

SUSAN CANDELL

October 14, 2020

Re: Item 7a Recommendation for Regional Housing Needs Allocation (RHNA) Proposed Methodology

Dear ABAG Executive Board,

I am the Vice Mayor of the City of Lafayette but am responding as a private resident.

The City of Lafayette signed a letter along with the Mayor's Conference of Contra Costa County opposing the Option 8A which places housing far from jobs and does not consider climate change which is counter to your prior goals. I agree with this opposition and feel that housing still should be close to jobs, but that is not the intent of this letter.

Instead, I would like to address the total housing allotments from HCD for the Bay Area. I had the pleasure of listening to Gab Layton's review from the Embarcadero Institute<sup>1</sup> (attached) showing how HCD over-counted allotments by 900,000 units in our state. This was due to both a double-count and an inaccurate vacancy rate for homes in our state. But these errors resulted in a huge difference between what our last housing cycle would have considered as true projections and now this cycle's projections. She merely ran their own analysis with the correct numbers with vastly different results.

In addition, in Freddie Mac's assessment<sup>2</sup> (attached) for California, they estimated that California only needs 820,000 units, not the mythical 3.5 million contained in our current projections.

32 cities in Orange County wrote a letter (attached) to SCAG to oppose their allocations based on these two reports. They are asking to assess HCD's allocation to the SCAG region, and include the Bay Area also needs to be re-examined.

Both analyses show inaccuracies in the projections, and both were PRE-COVID. ABAG and MTC have not successfully provided any strategy for dealing with the Bay Area in a post-COVID world, which is quickly becoming our reality. This should be a CORE objective for regional planners, and we should be setting up working groups to acquire our own data in terms of jobs, housing, traffic, public transportation ridership and population. We as a region need to learn to fight today's battles, not yesterdays.

I urge you to re-assess the allocations based on this new and credible data.

With appreciation,

Susan Candell  
Vice Mayor, City of Lafayette

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<sup>1</sup> <https://embarcaderoinstitute.com/portfolio-items/double-counting-in-the-latest-housing-needs-assessment/>

<sup>2</sup> <http://www.freddiemac.com/fmac-resources/research/pdf/202002-Insight-12.pdf>

