

July 6, 2012

Ken Kirkey  
Director of Planning and Research  
Association of Bay Area Governments  
P.O. Box 2050  
Oakland, CA 94604-2050

*Delivered via e-mail to [kennethk@abag.ca.gov](mailto:kennethk@abag.ca.gov) and [RHNA\\_Feedback@abag.ca.gov](mailto:RHNA_Feedback@abag.ca.gov)*

**Re: Adoption of draft Regional Housing Need Allocation (RHNA) methodology**

Dear Mr. Kirkey:

On July 3, 2012, the Walnut Creek City Council reviewed the recently released draft Regional Housing Need Allocation (RHNA) Methodology for the upcoming 2014 – 2022 cycle. The following comments are based upon direction given by the Council:

Due to the timelines contained in State Law, the RHNA methodology is being prepared prior to the adoption of the Sustainable Communities Strategy (SCS), despite the fact that State Law also requires the RHNA methodology to be consistent with the SCS. The final SCS will not be adopted until April 2013, by which time the final RHNA allocations will have already been issued. Given this situation, the RHNA methodology should include a mechanism that allows for the reduction of an individual jurisdiction's RHNA allocation, should that jurisdiction's growth projections contained within the final SCS be significantly lower than those contained in the recently approved Preferred Land Use and Transportation Investment Strategy (the preferred scenario for the SCS).

Thank you for the opportunity to comment. If you have any questions regarding this letter, please feel free to contact me at (925) 943-5899 x2213 or [asmith@walnut-creek.org](mailto:asmith@walnut-creek.org).

Sincerely,

Andrew M. Smith  
Senior Planner

Cc: Walnut Creek City Council  
Ken Nordhoff, City Manager  
Sandra Meyer, Community Development Director  
Steve Buckley, Planning Manager  
Laura Simpson, Housing Program Manager



THE CITY OF  
**NOVATO**  
CALIFORNIA

75 Rowland Way #200  
Novato, CA 94945-3232  
415/899-8900  
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www.novato.org

Mayor  
Denise Athas  
Mayor Pro Tem  
Pat Eklund  
Councilmembers  
Madeline Kellner  
Eric Lucan  
Jeanne MacLeamy

City Manager  
Michael S. Frank

June 29, 2012

Mr. Mark Luce, President  
Association of Bay Area Governments  
P. O. Box 2050  
Oakland, CA 94607-4756

Re: City of Novato Comments on Draft Methodology  
Regional Housing Need Assessment 2014-2022

Dear Mr. Luce:

The Novato City Council appreciates ABAG's efforts on the draft Regional Housing Need Assessment (RHNA) Methodology 2014-2022, a major undertaking. We thank ABAG staff for their willingness to communicate directly with our staff, and we expect to be able to continue discussing the points below with ABAG RHNA staff.

At its June 26, 2012 meeting, the Novato City Council reviewed and considered materials and testimony concerning the Draft Regional Housing Need Allocation (RHNA) Methodology for 2014-2022 and has the following comments:

1. The Past RHNA Performance factor should be applied AFTER the Minimum Housing Floor factor, so that communities are, in fact, credited for achieving their RHNA allocations. When this factor is applied BEFORE the Minimum Housing Floor factor, the credit for achieving the RHNA allocation disappears. In fact, it results in an increased allocation due to the 40% floor factor. The staff report to the ABAG Executive Board dated May 17, 2012 discusses the Past RHNA Performance factor after the Minimum Housing Floor factor, which is misleading to the general reader as the methodology computation is in reverse order. This manner of computation is a serious defect of the RHNA 2014-2022 draft methodology since it does not encourage jurisdictions to achieve their RHNA allocations. Jurisdictions need and deserve such positive incentives as part of the RHNA methodology as recommended by the ABAG Housing Methodology Committee.
2. The Minimum Housing Floor factor should be re-examined. We understand that there was a strong desire to ensure that every jurisdiction be required to do 'its fair share'. However, there is no explanation or rationale provided on why 40% was selected. We understand that ABAG staff presented the Housing Methodology Committee with three choices - 40%, 50% and 60%. Why were those percentages presented and not others such as 30% or 25%? A reduction of the floor for those few cities in the 9 County Bay Area that

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**JUL 02 2012**

EXECUTIVE DIRECTOR'S OFFICE

did achieve their Past RHNA allocations should be included. That would give jurisdictions a second incentive to achieve the RHNA allocations which could result in higher RHNA performance in the future.

3. The Employment factor appears to be based on 2010 job estimates rather than actual census data for individual jurisdictions. We remain concerned that the jobs projections of the draft Jobs-Housing Connection Strategy are too high for the region and especially for Marin and the City of Novato. It is unclear whether use of these data accounts for the full continuing effects of the recession on local jobs. A recent article in our local paper stated that "From 2007-10 the county lost 10,317 jobs, or about one in every 10 jobs, according to figures released Tuesday by the U.S. Census Bureau." The article continued to highlight that "It is not clear how Marin industries have fared since 2010 because there is an 18-month lag in the release of detailed census data each year. The latest figures also do not include data for self-employed workers, which will be released separately..." The Employment factor needs to be based on actual census data rather than estimates.

4. The 2014-2022 RHNA Housing Methodology needs to recognize the continuing economic recession for the first cycle for the Sustainable Communities Strategy (SCS). It appears that the RHNA allocations for the 8-year cycle 2016-2022 are higher than its proportional share of the 30 year SCS 2010-2040. Given the struggling economic conditions, it may take several more years for the housing industry to recover, and the 2014-2022 RHNA Housing Methodology should recognize our current employment situation.

Lastly, we want to emphasize that the draft RHNA 2014-2022 Methodology does not account for the amount of affordable housing that was provided in Novato during the 1999-2006 RHNA cycle. Novato provided a significant proportion, beyond the City's share of population in Marin County, of all affordable housing in Marin County during that time period. With the way the Past RHNA Performance factor is applied in the draft RHNA 2014-2022 Methodology, there is no real acknowledgment of that affordable housing achievement in Novato. It appears that about half the jurisdictions that achieved their RHNA allocations during that cycle are not getting full credit for their success.

Again, thank you for the opportunity to comment and for ABAG's work on the State-mandated RHNA process. We look forward to your consideration of our comments and modifications to the draft RHNA 2014-2022 Methodology that reward communities that actually get

Mr. Mark Luce  
page 2

June 29, 2012

affordable housing built. Please contact Anne Moore, Interim General  
Plan Manager, if you have questions.

Sincerely,



Denise Athas, Mayor

cc: City Council  
Planning Commission  
City Manager  
City Attorney  
City Interim General Plan Manager  
Association of Bay Area Governments, Attn: Ezra Rapport  
Metropolitan Transportation Commission, Attn: Steve  
Heminger  
League of California Cities, Attn: Dan Carrig  
Transportation Authority of Marin, Attn: Dianne Steinhauser





June 29, 2012

Ken Kirkey, Director of Planning and Research  
Association of Bay Area Governments  
PO Box 2050  
Oakland, CA 94604-2050

RE: Regional Housing Needs Allocation (RHNA 2014-2022)

Dear Mr. Kirkey:

This letter is in response to the recent ABAG memo regarding the 2014 RHNA methodology and ABAG staff's recommendation on draft allocations. Sunnyvale has reviewed the methodology, and although questions remain, it appears that the RHNA methodology will have a marginal effect on Sunnyvale's final allocation. Instead, we are more concerned with the starting point of 5,685 dwelling units that is used in applying the Draft RHNA methodology. We understand this starting number is set through the Sustainable Communities Strategy (SCS) process. Sunnyvale's primary concerns are the aggressive 8-year growth expectation and the trickledown effect on meeting State affordable housing requirements.

Sunnyvale is concerned at this time about the ultimate allocation results. We understand that the allocation numbers currently presented are considered draft and acknowledge that the allocation is driven by the SCS process. We also point out that the numbers represent an assumption of the division of units citywide and within PDAs; however two of the significant PDAs assumed in Sunnyvale (Lawrence Station, East Sunnyvale) have not been adopted yet. The allocation is also representative of buildout numbers in our current General Plan and Draft Land Use and Transportation Element (again not adopted); however, both documents are long-range plans (2025 and 2035 horizon years, respectively) as opposed to the 8-year horizon of the RHNA.

As you are aware, Sunnyvale has been consistently recognized as a leader in meeting its housing needs. Although Sunnyvale is currently experiencing an unusually high development market for certain types of housing, based on a historic average, we can realistically expect development of 300 net new dwelling units per year. We are concerned that the overall number assigned to Sunnyvale (5,374) is unrealistically high. It requires an average growth rate of 696 dwelling units a year over an 8-year period. While our General Plan

indicates the potential to accommodate these units in the long-term, market forces will play a major role in dictating how quickly those units get built.

In regards to affordable housing, while we generally understand the rationale behind the methodology used to arrive at the total RHNA for Sunnyvale, and for dividing the overall housing demand into the four affordability levels, we are concerned about our ability to meet the need for lower income units the City has been allocated. A nexus study recently commissioned by the City estimated that a subsidy of approximately \$250,000 (in 2011 dollars), is currently required to develop one housing unit for a very low income household, and approximately \$116,000 is required for one low income household unit, as shown below.

