From:	Montoya, Michelle
To:	Buckheit, Lani; Carter, Charles; Cisco, Patti; Crocker, Ashle; Duggan, Vicki; Gallagher, Sue; Hartman, Clare; Holton, Jeffrey; Jones, Jessica; Lyle, Amy; Okrepkie, Jeff; Peterson, Julian; Weeks, Karen; Test, Diane; "dtest@sonic.net"; "jeff.owen@exchangebank.com"; Owen, Jeff; "downey@sonic.net"; Downey, Wayne; "sfb8@sbcglobal.net"; Burke, Stephen; Tom LaPenna; LaPenna, Thomas; McWhorter, Scott; "scott.gsstate@gmail.com"; "yvestiara@gmail.com"; Rawhouser, Yvonne
Cc:	Nicholson, Amy; Basinger, Megan; Brown, Steve
Subject:	Late Correspondence - Item 2.1 - Study Session Draft Housing Element Review
Date:	Tuesday, June 7, 2022 4:09:00 PM
Attachments:	REVISED 6.7.2022 Staff Report .docx REVISED 6.7.2022 - Presentation.pdf ADDED 6.7.2022 - Attachment 2 - Housing Survey Results.pdf Late Correspondence as of 6.7.2022.pdf

---

- PLEASE DO NOT REPLY TO ALL -

Chair Weeks, Chair Test, members of the Planning Commission and Housing Authority,

The reason for this email is to provide you with late correspondence, revised attachments, and new added attachment received for item 2.1, Study Session - Draft 2023-2031 Housing Element Review, scheduled for Thursday's meeting. These will also be added to the agenda as an attachments.
Thank you,

Michelle Montoya | PACE | Administrative Secretary
Planning & Economic Development |100 Santa Rosa Avenue, Room 3 | Santa Rosa, CA 95404
Tel. (707) 543-4645 | mmontoya@srcity.org

permit SONOMA

County of Sonoma
Permit & Resource Management Department

MEMO

DATE: April 18, 2022
TO: Amy Lyle, City of Santa Rosa
FROM: Brian Oh, County of Sonoma
SUBJECT: Transfer of 6th Cycle Regional Housing Needs Allocation

The County proposes a transfer agreement with the City of Santa Rosa to align its 6th Cycle Regional Housing Needs Allocation with a number of county and city policies centered on directing smart growth within city centers and infrastructure.

Government Code Section 65584.07(a) provides that the City and County may enter into a RHNA agreement providing for the transfer to the City of a percent of the County's RHNA obligation for the housing element planning period, and sets forth that if the City and County agree to such a transfer of RHNA responsibility proportionate to the income distribution of the County's allocation, that the transfer will be approved by the Council of Governments.

1. Each of the County's 10 cities have adopted voter-approved Urban Growth Boundaries to direct future growth inside of cities and city UGBs.
2. LAFCO policy generally prohibits the expansion of urban services outside of adopted Urban Growth Boundaries and Spheres of Influence prior to annexation of the subject lands into the City.
3. Most recently affirmed in 2016, Community Separators exist throughout the county.
4. These open spaces, urban growth boundaries and community separators approved by City and County voters benefit all of its residents, but prevent the unincorporated county from developing housing outside of currently designated Spheres of Influence and Urban Growth Boundaries.
5. The city desires to focus its future residential growth within its priority growth areas, namely the Downtown Station Area Specific Plan area where an additional 7,000 units of new housing are planned.
6. City and County both recognize that a joint City-County planning effort must take place in the South Santa Rosa community.
7. In 2020, the Sonoma County Board of Supervisors committed $10 million to the Renewal Enterprise District (RED), a City-County JPA for the furtherance of affordable and workforce housing that will, throughout the 6th cycle planning period, benefit housing projects located within the City of Santa Rosa.

Therefore, the County proposes a transfer of 1,800 units from its current allocation of 3,881 units to the City of Santa Rosa's current allocation of 4,685 units. As part of the County of Sonoma's Housing Element update, staff have analyzed at least nine (9) sites in the South Santa Rosa Area Plan as potential sites for higher-density housing opportunities. The sites have a potential of up to 1,041 units, and both the City of Santa Rosa and the County of Sonoma have a desire for a joint, comprehensive planning effort for the community. The proposed transfer amount shall be distributed across income categories proportionate to the County's original RHNA allocation, as required under Government Code section 66584.07(a).

Sincerely,

Brian Oh

Brian Oh
Digitally signed by Brian Oh
DN: cn=Brian Oh, o, ou, email=brian.oh@sonoma-county.org, c=US
Date: 2022.04.18 09:48:48 -07'00'

Attachment: ABAG RHNA Allocation Report, December 2021

permit SONOMA

County of Sonoma
Permit & Resource Management Department

MEMO

DATE: May 20, 2022
TO: Amy Lyle, City of Santa Rosa
FROM: Brian Oh, County of Sonoma
SUBJECT: Transfer of 6th Cycle Regional Housing Needs Allocation

For its Housing Element update, the County of Sonoma will be building off a decade of smart growth land-use policies such as a 100% density bonus on all eligible unincorporated Sonoma County parcels. Other efforts such as establishing Specific Plans in the Airport Area, the Springs and redevelopment of the Sonoma Developmental Center in Sonoma Valley will be maximizing the county's limited urban lands for potentially 1400 units of additional housing pending Board of Supervisor adoption of the plans later this year. Additionally, the County has identified 59 additional sites being considered for higher density housing that are most appropriate for smart growth development. These sites met the criteria by being located within existing services, within 2000 feet of transit and/or a job center and without environmental and cultural constraints. Furthermore, additional policies currently being explored through the Housing Element update such as incentives for senior and missing middle housing, a 3 for 1 density program, as well as incentives for proposals that include at least 20% of its units as affordable housing, thereby further maximizing the limited unincorporated county lands. Despite maximizing these efforts on limited unincorporated land, the County cannot maintain its commitment to smart growth without establishing partnerships with our Sonoma County jurisdictions.

The County proposes a transfer agreement of 1,800 units with the City of Santa Rosa to align the county's 6th Cycle Regional Housing Needs Allocation with the following county and city policies centered on directing smart growth within city centers and existing infrastructure.

1. Each of the County's 10 cities have adopted voter-approved Urban Growth Boundaries to direct future growth inside of cities and city UGBs.
2. LAFCO policy generally prohibits the expansion of urban services outside of adopted Urban Growth Boundaries and Spheres of Influence prior to annexation of the subject lands into the City.
3. Most recently affirmed in 2016, Community Separators exist throughout the county.
4. These open spaces, urban growth boundaries and community separators approved by City and County voters benefit all of its residents, but prevent the unincorporated county from developing housing outside of currently designated Spheres of Influence and Urban Growth Boundaries.
5. The city desires to focus its future residential growth within its priority growth areas, namely the Downtown Station Area Specific Plan area where an additional 7,000 units of new housing are planned.

6. City and County both recognize that a joint City-County planning effort must take place in the South Santa Rosa community.
7. In 2020, the Sonoma County Board of Supervisors committed $10 million to the Renewal Enterprise District (RED), a City-County JPA for the furtherance of affordable and workforce housing that will, throughout the 6th cycle planning period, benefit housing projects located within the City of Santa Rosa.

Looking ahead, the County commits to a joint effort in ensuring a long-range, equitable plan for the South Santa Rosa community. Such planning will build on other partnerships such as the Renewal Enterprise District and its commitment to bring affordable housing to the county with its initial $10 million commitment to housing in downtown Santa Rosa. Furthermore, County investments of its County Fund for Housing revenues into city projects would require a share of City RHNA credits to the County RHNA as a way to maintain its commitment to smart growth in city centers. The County collects Transient Occupancy Tax, in-lieu & workforce housing fees from unincorporated projects and funds the County Fund for Housing (CFH) to finance development and preservation of affordable housing units countywide. Through regional land-use coordination, Sonoma County can ensure the sustainable and equitable growth of its communities.

Sincerely,

Brian Oh
Permit Sonoma
Comprehensive Planning Manager
Brian.Oh@sonoma-county.org

Attachment: ABAG RHNA Allocation Report, December 2021

Association of Bay Area Governments

© Bruce Damonte courtesy MidPen Housing. All rights reserved.

December
2021

FINAL REGIONAL HOUSING NEEDS ALLOCATION (RHNA) PLAN: San Francisco Bay Area, 2023-2031

CONTENTS

Executive Board Members and Staff 1

Housing Methodology Committee Members 2

Introduction 4

About the Regional Housing Needs Allocation 5

Who is Responsible for RHNA? 5

RHNA Public Engagement and Outreach 6

Schedule and Process for Developing the Regional Housing Needs Allocation 7

The Regional Housing Needs Determination 11

Table 1: ABAG Regional Housing Needs Determination from HCD 11

The Final RHNA Methodology 12

RHNA Statutory Objectives and Factors 12

Final RHNA Methodology Performance Evaluation 14

The Final RHNA Methodology 15

Figure 1: Final Methodology Overview 15

Table 2: Factors and Weights for Final RHNA Methodology 16

Table 3: Allocation Factor Data and Assumptions 17

RHNA Appeals Process 22

The Final RHNA Allocation 24

Table 4: Final RHNA Allocations 24

Figure 2: Final RHNA Allocations, Jurisdiction Growth Rate 30

Figure 3: Final RHNA Allocations, Jurisdiction Total Allocation 31

RHNA Statutory Objectives and Factors 32

RHNA Objectives 32

RHNA Methodology Factors 36

RHNA Subregions 46

Table 5: Final Subregional Shares 46

Next Steps 47

Endnotes 48

Appendices 49

ASSOCIATION OF BAY AREA GOVERMENTS EXECUTIVE BOARD

Jesse Arreguin, President
Mayor, City of Berkeley

Belia Ramos, Vice President
Supervisor, County of Napa

David Rabbitt,
Supervisor, County of Sonoma – Immediate Past President

Susan Adams
Councilmember, City of Rohnert Park

Candace Andersen
Supervisor, County of Contra Costa

Nikki Fortunato Bas
Councilmember, City of Oakland

London Breed
Mayor, City and County of San Francisco

Tom Butt
Mayor, City of Richmond

David Canepa
Supervisor, County of San Mateo

Cindy Chavez
Supervisor, County of Santa Clara

Pat Eklund
Mayor, City of Novato

Maya Esparza
Councilmember, City of San Jose

Carroll Fife
Councilmember, City of Oakland

Neysa Fligor
Mayor, City of Los Altos

Leon Garcia
Mayor, City of American Canyon

Liz Gibbons
Mayor, City of Campbell

Giselle Hale
Vice Mayor, Redwood City

Barbara Halliday
Mayor, City of Hayward

Rich Hillis
Planning Director, City and County of San Francisco

Dave Hudson
Mayor, City of San Ramon

Otto Lee
Supervisor, County of Santa Clara

Matthew Mahan
Councilmember, City of San Jose

Rafael Mandelman
Supervisor, City and County of San Francisco

Gordon Mar
Supervisor, City and County of San Francisco

Nathan Miley
Supervisor, County of Alameda

Karen Mitchoff
Supervisor, County of Contra Costa

Stephanie Moulton-Peters
Supervisor, County of Marin

Raul Peralez
Councilmember, City of San Jose

Carlos Romero
Mayor, East Palo Alto

James Spering
Supervisor, County of Solano

Loren Taylor
Councilmember, City of Oakland

Vacant
City and County of San Francisco (Mayor)

Vacant
County of Alameda

Vacant
County of San Mateo

Lori Wilson
Mayor, City of Suisun City

Jayne Battey
Board Member, San Francisco Bay Regional Water Quality Control Board – Advisory Member

ABAG-MTC STAFF:

Matt Maloney
Section Director, Regional Planning

Dave Vautin
Assistant Director, Major Plans

Gillian Adams
Principal Planner

Eli Kaplan
Regional Housing Policy Analyst

Aksel Olsen
Senior Planner

Leah Zippert
Senior Public Information Officer

Julie Teglovic
Public Information Analyst

Michele Stone
Graphic Design

HOUSING METHODOLOGY COMMITTEE

LOCAL JURISDICTION ELECTED OFFICIALS*

Jesse Arreguín, Chair
Mayor, City of Berkeley, Alameda County

Julie Pierce
Mayor, City of Clayton, Contra Costa County

Pat Eklund
Mayor, City of Novato, Marin County

Diane Dillon
Supervisor, County of Napa

Rick Bonilla
Deputy Mayor, City of San Mateo, San Mateo County

Neysa Fligor
Mayor, City of Los Altos, Santa Clara County

Monica Brown
Supervisor, Solano County

John Vasquez
Supervisor, Solano County (Alternate)

Susan Adams
Councilmember, City of Rohnert Park, Sonoma County

LOCAL JURISDICTION STAFF

Alameda County

Ellen Clark
Planning Manager, City of Pleasanton

Darin Ranelletti
Policy Director for Housing Security, City of Oakland

Contra Costa County

Forrest Ebbs
Community Development Director, City of Antioch

Mindy Gentry
Planning Manager, City of Concord

Andrea Ouse
Community Development Director, City of Concord (Alternate)

Marin County

Elise Semonian
Planning Director, Town of San Anselmo

Ethan Guy
Principal Analyst, City of San Rafael (Alternate)

Napa County

Vin Smith
Community Development Director, City of Napa

San Francisco County

Paolo Ikezoe‡
Senior Planner, City and County of San Francisco

James Pappas‡
Senior Planner, City and County of San Francisco

San Mateo County

Josh Abrams+
Baird + Driskell Community Planning, Staff to 21 Elements

Nell Selander+
Deputy Director, Economic & Community Development, City of South San Francisco

Santa Clara County

Michael Brilliot
Deputy Director for Citywide Planning, City of San Jose

Aarti Shrivastava
Assistant City Manager/Community Development Director, City of Mountain View

Jennifer Carman
Development Services Director, City of Morgan Hill (Alternate)

Andrew Crabtree
Community Development Director, City of Santa Clara (Alternate)

Solano County

Matt Walsh
Principal Planner, Solano County

David Feinstein
Principal Planner, City of Fairfield (Alternate)

Sonoma County

Jane Riley
Comprehensive Planning Manager, Sonoma County

Milan Nevajda
Deputy Planning Director, Sonoma County (Alternate)

Noah Housh
Community Development Director, City of Cotati (Alternate)

REGIONAL STAKEHOLDERS

Social Equity

Victoria Fierce
California Renter Legal Advocacy and Education Fund (CaRLA)

Jeffrey Levin
East Bay Housing Organizations (EBHO)

Fernando Marti
Council of Community Housing Organizations

** The City and County of San Francisco did not appoint an elected official representative*

+ Both served on HMC, Selander replaced Abrams
‡ Both served on HMC, Pappas replaced Ikezoe

Business Community

Russell Hancock
Joint Venture Silicon Valley

Matt Regan
Bay Area Council

Xiomara Cisneros
Bay Area Council (Alternate)

Non-Profit Housing

Welton Jordan
EAH Housing

Rodney K. Nickens, Jr.
Non-Profit Housing Association of Northern California (NPH)

For-Profit Housing

Paul Campos
Building Industry Association of the Bay Area (BIA)

Jonathan Fearn
Greystar Development

Open Space/Agriculture

Amanda Brown-Stevens
Greenbelt Alliance

Public Education

Brandon Kline
San Francisco State University

Public Health

Anita Addison
La Clinica de la Raza

Philanthropy

Rupinder (Ruby) Bolaria Shifrin
Chan Zuckerberg Initative

Public/Alternative Transportation

Bob Planthold
Government and Community Advocates Strategies, Inc.

RPC Housing Subcommittee

Carlos Romero
Urban Ecology

Labor

Scott Littlehale
Northern California Carpenters Regional Council

State Partner

Tawny Macedo
California Department of Housing & Community Development (HCD)

Tom Brinkhuis
HCD (Alternate)

Megan Kirkeby
HCD (Alternate)

© Martin Klimek. All Rights Reserved.

INTRODUCTION

Since 1969, the State of California has required each local government to plan for its share of the state's housing needs for people of all income levels. Through the Regional Housing Needs Allocation (RHNA) process, every local jurisdiction is assigned a number of housing units representing its share of the state's housing needs for an eight-year period. State Housing Element Law requires the Association of Bay Area Governments (ABAG) to develop a methodology for distributing the Bay Area's portion of the state housing needs to local governments within the nine-county region, including reporting on the RHNA methodology. This report contains the data and assumptions involved in developing the final methodology, and it also explains how the final methodology takes into account key statutory factors and meets five key objectives as outlined in Housing Element Law.[1]

ABOUT THE REGIONAL HOUSING NEEDS ALLOCATION

The RHNA process identifies the total number of housing units, separated into four affordability levels, that every local government in the Bay Area must plan to accommodate for the period from 2023 to 2031.[2] The primary role of the RHNA methodology is to encourage a pattern of housing growth for the Bay Area that meets the needs of all residents.

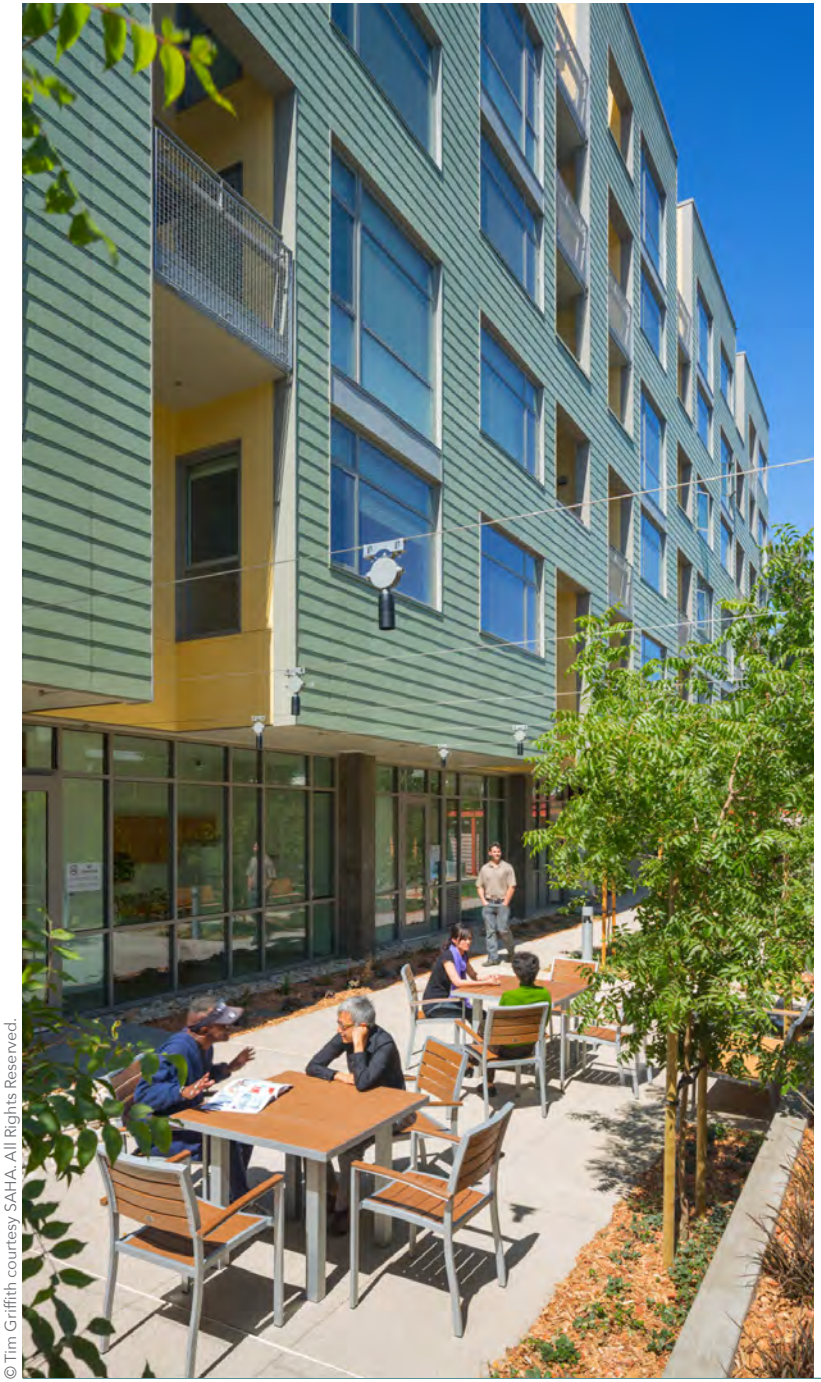
Once it receives its allocation, each local government must update the Housing Element of its General Plan and its zoning to show how it plans to accommodate its RHNA units and meet the housing needs in its community. It is in the community's Housing Element that local governments make decisions about where future housing units could be located and the policies and strategies for addressing specific housing needs within a given jurisdiction, such as addressing homelessness, meeting the needs of specific populations, affirmatively furthering fair housing, or minimizing displacement.[3]

Who is Responsible for RHNA?

Responsibility for completing RHNA is shared among state, regional and local governments:

- The **role of the State** is to identify the total number of homes for which each region in California must plan in order to meet the housing needs of people across the full spectrum of income levels, from housing for

© Martin Klimek. All Rights Reserved.



© Tim Griffith courtesy SAHA. All Rights Reserved.

very low-income households all the way to market-rate housing. This was developed by the California Department of Housing and Community Development (HCD) in 2020 and is known as the Regional Housing Needs Determination (RHND).

- The **role of the region** is to allocate a share of the RHND to each local government in the region. As the Council of Governments (COG) for the nine-county Bay Area, ABAG is required to develop the methodology for sharing the RHND among all cities, towns and counties in the region. During 2019 and 2020, ABAG developed the RHNA methodology in conjunction with a committee of elected officials, city and county staff, and stakeholders called the Housing Methodology Committee (HMC).
- The **role of local governments** is to participate in the development of the allocation methodology and to update their Housing Elements to show how they will accommodate their share of the RHND, following the adoption of the final RHNA allocations. The Housing Element must include an inventory of sites that have been zoned for sufficient capacity to accommodate the jurisdiction's RHNA allocation for each income category.

RHNA Public Engagement and Outreach

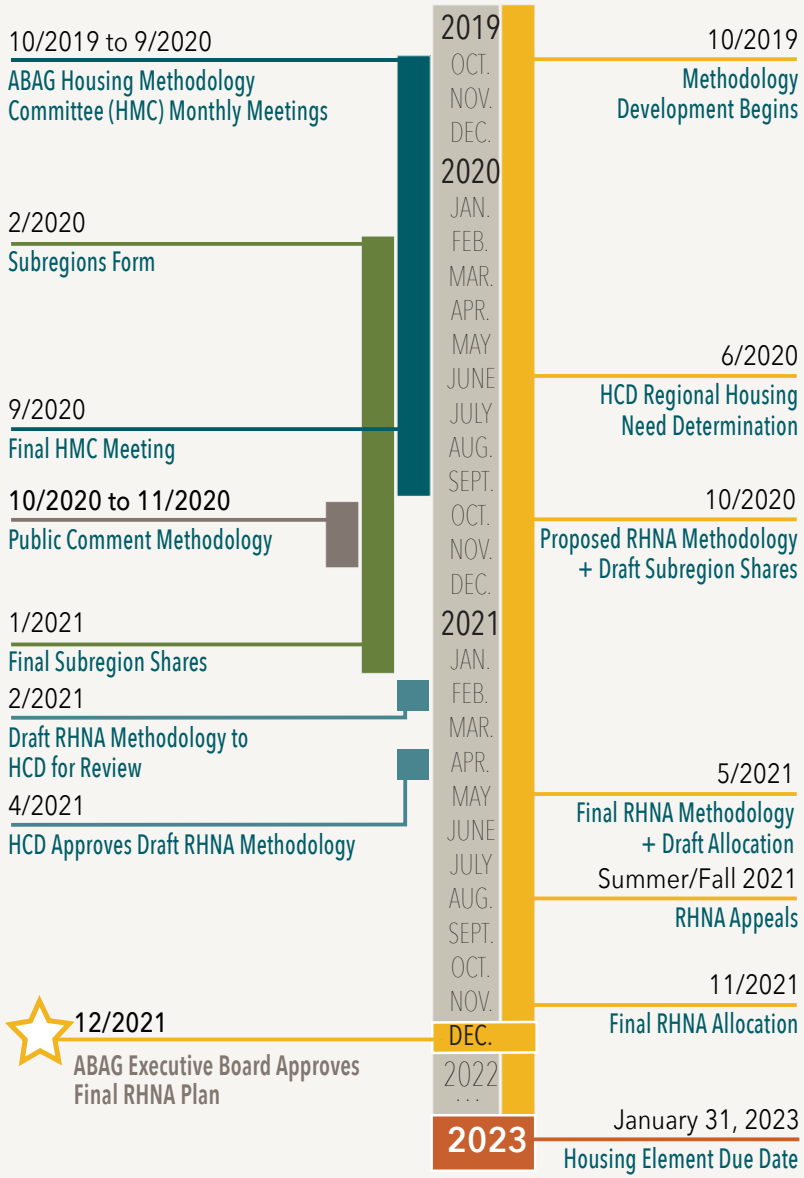
ABAG has employed a variety of strategies to encourage public participation to ensure the perspectives and input of local governments, stakeholders, and members of the public were represented throughout the RHNA development process. ABAG provided opportunities to learn about RHNA and provide input through regular

SCHEDULE AND PROCESS FOR DEVELOPING RHNA

Major Milestones in the RHNA Process

- **October 2019: ABAG convened the Housing Methodology Committee (HMC)**
- **June 9, 2020:** HCD provided ABAG with its determination of total regional housing needs. HCD indicated that Bay Area jurisdictions must plan for 441,176 units between 2023–2031.
- **October 15, 2020:** ABAG Executive Board approved the proposed methodology and draft subregion shares.
- **October 25 – November 27, 2020:** ABAG held a public comment period on the proposed methodology.
- **January 2021:** ABAG Executive Board approved the draft RHNA methodology and final subregional shares.
- **February 11, 2021:** ABAG sent the draft RHNA methodology to HCD for review.
- **April 12, 2021:** HCD sent letter confirming the draft RHNA methodology furthers the RHNA objectives.
- **May 20, 2021:** ABAG Executive Board approved final RHNA methodology and draft RHNA allocations.
- **July 9, 2021:** Deadline for jurisdictions and HCD to appeal a jurisdiction's draft RHNA allocation.
- **September 24 – October 29, 2021:** ABAG Administrative Committee conducted a public hearing to consider appeals.
- **November 12, 2021: ABAG Administrative Committee made final determinations on appeals.**
- **December 16, 2021:** ABAG Executive Board conducted public hearing to adopt final RHNA plan.

2023 – 2031 RHNA Development Timeline



ABAG meetings that were open to the public, outreach to local government elected officials and staff, and electronic news blasts and postings to the ABAG website to notify interested parties at decision points throughout the process. ABAG's outreach and engagement activities are described in more detail below.

ABAG Housing Methodology Committee

As it has for the past several RHNA cycles, ABAG convened a **Housing Methodology Committee** (HMC) to guide development of the methodology used to allocate a share of the region's total housing need to every local government in the Bay Area. The HMC was comprised of local elected officials, jurisdiction staff, and other stakeholders from throughout the Bay Area.

ABAG's HMC approach stands out compared to most other large Councils of Governments, going beyond the legal requirements to facilitate dialogue and information-sharing among local government representatives and stakeholders from across the Bay Area with crucial expertise to address the region's housing challenges. As ABAG strives to advance equity and affirmatively further fair housing, the agency sought to ensure a breadth of voices in the methodology process, and expanded the HMC to include additional members representing social equity, labor, and philanthropy. Additionally, HMC representatives were recruited via increased outreach. The HMC held 12 meetings starting in October 2019 to formulate a recommended RHNA methodology. Information about the topics discussed at the meetings is available on the ABAG website.

© 2012 Clark Mishler courtesy BRIDGE Housing. All Rights Reserved.

ABAG Regional Planning Committee and Executive Board

The ABAG Regional Planning Committee (RPC) received regular updates about the HMC's deliberations and made recommendations about RHNA to the ABAG Executive Board, which took action at key points in the RHNA process. To support the RPC's role as a bridge between the HMC and the Executive Board, the HMC included 12 committee members from the RPC.

Local Government Elected Officials and Staff

In addition to updates provided to the RPC and Executive Board, ABAG conducted outreach to local elected officials and staff using different methods, including:

- Presentations to elected officials through existing meetings, such as Mayors and Councilmembers Conferences and League of California Cities meetings.
- Presentations to existing planning director meetings in each county and development of materials to assist local planning staff in communicating about RHNA to councils and boards.

© Karl Nielsen. All Rights Reserved.

- General Assemblies in **February 2020** and **June 2020** that provided information designed for elected officials about RHNA, Housing Elements, and Plan Bay Area 2050.
- Webinars in **December 2020** and **January 2021** about the Plan Bay Area 2050 Final Blueprint and Draft RHNA Methodology.

Public

All meetings of the HMC, RPC, and Executive Board were open to the public. Representatives of many housing and land use stakeholder groups actively participated in RHNA discussions. The public also had the opportunity to provide input during the public comment period at the meetings described above. Members of the public were also invited to participate in the two webinars ABAG held about the Draft RHNA Methodology.

ABAG also engaged Bay Area residents from traditionally under-represented groups through a series of seven focus groups organized in partnership with community-based organizations throughout the region. In January and February 2020 focus groups were held with Acterra, Community Resources for Independent Living, Green Hive, Sacred Heart Community Service, Sound of Hope Radio Network, and West Oakland Environmental Indicators Project. Focus group participants were asked questions about regional housing issues in an interactive setting and encouraged to discuss thoughts freely with other participants. A summary of participants' comments was shared with the HMC and RPC to inform development of the RHNA methodology.

Public Comment Period and Developing the Final Methodology

The ABAG Executive Board approved release of the proposed RHNA methodology for public comment on October 15, 2020. As required by law, ABAG held a public comment period from October 25 to November 27 and conducted a public hearing at the November 12 meeting of the ABAG Regional Planning Committee. The **comments received** provided perspectives from over 200 local government staff and elected officials, advocacy organizations, and members of the public.

In response to feedback received during the public comment period, the RPC and Executive Board voted to incorporate the "equity adjustment" as part of the draft RHNA methodology approved in January 2021. As required by law, ABAG submitted the draft RHNA methodology to HCD for its review on February 11, 2021. On April 12, 2021, HCD sent ABAG a letter confirming the draft RHNA methodology furthers the RHNA objectives (see Appendix 1 for the letter ABAG received from HCD). The Executive Board approved the final RHNA methodology and draft allocations (shown in Appendix 7) at its meeting on May 20, 2021.

The Regional Housing Needs Determination[4]

In consultation with ABAG, HCD determined that the Bay Area must plan for 441,176 new housing units from 2023 to 2031. This determination is based on population projections produced by the California Department of Finance (see **Appendix 2** for the letter ABAG received from HCD). Details of the RHND by income category are shown in **Table 1**. This determination is based on population projections produced by the California Department of Finance and the application of specific adjustments to determine the total amount of housing needs for the region. The adjustments are a result of recent legislation that sought to incorporate an estimate of existing housing need by requiring HCD to apply factors related to a target vacancy rate, the rate of overcrowding, and the share of cost-burdened households.[5] The new laws governing the methodology for how HCD calculates the RHND resulted in a significantly higher number of housing units for which the Bay Area must plan compared to previous RHNA cycles.

Table 1: **ABAG Regional Housing Needs Determination from HCD**

INCOME CATEGORY	PERCENT	HOUSING UNIT NEED
Very Low*	**25.9%**	**114,442**
Low	**14.9%**	**65,892**
Moderate	**16.5%**	**72,712**
Above Moderate	**42.6%**	**188,130**
TOTAL	100%	441,176

** Extremely Low* — *15.5%* — *Included in "Very Low" Income Category*

© Bernard Andre. All Rights Reserved.

THE FINAL RHNA METHODOLOGY

As noted previously, the purpose of the RHNA methodology is to divide the RHND among Bay Area jurisdictions. The methodology is a formula that calculates the number of housing units assigned to each city and county, and the formula also distributes each jurisdiction's housing unit allocation among four affordability levels.

RHNA Statutory Objectives and Factors

Development of the RHNA methodology was guided by the statutory requirements that the RHNA meet five objectives[6] and be consistent with the forecasted development pattern from Plan Bay Area 2050.[7] The five statutory objectives of RHNA can be summarized as:

Objective 1: Increase housing supply and mix of housing types, tenure and affordability in all cities and counties in an equitable manner.

Objective 2: Promote infill development and socio-economic equity, protect environmental and agricultural resources, encourage efficient development patterns and achieve greenhouse gas emissions reduction targets.

Objective 3: Promote improved intraregional jobs-housing relationship, including balance between low-wage jobs and affordable housing.

Objective 4: Balance disproportionate household income distributions (more high-income RHNA to lower-income areas and vice-versa).

Objective 5: Affirmatively further fair housing.

Since the last RHNA cycle (2015 to 2023), the State has made several changes to the laws that govern the RHNA process, including modifications to the objectives that the RHNA allocation must meet. Changes include highlighting the importance of specifically addressing the balance between low-wage jobs and homes affordable to low-wage workers (known as jobs-housing fit) when looking at improving the jobs-housing relationship as part of Objective 3 as well as considering achievement of the region's greenhouse gas emissions reduction target when promoting infill development and socioeconomic equity as part of Objective 2. However, the most notable addition is Objective 5, the new requirement to "affirmatively further fair housing," which focuses on overcoming patterns of segregation and fostering inclusive communities.[8] This new requirement applies to RHNA as well as local government Housing Element updates. While RHNA has always focused on increasing access to housing for all, the new statutory requirements make this commitment to fair housing a more explicit aspect of the RHNA process and Housing Element updates.

In addition to meeting the objectives outlined above, State Housing Element Law requires ABAG to consider a specific set of factors in the development of the RHNA methodology. The law also requires ABAG to survey its member jurisdictions to gather information on the factors that must be considered for inclusion in the methodology.[9] As part of the new requirement related to affirmatively furthering fair housing, ABAG included questions in the survey about local governments' issues, strategies and actions related to achieving fair housing goals.

As a complement to these survey questions, ABAG staff also reviewed the fair housing reports that jurisdictions submit to the federal government if they receive block grant funding from the U.S. Department of Housing and Urban Development. ABAG opened an online survey to all jurisdictions in the region from January-February 2020 and received 72 responses, a response rate of 66 percent.[10] ABAG staff reviewed the survey responses as well as other relevant data to inform the development of a methodology that achieves the objectives outlined in state statute.

Housing Element Law also identifies several criteria that cannot be used as the basis for a determination of a jurisdiction's share of the regional housing need. These include:

1. Any ordinance, policy, voter-approved measure or standard of a city or county that directly or indirectly limits the number of residential building permits issued by a city or county.
2. Prior underproduction of housing in a city or county from the previous regional housing need allocation.
3. Stable population numbers in a city or county from the previous regional housing needs cycle.

More information about how the final RHNA methodology furthers the objectives and addresses the methodology factors in Housing Element Law is provided in the RHNA Statutory Objectives and Factors section.

Michele Stone, MTC

Final RHNA Methodology Performance Evaluation

As noted previously, Housing Element Law requires that the RHNA methodology meet five statutory objectives and that it be consistent with the forecasted development pattern from Plan Bay Area 2050. In January 2021, the Plan Bay Area 2050 Final Blueprint was approved by the ABAG Executive Board and Metropolitan Transportation Commission (MTC) as the Preferred Alternative for the Environmental Impact Report.

© Bruce Damonte courtesy MidPen Housing. All Rights Reserved.

Working with the HMC, ABAG-MTC staff developed a set of performance evaluation metrics that provide feedback about how well methodology options addressed the five statutory objectives for RHNA and furthered regional planning goals. Each metric corresponds to one of the five RHNA statutory objectives and the metrics selected were primarily based on the analysis conducted by HCD in evaluating the RHNA methodologies completed by other regions in California.[11] **Appendix 3** describes the evaluation metrics in more detail and demonstrates that the final RHNA methodology performs well in advancing the five statutory objectives of RHNA.

ABAG-MTC staff also developed a framework for evaluating consistency between RHNA and Plan Bay Area 2050. This approach compares the 8-year RHNA allocations to the 35-year housing growth from the Plan Bay Area 2050 Final Blueprint at the county and sub-county geographies used in the plan. If the 8-year growth level from RHNA does not exceed the 35-year housing growth level at either of these geographic levels, then RHNA and Plan Bay Area 2050 will be determined to be consistent. Staff evaluated the final RHNA methodology using this approach and determined that the RHNA allocation is consistent with Plan Bay Area.[12]

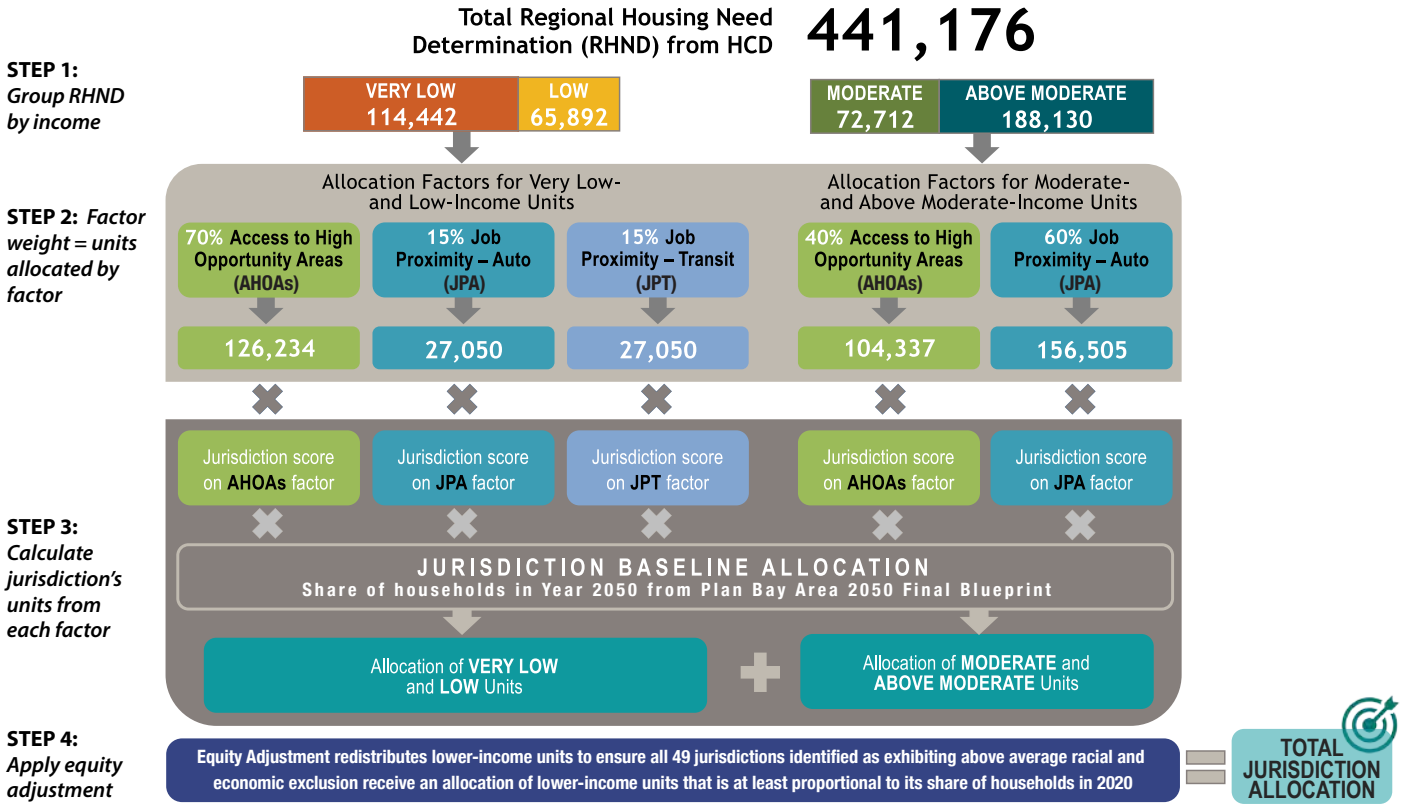
The Final RHNA Methodology

Figure 1 (below) provides an overview of the final RHNA methodology, which includes three primary components: the baseline allocation, factors and weights, and the equity adjustment.

