

**From:** [slevy@ccsce.com](mailto:slevy@ccsce.com)  
**To:** [Wong, Tim](#)  
**Subject:** memo to Housing Element Working Group  
**Date:** Monday, May 10, 2021 12:42:12 PM  
**Attachments:** [For the Housing Element Working Group.doc](#)  
[abag\\_draft\\_rhna\\_methodology\\_release\\_december2020.pdf](#)  
[ABAGRHNA-Final060920\(r\).pdf](#)

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

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Hi Tim,

Please forward this email to the working group and not the one I sent earlier. In this memo I answer the questions raised at the meeting about the origin of the population projections used by HCD.

Thanks

Steve

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DATE: May 10, 2021

TO: **Housing Working Group**

FROM: Stephen Levy

SUBJECT: Follow up to your first meeting

Thanks to all members for volunteering for this task. The memo below responds to some questions raised at the meeting.

**Background**

I know some of you but not all so I start with my background.

My primary work for more than 30 years is assisting regional planning agencies develop their long-term growth forecasts and related policy implications.

In the course of that work I have had many interactions with staffs at HCD and DOF and related to that served on the advisory committees both for HCD re developing a RHNA methodology and DOF re household growth projections. I served on the SCAG (southern California regional planning agency) advisory committee on their RHNA allocation, participated in their RHNA appeal and watched many of the local jurisdiction appeals of their allocations.

I also watched all of the ABAG RHNA methodology committee hearings.

I maintain ongoing relationships with HCD and DOF technical staff.

**Issues**

There were two steps in developing the Palo Alto draft RHNA allocation.

Step 1 was for HCD to give ABAG a regional housing needs determination. The letter from HCD to ABAG is attached. Step 2 was for ABAG to allocate the regional total and by income group to local jurisdictions. Their allocation methodology memo is also attached.

Before getting into the details and answering questions from your first meeting, I want to note the high level policy emphases of both agencies.

HCD in furtherance of state policy was trying to address and remediate the housing challenges facing low and moderate income residents that in recent years have caused doubling and tripling of households and increasingly long commutes to find housing folks could afford.

ABAG in furtherance of equity and environmental goals emphasized allocating housing goals to communities that they considered "high opportunity areas"—good schools and amenities and areas that had jobs with better access to public transit and car commutes. Palo Alto ranked high on both criteria.

### **The HCD Bay Area RHNA Allocation**

At your first meeting the consultant showed a slide that said the allocation was based on future growth. This is partially correct (Tim Wong corrected the potential misinterpretation) but is also misleading.

In fact future growth accounts for roughly half of the Bay Area RHNA allocation and the increase in the region's allocation compared to the last allocation is the result of non-growth factors in the allocation.

The numbers below are in the HCD RHNA letter for those who want to check.

Vacancy Rate adjustment 98,799 units  
Overcrowding adjustment 94,605  
Replacement adjustment 15,120  
Cost burden adjustment 9,102  
Total allocation 441,176

HCD explains the vacancy adjustment in their 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. The adjustment is the difference between standard 5% vacancy rate and region's current vacancy rate based (1.73%) on the 2014-2018 ACS data. For ABAG that difference is 3.27%

The overcrowding and cost burden adjustment are to bring the regional rates in line with national averages, not to eliminate these factors.

I understand that a local organization has questioned these assumptions and if members want I can come and point out why these assumptions are reasonable and why the questions raised have no basis in fact.

The main point to reiterate is that HCD for the state was trying to address and mitigate real human distress that came as housing starts stagnated and prices and rents surged after 2015 putting major stress on many residents.

### **The ABAG Allocation to Palo Alto**

ABAG used a two step process as described on page 3 of the attached memo. They give each jurisdiction a baseline allocation based on the ABAG growth forecast. Their baseline forecast has already been adjusted downward sharply for PA and as a result PA is assigned now roughly 6,000 units down from 10,000 in their earlier allocation.

Then ABAG adjusted the baseline allocation based on high opportunity areas and access to jobs.

For low and very low income units the adjustment was based on 70% for access to high opportunity areas and 15% each to access to jobs from public transit and cars.

For moderate and above moderate units the adjustments were based 40% on access to high opportunity areas and 60% on access to jobs for cars.

Palo Alto scored high on these criteria and ended with an above average housing growth rate in the region.

The access to high opportunity areas is based on the research that residents and their children do better when they are able to live in these areas. The access to jobs is based on the finding that these sites reduce car commuting, commuting time and also to some extent non commute car travel with benefits of reduced GHG and more family time. Both criteria also have benefits to the economy and labor mobility.

### **The Population Projection Used by HCD for the Bay Area**

There was a question about the population projections used by HCD at the first meeting.

As noted in the HCD determination letter, they used a population projection developed by DOF.

The DOF population projections for the state and county were updated (lowered) in 2020 to take account of falling birth rates and lower resident immigration.

Here is the link for those who wish to see the DOF methodology.

<https://dof.ca.gov/Forecasting/Demographics/Projections/>

## RELEASE OF ABAG DRAFT RHNA METHODOLOGY AND FINAL SUBREGIONAL SHARES

December 18, 2020

### What is RHNA?

The Regional Housing Needs Allocation (RHNA) is the state-mandated<sup>1</sup> process to identify the share of the statewide housing need for which each community must plan. As the Council of Governments (COG) for the Bay Area, the Association of Bay Area Governments (ABAG) is responsible for developing a methodology for allocating a share of the Regional Housing Need Determination (RHND) the Bay Area received from the California Department of Housing and Community Development (HCD)<sup>2</sup> to every local government in the Bay Area.

The RHNA methodology is a formula that quantifies the number of housing units, separated into four income categories,<sup>3</sup> that will be assigned to each city, town, and county in the region. The allocation must meet the statutory objectives identified in Housing Element Law<sup>4</sup> and be consistent with the forecasted development pattern from Plan Bay Area 2050.<sup>5</sup> Each local government must then update the Housing Element of its General Plan and its zoning to show how it can accommodate its RHNA allocation.

### How was the Draft RHNA Methodology for the 2023-2031 RHNA Cycle Developed?

ABAG convened an ad hoc [Housing Methodology Committee](#) (HMC) from October 2019 to September 2020 to advise staff on the methodology for allocating a share of the region's total housing need to every local government in the Bay Area. The HMC included local elected officials and staff as well as regional stakeholders to facilitate sharing of diverse viewpoints across multiple sectors.<sup>6</sup> At its final meeting on September 18, the HMC voted to recommend **Option 8A: High Opportunity Areas Emphasis & Job Proximity** with the 2050 Households baseline allocation as the Proposed RHNA Methodology. On October 1, the ABAG Regional Planning Committee voted to recommend this methodology for approval by the Executive

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<sup>1</sup> See California [Government Code Section 65584](#).

<sup>2</sup> In a [letter dated June 9, 2020](#), HCD provided ABAG with a total RHND of 441,176 units for the 2023-2031 RHNA.

<sup>3</sup> State law defines the following RHNA income categories:

- Very Low Income: households earning less than 50 percent of Area Median Income (AMI)
- Low Income: households earning 50 - 80 percent of AMI
- Moderate Income: households earning 80 - 120 percent of AMI
- Above Moderate Income: households earning 120 percent or more of AMI

<sup>4</sup> See [California Government Code Section 65584\(d\)](#).

<sup>5</sup> See [Government Code Section 65584.04\(m\)\(1\)](#).

<sup>6</sup> The HMC roster is available at [https://abag.ca.gov/sites/default/files/hmc\\_roster\\_06\\_16\\_2020\\_0.pdf](https://abag.ca.gov/sites/default/files/hmc_roster_06_16_2020_0.pdf).

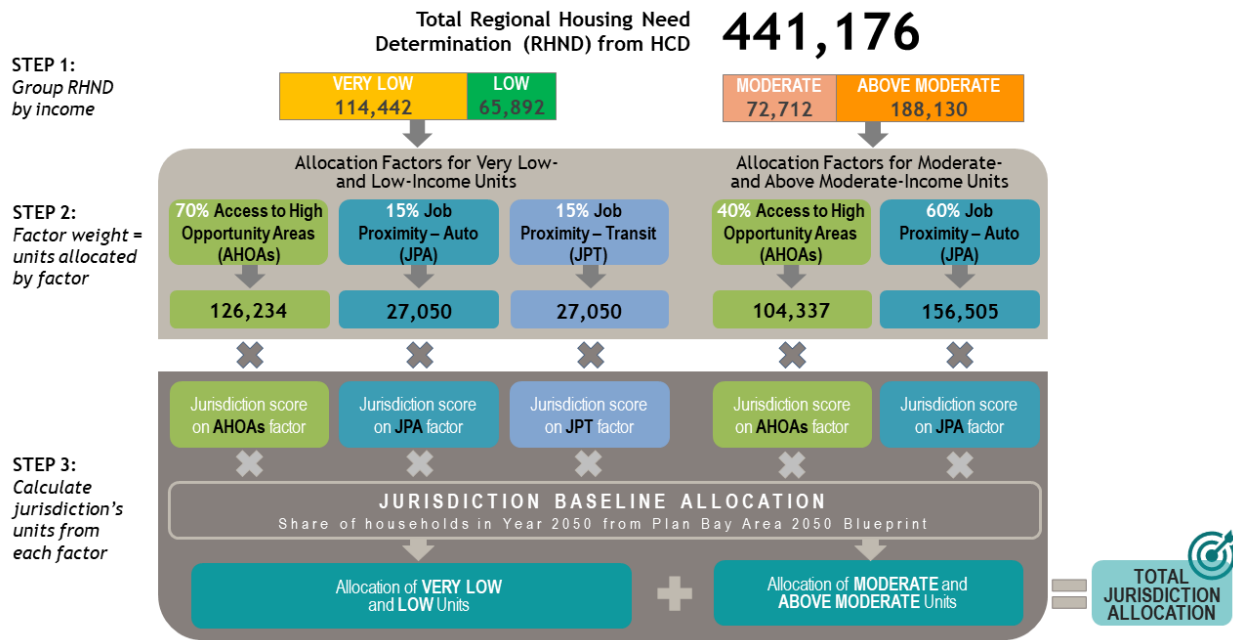
Board, and the Board approved its release as the Proposed RHNA Methodology for public comment on October 15, 2020. Materials related to the Proposed RHNA Methodology have been posted on ABAG's website since October 24 (<https://abag.ca.gov/our-work/housing/rhna-regional-housing-needs-allocation>).

As required by law, ABAG held a public comment period from October 25 to November 27 and conducted a public hearing at the November 12 meeting of the ABAG Regional Planning Committee. ABAG heard 29 oral comments and received 106 written comments on the Proposed Methodology during the public comment period. These comments provided perspectives from over 200 local government staff and elected officials, advocacy organizations, and members of the public, as some letters represented multiple signatories. **Appendix 1** summarizes the public comments received and initial staff responses.

### **What is the Draft RHNA Methodology for the 2023-2031 RHNA Cycle?**

ABAG-MTC staff considered the comments received during the public comment period and is not proposing to make any adjustments to the baseline allocation or factors and weights in the Draft RHNA Methodology. The components of the Draft RHNA Methodology are the same as the Proposed RHNA Methodology (**Figure 1**). However, the Draft RHNA Methodology incorporates future year 2050 households data generated from the Plan Bay Area 2050 Final Blueprint, which is being released concurrently with the Draft RHNA Methodology. As noted in the Proposed Methodology, the illustrative allocations reflected baseline data on 2050 households from the Plan Bay Area 2050 Draft Blueprint, with updates slated throughout fall 2020 to reflect the revised Strategies and Growth Geographies approved by the ABAG Executive Board and Commission in September 2020 for the Final Blueprint. Integrating the updated data about future year 2050 households from the Final Blueprint into the Draft RHNA Methodology results in changes to the illustrative allocations to local jurisdictions.

**Figure 1: Proposed RHNA Methodology Overview**<sup>7</sup>



There are two primary components to the Draft RHNA Methodology:

**1. Baseline allocation: 2050 Households (Blueprint)**

The baseline allocation is used to assign each jurisdiction a beginning share of the RHND. The baseline allocation is based on each jurisdiction’s share of the region’s total households in the year 2050 from the [Plan Bay Area 2050 Blueprint](#).<sup>8</sup> Using the 2050 Households baseline takes into consideration the number of households that are currently living in a jurisdiction as well as the number of households expected to be added over the next several decades.

**2. Factors and weights for allocating units by income category:**

Table 1: Factors and Weights for Proposed RHNA Methodology	
Very Low and Low Units	Moderate and Above Moderate Units
70% Access to High Opportunity Areas	40% Access to High Opportunity Areas
15% Job Proximity – Auto	60% Job Proximity – Auto
15% Job Proximity – Transit	

**Table 1** shows the factors and weights in the Draft RHNA Methodology. Each factor represents data related to the methodology’s policy priorities: access to high opportunity areas and proximity to jobs. The factors and weights adjust a jurisdiction’s baseline allocation

<sup>7</sup> The [RHNA Proposed Methodology Report](#) provides more details about the methodology.

<sup>8</sup> Plan Bay Area 2050 is the Regional Transportation Plan/Sustainable Communities Strategy for the Bay Area.

up or down, depending on how a jurisdiction scores on a factor compared to other jurisdictions in the region. The weight assigned to each factor (i.e., the percentages shown in Table 1) determines the share of the region's housing need that will be assigned by a factor.

### **How do the Results from the Draft RHNA Methodology Compare to those from the Proposed RHNA Methodology?**

As noted above, the Draft RHNA Methodology uses data from the Plan Bay Area 2050 Final Blueprint. Whereas the Plan Bay Area 2050 Draft Blueprint featured 25 strategies that influenced the location of future growth, the Final Blueprint features 35 revised strategies adopted by the ABAG Executive Board and Commission in fall 2020. These strategies shift the regional growth pattern, with generally small to moderate impacts on RHNA allocations. Additionally, the Final Blueprint features updated baseline data based on consultation with local jurisdictions in summer and fall 2020.

Therefore, incorporating the Final Blueprint into the Draft RHNA Methodology results in changes to the illustrative allocations to local jurisdictions. ABAG-MTC staff has developed several resources to help local jurisdictions, stakeholders, and members of the public better understand how the illustrative allocations from the Draft RHNA Methodology (which uses the Final Blueprint as the baseline allocation) compare to those from the Proposed RHNA Methodology (which used the Draft Blueprint as the baseline allocation). The maps in **Appendix 2** show each jurisdiction's growth rate and total allocation and **Appendix 3** shows illustrative allocations for each jurisdiction. *Note: the allocation results for jurisdictions are only illustrative. Local governments will receive their final allocations in late 2021.*

As noted previously, Housing Element Law requires that the RHNA methodology meet the five statutory objectives of RHNA and that it be consistent with the forecasted development pattern from Plan Bay Area 2050. ABAG-MTC staff developed a set of performance metrics to evaluate how well a methodology does in meeting the RHNA objectives. Evaluation of the Draft RHNA Methodology shows that it furthers all of the RHNA objectives. **Appendix 4** compares the results for the Draft RHNA Methodology and Proposed RHNA Methodology.

ABAG-MTC staff also developed a framework for evaluating consistency between RHNA and Plan Bay Area 2050. RHNA and Plan Bay Area 2050 are determined to be consistent if the 8-year growth level from RHNA does not exceed the 35-year growth level at the county and sub-county geographies used in the Plan. Staff evaluated the Draft RHNA Methodology using this approach and determined that RHNA and Plan Bay Area 2050 remain consistent.<sup>9</sup>

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<sup>9</sup> The Draft RHNA Methodology and Plan Bay Area 2050 are consistent for all nine counties and in 33 of 34 superdistricts (i.e., sub-county areas) using the methodology developed during the HMC process. In the one superdistrict flagged during the consistency check, the Final Blueprint reflects the loss of more than 1,000 homes in



## Final Subregional Shares

Housing Element Law allows two or more neighboring jurisdictions to form a “subregion” to conduct a parallel RHNA process to allocate the subregion’s housing need among its members.<sup>10</sup> ABAG must assign each subregion a share of the Bay Area’s RHND, which represents the total number of units, by income category, the subregion must allocate to its member jurisdictions. The ABAG Executive Board approved the release of Draft Subregional Shares for public comment on October 15, 2020. ABAG received no comments on the Draft Subregional Shares during the public comment period. The Final Subregional Shares have been updated based on the integration of the Final Blueprint into the Draft RHNA Methodology. **Appendix 5** provides more details about the Final Subregional Shares.

## Winter Office Hours

Local jurisdiction staff and partner organizations are invited to book office hours with MTC-ABAG planners to discuss the Final Blueprint outcomes and the Draft RHNA Methodology updates in more detail. Winter Office Hour appointments are available for booking from December 21, 2020 to January 15, 2021. Visit [bit.ly/2VpczrC](https://bit.ly/2VpczrC) to book your appointment.

Please note Winter Office Hour appointments are limited to local jurisdiction staff and partner organizations. Individual members of the public are encouraged to submit questions or comments via email to [rhna@bayareametro.gov](mailto:rhna@bayareametro.gov).

## RHNA Next Steps

The ABAG Regional Planning Committee will consider the Draft RHNA Methodology and make a recommendation to the ABAG Executive Board at its meeting on January 14, 2021. The ABAG Executive Board is slated to take action on the Draft RHNA Methodology at the January 21, 2021 meeting. After a Draft RHNA Methodology is adopted by the Executive Board, ABAG will submit the methodology to HCD for review and then use the state agency’s feedback to develop a final methodology and draft RHNA allocation in spring 2021. Release of the draft allocation will be followed by an appeals period in the summer of 2021, with the final RHNA allocation assigned to each of the Bay Area’s local governments in late 2021.

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wildfires since 2015. Anticipated reconstruction of these units during the RHNA period does not yield significant net growth in housing units, making these allocations consistent with the Final Blueprint long-range projections.

<sup>10</sup> [Government Code Section 65584.03](#).

## Appendix 1: Summary of Public Comments Received and Preliminary Responses from ABAG-MTC Staff

### Public Comment Period for the Proposed RHNA Methodology

Housing Element Law requires ABAG to hold a public comment period and conduct at least one public hearing to receive oral and written comments on the Proposed RHNA Methodology<sup>1</sup> and Draft Subregional Shares<sup>2</sup> prior to adoption of the Draft RHNA Methodology and Final Subregional Shares. The written public comment period began on October 25 and ended on November 27 per the Notice of Public Hearing published in newspapers and an ABAG press release. Additionally, ABAG held a public hearing at the November 12 meeting of the Regional Planning Committee, where 29 local government representatives, advocacy organizations, and members of the public provided oral comments on the proposed methodology.

