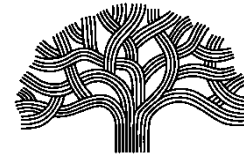


CITY OF OAKLAND



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VIA ELECTRONIC MAIL

November 19, 2020

Mayor Jesse Arreguin, President
Executive Board, Association of Bay Area Governments
375 Beale Street, Suite 800
San Francisco, CA 94105
rhna@baymetro.gov

RE: Regional Housing Needs Allocation Proposed Methodology, 2023-2031 – Support for the Proposed Methodology (Option 8A using the Plan Bay Area 2050 Households Baseline)

Dear Mayor Arreguin and ABAG Executive Board:

Thank you for the opportunity to comment on the proposed methodology for the Bay Area’s Regional Housing Needs Allocation (RHNA) process for the 2023-2031 cycle. The region’s housing crisis continues and the RHNA process is a critical element in ensuring that all jurisdictions in the Bay Area are in a position to help solve this crisis.

I strongly encourage you to support the current proposed RHNA methodology – Option 8a using the Plan Bay Area 2050 Households Baseline. The current proposed methodology will help address global climate change and systemic racism by reducing greenhouse gases and affirmatively furthering fair housing. The proposed methodology is the best available option for the following reasons:

- **The proposed methodology addresses the region’s housing and climate crises by promoting infill development near jobs and transit and by providing access to high opportunity areas.** It is consistent with the Draft Blueprint for growth in Plan Bay Area 2050 and allocates close to 40 percent of the housing growth to the three big cities – Oakland, San Francisco and San Jose – while meeting RHNA’s statutory objective to affirmatively further fair housing.
- **The Housing Methodology Committee (HMC) process was thorough and fair.** The HMC was a diverse group of stakeholders comprised of local elected

officials, local jurisdiction staff and representatives from local and regional advocacy organizations. It spent a year analyzing this highly technical and complex issue.

- **The proposed methodology reflects a compromise.** Some HMC members voted to place a greater emphasis on access to high opportunity areas and some members voted to place a greater emphasis on proximity to jobs and transit. There is no single solution that will please every jurisdiction in the region. The proposed methodology strikes a delicate balance.
- **New alternatives weren't analyzed by the HMC.** I am concerned about the ABAG Executive Board exploring new methodology alternatives that weren't vetted by the HMC. We're running out of time. Consideration of new alternatives could delay the RHNA process. Jurisdictions need as much time as possible to update their Housing Element which will be more challenging this cycle due to the much higher number of housing units allocated to the region by the State.

I strongly urge you to **reject alternatives, such as changing the baseline to Plan Bay Area 2050 Growth, that perform worse on the statutory objectives' performance metrics.** Alternative proposals that use Plan Bay Area 2050 Growth as the baseline, for example, fail to meet the statutory objective to affirmatively further fair housing and perform worse than the current proposed methodology on almost all other metrics. While this alternative may appeal to some jurisdictions who will see their allocation decrease, it shifts housing units to other jurisdictions, upsetting the delicate balance found in the current proposal.

If any further adjustments to the methodology are made, they should instead perform holistically better on the metrics and objectives. One such adjustment is the **Equity Adjustment**, which improves the methodology's performance on the affirmatively furthering fair housing objective. The Equity Adjustment ensures that racially and/or economically exclusive jurisdictions receive a fair and proportional share of very low- and low-income allocations.

Thank you again for this opportunity. I deeply appreciate your work on the RHNA process and believe that the current proposed methodology is the best available option to address our climate and housing crises while addressing racial inequities in our region.

Sincerely,



Libby Schaaf
Mayor of Oakland

Cc: Ed Reiskin, City Administrator
Shola Olatoye, Director of Housing and Community Development
William Gilchrist, Director of Planning and Building