>th</sup> actions; this action would allow for full consistency on all Strategies between the two boards. Staff anticipate returning to the Executive Board and to the Commission for action on the Final Blueprint as the Preferred Alternative in the Plan Bay Area 2050 Environmental Impact Report (EIR) in January 2021.


**Issues:** None

**Recommended Action:** The Executive Board is requested to adopt Resolution No. 16-2020, Revised.

**Attachments:** A. ABAG Resolution No. 16-2020, Revised

B. Plan Bay Area 2050 Final Blueprint Strategies – Excerpt of Revised Strategy EN7

**Reviewed:**

  
Therese W. McMillan

**ASSOCIATION OF BAY AREA GOVERNMENTS  
EXECUTIVE BOARD**

**ABSTRACT**

**RESOLUTION NO. 16-2020, REVISED**

This resolution adopts revised Strategy EN7 as part of the the Plan Bay Area 2050 Final Blueprint Strategies to ensure consistency between actions by the Executive Board and the Metropolitan Transportation Commission.

This resolution was previously revised on October 15, 2020 by the ABAG Executive Board to integrate minor updates to two transportation strategies to ensure consistency between actions by the Executive Board and the Metropolitan Transportation Commission.

Further discussion of this subject is contained in the Joint MTC Planning Committee with the ABAG Administrative Committee Summary Sheets dated September 11, 2020. This resolution was revised to reflect an amendment by the Metropolitan Transportation Commission as adopted on November 20, 2020, as detailed under the revised Strategy EN7 attached.

**ASSOCIATION OF BAY AREA GOVERNMENTS  
EXECUTIVE BOARD**

**RESOLUTION NO. 16-2020, REVISED**

**RE: APPROVAL OF FINAL BLUEPRINT STRATEGIES, FINAL BLUEPRINT  
GROWTH GEOGRAPHIES, AND REGIONAL GROWTH FORECAST FOR PLAN BAY  
AREA 2050**

**WHEREAS**, the Metropolitan Transportation Commission (MTC) is the regional transportation planning agency for the San Francisco Bay Area pursuant to Government Code Section 66500 et seq.; and

**WHEREAS**, the Association of Bay Area Governments (ABAG), a joint exercise of powers entity created pursuant to California Government Code Sections 6500 et seq., is the Council of Governments and the regional land use planning agency for the San Francisco Bay Area; and

**WHEREAS**, California Government Code § 65080 et seq. requires MTC to prepare and update a long-range Regional Transportation Plan (RTP), including a Sustainable Communities Strategy (SCS) prepared in conjunction with the ABAG, every four years; and

**WHEREAS**, Plan Bay Area 2050 (“Plan”) will serve as the region’s next-generation plan, ultimately serving as the Regional Transportation Plan and Sustainable Communities Strategy for the San Francisco Bay Area; and

**WHEREAS**, MTC and ABAG jointly adopted the first Plan Bay Area in 2013 (Plan Bay Area 2013) (MTC Resolution No. 4111 and ABAG Resolution No. 06-13), and the second Plan Bay Area in 2017 (Plan Bay Area 2040) (MTC Resolution No. 4300 and ABAG Resolution No. 10-17); and

**WHEREAS**, MTC and ABAG jointly adopted the Vision for Plan Bay Area 2050 in September 2019, emphasizing that resilient and equitable strategies should be prioritized to ensure by the year 2050 the Bay Area is affordable, connected, diverse, healthy, and vibrant for all (MTC Resolution No. 4393 and ABAG Resolution No. 09-19); and

**WHEREAS**, ABAG approved the Regional Growth Forecast Methodology in September 2019, which guided the development of the Plan Bay Area 2050 Regional Growth Forecast; and

**WHEREAS**, the Regional Growth Forecast was shared in draft form in spring 2020 and subsequently updated to reflect significant economic impacts from the coronavirus pandemic and the 2020 recession over the first ten years of the planning horizon; and

**ASSOCIATION OF BAY AREA GOVERNMENTS  
RESOLUTION NO. 16-2020, REVISED**

**WHEREAS**, MTC and ABAG approved the analysis of the 25 Strategies for the Plan Bay Area 2050 Draft Blueprint in February 2020 as well as the corresponding Growth Geographies (MTC Resolution No. 4410 and ABAG Resolution No. 03-2020); and

**WHEREAS**, MTC and ABAG released the Draft Blueprint Findings in early July 2020 showcasing successes and shortcomings through dozens of virtual events for public and stakeholder feedback; and

**WHEREAS**, MTC and ABAG received more than 3,400 comments and engaged more than 7,600 participants in the public engagement process on the Draft Blueprint during July and August 2020 that informed the revised recommendations for the Final Blueprint phase; and

**WHEREAS**, the revised Strategies and Growth Geographies integrate feedback to better address the five challenges identified in the Draft Blueprint phase, including the goal of meeting or exceeding the state-mandated greenhouse gas reduction target, in alignment with the adopted Vision for Plan Bay Area 2050; and

**WHEREAS**, MTC approved revisions to Strategies T10 and T11 to reflect adjusted local transit and regional rail prioritization on September 23rd, 2020 in a manner consistent with the amendment approved by the ABAG Administrative Committee on September 11th, 2020; and

**WHEREAS**, MTC approved revisions to Strategy EN7 to provide more flexibility for employers to reduce commute auto trips on November 20<sup>th</sup>, 2020 in a manner consistent with the amendment approved by the Commission on September 23<sup>rd</sup>, 2020; now, therefore, be it

**ASSOCIATION OF BAY AREA GOVERNMENTS  
RESOLUTION NO. 16-2020, REVISED**

**RESOLVED**, that ABAG, hereby certifies that the foregoing recitals are true and correct and incorporated by this reference; and be it further

**RESOLVED**, that ABAG, as a decision-making body, hereby adopts the amended Strategies, Growth Geographies, and Regional Growth Forecast as listed in the ABAG Administrative Committee item dated September 11th, 2020 substituting the revised Strategy EN7 adopted by MTC, and authorizes staff to analyze associated outcomes in the Plan Bay Area 2050 Final Blueprint.

The foregoing was adopted by the Executive Board the 17<sup>th</sup> day of September, 2020 and revised by the Executive Board the 15<sup>th</sup> day of October, 2020 and this 17<sup>th</sup> day of December, 2020.

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Jesse Arreguín, Chair  
President

**Certification of Executive Board Approval**

I, the undersigned, the appointed and qualified Clerk of the Board of the Association of Bay Area Governments (Association), do hereby certify that the foregoing resolution was adopted by the Executive Board of the Association at a duly called and noticed meeting held in San Francisco, California, and at other remote locations, on the 17<sup>th</sup> day of December, 2020.

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Frederick Castro  
Clerk of the Board



## Environment: Reduce Climate Emissions

### Strategy EN7: Expand Commute Trip Reduction Programs at Major Employers

**Strategy Cost** *not applicable*

**Strategy Objective** Reduce greenhouse gas emissions and traffic congestion by partnering with major employers to shift auto commuters to telecommuting, transit, walking, and bicycling.

**Strategy Description** Set a sustainable commute target for all major employers as part of an expanded Bay Area Commuter Benefits Program. Employers would then be responsible for expanding their commute trip reduction programs, identifying and funding sufficient incentives and/or disincentives to achieve or exceed the target. By the year 2035, no more than 40 percent of each employer's workforce would be eligible to commute by auto on an average workday. To minimize impacts on small businesses, businesses with fewer than 50 employees would be exempt from this policy; furthermore, recognizing the difficulty in serving rural jobs by transit and non-motorized modes, agricultural employers would also be exempt from this policy.

While each employer would have the flexibility to choose the right set of incentives and disincentives for their employees to meet or exceed the target, examples of employer-funded incentives include free or subsidized transit passes, bike & e-bike subsidies and giveaways, free bikeshare memberships, free commuter shuttles for employees, provision of on-site employee housing on current parking lots or other available land, rent or mortgage subsidies for employees residing in walkable transit-rich communities, and direct cash subsidies for walking, biking, or telecommuting. Employer-managed disincentives could include reduction or elimination of parking lots or garages, higher on-site or off-site parking fees, compressed work schedules, and elimination of dedicated workspaces in lieu of shared space.

This strategy works in conjunction with other complementary strategies in Plan Bay Area 2050, including the strategies in which Plan Bay Area 2050 assumes substantial funding that will, prior to 2035, make sustainable trips and this strategy much more attainable.



ABAG

# Metropolitan Transportation Commission

375 Beale Street, Suite 800  
San Francisco, CA 94105

## Legislation Details (With Text)

**File #:** 21-0049      **Version:** 1      **Name:**  
**Type:** Report      **Status:** Executive Board Consent  
**File created:** 12/3/2020      **In control:** ABAG Executive Board  
**On agenda:** 12/17/2020      **Final action:**  
**Title:** Authorization to accept funding from Bay Area Toll Authority in the amount of \$660,000 and to amend an existing contract with Ghilotti Bros, Inc. in an amount of up to \$660,000 for the San Pablo Avenue Green Stormwater Spine Project

**Sponsors:**

**Indexes:**

**Code sections:**

**Attachments:** [Item 06c 1 Summary Sheet SFEP GBI BATA.pdf](#)  
[Item 06c 2 Summary Approval SFEP GBI.pdf](#)

| Date | Ver. | Action By | Action | Result |
|------|------|-----------|--------|--------|
|------|------|-----------|--------|--------|

Authorization to accept funding from Bay Area Toll Authority in the amount of \$660,000 and to amend an existing contract with Ghilotti Bros, Inc. in an amount of up to \$660,000 for the San Pablo Avenue Green Stormwater Spine Project

Caitlin Sweeney

Approval

## Association of Bay Area Governments

### Executive Board

December 17, 2020

Agenda Item 6.c.

#### San Francisco Estuary Partnership

**Subject:** Authorization to accept funding from Bay Area Toll Authority in the amount of \$660,000 and amend existing contracts with Ghilotti Bros, Inc. in an amount of up to \$660,000 for the San Pablo Avenue Green Stormwater Spine Project

**Background:** The San Francisco Estuary Partnership (SFEP) is nearing completion of the San Pablo Ave Green Stormwater Spine Project, providing landscape-based stormwater treatment retrofits at four sites in separate jurisdictions along San Pablo Avenue in the East Bay. Project delays due to need to resolve underground utility conflicts negated the two original bids awarded to Ghilotti Brother, Inc. (GBI) in 2016. These delays also resulted in some of the original implementation grant funding to expire.

The Bay Area Toll Authority (BATA) committed \$2,000,000 to this project in November 2018 to ensure the project would continue, with GBI Contract A and Contract B now on a time & materials basis. Although two sites are completed, GBI projects a need of an additional \$660,000 to finish the remaining two sites and provide two-years of post-construction plant establishment work to all sites.

**Issues:** None

**Recommended Action:** The Executive Board is requested to authorize the Executive Director of the Metropolitan Transportation Commission, or her designee, to (1) accept BATA funds in the amount up to \$660,000 to complete the San Pablo Ave Green Stormwater Spine; (2) amend the Ghilotti Brothers, Inc. Contract A agreement for the San Pablo Ave Green Stormwater Spine project to add an additional \$200,000 for a new not-to-exceed amount of \$850,000; and (3) amend the Ghilotti Brothers, Inc. Contract B agreement for the San Pablo Ave Green Stormwater Spine project to add an additional \$460,000 for a new a not-to-exceed amount of \$2,310,000. Cumulative authorized amount not-to-exceed \$3,160,000 for Ghilotti, Brothers, Inc. Contracts A and B.

**Attachments:** Summary Approval

**Reviewed:**

  
Therese W. McMillan

**s S U M M A R Y   O F   E X E C U T I V E   B O A R D   A P P R O V A L**

|                                       |  |
|---------------------------------------|--|
| <b>Work Item No.:</b>                 | 1720 (FSRC 2305 and 2995)  |
| <b>Contractor:</b>                    | Ghilotti Brothers, Inc.  |
| <b>Work Project Title:</b>            | San Pablo Ave Green Stormwater Spine   |
| <b>Purpose of Project:</b>            | Install green infrastructure to absorb and threat stormwater runoff at multiple sites along San Pablo Ave  |
| <b>Brief Scope of Work:</b>           | Construct green infrastructure projects at Stormwater Spine sites  |
| <b>Project Cost Not to Exceed:</b>    | \$3,160,000  |
| <b>Funding Source:</b>                | CA Natural Resources Agency/Strategic Growth Council, Caltrans, BATA   |
| <b>Fiscal Impact:</b>                 | Funds programmed in FY 20-21 Budget  |
| <b>Motion by Committee:</b>           | The Executive Board is requested to authorize the Executive Director of the Metropolitan Transportation Commission, or her designee, to (1) accept BATA funds in the amount up to \$660,000 to complete the San Pablo Ave Green Stormwater Spine; (2) amend the Ghilotti Brothers, Inc. Contract A agreement for the San Pablo Ave Green Stormwater Spine project to add an additional \$200,000 for a new not-to-exceed amount of \$850,000; and (3) amend the Ghilotti Brothers, Inc. Contract B agreement for the San Pablo Ave Green Stormwater Spine project to add an additional \$460,000 for a new a not-to-exceed amount of \$2,310,000. Cumulative authorized amount not-to-exceed \$3,160,000 for Ghilotti, Brothers, Inc. Contracts A and B. |
| <b>ABAG Executive Board Approval:</b> | Jesse Arreguin, ABAG President   |
| <b>Approval Date:</b>                 |  |



# Metropolitan Transportation Commission

375 Beale Street, Suite 800  
San Francisco, CA 94105

## Legislation Details (With Text)

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**File #:** 21-0115      **Version:** 1      **Name:**  
**Type:** Report      **Status:** Executive Board Consent  
**File created:** 12/14/2020      **In control:** ABAG Executive Board  
**On agenda:** 12/17/2020      **Final action:**  
**Title:** Ratification of Appointments to Housing Committee and Other Committees  
**Sponsors:**  
**Indexes:**  
**Code sections:**  
**Attachments:** [Item 06d Summary Sheet Committee Appointments.pdf](#)

| Date | Ver. | Action By | Action | Result |
|------|------|-----------|--------|--------|
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Ratification of Appointments to Housing Committee and Other Committees

Jesse Arreguin

Approval

**Association of Bay Area Governments**

**Executive Board**

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**December 17, 2020**

**Agenda Item 6.d.**

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**Committee Appointments**

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**Subject:** Ratification of Appointments to Housing Committee and Other Committees

**Background:** According to the ABAG Bylaws, the President makes appointments to committees with the advice and consent of the Executive Board.

ABAG Housing Committee

To Be Announced

Other Committees

To Be Announced

**Issues:** None

**Recommended Action:** The Executive Board is requested to ratify the appointments to the ABAG Housing Committee and other committees, as reported.

**Attachments:** None

**Reviewed:**



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Therese W. McMillan



# Metropolitan Transportation Commission

375 Beale Street, Suite 800  
San Francisco, CA 94105

## Legislation Details (With Text)

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**File #:** 20-1618      **Version:** 1      **Name:**  
**Type:** Report      **Status:** Informational  
**File created:** 10/28/2020      **In control:** ABAG Executive Board  
**On agenda:** 12/17/2020      **Final action:**  
**Title:** Report on ABAG Administrative Committee Meeting of December 11, 2020  
**Sponsors:**  
**Indexes:**  
**Code sections:**  
**Attachments:**

| Date | Ver. | Action By | Action | Result |
|------|------|-----------|--------|--------|
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Report on ABAG Administrative Committee Meeting of December 11, 2020

Jesse Arreguin

Information



# Metropolitan Transportation Commission

375 Beale Street, Suite 800  
San Francisco, CA 94105

## Legislation Details (With Text)

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**File #:** 20-1619      **Version:** 1      **Name:**

**Type:** Report      **Status:** Informational

**File created:** 10/28/2020      **In control:** ABAG Executive Board

**On agenda:** 12/17/2020      **Final action:**

**Title:** Report on Joint MTC ABAG Legislation Committee Meeting of December 11, 2020

**Sponsors:**

**Indexes:**

**Code sections:**

**Attachments:**

| Date | Ver. | Action By | Action | Result |
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Report on Joint MTC ABAG Legislation Committee Meeting of December 11, 2020

Jesse Arreguin

Information





# Metropolitan Transportation Commission

375 Beale Street, Suite 800  
San Francisco, CA 94105

## Legislation Details (With Text)

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| <b>File #:</b>       | 21-0012                                    | <b>Version:</b>      | 1 | <b>Name:</b>             |  |
| <b>Type:</b>         | Report                                     | <b>Status:</b>       |   | Executive Board Approval |  |
| <b>File created:</b> | 11/19/2020                                 | <b>In control:</b>   |   | ABAG Executive Board     |  |
| <b>On agenda:</b>    | 12/17/2020                                 | <b>Final action:</b> |   |                          |  |
| <b>Title:</b>        | Proposed Final 2021 Joint Advocacy Program |                      |   |                          |  |

Proposed Final 2021 Joint Advocacy Program for MTC and ABAG, expressing the agencies' state and federal legislative priorities.

**Sponsors:**

**Indexes:**

**Code sections:**

**Attachments:** [Item 08b 1 Summary Sheet Joint Advocacy Program.pdf](#)  
[Item 08b 2 Attachment A Joint Legislation Cmte Final Advocacy Program Summary Sheet.pdf](#)  
[Item 08b 3 Attachment B Proposed 2021 Final Advocacy Program 12.11.20.pdf](#)

| Date | Ver. | Action By | Action | Result |
|------|------|-----------|--------|--------|
|------|------|-----------|--------|--------|

Proposed Final 2021 Joint Advocacy Program

Proposed Final 2021 Joint Advocacy Program for MTC and ABAG, expressing the agencies' state and federal legislative priorities.

Rebecca Long and Randy Rentschler

Approval

**Association of Bay Area Governments**

**Executive Board**

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**December 17, 2020**

**Agenda Item 8.b.**

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**Legislation**

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**Subject:** Proposed Final 2021 Joint Advocacy Program for MTC and ABAG, expressing the agencies' state and federal legislative priorities

**Background:** On December 11, 2020, the Joint MTC ABAG Legislation Committee received a report on proposed final 2021 Joint Advocacy Program for the Metropolitan Transportation Commission and the Association of Bay Area Governments.

At the Executive Board meeting on December 17, 2020, staff will report on the Joint MTC ABAG Legislation Committee recommendation.

The summary sheet and attachments from the Joint MTC ABAG Legislation Committee meeting and the Joint 2021 Advocacy Program, Revised, are attached.

**Issues:** None

**Recommended Action:** The Executive Board is requested to approve the proposed MTC ABAG 2021 Advocacy Program.

**Attachments:** A. Summary Sheet, Joint MTC ABAG Legislation Committee meeting on December 11, 2020

B. Joint 2021 Advocacy Program, Revised

**Reviewed:**



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Therese W. McMillan

**Metropolitan Transportation Commission and Association of Bay Area Governments**  
**Joint MTC ABAG Legislation Committee**

December 11, 2020

Agenda Item 4a

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**Proposed Final 2021 Joint Advocacy Program**

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- Subject:** Proposed Final 2021 Joint Advocacy Program for MTC and ABAG, expressing the agencies' state and federal legislative priorities.
- Overview:** Attachment A is the proposed Final 2021 Joint Advocacy Program, which incorporates some adjustments based on the Committee's feedback last month as well as feedback from partner agency staff and other stakeholders. Modifications incorporated as a result of the Committee's feedback include:
- Addition of references to support for additional state and federal funding for the San Francisco Estuary.
  - Modifications to Item 3B related to housing production to clarify the intent to authorize housing as a permitted use in *certain* commercial zones, including office parks and major commercial corridors (i.e. not all commercial areas) and further clarity that such uses would still be subject to local approval, but would not require zoning modifications, a costly and lengthy process. Finally, clarify support for accelerating *locally-proposed* zoning changes that accommodate increased housing production near jobs-rich, high-quality transit and high-resource areas.
- The draft advocacy program has been shared with ABAG's Regional Planning Committee via email and presented it to MTC's Policy Advisory Council for feedback. No comments have been received by RPC members. The Policy Advisory Council was generally supportive, though several members expressed concerns about including California Environmental Quality Act (CEQA) Streamlining in our priorities, a longstanding goal that seeks to accelerate the region's priorities while still safeguarding the environment.
- An additional meeting is planned with Bay Area legislative staff as well as a second meeting with staff from regional agencies across the state to share our respective advocacy programs and identify opportunities for collaboration. As such, further refinements to the final document may be presented at your meeting.
- We look forward to hearing further input and finalizing our Joint Advocacy Program for forwarding to the ABAG Executive Board and the Commission this month.
- Issues:** None identified.
- Recommendation:** Staff recommends the proposed MTC/ ABAG 2020 Advocacy Program be forwarded to the ABAG Executive Board and MTC Commission for approval.
- Attachments:** Attachment A: Proposed Final 2021 Joint Advocacy Program

  
Therese W. McMillan



## 2021 FINAL ADVOCACY PROGRAM (PROPOSED)

### State Advocacy Goals and Objectives

**Note:** While the wording has been updated on most items from our 2020 Advocacy Program, the most substantive changes are shaded. Underlined or strikethrough sections represent proposed changes relative to the draft document presented in November.

**1. Transportation Funding:** Defend existing transportation revenue sources and secure new revenue to assist in the implementation of Plan Bay Area 2050 priorities. In the absence of sufficient federal support, secure new funding and increased flexibility to expend existing funds to aid the region's public transit operators struggling with the loss of transit ridership and revenue due to COVID-19.

A. Transit operating funding

In partnership with the region's transit operators and the California Transit Association, seek state assistance to provide emergency transit operating funding to prevent mass layoffs and major reductions in transit service if Congress fails to provide sufficient funding in a timely manner.

B. Regional transportation revenue ballot measure

Engage in any renewed efforts that emerge to authorize a regional transportation revenue measure, including exploring opportunities for such a measure to be placed on through voter initiative within the nine-counties. Advocate for provisions that are consistent with Plan Bay Area 2050 and recommendations emerging from the Blue Ribbon Transit Recovery Task Force, including advancing a more seamless regional transit system and a more resilient transportation system overall. Ensure the expenditure plan is developed in an inclusive manner that provides for meaningful input by a broad array of stakeholders and helps advance social equity across the Bay Area.

C. Reduce Caltrans Administrative Overhead Charges to MTC and the BATA

Expand to MTC and the Bay Area Toll Authority (BATA) cost-savings provisions that were incorporated into the FY 2020-21 State Budget with respect to local agencies in order to reduce BATA administrative costs and free up funding for key bridge maintenance and other priorities.

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| D. Zero-emission bus mandate <u>and proposed ferry regulations</u>   | Building on <a href="#">Executive Order N-79-20</a> , seek additional dedicated funding to help transit operators convert their bus fleets to zero-emission in order to meet the state’s Innovative Clean Transit rule and accelerate the decarbonization of the transportation system. <u>Monitor and engage in efforts to ensure proposed regulations to reduce emissions from high-speed passenger ferries are designed in a manner that is feasible and ensures no disruption in ferry operations.</u>  |
| E. Equitable access to transportation and supporting infrastructure  | Support broadening eligibility requirements in existing and/or new transportation funding streams to enable their use as a subsidy for low-income transportation system users (e.g. discounted fares for public transportation or shared mobility services), consistent with performance measure updates outlined in 2A. Support efforts to expand access to broadband for low-income households who might not otherwise have the option to work remotely. Ensure that legislation aimed at benefiting disadvantaged communities use a definition that includes low-income communities and does not rely exclusively on communities defined by the state’s CalEnviroScreen method which disproportionately excludes the Bay Area low-income communities relative to other parts of the state. |
| F. Active Transportation: Regional trails and bicycle/pedestrian infrastructure improvements   | Monitor and support opportunities for additional funding for active transportation, including enhanced active transportation access and safety improvements on existing roadways (i.e. “complete streets”) as well as funding for regional trails, such as the San Francisco Bay Trail, the Bay Area Ridge Trail, and the Great California Delta Trail.   |
| <b>2. Public Transit:</b> Support policies aimed at ensuring public transit is an affordable, reliable and convenient transportation option. |   |
| A. Transportation Development Act (TDA) performance standards update   | Continue to participate in the TDA Reform Task Force convened by the California Transit Association to explore updates to the TDA’s (Transportation Development Act) eligibility requirements. In an era of emergent on-demand transportation options and dwindling transit ridership, alternative performance measures that are focused on incentivizing actions that improve transit service and increase ridership are appropriate and would be more consistent with state and regional climate and equity goals than efficiency-based measures. Ensure discount fares aimed at boosting ridership and improving social equity do not  |

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|  | result in reduced state funding. Pursue relief from TDA audits during the current economic downturn.  |
| B. Blue Ribbon Transit Recovery Task Force Recommendations   | Support legislation emerging from the recommendations of the Blue-Ribbon Transit Recovery Task Force. Seek to ensure the implementation of initiatives aimed at: 1) getting transit out of traffic; 2) making the transit rider experience more seamless and convenient; and 3) where appropriate, governance changes expected to improve transit service by eliminating the friction and/or redundancy caused by existing transit agency service area boundaries.  |
| <b>3. Housing:</b> Improve access to opportunity by supporting policies aimed at increasing production of housing and increasing funding to produce and preserve affordable housing and associated infrastructure to help build complete communities. Protect tenants and low-income communities from unjust evictions and displacement. |   |
| A. Increase funding available for affordable housing and other supportive infrastructure while also reducing the cost of housing production.   | Monitor and support efforts to provide additional state resources for housing and housing-supportive infrastructure, planning and services to ensure housing investments can be made in conjunction with improvements to parks/open space, and other resources to improve Bay Area resident's quality of life. <u>Support proposals to drive down the cost of affordable housing production.</u>  |
| B. Pursue a range of strategies to help local jurisdictions <u>produce the</u> <del>accommodate</del> additional housing units assigned as part of the Regional Housing Needs Allocation (RHNA) process  | Continue to support legislation to boost housing density near jobs-rich, <del>and</del> high-quality transit, <u>and high-resource</u> areas with reasonable local flexibility provided. Support proposals to authorize housing <u>as a permitted use</u> <del>to be developed</del> in <u>certain</u> commercial zones, such as shopping malls, <u>office parks</u> and <u>major</u> commercial corridors, <u>subject to local approval, but without requiring zoning changes.</u> Continue to support legislation to accelerate the production of new housing and the <u>implementation of locally-proposed zoning changes that are needed to accommodate RHNA allocations and that focus new housing near jobs-rich, high-quality transit and high-resource areas.</u> |
| C. Bay Area Housing Finance Authority Pilot Project Funding  | Seek one-time funding of \$5 million from the FY 2021-22 State Budget to support Bay Area Housing Finance Authority pilot projects as a match to contributions sought from philanthropic and private-sector sources.  |
| D. Homelessness Prevention   | Support policies and funding proposals aimed at reducing and preventing homelessness in the Bay Area.   |

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| <b>4. Project Delivery:</b> Support strategies to speed up the delivery of transportation and housing projects with the goal of delivering improvements faster and at a lower cost.  |  |
| A. Flexibility in Contracting & Public-Private Partnerships  | Increase flexibility in contracting and public private partnerships. Support reforms to expedite project delivery. Increase flexibility in the Caltrans design review process and provide broad authority for the use of design-build and public-private partnerships by Caltrans and regional transportation agencies. Support policies that would authorize public agencies to partner with the private sector on public right of way to accelerate deployment of technology, such as fiber optic cable, necessary for connected vehicle deployment. |
| B. California Environmental Quality Act (CEQA)   | Building on the success of SB 288 (Wiener), monitor and engage on legislation related to CEQA with the goal of accelerating transportation and housing development projects that are consistent with local and regional plans without diminishing environmental safeguards.  |
| <b>5. Congestion Relief:</b> Support policies aimed at reducing vehicle miles traveled and associated traffic congestion, including, but not limited to, pricing strategies and employer-based programs to help reduce the share of commuting by single-occupant vehicles. Keep equity impacts in mind when evaluating any such pricing strategies.  |  |
| <b>6. System Effectiveness:</b> Advocate for policies that improve the Bay Area’s transportation system’s effectiveness and service delivery, including improved enforcement, minimization of fraud and litigation, and protection of user’s privacy. Ensure agencies can communicate with their customers to provide relevant transportation-related information and quality service while following industry best practices with regard to enabling customers to opt-in to receive non-essential communications. |  |
| A. Improve toll collection & enforcement   | Support legislation affirming toll agencies’ ability to share information about toll transactions necessary for the seamless collection of tolls and toll penalties. Ensure the legislation retains existing privacy protections for customers, clarifies current law with respect to handling of personally identifiable information by toll agencies and their subcontractors, and more clearly defines toll agencies obligations with respect to delivery of toll violation notices.  |
| B. Improve HOV and Express Lanes Performance   | Support efforts to improve the performance of high-occupancy vehicle (HOV) and express lanes through enhanced enforcement of vehicle passenger occupancy requirements. Oppose legislation authorizing expanded access to HOV lanes by non-HOVs or further reduced toll rates for clean air vehicles or other vehicles to access express lanes.   |

**7. Mobility on Demand:** Engage in regulatory and legislative efforts to facilitate the deployment of new mobility technologies with the goal of accelerating their safety, accessibility, mobility, environmental, equity, economic and workforce benefits, including opportunities to increase access to transit and reduce the share of single-occupancy vehicle trips. Advocate for increased access to critical travel pattern data by local, regional and state agencies for transportation and land use planning and operational purposes while ensuring privacy is protected.

**8. Climate Change, Energy Efficiency, Resilience & Estuary Health:** Support funding and policy strategies to help achieve and better coordinate state and regional climate goals, advance energy efficiency and improve the Bay Area’s resilience to natural hazards and the impacts of climate change, including earthquakes, sea level rise and fire. Support proposals for increased funding to improve the health of the San Francisco Estuary.

A. SB 375 implementation and reform

In partnership with other metropolitan planning organizations and other stakeholders, explore potential updates to SB 375 (Steinberg, 2008) with the goal of focusing less on emission models and more on near term, ambitious but achievable actions that will reduce GHGs in partnership, rather than in competition, with the state.

Explore an expansion in the scope of the Sustainable Communities Strategy (SCS) to incorporate climate adaptation, as well as other important regional and statewide objectives, such as affirmatively furthering fair housing, social equity, public health and economic development.

Support legislation to increase the availability of funding at the regional level to help *implement* the SCS, as well as policy tools, such as roadway pricing, to reduce single-occupancy vehicle travel in a manner that ensures equitable policy outcomes.

As part of SB 375 reform proposals, seek alignment of the timelines for the development of the SCS in the Bay Area-Sacramento-San Joaquin Valley megaregion to ensure coordination on forecasting assumptions, strategies, and investments to improve the movement of people and goods.

B. Electrifying the passenger vehicle fleet

Consistent with ~~the Plan Bay Area 2050 Blueprint~~ and the state’s transportation electrification goals, support proposals to accelerate the purchase of zero-emission passenger and light-duty vehicles. ~~enact a feebate program that establishes higher registration fees on higher emission vehicles to help fund rebates for cleaner vehicles.~~ Support provisions to mitigate the regressive impact of such fees on lower income households.



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| C. State Route 37 improvements                                       | Support legislation in collaboration with Caltrans and the four north bay counties of Marin, Napa, Solano and Sonoma to authorize tolls on State Route 37 to help fund interim congestion relief and the long-term multi-modal reconstruction and resilience of the roadway.   |
| D. Increase the Bay Area's preparedness for a major earthquake       | Monitor and support legislation aimed at improving the region's seismic preparedness.  |
| E. Wildfire mitigation   | Monitor and support legislation aimed at protecting current and future Bay Area residents from wildfire risk.  |
| F. Climate adaptation  | <p>Seek state funding for regions and localities to invest in <u>planning</u>, projects and programs that will improve the Bay Area's resilience to the impacts of climate change, including fire and sea level rise.</p> <p>Ensure that statewide climate adaptation legislation: 1) complements and builds upon existing local and regional agency capacity and local and regional planning processes and 2) uses the nine-county Bay Area as the geography for <i>regional</i> climate adaptation planning. As in Item 2C, advocate that any funding geared towards disadvantaged communities use a definition that includes low-income communities and households rather than relying exclusively on the state's CalEnviroScreen method.</p> |
| <b>9. Safety:</b> Improve transportation system safety for all users |  |
| A. Zero traffic fatalities goal (Vision Zero)                        | Building on the <a href="#">recommendations of the Zero Traffic Fatalities Task Force</a> , support legislation aimed at achieving the Vision Zero goals of no roadway-related deaths or serious injuries by improving safety for all road users, including non-motorists. In particular, support modifying the state's 85 <sup>th</sup> percentile methodology for determining speed limits to provide greater flexibility to local agencies and continue to support authorization of automated speed enforcement technology to enforce speed limits.   |
| B. Passenger rail safety   | Support efforts to increase passenger rail safety through increased funding for positive train control and other strategies to reduce risk.  |

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| <b>10. Governance:</b> Brown Act Reforms | Monitor and engage in legislation, in coordination with other local agency associations and regional agencies, related to updating the Ralph M. Brown Act (Brown Act) to incorporate some of the increased flexibility provided for during COVID-19 into the long-term provisions of the Brown Act, particularly in relation to remote participation in meetings. |
|--|---|

| <b>Federal Advocacy Goals and Objectives</b>  |  |
|---|--|
| <b>1.-2. Transportation and Housing Funding:</b> Support robust federal investment in Bay Area transportation and housing infrastructure                        |  |
| A. <del>D.</del> COVID-19 Emergency Aid and Economic Recovery   | Continue partnering with local, state, and national partners to advocate for federal aid to support state and local responses to the COVID-19 public health emergency, including advocating for state and local government funding, resources to backfill for lost transportation revenues, and emergency assistance to keep renters and homeowners housed. Support an economic recovery package that invests in sustainable transportation infrastructure, <del>and</del> affordable housing, <u>and climate adaptation</u> .   |
| B. <del>A.</del> Fiscal Year 2022 transportation and housing programmatic appropriations  | Partner with local, regional and statewide transportation agencies as well as national stakeholders to ensure that Congress funds highway, transit and rail programs at no less than FAST Act-authorized levels. If Congress proposes to increase appropriations above FAST Act-authorized levels, seek to maximize Bay Area funding in revenue allocations. Additionally, work to defend federal affordable housing funds and programs, such as Section 8 housing vouchers, the HOME Investment Partnership Program and the Community Development Block Grant Program.  |
| C. <del>B.</del> Advocate for discretionary transportation grant awards, including Capital Investment Grant funding for Resolution 3434/ Plan Bay Area Projects | Work with regional, state and national partners to advocate for implementation of the Capital Investment Grant (CIG) Program as authorized by the FAST Act. Support federal appropriations consistent with the full funding grant agreements approved for the Caltrain Peninsula Corridor Electrification and BART Transbay Core Capacity projects. Seek to advance through the CIG process the Bay Area’s next generation of transit expansion projects, namely: BART to Silicon Valley Phase 2 and San Francisco Transbay Transit Center (Phase 2)/Downtown Extension (DTX). Support additional Bay Area transportation agency and transit operator efforts to secure discretionary funding for projects consistent with <i>Plan Bay Area 2050</i> . |
| D. <del>C.</del> Housing production   | Support efforts to expand federal housing production tools, including the Low-Income Housing Tax Credit Program, California’s largest source of federal funding for new affordable housing.  |

**2.4. Surface Transportation Reauthorization:** Engage in national deliberations prioritizing the funding and policy framework for the next surface transportation bill

Work with our regional and national partners to support a long-term, fully funded transportation authorization that supports states and regions in achieving national goals related to infrastructure condition, safety, mobility, and air quality. Ensure that the next authorization bill retains discretion for MTC to invest funds in ways that further our region's goals to improve equity, respond to a changing climate, and increase access to affordable, transit- and jobs-oriented housing. Also seek new resources to support climate adaptation and the deployment of new transportation technology to address the Bay Area's mobility challenges.

Working with our statewide and national partners, advocate for modifications to current law to facilitate congestion pricing, including cordon pricing and express lanes, on the federal aid highway system.

MTC's federal transportation advocacy efforts center around building on the progress made in the Fixing America's Surface Transportation (FAST) Act, as follows:

1. **Raise New Revenues & Grow Existing Programs:** Raise revenues to restore Highway Trust Fund solvency and increase federal transportation investment. Grow core FAST Act-authorized surface transportation programs, which have proven effective in delivering essential funds to California and the Bay Area.
2. **FAST Act Updates:** Within the FAST Act framework, grow federal support for transit and regional mobility solutions, update transit programs to reward Bay Area best practices, and expedite project delivery without harming the environment.
3. **21<sup>st</sup> Century Challenges and Opportunities:** Establish the federal government as a strong partner in state and regional efforts to make transportation networks responsive to the changing climate and transformative transportation technologies. The next transportation bill should include significant new resources for metropolitan areas to invest in solutions to the myriad mobility and related challenges facing the Bay Area and metros nationwide.

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| <b>3. Climate Protection, Adaptation, Environmental Justice:</b> Advocate for a strong federal partner in the Bay Area’s efforts to improve air quality, reduce greenhouse gas (GHG) emissions, and make our communities and transportation networks resilient to a changing climate, especially in communities of concern that are most vulnerable to the impacts of climate change. <u>Advocate for passage of legislation to improve the health of the San Francisco Estuary.</u> |  |
| A. Climate change mitigation   | Advocate for the federal government to take bold action to reduce GHG emissions and limit the magnitude of the climate crisis. Join with our statewide partners to support restoring California’s authority to enforce an aggressive clean vehicle mandate and preserving the air quality and climate change laws and regulations—including California’s successful Cap and Trade program—needed to meet the state’s ambitious target of reducing GHG emissions to 40 percent below 1990 levels by 2030.   |
| B. Disaster mitigation and resilience  | Seek to secure resources for the Bay Area to invest in disaster mitigation and resilience, including investing in strategically placed green and grey infrastructure to protect our communities and residents that are most vulnerable to the adverse effects of climate change. Support a strong regional role in disaster mitigation and resilience planning.  |
| C. San Francisco <del>Bay</del> Estuary  | Advocate for passage of legislation to reauthorize the <u>National Estuary Program</u> and <u>increased funding</u> aimed at improving the health and resilience of the San Francisco <del>Bay</del> Estuary.  |
| <b>4. Transportation Innovation and Shared Mobility:</b> Support policies that enable technological innovations to improve mobility, including mobility on demand, while protecting the public’s interest.   |  |
| A. Automated and Connected Vehicles  | In partnership with Bay Area cities and counties, the business community, and state and national transportation organizations, engage in regulatory and legislative efforts related to facilitating the deployment of transformative transportation technologies with the goal of accelerating safety, mobility, environmental, equity and economic benefits associated with new mobility technologies, including application in the transit sector. With respect to connected vehicles and autonomous vehicles (CV/AV), continue to support policies that facilitate joint CV/AV deployment, including preservation of capacity in the 5.9 GHz spectrum band. Additionally, ensure strong federal vehicle safety standards while also preserving the ability of state and local agencies to continue to set policies governing the operation of vehicles on highways and local roads, regardless of whether they are driven autonomously or manually. |

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| B. Shared Mobility | Advocate for federal legislative and regulatory updates that support shared mobility options such as bike-share, shared rides, carpooling, and shared scooters. Support expanding pre-tax transportation fringe benefit eligibility to include shared mobility options. This change would support the now-permanent Bay Area Commuter Benefits program by expanding federal tax incentives utilize alternatives to single occupancy travel to commute to work. |
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## 2021 ADVOCACY PROGRAM (PROPOSED)

### State Advocacy Goals and Objectives

**Note: Substantive changes made relative to our 2020 Advocacy Program are shaded. Underlined or strikethrough words reflect changes made at the December 2020 Joint Legislation Committee meeting.**

**1. Transportation Funding:** Defend existing transportation revenue sources and secure new revenue to assist in the implementation of Plan Bay Area 2050 priorities. In the absence of sufficient federal support, secure new funding and increased flexibility to expend existing funds to aid the region's public transit operators struggling with the loss of transit ridership and revenue due to COVID-19.

A. Transit operating funding

In partnership with the region's transit operators and the California Transit Association, seek state assistance to provide emergency transit operating funding to prevent mass layoffs and major reductions in transit service if Congress fails to provide sufficient funding in a timely manner.

B. Regional transportation revenue ballot measure

Engage in any renewed efforts that emerge to authorize a regional transportation revenue measure, including exploring opportunities for such a measure to be placed on through voter initiative within the nine-counties. Advocate for provisions that are consistent with Plan Bay Area 2050 and recommendations emerging from the Blue Ribbon Transit Recovery Task Force, including advancing a more seamless regional transit system and a more resilient transportation system overall. Ensure the expenditure plan is developed in an inclusive manner that provides for meaningful input by a broad array of stakeholders and helps advance social equity across the Bay Area.

C. Reduce Caltrans Administrative Overhead Charges to MTC and the BATA

Expand to MTC and the Bay Area Toll Authority (BATA) cost-savings provisions that were incorporated into the FY 2020-21 State Budget with respect to local agencies in order to reduce BATA administrative costs and free up funding for key bridge maintenance and other priorities.

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| D. Zero-emission bus mandate and proposed ferry regulations  | Building on <a href="#">Executive Order N-79-20</a> , seek additional dedicated funding to help transit operators convert their bus fleets to zero-emission in order to meet the state's Innovative Clean Transit rule and accelerate the decarbonization of the transportation system. Monitor and engage in efforts to ensure proposed regulations to reduce emissions from high-speed passenger ferries are designed in a manner that is feasible and ensures no disruption in ferry operations.   |
| E. Equitable access to transportation and supporting infrastructure  | Support broadening eligibility requirements in existing and/or new transportation funding streams to enable their use as a subsidy for low-income transportation system users (e.g. discounted fares for public transportation or shared mobility services), consistent with performance measure updates outlined in 2A. Support efforts to expand access to broadband for low-income households who might not otherwise have the option to work remotely. Ensure that legislation aimed at benefiting disadvantaged communities use a definition that includes low-income communities and does not rely exclusively on communities defined by the state's CalEnviroScreen method which disproportionately excludes the Bay Area low-income communities relative to other parts of the state. |
| F. Active Transportation: Regional trails and bicycle/pedestrian infrastructure improvements   | Monitor and support opportunities for additional funding for active transportation, including enhanced active transportation access and safety improvements on existing roadways (i.e. "complete streets") as well as funding for regional trails, such as the San Francisco Bay Trail, the Bay Area Ridge Trail, and the Great California Delta Trail.   |
| <b>2. Public Transit:</b> Support policies aimed at ensuring public transit is an affordable, reliable and convenient transportation option. |   |
| A. Transportation Development Act (TDA) performance standards update   | Continue to participate in the TDA Reform Task Force convened by the California Transit Association to explore updates to the TDA's (Transportation Development Act) eligibility requirements. In an era of emergent on-demand transportation options and dwindling transit ridership, alternative performance measures that are focused on incentivizing actions that improve transit service and increase ridership are appropriate and would be more consistent with state and regional climate and equity goals than efficiency-based measures. Ensure discount fares aimed at boosting ridership and improving social equity do not  |

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|  | result in reduced state funding. Pursue relief from TDA audits during the current economic downturn.   |
| B. Blue Ribbon Transit Recovery Task Force Recommendations   | Support legislation emerging from the recommendations of the Blue-Ribbon Transit Recovery Task Force. Seek to ensure the implementation of initiatives aimed at: 1) getting transit out of traffic; 2) making the transit rider experience more seamless and convenient; and 3) where appropriate, governance changes expected to improve transit service by eliminating the friction and/or redundancy caused by existing transit agency service area boundaries.   |
| <b>3. Housing:</b> Improve access to opportunity by supporting policies aimed at increasing production of housing and increasing funding to produce and preserve affordable housing and associated infrastructure to help build complete communities. Protect tenants and low-income communities from unjust evictions and displacement. |  |
| A. Increase funding available for affordable housing and other supportive infrastructure while also reducing the cost of housing production.   | Monitor and support efforts to provide additional state resources for housing and housing-supportive infrastructure, planning and services to ensure housing investments can be made in conjunction with improvements to parks/open space, and other resources to improve Bay Area resident's quality of life. <u>Support proposals to drive down the cost of affordable housing production.</u>   |
| B. Pursue a range of strategies to help produce the additional housing units assigned as part of the Regional Housing Needs Allocation (RHNA) process  | Continue to support legislation to boost housing density near jobs-rich, high-quality transit, and high-resource areas with reasonable local flexibility provided. Support proposals to authorize housing as a permitted use in certain commercial zones, such as shopping malls, office parks and major commercial corridors, subject to local approval, but without requiring zoning changes. Continue to support legislation to accelerate the production of new housing and the implementation of locally-proposed zoning changes that are needed to accommodate RHNA allocations and that focus new housing near jobs-rich, high-quality transit and high-resource areas. <u>Seek to ensure that policies to incentivize new housing construction include anti-displacement provisions and prioritize the construction of affordable housing.</u> |
| C. Bay Area Housing Finance Authority Pilot Project Funding  | Seek one-time funding of \$5 <b>\$18.5</b> million from the FY 2021-22 State Budget to support Bay Area Housing Finance Authority pilot projects as a match to contributions sought from philanthropic and private-sector sources.   |



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| D. Homelessness Prevention   | Support policies and funding proposals aimed at reducing and preventing homelessness in the Bay Area.  |
| <b>4. Project Delivery:</b> Support strategies to speed up the delivery of transportation and housing projects with the goal of delivering improvements faster and at a lower cost.  |  |
| A. Flexibility in Contracting & Public-Private Partnerships  | Increase flexibility in contracting and public private partnerships. Support reforms to expedite project delivery. Increase flexibility in the Caltrans design review process and provide broad authority for the use of design-build and public-private partnerships by Caltrans and regional transportation agencies. Support policies that would authorize public agencies to partner with the private sector on public right of way to accelerate deployment of technology, such as fiber optic cable, necessary for connected vehicle deployment. |
| B. California Environmental Quality Act (CEQA)   | Building on the success of SB 288 (Wiener), monitor and engage on legislation related to CEQA with the goal of accelerating transportation and housing development projects that are consistent with local and regional plans without diminishing environmental safeguards.  |
| <b>5. Congestion Relief:</b> Support policies aimed at reducing vehicle miles traveled and associated traffic congestion, including, but not limited to, pricing strategies and employer-based programs to help reduce the share of commuting by single-occupant vehicles. Keep equity impacts in mind when evaluating any such pricing strategies.  |  |
| <b>6. System Effectiveness:</b> Advocate for policies that improve the Bay Area's transportation system's effectiveness and service delivery, including improved enforcement, minimization of fraud and litigation, and protection of user's privacy. Ensure agencies can communicate with their customers to provide relevant transportation-related information and quality service while following industry best practices with regard to enabling customers to opt-in to receive non-essential communications. |  |
| A. Improve toll collection & enforcement   | Support legislation affirming toll agencies' ability to share information about toll transactions necessary for the seamless collection of tolls and toll penalties. Ensure the legislation retains existing privacy protections for customers, clarifies current law with respect to handling of personally identifiable information by toll agencies and their subcontractors, and more clearly defines toll agencies obligations with respect to delivery of toll violation notices.  |

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| <p>B. Improve HOV and Express Lanes Performance</p>   | <p>Support efforts to improve the performance of high-occupancy vehicle (HOV) and express lanes through enhanced enforcement of vehicle passenger occupancy requirements. Oppose legislation authorizing expanded access to HOV lanes by non-HOVs or further reduced toll rates for clean air vehicles or other vehicles to access express lanes.</p>  |
| <p><b>7. Mobility on Demand:</b> Engage in regulatory and legislative efforts to facilitate the deployment of new mobility technologies with the goal of accelerating their safety, accessibility, mobility, environmental, equity, economic and workforce benefits, including opportunities to increase access to transit and reduce the share of single-occupancy vehicle trips. Advocate for increased access to critical travel pattern data by local, regional and state agencies for transportation and land use planning and operational purposes while ensuring privacy is protected.</p> |  |
| <p><b>8. Climate Change, Energy Efficiency, Resilience &amp; Estuary Health:</b> Support funding and policy strategies to help achieve and better coordinate state and regional climate goals, advance energy efficiency and improve the Bay Area's resilience to natural hazards and the impacts of climate change, including earthquakes, sea level rise and fire. Support proposals for increased funding to improve the health of the San Francisco Estuary.</p>  |  |
| <p>A. SB 375 implementation and reform</p>  | <p>In partnership with other metropolitan planning organizations and other stakeholders, explore potential updates to SB 375 (Steinberg, 2008) with the goal of focusing less on emission models and more on near term, ambitious but achievable actions that will reduce GHGs in partnership, rather than in competition, with the state.</p> <p>Explore an expansion in the scope of the Sustainable Communities Strategy (SCS) to incorporate climate adaptation, as well as other important regional and statewide objectives, such as affirmatively furthering fair housing, social equity, public health and economic development.</p> <p>Support legislation to increase the availability of funding at the regional level to help <i>implement</i> the SCS, as well as policy tools, such as roadway pricing, to reduce single-occupancy vehicle travel in a manner that ensures equitable policy outcomes.</p> <p>As part of SB 375 reform proposals, seek alignment of the timelines for the development of the SCS in the Bay Area-Sacramento-San Joaquin Valley megaregion to ensure coordination on forecasting assumptions, strategies, and investments to improve the movement of people and goods.</p> |

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| B. Electrifying the passenger vehicle fleet                          | Consistent with the state’s transportation electrification goals, support proposals to accelerate the purchase of zero-emission passenger and light-duty vehicles. <u>Support proposals to provide funding to help public agencies convert their light-duty diesel vehicles to clean diesel, where such conversions are cost-effective and compatible with the state’s overall zero-emission vehicle strategy.</u>   |
| C. State Route 37 improvements                                       | Support legislation in collaboration with Caltrans and the four north bay counties of Marin, Napa, Solano and Sonoma to authorize tolls on State Route 37 to help fund interim congestion relief and the long-term multi-modal reconstruction and resilience of the roadway.   |
| D. Increase the Bay Area’s preparedness for a major earthquake       | Monitor and support legislation aimed at improving the region’s seismic preparedness.  |
| E. Wildfire mitigation   | Monitor and support legislation aimed at protecting current and future Bay Area residents from wildfire risk.  |
| F. Climate adaptation  | <p>Seek state funding for regions and localities to invest in <u>planning</u>, projects and programs that will improve the Bay Area’s resilience to the impacts of climate change, including fire and sea level rise.</p> <p>Ensure that statewide climate adaptation legislation: 1) complements and builds upon existing local and regional agency capacity and local and regional planning processes and 2) uses the nine-county Bay Area as the geography for <i>regional</i> climate adaptation planning. As in Item 2C, advocate that any funding geared towards disadvantaged communities use a definition that includes low-income communities and households rather than relying exclusively on the state’s CalEnviroScreen method.</p> |
| <b>9. Safety:</b> Improve transportation system safety for all users |  |
| A. Zero traffic fatalities goal (Vision Zero)                        | Building on the <u><a href="#">recommendations of the Zero Traffic Fatalities Task Force</a></u> , support legislation aimed at achieving the Vision Zero goals of no roadway-related deaths or serious injuries by improving safety for all road users, including non-motorists. In particular, support modifying the state’s 85 <sup>th</sup> percentile methodology for determining speed limits to provide greater   |

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|  | flexibility to local agencies and continue to support authorization of automated speed enforcement technology to enforce speed limits.  |
| B. Passenger rail safety                 | Support efforts to increase passenger rail safety through increased funding for positive train control and other strategies to reduce risk.   |
| <b>10. Governance:</b> Brown Act Reforms | Monitor and engage in legislation, in coordination with other local agency associations and regional agencies, related to updating the Ralph M. Brown Act (Brown Act) to incorporate some of the increased flexibility provided for during COVID-19 into the long-term provisions of the Brown Act, particularly in relation to remote participation in meetings. |

| <b>Federal Advocacy Goals and Objectives</b>  |   |
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| <b>1. Transportation and Housing Funding:</b> Support robust federal investment in Bay Area transportation and housing infrastructure             |   |
| A. COVID-19 Emergency Aid and Economic Recovery   | Continue partnering with local, state, and national partners to advocate for federal aid to support state and local responses to the COVID-19 public health emergency, including advocating for state and local government funding, resources to backfill for lost transportation revenues, and emergency assistance to keep renters and homeowners housed. Support an economic recovery package that invests in sustainable transportation infrastructure, affordable housing, and climate adaptation.   |
| B. Fiscal Year 2022 transportation and housing programmatic appropriations  | Partner with local, regional and statewide transportation agencies as well as national stakeholders to ensure that Congress funds highway, transit and rail programs at no less than FAST Act-authorized levels. If Congress proposes to increase appropriations above FAST Act-authorized levels, seek to maximize Bay Area funding in revenue allocations. Additionally, work to defend federal affordable housing funds and programs, such as Section 8 housing vouchers, the HOME Investment Partnership Program and the Community Development Block Grant Program. |
| C. Advocate for discretionary transportation grant awards, including Capital Investment Grant funding for Resolution 3434/ Plan Bay Area Projects | Work with regional, state and national partners to advocate for implementation of the Capital Investment Grant (CIG) Program as authorized by the FAST Act. Support federal appropriations consistent with the full funding grant agreements approved for the Caltrain Peninsula Corridor Electrification and BART Transbay Core Capacity projects. Seek to advance through the CIG process the Bay Area's next generation of transit expansion projects, namely: BART to Silicon Valley Phase 2 and San Francisco Transbay Transit Center (Phase 2)/Downtown Extension |

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|   | (DTX). Support additional Bay Area transportation agency and transit operator efforts to secure discretionary funding for projects consistent with <i>Plan Bay Area 2050</i> .  |
| D. Housing production   | Support efforts to expand federal housing production tools, including the Low-Income Housing Tax Credit Program, California’s largest source of federal funding for new affordable housing.   |
| <b>2. Surface Transportation Reauthorization:</b> Engage in national deliberations prioritizing the funding and policy framework for the next surface transportation bill |   |
|   | <p>Work with our regional and national partners to support a long-term, fully funded transportation authorization that supports states and regions in achieving national goals related to infrastructure condition, safety, mobility, and air quality. Ensure that the next authorization bill retains discretion for MTC to invest funds in ways that further our region’s goals to improve equity, respond to a changing climate, and increase access to affordable, transit- and jobs-oriented housing. Also seek new resources to support climate adaptation and the deployment of new transportation technology to address the Bay Area’s mobility challenges.</p> <p>Working with our statewide and national partners, advocate for modifications to current law to facilitate congestion pricing, including cordon pricing and express lanes, on the federal aid highway system.</p> <p>MTC’s federal transportation advocacy efforts center around building on the progress made in the Fixing America’s Surface Transportation (FAST) Act, as follows:</p> <ol style="list-style-type: none"> <li>1. <b>Raise New Revenues &amp; Grow Existing Programs:</b> Raise revenues to restore Highway Trust Fund solvency and increase federal transportation investment. Grow core FAST Act-authorized surface transportation programs, which have proven effective in delivering essential funds to California and the Bay Area.</li> <li>2. <b>FAST Act Updates:</b> Within the FAST Act framework, grow federal support for transit and regional mobility solutions, update transit programs to reward Bay Area best practices, and expedite project delivery without harming the environment.</li> <li>3. <b>21<sup>st</sup> Century Challenges and Opportunities:</b> Establish the federal government as a strong partner in state and regional efforts to make transportation networks responsive to the changing climate and transformative transportation technologies. The next transportation bill should include significant new resources for metropolitan areas to invest in solutions to the myriad mobility and related challenges facing the Bay Area and metros nationwide.</li> </ol> |

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| <b>3. Climate Protection, Adaptation, Environmental Justice:</b> Advocate for a strong federal partner in the Bay Area’s efforts to improve air quality, reduce greenhouse gas (GHG) emissions, and make our communities and transportation networks resilient to a changing climate, especially in communities of concern that are most vulnerable to the impacts of climate change. Advocate for passage of legislation to improve the health of the San Francisco Estuary. |  |
| A. Climate change mitigation  | Advocate for the federal government to take bold action to reduce GHG emissions and limit the magnitude of the climate crisis. Join with our statewide partners to support restoring California’s authority to enforce an aggressive clean vehicle mandate and preserving the air quality and climate change laws and regulations—including California’s successful Cap and Trade program—needed to meet the state’s ambitious target of reducing GHG emissions to 40 percent below 1990 levels by 2030.   |
| B. Disaster mitigation and resilience   | Seek to secure resources for the Bay Area to invest in disaster mitigation and resilience, including investing in strategically placed green and grey infrastructure to protect our communities and residents that are most vulnerable to the adverse effects of climate change. Support a strong regional role in disaster mitigation and resilience planning.  |
| C. San Francisco Estuary  | Advocate for passage of legislation to reauthorize the National Estuary Program and increased funding aimed at improving the health and resilience of the San Francisco Estuary.   |
| <b>4. Transportation Innovation and Shared Mobility:</b> Support policies that enable technological innovations to improve mobility, including mobility on demand, while protecting the public’s interest.  |  |
| A. Automated and Connected Vehicles   | In partnership with Bay Area cities and counties, the business community, and state and national transportation organizations, engage in regulatory and legislative efforts related to facilitating the deployment of transformative transportation technologies with the goal of accelerating safety, mobility, environmental, equity and economic benefits associated with new mobility technologies, including application in the transit sector. With respect to connected vehicles and autonomous vehicles (CV/AV), continue to support policies that facilitate joint CV/AV deployment, including preservation of capacity in the 5.9 GHz spectrum band. Additionally, ensure strong federal vehicle safety standards while also preserving the ability of state and local agencies to continue to set policies governing the operation of vehicles on highways and local roads, regardless of whether they are driven autonomously or manually. |

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| B. Shared Mobility | Advocate for federal legislative and regulatory updates that support shared mobility options such as bike-share, shared rides, carpooling, and shared scooters. Support expanding pre-tax transportation fringe benefit eligibility to include shared mobility options. This change would support the now-permanent Bay Area Commuter Benefits program by expanding federal tax incentives utilize alternatives to single occupancy travel to commute to work. |
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# Metropolitan Transportation Commission

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## Legislation Details (With Text)

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|-----------------------|--|----------------------|---|----------------------|--|
| <b>File #:</b>        | 20-1693  | <b>Version:</b>      | 1 | <b>Name:</b>         |  |
| <b>Type:</b>          | Report   | <b>Status:</b>       |   | Informational        |  |
| <b>File created:</b>  | 11/5/2020  | <b>In control:</b>   |   | ABAG Executive Board |  |
| <b>On agenda:</b>     | 12/17/2020   | <b>Final action:</b> |   |                      |  |
| <b>Title:</b>         | RHNA Update in Advance of January 2021 Draft Methodology and Subregional Shares Action Items   |                      |   |                      |  |
|                       | Presentation highlighting comments received during the RHNA public comment period in October and November and spotlighting how potential RHNA allocations would change with data updates between the Plan Bay Area 2050 Draft Blueprint and Final Blueprint.   |                      |   |                      |  |
| <b>Sponsors:</b>      |  |                      |   |                      |  |
| <b>Indexes:</b>       |  |                      |   |                      |  |
| <b>Code sections:</b> |  |                      |   |                      |  |
| <b>Attachments:</b>   | <a href="#">Item 09a 1 Summary Sheet RHNA Update.pdf</a><br><a href="#">Item 09a 2 Attachment A RHNA Public Comment Summary.pdf</a><br><a href="#">Item 09a 3 Attachment B Reporter's Transcript of Proceedings Certified.pdf</a><br><a href="#">Item 09a 4 Attachment C Comments from Local Jurisdictions C.pdf</a><br><a href="#">Item 09a 5 Attachment D Comments from Individuals and Stakeholders C.pdf</a><br><a href="#">Item 09a 6 Attachment E RHNA Update Presentation.pdf</a> |                      |   |                      |  |

| Date | Ver. | Action By | Action | Result |
|------|------|-----------|--------|--------|
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### RHNA Update in Advance of January 2021 Draft Methodology and Subregional Shares Action Items

Presentation highlighting comments received during the RHNA public comment period in October and November and spotlighting how potential RHNA allocations would change with data updates between the Plan Bay Area 2050 Draft Blueprint and Final Blueprint.

Gillian Adams

Information



## Association of Bay Area Governments

### Executive Board

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December 17, 2020

Agenda Item 9.a.

#### Regional Housing Needs Allocation (RHNA) Update

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**Subject:** Presentation highlighting comments received during the public comment period about the Proposed RHNA Methodology and Draft Subregional Shares in October and November, as well as preliminary staff responses.

**Background:** The Regional Housing Needs Allocation (RHNA) is the state-mandated<sup>1</sup> process for allocating a share of the Regional Housing Need Determination (RHND) the Bay Area received from the California Department of Housing and Community Development (HCD)<sup>2</sup> to every local government in the Bay Area. The RHNA methodology is a formula that quantifies the number of housing units, separated into four income categories, that will be assigned to each city, town, and county in the region. The allocation must meet the statutory objectives identified in Housing Element Law<sup>3</sup> and be consistent with the forecasted development pattern from Plan Bay Area 2050.<sup>4</sup> Each local government must then update the Housing Element of its General Plan and its zoning to show how it can accommodate its RHNA allocation.

ABAG convened an ad hoc [Housing Methodology Committee](#) (HMC) from October 2019 to September 2020 to advise staff on the methodology for allocating a share of the region's total housing need to every local government in the Bay Area. The HMC included local elected officials and staff as well as regional stakeholders to facilitate sharing of diverse viewpoints across multiple sectors.<sup>5</sup> At its final meeting on September 18, the HMC voted to recommend **Option 8A: High Opportunity Areas Emphasis & Job Proximity** with the 2050 Households baseline allocation as the Proposed RHNA Methodology. On October 1, the ABAG Regional Planning Committee (RPC) voted to recommend this methodology for approval by the Executive Board, and the Board approved its release as the Proposed RHNA Methodology for public comment on October 15, 2020. Materials related to the Proposed RHNA Methodology have been posted on ABAG's website since October 24 (<https://abag.ca.gov/our-work/housing/rhna-regional-housing-needs-allocation>).

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<sup>1</sup> See California [Government Code Section 65584](#).

<sup>2</sup> In a [letter dated June 9, 2020](#), HCD provided ABAG with a total RHND of 441,176 units for the 2023-2031 RHNA.

<sup>3</sup> See [California Government Code Section 65584\(d\)](#).

<sup>4</sup> See [Government Code Section 65584.04\(m\)\(1\)](#).

<sup>5</sup> The HMC roster is available at [https://abag.ca.gov/sites/default/files/hmc\\_roster\\_06\\_16\\_2020\\_0.pdf](https://abag.ca.gov/sites/default/files/hmc_roster_06_16_2020_0.pdf).

## Association of Bay Area Governments

### Executive Board

December 17, 2020

Agenda Item 9.a.

#### Regional Housing Needs Allocation (RHNA) Update

Housing Element Law allows two or more neighboring jurisdictions to form a “subregion” to conduct a parallel RHNA process to allocate the subregion’s housing need among its members.<sup>6</sup> ABAG must assign each subregion a share of the Bay Area’s RHND, which represents the total number of units, by income category, the subregion must allocate to its member jurisdictions.

#### Issues:

##### **Public Comment Period for the Proposed RHNA Methodology and Draft Subregional Shares**

[California Government Code 65584.04 \(d\)](#) requires ABAG to hold a public comment period and conduct at least one public hearing to receive oral and written comments on the Proposed RHNA Methodology prior to adoption of the Draft RHNA Methodology. [California Government Code 65584.03 \(c\)](#) requires ABAG to hold a public comment period and conduct at least one public hearing to receive oral and written comments on the Draft Subregional Shares prior to adoption of the Final Subregional Shares.

The written public comment period for both began on October 25 and ended on November 27 per the Notice of Public Hearing published in newspapers and an ABAG press release. Additionally, ABAG held a public hearing at the November 12 RPC meeting, where 29 local government representatives, advocacy organizations, and members of the public provided oral comments on the Proposed RHNA Methodology. There were no comments made about the Draft Subregional Shares at the public hearing.

As of the close of the public comment period on November 27, ABAG has received 106 written comments on the proposed methodology from local government staff and elected officials, advocacy organizations, and members of the public. There were no comments received about the draft subregional shares.

**Attachment A** summarizes the major themes of the comments received. **Attachment B** is the public hearing transcript.

**Attachment C and D** are compilations of written comments.

#### Next Steps:

Staff will consider comments and will recommend any necessary adjustments for integration into the Draft RHNA Methodology, which is scheduled for release in the next week. The ABAG Regional Planning Committee will weigh in on the Draft Methodology and Final Subregional Shares at its meeting on

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<sup>6</sup> [Government Code Section 65584.03.](#)

**Association of Bay Area Governments**

**Executive Board**

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**December 17, 2020**

**Agenda Item 9.a.**

**Regional Housing Needs Allocation (RHNA) Update**

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January 14, 2021 and the ABAG Executive Board is slated to take action on the Draft RHNA Methodology and Final Subregional Shares at the January 21, 2021 meeting.

**Recommended Action:** Information

**Attachments:**

A. Memo – Summary of Comments Received

B. Public Hearing Transcript

C. Compilation of Public Comments Received: Local Jurisdictions

D. Compilation of Public Comments Received: Individuals and Stakeholders

E. Presentation

**Reviewed:**



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Therese W. McMillan

# REGIONAL HOUSING NEEDS ALLOCATION



TO: ABAG Executive Board

DATE: December 17, 2020

FR: Executive Director

RE: Summary of Comments Received During RHNA Public Comment Period

## Overview

The Regional Housing Needs Allocation (RHNA) is the state-mandated<sup>1</sup> process for allocating a share of the Regional Housing Need Determination (RHND) the Bay Area received from the California Department of Housing and Community Development (HCD)<sup>2</sup> to every local government in the Bay Area. The RHNA methodology is a formula that quantifies the number of housing units, separated into four income categories,<sup>3</sup> that will be assigned to each city, town, and county in the region. The allocation must meet the statutory objectives identified in Housing Element Law<sup>4</sup> and be consistent with the forecasted development pattern from Plan Bay Area 2050.<sup>5</sup> Each local government must then update the Housing Element of its General Plan and its zoning to show how it can accommodate its RHNA allocation.

ABAG convened an ad hoc [Housing Methodology Committee](#) (HMC) from October 2019 to September 2020 to advise staff on the methodology for allocating a share of the region's total housing need to every local government in the Bay Area. The HMC included local elected officials and staff as well as regional stakeholders to facilitate sharing of diverse viewpoints across multiple sectors.<sup>6</sup> At its final meeting on September 18<sup>th</sup>, the HMC voted to recommend **Option 8A: High Opportunity Areas Emphasis & Job Proximity** with the 2050 Households baseline allocation as the Proposed RHNA Methodology. On October 1, the ABAG Regional Planning Committee voted to recommend this methodology for approval by the Executive Board, and the Board approved its release as the Proposed RHNA Methodology for public comment on October 15, 2020. Materials related to the Proposed RHNA Methodology have been posted on ABAG's website since October 24 (<https://abag.ca.gov/our-work/housing/rhna-regional-housing-needs-allocation>).

<sup>1</sup> See California [Government Code Section 65584](#).

<sup>2</sup> In a [letter dated June 9, 2020](#), HCD provided ABAG with a total RHND of 441,176 units for the 2023-2031 RHNA.

<sup>3</sup> State law defines the following RHNA income categories:

- Very Low Income: households earning less than 50 percent of Area Median Income (AMI)
- Low Income: households earning 50 - 80 percent of AMI
- Moderate Income: households earning 80 - 120 percent of AMI
- Above Moderate Income: households earning 120 percent or more of AMI

<sup>4</sup> See [California Government Code Section 65584\(d\)](#).

<sup>5</sup> See [Government Code Section 65584.04\(m\)\(1\)](#).

<sup>6</sup> The HMC roster is available at [https://abag.ca.gov/sites/default/files/hmc\\_roster\\_06\\_16\\_2020\\_0.pdf](https://abag.ca.gov/sites/default/files/hmc_roster_06_16_2020_0.pdf).

### Public Comment Period for the Proposed RHNA Methodology

Housing Element Law requires ABAG to hold a public comment period and conduct at least one public hearing to receive oral and written comments on the Proposed RHNA Methodology<sup>7</sup> and Draft Subregional Shares<sup>8</sup> prior to adoption of the Draft RHNA Methodology and Final Subregional Shares. The written public comment period began on October 25 and ended on November 27 per the Notice of Public Hearing published in newspapers and an ABAG press release. Additionally, ABAG held a public hearing at the November 12 meeting of the Regional Planning Committee, where 29 local government representatives, advocacy organizations, and members of the public provided oral comments on the proposed methodology.

### Geographic Representation and Respondent Types for Comments Received

During the public comment period, ABAG received 106 written comments on the proposed RHNA methodology. These letters provided perspectives from over 200 local government staff and elected officials, advocacy organizations, and members of the public, as some letters represented multiple signatories. In total, 42 of ABAG's 109 jurisdictions were signatories on letters received during the public comment period. **Table 1** shows the number of written and oral comments received from advocacy organizations, members of the public, and various public agencies across the nine-county Bay Area.<sup>9</sup> ABAG received no comments on the Draft Subregional Shares.

*Table 1. Share of public comments received from different types of respondents*

| Type of Respondent            | Number of Letters Received | Number of Oral Comments from Public Hearing |
|-------------------------------|----------------------------|---|
| Public Agency – Alameda       | 5                          | 0   |
| Public Agency – Contra Costa  | 3                          | 0   |
| Public Agency – Marin         | 11                         | 1   |
| Public Agency – Napa          | 2                          | 0   |
| Public Agency – San Francisco | 0                          | 0   |
| Public Agency – San Mateo     | 11                         | 2   |
| Public Agency – Santa Clara   | 8                          | 2   |
| Public Agency – Solano        | 1                          | 0   |
| Public Agency – Sonoma        | 1                          | 0   |
| Advocacy Organizations        | 9                          | 8   |
| Members of the Public         | 57                         | 17  |

<sup>7</sup> [California Government Code 65584.04 \(d\)](#)

<sup>8</sup> [California Government Code 65584.03 \(c\)](#)

<sup>9</sup> The sum of the number of letters received in Table 1 exceeds 106, as two letters had signatories from public agencies across multiple counties. Similarly, the sum of the number of oral comments in Table 1 exceeds 29 because one of comments came from a special district that represents both San Mateo and Santa Clara Counties.

## Most Common Themes from Comments Received

**Table 2** below summarizes the key themes that are most prevalent across the comments received about the proposed RHNA methodology. The themes are ordered roughly in terms of how many letters and oral comments mentioned them, though it is worth noting that some letters represented comments from multiple jurisdictions, advocacy organizations, and/or individual members of the public. The table also includes a brief, preliminary response from ABAG staff to the different topics in the comment letters. Comment letters will receive a more specific response in the coming weeks, with responses to local jurisdictions slated prior to the January ABAG Executive Board meeting.

*Table 2. Most common themes from written comments received*

|  |
|--|
| <p><b>1. Jurisdiction is built out and/or lacks infrastructure to accommodate its allocation:</b> Comments noted a lack of developable land and the inability to provide the services and infrastructure that would be needed as a result of growth from RHNA. Some residents objected to any new housing growth.</p>  |
| <p><b>Preliminary ABAG Response:</b> Housing Element Law requires RHNA to increase the housing supply and mix of housing types for all jurisdictions. ABAG-MTC staff worked with local governments to gather information about local plans, zoning, physical characteristics and potential development opportunities and constraints. This information was used as an input into the Plan Bay Area 2050 Blueprint, which is used as the baseline allocation in the proposed RHNA methodology. The Blueprint allows additional feasible growth within the urban footprint by increasing allowable residential densities and expanding housing into select areas currently zoned for commercial and industrial uses. Ultimately, by law, ABAG cannot limit RHNA based on existing zoning or land use restrictions. The statute also requires ABAG to consider the potential for increased residential development under alternative zoning ordinances and land use restrictions.</p> |
| <p><b>2. The methodology should focus more on transit and jobs to better align with Plan Bay Area 2050 and the statutory RHNA objective to promote infill development and achieve greenhouse gas emissions reduction targets:</b> Comments suggested that proposed methodology directs too much RHNA to jurisdictions without adequate transit and/or with few jobs. These comments also argued that changing the RHNA methodology's baseline allocation to household growth from the Blueprint would better align the methodology with Plan Bay Area 2050 and statutory goals related to greenhouse gas emission reductions and sustainability.</p>   |
| <p><b>Preliminary ABAG Response:</b> The proposed RHNA methodology directly incorporates the forecasted development pattern from the Plan Bay Area 2050 Blueprint as the baseline allocation. The Blueprint emphasizes growth near job centers and in locations near transit, as well as in high-resource areas, with the intent of reducing greenhouse gas emissions. The strategies incorporated into the Blueprint help improve the region's jobs-housing balance, leading to shorter commutes—especially for low-income workers.</p> <p>The inclusion of job proximity by both automobile and transit as factors in the proposed RHNA methodology also furthers the RHNA objective related to efficient development</p>  |

patterns and greenhouse gas emission reductions by encouraging shorter commutes for all modes of travel. The job proximity factors allocate nearly half of the total number of housing units assigned to the Bay Area by the State. This includes allocating 15% of the region's lower-income units based on a jurisdiction's proximity to jobs that can be accessed by public transit.

Accordingly, the performance evaluation metrics indicate that the proposed RHNA methodology performs well in meeting all five of the RHNA statutory objectives. This analysis shows that the proposed methodology results in jurisdictions with the most access to jobs and transit as well as jurisdictions with the lowest vehicle miles traveled per resident experiencing higher growth rates from their RHNA allocations than other jurisdictions in the region. In contrast, the performance evaluation metrics also show that, while using Plan Bay Area 2050 household growth as the RHNA methodology's baseline performs marginally better on the RHNA objective related to reducing greenhouse gas emissions, it may fall short in achieving statutory requirements related to affirmatively furthering fair housing. Staff's analysis also indicates no consistency issues between the proposed RHNA methodology and 35-year housing growth from Plan Bay Area 2050 at the county and subcounty levels.

**3. Methodology needs to directly incorporate hazard risk:** Comments suggested the methodology allocated too much growth near areas with high wildfire risk and exposure to other natural hazards such as sea-level rise. Others felt the Blueprint needs to better incorporate hazard data, particularly related to wildland-urban interface (WUI) maps and FEMA floodways.

**Preliminary ABAG Response:** Including the Blueprint in the RHNA methodology addresses concerns about natural hazards, as the Blueprint excludes areas with unmitigated high hazard risk from Growth Geographies. The Blueprint Growth Geographies exclude CAL FIRE designated "Very High" fire severity areas as well as county-designated WUIs where applicable. The Blueprint strategies focus future growth away from the highest fire risk zones, support increased wildland management programs, and support residential building upgrades that reduce the likelihood for damage when fires occur in the wildland urban interface.

The Blueprint incorporates strategies to mitigate the impacts of sea level rise, protecting nearly all communities at risk from two feet of permanent inundation. Riverine flooding is not yet integrated into the Blueprint because existing research does not provide guidance on how to model impacts of temporary riverine flooding to buildings and land value. Communities can choose to take these risks into consideration with where and how they site future development, either limiting growth in areas of higher hazard or by increasing building standards to cope with the hazard.

**4. Support for proposed methodology:** Comments from residents, local jurisdictions, and a diverse range of advocacy organizations supporting the methodology emphasized its importance for furthering regional equity.

**Preliminary ABAG Response:** Staff's analysis aligns with these comments and indicates the proposed methodology successfully furthers all five of the statutory objectives of RHNA, including requirements related to affirmatively furthering fair housing.



**5. Need to account for impacts from COVID-19:** Comments generally focused on the effects of the pandemic and suggest either delaying RHNA or reconsidering the focus on proximity to jobs.

**Preliminary ABAG Response:** Staff appreciates concerns about the significant economic and societal changes resulting from COVID-19, and these concerns were relayed to the State in early summer. However, the Regional Housing Need Determination (RHND) from HCD has been finalized at this point in time. ABAG is obligated by state law to move forward with the RHNA process so jurisdictions can complete updates to their Housing Elements on time.

Additionally, the eight-year RHNA cycle (which starts in 2023) represents a longer-term outlook than the current impacts of the pandemic in 2020 and 2021. The potential impacts of the trend toward telecommuting in the longer term are incorporated into the RHNA methodology through the integration of the Plan Bay Area 2050 Blueprint, which includes strategies to expand commute trip reduction programs through telecommuting and other sustainable modes of travel.

**6. Concerns about allocation to unincorporated areas:** Comments argued that the methodology allocates too much growth to unincorporated areas that are rural and lack infrastructure to support development.

**Preliminary ABAG Response:** The Plan Bay Area 2050 Blueprint forecasts very little growth in unincorporated county areas, and that growth is focused inside urban growth boundaries. The RHNA allocations to these areas are driven, largely, by the number of existing households in unincorporated county areas, since the 2050 Households baseline in the proposed RHNA methodology is the sum of existing households and forecasted household growth. ABAG-MTC staff has engaged in dialogue with local government staff in the counties that have expressed concern about their potential RHNA allocations to unincorporated counties (Santa Clara, Solano and Sonoma), and staff continue to explore potential ways to address these concerns. It is also important to note that Housing Element Law includes provisions that allow a county to transfer a portion of its RHNA allocation to a city later in the RHNA process or if land is annexed after it receives its RHNA allocation from ABAG.<sup>10</sup>

**7. Support for adding the “equity adjustment” proposed by some HMC members to the methodology:** Comments were generally supportive of the methodology but noted the HMC-proposed equity adjustment should be included to advance the statutory requirement to affirmatively further fair housing.

**Preliminary ABAG Response:** Staff notes the importance of meeting all statutory requirements, including the mandate to affirmatively further fair housing. However, staff’s analysis indicates the proposed RHNA methodology does successfully achieve all five statutory objectives of RHNA. At the final HMC meeting, staff recommended that the HMC not move forward with the proposed equity adjustment as this change would increase the complexity of the methodology for minimal impact on RHNA allocations. The proposed equity adjustment would shift less than 2 percent of the region’s lower-income RHNA to the jurisdictions

<sup>10</sup> [Government Code Section 65584.07.](#)



identified by an HMC-proposed composite score as exhibiting above-average racial and socioeconomic exclusion. However, the underlying methodology for the composite score and adjustment approach would make it more difficult for local policy makers and members of the public to understand the RHNA methodology. Ultimately, the HMC chose not to move forward with the proposed equity adjustment in its recommended RHNA methodology.

**8. Concern that HCD's Regional RHND calculation was inaccurate and too high:**

Comments from several members of the public and one local jurisdiction expressed the belief that HCD's RHND calculations may have been flawed and resulted in ABAG receiving an allocation from the state that was too large.

**Preliminary ABAG Response:** The determination provided by HCD is based on a population forecast from the California Department of Finance (DOF), which is then modified by staff at DOF and HCD to tackle overcrowding and make other adjustments as specified in law. The procedures for calculating the RHND are clearly specified in state law and the grounds for an appeal were narrowly designed by the Legislature. ABAG staff have reviewed HCD's calculation methodology and believe it adheres to applicable legal requirements. The ABAG Board ultimately decided not to appeal the RHND in June 2020. At this time, the window of appeal of the RHND is now closed. Further feedback on this element of the process is most appropriately provided to HCD, rather than ABAG.

**9. Jurisdiction-specific issues with Plan Bay Area 2050 Blueprint:** Some jurisdictions had concerns about the accuracy of the Blueprint's underlying data.

**Preliminary ABAG Response:** Local jurisdiction staff were provided with several months to comment on the BASIS data used as the input for the Blueprint, as well as the additional public comment period on the Draft Blueprint during Summer 2020. ABAG-MTC staff appreciates jurisdictions' feedback on Blueprint data and has worked directly with local jurisdiction staff to address these concerns.

## Next Steps

Staff will consider comments and will recommend any necessary adjustments for integration into the Draft RHNA Methodology, which is scheduled for release in the next week. The ABAG Regional Planning Committee will consider the Draft RHNA Methodology and make a recommendation to the ABAG Executive Board at its meeting on January 14, 2021. The ABAG Executive Board is slated to take action on the Draft RHNA Methodology at the January 21, 2021 meeting.

After a Draft RHNA Methodology is adopted by the Executive Board, ABAG will submit the methodology to HCD for review and then use the state agency's feedback to develop a final methodology and draft RHNA allocation in spring 2021. Release of the draft allocation will be followed by an appeals period in the summer of 2021, with the final RHNA allocation assigned to each of the Bay Area's local governments in late 2021.

