



Silicon Valley

October 14, 2020

Executive Board
Association of Bay Area Governments
375 Beale St.
San Francisco, CA 94105

Re: Proposed 2023-2031 RHNA Methodology

Dear President Arreguin, Vice President Ramos, and members of the Executive Board,

This represents the comments of the Sierra Club Loma Prieta Chapter, Mothers Out Front Silicon Valley, Green Foothills, Santa Clara Valley Audubon Society, and CLEAN South Bay with regard to Option 8A, the RHNA methodology recommended by the Housing Methodology Committee to the Executive Board.

We are environmental organizations that represent tens of thousands of members in Santa Clara County. We advocate at the local level for open space, wildlife habitat, and responsible land use planning. We have serious concerns with the impacts of Option 8A on climate change resilience, wildfire risk, open space, wildlife habitat, and greenhouse gas emissions reduction. Please take action to address these very serious concerns before voting on the RHNA methodology.

Option 8A Will Result In Sprawl Development

As organizations that work to protect open space, we have spent decades fighting against unwise sprawl development proposals. Never did we think to see ABAG recommending a methodology that would literally mandate sprawl development into our open space and natural and working lands.

In Santa Clara County, Option 8A allocates 4,137 residential units in the unincorporated area -- a 1,300% increase from the previous RHNA allocation, which was 277 units. Because one of the foundational principles of the Santa Clara County General Plan is that urban-scale growth should occur within urban areas, and that the unincorporated areas should remain undeveloped

as much as possible, this means that Option 8A is mandating sprawl development into rural agricultural and habitat areas.

Plan Bay Area's goals since inception have always been focusing growth in infill areas close to transit through Priority Development Areas (PDAs), while protecting important open space through Priority Conservation Areas (PCAs). Option 8A would turn this on its head by requiring a 1,300% increase in housing allocation for Santa Clara County's rural areas. By contrast, the increase in allocation for the cities in Santa Clara County ranges between 100% and 500% (for example, San Jose's allocation increases by 98%, and Cupertino's allocation increases by 498%). Again, this is the exact opposite of smart land use planning, as well as flying in the face of Plan Bay Area's guiding principles.

Governor Newsom, when announcing his recent Executive Order calling for conservation of 30% of the state's lands and waters by 2030, stated: "California's beautiful natural and working lands are an important tool to help slow and avert catastrophic climate change, and today's executive order provides important new tools to take on this existential threat." Option 8A runs directly counter to this vision.

Option 8A Will Be Harmful To Wildlife, Floodplains and Farmland

The allocation of 4,137 residential units to unincorporated Santa Clara County creates particular risk for Coyote Valley, a critical wildlife corridor and landscape linkage that has been identified by the Conservation Lands Network and the Santa Clara Valley Open Space Authority as a priority for conservation. Coyote Valley is the link that connects 1.13 million acres of core habitat in the Santa Cruz Mountains and the Diablo Range, forming a migratory pathway for mountain lions, coyotes, bobcats, badgers and other wildlife. Coyote Valley hosts 12 species of rare, threatened and endangered plants and animals. Coyote Valley is also an important floodplain and groundwater recharge area and contains some of the Santa Clara Valley's last prime farmland.

Coyote Valley has been the focus of several state-level efforts for conservation. In 2019, AB 948 (Kalra) recognized Coyote Valley as a natural resource of statewide importance, and in 2020, SB 940 (Beall) made it possible for San Jose to expedite changes for infill housing development while proactively protecting open space, including in Coyote Valley.

Due to its proximity to the urbanized areas of San Jose and Morgan Hill, Coyote Valley has always been threatened with development, ever since the days when the inevitability of sprawl into open space was taken for granted. Now, however, thanks to our new awareness of the importance of preserving open space for climate resilience and human health, Coyote Valley is finally on a path to being permanently protected. But the allocation of 4,137 residential units to unincorporated Santa Clara County will create new and unforeseen development pressure on Coyote Valley. It is critical for the survival of this "last chance landscape" that the RHNA methodology be revised to remove this target that Option 8A paints on the open space of Coyote Valley.

Option 8A Will Increase Wildfire Risk

Option 8A's allocations will place thousands of residents in the wildland-urban interface (WUI), the area where urbanized neighborhoods intersect with undeveloped lands. Only a few weeks ago, the SCU Complex Fire raged over nearly 400,000 acres in unincorporated Santa Clara County and neighboring counties, prompting evacuations even in densely populated neighborhoods in San Jose and Morgan Hill. If we have learned anything at all from this wildfire season, it's that we cannot allow residential development to sprawl outward from cities into the WUI. Yet that is exactly what Option 8A would require.

We respectfully request that the ABAG Executive Board take action to modify the RHNA methodology to eliminate these harmful impacts to climate change resilience, wildlife habitat, wildfire risk, and natural and working lands. Thank you for your consideration of these comments.

Sincerely,

Alice Kaufman, Legislative Advocacy Director
Green Foothills

Shani Kleinhaus, Environmental Advocate
Santa Clara Valley Audubon Society

Dave Poeschel, Open Space Committee Chair
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