



Community Development Department

Association of Bay Area Governments (ABAG)
Metropolitan Transportation Commission (MTC)
Housing Methodology Committee (HMC)
375 Beale Street, Suite 800
San Francisco, California 94105

Re: Regional Housing Needs Assessment (RHNA) Allocation Process

HMC Members & ABAG/MTC Staff,

Thank you for the opportunity to participate in the ABAG/MTC RHNA HMC process. It has been an honor to participate with you all and to witness the dedication and commitment of the local planning community to address our housing challenges as a region. The North Bay provides unique benefits and amenities to the San Francisco Bay Area and as such, the Sonoma County delegation wishes to share the following perspective on the process and eventual outcome of the work of the HMC.

All of the cities in Sonoma County have significant concerns with using the Plan Bay Area Blueprint as the baseline data supporting the RHNA allocation process, and feel it would be a step backward from the smart, city centered, transit oriented growth policies and patterns regionally championed for decades. This is evidenced by the data in Appendix 2, of Item 5A on the August 28, 2020, HMC Agenda. Under the base line, communities such as Oakley, Brentwood, Napa, Morgan Hill, Gilroy, all of the Sonoma County communities and every unincorporated Bay Area County jurisdiction (most of which are far from urban amenities and job centers), are being allocated a RHNA which would push exponential growth in these communities. This fault is compounded by many of the urban job centers (such as San Francisco, Palo Alto and Santa Clara) and their wealthy enclaves (such as Las Altos Hills and Woodside) receiving some of the lowest allocations (by-percentage). How does using this model as a "baseline" represent good planning and a sustainable model for growth when it would clearly perpetuate sprawl and lack of access to transit and jobs?

Further, using the 2050 Blueprint as a baseline also appears to "frontload" long-range growth strategies, unrealistically allocating a large proportion of a community's total build-out into the 8 year RHNA cycle (instead of over the 30-year time frame of Plan). This results in RHNA allocations that are completely unreachable and does not allow for smart, planned, growth over the long-range planning horizon (case in point: rural Solano County would have a RHNA allocation that required a growth of 41%; and Sebastopol would have an allocation in excess of the General Plan build-out for its city limits). Further, use of the Plan does not seem to consider

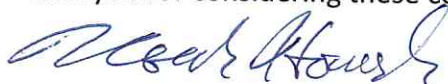
transit or infrastructure limitations of many of these communities, to say nothing of the natural hazards we have recently (and are currently) experienced.

All of this said it is recognized that there is no perfect methodology, and any effort to allocate our regional growth will create winners and losers. Early in the HMC process with ABAG/MTC, HMC members discussed the merits of various approaches to allocating the RHNA to all jurisdictions in the Bay Area. The primary concerns voiced by a vast majority of HMC members during these early discussions included ensuring “high resource” areas construct an increased number of housing units to serve lower income individuals and families; ensuring significant displacement of existing lower income communities (gentrification) be avoided; and providing a methodology to allocate a significant number of the region’s housing units in close proximity to transit services (to minimize the pressures and impacts of urban sprawl). Several resulting scenarios were then voted upon by the HMC with three allocation scenarios clearly receiving the top number of votes; the Bottom-Up Approach, Income Shift Approach and the Income Crescent Approach. Unfortunately, the pressure to utilize the 2050 Blueprint seems to have pushed these primary goals away from the forefront of the conversation. These foundational elements need to be brought back into the allocation methodology discussion as the HMC begins to settle onto a chosen course.

Based on this perspective (notwithstanding the above voiced concerns) and with an understanding that the HMC and ABAG/MTC staff have conceptually supported moving in the direction of the 2050 Households Blueprint data as a baseline, the Sonoma County communities support the use of Option 2A identified in Appendix 2 (of the attachments) as the best allocation factors to apply. This seems to provide the broadest “spread” of allocations across our communities and takes a “best for most” approach to allocating our growth. Further, this combination seems to most directly implement the voiced goals of the HMC, namely by reducing the number of units proposed in the far reaching cities and un-incorporated areas of the Bay Area; by continuing city-centered growth, locating a greater share of housing units in urban, job rich areas; and by pushing some of our “high resource” communities to increase their housing production to expand access to their resources.

This is a complex and challenging process to undertake, and I ask that all of the members focus on the stated goals identified by a majority of the HMC early in our deliberations. By keeping these concepts and intentions in the forefront of our process, any extraneous information or factors that are brought into the discussion can be addressed and managed with clear intent.

Thank you for considering these comments and perspective on our RHNA allocation process.



Noah Housh
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City of Cotati
Sonoma County HMA Delegate