

From: [Eli Kaplan](#)
To: [Fred Castro](#)
Subject: FW: public comment to RHNA Methodology Committee and ABAG Executive Board
Date: Monday, December 14, 2020 5:25:13 PM
Attachments: [Sonoma"s RHNA debt.docx](#)

Hi Fred,

I just noticed this public comment submitted to the RHNA email yesterday. Can this be included in the public comment (email plus the attachment) for Thursday's Executive Board meeting? Thanks for your help!

Eli

From: Fred Allebach [REDACTED]
Sent: Sunday, December 13, 2020 3:30 PM
To: Regional Housing Need Allocation <rhna@bayareametro.gov>
Cc: David Rabbitt <david.rabbitt@sonoma-county.org>; Jane Riley <Jane.Riley@sonoma-county.org>; Tennis Wick <tennis.wick@sonoma-county.org>
Subject: public comment to RHNA Methodology Committee and ABAG Executive Board

External Email

Hello,

My name is Fred Allebach and I am a member of the Sonoma Valley Housing Group. I recently heard that the city of Sonoma and perhaps other ABAG cities were interested in counting excess 5th Cycle RHNA to the 6th Cycle. I also recently heard a possible city appeal of its current RHNA allocation of 330.

I'd like to point out that Sonoma has a RHNA deficit from 2000-2020 of 236 units from the very low, low and moderate categories and a surplus of 296 above moderate units. The attached data is from the ABAG RHNA website. This is hardly the kind of performance that furthers fair housing. I strongly suggest that the entire 2000-2020 Sonoma RHNA deficit be made up before any credit for Sonoma good behavior be given in any future RHNA cycles.

I'd also like to bring to your attention that the City of Sonoma held a Housing Our Community series in 2019 where the public recommended 735 new units over the next RHNA cycle with 52% being deed-restricted. There is plenty of public will here for more affordable housing.

I'm appalled that the City of Sonoma appears to not have the spine to lean into the kind and scale of housing needed to mitigate and address that it is the 18th most segregated city in the ABAG region.

https://belonging.berkeley.edu/most-segregated-and-integrated-cities-sf-bay-area?mc_cid=c604e3aa57&mc_eid=2e4bc583f0

I hope the RHNA Methodology Committee and the ABAG Executive Board will take my comments into account, and that you will consider shifting much of Sonoma County's unincorporated 6th Cycle RHNA allocation to County cities. Sonoma can take a 6th Cycle allocation of 500 at least, if not more. Low-density zoned, white suburbia has to be integrated; it's your job to hold feet to the fire.

best regards,
Fred Allebach



Fred Allebach
9/22/20

Analysis of Sonoma's RHNA Affordable Housing deficit.
from ABAG RHNA website data

There is a clear pattern in all the past RHNA progress reports from Sonoma, Sonoma County, and Bay Area, of way overbuilding market rate and way underbuilding, very low, low, and moderate income category housing. From 1999–2020, Sonoma has RHNA deficits of:
53 units for the very low category,
40 for the low category
143 for the moderate category,
and a surplus of 293 for the above moderate category.

Note, state Redevelopment money ended in 2012. RHNA staff confirmed that “permitted” is not equal to being built. The above deficits include the city's 48 SAHA units on Broadway.

1999-2006 Sonoma RHNA performance

very low: allocation 146/ permits issued 111, 76%; 24% underperformed by 35 units
low: allocation 90/ permits issued 68, 76%; 24% underperformed by 22 units
moderate: allocation 188, permits issued 66, 35%, 65% underperformed by 122 units
above moderate: allocation 260/ 587 permitted, 226%, 126% overperformed by 327 units
total allocation: 684
total permits issued: 832

2007-2014 City of Sonoma RHNA performance

very low: allocation 73/ permits issued 40, 55%; 45% underperformed by 33
low: allocation 55/ permits issued 32, 58%; 42% underperformed by 23
moderate: allocation 69, permits issued 29, 42%, 58% underperformed by 40
above moderate: allocation 156/ 84 permitted, 54%, 46% underperformed by 72
total allocation: 353
total permits issued: 185
RHNA performance avg: 52%

