

From: Pat Marriot <[REDACTED]>
Sent: Wednesday, November 25, 2020 11:48 AM
To: Regional Housing Need Allocation
Subject: Please reject RHNA methodology

External Email

Dear President Arreguin and ABAG Executive Board Members:

I urge you to 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. Our housing need isn't as great as the state claims. We need numbers that are proven to be reliable before approving the Methodology.

Please refer to the Embarcadero Institute's report ["Double Counting in the Latest Housing Needs Assessment"](#) which says: *"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. Methodology assumptions are unreliable. Methodology should not be approved they take into account the reality of COVID-19, working from home, changing transportation patterns, the exodus from California, and economic upheaval.

3. Methodology that takes away local authority of elected city councils will not go unchallenged. Community leaders, homeowners, and renters will not stand by as the HCD pushes wildly inflated housing quotas on them. [CalMatters columnist Dan Walters](#), reporting on the Embarcadero Institute report writes, *"resistance has developed among affected local governments and officials are mulling whether to challenge them in court."*

Please reject the unreliable RHNA Allocation Methodology. Take time to collaborate with locally-elected officials and community leaders and do the right thing.

Thank you,
(Ms.) Pat Marriott [REDACTED]