1. Baseline allocation: 2050 Households (Final Blueprint)

The baseline allocation is used to assign each jurisdiction a beginning share of the RHND. The baseline allocation is based on each jurisdiction's share of the region's total households in the year 2050 from the Plan Bay Area 2050 Final Blueprint.[13] Using the 2050 Households (Final Blueprint) baseline takes into consideration the number of households that are currently living in a jurisdiction as well as the number of households expected to be added over the next several decades. The HMC preferred using 2050 Households as the baseline because it provides a middle ground between using a baseline based on the current number of households and a baseline based on forecasted housing growth from the Plan Bay Area 2050 Final Blueprint.

Figure 1: **Final Methodology Overview**



2. Factors and weights for allocating units by income category

Table 2 below shows the factors and weights selected for the RHNA methodology. The methodology includes one set of factors and weights for allocating very low- and low-income units and a second set of factors and weights for allocating moderate- and above-moderate units. The number of units allocated to each jurisdiction using these two formulas are added together to determine that jurisdiction's total allocation.

Table 2: **Factors & Weights for Final RHNA Methodology**

VERY LOW AND LOW UNITS		MODERATE AND ABOVE MODERATE UNITS	
70%	Access to High Opportunity Areas	40%	Access to High Opportunity Areas
15%	Job Proximity – Auto	60%	Job Proximity – Auto
15%	Job Proximity – Transit		

The weight assigned to each factor (i.e., the percentages shown in Table 2) represents the factor's relative importance in the overall allocation. The weight determines the share of the region's housing needs that will be assigned by that particular factor.

Each factor represents data related to the methodology's policy priorities: access to high opportunity areas and proximity to jobs. Determining a factor's impact starts with calculating the jurisdiction's raw score for a factor. For Access to High Opportunity Areas, the raw score is the share of households in a jurisdiction in High or Highest Resource census tracts. The raw score for job proximity is the share of the region's jobs that can be accessed from a jurisdiction in either a 30-minute auto or 45-minute transit commute. Table 3 (pages 17-18) provides more detail about the data and assumptions for each factor.

A factor's effect on a jurisdiction's allocation depends on how the jurisdiction scores on the factor relative to

© Noah Berger. All Rights Reserved.

Table 3: **Allocation Factor Data and Assumptions**

ACCESS TO HIGH OPPORTUNITY AREAS	
Overview	The Access to High Opportunity Areas factor received the most consistent support from the HMC throughout the methodology development process. This factor allocates more housing units to jurisdictions with a higher percentage of households living in areas labelled High Resource or Highest Resource on the 2020 Opportunity Map produced by HCD and the California Tax Credit Allocation Committee (TCAC).[14] The Opportunity Map stems from HCD's policy goals to avoid further segregation and concentration of poverty and to encourage access to opportunity through affordable housing programs. The map uses publicly available data sources to identify areas in the state whose characteristics have been shown by research to support positive economic, educational, and health outcomes for low-income families and their children. The Access to High Opportunity Areas factor directly addresses the RHNA objective to affirmatively further fair housing by increasing access to opportunity and replacing segregated living patterns.[15] Although this factor does not explicitly incorporate racial demographics, it has the potential to expand housing opportunities for low-income households and people of color in more places where these communities have historically lacked access. Another practical strength of this factor is that HCD has consistently used the Opportunity Map to assess whether other regions' RHNA methodologies meet the objective to affirmatively further fair housing.
Impact	More housing units allocated to jurisdictions with the most access to opportunity.
Definition	The percentage of a jurisdiction's households living in census tracts labelled High Resource or Highest Resource based on opportunity index scores.
Data Source	HCD/TCAC 2020 Opportunity Maps Note: The original Opportunity Map methodology required that 40 percent of tracts designated as rural within each county are labelled as High or Highest Resource. However, all non-rural tracts in a region are compared to each other, not just to other tracts in the same county, and the tracts with opportunity index scores in the top 40 percent among all non-rural tracts are labelled High or Highest Resource. Staff from UC Berkeley's Othering and Belonging Institute, who prepared the opportunity index data for TCAC and HCD, issued a recalculation of the opportunity index to ABAG/MTC staff for use in the RHNA methodology. In the recalculation, all Bay Area census tracts are compared to each other, so rural areas are now compared to all other tracts in the region instead of solely to other rural tracts in the same county. This recalculation mostly affected Solano and Sonoma Counties, which had fewer tracts classified as High or Highest Resource as a result.

Table 3 continued on next page

Table 3: **Allocation Factor Data and Assumptions** (continued)

JOB PROXIMITY	
Overview	The two factors based on job proximity (Job Proximity – Auto and Job Proximity – Transit) consider the relationship between jobs and transportation. Job Proximity – Auto is based on jobs that can be accessed from a jurisdiction by a 30-minute auto commute, while Job Proximity – Transit is based on jobs that can be accessed from a jurisdiction within a 45-minute transit commute. These factors encourage more housing in jurisdictions with easier access to the region's job centers. Additionally, these factors use a commute shed to measure job access rather than solely considering the jobs present within a jurisdiction's boundaries. Using a commute shed intends to better capture the lived experience of accessing jobs irrespective of jurisdiction boundaries. Housing and job markets extend beyond jurisdiction boundaries—in most cities, a majority of workers work outside their jurisdiction of residence, and demand for housing in a particular jurisdiction is substantially influenced by its proximity and accessibility to jobs in another community.
Impact	More housing allocated to jurisdictions with easier access to region's job centers.
Definition	• **Job Proximity – Auto:** Share of region's total jobs that can be accessed from a jurisdiction by a 30-minute auto commute during the morning peak period. Assumes single-occupant vehicle drivers who decline the use of Express Lanes. • **Job Proximity – Transit:** Share of region's total jobs that can be accessed from a jurisdiction by a 45-minute transit commute during the morning peak period. Assumes transit users can choose from all modes available to them to get between home and work.
Data Source	MTC, Travel Model One, Model Run 2015_06_002 (Source: Plan Bay Area 2040, 2017)

other jurisdictions in the region. A jurisdiction with an above-average score on a factor would get an upwards adjustment, whereas a city with a below-average score on a factor would get a downwards adjustment relative to the baseline allocation.

By design, the factors are placed on the same scale so a factor can modify the baseline in the range from 50 percent to 150 percent: Jurisdictions scoring at the top for the region will get baseline share times 1.5, while jurisdictions scoring at the bottom for the region will get baseline share times 0.5. This scaling approach helps distribute RHNA units throughout the region by ensuring that even a jurisdiction with a low score gets an allocation from each factor and placing a limit on how many units

© Bruce Damonte courtesy CHP All rights reserved.

can be assigned to a jurisdiction with a high score. A jurisdiction that receives a low score on a factor will have few units allocated based on that factor compared to other jurisdictions in the region.

Appendix 4 shows the impact that each factor has on each jurisdiction's baseline allocation from the Plan Bay Area 2050 Final Blueprint. As noted previously, a jurisdiction's raw factor score is rescaled to a range of 0.5 to 1.5. Each jurisdiction's baseline allocation is then multiplied by its scaled factor score. The final step is to adjust the scaled factor scores for all jurisdictions to ensure they sum to 100 percent (see the column "Factor Distribution: Adjusted Baseline Rescaled to 100%"). This re-scaling step is necessary to ensure the methodology allocates the exact number of housing units in each income category that was assigned by HCD in the RHND.

Appendix 5 shows the number of units, by income category, that each jurisdiction receives as a result of each factor in the methodology. This table also shows the impact of the equity adjustment (described in more detail below) on the very low- and low-income allocations for every jurisdiction.

3. Equity Adjustment

The equity adjustment identifies 49 jurisdictions that exhibit racial and socioeconomic demographics that differ from the regional average using a composite score developed by several members of the HMC. The purpose of the equity adjustment is to ensure that each of these 49 jurisdictions receives an allocation of lower-income units that is at least proportional to its share of the region's total households in 2020. For example, if a jurisdiction had two

percent of existing households, it would receive at least two percent of the very low- and low-income RHNA units.

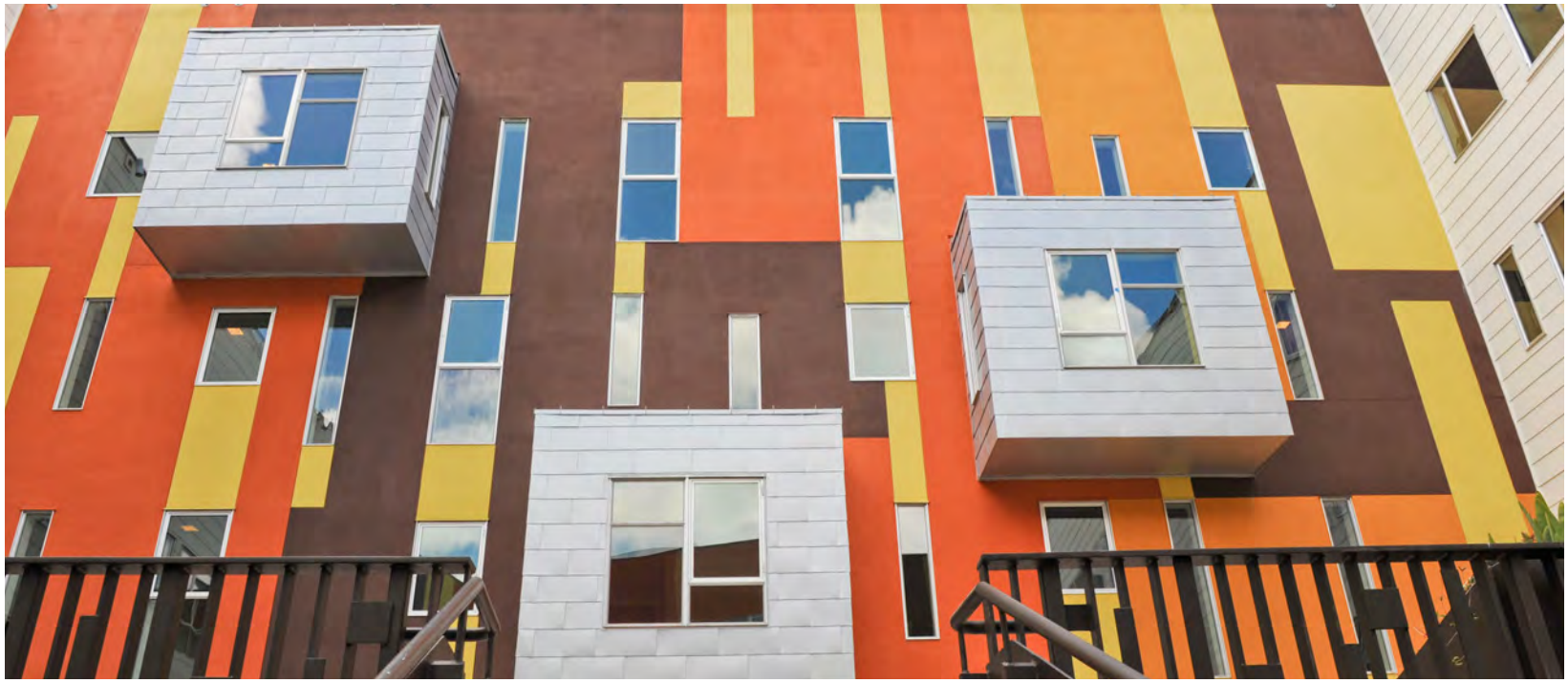
The composite score is calculated by adding together the jurisdiction's divergence index score[16] (which measures segregation by looking at how much local racial demographics differ from the region) and the percent of the jurisdiction's households with household incomes above 120 percent of the area median income (AMI). Jurisdictions with a composite score greater than the median score for the region are included in the group of "exclusionary" jurisdictions. Accordingly, a jurisdiction does not necessarily need to have an extremely high divergence score or percent of households above 120 percent AMI to be considered "exclusionary," as a jurisdiction's composite score only needs to be in the top half for all Bay Area jurisdictions.

The equity adjustment excludes five jurisdictions who have composite scores above the region's median, but median incomes in the bottom quartile for the region. These jurisdictions were excluded from the equity adjustment to avoid directing additional lower-income RHNA units to jurisdictions with racial demographics that are different than the rest of the region but that already have a high share of lower-income households.

© Karl Nielsen. All Rights Reserved.

The equity adjustment is the last step in the allocation methodology, and is applied after the methodology's factors and weights are used to determine a jurisdiction's allocation by income category. If the allocation of lower-income RHNA units to one of the 49 jurisdictions identified by the equity adjustment's composite score does not meet the equity adjustment's proportionality threshold, then lower-income units are redistributed from the remaining 60 jurisdictions in the region to increase that jurisdiction's lower-income allocation until it is proportional. Each jurisdiction in this group has its allocation of lower-income units reduced in proportion to its share of the total lower-income units among the jurisdictions in the group of 60. The equity adjustment does not have any effect on moderate- and above moderate-income units.

Appendix 6 shows the calculations for the composite score used to identify the 49 jurisdictions that exhibit racial and socioeconomic demographics that differ from the regional average. It also shows the effects of the equity adjustment on each jurisdiction's allocation of lower-income units. Of the 49 jurisdictions, 31 receive allocations that meet the equity adjustment's proportionality threshold based on the methodology's factors and weights that emphasize access to high opportunity areas. The allocations for these 31 jurisdictions do not change as a result of the equity adjustment. The other 60 jurisdictions in the region see reductions in their lower-income allocations (and thus their total allocations) as units are shifted to the 18 jurisdictions whose allocations are increased as a result of the equity adjustment.



© Julio Cesar courtesy BRIDGE Housing. All Rights Reserved.

RHNA APPEALS PROCESS

Government Code Section 65584.05 identifies a limited and narrow set of circumstances where a jurisdiction can appeal a draft RHNA allocation. On May 20, 2021, following approval of the final RHNA methodology and draft allocations, the ABAG Executive Board approved the *ABAG 2023-2031 RHNA Appeals Procedures*. The Executive Board also delegated authority to the ABAG Administrative Committee to conduct the required public hearing for considering RHNA appeals and to make the final determinations on the appeals.

The Appeals Procedures provide an overview of the statutory procedures and bases for an appeal and outline ABAG's policies for conducting the public hearing. This document and other materials related to the appeals process are on the ABAG website at **https://abag.ca.gov/our-work/housing/rhna-regional-housing-needs-allocation/2023-2031-rhna-appeals-process**.

On May 25, 2021, ABAG notified each local jurisdiction, HCD, and members of the public about adoption of the draft RHNA allocations and initiation of the appeals period. The email to jurisdictions included a link to the *ABAG 2023-2031 RHNA Appeals Procedures*.

Appeals Submitted by Local Jurisdictions

ABAG received appeals from 27 Bay Area jurisdictions (with one jurisdiction submitting two separate appeals) during the 45-day appeals period from May 25, 2021 to July 9, 2021. On July 16, 2021, ABAG posted all appeal materials received from local jurisdictions on its website and distributed them to each local jurisdiction, HCD and members of the public consistent with Government Code Section 65584.05(c).

© Noah Berger. All Rights Reserved.

Public Comments on Appeals

During the public comment period from July 16, 2021 to August 30, 2021, ABAG received nearly 450 comments from local jurisdictions, HCD, regional stakeholders, and members of the public on the 28 appeals submitted. On September 1, 2021, ABAG posted all comments received during the comment period on its website.

Notice of Appeals Public Hearing

Also on September 1, 2021, ABAG distributed the public comments and the public hearing schedule to each local jurisdiction, HCD and members of the public. This ensured

that each jurisdiction that submitted an appeal received notice of the public hearing schedule at least 21 days in advance, consistent with Government Code Section 65584.05(d). Between August 29 and September 3, 2021, legal notices announcing the public hearing schedule were posted on the ABAG website and published in multiple languages in newspapers in all nine Bay Area counties.

Appeals Public Hearing at ABAG Administrative Committee

The ABAG Administrative Committee conducted the public hearing to consider the RHNA appeals. Each jurisdiction's appeal was considered at one of six meetings on the following dates:

- September 24, 2021
- September 29, 2021
- October 8, 2021
- October 15, 2021
- October 22, 2021
- October 29, 2021.

The jurisdiction, HCD, other local jurisdictions and the public could submit comments related to the appeal. Per ABAG's adopted appeals procedures, during the hearing, the jurisdiction that submitted the appeal could present the bases for the appeal and information to support the arguments to the committee. The jurisdiction's presentation was followed by a response from ABAG-MTC staff, consistent with the information provided in the written staff report. Then, the applicant could respond to the arguments or evidence that ABAG-MTC staff presented. After these presentations, members of the public could provide comments prior to discussion by the Administrative Committee. Committee members considered all documents submitted and all public comments prior to taking a preliminary vote on the jurisdiction's appeal.

Final Determinations on Appeals

The ABAG Administrative Committee met on November 12, 2021, to take final action to ratify the preliminary decisions it made on each appeal during the public hearing. Documents related to the final determination for all appeals is available on the **ABAG website**.

The ABAG Administrative Committee denied all appeals submitted by local jurisdictions, with the exception of the appeal submitted by the County of Contra Costa. The Administrative Committee partially granted the County's appeal because an area annexed to Pittsburg in 2018 (LAFCO 17-08) was incorrectly included as part of unincorporated Contra Costa County in the Plan Bay Area 2050 Final Blueprint. Reducing the County's total households in 2050 (the baseline allocation for RHNA methodology) by the 412 households that the Final Blueprint forecasted in that area results in a reduction in the County's total RHNA of 35 units. As allowed by Government Code Section 65584.05(e)(1), the Administrative Committee determined that these 35 RHNA units should be transferred to the City of Pittsburg. This transfer of units is reflected in the final RHNA allocations issued by ABAG on November 19, 2021.

THE FINAL RHNA ALLOCATION

The ABAG Executive Board adopted the final RHNA allocations on December 16, 2021. The final allocations reflect the ABAG Administrative Committee's decision to partially grant the appeal filed by the County of Contra Costa, which affected the final allocations for the County and the City of Pittsburg.

Table 4: **Final RHNA Allocations**

Jurisdiction	VERY LOW INCOME (<50% of Area Median Income)	LOW INCOME (50-80% of Area Median Income)	MODERATE INCOME (80-120% of Area Median Income)	ABOVE MODERATE INCOME (>120% of Area Median Income)	TOTAL
ALAMEDA COUNTY					
Alameda	1,421	818	868	2,246	5,353
Albany	308	178	175	453	1,114
Berkeley	2,446	1,408	1,416	3,664	8,934
Dublin	1,085	625	560	1,449	3,719
Emeryville	451	259	308	797	1,815
Fremont	3,640	2,096	1,996	5,165	12,897
Hayward	1,075	617	817	2,115	4,624
Livermore	1,317	758	696	1,799	4,570
Newark	464	268	318	824	1,874
Oakland	6,511	3,750	4,457	11,533	26,251
Piedmont	163	94	92	238	587
Pleasanton	1,750	1,008	894	2,313	5,965
San Leandro	862	495	696	1,802	3,855
Unincorporated Alameda County	1,251	721	763	1,976	4,711
Union City	862	496	382	988	2,728

Jurisdiction	VERY LOW INCOME (<50% of Area Median Income)	LOW INCOME (50-80% of Area Median Income)	MODERATE INCOME (80-120% of Area Median Income)	ABOVE MODERATE INCOME (>120% of Area Median Income)	TOTAL
CONTRA COSTA COUNTY					
Antioch	792	456	493	1,275	3,016
Brentwood	402	232	247	641	1,522
Clayton	170	97	84	219	570
Concord	1,292	744	847	2,190	5,073
Danville	652	376	338	875	2,241
El Cerrito	334	192	241	624	1,391
Hercules	344	198	126	327	995
Lafayette	599	344	326	845	2,114
Martinez	350	201	221	573	1,345
Moraga	318	183	172	445	1,118
Oakley	279	161	172	446	1,058
Orinda	372	215	215	557	1,359
Pinole	121	69	87	223	500
Pittsburg	516	296	346	894	2,052
Pleasant Hill	566	326	254	657	1,803
Richmond	840	485	638	1,651	3,614
San Pablo	173	100	132	341	746
San Ramon	1,497	862	767	1,985	5,111
Unincorporated Contra Costa	2,072	1,194	1,211	3,133	7,610
Walnut Creek	1,657	954	890	2,304	5,805

Jurisdiction	VERY LOW INCOME (<50% of Area Median Income)	LOW INCOME (50-80% of Area Median Income)	MODERATE INCOME (80-120% of Area Median Income)	ABOVE MODERATE INCOME (>120% of Area Median Income)	TOTAL
MARIN COUNTY					
Belvedere	49	28	23	60	160
Corte Madera	213	123	108	281	725
Fairfax	149	86	71	184	490
Larkspur	291	168	145	375	979
Mill Valley	262	151	126	326	865
Novato	570	328	332	860	2,090
Ross	34	20	16	41	111
San Anselmo	253	145	121	314	833
San Rafael	857	492	521	1,350	3,220
Sausalito	200	115	114	295	724
Tiburon	193	110	93	243	639
Unincorporated Marin	1,100	634	512	1,323	3,569
NAPA COUNTY					
American Canyon	112	65	75	194	446
Calistoga	31	19	19	50	119
Napa	504	291	319	825	1,939
St. Helena	103	59	26	66	254
Unincorporated Napa	369	213	120	312	1,014
Yountville	19	11	12	30	72
SAN FRANCISCO COUNTY					
San Francisco (city)	20,867	12,014	13,717	35,471	82,069

Jurisdiction	VERY LOW INCOME (<50% of Area Median Income)	LOW INCOME (50-80% of Area Median Income)	MODERATE INCOME (80-120% of Area Median Income)	ABOVE MODERATE INCOME (>120% of Area Median Income)	TOTAL
SAN MATEO COUNTY					
Atherton	94	54	56	144	348
Belmont	488	281	283	733	1,785
Brisbane	317	183	303	785	1,588
Burlingame	863	497	529	1,368	3,257
Colma	44	25	37	96	202
Daly City	1,336	769	762	1,971	4,838
East Palo Alto	165	95	159	410	829
Foster City	520	299	300	777	1,896
Half Moon Bay	181	104	54	141	480
Hillsborough	155	89	87	223	554
Menlo Park	740	426	496	1,284	2,946
Millbrae	575	331	361	932	2,199
Pacifica	538	310	291	753	1,892
Portola Valley	73	42	39	99	253
Redwood City	1,115	643	789	2,041	4,588
San Bruno	704	405	573	1,483	3,165
San Carlos	739	425	438	1,133	2,735
San Mateo	1,777	1,023	1,175	3,040	7,015
South San Francisco	871	502	720	1,863	3,956
Unincorporated San Mateo	811	468	433	1,121	2,833
Woodside	90	52	52	134	328

Jurisdiction	VERY LOW INCOME (<50% of Area Median Income)	LOW INCOME (50-80% of Area Median Income)	MODERATE INCOME (80-120% of Area Median Income)	ABOVE MODERATE INCOME (>120% of Area Median Income)	TOTAL
SANTA CLARA COUNTY					
Campbell	752	434	499	1,292	2,977
Cupertino	1,193	687	755	1,953	4,588
Gilroy	669	385	200	519	1,773
Los Altos	501	288	326	843	1,958
Los Altos Hills	125	72	82	210	489
Los Gatos	537	310	320	826	1,993
Milpitas	1,685	970	1,131	2,927	6,713
Monte Sereno	53	30	31	79	193
Morgan Hill	262	151	174	450	1,037
Mountain View	2,773	1,597	1,885	4,880	11,135
Palo Alto	1,556	896	1,013	2,621	6,086
San Jose	15,088	8,687	10,711	27,714	62,200
Santa Clara	2,872	1,653	1,981	5,126	11,632
Saratoga	454	261	278	719	1,712
Sunnyvale	2,968	1,709	2,032	5,257	11,966
Unincorporated Santa Clara	828	477	508	1,312	3,125

Jurisdiction	VERY LOW INCOME (<50% of Area Median Income)	LOW INCOME (50-80% of Area Median Income)	MODERATE INCOME (80-120% of Area Median Income)	ABOVE MODERATE INCOME (>120% of Area Median Income)	TOTAL
SOLANO COUNTY					
Jurisdictions in Solano County formed a subregion to complete a separate RHNA process on behalf of all jurisdictions in the county. The Solano Subregion adopted its final RHNA allocations on November 18, 2021. For more information see https://www.solanocounty.com/depts/rm/planning/regional_housing_needs_allocation_and_housing_element.asp					
Solano Subregion	2,803	1,612	1,832	4,745	10,992
SONOMA COUNTY					
Cloverdale	74	43	45	116	278
Cotati	60	34	39	101	234
Healdsburg	190	109	49	128	476
Petaluma	499	288	313	810	1,910
Rohnert Park	399	230	265	686	1,580
Santa Rosa	1,218	701	771	1,995	4,685
Sebastopol	55	31	35	92	213
Sonoma	83	48	50	130	311
Unincorporated Sonoma	1,036	596	627	1,622	3,881
Windsor	385	222	108	279	994
TOTAL	**114,442**	**65,892**	**72,712**	**188,130**	**441,176**

Figure 2: Final RHNA Allocations

Jurisdiction growth rate from 2020 households as a result of 2023-2031 RHNA

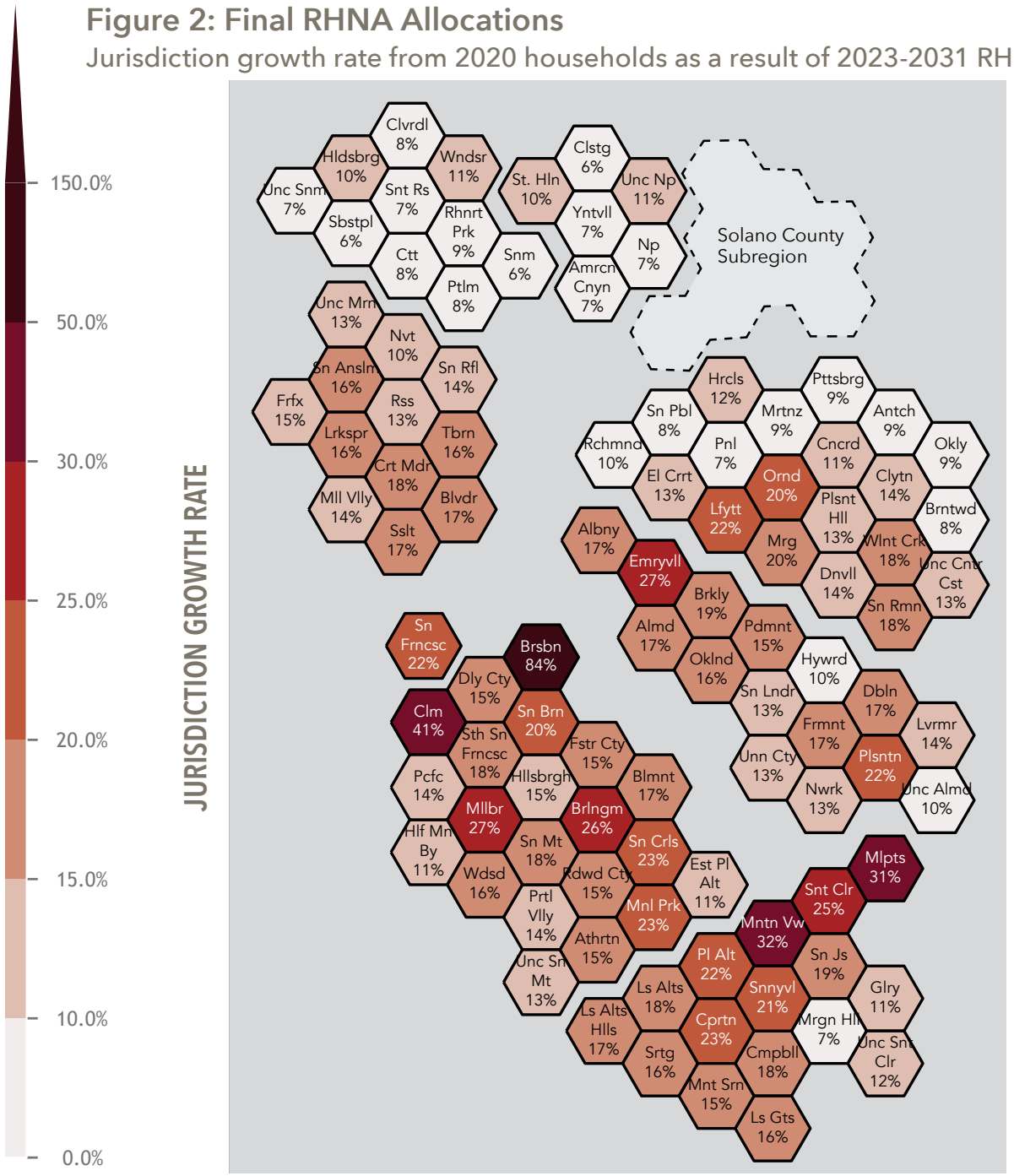
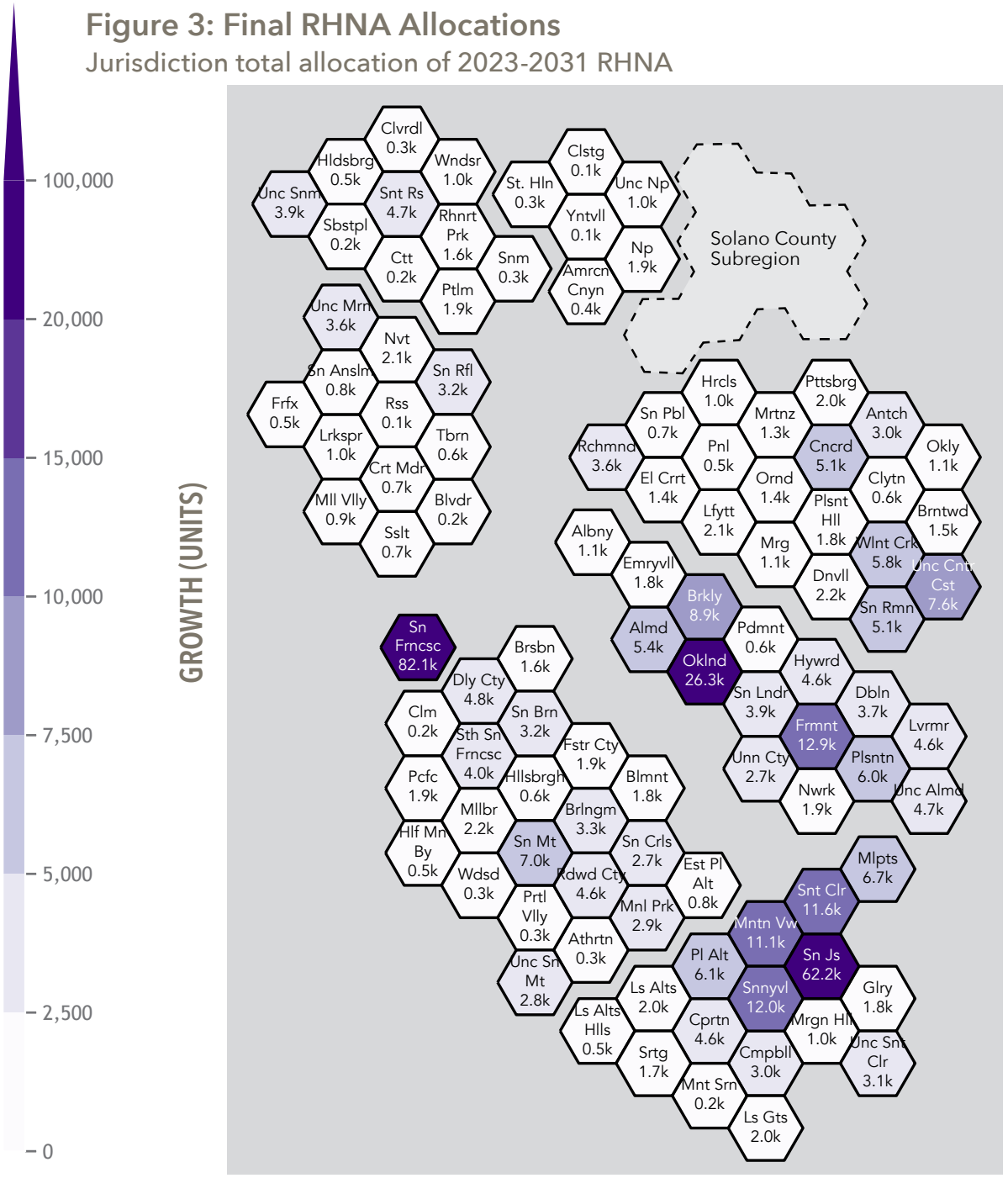


Figure 3: Final RHNA Allocations

Jurisdiction total allocation of 2023-2031 RHNA



RHNA STATUTORY OBJECTIVES AND FACTORS

As noted previously, Housing Element Law requires the RHNA methodology to further five objectives that recognize the importance of comprehensively planning for housing in ways that also promote equity, strengthen the economy, improve connections between jobs and housing, and protect the environment. The statutory objectives, and the ways in which the Bay Area's final RHNA methodology meets them, are described below. See also Appendix 1 for HCD's findings about how the RHNA methodology furthers the RHNA objectives.

RHNA Objectives

OBJECTIVE 1 – **"increasing the housing supply and the mix of housing types, tenure, and affordability in all cities and counties within the region in an equitable manner, which shall result in each jurisdiction receiving an allocation of units for low- and very low-income households."**

The methodology furthers this objective by allocating a share of the region's housing need across all income categories to all jurisdictions in the Bay Area. As a result, all jurisdictions receive an allocation of very low- and low-income units. The methodology allocates these units equitably, as the methodology allocation factors direct very low- and low-income units based primarily on a jurisdiction's access to opportunity. Accordingly, jurisdictions with the most residents living in census tracts designated as High Resource or Highest Resource on the California Tax Credit Allocation Committee (TCAC) 2020 Opportunity Map receive a higher share of their allocation as lower-income units than other jurisdictions in the region (see Appendix 3).

As shown in Appendix 3, jurisdictions with the highest housing costs also receive a higher share of their allocation as lower-income units than other jurisdictions in the region. Because jurisdictions must zone at higher densities to accommodate their allocations of low- and very-low-income units, the methodology will result in both greater affordability and a more diverse range of housing types throughout the region, particularly in the jurisdictions that currently lack affordable housing opportunities.

OBJECTIVE 2 – **"Promoting infill development and socioeconomic equity, the protection of environmental and agricultural resources, the encouragement of efficient development patterns, and the achievement of the region's greenhouse gas reductions targets provided by the State Air Resources Board pursuant to Section 65080."**

The intent of this objective is consistent with many of the strategies integrated into Plan Bay Area 2050. The final RHNA methodology incorporates the Plan Bay Area 2050 Final Blueprint as the data source for the baseline allocation used to assign each jurisdiction a beginning

share of the RHND, using each jurisdiction's share of the region's households in the year 2050. In effect, this baseline allocation takes into consideration a jurisdiction's existing total number of households plus its household growth from the Final Blueprint.

The Plan Bay Area 2050 uses the Bay Area UrbanSim 2.0[17] model to analyze a wide variety of land use data, such as access to jobs, services, and other destinations as informed by Plan Bay Area 2050 transportation investments. Therefore, the Final Blueprint prioritizes housing growth in three types of growth geographies, Priority Development Areas nominated by local jurisdictions, Transit-Rich Areas with lower greenhouse gas emissions potential, and High-Resource Areas with excellent access to jobs, schools, and more. The growth geographies in the Final Blueprint also exclude areas with high wildfire risk and areas outside urban growth boundaries. Accordingly, the methodology's use of Plan Bay Area 2050 results in an allocation that promotes infill development, protects environmental and agricultural resources, and reduces the region's greenhouse gas emissions.

The inclusion of job proximity by both automobile and transit as factors in the RHNA methodology complements the use of Plan Bay Area 2050 as the baseline allocation to further this objective. These factors direct more housing to the jurisdictions with the most jobs that can be accessed with a 30-minute commute by automobile or a 45-minute commute by transit. The inclusion of the Job Proximity – Transit factor encourages growth that capitalizes on the Bay Area's existing transit infrastructure, while the Job Proximity – Auto factor recognizes that most people in the region commute by automobile. Encouraging shorter commutes for all modes of travel is an important strategy for reducing greenhouse gas emissions.

© Noah Berger. All Rights Reserved.

As shown in **Appendix 3**, the final RHNA methodology results in jurisdictions with the most access to jobs and transit as well as jurisdictions with the lowest vehicle miles traveled per resident experiencing higher growth rates from their RHNA allocations than other jurisdictions in the region. Therefore, the methodology furthers the sustainability goals represented by this objective. The final RHNA methodology also promotes socioeconomic equity by expanding the range of housing choices available in all jurisdictions throughout the Bay Area with a particular emphasis on adding homes affordable to lower-income residents in jurisdictions with high resource areas to promote socioeconomic mobility.

OBJECTIVE 3 – "Promoting an improved intraregional relationship between jobs and housing, including an improved balance between the number of low-wage jobs and the number of housing units affordable to low-wage workers in each jurisdiction."

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

Moreover, the allocation factors in the final RHNA methodology focus entirely on job proximity and access to opportunity. Seventy percent of very low- and low-income units are allocated based on jurisdictions' access to opportunity according to the TCAC 2020 Opportunity Map methodology, which incorporates proximity to jobs filled by workers with less than a bachelor's degree. The remaining 30 percent of the lower-income units are allocated based on jurisdictions' proximity to jobs. Furthermore, 60 percent of the region's moderate- and above moderate-income units are allocated based on jurisdictions' proximity to jobs.

© Martin Klimek. All Rights Reserved.

As a result of differences in how units are distributed across income categories in the RHND, the final RHNA methodology allocates 48 percent of all units based on the factors related to job proximity. Thus, the methodology promotes an improved intraregional relationship between jobs and housing. As noted previously, the final RHNA methodology results in jurisdictions with the most access to jobs experiencing higher growth rates from their RHNA allocations than other jurisdictions in the region.

Also, as shown in **Appendix 3**, the final RHNA methodology results in jurisdictions with the most imbalanced jobs-housing fit (or, ratio between the number of low-wage jobs and the number of housing units affordable to low-wage workers) receiving a higher share of lower-income units than other jurisdictions.

OBJECTIVE 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 American Community Survey."

The final RHNA methodology allocates 70 percent of very low- and low-income units based on a jurisdiction's access to opportunity according to the TCAC 2020 Opportunity Map methodology, which scores jurisdictions partially based on their poverty rates and median home values. Consequently, jurisdictions with the most households in High Resource or Highest Resource census tracts have disproportionately large shares of higher-income residents and relatively small shares of lower-income residents. The final RHNA methodology furthers Objective 4 by allocating lower-income units directly to these jurisdictions with the most access to resources. As a result, the jurisdictions with the largest percentage of households with incomes above 120 percent of the area median income receive a significantly higher share of their RHNA as lower-income units than the jurisdictions with the largest percentage of households with incomes below 80 percent of area median income (see **Appendix 3**).

OBJECTIVE 5 – "Affirmatively furthering fair housing, which means taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics. Specifically, affirmatively furthering fair housing means taking meaningful actions that, taken together, address significant disparities in housing needs and in access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws."

The final RHNA methodology affirmatively furthers fair housing by emphasizing access to opportunity based on the data from the TCAC 2020 Opportunity Map. The Access to High Opportunity Areas factor assigns 70 percent of the region's very low- and low-income units and 40 percent of the region's moderate- and above moderate-income units.

The equity adjustment included in the final RHNA methodology also helps affirmatively further fair housing. This adjustment ensures that the 49 jurisdictions identified as exhibiting racial and socioeconomic demographics that differ from the regional average receive a share of the region's lower-income RHNA units that is at least proportional to the jurisdiction's share of existing households. Most of these 49 jurisdictions receive allocations that meet this proportionality threshold based on the final RHNA methodology's emphasis on access to

high opportunity areas. However, the equity adjustment ensures that the other 18 jurisdictions that might exhibit racial and economic exclusion but do not have significant shares of households living in high opportunity areas also receive proportional allocations.

