



November 20, 2020

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

Submitted via email to RHNA@bayareametro.gov

Re: Proposed RHNA Methodology and Subregional Shares - Concern Regarding Overalllocation to Unincorporated Counties

Dear President Arreguin and ABAG Executive Board,

The undersigned organizations write today to express concern regarding the significantly increased allocations to unincorporated areas in the recommended housing allocation methodology - Option 8A - for the Regional Housing Needs Allocation (RHNA) Cycle 6 and its potential to impact the natural and working lands of our region. Thank you for this opportunity to communicate our views.

Since its first adoption in 2013, Plan Bay Area has served as the urban growth blueprint for the Bay Area, which focuses regional growth around transportation infrastructure through its Priority Development Area (PDA) program, and strives to provide equitable outcomes to all Bay Area residents. The Priority Conservation Area (PCA) program has created avenues to enhance regionally significant natural landscapes, public access, and habitats surrounding the built environment, and to provide respite for the densifying PDAs (Attachment 1). The vision set out by Plan Bay Area is one that seeks balance between growth in the built environment and sound stewardship of the vital resources provided by our natural and working lands, such as clean air, clean water, food, and access to nature. These Priority Conservation Areas also provide critical ecosystem services to support denser urban and suburban areas that recharge groundwater aquifers, uptake millions of tons of carbon from the atmosphere while producing oxygen, reduce downstream flooding risk, maintain clean fresh water within creeks and waterways, support local food production, and protect sensitive/rare/endemic plants and wildlife including key pollinators. The vision set out by Plan Bay Area is one that seeks balance between growth in the built environment and the vital resources and services provided by our natural and working lands.

Supporting regional and statewide objectives to address the housing crisis we face in California is vitally important. To this end, we strongly support strategies to promote urban infill, support climate smart transportation initiatives, and to leverage nature-based solutions to climate threats, which are solutions that typically provide multiple benefits to communities, such as increased livability, more equitable access to nature, and improved habitat for wildlife, water, and food production. We support continued evaluation of housing needs and further refinement of Plan Bay Area to better meet SB 375 (Steinberg, 2009) goals. **However, we see within the recommended housing allocation methodology, an enormous increase of housing allocations to**

unincorporated counties, which will inevitably pressure local governments and cities into zoning lands that are inappropriate for housing in order to meet those requirements.

For example, in unincorporated Santa Clara County alone, the allocation of housing units increased from 277 units in RHNA 5 to 4,137 for RHNA 6, representing a nearly 1,400 percent increase. Other unincorporated counties are projecting similar drastic increases through the proposed methodology:

Unincorporated County	RHNA 5 Allocation	RHNA 6 Allocation	% Increase
Alameda	1,769	4,530	156%
Contra Costa	1,367	5,827	326%
Marin	185	3,820	1,965%
Napa	180	792	340%
San Mateo	913	2,933	221%
Santa Clara	277	4,137	1,394%
Solano	103	1,016	886%
Sonoma	515	5,257	921%

We are very concerned that such 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 (Attachment 2). We also know the proximity of concentrated growth near critical habitat raises a host of issues, like the potential loss of adjacent habitat, habitat fragmentation, and increased use of rodenticides with their collateral effects on predators like mountain lions and bobcats in the vicinity.

Furthermore, we see these allocations as running counter to objectives stated in state housing element code Section 65584(d)(2)¹:

(2) Promoting infill development and socioeconomic equity, the protection of environmental and agricultural resources, the encouragement of efficient development patterns, and the achievement of the region’s greenhouse gas reductions targets provided by the State Air Resources Board pursuant to Section 65080.

The goal of Plan Bay Area, per SB 375, is to reduce greenhouse gas emissions by focusing housing near jobs and transit. The allocation of significant increases in housing units to the unincorporated (rural) counties accelerates sprawl, which is exactly counter to the strategic goals Plan Bay Area is trying to achieve. **Housing allocations must be consistent with the intent to stop greenfield development, and instead practice smart growth strategies that apply infill construction within the existing urban footprint of our communities.**

Importantly, with the latest megafires serving as a backdrop, the potential for wildland fire embers to be carried by winds for miles into the built environment is well-documented. Homes in and near the wildland-urban interface (the WUI) are at particular risk if adequate defensible spaces and home hardening measures have not been taken (please see Attachment 3,4). **Increased, concentrated development in the WUI, incentivized by the pressure of high RHNA**

¹ http://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?sectionNum=65584.&lawCode=GOV

allocations to unincorporated areas, does not follow best practices in mitigating the threat of catastrophic wildfire that risks lives and property. A 2017 insurance analysis shows that almost 350,000 homes in the Bay Area are in areas at high or extreme risk of wildfire already.² We must avoid exacerbating this deadly problem by unintentionally spurring development in the WUI.

