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TRANSMITTED VIA EMAIL

October 13, 2016

Jim Spering, Chair, MTC Planning Committee  
Julie Pierce, President, Association of Bay Area Governments  
Bay Area Metro Center  
375 Beale Street,  
San Francisco, CA 94105

Dear Chairs Spering and Pierce,

### Re: **SV@Home Comments on Plan Bay Area's 2040 Preferred Scenario**

Every day as we travel around Santa Clara County and to other parts of the Bay Area, we are constantly reminded of the jobs housing imbalance. Area freeways and roads are more and more crowded and the time to get from point A to point B is taking longer and longer.

This jobs housing imbalance has three causes-- the mismatch between the location of jobs and the location of homes (jobs housing balance), the mismatch between the cost of housing and worker wages (jobs-housing fit), and the addition of new jobs without consideration of where the new employees will live. If these causes are not addressed, our traffic congestion and our quality of life will continue to be negatively impacted.

While improvements to our transportation systems are one solution, there are several additional big picture solutions:

1. Further promote transit oriented residential development to make it easier to travel between housing and employment.
2. Ensure that areas that are housing poor and job rich have higher requirements for housing production, and that new job creation is matched by new housing development.
3. Provide funding and other incentives to ensure that the housing built is affordable to the people who work in the community.

Plan Bay Area, a collaborative undertaking by the Metropolitan Transportation Commission (MTC) and the Association of Bay Area Governments (ABAG), is the only region-wide effort that links local land use and transportation across the nine counties and 101 cities of the Bay Area. We appreciate that the process to develop a housing and transportation framework to implement Plan Bay Area is challenging and we commend you for your efforts and for your outreach. In particular, we thank MTC Planning Director, Ken Kirkey, for allowing us multiple opportunities to provide feedback on the draft Preferred Scenario.

We do, however, have serious concerns with the 2040 Preferred Draft Scenario. Many of SV@Home's concerns parallel those included in the letter from the Non Profit Housing Association of Northern California (see Attachment 3). We can't underscore enough the need to have a strong implementation plan that provides some teeth to Plan Bay Area. Our comments here respond to issues that are specific to Santa Clara County.

**The Urban Sims model housing projections are inconsistent with current Regional Housing Needs Allocation (RHNA) requirements.** For example, Los Gatos' projected housing growth amounts to 17 new homes per year, far less than the 77 homes required under the current RHNA period. In fact, Los Gatos' housing requirement under the plan for a 24-year period is lower than their current eight-year RHNA goal. All communities except for Gilroy, Mountain View, San Jose, and Sunnyvale would have a lower housing requirement than RHNA now requires. See Table 1, provided as an attachment, for more detail.

**In some cases, housing projections are lower than housing plans currently approved or being considered by local jurisdictions.** The Preferred Scenario's household projections fall below household projections established by local general plans for many communities in Santa Clara County. For example, the Preferred Scenario projects 30,800 households in Milpitas by 2040, when the City's General Plan plans for 31,680 households during the same period. The City of Palo Alto is now considering a plan that would create more new housing units than the number required under the Preferred Scenario.

**The Preferred Scenario will exacerbate the existing imbalance between jobs and housing in Santa Clara County.** The Preferred Scenario reinforces the current practice of providing far too few homes for the number of jobs being created in the County. Palo Alto, a community which currently has more than three jobs per employable resident it houses, is expected to have 8.15 new jobs for each new home it creates by 2040. Santa Clara, which currently has close to three jobs per employed resident, will have a ratio of 7:1 by 2040. See Table 1, provided as an attachment, for more detail.

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Julie Pierce, President, Association of Bay Area Governments  
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**The draft Preferred Scenario exacerbates the existing jobs-housing fit in the County.** The County and its 15 jurisdictions have a very poor job and housing fit (measured as ratio of low-wage jobs versus affordable homes). Table B (Attachment 2) shows how, while communities failed to shoulder their share of affordable housing need, many exceeded their market-rate housing requirements. As a result, communities like Cupertino and Los Altos have at least 14 and 11 low-wage workers competing for EACH affordable home, respectively.

We urge the Joint Commission and staff to consider these concerns to ensure that Plan Bay Area does not inadvertently endanger efforts to strike a more equitable balance between jobs and housing across Santa Clara County communities.