Additionally, the final RHNA methodology's emphasis on affirmatively furthering fair housing is supported by the inclusion of High-Resource Areas as one of the growth geographies in the Plan Bay Area 2050 Final Blueprint. In the Final Blueprint, High-Resource Areas are defined as the Census tracts identified as High and Highest Resource in the State's Opportunity Map if they were inside a Priority Development Area (PDA) or if they were near transit in a jurisdiction that designated less than 50 percent of its PDA-eligible land as PDAs.[18]

As shown in **Appendix 3**, the allocations from the final RHNA methodology result in the jurisdictions with the highest percentage of residents living in High Resource or Highest Resource tracts in the TCAC 2020 Opportunity Map receiving a larger share of the region's lower-income units than other jurisdictions. With the equity adjustment, jurisdictions exhibiting above-average levels of racial and economic exclusion receive a share of the region's lower-income units that is 19 percent greater than their share of the region's households, and, as noted above, all of the 49 jurisdictions achieve the proportionality threshold. Thus, the methodology will require jurisdictions with the most access to opportunity and those with a pattern of excluding people of color and lower-income households to zone for a broader range of housing types, particularly housing that is affordable to lower-income households.

RHNA Methodology Factors

Housing Element Law also identifies factors that ABAG must consider in developing its RHNA methodology, to the extent sufficient data is available. The statutory factors, and the ways in which the Bay Area's final RHNA methodology meets them, are described below. Additionally, these factors were considered as part of the local jurisdiction survey conducted by ABAG. A summary of the results of the local jurisdiction survey, which helped provide local context on local conditions during the development of the methodology, is included as **Appendix 8**.

1. **Each member jurisdiction's existing and projected jobs and housing relationship. This shall include an estimate based on readily available data on the number of low-wage jobs within the jurisdiction and how many housing units within the jurisdiction are affordable to low-wage workers as well as an estimate based on readily available data, of projected job growth and projected household growth by income level within each member jurisdiction during the planning period.**

The final RHNA methodology directly incorporates each jurisdiction's existing and projected jobs-housing relationship in both the baseline allocation and the allocation factors. Forecasts from Plan Bay Area 2050 inform the baseline allocation, and Plan Bay Area 2050 emphasizes growth near job centers and includes strategies related to increased housing densities and office development subsidies to address jobs-housing imbalances in the region. The strategies incorporated into

the Final Blueprint help improve the region's jobs-housing balance, leading to shorter commutes—especially for low-income workers.

The final RHNA methodology amplifies the Plan Bay Area 2050 Final Blueprint's emphasis on improving jobs-housing balance by using factors related to job proximity to allocate nearly half of the RHND. These factors direct housing units to those jurisdictions with the most jobs that can be accessed with a 30-minute commute by automobile and/or a 45-minute commute by transit. The combination of the Access to High Opportunity Areas factor and job proximity factors for allocating lower-income RHNA units intends to enable more Bay Area workers to reside closer to their jobs, with an emphasis on providing more affordable housing in jurisdictions with the largest imbalance between low-wage jobs and housing affordable to low-wage workers.

The final RHNA methodology helps to create a more balanced relationship between housing and jobs by directing RHNA units to job-rich jurisdictions and jurisdictions with the most imbalanced jobs-housing fit. As shown in **Appendix 3**, jurisdictions with the largest share of the Bay Area's jobs receive allocations that result in the highest growth rates compared to the rest of the jurisdictions in the region. Additionally, the jurisdictions with the worst jobs-housing fit receive a larger share of their RHNA as affordable housing than other jurisdictions and receive a share of the RHND that is 22 percent greater than their share of the region's households. This outcome is supported by inclusion of the equity adjustment in the RHNA methodology, which directed additional lower-income units to jurisdictions with an imbalanced jobs-housing fit.

2. The opportunities and constraints to development of additional housing in each member jurisdiction, including all of the following:

a. **Lack of capacity for sewer or water service due to federal or state laws, regulations or regulatory actions, or supply and distribution decisions made by a sewer or water service provider other than the local jurisdiction that preclude the jurisdiction from providing necessary infrastructure for additional development during the planning period.**

b. **The availability of land suitable for urban development or for conversion to residential use, the availability of underutilized land, and opportunities for infill development and increased residential densities. The council of governments may not limit its consideration of suitable housing sites or land suitable for urban development to existing zoning ordinances and land use restrictions of a locality, but shall consider the potential for increased residential development under alternative zoning ordinances and land use restrictions. The determination of available land suitable for urban development may exclude lands where the Federal Emergency Management Agency (FEMA) or the Department of Water Resources has determined that the flood management infrastructure designed to protect that land is not adequate to avoid the risk of flooding.**

c. **Lands preserved or protected from urban development under existing federal or state programs, or both, designed to protect open space, farmland, environmental habitats, and natural resources on a long-term basis, including land zoned or designated for agricultural protection or preservation that is subject to a local ballot measure that was approved by the voters of that jurisdiction that prohibits or restricts conversion to nonagricultural uses.**

d. **County policies to preserve prime agricultural land, as defined pursuant to Section 56064, within an unincorporated area and land within an unincorporated area zoned or designated for agricultural protection or preservation that is subject to a local ballot measure that was approved by the voters of that jurisdiction that prohibits or restricts its conversion to nonagricultural uses.**

The opportunities and constraints to housing development are addressed through the incorporation of the Plan Bay Area 2050 Final Blueprint as the baseline allocation in the final RHNA methodology. In developing the Plan Bay Area 2050 Final Blueprint, ABAG-MTC staff worked with local governments to gather information about local plans, zoning, physical characteristics and potential development opportunities and constraints for each jurisdiction. This information is an input into the UrbanSim 2.0 model that uses a simulation of buyers and sellers in local real estate markets to estimate housing feasibility. In assessing feasibility, the UrbanSim 2.0 model also integrates the higher cost of building on parcels with physical development constraints, e.g., steep hillsides. Protected park land and open space are excluded from development in the model.

However, the Final Blueprint does not limit a jurisdiction's housing allocation based on local plans or zoning. The UrbanSim 2.0 model is used to forecast expanded growth potential in growth geographies identified in the Final Blueprint, such as Transit-Rich Areas and High Resource Areas. This allows additional feasible growth within the urban footprint by increasing allowable residential densities and expanding housing into select areas currently zoned for commercial and industrial uses.

The Plan Bay Area 2050 Final Blueprint maintains all existing urban growth boundaries, without any expansion, over the lifespan of the long-range plan. Existing urban growth boundaries, which take a variety of forms across the region but are relatively common in the Bay Area, help not only to protect prime agricultural lands from development, but also parks and open space as well. Land outside urban growth boundaries also tends not to have urban services such as sewer and water. The Final Blueprint also incorporates strategies to protect high-value conservation lands, including matching funds to help conserve high-priority natural and agricultural lands.

Including the Plan Bay Area 2050 Final Blueprint in the RHNA methodology addresses concerns about natural hazards, as the Final Blueprint excludes areas with unmitigated high hazard risk from Growth Geographies. The Final Blueprint Growth Geographies exclude CAL FIRE designated "Very High" fire severity areas in incorporated jurisdictions, and "High" and "Very High" fire severity areas

as well as county-designated wildland-urban interfaces (WUIs) where applicable in unincorporated areas.[19] The Final Blueprint strategies focus future growth away from the highest fire risk zones, support increased wildland management programs, and support residential building upgrades that reduce the likelihood for damage when fires occur in the wildland urban interface.

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

3. **The distribution of household growth assumed for purposes of a comparable period of regional transportation plans and opportunities to maximize the use of public transportation and existing transportation infrastructure.**

As noted above, the final RHNA methodology's baseline allocation directly incorporates the forecasted development pattern from Plan Bay Area 2050, the Bay Area's Regional Transportation Plan/Sustainable Communities Strategy. The growth geographies in Plan Bay Area 2050 emphasize access to transit, both in locally nominated Priority Development Areas and in regionally identified Transit-Rich Areas. This land use pattern is developed with complementary transportation investments in an effort to ensure past and future transportation investments are maximized.

The final RHNA methodology builds on the transit-focused development pattern from Plan Bay Area 2050 by also allocating 15 percent of the region's very low- and low-income units based on a jurisdiction's proximity to jobs that can be accessed by public transit. Thus, the methodology will encourage higher-density housing in jurisdictions with existing transit infrastructure, which can maximize the use of public transportation in these communities.

Similarly, the results in **Appendix 3** demonstrate that the jurisdictions with the largest share of the region's Transit Priority Area (TPA)[20] acres experience significantly higher growth rates from the final RHNA methodology than other jurisdictions. The 25 jurisdictions with the most TPA acreage grow by 18 percent on average as a result of allocations from the final RHNA methodology. All other jurisdictions grow by 12 percent on average. The jurisdictions with the most access to public transit receive the most growth from the final RHNA methodology, which will encourage the use of public transportation and existing transportation infrastructure.

4. **Agreements between a county and cities in a county to direct growth toward incorporated areas of the county and land within an unincorporated area zoned or designated for agricultural protection or preservation that is subject to a local ballot measure that was approved by the voters of the jurisdiction that prohibits or restricts conversion to nonagricultural uses.**

Use of the Plan Bay Area 2050 Final Blueprint as the RHNA baseline integrates several key strategies related to agricultural preservation. First, the growth pattern in the Final Blueprint is significantly driven by the urban growth boundaries strategy which maintains all existing urban growth boundaries, without any expansion, over the lifespan of the long-range plan. Second, this strategy is supported by an agricultural land preservation strategy that helps to acquire land for permanent agricultural use.

At the same time, because urban growth boundaries often extend outside of existing city limits, there remains a limited amount of unincorporated county growth in the Plan Bay Area 2050 Final Blueprint. ABAG-MTC will continue discussions with local jurisdictions about opportunities to direct additional RHNA units to incorporated areas, including the use of the provisions in Housing Element Law that allow a county transfer a portion of its RHNA allocation to a city or town after it receives its RHNA allocation from ABAG.[21]

© UNKNOWN courtesy SAHA. All Rights Reserved.

5. The loss of units contained in assisted housing developments, as defined in paragraph (9) of subdivision (a) of Section 65583, that changed to non-low-income use through mortgage prepayment, subsidy contract expirations, or termination of use restrictions.

Comprehensive data about the loss of assisted housing units is not available for all Bay Area jurisdictions in a consistent format. Jurisdictions that provided information on this topic as part of the survey of local jurisdictions often relied on internal data sources. Twenty-seven percent of survey respondents stated their jurisdiction had lost subsidized affordable housing units in the past 10 years, and 32 percent noted they expected to lose units in the next 10 years. Given the lack of consistent data, this topic was not included as a specific factor in the final RHNA methodology. The loss of assisted housing units for lower-income households is an issue that would best be addressed by local jurisdictions when preparing their Housing Elements. ABAG included available data in its preapproved data package as a starting point for supporting local jurisdictions in addressing this issue.

6. The percentage of existing households at each of the income levels listed in subdivision (e) of Section 65584 that are paying more than 30 percent and more than 50 percent of their income in rent.

During the consultation process for the RHND, ABAG worked with HCD to compare the Bay Area's share of cost-burdened households to comparable regions throughout the United States. The comparison used data

from the 2012-2016 Comprehensive Housing Affordability Strategy (CHAS) to evaluate cost burden for lower-income and higher-income households. The averages of these cost burdens by income group formed the basis for an adjustment that was included in the RHND.[22]

The data analysis prepared for the RHND indicated that approximately 66 percent of Bay Area households earning less than 80 percent of the Area Median Income (AMI) are cost-burdened, while 16 percent of households earning above 80 percent AMI are cost-burdened. The prevalence of cost burden as a concern for many Bay Area households was confirmed by the results of the survey sent to local jurisdictions, where 51 respondents (72 percent) indicated that high housing costs and high rates of cost burden affect housing needs in their jurisdictions.

The UrbanSim 2.0 model used to develop the Plan Bay Area 2050 Final Blueprint considers both housing costs and relative incomes when forecasting future growth. Moreover, Plan Bay Area 2050 incorporates multiple strategies to address housing unaffordability, including allowing a greater mix of housing types and densities in the plan's growth geographies, reducing barriers to housing near transit and in areas of high opportunity, transforming aging malls and office parks into mixed-income neighborhoods, raising additional funding for affordable housing, requiring 10 to 20 percent of new housing to be affordable, and strengthening renter protections beyond current state regulations.

The final RHNA methodology further addresses cost-burdened households in the Bay Area – particularly the high percentage of cost-burdened households earning less than 80 percent of AMI – by allocating lower-income units to all jurisdictions, particularly those with the most access to opportunity. The methodology allocates 70 percent of the region's lower-income units based on jurisdictions' access to opportunity according to the TCAC 2020 Opportunity Map.

As shown in **Appendix 3**, the jurisdictions with the highest housing costs receive a larger percentage of their RHNA as lower-income units than other jurisdictions in the region, and the jurisdictions with the most households in High or Highest Resource census tracts also receive a larger percentage of their allocations as lower-income units than other jurisdictions.

Local governments will have an opportunity to address jurisdiction-specific issues related to cost-burdened households when they update their housing elements. ABAG-MTC staff included data on jurisdiction-specific rates of housing cost burden as part of housing data packets prepared to assist with housing element updates.

7. The rate of overcrowding.

During the consultation process for the RHND, ABAG worked with HCD to compare the Bay Area's rate of overcrowding to comparable regions throughout the United States. The comparison used data from the 2014-2018 American Community Survey (ACS) to evaluate overcrowding. The Bay Area's overcrowding rate of 6.73 percent is nearly double the rate of comparable regions. Consequently, ABAG's RHND includes an overcrowding adjustment.[23]

Overcrowding rates are inputs into the Plan Bay Area 2050 regional growth forecast, which informs the baseline allocation in the final RHNA methodology. As noted earlier, Plan Bay Area 2050 also directly incorporates multiple strategies to address housing affordability, and these strategies also seek to reduce overcrowding.

Like housing cost burden, overcrowding indicates a lack of adequate housing supply, especially housing units affordable for lower-income households. The final RHNA methodology seeks to expand the housing supply, and especially the supply of affordable units, within the most expensive parts of the region, which can help reduce the rates of overcrowding experienced by Bay Area households. As shown in **Appendix 3**, the final RHNA methodology results in the jurisdictions with the highest housing costs receiving a larger percentage of their RHNA as lower-income units than other jurisdictions and a share of the region's total RHNA that is 8 percent larger than their share of the region's households.

Local governments will have an opportunity to address jurisdiction-specific issues related to overcrowded households when they update their housing elements. ABAG-MTC staff included data on jurisdiction-specific rates of overcrowding as part of housing data packets prepared to assist with housing element updates.

8. The housing needs of farmworkers.

ABAG included questions about housing needs for the region's farmworkers in its survey of local jurisdictions, however consistent data is not available for all Bay Area jurisdictions. ABAG's final RHNA methodology incorporates this factor through its emphasis on proximity to jobs, which includes agricultural jobs. As shown in **Appendix 3**, the final RHNA methodology also results in jurisdictions with the most low-wage jobs per housing unit affordable to low-wage workers receiving higher percentages of affordable housing compared to other jurisdictions in the region. This outcome is supported by inclusion of the equity adjustment in the RHNA methodology, which directed additional lower-income units to jurisdictions with an imbalanced jobs-housing fit. As a result, jurisdictions with larger farmworker housing need will be expected to provide more very low- and low-income units to meet this demand.

© Karl Nielsen. All Rights Reserved.

9. The housing needs generated by the presence of a private university or a campus of the California State University or the University of California within any member jurisdiction.

Responses to questions from ABAG's Local Jurisdiction Survey about housing demand created by postsecondary educational institutions indicate a need for better data collection on this issue. Despite the lack of precise data on this topic at the local level, the housing needs generated by postsecondary institutions are incorporated into Plan Bay Area 2050, which directly informs the baseline allocation of the final RHNA methodology. The Regional Growth Forecast projects the number of households and group quarters residents, some of whom are students. Additionally, the local growth patterns developed for the Plan Bay Area 2050 Final Blueprint using UrbanSim consider the presence of major universities as well as these institutions' residential and non-residential pipeline projects.

Moreover, the RHNA methodology allocates nearly half of all units based on proximity to jobs, and postsecondary education institutions tend to be significant job centers. Therefore, the methodology will allocate more housing to jurisdictions near community colleges or public and private universities, which will result in additional housing units that can enable these jurisdictions to address the housing needs of students, faculty, and staff at these institutions.

© Bruce Damonte courtesy CHP. All rights reserved.

10. The housing needs of individuals and families experiencing homelessness.

Comprehensive jurisdiction-level data about individuals and families experiencing homelessness is not available for all Bay Area jurisdictions in a consistent format. As a result, this topic was not included as a specific factor in the final RHNA methodology. However, the methodology does consider the housing needs of individuals and families experiencing homelessness by allocating very low- and low-income units to all jurisdictions throughout the region. As the RHNA methodology focuses on access to opportunity and proximity to jobs, the methodology can help ensure that housing targeted toward people experiencing homelessness can enable them to access employment and other essential resources for stability and economic mobility. Furthermore, ABAG will encourage all local jurisdictions to adequately plan for the needs of those experiencing homelessness in their housing elements.

11. The loss of units during a state of emergency that was declared by the Governor pursuant to the California Emergency Services Act (Chapter 7 (commencing with Section 8550) of Division 1 of Title 2), during the planning period immediately preceding the relevant revision pursuant to Section 65588 that have yet to be rebuilt or replaced at the time of the analysis.

ABAG received two responses in the survey of local jurisdictions that identified the number of units lost during declared states of emergency. The City of Santa Rosa indicated that 3,043 housing units were lost on October 8, 2017 and that, as of February 2020 when the survey was conducted, 2,323 units had been completed or were in the construction/permitting process. The County of Sonoma stated the unincorporated county lost 2,200 units in the 2017 Sonoma Complex Fires and 1,235 units had been rebuilt or were under construction as of February 2020. The County also lost 176 units in the 2019 Kincade fire and 4 were in the process of being rebuilt as of February 2020. Unincorporated Napa County also reported to the California Department of Finance (DOF) that it lost 587 housing units during the wildfires that took place in 2017.

In developing the RHND, HCD analyzed Bay Area jurisdictions' annual reports to DOF and found that the ten-year annual average rate of demolitions for the Bay Area is 0.40 percent of the housing stock. The RHND included HCD's minimum replacement adjustment of 0.5 percent, which exceeds the region's demolition rate. This adjustment added 15,120 housing units to the RHND. Since the demolition adjustment in the RHND included significantly more units than were lost, it was not necessary to include a specific factor in the final RHNA methodology to address the loss of units.

12. The region's greenhouse gas emissions targets provided by the State Air Resources Board pursuant to Section 65080.

Plan Bay Area 2050, which is used as the baseline allocation in the final RHNA methodology, includes a diverse range of strategies to reduce greenhouse gas emissions, including:

ABAG-MTC Photo Archive.

- Focusing more housing growth in areas near high-quality public transit and in high-resource communities near job centers
- Redeveloping aging malls and office parks in mixed-income communities
- Vastly expanding the amount of funding for production and preservation of affordable housing
- Focusing more job growth near high-quality public transit, especially in housing-rich communities to address jobs-housing imbalance
- Investing in new local and regional rail lines, express buses, local bus systems, and more to serve communities across the Bay Area
- Investing in world-class bicycle and pedestrian infrastructure in all communities to enable neighborhood trips to be completed without a car.

The greenhouse gas reduction forecasts in Plan Bay Area 2050 are subject to the review of the State Air Resources Board. The Final Blueprint meets and exceeds the 19 percent per-capita target set for this planning cycle.

Additionally, the final RHNA methodology's allocation factors focus on locating housing near jobs. As a result, as shown in **Appendix 3**, jurisdictions with the most access to jobs and transit as well as those with the lowest VMT per resident experience higher growth rates resulting from the final RHNA methodology's allocations.

13. Any other factors adopted by the council of governments, that further the objectives listed in subdivision (d) of Section 65584, provided that the council of governments specifies which of the objectives each additional factor is necessary to further.

No other planning factors were adopted by ABAG to review as a specific local planning factor.

RHNA SUBREGIONS

Housing Element Law allows two or more jurisdictions to form a "subregion" to conduct a parallel RHNA process to allocate the subregion's housing need among its members. A subregion is responsible for conducting its own RHNA process that meets all of the statutory requirements related to process and outcomes, including developing its own RHNA methodology, allocating a share of need to each member jurisdiction, and conducting its own appeals process. The subregion's final allocation must meet the same requirements as the regional allocation: it must further the statutory objectives, have considered the statutory factors, and be consistent with the development pattern of Plan Bay Area 2050.

For the 2023 to 2031 RHNA, a subregion was formed in Solano County that includes City of Benicia, City of Dixon, City of Fairfield, City of Rio Vista, City of Suisun City, City of Vacaville, City of Vallejo, and County of Solano.

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

The ABAG Executive Board approved the release of Draft Subregional Shares for public comment on October 15, 2020. ABAG received no comments on the Draft Subregional Shares during the public comment period. The Final Subregional Shares, as shown in Table 5 (below), were approved by the ABAG Executive Board on January 21, 2021.

The Solano Subregion adopted its final RHNA allocations on November 18, 2021. See website **https://www.solanocounty.com/depts/rm/planning/regional_housing_needs_allocation_and_housing_element.asp** for more information.

Table 5: **Final Subregional Shares, Total Units by Income Category**

Subregion	VERY LOW	LOW	MODERATE	ABOVE MODERATE	TOTAL
Solano County	**2,803**	**1,612**	**1,832**	**4,745**	**10,992**

NEXT STEPS

Housing Element Due Date

Housing Element updates for Bay Area jurisdictions are due to HCD by January 31, 2023. See **HCD's website** for more information.

Unincorporated County Transfer of RHNA Units

Government Code Section 65584.07 recognizes some of the specific challenges unincorporated areas face by including provisions available only to counties that allow for a transfer of RHNA units to incorporated cities and towns in the county. ABAG-MTC staff is prepared to work with interested jurisdictions to facilitate approval of RHNA transfers.

One option allowed by the statute is for the County and one or more jurisdictions to voluntarily agree on a transfer of units from the County to the city or town. By statute, voluntary transfers can be completed following ABAG's adoption of the final RHNA plan and prior to the Housing Element due date (January 31, 2023). A second option is for a County to transfer units following annexation of unincorporated land to a city or town. By statute, transfers related to annexations can occur at any point during the RHNA cycle, as long as the request is submitted to ABAG within 90 days of the annexation.

Statewide Effort to Improve RHNA Process

Assembly Bill 101 (2019) requires HCD, in collaboration with the Office of Planning and Research and after engaging in stakeholder participation, to develop a recommended improved RHNA process and methodology that promotes and streamlines housing development and substantially addresses California's housing shortage. HCD must report its findings and recommendations to the Legislature by December 31, 2022.[24] ABAG looks forward to engaging in this effort to evaluate and improve the RHNA process in advance of the next RHNA cycle.

© Barrie Rokeach, 2019. All Rights Reserved

ENDNOTES

1 *Government Code Section 65580 covers all facets of Housing Element Law. The RHNA process is covered in Section 65584. RHNA factors are covered in Section 65584.04; objectives are covered in 65584(d).*

2 *The four income categories included in the RHND are:*
- *Very Low Income: 0-50% of Area Median Income*
- *Low Income: 50-80% of Area Median Income*
- *Moderate Income: 80-120% of Area Median Income*
- *Above Moderate Income: 120% or more of Area Median Income*

3 *Read more on the HCD Regional Housing Needs Allocation and Housing Elements web page.*

4 *More details about the RHND is available on the ABAG RHNA website (scroll to bottom of page). At this time, the RHND has been finalized by the State for the Bay Area's RHNA process.*

5 *Government Code Section 65584.01.*

6 *Government Code Section 65584(d).*

7 *Government Code Section 65584.04(m)(1).*

8 *According to Government Code Section 65584(e), affirmatively furthering fair housing means "For purposes of this section, "affirmatively furthering fair housing" means taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics. Specifically, affirmatively furthering fair housing means taking meaningful actions that, taken together, address significant disparities in housing needs and in access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws."*

9 *See State of California Government Code Section 65584.04(b)(1).*

10 *A summary of the Local Jurisdiction Survey responses is available on the ABAG website.*

11 *For letters HCD sent to other regions, see the January 2020 HMC meeting agenda packet.*

12 *The final RHNA methodology and Plan Bay Area 2050 are consistent for all nine counties and in 33 of 34 superdistricts (i.e., sub-county areas) using the methodology developed during the HMC process. In the one superdistrict flagged during the consistency check, the Final Blueprint reflects the loss of more than 1,000 homes in wildfires since 2015. Anticipated reconstruction of these units during the RHNA period does not yield significant net growth in housing units, making these allocations consistent with the Final Blueprint long-range projections.*

13 *Plan Bay Area 2050 is the long-range regional plan for the San Francisco Bay Area, serving as the 2021 Regional Transportation Plan/Sustainable Communities Strategy for the Bay Area*

14 *For more information on the Opportunity Map, see pages 10-13 of this document from the March 2020 HMC meeting's agenda packet.*

15 *See Government Code Section 65584(e).*

16 *Jurisdictions with above-average levels of racial and economic exclusion were identified based on their divergence index scores and their percentage of households above 120 percent Area Median Income. The divergence index score is a calculation of how different a jurisdiction's racial demographics are from the region's demographics. If a jurisdiction has the same racial distribution as the region, the jurisdiction's divergence index is scored at 0. The more a jurisdiction's demographics diverge from the regional distribution, the higher the divergence index score. A high score does not necessarily indicate that the jurisdiction is racially homogenous, only that its demographic profile differs markedly from the region's racial demographics. Given the multitude of racial and ethnic groups in the Bay Area, the Othering and Belonging Institute at UC Berkeley has identified the Divergence Index as the best measure of segregation in the region in part because this measure captures segregation for multiple racial groups simultaneously.*

17 *Bay Area UrbanSim 2.0 is a spatially explicit economic model that forecasts future business and household locations. It forecasts future land use change (e.g., development or redevelopment) starting from an integrated base year database containing information on the buildings, households, businesses and land use policies within the region. During the simulation, Bay Area UrbanSim 2.0 forecasts the choices real estate developers make on how much, what, and where to build, based upon future-focused public policy inputs (strategies & growth geographies adopted for use in Plan Bay Area 2050). This adds additional housing units and commercial space in profitable locations (i.e., land use policies at the site allow the construction of a building that is profitable under forecast demand). Additional documentation for Bay Area UrbanSim 2.0 is available at: https://github.com/UDST/bayarea_urbansim*

18 *For purposes of designating High-Resource Areas in the Final Blueprint, "near transit" was defined as within 1/2 mile of a rail station, ferry terminal or bus stop with peak headways of 15 minutes or less, or within 1/4 mile of a bus stop with peak headways of 30 minutes or less.*

19 *The only exception is for locally-nominated Priority Development Areas (PDAs). The only PDA affected was the Urbanized Corridor PDA in Marin County.*

20 *Transit Priority Areas are defined in the California Public Resources Code, Section 21099 as areas within 1/2 mile of a Major Transit stop, which could be any of the following:*
- *Existing rail stations*
- *Planned rail stations in an adopted Regional Transportation Plan*
- *Existing ferry terminals with bus or rail*
- *Planned ferry terminals with bus or rail service in an adopted Regional Transportation Plan*
- *Intersection of at least two existing or planned bus routes with headways of 15 minutes or better during both the morning and evening peak periods*

21 *Government Code Section 65584.07.*

22 *See the June 9, 2020 letter in which HCD provided the RHND for the Bay Area.*

23 *See the June 9, 2020 letter in which HCD provided the RHND for the Bay Area.*

24 *Health and Safety Code Section 50515.05*

APPENDICES

Appendix 1:
Letter from HCD Approving ABAG's Draft RHNA Methodology

Appendix 2:
Bay Area Regional Housing Needs Determination Letter from HCD

Appendix 3:
Evaluation Metrics

Appendix 4:
Factor Scores by Jurisdiction

Appendix 5:
Final RHNA Allocation by Jurisdiction, with Factor Components

Appendix 6:
Equity Adjustment

Appendix 7:
Draft RHNA Allocations

Appendix 8:
Summary of Local Jurisdiction Survey Results

© Jim Maurer, 2018. All Rights Reserved.

STATE OF CALIFORNIA - BUSINESS, CONSUMER SERVICES AND HOUSING AGENCY GAVIN NEWSOM, *Governor*

DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
DIVISION OF HOUSING POLICY DEVELOPMENT
2020 W. El Camino Avenue, Suite 500
Sacramento, CA 95833
(916) 263-2911 / FAX (916) 263-7453
www.hcd.ca.gov

April 12, 2021

Therese W. McMillan, Executive Director
Association of Bay Area Governments
375 Beale Street, Suite 700
San Francisco, CA 94105

Dear Executive Director Therese W. McMillan:

RE: Review of Draft Regional Housing Need Allocation (RHNA) Methodology

Thank you for submitting the draft Association of Bay Area Governments (ABAG) Sixth Cycle Regional Housing Need Allocation (RHNA) Methodology. Pursuant to Government Code Section 65584.04(i), the California Department of Housing and Community Development (HCD) is required to review draft RHNA methodologies to determine whether a methodology furthers the statutory objectives described in Government Code Section 65584(d).

In brief, the draft ABAG RHNA methodology begins with the total regional determination provided by HCD of 441,176 units and uses a baseline allocation to assign each jurisdiction a beginning share of the units. The baseline allocation is based on each jurisdiction's share of the region's total households in the year 2050 from the Plan Bay Area Final Blueprint. The methodology then applies one set of factors and weights to adjust the baseline allocation for the very low and low units, and another set for moderate and above moderate units to address the statutory objectives.

For the low- and very low-income allocations, the methodology uses three adjustments: access to high opportunity areas (70 percent), job proximity by auto (15 percent), and job proximity by transit (15 percent). For the moderate and above moderate allocations, the methodology uses two adjustments: access to high opportunity areas (40 percent) and job proximity by auto (60 percent).

Lastly, the methodology applies an equity adjustment that identifies 49 jurisdictions that exhibit higher racial segregation and higher median incomes than regional averages. The adjustment ensures each jurisdiction receives an allocation of lower income units that is proportional to its share of the region's total households in 2020.

--continued on next page--

--continued from previous page--

HCD has completed its review of the methodology and finds that the draft ABAG RHNA Methodology furthers the statutory objectives described in Government Code 65584(d).[1] HCD acknowledges the complex task of developing a methodology to allocate RHNA to 109 jurisdictions while furthering the five statutory objectives of RHNA. This methodology largely distributes more RHNA near jobs, transit and resources linked to long-term improvements of life outcomes. In particular, HCD applauds the use of objective factors specifically linked to the statutory objectives.

HCD commends ABAG for a robust methodology development process, with exceptional stakeholder engagement, through its Housing Methodology Committee (HMC). The HMC consisted of nine elected officials and 12 planning staff, with representation from all six ABAG counties. It also consisted of 16 diverse regional stakeholders. This combination of elected officials, local government staff, and regional stakeholders met 12 times over the course of a nearly one calendar year.

Below is a brief summary of findings related to each statutory objective described within Government Code Section 65584(d):

1. Increasing the housing supply and the mix of housing types, tenure, and affordability in all cities and counties within the region in an equitable manner, which shall result in each jurisdiction receiving an allocation of units for low- and very low-income households.

On a per capita basis, the methodology allocates larger shares of RHNA to higher income jurisdictions, resulting in an allocation larger than their existing share of households. Jurisdictions with more expensive housing units – an indicator of higher housing demand – receive larger allocations on a per capita basis. For example, Palo Alto and Menlo Park have some of the highest housing costs in the region, according to American Community Survey Data. Both jurisdictions receive a share of the regional RHNA that is larger than their share of the region's population, putting them in the top 15 per capita allocations. Additionally, jurisdictions with higher rates of home ownership and single-family homes receive slightly larger lower-income allocations as a percentage of their total RHNA (supporting a mix of housing types).

2. Promoting infill development and socioeconomic equity, the protection of environmental and agricultural resources, the encouragement of efficient development patterns, and the achievement of the region's greenhouse gas reductions targets provided by the State Air Resources Board pursuant to Section 65080.

The draft ABAG methodology encourages a more efficient development pattern by allocating nearly twice as many RHNA units to jurisdictions with higher jobs access, on a per capita basis. Jurisdictions with higher jobs access via transit also receive more RHNA on a per capita basis.

--continued on next page--

[1] While HCD finds this methodology compliant, applying this methodology to another region or cycle may not necessarily further the statutory objectives as housing conditions and circumstances may differ.

--continued from previous page--

Jurisdictions with the lowest vehicle miles traveled (VMT) per capita, relative to the region, receive more RHNA per capita than those with the highest per capita VMT. ABAG's largest individual allocations go to its major cities with low VMT per capita and better access to jobs. For example, San Francisco – which has the largest allocation – has the lowest per capita VMT and is observed as having the highest transit accessibility in the region. As a major employment center, San Jose receives a substantial RHNA allocation despite having a higher share of solo commuters and a lower share of transit use than San Francisco. However, to encourage lower VMT in job-rich areas that may not yet be seeing high transit ridership, ABAG's Plan Bay Area complements more housing in these employment centers (which will reduce commutes by allowing more people to afford to live near jobs centers) with strategies to reduce VMT by shifting mode share from driving to public transit.

3. Promoting an improved intraregional relationship between jobs and housing, including an improved balance between the number of low-wage jobs and the number of housing units affordable to low-wage workers in each jurisdiction.

The draft ABAG methodology allocates more RHNA units to jurisdictions with more jobs. Jurisdictions with a higher jobs/housing imbalance receive higher RHNA allocations on a per capita basis. For example, jurisdictions within the healthy range of 1.0 to 1.5 jobs for every housing unit receive, on average, a RHNA allocation that is 61% of their current share of households. Jurisdictions with the highest imbalances – 6.2 and higher – receive an average allocation 1.21 times their current share of households. Lastly, higher income jurisdictions receive larger lower income allocations relative to their existing lower income job shares.

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 American Community Survey.

On average, cities with a larger existing share of lower income units receive smaller allocations of low- and very-low income units as a percentage of their total RHNA. For example, East Palo Alto's current percentage of households that are lower income is the highest in the ABAG region and it receives the lowest lower income allocation as a percentage of its total RHNA. San Pablo's percentage of households that are lower income is the second highest in the region and its lower income allocation as a percentage of its total RHNA is lower than 92% of other jurisdictions. Cities with smaller shares of existing lower income units receive larger allocations of low- and very low-income units as a percentage of their total RHNA.

5. Affirmatively furthering fair housing, which means taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics. Specifically, affirmatively furthering fair housing means taking meaningful actions that, taken together, address significant disparities in housing needs and in access

--continued from previous page--

to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws.

HCD applauds the significant weighting of Access to High Opportunity Areas as an adjustment factor and including an equity adjustment in the draft methodology. ABAG's methodology allocates more RHNA to jurisdictions with higher access to resources on a per capita basis. Additionally, those higher-resourced jurisdictions receive even larger lower income RHNA on a per capita basis. For example, the high-resourced communities of Cupertino and Mountain View receive higher total allocations on a per capita basis. For lower resourced jurisdictions with high rates of segregation, such as East Palo Alto, their allocations – particularly lower income RHNA allocations – are much lower on a per capita basis.

HCD appreciates the active role of ABAG staff in providing data and input throughout the draft ABAG RHNA methodology development and review period. HCD especially thanks Gillian Adams, Dave Vautin, and Aksel Olsen for their significant efforts and assistance.

HCD looks forward to continuing our partnership with ABAG to assist its member jurisdictions to meet and exceed the planning and production of the region's housing need.

Support opportunities available for the ABAG region this cycle include, but are not limited to:

- SB 2 Planning Grants Technical Assistance: Ongoing regionally tailored technical assistance will also remain available throughout the housing element development timeline. Technical assistance information is available at https://www.hcd.ca.gov/community-development/planning-grants-ta.shtml.

- HCD also encourages all ABAG's local governments to consider the many other affordable housing and community development resources available to local governments, including the Permanent Local Housing Allocation. HCD's programs can be found at https://www.hcd.ca.gov/grants-funding/nofas.shtml.

If HCD can provide any additional assistance, or if you, or your staff, have any questions, please contact Tom Brinkhuis, Housing Policy Specialist at (916) 263-6651 or tom.brinkhuis@hcd.ca.gov.

Megan Kirkeby
Deputy Director

STATE OF CALIFORNIA - BUSINESS, CONSUMER SERVICES AND HOUSING AGENCY GAVIN NEWSOM, *Governor*

DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
DIVISION OF HOUSING POLICY DEVELOPMENT
2020 W. El Camino Avenue, Suite 500
Sacramento, CA 95833
(916) 263-2911 / FAX (916) 263-7453
www.hcd.ca.gov

June 9, 2020

Therese W. McMillan, Executive Director
Association of Bay Area Governments
375 Beale Street. Suite 700
San Francisco, CA 94105

Dear Therese W. McMillan,

RE: Final Regional Housing Need Determination

This letter provides the Association of Bay Area Governments (ABAG) its final Regional Housing Need Determination. Pursuant to state housing element law (Government Code section 65584, et seq.), the Department of Housing and Community Development (HCD) is required to provide the determination of ABAG's existing and projected housing need.

In assessing ABAG's regional housing need, HCD and ABAG staff completed an extensive consultation process from March 2019 through May 2020 covering the methodology, data sources, and timeline for HCD's determination of the Regional Housing Need. HCD also consulted with Walter Schwarm with the California Department of Finance (DOF) Demographic Research Unit.

Attachment 1 displays the minimum regional housing need determination of **441,176** total units among four income categories for ABAG to distribute among its local governments. Attachment 2 explains the methodology applied pursuant to Gov. Code section 65584.01. In determining ABAG's housing need, HCD considered all the information specified in state housing law (Gov. Code section 65584.01(c)).

As you know, ABAG is responsible for adopting a methodology for RHNA allocation and RHNA Plan for the projection period beginning June 30, 2022 and ending December 31, 2030. Pursuant to Gov. Code section 65584(d), the methodology to prepare ABAG's RHNA plan must further the following objectives:

(1) Increasing the housing supply and mix of housing types, tenure, and affordability
(2) Promoting infill development and socioeconomic equity, protecting environmental and agricultural resources, and encouraging efficient development patters
(3) Promoting an improved intraregional relationship between jobs and housing
(4) Balancing disproportionate household income distributions
(5) Affirmatively furthering fair housing

Pursuant to Gov. Code section 65584.04(d), to the extent data is available, ABAG shall include the factors listed in Gov. Code section 65584.04(d)(1-13) to develop its RHNA

plan, and pursuant to Gov. Code section 65584.04(f), ABAG must explain in writing how each of these factors was incorporated into the RHNA plan methodology and how the methodology furthers the statutory objectives described above. Pursuant to Gov. Code section 65584.04(h), ABAG must submit its draft methodology to HCD for review.

Increasing the availability of affordable homes, ending homelessness, and meeting other housing goals continues to be a priority for the State of California. To support these goals the 2019-20 Budget Act allocated $250 million for all regions and jurisdictions for planning activities through the Regional Early Action Planning (REAP) and Local Early Action Planning (LEAP) Grant programs. ABAG has $ 23,966,861 available through the REAP program and HCD applauds ABAG's efforts to engage early on how best to utilize these funds and HCD looks forward to continuing this collaboration. All ABAG jurisdictions are also eligible for LEAP grants and are encouraged to apply to support meeting and exceeding sixth cycle housing element goals. While the SB 2 Planning Grant deadline has passed, ongoing regionally tailored technical assistance is still available through that program.

In addition to these planning resources HCD encourages local governments to consider the many other affordable housing and community development resources available to local governments that can be found at *https://www.hcd.ca.gov/grants-funding/nofas.shtml*

HCD commends ABAG and its leadership in fulfilling its important role in advancing the state's housing, transportation, and environmental goals. ABAG is also recognized for its actions in proactively educating and engaging its board and committees on the RHNA process and the regional housing need, as well as creating tools to aid the public understanding in the process. HCD especially thanks Paul Fassinger, Gillian Adams, Aksel Olsen, Dave Vautin, Bobby Lu, Matt Maloney, and Elizabeth Bulgarin for their significant efforts and assistance. HCD looks forward to its continued partnership with ABAG and its member jurisdictions and assisting ABAG in its planning efforts to accommodate the region's share of housing need.

