

TRAINWRECK

Problems Created by ABAG's RHNA Housing Allocations for Unincorporated Santa Clara County



Rural Santa Clara County Is Threatened by RHNA-Related Development

Over 4,100 new housing units should be built within unincorporated areas of Santa Clara County – more than half of them within areas that are currently rural – according to the Regional Housing Needs Assessment (RHNA) process administered by the Association of Bay Area Governments (ABAG).

That's almost 4,000 units more than the County's previous allocation during the last RHNA round – and it poses a serious threat to our ability to address current challenges and achieve future goals, including those related to increasing climate resilience.



It's a Land Use and Environmental Trainwreck in the Making

ABAG's ill-advised RHNA housing allocation to the County, if not reduced to a reasonable level, will create chaos and uncertainty regarding longstanding, countywide urban development and rural area land use policies that support Plan Bay Area's goals.

ABAG's proposed RHNA allocation could lead to a public policy "trainwreck" that accomplishes nothing – not for housing affordability, not for climate resilience, not for social and economic equity, not for Plan Bay Area, and not for Santa Clara County.



RHNA Allocation Runs Contrary to Goals of Plan Bay Area

ABAG's Plan Bay Area calls for accommodating the region's future growth and development within existing urban areas at higher densities that can be better served by transit. It also discourages new greenfield development on our farmlands and fire-prone hillsides. It is intended to achieve a variety of social, economic, and environmental goals.

If Santa Clara County were to plan for rural area development in accordance with its RHNA allocation, the results would be the exact opposite of Plan Bay Area's basic goals.



ABAG's RHNA Process is Broken

ABAG's RHNA process has a fundamental flaw – it fails to take into account Santa Clara County's unique, longstanding countywide urban development policies that state that urban development should occur only within cities – not in rural unincorporated areas under the County's land use jurisdiction. It treats the County as though it were a city.

Building a significant amount of new housing units in rural unincorporated areas would be directly contrary to basic urban development policies agreed to by the County, its 15 cities, and the Local Agency Formation Commission (LAFCO) almost 50 years ago.



It's ABAG's Problem to Fix

It has been suggested that the County should solve this RHNA problem by asking its cities to voluntarily accept its RHNA allocation. That's putting the responsibility on the County to solve a problem created by a flaw in ABAG's RHNA process.

If that voluntary approach fails to bring the County's allocation down to levels achievable within the framework of current, longstanding, countywide urban development policies, ABAG should act responsibly and reallocate the great majority of the County's unincorporated areas RHNA allocation to urban areas within cities.

ABAG created the problem. ABAG needs to own it. ABAG needs to fix it.