Sincerely,



Pilar Lorenzana-Campo  
Policy Director

CC:

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Table 1: Plan Bay Area 2040 Draft Preferred Scenario (August 30, 2016)

| Jurisdiction        | Households       |             |      |                      | Jobs             |             |      |                      | jobs per household |                      | new households per year |                |
|---------------------|------------------|-------------|------|----------------------|------------------|-------------|------|----------------------|--------------------|----------------------|-------------------------|----------------|
|                     | 2010 assumptions | 2010 actual | %    | 2040 PBA projections | 2010 assumptions | 2010 actual | %    | 2040 PBA projections | 2010 actual        | 2040 PBA projections | 2040 PBA projections    | 2015-2022 RHNA |
| Campbell *          | 16,550           | 16,950      | 102% | 18,950               | 25,200           | 27,320      | 108% | 31,800               | 1.61               | 2.75                 | 80                      | 117            |
| Cupertino           | 20,900           | 20,181      | 97%  | 24,450               | 26,800           | 26,090      | 97%  | 53,100               | 1.29               | 7.41                 | 118                     | 133            |
| Gilroy              | 14,000           | 14,175      | 101% | 19,600               | 17,850           | 17,650      | 99%  | 20,800               | 1.25               | 0.53                 | 187                     | 136            |
| Los Altos           | 10,500           | 10,745      | 102% | 12,000               | 14,050           | 14,760      | 105% | 16,750               | 1.37               | 1.80                 | 50                      | 60             |
| Los Altos Hills *   | 2,850            | 2,829       | 99%  | 3,050                | 1,550            | 2,060       | 133% | 1,750                | 0.73               | 1.00                 | 7                       | 15             |
| Los Gatos *         | 11,900           | 12,355      | 104% | 12,400               | 19,000           | 23,630      | 124% | 21,250               | 1.91               | 4.50                 | 17                      | 77             |
| Milpitas *          | 19,000           | 19,184      | 101% | 30,800               | 42,000           | 45,190      | 108% | 56,400               | 2.36               | 1.22                 | 393                     | 411            |
| Monte Sereno *      | 1,250            | 1,211       | 97%  | 1,350                | 550              | 450         | 82%  | 550                  | 1.21               | 0.00                 | 3                       | 8              |
| Morgan Hill *       | 12,550           | 12,326      | 98%  | 15,500               | 19,250           | 17,570      | 91%  | 20,700               | 1.43               | 0.49                 | 98                      | 116            |
| Mountain View       | 31,800           | 31,957      | 100% | 58,500               | 48,500           | 47,950      | 99%  | 69,600               | 1.50               | 0.79                 | 890                     | 366            |
| Palo Alto *         | 26,550           | 26,493      | 100% | 29,150               | 102,000          | 89,690      | 88%  | 123,200              | 3.39               | 8.15                 | 87                      | 249            |
| San Jose *          | 297,700          | 310,366     | 104% | 440,600              | 387,700          | 377,140     | 97%  | 502,600              | 1.25               | 0.80                 | 4,763                   | 4,385          |
| Santa Clara *       | 42,100           | 43,021      | 102% | 54,900               | 102,900          | 112,890     | 110% | 189,100              | 2.62               | 6.73                 | 427                     | 512            |
| Saratoga *          | 10,650           | 10,734      | 101% | 11,000               | 8,750            | 9,910       | 113% | 9,500                | 0.92               | 2.14                 | 12                      | 55             |
| Sunnyvale           | 52,600           | 53,384      | 101% | 80,700               | 65,800           | 74,810      | 114% | 116,000              | 1.40               | 1.79                 | 937                     | 682            |
| Unincorporated Area | 26,100           | 27,293      | 105% | 33,600               | 29,500           | 39,150      | 133% | 36,500               |                    | 0.93                 | 250                     | 35             |
| <b>TOTAL</b>        | <b>597,000</b>   |             |      | <b>846,550</b>       | <b>911,400</b>   |             |      | <b>1,269,600</b>     |                    | <b>1.44</b>          | <b>8,318</b>            |                |

Legend

- 2010 household growth that did not meet expectations
- 2010 job growth that exceeded projections
- Projected ratio that will likely exacerbate current jobs and housing imbalance
- PBA per year housing projections that are less than yearly RHNA requirement
- \* Communities with local plans that exceed housing projections