<b>Affordable Units</b>	<b>Sunnyvale RHNA</b>	<b>Subsidy Per Unit</b>	<b>Total Subsidy Required</b>
<b>Very Low Income</b>	1,540	\$250,000	\$385,000,000
<b>Low Income</b>	871	\$116,000	\$101,036,000
<b>Total</b>	2,411	n/a	\$486,036,000

**Assumptions:** Affordable units are 2-bedroom apartments in 3-4 story multi-family building with podium parking, at density of 50 units/acre

*Nexus study by EPS, Inc. 12/22/2011*

These estimates were derived using very conservative assumptions regarding development cost, and are not adjusted to reflect general inflation that will occur over the 8-year RHNA period, nor typical annual increases in land and construction costs, which, especially in the Silicon Valley, typically increase at far greater annual rates than the general inflation indices used for statewide or national economic projections. Even using these very conservative assumptions and before factoring in inflation, the total cost for the City to meet the RHNA for very low and low income units for the next cycle (2014-2022) would be nearly half a billion dollars in 2011. In addition to the investment of nearly half a billion dollars, this allocation would require at least thirty net developable acres of available land zoned at densities of at least 50 units per acre.

We believe it is highly unrealistic for the state to expect any local jurisdiction to be able to meet these needs for lower income housing given the amount of subsidy required and the recent statewide actions to dissolve redevelopment agencies, and federal and state actions to cut back on affordable housing funding programs. At best, the City may receive approximately one to two

million dollars per year for affordable housing development from federal grants and local housing linkage fees and inclusionary housing in-lieu fees. Over an eight-year period such as the RHNA cycle, that equates to only \$8-16 million, less than 3% of the total amount of subsidy that would be required to meet the RHNA for the lower income housing needs for the next cycle. The City does not object to the allocation methodology per se, nor to the requirement to zone sufficient land in order to provide adequate sites for units at densities at or above 20 units per acre. The City will object to any adverse impacts of a negative review by the State HCD at the end of the next RHNA cycle (in 2022) if it, as expected, is unable to meet the entire RHNA need for affordable units, due to the extraordinary amount of public subsidy and private investment that would be required. Such financial resources are unavailable to any local jurisdiction in this day and age of budget reductions, reduced federal and state funding, and state actions to dissolve and de-fund redevelopment agencies.

Again, Sunnyvale would like to thank ABAG for an opportunity to review the RHNA allocation methodology prior to release of the final allocation. It is our understanding that once the RHNA methodology is adopted in July, cities will have a further opportunity to comment on their respective draft allocations before they are finalized later this year. We look forward to the opportunity to provide more specific comments on Sunnyvale's allocation once the RHNA methodology has been adopted.

Sincerely,

A handwritten signature in black ink, appearing to read "Hanson Hom", written over a light gray horizontal line.

Hanson Hom  
Director of Community Development

cc: City of Sunnyvale Mayor and City Councilmembers  
Gary Luebbbers, City Manager  
Trudi Ryan, Planning Officer  
Suzanne Isé, Housing Officer



June 29, 2012

Mr. Ken Kirkey, Planning Director  
Association of Bay Area Governments  
101 Eighth Street  
Oakland, CA 94607

**RE: Draft 2014-2022 RHNA Methodology**

Dear Mr. Kirkey,

Thank you for providing the opportunity for the Town of Los Altos Hills to comment on the 2014-2022 draft RHNA Methodology. Los Altos Hills is a hillside residential community with naturally scenic and open space areas where topography provides significant constraints to development such as steep slopes, unstable soils, seismic faults, creeks and waterways. Los Altos Hills has no commercial, retail, or industrial zoned lands, and no Priority Development Area (PDA) or Growth Opportunity Area (GOA). There is no public transit available within the Town except for two VTA bus lines serving Foothill College.

In the past three housing element cycles, the Town has continued to meet the State Housing Element law requirements by producing affordable housing units and rezoning land to provide for a variety of housing types. As a community with no proposed PDAs, the Town is already at a tremendous disadvantage as it would not be eligible to compete for over 70% of the funds that are designated for PDAs and PDA serving projects.

Under the current proposal, the Town of Los Altos Hills would be required to produce 1.5 times more units while larger cities with PDAs have receive a reduced allocation of up to 35%. The proposed methodology requiring a minimum 40% household formation is contrary to the region's sustainability goal to plan for housing near jobs and transit and penalizes smaller cities that have a lower number of housing units in the 1999-2006 and 2007-2014 cycles.

The Town of Los Altos Hills respectfully requests that the ABAG Executive Board considers these comments during the review and approval of the final RHNA methodology on July 19, 2012.

Sincerely,

A handwritten signature in blue ink that reads "Carl Cahill".

Carl Cahill, Town Manager  
Town of Los Altos Hills

cc: Ezra Rappaport, Executive Director, ABAG



# TOWN OF FAIRFAX

142 BOLINAS ROAD, FAIRFAX, CALIFORNIA 94930  
(415) 453-1584 / FAX (415) 453-1618

June 29, 2012

Mr. Mark Luce, President  
Association of Bay Area Governments  
P.O. Box 2050  
Oakland, CA 94607-4756

RE: Town of Fairfax Comments on Draft Methodology  
Regional Housing Need Assessment 2014-2044

Dear Mr. Luce:

Thank you for the opportunity to comment on the draft Regional Housing Need Assessment (RHNA) Methodology 2014-2022 as recommended in the letter we received dated May 29, 2012 from Mr. Ken Kirkey, ABAG Director of Planning and Research. At a special meeting this morning, the Fairfax Town Council voted to authorize me to write this letter for consideration at your Executive Board meeting on July 19, 2012.

First, we understand how arduous a process this is for all concerned to come up with equitable allocations for various regions, let alone for subregions like ours here in the physically constrained upper end of the Ross Valley – which is solely dependent upon the Sir Francis Drake Boulevard corridor (a corridor that is operating at extremely low levels of service already). Likewise, we understand and appreciate the need to accommodate housing needs throughout the region – particularly for all income groups within our communities.

However, having reviewed the RHNA allocations, we have some concern on the numbers and methodology of calculation and request that when reviewing the draft RHNA please keep in mind just how our particular Town is nearly built-out with almost all remaining undeveloped land, either very steeply sloped or constrained from development for other reasons. For example, the Town of Fairfax lies at the outer western edge of the “built environment” of Marin in a predominately Wild-lands Urban Interface (WUI) area – at the gateway to west Marin’s protected open space.

Thank you again for your consideration of our unique housing constraints. We invite you to visit our Town’s webpage to view our newly adopted 2010-30 General Plan within which the new Housing Element has strived to address these physical limitations by utilizing the few remaining developable parcels for senior housing, workforce housing, new second units and mixed use infill (TPP) development in the heart of Town near our transit hub.

Sincerely,

James M. Moore, Planning Director  
Town of Fairfax

cc: Mayor and Town Council members  
Interim Town Manager



# CITY OF SAUSALITO

420 Litho Street • Sausalito, CA 94965  
Telephone: (415) 289-4100  
www.ci.sausalito.ca.us

June 28, 2012

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

## **RE: Draft 2014-2022 Regional Housing Needs Allocation Methodology**

Dear Mr. Rapport:

The Sausalito City Council and staff have reviewed the draft Regional Housing Needs Allocation (RHNA) resulting from the draft 2014-2022 RHNA methodology approved by the Association of Bay Area Governments (ABAG) Board of Directors on May 17, 2012. In general we are pleased to see the RHNA numbers for Marin County, and in particular for Sausalito, have been reduced from draft RHNA numbers resulting from earlier versions of the 2014-2022 RHNA methodology.

However, the Council and members of the community continue to have serious concerns about the draft RHNA methodology that we want to share with you. Sausalito is a built-out community with significant physical and environmental constraints to development. The continued reliance on a methodology that places substantial weight to the provision of housing regardless of realistic development capacity is unsustainable.

Specifically, the use of a minimum housing floor of 40% of household formation growth results in a housing allocation that is clearly inconsistent with the overall objective of Senate Bill 375 to better integrate land-use and transportation planning. Any significant housing growth in smaller communities that are not support by employment centers or public transit would increase regional vehicle miles traveled and greenhouse gas emissions.

The draft proposed methodology also penalizes smaller cities that have a lower number of affordable units permitted in the 1999-2006 cycle. Cities should be evaluated on the number of affordable units permitted as a percentage of the total units permitted in their jurisdiction. Affordable housing is being built in smaller built-out cities and those

#### FAX NUMBERS:

Administration: (415) 289-4167  
Recreation: (415) 289-4189

Community Development: (415) 339-2256

Library: (415) 331-7943  
Public Works: (415) 289-4138

cities should be acknowledged for that effort based on the performance of the local housing market and the total number of permits issued.

We appreciate the opportunity to provide the Sausalito perspective regarding the RHNA methodology. Please forward this letter to the ABAG Executive Board prior to its July 19, 2012 meeting.