Page 1

ASSOCIATION OF BAY AREA GOVERNMENTS

REGIONAL PLANNING COMMITTEE

In Re:

REGIONAL HOUSING NEEDS ALLOCATION  
Public hearing on Regional Housing Needs  
Allocation (RHNA) Proposed Methodology

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**CERTIFIED  
TRANSCRIPT**

REPORTER'S TRANSCRIPT OF REMOTE PROCEEDINGS

Thursday, November 12, 2020

Taken before AMBER ABREU-PEIXOTO

Certified Shorthand Reporter No. 13546

State of California

## 1 A P P E A R A N C E S

2

## 3 MEMBERS:

4 KAREN MITCHOFF, Supervisor, County of Contra Costa, Chair

5 CARLOS ROMERO, Director, Urban Ecology-Equity, Vice Chair

6

7

## 8 COUNTY REPRESENTATIVES:

9 NATHAN MILEY

Supervisor, County of Alameda

10

SCOTT HAGGERTY

11 Supervisor, County of Alameda

12 KATIE RICE

Supervisor, County of Marin

13

RAFAEL MANDELMAN

14 Supervisor, City and County of San Francisco

15 CINDY CHAVEZ

Supervisor, County of Santa Clara

16

MONICA BROWN

17 Supervisor, County of Solano

18

## 19 CITIES REPRESENTATIVES:

20 MARILYN EZZY ASHCRAFT

Mayor, City of Alameda-Cities in Alameda County

21

JULIE PIERCE

22 Mayor, City of Clayton-Cities in Contra Costa

23 PAT EKLUND

Mayor Pro Tem, City of Novato-Cities in Marin County

24

SONJA TRAUSS

25 Office of the Mayor, City and County of San Francisco

## 1 CITIES REPRESENTATIVES (CONT'D):

2 RICK BONILLA

3 Councilmember, City of San Mateo-Cities in San Mateo  
County

4 NEYSA FLIGOR

5 Councilmember, City of Los Altos-Cities in Santa Clara  
County

6 LORI WILSON

7 Mayor, City of Suisun City-Cities in Solano County

8 SUSAN ADAMS, Councilmember, City of Rohnert Park-Cities in  
Sonoma County

9

## 10 SPECIFIED REPRESENTATIVES:

11 PAUL CAMPOS

12 Senior Vice President of Governmental Affairs, Building  
Industry Association of the Bay Area-Housing

13 KATHLEEN CHA

14 Member, League of Women Voters of the Bay Area-Public  
Interest

15 AMBER CRABBE

16 Public Policy Manager, San Francisco County Transportation  
Authority-Congestion Management Authority-Special District

17 RUSSELL HANCOCK

18 President and CEO, Joint Venture Silicon Valley-Business

19 MELISSA JONES

20 Executive Director, Bay Area Regional Health Inequalities  
Initiative-Public Health

21 MARK ROSS

22 Councilmember, City of Martinez-Bay Area Air Quality  
Management District

23 AL SAVAY

24 Community Development Director, City of San Carlos-Bay  
Area Planning Directors Association

25 JAMES SPERING

Supervisor, County of Solano-Metropolitan Transportation

1 SPECIFIED REPRESENTATIVES (CONT'D):

2

JESSE ARREGUIN

3 Mayor, City of Berkeley-President-Ex officio

4 DAVID RABBITT

5 Supervisor, County of Sonoma-Immediate Past President-Ex  
officio

6

7

8

9 STAFF:

DAVE VAUTIN

10 GILLIAN ADAMS

FRED CASTRO

11 MATTHEW LAVRINETTS

MATT MALONEY

12

13

PUBLIC COMMENTERS FOR AGENDA ITEM 5A:

14 SAMUEL MUNOZ

L.W. LAKINDER

15 REYLA GRABER

16

17

PUBLIC COMMENTERS FOR AGENDA ITEM 6A:

18

CLAYTON HOLSTINE

19 PAUL FOREMAN

JOSHUA HUGG

20 GREG SCHMID

AARON ECKHOUSE

21 AMANDA BROWN-STEVENSON

RODNEY NICKENS

22 PAUL KERMOYAN

SHAJUTI HOSSAIN

23 DERRICK SAGEHORN

JUSTINE MARCUS

24 ZARINA

VICTORIA FIERCE

25 KELSEY BANES

Page 5

1 PUBLIC COMMENTERS FOR AGENDA ITEM 6A (CONT'D):  
2 HECKTOR MALVIDO  
KEN CHAN  
3 VICKI PARKER  
SIDHARTH KAPUR  
4 JORDAN GRIMES  
SALIM  
5 DARRELL OWENS  
REYLA GRABRE  
6 DAM DEUTSCH  
KEVIN MA  
7 CHERIE L. JENSEN  
ROB NIELSEN  
8 ADAM BUCHBINDER  
JOANNA GUBMAN  
9 ZAC BOWLING

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Page 6

1 Thursday, November 12, 2020 1:34 p.m.

2

3 BE IT REMEMBERED that pursuant to Notice of Public  
4 Hearing, and on Thursday, November 12, 2020, commencing  
5 at the hour of 1:34 p.m., remotely via webcast,  
6 teleconference and Zoom, in the Bay Area Metro Center,  
7 before me, AMBER ABREU-PEIXOTO, CSR No. 13546, a Certified  
8 Shorthand Reporter in and for the State of California,  
9 there commenced a public hearing.

10

11 ---o0o---

12

13

14 P R O C E E D I N G S

15

16 (PUBLIC COMMENT ON AGENDA ITEM 5A)

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18 CHAIR MITCHOFF: Okay. Then we will go to public  
19 comment.

20 Are there any members of the public who wish to  
21 comment on this report?

22 COMMITTEE MEMBER ASHCRAFT: I believe we have a  
23 member with his hand up.

24 CHAIR MITCHOFF: Oh. I --

25 COMMITTEE MEMBER SAVAY: Sorry about that, Madam

1 Chair.

2 So I had a question. With regard to changing  
3 the -- you know, significant changes that were  
4 un-forecasted when the Plan is put together, do you have  
5 capability to shift, in terms of priorities and  
6 implementation, based on significant changes, like the  
7 pandemic response that could ripple through the economy in  
8 the Bay Area for years to come?

9 MR. VAUTIN: That's a great question.

10 So, first of all, I'll note that the Blueprint  
11 phase that we've been working on since last fall, we've  
12 actually incorporated a number of different changes to it  
13 because we made refinements to it during the course of the  
14 pandemic. So a lot of the strategies were updated or  
15 revised this summer, again, taking into account what we  
16 know, and also what we don't know about the region's  
17 future. But we were able to incorporate some of those  
18 learnings into the Final Blueprint.

19 Furthermore, the Regional Birth Forecast was  
20 updated to include COVID impacts and recession impacts  
21 into the region's long-term trajectory. And we worked  
22 closely with the state to incorporate a faster adoption  
23 rate of telecommuting than previously envisioned. So  
24 there's been some specific actions.

25 At the same time, this Implementation Plan phase



1 is another chance to think about, what are the key  
2 priorities for the next five years? A time period that  
3 will be much more heavily defined by COVID and the  
4 after-effects of it, including a weaker economy.

5 And so as we think about prioritizing which  
6 strategies need to come first, I think that lens, along  
7 with our equity lens and some other key areas to look  
8 at -- that lens is going to be really important.

9 And so, you know, we'll be encouraging  
10 stakeholders, as we think about what's essential for 2021,  
11 2022, et cetera, to keep that in mind.

12 COMMITTEE MEMBER SAVAY: And just (inaudible)  
13 really quickly, have you -- in light of that response,  
14 have you talked to some experts, in terms of forecasting  
15 our futures, and things like that?

16 You're asking what stakeholder should we talk to.  
17 Have you talked to some experts or academics or others, in  
18 terms of looking for the future, in terms of how it  
19 relates to the implementation?

20 MR. VAUTIN: Well, we're just at the -- we just  
21 kicked off the Implementation Plan phase this month.

22 But I think your suggestion is well-taken that we  
23 can look to engage some folks in academia or think-tanks  
24 in this process.

25 COMMITTEE MEMBER SAVAY: Thank you.

1 CHAIR MITCHOFF: Okay. I know there's members of  
2 the public who wish to speak. But I'm not seeing anybody  
3 else in the committee who wishes to speak. All right.

4 Would -- Mr. Castro, would you call on our first  
5 public speaker?

6 MR. CASTRO: Yes. Our first speaker is Samuel  
7 Munoz.

8 Please un-mute yourself and go ahead.

9 MR. MUNOZ: All right. Can you hear me?

10 MR. CASTRO: Yes, sir.

11 MR. MUNOZ: Okay. Good afternoon, Madam Chair,  
12 and committee members and staff.

13 A 2020 survey of the Bay Area local governments  
14 asked to identify major barriers producing all the housing  
15 the region needs. Shortages of skilled housing  
16 construction workers was one of the top responses.

17 The Northern California Carpenters doesn't expect  
18 ABAG and the MTC to design expanded training programs, but  
19 the Bay Area 2050 Implementation Plan can help guide  
20 jurisdictions towards best practices for local government  
21 agencies and private developers, creating incentives for  
22 developers and contractors to make concrete commitments to  
23 recruiting, training, and retaining skilled construction  
24 workers.

25 The Northern California Carpenters stand ready to

1 assist staff in developing a work plan for identifying and  
2 proliferating those best practices.

3 Thank you.

4 CHAIR MITCHOFF: Thank you.

5 Is there anyone else who wishes to address us?

6 MR. CASTRO: Yes. We have one speaker with the  
7 initials "L.W."

8 Go ahead.

9 L.W.: Yeah. Hi. Can you hear me?

10 MR. CASTRO: Yes, sir.

11 CHAIR MITCHOFF: Yes.

12 L.W.: Hi. My name is Lakinder, and I'm looking  
13 at your strategy document.

14 I'm sorry. I haven't looked at your past  
15 documents, but if the idea was to present a comprehensive  
16 background as to how you came to this strategy, then I am  
17 not so well-informed.

18 And I was wondering, just having couple of slides  
19 is okay. But having a lot more detailed input as to what  
20 the cities have -- member cities have -- who are  
21 participating, given you as input, that would be good to  
22 see. But I don't have any idea what's the background  
23 here.

24 So thank you.

25 CHAIR MITCHOFF: Thank you.

1           Is there anyone else in the public who wishes to  
2   address us? Do you see --

3           MR. CASTRO: There's one more person. Reyla  
4   Graber?

5           CHAIR MITCHOFF: Ms. Graber?

6           MR. CASTRO: Reyla Graber, please un-mute  
7   yourself.

8           Reyla Graber? She does not seem to be -- the  
9   person is not --

10          REYLA GRABER: Can you hear me?

11          MR. CASTRO: Okay. Go ahead.

12          REYLA GRABER: Can you hear me?

13          CHAIR MITCHOFF: Yes.

14          MR. CASTRO: Go ahead.

15          REYLA GRABER: Okay. Thank you.

16          I'm going to read off a letter to you from an  
17   Edward Singh, who also lives in Alameda. I'm from  
18   Alameda.

19          CHAIR MITCHOFF: Ms. Graber, I want to make sure.  
20   I'm going to be limiting public comment to three minutes.

21          Is the letter longer than three minutes?

22          REYLA GRABER: No. No. Uh-huh. I don't believe  
23   so. One page. One type-written page.

24          Dear Regional Planning Committee, Chairperson  
25   Mitchoff, and committee members. Okay. One concern that

1       arose during discussions of the recently-defeated Measure  
2       Z in Alameda, "Z" would have removed voter-approved  
3       development restrictions in Alameda, and it was defeated,  
4       is the susceptibility of Alameda to multiple natural  
5       hazards; earthquakes, liquefaction, sea level rise,  
6       tsunami surges.

7               Although these hazards exist for many cities  
8       adjacent to San Francisco bay, Alameda is unique, in that  
9       the egress from Alameda, should such natural hazards  
10      occur, an emergency response active to the city to the  
11      island is limited to aging bridges and tunnels, which are  
12      already overwhelmed during normal rush-hour conditions.

13              Adding RHNA, 4,900 housing units in the period  
14      from 2023 to 2030, would require building another 13,000,  
15      approximate, market-rate units in order to achieve the  
16      RHNA target for affordable homes.

17              This would increase the total number of housing  
18      units in Alameda by over 30 percent, approximately,  
19      burdening an already-stressed infrastructure, as well as  
20      exasperating ingress onto and egress off of the island  
21      during emergency conditions.

22              Such concerns should be reflected in the process  
23      of determining RHNA requirements --

24              MR. CASTRO:   Ms. Graber --

25              CHAIR MITCHOFF:   Ms. Graber, you're addressing us

1 on an item that we haven't gotten to yet.

2 Can you wrap up your comment, please?

3 Ms. Graber, you're back on mute.

4 REYLA GRABER: Okay. Can you hear me now?

5 CHAIR MITCHOFF: Yes. You're addressing us on an  
6 item that -- this is not the item where you should be  
7 addressing it. I am asking if you can wrap up your  
8 comment, please.

9 REYLA GRABER: Okay. Well, I'll finish it when  
10 you come to the item, then. I'll finish it when you come  
11 to the proper item. I'm sorry.

12 CHAIR MITCHOFF: Thank you.

13 Is there anyone else who wishes to address us on  
14 this item?

15 MR. CASTRO: There are no others with their hands  
16 raised from the attendees, and no written comments were  
17 received for this item.

18

19 (PUBLIC COMMENT ON AGENDA ITEM 6A)

20

21 CHAIR MITCHOFF: Okay. Then we are moving on to  
22 item 6A. And I have -- my phone keeps going out here.

23 Okay. We will now conduct the public hearing.  
24 This is item 6A, the public hearing on Regional Housing  
25 Needs Allocation Proposed Methodology.

1           We will now conduct the public hearing on the  
2   Regional Housing Needs Allocation Proposed Methodology.

3           Is the court reporter ready?

4           THE REPORTER: I am here and ready. Thank you.

5           CHAIR MITCHOFF: Wonderful. Thank you.

6           The public hearing is now open. Good afternoon.

7   I am Karen Mitchoff, Chair of the Regional Planning  
8   Committee for the Association of Bay Area Governments,  
9   also known as the ABAG RPC.

10           I would like to take up Agenda Item 6A, the  
11   public hearing on the proposed methodology for RHNA. The  
12   hearing is now open.

13           And as you heard, a Certified Shorthand Reporter  
14   is transcribing these proceedings. If you wish to  
15   testify, please use the "Raise Hand" feature, or dial star  
16   9, and please wait to be called upon.

17           We ask that each speaker be brief and concise and  
18   keep their comments to no more than three minutes. If a  
19   previous speaker has addressed your concern, you may just  
20   -- we would ask that you just say that you reiterate those  
21   comments, rather than repeating them.

22           By way of background, ABAG convened an ad hoc  
23   Housing Methodology Committee, also known as the HMC, over  
24   the last year, to advise staff on the methodology for  
25   allocating a share of the region's total housing need to

1 every local government in the Bay Area. I think this  
2 answers the question from a previous public speaker about  
3 whether the cities were involved.

4 On October 15th, the ABAG regional -- pardon me  
5 -- Executive Board voted to approve release of the  
6 proposed methodology for public comment. A report on the  
7 proposed RHNA methodology was posted on ABAG's website  
8 beginning on April -- April -- October 24th, 2020.

9 Also in late October, legal notices were  
10 published in multiple languages in newspapers, in each of  
11 the nine counties of the Bay Area, announcing the opening  
12 of a 30-day public comment period for written comment  
13 ending November 27th, and identifying today's public  
14 hearing to receive oral testimony and written comments  
15 about the proposed RHNA methodology. Today's hearing  
16 fulfills the requirement identified in California  
17 Government Code Section 65584.04, Parentheses D, close  
18 parentheses.

19 Written comments can continue to be submitted to  
20 RHNA@BayAreaMetro.gov or by U.S. Mail until the November  
21 27th deadline.

22 I'm going to call on Gillian Adams, who will give  
23 us a report on this. Ms. Adams, would you please give  
24 your report.

25 MS. ADAMS: Thank you, Madam Chair. My name is



1 Gillian Adams. I'm the project manager for the Regional  
2 Housing Needs Allocation or RHNA process. I'll be  
3 providing you with a brief overview of the Proposed RHNA  
4 Methodology approved by the ABAG Executive Board.

5 Could we call up the slides, please.

6 Okay. Next slide, please.

7 So RHNA is the state-mandated process to identify  
8 the share of the region's housing need that each local  
9 jurisdiction must plan for over an eight-year period.

10 As part of this process, in June 2020, the  
11 California Department of Housing and Community  
12 Developments determined that Bay Area communities must  
13 plan for 441,176 housing units from 2023 to 2031.

14 By law, ABAG is required to develop a methodology  
15 or formula that divides the entire housing need from the  
16 state among each city, town, and county in the region.  
17 Each local government will receive a total number of units  
18 by income category from ABAG and then must update the  
19 housing element of its General Plan to show how it can  
20 accommodate its RHNA allocation. It is in the (brief  
21 interruption) that local jurisdictions choose the specific  
22 locations within their communities that will be zoned for  
23 housing.

24 As noted earlier, ABAG convened an ad hoc Housing  
25 Methodology Committee, or HMC, to advise staff on the RHNA

1 methodology. The HMC was made up of local elected  
2 officials and staff, representing jurisdictions in every  
3 Bay Area county, and stakeholders from multiple sectors,  
4 to facilitate sharing of different perspectives.

5           The HMC met 12 times, from October 2019 to  
6 September 2020, and engaged in robust discussions about  
7 how to develop a methodology that advances the five  
8 objectives required by housing element law, and is  
9 consistent with the forecasted development pattern from  
10 Plan Bay Area 2050, as required by law.

11           The five statutory advances for RHNA relate to  
12 increasing housing supply and mix of housing types,  
13 promoting in-fill development and socioeconomic equity,  
14 promoting an improved intraregional jobs-housing  
15 relationship, balancing disproportionate household income  
16 distributions, and affirmatively furthering fair housing.

17           Throughout the methodology to development  
18 process, both staff's recommendations and the HMC's  
19 decisions were guided by performance evaluation metrics  
20 that assessed how successfully different methodology  
21 options achieved the statutory objectives. These metrics  
22 were based primarily on how state HCD evaluated other  
23 region's methodologies.

24           The results of the evaluations demonstrate that  
25 the proposed RHNA methodology advances the statutory RHNA

1 objectives and is consistent with Plan Bay Area 2050.

2 On October 15th, the ABAG Executive Board voted  
3 to release the proposed methodology for public comment.  
4 ABAG will be accepting written comments until noon on  
5 November 27th.

6 Next slide, please.

7 There are two primary components of the proposed  
8 RHNA methodology. The first is the baseline allocation,  
9 and the second is factors and weights.

10 The baseline allocation is used to assign each  
11 jurisdiction a beginning share of the region's housing  
12 needs. The proposed RHNA methodology uses a  
13 jurisdiction's share of the forecasted number of total  
14 households in the year 2050 from the Plan Bay Area 2050  
15 Blueprint of the baseline allocation. The HMC considered  
16 five different options for the baseline, including  
17 expected household growth from the Blueprint and existing  
18 households.

19 Using households in 2050 as the baseline captures  
20 the benefits of using the Plan Bay Area 2050 Blueprint in  
21 the RHNA methodology. And because total households in  
22 2050 is the sum of existing households, plus expected  
23 growth, it provides a compromise between using a baseline  
24 based on the current number of households in the  
25 jurisdiction, and a baseline based solely on forecasted

1 housing growth from the Blueprint.

2 The second component of the methodology was  
3 selecting the factors and weights that best complement the  
4 baseline allocation. The factors and weights adjust a  
5 jurisdiction's baseline allocation up or down.

6 The proposed methodology includes one set of  
7 factors and weights for allocating very low and low income  
8 units, and a second set of factors and weights for  
9 allocating moderate and above-moderate units.

10 This approach allows for more fine-raised control  
11 over allocations for a particular income category. The  
12 numbers of units allocated to each jurisdictions, using  
13 these two formulas, are added together to determine that  
14 jurisdiction's total allocation.

15 The table at the bottom of this slide shows the  
16 factors and weights for the proposed RHNA methodology.  
17 Each factor represents data related to the methodology's  
18 policy priority, access to high-opportunity areas, and  
19 proximity to jobs.

20 The access to high-opportunity areas' factor is  
21 based on the jurisdictions with a higher percentage of  
22 households living in areas designated "High Resource" or  
23 "Highest Resource" on the opportunity map developed by the  
24 state. The state evaluated census tracts using an index  
25 of 21 different indicators related to economic,

1 educational, and house outcomes.

2           The job proximity factors identify the number of  
3 jobs that can be accessed from a jurisdiction by a  
4 30-minute auto commute or a 45-minute transit commute. A  
5 factor's effect on the jurisdiction's allocation depends  
6 on how the jurisdiction scores on the factor, relative to  
7 other jurisdictions in the region.

8           A jurisdiction with an above-average score on a  
9 factor would get an upwards adjustment; whereas, a city  
10 with a below-average score on a factor would get a  
11 downwards adjustment, relative to the baseline allocation.

12           The percentages in the table show the weights  
13 assigned to each factor selected for the different income  
14 groups. The weight assigned to each factor represents the  
15 factor's relative importance in the overall allocation, as  
16 the weight determines the share of the region's housing  
17 need that will be assigned by that particular factor.

18           Next slide, please.

19           As mentioned earlier, the proposed RHNA  
20 methodology uses year 2050 households from the Plan Bay  
21 Area 2050 Blueprint as the baseline allocation. This  
22 slide reviews some of the benefits of using Plan Bay Area  
23 as part of the RHNA methodology.

24           Importantly, incorporating Plan Bay Area 2050  
25 into the RHNA methodology communicates to our local

1 government partners and other stakeholders that we are  
2 moving toward a unified vision for the Bay Area's future.

3 Including the Blueprint in the methodology helps  
4 ensure the RHNA allocation advances both the equity and  
5 sustainability outcomes identified in Plan Bay Area 2050,  
6 particularly those related to greenhouse gas emission  
7 reductions.

8 The growth geographies identified in the  
9 Blueprint prioritize housing development in areas near  
10 transit, locations close to existing job centers, and high  
11 resource areas. Using the Blueprint in the RHNA  
12 methodology, all -- can you go back to slide number four,  
13 please?

14 Thank you.

15 Using the Blueprint in the RHNA methodology also  
16 addresses concerns about natural hazards, as the growth  
17 geographies in the Blueprint exclude areas with high  
18 wildfire risk and areas outside urban growth boundaries.

19 Local governments can also consider the most  
20 appropriate places for planning for housing in areas with  
21 less risk from wildfires and other hazards when they  
22 update the housing elements of their general plans.

23 Using the year 2050 Households Baseline results  
24 in an allocation that reflects the Blueprint's focused  
25 growth pattern, while the allocation factors in the RHNA

1 methodology adjust this baseline to meet the fair housing  
2 and equity goals mandated by state law.

3 As a result, the proposed methodology will enable  
4 the region to accelerate toward a more equitable and less  
5 segregated land use pattern in the near term, while  
6 building toward the broader range of positive outcomes  
7 from the Blueprint in the long term.

8 It's important to note that in September the ABAG  
9 Executive Board and MTC Commission adopted changes to key  
10 inputs into the Plan Bay Area 2050 Blueprint. Since the  
11 Blueprint is part of the RHNA methodology, the Final  
12 Blueprint growth pattern, which is slated for release in  
13 December 2020, will affect the RHNA allocations.

14 Next slide, please.

15 This graphic provides an overview of the proposed  
16 RHNA methodology. At the top, you can see the regional  
17 housing need determination of 441,176 units by income  
18 category the state HCD identified for the Bay Area. In  
19 step one, you can see that the very low and low-income  
20 units have been grouped together, and the moderate and  
21 above-moderate income units have been grouped together.

22 Step two shows the proposed allocation factors  
23 and weights. The proposed RHNA methodology uses one group  
24 of factors and weights to allocate very low and low-income  
25 units, while another set of factors and weights allocates

1 moderate and above-moderate income units.

2           The graphic shows the weight assigned to each  
3 factor and a resulting number of units allocated by each  
4 factor. The three factors for allocating lower income  
5 units are 70 percent access to high-opportunity areas,  
6 which allocates around 126,000 units; 15 percent Job  
7 Proximity-Auto, which allocates around 27,000 units; and  
8 15 percent of Job Proximity-Transit, which allocates  
9 another 27,000 units.

10           The two factors used to allocate higher income  
11 units are 40 percent access to high-opportunity areas,  
12 which allocates about 104,000 units; and 60 percent Job  
13 Proximity-Auto, which allocates around 156,000 units.

14           In total, the access to High-Opportunity Areas  
15 factor allocates 52 percent of the region's RHNA, while  
16 factors related to job proximity allocate 48 percent of  
17 units.

18           In step three of the methodology, each  
19 jurisdiction's baseline allocation is adjusted based on  
20 how it scores on the different allocation factors. If its  
21 jurisdiction has more access to opportunity or better job  
22 proximity relative to the region, its allocation is  
23 adjusted upward. Otherwise, its allocation is adjusted  
24 downward.

25           The units the jurisdictions receive for the



1 different income groups are added together to determine  
2 the jurisdiction's total RHNA allocation.

3 Next slide, please.

4 As noted earlier, the potential allocation shown  
5 in these materials are just illustrative at this point.  
6 There are many more steps in the RHNA process before  
7 jurisdictions will receive the final allocation that needs  
8 to be incorporated into their housing element updates.

9 The map on the left illustrates the potential  
10 growth rate that each jurisdiction would experience as a  
11 result of the total allocation from the proposed  
12 methodology. This growth is relative to the  
13 jurisdiction's number of households in 2019.

14 Jurisdictions with the darkest brown experience  
15 the highest growth rates, while those in the light gray  
16 experience the lowest growth rates.

17 In general, the jurisdictions with the highest  
18 growth rates are in the south bay and along the peninsula.  
19 And those with the lowest growth rates are in Sonoma,  
20 Napa, and Solano counties, and the northern and eastern  
21 portions of Contra Costa County.

22 It's important to note that the region as a whole  
23 will grow by 16 percent as a result of the regional  
24 housing need assigned by HCD for the 2023 to 2031 RHNA  
25 cycle. Therefore, any jurisdiction that receives less

1     than a 16 percent growth rate is being asked to take on  
2     less housing than the regional average.

3             The fact that you see a lot of jurisdictions  
4     highlighted here speaks to the overall higher housing  
5     needs' number of 441,000 the Bay Area was planned for, and  
6     a statutory requirement to RHNA that all communities  
7     throughout the region do their fair share toward meeting  
8     the region's housing needs.

9             The map on the right shows the potential total  
10    allocation of RHNA units to Bay Area jurisdictions for the  
11    RHNA cycle as a result of the proposed methodology.

12            Jurisdictions with the darkest purple received  
13    the largest total allocations, while those in light gray  
14    received smaller allocations of RHNA.

15            The distribution of RHNA is fairly concentrated  
16    with the three largest cities receiving by far the largest  
17    allocation, accounting for more than one third of all RHNA  
18    units. The 25 jurisdictions with the highest RHNA  
19    allocations from the proposed methodology would account  
20    for 72 percent of all RHNA units.

21            Outside of the three largest cities, the largest  
22    RHNA allocations are mostly found in Silicon Valley, where  
23    there's both proximity to major employment centers and  
24    high access to opportunity.

25            Next slide, please.

1           This table shows how RHNA units are distributed  
2 by county. The numbers in the first column represent the  
3 sum of the RHNA allocations for all of the jurisdictions  
4 in each county.

5           In the second column you can see each county's  
6 share of RHNA units based on the proposed methodology.  
7 You can compare how the share of RHNA units for each  
8 county compares to its share of RHNA units in the last  
9 cycle in the middle column; its share of existing  
10 households; and its share of existing jobs.

11           San Francisco and jurisdictions in Marin, San  
12 Mateo, and Santa Clara counties would receive a larger  
13 share of the region's housing need than they did in the  
14 2015 to 2023 RHNA cycle.

15           Jurisdictions in Alameda, Contra Costa, and  
16 Solano counties receive a smaller share of the region's  
17 RHNA from the proposed methodology than they did from the  
18 Cycle 5 methodology, while the share of the allocation to  
19 jurisdictions in Sonoma and Napa counties remains  
20 unchanged.

21           When comparing the share of RHNA units from the  
22 proposed methodology to the county's share of existing  
23 households, only San Francisco and jurisdictions in San  
24 Mateo and Santa Clara receive a larger share of the  
25 region's RHNA compared to their current share of the

1 region's households.

2 When looking at jobs, only Santa Clara and San  
3 Mateo counties are being asked to take on a share of RHNA  
4 units that is larger than their share of existing jobs.  
5 The allocations from the proposed RHNA methodology would  
6 result in jurisdictions in Santa Clara county receiving 33  
7 percent of the RHNA, compared to its share of existing  
8 jobs of 27 percent.

9 Next slide, please.

10 So looking at the next steps for the RHNA  
11 process, ABAG is accepting written comments on the  
12 proposed methodology until noon on November 27th.

13 And I notice here that there's a typo on our  
14 slide. It should say that the public comment period on  
15 the proposed methodology and draft subregion share ends on  
16 November 27th.

17 In December of 2020, the Plan Bay Area 2050 Final  
18 Blueprint data for the 2050 household baseline is  
19 anticipated to become available.

20 In January of 2021, the RPC and the Executive  
21 Board will weigh in on public feedback, as well as updates  
22 made to integrate the Final Blueprint data into the draft  
23 RHNA methodology. Once the ABAG Executive Board approves  
24 the draft RHNA methodology, it will be submitted to state  
25 HCD for its review.

1           And that completes my presentation.

2           CHAIR MITCHOFF: Thank you. And I appreciate you  
3 noting the typo.

4           Since this will be on our website, I would  
5 request that someone go through and correct that before  
6 its posted again.

7           Okay. We will now receive oral -- or pardon me.

8           Are there any comments by any members of our  
9 committee before we go to public testimony? Is there  
10 anyone?

11           COMMITTEE MEMBER PIERCE: Yes. Sorry. I  
12 couldn't get un-muted.

13           CHAIR MITCHOFF: Okay. Go ahead.

14           COMMITTEE MEMBER PIERCE: Yeah. I just want to  
15 make a brief comment. And, first, I really want to  
16 reiterate my thanks to the staff and all of the committee  
17 members for the Housing Methodology Committee who spent  
18 the past year getting us this far. It has been a  
19 monumental lift.

20           But I have to say, I'm not happy with the  
21 results. And this is not a surprise to staff. I've said  
22 this at meetings before. I think we're going to have to  
23 agree to disagree. But I'm afraid that none of the  
24 options that remained on the table at the end of the  
25 process really adhere to the stated goal to align with

1 Plan Bay Area 2050. The greenhouse gas and vehicle  
2 miles-traveled targets are going to be nearly impossible  
3 to reach, no matter how many people we have telecommuting.

4 Proximity to jobs by auto and transit should be  
5 the heaviest criteria for where new housing should go.  
6 The quality of life for our workers is severely impacted  
7 by spending many hours a day commuting. Families and  
8 communities both suffer when residents cannot participate.

9 The proposed methodology, that is before the  
10 public today, in this public hearing, has dramatically  
11 increased the housing allocations to the unincorporated  
12 areas of the region, outside of urban growth boundaries  
13 that were approved by voters, and many of those areas are  
14 also high-hazard areas. Indeed, much of the Bay Area is a  
15 high-hazard area at this point.

16 It has also dramatically increased the  
17 allocations to small communities that are further from  
18 high-quality transit and job centers, rather than a  
19 previous option that was aligned closely with Plan Bay  
20 Area 2050 growth.

21 During the process, I have frequently heard the  
22 charge that some jurisdictions have not done their "fair  
23 share," and that they should be forced to carry their  
24 weight and even punished with higher numbers. In this  
25 current housing cycle, Cycle 5, every one of our 101

1 cities and nine counties have HCD-certified housing  
2 elements, which -- where they have identified locations  
3 for the housing units they've been allocated. Many, many  
4 factors go into why those units have not been built. We  
5 all know what those are.

6 I have further heard that for equity reasons, the  
7 new housing needs to be placed heavily in high-opportunity  
8 areas. I don't disagree with that at all. But since  
9 we're going to be building thousands of new homes in the  
10 -- in this plan, and new homes near jobs, wouldn't it make  
11 sense for us to focus some of the resources into making  
12 those areas become high-opportunity areas?

13 The existing high-opportunity areas do not have  
14 the capacity to absorb all of this growth. And a  
15 high-opportunity area that is a two-hour commute from jobs  
16 does not produce a high-quality life for our families.

17 We heard at ABAG that the estimated cost of  
18 realizing Plan Bay Area 2050 is \$1.4 trillion. At least  
19 part of that should go to improving opportunities close to  
20 the jobs, not in the far-flung suburbs from where those  
21 are located.

22 If we genuinely want to align RHNA and future  
23 growth with Plan Bay Area 2050, to accomplish the goals  
24 that it sets out, then we propose focusing new housing in  
25 the areas that are currently big job centers, which are

1     sorely lacking in existing housing, and are projected to  
2     grow their jobs by over 40 percent over what we have  
3     today. It only makes sense that the commensurate housing,  
4     plus more to make up for the backlog, be located near  
5     those jobs.

6             Again, I sincerely appreciate the work that all  
7     of the staff have done, all of the people on the Housing  
8     Methodology Committee put in. This year with COVID and  
9     everything has made for a pretty convoluted process. But  
10    I think it's just really important that we think twice  
11    about this.

12            We're not required to put the houses near the  
13    jobs, but continuing on the same path we've done for the  
14    last many, many years, doesn't make sense.

15            So I already voted no on this at ABAG. I would  
16    again, if we were voting today.

17            Thank you.

18            CHAIR MITCHOFF: Thank you.

19            Are there any other members of the committee who  
20    wish to make a comment before we go to public testimony?

21            COMMITTEE MEMBER EKLUND: Pat Eklund. I had  
22    raised my hand, Chair Mitchoff.

23            CHAIR MITCHOFF: Oh, go ahead, Pat. I'm sorry.  
24    I didn't see that.

25            COMMITTEE MEMBER EKLUND: Okay. I don't have a



1 question. I was going to make a comment.

2 And I also agree with Director Pierce about the  
3 methodology. I believe that the increase of the housing  
4 allocations to communities in Marin and other areas are  
5 higher -- actually allowed for than in our own general  
6 plan.

7 So right off the bat, ABAG is putting those  
8 cities and counties that -- that have a higher allocation  
9 than was in their General Plan, so they're already being  
10 set up for failure, in my opinion.

11 Also, the increased housing allocations to areas  
12 that don't have the jobs, nor the high-quality transit,  
13 which means the 15-minute head-ways, is going to increase  
14 greenhouse gas emissions; therefore, taking us further  
15 away from the 19 percent goal of greenhouse gas reductions  
16 in Plan Bay Area. So we're going to be exasperating what  
17 we're trying to help.

18 And then, lastly, I think that this methodology  
19 does not respect the high fire hazards and all aspects of  
20 sea level rise and effective climate change, which means  
21 increased water coming down our creeks and in our bays.

22 So I think that this methodology should have been  
23 focusing on the housing growth, not on both existing, as  
24 well as the housing growth.

25 So if we were voting on it today, I, too, would

1       also be voting no.

2               CHAIR MITCHOFF:   Thank you, Pat.

3               Anyone else wish to make a comment before we go  
4       to public comment?

5               COMMITTEE MEMBER TRAUSS:   Yeah, I will.

6               So there were only a couple letters ahead of  
7       time, which I was sort of surprised about.   But I want to  
8       address a couple of themes in those.   They seem to all be  
9       from Alameda; for commenters coming up, too.

10              So one of the themes was that Alameda -- the  
11       center of Alameda, that's the least sort of vulnerable to  
12       climate change impacts, is already very densely built out.  
13       And I looked it up.   And the absolute maximum density  
14       anywhere in Alameda is the equivalent to 20 units per  
15       acre, and much of it is much less.

16              So I just really want to remind everybody that  
17       this is a regional conversation.   And so you might have  
18       some local idea about what "low density" means in your  
19       town.   But remember who you're talking to, you know.   And  
20       so just 20 units per acre, it's not low density.

21              So if you have an idea that that's high density,  
22       and you come say it, you're kind of broadcasting that  
23       you're really not thinking at a regional level, and you  
24       don't really know what you're talking about.   So keep that  
25       in mind.   All these densities are relative.   And at the

1 regional level, high densities are definitely plausible.

2 The other thing, too, is something that came up  
3 in the previous two committee members' comments, which is  
4 this idea that towns don't have capacity to accommodate  
5 higher density development. And if that's the case, then  
6 the town's job is to get that capacity. Right?

7 In Alameda, they're saying, oh, we only have two  
8 ways off the island. They've been saying that for  
9 decades. You've had decades to get another way off the  
10 island. You should have done it 30 years ago. And now  
11 you have to do it because you will have to build more  
12 housing.

13 If you feel like there's not a lot of jobs in  
14 your town, look at your zoning. Are you zoning for jobs?  
15 See what you can do to make it possible for people to  
16 locate their businesses and their offices closer.

17 So that's the name of the game. We really have  
18 to all be on line with getting more housing. And if you  
19 feel like there's barriers, if you feel like you don't  
20 have enough transit, get more transit. You know, that's  
21 the pro-housing solution.

22 Thanks.

23 CHAIR MITCHOFF: Are there any other comments by  
24 members of the committee?

25 Marilyn, go ahead, please.

1 COMMITTEE MEMBER ASHCRAFT: Thank you, Chair  
2 Mitchoff. And there's a few others of us with our hands  
3 raised there.

4 But since my city was just mentioned -- hello,  
5 Ms. Trauss -- I just want people to understand that the  
6 City Council last week voted four-to-one to support  
7 methodology 8A that this committee has also supported.

8 That said, I certainly recognize and respect the  
9 First Amendment right of the residents in my city to speak  
10 their mind. We don't -- you know, like many groups, we  
11 don't all speak with one voice.

12 It is true that on the last -- on the November  
13 3rd ballot, we had a measure that I cochaired, along with  
14 the vice mayor, to repeal two charter amendments from 1973  
15 and 1991 that ban the construction of multifamily housing  
16 in the city of Alameda and limit density to no more than  
17 one housing unit per 2,000 square feet of land.  
18 Unfortunately, those did not succeed at the ballot box.  
19 So, you know, we're looking at our next steps moving  
20 forward in this very important issue.

21 But I just wanted you to know, from an official  
22 standpoint, what the City Council has said, when we voted  
23 last week on this particular housing methodology that,  
24 again, this committee has approved in the past.

25 So thank you.

1 CHAIR MITCHOFF: And I just want to echo, there's  
2 a number of communities throughout the Bay Area that have  
3 done as much as they can, but they have small footprints.  
4 And not everybody is able to do that.

5 Okay.

6 COMMITTEE MEMBER ASHCRAFT: That isn't what I  
7 said. Just, if you were referring to my remarks, that is  
8 not what I just said. But --

9 CHAIR MITCHOFF: No. I'm sorry. I was referring  
10 to what Sonja was saying.

11 I know you were talking about what's going on in  
12 Alameda.

13 Carlos Romero.

14 COMMITTEE MEMBER ROMERO: Yes, Madam Chair. I do  
15 have a few comments to make, but I will save them to the  
16 end because, certainly, I think it's important for us to  
17 -- we have all weighed in, in the past, on this issue. I  
18 think it's important to try to get to the public, to the  
19 extent possible. So I will hold off.

20 If there's time at the end, I will certainly  
21 chime in.

22 Thank you.

23 CHAIR MITCHOFF: Thank you, Mr. Romero.

24 Neysa? Neysa Fligor?

25 COMMITTEE MEMBER FLIGOR: Thank you, Chair. I'm

1       Neysa Fligor, Vice Mayor of Los Altos and Santa Clara  
2       County cities' association representative, on the housing  
3       methodology, and the Regional Planning Committee.

4               And, first, let me start by thanking ABAG  
5       leadership and staff, as others have done, in all their  
6       hard work, including the Housing Methodology Committee  
7       members.

8               As I've stated before, we support a RHNA  
9       methodology that advances the RHNA statutory objectives,  
10      allows for an equitable distribution throughout the  
11      region, preserves open space, performs well in reducing  
12      GHG emissions, allows for consistency between RHNA and  
13      Plan Bay Area 2050, and is a strong methodology to submit  
14      to the HCD for approval.

15              Of the three remaining methodology options that  
16      were presented to HMC, as we have all seen, and as staff  
17      has demonstrated repeatedly, Option 8A performed the best  
18      in meeting these legal requirements. It wasn't perfect,  
19      as many have already said, but it was the best compromise,  
20      and it definitely meets the statutory objectives.

21              Having said that, you know, as the representative  
22      for the cities in Santa Clara County, we would object to  
23      any option that further allocates a larger share to the  
24      Santa Clara County region.

25              Santa Clara County is one of only three

1 jurisdictions where its share of the RHNA allocation would  
2 exceed its share of the Bay Area households. And as  
3 Gillian just showed, the last cycle, Santa Clara County  
4 also had the largest share.

5           Similar to other counties in the region and  
6 statewide, our residents and elected officials are also  
7 questioning where and how they will be able to build these  
8 large share of allocated units, especially when we've  
9 already struggled the last eight years to meet much lower  
10 numbers.

11           So, you know, we can discuss the 441,000 big  
12 number that we received from HCD, and I understand the  
13 challenges that we will all face trying to meet our  
14 allocation. But at this point, with the remaining  
15 solutions before us, and Option 8A being the best one,  
16 when you view the statutory objectives, we believe the  
17 better solution is for us to join together as a region and  
18 figure out, is there a way to delay this RHNA process? Is  
19 there a way for us to join with ABAG and communicate to  
20 HCD on other solutions?

21           But if the goal of some of my colleagues is to  
22 change the methodology at this point, that is something  
23 that we could not support.

24           Thank you much -- so much, Chair, for giving me  
25 this opportunity.

1 CHAIR MITCHOFF: Thank you so much.

2 Mark Ross.

3 COMMITTEE MEMBER ROSS: Thank you, Madam Chair.

4 I will briefly speak in support of what my -- most of the  
5 speakers before me, Julie and Pat and Neysa have said.

6 8A would be the preferable option. Speaking as  
7 the Air District representative to the RPC, not meeting  
8 the VMT and the GHG goals is of greatest concern to this  
9 particular seat. And I don't see how we're going to do  
10 that with what is on the table, which was very hard work  
11 -- a lot of work by staff, which I do appreciate.

12 Option 8A does seem to be somewhat inching closer  
13 to that endeavor and that goal of producing GHGs and VMTs,  
14 but I'm -- that it doesn't look like we're going that way.

15 Being closer to jobs or finding some solution to  
16 that anachronism would be helpful.

17 Thank you.

18 CHAIR MITCHOFF: Thank you. I'm not seeing any  
19 other hands raised from committee members.

20 So at this time, I will go ahead and ask for our  
21 first speaker. Again, I'm going to have a timer. Three  
22 minutes.

23 Mr. Castro?

24 MR. CASTRO: Yes. Our first speaker is Clayton  
25 Holstine.



1           Please go ahead.

2           CLAYTON HOLSTINE: Thank you, Madam Chair, and  
3   committee members. I'm Clayton Holstine, City Manager in  
4   Brisbane, California, in northern San Mateo County.

5           Back on October 14th of this year, we sent a  
6   letter with regards to the proposed RHNA methodology to  
7   the ABAG Executive Board. Since then we've had an  
8   opportunity to meet with MTC and ABAG staff. Those have  
9   been productive meetings.

10          But we still maintain concern with regards to  
11   some of the areas in our town that are being identified  
12   for potential -- the future housing development. These  
13   are areas that were historical landfills from the early  
14   part of last century, as well as a tank farm area that  
15   serves San Francisco Airport. We don't believe these  
16   areas are suitable for housing.

17          We have gone through a multiyear planning process  
18   for the area that has been identified as a high-growth  
19   area. And in 2018, our voters approved a General Plan  
20   amendment that allowed up to 2,200 housing units on that  
21   site. We are actively involved with the land owner to  
22   move that forward, so that can reach fruition.

23          The proposed methodology, the output to that --  
24   from that, has us several hundred units above that. I  
25   would want to note that the 2,200 housing units is over

1 double our current housing stock. So we're more than  
2 being a good player in this process.

3 And we would ask for some future consideration  
4 with regards to the inputs to the model. We're not  
5 arguing the model itself, but the inputs, in terms of what  
6 available land is suitable.

7 Thank you very much.

8 CHAIR MITCHOFF: Thank you, Mr. Holstine.

9 Next speaker, Fred?

10 MR. CASTRO: Next speaker is David Foreman. Go  
11 ahead. David Foreman, please un-mute yourself.

12 PAUL FOREMAN: Okay. Thank you. It's actually  
13 Paul Foreman. David is my son. I have to be on his Zoom.  
14 Okay.

15 The purpose of this statement is to express my  
16 concern to ABAG of the fact that your methodology does not  
17 include natural hazards in the allocation formula. On  
18 page 5 of the October 15th report of the Executive  
19 Director, he comments on this factor with the parting  
20 sentence, "Local governments will have the opportunity to  
21 consider the most appropriate places for planning for  
22 housing in lower risk areas when they update their housing  
23 elements to the general plans."

24 That may be true for most cities in the Bay Area,  
25 but it's certainly not true of my city, Alameda. The ABAG

1 natural hazard map indicates that Alameda is among those  
2 cities with the lowest percentage of urbanized area  
3 outside of a hazard zone; less than 50 percent. It is  
4 obvious that the primary hazard that causes this is sea  
5 level rise.

6 A recent study by VCVC indicates that current  
7 projections from the year 2100 are 66 inches, with a storm  
8 surge level of 84 inches. A review of flood visualization  
9 maps shows that the portion of Alameda that is outside of  
10 a hazard zone is the center of an island which is already  
11 very densely built up. And one of your committee members  
12 talked about our 20 units-per-acre current zoning  
13 restriction, which, of course, doesn't apply to our  
14 housing element.

15 Well, we have a ten-square-mile island. We have  
16 75,000-plus people. We have 7,500 residents per square  
17 mile. That is a little bit more than Oakland. There are  
18 very few cities in the Bay Area that have higher density  
19 than Alameda. So that's what you have to look at, not our  
20 zoning ordinances.

21 With the fact that we have so little area outside  
22 of a hazard zone, and what we do have is built up, Alameda  
23 really has no choice but to build new housing directly in  
24 the flood hazard zone. In fact, the 4,000-plus new units  
25 that have been approved in the present cycle are primarily

1 in the flood hazard zone.

2 Add to that fact that Alameda is an island, with  
3 very limited ingress and egress, and the fact that most  
4 police and fire responders live off the island. And for  
5 someone to say that it's our obligation to fix our tubes  
6 and our bridges, as opposed to the state or as opposed to  
7 Oakland -- and I'm sure it hasn't been -- it's not in this  
8 condition for lack of trying.

9 None of the above is intended to argue that  
10 Alameda should not have a significant RHNA. We are a --

11 MR. CASTRO: Mr. --

12 PAUL FOREMAN: -- high resource city that fits  
13 very well into the equity factor --

14 CHAIR MITCHOFF: Mr. Foreman, thank you for your  
15 comments. You're welcome to submit -- (timer disruption).  
16 Okay. Stop.

17 You're welcome to submit the balance of your  
18 comments or all of your comments in writing.

19 Next caller, please, Fred.

20 MR. CASTRO: Joshua Hugg, go ahead.

21 JOSHUA HUGG: Good afternoon. My name is Josh  
22 Hugg, speaking on behalf of the Mid-Peninsula Regional  
23 Open Space District. Thank you for the opportunity to  
24 speak.

25 We are deeply concerned with the steep increase

1 in housing allocations for unincorporated counties in  
2 Option 8A, and request that allocations in these  
3 particular jurisdictions be significantly reduced.

4 Also, utilizing existing households as a basis  
5 for future growth in unincorporated areas ignores the  
6 intent to protect these predominantly open space areas and  
7 agricultural lands through intensification of  
8 significantly-urbanized areas.

9 High RHNA allocations in unincorporated areas  
10 will force counties to look beyond their limited urbanized  
11 areas and into greenfield locations to zone for new  
12 housing.

13 We feel the current allocation approach to  
14 unincorporated counties conflicts with Government Code  
15 65584(d)(2), which states that among the goals of the  
16 housing element is the protection of environmental and  
17 agricultural resources.

18 As a steward of several priority conservation  
19 areas for the last 50 years, we know that these lands  
20 provide critical ecosystem services to support urban areas  
21 through clean air, clean water, food, urban respite -- and  
22 urban respite for the public.

23 Our concerns are housing in the wild and urban  
24 interface and high fire-severity zones significantly  
25 increase the risk of fire ignition and poses risks for

1 homes in and around the WUI. Increased risk to sensitive  
2 habitats and enhanced risk of exposure of our predator  
3 populations to rodenticides adjacent to residential areas.

4 Impacts to regional critical habitat linkages  
5 which serve to enable wildlife movement across the  
6 landscape to enable -- to adapt to climate change and  
7 maintain local genetic diversity.

8 And, finally, new rural growth undermines VMT  
9 reduction goals outlined in SB 375, as these residents  
10 will likely be forced into cars.

11 We urge the committee to maintain the delicate  
12 balance between the built environment and natural and  
13 working lands that Plan Bay Area has successfully provided  
14 until now and reduce the pressure to building these  
15 ecologically-valuable areas.

16 Thank you.

17 CHAIR MITCHOFF: Thank you, Mr. Hugg.

18 Our next speaker, Fred.

19 MR. CASTRO: Greg Schmid.

20 CHAIR MITCHOFF: Mr. Schmid?

21 GREG SCHMID: Yes. Thank you for the  
22 opportunity.

23 The proposed RHNA numbers for the five cities of  
24 Silicon Valley are overwhelming in size and impacts. They  
25 are also in direct defiance with the California Government

1 Code.

2 First, the numbers. The number of new housing  
3 units required, within the five cities of Silicon Valley,  
4 would equal a 32 percent increase in the existing housing  
5 stock over the next eight years. It's a mandate for  
6 percentage increase that is 60 percent higher than the  
7 three largest cities in the Bay Area.

8 It's a 50 percent higher percentage increase than  
9 the large cities of San Mateo County along the bay. And  
10 it's a 150 percent higher percentage increase than the  
11 other large East Bay cities along the bay. Where do these  
12 numbers come from?

13 California Government Code Section 65584 mandates  
14 that the RHNA numbers be consistent with ABAG's Plan Bay  
15 Area 2050. But the same code requires ABAG to, quote,  
16 "Explore alternative ways of improving intraregional  
17 jobs-housing imbalances." They have not done that.

18 ABAG's Plan Bay Area 2050 methodology uses a  
19 single, very aggressive jobs-based model that focuses  
20 massive job growth in the five cities of Silicon Valley.  
21 That means, of course, that housing for the new workers is  
22 targeted within those same cities and has a very hard time  
23 competing with new office space for some of the most  
24 expensive real estate in the country.

25 ABAG has refused repeated public request that

1 they follow the Government Code that requires a serious  
2 look at realistic job dispersion to other Bay Area urban  
3 centers. Neither the housing committee, nor this  
4 committee, nor other city councils in the Bay Area has had  
5 a serious public discussion of the impact of jobs'  
6 dispersion across the Bay Area, as required by code.

7 Be clear. Request that the ABAG RHNA process  
8 stop, until ABAG follows the Government Code.

9 CHAIR MITCHOFF: Thank you, Mr. Schmid. That's  
10 three minutes. Thank you.

11 Next speaker, Fred.

12 MR. CASTRO: Yes, ma'am. Our next speaker is  
13 Aaron Eckhouse.

14 Go ahead.

15 AARON ECKHOUSE: Hi. Thank you. My name is  
16 Aaron Eckhouse. I'm the Regional Policy Manager for  
17 California YIMBY -- "Yes In My Backyard."

18 I want to say, I think -- I just want to commend,  
19 again, the HMC for the great work they did on this draft  
20 methodology. I think they did -- were faced with an  
21 exceptionally difficult task, in terms of balancing so  
22 many competing regional interests. And they did a really  
23 outstanding job. You see that in the fact that their  
24 proposal scores highly on all of the statutory objectives  
25 and the performance metrics that staff developed for that.



1           I want to particularly address the idea that this  
2 methodology does not advance in-fill growth, jobs-oriented  
3 growth, or transit-oriented growth because that is simply  
4 not accurate. There is significantly higher growth in  
5 transit-rich cities, in jobs-rich cities, and in low VMT  
6 cities, under this proposed methodology, compared to other  
7 cities in the region. So I think you will see, if you  
8 look at the performance metrics, that it scores highly on  
9 that front.

10           Some of the alternatives that have been proposed,  
11 particularly shifting the baseline, would be a disaster  
12 for some of those performance metrics, particularly those  
13 related to equity and fair housing and would, I think,  
14 leave ABAG vulnerable to either rejection by HCD or a  
15 lawsuit for failing to uphold their legal obligation to  
16 affirmatively further fair housing.

17           I think the agency proposal is fundamentally  
18 sound. And to the extent that there are issues, they can  
19 be addressed through small targeted adjustments, such as a  
20 reduction to the allocations specifically for  
21 unincorporated areas. I don't think we need to zero those  
22 out because there are places like Stanford that are in  
23 unincorporated areas and have housing needs. But there  
24 can be targeted adjustments made there.

25           There can be targeted adjustments made to further

1 improve equity. I know there's a proposed equity  
2 adjustment that would represent a relatively minor change  
3 at the scale of the methodology.

4 But, overall, I think you should uphold the work  
5 the Housing Methodology Committee did. I think it  
6 recognizes there is a need for housing everywhere in our  
7 region. There are jobs everywhere in our region. There  
8 are people in need of housing everywhere in our region.

9 And it directs more growth to jobs-rich and  
10 transit-rich areas, but it also recognizes the fact that  
11 every part of our region has a part to play in addressing  
12 our housing needs, and that shouldn't be limited by the  
13 fact that their current General Plan is inadequate.

14 Thank you.

15 CHAIR MITCHOFF: Thank you very much,  
16 Mr. Eckhouse.

17 Next speaker, please.

18 MR. CASTRO: Greenbelt Alliance. Go ahead.

19 AMANDA BROWN-STEVENSON: Hi. This is Amanda  
20 Brown-Stevens, from Greenbelt Alliance. I am the  
21 Executive Director from Greenbelt Alliance, and I was a  
22 member of the Housing Methodology Committee.

23 I just want to say, first, thanks to staff for  
24 all the work you've done. I think, overall, I am proud of  
25 being part of this process.

1           The methodology is, of course, a compromise; not  
2     perfect. But just would agree with Aaron's comments that  
3     it absolutely moves in the right direction, planning for  
4     homes and jobs -- planning for homes near jobs and  
5     amenities where people want to live.

6           I would also very much be in favor of making that  
7     relatively small adjustment to address unincorporated  
8     areas, particularly as per the comments by staff around  
9     the goals of Plan Bay Area and honoring urban growth  
10    boundaries and not inducing sprawl.

11          I think there are some ways to make those  
12    adjustments using a data-driven process to allocate the  
13    housing in -- in the manner of following infill and the  
14    sphere of the methodology.

15          Thank you.

16          MR. CASTRO: Thank you.

17          Our next speaker is Rodney Nickens.

18          RODNEY NICKENS: Thank you. Good afternoon,  
19    everyone. Rodney Nickens, with the Non-Profit Housing  
20    Association of Northern California. I was also a member  
21    of the Housing Methodology Committee.

22          I'd like to echo and affirm the comments from my  
23    colleagues at Greenbelt Alliance and California YIMBY.  
24    I'm in strong support of ABAG's proposed RHNA methodology,  
25    Option 8A, using the Plan Bay Area 2050 Households

1 Baseline.

2           However, I will also note that the methodology  
3 could be further refined and improved with an equity  
4 adjustment that myself, Jeff Levin, Carlos Romero, and  
5 Fernando Martí all advocated for as members of the HMC.

6           This equity adjustment is essential to ensuring  
7 that our RHNA methodology more fully meets statutory  
8 objectives to affirmatively further fair housing. As has  
9 been echoed by many of my colleagues and housing  
10 advocates, this adjustment is critical to moving us closer  
11 to a more inclusive and prosperous region where all  
12 residents have a safe and affordable home and access to  
13 economic and educational opportunity.

14           As has been mentioned, Option 8A was a  
15 compromise. However, Option 8A does fall short without  
16 the equity adjustment and will not ensure that  
17 inclusionary jurisdictions are doing their fair share to  
18 help our region reduce commutes, improve our environment,  
19 and ensure that every resident has a stable home that they  
20 can afford.

21           I would also just strongly urge ABAG to reject  
22 any alternative, such as changing the baseline, which  
23 would ultimately perform even worse on the statutory  
24 objectives' performance metrics. If any further  
25 adjustments are made, they should be to more fully and

1 more holistically improve the performance on these  
2 objectives.

3 And while we recognize that there are many  
4 essential planning objectives that must be advanced  
5 through the RHNA process, the housing element process is  
6 another opportunity to also explore those, which will also  
7 include equitable planning that accounts for geography  
8 that are vulnerable to fire and flood, protect our open  
9 space, while also tackling our region's long-standing  
10 problem with segregation and exclusion.

11 And so for those reasons I mentioned above, I  
12 strongly support Option 8A with the equity adjustment.

13 Thank you.

14 CHAIR MITCHOFF: Thank you.

15 Our next speaker, Fred.

16 MR. CASTRO: Paul Kermoyan.

17 PAUL KERMOYAN: Thank you, Madam Chair, and  
18 committee members. My name is Paul Kermoyan. I'm the  
19 Community Development Director for the City of Campbell.  
20 Thanks as well to the ABAG staff and HMC of advancing this  
21 methodology. It's really important.

22 The PBA 2050 growth projections illustrate  
23 geographical areas located within one-half miles of  
24 transit stops and high opportunity areas as being right  
25 for future housing growth. Unfortunately, these areas,

1     which are defined as PBA-eligible acres -- in Campbell's  
2     case, we have about 2,600 acres -- contain lands that  
3     simply cannot be developed. This is a common occurrence  
4     in all municipalities, and not unique to Campbell.

5             The acreage number is then folded into the  
6     HMC-recommended methodology which is used to assign the  
7     RHNA. Although the structure of the methodology may be  
8     found sound, the growth projection data input used to  
9     influence the outcome is not. For example, the acreage  
10    figure should exclude more than just roads, highways, and  
11    parks.

12            They should exclude new developments that will  
13    not turn over in the next 30 years; PG&E substations,  
14    creeks and riparian habitat conservation areas; historic  
15    preservation districts that are protected; valley water  
16    percolation ponds; single family zone districts, where a  
17    developer would have to buy out multimillion-dollar  
18    single-family homes in hope to build multifamily  
19    development; government-owned properties; abandoned VTA  
20    light rail extensions, et cetera.

21            Why is this important? Because state housing law  
22    requires that housing elements specify for each site the  
23    number of units that can realistically be accommodated and  
24    whether the site is adequate to accommodate housing. This  
25    is in Assembly Bill 1397.

1 Including lands that cannot be developed creates  
2 a scenario where cities will be unable to realize the  
3 desired outcome. And that's to create realistically and  
4 adequate sites to build housing.

5 Please help this region more realistically  
6 realize our goal and modify the PBA 2050 growth  
7 projections as an element of the HMC methodology.

8 Thank you.

9 CHAIR MITCHOFF: Thank you.

10 MR. CASTRO: Next speaker is Shajuti Hossain.  
11 Go ahead.

12 SHAJUTI HOSSAIN: Hi. I am Shajuti Hossain, an  
13 attorney with Public Advocates. And I want to echo  
14 comments by my colleague, Rodney Nickens, from NPH.

15 I also strongly support the Housing Methodology  
16 Committee's proposed methodology, but believe it needs to  
17 be further refined with an equity adjustment to more fully  
18 meet the statutory objective for affirmatively furthering  
19 fair housing.

20 This methodology, with the adjustment, will help  
21 our region reduce our commutes, improve our environment,  
22 and ensure every resident has a stable home they can  
23 afford.

24 The methodology uses job-proximity factors and  
25 Plan Bay Area Households Baseline, making sure that homes

1 are close to all kinds of jobs. This methodology, with  
2 the equity adjustment, allocates 60 percent of the total  
3 RHNA into San Francisco, San Mateo County, and Santa Clara  
4 County.

5 I'll add that even other counties do have jobs.  
6 Each day, over 180,000 people commute into Contra Costa  
7 County for work; meaning, there is still a need for more  
8 affordable homes there as well.

9 And the access-to-opportunity factor in the  
10 methodology is important, especially for the affordable  
11 allocations, because it prompts jurisdictions that have  
12 mostly zoned for single-family homes in the past to now  
13 zone for multifamily homes to meet those affordable  
14 allocations.

15 Multifamily apartment buildings are known to be  
16 much more efficient uses of our land, energy, and water,  
17 than single-family neighbors.

18 I also strongly urge the RPC and ABAG to reject  
19 alternatives that would perform worse on the statutory  
20 objectives performance metrics.

21 The equity adjustment is important because there  
22 are still 17 exclusionary jurisdictions that are not  
23 getting a fair share of affordable allocations. Without  
24 the equity adjustment, the RHNA will exacerbate fair  
25 housing problems in over one-third of our historically



1 exclusive jurisdictions.

2 I also recognize there are essential planning  
3 objectives that need to be advanced at the local level,  
4 through housing element updates. Those include planning  
5 that accounts for geographies particularly vulnerable to  
6 fire and flood, protecting our open space, and dismantling  
7 segregation within local jurisdictions.

8 So, again, I strongly support that -- the  
9 proposed methodology with the 2050 Households Baseline,  
10 along with the equity adjustment.

11 Thank you.

12 CHAIR MITCHOFF: Thank you.

13 MR. CASTRO: Next speaker is Elizabeth Osborne.  
14 Go ahead.

15 DERRICK SAGEHORN: Hi. This is actually Derrick  
16 Sagehorn, in Oakland. I just wanted to express my support  
17 for the HMC's work. And I think that Option 8A is really  
18 the best compromise, as well as associate myself with  
19 comments from California YIMBY and the Greenbelt Alliance.

20 I think, to the extent that we -- changes need to  
21 be made, they should be adjustments, rather than wholesale  
22 changes to inputs on the baseline, as been suggested by  
23 others here. I really think that this is a good  
24 compromise, but we just need more jobs near our housing.

25 I firmly reject the idea that job dispersion

1 needs to be part of this plan. It's just absolutely  
2 killer for VMT. We cannot control the jobs' sprawl that  
3 would result from that.

4 And then I also just want to say, from the  
5 perspective of smaller jurisdictions that are saying that  
6 they lack the resources to, one, meet the infrastructure;  
7 or, two, meet the subsidy needs for the low income portion  
8 of this. It's really difficult to hear this, when some of  
9 the same people are rejecting free money from the state  
10 for things like permanent supportive homeless housing  
11 through Operation Home Key.

12 So it's really difficult to hear that and have  
13 these same jurisdictions arguing for lower homes overall.

14 So thank you for your time. And, again, support  
15 for Option 8A.

16 Thank you.

17 CHAIR MITCHOFF: Thank you.

18 MR. CASTRO: Next speaker is Justine Marcus.

19 Go ahead.

20 JUSTINE MARCUS: Hi there. My name is Justine  
21 Marcus. And I'm the Policy Director with Enterprise  
22 Community Partners.

23 I'm speaking today in strong support of the ABAG  
24 Draft Methodology Proposal Option 8A, with the 2050  
25 Households Baseline, which was recommended by an

1       overwhelming majority at the HMC, here at the RPC, and at  
2       the ABAG Executive Board.

3               The proposed methodology will improve our  
4       regional balance of jobs and housing, which we know is  
5       essential to both reduce our greenhouse gas emissions, as  
6       well as improve the quality of life for thousands of  
7       workers who commute long hours to their jobs each day.

8               The methodology accounts for job growth,  
9       allocating about 60 percent of the total allocation to the  
10      three counties with the highest projected job growth.

11              And it also accounts for the existing imbalance  
12      between jobs and housing in counties that may not have the  
13      largest projected growth into the future, but where today,  
14      hundreds of thousands of people must commute in from other  
15      counties because they can't afford to live near their  
16      jobs.

17              I want to echo the comments made by our partners  
18      at Greenbelt Alliance and others that we support the  
19      targeted data-driven approach staff is pursuing to adjust  
20      the allocations to unincorporated areas. We had the  
21      sphere of influence while still planning for new homes in  
22      unincorporated areas where it is urbanized, and it is  
23      appropriate for new development.

24              In addition, I want to associate myself with the  
25      comments of our partners at NPH and Public Advocates to

1     emphasize that for the first time, this RHNA cycle, we are  
2     required to affirmatively further fair housing. And while  
3     Option 8A is a strong step forward, it needs to go further  
4     to adequately address the current patterns of racial and  
5     economic exclusion across the region.

6             This exclusion and segregation continues to  
7     undermine equal access to opportunity for all Bay Area  
8     residents, as well as our collected prosperity, our  
9     diversity, and our inclusivity as a region. Therefore, we  
10    urge ABAG to consider, including the small, but  
11    meaningful, equity adjustment, which would reallocate a  
12    small number of low-income homes, to ensure there are  
13    ample housing opportunities across the region at all  
14    income levels.

15            Finally, we urge ABAG to reject alternatives,  
16    specifically changing the baseline that many folks have  
17    mentioned perform overwhelmingly less well on the staff's  
18    performance metrics and put the region in jeopardy of not  
19    meeting statutory compliance when we submit to HCD.

20            Finally, we recognize there are many essential  
21    objectives of the RHNA process that will be advanced  
22    through local housing element updates, and we look forward  
23    to working with local partners to continue to engage in  
24    this work as it moves forward.

25            Thank you for your time.

1 CHAIR MITCHOFF: Thank you very much.

2 MR. CASTRO: Next speaker is Zarina.

3 Go ahead.

4 ZARINA: Hi. I am -- I echo what Aaron,  
5 Greenbelt Alliance, Shajuti, and Justine Marcus stated  
6 earlier.

7 I strongly support ABAG's proposed RHNA  
8 methodology with Option 8A, using Plan Bay Area 2050  
9 household baseline. But methodology needs to go further  
10 and basically deal with affirmatively furthering fair  
11 housing. This will move us closer to inclusive and  
12 prosperous region. We are -- all residents are -- you  
13 know, where they're working and they're living at the same  
14 place and with access -- access equity and access to  
15 environment, economic, and education opportunities.

16 Option 8A performs well in all five RHNA  
17 statutory objectives. There's some methodology with  
18 equity adjustment -- will help our region reduce our  
19 commutes, improve our environment, and ensure every  
20 resident has a stable home they can afford.

21 The job-proximity factor in Plan Bay Area  
22 Household Baseline ensures that our homes are closer to  
23 all kinds of jobs. Each day, thousands of people commute  
24 to Contra Costa for work, which means that we still need  
25 more homes from Clayton. And Clayton has a lot of open

1 spaces. You know, I'm not saying to go ahead and build  
2 everywhere that you can find. But they have to rezone for  
3 affordable housing. They have to do their fair share of  
4 housing.

5 Access to opportunities, allocate -- allocates  
6 more homes in places with high-quality jobs, schools, and  
7 environment.

8 I strongly urge ABAG to reject alternatives, such  
9 as changing the baseline, that performs worse on statutory  
10 objectives' performance metrics. If there's any  
11 adjustment, it has to be to make it more equitable;  
12 basically, affirmatively furthering fair housing.

13 And thank you for your time. And I am just tired  
14 of seeing the NIMBYs coming and putting up more layover,  
15 layover, layover. We are in housing crisis. We are where  
16 we are because of the NIMBYs. If it was not for them, we  
17 would not be forced into building 440,000 homes.

18 We have homeless. We have crisis. We have  
19 pandemic. When are you guys going to wake up, the NIMBYs?  
20 Okay? I'm tired of seeing the elected officials talking  
21 -- starting the conversation about, "We can't have it  
22 because there's a fire zone."

23 Well, of course there's going to be exception to  
24 the group of people who -- regions are in the fire zones  
25 and places where they cannot be built. That's just

1 logical; right?

2 But we need to move and make houses for people,  
3 and they have to be closer to homes they can have quality  
4 of life.

5 Thank you.

6 CHAIR MITCHOFF: Thank you. Next speaker.

7 MR. CASTRO: Victoria Fierce.

8 Go ahead.

9 VICTORIA FIERCE: Hi. Can you hear me?

10 CHAIR MITCHOFF: Yes.

11 VICTORIA FIERCE: Great. Thanks. Hi. My name  
12 is Victoria Fierce. I live in downtown Oakland. I'm a  
13 local resident. I'm also a former member of the HMC, the  
14 Housing Methodology Committee, and I'm the person who  
15 actually made the motion for 8A, the proposal that's  
16 before you right now.

17 You may also know me from previous films, such as  
18 CarLA versus Los Altos, where we beat them up in court for  
19 trying to avoid their RHNA obligations.

20 I'm really familiar with a lot of the arguments  
21 being made in opposition to the plan right now. And those  
22 people said pretty much the same thing at the HMC  
23 meetings, and we voted them down repeatedly, many times.  
24 It's quite (audible interruption) at this point, and we  
25 don't really have time to play such games.

1           I really agree with what Zarina just said, is  
2   that -- you know, tired of the NIMBYs. I agree. I'm  
3   tired of this saying that we want to do something about  
4   housing, and then there's an idea to do something, and  
5   this is that something, and then we just decide to not do  
6   it.

7           So 8A is the best solution. We spent months --  
8   nearly about a year, surviving during a pandemic to get  
9   this thing through the door. And it's before you. Please  
10   don't make all that work go to waste.

11          The thing about RHNA is that it just establishes  
12   minimums for cities. And if we want to end the housing  
13   crisis, we are setting an aspirational goal of ending the  
14   housing crisis through these RHNA numbers. And if people  
15   are upset about the numbers being too high, well, the  
16   answer is, you should have built more housing in the last  
17   20 years. But, unfortunately, that's not the case. So  
18   all we've got now is this plan in front of us.

19          This is the Bay Area. It's Silicon Valley. We  
20   are very smart people. We can put people on the moon. We  
21   built the Internet. We can solve this very simple problem  
22   of the human right to housing.

23          So please go ahead, and I support 8A. I think  
24   it's a great idea. Of course it is. You know, I'm asking  
25   you all to be bold and take a big step toward solving a



1 crisis. Don't do this, you know, backing off because of  
2 whatever reason -- that you're terrified of tall  
3 buildings. They're fine. I live in a three-story  
4 building. It's great.

5 Thank you.

6 CHAIR MITCHOFF: Thank you.

7 Next speaker.

8 MR. CASTRO: Kelsey Banes. Go ahead.

9 KELSEY BANES: Good afternoon. My name is Kelsey  
10 Banes. I am a Regional Executive Director with YIMBY  
11 Action, and I'm representing Peninsula for Everyone. We  
12 are a pro-housing group of peninsula neighbors for more  
13 neighbors.

14 And I want to start by thanking the HMC for all  
15 their work and in coming to a compromise that will help us  
16 grow in a more sustainable and equitable way in the  
17 future. So I do support the compromise, but will  
18 associate myself also with the commenters that are urging  
19 to do an equity adjustment, because I do think this plan  
20 could be improved, in terms of where the allocations are  
21 going and making sure we are affirmatively furthering fair  
22 housing. But I will also, you know, accept what we have  
23 as a compromise, if necessary.

24 So I'm also going to speak as a resident of Palo  
25 Alto. We have had a lot of our local electives and some

1 of my neighbors saying that we can't possibly build this  
2 many homes. And to me, when I hear that, it's a little  
3 bit like, "We've tried nothing, and we're all out of  
4 ideas," because I've been watching Palo Alto politics for  
5 several years now, and I haven't seen Palo Alto take much  
6 or many meaningful steps to improving our housing  
7 production or protecting tenants or preserving existing  
8 housing.

9 So I think we have a lot of work to do, but I  
10 believe we can do it. And it's just a matter of doing the  
11 work and locating the sites, and we can absolutely  
12 accomplish building more housing on the peninsula. This  
13 is not an impossible task.

14 CHAIR MITCHOFF: Thank you, Ms. Banes.

15 KELSEY BANES: Thank you.

16 MR. CASTRO: Next speaker is Hector Malvido.  
17 Go ahead.

18 HECTOR MALVIDO: Hi, folks. Can you hear me?

19 CHAIR MITCHOFF: Yes.

20 HECTOR MALVIDO: Great. Thank you. I just want  
21 to thank everyone, staff, RHNA folks, for working so hard  
22 on this. And also to my colleagues Ed Ho and others for  
23 really supporting Option A, the RHNA methodology, but also  
24 calling for the equity adjustment. It's so necessary to  
25 improve this methodology's performance and in furthering

1 fair housing objectives.

2 We need to ensure that we're considering the  
3 entire Bay Area in this process, including the 17  
4 jurisdictions that are under the current proposed  
5 methodology that without adjustment, would not receive  
6 their proportionate share of very low and low-income  
7 allocations.

8 The equity adjustment will help improve all Bay  
9 Area residents have access to high-opportunity areas and  
10 jurisdictions which would provide high-quality economic,  
11 education, and environmental opportunity.

12 Newly-allocated homes would be allocated to  
13 jurisdictions with quality jobs, adequate resources,  
14 schools, and minimum pollution. It would help reduce  
15 commutes and create opportunity for a bright and equitable  
16 futures for residents who work for all kinds of jobs and  
17 workers.

18 Currently many of our jurisdictions have severely  
19 unbalanced jobs-to-housing fit. It's crucial that, in the  
20 wake of the COVID-19 pandemic, as others have said, which  
21 has laid bare the many inequities present in our social  
22 safety net system, such as health, education, and housing,  
23 we've pursued smart, data-driven policy that just makes  
24 sense and is inclusive, community informed, and it is  
25 transformative.

1 Thank you for your time.

2 CHAIR MITCHOFF: Thank you.

3 MR. CASTRO: Next speaker is Ken Chan.

4 Go ahead.

5 CHAIR MITCHOFF: You're on mute. Take yourself  
6 off -- there you go.

7 KEN CHAN: I'm sorry. Can you hear me?

8 CHAIR MITCHOFF: Yes.

9 KEN CHAN: Okay. Great.

10 Hello members of the ABAG Regional Planning  
11 Committee. Thank you for your continued leadership and  
12 guidance as we continue to endure this pandemic together.

13 My name is Ken Chan, and I'm an organizer with  
14 the Housing Leadership Council of San Mateo County. We  
15 work with our community and leaders to produce and  
16 preserve quality affordable homes.

17 We, at HLC, would like to echo what was already  
18 previously mentioned by others today and voice our support  
19 for ABAG's Proposed RHNA Methodology, Option 8A, using the  
20 Plan Bay Area 2050 Households Baseline. However, as  
21 others have said, the methodology could be further refined  
22 with an equity adjustment to more fully meet the statutory  
23 objective for affirmatively furthering fair housing.

24 As we look ahead to our future, one thing is  
25 certain: We won't get very far if we do not plan for the

1 housing needs of the people in our communities. And it is  
2 the people that makes this region what it is.

3 In the long run, nobody thrives if we price out  
4 our children, who have the talent and skill to strengthen  
5 our businesses. No one thrives if small businesses are  
6 forced to close their doors because their rents are too  
7 high, and they can't attract or retain a work force. And  
8 no one thrives if families struggle to put a roof over  
9 their heads and parents can't provide care for their  
10 children.

11 This is an issue that matters to all of us, as a  
12 region, as a whole. You have an incredible opportunity to  
13 shape this region. And we urge you to support the  
14 methodology 8A, with an equity adjustment, and to, again,  
15 echo what was already stated.

16 We urge you to reject the alternatives, such as  
17 changing the baseline that perform worse on the statutory  
18 objectives' performance metrics.

19 Thank you.

20 CHAIR MITCHOFF: Thank you, Mr. Chan.

21 MR. CASTRO: Next speaker is Vicki Parker.

22 Vicki Parker, unmute yourself, please.

23 VICKI PARKER: I'm sorry.

24 CHAIR MITCHOFF: There you are. Go ahead. We  
25 can hear you.

1           VICKI PARKER: Thank you. I'm sorry for that.

2           Vicki Parker. I'm Community Development Director  
3 for the City of Novato. I just want to, as many other  
4 speakers have, acknowledge the complexity and the  
5 difficulty of the task and the enormous amount of effort  
6 that ABAG staff and the HMC have put into development of  
7 the methodology.

8           I also want to say that we generally support the  
9 goals in the methodology, and especially the focus on  
10 regional equity. We agree with comments, however, by  
11 several other speakers, that we think the -- a focus on  
12 natural hazards and other regulatory constraints, when  
13 looking at land inventories, needs to be better  
14 acknowledged. We have some suggestions for that, that we  
15 put into our letter.

16           Specifically, though, I want to focus on one  
17 thing, and that is -- our city's concern is that the use  
18 of 2050 future households as the baseline does not  
19 acknowledge the realities of missing or inadequate  
20 infrastructure. By that I mean water, sewer, streets,  
21 storm drains.

22           Using this future number, we feel, escalates the  
23 growth far more quickly than our capital budgets and  
24 programs can keep pace with. And we fully acknowledge  
25 that this may be hard for some folks to understand. If

1     you're not on the front lines of small city budgeting and  
2     priority setting, it doesn't necessarily make sense to  
3     folks.

4             But our draft numbers mean that we would be asked  
5     to provide two-and-a-half times our total 15-year  
6     build-out. And we would be asked to produce it in eight  
7     years. So half the time. So that may put it in some  
8     perspective that that's really unrealistic to think that  
9     jurisdictions can produce additional revenues to push  
10    capital projects forward at double the pace. We simply  
11    don't have the ability to produce new revenues.

12            We feel like use of 2050 households as the  
13    baseline sets us up to fail. And we respectfully request  
14    that the methodology instead utilize 2050 household growth  
15    as that baseline. As it's been said by many others, none  
16    of the methodologies are perfect.

17            We also agree that everyone has to do their part,  
18    and we're very happy to do our part. However, use of  
19    growth rates, instead of future households as the  
20    baseline, would allocate RHNA at rates that are consistent  
21    with Plan Bay Area.

22            MR. CASTRO: Thank you.

23            Our next speaker is Sidharth Kapur.

24            Go ahead.

25            SIDHARTH KAPUR: Hi. My name is Sid Kapur. I

1 live in Oakland, and I volunteer with YIMBY Action.

2 I just want to be here -- I'm here again, after  
3 several meetings of this, to again say I support the 8A  
4 proposed methodology. I would also support an adjustment  
5 of -- targeted adjustments of housing away from  
6 unincorporated areas and the equity adjustment that was  
7 proposed by other groups.

8 As everyone has said so far, this is -- the  
9 proposed methodology is really good. It has met all the  
10 metrics that we wanted it to meet. And there is really no  
11 reason to delay this decision anymore. Right?

12 Thank you.

13 CHAIR MITCHOFF: Thank you.

14 MR. CASTRO: Next speaker is Jordan Grimes.

15 Go ahead. Jordan Grimes, unmute yourself,  
16 please.

17 JORDAN GRIMES: Yes. Good afternoon. My name is  
18 Jordan Grimes. I'm a lead member of Peninsula for  
19 Everyone. We're a grass roots housing advocacy group with  
20 members from Daly City to Sunnyvale. I'm here to  
21 reiterate our strong support for Option 8A.

22 Our members participate in many of the housing  
23 methodology committee meetings, and we're very impressed  
24 by both MTC and ABAG's staff, as well as the wide, diverse  
25 range of input. Oftentimes, the only people who are able



1 to participate in meetings like these are affluent, white,  
2 and older. And, thankfully, this was not the case during  
3 this process.

4 Option 8A isn't perfect, but it is a very  
5 reasonable compromise that begins to reverse the Bay  
6 Area's unfortunate history of housing exclusion and  
7 suburban sprawl.

8 I do also want to echo the comments in support of  
9 the equity adjustment. Two other quick comments. No one  
10 is being set up to fail here. Literally, every city can  
11 meet their targets if they make the appropriate zoning,  
12 permitting, and process changes. It's on them to do so.

13 And then just one last thing I'd like to note,  
14 because I've heard it repeatedly, and I'm tired of hearing  
15 it. Having a certified housing element does not mean  
16 you're building your fair share of housing. It simply  
17 means the city has managed to jump through one specific  
18 bureaucratic hoop.

19 Menlo Park and San Mateo, the latter of which  
20 I've spent my entire life in, have both added between 1-  
21 and 2,000 units of housing over the last decade, while  
22 adding more than 20,000 jobs in the same time frame. Both  
23 have certified housing elements. And far too many other  
24 cities in the Bay Area have similar ratios. I cannot  
25 imagine anyone who would agree that they've done their

1 fair share.

2 Thank you.

3 CHAIR MITCHOFF: Thank you, Mr. Grimes.

4 MR. CASTRO: Next speaker is Salim.

5 Go ahead.

6 SALIM: Hi. I'm Salim. I'm a Bay Area native,  
7 and I'm also a member of California YIMBY.

8 I support the HMC methodology with targeted  
9 adjustments for unincorporated areas, and I'm also  
10 supportive of the targeted adjustments for equity  
11 concerns. So, you know, no one is perfectly happy with  
12 the proposal. It's a compromise; right? You have a  
13 region -- a whole region trying to find something that  
14 works for everybody. So I understand that, you know, some  
15 neighbors are not perfectly satisfied with what's on the  
16 table. But I think it's as good as it can be, given how  
17 much work has gone into it.

18 And, you know, I've heard some towns on this call  
19 say that the RHNA numbers for them are much too large or  
20 unfeasible. But you have to keep in mind, the scale of  
21 the solution has to match the scale of the problem. We  
22 know climate change is going to be one of the defining  
23 problems of our generation. We're the first generation  
24 that concede the crippling effects of climate change with  
25 these forest fires. And we're the last generation that

1 can do something about it.

2 So I think building more housing where there are  
3 jobs, building more housing in in-fill areas, instead of  
4 creating more sprawl, those are all important goals.

5 And the other crisis that, you know, we have to  
6 meet is the housing crisis. So I'm part of the younger  
7 generation than I think maybe the majority of the people  
8 on the call. And if I think about my friends, you know,  
9 the majority of them either have moved back in their  
10 family after college or they've moved to an area that's  
11 more affordable; i.e., they had to leave the Bay Area.  
12 It's not sustainable.

13 You know, the Bay Area has to be inhabitable for  
14 our own children. Otherwise, they're going to, you know,  
15 not be able to enjoy the same quality of life that we  
16 have.

17 So I hope that when towns are disappointed with  
18 the RHNA numbers that they have, they at least keep in  
19 mind that this help them. This will help them with their  
20 climate action plans. It will help them keep their own  
21 children in their community. And I think that the  
22 benefits of this definitely outweigh the cons.

23 Thank you.

24 MR. CASTRO: Our next speaker is Darrell Owens.

25 Go ahead.

1           DARRELL OWENS: Hi. Yes. I'm Darrell Owens.

2           I'm from Berkeley, California.

3           I just want to say that I support 8A for the  
4           umpteenth time. I hope this is the last time I have to  
5           call in and support 8A. I think the HMC is pretty clear.

6           I also support any methodology changes that shift  
7           more of the housing closer to the west bay and  
8           specifically shifted out of unincorporated areas. I think  
9           it's not only important from an equity and climate  
10          standpoint, but also from a feasibility standpoint.  
11          That's where housing demand is the highest.

12          And so if you actually want many of these housing  
13          allocations from the HCD to materialize, you want to put  
14          it into places where demand is the most pent up. That  
15          means that they won't sit there and be permitted and  
16          unfilled. And that's going to overwhelmingly be on the  
17          peninsula and San Francisco.

18          So I support item H8 -- or 8A.

19          CHAIR MITCHOFF: Thank you.

20          MR. CASTRO: Next speaker is Reyla Graber.

21          Go ahead.

22          REYLA GRABER: Okay. I would just like to add my  
23          support to prior speaker Paul Foreman and his comments  
24          regarding Alameda and some of its special characteristics,  
25          which should be taken into account, when figuring the RHNA

1 figures. But I want to finish Mr. Edward Singh's letter  
2 that I started reading previously. I'll just finish it.

3 Mr. Singh, from Alameda, says the RHNA  
4 requirements stress proximity to major city centers. This  
5 might have been a valid factor pre-COVID, but now that it  
6 has been demonstrated that teleworking has greatly  
7 decreased the need for proximity to the major city centers  
8 and will inevitably create a need for more jobs in  
9 professional, as well as service industries in more  
10 outlying cities.

