November 27, 2020
Mayor Jesse Arreguin, President
Executive Board, Association of Bay Area Governments
375 Beale Street, Suite 700
San Francisco, CA 94105

RE: Proposed RHNA Methodology and Subregional Shares - Support for **Option 8A** using the Plan Bay Area 2050 **Households** Baseline with while addressing **overallocation to unincorporated county areas**

Dear President Arreguin and ABAG Executive Board,

We are a diverse set of organizations and stakeholders from across the region focusing on housing, the environment, and the economy. **We strongly support ABAG's proposed RHNA methodology, known as the "High Opportunity Areas Emphasis & Job Proximity" methodology ("Option 8A") using the Plan Bay Area 2050 Households baseline.** However, we also support a data driven adjustment from unincorporated counties to ensure that the methodology meets statutory requirements to promote infill development and protect the environment.

Option 8A represents a sound compromise born of an in-depth, iterative process at the ABAG Housing Methodology Committee. Over the last year, this diverse group of local elected officials, city and county staff, and community stakeholders engaged in robust discussion on every aspect of the methodology. We appreciate the hard work and compromise of this committee, and the support of ABAG in adopting this recommendation. **We believe an adjustment in the unincorporated county allocations falls within the spirit of this methodology and we look forward to supporting cities, counties and ABAG/MTC staff in making this adjustment.**

As ABAG staff has demonstrated through a set of performance metrics, Option 8A performs well on all five of RHNA's statutory objectives. This methodology will help our region improve our environment, reduce our commutes, and ensure every resident has a stable home they can afford:

1. Improve our Environment: Option 8A will help improve our environmental health and mitigate climate change in several ways:
    a. The "Access to High Opportunity Areas" factor allocates more homes in jurisdictions with high quality economic, educational, and *environmental*

opportunity.[1] This means that more homes, especially affordable homes, will be allocated to jurisdictions with quality jobs, adequately-resourced schools, and minimal pollution.

    b. The 70 percent weight to the "Access to High Opportunity Areas" factor for affordable homes will require jurisdictions that have mostly zoned for single-family homes to now zone for multi-family housing to meet the very low- and low-income allocations.[2] Multi-family buildings, such as apartments, are more efficient uses of our space and they use less energy, water, and land than single-family neighborhoods.[3]

    c. The Plan Bay Area 2050 Households baseline and job proximity factors allocate more homes near projected job growth, thereby reducing commutes and greenhouse gas emissions.

2. <u>Reduce our Commutes</u>: Option 8A will reduce commutes for *all kinds of jobs*, not just the tech jobs in Silicon Valley, in order to meet the new statutory jobs-housing fit requirement. Jobs-housing fit is a jurisdiction's ratio of low-wage jobs to homes affordable to those workers.[4] Those workers include farmworkers, service workers at our tourist destinations, homes, offices, and schools, and many more.

3. <u>Stable Homes for all Bay Area Residents</u>: Residents across the Bay Area have a wide range of income levels but those on the lower end have few options affordable to them. Option 8A helps ensure that there will be new homes affordable in every part of the region.

In short we believe that option 8A is the best methodology in meeting the goals of the RHNA process. However, we understand that there are limitations to the methodology process, particularly around the differences in incorporated and unincorporated jurisdictions. **We are concerned that the high allocations for unincorporated areas, which are primarily rural, agricultural, or open space, will significantly increase pressure to zone for housing in areas at high risk for fire, over PCAs, on productive agricultural lands, or proximate to critical habitat linkages.** We also know that the goals of the recommended methodology and the Plan Bay Area 2050 projections are meant to focus growth within our cities and towns, protecting natural and working landscapes and maintaining existing urban growth boundaries. To that end we support the ongoing efforts of cities, counties, and ABAG/MTC staff in the following areas:

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[1] California Tax Credit Allocation Committee's Opportunity Mapping Methodology 2020; Environmental opportunity is based on CalEnviro Screen 3.0, which measures the level of environmental health in each census tract, including the extent of air and water pollution.

[2] Cal. Gov. Code Section 65583.2(c)(3)(B).

[3] "Apartments in buildings with 5 or more units use less energy than other home types," U.S. Energy Information Administration (June 2013).

[4] "Low-wage Jobs-housing Fit: Identifying Locations of Affordable Housing Shortages," UC Davis (Feb. 2016).

Subregional methodologies: Our perspective is that overall, cities and counties should work together to ensure that county land can provide the important open space and farming benefits that we all appreciate, and cities can provide the homes, jobs, and services that we need. We support the efforts of Napa and Solano Counties in their subregional processes and we recommend that in future cycles, more counties enter into similar agreements.

Data-based city-county adjustments: although not all counties have official subregional agreements, we're heartened to see the cities, counties, and regional agency staff working hard to identify ways to reallocate units away from unincorporated areas, fulfilling the statutory RHNA goals of protecting environmental and agricultural resources. We encourage cities around the region to work collaboratively with their county counterparts to ensure we are all doing our part to accommodate the homes we need while protecting our rural areas that provide much needed agricultural, fire resilience, recreational, and habitat benefits. With this adjustment, we request that the additional housing allocations for unincorporated counties across the region be significantly reduced to maintain consistency with climate goals and strategies with Plan Bay Area and the State of California.

Thank you for working with us to make our region more resilient.

Organizations

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Green Foothills

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Kelsey Banes
Peninsula for Everyone

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East Bay for Everyone

South Bay YIMBY

Individuals

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Kirsten Aguila, San Jose
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