Sincerely,



D. Michael Kelly  
Mayor of the City of Sausalito

cc: Councilmembers  
Adam Politzer, City Manager  
Jeremy Graves, Community Development Director  
Lilly Schinsing, Associate Planner  
Ken Kirkey, ABAG Director of Research and Planning

SANTA CLARA CONFIDENTIAL



June 28, 2012

Ken Kirkey, Director of Planning and Research  
Association of Bay Area Governments  
PO Box 2050  
Oakland, CA 94604-2050

Sent via email: [RHNA\\_Feedback@abag.ca.gov](mailto:RHNA_Feedback@abag.ca.gov)

RE: Regional Housing Needs Allocations (RHNA 2014-2022)

Dear Mr. Kirkey

Thank you for the May 17, 2012 memo regarding the 2014 RHNA methodology and ABAG staff's recommendations on the draft allocations. Although we are concerned with certain aspects of the recommendation at this time, we are preliminarily supportive of the RHNA share for the City of Santa Clara.

During past RHNA cycles, the City of Santa Clara has accepted and been committed to providing our RHNA fair share of housing. The City has demonstrated this commitment by introducing new housing opportunity areas in our City over the course of our 2010-2035 General Plan (adopted in November 2010). The General Plan includes hard fought victories for conversion of industrial lands to significant acreage of new residential and mixed-use neighborhoods, situated near the transit and job centers within the City. In addition, we consider ourselves to be a champion of affordable housing and are always seeking ways to improve our affordable housing policies and programs. The City's commitment to much needed housing remains strong despite not only the California State Legislature's action to terminate redevelopment agencies (2011), but also the State Court's decision in the Palmer v. City of Los Angeles (2009) case.

According to the draft allocations, between 2014 and 2022 the City is expected to plan for and provide 3,812 housing units. If the current economic cycle continues, City staff preliminarily believes this overall figure is realistically achievable by 2022.

However, the RHNA calls for 2,173 (57%) of those units within the City of Santa Clara to be very low- to moderate-income level housing units. This substantial percentage of affordable housing is not feasible to attain given the current development tools at the City's disposal. Simply stated, State level legislative and judicial actions have substantially undermined or eliminated our primary affordable housing development incentives and mechanisms. While we still have the ability to require 10% of all new housing development to be affordable on the ownership side, this will not be enough to achieve 2,173 units by 2022, nor can ownership housing realistically achieve the goal for income levels below 90-100 percent of median income. Based on this, we contend that the 2014 RHNA affordable allocations are not reflective of the inability of local jurisdictions to now regulate or finance the

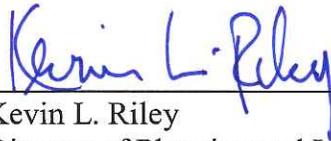
Ken Kirkey, Director of Planning and Research  
May 2012 Draft RHNA Allocations  
June 27, 2012  
Page 2

development of affordable housing, unless the State can make suitable and concurrent regulatory and/or funding commitments to help local agencies support affordable home development.

Santa Clara recognizes the City's obligation to help solve regional problems at the local level, and have actively undertaken programs to proactively address them through the 2010-2035 General Plan. We appreciate the opportunity to comment on the draft RHNA methodology under consideration and respectfully ask that these comments be seriously considered.

Should you have any questions, please do not hesitate to contact Steve Lynch, City Planner, directly at (408) 615-2452 or [slynch@santaclaraca.gov](mailto:slynch@santaclaraca.gov). We respectfully submit these comments, and ask that they be seriously considered.

Thank you.



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Kevin L. Riley  
Director of Planning and Inspections

I:\PLANNING\HOUSING\2014-22 RHNA Process\ABAG - RHNA Letter June 29 2012 (2).doc

cc: Mayor and Council  
Jennifer Sparacino, City Manager  
Jeff Pederson, Housing Division Manager

**Athena Ullah - Fwd: RE: PRA Request - Town of Monte Sereno RHNA**

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**From:** Hing Wong  
**To:** Kenneth Moy  
**Date:** 6/27/2012 2:44 PM  
**Subject:** Fwd: RE: PRA Request - Town of Monte Sereno RHNA  
**CC:** Athena Ullah

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Ken -

I think it can be handled via Athena who is collecting all of the RHNA comments. ABAG will give a response to all comments in the near future and this can be one of them.

Hing Wong, AICP

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Senior Regional Planner, Association of Bay Area Governments (ABAG)  
Vice President of Public Information, APA California

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P.O. Box 2050, Oakland, CA 94604-2050

☎ 510.464.7966 | 📠 510.433.5566 | ✉ [hingw@abag.ca.gov](mailto:hingw@abag.ca.gov)

>>> Kenneth Moy 6/27/2012 2:39 PM >>>

Hing, I am inclined to treat this latest missive from Mr. Stanley as a comment on the Draft RHNA Methodology. The result of which would be for me to tell him so and then turn it over to you. Agreed?

Ken M

\*\*\*\*\*

This email and any files transmitted with it may contain privileged or otherwise confidential information. If you are not the intended recipient, or believe that you may have received this communication in error, please advise the sender via reply email and delete the email you received.

\*\*\*\*\* >>>

On 6/27/2012 at 2:08 PM, in message  
<4759EB98EE6B2E4B97E0855BA86CC753012B39B29C@stanprop08.stanprop.com>, Russ Stanley  
<Russ@stanprop.com> wrote:

[Mr. Moy, thank you for your help in the past answering questions regarding Monte Sereno.](#)

[A question has arisen that your assistance is required to answer. The attached documents detail the 2014-2022 RHNA requirements for Monte Sereno. If you look at the overview of the SCS\\_RHNA Methodology attached under Step 3 it discusses "Fair Share Scoring to Growth in Non-PDA Areas". Step 3 indicates that past RHNA Performance \(1999-2006 for very low income and low income\) is a determining factor in calculating final RHNA needs for a jurisdiction.](#)

[Can you please answer the following questions:](#)

[A\) Determination as to whether Monte Sereno was given full credit for RHNA](#)

compliance in the '99-'06 period under step 3;

B) Please provide the complete calculation used by ABAG in scoring;

C) Please indicate whether Monte Sereno is located within a Priority Development Area or Non PDA

Thank you for your time and attention to this matter.

Regards,

Russ Stanley

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**From:** Kenneth Moy [mailto:Kennethm@abag.ca.gov]  
**Sent:** Wednesday, April 11, 2012 10:55 AM  
**To:** Russ Stanley  
**Subject:** Re: PRA Request - Town of Monte Sereno

Mr. Stanley,

I have attached a mass mailing letter that accompanied the report (also attached) re the RHNA for the jurisdictions in the region. Our usual protocol is to send such mass mailings to every jurisdiction, including Monte Sereno. However, we have no further documentation to that effect.

Regards,

Ken Moy

>>> On 4/6/2012 at 3:40 PM, in message <4F7F70DF.5BB : 14 : 40667>, Kenneth Moy wrote:

Mr. Moy, my earlier PRR request I had requested correspondence to Monte Sereno it you were unable to locate any. How did you transmit the RHNA allocation to each city? I would assume it was through a letter to the city?

Thanks for the websit link. Does that link contain the formula/calculation to be applied to Monte Sereno.

Thanks foe the help.

Regards, Russ Stanley

Sent from my iPhone, please excuse the typos.

On Apr 6, 2012, at 11:21 AM, "Kenneth Moy" <[Kennethm@abag.ca.gov](mailto:Kennethm@abag.ca.gov)> wrote:

Mr. Stanley:

The fifth RHNA cycle for the San Francisco Bay region is still a work in progress. The following web page will provide you with access to all public documents produced in connection with this ongoing effort:

[http://www.onebayarea.org/plan\\_bay\\_area/housing.htm](http://www.onebayarea.org/plan_bay_area/housing.htm)

The draft RHNA methodology and the draft allocations for individual jurisdictions are scheduled for release by ABAG's Executive Board meeting on May 17 at 7 PM at a venue to be determined. After a 60 day public comment period, ABAG will adopt the final methodology and release the final allocations at the July 19 meeting of ABAG's Executive Board. Documentation of the draft and final methodologies and allocations will be distributed at or prior to the meetings at which they will be considered. Any such documentation will also be posted to the web page referenced above.

The proposed draft methodology under development and discussion by the Housing Methodology Committee (see website for information on its role and meetings to date) and ABAG staff is not the same as the methodology used for the fourth RHNA cycle.

Kenneth Moy  
Legal Counsel  
ABAG

>>> On 4/3/2012 at 3:23 PM, in message <4F7B7869.5E6 : 14 : 40667>, Kenneth Moy wrote:

Mr. Moy, perhaps you can provide us the necessary formula for calculating Monte Sereno's RHNA for the 2014-2022 period based upon HCD's letter to ABAG dated February 24, 2012 (attached) which calculates total demand at 187,900 units for the 8.8 year projection. Assuming that the same formula were utilized going forward as was used in the latest period '07-'14 we would like to know what Monte Sereno's housing requirement would be?

In absence of your ability to calculate Monte Sereno's requirement, please provide the formula used in the '07-'14 period so that we may calculate it.