If HCD can provide any additional assistance, or if you, or your staff, have any questions, please contact Megan Kirkeby, Acting Deputy Director, at *megan.kirkeby@hcd.ca.gov* or Tom Brinkhuis, Housing Policy Specialist at (916) 263-6651 or *tom.brinkhuis@hcd.ca.gov*.

Sincerely,

Megan Kirkeby
Acting Deputy Director

Enclosures

ATTACHMENT 1

HCD REGIONAL HOUSING NEED DETERMINATION
ABAG: June 30, 2022 through December 31, 2030

Income Category	Percent	Housing Unit Need
Very-Low*	25.9%	114,442
Low	14.9%	65,892
Moderate	16.5%	72,712
Above-Moderate	42.6%	188,131
Total	**100.0%**	**441,176**
* Extremely-Low	15.5%	Included in Very-Low Category

Notes:
Income Distribution:
Income categories are prescribed by California Health and Safety Code (Section 50093, et. seq.). Percents are derived based on Census/ACS reported household income brackets and county median income, then adjusted based on the percent of cost-burdened households in the region compared with the percent of cost burdened households nationally.

ATTACHMENT 2

HCD REGIONAL HOUSING NEED DETERMINATION:
ABAG June 30, 2021 through December 31, 2030

Methodology

ABAG: PROJECTION PERIOD (8.5 years) HCD Determined Population, Households, & Housing Unit Need		
Reference No.	Step Taken to Calculate Regional Housing Need	Amount
1.	**Population: December 31 2030 (DOF June 30 2030 projection adjusted + 6 months to December 31 2030)**	8,273,975
2.	*- Group Quarters Population: December 31 2030 (DOF June 30 2030 projection adjusted + 6 months to December 31 2030)*	-169,755
3.	**Household (HH) Population**	233,655
4.	**Projected Households**	**3,023,735**
5.	+ Vacancy Adjustment (3.27%)	+98,799
6.	+ Overcrowding Adjustment (3.13%)	+94,605
7.	+ Replacement Adjustment (.50%)	+15,120
8.	*- Occupied Units (HHs) estimated June 30, 2022*	-2,800,185
9.	+ Cost-burden Adjustment	+9,102
Total	**6th Cycle Regional Housing Need Assessment (RHNA)**	**441,176**

Detailed background data for this chart is available upon request.

Explanation and Data Sources

1-4. Population, Group Quarters, Household Population, & Projected Households: Pursuant to Gov. Code Section 65584.01, projections were extrapolated from DOF projections. Population reflects total persons. Group Quarter Population reflects persons in a dormitory, group home, institute, military, etc. that do not require residential housing. Household Population reflects persons requiring residential housing. Projected Households reflect the propensity of persons within the Household Population to form households at different rates based on American Community Survey (ACS) trends.

5. Vacancy Adjustment: HCD applies a vacancy adjustment (standard 5% maximum to total projected housing stock) and adjusts the percentage based on the region's current vacancy percentage to provide healthy market vacancies to facilitate housing availability and resident mobility. The adjustment is the difference between standard 5% vacancy rate and regions current vacancy rate based **(1.73%)** on the 2014-2018 ACS data. For ABAG that difference is **3.27%**.

6. Overcrowding Adjustment: In regions where overcrowding is greater than the comparable region's overcrowding rate, or in the absence of comparable region the national overcrowding rate. HCD applies an adjustment based on the amount the regions overcrowding rate **(6.73%)** exceeds the comparable region's rate **(3.60%)**. For ABAG that difference is **3.13%**. Data is from the 2014-2018 ACS.

(Continued next page)

ATTACHMENT 2

HCD REGIONAL HOUSING NEED DETERMINATION:
ABAG June 30, 2021 through December 31, 2030
(Continued)

7. Replacement Adjustment: HCD applies a replacement adjustment between .5% and 5% to the total housing stock based on the current 10-year annual average percent of demolitions the region's local government annual reports to Department of Finance (DOF). For ABAG the 10-year annual average multiplied by the length of the projection period is .40%, and the minimum **.50%** adjustment is applied.

8. Occupied Units: This figure reflects DOF's estimate of occupied units at the start of the projection period (June 30, 2022).

9. Cost Burden Adjustment: HCD applies an adjustment to the projected need by comparing the difference in cost-burden by income group for the region to the cost-burden by income group for the comparable regions, as determined by ABAG. The very-low and low income RHNA is increased by the percent difference (66.64%-66.00%=.**64%**) between the region and the comparable region cost burden rate for households earning 80% of area median income and below, then this difference is applied to very low- and low-income RHNA proportionate to the share of the population these groups currently represent. The moderate and above-moderate income RHNA is increased by the percent difference (16.25%-13.10%=**3.15%**) between the region and the comparable region cost burden rate for households earning above 80% Area Median Income, then this difference is applied to moderate and above moderate income RHNA proportionate to the share of the population these groups currently represent. Data is from 2012-2016 CHAS.

Overview of Performance Evaluation Metrics

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

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

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

Several of the metrics focus on whether jurisdictions with certain characteristics receive a significant share of their RHNA as lower-income units. These metrics reflect HCD's analysis in its letters evaluating RHNA methodologies from other regions. However, HMC members advocated for metrics that also examine the total number of units assigned to a jurisdiction. These HMC members asserted that it is ultimately less impactful if a jurisdiction receives a high share of its RHNA as lower-income units if that same jurisdiction receives few units overall. Accordingly, each metric that focuses on the share of lower-income units assigned to jurisdictions with certain characteristics is paired with a complementary metric that examines whether those jurisdictions also receive a share of the regional housing need that is at least proportional to their share of the region's households. A value of 1.0 for these complementary metrics means that the group of jurisdictions' overall share of RHNA is proportional relative to its overall share of households in 2020, while a value below 1.0 is less than proportional.

Evaluation of Final RHNA Methodology

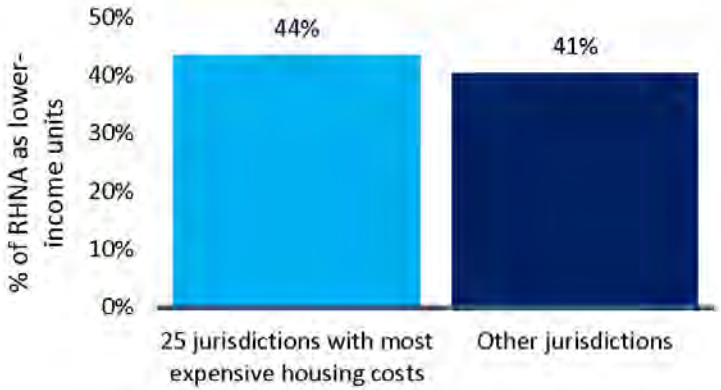
The graphs below show how well the final RHNA methodology performs in achieving the five statutory RHNA objectives based on the evaluation metrics.

1 See California Government Code Section 65584(d).
2 For copies of letters HCD sent to other regions, see this document from the January 2020 HMC meeting agenda packet.

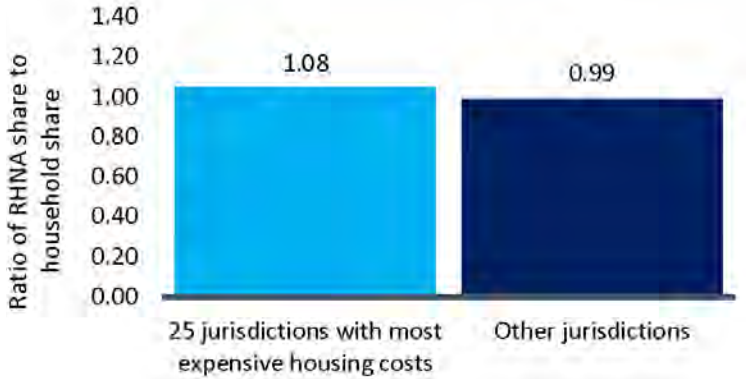
APPENDIX 3

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

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

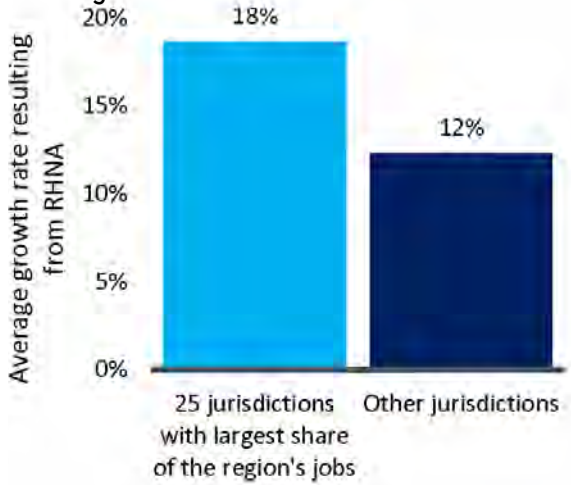


Metric 1a.2: Do jurisdictions with the most expensive housing costs receive a share of the region's housing need that is at least proportional to their share of the region's households?

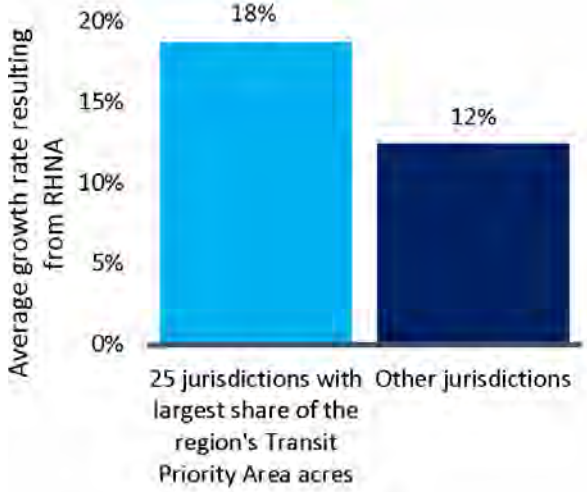


OBJECTIVE 2: Does the allocation promote infill development and socioeconomic equity, the protection of environmental and agricultural resources, the encouragement of efficient development patterns, and the achievement of the region's greenhouse gas reductions targets?

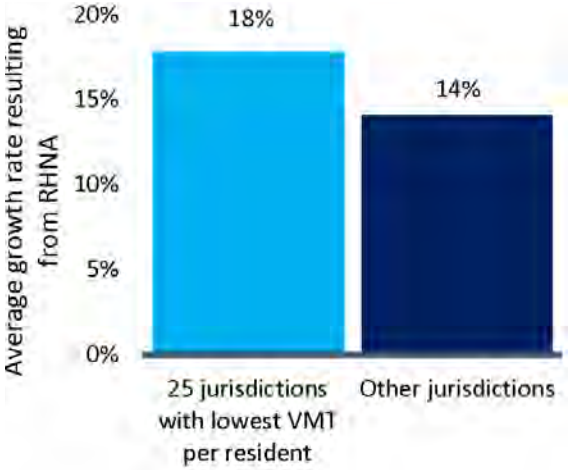
Metr ic 2a: Do jurisdictions with the largest share of the region's jobs have the highest grow th rates resulting from RHNA?



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

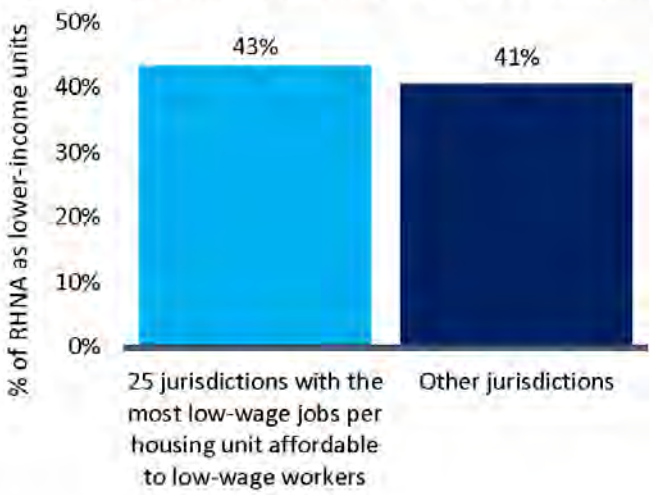


Metric 2c: Do jurisdictions with the lowest vehicle miles traveled (VMT) per resident have the highest growth rates resulting from RHNA?

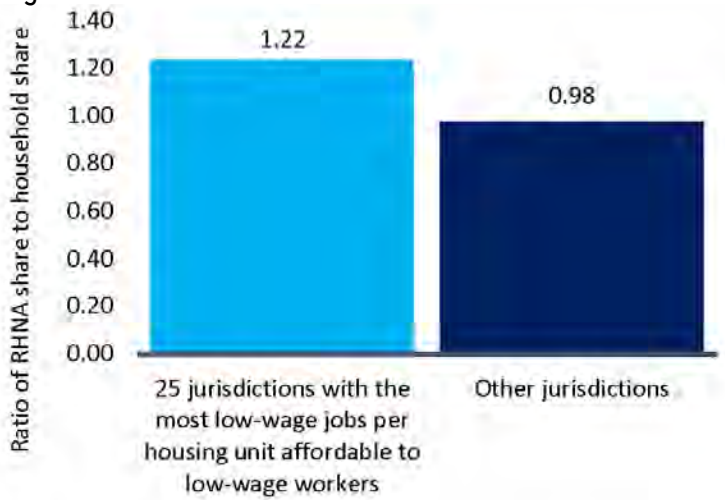


OBJECTIVE 3: Does the allocation promote an improved intraregional relationship between jobs and housing, including an improved balance between the number of low-wage jobs and the number of housing units affordable to low wage workers in each jurisdiction?

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

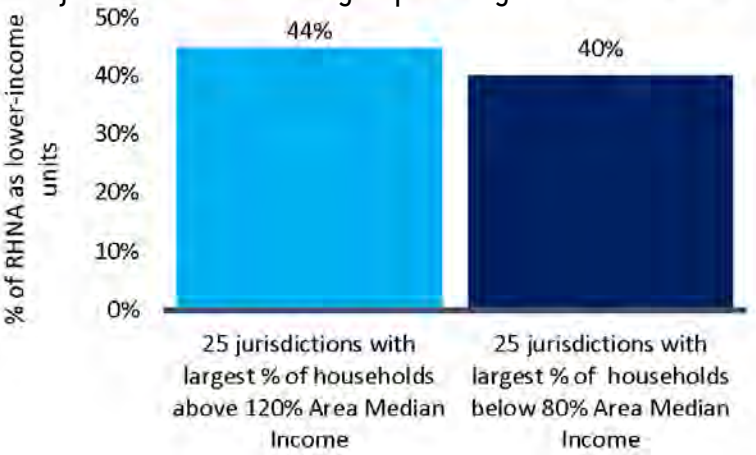


Metric 3a.2: Do jurisdictions with the most low-wage workers per housing unit affordable to low-wage workers receive a share of the region's housing need that is at least proportional to their share of the region's households?



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

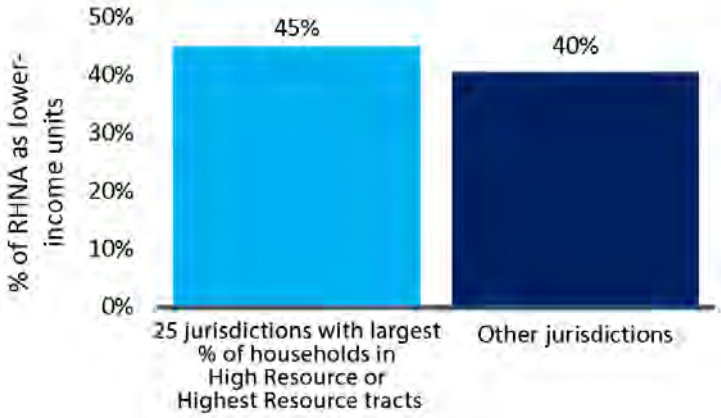
Metric 4: Do jurisdictions with the largest percentage of high-income residents receive a larger share of their RHNA as lower-income units than jurisdictions with the largest percentage of low-income residents?



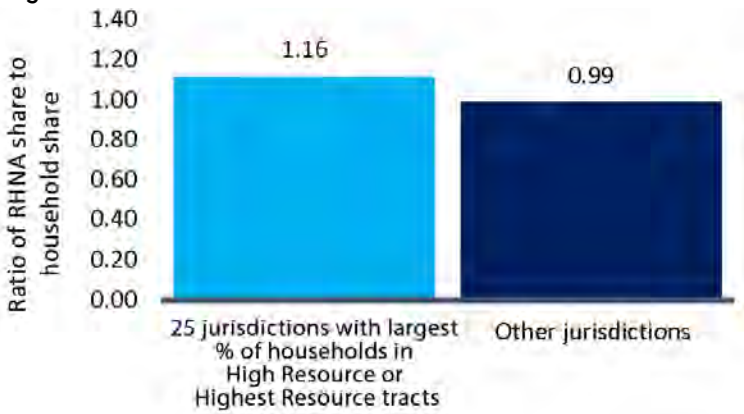
APPENDIX 3

OBJECTIVE 5: Does the allocation affirmatively further fair housing?

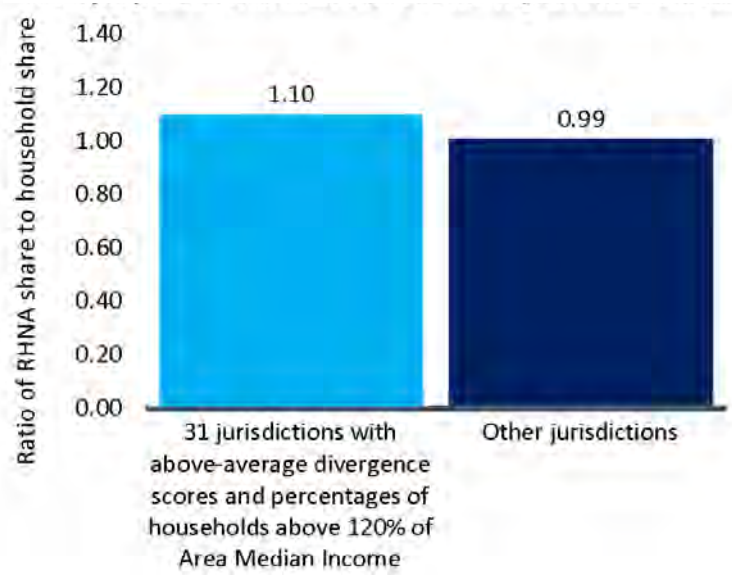
Metric 5a.1: Do jurisdictions with the largest percentage of households living in High or Highest Resource census tracts receive a significant percentage of their RHNA as lower-income units?



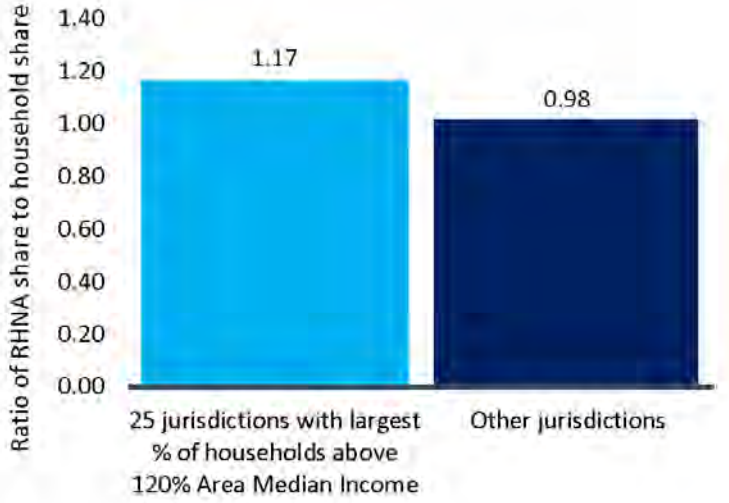
Metric 5a.2: Do jurisdictions with the largest percentage of households living in High or Highest Resource census tracts receive a share of the region's housing need that is at least proportional to their share of the region's households?



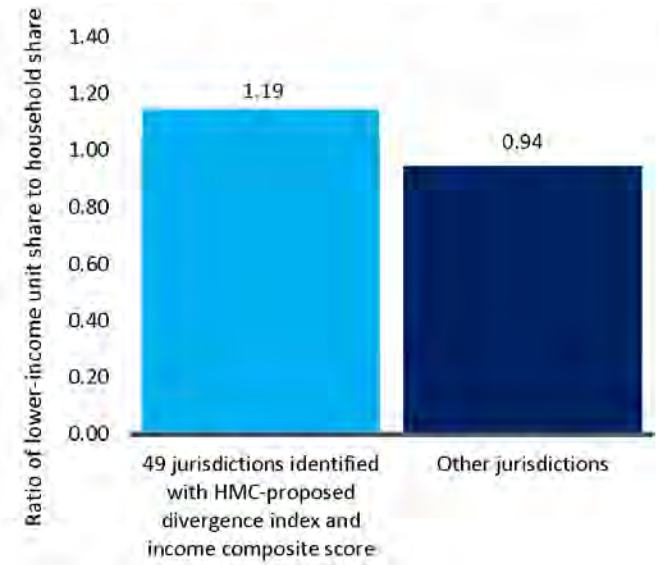
Metric 5b: Do jurisdictions exhibiting racial and economic exclusion receive a share of the region's housing need that is at least proportional to their share of the region's households?



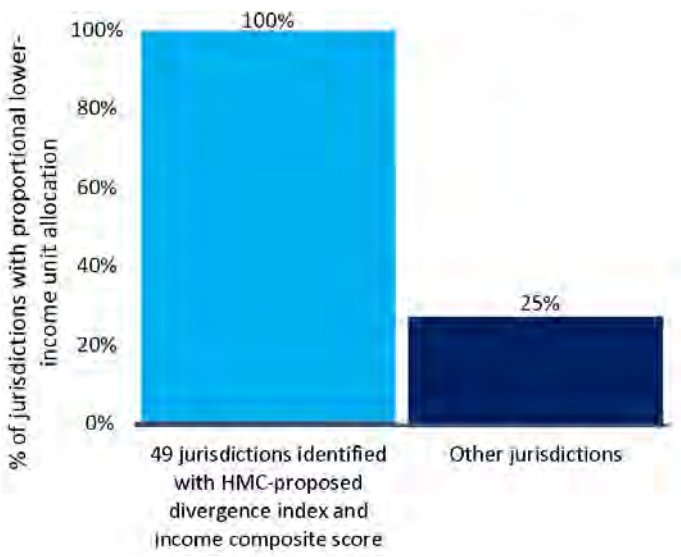
Metric 5c: Do jurisdictions with the largest percentage of high-income residents receive a share of the region's housing need that is at least proportional to their share of the region's households?



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



Metric 5d.2: Do most jurisdictions exhibiting racial and economic exclusion above the regional average receive a share of the region's very low- and low-income housing need that is at least proportional to the jurisdiction's share of the region's households?



Note: These metrics use a composite score to identify jurisdictions that exhibit racial and economic exclusion that is above the regional average based on the jurisdiction's divergence index score and the percent of the jurisdiction's households above 120 percent of Area Median Income (AMI).

APPENDIX 4

Factor Scores by Jurisdiction

Jurisdiction	BASELINE ALLOCATION: Share of Bay Area Households in Year 2050 (A)	FACTOR: ACCESS TO HIGH OPPORTUNITY AREAS (AHOA)				FACTOR: JOB PROXIMITY - AUTO (JPA)				FACTOR: JOB PROXIMITY - TRANSIT (JPT)			
		FACTOR PREPARATION				FACTOR PREPARATION				FACTOR PREPARATION			
		RAW AHOA FACTOR SCORE	AHOA FACTOR SCORE RESCALED TO 0.5-1.5 RANGE (B)	BASELINE ADJUSTED BY AHOA FACTOR (A * B)	FACTOR DISTRIBUTION: ADJUSTED BASELINE RESCALED TO 100% (A * B) / SUM(A * B)	RAW JPA FACTOR SCORE	JPA FACTOR SCORE RESCALED TO 0.5-1.5 RANGE (B)	BASELINE ADJUSTED BY JPA FACTOR (A * B)	FACTOR DISTRIBUTION: ADJUSTED BASELINE RESCALED TO 100% (A * B) / SUM(A * B)	RAW JPT FACTOR SCORE	JPT FACTOR SCORE RESCALED TO 0.5-1.5 RANGE (B)	BASELINE ADJUSTED BY JPT FACTOR (A * B)	FACTOR DISTRIBUTION: ADJUSTED BASELINE RESCALED TO 100% (A * B) / SUM(A * B)
Alameda	1.100%	0.658	1.158	1.274%	1.372%	16.458	1.013	1.114%	1.075%	2.570	0.677	0.744%	0.995%
Albany	0.206%	0.845	1.345	0.278%	0.299%	16.532	1.015	0.210%	0.202%	5.333	0.866	0.179%	0.239%
American Canyon	0.176%	0.000	0.500	0.088%	0.095%	4.492	0.638	0.113%	0.109%	0.000	0.500	0.088%	0.118%
Antioch	1.270%	0.000	0.500	0.635%	0.684%	1.670	0.549	0.698%	0.673%	0.050	0.503	0.639%	0.855%
Atherton	0.072%	0.414	0.914	0.066%	0.071%	21.084	1.158	0.083%	0.080%	1.827	0.625	0.045%	0.060%
Belmont	0.305%	1.000	1.500	0.457%	0.492%	19.019	1.093	0.333%	0.322%	0.754	0.552	0.168%	0.225%
Belvedere	0.032%	1.000	1.500	0.048%	0.052%	3.208	0.597	0.019%	0.019%	0.000	0.500	0.016%	0.022%
Berkeley	1.701%	0.730	1.230	2.093%	2.253%	18.029	1.062	1.807%	1.744%	7.622	1.023	1.741%	2.328%
Brentwood	0.647%	0.000	0.500	0.323%	0.348%	1.290	0.537	0.348%	0.335%	0.000	0.500	0.323%	0.432%
Brisbane	0.423%	0.000	0.500	0.211%	0.228%	26.701	1.334	0.564%	0.544%	0.111	0.508	0.215%	0.287%
Burlingame	0.546%	1.000	1.500	0.820%	0.883%	21.877	1.183	0.646%	0.624%	0.770	0.553	0.302%	0.404%
Calistoga	0.052%	0.000	0.500	0.026%	0.028%	0.499	0.513	0.027%	0.026%	0.000	0.500	0.026%	0.035%
Campbell	0.563%	0.657	1.157	0.652%	0.702%	23.847	1.245	0.701%	0.677%	3.067	0.711	0.400%	0.535%
Clayton	0.111%	1.000	1.500	0.167%	0.179%	6.175	0.690	0.077%	0.074%	0.016	0.501	0.056%	0.074%
Cloverdale	0.120%	0.000	0.500	0.060%	0.065%	0.400	0.509	0.061%	0.059%	0.000	0.500	0.060%	0.080%
Colma	0.052%	0.000	0.500	0.026%	0.028%	25.758	1.304	0.068%	0.066%	5.495	0.877	0.046%	0.062%
Concord	1.725%	0.112	0.612	1.057%	1.138%	6.800	0.710	1.225%	1.182%	0.382	0.526	0.908%	1.214%
Corte Madera	0.138%	1.000	1.500	0.207%	0.223%	7.987	0.747	0.103%	0.100%	0.728	0.550	0.076%	0.102%
Cotati	0.092%	0.000	0.500	0.046%	0.050%	4.449	0.636	0.059%	0.057%	0.001	0.500	0.046%	0.062%
Cupertino	0.724%	1.000	1.500	1.086%	1.169%	27.568	1.361	0.985%	0.951%	0.866	0.559	0.405%	0.541%

APPENDIX 4

Factor Scores by Jurisdiction

Jurisdiction	BASELINE ALLOCATION: Share of Bay Area Households in Year 2050 (A)	FACTOR: ACCESS TO HIGH OPPORTUNITY AREAS (AHOA)				FACTOR: JOB PROXIMITY - AUTO (JPA)				FACTOR: JOB PROXIMITY - TRANSIT (JPT)			
		FACTOR PREPARATION				FACTOR PREPARATION				FACTOR PREPARATION			
		RAW AHOA FACTOR SCORE	AHOA FACTOR SCORE RESCALED TO 0.5-1.5 RANGE (B)	BASELINE ADJUSTED BY AHOA FACTOR (A * B)	FACTOR DISTRIBUTION: ADJUSTED BASELINE RESCALED TO 100% (A * B) / SUM(A * B)	RAW JPA FACTOR SCORE	JPA FACTOR SCORE RESCALED TO 0.5-1.5 RANGE (B)	BASELINE ADJUSTED BY JPA FACTOR (A * B)	FACTOR DISTRIBUTION: ADJUSTED BASELINE RESCALED TO 100% (A * B) / SUM(A * B)	RAW JPT FACTOR SCORE	JPT FACTOR SCORE RESCALED TO 0.5-1.5 RANGE (B)	BASELINE ADJUSTED BY JPT FACTOR (A * B)	FACTOR DISTRIBUTION: ADJUSTED BASELINE RESCALED TO 100% (A * B) / SUM(A * B)
Daly City	0.945%	0.273	0.773	0.730%	0.786%	26.874	1.339	1.266%	1.222%	6.054	0.916	0.865%	1.157%
Danville	0.424%	1.000	1.500	0.636%	0.685%	9.019	0.780	0.330%	0.319%	0.025	0.502	0.213%	0.284%
Dublin	0.705%	1.000	1.500	1.057%	1.139%	8.733	0.771	0.543%	0.524%	0.222	0.515	0.363%	0.486%
East Palo Alto	0.206%	0.000	0.500	0.103%	0.111%	30.667	1.458	0.301%	0.290%	1.896	0.630	0.130%	0.174%
El Cerrito	0.405%	0.110	0.610	0.247%	0.266%	14.763	0.960	0.389%	0.375%	2.914	0.700	0.284%	0.379%
Emeryville	0.493%	0.000	0.500	0.246%	0.265%	19.602	1.111	0.548%	0.528%	13.124	1.401	0.690%	0.923%
Fairfax	0.098%	1.000	1.500	0.148%	0.159%	3.296	0.600	0.059%	0.057%	0.288	0.520	0.051%	0.068%
Foster City	0.327%	1.000	1.500	0.491%	0.529%	18.052	1.063	0.348%	0.336%	0.227	0.516	0.169%	0.226%
Fremont	2.434%	0.920	1.420	3.456%	3.722%	12.595	0.892	2.170%	2.094%	0.516	0.535	1.303%	1.742%
Gilroy	0.461%	0.166	0.666	0.307%	0.331%	1.289	0.537	0.248%	0.239%	0.035	0.502	0.231%	0.310%
Half Moon Bay	0.149%	0.000	0.500	0.074%	0.080%	0.200	0.503	0.075%	0.072%	0.000	0.500	0.074%	0.099%
Hayward	1.571%	0.000	0.500	0.786%	0.846%	11.689	0.863	1.357%	1.309%	0.661	0.545	0.857%	1.146%
Healdsburg	0.121%	0.000	0.500	0.061%	0.065%	3.132	0.595	0.072%	0.070%	0.020	0.501	0.061%	0.081%
Hercules	0.264%	0.000	0.500	0.132%	0.142%	8.488	0.763	0.202%	0.195%	0.450	0.531	0.140%	0.188%
Hillsborough	0.097%	1.000	1.500	0.146%	0.157%	15.669	0.988	0.096%	0.093%	0.019	0.501	0.049%	0.065%
Lafayette	0.382%	1.000	1.500	0.572%	0.616%	13.389	0.917	0.350%	0.338%	0.578	0.540	0.206%	0.275%
Larkspur	0.189%	1.000	1.500	0.284%	0.306%	6.557	0.702	0.133%	0.128%	0.659	0.545	0.103%	0.138%
Livermore	1.269%	0.373	0.873	1.108%	1.193%	4.970	0.653	0.828%	0.799%	0.103	0.507	0.643%	0.860%
Los Altos	0.301%	1.000	1.500	0.451%	0.486%	30.664	1.458	0.438%	0.423%	0.862	0.559	0.168%	0.225%
Los Altos Hills	0.076%	1.000	1.500	0.114%	0.123%	29.816	1.432	0.109%	0.105%	0.000	0.500	0.038%	0.051%

APPENDIX 4

Factor Scores by Jurisdiction

Jurisdiction	BASELINE ALLOCATION: Share of Bay Area Households in Year 2050 (A)	FACTOR: ACCESS TO HIGH OPPORTUNITY AREAS (AHOA)				FACTOR: JOB PROXIMITY - AUTO (JPA)				FACTOR: JOB PROXIMITY - TRANSIT (JPT)			
		FACTOR PREPARATION				FACTOR PREPARATION				FACTOR PREPARATION			
		RAW AHOA FACTOR SCORE	AHOA FACTOR SCORE RESCALED TO 0.5-1.5 RANGE (B)	BASELINE ADJUSTED BY AHOA FACTOR (A * B)	FACTOR DISTRIBUTION: ADJUSTED BASELINE RESCALED TO 100% (A * B) / SUM(A * B)	RAW JPA FACTOR SCORE	JPA FACTOR SCORE RESCALED TO 0.5-1.5 RANGE (B)	BASELINE ADJUSTED BY JPA FACTOR (A * B)	FACTOR DISTRIBUTION: ADJUSTED BASELINE RESCALED TO 100% (A * B) / SUM(A * B)	RAW JPT FACTOR SCORE	JPT FACTOR SCORE RESCALED TO 0.5-1.5 RANGE (B)	BASELINE ADJUSTED BY JPT FACTOR (A * B)	FACTOR DISTRIBUTION: ADJUSTED BASELINE RESCALED TO 100% (A * B) / SUM(A * B)
Los Gatos	0.335%	1.000	1.500	0.503%	0.542%	20.659	1.145	0.384%	0.371%	0.120	0.508	0.170%	0.228%
Martinez	0.383%	0.298	0.798	0.306%	0.329%	8.951	0.778	0.298%	0.288%	0.149	0.510	0.196%	0.262%
Menlo Park	0.481%	0.848	1.348	0.648%	0.697%	30.389	1.450	0.697%	0.672%	1.426	0.598	0.287%	0.384%
Mill Valley	0.164%	1.000	1.500	0.246%	0.265%	6.629	0.705	0.116%	0.112%	0.268	0.518	0.085%	0.114%
Millbrae	0.350%	1.000	1.500	0.526%	0.566%	26.434	1.326	0.465%	0.448%	0.810	0.556	0.195%	0.260%
Milpitas	1.257%	0.623	1.123	1.412%	1.520%	25.695	1.302	1.637%	1.580%	2.588	0.678	0.852%	1.139%
Monte Sereno	0.032%	1.000	1.500	0.048%	0.051%	21.405	1.168	0.037%	0.036%	0.007	0.500	0.016%	0.021%
Moraga	0.204%	1.000	1.500	0.306%	0.330%	12.396	0.886	0.181%	0.174%	0.267	0.518	0.106%	0.141%
Morgan Hill	0.410%	0.000	0.500	0.205%	0.221%	4.420	0.635	0.261%	0.252%	0.153	0.511	0.209%	0.280%
Mountain View	1.754%	0.925	1.425	2.499%	2.690%	31.814	1.494	2.621%	2.529%	1.737	0.619	1.086%	1.452%
Napa	0.769%	0.028	0.528	0.406%	0.437%	3.017	0.591	0.455%	0.439%	0.243	0.517	0.397%	0.531%
Newark	0.609%	0.114	0.614	0.374%	0.402%	9.202	0.785	0.478%	0.461%	0.393	0.527	0.321%	0.429%
Novato	0.672%	0.252	0.752	0.505%	0.544%	3.815	0.616	0.414%	0.400%	0.058	0.504	0.339%	0.453%
Oakland	6.338%	0.243	0.743	4.708%	5.069%	19.810	1.118	7.086%	6.838%	7.035	0.983	6.231%	8.332%
Oakley	0.450%	0.000	0.500	0.225%	0.242%	1.361	0.540	0.243%	0.234%	0.000	0.500	0.225%	0.301%
Orinda	0.235%	1.000	1.500	0.352%	0.379%	18.135	1.065	0.250%	0.241%	0.069	0.505	0.118%	0.158%
Pacifica	0.356%	1.000	1.500	0.534%	0.575%	10.511	0.826	0.294%	0.284%	0.108	0.507	0.181%	0.242%
Palo Alto	0.935%	1.000	1.500	1.402%	1.510%	30.656	1.458	1.363%	1.315%	0.937	0.564	0.527%	0.705%
Petaluma	0.716%	0.077	0.577	0.413%	0.445%	3.584	0.609	0.437%	0.421%	0.047	0.503	0.361%	0.482%
Piedmont	0.098%	1.000	1.500	0.146%	0.158%	19.883	1.120	0.109%	0.105%	4.836	0.832	0.081%	0.109%

APPENDIX 4

Factor Scores by Jurisdiction

Jurisdiction	BASELINE ALLOCATION: Share of Bay Area Households in Year 2050 (A)	FACTOR: ACCESS TO HIGH OPPORTUNITY AREAS (AHOA)				FACTOR: JOB PROXIMITY - AUTO (JPA)				FACTOR: JOB PROXIMITY - TRANSIT (JPT)			
		FACTOR PREPARATION				FACTOR PREPARATION				FACTOR PREPARATION			
		RAW AHOA FACTOR SCORE	AHOA FACTOR SCORE RESCALED TO 0.5-1.5 RANGE (B)	BASELINE ADJUSTED BY AHOA FACTOR (A * B)	FACTOR DISTRIBUTION: ADJUSTED BASELINE RESCALED TO 100% (A * B) / SUM(A * B)	RAW JPA FACTOR SCORE	JPA FACTOR SCORE RESCALED TO 0.5-1.5 RANGE (B)	BASELINE ADJUSTED BY JPA FACTOR (A * B)	FACTOR DISTRIBUTION: ADJUSTED BASELINE RESCALED TO 100% (A * B) / SUM(A * B)	RAW JPT FACTOR SCORE	JPT FACTOR SCORE RESCALED TO 0.5-1.5 RANGE (B)	BASELINE ADJUSTED BY JPT FACTOR (A * B)	FACTOR DISTRIBUTION: ADJUSTED BASELINE RESCALED TO 100% (A * B) / SUM(A * B)
Pinole	0.183%	0.000	0.500	0.091%	0.098%	8.067	0.750	0.137%	0.132%	0.414	0.528	0.096%	0.129%
Pittsburg	0.787%	0.000	0.500	0.393%	0.423%	5.046	0.655	0.515%	0.497%	0.330	0.523	0.411%	0.550%
Pleasant Hill	0.368%	0.636	1.136	0.418%	0.450%	9.503	0.795	0.292%	0.282%	0.189	0.513	0.189%	0.252%
Pleasanton	1.135%	1.000	1.500	1.703%	1.833%	8.215	0.754	0.856%	0.826%	0.507	0.535	0.607%	0.812%
Portola Valley	0.045%	1.000	1.500	0.067%	0.072%	13.912	0.933	0.042%	0.040%	0.000	0.500	0.022%	0.030%
Redwood City	0.984%	0.473	0.973	0.958%	1.032%	21.781	1.180	1.161%	1.121%	0.668	0.546	0.537%	0.719%
Richmond	1.227%	0.000	0.500	0.614%	0.661%	11.673	0.863	1.059%	1.022%	0.764	0.552	0.678%	0.907%
Rohnert Park	0.625%	0.000	0.500	0.312%	0.336%	4.447	0.636	0.398%	0.384%	0.070	0.505	0.315%	0.422%
Ross	0.022%	1.000	1.500	0.032%	0.035%	4.210	0.629	0.014%	0.013%	0.592	0.541	0.012%	0.016%
San Anselmo	0.167%	1.000	1.500	0.250%	0.270%	3.554	0.608	0.102%	0.098%	0.229	0.516	0.086%	0.115%
San Bruno	0.730%	0.244	0.744	0.543%	0.585%	25.955	1.311	0.957%	0.924%	0.798	0.555	0.405%	0.542%
San Carlos	0.455%	1.000	1.500	0.683%	0.735%	21.435	1.169	0.532%	0.514%	1.310	0.590	0.269%	0.359%
San Francisco	14.304%	0.544	1.044	14.936%	16.082%	31.995	1.500	21.455%	20.705%	14.561	1.500	21.455%	28.689%
San Jose	14.426%	0.347	0.847	12.212%	13.149%	20.319	1.134	16.358%	15.786%	2.396	0.665	9.587%	12.819%
San Leandro	1.137%	0.000	0.500	0.569%	0.612%	18.689	1.083	1.231%	1.188%	3.221	0.721	0.820%	1.097%
San Mateo	1.419%	0.611	1.111	1.576%	1.697%	20.527	1.140	1.618%	1.562%	1.250	0.586	0.831%	1.112%
San Pablo	0.248%	0.000	0.500	0.124%	0.134%	12.425	0.886	0.220%	0.212%	1.304	0.590	0.146%	0.196%
San Rafael	1.048%	0.211	0.711	0.745%	0.803%	4.974	0.653	0.684%	0.661%	0.016	0.501	0.525%	0.703%
San Ramon	0.975%	1.000	1.500	1.462%	1.574%	8.182	0.753	0.734%	0.709%	0.159	0.511	0.498%	0.666%
Santa Clara	2.135%	0.639	1.139	2.431%	2.618%	27.441	1.357	2.898%	2.796%	3.493	0.740	1.580%	2.112%
Santa Rosa	1.745%	0.067	0.567	0.990%	1.066%	4.165	0.627	1.095%	1.057%	0.416	0.529	0.922%	1.234%

