



San Benito County Resource Management Agency

Public Works / Planning & Building / Parks / Integrated Waste

Michael Chambless, Interim Director

December 15, 2021

Council of San Benito County Governments (COG), Board of Directors
330 Tres Pinos Rd., C7
Hollister, CA 95023

Subject: 6th Cycle Regional Housing Needs Allocation (RHNA) Methodology

Dear Chair Velazquez and Members of the Board,

In advance of tomorrow's Board meeting, I wanted to share some concerns our agency has about the distribution options presented to the County Board of Supervisors at the meeting held yesterday, December 14, 2021.

The options considered were developed based on the relationship between jobs, housing, and resilience (rebounding from regional hazards). The resulting distribution places an undue burden on the unincorporated county, with required units ranging from 37% to 47% of the total allocation for the region.

These staggering percentages reflect the absence of critical RHNA Factors from the analysis supporting this distribution. The primary factors to be considered in an equitable distribution include infrastructure constraints, preservation of prime farmland, lack of transportation infrastructure and the goal of directing growth toward incorporated areas, and agency population.

Unincorporated San Benito County lacks access to sanitary sewer systems and water supplies that would be essential for any lands to be 'up-zoned' to accommodate the allocation numbers presented. Many areas of the county have depleted and/or contaminated groundwater. In addition, the lack of adequate transportation infrastructure would mean continued gridlock if the county were to accommodate the number of housing units presented. The increase in localized traffic would clearly contribute to increased greenhouse gas emissions, to say nothing of degraded quality of life for county residents.

The unincorporated county also contains many thousands of acres of prime or important agricultural land that is subject to protection from development. The county is also home to dozens of protected plant and animal species and associated habitat.

In short, the three options have not incorporated the most essential factors that differentiate the incorporated cities from the rest of the county. We are a rural agricultural county without the infrastructure necessary to support the kind of growth required under the three options presented to the Board of Supervisors. We urge you to include, or substitute, the missing RHNA Factors we have highlighted in the methodology and provide a more realistic, attainable, and equitable distribution.

Respectfully,

A handwritten signature in blue ink, appearing to read "M. Chambless".

Michael Chambless, Interim Director, Resource Management Agency

cc: Supervisor Bob Tiffany
Supervisor Peter Hernandez