



Bay Area Metro Center
375 Beale Street
Suite 700
San Francisco, California

Meeting Agenda - Final

ABAG Housing Methodology Committee

Chair, Jesse Arreguin, Mayor, City of Berkeley

Thursday, August 13, 2020

10:00 AM

Remote

Association of Bay Area Governments Housing Methodology Committee

The ABAG Housing Methodology Committee will be meeting on August 13, 2020, 10:00 a.m., in the Bay Area Metro Center (Remotely). In light of Governor Newsom's State of Emergency declaration regarding the COVID-19 outbreak and in accordance with Executive Order N-29-20 issued by Governor Newsom on March 17, 2020 and the Guidance for Gatherings issued by the California Department of Public Health, the meeting will be conducted via webcast, teleconference, and Zoom for committee, commission, or board members who will participate in the meeting from individual remote locations.

A Zoom panelist link for meeting participants will be sent separately to committee, commission, or board members.

The meeting webcast will be available at: <https://abag.ca.gov/meetings-events/live-webcasts>

Members of the public are encouraged to participate remotely via Zoom at the following link or phone number.

Attendee Link: <https://bayareametro.zoom.us/j/97706177662>
Join by Telephone: 888 788 0099 (Toll Free) or 877 853 5247 (Toll Free)
Webinar ID: 977 0617 7662

Detailed instructions on participating via Zoom are available at:
<https://abag.ca.gov/zoom-information>

Committee members and members of the public participating by Zoom wishing to speak should use the "raise hand" feature or dial "*9".

In order to get the full Zoom experience, please make sure your application is up to date.

Members of the public may participate by phone or Zoom or may submit comments by email at info@bayareametro.gov by 5:00 p.m. the day before the scheduled meeting date. Please include the committee or board meeting name in the subject line. Due to the current circumstances there may be limited opportunity to address comments during the meeting. All comments received will be submitted into the record.

The ABAG Housing Methodology Committee may act on any item on the agenda.

The meeting is scheduled to begin at 10:00 a.m.

Agenda and roster available at <https://abag.ca.gov>

For information, contact Clerk of the Board at (415) 820-7913.

Roster

Josh Abrams, Susan Adams, Anita Addison, Jesse Arreguin, Rupinder Bolaria, Rick Bonilla, Michael Brilliot, Monica Brown, Amanda Brown-Stevens, Paul Campos, Ellen Clark, Diane Dillon, Forrest Ebbs, Pat Eklund, Jonathan Fearn, Victoria Fierce, Neysa Fligor, Mindy Gentry, Russell Hancock, Welton Jordan, Brandon Kline, Jeffrey Levin, Scott Littlehale, Tawny Macedo, Fernando Marti, Rodney Nickens, Jr., James Pappas, Julie Pierce, Bob Planthold, Darin Ranelletti, Matt Regan, Jane Riley, Carlos Romero, Elise Semonian, Aarti Shrivastava, Vin Smith, Matt Walsh

1. Call to Order / Roll Call / Confirm Quorum**2. Public Comment**

Information

- 2.a. [20-1250](#) ABAG Housing Methodology Committee Public Comment for August 13, 2020

Action: Information

Attachments: [Item 2a Public Comment Sykes Letter RHNA.pdf](#)

3. Chair's Report

- 3.a. [20-1144](#) ABAG Housing Methodology Committee Chair's Report of August 13, 2020

Action: Information

Presenter: Jesse Arreguin

Attachments: [Item 3a 1 HMC Meeting #8 Notes.pdf](#)
[Item 3a 2 Correspondence from HMC Members.pdf](#)
[Item 3a 3 Presentation.pdf](#)
[Item 3a 4 1 Housing Bill Update.pdf](#)
[Item 3a 4 2 Attachment A - Housing Bills.pdf](#)

4. Consent Calendar

- 4.a. [20-1146](#) Approval of ABAG Housing Methodology Committee Minutes of July 9, 2020

Action: Approval

Presenter: Clerk of the Board

Attachments: [Item 4a Minutes 20200709 Draft.pdf](#)

5. RHNA Methodology Concepts

5.a. [20-1147](#) Refining RHNA Methodology Concepts

Presentation of analysis to answer the HMC's questions about the RHNA methodology's potential baseline allocation, income allocation approach, and factors/weights. The HMC will discuss their preferences and possible recommendations for methodology components.

Action: Information

Presenter: Gillian Adams

Attachments: [Item 5a 1 Summary Sheet Methodology_Concepts.pdf](#)
[Item 5a 2 Attachment A - RHNA Methodology Concepts.pdf](#)
[Item 5a 2 Appendix 1 - Baseline Share Maps.pdf](#)
[Item 5a 2 Appendix 2 - Total Allocations.pdf](#)
[Item 5a 2 Appendix 3 - Maps Methodology_Concepts.pdf](#)
[Item 5a 2 Appendix 4 - Income Allocations.pdf](#)
[Item 5a 2 Appendix 5 - Allocation Results Table.pdf](#)
[Item 5a 2 Appendix 6 - Performance Evaluation.pdf](#)
[Item 5a Public Comment Combined.pdf](#)

6. Adjournment / Next Meeting

The next special meeting of the ABAG Housing Methodology Committee is on August 28, 2020.

Public Comment: The public is encouraged to comment on agenda items at Committee meetings by completing a request-to-speak card (available from staff) and passing it to the Committee secretary. Public comment may be limited by any of the procedures set forth in Section 3.09 of MTC's Procedures Manual (Resolution No. 1058, Revised) if, in the chair's judgment, it is necessary to maintain the orderly flow of business.

Meeting Conduct: If this meeting is willfully interrupted or disrupted by one or more persons rendering orderly conduct of the meeting unfeasible, the Chair may order the removal of individuals who are willfully disrupting the meeting. Such individuals may be arrested. If order cannot be restored by such removal, the members of the Committee may direct that the meeting room be cleared (except for representatives of the press or other news media not participating in the disturbance), and the session may continue.

Record of Meeting: Committee meetings are recorded. Copies of recordings are available at a nominal charge, or recordings may be listened to at MTC offices by appointment. Audiocasts are maintained on MTC's Web site (mtc.ca.gov) for public review for at least one year.

Accessibility and Title VI: MTC provides services/accommodations upon request to persons with disabilities and individuals who are limited-English proficient who wish to address Commission matters. For accommodations or translations assistance, please call 415.778.6757 or 415.778.6769 for TDD/TTY. We require three working days' notice to accommodate your request.

可及性和法令第六章: MTC 根據要求向希望來委員會討論有關事宜的殘疾人士及英語有限者提供服務/方便。需要便利設施或翻譯協助者，請致電 415.778.6757 或 415.778.6769 TDD / TTY。我們要求您在三個工作日前告知，以滿足您的要求。

Acceso y el Titulo VI: La MTC puede proveer asistencia/facilitar la comunicación a las personas discapacitadas y los individuos con conocimiento limitado del inglés quienes quieran dirigirse a la Comisión. Para solicitar asistencia, por favor llame al número 415.778.6757 o al 415.778.6769 para TDD/TTY. Requerimos que solicite asistencia con tres días hábiles de anticipación para poderle proveer asistencia.

Attachments are sent to Committee members, key staff and others as appropriate. Copies will be available at the meeting.

All items on the agenda are subject to action and/or change by the Committee. Actions recommended by staff are subject to change by the Committee.



ABAG

Metropolitan Transportation Commission

375 Beale Street, Suite 800
San Francisco, CA 94105

Legislation Details (With Text)

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On agenda: 8/13/2020 **Final action:**

Title: ABAG Housing Methodology Committee Public Comment for August 13, 2020

Sponsors:

Indexes:

Code sections:

Attachments: [Item 2a Public Comment Sykes Letter RHNA.pdf](#)

Date	Ver.	Action By	Action	Result
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ABAG Housing Methodology Committee Public Comment for August 13, 2020

Information

August 6, 2020

Dear ABAG Housing Methodology Committee,

We thank the members of the ABAG Housing Methodology Committee for undertaking the challenging work to develop a fair methodology for the Regional Housing Needs Allocation for the Bay Area region.

In this statewide housing crisis where many residents are spending 30% or more of their income on housing, are spending long hours commuting from more affordable outlying areas, or uprooting to other states, your methodology can be foundational to both increasing the Bay Area's housing supply and providing our residents with improved quality of life in a more balanced, equitable manner.

We request that the Committee strongly factor the significant imbalance among cities throughout our region as it refines the RHNA methodology. Many of our neighboring cities have 2.5 or 3.0 jobs per employed residents. As long as other Bay Area cities undersupply housing relative to their job base, our region will continue to struggle with traffic congestion and the accompanying air quality and quality of life issues. Now more than ever, a collective vision for our region should be one where more workers have the opportunity to live and prosper within the community in which they work.

The City of San José has and continues to proactively plan for the housing needs of the existing and future residents of our community. The Envision San Jose 2040 General Plan provides a policy framework to accommodate growth by adding 120,000 new residences by 2040. These residences are planned in densified mixed-use, walkable urban villages, located on transit lines, close to and often integrated with jobs-based development and the services and amenities that residents need. This approach not only reduces vehicle miles traveled and greenhouse gas emissions but supports an improved quality of life and placemaking.

For the nearer term, the San José City Council approved a Housing Crisis Workplan to support a goal of 25,000 new homes, with at least 10,000 of those affordable, to be constructed or entitled by 2022. A multi-department Housing Catalyst Team has been established to craft needed policy and ordinance changes that will drive this housing development.

While San José is being proactive to plan and build new housing for all income levels, we are also planning for significant job growth to become a more balanced city. Unlike the other cities in Silicon Valley, San José has significantly fewer jobs than employed residents. With only 0.82 jobs per employed resident, San José is in fact the largest "bedroom community" in the United States. Of the nation's 20 largest cities, San José is the only one with a larger nighttime population of residents than daytime population of employees.

Letter to ABAG Housing Methodology Committee
August 6, 2020
Page 2 of 2

This imbalance has resulted in significant negative impacts to the region's environment, residents' quality of life, and San Jose's fiscal stability. Rather than improving, San José's imbalance relative to other South Bay cities grew more extreme during the economic expansion of the last ten years, as the other cities became even more jobs-rich and housing-poor.

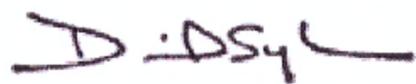
While the environmental and quality of life issues are easily apparent to anyone traveling within Silicon Valley, the less visible fiscal impacts are equally as serious and have resulted in the City facing consistent budgetary challenges even during economic expansions. To illustrate the imbalance, Attachment A displays sales tax per capita during 2018-2019 for San José, neighboring cities, and the State of California. Having a disproportionate share of the housing in the South Bay – at the expense of net positive industrial/commercial land uses – has left San Jose with significantly less revenue per capita to address the very real needs of our diverse community. Even during the height of the recent economic expansion, San Jose struggled to add back services and resources cut during the last recession. As an example, the 2019-2020 budget included 6,647 full-time equivalent (FTE) positions, 11% below the peak of 7,481 FTE in 2001-2002 when San José's population was 12% lower than it is now.

The Bay Area and South Bay need to address the housing crisis but should not do so in a way that further impacts the ability of cities like San Jose to fund critical city services for its residents. We want more of our residents to be able to work in San José – a goal that all cities should embrace in order to reduce commutes, traffic congestion, greenhouse gas emissions, poor air quality, and poor well-being.

We oppose the use of the Plan Bay Area 2050 Blueprint as either a factor or the baseline allocation for RHNA. Despite the Blueprint's effectiveness at promoting equity and improving the jobs-housing balance across the region, it does neither in the context of RHNA. By focusing on South Bay job centers, it allocates more housing to San Jose and ignores cities elsewhere in the region that have undersupplied housing relative to their current job base. This imbalance in the location of housing has contributed to the Bay Area's housing crisis and reinforcing this disparity will not move us toward a more equitable and sustainable future.

Thank you for consideration of our perspective as you move forward with your important work.

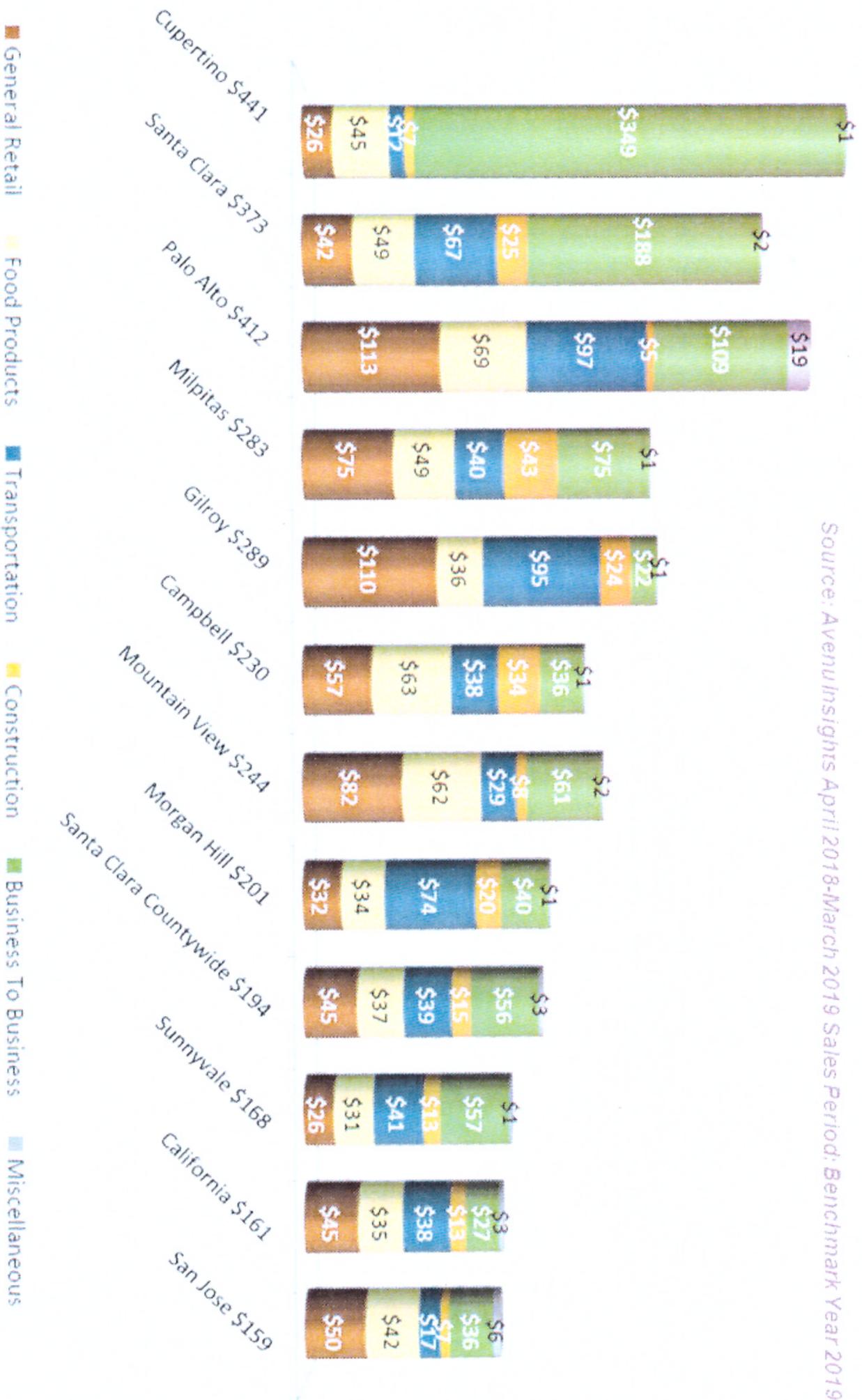
Sincerely,



David Sykes
City Manager

Sales Tax Per Capita

Source: Avenu Insights April 2018-March 2019 Sales Period: Benchmark Year 2019 Q1





ABAG

Metropolitan Transportation Commission

375 Beale Street, Suite 800
San Francisco, CA 94105

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Attachments: [Item 3a 1 HMC Meeting #8 Notes.pdf](#)
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Date	Ver.	Action By	Action	Result
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ABAG Housing Methodology Committee Chair’s Report of August 13, 2020

Jesse Arreguin

Information



MEMO

To: RHNA HMC Team
From: Civic Edge Consulting
Date: July 17, 2020
RE: July 9, 2020 HMC Meeting #8 Notes



Meeting Info

Housing Methodology Committee (HMC) Meeting 8
Thursday, July 9, 2020
Zoom Conference Webinar
[Recording Available Here](#)

Meeting Notes by Agenda Item

1. Call to Order / Roll Call / Confirm Quorum – Jesse Arreguín, Fred Castro

2. Public Comment (Informational)

- This item was moved to the end of the meeting by the Chair

3. Chair's Report – Jesse Arreguín

- Expressed appreciation on behalf of the ABAG Board for the participants in this complex process.
- Clarified that we are limited by use of technology for participation and Q&A and that there will not be a formal break during the meeting.
- Written comments received will be on the record but will not be read aloud. Members of the public can speak during that portion on the agenda. Noted that the meeting will be webcast. Explained rules about how to digitally raise one's hand to speak.
- Stressed that due to the limited time today and the large number of commenters on non-agenda items, that portion of the agenda will be moved to the end of the meeting.
- Explained the updated consensus voting process so it is more visible to the audience.
- Victoria Fierce had requested a legislation update, which may be provided to HMC members at a future meeting.

4. Consent Calendar

- Minutes from last meeting approved from June 19, 2020.
- No verbal or written comments were received.

5. Plan Bay Area (PBA) 2050 Draft Blueprint: Key Findings – *Dave Vautin (Information Item)*

HMC Members – Clarifying Questions

- **Bob Planthold:** Noted that the term “deed restriction” has other connotations. Asked what it refers to now in the context of PBA 2050.
 - **Dave Vautin:** Clarified that “deed restriction” applies to housing for folks at a specific income area, specifically lower income folks.
 - **Planthold:** Suggested using a different term, like “income restricted” for clarity.
- **James Pappas:** Noted that the projected growth for the South Bay is striking. Acknowledged that relaxing zoning controls could lead to a lot of growth in the South Bay in the model, but also felt this large projected growth has regional implications. Requested further explanation and a separation of housing and jobs.
 - **Vautin:** Noted that there is a lot more housing in PBA 2050 than in previous iterations, which was one of the reasons for improvements on our affordability trends. Similarly, most counties have more units than in previous iterations, but their share of overall growth might be smaller than previous iterations. Santa Clara County has a higher share and a higher total number of units. This growth in the South Bay is a result of applying different strategies, including adjusting zoning in specific priority areas to enable more development and re-development, streamlining growth in certain parcels, and re-developing aging malls and office parks, of which Santa Clara County has many.

Furthermore, in Santa Clara we see a lot of large parcels close to jobs, which makes the land incredibly desirable and valuable. The affordable housing being built is especially attractive for low-wage workers down in the South Bay. The growth pattern produced by our model stems from this desirability. Greater flexibility and development capacity would enable more growth since it is the largest cluster of jobs in the Bay Area.

Jobs are difficult to move due to the agglomeration effect, where jobs like to be near other jobs. We know there is a desire for telecommuting, and there may be more folks who don’t report to their worksite. However, there is a continued desirability to be close to other job sites. A lot of high-wage employers want to continue developing in the South Bay so the workforces can interact more when they do come to work. A strategy in the model was to put fee structures in place to encourage more jobs to move to housing rich areas that would be exempt from such fees, but the effect ultimately proved too small. Employers who wanted to develop in the South Bay simply paid the affordable housing fee and still increased their workforce down there. This narrative explains the robust job growth in South Bay region.
- **Neysa Fligor:** Noted that for job growth in South Bay, 41 percent feels way too high. Anecdotally, there has been job growth along San Mateo County going up to SF and Alameda counties and young tech employees want to live in those cities, which drives where the tech companies locate. Projection seems unrealistic based on what has been happening, and recent COVID factors. Further questioned the 14 percent work-from-



home projection. Concerned about making decisions based on this data that does not correspond with their lived reality. Lastly, RHNA and PBA have components for green space per capita and is curious how growth in South Bay will impact green space for PBA 2050?

- **Vautin:** Silicon Valley points well taken. Thanks for feedback – we need your feedback to modify our strategies across the region. To give a sense of why so much growth is happening in the South Bay rather than in a place like SF, SF growth is largely defined by pipeline projects in the City. Beyond that, there are a lot of small parcels that are unlikely to redevelop. Although there is a significant amount of growth in SF, it is limited. There is so much growth in South Bay because it has more capacity to grow and re-develop.
- **Pappas:** For jobs, or housing or both?
- **Vautin:** For both. There is limited additional up-zoning in SF, but a lot of San Francisco’s re-development is defined by big sites, including Hunters Point and Treasure Island, and specific locations in the Central SoMa Plan. We did not find that upzoning policies tested in the western half of SF did much to increase growth in that part of the city.

Going back to the original question about telecommuting - the state regulates the telecommuting assumption for PBA 2050. We have worked with them closely and, after COVID, we worked to increase it.

Regarding green space, we have a strategy designed to purchase more recreation and park space. There are many opportunities for urban parks as well in the Final Blueprint.

- **Fligor:** The tech sector should be engaged as stakeholders in this project.
- **Aarti Shrivastava:** Many communities in the South Bay will be looking at close to a 50 percent increase in units. A lot of that growth has to do with factors Dave mentioned and the desired results for the region. Suggests that jurisdictions need clarification around how quickly they are expected to grow.
Expressed concern that a lot of the growth in the South Bay will be in areas that are not well served by transit, hence the model’s lower performance for greenhouse gas emissions.
- **Elise Semonian:** Asked about the feasibility of running draft methodology through UrbanSim to evaluate greenhouse gas emissions.
 - **Vautin:** Unfortunately, that is not possible. Since the methodologies are an output element, we don’t have a good way to estimate a specific greenhouse forecast for each of the RHNA methodologies, but we can do so for the Plan Bay Area 2050.
- **Amber Shipley:** Reminded the group that we only have fifteen more minutes on this agenda item, and that it is for clarifying questions only. We will have discussion moving forward.
- **Michael Brilliot:** Can you clarify where in the South Bay the 41 percent job growth will go? San Jose is a bedroom community and has not seen that kind of job growth and our jobs to housing ratio continues degrading. It sounds like you are not projecting



that much growth for jobs in places like Redwood City, San Mateo and up the Peninsula, where job growth has occurred.

- **Vautin:** There is a confluence of economic strategies we applied in the model and, ultimately, our forecast shows high job growth in parts of San Jose, Santa Clara, and Mountain View. Those zones have dense development, many projects in the pipeline, and robust job growth. Referred to the website for the Blueprint materials with a breakdown of job growth in the different parts of Santa Clara County.
- **Jeff Levin:** First, how do the outcomes in the Blueprint compare to actual development in the last 8-10 years? Second, in the Blueprint, what percentage of total housing production is projected to be in the low- and very low-income category? Third, how does the new regional housing entity factor into those strategies?
 - **Vautin:** First, the housing growth pattern has been polarized in the past ten years. Approximately half of the region's growth has been in places like San Francisco and San Jose. The remaining growth has been in periphery region and edge suburbs. Bayside cities have contributed less, compared to their population. In the Draft Blueprint, there is lower growth in the three big cities, and more growth in Bayside suburban communities. The Draft Blueprint calls for about 400,000 new deed restricted units for low- and very low-income demographics – about 30 percent of all units. Third, we do not say who is generating the revenue to help pay for the new deed restricted affordable housing. It could be on the county, housing bonds, city level, regional, or a combination, but bonds will likely be needed to realize this question.
- **Julie Pierce:** What does it take to drive jobs to places where people already are? The inland communities that had the more affordable, naturally occurring housing like the East Bay, Northern Waterfront, and Solano County have wanted this for a while. We keep hearing "it will always be in the same place because jobs like to cluster." The VMT and greenhouse gas numbers are astronomical if we build more housing so far from jobs.
 - **Vautin:** Horizon analysis showed tax incentives were not strong enough to drive jobs to housing-rich places. In February, the Commission and the ABAG Board approved the study a fee structure, designed to charge impact fees for office development in job-rich areas. This has had only minimal impact on jobs moving to Southern and Central Alameda County, but not elsewhere in the region. The most aggressive strategy was to implement specific limitations in high job areas to grow jobs in other areas, which did move jobs to other counties in the model. However, this strategy was not moved forward into the Draft Blueprint by the Commission and ABAG Board.
- **Josh Abrams:** I want to offer feedback on this Blueprint, and you want the HMC to use Plan Bay Area 2050 in our work, but we have no way to discuss it. We can comment, but it feels like you do not value our input if you are not using this forum to get input.
 - **Vautin:** I am sorry that we do not have more time to talk about PBA 2050. We do value your input. I encourage you to participate in one of the many forums coming up for stakeholders and the general public. Reach out to our staff at info@planbayarea.com to learn more.



- **Tawny Macedo:** Is the housing growth model capped based on existing zoning? Cautioned that RHNA methodology may not limit consideration of housing sites based on existing land use restrictions. Also, are the 1.3 million new households in the housing growth pattern what Plan Bay Area sees being completed over the 30-year period? If so, how did that track for the last PBA where .8 million households were projected? Did we meet that housing goal last Plan Bay Area?
 - **Vautin:** First, we start with existing zoning, and then we apply strategies to enable growth in key growth areas, such as near BART stations. It goes beyond the existing zoning laws. It identifies areas that jurisdictions may consider peak growth areas in the future.
Second, our region has historically underproduced housing. We are not on track to hit our Plan Bay Area 2040 housing projections. However, Plan Bay Area 2050 has new housing strategies that are designed to enable a faster trajectory for housing growth, particularly in low- and very low-income levels where it is much needed.
- **Fernando Marti:** Bayside cities produced less housing growth than the three big cities that produce roughly half of the housing. Does that also include high opportunity/high resource cities? How well did high resource/high opportunity areas do in producing housing?
Second, in Plan Bay Area 2050 projections, maps emphasize growth around job centers like Silicon Valley. Does the Blueprint also look at differential allocations of affordable and market rate housing? If not, how do you align affordable versus market rate housing locations that RHNA process calls for?
 - **Vautin:** Many Bayside communities (not all) that have had lower housing production over the past decade tend to be the higher resource places that are concerned about new growth. The Draft Blueprint shows more growth in Bayside cities than we have seen in recent years, in part because we incorporated some high resource areas into the growth plan. There is more room for growth there, but we are making headway compared to the last plan which did not have much growth in high resource areas.
For breakdown by income, yes, we do simulation modelling at the different income levels. We have metrics in materials posted online that show where low-income households are in the Draft Blueprint. We are also doing some continued analysis on how the Blueprint does in terms of jobs-housing fit.
- **ShIPLEY:** Clarified that there are some hands raised by people who have already spoken, and new voices were prioritized first, per the norms adopted by the HMC last year.
- **Pappas:** Is the low projection of housing growth for Alameda, SF, and other traditionally transit-served areas associated with continued displacement in those communities?
 - **Vautin:** To clarify, there is not less housing projected in those areas – there is more than in previous PBAs – just a lower share of the total housing. It is very difficult to get to the causality of displacement metrics. We are exploring it further and have reported about areas of concerns. We want to improve the performance.



- **Pappas:** If you are projecting continued demand for market rate housing, which will displace lower-income people in those areas, and yet there is not a substantial amount of growth in housing – affordable and market rate – in those areas, then there is a disconnect of what people want to see in the model, and what the model predicts will happen?
- **Vautin:** We have an interest in providing a pathway to opportunity and have been trying to focus some of the affordable housing in high resource areas because it provides for upward economic mobility. But it is tricky because that necessitates market rate housing in lower-income areas which can drive displacement. We are continuing to work on it for the Final Blueprint.
- **Planthold:** Transit impacts where low-income people live. The Plan projects a certain amount of transit use, however COVID is resulting in the elimination of transit lines. Is there time to look at how the dramatic reduction in transit may impact where people will live?
 - **Vautin:** This is a very near- and immediate-term issue. There is not an immediate solution to the transit operators' deficits. The Final Blueprint will prioritize regional funding to get back to the 2019 service levels as soon as possible. We are trying to find ways to accelerate it sooner rather than later.
 - **Planthold:** Good to hear, thank you.

Zoom Comments Prior to Adams Presentation

- **Planthold:** "Deed-restricted?" Does that mean housing only for low-/ affordable income? Or, can that phrase include racially-biased covenants?
- **Abrams:** He meant that there is a deed restriction limiting rents. could be low or moderate/affordable rents/prices.
- **Fierce:** Yeah, we do a lot of terrible things still, but I'm pretty confident that we've completely ended racial covenants in terms of enforcement. Their legacy remains, of course.
- **Brown:** Solano County still needs cars.
- **Pappas:** Can you explain again why the South Bay receives such a large share of 2050 growth? How does it compare with current distribution of jobs and population and what drives the projected change in the future?
- **Planthold:** Folks, since Muni AND AC Transit are PERMANENTLY cutting MANY lines, does Plan 2050 have time and a way to modify its analyses & predictions before finalization? MUNI seems to plan [?HOPE?] for transit riders to shift to e-scooters, bikes, and e-bikes but shift back to cars. This mitigates against easy transportation options for seniors, people with disabilities and school-age youth. Can Plan 2050 call attention to the likely transit cutbacks and their effect on Plan 2050?
- **Semonian:** Is it possible to run our various draft RHNA methodology models through Urban Sim to find out how they fare for GHG reduction?
- **Riley:** Great suggestion Elise
- **Pappas:** Is the relatively lower distribution of housing growth in SF, Alameda, and other transit served counties be part of why low-income displacement continues in the forecast?



- **Macedo:** A couple of clarifying questions, for the housing growth assumptions, is the model capped based on existing zoning? I caution that the RHNA methodology may not limit consideration of housing sites based on land use restrictions. Also, are the 1.3M new households what the Bay area sees being completed over 30 years, eg. 43,000 a year or 346,000 over 8 years.
- **Marti:** Dave, you said half of production was in the big three cities, and relatively lower production in "Bayside" Cities. Would you say that it is also relatively lower production in high-source-high opportunity cities?
The RHNA process largely focuses on allocation of affordable housing and market-rate housing by geographies. The Blueprint maps show overall allocation of housing, do they also consider differentials of affordable and market-rate by different factors, as RHNA does, and if not, how will that align with RHNA?
- **Levin:** We can discuss this more in the discussion of relationship between PBA and RHNA, but what does it mean that PBA projects 30% of housing to be in the very low and low income categories, when RHNA requires planning for 40% in these two categories?
- **Strellis:** Hi Jeff - that's a great question. We are going to be covering that in agenda item 6.
- **Planthold:** It seems some who put something in chat box are being called upon before me, even before my queries were earlier. I did raise my hand. There seems a disjunction between asking a question in chat, raising a hand, and getting asked. I have been waiting longer to get my question asked. Might be a communications process needing fine-tuning. I have been waiting longer than others, but time is running out on this "clarifying questions" agenda item.

Public Comment on Plan Bay Area 2050 Draft Blueprint: Key Findings

- **Noah Housh:** Completely agreed with Josh Abrams. Wanted to know Plan Bay Area impacts due to limitations in how it is presented and our capabilities to respond to the plan.
- **Alfred Twu:** We need to plan to succeed, not plan to continue this housing crisis. Urged to put more housing in the higher income areas and urged to aim for a higher number.

6. RHNA Methodology Concepts (Information Item)

- **Shipley:** Explained that Gillian will present, and then do clarifying questions. Then, we will do the next presentation, and questions for both together since they relate.
- Presentation by Gillian Adams.

Zoom Comments Before Public Comments

- **Planthold:** ?Garbled? Re-link?
- **Levin:** Gillian's audio is breaking up. Can you repeat please
- **Fierce:** yeah, your upload bandwidth is trashed right now sorry
- **Levin:** I think she lost her connection
- **Planthold:** Any alternate presenters/ speakers from ...?
- **Fierce:** anyone know a good shanty wb Gillian
- **Planthold:** Cut-outs reminiscent of what was planned for in event of nuclear holocaust.



- **Marti:** Why does Solano County show up so high in the Blueprint baseline?
- **Riley:** And unincorporated Solano at that . . .
- **Walsh:** Option 1: Solano County unincorporated booming! Almost the entire county is on septic and well. Must be a mistake.
- **Brown:** To add to Matt: We like to grow food and flowers.
- **Riley:** Yeah that's not OK.
- **Fligor:** When do we vote on whether we want to use Plan Bay Area 2050 for RHNA?
- **Fierce:** does the Blueprint option use growth by jurisdiction as the baseline, or population share in 2030 as the baseline?
- **Strellis:** Hi Neysa - that's a great question. We will be discussing whether the committee wants to use PBA 2050 for RHNA and exploring if there is consensus around that point as part of agenda item 6B.

Public Comment

- **Aaron Eckhouse, Regional Organizing Director with California YIMBY:** Concerns that using PBA baselines might conflict with the direction this committee has already been going. Particularly along the Peninsula and SF – areas that offer high access to opportunity and excellent jobs proximity but would see greatly reduced housing growth under PBA. Expressed concern about a disconnect between growth and transit service and stressed consideration of additional housing in San Francisco and Berkeley.
- **Shajuti Hossain, Public Advocates and 6 Wins for Social Equity Network:** Urged the committee to strengthen their commitment to equity and continue to center the role race plays in all of our systems, including housing. Emphasized the impacts on our Black and brown neighbors, co-workers, and family. Asked for the HMC to have more discussion on the proposed evaluation criteria and come to an official decision on whether they are the right criteria or need to be adjusted. Noted that 6 Wins is opposed to the PBA Blueprint being used as a factor or the baseline in the methodology because it fails to spread out the RHNA across the region. Expressed strong preference for the bottom up approach because the income shift would severely increase displacement risk in too many vulnerable communities and cities. Suggested grouping income categories according to SB 35 for the bottom-up approach, with above moderate income in a separate group and the remaining three categories in another group. The lower and moderate income housing rely on public subsidies. Lastly, stated strong preference to use household totals from 2019, as the Plan Bay Area baseline would leave out too many high opportunity area jurisdictions.
- **Auros Harman:** Spent entire adult life all over the Bay Area. Current resident of San Bruno and serves on the Planning Commission there. Echoed statements about the Plan projecting too little housing growth in high opportunity areas. Stressed the need to be much bolder to address systematic inequities that we have created intentionally through public policy through the 20th Century and emphasize building enough housing to reduce the market rate down and broaden housing accessibility for median income folks. Urged staff to put our overall housing between 800,000 to 1 million in the next cycle and allocate them where people already work.
- **Robert Fruchtmann:** Calling from SF. Urged the committee to allocate more housing to SF rather than the approach taken in the bottom-up concept. Noted that in the last decade, SF has added 200,000 jobs, and added 25,000 units of housing and stressed the



need to fix that disparity to stem the massive displacement of people from SF. The National Community Reinvestment Coalition identified eastern neighborhoods in SF as the fastest gentrifying in the country. In the same area, they expressed dismay that Oakland is also gentrifying from SF's job growth.

- **Steven Buss, YIMBY action:** SF resident. Agreed with Aaron, Robert, and Commissioner Harmon. We need to seek outcomes that significantly grow the housing stock in high opportunity, high density areas to minimize car travel. Put housing along existing transit lines in existing cities. Warned that SF population will be at 5 million people by 2050 but our current plans to not plan for that. Strongly urged to not push people out to outliers. Expressed huge concern that the highest growth was in outlier communities because it will push people into 2-3-hour commutes to Silicon Valley. We really need to build the growth where people want to live and where excellent jobs are so that people don't have to waste their lives sitting in their cars. Encouraged the path that reaches the highest growth in these areas.
- **Ira Kaplan:** Lives in SF. Noted that the housing shortage is most severe in areas with the highest housing prices. Areas like SF, Peninsula, South Bay near Stanford University are where the housing should go because that is where we see the housing shortage. These are also high resource areas. Emphasized putting housing in areas with access to jobs and high resources. Many schools in these areas suffer from under-population. There are not enough students because families got priced out. Adding housing would help sustain those excellent schools, which would be a shame to lose if there is not enough housing to provide enough students. For all of those reasons, there should be more housing in SF, the Peninsula, and northwest Santa Clara County.
- **Jesse Arreguin:** Noted that there are more speakers than what originally appeared, and the new time limit is one minute per commenter.
- **Sonja K Trauss:** Supported housing in high opportunity areas. Felt it was hard to tell which plan allowed for that and wanted clear information. It is tempting to load up the Peninsula because Cupertino and Palo Alto are so famous for having such a need for housing- such large lot sizes, such low density zoning. But other places are under RHNA'ed, like places in the East Bay. Where are the places with large lot sizes, single family homes, and that are extremely expensive? Being expensive is a way for people to tell that it is a desirable place.
- **Sarah Ogelby, YIMBY Action:** Living in SF. Mr. Vautin said that SF's ability to produce housing was defined by projects in the pipeline, and that small parcels were unlikely to be re-developed. California has been crafting laws to break down segregation in SF, but SF still refuses to take decisive action. In the name of Black Lives Matter and all the calls for social justice happening on its streets, please stop pretending that SF's wealthy neighborhoods get off the hook another decade. Please allocate heavy portions of units there, beginning with Forest Hill. And please do not make my remote-working husband and others like him feel like they have to sacrifice a fair-weather, health conscious walkable region for career success.
- **Darrell Owens, East Bay For Everyone:** Strongly opposed the small size of the housing projection in SF, noting that we do not need more super mega development housing projects out in the suburbs of Santa Clara County. We need dense infill projects in the urban core where most people and jobs are. It is ridiculous to project a growth rate



higher for Oakland than for SF, when Oakland has nothing going on and SF has major office projects coming down. That is insane!

- **Marcus Helmer:** Lifelong Napa County resident where wealth and opportunity abound. Noted it is no secret why our poverty rate is so remarkably high - housing. Referred to other comments, and mentioned that In Napa, we are planning for more jobs than housing. We are not building enough housing where there are jobs and resources. And it is having far reaching and disastrous consequences. Address that please. Thank you.
- **Lucia Sanchez:** Requested that ABAG commissioners allocate more housing to high opportunity areas. My family lives in Solano because it is the only county they can afford, but most of them work outside Solano. So right now, you are in the position where you are able to help families like mine. The impact of building so little high-opportunity housing worries me because you are letting the community know that you are okay with status quo. Urged again to allocate more housing to high opportunity areas like Solano County.
- **Jordan Grimes, Peninsula for Everyone:** Lifelong resident of San Mateo County, called it "pitiful" to add such a small amount of housing in such wealthy areas like San Mateo County, the Peninsula and SF since we spent years not building enough housing there.
- **Fred Castro:** That was the last public comment. One was received by email which is available in the email packet sent out earlier, and online.

6b. RHNA Income Allocation: Further Discussion of the Regional Housing Needs Allocation (RHNA) Income Allocation Methodology

- Presentation from Eli Kaplan
- Afterwards, people can decide which allocation they prefer
- **Shiple:** Re-iterated what is coming up, and what the questions should focus on

Clarifying Questions from Eli and Gillian's Presentations

- **Levin:** What guidance do we have from HCD about what it means to be consistent between RHNA and Plan Bay Area? What is the threshold we have to pass? Expressed great discomfort with implementing Blueprint in any way and asked about other ways to demonstrate consistency. Also concerned that Blueprint calls for 30% very low- and low-income housing while the RHND requires us to plan for 40%, so there is already a disjuncture between the Blueprint and RHNA. Can staff comment on implications of that?
 - **Vautin:** Historically, when ABAG evaluates consistency, it is based on the jurisdiction totals, and not based on any income level data. So that issue might be a moot point because the statistics are of a different type. When we talk about low-income in the Plan, we have broken the region into quantiles for income categories. Those brackets are different than ones used by HCD, so the 30% low-income in the plan versus 40% in RHNA involves comparing different thresholds. Comparing them is like comparing "apples to oranges."
- **Marti:** Asked why Solano County shows such a high rate of growth in this model.
 - **Vautin:** Solano County's unincorporated population is the smallest of all the counties. Noted that the actual number of units is relatively small but because the growth is expressed as a percentage it appears high.



- **Brown:** Expressed frustration at the lack of clarity around the numbers and the lack of time to digest them. Noted she is not ready to make a decision as a result of this lack of clarity.
- **Fierce:** Question about the two options. Does the Blueprint option use growth by jurisdiction as the baseline value, or is it population share in 2030?
 - **Adams:** It is based on household growth.
- **Eklund:** Expressed confusion about option 1 and 2 [referring to page 106 of the packet]. Asked if option one included the last three items on each individual chart, and if option two included the first three.
 - **Kaplan:** The meeting packet contains a series of charts that show the number allocation to each jurisdiction under these different scenarios. It does not include percentage of growth, which we can include in the future. In the chart, the first bar is not a methodology we are considering. Explained the household baseline allocation, the housing jobs crescent methodology under different baselines, and the Blueprint allocation with no additional factors. The last methodologies apply the Blueprint baseline to other methods we are discussing.
 - **Eklund:** So the Blueprint allocation is option 1?
 - **Kaplan:** Correct
 - **Eklund:** The other bars are option 2?
 - **Kaplan:** Correct
 - **Eklund:** Requested clarification of the Housing-Jobs Crescent?
 - **Kaplan:** It is one of the methodologies created by HMC in March. There were three that got the most votes from the HMC and that group chose the name.
 - **Eklund:** Okay. We are spending thousands on this whole 2050 Plan Bay Area Draft Blueprint and eventually Final Blueprint to incorporate. We are spending so much time and effort to study it, why wouldn't we use it instead of just using 2019 households? It would be more updated and achieving more of the goals. If we do not use Blueprint, we should not make it, or change it into something usable.
 - **Shipley:** That is for HMC to hash out together. Staff has presented pros and cons of various perspectives. It is a decision point you will arrive at and make a recommendation to ABAG staff. Hopefully hearing from each other will help that.
- **Pappas:** The reason we may not use the Plan Bay Area Draft Blueprint is because we may want to respond to the current conditions people are living in. We used 2019 household distribution in our exercise. The maps interact differently with different factors considered. When I played with the map tool, the colors were indicative of change but did not provide the whole picture. Can we get a version of the tool that has the numbers so we can understand what it means to use Plan Bay Area as a baseline?
 - **Kaplan:** We hope to be able to build different baseline options in the tool before August meeting.
- **Walsh:** Solano County does not have the population of other Bay Area counties, but our growth rate is still over 20 percent in the Blueprint. This seems to indicate a mistake in assumption. Unincorporated Solano County has no city services, no PDAs, no transit



centers, no city centers, and no job centers. Expressed strong dissatisfaction with the Blueprint. It does not feel “reasonably accurate.”

- **Vautin:** All jurisdictions had opportunity to check data in 2019 through the BASIS initiative. That being said, we also apply strategies on top of that baseline data, so we will go back and look. But again, there are a very small number of housing units projected in the county. It is appearing to be a significant growth because there are so few units to begin with in the unincorporated areas.
- **Shrivastava:** How did you scale the Blueprint allocation? Did you take the number from the 35-year period and scale it down to RHNA period?
 - **Aksel Olsen:** Blueprint growth is about 1.28 mill. We take the growth pattern and make it fit the scale.
- **Ranelletti:** Are you looking for feedback today for baseline in general, or just where the Blueprint should be used as baseline? I am trying to figure out if the Blueprint will be used. I have feedback I would like to give for other options. Is that today or a future meeting?
 - **Shipley:** Ideally today, but we are time crunched and only have 15 minutes. But that is a conversation you need to have and a decision you need to make. If you are using the Blueprint in any capacity, they have provided a few different ways to use it.
- **Levin:** Repeated request for data tables, particularly for Appendix 6b. Noted the data was difficult to digest and requested additional time.
- **Ellen Clark:** Requested clarification of the meaning of “baseline” in both scenarios?
 - **Adams:** The baseline is a way to assign each jurisdiction a starting point from which additional factors might apply. We are presenting two different ways to assign the initial share. One is based on 2019 households, and the other is based on share of future growth forecasted in Plan Bay Area. The baseline is the starting place, and if we use other factors, they adjust the baseline accordingly.
- **Brilliot:** Can you explain how the indicator with the divergence index worked? It was the one at the end where the housing crescent did the best.
 - **Kaplan:** That metric was informed by conversations with stakeholders about how in the past there were jurisdictions whose share of the region’s RHNA was far lower than their share of the region’s households, and there were concerns that these jurisdictions tended to be those exhibiting more racial and economic exclusion. This metric tries to measure that by looking at jurisdictions that are above average in divergence score, with the most different racial demographics from the region, and also above average in their share of households above 120% of the Area Median Income. About 31 jurisdictions fit this description. This metric checks whether the RHNA allocations to those 31 jurisdictions are at least proportional to those jurisdictions’ share of the region’s households. Essentially, if one of those jurisdictions is 1 percent of the region’s households, we wanted to check whether they receive at least 1 percent of the region’s RHNA. There are some limitations and potential flaws to the metric, because it does not take into account relative jurisdiction sizes or how close to a “fair share” a jurisdiction got if it receives less than a proportional allocation.



- **Fierce:** Question about the evaluation metrics in Objective 5 stating that jurisdictions with a high percentage of households are living in high resource tracts. Suggested shifting the focus from what percentage of people live in a high resource area to what percentage of land is in high resource areas. Because it is possible that 1 percent of people in a neighborhood hold 90 percent of the land, and then everyone else gets less affordable housing because of that.
 - **Kaplan:** HCD consistently looks at percentage of people in those tracts. We can find a way to incorporate Victoria's suggestion too, but we were trying to address how RHNA methodology will be evaluated by the state.
- **Fligor:** How do we interpret the word "consistent?" The two options presented today, I am not in favor of either but I want to make sure we are consistent with Plan Bay Area 2050. Are there other ways for us to be consistent with Plan Bay Area 2050?
 - **Adams:** The statute says that RHNA needs to be consistent with PBA 2050. Any other insights from Tawny at HCD?
 - **Macedo:** You're right, looking at the consistency from both plans is left fairly wide open. I can bring more context for more clarity.
- **Levin:** Are we only voting on option one or option two even though we are looking at a whole set of scenarios in the packages? Is 2019 households still an option for RHNA? Or we must choose between Blueprint as distribution and Blueprint as baseline.
 - **Adams:** We have provided two different ways to use the plan. One is direct allocation, and one is changing the baseline. Option 3 is not using the plan, and continuing to use 2019 as baseline, or discussing other baselines if the group is interested.
- **Levin:** Thanks, that greatly clarifies what is on the table.
 - **Vautin:** To add, the Blueprint is just a resource for you to consider. It may be the easiest way to make sure RHNA and the Plan Bay Area 2050 are consistent, but it is not required. If the HMC chooses not to use the Plan Bay Area 2050 Blueprint in the RHNA methodology, you just need to make sure the factors and weights you choose lead to a RHNA allocation that is consistent with the Blueprint. It may be trickier, but it may get you the desired results.
- **Marti:** Many of us are grappling with a decision between Plan Bay Area Blueprint baseline and 2019 households baseline. Is it possible to add in some of the factors that went into the Blueprint to the online RHNA visualization tool? There are certain things within the Blueprint that look good, but maybe people are uncomfortable with using the Blueprint as the baseline. But if it was possible to add some of those Blueprint factors to the tool, it might be good and the HMC could play with adding these into the methodology.
 - **Vautin:** The answer to that question comes down to how fundamentally different the RHNA process and the Plan Bay Area process are. RHNA is a math exercise and the Plan is more about using strategies as ingredients you put together. Is it possible to identify a data set and factor that aligns with each of the public policy ideas we explore in Plan Bay Area? Maybe, but it would be very complicated. There are 25 strategies at play that were approved by the MTC and ABAG boards, and some may not have a good mathematical factor ready to be used in the



RHNA methodology. It is not a clear cut yes or no, and it would be very complicated at this late stage of the HMC process.

- **Marti:** Are we constrained by mathematical questions? Could the HMC decide to consider development in specific locations like the 680 Corridor and allocate housing based on that rather than using a mathematical formula? Is that off the table as far as statute is concerned or can we add in strategic planning questions?
 - **Vautin:** Defer to Gillian. There is no region in California that has gone that route. Usually the approaches are very mathematical and focused on factors and weights related to the characteristics for each jurisdiction.
 - **Adams:** I have not seen anything like that. It is important to keep in mind the narrative. How would those places be chosen? There is value for the local governments that have to implement RHNA to have a sense that there is a formula in which they were all treated the same. We can use the Plan, which relies on local land use information, but we cannot limit RHNA based on local land use decisions. Your suggestion adds a level of complexity to the project that may not necessarily be helpful. But when you think about places where you want growth to go, what leads you to think of that place? Can we use that as a factor that gets applied to all similar places?
- **Shiple:** Urged HMC members to look again at the discussion questions and slides. What we need to hear from you, now or via email is what information you need to make a decision in August? What information do staff need to prepare for that discussion to move towards decision points and consensus as a committee?
- **Arreguin:** Would the committee be comfortable extending by 15 minutes to continue today?
 - **Various Participants:** Agreed to extend
 - **Shiple:** Noted there would not be any voting. Extra time will be used for discussion with a focus on the type of information HMC members are looking for from staff: maps, data tables, etc. What is still in your mind as you make decisions?
 - **Planthold:** Some people want to talk and work it out all at once and others do not. Some of us have already left the meeting. It is unfair to suddenly decide to extend the meeting. We should pick it up next time so people do not feel left out of the decision making process.
 - **Shiple:** Clarified that no decisions being made. Today, we only want to hear what you need. You can also communicate by chat or email to rhna@thecivicedge.com
- **Pappas:** Requested that the meeting's material be broken down into more manageable pieces and clearly identify the upcoming action items. Plan Bay Area and 2019 households are suggested as a baseline, so that is a clear question for us to take action on. People are raising some valid points on overall land area, there could be additional factors, and there is the income allocation approach we use to apply factors to the baseline. Can you help us narrow the field and move us toward action items that we can vote on and move forward?
- **Levin:** Reiterated the need to have the data tables to further clarify the housing projections. Noted a desire to see what happens in the bottom-up approach from merging moderate-, low- and very low-income housing together like in SB 35. It will



have tremendous implications for displacement-inducing development. What does all of this mean for equity and affirmatively furthering fair housing? Encouraged HMC to remember that the reason for RHNA and Housing Element Law is promoting racial and economic equity. Noted he is leaning towards using bottom-up approach on 2019 household baseline because it produces a more equitable and even distribution across the region. RHNA only dictates zoning so it determines where housing CAN be built, not that it necessarily will be built. In the last RHNA, we thought we were promoting smart growth, but the market would not build where we said it should and could not build where it wanted to. Warned the group against polarized distribution in RHNA. All jurisdictions should be doing something closer to their fair share in a way that allows the region to actually accommodate its need.

- **Shiple:** Reminder that this is a time for you to ask for information to make a decision.
- **Ranelletti:** First, I do not support using the Draft Blueprint as a baseline or an allocation. I have a sense that the committee for the most part agrees with that. I think we can have some sort of temperature check on that, through the red/yellow/green exercise and just get that off the table. Second, for August, I would like to see compared baseline 2019 households to jurisdiction land area. I think land area is the only fair common ground starting place. If we are basing it on households, that is incorporating our past inequities.
- **Marti:** Echoed what Jeff said earlier on importance of looking at the bottom-up approach by separating out above-moderate units from all the other income categories. There has been lots of feedback as people play with the toggles. I think there is consensus around exploring baselines that aren't Plan Bay Area. Maybe helping us think through the benefits of the different weights and factors? I simplified it to one factor for above-moderate units, and one factor for lower-income units. There is a lot of logic to using land area, and there is a particular logic, especially as we talk about big numbers, to thinking about the large sites and underutilized parcels in jurisdictions. Can underutilized sites (parking lots, one-story buildings) be integrated as a factor? How could we integrate these opportunities for development with the other factors we've been talking about so far?
- **Abrams:** There are options out there that we are not exploring. The tool encourages us to fit our thinking into a box. Strongly urged more creativity in thinking. I would like to see an expectation that cities with a jobs-housing gap work to significantly reduce it. I do not think we should be forcing low-income communities to grow if they do not want to. How do we discuss cities that have artificially kept their population low? None of these are possible conversations within the tool so maybe we can move beyond the tool.
- **Eklund:** Some people mentioned land area and it is important to look at buildable land area. Mentioned they were the minority vote for not including land with a large fire risk. Given what has been happening with PG&E, we can't build in those areas. I am leaning towards bottom-up approach for the Blueprint baseline. For any of these options, it is important for us to understand what it will mean for each particular jurisdiction. Some implications would absolutely set jurisdictions up to fail, and ABAG should not be any part of that. I need more information on what the implications mean. There should be no questions in mind about what each option means. Expressed confusion regarding jobs-housing crescent and does not recall voting on it. What does it include and what does it mean for each jurisdiction? What is the best person to email?



- **Shipleigh:** rhna@thecivicedge.com. We will combine all the emails.
- **Eklund:** Will that be sent out? Not everyone is on chat. I will need more time to talk to colleagues and staff.
- **Shipleigh:** Yes, and it is also in the chat.
- **Semonian:** I asked Eli if we had a way to use Plan Bay Area in the tools. It would be helpful so we can see how it can play out as a methodology or the baseline.
- **Shipleigh:** Great. I want to acknowledge that these are very complicated issues and confusion is understandable, as is the need for more time to digest. Noted the HMC will be reaching a decision point next month. Urged everyone to think about the discussion questions on page 19 for the August meeting.

Public Comment on 6B: Further Discussion on the RHNA Methodology

- **Aaron Eckhouse, California YIMBY:** Raised concern about evaluation metrics that use the percentage of allocation within the jurisdiction rather than total quantity. Acknowledged that this issue has been brought up before. Expressed concern similar to what we are seeing with Solano County – a large space, but a low number that misleadingly suggests there have been an appropriate allocation of affordable housing. It is more important to have higher quantities than higher percentages.
- **Steven Buss, California YIMBY:** Expressed confusion about metrics. It was presented as a tradeoff between lots of affordable housing or lots of market rate housing. High cost areas need both market rate and subsidized housing. We also need to provide opportunity for people who cannot afford market rate. Please plan for a lot of both types of housing in high cost areas. I disagree with the colors. Green should represent high growth, not red.
- **Noah Housh, Alternate for HMC from Cotati:** This was a difficult meeting for me. There has been a consistent pushback against using the Blueprint and a lot of our time on if we should use it. Desire to get the Blueprint off the table and move on. Hoped for next meeting to have more time for committee discussion and less time for staff “sales pitch.” Echoed comments from James, Neysa and Jeff’s comments. Stated that using existing household data used as a baseline is critical because it highlights the existing problems we are trying to solve for with these allocations. The Blueprint is a thirty-year growth model whereas RHNA is based on 8-year allocation cycle. The housing/jobs crescent was one of the top choices of the HMC. I support bottom-up approach or the housing/jobs crescent approach with the 2019 baseline.
- **Robert Fruchtman:** Calling from SF. I was originally confused as to which baseline to use. I made up my mind for 2019 household baseline because it is clear we get more housing. If we use bottom up approach and income shift data, SF would receive 85,000 new homes in next cycle. Compared to our past cycle and our jobs-housing numbers. It is not great, but it is the best of the bad options I think we have.
- **Anna Driscoll, Enterprise Community Partners:** Reaffirmed bottom-up approach with 2019 baseline. Now more than ever, we must acknowledge and directly counteract the harms of racist planning and policy that continue to impact the Bay Area housing system. We need to deliver on our statutory objectives and reduce housing disparities and how they continue to widen across racial lines. Since RHNA and PBA function on two different



timelines and scale, we support bottom-up approach rather than income shift approach. It best allows us to promote accessibility and prevent displacement.

- **Sidharth Kapur:** Echoed Anna's points. We have to affirmatively further fair housing as an SB 828 requirement. The Blueprint makes a lot of assumptions about what cities will want to up-zone. The baseline is not neutral and would hurt fair housing. It is based on status quo. It may be a violation.
- **Sam Deutsch:** SF resident. Echoed support for using the 2019 housing baseline. Mentioned climate – focusing on coastal development rather than further inland, allows people to live in a temperate climate and therefore rely less on heating and gas. It would promote sustainability and further our carbon reduction goals. Given how affluent the Bay Area is, the RHNA numbers should be much larger.
- **Kyle Kelley:** Lives in Santa Cruz, works in Los Gatos. Los Gatos is a high resource area that needs to have affordable housing alongside market rate housing, especially as big tech companies like Netflix, Barracuda, etc. continue building. Many people who come to work (baristas, grocery store workers, etc.) all come from Central Coast and Seaside area. coast and commute far because there is not enough housing. I do not want AMBAG to do more because ABAG did not aim high enough for affordable housing.
- **Arreguin:** No public comment submitted; agenda item completed.

Zoom Comments:

- **Pappas:** Will we have the opportunity to re-do the income shift and bottom up exercises using Plan Bay Area as a base line? Or see more analysis from staff? It would change the calculus for us as we consider if or how to incorporate Plan Bay Area as well as the various factors. The exercise we did used 2019 household distribution rather than plan Bay Area
- **Brown:** Schools are "good" because of money. Many teachers spend a lot of their own money to help students. Very not happy with that one persons comments.
- **Nickens:** I would like to push back on the public commenter that said that "Oakland has nothing." This is extremely problematic. Oakland is a beautiful, diverse, thriving city that is home to countless working class Black and Brown communities and other communities of color that form the backbone of our economy as our essential workers. Moreover, Oakland is a legacy city that has fought for generations to ensure that the Bay Area and the nation lives up to its promise, especially as it relates to civil and human rights for Black Americans. We must be very careful with our language and especially how we talk about communities that experienced historic state sanctioned disinvestment.
- **Fierce:** a point of information: Darrell is Black and *from* Oakland.
- **Fierce:** reposting this point of information since I didn't sent to "Everyone": Darrell is Black and *from* Oakland.
- **Brown:** So, does the blue print 2050 create more housing in the red portion of Solano, which has no water and infrastructure?
- **Pappas:** could staff share the numeric results of the combination of the factor methodologies with Plan Bay Area 2050 as a baseline similar to the outputs we were able to produce when using the tool?
- **Clark:** Yes, it's hard to undertand details from the tiny tiny maps



- **Walsh:** Yes Monica. And its based on some assumption that .uninc. Solano should expect a 22%+ growth rate. With no PDAs, transit centers, job centers, or public utilities, I have no idea where this came from.
- **Shrivastava:** For the Blueprint baseline number, is that for the 35-year period or is it adjusted to reflect the 2023-2031 RHNA period?
- **Brown:** I am not able to make a comment until I can go over all this material. Solano county makes no sense why? when there is no growth outside city limits.
- **Zipper Thomas (Privately):** Jess do we have another meeting after this one?
- **Olsen:** 2019 hh in unincorporated Solano is around 6,800
- **Gentry:** In Attachment A to Item 6a what does "scaled to RHND" mean for the Blueprint allocation? Also, how is the 2019 household baseline being utilized for distributing the allocation?
- **Levin:** I agree with James' request - it would be very useful to have the data tables that sit behind the small graphs and maps.
- **Fierce:** I believe these bars are in the fourth attachment, "Item 6a 4 Attachment A"
- **Levin:** Why are we being presented today with only two options - using Blueprint as the distribution vs Blueprint as baseline? Everything we've been presented also shows various options using 2019 Households. Is that option 3?
- **Brilliot:** See agenda Item 6a 4 Appendix 2 to see how growth would differ by jurisdiction by methodology
- **Brilliot:** We are only allowed at this point to ask clarification questions and not make comments or provide feedback correct?
- **Levin:** Strongly agree with James comment/request.
- **Levin:** Not just the tool - can we get tables of numbers.
- **Strellis:** Hi Michael - yes this is still clarifying questions. Thank you for asking
- **Abrams:** Can we get the PBA projected number of jobs by jurisdiction and plan bay area population projection by jurisdiction?
- **Riley:** Thank you for your presentation Eli. I am scared by what I see for unincorporated Solano. How can this be consistent with what the HMC has discussed to date? How do we achieve consistency with PBA when it is a plan for 3 decades and RHNA is for less than 1 decade? The economic projections made over a 30 year period may play out, but NOT in the next 8 years - we will have at least half of this RHNA period in economic recovery from the pandemic. If the methodologies that we've discussed so far provide the needed consistency with PBA, then let's move on. We don't have 30 more years to move toward social equity.
- **Fierce:** I think we're all having a hard time understanding the visualizations. looking at the actual numbers in the attachment, Solano looks pretty fine, but the red can be startling because its relative to a smaller number
- **Riley:** That's a good point. The tables in the Appendix are much more clear
- **Fierce:** I've got another question here, more related to the metrics. Objective 5 says "Do x'sjx's with the largest % of HHs in high resource tracts receive a significant percentage of RHNA"
- **Brown:** I do not remembering seeing a map indicating that. Nothing has been decided and truly not happy with that answer.



- **Fierce:** and I'm remembering we had a strong opposition to population based factors and instead preferring for surface-area based ones. otherwise its plausible that a city where 1% of the people live in a neighborhood with 99% of the wealth, they'll score very differently than we expect
- **Macedo:** I'm interested in hearing the baseline suggestions.
- **Nickens:** Draft Blueprint: <https://www.planbayarea.org/2050-plan/plan-bay-area-2050-Blueprint>
- **Riley:** Can we poll the HMC on that baseline question now just to get a feel of where we are?
- **Semonian:** if we use baseline with housing units the communities that develop a lot of commercial/jobs and have developed little housing end up with low allocations, which doesn't make sense to me if they are proximate to good transit and have land available for development
- **Nickens:** Comment opportunities: <https://www.planbayarea.org/2050-plan/Blueprint/Blueprint-public-comment>
- **Paul:** Regarding Solano #s, a year ago I took a tour of a number of developments just beginning construction around the new Fairfield train/bus station. If I remember correctly, when built out they would include 2,000+ homes/apartments. Is that in an unincorporated part of the Solano county?
- **Abrams:** I want to make sure we talk about other baselines like 1) land area (rather than population) and 2) excess jobs (compared to housing) as the baseline.
- **Levin:** RHNA is essentially an exercise in dividing up the RHND (440,000 new units) among all jurisdictions. The "baseline" is an initial distribution, and then we apply various adjustments to that to come up with the final RHNA allocation. The 2019 household baseline says that if a jurisdiction has 1% of the region's households, it should get 1% of the RHNA. The adjustments are to give higher and lower shares based on different factors
- **Fierce:** I'd even suggest an inverse of land-per-capita rather than solely land. Piedmont and Emeryville come to mind, where they're both small for the region but wildly different population sizes
- **Nickens:** Survey: <https://mtcbata.typeform.com/to/vLNnYjUS>
- **Pappas:** Regarding the output charts on jurisdiction potential outputs there is so much variation in the results from different factors it would be really helpful to understand how different factors contribute and interact with the Plan Bay Area 2050 baseline distribution.
- **Levin:** Victoria you froze
- **Brown:** Did we agendaize that we were voting today?
- **Fierce:** we don't really vote though, we use the red/yellow/green approval system which then informs staff where we sit, more than a binary yes/no
- **Planthold:** ?Must we vote today? Considering a few have dropped off, would it be okay / better fi staff summarize & clarify input and have a vote at start of next mtg., or vote by e-mail before then?
- **Fierce:** I'll send this in an email later, but the information I need the most is to change the viz's to compare to previous growth patterns instead of comparing to a regional average. a commenter early on said something similar as far as undoing parts of history



- **Fierce:** that resonates with me
- **Semonian:** Would love to have time to talk to other planners in Marin and then give more feedback
- **Planthold:** YES. Resonates.
- **Abrams:** that's fine
- **Shrivastava:** yyes
- **Walsh:** I need more info on assumptions for Solano County growth in Blueprint. I this can happen offline.
- **Fierce:** sure, I'll second the motion
- **Brilliot:** I have to jump to another meeting.
- **Planthold:** NO to extend. Also another mtg., at 5 pm.
- **Brown:** I have another meeting. must leave at 5pm.
- **Riley:** I have to jump - cannot extend. Will stay as long as I can.
- **Planthold:** Extension not fair to those who have to or already had to leave.
- **Bonilla:** send an email
- **Fierce:** Yeah, send an email. discussion with fellow participants offline isn't barred
- **Brown:** I believe that we can send emails that can be sent out to everyone.
- **Riley:** Agree with James!!
- **Semonian:** Would be good to know if PBA 2050 and the "calculator" take into account land/development area
- **Clark:** They should, to some degree, to extent existing land use/zoning was an input into the model.
- **Brilliot:** Good point Jeff
- **Nickens:** +1 Jeff!
- **Shrivastava:** i agree with Jeff
- **Fligor:** I like Amber's questions: (1) do we support Plan Bay Area 2050 for direct allocation or baseline allocation; (2) do we support using HH 2019 instead; and (3) do we have other suggestions for the baseline. Also, would appreciate getting clarity on how we ensure RHNA is consistent with Plan Bay Area if we decide not to use the Plan for direct allocation or baseline allocation.
- **Semonian:** Will there be a workshop on the Blueprint that we can attend before we meet again?
- **Riley:** If we are going to red/yellow/green let's do it now!
- **Riley:** I have to jump off for a prior commitment, yet we are still going. I vote NO Blueprint.
- **Nickens:** Yes Elise. I posted the link above but there are jxdn specific virtual workshops throughout the month. Here's the link again. <https://www.planbayarea.org/2050-plan/Blueprint/Blueprint-public-comment>
- **Semonian:** Thanks!!
- **Levin:** I would like to see the next meeting have less informational presentation and more discussion and decision making. This will require that all of us review the informational materials in advance, but we are running out of time and should be using our meeting time to discuss alternatives and come to some consensus on recommendations.
- **Shibley:** no decision point today - just hearing what you need to get there in August



- **Semonian:** I agree with Jeff above - more time to discuss
- **Fierce:** for consensus building and intent signalling purposes: my preference at this moment is HH 2019 with income shift, but I also want to know why the income brackets are different between PBA and RHNA
- **Nickens:** I agree w/ Jeff's reco. The informational presentations could be sent in advance along with the packet materials. Also fyi many of these informational presentations are presented to the MTC/ABAG boards before our meetings which are all available for the public to view at <https://abag.ca.gov> and <https://mtc.ca.gov>.
- **Fierce:** available buildable area is a function of local zoning which is totally within a city's control. I don't think it should be a factor because it veers into consideration of historic performance.
- **Strellis:** Please email rhna@thecivicedge.com with your comments
- **Levin:** Page 100 of today's PDF explains what factors were used for Jobs/Housing Crescent and the 3-factor Bottom Up approaches.
- **Pappas:** Land area that is not local, state, or federal park land or a priority conservation area would be a helpful component per Pat's suggestion and Josh's suggestion on job/housing imbalances
- **Levin:** That's exactly why we need the data tables behind the charts in Item 6B Appendix
- **Walsh:** Land area as an option can only work if many things are excepted out: agriculture, parks/open space, areas that don't have urban services available, etc. Keep it to urbanized lands only.
- **Fierce:** also: quick shout out to whoever made the bar charts. thank you for using colorblind friendly colors, please make sure that translates to our maps
- **Pappas:** UrbanSim's methodology is part of why Plan Bay Area 2050's housing distribution is resulting the way that it is. Some types of small parcel infill housing have historically been difficult to build because there are both zoning and process barriers as well as construction cost barriers that urban sim may be reacting to that gives preference to large parcel redevelopments in the South Bay. There are strategies that could also help address these barriers to small infill
- **Abrams:** thank you staff. It's a hard job!