### Geographic Representation and Respondent Types for Comments Received

During the public comment period, ABAG received 106 written comments on the Proposed RHNA Methodology. These letters provided perspectives from over 200 local government staff and elected officials, advocacy organizations, and members of the public, as some letters represented multiple signatories. In total, 42 of ABAG's 109 jurisdictions were signatories on letters received during the public comment period. **Table 1** shows the number of written and oral comments received from advocacy organizations, members of the public, and various public agencies across the nine-county Bay Area.<sup>3</sup> ABAG received no comments on the Draft Subregional Shares.

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<sup>1</sup> [California Government Code 65584.04 \(d\)](#)

<sup>2</sup> [California Government Code 65584.03 \(c\)](#)

<sup>3</sup> The sum of the number of letters received in Table 1 exceeds 106, as two letters had signatories from public agencies across multiple counties. Similarly, the sum of the number of oral comments in Table 1 exceeds 29 because one of comments came from a special district that represents both San Mateo and Santa Clara Counties.

Table 1. Share of public comments received from different types of respondents

Type of Respondent	Number of Letters Received	Number of Oral Comments from Public Hearing
Public Agency – Alameda	5	0
Public Agency – Contra Costa	3	0
Public Agency – Marin	11	1
Public Agency – Napa	2	0
Public Agency – San Francisco	0	0
Public Agency – San Mateo	11	2
Public Agency – Santa Clara	8	2
Public Agency – Solano	1	0
Public Agency – Sonoma	1	0
Advocacy Organizations	9	8
Members of the Public	57	17

### Most Common Themes from Comments Received

**Table 2** below summarizes the key themes that are most prevalent across the comments received about the Proposed RHNA Methodology. The themes are ordered roughly in terms of how many letters and oral comments mentioned them, though it is worth noting that some letters represented comments from multiple jurisdictions, advocacy organizations, and/or individual members of the public. The table also includes a brief, preliminary response about the Draft RHNA Methodology (which incorporates data from the Plan Bay Area 2050 Final Blueprint) from ABAG staff responding to the different topics in the comment letters. Comment letters on the Proposed RHNA Methodology will receive a more specific response in the coming weeks, with responses to local jurisdictions slated prior to the January ABAG Executive Board meeting.

Table 2. Most common themes from written comments received

<p><b>1. Jurisdiction is built out and/or lacks infrastructure to accommodate its allocation:</b> Comments noted a lack of developable land and the inability to provide the services and infrastructure that would be needed as a result of growth from RHNA. Some residents objected to any new housing growth.</p>
<p><b>Preliminary ABAG Response:</b> Housing Element Law requires RHNA to increase the housing supply and mix of housing types for all jurisdictions. ABAG-MTC staff worked with local governments to gather information about local plans, zoning, physical characteristics and potential development opportunities and constraints. This information was used as an input into the Plan Bay Area 2050 Blueprint, which is used as the baseline allocation in the Draft RHNA Methodology. The Final Blueprint that was integrated into the Draft RHNA Methodology includes a number of updates based on corrections to local data provided by jurisdiction staff. The Blueprint allows additional feasible growth within the urban footprint by increasing allowable residential densities and expanding housing into select areas currently</p>

zoned for commercial and industrial uses. Ultimately, by law, ABAG cannot limit RHNA based on existing zoning or land use restrictions. The statute also requires ABAG to consider the potential for increased residential development under alternative zoning ordinances and land use restrictions.

**2. The methodology should focus more on transit and jobs to better align with Plan Bay Area 2050 and the statutory RHNA objective to promote infill development and achieve greenhouse gas emissions reduction targets:** Comments suggested that proposed methodology directs too much RHNA to jurisdictions without adequate transit and/or with few jobs. These comments also argued that changing the RHNA methodology's baseline allocation to household growth from the Blueprint would better align the methodology with Plan Bay Area 2050 and statutory goals related to greenhouse gas emission reductions and sustainability.

**Preliminary ABAG Response:** The Draft RHNA Methodology directly incorporates the forecasted development pattern from the Plan Bay Area 2050 Blueprint as the baseline allocation. The Blueprint emphasizes growth near job centers and in locations near transit, as well as in high-resource areas, with the intent of reducing greenhouse gas emissions. The strategies incorporated into the Blueprint help improve the region's jobs-housing balance, leading to shorter commutes—especially for low-income workers.

The inclusion of job proximity by both automobile and transit as factors in the Draft RHNA Methodology also furthers the RHNA objective related to efficient development patterns and greenhouse gas emission reductions by encouraging shorter commutes for all modes of travel. The job proximity factors allocate nearly half of the total number of housing units assigned to the Bay Area by the State. This includes allocating 15% of the region's lower-income units based on a jurisdiction's proximity to jobs that can be accessed by public transit.

Accordingly, the performance evaluation metrics indicate that the Draft RHNA Methodology performs well in meeting all five of the RHNA statutory objectives. This analysis shows that the draft methodology results in jurisdictions with the most access to jobs and transit as well as jurisdictions with the lowest vehicle miles traveled per resident experiencing higher growth rates from their RHNA allocations than other jurisdictions in the region. In contrast, the performance evaluation metrics also show that, while using Plan Bay Area 2050 household growth as the RHNA methodology's baseline performs marginally better on the RHNA objective related to reducing greenhouse gas emissions, it may fall short in achieving statutory requirements related to affirmatively furthering fair housing. Staff evaluated the 8-year allocations from the Draft RHNA Methodology and the 35-year housing growth from Plan Bay Area 2050 at the county and subcounty levels and determined that RHNA and the Plan are consistent.<sup>4</sup>

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<sup>4</sup> The Draft RHNA Methodology and Plan Bay Area 2050 are consistent for all nine counties and in 33 of 34 superdistricts (i.e., sub-county areas), using the methodology approved during the HMC process. Relatively unique circumstances exist in the one superdistrict flagged during the consistency check (superdistrict 28). In this superdistrict, net housing growth between 2015 and 2050 is less than the eight-year RHNA for the associated jurisdictions. However, wildfires prior to the 2023 to 2031 RHNA cycle destroyed more than 1,000 homes. Because of the loss in housing units early in the 35-year analysis period, the eight-year allocations remain consistent with the

**3. Methodology needs to directly incorporate hazard risk:** Comments suggested the methodology allocated too much growth near areas with high wildfire risk and exposure to other natural hazards such as sea-level rise. Others felt the Blueprint needs to better incorporate hazard data, particularly related to wildland-urban interface (WUI) maps and FEMA floodways.

**Preliminary ABAG Response:** Including the Blueprint in the RHNA methodology addresses concerns about natural hazards, as the Blueprint excludes areas with unmitigated high hazard risk from Growth Geographies. The Blueprint Growth Geographies exclude CAL FIRE designated “Very High” fire severity areas as well as county-designated WUIs where applicable. The Blueprint strategies focus future growth away from the highest fire risk zones, support increased wildland management programs, and support residential building upgrades that reduce the likelihood for damage when fires occur in the wildland urban interface.

The Blueprint incorporates strategies to mitigate the impacts of sea level rise, protecting nearly all communities at risk from two feet of permanent inundation. Riverine flooding is not yet integrated into the Blueprint because existing research does not provide guidance on how to model impacts of temporary riverine flooding to buildings and land value. Communities can choose to take these risks into consideration with where and how they site future development, either limiting growth in areas of higher hazard or by increasing building standards to cope with the hazard.

**4. Support for proposed methodology:** Comments from residents, local jurisdictions, and a diverse range of advocacy organizations supporting the methodology emphasized its importance for furthering regional equity.

**Preliminary ABAG Response:** Staff’s analysis aligns with these comments and indicates the Draft RHNA Methodology successfully furthers all five of the statutory objectives of RHNA, including requirements related to affirmatively furthering fair housing.

**5. Need to account for impacts from COVID-19:** Comments generally focused on the effects of the pandemic and suggest either delaying RHNA or reconsidering the focus on proximity to jobs.

**Preliminary ABAG Response:** Staff appreciates concerns about the significant economic and societal changes resulting from COVID-19, and these concerns were relayed to the State in early summer. However, the Regional Housing Need Determination (RHND) from HCD has been finalized at this point in time. ABAG is obligated by state law to move forward with the RHNA process so jurisdictions can complete updates to their Housing Elements on time.

Additionally, the eight-year RHNA cycle (which starts in 2023) represents a longer-term outlook than the current impacts of the pandemic in 2020 and 2021. The potential impacts of the trend toward telecommuting in the longer term are incorporated into the RHNA methodology through the integration of the Plan Bay Area 2050 Blueprint, which includes

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long-range projections for this portion of the Bay Area, as the reconstruction of units during the RHNA period does not lead to significant net growth from 2015 levels.

strategies to expand commute trip reduction programs through telecommuting and other sustainable modes of travel.

**6. Concerns about allocation to unincorporated areas:** Comments argued that the methodology allocates too much growth to unincorporated areas that are rural and lack infrastructure to support development.

**Preliminary ABAG Response:** The Plan Bay Area 2050 Blueprint forecasts very little growth in unincorporated county areas, and that growth is focused inside urban growth boundaries. The RHNA allocations to these areas are driven, largely, by the number of existing households in unincorporated county areas, since the 2050 Households baseline in the Draft RHNA Methodology is the sum of existing households and forecasted household growth. Use of the Final Blueprint as the baseline allocation in the RHNA methodology resulted in smaller allocations for most of the counties in the region compared to the Proposed RHNA Methodology, which relied on the Draft Blueprint. ABAG-MTC will continue discussions with local jurisdictions about opportunities to direct additional RHNA units to incorporated areas, including the use of the provisions in Housing Element Law that allow a county to transfer a portion of its RHNA allocation to a city or town after it receives its RHNA allocation from ABAG.<sup>5</sup>

**7. Support for adding the “equity adjustment” proposed by some HMC members to the methodology:** Comments were generally supportive of the methodology but noted the HMC-proposed equity adjustment should be included to advance the statutory requirement to affirmatively further fair housing.

**Preliminary ABAG Response:** Staff notes the importance of meeting all statutory requirements, including the mandate to affirmatively further fair housing. However, staff’s analysis indicates the Draft RHNA Methodology does successfully achieve all five statutory objectives of RHNA. At the final HMC meeting, staff recommended that the HMC not move forward with the proposed equity adjustment as this change would increase the complexity of the methodology for minimal impact on RHNA allocations. The proposed equity adjustment would shift less than 2 percent of the region’s lower-income RHNA to the jurisdictions identified by an HMC-proposed composite score as exhibiting above-average racial and socioeconomic exclusion. However, the underlying methodology for the composite score and adjustment approach would make it more difficult for local policy makers and members of the public to understand the RHNA methodology. Ultimately, the HMC chose not to move forward with the proposed equity adjustment in its recommended RHNA methodology.

**8. Concern that HCD’s Regional RHND calculation was inaccurate and too high:** Comments from several members of the public and one local jurisdiction expressed the belief that HCD’s RHND calculations may have been flawed and resulted in ABAG receiving an allocation from the state that was too large.

**Preliminary ABAG Response:** The determination provided by HCD is based on a population forecast from the California Department of Finance (DOF), which is then modified by staff at DOF and HCD to tackle overcrowding and make other adjustments as specified in law. The

<sup>5</sup> [Government Code Section 65584.07](#).

procedures for calculating the RHND are clearly specified in state law and the grounds for an appeal were narrowly designed by the Legislature. ABAG staff have reviewed HCD's calculation methodology and believe it adheres to applicable legal requirements. The ABAG Board ultimately decided not to appeal the RHND in June 2020. At this time, the window of appeal of the RHND is now closed. Further feedback on this element of the process is most appropriately provided to HCD, rather than ABAG.

**9. Jurisdiction-specific issues with Plan Bay Area 2050 Blueprint:** Some jurisdictions had concerns about the accuracy of the Blueprint's underlying data. Others felt the Blueprint needs to better incorporate hazard data, particularly related to wildland-urban interface (WUI) maps and FEMA floodways.

**Preliminary ABAG Response:** Local jurisdiction staff were provided with several months to comment on the BASIS data used as the input for the Blueprint, as well as the additional public comment period on the Draft Blueprint during Summer 2020. ABAG-MTC staff appreciates jurisdictions' feedback on Blueprint data and has worked directly with local jurisdiction staff to address these concerns.

### **Next Steps**

Staff will consider comments and will recommend any necessary adjustments for integration into the Draft RHNA Methodology, which is scheduled for release in the next week. The ABAG Regional Planning Committee will consider the Draft RHNA Methodology and make a recommendation to the ABAG Executive Board the Draft RHNA Methodology at its meeting on January 14, 2021 and the ABAG Executive Board is slated to take action on the Draft RHNA Methodology at the January 21, 2021 meeting.

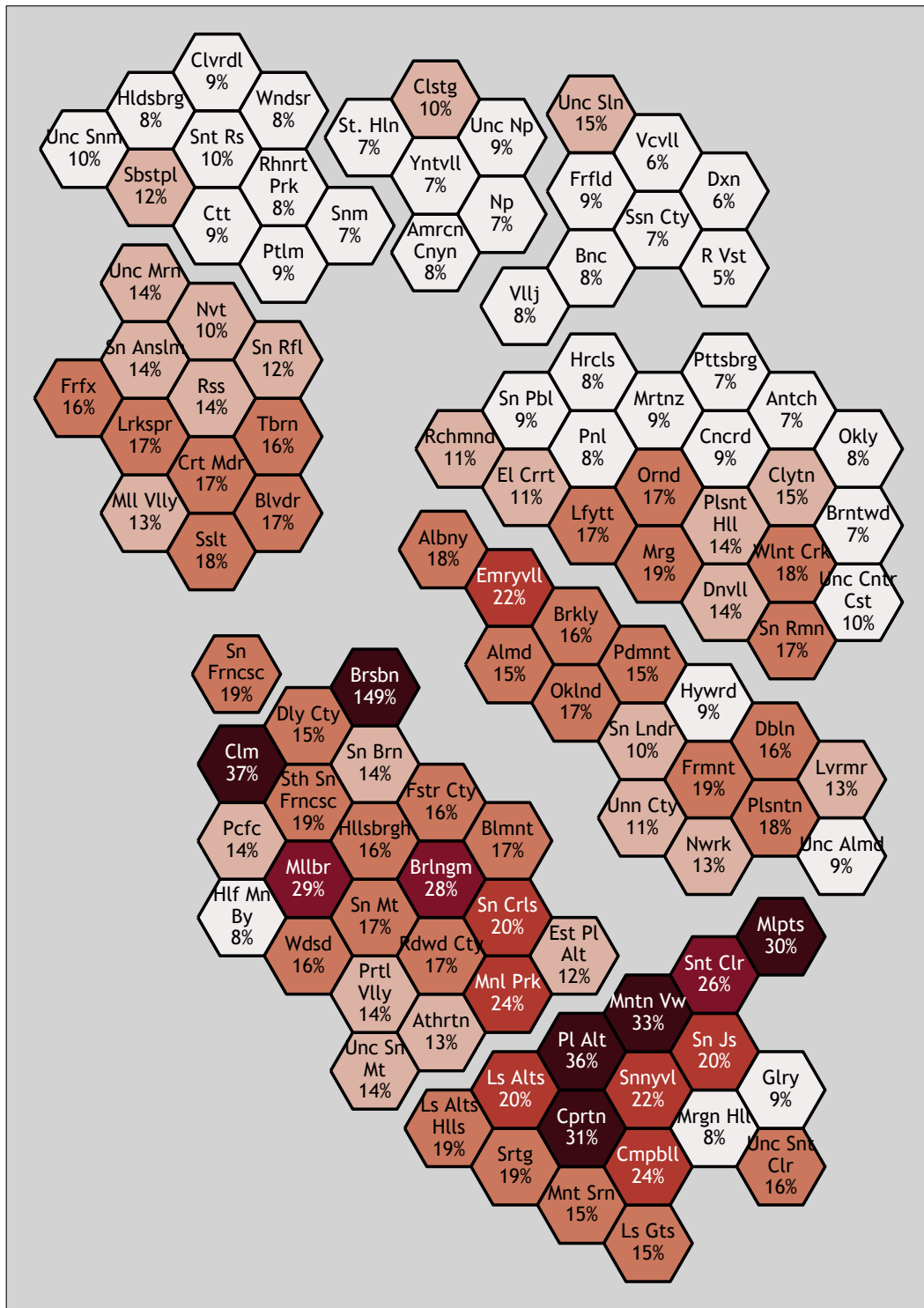
After a Draft RHNA Methodology is adopted by the Executive Board, ABAG will submit the methodology to HCD for review and then use the state agency's feedback to develop a final methodology and draft RHNA allocation in spring 2021. Release of the draft allocation will be followed by an appeals period in the summer of 2021, with the final RHNA allocation assigned to each of the Bay Area's local governments in late 2021.



