

Baumb, Nelly

From: Sheri Furman <sher11@earthlink.net>
Sent: Sunday, November 15, 2020 5:48 PM
To: Council, City
Cc: jdong@paweeekly.com; gsheyner@paweeekly.com; price@padailypost.com
Subject: Agenda Item 10, Nov 16 Council Meeting - RHNA Process
Attachments: PAN RHNA Nov 15 2020 Letter.docx

CAUTION: This email originated from outside of the organization. Be cautious of opening attachments and clicking on links.

Please see the attached letter from Palo Alto Neighborhoods.

Re: Item 10, November 16, 2020 – RHNA Process

November 15, 2020

Dear City Council Members:

Palo Alto Neighborhoods urges you to continue to strongly push back against ABAG's RHNA process because **it is deeply flawed, illegal and will have a considerable negative impact.**

As you know, many of your fellow Palo Altans are skeptical about what goes on behind "the curtain" at ABAG. Your friends at PAN and across town have done some research to help you in your fight to defend Palo Alto. Here's what we all came up with:

- ABAG methodology violates the California Code (see below for details)*
- ABAG uses an in-house, single jobs-based model that focuses massive job growth in only a few cities in the South Bay. ABAG is the Association of Bay Area Governments, not the Association of South Bay Cities
- Housing for the new workers will be focused in those same cities like Palo Alto where the model predicts more jobs. Why are they predicting more jobs for us? Aren't we committed to slowing growth until housing can catch up? We already have a 3-1 jobs housing imbalance. Why should we continue to add jobs when we are so far behind in housing people?
- Palo Alto's RHNA allocation has jumped to a mind-boggling 10,000 new housing units over the next eight years, compared to our current allocation of 2,000.
- A 38% increase in Palo Alto's housing stock in 10 years is an unreasonable demand of any municipality and may well destroy the lovely amenities of the City.
- Meeting these impossible goals will require up to a billion dollars of taxpayer subsidies from us, the residents of Palo Alto.
- The price of real estate in Palo Alto is among the highest in the nation. Why doesn't the model take in the feasibility of building when the cost of land is so high?
- Because Palo Alto real estate is so expensive, developers prefer building the more lucrative commercial real estate and will only grudgingly build housing, primarily high-end units. To make housing "pencil out," we'll perpetually need to keep increasing developer incentives (aka giveaways).
- Why does an unelected, non-governmental body wield so much power? From whom is its authority derived and to whom is it answerable? ABAG is a non-democratic process.
- Finally, common sense shows that it would be smarter (and cheaper) to move jobs to parts of the country seeking to increase employment.

***ABAG's METHODOLOGY UNMASKED**

California Government Code (Section 65584) mandates that RHNA numbers be consistent with ABAG's Plan Bay Area. But the same Code requires ABAG to explore alternative ways of improving jobs and housing imbalances within the region. ABAG has refused repeated public requests that they follow the Government Code that requires a serious look at alternate ways of "promoting an improved intraregional relationship between jobs and housing...in each jurisdiction" (Code Section 65584 (d) (3)". The easiest way would be to explore the beneficial impacts of realistic new job dispersion to other areas. Neither Palo Alto nor any other City Council in the Bay Area has had an open public discussion with ABAG of the impact of jobs dispersion as required by Code.

POPULATION GROWTH MODELS ARE FLAWED

“Over the past 20 years, California has experienced its slowest rates of growth ever recorded, and growth has been especially slow since 2017. According to estimates by the California Department of Finance, California’s population grew by 7.3% (or 2.7 million) from 2010 to the end of 2019; this rate is only slightly higher than the national rate of 6.3%. International migration to California has remained strong, with a net inflow of 1.5 million. But net domestic migration has been negative: about 900,000 more people left California for other states than came to California from other states. Natural increase—the difference between births and deaths—added 2.2 million residents. But birth rates are at record lows and the number of deaths is increasing as the population ages.”