Public Comments on Items Non-Agenda

- **Steven Buss, YIMBY Action SF:** General comment about the colors chosen for maps. Red should not indicate high growth. It implies to the viewer that is a bad thing, which is not the case. Color choices inform how people understand the graphics. Either totally neutral colors or frame it to indicate that growth is good.
- **Kyle Kelley:** Suggested the color palette viridis to accommodate for any visual impaired people and pre-conceived color assumptions.
- **Castro:** 10 comments submitted by email, also posted online.
- **Arreguin:** Thanks for your time. I agree that the next time we meet, we should vote on Blueprint or not so we can go from there. The next meeting will be on August 13.



TO: Housing Methodology Committee

DATE: July 29, 2020

FR: Deputy Executive Director, Policy

RE: HMC Member Correspondence

Overview

This memo provides an overview of the correspondence received since the July 9 meeting.

1. 7/7/20 Victoria Fierce - Can we get an update on state legislature activities at our next meeting?

Hi, RHNA facilitators.

There's a few bills in Sacramento coming down the pipeline that will affect housing and in some cases directly affect the RHNA process. One that comes to mind is AB-1063.

https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=201920200AB1063

I'm sure there's others that ABAG/MTC's legislative lobbying staff could list, so my ask is if we could get a quick presentation from staff on some of these housing bills at our next meeting? I don't mean this coming one on the 9th, but the one after that. I think its important for the group to have some idea of the tools being developed that can either help or harm the RHNA process and how cities meet their bare minimums as we inch closer towards a final methodology. It's certainly changed since we started last year, but as a member who does remember what people say during meetings I know that a number of my colleagues still think the whole process is a waste of time without any help from the state, despite the fact that there is very real help being pushed for at the state level. That's disempowering, and if RHNA is perceived as not having legitimacy then it really doesn't matter what numbers we come up with in the end.

2. 7/13/20 James Pappas – Suggestions

I can make it on the 13th. Were staff also looking for suggestions about how to proceed? And for dialogue between group members over the next month? It seemed like staff were asking for that but I don't understand the best way to contribute.

I would strongly suggest that staff and consultants leave more time for committee member discussion as well as activities to decide specific questions such as:

- Whether to use 2019 households as the baseline or Plan Bay Area 2050- and whether an additional factor like land area can be added in?
- Whether to use bottom up or income shift for the income group distribution?

- Which of the factors to incorporate? And at which percentages for the allocation? (i.e. high opportunity areas, jobs-housing balance and jobs-housing fit, transit access etc.)

Thanks-

James

3. 7/14/20 Bob Planthold – Resource Sharing

<http://beyondchron.org/will-democrats-end-segregation/>

4. 7/17/20 Bob Planthold – Resource Sharing

<https://www.sfexaminer.com/opinion/450000-new-homes-for-the-bay-area-where-will-they-go-and-who-will-decide/>

5. 7/28/20 Bob Planthold – Resource Sharing

So, if \$\$ for affordable housing drops substantially,

what can / should HCD do to address that funding gap

so that aff. housing can be built?

<https://www.sfexaminer.com/news/funding-for-affordable-housing-expected-to-fall-short-of-needs/>

Bob Planthold

6. 8/4/20 Bob Planthold – Resource Sharing

Please consider passing along to our RHMC group,

despite the possible partisan reference in the story's headline.

NOT composed by me.

<http://beyondchron.org/rejecting-trumpism-massachusetts-moves-toward-passing-housing-choice/>

Bob Planthold

7. 8/6/20 Bob Planthold – Resource Sharing

An editorial, or sorts, from the SF Chronicle editorial board.

<https://www.sfchronicle.com/bayarea/article/There-s-no-stopping-it-Bay-Area-cities-15462259.php>

Bob Planthold



WELCOME

ABAG Housing
Methodology Committee

August 13, 2020



REFINING METHODOLOGY CONCEPTS

ABAG Housing
Methodology Committee

August 13, 2020

Today's agenda

- Brief presentation by staff, with **most time devoted to committee discussion**
- Continue conversation about using Plan Bay Area 2050 in the RHNA methodology
- Discuss key decisions for finalizing structure of RHNA methodology:
 - Which *baseline allocation* should the methodology use?
 - Should we *incorporate Plan Bay Area 2050* in the methodology, and if so, how?
 - What *income allocation approach* should the methodology use?
- Once decisions about structure are in place, discuss *factors and weights*
- Confirmation about *performance evaluation metrics* at meeting on August 28

Should Plan Bay Area 2050 be used in the RHNA methodology?

- At July HMC, staff presented two options:
 - Use the Blueprint as the sole factor for allocation RHNA units
 - Use the Blueprint household growth distribution as the baseline allocation
- Some support for using the Draft Blueprint, but also concerns about its emphasis on growth in the South Bay
- Lots of discussion, but no conclusions

Should Plan Bay Area 2050 be used in the RHNA methodology?

- There is alignment between the Plan and RHNA/HMC priorities
 - Draft Blueprint achieves many positive housing- and equity-related outcomes
 - Housing near jobs and to communities exhibiting racial and economic exclusion
- And also critical differences between the Plan and RHNA process/outcomes
 - Both must meet multiple objectives, but different statutory priorities
 - Plan implementation is based on incentives; RHNA compels local action
 - Forecasted development pattern could adjust between Draft Blueprint and Final Blueprint
- Using the Plan's Blueprint in the RHNA methodology would:
 - Communicate that we are moving toward a unified vision for the Bay Area's future
 - Accelerate toward a more equitable and less segregated land use pattern in the near-term as a bridge to Plan's future vision
- **Conclusion:** need to balance Blueprint growth pattern with emphasis on allocations to high resource areas, distributing RHNA units more evenly throughout the region

New Options for using Plan Bay Area 2050 in RHNA

1. New baseline allocation option using Future Year 2050 Households from the Draft Blueprint
2. Continue using 2019 household baseline, but **integrate new allocation factor using Future Housing Growth from Draft Blueprint**. Both concepts use this new factor alongside the Access to High Opportunity Areas factor, and both are paired with the Households 2019 baseline allocation.
 - a) One concept, *Bottom-Up - Balanced Blueprint/High Resource Areas*, uses the Bottom-Up approach.
 - b) The other concept, *Income Shift 125% - Balanced Blueprint/High Resource Areas*, uses the Income Shift approach.

Methodology Concepts using *Future Housing Growth* Factor

Bottom-Up - Balanced Blueprint/ High Resource Areas	Income Shift 125% - Balanced Blueprint/High Resource Areas
<p><i>Very Low <u>and</u> Low</i></p> <ul style="list-style-type: none"> • Access to High Opportunity Areas 70% • Future Housing Growth 30% 	<ul style="list-style-type: none"> • Access to High Opportunity Areas 50% • Future Housing Growth 50%
<p><i>Moderate <u>and</u> Above Moderate</i></p> <ul style="list-style-type: none"> • Future Housing Growth 70% • Access to High Opportunity Areas 30% 	

Building the methodology: baseline allocation

- Part 1 of RHNA methodology structure is choosing the baseline allocation
- Potential options:
 - Households 2019
 - Future Housing Growth 2015-2050 (Draft Blueprint)
 - Future Year 2050 Households (Draft Blueprint) - *New option*
 - Urbanized Land Area - *New HMC-requested option*
 - Existing jobs - *New HMC-requested option*

New baseline option: Future Year 2050 Households

- Staff proposal: total number of households in 2050 from the Draft Blueprint
- Middle path between options presented in July — considers a jurisdiction's existing households as well as its household growth from the Draft Blueprint
- More even growth distribution than Future Housing Growth baseline
- Aligns directly with Plan Bay Area 2050, thus incorporating transit, hazards, and market feasibility

New baseline option: urbanized land area

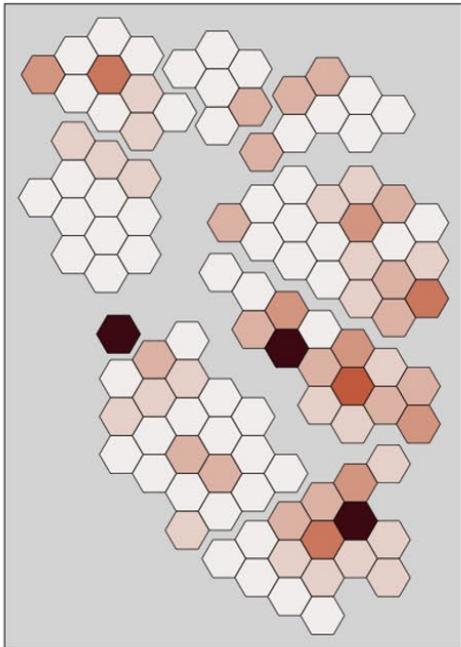
- Baseline using land area prevents past land use decisions from impacting RHNA methodology outcomes
- Methodology approach: Census Bureau definition of urbanized land area, excluding lands protected under federal or state programs
 - Uses publicly available data sources
 - Consistent with statutory language

New baseline option: existing jobs

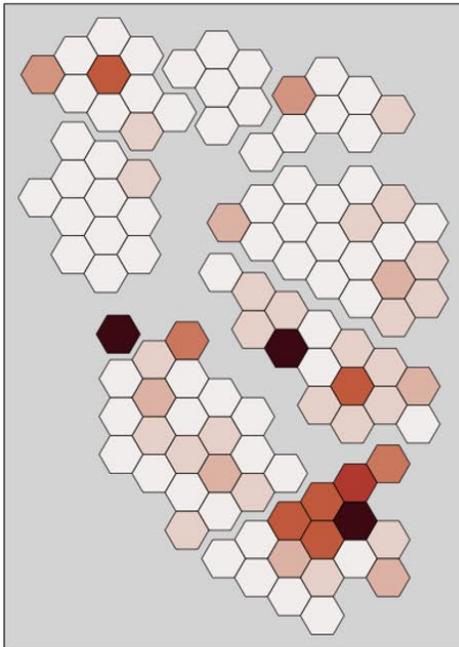
- Aligned with HMC goals confirmed at June meeting:
 - Directing more housing to jurisdictions with more jobs than housing
 - Focusing on the relationship between housing and jobs
- Methodology approach: Census Bureau LEHD data about total jobs (most recently updated in 2017)

Considering baseline allocation options

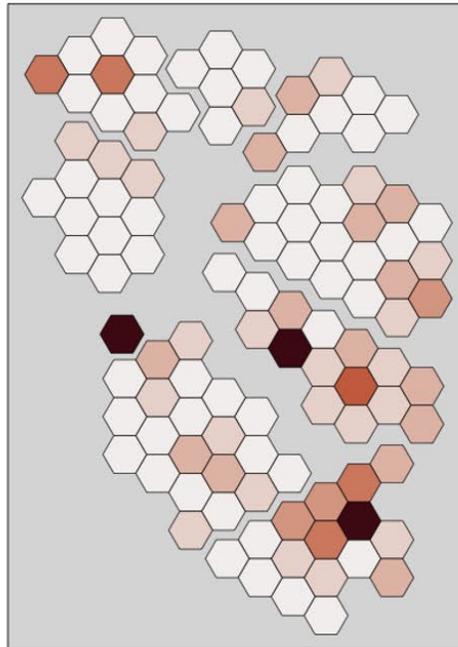
Households 2019



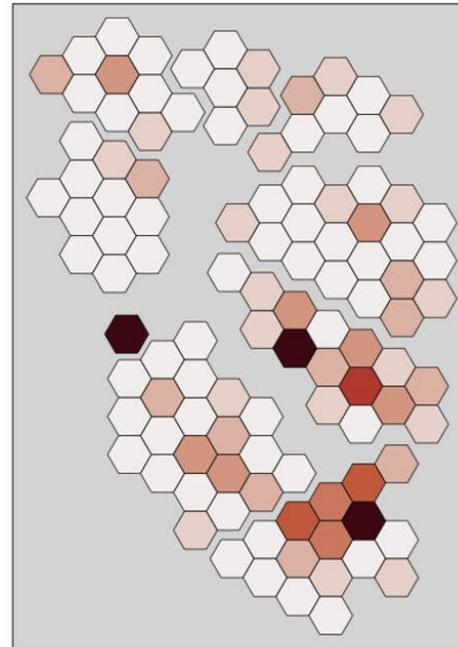
Housing Growth (Blueprint)



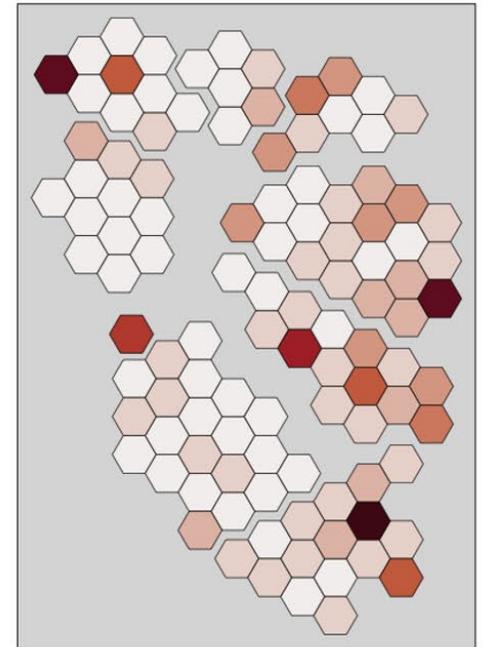
2050 Households (Blueprint)



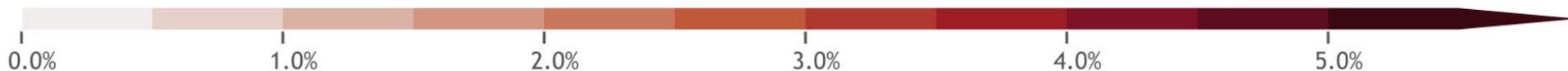
Existing Jobs



Urbanized Land Area

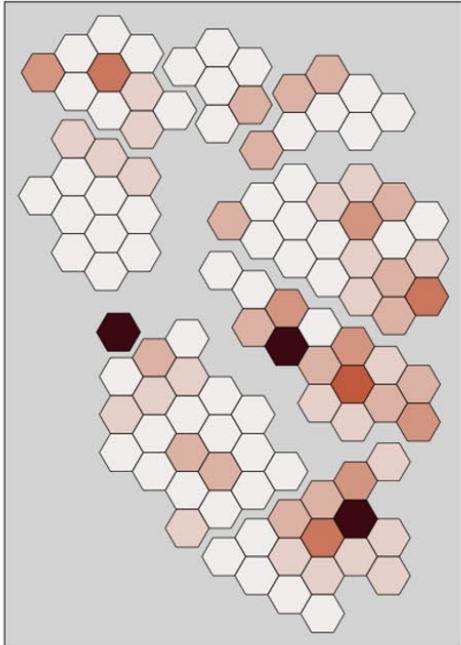


Percent of Total

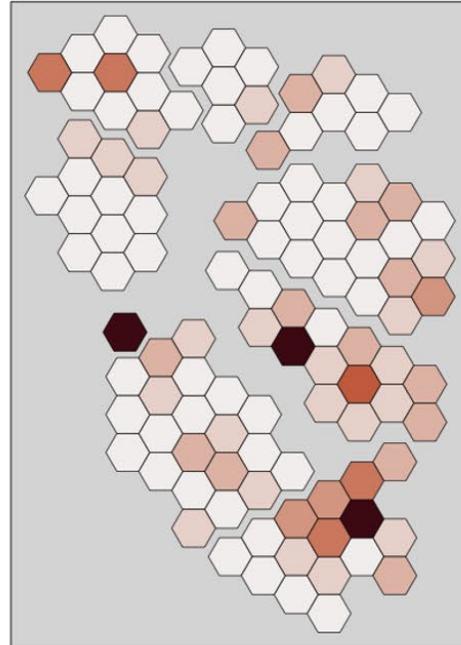


Baseline allocation options for today's discussion

Households 2019



2050 Households (Blueprint)



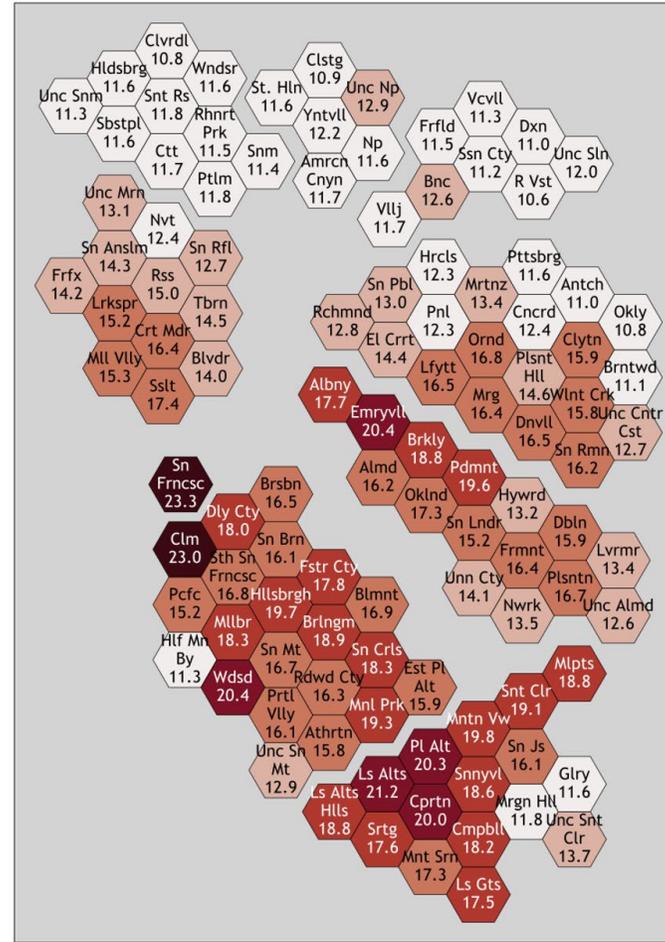
Percent of Total



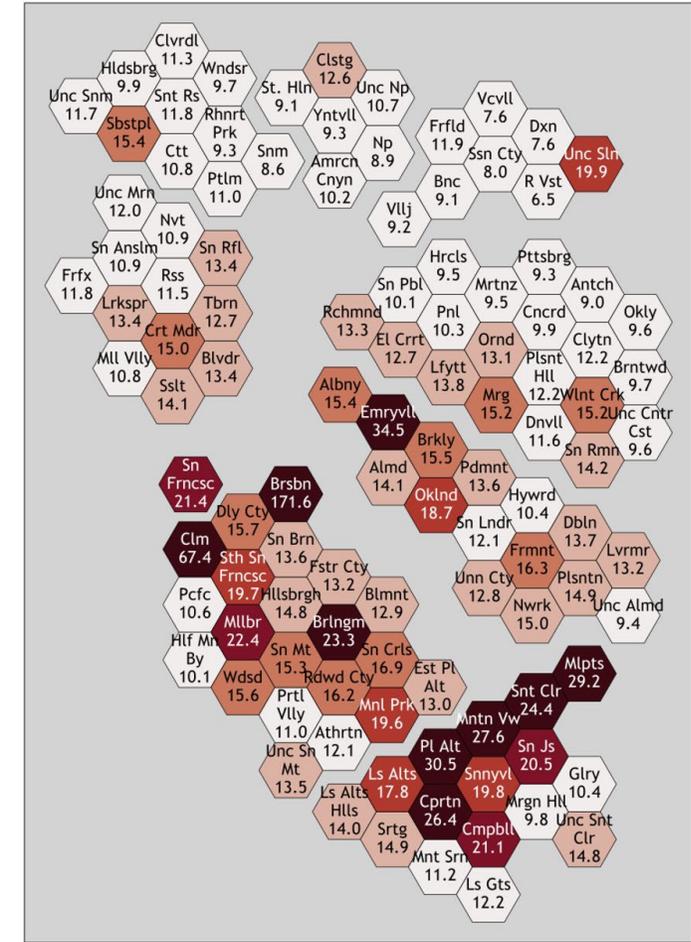
Effects of different baselines on allocation patterns

How does the **Bottom-Up - 3-Factor** concept differ when using the Households 2019 baseline (on the left) compared to the 2050 Households (Blueprint) baseline (on the right)?

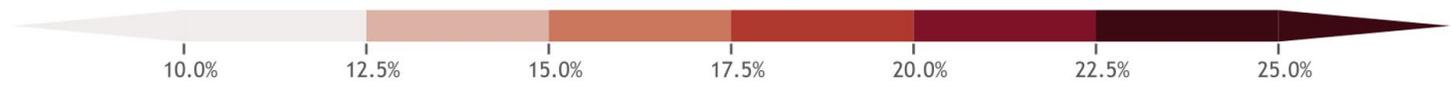
Bottom Up 3-Factor Concept
(Bsln:Households 2019)



Bottom Up 3-Factor Concept
(Bsln:2050 Households (Blueprint))



Jurisdiction Growth Rate

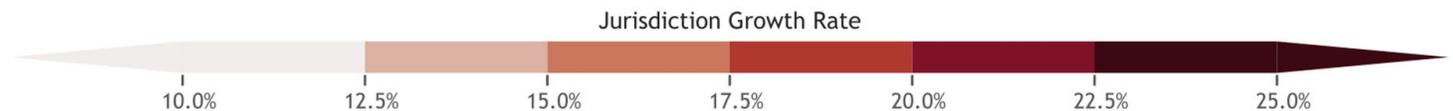
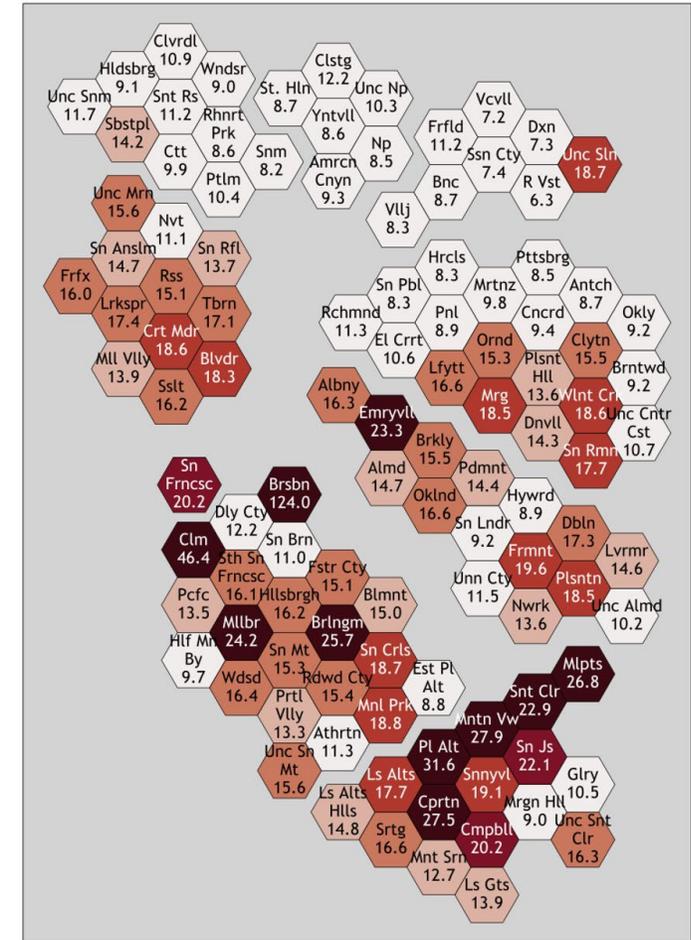
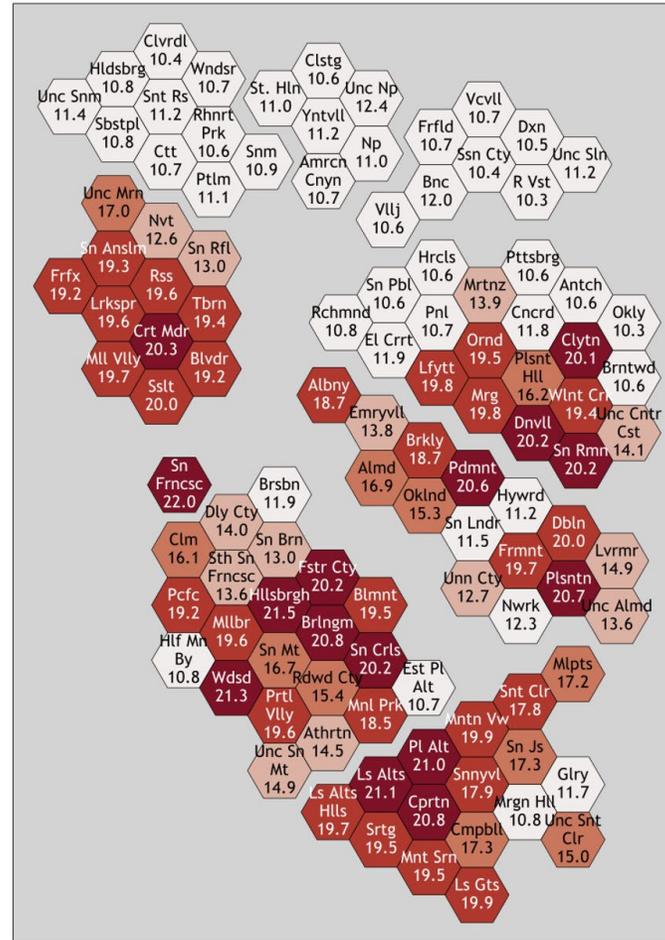


Effects of different baselines on allocation patterns

How does the **Income Shift 125% - Housing/Jobs Crescent** concept differ when using the Households 2019 baseline (on the left) compared to using the 2050 Households (Blueprint) baseline (on the right)?

Housing/Jobs Crescent + 125% Income Shift
(Bsln:Households 2019)

Housing/Jobs Crescent + 125% Income Shift
(Bsln:2050 Households (Blueprint))

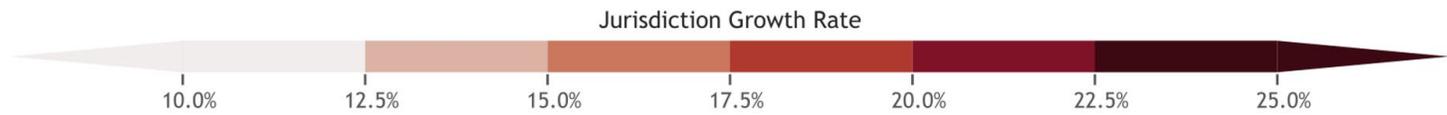
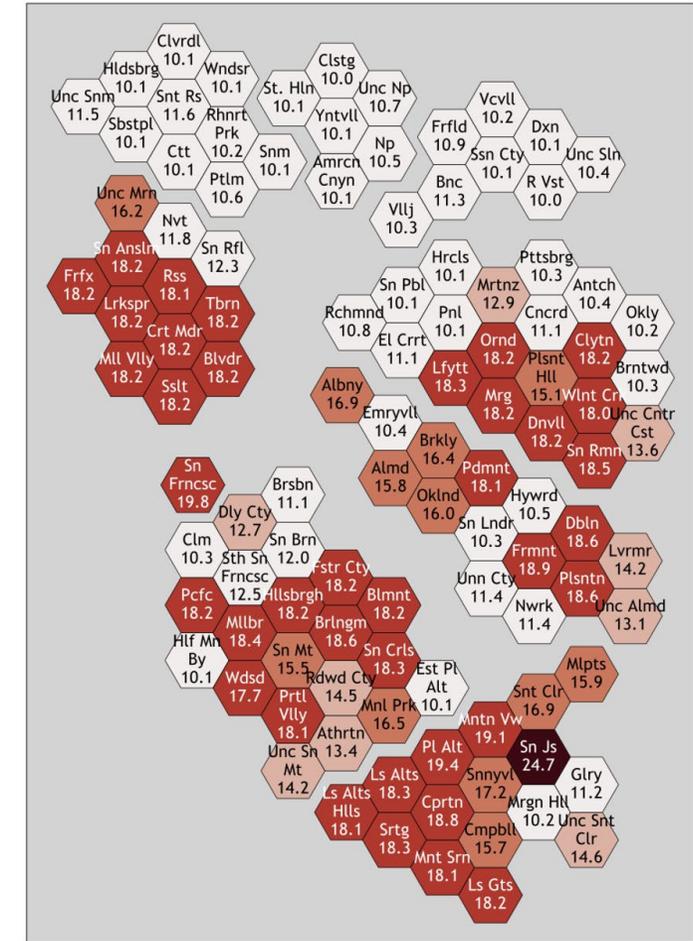
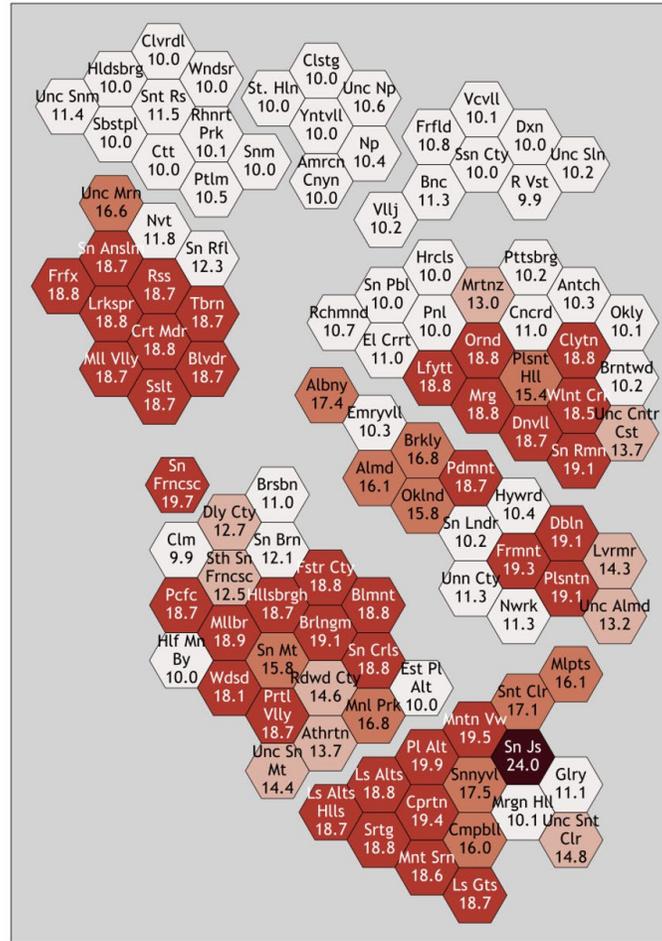


Alternative: Blueprint as factor?

Balanced Blueprint/High Resource Areas + Income 125% Shift (Bsln:Households 2019)

Bottom-Up Balanced Blueprint/High Resource Areas (Bsln:Households 2019)

How does the **Balanced Blueprint/High Resource Areas** concept differ between the **Income Shift** approach (on the left) and the **Bottom-Up** approach (on the right)?



Building the methodology: income allocation

- Part 2 of RHNA methodology structure is choosing the income allocation approach
- Potential options:
 - **Income Shift:** total units allocated first, then Income Shift moves the local income distributions closer to the regional distribution. A jurisdiction that has a higher percentage of existing households in a given income category compared to the region receives a smaller share of units in that income category, and vice versa.
 - **Bottom-Up:** factors are used to determine allocations for the four income categories, and the sum of these income group allocations represents a jurisdiction's total allocation

Regrouping income categories for Bottom-Up

- HMC proposal from July: allocate moderate-income units using same factors as very low- and low-income units
 - In the Bay Area, moderate-income units are not generally produced by the market; producing lower-income and moderate-income units requires some type of policy intervention.
 - Better aligns with Streamlined Ministerial Approval Process established by Senate Bill 35 (2017) and modified by Assembly Bill 1485 (2019)

Analysis of Six Methodology Scenarios

- Staff analysis focused on two baseline allocation options: **Households 2019** and **2050 Households (Blueprint)**
- Using these two baselines, staff looked at six methodology scenarios:
 1. Bottom-Up - 3-Factor Concept
 2. Bottom-Up - 3-Factor Concept with Adjusted Income Groupings
 3. Bottom-Up - Balanced Blueprint/High Resource Areas
 4. Bottom-Up - Balanced Blueprint/High Resource Areas with Adjusted Income Groupings
 5. Income Shift 125% - Housing/ Jobs Crescent
 6. Income Shift 125% - Balanced Blueprint/High Resource Areas

Consistency between RHNA and Plan Bay Area

- By statute, RHNA must be consistent with Plan Bay Area; however no guidance in statute
- ABAG/MTC proposed approach:
 - Plan Bay Area 2050 output: household growth at the county and subcounty levels
 - Compare 8-year RHNA housing growth to 30-year Plan Bay Area 2050 housing growth
 - If the 8-year growth level does not exceed the 30-year growth level at the county or subcounty levels, then RHNA and Plan Bay Area 2050 will be determined to be consistent
- Consistency evaluation indicates no issues for six methodology options paired with either Households 2019 or 2050 Households (Blueprint) as baselines

Performance on evaluation metrics

- All six methodology scenarios appear to further the five statutory objectives when paired with either baseline (Households 2019 or Future Year 2050 Households)
- Methodologies using the Bottom-Up approach tend to perform best on evaluation metrics
 - Bottom-Up - 3-Factor methodology had best performance on nearly every metric (paired with either baseline)
 - Bottom-Up - Balanced Blueprint/High Resource Areas methodology (Households 2019 baseline) also performed strongly across the metrics

Performance on evaluation metrics

- *Objective 1 metric: Do jurisdictions with the most expensive housing costs receive a significant percentage of their RHNA as lower-income units?*
 - **Most effective: Bottom-Up - 3-Factor** (with either baseline) and the **Bottom-Up - Balanced Blueprint/High Resource Areas**
- *Objective 2 metrics: Do jurisdictions with the largest share of the region's jobs have the highest growth rates resulting from RHNA? Do jurisdictions with the largest share of the region's Transit Priority Area acres have the highest growth rates resulting from RHNA?*
 - **Most effective: Options using data from the Draft Blueprint**, either using 2050 Households as the baseline or the Future Housing Growth allocation factor

Performance on evaluation metrics

- *Objective 3 metric: 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?*
 - **Most effective: Bottom-Up - 3-Factor options** (regardless of the baseline they are paired with)
- *Objective 4 metrics: Do jurisdictions with the largest percentage of low-income residents receive a smaller share of their RHNA as lower-income units than jurisdictions with the largest percentage of high-income residents?*
 - **Most effective: All Bottom-Up options**, the Bottom-Up - 3-Factor (with either baseline) and the Bottom-Up - Balanced Blueprint/High Resource Areas

Performance on evaluation metrics

- *Objective 5 metrics: Do jurisdictions with the largest percentage of households living in High or Highest Resource tracts receive a significant percentage of their RHNA as lower-income units? Do racially and economically exclusive jurisdictions receive allocations proportional to their share of the region's households?*
 - **Most effective:**
 - **Bottom-Up - 3-Factor options** (regardless of the baseline they are paired with) result in the highest shares of lower-income RHNA going to jurisdictions with the most access to opportunity.
 - **Income Shift 125% - Housing/Jobs Crescent options** (regardless of the baseline they are paired with) are most effective at ensuring that jurisdictions exhibiting racial and economic exclusion receive allocations proportional to their share of the region's households, seeing the largest ratios of RHNA relative to existing household shares.

HMC decision points and initial staff recommendations

DECISION



POINT

Decision Point #1: What baseline allocation does the HMC recommend for the RHNA methodology?

Initial Staff Recommendation: Use the 2050 Households (Blueprint) baseline because it captures the benefits of using the Plan Bay Area 2050 Blueprint in the RHNA methodology. It provides a middle ground between using Households 2019 and Housing Growth (Blueprint), since this option considers both existing households as well as expected future growth.

HMC decision points and initial staff recommendations

DECISION



POINT

Decision Point #2: If 2050 Households (Blueprint) is not selected as the baseline, does the HMC recommend using the Blueprint as a factor in the methodology?

Initial Staff Recommendation: If the 2050 Households (Blueprint) baseline is not selected in Decision Point #1, include the Future Housing Growth factor from the Blueprint. This would help to capture the benefits of using the Plan Bay Area 2050 Blueprint in the RHNA methodology, while retaining an alternative baseline.

HMC decision points and initial staff recommendations

DECISION



POINT

Decision Point #3: Does the HMC recommend the Income Shift or Bottom-Up income allocation approach?

Initial Staff Recommendation: Use the Bottom-Up income allocation approach, because it consistently performs the best on the evaluation metrics. It also allows greater flexibility to adjust the income allocations to direct more lower-income units to jurisdictions with a disproportionate share of higher-income households. Furthermore, it also directs fewer market-rate units to jurisdictions with a disproportionate share of lower-income households to reduce displacement pressures.

Next steps

- Use updated RHNA online visualization tool to further explore options discussed today
- On August 28, be prepared to discuss:
 - Preferences for factors and weights
 - Adjusting income groupings for Bottom-Up (*if HMC decides to move forward with this as income allocation approach*)
 - Performance evaluation metrics



PUBLIC COMMENT

ABAG Housing
Methodology Committee

August 13, 2020



WRAP UP AND NEXT STEPS

ABAG Housing
Methodology Committee

August 13, 2020

TO: ABAG Regional Planning Committee
FR: Deputy Executive Director, Policy
RE: Update on California State Housing Legislation

DATE: August 13, 2020

Summary

The 2020 legislative session was an unusual one in Sacramento, with the COVID-19 public health emergency spurring legislative leaders to narrow their focus. While housing and homelessness remained on their priority list, the compressed legislative calendar and budget constraints substantially reduced the total number of housing bills that were heard in committees and that will ultimately reach the Governor's desk. Below is an overview of the legislative landscape as it relates to housing production, protection and preservation (the so-called "3Ps"). A list and summary of the 3P bills that are still active as of the writing of this memo is included in

Attachment A.

Housing Production Legislative Packages

On May 19, Senate President Pro Tempore Atkins announced a housing bill package intended to bolster production of mid-density and affordable housing by creating new affordable housing production incentives (SB 1085 - Skinner) and opening commercial corridors to residential development (SB 1385 - Caballero). The package additionally includes bills aimed at streamlining the development process, including through establishing new optional tools for local governments to expedite production (SB 902 - Wiener), expanding by-right housing approvals for small multifamily projects (SB 1120 - Atkins), and expanding the existing authorization for streamlined California Environmental Quality Act (CEQA) judicial review to include a new affordable housing category (SB 995 - Atkins).

The Assembly has similarly prioritized a handful of production-focused bills, which include proposals related to zoning for missing middle housing (AB 725 - Wicks and AB 3040 - Chiu); opening commercial corridors to residential development (AB 3107 - Bloom); and streamlining housing approvals (AB 1279 - Bloom).

Preservation, Protection and Homelessness Legislation

The paramount importance of the shelter-at-home order to the state's COVID-19 response has underscored the significance of access to housing to California's overall wellbeing. For California's 3.4 million low-income renters—many of whom are bearing the brunt of the pandemic's impacts—the COVID-19 public health crisis has also exacerbated housing instability. Tenant protections—including proposals for COVID-19 emergency-related eviction and foreclosure moratoriums and homelessness have continued to be legislative priorities this year, though state funding for such programs has been limited given a more constrained budget

environment. At the time this memo was finalized AB 1436 (Chiu)—which extends the prohibition on evictions—is slated for a hearing in the Senate Judiciary Committee.

Regional Housing Needs Allocation – Resiliency Considerations

Of particular relevance to ABAG, SB 182 (Jackson) remains active. The bill would add a sixth objective to the regional housing needs allocation (RHNA) methodology related to promoting resilient communities and would require that ABAG—starting with the *current* RHNA cycle—consider wildfire risk as a factor in developing the RHNA methodology. The bill would require that ABAG (and other councils of government) minimize potential development in “very high fire risk areas,” including through taking into account the percentage of a jurisdiction’s land considered suitable for development that is in a “very high fire risk” area. The bill would additionally expand local governments’ fire hazard planning responsibilities and prohibit local governments from approving developments that aren’t adequately protected from fire hazards.

REGIONAL HOUSING NEEDS ALLOCATION



State Housing Bills – Status Update, 7/27/20

Bill Number	Topic	Summary	Status
PROTECTION & PRESERVATION			
AB 828 (Ting)	Tenant & homeowner protections	Eviction and foreclosure moratorium during COVID-19 emergency; extends until 15 days after state of emergency terminated	Senate Judiciary
AB 1436 (Chiu)	Tenant & homeowner protections	Eviction and foreclosure moratorium during COVID-19 emergency; extends through April 1, 2021 or 90 days after the termination of the state of emergency, whichever is earlier	Senate Judiciary
AB 2690 (Low)	Tenant protections	Repeals exemption from rent stabilization or rent control applicable to mobilehome units rented after January 1, 1990	Senate Judiciary
AB 3088 (Chiu)	Tenant protections	Clean-up to just-cause protection enacted last year	Senate Judiciary
PRODUCTION			
AB 725 (Wicks)	Missing middle housing	Requires that at least 25 percent of each metropolitan jurisdiction's share of moderate-income and above moderate-income regional housing need be allocated to sites zoned to allow at least four units of housing and, for moderate income RHNA sites, not more than 100 units per acre.	Senate Housing
AB 953 (Ting)	Accessory dwelling units (ADUs)	Deems a completed ADU or junior ADU (JADU) application approved if, within 60 days of having received a completed ADU or JADU application, the local government has not acted on the application	Senate Gov & Finance
AB 1279 (Bloom)	Streamlining multifamily housing development	Provides for by-right approval of certain multifamily housing developments in "high opportunity areas," as designated by the department of Housing and Community Development. Housing projects must meet minimum affordability, density, and site requirements.	Senate Housing
AB 1851 (Wicks)	Religious institution-affiliated housing developments	Prohibits a local agency from requirement replacement parking for religious institution-affiliated housing projects; Caps at 50% the number of parking spaces a developer can request to eliminate for an eligible project	Senate Gov & Finance
AB 2345 (Gonzalez)	Density bonus expansion	Amends density bonus law to allow developers to receive a maximum of six concessions—up from four—per project, revises affordability requirements, and decreases maximum allowable parking ratios a locality may require for certain developments receiving density bonuses, among other provisions.	Senate Housing

Bill Number	Topic	Summary	Status
AB 3040 (Chiu)	Missing middle housing	Creates certainty that local governments choosing to densify sites with existing single family homes will receive RHNA credit for the upzoning in housing element site inventories; for every single family site upzoned (or planned to be upzoned) to allow four units by-right, HCD would be required to provide a minimum credit of 0.1 units toward accommodating a local government’s moderate-income or above moderate-income housing need, subject to certain conditions. Retains HCD discretion to provide additional credits.	Senate Housing
AB 3107 (Bloom)	Housing development in underutilized commercial corridors	Authorizes housing as an “allowable use” on certain commercially-zoned land (infill sites not adjacent to industrial uses) if the housing development reserves at least 20% of the units to be affordable for low-income households, among other conditions. Provides that local governments are only subject to these provisions until 6 th cycle Housing Element rezonings are completed.	Senate Housing
SB 182 (Jackson)	Reducing development in high fire risk areas	Revises regional housing needs allocation (RHNA) requirements to 1) add a sixth RHNA objective related to promoting resilient communities and 2) require consideration of wildfire risk as a factor in developing the RHNA methodology; expands local government fire hazard planning responsibilities.	Senate Housing (consideration of Assembly amendments)
SB 899 (Wiener)	Affordable housing development	Provides that 100% affordable housing projects meeting certain height, density, site, and prevailing wage conditions are a use by-right—regardless of existing local zoning—on land owned by religious institutions or nonprofit colleges.	Assembly Housing and Community Development
SB 902 (Wiener)*	CEQA streamlining (zoning)	Authorize local governments, at their discretion, to pass a CEQA-exempt ordinance to upzone sites near transit and jobs—as defined by the bill—to allow for up to 10 units per parcel.	Assembly Local Government
SB 995 (Atkins)	CEQA streamlining (housing projects-judicial review)	Extends until 2025 and expands existing authorization for CEQA judicial review streamlining to include a new affordable housing category for housing projects that dedicate at least 15 percent of the units to lower-income households, that satisfy specified labor requirements (including that the project be constructed with a skilled and trained workforce) and are consistent with a region’s sustainable communities strategy.	Assembly Natural Resources

Bill Number	Topic	Summary	Status
SB 1085 (Skinner)	Missing middle housing (density bonus)	Creates a new density bonus category for moderate income rental housing: projects with 20 percent of the proposed units reserved for moderate income households would receive a 35 percent density bonus. Revises qualifications for Density Bonus Law incentives and concessions.	Assembly Housing and Community Development
SB 1120 (Atkins)	Missing middle housing	Encourages small-scale neighborhood development by streamlining the process (i.e. requires ministerial approval) of building a duplex or subdivide an existing lot in all residential areas. Projects would be need to conform to local zoning and design standards, historic districts, environmental quality and tenant protection requirements. Short term rentals would not be eligible for ministerial approval.	Assembly Local Government
SB 1385 (Caballero)	Housing development in underutilized commercial corridors	Allows residential development in areas zoned for retail commercial or office use; requires housing developments allowed under the bill meet or exceed densities deemed appropriate to accommodate low income housing (ranges from 10 to 30 units/acre, depending on the jurisdiction) and compliance with local zoning (including parking, design ordinances, etc.) and approval processes for housing projects in a zone with the applicable density. Prohibits short term rentals of units created pursuant to the bill.	Assembly Local Government
HOMELESSNESS			
AB 2405 (Burke)	Right to housing	Establishes that it is the policy of the state that all individuals in California have a right to housing (with a focus on Housing First homelessness prevention), effective January 1, 2026 and requires that state and local agencies consider the policy when implementing programs and policies related to homelessness prevention and affordable housing.	Senate Housing
AB 3269 (Chiu)	Statewide homelessness plan	Requires that the state Homelessness Coordinating and Financing Council conduct a statewide homelessness needs and gaps analysis, subject to funding availability and/or technical assistance availability from the U.S. Department of Housing and Urban Development. The bill also requires HCD to work with local governments to develop homelessness reduction benchmark goals and requires that local governments submit to HCD no later than January 1, 2022 a county-level plan for meeting specified benchmarks.	Senate Housing

*Note: Bills listed in **bold** are part of the Senate Leadership’s housing package



ABAG

Metropolitan Transportation Commission

375 Beale Street, Suite 800
San Francisco, CA 94105

Legislation Details (With Text)

File #: 20-1146 **Version:** 1 **Name:**

Type: Minutes **Status:** Committee Approval

File created: 7/16/2020 **In control:** ABAG Housing Methodology Committee

On agenda: 8/13/2020 **Final action:**

Title: Approval of ABAG Housing Methodology Committee Minutes of July 9, 2020

Sponsors:

Indexes:

Code sections:

Attachments: [Item 4a Minutes 20200709 Draft.pdf](#)

Date	Ver.	Action By	Action	Result
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Approval of ABAG Housing Methodology Committee Minutes of July 9, 2020

Clerk of the Board

Approval



Bay Area Metro Center
375 Beale Street
Suite 700
San Francisco, California

Meeting Minutes - Draft

ABAG Housing Methodology Committee

Chair, Jesse Arreguin, Mayor, City of Berkeley

Thursday, July 9, 2020

2:00 PM

Remote

Association of Bay Area Governments Housing Methodology Committee

The ABAG Housing Methodology Committee may act on any item on the agenda.

The meeting is scheduled to begin at 2:00 p.m.

Agenda and roster available at <https://abag.ca.gov>

For information, contact Clerk of the Board at (415) 820-7913.

Roster

Josh Abrams, Susan Adams, Anita Addison, Jesse Arreguin, Rupinder Bolaria, Rick Bonilla, Michael Brilliot, Monica Brown, Amanda Brown-Stevens, Paul Campos, Ellen Clark, Diane Dillon, Forrest Ebbs, Pat Eklund, Jonathan Fearn, Victoria Fierce, Neysa Fligor, Mindy Gentry, Russell Hancock, Welton Jordan, Brandon Kline, Jeffrey Levin, Scott Littlehale, Tawny Macedo, Fernando Marti, Rodney Nickens, Jr., James Pappas, Julie Pierce, Bob Planthold, Darin Ranelletti, Matt Regan, Jane Riley, Carlos Romero, Elise Semonian, Aarti Shrivastava, Vin Smith, Matt Walsh

1. Call to Order / Roll Call / Confirm Quorum

Chair Arreguin called the meeting to order at about 2:04 p.m. Quorum was present.

Present: 29 - Abrams, Addison, Arreguin, Bonilla, Brilliot, Brown, Brown-Stevens, Campos, Clark, Dillon, Eklund, Fearn, Fierce, Fligor, Gentry, Jordan, Levin, Macedo, Marti, Nickens, Pappas, Pierce, Planthold, Ranelletti, Riley, Romero, Semonian, Shrivastava, and Walsh

Absent: 8 - Adams, Bolaria-Shifrin, Ebbs, Hancock, Kline, Littlehale, Regan, and Smith

2. Public Comment

The following gave public comment: Steven Buss; Kyle Kelley.

The following submitted public comment: Tom Dubois, Eric Filseth, Lydia Kou; Suzanne Keehn; Hunter Oatman-Stanford; Charlie Stigler; Julia Berg; Brian Bills; Rachael Byrne; Cupertino for All; Dan Kempay; David Maltzan; Chris Peacock.

3. Chair's Report

- 3.a. [20-0988](#) ABAG Housing Methodology Committee Chair's Report of July 9, 2020
Chair Arreguin gave the report.

4. Consent Calendar

Upon the motion by Bonilla and second by Fierce, the Consent Calendar was approved. The motion passed unanimously by the following vote:

- Aye:** 27 - Abrams, Addison, Arreguin, Bonilla, Brilliot, Brown, Brown-Stevens, Campos, Clark, Dillon, Eklund, Fierce, Fligor, Gentry, Jordan, Levin, Macedo, Marti, Nickens, Pappas, Pierce, Ranelletti, Riley, Romero, Semonian, Shrivastava, and Walsh
- Absent:** 10 - Adams, Bolaria-Shifrin, Ebbs, Fearn, Hancock, Kline, Littlehale, Planthold, Regan, and Smith

- 4.a. [20-0989](#) Approval of ABAG Housing Methodology Committee Minutes of June 19, 2020

5. Plan Bay Area 2050

- 5.a. [20-0985](#) Plan Bay Area 2050 Draft Blueprint: Key Findings

Presentation on the findings from the Draft Blueprint analysis, highlighting successes and shortcomings in advance of stakeholder workshops later this month.

Dave Vautin gave the report.

The following gave public comment: Noah Housh; Alfred Twu.

6. RHNA Methodology Concepts

- 6.a. [20-0987](#) Plan Bay Area 2050 and RHNA Methodology

Consideration of Incorporating Plan Bay Area 2050 Draft Blueprint in the RHNA Methodology

Gillian Adams gave the report.

The following gave public comment: Aaron Eckhouse; Shajuti Hossain; Auros Harman; Robert Fruchtmann; Steven Buss; Ira Kaplan; Sonja Trauss; Sara Olgivie; Darrell Owens; Marcus Helmer; Lucia Sanchez; Jordan Grimes.

The following submitted public comment: William Goodwin.

6.b. [20-0986](#) RHNA Income Allocation

Further Discussion of the Regional Housing Needs Allocation (RHNA)
Income Allocation Methodology

Eli Kaplan gave the report.

The following gave public comment: Aaron Eckhouse; Steven Buss; Noah Housh; Robert Fruchtman; Anna Driscoll; Sidharth Kapur; Sam Deutsch; Kyle Kelley.

7. Adjournment / Next Meeting

Chair Arreguin adjourned the meeting at about 5:20 p.m. The next special meeting of the ABAG Housing Methodology Committee is on August 13, 2020.



ABAG

Metropolitan Transportation Commission

375 Beale Street, Suite 800
San Francisco, CA 94105

Legislation Details (With Text)

File #: 20-1147 **Version:** 1 **Name:**

Type: Report **Status:** Informational

File created: 7/16/2020 **In control:** ABAG Housing Methodology Committee

On agenda: 8/13/2020 **Final action:**

Title: Refining RHNA Methodology Concepts

Presentation of analysis to answer the HMC’s questions about the RHNA methodology’s potential baseline allocation, income allocation approach, and factors/weights. The HMC will discuss their preferences and possible recommendations for methodology components.

Sponsors:

Indexes:

Code sections:

- Attachments:**
- [Item 5a 1 Summary Sheet Methodology Concepts.pdf](#)
 - [Item 5a 2 Attachment A - RHNA Methodology Concepts.pdf](#)
 - [Item 5a 2 Appendix 1 - Baseline Share Maps.pdf](#)
 - [Item 5a 2 Appendix 2 - Total Allocations.pdf](#)
 - [Item 5a 2 Appendix 3 - Maps Methodology Concepts.pdf](#)
 - [Item 5a 2 Appendix 4 - Income Allocations.pdf](#)
 - [Item 5a 2 Appendix 5 - Allocation Results Table.pdf](#)
 - [Item 5a 2 Appendix 6 - Performance Evaluation.pdf](#)
 - [Item 5a Public Comment Combined.pdf](#)

Date	Ver.	Action By	Action	Result
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Refining RHNA Methodology Concepts

Presentation of analysis to answer the HMC’s questions about the RHNA methodology's potential baseline allocation, income allocation approach, and factors/weights. The HMC will discuss their preferences and possible recommendations for methodology components.

Gillian Adams

Information

Association of Bay Area Governments

Housing Methodology Committee

August 13, 2020

Agenda Item 5.a.

RHNA Methodology Concepts

Subject: Refining RHNA Methodology Concepts

Background: The Housing Methodology Committee’s (HMC) objective is to recommend to the Executive Board an allocation methodology for dividing up the Bay Area’s Regional Housing Need Determination among the region’s jurisdictions. This Regional Housing Needs Allocation (RHNA) 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.

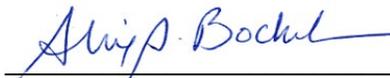
At the July HMC meeting, the committee considered the role that the Plan Bay Area 2050 Blueprint could play in the RHNA methodology; the committee also continued discussions about potential methodology approaches for allocating units by income category. The August HMC meeting will continue the discussion on the baseline approach and the income allocation, with the cross-cutting lens of achieving consistency with Plan Bay Area 2050. The meeting will focus on some of the key decisions the HMC will need to make to finalize the recommended structure of the RHNA methodology:

- Which **baseline** should the methodology use?
- Should we **incorporate Plan Bay Area 2050** in the methodology, and if so, how?
- What **income allocation approach** should the methodology use?

Issues: None

Recommended Action: Information

Attachment: A. RHNA Methodology Concepts

Reviewed: 
Alix Bockelman

REGIONAL HOUSING NEEDS ALLOCATION



TO: ABAG Housing Methodology Committee
FR: Deputy Executive Director, Policy
RE: Refining RHNA Methodology Concepts

DATE: August 13, 2020

Overview

The Housing Methodology Committee's (HMC) objective is to recommend to the Executive Board an allocation methodology for dividing up the Bay Area's Regional Housing Need Determination among the region's jurisdictions. This Regional Housing Needs Allocation (RHNA) 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.

At the July HMC meeting, the committee considered the role that the Plan Bay Area 2050 Blueprint could play in the RHNA methodology and continued discussions about potential methodology approaches for allocating units by income category. While the HMC started its discussion about using the Blueprint in the methodology, there was insufficient time for the committee to reach any conclusions about whether or not to incorporate Plan Bay Area 2050.

The August HMC meeting will continue the discussion about the Blueprint and how it could be included in the methodology. The meeting will focus on some of the key decisions the HMC will need to make to finalize the structure of the RHNA methodology:

- Which **baseline allocation** should the methodology use?
- Should we **incorporate Plan Bay Area 2050** in the methodology, and if so, how?
- What **income allocation approach** should the methodology use?

This memo provides information in response to several ideas raised at the July HMC meeting to support the committee's decisions on these topics.

Once the HMC has made decisions about these foundational pieces of the methodology, committee members will have the opportunity (either at the August meeting or at future meetings) to discuss the **factors and weights** that best complement the underlying structure of the methodology. As part of that future discussion, staff will be seeking a decision from the HMC on the idea of grouping moderate-income units with affordable units, if the Bottom-Up income allocation approach is selected at today's meeting (more details about this idea are on page 11). Staff also proposes to seek confirmation about the **performance evaluation metrics** at the subsequent HMC meeting on August 28.

Continuing the Conversation About Using Plan Bay Area 2050 in the RHNA Methodology

A critical decision the HMC needs to make in developing the RHNA methodology is whether or not to include Plan Bay Area 2050. At the July HMC meeting, staff presented two ideas for how the Blueprint could be used in the RHNA methodology: 1) using the Blueprint as the sole input for allocating units based on each jurisdiction's share of household growth between 2015 and 2050 and 2) using the household growth distribution as the baseline allocation.

During the HMC's discussions about the Plan Bay Area 2050 Draft Blueprint in July, some committee members expressed interest in using the Draft Blueprint in the RHNA methodology, but there were also some concerns about the Draft Blueprint's heavy emphasis on growth in the South Bay. For this reason, there did not appear to be support for using the Draft Blueprint as the sole factor for allocating RHNA units, although some HMC members expressed interest in using the Draft Blueprint as a potential baseline allocation if it could be paired with factors that help to more evenly distribute RHNA units throughout the region.

ABAG/MTC staff appreciates the complexity of the HMC's decision about whether to use the Blueprint in the RHNA methodology. As noted at the July meeting, the strategies and policies included in the Draft Blueprint achieve a number of positive housing- and equity-related outcomes for the Bay Area, including reducing housing cost burden, especially for lower-income households; improving the region's jobs-housing balance; and directing substantial growth to high-resource areas. These results are consistent with the priorities the HMC identified in June, particularly that "more housing should go to jurisdictions with more jobs than housing and to communities exhibiting racial and economic exclusion."

At the same time, there are critical differences between the process and outcomes for RHNA compared to those for Plan Bay Area 2050. While both efforts must meet multiple objectives, by statute, each has a different emphasis on the outcomes that are prioritized. For RHNA, the top priority is achieving an equitable distribution of housing units which, with the recent changes to Housing Element Law, specifically emphasizes overcoming patterns of segregation and fostering inclusive communities that provide universal access to opportunity to affirmatively further fair housing. While directing more growth to high resource areas to affirmatively further fair housing is a major component of the Blueprint, the growth framework focuses on high resource areas with basic or high-quality transit services, striking a balance between greenhouse gas emissions reduction and equity goals. As a result, the methodology options using the Draft Blueprint presented in July did not allocate housing growth to all high resource areas in the region in a consistent manner.

Accelerating Plan Bay Area 2050's Equity Outcomes Through RHNA

In an attempt to balance the different perspectives from HMC members about using the Blueprint in the methodology, staff is presenting several new methodology options that include the Plan Bay Area 2050 Blueprint but also temper the forecasted development pattern to ensure

the methodology affirmatively furthers fair housing in all communities. This approach is also consistent with feedback provided at the July 16 meeting of the ABAG Executive Board, where several Board members expressed support for incorporating the Plan Bay Area 2050 Blueprint into the RHNA methodology.

Using Plan Bay Area 2050 in the RHNA methodology would communicate to our local government partners and other stakeholders that we are moving toward a unified vision for the Bay Area's future. Having the Blueprint as an input into the RHNA methodology can provide a bridge between the development pattern that exists today and what is envisioned for 2050. Yet the long-term growth vision of the Plan can also be moderated during the short-term period of RHNA to ensure that critical regional equity goals are achieved swiftly. To some extent, this is a matter of sequencing—using the Blueprint in the RHNA methodology *in a tempered way* will enable the region to accelerate toward a more equitable and less segregated land use pattern in the near-term while building toward the broader range of positive outcomes from the Blueprint in the long-term.

The nature of the RHNA process is particularly well-suited to balancing a long-range regional vision with an accelerated pathway toward equity outcomes in the near-to-medium term. In contrast to Plan Bay Area 2050, which offers incentives to prompt local government land use changes to implement its vision for future, Housing Element Law compels local governments to take action to implement policies, strategies, and zoning changes to accommodate their RHNA allocations. RHNA allocations will establish a pattern of housing growth in the near term (2023 to 2031) that will anchor the foundation for how Bay Area jurisdictions move forward on implementing the vision in Plan Bay Area 2050.

Another benefit of using the Plan in some fashion is that the Blueprint uses the UrbanSim model to analyze a wide variety of land use and economic information. These analyses can support ABAG in demonstrating how the methodology addresses the 12 factors outlined in Housing Element Law as well as other topics of regional significance, such as avoiding growth in areas with high risk of natural hazards. Lastly, while staff's initial analyses show that using the Plan is not required to achieve consistency, using the Blueprint would increase the extent to which RHNA is consistent with the Plan.

Staff recognizes that some members of the HMC have concerns about integrating the Plan Bay Area 2050 Blueprint, including the fact that the Final Blueprint is slated for release in December 2020 after the HMC has completed its work. However, staff believes that the upsides associated with Blueprint integration are greater than any potential downsides.

New Options for Using Plan Bay Area 2050 in the RHNA Methodology

For these reasons, staff is proposing two new ideas that include the Plan Bay Area 2050 Blueprint but also emphasize allocations to high resource areas and distributing RHNA units more evenly throughout the region:

1. **New baseline allocation option: Future Year 2050 Households from the Draft Blueprint.** Instead of using household growth from the Draft Blueprint as a baseline allocation, this option uses a jurisdiction's total number of forecasted households for year 2050. In effect, this baseline allocation takes into consideration a jurisdiction's existing total number of households (similar to Households 2019) plus its household growth from the Draft Blueprint, creating a blended solution to the baseline question.
2. **New methodology concepts: Balanced Blueprint/High Resource Areas.** These concepts include a new allocation factor, Future Housing Growth, which uses household growth from the Draft Blueprint.¹ In these concepts, the Future Housing Growth factor is paired with the Access to High Opportunity Areas factor, specifically designed to accelerate near-term progress on equity. One methodology uses the Income Shift approach, while the other uses the Bottom-Up approach. Both concepts are paired with the 2019 households baseline allocation. **Table 2** on page 9 provides the specific factors and weights that comprise these two methodology concepts.