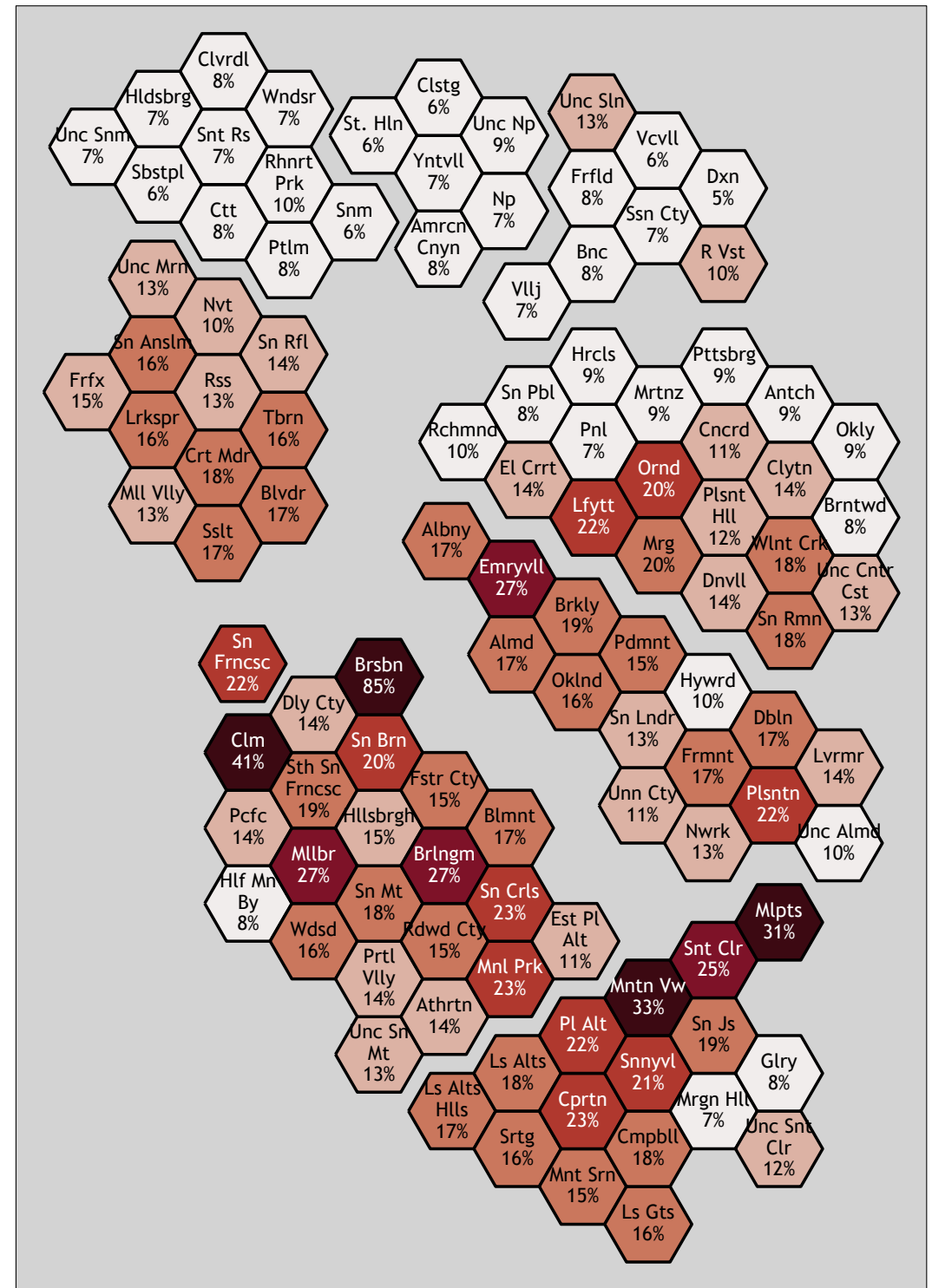
# Appendix 2: Illustrative Results of Proposed RHNA Methodology (Draft Blueprint) and Draft RHNA Methodology (Final Blueprint)

Note: the jurisdiction-specific allocations shown are for illustrative purposes only. ABAG will issue Final Allocations by the end of 2021.

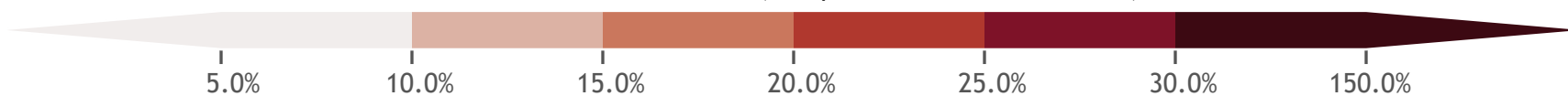
**Proposed RHNA Methodology  
(Baseline: 2050 Households (Draft Blueprint))**



**Draft RHNA Methodology  
(Baseline: 2050 Households (Final Blueprint))**



Jurisdiction Growth Rate (Compared to 2020 Households)

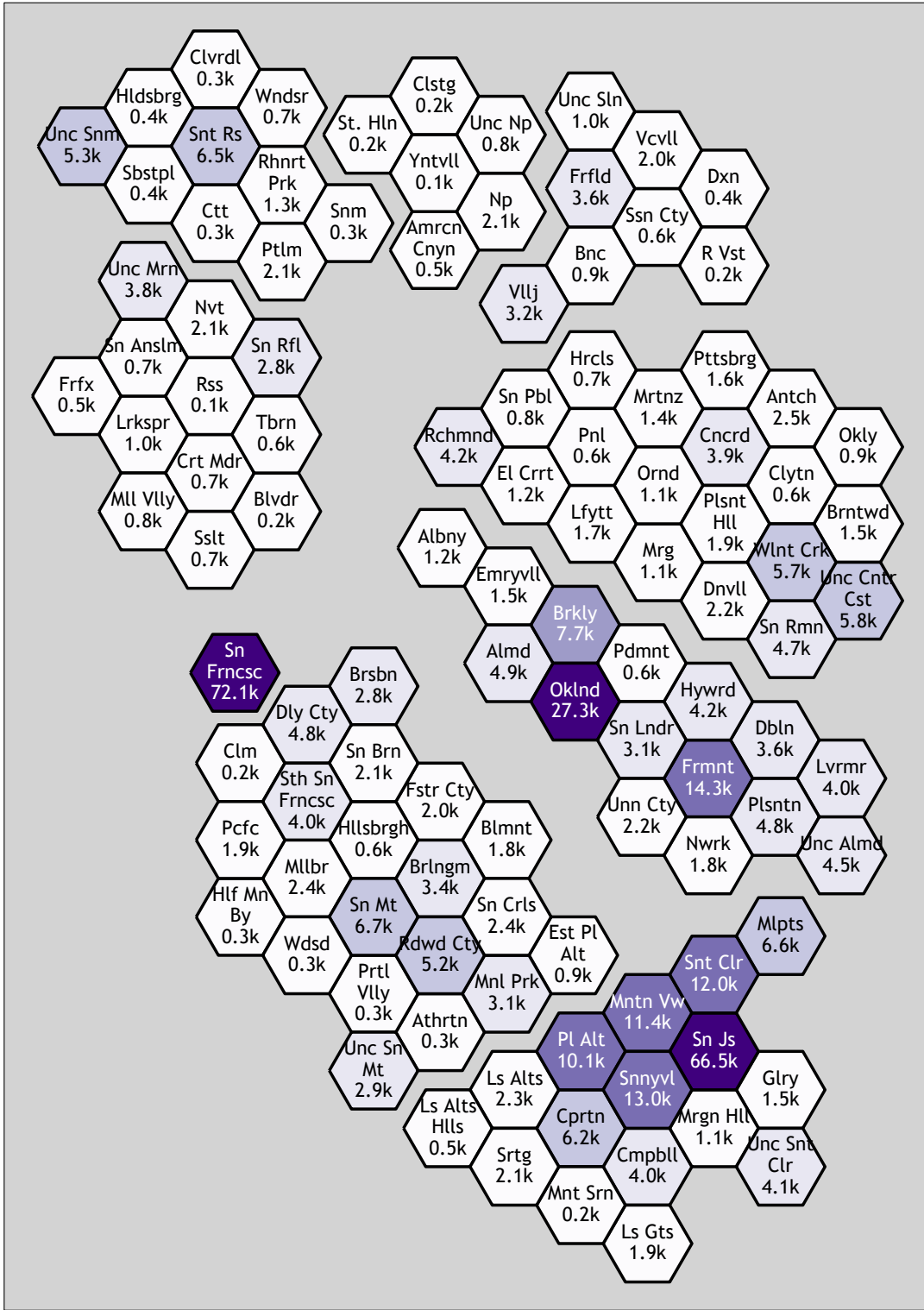




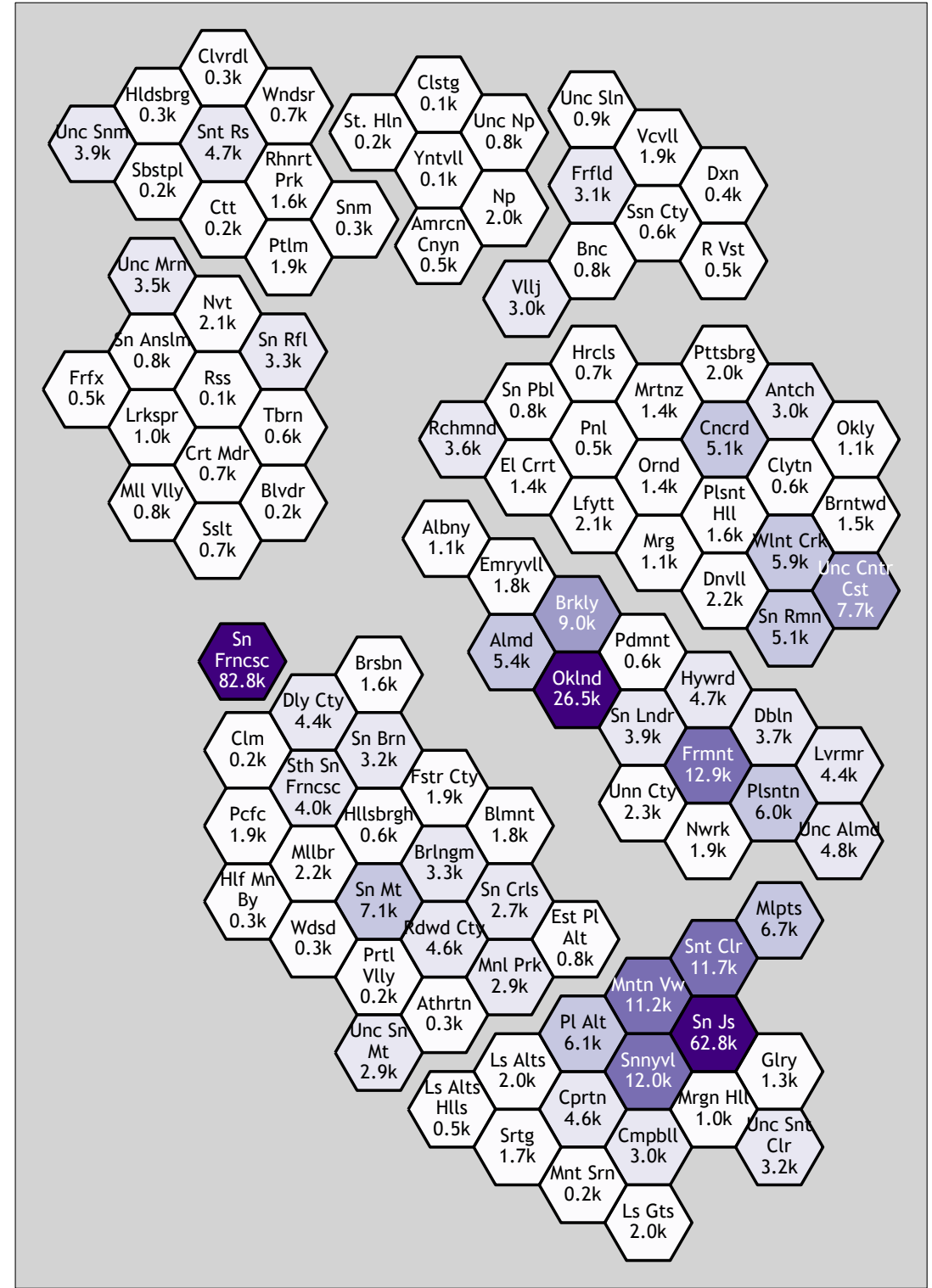
# Appendix 2: Illustrative Results of Proposed RHNA Methodology (Draft Blueprint) and Draft RHNA Methodology (Final Blueprint)

Note: the jurisdiction-specific allocations shown are for illustrative purposes only. ABAG will issue Final Allocations by the end of 2021.

### Proposed RHNA Methodology (Baseline: 2050 Households (Draft Blueprint))



### Draft RHNA Methodology (Baseline: 2050 Households (Final Blueprint))



Jurisdiction Growth (Units)



## Appendix 3: Jurisdiction Illustrative Allocations

### Illustrative Allocations by County

	Draft RHNA Methodology (Final Blueprint)	2015-2023 RHNA (Cycle 5)	Proposed RHNA Methodology (Draft Blueprint)	Draft RHNA Methodology (Final Blueprint)	Bay Area Households (2019)	Bay Area Jobs (2017)
Alameda	88,985	23%	19%	20%	21%	20%
Contra Costa	48,932	11%	10%	11%	14%	10%
Marin	14,380	1%	3%	3%	4%	3%
Napa	3,523	1%	1%	1%	2%	2%
San Francisco	82,840	15%	16%	19%	13%	19%
San Mateo	47,321	9%	11%	11%	10%	10%
Santa Clara	129,927	31%	33%	29%	24%	27%
Solano	11,097	4%	3%	3%	5%	4%
Sonoma	14,171	4%	4%	3%	7%	5%
<b>BAY AREA</b>	<b>441,176</b>	<b>100%</b>	<b>100%</b>	<b>100%</b>	<b>100%</b>	<b>100%</b>

## Jurisdiction Illustrative Allocations by Income Category

Note: the jurisdiction-specific allocations shown are for illustrative purposes only. ABAG will issue Final Allocations by the end of 2021.

Jurisdiction	Jurisdiction Share of 2050 Households*		Proposed RHNA Methodology (Baseline: 2050 Households - Draft Blueprint)					Draft RHNA Methodology (Baseline: 2050 Households - Final Blueprint)					Comparison of Total RHNA	
	Draft Blueprint	Final Blueprint	Very Low Income	Low Income	Moderate Income	Above Moderate Income	Total	Very Low Income	Low Income	Moderate Income	Above Moderate Income	Total	Unit Change from Proposed to Draft	Percent Change from Proposed to Draft
Alameda	0.994%	1.100%	1,318	759	786	2,033	4,896	1,455	837	868	2,246	5,406	510	10%
Albany	0.211%	0.206%	324	187	180	464	1,155	315	182	175	453	1,125	(30)	-3%
Berkeley	1.452%	1.701%	2,148	1,237	1,211	3,134	7,730	2,504	1,441	1,416	3,664	9,025	1,295	17%
Dublin	0.687%	0.705%	1,060	611	547	1,413	3,631	1,085	625	560	1,449	3,719	88	2%
Emeryville	0.399%	0.493%	377	217	249	646	1,489	462	265	308	797	1,832	343	23%
Fremont	2.694%	2.434%	4,040	2,326	2,214	5,728	14,308	3,640	2,096	1,996	5,165	12,897	(1,411)	-10%
Hayward	1.393%	1.571%	980	564	726	1,880	4,150	1,100	632	817	2,115	4,664	514	12%
Livermore	1.130%	1.269%	1,109	639	620	1,606	3,974	1,240	714	696	1,799	4,449	475	12%
Newark	0.578%	0.609%	453	260	303	784	1,800	475	274	318	824	1,891	91	5%
Oakland	6.503%	6.338%	6,880	3,962	4,584	11,860	27,286	6,665	3,838	4,457	11,533	26,493	(793)	-3%
Piedmont	0.099%	0.098%	166	96	94	243	599	163	94	92	238	587	(12)	-2%
Pleasanton	0.909%	1.135%	1,405	810	717	1,855	4,787	1,750	1,008	894	2,313	5,965	1,178	25%
San Leandro	0.913%	1.137%	713	411	561	1,451	3,136	882	507	696	1,802	3,887	751	24%
Unincorporated Alameda	1.347%	1.419%	1,221	704	726	1,879	4,530	1,281	738	763	1,976	4,758	228	5%
Union City	0.702%	0.727%	565	326	370	957	2,218	582	335	382	988	2,287	69	3%
<b>Alameda County</b>	<b>20.011%</b>	<b>20.942%</b>	<b>22,759</b>	<b>13,109</b>	<b>13,888</b>	<b>35,933</b>	<b>85,689</b>	<b>23,599</b>	<b>13,586</b>	<b>14,438</b>	<b>37,362</b>	<b>88,985</b>	<b>3,296</b>	<b>4%</b>
Antioch	1.032%	1.270%	661	380	402	1,038	2,481	811	467	493	1,275	3,046	565	23%
Brentwood	0.618%	0.647%	395	228	237	614	1,474	411	237	247	641	1,536	62	4%
Clayton	0.115%	0.111%	176	102	87	227	592	170	97	84	219	570	(22)	-4%
Concord	1.306%	1.725%	1,006	579	643	1,662	3,890	1,322	762	847	2,190	5,121	1,231	32%
Danville	0.410%	0.424%	632	365	328	848	2,173	652	376	338	875	2,241	68	3%
El Cerrito	0.339%	0.405%	289	166	203	524	1,182	342	197	241	624	1,404	222	19%
Hercules	0.240%	0.264%	164	95	115	297	671	179	104	126	327	736	65	10%
Lafayette	0.297%	0.382%	468	269	255	659	1,651	599	344	326	845	2,114	463	28%
Martinez	0.381%	0.383%	357	205	220	569	1,351	358	206	221	573	1,358	7	1%
Moraga	0.193%	0.204%	302	174	163	422	1,061	318	183	172	445	1,118	57	5%
Oakley	0.395%	0.450%	251	145	152	393	941	286	165	172	446	1,069	128	14%
Orinda	0.197%	0.235%	313	180	181	468	1,142	372	215	215	557	1,359	217	19%
Pinole	0.209%	0.183%	142	82	99	256	579	124	71	87	223	505	(74)	-13%
Pittsburg	0.630%	0.787%	419	242	273	707	1,641	518	298	340	880	2,036	395	24%
Pleasant Hill	0.423%	0.368%	522	300	293	758	1,873	451	261	254	657	1,623	(250)	-13%
Richmond	1.403%	1.227%	988	569	731	1,891	4,179	860	496	638	1,651	3,645	(534)	-13%
San Pablo	0.261%	0.248%	187	108	139	359	793	177	102	132	341	752	(41)	-5%
San Ramon	0.898%	0.975%	1,382	796	708	1,830	4,716	1,497	862	767	1,985	5,111	395	8%
Unincorporated Contra Costa	1.658%	2.203%	1,609	928	917	2,373	5,827	2,131	1,227	1,217	3,147	7,722	1,895	33%
Walnut Creek	1.118%	1.148%	1,655	954	869	2,247	5,725	1,696	976	890	2,304	5,866	141	2%
<b>Contra Costa County</b>	<b>12.124%</b>	<b>13.638%</b>	<b>11,918</b>	<b>6,867</b>	<b>7,015</b>	<b>18,142</b>	<b>43,942</b>	<b>13,274</b>	<b>7,646</b>	<b>7,807</b>	<b>20,205</b>	<b>48,932</b>	<b>4,990</b>	<b>11%</b>

## Jurisdiction Illustrative Allocations by Income Category

Note: the jurisdiction-specific allocations shown are for illustrative purposes only. ABAG will issue Final Allocations by the end of 2021.