(Public Policy Institute of California -- <https://www.ppic.org/publication/californias-population/>)

JOIN OTHER NETWORKS

If you haven’t already, we strongly urge you to join the following groups:

California Alliance of Local Electeds www.calelecteds.org/

The California Alliance of Local Electeds (CALE) is a network of mayors, councilmembers and other elected officials who advocate in Sacramento on significant issues that contribute to the betterment of California’s cities, including preservation of local control and support of forward-thinking legislation.

California Cities for Local Control www.facebook.com/LocalControlCA/

This groups states, “We are organizing the cities to oppose loss of local zoning control to the state. 23 cities that have PASSED resolutions for us, and just as exciting is the news that there are 22 MORE cities that have told us that they are moving forward in the next couple of weeks to pass resolutions as well!”

We at PAN are so grateful that you as our elected representatives are alarmed at this draconian measure to try to co-opt local control of our land and to subvert the will of the people. Thank you for fighting for our City.

Sincerely,

Becky Sanders
Sheri Furman
Co-Chairs
Palo Alto Neighborhoods

Baumb, Nelly

From: Jo Ann Mandinach <joann@needtoknow.com>
Sent: Sunday, November 15, 2020 12:53 PM
To: Council, City
Subject: Item #10 - RHNA - November 16 Please reject the allocation and the RHNA Process

CAUTION: This email originated from outside of the organization. Be cautious of opening attachments and clicking on links.

Dear City Council,

I've lived in Palo Alto on Middlefield Road since 1985 when I moved here from Princeton, NJ, and suffered what I called "density shock" not knowing how much more dense and gridlocked it would get. Since then we've had 3 separate incidents where our PARKED cars were hit by careless drivers and watched our neighbors suffer the same fate.

An unelected body, the Association of Bay Area Governments (ABAG), as part of its Regional Housing Needs Assessment (RHNA), has assigned the City of Palo Alto an allotment of 10,000 housing units to be built in the next 10 years:

- The RHNA cycle, every 8 years, usually assigns Palo Alto more like 2000 units to build in a ten years period
- This draconian 5 fold increase is limited to a handful of cities on the Peninsula and not the entire Bay Area.
- These cities have some of the highest land values in the country so is this even feasible
- 10,000 units will increase Palo Alto's housing stock by 38% in the next 10 and increase the number of residents by well over that in ten years.

These numbers are absurd and unfair!

Please reject ABAG's allocation of 10,000 units of housing to Palo Alto. The ABAG model is flawed, its processes are not transparent, and ABAG has refused to meet with local elected officials about this. ABAG is not even an elected body, so what authority does it really have? Please save Palo Alto from this unfair and **unrealistic demand**.

Thank you.

Jo Ann Mandinach
Middlefield Road
Palo Alto, CA 94301

Baumb, Nelly

From: Rita Vrhel <ritavrhel@sbcglobal.net>
Sent: Monday, November 9, 2020 12:21 PM
To: Council, City
Subject: agenda items

CAUTION: This email originated from outside of the organization. Be cautious of opening attachments and clicking on links.

Hello:

I urge you to **not make "lame duck" appointments** but leave this task to the next City Council as previously agreed. Obviously you are shocked at the election results and unprepared for the results.

Mr. Tanaka: you are likely the swing vote. Please show us that you work for Palo Alto residents and not special interests as many claim. Your vote could set a new tone in Palo Alto.

I hope the new City Council will take steps to curb these abuses.

I also urge you to **not make zoning changes** which will eliminate or severely curtail community serving retail. Landlords can consider other options like lowering rent to combat downturns such as being seen now. This will not last forever but zoning changes will. Our downtowns will be filled with specialty Botox or medical procedure shops rather than community serving retail. Once these shops move in they will never leave as the start up costs are too great.