11 Such change in employment and housing-needed  
12 characteristics should be reflected in the process of  
13 determining RHNA requirements for Bay Area cities. Even  
14 discounting potential changes in employment centers due to  
15 COVID, giving more weight to proximity to major business  
16 centers is somewhat tenuous. As pre-COVID, over 400,000  
17 commuters used mass transit to commute from outlying  
18 cities into the major business centers.

19 Mr. Singh finishes by saying, "I fully support  
20 the concept of social equity. However, I ask that you  
21 consider Paul Foreman's and my concerns and viewpoints  
22 regarding the proposed RHNA requirements for Alameda, city  
23 of."

24 Thank you.

25 CHAIR MITCHOFF: Thank you.

1 MR. CASTRO: Our next speaker is Sam Deutsch.

2 Go ahead.

3 SAM DEUTSCH: Hi. My name is Sam Deutsch, and  
4 I'm a San Francisco resident and also a member of YIMBY  
5 Action. And I'm calling to support the HMC methodology  
6 and furthermore support the equity and unincorporated area  
7 adjustments as well. I mean, we've had so many of these  
8 meetings already, and I've already voiced my support for,  
9 you know, putting more housing in places that are  
10 affluent, have good transit, have good climate, and are  
11 lower density than they should be.

12 But, also, I want to respond to a comment I heard  
13 earlier about, oh, you know, we don't have the  
14 infrastructure for this, blah, blah, blah. If you look at  
15 Prop 13, the fact that so much of our housing stock was  
16 built so long ago, is artificially depressing the amount  
17 of property tax that can be collected and that can be  
18 spent on infrastructure. So regardless of your opinion of  
19 Prop 13, it's the reality we face.

20 And as a result, the only way to adequately fund  
21 new infrastructure is to build a ton of more new housing  
22 that is assessed at market rate for taxing. So I find  
23 that to be an incredibly specious argument and one that  
24 does not hold up to any scrutiny.

25 And, yeah. Just reiterating my support for the

1 HMC methodology and building more housing in the Bay Area.

2 Thank you.

3 CHAIR MITCHOFF: Thank you.

4 MR. CASTRO: Next speaker is Kevin Ma.

5 Go ahead.

6 KEVIN MA: Hello. My name is Kevin Ma. I'm a  
7 resident of Palo Alto and Santa Clara County.

8 I support the HMC's proposal for 8A. It was  
9 created in a well-done consensus manner. And I do agree  
10 that there should be a few equity adjustments, and there  
11 should be changes regarding -- for some of the  
12 unincorporated methodology.

13 The question -- the issue with unincorporated is,  
14 it's such a wide bucket for a lot of different communities  
15 that I would like, perhaps in the future, to be broken  
16 down based on census-designated places. For instance, in  
17 Santa Clara County in particular, we have Coyote Valley  
18 and Coyote Creek, which is in the unincorporated areas,  
19 which people do want to protect. But we also have places  
20 around Stanford, which are much more likely to have  
21 infill. But currently, they're all bucketed as  
22 unincorporated.

23 So there are quite a few adjustments that need to  
24 be done. There's a few equity adjustments that should  
25 also be done, in the sense that we should be furthering

1 anything to do with affirmative -- affirmatively fair  
2 housing.

3 That being said, I also -- for all those speakers  
4 who talk about, "We can't build." We're still in a  
5 housing crisis. And telework isn't going to help the  
6 people who currently are searching for housing, searching  
7 for jobs, when their rent is still due.

8 Out of all of these projections, we're still  
9 projecting quite a bit of people rent-burdened. That is  
10 honestly immoral for our -- for the region we live in.  
11 Despite us being in the richest part of America, we should  
12 be building housing so that everyone can have a decent  
13 place to work and live, rather than everyone just  
14 defending their property values, in the sense that, "I  
15 just don't like neighbors."

16 Thank you.

17 CHAIR MITCHOFF: Thank you.

18 MR. CASTRO: Next speaker is Cherie L. Jensen.

19 Cherie L. Jensen, go ahead.

20 CHERIE L. JENSEN: Hi. The allocation of 2,100  
21 dwelling units to Saratoga is made by people who have not  
22 done the careful work of planning and sighting homes in  
23 our city. Fully half of Saratoga consists of steep hills,  
24 with extreme fire danger, ongoing soil creep, landslides,  
25 fault zones and traces. It has high rainfall, compared to



1 the valley floor.

2 The other half of our land is in what is called  
3 the "Forebay," meaning that we must leave open land to  
4 percolate rainfall and recharge our aquifer. Unlike San  
5 Francisco and the East Bay, which have commandeered  
6 substantial sierra water supplies, not us. 50 percent of  
7 our local water comes from our local sources. Hence, this  
8 forebay system is vital to our life.

9 As a planner by profession for San Jose and for  
10 the county of Santa Clara, we saw well from the early '70s  
11 what a critically important task this was. We learned the  
12 hard way the lessons of building homes on landslides and  
13 faults. Boulder Creek Homes built a large subdivision in  
14 the San Jose eastern hills. The land began to collapse.  
15 Houses collapsed. Utilities had to be built above ground,  
16 so when they failed, it was visible and could be fixed  
17 right away.

18 Homes were rebuilt over and over, as they  
19 continued collapsing, with all the families losing just  
20 about everything. The roads were continually rebuilt.  
21 Successive homeowners lost everything. The public paid  
22 and paid and paid for this mistake. Simoni Drive was the  
23 next to fall.

24 Eventually the geotechnical work for both sides  
25 of our valley showed that our hillsides are pretty much

1       unstable. In addition, they are extreme high-fire danger.

2               In the city of San Jose and in the county, we  
3       drew the urban limit lines at the 15 percent slope to keep  
4       the development out of these risky areas. Saratoga had  
5       come slightly later, about 1980, to the lower densities in  
6       these highly unstable lands. And through citizen  
7       initiatives, we lowered the density. We had to. It was  
8       costing us a fortune to rebuild the roads and deal with  
9       the legal liabilities.

10              The flatter lands of Saratoga were designated by  
11       the Santa Clara Valley Water Agency as forebay, based on  
12       their value in percolating the rainfall into our aquifer.  
13       Some other cities in the county also have some forebay  
14       lands. All these forebay lands play a vital role in  
15       restoring our aquifers for the whole county, so they can  
16       hold our water. 50 percent of our county's water comes  
17       from this system.

18              To accommodate this process, Saratoga has had a  
19       hardscape limit on development that is 30 percent per  
20       parcel. This proposal -- (multiple speakers speaking at  
21       once).

22              CHAIR MITCHOFF: Ms. Jensen, that's three  
23       minutes. Thank you.

24              MR. CASTRO: The next speaker is Rob Nielsen.

25              Go ahead.

1 (Brief interruption.)

2 ROB NIELSEN: Hello?

3 Hello? I've got some cross-talk here, but my  
4 name is Rob Nielsen. I live in Palo Alto and want to  
5 support the 8A from the methodology committee. I attended  
6 several of the meetings this summer/fall, and I'm very  
7 impressed by all the hard work that was done, and the back  
8 and forth to reach a compromise that met all your  
9 statutory requirements.

10 I want to particularly point out the high  
11 opportunity requirement. Since I moved here 37 years ago,  
12 there's been less and less opportunity for many people  
13 just because of the high cost of the housing. And I'm  
14 glad you want to start tackling that issue so that you  
15 provide more opportunities for all people to live here and  
16 to add to the benefits of the Bay Area. And I'm glad  
17 you're taking some steps to correct it.

18 So thank you very much.

19 CHAIR MITCHOFF: Thank you.

20 MR. CASTRO: Our last speaker is Adam Buchbinder.

21 Go ahead.

22 ADAM BUCHBINDER: Hello. Hi. I'm Adam  
23 Buchbinder. I'm a planning commissioner in the City of  
24 Campbell. I'm speaking only for myself here.

25 As a commissioner, I'm quite familiar with

1 Campbell. The idea that we shouldn't have an ambitious  
2 housing target because we're mostly single-family zoned is  
3 downright nonsensical. The housing need doesn't care  
4 about our zoning map. If the zoning map doesn't support  
5 the need, the map has to change. This is what the housing  
6 element process is for. This is what the General Plan  
7 update -- which we are in the middle of in Campbell -- is  
8 for. It is morally horrible to place the esthetic whims  
9 of the past over the desperate needs of the present.

10 The HMC proposal is the result of the kind of  
11 collaborative decisionmaking and compromise that we're all  
12 in favor of. It's perfectly reasonable to make targeted  
13 adjustments to, for example, reduce allocations in  
14 unincorporated areas. But doing anything major, like  
15 changing the baseline growth metrics, undermines their  
16 work and will most certainly lead to worse outcomes.

17 This is an inherently contentious process, but  
18 it's vital that we find a way forward. HMC has provided  
19 that. I encourage ABAG to use it.

20 Thank you for your time.

21 CHAIR MITCHOFF: Thank you.

22 MR. CASTRO: Chair Mitchoff, this is Fred. Two  
23 additional members of the public have raised their hands.

24 CHAIR MITCHOFF: Go ahead, please.

25 MR. CASTRO: Yes. Next speaker is Joanna.

1           Go ahead. Joanna, please unmute yourself.

2           JOANNA GUBMAN: Sorry.

3           Hi guys. My name is Joanna Gubman, and I'm a  
4    colead with Urban Environmentalists. And I'm just calling  
5    in out of my workday to say that we support the HMC  
6    proposal.

7           It's also illegal to base our plans on regulatory  
8    constraints like existing land use restrictions because it  
9    reenforces exclusionary patterns.

10          Thanks very much for listening.

11          CHAIR MITCHOFF: Thank you very much.

12          MR. CASTRO: And our last speaker is Zac Bowling.  
13          Go ahead.

14          ZAC BOWLING: Hi there. I'm a resident of  
15    Alameda, and I wanted to voice my disagreement with the  
16    statements by Paul Foreman.

17          Alameda is not unique, when it comes to natural  
18    hazards, compared to the rest of the Bay.

19          And I also wanted to voice my support of the HMC  
20    proposal.

21          Thank you.

22          CHAIR MITCHOFF: Thank you.

23          Fred, I'm understanding there are no more public  
24    speakers?

25          MR. CASTRO: There are no other speakers with

1       their hands raised.

2               I do have a list of public comments that were  
3       received, written comments, and I'd like to read those  
4       names, please.

5               CHAIR MITCHOFF:   Yes.   Please do.

6               MR. CASTRO:   David Howard, Paul Foreman, Public  
7       Advocates, Singh Bardin, Valley A. Ebert, Corte Madera,  
8       Edward Singh, Public Advocates, and Danielle Stang.

9               Thank you.

10              CHAIR MITCHOFF:   All right.   With that, I will  
11       close the public hearing.

12              And Mr. Mahoney, that just means --

13              COMMITTEE MEMBER ROMERO:   Madam Chair?

14              CHAIR MITCHOFF:   Go ahead.

15              COMMITTEE MEMBER ROMERO:   Madam Chair, may I just  
16       make a comment?   I know I wanted to reserve two minutes of  
17       my time here at the end.

18              CHAIR MITCHOFF:   Sure.

19              COMMITTEE MEMBER ROMERO:   So I, too, want to just  
20       support 8A and an equity adjustment to 8A to affirmatively  
21       further fair housing in the nine-county Bay Area.   I think  
22       it is essential to do that.

23              Let us remember that 8A is a compromise from 6A,  
24       as many of the speakers have said.   It took us a while to  
25       get here.   We agreed on that.   And any wholesale change to

1     this process, and/or another option at this point, really,  
2     would serve neither the public, nor, for that matter, any  
3     of us and any of the residents of the nine-county Bay Area  
4     because it would not have been a vetted discussion.

5             And more importantly, there is no way that any  
6     other option introduced today would be able to have the  
7     widespread discussion, and ultimately approval of, as you  
8     heard today, many of those folks speaking. So, again, I  
9     urge that we do move forward with 8A, with an equity  
10    adjustment.

11            And certainly, lastly, I'll say, I was really  
12    pleased to hear Greenbelt Alliance speak in favor of 8A.  
13    And, certainly, I know that our staff is working quite  
14    diligently with the three counties that have concerns  
15    about the allocation of units to the unincorporated areas.  
16    And I think that that issue is surmountable by utilizing  
17    our staff's smarts, as well as applying and approving 8A.

18            Thank you.

19            CHAIR MITCHOFF: Thank you, Carlos.

20            All right. Now I will close the public hearing.

21            Just as a reminder for anyone listening in, who  
22    wants to comment, you have until November 27th. And the  
23    information on how to do so is on the website.

24            All right. We're going to move on to --

25            COMMITTEE MEMBER BONILLA: Madam Chair, Rick

1 Bonilla. If I may, now that I have heard extensive public  
2 comment, I'd like to make a final statement.

3 CHAIR MITCHOFF: Fine. And I see Melissa --

4 COMMITTEE MEMBER JONES: Likewise --

5 CHAIR MITCHOFF: But you've commented already.

6 Well, go ahead, Rick. Please keep it short.

7 We've got another hearing.

8 COMMITTEE MEMBER BONILLA: Thank you. Of course.

9 I just want to say, having heard extensive public  
10 comments, I just want to add that after undergoing and  
11 being a member of and taking a part in the decisionmaking  
12 with the Housing Methodology Committee, which was a long  
13 and really informing process, I believe that we came forth  
14 with the best recommendation possible, that will go and do  
15 the best at meeting the housing -- the affirmatively  
16 further fair housing mandate, and will meet the goals  
17 necessary to provide the housing that we need in the  
18 locations where we need it.

19 I understand other jurisdictions have some  
20 issues. Those can be worked through. I believe that  
21 we're going to be able to go forward, though, with this.

22 And I recommend for everybody to -- if you don't  
23 understand it, please take a closer look. This is a great  
24 option.

25 Thank you very much.



1 CHAIR MITCHOFF: Thank you.

2 And Melissa.

3 COMISSIONER JONES: Yes. And also having heard  
4 public comment, I want to lend my support as well to the  
5 equity enhancement proposed to 8A. You know, we are  
6 living through perhaps the most fundamental demonstration  
7 of the inequities in our system. The pandemic has had a  
8 huge percentage of the population working from home and  
9 many more in the very jobs that would qualify folks for  
10 affordable housing out at work and exposed.

11 This is a moment where the least we can do, I  
12 think, is make sure that we have a strategy that gets us  
13 to full affordable housing for those people who have  
14 worked so hard.

15 And the existence of exclusionary communities  
16 that have benefitted from the hard work of those families,  
17 it really is time to figure out how those exclusionary  
18 communities start to create the housing in their  
19 communities for the families whose labor they benefit  
20 from.

21 CHAIR MITCHOFF: Thank you.

22 David Rabbit.

23 COMMITTEE MEMBER RABBIT: Thank you very much,  
24 Madam Chair. I just want to make sure, once again, I get  
25 this on the record. And I want to thank staff and the

1 members of the Housing Methodology Committee.

2 I am supportive of the preferred methodology  
3 moving forward. Of course, I do remain concerned about  
4 the errors in urban (inaudible). I know that our staff is  
5 working on that. We -- you know, for instance, in our  
6 county, it identifies high-density housing assumptions in  
7 graveyards and floodways and rural recreation lands many  
8 miles from services. There's 20 instances of that in our  
9 county alone; adjacent to freeways, with high pollution  
10 emission rates; industrial lands adjacent to noxious land  
11 uses; or within high wildfire areas. And I can't tell you  
12 how important that is to this county that has now had five  
13 major wildfires in the last three years and has burned  
14 some 300,000 acres of land and nearly 9,000 total  
15 structures.

16 Our population has actually decreased since the  
17 first major wildfire. And that is significant, and we  
18 look forward -- we are open to building. We are providing  
19 incentives. We just put \$10 million into a housing fund  
20 to keep moving forward on city center growth.

21 There's nearly a thousand percent increase in the  
22 cycle's allocation for the unincorporated county of  
23 Sonoma. That growth can only occur where services are;  
24 Basically, water and sewer. That's very few places.

25 And we just want to make sure that we correct --

1 we are more than willing to take our share. We are more  
2 than willing to push ourselves, like we always have. We  
3 want to make sure that we're doing it with correct,  
4 error-free data, or as little errors as possible going  
5 forward.

6 And we want to make sure that we cannot  
7 contradict our other goals of greenhouse gas emissions'  
8 reductions. Because sometimes, that's what happening in  
9 higher numbers in the unincorporated area.

10 And I will add one last thing, that's a  
11 relatively new development. And I think every county, at  
12 some point, is going to find this out. The safe road  
13 standards that you need to get approved by the California  
14 Department of Forestry have all been stopped. And that  
15 means that you cannot build a building on a nonstandard  
16 street, of which the unincorporated counties around the  
17 Bay Area probably have thousands and thousands of miles,  
18 unless you improve that street segment all the way down to  
19 the next safe street getting towards a fire station.

20 This is prohibitively expensive, and it will be a  
21 state issue for probably some years to come. I don't know  
22 what the right answer is. But I know that it's going to  
23 prohibit a lot of growth in unincorporated areas.

24 So, again, I just want to make sure that the  
25 errors are going to be corrected before we move forward,

1 and if staff can just talk again about how that is going  
2 to get factored in. That, and I know that the sphere of  
3 influence of which we think we -- will work in this  
4 county, with the City of Santa Rosa and some of those  
5 areas that are going to shortly be annexed, to make sure  
6 that we have that mix just right, we're pushing for more  
7 housing. We want more housing. We just want to make sure  
8 that we're not at odds with ourselves or the RHNA numbers.

9 Thank you.

10 CHAIR MITCHOFF: Thank you, David.

11 I'm not seeing any other raised hands. Let me  
12 check one more time. Nope. Okay.

13 I am now going to close the public hearing. And  
14 we are moving on to item 6B.

15

16 (PUBLIC COMMENT ON AGENDA ITEM 6B)

17

18 CHAIR MITCHOFF: For the sake of time, I really  
19 don't -- does anybody want a staff presentation, or would  
20 you like to go directly to comments of the commissioners  
21 and the public?

22 COMMITTEE MEMBER EKLUND: Madam Chair, I don't --  
23 we had a presentation at the last meeting. So is it  
24 possible for us to go to public comment and then  
25 discussion?

1 CHAIR MITCHOFF: That's what I was hoping for, is  
2 that we've all -- Susan, you're okay with that?

3 COMMITTEE MEMBER ADAMS: I'll second that. Yes.

4 CHAIR MITCHOFF: All right. Wonderful. We are  
5 all on the same page.

6 All-righty. And I want to thank staff. That  
7 doesn't take away from all the hard work you've done.

8 Matt, do I need to repeat everything I said  
9 before, relative to the court reporter and the county or  
10 the code section and everything? I -- this one -- the  
11 Government Code section actually is one digit off. It's  
12 65584.03(C).

13 And, again, on this one, we can accept and will  
14 be accepting any mailed-in comments until November 27th.

15 So with that, are there any commissioner  
16 committee member comments before we go to the public  
17 hearing?

18 MR. CASTRO: Chair Mitchoff, this is Fred. Could  
19 I just confirm that the court reporter is still with us?

20 CHAIR MITCHOFF: Yes.

21 THE REPORTER: I am here.

22 CHAIR MITCHOFF: How are you doing?

23 (Discussion held off the record.)

24 CHAIR MITCHOFF: All right. Let us go directly  
25 to public comment. Again, you will have three minutes to

1 make your comments.

2 Fred, do we have members of the public who wish  
3 to speak?

4 MR. CASTRO: At this point, there are no raised  
5 hands from the attendees --

6 COMMITTEE MEMBER BONILLA: Madam Chair -- I mean,  
7 Fred.

8 I do have a question about the material that is  
9 presented, before we go to comments. I think it's  
10 important.

11 CHAIR MITCHOFF: All right. Go ahead, Rick.

12 COMMITTEE MEMBER BONILLA: On the subregions, if  
13 we look at the slide -- what is it? The slide that shows  
14 the subregions and the amounts, their total allocations.

15 If we look at Napa County, and in paragraph  
16 three, on the page above, it says that there will be no  
17 harm, nor benefit to member jurisdictions. And yet, if we  
18 look at the allocation totals, Napa County shows 3,436 on  
19 slide four of this presentation. Yet, if you look at the  
20 subregion, I mean, as the regional -- the regular share,  
21 it shows 3,816. Okay? And I think this might be an  
22 error. Because when I look at the same information for  
23 Solano County, those two numbers are the same.

24 CHAIR MITCHOFF: Staff, can you address that  
25 concern?

1 MS. ADAMS: So I'm not sure where you're looking  
2 at the larger number, the 3,800.

3 COMMITTEE MEMBER BONILLA: Slide three of the  
4 presentation for this item.

5 MS. ADAMS: Okay.

6 COMMITTEE MEMBER BONILLA: Okay. If you look at  
7 the bottom bullet point. It says that this confers no  
8 harm, nor benefit.

9 Go to the next slide. Okay. If you look at the  
10 total allocation for Napa and Solano. Solano County, the  
11 total allocation, there is no change between this and the  
12 regular allocation shown on the presentation. The numbers  
13 are both 11,906.

14 On Napa County, here it shows 3,436. But on the  
15 regular allocation, it shows 3,816.

16 MS. ADAMS: So the reason -- I'm sorry. I wasn't  
17 sure what other number you were referring to, but it's  
18 from the previous presentation.

19 So the reason for that is because not all of the  
20 jurisdictions in Napa County are part of the subregions.

21 COMMITTEE MEMBER BONILLA: Okay. You left it  
22 out. All right.

23 MS. ADAMS: Yeah. So if you look at slide number  
24 two of the subregions' presentation, you'll see that  
25 Calistoga and St. Helena are participating in the regional

1 process, not the subregion process.

2 COMMITTEE MEMBER BONILLA: Thank you. Just  
3 checking. Thank you very much.

4 CHAIR MITCHOFF: All right. Great question.  
5 Thank you for the clarification.

6 All right. We're going to go to public comment.

7 Take care. Julie said she had to drop off, I  
8 saw, and I'm, like, "Take care, Julie."

9 But, anyway, let's go ahead with public comment.

10 Fred, you said there hasn't -- weren't anybody --  
11 there weren't any individuals who wished to provide public  
12 testimony on this item. Just confirming that.

13 MR. CASTRO: That is correct. No hands raised.

14 CHAIR MITCHOFF: Then would you go ahead and read  
15 if there have been written comments made?

16 MR. CASTRO: The comments -- the names of the  
17 people who submitted public comments were mostly for 6A.  
18 And I think there was one for 6B, but I can't find that  
19 reference. But those were the only submitted public  
20 comments that we received for item 6.

21 CHAIR MITCHOFF: All right. Then, Monica, you're  
22 just happy. Okay. And I -- okay. So with that --

23 COMMITTEE MEMBER BROWN: It's not (inaudible)  
24 right. And it's coming across, at least in Solano County,  
25 as noise.



1 CHAIR MITCHOFF: What is that? You're hearing  
2 some background noise? Okay. Well, we're almost  
3 finished. So that's the good news.

4 So, again, to reiterate, there were no  
5 individuals of the public who wish to testify, and  
6 Mr. Castro read into the record those who have given  
7 written comment.

8 Again, reiterating, anyone can provide written  
9 comments through November 27th, 2020.

10 And with that, I will close that public hearing  
11 on 6B.

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## 1 CERTIFICATE OF REPORTER

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I, AMBER ABREU-PEIXOTO, hereby certify that the said proceedings were taken in shorthand by me, a Certified Shorthand Reporter of the State of California, and was thereafter transcribed into typewriting, and that the foregoing transcript constitutes a full, true, and correct report of said proceedings to the best of my ability which took place via an electronic platform;

That I am a disinterested person to the said action.

IN WITNESS WHEREOF, I have hereunto set my hand this 7th day of December, 2020.



AMBER ABREU-PEIXOTO, CSR No. 13546



City of Alameda • California

November 12, 2020

Jesse Arrequin, President  
Executive Board, Association of Bay Area Governments  
375 Beal Street, Suite 700  
San Francisco, CA 94105

*Subject:* Proposed RHNA Methodology and Sub regional Shares

Dear President Arrequin,

On behalf of the City of Alameda Mayor and City Council, I am pleased to be sending you and the Housing Methodology Committee this letter of support for your work over the last year. We recognize that developing a methodology for the distribution of over 441,000 housing units across the Bay Area's many cities and counties is a thankless job, but we want to thank you.

On November 4, 2020, the Alameda City Council discussed the proposal made by the Tri-Valley Cities and their request that ABAG de-emphasize the equity factor that is an important policy objective in the regional plan and successfully implemented in the Methodology Committee's "Option 8A".

Although the Tri-Cities proposal would reduce Alameda's RHNA allocation by approximately 30%, the Alameda City Council on a vote of 4-1 directed staff to transmit this letter of opposition to the Tri-Valley request to de-emphasize the need for greater equity across the Bay Area.

As an island city, we understand that each municipality may have factors that they believe should change their individual numbers, but the Alameda City Council believes strongly that addressing historic inequities in planning, land-use and transportation is a bare minimum for prioritization when it comes to housing allocations and that additional considerations should not have a reduced impact on these factors.

The City of Alameda City Council commends the Committee on their good work to date and your efforts to address long standing in-equities throughout the Bay Area.

Sincerely,

Andrew Thomas,  
Director of Planning, Building and Transportation, City of Alameda.

cc. Alameda Mayor Marilyn Ezzy Ashcraft and City Council  
Alameda City Manager, Eric Levitt



# TOWN OF ATHERTON

CITY COUNCIL  
150 WATKINS AVENUE  
ATHERTON, CALIFORNIA 94027  
(650) 752-0500  
FAX (650) 688-6528

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November 20, 2020

Ms. Karen Mitchoff, Chair  
ABAG Regional Planning Committee  
c/o ABAG-MTC Public Information Office  
375 Beale St, Suite 800  
San Francisco, CA 94105

VIA EMAIL

**RE: Proposed RHNA Methodology and Subregional Shares**

Dear Chair Mitchoff:

I write on behalf of the Town of Atherton to provide comment on the proposed methodology for the RHNA 6 cycle and the draft subregion shares passed by the Executive Board at their meeting on October 15, 2020.

The Town of Atherton is a small, residential community with public and private schools. Aside from local school operations, the Town's primary land use is residential, and the Town does not allow commercial development. As a result, there are very few jobs outside of the limited number of Town employees and employees of local schools. It is also important to note that Caltrain no longer serves this community and transportation options are very limited.

The RHNA methodology relies heavily on proximity to jobs as a factor. Neighboring jurisdictions regularly approve large scale commercial developments that result in job growth, demands on local resources, and a demand for new housing in those communities. Those communities in turn, also benefit from the resulting tax bases and should be required to provide their fair share of housing and resource amenities to meet a healthy job-to-housing ratio. As the Town does not anticipate growth, let alone job growth within the Town limits, this methodology is not applicable to the Town of Atherton.

As noted above, the Town's long-standing character is as a residential community. With the last Housing Element process, the Town revised its Accessory Dwelling Unit (ADU) ordinance to exempt ADUs from floor area. This resulted in substantial new construction of ADUs in a manner that remains consistent with the Town's character. In 2020 Town updated its ADU ordinance for compliance with State regulations and will continue to promote new ADU construction as a means of balancing new housing options. In addition, the

Town has committed to working with the local schools to promote new housing on their facilities. The Town is supportive of a reasonable RHNA allocation that can be achieved within its community character.

Satisfying the RHNA requirement as proposed would be nearly impossible to achieve without *fundamental* changes to the Town's land use framework. The Town's General Plan and Zoning Ordinance – the key elements of our Town's constitution—will need to be rewritten in order to accommodate this level of new growth. The Town requests that the final methodology take into consideration sustainability and impacts on community character.

For the reasons outlined above, the Town respectfully asks that you reconsider the allocation methodology. Thank you for your consideration, and this opportunity to provide comment.

Sincerely,

A handwritten signature in blue ink, appearing to read "Rick DeGolia".

Rick DeGolia  
Mayor  
Town of Atherton



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## CITY of BELVEDERE

450 San Rafael Avenue ♦ Belvedere CA 94920-2336

Tel.: 415.435.3838 ♦ Fax: 415.435.0430

[www.cityofbelvedere.org](http://www.cityofbelvedere.org)

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November 24, 2020

To whom it may concern,

Please accept the enclosed letter from Belvedere Mayor Nancy Kemnitzer as a public comment on the methodology for determining RHNA housing numbers for jurisdictions over the next cycle.

We were not able to participate in the hearing on this topic, and would appreciate your placing the Mayor's letter into the record.

Thank you very much.

Craig Middleton  
City Manager





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## CITY of BELVEDERE

450 San Rafael Avenue • Belvedere CA 94920-2336

Tel.: 415.435.3838 • Fax: 415.435.0430

[www.cityofbelvedere.org](http://www.cityofbelvedere.org)

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October 13, 2020

Mayor Jesse Arreguín, President  
Association of Bay Area Governments, Executive Board  
375 Beale Street, Suite 700  
San Francisco, CA 94105-2066

Dear Board President Arreguín,

On behalf of the City of Belvedere, please accept this letter of comment on the proposed Regional Housing Needs Allocation (RHNA) methodology recommended by the Housing Methodology Committee (HMC). We request that these comments be read and considered in advance of the October 15, 2020 ABAG Executive Board meeting where the recommended methodology will be discussed, because we believe a flaw in the methodology may defeat the chances of progress you seek to achieve.

The City of Belvedere appreciates the dedication of the officials, staff members and volunteers in seeking to develop a methodology and to achieve consensus on an appropriate distribution of 441,000 new housing units. It is a daunting undertaking, given the complexities among competing goals: housing supply and affordability; climate change; and transportation infrastructure and funding.

Belvedere has a population of fewer than 2,000 residents, and is located within a constrained land area of only .54 square miles surrounded on three sides by water, that is almost totally built out. While we have taken concrete actions to meet our housing needs allocation, no amount of effort, incentives or policy changes would be enough to add the number of units allocated to Belvedere under the methodology proposed by the HMC. Creating 160 units in this confined space of privately held land is simply unattainable.

Belvedere completed its housing element update process for the fifth cycle of State-mandated housing element updates (2015-2023). In May of 2015, the City Council approved the adoption of the Housing Element and the associated environmental document. At that time, and as part of the Housing Element update, the City also adopted amendments to the City of Belvedere



Zoning Ordinance (Title 19 of the Municipal Code) in order to implement specific programs in our 2030 General Plan Housing Element and to comply with the California Department of Housing and Community Development State laws. These include:

- amendments to “Transitional and Supportive Housing,” as a permitted use in all residential Zoning Districts;
- amendments to comply with the State density bonus law (Government Code Section 65915 et seq.); and
- provision for reasonable accommodation for persons with disabilities seeking equal access to housing under the Federal Fair Housing Act and the California Fair Employment and Housing Act (the “Acts”) in the application of zoning laws and other land use regulations, policies and procedures.

The City received a letter from HCD, dated May 18, 2015, stating that the adopted Housing Element was in full compliance with State Housing laws.

Additionally, in 2017, 2018 and 2019, code amendments were adopted regarding Accessory Dwelling Units and Junior Accessory Dwelling Units to further comply with State law (Government Code sections 65852.2 and 95852.22). Our planning officials regularly meet with project applicants to encourage private implementation of these laws and policies.

Thus, Belvedere has been active in taking steps to meet regional housing needs.

We recommend that the Executive Board take ABAG staff’s July 2020 suggestion to incorporate the Draft Blueprint in the RHNA methodology by using each jurisdiction’s share of Household Growth from 2010 to 2050 as the baseline. ABAG staff stated in their July 9, 2020 meeting materials that this approach is consistent with how long-range forecasts have been used in past methodology development. The advantages of this baseline were summarized by ABAG staff this way (July 9, 2020, HMC Meeting #8, Item 6a, Attachment A, Page 3):

- Simple and straightforward to implement and discuss (e.g., “the methodology aligns with growth predicted by Plan Bay Area 2050”)
- Integrates transit, hazards, and market feasibility through strategies and modeling
- Better aligned with Plan Bay Area 2050
- Emphasis on current and future employment development patterns leads to RHNA allocations more focused in Silicon Valley, region’s largest job center
- Higher RHNA allocations in high resource areas near major job centers – notably in the South Bay

Belvedere endeavors, within its significant topographical constraints, to encourage the development of new housing. Without modification, however, the recommended HMC methodology would result in unrealistic housing quotas during the 2023-2031 RHNA cycle that would be impossible to achieve. It is common knowledge that setting impossible goals reduces the incentive to reach any goal at all. Accordingly, we strongly urge that you rethink the allocation methodology as indicated above.



We appreciate your consideration of these comments. Do not hesitate to contact us if we can be of further assistance.

Best Regards,

A handwritten signature in blue ink, reading "Nancy Kemnitzer". The signature is fluid and cursive, with a long horizontal stroke at the end.

Nancy Kemnitzer  
Mayor



**City of Brisbane**  
50 Park Place  
Brisbane, CA 94005-1310  
(415) 508-2100  
(415) 467-4989 Fax

November 25, 2020

Public Information Office  
ABAG-MTC  
375 Beale Street, Ste. 800  
San Francisco CA 94105

Subject: Proposed RHNA Methodology and Subregional Shares

To Whom It May Concern:

The City of Brisbane is writing in opposition to the Plan Bay Area 2050 (PBA 2050) Households as the baseline for the proposed regional housing needs allocation (RHNA) methodology. While the City understands the rationale for utilizing the projections from draft PBA 2050, as applied to Brisbane it results in an unrealistic allocation based on inaccurate information of the available developable land in the City. And ultimately, this outsized burden on Brisbane will result in less housing production in the Bay Area region overall at a time when our state critically needs it.

There are important limits on Brisbane's ability to dramatically expand in size. The Baylands, the City's largest opportunity site for future housing, includes areas that are not suitable for housing development, not because of local preferences but due to environmental hazards and existing regional uses that cannot be diverted to other jurisdictions. Brisbane's dramatic increase in growth projections in the PBA 2050 model are largely driven by the assumption that the entire Baylands area and areas designated with existing uses are available for housing development. It is critical that ABAG-MTC account for these limitations and develop realistic planning projections that will actually serve to expand housing availability.

Specifically, the Brisbane Baylands includes an unregulated landfill that is environmentally hazardous and unsuitable for housing development. This accounts for a significant portion of the Baylands, covering roughly 364 acres. The clean-up required is significant and based on a previous EIR of the area would take the better part of a decade to remediate. Even then, the existing developer has expressed no intention of putting housing on that property due to these hazards. In fact, the state's High Speed Rail Authority has identified the Baylands landfill as a critical location for a train maintenance facility as they develop the peninsula portion of the rail line. These plans demonstrate the point that the landfill area of the Baylands is best suited for industrial use, not housing development.

In addition, Brisbane is home to existing critical infrastructure for the Bay Area region that also needs to be removed from consideration as areas available for housing development. The Recology facility which processes waste from San Francisco, the PG&E energy substation just west of the Baylands, and the tank farm which houses fuel used for San Francisco International Airport are all existing uses that are obviously not appropriate for housing development. PBA 2050 does not take those uses into consideration in developing the projections for Brisbane.

*Providing Quality Services*

The Baylands also contains a variety of sensitive wildlife habitats, including aquatic resources such as Guadalupe Channel and Brisbane Lagoon, and an endangered species habitat on Icehouse Hill which will limit housing development on the property. None of these factors were adequately taken into account in the projections for PBA 2050 that will ultimately inform the final RHNA allocations.

The City's objections to the proposed methodology is not an indication that the City is unwilling to do its part to address the regional housing shortage. In 2018, the residents of Brisbane voted to amend its General Plan to permit the development of housing on the Baylands and approximately double its population and number of housing units. No other City in the region has made this type of bold commitment to help solve the housing problem. And again, the City's residents did this knowing the development of the property, given the significant environmental impacts on the Baylands, will be a huge undertaking for the City in conjunction with the landowner.

PBA 2050 however, projects more than 9,000 households in Brisbane by 2050 where the City currently has approximately 1,900 households. That proposed methodology applied to this RHNA cycle would generate an estimated allocation of 2,819 units, within a single 8-year RHNA cycle. The previously rejected Modified Option 8A that some jurisdictions are advocating would result in Brisbane being saddled with 7,591 units of housing in one RHNA cycle. For context, our current RHNA obligation is 83 units of housing, and we've already started planning for more than 1,800 units. The PBA's projection that the City quadruple this commitment is absolutely unrealistic given the geography of the City and impossible given the decades and costs of the environmental cleanup that would be required before most parts of the Baylands could even be made suitable for housing. The lack of adequate consideration of these constraints in PBA 2050 creates a starting point for Brisbane that sets our City up to fail and to suffer the funding penalties for failure.

The RHNA consequences of relying on these figures will be dire for the City of Brisbane. Establishing such an unattainable target will not increase housing production or further fair housing as the statutory objectives for the regional housing allocation require. Instead this target will put Brisbane in a perpetual state of failure that has real consequences for our residents that affect City planning, housing development allowances, and economic investment in the area. And when Brisbane is unable to meet this impossible allocation, it will mean the entire region continues to lag behind appropriate planning and development overall.

Do not confuse the City's objections to the proposed methodology as an indication that the City of Brisbane is unwilling to do its fair share (and more) to address the regional housing problem. We stand ready to do that in an environmentally responsible manner. In this spirit, the City of Brisbane looks forward to continuing these conversations with ABAG and getting to a result that is achievable for the City and the region.

Thank you for your consideration.

Sincerely,

A handwritten signature in dark ink, appearing to read "T O'Connell", written in a cursive style.

Terry O'Connell  
Mayor, City of Brisbane



THE TOWN OF  
CORTE MADERA  
MARIN COUNTY CALIFORNIA

300 TAMALPAIS DRIVE  
CORTE MADERA, CA  
94925-1492

[www.townofcortemadera.org](http://www.townofcortemadera.org)

TOWN MANAGER  
TOWN COUNCIL  
415-927-5050

TOWN CLERK  
415-927-5085

FINANCE / BUS. LICENSE  
415-927-5055

FIRE DEPARTMENT  
415-927-5077

PLANNING / ZONING  
415-927-5064

BUILDING INSPECTOR  
415-927-5062

TOWN ENGINEER  
PUBLIC WORKS  
415-927-5057

RECREATION DEPARTMENT  
415-927-5072

SANITARY DISTRICT NO. 2  
415-927-5057

CENTRAL MARIN  
POLICE AUTHORITY  
415-927-5150

October 6, 2020

Mayor Jesse Arreguín, President  
Association of Bay Area Governments, Executive Board  
375 Beale Street, Suite 700  
San Francisco, CA 94105-2066

Dear Board President Arreguín:

On behalf of the Town Council of the Town of Corte Madera, please accept our comments related to the proposed Regional Housing Needs Allocation (RHNA) methodology recommended by the RHNA Housing Methodology Committee (HMC). Please consider these comments in advance of the October 15, 2020 ABAG Executive Board meeting where the recommended methodology will be discussed.

The Town of Corte Madera appreciates the efforts and dedication of the diverse stakeholder group of HMC members over the last year in attempting to make a collective recommendation regarding the appropriate distribution of 441,000 new housing units within the region and understands the urgency and challenge of addressing regional policy goals related to housing affordability, climate change and equity in this RHNA cycle. Unfortunately, however, the methodology recommended by the HMC allocates new housing units to areas that lack adequate transportation infrastructure, away from existing and future job centers, and into areas at risk of sea level rise and wildfire in quantities inconsistent with the growth patterns and policy objectives more carefully considered in Plan Bay Area 2050. As a result, the recommended methodology and resulting RHNA, if indeed intended to set realistic quotas for housing growth regionally, will not only fail to meet the Bay Area's total regional housing need, but will threaten our region's ability to grow sustainably into the future.

Our conclusions may be best illustrated by the fact that, pursuant to the proposed HMC methodology, the Town of Corte Madera is expected to experience an 18% household growth rate from 2019 as a result of the 2023-2031 RHNA. This is a greater growth rate than Berkeley and Oakland in the East Bay (16% and 17% respectively), San Mateo and Redwood City on the Peninsula (17% each), and significantly greater than San Rafael and Santa Rosa in the North Bay (12% and 10% respectively), yet Corte Madera lacks a Major Transit Stop and is expected to lose approximately 3,000 jobs (or approximately 43% of its current jobs) by 2050 according to the Plan Bay Area 2050 Draft Blueprint.

Other similarly situated cities in Marin and the region are expected to grow at similarly high relative growth rates between 2019 and 2031, despite Plan Bay Area 2050 projections to the contrary. The result is to push a greater proportion of new development into areas that will promote auto dependency and longer commute times, exacerbate GHG impacts, and run counter to the goals and objectives well-formulated and strongly articulated in the recently released Plan Bay Area Blueprint. Additionally, for Corte Madera, it means pushing housing



growth into areas that are either increasingly at risk due to projected sea level rise or wildfire since the vast majority of Corte Madera's geographic area is in either FEMA's 100-year flood plain or the Wildland Urban Interface (WUI).

To reduce the negative effect of the proposed HMC RHNA methodology, we recommend consideration of both of the following changes to the recommended methodology:

- *Utilize Plan Bay Area 2050 household (HH) growth rates between 2019 and 2050 as the baseline for the RHNA allocation rather than Plan Bay Area HHs in 2050.*

Utilizing the PBA 2050 household growth rate as the baseline will align RHNA more closely with Plan Bay Area Blueprint objectives related to reducing GHG emissions by focusing a greater proportion of growth to areas where transportation investments, job growth, and beneficial market conditions are expected to exist. This proposed change to the HMC methodology is supported by many other Bay Area jurisdictions who have also provided public comments and was supported by ABAG staff in its July 2020 report to the HMC.

- *Reduce the 40% allocation factor to High Resource Areas for moderate and market rate units utilized in Recommended Option 8A*

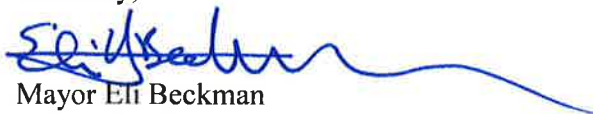
While not clear from the presentation materials provided to the HMC, it appears that the 70% allocation factor for very low and low-income units, and the 40% allocation factor for moderate and market rate units, are driving a significant number of additional units to High Resource Areas, such as Corte Madera, beyond that anticipated in Plan Bay Area 2050. It is not clear how the 40% allocation factor for moderate and market rate units helps further the equity purpose the HMC intends, as it would appear to drive relatively more higher income households to High Resource Areas. Reducing or eliminating this allocation factor would presumably reduce the overall housing allocation to jurisdictions like Corte Madera without affecting the strategy the HMC proposes to introduce greater equity into the RHNA process.

While we again recognize the challenge that the HMC faced in developing an appropriate allocation methodology, and appreciate many of the thoughtful contributions they have introduced into the process, we believe the outcomes of the recommended methodology, without modifications, *do not further the statutorily mandated objectives of RHNA and are inconsistent with Plan Bay Area 2050 objectives* that aim to grow the Bay Area sustainably and allocate scarce resources efficiently.

As one of the few Bay Area jurisdictions to meet and exceed its current 5<sup>th</sup> Cycle RHNA allocation with respect to all income categories, Corte Madera believes that there is room in our community to thoughtfully develop new housing that both helps to address the region's affordability and equity issues and improves the quality of our Town. Without modification however, the recommended HMC methodology presents wholly unrealistic housing quotas over the 2023-2031 RHNA cycle which appear to simply be a punitive attempt to set higher resource communities up for failure and state-imposed land use controls and penalties.

We thank you for your time and consideration.

Sincerely,



Mayor Eli Beckman  
Town of Corte Madera



November 25, 2020

ABAG/MTC Public Information Office  
375 Beale Street, Suite 800  
San Francisco, CA 94105  
[RHNA@bayareametro.gov](mailto:RHNA@bayareametro.gov)

**RE: Proposed RHNA Methodology and Subregional Shares**

The City of Campbell would like to recognize the Housing Methodology Committee (HMC), Regional Planning Committee and ABAG Executive Board for their efforts to adopt a fair and accurate Regional Housing Needs Allocation (RHNA) Methodology to assign an identified housing need of 441,176 units for the Bay Area.

Understanding the impact that housing allocations will have on the Bay Area, the Campbell City Council received a presentation on the proposed RHNA Methodology and regional shares at their November 17, 2020 meeting. Having had the opportunity to review the proposed RHNA Methodology, the City Council seeks to highlight an ongoing issue with the accuracy of 2050 Household data reflecting forecasted growth from the Plan Bay Area 2050 (PBA 2050) Blueprint expanding on points raised in an August 5, 2020 letter to the ABAG/MTC Executive Director (see **Enclosure 3**) and identify concerns with the criteria used to establish Transit-Rich and High-Resource areas.

To summarize points raised in the August 5<sup>th</sup> letter, growth geographies used to derive the 2050 Household growth forecasts included areas that are unlikely or unable to be developed in the next 40 years. Since growth geographies assume increased housing production for qualifying Priority Development Areas (PDAs), Priority Production Areas (PPAs), Transit-Rich-High-Resource Areas (Outside PDAs), Transit-Rich Areas (Outside PDAs) and High Resource Areas (16-30 minute bus; Outside PDA) it is critical to ensure that the areas included are feasible before assigning a growth factor (i.e. for every 'x' acres of qualifying area, regardless of development potential, a population growth factor of 'y' shall be assumed). To ground the importance of this exercise, adopted Housing Elements are placed under a great deal of scrutiny by HCD to ensure that areas designated for housing development can in fact support the units assigned by a jurisdiction. Similarly, and recognizing that the Draft RHNA Methodology will be sent to

HCD for review, it is of paramount importance to ensure that areas assigned an increased growth factor are reviewed by a similar standard to ensure the 2050 Household data growth forecast, and the RHNA methodology, which uses its data as a baseline, are consistently sound in their application.

Recognizing that not all areas can be developed and transitioning that logic to the City of Campbell geography, the following should be considered as 'exclusions' from the eligible area calculations of the PBA2050 growth projections (only some of these, such as roadways, have been excluded):

- Open Space/Los Gatos Creek Trail
- Valley Water Percolation Ponds
- Existing Special Needs and Affordable Housing (per AB-1397 which severely restricts the use of housing opportunity sites identified in the previous RHNA 5 Cycle)
- Campbell Community Center
- Campbell Civic Center
- Public and County Parks
- Schools
- Churches
- Senior Housing (i.e. Merrill Gardens, Rincon Gardens, Wesley Manor)
- Underground Aquifers
- Natural Waterways
- Job Centers (that will not be removed due to its high improvement costs; e.g., 8x8 Inc., Hamilton Plaza)
- Highways, Expressways, Roads
- PG&E Substations
- Properties redeveloped in the last 20 to 30 years

The maps attached to this letter illustrate some of the itemized areas for exclusion. A summary of each map and its general purpose is as follows:

1. Exclusion Areas Map: This map provides an overview of areas within growth geographies planned around light rail which should be excluded based on some of the items provided in the list above (see **Enclosure 1**). Areas shown with a red crosshatch reflect areas that are inaccessible to existing light rail stations. Areas shown with a green crosshatch reflect areas which should be omitted since they rely on the construction of a light rail station that is no longer proposed by VTA (see **Enclosure 4**). Based on this analysis, while 2,209 acres may be planned for higher growth, less than 55% (1,228 acres) of that area may be able to accommodate redevelopment.



2. Recently Developed Properties Map: This map highlights properties within the growth geographies planned around light rail which should be excluded on the basis they are unlikely to be developed having been built in the last twenty years (2000 to 2020 ~ 72.5 acres) to thirty years (1990 to 1999 ~ 54 acres) (reference **Enclosure 2**).

In addition to the above geography characteristics which should be excluded from future growth forecasts, the City of Campbell is comprised of relatively small parcels which will make it virtually impossible, outside a mandated eminent domain program, to assemble multiple properties to achieve the anticipated growth projections.

Further, the Campbell City Council believes that other jurisdictions have unique geographies as well and, therefore, had requested that the 2050 Households data be modified to reflect individual jurisdictions' land constraints. The City believes these changes could easily be made by requesting each jurisdiction to prepare a formal list of excluded properties to be considered in the underlying data without undermining the HMC methodology. Recognizing local constraints, the City of Campbell prepared its own map illustrating properties within the growth geographies which should have been excluded as previously noted (see **Enclosure 1 & 2**). For Campbell the 2050 Household data also assumed the construction of the Hacienda and Vasona Light rail stations. As you may be aware, the Santa Clara Valley Transportation Authority (VTA) Board voted to place the Vasona Light Rail Extension and Corridor Improvement Program on an indefinite hold at its September 5, 2019 meeting (see **Enclosure 4 – Santa Clara VTA Board of Directors September 5, 2019 Meeting Minutes**). Considering the fact that the Vasona Light Rail Extension had been contemplated for over two decades and has been found to be infeasible by the VTA in 2019, population projections which rely on its construction should be removed from the 2050 Household baseline since there are no longer plans to extend the light rail.

Separately, the City understands the HMC methodology relies on the underlying use of Plan Bay Area 2050 and, by extension, the criteria used to establish Transit-Rich and High-Resource Areas. The City has identified concerns with the criteria used to establish both categories as follows:

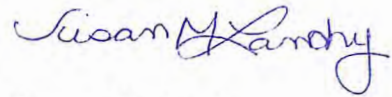
- Transit-Rich Areas: Recognizing that buses do not travel on fixed rails and change headway schedules, routes, and rates frequently based on ridership (changing several times over the last few years, and more recently in response to COVID-19) it is not appropriate for the City, or growth forecasts to plan for development reliant on such routes without assurance that the schedules, routes and rates used in the studied areas would remain for the plan period.
- High-Resource Areas: These areas are generally encumbered by high costs of living and dense populations. The City understands that high living costs are



detrimental to low-income households and can limit a family's the upward economic mobility in an area that limits such opportunities. However, most of Campbell's neighborhoods are not densely developed or populated with properties averaging in size of approximately 6,000 square feet. In order to achieve a site capable of accommodating sufficient land necessary to realize greater density, multiple parcels would have to merge. Relying on willing property owners to sell will result in a realistic obstruction to this goal. Unless the City adopts an eminent domain program to take private property for housing production, the growth projection will be found unrealistic.

By accounting for these considerations, the City believes a fairer and more accurate outcome will be established, which in turn will result in a more appropriate projected assignment of housing unit production, and an outcome that is ultimately more in line with the objectives of ABAG/MTC. Moving forward, the City would also like to express an interest in participating in the Plan 2050 Implementation Phase discussions with ABAG/MTC to understand expectations for cities to incorporate best practices into policy documents.

Sincerely,



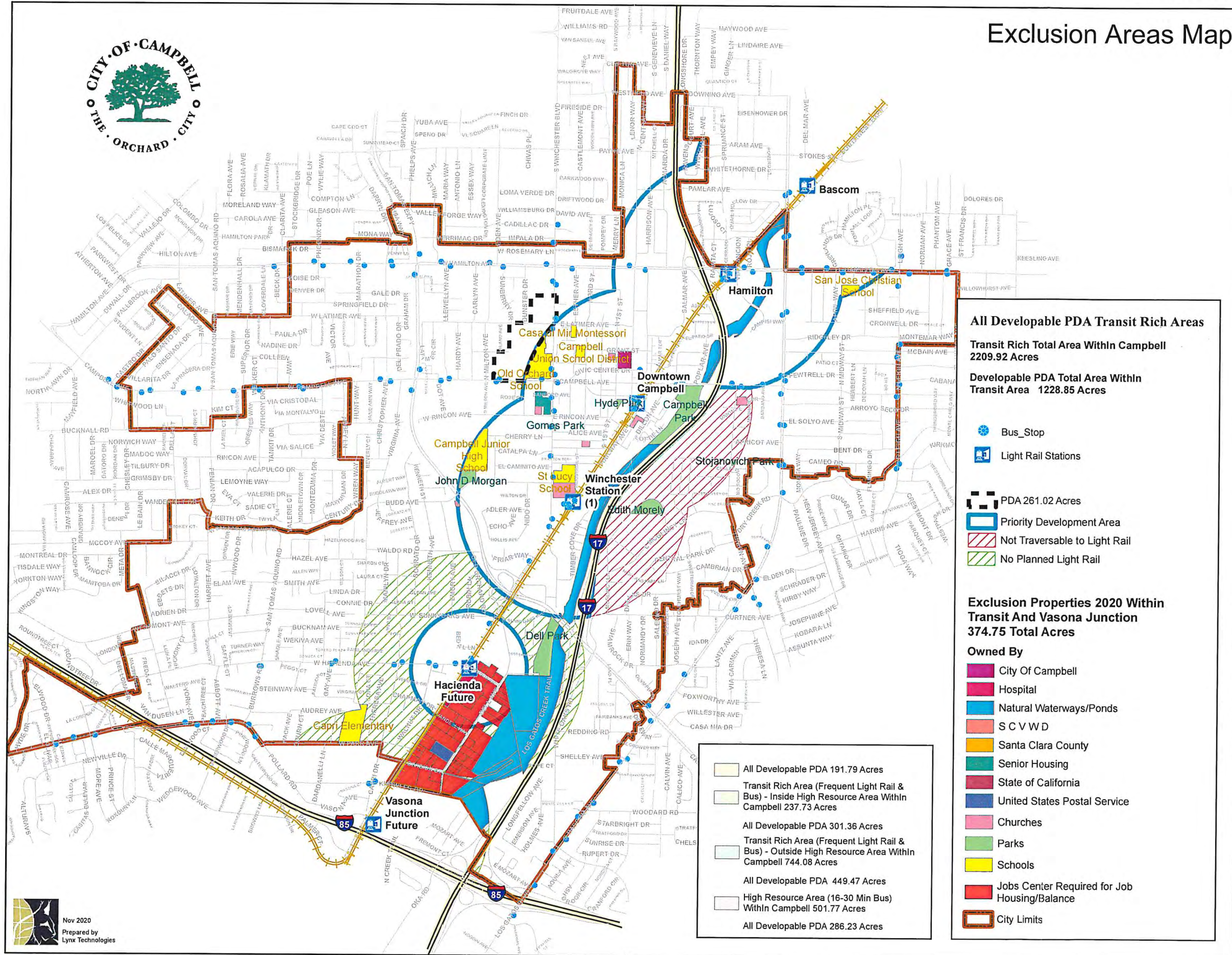
Susan M. Landry  
Mayor, City of Campbell

Enclosures:

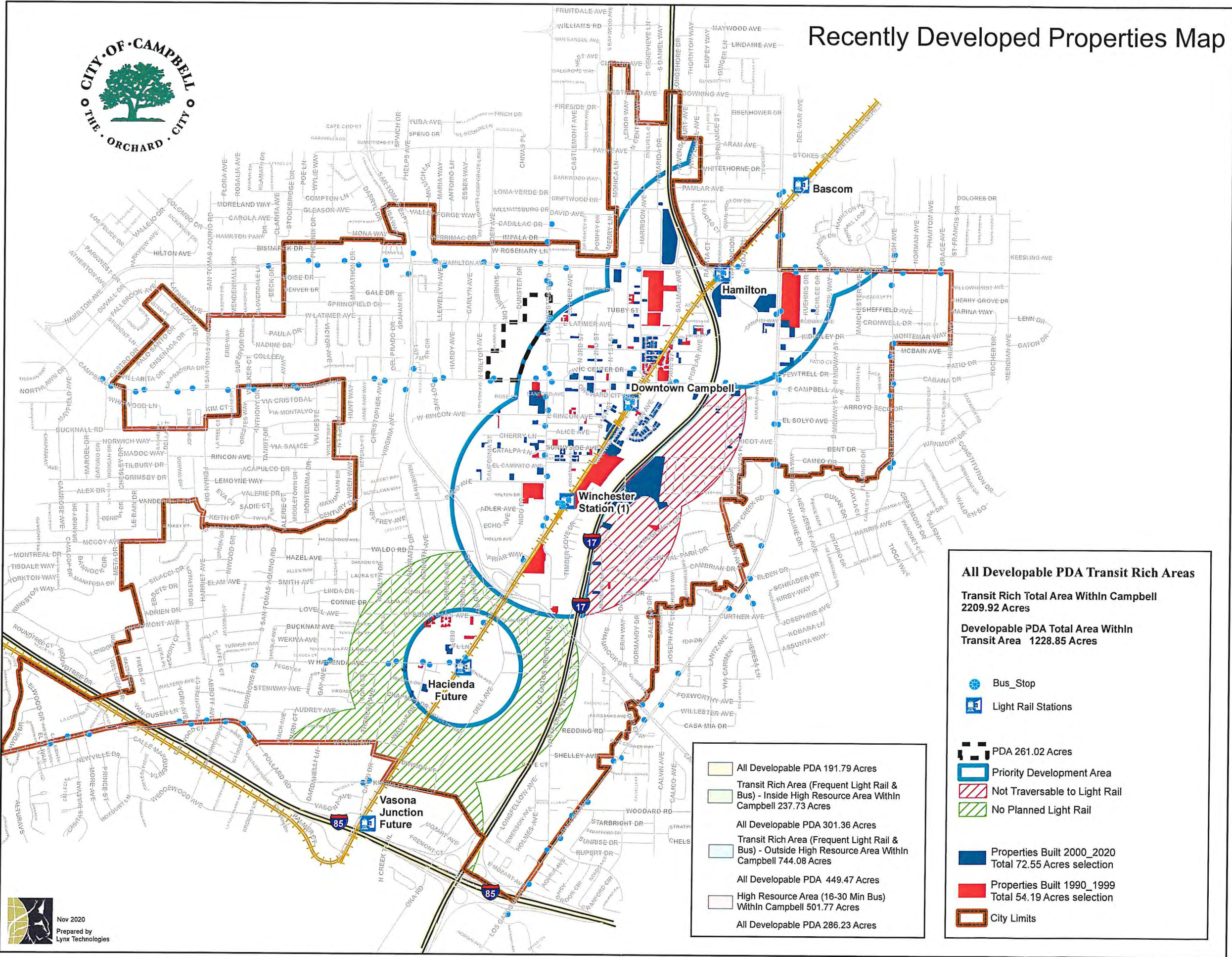
1. Exclusion Areas Map
2. Recently Developed Properties Map
3. August 5, 2020 letter to the ABAG/MTC Executive Director
4. Santa Clara VTA Board of Directors September 5, 2019 Meeting Minutes

cc: ABAG Executive Board  
Bay Area Metro Center  
375 Beale Street, Suite 800  
San Francisco, CA 94105-2066













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**CITY OF CAMPBELL**  
**Mayor's Office**

August 5, 2020

Therese McMillan  
ABAG/MTC Executive Director  
Bay Area Metro Center  
375 Beale Street  
San Francisco, CA 94105

Re: Plan Bay Area 2050: DRAFT Blueprint Growth Geographies

Dear Ms. McMillan:

The City of Campbell has had an opportunity to review the Draft Blueprint Growth Geographies that were prepared as part of the Plan Bay Area 2050 (PBA2050) development process. Understanding the Association of Bay Area Governments' (ABAG) and the Metropolitan Transportation Commission's (MTC) role in regional housing and transportation planning, the City Council received a presentation of the PBA2050 material at their July 21, 2020 meeting. Several growth geographies mapping observations were discussed and the City of Campbell City Council requests that you review these observations and consider modifications to the Draft Blueprint Growth Geographies.

The City understands that the use of Priority Development Areas (PDAs) and Priority Production Areas (PPAs) in the Growth Geographies are intended to improve the PBA2050's ability to meet challenging GHG reductions, housing and equity requirements. As you are aware, the City has one locally designated PDA which encompasses approximately 265 acres and it is centered primarily within Downtown Campbell and its surrounding two light rail stations (See **Exhibit A**). The vast majority of the City's existing PDA area identifies developable lands, except for the Campbell Community Center and a small portion of Los Gatos Creek. These areas have been the City's focus for housing production opportunities as reflected in the City's Housing Element.

Despite being the densest City in Santa Clara County, the City strives to be proactive in encouraging housing and commercial development. From review of the growth

geography maps, it appears several communities less developed than Campbell are planned for less development. The City believes growth expectations should take existing density into account to ensure growth is equitable. Specific to housing development, the City has policies requiring 15% of units in developments with 10 or more units to be affordable, and 20% of all units in developments with 5 units or more units to be 'accessory dwelling unit ready'. While the City continues to hear that communities are to blame for development delays, a considerable amount of delay is caused by developer delay in response to correction requests. It should also be recognized that despite the best intentions of a community, a City cannot force a developer to build or a property owner to sell their property and communities should not be penalized for actions outside of their control.

PDA Map & Eligible Acres Table: In review of the '[Spring 2020 Priority Development Area \(PDA\) Letter of Interest Guide Map](#)' which was used to generate the [PDA-Eligible Acres Table](#) it was found that the map included the Vasona and Hacienda as future stations. As you may be aware, the Santa Clara Valley Transportation Authority (VTA) Board voted to place the Vasona Light Rail Extension and Corridor Improvement Program on an indefinite hold at its September 5, 2019 meeting. As such, the baseline data used to determine the number of PDA eligible acres for the City of Campbell (2,621 acres), and potentially for other communities as well, was inaccurate and should be recalculated prior to including Transit-Rich Areas (TRAs) and High-Resource Areas (HRAs) in the studied growth geographies.

Further, while the City recognizes the opportunity provided by the Horizon Initiative to provide feedback on baseline data – baseline data should be recognized as a moving target when undertaking a multi-year study and should be reevaluated for accuracy and to account for stakeholder feedback up until the point Plan Bay Area 2050 is adopted. In review of the baseline data, the City believes Housing Elements should have been taken into consideration recognizing that opportunities exist outside of the PDA areas (i.e. identified housing opportunity sites) – particularly for communities with less than 50% of their PDA eligible acres designated. Further, recognizing that buses do not travel on fixed rails and change schedules, routes, and rates frequently based on ridership (changing several times over [last few years](#), and more recently in response to [COVID-19](#)) it is not appropriate for the City, or Plan Bay Area 2050 to plan for development reliant on such routes without assurance that the schedules, routes and rates used in the studied areas to establish potential PDA Map and Eligible Acres Table as well as the Draft Blueprint Growth Geographies would remain for the plan period.

Draft Blueprint Growth Geographies for Study: Review of the Draft Blueprint Growth Geographies mapping exercise reveals an underlying assumption that the areas falling within designated areas are directly correlated with a jurisdiction's ability to promote future housing and job growth within said areas. While this may be true in part and the City remains in support of assessing future growth opportunity areas, it is important to

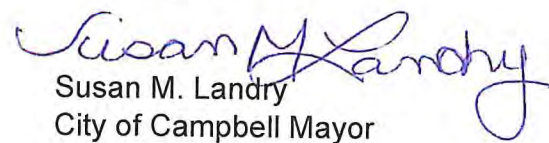


recognize that not all 'acreage' can be developed. For example, if one were to analyze a coastal city and measured a one-half (½) mile radius around its downtown core, the ocean would be included in the jurisdiction's acreage calculation despite its inability to be developed. Recognizing that not all areas can be developed and applying that logic to the City of Campbell geography, the following should be considered as 'exclusions' from the eligible area calculations. For ease of reference these areas have been graphically depicted in the enclosed attachment<sup>1</sup> (reference **Exhibit B** – City of Campbell Exclusion Map).

- Public Parks (already understood to be excluded)
- Open Space, Los Gatos Creek, and the Los Gatos Creek Trail
- Valley Water Percolation Ponds
- Existing Special Needs and Affordable Housing (per Assembly Bill 1397)
- Campbell Community Center
- Campbell Civic Center
- Priority Conservation Areas (PCAs)
- Schools
- Churches
- Highways, Expressways, Roads
- PG&E Substations
- Recently developed properties (it is unlikely for new development to be redeveloped in the next 40 years)

The Campbell City Council believes that other jurisdictions have unique geographies as well and, therefore, requests that the Draft Blueprint Growth Geographies be modified to reflect individual jurisdictions' land constraints in forming the PDA-Eligible acres. In this regard, the final Plan Bay Area 2050 document will be a more accurate depiction of housing and job growth projections.

Sincerely,

  
Susan M. Landry  
City of Campbell Mayor

Encl:

Exhibit A – City of Campbell PDA Map  
Exhibit B – City of Campbell Exclusion Area Map

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<sup>1</sup> Areas in white have been removed from the growth geographies based on the criteria listed with the exception of recently developed properties which are shown in red or blue based on construction date information.



City of Campbell PDA Map

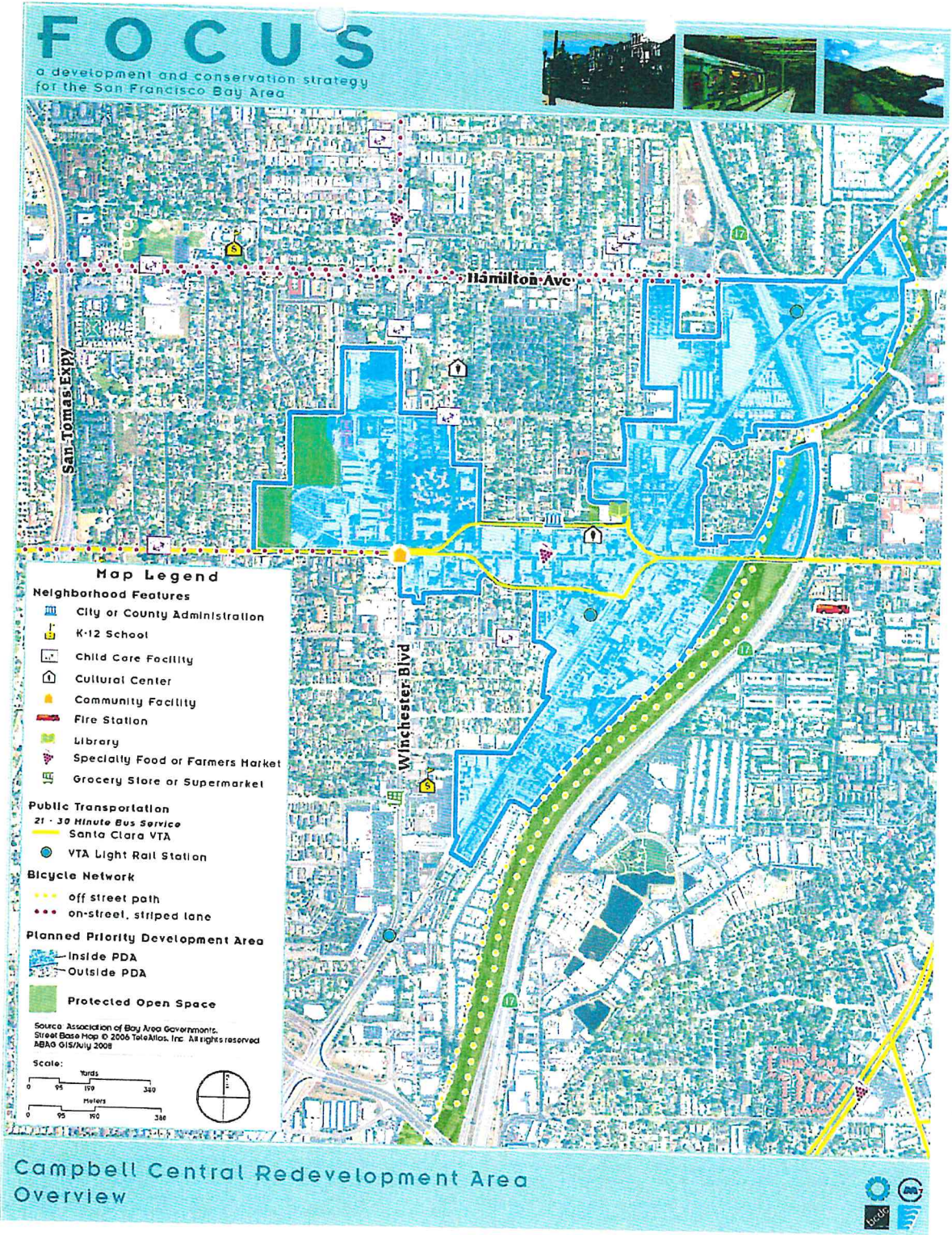




Exhibit A

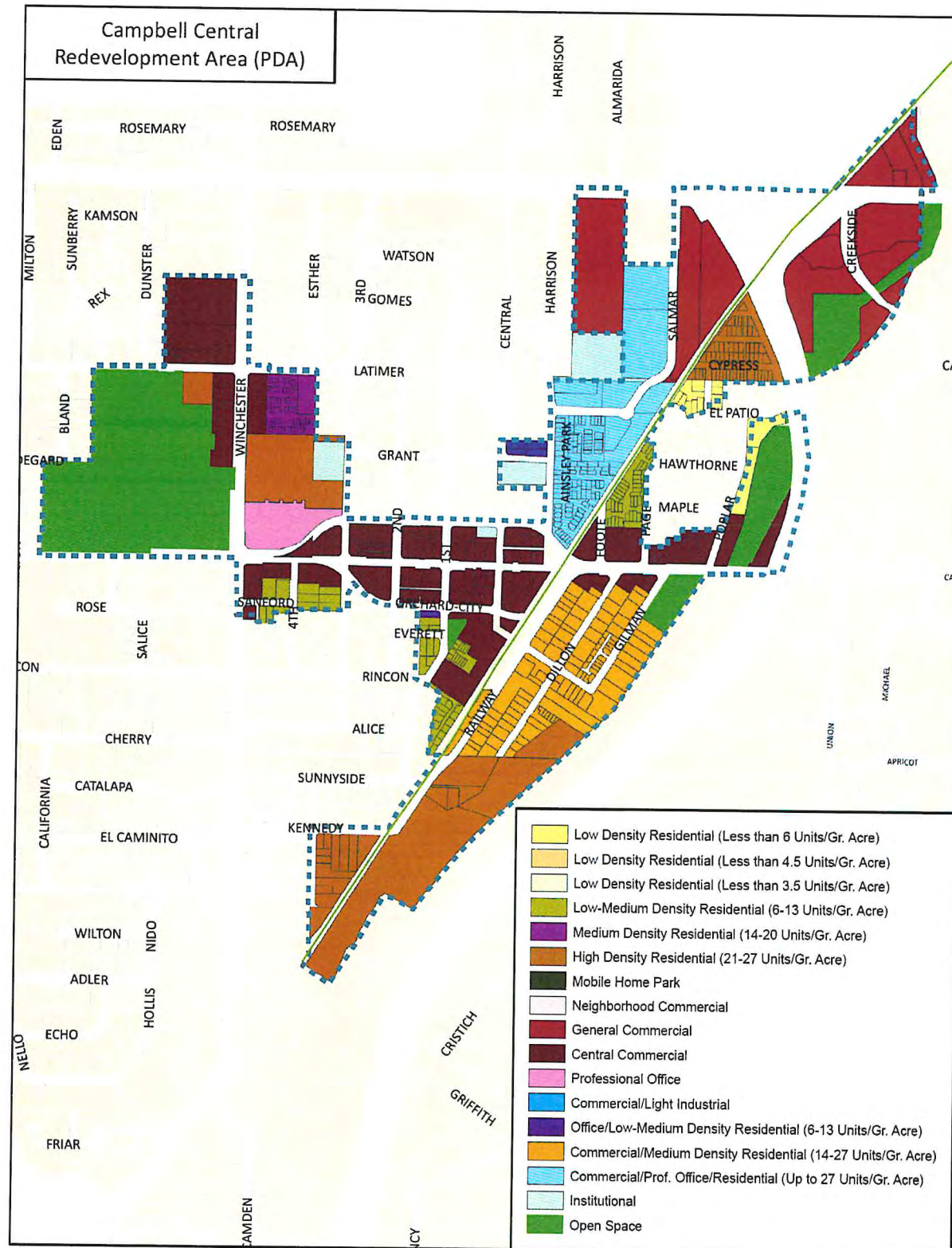
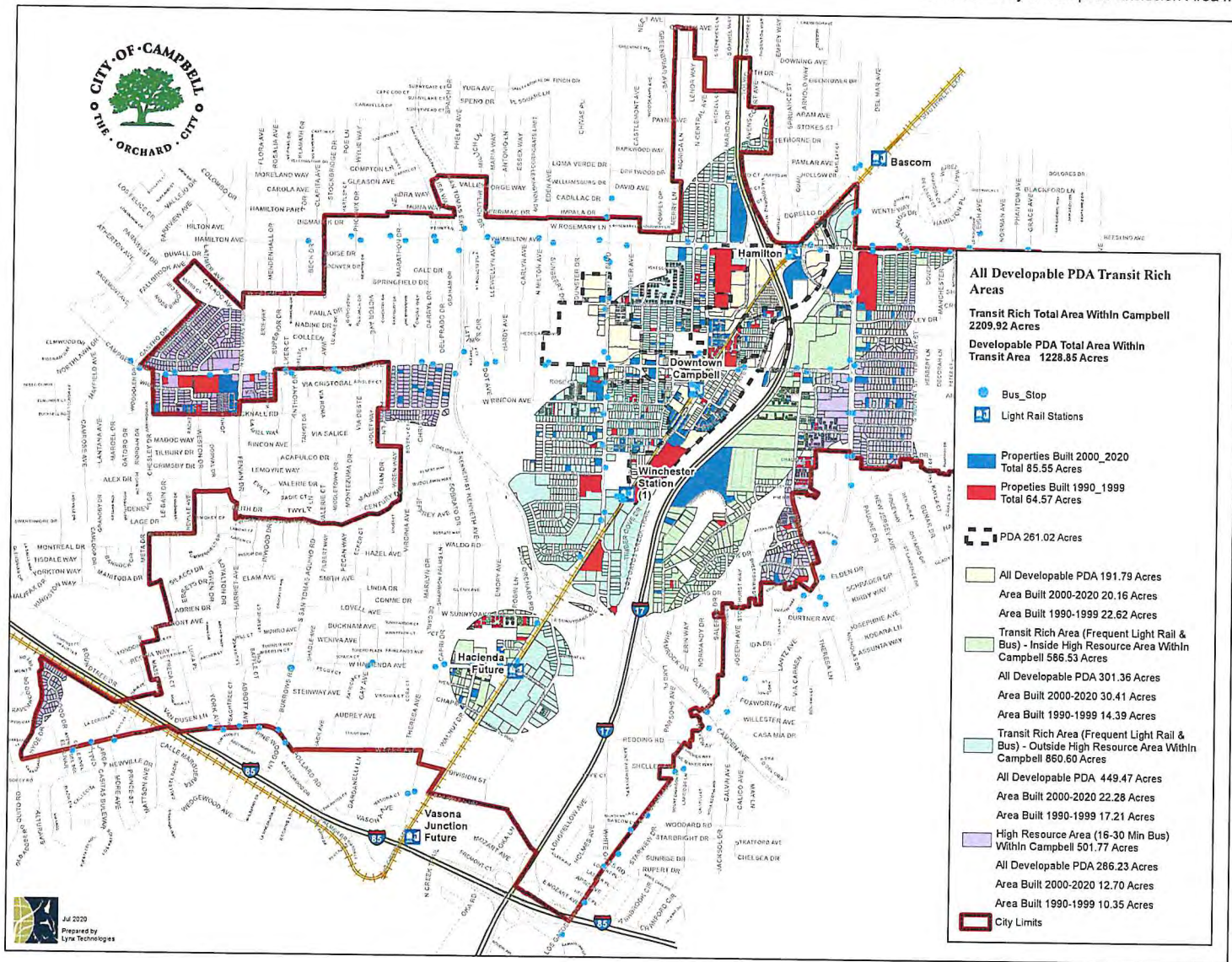




Exhibit B – City of Campbell Exclusion Area Map



**MINUTES**  
**BOARD OF DIRECTORS**  
Thursday, September 05, 2019

**Public Comment**

Mr. Boone expressed he does not support BART extension to Santa Clara.

Mr. Lebrun made the following comments: 1) the level of transparency and clarity on how money is being spent on the BART Phase I extension; and 2) expressed concern with the amount spent for professional services.

**On Order of Chairperson O'Neill** and there being no objection, the Board of Directors received an update on VTA's BART Silicon Valley Program Budget.

**7.3 Vasona Corridor Light Rail Extension and Corridor Improvements Study**

Jason Kim, Sr. Transportation Planner, provided a presentation entitled "Vasona Conceptual Engineering Update."

Board Member Tran left his seat at 7:15 p.m.  
Board Member Tran returned to his seat at 7:23 p.m.

Members of the Board discussed adding one station at West San Carlos without the full extension.

**Public Comment**

Kevin Kittila, Interested Citizen, made the following comments: 1) expressed support for putting the project on hold; and 2) halt the BART to San José Project until the money is available.

Mr. Lebrun commented on the following: 1) expressed concern that light rail is being discussed and not new technology; and 2) inquired about the study cost.

**M/S/C (Davis/Chavez)** to approve placing the Vasona Light Rail Extension and Corridor Improvements program on hold, discontinuing further project development activities and corresponding expenditures until operating needs warrant reopening the project.

|                  |  |
|------------------|--|
| <b>RESULT:</b>   | <b>APPROVED – Agenda Item #7.3</b>   |
| <b>MOVER:</b>    | Dev Davis, Alternate Board Member  |
| <b>SECONDER:</b> | Cindy Chavez, Vice Chairperson   |
| <b>AYES:</b>     | Carr, Carrasco, Chavez, Cortese, Davis, Liccardo, McAlister, O'Neill, Rennie, Tran |
| <b>NOES:</b>     | None   |
| <b>ABSENT:</b>   | Jones, Peralez   |

**7.4 Final Draft Response to the 2018-2019 Civil Grand Jury Report**

Jim Lawson, Chief External Affairs Officer, provided an overview of the staff report, noting the change made by the Governance & Audit Committee.





## TOWN OF COLMA

1198 El Camino Real • Colma, California • 94014-3212

Tel 650.997.8300 • Fax 650.997.8308

November 12, 2020

Ms. Karen Mitchoff, Chair  
ABAG Regional Planning Committee  
c/o ABAG-MTC Public Information Office  
375 Beale St, Suite 800  
San Francisco, CA 94105

VIA EMAIL

### **RE: Town of Colma RHNA Methodology Allocation**

Dear Chair Mitchoff:

The Town of Colma would like to comment on the proposed methodology for the RHNA 6 cycle and the draft subregion shares passed by the Executive Board at their meeting on October 15, 2020. The Town respectfully requests that the Town's RHNA allocation be substantially adjusted downward based on the information provided in this letter. We believe that the Methodology Committee drastically erred in its allocation for Colma by not properly considering RHNA Methodology Factor 2, Constraints to Development. In addition, while Colma is considered a transit-rich location, development opportunities are limited due to the encumbrance of 73% of the Town's land area for cemetery use and essentially no vacant land.

If proposed methodology scenario 8a is adopted, the Town will receive an allocation of 183 units. This represents a three-fold increase from the Town's allocation of 59 units from the RHNA 5 allocation and represents an unattainable and unrealistic 36% increase in the Town's total housing stock which developed over more than a 70-year period. The Town was able to satisfy its RHNA 5 housing goal by the development of the Town's only substantial designated housing site with a 66-unit affordable housing project for Veterans. The Town supports the development of housing where feasible.

#### *Constraints to Development*

The Town of Colma is less than 2 square miles with a resident population of approximately 1,500 people. The Town was incorporated in 1924 to protect cemeteries from the forced

John Irish Goodwin, Mayor  
Diana Colvin, Vice Mayor

Helen Fisicaro, Council Member • Raquel P. Gonzalez, Council Member • Joanne F. del Rosario, Council Member  
Brian Dossey, City Manager

relocations that occurred in San Francisco. Approximately 73% of the Town's land area is in cemetery use or planned cemetery use and cannot legally be used for any other purpose. The Town believes that the Methodology Committee should have applied a substantial offset to housing production based on the objective reality of Colma's unique land use constraints.

RHNA Methodology Factor 2, Constraints to Development, item C, excludes lands preserved or protected from urban development under existing state or federal programs. While the primary focus of this factor is protection of agricultural lands and sensitive habitats, it also applies to cemeteries regulated by the California Cemetery and Funeral Bureau. Cemetery lands should be fully excluded from all modeling and land use scenarios.

*Inability to Meet State Housing Element Requirements*

The Town of Colma is pleased to have certified all previous Housing Elements with the State and has worked faithfully to meet its housing goals. The Town is concerned that the state may not accept the designation of potential housing sites in Colma which are not "vacant" and which may not develop within the 8 year time frame under the new site designation criteria. If the Town is unable to designate housing sites, the Town will not be able to request certification of our Housing Element. We have only two sites which we believe can accommodate approximately 60 units and meet the site selection criteria for the current RHNA cycle. While the Town is planning for and anticipates development of mixed-use housing on a couple of existing commercial sites in the long-term, the designation of these sites is premature since they are still occupied and have viable commercial uses.

For the reasons outlined above, the Town respectfully asks that you reconsider the allocation methodology and reduce the housing allocation for Colma. Thank you for your consideration, and this opportunity to provide comment.

Sincerely,

A handwritten signature in blue ink, appearing to read 'John Irish Goodwin', with a stylized flourish at the end.

John Irish Goodwin, Mayor

Cc: Jesse Arreguin, President, ABAG Executive Board  
San Mateo County Supervisor David Canepa  
Town of Colma City Council  
Christopher Diaz, Esq., City Attorney



November 24, 2020

Mayor Jesse Arreguín, President  
ABAG Executive Board  
Association of Bay Area Governments  
375 Beale Street, Suite 700  
San Francisco, CA 94105-2066

Dear President Arreguín:

On behalf of the City of Concord, I am submitting this letter in opposition to the proposed allocation methodology for the 2023-2031 Regional Housing Needs Allocation (RHNA). This letter is submitted during the public comment period that concludes on Friday, November 27, 2020.

As I stated in my letter dated September 17, 2020, I want to reiterate our appreciation to both the Housing Methodology Committee (HMC) and ABAG staff for their year-long effort of developing, preparing and considering RHNA methodologies. The work completed by staff to provide the HMC with detailed analysis to further informed decision-making was thorough and admirable considering the time constraints. We further appreciate the HMC's consideration of our input to date and utilizing the draft "Plan Bay Area 2050" as the baseline data methodology.

The City of Concord acknowledges that the ABAG Executive Board voted to support the Modified High Opportunity Areas Emphasis ("Option 6A") methodology at the October 15, 2020 meeting. At that meeting, the Executive Board considered a number of methodologies, each crafted from a combination of a variety of weighted "factors." As the Bay Area region continues to face a housing supply emergency, the preferred methodology supported by a majority of the Executive Board poses a significant concern to the City of Concord and other jurisdictions.

