September 29, 2020

Therese McMillan, Executive Director
Matt Maloney, Director of Regional Planning
MTC/ABAG Regional Planning Committee Members
375 Beale Street, Suite 800
San Francisco, CA 94105-2066

RE: Housing Methodology Committee recommendation – comments and concerns

Dear Ms. McMillan, Mr. Maloney and Members of the Regional Planning Committee:

First, we want to express our gratitude to the entire HMC and ABAG/MTC staff and consultants for supporting this monumental effort. Further the Planning and Community Development Directors and SCTA staff wish to specifically acknowledge the dedication of Gillian Adams, Dave Vautin, Paul Fassinger, Ada Chan, Aksel Olsen, Eli Kaplan and all of the other individuals whom have worked so diligently to support the HMC. We recognize their hard work and appreciate their continued and direct assistance to our jurisdictions.

At its September 18, 2020 meeting, the HMC voted to utilize the draft Plan Bay Area 2050 Blueprint's projected 2050 household data as the baseline in establishing the 6th cycle Regional Housing Need Allocations (RHNA) for Bay Area communities. Because the Draft Plan Bay Area (PBA) Blueprint provides similar guiding principles (https://www.planbayarea.org/2050-plan/plan-bay-area-2050-blueprint) as those adopted by the HMC, this seems a strategic and logical approach that would move the Bay Area toward these guiding principles. However, this assumes the underlying data and assumptions in the 2050 Blueprint model are accurate and comprehensive. In practice, North Bay communities are realizing, ***the implications of using a 30-year projection to establish an 8-year RHNA are significant and may have unintended consequences, especially for our rural communities and areas of unincorporated counties.*** Given this, if the draft PBA is to form the baseline for the RHNA allocation, then it is critical that:

1) The data input and development assumptions used to predict how land will develop must be accurate and account for existing real-world constraints; and

2) The growth assumptions must account for the two very different time frames (8 years vs. 30 years) and appropriately account for (but not over emphasize), the widespread economic crisis caused by the COVID-19 pandemic.

To ensure proper accounting for these issues, the Sonoma County Community Development Directors, Planning Directors and SCTA planners have repeatedly requested the data and the development assumptions that ABAG/MTC is utilizing for its modeling. Unfortunately, we have yet to receive the development assumptions, and only received the GIS (layer) zoning assumptions on Friday, September 25. Despite the delay in providing the requested data, ABAG staff has requested our communities each report back on any errors in this data by Wednesday, September 30, effectively providing our staff less than 3 working days to examine GIS data that

took years to build and to identify its errors. As identified below, a few hours spent examining this data has already revealed significant errors that appear to be erroneously inflating populations and projections in the unincorporated county and in some rural cities. ***Additional time is needed for the comprehensive data and assumptions used in the draft PBA Blueprint to be provided by AGAB/MTC staff, and to be truth-tested to ensure proper accounting for our unique community constraints. This need for additional time is only compounded by the tragic impacts of the Shady and Glass fires currently ravaging our communities.***

Data errors identified by Sonoma County jurisdictions

Without having the requested GIS layers from PBA available to check for errors, local staff have resorted to using the static .pdf graphic provided to each jurisdiction by ABAG. These .pdf maps are not interactive and do not provide any wayfinding information such as streets and roads to assist with orienting and ensuring accuracy with the review. Nonetheless, North Bay staff toiled to make side-by-side comparisons with our own GIS maps and have identified several significant errors.

Specifically, high-density housing assumptions are made in the PBA 2050 data in the following areas, either erroneously or in violation of RHNA objectives:

- In graveyards
- In floodways
- On rural recreational lands many miles from any services (at least 20 instances in unincorporated county)
- Adjacent to freeways with high pollution emission rates
- In industrially designated areas adjacent to noxious land uses
- In areas identified and certified as Priority Production Areas by ABAG/MTC
- Increased densities adjacent to high wildfire areas

In several unincorporated areas, the shape files for high-density housing do not have any relationship to parcel boundaries, roads or zoning districts; rather they appear to have been included randomly. There are clearly a large number of mapping errors that need to be corrected based on existing and known constraints (such as those listed above). If such significant errors were found in only a few hours and using information provided in a limited format, it calls into question the accuracy of the growth projections of the entire model.