I instead urge you to hire a Retail Planning Consultant to discuss a long term plan to assist in revitalizing and recovering our Univ. and Calif. Ave areas. 4th St in Berkeley is a prime example of what Palo Alto could be but isn't. Please take a step back, and plan for the future.

I also urge you to resist and say NO to the RHNA numbers. These are impossible, and unlike to occur over a 9 year period. So much is not known post COVID regarding working and commuting patterns.

I urge you to join other Cities and say NO; and sue to stop this insanity.

Thank you.

Rita C. Vrhel
Phone: 650-325-2298

Baumb, Nelly

From: Elan Music <elanloeb@gmail.com>
Sent: Sunday, November 8, 2020 4:17 PM
To: Council, City
Subject: Pushing housing goals onto EPA

CAUTION: This email originated from outside of the organization. Be cautious of opening attachments and clicking on links.

(statement for the council meeting)

As a Palo Alto resident, I am angered that we are shirking our duty and not taking our housing goals seriously. As a teacher, I am worried about my ability to continue living in the area. I have lived here since I was 7 years old and I may have to leave because of the housing crisis. This is not someone else's problem, this is our problem. Don't push this onto EPA and create issues of gentrification for them.

Thank you,
Elan loeb

Baumb, Nelly

From: slevy@ccsce.com
Sent: Sunday, November 8, 2020 3:19 PM
To: Council, City
Cc: Shikada, Ed
Subject: RHNA agenda item on Monday
Attachments: ABAGRHNA-Final060920(r).pdf

CAUTION: This email originated from outside of the organization. Be cautious of opening attachments and clicking on links.

Use this one, I forgot to attach the HCD letter and corrected two typos.

Dear Mayor Fine and council members,

I would tread very carefully in terms of any additional protest letters as the case outlined is poor, unlikely to succeed on the major points (as noted in the staff report) and if successful unlikely to result in significant reductions. The main result is more likely to alert all parties that Palo Alto does not intend to comply with state law and is protesting before even trying to develop a compliant housing element.

The allocation process given the regional total is a zero sum exercise and I see no case given the allocation criteria of priorities to high opportunity areas and access to large job pools (criteria not contested in the staff report) and in my view uncontested after listening to all the committee meetings. The staff report alludes to but does not and cannot identify better places.

If the council does decide to pursue more protests, I have some suggestions at the end of this letter.

Background

I attached the HCD regional RHNA determination letter. Staff reports accurately portray the ABAG allocation methodology committee criteria and findings.

The HCD determination letter shows

- 1) half of the units to be added address existing conditions and not projected growth
- 2) the regional determination was not in any way based on ABAG projected job growth. Rather, the DOF population projections were used. They show a projected county growth rate for the 2020-2030 period of slightly over 0.5% per year, far lower than recent growth.

If HCD had used the ABAG growth forecast to 2030, the regional housing determination would have roughly 150,000 units higher.

- 3) Nearly 60% of the units to be planned for are for low and moderate income residents and reflect legislative direction to reduce existing overcrowding and cost burdens and have a vacancy rate as described in the determination letter:

"Vacancy Adjustment: HCD applies a vacancy adjustment (standard 5% maximum to total projected housing stock) and adjusts the percentage based on the region's current vacancy percentage to provide healthy market vacancies to facilitate housing availability and resident mobility"

Note that a) the vacancy rate is a blended rate covering all types of housing and reflects state policy to move toward a more healthy market where shortages do not result in punishing annual price and rent increases.

The ABAG allocation criteria are clear. If the city has a complaint I have not heard or seen it.

Palo Alto is a high opportunity city with good schools and amenities. We have a large job base even if no more few jobs are added. We have Caltrain stations with high use, VTA service on el Camino, are at the foot of the Dumbarton access from the East Bay and freeway access.

These are the criteria for priority siting of low and moderate income housing and part of the criteria for more expensive housing.

There is no case that there are better places. Do not embarrass us and hang a "please sue us first" sign out by arguing an unarguable case.

