

Proposed RHNA Methodology and Subregional Shares

Patti Fry

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To: Regional Housing Need Allocation <rhna@bayareametro.gov>

External Email

To whom it may concern:

I admire the intent to balance better the jobs and housing in our communities as well as to support more opportunities and equity. However, I have major concerns about the RHNA (and Plan Bay Area) methodology and allocations, particularly in this unprecedented time:

1. ABSENCE OF CONSIDERATION OF COVID-19'S LONG-LASTING IMPACTS ON WORK - The housing needs appear to be based on estimated employment based on history rather than to take into consideration any of the likely lasting effects of COVID. Since it is highly likely that employment practices - particularly regarding remote work - will be changed forever, these will greatly alter commute patterns and the locations where housing is needed. Major employers have already stated this. The pandemic has proven that employees and contractors are able to work far from the bay area, even out of state, and many will not need bay area housing. Thus, commute patterns and locations where housing will be needed will be greatly altered.

The methodology and the allocations need to take COVID'S long-term employment impacts into account, at a minimum as a revision within two years to the methodology and allocations.

2. INADEQUATE CONSIDERATION OF INFRASTRUCTURE - The allocation method for most new housing does not seem to take into account where major transit hubs are or will be. There is no consideration of available transit for moderate and above housing, seemingly assuming that nearly all new residents will be reliant on vehicles. That can make it difficult for cities to meet climate change goals as well as difficult to support transit with new commuters who will need to rely on autos instead.

It also ignores schools' capacity, water availability, access to groceries and services, and other infrastructure to support new housing and residents. Top-down allocations ignore these practical issues that cities may not be able to solve without regional or state support that has been missing. For example, cities are virtually powerless to improve transit whereas ABAG/MTC is in the driver's seat but not providing solutions.

The methodology should take infrastructure much more into account.

3. TOP-DOWN ALLOCATIONS AT CITY LEVEL - Cities considered High Resource Areas, oddly whether jobs-rich or more wealthy - may be located adjacent to cities considered to be of lower incomes and "housing rich", but the allocations do not consider this. For example, in southern San Mateo County, such cities not only share boundaries, they cross county lines.

Improved access to opportunity cannot be solved solely by housing policy. It is a factor, but cannot take the place of improved educational and employment opportunities that are not solvable at a single-city level.

ABAG/MTC should allow, promote, and support (i.e., fund) sub-regional cooperation and planning to better level-out housing demand and supply while also addressing other issues related to opportunity and equity.

4. **JOBS-HOUSING RATIO** - There is a housing shortage because jobs have been increasing faster than the supply of sufficient housing in which the new workers will live. The PBA and ABAG methodologies address only the housing supply, not the driver of demand. This is a flaw that should be acknowledged and remedied.

Both Land Use Elements and Zoning Ordinances must support Housing Elements. As long as zoning allows more profitable uses (e.g., office in recent years) that add jobs without requiring commensurate housing, the situation will continue to worsen.

Zoning for housing from the state level is an unnecessarily blunt instrument. Zoning at a city level takes into account unique characteristics and the infrastructure of the community.

There are better alternatives that address land use.

The methodology should focus on jobs/housing ratio at sub-regional levels, and require inclusion of this consideration in Housing Elements and require support through the Land Use Elements and Zoning Ordinances. Further, provide incentives, not sticks, for sub-regions to work it out.

Respectfully submitted,

Patti Fry

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