## 2007-2014 Regional Housing Needs Allocation (RHNA) Progress

| Jurisdiction    | Very Low Income<br>up to 50% ami |                   |       | Low Income<br>51% to 80% ami |                   |       | Moderate Income<br>81% to 120% ami |                   |       | Above Moderate Income<br>more than 120% ami |                   |       | Total  |                   |       |
|-----------------|----------------------------------|-------------------|-------|------------------------------|-------------------|-------|------------------------------------|-------------------|-------|---|-------------------|-------|--------|-------------------|-------|
|                 | RHNA                             | Permits<br>Issued | % Met | RHNA                         | Permits<br>Issued | % Met | RHNA                               | Permits<br>Issued | % Met | RHNA  | Permits<br>Issued | % Met | RHNA   | Permits<br>Issued | % Met |
| Campbell        | 199                              | 32                | 16%   | 122                          | 300               | 246%  | 158                                | 67                | 42%   | 413   | 217               | 53%   | 892    | 616               | 69%   |
| Cupertino       | 341                              | 38                | 11%   | 229                          | 31                | 14%   | 243                                | 58                | 24%   | 357   | 657               | 184%  | 1,170  | 784               | 67%   |
| Gilroy          | 319                              | 29                | 9%    | 217                          | 70                | 32%   | 271                                | 65                | 24%   | 808   | 1,262             | 156%  | 1,615  | 1,426             | 88%   |
| Los Altos       | 98                               | 23                | 23%   | 66                           | 22                | 33%   | 79                                 | 12                | 15%   | 74  | 784               | 1059% | 317    | 841               | 265%  |
| Los Altos Hills | 27                               | 25                | 93%   | 19                           | 10                | 53%   | 22                                 | 5                 | 23%   | 13  | 76                | 585%  | 81     | 116               | 143%  |
| Los Gatos       | 154                              | 2                 | 1%    | 100                          | 41                | 41%   | 122                                | 5                 | 4%    | 186   | 180               | 97%   | 562    | 228               | 41%   |
| Milpitas        | 689                              | 336               | 49%   | 421                          | 109               | 26%   | 441                                | 264               | 60%   | 936   | 6,442             | 688%  | 2,487  | 7,151             | 288%  |
| Monte Sereno    | 13                               | 6                 | 46%   | 9                            | 12                | 133%  | 11                                 | 3                 | 27%   | 8   | 14                | 175%  | 41     | 35                | 85%   |
| Morgan Hill     | 317                              | 98                | 31%   | 249                          | 100               | 40%   | 246                                | 43                | 17%   | 500   | 1,286             | 257%  | 1,312  | 1,527             | 116%  |
| Mountain View   | 571                              | 237               | 42%   | 388                          | 28                | 7%    | 488                                | 4                 | 1%    | 1,152                                       | 2,387             | 207%  | 2,599  | 2,656             | 102%  |
| Palo Alto (C)   | 690                              | 156               | 23%   | 543                          | 9                 | 2%    | 641                                | 128               | 20%   | 986   | 787               | 80%   | 2,860  | 1,080             | 38%   |
| San Jose (C)    | 7,751                            | 1,774             | 23%   | 5,322                        | 1,038             | 20%   | 6,198                              | 144               | 2%    | 15,450                                      | 13,073            | 85%   | 34,721 | 16,029            | 46%   |
| Santa Clara (C) | 1,293                            | 412               | 32%   | 914                          | 111               | 12%   | 1,002                              | 198               | 20%   | 2,664                                       | 5,952             | 223%  | 5,873  | 6,673             | 114%  |
| Saratoga        | 90                               | -                 | 0%    | 68                           | 13                | 19%   | 77                                 | 5                 | 6%    | 57  | 20                | 35%   | 292    | 38                | 13%   |
| Sunnyvale (C)   | 1,073                            | 572               | 53%   | 708                          | 402               | 57%   | 776                                | 1,204             | 155%  | 1,869                                       | 2,403             | 129%  | 4,426  | 4,581             | 104%  |
| SCC Unincorp.   | 253                              | 58                | 23%   | 192                          | 396               | 206%  | 232                                | 166               | 72%   | 413   | 422               | 102%  | 1,090  | 1,042             | 96%   |
| County Totals   | 13,878                           | 3,798             | 27%   | 9,567                        | 2,692             | 28%   | 11,007                             | 2,371             | 22%   | 25,886                                      | 35,962            | 139%  | 60,338 | 44,823            | 74%   |