Please acknowledge the legitimacy of the allocation policy criteria.

If the council wishes to protest small procedural issues, please at least acknowledge our approval of the high opportunity area and access to jobs criteria. That would make any appeal less embarrassing and self serving.

The allocation process versus the regional total.

I have watched the council campaign, the online comments on Town Square and the Embarcadero Institute "report".

I wonder if some community members and council members are confusing the HCD determination and the ABAG committee allocation.

One suggestion I have is to delete the EI report from any letter send on.

1) Since the agenda item discusses a response to the allocation of the regional total and the EI report does not discuss the allocation, including it is irrelevant and gratuitous.

2) The EI report is wrong in both of its major claims.

The first claim is that the HCD vacancy assumption is too high because it does not use the recent vacancy trend for owner occupied housing. One, as pointed out in the HCD letter, the 5% is their normal assumption for the total housing stock not all parts of it.

Two, as the HCD letter points out the 5% rate reflects important state housing policy priorities in light of very large price and rent increases in recent years.

Would the council favor using the recent historical college attendance %s of Latino residents (and call them "normal") in designing state educational policy for this decade?

The second claim is that DOF already accounts for mitigating existing housing shortages. Their "evidence" for this is a quote from an ABAG staff member in 2006.

The claim is false. DOF has published their housing projection methodology this year and notes a) that it does not reflect pent up demand and starts with recent household headship rates (that reflect doubling up and overcrowding as a result of growing housing unaffordability for many residents).

On a personal note I was on the advisory committee for the HCD regional methodology, have had extensive conversations over decades with the relevant HCD and DOF staff and no one ever mentioned that the HCD criteria involved double counting.

In fact the opposite is true. The HCD overcrowding criterion is more than 1 person per room and their measure omits young adults moving back with their parents and all of the doubling up where there are fewer than 1 person per total room.

So delete any reference to the EI "report" if a letter is sent AND

these issues and the potential legal jeopardy the city might face with frivolous actions can be clarified by talking with HCD staff.

Stephen Levy

Director

Center for Continuing Study of the California Economy

**DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
DIVISION OF HOUSING POLICY DEVELOPMENT**

2020 W. El Camino Avenue, Suite 500
Sacramento, CA 95833
(916) 263-2911 / FAX (916) 263-7453
www.hcd.ca.gov



June 9, 2020

Therese W. McMillan, Executive Director
Association of Bay Area Governments
375 Beale Street, Suite 700
San Francisco, CA 94105

Dear Therese W. McMillan,

RE: Final Regional Housing Need Determination

This letter provides the Association of Bay Area Governments (ABAG) its final Regional Housing Need Determination. Pursuant to state housing element law (Government Code section 65584, et seq.), the Department of Housing and Community Development (HCD) is required to provide the determination of ABAG's existing and projected housing need.

In assessing ABAG's regional housing need, HCD and ABAG staff completed an extensive consultation process from March 2019 through May 2020 covering the methodology, data sources, and timeline for HCD's determination of the Regional Housing Need. HCD also consulted with Walter Schwarm with the California Department of Finance (DOF) Demographic Research Unit.

Attachment 1 displays the minimum regional housing need determination of **441,176** total units among four income categories for ABAG to distribute among its local governments. Attachment 2 explains the methodology applied pursuant to Gov. Code section 65584.01. In determining ABAG's housing need, HCD considered all the information specified in state housing law (Gov. Code section 65584.01(c)).