Thank you, Regards, Russ Stanley

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**From:** Kenneth Moy [<mailto:Kennethm@abag.ca.gov>]

**Sent:** Monday, March 19, 2012 4:27 PM

**To:** Russ Stanley

**Subject:** PRA Request - Town of Monte Sereno

Dear Mr. Stanley:

In response to your request for copies of any correspondence (including mass

mailings) between ABAG and the Town of Monte Sereno from January 1, 2006 to the present regarding the Housing Element Law or the regional housing needs allocation, I have attached the following:

- One file [*Monte Sereno-joined Subregion-Santa Clara County 10-4-06 Brian Bloventhal email.doc*] is an email thread wherein Monte Sereno described its interest in being included in a possible subregion that did not form
- Two files [*09-15-06 Factors Survey - form.pdf* and *2006 RHNA Survey Summary formatted.xls*]: the first is the survey sent to all jurisdictions in the region, including Monte Sereno and the second is a report on the survey results that indicates that Monte Sereno did not respond to the survey.
- Two files [*RHNA Public Comments as of 1-18-07.pdf* and *List of ltrs & emails rec'd.doc*] on all the jurisdictions' and public comments for the RHNA process: these files indicate that Monte Sereno did not write a comment letter.
- One file [*Exec Brd-RHNA 9-21-06.ppt*] on the slideshow presentation to the Executive Board which may have been mass distributed to ABAG members.
- One file [*ABAG Primary Housing Contacts.pdf*] on the local housing contacts that includes a contact for Monte Sereno
- Eight files [*all other files attached*]: all other mass mailings meeting the request parameters.

ABAG has now completed its response to your request.

Regards,  
Ken Moy



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## CITY OF SAN RAMON

2222 CAMINO RAMON  
SAN RAMON, CALIFORNIA 94583  
PHONE: (925) 973-2500  
WEB SITE: [www.sanramon.ca.gov](http://www.sanramon.ca.gov)

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June 26, 2012

Ken Kirkey, Director of Planning and Research  
Association of Bay Area Governments  
101 Eighth Street  
Oakland, CA 94607

**SUBJECT: Comments on the Association of Bay Area Governments (ABAG) 2014-2022  
Draft Regional Housing Needs Allocation (RHNA) Methodology**

Dear Ken:

Thank you for the opportunity to review and comment on the draft RHNA Methodology. The following comments have been prepared for inclusion in the public record in anticipation of the ABAG Executive Board meeting on July 19, 2012.

Overall, the City of San Ramon supports ABAG's and MTC's effort to bring a greater jobs/housing balance to the region. As you may be aware, San Ramon has made significant progress in the last decade to bring our community closer to reaching this regional goal. Between 2000 to 2008, the jobs/housing ratio moved significantly lower from 1.51 to 1.24 in the City of San Ramon. With the policies set forth in the newly adopted *San Ramon General Plan 2030*, including the designation of two Priority Development Areas (PDAs), it is anticipated that San Ramon will reach its goal of a 1.05 jobs/housing ratio by General Plan buildout in 2030. Additionally, the City's Air Quality and Greenhouse Gas Element and associated Climate Action Plan will ensure that the anticipated balanced growth will not conflict with the implementation of AB 32—the Global Warming Solutions Act of 2006.

In general, San Ramon finds the main components that make up the RHNA methodology acceptable with exception of the income allocation strategy and the transit factor used for non-PDA areas. Our understanding is that the income allocation strategy determines the difference between the regional proportion of households in an income category and a jurisdiction's proportion in that category. This difference is then multiplied by 175 percent in an effort to be more closely aligned a jurisdiction's income distribution with the region's distribution.

San Ramon's concern over the income allocation is the use of an overly-aggressive 175 percent multiplier. The choice of 175 percent appears to be arbitrary and comes with little explanation as to

why such a high value was selected. The primary justification provided in the previous housing cycle was a 175 percent adjustment made the most meaningful adjustment for jurisdictions that currently do not have a large supply of affordable housing. San Ramon questions why a 100 or 150 percent adjustment was not studied as an alternative for this cycle. Has ABAG analyzed the construction data since the factor's inclusion in 2009 to determine what impact this adjustment factor has had on creating more affordable units in affluent communities? Is there historical data that supports why an adjustment of 175 is ideal to reaching the stated objective?

The 175 percent income adjustment is unrealistically high and ultimately defeats the region's goal of meeting the housing needs in a sustainable and balanced approach. For example in San Ramon, our 2009 to 2014 below-market rate allocation is over 2,600 units which equals approximately 75 percent of our 3,463 total assigned units. It is impractical to expect that a community of less than 25,000 residential units (in 2008) could add 2,600 new "affordable" units in a 7.5 year span. By comparison, in communities with successful inclusionary housing ordinances where 25 percent of new development is reserved for below-market rate units, San Ramon will need to approve over 10,000 new units in 7.5 years to even come close to adding the requisite 2,600 affordable units in our community.

It appears this same flawed methodology is being repeated in the impending housing cycle. With yet another estimated allocation of over 75 percent of our draft RHNA as below-market rate units, the message that the regional agencies sends to our community is mixed: 1) San Ramon should plan for a much higher production of units beyond what we are allocated in order to reach our exorbitantly high allocation of affordable units, contrary to the region's sustainable land use goal, or 2) we will keep assigning an unrealistic RHNA, knowing that these allocations can never be met thus resigning the region to face an even greater shortage of housing units in 2023.

With regards to the fair-share component, San Ramon would encourage the Board to give more weight to the transit factor in non-PDA areas. Given the intent of SB 375 to more closely align land use and transportation planning, not enough emphasis is being made to allocate units to jurisdictions with no PDAs. By using a Jobs-Housing Connection Strategy and an income allocation component, this already heavily burdens jurisdictions that have a high employment base and lower percentage of affordable units to take a greater share of the region's allocation. If a community opted-out of establishing a PDA and also has a strong network of transit, this factor should carry more weight because jobs and affordability are already greatly emphasized in other components of the methodology.

The City of San Ramon encourages the Executive Board to take into consideration the above comments and decrease in the income adjustment percentage as well as weight the transit factor more heavily in non-PDA areas. If you have any questions regarding the information in this letter, please contact Cindy Yee, Associate Planner at (925) 973-2562 or via e-mail: [cyyee@sanramon.ca.gov](mailto:cyyee@sanramon.ca.gov).

June 26, 2012

Page 3

Sincerely,



Phil Wong  
Planning/Community Development Director

Cc: City Council/City Manager  
Debbie Chamberlain, Planning Manager  
Cindy Yee, Associate Planner

c12.045 Ken Kirkey ABAG RHNA 2014-2022 Draft Methodology Comment Letter

## Athena Ullah - Fwd: RHNA Methodology

---

**From:** "Hanson Hom" <hhom@ci.sunnyvale.ca.us>  
**To:** <hingw@abag.ca.gov>  
**Date:** 6/25/2012 9:42 AM  
**Subject:** Fwd: RHNA Methodology

---

### Hanson Hom

Director of Community Development  
City of Sunnyvale  
P.O. Box 3707  
456 W. Olive Avenue  
Sunnyvale, CA 94088-3707  
408-730-7450



Save the environment. Please don't print this email unless you really need to. 

>>> On 6/22/2012 at 5:42 PM, Hanson Hom <hanson\_hom@ci.sunnyvale.ca.us> wrote:  
Hing, Justin:

If you are not the person who should receive this request, please forward accordingly. Much thanks.

We were reviewing the draft RHNA methodology and the resulting numbers in Santa Clara cities and are honestly perplexed about the draft numbers. The RHNA number for Sunnyvale has proportionately increased more significantly than for similar adjacent cities. This raises questions about the validity of the methodology and/or the assumed data for Sunnyvale. In order to properly comment on the methodology which is the immediate focus, please provide the calculation on how the draft methodology was applied to Sunnyvale to arrive at 5,574 units, which is an increase of about 20 percent from the previous cycle. This would be most helpful so that we can provide ABAG with meaningful and constructive comments by June 30 as requested. Without this more specific information, we are not clear whether our concerns pertain to the methodology or the data.

Additionally, one of our Councilmembers recently attend an ABAG meeting and was under the impression that nominating a PDA would influence or increase a city's RHNA number. A clarification of how a PDA designation affects, if any, a city's RHNA numbers is also requested. I was under the impression that it does not have an effect and that it primarily affected eligibility for certain priority grant funding that is tied to PDAs such as the OBAG program.

Thanks,

### Hanson Hom

Director of Community Development  
City of Sunnyvale  
P.O. Box 3707  
456 W. Olive Avenue  
Sunnyvale, CA 94088-3707  
408-730-7450



Save the environment. Please don't print this email unless you really need to. 



**CITY OF NEWARK, CALIFORNIA**

37101 Newark Boulevard • Newark, California 94560-3796 • (510) 578-4000 • FAX (510) 578-4306

June 25, 2012

Ken Kirkey  
Director of Planning and Research  
Association of Bay Area Governments  
101 Eighth Street  
Oakland, CA 94607

RE: Regional Housing Needs Allocation Methodology

Dear Mr. Kirkey,

I am writing to convey Newark's concerns about the proposed Regional Housing Needs Allocation Methodology.

The proposed Regional Housing Needs Allocation (RHNA) methodology would assign massive and disproportionate increases in housing growth to our community. Newark is allocated 1,149 units, a 33% increase in housing units over the previous RHNA cycle -- a 52% increase in our share of regional housing.