The supported methodology is problematic and is not the methodology that will result in the greatest opportunity to increase housing supply or address critical issues facing the region. The following are a summary of concerns that inform the City of Concord's opposition:

1. **Weighting the allocation on "high opportunity areas."** The preferred methodology includes factors that will drive the allocation of units to "high opportunity areas," rather than to urbanized areas where the vast majority of jobs have been created. As provided in methodology 6A, "high opportunity areas" could include areas with significant infrastructure constraints, greenfield development, poor proximity to transit, and areas that have been previously developed with lower-density residential uses. The

constraints that exist in many of these areas will not result in the actual production of residential units, thereby potentially intensifying the ongoing deficit of supply.

2. **Failure to comply with RHNA statutory objective to “Improve intraregional jobs-housing relationship.”** As previously stated in written and oral testimony, areas with the largest job growth from 2010-2016 have not produced their fair share of housing units in the region and the disparity between jobs and housing in some of the region’s communities is drastic and overtly inequitable. The City of Concord, being the city with the largest share of job generation in Contra Costa County, has also acknowledged a need for and has planned to accommodate production of its fair share of housing units.

A weighted allocation methodology that increases development pressures on suburban, exurban and rural areas is simply not consistent with the statutory objective of the RHNA process to *“improve the intraregional jobs-housing relationship.”*

3. **Lack of compliance with AB 32 and SB 375 by furthering sprawl.** Weighting the allocation methodology so heavily on “high opportunity areas” will simply exacerbate and encourage development in areas that do not have the carrying capacity to increase density, or will further inequities by causing lower-income households to increase commute times traveling from outlying exurban areas to job centers, which is contrary to the mandates of AB 32 and SB 375, whereby the State of California is required to reduce its greenhouse gas (GHG) emissions. In certain areas where significant environmental and infrastructure constraints such as a lack of viable water supply and sewer service exist, housing units will simply not be constructed due to the costs associated with impact mitigation.

Further, this level of focus on “high opportunity areas” is in conflict with the statutory objectives of RHNA, including *“Promoting infill development and socioeconomic equity.”*

4. **Negative impact on quality-of-life and transportation systems.** An allocation methodology that results in more units assigned to suburban, exurban and rural areas such as eastern Contra Costa County, unincorporated Solano, Napa and Sonoma Counties and southern Santa Clara County will exacerbate long commute times on overtaxed transportation systems, degrade quality of life and strength of community as workers spend more time away from their homes and families.

In summary, the City of Concord recognizes the critical need to address a statewide housing supply crisis, currently estimated to be a deficit of 3.5 million units. The acute nature of this shortfall requires cities and counties to reduce barriers and streamline processes to remove constraints and focus on high-quality, inclusive residential development of all types. We believe in factors that:

- a. **Allocate housing growth near job centers.** ABAG’s own analysis shows a clear indication that certain areas of job growth did not produce accordant level of residential development, by a significant margin, from 2010-2016. Allocating residential units to areas that have enjoyed significant job growth will reduce long commutes, and reduces GHG emissions and impact on already-taxed transportation systems. Increasing the number of units allocated to areas of significant job growth, such as urbanized areas of Santa Clara County, will provide additional opportunities for those that are working in lower-paying jobs – such as retail and service industries – to live closer to their employment.

- b. **Discourage housing growth in suburban, exurban and rural communities** where physical, environmental and infrastructure constraints are more likely to exist, as these areas are least likely to produce the needed housing units during the RHNA reporting period.
- c. **Sprawl negatively impacts health, environmental quality, quality-of-life, and strong, connected communities.** In increasing the weight of “high-opportunity areas” for a greater share of housing unit allocation, the practical outcome will result in an increase in development pressure on the outer fringes of the Bay Area region, where land is generally less expensive. Job generation, however, continues to be centered in San Francisco, Oakland, and urbanized areas of San Mateo and Santa Clara Counties. Reliance on this methodology will exacerbate sprawl into outlying areas – resulting in the region not meeting State-mandated GHG reductions – and continue to impact the health and quality-of-life of the workforce required to commute to job centers.

In consideration of the aforementioned factors, the City of Concord opposes the methodology supported by a majority of the ABAG Executive Board. Additional analysis of the preferred methodology is needed to understand the local, sub-regional and regional impacts of the final allocation.

Sincerely,



Tim McGallian  
Mayor  
City of Concord

CC: Concord City Council  
Valerie Barone, Concord City Manager  
Joelle Fockler, Concord City Clerk  
Andrea Ouse, AICP, Concord Community Development Director  
Mindy Gentry, Concord Planning Manager





Jesse Arreguin, President  
MTC/ABAG Executive Board  
375 Beale Street, Suite 800  
San Francisco, CA 94105-2066

RE: Housing Methodology Committee recommendation – comments and concerns

Dear President Arreguin:

Today is a monumental day for the entire Bay Area as the MTC/ABAG Executive Board considers and votes to recommend that the State Department of Housing and Community Development (HCD) adopt the Bay Area's 6<sup>th</sup> cycle Regional Housing Needs Allocation (RHNA), allocation methodology. This vote is the culmination of hours of work by staff from the entire Bay Area and we want to express our gratitude to the entire HMC and ABAG/MTC staff and consultants for supporting this comprehensive effort. We recognize their hard work and appreciate the continued and direct assistance to our jurisdictions.

As has been previously stated in multiple comments, the North Bay communities are supportive of the HMC decision to utilize the draft Plan Bay Area (PBA) 2050 Blueprint's projected 2050 household data as the baseline in establishing the 6th cycle RHNA for Bay Area communities, as the Draft Blueprint provides similar guiding principles to those adopted by the HMC. However, this assumes the underlying data and assumptions in the 2050 Blueprint model are accurate and comprehensive. As the North Bay communities have recently been given the opportunity to analyze into the data in a meaningful way, multiple concerning errors have been identified, especially for rural communities such as Cotati unincorporated Sonoma County. These errors have been communicated directly to MTC/ABAG staff however no meaningful responses regarding how the data will be corrected have been provided. As such, if the draft PBA is to form the baseline for the RHNA allocation, the Cotati City Council formally requests that:

- 1) MTC/ABAG create a formalized process allowing direct and meaningful methods to have these identified data errors be communicated and corrected; and
- 2) The finalized data and development assumptions used to predict how land will develop under the PBA 2050 Blueprint, be accurate and account for existing real-world constraints; and
- 3) That the Executive Committee not vote to support a methodology that is based on demonstrably incorrect data without committing to meaningfully address such issues.

As identified in previous comments (attached), significant errors in modeling data appear to be erroneously inflating population growth projections in the North Bay unincorporated counties and some rural cities. It is critical that a process be created to ground-truth this information to ensure proper accounting for our unique community constraints. The impacts of these errors are only compounded by the HMC decision not to formally include natural hazards into the allocation methodology as demonstrated by the tragic and on-going impacts of the Tubbs, Kincade, Shady and Glass fires, which have continued to ravage our communities since 2017.



Ultimately, the goal of the HMC, MTC/ABAG, all Bay Area jurisdictions and the HCD should be to ensure adequate housing is provided to meet the needs of our varied and diverse communities in a manner that meets the statutory objectives of the RHNA. Specifically these objectives are to:

- Increase housing supply & mix of housing types, tenure & affordability in an equitable manner
- Promote infill development & socioeconomic equity, protect environmental & ag resources, & encourage efficient development patterns (the State "planning priorities")
- Promote improved intraregional jobs-housing relationship including jobs housing fit
- Balance disproportionate household income distributions (more high income RHNA to lower income areas and vice-versa)
- Affirmatively furthering fair housing

The Cotati City Council questions how the MTC/ABAG Executive Board and ultimately HCD could support a methodology that does not include a process to address these errors. Comments provided to date have identified that the North Bay data assumptions appear to push sprawl development into agricultural and environmentally sensitive areas; away from city-centered transit, infrastructure and jobs; and are not distributing a mix of housing types in a way that affirmatively furthers fair housing. The Cotati City Council further wishes to express concern over how the impacts of the current data assumptions may affect individual communities ability to achieve a certified Housing Element under the new 6<sup>th</sup> cycle Housing Element legislative requirements.

In summary, while the choice to use PBA 2050 data as the baseline for RHNA allocations is supported as a sound planning policy, the use of this data must include a correct data errors as they are identified and communicated. Without an effective accounting for constraints and allowance for needed corrections, the resulting growth projections will not meet the statutory objectives of RHNA and may counter-productively preclude some jurisdictions from achieving Housing Element certification. Ultimately, this lack of statutory conformance and reduction in housing grant funding will result in less homes being built overall, and for the homes that are built to perpetuate the discriminatory policies that have created the issues we are now trying to solve. Please take these comments under serious consideration in any decisions made to support the HMC RHNA methodology and to finalize the PBA 2050.

Sincerely,



Wendy Skillman  
Mayor  
City of Cotati

Enclosed:

1. September 29, 2020, SCTA Comment Letter
2. October 15, 2020, City of Cotati Draft Blueprint/Urban Sims Data Comments + Corrections Identification Email-Noah Housh, City of Cotati Community Development Director



Sonoma County Transportation Authority  
Regional Climate Protection Authority

September 29, 2020

Jesse Arreguin, President  
MTC/ABAG Executive Board  
375 Beale Street, Suite 800  
San Francisco, CA 94105-2066

RE: Housing Methodology Committee recommendation – comments and concerns

Dear President Arreguin:

First, we want to express our gratitude to the entire HMC and ABAG/MTC staff and consultants for supporting this monumental effort. Further the Planning and Community Development Directors and SCTA staff wish to specifically acknowledge the dedication of Gillian Adams, Dave Vautin, Paul Fassinger, Ada Chan, Aksel Olsen, Eli Kaplan and all of the other individuals whom have worked so diligently to support the HMC. We recognize their hard work and appreciate their continued and direct assistance to our jurisdictions.

At its September 18, 2020 meeting, the HMC voted to utilize the draft Plan Bay Area 2050 Blueprint's projected 2050 household data as the baseline in establishing the 6<sup>th</sup> cycle Regional Housing Need Allocations (RHNA) for Bay Area communities. Because the Draft Plan Bay Area (PBA) Blueprint provides similar guiding principles (<https://www.planbayarea.org/2050-plan/plan-bay-area-2050-blueprint>) as those adopted by the HMC, this seems a strategic and logical approach that would move the Bay Area toward these guiding principles. However, this assumes the underlying data and assumptions in the 2050 Blueprint model are accurate and comprehensive. In practice, North Bay communities are realizing, ***the implications of using a 30-year projection to establish an 8-year RHNA are significant and may have unintended consequences, especially for our rural communities and areas of unincorporated counties.*** Given this, if the draft PBA is to form the baseline for the RHNA allocation, then it is critical that:

- 1) The data input and development assumptions used to predict how land will develop must be accurate and account for existing real-world constraints; and
- 2) The growth assumptions must account for the two very different time frames (8 years vs. 30 years) and appropriately account for (but not over emphasize), the widespread economic crisis caused by the COVID-19 pandemic.

To ensure proper accounting for these issues, the Sonoma County Community Development Directors, Planning Directors and SCTA planners have repeatedly requested the data and the development assumptions that ABAG/MTC is utilizing for its modeling. Unfortunately, we have yet to receive the development assumptions, and only received the GIS (layer) zoning assumptions on Friday, September 25. Despite the delay in providing the requested data, ABAG staff has requested our communities each report back on any errors in this data by Wednesday, September 30, effectively providing our staff less than 3 working days to examine GIS data that



took years to build and to identify its errors. As identified below, a few hours spent examining this data has already revealed significant errors that appear to be erroneously inflating populations and projections in the unincorporated county and in some rural cities. ***Additional time is needed for the comprehensive data and assumptions used in the draft PBA Blueprint to be provided by ABAG/MTC staff, and to be truth-tested to ensure proper accounting for our unique community constraints. This need for additional time is only compounded by the tragic impacts of the Shady and Glass fires currently ravaging our communities.***

#### **Data errors identified by Sonoma County jurisdictions**

Without having the requested GIS layers from PBA available to check for errors, local staff have resorted to using the static .pdf graphic provided to each jurisdiction by ABAG. These .pdf maps are not interactive and do not provide any wayfinding information such as streets and roads to assist with orienting and ensuring accuracy with the review. Nonetheless, North Bay staff toiled to make side-by-side comparisons with our own GIS maps and have identified several significant errors.

Specifically, high-density housing assumptions are made in the PBA 2050 data in the following areas, either erroneously or in violation of RHNA objectives:

- In graveyards
- In floodways
- On rural recreational lands many miles from any services (at least 20 instances in unincorporated county)
- Adjacent to freeways with high pollution emission rates
- In industrially designated areas adjacent to noxious land uses
- In areas identified and certified as Priority Production Areas by ABAG/MTC
- Increased densities adjacent to high wildfire areas

In several unincorporated areas, the shape files for high-density housing do not have any relationship to parcel boundaries, roads or zoning districts; rather they appear to have been included randomly. There are clearly a large number of mapping errors that need to be corrected based on existing and known constraints (such as those listed above). If such significant errors were found in only a few hours and using information provided in a limited format, it calls into question the accuracy of the growth projections of the entire model.

While ABAG staff did contact local jurisdictions to ask them to review their data a year ago, the data was provided only as a spreadsheet with hundreds or thousands of data entries and no mapping or development assumptions being given. As such, this format did not result in a true “project referral” or productive engagement as the results clearly identify. Now that the maps have been included and staff can visually check for errors, the Directors and SCTA staff ***request a review period of three weeks following receipt of the requested data and development assumptions from ABAG staff, to review and identify errors in mapping and development assumptions. Further, this feedback needs to be meaningfully incorporated into the data and modeling projections before the RHNA baseline is set and growth is allocated.***

## Infrastructure Constraints and Sites Requirements

All Sonoma County jurisdictions are concerned about the assumptions made in the draft PBA related to infrastructure. The resulting development assumptions (which we still have not received) made in the 30-year 2050 PBA timeline do not translate well into the 6<sup>th</sup> cycle RHNA planning period of 8 years. The use of PBA 2050 development assumptions and 25-year growth projections, which do not account for the 8-year RHNA timeline, deliver obscenely high numbers to unincorporated and rural communities which currently lack the infrastructure to serve the projected high-density growth. It is important to note that HCD is legislatively prohibited from allowing jurisdictions to “count” sites that will not be available for development within the 8-year housing element period. The end result is that jurisdictions allocated shockingly high numbers of growth without the means to develop the infrastructure needed to support such growth, will never be able to identify adequate sites to meet the statutory sites criteria and thus will not be able to achieve certification of their housing elements. Because grant funding for housing now requires a certified housing element, the use of the PBA assumptions will preclude these jurisdictions from receiving any funding to support housing development. ***The Directors and SCTA staff request that such areas identified for growth in the draft PBA 2050 Blueprint NOT be included in a jurisdiction’s RHNA allocation for the 6<sup>th</sup> cycle unless infrastructure can be provided within the 8-year timeframe of the planning cycle. Setting these jurisdictions up for Housing Element failure is not good planning policy and will not result in housing being built.***

## Environmental Justice, Climate Change and Covid-19 Related Issues

The chosen allocation methodology must meet the six statutory objectives of RHNA, including affirmatively furthering fair housing. This means that the RHNA allocation must take ***meaningful action to overcome patterns of segregation*** and to ***replace segregated living patterns*** with integrated and balanced communities.

Unfortunately, mapping done for the PBA 2020 Blueprint reflects a perpetuation of segregated housing patterns by placing higher-density housing allocations into environmentally inferior areas that are already home to the region’s poorest populations by virtue of having the lowest land costs. This, in turn, causes the RHNA allocation methodology to fail to meet the 5<sup>th</sup> statutory objective of RHNA. ***If the draft PBA 2050 Blueprint is to be used as a baseline for the RHNA allocation, the PBA data and projections must also be corrected to meet the six statutory objectives of RHNA, including to remove assumed high-density housing developments from areas that are environmentally inferior such as in flood zones, in polluted areas, adjacent to freeways, within industrial areas with high emissions and in high wildfire areas.***

Additionally, the specific development assumptions for PBA2050 should be made available for comment by the public, and then discussed by the Regional Planning Committee (RPC), HMC and ABAG Executive Board. For instance, it is our understanding that future sea level rise (e.g. current and future flood plain areas) is included as a development constraint for coastal areas, but neither current nor future FEMA regulatory flood plain areas outside of coastal communities are being included. This is not good planning and is an inconsistent approach to identifying and applying the development constraints of climate change, across all Bay Area communities. This is yet another example of why the underlying data and assumptions must be made available, so that local planners can assist ABAG/MTC staff in identifying and correcting these types of issues using our collective localize

knowledge of the issues we understand as lead agencies. Similarly, the additional adjustments to the development constraints and assumptions resulting from the Covid-19 pandemic (such as telecommuting assumptions) should also be provided to the public for discussion by the RPC, HMC and ABAG Executive Board.

In summary, while the choice to use PBA 2050 data as the baseline for RHNA allocations makes sense and can achieve good planning policy (such as thoughtful planning for development in high hazard areas), the use of this data must include means to separate the 8-year RHNA cycle from the 25-year growth model horizons. Without an effective accounting for constraints and allowance for needed corrections, the resulting growth projections will not meet the statutory objectives of RHNA and will counter-productively preclude jurisdictions from achieving Housing Element certification. Ultimately, this lack of statutory conformance and reduction in housing grant funding will result in less homes being built overall, and for the homes that are built perpetuating the discriminatory policies that have created the issues we are now trying to solve. Please take these comments under serious consideration and utilize the feedback provided to improve the PBA 2050 modeling.

Thank you,

Sonoma County Planning and Community Development Directors



Jeffrey Beiswenger  
Planning Manager, City of Rohnert Park



Clare Hartman  
Deputy Director – Planning, City of Santa Rosa



Heather Hines  
Planning Manager, City of Petaluma



Noah Housh  
Director of Community Development, City of Cotati



Jessica Jones  
Community Development Director, Town of Windsor

Janet Spilman

Janet Spilman (Oct 5, 2020 14:55 PDT)

Janet Spilman

Director of Planning, Sonoma County Transportation Authority

David Storer, AICP

David Storer, AICP (Sep 30, 2020 11:51 PDT)

David Storer, AICP

Planning and Community Services Director, City of Sonoma

Kari Svanstrom

Kari Svanstrom (Sep 30, 2020 08:39 PDT)

Kari Svanstrom

Planning Director, City of Sebastopol

Kevin Thompson

Kevin Thompson (Sep 30, 2020 15:00 PDT)

Kevin Thompson

Assistant City Manager/Community Development Director, City of Cloverdale

Tennis Wick

Tennis Wick

Director, Permit Sonoma, County of Sonoma

David Woltering, AICP

David Woltering, AICP (Oct 2, 2020 03:28 PDT)

David Woltering, AICP

Interim Community Development Director, City of Healdsburg

cc: Therese McMillan, MTC Executive Director  
Matt Maloney, MTC Director of Regional Planning  
Suzanne Smith, SCTA Executive Director

**From:** [Noah Housh](#)  
**To:** [jcroff@bayareametro.gov](mailto:jcroff@bayareametro.gov)  
**Cc:** [Ada Chan](#); [Jane Riley](#); [Janet Spilman](#); "[Hines, Heather](#)"; [Christopher Barney](#)  
**Subject:** City of Cotati Draft Blueprint/Urban Sims Data Comments + Corrections  
**Date:** Thursday, October 15, 2020 5:46:00 PM

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Hi Joshua,

Following up on the recent discussions ABAG/MTC staff have been having with some of the Sonoma County communities regarding the data inputs to the Urban Sims model and resulting Draft Blueprint 2050, please see the following list of comments and corrections for the City of Cotati data.

1. The spreadsheet data is generally accurate except that our Commercial Industrial Zoning District is identified as appropriate for residential development at 15 d/u per acre. This is inaccurate-this category is essentially a light industrial zoning district and is not appropriate for any residential development. Therefore all of these properties should be removed from the areas available for residential development in the dataset and model and identified as "No Residential Uses Allowed". This specific parcel data is identified as: name\_pba40 902 Commercial Industrial
2. See below for a few specific parcels identified as pink on the PBA50 map but I cannot understand why they are identified for high density residential development. Generally, in these cases they are a single parcel or small groups of parcels in Rural Residential areas, Industrial or Commercial districts that are not significantly different than the surrounding properties, but have been highlighted as appropriate for high density development where the surrounding properties have not.
  - A. APN 046-111-018 is the City's Corporation Yard, and is also in the Commercial Industrial district (mentioned above) and is not appropriate for residential development at all. Parcel ID 1930272 on the PBA50 Map
  - B. APNs 144-230-021 and 144-230-018 are both Rural Residential properties at the edge of the City and are not appropriate for higher density housing. The spreadsheet includes the accurate d/u per acre allowed in this district as does the parcel data, but they are also highlighted pink on the PBA50 Map as appropriate for higher density development. Parcel IDs 2010557 & 2010554
  - C. Five lots in the Low Density District on the edge of town are also pink on the PBA50 map and would not be good locations for higher density homes. These properties are further complicated by being at the end of a dead-end access road and under significant natural hazard risks (APNs 144-420-026; 144-420-017; 144-420-016; 144-420-011 and 144-420-015) Parcel IDs 2011097; 2011090; 2011089; 2011088; 2011085
  - D. Parcel ID 2010222-Industrial property adjacent to HWY 101
  - E. Parcel ID 2010806-Split zoned parcel developed with a gas station-ok with rear half of property being included in residential calculations/projections as 15 d/u per acre but E. Cotati Avenue portion inappropriate.
  - F. Parcel ID 2011566 and 2011398-both of these parcels are Public Bike Paths
3. See below for several parcels in the un-incorporated County surrounding Cotati that are identified as appropriate sites for high density housing (36 d/u per acre) and should definitely not be in my opinion.



- A. APN 046-181-019 is the location of Carl's Body Shop and junk yard and has been occupied as an industrial use for decades-definitely not a good location for residential uses. Parcel ID 1930599
- B. APN 046-182-010 is a rural residential property on well and septic with Cotati Creek running through it, and appearing to provide on-site wetland habitat. This is similarly not a good location for the high density housing identified.
- C. There are 7 parcels on the west side of the HWY 116/Stony Point Rd intersection identified for development at 36 d/u per acre. This location has no sewer or water services, is adjacent to a creek and has limited access to any services. Parcel ID 1930102 is the central parcel.
- D. Parcel ID 1930144-Issolated agricultural/rural property at the end of a dead end road in Tiger Salamander/Wetland Habitat.

Please let me know when the corrections have been implemented and feel free to follow up with any questions.

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/>







**MAYOR STEVEN SCHARF**  
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CUPERTINO.ORG



November 25, 2020

ABAG Regional Planning Committee Members  
Submitted Via Email To: [info@bayareametro.gov](mailto:info@bayareametro.gov)

**RE: Comments on Recommended RHNA Methodology Released for Public Comment by ABAG**

Dear ABAG Regional Planning Committee Members:

Thank you for the opportunity to provide comments on the recommended Regional Housing Needs Assessment (RHNA) methodology.

The City of Cupertino believes that the recommended RHNA methodology (Option 8A), without modifications, will result in a significant number of jurisdictions appealing both their own and others' draft RHNA allocations. However, if proactive steps are taken now then the number of appeals can be reduced.

The RHNA methodology 8A fails in several significant areas:

1. The methodology does not give sufficient weight to a city's jobs/housing balance. Cupertino's City Council has intentionally not approved large new commercial office projects despite the business tax revenue that such projects provide. As a result, Cupertino has maintained a relatively good jobs to housing ratio. Currently (rounded to the nearest thousand):
  - The City of Cupertino has 41,000 jobs and 22,000 housing units (jobs/housing ratio of 1.86).
  - The City of Santa Clara has 144,000 jobs and 71,000 housing units (jobs/housing ratio of 2.00).
  - The City of Palo Alto has 98,000 jobs and 28,000 housing units (jobs/housing ratio of 3.50).
  - The City of San Francisco has 760,000 jobs and 399,000 housing units (jobs/housing ratio of 1.90)
2. An intentional result of the approach to rein-in large office projects, is that Cupertino has maintained an excellent jobs to housing ratio, the second best of any jobs-rich city in Santa Clara County. The strategy of not approving new commercial office space was specifically to avoid receiving large RHNA requirements in future RHNA cycles. However, Cupertino has been assigned an extremely high RHNA for the 2023-2031 cycle, more than 5x the number received in the 2015-2023 cycle. If property owners actually built that many housing units, it would result in much more traffic congestion and

Greenhouse Gas Emissions (GHG) as new residents commute from Cupertino to jobs-rich areas with large amounts of commercial office growth.

3. The methodology does not consider past and future job growth. It is vital to consider a City's projected housing deficits that will result from large commercial office projects that have already been approved. For example, the Related project in Santa Clara has a housing deficit of 14,600 units, the Central SOMA project in San Francisco has a housing deficit of 5,300 units, and the Google project in San Jose has a housing deficit of 15,000 units (using a very conservative 250 square feet per office worker). These huge housing deficits are not sustainable and will result in increased traffic congestion and GHG emissions as workers commute from housing-rich cities. Cupertino's Vallco SB-35 project has a housing deficit of over 3,100 units but that project was ministerially approved and the City Council would never have approved a project with such a large housing deficit because it would result in future, larger, RHNA requirements.

By contrast, the Apple Park project in Cupertino had an increase of only about 2,000 jobs (versus the previous Hewlett-Packard campus on the same site) and Cupertino constructed sufficient new housing to accommodate that increase. Punishing cities that have behaved responsibly when it comes to balancing jobs and housing is not only unfair, it worsens GHG emissions as new residents must drive to work in other cities.

Cupertino believes that cities that have approved disproportionately high amounts of new commercial office construction, without commensurate amounts of new housing, need to be assigned higher RHNA numbers until their jobs to housing ratio improves to a sustainable level.

4. The methodology inadequately considers the availability, or lack of availability, of mass transit. Cupertino is not served by Caltrain, ACE, BART, or VTA light rail. Cupertino, while traversed by two major freeways: SR-85 and I-280, has no freeway Express Lanes. Furthermore, VTA has continued to reduce bus service to Cupertino and other West Santa Clara County Cities, by both eliminating existing bus routes and shortening other routes. VTA is also planning significant further reductions in service to address financial issues. In short, Cupertino has no high-quality transit service and further cuts in the existing low-quality transit are expected.
5. The methodology does not sufficiently consider the availability of land for new housing which has the net effect of reducing the potential jobs growth for the city, and future housing need. Cupertino is completely built-out, all sites zoned for office development have been developed and the General Plan has minimal potential for job growth. Sites which are currently commercial and industrial will likely need to be rezoned for residences which will drastically reduce their job potential. While it is possible that some commercial office building owners could replace their buildings with high-density housing, the glut of market-rate housing in Silicon Valley (even pre-Covid), falling rental rates, the lack of State or Federal funding for subsidized BMR (Below Market Rate) housing, and the lack of interest of private developers in constructing high-density housing (both BMR and market-rate) combine to make this methodology likely to fail to achieve its goal of creating additional affordable housing.
6. The methodology does not consider the long-term changes in housing, work, and transportation that were occurring even pre-pandemic. Experts agree that the exodus

from high-density, high-cost areas, that lack the type of housing desired by Bay Area residents, will continue long after the current pandemic is over; this will be aided by the ability to remote-work, businesses' desire to lower the cost of operations, the housing flexibility created by 2020's Proposition 19, the reduced need for super-commutes, and the much lower-risk of infectious disease transmission in lower-density housing.

7. The methodology does not consider the unwillingness of property owners to build large amounts of high-density housing given the market conditions that are likely to continue for most of the 2023-2031 period, and that existed even pre-Covid.

In the current, 2015-2023 RHNA cycle, Cupertino approved all the projects in its Housing Element, far exceeding our 1,064-unit RHNA requirement. Cupertino currently has 3,457 entitled units, however only a single project has been completed: a 19 unit, 100% affordable, apartment complex of eighteen, 350 square foot, studios plus one manager's apartment. This project cost nearly \$800,000 per unit to construct. The current RHNA affordable unit allocation would require funding for over 2,500 Very Low and Low Income units at a cost approaching \$2 Billion with no identified funding source.

All four of the other Housing Element Sites from our 2015-2023 Housing Element, remain unbuilt despite having approved projects; the property owners have not yet pulled permits or begun construction even though we are five years into the current RHNA Cycle.

Cities have no means to force property owners to construct approved projects. The current glut of unaffordable market-rate housing, the glut of unleased Class A commercial office space, falling rents (both for housing and office space), and the desire of residents for different types of housing than is included in the approved projects will provide, has resulted in property owners not moving forward with construction.

### **RHNA Requirements for Affordable Housing vs. Limits on Cities' Inclusionary Housing Requirements**

Both the current cycle, and future cycle RHNA requirements have created a Catch-22 for many cities. In Cupertino, we require 15% Inclusionary BMR for rental housing and 20% Inclusionary BMR in for-sale housing, yet Cupertino's 2023-2031 affordable requirement is 57% of 6,223 units. What this means is that over 10,000 more market rate units would need to be built in order to reach the 15% or 20% BMR requirements. Property owners already are not constructing their 2015-2023 RHNA Cycle projects, with one allegation being that Cupertino's requirement for Inclusionary BMR housing now makes the approved projects financially infeasible because of the falling rents of the market-rate component of the projects.

Even if SB 35 kicks in, after a city fails to produce the affordable housing specified in its Housing Element, it does not remotely solve the problem. The appeal of SB 35 was that a project could include one-third commercial office space and the revenue from the office space would subsidize the BMR housing. But because the market for Class A commercial office space currently is so poor, property owners can no longer use Class A office space to subsidize large amounts of affordable housing. Our one current SB 35 project, at the former Vallco Shopping Mall, was submitted by the property owner as a threat. They wanted General Plan Amendments so they could gain approval for a more lucrative project than the SB 35 project. If they do build the SB 35 project, it would worsen our City's jobs/housing ratio since the number of jobs generated by the office space would far exceed the number of housing units that are part of the project; this is one

of several fundamental flaws of SB 35, it dramatically worsens the jobs to housing balance because it allows far too much commercial office space.

To build the mandated 57% of our RHNA as affordable housing would require subsidies of approximately \$1.8 billion, using a conservative cost estimate of \$500,000 per unit (a 19-unit, 100% affordable project in Cupertino, completed in 2018 cost approximately \$760,000 per unit). Building very large quantities of subsidized affordable housing in areas with both extremely high construction and land costs is not practical. Even our current, modest 15%-20% requirement is opposed by property owners in one of the most lucrative areas to build in the area.

Cupertino believes that regional tensions in the RHNA process can be relieved by ABAG updating the recommended RHNA methodology. ABAG and MTC staff need to analyze the comments received and prepare adjusted RHNA methodology options for consideration in November and December 2020.

ABAG and MTC staff need to analyze and describe any shift in baseline-related outcomes for the recommended RHNA methodology resulting from incorporation of the Plan Bay Area 2050 Final Blueprint modeling results.

The 2050 Baseline Allocation is inappropriate for an eight-year RHNA Cycle. It is unreasonable to apply long range, aspirational, housing goals to a single eight-year RHNA Cycle. There will be three additional eight-year RHNA Cycles prior to 2050. The 2023-2031 RHNA Cycle needs to set realistic housing goals.

The affordable housing goals, both in the 2023-2031 RHNA Cycle and in Plan Bay Area 2050, rely on funding sources that are not available and that have no likelihood of becoming available. When the State of California eliminated Redevelopment Agencies, the primary source of funding for affordable housing went away. Attempts in 2019 and 2020 to pass legislation that would restore some funding for affordable housing have either been vetoed by the Governor, or never even made it the Governor's desk.

Furthermore, the required funding for the necessary infrastructure required by large amounts of new housing has never been considered. Water, sewage, roads, mass transit, parks, libraries, public schools, and public safety services all require infrastructure funding that is ignored by the RNHD and the RHNA methodology. Mitigation fees that are charged by cities are far too low to fund the necessary new infrastructure, yet cities are unable to raise these fees to adequate levels even when a Nexus study clearly justifies higher fees.

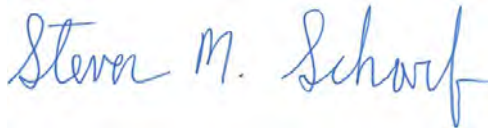
The proper method to determine RHNA allocations is to use the existing 2019 Households baseline as a starting point, consider a City's plans for increased commercial office space and new jobs (using a 250 square feet per job formula), as well as considering the availability of land for new housing development. Especially important is to increase the allocations to a) Cities which have poor jobs to housing ratios, b) cities with sufficient land for the type of housing desired by Bay Area residents, and c) cities with current or planned high-quality mass transit.

Cupertino supports the application of a reasonable cap to limit how much housing a community is expected to build over the RHNA cycle. Housing units that exceed the cap should then be redistributed to other jurisdictions. This addresses development feasibility, especially under current recessionary and Covid-19 conditions that will affect the remainder of the current RHNA Cycle as well as the 2023-31 RHNA cycle.

Cupertino appreciates that ABAG is required to respond to the RHND as assigned. However, the City would like ABAG to send a request for a response to the assertions in the Embarcadero Institute report and the Freddie Mac report alongside any officially submitted proposed RHNA methodology.

Finally, the unworkable RHNA numbers are a direct result of errors by HCD in determining the RHND for each region. Two different organizations have pointed out the errors by HCD. The Embarcadero Institute is a non-profit organization in the Bay Area that publishes analysis on local policy matters. A recent Embarcadero Institute report asserts methodological difficulties with the Regional Housing Needs Determination (RHND) released by the Department of Housing and Community Development (HCD) on June 9, 2020. Freddie Mac has also pointed out that the need for additional housing units is far lower than what HCD has claimed.

Thank you for your continued consideration.



Steven Scharf, Mayor

cc: City of Cupertino Councilmembers  
Deborah L. Feng, City Manager, City of Cupertino  
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)



*"Small Town Atmosphere,  
Outstanding Quality of Life"*

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November 27, 2020

Public Information Office  
ASSOCIATION OF BAY AREA GOVERNMENTS  
METROPOLITAN TRANSPORTATION COMMISSION  
375 Beale Street Suite 800  
San Francisco, CA 94105

**Subject: Methodology for Distribution of RHNA**

Dear ABAG & MTC colleagues:

Once again, the Town of Danville wishes to express our appreciation for ABAG's work on the 6<sup>th</sup> Cycle RHNA process. The Town recognizes that it is not an easy task to develop a methodology that appropriately and fairly distributes the 441,176-unit RHND to the 101 cities and nine Bay Area counties.

On October 15, 2020, the ABAG Executive Board voted to support the Housing Methodology Committee's recommended methodology "Option 8A" and to forward it for public review in advance of submittal to the State Department of Housing and Community Development. The methodology utilizes the "Plan Bay Area 2050 *Future Households*" Baseline and applies a series of *Factors* that adjust the Baseline allocation, in a manner which prioritizes a social equity focus ("Access to High Opportunity Areas") at the expense of region efforts to reach a jobs/housing balance and a greenhouse gas emissions (GHG) reduction targets.

Prior to the October public hearing, the Contra Costa Mayors Conference, Alameda County Mayors Conference and cities in the Bay Area submitted letters expressing significant concerns with the proposed methodology. This letter highlights five concerns that have been identified, which is that the proposed methodology is:

1. Inconsistent with Plan Bay Area 2050 Draft Blueprint.
2. Promotes suburban sprawl and furthers a pattern of jobs-housing imbalance.
3. Inconsistent with other State mandates including the requirement to reduce Vehicle Miles Traveled (VMT) and greenhouse gas (GHG) emissions.
4. Directs growth to areas with limited land capacity, restricted open space and natural hazards.
5. Works *against* equity and fair housing goals.

This letter also suggests an alternate methodology which would more equitably distribute RHNA and in a manner that is more consistent other State mandates.

**1. Insufficient evidence to demonstrate consistency with Plan Bay Area 2050 Draft Blueprint, the Bay Area's long-range transportation, housing, economic and environmental plan.**

SB 375 requires that the RHNA is consistent with the Sustainable Communities Strategy. In other words, consistency between the 2023-2031 RHNA and the Plan Bay Area 2050 Draft Blueprint (PBA 2050) is statutorily required. Page 13 of ABAG's RHNA methodology report concludes that the two documents are consistent since the 8-year RHNAs do not exceed the 35-year (2015-2050) growth forecasts for sub-regions in the Bay Area.

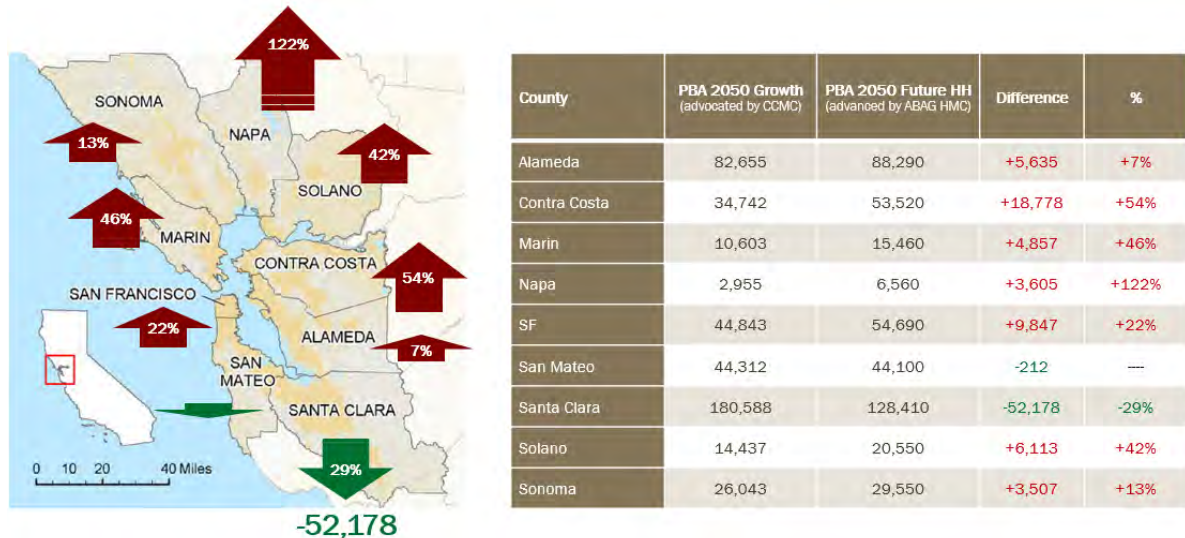
This conclusion is flawed on several levels. First, the 35-year forecast period is more than four times the length of the 8-year RHNA time horizon. It is unreasonable to conclude that a RHNA can be deemed consistent with the SCS if it presumes a sub-regional growth rate that is four times higher than the forecast for that area. It is also unreasonable to presume that a community can condense and assimilate housing growth that is projected over a 35-year period into a much shorter period of time.

Second, and more importantly, there is no way to evaluate consistency without jurisdiction-level forecasts. Consistency at a sub-regional level is meaningless, as sub-regions do not have the authority to write, adopt, or implement Housing Elements. This responsibility rests with cities and counties alone. Sub-regions contain jurisdictions with vastly different populations, employment bases, geographies, hazard levels, and physical constraints. Lumping dissimilar cities together as sub-regions in PBA 2050, and then assigning growth at the city-level through the RHNA process, makes it impossible to determine consistency between the two processes.

We urge ABAG to publish jurisdiction-level forecasts for PBA 2050 so that consistency can be accurately and transparently determined. If the 2040 forecasts are used as a proxy, the RHNA appears grossly inconsistent with the forecasts for many jurisdictions, including our own.

2. The Plan Bay Area 2050 *Future Households* Baseline promotes suburban sprawl by allocating a disproportionate number of housing units to the region's urban fringes away from the major job centers, furthering the historic pattern of jobs-housing imbalance.

Figure A. Impact of switching to the 2050 Future Households Baseline from the 2050 Growth Baseline.



Furthermore, this baseline **reduces** housing assignment in the western and southern subregions of the Bay Area that has historically under-produced housing, at the expense of subregions that have historically been the region's housing supplier. Under the Draft RHNA, the housing allocation to Santa Clara County fails to match the explosive jobs growth in that County over the past decade. This under allocation of new housing to Santa Clara County results in significantly higher allocations to other counties and fails to adequately address the significant jobs-housing imbalance in Santa Clara County.

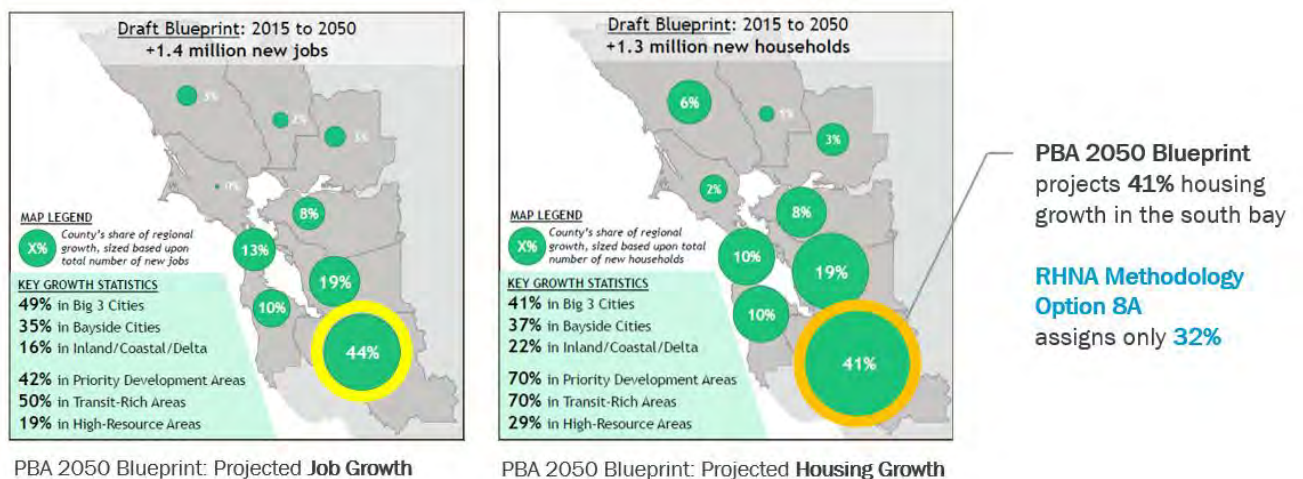


Figure B. Job Growth in the Bay Area between 2010 to 2016, as documented by ABAG.



This conflicts with Plan Bay Area 2050 (PBA 2050), which anticipates a 42% increase in housing growth in Santa Clara while the methodology assigns only 32% of the RHND there. This amounts to over 40,000 units allocated elsewhere in the region – most problematically, to outer suburbs, small cities, and rural and unincorporated county areas.

Figure C. Job Growth in the Bay Area between 2010 to 2016, as documented by ABAG



3. **The proposed RHNA methodology is inconsistent with State mandates to reduce Vehicle Miles Traveled (VMT) and greenhouse gas (GHG) emissions, improve air and water quality, preserve agricultural land, and focus development away from areas with high wildfire risks.**

As result of the lack of jobs-housing balance, the Draft RHNA will work against key regional planning goals and State mandates including those to address VMT and GHG emissions by perpetuating sprawl and inefficient growth patterns.

The housing distribution under the Draft RHNA conflicts with the requirements of SB 743, which requires use of the VMT standard when evaluating potential environmental impacts of a proposed development under CEQA. The Legislative Intent of SB 743 is to: encourage infill development; improve public health through active transportation; and reduce GHG emissions. Placing the housing in the urban fringes of the Bay Area, away from job centers and transportation hubs, will increase, not reduce, VMT. As a result, review of proposed housing developments under CEQA will not meet established VMT Thresholds of Significance and will result in potentially significant environmental impacts that cannot be easily mitigated.

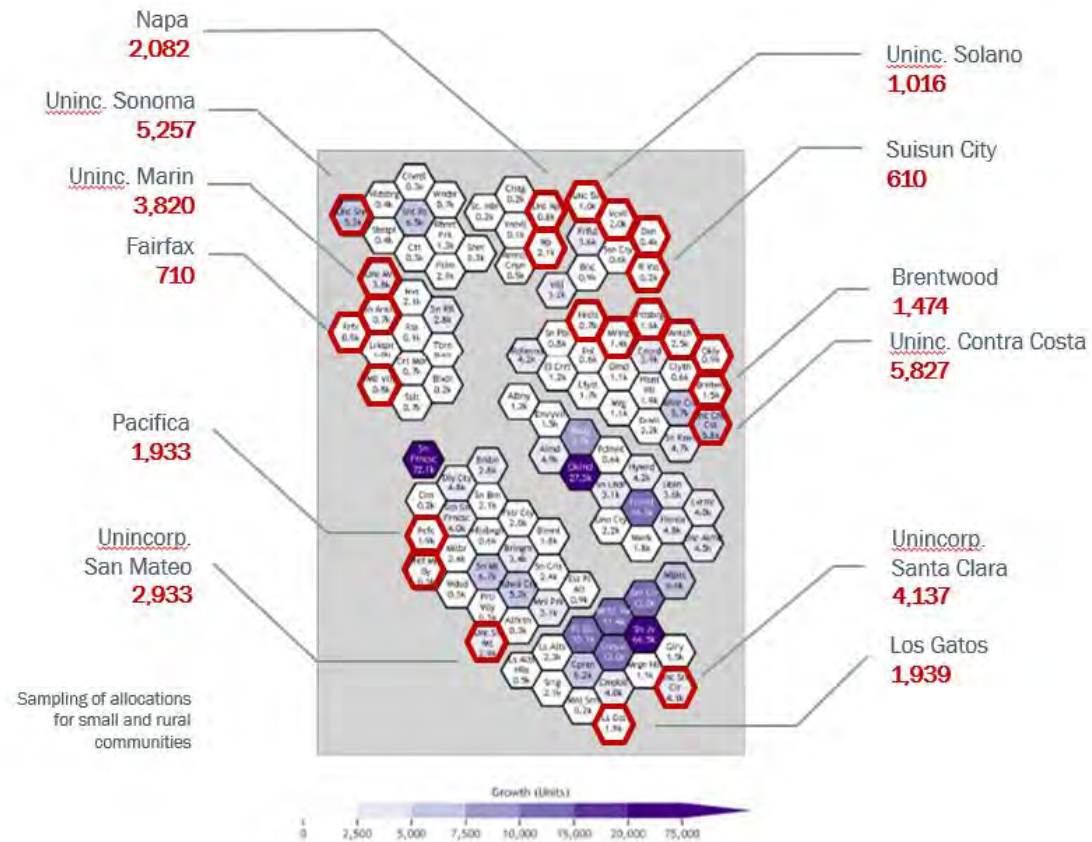
The Draft RHNA also conflicts with the GHG reduction requirements under AB 32, SB 32, and AB 197. These laws require that the State limit GHG emissions so that emission levels in 2030 do not exceed 1990 levels. Based on Plan Bay Area's housing and job projections, and emphasis on housing-jobs balance and transit-oriented housing, the plan would still fall short of GHG emission reduction goals. The Draft RHNA's departure from prioritizing housing-jobs balance and transit-oriented housing will lead the region and the State further from achieving these GHG emission requirements.

This impact is amplified for the Town of Danville as the community is not projected to add a significant number of new jobs over the next 35 years and Danville has limited bus service and limited access to mass transit options.

4. **The proposed RHNA methodology directs growth to cities and unincorporated county areas with limited to no develop-able land, restricted open space areas, land outside of voter-approved urban growth boundaries, areas that lack mass transit, and natural hazard constraints.**

| Sampling of Impacted Jurisdictions | PBA 2050 <i>Growth</i> Methodology (Proposed Altern) | PBA 2050 <i>Future Households</i> (HMC Option 8A) | Difference | % Change |
|------------------------------------|--|---|------------|----------|
| Santa Clara County                 |  |   |            |          |
| Los Gatos                          | 142  | 1,430   | +1,288     | +907%    |

|                     |         |        |         |         |
|---------------------|---------|--------|---------|---------|
| Monte Sereno        | 3       | 140    | +137    | +4,567% |
| Mountain View       | 12,377  | 7,810  | -4,567  | -37%    |
| Palo Alto           | 11,127  | 6,810  | -4,317  | -39%    |
| San Jose            | 100,155 | 67,240 | -32,915 | -33%    |
| Santa Clara         | 14,285  | 9,630  | -4,655  | -33%    |
| Sunnyvale           | 12,025  | 9,980  | -2,045  | -17%    |
| Alameda County      |         |        |         |         |
| Albany              | 355     | 930    | +575    | +162%   |
| Piedmont            | 60      | 430    | +370    | +617%   |
| Unincorporated      | 1,638   | 5,950  | +4,312  | +263%   |
| Contra Costa County |         |        |         |         |
| Danville            | 223     | 1,820  | +1,597  | +716%   |
| Hercules            | 411     | 1,060  | +649    | +158%   |
| Martinez            | 311     | 1,670  | +1,359  | +437%   |
| Unincorporated      | 2,588   | 7,310  | +4,722  | +182%   |
| Marin County        |         |        |         |         |
| Fairfax             | 215     | 460    | +245    | +114%   |
| Mill Valley         | 27      | 710    | +683    | +2530%  |
| San Anselmo         | 202     | 670    | +468    | +232%   |
| San Mateo County    |         |        |         |         |
| Atherton            | 30      | 280    | +250    | +833%   |
| Hillsborough        | 116     | 470    | +354    | +305%   |
| Pacifica            | 199     | 1,580  | +1,381  | +694%   |
| Portola Valley      | 3       | 200    | +197    | +6,567% |
| Solano County       |         |        |         |         |
| Benicia             | 258     | 1,270  | +1,012  | +392%   |
| Dixon               | 209     | 690    | +481    | +230%   |
| Rio Vista           | 84      | 420    | +336    | +400%   |
| Suisun City         | 298     | 1,070  | +772    | +259%   |
| Vacaville           | 1,056   | 3,650  | +2,594  | +246%   |
| Vallejo             | 2,117   | 5,250  | +3,133  | +148%   |
| Sonoma County       |         |        |         |         |
| Sonoma              | 184     | 620    | +436    | +237%   |
| Unincorporated      | 6,893   | 9,080  | +2,187  | +32%    |



5. While the Draft RHNA provides an emphasis on equity and fair housing which is vitally important, we believe the unintended consequences of the growth patterns dictated by Option 8A may actually work against equity goals by:
- Requiring *people who are unable to work from home* to travel long distances from where they live to where they work.
  - *Increasing auto reliance* those residents who are unable to work from home for daily commutes by underemphasizing transit access – at a *significant economic, social and environmental cost* to those residents.
  - *Disincentivizing urban re-investment* on in-fill lots and brownfields by prioritizing housing growth away from cities that want and need new housing to serve their communities and support their local economies.
  - Allocating a disproportionate number of housing units to communities that are largely built out, with little undeveloped or under-developed lands, would result in the need to re-designate lands for housing which already contain either viable housing and/or high assessed-value developments.

In terms of economics, this makes these lands un-likely to redevelop regardless of the change in land use designation, especially when multiple properties would need to be aggregated to create a viable site. Furthermore, assigning units to physically constrained communities in some instances would require the removal of existing affordable units (due to their age and/or other characteristics) in order to accommodate a high housing assignment. In either scenario, these lands would carry a high land cost and any resulting re-development would result in housing units that would be far from affordable without significant subsidies.

Adopting a RHNA that more equitably assigns units to under-developed urban areas would result in timely re-development addressing the States critical housing shortage.

### Recommended Alternative Baseline and Factors

As previously requested, and similar to the approach advocated by Contra Costa Mayors Conference and others at the Executive Board’s October public hearing, we would urge the Executive Board to consider an Alternative to Option 8A, that uses the “Plan Bay Area 2050 *Growth*” Baseline. We would also seek further refinements to the Factors as follows:

|   | HMC Option 8A   | Proposed Alternative Methodology   |
|---|---|--|
| <b>Baseline</b>                                 | <b>Plan Bay Area 2050 Households</b>  | <b>Plan Bay Area 2050 Growth</b>   |
| <b>Factors and Weighting</b>                    |   |  |
| <b>Very-Low and Low Income Units</b>            |   | <ul style="list-style-type: none"> <li>• 60 % Access to High Opportunity Areas</li> <li>• 20 % Jobs Proximity - Auto</li> <li>• 20 % Jobs Proximity - Transit</li> </ul> |
| <b>Moderate and Above Moderate Income Units</b> | <ul style="list-style-type: none"> <li>• 40 % Access to High Opportunity Areas</li> <li>• 60 % Jobs Proximity Auto</li> </ul> | <ul style="list-style-type: none"> <li>• 20 % Access to High Opportunity Areas</li> <li>• 40 % Jobs Proximity - Auto</li> <li>• 40 % Jobs Proximity - Transit</li> </ul> |

Together, these changes would have the following beneficial outcomes for the region, each of which would improve its consistency with Plan Bay Area:

- **Increased share of RHNA to the “Big Three” cities and inner Bay Area**, and a corresponding decrease in that assigned to the outer Bay Area, unincorporated, and small and rural communities by approximately 30,000 units. This will ensure

that that the largest share of housing growth is allocated to the region's biggest job centers, in areas well-served by transit and infrastructure.

- **Reduced allocation to unincorporated county areas by over 10,500 units** – avoiding further residential growth pressures in areas most subject to natural hazards, lack of infrastructure capacity, and threatened loss of agricultural and open space land.
- **Alignment of the share of housing growth in Santa Clara County to match Plan Bay Area 2050 and the County's significant jobs growth of the past decade.** Santa Clara, home of some of the region's largest tech firms, has the largest numeric deficit in housing production to jobs production over the past decade, which could be corrected in part by this adjustment.

Please do not hesitate to contact me if you have questions or would like to discuss this letter further.

Sincerely,  
TOWN OF DANVILLE

A handwritten signature in black ink that reads "Karen G. Stepper". The signature is written in a cursive, flowing style.

Karen G. Stepper, Mayor

C: Danville Town Council





November 17, 2020

Mayor Jesse Arreguín, President  
Association of Bay Area Governments, Executive Board  
375 Beale Street, Suite 800  
San Francisco, CA 94105-2066  
Email: [RHNA@bayareametro.gov](mailto:RHNA@bayareametro.gov)

**RE: Proposed RHNA Methodology**

Dear Board President Arreguín,

The City of Dublin (City) wishes to express concerns regarding the proposed Regional Housing Needs Allocation (RHNA) methodology that the Association of Bay Area Governments (ABAG) Executive Board is scheduled to take final action on at its January 21, 2021 meeting.

The City appreciates the urgency of the statewide housing crisis and the responsibility of local jurisdictions to facilitate housing construction to help alleviate this crisis. Dublin was the fastest growing city in California between 2010 and 2019 due to significant steps taken to facilitate the construction of both market-rate and affordable housing. During the current RHNA cycle, the City issued building permits for the construction of 4,138 dwelling units compared to our allocation of 2,285 units. Specifically, as of September 30, 2020, the City had issued permits for 3,993 above-moderate income, 80 moderate income, 39 low-income, and 26 very low-income units.

In the near future, the City anticipates construction of additional new affordable housing utilizing the City's Affordable Housing Fund and Alameda County Measure A-1 Bond funding. In July 2020, the City issued a Notice of Funding Availability for approximately \$10 million in funding to support predevelopment, acquisition, and construction of affordable rental housing and is currently reviewing proposals.

The 6<sup>th</sup> Cycle RHNA process presents significant challenges and the City appreciates the efforts and dedication of the Housing Methodology Committee. However, the City urges the Executive Board to reject their proposed methodology and consider alternative factors and weights, in order to more appropriately balance the RHNA statutory requirements including equity and fair housing goals, as well as those related to efficient growth patterns and greenhouse gas emissions.

The City is concerned with the disproportionate emphasis on factors that allocate RHNA to high opportunity areas, without consideration of the negative consequences of the resultant land use patterns. The following points reflect our specific concerns with the proposed methodology:

- Does not adequately address factors related to jobs proximity and locates housing a considerable distance from the Bay Area's major employment centers of the South Bay, Oakland, and San Francisco.

**City Council**  
925.833.6650  
**City Manager**  
925.833.6650  
**Community Development**  
925.833.6610  
**Economic Development**  
925.833.6650  
**Finance/IT**  
925.833.6640  
**Fire Prevention**  
925.833.6606  
**Human Resources**  
925.833.6605  
**Parks & Community Services**  
925.833.6645  
**Police**  
925.833.6670  
**Public Works**  
925.833.6630

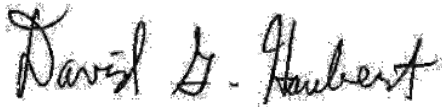
100 Civic Plaza  
Dublin, CA 94568  
P 925.833.6650  
F 925.833.6651  
[www.dublin.ca.gov](http://www.dublin.ca.gov)

- Allocates growth in a manner that promotes auto dependency, prolongs longer commutes, and exacerbates associated GHG emissions. In addition to the environmental factors, it impacts time away from families and economic strain on household finances, particularly for lower-income households.
- Pushes significant housing allocations to the outer ring of Bay Area suburbs, exasperating the jobs/housing imbalance.
- Fails to consider progress made during current RHNA cycle, as outlined above.

Given these concerns, the City urges the Executive Board to reject the proposed methodology recommended by the Housing Methodology Committee and refine the methodology to consider factors and weights that focus housing in areas most proximate to highest concentration of jobs as well as recent housing production efforts.

Should you have any questions, please do not hesitate to contact Michael Cass, Principal Planner, at (925) 833-6610 or [Michael.Cass@dublin.ca.gov](mailto:Michael.Cass@dublin.ca.gov).

Sincerely,

A handwritten signature in black ink that reads "David G. Haubert". The signature is written in a cursive, slightly slanted style.

David Haubert, Mayor  
City of Dublin

cc. Linda Smith, City Manager  
Jeff Baker, Community Development Director  
Kristie Wheeler, Assistant Community Development Director  
Michael P. Cass, Principal Planner





## **TOWN OF FAIRFAX**

142 Bolinas Road, Fairfax, California 94930

(415) 453-1584 / Fax (415) 453-1618

October 13, 2020

Mayor Jesse Arreguin, President  
Association of Bay Area Governments, Executive Board  
375 Beale Street, Suite 700  
San Francisco, CA 94105-2066

Dear Board President Arreguin:

On behalf of the Town Council of Fairfax, please accept our comments related to the proposed Regional Housing Needs Allocation (RHNA) methodology recommended by the RHNA Housing Methodology Committee (HMC). Please consider these comments in advance of the October 15, 2020 ABAG Executive Board meeting where the recommended methodology will be discussed.

The Town of Fairfax is aware and appreciative of the efforts and dedication of the HMC stakeholder group over the last year in attempting to recommend an appropriate distribution of 441,000 new housing units assigned to the region by the State Department of Housing and Community Development (HCD). Our Town understands both the challenges and urgent need to address State and regional policy goals pertaining to housing affordability, climate change and equity in the upcoming 6<sup>th</sup> Regional Housing Needs Assessment (RHNA) cycle.

Unfortunately, however, there are a number of problems with the methodology recommended by the HMC for allocating new housing units to Fairfax. Our Town lacks adequate transportation infrastructure and public transportation services. Marin is projected to naturally decrease in population in the next decade as its residents continue to age. The County as a whole, and Fairfax in particular being located at the far end of Marin's urbanized area, is removed from existing and future job centers.

Fairfax is in an area of high fire risk. Even compared to nearby jurisdictions, the Town's location at the far end of Marin's urbanized area and street network means that evacuation is particularly problematic in the event of a wildland fire, such as those the State continues to experience. Based on our extreme fire danger, the Town respectfully requests that ABAG add to the 2050 Plan Bay Area Blueprint Wildland-Urban Interface Fire Threat areas for the San Francisco Bay Region, which is available in the Metropolitan Transportation Commission Map Gallery. Currently, only CAL FIRE Very High Severity zones are factored into the Plan, which do not adequately represent wildfire risk in the Bay Area.

Furthermore, Marin Municipal Water District's Water Resources Plan for the Marin jurisdictions it serves (including Fairfax) states that there is an insufficient water supply in the event of an extended drought. Finally, there is virtually no vacant land in Fairfax available for large-scale development.

Despite these inherent limiting factors, the recommended methodology and preliminary housing numbers shown for Fairfax would be over 800 percent higher than the current RHNA allocation, and equivalent to the prior five decades' worth of housing development.

The recommended methodology and resulting RHNA numbers do not set realistic quotas for housing growth locally and regionally, and will not only fail to meet the Bay Area's total regional housing need, but will threaten our region's ability to grow sustainably into the future.

Other similarly situated cities in Marin are expected via the methodology to grow at similarly high rates, despite Plan Bay Area 2050 projections to the contrary. The result is to push a greater proportion of new development into areas that will further increase auto dependency and longer commute times, exacerbate GHG impacts, and run counter to the goals and objectives that were well-formulated and strongly articulated in the recently released Plan Bay Area Blueprint.

To avoid these outcomes, we recommend consideration of one or both of the following changes to the recommended methodology:

- 1) Utilize Plan Bay Area 2050 *Household Growth* as the baseline for the RHNA allocation rather than Plan Bay Area HH in 2050.

Utilizing the Plan Bay Area 2050 *Household Growth* as the baseline will align RHNA more closely with Plan Bay Area Blueprint objectives and focus a greater proportion of growth to areas where transportation investments, job growth, and beneficial market conditions are expected to be focused. Other Marin jurisdictions will be advocating for this methodology.

- 2) Reduce the 40% allocation factor to High Resource Areas for moderate and market rate units utilized in Recommended Option 8A

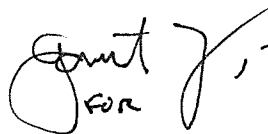
While not clear from the presentation materials provided to the HMC, it appears that the 70% allocation factor for very low and low-income units, and the 40% allocation factor for moderate and market rate units, are driving significant additional units to High Resource Areas, such as Fairfax, beyond that anticipated in Plan Bay Area 2050. It is not clear how the 40% allocation factor for moderate and market rate units helps further the equity purpose the HMC intends, as it would appear to drive relatively more higher income households to High Resource Areas. Reducing or eliminating this allocation factor would presumably reduce the overall housing allocation to jurisdictions like Fairfax without affecting the strategy the HMC proposes to introduce greater equity into the RHNA process.

While we again recognize the challenge that the HMC faced in developing an appropriate allocation methodology, and appreciate many of the thoughtful contributions they have introduced into the process, we believe the outcomes of the recommended methodology, unless modified, would be inconsistent with Plan Bay Area 2050 objectives to grow the Bay Area sustainably and allocate scarce resources efficiently.

Fairfax is one of the few Bay Area jurisdictions that has met its total number of new residential units in the current 5<sup>th</sup> RHNA housing cycle, including exceeding its low income housing allocation. We understand and have delivered our fair share of housing. Fairfax believes it can continue to thoughtfully craft housing policies and support housing that both helps to address the region's housing supply, affordability, and equity issues, and meets the needs of our Town. However, without modification the recommended HMC methodology presents wholly unrealistic housing quotas in the 2023-2031 RHNA cycle which sets our Town up for failure and punitive state-imposed land use controls and penalties.

With appreciation for your Bay Area regional work, we thank you for your time and consideration.

Sincerely,

 , TOWN MANAGER  
for

Fairfax Mayor Renee Goddard



## OFFICE OF THE CITY COUNCIL

*City of Foster City*

November 20, 2020

Ms. Karen Mitchoff, Chair  
ABAG Regional Planning Committee  
c/o ABAG-MTC Public Information Office  
375 Beale St, Suite 800  
San Francisco, CA 94105

VIA EMAIL: [RHNA@bayareametro.gov](mailto:RHNA@bayareametro.gov)

### **RE: Proposed RHNA Methodology and Subregional Shares**

Dear Chair Mitchoff:

The City of Foster City would like to thank you for the opportunity to comment on the proposed Regional Housing Needs Assessment (RHNA) methodology **Option 8A: High Opportunity Areas Emphasis & Job Proximity** for the RHNA 6 Cycle (2023-2031) and the draft subregion shares passed by the ABAG Executive Board at their October 15, 2020 meeting.

HCD has determined that the Bay Area must plan for **441,176 new housing units from 2023 to 2031**. Option 8A uses the 2050 Households from the forthcoming Plan Bay Area 2050 Draft Blueprint as the baseline starting point for allocating new housing units amongst the jurisdictions across the region. Option 8A also allocates the region's required new housing units within the very low, low, moderate, and above-moderate income categories using a bottom-up approach. The bottom-up approach adds up the individual income category allocations to create a jurisdiction's total allocation. A jurisdiction's allocation within each income category is based upon how the jurisdiction scores relative to the rest of the region on the following selected factors: Access to High Opportunity Areas (AHOA); Jobs Proximity – Transit; and Jobs Proximity – Auto. The weights assigned to these three factors include: 70% weight given to AHOA and 30% to Jobs Proximity – Auto (15%) and Job Proximity – Transit (15%) for very low and low units and 40% weight given to AHOA and 60% Job Proximity – Auto for moderate and above moderate.<sup>1</sup>

If proposed RHNA Methodology 8a is adopted, the City of Foster City will receive an allocation of **2,028 units** for RHNA 6 – this translates to an increase in **471%** from RHNA 5 which was 430 units. To put this in context – the Bay Area

<sup>1</sup> [https://abag.ca.gov/sites/default/files/rhna\\_methodology\\_report\\_2023-2031\\_finalposting.pdf](https://abag.ca.gov/sites/default/files/rhna_methodology_report_2023-2031_finalposting.pdf)

Region's increase in RHNA 6 is **235%** (441,176 units) and San Mateo County's Increase is **338%** (48,490 units) when compared to RHNA 5.

Earlier this year, ABAG requested the City's input with the RHNA Local Planning Factor Survey. This Survey is required by law for ABAG to allow jurisdictions to identify local planning factors prior to the development of a proposed RHNA methodology, per Government Code Section 65584.04(b). Information collected from the survey is required to be included as part of the proposed RHNA methodology. The City of Foster City submitted its response to the Local Planning Factors Survey. The response indicates the local planning factors that demonstrate limitations in the City's ability to accommodate future housing growth.

The current extraordinarily high draft RHNA 6 allocation based on Option 8A is infeasible for the City of Foster City for many reasons as outlined below:

## **I. Lack of Vacant Land:**

- a. Non-Vacant Residential Land: The City of Foster City is a 4 square-mile city that is largely built out. Currently, there is no vacant residential land that can accommodate additional opportunities for residential development. This is partly because since 2000, approximately 51 acres of land designated for commercial and/or semi-public use was converted to residential or mixed-use residential. All of the existing residentially zoned land consists of currently developed properties. Therefore, future residential development of these existing residential properties would have to be accommodated by infill, reuse, and redevelopment.
- b. Non-Vacant Commercial/Industrial Land: Much of the City's existing commercial and industrial land is built out. One of the factors included within the methodology to determine RHNA allocations is based on projected job growth which depends on preserving and/or expanding existing inventory of commercial or industrial land. The significant size of RHNA allocations will force the City to evaluate and re-designate non-residential land for residential development. This effectively limits the City's ability to create jobs, thus reducing the job growth factor projected in the modeling of the RHNA methodology.

## **2. Compliance with State law:**

Upon review of the Government Code requirements for Housing Elements and the HCD Sites Inventory Guidebook, we find the following factors severely limit the sites that can be considered for future growth:

- a. Realistic Development Capacity: Realistic development capacity calculation accounts for minimum density requirements, land use controls, site improvements, typical densities of existing or approved projects at similar income levels, and access to current or planned, water, sewer, and dry utilities (Government Code Sections 65583.2(c)(1) and (2)).<sup>2</sup> The City of Foster City must demonstrate realistic development capacity for a large percentage of existing viable land with existing stable land uses in the City. This is infeasible as the City would essentially have to consider a large area of existing job-generating uses to transition to residential uses and must prove these sites are viable to transition during the planning period.
- b. HCD's Substantial Evidence Standard: The HCD Sites Inventory Guidebook requires the City to analyze property as either vacant or non-vacant. As noted above, there isn't any vacant land in the City; therefore, the City will need to consider non-vacant land to meet its RHNA. The HCD Guidebook states that when a City plans to accommodate more than 50 percent of the lower-income RHNA on non-vacant land, substantial evidence must be provided proving that the existing uses of the land will be discontinued during the planning period. In the Draft RHNA allocation to the City, ABAG does not appear to have made an effort to take this factor into consideration to determine if there is sufficient non-vacant land in the City

<sup>2</sup> <https://codes.findlaw.com/ca/government-code/gov-sect-65583-2.html>

that can satisfy the substantial evidence standard in order to meet its RHNA. As part of its Housing Element Update, the City will conduct a sites inventory assessment and will list sites that are practicable, but in order to meet its RHNA, the City will need at least 58 – 68 acres of land, assuming a density of 30 or 35 units per acre to meet the projected 2,028 units. That means property owners of at least 58 to 68 acres of commercial/industrial land in the City must conclude that a conversion of some, or all, of their land to a residential use is more advantageous than their existing non-residential use. Before assigning the City its Draft RHNA, ABAG should have included a reasonable level of analysis, or at least made direct inquiries regarding the availability of land upon which the City (and other cities in a similar situation) would be able to plan for its future RHNA.

- c. Penalties for Non-Compliance: If the City cannot facilitate property owners to make their land available for housing through various incentives, as described by State law, the City will have very limited alternatives to meet its projected RHNA. Therefore, inherent consequences of non-compliance will be forced upon the City if it fails to comply with a RHNA, when limited or lack of availability of land do not allow the City to comply. State law and the RHNA allocation methodology should therefore not punish the inability of the City to comply with a mandate due to the lack of land availability.

### 3. RHNA Methodology Option 8A Weighted Factors:

- a. Limited Weight Given to Access to Transit: Option 8A allocates the majority of the units based on the Access to High Opportunity Areas and factors related to Job Proximity (Auto & Transit). However, it places little weight on access to 'High Quality Public Transit.' Plan Bay Area 2050, includes a diverse range of strategies to reduce greenhouse gas emissions, including: Focusing more housing growth in areas near high quality public transit and in high-resource communities near job centers. Contrary to the RHNA and Plan Bay Area 2050 objectives, Option 8A will not further greenhouse gas reduction goals or protect residents from environmental impacts. Option 8A allocates too many housing units to suburban areas that lack adequate high-quality public transit. Targeting growth in areas such as Foster City that have poor-quality public transit, in which bus routes have average service intervals during peak traffic hours that are so long (30-60 minutes) that make public transit unattractive/inconvenient is impractical. Instead, the RHNA Allocation Methodology should target growth in "Transit Rich Areas". Transit Rich Areas should be areas near a "major transit stop", such as a rail transit station or ferry terminal, or a "high-quality transit corridor", which is a fixed bus route service with average service intervals of no longer than 15 minutes during peak commute hours.<sup>3</sup>
- b. Infrastructure Constraints: Option 8A does not take into consideration availability of adequate infrastructure such as water, sewer, streets, school capacity, and other local constraints that a City like Foster City faces or any other 'built-out' city faces to support housing growth. Foster City (through the Estero Municipal Improvement District) purchases all of its water from the San Francisco Public Utility Commission as a contractual member of the Bay Area Water Supply and Conservation Agency. The City's water supply allocation is not sufficient to support 2000 additional housing units. Furthermore, the City is basically an island with only three access points of ingress and egress. Given the increase in regional highway traffic over the last several years, the congestion has backed onto the City's roadways and traffic has been impacted considerably. Adding more housing without taking into consideration, the City's roadway networks, circulation and limited ways to get in and out of the City would only exacerbate the current problem.

<sup>3</sup> Pub. Resources Code, § 21064.3 – ("Major transit stop" means a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.").

OPR Guidelines on using VMT in CEQA: [https://opr.ca.gov/docs/20190122-743\\_Technical\\_Advisory.pdf](https://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf)



- c. City of Foster City's Track Record: The City of Foster has made significant progress in development of housing, particularly affordable housing, including:
- Creating 499 affordable housing units over the current and previous RHNA Cycles
  - Producing more than double the number of units in the current RHNA Cycle albeit we are yet to meet 100% of our RHNA targets in the VL, L and M categories (produced 898 units to date in current RHNA planning period when RHNA 5 was 430 units)
  - Being one of the very few cities that has a 20% inclusionary policy in the Housing Element (20% of any new housing units are required to be affordable)
  - Adopting the Commercial Linkage Fee (a fee per square foot of new commercial development that is paid into the City's Affordable Housing Fund)
  - Streamlined requirements for Accessory Dwelling Units (ADUs)

Furthermore, the City of Foster City has been actively addressing the housing shortage and has been one of the few cities that is in compliance with State laws. Based on the Annual Progress Report that the City submitted to HCD, the State determined that we are one among the 29 cities that have met our prorated (Very-Low and Low) and Above-Moderate Income RHNA and, therefore, are currently not subject to the streamlined ministerial approval process under [SB 35](#). The remaining 510 jurisdictions are subject to SB 35. To be placed in the same bucket as a jurisdiction that has failed to produce housing and not assigning RHNA targets proportionally to cities that have complied versus the ones that have not complied seems not only unreasonable but also places an undue burden on the compliant cities.

Even if the City were to undertake rezoning or introduce new policies to add new housing units, lack of vacant land, lack of housing sites due to the previous conversion of non-residential land to residential uses, lack of access to high quality public transit (bus lines only) and limited infrastructure such as water, sewer and school capacity (one middle school and no high school), all combine to make high RHNA numbers unachievable. Further, as stated above this will be required by a jurisdiction that has consistently strived to meet its RHNA. Given the City's commitment to housing production and providing affordable housing to address the region's housing challenges, the City requests that the final methodology takes into consideration the City's historic track record in achieving its RHNA targets.

- d. Community Character and Quality of Life: In the late 1950s, T. Jack Foster had a vision to transform the 2,600-acre/4-square mile land consisting of a dairy farm and salt ponds into a successful master planned community. Foster's original vision for the master plan was to accommodate a variety of housing types by dividing it into nine neighborhoods, each with access to schools, parks, and neighborhood shopping centers and clearly delineated the commercial and industrial lands from residential. Much of the community character and quality of life in Foster City is based on its unique qualities as a self-contained master planned community and its enviable 16 miles of navigable waterways & lagoons. Since its incorporation in 1971, the City has embraced growth while maintaining much of its character and quality of life. Expecting a built-out community like Foster City to accommodate the extremely high projected number of units for the next 8 years would result in unintended consequences. The final RHNA methodology should take into consideration quality of life factors, sustainability, and impacts on community character.

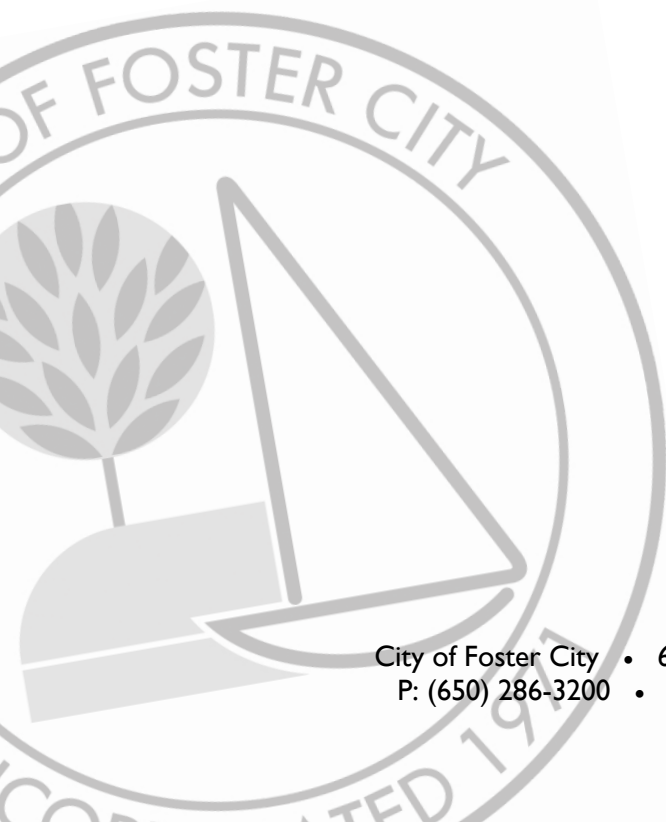
While the City is committed to contributing to the collective local, regional and State needs for housing, the City finds that the Draft RHNA Allocation is unrealistic and excessive and can have unintended consequences to the City and its residents. Therefore, the City, respectfully asks that the Draft RHNA Allocation and RHNA methodology be reconsidered. Thank you for your consideration, and this opportunity to provide comment.

Sincerely,



Catherine Mahanpour, Mayor  
City of Foster City

Cc: Sanjay Gehani, Vice Mayor, City of Foster City  
Richa Awasthi, Councilmember, City of Foster City  
Jon Froomin, Councilmember, City of Foster City  
Sam Hindi, Councilmember, City of Foster City  
Dante Hall, Interim City Manager, City of Foster City  
Marlene Subhashini, Community Development Director, City of Foster City  
Jean B. Savaree, City Attorney, City of Foster City  
Ms. Therese W. McMillan, ABAG Executive Director  
Mr. Alix Bockelman, ABAG Deputy Executive Director, Policy





## Proposed RHNA Methodology and Subregional Shares

Jill Ekas <JEkas@hmbcity.com>

Fri 11/27/2020 1:32 PM

To: Regional Housing Need Allocation <rhna@bayareametro.gov>

Cc: Bob Nisbet <BNisbet@hmbcity.com>

\*External Email\*

Methodology Committee:

The City of Half Moon Bay has reviewed the Cycle 6 RHNA methodology and preliminary RHNA for our jurisdiction. While we note that the anticipated increase over the Cycle 5 RHNA will be challenging for our City to accommodate; we recognize and appreciate that the methodology results in appropriate distribution of increased housing where it is most needed and best served in jobs-rich areas with transportation infrastructure.

As this process moves to the next phase, we wish to reinforce the soundness of the methodology in context with the San Mateo County coastside and our city. The City of Half Moon Bay is wholly within the Coastal Zone, lacks infrastructure including transit, is committed to maintaining agricultural land uses, contains numerous natural resources including environmentally sensitive habitat areas that support special status species, and is vulnerable to numerous land use hazards including wildland fires and flooding. As such, in our comprehensive Local Coastal Land Use Plan update (adopted by City Council October 2020, pending California Coastal Commission review) we focus new housing to be located and affordable to our local industries that support Coastal Act priority land uses: agriculture and service sectors. Our planning, in parallel with the approach of the RHNA methodology, stresses the importance of managing growth within the fragile coastal areas of San Mateo County and that growth broadly, including RHNA, cannot be on par with more urban areas that are best able to accommodate new households.

Thank you for extending the comment period and for considering our input.

Sincerely,



**Jill Ekas, AICP**  
Community Development Director  
501 Main Street, Half Moon Bay, CA 94019  
(650) 726-8264  
[www.hmbcity.com](http://www.hmbcity.com)

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While our doors are shut, staff are working from home and are available to serve the public virtually. Community Development staff can be reached by phone or email. Click [here](#) to view staff directory.

**\* Beginning July 2020, City Hall will be closed Fridays until further notice.\***

Hours of Operation:

- Community Development Department: Monday - Thursday, 8:30 AM – 5:00 PM.
- Building Inspections: Monday–Thursday, 8:00 AM–3:00 PM.

(Please call 650-726-8794 at least one day in advance to schedule your inspection. Friday inspections may be requested with 3 days advance notice for larger projects and final inspections.)

You can view the San Mateo County Health Officer's updated COVID-19 Shelter Order and FAQs [here](#).



**TOWN OF HILLSBOROUGH**  
*California*

November 10, 2020

Ms. Karen Mitchoff, Chair  
ABAG Regional Planning Committee  
c/o ABAG-MTC Public Information Office  
375 Beale St, Suite 800  
San Francisco, CA 94105

VIA EMAIL

**RE: Proposed RHNA Methodology and Subregional Shares**

Dear Chair Mitchoff:

I write on behalf of the Town of Hillsborough to provide comment on the proposed methodology for the RHNA 6 cycle and the draft subregion shares passed by the Executive Board at their meeting on October 15, 2020. The Town's comments are outlined in three sections, below.

*570% Increase in RHNA 6 Allocation Over Cycle 5*

If proposed methodology scenario 8a is adopted, the Town will receive an allocation of 640 units. This is in stark contrast to an allocation of 91 units in RHNA 5, equating to a prodigious 570% increase and the 3<sup>rd</sup> largest increase in San Mateo County. Satisfying this requirement will be impossible to achieve without *fundamental* changes to the Town's land use framework. The Town's General Plan, Zoning Ordinance and Design Guidelines—the key elements of our Town's constitution—will need to be rewritten in order to accommodate this inordinate level of growth. Further, this will be required by a jurisdiction that has consistently met their RHNA requirements. During cycles 1-4 the Town repeatedly met our targets, and we confidently anticipate the same for Cycle 5, not a statement that can be made by all. The Town requests that the final methodology should consider appropriately historical success in achieving RHNA targets.

*Wildland Urban Interface*

On February 18, 2020 Town staff reached out to ABAG staff with the Town's Wildland Urban Interface (WUI) map, requesting that they share with the Methodology Committee that approximately 60%-70% of Town is designated as within a high-fire severity zone (Attachment 1). Within that zone the Town is a hilly labyrinth of curvilinear streets, dead ends and cul-de-sacs that are especially difficult to navigate; particularly so with fire apparatus. With mitigations and structural hardening, increased density in these areas is certainly possible; however, the Town questions if these areas are truly where we as a region should be focusing on substantial growth, especially when considering our region's most vulnerable. In the October 15, 2020 presentation made to the ABAG Executive Committee, slide three stated that "Housing in high hazard areas is a concern, but RHNA may not be the best tool to address it."

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*Building and Planning Department*

Phone: (650) 375-7411 | Fax: (650) 375-7415 | 1600 Floribunda Ave., Hillsborough, CA 94010 | [www.hillsborough.net](http://www.hillsborough.net)



**TOWN OF HILLSBOROUGH**  
*California*

Slide nine further went on to state that, while considered, the Methodology Committee determined that natural hazards are addressed in the 2050 Blueprint documents, and as such should not be included as a methodology factor.

We would like to gently remind the Committee and Board that *this year alone* the State of California has experienced five of the six largest wildfires in our State's history, with the fires burning 4.1 million acres—more than doubling the State's previous record. In all too recent years we've also experienced an unmatched loss of life and property in communities such as Santa Rosa, Paradise and others. *These disasters are proof positive that the fires are not isolated to the wilderness. They're in our backyards.* The CZU complex fires this year in the Santa Cruz Mountains acutely demonstrated this for communities like ours in San Mateo County, who now must pause to ask the question: which of us is next?

