



Scenic Pacifica  
Incorporated Nov. 22, 1957

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## CITY OF PACIFICA

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[www.cityofpacifica.org](http://www.cityofpacifica.org)

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**MAYOR**  
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November 24, 2020

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

RE: Comments on the Proposed Methodology for the 6<sup>th</sup> Cycle Regional Housing Need Allocation

Dear Chair Arreguin,

On behalf of the City of Pacifica (City), please accept our comments on the proposed Regional Housing Needs Allocation (RHNA) methodology. The proposed methodology would result in a 367% increase (1,933 units) in unit allocation from RHNA 5.

The City appreciates the efforts and dedication of the diverse stakeholder group of Housing Methodology Committee (HMC) members and the inclusion of equity factors in the draft 6<sup>th</sup> Cycle RHNA methodology. Pacifica understands the urgency and challenge of addressing regional policy goals related to housing affordability, climate change and equity in this RHNA cycle. However what the HMC and Executive Board may not realize, is the incorporated area in Pacifica is 47% preserved open space with much of this land owned by other agencies such as the Federal Government (Golden Gate National Recreation Area). Pacifica is also partially in the Coastal Zone (15% of incorporated area). As a result, the City of Pacifica has no or limited land use authority over 67% of the City's incorporated acreage and finding adequate sites to accommodate the unit allocation that would result from the proposed methodology will be extremely difficult. The draft methodology also allocates new housing units to jurisdictions, like Pacifica, that lack adequate transportation infrastructure; are subject to hazards such as wildfires; and have other significant development constraints, such as coastal erosion.

The draft methodology and resulting RHNA, will not only fail to meet the Bay Area's total regional housing need, but will threaten our region's ability to grow sustainably into the

future. The result of the draft methodology is to push a greater proportion of new development into areas that will promote auto dependency and longer commute times, exacerbate GHG impacts, and run counter to the goals and objectives of the recently released Plan Bay Area Blueprint. To avoid these outcomes, we recommend consideration of the following changes to the recommended methodology:

- Utilize Plan Bay Area 2050 household *growth* rates between 2019 and 2050 as the baseline for the RHNA allocation rather than Plan Bay Area future households in 2050. Using the Plan Bay Area 2050 *Growth* baseline will encourage housing development in proximity to job centers, reduce transportation congestion, and reduce greenhouse gas emissions, consistent with both AB 32 and SB 375.
- Leave the HMC factors, including equity factors, in place.

By modifying only the baseline factor, the suggested modifications will continue to be consistent with RHNA statutory objectives to:

1. Increasing the housing supply and mix of housing types, tenure, and affordability;
2. Promote infill development and socioeconomic equity, protecting environmental and agricultural resources, and encouraging efficient development patterns;
3. Promoting an improved intraregional relationship between jobs and housing;
4. Balancing disproportionate household income distributions; and
5. Affirmatively furthering fair housing

Again, Pacifica recognizes the challenge that the HMC faced in developing an appropriate allocation methodology and we appreciate your consideration of our recommendation and perspectives.

Sincerely,



Deirdre Martin  
Mayor

cc: City Council  
Planning Commission