Jurisdiction	Jurisdiction Share of 2050 Households*		Proposed RHNA Methodology (Baseline: 2050 Households - Draft Blueprint)					Draft RHNA Methodology (Baseline: 2050 Households - Final Blueprint)					Comparison of Total RHNA	
	Draft Blueprint	Final Blueprint	Very Low Income	Low Income	Moderate Income	Above Moderate Income	Total	Very Low Income	Low Income	Moderate Income	Above Moderate Income	Total	Unit Change from Proposed to Draft	Percent Change from Proposed to Draft
Belvedere	0.033%	0.032%	49	28	23	61	161	49	28	23	60	160	(1)	-1%
Corte Madera	0.135%	0.138%	209	121	106	274	710	213	123	108	281	725	15	2%
Fairfax	0.104%	0.098%	158	91	75	195	519	149	86	71	184	490	(29)	-6%
Larkspur	0.197%	0.189%	303	175	150	390	1,018	291	168	145	375	979	(39)	-4%
Mill Valley	0.161%	0.164%	248	142	124	320	834	252	144	126	326	848	14	2%
Novato	0.669%	0.672%	582	335	332	858	2,107	583	336	332	860	2,111	4	0%
Ross	0.023%	0.022%	35	20	17	44	116	33	19	16	41	109	(7)	-6%
San Anselmo	0.149%	0.167%	226	130	108	280	744	253	145	121	314	833	89	12%
San Rafael	0.895%	1.048%	752	433	446	1,154	2,785	877	504	521	1,350	3,252	467	17%
Sausalito	0.125%	0.125%	200	115	115	296	726	200	115	114	295	724	(2)	0%
Tiburon	0.123%	0.126%	186	107	91	236	620	193	110	93	243	639	19	3%
Unincorporated Marin	0.893%	0.822%	1,157	666	557	1,440	3,820	1,063	611	512	1,324	3,510	(310)	-8%
<b>Marin County</b>	<b>3.507%</b>	<b>3.605%</b>	<b>4,105</b>	<b>2,363</b>	<b>2,144</b>	<b>5,548</b>	<b>14,160</b>	<b>4,156</b>	<b>2,389</b>	<b>2,182</b>	<b>5,653</b>	<b>14,380</b>	<b>220</b>	<b>2%</b>
American Canyon	0.190%	0.176%	124	72	81	209	486	115	67	75	194	451	(35)	-7%
Calistoga	0.090%	0.052%	58	32	33	86	209	32	19	19	50	120	(89)	-43%
Napa	0.815%	0.769%	550	317	339	876	2,082	516	298	319	825	1,958	(124)	-6%
St. Helena	0.073%	0.068%	46	27	27	71	171	43	24	26	66	159	(12)	-7%
Unincorporated Napa	0.288%	0.279%	218	126	125	323	792	210	121	120	312	763	(29)	-4%
Yountville	0.031%	0.029%	20	12	12	32	76	19	11	12	30	72	(4)	-5%
<b>Napa County</b>	<b>1.487%</b>	<b>1.373%</b>	<b>1,016</b>	<b>586</b>	<b>617</b>	<b>1,597</b>	<b>3,816</b>	<b>935</b>	<b>540</b>	<b>571</b>	<b>1,477</b>	<b>3,523</b>	<b>(293)</b>	<b>-8%</b>
<b>San Francisco</b>	<b>12.394%</b>	<b>14.304%</b>	<b>18,637</b>	<b>10,717</b>	<b>11,910</b>	<b>30,816</b>	<b>72,080</b>	<b>21,359</b>	<b>12,294</b>	<b>13,717</b>	<b>35,470</b>	<b>82,840</b>	<b>10,760</b>	<b>15%</b>
Atherton	0.065%	0.072%	74	43	51	130	298	81	47	56	144	328	30	10%
Belmont	0.302%	0.305%	485	280	282	728	1,775	488	281	283	733	1,785	10	1%
Brisbane	0.742%	0.423%	573	330	534	1,382	2,819	324	187	303	785	1,599	(1,220)	-43%
Burlingame	0.572%	0.546%	926	534	555	1,434	3,449	883	509	529	1,368	3,289	(160)	-5%
Colma	0.047%	0.052%	40	24	33	86	183	45	26	37	96	204	21	11%
Daly City	1.040%	0.945%	1,150	661	841	2,175	4,827	1,039	598	762	1,971	4,370	(457)	-9%
East Palo Alto	0.219%	0.206%	179	104	169	437	889	169	97	159	410	835	(54)	-6%
Foster City	0.349%	0.327%	556	320	321	831	2,028	520	299	300	777	1,896	(132)	-7%
Half Moon Bay	0.147%	0.149%	93	54	54	141	342	93	54	54	141	342	-	0%
Hillsborough	0.107%	0.097%	169	97	95	245	606	153	88	87	223	551	(55)	-9%
Menlo Park	0.500%	0.481%	773	445	517	1,340	3,075	740	426	496	1,284	2,946	(129)	-4%
Millbrae	0.375%	0.350%	618	356	386	999	2,359	575	331	361	932	2,199	(160)	-7%
Pacifica	0.359%	0.356%	557	321	294	761	1,933	551	317	291	753	1,912	(21)	-1%
Portola Valley	0.045%	0.045%	70	41	39	101	251	70	40	39	99	248	(3)	-1%
Redwood City	1.102%	0.984%	1,284	739	885	2,291	5,199	1,141	658	789	2,041	4,629	(570)	-11%
San Bruno	0.486%	0.730%	481	278	382	989	2,130	721	415	573	1,483	3,192	1,062	50%
San Carlos	0.398%	0.455%	647	372	383	991	2,393	739	425	438	1,133	2,735	342	14%
San Mateo	1.338%	1.419%	1,722	991	1,111	2,873	6,697	1,819	1,047	1,175	3,040	7,081	384	6%
South San Francisco	0.923%	0.929%	892	513	717	1,856	3,978	892	514	720	1,863	3,989	11	0%
Unincorporated San Mateo	0.827%	0.809%	852	490	443	1,148	2,933	830	479	433	1,121	2,863	(70)	-2%
Woodside	0.057%	0.058%	90	52	51	133	326	90	52	52	134	328	2	1%
<b>San Mateo County</b>	<b>10.002%</b>	<b>9.740%</b>	<b>12,231</b>	<b>7,045</b>	<b>8,143</b>	<b>21,071</b>	<b>48,490</b>	<b>11,963</b>	<b>6,890</b>	<b>7,937</b>	<b>20,531</b>	<b>47,321</b>	<b>(1,169)</b>	<b>-2%</b>

## Jurisdiction Illustrative Allocations by Income Category

Note: the jurisdiction-specific allocations shown are for illustrative purposes only. ABAG will issue Final Allocations by the end of 2021.

Jurisdiction	Jurisdiction Share of 2050 Households*		Proposed RHNA Methodology (Baseline: 2050 Households - Draft Blueprint)					Draft RHNA Methodology (Baseline: 2050 Households - Final Blueprint)					Comparison of Total RHNA	
	Draft Blueprint	Final Blueprint	Very Low Income	Low Income	Moderate Income	Above Moderate Income	Total	Very Low Income	Low Income	Moderate Income	Above Moderate Income	Total	Unit Change from Proposed to Draft	Percent Change from Proposed to Draft
Campbell	0.741%	0.563%	1,017	585	659	1,703	3,964	770	444	499	1,292	3,005	(959)	-24%
Cupertino	0.980%	0.724%	1,619	932	1,023	2,648	6,222	1,193	687	755	1,953	4,588	(1,634)	-26%
Gilroy	0.523%	0.461%	410	236	228	590	1,464	359	207	200	519	1,285	(179)	-12%
Los Altos	0.348%	0.301%	580	333	377	977	2,267	501	288	326	843	1,958	(309)	-14%
Los Altos Hills	0.084%	0.076%	139	81	91	234	545	125	72	82	210	489	(56)	-10%
Los Gatos	0.326%	0.335%	523	301	311	804	1,939	537	310	320	826	1,993	54	3%
Milpitas	1.228%	1.257%	1,653	952	1,108	2,866	6,579	1,685	970	1,131	2,927	6,713	134	2%
Monte Sereno	0.032%	0.032%	51	30	31	80	192	51	30	31	79	191	(1)	-1%
Morgan Hill	0.444%	0.410%	291	168	189	488	1,136	268	155	174	450	1,047	(89)	-8%
Mountain View	1.772%	1.754%	2,876	1,656	1,909	4,939	11,380	2,838	1,635	1,885	4,880	11,238	(142)	-1%
Palo Alto	1.541%	0.935%	2,573	1,482	1,673	4,330	10,058	1,556	896	1,013	2,621	6,086	(3,972)	-39%
San Jose	15.242%	14.426%	16,391	9,437	11,344	29,350	66,522	15,444	8,892	10,711	27,714	62,761	(3,761)	-6%
Santa Clara	2.184%	2.135%	3,020	1,739	2,031	5,257	12,047	2,940	1,692	1,981	5,126	11,739	(308)	-3%
Saratoga	0.343%	0.280%	556	321	341	882	2,100	454	261	278	719	1,712	(388)	-18%
Sunnyvale	2.262%	2.088%	3,227	1,858	2,206	5,707	12,998	2,968	1,709	2,032	5,257	11,966	(1,032)	-8%
Unincorporated Santa Clara	1.065%	0.815%	1,113	641	664	1,719	4,137	848	488	508	1,312	3,156	(981)	-24%
<b>Santa Clara County</b>	<b>29.114%</b>	<b>26.591%</b>	<b>36,039</b>	<b>20,752</b>	<b>24,185</b>	<b>62,574</b>	<b>143,550</b>	<b>32,537</b>	<b>18,736</b>	<b>21,926</b>	<b>56,728</b>	<b>129,927</b>	<b>(13,623)</b>	<b>-9%</b>
Benicia	0.286%	0.271%	222	127	143	370	862	208	120	135	351	814	(48)	-6%
Dixon	0.159%	0.146%	103	58	62	159	382	93	54	57	146	350	(32)	-8%
Fairfield	1.438%	1.226%	938	540	596	1,544	3,618	796	458	508	1,314	3,076	(542)	-15%
Rio Vista	0.098%	0.207%	62	36	36	94	228	130	75	76	197	478	250	110%
Suisun City	0.242%	0.246%	158	91	101	260	610	160	92	101	264	617	7	1%
Unincorporated Solano	0.420%	0.381%	270	155	165	426	1,016	243	140	149	385	917	(99)	-10%
Vacaville	0.828%	0.775%	535	308	328	848	2,019	498	286	305	791	1,880	(139)	-7%
Vallejo	1.190%	1.117%	794	457	535	1,385	3,171	741	426	501	1,297	2,965	(206)	-6%
<b>Solano County</b>	<b>4.662%</b>	<b>4.368%</b>	<b>3,082</b>	<b>1,772</b>	<b>1,966</b>	<b>5,086</b>	<b>11,906</b>	<b>2,869</b>	<b>1,651</b>	<b>1,832</b>	<b>4,745</b>	<b>11,097</b>	<b>(809)</b>	<b>-7%</b>
Cloverdale	0.126%	0.120%	80	46	47	121	294	76	44	45	116	281	(13)	-4%
Cotati	0.105%	0.092%	68	39	44	116	267	61	35	39	101	236	(31)	-12%
Healdsburg	0.145%	0.121%	93	54	59	153	359	78	45	49	128	300	(59)	-16%
Petaluma	0.781%	0.716%	560	323	342	885	2,110	511	295	313	810	1,929	(181)	-9%
Rohnert Park	0.492%	0.625%	322	186	209	541	1,258	408	235	265	686	1,594	336	27%
Santa Rosa	2.404%	1.745%	1,727	993	1,064	2,754	6,538	1,247	718	771	1,995	4,731	(1,807)	-28%
Sebastopol	0.163%	0.086%	106	61	67	175	409	56	32	35	92	215	(194)	-47%
Sonoma	0.143%	0.133%	91	53	54	140	338	85	49	50	130	314	(24)	-7%
Unincorporated Sonoma	2.058%	1.540%	1,424	820	840	2,173	5,257	1,060	610	627	1,622	3,919	(1,338)	-25%
Windsor	0.283%	0.260%	184	106	118	305	713	168	97	108	279	652	(61)	-9%
<b>Sonoma County</b>	<b>6.700%</b>	<b>5.440%</b>	<b>4,655</b>	<b>2,681</b>	<b>2,844</b>	<b>7,363</b>	<b>17,543</b>	<b>3,750</b>	<b>2,160</b>	<b>2,302</b>	<b>5,959</b>	<b>14,171</b>	<b>(3,372)</b>	<b>-19%</b>
	<b>100.000%</b>	<b>100.000%</b>	<b>114,442</b>	<b>65,892</b>	<b>72,712</b>	<b>188,130</b>	<b>441,176</b>	<b>114,442</b>	<b>65,892</b>	<b>72,712</b>	<b>188,130</b>	<b>441,176</b>		

\* Jurisdiction-level forecasts from Plan Bay Area 2050 Final Blueprint are intended solely for use in crafting the RHNA baseline allocation; official Plan Bay Area 2050 growth pattern focuses on county- and subcounty-level forecasts.

#### Appendix 4: Performance Evaluation Metrics

The RHNA allocation methodology must meet five objectives identified in Housing Element Law.<sup>1</sup> To help ensure that any proposed methodology will meet the statutory RHNA objectives and receive approval from the California Department of Housing and Community Development (HCD), ABAG-MTC staff developed a set of evaluation metrics to assess different methodology options. These metrics are based largely on the analytical framework used by HCD in evaluating the draft methodologies completed by other regions in California, as evidenced by the approval letters HCD provided to the Sacramento Area Council of Governments (SACOG), San Diego Association of Governments (SANDAG), and Southern California Association of Governments (SCAG).<sup>2</sup> Other metrics reflect input from members of the [Housing Methodology Committee](#) (HMC).

In the evaluation metrics, each statutory objective has been reframed as a question that reflects the language Housing Element Law uses to define the objectives. Each statutory objective is accompanied by quantitative metrics for evaluating the allocation produced by a methodology. The metrics are structured as a comparison between the allocations to the top jurisdictions in the region for a particular characteristic – such as jurisdictions with the most expensive housing costs – and the allocations to the rest of the jurisdictions in the region.

#### Metrics Based on Lower-Income Unit Percentage vs. Metrics Based on Total Allocation

Several of the metrics focus on whether jurisdictions with certain characteristics receive a significant share of their RHNA as *lower-income units*. These metrics reflect HCD's analysis in its letters evaluating RHNA methodologies from other regions. However, HMC members advocated for metrics that also examine *the total number of units* assigned to a jurisdiction. These HMC members asserted that it is ultimately less impactful if a jurisdiction receives a high share of its RHNA as lower-income units if that same jurisdiction receives few units overall. Accordingly, each metric that focuses on the share of lower-income units assigned to jurisdictions with certain characteristics is paired with a complementary metric that examines whether those jurisdictions also receive a share of the regional housing need that is at least proportional to their share of the region's households. A value of 1.0 for these complementary metrics means that the group of jurisdictions' overall share of RHNA is proportional relative to its overall share of households in 2019, while a value below 1.0 is less than proportional.

#### Evaluation of Draft RHNA Methodology Compared to Proposed RHNA Methodology

The graphs below compare the performance of the Draft RHNA Methodology and Proposed RHNA Methodology in achieving the five statutory RHNA objectives based on the evaluation metrics. Although there are some variations on individual metrics, the results indicate that both the Proposed RHNA Methodology and the Draft RHNA Methodology perform well in advancing all of the statutory objectives.

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<sup>1</sup> See [California Government Code Section 65584\(d\)](#).

<sup>2</sup> For copies of letters HCD sent to other regions, see [this document](#) from the January 2020 HMC meeting agenda packet.



**OBJECTIVE 1: Does the allocation increase the housing supply and the mix of housing types, tenure, and affordability in all cities and counties within the region in an equitable manner?**

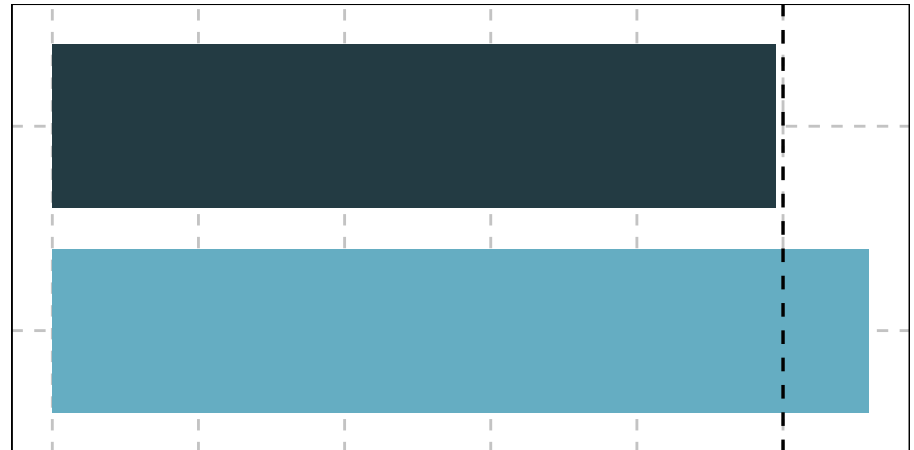
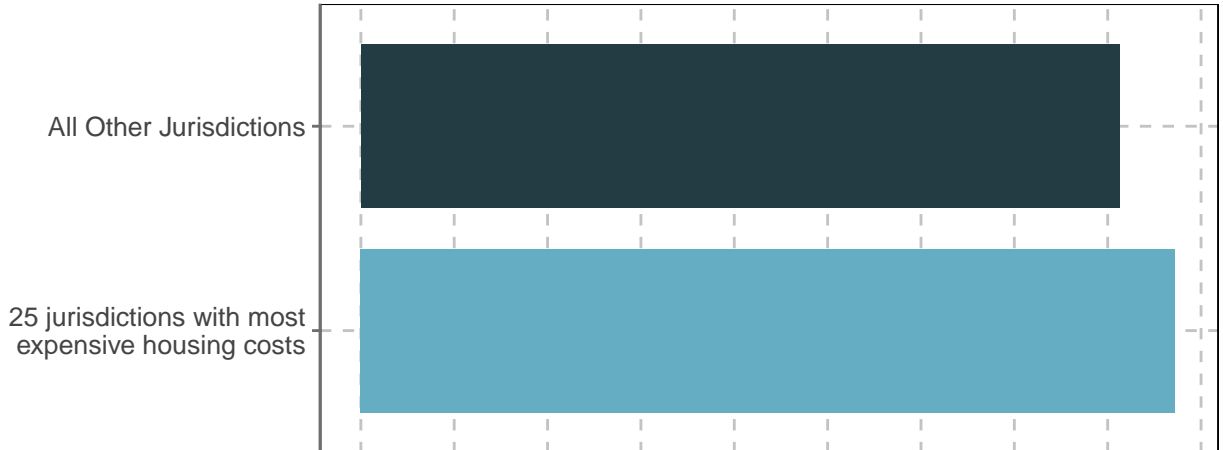
*Comparison between the top 25 jurisdictions with the most expensive housing costs and the rest of the region*