The 2050 Households (Blueprint) baseline allocation will be discussed along with other potential baseline options in the next section. The Balanced Blueprint/High Resource Areas concept is included in staff's analyses of the allocations that would result from different combinations of methodology concepts and baseline allocation options. While neither option would guarantee consistency, integration of the Blueprint in some form will certainly reduce the risks of inconsistencies between Plan Bay Area 2050 and RHNA.

Building the RHNA Methodology: Baseline Allocation Options

As noted earlier, one of the foundational decisions the HMC will have to make to define the RHNA methodology is what baseline allocation to use. In the RHNA methodologies under consideration, the baseline allocation is used to assign each jurisdiction a beginning share of the Regional Housing Needs Determination (RHND). The chosen factors and weights are then used to adjust a jurisdiction's baseline allocation up or down, depending on how a jurisdiction scores on a factor compared to other jurisdictions in the region. By design, the factors are placed on the same scale such that 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 can be assigned to a jurisdiction with a high score.

¹ This new allocation factor is also available within the [RHNA online visualization tool](#), where it is labeled as "Future Housing Growth (Draft Blueprint)."

Potential Baseline Allocation Options

Figure 1 includes maps that show each jurisdiction's share of the regional total for the following baseline allocation options:²

- Households 2019: The methodology options presented prior to the July meeting all used a jurisdiction's share of total households in 2019 as the baseline allocation.
- Future Housing Growth 2015-2050 (Draft Blueprint): A jurisdiction's share of Bay Area household growth through 2050, consistent with the growth pattern in the Plan Bay Area 2050 Draft Blueprint (as discussed in July). This approach is consistent with how long-range forecasts have been used in ABAG's methodologies for previous RHNA cycles.
- Future Year 2050 Households (Draft Blueprint): A jurisdiction's share of Bay Area households in 2050, consistent with the future household distribution in the Plan Bay Area 2050 Draft Blueprint. As noted above, this is a new option being introduced for the August HMC meeting as a potential option for using the Plan in the RHNA methodology as a baseline allocation. This baseline takes into consideration a jurisdiction's existing households plus its household growth from the Draft Blueprint.
- Existing Jobs: At the June HMC meeting, committee members came to consensus around several recommendations to guide selection of the RHNA methodology. These recommendations included directing more housing to jurisdictions with more jobs than housing and focusing on the relationship between housing and jobs. In July, several HMC members reiterated the importance of linking housing to jobs. In response, staff developed the existing jobs baseline, which would divide the RHNA among local jurisdictions based on each jurisdiction's share of the region's total jobs. This calculation uses LEHD data from the Census Bureau, which was most recently updated in 2017.³
- Urbanized Land Area: At the July HMC meeting, several members proposed using a jurisdiction's land area as the baseline allocation, as this would prevent the effects of a jurisdiction's past land use decisions from impacting the RHNA methodology's outcomes. Staff calculated land area by using the Census Bureau's definition of urbanized land and excluding lands protected from development under federal or state programs. This approach uses publicly available data sources⁴ and is consistent with Housing Element Law in that it excludes state and federally protected lands from the calculation of a jurisdiction's land area, but it does not exclude locally-designated parks or protected lands since these may qualify as local land use restrictions.⁵

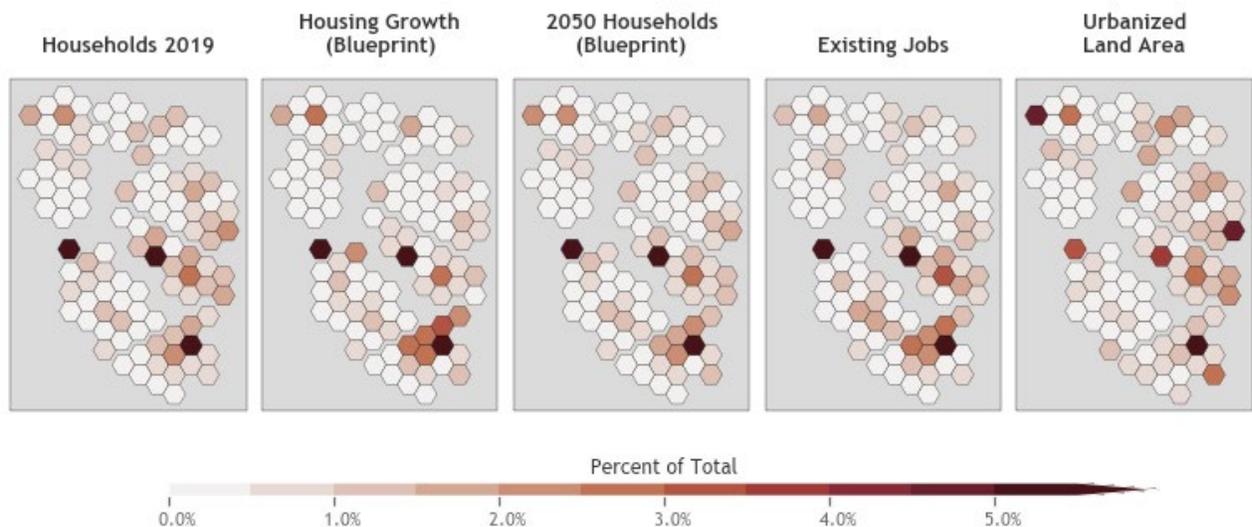
² All baseline options listed here are now available within the [RHNA online visualization tool](#).

³ Data from U.S. Census Bureau, Longitudinal Employer-Household Dynamics, Workplace Area Characteristics file, with jobs from 2015-2017 averaged at the city level.

⁴ Data on urbanized lands is from the [Census Bureau](#) and data on state and federal open spaces are from [California Protected Areas Database \(CPAD\)](#), from the GreenInfo Network. Areas controlled by local cities directly were excluded.

⁵ [Government Code Section 65584.04\(e\)](#) describes factors the RHNA methodology must consider as well as factors ABAG cannot include in the RHNA methodology. Notably, the statute states that ABAG "may not limit its

Figure 1: Jurisdiction Share of Regional Total for Baseline Allocation Options



The results displayed in Figure 1 are independent of any methodology option and focus on the underlying pattern for each baseline. Detailed versions of the maps in Figure 1 that label each jurisdiction and show its share of the regional total are included in **Appendix 1**. Observations on this decision point include:

- San Jose, San Francisco, and Oakland exhibit high shares of the regional totals in all of the options except Urbanized Land Area (where only San Jose has a particularly high share of the region’s total).
- For Households 2019, in addition to the three big cities, many communities throughout the Bay Area show higher shares of total households, particularly in the East Bay and Santa Rosa.
- The Housing Growth (Blueprint) baseline and Existing Jobs baseline exhibit a similar emphasis on jurisdictions in the South Bay, although the Existing Jobs baseline also shows jurisdictions with higher shares of the total in the East Bay, along the Peninsula, and in Santa Rosa.
- The 2050 Households (Blueprint) baseline shows the highest shares of the regional total in the three big cities with more moderate shares in South Bay jurisdictions, and with a more even distribution throughout the region, similar to Households 2019.
- The Urbanized Land Area baseline emphasizes San Jose, several unincorporated areas, Fremont, Santa Rosa, and Fairfield and jurisdictions on the outer edges of the region.

Table 1 summarizes some of the pros and cons of each of the five baseline allocation options.

consideration of suitable housing sites or land suitable for urban development to existing zoning ordinances and land use restrictions of a locality.” The statute also notes that the RHNA methodology needs to consider “[l]ands preserved or protected from urban development under existing *federal or state programs*.” [Emphasis added].

Table 1: Pros and Cons of Baseline Allocation Options

	Pros	Cons
Households 2019	<ul style="list-style-type: none"> • More even distribution of RHNA throughout region • Few issues with achieving consistency with Plan Bay Area (with current weights/factors) • Not dependent on Final Blueprint slated for approval this fall 	<ul style="list-style-type: none"> • Directs more RHNA to jurisdictions that have historically built housing • If HMC wants RHNA methodology to emphasize topics currently addressed in the Plan (e.g., hazards, transit, market feasibility, etc.) they may need to be added as allocation factors
Future Year 2050 Households (Draft Blueprint)	<ul style="list-style-type: none"> • Considers both existing households as well as expected future growth • Integrates transit, hazards, and market feasibility through strategies and modeling • Better aligned with Plan Bay Area 2050 than 2019 households 	<ul style="list-style-type: none"> • Blueprint will continue to evolve in summer & fall based upon Plan public engagement
Future Housing Growth 2015-2050 (Draft Blueprint)	<ul style="list-style-type: none"> • Integrates transit, hazards, and market feasibility through strategies and modeling • Best aligned with Plan Bay Area 2050 • Emphasis on employment patterns leads to RHNA allocations more focused in Silicon Valley, region’s largest job center • Higher RHNA allocations in high-resource areas near major job centers – notably in South Bay 	<ul style="list-style-type: none"> • Lower RHNA allocations for some high-resource areas with more limited transit services • Blueprint will continue to evolve in summer & fall via Plan public engagement
Urbanized Land Area	<ul style="list-style-type: none"> • Growth more evenly spread throughout region • Past land use decisions do not affect RHNA allocations • Not dependent on Final Blueprint slated for approval this fall 	<ul style="list-style-type: none"> • Works against focused growth: three big cities have smallest shares of regional totals and unincorporated areas have highest shares of regional totals in this baseline • Significant concerns for achieving consistency with Plan Bay Area 2050 (<i>see page 12 for more on the evaluating consistency</i>). • If HMC wants RHNA methodology to emphasize topics currently addressed in the Plan, they may need to be added as allocation factors
Existing Jobs	<ul style="list-style-type: none"> • Rationale of promoting more housing near jobs is easily understandable • Not dependent on Final Blueprint slated for approval this fall 	<ul style="list-style-type: none"> • Relative to Households 2019, directs smaller shares of RHNA units to exclusive residential communities • Some issues would need to be addressed to achieve consistency with Plan Bay Area 2050 • If HMC wants RHNA methodology to emphasize topics currently addressed in the Plan, they may need to be added as allocation factors

As the Households 2019 and 2050 Households (Blueprint) baselines appear to be most successful at achieving both statutory objectives and regional planning goals, the analyses that follow focus solely on methodology options paired with these two baselines. However, all five baseline options are now incorporated in the [RHNA online visualization tool](#), so HMC members and the public can explore how Existing Jobs, Urbanized Land Area, and all other baseline options pair with different methodologies.

Staff chose to continue to include the Households 2019 baseline for analyses since the HMC is familiar with this option and expressed support for it in past meetings. 2050 Households (Blueprint) provides a middle ground between using Households 2019 and Housing Growth (Blueprint), since this option considers both existing households as well as expected future growth. Some HMC members expressed hesitation over using Housing Growth (Blueprint) as the baseline due its concentrated growth in the South Bay. However, the 2050 Households (Blueprint) baseline provides a more even growth distribution while still aligning directly with Plan Bay Area 2050 and reflecting how transit, hazards, and market feasibility are incorporated in the Plan. Accordingly, staff felt that the HMC might prefer 2050 Households (Blueprint) over Housing Growth (Blueprint) as a way to incorporate Plan Bay Area 2050 in the RHNA methodology baseline.

Staff decided not to incorporate the Existing Jobs or Urbanized Land Area baselines when analyzing methodology options for the August HMC meeting. The Existing Jobs baseline is similar in its distribution to the baselines from the Draft Blueprint. In addition, staff's analyses of methodology options using the Existing Jobs baseline indicated they did not perform well on the performance metrics related to affirmatively furthering fair housing, and did not distribute growth in ways that align with the equity-centered goals shared by both the HMC and the statutes governing the RHNA process.

The Urbanized Land Area baseline resulted in a very dispersed growth pattern, with housing directed away from the region's three big cities of San Jose, San Francisco, and Oakland and significant allocations to unincorporated areas. This baseline failed to direct housing toward jurisdictions with access to jobs and transit, and it produced results counter to the sustainability-centered emphasis shared by both state law and the HMC. As a result of this dispersed growth pattern, there were significant issues related to achieving consistency with Plan Bay Area 2050 (see page 12 for more information about the approach for evaluating consistency).

The charts in **Appendix 2** show each jurisdiction's initial allocation for all five baseline options and compare the impact of the Households 2019 and 2050 Households (Blueprint) baseline

allocation options on the total units allocated to a jurisdiction under six different methodology scenarios:⁶

- *Option 1A: Bottom-Up - 3-Factor Concept*
- *Option 1B: Bottom-Up - 3-Factor Concept with Adjusted Income Groupings (see page 11 for details)*
- *Option 2A: Bottom-Up - Balanced Blueprint/High Resource Areas*
- *Option 2B: Bottom-Up - Balanced Blueprint/High Resource Areas with Adjusted Income Groupings*
- *Option 3: Income Shift 125% - Housing/Jobs Crescent*
- *Option 4: Income Shift 125% - Balanced Blueprint/High Resource Areas*

Below, **Table 2** displays the factors and weights that make up the six methodology concepts mentioned above.

Table 2: Factors and Weights in Six Potential Methodology Concepts

<p>1. Bottom-Up - 3-Factor Concept <i>Very Low and Low</i></p> <ul style="list-style-type: none"> • 40% - Access to High Opportunity Areas • 40% - Jobs-Housing Fit • 20% - Job Proximity – Transit <p><i>Moderate and Above Moderate</i></p> <ul style="list-style-type: none"> • 50% - Job Proximity – Auto • 30% - Job Proximity – Transit • 20% - Jobs-Housing Balance 	<p>2. Bottom-Up - 3-Factor Concept with Adjusted Income Groupings <i>Very Low, Low, and Moderate</i></p> <ul style="list-style-type: none"> • 40% - Access to High Opportunity Areas • 40% - Jobs-Housing Fit • 20% - Job Proximity – Transit <p><i>Above Moderate</i></p> <ul style="list-style-type: none"> • 50% - Job Proximity – Auto • 30% - Job Proximity – Transit • 20% - Jobs-Housing Balance
<p>3. Bottom-Up - Balanced Blueprint/High Resource Areas <i>Very Low and Low</i></p> <ul style="list-style-type: none"> • 70% - Access to High Opportunity Areas • 30% - Future Housing Growth <p><i>Moderate and Above Moderate</i></p> <ul style="list-style-type: none"> • 70% - Future Housing Growth • 30% - Access to High Opportunity Areas 	<p>4. Bottom-Up - Balanced Blueprint/High Resource Areas with Adjusted Income Groupings <i>Very Low, Low, and Moderate</i></p> <ul style="list-style-type: none"> • 40% - Access to High Opportunity Areas • 40% - Future Housing Growth <p><i>Above Moderate</i></p> <ul style="list-style-type: none"> • 40% - Access to High Opportunity Areas • 40% - Future Housing Growth
<p>5. Income Shift 125% - Housing/Jobs Crescent</p> <ul style="list-style-type: none"> • 50% - Access to High Opportunity Areas • 10% - Jobs Proximity – Transit • 10% - Jobs-Housing Balance • 10% - Jobs-Housing Fit • 10% - Transit 	<p>6. Income Shift 125% - Balanced Blueprint/High Resource Areas</p> <ul style="list-style-type: none"> • 50% - Access to High Opportunity Areas • 50% - Future Housing Growth

⁶ For simplicity, staff is only showing only one of the Income Shift methodologies and one of the Bottom-Up concepts. The other methodology options that the HMC has discussed previously are still under consideration.

In addition to the primary content in **Appendix 2** discussed above, more detailed content is provided in:

- **Appendix 3** includes maps comparing the RHNA allocations for these six methodology concepts using the Households 2019 and 2050 Households (Blueprint) baseline allocations.
- **Appendix 4** shows the allocation results by income for every jurisdiction.
- **Appendix 5** is a table that shows the allocations for each jurisdiction for each of these methodology concepts.

Building the RHNA Methodology: Income Allocation Approach

The second step in building the foundation of the RHNA methodology is selecting an approach for allocating units by income. The two methodology concepts for the income allocation that the HMC has been discussing to date are the *Income Shift* and the *Bottom-Up* concept:

- **Income Shift.** In this approach, the total number of units allocated to a jurisdiction is identified first, and the income allocation methodology is used to distribute that total among the four income categories.⁷ In the Income Shift approach, a jurisdiction's distribution of households by income is compared to the distribution for the region. The Income Shift moves the local income distributions closer to or beyond the regional distribution, depending on the income shift multiplier. A jurisdiction that has a higher percentage of existing households in a given income category compared to the region receives a smaller share of units in that income category, and vice versa.
- **Bottom-Up.** In contrast to the Income Shift, the Bottom-Up income allocation approach does not start with a total allocation assigned with a factor-based methodology. Instead, this approach uses factors to determine allocations for the four income categories, and the sum of these income group allocations represents a jurisdiction's total allocation.

Table 3 shows the pros and cons for the income allocation approaches.

⁷ State law defines the following RHNA income categories:

- Very Low Income: households earning less than 50 percent of Area Median Income (AMI)
- Low Income: households earning 50 - 80 percent of AMI
- Moderate Income: households earning 80 - 120 percent of AMI
- Above Moderate Income: households earning 120 percent or more of AMI

Table 3: Summary of Pros and Cons for Income Allocation Approaches

Approach	Pros	Cons
Income Shift	<ul style="list-style-type: none"> • Allows narrative focus to be on total allocation factors • Directly related to statutory objective • Multiplier can be adjusted to complement underlying total allocation methodology 	<ul style="list-style-type: none"> • Cannot finetune income allocations with factors • Mechanical adjustment to income categories introduces concerns about over-allocating market-rate units to jurisdictions with higher shares of lower-income households
Bottom-Up	<ul style="list-style-type: none"> • Allows more fine-grained control over allocations for a particular income category • Could enable a stronger narrative for how methodology divides allocation by income • More directly supports statutory fair housing goals by enabling lower-income units to be directed specifically toward areas of opportunity 	<ul style="list-style-type: none"> • Could be more complex, depending on number of factors used • Assigning units by income category first results in less direct control over total unit allocations

Regrouping Income Categories for Bottom-Up Concepts

The HMC did not come to any resolution about which income allocation approach to pursue at its meeting in July. However, in the HMC’s discussions to date, it appears that members are leaning in favor of the Bottom-Up approach. The discussion in July prompted one proposed change to how the Bottom-Up approach groups the different RHNA income categories. The Bottom-Up methodologies proposed by staff use two factor-based calculations: one set of factors determine the allocation of very low- and low-income units, while another set of factors determines the allocation for moderate- and above moderate-income units.

Part of staff’s rationale for this grouping was that very low- and low-income units are often co-located in affordable housing developments funded by government subsidy. On the other hand, the main government subsidy programs that produce affordable housing cannot be used for moderate-income units. Thus, moderate-income units are likely to be located within market-rate projects subject to inclusionary housing ordinances, or moderate-income units may be produced by the market in some of the inland communities at the region’s periphery. Consequently, staff proposed that the Bottom-Up approach could use the same factors for very low- and low-income units and the same factors for moderate- and above moderate-income units.

Several HMC members suggested changing the grouping for the Bottom Up approach so moderate-income units would be allocated using the same factors as very low- and low-income units while a separate calculation would be used only for above moderate-income units. HMC members noted that the market in the Bay Area largely does not produce moderate-income

units, so it would be more sensible to group these units with lower-income units, as the construction of all three types of units require some type of policy intervention.

HMC members also noted this regrouping would align better with the Streamlined Ministerial Approval Process⁸ established by Senate Bill 35 (2017)⁹ and modified by Assembly Bill 1485 (2019).¹⁰ HCD's [Updated Streamlined Ministerial Approval Process Guidelines](#) published in April 2020 note that if a Bay Area jurisdiction has not made sufficient progress toward its above moderate-income RHNA, a housing development qualifies for streamlined approval if 10 percent of units are for households making 80 percent of Area Median Income (AMI) or below (very low- and low-income) or if 20 percent of units are for households making 120 percent AMI and below (moderate-income and below). Accordingly, isolating above moderate-income units and grouping very low-, low-, and moderate-income units together as suggested by several HMC members aligns with groupings already recognized in state law.

Staff concludes that either grouping for the Bottom-Up approach (the original grouping proposed by staff or the revisions suggested by some HMC members) has a justifiable policy rationale. Ultimately, it is up to the HMC to decide which grouping produces better outcomes for the region.

Overall, the regrouping has a minimal impact on the RHNA methodology's outcomes. Since a different set of factors now determines the allocation of moderate-income units, the only change is in the number of moderate-income units assigned to each jurisdiction. As moderate-income units are only 16 percent of the RHND, a jurisdiction's total allocation is unlikely to change substantially due to this regrouping. Generally speaking, the main impact is that suburban jurisdictions with more high-income residents see a slight increase in their moderate-income allocations and overall RHNA, while the larger cities and more economically diverse jurisdictions see a slight decrease in their moderate-income allocations and overall RHNA. Details about the allocations by income for every jurisdiction for the different methodology concepts are available in Appendices 4 and 5.

Consistency Between RHNA and Plan Bay Area 2050

At the July HMC meeting, some committee members noted the need for consistency between RHNA and Plan Bay Area 2050 as a consideration in deciding whether or not to use the Draft Blueprint in the methodology. Housing Element Law requires that RHNA "shall allocate housing units within the region consistent with the development pattern included in [Plan Bay Area 2050]."¹¹ The statute does not provide any additional guidance about how to evaluate consistency between RHNA and the Plan. At the July meeting, HMC members asked staff to follow up with staff from the California Department of Housing and Community Development

⁸ [Government Code Section 65913.4.](#)

⁹ More information on Senate Bill 35 is available [here](#).

¹⁰ More information on Assembly Bill 1485 is available [here](#).

¹¹ [Government Code Section 65584.04\(m\)\(1\).](#)

(HCD) for additional guidance about how to interpret this statutory requirement. ABAG/MTC staff consulted with HCD staff, and they confirmed that Housing Element Law does not task HCD with determining or making findings of consistency. Therefore, it is up to the COG to explain how the RHNA methodology is consistent with the Plan.

The approach that ABAG/MTC staff has identified for determining consistency is based on a comparison of RHNA allocations to the household growth pattern in Plan Bay Area 2050. Given that Plan Bay Area 2050 includes a growth pattern at the county level and at the subcounty level,¹² staff proposes to compare the 8-year RHNA housing growth and the 30-year Plan Bay Area 2050 housing growth to ensure that in no cases does the 8-year growth level exceed the 30-year growth level at either of these geographic levels. Since the RHNA allocations are at a jurisdictional level, they have been summed to enable comparison with Plan Bay Area 2050 growth projections. When this criterion is met for both county and subcounty geographic levels, RHNA and Plan Bay Area 2050 will be determined to be consistent.

Staff has tested the proposed approach for evaluating consistency on the set of six methodology options paired with the Households 2019 and 2050 Households (Blueprint) baseline allocations. These analyses indicate that there are no consistency issues for any of these proposed options as they are currently constructed. As the HMC continues to make refinements as it moves toward the proposed methodology, staff will evaluate the options for consistency and consider potential mitigations in the RHNA and/or Plan Bay Area 2050 processes if issue areas arise. Ultimately, the Final Blueprint (action slated in September 2020) and the Proposed Methodology (action slated in October 2020) will need to be consistent.

Performance Evaluation Results for Methodology Options

For the May HMC meeting, staff prepared a set of potential metrics for evaluating RHNA methodology options. These metrics intend to assist the HMC with assessing whether a proposed methodology will meet the statutory RHNA objectives and further regional planning goals. Staff based some of these metrics on the analysis conducted by HCD in evaluating the RHNA methodologies completed by other regions in California.¹³ Other metrics reflected input from stakeholders and staff's interpretation of statutory language. After receiving feedback from the HMC in May, staff revised the initial set of proposed metrics based on what appeared to be most relevant to HMC members. This revised set of metrics is currently incorporated in the RHNA online visualization tool. Additionally, staff's presentation at the July HMC meeting used these metrics to analyze the methodology options discussed in the materials for that meeting.

¹² There are 34 subcounty areas ("superdistricts") in the Bay Area; the geography was developed in the early 2000s to explore development patterns at a more localized scale. More information is available here:

<http://opendata.mtc.ca.gov/datasets/travel-model-super-districts?geometry=-124.477%2C37.698%2C-120.404%2C38.454>

¹³ For copies of letters HCD sent to other regions, see [this document](#) from the January 2020 HMC meeting agenda packet.

Similar to the analysis presented in July, **Appendix 6** shows the performance evaluation results for the following methodology concepts using the Households 2019 and 2050 Households (Blueprint) baseline allocation options:

- *Option 1A: Bottom-Up - 3-Factor Concept*
- *Option 1B: Bottom-Up - 3-Factor Concept with Adjusted Income Groupings*
- *Option 2A: Bottom-Up - Balanced Blueprint/High Resource Areas*
- *Option 2B: Bottom-Up - Balanced Blueprint/High Resource Areas with Adjusted Income Groupings*
- *Option 3: Income Shift 125% - Housing/Jobs Crescent*
- *Option 4: Income Shift 125% - Balanced Blueprint/High Resource Areas*

Since the July meeting, staff has changed one metric: *Measure 5b - Household Growth in High Divergence Score Areas with High-Income Households*. The measure compared, for each jurisdiction, its share of households in 2019 with its share of the RHNA allocation. If the jurisdiction's share of RHNA was at least as large as the jurisdiction's share of the region's households, the jurisdiction was counted as having a proportional allocation of RHNA. The metric then reported on the percentage of these "proportional" cities within the group of cities that was both relatively more segregated and relatively higher income compared to the region.

One downside of the metric we were previously using was that it did not take jurisdiction size into account. As a result, a proportional allocation to a number of small cities would get the same performance score as an allocation with the same number of larger cities seeing proportional growth, even if the latter would yield benefits to a much larger population. To better capture the impacted population, staff adjusted the measure to report on the ratio of RHNA share to household share for the group as a whole, instead of each city in the group individually. A value of 1 for the measure now means that the group of cities sees proportional growth relative to its starting household count.

Overall, all of the methodology options appear to achieve the statutory objectives when paired with either baseline. However, the methodologies using the Bottom-Up approach tend to perform the best on the evaluation metrics. The Bottom-Up 3-Factor methodology had the best performance on nearly every metric regardless of which baseline it was paired with, while the Bottom-Up Balanced Blueprint/High Resource Areas methodology (Households 2019 baseline) also performed strongly across the metrics. Below is a summary describing which methodology options appear to most effectively achieve each of the five statutory objectives:¹⁴

¹⁴ A list of the five statutory objectives is [available here](#).

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

- **Results:** All options appear to further this objective. Both Bottom-Up options, **Option 1A: Bottom-Up - 3-Factor** (with either baseline) and **Option 2A: Bottom-Up - Balanced Blueprint/High Resource Areas** seem to be the most effective for achieving this objective, as they result in the most expensive jurisdictions receiving nearly 50 percent of their allocations as lower-income units.

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

- **Results:** All options appear to further this objective, and they all perform fairly comparably. **Options using data from the Draft Blueprint, either using 2050 Households (Blueprint) as the baseline or the Future Housing Growth allocation factor,** seem to most successfully achieve this objective, as they result in the jurisdictions with the most access to jobs and transit having the highest growth rates while areas with less access to jobs and transit experience lower growth.

Objective 3 metric: *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?*

- **Results:** All options appear to further this objective. **Bottom-Up - 3-Factor** options (regardless of the baseline they are paired with) seem to be the most effective, as they result in jurisdictions with the most unbalanced jobs-housing fit receiving nearly 50 percent of their allocation as lower-income units.

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

- **Results:** All options appear to further this objective. Both Bottom-Up options, **Option 1A: Bottom-Up - 3-Factor** (with either baseline) and the **Option 2A: Bottom-Up - Balanced Blueprint/High Resource Areas**, seem to be the most effective, as they direct the highest share of lower-income RHNA to disproportionately high-income jurisdictions. These options also provide the most affordable housing for the jurisdictions with the most disproportionately large shares of low-income residents.

Objective 5 metrics: *Do jurisdictions with the largest percentage of households living in High or Highest Resource tracts receive a significant percentage of their RHNA as lower-income units? Do racially and economically exclusive jurisdictions receive allocations proportional to their share of the region's households?*

- **Results: Bottom-Up - 3-Factor** options (regardless of the baseline they are paired with) result in the highest shares of lower-income RHNA going to jurisdictions with the most access to opportunity. However, **Income Shift 125% - Housing/Jobs Crescent** options (regardless of the baseline they are paired with) are most effective at ensuring that jurisdictions exhibiting racial and economic exclusion receive allocations proportional to their share of the region's households, seeing the largest ratios of RHNA relative to existing household shares.

HMC Decision Points and Initial Staff Recommendations

This memo has provided information about several key topics to support the HMC in making decisions about the structure of the RHNA methodology. This section identifies the foundational decisions the HMC will need to make in order to advance the development of the RHNA methodology, as well as staff's initial recommendations on these questions. These decision points will be the primary topics for discussion at the August HMC meeting.



Decision Point #1: What baseline allocation does the HMC recommend for the RHNA methodology?

Once the HMC chooses a baseline allocation, the factors and weights selected for the methodology would be used to adjust a jurisdiction's starting allocation based on the baseline up or down depending on how the jurisdiction scored on the factor compared to other jurisdictions. Some of the key information HMC members can consider in deciding about what baseline they prefer includes:

- **Appendix 1** has maps of each jurisdiction's share of the regional total for each baseline.
- **Table 1** (page 7) summarizes some of the pros and cons of the baseline options.
- **Appendix 2** (charts) and **Appendix 3** (maps) show the impact of the baseline options on total units allocated to a jurisdiction for different methodology options.
- **Appendix 6** shows variations in the performance evaluation results for the methodology options using different baselines.

Initial Staff Recommendation: Use the **2050 Households (Blueprint) baseline** because it captures the benefits of using the Plan Bay Area 2050 Blueprint in the RHNA methodology. It provides a middle ground between using Households 2019 and Housing Growth (Blueprint), since this option considers both existing households as well as expected future growth.

DECISION

POINT

Decision Point #2: If 2050 Households (Blueprint) is not selected as the baseline, does the HMC recommend using the Blueprint as a factor in the methodology?

One option for using Plan Bay Area 2050 in the RHNA methodology would be to use it as a baseline allocation. A second option would be to use it as an allocation factor. HMC members can consider the following information in deciding about using the Blueprint as a factor:

- **Appendix 2** (charts) and **Appendix 3** (maps) show the impact of the baseline options on total units allocated to a jurisdiction for different methodology options. **Appendix 4** shows charts of the allocation results by income for every jurisdiction.
- **Appendix 5** shows the numbers used to generate these charts and maps.
- **Appendix 6** shows variations in the performance evaluation results for the methodology options using different baselines.

***Initial Staff Recommendation:** If the 2050 Households (Blueprint) baseline is not selected in Decision Point #1, **include the Future Housing Growth factor** from the Blueprint. This would help to capture the benefits of using the Plan Bay Area 2050 Blueprint in the RHNA methodology, while retaining an alternative baseline.*

DECISION

POINT

Decision Point #3: Does the HMC recommend the Income Shift or Bottom-Up approach?

The second defining feature of the structure of the RHNA methodology is choosing between the Income Shift and Bottom-Up concepts for the income allocation approach. HMC members can consider the following information in deciding about what baseline they prefer:

- **Table 3** (page 10) summarizes the pros and cons of the income allocation options.
 - **Appendix 4** shows charts of the allocation results by income for every jurisdiction.
 - **Appendix 5** shows the numbers used to generate these charts and maps.
- Appendix 6** shows variations in the performance evaluation results for the methodology options using different baselines.

***Initial Staff Recommendation:** Use the **Bottom-Up income allocation approach**, because it consistently performs the best on the evaluation metrics. It also allows greater flexibility to adjust the income allocations to direct more lower-income units to jurisdictions with a disproportionate share of higher-income households. Furthermore, it also directs fewer market-rate units to*

jurisdictions with a disproportionate share of lower-income households to reduce displacement pressures.

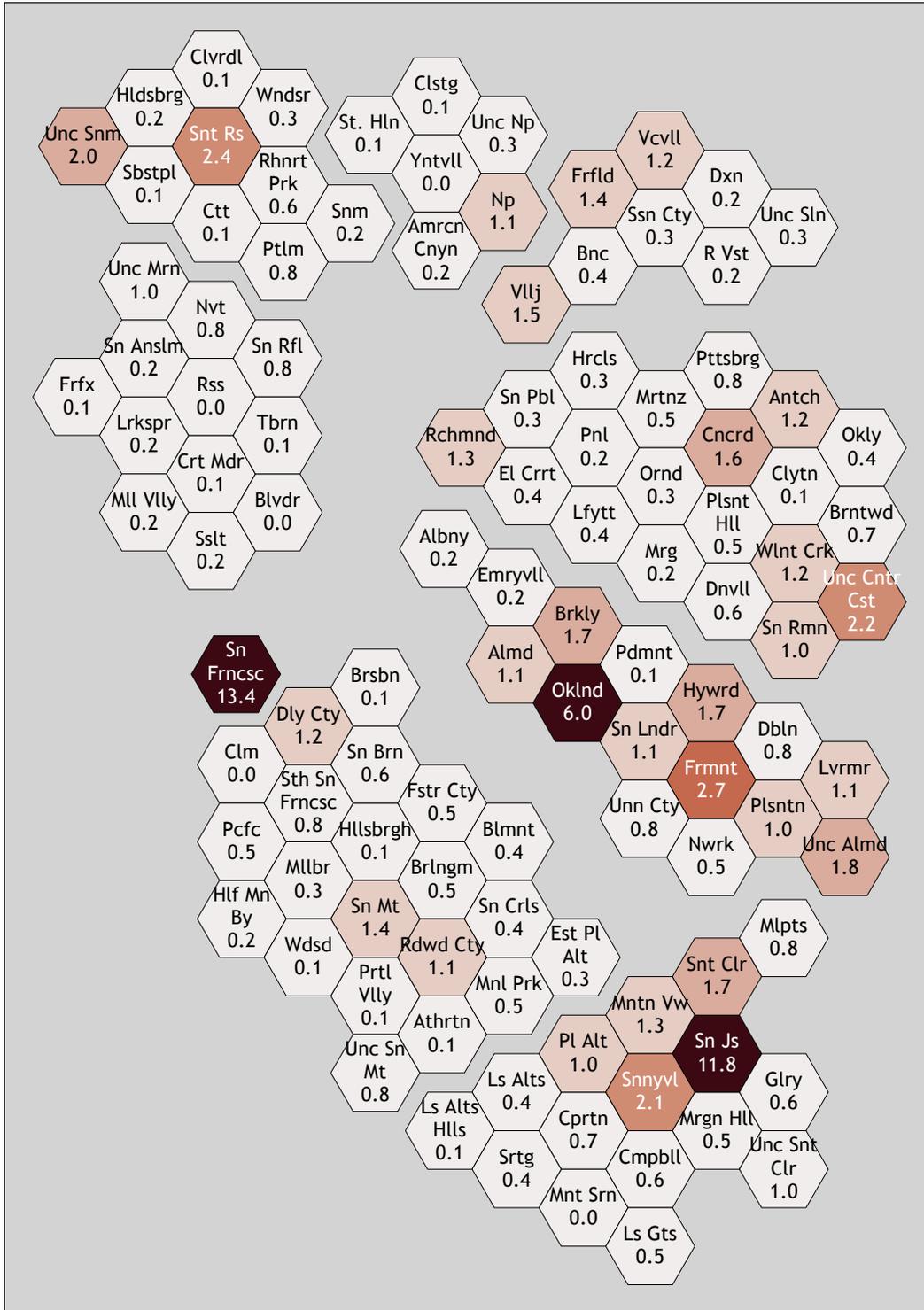
Next Steps

At the August 13 meeting, staff will seek recommendations from the HMC related to the three key decision points mentioned above. This will set the foundation for the RHNA methodology. After the HMC has reached consensus on setting the foundation for the RHNA methodology, future meetings, including the meeting added on August 28, will focus on making decisions about the specific factors to include in the methodology and how to weight them. Staff will also seek a decision about adjusting the income groupings for the Bottom-Up concepts if that income allocation approach is selected by the HMC. Staff also proposes to seek confirmation about the performance evaluation metrics. Staff encourages HMC members to explore the new options in the [RHNA online visualization tool](#) between meetings to help them prepare for making these decisions.

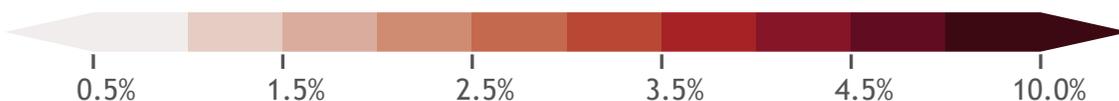
Appendix 1: Jurisdiction Share of Regional Totals for Different Baseline Options

Map shows the starting point for the RHNA allocation. Factors and weights are applied to a baseline, altering the share of the RHND assigned to each jurisdiction

Households 2019



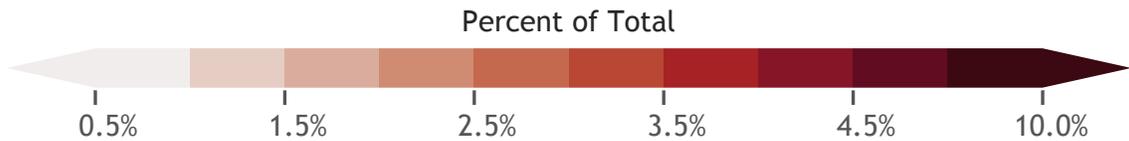
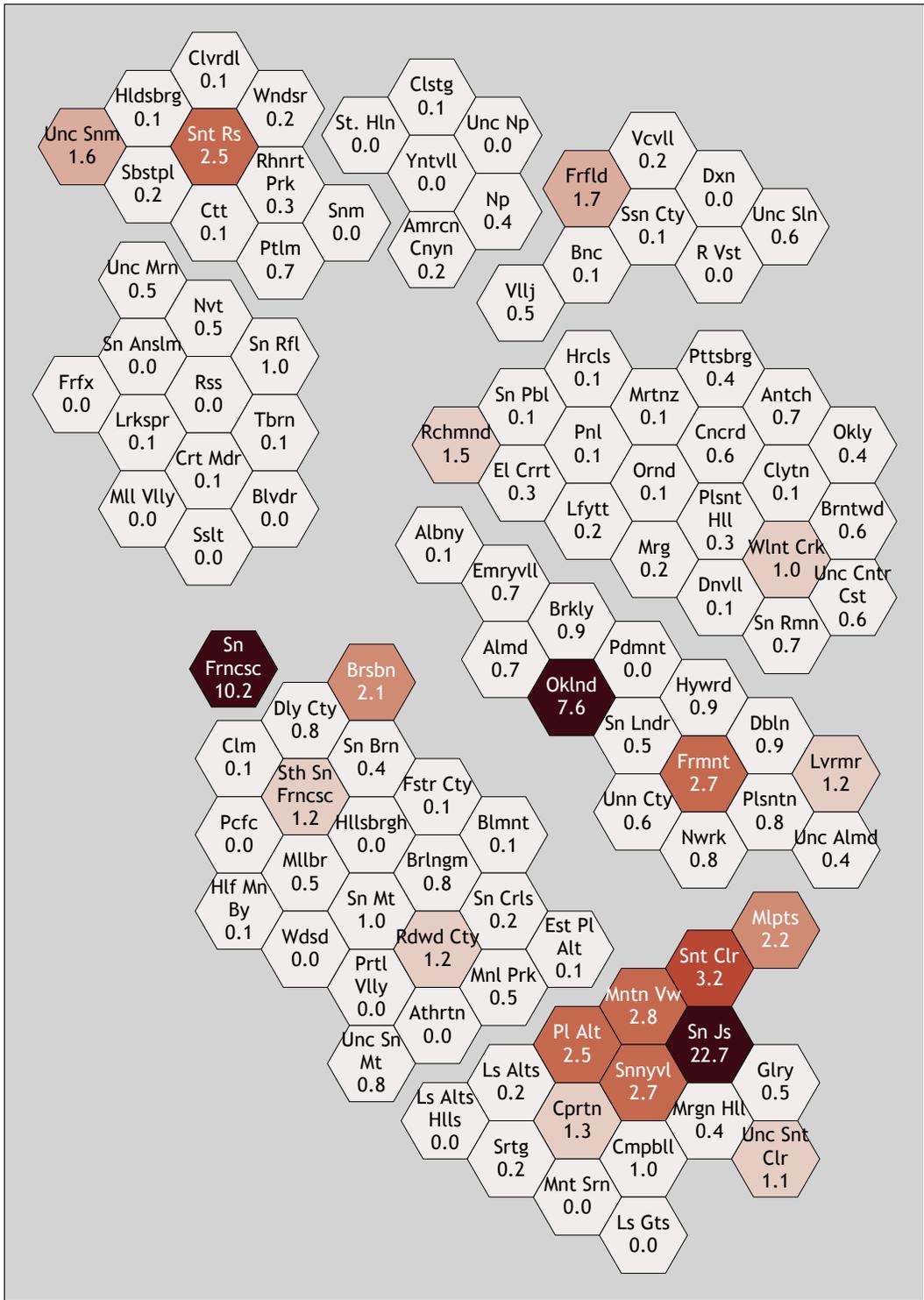
Percent of Total



Appendix 1: Jurisdiction Share of Regional Totals for Different Baseline Options

Map shows the starting point for the RHNA allocation. Factors and weights are applied to a baseline, altering the share of the RHND assigned to each jurisdiction

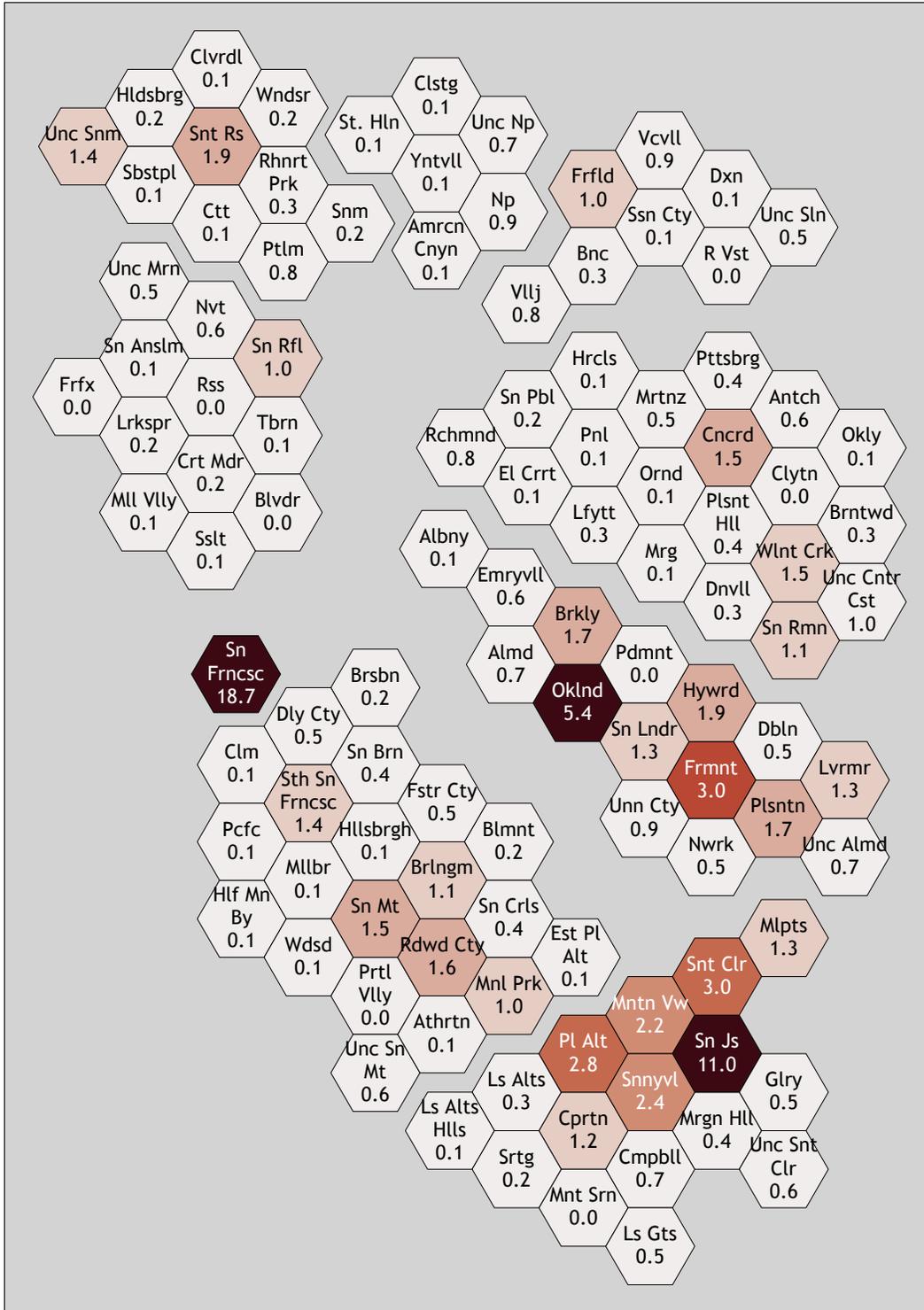
Housing Growth (Blueprint)



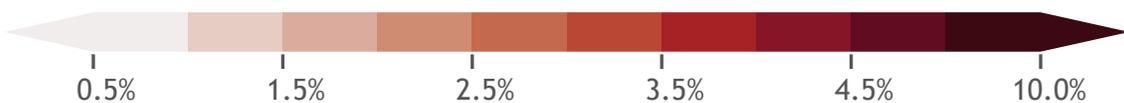
Appendix 1: Jurisdiction Share of Regional Totals for Different Baseline Options

Map shows the starting point for the RHNA allocation. Factors and weights are applied to a baseline, altering the share of the RHND assigned to each jurisdiction

Existing Jobs



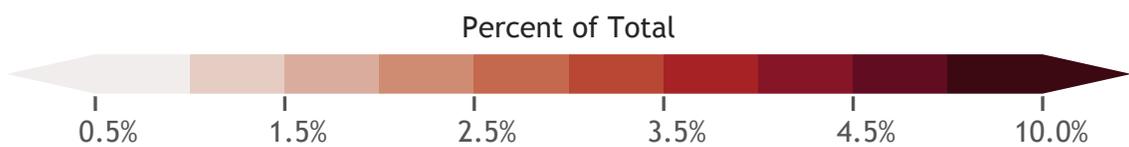
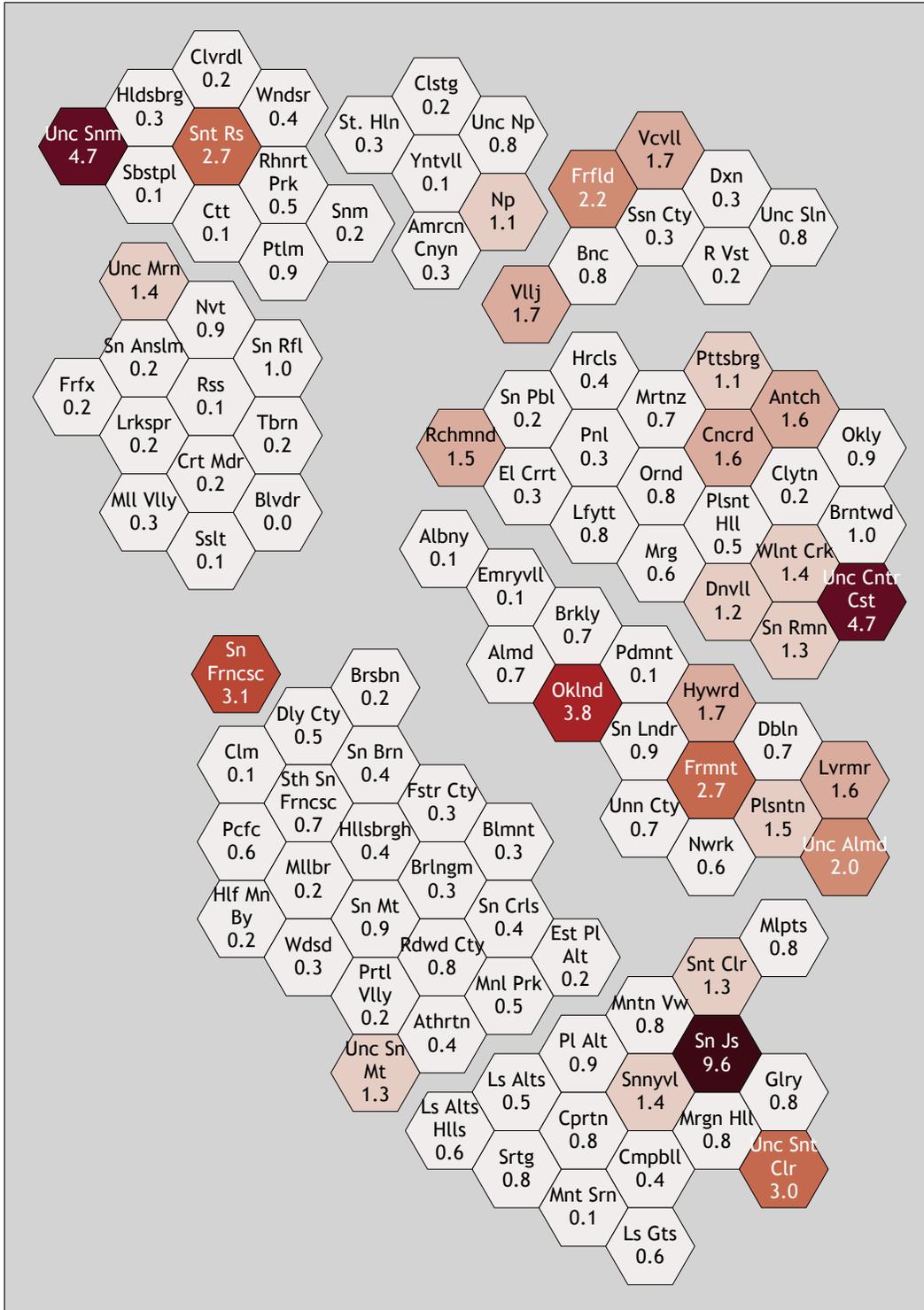
Percent of Total



Appendix 1: Jurisdiction Share of Regional Totals for Different Baseline Options

Map shows the starting point for the RHNA allocation. Factors and weights are applied to a baseline, altering the share of the RHND assigned to each jurisdiction

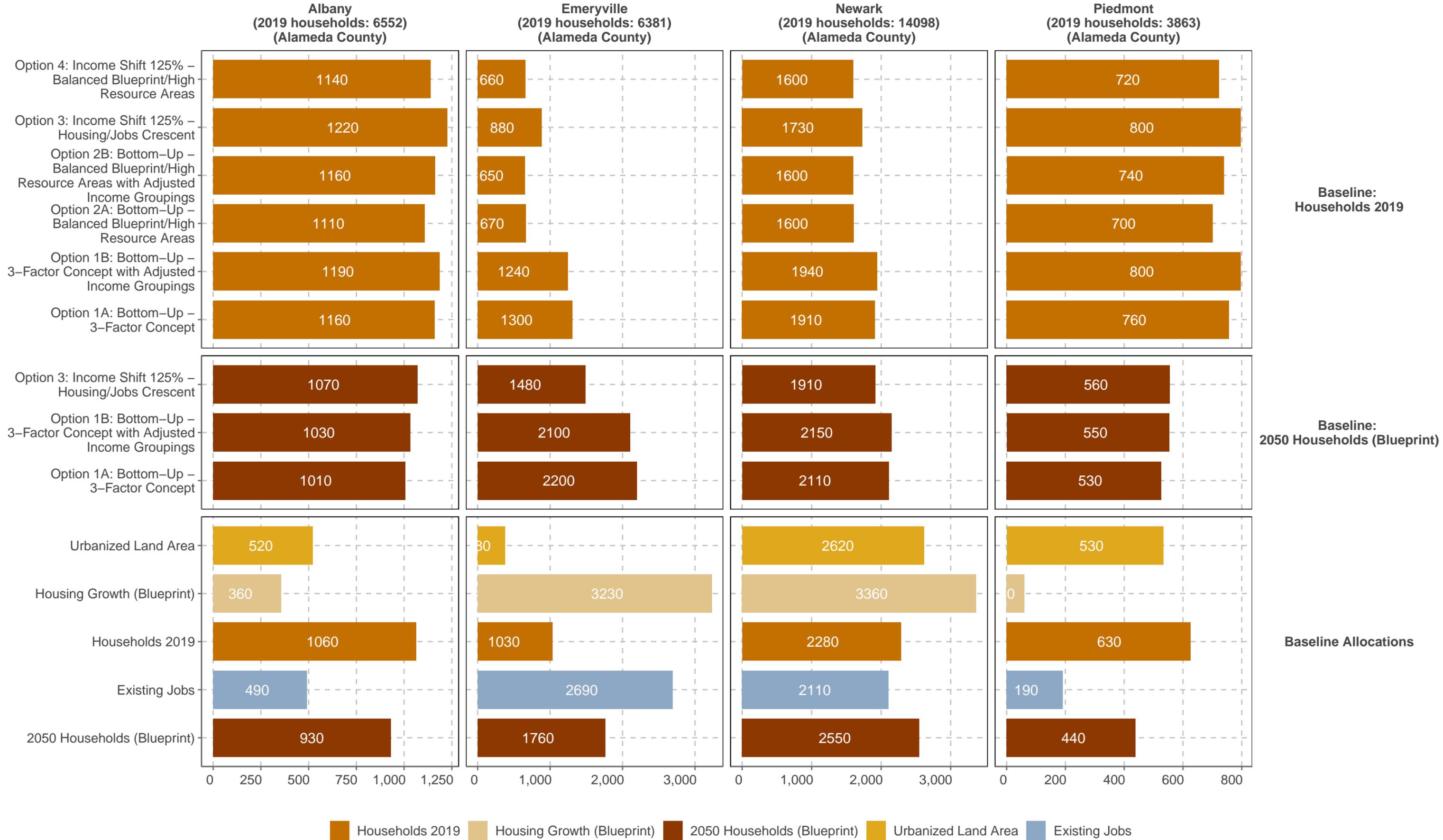
Urbanized Land Area



Appendix 2: Potential RHNA Allocation

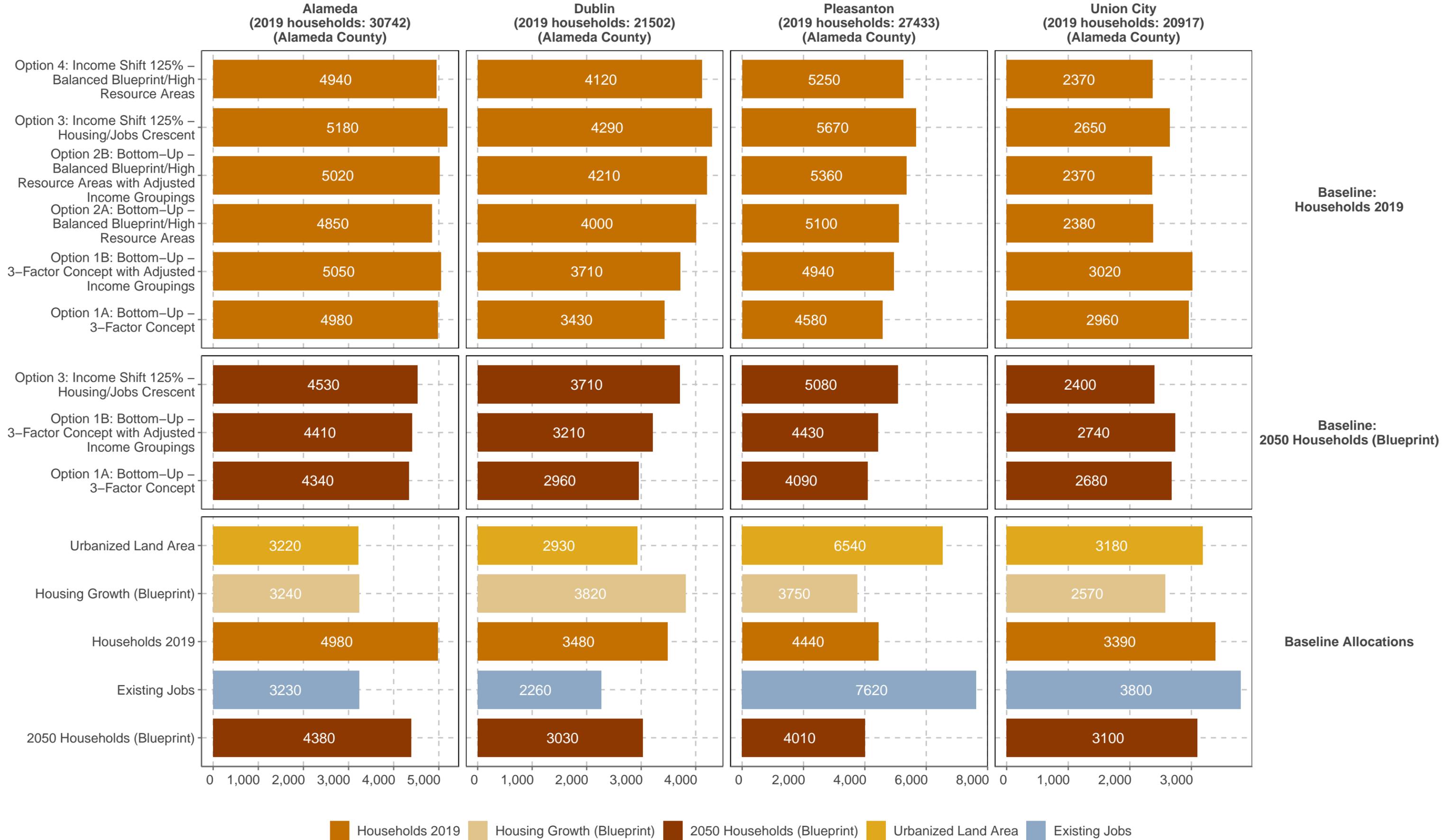
Page 01 (Counties on Page: Alameda)

Chart shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details.
 Label shows allocation rounded to nearest 10.



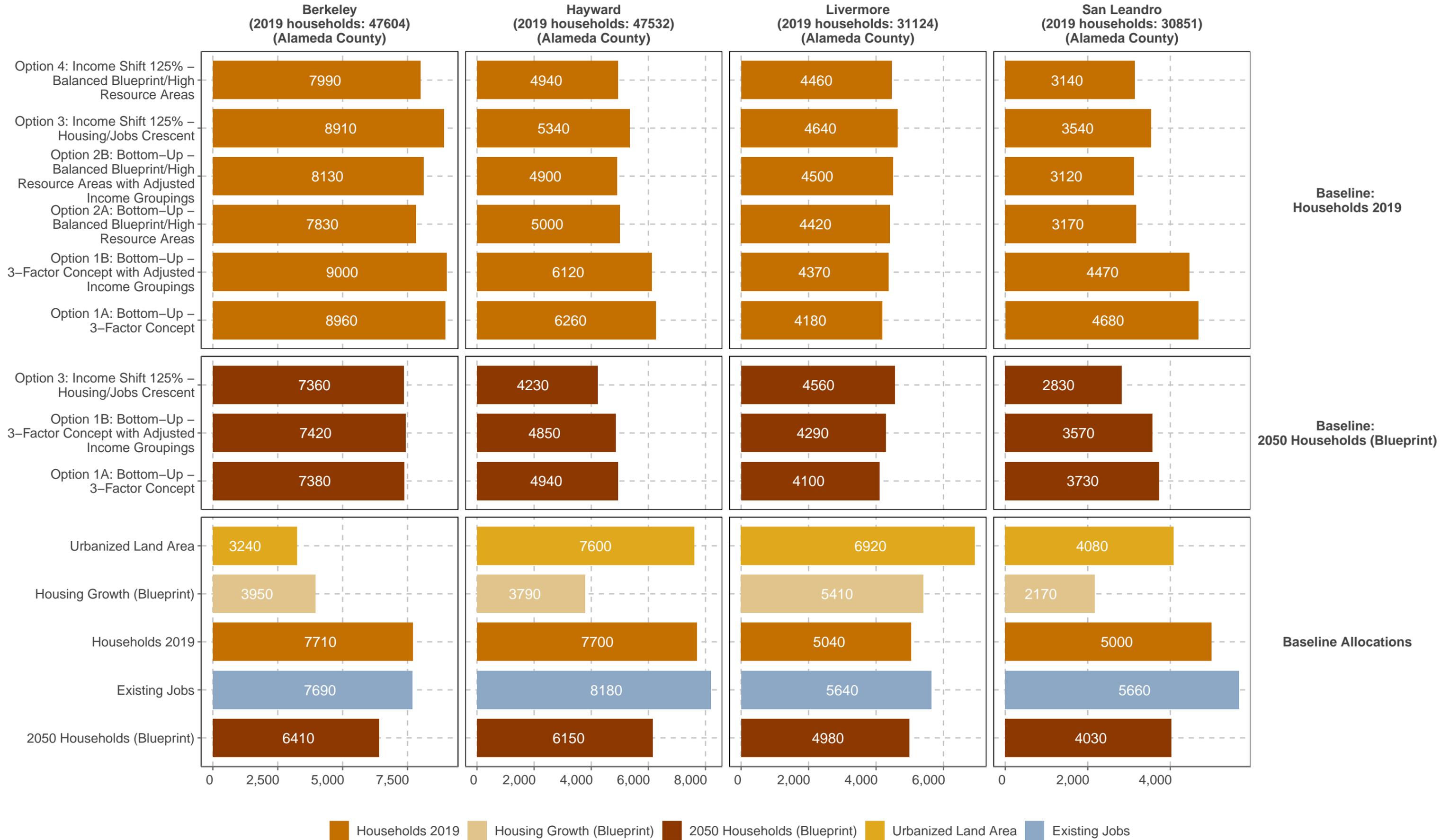
Appendix 2: Potential RHNA Allocation
Page 02 (Counties on Page: Alameda)

Chart shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details.
 Label shows allocation rounded to nearest 10.