This increased allocation is of particular concern because Newark has no fixed transit and minimal bus transit; and Newark's only proposed transit project has been deleted from infrastructure planning. In the "Plan Bay Area" Process, regional agencies removed the voter approved Dumbarton Rail Service from the infrastructure plan. Newark's 2,500 unit Dumbarton Transit Oriented Development (TOD) was to be served by the now deleted service. This disinvestment undermines our TOD and should have resulted in a massive **decrease** in our housing allocations in the SCS, however regional agencies ignored Newark's repeated objections and did not adjust the land use to reflect the infrastructure disinvestment.

As further evidence of the flaw in the SCS process and RHNA methodology, Newark's 33% increase is much higher than adjacent and similar cities that have substantial existing and proposed transit service:

- Fremont, which has an existing BART Station and an additional two stations planned has only a 13% increase in RHNA allocation.
- Milpitas with existing light rail and proposed BART station has its RHNA allocation increased by only 28%.
- Hayward with 2 BART stations RHNA allocation had only a 28% increase.
- Union City with a BART and a proposed Multimodal station has had their RHNA allocation **decreased** by 43%.

Given that SB 375 mandates connection between land use and infrastructure investment, the fact that housing allocations are increasing in Newark at the very time that transit investment is decreasing is clear evidence of a fundamental problem in the process. The reason for this error lies with a defective SCS process that, in direct contravention of SB 375, failed to adjust the land use allocations to reflect infrastructure changes. This issue should be no surprise to ABAG, since in our April 26, 2012 letter commenting on this error in the SCS we stated: "if the Dumbarton Rail Service is not recommended for inclusion in the RTP network, the allocation of housing in Newark **must** be dramatically reduced." ABAG and MTC chose to ignore our objections, and the defective SCS and this distorted RHNA allocation are the inevitable results. Since the proposed RHNA methodology relies upon the defective SCS land use assumptions, the RHNA methodology perpetuates the defective process. Unless modified, the proposed RHNA allocation process would perpetrate the errors of the SCS process and would be in conflict with State law.

Ideally the SCS process should be reevaluated to take the changes in infrastructure into account in the allocation of housing growth. While Newark will diligently pursue the goal of fixing the SCS error, we recognize that corrections are not likely at this stage in the process. Therefore we suggest that the RHNA Proposed Methodology be adjusted to address this issue to at least prevent its perpetuation.

#### **Proposed Modification of RHNA Methodology**

The methodology should contain a filter that assures that no community that has been subjected to significant transit disinvestment could have its RHNA allocation increased over the 2007-2014 levels. There is no simply justification for increasing the housing allocations to an area that is simultaneously having its only proposed fixed transit service defunded.

The reliance of your methodology on a defective SCS process has led to the assignment of massive growth to a community without effective transit. This outcome is unreasonable, illogical and is out of step with State legislation. Please make changes to the methodology that will result in a reasonable allocation of housing demand to Newark. I would be happy to meet with you to discuss potential solutions to this issue. We will also avail ourselves of your Revision and Appeals Process to address this issue. Thank you for your attention to this issue. If you wish to discuss this further please contact me by email at [Terrence.grindall@newark.org](mailto:Terrence.grindall@newark.org) or by telephone at 510-578-4208.

Sincerely,

  
Terrence Grindall  
Community Development Director

cc: John Becker, Newark City Manager, 37101 Newark Boulevard, Newark, CA 94560  
Doug Kimsey, Metropolitan Transportation Commission, 101 8<sup>th</sup> Street, Oakland, CA 94607



# TOWN OF LOS GATOS

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## OFFICE OF THE TOWN MANAGER

(408) 354-6832

Manager@LosGatosCA.gov

CIVIC CENTER  
110 E. MAIN STREET  
P.O. Box 949  
LOS GATOS, CA 95031

June 21, 2012

VIA First Class Mail

Mr. Ken Kirkey, Planning Director  
Association of Bay Area Governments  
101 Eighth Street  
Oakland, CA 94607

**RE: Draft RHNA Methodology - Town of Los Gatos Comments**

Dear Mr. Kirkey:

The Town of Los Gatos appreciates the opportunity to provide comments on the 2014-22 Draft RHNA methodology. The Town understands the challenge of developing a RHNA distribution methodology that the 101 Bay Area municipalities find equitable and acceptable. However, the Town continues to have a concern with the proposed minimum housing floor factor of the fair share component.

In March 2012, the West Valley Cities of Saratoga, Campbell, Cupertino, Monte Sereno, and the Town of Los Gatos sent you a letter outlining our concerns with the fair share distribution component of the ABAG RHNA methodology. The letter stated that the five agencies believe that 40% minimum household formation should be eliminated. The concern was not with the allocation of affordable units to our jurisdictions, but rather assigning a larger share of units in the 2014-22 cycle than in the previous 2007-14 cycle to the smaller Santa Clara County cities. These smaller cities are generally built-out and do not have sufficient vacant or under-developed land to meet the Priority Development Area (PDA) goals.

Although the proposed RHNA for Santa Clara County is approximately only 269 units more than the previous 2007-14 Cycle, there are a number of cities within the County that have identified PDAs, but have an overall lower amount of units allocated in the upcoming cycle. Pursuant to the Plan Bay Area, these PDAs are where new residential and job growth will be focused. For example, the Cities of Mountain View and Palo Alto both have PDAs, but their overall projected units are lower than in the previous cycle. This is compared to an increase in projected units for the Cities of Los Altos, Saratoga, Los Altos Hills, Monte Sereno and the Town of Los Gatos, which do not contain PDAs.



The 40% minimum housing floor factor contributes to this imbalance in the RHNA distribution, and the methodology appears to be inconsistent with the goals of the Sustainable Communities Strategy (SCS) and Plan Bay Area. Consistent with the SCS goals, the projected housing growth should be planned for the communities that are served by transit, are projecting employment growth, and will be eligible for the majority of transportation funding. These smaller bedroom communities do not possess these characteristics.

The Town of Los Gatos respectfully requests forwarding the Town's concerns to the ABAG Executive Board for its consideration during the review and approval of the final RHNA methodology on July 19, 2012.

Sincerely,

A handwritten signature in black ink, appearing to read 'Greg Larson', with a long horizontal flourish extending to the right.

**GREG LARSON**  
Town Manager

GL:jj

## MEMORANDUM

---

**TO:** Parisa Fatehi-Weeks, Public Advocates

**FROM:** Alex Karner and Deb Niemeier, Department of Civil and Environmental Engineering,  
UC Davis

**DATE:** May 24, 2012

**RE:** Alternative scenarios, affordable housing, and vehicle-miles traveled in the Bay Area

---

### **A. Introduction**

Under SB 375, California's metropolitan planning organizations (MPOs) must reduce per capita greenhouse gas (GHG) emissions, primarily by coordinating transportation and land use planning in an effort to pair compact growth with high quality transit. This coordination is embodied in the sustainable communities strategy – a new component of the regional transportation plan that provides not only a vision for the future transportation system but also signals the kinds of land uses needed to achieve reductions in vehicle-miles traveled (VMT).

The potential for gentrification and displacement to occur in urban spaces simultaneous with the pursuit of otherwise laudable environmental goals is now well-documented.<sup>1</sup> Recent work has identified ways in which the process of gentrification and the demographic changes it elicits actually work against environmental goals. These studies consistently find evidence of growing affluence in neighborhoods that receive improved transit service, including increasing proportions of college graduates, rising median incomes, higher automobile ownership, and reduced transit mode share.<sup>2</sup> The research on racial demographic effects is more mixed, with some studies concluding that local transit investments lead to a reduction in proportions of people of color,<sup>3</sup> and others finding no evidence of changing racial demographics.<sup>4</sup> As one example, an analysis of Canada's three largest cities found that while gentrification was associated with increases in non-motorized mode share, it was also associated with decreases in public transit and carpool use. Most problematically, the mode share for "auto as driver" was also associated positively with gentrification.<sup>5</sup> Taken together, these studies suggest that merely producing dense, mixed use developments well-served by transit is not enough to reach the policy goals of reducing VMT and thus GHG emissions.

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<sup>1</sup> Sarah Dooling, "Ecological Gentrification: A Research Agenda Exploring Justice in the City," *International Journal of Urban and Regional Research* 33, no. 3 (2009); Noah Quastel, "Political Ecologies of Gentrification," *Urban Geography* 30, no. 7 (2009).

<sup>2</sup> Matthew E. Kahn, "Gentrification Trends in New Transit-Oriented Communities: Evidence from 14 Cities That Expanded and Built Rail Transit Systems," *Real Estate Economics* 35, no. 2 (2007); Stephanie Pollack, Barry Bluestone, and Chase Billingham, "Maintaining Diversity in America's Transit-Rich Neighborhoods," (Dukakis Center for Urban and Regional Policy, 2010); Kara S. Luckey, "Assessing the Effectiveness of Approaches to the Allocation of Low-Income Housing Tax Credits in Proximity to Rail Transit" (paper presented at the 91st Annual Meeting of the Transportation Research Board, Washington, DC, 2012).

<sup>3</sup> ———, "Approaches to the Allocation of LIHTCs".

<sup>4</sup> Pollack, Bluestone, and Billingham, "Maintaining Diversity."

<sup>5</sup> Martin Danyluk and David Ley, "Modalities of the New Middle Class: Ideology and Behaviour in the Journey to Work from Gentrified Neighbourhoods in Canada," *Urban Studies* 44, no. 11 (2007).

