



SIERRA CLUB

LOMA PRIETA

SAN MATEO, SANTA CLARA & SAN BENITO COUNTIES

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Subject: General Plan Revisions - Housing Element

The Sustainable Land Use Committee (SLU) of the Sierra Club Loma Prieta Chapter advocates on land use issues in San Mateo and Santa Clara Counties.

Currently, all cities in California are required to update their current Housing Element to meet the new 2023 - 2031 RHNA requirements. This is an impactful process, and we offer the following comments and observations for your consideration.

1. Cities are contributing to an imbalance between jobs and housing that is unsustainable.

We recognize the new RHNA goals are much higher than the previous RHNA goals and most cities are struggling to see how to meet these higher goals; however, as this process is unfolding, many cities are also simultaneously approving large office and R&D developments within their jurisdiction which will bring thousands of new jobs into the community without considering the impact of those jobs on the new RHNA goals and the city's existing jobs/housing balance.

2. Jobs/Housing Fit: Cities are not providing for a sustainable "jobs/housing fit" within their city.

An unsustainable jobs/housing fit means that the majority of homes within the city are not affordable to the majority of employees who work in the city, and conversely, the jobs in the city do not pay enough to cover the cost of housing in the city. This causes difficulty in hiring and retaining employees, higher worker costs, more traffic congestion, more air pollution, less time with family, and less time participating in community recreational activities and events.

3. Many cities are not coordinating plans for new commercial development with their Housing Element.

Cities are not coordinating the expected number of new jobs with the expected number of new housing units that will be needed to house those new employees and the impact those new jobs will have on city-wide housing prices, housing availability, and income inequality.

4. RHNA numbers are not reflecting the anticipated housing need in relation to the real numbers of jobs that each city is approving.

Despite large increases in the RHNA goals, the disconnect is so vast that, even if the city were to fully meet it's 2023-31 RHNA goals, it could still be far short of a sustainable jobs/housing balance.

5. Probability of development: "p(dev)"

While "Probability of Development" for each lot is a required part of a Housing Element, many cities are not considering and documenting the probability ["p(dev)"] that those lots can in-fact be developed.

6. Commercial development proposals should be required to specify anticipated number of jobs created.

If commercial developers do not include an estimate of number of jobs expected in their proposed development, the city staff should

- a) Use a rule of thumb¹ to estimate the number of jobs and the potential impact on the city's overall jobs / housing ratio.
- b) Add this to a running total of the cumulative number of jobs and housing in the city, using a consistently updated excel sheet or equivalent data record in order to track the balance.
- c) Evaluate what impact those jobs will have on the projections in the Housing Element.

7. Sea level rise and wildfires should be a consideration in the Housing Element.

Sea Level Rise and wildfires have increasingly serious financial consequences for taxpayers. The new Housing Element should either not allow or discourage permanent housing in areas highly vulnerable to flooding, potential inundation from ground water rise, and wildfires.

Below we note some ways to maintain a jobs / housing balance.

- a) Require developers of large commercial projects to actually provide the number of housing units needed either on-site or off-site to balance the jobs generated by their development.
- b) This can be in partnership with a for-profit or non-profit housing developer or be built by the commercial developer itself.
- c) Increase current commercial impact fees as they are not sufficient to meet this need.
- d) Require the needed housing to be built simultaneous with building the commercial development.
- e) Change some commercial zoning to residential zoning or mixed-use/housing.

Summary

- **The 2023-31 RHNA goals do not reflect the real anticipated housing needs in many cities based on the real numbers of commercial development and jobs that each city has in its pipeline and is expected to approve during the new RHNA time frame.**
- **The goal of the Housing Element needs to be aligned with the actual number of jobs in the development pipeline, not just the RHNA numbers.**
- **The Housing Element should, in addition, include a “jobs/housing fit” goal, not just numerical jobs:housing balance.**
- **If cities approve zoning changes that are not likely to produce any real new development, those revisions should not count toward the new RHNA goals.**

We recognize that this Housing Element is particularly challenging and are very appreciative of the effort that the city is putting into it. Therefore, we offer this only in the hope that this information may serve to be useful in your process.

Respectfully Yours,



Gita Dev, FAIA, Co-Chair
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Cc: Chair and Members of the San Jose Planning Division
Mayor and Members of the City Council of San Jose
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¹ **Rule of Thumb:** Per our research, a good rule of thumb is a new office building will generate about one job per every 150 square feet of floor space and a new R&D or Biotech campus will generate about one job per 300 to 400 square feet of floor space. These jobs will in turn require a jobs/housing ratio of 1.5 jobs per housing unit or less to maintain a sustainable jobs / housing balance. Note: Calculating the jobs/housing ratio based only on office and R&D square footage covers the housing needed for those new jobs, but does not factor in the multiplier effect where each new office and R&D worker, creates more jobs for the lower income service workers who support that new employee (e.g., grocery clerk, Amazon driver, restaurant worker, etc.). A method of calculating this multiplier effect should also be built into the Housing Element as each office project approved simultaneously creates demand for additional low income and affordable level housing.