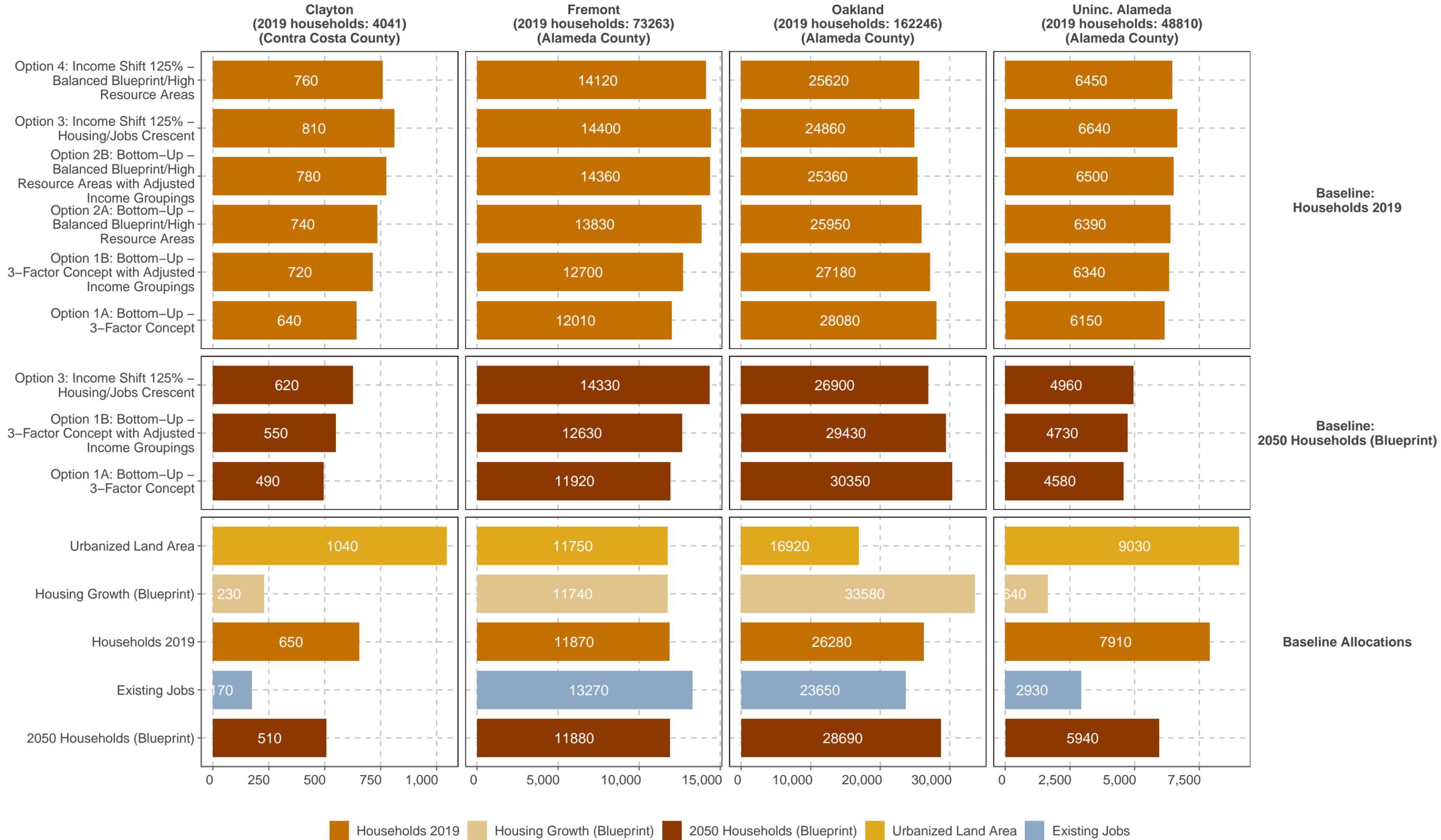
Appendix 2: Potential RHNA Allocation
Page 03 (Counties on Page: Alameda)

Chart shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details.
 Label shows allocation rounded to nearest 10.



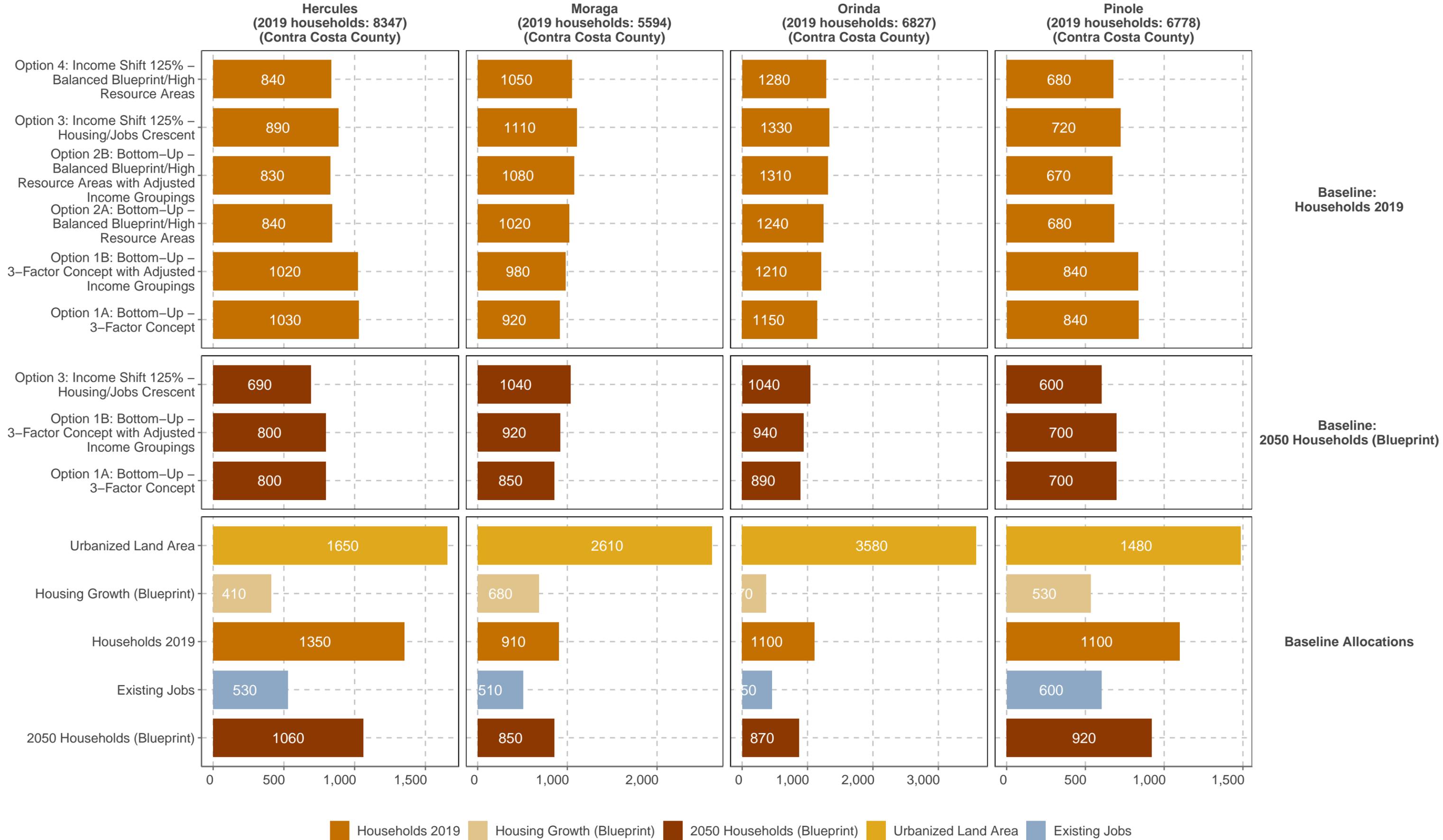
Appendix 2: Potential RHNA Allocation
Page 04 (Counties on Page: Contra Costa, Alameda)

Chart shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details.
 Label shows allocation rounded to nearest 10.



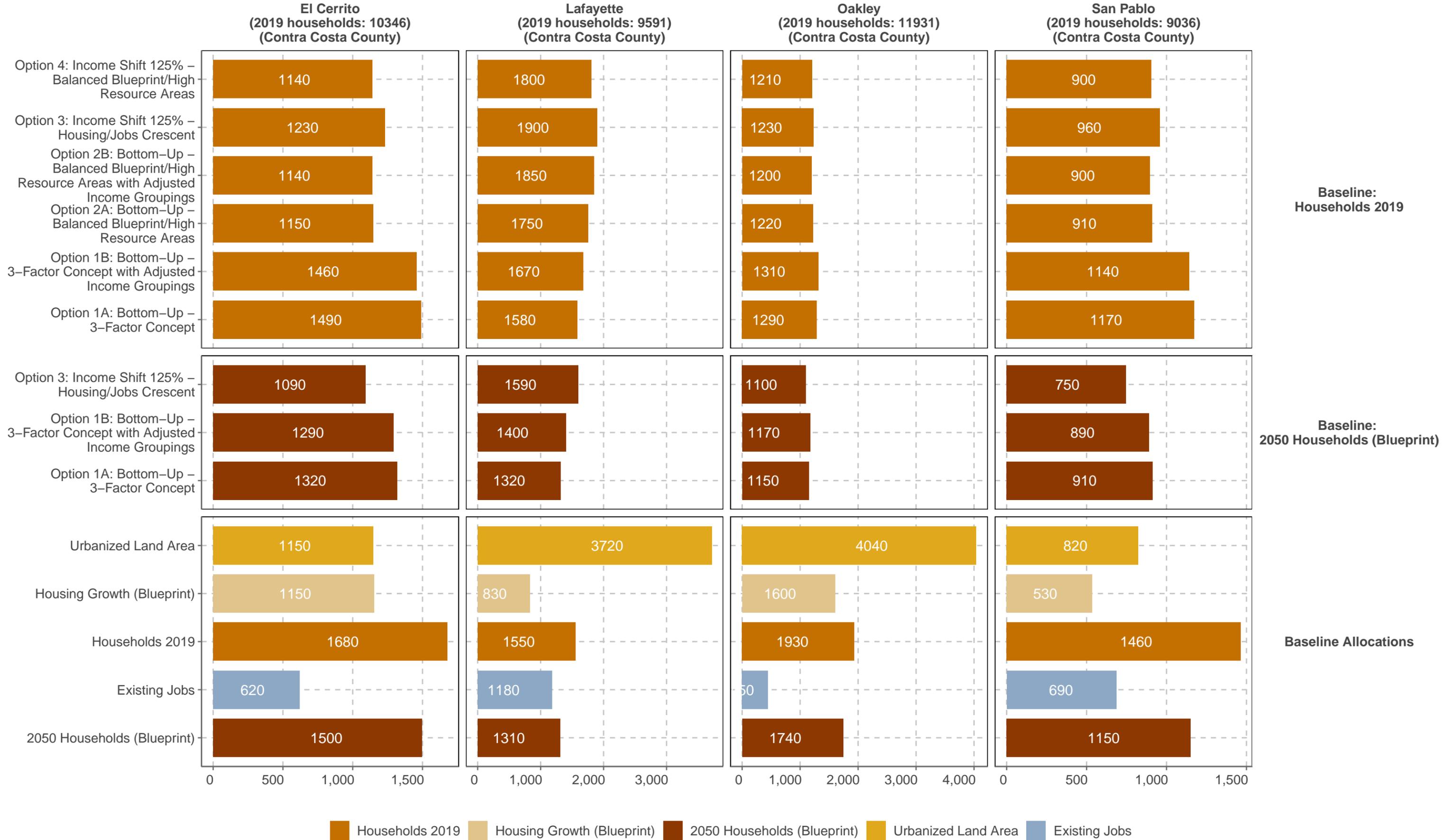
Appendix 2: Potential RHNA Allocation
Page 05 (Counties on Page: Contra Costa)

Chart shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details.
 Label shows allocation rounded to nearest 10.



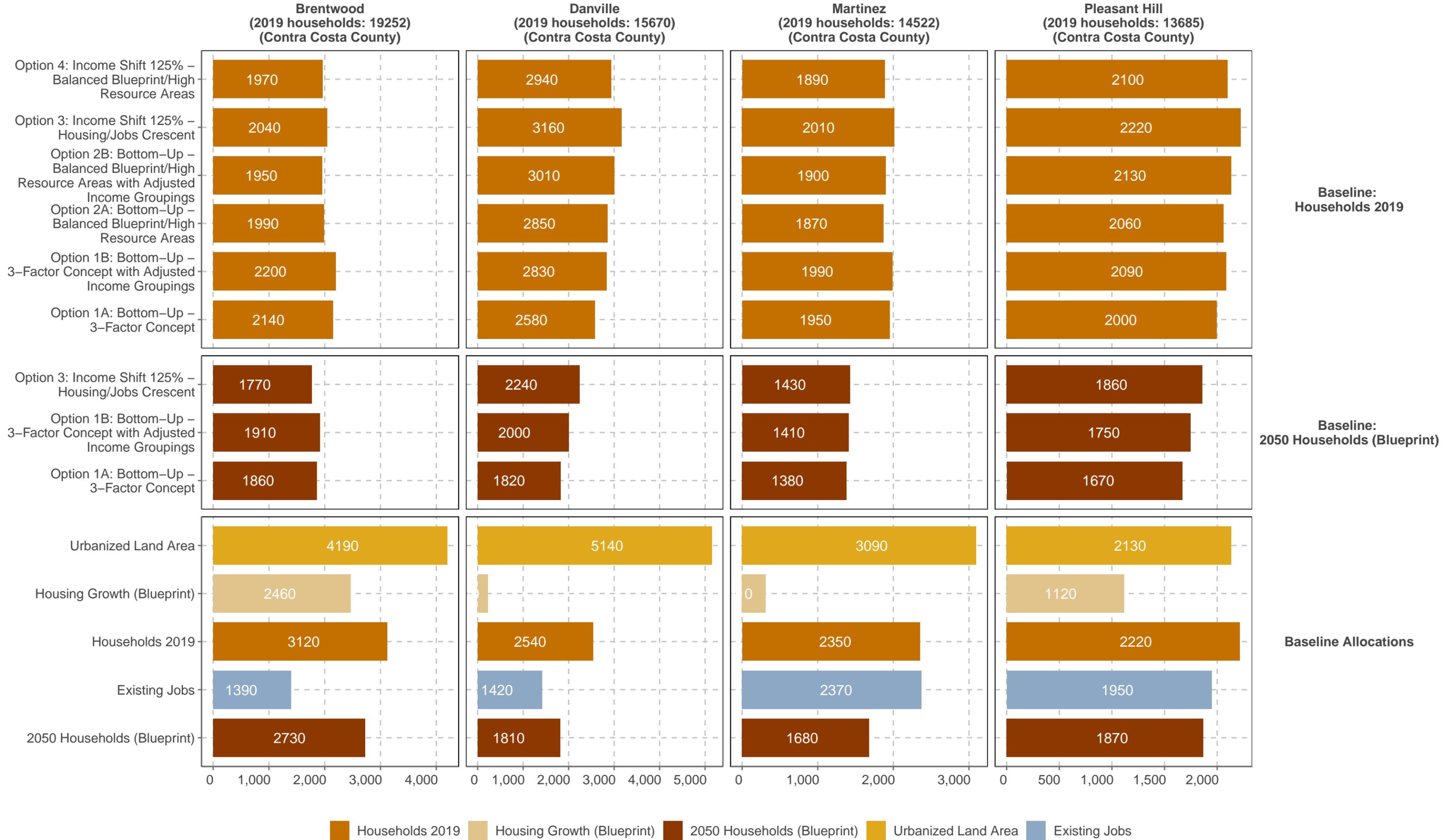
Appendix 2: Potential RHNA Allocation
Page 06 (Counties on Page: Contra Costa)

Chart shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details.
 Label shows allocation rounded to nearest 10.



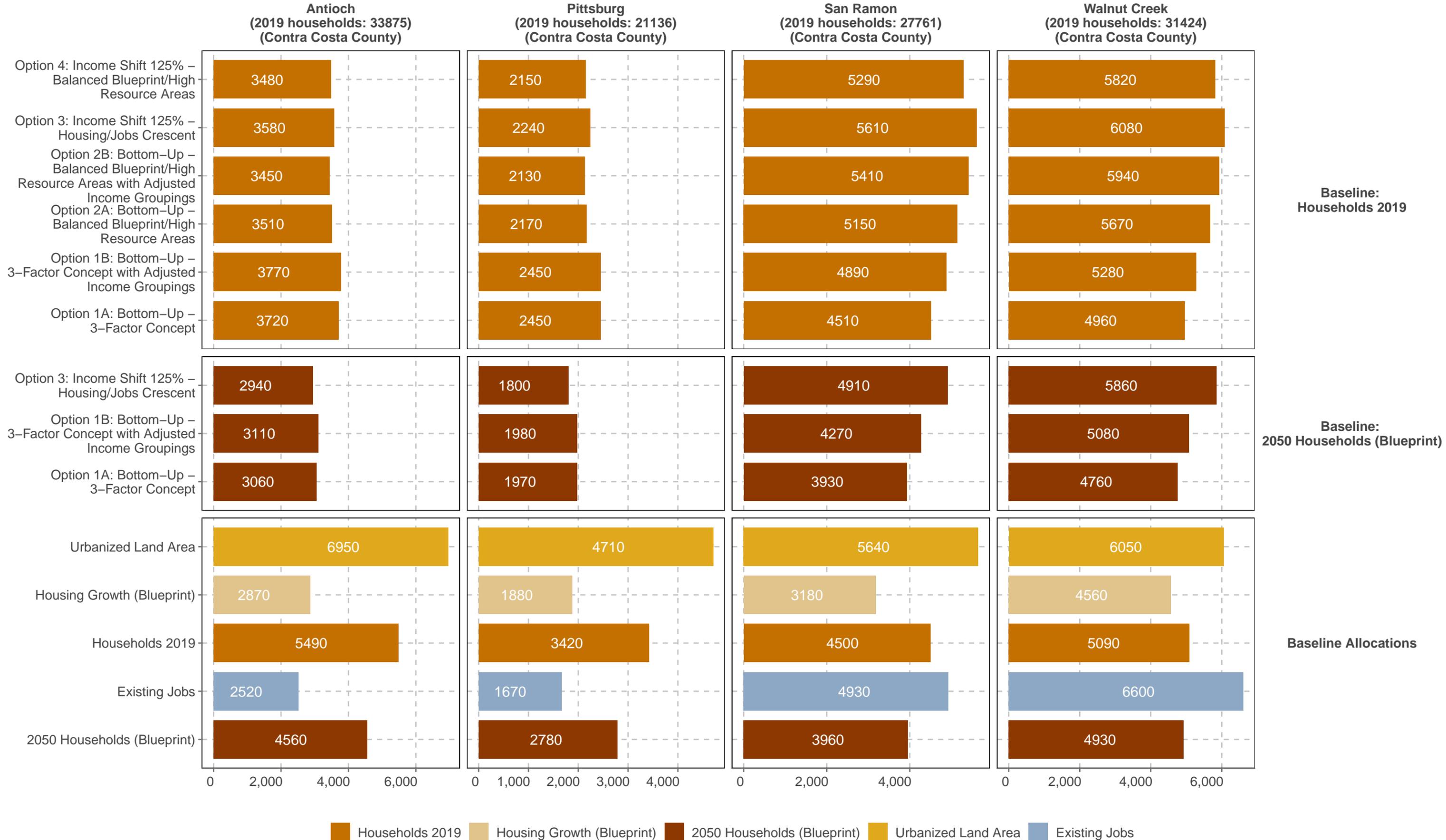
Appendix 2: Potential RHNA Allocation
Page 07 (Counties on Page: Contra Costa)

Chart shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details.
 Label shows allocation rounded to nearest 10.



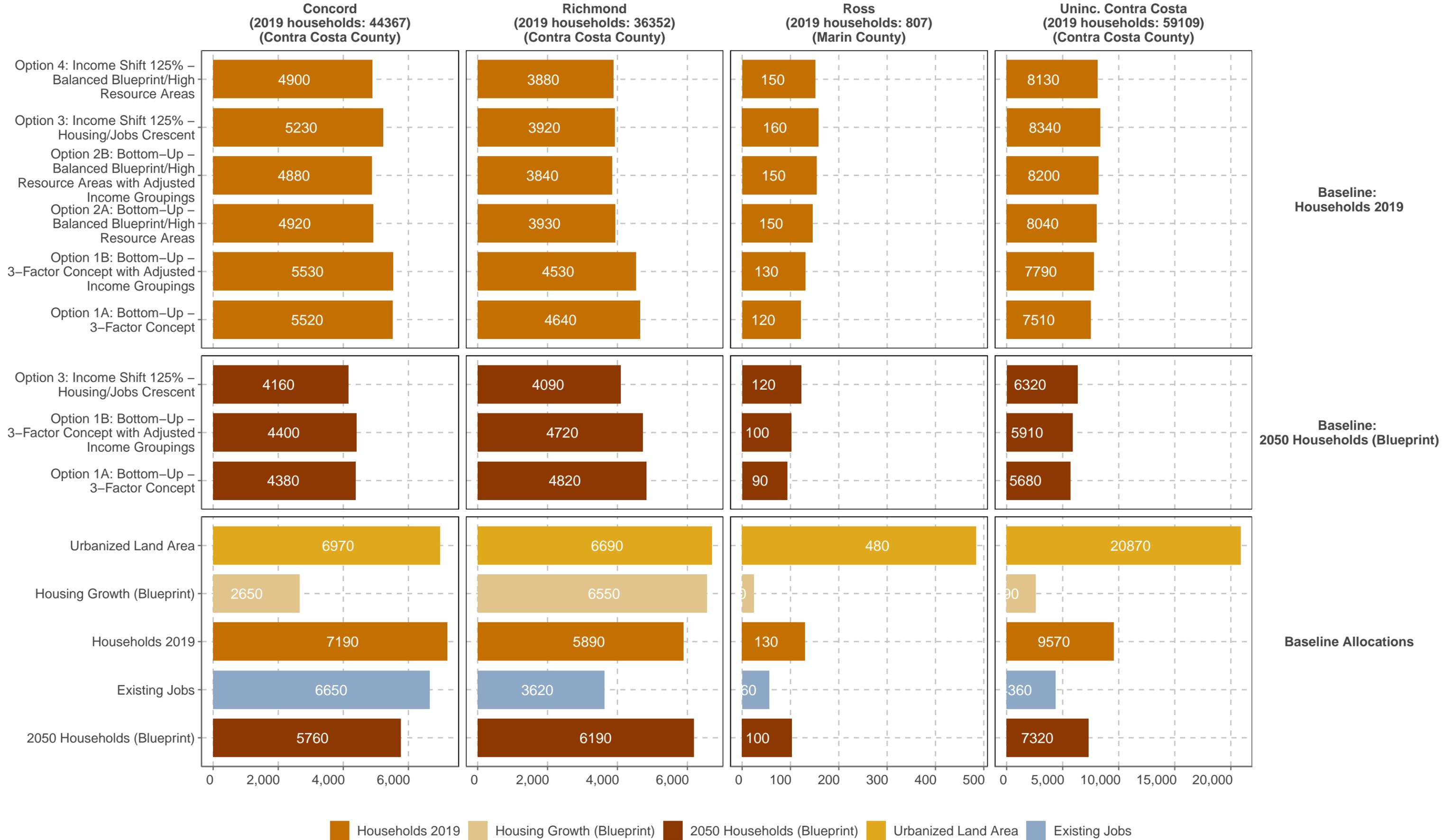
Appendix 2: Potential RHNA Allocation
Page 08 (Counties on Page: Contra Costa)

Chart shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details.
 Label shows allocation rounded to nearest 10.



Appendix 2: Potential RHNA Allocation
Page 09 (Counties on Page: Marin, Contra Costa)

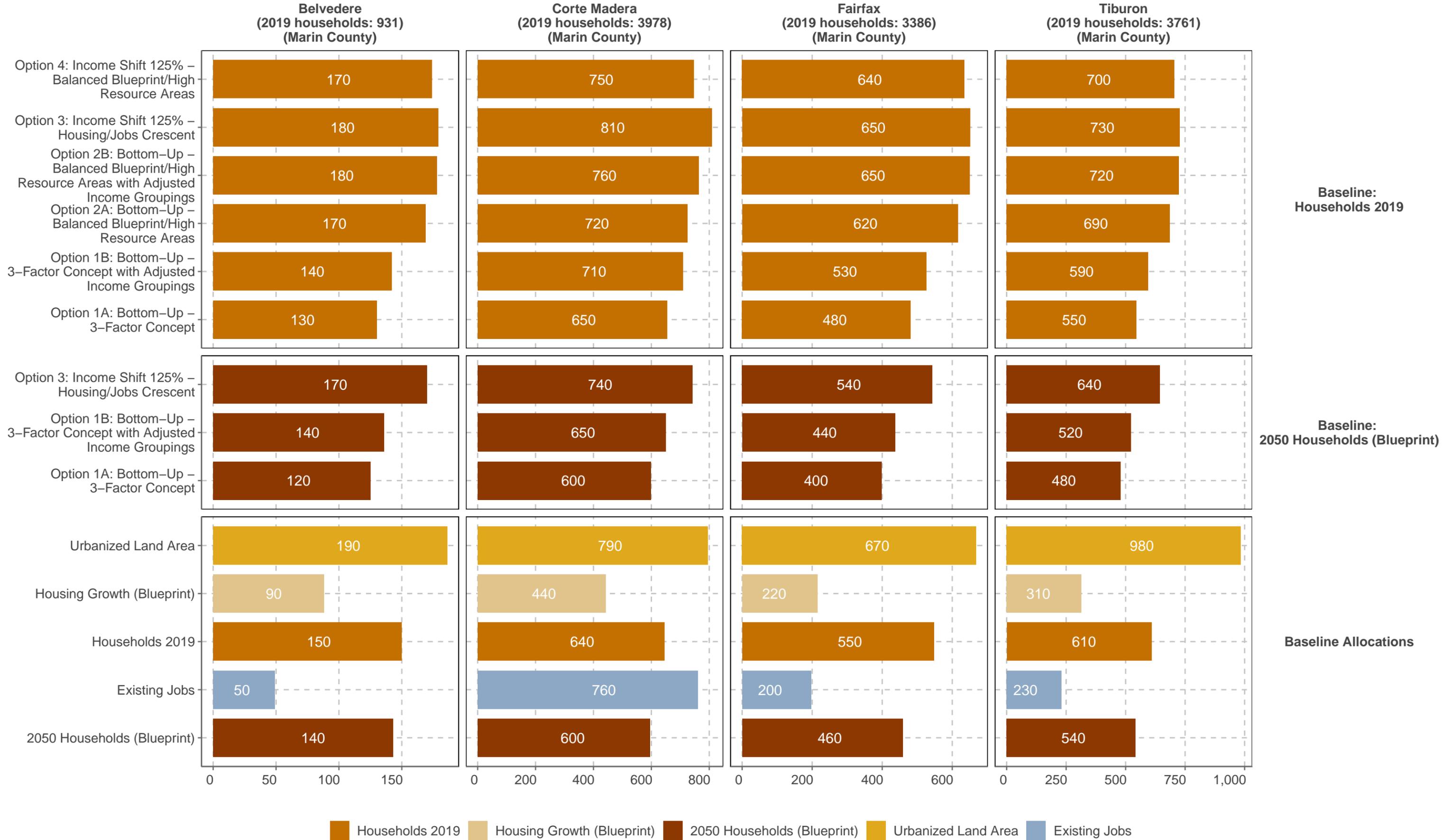
Chart shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details.
 Label shows allocation rounded to nearest 10.



Appendix 2: Potential RHNA Allocation

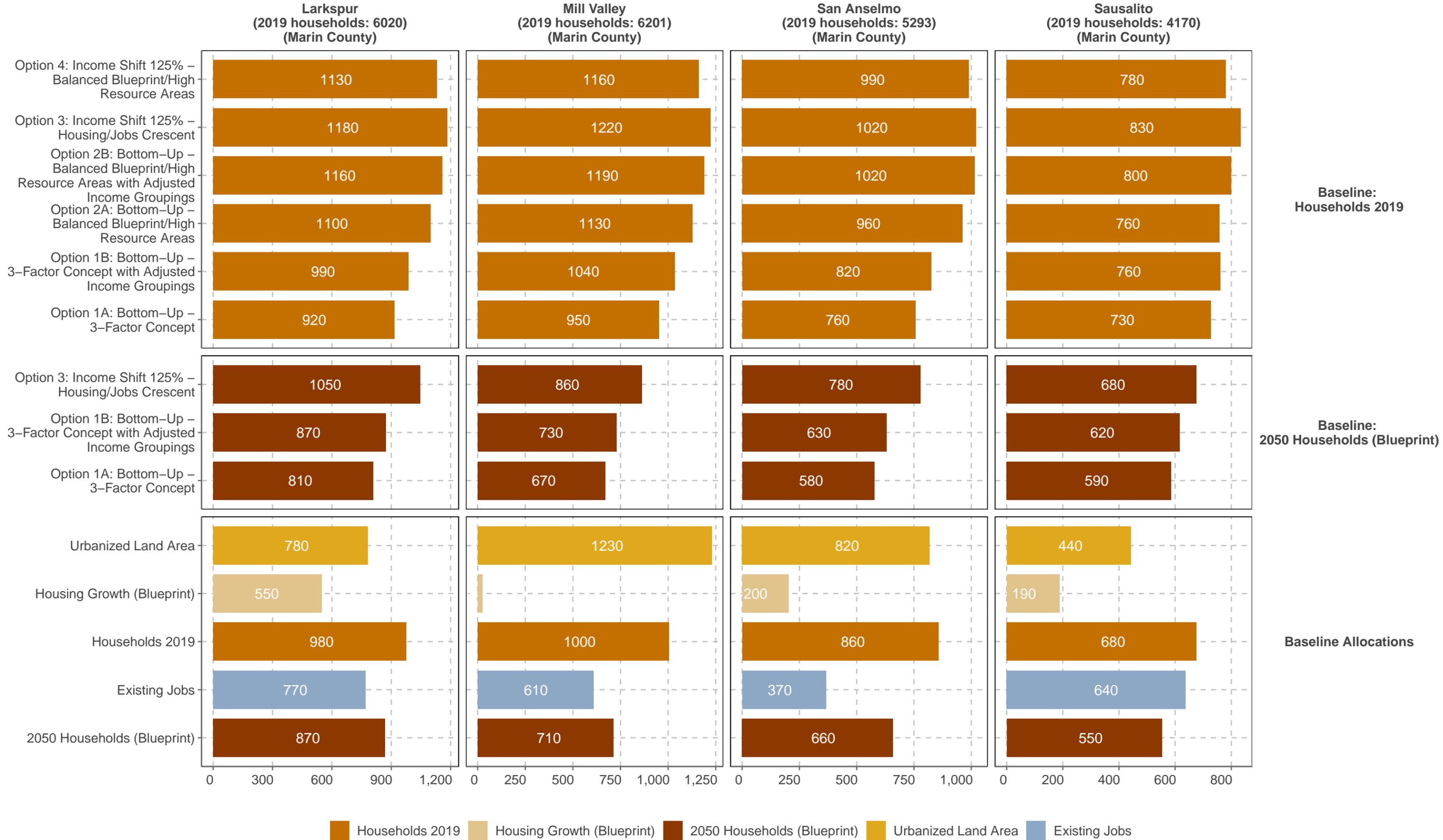
Page 10 (Counties on Page: Marin)

Chart shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details.
Label shows allocation rounded to nearest 10.



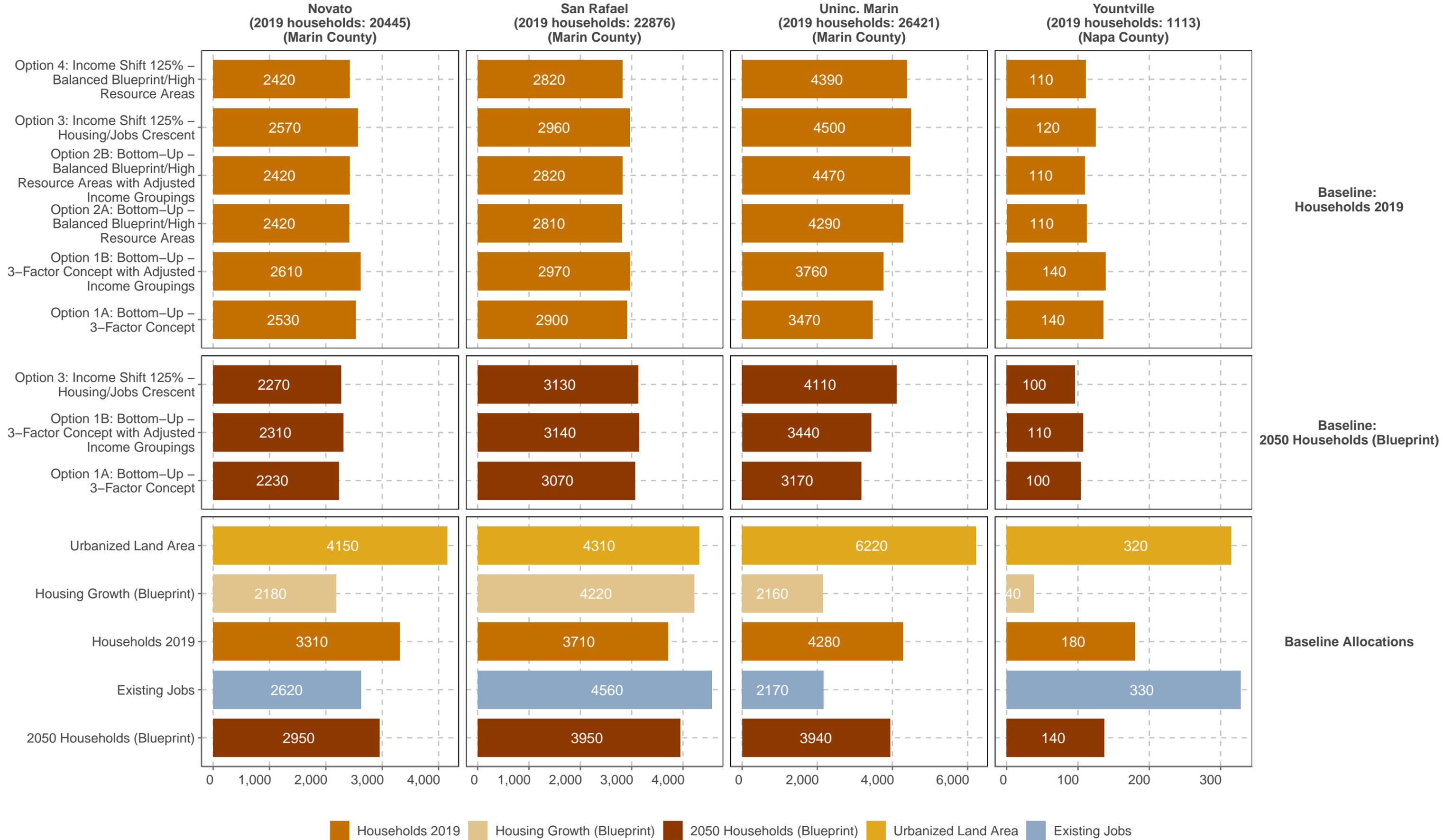
Appendix 2: Potential RHNA Allocation
Page 11 (Counties on Page: Marin)

Chart shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details.
 Label shows allocation rounded to nearest 10.



Appendix 2: Potential RHNA Allocation
Page 12 (Counties on Page: Marin, Napa)

Chart shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details.
 Label shows allocation rounded to nearest 10.



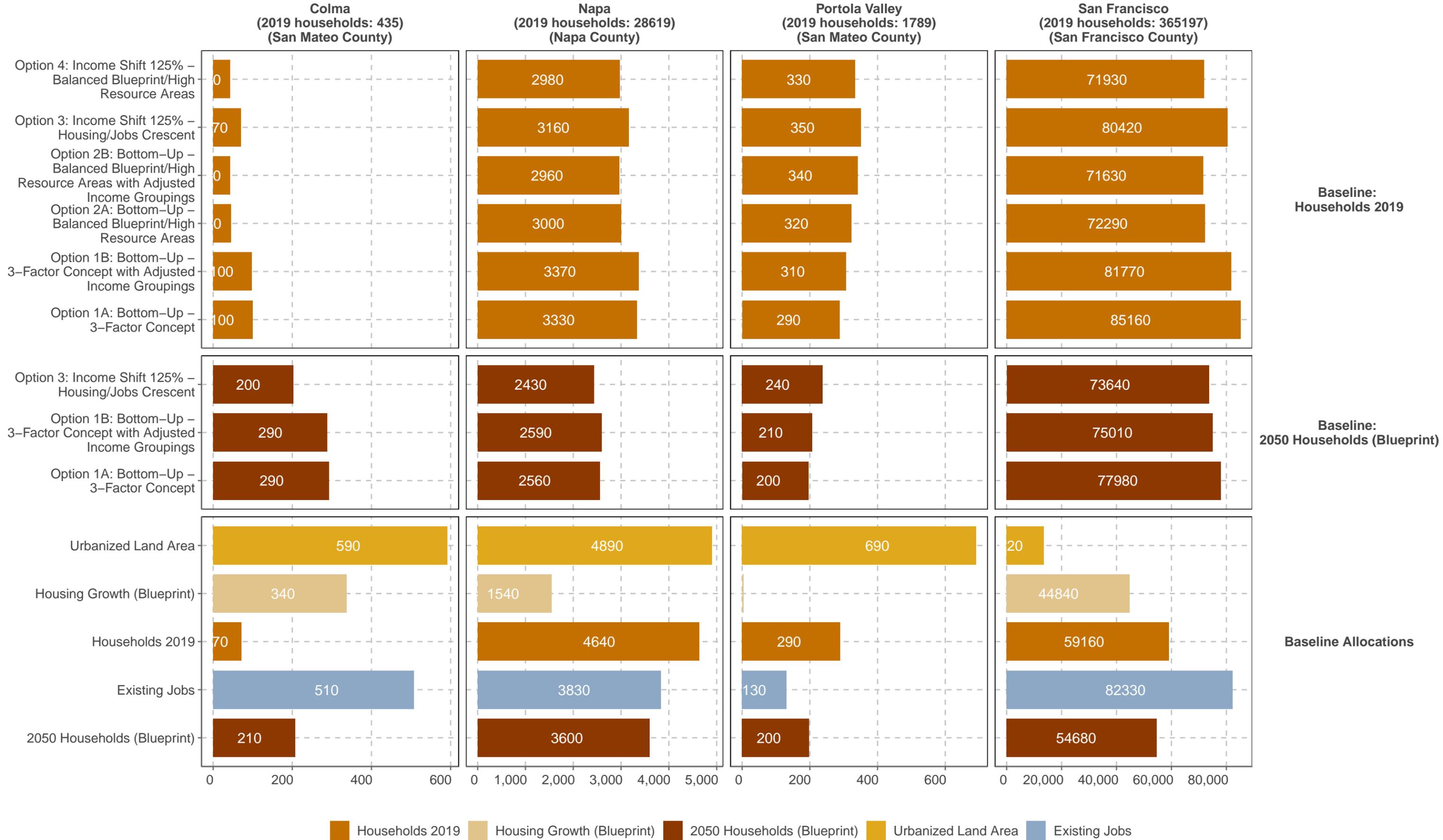
Appendix 2: Potential RHNA Allocation
Page 13 (Counties on Page: Napa)

Chart shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details.
 Label shows allocation rounded to nearest 10.



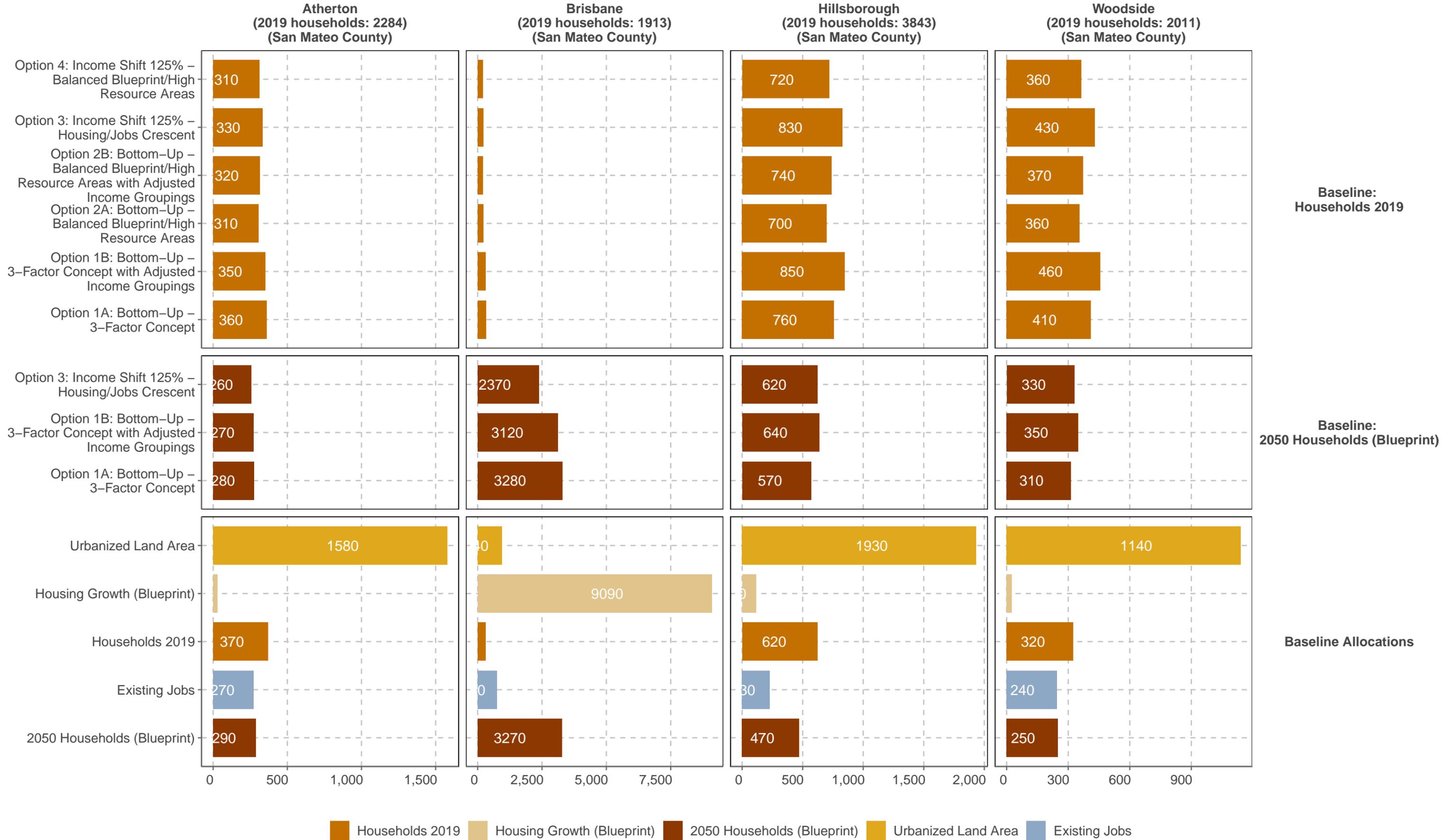
Appendix 2: Potential RHNA Allocation
Page 14 (Counties on Page: San Francisco, San Mateo, Napa)

Chart shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details.
 Label shows allocation rounded to nearest 10.



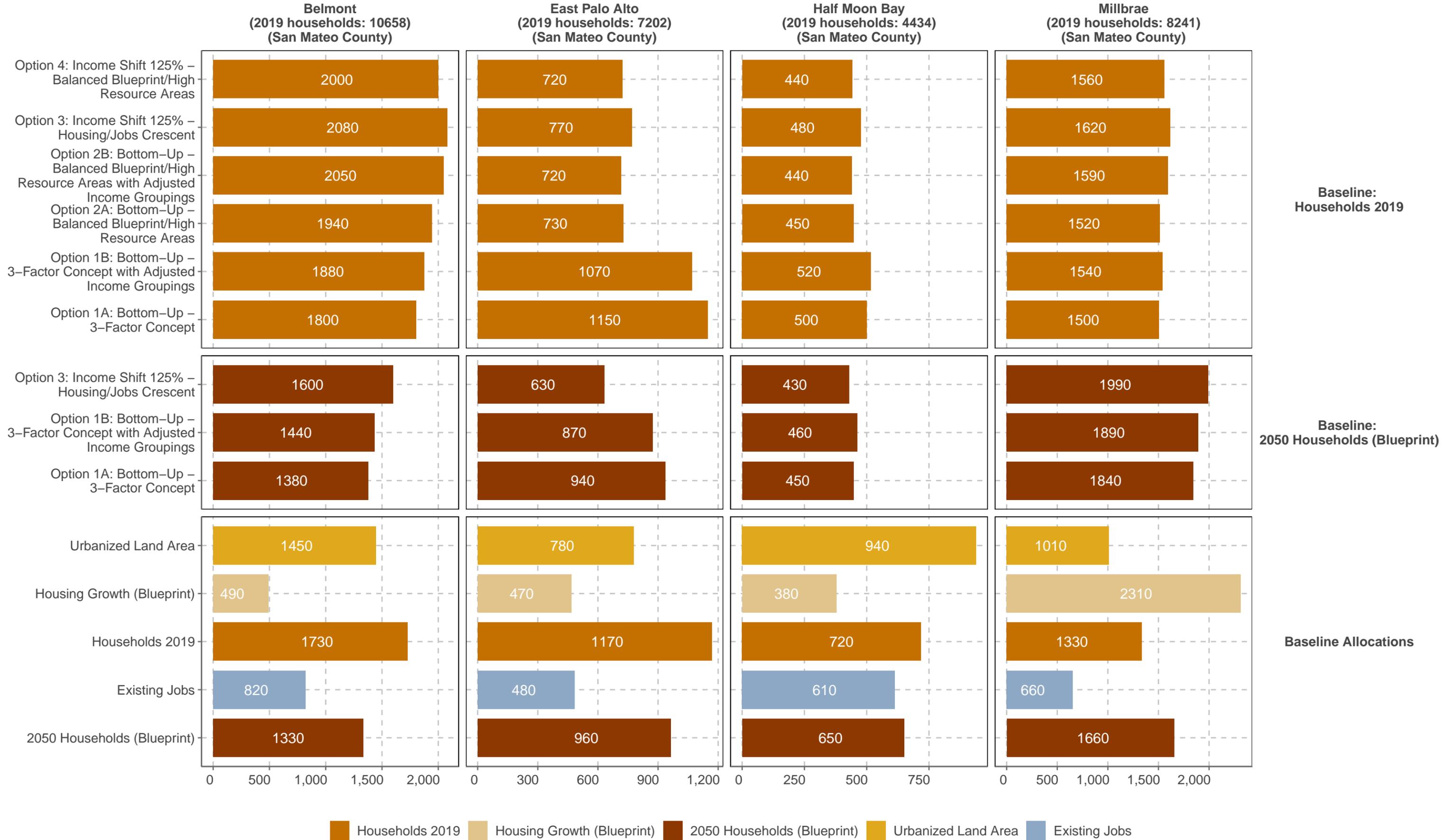
Appendix 2: Potential RHNA Allocation
Page 15 (Counties on Page: San Mateo)

Chart shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details.
 Label shows allocation rounded to nearest 10.



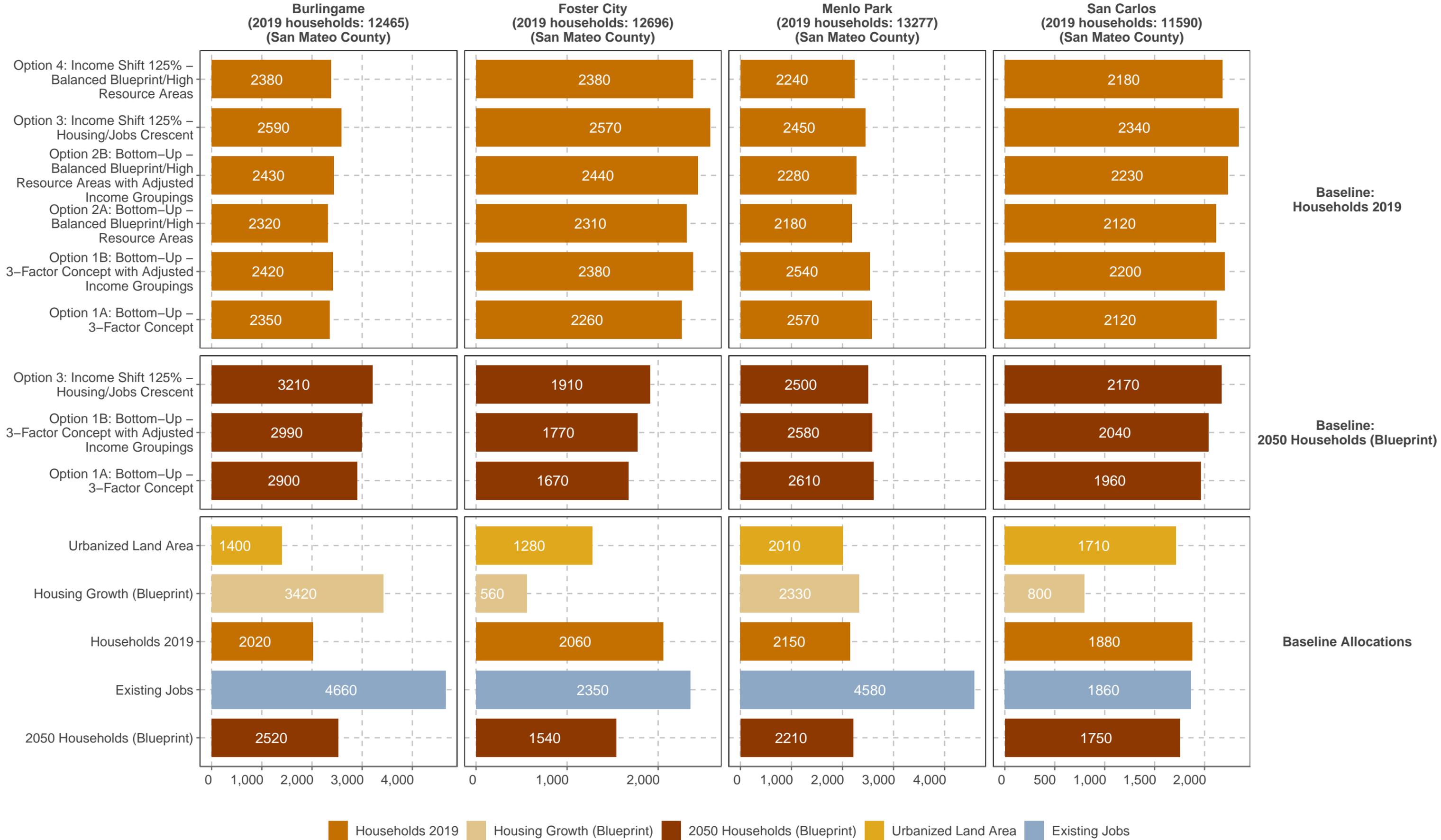
Appendix 2: Potential RHNA Allocation
Page 16 (Counties on Page: San Mateo)

Chart shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details.
 Label shows allocation rounded to nearest 10.



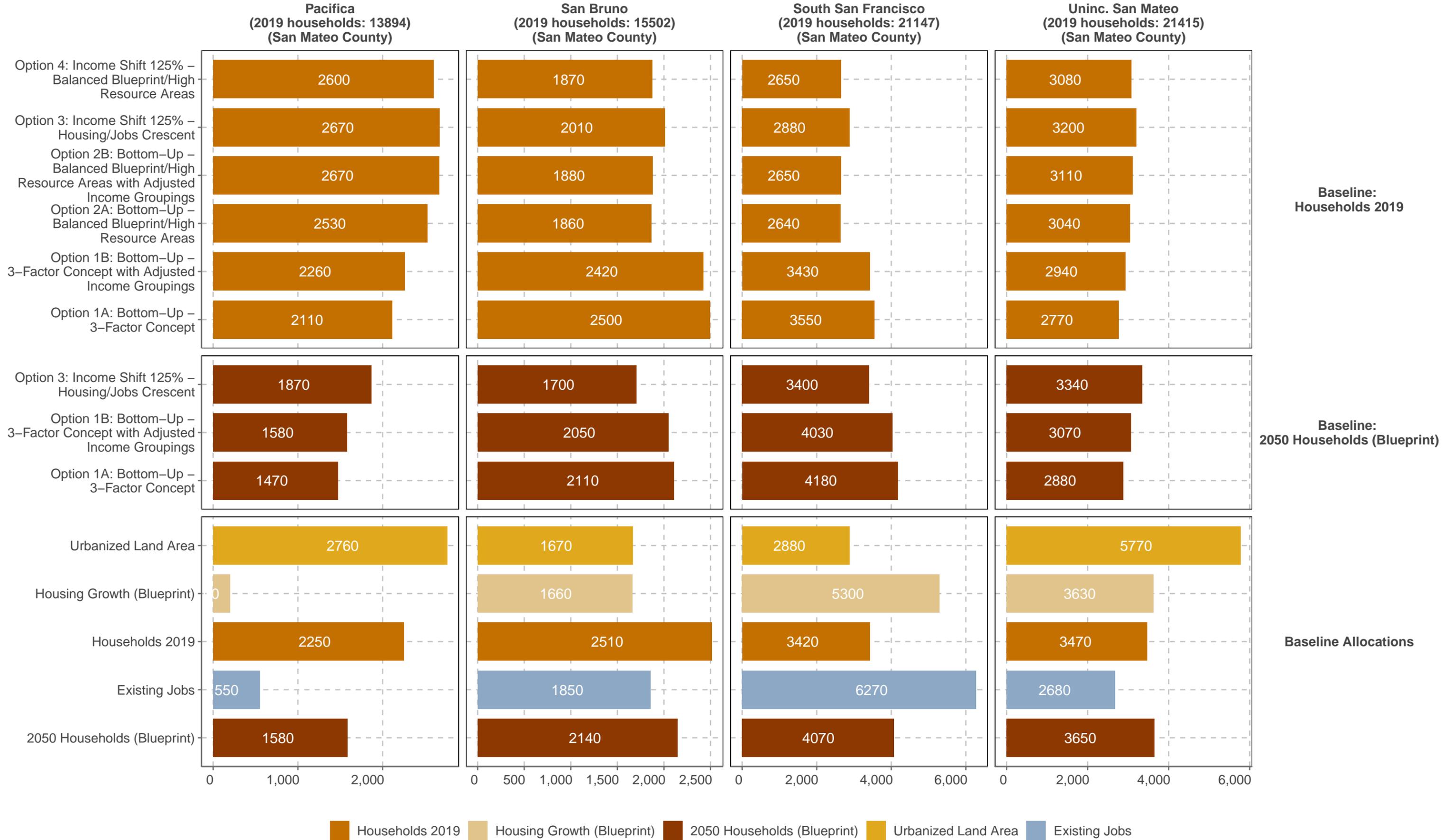
Appendix 2: Potential RHNA Allocation
Page 17 (Counties on Page: San Mateo)

Chart shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details.
 Label shows allocation rounded to nearest 10.



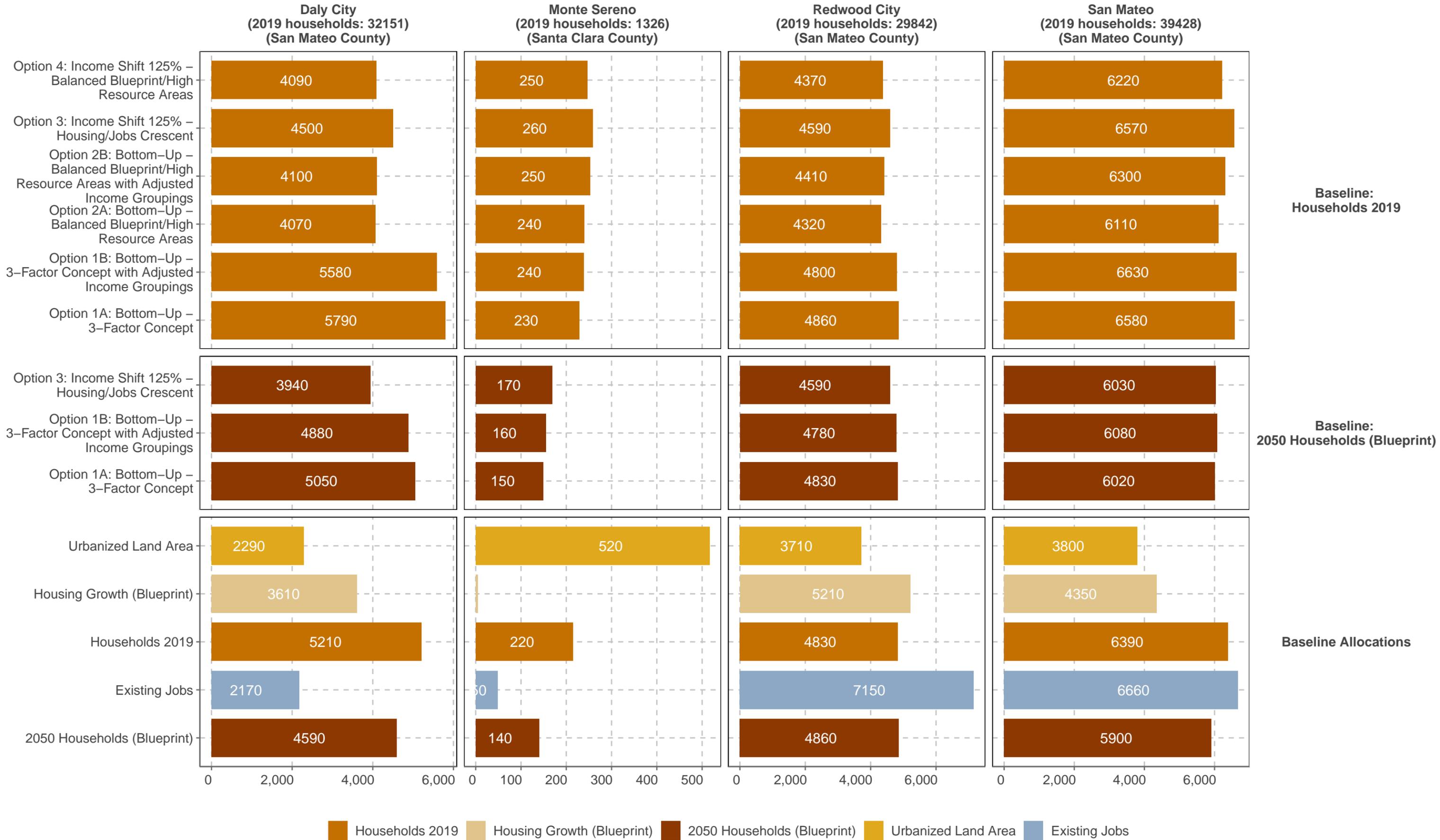
Appendix 2: Potential RHNA Allocation
Page 18 (Counties on Page: San Mateo)

Chart shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details.
 Label shows allocation rounded to nearest 10.



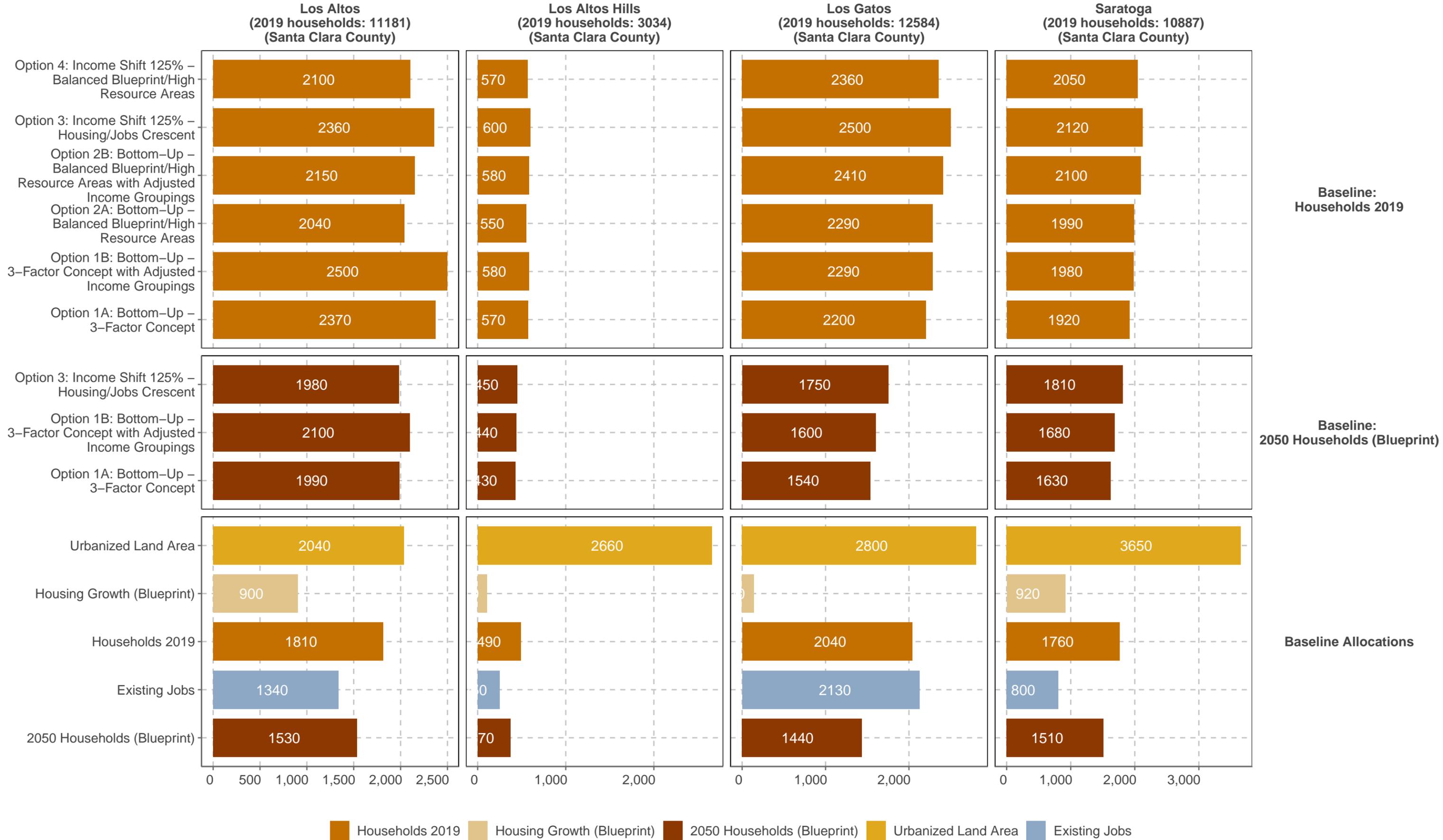
Appendix 2: Potential RHNA Allocation
Page 19 (Counties on Page: San Mateo, Santa Clara)

Chart shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details.
 Label shows allocation rounded to nearest 10.



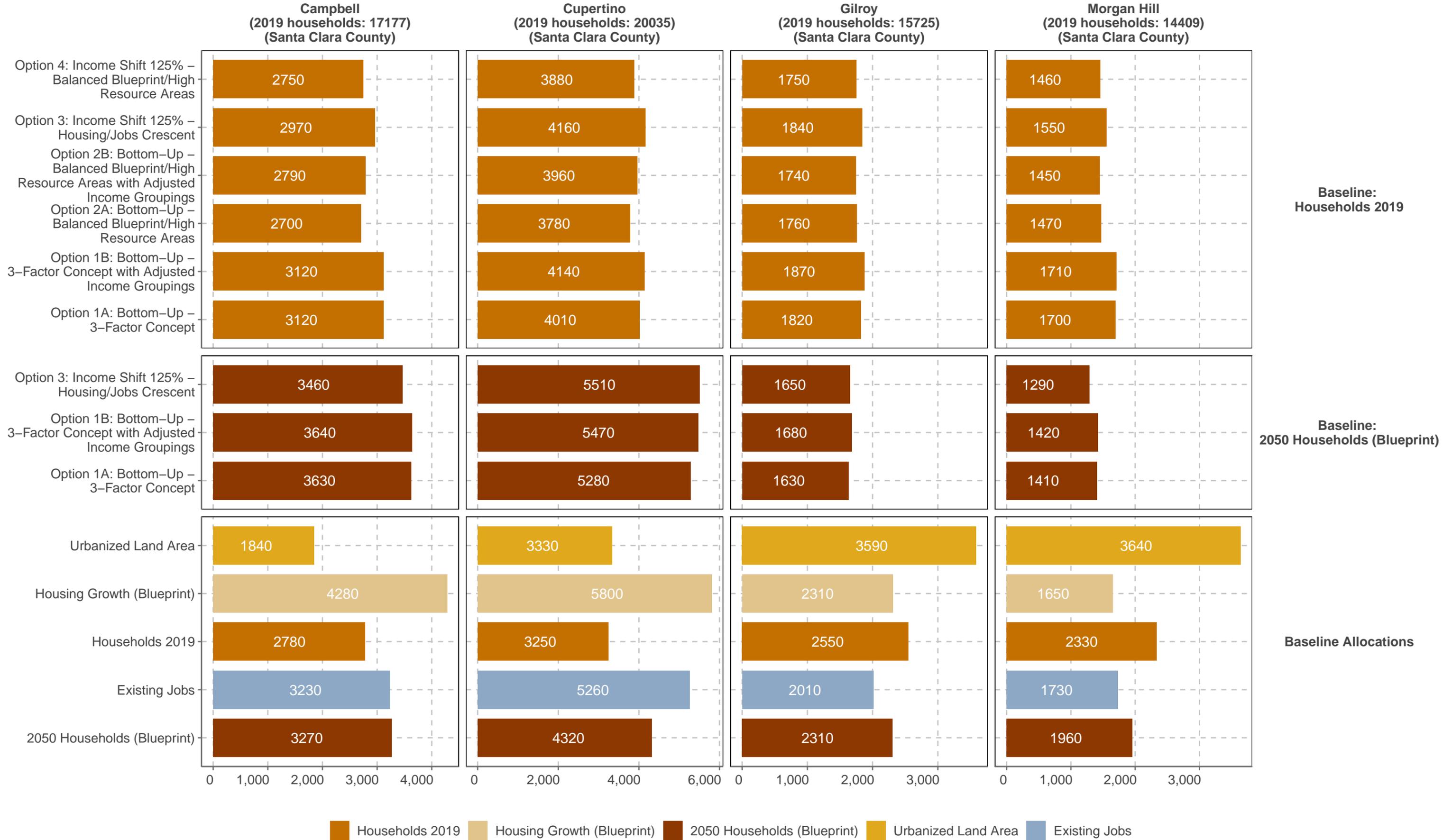
Appendix 2: Potential RHNA Allocation
Page 20 (Counties on Page: Santa Clara)

Chart shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details.
 Label shows allocation rounded to nearest 10.