2015-23 RHNA city of Sonoma (75% of cycle)

very low, allocation 24, permitted 38, 158%, overperformed by 15
low, allocation 23, permitted 18, 78%, underperformed by 5
moderate 27, 46 permitted, 170%, overperformed by 19
above moderate, allocation 63, 101 permitted, 160% overperformed by 38
total allocation 137
deed-restricted 2, non-deed-restricted 37
total permitted 37
RHNA performance 27%



CITY of BELVEDERE

450 San Rafael Avenue ♦ Belvedere CA 94920-2336

Tel.: 415.435.3838 ♦ Fax: 415.435.0430

www.cityofbelvedere.org

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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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



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) 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



MAYOR STEVEN SCHARF
sscharf@cupertino.org

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November 25, 2020

ABAG Regional Planning Committee Members
Submitted Via Email To: 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
Fred Castro, Clerk of the Board, Association of Bay Area Governments,
fcastro@bayareametro.gov
rhna@TheCivicEdge.com

From: [Al Dugan](#)
To: [MTC-ABAG Info](#)
Subject: Re: Thank you for reaching out to MTC and ABAG
Date: Friday, November 27, 2020 10:44:44 AM

External Email

RHNA Novato

Novato Previous RHNA 415
Marin Previous total 2,298
Novato 18% of the Marin total

This RHNA 2,110
Marin total Marin 3,830
Novato 55% of Marin total

So the methodology is flawed for the original calculation which is heavily weighted by large areas to project the total Bay Area and then trying to allocate to anomalies like Marin County as an example. This is a mathematical exercise that has no connection to reality at the jurisdiction level.

To verify this statement, Novato of Marin County is a perfect example. 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 particularly critical for Novato. The city only receives 7.5% on the dollar of property tax revenue and is the poorest city for revenue per person in Marin county and is being assigned 55% of the housing.

Finally, local planning and Local General Plans are based on the reality of the jurisdiction, and take all of the factors into consideration. Overruling this detailed specific planning with the RHNA exercise in housing amounts and distribution that is driven by the excessively strong job growth in the South Bay. The RHNA numbers should go through a final review to match them up more closely to General Plans and planning based on actual conditions in the jurisdictions.

Al Dugan
Novato


Sent from my iPad

On Nov 25, 2020, at 7:42 PM, MTC-ABAG Info <info@bayareametro.gov> wrote:

Al Dugan:

Thank you for your recent correspondence to the Metropolitan Transportation Commission (MTC) or the Association of Bay Area Governments (ABAG). We appreciate your input; your comment will be reviewed by our team. MTC and ABAG are committed to public participation on key planning and investment decisions that come before our agencies.

Please visit [MTC's website](#) and [ABAG's website](#) to stay up-to-date on current activities. For a single public information resource for both agencies, visit [The Bay Link](#) — the joint blog of the Metropolitan Transportation Commission and the Association of Bay Area Governments.

Sincerely,
MTC-ABAG Public Information

Additional questions or comments?

Reply to this email

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Issue ID: 155

From: [John Futini](#)
To: [MTC-ABAG Info](#)
Subject: Re: Too many houses for Napa.
Date: Monday, November 23, 2020 4:26:28 PM

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.



City of Gilroy Mayor's Office

City Hall
7351 Rosanna Street
Gilroy, California
95020-6197

Marie Blankley, Mayor
marie.blankley@cityofgilroy.org
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Cell Phone (408) 465-6032
www.cityofgilroy.org

December 14, 2020

To: ABAG Executive Board Members
Submitted via email to: info@bayareametro.gov

From: City of Gilroy Mayor Marie Blankley

RE: December 17, 2020 Executive Board Meeting Agenda Item 9

Dear ABAG Executive Board Members,

On behalf of the City Council for the City of Gilroy, I would like to thank ABAG leadership and staff and the Housing Methodology Committee for your hard work and dedication over the past year on the proposed RHNA Methodology.