Not addressing natural hazards in the methodology process seems rather cavalier at best; further mandating a substantial increase in the number of people living in hazard zone areas is simply reckless. The Town requests that the final methodology should consider appropriately documented natural hazards.

*Community Character and Sustainability*

While likely not the most heavily weighted by the Methodology Committee, the Regional Planning Committee and ABAG Board, we would be remiss if we did not restate that the changes that will be required of our community in order to make these numbers work will abrogate the Town's character—a character that has been cultivated over 100+ years. The Town is committed to doing our part, but we need our contribution requirement to be one that is reasonable, achievable, and, most importantly, safe.

Expecting a small community of ~3,500 homes to grow by almost 20% in a mere 8 years is unsustainable. The Town requests that the final methodology should consider appropriately sustainability and impacts on community character.

For the reasons outlined above, the Town respectfully asks that you reconsider the allocation methodology. Thank you for your consideration, and this opportunity to provide comment.

Sincerely,

Shawn Christianson  
Mayor  
Town of Hillsborough



---

**TOWN OF HILLSBOROUGH**  
*California*

Cc: Mr. Jesse Arreguin, President, ABAG Executive Board  
Ms. Shawn Christianson, Mayor, Town of Hillsborough  
Mr. Al Royce, Vice Mayor, Town of Hillsborough  
Ms. Marie Chuang, Councilmember, Town of Hillsborough  
Mr. Larry May, Councilmember, Town of Hillsborough  
Mr. Jay Benton, Councilmember, Town of Hillsborough  
Christopher Diaz, Esq., City Attorney

# ATTACHMENT 1

**Sarah Fleming**

---

**From:** Sarah Fleming  
**Sent:** Tuesday, February 18, 2020 2:01 PM  
**To:** gadams@bayareametro.gov; RHNA@bayareametro.gov  
**Cc:** Ann Ritzma; Eli Kaplan  
**Subject:** Town of Hillsborough: Wildland-Urban Interface & RHNA  
**Attachments:** Wildland Dec 2019 WUI.pdf; Wildland Nov 2019.pdf

Hi Ms. Adams,

I hope this message finds you well.

I'm the new Planning & Building Director for the Town of Hillsborough. I've had the pleasure of seeing you present at several recent RHNA-related events in the past month or so, and I'm writing to both introduce myself and to share some Hillsborough-specific hazards info that I'd like to request ABAG and the Methodology Committee to consider when finalizing recommendations for the next cycle RHNA allocations.

Because of our location in the transition zone between wildland and urban areas, Hillsborough is at a significantly greater risk for wildfire than many other jurisdictions in the Bay Area. In October 2018, the Central County Fire Department (CCFD) contracted with Anchor Point Group to conduct an independent fire severity assessment of CCFD's service areas (Burlingame, Hillsborough and Millbrae), and a resulting jurisdictional zone map was developed identifying levels of within what is known as the "Wildland-Urban Interface" (WUI). The assessment revealed that a significant percentage of properties within Hillsborough's jurisdiction (about 60%) fall into the high and very-high risk zones. The Town would like to provide this data for consideration.

For your reference, I've attached the 2019 staff reports outlining the process by which our new maps were developed and ordinance was adopted, and the CCFD website which has additional WUI information:

<http://www.ccfdonline.org/wui/>.

The Town is committed to doing our part in addressing the acute need for housing, as can be seen by our progress in meeting our current RHNA cycle goals, and we're hopeful that ABAG will take into consideration the very real WUI risks faced by our community while developing the next cycle RHNA methodology.

Thank you for your hard work on the RHNA process, as well as for your time and consideration of this study. I'd be happy to chat with you and/or the Committee about this in more detail, should there be an interest.

All the best,  
Sarah

**Sarah A. Fleming, AICP**  
Director, Department of Building & Planning

Town of Hillsborough  
1600 Floribunda Avenue  
Hillsborough, CA 94010

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# TOWN OF HILLSBOROUGH

San Mateo County  
1600 Floribunda Avenue  
Hillsborough, CA 94010

# 5

**PUBLIC HEARING  
CITY COUNCIL MEETING  
DECEMBER 09, 2019**

## AGENDA STAFF REPORT

### **ITEM SUBJECT: ORDINANCE AMENDING SECTION 15.21.020 OF THE HILLSBOROUGH MUNICIPAL CODE REGARDING THE WILDLAND-URBAN INTERFACE ORDINANCE - INTRODUCTION, AND RESOLUTION ADOPTING THE FIRE SEVERITY ASSESSMENT MAP DESIGNATING ADDITIONAL PARCELS WITHIN WILDLAND-URBAN INTERFACE AREAS IN THE TOWN OF HILLSBOROUGH**

**SUMMARY:** In October 2018, Central County Fire Department (CCFD) contracted with Anchor Point Group to conduct an independent fire severity assessment of CCFD's service areas (Burlingame, Hillsborough and Millbrae). A jurisdictional zone map was developed detailing the assessment evaluation results by separating areas into low, medium, high and very high-risk zones with associated parcels identified.

The recent assessment revealed high, medium and low fire severity zones within the Town of Hillsborough. In June 2019, the City Council approved the revision of the Town of Hillsborough Wildland-Urban Interface (WUI) ordinance, which identified very high and high risk zones as WUI areas. The high fire severity area in the most recent assessment includes additional parcels beyond the close to 1,800 parcels already identified in the June 2019 WUI revision. To adequately and uniformly apply the revised WUI ordinance, CCFD recommends including the high fire severity parcels from the recent assessment as WUI areas, and through the City Council's adoption of the resolution, it would make all parcels noted on the map subject to the WUI ordinance. A minor modification to the existing WUI ordinance is also included to make it clear that the City Council can establish areas subject to the WUI ordinance by adoption of a resolution.

**FISCAL IMPACT:** There is no fiscal impact in declaring the identified parcels as wildland-urban interface areas.

**ENVIRONMENTAL ISSUES:** Any potential environmental issue related to fuel modification on these parcels will be addressed through the application of the Wildland-Urban Interface ordinance. The City Council's adoption of the ordinance and resolution are not actions that are anticipated to have the potential for causing a significant effect on the environment pursuant to the California Environmental Quality Act (CEQA) Guideline 15061(b)(3), the common sense exemption. The ordinance and resolution are actions specific to designating parcels that would be subject to heightened wildfire requirements that are designed to reduce wildfire spread and impacts. As such, it can be seen with certainty that there is no possibility that the activity in question will have a significant effect on the environment. Further, the City Council's action is also exempt from environmental review pursuant to CEQA Guidelines 15307 and 15308 as actions for protection of natural resources and the environment.

**ATTACHMENTS:**

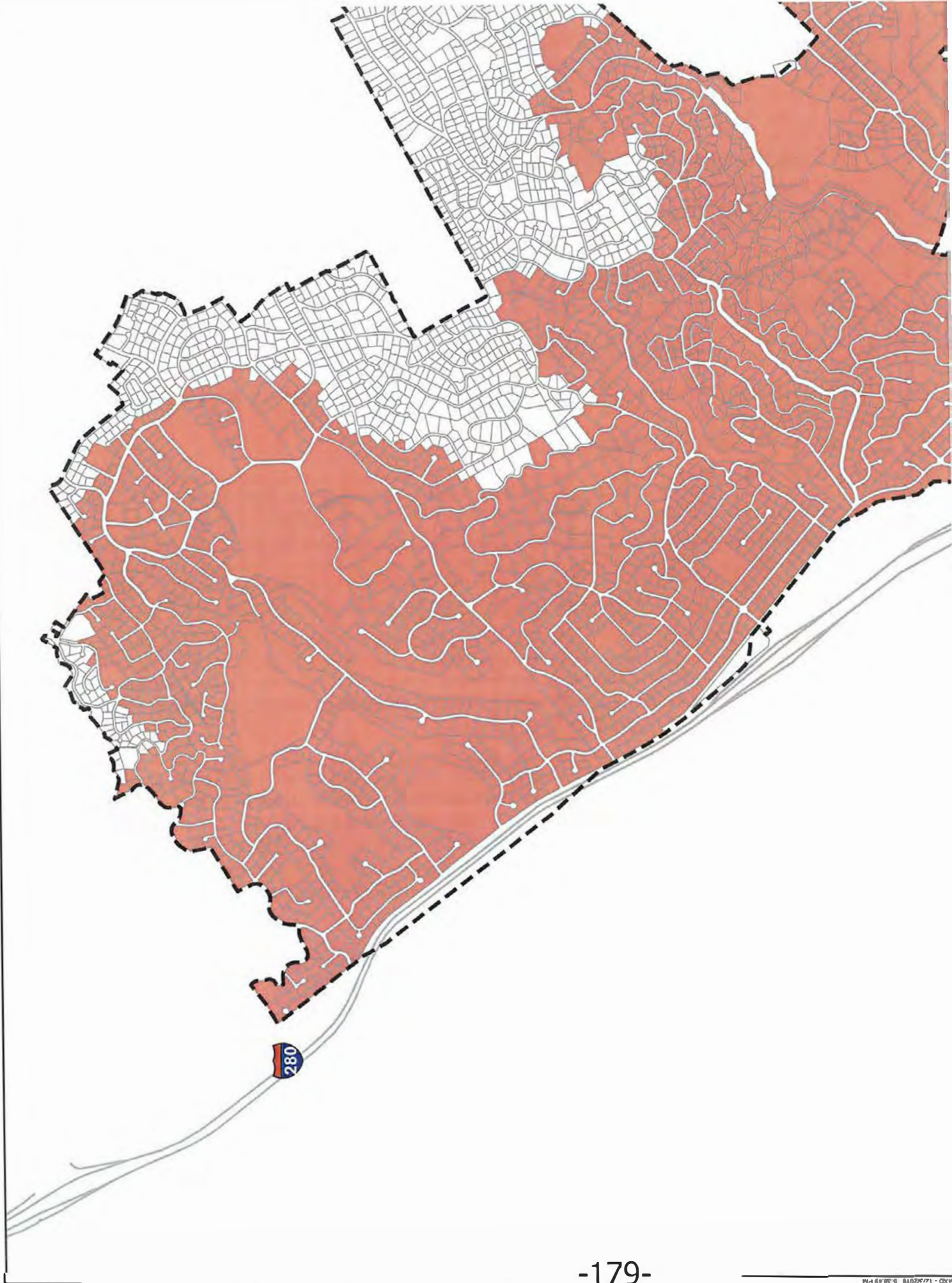
1. Assessment Map
2. Ordinance
2. Resolution

**PREPARED BY:** John Kammeyer, Fire Chief

**RECOMMENDATION:**

1. Open the public hearing and receive comments;
2. Close the public hearing;
3. Introduce the ordinance entitled "Ordinance of the City Council of the Town of Hillsborough Amending Section 15.21.020 of the Hillsborough Municipal Code Regarding the Wildland-Urban Interface Ordinance", and waive further reading beyond the title; and
4. Adopt the resolution adopting the fire severity assessment map designating additional parcels included within the wildland-urban interface areas in the Town of Hillsborough.





ORDINANCE NO. \_\_\_\_

ORDINANCE OF THE CITY COUNCIL OF THE TOWN OF HILLSBOROUGH  
AMENDING SECTION 15.21.020 OF THE HILLSBOROUGH MUNICIPAL CODE  
REGARDING THE WILDLAND URBAN INTERFACE ORDINANCE

BE IT ORDAINED BY THE CITY COUNCIL OF THE TOWN OF HILLSBOROUGH,  
as follows:

**Section 1.     Section 15.21.020 (E) Amended.**

Subsection (E) of Section 15.21.020, "Adoption" is hereby amended as follows:

**15.21.020     Adoption.**

E.     Specific parcels of wildland-urban interface areas shall be as shown on the wildland area interface map attached here to as Exhibit A as adopted by resolution of the City Council, and shall be made a part of this Chapter. The map shall be on file in the Office of the City Clerk. The legal description of such areas is as described as follows: (1) All parcels identified as Very High Fire Hazard Severity Zones as recommended by the Director of California Department of Forestry and Fire Protection and as designated on a map titled Fire Hazard Severity Zones in LRA, Hillsborough, and (2) All parcels identified as High and Very High Fire Hazard Severity Zones consistent with California Department of Forestry and Fire Protection standards for determining Fire Hazard Severity Zones by the Town of Hillsborough's Community Assessment conducted in 2018. For the purposes of this Chapter, those parcels shall be designated as "Wildland Urban Interface Areas".

**Section 2.**     The City Council hereby finds that the amendment procedure contained at Hillsborough Municipal Code Section 15.21.110 with regard to amendments to the Wildland Urban Interface, or "WUI" Ordinance, is not applicable to this ordinance as the language being amended is not part of the International Wildland-Urban Interface Code, 2018 Edition, such that an express finding for any local amendments to the International Code is not required. The City Council hereby finds that the language being amended is specific to the Town's code and is not altering any of the language within the International Code.

**Section 3.**     If any section, subsection, sentence, clause, phrase, or portion of this ordinance is for any reason held to be unconstitutional or otherwise invalid by the decision of any court of competent jurisdiction, such decision shall not affect the validity of the remaining portions of this ordinance. The city council of the Town of Hillsborough hereby declares that it would have adopted the remainder of this ordinance, including each section, subsection, sentence, clause, phrase, or portion irrespective of the invalidity of any other article, section, subsection, sentence, clause, phrase, or portion.

**Section 4.** This ordinance shall be printed and posted upon the three official bulletin boards of the Town of Hillsborough and shall be effective thirty days after adoption.

\_\_\_\_\_  
Mayor of the Town of Hillsborough

\_\_\_\_\_  
Attest: City Clerk

ORDINANCE NO. \_\_\_\_ of the Town of Hillsborough introduced on \_\_\_\_\_, 2019,  
and adopted on \_\_\_\_\_, 2020, by the following vote of the City Council:

AYES: Councilmembers \_\_\_\_\_

NOES: Councilmembers \_\_\_\_\_

ABSENT: Councilmembers \_\_\_\_\_

ABSTAIN: Councilmembers \_\_\_\_\_





# TOWN OF HILLSBOROUGH

San Mateo County  
1600 Floribunda Avenue  
Hillsborough, CA 94010

# 7

OLD BUSINESS  
CITY COUNCIL MEETING  
NOVEMBER 12, 2019

## AGENDA STAFF REPORT

### ITEM SUBJECT: FIRE SEVERITY ASSESSMENT MAP DESIGNATING ADDITIONAL PARCELS WITHIN WILDLAND-URBAN INTERFACE AREAS IN THE TOWN OF HILLSBOROUGH

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**SUMMARY:** In October 2018, Central County Fire Department contracted with Anchor Point Group to conduct an independent fire severity assessment of Central County Fire Department's service areas (Burlingame, Hillsborough and Millbrae). A jurisdictional zone map was developed detailing the assessment evaluation results by separating areas into medium, high and very high-risk zones with associated parcels identified.

The recent assessment revealed high and medium fire severity zones within the Town of Hillsborough. In June 2019, the City Council approved the revision of the Town of Hillsborough Wildland-Urban Interface (WUI) ordinance, which identified very high and high risk zones as WUI areas. The high fire severity area in the most recent assessment includes additional parcels beyond the close to 1,800 parcels identified in the June 2019 WUI revision. The recent fire severity assessment shows that there are approximately 2,200 high fire severity parcels. To adequately and uniformly apply the WUI ordinance, CCFD recommends including the high fire severity parcels from the recent assessment as WUI areas.

**FISCAL IMPACT:** There is no fiscal impact in declaring the identified parcels as wildland-urban areas.

**ENVIRONMENTAL ISSUES:** Any potential environmental issues related to fuel modification on these parcels will be addressed through the application of the Wildland-Urban Interface ordinance.

#### ATTACHMENTS:

1. Assessment Map
2. Anchor Point Group Proposal
3. CCFD Evacuation Memo
4. CCFD WUI Educational Booklet

**PREPARED BY:** John Kammeyer, Fire Chief

**RECOMMENDATION:** Set December 9, 2019, as the public hearing date for adoption of a resolution adopting the fire severity assessment map and designating additional parcels included within the wildland-urban interface areas in the Town of Hillsborough; and notice the additional parcel owners of the public hearing.





**ANCHOR POINT  
SERVICES AGREEMENT  
(FIRE MANAGEMENT  
SERVICES)**

---

**DATE:** October 17, 2018

**PARTIES:** **Central County Fire Department**, 1399 Rollins Road, Burlingame, CA 94010 ("District").  
**San Mateo Fire Department**, 1040 East Hillsdale Blvd. Foster City 94403 ("District").

**ANCHOR POINT GROUP**, a Colorado corporation, 2131 Upland Avenue, Boulder, Colorado 80304 ("Consultant").

**TERMS:**

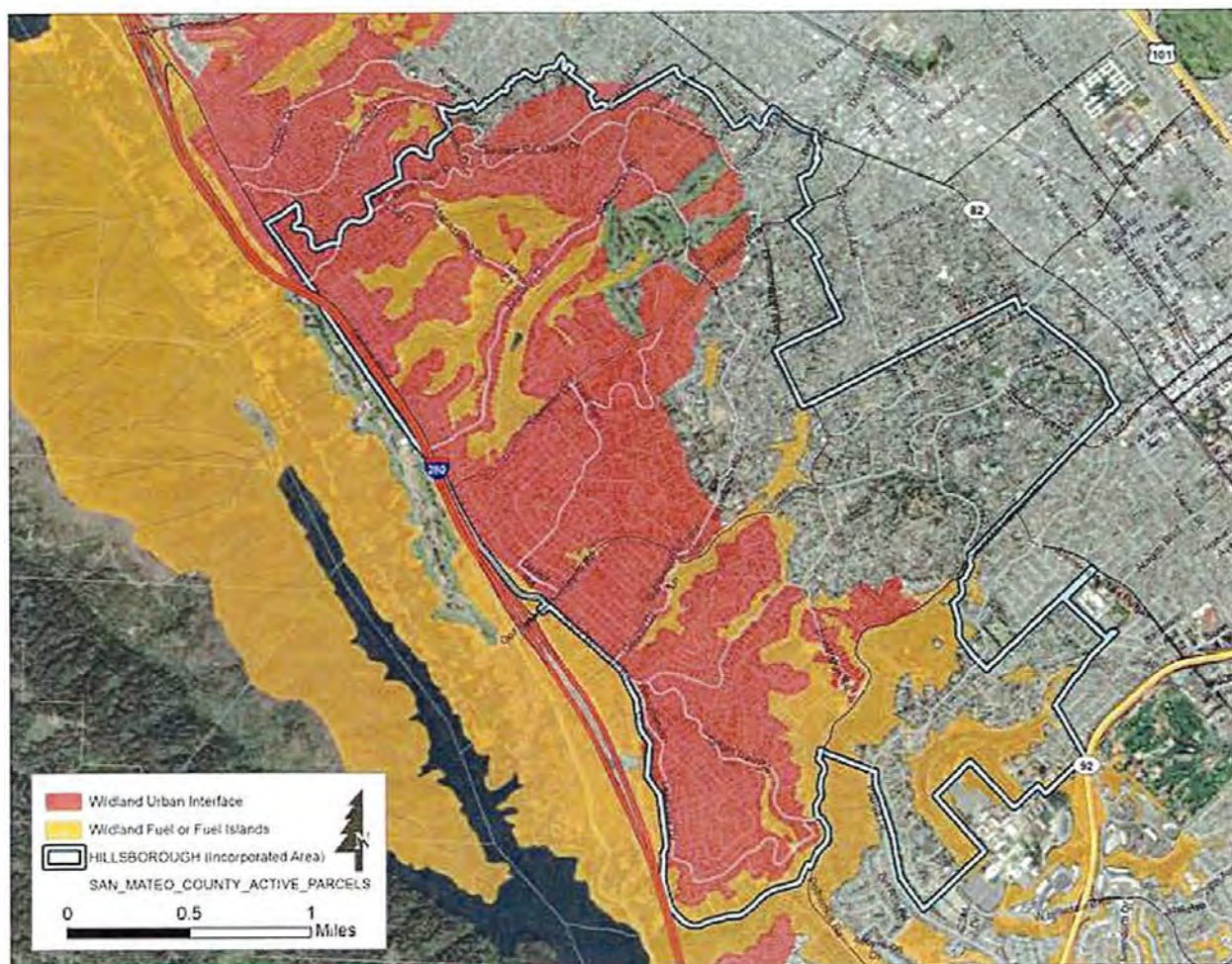
**Section 1. Scope of Services.** Consultant shall provide fire management services, in accordance with the Scope of Work attached as ***Exhibit 1*** (the "Services").

**Section 2. Payment.** Lump Sum fee is \$76,600. Lump sum contract value will be assigned to two entities, Central County Fire contributing \$46,800 and San Mateo Fire Contributing \$19,000 for assessment and \$10,800 for web interface on separate invoices. An initial 20% invoice will be sent upon execution of the contract, equaling \$9,360 to Central County Fire and \$5,960 to San Mateo Fire. Consultant shall invoice Districts monthly, thereafter, with final invoice to be paid upon the District's approval of final deliverables as per the Scope of Work. District shall pay such invoices within 30 days receipt of such invoice. In no event shall the cumulative payment to Consultant exceed \$76,600, unless authorized in writing by Districts.

**Section 3. Completion.** Consultant shall commence the Services upon execution of this Agreement and complete the Services not later than September 1, 2019. Consultant shall devote adequate resources to assure timely completion of the Services. Consultant shall perform the Services under this Agreement using a standard of care, skill and diligence ordinarily used by reputable professionals performing under circumstances similar to those required by this Agreement.

Districts shall have the right to terminate this Agreement at any time with 30 days written notice to Consultant. The District's only obligation in the event of termination shall be payment of fees and expenses incurred up to and including the effective date of termination. Consultant shall turn over all work product produced up to the date of termination.









**Section 4. Subcontractors.** Consultant may utilize subcontractors to assist with specialized works as necessary to complete the Services. Consultant will submit any proposed subcontractor and the description of their services to the Districts for approval.

**Section 5. Assignment.** This Agreement shall not be assigned by Consultant without the written consent of the Districts.

**Section 6. Notice.** Any notice required or permitted by this Agreement shall be in writing and shall be deemed to have been sufficiently given for all purposes if sent by certified mail or registered mail, postage and fees prepaid, addressed to the party to whom such notice is to be given at the address set forth on the first page of this Agreement, or at such other address as has been previously furnished in writing to the other party or parties. Such notice shall be deemed given when deposited in the United States mail.

**Section 7. Prohibition against Employing Illegal Aliens.** Consultant shall not knowingly employ or contract with an illegal alien to perform work under this contract. Consultant shall not enter into a contract with a subcontractor that fails to certify to the Consultant that the subcontractor shall not knowingly employ or contract with an illegal alien to perform work under this contract.

Consultant has confirmed the employment eligibility of all employees who are newly hired for employment to perform work under the public contract for services through participation in either the E-verify program or the Department program, as defined in C.R.S. §§ 8-17.5-101(3.3) and 8-17.5-101(3.7), respectively. Consultant is prohibited from using the E-verify program or Department program procedures to undertake pre-employment screening of job applicants while this contract is being performed.

If Consultant obtains actual knowledge that a subcontractor performing work under this Agreement for services knowingly employs or contracts with an illegal alien, Consultant shall:

A. Notify the subcontractor and the Districts within three days that the Consultant has actual knowledge that the subcontractor is employing or contracting with an illegal alien; and

B. Terminate the subcontract with the subcontractor if within three days of receiving notice required pursuant to this paragraph the subcontractor does not stop employee or contracting with the illegal alien; except that the Consultant shall not terminate the contract with the subcontractor if during such three days the subcontractor provides information to establish that the subcontractor has not knowingly employed or contracted with an illegal alien.

Consultant shall comply with any reasonable request by the Department of Labor and Employment made in the course of an investigation that the Department is undertaking pursuant to the authority established in C.R.S. §8-17.5-102(5).



If Consultant violates a provision of this Agreement required pursuant to C.R.S. §8-17.5-102, Districts may terminate the Agreement for breach of contract. If the Agreement is so terminated, the Consultant shall be liable for actual and consequential damages to the Districts.

**Section 8. Insurance.** Consultant agrees to procure and maintain, at his own cost, the following policy or policies of insurance. Consultant shall not be relieved of any liability, claims, demands or other obligations assumed pursuant to this Agreement by reason of its failure to procure or maintain insurance, or by reason of its failure to procure or maintain insurance in sufficient amounts, durations, or types.

A. Consultant shall procure and maintain a policy with the minimum insurance coverage listed below. Such coverage shall be procured and maintained with forms and insurers acceptable to the Districts. All coverage shall be continuously maintained from the date of commencement of services hereunder. In the case of any claims-made policy, the necessary retroactive dates and extended reporting periods shall be procured to maintain such continuous coverage.

1. Workers Compensation insurance to cover obligations imposed by the Workers Compensation Act of Colorado and any other applicable laws for any employee engaged in the performance of Work under this contract, and Employer's Liability insurance with minimum limits of \$1,000,000 each accident, \$1,000,000 disease-policy limit, and \$1,000,000 disease-each employee.

2. Comprehensive General Liability insurance with minimum combined single limits of ONE MILLION DOLLARS (\$1,000,000) each occurrence and THREE MILLION DOLLARS (\$3,000,000) aggregate. The policy shall be applicable to all premises and operations. The policy shall include coverage for bodily injury, broad form property damage (including for contractual and employee acts), blanket contractual, independent contractors, products, and completed operations. The policy shall contain a severability of interests' provision.

3. Comprehensive Automobile Liability Insurance with minimum combined single limits for bodily injury and property damage of not less than ONE MILLION DOLLARS (\$1,000,000) each occurrence and ONE MILLION DOLLARS (\$1,000,000) aggregate with respect to each of Consultant's owned, hired and/or non-owned vehicles assigned to or used in performance of the services. The policy shall contain a severability of interests provision.

4. Professional Liability insurance with minimum limits of ONE MILLION DOLLARS (\$1,000,000) per claim and ONE MILLION DOLLARS (\$1,000,000) aggregate.

B. The policies required above, except Workers' Compensation insurance, Employers' Liability insurance and Professional Liability insurance shall be endorsed to include the District's officers and employees, as an additional insured. Every policy required above, except Workers' Compensation and Professional Liability insurance, if applicable, shall be primary insurance, and any insurance carried by the Districts, its officers, or its employees, shall be excess and not contributory insurance to that provided



by Consultant.

C. Certificates of insurance shall be completed by Consultant's insurance agent as evidence that policies providing the required coverage, conditions and minimum limits are in full force and effect, and shall be subject to review and approval by the Districts. Each certificate shall identify the Project and shall provide that coverage afforded under the policies shall not be cancelled, terminated or materially changed until at least 30 days prior written notice has been given to the District. If the words "endeavor to" appear in the portion of the certificate addressing cancellation, those words shall be stricken from the certificate by the agent(s) completing the certificate. The Districts reserves the right to request and receive a certified copy of any policy and any endorsement thereto.

D. Failure on the part of Consultant to procure or maintain policies providing the required coverage, conditions, and minimum limits shall constitute a material breach of contract upon which at the District's discretion may procure or renew any such policy or any extended connection therewith, and all monies so paid by the Districts shall be repaid by Consultant to the Districts upon demand, or the Districts may offset the cost of the premiums against any monies due to Consultant from the Districts.

**Section 9. Indemnification.** Consultant expressly agrees to indemnify and hold harmless Districts or any of its officers or employees from any and all claims, damages, liability, or court awards including attorney's fees that are or may be awarded as a result of any loss, injury or damage sustained or claimed to have been sustained by anyone, including, but not limited to, any person, firm, partnership, or corporation, to the extent caused by the negligent acts, errors or omissions of Consultant or any of their employees or agents in performing work pursuant to this Agreement. In the event that any such suit or action is brought against Districts, Districts will give notice within ten (10) days thereof to Consultant.

**Section 10. Delays.** Any delays in or failure of performance by any party of his or its obligations under this Agreement shall be excused if such delays or failure are a result of acts of God, fires, floods, strikes, labor disputes, accidents, regulations or orders of civil or military authorities, shortages of labor or materials, or other causes, similar or dissimilar, which are beyond the control of such party.

**Section 11. Additional Documents.** The parties agree to execute any additional documents or take any additional action that is necessary to carry out this Agreement.

**Section 12. Entire Agreement.** This Agreement represents the entire agreement between the parties and there are no oral or collateral agreements or understandings. This Agreement may be amended only by an instrument in writing signed by the parties. If any other provision of this Agreement is held invalid or unenforceable, no other provision shall be affected by such holding, and all of the remaining provisions of this Agreement shall continue in full force and effect.



**Section 13. Time of the Essence.** Time is of the essence. If any payment or any other condition, obligation, or duty is not timely made, tendered or performed by either party, then this Agreement, at the option of the party who is not in default, may be terminated by the non-defaulting party, in which case, the non-defaulting party may recover such damages as may be proper.

**Section 14. Default and Remedies.** In the event either party should default in performance of its obligations under this agreement, and such default shall remain uncured for more than 10 days after notice of default is given to the defaulting party, the non-defaulting party shall be entitled to pursue any and all legal remedies and recover its reasonable attorney's fees and costs in such legal action.

**Section 15. Waiver.** A waiver by any party to this Agreement of the breach of any term or provision of this Agreement shall not operate or be construed as a waiver of any subsequent breach by either party.

**Section 16. Governing Law.** This Agreement shall be governed by the laws of the State of California.

**Section 17. Independent Contractor.** Consultant and Districts hereby represent that Consultant is an independent contractor for all purposes hereunder. As such, Consultant is not covered by any worker's compensation insurance or any other insurance maintained by Districts except as would apply to members of the general public. Consultant shall not create any indebtedness on behalf of the Districts.

**Section 18. No Third-Party Beneficiaries.** It is expressly understood and agreed that enforcement of the terms and conditions of this Agreement, and all rights of action relating to such enforcement, shall be strictly reserved to Districts and Consultant, and nothing contained in this Agreement shall give or allow any such claim or right of action by any other third party on such Agreement. It is the express intention of the parties that any person other than Districts or Consultant receiving services or benefits under this Agreement shall be deemed to be an incidental beneficiary only.



ATTEST:

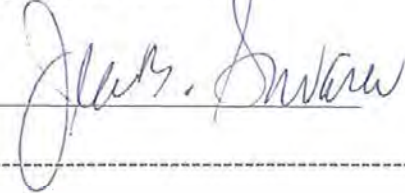
Central County Fire





Approved as to form:

Approved as to content:



\_\_\_\_\_

ATTEST:

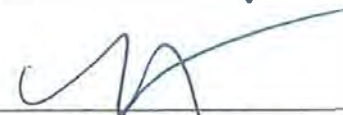
San Mateo Fire

\_\_\_\_\_



Approved as to form:

Approved as to content:



Bahar Abdollahi, Asst. City Atty.  
City of San Mateo


\_\_\_\_\_

CONSULTANT:

ANCHOR POINT

A Colorado corporation

By:



Chris White

Its:

C.O.O.



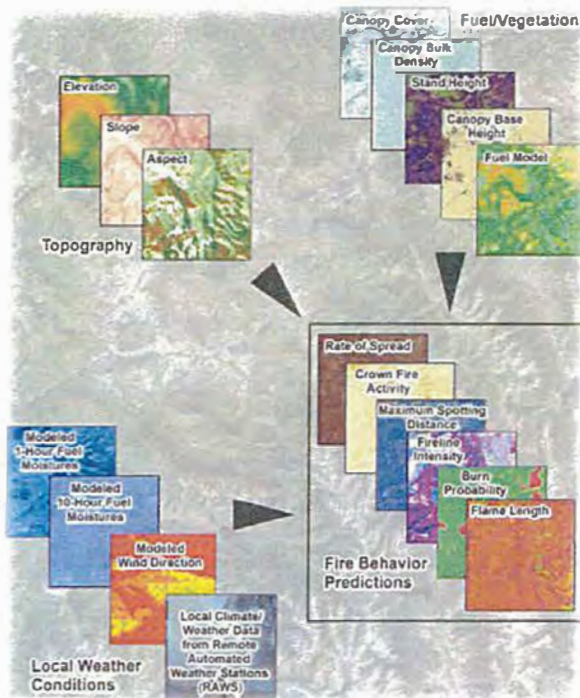
# Exhibit 1

## Scope of Work

*Confidential and Proprietary, © 2018 The Anchor Point Group, LLC., ALL RIGHTS RESERVED*

*Any and all graphics included in this SOW are for illustrative and representative purposes only and shall not be relied upon as depictions of the final deliverables.*

**No-HARM** wildfire hazard/risk assessment system. Advanced fire behavior modeling methods from FlamMap will take local information about fuel, weather and topography and generate predictions of fire behavior. This raw information has been interpreted and weighted to be applicable to assess the hazard/risk to structures and infrastructure from wildfire.



No-HARM also incorporates historic wildfire occurrence in predicting the potential for wildfire activity in the future. By using historic ignition points and fire perimeters to simulate future fire seasons, the model provides the probability that an area will burn in any given year. In addition to fire behavior and probability of occurrence, the No-HARM evaluates the built environment. Factors such as parcel density, road system complexity, distance to fire stations and other anthropogenic elements are factored into the final ratings. Additionally, the model incorporates Foehn wind adjustments, and evaluates areas that are susceptible to embers, smoke and may pose evacuation complications. Because it provides a consistent, district-wide assessment of wildfire threat, No-HARM is ideal for informing a variety of policy, management, pre-planning and code administration decisions. By

comparing locations of values-at-risk to these fire-prone areas, efforts to protect homes and property can be focused, increasing effectiveness, limiting costs and promoting local action. Similarly, proper assessment of threat to critical infrastructure can reduce potentially catastrophic interruption in vital services.

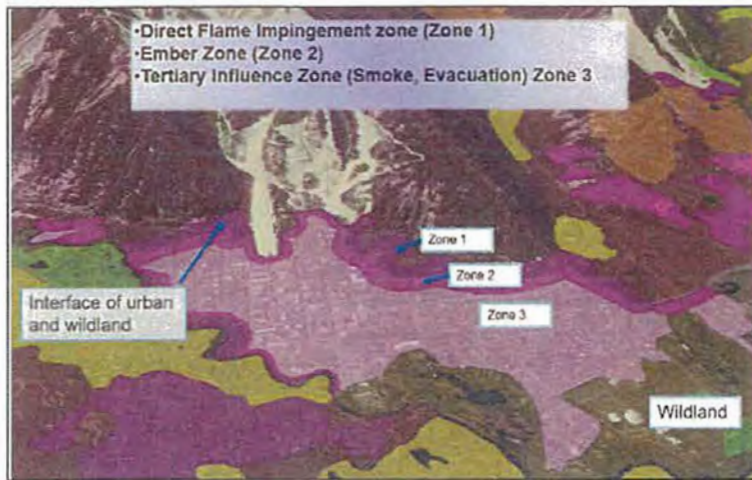
The No-HARM product provides access to FireSheds with a wildfire hazard assigned for each. FireSheds average 150-175 acres in size. No-HARM also includes the interface zones which define vulnerability to direct flame contact, embers, smoke and fire penetration into urban / suburban town areas. These base data can be overlaid with Town or county boundaries, or other polygons made available. No-HARM allows access to the extensive attribute data contained within the delivered shapefiles. The final data set includes information used en-route to producing the overall hazard/risk ratings in the No-HARM FireSheds. This data can be

utilized to generate statistics and make custom maps to support wildfire pre-planning and land use decisions. Users can more easily understand where the hazards exist within their area, and what has contributed to the hazards, leading to a more educated user. The Town can then reference existing materials that further explain the issues. For instance, if a community is found to have a significant area of high risk, the Town can link to information from multiple sources to address the issue. Hillsborough can connect with communities to develop land use practices that will encourage inter-governmental cooperation while providing for life safety first.

## 2.2 Custom Data Enhancements

Anchor Point staff will work with the Towns of Burlingame, Hillsborough, Milbrae, San Mateo, Belmont, Fire Departments and stakeholders to refine the national scale model with local data and customize the final product.

The custom level of No-HARM™ refines the national and regional scale data inputs to local and neighborhood levels to provide for increased accuracy of risk assessment.



The custom level of No-HARM includes more locally-focused (as compared to the nation-wide data set), custom input data layers.

Custom No-HARM includes:

- Custom fuel modeling.
  - Includes field verification where needed.
- Modification of the existing fuels layer to include completed fuel reduction projects.
- Refinement of the WUI line that separates FireSheds from

Ember Zones.

- For example, it is possible to utilize home footprints (if available from the Town) instead of parcel centroids, to ascertain the location of the wildland urban interface.
- Digitizing golf courses, ball fields, open spaces and fuel islands to allow for enhancements in the model.
- Street distance travel to fire stations
- Detailed ember zone / suburban fire penetration modeling
- Ensure the stakeholder group agrees with the model's accuracy, form and function.

## Web Mapping and Data Visualization

The web map interface is about the user interaction, customization of the data, and empowering the Towns through intuitive visualization of the data. Anchor Point has developed a user interface specifically designed to warehouse and utilize the No-HARM data. This interface includes the ability for the No-HARM database to be accessed seamlessly on desktop or tablet. This system is invaluable in the facilitation of wildfire mitigation assessments, projects and overall maintenance of the program. The portal includes:

- Variety of base maps (aerial, street and topo)
- Overlay legends and opacity control
- Data response for multiple points (terrain, elevation, slope, aspect, No-HARM risk description)

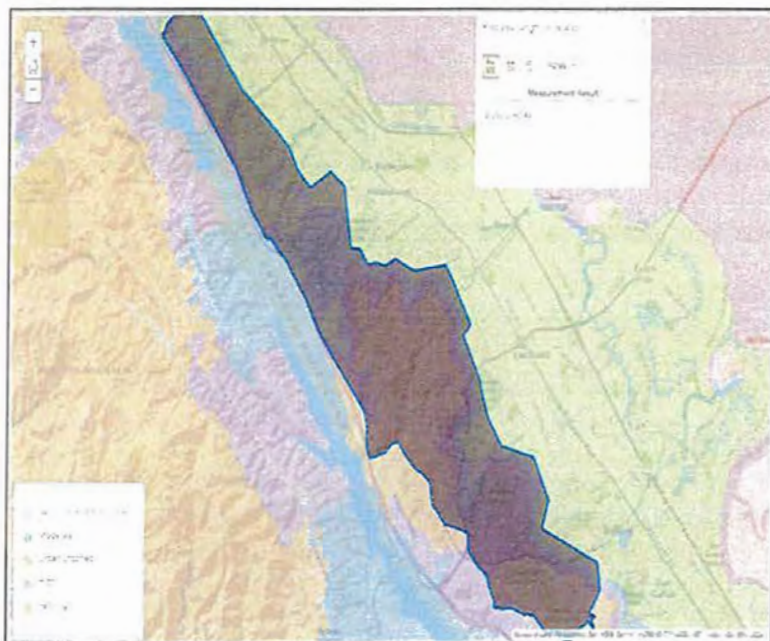


- o Addition Authorized Content
  - geocoder
  - measuring tool
  - No-HARM overlay with FireSheds
  - fire Behavior layers
  - three static client overlays (at no additional cost- i.e. home footprints, jurisdictional boundaries, FRAP layer etc.)
  - data response includes detailed No-HARM values

Although our platform is very intuitive, we also provide excellent support.



This screen capture shows an example of our user interface which contains an address search, measuring tool and analysis capabilities. Area of study is identified below







# City of Larkspur

400 Magnolia Avenue, Larkspur, California 94939

Telephone: (415) 927-5110 Fax: (415) 927-5022

Website: [www.cityoflarkspur.org](http://www.cityoflarkspur.org)

November 18, 2020

Mayor Jesse Arreguin, President  
Association of Bay Area Governments (ABAG) Executive Board  
375 Beale Street, Suite 700  
San Francisco, CA 94105-2066  
[jarreguin@ci.berkeley.ca.us](mailto:jarreguin@ci.berkeley.ca.us)

Re: Request for Plan Bay Area 2050 Household Growth as Baseline for Regional Housing Needs Allocation (RHNA) Methodology

Mayor Arreguin:

On behalf of the Larkspur City Council, we submit the following comments on the proposed Regional Housing Needs Allocation (RHNA) methodology under consideration by the ABAG Executive Board. Foremost, we want to emphasize that the Larkspur City Council acknowledges the region-wide need for more housing and is committed to planning for our fair share of that growth. The Council is very appreciative of the work done by the ABAG staff and the Housing Methodology Committee that shaped the RHNA process to date.

The Larkspur City Council recommends the Executive Board follow ABAG staff's July 2020 suggestion to use the Draft Blueprint in the RHNA methodology by using each jurisdiction's share of Household Growth from 2010 to 2050 as the baseline. While the City would prefer a baseline that includes jobs, we support the Household Growth baseline as it results in allocations that reflect jurisdictions with significant jobs that are experiencing growth, including communities that have elected to identify Priority Development Areas in their jurisdictions. "This approach is consistent with how long-range forecasts have been used in ABAG's methodologies for previous RHNA cycles." (July 9, 2020, HMC Meeting #8, Item 6a, Attachment A, Page 3). In addition, the State Housing and Community Development Department (HCD) has already approved using regional plan household growth as a baseline for 4 of the 8 approved 6th Cycle RHNA methodologies (with 3 others using baselines that factor in jobs, and one using a variety of factors). This approach to use the Plan Bay Area 2050 *Growth* baseline would seem more consistent with the intent of the Plan to encourage housing development in proximity to job centers, which reduces transit and transportation congestion and long commute patterns to meet greenhouse gas reduction targets (consistent with AB 32 and SB 375).

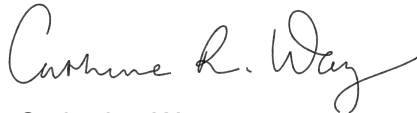
The advantages of this baseline are summarized by ABAG staff (July 9, 2020, HMC Meeting #8, Item 6a, Attachment A, Page 3):

- Simple and straightforward to implement and discuss (e.g., "the methodology aligns with growth predicted by Plan Bay Area 2050")
- Integrates transit, hazards, and market feasibility through strategies and modeling
- Better aligned with Plan Bay Area 2050

- Emphasis on current and future employment development patterns leads to RHNA allocations more focused in Silicon Valley, region's largest job center
- Higher RHNA allocations in high resource areas near major job centers – notably in the South Bay

The Larkspur City Council understands the challenge of balancing competing interests when developing a model such as that used to calculate RHNA. That said, recent wildfire seasons require reevaluation of plans and priorities that would intensify development in and around wildland-urban interface (WUI) fire threat areas. The methodology before the Executive Board distributes considerable portions of the RHNA to suburban and rural communities constrained by WUI and creates the very real possibility that these communities will have to plan for more housing in these high-risk areas. We also believe greater recognition of the locations of flood plains and shorelines vulnerable to sea-level rise will better inform the RHNA process and lead to allocations that have a higher probability of resulting in safe, affordable new housing units.

Sincerely,



Catherine Way  
Mayor



Kevin Haroff  
Vice-Mayor and Larkspur ABAG Representative

c: Dennis Rodoni, Supervisor, County of Marin  
Pat Eklund, Mayor Pro Tem, City of Novato



November 25, 2020

Jesse Arreguin, Executive Board President  
Association of Bay Area Governments  
Bay Area Metro Center  
375 Beale Street, Suite 800  
San Francisco, CA 94105-2066

RE: Public Comment on Proposed RHNA Methodology

Dear President Arreguin and Honorable ABAG Executive Board Members:

On behalf of the City of Los Altos, we would like to thank ABAG's leadership and staff for all of your hard work and dedication over the course of the past year through the Housing Methodology Committee (HMC) process.

The City of Los Altos, in agreement with the Cities Association of Santa Clara County, objects to a methodology that allocates the largest share to Santa Clara County and unreasonable shares to the City of Los Altos. We further agree with the Cities Association that the RHNA process should be delayed until the State has a better understanding of the impact of COVID, including but not limited to the impact on job and household growth based on the increase in the number of employers allowing employees to telecommute. Additionally, we share the concerns of the Cities Association that a significant portion of the underlying data used in Plan Bay Area 2050 is inaccurate, incomplete and/or outdated.

Like many cities, Los Altos has struggled to meet the much lower numbers that were assigned to us in the previous RHNA process. Assigning even higher numbers, that are completely unrealistic for our city to meet, serves no purpose. We are open and willing to work with ABAG staff to identify the areas where we can expect future development and provide some estimates of what is achievable. We recommend that a realistic approach be used, and support be provided, to identify barriers to building more housing and help local communities like Los Altos tackle those barriers that we can realistically address.

Finally, we understand that the total number of units for the nine Bay Area region was determined by the California Department of Housing and Community Development (HCD). Therefore, we strongly urge ABAG to join us in advocating against moving forward with the RHNA process at this time. Proceeding now will only set local communities up to fail, like Los Altos, and still not help to solve the problem. Instead, we recommend that the HCD, ABAG and representatives from

all cities be invited to partner on developing housing solutions that are realistic and achievable.  
Thank you for hearing our voice and taking appropriate action.



Janis C. Pepper, Mayor



Neysa Fligor, Vice Mayor

cc: Megan Kirkeby, Deputy Director Housing Policy Division, California Department Of  
Housing and Community Development  
Joe Harney, Legislative Division, California Department Of Housing and Community  
Development  
Santa Clara County Cities Association  
Carolyn Coleman, Executive Director, League of California Cities  
Jason Rhine, Legislative Director, League of California Cities  
Seth Miller, Regional Public Affairs Manager, League of California Cities – Peninsula  
Division



LOS ALTOS HILLS



CALIFORNIA

November 20, 2020

Honorable Jesse Arreguin  
ABAG Executive Board  
Bay Area Metro  
375 Beale Street  
San Francisco, CA 94105

RE: Public Comment on Proposed RHNA Methodology

Dear Board President Arreguin and Members of the Executive Board:

On behalf of the Town of Los Altos Hills, please accept these comments when you move forward with consideration of the proposed Regional Housing Needs Allocation (RHNA) Methodology for the upcoming housing cycle. The Town is fully committed to doing its part to plan for new housing that supports the needs of our community and the greater Bay Area region, but we have serious concerns that the process is moving forward without proper consideration of the new reality that our community and the State now face.

It is too early to know the full extent of how the Covid-19 pandemic will impact the Bay Area economy and long-term growth of our region, but it is undeniable that it will have a meaningful effect on our economy, employment and the very nature of how people live and work. Thus, we are strongly encouraging the Executive Board to recognize this reality, take a pause in the RHNA Methodology process and work with the State and other regional planning partners to study and understand the ramifications that the pandemic will have on the Bay Area region before finalizing the Methodology.

In addition, the RHNA Methodology is using growth goals contained in Plan Bay Area 2050 that are projected over a 30-year time horizon, so to apply these long-term growth "targets" as the basis for the next eight-year RHNA allocation methodology is fundamentally flawed and sets up growth expectations that are impossible to achieve. There have also been serious questions raised about the underlying data that was used to develop the growth projections in Plan Bay Area 2050 and the model that was used to distribute that growth. Beyond the aggressive growth assumptions and lack of consideration of how the pandemic will change the region's long-term growth, the distribution model does not appear to include an appropriate level of consideration to growth constraints such as infrastructure capacity, wildfire risk, and preservation of open space. Thus, in addition to pausing the RHNA process so that the impacts of the pandemic can be accounted for, we would strongly encourage you to reconsider the data that is being used to underpin the RHNA Methodology.

26379 Fremont Road  
Los Altos Hills  
California 94022  
650 / 941 - 7222  
Fax 650/941-3160

Honorable Jesse Arreguin  
ABAG Executive Board  
November 20, 2020  
Page Two

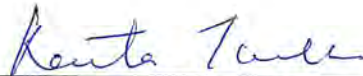
The RHNA Methodology as currently proposed will result in communities around the Bay Area, and particularly in Santa Clara County, being forced to develop new housing at levels not seen since the post-war housing boom of the 1950s and 1960s. Please take the time to develop a methodology that plans for more realistic goals and does not set growth requirements that are impossible to achieve.

Thank you for your consideration.

Sincerely,



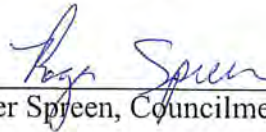
Michelle Wu, Mayor



Kavita Tankha, Vice Mayor



Courtenay C. Corrigan, Councilmember



Roger Spreen, Councilmember



George K. Tyson, Councilmember



Carl Cahill, City Manager

cc: Zach Dahl, Planning and Building Director



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November 13, 2020

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Mayor Jesse Arreguín, President  
Association of Bay Area Governments (ABAG) Board  
375 Beale Street, Suite 700  
San Francisco, CA 94105-2066  
Via email to [RHNA@bayareametro.gov](mailto:RHNA@bayareametro.gov)

Re: Proposed RHNA Methodology and Subregional Shares

Dear President Arreguín,

On behalf of the Marin County Board of Supervisors, thank you and the Housing Methodology Committee for the difficult work to ensure the Regional Housing Need Allocation is distributed in an equitable way that both seeks to provide opportunity to those in need of housing and ensures that our shared goals to put housing near services and jobs to address climate change are addressed.

We are committed to addressing housing as an issue of equity; where one lives matters a great deal to health and well-being. We recognize the role that housing policies, laws, and regulations can play in promoting neighborhood conditions that positively shape health and well-being. We are committed to providing affordable housing that provides residents the same chance to live in a safe neighborhood with great schools, healthy food options, public libraries, community centers, parks and trails, transportation hubs, and access to employment centers.

However, we are concerned that the proposed methodology adopted by the Housing Methodology Committee (HMC) and assumptions in the Blueprint 2050 will result in a significant increase in the Regional Housing Need Allocation (RHNA) in the unincorporated County that may make it impossible for us to meet these housing goals.

Marin County has a history of receiving State certification of its housing elements going back to 1970 and we wish to continue this practice. The County has adopted strong housing policy and taken a leadership role with coordinating with our cities and towns on housing. Some of our recent successes include:

- *Staffing the Housing Working Group* – In 2018, staff convened a countywide working group of planners to encourage interjurisdictional collaboration on housing issues and solutions, with a specific focus on responding to 2017 State housing Package. The working group established common goals and continues to coordinate on housing legislation, planning, production, and preservation of existing affordability.



- *SB 2 Grants* – The Housing Working Group jointly filed applications for three projects, including the Objective Design and Development Standards and ADU Workbook and Website in order to collaborate on a common strategy and save on costs and time for each participating jurisdiction.
- *Objective Design Standards* – Marin County jurisdictions hired a consultant to produce a general toolkit that will utilize existing zoning codes as a basis to produce objective standards and guidelines. This toolkit will be customized for each jurisdiction through chapters that outline architectural standards, building patterns, and historical significance.
- *ADU Workbook and Website* – The work includes updating the County website with code compliant floor plans, a calculator that estimates construction costs, homeowner spotlights, and a workbook.
- *Housing Trust Balance* – The Board has deposited over \$10 million in a local fund to be used for fund affordable housing.
- *Acquisition of the former Coast Guard Housing Facility* – after federal legislation required the land be sold to the County and years of negotiations with the Coast Guard, the County purchased the property to be developed as affordable housing.
- *Policies to prevent displacement of our existing lower income renters* – The Board of Supervisors has allocated resources and adopted policies, such as tenant protections and purchasing properties, to prevent displacement.

We understand that our share of the RHNA will increase and we are committed to increasing our housing production, especially of homes affordable to lower income households. However, the proposed methodology and assumptions could result in the unincorporated County receiving over 20 times more than the housing allocated to us in the previous cycle. With an increase of this magnitude, the County may not be able to adopt a compliant housing element unless we put housing in environmentally sensitive areas, prone to fires, flooding, and sea level rise.

Nearly half of the county's land base is protected by park or open space status. With the largest amount of public land in the nine-county Bay Area, Marin County's 118,669 acres of park and open space make up 30 percent of the County's land base, while water area and watershed lands comprise another 20 percent. Approximately 15% remains undeveloped.

- *Infrastructure* – Similar to other unincorporated counties, we lack the infrastructure to support densities of this level, especially because the increase is so magnified on such a short timeline. The goals, policies, and programs contained in the County's General Plan (Countywide Plan or CWP) direct future growth towards the City-Centered Corridor and the existing urban service areas of unincorporated communities to ensure that biotic, agricultural, open space, and other resources would be protected. Policies and programs ensure new development would be confined to areas where adequate public services are available and

coordinate the provision, timing, and funding of public services such that new growth would be appropriate to the specific area and constrained by available services such as water supply and wastewater treatment. Analysis of the Countywide Plan has demonstrated that although development is possible in the City-Centered Corridor, the development of units as required by the proposed RHNA numbers is not realistic in this area due to limited infrastructure and policies in the Countywide Plan to address sensitive habitat, high risk of wildfire, flooding, and sea level rise.

- *Wildfire Hazards* – In light of recent fire events, it is important to address fire hazards. Many unincorporated communities are considered “Communities at Risk” by the National Fire Plan because of the proximity of housing to areas susceptible to wildland fires. The California Department of forestry rates portions of Marin County either as a high, very high, or extreme fire hazard. Many of the high-risk areas are interspersed with developed areas. In addition, many of the roads to access these areas are private, narrow and substandard. New land uses and development could expose people and structures to wildland fires throughout the county, especially in areas with steep slopes, high fuel loads (i.e., dense vegetation) or inadequate emergency access.
- *Flooding and Sea Level Rise* – To address risks of flooding, the CWP requires all improvements in Bayfront, Floodplain, Tidelands, and Coastal High Hazard Zones to be designed to be more resistant to damage from flooding, tsunamis, seiches, and related water-borne debris, and to be located so that buildings and features such as docks, decking, floats, and vessels would be more resistant to damage. While the CWP does not prohibit development impacted by flooding, these are real limitations which will continue to increase as we face climate change. Calculations estimate sea level rises ranging anywhere from approximately 1-3 feet or 8.5-35.2 inches by the end of the Century, further limiting our development opportunities.

One of ABAG’s core strategies is “focused growth in communities along existing transportation networks near homes and jobs... This strategy aims to minimize development in our green fields and maximize growth in transit-rich communities, which will help lower vehicle miles traveled and greenhouse gases.” The proposed RHNA numbers in unincorporated Marin County contradict those policies as the County would be forced to develop in green fields and areas outside of transit networks, existing residential development, and job centers.<sup>1</sup>

We would like to reiterate that we understand that RHNA is increasing and the County will be expected to do more than in the past. However, we respectfully request that you consider a methodology that will not focus growth in unincorporated areas with few services and more environmentally sensitive areas. Unincorporated areas have fewer services, infrastructure and jobs. To better reflect the realities of the constraints of unincorporated communities, we

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<sup>1</sup> <https://abag.ca.gov/our-work/land-use/pda-priority-development-areas>

would like to endorse recommendations, such as from the Contra Costa Mayors Conference, that the **Plan Bay Area 2050 Growth** baseline be utilized, leaving the HMC-recommended factors in place.

Thank you for the opportunity to comment.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'Katie Rice', written in a cursive style.

Katie Rice, President  
Marin County Board of Supervisors

Cc: Marin County Board of Supervisors

Sashi McEntee  
Mayor  
John McCauley  
Vice Mayor  
Jim Wickham  
Councilmember



Urban Carmel  
Councilmember  
Tricia Ossa  
Councilmember  
Alan E. Piombo, Jr.  
City Manager

November 6, 2020

Mayor Jesse Arreguin, President  
Association of Bay Area Governments, Executive Board  
375 Beale Street, Suite 700  
San Francisco, CA 94105-2066

**RE: DRAFT RHNA METHODOLOGY**

Dear Board President Arreguin:

On behalf of the City of Mill Valley, please find herewith our comments related to the proposed Regional Housing Needs Allocation (RHNA) methodology recommended by the RHNA Housing Methodology Committee (HMC). We ask that these comments be considered in advance of the November 12, 2020 Regional Planning Committee Public Hearing where the recommended methodology will be discussed.

The City of Mill Valley appreciates the efforts and dedication of the diverse stakeholder group of HMC members over the last year in attempting to make a collective recommendation regarding the distribution of 441,000 new housing units within the region, and understands the urgency and challenge of addressing regional policy goals related to housing affordability, climate change and equity in this RHNA cycle.

However, the methodology recommended by the HMC allocates new housing units to areas that lack adequate transportation infrastructure, away from existing and future job centers, and into areas at risk of wildfire and sea level rise. As a result, the recommended methodology and resulting RHNA will threaten our region's ability to grow safely and sustainably into the future. The recommended methodology continues to promote auto dependency and long commute times, exacerbates a significant jobs/housing imbalance and results in numbers for areas like ours that are entirely unrealistic.

The City of Mill Valley is committed to increasing our housing production, especially of homes affordable to lower income households. But the methodology recommended by the HMC allocates far too many units to suburban areas far from job centers that lack adequate transportation infrastructure and are in areas at risk of wildfire and sea level rise. The proposed methodology will not further greenhouse gas reduction goals and is inconsistent with the growth patterns and policy objectives more carefully considered in the *Plan Bay Area 2050 Blueprint*.

**Household Growth.** We recommend the Executive Board follow ABAG staff's July 2020 suggestion to use the Draft Blueprint in the RHNA methodology by using each jurisdiction's share of Household Growth from 2010 to 2050 as the baseline, and based on guidance received from the Contra Costa County Mayors Conference dated October 2, 2020. We support the Household Growth baseline as it results in allocations that reflect jurisdictions with significant jobs that area experiencing growth, including communities that have elected to be Priority Development Areas. "This approach is consistent with how long-range forecasts have been used in ABAG's methodologies for previous RHNA cycles" (July 9, 2020 HMC Meeting #8, Item 6a, Attachment A, Page 3).

In addition, the State Housing and Community Development Department (HCD) has already approved using regional plan household growth as a baseline for 4 of the 8 approved 6<sup>th</sup> Cycle RHNA methodologies (with 3 others using baselines that factor in jobs, and one using a variety of factors). For example, Mill Valley is forecasted to grow by 1,000 households during the 30-year Plan Bay Area 2050 but is assigned 830 units for the first eight years of the Plan period alone.

On a regional scale, the Household baseline fails to proportionally assign units to larger jurisdictions that are experiencing growth in both jobs and housing. For example, San Jose is allocated fewer units than San Francisco even though Plan Bay Area forecasts that San Jose will create a half million jobs and San Francisco 182,000 jobs by 2050. However, using a baseline Household Growth increases the units for San Jose above San Francisco in an amount that is equal to 1/3 of its forecasted household growth in the next 30 years.

Small jurisdictions are being set up for failure under the proposed methodology. Mill Valley's proposed RHNA is *more than twice* our current RHNA. Our proposed RHNA of 830 units for the next eight years is *more than the total number* of units we have been allocated over the last three cycles (23 years of RHNA allocations; see table below). Based on our housing production since 1999, it would take 30 years to create the housing proposed under the current RHNA. This is entirely unrealistic.

| RHNA Cycle   | Units Allocated to Mill Valley |
|--|--------------------------------|
| 3 <sup>rd</sup> :1999-2006                                       | 225                            |
| 4 <sup>th</sup> :2007-2014                                       | 129                            |
| 5 <sup>th</sup> : 2015-2022                                      | 292                            |
| Subtotal RHNA Cycles 3 <sup>rd</sup> -5 <sup>th</sup> (23 years) | 646                            |
| 6 <sup>th</sup> : 2023-2030 / Proposed HMC Methodology           | 830                            |

**Roadway Access, Fire Hazard Areas and FEMA Floodway Areas.** Moreover, protecting Bay Area citizens from hazardous conditions, such as fire danger, must be included in the RHNA criteria. ABAG should collect more information and factor topographical constraints of the region, FEMA and high fire severity zones in the RHNA Methodology in order to accurately address development constraints.

Emergency access and fire safety are of paramount concern for residents living along hillsides in communities like ours. Of the 6,539 parcels in Mill Valley, approximately 60% (3,865) are located in the Wildland Urban Interface and 33% (2,183) are located in the Very High Fire Severity Zone. These areas also represent largely sloped areas with roadways less than 20' wide. These lots are developed parcels zoned as Single-Family-- rightfully so, as they pose little opportunity for any other type of development due to limited access. Another 306 parcels are in the FEMA Floodway where the building footprint cannot be expanded.

These local site conditions have to be recognized as part of the process. *Almost 65% of the City's parcels which are already developed are in a high fire zone with limited access or FEMA Floodway that prohibits changes to an existing parcel's footprint.* There needs to be a better understanding of these local site conditions and acknowledgement that there is little opportunity for growth and development in these areas. Mill Valley like other similar limited access coastal communities settled in challenging terrain and simply lacks the capacity to physically accommodate anything remotely close to the housing units under the proposed housing methodology.

**COVID and Changing Conditions.** Finally, the housing allocation methodology must factor changing conditions—the economy, housing market and working conditions based on COVID. The region’s commercial and business zones are not what they once were due changes in consumerism/retail (pre-COVID) as well as new economic conditions and increasing prevalence of working remotely from home. Remote work from home is becoming a new business model that should be further explored. Former commercial and business zones provide new housing opportunities through mixed use development, or conversion of existing office buildings into housing units. The vacancy rate of commercial buildings in the region should be documented to help identify such potential. Conversion of office space could potentially provide the same housing opportunities that have come about through the State’s Accessory Dwelling Unit program.

We acknowledge the work of the Committee and the importance of addressing the current and future housing needs of the Bay Area. The City of Mill Valley continues to do its part through the implementation of various programs contained in its Housing Element and has successfully worked to meet its regional housing goals in the past three cycles. Most recently, the City launched a home sharing program. While these programs and new housing starts may not necessarily be documented in the “RHNA” process, the City recognizes the potential opportunity to provide additional housing within the existing built environment.

In summary, ABAG must provide overall policy guidance to address Bay Area housing needs that acknowledge local topographical conditions such as FEMA Floodway and Fire Severity Zones, that prioritize areas with adequate transportation infrastructure and are in or near existing and future job centers.

Sincerely,



Sashi McEntee  
Mayor of Mill Valley

Cc:  
Mill Valley City Council  
Planning and Building Director Kelly  
File





A Tradition of Stewardship  
A Commitment to Service



November 10, 2020

Jesse Arreguin, President  
Association of Bay Area Governments (ABAG)  
Bay Area Metro Center  
375 Beale Street Suite 800  
San Francisco, CA 94105

Dear President Arreguin:

The City and County of Napa would like to express its appreciation to ABAG's Housing Methodology Committee (HMC) and offer some comments on the recommended Regional Housing Needs Allocation (RHNA) methodology. Our comments are not intended to detract from the work of the HMC, which -- as those of us who served can attest -- worked long and hard to establish a proposed methodology for the upcoming RHNA cycle (2023-2031). We also want to recognize the work of ABAG staff, and the tremendous challenge posed by the need to find an equitable distribution of the 441,176 housing units assigned to the Bay Area for the next RHNA cycle (2023-2031).

At its final meeting on September 18th, the HMC voted 27 to 4 to recommend "Option 8A: High Opportunity Areas Emphasis & Job Proximity" as the proposed methodology. We understand that this methodology was subsequently recommended by the Regional Planning Committee and the ABAG Executive Board. Option 8A included use of Year 2050 households from the Plan Bay Area 2050 Blueprint as the baseline allocation, and what is referred to as "the Bottom-Up" approach to income allocation, in addition to factors related to High Opportunity Areas and Job Proximity. Specifically, the Option 8A RHNA methodology can be summarized as follows:

1. Baseline allocation: 2050 Households (Blueprint)
2. Income allocation approach: Bottom-Up
3. Factors and weights: Option 8A: High Opportunity Areas Emphasis & Job Proximity

| <u>Very Low and Low</u>                | <u>Moderate and Above Moderate</u>     |
|--|--|
| ▪ 70% Access to High Opportunity Areas | ▪ 40% Access to High Opportunity Areas |
| ▪ 15% Job Proximity – Auto             | ▪ 60% Job Proximity – Auto             |
| ▪ 15% Job Proximity - Transit          |  |



This approach utilizes what was presented as a 'middle road' baseline of "Plan Bay Area 2050 Future Households" and a weighting of factors that prioritizes "Access to High Opportunity Areas."

This methodology could do more to support region-wide efforts to reach a jobs/housing balance by incorporating an alternate baseline and by modifying its focus on High Opportunity Areas. Specifically, we support questions posed by the Contra Costa County Mayors Conference regarding the selected baseline, and do not believe the HMC was given adequate information to evaluate the difference between the use of Plan Bay Area 2050 *Future Households* and Plan Bay Area *Future Growth*. Also, we do not believe that the HMC was adequately informed regarding the definition (and location) of High Opportunities Areas or the consequences of the recommended methodology's emphasis on High Opportunity Areas, including the following:

- A. The definition of High Opportunity Areas is based on limited data in the form of income and census information that often does not follow jurisdictional lines or established communities.
- B. By focusing on High Opportunity Areas, there has been a greater emphasis on using RHNA as means for establishing social equity than for a balanced and sound land use plan as required by SB 375 and the objectives of Government Code Section 65584(d) which include protecting environmental and agricultural resources and encouraging efficient development patterns.
- C. Placing homes near job centers and away from natural hazards (fire severity zones, sea level rise, etc.), and preserving agricultural and open space areas have all been given lower priority than placing homes in High Opportunity Areas. The result is a methodology that will unintentionally result in a loss of farmland and open space, increase the need for mitigation and assistance in the case of emergencies, result in greater greenhouse gas emissions, and place greater strains on our regional transportation system.

Napa County has faced extraordinary challenges this year and lost a significant number of houses due to wildfire in 2017 and 2020. We want to ensure the RHNA does not disproportionately impact rural communities like ours that are experiencing more frequent natural hazards, that provide the region's agricultural and open space areas, and that have limited infrastructure outside of incorporated communities. Loss of units due to these wildfires, lands in agricultural preservation under state or federal programs or per local ballot measures must be considered in developing the methodology (See Government Code Section 65584(e)).

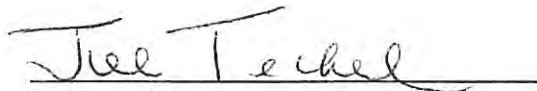
Fine tuning the methodology to address these issues could include changes to the baseline, adjustments to how lands within Spheres of Influence are accounted for, adjustments to the definition of High Opportunity Areas, and post-allocation adjustments for rural communities impacted by natural hazards. We would be happy to work with you and your staff on any of these ideas.

Please don't hesitate to reach out to us, or to our planning directors, David Morrison at [david.morrison@countyofnapa.org](mailto:david.morrison@countyofnapa.org) and Vin Smith at [ysmith@cityofnapa.org](mailto:ysmith@cityofnapa.org), if we can answer any questions. This is important work, and we look forward to our continued discussion!

Sincerely,

A handwritten signature in blue ink, appearing to read "Diane Dillon", written over a horizontal line.

Diane Dillon, Chair  
Napa County Board of Supervisors

A handwritten signature in blue ink, appearing to read "Jill Techel", written over a horizontal line.

Jill Techel, Mayor  
City of Napa



**CITY OF NOVATO**  
**CALIFORNIA**

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Mayor  
Denise Athas  
Mayor Pro Tem  
Pat Eklund  
Councilmembers  
Eric Lucan  
Amy Peele  
Susan Wernick

City Manager  
Adam McGill

November 18, 2020

Mayor Jesse Arreguin, President  
Association of Bay Area Governments, Executive Board  
375 Beale Street, Suite 700  
San Francisco, CA 94105-2066

RE: Proposed RHNA Methodology and Subregional Shares

Dear Board President Arreguin:

On behalf of the City Council of the City of Novato, please accept this letter of comment to the proposed 6th Cycle Regional Housing Needs Allocation (RHNA) methodology recommended by the Housing Methodology Committee (HMC) and subject of the November 12, 2020 public hearing before the Regional Planning Committee. We request these comments be read and considered in advance of the Executive Board's approval of a draft allocation methodology submission to the Department of Housing and Community Development (HCD) in January 2021.

The City of Novato appreciates the dedication of the various appointed officials, staff members and volunteers in developing a variety of methodologies and factors for consideration. We also appreciate the innumerable efforts to achieve consensus on an appropriate distribution of 441,000 new housing units. The responsibility was especially daunting given the array of competing issues, including housing supply and affordability, regional equity, climate change and transportation infrastructure and funding.

As a city located in one of the region's smaller and less urbanized counties, however, we are compelled to point out aspects of the resulting housing numbers which we believe are counter to the overall goals of Plan Bay Area, even if the inconsistencies are presumed to be a temporary step toward future consistency.

Plan Bay Area is a smart, well-formulated and sensible growth strategy for our region. We look to PBA 2040 for developing our own long range land use and transportation planning. We have been implementing those plans to the best of our ability by planning for and streamlining affordable housing development, by utilizing limited City funds to support development of housing for our area's lower income and homeless families and by advocating for the development of a third SMART station to provide forward-looking public transportation alternatives for our residents and visitors. The proposed methodology, however, allocates growth in ways that counter the strategies of PBA and sets us up for failure. It promotes auto dependency and long commute times, exacerbates a significant regional jobs/housing imbalance and results in numbers that are wholly unrealistic and not anticipated in our long range planning. This last point is especially critical for our ability to provide services to these future residents.

After several long years of technical work and community participation, just last month, this Council adopted Novato General Plan 2035. GP 2035 relied upon growth estimates from PBA 2040. Those estimates were consistent with past rates of growth and development activity. Our physical infrastructure (streets, water, sewer, storm drains) and our administrative

infrastructure (revenue projections, budgets and staffing) are all based on those same assumptions.

GP 2035 has a total future buildout of 930 housing units. The proposed RHNA methodology would result in a 2023-2031 Novato allocation of 2,107 housing units. This is more than a 125% increase in housing units and it is expected to be built in half the time. You can readily see why we anticipate we will be unsuccessful in achieving the housing or being able to provide the units with needed services. Dramatic increases in infrastructure capacity can be reliably achieved in only two ways – agency funded capital projects, or development impact fees. Increases in fees will simply lead to increases in the cost of developing housing and the same cycle of increasing costs and lack of production will continue. Without similar rates of growth in revenues, we will be unable to pay for needed capital projects or staffing to assist with permitting, streets maintenance, utility services, public safety services, business licenses, recreation services, etc. We believe the proposed HMC methodology accelerates housing development too quickly in areas with insufficient infrastructure. We simply do not have the resources to escalate our infrastructure at that same rate. The methodology takes the region off the strategic path identified by PBA and utilized by local governments, in good faith, to do our own realistic and sustainable long range planning.

Novato has a long history of providing affordable housing in our County. We have an inventory of nearly 2,200 below market rate, deed restricted housing units in our City. That number is more than 10% of our entire housing stock. In the past twenty years, nearly 50% of all new residential construction has been affordable housing. We are currently on track to achieve 88% of our 5<sup>th</sup> Cycle *very low income* units. We understand and support housing equity and believe strongly in the same goals of equity furthered by the recommended methodology. In addition, however, we want to continue implementing a smart and strategic plan for growth.

We recommend the Executive Board take ABAG staff's July 2020 suggestion to incorporate the *Draft Blueprint* in the RHNA methodology by using each jurisdiction's share of **Household Growth** from 2010 to 2050 as the baseline. The **Household Growth** baseline results in higher allocations for jurisdictions with significant jobs that are experiencing growth, including communities that have elected to be Priority Development Areas. ABAG staff stated in their July 9, 2020 meeting materials that this approach is consistent with how long-range forecasts have been used in past methodology development. The advantages of this baseline were summarized by ABAG staff this way (July 9, 2020, HMC Meeting #8, Item 6a, Attachment A, Page 3):

- Simple and straightforward to implement and discuss (e.g., “the methodology aligns with growth predicted by Plan Bay Area 2050”)
- Integrates transit, hazards, and market feasibility through strategies and modeling
- Better aligned with Plan Bay Area 2050
- Emphasis on current and future employment development patterns leads to RHNA allocations more focused in Silicon Valley, region's largest job center
- Higher RHNA allocations in high resource areas near major job centers – notably in the South Bay

Finally, we want to emphasize several important factors considered in the development of GP 2035 related to climate change. It is now clearly understood that we are on track to experience prolonged high heat days and intensified winter rainfall. These conditions will result in increased threat of wildfire, flooding and sea level rise and create concern for us in our location and situation. Marin County's topography has resulted in patterns of small development pockets surrounded by vegetated hillsides and ridges, often with limited points of access and evacuation routes. Runoff down these steep slopes results in numerous creeks and drainages. These features make the County a beautiful and desirable place to live but climate change has shown us that they can also be dangerous places to develop. Most of these areas are entirely unsuited for increased intensity, yet the extremely high numbers resulting from the methodology will lead to pressure to develop in these and other hazardous areas. We have enclosed fire hazard mapping to illustrate our points. The vast majority of

our city is surrounded by high or very high risk of fire and we are completely enclosed by either the Wildland-Urban Interface or areas subject to sea level rise.

In view of these potential hazards, the City requests that ABAG add to the *2050 Plan Bay Area Blueprint* Wildland-Urban Interface Fire Threat areas for the San Francisco Bay Region, which are available in the Metropolitan Transportation Commission Map Gallery. Currently, only CAL FIRE Very High Severity zones are factored into the Plan, which do not adequately represent wildfire risk. In addition, we request that FEMA flood maps be used to more accurately depict flooding hazards along our creeks and waterways. These data sets will more accurately reflect the true constraints we have in achieving the numbers and pace of housing development as well as necessary infrastructure support. These are not included as hyperbole, but rather, the scientific facts we incorporated into our long range planning for growth. We understand the HMC majority opinion that RHNA may not be the appropriate tool for evaluating risk. The logic is that cities can rezone for higher density in non-hazardous areas. Housing development over the past 10 years in our market has proven that to be an inaccurate precept and we respectfully disagree. Developers want to build less dense housing in this market, and despite numerous incentives, they consistently opt for townhome densities in the 18-22 du/acre range. Rezoning for a development type that will not materialize does not further the goal of increasing housing production and will simply drive land prices up even higher.

We respectfully request that the Board choose an alternative utilizing Household Growth as the baseline for an allocation methodology and incorporate the natural hazards data described above. This combination will result in realistic numbers that are achievable and keep us on the smart and strategic path established by Plan Bay Area. Thank you again for all of your hard work. We appreciate your consideration of our comments.

Respectfully,

A handwritten signature in black ink that reads "Denise Athas". The script is cursive and fluid, with the first name and last name clearly distinguishable.

Denise Athas  
Mayor

cc: [RHNA@bayareametro.gov](mailto:RHNA@bayareametro.gov)  
Judy Arnold, Supervisor District #5, County of Marin

Attachments:

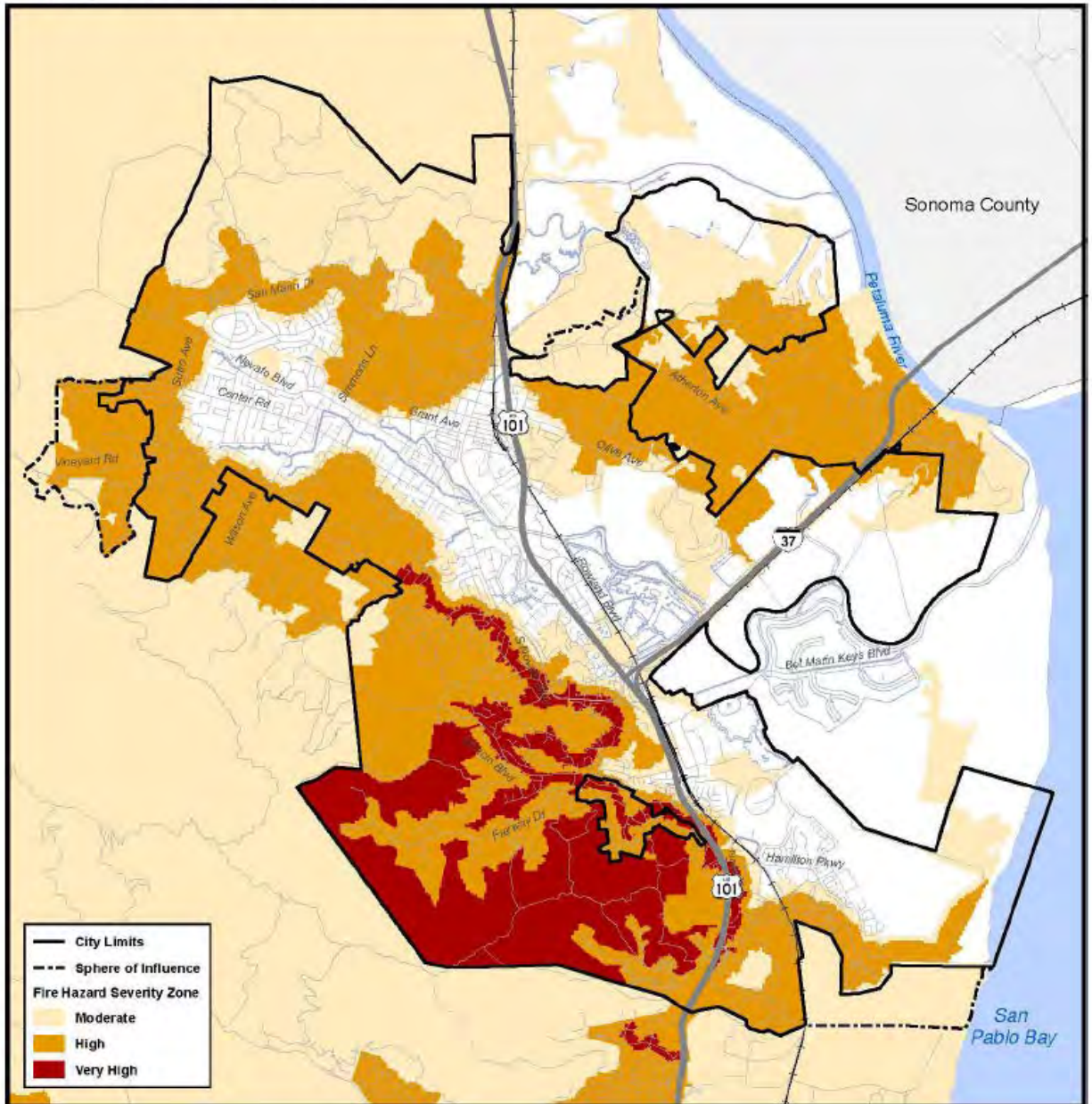
1. Novato Fire Hazard Severity zones
2. Novato Wildland Urban Interface zones



## NOVATO GENERAL PLAN 2035 (EXCERPT)

FIGURE CW-4 FIRE HAZARD SEVERITY ZONES

FIGURE CW-4 FIRE HAZARD SEVERITY ZONES

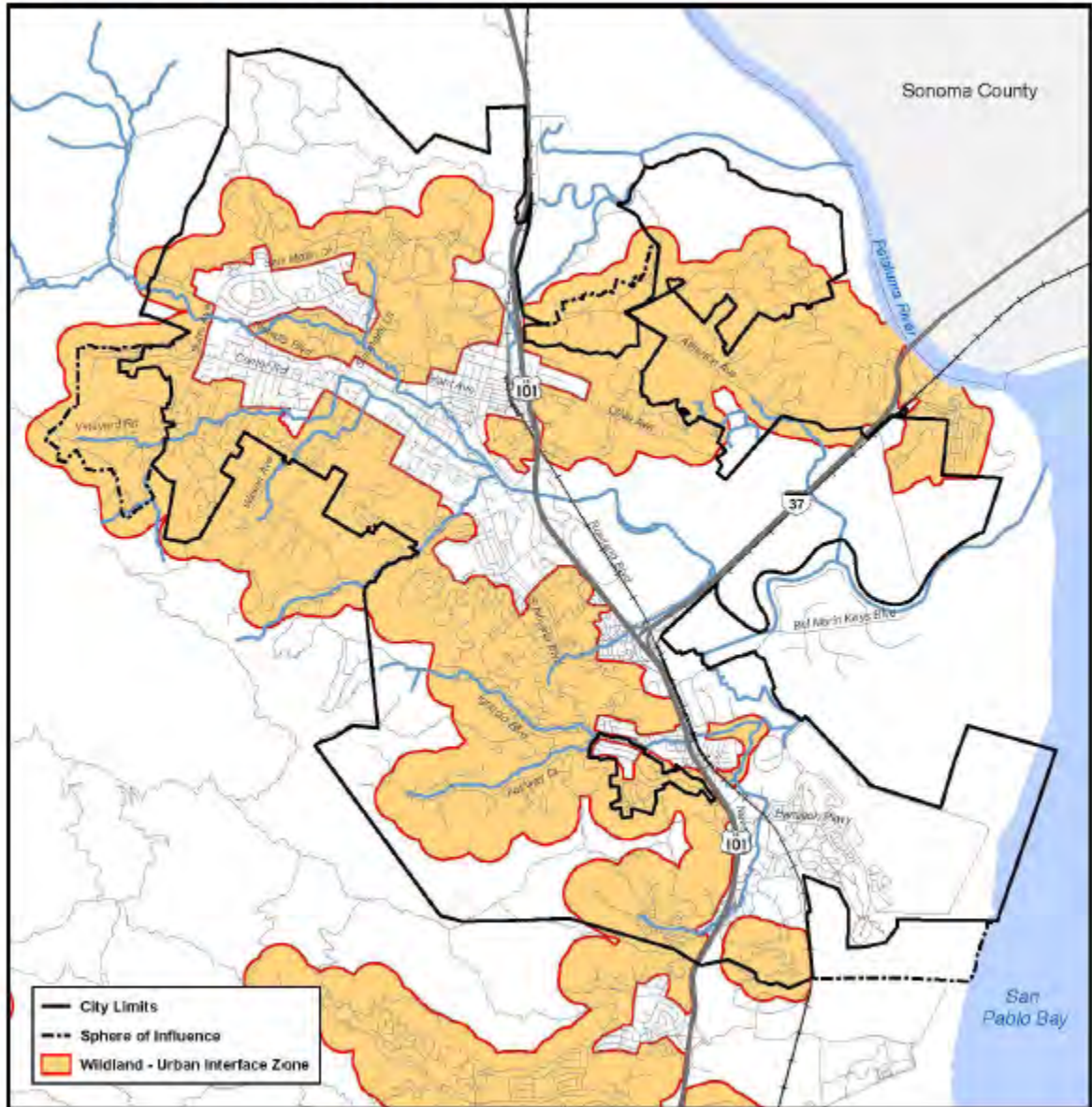


Source: MarinMap, 2016

## NOVATO GENERAL PLAN 2035 (EXCERPT)

### FIGURE CW-5 WILDLAND URBAN INTERFACE ZONE

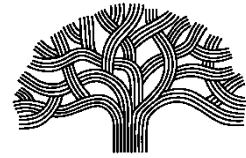
FIGURE CW-5 WILDLAND URBAN INTERFACE ZONE



Source: MarinMap, 2016



# CITY OF OAKLAND



1 FRANK H. OGAWA PLAZA • 3<sup>RD</sup> FLOOR • OAKLAND, CALIFORNIA 94612

Office of the Mayor  
Libby Schaaf  
Mayor

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## ***VIA ELECTRONIC MAIL***

November 19, 2020

Mayor Jesse Arreguin, President  
Executive Board, Association of Bay Area Governments  
375 Beale Street, Suite 800  
San Francisco, CA 94105  
rhna@baymetro.gov

**RE: Regional Housing Needs Allocation Proposed Methodology, 2023-2031 –  
Support for the Proposed Methodology (Option 8A using the Plan Bay Area  
2050 Households Baseline)**

Dear Mayor Arreguin and ABAG Executive Board:

Thank you for the opportunity to comment on the proposed methodology for the Bay Area's Regional Housing Needs Allocation (RHNA) process for the 2023-2031 cycle. The region's housing crisis continues and the RHNA process is a critical element in ensuring that all jurisdictions in the Bay Area are in a position to help solve this crisis.