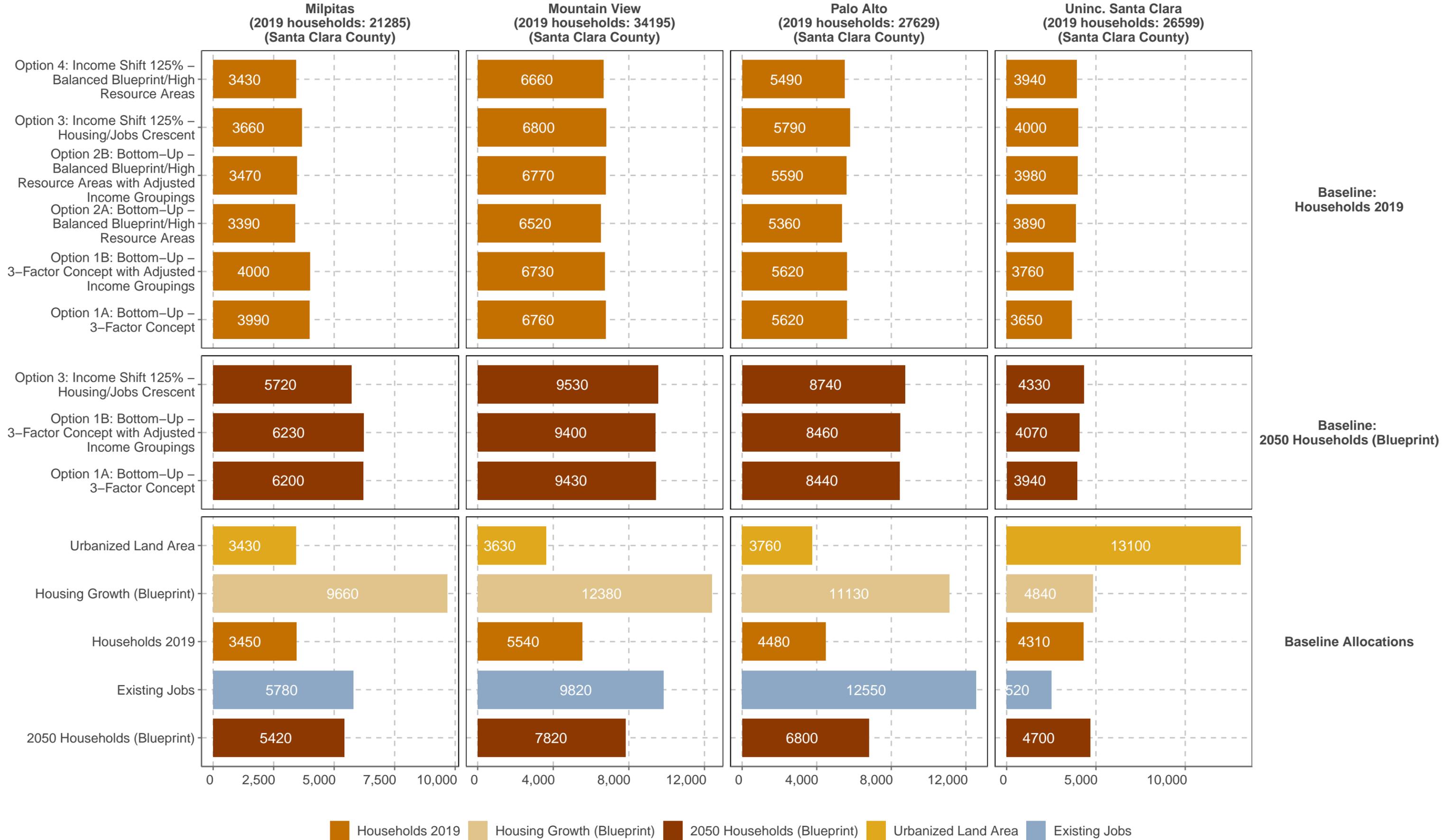
Appendix 2: Potential RHNA Allocation
Page 21 (Counties on Page: Santa Clara)

Chart shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details.
 Label shows allocation rounded to nearest 10.



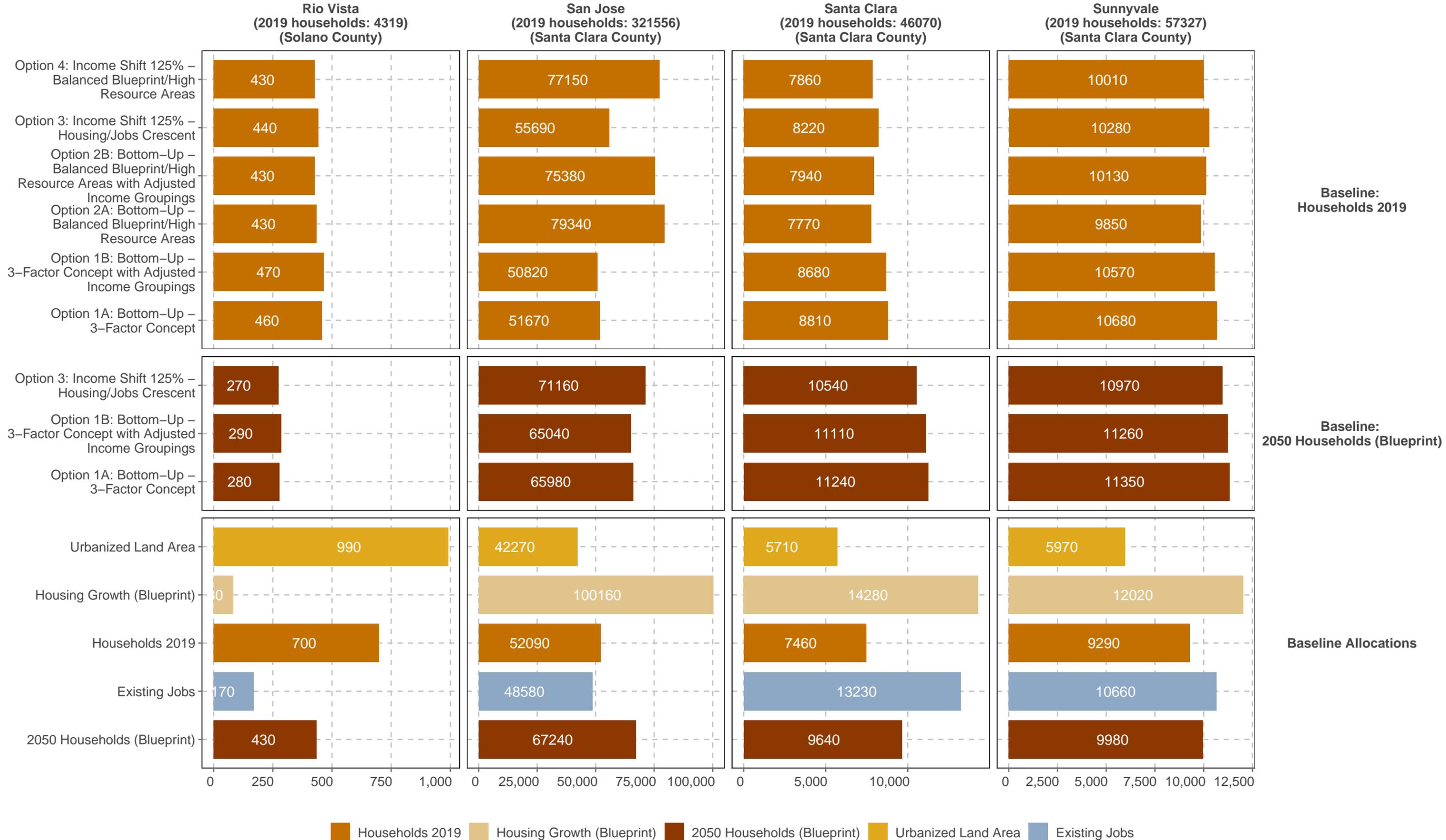
Appendix 2: Potential RHNA Allocation
Page 22 (Counties on Page: Santa Clara)

Chart shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details.
 Label shows allocation rounded to nearest 10.



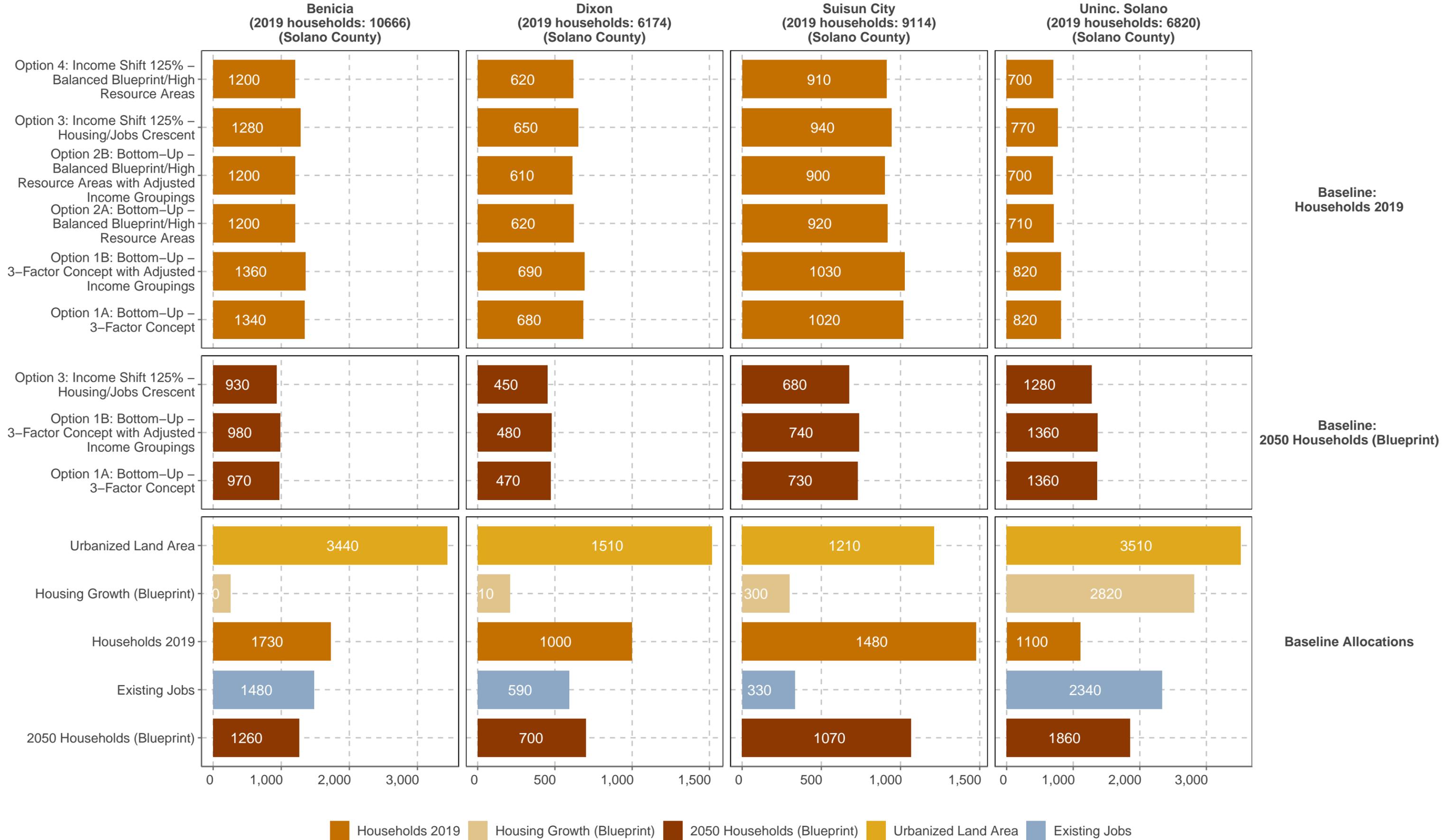
Appendix 2: Potential RHNA Allocation
Page 23 (Counties on Page: Solano, Santa Clara)

Chart shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details.
 Label shows allocation rounded to nearest 10.



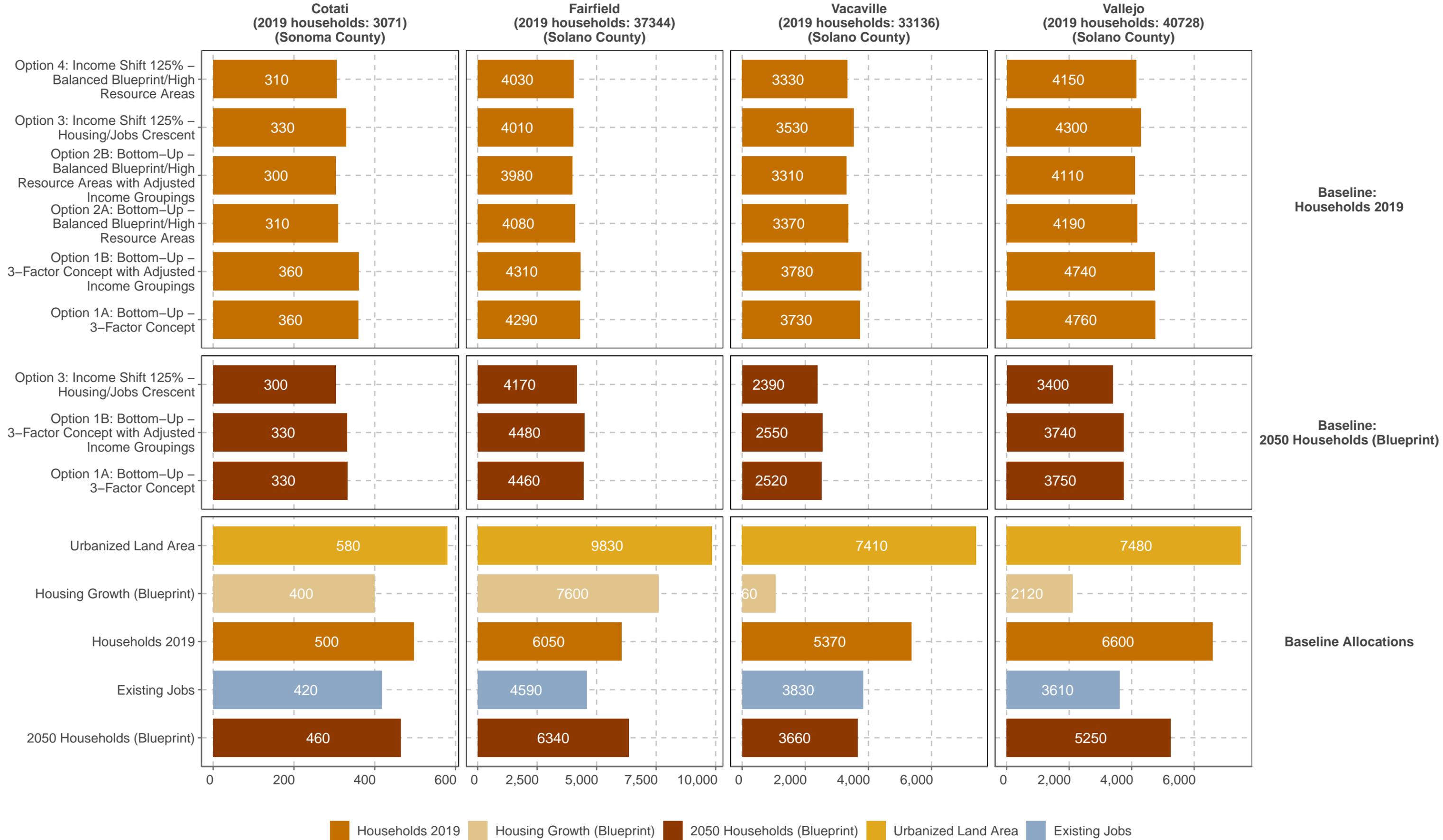
Appendix 2: Potential RHNA Allocation Page 24 (Counties on Page: Solano)

Chart shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details.
Label shows allocation rounded to nearest 10.



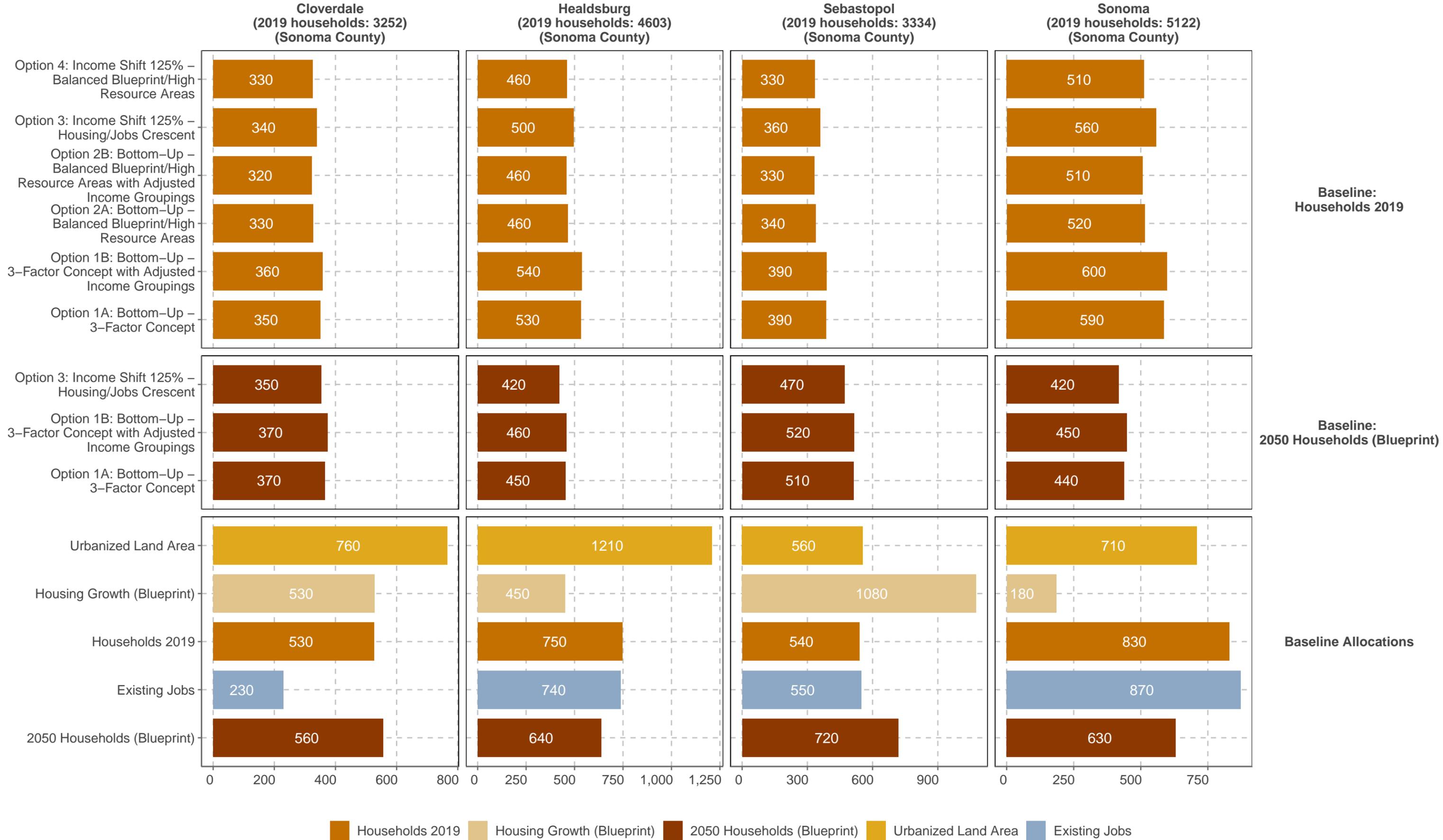
Appendix 2: Potential RHNA Allocation
Page 25 (Counties on Page: Sonoma, Solano)

Chart shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details.
 Label shows allocation rounded to nearest 10.



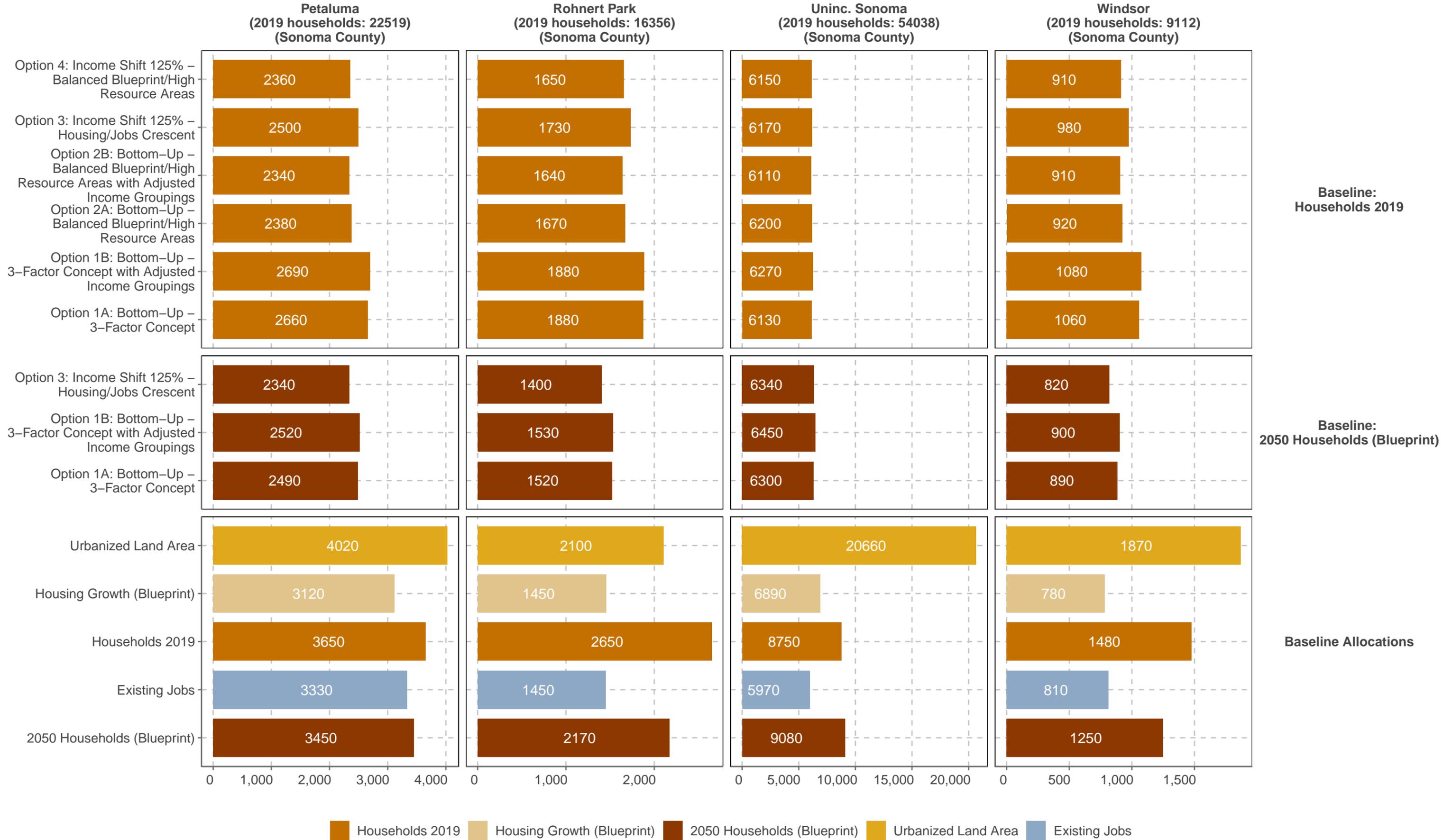
Appendix 2: Potential RHNA Allocation
Page 26 (Counties on Page: Sonoma)

Chart shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details.
 Label shows allocation rounded to nearest 10.



Appendix 2: Potential RHNA Allocation
Page 27 (Counties on Page: Sonoma)

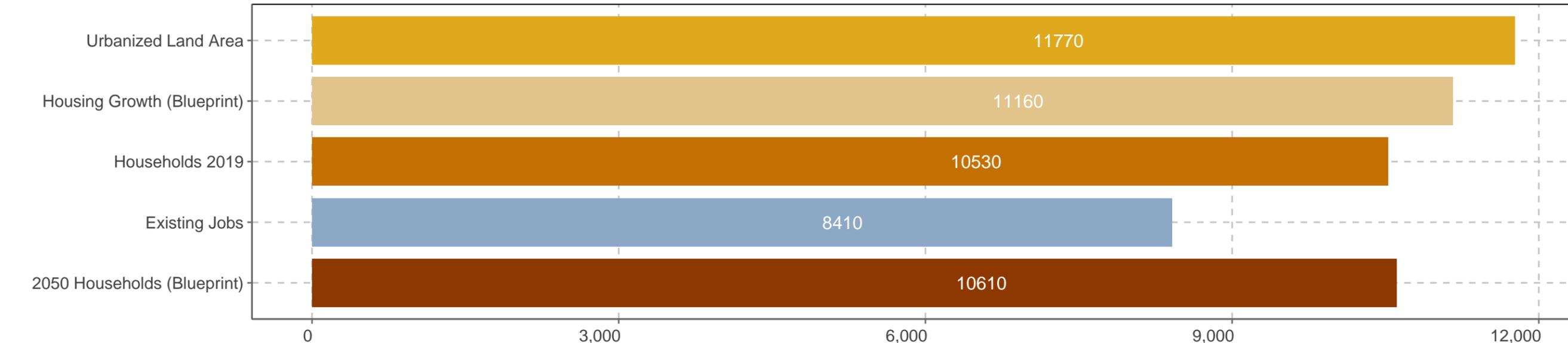
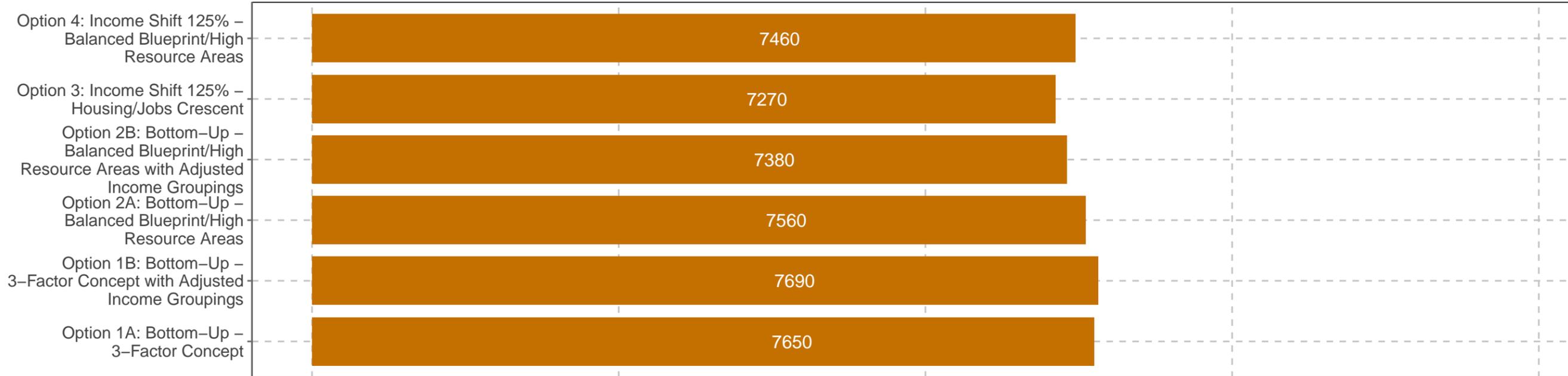
Chart shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details.
 Label shows allocation rounded to nearest 10.



Appendix 2: Potential RHNA Allocation
Page 28 (Counties on Page: Sonoma)

Chart shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details.
 Label shows allocation rounded to nearest 10.

Santa Rosa
(2019 households: 64977)
(Sonoma County)

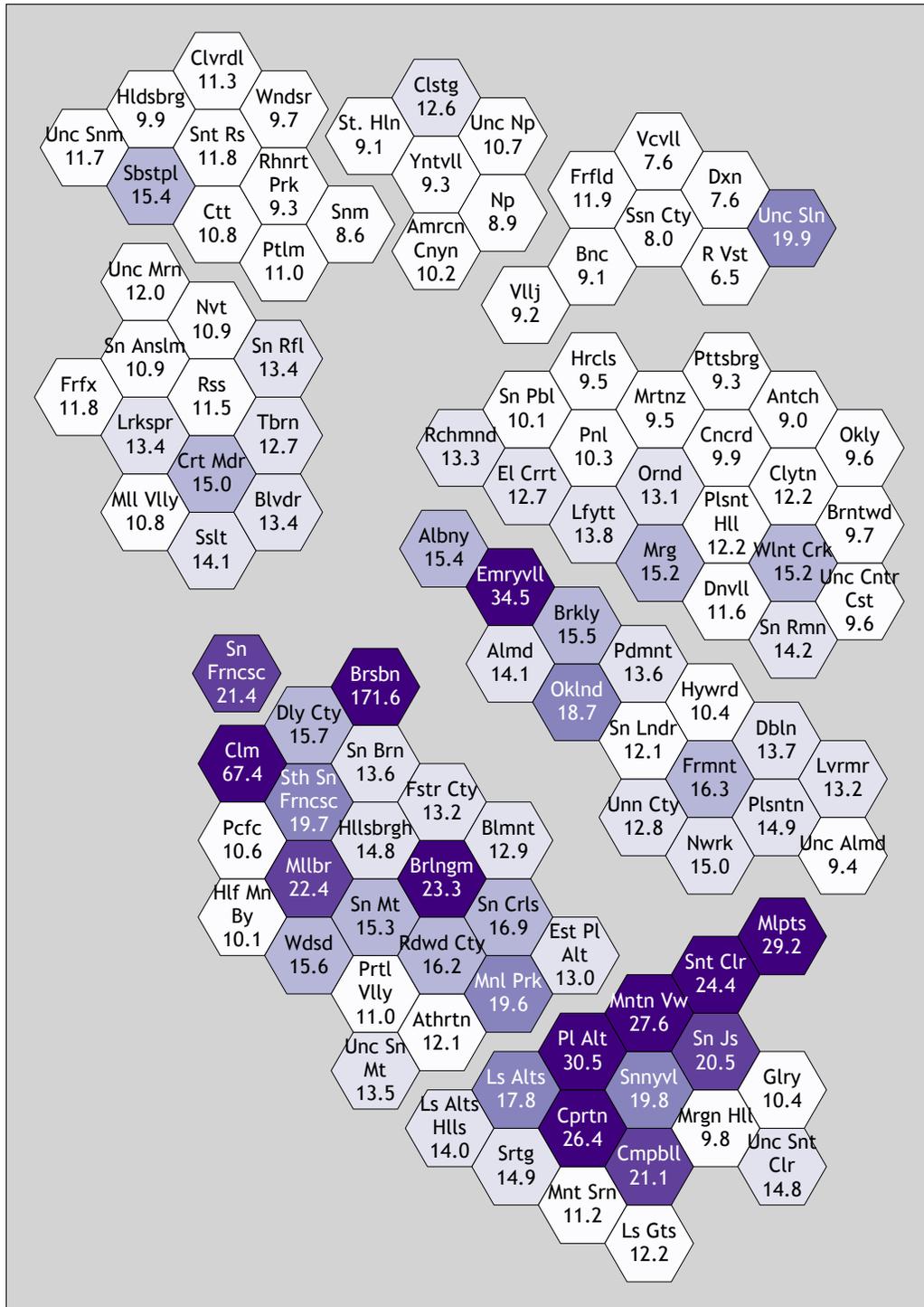


Households 2019 Housing Growth (Blueprint) 2050 Households (Blueprint) Urbanized Land Area Existing Jobs

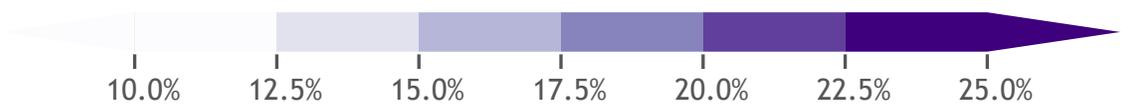
Appendix 3: Potential RHNA Allocation

Map shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details

Option 1A: Bottom-Up - 3-Factor Concept (Baseline: 2050 Households (Blueprint))



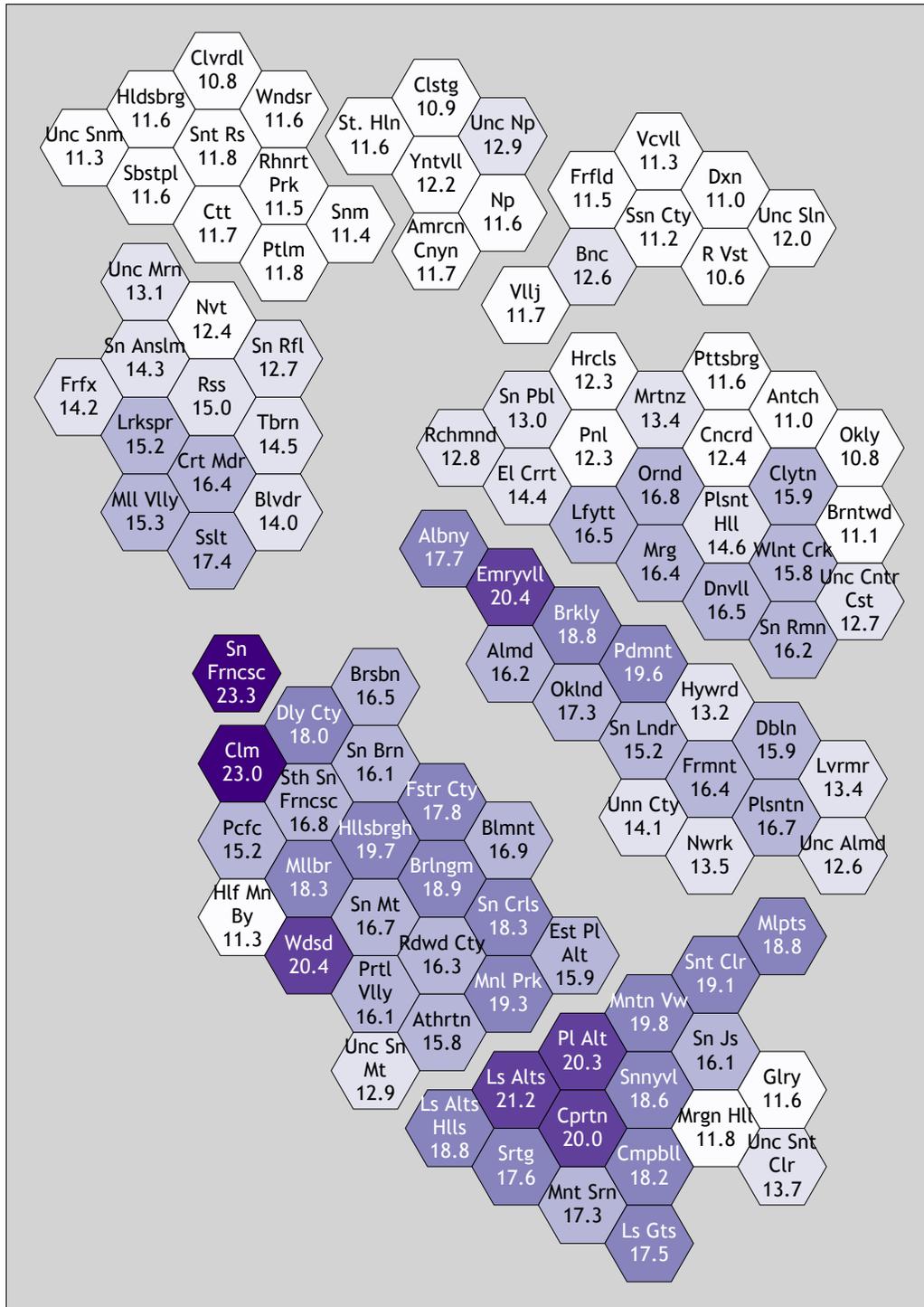
Jurisdiction Growth Rate



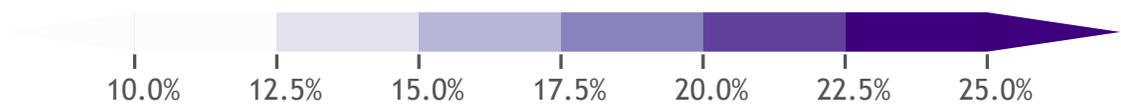
Appendix 3: Potential RHNA Allocation

Map shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details

Option 1A: Bottom-Up - 3-Factor Concept (Baseline: Households 2019)



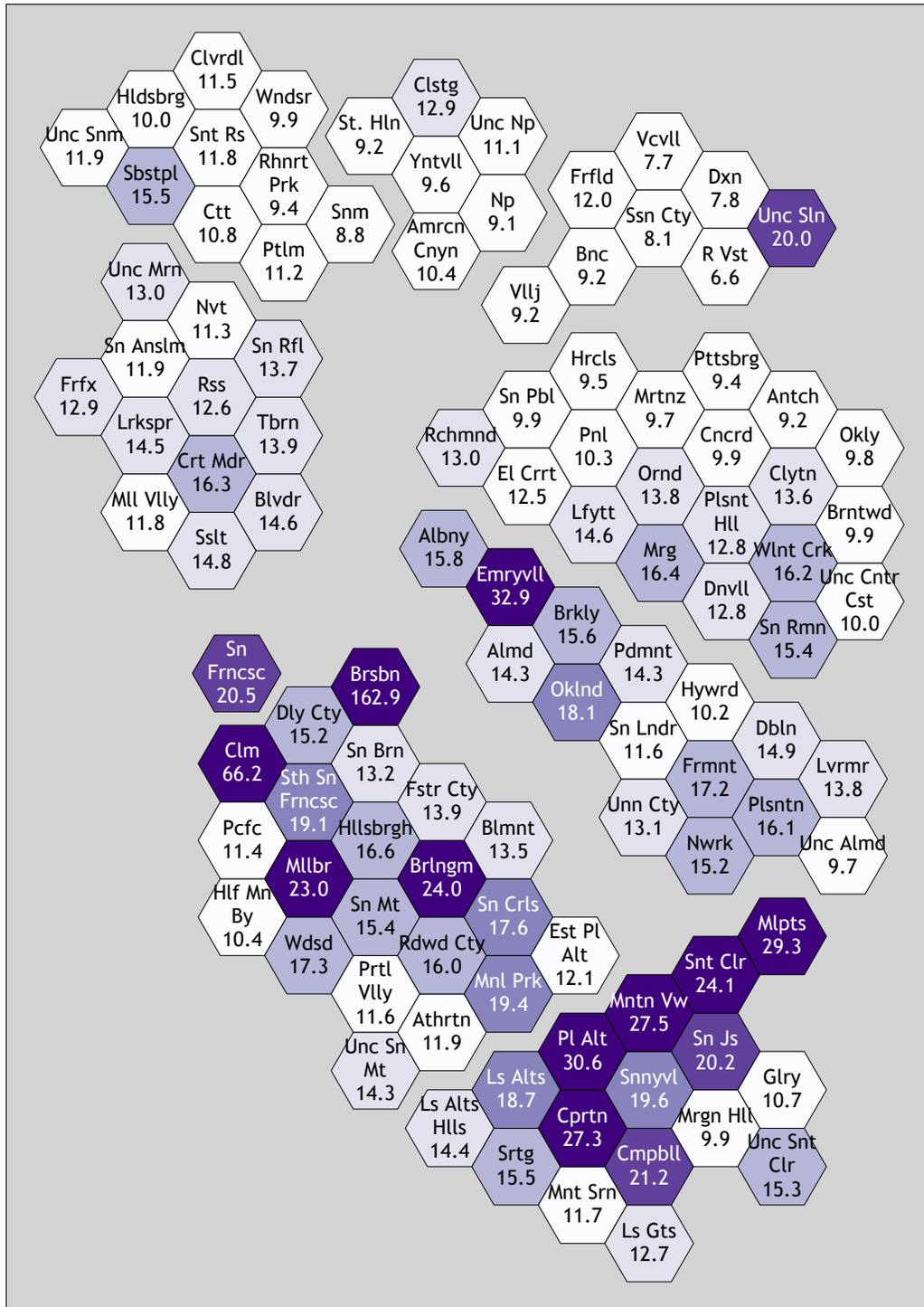
Jurisdiction Growth Rate



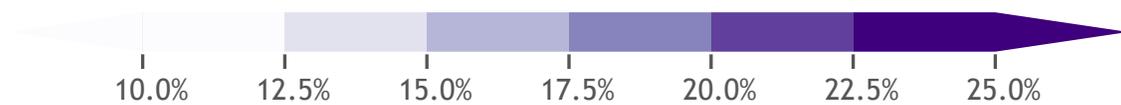
Appendix 3: Potential RHNA Allocation

Map shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details

Option 1B: Bottom-Up - 3-Factor Concept with Adjusted Income Groupings (Baseline: 2050 Households (Blueprint))



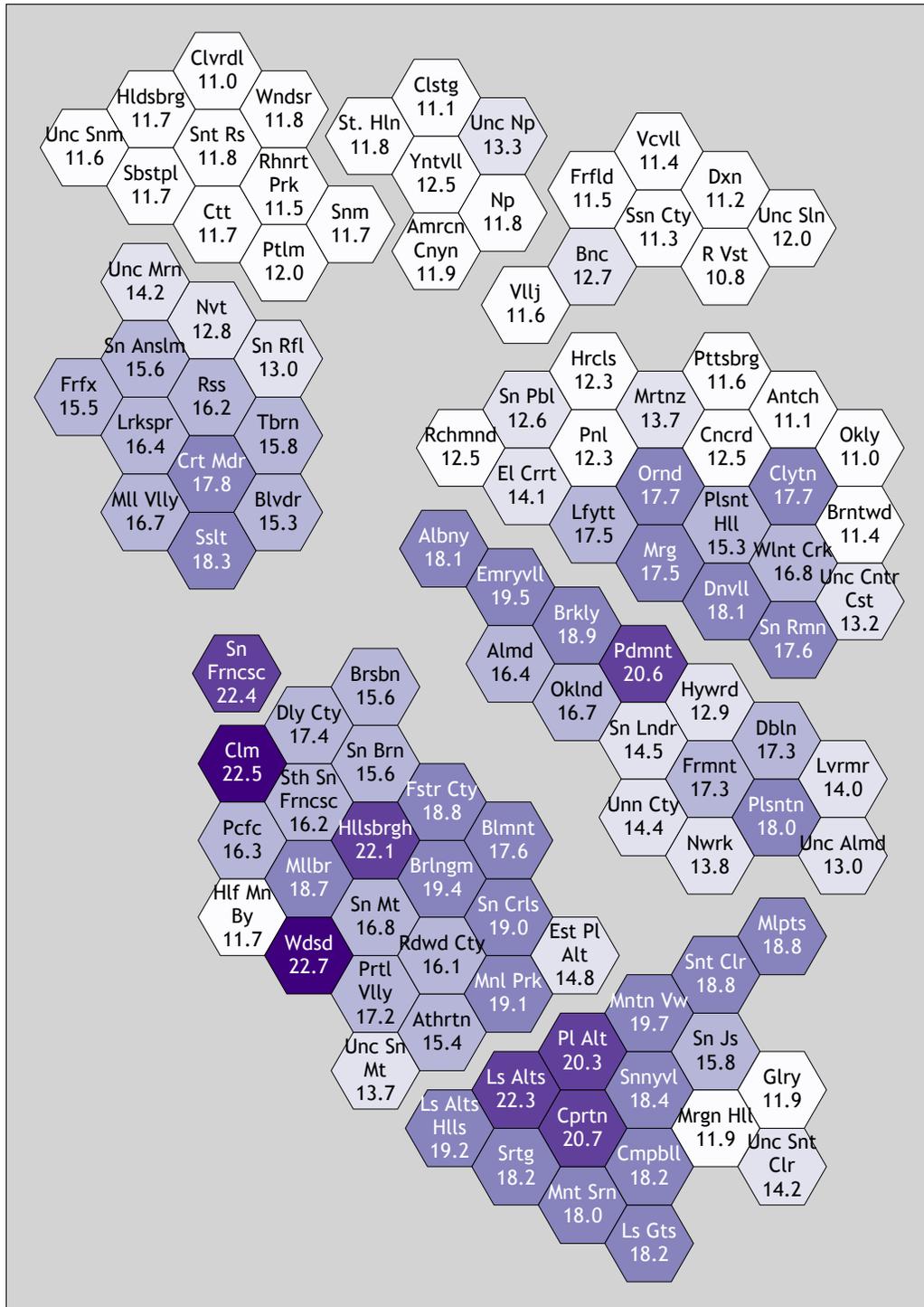
Jurisdiction Growth Rate



Appendix 3: Potential RHNA Allocation

Map shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details

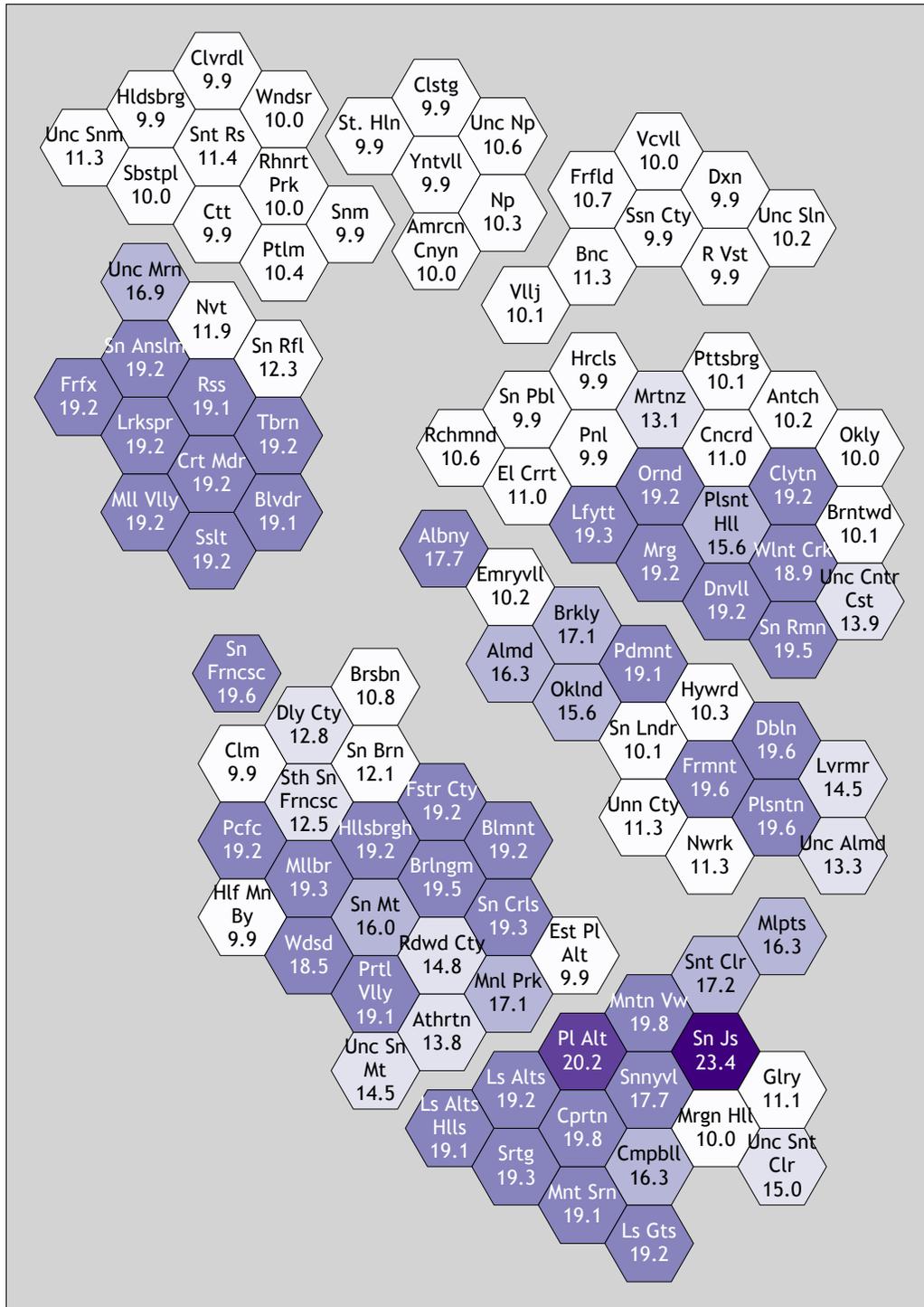
Option 1B: Bottom-Up - 3-Factor Concept with Adjusted Income Groupings (Baseline: Households 2019)



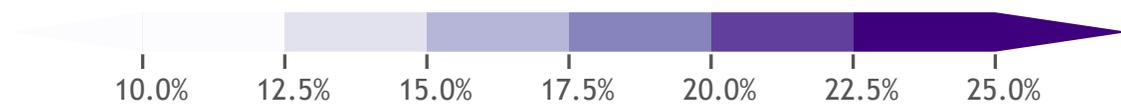
Appendix 3: Potential RHNA Allocation

Map shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details

Option 2B: Bottom-Up - Balanced Blueprint/High Resource Areas with Adjusted Income Groupings (Baseline: Households 2019)



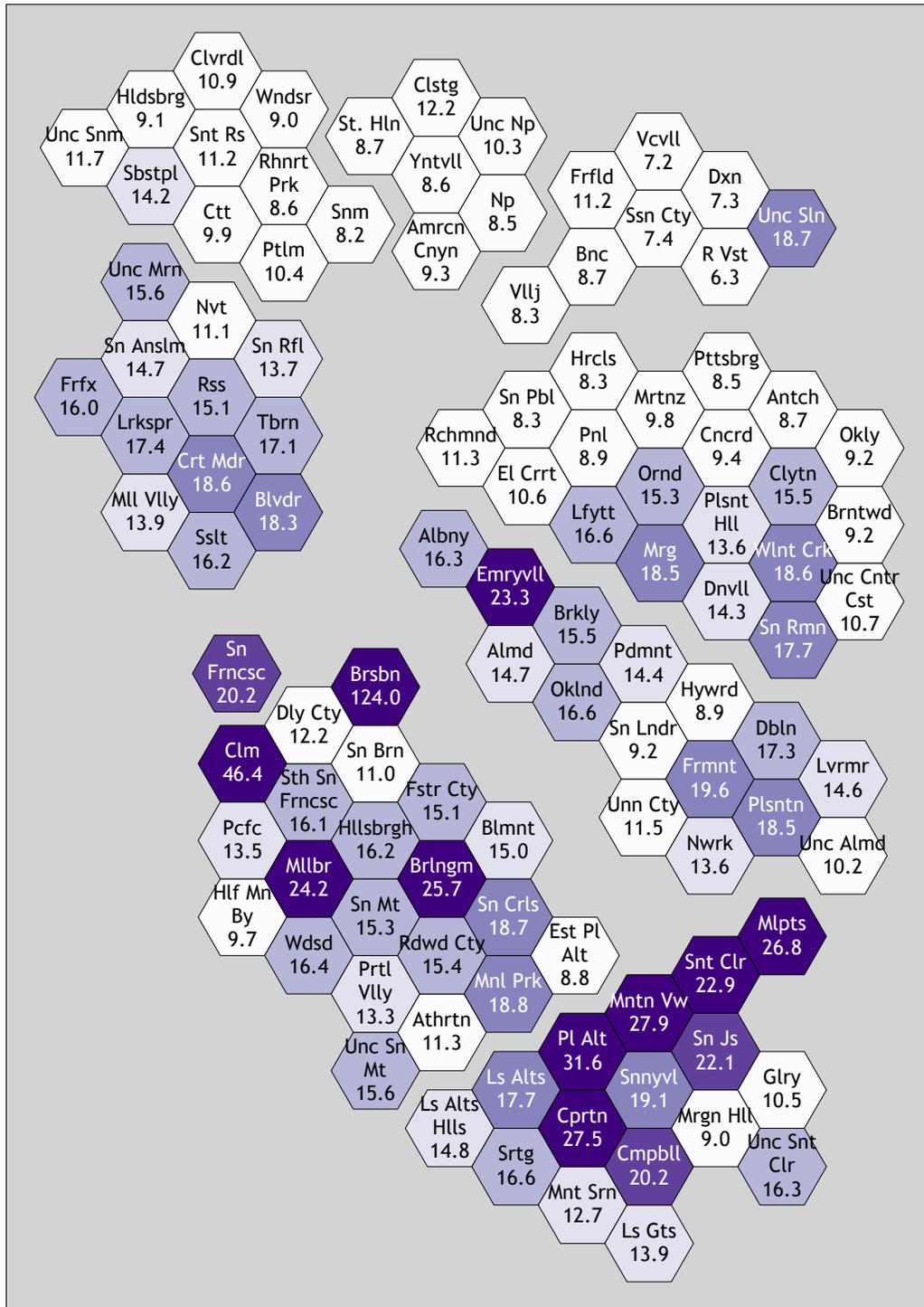
Jurisdiction Growth Rate



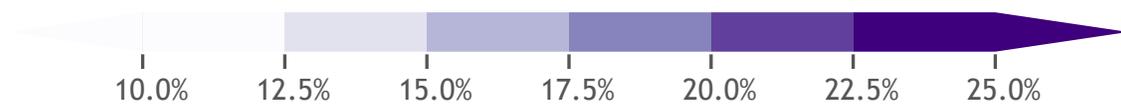
Appendix 3: Potential RHNA Allocation

Map shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details

Option 3: Income Shift 125% - Housing/Jobs Crescent (Baseline: 2050 Households (Blueprint))



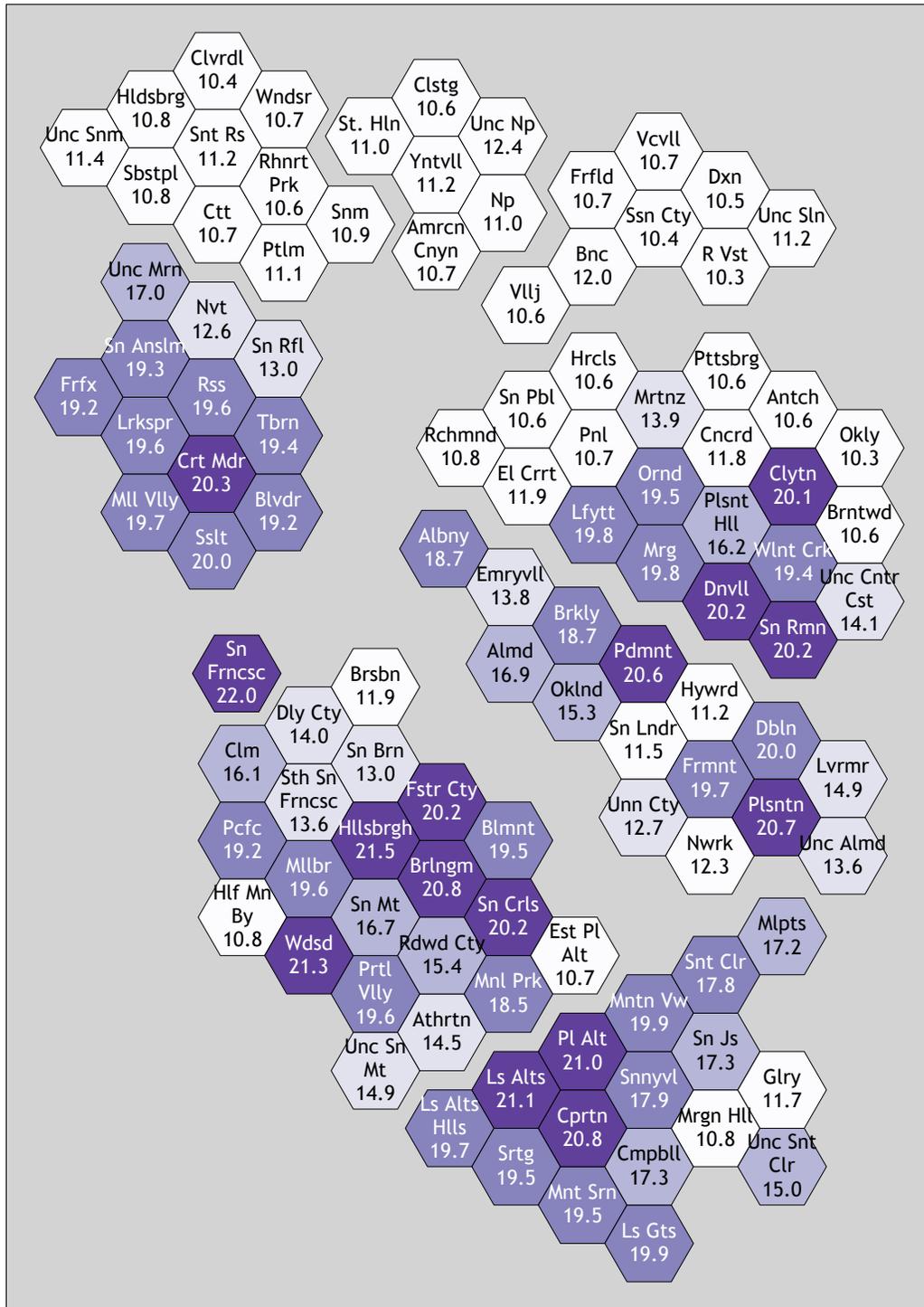
Jurisdiction Growth Rate



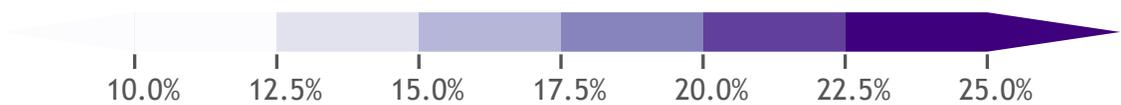
Appendix 3: Potential RHNA Allocation

Map shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details

Option 3: Income Shift 125% - Housing/Jobs Crescent (Baseline: Households 2019)



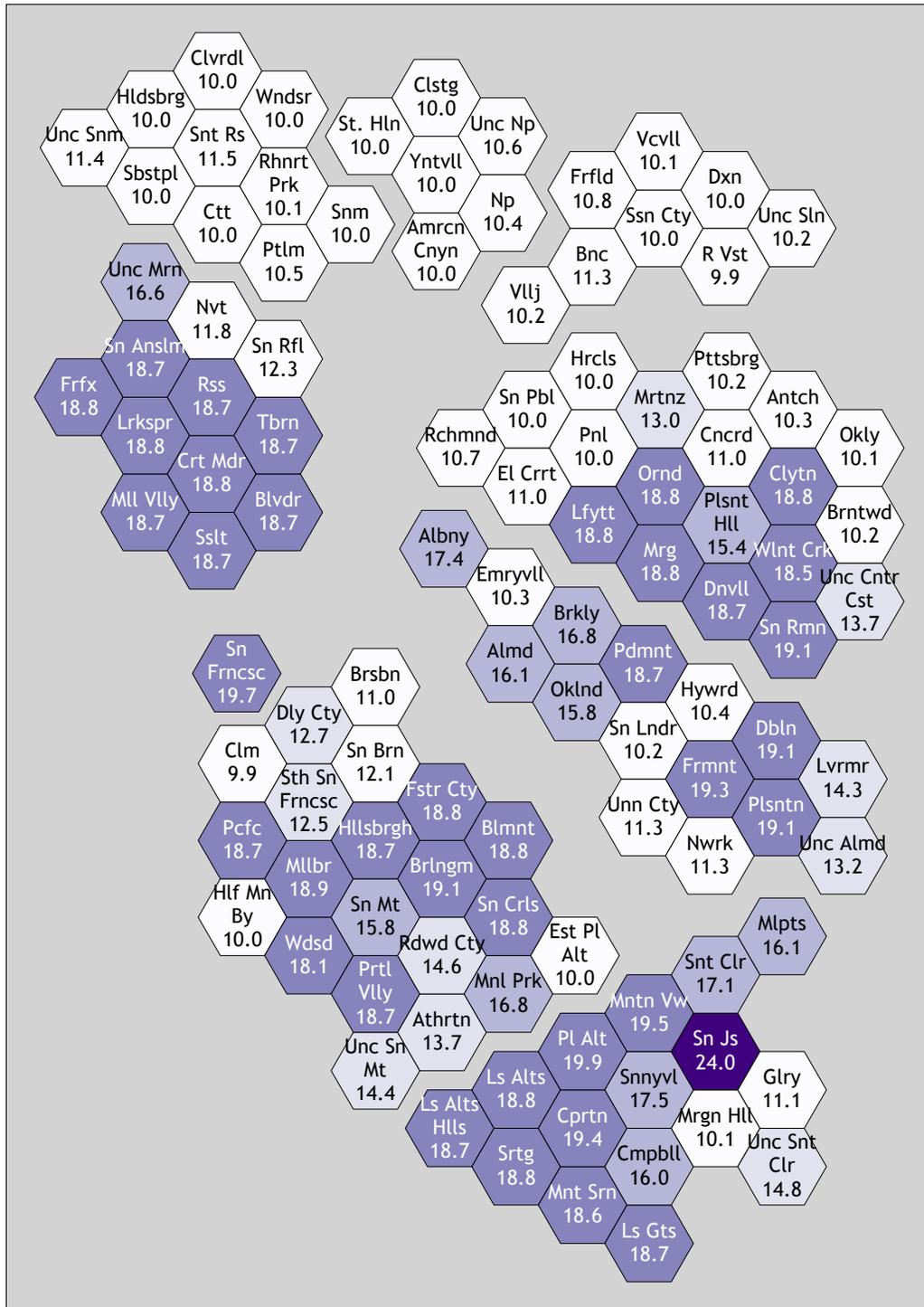
Jurisdiction Growth Rate



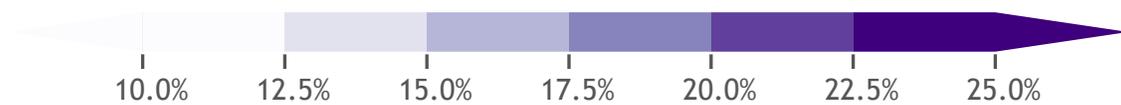
Appendix 3: Potential RHNA Allocation

Map shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details

Option 4: Income Shift 125% - Balanced Blueprint/High Resource Areas (Baseline: Households 2019)

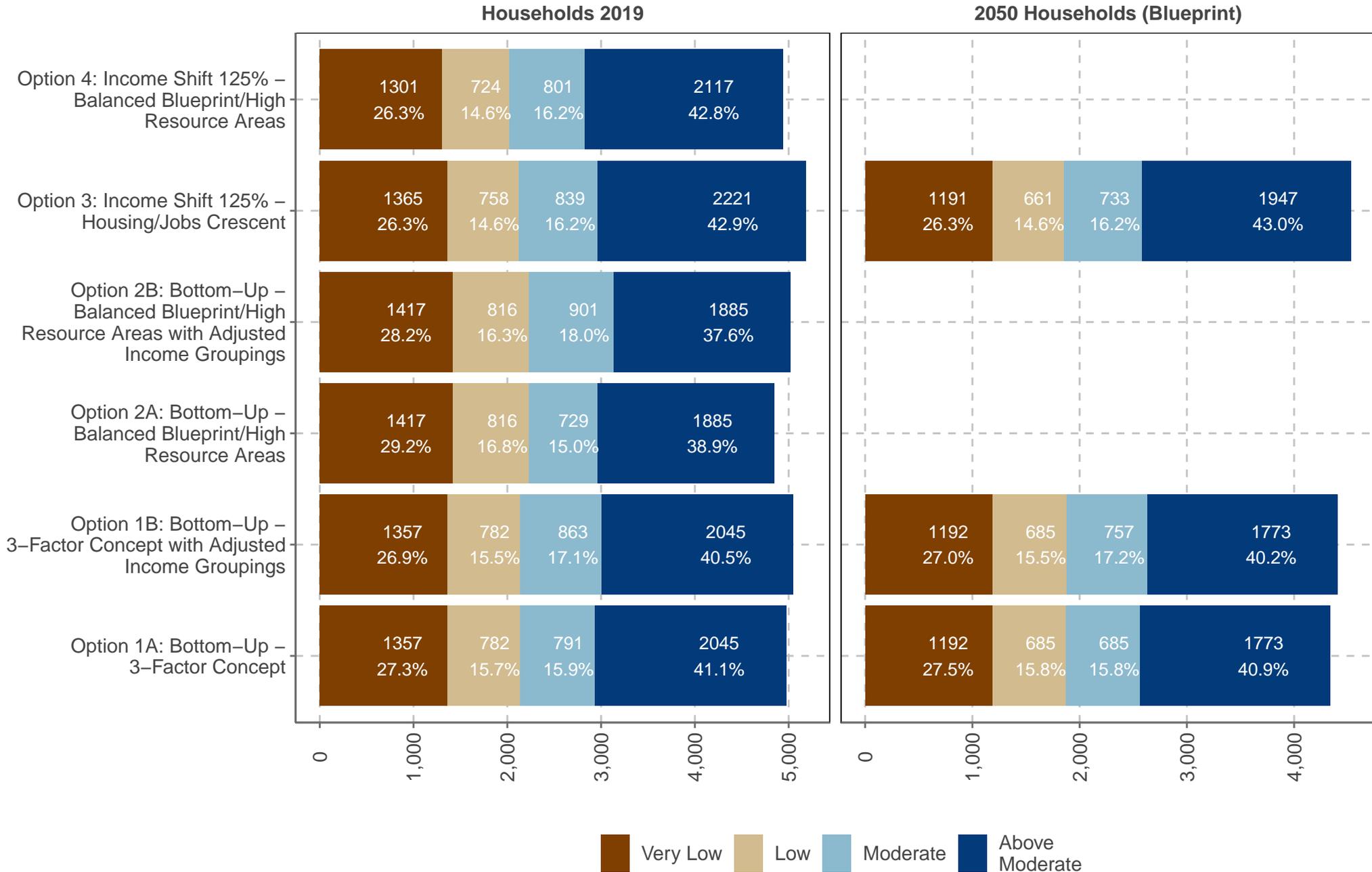


Jurisdiction Growth Rate



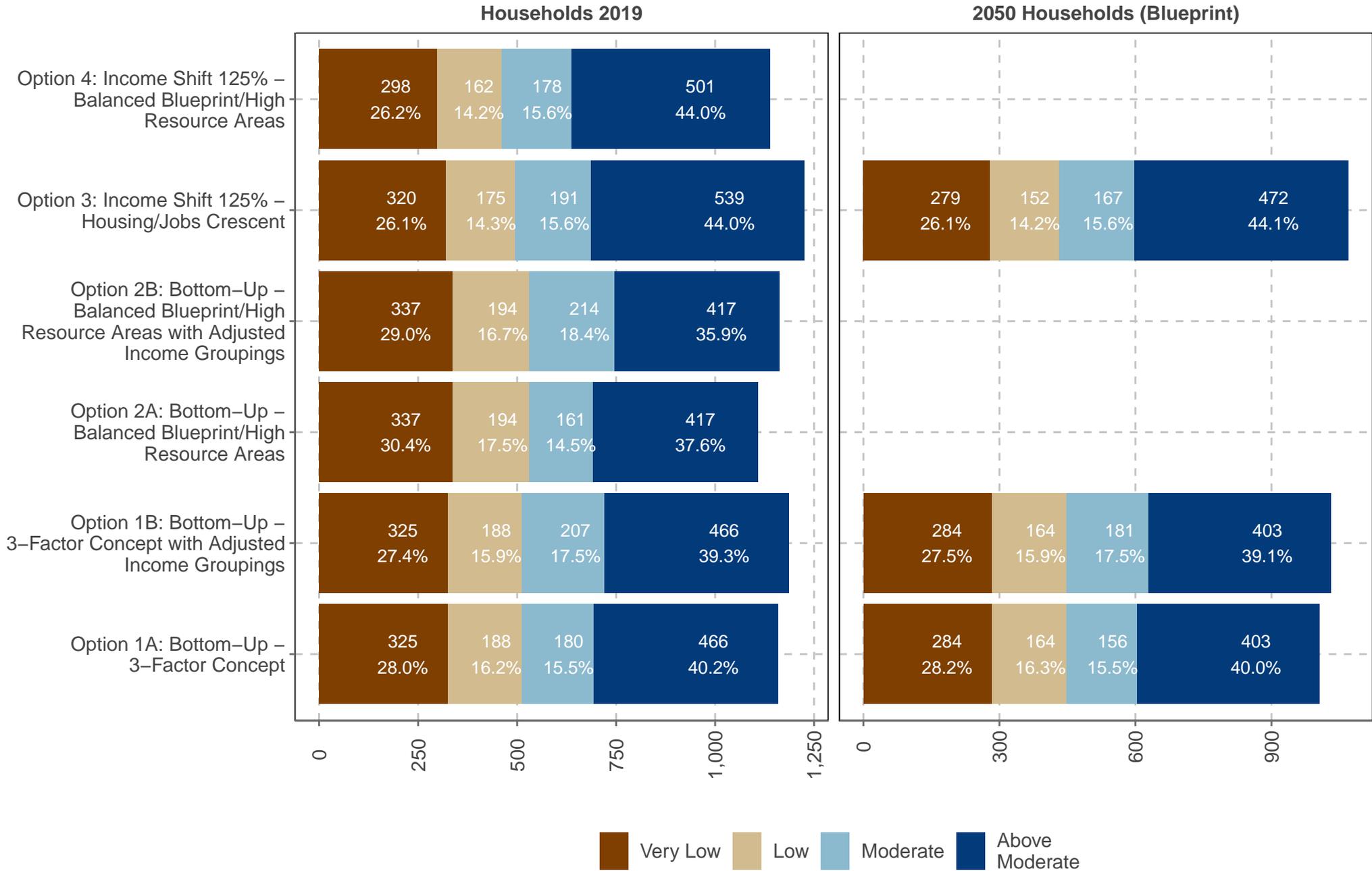
**Appendix 4: Potential RHNA Allocation, Income Distribution
Alameda
(2019 households: 30742)
(Alameda County)**

Map shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details. Label shows allocation rounded to nearest 10.