I understand that ABAG has received over 100 letters representing over 200 perspectives from local jurisdictions, nonprofit organizations, and the public. Many of these letters noted the importance of furthering regional equity as well as the need to focus RHNA on areas with transit and jobs to better align with Plan Bay Area 2050.

Gilroy is supportive of housing development in the City and continues to support efforts to provide Gilroy's fair share of the region's affordable housing needs. However, the City is adamantly opposed to a redistribution of housing units to the City of Gilroy from other jurisdictions that would be in conflict with the statutory objectives of RHNA and the Housing Methodology Committee's policy priorities regarding access to high opportunity areas and job proximity. ABAG convened the Housing Methodology Committee to guide development of the RHNA methodology, with representation across the nine (9) Bay Area counties.

Ultimately, the HMC recommended a methodology that allocates more housing units to jurisdictions with Access to High Opportunity Areas and Job Proximity. These factors were chosen to avoid further segregation and concentration of poverty and to encourage affordable housing in areas with access to job centers, good schools and low crime rates, among other factors. These policy priorities advance the five statutory objectives of RHNA and Objective 5 in particular; the new requirement to "affirmatively further fair housing," which focuses on overcoming patterns of segregation and fostering inclusive communities.

Furthermore, regional transportation options in Gilroy are limited, thus when looking at areas such as Access to High Opportunity Areas and Job Proximity, transportation options must also be part of that conversation.

In conclusion, Gilroy encourages ABAG's Executive Board to oppose any redistribution of housing units to the City of Gilroy from other jurisdictions, in conflict with these goals. Gilroy

appreciates the opportunity to be engaged in the conversation and the ongoing decisions to be made.

Sincerely,

A handwritten signature in blue ink that reads "Marie Blankley". The signature is fluid and cursive, with a long, sweeping tail on the "y".

Marie Blankley
Mayor, City of Gilroy

From: [Andrea Chelemengos](#)
To: [MTC-ABAG Info](#)
Cc: [smiller@cacities.org](#); [jrhine@cacities.org](#); [megan.kirkeby@HCD.ca.gov](#); [joe.harney@hcd.ca.gov](#); [Assemblymember.berman@assembly.ca.gov](#); [andi@citiesassociation.org](#); [City Council](#)
Subject: Public Comment on Proposed RHNA Methodology
Date: Wednesday, November 25, 2020 12:18:13 PM
Attachments: [abag_11-2020signed.pdf](#)

External Email

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.

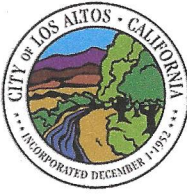
Like many cities, Los Altos has struggled to meet the much lower numbers that were assigned to us in the previous RHNA process. Assigning even higher numbers, that are completely unrealistic for our city to meet, serves no purpose. We are open and willing to work with ABAG staff to identify the areas 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



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Incorporated October 22, 1956

CITY OF SARATOGA

13777 FRUITVALE AVENUE • SARATOGA, CALIFORNIA 95070 • www.saratoga.ca.us

COUNCIL MEMBERS:

Mary-Lynne Bernald

Kookie Fitzsimmons

Rishi Kumar

Tina Walia

Yan Zhao

December 16, 2020

President Jesse Arreguin & ABAG Executive Board
Bay Area Metro Center
375 Beale Street
San Francisco, CA 94105

Subject: Regional Housing Needs Allocation (RHNA) Methodology

Dear President Arreguin & ABAG Executive Board Members,

Since as early as 1969, the State of California has recognized the need for cities, towns, and counties to plan for the future housing needs of residents across all income levels. Planning for and enabling future growth through the RHNA process and local Housing Element updates is one of many ways in which we have worked to address the housing crisis. While the City of Saratoga is eager to be a partner in this process, I would like to express concerns about the proposed RHNA Methodology.