As part of its equity analysis for the current regional plan update, known as *Plan Bay Area*, the Metropolitan Transportation Commission (MTC) reports that there will be substantial displacement pressures on “communities of concern” in the Bay Area in future years.<sup>6</sup> Specifically, MTC’s analysis identifies concentrations of overburdened renters in traffic analysis zones (TAZs)<sup>7</sup> where greater than 15% of housing units are occupied by renters paying more than 50% of their income on housing. TAZs that meet these thresholds and are projected to grow by more than 30% by 2035 are considered at risk of increased displacement pressure. The MTC analysis results show that 30% to 40% of the base year’s overburdened renters in communities of concern are at risk compared to 7% to 10% in the remainder of the region.

MTC has also identified that the proposed transportation investment and land use strategies get only part of the way toward the 2035 GHG emissions reduction goal. There is a five percentage point gap remaining that MTC is proposing to address through a series of transportation policy measures. Despite MTC’s own analysis on displacement risk, discussions around bridging this gap have focused almost exclusively on achieving additional per capita GHG reductions through policy initiatives like the promotion of electric vehicles.<sup>8</sup> In focusing on vehicle technology, MTC overlooks an important opportunity: affordable housing can be an effective tool for meeting GHG emissions reductions while simultaneously meeting a number of other objectives by reducing other VMT-related externalities including congestion costs, deaths and injuries from collisions, and public health costs like obesity.

The remainder of this memo uses travel modeling data produced by MTC to quantify differences in travel behavior by income categories. We argue that equitable housing distributions that provide options for residents of different income levels can be an effective VMT reduction strategy.

## **B. Income, automobile ownership and VMT**

The Association of Bay Area Governments (ABAG) has noted that residents of affordable housing drive less and own fewer cars than those who do not live in affordable housing.<sup>9</sup> Precisely how much less they drive can be identified with the travel demand modeling data developed for the alternative *Plan Bay Area* scenarios using low-income status as a proxy for affordable housing residence.<sup>10</sup> Table 1 shows vehicle ownership and VMT per capita at the household level when looking at income effects for both 2005 and future years. Consistent with SB 375, all future scenarios suggest that households, on average, will own fewer vehicles and

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<sup>6</sup> MTC, “Plan Bay Area Equity Analysis Overview and Equity Analysis Scorecard,” <http://www.onebayarea.org/pdf/EquityAnalysisOverview.pdf>.

<sup>7</sup> A unit of geography used to model travel approximately equivalent to a census tract.

<sup>8</sup> See discussion at the May 11, 2012 joint meeting of the MTC Planning Committee and the ABAG Administrative Committee. Out of \$685 million budgeted to help MTC reach its 2035 GHG emissions reduction target, 60% is directed at electric vehicle subsidization.

<sup>9</sup> Association of Bay Area Governments, “Myths & Facts About Affordable and High-Density Housing,” <http://www.abag.ca.gov/services/finance/fan/housingmyths2.htm>.

<sup>10</sup> Five alternative scenarios were designed for Plan Bay Area comprising two transportation investment scenarios paired with two land use scenarios. The first two, Initial vision and Core capacity, assume unlimited resources for housing development in the Bay Area. The latter three are based upon realistic planning assumptions regarding the total amount of housing growth that can be accommodated in the region. Each varies slightly in precisely where growth is located. Further information is available at: <http://www.onebayarea.org/pdf/ScenarioAnalysisOverview.pdf>.

that VMT per capita across all income groups will decline. However, as expected, we find that vehicle ownership and VMT per capita increases as household incomes increase.

**Table 1 Comparison of modeled scenarios – Automobile ownership and VMT per capita by income.**

	Average vehicles per household				
	Income quintile 1 ( < 26,000) <sup>a</sup>	Income quintile 2 (26,000 – 52,000)	Income quintile 3 (52,000 – 80,000)	Income quintile 4 (80,000 – 124,000)	Income quintile 5 (> 124,000)
Base year, 2005	1.010	1.533	1.821	2.10	2.15
Initial vision	0.947	1.447	1.738	2.01	2.09
Core capacity	0.917	1.445	1.742	2.01	2.08
Focused growth	0.948	1.493	1.795	2.06	2.11
Constrained core capacity	0.942	1.487	1.790	2.06	2.11
Outward growth	0.988	1.521	1.815	2.08	2.12
	Average VMT per capita				
Base year, 2005	8.78	13.27	17.13	19.15	19.65
Initial vision	8.09	12.18	15.40	17.30	18.20
Core capacity	7.91	12.22	15.48	17.26	17.99
Focused growth	7.76	11.94	15.07	17.02	17.83
Constrained core capacity	7.69	11.84	14.98	16.95	17.83
Outward growth	8.07	12.24	15.35	17.27	18.00

<sup>a</sup>Quintile bounds are calculated for each scenario, so the values that define each category are approximate.

The empirical evidence of gentrification discussed earlier suggests that median income levels and vehicle ownership are likely to rise in areas where transit service improves, and these increases have been linked to increasing risk of gentrification and displacement.<sup>11</sup> In future years, MTC has identified that transit service improvements will be focused largely on priority development areas (PDAs) – those areas targeted to receive streamlined environmental review for housing projects with densities conducive to frequent transit service. Using data provided by MTC, we classified 195 TAZs as being part of a PDA and compared the median incomes for PDA and non-PDA areas.<sup>12</sup> Table 2 shows that median income across the PDAs increase faster than in the non-PDAs and faster than the entire region from the base year to each of the future year scenarios. The results are consistent with MTC’s equity analysis: PDAs will likely experience gentrification and increasing displacement risk as *Plan Bay Area* is implemented.

<sup>11</sup> Pollack, Bluestone, and Billingham, “Maintaining Diversity.”

<sup>12</sup> A TAZ was considered to be part of a PDA if greater than 50% of its area overlapped part a PDA classified as “planned” and “final” in the GIS layer (according to the attributes PlanStatus and ABAGStatus, respectively).

**Table 2 Median income, 2000\$.**

	PDA's	Non-PDA's	Entire region
Base year, 2005	43,800	68,200	65,000
Initial vision	48,000	67,000	64,400
Core capacity	50,000	68,000	65,000
Focused growth	48,310	68,000	65,000
Constrained core capacity	48,600	68,000	65,000
Outward growth	48,200	68,010	65,200

The gentrification literature discussed in the introduction also suggests that new residents in gentrifying areas will be less likely to take transit and more likely to own greater numbers of automobiles than previous residents. We can test this prediction by comparing low-income households to all other households in PDAs and non-PDA TAZs in terms of VMT per capita (Table 3). As we might expect, VMT per capita decreases from the base year when compared to each forecast scenario for both low-income and all other households. That is, households in PDAs have substantially lower VMT per capita than the rest of the region in both the base and forecast years. The critical aspect to this analysis, however, is that the rate at which low-income households reduce VMT per capita is slightly higher than all other households in both PDAs and non-PDAs in all future year scenarios (final row of Table 3). Automobile ownership results show similar, across the board reductions for PDAs, with low-income households owning fewer automobiles than all other households in both PDAs and the remainder of the region. Locating residents in PDAs is clearly an important strategy for achieving SB 375’s GHG targets, but the future year non-low income households generally do not reduce driving or automobile ownership as much as low-income households.

**Table 3 Comparison of modeled scenarios – VMT per capita.**

	VMT per capita (PDA's)		VMT per capita (other TAZs)	
	Low-income households <sup>a</sup>	All other households	Low-income households <sup>a</sup>	All other households
Base year, 2005	5.51	11.04	9.54	18.72
Initial vision	5.11	10.23	8.70	17.29
Core capacity	4.78	9.87	8.54	17.20
Focused growth	4.88	9.96	8.42	16.85
Constrained core capacity	4.94	9.89	8.40	16.82
Outward growth	5.07	10.26	8.64	17.05
	Average reduction relative to 2005 (%)			
	10.0	9.0	10.5	9.0

<sup>a</sup>Low-income households classified according to the US Census definition<sup>13</sup> based on household size and income threshold. Consistent with MTC practice, 200% of the threshold is used.

One caveat is that these results may not fully represent market dynamics that will result from improved transit service, since the allocations of different household types by income are established prior to running the travel model. In addition, representations of travel behavior are

<sup>13</sup> US Census Bureau, “Poverty Data - Poverty Thresholds,” <http://www.census.gov/hhes/www/poverty/data/threshld/index.html>.

based upon cross-sectional analysis sometimes extending as far back as 1990.<sup>14</sup> The gentrification literature argues that subsequent “waves” of gentrifying individuals bring with them different travel behaviors; these behaviors would tend to transcend classification based upon income alone to include difficult-to-quantify properties such as politics, ideologies and values.<sup>15</sup> Later waves are potentially less inclined to reduce automobile ownership and VMT than are earlier waves. These factors are generally not included in a travel demand model. For this reason, the travel model results might underestimate the VMT per capita and automobile ownership figures expected to result in future years in gentrifying, transit rich areas.