While ABAG staff did contact local jurisdictions to ask them to review their data a year ago, the data was provided only as a spreadsheet with hundreds or thousands of data entries and no mapping or development assumptions being given. As such, this format did not result in a true "project referral" or productive engagement as the results clearly identify. Now that the maps have been included and staff can visually check for errors, the Directors and SCTA staff ***request a review period of three weeks following receipt of the requested data and development assumptions from ABAG staff, to review and identify errors in mapping and development assumptions. Further, this feedback needs to be meaningfully incorporated into the data and modeling projections before the RHNA baseline is set and growth is allocated.***

Infrastructure Constraints and Sites Requirements

All Sonoma County jurisdictions are concerned about the assumptions made in the draft PBA related to infrastructure. The resulting development assumptions (which we still have not received) made in the 30-year 2050 PBA timeline do not translate well into the 6th cycle RHNA planning period of 8 years. The use of PBA 2050 development assumptions and 25-year growth projections, which do not account for the 8-year RHNA timeline, deliver obscenely high numbers to unincorporated and rural communities which currently lack the infrastructure to serve the projected high-density growth. It is important to note that HCD is legislatively prohibited from allowing jurisdictions to "count" sites that will not be available for development within the 8-year housing element period. The end result is that jurisdictions allocated obscenely high numbers of growth without the means to develop the infrastructure needed to support such growth, will never be able to identify adequate sites to meet the statutory sites criteria and thus will not be able to achieve certification of their housing elements. Because grant funding for housing now requires a certified housing element, the use of the PBA assumptions will preclude these jurisdictions from receiving any funding to support housing development. ***The Directors and SCTA staff request that such areas identified for growth in the draft PBA 2050 Blueprint NOT be included in a jurisdiction's RHNA allocation for the 6th cycle unless infrastructure can be provided within the 8-year timeframe of the planning cycle. Setting these jurisdictions up for Housing Element failure is not good planning policy and will not result in housing being built.***

Environmental Justice, Climate Change and Covid-19 Related Issues

The chosen allocation methodology must meet the six statutory objectives of RHNA, including affirmatively furthering fair housing. This means that the RHNA allocation must take ***meaningful action to overcome patterns of segregation*** and to ***replace segregated living patterns*** with integrated and balanced communities. Unfortunately, mapping done for the PBA 2020 Blueprint reflects a perpetuation of segregated housing patterns by placing higher-density housing allocations to environmentally inferior areas that are already home to the region's poorest populations by virtue of having the lowest land costs. This, in turn, causes the RHNA allocation methodology to fail to meet the 5th statutory objective of RHNA. ***If the draft PBA 2050 Blueprint is to be used as a baseline for the RHNA allocation, the PBA data and projections must also be corrected to meet the six statutory objectives of RHNA, including to remove assumed high-density housing developments from areas that are environmentally inferior such as in flood zones, in polluted areas, adjacent to freeways, within industrial areas with high emissions and in high wildfire areas.***

Additionally, the specific development assumptions for PBA2050 should be made available for comment by the public, and then discussed by the Regional Planning Committee (RPC), HMC and ABAG Executive Board. For instance, it is our understanding that future sea level rise (e.g. current and future flood plain areas) is included as a development constraint for coastal areas, but neither current nor future FEMA regulatory flood plain areas outside of coastal communities are being included. This is not good planning and is an inconsistent approach to identifying and applying the development constraints of climate change, across all Bay Area communities. This is yet another example of why the underlying data and assumptions must be made available, so that local planners can assist ABAG/MTC staff in identifying and correcting these types of issues using our collective localize

knowledge of the issues we understand as lead agencies. Similarly, the additional adjustments to the development constraints and assumptions resulting from the Covid-19 pandemic (such as telecommuting assumptions) should also be provided to the public for discussion by the RPC, HMC and ABAG Executive Board.

In summary, while the choice to use PBA 2050 data as the baseline for RHNA allocations makes sense and can achieve good planning policy (such as thoughtful planning for development in high hazard areas), the use of this data must include means to separate the 8-year RHNA cycle from the 25-year growth model horizons. Without an effective accounting for constraints and allowance for needed corrections, the resulting growth projections will not meet the statutory objectives of RHNA and will counter-productively preclude jurisdictions from achieving Housing Element certification. Ultimately, this lack of statutory conformance and reduction in housing grant funding will result in less homes being built overall, and for the homes that are built perpetuating the discriminatory policies that have created the issues we are now trying to solve. Please take these comments under serious consideration and take utilize the feedback provided to improve the PBA 2050 modeling.

Thank you,

Sonoma County Planning and Community Development Directors

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