**I strongly encourage you to support the current proposed RHNA methodology – Option 8a using the Plan Bay Area 2050 Households Baseline.** The current proposed methodology will help address global climate change and systemic racism by reducing greenhouse gases and affirmatively furthering fair housing. The proposed methodology is the best available option for the following reasons:

- **The proposed methodology addresses the region's housing and climate crises by promoting infill development near jobs and transit and by providing access to high opportunity areas.** It is consistent with the Draft Blueprint for growth in Plan Bay Area 2050 and allocates close to 40 percent of the housing growth to the three big cities – Oakland, San Francisco and San Jose – while meeting RHNA's statutory objective to affirmatively further fair housing.
- **The Housing Methodology Committee (HMC) process was thorough and fair.** The HMC was a diverse group of stakeholders comprised of local elected

officials, local jurisdiction staff and representatives from local and regional advocacy organizations. It spent a year analyzing this highly technical and complex issue.

- **The proposed methodology reflects a compromise.** Some HMC members voted to place a greater emphasis on access to high opportunity areas and some members voted to place a greater emphasis on proximity to jobs and transit. There is no single solution that will please every jurisdiction in the region. The proposed methodology strikes a delicate balance.
- **New alternatives weren't analyzed by the HMC.** I am concerned about the ABAG Executive Board exploring new methodology alternatives that weren't vetted by the HMC. We're running out of time. Consideration of new alternatives could delay the RHNA process. Jurisdictions need as much time as possible to update their Housing Element which will be more challenging this cycle due to the much higher number of housing units allocated to the region by the State.

I strongly urge you to **reject alternatives, such as changing the baseline to Plan Bay Area 2050 Growth, that perform worse on the statutory objectives' performance metrics.** Alternative proposals that use Plan Bay Area 2050 Growth as the baseline, for example, fail to meet the statutory objective to affirmatively further fair housing and perform worse than the current proposed methodology on almost all other metrics. While this alternative may appeal to some jurisdictions who will see their allocation decrease, it shifts housing units to other jurisdictions, upsetting the delicate balance found in the current proposal.

If any further adjustments to the methodology are made, they should instead perform holistically better on the metrics and objectives. One such adjustment is the **Equity Adjustment**, which improves the methodology's performance on the affirmatively furthering fair housing objective. The Equity Adjustment ensures that racially and/or economically exclusive jurisdictions receive a fair and proportional share of very low- and low-income allocations.

Thank you again for this opportunity. I deeply appreciate your work on the RHNA process and believe that the current proposed methodology is the best available option to address our climate and housing crises while addressing racial inequities in our region.

Sincerely,



Libby Schaaf  
Mayor of Oakland

Cc: Ed Reiskin, City Administrator  
Shola Olatoye, Director of Housing and Community Development  
William Gilchrist, Director of Planning and Building



Scenic Pacifica  
Incorporated Nov. 22, 1957

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## CITY OF PACIFICA

170 Santa Maria Avenue • Pacifica, California 94044-2506  
[www.cityofpacifica.org](http://www.cityofpacifica.org)

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**MAYOR**  
Deirdre Martin

**MAYOR PRO TEM**  
Sue Beckmeyer

**COUNCIL**  
Sue Vaterlaus  
Mike O'Neill  
Mary Bier

November 24, 2020

Mayor Jesse Arreguin, President  
Executive Board, Association of Bay Area Governments  
375 Beale Street, Suite 700  
San Francisco, CA 94105

RE: Comments on the Proposed Methodology for the 6<sup>th</sup> Cycle Regional Housing Need Allocation

Dear Chair Arreguin,

On behalf of the City of Pacifica (City), please accept our comments on the proposed Regional Housing Needs Allocation (RHNA) methodology. The proposed methodology would result in a 367% increase (1,933 units) in unit allocation from RHNA 5.

The City appreciates the efforts and dedication of the diverse stakeholder group of Housing Methodology Committee (HMC) members and the inclusion of equity factors in the draft 6<sup>th</sup> Cycle RHNA methodology. Pacifica understands the urgency and challenge of addressing regional policy goals related to housing affordability, climate change and equity in this RHNA cycle. However what the HMC and Executive Board may not realize, is the incorporated area in Pacifica is 47% preserved open space with much of this land owned by other agencies such as the Federal Government (Golden Gate National Recreation Area). Pacifica is also partially in the Coastal Zone (15% of incorporated area). As a result, the City of Pacifica has no or limited land use authority over 67% of the City's incorporated acreage and finding adequate sites to accommodate the unit allocation that would result from the proposed methodology will be extremely difficult. The draft methodology also allocates new housing units to jurisdictions, like Pacifica, that lack adequate transportation infrastructure; are subject to hazards such as wildfires; and have other significant development constraints, such as coastal erosion.

The draft methodology and resulting RHNA, will not only fail to meet the Bay Area's total regional housing need, but will threaten our region's ability to grow sustainably into the

future. The result of the draft methodology is to push a greater proportion of new development into areas that will promote auto dependency and longer commute times, exacerbate GHG impacts, and run counter to the goals and objectives of the recently released Plan Bay Area Blueprint. To avoid these outcomes, we recommend consideration of the following changes to the recommended methodology:

- Utilize Plan Bay Area 2050 household *growth* rates between 2019 and 2050 as the baseline for the RHNA allocation rather than Plan Bay Area future households in 2050. Using the Plan Bay Area 2050 *Growth* baseline will encourage housing development in proximity to job centers, reduce transportation congestion, and reduce greenhouse gas emissions, consistent with both AB 32 and SB 375.
- Leave the HMC factors, including equity factors, in place.

By modifying only the baseline factor, the suggested modifications will continue to be consistent with RHNA statutory objectives to:

1. Increasing the housing supply and mix of housing types, tenure, and affordability;
2. Promote infill development and socioeconomic equity, protecting environmental and agricultural resources, and encouraging efficient development patterns;
3. Promoting an improved intraregional relationship between jobs and housing;
4. Balancing disproportionate household income distributions; and
5. Affirmatively furthering fair housing

Again, Pacifica recognizes the challenge that the HMC faced in developing an appropriate allocation methodology and we appreciate your consideration of our recommendation and perspectives.

Sincerely,



Deirdre Martin  
Mayor

cc: City Council  
Planning Commission

**City of Palo Alto**  
*Office of the Mayor and City Council*

Date: November 18, 2020

ABAG Executive Board Members

ABAG-MTC Public Information Office Staff

Submitted Via Email To: [info@bayareametro.gov](mailto:info@bayareametro.gov) and [RHNA@bayareametro.gov](mailto:RHNA@bayareametro.gov)

**RE: Proposed RHNA Methodology and Subregional Shares**

Dear ABAG Executive Board Members,

Thank you for the opportunity to provide comments on the proposed RHNA methodology. We believe that the proposed RHNA methodology (Option 8A), without modifications, will result in a significant number of jurisdictions appealing both their own and others' draft RHNA allocations in Summer 2021.

The City believes that many regional tensions in the RHNA process can be relieved by ABAG updating the recommended RHNA methodology. We have organized our primary concerns into the three general areas: policy, procedure, and data.

ABAG and MTC staff need more time to analyze the comments received and prepare adjusted RHNA methodology options for RPC and Executive Board consideration in December 2020 and January 2021. ABAG and MTC staff also need more time to analyze and describe any shift in baseline-related outcomes for the recommended RHNA methodology resulting from incorporation of the Plan Bay Area 2050 Final Blueprint modeling results, given that comments received to date reflect considerations resulting from the Draft Blueprint modeling.

Policy Areas of Concern

**2050 Baseline Allocation Inappropriate for Eight-Year RHNA Cycle.** The City believes that it is unreasonable to apply long range aspirational housing goals to the near term RHNA allocation process, especially with three more RHNA cycles within the 30-year time horizon of Plan Bay Area 2050. Achieving the visionary housing goals in Plan Bay Area 2050 currently relies on new funding sources, some of which require voter approval, political compromises, and infrastructure that has not yet been funded, approved, or built. However, use of the 2019 Existing Households baseline could be utilized with factors and weighting to 1) root the RHNA methodology in existing conditions as a starting point and 2) achieve the housing goals and be consistent with Plan Bay Area 2050.

**Methodology Should Include a Cap to Address Development Feasibility.** Under the anticipated draft RHNA allocations resulting from use of the Plan Bay Area 2050 Final Blueprint 2050 Households baseline, the City supports the application of a reasonable cap to limit how much housing a community is expected to build over the RHNA cycle. Housing units that exceed the cap should then be redistributed to other jurisdictions. This addresses fundamental development feasibility, especially under current recession circumstances. The concern is many jurisdictions potentially failing to meet their market rate housing targets, subsequently being subject to the permit streamlining requirements of SB 35, and then these jurisdictions losing control over local land use decisions four years into the RHNA cycle.

For Palo Alto and other Santa Clara County and San Mateo County jurisdictions, this anticipated RHNA allocation would result in the need to plan for a population growth equivalent to building a new small city in eight years within existing built-out jurisdictional boundaries. Staff estimates that Palo Alto's anticipated allocation would require the need for significant increases in municipal services, including more parkland, expanded public safety services, greater access to libraries and public schools and other services to accommodate a population growth that averages an estimated 3,000 new residents each year during the RHNA cycle. This is equivalent to a population increase of approximately 23,000 new residents or a 36% growth in the City's population. Development at this scale and pace is not realistic and not feasible for a built-out community. A growth cap is necessary to ensure jurisdictions can reasonably plan for and produce more housing units.

**Methodology Promotes Urban Sprawl in Unincorporated Areas.** Use of the Plan Bay Area 2050 Final Blueprint 2050 Households baseline results in the unintended consequence of assigning a significant number of new housing units to unincorporated County areas across the region. This could lead to urban sprawl across the region. Therefore, the City does not support the use of this baseline for the methodology.

As a possible remedy, ABAG and MTC staff suggested nearby Santa Clara County jurisdictions absorb portions of these county housing units or potentially annex currently unincorporated areas. For Santa Clara County and Palo Alto specifically, this approach requires legal review and is likely unworkable under existing agreements between Santa Clara County, Stanford University, and Palo Alto. Furthermore, the City previously requested that the RHNA methodology account for "town and gown" concerns generated by the adjacency of unincorporated Stanford University to nearby jurisdictions. The City already absorbs a significant amount of the housing demand generated by Stanford University land uses. In the past, through the RHNA appeal process, some of the City's units were transferred to the County to address this discrepancy. The adopted methodology should account for these adjacency issues and not compel jurisdictions to file an appeal in order to receive a fair share allocation of the regional housing need.

#### Procedural Areas of Concern

**COVID-19 Pandemic and Recession.** With the unanticipated intrusion of COVID-19 early this year and all that has come with this pandemic, the seriousness and depth of its implications to the overall RHNA process needs to be fully considered. It is important to understand how ABAG accounted for development feasibility for the current eight-year RHNA cycle under recession conditions. Additionally, it remains unclear when new funding sources described in Plan Bay Area 2050 for housing retention and production would arrive in this recession and if they would be in effect in time to assist jurisdictions meet the RHNA allocations for the current eight-year RHNA cycle.

More can be done in the RHNA methodology to account for current and future improvements in the existing jobs/housing imbalances in the region due to the current success of remote work and telecommuting. The fundamental location attribution for the jobs related RHNA methodology factors should be recalibrated for jurisdictions across the region. The pre-pandemic and pre-recession scoring used does not account for outmigration of jobs from the Bay Area and the anticipated increased levels of telecommuting in post-pandemic and post-recession conditions.

Data Areas of Concern (Mapping and Modeling)

**Regional Growth Strategies Mapping and Modeling Accuracy.** Mapping, modeling results, and associated assessments of development potential underlie the regional land use pattern in the Plan Bay Area 2050 Final Blueprint. Accuracy in the regional growth strategies mapping and modeling is fundamental if 2050 Households is used as the RHNA methodology baseline. Staff coordination with ABAG/MTC staff regarding the City's portion of the regional growth geographies mapping and modeling remains ongoing. Palo Alto may be assigned more growth and development potential than is appropriate. Interim maps still include some park and school areas, areas that are anticipated to experience lower or no transit service levels in the future, the local Veterans Administration area that is assigned over 1,000 housing units, and other areas of concern. Furthermore, interim modeling results identify some larger parcels with significant existing infrastructure and buildings as identified for future housing growth. Staff notes that these larger parcels are unlikely to redevelop in the next eight-year RHNA cycle and some are unlikely to redevelop in the next 30 years. Other Santa Clara County jurisdictions also have mapping accuracy concerns. It is difficult to have confidence in the use of the Plan Bay Area 2050 Final Blueprint 2050 Households baseline with these mapping and modeling concerns still outstanding.

Looking forward, the City requests that ABAG schedule release of staff reports or other key information sufficiently in advance of public hearings to allow jurisdiction staff to bring these items to their respective elected bodies and other local stakeholders. This request includes materials for the forthcoming ABAG Executive Board meeting and the forthcoming release of updated Plan Bay Area 2050 Final Blueprint modeling results.

Thank you for your continued consideration.

Adrian Fine, Mayor

DocuSigned by:  
  
289F2F8A691E446...  
CC:

Palo Alto City Council Members

Ed Shikada, City Manager, City of Palo Alto

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)





# CITY OF PIEDMONT CALIFORNIA

November 24, 2020

Public Information Office  
ASSOCIATION OF BAY AREA GOVERNMENTS  
METROPOLITAN TRANSPORTATION COMMISSION  
375 Beale Street Suite 800  
San Francisco, CA 94105

SUBJECT: Proposed RHNA Methodology and Sub-Regional Shares

Dear ABAG/MTC Colleagues:

Thank you for the opportunity to comment on the proposed Regional Housing Needs Allocation (RHNA) methodology. This letter supplements comments previously submitted by the City of Piedmont to the Housing Methodology Committee and the ABAG Executive Board. We continue to have concerns about the methodology and its outcomes, as well as the process for soliciting and responding to comments on the draft allocations.

This letter focuses on five specific points:

1. Insufficient data has been provided to demonstrate that the RHNA is consistent with the Plan Bay Area 2050 Draft Blueprint
2. The “2050 Household Baseline” is not an appropriate starting point for the allocations, and unintentionally directs growth to cities with physical capacity and natural hazard constraints
3. The proposed methodology has a disproportionate impact on smaller cities, many of which are not expected to generate significant employment during the planning period
4. The Draft RHNA numbers appear to be fundamentally inconsistent with State goals to reduce Vehicle Miles Traveled and greenhouse gas emissions, improve air and water quality, preserve agricultural land, and focus development away from areas with high wildfire risks
5. The Draft RHNA numbers do not appear to support equity goals, as they assign “above market rate” housing to affluent jurisdictions to a far greater extent than the last three RHNA cycles

Finally, our letter presents a revised approach to the RHNA that better reflects land capacity constraints and projected growth patterns, while still considering the direction provided by the Housing Methodology Committee. As appropriate, our letter references the October 2020 [RHNA Methodology Report](#) posted to the ABAG-MTC website.

In the pages below, we provide a discussion of our concerns.

**1. Insufficient data has been provided to demonstrate that the RHNA is consistent with the Plan Bay Area 2050 Draft Blueprint.**

SB 375 requires that the RHNA is consistent with the Sustainable Communities Strategy. In other words, consistency between the 2023-2031 RHNA and the Plan Bay Area 2050 Draft Blueprint (PBA 2050) is statutorily required. Page 13 of ABAG's RHNA methodology report concludes that the two documents are consistent based on the fact that the 8-year RHNAs do not exceed the 35-year (2015-2050) growth forecasts for sub-regions in the Bay Area.

This conclusion is flawed on two levels. First, the 35-year forecast period is more than four times the length of the 8-year RHNA time horizon. It is irrational to conclude that a RHNA can be deemed consistent with the SCS if it presumes a sub-regional growth rate that is four times higher than the forecast for that area.

Second, and more importantly, there is no way to evaluate consistency without jurisdiction-level forecasts for the region's 101 cities. Consistency at a sub-regional level is meaningless, as sub-regions do not have the authority to write, adopt, or implement Housing Elements. This responsibility rests with cities and counties alone. Sub-regions contain jurisdictions with vastly different populations, employment bases, geographies, hazard levels, and physical constraints. Lumping dissimilar cities together as sub-regions in PBA 2050, and then assigning growth at the city-level through the RHNA process, makes it impossible to determine consistency between the two processes.

We urge ABAG to publish jurisdiction-level forecasts for PBA 2050 so that consistency can be accurately and transparently determined. If the 2040 forecasts are used as a proxy, the RHNA appears grossly inconsistent with the forecasts for many jurisdictions, including our own.

In Piedmont's case, the Draft RHNA is approximately 600 units for an eight-year period. Based on our communication with ABAG, the PBA 2050 growth forecast for Piedmont is approximately 60 units. This means we are being asked to plan for ten times more housing in the next eight years than our community is expected to add in the next 30 years. This is not only inconsistent, it is illogical and not consistent with good planning practices.

Unfortunately, our ability to make a conclusive assessment of the discrepancy between RHNA and growth forecasts is hampered by the absence of any published data on PBA 2050 jurisdiction-level forecasts. We have requested this data several times but it has not been provided.

**2. The "2050 Household Baseline" is not an appropriate starting point for the allocations and unintentionally directs growth to cities with physical capacity and natural hazard constraints.**

As we have expressed in our prior letters to the Housing Methodology Committee and Executive Board, and as you have heard from dozens of other cities in the region (including all 18 cities in Contra Costa County and most cities in Alameda County), the use of a 2050 Households Baseline is fundamentally flawed. This baseline has been characterized as a "middle ground"

between two completely different methods. In fact, it is not a “middle ground”—it is merely a variation of the less logical of the two methods.

A true “middle ground” would be to use a weighted average that considers both the jurisdiction’s share of the region’s population in 2050 and its anticipated growth over the next 35 years. Instead, the baseline only considers what percentage of the region’s households will reside in each jurisdiction in 2050. This approach does not recognize land capacity constraints or the physical and economic realities of the region’s growth patterns—factors which are recognized by Blueprint 2050.

The result of the baseline selected by ABAG is that older residential communities, many of which have experienced slow growth over the last 50 years due to physical constraints are receiving disproportionately large allocations. We completely agree that these jurisdictions must grow and accommodate a larger share of the RHNA than they have in the past. However, the assignments should bear some relationship to the growth capacity of each city, as expressed by the Blueprint.

In Piedmont’s case, the city is 1.7 square miles and landlocked. The City’s vacant land supply consists of roughly 60 very steep single-family lots, many of which are served by substandard streets with inadequate emergency vehicle access. The entire city has been designated a Wildland Urban Interface zone. There are 3.4 acres of commercially-zoned land in the City, all of which is fully developed. Seventy percent of the City’s housing stock was built before 1940. The City’s only major employers are the School District and the City itself. Prior forecasts actually show employment in the City declining in the next 20 years.

Previous RHNAs for Piedmont appropriately recognized these constraints. The currently proposed RHNA does not. The proposed 600-unit allocation is 917 percent higher than the 2015-2023 allocation and bears no relationship to capacity constraints. Simply because a city has 1/1000<sup>th</sup> of the region’s population does not mean it should be assigned 1/1000<sup>th</sup> of the region’s RHNA. Yet, that is effectively what the baseline does.

**3. The proposed methodology has a disproportionate impact on smaller cities, many of which are not expected to generate significant employment during the planning period.**

Smaller cities appear to be disproportionately impacted by the methodology selected by ABAG. Many of these cities lack the infrastructure, services, and land to accommodate the number of units they are being assigned. Moreover, many of these cities are not job centers, nor are they expected to add significant numbers of jobs in the future.

There are currently 30 cities in the Bay Area with populations under 15,000. Piedmont is one of them. At least half of these 30 cities have RHNA numbers that are more than ten times larger than the 20-year household growth increment previously projected for these communities by Plan Bay Area 2040.<sup>1</sup> Most of these cities are also facing RHNA numbers that are many times larger than their prior allocations—in some cases up to 20 times higher.

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<sup>1</sup> Atherton, Brisbane, Half Moon Bay, Hillsborough, Portola Valley, Woodside, Los Altos Hills, Monte Sereno, Yountville, Belvedere, Corte Madera, Larkspur, Mill Valley, Ross, Sausalito, Tiburon, and Piedmont

By contrast, the region's largest cities and major job centers are receiving proportionally smaller increases in their RHNA's. It is counterintuitive that cities with the greatest capacity for growth, and the most ambitious plans to add jobs, are receiving RHNA's that are well below their 35-year growth forecasts while small cities with limited transit, infrastructure, and high natural hazards are receiving RHNA's ten to twenty times higher than they have seen in the past.

**4. The Draft RHNA numbers are fundamentally inconsistent with State goals to reduce Vehicle Miles Traveled and greenhouse gas emissions, improve air and water quality, preserve agricultural land, and shift development away from areas with high wildfire risks.**

As a result of its reliance on the 2050 household baseline rather than a growth-increment baseline, the RHNA reinforces historic patterns of urban sprawl and directs disproportionately large amounts of growth to rural and unincorporated areas. This is especially apparent in Alameda and Contra Costa Counties. The proposed 8-year RHNA for unincorporated Alameda and Contra Costa Counties is more than 10,000 units. Had ABAG used a methodology based on growth increments, the total would have been less than half this number. The RHNA further appears to direct thousands of new housing units into the most fire-prone communities in the Bay Area, including unincorporated Marin, Napa and Sonoma Counties. Wildland Urban Interface cities like Piedmont also receive disproportionately large numbers relative to cities with lower hazard levels.

Whereas Blueprint 2050 correctly and appropriately directs the region's growth toward urban centers, transit nodes, job hubs, and Priority Development Areas, the draft RHNA appears to do just the opposite. Cities in Santa Clara County, the fastest growing job center in the region, have comparatively lower increases in their RHNA's than cities in the East Bay and North Bay. Marin County, which according to Blueprint 2050 will lose 11 percent of its employment base in the next 30 years, experiences some of the largest increases in local RHNA's in the Bay Area. This is counterintuitive.

The assignment of high RHNA's to low-growth cities and unincorporated areas rather than to the region's growth centers appears to run counter to SB 375, AB 32, SB 743, and many other bills aimed at reducing greenhouse gas emissions and vehicle miles traveled. VMT will not decrease and GHG targets will not be met if housing is built in areas where little to no job growth is expected. We question why job centers and transit-rich locations such as San Jose and Oakland have proposed RHNA's that are roughly 80 to 90 percent higher than the prior cycle while small cities with little to no employment growth have RHNA's that are increasing by 500 to 1000 percent.

The discrepancies can largely be traced to the flawed baseline. If not corrected, the outcome will be in direct conflict with numerous State initiatives.

**5. The Draft RHNA numbers do not appear to support equity goals, as they assign “above market rate” housing to affluent jurisdictions to a far greater extent than the last three RHNA cycles.**

We applaud ABAG’s efforts to develop a RHNA that is more equitable and assigns affluent communities more responsibility for accommodating the region’s housing needs. We fully support the application of weighting factors that shift a greater share of the responsibility for providing lower income housing to “high opportunity areas.” However, if the weighting factors are applied to a baseline that is radically inflated for these communities, the outcome will be the opposite of what is intended.

In Piedmont’s case, our prior (2015-2023) RHNA was appropriately weighted toward production of low and very low income units. Roughly 63 percent of our City’s allocation during the 2015-2023 cycle was for low and very low income units. Only 12 percent of our allocation was for above-moderate income units. This allowed the City to focus its Housing Element on strategies to construct affordable multi-family housing and rent-restricted accessory dwelling units.

The proposed 2023-2031 RHNA for Piedmont inexplicably shifts the focus to moderate and above moderate income units. In fact, the City’s “above moderate” income assignment increases from seven units (2015-2023) to 243 units (2023-2031), an increase of almost 3,500 percent. As a percentage of the total RHNA, “low” and “very low” income housing drops from 63 percent to 44 percent. While the total number of low and very low income units still goes up substantially, the implied message is that the City must significantly increase its production of market-rate housing.

Given market economics in Piedmont, it would seem more logical to significantly reduce the total RHNA number while increasing the share of units that should be affordable.

**A Better Way Forward**

In closing, we wish to offer a proposed alternate approach to calculating the RHNA. We believe there is a “win-win” solution that incorporates the good work and enormous effort undertaken thus far by ABAG staff, the Housing Methodology Committee, and the other ABAG Boards that have considered this matter. We encourage you to take the following steps:

1. Publish the jurisdiction-level forecasts for Plan Bay Area 2050. Ensure that no individual city (or unincorporated county) in the Bay Area is assigned an 8-year RHNA that exceeds their 35-year growth forecast. This process needs to be transparent and this data needs to be made available for review by all local governments.
2. Recalibrate the RHNA using a baseline that represents a true “middle ground” between the two baselines that were considered by the Housing Methodology Committee. This baseline should be a weighted average between the two approaches that were initially considered. We suggest that:

- 30 percent of the baseline should be based on the “Blueprint 2050 Household” figures (i.e., the currently proposed baseline)
- 70 percent should be based on the 35-year growth increment for each jurisdiction as calculated in the PBA 2050 Blueprint forecasts.

It is imperative that the projected growth increment for each city be considered in the methodology. This is the only way to reliably ensure consistency with regional plans, reduce VMT and GHG emissions, balance job and household growth, and recognize land capacity constraints in the assignment of the RHNA.

3. Once growth allocations are made, place a greater weight on equity and income factors so that more affluent communities are assigned higher shares of low and very low income housing. These numbers become much more attainable when they are calculated as a share of a more realistic RHNA.

If the above steps are taken for Piedmont, we believe our RHNA would be approximately 200 units. This would represent a 233 percent increase over our prior RHNA, which is substantially higher than the 134 percent increase for the nine-county Bay Area. Approximately 60 to 65 percent of this target should be for low and very low income units (rather than the 44 percent proposed by ABAG). Achieving this target in eight years would be extraordinarily difficult but would at least be possible.

By contrast, a 917 percent increase in our RHNA, as proposed by ABAG, is not at all realistic. This is largely due to factors beyond the City’s control, such as the regional economy and real estate market, infrastructure, physical constraints, absence of redevelopable land, natural hazards, and fiscal considerations. The enormity of the proposed allocation defeats the intent of the RHNA and the purpose of the Housing Element itself.

On behalf of other small, land-constrained communities throughout the Bay Area, we hope you will consider our comments and alternative approach. We believe this would be a fairer and more equitable way to meet the region’s housing needs, and provide a more realistic and productive path forward.

Please do not hesitate to contact me if you have questions or would like to discuss this letter further.

Sincerely,

CITY OF PIEDMONT



Sara Lillevand  
City Administrator

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

City of Piedmont  
Comments on Proposed RHNA Methodology

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)



# TOWN of PORTOLA VALLEY

Town Hall: 765 Portola Road, Portola Valley, CA 94028 Tel: (650) 851-1700 Fax: (650) 851-4677

November 20, 2020

Association of Bay Area Governments - Metropolitan Transportation Commission  
375 Beale St, Suite 800  
San Francisco, CA 94105

Re: Proposed RHNA Methodology and Subregional Shares

To Whom It May Concern-

Thank you for the opportunity to comment on the draft Regional Housing Needs Allocation (RHNA) methodology. The Town Council, after discussions at our November 11 meeting, tasked a subcommittee to draft a letter commenting on the draft methodology for the upcoming Regional Housing Needs Allocation (RHNA) process. The comments below reflect the Council's collective thoughts on the matter.

In 2016, the Portola Valley Town Council adopted a Housing Strategic Plan that has served as the foundation for a substantial and (so-far) successful effort to increase the Town's housing stock. This plan recognizes that three Portola Valley populations face particular housing challenges: seniors who wish to stay in the community they call home have few options to downsize; those who have grown up in Portola Valley but have no option to move back (save move in with their parents); and the workforce that commutes to town to support the community.

This plan has resulted in the following successes:

- Formal identification of Town property suited for potential future development
- Rapid expansion of ADU opportunities (many implemented before State legislation) and an education program that has prompted the construction of new ADUs (including an ADU open house)
- Engagement with large landowners on opportunities on their property for housing (with one active application for a development project and the potential for additional in the coming years)
- Addition of new partners in the Town's affiliated housing program, which allows for housing development beyond single-family resident development; these partners are considering future options

- Multiple public meetings providing the Town Council opportunity to hear from residents on their preferences for future housing options

These efforts (particularly those related to ADUs) have resulted in the Town exceeding its current RHNA numbers a full three years before the end of this cycle's Housing Element. The Council intends to fully implement the Housing Strategic Plan, and more broadly to continue finding ways to create new housing opportunities. This comes with the commitment of planning for future housing under the upcoming Housing Element cycle.

As the Town begins its formal process to adopt a new Housing Element, we also recognize two challenges that we wish to share with you that you may want to consider as you finalize the methodology.

### **1. Public Safety**

As the realities of a changing climate have become more obvious, the Town has applied considerable resources to mitigate the impact of future wildfires. While the Town has always understood that wildfire is a reality, the devastating fires in northern California since 2017, and our recent experience with the CZU Lightning Complex fires, has further emphasized the need to do everything we can to ensure the safety of residents and visitors alike.

To that end, the Town is spending hundreds of thousands of dollars on a large-scale (but first round) vegetation management program on Town-owned property (focused on the right-of-way currently), and has empowered an ad hoc committee to recommend initiatives and programs to harden homes, improve communications and evacuations, and identify and remove high-fire prone vegetation Town-wide.

As you know, CalFire is amending the state fire maps. While a portion of Portola Valley is included in the "very high fire danger" designation, it is highly probable that additional Portola valley lands may be included in the amended map.

Regardless of these mitigation efforts, given the nature of the community and its lands and the inability to construct new roads to address evacuation expansion opportunities, the Town will remain highly susceptible to wildfires. We welcome an engagement with ABAG-MTC on the sensibleness of significant numbers of new homes in high-fire danger areas.

## 2. Infrastructure

There are two elements to the Town's infrastructure comments:

### a. Physical –

As touched on in the public safety comments, the Town's infrastructure was developed and constructed to support a primarily single-family residential community on large lots. This includes just two primary roads in and out of Town. Right-of-way for future road expansion does not exist along most portions of these two roads (or, in the case of Arastradero Road, a secondary access road to Town, are not under the Town's jurisdiction).

A privately held company, and a special district provide water and sewer services. Fire services are supported by a special district. It is unclear that much development would be pursued, or be economically feasible, without the costly construction/provision of these services in advance of a project, which would make the goals underpinning the methodology difficult to achieve in Portola Valley without substantial capital outlay.

### b. Staffing -

It has been nearly a generation since the Town managed a major, multi-unit housing development project. The Town's Planning and Building Department is currently managing a proposal from Stanford University for 27 single-family residences for Stanford faculty and 12 affordable multifamily housing units. This proposal required the addition of a contract planner and other associated support.

Should the draft methodology be implemented (with its accompanying RHNA), it could be the equivalent of Stanford Wedge-sized project every year for the length of the next Housing Element cycle, on top of continuation of the pace of all the housing unit production that the town will achieve in the current cycle. As the smallest staffed city in San Mateo County (and the lowest levels of revenue collection and expenditure), it is improbable that there would be an ability to hire enough staff to ensure a transparent and equitable entitlement process for any future applicants.

## Conclusions

As discussed in this letter, the Town of Portola Valley has taken its commitment to providing adequate housing to the populations it serves seriously, and expects to do so in the next Housing Element cycle. In many ways, we see the work completed so far as a blueprint for other similar communities who wish to be serious about considering housing in a different light.

Nonetheless, we do believe that there are unique challenges in Portola Valley that should be considered and included as part of any adopted methodology.

We welcome a visit by ABAG staff and representatives to Portola Valley so these unique characteristics can be viewed first-hand, and we would be happy to design a safe way to accommodate such a visit.

Sincerely,

A handwritten signature in blue ink, appearing to read 'CH', with a large loop at the end.

Craig Hughes  
Councilmember

A handwritten signature in blue ink, appearing to read 'JR', with a large loop at the end.

John Richards  
Councilmember

cc: Portola Valley Town Council  
Planning Commission  
Woodside Fire Protection District



November 24, 2020

Executive Board, Association of Bay Area Governments  
375 Beale Street, Suite 700  
San Francisco, CA 94105

Dear President Arreguin, Vice President Ramos, and Members of the Executive Board:

On behalf of the Town of Ross, we wish to thank the ABAG Executive Board and the ABAG Housing Methodology Committee (HMC) for the challenging work and creative thinking that has gone into distributing 441,000 new units in the 6<sup>th</sup> Cycle Regional Housing Needs Allocation (RHNA). We support the use of the Plan Bay Area 2050 Blueprint in developing the RHNA methodology, but respectfully request that the Executive Board amend the baseline to utilize the Blueprint's *Household Growth* metric instead of *Households* as proposed by the HMC.

The HMC's recommended baseline allocates too many units to suburban areas that are far from job centers, lack adequate transportation infrastructure, and are in areas of wildfire risk. The proposed HMC methodology will not further greenhouse gas reduction goals and is inconsistent with the growth patterns and policy objectives more carefully considered in the Plan Bay Area 2050 Blueprint.

The Town of Ross faces significant constraints to development that are not accurately reflected in the *Households* baseline. More than one quarter of our parcels are within FEMA's 100-year Special Flood Hazard Area and practically the entire Town is in the Wildland Urban Interface. Additionally, small suburban communities like Ross do not have the capacity or the expectation for substantial job growth. In place of the HMC proposal, we recommend the ABAG Executive Board follow ABAG staff's July 2020 suggestion to utilize the Plan Bay Area 2050 Draft Blueprint in the RHNA methodology with each jurisdiction's share of *Household Growth* from 2010 to 2050 as the baseline.

The Town supports the *Household Growth* baseline, as it results in higher allocations for jurisdictions with significant jobs that are experiencing growth, including communities that have elected to be Priority Development Areas. The State Housing and Community Development Department (HCD) has already approved using regional plan household growth as a baseline for 4 of the 8 approved 6<sup>th</sup> Cycle RHNA methodologies (with 3 others using baselines that factor in jobs, and one using a variety of factors). Utilizing the *Household Growth* baseline would enable the Town of Ross to prepare our General Plan Housing Element to accommodate housing development in a way that realistically considers climate change, our unique environmental conditions, and our relationship to the Bay Area's transportation network.



The Town of Ross remains committed to addressing the housing crisis. During the current RHNA cycle we have upzoned our commercial zoning district to allow as-of-right multifamily housing and in the past year we have been collaborating with other Marin jurisdictions to develop Objective Design Standards to streamline residential construction. We have also updated our Zoning Ordinance to provide additional allowable floor area for ADUs with a very low income rent restriction. We are proud of the fact that we have been able to deliver on our 5<sup>th</sup> Cycle RHNA obligation in all income categories. Again, thank you for your contribution to the region's planning and for your consideration of this request.

Sincerely,



Julie McMillan  
Mayor



Joe Chinn  
Town Manager

Ford Greene  
Mayor

Brian Colbert  
Vice Mayor

Steve Burdo  
Council Member

Alexis Fineman  
Council Member

John Wright  
Council Member



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[www.townofsananselmo.org](http://www.townofsananselmo.org)

October 13, 2020

Mayor Jesse Arreguín, President  
Association of Bay Area Governments (ABAG) Executive Board  
375 Beale Street, Suite 700  
San Francisco, CA 94105-2066

Re: Request for Use of Plan Bay Area 2050 Household Growth as Baseline for RHNA  
Methodology

Dear Board President Arreguín:

The Town Council of the Town of San Anselmo submits the following comments on the proposed Regional Housing Needs Allocation (RHNA) methodology recommended by the ABAG Housing Methodology Committee (HMC). San Anselmo respectfully requests the ABAG Executive Board to modify the RHNA methodology baseline to the *Plan Bay Area 2050 Blueprint Household Growth*. A revision to the baseline proposed by HMC is necessary to further the intent of statutorily mandated objectives and for the RHNA to be consistent with Plan Bay Area 2050.

The methodology recommended by the HMC allocates too many units to suburban areas that are far from job centers, lack adequate transportation infrastructure, and are in areas of wildfire risk. The proposed HMC methodology will not further greenhouse gas reduction goals and is inconsistent with the growth patterns and policy objectives more carefully considered in the *Plan Bay Area 2050 Blueprint*.

Small jurisdictions are being set up for failure under the proposed methodology. San Anselmo's proposed RHNA is 700% higher than our current RHNA, amounts to more units than it has been



allocated over the last four RHNA cycles combined, and exceeds the number of units that have been built in the Town over the past 50 years.

In place of the HMC proposal, we recommend the Executive Board follow ABAG staff's July 2020 suggestion to use the *Draft Blueprint* in the RHNA methodology by using each jurisdiction's share of **Household Growth** from 2010 to 2050 as the baseline. While the Town would prefer a baseline that includes jobs, we support the **Household Growth** baseline, as it results in higher allocations for jurisdictions with significant jobs that are experiencing growth, including communities that have elected to be Priority Development Areas. "This approach is consistent with how long-range forecasts have been used in ABAG's methodologies for previous RHNA cycles." (July 9, 2020, HMC Meeting #8, Item 6a, Attachment A, Page 3). In addition, the State Housing and Community Development Department (HCD) has already approved using regional plan household growth as a baseline for 4 of the 8 approved 6<sup>th</sup> Cycle RHNA methodologies (with 3 others using baselines that factor in jobs, and one using a variety of factors). The advantages of this baseline are summarized by ABAG staff (July 9, 2020, HMC Meeting #8, Item 6a, Attachment A, Page 3):

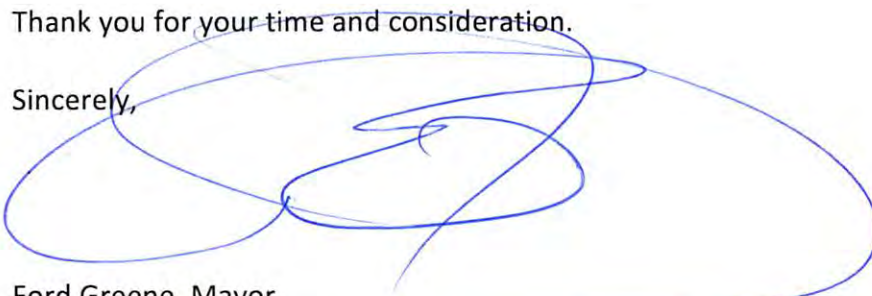
- Simple and straightforward to implement and discuss (e.g., "the methodology aligns with growth predicted by Plan Bay Area 2050")
- Integrates transit, hazards, and market feasibility through strategies and modeling
- Better aligned with Plan Bay Area 2050
- Emphasis on current and future employment development patterns leads to RHNA allocations more focused in Silicon Valley, region's largest job center
- Higher RHNA allocations in high resource areas near major job centers – notably in the South Bay

The baseline proposed by HMC, in combination with the additional factors and weights for allocating units by income category, result in allocations inconsistent with the Plan Bay Area Blueprint. For example, San Anselmo is forecasted to grow by fewer than 1,000 households during the 30 year Plan Bay Area 2050, but under the proposal, the Town is assigned 750 housing units for the first eight years of the Plan period. On a larger scale, the Household baseline fails to proportionally assign units to urban jurisdictions that are experiencing growth in both jobs and housing, and where housing will actually be built. For example, the proposed methodology allocates San Jose fewer units than San Francisco, even though Plan Bay Area forecasts that San Jose will create a half million jobs and San Francisco 182,000 jobs by 2050. However, using the **Household Growth** baseline, San Jose receives more units than San Francisco in an amount that is equal to 1/3 of San Jose's forecasted household growth in 30 years.

Finally, the Town requests that ABAG add to the *2050 Plan Bay Area Blueprint* Wildland-Urban Interface Fire Threat areas for the San Francisco Bay Region, which is available in the Metropolitan Transportation Commission Map Gallery. Currently, only CAL FIRE Very High Severity zones are factored into the Plan, which do not adequately represent wildfire risk in the Bay Area.

Thank you for your time and consideration.

Sincerely,

A large, stylized handwritten signature in blue ink, consisting of several overlapping loops and a long horizontal stroke extending to the right.

Ford Greene, Mayor

cc: Dennis Rodoni, Supervisor, County of Marin  
Pat Eklund, Mayor Pro Tem, City of Novato

# County of Santa Clara

## Board of Supervisors

County Government Center, East Wing  
70 West Hedding Street, 10th Floor  
San Jose, California 95110-1770  
(408) 299-5001 FAX 938-4525  
www.sccgov.org



November 3, 2020

President Jesse Arreguin  
ABAG Executive Board  
375 Beale Street, Suite 800  
San Francisco, CA 94105-2066

### **RE: County of Santa Clara Unincorporated RHNA Allocation per Option 8a**

Dear President Arreguin and ABAG Executive Board:

On behalf of the County of Santa Clara Board of Supervisors, I am writing to express objections regarding ABAG's adoption of Option 8a as the Regional Housing Needs Allocation (RHNA) distribution methodology, and specifically policy conflicts that would arise from the resulting RHNA of 4,139 housing units for the County of Santa Clara unincorporated area.

The County of Santa Clara (County) has been a strong leader in increasing housing production to address the ongoing housing crisis and affordability gap in the Bay Area. In 2016, the County Board of Supervisors sponsored ballot initiative Measure A, a \$950-million affordable housing bond passed by the voters. Measure A Bond proceeds contribute to the creation or preservation of over 4,500 units countywide, and the County has already supported 28 housing developments and allocated \$25 million for a first-time homeowner buyer program.

Additionally, the County has taken strong measures to increase the housing supply in the unincorporated areas. These measures include adoption of Inclusionary Housing Ordinances in 2018 and 2020, adoption of State-compliant Accessory Dwelling Unit (ADU) regulations that allow increased flexibility in housing types, including the use of mobile tiny homes, and adoption of an Agricultural Worker Housing Ordinance in 2020 that streamlines agricultural worker housing production.

Concurrently, the County has been a leader in advancing sustainability and climate resiliency in alignment with the State's climate goals and policy mandates. Since 1980, the County has maintained foundational General Plan policies that direct all urban growth into the cities while maintaining rural unincorporated areas for resource conservation and agriculture preservation. Consistent with these objectives, the County adopted the Santa Clara Valley Habitat Plan in 2012 and the

#### Board of Supervisors:

Mike Wasserman  
District 1

Cindy Chavez  
District 2

Dave Cortese  
District 3

Susan Ellenberg  
District 4

S. Joseph Simitian  
District 5

County Executive: Jeffrey V. Smith

Santa Clara Valley Agricultural Plan in 2018, which direct further investments into preserving habitat and agricultural lands within the rural areas.

Under the Option 8a RHNA distribution methodology, the County of Santa Clara unincorporated area would receive a RHNA of 4,139 units, to be completed over the next Housing Element Cycle (2023-31). Based on the County's General Plan policies and land use framework, the County has very limited jurisdiction over urban housing production. Approximately 98.9 percent of the County's unincorporated lands are in rural areas, which lack municipal services such as sewer and are identified for resource conservation. The County's urban unincorporated policies require new development within urban unincorporated areas to petition for annexation into Cities. A RHNA of 4,139 units—representing over a 1,300% increase over the previous RHNA allocation of 277 units in the last housing cycle—would require the County to rezone its rural areas for urban housing development, conflicting with the County's General Plan and sustainability and greenhouse gas reduction goals in both adopted State policies and within the Plan Bay Area 2050 Blueprint.

The County's Department of Planning and Development staff has determined that the County has the capacity to support approximately 2,000 units in the urban unincorporated areas for the 2023–31 Housing Element cycle, incorporating a variety of housing production strategies. This commitment to 2,000 units still represents a 620% increase over the County's previous RHNA, but underscores the County's strong commitment to produce housing within its capacity without undermining climate action and resource conservation goals.

A RHNA above this amount requiring urban housing in the County's rural areas conflicts with Housing Element Law, specifically RHNA Objective 2 (California Government Code section 65584(d)(2)), which states:

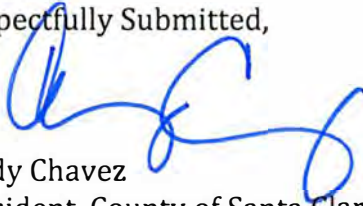
*“Promoting infill development and socioeconomic equity, the protection of environmental and agricultural resources, the encouragement of efficient development patterns, and the achievement of the region's greenhouse gas reductions targets provided by the State Air Resources Board pursuant to Section 65080.”*

The requirement for the County to designate rural and agricultural areas for urban housing production also conflicts with the Plan Bay Area 2050 Blueprint that designates a majority of the County's rural areas as Priority Conservation Areas. The vast majority of the County's 65 Priority Conservation Areas identified by ABAG are located within our rural areas, identified for conservation as natural landscapes, regional recreation, and as agricultural lands. Conversion of these lands into urban housing would conflict with these resource conservation goals, concurrently increasing greenhouse gas emissions and vehicle miles traveled, contrary to the State's climate action goals.

We would like to reiterate the County is strongly committed to both housing production and greenhouse gas reduction. The County has continued to stake a leadership position in increasing housing production within our urban areas while preserving our rural and agricultural areas for resource conservation, in alignment with State and ABAG climate action goals along with greenhouse gas reduction and regional resiliency. We respectfully ask ABAG to identify and implement a modification to Option 8a that avoids the increase in RHNA for the County of Santa Clara's unincorporated areas.

Thank you for the opportunity to comment.

Respectfully Submitted,

A handwritten signature in blue ink, appearing to read 'Cindy Chavez', with a stylized, flowing script.

Cindy Chavez  
President, County of Santa Clara Board of Supervisors



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

November 16, 2020

Hon. Jesse Arreguin  
ABAG Executive Board  
Bay Area Metro  
375 Beale Street  
San Francisco, CA 94105

**VIA EMAIL**

RE: Public Comment on Proposed RHNA Methodology

Dear Board President Arreguin and Members of the Executive Board:

On behalf of the Cities Association of Santa Clara County, we would like to thank ABAG's leadership and staff for all of your hard work and dedication over the course of the past year through the Housing Methodology Committee (HMC) process. The Cities Association supports a Regional Housing Needs Assessment (RHNA) methodology that:

- Advances the RHNA statutory objectives
- Allows for an equitable distribution throughout the region
- Preserves open space
- Performs well in reducing GHG emissions
- Allows for consistency between RHNA and Plan Bay Area 2050
- Is a strong methodology to submit to the HCD for approval.

The Cities Association, however, objects to a methodology that allocates the largest share to Santa Clara County again. Santa Clara County is also one of only 3 jurisdictions where its share of the RHNA allocation would exceed its share of Bay Area Households. As we have shared before, we believe the RHNA process should be delayed until the State has a better understanding of the impact of COVID, including but not limited to the impact on job and household growth based on the increase in the number of employers allowing employees to telecommute. Additionally, the Cities Association has serious concerns that a significant portion of the underlying data used in Plan Bay Area 2050 is inaccurate, incomplete and/or outdated.

Similar to other counties in the region and statewide, our residents and elected officials are questioning where and how they will be able to build these large shares of allocated units, especially when we already struggled the last 8 years to meet much lower numbers. The solution is not increasing the RHNA numbers; instead, our leaders should first identify the barriers to building more housing and help local communities tackle those barriers.

Finally, we understand that the total number of units for the nine Bay Area region was determined by the California Department of Housing and Community Development (HCD). Therefore,

we strongly urge ABAG to join us in advocating against moving forward with the RHNA process at this time. Proceeding now will only set local communities up to fail and still not help to solve the problem. Instead, we recommend that the HCD, ABAG and the other regional groups form a committee to develop real solutions to California's housing crisis, and we are ready to partner with you on such an effort. Thank you again for all your work this year.

Thank you for your consideration.

Sincerely,



Larry Klein  
President, Cities Association  
Mayor, City of Sunnyvale



Neysa Fligor  
Chair, Legislative Action Committee  
Vice-Mayor, City of Los Altos

cc: Senator Wieckowski  
Senators-Elect Becker, Cortese, Laird  
Assembly Members Rivas, Kalra, Chu, Berman, Low, Stone  
Assembly Member-Elect Lee  
Gustavo Velasquez, Director, California Department of Housing & Community Development  
Keely Martin Bosler, Director, California Department of Finance  
Therese McMillan, Executive Director, ABAG & MTC



November 25, 2020

Contra Costa County Supervisor Karen Mitchoff, Chair  
Association of Bay Area Governments, Regional Planning Committee  
Bay Area Metro Center  
375 Beale Street, Suite 800  
San Francisco, CA 94105

**Re: Regional Housing Needs Allocation – Concerns About Recommended Housing Methodology**

Dear Supervisor Mitchoff,

The San Mateo County Planning and Building Department (Department) is writing to express its concern regarding the housing allocation to unincorporated San Mateo County proposed in the recommended housing allocation methodology, Option 8A, for the Regional Housing Needs Allocation (RHNA) Cycle 6. The proposed allocation presents significant practical issues for the County and has the potential to exacerbate climate change and negatively impact the County's open space, natural resources, and coastal areas. Thank you in advance for considering these comments.

The Department recognizes the magnitude of the housing crisis faced by the State, the Bay Area, and San Mateo County as a whole, and strongly supports Plan Bay Area's goals of incentivizing planning for sufficient housing to meet the region's needs, in ways equitable for all residents. The Department shares those goals. To that end, San Mateo County has been proactive in seeking housing solutions, both for the unincorporated areas, and for interjurisdictional solutions in collaboration with the County's incorporated partner cities. The County's Housing Department is a significant funder of housing for jurisdictions throughout San Mateo County and has provided financing to support development of 3,300 units affordable to low, very low, and extremely low income households since the advent of the County's Affordable Housing Fund in 2014. Half of those units are occupied or in construction, with another 1,700 in predevelopment. The County has also sponsored a number of initiatives, including the Home for All initiative and the 21 Elements collaborative, to work across jurisdictions to advance policies and strategies to increase the production, availability and affordability of housing Countywide.



The County has also aggressively promoted the creation of new housing in unincorporated areas, among other ways by incentivizing development of accessory dwelling units, rezoning for high density residential development, aggressively permitting affordable housing proposals, and adopting inclusionary housing requirements and affordable housing impact fees. San Mateo County supports all efforts to increase the availability and affordability of housing. However, the Department also recognizes that the location of such housing is critically important, and we are concerned that the allocation in the currently proposed methodology will create significant pressure to rezone non-residential, primarily undeveloped lands for residential uses.

A very large percentage of the land area within the unincorporated County remains undeveloped due to access, natural hazards, and infrastructure limitations, and because they are protected agricultural and resource management lands. The largest landowner in the County is the San Francisco Public Utilities Commission, whose watershed lands are undevelopable. The very limited amount of land within the County that is potentially available for development are highly constrained. Developing these areas would present significant challenges, and cause significant negative impacts, including:

- Loss of natural habitat and infringement on protected, threatened, or endangered resources.
- Loss of agricultural lands, including active farms and ranches.
- Increased fire danger. As the past few years have demonstrated, development in the County's rural areas is increasingly threatened by and will continue to face ever-greater fire danger, making development of these areas increasingly untenable.
- Overburdening available infrastructure. The County's rural lands are served by septic systems and well water, and are disconnected from the County's road and transit systems and other services.
- Impacts to coastal resources. San Mateo County has an extensive Coastal Zone, within which development is highly regulated and extremely constrained. Like the County's other rural areas, much of the Coastal Zone is disconnected from municipal services. Even the County's small urban coastal areas face strict limits on available water and other services. In areas directly adjacent to the coastline, coastal erosion and sea level rise are increasingly infringing on formerly developable lands, as well as threatening existing development. Development within the Coastal Zone is strictly constrained by the California Coastal Act and the County's Local Coastal Program (LCP), including voter-initiated growth limits within the County's LCP that cannot be amended without a Countywide referendum, preventing significant densification in even the existing urban areas in the County's Coastal

Zone.

The climate impacts of new development in undeveloped unincorporated areas are also significant, as development in many of these areas could generate long commutes to jobs and services, as well as require the expenditure of great deals of energy to create and maintain the new infrastructure that would be required to serve them.

For these reasons, the Department believes that the priority for any housing policies should be the promotion of compact, transit-oriented, infill development or redevelopment in the urbanized core of the San Mateo County Peninsula. Such development is consistent with the objectives in State housing element code, Gov. Section 65584(d)(2):

*(2) Promoting infill development and socioeconomic equity, the protection of environmental and agricultural resources, the encouragement of efficient development patterns, and the achievement of the region's greenhouse gas reductions targets provided by the State Air Resources Board pursuant to Section 65080.*

In addition, this type of development is most consistent with the goal of Plan Bay Area, per Senate Bill 375, to reduce greenhouse gas emissions by focusing housing near jobs and transit.

However, while the Department supports development that meets these criteria, the urbanized unincorporated areas of San Mateo County make up only a small fraction of County territory, and are primarily located within the boundaries of incorporated cities. These areas are limited in size, and are in many cases already zoned to the maximum densities that can be supported by infrastructure.

In addition, the County relies on external service providers to provide water, wastewater, and other services to these areas, and has no independent ability to increase service capacity. In North Fair Oaks, for example, a Priority Development Area that the County has significantly up-zoned in recent years consistent with the adopted North Fair Oaks Specific Plan, emerging wastewater constraints may prohibit development even at the densities allowed by the newly adopted zoning, unless the County can obtain additional wastewater service capacity. Similar conditions pertain in other unincorporated urbanized areas, including the Harbor Industrial, Broadmoor, Sequoia Tract, and Devonshire communities.

The Department does not take issue with the composition of the proposed allocation by affordability level. Our concern is the magnitude of the total allocation, and its likelihood to necessitate greenfield development outside of the County's urbanized areas. We would

note that while the County's proposed housing allocation under Option 8a is 2,933 units, approximately three times the final allocation during the last Housing Element Cycle, the County's allocation from ABAG/MTC in the 2014 – 2022 RHNA cycle was initially only approximately 300 units in total. The County subsequently voluntarily accepted 600 additional units from incorporated cities, as part of the sub-regional allocation process then in effect. The current proposed allocation is nine times the allocation arrived at by ABAG/MTC as part of Plan Bay Area analysis in Cycle 5. An allocation of this size seems certain to necessitate development in formerly undeveloped areas of the County. Such development would be in conflict with the Plan Bay Area Priority Conservation Area program.

Again, The Department recognizes that Plan Bay Area strives to balance growth in the built environment and the protection of natural resources, as well as addressing the needs of residents throughout the region. However, given the potentially grave negative impacts of development outside of urban infill areas, the County strongly urges reconsideration of the proposed allocation, and consideration of the number of housing units that can be realistically accommodated primarily in these areas.

The San Mateo County Planning and Building Department has many resources available to further document these points, and its staff would welcome the opportunity to collaborate with ABAG on an allocation number that is aggressive, realistic, and environmentally sound. Thank you for considering this offer and the comments contained in this letter. Please feel free to contact me if you have questions or if you would like to discuss these matters further.

Sincerely,

A handwritten signature in dark ink, reading "Steve Monowitz". The signature is fluid and cursive, with a large, stylized "S" at the beginning and a long, sweeping underline that extends to the right.

Steve Monowitz  
Community Development Director



## CITY OF SAUSALITO

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Telephone: (415) 289-4100  
[www.sausalito.gov](http://www.sausalito.gov)

November 18, 2020

Mayor Jesse Arreguín, President  
Association of Bay Area Governments (ABAG) Executive Board  
375 Beale Street, Suite 700  
San Francisco, CA 94105-2066

Re: Request for Plan Bay Area 2050 Household Growth as Baseline for RHNA Methodology

Dear Board President Arreguín:

Thank you for the difficult work to ensure the Regional Housing Need Allocation is distributed in an equitable way that both seeks to provide opportunity to those in need of housing and ensures that our shared goals to put housing near services and jobs to address climate change are addressed. The City of Sausalito is committed to providing housing opportunities to all segments of the community and to taking on its fair share of housing units that are needed State wide. We are committed to providing affordable and workforce housing that provides residents the same chance to live in a safe neighborhood with great schools, healthy food options, public libraries, community centers, parks and trails, transportation hubs, and access to employment centers.

However, we are concerned that the proposed methodology under consideration by ABAG and assumptions in the Blueprint 2050 will result in a significant increase in the Regional Housing Need Allocation (RHNA) in the City of Sausalito (over 800% higher than our current RHNA) that may make it impossible for us to meet these housing goals. The City is submitting the following comments on the proposed Regional Housing Needs Allocation (RHNA) methodology under consideration by ABAG. The City of Sausalito respectfully requests ABAG modify the RHNA methodology baseline to the *Plan Bay Area 2050 Blueprint **Household Growth***. A revision to the baseline proposed by Housing Methodology Committee (HMC) is necessary to further the intent of statutorily mandated objectives and for the RHNA to be consistent with Plan Bay Area 2050.

Sausalito has made great strides over the last two housing element cycles to develop and promote innovative housing solutions to meet our fair share. We have also received a certification of our Housing Element from the State Department of Housing and Community Development (HCD) since 2012 and we wish to continue with this success. Some of our recent successes include:

- Safe Harbor Pilot Program. The one of its kind Sausalito Safe Harbor Program, which began in 2019, houses and provides services to members of the anchor-out community who were originally in Richardson Bay. Each participant in this program is assigned a case manager through a partnership with the Ritter Center's Whole

- Person Care program for ongoing social services through wrap around case management and supports annual ongoing lease payments to marina operators for slips. The goal of the program is to make the vessels sea-worthy, safe and stable enough to be housed in a marina.
- Objective Design and Development Standards. The City has partnered with the County and other Marin jurisdictions to develop a “toolkit” to develop objective design and development standards which address several amendments to housing legislation, including the Housing Accountability Acts (AB 678, SB167, and AB1515) and SB35.
  - Inclusionary Housing. In 2019 the City of Sausalito adopted our first inclusionary housing ordinance to mandate that all projects four units and greater provide a minimum of 15% affordability. In addition, the City has partnered with the County and other Marin jurisdictions to develop a residential in-lieu fee and explore a commercial linkage fee, in order to seed an Affordable Housing Trust Fund.
  - Accessory Dwelling Unit Website. The City has partnered with the County and other Marin jurisdictions to develop a shared ADU website that will create a homeowner tool that gives access to floor plans, process videos, regulation summaries, and a calculator with cost estimates in order to encourage homeowners in developing ADUs, increase the accessibility of useful materials and the level of information available to the public.
  - Exploring Housing Sites and Funding for Inadequately Housed Populations. Discussions in the spring of 2020 were held with Senator McGuire and the City of Sausalito in anticipation of potential financial support from the State of California in the form of competitive housing grants available as early as 2021 to meet the longstanding needs of inadequately housed populations such as the anchor-out community, seniors and the workforce. During those discussions, eight sites were preliminarily identified as candidates that could potentially be explored to provide permanent supportive housing for the anchor-out community in addition to senior housing and/or workforce housing.

We understand that our share of the RHNA will increase and we are committed to increasing our housing production, especially of homes affordable to lower income households. However, the methodology recommended by the HMC allocates too many units areas, such as Sausalito, that are in areas of wildfire risk, and to suburban areas far from job centers. The proposed methodology will not further greenhouse gas reduction goals and is inconsistent with the growth patterns and policy objectives more carefully considered in the *Plan Bay Area 2050 Blueprint*.

We recommend that ABAG follow ABAG staff’s July 2020 suggestion to use the *Draft Blueprint* in the RHNA methodology by using each jurisdiction’s share of **Household Growth** from 2010 to 2050 as the baseline. While the City would prefer a baseline that includes jobs, we support the **Household Growth** baseline as it results in allocations that reflect jurisdictions with significant jobs that are experiencing growth, including communities that have elected to be Priority Development Areas. “This approach is consistent with how long-range forecasts have been used in ABAG’s methodologies for previous RHNA cycles.” (July 9, 2020, HMC Meeting #8, Item 6a, Attachment A, Page 3). In addition, the State Housing and Community Development Department (HCD) has already approved using regional plan household growth as

a baseline for 4 of the 8 approved 6<sup>th</sup> Cycle RHNA methodologies (with 3 others using baselines that factor in jobs, and one using a variety of factors).

The advantages of this baseline are summarized by ABAG staff (July 9, 2020, HMC Meeting #8, Item 6a, Attachment A, Page 3):

- Simple and straightforward to implement and discuss (e.g., “the methodology aligns with growth predicted by Plan Bay Area 2050”)
- Integrates transit, hazards, and market feasibility through strategies and modeling
- Better aligned with Plan Bay Area 2050
- Emphasis on current and future employment development patterns leads to RHNA allocations more focused in Silicon Valley, region’s largest job center
- Higher RHNA allocations in high resource areas near major job centers – notably in the South Bay

The proposed Plan Bay Area 2050 Household baseline, in combination with the additional factors and weights for allocating units by income category, result in allocations inconsistent with the Plan Bay Area Blueprint. For example, the City is forecasted to grow by 1,000 households during the 30 year Plan Bay Area 2050 but is assigned 740 housing units for the first eight years of the Plan period alone. Upgrades to existing infrastructure (streets, sewers, storm drains, etc.) to accommodate the increased intensity of use would be required, and the City is concerned that eight years is not enough time to make these required infrastructure upgrades for 740 units.

On a larger scale, the Household baseline fails to proportionally assign units to larger jurisdictions that are experiencing growth in both jobs and housing, and where housing will actually be built. For example, San Jose is allocated fewer units than San Francisco even though Plan Bay Area forecasts that San Jose will create a half million jobs and San Francisco 182,000 jobs by 2050. However, using a baseline of *Household Growth* increases the units for San Jose above San Francisco in an amount that is equal to 1/3 of its forecasted household growth in 30 years.

Small jurisdictions are being set up for failure under the proposed methodology. Sausalito’s proposed RHNA is over 800% higher than our current RHNA. This proposed RHNA of 740 for the next eight years is more (by almost 100 units) than the total number of units we have been allocated over the last four cycles (34 years of RHNA allocations). See the table below:

| <b>RHNA Cycle</b>  | <b>Units Allocated to Sausalito</b> |
|--|-------------------------------------|
| 2 <sup>nd</sup> : 1988-1995  | 294                                 |
| 3 <sup>rd</sup> : 1999-2006  | 104                                 |
| 4 <sup>th</sup> : 2007-2014  | 165                                 |
| 5 <sup>th</sup> : 2015-2022  | 79                                  |
| <b>Total, RHNA Cycles 2<sup>nd</sup>-5<sup>th</sup> (34 years)</b> | <b>642</b>                          |

Finally, the City requests that ABAG add to the 2050 Plan Bay Area Blueprint Wildland-Urban Interface Fire Threat areas for the San Francisco Bay Region, which is available in the Metropolitan Transportation Commission Map Gallery. Currently, only CAL FIRE Very High

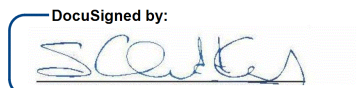


November 18, 2020, Page 4

Severity zones are factored in the Plan, which do not adequately represent wildfire risk in the Bay Area.

Thank you for your time and consideration.

Sincerely,

DocuSigned by:  
  
CF095EA91C8340C...  
Susan Cleveland-Knowles  
Mayor

cc: County of Marin Supervisors  
City of Sausalito Councilmembers  
Pat Eklund, Mayor Pro Tem, City of Novato

## DEPARTMENT OF RESOURCE MANAGEMENT

**TERRY SCHMIDTBAUER**  
Director (Interim)

**ALLAN CALDER**  
Planning Services Manager



# SOLANO COUNTY

675 Texas Street, Suite 5500  
Fairfield, CA 94533-6342  
(707) 784-6765  
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[www.solanocounty.com](http://www.solanocounty.com)

### Planning Services Division

November 10, 2020

Therese McMillan  
Executive Director  
ABAG & MTC  
375 Beale St., Ste. 800  
San Francisco, CA 94105

Re: Proposed RHNA Methodology and Subregional Shares

Dear Ms. McMillan:

Solano County would like to take this opportunity to provide comments on the proposed RHNA Methodology and Subregional Shares initially approved by your Executive Board on October 15, 2020.

#### Proposed RHNA Methodology

The proposed draft RHNA methodology was approved for public review and comment on October 15, 2020. It utilizes the draft 2050 Bay Area Blueprint (total households) as its baseline. Solano County has a concern with the application of the 2050 Blueprint as the baseline, as it has inherent flaws in its assumptions for unincorporated housing growth in Solano County. The Blueprint assumes that the County will be developing lands within the cities' Spheres of Influence (SOI) to significant density while still in the County (before annexation) and, as such, more housing development is attributed to the unincorporated County than should be for reasons further articulated below.

The County understands that the Blueprint is intended to project long term growth patterns on a regional scale and is not intended to analyze development at the local scale. However, when the Blueprint data becomes an input into the RHNA process, it must accurately reflect local city and county development strategies because RHNA itself is a local planning issue.

Solano County is rural and agricultural in nature, and its General Plan has and continues to contain strong policies encouraging city centered growth. The Orderly Growth Initiatives (1984, 1994, 2008) (extended by Measure T) is a voter approved initiative that prevents the conversion of agricultural lands to residential or commercial without voter approval at a general election.

The October 15, 2020 draft methodology assigns Solano County 1,016 units that need to be incorporated into its Housing Element. This is an extremely high number and virtually impossible to accommodate for a predominantly rural and agricultural county without the benefit of significant urban services (sewer/water). This flaw is not the fault of the methodology factors and weighting but from using the 2050 Blueprint as the baseline.

Without incorporating the recommended factors and weights of the methodology, the Blueprint baseline assumes that the County will have a RHNA requirement of 1,850 housing units for the upcoming RHNA timeframe. Of these units, 1,080 are anticipated to be built within the LAFCO approved Spheres of

**SAEED IRAVANI**  
Building Official  
Building & Safety

**ALLAN CALDER**  
Program Manager  
Planning Services

**JAG SAHOTA**  
Manager  
Environmental  
Health

**SARAH PAPPAKOSTAS**  
Administrative Services  
Manager  
Administrative Services

**MATT TUGGLE**  
Engineering Manager  
Public Works  
Engineering

**CHARLES BOWERS**  
Operations Manager  
Public Works  
Operations

**CHRIS DRAKE**  
Parks Services  
Manager  
Parks

**MISTY KALTREIDER**  
Water & Natural  
Resources Program  
Manager

Influence of several cities within the County. This is fundamentally problematic for Solano County. The County does not provide urban services, and services cannot be extended to these areas without annexation to the city.

While Solano County has formed a subregion for re-allocating its countywide allocation to the County and each of its cities, the County does not want to be in a position to correct an assumption about housing that at the regional level was fundamentally incorrect. An adjustment should be made to either the 2050 Blueprint model and assumptions or to the RHNA allocation assigning development of lands within cities' Spheres of Influence to the cities and not the County. This adjustment will not impact the total subregional allocation and will more accurately and realistically reflect anticipated development patterns in future years.

Both ABAG staff and HCD staff have pointed out that RHNA units can be re-allocated to cities when land is annexed. However, current law will require the County to develop a certified Housing Element that will accommodate its RHNA allocation. The County will be expected to identify where and how it plans to locate or rezone for these units and plan for supporting infrastructure in a city sphere of influence, prior to annexation, in order to get its Housing Element certified. As such, transferring this RHNA responsibility at annexation provides no benefit to the County as it attempts to draft a certified Housing Element. Should the County fail to obtain certification of its Housing Element by HCD, there is risk of lawsuits, and it will not be eligible for many forms of funding and grants specifically earmarked to assist with the development of housing.

Solano County appreciates the opportunity to provide comments on the proposed RHNA methodology. Should you have any questions or comments regarding the content of this letter, please feel free to contact Matt Walsh at (707) 784-6765 or by email at [mwalsh@solanocounty.com](mailto:mwalsh@solanocounty.com).

Sincerely,

A handwritten signature in blue ink, appearing to read "Terry Schmidt", is written over a light blue circular stamp.

Terry Schmidtbauer, Interim Director  
Solano County Department of Resource Management

Cc  
Birgitta Corsello, CAO  
Solano County Board of Supervisors



## City of St. Helena

*"We will conduct city affairs on behalf of our citizens  
using an open and creative process."*

1572 Railroad Ave.  
St. Helena, CA 94574  
Phone: (707) 967-2792  
Fax: (707) 963-7748

[www.cityofstheleena.org](http://www.cityofstheleena.org)

November 24, 2020

Jesse Arreguin, President  
Association of Bay Area Governments (ABAG)  
Bay Area Metro Center  
375 Beale Street Suite 800  
San Francisco, CA 94105

Re: Proposed RHNA Methodology and Subregional Shares

Dear President Arreguin:

The City of St. Helena would like to thank the ABAG Housing Methodology Committee (HMC) for its important work and for the opportunity to provide HMC with more insight on how the Regional Housing Needs Allocation Proposed Methodology dated October 2020 would affect a small, rural community like St. Helena. We have carefully reviewed the Proposed Methodology and submit the following comments as part of the public comment period on the Proposed RHNA Methodology and Draft Subregion Share:

- The St. Helena General Plan designates nearly 50% of the incorporated areas as agriculture and open space with an additional 15% being heavily wooded areas on steep mountainous slopes (designated Woodlands and Watershed), leaving relatively limited in-fill capacity for development at densities needed to accommodate the allocation targets under the draft methodology.
- The recently adopted General Plan assumed up to 332 new housing units through year 2040 or approximately 15 units a year.
- The proposed RHNA assignment of 171 units over an 8-year planning period requires 21.375 units per year to be constructed, a 42.5% increase over the annual growth rate contemplated by the current General Plan. While St. Helena recognizes that all cities must share in the region's need to build new housing, this is a faster growth rate than anticipated in the City's planning documents.
- The accelerated growth required by these RHNA assignments will escalate the need for expanded and updated infrastructure; how are small communities like St. Helena going to pay for this infrastructure? We will enthusiastically work with ABAG-MTC and other local governments to advocate for additional State funding to assist with expanded and updated infrastructure in support of affordable housing projects.
- Although St. Helena is served by the Vine, Napa County's public transit system, this system is seldom used by those who have access to cars – in other words, it does not draw significant

numbers of commuters who either work in St. Helena or who live in St. Helena and work elsewhere. As a result, except where construction of low and moderate income housing enables workers to live closer to their place of employment, housing development beyond that contemplated by the City's General Plan would increase VMT and traffic congestion, and would not support greenhouse gas (GHG) emission reduction targets.

- Small, rural, agricultural communities are not appropriate locations for “high-rise” residential housing which further limits their ability to increase density.
- Our ability to assume more growth in the City became further constrained on October 27, 2020, when the City of St. Helena declared a Phase 2 water emergency. No new water connections are permitted during a Phase II emergency.
- The hills and mountains that frame the Napa Valley are in PG&E's Tier 3 high fire risk zone and have proven to be high fire hazard areas as evidenced by the Tubbs, Atlas, Hennessy (LNU Complex), and Glass fires of 2017 and 2020; this further limits our ability to accommodate additional growth outside existing urban limits.
- Placing homes near job centers and away from natural hazards (fire severity zones etc.) and preserving agricultural and open space areas should be given a high priority to avoid the inadvertent loss of farmland and open space and to reduce the significant cost of emergency mitigation and assistance.
- The aggregate total of St. Helena units in Table 5 should be 171, not 172. The proposed distribution by income category is:
  - Very Low: 46
  - Low: 27
  - Moderate: 27
  - Above Moderate: 71
- Upon the arrival of the COVID-19 pandemic in the Spring of 2020, a paradigm shift has occurred in urban centers around the world relating to commuting patterns and the density of cities identified as job rich centers. Many of the current telecommuting arrangements from Silicon Valley's technology giants are expected to remain post COVID-19. The region is also experiencing an exodus of workers leaving the Bay Area for Sacramento and other more affordable areas outside the region which will have impacts for years to come. Has ABAG and the RHNA Methodology Committee considered how these demographic shifts may change the assumptions?
- The City of St. Helena has faced extraordinary economic challenges this year due to the pandemic and the wildfires. Under these circumstances, it will be important for RHNA to avoid placing a disproportionate adverse financial impact on small, rural communities like ours.

The City of St. Helena appreciates this opportunity to review and comment on this very important housing growth strategy as our region prepares to begin the Housing Element update process. If you have any questions, please do not hesitate to contact me at [mderosa@cityofsthenana.org](mailto:mderosa@cityofsthenana.org).

Best regards,

A handwritten signature in dark ink, appearing to read "Maya DeRosa". The signature is fluid and cursive, with the first name "Maya" being more prominent than the last name "DeRosa".

Maya DeRosa, AICP  
Planning and Building Director  
City of St Helena

cc: Mayor and City Council  
Planning Commission  
Mark T. Prestwich, City Manager  
Aaron Hecock, AICP, Senior Planner  
Ethan Walsh, City Attorney



# Tri-Valley Cities

DANVILLE • LIVERMORE • PLEASANTON • SAN RAMON

November 17, 2020

Mayor Jesse Arreguin, President  
Executive Board, Association of Bay Area Governments  
375 Beale Street, Suite 700  
San Francisco, CA 94105

Dear Mayor Arreguin:

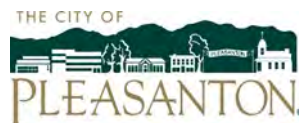
On behalf of the Tri-Valley Cities of Danville, Livermore, Pleasanton and San Ramon, we once again want to express our appreciation for ABAG's work on the 6<sup>th</sup> Cycle RHNA process, and to develop a methodology that appropriately and fairly distributes the 441,176 unit RHND recently allocated to the Bay Area by the State Department of Housing and Community Development (HCD).

On October 15, 2020, the ABAG Executive Board voted to support the Housing Methodology Committee's recommended methodology "Option 8A" and to forward it for public review in advance of submittal to the State Department of Housing and Community Development. The methodology utilizes the "Plan Bay Area 2050 Future Households" Baseline; and applies a series of Factors that adjust the Baseline allocation, with a strong equity focus ("Access to High Opportunity Areas"), and secondarily, jobs proximity, with the greatest weight given to jobs accessible by auto.

Prior to the October public hearing, on October 8, 2020 the Tri-Valley Cities submitted a letter expressing significant concerns with the proposed methodology, particularly that it would have several negative outcomes in terms of its resultant distribution of housing growth, inconsistent with Plan Bay Area and key regional planning goals. We are writing to reiterate those prior concerns, which were echoed in a similar letter from the Alameda County Mayor's Association and were also expressed by a number of ABAG Executive Board members and speakers at the October 15 hearing.

For Option 8A, these include housing allocations to Santa Clara County that fall far short of those projected in Plan Bay Area, and that fail to match the explosive jobs growth in the County over the past decade. And, significantly, we conclude the RHNA distribution resulting from Option 8A will work against key regional planning goals, including those to address GHG emissions by placing housing near jobs and transit centers, instead driving growth outwards, perpetuating sprawl and inefficient growth patterns.

As result, we would urge the Executive Board to consider an Alternative Methodology that 1) Uses the 2050 Household Growth Baseline; and 2) makes additional refinements to the Factors to allow for greater emphasis on transit and jobs access, while still maintaining an equity focus.





### **Impacts of HMC Recommended Methodology**

As noted in our prior correspondence, the proposed Baseline would significantly under allocate new housing to Santa Clara County, resulting in significantly higher allocations to other counties. This means that the methodology fails to adequately address the significant jobs-housing imbalance in Santa Clara County caused by its recent extraordinary jobs growth. In contrast to Plan Bay Area, which anticipates a 42% increase in housing growth in Santa Clara, the methodology assigns only 32% of the RHND there. This amounts to over 40,000 units allocated elsewhere in the region – most problematically, to our outer suburbs, small cities, and rural and unincorporated county areas.

The Contra Costa letter highlights some of the inequitable and unrealistic distributions to smaller cities across the region. In Danville, here in the Tri-Valley, the difference would amount to over 1,800 units, a more than 700% difference from the 2050 Growth Baseline. Similarly, large disparities are seen in other small cities.

Although the HMC's Option 8A provides an emphasis on equity and fair housing that is vitally important, we believe the unintended consequences of the growth patterns dictated by Option 8A may actually work against equity goals by:

- Inadequately addressing jobs-housing imbalances in the region requiring people to travel long distances from where they live to where they work.
- Driving growth from cities that want and need new housing to serve their communities and support their local economies.
- Underemphasizing transit access, thus increasing auto reliance for daily commutes and activities – at a significant economic, social and environmental cost to those residents.

### **Recommended Alternative Baseline and Factors**

As previously requested, and similar to the approach advocated by Contra Costa County and others at the Executive Board's October public hearing, we would urge the Executive Board to consider an Alternative to Option 8A, that shifts to use the "Plan Bay Area 2050 Growth" Baseline. We would also seek further refinements to the Factors as follows:


|   | <b>HMC Option 8A</b>   | <b>Proposed Alternative Methodology</b>  |
|---|--|--|
| <b>Baseline</b>                                 | <b>Plan Bay Area 2050 Households</b>   | <b>Plan Bay Area 2050 Growth</b>   |
| <b>Factors and Weighting</b>                    |  |  |
| <b>Very-Low and Low Income Units</b>            | <ul style="list-style-type: none"> <li>• 70 % Access to High Opportunity Areas</li> <li>• 15 % Jobs Proximity – Auto</li> <li>• 15 % Jobs Proximity - Transit</li> </ul> | <ul style="list-style-type: none"> <li>• 60 % Access to High Opportunity Areas</li> <li>• 20 % Jobs Proximity – Auto</li> <li>• 20 % Jobs Proximity - Transit</li> </ul> |
| <b>Moderate and Above Moderate Income Units</b> | <ul style="list-style-type: none"> <li>• 40 % Access to High Opportunity Areas</li> <li>• 60 % Jobs Proximity Auto</li> </ul>  | <ul style="list-style-type: none"> <li>• 20 % Access to High Opportunity Areas</li> <li>• 40 % Jobs Proximity - Auto</li> <li>• 40 % Jobs Proximity - Transit</li> </ul> |

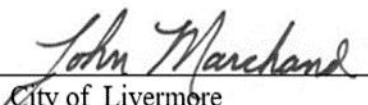
Together, these changes would have the following beneficial outcomes for the region, each of which would improve its consistency with Plan Bay Area:

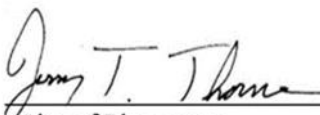
- **Increased share of RHNA to the “Big Three” cities and inner Bay Area**, and a corresponding decrease in that assigned to the outer Bay Area, unincorporated, and small and rural communities by approximately 30,000 units. This will ensure that the largest share of housing growth is allocated to the region’s biggest job centers, in areas well-served by transit and infrastructure.
- **Reduced allocation to unincorporated county areas by over 10,500 units** – avoiding further residential growth pressures in areas most subject to natural hazards, lack of infrastructure capacity, and threatened loss of agricultural and open space land.
- **Alignment of the share of housing growth in Santa Clara County to match Plan Bay Area 2050 and the County’s significant jobs growth of the past decade.** Santa Clara, home of some of the region’s largest tech firms, has the largest numeric deficit in housing production to jobs production over the past decade, which could be corrected in part by this adjustment.

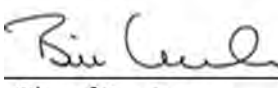
We appreciate the opportunity to bring forward this Alternative Methodology, and request that the Executive Board be provided an opportunity to duly consider this alternative in their forthcoming deliberations on the RHNA Methodology.

Respectfully,

  
Town of Danville  
Mayor Karen Stepper

  
City of Livermore  
Mayor John Marchand

  
City of Pleasanton  
Mayor Jerry Thorne

  
City of San Ramon  
Mayor Bill Clarkson

Attachments:

1. Summary of Representative Jurisdiction-Specific Allocations, Modified Methodology



Alice Fredericks  
Mayor

Holli Thier  
Vice Mayor

David Kulik  
Councilmember

Jack Ryan  
Councilmember

Jon Welner  
Councilmember

Greg Chanis  
Town Manager

Mayor Jesse Arreguín, President  
Association of Bay Area Governments (ABAG) Executive Board  
375 Beale Street, Suite 700  
San Francisco, CA 94105-2066

Re: Request for Use of Plan Bay Area 2050 Household Growth as Baseline  
for RHNA Methodology

Dear Board President Arreguín:

The Town of Tiburon respectfully requests the ABAG Executive Board to modify the RHNA methodology baseline to conform to the *Plan Bay Area 2050 Blueprint Household Growth*. The requested modification furthers the intent of statutorily mandated objectives and brings the proposed RHNA into conformity with Plan Bay Area 2050.

The methodology recommended by the Housing Methodology Committee (HMC) allocates too many units to suburban areas that are far from job centers, lack adequate transportation infrastructure, and are in areas of wildfire risk. The proposed HMC methodology will not further greenhouse gas reduction goals and is inconsistent with the growth patterns and policy objectives more carefully considered in the *Plan Bay Area 2050 Blueprint*.

Small jurisdictions are being set up for failure under the proposed methodology. The RHNA proposed for the Town of Tiburon is 8 times higher than the Town's current RHNA. The proposed RHNA amounts to more units than it has been allocated over the last four RHNA cycles combined. While the Town of Tiburon continues to make progress in achieving 100% of our current RHNA allocations, we have not accomplished this yet. Despite efforts to develop and adopt a compliant housing element and streamline our processing of development projects, the units have not been built by the private market. The Town believes that this is due in part to our location in the Bay Area relative to where jobs and job growth are and to limited public transportation making the required travel to jobs a challenge both logistically and in relation to goals of greenhouse gas reduction. The proposed RHNA, eight times the Town's previous allocation, carries the potential of significant penalties to our community because the production numbers are simply unrealistic.



