



Midpeninsula Regional
OpenSpace

Midpeninsula Regional Open Space District

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October 15, 2020

Jesse Arreguin, President, ABAG Board of Directors
Bay Area Metro Center
375 Beale Street, Suite 800
San Francisco, CA 94105

Re: Regional Housing Needs Allocation – Recommended Methodology and its Impacts to Open Space and Biodiversity Values, Increased Wildfire Risk, Loss of Habitat, and Barrier for Wildlife Corridors

Dear Director Arreguin:

On behalf of the **Midpeninsula Regional Open Space District (Midpen)**, I am writing to provide feedback on the Regional Housing Needs Allocation (RHNA) 6 housing methodology recommended by the ABAG Housing Methodology Committee – Option 8A. Preserving to date nearly 65,000 acres of protected open space on the San Francisco Peninsula, Midpen is one of the largest regional open space districts in California. Midpen spans most of San Mateo County, western Santa Clara County, and the northern reaches of Santa Cruz County. Our mission throughout our jurisdiction is to acquire and preserve a regional greenbelt of open space land in perpetuity, protect and restore the natural environment, and provide opportunities for ecologically sensitive public enjoyment and education, as well as to preserve agricultural land of regional significance, preserve rural character, and encourage viable agricultural use of land resources on the San Mateo County Coast.

Since its first adoption in 2013, Plan Bay Area has served as the urban growth blueprint for the Bay Area, focusing regional growth around transportation infrastructure through its Priority Development Area (PDA) program with a goal for equitable outcomes to all Bay Area residents. Its Priority Conservation Area (PCA) program has created avenues to enhance regionally significant natural landscapes and habitats that surround the built environment as a respite for the densification of PDAs. These Priority Conservation Areas also provide critical ecosystem services to support denser urban and suburban areas that recharge groundwater aquifers, uptake millions of tons of carbon from the atmosphere while producing oxygen, reduce downstream flooding risk, maintain clean fresh water within creeks and waterways, support local food production, and protect sensitive/rare/endemic plants and wildlife including key pollinators. The vision set out by Plan Bay Area is one that seeks balance between growth in the built environment and the vital resources and services provided by our natural and working lands.

While we appreciate the need to continuously evaluate housing needs and further refine Plan Bay Area to better meet the goals of SB 375 (Steinberg, 2009), our sharp concern lies with the housing allocation methodology recommended by the Housing Methodology Committee. **Specifically, we**

wish to raise a deep concern about the enormous increase of housing allocations to unincorporated counties and rural, open space areas. In unincorporated Santa Clara County alone, the allocation of housing units increased from 277 units in RHNA 5 to 4,137 for RHNA 6 – a 1,393% increase. San Mateo County is also seeing a significant increase (913 to 2,933). Our understanding is that other unincorporated counties and rural open space areas around the Bay Area are being allocated similar drastic increases too. We are concerned that such high allocations for primarily rural, agricultural, and open space areas will significantly increase pressure to zone for housing in areas that are at severe risk for fire, impact PCAs, and impact critical habitat linkages that are essential for the sustainability and resiliency of our local biodiversity. Additionally, the proximity to existing PCAs (Attachment 1) raises a host of issues, including loss of habitat connectivity and increased habitat fragmentation, increased wildlife exposure to rodenticides and other hazardous chemicals, increased risk of catastrophic fire and fire ignition sources with severe impacts to both people and natural resources, and loss of scenic landscapes and backdrops that are characteristic and emblematic of the natural beauty that surrounds the Bay Area (Attachments 2, 3, 4).

With the latest megafires in August and September of 2020 serves as a backdrop, the potential for wildland-fire-generated embers that can be carried by winds for miles is well documented. Homes in and near the Wildland-Urban Interface (WUI) (Attachment 5) are at particular risk even with defensible spaces and home hardening measures. In fact, a 2017 insurance analysis shows that almost 350,000 homes in the Bay Area are already located in areas at high or extreme risk of wildfire.¹ Increased, concentrated development in the WUI, incentivized by the pressure of high RHNA allocations, will likely increase wildland fire risk even further – exacerbating the month-long air quality impacts that have affected every single Bay Area resident and negating all the greenhouse gas reduction achievements gained annually by the State of California.