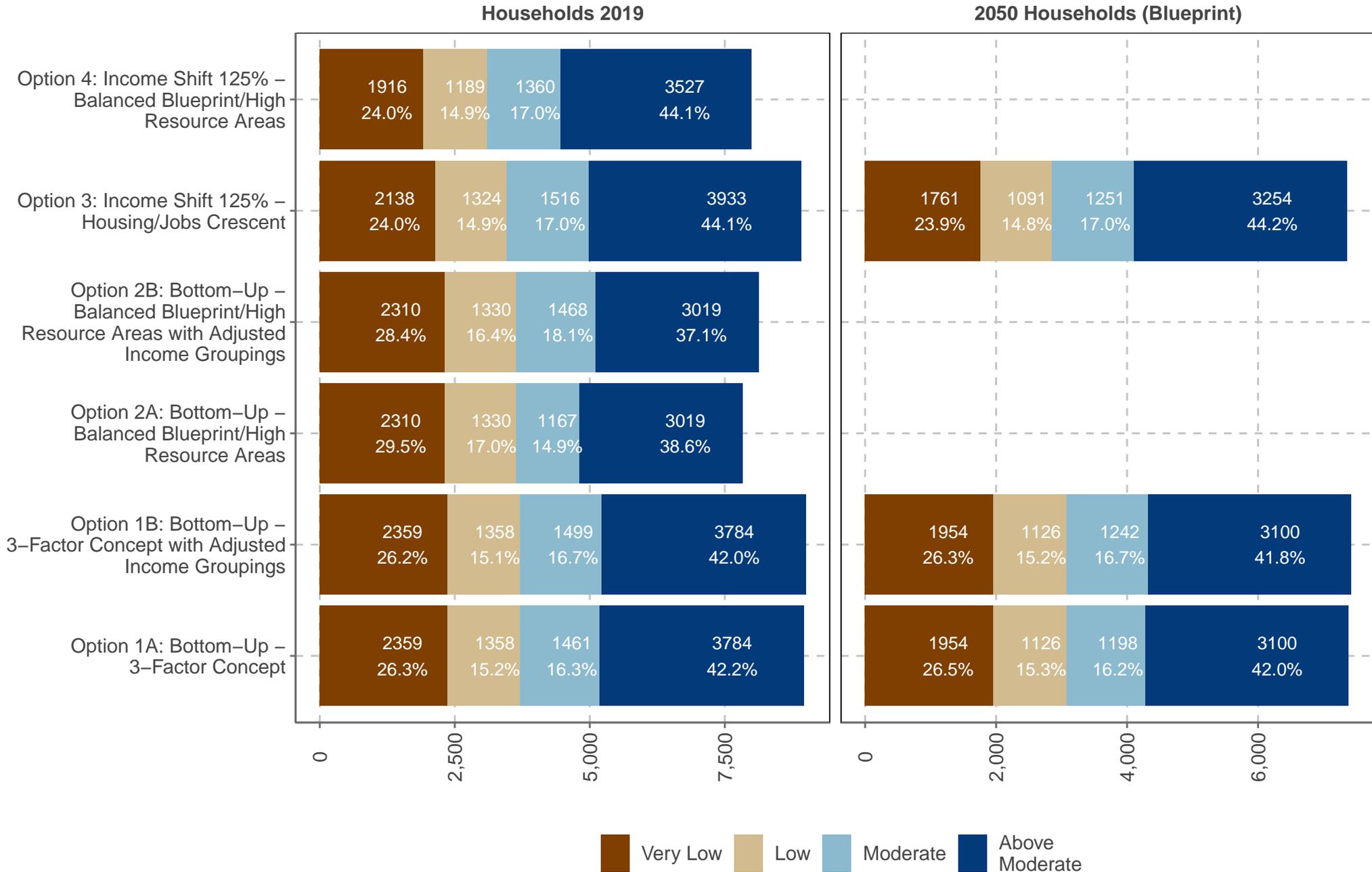
Appendix 4: Potential RHNA Allocation, Income Distribution Albany (2019 households: 6552) (Alameda County)

Map shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details. Label shows allocation rounded to nearest 10.



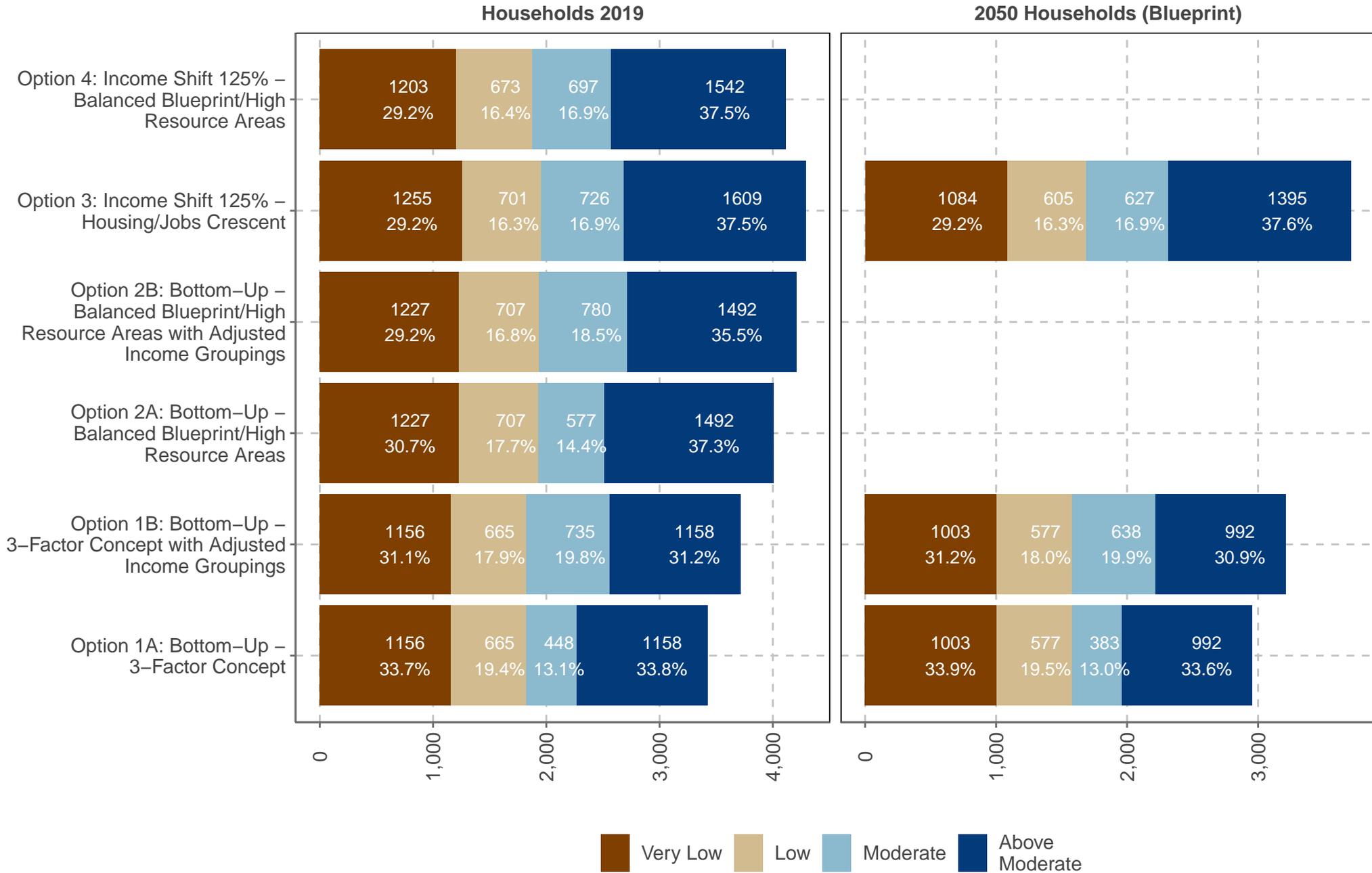
Appendix 4: Potential RHNA Allocation, Income Distribution Berkeley (2019 households: 47604) (Alameda County)

Map shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details.
Label shows allocation rounded to nearest 10.



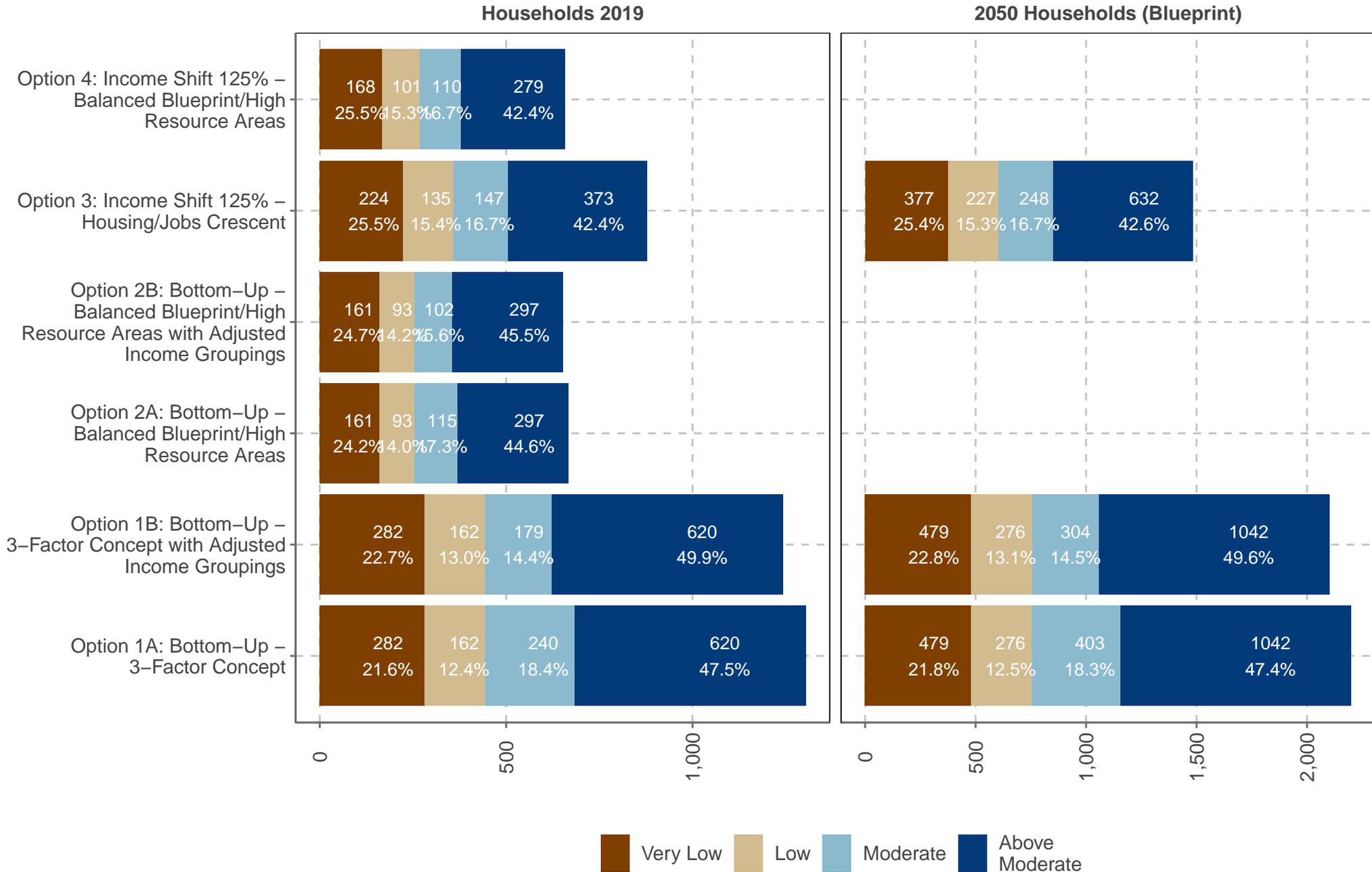
Appendix 4: Potential RHNA Allocation, Income Distribution Dublin (2019 households: 21502) (Alameda County)

Map shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details. Label shows allocation rounded to nearest 10.



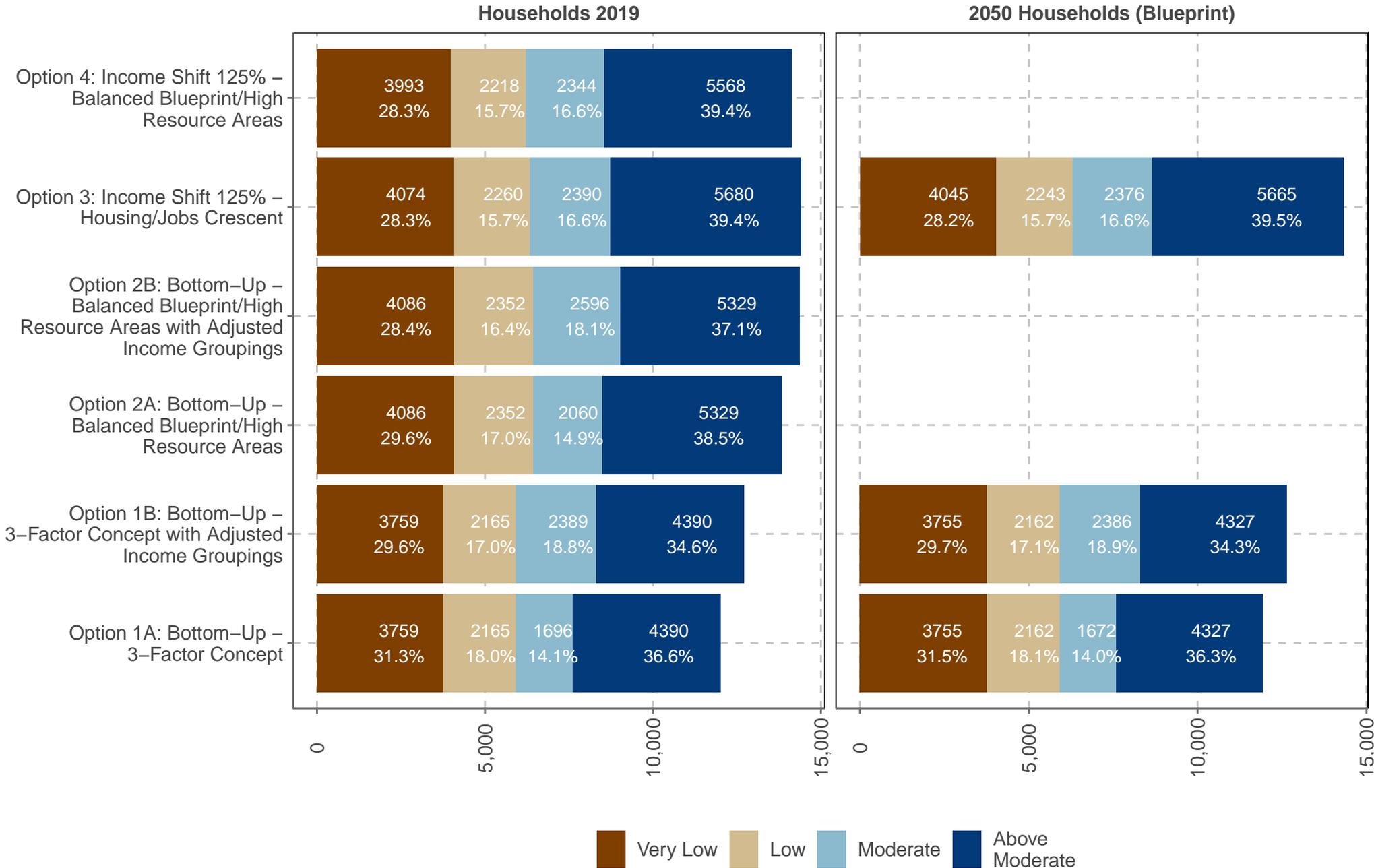
Appendix 4: Potential RHNA Allocation, Income Distribution Emeryville (2019 households: 6381) (Alameda County)

Map shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details. Label shows allocation rounded to nearest 10.



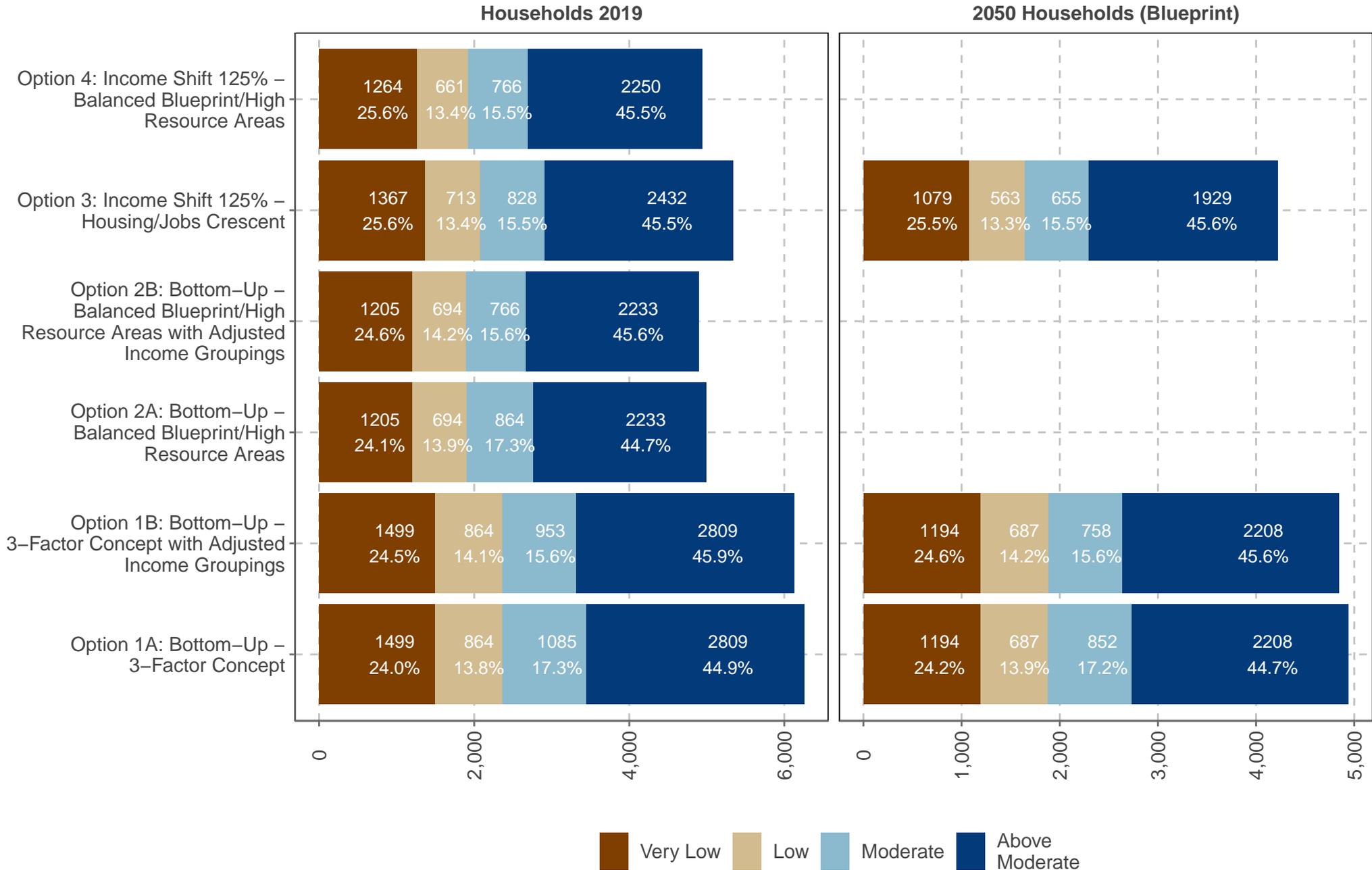
Appendix 4: Potential RHNA Allocation, Income Distribution Fremont (2019 households: 73263) (Alameda County)

Map shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details. Label shows allocation rounded to nearest 10.



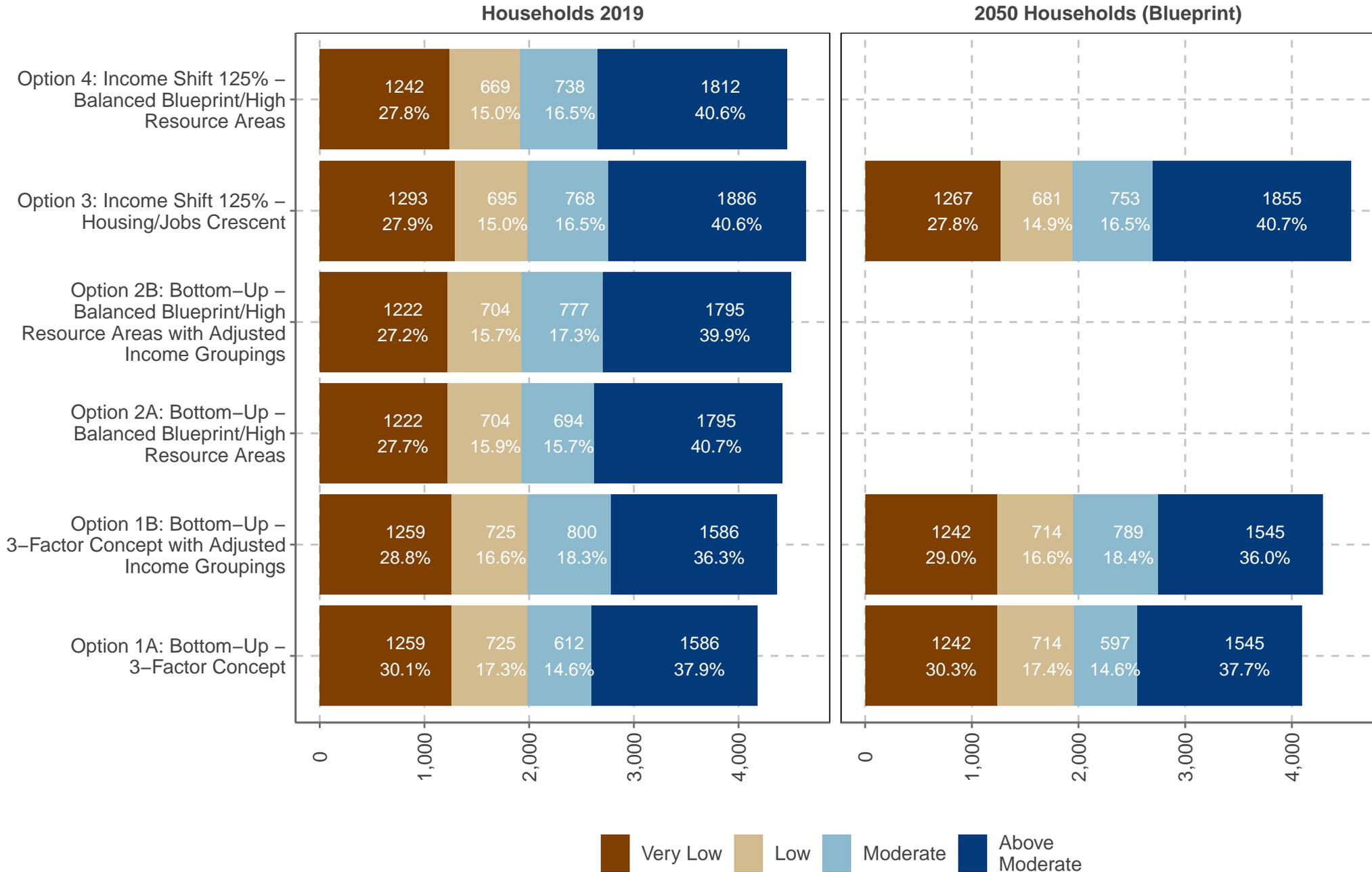
Appendix 4: Potential RHNA Allocation, Income Distribution Hayward (2019 households: 47532) (Alameda County)

Map shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details.
Label shows allocation rounded to nearest 10.



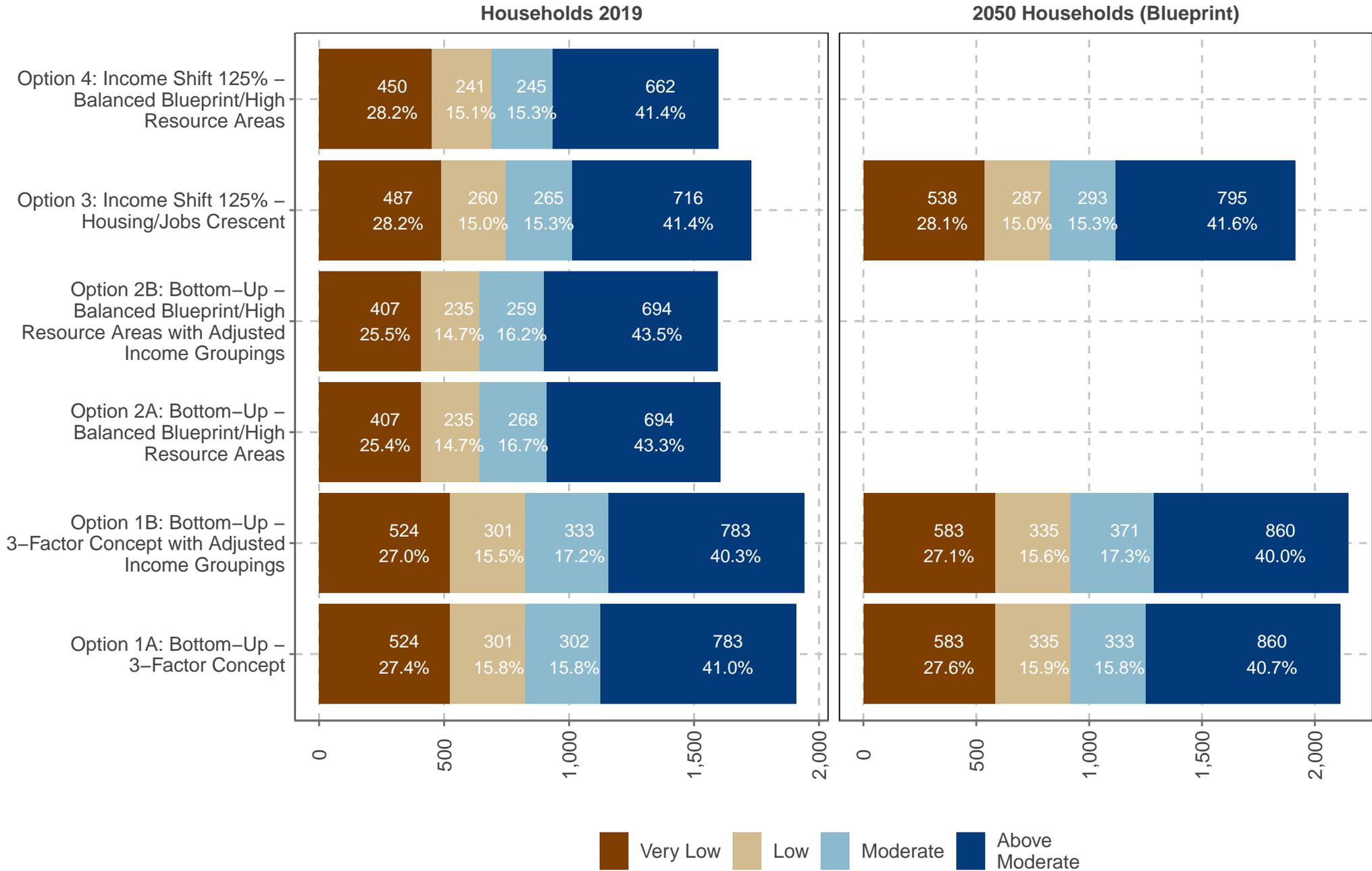
Appendix 4: Potential RHNA Allocation, Income Distribution Livermore (2019 households: 31124) (Alameda County)

Map shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details.
Label shows allocation rounded to nearest 10.



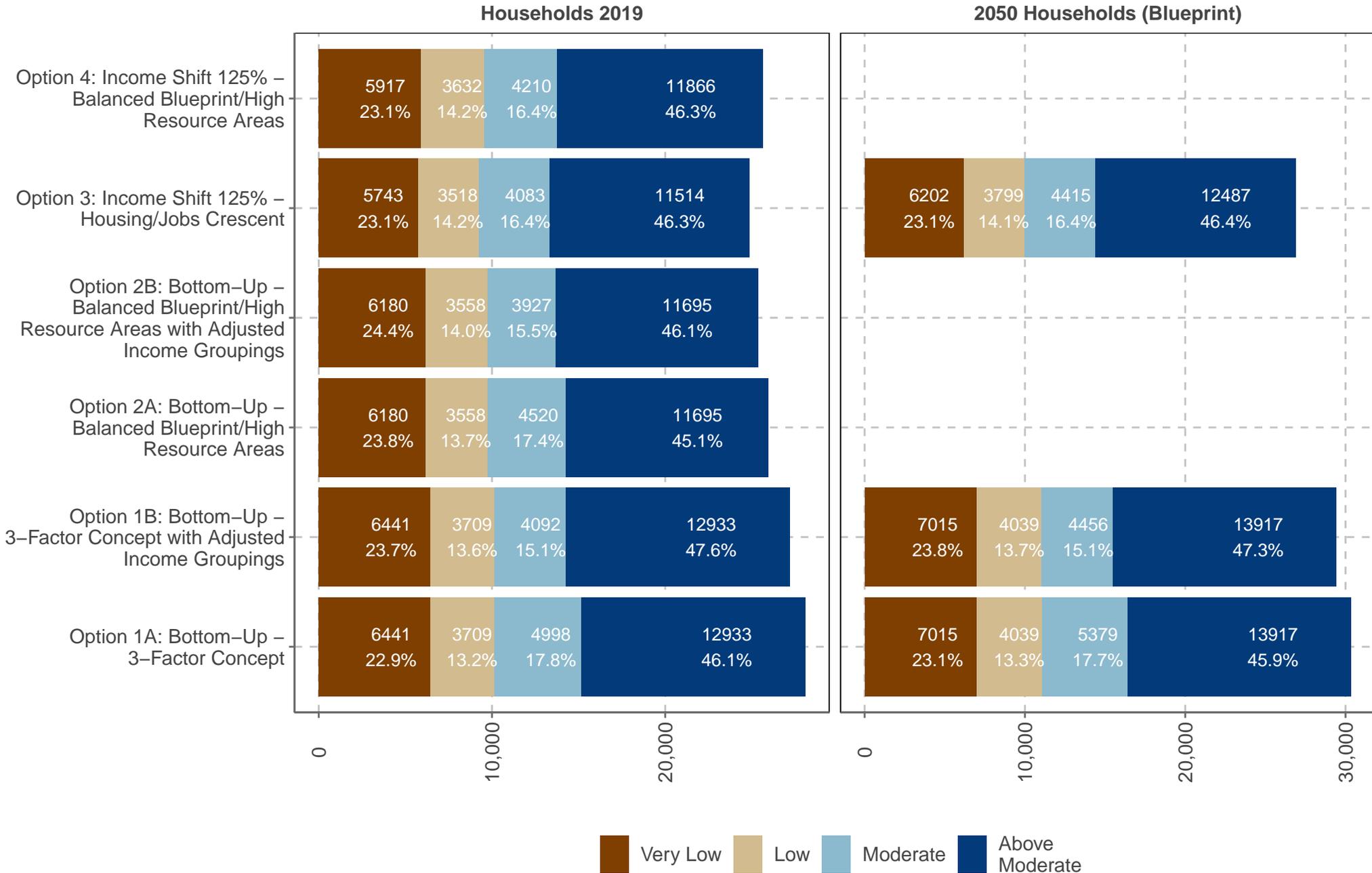
**Appendix 4: Potential RHNA Allocation, Income Distribution
Newark
(2019 households: 14098)
(Alameda County)**

Map shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details. Label shows allocation rounded to nearest 10.



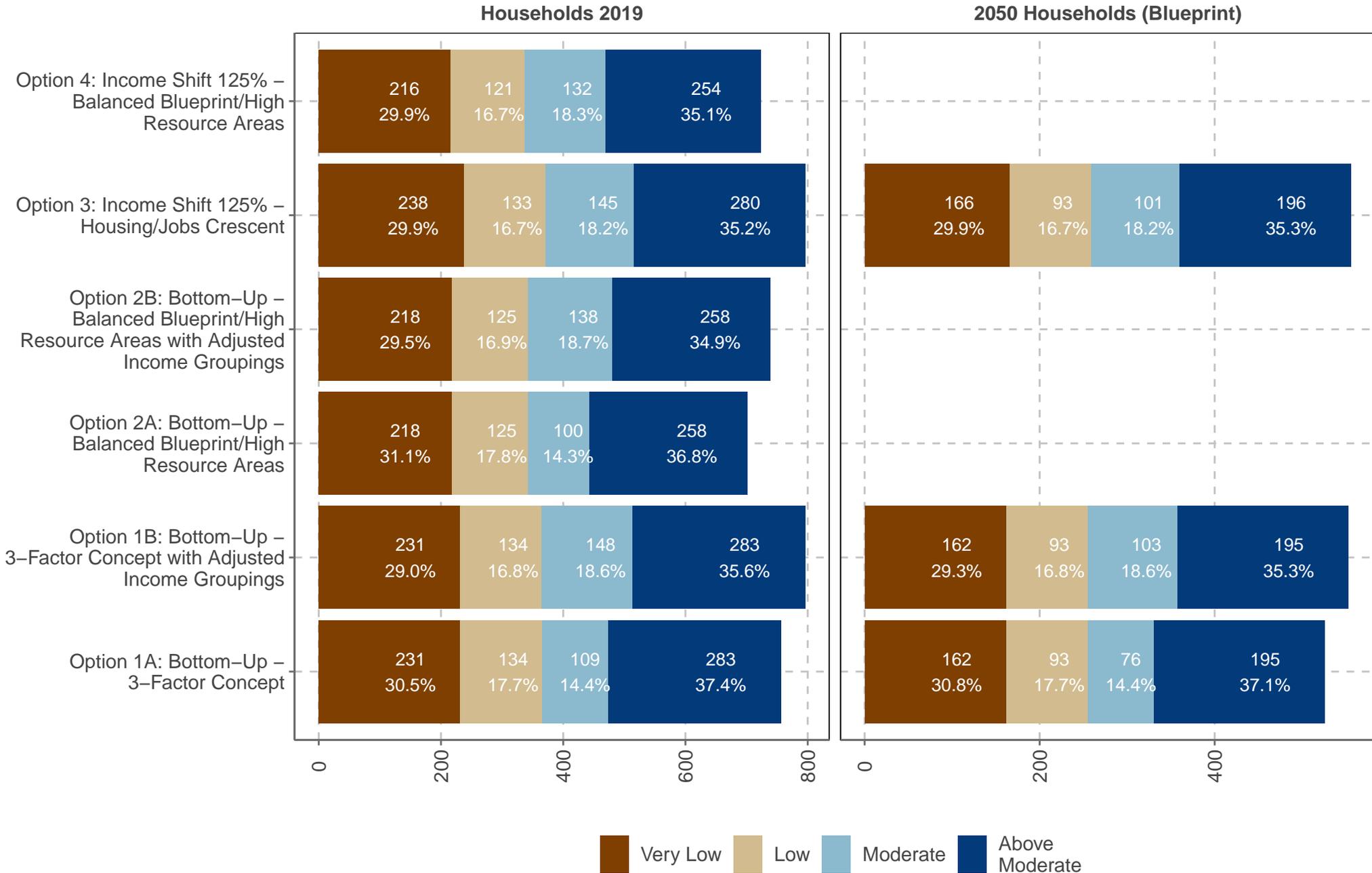
Appendix 4: Potential RHNA Allocation, Income Distribution Oakland (2019 households: 162246) (Alameda County)

Map shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details. Label shows allocation rounded to nearest 10.



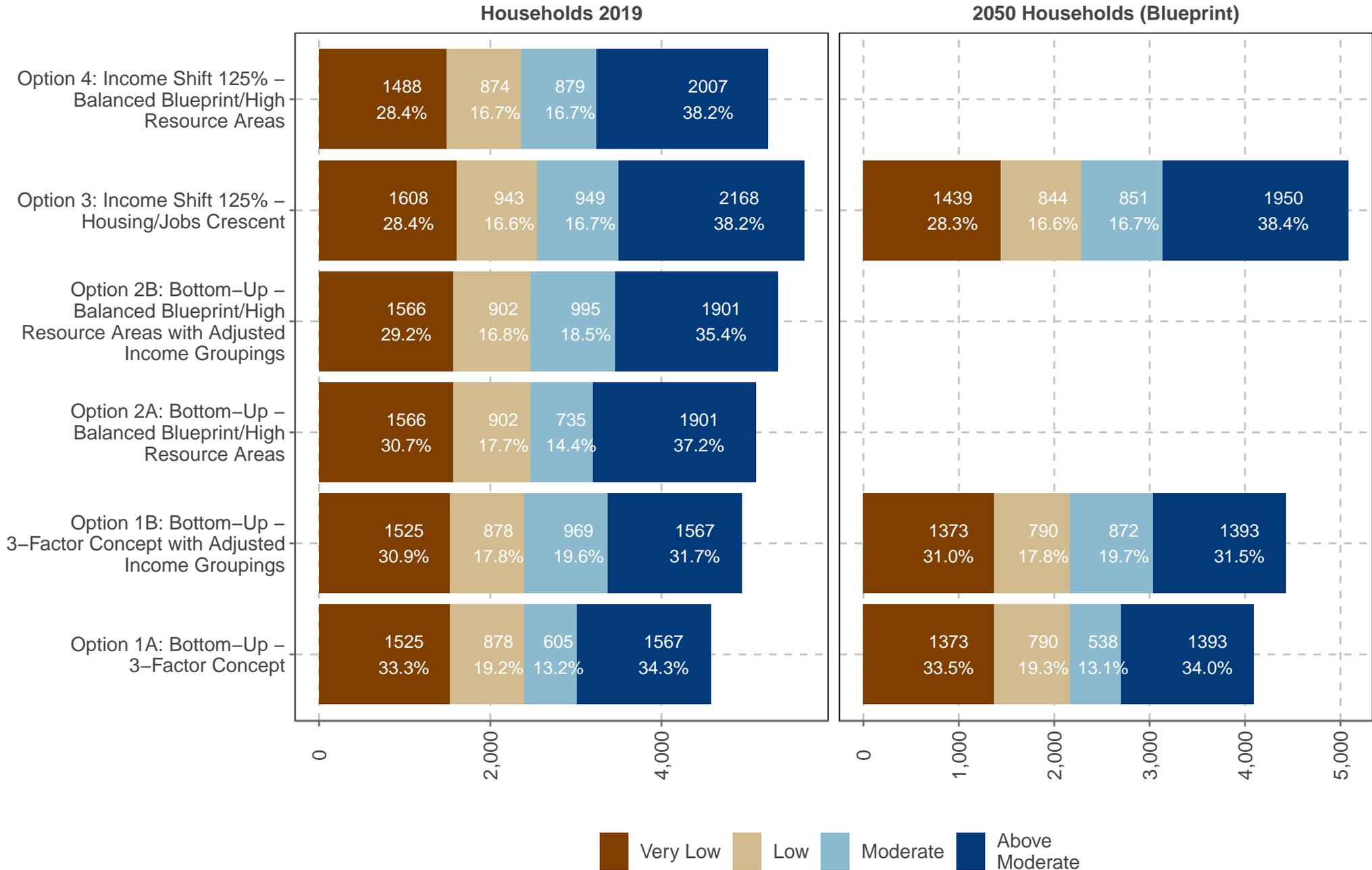
**Appendix 4: Potential RHNA Allocation, Income Distribution
Piedmont
(2019 households: 3863)
(Alameda County)**

Map shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details. Label shows allocation rounded to nearest 10.



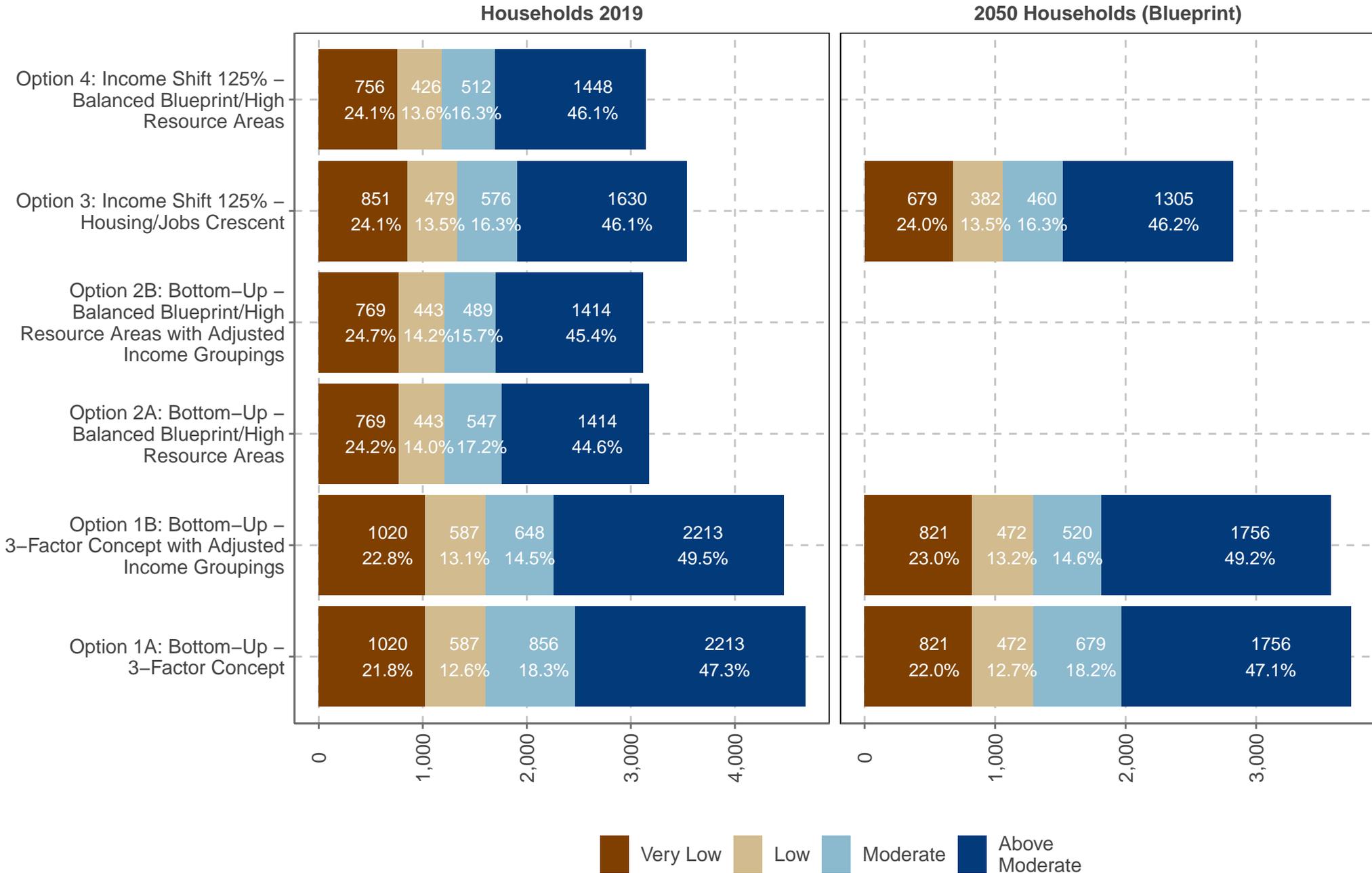
Appendix 4: Potential RHNA Allocation, Income Distribution Pleasanton (2019 households: 27433) (Alameda County)

Map shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details.
Label shows allocation rounded to nearest 10.



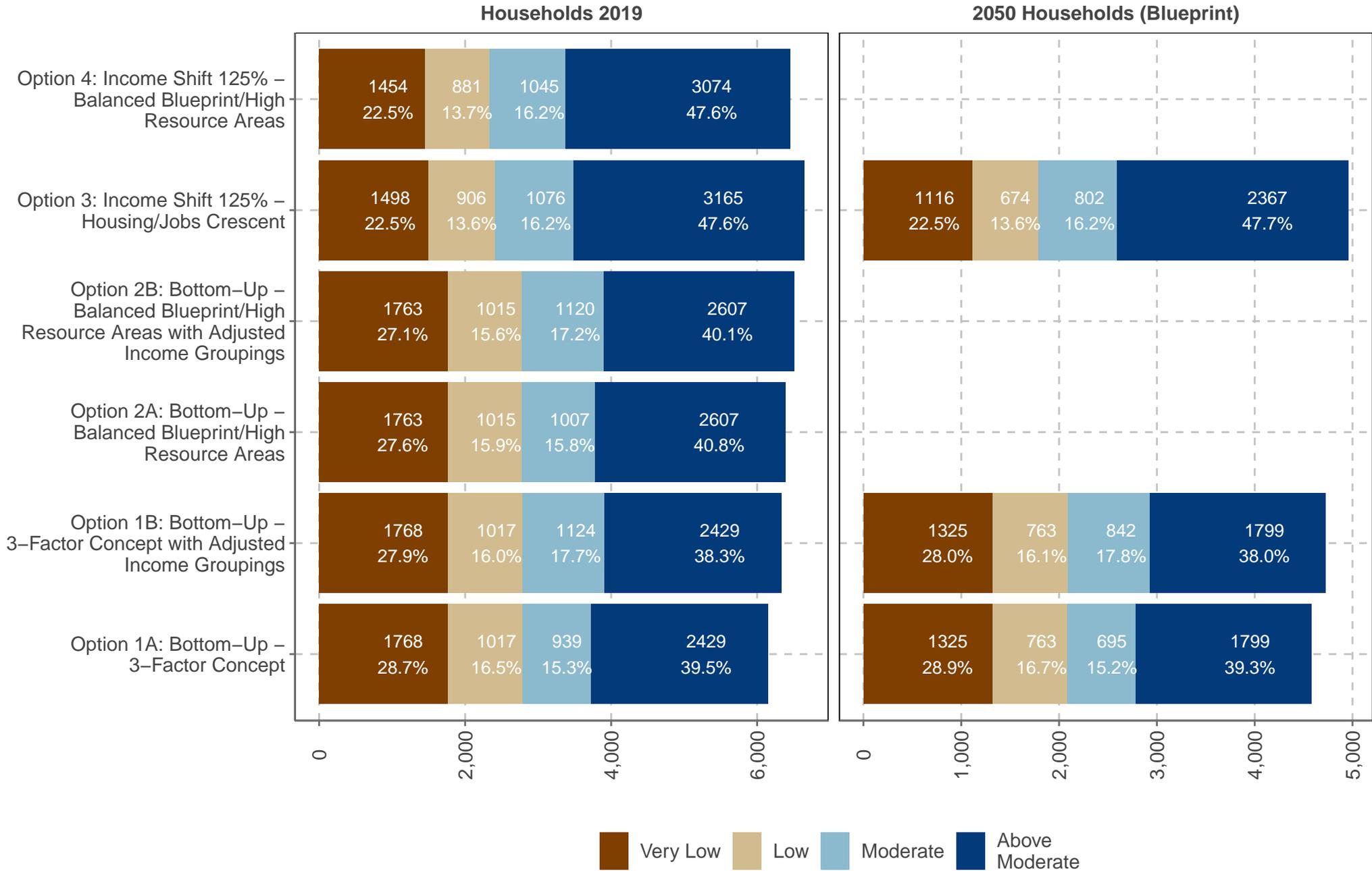
Appendix 4: Potential RHNA Allocation, Income Distribution San Leandro (2019 households: 30851) (Alameda County)

Map shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details. Label shows allocation rounded to nearest 10.



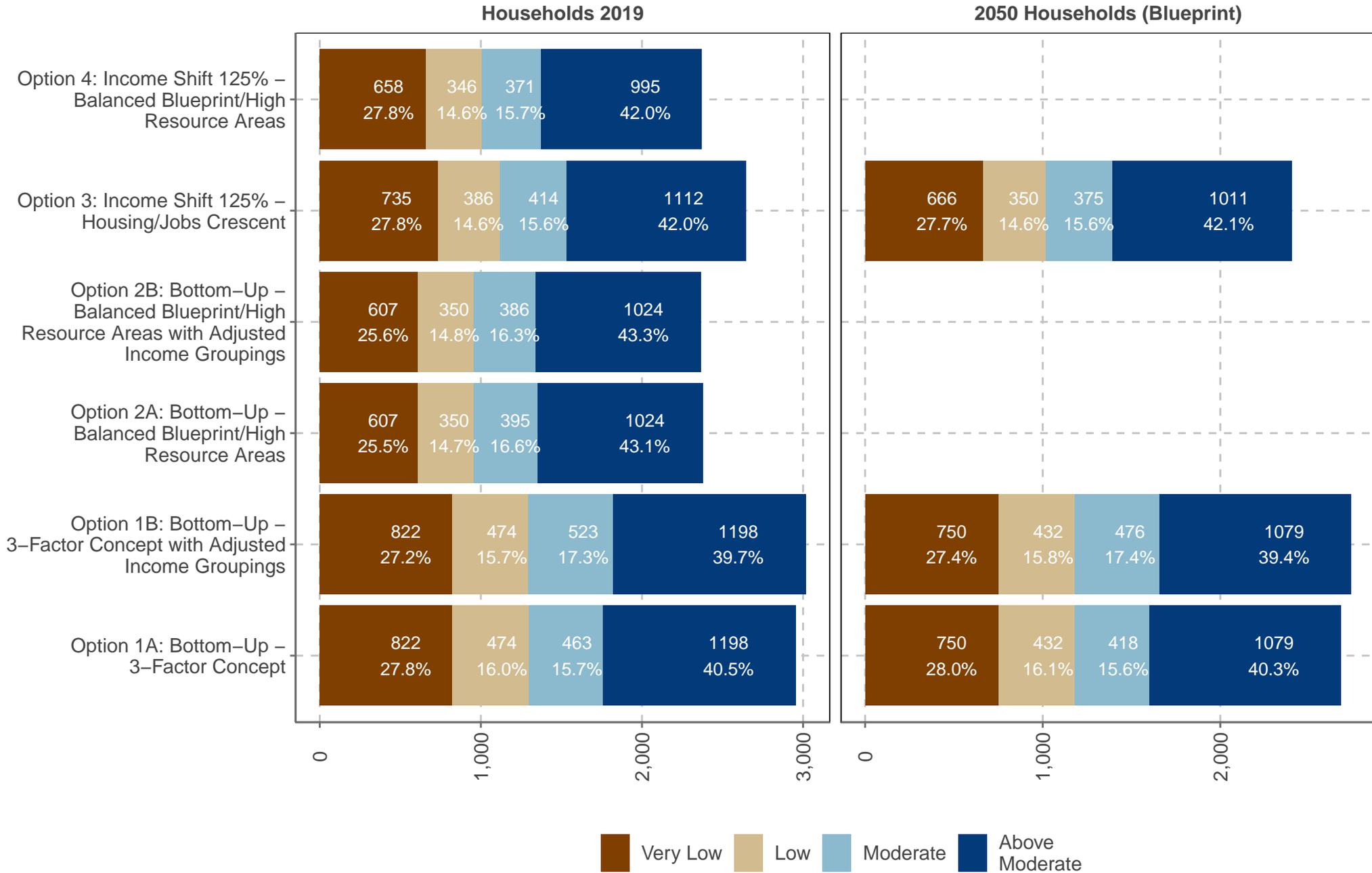
Appendix 4: Potential RHNA Allocation, Income Distribution
Uninc. Alameda
(2019 households: 48810)
(Alameda County)

Map shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details.
 Label shows allocation rounded to nearest 10.



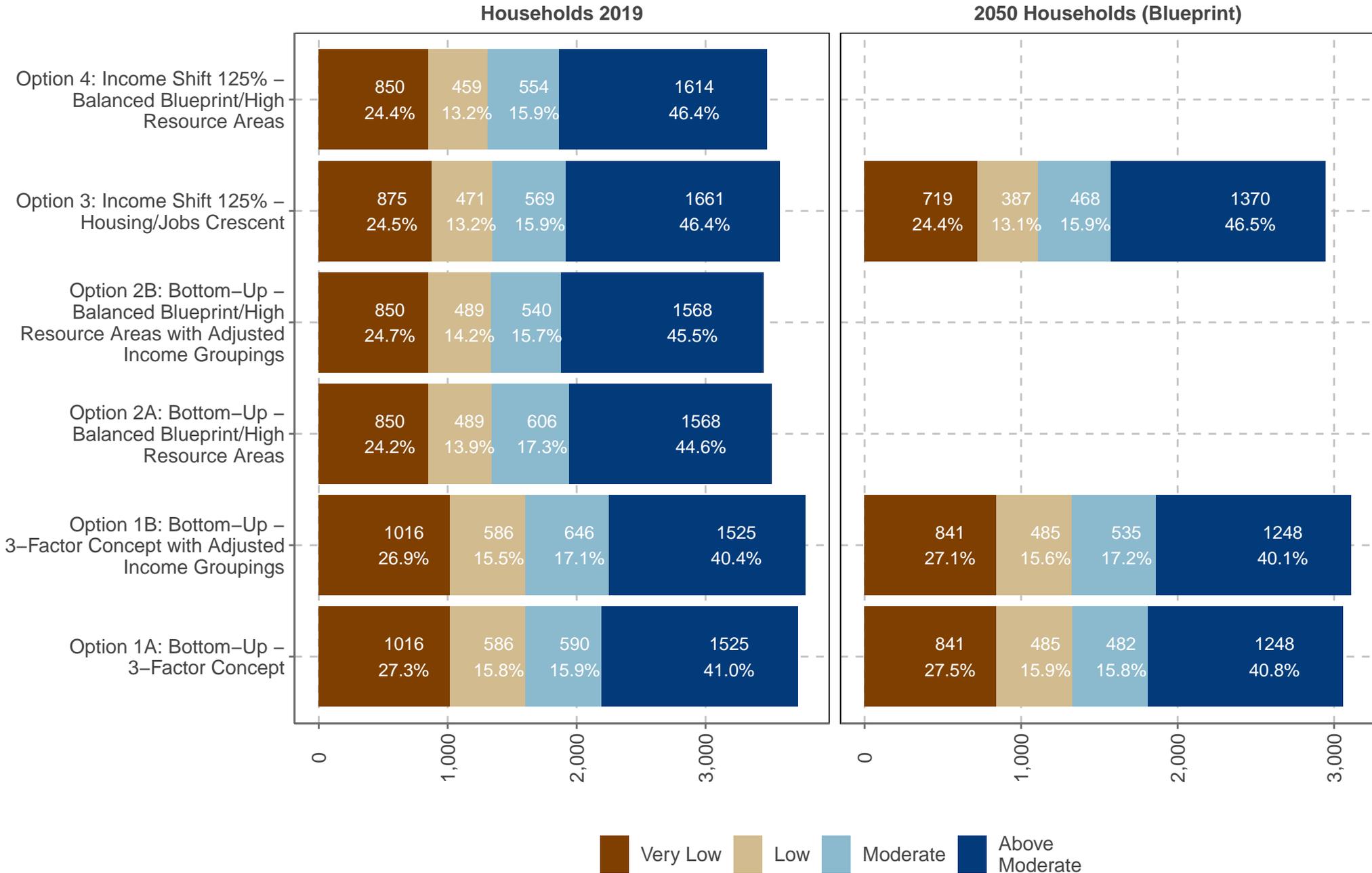
Appendix 4: Potential RHNA Allocation, Income Distribution Union City (2019 households: 20917) (Alameda County)

Map shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details.
Label shows allocation rounded to nearest 10.



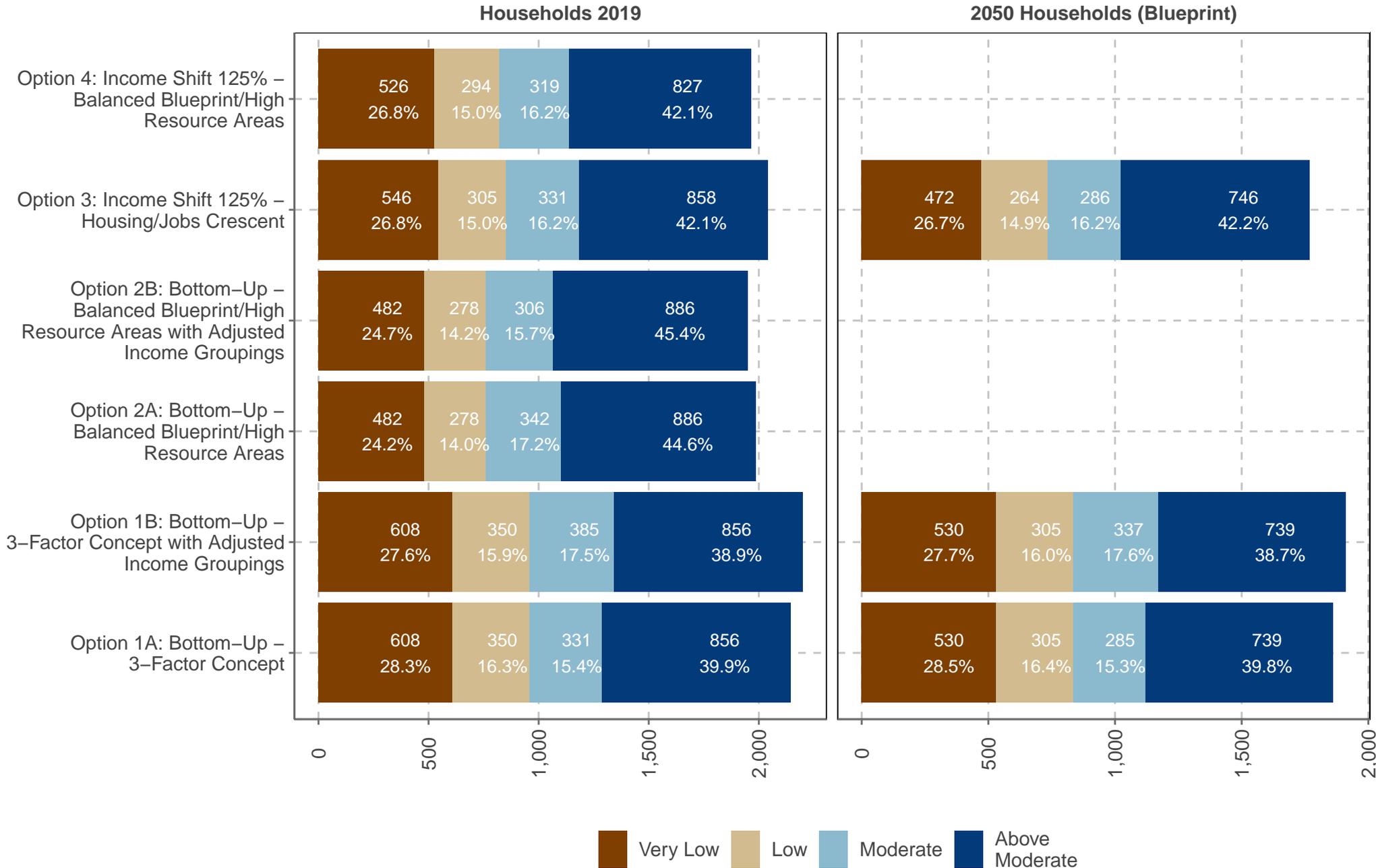
**Appendix 4: Potential RHNA Allocation, Income Distribution
Antioch
(2019 households: 33875)
(Contra Costa County)**

Map shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details.
Label shows allocation rounded to nearest 10.