APPENDIX 4

Factor Scores by Jurisdiction

Jurisdiction	BASELINE ALLOCATION: Share of Bay Area Households in Year 2050 (A)	FACTOR: ACCESS TO HIGH OPPORTUNITY AREAS (AHOA)				FACTOR: JOB PROXIMITY - AUTO (JPA)				FACTOR: JOB PROXIMITY - TRANSIT (JPT)			
		FACTOR PREPARATION			FACTOR DISTRIBUTION: ADJUSTED BASELINE RESCALED TO 100% (A * B) / SUM(A * B)	FACTOR PREPARATION			FACTOR DISTRIBUTION: ADJUSTED BASELINE RESCALED TO 100% (A * B) / SUM(A * B)	FACTOR PREPARATION			FACTOR DISTRIBUTION: ADJUSTED BASELINE RESCALED TO 100% (A * B) / SUM(A * B)
		RAW AHOA FACTOR SCORE	AHOA FACTOR SCORE RESCALED TO 0.5-1.5 RANGE (B)	BASELINE ADJUSTED BY AHOA FACTOR (A * B)		RAW JPA FACTOR SCORE	JPA FACTOR SCORE RESCALED TO 0.5-1.5 RANGE (B)	BASELINE ADJUSTED BY JPA FACTOR (A * B)		RAW JPT FACTOR SCORE	JPT FACTOR SCORE RESCALED TO 0.5-1.5 RANGE (B)	BASELINE ADJUSTED BY JPT FACTOR (A * B)	
Saratoga	0.280%	1.000	1.500	0.420%	0.453%	23.686	1.239	0.347%	0.335%	0.193	0.513	0.144%	0.192%
Sausalito	0.125%	1.000	1.500	0.187%	0.202%	17.729	1.053	0.132%	0.127%	0.683	0.547	0.068%	0.091%
Sebastopol	0.086%	0.000	0.500	0.043%	0.046%	3.671	0.612	0.053%	0.051%	0.000	0.500	0.043%	0.057%
Sonoma	0.133%	0.000	0.500	0.067%	0.072%	0.838	0.523	0.070%	0.067%	0.000	0.500	0.067%	0.089%
South San Francisco	0.929%	0.208	0.708	0.658%	0.709%	26.058	1.314	1.221%	1.178%	1.079	0.574	0.534%	0.713%
St. Helena	0.068%	0.000	0.500	0.034%	0.036%	1.078	0.531	0.036%	0.035%	0.000	0.500	0.034%	0.045%
Sunnyvale	2.088%	0.702	1.202	2.510%	2.703%	29.357	1.417	2.959%	2.855%	2.221	0.653	1.362%	1.822%
Tiburon	0.126%	1.000	1.500	0.190%	0.204%	4.756	0.646	0.082%	0.079%	0.027	0.502	0.063%	0.085%
Unincorporated Alameda	1.419%	0.279	0.779	1.106%	1.191%	6.426	0.698	0.991%	0.957%	0.025	0.502	0.712%	0.952%
Unincorporated Contra Costa	2.203%	0.359	0.859	1.893%	2.038%	5.598	0.672	1.481%	1.429%	0.012	0.501	1.103%	1.475%
Unincorporated Marin	0.822%	0.761	1.261	1.036%	1.116%	1.379	0.540	0.444%	0.428%	0.017	0.501	0.412%	0.551%
Unincorporated Napa	0.279%	0.132	0.632	0.176%	0.190%	1.882	0.556	0.155%	0.150%	0.003	0.500	0.140%	0.187%
Unincorporated San Mateo	0.809%	0.447	0.947	0.766%	0.825%	2.242	0.567	0.459%	0.443%	0.043	0.503	0.407%	0.544%
Unincorporated Santa Clara	0.815%	0.420	0.920	0.750%	0.807%	9.501	0.795	0.647%	0.625%	0.068	0.505	0.411%	0.550%
Unincorporated Sonoma	1.540%	0.059	0.559	0.860%	0.926%	1.752	0.552	0.850%	0.820%	0.013	0.501	0.771%	1.031%
Union City	0.727%	0.126	0.626	0.455%	0.490%	9.138	0.783	0.569%	0.549%	1.094	0.575	0.418%	0.559%
Walnut Creek	1.148%	0.922	1.422	1.632%	1.757%	9.192	0.785	0.901%	0.870%	0.386	0.527	0.604%	0.808%
Windsor	0.260%	0.000	0.500	0.130%	0.140%	3.758	0.615	0.160%	0.154%	0.000	0.500	0.130%	0.174%
Woodside	0.058%	0.981	1.481	0.085%	0.092%	17.348	1.041	0.060%	0.058%	0.036	0.502	0.029%	0.039%
Yountville	0.029%	0.000	0.500	0.015%	0.016%	1.820	0.554	0.016%	0.016%	0.080	0.506	0.015%	0.020%
REGION TOTAL				**92.873%**	**100.000%**			**103.624%**	**100.000%**			**74.786%**	**100.000%**

APPENDIX 5

Final RHNA Allocation by Jurisdiction, with Factor Components

	FACTOR DISTRIBUTIONS			ALLOCATION BUILDING BLOCKS (Weights determine the share of each income group's units that is assigned to a factor, and the factor is used to geographically allocate those units)																		
	(Each sums to 100%)			VERY LOW INCOME						LOW INCOME						MODERATE INCOME				ABOVE MODERATE INCOME				
Factor	ACCESS TO HIGH OPPORTUNITY AREAS	JOB PROXIMITY – AUTO	JOB PROXIMITY – TRANSIT	ACCESS TO HIGH OPPORTUNITY AREAS	JOB PROXIMITY – AUTO	JOB PROXIMITY – TRANSIT	SUBTOTAL	EQUITY ADJUSTMENT	RHNA APPEALS	ACCESS TO HIGH OPPORTUNITY AREAS	JOB PROXIMITY – AUTO	JOB PROXIMITY – TRANSIT	SUBTOTAL	EQUITY ADJUSTMENT	RHNA APPEALS	ACCESS TO HIGH OPPORTUNITY AREAS	JOB PROXIMITY – AUTO	SUBTOTAL	RHNA APPEALS	ACCESS TO HIGH OPPORTUNITY AREAS	JOB PROXIMITY – AUTO	SUBTOTAL	RHNA APPEALS	
Factor Weight				70%	15%	15%	100%			70%	15%	15%	100%			40%	60%	100%		40%	60%	100%		TOTAL
Jurisdiction	**100%**	**100%**	**100%**	**80,109**	**17,166**	**17,166**	**114,442**			**46,124**	**9,884**	**9,884**	**65,892**			**29,085**	**43,627**	**72,712**		**75,252**	**112,878**	**188,130**		**441,176**
Alameda	1.372%	1.075%	0.995%	1,099	185	171	1,455	-34	-	633	106	98	837	-19	-	399	469	868	-	1,032	1,214	2,246	-	5,353
Albany	0.299%	0.202%	0.239%	239	35	41	315	-7	-	138	20	24	182	-4	-	87	88	175	-	225	228	453	-	1,114
American Canyon	0.095%	0.109%	0.118%	76	19	20	115	-3	-	44	11	12	67	-2	-	28	47	75	-	71	123	194	-	446
Antioch	0.684%	0.673%	0.855%	548	116	147	811	-19	-	315	67	85	467	-11	-	199	294	493	-	515	760	1,275	-	3,016
Atherton	0.071%	0.080%	0.060%	57	14	10	81	13	-	33	8	6	47	7	-	21	35	56	-	53	91	144	-	348
Belmont	0.492%	0.322%	0.225%	394	55	39	488	0	-	227	32	22	281	0	-	143	140	283	-	370	363	733	-	1,785
Belvedere	0.052%	0.019%	0.022%	42	3	4	49	0	-	24	2	2	28	0	-	15	8	23	-	39	21	60	-	160
Berkeley	2.253%	1.744%	2.328%	1,805	299	400	2,504	-58	-	1,039	172	230	1,441	-33	-	655	761	1,416	-	1,696	1,968	3,664	-	8,934
Brentwood	0.348%	0.335%	0.432%	279	58	74	411	-9	-	161	33	43	237	-5	-	101	146	247	-	262	379	641	-	1,522
Brisbane	0.228%	0.544%	0.287%	182	93	49	324	-7	-	105	54	28	187	-4	-	66	237	303	-	171	614	785	-	1,588
Burlingame	0.883%	0.624%	0.404%	707	107	69	883	-20	-	407	62	40	509	-12	-	257	272	529	-	664	704	1,368	-	3,257
Calistoga	0.028%	0.026%	0.035%	22	4	6	32	-1	-	13	3	3	19	0	-	8	11	19	-	21	29	50	-	119
Campbell	0.702%	0.677%	0.535%	562	116	92	770	-18	-	324	67	53	444	-10	-	204	295	499	-	528	764	1,292	-	2,977
Clayton	0.179%	0.074%	0.074%	144	13	13	170	0	-	83	7	7	97	0	-	52	32	84	-	135	84	219	-	570
Cloverdale	0.065%	0.059%	0.080%	52	10	14	76	-2	-	30	6	8	44	-1	-	19	26	45	-	49	67	116	-	278
Colma	0.028%	0.066%	0.062%	23	11	11	45	-1	-	13	7	6	26	-1	-	8	29	37	-	21	75	96	-	202
Concord	1.138%	1.182%	1.214%	911	203	208	1,322	-30	-	525	117	120	762	-18	-	331	516	847	-	856	1,334	2,190	-	5,073
Corte Madera	0.223%	0.100%	0.102%	179	17	17	213	0	-	103	10	10	123	0	-	65	43	108	-	168	113	281	-	725
Cotati	0.050%	0.057%	0.062%	40	10	11	61	-1	-	23	6	6	35	-1	-	14	25	39	-	37	64	101	-	234
Cupertino	1.169%	0.951%	0.541%	937	163	93	1,193	0	-	539	94	54	687	0	-	340	415	755	-	880	1,073	1,953	-	4,588

APPENDIX 5

Final RHNA Allocation by Jurisdiction, with Factor Components

	FACTOR DISTRIBUTIONS			ALLOCATION BUILDING BLOCKS (Weights determine the share of each income group's units that is assigned to a factor, and the factor is used to geographically allocate those units)																		
	(Each sums to 100%)			VERY LOW INCOME						LOW INCOME						MODERATE INCOME				ABOVE MODERATE INCOME				
Factor	ACCESS TO HIGH OPPORTUNITY AREAS	JOB PROXIMITY – AUTO	JOB PROXIMITY – TRANSIT	ACCESS TO HIGH OPPORTUNITY AREAS	JOB PROXIMITY – AUTO	JOB PROXIMITY – TRANSIT	SUBTOTAL	EQUITY ADJUSTMENT	RHNA APPEALS	ACCESS TO HIGH OPPORTUNITY AREAS	JOB PROXIMITY – AUTO	JOB PROXIMITY – TRANSIT	SUBTOTAL	EQUITY ADJUSTMENT	RHNA APPEALS	ACCESS TO HIGH OPPORTUNITY AREAS	JOB PROXIMITY – AUTO	SUBTOTAL	RHNA APPEALS	ACCESS TO HIGH OPPORTUNITY AREAS	JOB PROXIMITY – AUTO	SUBTOTAL	RHNA APPEALS	
Factor Weight				**70%**	**15%**	**15%**	**100%**			**70%**	**15%**	**15%**	**100%**			**40%**	**60%**	**100%**		**40%**	**60%**	**100%**		**TOTAL**
Jurisdiction	**100%**	**100%**	**100%**	**80,109**	**17,166**	**17,166**	**114,442**			**46,124**	**9,884**	**9,884**	**65,892**			**29,085**	**43,627**	**72,712**		**75,252**	**112,878**	**188,130**		**441,176**
Daly City	0.786%	1.222%	1.157%	630	210	199	1,039	297	-	363	121	114	598	171	-	229	533	762	-	592	1,379	1,971	-	4,838
Danville	0.685%	0.319%	0.284%	548	55	49	652	0	-	316	32	28	376	0	-	199	139	338	-	515	360	875	-	2,241
Dublin	1.139%	0.524%	0.486%	912	90	83	1,085	0	-	525	52	48	625	0	-	331	229	560	-	857	592	1,449	-	3,719
East Palo Alto	0.111%	0.290%	0.174%	89	50	30	169	-4	-	51	29	17	97	-2	-	32	127	159	-	83	327	410	-	829
El Cerrito	0.266%	0.375%	0.379%	213	64	65	342	-8	-	123	37	37	197	-5	-	77	164	241	-	200	424	624	-	1,391
Emeryville	0.265%	0.528%	0.923%	213	91	158	462	-11	-	122	52	91	265	-6	-	77	231	308	-	200	597	797	-	1,815
Fairfax	0.159%	0.057%	0.068%	127	10	12	149	0	-	73	6	7	86	0	-	46	25	71	-	120	64	184	-	490
Foster City	0.529%	0.336%	0.226%	423	58	39	520	0	-	244	33	22	299	0	-	154	146	300	-	398	379	777	-	1,896
Fremont	3.722%	2.094%	1.742%	2,981	360	299	3,640	0	-	1,717	207	172	2,096	0	-	1,082	914	1,996	-	2,801	2,364	5,165	-	12,897
Gilroy	0.331%	0.239%	0.310%	265	41	53	359	310	-	152	24	31	207	178	-	96	104	200	-	249	270	519	-	1,773
Half Moon Bay	0.080%	0.072%	0.099%	64	12	17	93	88	-	37	7	10	54	50	-	23	31	54	-	60	81	141	-	480
Hayward	0.846%	1.309%	1.146%	678	225	197	1,100	-25	-	390	129	113	632	-15	-	246	571	817	-	637	1,478	2,115	-	4,624
Healdsburg	0.065%	0.070%	0.081%	52	12	14	78	112	-	30	7	8	45	64	-	19	30	49	-	49	79	128	-	476
Hercules	0.142%	0.195%	0.188%	114	33	32	179	165	-	66	19	19	104	94	-	41	85	126	-	107	220	327	-	995
Hillsborough	0.157%	0.093%	0.065%	126	16	11	153	2	-	73	9	6	88	1	-	46	41	87	-	118	105	223	-	554
Lafayette	0.616%	0.338%	0.275%	494	58	47	599	0	-	284	33	27	344	0	-	179	147	326	-	464	381	845	-	2,114
Larkspur	0.306%	0.128%	0.138%	245	22	24	291	0	-	141	13	14	168	0	-	89	56	145	-	230	145	375	-	979
Livermore	1.193%	0.799%	0.860%	955	137	148	1,240	77	-	550	79	85	714	44	-	347	349	696	-	897	902	1,799	-	4,570
Los Altos	0.486%	0.423%	0.225%	389	73	39	501	0	-	224	42	22	288	0	-	141	185	326	-	365	478	843	-	1,958
Los Altos Hills	0.123%	0.105%	0.051%	98	18	9	125	0	-	57	10	5	72	0	-	36	46	82	-	92	118	210	-	489

APPENDIX 5

Final RHNA Allocation by Jurisdiction, with Factor Components

	FACTOR DISTRIBUTIONS			ALLOCATION BUILDING BLOCKS (Weights determine the share of each income group's units that is assigned to a factor, and the factor is used to geographically allocate those units)																		
	(Each sums to 100%)			VERY LOW INCOME						LOW INCOME						MODERATE INCOME				ABOVE MODERATE INCOME				
Factor	ACCESS TO HIGH OPPORTUNITY AREAS	JOB PROXIMITY – AUTO	JOB PROXIMITY – TRANSIT	ACCESS TO HIGH OPPORTUNITY AREAS	JOB PROXIMITY – AUTO	JOB PROXIMITY – TRANSIT	SUBTOTAL	EQUITY ADJUSTMENT	RHNA APPEALS	ACCESS TO HIGH OPPORTUNITY AREAS	JOB PROXIMITY – AUTO	JOB PROXIMITY – TRANSIT	SUBTOTAL	EQUITY ADJUSTMENT	RHNA APPEALS	ACCESS TO HIGH OPPORTUNITY AREAS	JOB PROXIMITY – AUTO	SUBTOTAL	RHNA APPEALS	ACCESS TO HIGH OPPORTUNITY AREAS	JOB PROXIMITY – AUTO	SUBTOTAL	RHNA APPEALS	
Factor Weight				**70%**	**15%**	**15%**	**100%**			**70%**	**15%**	**15%**	**100%**			**40%**	**60%**	**100%**		**40%**	**60%**	**100%**		**TOTAL**
Jurisdiction	**100%**	**100%**	**100%**	**80,109**	**17,166**	**17,166**	**114,442**			**46,124**	**9,884**	**9,884**	**65,892**			**29,085**	**43,627**	**72,712**		**75,252**	**112,878**	**188,130**		**441,176**
Los Gatos	0.542%	0.371%	0.228%	434	64	39	537	0	-	250	37	23	310	0	-	158	162	320	-	408	418	826	-	1,993
Martinez	0.329%	0.288%	0.262%	264	49	45	358	-8	-	152	28	26	206	-5	-	96	125	221	-	248	325	573	-	1,345
Menlo Park	0.697%	0.672%	0.384%	559	115	66	740	0	-	322	66	38	426	0	-	203	293	496	-	525	759	1,284	-	2,946
Mill Valley	0.265%	0.112%	0.114%	213	19	20	252	10	-	122	11	11	144	7	-	77	49	126	-	200	126	326	-	865
Millbrae	0.566%	0.448%	0.260%	453	77	45	575	0	-	261	44	26	331	0	-	165	196	361	-	426	506	932	-	2,199
Milpitas	1.520%	1.580%	1.139%	1,218	271	196	1,685	0	-	701	156	113	970	0	-	442	689	1,131	-	1,144	1,783	2,927	-	6,713
Monte Sereno	0.051%	0.036%	0.021%	41	6	4	51	2	-	24	4	2	30	0	-	15	16	31	-	39	40	79	-	193
Moraga	0.330%	0.174%	0.141%	264	30	24	318	0	-	152	17	14	183	0	-	96	76	172	-	248	197	445	-	1,118
Morgan Hill	0.221%	0.252%	0.280%	177	43	48	268	-6	-	102	25	28	155	-4	-	64	110	174	-	166	284	450	-	1,037
Mountain View	2.690%	2.529%	1.452%	2,155	434	249	2,838	-65	-	1,241	250	144	1,635	-38	-	782	1,103	1,885	-	2,025	2,855	4,880	-	11,135
Napa	0.437%	0.439%	0.531%	350	75	91	516	-12	-	202	43	53	298	-7	-	127	192	319	-	329	496	825	-	1,939
Newark	0.402%	0.461%	0.429%	322	79	74	475	-11	-	186	46	42	274	-6	-	117	201	318	-	303	521	824	-	1,874
Novato	0.544%	0.400%	0.453%	436	69	78	583	-13	-	251	40	45	336	-8	-	158	174	332	-	409	451	860	-	2,090
Oakland	5.069%	6.838%	8.332%	4,061	1,174	1,430	6,665	-154	-	2,338	676	824	3,838	-88	-	1,474	2,983	4,457	-	3,814	7,719	11,533	-	26,251
Oakley	0.242%	0.234%	0.301%	194	40	52	286	-7	-	112	23	30	165	-4	-	70	102	172	-	182	264	446	-	1,058
Orinda	0.379%	0.241%	0.158%	304	41	27	372	0	-	175	24	16	215	0	-	110	105	215	-	285	272	557	-	1,359
Pacifica	0.575%	0.284%	0.242%	461	49	41	551	-13	-	265	28	24	317	-7	-	167	124	291	-	433	320	753	-	1,892
Palo Alto	1.510%	1.315%	0.705%	1,209	226	121	1,556	0	-	696	130	70	896	0	-	439	574	1,013	-	1,136	1,485	2,621	-	6,086
Petaluma	0.445%	0.421%	0.482%	356	72	83	511	-12	-	205	42	48	295	-7	-	129	184	313	-	335	475	810	-	1,910
Piedmont	0.158%	0.105%	0.109%	126	18	19	163	0		73	10	11	94	0	-	46	46	92	-	119	119	238	-	587

APPENDIX 5

Final RHNA Allocation by Jurisdiction, with Factor Components

	FACTOR DISTRIBUTIONS			ALLOCATION BUILDING BLOCKS (Weights determine the share of each income group's units that is assigned to a factor, and the factor is used to geographically allocate those units)																		
	(Each sums to 100%)			VERY LOW INCOME						LOW INCOME						MODERATE INCOME				ABOVE MODERATE INCOME				
Factor	ACCESS TO HIGH OPPORTUNITY AREAS	JOB PROXIMITY – AUTO	JOB PROXIMITY – TRANSIT	ACCESS TO HIGH OPPORTUNITY AREAS	JOB PROXIMITY – AUTO	JOB PROXIMITY – TRANSIT	SUBTOTAL	EQUITY ADJUSTMENT	RHNA APPEALS	ACCESS TO HIGH OPPORTUNITY AREAS	JOB PROXIMITY – AUTO	JOB PROXIMITY – TRANSIT	SUBTOTAL	EQUITY ADJUSTMENT	RHNA APPEALS	ACCESS TO HIGH OPPORTUNITY AREAS	JOB PROXIMITY – AUTO	SUBTOTAL	RHNA APPEALS	ACCESS TO HIGH OPPORTUNITY AREAS	JOB PROXIMITY – AUTO	SUBTOTAL	RHNA APPEALS	
Factor Weight				70%	15%	15%	100%			70%	15%	15%	100%			40%	60%	100%		40%	60%	100%		TOTAL
Jurisdiction	**100%**	**100%**	**100%**	**80,109**	**17,166**	**17,166**	**114,442**			**46,124**	**9,884**	**9,884**	**65,892**			**29,085**	**43,627**	**72,712**		**75,252**	**112,878**	**188,130**		**441,176**
Pinole	0.098%	0.132%	0.129%	79	23	22	124	-3	-	45	13	13	71	-2	-	29	58	87	-	74	149	223	-	500
Pittsburg	0.423%	0.497%	0.550%	339	85	94	518	-12	10	195	49	54	298	-7	5	123	217	340	6	319	561	880	14	2,052
Pleasant Hill	0.450%	0.282%	0.252%	360	48	43	451	115	-	208	28	25	261	65	-	131	123	254	-	339	318	657	-	1,803
Pleasanton	1.833%	0.826%	0.812%	1,469	142	139	1,750	0	-	846	82	80	1,008	0	-	533	361	894	-	1,380	933	2,313	-	5,965
Portola Valley	0.072%	0.040%	0.030%	58	7	5	70	3	-	33	4	3	40	2	-	21	18	39	-	54	45	99	-	253
Redwood City	1.032%	1.121%	0.719%	826	192	123	1,141	-26	-	476	111	71	658	-15	-	300	489	789	-	776	1,265	2,041	-	4,588
Richmond	0.661%	1.022%	0.907%	529	175	156	860	-20	-	305	101	90	496	-11	-	192	446	638	-	497	1,154	1,651	-	3,614
Rohnert Park	0.336%	0.384%	0.422%	270	66	72	408	-9	-	155	38	42	235	-5	-	98	167	265	-	253	433	686	-	1,580
Ross	0.035%	0.013%	0.016%	28	2	3	33	1	-	16	1	2	19	1	-	10	6	16	-	26	15	41	-	111
San Anselmo	0.270%	0.098%	0.115%	216	17	20	253	0	-	124	10	11	145	0	-	78	43	121	-	203	111	314	-	833
San Bruno	0.585%	0.924%	0.542%	469	159	93	721	-17	-	270	91	54	415	-10	-	170	403	573	-	440	1,043	1,483	-	3,165
San Carlos	0.735%	0.514%	0.359%	589	88	62	739	0	-	339	51	35	425	0	-	214	224	438	-	553	580	1,133	-	2,735
San Francisco	16.082%	20.705%	28.689%	12,883	3,554	4,925	21,359	-492	-	7,418	2,046	2,836	12,294	-280	-	4,677	9,033	13,717	-	12,102	23,371	35,471	-	82,069
San Jose	13.149%	15.786%	12.819%	10,533	2,710	2,201	15,444	-356	-	6,065	1,560	1,267	8,892	-205	-	3,824	6,887	10,711	-	9,895	17,819	27,714	-	62,200
San Leandro	0.612%	1.188%	1.097%	490	204	188	882	-20	-	282	117	108	507	-12	-	178	518	696	-	461	1,341	1,802	-	3,855
San Mateo	1.697%	1.562%	1.112%	1,360	268	191	1,819	-42	-	783	154	110	1,047	-24	-	494	681	1,175	-	1,277	1,763	3,040	-	7,015
San Pablo	0.134%	0.212%	0.196%	107	36	34	177	-4	-	62	21	19	102	-2	-	39	93	132	-	101	240	341	-	746
San Rafael	0.803%	0.661%	0.703%	643	113	121	877	-20	-	370	65	69	504	-12	-	233	288	521	-	604	746	1,350	-	3,220
San Ramon	1.574%	0.709%	0.666%	1,261	122	114	1,497	0	-	726	70	66	862	0	-	458	309	767	-	1,185	800	1,985	-	5,111
Santa Clara	2.618%	2.796%	2.112%	2,097	480	363	2,940	-68	-	1,207	276	209	1,692	-39	-	761	1,220	1,981	-	1,970	3,156	5,126	-	11,632

APPENDIX 5

Final RHNA Allocation by Jurisdiction, with Factor Components

	FACTOR DISTRIBUTIONS			ALLOCATION BUILDING BLOCKS (Weights determine the share of each income group's units that is assigned to a factor, and the factor is used to geographically allocate those units)																		
	(Each sums to 100%)			VERY LOW INCOME						LOW INCOME						MODERATE INCOME				ABOVE MODERATE INCOME				
Factor	ACCESS TO HIGH OPPORTUNITY AREAS	JOB PROXIMITY – AUTO	JOB PROXIMITY – TRANSIT	ACCESS TO HIGH OPPORTUNITY AREAS	JOB PROXIMITY – AUTO	JOB PROXIMITY – TRANSIT	SUBTOTAL	EQUITY ADJUSTMENT	RHNA APPEALS	ACCESS TO HIGH OPPORTUNITY AREAS	JOB PROXIMITY – AUTO	JOB PROXIMITY – TRANSIT	SUBTOTAL	EQUITY ADJUSTMENT	RHNA APPEALS	ACCESS TO HIGH OPPORTUNITY AREAS	JOB PROXIMITY – AUTO	SUBTOTAL	RHNA APPEALS	ACCESS TO HIGH OPPORTUNITY AREAS	JOB PROXIMITY – AUTO	SUBTOTAL	RHNA APPEALS	
Factor Weight				70%	15%	15%	100%			70%	15%	15%	100%			40%	60%	100%		40%	60%	100%		TOTAL
Jurisdiction	**100%**	**100%**	**100%**	**80,109**	**17,166**	**17,166**	**114,442**			**46,124**	**9,884**	**9,884**	**65,892**			**29,085**	**43,627**	**72,712**		**75,252**	**112,878**	**188,130**		**441,176**
Santa Rosa	1.066%	1.057%	1.234%	854	181	212	1,247	-29	-	492	104	122	718	-17	-	310	461	771	-	802	1,193	1,995	-	4,685
Saratoga	0.453%	0.335%	0.192%	363	58	33	454	0	-	209	33	19	261	0	-	132	146	278	-	341	378	719	-	1,712
Sausalito	0.202%	0.127%	0.091%	162	22	16	200	0	-	93	13	9	115	0	-	59	55	114	-	152	143	295	-	724
Sebastopol	0.046%	0.051%	0.057%	37	9	10	56	-1	-	21	5	6	32	-1	-	13	22	35	-	35	57	92	-	213
Sonoma	0.072%	0.067%	0.089%	58	12	15	85	-2	-	33	7	9	49	-1	-	21	29	50	-	54	76	130	-	311
South San Francisco	0.709%	1.178%	0.713%	568	202	122	892	-21	-	327	116	71	514	-12	-	206	514	720	-	533	1,330	1,863	-	3,956
St. Helena	0.036%	0.035%	0.045%	29	6	8	43	60	-	17	3	4	24	35	-	11	15	26	-	27	39	66	-	254
Sunnyvale	2.703%	2.855%	1.822%	2,165	490	313	2,968	0	-	1,247	282	180	1,709	0	-	786	1,246	2,032	-	2,034	3,223	5,257	-	11,966
Tiburon	0.204%	0.079%	0.085%	164	14	15	193	0	-	94	8	8	110	0	-	59	34	93	-	154	89	243	-	639
Unincorporated Alameda	1.191%	0.957%	0.952%	954	164	163	1,281	-30	-	549	95	94	738	-17	-	346	417	763	-	896	1,080	1,976	-	4,711
Unincorporated Contra Costa	2.038%	1.429%	1.475%	1,633	245	253	2,131	-49	-10	940	141	146	1,227	-28	-5	593	624	1,217	-6	1,534	1,613	3,147	-14	7,610
Unincorporated Marin	1.116%	0.428%	0.551%	894	74	95	1,063	37	-	515	42	54	611	23	-	325	187	512	-	840	483*	1,323	-	3,569
Unincorporated Napa	0.190%	0.150%	0.187%	152	26	32	210	159	-	88	15	18	121	92	-	55	65	120	-	143	169	312	-	1,014
Unincorporated San Mateo	0.825%	0.443%	0.544%	661	76	93	830	-19	-	381	44	54	479	-11	-	240	193	433	-	621	500	1,121	-	2,833
Unincorporated Santa Clara	0.807%	0.625%	0.550%	647	107	94	848	-20	-	372	62	54	488	-11	-	235	273	508	-	607	705	1,312	-	3,125
Unincorporated Sonoma	0.926%	0.820%	1.031%	742	141	177	1,060	-24	-	427	81	102	610	-14	-	269	358	627	-	697	925	1,622	-	3,881
Union City	0.490%	0.549%	0.559%	392	94	96	582	280	-	226	54	55	335	161	-	142	240	382	-	368	620	988	-	2,728
Walnut Creek	1.757%	0.870%	0.808%	1,408	149	139	1,696	-39	-	810	86	80	976	-22	-	511	379	890	-	1,322	982	2,304	-	5,805
Windsor	0.140%	0.154%	0.174%	112	26	30	168	217	-	65	15	17	97	125	-	41	67	108	-	105	174	279	-	994

APPENDIX 5

Final RHNA Allocation by Jurisdiction, with Factor Components

	FACTOR DISTRIBUTIONS			ALLOCATION BUILDING BLOCKS (Weights determine the share of each income group's units that is assigned to a factor, and the factor is used to geographically allocate those units)																			
	(Each sums to 100%)			VERY LOW INCOME						LOW INCOME						MODERATE INCOME				ABOVE MODERATE INCOME			
Factor	ACCESS TO HIGH OPPORTUNITY AREAS	JOB PROXIMITY – AUTO	JOB PROXIMITY – TRANSIT	ACCESS TO HIGH OPPORTUNITY AREAS	JOB PROXIMITY – AUTO	JOB PROXIMITY – TRANSIT	SUBTOTAL	EQUITY ADJUSTMENT	RHNA APPEALS	ACCESS TO HIGH OPPORTUNITY AREAS	JOB PROXIMITY – AUTO	JOB PROXIMITY – TRANSIT	SUBTOTAL	EQUITY ADJUSTMENT	RHNA APPEALS	ACCESS TO HIGH OPPORTUNITY AREAS	JOB PROXIMITY – AUTO	SUBTOTAL	RHNA APPEALS	ACCESS TO HIGH OPPORTUNITY AREAS	JOB PROXIMITY – AUTO	SUBTOTAL	RHNA APPEALS	TOTAL
Factor Weight				**70%**	**15%**	**15%**	**100%**			**70%**	**15%**	**15%**	**100%**			**40%**	**60%**	**100%**		**40%**	**60%**	**100%**		
Jurisdiction	**100%**	**100%**	**100%**	**80,109**	**17,166**	**17,166**	**114,442**			**46,124**	**9,884**	**9,884**	**65,892**			**29,085**	**43,627**	**72,712**		**75,252**	**112,878**	**188,130**		**441,176**
Woodside	0.092%	0.058%	0.039%	73	10	7	90	0	–	42	6	4	52	0	–	27	25	52	–	69	65	134	–	328
Yountville	0.016%	0.016%	0.020%	13	3	3	19	0	–	7	2	2	11	0	–	5	7	12	–	12	18	30	–	72
Solano Subregion**	–	–	–	1,911	448	510	2,869	-66	–	1,099	259	293	1,651	-39	–	693	1,139	1,832	–	1,797	2,948	4,745	–	10,992
REGION	**100.000%**	**100.000%**	**100.000%**	**80,109**	**17,166**	**17,166**	**114,442**	–	–	**46,124**	**9,884**	**9,884**	**65,892**	–	–	**29,085**	**43,627**	**72,712**	–	**75,252**	**112,878**	**188,130**	–	**441,176**

Unit numbers for each factor may not add up to the total due to rounding

The allocation is done with floating point precision internally, but rounding is done to get whole unit counts for each income group in a jurisdiction. The rounded unit counts were adjusted in the Subtotal column to ensure they add up to the total units by income category from the regional housing needs determination (RHND). The equity adjustment was applied after this step, and the same check was performed again to ensure the resulting allocations match the RHND.

* The Draft RHNA Plan issued in May 2021 incorrectly reported that the Job Proximity - Auto factor contributed 484 units to Marin County's above moderate-income allocation. This total should have been reported as 483 units. This error does not affect the County's total allocation of above moderate-income units, which is correctly reported as 1,323 units.

** Jurisdictions in Solano County formed a subregion to complete a separate RHNA process on behalf of all jurisdictions in the county. The Solano Subregion adopted its final RHNA allocations (developed using its own RHNA methodology) on November 18, 2021. This table shows how the share of the RHND assigned by ABAG to the Solano subregion was determined.