For all of the reasons stated, while we support Option 8A and believe it furthers our environmental goals on the whole, we request that the additional housing allocations for unincorporated counties across the region be significantly reduced or eliminated, to maintain consistency with climate goals and strategies with Plan Bay Area and the State of California.

We appreciate your consideration for these concerns and look forward to speaking with you should you have any questions.

Sincerely,

Ana M. Ruiz
General Manager
Midpeninsula Regional Open Space District

Annie Burke
Executive Director
TOGETHER Bay Area (Attachment 5)

Andrea Mackenzie
General Manager
Santa Clara Valley Open Space Authority

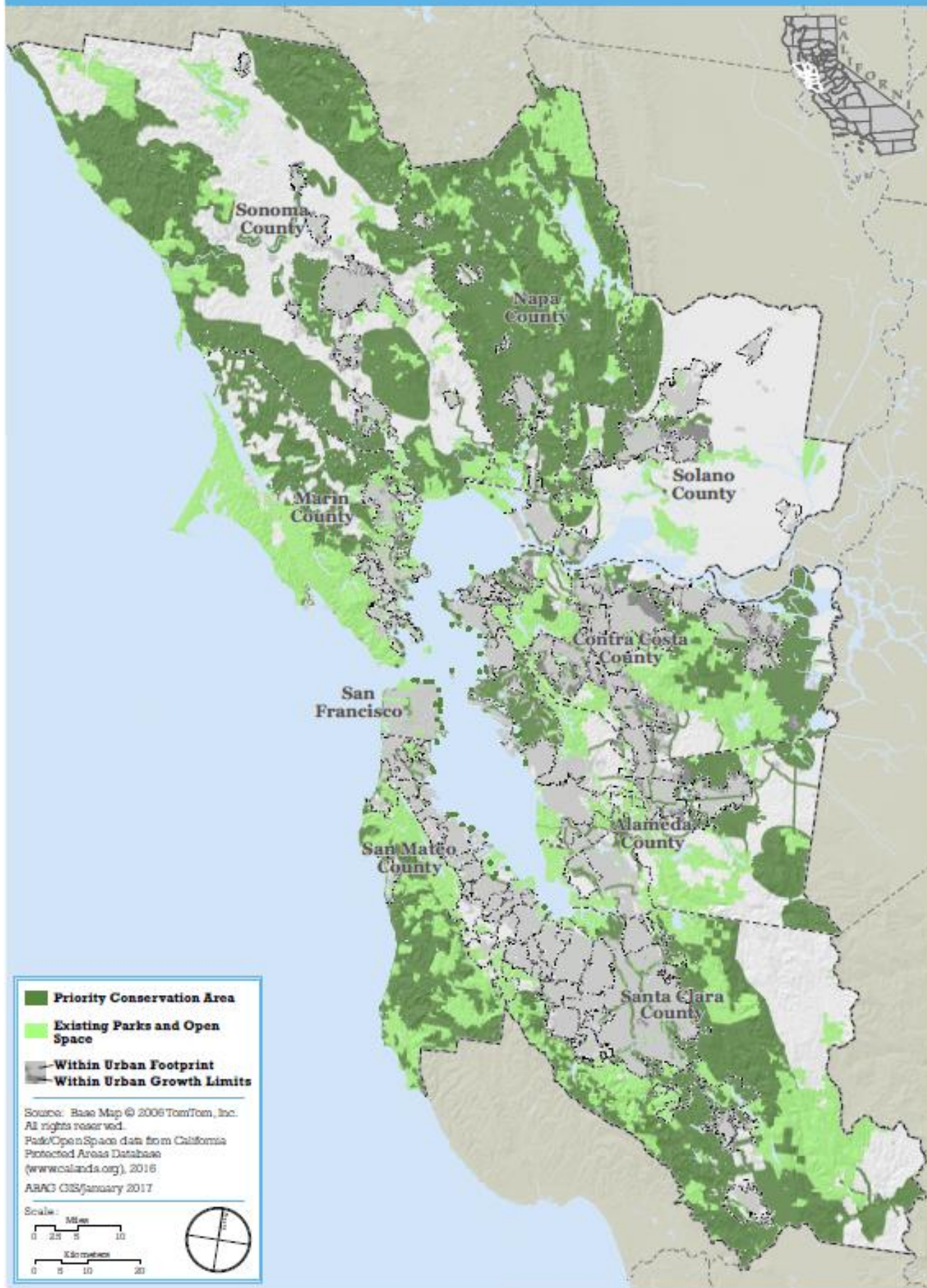
Megan Fluke
Executive Director
Green Foothills

