

**From:** Susan Kirsch <[REDACTED]>  
**Sent:** Wednesday, November 25, 2020 9:03 AM  
**To:** Regional Housing Need Allocation  
**Subject:** Reject RHNA Methodology

**\*External Email\***

November 25, 2020

Mayor Jesse Arreguin, President  
ABAG Executive Board  
c/o ABAG & MTC Public Information Office  
[RHNA@bayareametro.gov](mailto:RHNA@bayareametro.gov)

Dear President Arreguin and ABAG Executive Board Members:

**Summary:** Reject the proposed RHNA Methodology until the accuracy of the housing numbers is confirmed, the assumptions are aligned with the reality of state (not national) trends in a post-COVID world; and the legality of the decision is determined.

1. California's housing need isn't as great as the state claims. It is irresponsible to approve the Methodology until the approach to determine the numbers is proven reliable.

The Embarcadero Institute's report "[Double Counting in the Latest Housing Needs Assessment](#)" (September 2020) finds, "Use of an incorrect vacancy rate and double counting, inspired by SB-828, caused the state's Department of Housing and Community Development to exaggerate by more than 900,000 the units needed in SoCal, the Bay Area and the Sacramento area."

"The state's approach to determining the housing need must be defensible and reproducible if cities are to be held accountable. Inaccuracies on this scale mark the fact that cities and counties are surpassing the state's market-rate housing targets but falling far short in meeting affordable housing targets."

2. The assumptions of the RHNA Methodology are unreliable. It is irresponsible to approve the Methodology until the assumptions are aligned with the reality of COVID-19, remote work, changing transportation patterns, an exodus from California, and deepening economic upheaval.

3. RHNA Methodology that usurps local authority endowed to elected City Councils or Boards of Supervisors will not go unchallenged. Nor will community leaders, homeowners, and renters stand by as HCD foists irrational, wildly inflated housing quotas on communities. [CalMatters columnist Dan Walters](#), reporting about the Embarcadero Institute report writes, "resistance has developed among affected local governments and officials are mulling whether to challenge them in court."

**THERE IS A BETTER WAY!** Reject the unreliable RHNA Allocation Methodology. Take time to collaborate with locally elected officials and community leaders to get it right. With accuracy and collaboration, housing needs can be solved.

Sincerely,

***Susan Kirsch, Political Advisor  
Chair, Nix-the-Nine Campaign***

