

Association of Bay Area Governments

Executive Board

December 17, 2020

Agenda Item 9.a.

Regional Housing Needs Allocation (RHNA) Update

Subject: Presentation highlighting comments received during the public comment period about the Proposed RHNA Methodology and Draft Subregional Shares in October and November, as well as preliminary staff responses.

Background: The Regional Housing Needs Allocation (RHNA) is the state-mandated¹ process for allocating a share of the Regional Housing Need Determination (RHND) the Bay Area received from the California Department of Housing and Community Development (HCD)² to every local government in the Bay Area. The RHNA methodology is a formula that quantifies the number of housing units, separated into four income categories, that will be assigned to each city, town, and county in the region. The allocation must meet the statutory objectives identified in Housing Element Law³ and be consistent with the forecasted development pattern from Plan Bay Area 2050.⁴ Each local government must then update the Housing Element of its General Plan and its zoning to show how it can accommodate its RHNA allocation.

ABAG convened an ad hoc [Housing Methodology Committee](#) (HMC) from October 2019 to September 2020 to advise staff on the methodology for allocating a share of the region's total housing need to every local government in the Bay Area. The HMC included local elected officials and staff as well as regional stakeholders to facilitate sharing of diverse viewpoints across multiple sectors.⁵ At its final meeting on September 18, the HMC voted to recommend **Option 8A: High Opportunity Areas Emphasis & Job Proximity** with the 2050 Households baseline allocation as the Proposed RHNA Methodology. On October 1, the ABAG Regional Planning Committee (RPC) voted to recommend this methodology for approval by the Executive Board, and the Board approved its release as the Proposed RHNA Methodology for public comment on October 15, 2020. Materials related to the Proposed RHNA Methodology have been posted on ABAG's website since October 24 (<https://abag.ca.gov/our-work/housing/rhna-regional-housing-needs-allocation>).

¹ See California [Government Code Section 65584](#).

² In a [letter dated June 9, 2020](#), HCD provided ABAG with a total RHND of 441,176 units for the 2023-2031 RHNA.

³ See [California Government Code Section 65584\(d\)](#).

⁴ See [Government Code Section 65584.04\(m\)\(1\)](#).

⁵ The HMC roster is available at https://abag.ca.gov/sites/default/files/hmc_roster_06_16_2020_0.pdf.

Association of Bay Area Governments

Executive Board

December 17, 2020

Agenda Item 9.a.

Regional Housing Needs Allocation (RHNA) Update

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.⁶ 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.

Issues:

Public Comment Period for the Proposed RHNA Methodology and Draft Subregional Shares

[California Government Code 65584.04 \(d\)](#) requires ABAG to hold a public comment period and conduct at least one public hearing to receive oral and written comments on the Proposed RHNA Methodology prior to adoption of the Draft RHNA Methodology. [California Government Code 65584.03 \(c\)](#) requires ABAG to hold a public comment period and conduct at least one public hearing to receive oral and written comments on the Draft Subregional Shares prior to adoption of the Final Subregional Shares.

The written public comment period for both 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 RPC meeting, where 29 local government representatives, advocacy organizations, and members of the public provided oral comments on the Proposed RHNA Methodology. There were no comments made about the Draft Subregional Shares at the public hearing.

As of the close of the public comment period on November 27, ABAG has received 106 written comments on the proposed methodology from local government staff and elected officials, advocacy organizations, and members of the public. There were no comments received about the draft subregional shares.

Attachment A summarizes the major themes of the comments received. **Attachment B** is the public hearing transcript. **Attachment C and D** are compilations of written comments.

Next Steps:

Staff will consider comments and will recommend any necessary adjustments for integration into the Draft RHNA Methodology, which is scheduled for release in the next week. The ABAG Regional Planning Committee will weigh in on the Draft Methodology and Final Subregional Shares at its meeting on

⁶ [Government Code Section 65584.03.](#)

Association of Bay Area Governments

Executive Board

December 17, 2020

Agenda Item 9.a.

Regional Housing Needs Allocation (RHNA) Update

January 14, 2021 and the ABAG Executive Board is slated to take action on the Draft RHNA Methodology and Final Subregional Shares at the January 21, 2021 meeting.

Recommended Action: Information

Attachments:

- A. Memo – Summary of Comments Received
- B. Public Hearing Transcript
- C. Compilation of Public Comments Received: Local Jurisdictions
- D. Compilation of Public Comments Received: Individuals and Stakeholders
- E. Presentation

Reviewed:



Therese W. McMillan