### **C. Links between affordable housing and VMT**

It seems self-evident that affordable housing should not just be placed anywhere. More equitable distributions of housing can be expected to lead to lower VMT per capita based on the land uses likely to surround mixed income communities and also because of the relationships between VMT and income noted above. We can quantify the equitability of a housing distribution using the Gini coefficient. The Gini coefficient is a well-accepted measure of population inequality which varies from a perfectly equal distribution of some good (zero) to a perfect concentration of that good with one individual or group (one).<sup>16</sup> Those TAZs with more equitable housing distributions (where there are equal numbers of each household type by income) will have Gini coefficients closer to zero, while those with inequitable distributions will have Gini coefficients closer to one.

Table 4 summarizes the VMT per capita for each future year scenario and the base year according to quintiles of the Gini coefficient calculated at the household level.<sup>17</sup> Each column represents the average VMT per capita for households representing 20% of the total in each scenario. Housing distributions become increasingly inequitable moving from left to right in the table. The results clearly indicate that TAZs with more equitable housing distributions have lower VMT per capita. Further analysis reveals that the TAZs with the highest Gini coefficients (most inequitable) disproportionately represent households in the highest income groups. For the initial vision scenario, the TAZs with the most inequitable housing distributions (i.e. Gini quintile 5) had an average of 51% of total households in the highest income category and only 10% in the lowest income category. TAZs that had the most equitable housing distributions (i.e. Gini quintile 1) had an average of 23% of households in the highest income category and 20% in the lowest.

To the extent that median incomes rise in PDAs and similarly transit rich areas in the urban core in forecast years, VMT per capita is likely to increase. Maintaining and improving the equitability of the housing distribution is one method that MPOs can use to ensure that per capita VMT remains as low as possible. These results indicate that developing more equitable distributions of affordable housing should be included alongside other methods proposed by MTC to meet its SB 375-mandated GHG reduction target.

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<sup>14</sup> MTC, “Travel Model Development: Calibration and Validation (Draft),” (Oakland, CA: Metropolitan Transportation Commission, 2011).

<sup>15</sup> Danyluk and Ley, “Modalities of the New Middle Class: Ideology and Behaviour in the Journey to Work from Gentrified Neighbourhoods in Canada,” 2197-98.

<sup>16</sup> World Bank, “Poverty Analysis - Measuring Inequality,” <http://go.worldbank.org/3SLYUTVY00>.

<sup>17</sup> Quantities of housing types in each of four income categories based on ABAG modeling are used as input into MTC’s travel model for future years. Observed data on income distribution are used for the base year.

**Table 4 VMT per capita by scenario and Gini coefficient quintile.**

*Increasingly inequitable housing distribution* 

	Gini quintile 1	Gini quintile 2	Gini quintile 3	Gini quintile 4	Gini quintile 5
Base year, 2005	14.91	15.10	15.10	17.50	19.03
Initial vision	12.98	13.71	14.35	15.40	18.10
Core capacity	13.11	13.34	14.25	15.66	17.88
Focused growth	12.73	13.22	14.30	15.11	17.59
Constrained core capacity	12.66	13.25	13.93	15.12	17.66
Outward growth	12.85	13.65	14.25	15.70	17.77

One could argue that the differences identified in Table 4 are entirely the result of income effects. We would expect the same results if low-income housing units are disproportionately concentrated in TAZs with low Gini coefficients. To check this hypothesis, we estimated a preliminary spatial autoregressive error model of the logarithm of total VMT at the TAZ level. The modeling results are located in the appendix. The independent variables include, among others, the total number of housing units in the lowest two income categories; this allows us to estimate the effect of affordable housing provision on total VMT (and thus GHG emissions). The interpretation of the estimated coefficient on affordable housing shown in the appendix is that a one percent increase in housing units occupied by the lowest income groups is associated with a 0.07 percent decrease in TAZ-level VMT, all else equal. Said another way, the provision of affordable housing within a TAZ has a high probability of being independent of the income level within that same TAZ and the other variables included in the model. This result suggests that an equitable housing distribution results in lower VMT.

#### **D. Conclusion**

This memo and MTC’s own analysis indicate that gentrification and displacement of low-income residents are likely outcomes in areas expected to receive transit investments over the course of *Plan Bay Area*. We present evidence correlating inequitable housing distributions with higher VMT, suggesting that investment in affordable housing can help to meet SB 375’s GHG reduction goals while mitigating the risk of gentrification and displacement. Additional transportation policies proposed to achieve GHG targets should not be myopically focused on transportation technology. Strategies such as affordable housing provision can help to meet SB 375’s goals while mitigating other transportation externalities.

#### **E. References**

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## **Appendix**

The travel data used to estimate the model shown in Table A 1 were obtained from MTC. Demographic data were also assembled from the 2005-2009 American Community Survey maintained by the US Census.

**Table A 1 Spatial error model on the logarithm of total TAZ-level VMT for the 2005 base year.**

Variable	Coefficient estimate	Standard error <sup>a</sup>
log(median income)	0.01700	0.00354***
log(housing units in the lowest two income categories)	-0.0647	0.00815***
log(total people of color)	-0.01859	0.00861*
log(total zero vehicle households)	-0.0240	0.00448***
log(total workers)	0.0985	0.01340***
log(total population)	0.993	0.01870***
log(total acreage)	0.0370	0.00519***
Peak transit accessibility <sup>b</sup>	-0.0371	0.00315***
Peak non-motorized accessibility <sup>b</sup>	-0.0475	0.00351***
Lambda (spatial error term)	0.1258	0.00256***
Number of observations = 1441		
Pseudo R <sup>2</sup> (Nagelkerke) = 0.96		

<sup>a</sup>Significance is indicated by the following convention: p < 0.001 \*\*\*, p < 0.01 \*\*, p < 0.05 \*

<sup>b</sup>Transit and non-motorized accessibilities are outputs from the travel demand model and are in relative units. They are included merely as controls.

**Athena Ullah - RE: language of the suggestion from my testimony**

---

**From:** Parisa Fatehi-Weeks <pfatehi@publicadvocates.org>  
**To:** Hing Wong <Hingw@abag.ca.gov>, Miriam Chion <MiriamC@abag.ca.gov>  
**Date:** 6/13/2012 7:33 PM  
**Subject:** RE: language of the suggestion from my testimony  
**CC:** Athena Ullah <AthenaU@abag.ca.gov>, Sam Tepperman-Gelfant <stepperman-ge...>  
**Attachments:** PA\_MTC\_memo 20120524.pdf

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Ok, thanks Hing. FYI, I have also attached the memo that I referenced in the testimony.

Here is a brief summary of the memo which shows that equitable distribution of affordable housing can reduce VMT:

*This memo by Alex Karner and Deb Niemeier of UC Davis, as well as an analysis by the Metropolitan Transportation Commission and the Association of Bay Area Governments, indicate that gentrification and displacement of low-income residents are likely outcomes in areas expected to receive transit investments over the course of Plan Bay Area. The memo presents evidence correlating inequitable housing distributions with higher vehicle miles traveled (VMT), suggesting that investment in affordable housing can help to meet SB 375's greenhouse gas (GHG) reduction goals while mitigating the risk of gentrification and displacement. Additional transportation policies proposed to achieve GHG targets should not be myopically focused on transportation technology. Strategies such as affordable housing provision can help to meet SB 375's goals while mitigating other transportation externalities.*

If you or other ABAG staff are interested in contacting the analyst at UC Davis that wrote it, just let me know and I can introduce you.

Thank you,  
 Parisa

Parisa Fatehi-Weeks  
 Public Advocates Inc.

---

**From:** Hing Wong [mailto:Hingw@abag.ca.gov]  
**Sent:** Wednesday, June 06, 2012 4:54 PM  
**To:** Parisa Fatehi-Weeks  
**Cc:** Athena Ullah; Sam Tepperman-Gelfant  
**Subject:** Re: language of the suggestion from my testimony

Parisa -

This is fine. Thanks!

Hing Wong, AICP

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Senior Regional Planner, Association of Bay Area Governments (ABAG)  
 Vice President of Public Information, APA California

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P.O. Box 2050, Oakland, CA 94604-2050

☎ 510.464.7966 | 📠 510.433.5566 | ✉ [hingw@abag.ca.gov](mailto:hingw@abag.ca.gov)

>>> Parisa Fatehi-Weeks <[pfatehi@publicadvocates.org](mailto:pfatehi@publicadvocates.org)> 6/6/2012 3:33 PM >>>  
 Hing,

Since you requested, here is the language of the methodology amendment I made in my public comment:

Every jurisdiction with a median income above the Bay Area average should take-on at least as much of the region's lower-income housing need as it did in the 2007-2014 Planning Period. This would mean shifting some lower-income units from lower-income cities to more affluent cities in exchange for higher-income units. The total RHNA number for each jurisdiction would remain the same.

If I can, I will send you the rest of my comments soon, but this was the key part.