Walter Moore
President
Peninsula Open Space Trust

Attachments:

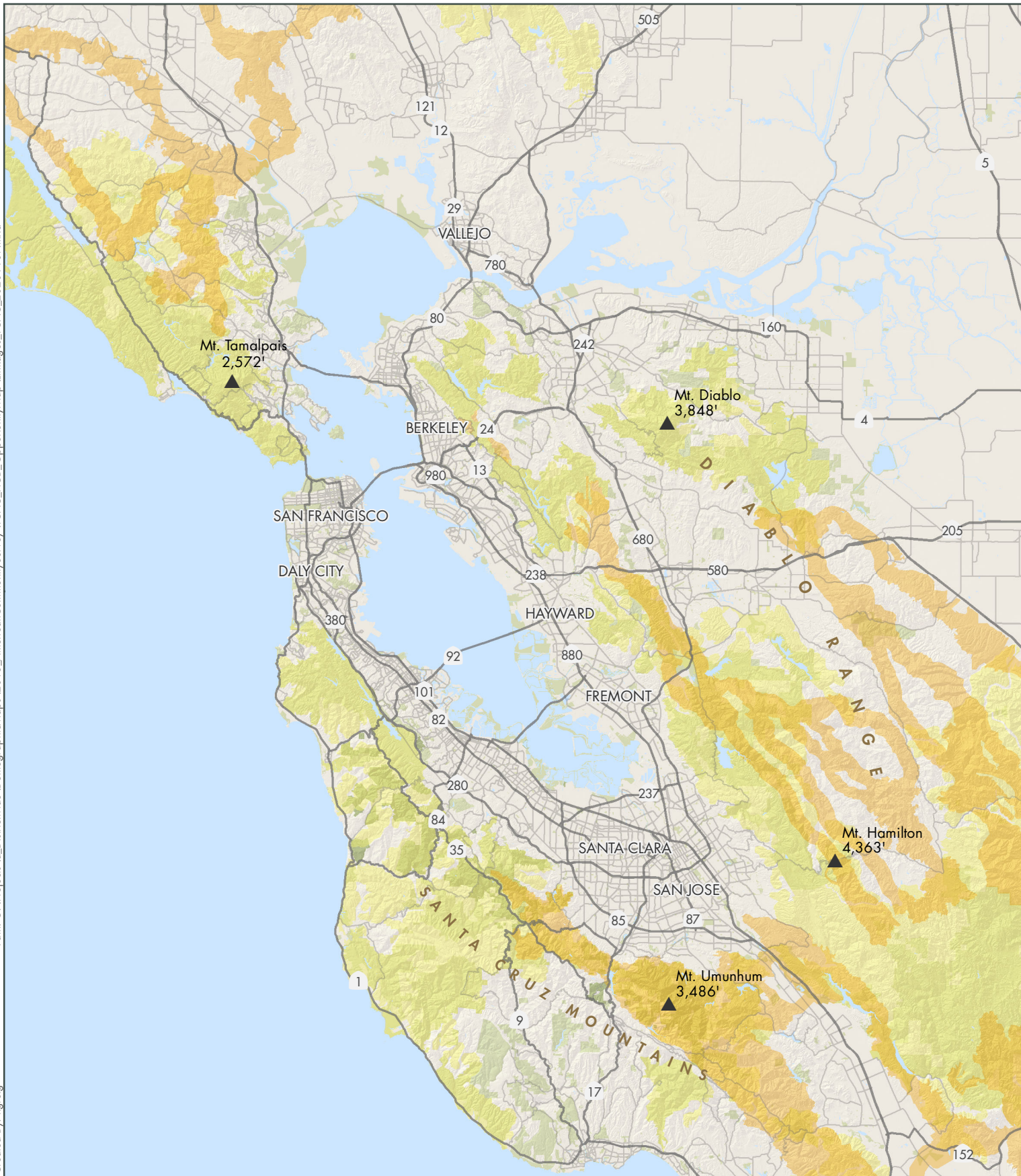
1. Bay Area PCA Map (ABAG)
2. Bay Area Critical Habitat Linkages (MROSD)
3. HCD/TCAC High Opportunity Areas and Wildland-Urban Interface Map (MROSD)
4. Bay Area Fire Hazard Severity Zone Map (CalFire)
5. Member list of TOGETHER Bay Area

