

SUSTAINABLE TAMALMONTE

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November 18, 2020

Mayor Jesse Arreguin, President
Association of Bay Area Governments (ABAG) Executive Board
c/o ABAG & MTC Public Information Office
375 Beale Street, Suite 800
San Francisco, CA 94105
RHNA@bayareametro.gov

Re: Proposed RHNA Methodology

Dear President Arreguin and ABAG Executive Board Members,

Sustainable TamAlmonte submits the following comments on the proposed Regional Housing Need Allocation (RHNA) methodology, **Option 8A**, recommended by the ABAG Housing Methodology Committee. We respectfully request that you reject **Option 8A** and instead approve an Alternative RHNA Allocation Methodology Option. A revision to the allocation methodology is necessary to meet RHNA statutory objectives and for the Regional Housing Need Allocations to be consistent with the Plan Bay Area 2050 Blueprint.

I. PROBLEMS WITH THE OPTION 8A RHNA ALLOCATION METHODOLOGY

The **Option 8A** RHNA Allocation Methodology fails to fulfill the following RHNA statutory objectives and Plan Bay Area 2050 Draft Blueprint purpose, guiding principle, objectives, strategies, and policy:

- The Second Statutory Objective for RHNA is; “Promoting infill development and socioeconomic equity, **the protection of environmental and agricultural resources**, the encouragement of efficient development patterns, and **the achievement of the region’s greenhouse gas reductions targets provided by the State Air Resources Board** pursuant to Section 65080.”¹
- The Sixth Statutory Objective for RHNA, pending state legislation, is; “**Reducing development pressure within very high fire risk areas.**”²

¹ https://rhna-factors.mtcanalytics.org/data/RHNA_Statutory_Objectives.pdf

² https://rhna-factors.mtcanalytics.org/data/RHNA_Statutory_Objectives.pdf

- As mandated by Senate Bill 375, the main purpose of the Plan Bay Area 2050 Draft Blueprint, the Bay Area’s Sustainable Communities Strategy, is to **lower Green House Gas (GHG) emissions from cars and light trucks** while accommodating all needed housing growth within the region.
- Plan Bay Area 2050 Draft Blueprint’s Guiding Principle entitled “Healthy” states; **“The region’s natural resources, open space, clean water, and clean air are conserved – the region actively reduces its environmental footprint and protects residents from environmental impacts.”**³
- Plan Bay Area 2050 Draft Blueprint’s Strategy #8 states; **“Reduce Risks from Hazards.** Adapt the vast majority of the Bay Area’s shoreline to sea level to protect existing communities and infrastructure, while providing means-based financial support to retrofit aging homes.”⁴ Until communities and infrastructure are actually protected from sea level rise, areas subject to sea level rise should not be further developed.
- Plan Bay Area 2050 Draft Blueprint’s Strategy #9 states; **“Reduce Environmental Impacts.** Maintain the region’s existing urban growth boundaries through 2050, while simultaneously partnering with public and non-profit entities to protect high-value conservation lands. **Further expand the Climate Initiatives Program to drive down greenhouse gas emissions.”**⁵
- The Plan Bay Area 2050 Draft Blueprint states that **Areas Outside Urban Growth Boundaries (including Priority Conservation Areas – PCAs) and Unmitigated High Hazard Areas should be protected.**⁶ As such, growth should not be targeted in such areas.
- In addition, the Housing Opportunity Areas are supposed to be areas with high quality public schools, proximity to well-paying jobs, a high-income population, and a **clean and safe environment.** ⁷

Contrary to the above RHNA and Plan Bay Area 2050 objectives, the Option 8A RHNA Allocation Methodology will not further Green House Gas reduction goals or protect residents from hazardous environmental impacts. Option 8A allocates too many housing units to suburban areas that are far from job centers, lack adequate public transit, and are subject to perilous hazards. Especially worrisome is the fact that the methodology increases development in high fire hazard zones with unsafe evacuation routes, and in areas subject to lack of water supply, sea level rise, and flooding.

³ https://www.planbayarea.org/sites/default/files/PBA2050_GP_Res.4393_Table.pdf

⁴ https://www.planbayarea.org/sites/default/files/5b_PBA50_DraftBlueprint_StrategiesAction.pdf

⁵ https://www.planbayarea.org/sites/default/files/5b_PBA50_DraftBlueprint_StrategiesAction.pdf

