



October 14, 2020

Mr. 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 – Concerns About Recommended Methodology

Dear Director Arreguin,

TOGETHER Bay Area is a coalition of 65 public agencies, Indigenous Tribes, and nonprofits working in the San Francisco Bay Area for climate resilience and social equity. We write today to provide feedback on the Regional Housing Needs Allocation (RHNA) 6 housing methodology recommended by the ABAG Housing Methodology Committee – Option 8A.

Since its first adoption in 2013, Plan Bay Area has served as the urban growth blueprint for the Bay Area, which focuses regional growth around transportation infrastructure through its Priority Development Area (PDA) program, and strives to provide equitable outcomes to all Bay Area residents. The Priority Conservation Area (PCA) program has created avenues to enhance regionally significant natural landscapes, public access, and habitats surrounding the built environment, and to provide respite for the densifying PDAs. The vision set out by Plan Bay Area is one that seeks balance between growth in the built environment and sound stewardship of the vital resources provided by our natural and working lands, such as clean air, clean water, food, and access to nature.

TOGETHER Bay Area strongly supports statewide objectives to address the housing crisis we face in California by significantly increasing the amount of available housing, especially affordable housing. We also strongly support statewide strategies to promote urban infill, support climate smart transportation initiatives, and to leverage nature-based solutions to climate threats, which are solutions that typically provide multiple benefits to communities, such as increased livability, more equitable access to nature, and improved habitat for wildlife, water, and food production. We support continued evaluation of housing needs and further refinement of Plan Bay Area to better meet SB 375 (Steinberg, 2009) goals. **However, we see within the housing allocation methodology currently being recommended by the Housing Methodology Committee, an enormous increase of housing allocations to unincorporated counties, which will inevitably pressure local governments and cities into zoning lands that are inappropriate for housing in order to meet those thresholds.**

For example, in unincorporated Santa Clara County alone, the allocation of housing units increased from 277 units in RHNA 5 to 4,137 for RHNA 6, representing a nearly 1,400 percent increase. Other unincorporated counties are projecting similar drastic increases through the proposed methodology. **We are very concerned that such high allocations for unincorporated areas, which are primarily rural, agricultural, or open space, will significantly increase pressure to zone for housing in areas at high risk for fire, over PCAs, on productive agricultural lands, or proximate to critical habitat linkages.**

Further, the goal of Plan Bay Area, per SB 375, is to reduce greenhouse gas emissions by focusing housing near jobs and transit. The allocation of significant increases in housing units to the unincorporated (rural) counties accelerates sprawl, which is exactly counter to the strategic goals Plan Bay Area is trying to achieve. **Housing allocations must be consistent with the intent to stop greenfield development, and instead practice smart growth strategies that apply infill construction within the existing urban footprint of our communities.**

Importantly, with the latest megafires serving as a backdrop, the potential for wildland fire embers to be carried by winds for miles into the built environment is well-documented. Homes in and near the wildland-urban interface (the WUI) are at particular risk if adequate defensible spaces and home hardening measures have not been taken (please see Attachment 2). **Increased, concentrated development in the WUI, incentivized by the pressure of high RHNA allocations to unincorporated areas, does not follow best practices in mitigating the threat of catastrophic wildfire that risks lives and property.** A 2017 insurance analysis shows that almost 350,000 homes in the Bay Area are in areas at high or extreme risk of wildfire already.¹ We must avoid exacerbating this deadly problem by unintentionally spurring development in the WUI.

For all of the reasons stated, we recommend that the housing methodology considered for adoption by the ABAG Executive Board be modified so that it is consistent with climate goals and strategies within Plan Bay Area, and with climate goals of our local jurisdictions and the State of California.