APPENDIX 6

Equity Adjustment	STEP 1: IDENTIFY JURISDICTIONS EXHIBITING RACIAL AND ECONOMIC EXCLUSION			STEP 2: COMPARE JURISDICTION'S LOWER-INCOME ALLOCATION FROM FACTORS/WEIGHTS TO LOWER-INCOME ALLOCATION NEEDED TO BE PROPORTIONAL TO JURISDICTION'S SHARE OF 2020 HOUSEHOLDS								STEP 3: IDENTIFY CHANGE IN UNITS BY INCOME CATEGORY[3]			STEP 4: FINAL VERY LOW- AND LOW-INCOME ALLOCATIONS	
				2020 HOUSEHOLDS		UNMODIFIED ALLOCATION FROM FACTORS/WEIGHTS										BEGINNING ALLOCATION PLUS EQUITY ADJUSTMENT	
	DIVERGENCE INDEX SCORE	SHARE OF HOUSEHOLDS ABOVE 120% AMI[1]	EQUITY ADJUSTMENT COMPOSITE SCORE[2]	TOTAL	SHARE OF REGION	VERY LOW-INCOME UNITS	LOW-INCOME UNITS	VERY LOW-INCOME SHARE	LOW-INCOME SHARE	HYPOTHETICAL VERY LOW-INCOME PROPORTIONAL	HYPOTHETICAL LOW-INCOME PROPORTIONAL	TOTAL	VERY LOW-INCOME UNITS	LOW-INCOME UNITS	VERY LOW-INCOME UNITS	LOW-INCOME UNITS
More Exclusionary – Subject to Adjustment (the more exclusionary jurisdictions whose allocations based on factors/weights need to be increased to meet the equity adjustment's proportionality threshold)																
Atherton	0.246	0.821	1.066	2,273	0.083%	81	47	0.071%	0.071%	94	54	20	13	7	94	54
Daly City	0.273	0.445	0.718	32,167	1.168%	1,039	598	0.908%	0.908%	1,336	769	468	297	171	1,336	769
Gilroy	0.310	0.479	0.790	16,116	0.585%	359	207	0.314%	0.314%	669	385	488	310	178	669	385
Half Moon Bay	0.207	0.562	0.768	4,363	0.158%	93	54	0.081%	0.082%	181	104	138	88	50	181	104
Healdsburg	0.346	0.454	0.800	4,576	0.166%	78	45	0.068%	0.068%	190	109	176	112	64	190	109
Hercules	0.208	0.571	0.779	8,278	0.300%	179	104	0.156%	0.158%	344	198	259	165	94	344	198
Hillsborough	0.198	0.847	1.045	3,733	0.136%	153	88	0.134%	0.134%	155	89	3	2	1	155	89
Livermore	0.133	0.579	0.712	31,696	1.151%	1,240	714	1.084%	1.084%	1,317	758	121	77	44	1,317	758
Mill Valley	0.455	0.659	1.115	6,298	0.229%	252	144	0.220%	0.219%	262	151	17	10	7	262	151
Monte Sereno	0.278	0.811	1.090	1,265	0.046%	51	30	0.045%	0.046%	53	30	2	2	0	53	30
Pleasant Hill	0.149	0.550	0.699	13,626	0.495%	451	261	0.394%	0.396%	566	326	180	115	65	566	326
Portola Valley	0.387	0.735	1.122	1,768	0.064%	70	40	0.061%	0.061%	73	42	5	3	2	73	42
Ross	0.607	0.765	1.372	826	0.030%	33	19	0.029%	0.029%	34	20	2	1	1	34	20
St. Helena	0.338	0.401	0.739	2,477	0.090%	43	24	0.038%	0.036%	103	59	95	60	35	103	59
Unincorporated Marin	0.292	0.577	0.869	26,491	0.962%	1,063	611	0.929%	0.927%	1,100	634	60	37	23	1,100	634
Unincorporated Napa	0.256	0.521	0.777	8,889	0.323%	210	121	0.183%	0.184%	369	213	251	159	92	369	213
Union City	0.233	0.525	0.758	20,751	0.753%	582	335	0.509%	0.508%	862	496	441	280	161	862	496
Windsor	0.264	0.500	0.763	9,272	0.337%	168	97	0.147%	0.147%	385	222	342	217	125	385	222

APPENDIX 6

Equity Adjustment	STEP 1: IDENTIFY JURISDICTIONS EXHIBITING RACIAL AND ECONOMIC EXCLUSION			STEP 2: COMPARE JURISDICTION'S LOWER-INCOME ALLOCATION FROM FACTORS/WEIGHTS TO LOWER-INCOME ALLOCATION NEEDED TO BE PROPORTIONAL TO JURISDICTION'S SHARE OF 2020 HOUSEHOLDS								STEP 3: IDENTIFY CHANGE IN UNITS BY INCOME CATEGORY[3]			STEP 4: FINAL VERY LOW- AND LOW-INCOME ALLOCATIONS	
				2020 HOUSEHOLDS		UNMODIFIED ALLOCATION FROM FACTORS/WEIGHTS										BEGINNING ALLOCATION PLUS EQUITY ADJUSTMENT	
	DIVERGENCE INDEX SCORE	SHARE OF HOUSEHOLDS ABOVE 120% AMI[1]	EQUITY ADJUSTMENT COMPOSITE SCORE[2]	TOTAL	SHARE OF REGION	VERY LOW-INCOME UNITS	LOW-INCOME UNITS	VERY LOW-INCOME SHARE	LOW-INCOME SHARE	HYPOTHETICAL VERY LOW-INCOME PROPORTIONAL	HYPOTHETICAL LOW-INCOME PROPORTIONAL	TOTAL	VERY LOW-INCOME UNITS	LOW-INCOME UNITS	VERY LOW-INCOME UNITS	LOW-INCOME UNITS
More Exclusionary – Not Subject to Adjustment (the more exclusionary jurisdictions whose allocations based on factors/weights already meet the equity adjustment's proportionality threshold)																
Belmont	0.104	0.627	0.731	10,516	0.382%	488	281	0.426%	0.426%	437	252	-	-	-	488	281
Belvedere	0.611	0.709	1.320	933	0.034%	49	28	0.043%	0.042%	39	22	-	-	-	49	28
Clayton	0.287	0.691	0.978	4,005	0.145%	170	97	0.149%	0.147%	166	96	-	-	-	170	97
Corte Madera	0.360	0.665	1.026	4,066	0.148%	213	123	0.186%	0.187%	169	97	-	-	-	213	123
Cupertino	0.432	0.700	1.132	19,998	0.726%	1,193	687	1.042%	1.043%	831	478	-	-	-	1,193	687
Danville	0.298	0.694	0.992	15,474	0.562%	652	376	0.570%	0.571%	643	370	-	-	-	652	376
Dublin	0.110	0.705	0.815	22,021	0.799%	1,085	625	0.948%	0.949%	915	527	-	-	-	1,085	625
Fairfax	0.409	0.536	0.946	3,294	0.120%	149	86	0.130%	0.131%	137	79	-	-	-	149	86
Foster City	0.150	0.702	0.852	12,449	0.452%	520	299	0.454%	0.454%	517	298	-	-	-	520	299
Fremont	0.243	0.627	0.871	74,488	2.704%	3,640	2,096	3.181%	3.181%	3,094	1,782	-	-	-	3,640	2,096
Lafayette	0.274	0.661	0.936	9,503	0.345%	599	344	0.523%	0.522%	395	227	-	-	-	599	344
Larkspur	0.399	0.514	0.913	5,954	0.216%	291	168	0.254%	0.255%	247	142	-	-	-	291	168
Los Altos	0.213	0.767	0.980	11,114	0.403%	501	288	0.438%	0.437%	462	266	-	-	-	501	288
Los Altos Hills	0.215	0.837	1.053	2,915	0.106%	125	72	0.109%	0.109%	121	70	-	-	-	125	72
Los Gatos	0.225	0.617	0.842	12,821	0.465%	537	310	0.469%	0.470%	533	307	-	-	-	537	310
Menlo Park	0.093	0.625	0.718	13,076	0.475%	740	426	0.647%	0.647%	543	313	-	-	-	740	426
Millbrae	0.148	0.577	0.725	8,124	0.295%	575	331	0.502%	0.502%	337	194	-	-	-	575	331
Milpitas	0.397	0.600	0.997	21,814	0.792%	1,685	970	1.472%	1.472%	906	522	-	-	-	1,685	970

APPENDIX 6

Equity Adjustment	STEP 1: IDENTIFY JURISDICTIONS EXHIBITING RACIAL AND ECONOMIC EXCLUSION			STEP 2: COMPARE JURISDICTION'S LOWER-INCOME ALLOCATION FROM FACTORS/WEIGHTS TO LOWER-INCOME ALLOCATION NEEDED TO BE PROPORTIONAL TO JURISDICTION'S SHARE OF 2020 HOUSEHOLDS								STEP 3: IDENTIFY CHANGE IN UNITS BY INCOME CATEGORY[3]			STEP 4: FINAL VERY LOW- AND LOW-INCOME ALLOCATIONS	
				2020 HOUSEHOLDS		UNMODIFIED ALLOCATION FROM FACTORS/WEIGHTS				HYPOTHETICAL VERY LOW-INCOME PROPORTIONAL	HYPOTHETICAL LOW-INCOME PROPORTIONAL				BEGINNING ALLOCATION PLUS EQUITY ADJUSTMENT	
	DIVERGENCE INDEX SCORE	SHARE OF HOUSEHOLDS ABOVE 120% AMI[1]	EQUITY ADJUSTMENT COMPOSITE SCORE[2]	TOTAL	SHARE OF REGION	VERY LOW-INCOME UNITS	LOW-INCOME UNITS	VERY LOW-INCOME SHARE	LOW-INCOME SHARE			TOTAL	VERY LOW-INCOME UNITS	LOW-INCOME UNITS	VERY LOW-INCOME UNITS	LOW-INCOME UNITS
Moraga	0.220	0.667	0.887	5,703	0.207%	318	183	0.278%	0.278%	237	136	-	-	-	318	183
Orinda	0.260	0.761	1.021	6,789	0.246%	372	215	0.325%	0.326%	282	162	-	-	-	372	215
Palo Alto	0.154	0.649	0.804	27,667	1.004%	1,556	896	1.360%	1.360%	1,149	662	-	-	-	1,556	896
Piedmont	0.275	0.799	1.074	3,910	0.142%	163	94	0.142%	0.143%	162	94	-	-	-	163	94
Pleasanton	0.098	0.674	0.773	27,283	0.990%	1,750	1,008	1.529%	1.530%	1,133	653	-	-	-	1,750	1,008
San Anselmo	0.501	0.610	1.110	5,318	0.193%	253	145	0.221%	0.220%	221	127	-	-	-	253	145
San Carlos	0.212	0.686	0.898	11,702	0.425%	739	425	0.646%	0.645%	486	280	-	-	-	739	425
San Ramon	0.151	0.696	0.847	28,004	1.017%	1,497	862	1.308%	1.308%	1,163	670	-	-	-	1,497	862
Saratoga	0.267	0.710	0.977	10,800	0.392%	454	261	0.397%	0.396%	449	258	-	-	-	454	261
Sausalito	0.494	0.570	1.064	4,142	0.150%	200	115	0.175%	0.175%	172	99	-	-	-	200	115
Sunnyvale	0.101	0.618	0.719	57,888	2.101%	2,968	1,709	2.593%	2.594%	2,405	1,385	-	-	-	2,968	1,709
Tiburon	0.447	0.675	1.122	3,893	0.141%	193	110	0.169%	0.167%	162	93	-	-	-	193	110
Woodside	0.382	0.754	1.136	2,034	0.074%	90	52	0.079%	0.079%	84	49	-	-	-	90	52
Other Jurisdictions (the jurisdictions not identified as exclusionary whose lower-income allocations are shifted to the group of more exclusionary jurisdictions whose allocations need to be increased)																
Alameda	0.047	0.490	0.537	31,829	1.155%	1,455	837	1.271%	1.270%	1,322	761	-53	-34	-19	1,421	818
Albany	0.065	0.444	0.509	6,434	0.234%	315	182	0.275%	0.276%	267	154	-11	-7	-4	308	178
American Canyon	0.065	0.489	0.553	5,967	0.217%	115	67	0.100%	0.102%	248	143	-5	-3	-2	112	65
Antioch	0.193	0.347	0.540	34,096	1.238%	811	467	0.709%	0.709%	1,416	815	-30	-19	-11	792	456
Berkeley	0.075	0.439	0.514	47,718	1.732%	2,504	1,441	2.188%	2.187%	1,982	1,141	-91	-58	-33	2,446	1,408

APPENDIX 6

Equity Adjustment	STEP 1: IDENTIFY JURISDICTIONS EXHIBITING RACIAL AND ECONOMIC EXCLUSION			STEP 2: COMPARE JURISDICTION'S LOWER-INCOME ALLOCATION FROM FACTORS/WEIGHTS TO LOWER-INCOME ALLOCATION NEEDED TO BE PROPORTIONAL TO JURISDICTION'S SHARE OF 2020 HOUSEHOLDS								STEP 3: IDENTIFY CHANGE IN UNITS BY INCOME CATEGORY[3]			STEP 4: FINAL VERY LOW- AND LOW-INCOME ALLOCATIONS	
				2020 HOUSEHOLDS		UNMODIFIED ALLOCATION FROM FACTORS/WEIGHTS										BEGINNING ALLOCATION PLUS EQUITY ADJUSTMENT	
	DIVERGENCE INDEX SCORE	SHARE OF HOUSEHOLDS ABOVE 120% AMI[1]	EQUITY ADJUSTMENT COMPOSITE SCORE[2]	TOTAL	SHARE OF REGION	VERY LOW-INCOME UNITS	LOW-INCOME UNITS	VERY LOW-INCOME SHARE	LOW-INCOME SHARE	HYPOTHETICAL VERY LOW-INCOME PROPORTIONAL	HYPOTHETICAL LOW-INCOME PROPORTIONAL	TOTAL	VERY LOW-INCOME UNITS	LOW-INCOME UNITS	VERY LOW-INCOME UNITS	LOW-INCOME UNITS
Brentwood	0.084	0.522	0.606	20,067	0.728%	411	237	0.359%	0.360%	834	480	-14	-9	-5	402	232
Brisbane	0.009	0.536	0.545	1,890	0.069%	324	187	0.283%	0.284%	79	45	-11	-7	-4	317	183
Burlingame	0.082	0.595	0.677	12,386	0.450%	883	509	0.772%	0.772%	515	296	-32	-20	-12	863	497
Calistoga	0.280	0.322	0.602	2,067	0.075%	32	19	0.028%	0.029%	86	49	-1	-1	0	31	19
Campbell	0.041	0.572	0.613	16,855	0.612%	770	444	0.673%	0.674%	700	403	-28	-18	-10	752	434
Cloverdale	0.228	0.336	0.564	3,328	0.121%	76	44	0.066%	0.067%	138	80	-3	-2	-1	74	43
Colma	0.090	0.470	0.560	499	0.018%	45	26	0.039%	0.039%	21	12	-2	-1	-1	44	25
Concord	0.074	0.397	0.471	45,297	1.644%	1,322	762	1.155%	1.156%	1,882	1,083	-48	-30	-18	1,292	744
Cotati	0.295	0.341	0.636	3,002	0.109%	61	35	0.053%	0.053%	125	72	-2	-1	-1	60	34
East Palo Alto*	0.452	0.337	0.789	7,274	0.264%	169	97	0.148%	0.147%	302	174	-6	-4	-2	165	95
El Cerrito	0.059	0.501	0.561	10,332	0.375%	342	197	0.299%	0.299%	429	247	-13	-8	-5	334	192
Emeryville	0.084	0.505	0.589	6,667	0.242%	462	265	0.404%	0.402%	277	159	-17	-11	-6	451	259
Hayward	0.147	0.383	0.530	48,286	1.753%	1,100	632	0.961%	0.959%	2,006	1,155	-40	-25	-15	1,075	617
Martinez	0.161	0.516	0.677	14,339	0.520%	358	206	0.313%	0.313%	596	343	-13	-8	-5	350	201
Morgan Hill	0.097	0.560	0.657	14,688	0.533%	268	155	0.234%	0.235%	610	351	-10	-6	-4	262	151
Mountain View	0.038	0.609	0.647	34,445	1.250%	2,838	1,635	2.480%	2.481%	1,431	824	-103	-65	-38	2,773	1,597
Napa	0.271	0.393	0.664	28,655	1.040%	516	298	0.451%	0.452%	1,190	685	-19	-12	-7	504	291
Newark	0.061	0.547	0.608	14,304	0.519%	475	274	0.415%	0.416%	594	342	-17	-11	-6	464	268

APPENDIX 6

Equity Adjustment	STEP 1: IDENTIFY JURISDICTIONS EXHIBITING RACIAL AND ECONOMIC EXCLUSION			STEP 2: COMPARE JURISDICTION'S LOWER-INCOME ALLOCATION FROM FACTORS/WEIGHTS TO LOWER-INCOME ALLOCATION NEEDED TO BE PROPORTIONAL TO JURISDICTION'S SHARE OF 2020 HOUSEHOLDS								STEP 3: IDENTIFY CHANGE IN UNITS BY INCOME CATEGORY[3]			STEP 4: FINAL VERY LOW- AND LOW-INCOME ALLOCATIONS	
				2020 HOUSEHOLDS		UNMODIFIED ALLOCATION FROM FACTORS/WEIGHTS										BEGINNING ALLOCATION PLUS EQUITY ADJUSTMENT	
	DIVERGENCE INDEX SCORE	SHARE OF HOUSEHOLDS ABOVE 120% AMI[1]	EQUITY ADJUSTMENT COMPOSITE SCORE[2]	TOTAL	SHARE OF REGION	VERY LOW-INCOME UNITS	LOW-INCOME UNITS	VERY LOW-INCOME SHARE	LOW-INCOME SHARE	HYPOTHETICAL VERY LOW-INCOME PROPORTIONAL	HYPOTHETICAL LOW-INCOME PROPORTIONAL	TOTAL	VERY LOW-INCOME UNITS	LOW-INCOME UNITS	VERY LOW-INCOME UNITS	LOW-INCOME UNITS
Novato	0.184	0.482	0.666	20,606	0.748%	583	336	0.509%	0.510%	856	493	-21	-13	-8	570	328
Oakland	0.189	0.352	0.541	164,296	5.964%	6,665	3,838	5.824%	5.825%	6,825	3,930	-242	-154	-88	6,511	3,750
Oakley	0.143	0.483	0.626	12,363	0.449%	286	165	0.250%	0.250%	514	296	-11	-7	-4	279	161
Pacifica	0.049	0.573	0.622	13,774	0.500%	551	317	0.481%	0.481%	572	329	-20	-13	-7	538	310
Petaluma	0.259	0.435	0.694	23,027	0.836%	511	295	0.447%	0.448%	957	551	-19	-12	-7	499	288
Pinole	0.029	0.457	0.486	6,907	0.251%	124	71	0.108%	0.108%	287	165	-5	-3	-2	121	69
Pittsburg	0.216	0.325	0.540	22,067	0.801%	518	298	0.453%	0.452%	917	528	-19	-12	-7	506	291
Redwood City	0.084	0.543	0.628	30,346	1.102%	1,141	658	0.997%	0.999%	1,261	726	-41	-26	-15	1,115	643
Richmond	0.248	0.287	0.535	37,271	1.353%	860	496	0.751%	0.753%	1,548	891	-31	-20	-11	840	485
Rohnert Park	0.180	0.277	0.457	16,722	0.607%	408	235	0.357%	0.357%	695	400	-14	-9	-5	399	230
San Bruno	0.046	0.511	0.556	15,573	0.565%	721	415	0.630%	0.630%	647	372	-27	-17	-10	704	405
San Francisco	0.029	0.517	0.546	373,404	13.554%	21,359	12,294	18.664%	18.658%	15,511	8,931	-772	-492	-280	20,867	12,014
San Jose	0.066	0.519	0.585	324,692	11.786%	15,444	8,892	13.495%	13.495%	13,488	7,766	-561	-356	-205	15,088	8,687
San Leandro	0.070	0.361	0.431	30,476	1.106%	882	507	0.771%	0.769%	1,266	729	-32	-20	-12	862	495
San Mateo	0.021	0.559	0.580	38,872	1.411%	1,819	1,047	1.589%	1.589%	1,615	930	-66	-42	-24	1,777	1,023
San Pablo	0.434	0.161	0.595	9,088	0.330%	177	102	0.155%	0.155%	378	217	-6	-4	-2	173	100
San Rafael	0.175	0.462	0.637	23,154	0.840%	877	504	0.766%	0.765%	962	554	-32	-20	-12	857	492
Santa Clara	0.060	0.570	0.631	46,387	1.684%	2,940	1,692	2.569%	2.568%	1,927	1,109	-107	-68	-39	2,872	1,653

APPENDIX 6

Equity Adjustment	STEP 1: IDENTIFY JURISDICTIONS EXHIBITING RACIAL AND ECONOMIC EXCLUSION			STEP 2: COMPARE JURISDICTION'S LOWER-INCOME ALLOCATION FROM FACTORS/WEIGHTS TO LOWER-INCOME ALLOCATION NEEDED TO BE PROPORTIONAL TO JURISDICTION'S SHARE OF 2020 HOUSEHOLDS								STEP 3: IDENTIFY CHANGE IN UNITS BY INCOME CATEGORY[3]			STEP 4: FINAL VERY LOW- AND LOW-INCOME ALLOCATIONS	
				2020 HOUSEHOLDS		UNMODIFIED ALLOCATION FROM FACTORS/WEIGHTS										BEGINNING ALLOCATION PLUS EQUITY ADJUSTMENT	
	DIVERGENCE INDEX SCORE	SHARE OF HOUSEHOLDS ABOVE 120% AMI[1]	EQUITY ADJUSTMENT COMPOSITE SCORE[2]	TOTAL	SHARE OF REGION	VERY LOW-INCOME UNITS	LOW-INCOME UNITS	VERY LOW-INCOME SHARE	LOW-INCOME SHARE	HYPOTHETICAL VERY LOW-INCOME PROPORTIONAL	HYPOTHETICAL LOW-INCOME PROPORTIONAL	TOTAL	VERY LOW-INCOME UNITS	LOW-INCOME UNITS	VERY LOW-INCOME UNITS	LOW-INCOME UNITS
Santa Rosa	0.173	0.327	0.500	66,051	2.398%	1,247	718	1.090%	1.090%	2,744	1,580	-46	-29	-17	1,218	701
Sebastopol*	0.372	0.367	0.738	3,372	0.122%	56	32	0.049%	0.049%	140	81	-2	-1	-1	55	31
Sonoma*	0.378	0.390	0.768	5,030	0.183%	85	49	0.074%	0.074%	209	120	-3	-2	-1	83	48
South San Francisco	0.132	0.484	0.616	21,409	0.777%	892	514	0.779%	0.780%	889	512	-33	-21	-12	871	502
Unincorporated Alameda	0.034	0.431	0.465	48,899	1.775%	1,281	738	1.119%	1.120%	2,031	1,170	-47	-30	-17	1,251	721
Unincorporated Contra Costa	0.056	0.484	0.540	60,527	2.197%	2,131	1,227	1.862%	1.862%	2,514	1,448	-77	-49	-28	2,082	1,199
Unincorporated San Mateo	0.101	0.585	0.686	21,461	0.779%	830	479	0.725%	0.727%	892	513	-30	-19	-11	811	468
Unincorporated Santa Clara	0.063	0.542	0.604	26,299	0.955%	848	488	0.741%	0.741%	1,092	629	-31	-20	-11	828	477
Unincorporated Sonoma*	0.328	0.387	0.715	54,387	1.974%	1,060	610	0.926%	0.926%	2,259	1,301	-38	-24	-14	1,036	596
Walnut Creek	0.191	0.490	0.681	32,363	1.175%	1,696	976	1.482%	1.481%	1,344	774	-61	-39	-22	1,657	954
Yountville*[4]	0.396	0.328	0.724	1,030	0.037%	19	11	0.017%	0.017%	43	25	0	0	0	19	11
Solano Subregion[5]												-105	-66	-39		

Sources: U.S. Census Bureau, American Community Survey 5-Year Data (2014-2018), Table B19013 for median household income; Table B19001 for households by income group; Table B03002 for population by race / ethnicity. State of California, Department of Finance, E-5 Population and Housing Estimates for Cities, Counties and the State – January 1, 2011-2020. Sacramento, California, May 2020.

** These jurisdictions were excluded from being subject to the equity adjustment because they had average incomes in the bottom quartile for the region.*

[1] According to American Community Survey (ACS 2014-2018 PUMS) data, 120% of the area median income (AMI) for Bay Area households was $120,840. Due to the way the income categories are structured in the ACS summary files needed for jurisdiction tabulations, the information reported here includes households with incomes greater than $100,000.

[2] Bay Area Median Composite Score: 0.694

[3] Total units to shift from 60 least exclusive jurisdictions to 18 jurisdictions subject to equity adjustment: 3,068 units

[4] The proportional reduction in Yountville's allocation of lower-income units was less than a unit, so the equity adjustment did not affect its final allocation.

[5] Jurisdictions in Solano County formed a subregion to complete a separate RHNA process on behalf of all jurisdictions in the county. The Solano Subregion adopted its final RHNA allocations (developed using its own RHNA methodology) on November 18, 2021. The unit reductions from the equity adjustment shown here were incorporated into the final subregional share assigned by ABAG to the Solano Subregion.

APPENDIX 7

Draft RHNA Allocations

On May 25, 2021, ABAG notified the city/town manager or county administrator and planning or community development director of each local jurisdiction, HCD, and members of the public about the adoption of the draft RHNA allocations and the initiation of the appeals period.

Jurisdiction	VERY LOW INCOME (<50% of Area Median Income)	LOW INCOME (50-80% of Area Median Income)	MODERATE INCOME (80-120% of Area Median Income)	ABOVE MODERATE INCOME (>120% of Area Median Income)	TOTAL
ALAMEDA COUNTY					
Alameda	1,421	818	868	2,246	5,353
Albany	308	178	175	453	1,114
Berkeley	2,446	1,408	1,416	3,664	8,934
Dublin	1,085	625	560	1,449	3,719
Emeryville	451	259	308	797	1,815
Fremont	3,640	2,096	1,996	5,165	12,897
Hayward	1,075	617	817	2,115	4,624
Livermore	1,317	758	696	1,799	4,570
Newark	464	268	318	824	1,874
Oakland	6,511	3,750	4,457	11,533	26,251
Piedmont	163	94	92	238	587
Pleasanton	1,750	1,008	894	2,313	5,965
San Leandro	862	495	696	1,802	3,855
Unincorporated Alameda County	1,251	721	763	1,976	4,711
Union City	862	496	382	988	2,728

Jurisdiction	VERY LOW INCOME (<50% of Area Median Income)	LOW INCOME (50-80% of Area Median Income)	MODERATE INCOME (80-120% of Area Median Income)	ABOVE MODERATE INCOME (>120% of Area Median Income)	TOTAL
CONTRA COSTA COUNTY					
Antioch	792	456	493	1,275	3,016
Brentwood	402	232	247	641	1,522
Clayton	170	97	84	219	570
Concord	1,292	744	847	2,190	5,073
Danville	652	376	338	875	2,241
El Cerrito	334	192	241	624	1,391
Hercules	344	198	126	327	995
Lafayette	599	344	326	845	2,114
Martinez	350	201	221	573	1,345
Moraga	318	183	172	445	1,118
Oakley	279	161	172	446	1,058
Orinda	372	215	215	557	1,359
Pinole	121	69	87	223	500
Pittsburg	506	291	340	880	2,017
Pleasant Hill	566	326	254	657	1,803
Richmond	840	485	638	1,651	3,614
San Pablo	173	100	132	341	746
San Ramon	1,497	862	767	1,985	5,111
Unincorporated Contra Costa	2,082	1,199	1,217	3,147	7,645
Walnut Creek	1,657	954	890	2,304	5,805

APPENDIX 7

Jurisdiction	VERY LOW INCOME (<50% of Area Median Income)	LOW INCOME (50-80% of Area Median Income)	MODERATE INCOME (80-120% of Area Median Income)	ABOVE MODERATE INCOME (>120% of Area Median Income)	TOTAL
MARIN COUNTY					
Belvedere	49	28	23	60	160
Corte Madera	213	123	108	281	725
Fairfax	149	86	71	184	490
Larkspur	291	168	145	375	979
Mill Valley	262	151	126	326	865
Novato	570	328	332	860	2,090
Ross	34	20	16	41	111
San Anselmo	253	145	121	314	833
San Rafael	857	492	521	1,350	3,220
Sausalito	200	115	114	295	724
Tiburon	193	110	93	243	639
Unincorporated Marin	1,100	634	512	1,323	3,569
NAPA COUNTY					
American Canyon	112	65	75	194	446
Calistoga	31	19	19	50	119
Napa	504	291	319	825	1,939
St. Helena	103	59	26	66	254
Unincorporated Napa	369	213	120	312	1,014
Yountville	19	11	12	30	72
SAN FRANCISCO COUNTY					
San Francisco (city)	20,867	12,014	13,717	35,471	82,069

Jurisdiction	VERY LOW INCOME (<50% of Area Median Income)	LOW INCOME (50-80% of Area Median Income)	MODERATE INCOME (80-120% of Area Median Income)	ABOVE MODERATE INCOME (>120% of Area Median Income)	TOTAL
SAN MATEO COUNTY					
Atherton	94	54	56	144	348
Belmont	488	281	283	733	1,785
Brisbane	317	183	303	785	1,588
Burlingame	863	497	529	1,368	3,257
Colma	44	25	37	96	202
Daly City	1,336	769	762	1,971	4,838
East Palo Alto	165	95	159	410	829
Foster City	520	299	300	777	1,896
Half Moon Bay	181	104	54	141	480
Hillsborough	155	89	87	223	554
Menlo Park	740	426	496	1,284	2,946
Millbrae	575	331	361	932	2,199
Pacifica	538	310	291	753	1,892
Portola Valley	73	42	39	99	253
Redwood City	1,115	643	789	2,041	4,588
San Bruno	704	405	573	1,483	3,165
San Carlos	739	425	438	1,133	2,735
San Mateo	1,777	1,023	1,175	3,040	7,015
South San Francisco	871	502	720	1,863	3,956
Unincorporated San Mateo	811	468	433	1,121	2,833
Woodside	90	52	52	134	328

APPENDIX 7

Jurisdiction	VERY LOW INCOME (<50% of Area Median Income)	LOW INCOME (50-80% of Area Median Income)	MODERATE INCOME (80-120% of Area Median Income)	ABOVE MODERATE INCOME (>120% of Area Median Income)	TOTAL
SANTA CLARA COUNTY					
Campbell	752	434	499	1,292	2,977
Cupertino	1,193	687	755	1,953	4,588
Gilroy	669	385	200	519	1,773
Los Altos	501	288	326	843	1,958
Los Altos Hills	125	72	82	210	489
Los Gatos	537	310	320	826	1,993
Milpitas	1,685	970	1,131	2,927	6,713
Monte Sereno	53	30	31	79	193
Morgan Hill	262	151	174	450	1,037
Mountain View	2,773	1,597	1,885	4,880	11,135
Palo Alto	1,556	896	1,013	2,621	6,086
San Jose	15,088	8,687	10,711	27,714	62,200
Santa Clara	2,872	1,653	1,981	5,126	11,632
Saratoga	454	261	278	719	1,712
Sunnyvale	2,968	1,709	2,032	5,257	11,966
Unincorporated Santa Clara	828	477	508	1,312	3,125

Jurisdiction	VERY LOW INCOME (<50% of Area Median Income)	LOW INCOME (50-80% of Area Median Income)	MODERATE INCOME (80-120% of Area Median Income)	ABOVE MODERATE INCOME (>120% of Area Median Income)	TOTAL
SOLANO COUNTY*					
Benicia	203	117	135	351	806
Dixon	91	53	57	146	347
Fairfield	778	447	508	1,314	3,047
Rio Vista	127	73	76	197	473
Suisun City	156	90	101	264	611
Unincorporated Solano	237	137	149	385	908
Vacaville	487	279	305	791	1,862
Vallejo	724	416	501	1,297	2,938
SONOMA COUNTY					
Cloverdale	74	43	45	116	278
Cotati	60	34	39	101	234
Healdsburg	190	109	49	128	476
Petaluma	499	288	313	810	1,910
Rohnert Park	399	230	265	686	1,580
Santa Rosa	1,218	701	771	1,995	4,685
Sebastopol	55	31	35	92	213
Sonoma	83	48	50	130	311
Unincorporated Sonoma	1,036	596	627	1,622	3,881
Windsor	385	222	108	279	994
TOTAL	**114,442**	**65,892**	**72,712**	**188,130**	**441,176**

** Jurisdictions in Solano County have formed a subregion and are developing their own methodology to allocate units among the members. The draft allocations shown here are what jurisdictions would receive from ABAG only in the event the subregion is unable to complete its allocation process. The final allocations identified by the Solano County subregion will be reflected in the Final RHNA Plan to be adopted by the end of 2021.*

APPENDIX 8

Summary of Local Jurisdiction Survey Results

This appendix provides information from reports presented to the Housing Methodology Committee (HMC) in March and April 2020. These reports summarized responses to the Local Jurisdiction Survey, and these summaries intended to inform the HMC's development of the RHNA methodology. Though the HMC has concluded its work, this appendix makes reference to factors that the HMC could consider for the methodology, as the HMC was beginning to develop the RHNA methodology when the Local Jurisdiction Survey summary reports were completed.

OVERVIEW OF SURVEY PROCESS

Housing Element Law requires each Council of Government (COG) to survey its member jurisdictions during the Regional Housing Needs Allocation (RHNA) process to gather information on factors that must be considered for inclusion in the methodology.[1] Recent legislation also requires ABAG to collect information on jurisdictions' fair housing issues and strategies for achieving fair housing goals.[2] ABAG staff presented the Housing Methodology Committee with a draft of the survey in November 2019. Staff revised the survey to incorporate feedback from HMC members, local jurisdiction staff, and other stakeholders, and the ABAG Regional Planning Committee approved the survey in December 2019. The survey became available online on January 8, 2020. A survey link was emailed to city managers, county administrators, community development and planning directors, and housing staff in all 109 ABAG jurisdictions. The deadline for completing the survey was February 5, 2020, at which point ABAG received 72 responses, a response rate of 66%. Table 1 shows the response rates for each of the nine Bay Area counties.

Table 1. Local jurisdiction survey response rate by county.

COUNTY	RESPONSES	RESPONSE RATE
Alameda	9	60%
Contra Costa	14	70%
Marin	8	73%
Napa	3	50%
San Francisco	1	100%
San Mateo	14	67%
Santa Clara	13	81%
Solano	4	50%
Sonoma	7	70%

SURVEY ORGANIZATION

The survey consisted of 53 questions in two sections. Section 1 included 36 questions related to the statutory housing and land use factors. These questions were divided into four topics: Relationship Between Jobs and Housing, Housing Opportunities and Constraints, Housing Affordability and Overcrowding, and Housing Demand. Section 2 included 14 questions that collected information on local jurisdictions' fair housing issues as well as strategies and actions for achieving fair housing goals. These questions were divided into three topics: Fair Housing Planning and Data Sources; Diversity/ Segregation, Access to Opportunity, and Housing Needs; and Fair Housing Goals and Actions.

1 See State of California Government Code Section 65584.04(b)(1).

2 See State of California Government Code Section 65584.04(b)(2).

In addition to surveying local jurisdictions on these topics, ABAG staff reviewed the fair housing reports that jurisdictions submit to the federal government if they receive block grant funding from the Department of Housing and Urban Development (HUD). Section 3 discusses common themes from Bay Area jurisdictions' fair housing reports.

SECTION 1: SUMMARY OF RESPONSES TO HOUSING AND LAND USE QUESTIONS

Topic 1: Relationship Between Jobs and Housing

The six questions in this topic area centered on jurisdictions' issues related to jobs-housing fit, which measures the relationship between a jurisdiction's low-wage jobs and homes affordable to low-wage workers. The first question presented each jurisdiction's jobs-housing fit ratio and included a data visualization comparing a jurisdiction's jobs-housing fit ratio to other jurisdictions throughout the region. Respondents were asked to reflect on the jobs-housing fit in their community using both their own perceptions and the data provided. Additionally, respondents had the opportunity to consider the impacts of this balance or imbalance, and they could comment on what strategies might be helpful for addressing issues related to an imbalance between low-wage workers and affordable housing.

Key Takeaways from Respondents' Comments

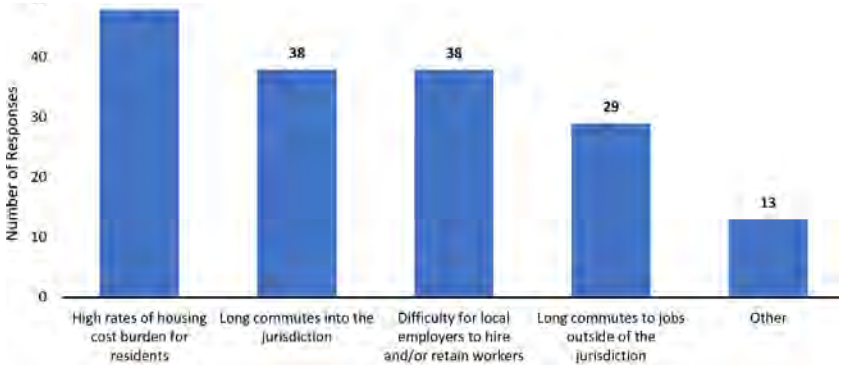
Suggestions for measuring jobs-housing fit: Several jurisdictions commented the rent threshold the survey used for units affordable to low-wage workers excludes many of the deed-restricted affordable units that currently exist in their communities or are in the development pipeline. Multiple respondents provided data on the number of deed-restricted affordable units in their jurisdictions. It is worth noting that, for the jobs-housing fit factor presented to the HMC for the March 2020 meeting, the thresholds for low-wage jobs and low-cost rental units were set higher than the values used for the survey.[3] However, staff and the HMC will take these survey comments into account when deciding how to define the jobs-housing fit ratio and what data sources to use if this factor is selected for the RHNA methodology.

Figure 1. How would you rate the balance between low-wage jobs and the number of homes affordable to low-wage workers in your jurisdiction? (Question 2)

Imbalance between low-wage jobs and affordable housing in the region: 60 jurisdictions (85%) stated the ratio between low-wage jobs and affordable homes in their jurisdiction is imbalanced or very imbalanced, while only 10 (14%) indicated their jurisdiction is balanced (see Figure 1). Responses varied by county, as no jurisdictions in Marin, San Mateo, or Santa Clara Counties reported a balance in their jobs-housing fit ratios. These same counties also contained all of the

3 *For the proposed jobs-housing fit factor, the threshold for a low-wage job is set at $3,333 per month and low-cost rental units are defined as those renting for less than $1,500 per month.*

Figure 2. Which of the following impacts does the balance or imbalance of low-wage workers to homes affordable to low-wage workers have on your jurisdiction? (Question 4)



jurisdictions who stated their jobs-housing fit ratio is very imbalanced.

Reasons for imbalance in local jobs-housing fit ratio: Respondents mentioned a lack of rental housing, state policy limiting deed restrictions for ADUs, high land prices, a lack of land available for development, and limited resources for producing affordable housing due to the end of redevelopment agencies as reasons for the jobs-housing fit imbalance. Multiple jurisdictions noted that, while their jobs-housing fit ratio suggested an imbalance, it was comparable to many other jurisdictions in the region, suggesting a broader regional problem. Lastly, some respondents noted potential for future improvements in their jobs-housing fit ratio based on recent rent stabilization policies, ongoing ADU production, or affordable housing units in the development pipeline.

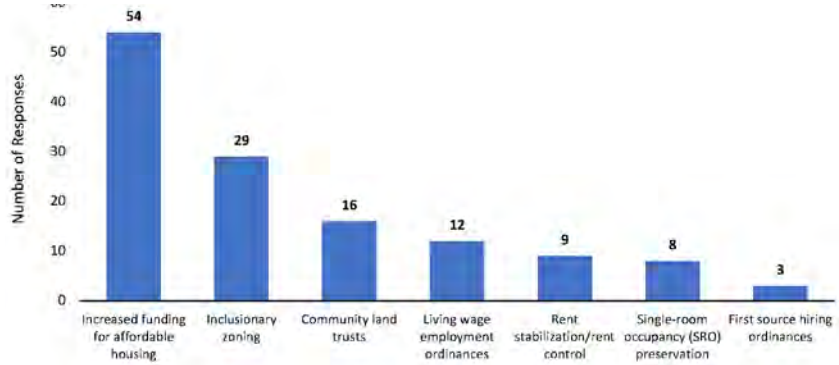
Impacts of imbalance in local jobs-housing fit ratio: Jurisdictions indicated that the most common impact of an imbalance between low-wage workers and affordable housing is high housing cost burden for residents (see Figure 2). The majority of respondents also noted impacts on employers and workers in their jurisdictions, with 38 respondents (53%) stating that the imbalance between low-wage workers and affordable housing results in long commutes into the jurisdiction and hinders employers' ability to hire or retain workers. Beyond the options listed on the survey, respondents wrote that displacement and overcrowding are also local issues related to an imbalance in jobs-housing fit.

Usefulness of jobs-housing fit data: 51% of respondents indicated their jurisdiction uses jobs-housing fit data to inform policy decisions, including:

- Updating Housing Elements, General Plans, and other long-range plans
- Revising land use policies, such as industrial zoning
- Approving development projects
- Recruiting new businesses
- Designing affordable housing policies such as inclusionary zoning, commercial linkage fees, and rent stabilization

Jurisdictions that do not use jobs-housing fit data explained why this data is not as relevant to their communities. Some noted a jobs-housing balance metric is more useful, particularly in communities where there is more housing relative to jobs. Others noted that more data collection is needed to examine jobs-housing fit issues in their jurisdiction. Lastly, some felt other data are more relevant for housing affordability issues, such as comparing overall housing cost

Figure 3. If your jurisdiction experiences an imbalance in the jobs-housing fit for low-wage workers, which of the following policies, programs, or strategies would be most helpful for your jurisdiction to implement to help address this imbalance? (Question 6)

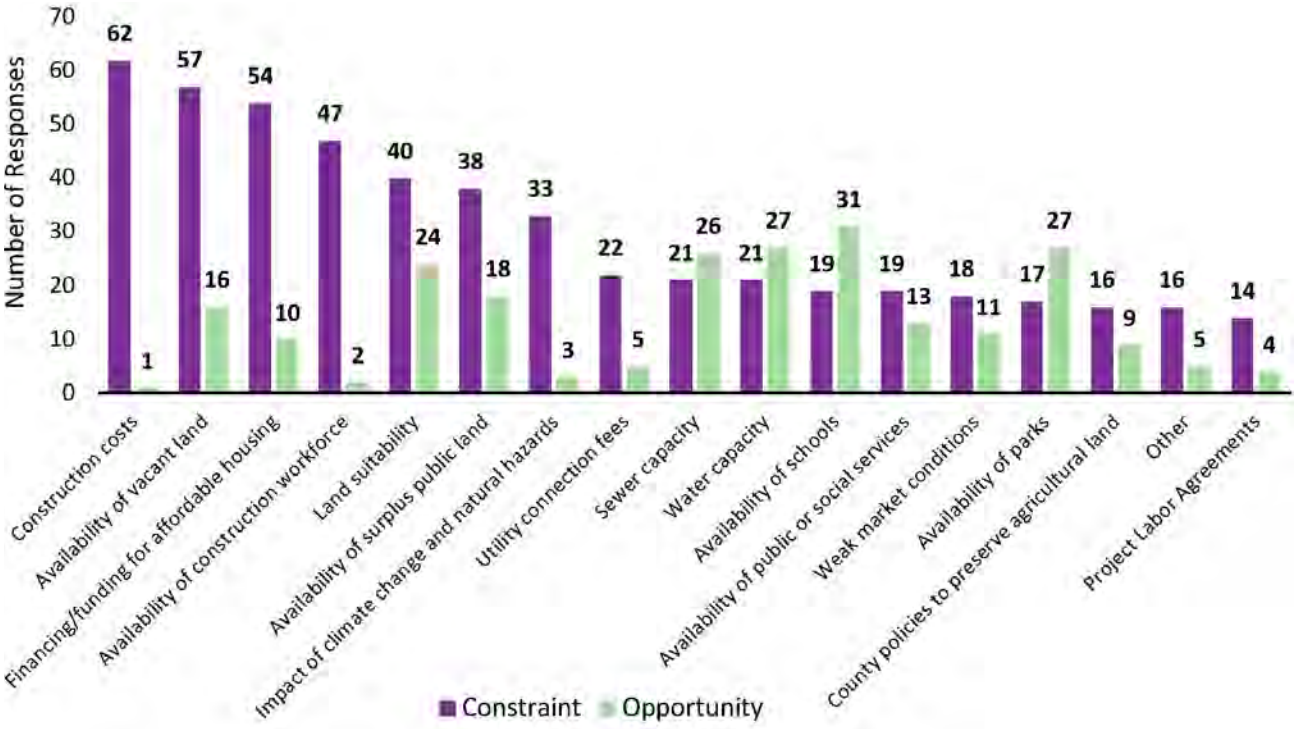


and wage data. The HMC can take these comments into account when considering jobs-housing fit as a factor in the RHNA methodology. The survey results indicate using jobs-housing fit as a RHNA factor would align with policymaking in many jurisdictions, but there are also other data sources that could potentially be a factor for the relationship between jobs, housing, and affordability.