As you know, ABAG is responsible for adopting a methodology for RHNA allocation and RHNA Plan for the projection period beginning June 30, 2022 and ending December 31, 2030. Pursuant to Gov. Code section 65584(d), the methodology to prepare ABAG's RHNA plan must further the following objectives:

- (1) Increasing the housing supply and mix of housing types, tenure, and affordability
- (2) Promoting infill development and socioeconomic equity, protecting environmental and agricultural resources, and encouraging efficient development patterns
- (3) Promoting an improved intraregional relationship between jobs and housing
- (4) Balancing disproportionate household income distributions
- (5) Affirmatively furthering fair housing

Pursuant to Gov. Code section 65584.04(d), to the extent data is available, ABAG shall include the factors listed in Gov. Code section 65584.04(d)(1-13) to develop its RHNA

plan, and pursuant to Gov. Code section 65584.04(f), ABAG must explain in writing how each of these factors was incorporated into the RHNA plan methodology and how the methodology furthers the statutory objectives described above. Pursuant to Gov. Code section 65584.04(h), ABAG must submit its draft methodology to HCD for review.

Increasing the availability of affordable homes, ending homelessness, and meeting other housing goals continues to be a priority for the State of California. To support these goals the 2019-20 Budget Act allocated \$250 million for all regions and jurisdictions for planning activities through the Regional Early Action Planning (REAP) and Local Early Action Planning (LEAP) Grant programs. ABAG has \$ 23,966,861 available through the REAP program and HCD applauds ABAG's efforts to engage early on how best to utilize these funds and HCD looks forward to continuing this collaboration. All ABAG jurisdictions are also eligible for LEAP grants and are encouraged to apply to support meeting and exceeding sixth cycle housing element goals. While the SB 2 Planning Grant deadline has passed, ongoing regionally tailored technical assistance is still available through that program.

In addition to these planning resources HCD encourages local governments to consider the many other affordable housing and community development resources available to local governments that can be found at <https://www.hcd.ca.gov/grants-funding/nofas.shtml>

HCD commends ABAG and its leadership in fulfilling its important role in advancing the state's housing, transportation, and environmental goals. ABAG is also recognized for its actions in proactively educating and engaging its board and committees on the RHNA process and the regional housing need, as well as creating tools to aid the public understanding in the process. HCD especially thanks Paul Fassinger, Gillian Adams, Aksel Olsen, Dave Vautin, Bobby Lu, Matt Maloney, and Elizabeth Bulgarin for their significant efforts and assistance. HCD looks forward to its continued partnership with ABAG and its member jurisdictions and assisting ABAG in its planning efforts to accommodate the region's share of housing need.

If HCD can provide any additional assistance, or if you, or your staff, have any questions, please contact Megan Kirkeby, Acting Deputy Director, at megan.kirkeby@hcd.ca.gov or Tom Brinkhuis, Housing Policy Specialist at (916) 263-6651 or tom.brinkhuis@hcd.ca.gov.

Sincerely,



Megan Kirkeby
Acting Deputy Director

Enclosures

ATTACHMENT 1

HCD REGIONAL HOUSING NEED DETERMINATION ABAG: June 30, 2022 through December 31, 2030

<u>Income Category</u>	<u>Percent</u>	<u>Housing Unit Need</u>
Very-Low*	25.9%	114,442
Low	14.9%	65,892
Moderate	16.5%	72,712
Above-Moderate	42.6%	188,130
Total	100.0%	441,176
* Extremely-Low	15.5%	Included in Very-Low Category

Notes:

Income Distribution:

Income categories are prescribed by California Health and Safety Code (Section 50093, et. seq.). Percents are derived based on Census/ACS reported household income brackets and county median income, then adjusted based on the percent of cost-burdened households in the region compared with the percent of cost burdened households nationally.