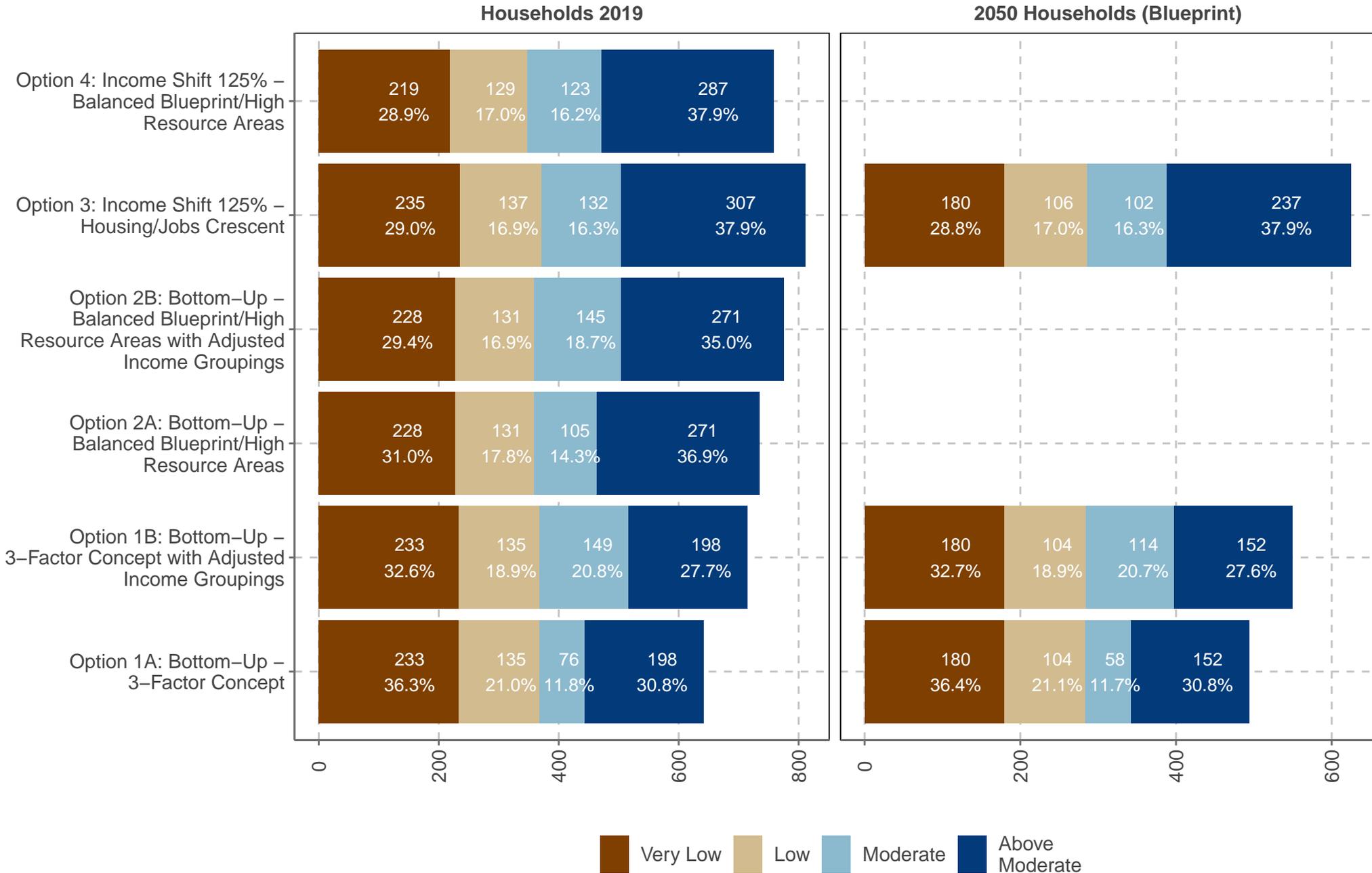
Appendix 4: Potential RHNA Allocation, Income Distribution Brentwood (2019 households: 19252) (Contra Costa County)

Map shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details. Label shows allocation rounded to nearest 10.



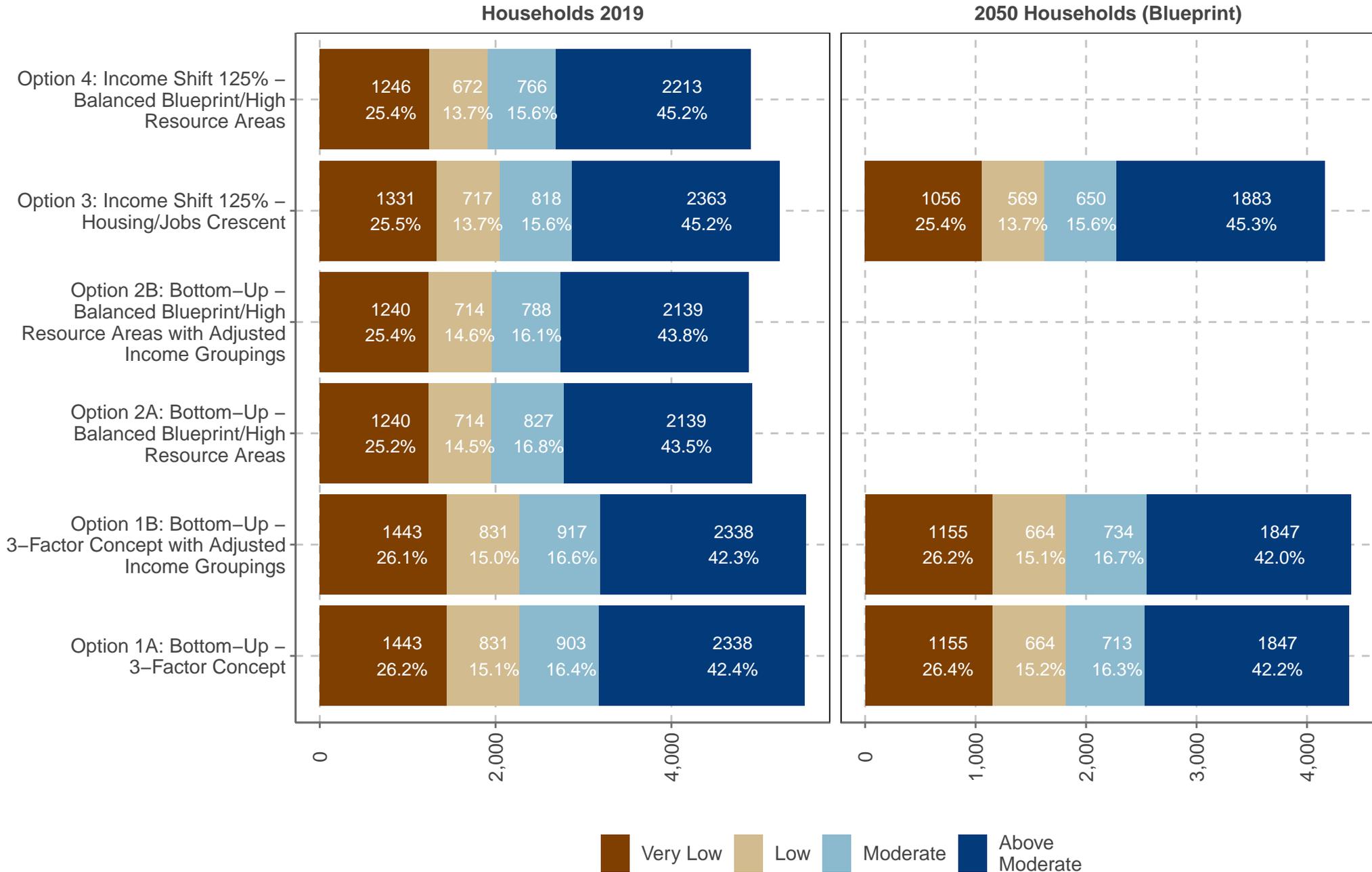
**Appendix 4: Potential RHNA Allocation, Income Distribution
Clayton
(2019 households: 4041)
(Contra Costa County)**

Map shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details. Label shows allocation rounded to nearest 10.



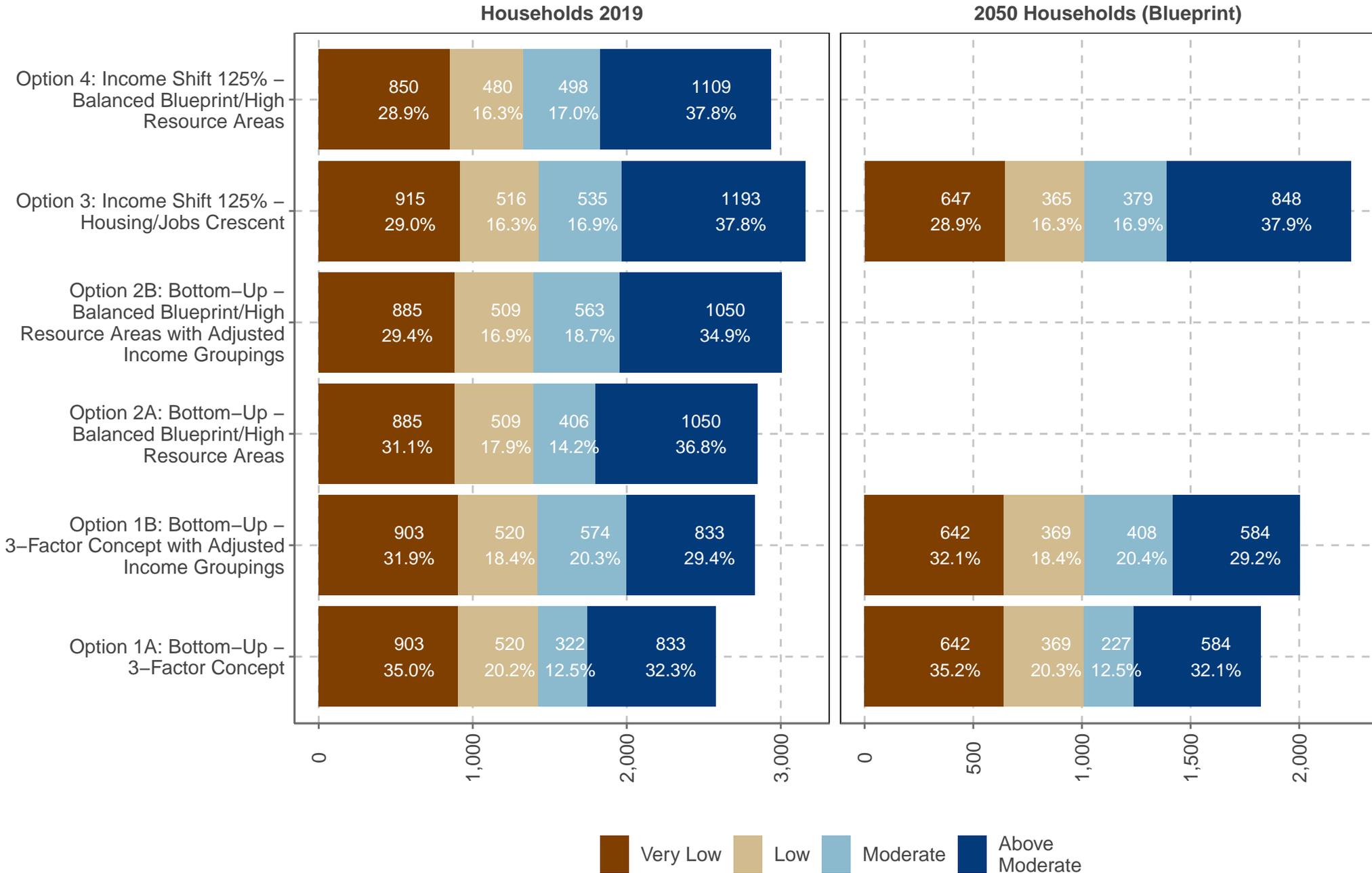
Appendix 4: Potential RHNA Allocation, Income Distribution Concord (2019 households: 44367) (Contra Costa County)

Map shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details. Label shows allocation rounded to nearest 10.



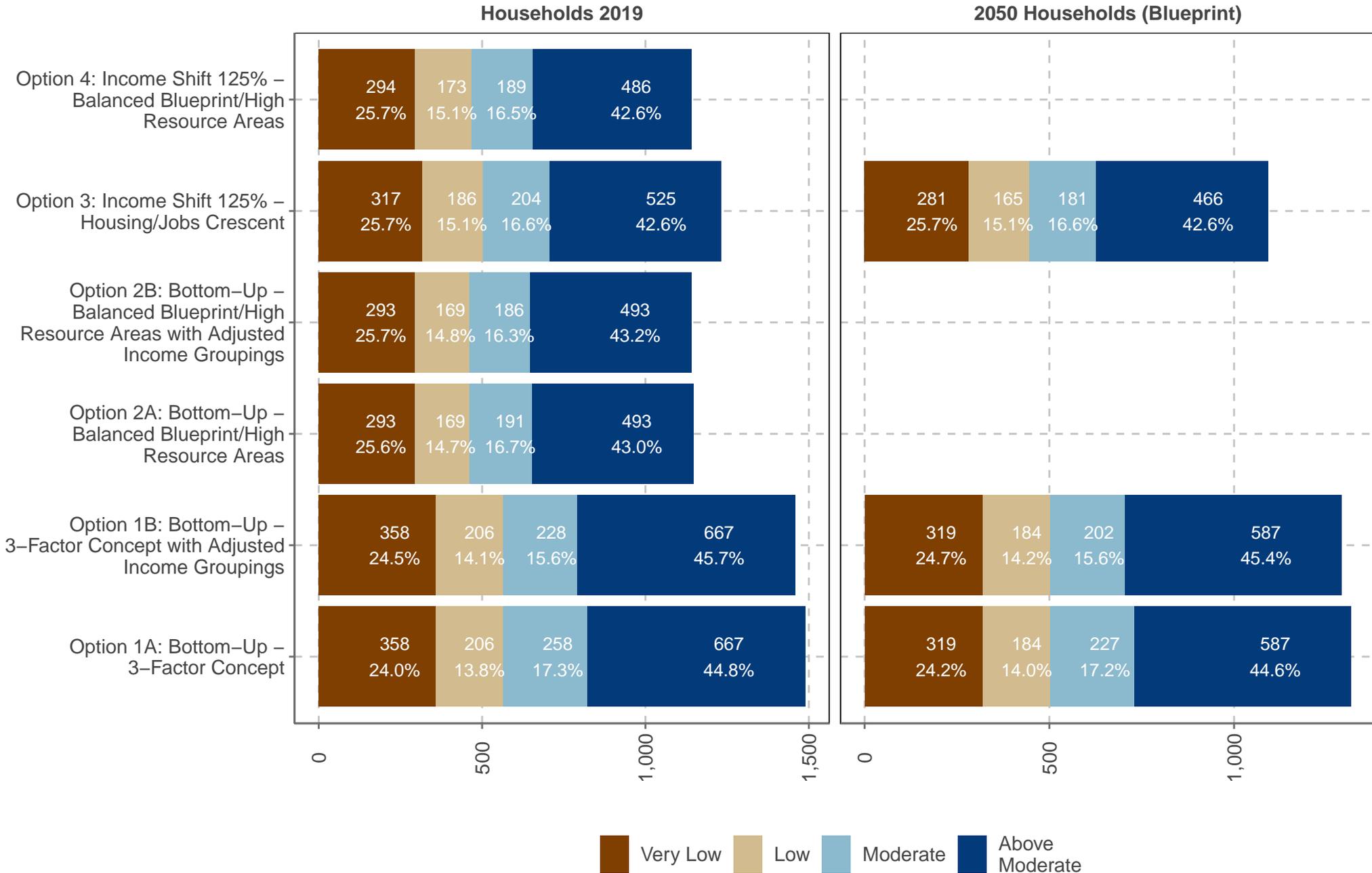
Appendix 4: Potential RHNA Allocation, Income Distribution Danville (2019 households: 15670) (Contra Costa County)

Map shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details. Label shows allocation rounded to nearest 10.



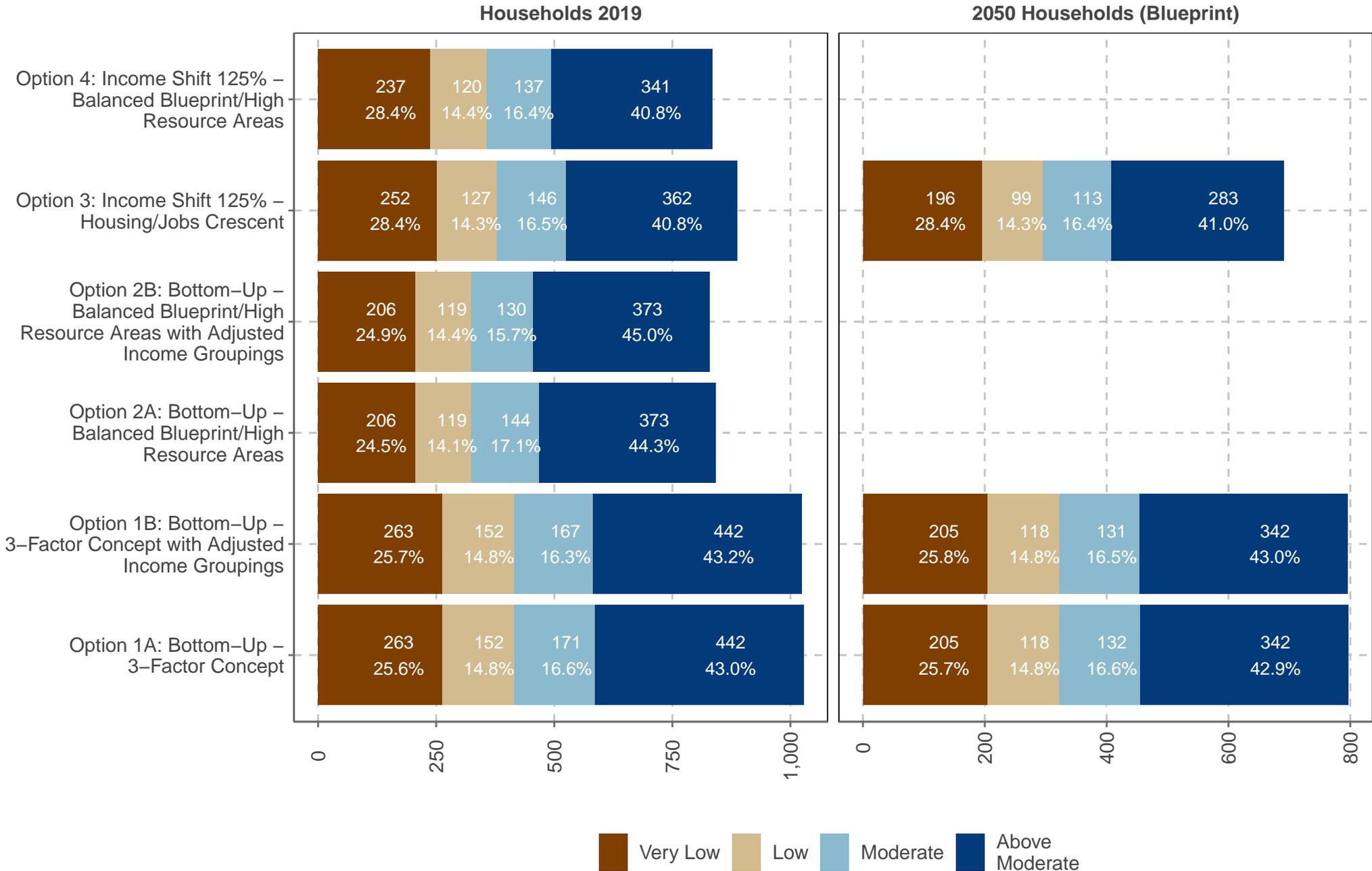
Appendix 4: Potential RHNA Allocation, Income Distribution El Cerrito (2019 households: 10346) (Contra Costa County)

Map shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details. Label shows allocation rounded to nearest 10.



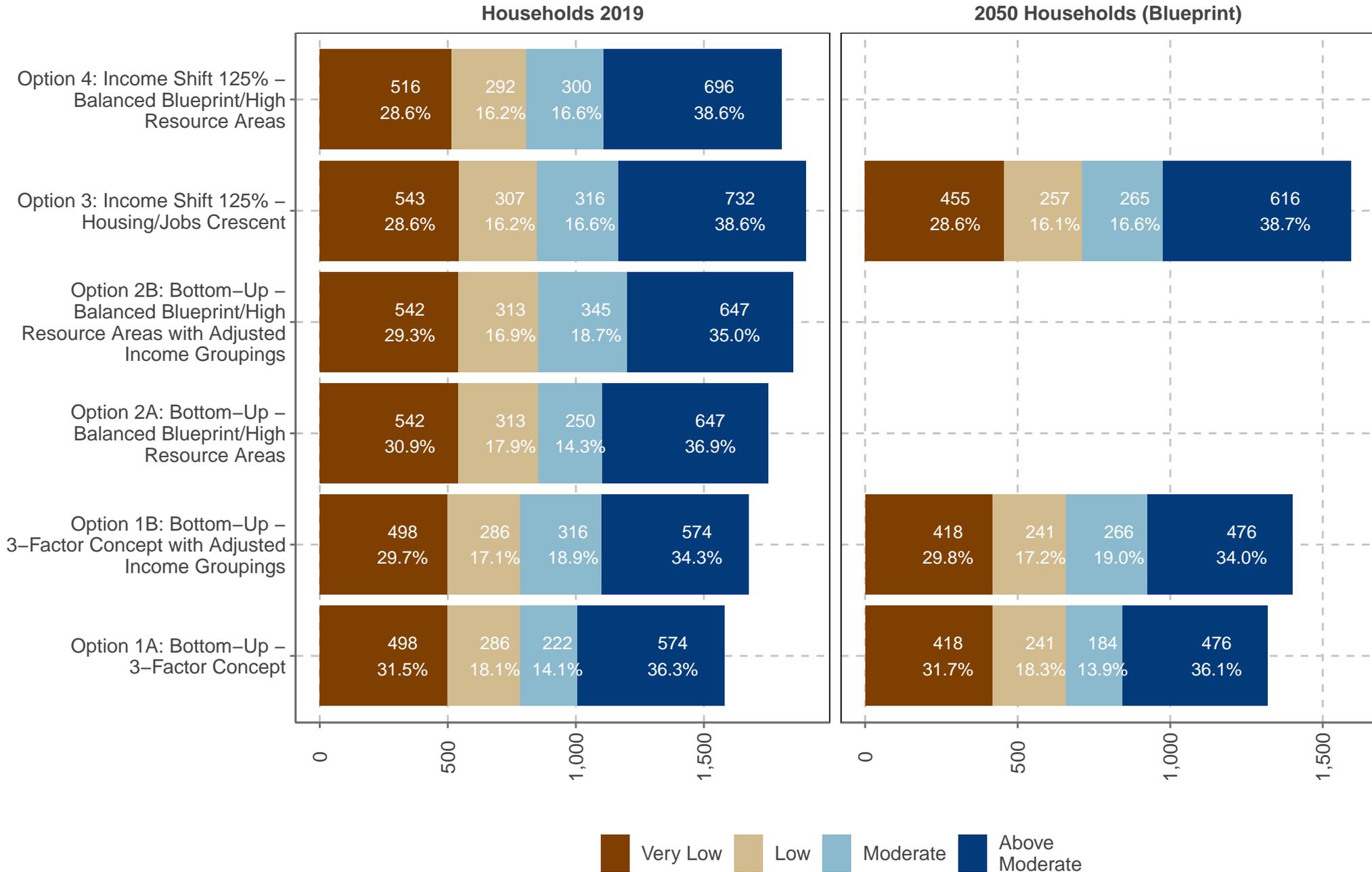
**Appendix 4: Potential RHNA Allocation, Income Distribution
Hercules
(2019 households: 8347)
(Contra Costa County)**

Map shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details. Label shows allocation rounded to nearest 10.



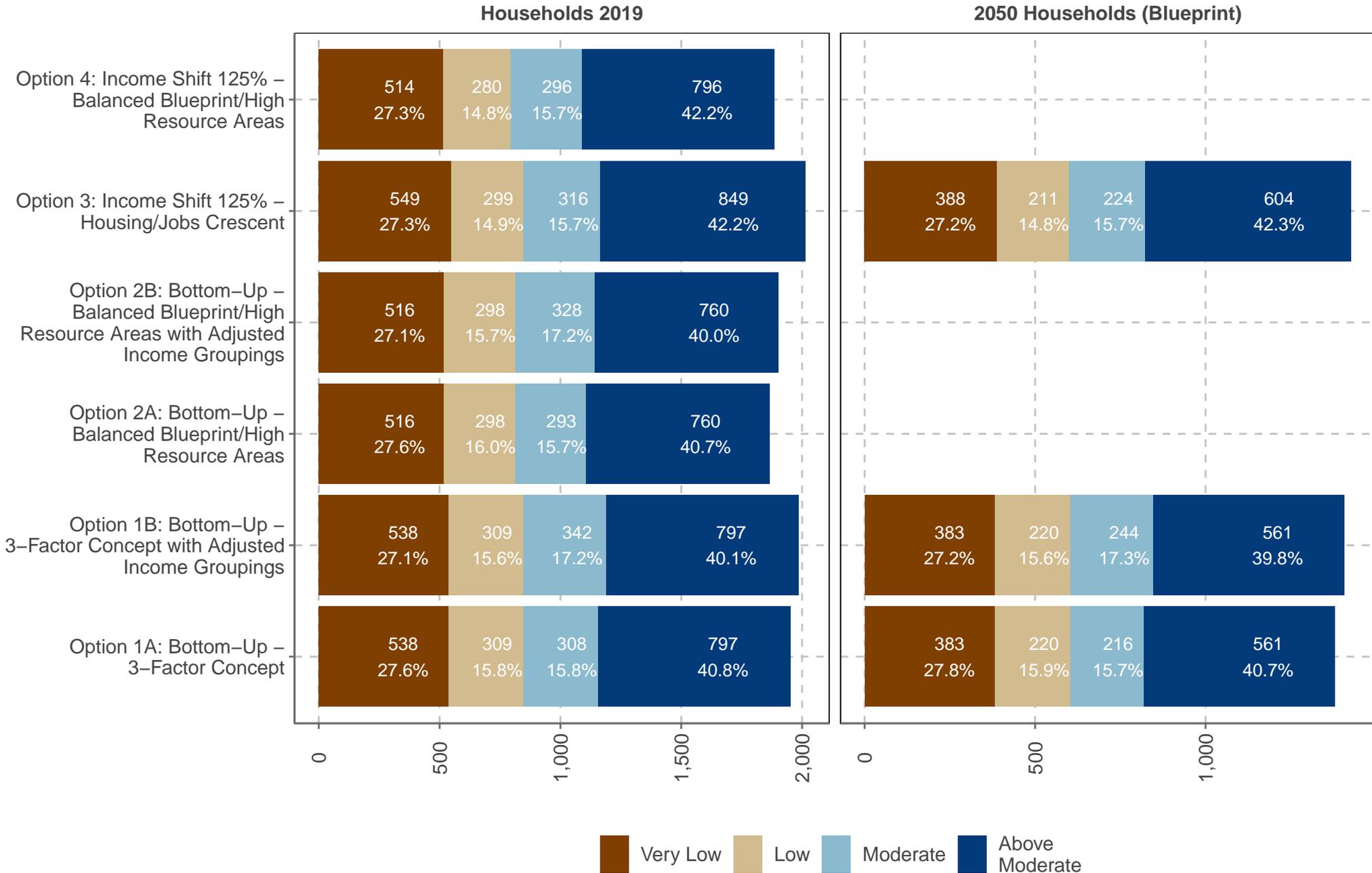
Appendix 4: Potential RHNA Allocation, Income Distribution Lafayette (2019 households: 9591) (Contra Costa County)

Map shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details. Label shows allocation rounded to nearest 10.



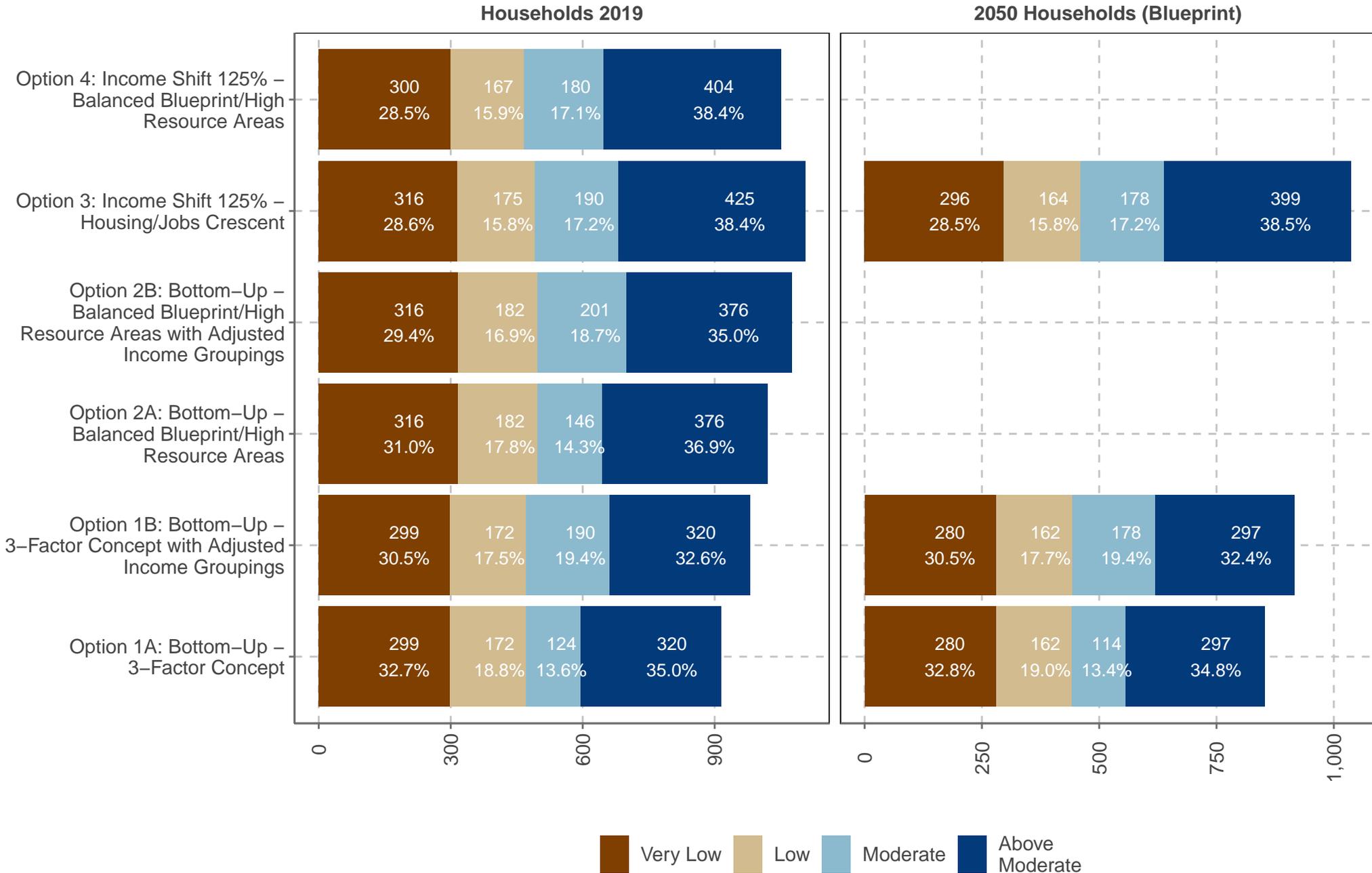
Appendix 4: Potential RHNA Allocation, Income Distribution Martinez (2019 households: 14522) (Contra Costa County)

Map shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details. Label shows allocation rounded to nearest 10.



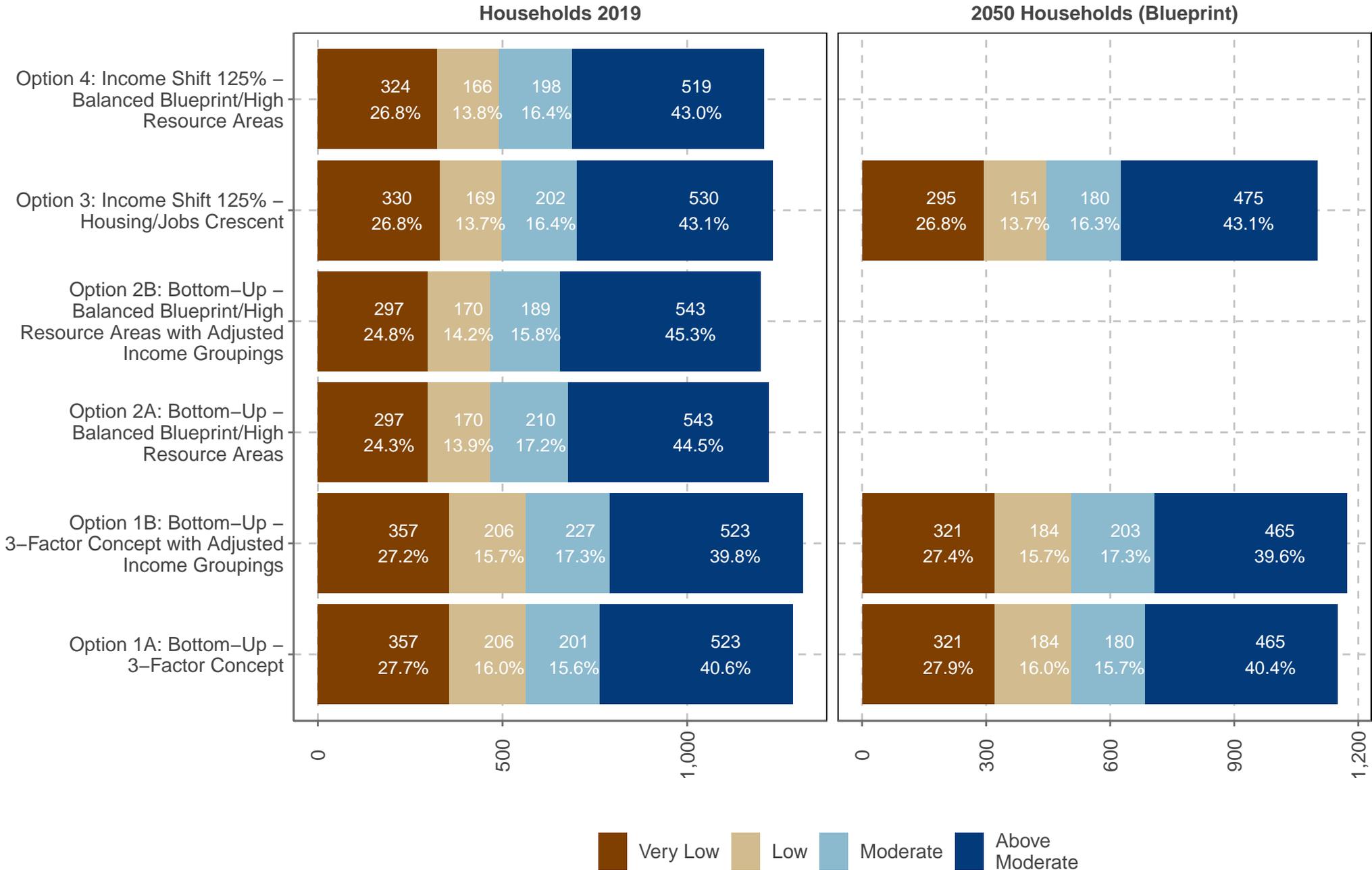
Appendix 4: Potential RHNA Allocation, Income Distribution Moraga (2019 households: 5594) (Contra Costa County)

Map shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details. Label shows allocation rounded to nearest 10.



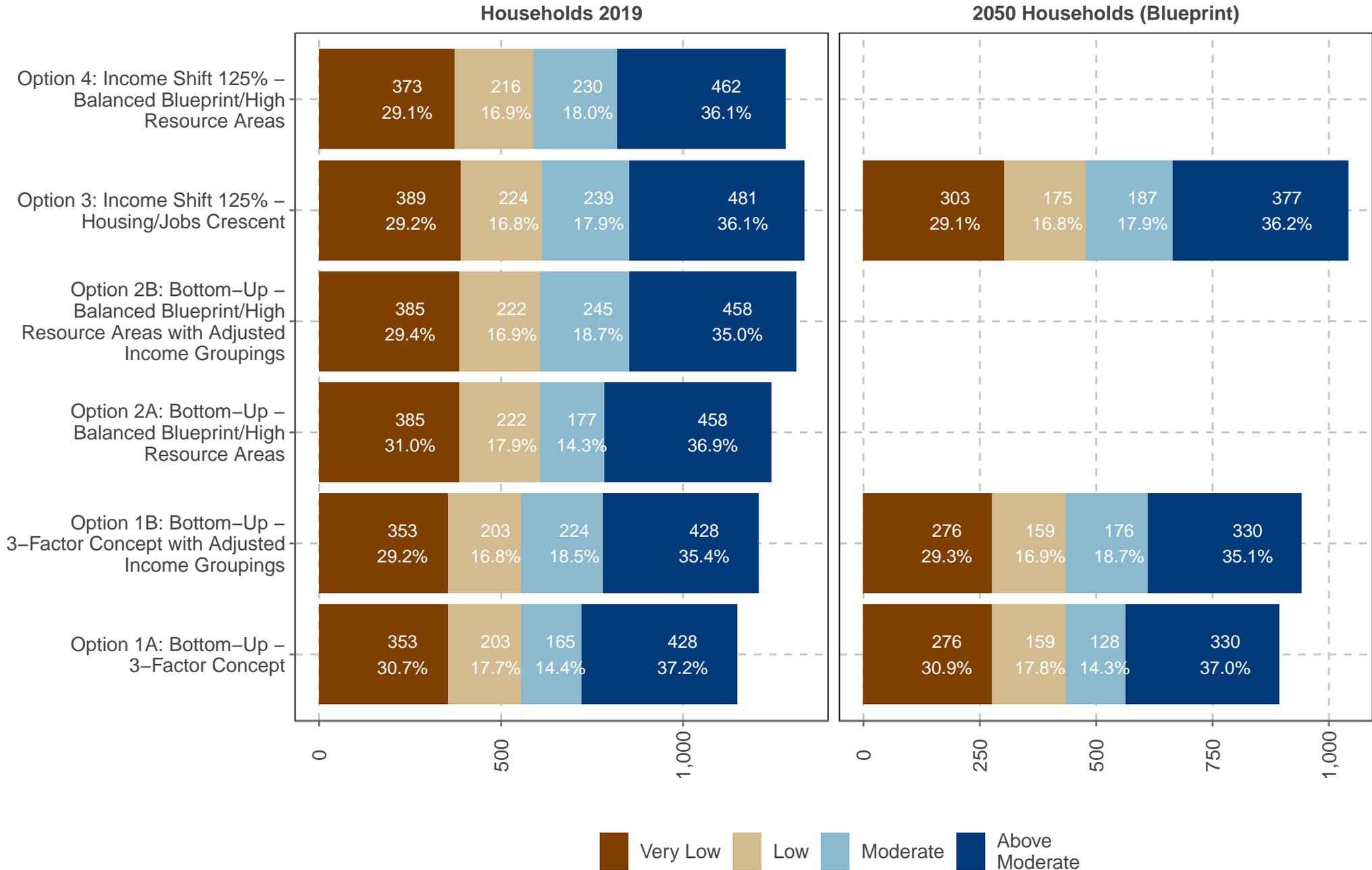
Appendix 4: Potential RHNA Allocation, Income Distribution Oakley (2019 households: 11931) (Contra Costa County)

Map shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details. Label shows allocation rounded to nearest 10.



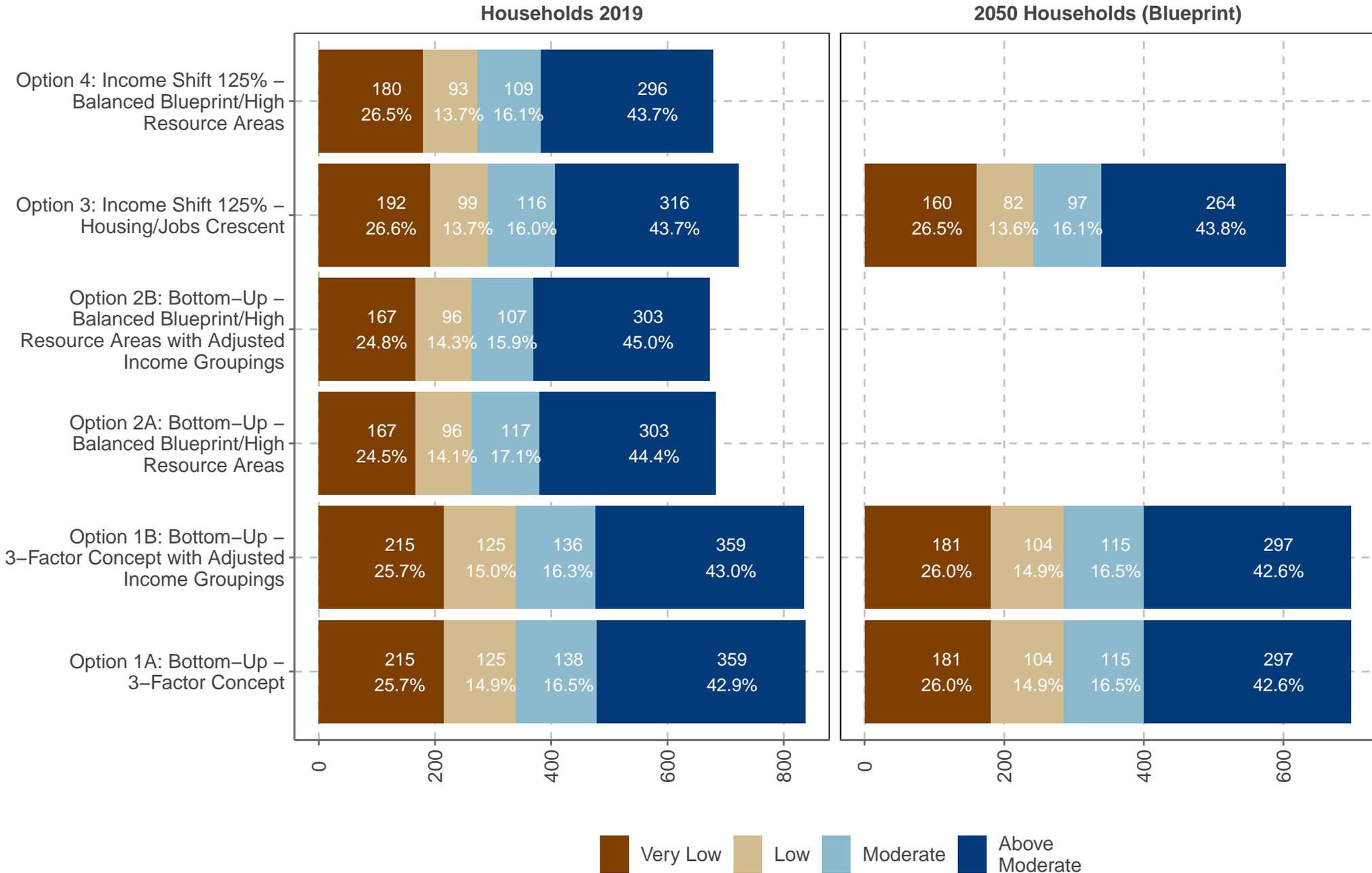
Appendix 4: Potential RHNA Allocation, Income Distribution Orinda (2019 households: 6827) (Contra Costa County)

Map shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details. Label shows allocation rounded to nearest 10.



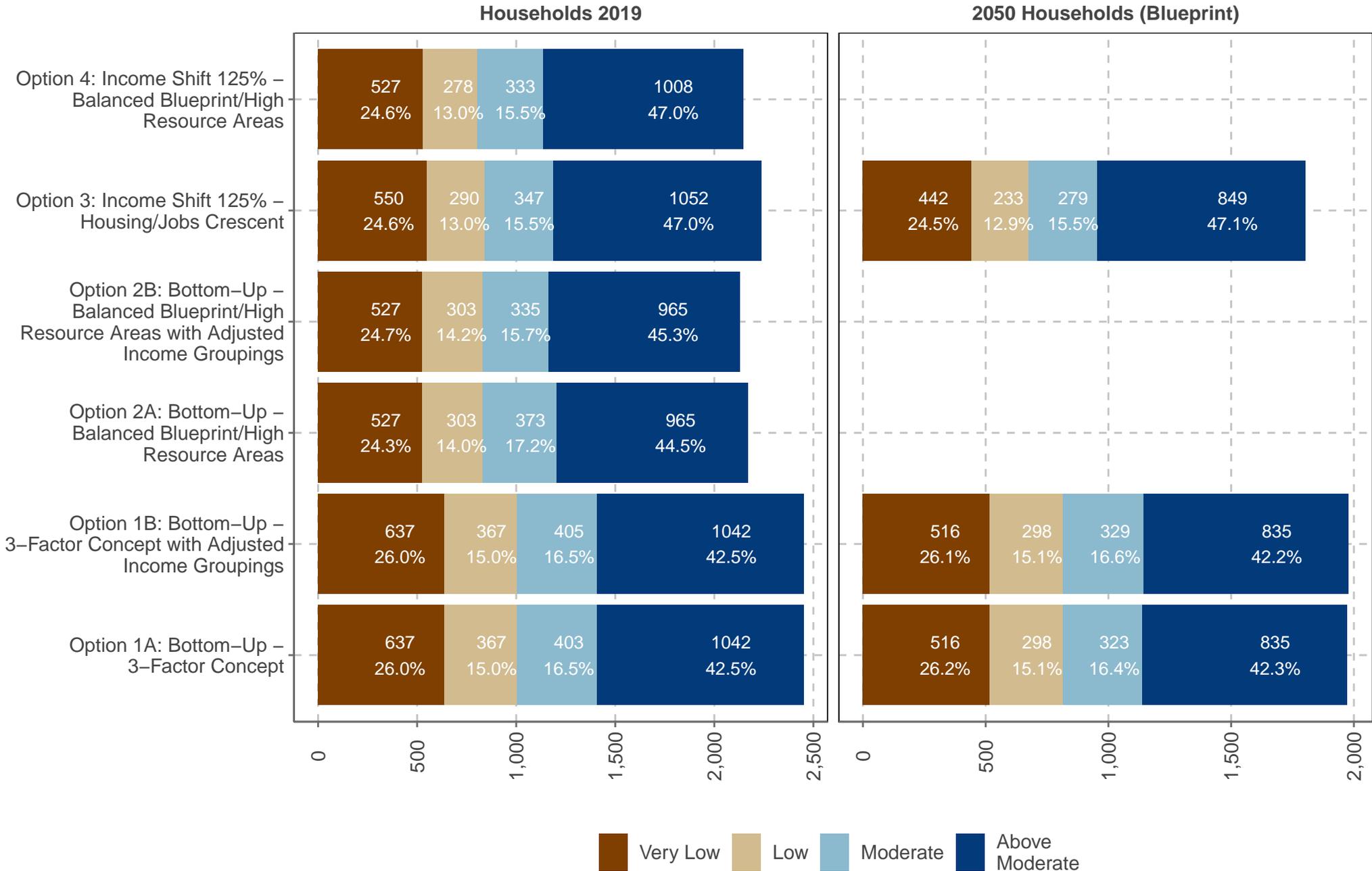
Appendix 4: Potential RHNA Allocation, Income Distribution Pinole (2019 households: 6778) (Contra Costa County)

Map shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details.
Label shows allocation rounded to nearest 10.



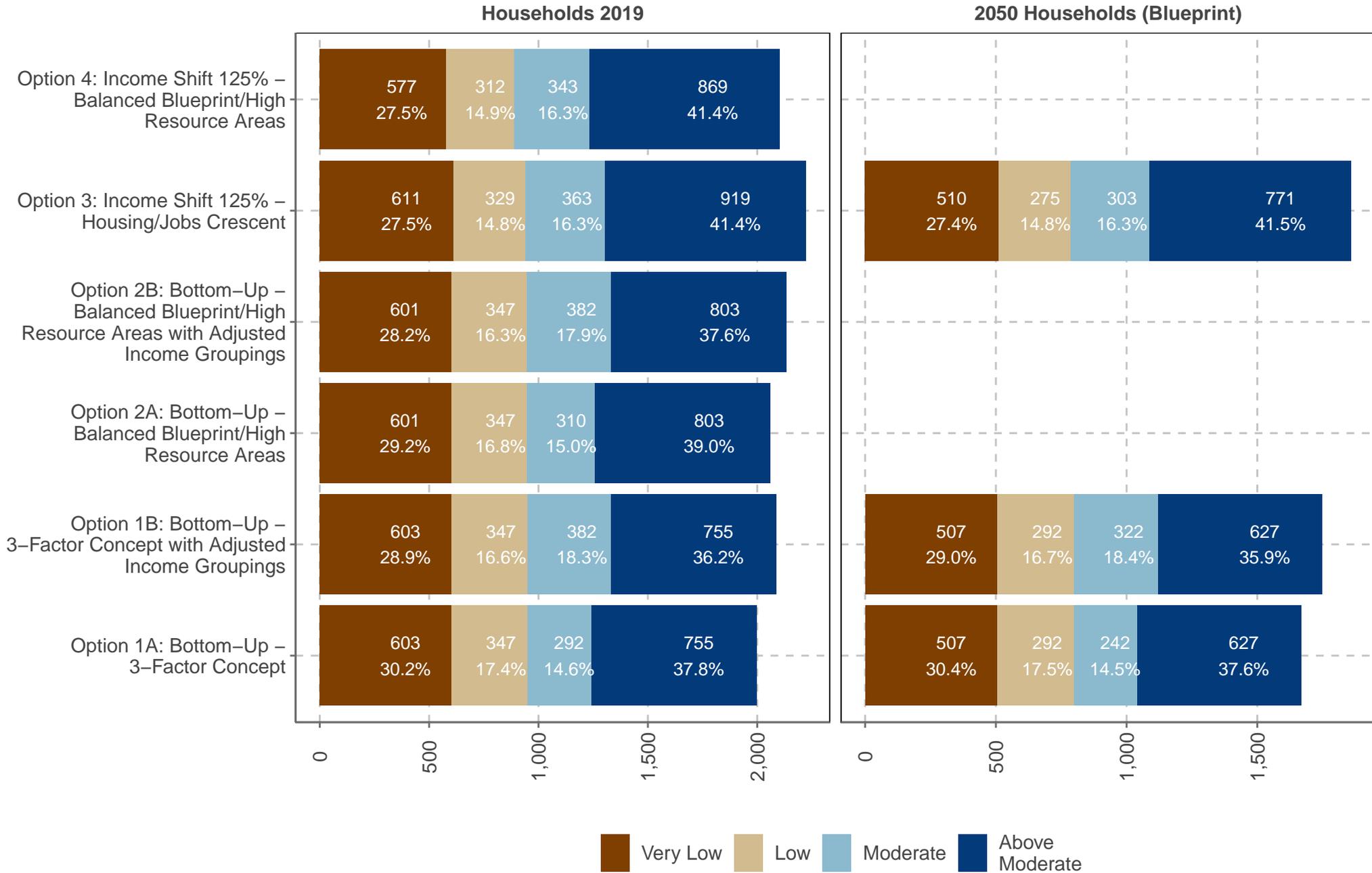
Appendix 4: Potential RHNA Allocation, Income Distribution Pittsburg (2019 households: 21136) (Contra Costa County)

Map shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details.
Label shows allocation rounded to nearest 10.



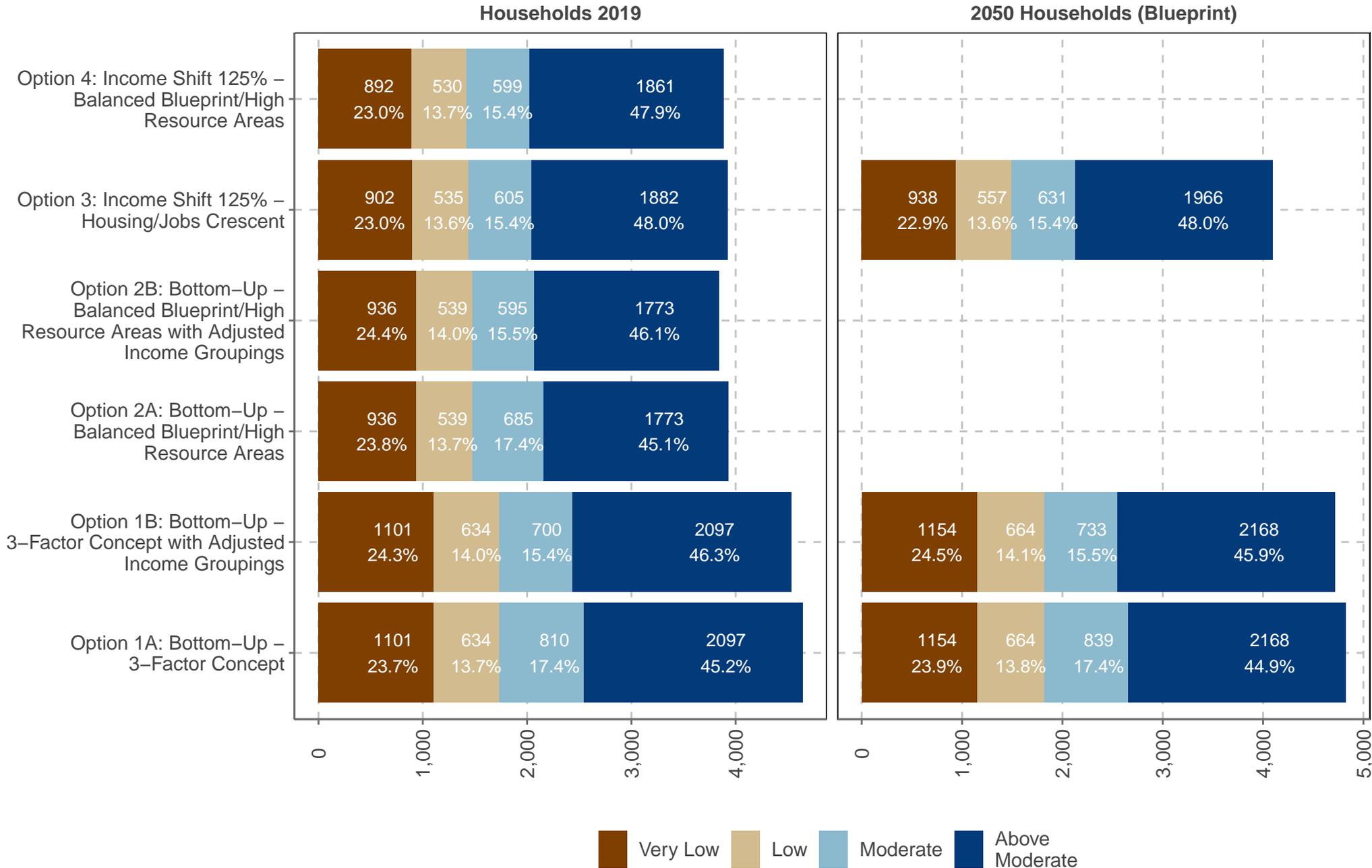
Appendix 4: Potential RHNA Allocation, Income Distribution Pleasant Hill (2019 households: 13685) (Contra Costa County)

Map shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details.
Label shows allocation rounded to nearest 10.



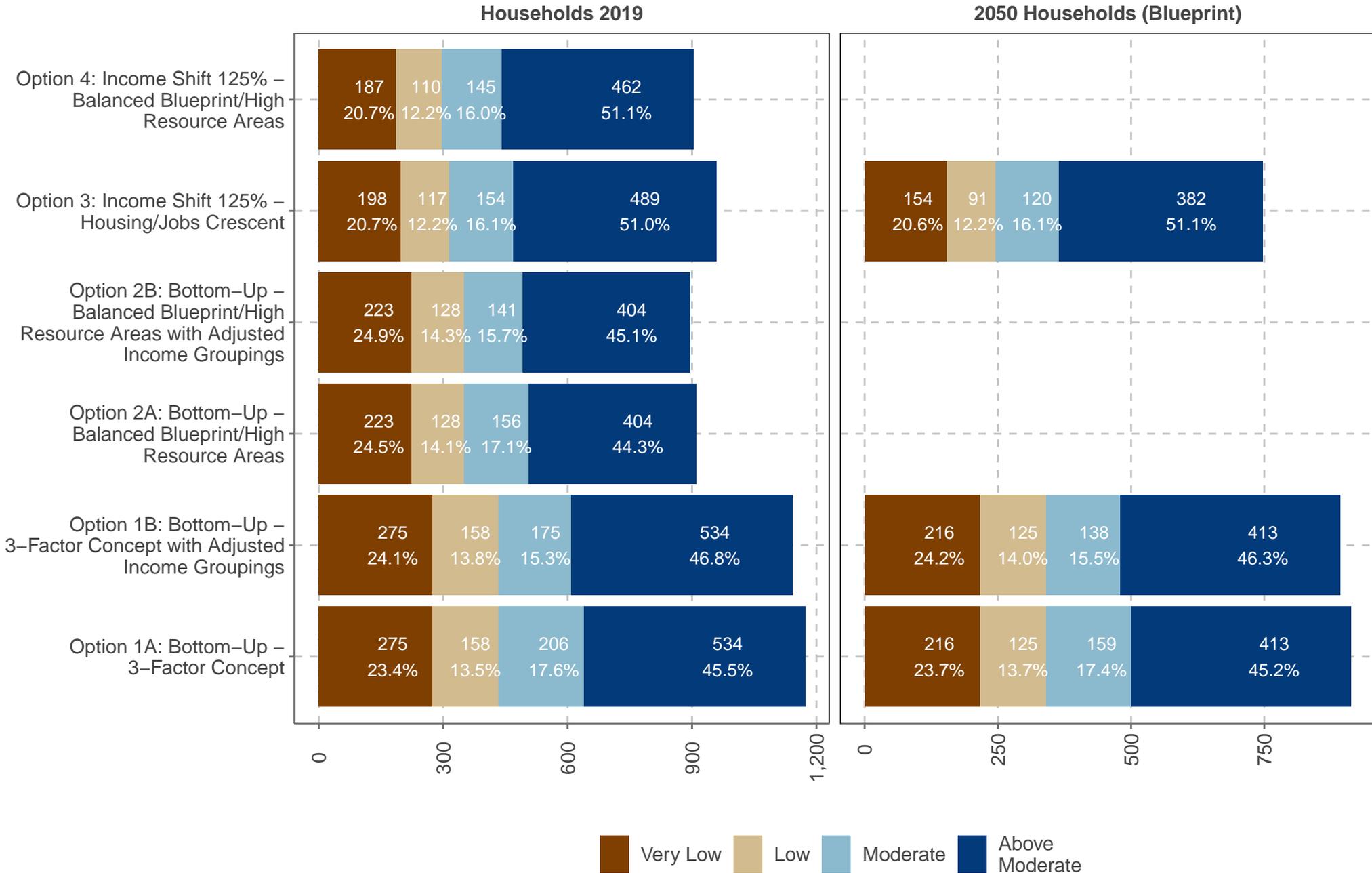
Appendix 4: Potential RHNA Allocation, Income Distribution Richmond (2019 households: 36352) (Contra Costa County)

Map shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details. Label shows allocation rounded to nearest 10.



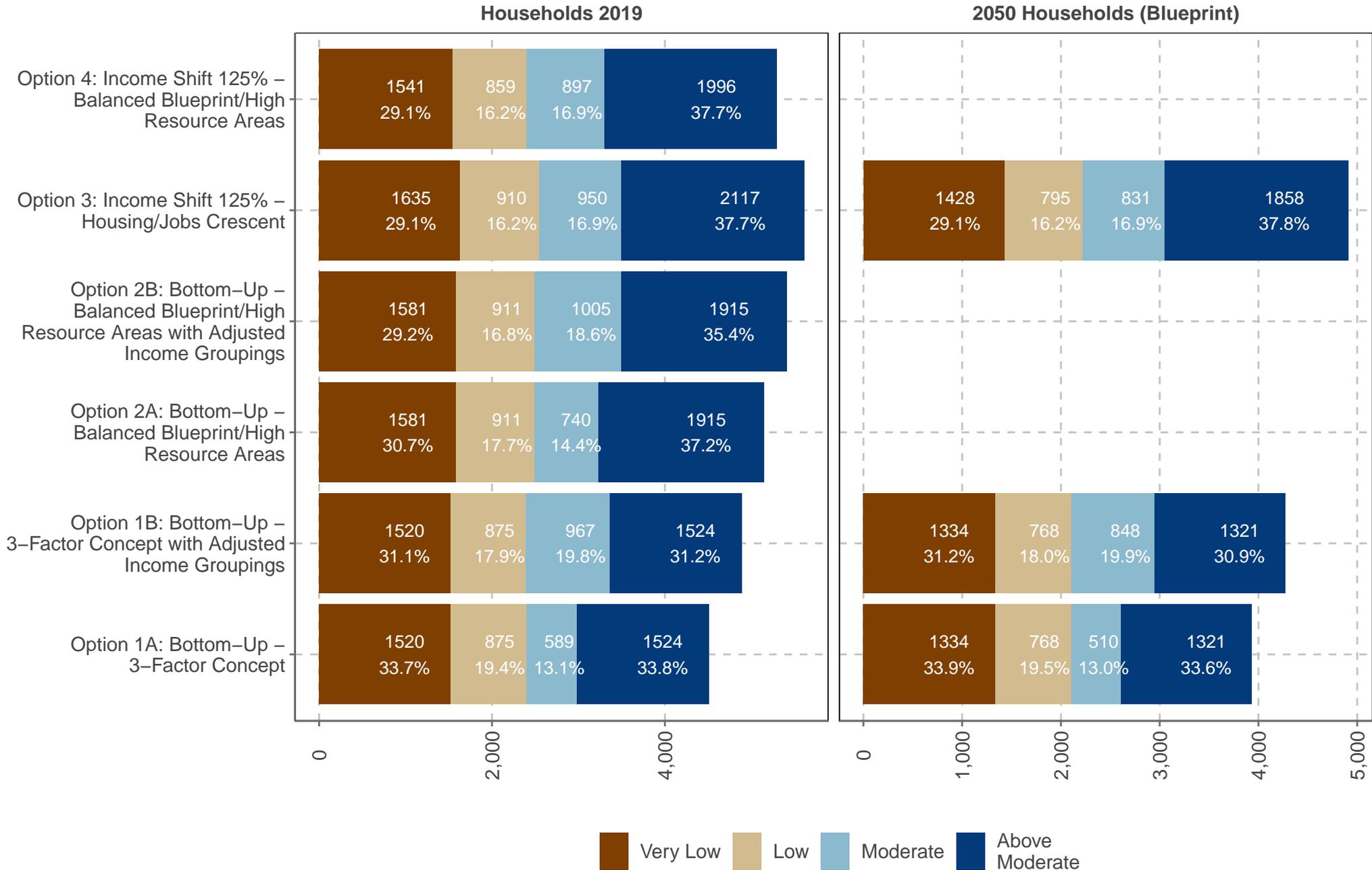
Appendix 4: Potential RHNA Allocation, Income Distribution San Pablo (2019 households: 9036) (Contra Costa County)

Map shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details. Label shows allocation rounded to nearest 10.