Alice Fredericks  
Mayor

Holli Thier  
Vice Mayor

David Kulik  
Councilmember

Jack Ryan  
Councilmember

Jon Welner  
Councilmember

Greg Chanis  
Town Manager

In place of the HMC proposal, we recommend the Executive Board follow ABAG staff's July 2020 suggestion to use the *Draft Blueprint* for the RHNA methodology. The RHNA generated by Draft Blueprint uses each jurisdiction's share of *Household Growth* from 2010 to 2050 as the baseline. The Town supports the *Household Growth* baseline. While we prefer the methodology that includes job growth, the Household Growth baseline results in higher allocations for jurisdictions with significant jobs that are experiencing growth, including communities that have elected to be Priority Development Areas. This approach is consistent with long-range forecasts that have been used in ABAG's methodologies for previous RHNA cycles. (July 9, 2020, HMC Meeting #8, Item 6a, Attachment A, Page 3).

In addition, the State Housing and Community Development Department (HCD) has already approved using regional plan household growth as a baseline for 4 of the 8 approved 6<sup>th</sup> Cycle RHNA methodologies (with 3 others using baselines that factor in jobs, and one using a variety of factors). The advantages of this baseline are summarized by ABAG staff (July 9, 2020, HMC Meeting #8, Item 6a, Attachment A, Page 3):

- Simple and straightforward to implement and discuss (e.g., "the methodology aligns with growth predicted by Plan Bay Area 2050")
- Integrates transit, hazards, and market feasibility through strategies and modeling
- Better aligned with Plan Bay Area 2050
- Emphasis on current and future employment development patterns leads to RHNA allocations more focused in Silicon Valley, region's largest job center
- Higher RHNA allocations in high resource areas near major job centers – notably in the South Bay

The baseline proposed by HMC, in combination with additional factors and weights for allocating units by income category, result in allocations inconsistent with the Plan Bay Area Blueprint. For example, Tiburon is forecasted to grow very incrementally. In fact, by 2040, the number of households will reach 3900. This is a reduction from 2010 by ten units. Household population is projected to increase by less than 300 persons. The Town is assigned 620 housing units for the first eight years of the Plan period. Based on Tiburon's historic growth of approximately 10 units per year, the number assigned is unrealistic

On a larger scale, the Household baseline fails to proportionally assign units to urban jurisdictions that are experiencing growth in both jobs and housing, and where housing should be supported and built. For example, the proposed methodology allocates San Jose fewer units than San Francisco, even though Plan Bay Area forecasts



Alice Fredericks  
Mayor

Holli Thier  
Vice Mayor

David Kulik  
Councilmember

Jack Ryan  
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Jon Welner  
Councilmember

Greg Chanis  
Town Manager

that San Jose will create a half million jobs and San Francisco 182,000 jobs by 2050. In contrast, using the *Household Growth* baseline, San Jose receives more units than San Francisco in an amount that is equal to 1/3 of San Jose's forecasted household growth in 30 years.

Furthermore, Plan Bay Area shows Marin providing approximately 2% of the region's housing needs by 2050 and losing about 13,000 jobs. With the largest number of retirees, Marin is actually reducing jobs as employment and housing moves to areas with significant growth primarily in working age households. This data further supports the Town's position that use of either Plan Bay Area methodology or blueprint of Household Growth as a baseline provides a more accurate forecast of housing needs.

Finally, the Town requests that ABAG add Wildland-Urban Interface Fire Threat areas and FEMA floodways for the San Francisco Bay Region to the *2050 Plan Bay Area Blueprint*. Both Fire Threat areas and Floodways are available in the Metropolitan Transportation Commission Map Gallery. Currently, only CAL FIRE Very High Severity zones are factored into the Plan. The zones do not adequately represent wildfire and sea level risk in Tiburon.

Thank you for your consideration of our concerns as we all plan to meet housing needs for our communities that are realistic and consistent with the statutory mandates for the region.

Respectfully

Alice Fredericks  
Mayor, Town of Tiburon





The Town of  
Woodside

November 24, 2020

Association of Bay Area Governments and Metropolitan Transportation  
Commission's Public Information Office  
375 Beale St., Suite 800  
San Francisco, CA 94105

Re: Proposed RHNA Methodology and Subregional Shares

To Whom It May Concern,

I am writing in response to the 6<sup>th</sup> Cycle RHNA process and the proposed RHNA methodology. Initially, I want to thank ABAG for the time and effort it has put into this RHNA cycle so far.

P.O. Box 620005  
2955 Woodside Road  
Woodside CA 94062

The October 2020 Proposed Methodology and Subregional Shares Report (the "Report"), however, fails to take into account the unique challenges faced by jurisdictions within the Wildland Urban Interface (WUI). The Town of Woodside, as well as other areas of San Mateo County, is within the WUI, an acknowledgement of the threat of wildfire. This past August, the CZU Lightning Complex fires came within a few miles of the Town of Woodside and, as a result, many of my neighbors received evacuation orders. Wildfire remains one of the biggest threats to Woodside and the Town is taking proactive measures to manage fire fuels within its borders. The Report, however, makes only passing reference to the threat from wildfires and does not adjust the RHNA allocations for communities most at risk.

To properly plan for safe and affordable housing, the RHNA methodology must take into account wildfire threat and make accommodations for those at-risk communities. Woodside remains committed to planning for its fair share of housing, but the RHNA allocation process must consider the unique challenges associated with wildfire risk. Current and future residents of Woodside and communities like it would not be served by substantial new development in wildfire prone areas. In short, a one-size-fits-all approach does not work. I implore ABAG to more carefully consider how its methodology will affect communities with high wildfire risk and make necessary accommodations.

650-851-6790  
Fax: 650-851-2195  
townhall@woodsidetown.org

Thank you for your attention to this matter. Please do not hesitate to contact me with any questions or concerns

Sincerely,

A handwritten signature in blue ink, appearing to read 'Ned Fluet', with a stylized, flowing script.

Ned Fluet  
Mayor

cc: Town Council



## Fwd: Bay Area housing plan

Sun 10/25/2020 4:23 PM

To: Regional Housing Need Allocation <rhna@bayareametro.gov>

**\*External Email\***

To ABAG;

I note that the comment period for ABAG's housing plan has opened, and it appears that requirements for additional housing assume continued growth of jobs etc. those projections result in nearly impossible numbers of new housing and if not planned for, the consequence of that failure will be to open the floodgates to uncontrolled new construction which will urbanize the entire region.

An alternative would be to mandate job shrinkage to fall into line with the ability to create housing to accommodate those jobs.

I don't see any evidence that there was any consideration of this alternative solution.

Unending growth is not inevitable.

With respect,  
Daniel Moos

From: Beth Strachan <[REDACTED]>  
Sent: Monday, November 2, 2020 9:07 AM  
To: Fred Castro [REDACTED]  
Subject: Proposed RHNA Methodology and Subregional Shares

\*External Email\*

I understand ABAG's Methodology Committee adopted a formula to determine allocation of units per municipality per the RHNA. I also understand that methodology, as it stands, would result in an allocation of 4,900 units for the City of Alameda. That is untenable -- it would require a huge increase in units with no infrastructure to support it. (You might know that ingress/egress for the city is limited and already problematic.) Please consider a different methodology that takes into account the physical reality of places.

Thank you!  
Beth Strachan  
[REDACTED]

## New housing

Antonia Halliwell <[REDACTED]>

Tue 10/27/2020 3:54 PM

To: Regional Housing Need Allocation <rhna@bayareametro.gov>

**\*External Email\***

Hello,

Building 1000's more homes in the Bay Area, such as in Palo Alto and Mountain View is absurd. Traffic is already horrendous, resources such as water will be scarce, and air pollution will be even worse. Please stop destroying what used to be nice areas for families to live such as Palo Alto, Los Altos, and Mountain View.

Now that more and more employees will be working from home, they can move out of the area, pay less in rent or home ownership costs, and escape the ridiculously high taxes in California. Many wise residents are fleeing California already.

Good day,

Toni Halliwell

## Proposed RHNA Methodology and Subregional Shares

marty cerles <m[REDACTED]>

Tue 10/27/2020 4:48 PM

To: Regional Housing Need Allocation <rhna@bayareametro.gov>

**\*External Email\***

Hello,

I believe that the number of housing units assigned to all Bay Area Counties needs to be dramatically increased, in order to make up for the severe deficit we currently face.

Thank you,

## Housing Methodology

Irv Brenner <[REDACTED]>

Tue 10/27/2020 9:34 PM

To: Regional Housing Need Allocation <rhna@bayareametro.gov>

**\*External Email\***

We live in a semi-arid climate wherein water conservation should be mandatory even during wet years. Yet your housing figures don't appear to have factored in the prospect of ever increasing droughts. The extreme effects we endured during previous dry spells will be overshadowed by even longer and more severe ones as predicted by climatologists. Our very survival is linked to water and yet you continue to encourage more population density. Why?

Irv Brenner  
[REDACTED]  
[REDACTED]



This email has been checked for viruses by Avast antivirus software.  
[www.avast.com](http://www.avast.com)

## Roll back Palo Alto's ABSURDLY High Housing targets

Jo Ann Mandinach <[REDACTED]>

Thu 10/29/2020 12:14 PM

To: Regional Housing Need Allocation <rhna@bayareametro.gov>

\*External Email\*

Roll back the absurdly high housing targets until you can see the effects of the pandemic. People are leaving the Bay Area in droves. San Francisco rents are down more than 30% and people leaving can't even find movers!

Palo Alto has 3 or 4 times as many commuters as residents. We've had our parked car run into by these ditzes three times, totalling our car once. YOUR agenda is costing me a fortune in money for car repairs and time wasted trying to back out of my driveway due to the congestion. UTTER IDIOCY.

Between the fires, the water shortages, the rolling blackouts, the gridlock etc. the area can't support more people or more jobs.

STOP the office developers from adding 4 times as many jobs as housing because this will only go on for all eternity.

Institute rent control so we don't create more homeless.

ENOUGH! Why live here if we can't go anywhere to hear a concert, see a play, etc. because of the ridiculous gridlock and the amount of travel time it takes. Stop telling me to take public transit when you're putting more housing on the public transit parking lots!

Most sincerely,

Jo Ann Mandinach  
[REDACTED]

## Proposed RHNA Methodology and Subregional Shares

Alfred Twu [REDACTED] >

Sun 11/1/2020 1:54 PM

To: Regional Housing Need Allocation <rhna@bayareametro.gov>

**\*External Email\***

Looks great! Appreciate the work and let's get this approved!

Alfred Twu

[REDACTED]

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~~~ ~~~





November 9th, 2020

Re: Agenda item #13 Palo Alto Forward Supports the RHNA Criteria and Allocation

To: Mayor Adrian Fine, City Council Members, CC Planning and Transportation Commission, CC Working Group

Dear Mayor Fine and Council members,

Palo Alto Forward is a non-profit organization focused on innovating and expanding housing choices and transportation mobility for a vibrant, welcoming, and sustainable Palo Alto. We are a broad coalition with a multi-generational membership, including new and longtime residents.

We have followed the Bay Area RHNA development process closely, including ABAG's methodology committee discussions. As you know, the Executive Board adopted their methodology on October 15th, confirming that Palo Alto's regional housing goal will include 10,058 new homes. As Palo Alto's [staff memo on notes](#) on 8/10/2020, roughly half of the regional allocation is not related to growth but to statutory state requirements focused on helping existing residents, some of which are new to this cycle. The new factors include reducing the number of overcrowded and cost-burdened households (30% or more of income spent on housing), moving toward a more "normal" vacancy rate, and replacing demolished units as a means to not create a further deficit of housing units.

More notable however, is the allocation methodology. Palo Alto Forward supports the criteria outlined, prioritizing housing in communities that are high opportunity areas and in communities with good public transit and car commuting access to large job centers. While the allocation appears daunting, increasing housing in resource rich cities like ours is a pragmatic and equitable way to allocate new homes. If we do not do our fair share these homes will be allocated to neighborhoods like East Palo Alto, Belle Haven, and North Fair Oaks, further exasperating inequity and the jobs-housing imbalance.

Achieving these goals will be hard for all communities but the Housing Element requirement is to identify feasible sites, zoning and policies to meet the requirements. Because Palo Alto didn't make appropriate modifications to zoning and policies during our current cycle, we met just [28% of our RHNA allocation](#). To that end Palo Alto Forward encourages the council and staff to seriously plan for the Housing Element update and the North Ventura Coordinated Area Plan (NVCAP), both of which will require thoughtful and innovative elements no matter what Palo Alto's allocation. NVCAP is uniquely positioned as a great site for new housing and our

decisions there will demonstrate how seriously we're working to meet our local and regional housing goals. We can meet these goals, but only if we plan for it.

Sincerely,  
Palo Alto Forward Board

## Moratorium on the RHNA Numbers

Roberta Phillips <[REDACTED]>

Sun 11/8/2020 11:06 AM

To: Regional Housing Need Allocation <rhna@bayareametro.gov>

**\*External Email\***

Dear Sir

I am a resident of Los Altos California for the past 30 years.

The RHNA numbers given to Los Altos are impossible to meet. The City has approved projects, but because of the Covid-19 pandemic, many are not being built. Developers are running onto financial trouble .

As a regular citizen, you may not listen to me, but I hope you will. The threats from your agency is not helping, but only adding stress to oor lives.

I strongly recommend a moratorium on all RHNA requirements until the Covid -19 pandemic is over.

Sincerely

Roberta Phillips

[REDACTED]

## RHNA units in Palo Alto

steve rutledge <[REDACTED]>

Sun 11/8/2020 6:10 PM

To: Regional Housing Need Allocation <rhna@bayareametro.gov>

**\*External Email\***

Hello, and thank you for this comment period. I have lived in Palo Alto since 1980. In that time period, a once sleepy middle class town has morphed into an expensive urban environment with bad traffic problems. Like about half of people who live in Palo Alto, I can't afford a house in the Bay Area and am a long-term renter. There is no way that Palo Alto can fit 10,000 additional housing units without turning the city into a crowded urban jungle. This is totally unacceptable. If I had wanted to live in San Francisco or New York City, I would have moved there. I love that our neighborhood is quiet and safe, not overdeveloped. Just because previous Palo Alto City Council members voted to allow big office developments for techies does not give these people the right to live here. If I get a job in Malibu or Woodside, do those towns also have an obligation to build a housing unit for me? That's absurd. Since we do not vote for members of ABAG, I don't believe you have the right to destroy the character of our city. Thank you.

Julie Beer  
[REDACTED]

## questions for Saratoga City housing allocation in RHNA

Tsing Bardin <[REDACTED]>

Tue 11/10/2020 5:31 PM

To: Regional Housing Need Allocation <rhna@bayareametro.gov>

Cc: [REDACTED]

\*External Email\*

To Whom It May Concern:

I am a resident of Saratoga, CA. I have several questions about housing allocation in Saratoga.

1) I am trying to understand the methodology used to allocate the 2100 total housing units for Saratoga to be provided by Spring 2021. The current RHNA for 2015-2023 allocates 439 total units. According to the RHNA for the Bay Area, the total number of new housing units needed in the Bay Area is 441,176. This compares to 187,990 for the prior planning period of 2015-2023 representing a 234% increase in future housing. Saratoga's new allocation is 2100 versus the 439 for the prior planning period, which is a 478% increase in future housing. Why is this increase so high? The Association of Bay Area Governments (ABAG) is required to follow several [objectives from the State](#) when deciding each jurisdiction's share of the total Bay Area housing needs allocation. These include:

- *Promoting the relationship between jobs and housing, including improving the balance between the number of low-wage jobs and the number of affordable housing units in each jurisdiction.*

Since Saratoga City is a semi-residential rural city with few job opportunities, why are the total allocations so high? From what basis are these total housing numbers derived? Could you please explain in layman's terms your methodology for arriving at the 2100 total housing unit number?

2) Of these 2100 units, the Above Moderate Income allocation is 882. The prior planning period allotted 93 designated Above Moderate Income units. Why is the jump from 93 AMI units to 882 (a 948% increase) so high? Again, the Association of Bay Area Governments (ABAG) objectives include:

- *Reducing the number of units needed in an income category when a jurisdiction has an already high share of households in that income category.*
- *Furthering fair housing by reducing patterns of segregation, addressing disparities in housing needs and access to opportunity, transforming racially and ethnically concentrated areas of poverty*

Saratoga is already predominantly Above Moderate Income level. By disproportionately increasing the level of AMI housing, this would increase the segregation of high and low end housing. Again, could you please explain the methodology behind these numbers? I would appreciate an explanation in simple language so a layperson could understand.

Since the public comment period on methodology is ongoing until Nov. 24, 2020, I hope that you will be able to clarify some of these questions for me.

Thank you for your attention.

Tsing Bardin

If you need to get in touch with me, here is my contact information:

[REDACTED]

[REDACTED]

## Housing units

Marcia Fariss <[REDACTED]>

Wed 11/11/2020 8:57 AM

To: Regional Housing Need Allocation <rhna@bayareametro.gov>

**\*External Email\***

You might want Saratoga to build 2100 new housing units but this town is already built out! There is no room for this amount of housing. And, we're not a transportation hub nor are we an employment center.

The number of units you are wanting us to build is unrealistic for a community of our size. We have a minimal services government, insufficient infrastructure to support 2100 housing units, no commercial areas, no room in the schools and certainly no room to build!

You need to be realistic for our community and others like us; there is simply no way to provide that amount of housing. And, please keep in mind that COVID 19 has reminded us all that high density, (and mass transit) are prime breeding grounds for contagious diseases.

Thank you for reconsidering your unrealistic housing demands for this city.

Marcia Fariss  
Saratoga, CA



## More Homes??

Bill-Jo Taylor <[REDACTED]@com>

Wed 11/11/2020 1:11 PM

To: Regional Housing Need Allocation <rhna@bayareametro.gov>

**\*External Email\***

I vote NO on more homes. We do not have enough space here in Palo Alto to be able to afford another massive buildup of homes. The quality of life is already diminished by way of the overcrowding and lack of open space. Please, do not continue to overcrowd what little space we have left.

Bill Taylor  
650-494-0921 [REDACTED]

Bay Area Association of Governments  
Bay Area Metro Center  
375 Beale Street, Suite 800  
San Francisco, CA 94105

***RE: Proposed RHNA Methodology and Subregional Shares***

I am writing to you today as a resident of the City of Monte Sereno to express my opposition to the proposed RHNA methodology and subregional shares for my city. Monte Sereno does not fit the proposed Bay Area allocation for several reasons:

- 1) Monte Sereno has no jobs base. In other words, Monte Sereno is ***all*** residential and provides a housing surplus to surrounding area employment centers. Monte Sereno is effectively already a huge housing supplier and this point is not being recognized in the allocation numbers.
- 2) Monte Sereno has no bus stops or rail stops. Adding housing to Monte Sereno actually ***increases vehicle miles traveled*** (VMT), which increases greenhouse gasses. This is diametrically opposed to the goal of trying to provide housing closer to transit routes to reduce GHG's.
- 3) Monte Sereno has no commercial districts. Until recently, Monte Sereno had only one opportunity to add multifamily housing at Montalvo Oaks. This opportunity was used up during the last RHNA cycle. There are no affordable, practical, or conceivable options at this time, other than continued support of ADU's.
- 4) Up to 30%-40% of Monte Sereno is located in a Wildfire Urban Interface area. Roads are narrow and hilly and encouraging development in such areas would be detrimental to the health and safety to residents in the event of a wildfire like Chico or Oakland Hills. WUI and other severe fire zones should be excluded from consideration of housing allocation numbers.
- 5) Monte Sereno's population has actually decreased 4.1% since the last U.S. Census. It's hard to argue demand for housing is actually increasing in Monte Sereno based on demographic trends.

While I support efforts to increase much needed housing in the Bay Area, it is important to understand that Monte Sereno just doesn't have the physical resources to add housing nor does it have the financial resources to pay the hefty fines that will undoubtedly occur when we are unable to achieve the proposed housing goals. For Monte Sereno to participate in meeting the goals of the next RHNA cycle, there must be alternative allocation solutions or exemptions provided to help this small hillside community play a meaningful part.

Respectfully,

Liz Lawler  
Resident, [REDACTED]



## Saratoga number of housing units allocation

Yi Yahoo Mail <[REDACTED]>

Wed 11/11/2020 7:33 PM

To: Regional Housing Need Allocation <rhna@bayareametro.gov>

**\*External Email\***

It appears the plan will add over 2100 housing units in Saratoga in coming years. This is a over 20% increase in the housing units (Saratoga has now about 10000).

Saratoga doesn't have many offices, not much of public transportation And road capabilities as well. With the new housing units, it will make the already congested traffic even worse.

The number doesn't make any sense, it should be assigned a much lower number of housing units.

Yi

## public comment on the RHNA allocation equation

Andrey Tovchigrechko [REDACTED] >

Thu 11/12/2020 1:53 AM

To: Regional Housing Need Allocation <rhna@bayareametro.gov>

**\*External Email\***

Dear RHNA committee,

I want to comment on the methodology. Please add my comment to the records.

I think you are missing the most important factor. To build so much housing realistically, you first need a place to build it on. Cities differ greatly in the amount of available land. Some can grow freely. Others are limited by their geography, and they cannot build much new housing. You can, of course, pretend that this is not so. But then the numbers that you are planning will not be achieved. Isn't it better to do a calculation right away so that it can really be achievable, at least theoretically?

I live in Saratoga. It is almost completely built up. There are several plots, on each of which one can build several dozen housing units. But this is the limit.

Perhaps I shouldn't worry about the SB35. Because we simply do not have a place for construction, developers will not come to us. But I still want to get involved in planning for BayArea 2050, and I love seeing a quality job.

I think you should add the parameter of free land available for construction or the possibility of city expansion as one of the factors in your equation. Because this is an absolutely fundamental factor. And then your plans will become more attainable.

Thank you.

Best regards,  
Andrey Tovchigrechko

[REDACTED]

## Comments from Livable Mountain View on Plan Bay Area RHNA numbers

Cox, Robert <[REDACTED]>

Thu 11/12/2020 10:04 AM

To: Regional Housing Need Allocation <rhna@bayareametro.gov>

Cc: louise katz [REDACTED]

**\*External Email\***

Members of the Regional Planning Committee of the Association of Bay Area Governments,

Thank you for the opportunity to comment on the setting of the RHNA numbers for Bay Area next RHNA cycle.

It has come to our attention that due to the recent pre-COVID-19 housing affordability crisis, ABAG has deemed it appropriate to greatly increase the RHNA allocations for cities in this area to multiples of the numbers that were required in the previous eight year cycle. While we acknowledge that this may have been worthy of serious consideration before the COVID-19 crisis, we believe that the changes in the way that technology companies are doing business merits reconsideration of this push to greatly up-zone our Bay area communities. In particular:

1. The COVID-19 crisis has taught our technology companies that remote work is not only possible but productive. Technology leaders like Google are now seriously considering that a hybrid work from home and remote work environment for their employees will be the best way to move forward after the COVID-19 crisis is completed. (Reference 1) Facebook CEO Mark Zuckerberg has predicted that as many as half of his company's employees could shift to remote work in the next 5-10 years. (Reference 2) The Bay Area now leads the USA as the area with the largest excess of sub-leasable office space. (Reference 3)
2. Meanwhile, as tech workers exit the Bay Area, the demand for apartments has plummeted. In Mountain View, for example, rents for single bedroom apartments have fallen 38% since last year, while rents for two-bedroom apartments have fallen 32%. (Reference 4). All of this is happening while new apartment complexes, the construction of which began before COVID-19, comprising thousands of new units are being built. This will further depress rents once these new units come online in 1-2 years. (Reference 5)

When and how to up-zone of our communities is one that should be undertaken with careful consideration of current and potential future market conditions. Once a city up-zones an area, it could be subject to lawsuits from landowners who perceive a subsequent downzoning as a "taking" of property rights. We therefore recommend that ABAG Regional Planning Committee proceed cautiously and delay the implementation of its proposed RHNA increases until the aftereffects of the COVID-19 crisis can be evaluated effectively.

Finally, we find no addendum in the attachments which documents the cost and weighs the ability of Mountain View to provide needed infrastructure to support such a massive up-zoning. This includes additional school facilities, the capacity and delivery of water, sewers, and increased police and fire protection. Mountain View is a city of only 13 square miles and is being asked to re-zone to grow 50% in the next 8 years. All this at a time when its population is substantially decreasing.

Thank you for your consideration in this important matter.

Robert Cox and Louise Katz

For the Steering Committee of Livable Mountain View

<https://www.livablemv.org/>

Disclaimers:

Livable Mountain View is an independent Mountain View organization not directly affiliated with Livable California.

Robert Cox is the Chair of Mountain View's Environmental Planning Commission and is a co-author of this letter as a member of Livable Mountain View Steering Committee. He is not speaking officially on behalf of the

Commission in this letter.

References:

1. <https://www.forbes.com/sites/jackkelly/2020/09/28/google-ceo-sundar-pichai-calls-for-a-hybrid-work-from-home-model/?sh=594b84d4e9cf>
2. <https://www.vox.com/recode/2020/5/21/21266570/facebook-remote-work-from-home-mark-zuckerberg-twitter-covid-19-coronavirus>
3. <https://www.timesheraldonline.com/2020/10/05/real-estate-bay-area-office-sublease-space-soars-tech-coronavirus/>
4. <https://www.zumper.com/rent-research/mountain-view-ca>
5. <https://www.mountainview.gov/depts/comdev/planning/activeprojects/list.asp>



## Re - RHNA allocation. Alameda is at emergency traffic levels and cannot sustain more population

Margie Siegal [REDACTED] >

Thu 11/12/2020 12:43 PM

To: Regional Housing Need Allocation <rhna@bayareametro.gov>

**\*External Email\***

I am a resident of Alameda. I am very concerned by the continued push to enforce unneeded and unnecessary construction

- (1) Population of California is at a standstill. People are moving out of the Bay Area.
- (2) New construction in the Bay Area is extremely expensive and there is no money for public housing
- (3) There are only FOUR ways in and out of Alameda. During rush hour, all four entrances/exits are at max capacity. In the event of a major fire, earthquake or tsunami, we will not be able to evacuate. People will die.
- (4) I have seen maps showing that in thirty years, significant areas of Alameda will be under water

--

Margie Siegal

## 2023 housing numbers

Evert Wolsheimer <[REDACTED]>

Fri 11/13/2020 7:02 PM

To: Regional Housing Need Allocation <rhna@bavareametro.gov>

Cc: Evert Wolsheimer [REDACTED]

**\*External Email\***

Dear ABAG,

We just read the new requirements for the 2023-2033 period.

I would like to invite you to come out from behind your desk and stop working on those spreadsheets for a day and visit Monte Sereno.

I have lived here for 18 years, been on the planning commission and on the City Council, so I'm fairly familiar with the City.

There are NO open lots in Monte Sereno. There are no strip malls to tear down and replace with housing. The City is 100% built out. Completely full. So when you tell us we have to build 192 units, we would appreciate your help in finding space to build them.

Please advise us what to do. I'm pulling out what's left of my hair when I see your requirements.

Respectfully,

Evert Wolsheimer

[REDACTED]

## Proposed RHNA Methodology

Hinderberger Phil [REDACTED] >

Sat 11/14/2020 10:19 PM

To: Regional Housing Need Allocation <rhna@bayareametro.gov>

**\*External Email\***

RHNA Methodology assigns the number of Affordable Housing units needed by City and County.  
Please advise

Is the territory of a city for purposes of assigning Affordable Housing unit allocation its designated legal boundaries, LAFCO assigned zone of influence or some other definition.

Does a city that has constructed Affordable Housing units outside its jurisdictional territory still get credit against its Affordable Housing unit requirements?

Thank you.

Philip R. Hinderberger

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

Proposed RHNA Methodology and Subregional Shares

Cathy Benediktsson [REDACTED] >

Mon 11/16/2020 7:37 AM

To: Regional Housing Need Allocation <rhna@bayareametro.gov>

\*External Email\*

You are not elected by the cities.  
Just STOP interfering in local jurisdictions.

I object and reject to the methods and shares completely.

Chris

<><      ><>  
  
                 <><      ><>      ><>  
  
\_\_\_\_\|/\\_\_\_\_\|/\\_\_\_\_\|/\\_\_\_\_\|/\\_\_\_\_\|/\\_\_\_\_\|/\\_\_\_\_

## Proposed RHNA Methodology and Subregional Shares

Drew Dara-Abrams <[REDACTED]>

Mon 11/16/2020 9:25 AM

To: Regional Housing Need Allocation <rhna@bayareametro.gov>

**\*External Email\***

Dear members of the ABAG Regional Planning Committee,

I'm writing in to support the proposed RHNA methodology and subregional shares plan that promotes equity.

While I do not understand all of the specific factors that ABAG leaders, staff, and consultants have been weighing as part of this process, I appreciate that it is a complicated process that needs to take into account many different factors. I am pleased to see that the proposed plan emphasizes equity concerns and focuses development on the inner Bay Area and cities that will benefit most from in-fill (while still asking all counties and cities throughout the Bay Area to add more housing).

My family and I live in Alameda, where we appreciate its walkable neighborhoods and business districts and its centrality to job opportunities throughout the inner Bay Area. More households should have the opportunity to live as we do. It will be good for overall carbon emissions, it will be good for our communities, it will be good for the residents and workers who are most impacted by high housing costs, and it will not degrade or take away from what we like about Alameda.

Despite some vocal opponents in smaller newspapers and on mailing lists who appear to be playing a mean "zero sum" game to argue their RHNA allocation onto other jurisdictions, I think there are actually a lot of folks and a lot of elected leaders who understand the need to fairly build more housing throughout the Bay Area, with all jurisdictions taking on the responsibility—and the opportunity—for more housing. Thank you for managing this process and please take this as a public comment in support of the proposed methodology and subregional shares.

Sincerely,  
Drew Dara-Abrams  
Alameda, CA

**From:** slevy@ccsce.com <[REDACTED]>  
**Sent:** Tuesday, November 17, 2020 12:49 PM

**To:** Ursula Vogler [REDACTED]; Dave Vautin [REDACTED]  
**Subject:** Re: Plan Bay Area 2050 Implementation Plan: Housing and Economy

**\*External Email\***

H

I could not make the mural work so here are my thoughts

While PBA has robust housing goals, this process was completed before the RHNA and methodology committee allocation recommendations.

As you know there is local resistance.

Major zoning changes at the local level or by state legislation are required to implement the housing production strategies with respect to total units, use of public lands, repurposing malls and siting and making feasible units for low income residents.

I can see MTC in partnership with HCD playing a couple of helpful roles with regard to building public understanding and, perhaps hopefully acceptance of the RHNA/PBA housing goals.

These include

--HCD explaining existing enforcement tools and their intent to enforce

--MTC supporting additional enforcement tools in the 2021 session and beyond

--MTC and HCD holding widespread public forums and going to select city councils to explain the new housing element requirements including non reuse of sites from old HEs and non feasible sites.

--MTC convening best practice webinars regarding zoning changes to implement use of public lands and repurposing of malls, etc.

--MTC going around the region explaining the (I think great) allocation criteria.

ith regard to housing for low and moderate income residents I can see

--MTC following through with negotiating a RHA funding plan perhaps in collaboration with foundations and businesses.

--MTC supporting state bonds

--MTC supporting a state bond funded economic recovery plan that 1) funded low income housing and also funded efforts that support the transportation and climate goals of PBA.

--MTC supporting state legislation to drop the majority for local housing bonds to 50 or 55%.

--MTC convening best practice webinars with regard to the thorny challenge of middle income housing and supporting state legislation for affordable housing by design--that failed last year but seems needed to meet the PBA strategy successfully.

Although it was not "legal" in this webinar, I do think with the new RHNA that PBA does not have sufficient strategies by a very wide margin.

And though it is a selected strategy I think moving jobs to outlying areas (something companies can do now and do sometimes) is a poor idea and has no chance of success. Companies will locate here they think best for access to labor force and other criteria.

The allocation committee got it right--help low income folks live in high opportunity areas and in areas with access to existing jobs.

I come from a city that fits both criteria and may come whining to MTC to put Palo Alto's housing allocation in areas less suitable.

Steve

I couldOn 2020-11-13 17:06, Ursula Vogler wrote:

Dear Partners and Stakeholders:

Thank you all for participating in the Plan Bay Area 2050 Implementation Plan workshop for the Housing and Economy elements of the Plan. This workshop will help inform the development of tangible actions that ABAG, MTC, and you can take to advance the adopted strategies in the Plan Bay Area 2050 Final Blueprint. Please find the attached documents for review prior to the meeting next Tuesday:

1. Participant Guide
2. Final Blueprint Strategy Definitions (4-page briefing document)
3. Housing and Economy Workshop Slide Deck



Please note we will be using the Mural program during this workshop; **please review the Participant Guide in advance to ensure you're ready to engage interactively via Mural!** For best results, we recommend that you use a desktop or laptop with a mouse. If you have difficulties with the technology during the workshop, we will provide the opportunity for you to give verbal input.

Zoom link for workshop: <https://bayareametro.zoom.us/j/89468056443?pwd=Q2VVbG9wOWhsMDBLRklzbWJZNk15Zz09>

Meeting ID: 894 6805 6443

Passcode: 110079

One tap mobile: +16699006833,,89468056443# US (San Jose)

**Due to limited capacity for this workshop, if you are no longer able to attend, please let me know.**

Thank you, and we look forward to seeing you on Tuesday.

Thank you,  
Ursula for the Plan Bay Area 2050 team

**From:** [David Howard](#)  
**To:** [Fred Castro](#)  
**Subject:** Nov 12 meeting - opposition to housing allocation methodology  
**Date:** Tuesday, November 10, 2020 8:52:39 AM

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**\*External Email\***

Please include this e-mail as input to the upcoming November 12 Regional Planning Committee, item #6. (And wherever else appropriate.)

I'm sure ABAG is aware of the published criticisms of it's housing allocation methodology, specifically a recent study that came out that details how ABAG is double-counting housing needs.

"Do the Math: The state has ordered more than 350 cities to prepare the way for more than 2 million homes by 2030. But what if the math is wrong?"

I'm opposed to ABAG using its current methodology which seems to double-count.

I'm also opposed to ABAG senselessly allocating so many units to Alameda, which can practically be built ONLY in serious flood and liquefaction hazard zones. I'm opposed to ABAG's single-mindedness about housing allocation, with no consideration for how transportation infrastructure is missing or can be built to support the housing.

David Howard  


From:

  
[Fred Castro](#)

Subject:

Item 6a on Nov. 12, ABAG Regional Planning Committee Agenda Public Hearing on RHNA Proposed Methodology

Date:

Wednesday, November 11, 2020 3:39:04 PM

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**\*External Email\***

Dear Regional Planning Committee Chairperson Mitchoff and Committee Members:

The purpose of this letter is to express my concern with the ABAG Executive Board's tentative adoption of a methodology that does not include natural hazards in the allocation formula. On page 5 of the Oct. 15 report of the Executive Director he comments on the decision to omit this factor from the methodology with the parting sentence, "Local governments will have the opportunity to consider the most appropriate places for planning for housing in lower-risk areas when they update the Housing Elements of their General Plans." That may be true of most cities in the Bay area, but it is certainly not true of my City, Alameda.

The ABAG Natural Hazard map at

[https://abag.ca.gov/sites/default/files/factor\\_o1\\_natural\\_hazards\\_v2.pdf](https://abag.ca.gov/sites/default/files/factor_o1_natural_hazards_v2.pdf) indicates that Alameda is among those cities with the lowest percentage of urbanized area outside of a hazard zone (less than 50%). It is obvious that the primary hazard that causes this is sea level rise. See

<https://www.nbcbayarea.com/investigations/unlike-any-disaster-we-have-ever-seen-says-state-agency-about-rising-seas-in-bay-area/2236314/> which indicates the current projections for year 2100 are 66 inches with a storm surge level of 84 inches. A review of flood visualization maps shows that the portion of Alameda that is outside of a hazard zone is the center of the island which is already a very densely built up area. Therefore Alameda has ***no choice*** but to build new housing directly in the flood hazard zone. In fact, the 4000 plus new units that have been approved in the present cycle are primarily in the flood hazard zone.

Add to all of the above the fact that Alameda is an island with very limited ingress /egress over antiquated tubes and bridges and the fact that most of our police and fire first responders live off the island.

None of the above is intended to argue that Alameda should not have a significant RHNA. We are a high resource City that fits very well into the equity factor. However, a fair allocation demands that our negative natural hazards factor should be an element of the final allocation.

To fail to do so endangers not only present residents but also those who will be occupying the new housing.

Sincerely,

Paul S Foreman

**From:** [REDACTED]  
**To:** [Fred Castro](#)  
**Subject:** comments re the City of Alameda RHNA  
**Date:** Sunday, November 8, 2020 10:17:42 PM

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**\*External Email\***

Hi, Our local Alameda newspaper provided this email for sending comments about ABAG/RHNA numbers. I am writing out of concern regarding the current allocation formula and the untenable number of housing units it would require to reach the affordable housing goals. I am sure you have heard this concern from many others and specifically concerns due to rising water levels, liquefaction, traffic, lack of infrastructure to support what would seem to be a 42% increase in units over current units/units in construction/planned already. Sadly our city council appears uninterested in applying for a variance from the current formula to the alternative proposed by Contra Costa County cities. I am requesting that you give serious consideration to citizen concern in your Methodology Committee and Executive Board meetings and decision-making process. While I understand that housing is lagging behind need, I think it is past time to shift the entire paradigm. I think, given the advent of remote working, and the huge income inequality between the bay area/south coast and the rest of the state, that regional job and housing hubs should be planned and developed throughout these low income areas. This would take pressure off of already over built urbanized areas that lack supportive infrastructure and can hardly imagine how to pay for said infrastructure. It will be much less costly to develop in other areas.

Thank you,  
Vali Ebert

**From:** [Edward Sing](#)  
**To:** [Fred Castro](#)  
**Cc:** [REDACTED]  
**Subject:** Item 6a on Nov. 12, ABAG Regional Planning Committee Agenda Public Hearing on RHNA Proposed Methodology  
**Date:** Wednesday, November 11, 2020 8:39:42 PM

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**\*External Email\***

It would be greatly appreciated if you can pass this email on to the Regional Planning Chairman and Committee Members.

**Dear Regional Planning Committee Chairperson Mitchoff and Committee Members:**

I would like to add my support to Paul Foreman's comments to you, below regarding Item 6A of your November 12th Planning Committee meeting - in addition to the following:

One concern that arose during discussions of the recently defeated Measure Z in Alameda (which would have removed voter approved development restrictions in Alameda) is the susceptibility of Alameda to multiple natural hazards (earthquakes, liquefaction, sea level rise, tsunami surges). Although these hazards exist for many cities adjacent to San Francisco Bay, Alameda is unique in that egress from Alameda should such natural hazards occur and emergency response access to the island is limited to aging bridges and tunnels which are already overwhelmed during normal rush hour conditions. Adding RHNA 3900 housing units in the period from 2023 to 2030 would require building another 12000 (approximate) market rate units in order to achieve the RHNA target. This would increase the total number of housing units in Alameda by over 30% (approximate), burdening an already stressed infrastructure as well as exacerbating ingress onto and egress off of the island during emergency conditions. Such concerns should be reflected in the process of determining RHNA requirements for Alameda.

The RHNA requirements stress proximity to major city centers. This might have been a valid factor pre-Covid but now, it has been demonstrated that teleworking has greatly decreased the need for proximity to the major city centers and will inevitably create a need for more jobs in professional as well as service industries in more outlying cities. Such changing employment and housing needed characteristics should be reflected in the process of determining RHNA requirements for Bay Area cities. Even discounting potential changes in employment centers due to Covid, giving more weight to proximity to major business centers is somewhat tenuous, as pre-Covid, over 400,000 commuters used mass transit to commute from outlying cities into the major business centers.

I fully support the concept of social equity. However, I ask that you consider Paul Forman's and my concerns and viewpoints regarding the proposed RHNA requirements for the City of Alameda.

Thank you,

Edward Sing  
Alameda Resident

[REDACTED]

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**From:** Kevin Ma [REDACTED]  
**Sent:** Tuesday, November 17, 2020 11:03 PM  
**To:** Regional Housing Need Allocation  
**Subject:** Proposed RHNA Methodology and Subregional Shares

**\*External Email\***

Dear ABAG Board and Staff,

As a resident of the Bay Area, I support the plan brought forward by the Housing Methodology Committee, as it has taken the input of a diverse set of opinions and backgrounds.

I have heard some discussion on whether the higher numbers for unincorporated areas would conflict with anti-sprawl measures. I believe that ABAG should instead better divide unincorporated areas into smaller chunks, perhaps by Census-Designated places. For example, in Santa Clara County, we would be better separating it to Stanford, Alum Rock, San Martin, and other segments so as not push development into areas like Coyote Valley. This also alleviates inter-city fights over who'd get the additional numbers to make up for unincorporated reductions.

What I do not wish to see are major reductions in resource-rich areas. The proposed RHNA numbers are higher than previous cycles because they recognize the housing crisis we find ourselves in; Plan Bay Area 2050 was initially going to provide an even higher RHND after all. Previous planning failures do not justify shirking our responsibilities to current and future generations to provide an affordable, equitable, sustainable place to live. And we must be affirmatively furthering such actions.

Sincerely,  
Kevin Ma  
[REDACTED]



215 Julia Ave  
Mill Valley, CA 94941

November 18, 2020

Mayor Jesse Arreguin, President  
Association of Bay Area Governments (ABAG) Executive Board  
c/o ABAG & MTC Public Information Office  
375 Beale Street, Suite 800  
San Francisco, CA 94105  
RHNA@bayareametro.gov

Re: Proposed RHNA Methodology

Dear President Arreguin and ABAG Executive Board Members,

Sustainable TamAlmonte submits the following comments on the proposed Regional Housing Need Allocation (RHNA) methodology, **Option 8A**, recommended by the ABAG Housing Methodology Committee. We respectfully request that you reject **Option 8A** and instead approve an Alternative RHNA Allocation Methodology Option. A revision to the allocation methodology is necessary to meet RHNA statutory objectives and for the Regional Housing Need Allocations to be consistent with the Plan Bay Area 2050 Blueprint.

## I. PROBLEMS WITH THE OPTION 8A RHNA ALLOCATION METHODOLOGY

The **Option 8A** RHNA Allocation Methodology fails to fulfill the following RHNA statutory objectives and Plan Bay Area 2050 Draft Blueprint purpose, guiding principle, objectives, strategies, and policy:

- The Second Statutory Objective for RHNA is; “Promoting infill development and socioeconomic equity, **the protection of environmental and agricultural resources**, the encouragement of efficient development patterns, and **the achievement of the region’s greenhouse gas reductions targets provided by the State Air Resources Board** pursuant to Section 65080.”<sup>1</sup>
- The Sixth Statutory Objective for RHNA, pending state legislation, is; “**Reducing development pressure within very high fire risk areas.**”<sup>2</sup>

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<sup>1</sup> [https://rhna-factors.mtcanalytics.org/data/RHNA\\_Statutory\\_Objectives.pdf](https://rhna-factors.mtcanalytics.org/data/RHNA_Statutory_Objectives.pdf)

<sup>2</sup> [https://rhna-factors.mtcanalytics.org/data/RHNA\\_Statutory\\_Objectives.pdf](https://rhna-factors.mtcanalytics.org/data/RHNA_Statutory_Objectives.pdf)



- As mandated by Senate Bill 375, the main purpose of the Plan Bay Area 2050 Draft Blueprint, the Bay Area's Sustainable Communities Strategy, is to **lower Green House Gas (GHG) emissions from cars and light trucks** while accommodating all needed housing growth within the region.
- Plan Bay Area 2050 Draft Blueprint's Guiding Principle entitled "Healthy" states; **"The region's natural resources, open space, clean water, and clean air are conserved – the region actively reduces its environmental footprint and protects residents from environmental impacts."**<sup>3</sup>
- Plan Bay Area 2050 Draft Blueprint's Strategy #8 states; **"Reduce Risks from Hazards.** Adapt the vast majority of the Bay Area's shoreline to sea level to protect existing communities and infrastructure, while providing means-based financial support to retrofit aging homes."<sup>4</sup> Until communities and infrastructure are actually protected from sea level rise, areas subject to sea level rise should not be further developed.
- Plan Bay Area 2050 Draft Blueprint's Strategy #9 states; **"Reduce Environmental Impacts.** Maintain the region's existing urban growth boundaries through 2050, while simultaneously partnering with public and non-profit entities to protect high-value conservation lands. **Further expand the Climate Initiatives Program to drive down greenhouse gas emissions."**<sup>5</sup>
- The Plan Bay Area 2050 Draft Blueprint states that **Areas Outside Urban Growth Boundaries (including Priority Conservation Areas – PCAs) and Unmitigated High Hazard Areas should be protected.**<sup>6</sup> As such, growth should not be targeted in such areas.
- In addition, the Housing Opportunity Areas are supposed to be areas with high quality public schools, proximity to well-paying jobs, a high-income population, and a **clean and safe environment.** <sup>7</sup>

Contrary to the above RHNA and Plan Bay Area 2050 objectives, the Option 8A RHNA Allocation Methodology will not further Green House Gas reduction goals or protect residents from hazardous environmental impacts. Option 8A allocates too many housing units to suburban areas that are far from job centers, lack adequate public transit, and are subject to perilous hazards. Especially worrisome is the fact that the methodology increases development in high fire hazard zones with unsafe evacuation routes, and in areas subject to lack of water supply, sea level rise, and flooding.

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<sup>3</sup> [https://www.planbayarea.org/sites/default/files/PBA2050\\_GP\\_Res.4393\\_Table.pdf](https://www.planbayarea.org/sites/default/files/PBA2050_GP_Res.4393_Table.pdf)

<sup>4</sup> [https://www.planbayarea.org/sites/default/files/5b\\_PBA50\\_DraftBlueprint\\_StrategiesAction.pdf](https://www.planbayarea.org/sites/default/files/5b_PBA50_DraftBlueprint_StrategiesAction.pdf)

<sup>5</sup> [https://www.planbayarea.org/sites/default/files/5b\\_PBA50\\_DraftBlueprint\\_StrategiesAction.pdf](https://www.planbayarea.org/sites/default/files/5b_PBA50_DraftBlueprint_StrategiesAction.pdf)

<sup>6</sup> Mayor Pro Tem Pat Eklund. "Report on ABAG to MCCMC". September, 2020

<sup>7</sup> <https://www.treasurer.ca.gov/ctcac/opportunity/2020-tcac-hcd-methodology.pdf>

## II. RECOMMENDED ALTERNATIVE RHNA ALLOCATION METHODOLOGY OPTION

In order for the Regional Housing Need Allocations to meet RHNA Statutory Objectives and be consistent with Plan Bay Area, we recommend you approve an Alternative RHNA Allocation Methodology Option with the following features:

### 1. Use the baseline allocation recommended by the Contra Costa County Mayors Conference entitled; “Future Housing Growth 2015-2050 (Draft Blueprint)” AKA “Housing Growth (Blueprint)”:

The new Alternative RHNA Allocation Methodology Option should use the baseline allocation recommended by the Contra Costa County Mayors Conference entitled; “Future Housing Growth 2015-2050 (Draft Blueprint)” AKA “Housing Growth (Blueprint)” in **Figure 1** (below). This alternative baseline allocation is based on each jurisdiction’s share of Bay Area household future growth through 2050 and is better aligned with the growth pattern in the Plan Bay Area 2050 Draft Blueprint. Emphasis on future employment development patterns leads to RHNA allocations being more focused in Silicon Valley, the region’s largest job center. Moreover, this approach was suggested by ABAG Staff in July 2020 and is consistent with how long-range forecasts have been used in ABAG’s methodologies for previous RHNA cycles.

*Figure 1: Jurisdiction Share of Regional Total for Baseline Allocation Options*



### 2. The new RHNA Allocation Methodology Option should target growth near employment and high-quality public transit:

Option 8A targets growth in areas far from employment and/or areas with non-existent or poor-quality public transit, in which bus routes have average service intervals during peak traffic hours that are as long as 30 minutes. Few, if any, residents would use public transit that is so inconvenient. Instead, include a metric in the RHNA Allocation Methodology that targets growth near employment centers and in “Transit Rich Areas”. Transit Rich Areas should be areas near a “major transit stop”, such as a rail transit station or ferry terminal, or a “high-quality bus

corridor”, which is a fixed bus route service with average service intervals of 15 minutes or else 10 minutes or less during peak traffic hours.

**3. The new RHNA Allocation Methodology Option should preclude development in areas subject to hazards, particularly areas subject to lack of water supplies, sea level rise & flooding, and high fire risk:**

Only Option 8A’s baseline allocation, which is consistent with the Plan Bay Area 2050 Draft Blueprint, protects households from hazards. Many of Option 8A’s other metrics, including the “High Opportunity Areas Map”, target household growth in hazardous areas, which would greatly endanger residents. This should be rectified.

When trying to improve housing equity and further fair housing, it is unconscionable to expose vulnerable senior and lower income households to high hazard risks, when they have the least resources available to cope with the adversity caused by such hazards.

A new alternative RHNA Allocation Methodology Option should preclude development in areas subject to hazards, particularly areas subject to lack of water supplies, sea level rise & flooding, and areas within the Wildlands Urban Interface with unsafe evacuation routes. This includes Very High Fire Hazard Zones and High Fire Hazard Zones. Evacuation routes in “High Fire Hazard Zones” are typically just as perilous as “Very High Hazard Zones”.

In addition, please ensure that the RHNA allocation methodology and Plan Bay Area 2050 Draft Blueprint use Wildland Urban Interface (WUI) maps to identify high fire risk areas. These maps are available at local Fire Districts and in the Metropolitan Transportation Commission Map Gallery.

We understand that, currently, only CAL FIRE High Fire Hazard Severity Zones are factored into the RHNA methodology and Plan Bay Area. Many high fire risk areas, which are in Local Responsibility Areas and not State Responsibility Areas, have not been evaluated by CAL FIRE, and therefore have not been given a “Severity” designation (a term only used by CAL FIRE) and are not identified on CAL FIRE maps.

Below is a link to the CAL FIRE map entitled: "DRAFT Fire Hazard Severity Zones in Local Responsibility Areas". You will see that in the Local Responsibility map there are gray areas entitled; “Local Responsibility Area Un-zoned – (LRA Un-zoned)” - meaning CalFire has not yet evaluated these areas.

Link to “DRAFT Fire Hazard Severity Zones in Local Responsibility Areas” Map:  
[https://osfm.fire.ca.gov/media/6706/fhszl06\\_1\\_map21.pdf](https://osfm.fire.ca.gov/media/6706/fhszl06_1_map21.pdf)

### III. CONCLUSION

We respectfully request that you reject the **Option 8A** RHNA Allocation Methodology and instead approve an Alternative Allocation Methodology Option with the above recommended features. In doing so, you will correct the flaws of Option 8A and provide a RHNA Allocation Methodology that meets RHNA statutory objectives and is consistent with the Plan Bay Area 2050 Draft Blueprint.

Thank you in advance for your conscientious consideration.

Very truly yours,

/s/

Sharon Rushton, Chair  
**Sustainable TamAlmonte**

## Personal Statement to ABAG re: RHNA requirements

As a concerned resident of Portola Valley I am sending you my comments re: your new RHNA requirements. I am completely in favor of your attempts to create affordable housing in our area; having lived here since 1974 I have observed the continuous decline of decent housing for our working population.

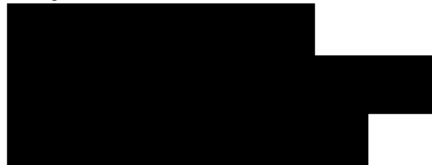
That being said; the new requirements were written in our “old” world. The pandemic has really turned everything in society upside down and we will not be able to see what the future will look like for at least a year. It seems impractical to keep enforcing such stringent rules on planning for more housing to be built when we can see dozens of large office spaces empty, retail locations becoming vacant and people moving from the Bay Area.

Also as a resident of a town with a high risk of wildfires; I would hope ABAG can push the “pause” button for six months to a year until more planning can take place.

I have always been in favor of ABAG’s approach to organizing all our counties into a somewhat unified group; not perfect but it has helped the area in many ways.

Thank you for all your hard work.

Joyce Shefren



[REDACTED]

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**From:** Al Dugan [REDACTED]  
**Sent:** Wednesday, November 18, 2020 12:18 PM  
**To:** Regional Housing Need Allocation  
**Cc:** Sharon Rushton  
**Subject:** Comment on MTC/ ABAG RHNA Projections.

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**\*External Email\***

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I raised this issue with ABAG in the past; there is a very big variance between ABAG/MTC population growth projections for Marin used to allocate RHNA requirements and the CA Department of Finance (DOF) population projects.

[http://www.dof.ca.gov/Forecasting/Demographics/projections/documents/P1\\_County\\_1yr.xlsx](http://www.dof.ca.gov/Forecasting/Demographics/projections/documents/P1_County_1yr.xlsx)

CA DOF projections are used by every unit of the CA government for planning, yet again is being ignored by ABAG/MTC. This illustrates a major flaw in the RHNA projections for Marin. I believe a legal challenge would be in order if the Marin RHNA is approved per the MTC/ABAG projection is approved.

Al Dugan  
[REDACTED]

[REDACTED]

## Eli Kaplan

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**From:** Dave Vautin  
**Sent:** Thursday, November 19, 2020 2:56 PM  
**To:** Al Dugan  
**Cc:** Regional Housing Need Allocation  
**Subject:** RE: Marin RHNA

Thank you Al. The report is in draft form, so I'm sending along your suggestions to the RHNA comment box. We are taking comments through Friday 11/27.

Dave Vautin, AICP  
Assistant Director, Major Plans  
dvautin@bayareametro.gov - (415) 778-6709

BAY AREA METRO | BayAreaMetro.gov  
Metropolitan Transportation Commission  
Association of Bay Area Governments

-----Original Message-----

From: Al Dugan <aldugan2002@yahoo.com>  
Sent: Thursday, November 19, 2020 2:41 PM  
To: Dave Vautin <DVautin@bayareametro.gov>  
Subject: Marin RHNA

\*External Email\*

I have searched the report, and see no analysis of water, funding for schools, funding for police and other related services to larger volumes of housing. Can you please advise, I am working to complete my review and final submission.

This is particulate critical for Novato. The city only receives 7.5% of property tax revenue and is the poorest city for revenue per person in Marin county and is being assigned 55% of the housing.

Al Dugan  
Novato

Sent from my iPad



[REDACTED]

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**From:** Steve Levine [REDACTED]  
**Sent:** Wednesday, November 18, 2020 12:22 PM  
**To:** Regional Housing Need Allocation  
**Subject:** RHNA Proposed Methodology  
**Attachments:** Sustainable TamAlmonte letter to ABAG Executive Committee re- RHNA Allocation Methodology 11-18-20.pdf

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**\*External Email\***

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We strongly endorse the recommendations to you made by Sustainable TamAlmonte.  
We would appreciate your support of their valid points regarding the proposed RHNA methodology.  
Thank you,  
Steven Levine  
[REDACTED]



1275 4th Street #179  
Santa Rosa, CA 95404

(707) 900-4364  
info@generationhousing.org

November 27, 2020

Mayor Jesse Arreguín, President  
Executive Board, Association of Bay Area Governments  
375 Beale Street, Suite 700  
San Francisco, CA 94105

**RE: Proposed RHNA Methodology and Subregional Shares – Support for Option 8A & Sonoma County Unincorporated Allocation Adjustment**

Dear President Arreguín & ABAG Executive Board,

Generation Housing respectfully encourages the Association of Bay Area Governments (ABAG) to adopt the Proposed Regional Housing Needs Allocation (RHNA) Methodology and adjust the preliminary allocation for unincorporated Sonoma County.

Generation Housing is a nonprofit housing advocacy organization that works to support an increase in the supply, diversity, and affordability of housing in Sonoma County. The proposed methodology is an equitable, ambitious, and well-researched strategy to house our region that recognizes our climate crisis and a legacy of segregation on the basis of race and income in the San Francisco Bay Area.

Generation Housing embraces the overall baseline allocation for Sonoma County made in data-driven consideration of Plan Bay Area 2050. Our county is expected to build 4% of the Bay Area's housing, or just over 17,000 homes. This marks a 108% increase countywide over the 2015-2023 RHNA cycle, but is the same percentage as last cycle and proportional to our population within the San Francisco Bay Area. We are confident that Sonoma County is capable of meeting the challenge of accelerated housing production with transit-oriented infill development that lowers vehicle miles traveled (VMT).

Generation Housing urges ABAG to consider an adjustment to the housing allocation for unincorporated areas serviced by the County of Sonoma. An adjustment to the allocation should consider an intra-county shift that reallocates some of our baseline allocation into cities and towns of Sonoma County. Generation Housing echoes concerns expressed in letters submitted by Greenbelt Alliance and Jane Riley, AICP, Comprehensive Planning Manager with the County of Sonoma.

Rural, unincorporated areas of Sonoma County face substantial challenges to housing production spanning fires, floods, and decentralized infrastructure. A series of wildfires that have reshaped our region since 2017 have disproportionately devastated our communities outside of city limits. A nearly tenfold increase in the housing allocation to unincorporated Sonoma County over the last RHNA cycle heightens our concern for further loss of life and property. Moreover, urban growth boundaries and community separators mandated by voters across our county culminate in a near impossibility of over 5,000 new homes sprawling into the farms and open spaces of unincorporated Sonoma County. We accept the challenge of the higher overall housing numbers for Sonoma County, and Generation Housing is keen to help determine a better way to build 17,000 new homes countywide.

We have been impressed with the ABAG Executive Board, Housing Methodology Committee, and Staff who have faced the challenge of creating nearly half a million homes in our region with innovation and care. The preliminary allocation warrants approval, and requires continued attention.

Respectfully,

Jen Klose



Executive Director, Generation Housing

cc: ABAG Executive Board Director Jake Mackenzie, City of Rohnert Park  
ABAG Executive Board Director David Rabbitt, County of Sonoma  
Gillian Adams, Principal Planner, Regional Housing Needs Allocation



proposed RHNA methodology is no longer appropriate

Mary McFadden [REDACTED]

Fri 11/27/2020 12:09 PM

To: Regional Housing Need Allocation <rhna@bayareametro.gov>

**\*External Email\***

I urge you to reject the proposed RHNA Methodology until the accuracy of the housing numbers is confirmed, the assumptions are aligned with the reality of state (not national) trends in a post-COVID world; and the legality of the decision is determined.

M McFadden

[REDACTED]

## Reject the proposed RHNA Methodology

Eric Schaefer [REDACTED] >

Fri 11/27/2020 11:51 AM

To: Regional Housing Need Allocation <rhna@bayareametro.gov>

**\*External Email\***

I urge you to reject the proposed RHNA Methodology until the accuracy of the housing numbers is confirmed, the assumptions are aligned with the reality of state (not national) trends in a post-COVID world; and the legality of the decision is determined.

Without an appropriate methodology, the Bay Area will continue to develop too much market rate (luxury) housing and too little affordable housing.

Thank you.

--

Eric Schaefer

“Treating different things the same can generate as much inequality as treating the same things differently.”

— Kimberlé Crenshaw

## RHNA Cycle 6 Methodology

Eric Filseth <[REDACTED]>

Fri 11/27/2020 11:57 AM

To: Regional Housing Need Allocation <rhna@bayareametro.gov>

Cc: Tom DuBois <[REDACTED]>

\*External Email\*

Dear ABAG Executive Board,

Please take two actions relative to the proposed RHNA Methodology.

First, **please reject the proposed RHNA Methodology altogether until the accuracy of the housing numbers can be confirmed**. The accuracy of RHNA targets takes on a much greater criticality when they don't merely guide zoning plans, but where the State punishes cities if the private sector does not actually build the units. The accuracy of the regional RHNA Cycle 6 targets is especially suspect because:

- There's growing quantitative evidence that HCD's targets are overstated, and that the Bay Area's target of 441,000 units may be 25-50% too high even by HCD's own models
- Even on a qualitative basis, HCD's aggressive targets challenge credibility at a time when large numbers of people are leaving the state, it's clear that remote work will persist in a post-COVID world, and rental prices in California cities are already falling.

Second, once realistic regional numbers become available, **please adjust the RHNA methodology to include city-by-city job-growth policies into the assessment of "high opportunity" vs "low opportunity" zones**.

Under HCD's methodology, the RHND targets come roughly half from "pent up demand" calculated by attempts to estimate overcrowding; and the other half from expectations of future job and population growth. No matter what calculation is used to estimate existing "pent up demand," individual City policies don't influence their "pent up demand;" but individual City policies certainly do influence their own future job growth.

As everybody knows, the region's housing woes stem from its generation of new jobs much faster than housing. However, this can be influenced at the City-by-City level. For example, starting in 2015 Palo Alto began imposing commercial growth limits that drastically curtailed its future job growth through the year 2030 – essentially to stop the City's job growth from outstripping its ability to provide housing for those workers. So a large mixed-use project such as Greystar (<https://padailypost.com/2020/11/16/massive-five-block-office-and-apartment-project-approved/>), approved in different city last week, and which adds much more new housing demand than new supply, can't be built in Palo Alto until at least RHNA Cycle 7. This has drastically curtailed Palo Alto's jobs growth, as intended

The RHNA Cycle 6 methodology should consider such individual City actions in its determination of what constitutes "high opportunity" zones, for two reasons:

1. First, half of new housing (the "new" half, not the "pent up" half) should be more heavily directed to the cities where new jobs are likely to appear. There's no reason to put new housing for new San Jose jobs in Atherton.
2. Second, cities which want to create jobs to drive their own economic growth should certainly do so, but they should also take responsibility for the housing needed to support those jobs. If every city balanced its

job and housing growth, as a region we'd solve the problem.

ABAG should insist that HCD should do its calculation of statewide targets in a way that is both rigorous and uses the latest data available; and Cities should share the responsibility for the whole jobs-and-housing problem, not just the housing piece alone.

Sincerely,

Eric Filseth, Councilmember, City of Palo Alto

Tom DuBois, Vice-Mayor, City of Palo Alto

## Halt the RHNA Process

West Bay Citizens Coalition <westbaycitizenscoalition@protonmail.com>

Fri 11/27/2020 11:06 AM

To: Regional Housing Need Allocation <rhna@bayareametro.gov>

Cc: Therese W. McMillan <tmcmillan@bayareametro.gov>

\*External Email\*

# West Bay Citizens Coalition

Empowering West Bay communities to find

locally driven solutions to regional problems

Dear President Arreguin and ABAG Executive Board,

It is essential that you halt the RHNA process as the methodology must be compatible with Plan Bay Area 2050 Blueprint. This requires compatibility with the regional housing number for the region as a whole along with a formula that is based on "jobs growth in already jobs-rich areas".

The issue is that this has produced a proposal that concentrates jobs allocation (and the associated housing for those jobs) within a narrow geographic region of the South Bay (parts of five cities in Silicon Valley). This has resulted in RHNA numbers in those five cities that call for a 32% increase in the total housing stock in these cities over the next eight years.

This is obviously unattainable and will have severe consequences for residents of the West Bay.

- With both huge job growth and huge housing growth in an area that already has the highest land and office and housing costs in the country, building affordable housing within the West Bay will become next to impossible.
- Infrastructure costs necessary for the expanded population will overwhelm already overburdened budgets.
- New taxes and fees will fall on disproportionately on residents who are struggling to make ends meet.
- Dense worker housing will leave little room for families with children (San Francisco already has the lowest share of its population between the ages of 5 and 17 of any city in the country) as an overcrowded Silicon Valley with an increasing share of dense worker housing is likely to join it.
- The decision-making role of land-owning developers is sure to increase, concentrating centralized decision-making authority to the detriment of nearly all residents.
- Effective construction of Below Market Rate Housing will be hamstrung in a context where existing rules put the excessive cost burdens on working residents rather than expanding new businesses.



- There has been no effective discussion of the longer-term consequences of COVID increasing the share of more effective work at home.

Each of these issues deserve close attention and open public discussion. In fact, the current California Code requires the regional planning process to promote alternative ways to improve jobs and housing imbalances within the region (Code Section 65584 (d) (3)). Neither ABAG nor HCD has had such an open discussion but dismissed any such discussion early in the process.

We urge you to halt and reconsider the RHNA process and work with local governments to resolve these issues with what has been a fundamentally broken process based on flawed assumptions.

Best regards,

The West Bay Citizens Coalition

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Campbell, Cupertino, Los Altos, Menlo Park, Mountain View,  
Palo Alto, Saratoga, Sunnyvale... and growing

**Eli Kaplan**

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**From:** Stuart Hansen <[REDACTED]>  
**Sent:** Thursday, November 19, 2020 10:06 AM  
**To:** Regional Housing Need Allocation  
**Subject:** Housing Mandates

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**\*External Email\***

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The announced RHNA mandates for Palo Alto (10,058 units) are totally unrealistic, especially in light of the huge changes in work habits brought on by COVID-19.

It is simply not feasible to zone (and build) this number of new housing units without a drastic effect on our city, it's people and its infrastructure limits.

We will fight this ridiculous legislation to the bitter end. We have no further use for ABAG membership...you didn't fight to protect our cities from the state. Goodbye. Stuart Hansen, taxpayer/resident

## Proposed RHNA Methodology and Subregional Shares

Patti Fry

Fri 11/27/2020 9:31 AM

To: Regional Housing Need Allocation <rhna@bayareametro.gov>

\*External Email\*

To whom it may concern:

I admire the intent to balance better the jobs and housing in our communities as well as to support more opportunities and equity. However, I have major concerns about the RHNA (and Plan Bay Area) methodology and allocations, particularly in this unprecedented time:

**1. ABSENCE OF CONSIDERATION OF COVID-19'S LONG-LASTING IMPACTS ON WORK** - The housing needs appear to be based on estimated employment based on history rather than to take into consideration any of the likely lasting effects of COVID. Since it is highly likely that employment practices - particularly regarding remote work - will be changed forever, these will greatly alter commute patterns and the locations where housing is needed. Major employers have already stated this. The pandemic has proven that employees and contractors are able to work far from the bay area, even out of state, and many will not need bay area housing. Thus, commute patterns and locations where housing will be needed will be greatly altered.

*The methodology and the allocations need to take COVID'S long-term employment impacts into account, at a minimum as a revision within two years to the methodology and allocations.*

**2. INADEQUATE CONSIDERATION OF INFRASTRUCTURE** - The allocation method for most new housing does not seem to take into account where major transit hubs are or will be. There is no consideration of available transit for moderate and above housing, seemingly assuming that nearly all new residents will be reliant on vehicles. That can make it difficult for cities to meet climate change goals as well as difficult to support transit with new commuters who will need to rely on autos instead.

It also ignores schools' capacity, water availability, access to groceries and services, and other infrastructure to support new housing and residents. Top-down allocations ignore these practical issues that cities may not be able to solve without regional or state support that has been missing. For example, cities are virtually powerless to improve transit whereas ABAG/MTC is in the driver's seat but not providing solutions.

*The methodology should take infrastructure much more into account.*

**3. TOP-DOWN ALLOCATIONS AT CITY LEVEL** - Cities considered High Resource Areas, oddly whether jobs-rich or more wealthy - may be located adjacent to cities considered to be of lower incomes and "housing rich", but the allocations do not consider this. For example, in southern San Mateo County, such cities not only share boundaries, they cross county lines.

Improved access to opportunity cannot be solved solely by housing policy. It is a factor, but cannot take the place of improved educational and employment opportunities that are not solvable at a single-city level.

*ABAG/MTC should allow, promote, and support (i.e., fund) sub-regional cooperation and planning to better level-out housing demand and supply while also addressing other issues related to opportunity and equity.*

4. **JOBS-HOUSING RATIO** - There is a housing shortage because jobs have been increasing faster than the supply of sufficient housing in which the new workers will live. The PBA and ABAG methodologies address only the housing supply, not the driver of demand. This is a flaw that should be acknowledged and remedied.

Both Land Use Elements and Zoning Ordinances must support Housing Elements. As long as zoning allows more profitable uses (e.g., office in recent years) that add jobs without requiring commensurate housing, the situation will continue to worsen.

Zoning for housing from the state level is an unnecessarily blunt instrument. Zoning at a city level takes into account unique characteristics and the infrastructure of the community.

There are better alternatives that address land use.

*The methodology should focus on jobs/housing ratio at sub-regional levels, and require inclusion of this consideration in Housing Elements and require support through the Land Use Elements and Zoning Ordinances. Further, provide incentives, not sticks, for sub-regions to work it out.*

Respectfully submitted,

Patti Fry

[REDACTED]

November 27, 2020

Mayor Jesse Arreguin, President  
Executive Board, Association of Bay Area Governments  
375 Beale Street, Suite 700  
San Francisco, CA 94105

RE: Proposed RHNA Methodology and Subregional Shares - Support for **Option 8A** using the Plan Bay Area 2050 **Households** Baseline with while addressing **overallocation to unincorporated county areas**

Dear President Arreguin and ABAG Executive Board,

We are a diverse set of organizations and stakeholders from across the region focusing on housing, the environment, and the economy. **We strongly support ABAG's proposed RHNA methodology, known as the "High Opportunity Areas Emphasis & Job Proximity" methodology ("Option 8A") using the Plan Bay Area 2050 Households baseline.** However, we also support a data driven adjustment from unincorporated counties to ensure that the methodology meets statutory requirements to promote infill development and protect the environment.

Option 8A represents a sound compromise born of an in-depth, iterative process at the ABAG Housing Methodology Committee. Over the last year, this diverse group of local elected officials, city and county staff, and community stakeholders engaged in robust discussion on every aspect of the methodology. We appreciate the hard work and compromise of this committee, and the support of ABAG in adopting this recommendation. **We believe an adjustment in the unincorporated county allocations falls within the spirit of this methodology and we look forward to supporting cities, counties and ABAG/MTC staff in making this adjustment.**

**As ABAG staff has demonstrated through a set of performance metrics, Option 8A performs well on all five of RHNA's statutory objectives.** This methodology will help our region improve our environment, reduce our commutes, and ensure every resident has a stable home they can afford:

1. Improve our Environment: Option 8A will help improve our environmental health and mitigate climate change in several ways:
  - a. The "Access to High Opportunity Areas" factor allocates more homes in jurisdictions with high quality economic, educational, and *environmental*

opportunity.<sup>1</sup> This means that more homes, especially affordable homes, will be allocated to jurisdictions with quality jobs, adequately-resourced schools, and minimal pollution.

- b. The 70 percent weight to the “Access to High Opportunity Areas” factor for affordable homes will require jurisdictions that have mostly zoned for single-family homes to now zone for multi-family housing to meet the very low- and low-income allocations.<sup>2</sup> Multi-family buildings, such as apartments, are more efficient uses of our space and they use less energy, water, and land than single-family neighborhoods.<sup>3</sup>
  - c. The Plan Bay Area 2050 Households baseline and job proximity factors allocate more homes near projected job growth, thereby reducing commutes and greenhouse gas emissions.
- 2. Reduce our Commutes: Option 8A will reduce commutes for *all kinds of jobs*, not just the tech jobs in Silicon Valley, in order to meet the new statutory jobs-housing fit requirement. Jobs-housing fit is a jurisdiction’s ratio of low-wage jobs to homes affordable to those workers.<sup>4</sup> Those workers include farmworkers, service workers at our tourist destinations, homes, offices, and schools, and many more.
  - 3. Stable Homes for all Bay Area Residents: Residents across the Bay Area have a wide range of income levels but those on the lower end have few options affordable to them. Option 8A helps ensure that there will be new homes affordable in every part of the region.

In short we believe that option 8A is the best methodology in meeting the goals of the RHNA process. However, we understand that there are limitations to the methodology process, particularly around the differences in incorporated and unincorporated jurisdictions. **We are concerned that the high allocations for unincorporated areas, which are primarily rural, agricultural, or open space, will significantly increase pressure to zone for housing in areas at high risk for fire, over PCAs, on productive agricultural lands, or proximate to critical habitat linkages.** We also know that the goals of the recommended methodology and the Plan Bay Area 2050 projections are meant to focus growth within our cities and towns, protecting natural and working landscapes and maintaining existing urban growth boundaries. To that end we support the ongoing efforts of cities, counties, and ABAG/MTC staff in the following areas:

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<sup>1</sup> California Tax Credit Allocation Committee’s [Opportunity Mapping Methodology 2020](#); Environmental opportunity is based on [CalEnviro Screen 3.0](#), which measures the level of environmental health in each census tract, including the extent of air and water pollution.

<sup>2</sup> Cal. Gov. Code Section [65583.2\(c\)\(3\)\(B\)](#).

<sup>3</sup> “[Apartments in buildings with 5 or more units use less energy than other home types](#),” U.S. Energy Information Administration (June 2013).

<sup>4</sup> “[Low-wage Jobs-housing Fit](#): Identifying Locations of Affordable Housing Shortages,” UC Davis (Feb. 2016).

**Subregional methodologies:** Our perspective is that overall, cities and counties should work together to ensure that county land can provide the important open space and farming benefits that we all appreciate, and cities can provide the homes, jobs, and services that we need. We support the efforts of Napa and Solano Counties in their subregional processes and we recommend that in future cycles, more counties enter into similar agreements.

Data-based city-county adjustments: although not all counties have official subregional agreements, we're heartened to see the cities, counties, and regional agency staff working hard to identify ways to reallocate units away from unincorporated areas, fulfilling the statutory RHNA goals of protecting environmental and agricultural resources. We encourage cities around the region to work collaboratively with their county counterparts to ensure we are all doing our part to accommodate the homes we need while protecting our rural areas that provide much needed agricultural, fire resilience, recreational, and habitat benefits. With this adjustment, we request that the additional housing allocations for unincorporated counties across the region be significantly reduced to maintain consistency with climate goals and strategies with Plan Bay Area and the State of California.

Thank you for working with us to make our region more resilient.

## **Organizations**

Amanda Brown Stevens  
**Greenbelt Alliance**

Laura Foote  
**YIMBY Action**

Alice Kaufman  
**Green Foothills**

Todd David  
**Bay Area Housing Advocacy Coalition**

Will Richards  
**Sonoma County Transportation and  
Land Use Coalition**

David Watson  
**Mountain View YIMBY**

Charlotte Williams  
**Napa Vision 2050**

Kelsey Banes  
**Peninsula for Everyone**

Jen Klose  
**Generation Housing**

**Urban Environmentalists**

**East Bay for Everyone**

Michael Allen  
**Sonoma County Conservation Action**

**South Bay YIMBY**

Aaron Eckhouse  
**California YIMBY**

## Individuals

Daniela Ades, San Francisco  
Kirsten Aguila, San Jose  
Andrew Aldrich, Oakland  
Patricia Bias, Brentwood  
Paris Badat, Oakland  
Rita Bagala, Santa Rosa  
Carol Barge, Napa  
Chaplain Rev Bear, San Jose  
Emily Blanck, Walnut Creek  
Aiyana Bodi, San Francisco  
Nancy Boyce, San Rafael  
Jennifer Brayton, Santa Rosa  
Craig Britton, Los Altos  
Matthew Carranza, Livermore  
Garth Casaday, Richmond  
Andrew Chao, Danville  
Gail Cheeseman, Saratoga  
Michael Chen, San Francisco  
Kathryn Choudhury, Moraga  
Charles Collins, Sebastopol  
MollyCox, Sunnyvale  
Nora Cullinen, Oakland  
Virginia Cummins, Union City  
Changlin Dillingham, Walnut Creek  
Kathleen Dovidio, Sebastopol  
Andrew Fister, San Francisco  
Paul Fritz, Sebastopol  
Joshua Geyer, Alameda  
Joanna Gubman, San Francisco  
Michael Henn, Piedmont  
Lawrence Jensen, Oakland  
Robert Johnson, Berkeley  
Stephanie Klein, Palo Alto  
Stephen Knight, Berkeley  
Phillip Kobernick, San Francisco  
Michael Lampered, San Francisco  
Maureen Lahiff, Oakland  
Libby Lee-Egan, Berkeley  
Bill Leikam, Mountain View  
Nora Linville, Windsor  
Kevin Ma, Palo Alto  
Kimberly Marks Martinez  
Sandra Martensen, Santa Rosa

Ben Martin, Mountain View  
Kai Martin, Pacifica  
Deborah Morrison, Benicia  
Mark Mortensen, Santa Rosa  
Jana Muhar, Santa Rosa  
Sam Naifeh, San Mateo  
Tim O'Brien, Belmont  
Sara Ogilvie, San Francisco  
Carole Ormiston, Sausalito  
Tara Parker-Essig, Oakland  
Gaylon Parsons, Alameda  
Richard Patenaude, Hayward  
Christopher Pederson, San Francisco  
Claire Perricelli, Eureka  
Steve Price, Berkeley  
Aaron Priven, Albany  
Anna Ransome, Graton  
Kyra Rice, Willits  
Kevin Riley, Antioch  
Chris Rinaldi, Healdsburg  
Rupal Sanghvi, Berkeley  
Judith Smith, Oakland  
Erica Stanojevic, Santa Cruz  
Wendy Stock, Berkeley  
Zack Subin, San Francisco  
Edward Sullivan, San Francisco  
Trish Tatarian, Santa Rosa  
Milo Trauss, San Francisco  
Atisha Varshney, Santa Clara  
Barbara Weinstein, Los Altos  
Ann Wettrich, Oakland  
Gretchen Whisenand, Santa Rosa  
Heather Wooten, Oakland  
Sabina Yates, Benicia  
Marylee Guinon, Sebastopol  
Dale Riehart, San Francisco  
Jesssica Woodard, Berkeley  
Pam Zimmerman, Santa Rosa



## Reject RHNA Methodology

anastasia Yovanopoulos <[REDACTED]>

Fri 11/27/2020 7:22 AM

To: Regional Housing Need Allocation <rhna@bayareametro.gov>

**\*External Email\***

November 27, 2020

Mayor Jesse Arreguin, President  
ABAG Executive Board  
c/o ABAG & MTC Public Information Office  
[RHNA@bayareametro.gov](mailto:RHNA@bayareametro.gov)

Dear President Arreguin and ABAG Executive Board Members:

I urge you to reject the proposed RHNA Methodology until the accuracy of the housing numbers is confirmed, the assumptions are aligned with the reality of state (not national) trends in a post-COVID world; and the legality of the decision is determined.

1. California's housing need isn't as great as the state claims. It is irresponsible to approve the Methodology until the approach to determine the numbers is proven reliable.

The Embarcadero Institute's report ["Double Counting in the Latest Housing Needs Assessment"](#) (September 2020) finds, "Use of an incorrect vacancy rate and double counting, inspired by SB-828, caused the state's Department of Housing and Community Development to exaggerate by more than 900,000 the units needed in SoCal, the Bay Area and the Sacramento area."

"The state's approach to determining the housing need must be defensible and reproducible if cities are to be held accountable. Inaccuracies on this scale mark the fact that cities and counties are surpassing the state's market-rate housing targets but falling far short in meeting affordable housing targets."

2. The assumptions of the RHNA Methodology are unreliable. It is irresponsible to approve the Methodology until the assumptions are aligned with the reality of COVID-19, remote work, changing transportation patterns, an exodus from California, and deepening economic upheaval.

3. RHNA Methodology that usurps local authority endowed to elected City Councils or Boards of Supervisors will not go unchallenged. Nor will community leaders, homeowners, and renters stand by as HCD foists irrational, wildly inflated housing quotas on communities. [CalMatters columnist Dan Walters](#), reporting about the Embarcadero Institute report writes, "resistance has developed among affected local governments and officials are mulling whether to challenge them in court."

Please reject the unreliable RHNA Allocation Methodology. Take time to collaborate with locally elected officials and community leaders to get it right. With accuracy and collaboration, housing needs can be solved.

Sincerely,  
Anastasia Yovanopoulos  
San Francisco Tenants Union, member

## Reject RHNA methodology

Kathy Jordan <[REDACTED]>

Thu 11/26/2020 9:53 PM

To: Regional Housing Need Allocation <rhna@bayareametro.gov>

**\*External Email\***

**Summary:** *I urge you to reject the proposed RHNA Methodology until the accuracy of the housing numbers is confirmed, the assumptions are aligned with the reality of state (not national) trends in a post-COVID world; and the legality of the decision is determined.*

*Thank you.*

*Best,*

*Kathy Jordan*

## Repair the RHNA Process!

Michael Nash <[REDACTED]>

Thu 11/26/2020 2:26 PM

To: Regional Housing Need Allocation <rhna@bayareametro.gov>

**\*External Email\***

Dear ABAG Executive Board Members:

Summary: Reject the proposed RHNA Methodology until the accuracy of the housing numbers is confirmed, the current assumptions are modified to align with the reality of state (not national) trends in a post-COVID world; and the legality of the decision is determined.

1. California's housing need isn't as great as the state claims. It is irresponsible to approve the Methodology until the approach to determine the numbers is proven reliable.

The Embarcadero Institute's report "Double Counting in the Latest Housing Needs Assessment" (September 2020) finds, "Use of an incorrect vacancy rate and double counting, inspired by SB-828, caused the state's Department of Housing and Community Development to exaggerate by more than 900,000 the units needed in SoCal, the Bay Area and the Sacramento area."

"The state's approach to determining the housing need must be defensible and reproducible if cities are to be held accountable. Inaccuracies on this scale mark the fact that cities and counties are surpassing the state's market-rate housing targets but falling far short in meeting affordable housing targets."

2. The assumptions of the RHNA Methodology are unreliable. It is irresponsible to approve the Methodology until the assumptions are aligned with the reality of COVID-19, remote work, changing transportation patterns, an exodus from California, and deepening economic upheaval. The impact of SB-828 needs to be removed to make this a fair process.

3. RHNA Methodology that intends to usurp local authority endowed to elected City Councils or Boards of Supervisors will not go unchallenged. They cynically are noting that these targets are not intended to succeed, but rather to provide an argument that local government is the problem in order to strip local government of their role in zoning. Community leaders, homeowners, and renters are appalled as HCD foists irrational, wildly inflated housing quotas on communities. CalMatters columnist Dan Walters, reporting about the Embarcadero Institute report writes, "resistance has developed among affected local governments and officials are mulling whether to challenge them in court."

I understand 31 cities in Southern California have written in protest of this RHNA process. How can this be acceptable to Northern California?

THERE IS A BETTER WAY! Reject the unreliable RHNA Allocation Methodology. Take time to collaborate with locally elected officials and community leaders to get it right. With accuracy and collaboration, housing needs can be solved.

