## Attachment B

## Key Issue/Policy: Housing Redistribution to Suburban Locations

**Issue Area:** Housing advocates, developers, and some stakeholders raised concerns about the concentration of future housing production in core urban areas in the Plan. From one perspective some argue that, the Plan does not provide enough low and moderate income housing in locations with strong job and transit access and high quality amenities including schools. From another, the Plan does not distribute enough housing, including market rate housing to greenfield suburban locations with untapped development potential that can help meet the region's future demand. These questions have led some entities to question the "feasibility" of the Draft Plan.

**Key Considerations:** The distribution of housing in the Draft Plan was adopted in May 2012 by the ABAG Executive Board and the Commission as the Preferred Alternative. This followed extensive consultation with local jurisdictions, stakeholders, and the general public. The Draft Plan's housing distribution identifies the locations that can accommodate future growth, including the scale and type of growth most appropriate for different types of locations. It provides a more focused growth pattern for the region than historic trends, identifies locations for future housing growth while recognizing the unique characteristics of the Bay Area's communities. Relative to the assertion that the Draft Plan's land-use pattern is not feasible, the consultant team responsible for the PDA Readiness Assessment that was developed to evaluate the distribution of future growth in PDAs believe that the Draft Plan's growth allocations represent an achievable, if not easy, outcome consistent with the scope and purpose of a comprehensive regional plan. The team also has stated that in their opinion, it is not at all certain that non-PDA areas are more "ready" for significantly more growth than has been allocated to them under Plan Bay Area.

Shifting the distribution of housing growth in the Plan to more suburban locations would have ripple effects across the region. In addition to increasing the number of housing units distributed to suburban communities without any prior consultation, it would create major distribution changes in other jurisdictions. In the case of shifting low and moderate income housing to job and transit rich suburbs, it would also likely require a dramatic increase in housing subsidies for which no funding source has been identified. Redistributing housing to greenfield suburban locations would likely increase pressure on open space, and create a host of other environmental impacts. Redistributing housing to suburban locations also conflicts with SB 375's requirement to "utilize the most recent planning assumptions considering local general plans and other factors." (Government Code Section 65080(b)(2)(B).)

## **Recommendation:**

1. Retain the housing distribution in the Draft Plan.