Thanks,  
Parisa

=====  
Parisa Fatehi-Weeks  
Staff Attorney  
131 Steuart Street | Suite 300 | San Francisco CA 94105  
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OFFICE OF THE CITY MANAGER

CITY HALL  
10300 TORRE AVENUE • CUPERTINO, CA 95014-3255  
TELEPHONE: (408) 777-3212 • FAX: (408) 777-3366

June 13, 2012

Mr. Ken Kirkey  
ABAG Director, Planning and Research  
Association of Bay Area Government (ABAG)  
P.O. Box 2050  
Oakland, CA 94604-2050

RE: VTA Cores, Corridors and Station Areas PDA Designation within Cupertino  
Dear Mr. Kirkey,

In response to your letter dated April 18, 2012 the City of Cupertino will continue to support the Priority Development Area (PDA) designation for the VTA Cores, Corridors and Station Area along Stevens Creek Boulevard between Highway 85 and the eastern City limits and a portion of North De Anza Boulevard in Cupertino. Our understanding is that this Priority Development Area (PDA) has added an additional 60 units to our Regional Housing Need Allocation (RHNA) but will qualify Cupertino for the One Bay Area Grant (OBAG) funding related to PDAs.

We would like to encourage ABAG and the MTC to allow cities to add PDAs after the current OBAG funding cycle so that an additional Employment Investment Area in the Homestead Road and North Wolfe Road area may be added to Cupertino. We believe that the area meets the qualifications given the increase in employees due to the development of the new Apple campus, a potential redevelopment opportunity at the Vallco regional mall and the development of a large residential project (Rosebowl) in the Vallco area.

Sincerely,

A handwritten signature in black ink, appearing to read "Amy Chan".

Amy Chan  
Interim City Manager

Cc: Timm Borden, Director of Public Works  
Aarti Shrivastava, Director of Community Development

**Athena Ullah - Income Distribution**

---

**From:** Anda Draghici <adraghic@hcd.ca.gov>  
**To:** "Hing Wong" <Hingw@abag.ca.gov>  
**Date:** 6/11/2012 4:05 PM  
**Subject:** Income Distribution

---

Hi, Hing, Here is the citation I was talking about

Government Code 65584 The regional housing needs allocation plan shall be consistent with all of the following objectives:

...(d)(4) Allocating 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, as compared to the countywide distribution of households in that category from the most recent decennial United States census.

Anda Draghici, Senior Housing Policy Specialist  
Division of Housing Policy Development  
916.327.2640 / F: 916.327.2643

CA Department of Housing and Community Development  
1800 Third Street, Room 430  
Sacramento, CA 95811  
<http://www.hcd.ca.gov/>

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# CITY OF SARATOGA

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COUNCIL MEMBERS:

*Manny Cappello  
Jill Hunter  
Emily Lo  
Howard Miller  
Chuck Page*

Incorporated October 22, 1956

June 05, 2012

Ken Kirkey  
ABAG Planning Director  
101 Eight Street  
Oakland, CA 94607

RE: Comments on the Draft RHNA Methodology

Dear Mr. Kirkey:

Thank you for sending the City of Saratoga the draft Regional Housing Need Allocation (RHNA) Methodology, which we received on May 30, 2012. Based on my review of the proposed methodology, I believe that it does not promote an improved relationship between jobs and housing. I also believe that it would not result in a housing distribution that maximizes the use of public transportation and existing transportation infrastructure.

The projected 60,606 units allocated to Santa Clara County would be very similar to the County's 2007 - 2014 allocation, yet some cities with large employment centers and convenient transit access would be allocated a much smaller number of units in 2014-2022. The draft methodology consequently burdens the smaller and built-out cities that have limited employment and transit opportunities with a much higher housing ratio, up to 1.5 times the 2007 - 2014 allocation.

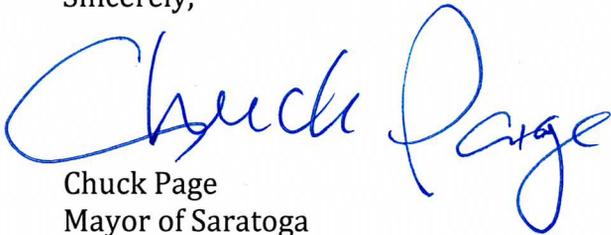
	2014 - 2022 DRAFT RHNA	2007 - 2014 RHNA	Difference (units)
Santa Clara County	60,606	60,338	268
City of Santa Clara	3,812	5,873	(2,061)
Unincorporated	58	1,090	(1,032)
Palo Alto	2,192	2,860	(668)
Los Altos	476	317	159
Saratoga	438	292	146
Los Gatos	616	562	54
Los Altos Hills	122	81	41
Monte Sereno	62	41	21

The use of a minimum housing floor using 40% of household formation growth results in a housing allocation that is clearly inconsistent with the overall objective of Government Code 65584 and Senate Bill 375, to better integrate land-use and transportation planning. Any significant housing growth in smaller bedroom communities that are not supported by employment centers or public transit would increase regional vehicle miles traveled and greenhouse gas emissions.

The draft proposed methodology also penalizes smaller cities that have a lower number of affordable units permitted in the 1999 - 2006 cycle. Cities should be evaluated on the number of affordable units permitted as a percentage of the total units permitted in their jurisdiction. Affordable housing units are being built in smaller built-out cities and those cities should be acknowledged for that effort based on the performance of the local housing market and the total number of permits issued.

I appreciate the opportunity to provide my perspective regarding the proposed methodology. Please include my comments in the feedback provided to the ABAG Executive Board at its July 19, 2012 meeting.

Sincerely,

A handwritten signature in blue ink that reads "Chuck Page". The signature is written in a cursive style with a large, looping initial "C".

Chuck Page  
Mayor of Saratoga

## 1.

### Proposal to Modify OneBayArea Grant Proposal

*This motion is supported by the 6 Wins Network and Greenbelt Alliance*

**Proposed Motion Language:** MTC directs staff to establish now some core requirements for the next cycle of OBAG funding, FY 2015-16. This will set clear expectations for CMAs and jurisdictions so that they can tailor PDA Growth Strategies and other planning and legislative activities toward meeting these requirements. These include:

1. Distributing funding to reward *local* affordable housing production,
2. Requiring local adoption of policies from a flexible, but clearly articulated, menu of housing and community stabilization policies that correspond to those to be studied and considered in the PDA Growth Strategies

**Note:** On two occasions, most recently 4/11/12, MTC/ABAG's own advisory groups (Policy Advisory Council, Equity Working Group) passed a motion supporting changes to OBAG. The 4/11/12 motion was as follows:

*MTC should adopt guidelines for the CMAs and cities for the next OBAG funding cycle (FY 2015-16) that require:*

- *OBAG funding be allocated to the city/jurisdiction level based upon their affordable housing production; and*
- *Cities/jurisdictions have affordable housing and/or anti-displacement policies in place to receive funding. (MTC and ABAG should provide a menu of options and best practice policies for local jurisdictions to choose from.)*

## 2.

### Proposal to Modify the Draft RHNA Methodology

*This motion is supported by the 6 Wins Network and Greenbelt Alliance.*

**Proposed Motion Language:** Every jurisdiction with a median income above the Bay Area average should take-on at least as much of the region's lower-income housing need as it did in the 2007-2014 Planning Period. This would mean shifting some lower-income units from lower-income cities to more affluent cities in exchange for higher-income units. The total RHNA number for each jurisdiction would remain the same.

**Explanation:** The draft RHNA methodology concentrates more housing growth in lower-income cities in the urban core in order to reduce GHG emissions. As a result, some affluent cities that desperately need more affordable housing are seeing sharp declines in their share of the RHNA for low and very-low income units.

With this simple fix, we can achieve both the environmental benefits of focused growth and the equity and economic benefits of planning for enough affordable housing in affluent cities that might not otherwise build it. We can keep the overall focused-growth pattern of the draft RHNA methodology, but also maintain the current, more equitable, distribution of affordable housing in the region.

### 3.

## Proposal to Study Equity Environment and Jobs (EEJ) Scenario

**Proposed Motion Language:** Study the Equity, Environment, and Jobs (EEJ) Scenario as an alternative in the upcoming environmental impact review (EIR) process. If the EEJ Scenario proves to be the environmentally superior alternative, it should be incorporated into the final RTP/SCS.

**Background:** ABAG and MTC members supported inclusion of the Equity Environment and Jobs (EEJ) Scenario in the set of SCS alternatives that were evaluated last summer. While the EEJ Scenario did not end up being included in those alternatives, it can and should be added to the set of alternatives to be studied in the Environmental Impact Review process.

### 4.

## Proposal to Study of an Adequate Baseline of Transit Service

**Motion:** As part of the Preferred Scenario, MTC should study what an adequate baseline of transit service looks like in the Bay Area.

**Background:** This study would analyze what level of service is needed to connect housing, jobs and other essential destinations to achieve Plan Bay Area's Greenhouse Gas emission and driving reduction goals as well as to ensure basic mobility for all Bay Area residents. This study would build off the research in the Transit Sustainability Project (TSP) and provide needed information to complete Plan Bay Area, such that it plans for the optimal level of transit service and addresses issues of overcrowding, and spatial and temporal service gaps.

Currently, no such study has been done and so we have no sense of: 1) what level of transit service we should be planning for and seeking funding for; and 2) how the recent dramatic cuts to transit service have impacted peoples' mobility, the economy, public health or the amount of VMT or Greenhouse Gas emissions. Our research shows that since 2006 more than 600,000 hours (8%) of bus service have been cut resulting in 20 million fewer transit trips per year. (A Title VI analysis of these cuts does not provide us with information about the bigger picture impact we're proposing be studied.)