Source: Association of Bay Area Governments, September 2015

## Jobs and Housing Fit (JHFit)

| LW<br>JHFit<br>Ratio<br>(2011) | LW<br>JHFit<br>Ratio<br>(2013) | LW<br>JHFit<br>Ratio<br>(2014) | J/H<br>Balance | % low<br>wage<br>jobs | %<br>affordab<br>le<br>homes |
|--------------------------------|--------------------------------|--------------------------------|----------------|-----------------------|------------------------------|
| 6.67                           | 8.31                           | 8.06                           | 1.60           | 22.7%                 | 6.2%                         |
| 11.89                          | 14.20                          | 14.05                          | 1.71           | 15.5%                 | 3.5%                         |
| 3.41                           | 4.32                           | 4.45                           | 1.09           | 31.9%                 | 10.6%                        |
| 12.21                          | 14.60                          | 19.13                          | 0.95           | 20.1%                 | 2.8%                         |
| 4.97                           | 7.39                           | 6.33                           | 0.67           | 14.2%                 | 4.6%                         |
| 10.62                          | 11.05                          | 11.22                          | 1.34           | 23.2%                 | 4.3%                         |
| 9.85                           | 9.82                           | 8.98                           | 2.18           | 19.3%                 | 7.9%                         |
| 6.93                           | 7.62                           | 5.95                           | 0.32           | 30.5%                 | 3.4%                         |
| 13.08                          | 11.32                          | 7.45                           | 1.04           | 23.4%                 | 8.0%                         |
| 4.03                           | 5.26                           | 6.04                           | 2.66           | 9.6%                  | 7.7%                         |
| 6.32                           | 6.82                           | 6.71                           | 3.83           | 10.4%                 | 7.3%                         |
| 3.98                           | 4.37                           | 4.45                           | 1.25           | 20.0%                 | 9.6%                         |
| 6.72                           | 8.39                           | 9.33                           | 2.38           | 12.8%                 | 4.5%                         |
| 3.50                           | 3.59                           | 5.14                           | 0.72           | 26.1%                 | 4.8%                         |
| 3.65                           | 4.69                           | 5.44                           | 1.58           | 10.9%                 | 8.7%                         |

Source: UC Davis Center for Regional Change, October 2016. See notes below

### Notes on Jobs and Housing Fit Data:

#### Data Sources:

Jobs data comes from the Longitudinal Employer Household Dynamics (LEHD) Origin-Destination Employment Statistics Dataset (LODES), Workplace Area Characteristics file, published by the U.S. Census and available for download here: <http://lehd.ces.census.gov/data/> It includes all employment covered by the Unemployment Insurance system, along with Federal Government employment. It excludes self-employed workers. Since its reference point is essentially jobs held on April 1st each year, it undercounts seasonal employment in other times of the year. Housing data is calculated from the American Community Survey, 5-year files, also published by the U.S. Census. The data was downloaded from DataFerrett: <http://dataferrett.census.gov/>

#### Definitions:

For the purposes of this analysis: *Low-wage jobs* are defined as those jobs with earnings of \$1250/month or less; *Affordable rental units* are defined as rental units with less than \$750/month rent; *Affordable Owned Units* are defined as those owner-occupied or vacant for sale housing units valued at less than \$150,000.

#### Methodology:

The definition for low-wage jobs of \$1250/month or less of earnings is pre-determined by the LODES dataset, which only reports on job earnings in three categories: earnings \$1250/month or less; earnings \$1251/month to \$3333/month; and earnings greater than \$3333/month. In determining housing affordability, it was important for us to develop a threshold that was based on a multiple of this \$1250 income threshold, rather than a measure of area median income (which is often used in affordable housing programs). This was because we want to be able to easily update the analysis on an annual basis and compare trends over time, and thus need a consistent measure of housing affordability that corresponds with the (unchanging) measure of low-wage jobs. \$750/month corresponds to the equivalent of 30% of household income if 2 income earners in a household were both earning \$1250/month. ( $\$750 * 2 * 30\% = \$750$ ). This is probably a generous estimate of affordability, since the average household in California has approximately 1.4 income earners. The threshold of \$150,000 for an affordable owned home is based on a calculation of monthly principal and interest payments on a 30-year 4% fixed-rate mortgage of \$120,000 (80% of home-value) plus an estimated 1.2% general property tax and municipal assessments rate, which comes to \$723/month. This assumption doesn't take into account additional insurance costs or potential tax savings, and doesn't address where a 20% down-payment for the home might come from. Given these limitations in an assumption of owned-home affordability, our focus is on affordable rental units. *It is important to note that 'affordable housing' in this context does not refer to subsidized or deed-restricted units, which is frequently the definition used in the affordable housing field. Rather it is a measure of actual rent based on all units, regardless of deed restrictions or eligibility for subsidy.*