ATTACHMENT 2

HCD REGIONAL HOUSING NEED DETERMINATION: ABAG June 30, 2021 through December 31, 2030

Methodology

ABAG: PROJECTION PERIOD (8.5 years) HCD Determined Population, Households, & Housing Unit Need		
Reference No.	Step Taken to Calculate Regional Housing Need	Amount
1.	Population: December 31 2030 (DOF June 30 2030 projection adjusted + 6 months to December 31 2030)	8,273,975
2.	- <i>Group Quarters Population: December 31 2030 (DOF June 30 2030 projection adjusted + 6 months to December 31 2030)</i>	-169,755
3.	Household (HH) Population	8,159,280
4.	Projected Households	3,023,735
5.	+ Vacancy Adjustment (3.27%)	+98,799
6.	+ Overcrowding Adjustment (3.13%)	+94,605
7.	+ Replacement Adjustment (.50%)	+15,120
8.	- <i>Occupied Units (HHs) estimated June 30, 2022</i>	-2,800,185
9.	+ Cost-burden Adjustment	+9,102
Total	6th Cycle Regional Housing Need Assessment (RHNA)	441,176

Detailed background data for this chart is available upon request.

Explanation and Data Sources

- 1-4. Population, Group Quarters, Household Population, & Projected Households: Pursuant to Gov. Code Section 65584.01, projections were extrapolated from DOF projections. Population reflects total persons. Group Quarter Population reflects persons in a dormitory, group home, institute, military, etc. that do not require residential housing. Household Population reflects persons requiring residential housing. Projected Households reflect the propensity of persons within the Household Population to form households at different rates based on American Community Survey (ACS) trends.
5. Vacancy Adjustment: HCD applies a vacancy adjustment (standard 5% maximum to total projected housing stock) and adjusts the percentage based on the region's current vacancy percentage to provide healthy market vacancies to facilitate housing availability and resident mobility. The adjustment is the difference between standard 5% vacancy rate and regions current vacancy rate based (**1.73%**) on the 2014-2018 ACS data. For ABAG that difference is **3.27%**.
6. Overcrowding Adjustment: In regions where overcrowding is greater than the comparable region's overcrowding rate, or in the absence of comparable region the national overcrowding rate. HCD applies an adjustment based on the amount the regions overcrowding rate (**6.73%**) exceeds the comparable region's rate (**3.60%**). For ABAG that difference is **3.13%**. Data is from the 2014-2018 ACS.
7. Replacement Adjustment: HCD applies a replacement adjustment between .5% and 5% to the total housing stock based on the current 10-year annual average percent of demolitions the region's local government annual reports to Department of Finance (DOF). For ABAG the 10-year annual average multiplied by the length of the projection period is .40%, and the minimum **.50%** adjustment is applied.

8. Occupied Units: This figure reflects DOF's estimate of occupied units at the start of the projection period (June 30, 2022).
9. Cost Burden Adjustment: HCD applies an adjustment to the projected need by comparing the difference in cost-burden by income group for the region to the cost-burden by income group for the comparable regions, as determined by ABAG. The very-low and low income RHNA is increased by the percent difference ($66.64\% - 66.00\% = .64\%$) between the region and the comparable region cost burden rate for households earning 80% of area median income and below, then this difference is applied to very low- and low-income RHNA proportionate to the share of the population these groups currently represent. The moderate and above-moderate income RHNA is increased by the percent difference ($16.25\% - 13.10\% = 3.15\%$) between the region and the comparable region cost burden rate for households earning above 80% Area Median Income, then this difference is applied to moderate and above moderate income RHNA proportionate to the share of the population these groups currently represent. Data is from 2012-2016 CHAS.

Baumb, Nelly

From: slevy@ccsce.com
Sent: Sunday, November 8, 2020 3:13 PM
To: Council, City
Cc: Shikada, Ed
Subject: RHNA agenda item on Monday

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The claim is false. DOF has published their housing projection methodology this year and notes a) that it does not reflect pent up demand and starts with recent household headship rates (that reflect doubling up and overcrowding as a result of growing housing unaffordability for many residents).

On a personal note I was on the advisory committee for the HCD regional methodology, have had extensive conversations over decades with the relevant HCD and DOF staff and no one ever mentioned that the HCD criteria involved double counting.