Strategies for addressing jobs-housing fit imbalance: Jurisdictions focused on policies to produce and preserve affordable housing to address a jobs-housing fit imbalance (see Figure 3). Increased funding for affordable housing received the most support from respondents (76%) followed by inclusionary zoning (41%) and community land trusts (23%). Beyond the options listed on the survey, jurisdictions commented that they support the following strategies:

- Policies to encourage production of ADUs and allow for rent-restrictions in ADUs

Figure 4. Which of the following apply to your jurisdiction as either an opportunity or a constraint for development of additional housing by 2030? (Question 7)



- Increased housing density
- Policies to incentivize affordable housing production, such as density bonuses
- Funding to acquire and preserve affordable housing that currently exists on the market without subsidy

Topic 2: Relationship Between Jobs and Housing

The seven questions within this topic area focused on factors within jurisdictions that create opportunities or constraints for developing more housing. These questions also focus specifically on opportunities and constraints for encouraging jobs and housing near transit, developing housing near job centers, and minimizing greenhouse gas emissions.

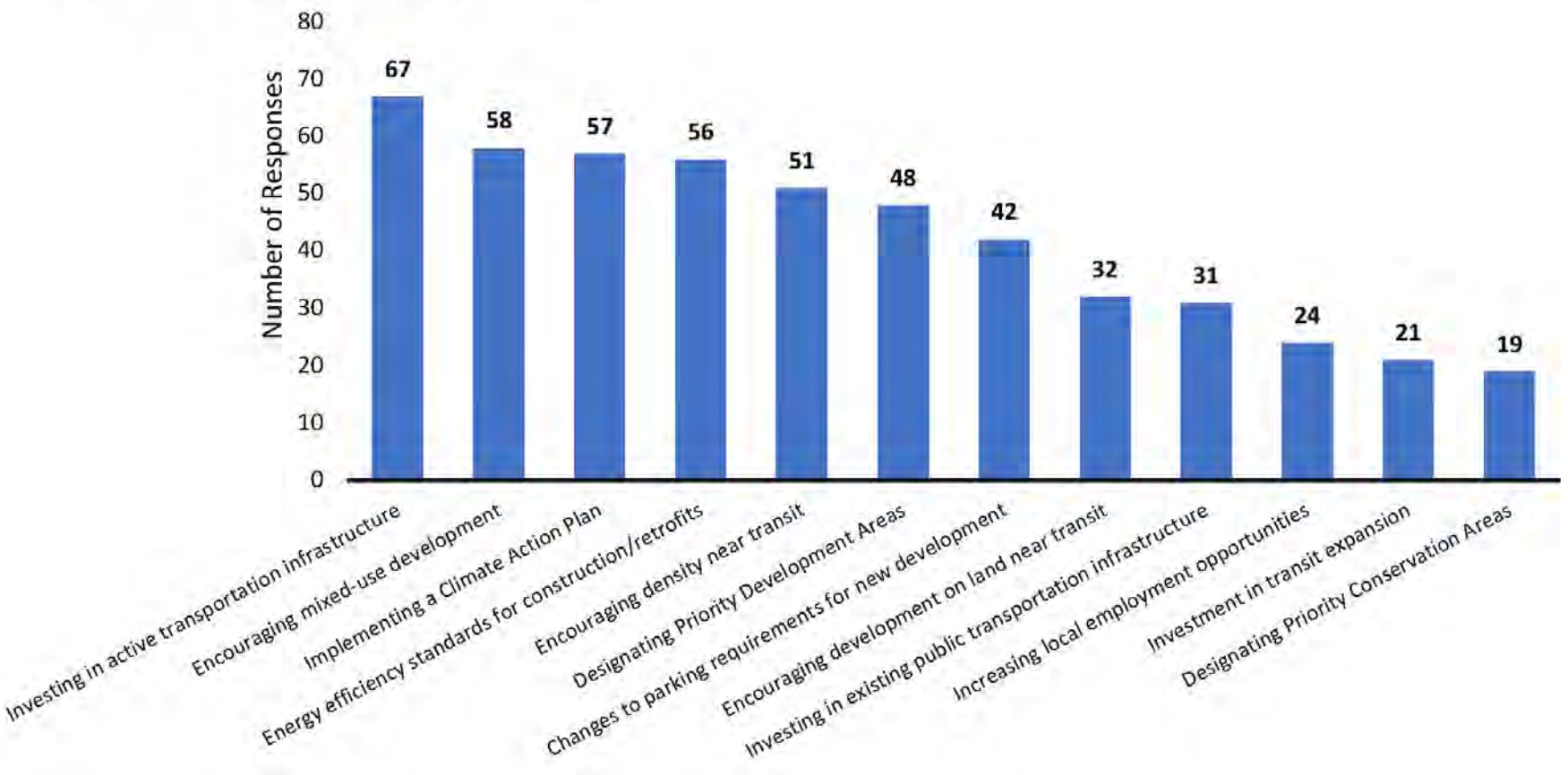
Key Takeaways from Respondents' Comments

Opportunities and constraints for developing housing: Jurisdictions' constraints for developing new housing centered on issues related to costs and land. Nearly all respondents (87%) cited construction costs as a constraint (see Figure 4 on page A57). Other constraints reported by more than 50% of jurisdictions were the availability of vacant land, funding for affordable housing, availability of construction workforce, land suitability, and availability of surplus public land. There was less of a regional consensus around opportunities for developing housing, with no single factor being cited as an opportunity by most respondents. Factors considered to be opportunities related largely to infrastructure and community amenities, with the most common opportunities being the availability of schools, availability of parks, water capacity, and sewer capacity. These four factors were also the only factors listed more commonly as opportunities than as constraints.

Opportunities and constraints for encouraging housing near transit and jobs: 57 jurisdictions (80%) stated they encounter opportunities or constraints in encouraging jobs and housing near existing transportation infrastructure, while 50 (70%) reported having opportunities or constraints for encouraging housing near job centers. In their responses to these questions, jurisdictions reported a mix of both opportunities and constraints for developing housing near jobs and transit, with some respondents noting that both opportunities and constraints exist simultaneously in their jurisdictions. Jurisdictions in Alameda, Contra Costa, Marin, Napa, and San Mateo counties noted that specific plans for areas around bus and rail transit centers provide opportunities for greater density and mixed-use development near transportation infrastructure, which can encourage housing near jobs and transit. Similarly, jurisdictions in Santa Clara County discussed how rezoning efforts near job centers can create opportunities for more housing near jobs.

Some of the obstacles listed by jurisdictions echo what was mentioned in the previous questions related to opportunities and constraints for developing housing in general: limited vacant land, high construction costs, and construction labor shortage. Additionally, jurisdictions throughout the region stated that a lack of existing transit service prevents them from encouraging jobs and housing near public transportation infrastructure. Likewise, respondents across the region also noted that their jurisdictions lack job centers, which prevents them from locating housing near jobs. Lastly, some jurisdictions noted that while they do have job centers, the land near these jobs is not zoned to allow for residential construction.

Figure 5. What land use policies or strategies has your jurisdiction implemented to minimize greenhouse gas emissions? (Question 13)



APPENDIX 8

Strategies for reducing greenhouse gas (GHG) emissions: Seven of the policies listed in this question have been adopted by a majority of respondents. The most widespread strategy (94% of respondents) is investing in active transportation infrastructure to support biking and walking (see Figure 5 on page A59). Other popular strategies for reducing GHG emissions include encouraging mixed-use development and density near transit, adopting energy efficiency standards for new construction, designating Priority Development Areas, and changing parking requirements. This information could potentially assist staff and the HMC in designing a RHNA methodology that satisfies the statutory objective to encourage efficient development patterns and achieve GHG reduction targets.

Topic 3: Housing Affordability and Overcrowding

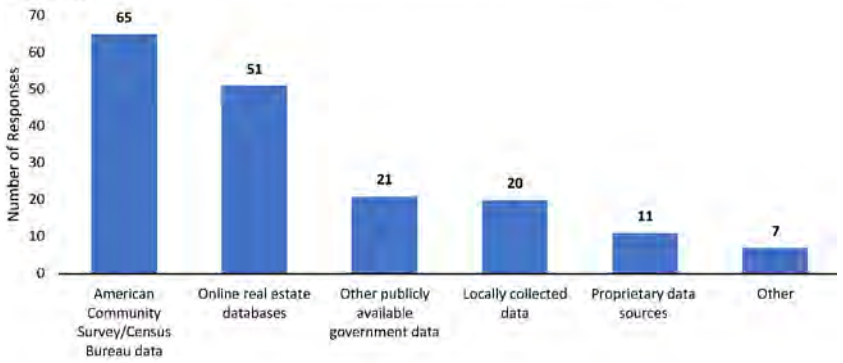
The eight questions within this topic area discussed issues jurisdictions face related to high housing costs, data jurisdictions use to assess these issues, and barriers that jurisdictions face in meeting their RHNA targets for lower-income households.

Key Takeaways from Respondents' Comments

Policymaking related to housing costs and overcrowding: 51 respondents (72%) have considered impacts of housing costs and high rates of rent burden[4] on residents. However, only 33 respondents (46%) stated they have considered the impacts of overcrowding on residents. Specifically, jurisdictions noted they examine issues related to housing costs and overcrowding when updating their Housing Elements, completing Consolidated Planning processes required by HUD, and creating affordable housing policies such as inclusionary zoning and rent stabilization.

Data collection on housing costs and homelessness: Jurisdictions largely rely on Census Bureau data (65 respondents, 92%) and online real estate databases, such as Zillow or Trulia (51 respondents, 72%), to examine housing costs (see Figure 6). 30% of jurisdictions reported using publicly available data sources in addition to Census Bureau data, which included the county assessor's database, California Department of Finance data, HUD's CHAS dataset, and data provided by ABAG. Approximately 30% of respondents also reported using locally collected data such as building permit records, local rental registries, and local surveys of landlords, apartment communities, and first-time homebuyers. Lastly, about 15% of respondents use

Figure 6. What data sources does your jurisdiction use to examine local trends in housing costs? (Question 16)



4 *HUD defines households as rent-burdened if they spend more than 30% of their income on rent. For more information on this measure, see https://www.huduser.gov/portal/pdredge/pdr_edge_featd_article_092214.html.*

proprietary data sources to examine housing costs, which include products like CoStar, RealQuest, DataQuick, and Axiometrics.

The vast majority of respondents noted that housing costs in their jurisdiction are increasing. However, a few jurisdictions stated that prices have been stabilizing in the past year after increasing sharply in recent years, while two jurisdictions reported that rental prices declined in the past year. Also, a few jurisdictions stated that prices of for-sale homes have leveled off while rents continue to rise. In terms of data collection on homelessness, 40 respondents (56%) indicated their jurisdictions collect data on the occurrence of homelessness within their boundaries. Nearly all these jurisdictions noted their data collection on homelessness is a part of bi-annual countywide efforts related to the Point-in-Time counts required by HUD.

Barriers to meeting lower-income RHNA goals: The most common barriers to affordable housing production identified by survey respondents were gap financing and land availability. Both of these obstacles were selected by 50 respondents (70%), while no other barrier was selected by the majority of respondents

Figure 7. What are the primary barriers or gaps your jurisdiction faces in meeting its RHNA goals for producing housing affordable to very low- and low-income households? (Question 19)

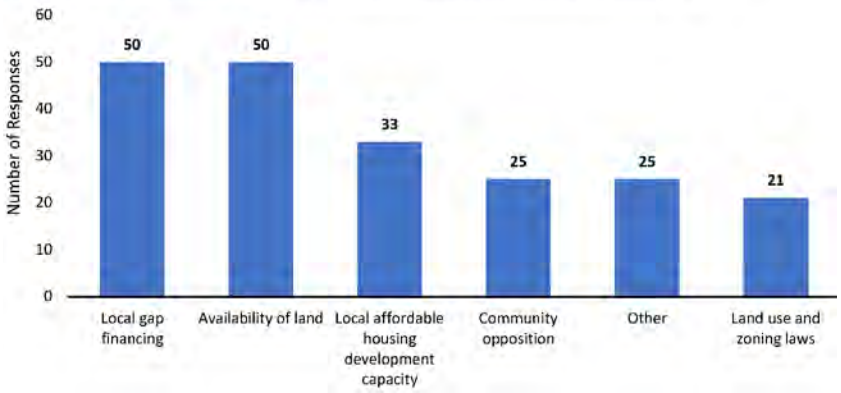
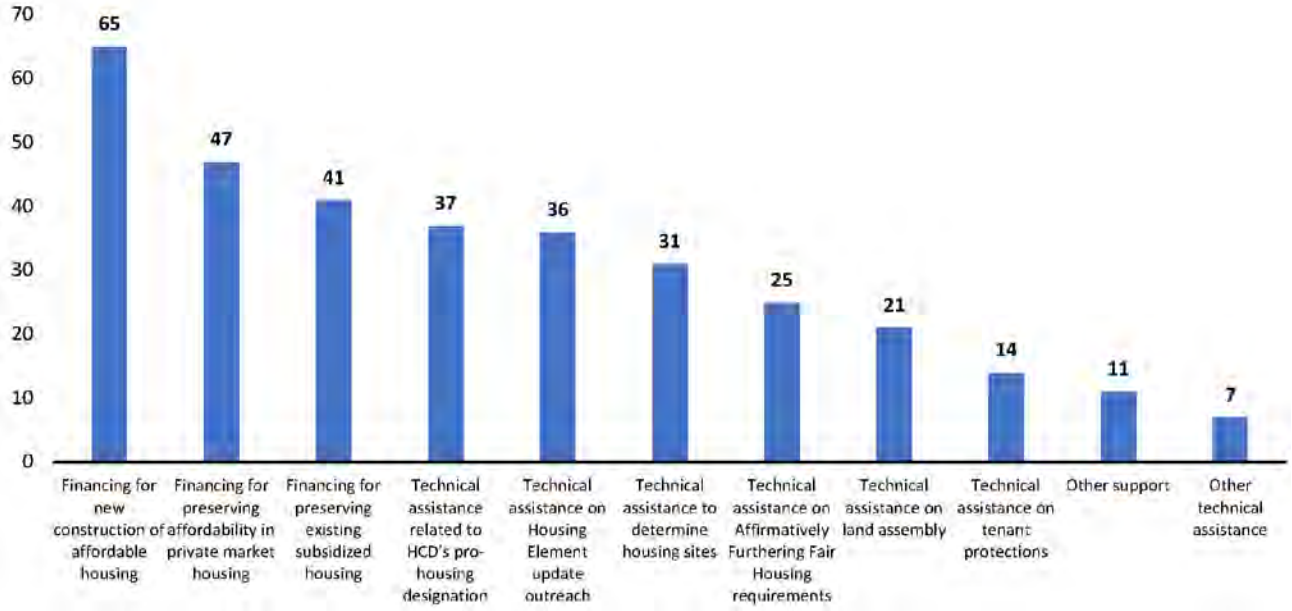


Figure 8. What types of support would your jurisdiction like to see the Bay Area Housing Finance Authority (BAHFA) provide to help your jurisdiction meet its RHNA goals and comply with the requirement to affirmatively further fair housing? (Question 21)

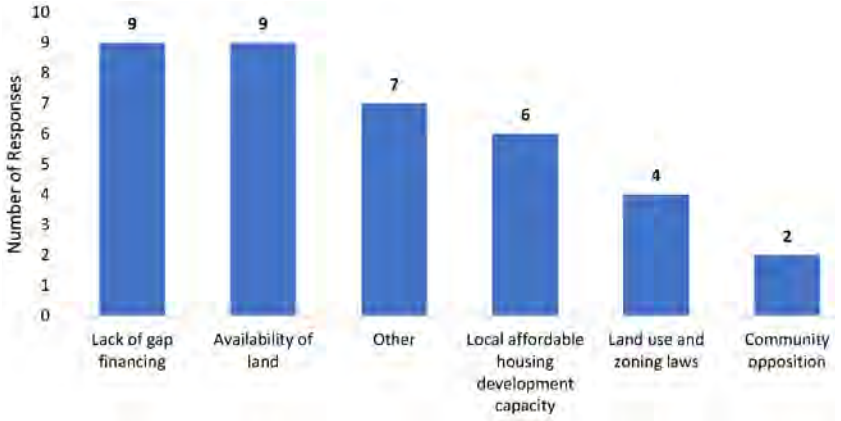


(see Figure 7 on page A61). Other barriers identified by respondents were similar to factors mentioned in earlier questions related to obstacles to housing development generally, such as construction costs and high prices for land, materials, and labor. Respondents also mentioned a lack of funding and staff resources for the implementation of affordable housing programs, particularly due to the dissolution of redevelopment agencies.

Additionally, 20 respondents provided an estimate for how many affordable units could be built in their jurisdictions if ample gap financing was available. In total, these 20 jurisdictions estimated that 12,000 units of housing affordable to low- and very low-income households could be built if they had the necessary funding. Similarly, multiple jurisdictions stated that they would be able to accommodate their entire low- and very low-income RHNA if given the gap financing to enable construction of these affordable units. Jurisdictions' estimates for the funding needed to build these units ranged from $200,000 to $500,000 per unit.

Similarly, jurisdictions indicated financing for constructing new affordable housing was the support they would most desire from the Bay Area Housing Finance Authority, with 65 jurisdictions (92%) selecting this option (see Figure 8 on page A61). Financing for preservation of both subsidized affordable housing and affordable housing that exists on the market without subsidy were the next most popular options for financial support from BAHFA. Most jurisdictions also noted they would like technical assistance with complying with HCD's pro-housing designation and other state regulations, as well technical assistance for Housing Element outreach. ABAG staff may be able use the information provided from local

Figure 9. If your jurisdiction is not currently meeting the demand for farmworker housing, what are the main reasons for this unmet demand? (Question 24)



jurisdictions for designing the technical assistance programs that will be provided as part of the Regional Early Action Planning grants program.

Topic 4: Housing Demand

The 15 questions within this topic area focused on demand for housing created in jurisdictions by farmworkers, nearby postsecondary educational institutions, the loss of subsidized housing units due to expiring affordability contracts, and state-declared emergencies.

Key Takeaways from Respondents' Comments

Housing needs for the region's farmworkers: Only 16 respondents (23%) identified a need for farmworker housing in a typical year. Of those, six provided an estimate of local housing need for farmworkers, which totaled approximately 5,000 units. Data sources for estimates included interviews with farmworkers and farm owners, the USDA Census of Agriculture, Napa County Farmworker Housing Needs

Assessment, Santa Clara County Planning Department survey, and the California Employment Development Department. The most common barriers to meeting demand for farmworker housing are similar to barriers to developing affordable housing generally. Among the 16 respondents with a need for farmworker housing, the most common barriers are a lack of financing and limited availability of land (see Figure 9 on page A62).

Housing demand created by postsecondary educational institutions: Responses to questions about housing demand created by postsecondary educational institutions indicate a need for better data collection on this issue. Only 8 respondents (11%) were able to provide an estimate for this housing need. Several more jurisdictions indicated there is significant housing demand created by nearby postsecondary educational institutions, but the number of housing units needed to meet this demand is unknown. The eight jurisdictions that were able to estimate the housing demand created by postsecondary educational institutions stated that the data for their estimates came from surveys conducted by these institutions, but several more jurisdictions indicated they have not been able to obtain this information from local colleges and universities.

Loss of subsidized affordable housing: 19 respondents (27%) stated their jurisdictions had lost subsidized affordable housing units in the past 10 years due to expiring affordability contracts or other issues facing at-risk affordable housing units. Most of the data for these responses came from internal sources. Jurisdictions noted their awareness of affordable housing built with redevelopment funds that converted to market-rate due to expiring regulatory agreements, and respondents also stated they were aware of below-market-rate units built through inclusionary housing programs that had lapsing affordability requirements.

A larger number of respondents expected to lose affordable housing units in the next 10 years, with 23 respondents (32%) noting that they anticipated these future losses. These respondents also referred to internal city records that indicated the pending expiration of regulatory agreements. Notably, one jurisdiction stated that 68% of existing below-market-rate rental units in its Below Market Rate Housing Program are set to expire in 10 years. Additionally, another respondent commented that the number of affordable units owned by for-profit owners in their jurisdiction is high according to research by the California Housing Partnership, which indicates a high risk for losing these affordable units in the future.[5]

These survey responses indicate that helping cities prevent the loss of affordable housing because of expiring affordability requirements could be a potential focus of ABAG's Regional Early Action Planning grants program. Additionally, the variety of data on at-risk affordable units collected by both individual jurisdictions and the California Housing Partnership points to a need to compile this data if the HMC were to consider using the loss of affordable units as a RHNA methodology factor.

Loss of housing units due to state-declared emergencies: Only six respondents (8%) stated their jurisdiction had lost housing units during a state-declared emergency (such as a fire or other natural disaster) that have not been rebuilt. These

5 *For more information on the California Housing Partnership's research on at-risk affordable housing in California, see https://1p08d91kd0c03rlxhmhtydpr-wpengine.netdna-ssl.com/wp-content/uploads/2020/02/2020-Affordable-Homes-at-Risk_CHPC-Final.pdf.*

jurisdictions are in Napa, San Mateo, Santa Clara, Solano, and Sonoma counties. Two jurisdictions in Sonoma County were able to provide precise data on the number of units lost in recent fires. Another Sonoma County jurisdiction noted that they did not lose any housing in the fire but have experienced increased demand in housing because of lost units in surrounding communities. Additionally, two jurisdictions in Marin County noted that, while they have not lost units recently, they expect that units lost in the future due to sea level rise and increased flooding may not be replaced.

SECTION 2: SUMMARY OF RESPONSES TO FAIR HOUSING QUESTIONS

The data and information collected in the Local Jurisdiction Survey can help Bay Area jurisdictions understand the framework needed for assessing fair housing issues, which state law now requires for the next Housing Element update in 2022. Notably, several jurisdictions reported in the survey that they lack data on segregation patterns and have not previously set goals in their Housing Elements related to removing barriers to housing choice. However, this type of analysis will likely be needed for the upcoming Housing Element update.

Accordingly, the survey results can help ABAG staff identify assistance that they can offer through the Regional Early Action Planning (REAP) grants program to help local jurisdictions comply with new Housing Element requirements. Additionally, both the Local Jurisdiction Survey and the review of Bay Area jurisdictions' fair housing reports to HUD identified regional themes regarding both barriers to fair housing choice and strategies to further fair housing. This knowledge can inform how ABAG designs technical assistance and grant programs in the future to help local jurisdictions implement successful fair housing strategies.

Topic 1: Fair Housing Planning and Data Sources

The eight questions in this topic area centered on jurisdictions' processes for assessing fair housing issues in their communities. Federal law obligates jurisdictions receiving block grant funding from HUD to submit a Consolidated Plan to HUD every five years, and this process requires jurisdictions to assess local fair housing issues (see Section 3 for more details on federally mandated fair housing reporting). While the Local Jurisdiction Survey did ask whether jurisdictions currently submit fair housing reports to HUD, all questions on the survey could be applicable to jurisdictions regardless of whether they participate in federal fair housing reporting. This portion of the survey also asked about the data jurisdictions use for fair housing planning and the efforts they have made to elicit public participation in their fair housing planning processes.

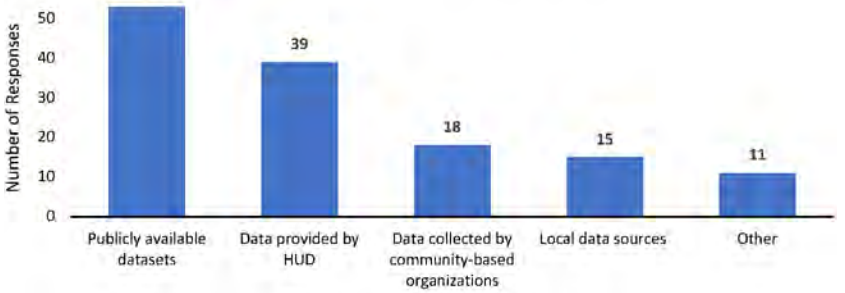
Key Takeaways from Respondents' Comments

Fair housing reporting to HUD: According to the results of the local jurisdiction survey, 37 respondents (51%) have submitted a fair housing report to HUD. Because these reports are submitted as part of five-year planning cycles, most of these jurisdictions recently submitted a report for the years 2020-2025 or are currently working on a report for this cycle, though a few jurisdictions' Consolidated Plans are on a different timeline. While some reports are submitted to HUD by individual jurisdictions, this reporting can also be completed as a collaborative effort between a county government and local jurisdictions within the county.

Data sources for fair housing planning processes:
Jurisdictions primarily rely on publicly available datasets (e.g. data from the Census Bureau) to assess fair housing issues, with 74% of respondents indicating they use this data source. The other data source that a majority of respondents reported using was data provided by HUD (see Figure 10). In addition to the options listed on the survey, respondents noted that they collect and maintain various data sources to inform fair housing planning, including rental vacancy surveys, inventories of affordable housing, landlord registries, code enforcement complaints, surveys of residents, and data from community outreach. Beyond the data collected by jurisdictions themselves, respondents also discussed using data collected by local nonprofits providing fair housing services as well as analyses prepared by county governments and Public Housing Agencies.

Community participation in fair housing processes:
Jurisdictions were most likely to use public forums to incorporate community participation in their fair housing planning, with open house community meetings (54%) and public hearings (49%) being the most common outreach activities reported by respondents. Respondents were also likely to solicit information directly from residents, with 46% using resident surveys and 39% using resident focus groups. Additionally, 40% of respondents reported consulting with stakeholder groups during fair housing planning processes (see Figure 11 on page A66). Based on information respondents shared in their surveys, jurisdictions most often worked with the following types of stakeholder groups:

Figure 10. Which of the following data sources does your jurisdiction maintain or use to assess fair housing issues in the community? (Question 39)



- School districts
- Faith-based groups
- Community-based organizations and neighborhood associations
- Advocacy organizations representing the following constituencies:
  - People of color
  - People with disabilities
  - Immigrants and people with limited English proficiency
  - Seniors
  - Youth
- Affordable housing providers and residents
- Homelessness services providers
- Housing Choice Voucher applicants
- Nonprofits providing fair housing services
- Legal aid organizations
- Healthcare and social services providers

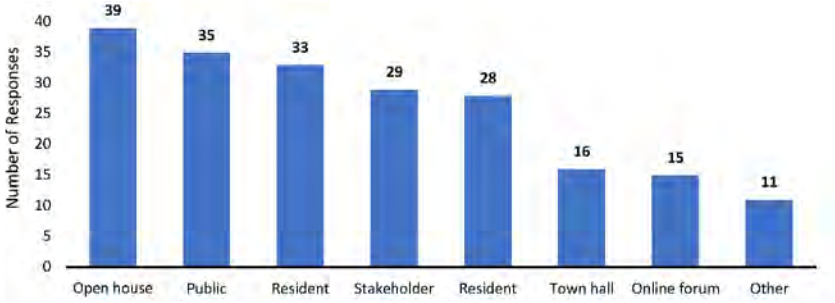
15 respondents noted that they collected demographic information for community members who participated in the fair housing planning process. This demographic data typically included data on participants' racial/ethnic background, English language proficiency, age, income, household size, and housing situation.

The survey also provided respondents with an opportunity to discuss their goals for the community outreach process and their success with achieving these goals. According to the survey responses, jurisdictions' goals for community outreach during fair housing planning can be summarized as the following:

- Gather input from a broad and diverse range of residents and community groups.
- Encourage participation from those most impacted by fair housing issues.
- Engage community members who may face barriers to participation, such as those with limited English proficiency.
- Build trust with community members and encourage future participation in planning processes.
- Ensure that federal fair housing reports and other housing planning processes reflect community conditions.
- Obtain data to effectively assess fair housing barriers.
- Develop targeted and feasible fair housing goals and strategies for achieving them.

Respondents indicated that they were largely successful in achieving their goals for community outreach during fair housing planning (see Figure 12 on page A67). Notably, one-third of respondents did not answer this question, which could

Figure 11. Which of the following outreach activities has your jurisdiction used to encourage community participation in planning processes related to fair housing? (Question 40)



indicate a hesitancy to comment on the success of community outreach efforts. It is also possible that jurisdictions who do not engage in planning processes explicitly focused on fair housing skipped this question rather than selecting "N/A." Respondents who did answer also described the reasons their jurisdictions were able to achieve their goals for the community outreach process as well as the factors that inhibited success with these goals. Table 2 on page A67 provides a summary of these reasons.

Topic 2: Diversity/Segregation, Access to Opportunity, and Housing Needs

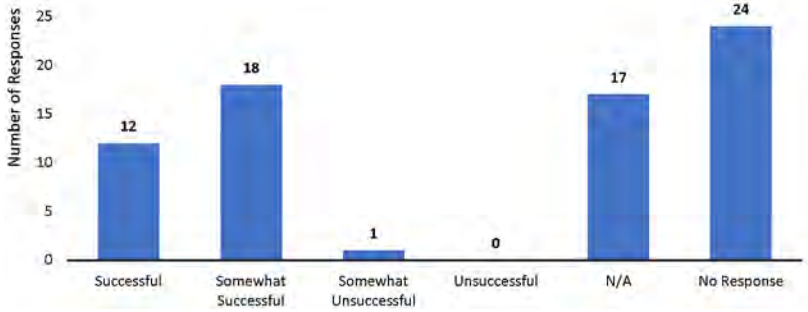
The two questions within this topic area focused on the conditions that restrict fair housing choice and access to opportunity in Bay Area jurisdictions. These questions focused on four fair housing issues: limited access to housing in a jurisdiction, segregated housing patterns and concentrated areas of poverty, disparities in access to opportunity, and disparities in housing cost burdens and overcrowding. The survey sought to contextualize respondents' answers by providing each respondent with data specific to their jurisdiction on geographic concentrations of

poverty and race-based disparities in access to opportunity, housing cost burden, overcrowding, and segregated housing patterns. For more information on the impediments to fair housing that Bay Area jurisdictions have described in their fair housing reports to HUD, see Section 3.

Key Takeaways from Respondents' Comments

Factors contributing to fair housing issues: Respondents

Figure 12. How successful was your jurisdiction in achieving its goals for the process to elicit community participation for fair housing planning? (Question 43)



most commonly reported that fair housing issues in their jurisdictions stem from factors related to displacement, affordable housing, and barriers to development (see Table 3 on page A69, which shows how many respondents indicated whether a factor contributes to each of the four fair housing issues). When the factors are ranked in terms of which were selected by the most jurisdictions for each fair housing issue, there are three factors among the five most selected across all four fair housing issues: community opposition to development, displacement due to increased rents, and displacement of low-income and/or person-of-color (POC)

Table 2. Describe the reasons for the success or lack of success of your jurisdiction's community engagement efforts. (Question 44)

FACTORS ENABLING SUCCESS IN ACHIEVING COMMUNITY OUTREACH GOALS:	FACTORS PREVENTING SUCCESS IN ACHIEVING COMMUNITY OUTREACH GOALS:
• Reaching out to a diverse group of community stakeholders • Effective marketing efforts that broadly distributed information throughout the community • Dedicated staff and resources for the outreach and engagement process • Multiple opportunities to participate throughout engagement process • Variety of ways to participate in multiple settings (online surveys, community meetings, small group discussions, etc.) • Partnerships with nonprofit organizations providing fair housing services	• Event attendees disproportionately from certain segments of the community, such as long-term homeowners • Difficulty engaging populations with less housing stability, such as renters or people experiencing homelessness • Outreach does not reflect opinions of those who have been excluded from the community due to high cost of housing • Lack of housing staff and resources • Need for a variety of participation formats as well as more outreach online and using social media • Limited time for completing a robust outreach process • Residents lacking time and resources to participate in community meetings • Lack of childcare provided at meetings • Confusion about the fair housing topics discussed at meetings

residents. Two other factors ranked in the top five for three out of four of the fair housing issues: availability of larger affordable units and land use/zoning laws. These five factors are highlighted in Table 3 on following pages.

The survey results show the most consensus around factors contributing to limited access to housing in jurisdictions as well as disparities in housing cost burdens and overcrowding. 32 respondents (44%) indicated that the availability of larger affordable units contributes to a lack of access to housing in their jurisdiction. Additionally, displacement due to increased rents, displacement of low-income residents and/or residents of color, and community opposition to development were all listed by more than one-third of jurisdictions as contributing to limited housing access. These same four factors were also the most commonly indicated causes of disparities in housing cost burdens and overcrowding, with 42% of respondents stating that displacement due to increased rents contributes to these disparities.

For the issues of segregated housing patterns/concentrated areas of poverty and disparities in access to opportunity areas, no contributing factor was selected by more than 12 respondents (17%). However, respondents did report similar causes for these fair housing issues: displacement due to increased rents, displacement of low-income residents and/or residents of color, community opposition to development, location of affordable housing, and availability of larger affordable units.

Respondents were also asked to select the top three factors contributing to fair housing issues in their jurisdiction and to describe the reason for these selections. Below are the factors most commonly listed by jurisdictions as the main contributors to fair housing issues as well as a summary of why respondents selected these factors. The factors appear in order of how frequently they were cited by respondents as top contributors to fair housing issues, with the most frequently listed factors first.

- **Displacement:** Respondents noted that displacement disproportionately affects low-income residents and residents of color, which can result in disproportionate overcrowding for these populations. Additionally, the rising housing costs in communities affected by displacement limit opportunities for racial and socioeconomic diversity and integration.
- **Community opposition to development:** Respondents reported that residents commonly oppose denser housing, affordable housing, or housing with supportive services for formerly homeless residents. This opposition can significantly increase the time to approve new development and drives up costs for both affordable and market-rate projects.
- **Lack of affordable housing, especially larger units:** Respondents described how rising housing costs and a limited supply of affordable housing cause the displacement of low-income residents and prevent low-income households from moving into communities.
- **Land use and zoning laws:** Some respondents noted

Table 3. Which of the following factors contribute to fair housing issues in your jurisdiction? Check all that apply. (Question 45)

Factors Contributing to Fair Housing Issues	FAIR HOUSING ISSUES			
	Disparities in access to opportunity areas	Segregated housing patterns or concentrated areas of poverty	Disparities in access to opportunity areas	Disparities in housing cost burdens and overcrowding
Access to financial services	5	1	1	1
Access to grocery stores and healthy food options	3	4	7	2
Access to healthcare facilities and medical services	3	2	2	2
****Availability of larger affordable units**	32	9	9	18
Availability, frequency, and reliability of public transit	20	5	8	6
CEQA and the land use entitlement process	14	4	6	6
****Community opposition to development**	24	10	9	15
Creation and retention of high-quality jobs	8	0	5	7
Deteriorated/abandoned properties	2	2	0	3
****Displacement due to increased rents**	30	11	9	30
Displacement due to natural hazards	3	1	1	4
****Displacement of low-income/POC residents**	25	12	11	24
Foreclosure patterns	2	3	2	4
Impacts of natural hazards	8	1	2	3
Lack of community revitalization strategies	2	3	2	3
Lack of private investments in low-income/POC communities	6	6	6	5
Lack of public investments in low-income/POC communities	4	3	4	2

Continued next page

** Factors highlighted in bold with asterisks (**) are among the five most commonly selected across fair housing issues.*

Table 3. Which of the following factors contribute to fair housing issues in your jurisdiction? Check all that apply. (Question 45)

Factors Contributing to Fair Housing Issues	FAIR HOUSING ISSUES			
	Disparities in access to opportunity areas	Segregated housing patterns or concentrated areas of poverty	Disparities in access to opportunity areas	Disparities in housing cost burdens and overcrowding
Lack of regional cooperation	7	2	6	6
****Land use and zoning laws**	20	10	7	9
Lending discrimination	2	2	2	4
Location of affordable housing	16	11	8	7
Location of employers	8	2	3	8
Location of environmental health hazards	2	2	0	2
Location of proficient schools and school assignment policies	3	5	6	4
Occupancy standards limiting number of people per unit	4	0	0	3
Private discrimination	4	2	2	3
Range of job opportunities available	7	0	5	5
Other	2	0	1	1

that their jurisdictions are zoned primarily or entirely for single-family housing, and respondents also mentioned restrictions on multi-family development created by minimum lot sizes, density caps, height limits, and/or minimum parking requirements. These respondents reported that low-density zones cannot accommodate affordable housing, and current land use restrictions result in limited sites for multi-family projects. Consequently, affordable development is nearly impossible in some jurisdictions, while in other jurisdictions affordable developments are concentrated in the few areas with denser zoning. As a result, current land use and zoning codes perpetuate the segregation created by decisions of the past.

- Barriers to development: In addition to community opposition and land use laws, respondents described other barriers to development such as the availability of land suitable for development, the California Environmental Quality Act (CEQA) and the land use entitlement process, and the high cost of construction. Respondents discussed how their jurisdictions' approval processes for development and CEQA inhibit housing production. These respondents noted that CEQA slows down the entitlement

process and enables groups opposed to development to threaten litigation and create additional delays. The project costs created by CEQA and lengthy entitlement processes can make housing development financially infeasible, particularly for affordable projects. Survey responses indicated that these barriers to development inhibit access to these communities generally and especially for lower-income populations.

- **Location of employers:** Respondents discussed how limited job options within their jurisdictions and lack of access to job centers increase the costs of living there, as residents need to travel farther for work. Additionally, some mentioned that a lack of high-quality jobs within the jurisdiction prevents local jobholders from affording the high cost of housing.
- **Public transit availability:** Respondents suggested that a lack of public transit options inhibits those living in their jurisdiction from accessing jobs and services if they do not own a car, which makes the jurisdiction less accessible to a diverse range of households.

Topic 3: Fair Housing Goals and Actions

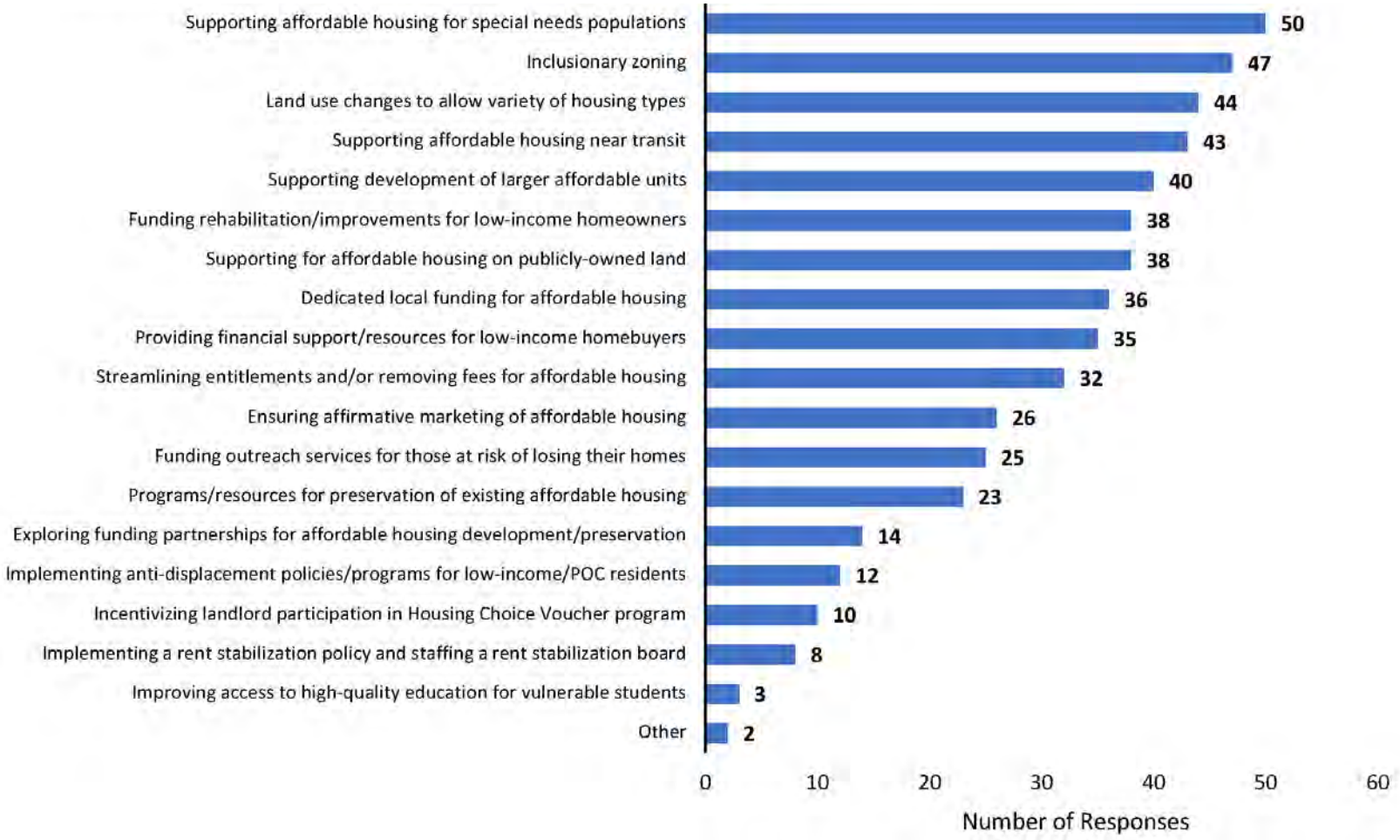
The four questions within this topic area discussed the actions jurisdictions have taken to remove barriers to equal housing opportunity and prevent the displacement of low-income households. Respondents were also asked to reflect on their goals for fair housing policies and whether the strategies they have implemented achieve these goals. For more information on the strategies to further fair housing that Bay Area jurisdictions have detailed in their fair housing reports to HUD, see Section 3.