For all of the reasons stated, we recommend that the housing methodology, Option 8A, considered for adoption by the ABAG Executive Board be revised to remain consistent with climate action goals and priority conservation strategies that lie at the heart of Plan Bay Area, are part of state and local jurisdiction goals, and further heightened with Governor Newsom’s recent 30 x 30 executive order issued on October 7, 2020.

We appreciate your consideration for these concerns and look forward to speaking with you should you have any questions.

Sincerely,



Ana M. Ruiz
General Manager

Attachments:

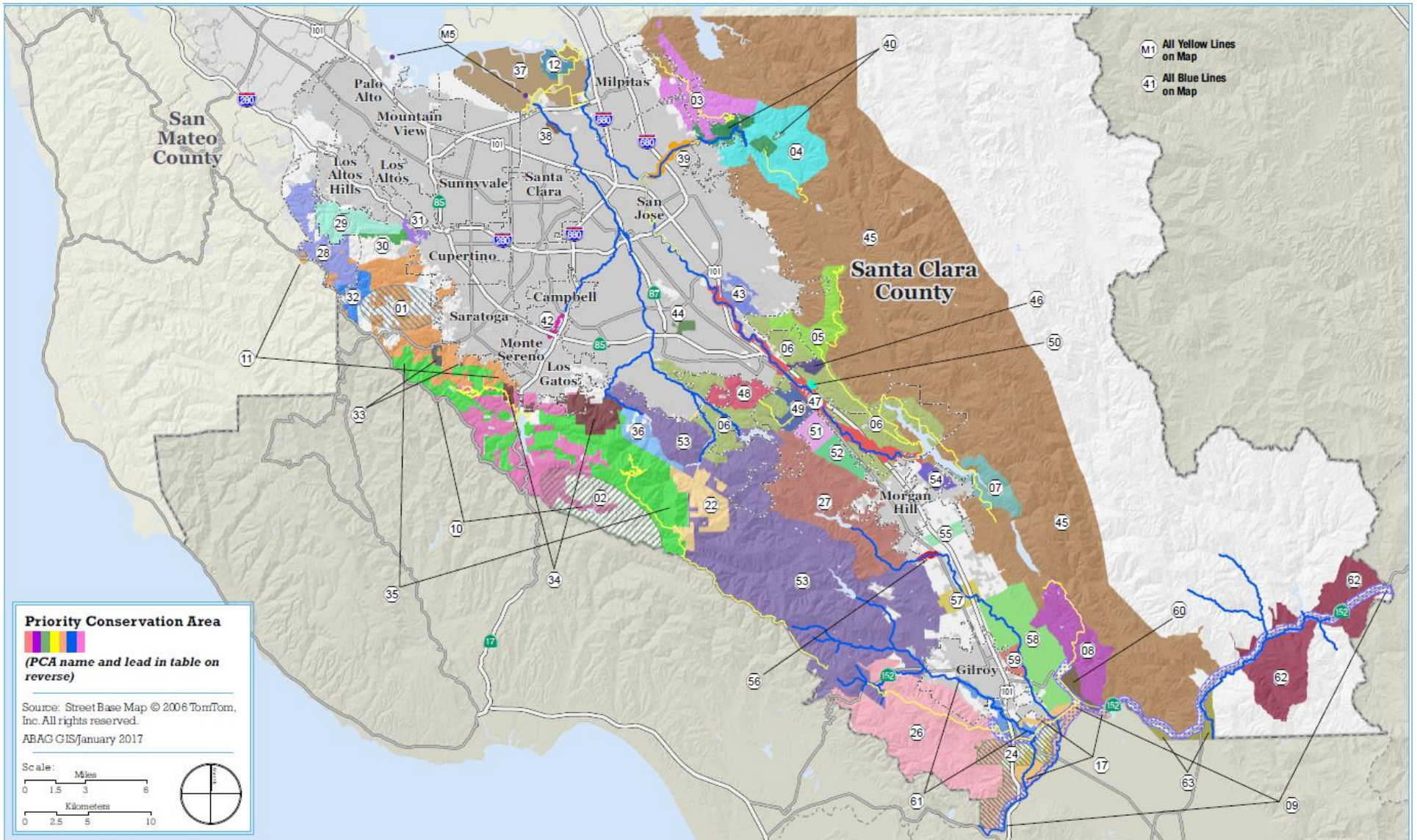
1. Santa Clara County PCA Map (ABAG)