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

Sincerely,

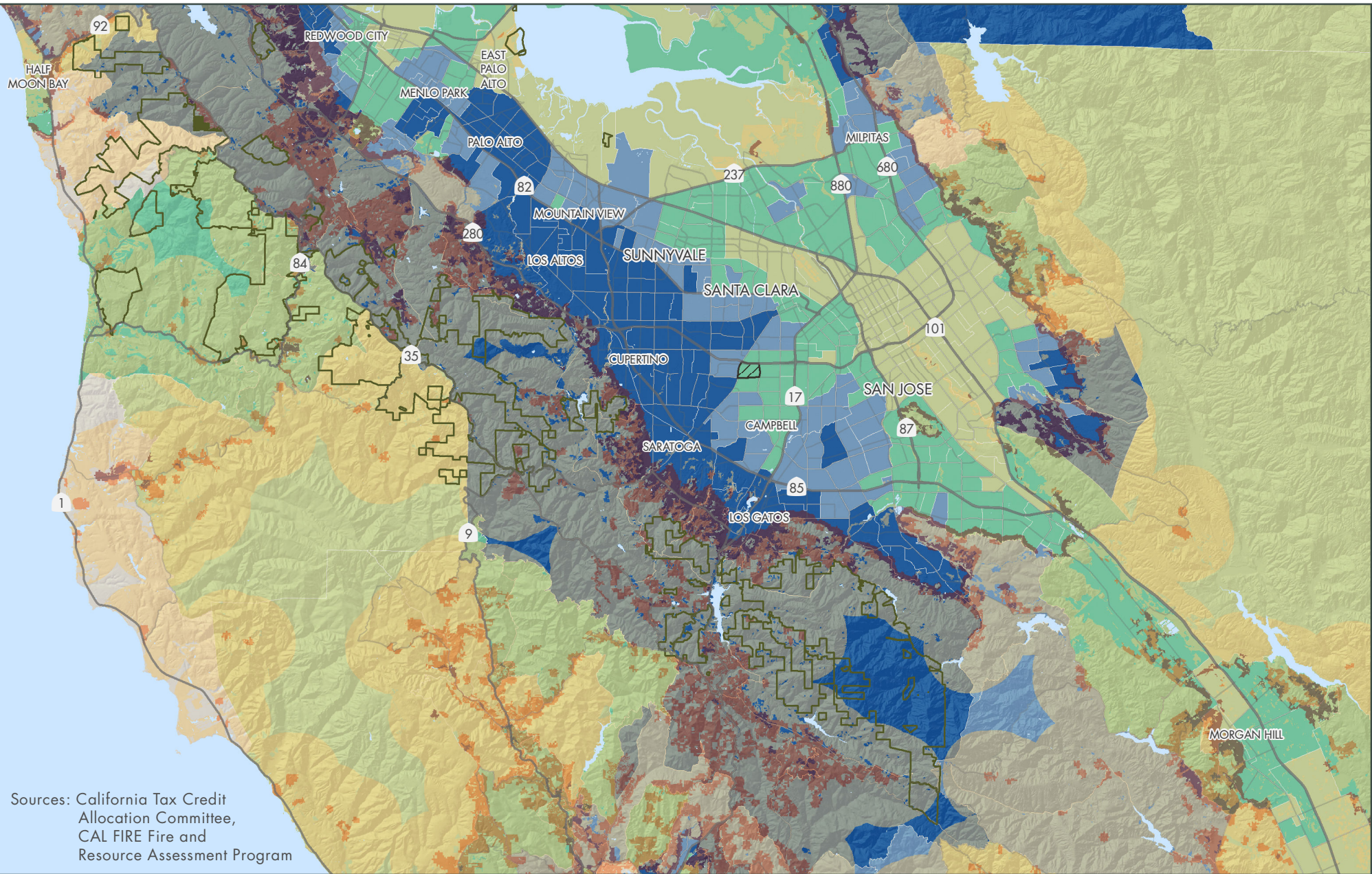


Annie Burke
Executive Director

Attachments:

