



LEAGUE OF WOMEN VOTERS OF THE BAY AREA
An Inter-League Organization of the San Francisco Bay Area



August 27, 2012

Ezra Rapport, Executive Director
Association of Bay Area Governments
101 Eighth Street
Oakland, CA 94607

RE: Regional Housing Needs Allocation Methodology (July 10, 2012)

Dear Mr. Rapport,

The LWVBA strongly supports a regional fair share housing plan, and believes that this plan should be consistent with compact growth principles, which include limiting future growth to existing urbanized areas to prevent urban sprawl, as well as providing workforce housing close to jobs in order to improve the jobs/housing imbalance wherever possible. The LWVBA also believes that the regional housing plan should provide for balanced and equitable housing throughout the area.

We think that the methodology put forth by ABAG does not meet these goals in several ways.

First, we believe RHNA allocations under Housing Element law should require all cities to accommodate their fair share of housing for lower-income households. Because of the emphasis on placing housing in Priority Development Areas (PDA's), wealthy, and sometimes job-rich communities (such as Menlo Park) are seeing a much lower RHNA allocation than in the 2007-14 RHNA period. Meanwhile, lower-income communities such as Oakland, San Jose, Pittsburg, and Oakley are either receiving higher RHNA allocations or numbers similar to the last period as a result of their volunteering to establish PDA's. Because identifying PDA's was voluntary, cities that provide many jobs but didn't choose to identify substantive PDA's received lower allocations than we believe appropriate, based on the strong nexus between jobs and housing.

RHNA allocations are one method under State law to promote distribution of affordable housing throughout all communities. Housing element and fair housing laws encourage wealthy communities such as Alameda, Lafayette, Los Altos, Los Gatos and Saratoga to change their restrictive zoning practices. But because most of these wealthier cities did not opt to include substantive PDA's, they received lower allocations under the current methodology.

Second, we advocate growth near viable, available transit. Yet, the RHNA allocations do not evenly match the presence of public transportation, or lack thereof, and the allocations do not adequately take into account public transportation planned for the near future. Although public transit is limited in many areas of Marin, it is also limited in much of Eastern Contra Costa County. But Eastern Contra Costa County has a higher allocation than all of Napa and Marin Counties.

We urge you to reconsider the allocations and ask for more housing in wealthier, and/or job-rich cities, such as Palo Alto, Menlo Park, Mountain View and Pleasanton. We believe this can be done while still emphasizing housing growth near transit and preventing urban sprawl.

Sincerely,

Marion Taylor,

President

Cc: Linn Warren, Director, Department of Housing and Community Development

Miriam Choin, ABAG

Paul McDougall, HCD