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**Subject:** Re: PBA Forecast and RHNA Methodology Equity  
**Date:** Thursday, January 21, 2021 2:29:40 PM  
**Attachments:** [MTC Plan Bay Area RHNA EIR and Subregion Shares \(2\).pdf](#)

**\*External Email\***

Dear Mayor Arreguín, Supervisor Haggerty, and Director McMillian:

We are writing with grave concerns regarding your intention to move significant additional market-rate housing requirements into low-income communities of color as an outcome of your 2020 RHNA allocation (“Final Blueprint Outcomes”) and your recent, rushed update to Plan Bay Area (“Draft RHNA Methodology and Final Subregion Shares”) with a roughly 250% housing increase allotted to San Francisco.

These proposals must be immediately stopped and revised for equity.

Rooted in the Mission District and focused on San Francisco since 1974, as a community-based nonprofit, MEDA’s mission is to strengthen low- and moderate-income Latino families by promoting economic equity and social justice through asset building and community development. In summer 2014, MEDA launched its Community Real Estate (CRE) program as an urgent response to stem the displacement happening to low-income and working-class families in the Mission District. To date, MEDA has preserved or produced a total of 1,269 affordable housing units including 271 units acquired through the City of San Francisco’s Small Sites Program, 439 units of RAD housing, and 557 units of new construction.

This newest PBA update in the form of Final Subregion Shares mirrors the inequitable approach taken in the recent RHNA allocations -- which in combination with SB35 will by default make nearly all market-rate development in San Francisco’s low-income BIPOC communities “by right” in the next RHNA cycle and will also assign significantly more market-rate housing to these communities.

In coordination with this state mechanism these two highly inequitable ABAG/MTC proposals will do significant and irreversible harm to many of our most vulnerable residents by stripping them of their voices, removing the local jobs and other equity opportunities currently associated with new development projects, and encourage demolition, profiteering, gentrification, and further displacement.

The only fully relevant academic study to date in this area is clear about the expected impacts of these decisions on our most vulnerable residents -- prices will be pushed up for those paying the lowest rents near this new market-rate construction.(1)

*It is critical that MTC and ABAG immediately halt approval of this EIR as well as the original RHNA Blueprint allocations proposal and redistribute these allocations through an equity lens that acknowledges and reverses the longstanding inequitable frameworks that brought us to this precarious point in time.*

We realize that there is a significant challenge that ABAG and MTC face as a result of the inequitable market-rate prioritization elements in SB828 and SB35. On the surface these bills suggest that massive regional increases in market-rate housing should be concentrated in core urban at-risk communities such as the Mission. However, this approach would only exacerbate dislocation in this vulnerable neighborhood, which has already lost more than 8,000 Latino residents over the past 20 years.

For these reasons and more, ABAG and MTC must not blindly collaborate with the inequity framework promoted in these state policies, but rather take bold and creative steps to ensure no further harm is done to vulnerable communities through these RHNA and Plan Bay Area updates.

The two ABAG proposals, however, currently demand that San Francisco's low-income and BIPOC communities soon surrender their right to land use self-determination. This would be a terrible outcome for these communities which have already endured generations of oppression through redlining, displacement, and hypergentrification. These communities should be uplifted by steps taken by these bodies and not relegated to surrendering the hope of achieving healthy and safe development outcomes.

These proposals must be paused and reversed immediately in order to be rebuilt from the ground up through an equity-first framework in collaboration with equity advocates throughout the region.

Sincerely,

**Peter Papadopoulos**

*Land Use Policy Analyst*

Mission Economic Development Agency (MEDA)

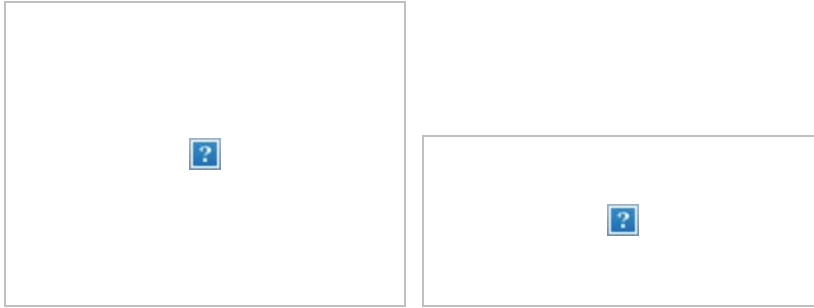
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(1) <https://www.tonydamiano.com/project/new-con/>



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Cada Familia Triunfa. Cada Estudiante Logra.

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Jan 21, 2021

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A handwritten signature in blue ink, appearing to read "Peter Papadopoulos".

Peter Papadopoulos  
Land Use Policy Analyst