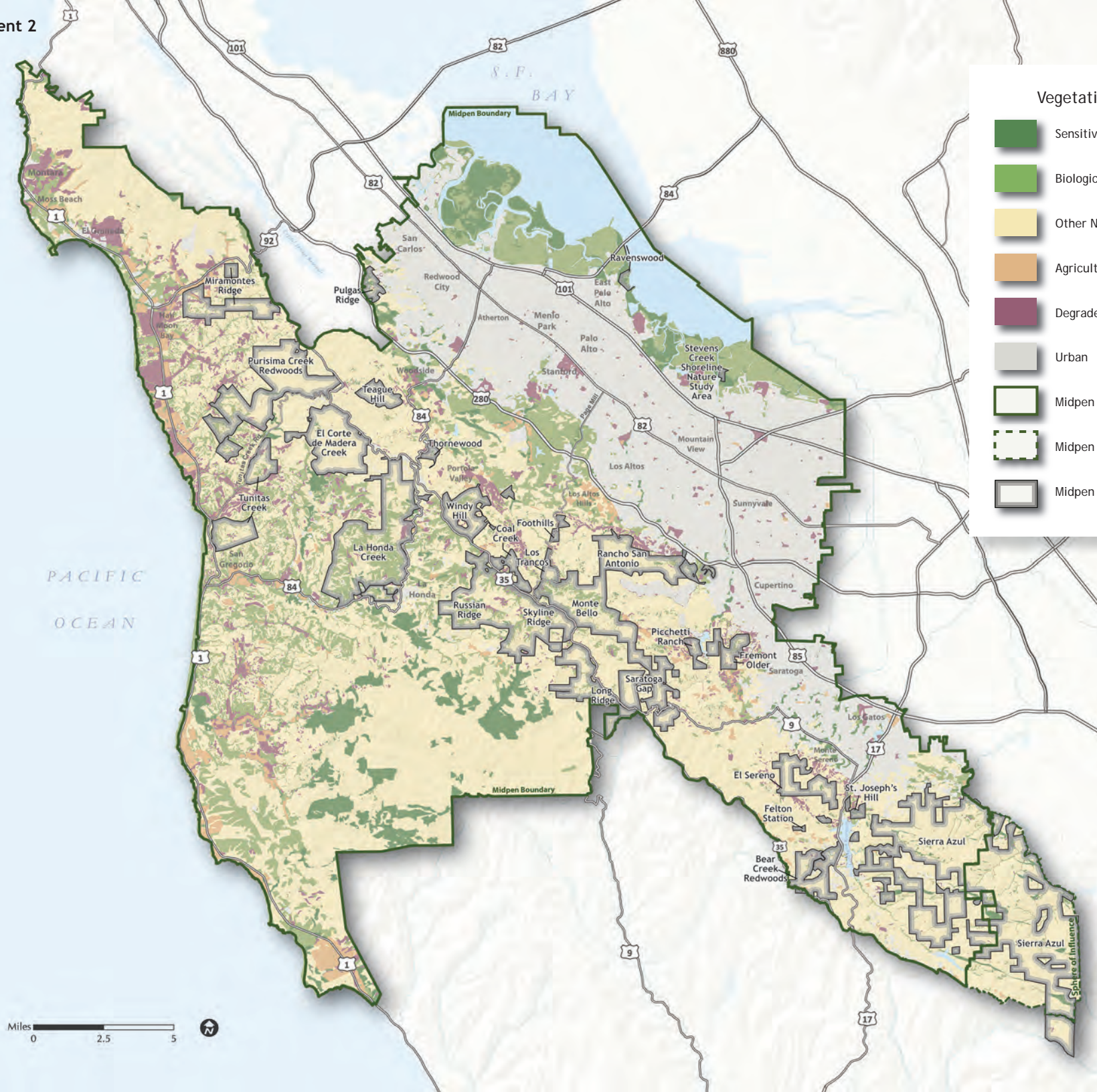
¹ <https://www.sacbee.com/news/california/fires/article216076320.html>

2. MROSD Sensitive Vegetation Map
3. MROSD Rare and Threatened Species Map
4. MROSD Habitat Linkages and Patches Map
5. High Resource Areas and Wildland-Urban Interface Map (MROSD)

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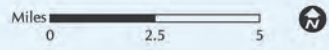
MROSD Board of Directors
Honorable Senator Jerry Hill
Honorable Senator Jim Beall
Honorable Assemblymember Marc Berman
Honorable Assemblymember Kevin Mullin
Honorable Assemblymember Mark Stone
Santa Clara County Board of Supervisors
San Mateo County Board of Supervisors