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Friday, October 14, 2016

Jim Spering, Chair, MTC Planning Committee  
Julie Pierce, President, Association of Bay Area Governments  
Bay Area Metro Center  
375 Beale Street  
San Francisco, CA 94105

**Re: Item 5 Plan Bay Area 2040 Draft Preferred Scenario and Investment Strategy**

Dear Chairs Spering and Pierce,

The Non-Profit Housing Association of Northern California (NPH) is grateful to both the ABAG Executive Board and the MTC Commission for being partners in crafting a Plan that can respond to the needs of the Bay Area's lowest income residents. We appreciate your responsiveness to our proposal for additional meetings to discuss feedback on the Plan and for staff's consideration of our concerns.

No one wants to live in a region where half the population spends nearly seventy percent of their income on housing and transportation costs. Nor is it desirable to live in a Bay Area with longer commutes and deteriorated roadways as our workforce is forced to look farther and farther away for homes they can afford. If Plan Bay Area 2040 to be a guiding document then we must plan for a Bay Area that is able to house all of its population including its young people, seniors on fixed income, teachers, medical assistants, and countless service workers who make the economy thrive but who cannot afford the region's astronomical housing costs. We must also work towards ensuring that our region's longtime residents, who have made the Bay Area what it is, can stay in the place that they call home. Unfortunately, the Draft Preferred Scenario fails to create the Bay Area that we want but instead depicts the Bay Area that we are headed towards without meaningful action.

NPH has two requests of the Joint MTC Planning and ABAG Administrative Committees: **1.) We urge staff to develop a meaningful and aggressive implementation plan to address the region's housing affordability and displacement crises that will result in a joint work program and action items for MTC and ABAG staff AND 2.) The Joint Planning and Administrative Committees should also be open to making policy assumptions and pushing for growth allocations for the Bay Area that may not necessarily be able to be modeled.**

**1. Developing a meaningful and aggressive implementation plan to address the region's housing affordability and displacement crises:**

Now is the time for bold action if we wish for the Bay Area to maintain any of its income diversity over the next 24 years. Alameda, Santa Clara and San Mateo Counties have

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already answered the call by placing over \$2 billion worth of affordable housing subsidies on the November ballot, while San Francisco voters approved a \$310 million bond in 2015 and with another on this year's ballot – it is time for the regional agencies to consider similar action to help address the yawning funding gap for affordable housing.

A final Plan Bay Area chapter should detail both the funding gaps and policy changes needed achieve the Plan's housing performance and anti-displacement targets at the desired levels. The chapter should also include a roadmap for filling in the subsidy gaps and for adopting the policy changes necessary for building and preserving affordable housing at scale as well as preventing further economic displacement of tenants. To make the Plan actionable, staff should simultaneously create a work program based on the roadmap to guide their joint work through the next iteration of Plan Bay Area in 2021. Both the implementation plan and the joint work program should be adopted at the same time as the final EIR.

**A Final Plan Bay Area chapter should at a minimum:**

**a) Detail how the Plan moves in the wrong direction in terms of housing affordability and displacement risk and present findings from UrbanSim as to why.** Staff should ensure that the model is making realistic assumptions including taking into account proposed affordable housing bonds in Alameda and Santa Clara Counties and a sales tax measure in San Mateo County as well as modeling the effect of anti-displacement policies on local jurisdictions that have such proposals on the ballot. The Plan should also examine approaches to improving local jobs-housing fit.

**b) Quantify both the funding and policy gaps for Plan Bay Area to achieve its housing affordability performance target at scale while also identifying available resources at the local, regional, state, and federal levels.**

**c) Establish a roadmap of specific housing policy actions to be taken in the near, medium, and long term to address funding gaps and shortcomings of the Plan's performance targets including identifying areas for which additional work is needed.**

- *The roadmap would specify housing actions to be undertaken by ABAG and MTC.* These actions should include fostering the creative use of billions of discretionary transportation dollars to create OBAG-like programs that incentivize and support local action targeted towards affordable housing; a proposal for a Regional Housing Trust Fund that can help finance affordable housing development at a scale commensurate with former redevelopment agencies; creation of an ongoing Infill Infrastructure Grant (IIG) Fund for sites designated for 100% affordable housing developments in PDAs and PDA-like places.

