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November 16, 2020

Hon. Jesse Arreguin
ABAG Executive Board
Bay Area Metro
375 Beale Street
San Francisco, CA 94105

VIA EMAIL

RE: Public Comment on Proposed RHNA Methodology

Dear Board President Arreguin and Members of the Executive Board:

On behalf of the Cities Association of Santa Clara County, we would like to thank ABAG's leadership and staff for all of your hard work and dedication over the course of the past year through the Housing Methodology Committee (HMC) process. The Cities Association supports a Regional Housing Needs Assessment (RHNA) methodology that:

- Advances the RHNA statutory objectives
- Allows for an equitable distribution throughout the region
- Preserves open space
- Performs well in reducing GHG emissions
- Allows for consistency between RHNA and Plan Bay Area 2050
- Is a strong methodology to submit to the HCD for approval.

The Cities Association, however, objects to a methodology that allocates the largest share to Santa Clara County again. Santa Clara County is also one of only 3 jurisdictions where its share of the RHNA allocation would exceed its share of Bay Area Households. As we have shared before, we believe the RHNA process should be delayed until the State has a better understanding of the impact of COVID, including but not limited to the impact on job and household growth based on the increase in the number of employers allowing employees to telecommute. Additionally, the Cities Association has serious concerns that a significant portion of the underlying data used in Plan Bay Area 2050 is inaccurate, incomplete and/or outdated.

Similar to other counties in the region and statewide, our residents and elected officials are questioning where and how they will be able to build these large shares of allocated units, especially when we already struggled the last 8 years to meet much lower numbers. The solution is not increasing the RHNA numbers; instead, our leaders should first identify the barriers to building more housing and help local communities tackle those barriers.

Finally, we understand that the total number of units for the nine Bay Area region was determined by the California Department of Housing and Community Development (HCD). Therefore,

we strongly urge ABAG to join us in advocating against moving forward with the RHNA process at this time. Proceeding now will only set local communities up to fail and still not help to solve the problem. Instead, we recommend that the HCD, ABAG and the other regional groups form a committee to develop real solutions to California's housing crisis, and we are ready to partner with you on such an effort. Thank you again for all your work this year.

Thank you for your consideration.

Sincerely,



Larry Klein
President, Cities Association
Mayor, City of Sunnyvale



Neysa Fligor
Chair, Legislative Action Committee
Vice-Mayor, City of Los Altos

cc: Senator Wieckowski
Senators-Elect Becker, Cortese, Laird
Assembly Members Rivas, Kalra, Chu, Berman, Low, Stone
Assembly Member-Elect Lee
Gustavo Velasquez, Director, California Department of Housing & Community Development
Keely Martin Bosler, Director, California Department of Finance
Therese McMillan, Executive Director, ABAG & MTC