**METRIC 1a.1: Do jurisdictions with the most expensive housing costs receive a significant percentage of their RHNA as lower-income units?**

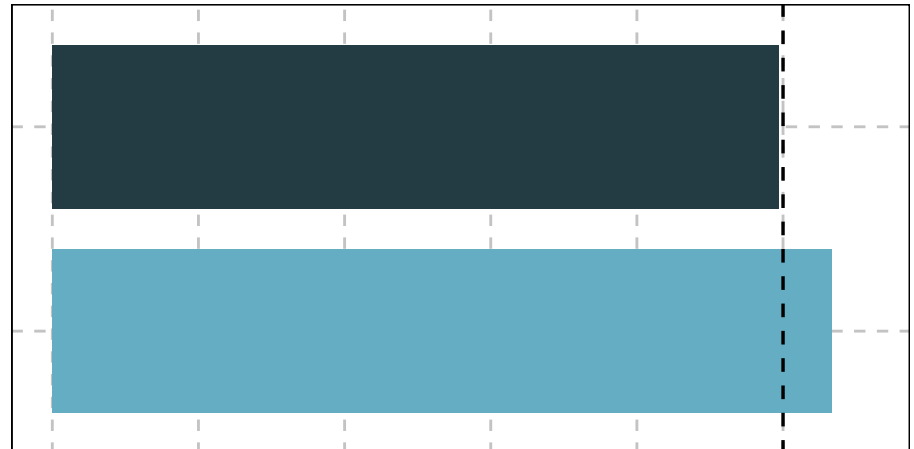
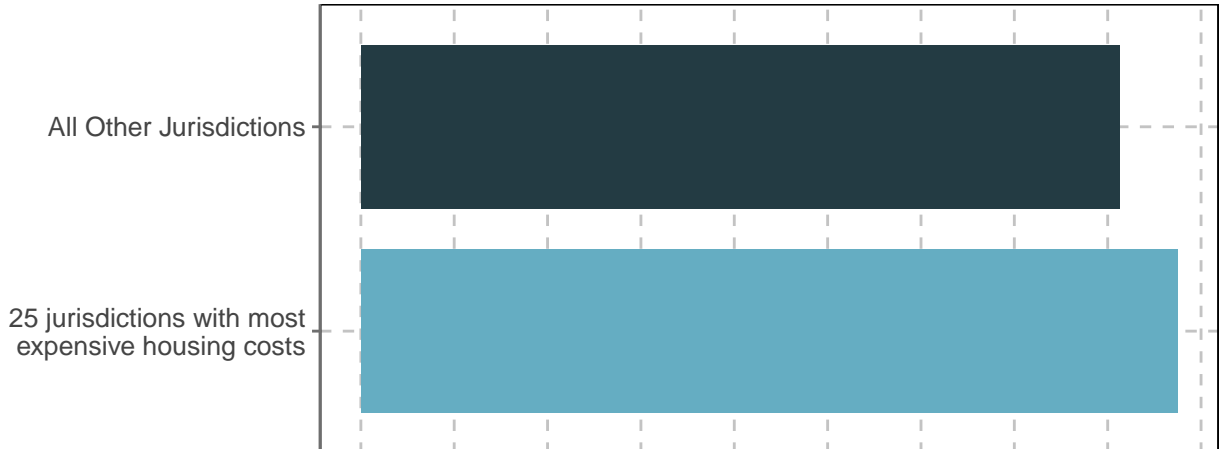
**METRIC 1a.2: Do jurisdictions with the most expensive housing costs receive a share of the region's housing need that is at least proportional to their share of the region's households?**

**Percent of RHNA as lower income units**

**Ratio of share of total RHNA to share of region's households**



**Proposed RHNA Methodology  
(2050 Households – Draft Blueprint)**



**Draft RHNA Methodology  
(2050 Households – Final Blueprint)**

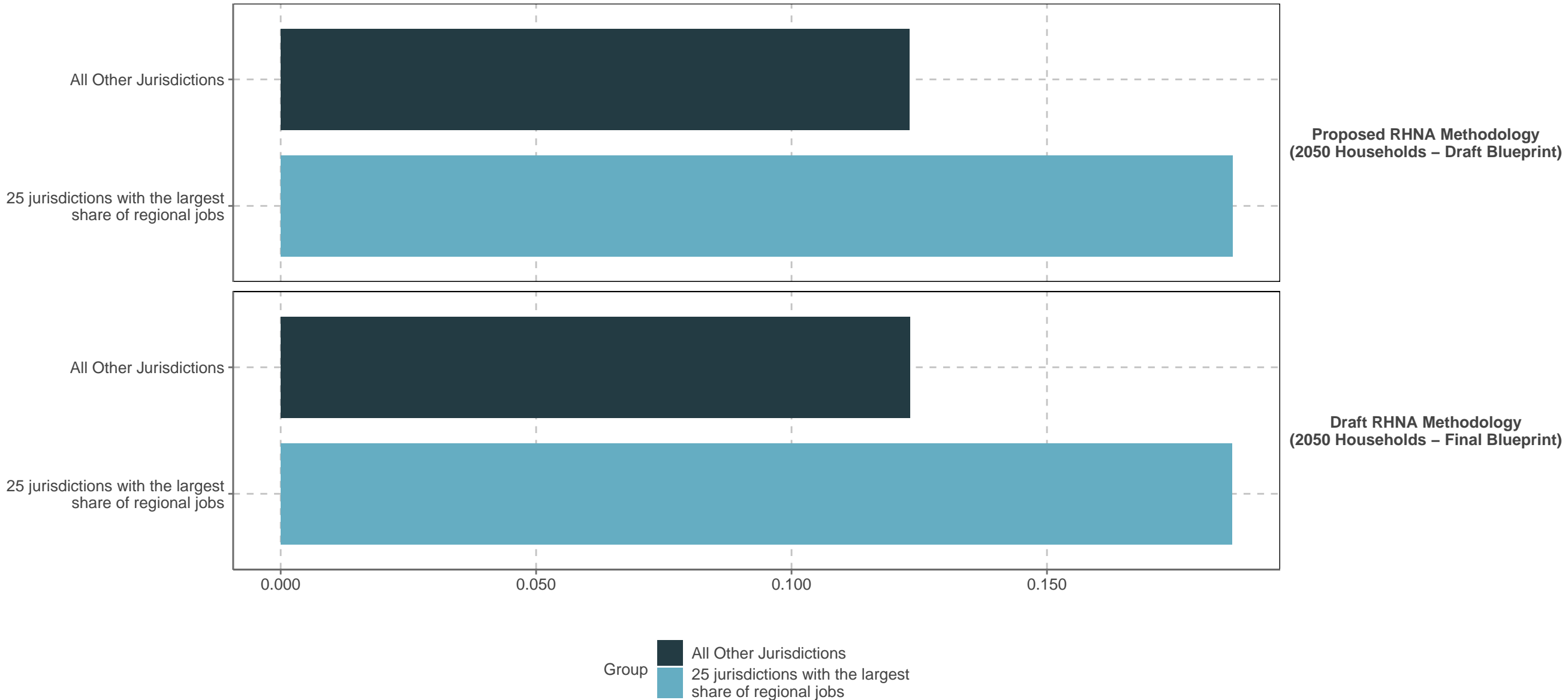
Group  
 All Other Jurisdictions  
 25 jurisdictions with most expensive housing costs

**OBJECTIVE 2: Does the allocation promote infill development and socioeconomic equity, the protection of environmental and agricultural resources, the encouragement of efficient development patterns, and the achievement of the region's greenhouse gas reductions targets?**

*Comparison between the top 25 jurisdictions with the most jobs and the rest of the region*

**METRIC 2a: Do jurisdictions with the largest share of the region's jobs have the highest growth rates resulting from RHNA?**

**Average growth rate resulting from RHNA**



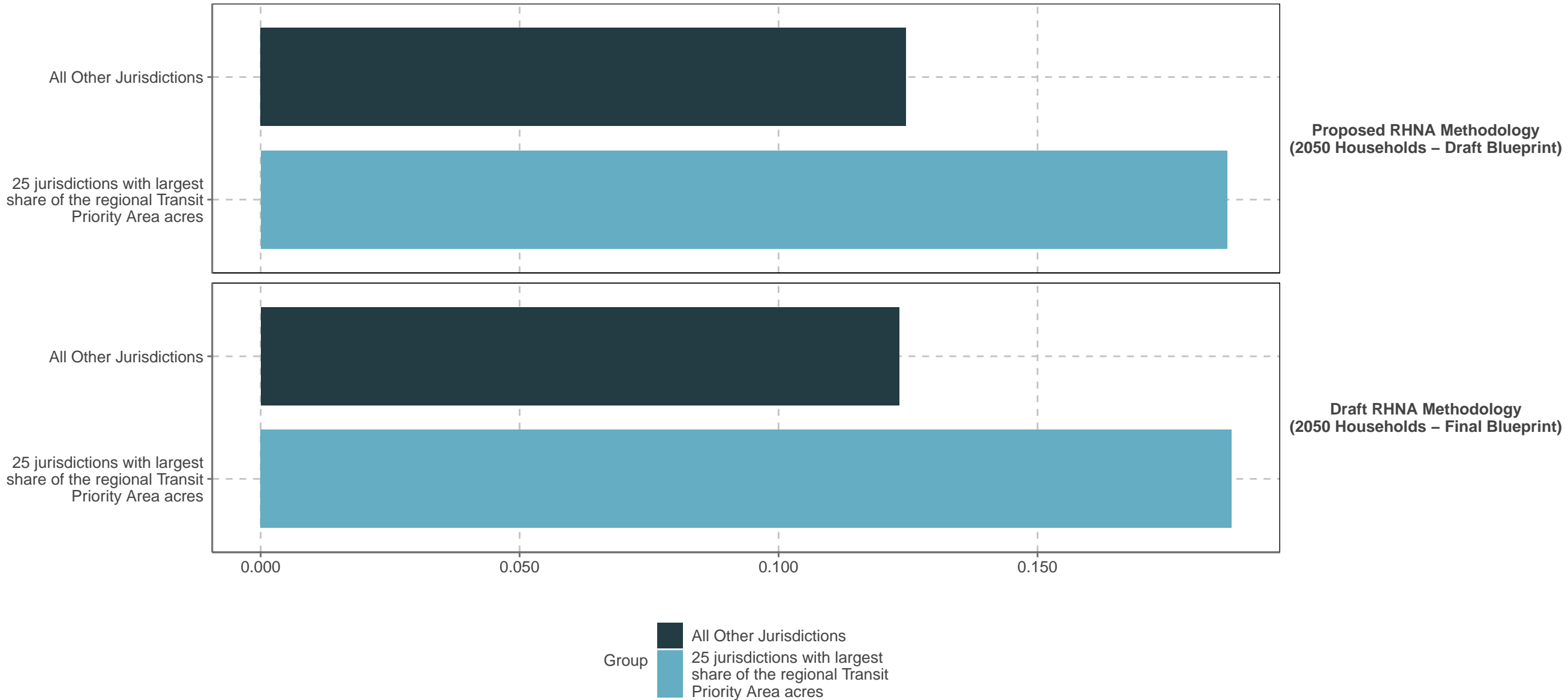


**OBJECTIVE 2: Does the allocation promote infill development and socioeconomic equity, the protection of environmental and agricultural resources, the encouragement of efficient development patterns, and the achievement of the region's greenhouse gas reductions targets?**

*Comparison between the top 25 jurisdictions with the most transit access and the rest of the region*

**METRIC 2b: Do jurisdictions with the largest share of the region's Transit Priority Area acres have the highest growth rates resulting from RHNA?**

**Average growth rate resulting from RHNA**

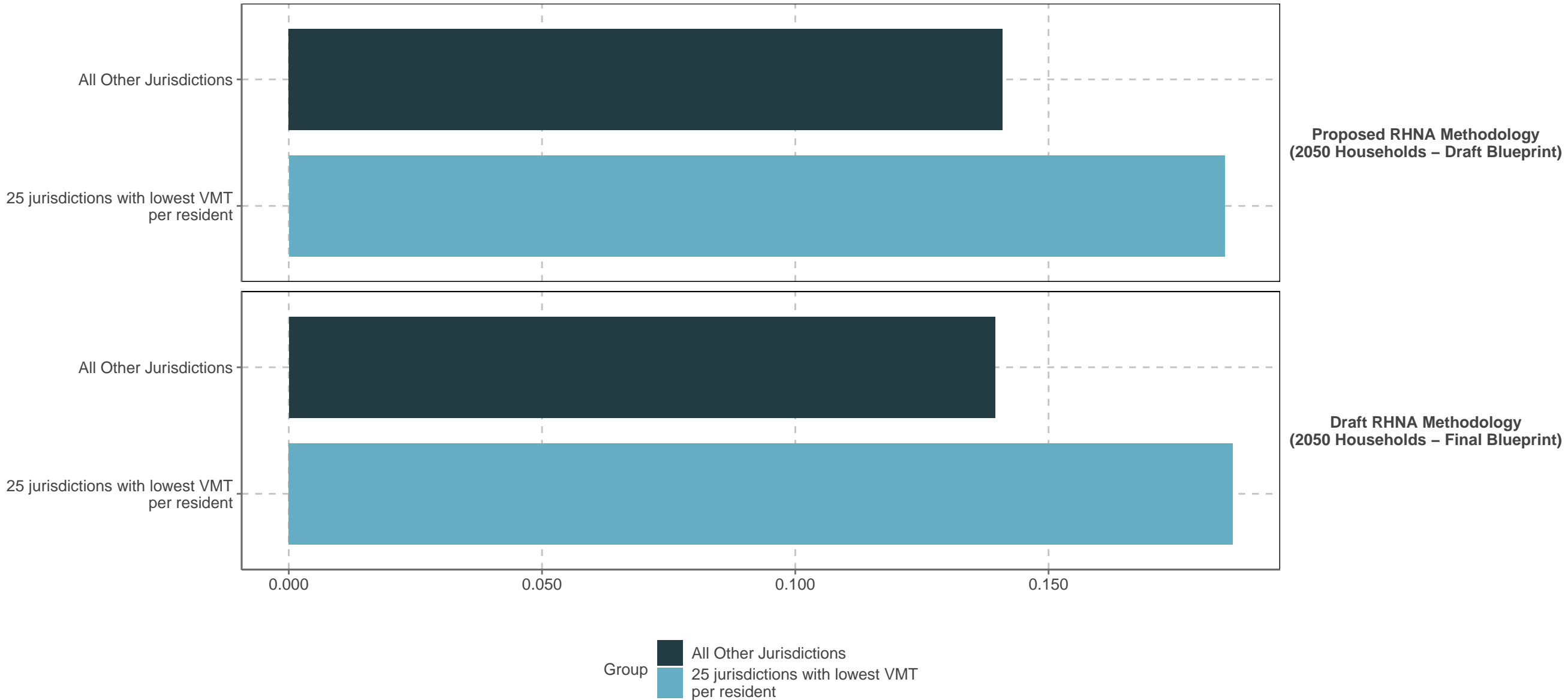


**OBJECTIVE 2: Does the allocation promote infill development and socioeconomic equity, the protection of environmental and agricultural resources, the encouragement of efficient development patterns, and the achievement of the region's greenhouse gas reductions targets?**

*Comparison between the top 25 jurisdictions with the lowest VMT per resident the rest of the region*

**METRIC 2c: Do jurisdictions whose residents drive the least have the highest growth rates resulting from RHNA?**

**Average growth rate resulting from RHNA**



**OBJECTIVE 3: Does the allocation promote an improved intraregional relationship between jobs and housing, including an improved balance between the number of low-wage jobs and the number of housing units affordable to low-wage workers in each jurisdiction?**

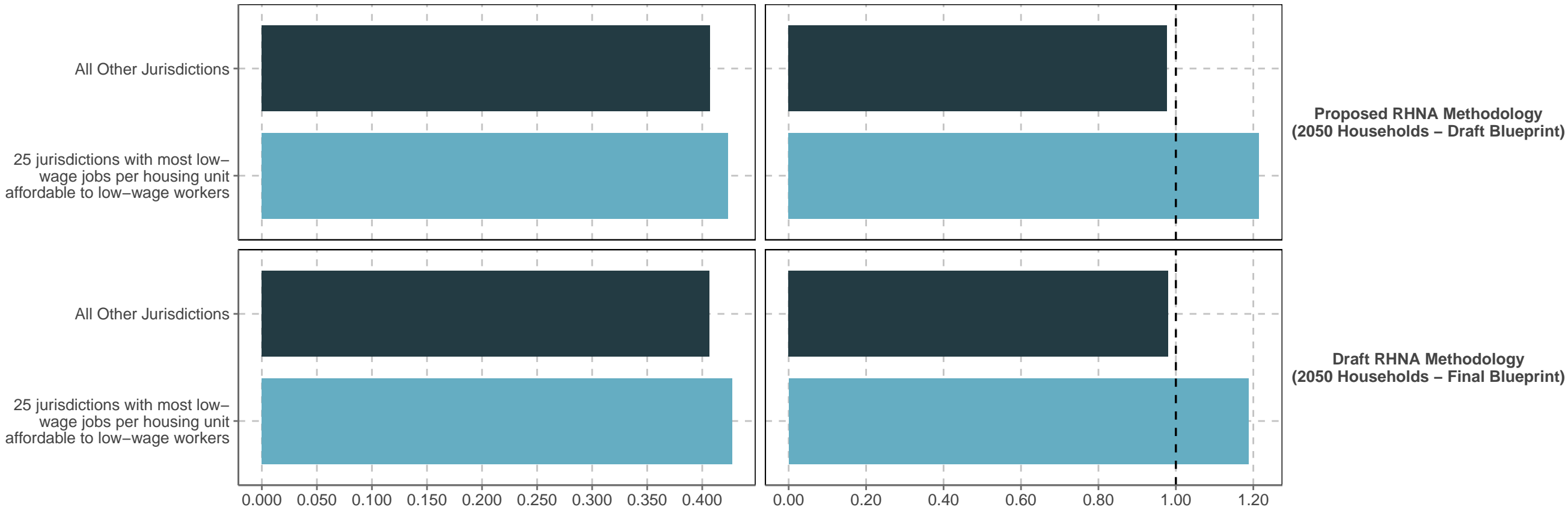
*Comparison between the top 25 jurisdictions with the most unbalanced jobs-housing fit and the rest of the region*