1. HCD/TCAC High Opportunity Areas and Wildland-Urban Interface Map (MROSD)
2. Bay Area PCA Map (ABAG)





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



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

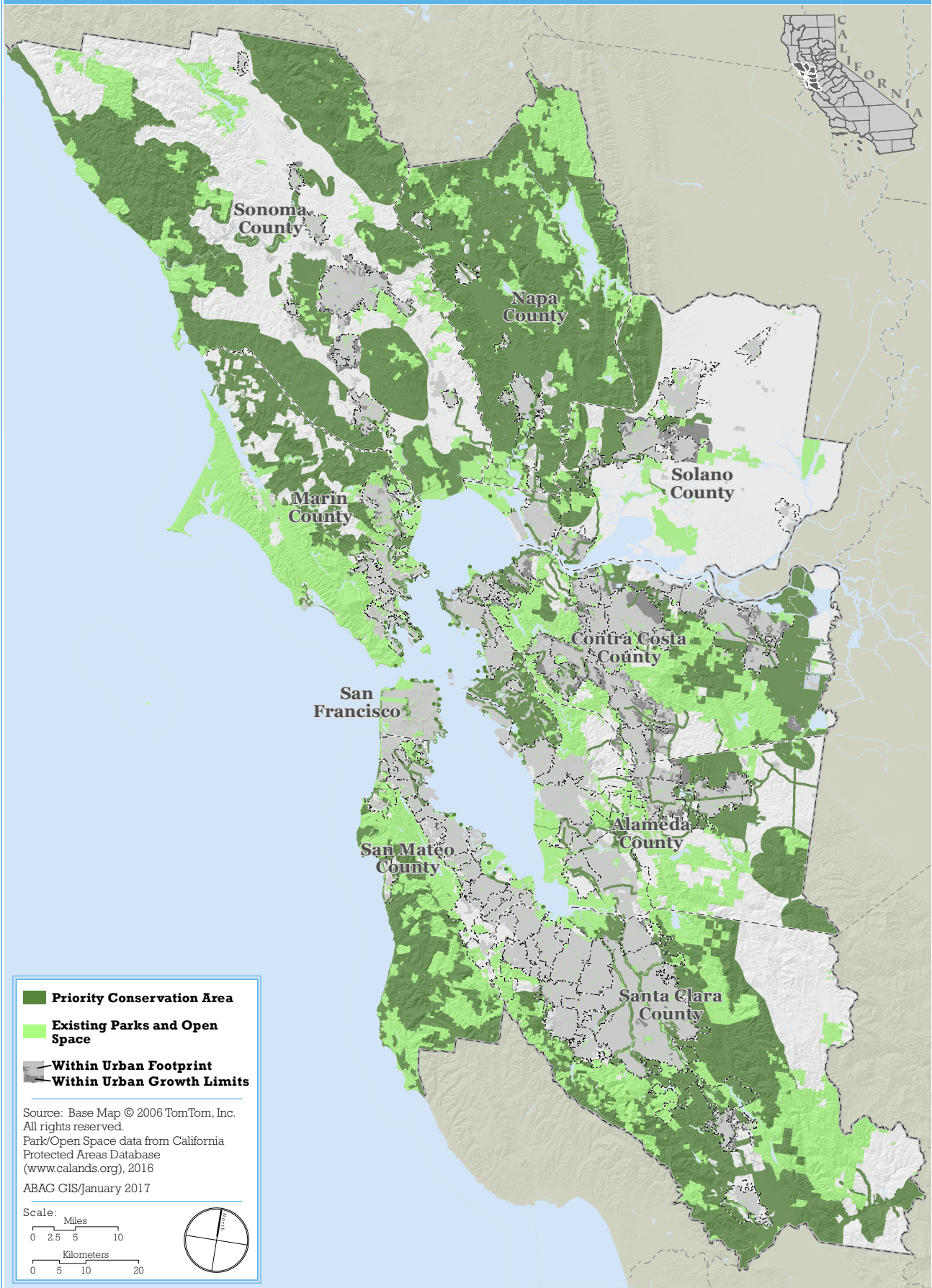
TCAC/HCD Opportunity Areas

- | | | |
|--------------------|---|--|
| 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





Source: Base Map © 2006 TomTom, Inc. All rights reserved.
Park/Open Space data from California Protected Areas Database (www.calands.org), 2016
ABAG GIS/January 2017

Scale:
Miles: 0 2.5 5 10
Kilometers: 0 5 10 20

Priority Conservation Areas - Potential for Expansion of Parks, Urban Greening, and Protected Open Space

