



September 16, 2020

Mayor Jesse Arreguín, President
ABAG Executive Board
Association of Bay Area Governments
375 Beale Street, Suite 700
San Francisco, CA 94105-2066

Dear President Arreguín:

Our council wishes to convey our tremendous appreciation for the Housing Methodology Committee’s (HMC) work on the formidable task of evaluating housing allocation methodologies for the next Regional Housing Needs Allocation (RHNA) cycle (2023-2031). We appreciate the HMC’s consideration of our input to date and utilizing the “Plan Bay Area 2050” as the baseline data methodology.

We understand that the HMC is now considering options (a combination of different “factors”) that would refine the housing allocation methodology. To this end, we are writing to express grave concern that the options proposed for consideration - **Option 5A** (“High Opportunity Areas & Jobs”) and **Option 6A** (“Modified High Opportunity Areas Emphasis”) - are **rife with unintended consequences**. Specifically:

1. These methodologies allocate housing growth to “high opportunity areas” (suburban communities) rather than to urbanized city centers with a wealth of transit options and high-quality jobs. Doing so would **exacerbate the jobs/housing imbalance**:

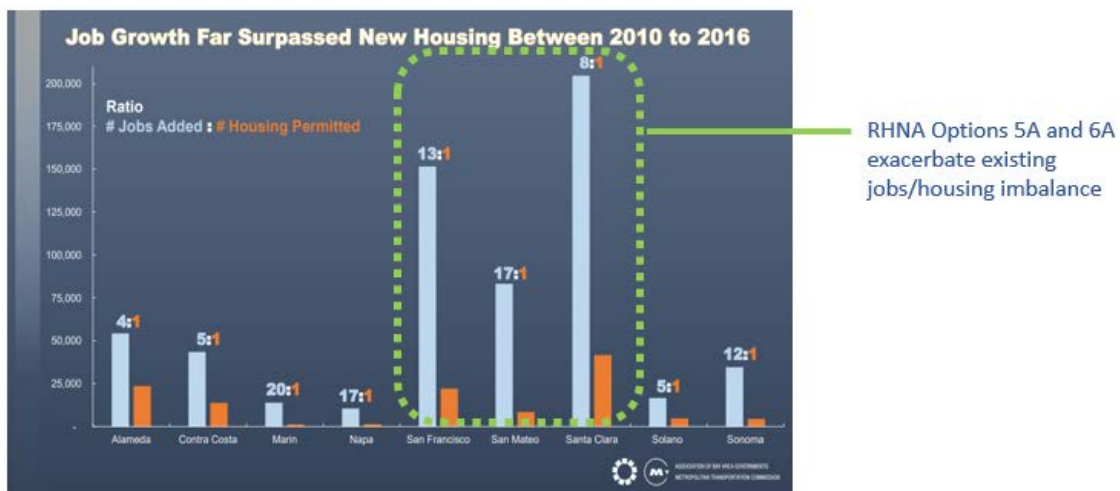


Figure 1. Existing Jobs/Housing Imbalance (source: ABAG)

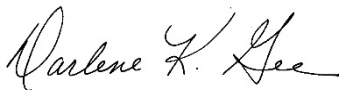
2. Allocating housing growth to suburban communities **ignores market demand** for housing in urbanized city centers with high-quality jobs. If the collective goal is to facilitate housing construction, then we strongly advocate for housing to be allocated where there is market demand.
3. Allocating housing growth communities at that interface with urban growth boundaries and green fields would **place development pressures on undeveloped agricultural lands**. It would be *contrary* to the prioritizing in-fill development, avoiding areas with natural hazards, and **promotes urban sprawl**.
4. Lastly, allocating growth farther from quality job centers and **exacerbates the staggering commutes on workers**, placing an undue burden on working families and in many cases, increasing Vehicle Miles Traveled (VMT) in the region.

In summary, the City of Orinda recognizes the critical need to address a statewide housing affordability crisis and the responsibility of local cities to help address this issue that is critical to the quality of life for all residents. We believe in – and urge the Executive Board to consider - factors that:

- a. **Allocate housing growth near job centers** (i.e., achieve a greater balance between the “jobs” and “housing” bars in the graphic on page 1). This reduces long commutes and allows development of a strong social/community fabric.
- b. **Discourage housing growth near green fields and protected open space**, reducing development pressure at the urban growth boundaries.
- c. **Discourage housing growth in small and rural communities** with limited land capacity, to avoid driving up land development costs and building near natural hazards.

With tremendous appreciation for your work, we thank you for your consideration.

Sincerely,



Darlene Gee
Mayor, City of Orinda