

Appendix 5: Final Subregional Shares

State Housing Element Law allows two or more neighboring jurisdictions to form a “subregion” to conduct a parallel RHNA process to allocate the subregion’s housing need among its members.¹ 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.

For the 2023–31 RHNA, subregions were formed in:

1. **Napa County:** includes City of American Canyon, City of Napa, Town of Yountville, and the County of Napa (*does not include City of Calistoga or City of St. Helena*)
2. **Solano County:** 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 Regional Housing Need Determination (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.

On May 21, 2020, the ABAG Executive Board adopted the methodology for assigning a subregion its share of the RHND. The adopted methodology stipulates that the share of the RHND for each subregion will be based on the sum of the default allocations, by income category, from the ABAG RHNA methodology for each jurisdiction in the subregion. Using ABAG’s RHNA methodology as the input into the subregion shares ensures every jurisdiction that is a member of a subregion receives the same allocation it would have received if it were not part of a subregion. This approach ensures that formation of a subregion does not confer any harm or benefit to member jurisdictions or to other jurisdictions in the region.

On October 15, 2020, the ABAG Executive Board approved release of the Draft Subregional Shares.² The Draft Subregional Shares were based on the Proposed RHNA Methodology, which reflected baseline data on 2050 households from the Plan Bay Area 2050 Draft Blueprint. Applying the subregional share methodology to the Bay Area’s RHND of 441,176, the Draft Subregional Share for the Napa County subregion was 0.78 percent of the region’s housing needs and the Draft Subregional Share for the Solano County subregion was 2.7 percent of the region’s housing needs. **Table 1** shows each subregion’s draft share by income category.

¹ [Government Code Section 65584.03.](#)

² For more information, see <https://mtc.legistar.com/LegislationDetail.aspx?ID=4665721&GUID=6B565EC3-A706-4695-8A87-277F6791A1DB&Options=&Search=>

Table 1: Draft Subregional Shares, Total Units by Income Category

Subregion	Very Low	Low	Moderate	Above Moderate	TOTAL
Napa County	912	527	557	1,440	3,436
Solano County	3,082	1,772	1,966	5,086	11,906

Housing Element Law requires ABAG to hold a public comment period and conduct at least one public hearing to receive comments on the Draft Subregional Shares³ prior to adoption of the Final Subregional Shares. The written public comment period began on October 25 and ended on November 27 per the Notice of Public Hearing published in newspapers and an ABAG press release. Additionally, ABAG held a public hearing at the November 12 meeting of the Regional Planning Committee. ABAG received no comments on the Draft Subregional Shares.

The Final Subregional Shares are based on the Draft RHNA Methodology, which incorporates updates made throughout fall 2020 to reflect the revised Strategies and Growth Geographies approved by the ABAG Executive Board and Commission in September 2020 for the Final Blueprint. Integrating the updated data about future year 2050 households from the Final Blueprint into the Draft RHNA Methodology results in changes to the allocations to local jurisdictions, and thus the subregional shares. Per the recommendation made by the ABAG Regional Planning Committee at its January 14 meeting, the Draft RHNA Methodology incorporates the “equity adjustment,” which also affects the subregional shares.

In December 2020, the jurisdictions who were members of the Napa Subregion decided to dissolve their subregion. As a result, these jurisdictions will participate in the RHNA process ABAG is conducting and will receive allocations based on the RHNA methodology adopted by ABAG. Accordingly, ABAG-MTC staff has only identified a Final Subregional Share for the Solano County subregion. Applying the subregional share methodology to the Bay Area’s RHND of 441,176, the Final Subregional Share for the Solano County subregion is 2.49 percent of the region’s housing needs. **Table 2** shows the subregion’s final share by income category.

Table 2: 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

³ [California Government Code 65584.03 \(c\)](#)