



OFFICE OF THE CITY MANAGER

250 Hamilton Avenue, 7th Floor
Palo Alto, CA 94301
650.329.2392

August 26, 2020

Housing Methodology Committee Members
Submitted Via Email To: info@bayareametro.gov

RE: Preferred Methodology for 6th Cycle RHNA

Dear Committee Members,

Thank you for your work and consideration of Palo Alto's August 11, 2020 comment letter.

The City of Palo Alto continues to advocate for the 2019 Household as baseline allocation for the RHNA methodology using an income shift up to 150%.

On August 13th the Housing Methodology Committee (HMC) indicated its preference for an alternative Future Year 2050 Households approach. This concept incorporates future household growth over 30 years in reliance on aspirational policy and financial commitments that cannot be assured and could take decades to implement, if endorsed.

This alternative disproportionately burdens some jurisdictions on the peninsula and south bay with housing growth targets that are unrealistic and will not be achieved despite local jurisdiction efforts to produce housing. Accordingly, despite our shared efforts, the region will again fall short of its housing goals.

If the Future Year 2050 Household baseline is formally recommended to the Executive Board, this alternative must include a cap that establishes a minimum and maximum percent change to a jurisdiction's increase in housing units. Establishing a reasonable threshold would ensure housing units are more fairly distributed throughout the region and likely produce more housing units.

The City of Palo Alto is also deeply concerned about process irregularities associated with the HMC meetings and the lack of time afforded to committee members and the public to absorb and make informed comments on new analysis and data presented only days before scheduled meetings. The rapid schedule, complexity of the information and questionable agenda postings undermine a sincere desire for participation and robs the HMC committee members of their stewardship responsibilities and jeopardizes public legitimacy.



As no formal action has been taken on the methodology baseline, the City of Palo Alto requests reconsideration of the 2019 Household approach or incorporation of reasonable threshold limits with the Future Year 2050 Household alternative baseline.

Thank you for your continued consideration.



Ed Shikada
City Manager

CC:

Palo Alto City Council Members

ABAG Executive Board Members

Molly Stump, City Attorney, City of Palo Alto

Jonathan Lait, Director, Planning and Development Services Department, City of Palo Alto

ABAG Regional Housing Needs Allocation Staff, RHNA@bayareametro.gov

Fred Castro, Clerk of the Board, Association of Bay Area Governments,

fcastro@bayareametro.gov

rhna@TheCivicEdge.com