⁶ Mayor Pro Tem Pat Eklund. “Report on ABAG to MCCMC”. September, 2020

⁷ <https://www.treasurer.ca.gov/ctcac/opportunity/2020-tcac-hcd-methodology.pdf>

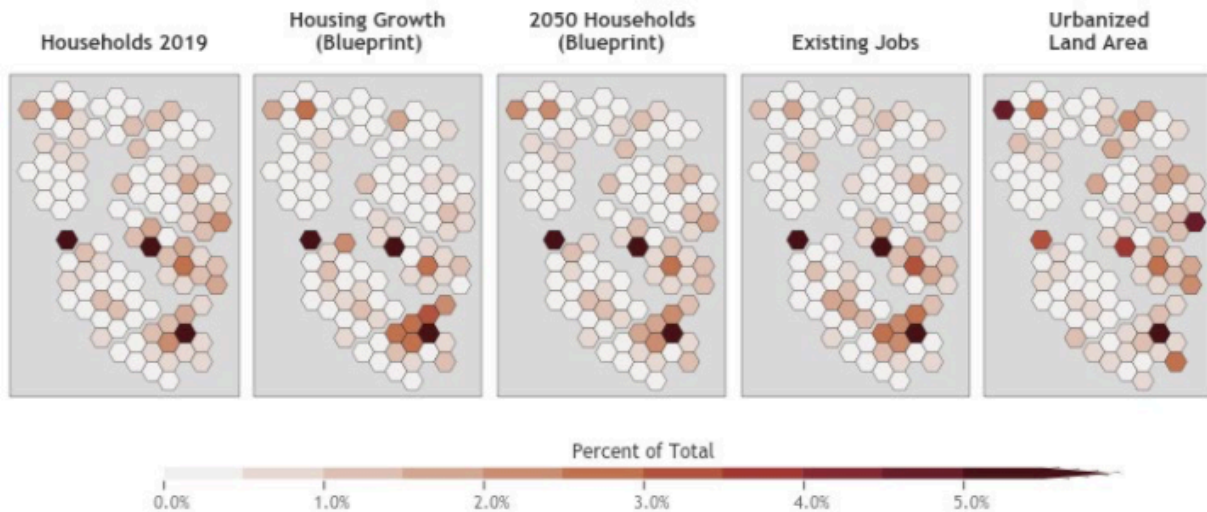
II. RECOMMENDED ALTERNATIVE RHNA ALLOCATION METHODOLOGY OPTION

In order for the Regional Housing Need Allocations to meet RHNA Statutory Objectives and be consistent with Plan Bay Area, we recommend you approve an Alternative RHNA Allocation Methodology Option with the following features:

1. Use the baseline allocation recommended by the Contra Costa County Mayors Conference entitled; “Future Housing Growth 2015-2050 (Draft Blueprint)” AKA “Housing Growth (Blueprint)”:

The new Alternative RHNA Allocation Methodology Option should use the baseline allocation recommended by the Contra Costa County Mayors Conference entitled; “Future Housing Growth 2015-2050 (Draft Blueprint)” AKA “Housing Growth (Blueprint)” in **Figure 1** (below). This alternative baseline allocation is based on each jurisdiction’s share of Bay Area household future growth through 2050 and is better aligned with the growth pattern in the Plan Bay Area 2050 Draft Blueprint. Emphasis on future employment development patterns leads to RHNA allocations being more focused in Silicon Valley, the region’s largest job center. Moreover, this approach was suggested by ABAG Staff in July 2020 and is consistent with how long-range forecasts have been used in ABAG’s methodologies for previous RHNA cycles.

Figure 1: Jurisdiction Share of Regional Total for Baseline Allocation Options



2. The new RHNA Allocation Methodology Option should target growth near employment and high-quality public transit:

Option 8A targets growth in areas far from employment and/or areas with non-existent or poor-quality public transit, in which bus routes have average service intervals during peak traffic hours that are as long as 30 minutes. Few, if any, residents would use public transit that is so inconvenient. Instead, include a metric in the RHNA Allocation Methodology that targets growth near employment centers and in “Transit Rich Areas”. Transit Rich Areas should be areas near a “major transit stop”, such as a rail transit station or ferry terminal, or a “high-quality bus

corridor”, which is a fixed bus route service with average service intervals of 15 minutes or else 10 minutes or less during peak traffic hours.

3. The new RHNA Allocation Methodology Option should preclude development in areas subject to hazards, particularly areas subject to lack of water supplies, sea level rise & flooding, and high fire risk:

Only Option 8A’s baseline allocation, which is consistent with the Plan Bay Area 2050 Draft Blueprint, protects households from hazards. Many of Option 8A’s other metrics, including the “High Opportunity Areas Map”, target household growth in hazardous areas, which would greatly endanger residents. This should be rectified.

When trying to improve housing equity and further fair housing, it is unconscionable to expose vulnerable senior and lower income households to high hazard risks, when they have the least resources available to cope with the adversity caused by such hazards.

A new alternative RHNA Allocation Methodology Option should preclude development in areas subject to hazards, particularly areas subject to lack of water supplies, sea level rise & flooding, and areas within the Wildlands Urban Interface with unsafe evacuation routes. This includes Very High Fire Hazard Zones and High Fire Hazard Zones. Evacuation routes in “High Fire Hazard Zones” are typically just as perilous as “Very High Hazard Zones”.

In addition, please ensure that the RHNA allocation methodology and Plan Bay Area 2050 Draft Blueprint use Wildland Urban Interface (WUI) maps to identify high fire risk areas. These maps are available at local Fire Districts and in the Metropolitan Transportation Commission Map Gallery.

We understand that, currently, only CAL FIRE High Fire Hazard Severity Zones are factored into the RHNA methodology and Plan Bay Area. Many high fire risk areas, which are in Local Responsibility Areas and not State Responsibility Areas, have not been evaluated by CAL FIRE, and therefore have not been given a “Severity” designation (a term only used by CAL FIRE) and are not identified on CAL FIRE maps.

Below is a link to the CAL FIRE map entitled: "DRAFT Fire Hazard Severity Zones in Local Responsibility Areas". You will see that in the Local Responsibility map there are gray areas entitled; “Local Responsibility Area Un-zoned – (LRA Un-zoned)” - meaning CalFire has not yet evaluated these areas.

Link to “DRAFT Fire Hazard Severity Zones in Local Responsibility Areas” Map:
https://osfm.fire.ca.gov/media/6706/fhszl06_1_map21.pdf

III. CONCLUSION

We respectfully request that you reject the **Option 8A** RHNA Allocation Methodology and instead approve an Alternative Allocation Methodology Option with the above recommended features. In doing so, you will correct the flaws of Option 8A and provide a RHNA Allocation Methodology that meets RHNA statutory objectives and is consistent with the Plan Bay Area 2050 Draft Blueprint.

Thank you in advance for your conscientious consideration.

Very truly yours,

/s/

Sharon Rushton, Chair
Sustainable TamAlmonte