- *Actions to be undertaken in partnership with stakeholders (local jurisdictions, other agencies, stakeholder organizations)* These should include programs to promote

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local adoption of residential development and commercial impact fees to fund the production of affordable units; adoption of community benefits agreements that lead to the creation of more affordable units; implementation of existing state law to yield more deed-restricted and naturally occurring affordable units (Surplus Land Act, Teacher Housing Act, Accessory Dwelling Units including Junior Accessory Dwelling Units.)

- *Actions to be advocated for at the state level.* These include advocating for an ongoing source of affordable housing subsidy at the state level, passing a new statewide affordable housing bond, Ellis Act reform, the “Palmer Fix” for inclusionary housing, etc.
- *Actions to be advocated for at the federal level.* Restoring funding that has been cut from crucial federal programs such as HOME and CDBG and fully funding both tenant-based and project-based Housing Choice Vouchers.

**d) Commit MTC and ABAG to creating an “implementation plan” and a work program for the housing actions that are detailed in this final chapter to be adopted concurrently with the final EIR by both the ABAG Executive Board and the MTC Commission.**

**2. The Joint Planning and Administrative Committees should also be open to making policy assumptions and pushing for growth allocations for the Bay Area that may not necessarily be able to be modeled.**

UrbanSim’s complex simulations allow policymakers, stakeholders, and members of the public to better understand how land use decisions and policy assumptions are likely to impact development patterns in the Bay Area through 2040. The model is still a work in progress and, as such, the Draft Preferred Scenario has a number of flaws that must be corrected irrespective of UrbanSim’s modeling capabilities. If UrbanSim is not able to appropriately model basic housing assumptions, we should not shy away from making off-model adjustments so that the region can benefit while the model is improved.

The Draft Preferred Scenario presently assigns unrealistically high growth projections to some jurisdictions while failing to meet even basic assumptions for others. The region’s three large cities are expected to shoulder the lion’s share of the region’s housing growth (43%) while some suburban jurisdictions with access to high quality rail transit are projected to receive as many as 10 new jobs per new housing unit. For certain jurisdictions, the Draft Preferred Scenario projects less housing growth than what is called for in either the jurisdiction’s own general plan (i.e. Palo Alto) or their 8-year RHNA allocation (i.e. Livermore, Los Gatos, San Carlos). The region must address such discrepancies even if they are “off-model” or we risk pursuing a disingenuous development pattern that exacerbates the region’s displacement pressures, jobs-housing imbalance, and housing affordability crisis. NPH believes that all neighborhoods near transit and jobs should do their part to house the region’s future population.

The Draft Preferred Scenario currently makes assumptions that, in some cases, may be inconsistent with the current state of the law. For example, one of the Draft Preferred

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Scenario's major assumptions is a 10 percent inclusionary requirement on all new residential development in the Bay Area. Such requirements, outside of the context of a developer agreement or community benefits program, could be legally challenged due to the erroneous ruling in *Palmer v. Sixth Street Properties* from 2009. Because UrbanSim is unable to model future housing growth by tenure this assumption becomes doubly problematic as new inclusionary zoning requirements can only be applied to for-sale housing units while, if development trends hold, much of the region's new housing stock will be rental units. At the very least staff should also specify the income levels for whom these inclusionary units are projected to be affordable even if those numbers are likely to be halved.

Much as the model takes into account local zoning and proposed transportation funding measures, the Draft Preferred Scenario should be recalibrated to take into account proposed and adopted local housing policies. The model should include the proposed general obligation housing bonds in Alameda and Santa Clara Counties (Measures A1 and A respectively) and San Mateo County's proposed sales tax extension (Measure K). The Draft Preferred should also consider all local residential and commercial development impact fees that are targeted towards the provision of affordable homes. It should also analyze the impact of local anti-displacement policies (rent stabilization and just cause eviction ordinances) that have both been adopted and proposed.

We look forward to continuing to work with both the MTC Commission and the ABAG Executive Board as well as regional staff in the coming months to ensure that Plan Bay Area 2040 is truly the best Plan for the region. We appreciate your responsiveness to and engagement with NPH and are grateful for your work to date.

Sincerely,



**Amie Fishman**  
Executive Director  
Non-Profit Housing Association of Northern California (NPH)