² <https://www.sacbee.com/news/california/fires/article216076320.html>



Priority Conservation Areas - Potential for Expansion of Parks, Urban Greening, and Protected Open Space





Bay Area Critical Linkages

- Midpen preserve
- Other protected land
- Critical Wildland Linkage
- Large Wildland Landscape Block
- Private land

Sources: Science and Collaboration for Connected Wildlands

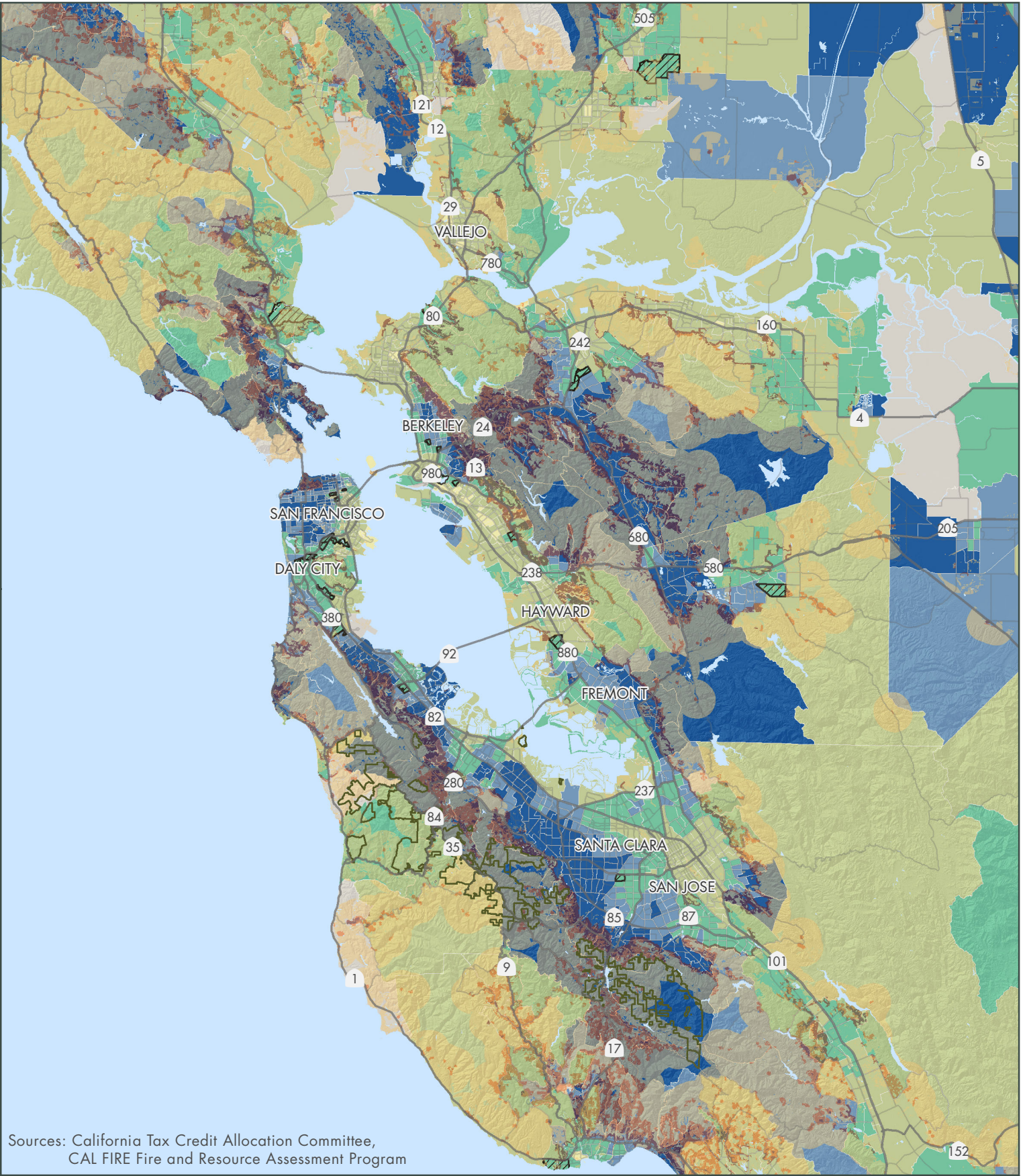
Midpeninsula Regional
Open Space District
(Midpen)



