



November 25, 2020

Jesse Arreguin, Executive Board President  
Association of Bay Area Governments  
Bay Area Metro Center  
375 Beale Street, Suite 800  
San Francisco, CA 94105-2066

RE: Public Comment on Proposed RHNA Methodology

Dear President Arreguin and Honorable ABAG Executive Board Members:

On behalf of the City of Los Altos, we would like to thank ABAG's leadership and staff for all of your hard work and dedication over the course of the past year through the Housing Methodology Committee (HMC) process.

The City of Los Altos, in agreement with the Cities Association of Santa Clara County, objects to a methodology that allocates the largest share to Santa Clara County and unreasonable shares to the City of Los Altos. We further agree with the Cities Association that the RHNA process should be delayed until the State has a better understanding of the impact of COVID, including but not limited to the impact on job and household growth based on the increase in the number of employers allowing employees to telecommute. Additionally, we share the concerns of the Cities Association that a significant portion of the underlying data used in Plan Bay Area 2050 is inaccurate, incomplete and/or outdated.

Like many cities, Los Altos has struggled to meet the much lower numbers that were assigned to us in the previous RHNA process. Assigning even higher numbers, that are completely unrealistic for our city to meet, serves no purpose. We are open and willing to work with ABAG staff to identify the areas where we can expect future development and provide some estimates of what is achievable. We recommend that a realistic approach be used, and support be provided, to identify barriers to building more housing and help local communities like Los Altos tackle those barriers that we can realistically address.

Finally, we understand that the total number of units for the nine Bay Area region was determined by the California Department of Housing and Community Development (HCD). Therefore, we strongly urge ABAG to join us in advocating against moving forward with the RHNA process at this time. Proceeding now will only set local communities up to fail, like Los Altos, and still not help to solve the problem. Instead, we recommend that the HCD, ABAG and representatives from

all cities be invited to partner on developing housing solutions that are realistic and achievable.  
Thank you for hearing our voice and taking appropriate action.



Janis C. Pepper, Mayor



Neysa Fligor, Vice Mayor

cc: Megan Kirkeby, Deputy Director Housing Policy Division, California Department Of  
Housing and Community Development  
Joe Harney, Legislative Division, California Department Of Housing and Community  
Development  
Santa Clara County Cities Association  
Carolyn Coleman, Executive Director, League of California Cities  
Jason Rhine, Legislative Director, League of California Cities  
Seth Miller, Regional Public Affairs Manager, League of California Cities – Peninsula  
Division