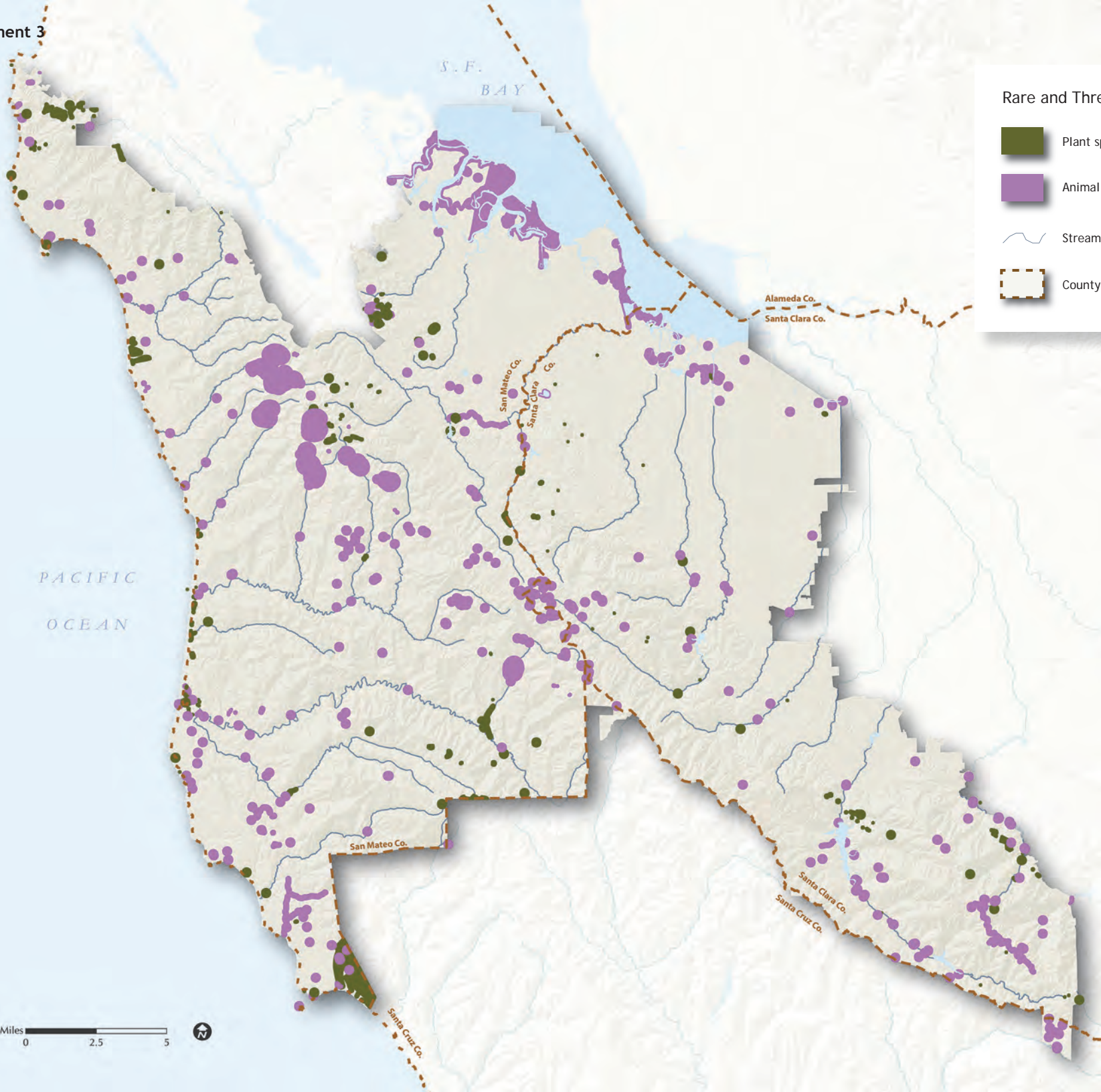




Vegetation Types

- Sensitive
- Biologically Highly Significant
- Other Native Communities
- Agriculture
- Degraded/Non-Native
- Urban
- Midpen Boundary
- Midpen Sphere of Influence
- Midpen Open Space Preserves