Sincerely,

Michael Nash



## Development plans

winreis@gmail.com <[REDACTED]>

Thu 11/26/2020 1:39 PM

To: Regional Housing Need Allocation <rhna@bayareametro.gov>

**\*External Email\***

I urge you to reject the proposed RHNA Methodology until the accuracy of the housing numbers is confirmed, the assumptions are aligned with the reality of state (not national) trends in a post-COVID world; and the legality of the decision is determined

## Housing changes changed due to Covid

Andrea McCutchin <[REDACTED]>

Thu 11/26/2020 12:21 PM

To: Regional Housing Need Allocation <rhna@bayareametro.gov>

\*External Email\*

Dear Board Members,

Now is not the time to be doling out more mandated housing numbers to cities. Any development mandates given during this time could only benefit developers and labor unions.

We are in a time of huge transition with Covid-19. Covid will change tge way and where future generations will work - remotely, and not in a high density, congested city. Everyone knows someone who is leaving the Bay Area. Rents are plummeting in smaller cities and San Francisco. If rents are discounted then multiple months of free rent are included in the back end of a lease. You can't give away new units, whether rental or for purchase if they are a condo or smaller. NO ONE WANTS IT. They want the space that R1 housing provides - and they are moving to find it.

You will kill the souls of these cities to mandate development that most developers can't get to pencil out if they have no takers.

The time to be responsible is now. We can not act as if this change is not here - and making huge ripples. We need to see what the reality is in regard to need before requiring new mandates.

Most recently, the EDD acted without using a magnifying glass to carefully examine their actions and consequences. I ask that you be cognizant of the moves you make in this turbulent time, to ensure they don't cause the kind of regret that more consideration (and TIME) could easily prevent.

Sincerely, Andrea Mccutchin

Sent from my iPhone

*Tag: Proposed RHNA Methodology and Subregional Shares*

Fred Allebach

Member of the Sonoma Valley Housing Group

11/25/20

To: ABAG-MTC Public Information Office

e-mail to [RHNA@bayareametro.gov](mailto:RHNA@bayareametro.gov)

Comments due 11/27

**Public comment on 6<sup>th</sup> Cycle Proposed RHNA Methodology and Draft Subregional Shares of Regional Housing Need.**

**Abstract:** For the 6<sup>th</sup> RHNA cycle, I strongly suggest keeping the Sonoma County total Option 8A number of 17,543 for whatever scenario. The County needs to buck up on housing. I suggest shifting a large portion or all of Sonoma County's Option 8A unincorporated allocation of 5,257 back onto County cities. Shift the approximately 230 City of Sonoma growth management ordinance units in its southern sphere of influence from the County to the City's RHNA Option 8A allocation. With Sonoma's existing Option 8A allocation of 330 plus 230 from its sphere, this shift would total of 560 for a revised City Option 8A number. A \$25,000 City housing study resulted in an informed citizen's 6<sup>th</sup> cycle recommendation of 725 units with 52% being deed restricted; there is local backing for higher numbers.

Dear ABAG Regional Planning Committee,

I see the RHNA process as caught between conflicting priorities. The clear need to address Bay Area segregation and gentrification negatives runs up against widely accepted "smart growth" theory. Smart growth memes, along with LAFCO law, artificially tight spheres of influence, UGBs, green separators, wildland urban interface arguments, and in-city protective zoning all serve to rigidly limit chances to integrate Bay Area municipalities. All the great HCD, ABAG, and RHNA social equity goals run up against the latter intentional blockades plus local, in-city protectionism and character NIMBYism. In aggregate, social equity in housing runs up against Sonoma's Green Checkmate.

Option 8A reduced the City of Sonoma's RHNA allocation from approximately 480 to 330, but it also gave Sonoma County as a whole an allocation of 17,543. I'm writing now encourage you to keep the 17,543 number and **shift a large portion or all of Sonoma County's Option 8A, 5,257 unincorporated allocation back onto County cities.**

I wrote a public comment in support of the pre-Option 8A RHNA methodology that had given the City of Sonoma the 480 number. I cited multiple policy and data-driven social equity supporting documents and local studies showing the extent of local segregation in Sonoma Valley, where the Springs area stands out like a sore thumb of poverty amidst an island of Sonoma's wealth.

Tax Credit Opportunity Area maps (2020 and 2021) are frankly not granular and accurate enough to show the actual wealth disparities in Sonoma Valley. The maps show a High Opportunity area (Buena Vista/ Lovall Valley Rd area) that can't possibly be developed for any housing equity because of UGB and SOI limitations, even though McMansions are going in this area on city water. Do wealthy foothill areas just get to skate on equity? Who pays their equity debt?

The upward wealth trend here in Sonoma and surrounding unincorporated foothill areas has vastly increased Sonoma's predominantly white property owners home values, drawn in Silicon Valley speculators. Incentives for local protectionism have increased. This while local municipal fragmentation between the City and Springs keeps the Springs on the other side of the tracks in a plantation kind of arrangement.

Smaller cities in Sonoma County have all the reasons why to not take on an aggressive integration program, and these reasons center on anti-growth character and property value protection. These are the exact same reasons that has led to some of the worst segregation in the country in the Bay Area. All the green protection, NIMBYism, and smart growth adds up to the liberal's rationale for segregation.

The facts of segregation are plain to see on the ground in Sonoma Valley. From 2000-2020, the City of Sonoma underbuilt moderate, low and very low units by 236 and overbuilt above moderate by 293, these numbers are verbatim from RHNA website data. This while nearly half of the 15,000 person unincorporated Springs population lives in Census-demonstrable poverty. The vastly disproportional Covid-19 impact on local Latino population "essential workers" is a clear indicator of the inequity here, and why the City of Sonoma needs to pay its past RHNA debt and take more of its fair share of the local housing burden going forward.

In the city's own \$25,000 Housing Our Community series, the public recommended 725 new units for the next RHNA cycle with 52% being deed-restricted affordable.

It's time to eat into some of the very ample green space in Sonoma County. There is enough open space to sacrifice some city sphere of influence areas by annexing them into cities. Nothing but half measures will happen if ABAG and the state does not force a more aggressive race and class integration program.

**For the 6<sup>th</sup> RHNA cycle, I strongly suggest keeping the total Option 8A number of 17,543 for Sonoma County.** Let the County shift a lot or all of its unincorporated allocation to its cities. Make cities deal with annexations into their spheres of influence. Infrastructure extensions are reasonable; cities have to figure out how to pay for it; otherwise we are all condemned to an apparently reasonable world of suburban apartheid. Open the castle gates here! We are not talking "growth" and "sprawl"; we are talking re-accounting for the displaced working class, and excluded brown-skinned people. Higher RHNA numbers means Sonoma is paying societal debts that need to be paid.



The Option 8A unincorporated Sonoma County number of 5,257 will put tremendous pressure on unincorporated urban service areas like the Springs if they're asked to build that much housing. The Springs area has 166 affordable units in process now that will likely be permitted before the current RHNA is certified. The Springs is also smack dab up against the wildland urban interface. This area is already cost burdened and limited geographically.

It would be fairer if cities like Sonoma took on the burden they have heretofore avoided. It would be sensible if future development here went out onto the valley floor, away from overt mountain front fire danger, and on a clear connective axis with the local county Sanitation District infrastructure. Without aggressive rezoning, and in-city affordable housing development by right with concomitant CEQA streamlining to neutralize NIMBY protectionism, the only clear pragmatic path to meet higher RHNA numbers is through high density sphere of influence annexations.

**I suggest shifting the approximately 230 City of Sonoma growth management ordinance units in its southern sphere of influence, from the County to the City's Option 8A 330 allocation, for a total of 560 for the city's revised Option 8A number. 560 is 165 units less than the 725 units an engaged public here already recommended.**

[REDACTED]

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**From:** Don Teeter [REDACTED] >  
**Sent:** Thursday, November 19, 2020 11:05 AM  
**To:** Regional Housing Need Allocation  
**Subject:** RHNA

**\*External Email\***

Enough of this. You have already made my neighborhood all but unlivable because of unrealistic low cost expansions. I live on Louis Rd and it sometimes almost impossible to cross the street. There are seven children living within five houses of mine and it is just a matter of time that a disaster may occur. Palo Alto does not need any new building, low cost or not.

Don Teeter

[REDACTED]

## No Mandates for Cities During This Time!

Lisa Taner <[REDACTED]>

Thu 11/26/2020 9:31 AM

To: Regional Housing Need Allocation <rhna@bayareametro.gov>

**\*External Email\***

Dear Board Members,

Now is not the time to be doling out more mandated housing numbers to cities. Any development mandates given during this time could only benefit developers and labor unions.

We are in a time of huge transition with Covid-19. Everyone knows someone who is leaving the Bay Area. Rents are plummeting in smaller cities and San Francisco. You can't give away new units, whether rental or for purchase if they are a condo or smaller. NO ONE WANTS IT. They want the space that R1 housing provides - and they are moving to find it.

You will kill the souls of these cities to mandate development that most developers can't get to pencil out if they have no takers.

The time to be responsible is now. We can not act as if this change is not here - and making huge ripples. We need to see what the reality is in regard to need before requiring new mandates.

Most recently, the EDD acted without using a magnifying glass to carefully examine their actions and consequences. I ask that you be cognizant of the moves you make in this turbulent time, to ensure they don't cause the kind of regret that more consideration (and TIME) could easily prevent.

Sincerely,

Lisa Taner  
4th Generation Bay Area



11/24/20

## TRAINWRECK

Problems Created by ABAG's RHNA Housing Allocations for Unincorporated Santa Clara County



### Rural Santa Clara County Is Threatened by RHNA-Related Development

Over 4,100 new housing units should be built within unincorporated areas of Santa Clara County – more than half of them within areas that are currently rural – according to the Regional Housing Needs Assessment (RHNA) process administered by the Association of Bay Area Governments (ABAG).

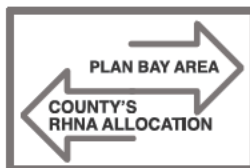
That's almost 4,000 units more than the County's previous allocation during the last RHNA round – and it poses a serious threat to our ability to address current challenges and achieve future goals, including those related to increasing climate resilience.



### It's a Land Use and Environmental Trainwreck in the Making

ABAG's ill-advised RHNA housing allocation to the County, if not reduced to a reasonable level, will create chaos and uncertainty regarding longstanding, countywide urban development and rural area land use policies that support Plan Bay Area's goals.

ABAG's proposed RHNA allocation could lead to a public policy "trainwreck" that accomplishes nothing – not for housing affordability, not for climate resilience, not for social and economic equity, not for Plan Bay Area, and not for Santa Clara County.



### RHNA Allocation Runs Contrary to Goals of Plan Bay Area

ABAG's Plan Bay Area calls for accommodating the region's future growth and development within existing urban areas at higher densities that can be better served by transit. It also discourages new greenfield development on our farmlands and fire-prone hillsides. It is intended to achieve a variety of social, economic, and environmental goals.

If Santa Clara County were to plan for rural area development in accordance with its RHNA allocation, the results would be the exact opposite of Plan Bay Area's basic goals.



### ABAG's RHNA Process is Broken

ABAG's RHNA process has a fundamental flaw – it fails to take into account Santa Clara County's unique, longstanding countywide urban development policies that state that urban development should occur only within cities – not in rural unincorporated areas under the County's land use jurisdiction. It treats the County as though it were a city.

Building a significant amount of new housing units in rural unincorporated areas would be directly contrary to basic urban development policies agreed to by the County, its 15 cities, and the Local Agency Formation Commission (LAFCO) almost 50 years ago.



### It's ABAG's Problem to Fix

It has been suggested that the County should solve this RHNA problem by asking its cities to voluntarily accept its RHNA allocation. That's putting the responsibility on the County to solve a problem created by a flaw in ABAG's RHNA process.

If that voluntary approach fails to bring the County's allocation down to levels achievable within the framework of current, longstanding, countywide urban development policies, ABAG should act responsibly and reallocate the great majority of the County's unincorporated areas RHNA allocation to urban areas within cities.

ABAG created the problem. ABAG needs to own it. ABAG needs to fix it.

[REDACTED]

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**From:** Bill Paisley <[REDACTED]>  
**Sent:** Thursday, November 19, 2020 12:45 PM  
**To:** Regional Housing Need Allocation  
**Cc:** Sharon Rushton  
**Subject:** Proposed RHNA Methodology  
**Attachments:** ACTION ALERT! Send letters to ABAG Executive Committee regarding the ABAG's Proposed RHNA Methodology (1).zip

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**\*External Email\***

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President Arreguin, ABAG

I agree and endorse the letter written by Sharon Rushton, Chairperson of the Sustainable TamAlmonte organization to Mayor Jesse Arreguin, President ABAG. A copy of the letter is attached.

Bill Paisley.

[REDACTED]

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**From:** Fred & Jean Schmidt [REDACTED] >  
**Sent:** Thursday, November 19, 2020 3:39 PM  
**To:** Regional Housing Need Allocation  
**Subject:** I don't get it?

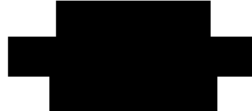
**\*External Email\***

Our traffic suck, we have major water issues, and brown and black out because of our power issues.

Who on earth wants' to make things worse?

In ten years the peninsula will look like a third world country.

Fred Schmidt



**From:** Heather [REDACTED] >  
**Sent:** Tuesday, November 3, 2020 10:41 AM  
**To:** Fred Castro <fcastro@bayareametro.gov>  
**Subject:** Public Comment on Housing Allocation

**\*External Email\***

Dear Association of Bay Area Governments (ABAG):

Please STOP building in the city of Alameda, California. I like living in a small town.

Sincerely,  
Heather Zacks  
[REDACTED]

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[REDACTED]

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**From:** c.dreike <[REDACTED]>  
**Sent:** Saturday, November 21, 2020 8:12 PM  
**To:** Regional Housing Need Allocation; Therese W. McMillan; Alix Bockelman; Andrew Fremier; Brad Paul; Brian Mayhew  
**Subject:** Proposed RHNA Methodology and Subregional Shares

**\*External Email\***

**Therese McMillan, Alix Bockelman, Andrew B. Fremier, Bradford Paul, Brian Mayhew**

The ABAG staff should be absolutely ashamed of their behavior involving the RHNA allocations. The legislature has sent you poorly thought out rules, regulations and laws. ABAG is there for the benefit of the people, not the legislature. ABAG should therefore refuse to distribute the RHNA allocations until the legislature fixes the problems of which the staff is well aware.

Regards,  
Chris Dreike  
[REDACTED]

--

Scientists seek to understand what is, while engineers seek to create what never was. As the "Bad Astronomer" Phil Plait says, "Teach a man to reason, and he can think for a lifetime."



## Eli Kaplan

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**From:** c.dreike <c.dreike@verizon.net>  
**Sent:** Tuesday, November 24, 2020 7:54 PM  
**Subject:** Important message about your neighborhood

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### \*External Email\*

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Whether you are a homeowner, renter or apartment dweller, the information below is to let you know that the price of rent and homeownership in California will **increase** due to the legislature's desire to **control housing**. If you don't live in California, beware as Congress is working on housing bills that will be as onerous as those in California. See the YIMBY bills HR4351 and S1919.

The youtube link below is a zoom video presentation by Torrance City Council Member Mike Griffiths. You don't need to watch to whole thing, just the first 12-13 minutes to understand what the California State Legislature is trying to do, which is to take away single family home neighborhoods and drive up the cost of homes and apartments even further, under the guise of affordable housing.

Whether you live in a house or an apartment, I hope you will take a stand on this issue as everything the legislature is doing will drive up the cost of housing. As far as I can tell, the game is to satisfy developers desire to build and to increase property values as fast as possible to increase property taxes to fill the gaping financial holes in the state and local budgets.

Call or write your **state** and **federal** representatives and ask them to vote NO on the housing and YIMBY bills.

Here is the link to Torrance City Council Member Mike Griffiths' video:  
<https://www.youtube.com/watch?v=Px8Z9nWX6-4&feature=youtu.be>

If you agree with what you see and hear, please forward this email to all your friends and relatives, especially those in California.

You can get more information at:

[www.facebook.com/localcontrolca/](http://www.facebook.com/localcontrolca/)

If you would like to volunteer to help CCLC , email me back. We have volunteers from around the state.

CCLC is having great success in that hundreds of local electeds have now joined with us in agreement.

Ask your city council to join CCLC to oppose the state takeover of local control.

And:

[www.LivableCalifornia.org](http://www.LivableCalifornia.org)

Regards,

Chris Dreike

for California Cities for Local Control

310-214-2175



[REDACTED]

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**From:** John Futini <[REDACTED]>  
**Sent:** Monday, November 23, 2020 4:26 PM  
**To:** MTC-ABAG Info  
**Subject:** Re: Too many houses for Napa.

**\*External Email\***

Hello ABAG,

As a longtime City of Napa resident, since 1965, I am putting in my "two cents' worth" in regard to the 3,816-housing unit order forced upon Napa County. Napa County is one of the few precious areas in which unique ecology and unparalleled natural vistas remain on the periphery of the metropolitan bay area. Nearly 4,000 new housing units will impair the better-quality of life for which far too much population growth has already done to most bay area cities and counties. ABAG needs to shelve its above decree. Thank you for your kind attention.

Sincerely yours,

John Stephen Futini, Longtime Napa resident.

[REDACTED]

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**From:** Judy Schriebman [REDACTED]  
**Sent:** Wednesday, November 25, 2020 10:09 AM  
**To:** Regional Housing Need Allocation  
**Subject:** RHNA numbers

**\*External Email\***

I strongly urge you to reject the proposed RHNA Methodology until the accuracy of the housing numbers is confirmed, the assumptions are aligned with the reality of *state* (not national) trends in a post-COVID world; and the legality of the decision is determined.

At this point, we are at risk of ruining our precious environment due to the greed of developers, builders and the banks and the ignorance of people in general on the unsustainability of perpetual growth.

Judy Schriebman  
[REDACTED]

[REDACTED]

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**From:** Richard Placone [REDACTED] >  
**Sent:** Wednesday, November 25, 2020 11:55 AM  
**To:** Regional Housing Need Allocation  
**Subject:** Fw: Reject RHNA Methodology

**\*External Email\***

*We urge you to reject the proposed RHNA Methodology until the accuracy of the housing numbers is confirmed, the assumptions are aligned with the reality of state (not national) trends in a post-COVID world; and the legality of the decision is determined.*

Richard and Jeanne Placone  
[REDACTED]

[REDACTED]

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**From:** Barry Smith [REDACTED] >  
**Sent:** Wednesday, November 25, 2020 12:28 PM  
**To:** Regional Housing Need Allocation  
**Subject:** Housing Requirements and Local Communities

**\*External Email\***

Dear President Arreguin and ABAG Executive Board Members:

I am totally confused by the process and rationale by which local communities are required to build more housing, even if that means running roughshod over local building and zoning requirements.

If local communities are willing to accept their local limitations, aren't the citizens voting for what they want?

Perhaps you could work more closely with the local communities to understand their wishes, rather than telling them what they need to do.

Regards,  
Barry Smith

Barry Smith | [REDACTED]

**Eli Kaplan**

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**From:** CoCoTax <denise@cocotax.org>  
**Sent:** Wednesday, November 25, 2020 1:18 PM  
**To:** Regional Housing Need Allocation  
**Subject:** RHNA Methodology

**\*External Email\***

*I urge you to reject the proposed RHNA Methodology until the accuracy of the housing numbers is confirmed, the assumptions are aligned with the reality of state (not national) trends in a post-COVID world; and the legality of the decision is determined.*

*Contra Costa Taxpayers Association  
Susan L Pricco, President*



November 18, 2020

Mayor Jesse Arreguín, President  
Executive Board, Association of Bay Area Governments  
375 Beale Street, Suite 700  
San Francisco, CA 94105

RE: Comments on Implications of the new Bay Area “RHNA” and Support for Option 8A RHNA Methodology using the Plan Bay Area 2050 Households Baseline with the Equity Adjustment

Dear President Arreguín and ABAG Executive Board,

The Council of Community Housing Organizations is a coalition of 23 affordable housing developers and advocates in San Francisco. We are also part of the regional Six Wins for Social Equity Network. CCHO Co-Director Fernando Martí was an appointed member of ABAG’s Housing Methodology Committee for the RHNA Update process.

**CCHO strongly supports ABAG’s proposed RHNA methodology, known as the “High Opportunity Areas Emphasis & Job Proximity” methodology (“Option 8A”), using the Plan Bay Area 2050 Households baseline, with an equity adjustment.**

While no methodology is perfect, Option 8A represents a sound compromise from the ABAG Housing Methodology Committee. ABAG adopted the Committee’s recommendation due to its strong performance on the statutory objectives of RHNA. A clear majority of the Housing Methodology Committee also supported an equity adjustment. The HMC met every month for a whole year, diving deep into the technical details of all the possible factors and metrics of evaluation and making compromises along the way. This was a significant investment. We urge you to continue to respect the integrity of this process and move forward with the Committee’s recommendation, with the equity adjustment. We strongly urge ABAG to reject alternatives, such as changing the baseline, that perform worse on the statutory objectives’ performance metrics.

The “Access to High Opportunity Areas” factor allocates more homes in jurisdictions with quality jobs, adequately-resourced schools, and minimal pollution. This will require jurisdictions that have mostly zoned for single-family homes to now zone for multi-family housing to meet the very low- and low-income allocations.

Furthermore, at the Housing Methodology Committee’s final meeting on September 18, more than half of the committee supported an equity adjustment to ensure that each exclusive jurisdiction receives a share of the region’s very low and low-income allocations that is at least proportional to the jurisdiction’s share of the region’s total number of households. Many members of the ABAG Executive



Board also stated at the October 15th hearing that meeting the statutory objectives of RHNA and advancing racial equity were critical and worthy of potential improvements to the methodology.

The purpose of the RHNA is to ensure every city and county does its fair share to accommodate the region's housing growth over 8 years. The last RHNA cycle perpetuated patterns of racial segregation, allocating a greater share to the big three cities, far above the regional share of households, and allocating a far lower share to the suburbs. Now is the time to adopt a RHNA that will ensure inclusivity and prosperity for everyone -- by combating racial segregation.

That said, **there are significant concerns with implications of this new Bay Area RHNA for urban gentrifying communities** that we must not forget in the shadow of this current wrangling over methodology options. Without acknowledging Sensitive Communities at the local level, which has now been definitely analyzed by UC Berkeley's Urban Displacement Project ([sensitivecommunities.org](https://sensitivecommunities.org)) and the potential consequences of SB35 by-right market-rate development exacerbating land costs in gentrifying communities, we may see regional segregation and displacement increasing at a faster rate than the region is able to open new opportunities in some high-opportunity areas. This would be a perverse outcome of the RHNA Update that no amount of methodological tweaking at the ABAG level could mitigate nor through local housing element updates which have even less influence on these numbers handed down by The State. The potential threats to low-income and communities of color vulnerable to gentrification and economic and racial displacement from the paired implications of SB35 and SB828 as they were designed in the State Legislature cannot be overstated as we go forward.

For the moment, this decision on adopting Option 8A will play a significant role in how our region moves forward out of this pandemic and into a more equitable future. We need every jurisdiction in the region to do its fair share in meeting the region's housing needs, helping to remove barriers to housing choice for people of color. These two issues, opening opportunities in high-resource areas and combatting regional displacement and segregation, will help our Bay Area residents choose their home based on their needs, preferences, and access to resources, not their racial or economic background.

Sincerely,

A handwritten signature in blue ink that reads "Fernando Martí". The signature is stylized with a long horizontal line extending from the end.

Fernando Martí  
Co-Director, Council of Community Housing Organizations  
Member, Housing Methodology Committee of ABAG



Tomiquia Moss  
415-669-0344  
tmoss@allhomeca.org

November 18, 2020

Mayor Jesse Arreguin, President  
Executive Board, Association of Bay Area Governments  
375 Beale Street, Suite 700  
San Francisco, CA 94105

RE: Proposed Regional Housing Needs Allocation (RHNA) Methodology and Subregional Shares -  
**Support for Option 8A using the Plan Bay Area 2050 Households Baseline with the Equity Adjustment**

Dear President Arreguin and ABAG Executive Board,

On behalf of All Home, we are writing to provide comment on the proposed RHNA Methodology and subregional shares for ABAG RHNA Cycle 6.

All Home is a Bay Area organization that advances regional solutions towards disrupting the cycles of poverty and homelessness and creating more economic mobility opportunities for extremely low-income (ELI) people. We work across counties, sectors, and silos to advance coordinated, innovative solutions and build a movement to challenge the status quo that perpetuates homelessness.

We strongly support ABAG's proposed RHNA methodology, known as the **"High Opportunity Areas Emphasis & Job Proximity" methodology ("Option 8A")**, **but believe the methodology should be amended to include the equity adjustment** to more fully meet the statutory objective of affirmatively furthering fair housing.

This adjustment will result in thousands more affordable units in high-opportunity neighborhoods. It is imperative that we hold ourselves and each other accountable to create a more inclusive Bay Area, one that redresses racial disparities that were caused by more than a century of racially motivated zoning and real estate development practices that promoted segregation and lack of access to opportunity. All Home can support nothing less than a methodology that creates access for all residents to have a safe and affordable home and equal access to environmental, economic, and educational opportunities.

ABAG adopted the Housing Methodology Committee's recommendation due to its strong performance on the statutory objectives of RHNA. A majority of the Committee also supported an equity adjustment. The RHNA process offers our region a tangible opportunity to actively plan for our future housing needs

for the next eight years — while actively designing strategies to address existing housing affordability, patterns of residential segregation, and exclusionary zoning practices.

**Therefore, we stand with a strong and diverse coalition of stakeholders to strongly urge ABAG to respect the integrity of this process and move forward with the Committee's recommendation, including the equity adjustment.** We request that you reject alternatives that fail to meet the moral imperative of our time, such as changing the baseline, that perform worse on the statutory objectives' performance metrics and will likely result in further displacement, segregation and racial exclusion. Alternative proposals that use Plan Bay Area 2050 Growth as the baseline, for example, fail to meet the statutory objective to affirmatively further fair housing and will exacerbate our region's affordable housing crisis and fail to hold jurisdictions accountable for producing their fair share of affordable housing. Now is the time for the whole Bay Area, all cities and counties, to come together to right the wrongs of the past, move to a fairer and equitable future, and hold each other accountable for producing a fair distribution of affordable housing.

ABAG's proposed methodology with the Equity Adjustment will help us get there. For these reasons, All Home strongly supports **Option 8A** using the Plan Bay Area 2050 **Households** Baseline with the **Equity Adjustment**.

Thank you again for the opportunity to provide feedback.

Sincerely,

*Tomiquia Moss*

Tomiquia Moss  
CEO and Founder

Cc: ABAG Executive Board



November 20, 2020

Mayor Jesse Arreguin, President Executive Board  
Association of Bay Area Governments  
375 Beale Street, Suite 700  
San Francisco, CA 94105

Submitted via email to [RHNA@bayareametro.gov](mailto:RHNA@bayareametro.gov)

**Re: Proposed RHNA Methodology and Subregional Shares - Concern Regarding Overallocation to Unincorporated Counties**

Dear President Arreguin and ABAG Executive Board,

The undersigned organizations write today to express concern regarding the significantly increased allocations to unincorporated areas in the recommended housing allocation methodology - Option 8A - for the Regional Housing Needs Allocation (RHNA) Cycle 6 and its potential to impact the natural and working lands of our region. Thank you for this opportunity to communicate our views.

Since its first adoption in 2013, Plan Bay Area has served as the urban growth blueprint for the Bay Area, which focuses regional growth around transportation infrastructure through its Priority Development Area (PDA) program, and strives to provide equitable outcomes to all Bay Area residents. The Priority Conservation Area (PCA) program has created avenues to enhance regionally significant natural landscapes, public access, and habitats surrounding the built environment, and to provide respite for the densifying PDAs (Attachment 1). The vision set out by Plan Bay Area is one that seeks balance between growth in the built environment and sound stewardship of the vital resources provided by our natural and working lands, such as clean air, clean water, food, and access to nature. These Priority Conservation Areas also provide critical ecosystem services to support denser urban and suburban areas that recharge groundwater aquifers, uptake millions of tons of carbon from the atmosphere while producing oxygen, reduce downstream flooding risk, maintain clean fresh water within creeks and waterways, support local food production, and protect sensitive/rare/endemic plants and wildlife including key pollinators. The vision set out by Plan Bay Area is one that seeks balance between growth in the built environment and the vital resources and services provided by our natural and working lands.

Supporting regional and statewide objectives to address the housing crisis we face in California is vitally important. To this end, we strongly support strategies to promote urban infill, support climate smart transportation initiatives, and to leverage nature-based solutions to climate threats, which are solutions that typically provide multiple benefits to communities, such as increased livability, more equitable access to nature, and improved habitat for wildlife, water, and food production. We support continued evaluation of housing needs and further refinement of Plan Bay Area to better meet SB 375 (Steinberg, 2009) goals. **However, we see within the recommended housing allocation methodology, an enormous increase of housing allocations to**

**unincorporated counties, which will inevitably pressure local governments and cities into zoning lands that are inappropriate for housing in order to meet those requirements.**

For example, in unincorporated Santa Clara County alone, the allocation of housing units increased from 277 units in RHNA 5 to 4,137 for RHNA 6, representing a nearly 1,400 percent increase. Other unincorporated counties are projecting similar drastic increases through the proposed methodology:

| <b>Unincorporated County</b> | <b>RHNA 5<br/>Allocation</b> | <b>RHNA 6<br/>Allocation</b> | <b>% Increase</b> |
|------------------------------|------------------------------|------------------------------|-------------------|
| Alameda                      | 1,769                        | 4,530                        | 156%              |
| Contra Costa                 | 1,367                        | 5,827                        | 326%              |
| Marin                        | 185                          | 3,820                        | 1,965%            |
| Napa                         | 180                          | 792                          | 340%              |
| San Mateo                    | 913                          | 2,933                        | 221%              |
| Santa Clara                  | 277                          | 4,137                        | 1,394%            |
| Solano                       | 103                          | 1,016                        | 886%              |
| Sonoma                       | 515                          | 5,257                        | 921%              |

**We are very concerned that such high allocations for unincorporated areas, which are primarily rural, agricultural, or open space, will significantly increase pressure to zone for housing in areas at high risk for fire, over PCAs, on productive agricultural lands, or proximate to critical habitat linkages (Attachment 2).** We also know the proximity of concentrated growth near critical habitat raises a host of issues, like the potential loss of adjacent habitat, habitat fragmentation, and increased use of rodenticides with their collateral effects on predators like mountain lions and bobcats in the vicinity.

**Furthermore, we see these allocations as running counter to objectives stated in state housing element code Section 65584(d)(2)<sup>1</sup>:**

*(2) Promoting infill development and socioeconomic equity, the protection of environmental and agricultural resources, the encouragement of efficient development patterns, and the achievement of the region's greenhouse gas reductions targets provided by the State Air Resources Board pursuant to Section 65080.*

The goal of Plan Bay Area, per SB 375, is to reduce greenhouse gas emissions by focusing housing near jobs and transit. The allocation of significant increases in housing units to the unincorporated (rural) counties accelerates sprawl, which is exactly counter to the strategic goals Plan Bay Area is trying to achieve. **Housing allocations must be consistent with the intent to stop greenfield development, and instead practice smart growth strategies that apply infill construction within the existing urban footprint of our communities.**

Importantly, with the latest megafires serving as a backdrop, the potential for wildland fire embers to be carried by winds for miles into the built environment is well-documented. Homes in and near the wildland-urban interface (the WUI) are at particular risk if adequate defensible spaces and home hardening measures have not been taken (please see Attachment 3,4). **Increased, concentrated development in the WUI, incentivized by the pressure of high RHNA**

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<sup>1</sup> [http://leginfo.ca.gov/faces/codes\\_displaySection.xhtml?sectionNum=65584.&lawCode=GOV](http://leginfo.ca.gov/faces/codes_displaySection.xhtml?sectionNum=65584.&lawCode=GOV)

**allocations to unincorporated areas, does not follow best practices in mitigating the threat of catastrophic wildfire that risks lives and property.** A 2017 insurance analysis shows that almost 350,000 homes in the Bay Area are in areas at high or extreme risk of wildfire already.<sup>2</sup> We must avoid exacerbating this deadly problem by unintentionally spurring development in the WUI.

**For all of the reasons stated, while we support Option 8A and believe it furthers our environmental goals on the whole, we request that the additional housing allocations for unincorporated counties across the region be significantly reduced or eliminated, to maintain consistency with climate goals and strategies with Plan Bay Area and the State of California.**

We appreciate your consideration for these concerns and look forward to speaking with you should you have any questions.

Sincerely,

Ana M. Ruiz  
General Manager  
Midpeninsula Regional Open Space District

Annie Burke  
Executive Director  
TOGETHER Bay Area (Attachment 5)

Andrea Mackenzie  
General Manager  
Santa Clara Valley Open Space Authority

Megan Fluke  
Executive Director  
Green Foothills

Walter Moore  
President  
Peninsula Open Space Trust

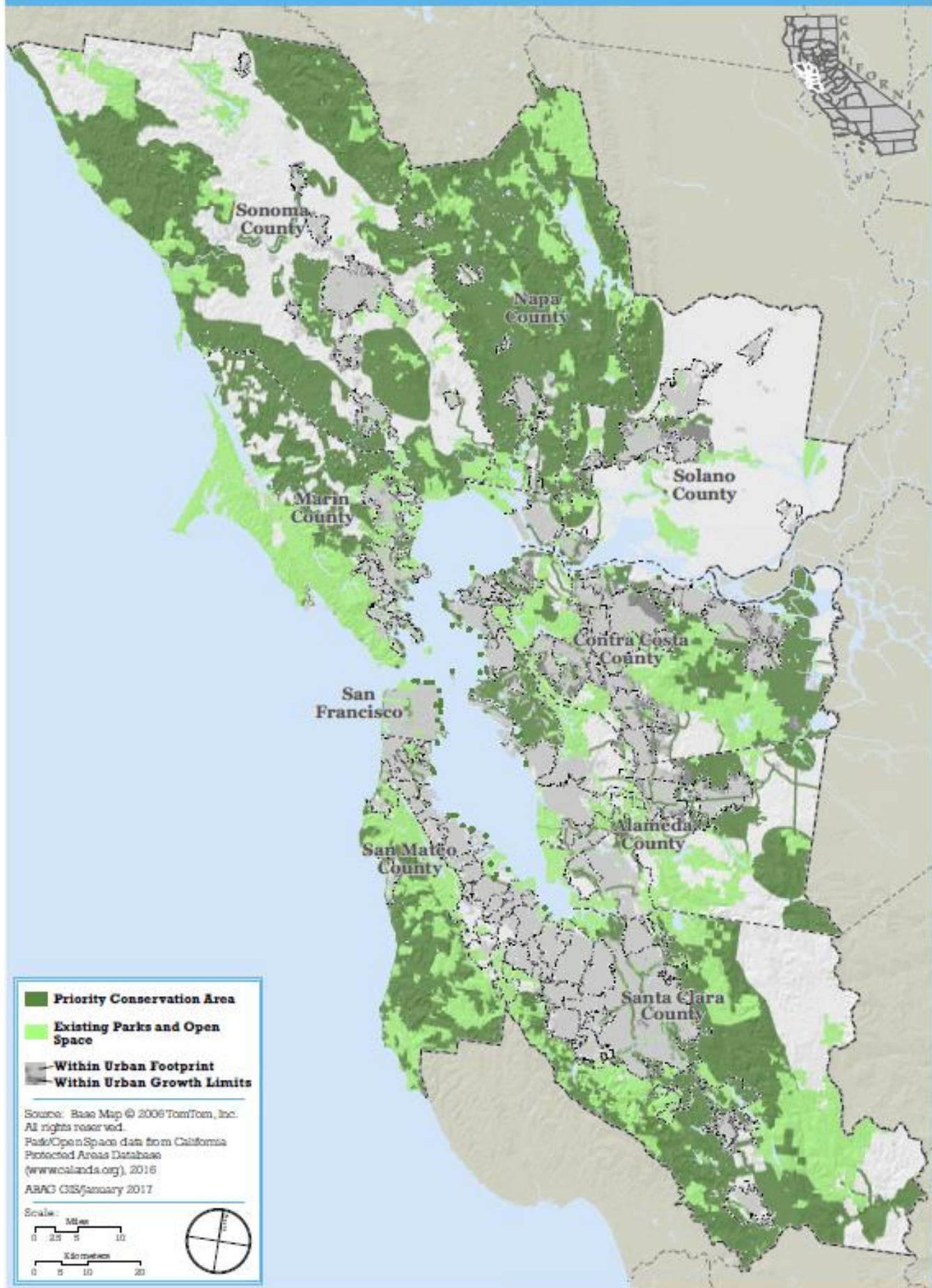
Attachments:

1. Bay Area PCA Map (ABAG)
2. Bay Area Critical Habitat Linkages (MROSD)
3. HCD/TCAC High Opportunity Areas and Wildland-Urban Interface Map (MROSD)
4. Bay Area Fire Hazard Severity Zone Map (CalFire)
5. Member list of TOGETHER Bay Area

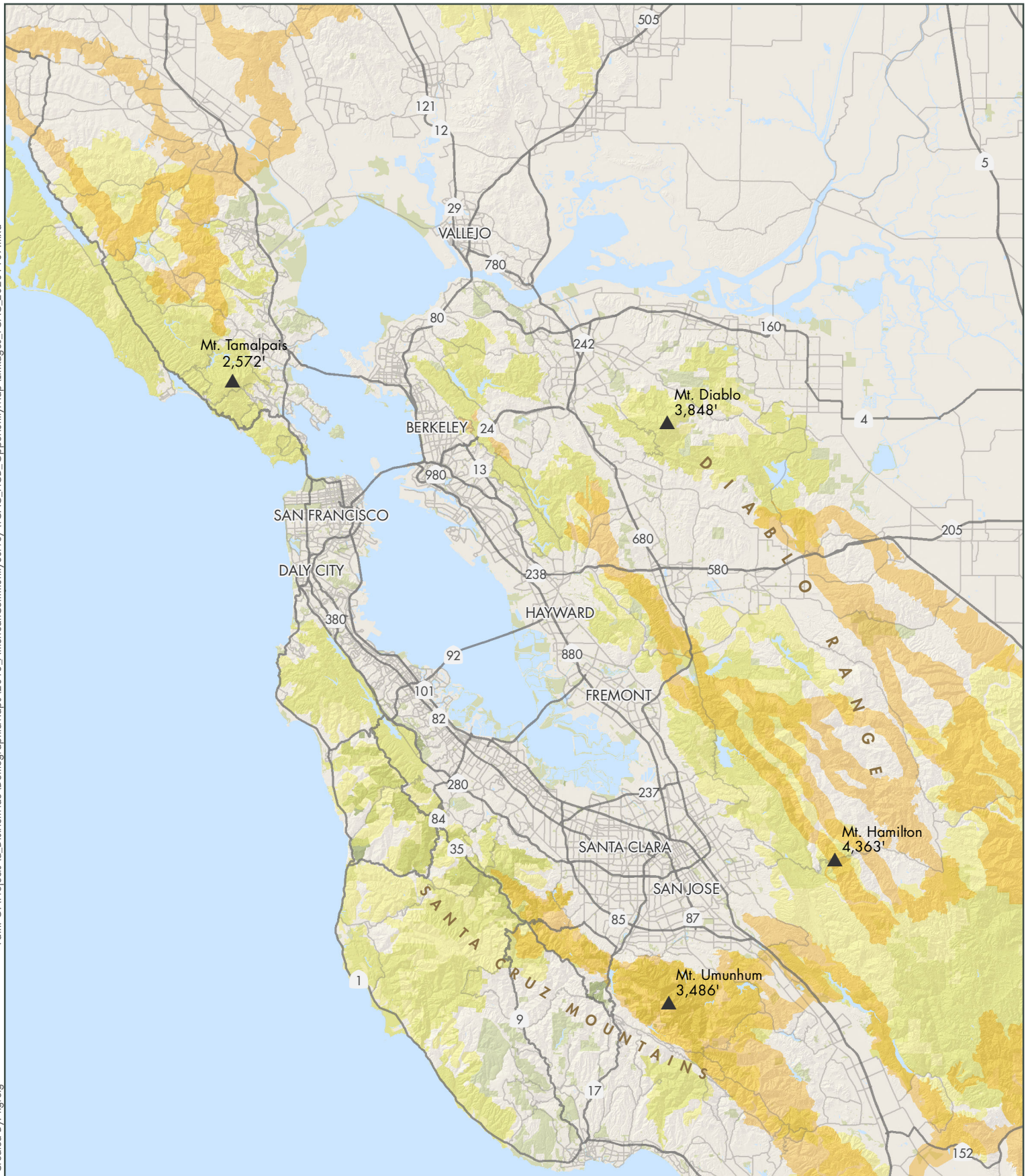
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<sup>2</sup> <https://www.sacbee.com/news/california/fires/article216076320.html>









## Bay Area Critical Linkages

- Midpen preserve
- Critical Wildland Linkage
- Other protected land
- Large Wildland Landscape Block
- Private land

Sources: Science and Collaboration for Connected Wildlands

Midpeninsula Regional  
Open Space District  
(Midpen)

11/9/2020



Miles  
0 5 10





Sources: California Tax Credit Allocation Committee,  
CAL FIRE Fire and Resource Assessment Program

## TCAC/HCD Opportunity Areas

|                    |                                       |                              |
|--------------------|---------------------------------------|------------------------------|
| <b>Opportunity</b> | Highest resource                      | Low resource                 |
|                    | High resource                         | High segregation & poverty   |
|                    | Moderate, resource (rapidly changing) | Missing or insufficient data |
|                    | Moderate resource                     |                              |

**FRAP WUI**

|                  |
|------------------|
| Midpen preserves |
| Influence zone   |
| Intermix         |
| Interface        |

Midpeninsula Regional  
Open Space District  
(Midpen)

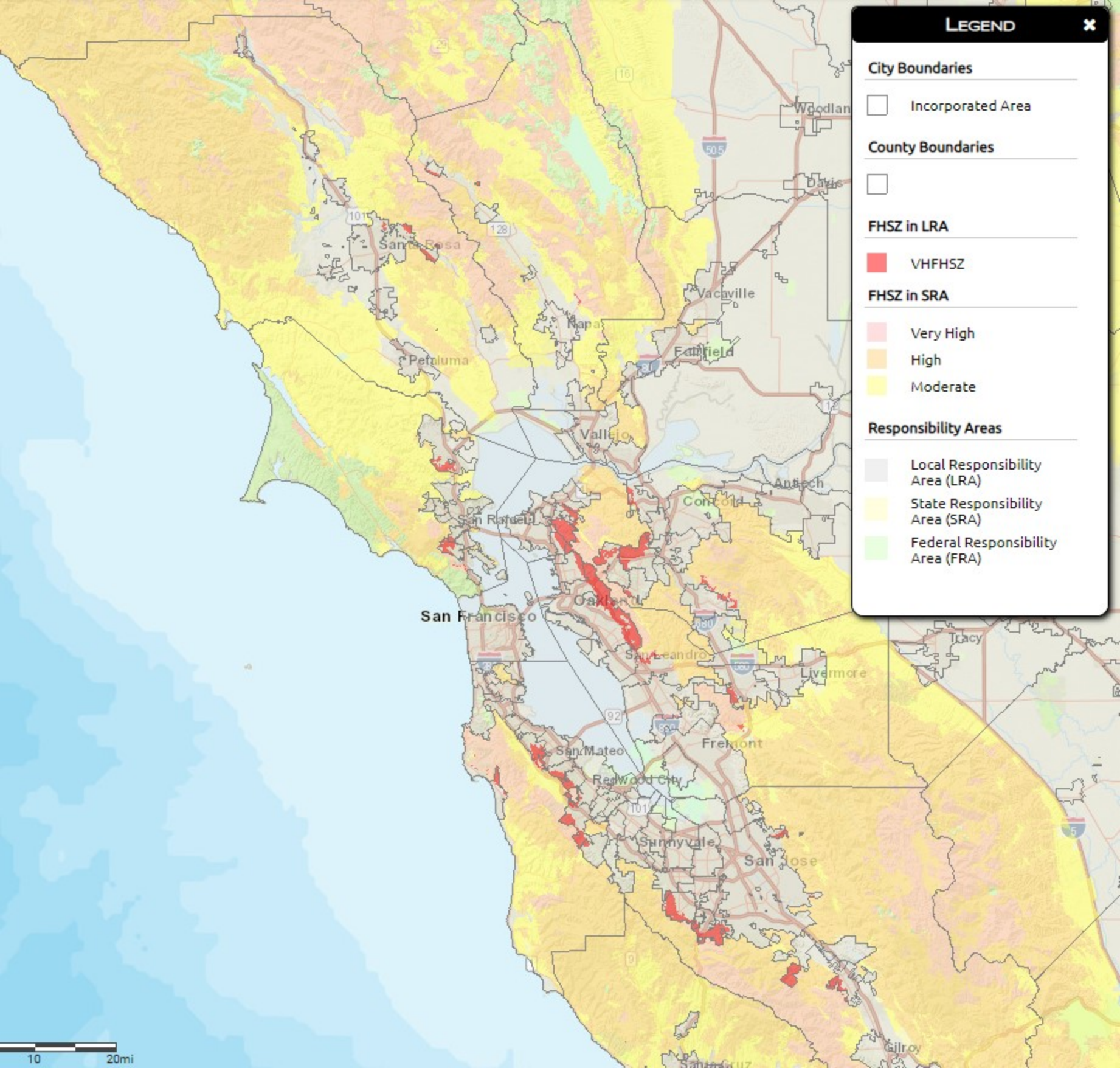


10/12/2020

Miles 0 5 10







# TOGETHER BAY AREA

## Founding Members

The following 65 public agencies, Indigenous Tribes, and nonprofits in the 10-county San Francisco Bay Area are Founding Members

[Alameda County Resource Conservation District](#)  
[Amah Mutsun Land Trust](#)  
[Bay Area Ridge Trail Council](#)  
[Brown Girl Surf](#)  
[Bull Valley Agricultural Center](#)  
[California Academy of Sciences](#)  
[California Invasive Plant Council \(Cal-IPC\)](#)  
[California Mountain Biking Coalition](#)  
[City of American Canyon](#)  
[Claremont Canyon Conservancy](#)  
[Coastside Land Trust](#)  
[David R. Brower, Ronald V. Dellums Institute for Sustainable Policy Studies](#)  
[East Bay Municipal Utility District](#)  
[East Bay Regional Park District](#)  
[East Contra Costa County Habitat Conservancy](#)  
[Friends of Five Creeks](#)  
[Golden Gate National Parks Conservancy](#)  
[Golden Hour Restoration Institute](#)  
[Grassroots Ecology](#)  
[Land Trust of Santa Cruz County](#)  
[LandPaths](#)  
[Mare Island Heritage Trust](#)  
[Marin Conservation League](#)  
[Marin Agricultural Land Trust](#)

[Marin County Parks](#)  
[Marin County Bicycle Coalition](#)  
[Marin Municipal Water District](#)  
[Marin Open Space Trust](#)  
[Midpeninsula Regional Open Space District](#)  
[Mountain Bikers of Santa Cruz](#)  
[Muwekma Ohlone Tribe of the San Francisco Bay Area](#)  
[Napa County Regional Park and Open Space District](#)  
[National Park Service – Golden Gate National Recreation Area, Rosie the Riveter/WWII Home Front NHP](#)  
[Oakland Parks and Recreation Foundation](#)  
[Paula Lane Action Network \(PLAN\)](#)  
[Peninsula Open Space Trust](#)  
[Pie Ranch](#)  
[Rails-to-Trails Conservancy](#)  
[River Otter Ecology Project](#)  
[San Francisco Bay Trail](#)  
[San Francisco Public Utilities Commission](#)  
[San Francisco Recreation and Parks Department](#)  
[San Mateo County Parks](#)  
[San Mateo County Parks Foundation](#)  
[San Mateo Resource Conservation District](#)

[Santa Clara County Parks and Recreation Department](#)  
[Santa Clara Valley Open Space Authority](#)  
[Santa Cruz County, Parks, Open Space & Cultural Services](#)  
[Save Mount Diablo](#)  
[Save the Redwoods League](#)  
[Sempervirens Fund](#)  
[Solano Land Trust](#)  
[Sonoma County Ag + Open Space](#)  
[Sonoma County Regional Parks](#)  
[Sonoma Land Trust](#)  
[Sonoma Water](#)  
[Student Conservation Association \(SCA\)](#)  
[Sustainable Agriculture Education \(SAGE\)](#)  
[The California Urban Streams Partnership](#)  
[The Field Semester](#)  
[Tri-Valley Conservancy](#)  
[Urban Bird Foundation](#)  
[Valley Water](#)  
[YES Nature to Neighborhoods](#)  
[Youth Outside](#)

Please note, National Park Service members do not participate in our coalition's advocacy efforts.

[REDACTED]

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**From:** Cheriel Jensen <[REDACTED]>  
**Sent:** Tuesday, November 24, 2020 4:53 PM  
**To:** Regional Housing Need Allocation  
**Subject:** RHRN Numbers for Saratoga

\*External Email\*

Cheriel Jensen

[REDACTED]

[REDACTED]

November 24, 2020

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

Dear ABAG/MTC/RHNA Department:

The allocation of 2100 dwelling units to Saratoga is made by people who have not done the careful work of planning and siting homes in our city according to our environmental constraints. Fully half of Saratoga consists of steep hills with extreme fire danger, on-going soil creep, landslides, fault zones and faults. It has high rainfall compared to the valley floor. The other half of our land is in what is called the forebay meaning entry to the aquifer. Santa Clara County sits on a deep four level aquifer. This land we must leave open enough to percolate rainfall and recharge our aquifer. Unlike San Francisco and the East Bay which have taken command of substantial Sierra water supplies, we have not. Fifty percent of our Santa Clara County's water supply comes from local sources, basically our aquifer. Unlike the county in general, San Francisco, San Mateo and the East Bay, these agencies who own critical Sierra waters, most of the time 100% of Saratoga's water comes from this local aquifer system. Hence this forebay system is vital to our very life. As a planner by profession for San Jose and for the County of Santa Clara we experienced several multi-year droughts from early 70's, and learned the hard way what a fragile and critically important task is this aquifer recharge system.

We also learned the hard way the lessons of building homes on landslides, expansive soils and faults. A large number of homes were built on Boulder Creek in the San Jose Eastern hills in the 60s. As the hills were differentially weighted and lawns got watered, the land began to collapse. Houses began to collapse. Utilities had to be built above ground so when they failed it was visible and could be fixed right

away. Homes were rebuilt over and over. They continued collapsing about as fast as they were rebuilt. The roads were continually rebuilt by engineers who claimed they could conquer nature. Successive homeowners lost everything. The public paid and paid and paid for this mistake. Simoni Drive was next to fail in a similar manner.

Eventually the geotechnical work by USGS and private geologists, studying both sides of our Santa Clara valley, showed that our hillsides are not bedrock but pretty much unstable sands and expansive clay soils. If landsliding was not visible when development began, it soon would be. In addition, these hillsides are designated extreme high fire danger. Lesson learned, in the City of San Jose and then the County of Santa Clara we drew the urban limit lines at the 15 percent slope to keep development out of these risky areas. Saratoga came slightly later (1980) to lower densities in these highly unstable lands, and through a citizen initiative we lowered the allowable densities but we were already partly developed in these unstable lands. We continue to have major expenses rebuilding roads and legal liabilities for homes on unstable ground, but far less than it would be without our lower densities and restrictions. Contrary to the North Bay and Oakland Hills where development proceeded without the degree of caution warranted, we demonstrated our caution has markedly lowered the risk of massive loss and saved lives.

The flatter lands of Saratoga were designated by the SC Valley Water agency as forebay based on their role in percolating the rainfall into our aquifer. Some other cities in the county also have some forebay lands but Saratoga's gently sloping lands are almost entirely forbay. These forebay lands play a vital role in our restoring our aquifers so they can hold our water. Fifty percent of our county's water comes from this system, but almost 100% of Saratoga's water comes from pumping wells from the aquifer of this system. To accommodate this process, Saratoga has had a hardscape limit on development of 30% per parcel.

This proposal to somehow find land to build 2100 dwelling units would require building over much of the land that recharges the aquifer. Densifying development ignores this vital water process without handing us any water alternative. It was made by legislative fiat and ABAG/MTC without their examining the mapped hazards and resource maps and without understanding that our landscape is not just resource but also our critical support system.

Most important, it ignores the fact that our lands are now 99.95% developed in a pattern difficult to change and has been developed in that pattern with few exceptions for 40 years. In fact, this development has been in place, with few new developed lots since 1980 because our lands were already mostly built out by then. Saratoga population in 1980 was 29,261 and in 2020 was 30,311 (US Census).

Saratoga does not invite jobs. We have no industrial land to create jobs. We have almost no commercial land. We now have a single grocery store and hardware store for 30,311 people. Saratoga citizens have been the most responsible citizens anywhere with a very low birth rate, way below replacement. (Only 21% of our population was below the age of 18 in 2019, fewer than half the children in 1980 (then 44.2 percent below the age of 19).)

Saratoga does not create a local or regional housing demand. Saratoga population in 1980 was 4.6% Asian and in 2020 is 49.1 % Asian (US Census). Of our current population 30 % speak other than English. What this means is that the housing we have, has created housing for people coming from other countries to live here. Our housing now is not supporting either a general local need arising from our low birth rate, and even the even lower local Asian birth rate. Our housing as it is sold is primarily serving people from other counties driving up the prices so our own children and grandchildren must locate their lives elsewhere. This is an unsustainable demand and one that would put a broken strain on our resources. A third of the people of the world would probably like to live here. We love them and would welcome them all, but haven't the resources to serve such a demand.

We are being forced by others to destroy our water system and build on hazardous lands because others are not accountable for the demand they created? Now the whole of California has failed to control the housing demand they carelessly created without a thought of where all that water would be coming from, and where there is land available for building the housing for all those jobs?

The High-Rise Solution? Much of San Francisco has bedrock to support high rise buildings. But, in those areas of damp soils, liquefaction failure in even moderate earthquakes has been severe and failure even without earthquake activity is occurring in San Francisco due to not requiring high rises be actually supported on bedrock. Santa Clara County and Saratoga in particular have no bedrock. Saratoga has ridden out earthquakes fairly well as we had a low profile and have avoided developing on Faults. As we grow upwards the entire county will be extra susceptible to serious fault movement from the San Andreas extensive fault system and the Hayward/Calaveras fault systems. We know we sit beside and in places on those fault systems, but have chosen to locate much of the most vibrant parts of the U.S. economy right on these iffy liquefaction soils. This is a monumental mistake. As this industry builds higher it becomes more susceptible to earthquake losses.

We are being treated as if we have not done our homework. We have - extensively. Our decisions stem from years of effort to live within the limits of our resources, carefully avoid hazards, and welcome the people of the world, at the same time seeing that economic pressure from that welcome-matt send our children and grandchildren elsewhere to live. We cannot grow the way ABAG/MTC demands. We just don't have the land. MTC is not solving any transportation decisions that affect us, and should be disbanded. ABAG does nothing to help or improve our lives. And we do not see why we should try to do the impossible things ABAG/MTC have demanded. It solves nothing, just makes life more complicated and difficult. We are told we live in a Democracy but this is not true. We have no voice in these ridiculous impossible decisions.

We cannot do what you have demanded of us.

Yours truly,

Cheriel Jensen



**From:** Susan Kirsch <[REDACTED]>  
**Sent:** Wednesday, November 25, 2020 9:03 AM  
**To:** Regional Housing Need Allocation  
**Subject:** Reject RHNA Methodology

**\*External Email\***

November 25, 2020

Mayor Jesse Arreguin, President  
ABAG Executive Board  
c/o ABAG & MTC Public Information Office  
[RHNA@bayareametro.gov](mailto:RHNA@bayareametro.gov)

Dear President Arreguin and ABAG Executive Board Members:

**Summary:** Reject the proposed RHNA Methodology until the accuracy of the housing numbers is confirmed, the assumptions are aligned with the reality of state (not national) trends in a post-COVID world; and the legality of the decision is determined.

1. California's housing need isn't as great as the state claims. It is irresponsible to approve the Methodology until the approach to determine the numbers is proven reliable.

The Embarcadero Institute's report "[Double Counting in the Latest Housing Needs Assessment](#)" (September 2020) finds, "Use of an incorrect vacancy rate and double counting, inspired by SB-828, caused the state's Department of Housing and Community Development to exaggerate by more than 900,000 the units needed in SoCal, the Bay Area and the Sacramento area."

"The state's approach to determining the housing need must be defensible and reproducible if cities are to be held accountable. Inaccuracies on this scale mark the fact that cities and counties are surpassing the state's market-rate housing targets but falling far short in meeting affordable housing targets."

2. The assumptions of the RHNA Methodology are unreliable. It is irresponsible to approve the Methodology until the assumptions are aligned with the reality of COVID-19, remote work, changing transportation patterns, an exodus from California, and deepening economic upheaval.

3. RHNA Methodology that usurps local authority endowed to elected City Councils or Boards of Supervisors will not go unchallenged. Nor will community leaders, homeowners, and renters stand by as HCD foists irrational, wildly inflated housing quotas on communities. [CalMatters columnist Dan Walters](#), reporting about the Embarcadero Institute report writes, "resistance has developed among affected local governments and officials are mulling whether to challenge them in court."

**THERE IS A BETTER WAY!** Reject the unreliable RHNA Allocation Methodology. Take time to collaborate with locally elected officials and community leaders to get it right. With accuracy and collaboration, housing needs can be solved.

Sincerely,

***Susan Kirsch, Political Advisor  
Chair, Nix-the-Nine Campaign***





**From:** Lou Ann Bassan <[REDACTED]>  
**Sent:** Wednesday, November 25, 2020 9:31 AM  
**To:** Regional Housing Need Allocation  
**Subject:** REJECT proposed RHNA Methodology

**\*External Email\***

November 25, 2020

Mayor Jesse Arreguin, President  
ABAG Executive Board  
c/o ABAG & MTC Public Information Office  
[RHNA@bayareametro.gov](mailto:RHNA@bayareametro.gov)

Dear President Arreguin and ABAG Executive Board Members:

**Summary:** Reject the proposed RHNA Methodology until the accuracy of the housing numbers is confirmed, the assumptions are aligned with the reality of state (not national) trends in a post-COVID world; and the legality of the decision is determined.

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The Embarcadero Institute's report "[Double Counting in the Latest Housing Needs Assessment](#)" (September 2020) finds, "Use of an incorrect vacancy rate and double counting, inspired by SB-828, caused the state's Department of Housing and Community Development to exaggerate by more than 900,000 the units needed in SoCal, the Bay Area and the Sacramento area."

"The state's approach to determining the housing need must be defensible and reproducible if cities are to be held accountable. Inaccuracies on this scale mark the fact that cities and counties are surpassing the state's market-rate housing targets but falling far short in meeting affordable housing targets."

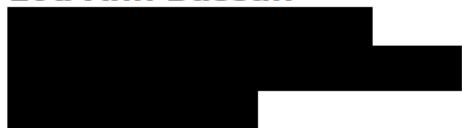
2. The assumptions of the RHNA Methodology are unreliable. It is irresponsible to approve the Methodology until the assumptions are aligned with the reality of COVID-19, remote work, changing transportation patterns, an exodus from California, and deepening economic upheaval.

3. RHNA Methodology that usurps local authority endowed to elected City Councils or Boards of Supervisors will not go unchallenged. Nor will community leaders, homeowners, and renters stand by as HCD foists irrational, wildly inflated housing quotas on communities. [CalMatters columnist Dan Walters](#), reporting about the Embarcadero Institute report writes, "resistance has developed among affected local governments and officials are mulling whether to challenge them in court."

**THERE IS A BETTER WAY!** Reject the unreliable RHNA Allocation Methodology. Take time to collaborate with locally elected officials and community leaders to get it right. With accuracy and collaboration, housing needs can be solved.

Sincerely,

***Lou Ann Bassan***



**From:** Pat Marriot <[REDACTED]>  
**Sent:** Wednesday, November 25, 2020 11:48 AM  
**To:** Regional Housing Need Allocation  
**Subject:** Please reject RHNA methodology

**\*External Email\***

Dear President Arreguin and ABAG Executive Board Members:

I urge you to reject the proposed RHNA Methodology until the accuracy of the housing numbers is confirmed, the assumptions are aligned with the reality of state (not national) trends in a post-COVID world, and the legality of the decision is determined.

1. Our housing need isn't as great as the state claims. We need numbers that are proven to be reliable before approving the Methodology.

Please refer to the Embarcadero Institute's report ["Double Counting in the Latest Housing Needs Assessment"](#) which says: *"Use of an incorrect vacancy rate and double counting, inspired by SB-828, caused the state's Department of Housing and Community Development to exaggerate by more than 900,000 the units needed in SoCal, the Bay Area and the Sacramento area."*

*"The state's approach to determining the housing need must be defensible and reproducible if cities are to be held accountable. Inaccuracies on this scale mark the fact that cities and counties are surpassing the state's market-rate housing targets but falling far short in meeting affordable housing targets."*

2. Methodology assumptions are unreliable. Methodology should not be approved they take into account the reality of COVID-19, working from home, changing transportation patterns, the exodus from California, and economic upheaval.

3. Methodology that takes away local authority of elected city councils will not go unchallenged. Community leaders, homeowners, and renters will not stand by as the HCD pushes wildly inflated housing quotas on them. [CalMatters columnist Dan Walters](#), reporting on the Embarcadero Institute report writes, *"resistance has developed among affected local governments and officials are mulling whether to challenge them in court."*

Please reject the unreliable RHNA Allocation Methodology. Take time to collaborate with locally-elected officials and community leaders and do the right thing.

Thank you,  
(Ms.) Pat Marriott [REDACTED]

[REDACTED]

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**From:** zrants <[REDACTED]>  
**Sent:** Wednesday, November 25, 2020 1:03 PM  
**To:** Regional Housing Need Allocation  
**Subject:** We support the Nix the Nine request that you dismiss the RHNA numbers

**\*External Email\***

November 25, 2020

Mayor Jesse Arreguin, President  
ABAG Executive Board  
c/o ABAG & MTC Public Information Office  
[RHNA@bayareametro.gov](mailto:RHNA@bayareametro.gov)

Dear President Arreguin and ABAG Executive Board Members:

**Summary:** Reject the proposed RHNA Methodology until the accuracy of the housing numbers is confirmed, the assumptions are aligned with the reality of state (not national) trends in a post-COVID world; and the legality of the decision is determined.

As an individual and neighborhood representative in San Francisco, I support the Nix the Nine request that you dismiss the RHNA numbers. We feel they are based on false assumptions and misrepresent the current housing needs of our communities. Count our neighbors among those who reject the RHNA numbers.

Sincerely,

Mari Eliza,

Concerned San Francisco Citizen and on behalf of Mission Street Neighbors.

November 24, 2020

Mayor Jesse Arreguin, President  
Executive Board, Association of Bay Area Governments  
375 Beale Street, Suite 700  
San Francisco, CA 94105

RE: Proposed RHNA Methodology and Subregional Shares - Support for **Option 8A** using the Plan Bay Area 2050 **Households** Baseline with the **Equity Adjustment**

Dear President Arreguin and ABAG Executive Board,

We are a diverse set of organizations and stakeholders, including the 6 Wins for Social Equity Network and close partners, from across the region focusing on housing, the environment, and the economy. **We strongly support ABAG's proposed RHNA methodology, known as the "High Opportunity Areas Emphasis & Job Proximity" methodology ("Option 8A") using the Plan Bay Area 2050 Households baseline, but believe the methodology needs to be further refined through a small but meaningful adjustment to more fully meet the statutory objective for affirmatively furthering fair housing.**

With the adjustment, this methodology will move us closer to an inclusive and prosperous region where all residents have a safe and affordable home and equal access to environmental, economic, and educational opportunity.

Option 8A represents a sound compromise born of an in-depth, iterative process at the ABAG Housing Methodology Committee. Over the last year, this diverse group of local elected officials, city and county staff, and community stakeholders engaged in robust discussion on every aspect of the methodology. ABAG adopted the Committee's recommendation due to its strong performance on the statutory objectives of RHNA. A majority of the Committee also supported an equity adjustment. We urge you to continue to respect the integrity of this process and move forward with the Committee's recommendation, with the equity adjustment.

**As ABAG staff has demonstrated through a set of performance metrics, Option 8A performs well on all five of RHNA's statutory objectives.** This methodology will help our region improve our environment, reduce our commutes, and ensure every resident has a stable home they can afford:

1. Improve our Environment: Option 8A will help improve our environmental health and mitigate climate change in several ways:
  - a. The “Access to High Opportunity Areas” factor allocates more homes in jurisdictions with high quality economic, educational, and *environmental* opportunity.<sup>1</sup> This means that more homes, especially affordable homes, will be allocated to jurisdictions with quality jobs, adequately-resourced schools, and minimal pollution.
  - b. The 70 percent weight to the “Access to High Opportunity Areas” factor for affordable homes will require jurisdictions that have mostly zoned for single-family homes to now zone for multi-family housing to meet the very low- and low-income allocations.<sup>2</sup> Multi-family buildings, such as apartments, are more efficient uses of our space and they use less energy, water, and land than single-family neighborhoods.<sup>3</sup>
  - c. The Plan Bay Area 2050 Households baseline and job proximity factors allocate more homes near projected job growth, thereby reducing commutes and greenhouse gas emissions. Option 8A with an Equity Adjustment allocates 60 percent of the total RHNA to the counties with highest projected job growth: San Francisco, San Mateo County, and Santa Clara County.
2. Reduce our Commutes: Option 8A will reduce commutes for *all kinds of jobs*, not just the tech jobs in Silicon Valley, in order to meet the new statutory jobs-housing fit requirement. Jobs-housing fit is a jurisdiction’s ratio of low-wage jobs to homes affordable to those workers.<sup>4</sup> Those workers include farmworkers, service workers at our tourist destinations, homes, offices, and schools, and many others. Currently, many of our jurisdictions have a severely imbalanced jobs-housing fit. For example, Pleasanton’s jobs-housing fit is 19 (meaning there are 19 low-wage jobs for every home affordable to those workers), Danville’s is 11, and Sonoma’s is 8. Each day, over 170,000 people commute into Contra Costa County for work and about one-third of those commuters are traveling more than 50 miles to those jobs, which means we need homes in Contra Costa County too.<sup>5</sup> Thus, Option 8A and the Equity Adjustment will help reduce commutes for everyone.

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<sup>1</sup> California Tax Credit Allocation Committee’s [Opportunity Mapping Methodology 2020](#); Environmental opportunity is based on [CalEnviro Screen 3.0](#), which measures the level of environmental health in each census tract, including the extent of air and water pollution.

<sup>2</sup> Cal. Gov. Code Section [65583.2\(c\)\(3\)\(B\)](#).

<sup>3</sup> “[Apartments in buildings with 5 or more units use less energy than other home types](#),” U.S. Energy Information Administration (June 2013).

<sup>4</sup> “[Low-wage Jobs-housing Fit](#): Identifying Locations of Affordable Housing Shortages,” UC Davis (Feb. 2016).

<sup>5</sup> U.S. Census Bureau, Center for Economic Studies at <https://onthemap.ces.census.gov/>.

3. Stable Homes for all Bay Area Residents: Residents across the Bay Area have a wide range of income levels but those on the lower end have few options affordable to them. Option 8A helps ensure that there will be new homes affordable in every part of the region. However, an Equity Adjustment, as described below, is necessary to fully meet this need.

**An Equity Adjustment is necessary to improve this methodology's performance on the affirmatively furthering fair housing objective.** At the Housing Methodology Committee's final meeting on September 18, more than half of the committee supported an adjustment to ensure that each exclusive jurisdiction receives a share of the region's very low and low-income allocations that is at least proportional to the jurisdiction's share of the region's total number of households.<sup>6</sup> Many members of the ABAG Executive Board also stated on October 15 that meeting the statutory objectives of RHNA and advancing racial equity were critical and worthy of potential improvements to the methodology.

The Equity Adjustment will operate as follows: if a racially and/or economically exclusive jurisdiction receives a share of the region's very low- and low-income allocations that is less than proportional to the jurisdiction's share of the region's households, the Equity Adjustment will add very low- and low-income units to its allocations until the jurisdiction's share of the region's very low- and low-income allocations is proportional to its share of the region's households. For example, if jurisdiction A is racially and/or economically exclusive and is home to 1% of the region's households but receives 0.8% of the region's very low- and low-income allocations, then the adjustment will add at least 0.2% of the region's very low- and low-income allocations to jurisdiction A.

Under the proposed methodology, without an adjustment, there are 17 exclusive jurisdictions that are *not* receiving this proportional share of very low- and low-income allocations.<sup>7</sup> Using an adjustment to re-allocate just 3,003 more affordable homes (which make up 1.7% of the total lower-income RHNA and 0.7% of the total RHNA) to these jurisdictions will ensure that this proportional threshold is met throughout the region. These allocations are essential to encourage more multi-family zoning, which will further both our need to build more affordably in areas of opportunity and build more efficiently and densely. Otherwise, the RHNA will exacerbate fair housing problems in over one-third of our historically exclusive jurisdictions which would be the opposite of affirmatively furthering fair housing.

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<sup>6</sup> Housing Methodology Committee [Meeting on Sept 18, 2020](#) at 1:06:00-1:06:47 (only 9 out of 31 members voted against the equity adjustment).

<sup>7</sup> Four out of those 17 jurisdictions are in Napa and Sonoma Counties where fire risk is increasing. Consistent with the duty to affirmatively further fair housing, ABAG should work with HCD and those 4 jurisdictions to discuss how these risks can be mitigated in their housing elements.

To apply the Equity Adjustment, the additional allocations must come from other jurisdictions. The following are a few different ways to perform this reallocation:

1. **Unincorporated jurisdictions:** The Equity Adjustment could take allocations from some unincorporated jurisdictions that may lack sewage and utility lines or have substantial protected open space. If ABAG chooses this option, it must carefully consider which unincorporated areas from which to reduce allocations, because there are many high-income, urbanized communities in unincorporated areas as well. For example, Alamo is an unincorporated community in Contra Costa County where the jobs-housing fit is 10, the median home value is \$1.6 million, and it is a high opportunity area.<sup>8</sup> Thus, this reallocation must still affirmatively further fair housing by ensuring that the unincorporated areas with high-income, urbanized communities are allocated their fair share of affordable units.
2. **Non-exclusive jurisdictions:** as staff had recommended to the Housing Methodology Committee on September 18, another option is to reduce allocations from all jurisdictions that are *not* “racially and economically exclusive” (as defined by the AFFH performance metric) in proportion to their initial share of the region’s lower-income RHNA.
3. **Least exclusive jurisdictions:** another option is to reduce allocations from the jurisdictions that have the *lowest* extent of racial and economic exclusion (as defined by the AFFH performance metric).

Moreover, **we strongly urge ABAG to reject alternatives, such as changing the baseline, that perform worse on the statutory objectives’ performance metrics.** Alternative proposals that use Plan Bay Area 2050 Growth as the baseline, for example, fail to meet the statutory objective to affirmatively further fair housing and perform worse than the current ABAG proposed methodology on almost all other metrics. If any further adjustments to the methodology are made, they should instead perform holistically better on the metrics and objectives.

**Finally, we recognize that there are many essential objectives of the RHNA process that must be advanced through local housing element updates, including equitable planning that accounts for geographies particularly vulnerable to fire and flood, protecting our open space, and dismantling segregation within local jurisdictions.** These are essential goals that local jurisdictions must address in their housing elements after they receive their RHNA allocations. State law allows local jurisdictions to plan how to meet their RHNA in ways that are most appropriate for their local context. For instance, they should avoid using sites with

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<sup>8</sup> UC Davis Jobs-Housing Fit [data](#) (2016); [Alamo Census Estimates](#) (2019); California Tax Credit Allocation Committee’s [Opportunity Map](#) (2020).



insufficient water, sewage, and dry utilities,<sup>9</sup> they should avoid planning for very low and low income homes in the neighborhoods facing moderate and high wildland fire hazards, and they should plan for more affordable homes in the neighborhoods with higher access to opportunity. We look forward to continuing to work with our elected leaders and agency staff across the region to ensure these goals are met.

Now is the time for all Bay Area cities and counties to come together and move collectively toward a more equitable, sustainable, inclusive future where people of all racial and economic backgrounds have access to housing and resources. ABAG's proposed methodology with the Equity Adjustment outlined above will help us get there.

Signed,

Shajuti Hossain, *Public Advocates*

Debra Ballinger, *Monument Impact (in Concord)*

Tim Frank, *Center for Sustainable Communities*

Louise Auerhahn, *Working Partnerships USA (in San Jose)*

Justine Marcus, *Enterprise Community Partners*

Leslie Gordon and Tameeka Bennett, *Urban Habitat*

Rodney Nickens Jr., *Non-Profit Housing Association of Northern California* [HMC member]

Jeffrey Levin, *East Bay Housing Organizations* [HMC member]

Darnell Grisby and Hayley Currier, *TransForm*

Mike Rawson, *Public Interest Law Project*

Matt King, *Sacred Heart Community Service (in San Jose)*

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<sup>9</sup> Cal. Gov. Code Section [65583.2](#)(b)(5)(B).

Laura Hall, *EAH Housing*

Héctor Malvido, *Ensuring Opportunity Campaign to End Poverty in Contra Costa County*

Ian Winters, *Northern California Community Land Trust*

Gina D. Dalma, *Silicon Valley Community Foundation*

Cindy Wu, *Bay Area Local Initiatives Support Corporation*

Leslye Corsiglia, *Silicon Valley at Home*

Adam Briones, *The Greenlining Institute*

Ruby Bolaria Shifrin, *Chan Zuckerberg Initiative* [HMC member]

Judith Bell, *The San Francisco Foundation*

Karen Chapple, *Professor of City & Regional Planning at UC Berkeley*

Jason Tarricone, *Community Legal Services of East Palo Alto*

Jennifer Ganata, *Communities for a Better Environment*

Nadia Aziz, *Law Foundation of Silicon Valley*

Belén Lopez-Grady and Sarah Casmith, *North Bay Organizing Project*

Aaron Eckhouse, *California YIMBY*

*East Bay for Everyone*

David Watson, *Mountain View YIMBY*

*South Bay YIMBY*

Kelsey Banes, *Peninsula for Everyone*

Laura Foote, *YIMBY Action*

Sylvia Chi, *Asian Pacific Environmental Network*

Todd David, *Bay Area Housing Advocacy Coalition*

Zarina Kiziloglu, *Pleasanton Housing Commissioner*





# Public Comments on Proposed RHNA Methodology

ABAG Executive Board  
December 17, 2020



# Approval of Proposed RHNA Methodology

- Housing Methodology Committee worked collaboratively from October 2019 to September 2020 to recommend a proposed methodology for allocating units throughout the Bay Area in an equitable manner
- **September 18:** HMC voted to recommend *Option 8A: High Opportunity Areas Emphasis & Job Proximity* with the 2050 Households baseline allocation as Proposed RHNA Methodology
- **October 1:** ABAG Regional Planning Committee voted to recommend Proposed RHNA Methodology for approval by ABAG Executive Board
- **October 15:** Executive Board approved Proposed RHNA Methodology and released for public comment
- **October 24 - November 27:** public comment period, including public hearing November 12

# Today's presentation

- Summary of written comments received during the public comment period about the Proposed RHNA Methodology, as well as oral comments from November 12 public hearing
- Public comment period also completed for Draft Subregional Shares - **no comment letters received**

# Public comment: number of letters received by respondent type

- During the public comment period, ABAG received **106 written comments** that provided perspectives from over 200 local government staff and elected officials, advocacy organizations, and members of the public, as some letters represented multiple signatories
- November 12 public hearing included **29 oral comments** from local government representatives, advocacy organizations, and members of the public

| Type of Respondent            | Number of Letters Received | Number of Oral Comments from Public Hearing |
|-------------------------------|----------------------------|---------------------------------------------|
| Public Agency - Alameda       | 5                          | 0                                           |
| Public Agency - Contra Costa  | 3                          | 0                                           |
| Public Agency - Marin         | 11                         | 1                                           |
| Public Agency - Napa          | 2                          | 0                                           |
| Public Agency - San Francisco | 0                          | 0                                           |
| Public Agency - San Mateo     | 11                         | 2                                           |
| Public Agency - Santa Clara   | 8                          | 2                                           |
| Public Agency - Solano        | 1                          | 0                                           |
| Public Agency - Sonoma        | 1                          | 0                                           |
| Advocacy Organizations        | 9                          | 8                                           |
| Members of the Public         | 57                         | 17                                          |

# Public comment: common themes

## Comment #1:

Jurisdiction is built out and/or lacks infrastructure to accommodate its allocation

## Preliminary ABAG Response:

- RHNA is required to increase housing supply and mix of housing types for all jurisdictions.
- Local information about plans, zoning, physical characteristics, etc. used as input into Plan Bay Area 2050 Blueprint, which is the baseline allocation in the Proposed RHNA Methodology.
- The Blueprint includes strategies to allow additional feasible growth within the urban footprint.
- By law, ABAG cannot limit RHNA based on existing zoning or land use restrictions, and must consider the potential for increased residential development under alternative zoning ordinances and land use restrictions.

# Public comment: common themes

## Comment #2:

The RHNA methodology should focus more on transit and jobs to better align with Plan Bay Area 2050 and the statutory RHNA objective to promote infill development and achieve greenhouse gas emissions reduction targets

## Preliminary ABAG Response:

- Plan Bay Area 2050 Blueprint is the baseline allocation in the Proposed RHNA Methodology.
- Blueprint emphasizes growth near job centers and near transit, resulting in improved jobs-housing balance and shorter commutes.
- Proposed RHNA Methodology adds factors that allocate nearly half of units based on job proximity (by both automobile and transit).
- Analysis shows Proposed RHNA Methodology performs well on all five RHNA statutory objectives (including greenhouse gas emissions reduction) and is consistent with Plan Bay Area 2050.
- Performance metrics show Proposed RHNA Methodology leads to higher growth rates in jurisdictions with most access to jobs and transit and those with lowest vehicle miles traveled per resident.



# Public comment: common themes

## Comment #3:

The RHNA methodology needs to directly incorporate hazard risk, Blueprint needs to better incorporate hazard data

## Preliminary ABAG Response:

- Including the Blueprint in the RHNA methodology addresses concerns about natural hazards, as the Blueprint excludes areas with unmitigated high hazard risk from Growth Geographies.
- The Blueprint strategies focus future growth away from the highest fire risk zones, support increased wildland management programs, and support residential building upgrades that reduce the likelihood for damage when fires occur in the wildland urban interface.
- The Blueprint strategies address the impacts of sea level rise. However, research does not provide guidance on how to model impacts of temporary riverine flooding.
- Communities can choose to take hazard risks into consideration with where and how they site future development.

# Public comment: common themes

## Comment #4:

Support for Proposed RHNA Methodology, particularly its importance for furthering regional equity

## Preliminary ABAG Response:

- Staff's analysis aligns with these comments and indicates the Proposed RHNA Methodology successfully furthers all five of the statutory objectives of RHNA, including requirements related to affirmatively furthering fair housing.

# Public comment: common themes

## Comment #5:

**Need to account for impacts from COVID-19, by delaying RHNA or reconsidering focus on proximity to jobs**

## Preliminary ABAG Response:

- Staff appreciates concerns about significant economic and societal impacts from COVID-19, and these concerns were relayed to the State in early summer.
- By law, ABAG must move forward with RHNA so jurisdictions can complete updates to their Housing Elements on time.
- Additionally, the 8-year RHNA cycle (which starts in 2023) represents a more long-term outlook than near-term impacts in 2020 and 2021.
- The potential impacts of the trend toward telecommuting in the longer term are incorporated into the Proposed RHNA Methodology through the Plan Bay Area 2050 Blueprint, which includes strategies to expand commute trip reduction programs through telecommuting and other sustainable modes.

# Public comment: common themes

## Comment #6:

Concerns about allocation to unincorporated areas

### Preliminary ABAG Response:

- Plan Bay Area 2050 Blueprint forecasts very little growth in unincorporated county areas, and it is focused inside urban growth boundaries.
- RHNA allocations to these areas are driven largely by the number of existing households in unincorporated county areas.
- ABAG-MTC staff has engaged in dialogue with local government staff in Santa Clara, Solano and Sonoma counties to explore potential ways to address these concerns.
- Housing Element Law also includes provisions that allow a county to transfer some of its RHNA allocation to a city later in the RHNA process.

# Public comment: common themes

## Comment #7:

Support for adding the “equity adjustment” proposed by some HMC members to the methodology

## Preliminary ABAG Response:

- Staff’s analysis indicates the proposed methodology currently achieves the statutory objective to affirmatively further fair housing.
- Proposed equity adjustment substantially increases the complexity of the methodology for minimal impact, shifting less than 2% of lower-income units.
- HMC chose not to move forward with the proposed equity adjustment in its recommended methodology.

# Public comment: common themes

## Comment #8:

Concern that HCD's RHND calculation was inaccurate and too high

## Preliminary ABAG Response:

- The procedures for calculating the RHND are clearly specified in state law and the grounds for an appeal were narrowly designed by the Legislature.
- ABAG staff have reviewed HCD's calculation methodology and believe it adheres to applicable legal requirements. The ABAG Executive Board ultimately decided not to appeal the RHND in June 2020.
- The window of appeal of the RHND is now closed. Further feedback on this element of the process is most appropriately provided to HCD, rather than ABAG.

# Public comment: common themes

## Comment #9:

**Jurisdiction-specific  
issues with Plan Bay  
Area 2050 Blueprint**

## Preliminary ABAG Response:

- Local jurisdiction staff had multiple opportunities to comment on the BASIS data used as the input for the Blueprint. ABAG-MTC staff has worked directly with local jurisdiction staff to address concerns.

# Next steps

- Staff will consider comments and recommend necessary adjustments for integration into Draft RHNA Methodology
- Draft RHNA Methodology scheduled for release in the next week
- **January 14, 2021:** ABAG Regional Planning Committee weighs in on Draft Methodology
- **January 21, 2021:** ABAG Executive Board slated to take action on Draft RHNA Methodology
- After a Draft RHNA Methodology adopted, ABAG will submit it to HCD for review
- Following in 2021: final methodology and draft allocations (spring), appeals process (summer), final RHNA allocation (late 2021)



# Thank You

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[abag.ca.gov/our-work/rhna-regional-housing-needs-allocation](https://abag.ca.gov/our-work/rhna-regional-housing-needs-allocation)