**METRIC 3a.1: Do jurisdictions with the most low-wage workers per housing unit affordable to low-wage workers receive a significant percentage of their RHNA as lower-income units?**

**METRIC 3a.2: Do jurisdictions with the most low-wage workers per housing unit affordable to low-wage workers receive a share of the region's housing need that is at least proportional to their share of the region's households?**

**Percent of RHNA as lower income units**

**Ratio of share of total RHNA to share of region's households**



Group

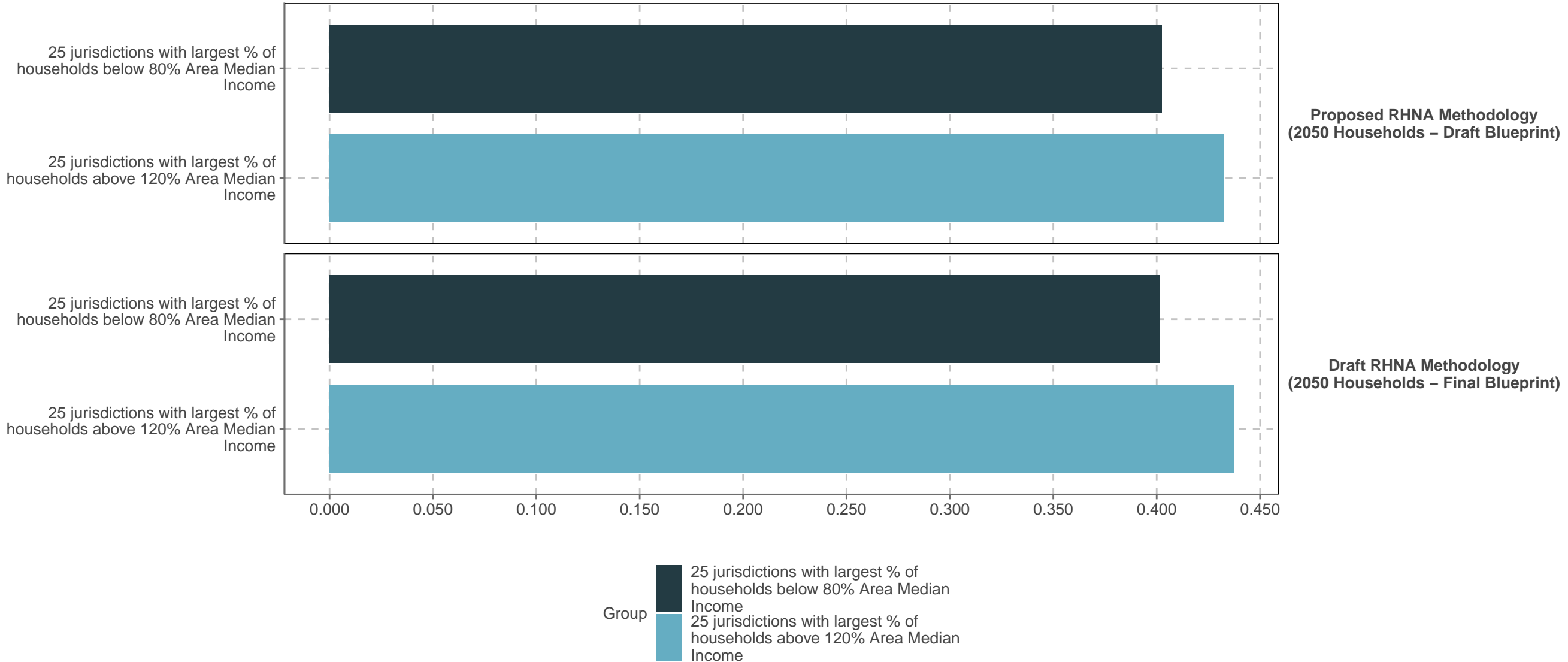
- All Other Jurisdictions
- 25 jurisdictions with most low-wage jobs per housing unit affordable to low-wage workers

**OBJECTIVE 4: Does the allocation direct a lower proportion of housing need to an income category when a jurisdiction already has a disproportionately high share of households in that income category?**

*Comparison between the top 25 most disproportionately high-income jurisdictions and top 25 most disproportionately low-income jurisdictions*

**METRIC 4: Do jurisdictions with the largest percentage of high-income residents receive a larger share of their RHNA as lower-income units than jurisdictions with the largest percentage of low-income residents?**

**Percent of RHNA as lower income units**



**OBJECTIVE 5: Does the allocation affirmatively further fair housing?**

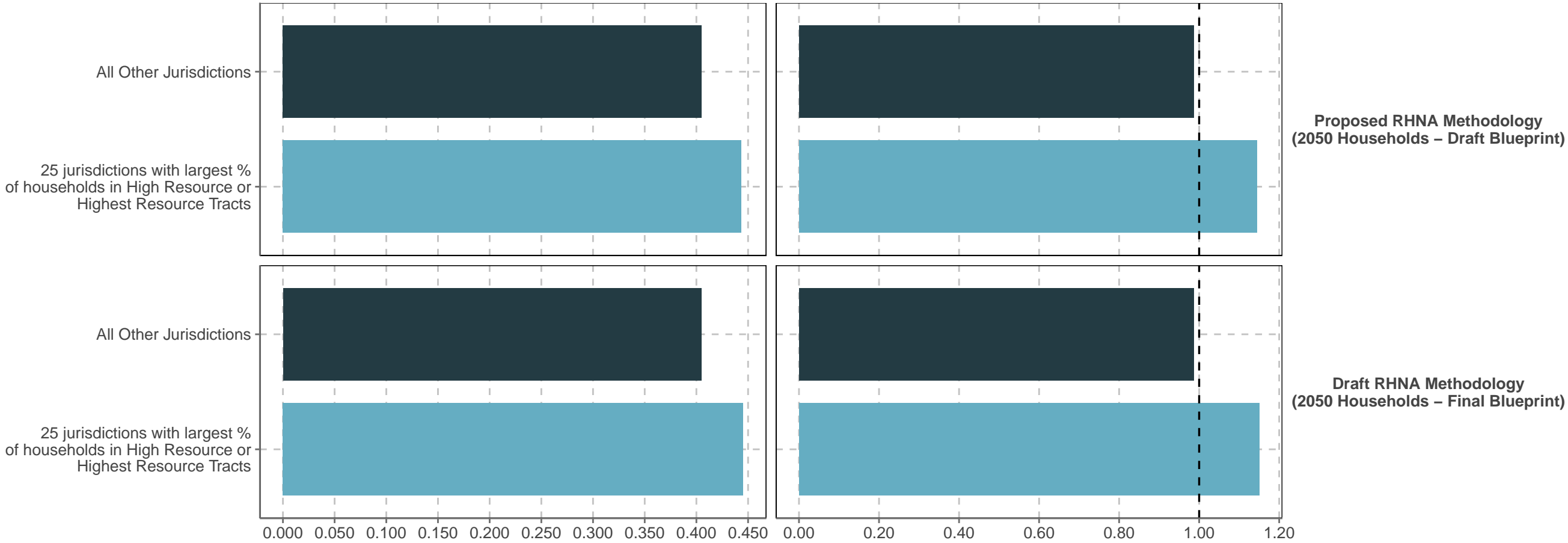
*Comparison between the top 25 jurisdictions with the most access to resources and the rest of the region*

**METRIC 5a.1: Do jurisdictions with the largest percentage of households living in High or Highest Resource tracts receive a significant percentage of their RHNA as lower-income units?**

**METRIC 5a.2: Do jurisdictions with the largest percentage of households living in High or Highest Resource tracts receive a share of the region's housing need that is at least proportional to their share of the region's households?**

**Percent of RHNA as lower income units**

**Ratio of share of total RHNA to share of region's households**



Group

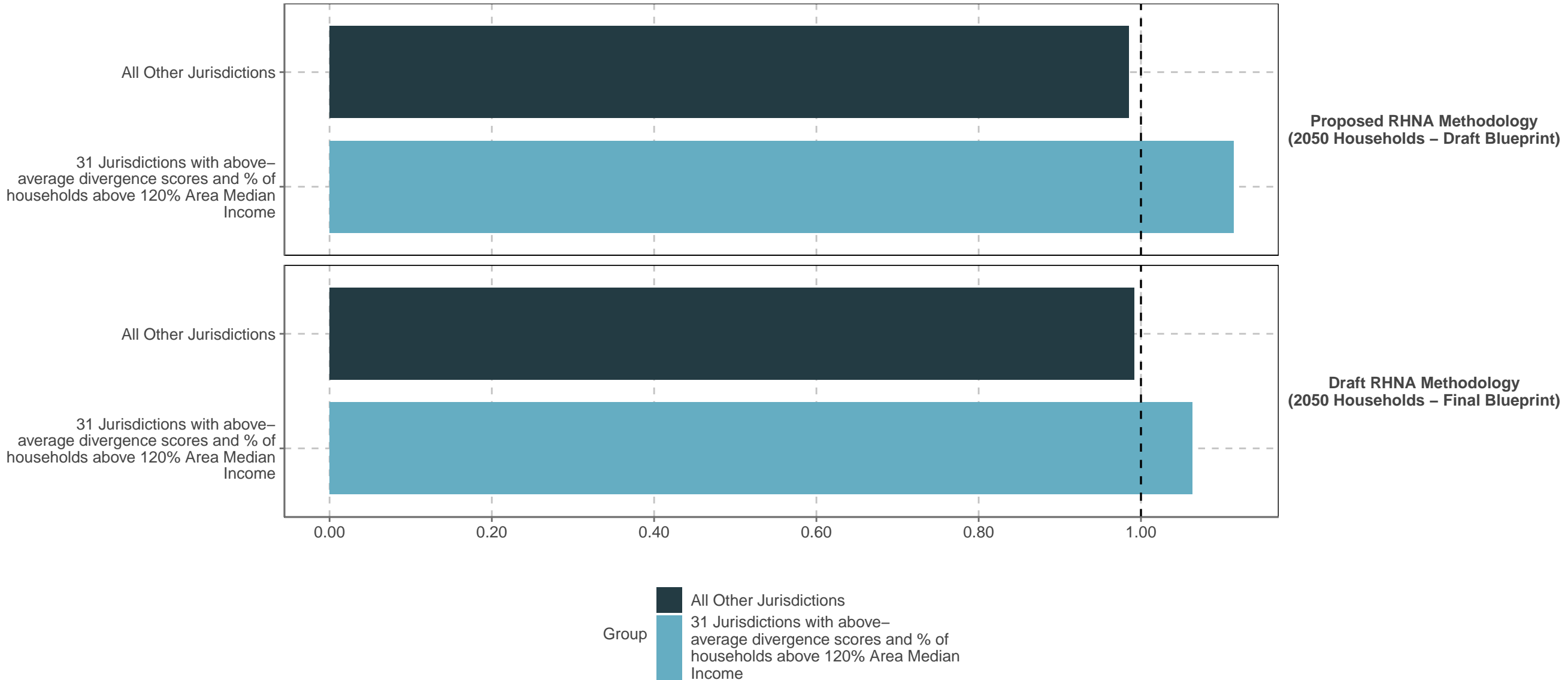
- All Other Jurisdictions
- 25 jurisdictions with largest % of households in High Resource or Highest Resource Tracts

**OBJECTIVE 5: Does the allocation affirmatively further fair housing?**

*Comparison between jurisdictions that have both above-average divergence scores and disproportionately large shares of high-income residents and the rest of the region*

**METRIC 5b: Do jurisdictions exhibiting racial and economic exclusion receive a share of the region's housing need that is at least proportional to their share of the region's households?**

**Ratio of share of total RHNA to share of region's households**

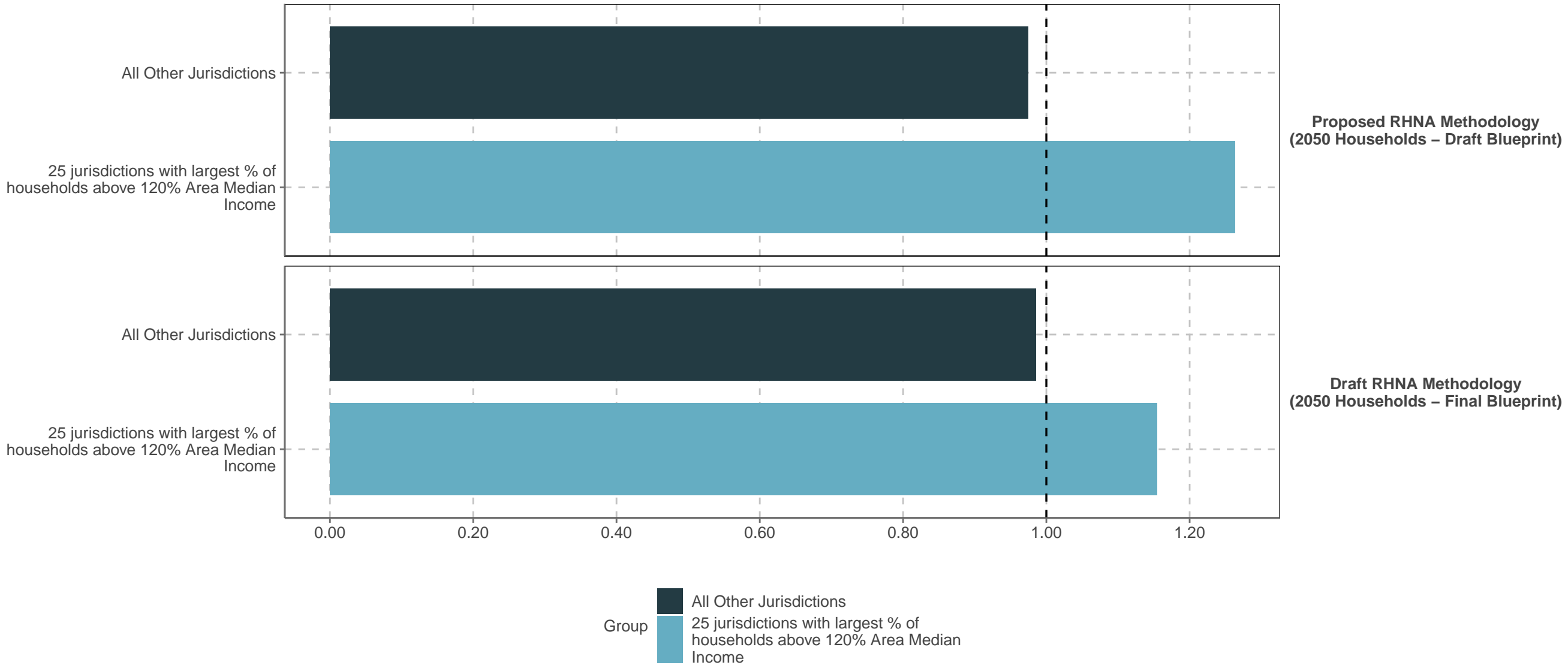


**OBJECTIVE 5: Does the allocation affirmatively further fair housing?**

*Comparison between the top 25 most disproportionately high-income jurisdictions and the rest of the region*

**METRIC 5c: Do jurisdictions with the largest percentage of high-income residents receive a share of the region's housing need that is at least proportional to their share of the region's households?**

**Ratio of share of total RHNA to share of region's households**



**OBJECTIVE 5: Does the allocation affirmatively further fair housing?**

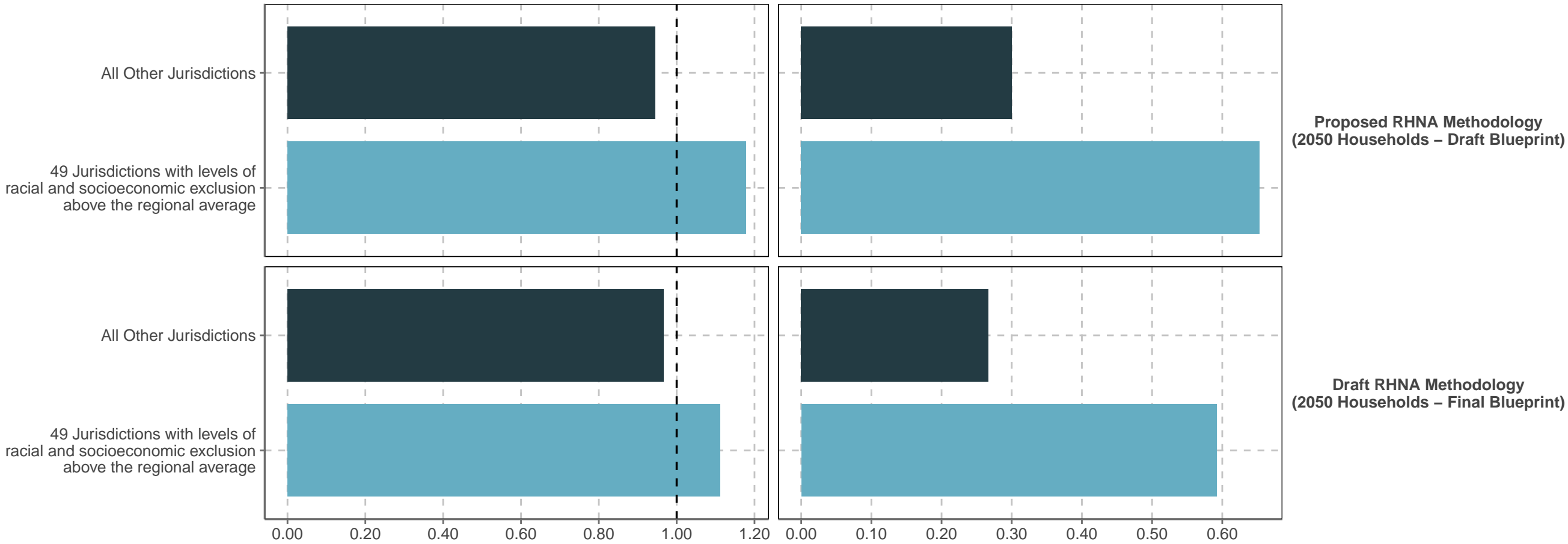
*Comparison between the top 49 jurisdictions exhibiting above average racial and socioeconomic exclusion and the rest of the region*

**METRIC 5d.1: Do jurisdictions with levels of racial and socioeconomic exclusion above the regional average receive a total share of the region's very low- and low-income housing need that is at least proportional to their total share of the region's households?**

**METRIC 5d.2: Does each jurisdiction exhibiting racial and socioeconomic exclusion above the regional average receive a share of the region's very low- and low-income housing need that is at least proportional to its total share of the region's households?**

**Ratio of share of lower-income RHNA to share of region's households**

**Jurisdictions receiving at least a proportional lower-income allocation**



Group

- All Other Jurisdictions
- 49 Jurisdictions with levels of racial and socioeconomic exclusion above the regional average



## Appendix 5: Final Subregional Shares

State Housing Element Law allows two or more neighboring jurisdictions to form a “subregion” to conduct a parallel RHNA process to allocate the subregion’s housing need among its members.<sup>1</sup> A subregion is responsible for conducting its own RHNA process that meets all of the statutory requirements related to process and outcomes, including developing its own RHNA methodology, allocating a share of need to each member jurisdiction, and conducting its own appeals process.

