

LOSALTOS HILLS



CALIFORNIA

November 20, 2020

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

RE: Public Comment on Proposed RHNA Methodology

Dear Board President Arreguin and Members of the Executive Board:

On behalf of the Town of Los Altos Hills, please accept these comments when you move forward with consideration of the proposed Regional Housing Needs Allocation (RHNA) Methodology for the upcoming housing cycle. The Town is fully committed to doing its part to plan for new housing that supports the needs of our community and the greater Bay Area region, but we have serious concerns that the process is moving forward without proper consideration of the new reality that our community and the State now face.

It is too early to know the full extent of how the Covid-19 pandemic will impact the Bay Area economy and long-term growth of our region, but it is undeniable that it will have a meaningful effect on our economy, employment and the very nature of how people live and work. Thus, we are strongly encouraging the Executive Board to recognize this reality, take a pause in the RHNA Methodology process and work with the State and other regional planning partners to study and understand the ramifications that the pandemic will have on the Bay Area region before finalizing the Methodology.

In addition, the RHNA Methodology is using growth goals contained in Plan Bay Area 2050 that are projected over a 30-year time horizon, so to apply these long-term growth “targets” as the basis for the next eight-year RHNA allocation methodology is fundamentally flawed and sets up growth expectations that are impossible to achieve. There have also been serious questions raised about the underlying data that was used to develop the growth projections in Plan Bay Area 2050 and the model that was used to distribute that growth. Beyond the aggressive growth assumptions and lack of consideration of how the pandemic will change the region’s long-term growth, the distribution model does not appear to include an appropriate level of consideration to growth constraints such as infrastructure capacity, wildfire risk, and preservation of open space. Thus, in addition to pausing the RHNA process so that the impacts of the pandemic can be accounted for, we would strongly encourage you to reconsider the data that is being used to underpin the RHNA Methodology.

26379 Fremont Road
Los Altos Hills
California 94022
650 / 941 - 7222
Fax 650/941-3160

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The RHNA Methodology as currently proposed will result in communities around the Bay Area, and particularly in Santa Clara County, being forced to develop new housing at levels not seen since the post-war housing boom of the 1950s and 1960s. Please take the time to develop a methodology that plans for more realistic goals and does not set growth requirements that are impossible to achieve.

Thank you for your consideration.

Sincerely,



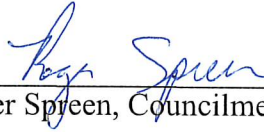
Michelle Wu, Mayor



Kavita Tankha, Vice Mayor



Courtenay C. Corrigan, Councilmember



Roger Spreen, Councilmember



George K. Tyson, Councilmember



Carl Cahill, City Manager

cc: Zach Dahl, Planning and Building Director