In June 2020, the California Department of Housing and Community Development (HCD) released the housing needs allocation for the San Francisco Bay Area for the 2023 to 2032 time period. The total number of new housing units needed is estimated at 441,176. This compares to 187,990 for the prior planning period of 2015-2023 representing a 234% increase in future housing to be planned for in the Bay Area. The projected housing needs were developed well before we developed an understanding of the true impacts of the novel coronavirus (COVID-19) and it is becoming evident that this pandemic will cause a major shift throughout the Bay Area and in Santa Clara County. Major employers, such as Oracle and Hewlett-Packard, have responded by relocating their headquarters out of the region and state. Others, like Facebook and Twitter, have introduced new policies that allow employees to work remotely from any location for the foreseeable future. As a result, San Francisco apartment rental rates saw one of the steepest year-over-year declines. We are still grappling to identify the impacts of COVID-19 on our region and it would be prudent to postpone action on the RHNA Methodology until we clearly understand how COVID-19 will influence housing needs.

Under the proposed RHNA Methodology, the City of Saratoga would be expected to plan for 2,100 new housing units in the 2024-2032 Housing Element compared to 439 new units in the 2015-2023 Housing Element. Saratoga is a primarily residential community, with very limited commercial space or undeveloped lots. Less than 5% of the City is designated for commercial or office use. Planning for an additional 2,100 housing units will significantly reduce the already

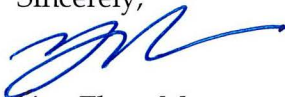
limited areas for commercial services and job opportunities, resulting in an increase in vehicle miles traveled as residents leave Saratoga to access grocery stores, common services, or get to work. Furthermore, there is very little access to public transportation in Saratoga. There are only a handful of bus lines that operate in the City of Saratoga with only one line that runs through Saratoga frequently (every 12 to 15 minutes on weekdays) with the other lines coming once every 30 to 60 minutes. This directly conflicts with the RHNA objective to encourage efficient development patterns and reduce greenhouse gas emissions.

Saratoga has been largely built out with a population of roughly 30,000 since the 1980s. The addition of more than 2,000 households to the City will have a marked impact on infrastructure and services. The RHNA Methodology fails to assess whether the infrastructure of a jurisdiction can accommodate the mandated growth. Furthermore, there has been no consideration of whether jurisdictions have the resources to meet future service burdens if RHNA targets are met. Additional households mean an overall increase in demand for various local services. With limited means for raising revenues, not all cities and counties may be able to fund infrastructure and services adequately.

In recent years, the State has adopted a slate of laws that assume the housing crisis can be solved simply by removing all imagined barriers to development. Many of these laws have penalized jurisdictions that have a track record of approving new housing projects but did not have enough private development applications to meet RHNA targets. This thinking has led to a drastic erosion of local control through laws like SB 35 that have done little to provide affordable housing to those who need it the most. These laws and penalties are an oversimplification of the housing crisis that completely fail to consider market influences on housing development. Roughly half the City is designated as part of the Wildland Urban Interface area. As a result, there are very few opportunities for economically feasible housing development. Without the appropriate financial incentives, the number of homes built in Saratoga and many other California communities will undoubtedly be lower than future housing needs anticipated in the RHNA process. While it is important that we plan for future growth, I hope our legislature will stop punishing communities if RHNA projections are out of sync with market demand and turn out to be wrong.

I believe that it is important to support affordable housing for the region, to build affordable housing in areas that have easy access to services and public transportation, and to align jobs and housing. However, I believe that the RHNA Methodology has seriously missed the mark if it aims to place more residential housing in areas that cannot sustain increased density due to lack jobs, transportation options, commercial services, and lack of available space or market interest for development.

Sincerely,



Yan Zhao, Mayor
City of Saratoga