For the 2023–31 RHNA, subregions were formed in:

1. **Napa County:** includes City of American Canyon, City of Napa, Town of Yountville, and the County of Napa (*does not include City of Calistoga or City of St. Helena*)
2. **Solano County:** includes City of Benicia, City of Dixon, City of Fairfield, City of Rio Vista, City of Suisun City, City of Vacaville, City of Vallejo, and County of Solano

ABAG must assign each subregion a share of the Bay Area’s Regional Housing Need Determination (RHND), which represents the total number of units, by income category, the subregion must allocate to its member jurisdictions. Each subregion’s portion of the RHND has been removed from the units allocated by ABAG’s process for the rest of the region’s jurisdictions.

On May 21, 2020, the ABAG Executive Board adopted the methodology for assigning a subregion its share of the RHND. The adopted methodology stipulates that the share of the RHND for each subregion will be based on the sum of the default allocations, by income category, from the ABAG RHNA methodology for each jurisdiction in the subregion. Using ABAG’s RHNA methodology as the input into the subregion shares ensures every jurisdiction that is a member of a subregion receives the same allocation it would have received if it were not part of a subregion. This approach ensures that formation of a subregion does not confer any harm or benefit to member jurisdictions or to other jurisdictions in the region.

On October 15, 2020, the ABAG Executive Board approved release of the Draft Subregional Shares.<sup>2</sup> The Draft Subregional Shares were based on the Proposed RHNA Methodology, which reflected baseline data on 2050 households from the Plan Bay Area 2050 Draft Blueprint. Applying the subregional share methodology to the Bay Area’s RHND of 441,176, the Draft Subregional Share for the Napa County subregion is 0.78 percent of the region’s housing needs and the Draft Subregional Share for the Solano County subregion is 2.7 percent of the region’s housing needs. **Table 1** shows each subregion’s draft share by income category.

---

<sup>1</sup> [Government Code Section 65584.03.](#)

<sup>2</sup> For more information, see <https://mtc.legistar.com/LegislationDetail.aspx?ID=4665721&GUID=6B565EC3-A706-4695-8A87-277F6791A1DB&Options=&Search=>

**Table 1: Draft Subregional Shares, Total Units by Income Category**

<b>Subregion</b>	<b>Very Low</b>	<b>Low</b>	<b>Moderate</b>	<b>Above Moderate</b>	<b>TOTAL</b>
Napa County	912	527	557	1,440	3,436
Solano County	3,082	1,772	1,966	5,086	11,906

Housing Element Law requires ABAG to hold a public comment period and conduct at least one public hearing to receive comments on the Draft Subregional Shares<sup>3</sup> prior to adoption of the Final Subregional Shares. The written public comment period began on October 25 and ended on November 27 per the Notice of Public Hearing published in newspapers and an ABAG press release. Additionally, ABAG held a public hearing at the November 12 meeting of the Regional Planning Committee. ABAG received no comments on the Draft Subregional Shares.

The Final Subregional Shares are based on the Draft RHNA Methodology, which incorporates updates made throughout fall 2020 to reflect the revised Strategies and Growth Geographies approved by the ABAG Executive Board and Commission in September 2020 for the Final Blueprint. Integrating the updated data about future year 2050 households from the Final Blueprint into the Draft RHNA Methodology results in changes to the allocations to local jurisdictions, and thus the subregional shares.

In December 2020, the jurisdictions who were members of the Napa Subregion decided to dissolve their subregion. As a result, these jurisdictions will participate in the RHNA process ABAG is conducting and will receive allocations based on the RHNA methodology adopted by ABAG. Accordingly, ABAG-MTC staff has only identified a Final Subregional Share for the Solano County subregion. Applying the subregional share methodology to the Bay Area's RHND of 441,176, the Final Subregional Share for the Solano County subregion is 2.52 percent of the region's housing needs. **Table 2** shows the subregion's final share by income category.

**Table 2: Final Subregional Shares, Total Units by Income Category**

<b>Subregion</b>	<b>Very Low</b>	<b>Low</b>	<b>Moderate</b>	<b>Above Moderate</b>	<b>TOTAL</b>
Solano County	2,869	1,651	1,832	4,745	11,097

<sup>3</sup> [California Government Code 65584.03 \(c\)](#)

**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](mailto:megan.kirkeby@hcd.ca.gov) or Tom Brinkhuis, Housing Policy Specialist at (916) 263-6651 or [tom.brinkhuis@hcd.ca.gov](mailto: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
<b>Total</b>	<b>100.0%</b>	<b>441,176</b>
* 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

<b>ABAG: PROJECTION PERIOD (8.5 years)</b>		
<b>HCD Determined Population, Households, &amp; Housing Unit Need</b>		
Reference No.	Step Taken to Calculate Regional Housing Need	Amount
1.	<b>Population: December 31 2030 (DOF June 30 2030 projection adjusted + 6 months to December 31 2030)</b>	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.	<b>Household (HH) Population</b>	8,159,280
4.	<b>Projected Households</b>	<b>3,023,735</b>
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
<b>Total</b>	<b>6<sup>th</sup> Cycle Regional Housing Need Assessment (RHNA)</b>	<b>441,176</b>

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.

**From:** [herb](#)  
**To:** [Planning Commission](#)  
**Cc:** [Council, City](#); [Clerk, City](#)  
**Subject:** May 12, 2021 Planning and Transportation Commission Meeting, Item #4: 855 El Camino Real [20PLN-00252]  
**Date:** Sunday, May 9, 2021 6:05:05 PM

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

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Herb Borock  
P. O. Box 632  
Palo Alto, CA 94302

May 9, 2021

Planning and Transportation Commission  
City of Palo Alto, CA 94301  
250 Hamilton Avenue  
Palo Alto, CA 94301

**MAY 12, 2021 PLANNING AND TRANSPORTATION COMMISSION MEETING  
AGENDA ITEM #4: 855 EL CAMINO REAL [20PLN-00252]**

Dear Planning and Transportation Commission:

I understand that this email letter is being forwarded to you automatically before City staff has an opportunity to delete my name and contact information as they did to all public letters attached to the staff report for this agenda item that appear on the City's web site, while the staff didn't delete the same information from the applicant's letters.

There is no justification for staff's deletions of the public's names and contact information from information posted on the Internet, unless the person is a public official, in which case only the contact information can be deleted if the person so requests, but the person's name cannot be deleted.

The project is not exempt from the California Environmental Quality Act for the reasons stated in my May 21, 2021 letter to the City Council, an unredacted copy of which is forwarded to you with today's letter.

The site development standards and allowable uses for a zone district, including a site-specific Planned Community zone district, are the result of a balancing of interests.

Zone district uses or site development regulations should not be changed whenever a property owner wants to earn a higher return on an investment.

When rental prices escalate for a particular use, a property owner is not required to leave a portion of a site vacant so that they can earn the same return they did prior to the price escalation.

The staff report at Packet Page 37 shows an example of how 15,000 square feet at the subject site can be allocated for



medical uses.

If you allow the proposed change of use, you should limit the new allowable use to store fronts vacant at the time the property owner first applied for the change to the language of the Zoning Ordinance.

Otherwise, the property owner can simply raise the rent for Trader Joe's, for example, to force that grocery store to leave and then replace all but a small portion of Trader Joe's facing Embarcadero Road with medical uses.

This project application provides a lesson for anyone considering allowing ground floor retail as part of an otherwise all-residential affordable housing project.

If you follow the example of this application, any ground floor retail use included in such a housing project today could become an office use tomorrow.

Thank you for your consideration of these comments.

Sincerely,

Herb Borock

---

**From:** herb

**Sent:** Monday, March 22, 2021 12:28 AM

**To:** city.council@cityofpaloalto.org <city.council@cityofpaloalto.org>; city.clerk@cityofpaloalto.org <city.clerk@cityofpaloalto.org>

**Subject:** March 22, 2021 Council Meeting, Item #3: 855 El Camino Real (20PLN-00252)

Herb Borock  
P. O. Box 632  
Palo Alto, CA 94302

March 21, 2021

Palo Alto City Council  
250 Hamilton Avenue  
Palo Alto, CA 94301

**MARCH 22, 2021 CITY COUNCIL MEETING, AGENDA ITEM #3  
855 EL CAMINO REAL (20PLN-00252)**

Dear City Council:

I urge you to remove this item from your agenda, because the

proposed project is not exempt from the California Environmental Quality Act (CEQA) and requires either a Mitigated Negative Declaration or Environmental Impact Report before the Council can hold a public hearing on this application.

The staff report alleges that the project is exempt from CEQA pursuant to CEQA Regulation Section 15301 (Existing Facilities).

CEQA Regulation 15301 says,

"15301. EXISTING FACILITIES Class 1 consists of the operation, repair, maintenance, permitting, leasing, licensing, or minor alteration of existing public or private structures, facilities, mechanical equipment, or topographical features, ***involving negligible or no expansion of existing or former use.***" (Emphasis Added)

I urge you to ask the City Attorney in open session whether I have accurately quoted the text of CEQA Regulation 15301.

The last two pages attached to the staff report for this agenda item show the floor area of each occupied use at Town and Country Village.

Only one leased space at Town and Country Village in location 82 (Dr. Berkowitz at For Eyes) is a medical office consisting of only 720 square feet.

The thousands of square feet of additional medical offices recommended is not a "negligible" expansion of an existing use as required by CEQA Regulation 15301.

Proceeding with your scheduled hearing on the basis of staff's proposed CEQA exemption is a violation of CEQA and a prejudicial abuse of discretion.

Planning Director Johnathan Lait's spouse's solo psychotherapy practice is currently prohibited from replacing retail uses on the ground floor at Town and Country Village Shopping Center, but would be permitted to replace retail uses if you adopt the proposed ordinance.

Does that fact mean that the proposed ordinance has a foreseeable material financial effect on Director Lait that is distinguishable from the public generally and that, therefore, he has a potential conflict of interest regarding the medical office language in the proposed ordinance?

Thank you for your consideration of these comments.

Sincerely,

Herb Borock

**From:** [Rebecca Eisenberg](#)  
**To:** [Aram James](#); [Elizabeth Collet Funk](#)  
**Cc:** [chuck jagoda](#); [WILPF Peninsula Palo Alto](#); [Roberta Ahlquist](#); [Human Relations Commission](#); [Planning Commission](#); [Council, City](#); [Greer Stone](#); [Tanaka, Greg](#); [ParkRec Commission](#); [DuBois, Tom](#); [Cormack, Alison](#); [Filseth, Eric \(Internal\)](#); [patti@safekids.com](mailto:patti@safekids.com); [Tanner, Rachael](#); [Shikada, Ed](#)  
**Subject:** Re: In less than a year, Mountain View builds and opens new 100-unit homeless housing complex  
**Date:** Friday, May 7, 2021 11:14:42 AM

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

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All:

Thank you to Aram for distributing this fantastic article about Mountain View's exceptional program.

These units were provided by LifeMoves -- the largest and most proven local provider of wrap-around services. The temporary and attractive shelter units were provided in cooperation with Dignity Moves, which was founded by my dear friend Elizabeth Funk, included on this email. The funding was provided via the HomeKey Program, which (as you have heard me say a few times ;) ) gave away \$840 million last year, and is about to give away \$1.5 billion this year -- but only to cities (cities more than counties!) that apply.

Wouldn't it be wonderful to have a similar program here in Palo Alto? LifeMoves has been trying very hard to do that -- but is receiving pushback and lack of interest from Palo Alto elected leaders and city staff. How about taking a meeting with Elizabeth (in the to:line) and the LifeMoves Team? If you can't imagine a good location for these units amongst Palo Alto's current portfolio of property holdings, the HomeKey program actually provides funding to acquire parcels for this purpose. Why not?

Please feel free to reach out to [Elizabeth](#) directly, or let me know and I would be happy to do the logistical work of setting something up for you. Also, Human Relations Commissioner Patti Rehgar (cc'd) toured the Mountain View site recently, and would be happy to share her observations and thoughts.

To learn more, here are some resources:

LifeMoves Mountain View: <https://www.lifemoves.org/homekey/>

LifeMoves Playbook on sheltering the unhoused: <https://resources.lifemoves.org/lifemoves-playbook>

Dignity Moves: <https://dignitymoves.org/>

My conversation with Elizabeth about LifeMoves's innovative solutions: <https://www.youtube.com/watch?v=xKw6KZsyfqQ>

Given the state funding and the readiness of LifeMoves to work with Palo Alto, what is there to lose?

Thanks in advance for working towards serving our community, together.

Warm regards,

Rebecca

On Fri, May 7, 2021 at 10:43 AM Aram James <[abjpd1@gmail.com](mailto:abjpd1@gmail.com)> wrote:

<https://www.mv-voice.com/news/2021/05/06/in-less-than-a-year-mountain-view-builds-and-opens-new-100-unit-homeless-housing-complex>

Shared via the [Google app](#)

Sent from my iPhone

**Rebecca L. Eisenberg Esq.**  
[www.linkedin.com/in/eisenberg](http://www.linkedin.com/in/eisenberg)  
[www.winwithrebecca.com](http://www.winwithrebecca.com)  
[rebecca@winwithrebecca.com](mailto:rebecca@winwithrebecca.com)  
415-235-8078

**From:** [Roberta Ahlquist](#)  
**To:** [Tom DuBois](#); [DuBois, Tom](#); [Lydia Kou](#); [Kou, Lydia](#); [Alison Cormack](#); [Cormack, Alison](#); [Greer Stone](#); [Stone, Greer](#); [Pat Burt](#); [Burt, Patrick](#); [Greg Tanaka](#); [Tanaka, Greg](#); [Filseth, Eric \(external\)](#); [Filseth, Eric \(Internal\)](#); [Council, City](#); [Shikada, Ed](#); [Human Relations Commission](#); [Planning Commission](#); [Joe Simitian](#); [Joe Simitian](#); [Josh Becker](#); [joshbbecke1@gmail.com](#); [Aram James](#); [Roberta Ahlquist](#); [WILPF Peninsula Palo Alto](#); [WILPF Peninsula Palo Alto](#); [mark weiss](#); [Mark Petersen-Perez](#); [Dave Price](#); [Bill Johnson](#); [Jesse Gary](#); [rebecca](#); [Angie, Palo Alto Renters Association](#)  
**Subject:** Re: Eric Filseth's one-line defense of the Mayor  
**Date:** Monday, May 3, 2021 5:27:03 PM

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

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It has become very clear that some of our elected council have little understanding of the role that social class plays. It is called intersectionality,

and you need to factor in race/class/ethnicity/gender/ability in your analysis. These ideas do not 'stand' alone in isolation. Please consider

educating yourselves regarding the role that all of these play in purchasing housing, among many other things.

Roberta Ahlquist,

Low-income Housing Committee, Women's International League for Peace & Freedom,  
Peninsula branch

<https://www.sfchronicle.com/local/article/Palo-Alto-s-housing-debate-is-a-battle-over-16142750.php?>

***“I think the majority of new homes being acquired in Santa Clara County are by Asian Americans,” DuBois said. “I don’t know how you say the zoning itself is exclusionary.”***

On Mon, May 3, 2021 at 12:45 PM Rebecca Eisenberg <[rebecca@winwithrebecca.com](mailto:rebecca@winwithrebecca.com)> wrote:

Responding publicly to Eric Filseth's defense of the Mayor, which was sent to me directly rather than to the group:

Eric writes:

On Sun, May 2, 2021 at 3:04 PM Eric Filseth <[efilseth@gmail.com](mailto:efilseth@gmail.com)> wrote:

| Data on this is publicly available if you know where to look. Eric

I respond:

Eric, I conduct research for a living. I have looked many places, including on paid databases that attorneys and legal researchers rely on for filing and defending cases related to civil rights and racial discrimination.

**From:** [Rebecca Eisenberg](#)  
**To:** [Tom DuBois](#); [DuBois, Tom](#); [Lydia Kou](#); [Kou, Lydia](#); [Alison Cormack](#); [Cormack, Alison](#); [Greer Stone](#); [Stone, Greer](#); [Pat Burt](#); [Burt, Patrick](#); [Greg Tanaka](#); [Tanaka, Greg](#); [Filseth, Eric \(external\)](#); [Filseth, Eric \(Internal\)](#); [Council, City](#); [Shikada, Ed](#); [Human Relations Commission](#); [Planning Commission](#)  
**Subject:** Who really owns most of our real estate?  
**Date:** Monday, May 3, 2021 12:59:08 PM

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

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Finally, it's easy to find a list of the actual largest owners of Silicon Valley. My favorite resource is the well-researched Mercury News article that can be found here:

<https://extras.mercurynews.com/whoowns/>

In sum, these giant corporations (and the white billionaires that control them) own most of our region, and many of these huge companies have been increasing their footprints in Palo Alto:

- 1 Stanford University
- 2 Apple
- 3 Google
- 4 Irvine Company
- 5 Jay Paul
- 6 Cisco Systems
- 7 Essex Property
- 8 Intel
- 9 Sobrato Organization
- 10 Prometheus

Not an Asian-American individual in the bunch.

Best,

Rebecca

On Mon, May 3, 2021 at 12:44 PM Rebecca Eisenberg <[rebecca@winwithrebecca.com](mailto:rebecca@winwithrebecca.com)> wrote:

Responding publicly to Eric Filseth's defense of the Mayor, which was sent to me directly rather than to the group:

Eric writes:

On Sun, May 2, 2021 at 3:04 PM Eric Filseth <[efilseth@gmail.com](mailto:efilseth@gmail.com)> wrote:

| Data on this is publicly available if you know where to look. Eric

I respond:

Eric, I conduct research for a living. I have looked many places, including on paid databases that attorneys and legal researchers rely on for filing and defending cases related to civil rights and racial discrimination.

