Dear ABAG Executive Board Members,

As a diverse, cross-sector coalition of Bay Area organizations, we urge the ABAG Executive Board to uphold the work of the Regional Housing Needs Allocation (RHNA) Housing Methodology Committee you empowered and to adopt their proposed methodology: the "High Opportunity Areas Emphasis & Job Proximity" methodology, known as "Option 8A," using the Plan Bay Area 2050 Households projection as its baseline. We believe this methodology and its baseline represent a sound compromise born of a sound process, and will meaningfully advance more equitable and sustainable regional development patterns for the region.

ABAG convened the Housing Methodology Committee -- a diverse set of local elected officials, city and county staff, and community stakeholders from all over the region -- to dive deep into the technical details and make a holistic, balanced, and equitable recommendation for the RHNA methodology. Over the course of a year, this diverse group engaged in robust discussion over every aspect of the RHNA methodology. The proposed methodology they produced is the result of this deep engagement, as well as input from members of the public, housing advocates, and elected officials from around the region. Consensus and compromise were the order of the day, and the result was a methodology that almost every member of the HMC was able to support.

The methodology proposed by the HMC is not perfect. Any one of our groups could find ways to adjust and improve it if we were given sole discretion to do so. Many of us preferred other options during the HMC process. However,it is a strong compromise that prioritizes the needs of the region as a whole, as the HMC and ABAG are charged to do. The HMC's proposed methodology effectively advances all of the statutory objectives for RHNA, including increasing access to jobs and opportunity for everyone in the region.

The alternate methodologies put forward, specifically those that use the Plan Bay Area 2050 Growth Projection as the baseline, significantly reduce access to opportunity and undermine RHNA's statutory objective to affirmatively further fair housing. Those shortcomings are clear from the data: these proposals perform poorly on the RHNA evaluative metrics, specifically those developed to measure affirmatively furthering fair housing. This puts the region at risk of not adequately meeting statutory obligations and potential response from the State or fair housing advocates. This alternative baseline was carefully considered by the HMC's diverse membership, and rejected for not being the best choice to advance all statutory objectives and the needs of the region as a whole. If any further adjustment to the methodology is to be made, it should be instead to improve performance on the evaluative metrics.

We urge ABAG to uphold the HMC's work and adopt their proposed draft methodology as the starting point for ongoing public comment and feedback. It is the most carefully considered and analyzed choice available, and the one that would best meet all of RHNA's statutory objectives, as well as best balancing the interests of all residents of the Bay Area.

Respectfully,

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California YIMBY

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