11/9/2020














While the District strives to use the best available digital data, these data do not represent a legal survey and are merely a graphic illustration of geographic features.




Sources: California Tax Credit Allocation Committee, CAL FIRE Fire and Resource Assessment Program


TCAC/HCD Opportunity Areas

Opportunity	 Highest resource	 Low resource	FRAP WUI	 Midpen preserves
	 High resource	 High segregation & poverty		 Influence zone
	 Moderate, resource (rapidly changing)	 Missing or insufficient data		 Intermix
	 Moderate resource			 Interface

Midpeninsula Regional
Open Space District
(Midpen)

10/12/2020

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TOGETHER BAY AREA

Founding Members

The following 65 public agencies, Indigenous Tribes, and nonprofits in the 10-county San Francisco Bay Area are Founding Members

[Alameda County Resource Conservation District](#)
[Amah Mutsun Land Trust](#)
[Bay Area Ridge Trail Council](#)
[Brown Girl Surf](#)
[Bull Valley Agricultural Center](#)
[California Academy of Sciences](#)
[California Invasive Plant Council \(Cal-IPC\)](#)
[California Mountain Biking Coalition](#)
[City of American Canyon](#)
[Claremont Canyon Conservancy](#)
[Coastside Land Trust](#)
[David R. Brower, Ronald V. Dellums Institute for Sustainable Policy Studies](#)
[East Bay Municipal Utility District](#)
[East Bay Regional Park District](#)
[East Contra Costa County Habitat Conservancy](#)
[Friends of Five Creeks](#)
[Golden Gate National Parks Conservancy](#)
[Golden Hour Restoration Institute](#)
[Grassroots Ecology](#)
[Land Trust of Santa Cruz County](#)
[LandPaths](#)
[Mare Island Heritage Trust](#)
[Marin Conservation League](#)
[Marin Agricultural Land Trust](#)

[Marin County Parks](#)
[Marin County Bicycle Coalition](#)
[Marin Municipal Water District](#)
[Marin Open Space Trust](#)
[Midpeninsula Regional Open Space District](#)
[Mountain Bikers of Santa Cruz](#)
[Muwekma Ohlone Tribe of the San Francisco Bay Area](#)
[Napa County Regional Park and Open Space District](#)
[National Park Service – Golden Gate National Recreation Area, Rosie the Riveter/WWII Home Front NHP](#)
[Oakland Parks and Recreation Foundation](#)
[Paula Lane Action Network \(PLAN\)](#)
[Peninsula Open Space Trust](#)
[Pie Ranch](#)
[Rails-to-Trails Conservancy](#)
[River Otter Ecology Project](#)
[San Francisco Bay Trail](#)
[San Francisco Public Utilities Commission](#)
[San Francisco Recreation and Parks Department](#)
[San Mateo County Parks](#)
[San Mateo County Parks Foundation](#)
[San Mateo Resource Conservation District](#)

[Santa Clara County Parks and Recreation Department](#)
[Santa Clara Valley Open Space Authority](#)
[Santa Cruz County, Parks, Open Space & Cultural Services](#)
[Save Mount Diablo](#)
[Save the Redwoods League](#)
[Sempervirens Fund](#)
[Solano Land Trust](#)
[Sonoma County Ag + Open Space](#)
[Sonoma County Regional Parks](#)
[Sonoma Land Trust](#)
[Sonoma Water](#)
[Student Conservation Association \(SCA\)](#)
[Sustainable Agriculture Education \(SAGE\)](#)
[The California Urban Streams Partnership](#)
[The Field Semester](#)
[Tri-Valley Conservancy](#)
[Urban Bird Foundation](#)
[Valley Water](#)
[YES Nature to Neighborhoods](#)
[Youth Outside](#)

Please note, National Park Service members do not participate in our coalition's advocacy efforts.