In fact the opposite is true. The HCD overcrowding criterion is more than 1 person per room and their measure omits young adults moving back with their parents and all of the doubling up where there are fewer than 1 person per total room.

So delete any reference to the EI "report" if a letter is sent AND

these issues and the potential legal jeopardy the city might face with frivolous actions can be clarified by talking with HCD staff.

Stephen Levy

Director

Center for Continuing Study of the California Economy

Baumb, Nelly

From: Greg Schmid <gregschmid@sbcglobal.net>
Sent: Friday, November 6, 2020 3:03 PM
To: Council, City
Subject: Note on Agenda item
Attachments: PASZ Request to PA City Council Nov 6 2020.pdf

CAUTION: This email originated from outside of the organization. Be cautious of opening attachments and clicking on links.

This is a note from PASZ for Agenda Item 13 on the November 9 Council Meeting.

Thank you,

Greg Schmid
3428 Janice Way
gregschmid@sbcglobal.net



Palo Altans for Sensible Zoning

November 6, 2020

City.council@cityofpaloalto.org

THE RHNA ALLOCATION: WE NEED LEGAL INTERVENTION

Action Step

Ask the City Attorney to formally request that ABAG stop the RHNA process and follow the California Government Code.

The Issue

ABAG has just announced that Palo Alto's RHNA Housing requirement for the next eight years be raised from a current goal of two thousand new housing units to over ten thousand. Where does this astounding number come from? From an in-house process of a non-elected regional body –ABAG--that uses their own model of very aggressive job growth in a single already jobs-rich area that completely ignores California Government Code. This would dramatically change the character of our city, Palo Alto.

Over the last fourteen months, ABAG's Executive Committee and their Housing Mandate Committee have been repeatedly asked to follow the wording of the key California Government Code that describes the RHNA process (Government Code 65584). This Code specifically calls for the Regional Planning process to pay special attention to local jobs-housing imbalances and to explore incentives that would "promote an improved intraregional relationship between jobs and housing" (Code Section 65584 (d) (3)).

The most obvious way of accomplishing this goal would be to explore concrete incentives for the dispersion of jobs throughout the Bay Area. In fact, there were formal requests made to the ABAG Executive Committee by 85 signatories in August 2019, by ten speakers at an Executive Meeting in September 2019 and again by petition from the West Bay Citizens Coalition in February of 2020.

Palo Altans for Sensible Zoning
PO Box 305, Palo Alto, CA 94302
<http://sensiblezoning.org>

The ABAG Executive Committee did not respond to any of the formal requests and did not discuss any such options in public sessions. Instead, the Committee gradually released to the public the results of their in-house decision process:

--in October 2019 they stated that they would not look at jobs caps in already jobs-rich cities;

--in May 2020 they announced that the COVID crisis would not affect their longer-term job growth forecasts in jobs-rich areas;

--in July 2020 they released the results of their jobs-driven housing model that projected an extraordinary growth in both jobs and housing in a newly defined "Silicon Valley Super District" that focused future Bay Area job growth in a very limited segment of the South Bay (while reducing projected job growth in San Francisco, Oakland and other East Bay cities). These focused job growth projections were the sole basis of the RHNA housing growth forecasts that followed.

ABAG has not followed the California Government Code that calls for them to openly explore publicly alternative policies that could dampen the concentration of jobs in a small part of the Bay Area. Instead they have pushed ahead their internal modeling process without any effective public discussion of the consequences of a model that reflects the wishes of big businesses to concentrate employment in a narrow already jobs-rich section of the Bay Area. This would involve requirements of up to a billion dollars in subsidies in Palo Alto, loss of control of local zoning in the city, and possible decline in the share of family households.

The Request

We request that the City Attorney demand that ABAG and RHNA follow the state Code that requires an open public discussion of alternative ways of achieving intraregional jobs-housing balances.

(signed)

Palo Altans for Sensible Zoning

For further information, contact: gregschmid@sbcglobal.net