



October 14, 2020

Jesse Arreguin, President, ABAG Board of Directors
Bay Area Metro Center
375 Beale Street, Suite 800
San Francisco, CA 94105

Re: Regional Housing Needs Allocation – Recommended Modification to Housing Methodology

Dear Director Arreguin:

I am writing on behalf of the Santa Clara Valley Open Space Authority (Authority) to express our concerns regarding the Regional Housing Needs Allocation (RHNA) housing methodology recommended by the ABAG Housing Methodology Committee – Option 8A.

First, to be very clear, the Authority is in full support of increasing housing allocations statewide to address the housing crisis (which is negatively impacting our communities in so many ways) including increasing housing allocations in urban Santa Clara County.

Our concerns are related to the significant acceleration of sprawl that is likely to result from the 1,300% increase in housing unit allocation to unincorporated areas of Santa Clara County (from 277 units in the previous update to 4,139 units now), and the negative impacts to human and natural communities which this sprawl would incur. Allocation of housing units in unincorporated areas, which are primarily rural, agricultural, or open space, will significantly increase pressure to zone for housing in areas at high risk for wildfire, over PCAs, on productive agricultural lands, or proximate to state and regionally-identified critical habitat linkages. Importantly, sprawl, and especially the increased greenhouse gas emissions associated with it, are directly in opposition to the intent of Plan Bay Area, and the climate fighting intent of SB 375 (Steinberg, 2009) on which it is based. Encouraging sprawl in rural areas of Santa Clara County would also be counter to the climate and natural infrastructure protection goals of SB 940 (Beall, 2020), AB 948 (Kalra, 2019), the State Sustainable Ag Land Conservation Program and the Santa Clara Valley Agricultural Plan which it funded, as well as Governor Newsom’s recent Executive Order on conserving 30% of the state’s lands and waters by 2030 as a critical strategy in reaching the state’s overall climate goals.

Housing allocations must be consistent with the intent to put a halt to greenfield development, while simultaneously supporting smart growth strategies that apply infill housing construction within the existing urban footprint of our communities where they best serve the population as well as the planet.

Andrea Mackenzie,
General Manager

Alex Kennett, District 1

Mike Flaughner, District 2

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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. Its Priority Conservation Area (PCA) program has created avenues to highlight and enhance regionally significant natural landscapes and habitats that surround the built environment and provide respite for the densifying PDAs. The vision set out by Plan Bay Area is one that seeks balance between growth in the built environment and the vital resources provided by our natural and working lands.

Further, with the latest megafires serving as a backdrop, the potential for wildland-fire-generated embers to be carried by winds for miles is well documented. Homes in and near the Wildland-Urban Interface, or WUI, are at particular risk if adequate defensible spaces, open space buffers and home hardening measures have not been taken. Increased, concentrated development in the WUI, incentivized by the pressure of high RHNA allocations, may increase this risk even further. A 2017 insurance analysis shows that almost 350,000 homes in the Bay Area are in areas at high or extreme risk of wildfire.

For all of the reasons stated, we recommend that the housing methodology considered for adoption by the ABAG Executive Board be modified so that it is consistent with climate goals and strategies within Plan Bay Area, and with climate goals of our local jurisdictions 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,

A handwritten signature in blue ink that reads "Andrea Mackenzie". The signature is fluid and cursive, with a long, sweeping tail on the final letter.

Andrea Mackenzie

General Manager, Santa Clara Valley Open Space Authority