From:	Aaron Eckhouse
To:	Regional Housing Need Allocation; MTC Info
Subject:	Re: ABAG Housing Methodology Committee (5/14 meeting)
Date:	Tuesday, May 12, 2020 1:10:22 PM
Attachments:	YIMBY RHNA Letter.pdf

Please find attached comments from a coalition of regional pro-housing organizations on the allocation methodology for RHNA. We commend the Committee for the work they have done so far & hope these comments are helpful to their important work.

thank you,

Aaron Eckhouse
Bay Area Regional Organizer, California YIMBY
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he/him/his

May 12, 2020

Chairman Arreguin and esteemed members of the Housing Methodology Committee,

The 6th Cycle Regional Housing Needs Allocation (RHNA) process is a tremendous opportunity to address the pressing social, economic, and ecological need for more homes of all kinds in the Bay Area. It provides a chance to undo historic patterns of segregation and exclusion, expand access to economic opportunity, and establish more sustainable development patterns that will help the Bay Area be a global climate leader. To that end, we offer the following suggestions to the Housing Methodology Committee on how to best allocate the Bay Area's housing need across jurisdictions.

Locating new housing in and near high opportunity areas should be a top factor in considering the share of total housing need allocated to each jurisdiction. Using fair housing metrics for total housing need will most effectively advance the mandate to affirmatively further fair housing and promote the greatest expansion of housing opportunities in resource-rich communities, many of

which have an unfortunate legacy of exclusion that must be overcome. Promoting greater housing opportunities in these neighborhoods is a proven way to help advance regional priorities such as economic mobility, as well as being the metric most clearly consistent with the statutory requirement to affirmatively further fair housing. It is crucial for this metric to be used throughout the allocation process, rather than only to allocate the low-income share of housing need, to ensure that more housing of all types is built where it is needed most. In this way, allocation based on access to high opportunity areas can also advance the statutory requirement to increase housing supply & mix of housing type across all jurisdictions in an equitable manner.

Proximity to jobs should be the other highest-weighted metric in allocation, advancing both the statutory requirement to promote improved regional jobs-housing balance and the requirement to promote infill development and efficient development patterns. It is critical to our climate goals that we give people more opportunities to live closer to work, shortening commutes and making it easier for them to choose non-car modes of transportation. Jobs proximity is a preferred metric because it recognizes that people care less about jurisdictional lines than they do about the chance for a shorter, more convenient commute. This metric, combined with the high opportunity metric, will have the added benefit of allocating the most new housing to the areas in which high demand makes those homes most likely to actually be built.

The "natural hazard" metric does not appear to be effective, as currently constituted, at avoiding development in high risk areas. In fact, it would have the effect of shifting more growth toward areas in the North Bay, such as Windsor and unincorporated Santa Rosa County, that have seen some of the most prominent and destructive natural disasters of recent years. There are very few if any Bay Area cities that truly lack enough safely buildable land to accommodate their share of the housing growth we need as a region. The best way to protect against natural hazards such as fire is to promote compact infill growth in the Bay Area's jobs-rich core.

In addition to weighting factors, we also need a robust evaluative framework for analyzing the eventual allocation methodology. This framework should include consideration of how well the allocation affirmatively furthers fair housing and supports a reversal of historic patterns of segregation and exclusion; how well the proposed housing growth pattern supports a reduction of greenhouse gas emissions and vehicle miles traveled in both commutes and non-work trips; opportunities for transit oriented development along both current and potential future quality transit corridors; and whether the proposed allocation is consistent with patterns of housing demand that shape where new homes are most likely to actually be built.

At the core of the Bay Area's housing crisis is a failure by cities across the region to permit adequate housing for its residents at all levels of affordability. Previous RHNA cycles have unfortunately contributed to this failure, through inadequate overall goals and an inequitable distribution of new homes that concentrated most housing in a few locations. In recent years, the state responded to these shortcomings by passing several laws to reform the RHNA process. The current RHNA cycle is an opportunity to correct those inequities and ensure that

all Bay Area cities permit abundant and affordable housing near jobs, transit, and other key community resources. We hope our suggestions will help the Housing Methodology Committee make the most of it.

With thanks to the Committee for their consideration,

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The 1500 Members of
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