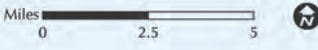
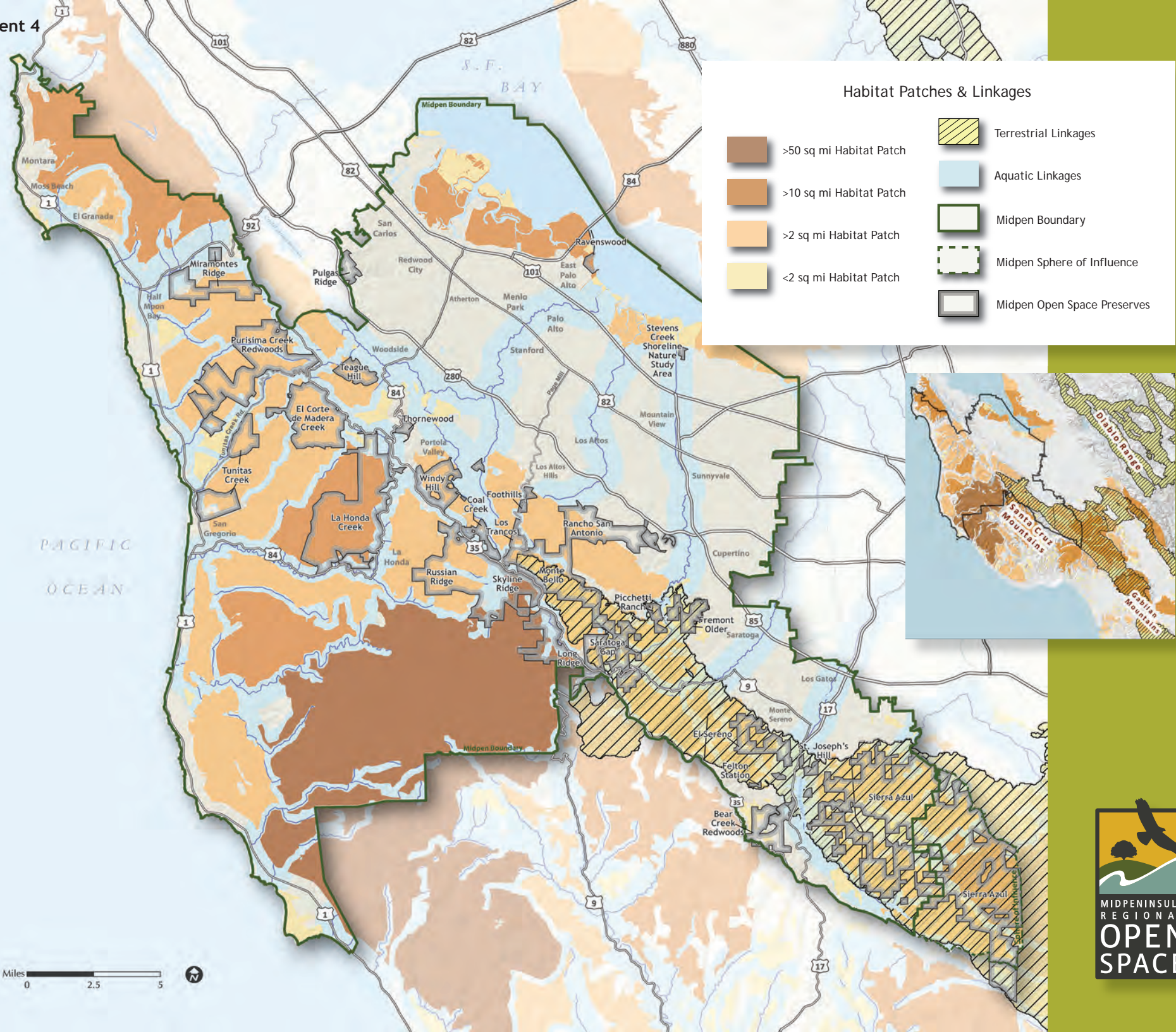




