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

RE: Proposed Regional Housing Needs Allocation (RHNA) Methodology and Subregional Shares -  
**Support for Option 8A using the Plan Bay Area 2050 Households Baseline with the Equity Adjustment**

Dear President Arreguin and ABAG Executive Board,

On behalf of All Home, we are writing to provide comment on the proposed RHNA Methodology and subregional shares for ABAG RHNA Cycle 6.

All Home is a Bay Area organization that advances regional solutions towards disrupting the cycles of poverty and homelessness and creating more economic mobility opportunities for extremely low-income (ELI) people. We work across counties, sectors, and silos to advance coordinated, innovative solutions and build a movement to challenge the status quo that perpetuates homelessness.

We strongly support ABAG's proposed RHNA methodology, known as the **"High Opportunity Areas Emphasis & Job Proximity" methodology ("Option 8A")**, **but believe the methodology should be amended to include the equity adjustment** to more fully meet the statutory objective of affirmatively furthering fair housing.

This adjustment will result in thousands more affordable units in high-opportunity neighborhoods. It is imperative that we hold ourselves and each other accountable to create a more inclusive Bay Area, one that redresses racial disparities that were caused by more than a century of racially motivated zoning and real estate development practices that promoted segregation and lack of access to opportunity. All Home can support nothing less than a methodology that creates access for all residents to have a safe and affordable home and equal access to environmental, economic, and educational opportunities.

ABAG adopted the Housing Methodology Committee's recommendation due to its strong performance on the statutory objectives of RHNA. A majority of the Committee also supported an equity adjustment. The RHNA process offers our region a tangible opportunity to actively plan for our future housing needs

for the next eight years — while actively designing strategies to address existing housing affordability, patterns of residential segregation, and exclusionary zoning practices.

**Therefore, we stand with a strong and diverse coalition of stakeholders to strongly urge ABAG to respect the integrity of this process and move forward with the Committee’s recommendation, including the equity adjustment.** We request that you reject alternatives that fail to meet the moral imperative of our time, such as changing the baseline, that perform worse on the statutory objectives’ performance metrics and will likely result in further displacement, segregation and racial exclusion. 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 will exacerbate our region’s affordable housing crisis and fail to hold jurisdictions accountable for producing their fair share of affordable housing. Now is the time for the whole Bay Area, all cities and counties, to come together to right the wrongs of the past, move to a fairer and equitable future, and hold each other accountable for producing a fair distribution of affordable housing.

ABAG’s proposed methodology with the Equity Adjustment will help us get there. For these reasons, All Home strongly supports **Option 8A** using the Plan Bay Area 2050 **Households** Baseline with the **Equity Adjustment**.

Thank you again for the opportunity to provide feedback.

Sincerely,

*Tomiquia Moss*

Tomiquia Moss  
CEO and Founder

Cc: ABAG Executive Board