Key Takeaways from Respondents' Comments

Policies and initiatives to further fair housing: The survey results indicate that there are eight actions that a majority of respondents have taken to address existing segregation and enable equal housing choice (see Figure 13 on page A72). Most of these actions center on increasing the number of affordable housing units. For example, 69% of respondents have supported the development of affordable housing for special needs populations such as seniors, people with disabilities, people experiencing homelessness, and/or those with mental health issues. The survey responses also indicate that most respondents have sought to increase the supply of affordable housing through inclusionary zoning, land use changes, developing affordable housing near transit, encouraging the construction of larger affordable units, using publicly owned land for affordable development, and establishing local funding sources for affordable housing construction. Other common strategies to advance fair housing focus on low-income homeownership, with 53% of respondents funding home rehabilitation and improvements for low-income homeowners and 49% of respondents providing resources to support low-income homebuyers.

Goals for fair housing policies: Many of the jurisdictions' survey responses noted that a goal of their fair housing policies is facilitating equal housing opportunities by removing barriers to affordable housing. Specifically, respondents discussed the following objectives for their fair housing policies related to increasing the affordable housing supply:

Figure 13. What actions has your jurisdiction taken to overcome historical patterns of segregation or remove barriers to equal housing opportunity? (Question 47)



- Financing affordable housing development through linkage fees and dedicated funding sources.
- Creating new affordable units and mixed-income development using inclusionary requirements for market-rate development.
- Providing support for nonprofit affordable housing developers.
- Preserving the existing affordable housing stock.

Additionally, respondents mentioned the following goals related to overcoming historic patterns of segregation and eliminating barriers to equal housing choice:

- Expanding affordable housing and homeownership

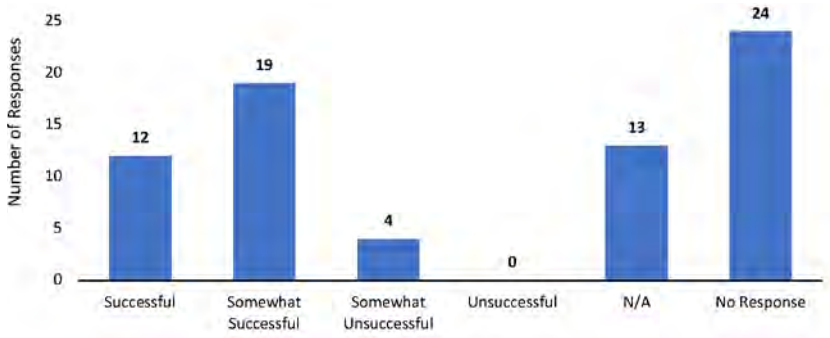
opportunities for those who have been directly affected by the historic legacies of housing inequities and discrimination.

- Ensuring that affordable housing is spread throughout all communities.
- Creating affordable housing options in high opportunity neighborhoods.
- Increasing the diversity of housing types throughout all neighborhoods through land use changes.
- Reducing barriers to mobility for low-income households and residents of publicly-supported housing.
- Making fair housing resources more readily available online and coordinating with fair housing services nonprofits to disseminate information and reduce discrimination.

Respondents reported that their jurisdictions' policies and actions were mostly successful for achieving goals related to furthering fair housing (see Figure 14). Notably, one-third of respondents did not answer this question, which could indicate a hesitancy to comment on the success of efforts to further fair housing. It is also possible that jurisdictions who do not engage in planning processes explicitly focused on fair housing skipped this question rather than selecting "N/A." Respondents who did answer also discussed the reasons their jurisdictions were able to achieve fair housing goals as well as the factors that hindered the success of these efforts. Table 4 on page A74 provides a summary of these reasons.

Anti-displacement policies and initiatives in local jurisdictions: Jurisdictions throughout the region have adopted a variety of policies to prevent or mitigate the displacement of their low-income residents. The most common strategies focus on the production of affordable units as well as policies and programs to help low-income tenants remain in their current housing (see Figure 15 on page A75). 78% of respondents indicated that their jurisdictions promote streamlined processing for ADU construction. Other policies enacted by the majority of respondents include inclusionary zoning and condominium conversion regulations. Additionally, more than 40% of respondents assess affordable housing fees on residential and/or commercial development, while a comparable number of respondents provide support for fair housing legal services and/or housing counseling. It is worth noting that efforts to preserve subsidized and unsubsidized affordable units have been made by few jurisdictions, but these two strategies were selected by the most respondents as being of potential interest to the councils/

Figure 14. How successful were your jurisdiction's past actions in achieving goals for overcoming historical patterns of segregation or removing barriers to equal housing opportunity? (Question 49)



boards in their jurisdictions. In addition to the options listed on the survey, respondents reported that the following anti-displacement policies and programs have been implemented by their jurisdictions:

- Relocation assistance for tenants displaced due to code enforcement actions, condo conversion, and demolition of housing units for redevelopment

APPENDIX 8

Table 4. Describe the reasons for the success or lack of success of your jurisdiction's actions to overcome historical patterns of segregation or remove barriers to equal housing opportunity. (Question 49)

FACTORS ENABLING SUCCESS IN ACHIEVING FAIR HOUSING POLICY GOALS:	FACTORS PREVENTING SUCCESS IN ACHIEVING FAIR HOUSING POLICY GOALS:
• **Creation of new local funding sources for affordable housing** • **Construction of 100% affordable housing developments with local financial support** • **Streamlined approvals processes for development, particularly for affordable housing and ADUs** • **Production of new affordable housing through inclusionary zoning** • **Affordable housing opportunities are not limited to low-income neighborhoods** • **Rezoning and other policies implemented through Housing Element updates resulting in increased development of both market-rate and affordable units** • **Ongoing funding for fair housing services providers** • **Strong leadership, political will, and community support for policies that advance fair housing goals**	• **Available funding inadequate for meeting the demand for affordable housing and other housing services** • **Land prices, land availability, and construction costs hamper affordable housing construction** • **Development of affordable housing cannot keep pace with the need** • **Longer timeframe required to see the effects of efforts to deconcentrate poverty and make affordable housing available throughout all neighborhoods** • **Lack of private investment, particularly in historically marginalized communities** • **Lack of staff to work on policy development and implementation** • **Community opposition to policies related to furthering fair housing**

- Programs and land use regulations to preserve affordable housing in mobile home parks
- Just cause eviction protections
- Downpayment assistance programs for residents
- Partnering with land trusts to acquire foreclosed homes and other for-sale properties to make them available for low- and moderate-income homebuyers
- Assisting landlords with low-cost loans and grants for property improvements in return for keeping long-time residents in place

SECTION 3: SUMMARY OF BAY AREA LOCAL FAIR HOUSING REPORTS

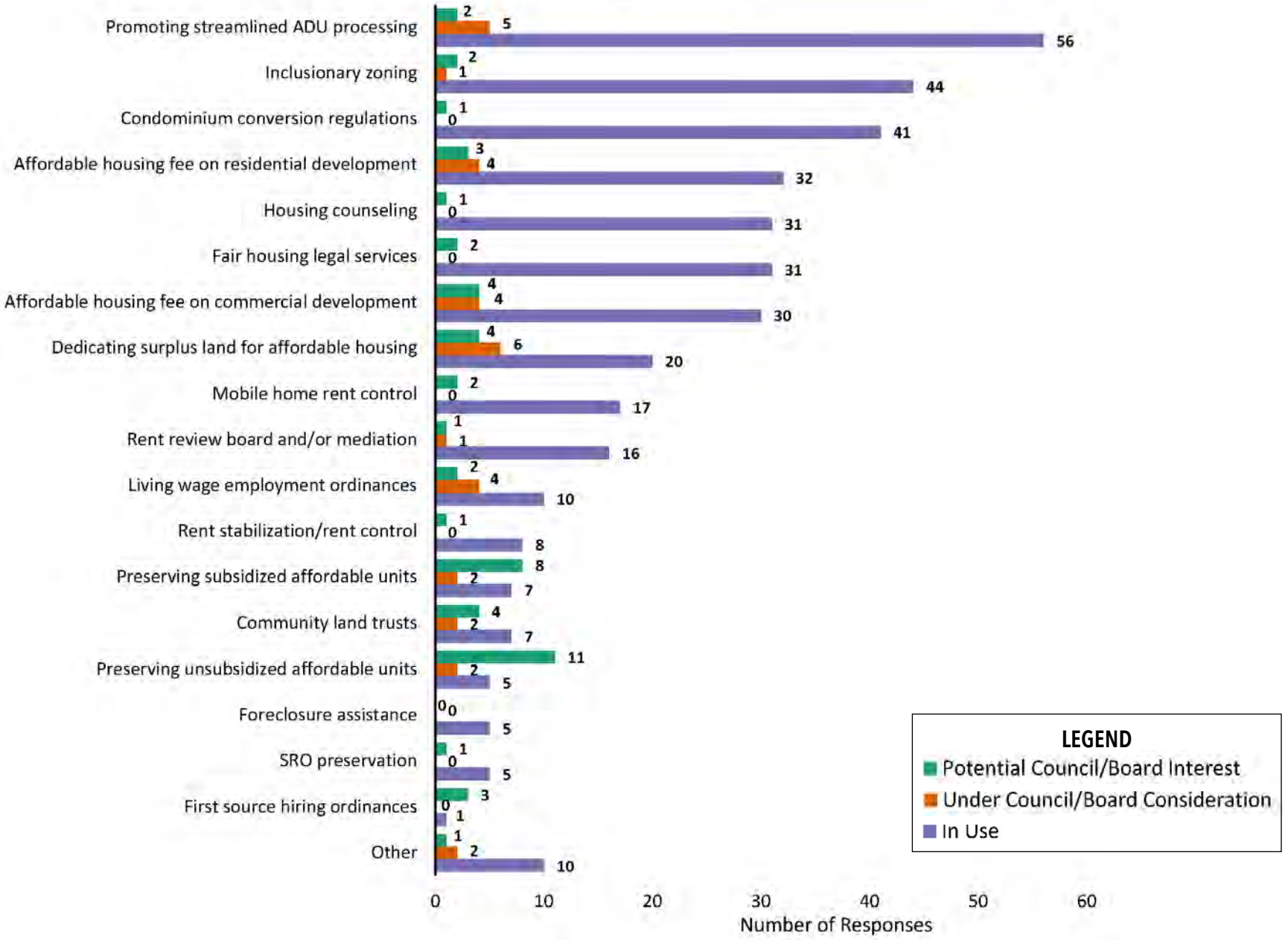
Federally Mandated Fair Housing Reports

Federal law obligates state and local jurisdictions receiving block grant funding from the HUD to submit a Consolidated Plan every five years, and this process requires conducting an Analysis of Impediments to Fair Housing Choice (AI).[1] In 2015, HUD released a final rule on affirmatively furthering fair housing (AFFH), which provided updated guidelines for assessing fair housing issues and created a new Assessment of Fair Housing (AFH) tool to replace the AI process. HUD's intent for this new process was to improve community planning around fair housing issues, as this new tool required public participation and increased data analysis.[2] In 2018, however, HUD suspended the AFH tool and reinstated the previous

6 See https://www.hudexchange.info/programs/consolidated-plan/consolidated-plan-process-grant-programs-and-related-hud-programs/ or more information on the Consolidated Plan process.

7 See https://files.hudexchange.info/resources/documents/AFFH-Fact-Sheet.pdf and https://www.hudexchange.info/programs/affh/overview/ for more information on the 2015 AFFH rule and AFH tool.

Figure 15. Which of the following policies, programs, or actions does your jurisdiction use to prevent or mitigate the displacement of low-income households? (Question 50)



requirement to complete an AI report.[3] In response to HUD's decision, the California legislature passed Assembly Bill 686 in 2018, which states that AFFH obligations must be interpreted in a manner consistent with HUD's 2015 AFFH rule, regardless of subsequent amendments to or suspensions of the rule.[4] As a result, some reports submitted by Bay Area jurisdictions for the 2020-2025 cycle are labeled AFH reports, while others are AI reports, but the content and format of reports submitted since the passage of Assembly Bill 686 are likely to be similar, regardless of whether the report is labeled an AI or AFH.

Bay Area Reports

Currently, 41 Bay Area cities and counties participate in the Consolidated Plan process and have submitted AI or AFH reports to HUD. Because these reports are submitted as part of five-year planning cycles, most of these jurisdictions recently submitted a report for the years 2020-2025 or are currently working on a report for this cycle, though reporting in some jurisdictions occurs on a different timeline. While some reports are submitted to HUD by individual jurisdictions, this reporting can also be completed as a collaborative effort between a county government and local jurisdictions within the county.

Below is a summary of the 16 AI and AFH reports, which are the most recently submitted fair housing documents from Bay Area jurisdictions available to the public. These reports cover the following jurisdictions:

- Programs and land use regulations to preserve affordable housing in mobile home parks
- Just cause eviction protections
- Downpayment assistance programs for residents
- Partnering with land trusts to acquire foreclosed homes and other for-sale properties to make them available for low- and moderate-income homebuyers
- Assisting landlords with low-cost loans and grants for property improvements in return for keeping long-time residents in place

SECTION 3: SUMMARY OF BAY AREA LOCAL FAIR HOUSING REPORTS

Federally Mandated Fair Housing Reports

Federal law obligates state and local jurisdictions receiving block grant funding from the HUD to submit a Consolidated Plan every five years, and this process requires conducting an Analysis of Impediments to Fair Housing Choice (AI).[5] In 2015, HUD released a final rule on affirmatively furthering fair housing (AFFH), which provided updated guidelines for assessing fair housing issues and created a new Assessment of Fair Housing (AFH) tool to replace the AI process. HUD's intent for this new process was to improve community planning around fair housing issues, as this new tool required public participation and increased data analysis.[6] In 2018, however, HUD suspended the AFH tool and reinstated the previous

8 See https://files.hudexchange.info/resources/documents/FR-Notice-AFFH-AI-Notice.pdf for the 2018 HUD notice.
9 See https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=201720180AB686 for text of Assembly Bill 686.
10 See https://www.hudexchange.info/programs/consolidated-plan/consolidated-plan-process-grant-programs-and-related-hud-programs/ or more information on the Consolidated Plan process.
11 See https://files.hudexchange.info/resources/documents/AFFH-Fact-Sheet.pdf and https://www.hudexchange.info/programs/affh/overview/ for more information on the 2015 AFFH rule and AFH tool.

requirement to complete an AI report.[7] In response to HUD's decision, the California legislature passed Assembly Bill 686 in 2018, which states that AFFH obligations must be interpreted in a manner consistent with HUD's 2015 AFFH rule, regardless of subsequent amendments to or suspensions of the rule.[8] As a result, some reports submitted by Bay Area jurisdictions for the 2020-2025 cycle are labeled AFH reports, while others are AI reports, but the content and format of reports submitted since the passage of Assembly Bill 686 are likely to be similar, regardless of whether the report is labeled an AI or AFH.

Bay Area Reports

Currently, 41 Bay Area cities and counties participate in the Consolidated Plan process and have submitted AI or AFH reports to HUD. Because these reports are submitted as part of five-year planning cycles, most of these jurisdictions recently submitted a report for the years 2020-2025 or are currently working on a report for this cycle, though reporting in some jurisdictions occurs on a different timeline. While some reports are submitted to HUD by individual jurisdictions, this reporting can also be completed as a collaborative effort between a county government and local jurisdictions within the county.

Below is a summary of the 16 AI and AFH reports, which are the most recently submitted fair housing documents from Bay Area jurisdictions available to the public. These reports cover the following jurisdictions:

- Alameda County collaborative report: the cities of Alameda, Albany, Berkeley, Dublin, Emeryville, Fremont, Hayward, Livermore, Newark, Oakland, Piedmont, Pleasanton, San Leandro, and Union City as well as Alameda County
- Contra Costa County collaborative report: the cities of Antioch, Concord, Pittsburg, and Walnut Creek as well as Contra Costa County
- Marin County
- City and County of San Francisco
- San Mateo County collaborative report: the cities of Daly City, San Mateo, South San Francisco, Redwood City, as well as San Mateo County
- Santa Clara County
- Sonoma County collaborative report: cities of Santa Rosa and Petaluma as well as Sonoma County
- City of Cupertino
- City of Fairfield
- City of Milpitas
- City of Mountain View
- City of Napa
- City of San Jose
- City of Sunnyvale
- City of Vacaville
- City of Vallejo

12 See https://files.hudexchange.info/resources/documents/FR-Notice-AFFH-AI-Notice.pdf for the 2018 HUD notice.
13 See https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=201720180AB686 for text of Assembly Bill 686.

APPENDIX 8

Reported Fair Housing Impediments, Strategies, and Actions

This summary focuses on common impediments to fair housing experienced by Bay Area jurisdictions, and it also lists specific strategies proposed and actions taken in response to these obstacles. While each AI or AFH report contains extensive city/county demographic information, housing equity history, and details on how the report was produced, including community engagement efforts, this summary does not focus on the individual circumstances of each jurisdiction. Rather, it collates these jurisdictions' most significant barriers to affirmatively furthering fair housing, as self-reported, and lists the strategies they have taken to overcome them, in an attempt to draw out common themes at the regional level.

The top themes to emerge at the regional level are:

1. There is a severe lack of affordable housing amidst already-high housing costs regionwide.
2. The lack of affordable housing leads to displacement and gentrification, impacting access to employment, transportation, and education for low-income people.
3. Communities often oppose new housing construction, especially when it is dense, affordable housing. While framed as an issue of "local control," in some circumstances this opposition to housing may be rooted in implicit discrimination based on race and class/income.
4. Jurisdictional zoning and approval policies and practices reflect this community opposition and contribute to the lack of affordable housing supply.
5. Lack of investment in specific neighborhoods is the result of longstanding explicit housing segregation, leading to racially-concentrated areas of poverty that persist today.
6. Outreach, education, and enforcement of fair housing activities are contracted out to nonprofits with insufficient resources.
7. There are significant accessibility barriers to housing for disabled, non-English-speaking, formerly incarcerated, formerly homeless, and other specific populations.
8. Discrimination in the private housing market is prevalent, both in the rental market and in lending policies and practices that impede home ownership.
9. There is much room for improvement in coordination and cooperation regionwide, both between jurisdictions and among different housing advocacy groups.

Below are more details on these highly interrelated obstacles to fair housing in the Bay Area, as well as actions and strategies that may offer solutions. Nearly all of the reports considered each of the following nine impediments, but they were inconsistent in clarifying whether the strategies noted have actually been implemented or are simply being considered. This high-level summary includes all strategies that local fair housing reports listed as potential solutions to these nine impediments. However, ABAG staff could not determine from these reports how many jurisdictions had implemented each strategy versus how many were considering the strategy but had not yet adopted it. The following list orders both the impediments and the strategies by approximate frequency and importance to the collective

jurisdictions (i.e., the most frequently reported, most important ideas across reports are listed first), as interpreted by ABAG staff who compiled the summary after reviewing the reports.

IMPEDIMENT 1: Lack of Affordable Housing

A lack of affordable housing means a lack of racially and ethnically integrated and balanced communities. Every Bay Area jurisdiction examined in this summary reports a shortage of affordable housing for those who need it, in both rental and ownership markets. The inadequate supply of affordable housing creates a severe housing shortage for communities of color, which are disproportionately economically disadvantaged.[9]

Strategies and Actions for Overcoming this Impediment

1. Seek funding for new affordable housing construction

- Pursue dedicated sources of funding for affordable housing (citywide, countywide, or regionwide), including:
  - o Affordable housing bonds
  - o Local sales tax, transit occupancy tax, or vacant home tax
  - o Housing trust funds for affordable housing development
- Explore state and national funding, such as CA Senate Bill 2
- Increase in-lieu fees[10] to reflect actual cost of affordable housing development
- Pool in-lieu fees among cities
- Adopt inclusionary housing policies to bolster funds to support affordable housing

2. Identify new sites for affordable housing

- Prepare and publicize available and easily obtainable maps of all incorporated and unincorporated vacant and underutilized parcels
- Create a public database of potential sites that can be updated regularly

3. Incentivize developers to build new affordable units

- Prioritize the production of affordable housing units in sizes appropriate for the population and based on family size
- Reduce developer fees for affordable housing
- Encourage market rate housing to include affordable units, such as by promoting use of density bonuses
- Identify underutilized parcels to acquire, convert and develop into affordable housing
- Award higher points in housing developer applications to projects that offer units of 3+ bedrooms
- Support Project-Based Voucher (PBV) developments[11]

14 *For more information on economic disparities across racial/ethnic groups in the Bay Area, see An Equity Profile of the Nine-County San Francisco Bay Area Region, by PolicyLink and PERE, the Program for Environmental and Regional Equity at the University of Southern California. Read at: https://nationalequityatlas.org/sites/default/files/Final_9_County_BayAreaProfile.pdf.*

15 *In-lieu fees are fees paid by developers of market rate housing to satisfy affordable housing requirements in jurisdictions with inclusionary housing ordinances. The fee is paid in-lieu of providing on-site affordable housing, and jurisdictions typically use the fee to finance affordable housing development at a different site.*

16 *Under the Project-Based Voucher program, a Public Housing Agency enters into anassistance contract with a development owner. This assistance subsidizes the rents for up to 25% of the units in the development for a specified term. Households living in units subsidized by PBVs pay 30% of their income toward rent, and the Public Housing Agency pays the development owner the difference between the rent the household pays and the gross rent for the unit. PBVs can enable an affordable housing development to charge more deeply affordable rents and better serve extremely low-income households.*

- Promote objective development and design standards for housing development projects that qualify for streamlined permit review
- Provide assistance to developers to secure entitlements and county funding for extremely low-income/special needs units
- Coordinate use of housing subsidies to build affordable housing in high-opportunity areas in order to increase low-income households' access to designated opportunity areas with low poverty rates, healthy neighborhoods, and high-performing schools
- Explore the production of units that are affordable by design, such as Accessory Dwelling Units (ADUs) and micro-units

4. Consider existing units: Protect currently affordable housing from becoming market-rate, and/or convert currently market-rate housing to affordable housing

- Provide technical assistance and funding application assistance to retain affordable units at risk of converting to market rate
- Develop and implement a small site acquisition and rehabilitation program that effectively channels fees paid to the city, leveraged with other public and private resources, to the preservation of small buildings serving low-income tenants
- Leverage financial resources from state and federal programs to rehabilitate existing affordable housing projects nearing the end of their affordability restrictions and extend their subsidy into the future
- Donate municipally-owned, tax-foreclosed properties to nonprofit community land trusts to be rehabilitated, as needed, and preserved for long-term affordable housing

IMPEDIMENT 2: Displacement and Gentrification

As defined by the Urban Displacement Project at UC Berkeley, gentrification is a process of neighborhood change in a historically disinvested neighborhood that includes both economic and demographic change. These changes occur as a result of both real estate investment and new higher-income residents moving in, which results in corresponding changes in the education level or racial makeup of residents.[12] Gentrification often causes displacement, which prevents long-term residents from benefitting from new investments in their neighborhood. Moreover, when low-income families are displaced from their homes, they typically move to lower-income neighborhoods, which generally lack options for high-quality employment, transportation, and schools.[13]

Strategies and Actions for Overcoming this Impediment

1. Adopt tenant protections

- Adopt tenant protections, such as relocation costs, increased noticing, just cause for eviction, and rent control ordinances
- Promote new fair housing laws, including AB 1482,[14]

17 For more information on gentrification, see https://www.urbandisplacement.org/gentrification-explained.
18 For more information on the impacts of displacement, see https://www.urbandisplacement.org/pushedout.
19 For more information on the statewide rent caps and just cause for eviction protections instituted by AB 1482, see https://sfrb.org/article/summary-ab-1482-california-tenant-protection-act-2019.

including posting information on jurisdiction websites

- Collaborate with regional efforts such as established countywide homeless action plans/goals/programs that may provide one-time rent assistance to low-income people in jeopardy of being evicted due to life emergency or hardship
- Commission market-based rent surveys to seek adjustments to the fair market rents (FMRs) for the federal Housing Choice Voucher program
- Use eminent domain to block home foreclosures
- Fund and support multi-agency collaborative efforts for legal services, including organizations that do not receive Legal Services Corporation funding (federal funds) and are able to represent undocumented residents

2. Prioritize existing and new affordable housing, specifically in gentrifying areas

- Develop displacement mitigation or replacement requirements for any rezoning activities that could displace existing residents
- In tandem with investments in affordable housing development in low-poverty areas, provide funds for the preservation of affordable housing in areas that are undergoing gentrification or are at risk of gentrification, in particular in areas of high environmental health
- Donate municipally-owned, tax-foreclosed properties to nonprofit community land trusts to be rehabilitated, as needed, and preserved for long-term affordable housing
- Explore the development of policy that will allow a set-aside in affordable housing developments that prioritizes residents who are being displaced from low-income neighborhoods undergoing displacement and/or gentrification
- Offer minor home repair grants to help homeowners remain in their homes

IMPEDIMENT 3: Community Opposition to New Housing

Communities often prefer single-family homes in their neighborhoods, which residents typically describe as based on fear of lowered property values, overcrowding, or changes in the character of the neighborhood. When communities resist new housing, it often results in the exclusion of people of color and low-income households.

Strategies and Actions for Overcoming this Impediment

- Develop growth management programs intended to concentrate urban development and preserve agriculture and open space
- Provide ongoing community engagement to educate, include and inform residents about the challenges with housing, and to highlight the jurisdiction's prior achievements in developing affordable housing and addressing racial disparities in housing choice
- Develop strategies and talking points to address topics cited in opposition to housing development, including the impact on schools, water, transportation and traffic
- Include and expand the number of participants who engage in discussions about barriers to fair housing and disparities in access and opportunities, and provide

opportunities to advance recommendations to address housing challenges

IMPEDIMENT 4: Zoning Practices and Building Approvals

Local land use controls, zoning regulations, and impact fees are major impediments to constructing and preserving affordable housing. Unlike many other impediments to fair housing, jurisdictions have the authority to directly address these issues.

Strategies and Actions for Overcoming this Impediment

1. Evaluate and update zoning

- Evaluate and update existing zoning to ensure compliance with state-mandated streamlining requirements
- Rezone and repurpose underdeveloped areas
- Modify current zoning and other local policies regulating housing development that pose a direct or indirect constraint on the production of affordable housing
- Update zoning and programs to incentivize accessory dwelling units (ADUs)
- Explore revisions to building codes or processes to reduce the costs of ADU construction and/or allow a greater number of ADUs
- Encourage mixed-use transit-oriented development for affordable housing sites that are located near transportation facilities and employment centers by appropriately zoning for higher density residential and mixed-use developments, maximizing the linkages between employers and affordable housing
- Consider rezoning sites for affordable housing outside of racially segregated areas that are predominantly residents of color
- Consider reduced development standards, specifically parking requirements, to incentivize the development of specific housing types, including units with affordability covenants, units for special needs individuals, higher density residential development, and developments near public transit

2. Evaluate and update fees, processing times, ordinances

- Review existing inclusionary housing in-lieu fees, housing impact fees, and jobs-housing linkage fee programs to maximize number of units, as consistent with current housing market conditions and applicable law
- Evaluate options for streamlined processing of affordable housing developments
- Discourage or eliminate live/work preferences in inclusionary ordinances

IMPEDIMENT 5: Segregation, Lack of Investment in Specific Areas, Racially/Ethnically Concentrated Areas of Poverty (R/ECAPs)

Public and private disinvestment in certain areas has resulted in racially/ethnically concentrated areas of poverty (R/ECAPs). In these neighborhoods, lack of tax revenue and funds for services has led to deteriorated and abandoned properties and areas where communities of color cannot access amenities needed for a healthy life.

Strategies and Actions for Overcoming this Impediment

1. Target economic investment opportunities in R/ECAPS while protecting against displacement

- Fund home-based childcare projects and microenterprise projects with Community Development Block Grant (CDBG) funds
- Provide Family Self-Sufficiency program participants with job training referrals and career networking[15]
- Explore financially supporting economic development activities and initiatives in and around R/ECAPs
- Prioritize economic development expenditures in and around R/ECAPs
- Prioritize funding for job training programs in and around R/ECAPs, including industrial jobs
- Prioritize infrastructure and streetscaping improvements in R/ECAPs in order to facilitate local retail development
- Engage with small business incubators to expand to R/ECAPs or to provide technical assistance to start-up incubators
- Explore methods for providing low-interest loans and below-market leases for tax-foreclosed commercial properties to low-income residents seeking to start businesses within R/ECAPs

2. Improve access to home renting and buying for residents in R/ECAPS

- Work with communities to develop a community land trust for low-income residents that creates opportunities for affordable housing and home ownership, with specific inclusion for residents of color with historic connections to the area
- Build affordable housing projects in middle- and upper-income neighborhoods to the maximum degree possible
- Create more standardized screening policies and procedures for city-sponsored affordable housing
- First-time homebuyer down payment assistance programs

IMPEDIMENT 6: Outreach, Education, Enforcement

Nearly all jurisdictions report contracting with nonprofit organizations (partly funded by city and county grants) to provide local fair housing services and education, including counseling, language services, and handling of fair housing complaints. Despite these efforts, the region lacks sufficient housing search assistance, voucher payment standards, landlord outreach, mobility counseling, and education about

20 Family Self-Sufficiency is a program that enables HUD-assisted families to increase their earned income and reduce their need for welfare assistance and rental subsidies.

fair housing rights. Inadequate funding and organizational capacity of the nonprofits providing services plays a role.

Strategies and Actions for Overcoming this Impediment

1. Better fund all fair housing services

- Allocate more federal, state, and local funding for nonprofit organizations providing fair housing services
- Fund and support multi-agency collaborative efforts for legal services, including organizations that do not receive Legal Services Corporation funding (federal funds) and are able to represent undocumented residents

2. Promote better fair housing outreach and education services

- Continue to contract with fair housing service providers to educate home seekers, landlords, property managers, real estate agents, and lenders regarding fair housing law and recommended practices, including the importance of reasonable accommodation under the Americans with Disabilities Act; to mediate conflicts between home seekers, landlords, property managers, real estate agents, and lenders; and to continue fair housing testing and audits
- Implement annual training programs for property managers and residents
- Seek ways to increase resident access to fair housing services, such as improved marketing of services, improved landlord education, and improved tenant screening services to avoid owner bias
- Educate tenants and landlords on new fair housing laws
- Provide financial literacy and homebuyer education classes
- Continue to fund housing placement services for people with disabilities to assist them in finding accessible housing
- Develop and distribute informational brochure on inclusionary leasing practices, including with licenses where applicable
- Continue and increase outreach and education activities for all protected classes
- Include education on new requirements of Assembly Bill 2413 (Chiu), the Right to a Safe Home Act, in outreach activities to both landlords and the public[19]
- Explore alternative formats for fair housing education workshops such as pre-taped videos and/or recordings, which could serve persons with more than one job, families with young children and others who find it difficult to attend meetings in person

3. Better advertise affordable housing opportunities

- Create a database of all restricted housing units citywide/countywide/regionwide that could be posted online to provide user-friendly information about the location and application process for each development
- Advertise the availability of subsidized rental units via the jurisdictions' websites and or apps, the 2-1-1 information and referral phone service, and other media outlets

IMPEDIMENT 7: Accessibility for Specific Populations

Many jurisdictions report a lack of accessible housing for persons with disabilities, non-English-speaking people, formerly incarcerated people, formerly homeless people, seniors, and other specific populations—all direct fair housing issues.

Strategies and Actions for Overcoming this Impediment

- Fund housing placement services for people with disabilities to assist them in finding accessible housing
- Offer landlord incentives, such as leasing bonuses, for specific populations
- Conduct a research effort in collaboration with an academic institution to better understand the landlord population and create more evidence-based policy initiatives
- Increase marketing efforts of affordable housing units to people that typically face barriers and discrimination in fair housing choice, such as persons with disabilities, people of color, low-income families, seniors, new immigrants, and people experiencing homelessness
- To the extent practicable, use affordable housing funds for the construction of permanent supportive housing in developments in which 10-25% of units are set aside for persons with disabilities. Affirmatively market units to individuals with intellectual and developmental disabilities, their families, and service providers
- Explore methods for nonprofit partners to assist in purchasing or master leasing affordable units within inclusionary market-rate developments, and set a portion of those units aside for persons with disabilities
- Develop and disseminate a best practices guide to credit screening in the rental housing context in order to discourage the use of strict credit score cut-offs and overreliance on eviction records
- For publicly-supported housing, develop protocols to ensure responsiveness to reasonable accommodation requests

IMPEDIMENT 8: Discrimination in Home Ownership and Rental Markets

Over time explicit, legal discrimination has given way to implicit, unwritten biases in mortgage access and lending policies and practices for people of color—specifically in high rates of denial of mortgages for African American and Hispanic households. In the rental housing market, discrimination against low-income people, minorities, immigrants, and LGBTQ people is also prevalent. People using Housing Choice Vouchers also face discrimination for their source of income.

Strategies and Actions for Overcoming this Impediment

- Work with communities to develop a community land trust for low-income residents that creates opportunities for affordable housing and home

ownership, with specific inclusion for residents of color with historic connections to the area

- Explore creating incentives for landlords to rent to Housing Choice Voucher holders, such as a leasing bonus, damage claim reimbursement, security deposit and utility assistance
- Streamline Housing Choice Voucher administration so participation is easy for landlords
- Increase outreach to LGBTQ and immigrant stakeholder groups to provide "know your rights" materials regarding housing discrimination
- Emphasize bilingual fair housing services and activities to ensure all members know their housing rights and the benefits
- Proactively enforce source of income discrimination laws[16]
- Contract with local service providers to conduct fair housing testing in local apartment complexes
- Modify and standardize screening criteria to ensure access to housing for otherwise qualified applicants with credit challenges or criminal histories
- Educate landlords on criminal background screening in rental housing (using HUD fair housing guidance) and explore the feasibility of adopting ordinances

IMPEDIMENT 9: Coordination and Cooperation

There is fragmentation among jurisdictions and among fair housing advocacy groups. More regional cooperation is needed to address disproportionate housing needs and the jobs-housing balance across the region.

Strategies and Actions for Overcoming this Impediment

- Expand ongoing interagency connections to support weatherization, energy efficiency, and climate adaptation for low-income residents
- Create a shared list of lenders countywide/regionwide that can help buyers access below-market-rate loans and sponsor down payment and mortgage assistance programs
- Collaborate on cross-jurisdictional informational databases or other resources for all aspects of housing
- Consider a sub-regional approach to share resources and possibly units to increase collaboration and production

21 Senate Bill 329, enacted in 2019, prohibits landlords from disriminating against tenants who use Housing Choice Vouchers or other government assistance to pay their rent.

Images compiled by NPH Northern California

Cover Half Moon Village in Half Moon Bay
Bruce Damonte courtesy MidPen Housing

Page 6 Merritt Crossing Senior Apartments in Oakland
Tim Griffith courtesy SAHA

Page 8 Fell Street Apartments in San Francisco
Clark Mishler courtesy BRIDGE Housing

Page 14 Station Center in Union City
Bruce Damonte courtesy MidPen Housing

Page 19 Richardson Apartments in San Francisco
Bruce Damonte courtesy CHP

Page 21 Armstrong Place Senior Housing in San Francisco
Julio Cesar courtesy BRIDGE Housing

Page 40 The Savoy in Oakland
courtesy SAHA

Page 43 Richardson Apartments in San Francisco
Bruce Damonte courtesy CHP

© Karl Nielsen. All Rights Reserved.

© Karl Nielsen. All Rights Reserved.

BAY AREA METRO CENTER
375 Beale Street, Suite 700
San Francisco, CA 94105

415.820.7900 PHONE
RHNA@bayareametro.gov E-MAIL
www.abag.ca.gov WEB

From:	Lyle, Amy
To:	Montoya, Michelle
Cc:	Hartman, Clare; Nicholson, Amy
Subject:	FW: [EXTERNAL] Fwd: comment on Housing Element draft -- mobile homes
Date:	Monday, June 6, 2022 10:41:06 PM

Hi Michelle, can you include this in the late correspondence with the County's RHNA comment letters please?

Thanks,
Amy

Amy Lyle (she,her)| Supervising Planner- Advance Planning
Planning & Economic Development|100 Santa Rosa Avenue, Room 3 | Santa Rosa, CA 95404
Cell (707) 791-5533 | Office (707) 543-3410 | Alyle@srcity.org

From: Warren Wiscombe <warren.j.wiscombe@gmail.com>
Sent: Sunday, June 5, 2022 1:06 PM
To: Lyle, Amy <ALyle@srcity.org>
Subject: [EXTERNAL] Fwd: comment on Housing Element draft -- mobile homes

---------- Forwarded message ---------
From: **Warren Wiscombe** <warren.j.wiscombe@gmail.com>
Date: Sun, Jun 5, 2022 at 1:03 PM
Subject: comment on Housing Element draft -- mobile homes
To: <srforward@srcity.org>

Hi,

I searched the draft for instances of "trailer" (1) and "mobile" (many) to see if any new or creative policies were being proposed, and I didn't find any. It is of course nice to follow the law and not break up existing mobile home parks, but I had expected more focus on this housing type since it offers a very useful option for working our way out of the growing housing crisis.

I have watched as a variety of mobile housing types have been used to try to address the homeless crisis, and even the tents out at Los Guilicos, and it all seems like a kind of patchwork quilt with no guiding philosophy or plan, just a sort of knee-jerk reaction to the crisis of the moment. I would have expected a more long term view in The Draft, and I don't see one.

Right now, mobile home parks are scattered almost randomly around Santa Rosa. There doesn't seem to be any plan. The Draft should offer such a plan, not just say

"we are going to continue doing what we are doing". If ever Santa Rosa is to work its way out of the housing crisis, an organized plan for mobile homes, widely construed, has to be an integral part.

Note that the cost argument is central here. Mobile homes can be purchased for $50K or so, some more, some less, while the median price for a single-family house has soared to more than ten times that figure. Single-family houses are now beyond the reach of most middle-class people, and apartments are quickly following. Without a big plan to expand mobile homes -- beyond "just keep doing the same thing" -- we are dead on housing costs and unwittingly committing to an increasing traffic problem as people are forced to live out in the boonies, in more fire-prone areas, to escape skyrocketing SR housing costs.

I will close by noting that when I asked our old real estate agent about mobile homes, she said that hers and other realty companies don't even consider them houses, and don't include them in the multiple listings or in the assessments of median house prices. They are just hidden from view (until they burn) and they are largely condemned to remain so in your current Draft.

Warren Wiscombe
1850 Velvetleaf Ln
Santa Rosa 95404