Given the highly charged state of race relations and the urgent crisis of discrimination and violence against AAPI individuals, not to mention PACC's official commitment to end such bias and discrimination, one would think that the Mayor of a famous city would not make such a generalization without solid proof that his comments are true (query why a white mayor of a majority white city would make this statement altogether). If there is a source I am not aware of, at very least you should clarify which source, don't you think? "If you know where to look" is not a source.

On the other side of "where to look" are ample sources demonstrating the Mayor's comments to be based on racial bias rather than on facts. Perhaps the Mayor is confusing "rate of purchase" with "percentage of buyers?"

In other words, there is no evidence available that Asian-Americans make up MOST of home buyers in Santa Clara County, and there is a lot of evidence that they do not, including the Pew article and the LA Times article I cited and linked.

The closest I could find is that the RATE of Asian American purchases was increasing. And that they purchase at a higher **percentage** than non-Asians.

BUT Asian-Americans still are only approximately 1/3 of the population. They can purchase in higher percentages but that does not make them the majority of buyers. Even if every single AA bought a home -- which is not true -- it is still unlikely that they could comprise the majority of buyers. It's close to mathematically impossible.

Perhaps the Mayor is confusing rate of purchase with percentage of buyers?

Asian-Americans may purchase at a rate of 60% of their ethnic group overall (this is a made-up number to show you how the math works), but that 60% of AAs still cannot constitute a majority of buyers given that AAs are only 38% of the population. 60% of 38% equals 22.8%.

Or, perhaps the Mayor was conflating \*Asian American\* buyers with \*Asian\* buyers -- aka, buyers from outside the country? Although it is true that many purchasers of SCC land are Asian nationals, there is no evidence that Asian nationals, alternatively, purchase most of the available homes. (And BTW Asian-Americans generally do not appreciate being confused and/or conflated with Asian nationals.)

TL/DR Asian-Americans may be the largest ethnic group of buyers, and possibly (although unproven) they constitute a plurality of buyers, but it is highly unlikely that they make up the majority of buyers, and if they did, I am not sure if that data is available beyond, possibly, a list of "Asian sounding names."

This may seem like mincing words to you, but in a context of a known epidemic of violence against Asian-Americans, these types of unfounded remarks often fuel the fire of racial

violence. Given that this remark was out of place in the first place, I wonder why a Mayor would resort to race-based fear-mongering as a way (ironically) to argue that racism does not exist?

I ask you again to be more careful with your words. These types of generalizations fuel the very anti-AAPI violence and discrimination that you swore officially to fight against.

Best,  
Rebecca

**Rebecca L. Eisenberg Esq.**  
[www.linkedin.com/in/eisenberg](http://www.linkedin.com/in/eisenberg)  
[www.winwithrebecca.com](http://www.winwithrebecca.com)  
[rebecca@winwithrebecca.com](mailto:rebecca@winwithrebecca.com)  
415-235-8078

On Sun, May 2, 2021 at 3:04 PM Eric Filseth <[efilseth@gmail.com](mailto:efilseth@gmail.com)> wrote:

Data on this is publicly available if you know where to look. Eric

---

**From:** Rebecca Eisenberg <[rebecca@winwithrebecca.com](mailto:rebecca@winwithrebecca.com)>  
**Sent:** Sunday, May 02, 2021 3:41 AM  
**To:** Tom DuBois <[tomforcouncil@gmail.com](mailto:tomforcouncil@gmail.com)>; [tom.dubois@cityofpaloalto.org](mailto:tom.dubois@cityofpaloalto.org); Lydia Kou <[lydiakou@gmail.com](mailto:lydiakou@gmail.com)>; Kou, Lydia <[lydia.kou@cityofpaloalto.org](mailto:lydia.kou@cityofpaloalto.org)>; Alison Cormack <[alisonlcormack@gmail.com](mailto:alisonlcormack@gmail.com)>; Alison Cormack <[alison.cormack@cityofpaloalto.org](mailto:alison.cormack@cityofpaloalto.org)>; Greer Stone <[gstone22@gmail.com](mailto:gstone22@gmail.com)>; [greer.stone@cityofpaloalto.org](mailto:greer.stone@cityofpaloalto.org); Pat Burt <[patburt11@gmail.com](mailto:patburt11@gmail.com)>; [pat.burt@cityofpaloalto.org](mailto:pat.burt@cityofpaloalto.org); Greg Tanaka <[greg@gregtanaka.org](mailto:greg@gregtanaka.org)>; [greg.tanaka@cityofpaloalto.org](mailto:greg.tanaka@cityofpaloalto.org); Eric Filseth <[efilseth@gmail.com](mailto:efilseth@gmail.com)>; Filseth, Eric (Internal) <[Eric.Filseth@cityofpaloalto.org](mailto:Eric.Filseth@cityofpaloalto.org)>; Council, City <[city.council@cityofpaloalto.org](mailto:city.council@cityofpaloalto.org)>; Shikada, Ed <[Ed.Shikada@cityofpaloalto.org](mailto:Ed.Shikada@cityofpaloalto.org)>; Human Relations Commission <[hrc@cityofpaloalto.org](mailto:hrc@cityofpaloalto.org)>; Planning Commission <[Planning.Commission@cityofpaloalto.org](mailto:Planning.Commission@cityofpaloalto.org)>  
**Cc:** [susan@susanellenberg.com](mailto:susan@susanellenberg.com); Joe Simitian <[supervisor.simitian@bos.sccgov.org](mailto:supervisor.simitian@bos.sccgov.org)>; Joe Simitian <[joe.simitian@bos.sccgov.org](mailto:joe.simitian@bos.sccgov.org)>; Josh Becker <[becker.josh@gmail.com](mailto:becker.josh@gmail.com)>; [joshbbecker1@gmail.com](mailto:joshbbecker1@gmail.com); Aram James <[abjpd1@gmail.com](mailto:abjpd1@gmail.com)>; Roberta Ahlquist <[roberta.ahlquist@sjsu.edu](mailto:roberta.ahlquist@sjsu.edu)>; WILPF Peninsula Palo Alto <[wilpf.peninsula.paloalto@gmail.com](mailto:wilpf.peninsula.paloalto@gmail.com)>; WILPF Peninsula Palo Alto <[wilpfpeninsulapaloalto@gmail.com](mailto:wilpfpeninsulapaloalto@gmail.com)>; mark weiss <[earwopa@yahoo.com](mailto:earwopa@yahoo.com)>; Mark Petersen-Perez <[paloaltofreepress@gmail.com](mailto:paloaltofreepress@gmail.com)>; Dave Price <[price@padailypost.com](mailto:price@padailypost.com)>; Bill Johnson <[bjohnson@paweekly.com](mailto:bjohnson@paweekly.com)>; Jesse Gary <[jesse.gary@foxtv.com](mailto:jesse.gary@foxtv.com)>  
**Subject:** ""I think the majority of new homes being acquired in Santa Clara County are by Asian Americans," DuBois said. "I don't know how you say the zoning itself is exclusionary.""



Dear Mayor Dubois,

I was confused and concerned by a (purported) factual assertion you made to the San Francisco Chronicle, because I fear it may reflect unconscious bias more than it reflects factual reality.

Specifically, you said:

[https://www.sfchronicle.com/local/article/Palo-Alto-s-housing-debate-is-a-battle-over-16142750.php?](https://www.sfchronicle.com/local/article/Palo-Alto-s-housing-debate-is-a-battle-over-16142750.php)

*“I think the majority of new homes being acquired in Santa Clara County are by Asian Americans,” DuBois said. “I don’t know how you say the zoning itself is exclusionary.”*

I wonder on what basis you concluded that most new homes are purchased by Asian Americans? I am not aware of any study that confirms your observation. Rather, available economic studies conclude that Asian Americans as a group have a lower rate of home ownership than non-minority groups. Pew Research provides a helpful overview of these matters:

<https://www.pewresearch.org/fact-tank/2021/04/29/key-facts-about-asian-americans/>

One of the most important points made by this Pew article (and all others on this topic) is the important point that "Asian Americans" are not a unitary group. There are dozens of countries in Asia from which Santa Clara county residents have emigrated. Like with all ethnic groups, immigrant communities range the socio-economic scale. Although there are some Asian-Americans who have succeeded in accumulating significant wealth, the truth is that there also are Asian-Americans who are poor and struggling, as with other minority (and otherwise historically excluded) groups. Decision Theory may attribute your remarks to a flawed yet very common bias in perception called the "representative heuristic." Under the theory of the representative heuristic, first introduced by Amos Tversky and Daniel Kahnemann as part of their creation of Decision Theory (for which Dr. Kahnemann was awarded a Nobel Prize, which he would have shared with Dr. Tversky had Dr. Tversky still been alive at the time), the representative heuristic creates a misperception in the eyes of the beholder that "those they see" represent "those that are." In other words, when policy makers surround themselves only with the wealthy, they often have trouble even \*believing\* in the poor.

Here is an interesting article about Asian American homeownership, which also discusses the genuine harm and risk to safety that is created by the perpetuated of harmful stereotypes against minority groups such as Asian-Americans:

<https://www.latimes.com/world-nation/story/2021-04-29/asian-americans-north-dakota>

There are innumerable reasons that you could have made that problematic remark about Asian-Americans buying the majority of available homes in Santa Clara County. But, given the lack of factual support for your comment, I wonder if any of those reasons reflects well on your capacity to represent Palo Alto, where Asian Americans (of every socio-economic level) represent a large, diverse, and vibrant percentage of our residents.

Being Mayor of a world-famous city like Palo Alto means that people listen to what you say, and believe that you speak the truth. This certainly was the case for the San Francisco Chronicle reporter, who did not fact-check any of your assertions, even when demonstrably false (such as the questionable assertions that Cupertino is behind Palo Alto on housing, and the disproven theories that multi-family housing (a) increases traffic and/or (b) reduces home values). Given the weight given to your remarks, It strikes me that a truly civil and responsible leader would work harder to choose his words more carefully.

I hope you will receive this email in the civil and constructive spirit in which it was sent. Feel free to call me at any time to discuss. 415-235-8078.

Warm regards,

Rebecca

On Sun, May 2, 2021 at 3:41 AM Rebecca Eisenberg <[rebecca@winwithrebecca.com](mailto:rebecca@winwithrebecca.com)> wrote:

Dear Mayor Dubois,

I was confused and concerned by a (purported) factual assertion you made to the San Francisco Chronicle, because I fear it may reflect unconscious bias more than it reflects factual reality.

Specifically, you said:

<https://www.sfchronicle.com/local/article/Palo-Alto-s-housing-debate-is-a-battle-over-16142750.php?>

***“I think the majority of new homes being acquired in Santa Clara County are by Asian Americans,” DuBois said. “I don’t know how you say the zoning itself is exclusionary.”***

I wonder on what basis you concluded that most new homes are purchased by Asian Americans? I am not aware of any study that confirms your observation. Rather, available economic studies conclude that Asian Americans as a group have a lower rate of home ownership than non-minority groups. Pew Research provides a helpful overview of these matters:

<https://www.pewresearch.org/fact-tank/2021/04/29/key-facts-about-asian-americans/>

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<https://www.latimes.com/world-nation/story/2021-04-29/asian-americans-north-dakota>

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and/or (b) reduces home values). Given the weight given to your remarks, It strikes me that a truly civil and responsible leader would work harder to choose his words more carefully.

I hope you will receive this email in the civil and constructive spirit in which it was sent. Feel free to call me at any time to discuss. 415-235-8078.

Warm regards,

Rebecca

**Rebecca L. Eisenberg Esq.**  
[www.linkedin.com/in/eisenberg](http://www.linkedin.com/in/eisenberg)  
[www.winwithrebecca.com](http://www.winwithrebecca.com)  
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415-235-8078

**From:** Robert Neff  
**To:** [transportation@cityofpaloalto.gov](mailto:transportation@cityofpaloalto.gov); PABAC; Planning Commission  
**Cc:** [Star-Lack, Sylvia](mailto:Star-Lack_Sylvia)  
**Subject:** Act to connect MV / LA El Camino bike lanes to Palo Alto, at low cost.  
**Date:** Sunday, May 2, 2021 2:00:32 PM

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

Hello Transportation Staff, Planning and Transportation Committee, and Palo Alto PABAC,

We should act quickly to develop restriping plans for El Camino Real to connect bike lanes in Mountain View and Los Altos to the bike network in Palo Alto. This should be very low cost for Palo Alto, but staff engagement with Mountain View and Los Altos should be pursued with urgency.

Background:

From Rengsdorf to Adobe Creek, El Camino Real is bordered by Los Altos on the West side, and Mountain View and then Palo Alto on the East side. Mountain View is planning major changes to El Camino, installing bike lanes with hardscape on the section of El Camino that is entirely in Mountain View, South of Rengsdorf, but bike lanes closer to Palo Alto will require collaboration with neighbors. Los Altos is considering a new restriping of El Camino Real across the street from Mountain View. Restriping can be covered by CalTrans as part of the project, and plans need to be completed by January, 2022, for restriping in summer of 2022, after repaving.

How does this affect Palo Alto? We should be prepared to act to extend El Camino bike lanes to bike network connections in Palo Alto. At minimum, this would be a 200 foot section in front of the Country Inn Motel on El Camino to connect to the Cesano Court/Los Altos Ave. traffic signal. From Cesano Court bicyclists can connect via pathway to Monroe Drive and then Miller Ave and Wilkie Way. Los Altos Ave connects to Palo Alto's network via the off street path leading to Fletcher and Gunn schools. Better would be extending bike lanes north to Arastradero/Charleston and further.

We are fortunate that Los Altos already has done a parking study, including parking on the East side of El Camino in Palo Alto, from Adobe Creek south. That is here:

[https://www.losaltosca.gov/sites/default/files/fileattachments/complete\\_streets\\_commission/meeting/53411/item\\_4\\_-\\_attachment\\_a\\_-\\_los\\_altos\\_-\\_ecr\\_parking\\_removal\\_study\\_for\\_bike\\_lane\\_installation.pdf](https://www.losaltosca.gov/sites/default/files/fileattachments/complete_streets_commission/meeting/53411/item_4_-_attachment_a_-_los_altos_-_ecr_parking_removal_study_for_bike_lane_installation.pdf)

Here is a report to the Los Altos Complete Streets Commission regarding this work.

[https://www.losaltosca.gov/sites/default/files/fileattachments/complete\\_streets\\_commission/meeting/53411/item\\_4\\_-\\_staff\\_report\\_-\\_el\\_camino\\_real\\_bike\\_lanes\\_-\\_042821.pdf](https://www.losaltosca.gov/sites/default/files/fileattachments/complete_streets_commission/meeting/53411/item_4_-_staff_report_-_el_camino_real_bike_lanes_-_042821.pdf)

I received the note below from the Los Altos Complete Streets Commission vice chair. We both serve on the VTA BPAC.

---

-- Robert Neff  
Palo Alto representative to VTA/county Bike/Ped Advisory Committee (and 2021 chair), and PABAC member.  
[robert@neffs.net](mailto:robert@neffs.net)

----- Original Message -----

**Subject:**El Camino CalTrans bike lane proposal for PA, LA, MtView  
**Date:**2021-04-28 09:42  
**From:**Stacy Bruzek Banerjee <[stacybbanerjee@gmail.com](mailto:stacybbanerjee@gmail.com)>  
**To:**Robert Neff <[robert@neffs.net](mailto:robert@neffs.net)>

Robert,

It's a bit short notice, but I am just going through the packet for my Los Altos commission meeting tonight. One item on agenda is El Camino Real. Caltrans is resurfacing ECR next year between the Menlo Park/Palo Alto border all the way to 237. They have grant funds to put in bike lanes, if cities along the stretch provide approval and their policies (including addressing parking - parking removal).

Have you been looking at this in Palo Alto yet? And where do things stand/what is the thinking? Looks like Mountain View has already approved parking removal.

Here's our staff report:

[https://www.losaltosca.gov/sites/default/files/fileattachments/complete\\_streets\\_commission/meeting/53411/item\\_4\\_-\\_staff\\_report\\_-\\_el\\_camino\\_real\\_bike\\_lanes\\_-\\_042821.pdf](https://www.losaltosca.gov/sites/default/files/fileattachments/complete_streets_commission/meeting/53411/item_4_-_staff_report_-_el_camino_real_bike_lanes_-_042821.pdf)

Stacy  
M 415-317-3990

**From:** [Roberta Ahlquist](#)  
**To:** [Aram James](#)  
**Cc:** [Rebecca Eisenberg](#); [Council, City](#); [Planning Commission](#); [chuck jagoda](#); [WILPF Peninsula Palo Alto](#); [Human Relations Commission](#); [mark weiss](#)  
**Subject:** Re: The Mercury News E-Edition Article  
**Date:** Saturday, May 1, 2021 9:15:40 PM

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

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YES. I spent Thursday and Friday in Oakland taking a look at these diverse and creative alternatives. When will we have to courage to grow our city in a more collaborative, community-oriented and inclusive direction?  
roberta

On Sat, May 1, 2021 at 1:02 PM Aram James <[abjpd1@gmail.com](mailto:abjpd1@gmail.com)> wrote:

Hi Rebecca,  
Thanks for all of your spot on comments. Aram

Sent from my iPhone

On May 1, 2021, at 12:23 PM, Rebecca Eisenberg <[rebecca@winwithrebecca.com](mailto:rebecca@winwithrebecca.com)> wrote:

This is exactly how housing should evolve. Query why any human being should have to pay for a place to live. Query why all land is not owned by the public for the use of the public. Human beings are meant to live in social communities, to share resources, to work together. In a different universe, our society moved in the direction of social villages rather than in the direction of the toxic and private isolation that is fostered and protected, despite its harm, today.

Note that Cob on Wood is located under a 880 highway overpass. This is what we could see if Caltrain/HSR were moved to viaducts. No cost to the city. There likely are lots of locations that could host such attractive and sanitary shelter. Perhaps some that are under the radar to escape political scrutiny and public notice.

When our government leaves such huge gaps, human invention picks up. If a similar community grew here, would our local government quash it, when that community actually would be providing the resources that our city is legally and ethically required to provide? I fear that Palo Alto would destroy these beautiful communities. Palo Alto -- virtually alone in the world -- continues to cling to the myth that homeless shelters attract and increase homelessness, despite decades of evidence, studies, and lived experiences proving the opposite: that shelters and housing are the only known solution way to end homelessness.

Best,

Rebecca

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On Sat, May 1, 2021 at 9:29 AM Aram James <[abjpd1@gmail.com](mailto:abjpd1@gmail.com)> wrote:

Follow the link below to view the article.

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