

DEIR Comments on Plan Bay Area 2050/RHNA Allocation Process

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Tue 7/20/2021 1:23 AM

To: EIR Comments <eircomments@bayareametro.gov>

External Email

Dear ABAG/MTC,

I find it extremely objectionable that ABAG is now proceeding with the Plan Bay Area 2050 process when the entire methodology that produced the Plan and its RHNA allocations does not even take into account the various State Codes that it has so clearly violated in this process since 2019.

It's unfortunate that ABAG has developed a Plan that focuses almost exclusively on the high jobs/housing growth on a small geographic region in the South Bay, known as Super District #9. Allocating this huge amount of growth to a single region is against one of the key principles or Objectives of this proposed Plan, as stated by your own ABAG Staff -- "support the creation of quality job opportunities for all . . . by **MORE EVENLY DISTRIBUTING JOBS AND HOUSING** in the Bay Area".

In addition, ABAG has shown little regard for following specific California State Codes during the preparation of this Plan. One of these codes specifically states -- the "regional governmental body should explore -- in **PUBLIC** Meetings -- alternative means for dealing with intraregional jobs-housing imbalances". However, despite repeated attempts from citizens to request that ABAG study such "alternative means" ABAG/MTC has failed to do so. In fact, with **no public discussion**, they said they not look further at one of their own identified controlled growth strategies -- the positive impacts of putting business caps on cities experiencing excessive growth.

Specific State Codes have been violated in this process and those should be followed before moving forward with this Plan. These code sections are:

1) Code Section 65584.04 (d) -- specifically points to the essential role of "public participation and access shall be required in the development of the methodology and in the process of drafting and adoption of the allocation of regional housing needs. Participation by organizations other than local jurisdictions and councils of government shall be solicited in a diligent effort". This has not been done, by any organization that represents the majority of homeowners and residents in Super District #9, that is most affected by your methodology process.

2) Code Section 65584(d) (3) -- which emphasizes "intraregional balances". In this section it states that the Plan should promote the following Objective: "Promoting an improved intraregional relationship between jobs and housing." This was not done, either in the development of this entire Plan.

3) Code Section 65890.5 -- has been clearly violated as well. It specifically states that HCD must prepare and distribute a **GUIDEBOOK** that would present "methodologies for measuring the balance of jobs and housing" and identify "incentives which local, regional -- including ABAG -- and state agencies may offer the private sector to encourage developments which facilitate an improved balance between employment and residential uses". Where is such a "guidebook"?

Beyond the Code violations -- which should halt this process immediately -- I ask why does ABAG and HCD continue to rely so heavily on it's own in-house models (REMI and Bay Area Urban Sim) when it is so clear that these models have produced striking errors in the location of job concentrated growth during the period of 2010-2018, without any clear or open **PUBLIC DISCUSSION** about the model assumptions and characteristics?

ABAG should disclose and identify when "alternative methods of dealing with intraregional jobs-housing imbalances" were discussed in **open, public** sessions. And why has been no public discussion on the benefits flowing to large businesses because of this concentrated growth while the continual cost burden is so severe on local residents. Business needs to pay its fair share and ABAG and the State refuse to hold them accountable for this uncontrolled growth in jobs. They need to bare the burden of building housing for their own workers, not the tax-paying residents.

I would be remiss if I didn't also mention the so-called Plan Bay Area 2050 "public outreach" that ABAG did throughout my own city, Palo Alto. It was NONE. At no time, did ABAG hold any public discussion or meeting on PBA 2050, They did feature a bunch of "pop-ups" booths at several local farmers markets and libraries in the area, but it was not at convenient times for most residents who work during the day and with very little public notification. I attended two of them and observed what the representatives did -- it wasn't practically nothing besides handing out "sticky notes" to folks. It was a total joke and you should be ashamed of what happened at those "pop-ups". At no time, did residents get an real understanding of PBA 2050 or how it would impact their lives. Public outreach was again -- worthless to the communities most affected.

I request that ABAG reject the current methodology model and work with the community -- with much more public involvement -- for a much better future for our entire Bay Area region.

Sincerely,

Terry Holzemer

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