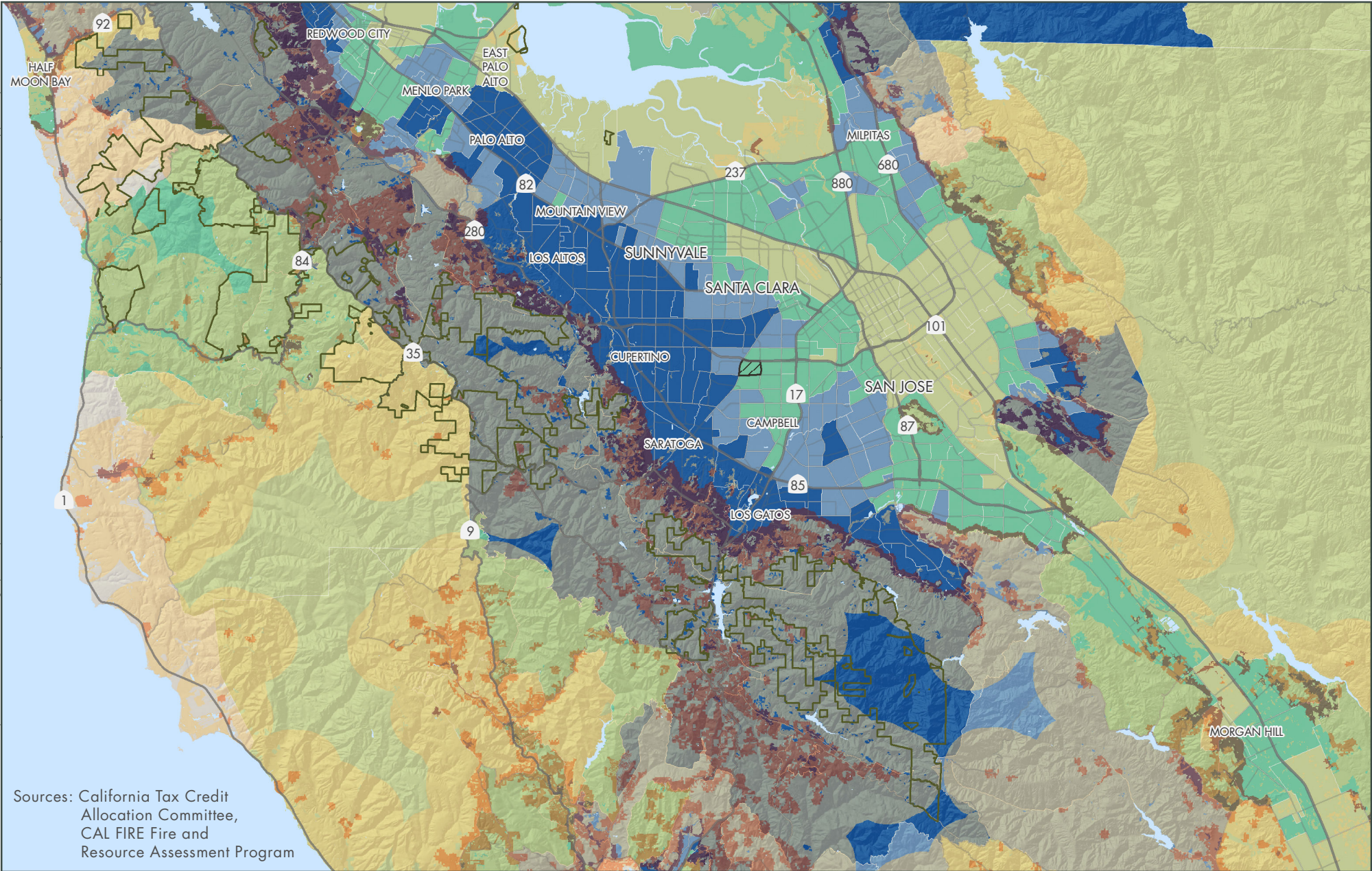
Rare and Threatened Species

- Plant species
- Animal Species
- Streams
- County Boundary
















Path: G:\Projects\A_DistrictWide\DemographicMaps\2018_AmericanCommunitySurvey\TCAC_HCD_OpportunityMap\TCAC_HCD_Opportunity_20201009.mxd



Sources: California Tax Credit Allocation Committee, CAL FIRE Fire and Resource Assessment Program

TCAC/HCD Opportunity Areas

- | | | |
|--------------------|---|--|
| Opportunity |  Highest resource |  Low resource |
| |  High resource |  High segregation & poverty |
| |  Moderate, resource (rapidly changing) |  Missing or insufficient data |
| |  Moderate resource | |

- FRAP WUI**
-  Midpen preserves
 -  Influence zone
 -  Intermix
 -  Interface

Midpeninsula Regional Open Space District
(Midpen)
10/9/2020



Created By: ngreig

While the District strives to use the best available digital data, these data do not represent a legal survey and are merely a graphic illustration of geographic features.