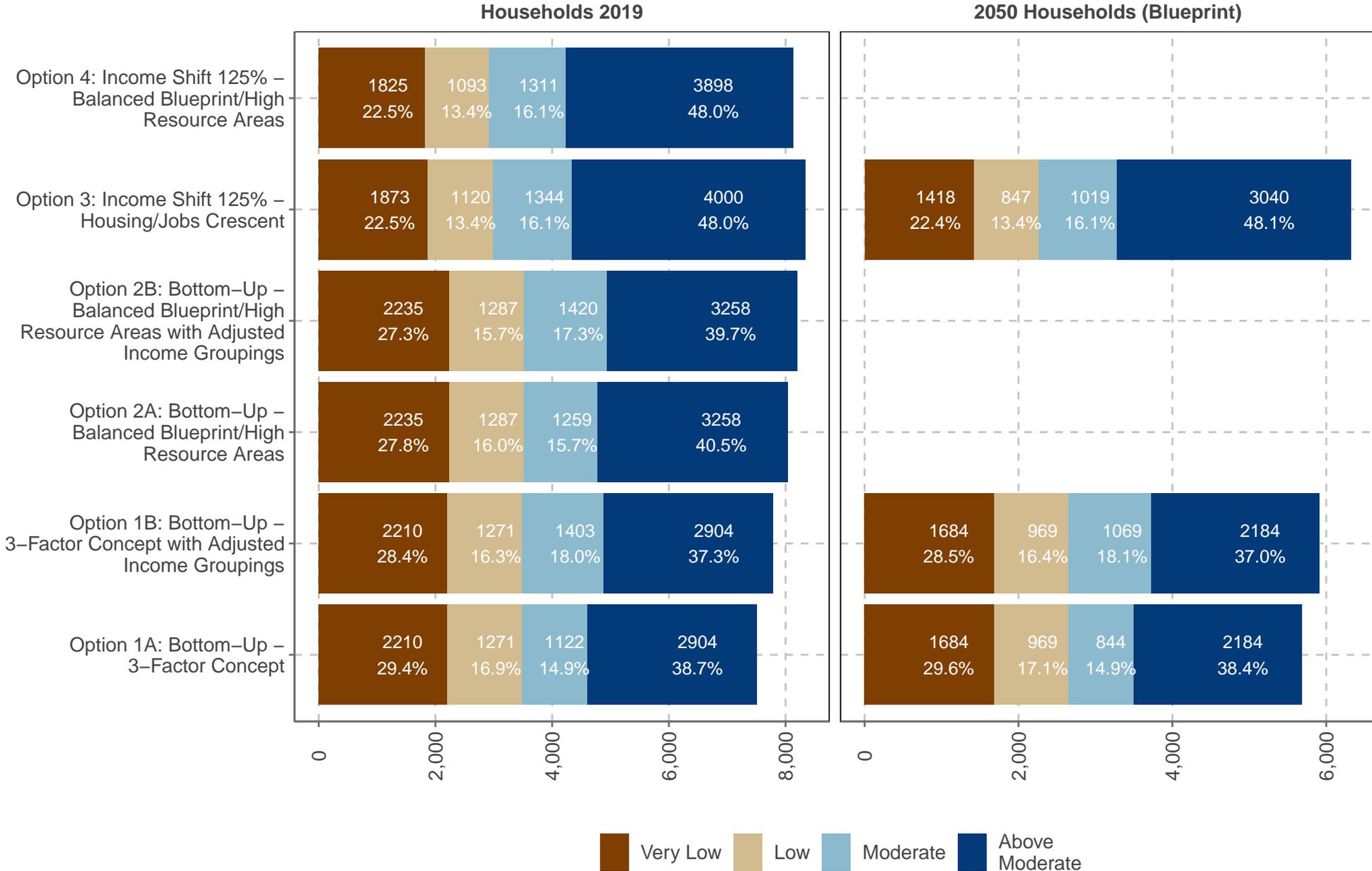
Appendix 4: Potential RHNA Allocation, Income Distribution San Ramon (2019 households: 27761) (Contra Costa County)

Map shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details.
Label shows allocation rounded to nearest 10.



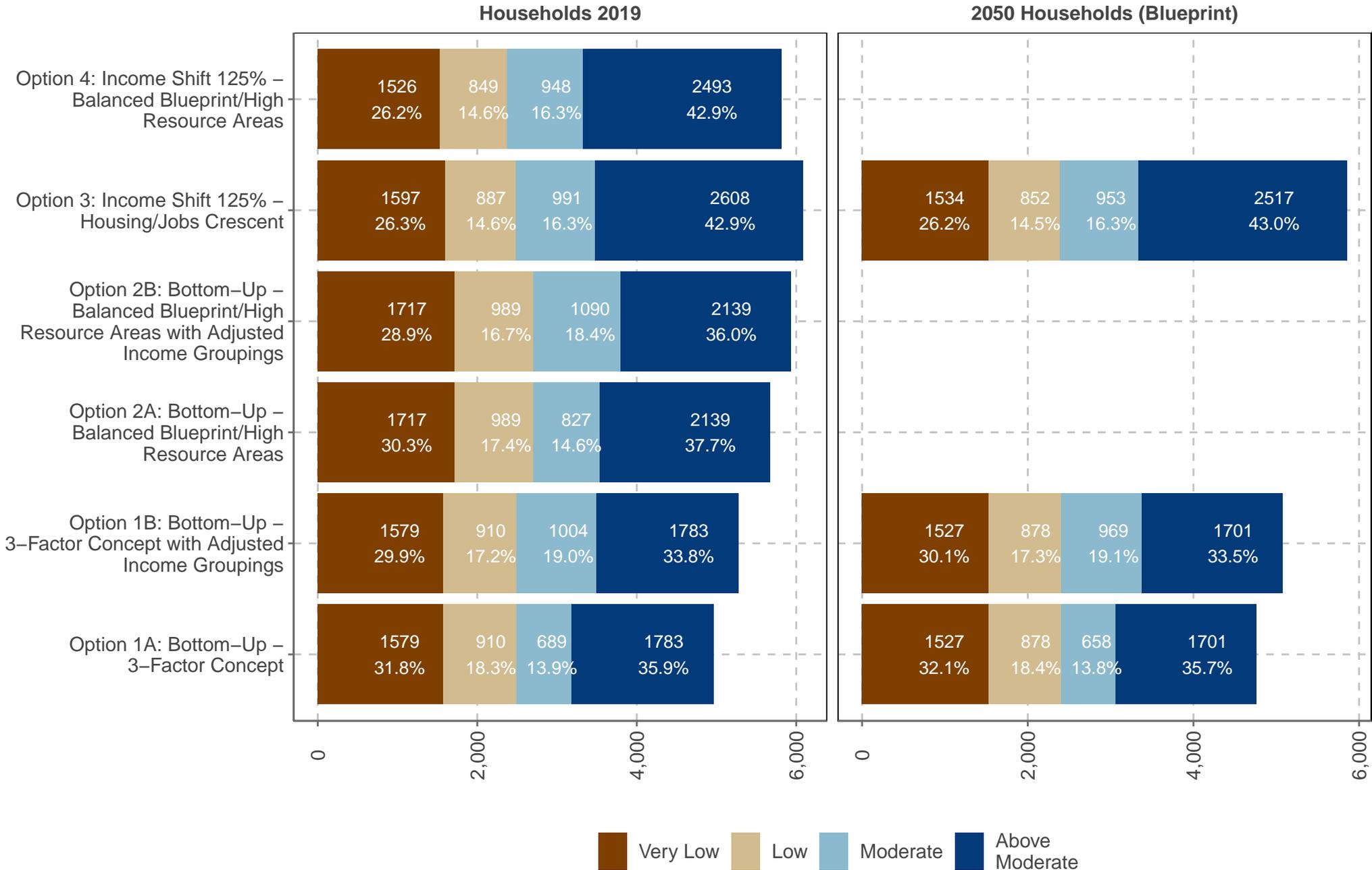
**Appendix 4: Potential RHNA Allocation, Income Distribution
Uninc. Contra Costa
(2019 households: 59109)
(Contra Costa County)**

Map shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details.
Label shows allocation rounded to nearest 10.



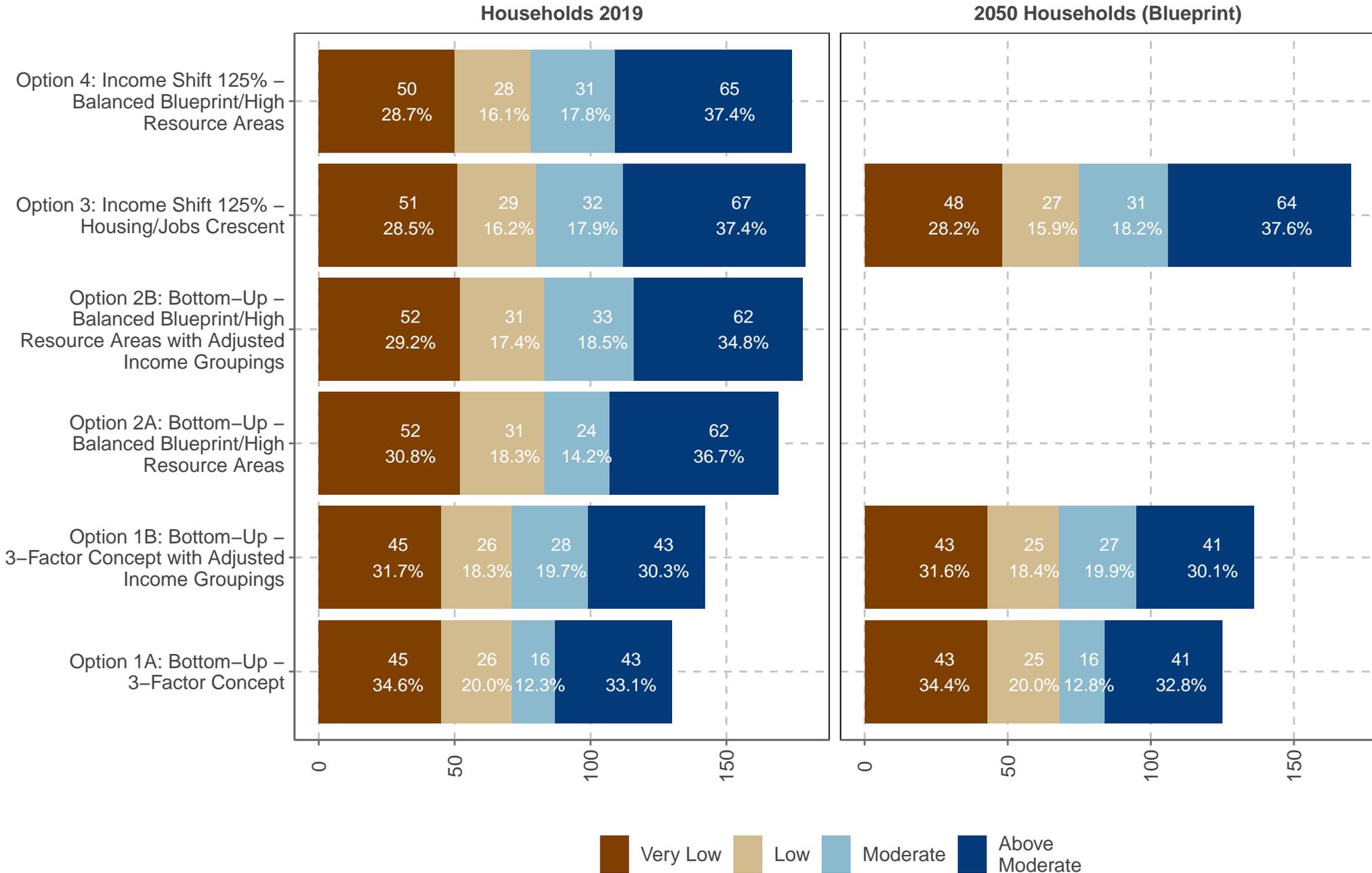
Appendix 4: Potential RHNA Allocation, Income Distribution Walnut Creek (2019 households: 31424) (Contra Costa County)

Map shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details.
Label shows allocation rounded to nearest 10.



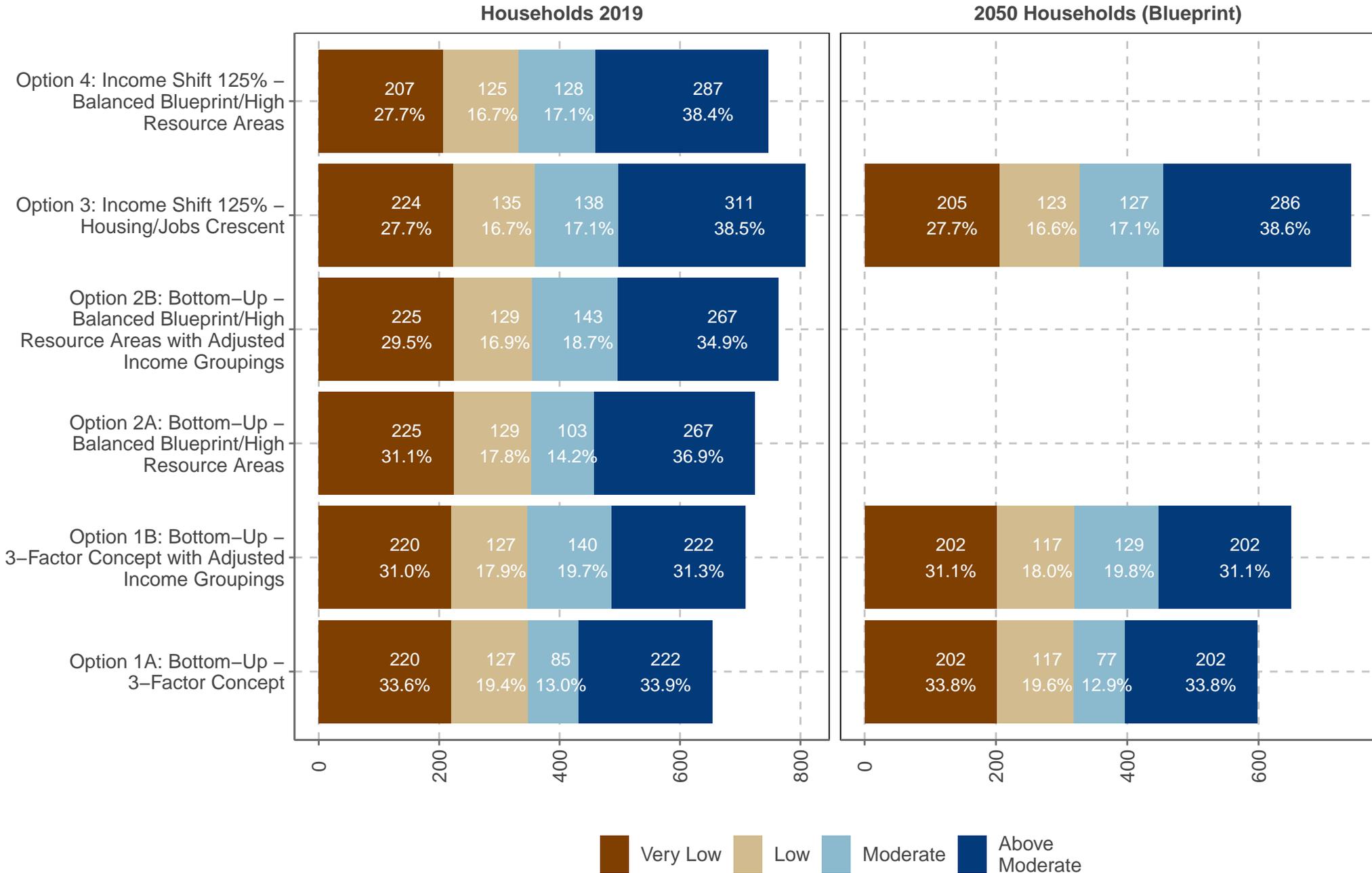
Appendix 4: Potential RHNA Allocation, Income Distribution Belvedere (2019 households: 931) (Marin County)

Map shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details. Label shows allocation rounded to nearest 10.



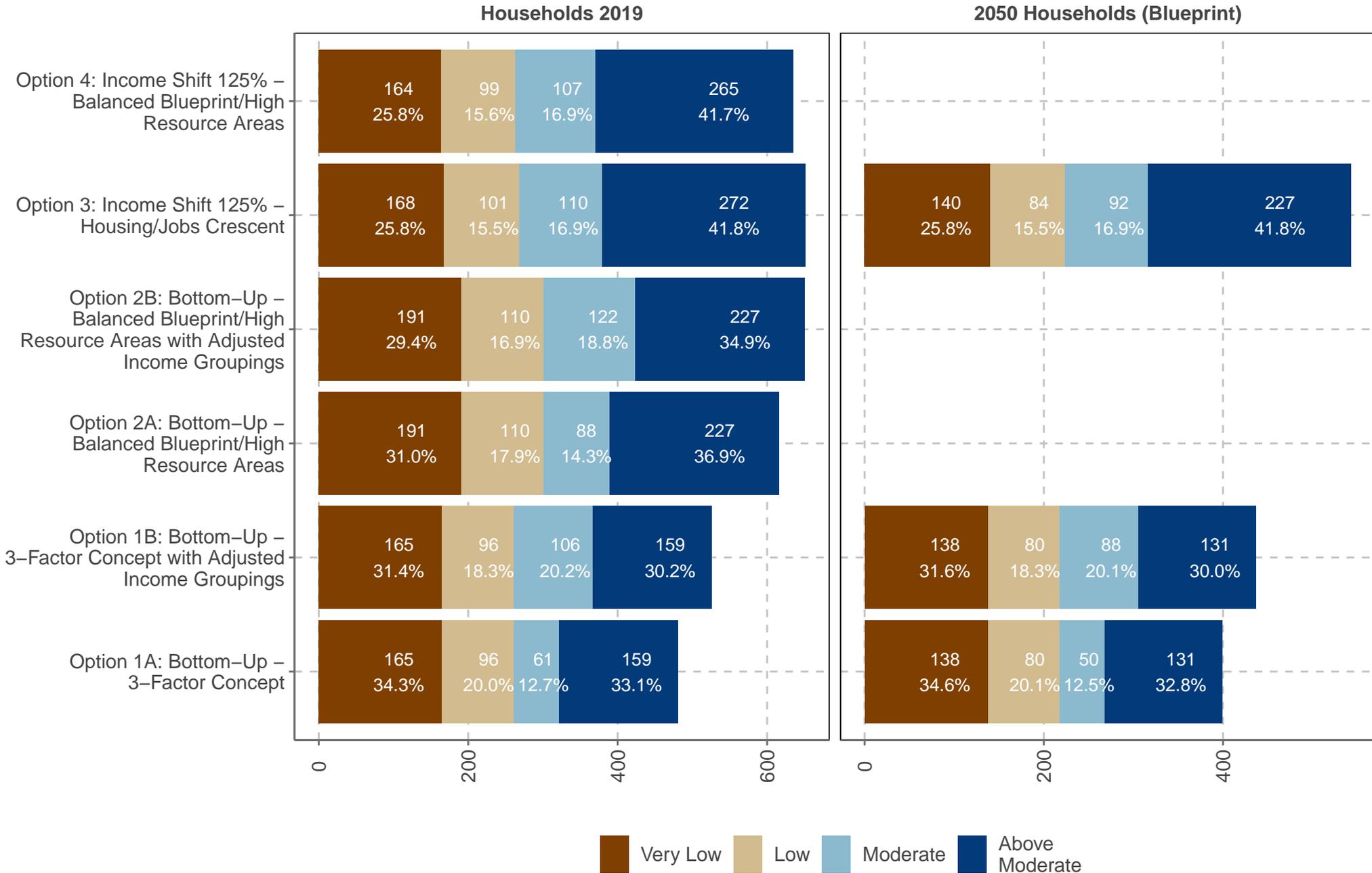
Appendix 4: Potential RHNA Allocation, Income Distribution Corte Madera (2019 households: 3978) (Marin County)

Map shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details. Label shows allocation rounded to nearest 10.



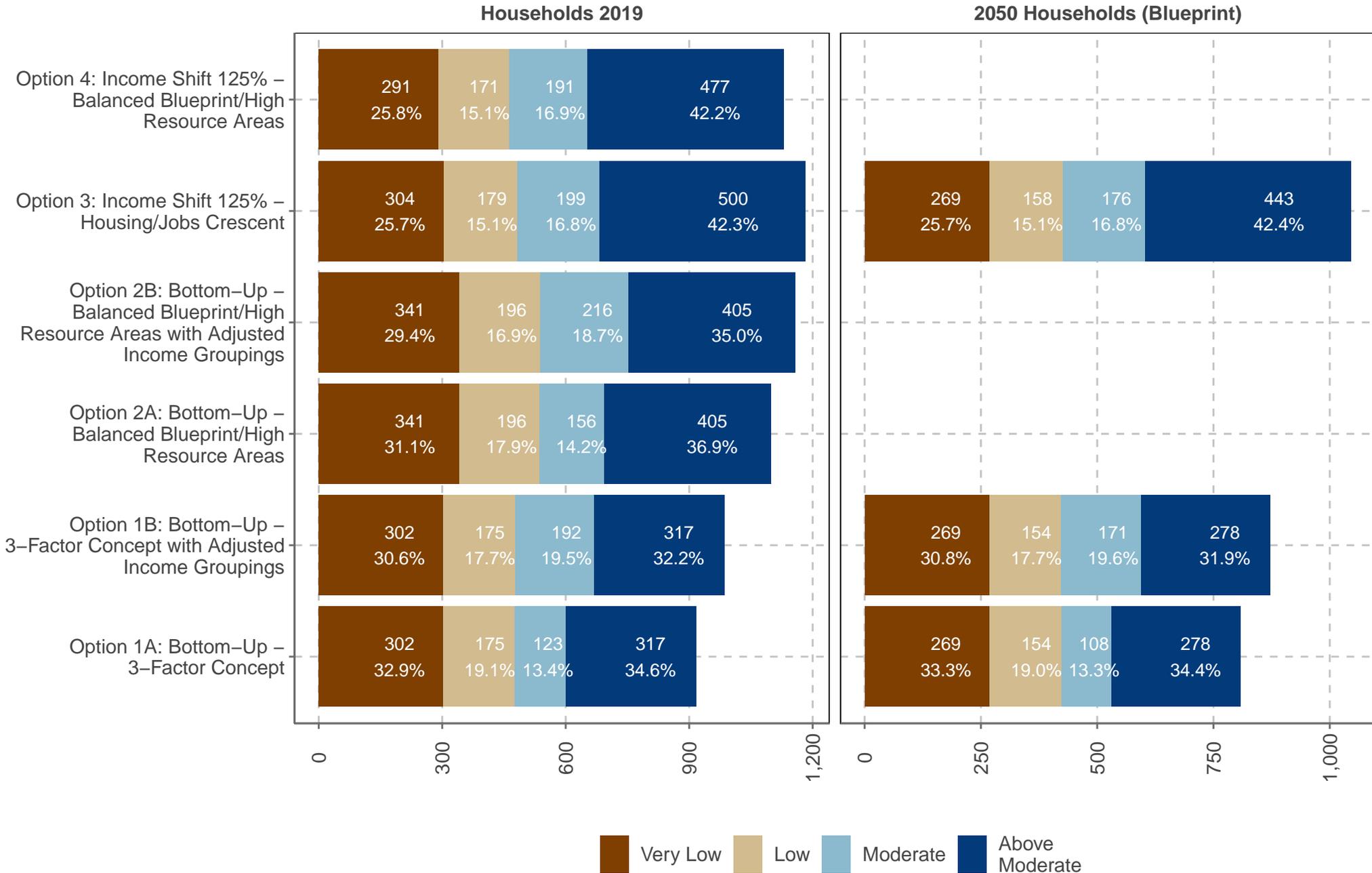
Appendix 4: Potential RHNA Allocation, Income Distribution Fairfax (2019 households: 3386) (Marin County)

Map shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details.
Label shows allocation rounded to nearest 10.



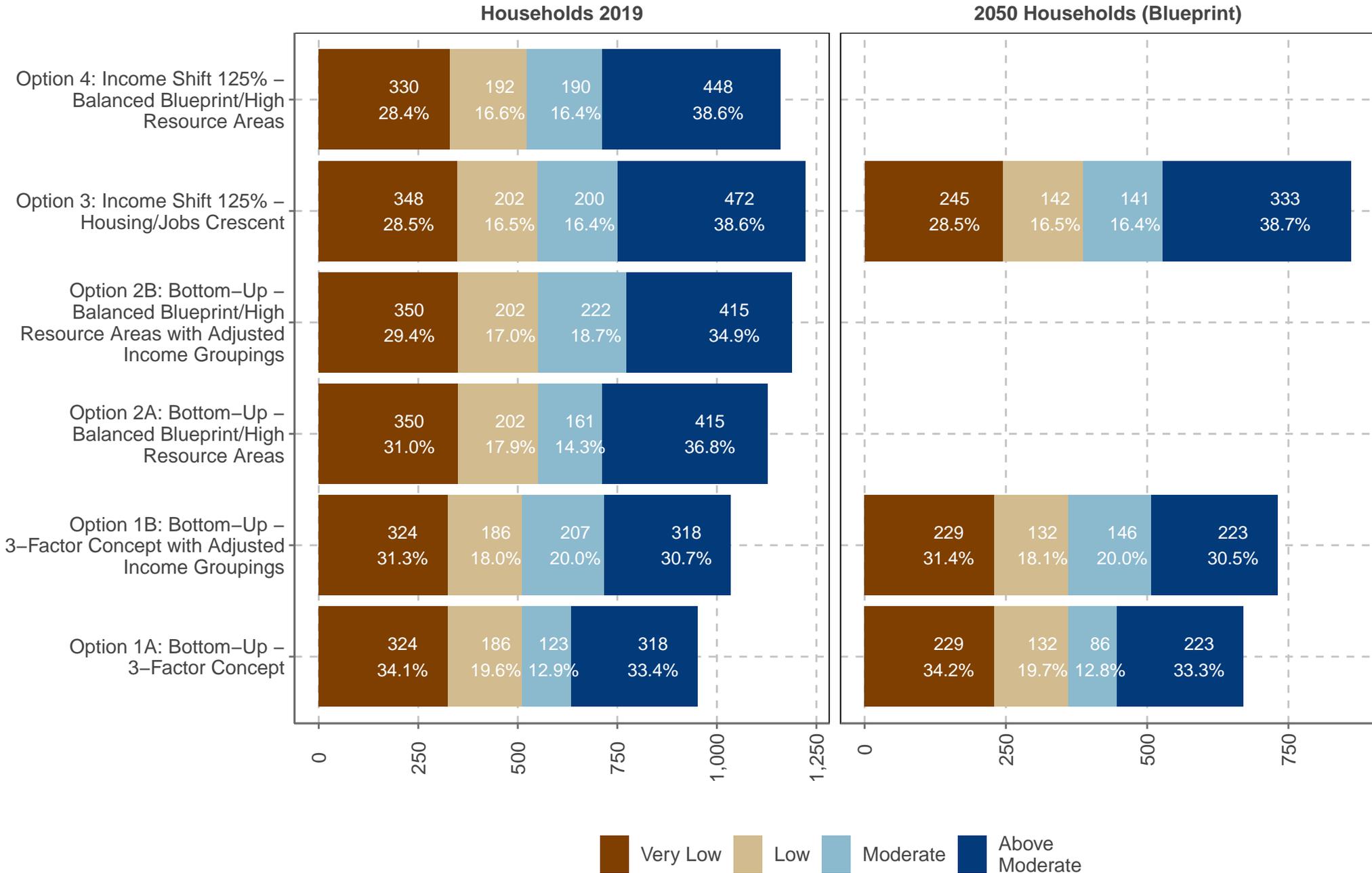
Appendix 4: Potential RHNA Allocation, Income Distribution
Larkspur
(2019 households: 6020)
(Marin County)

Map shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details.
 Label shows allocation rounded to nearest 10.



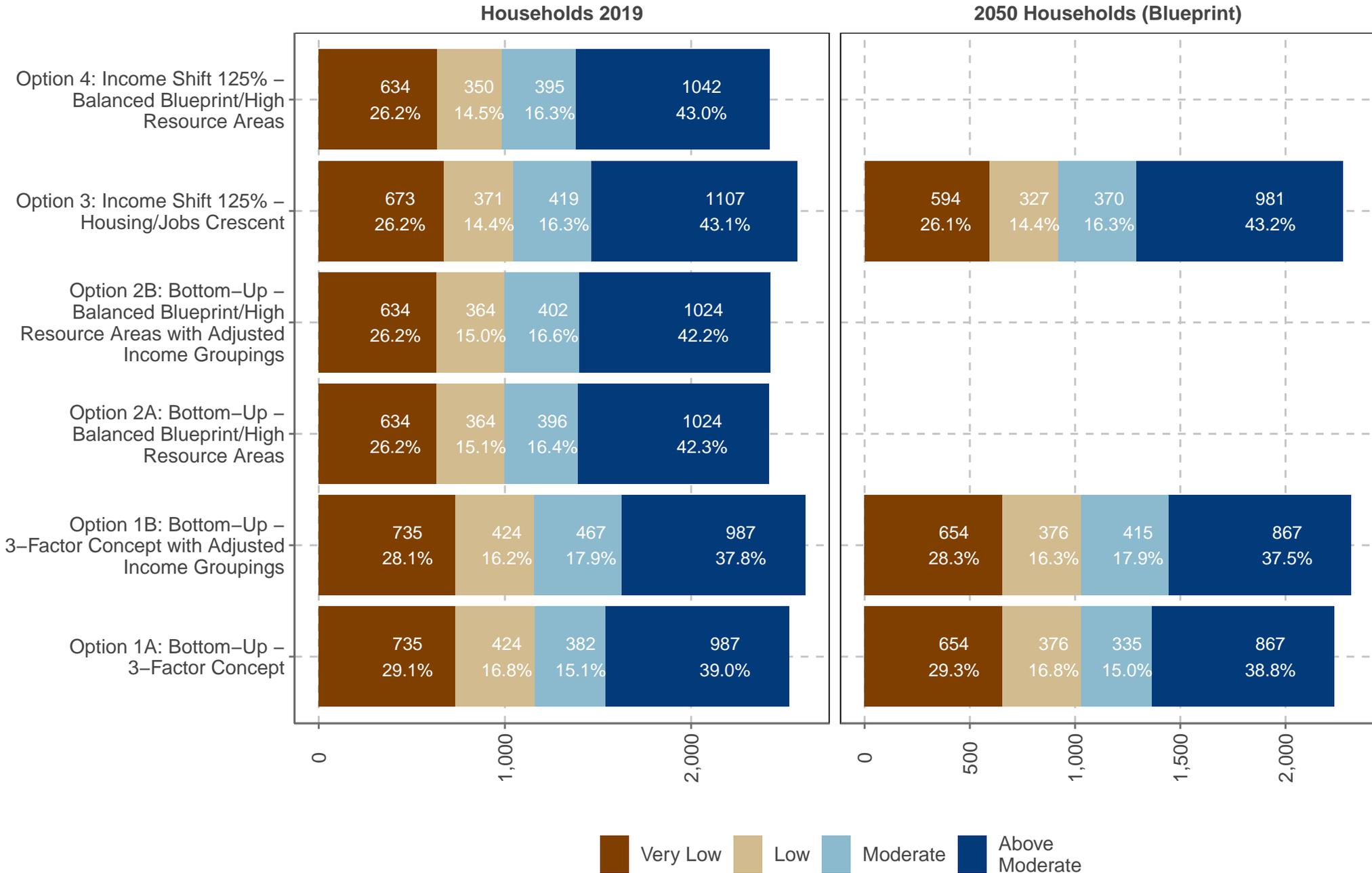
Appendix 4: Potential RHNA Allocation, Income Distribution Mill Valley (2019 households: 6201) (Marin County)

Map shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details. Label shows allocation rounded to nearest 10.



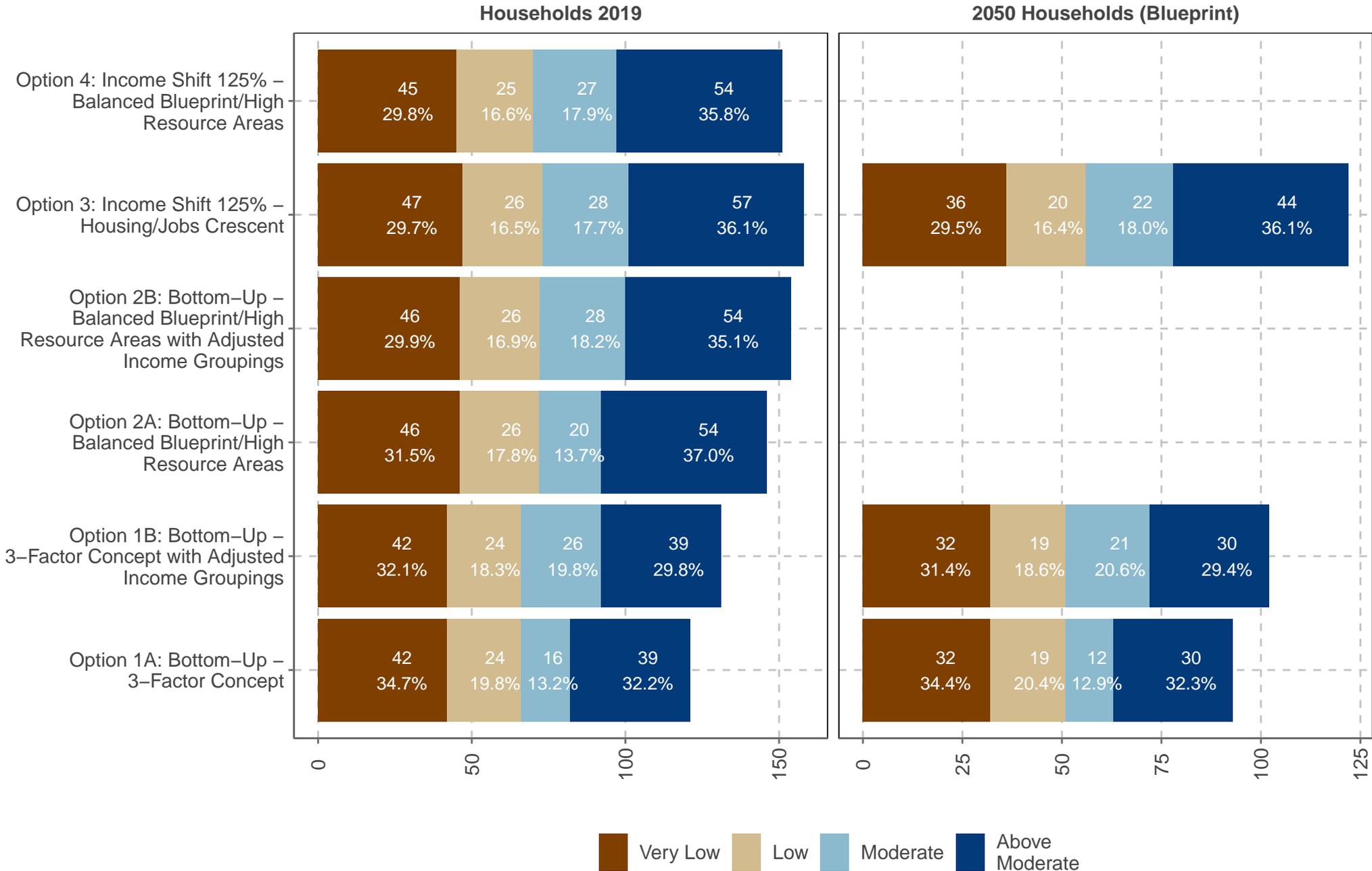
Appendix 4: Potential RHNA Allocation, Income Distribution Novato (2019 households: 20445) (Marin County)

Map shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details.
Label shows allocation rounded to nearest 10.



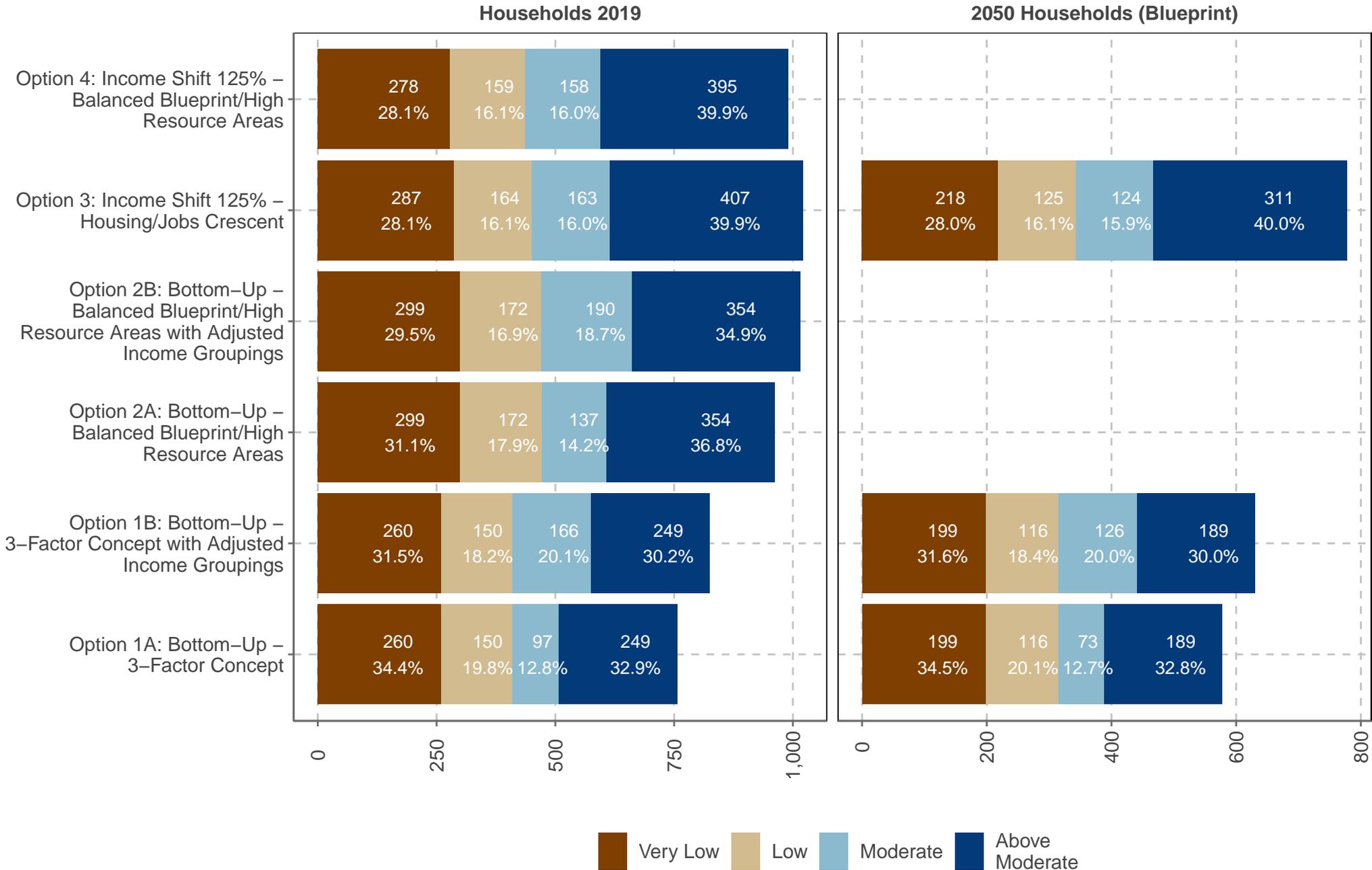
Appendix 4: Potential RHNA Allocation, Income Distribution Ross (2019 households: 807) (Marin County)

Map shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details. Label shows allocation rounded to nearest 10.



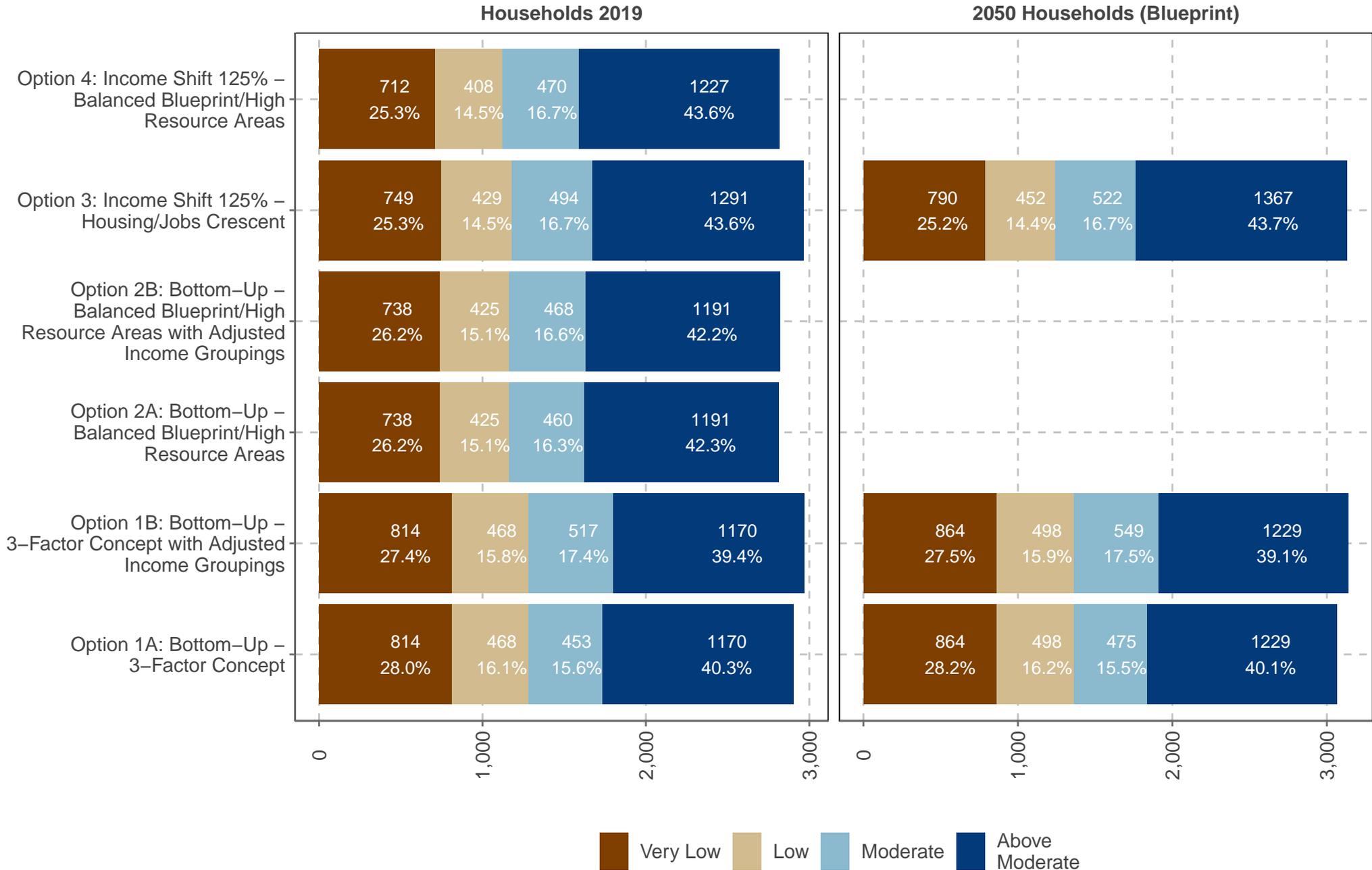
Appendix 4: Potential RHNA Allocation, Income Distribution San Anselmo (2019 households: 5293) (Marin County)

Map shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details. Label shows allocation rounded to nearest 10.



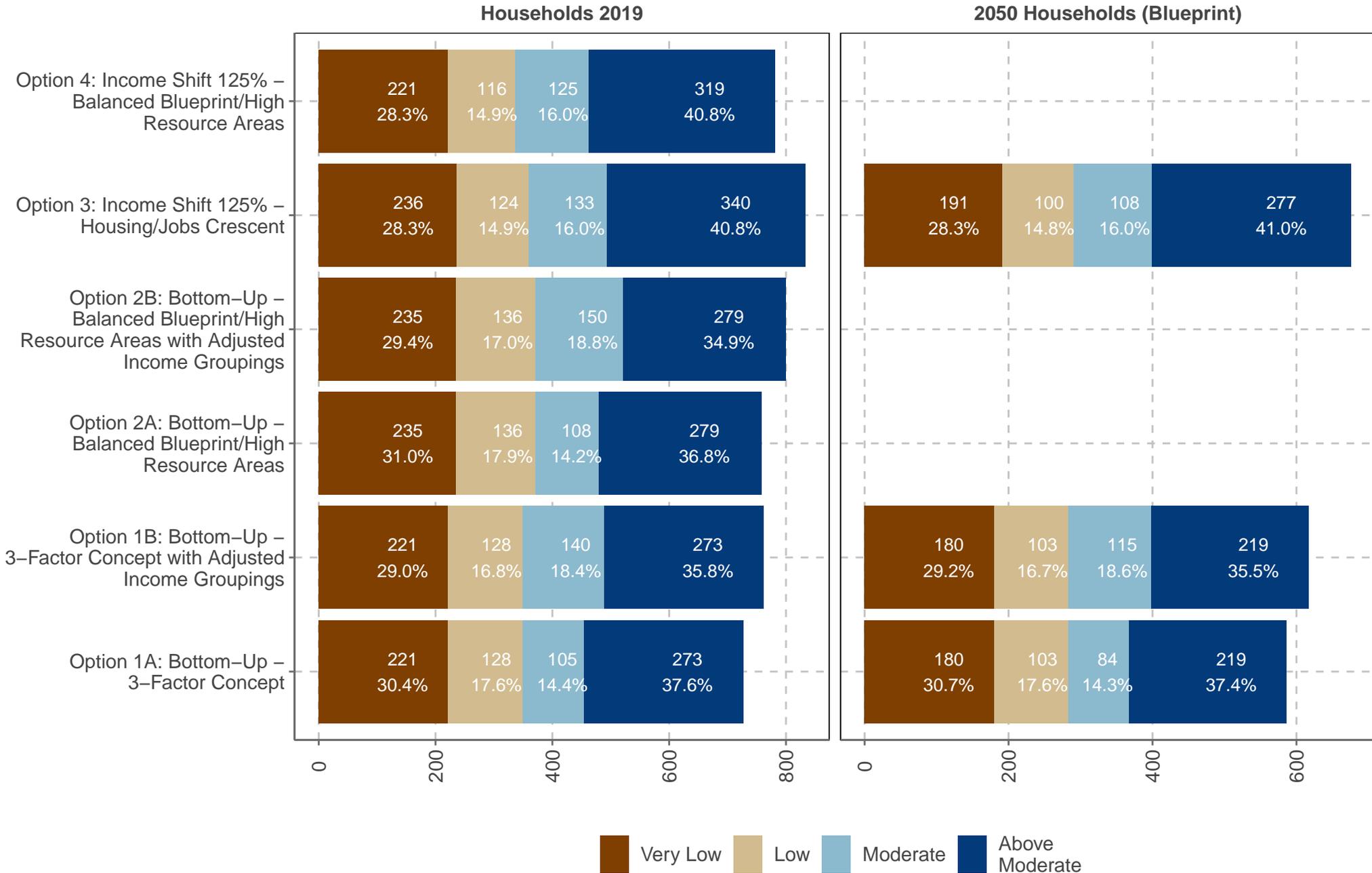
Appendix 4: Potential RHNA Allocation, Income Distribution San Rafael (2019 households: 22876) (Marin County)

Map shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details. Label shows allocation rounded to nearest 10.



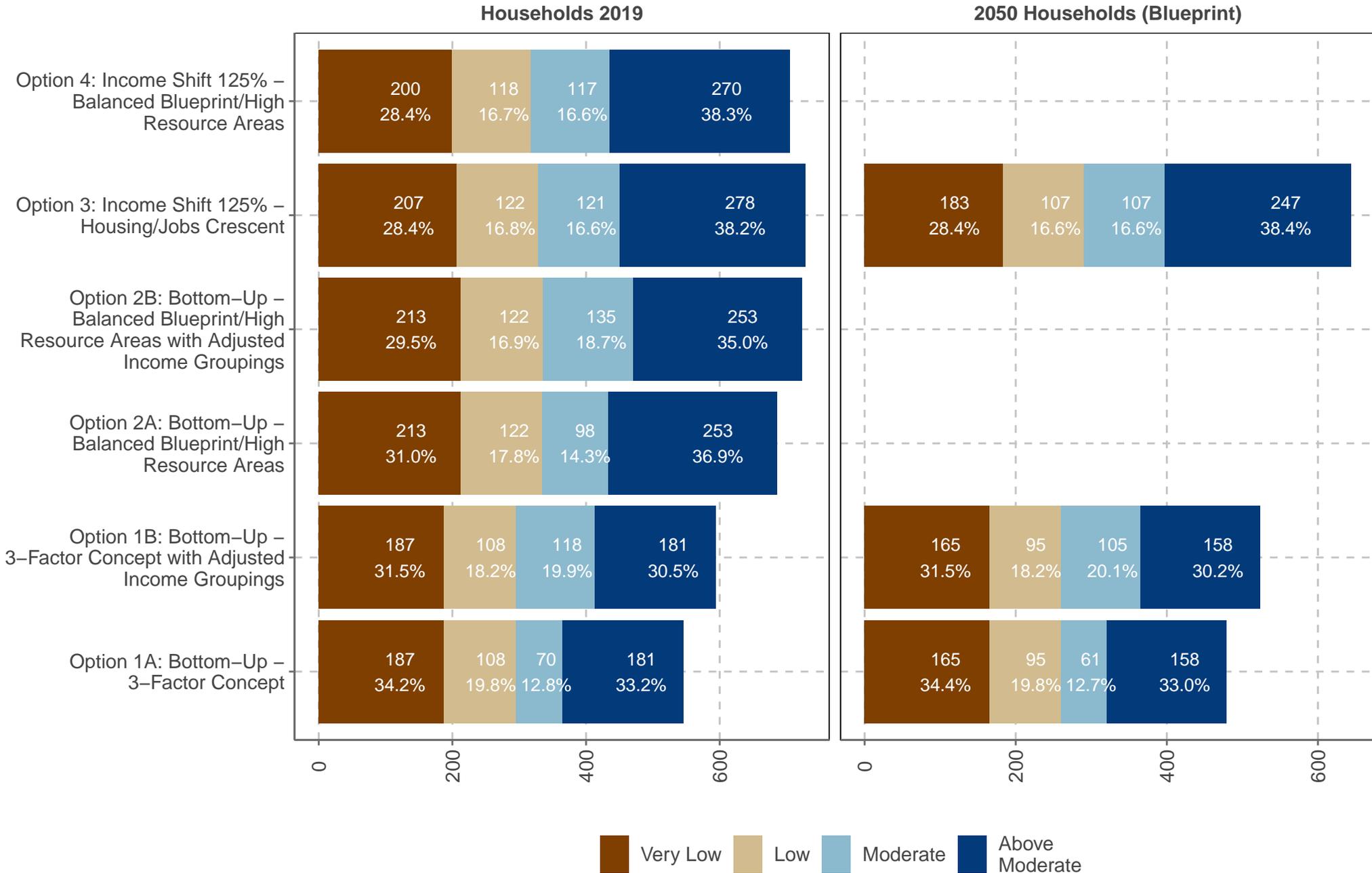
Appendix 4: Potential RHNA Allocation, Income Distribution Sausalito (2019 households: 4170) (Marin County)

Map shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details. Label shows allocation rounded to nearest 10.



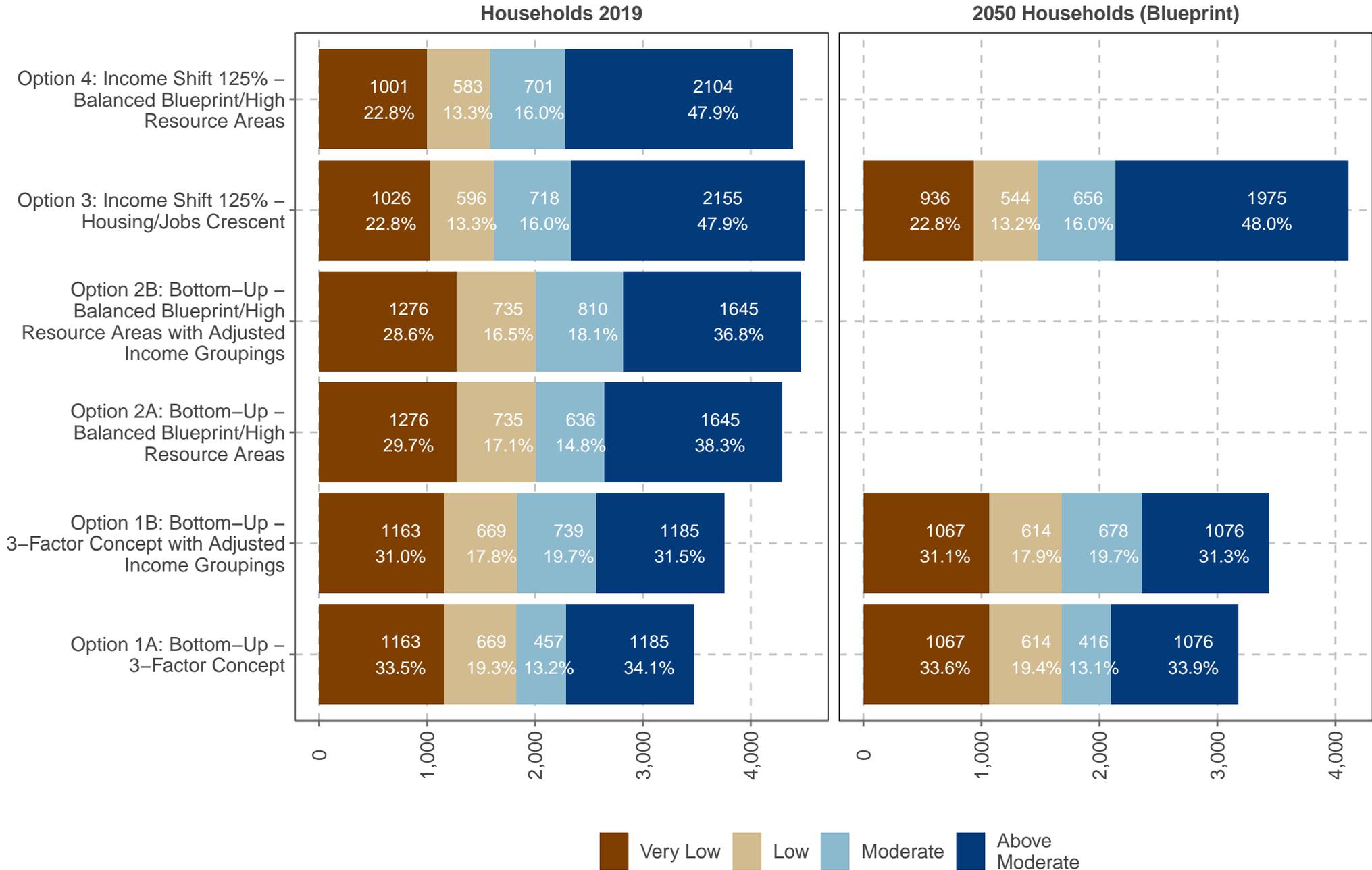
Appendix 4: Potential RHNA Allocation, Income Distribution Tiburon (2019 households: 3761) (Marin County)

Map shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details. Label shows allocation rounded to nearest 10.



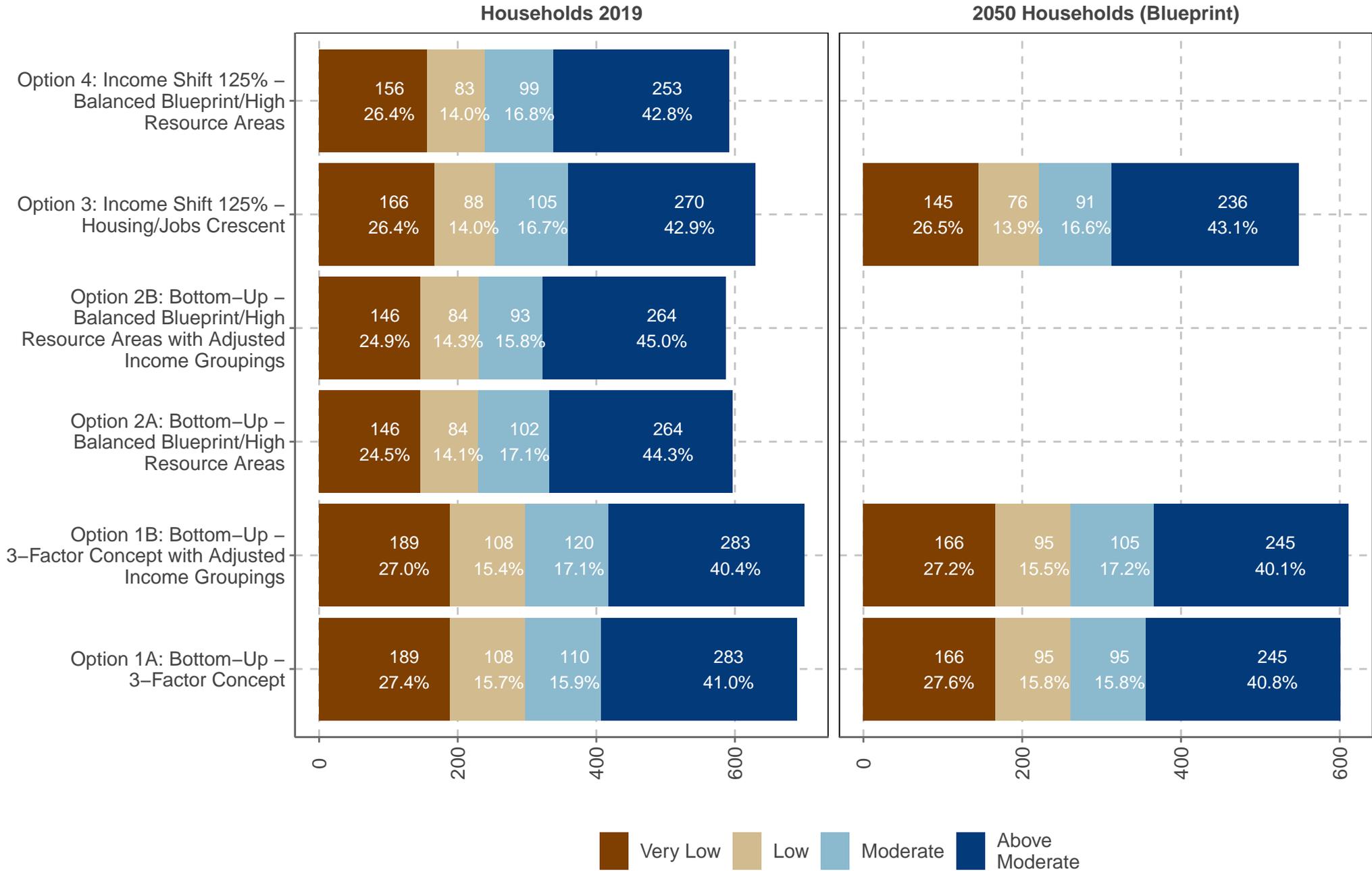
**Appendix 4: Potential RHNA Allocation, Income Distribution
Uninc. Marin
(2019 households: 26421)
(Marin County)**

Map shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details.
Label shows allocation rounded to nearest 10.



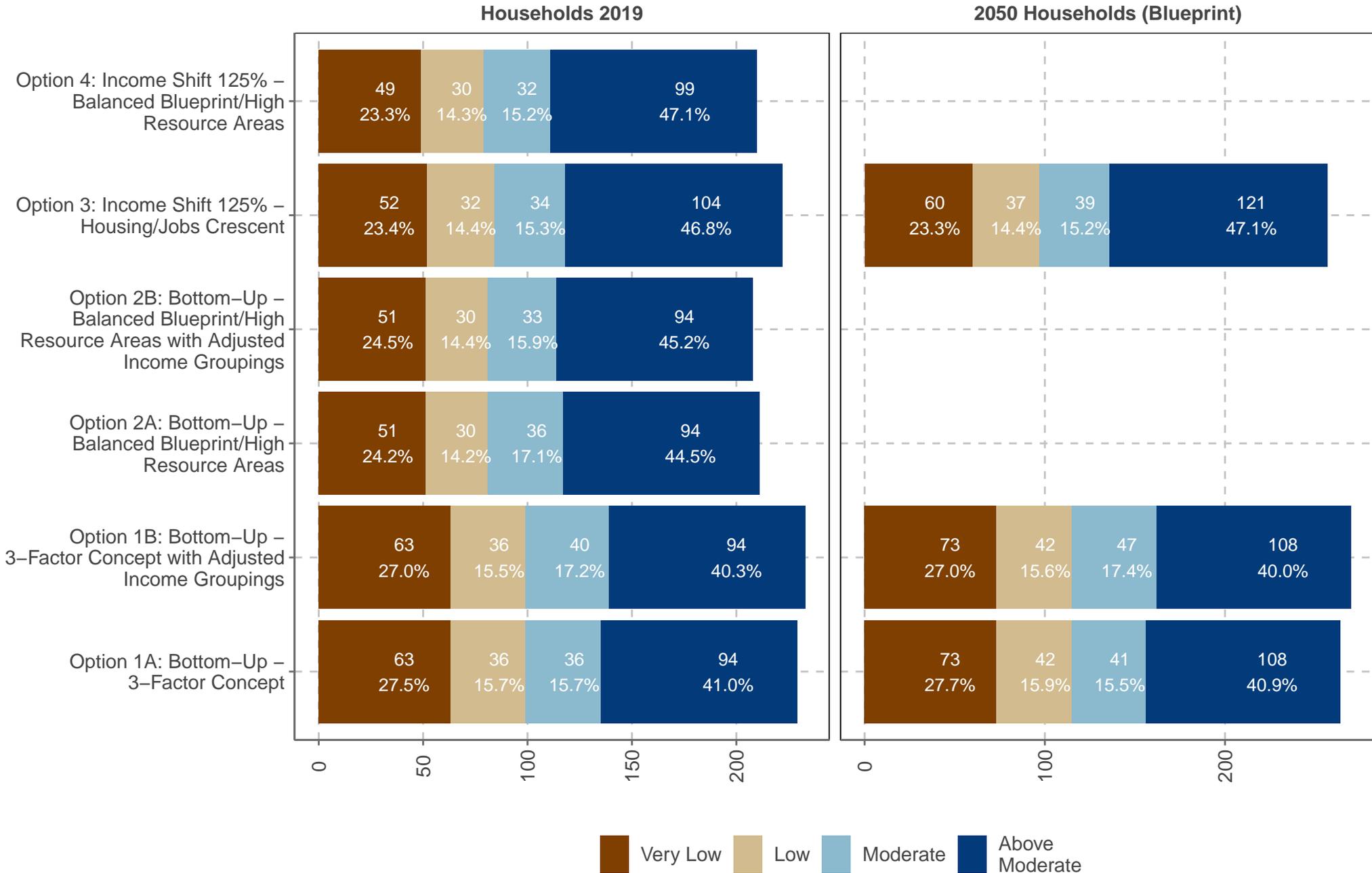
Appendix 4: Potential RHNA Allocation, Income Distribution American Canyon (2019 households: 5884) (Napa County)

Map shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details. Label shows allocation rounded to nearest 10.



Appendix 4: Potential RHNA Allocation, Income Distribution Calistoga (2019 households: 2100) (Napa County)

Map shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details. Label shows allocation rounded to nearest 10.

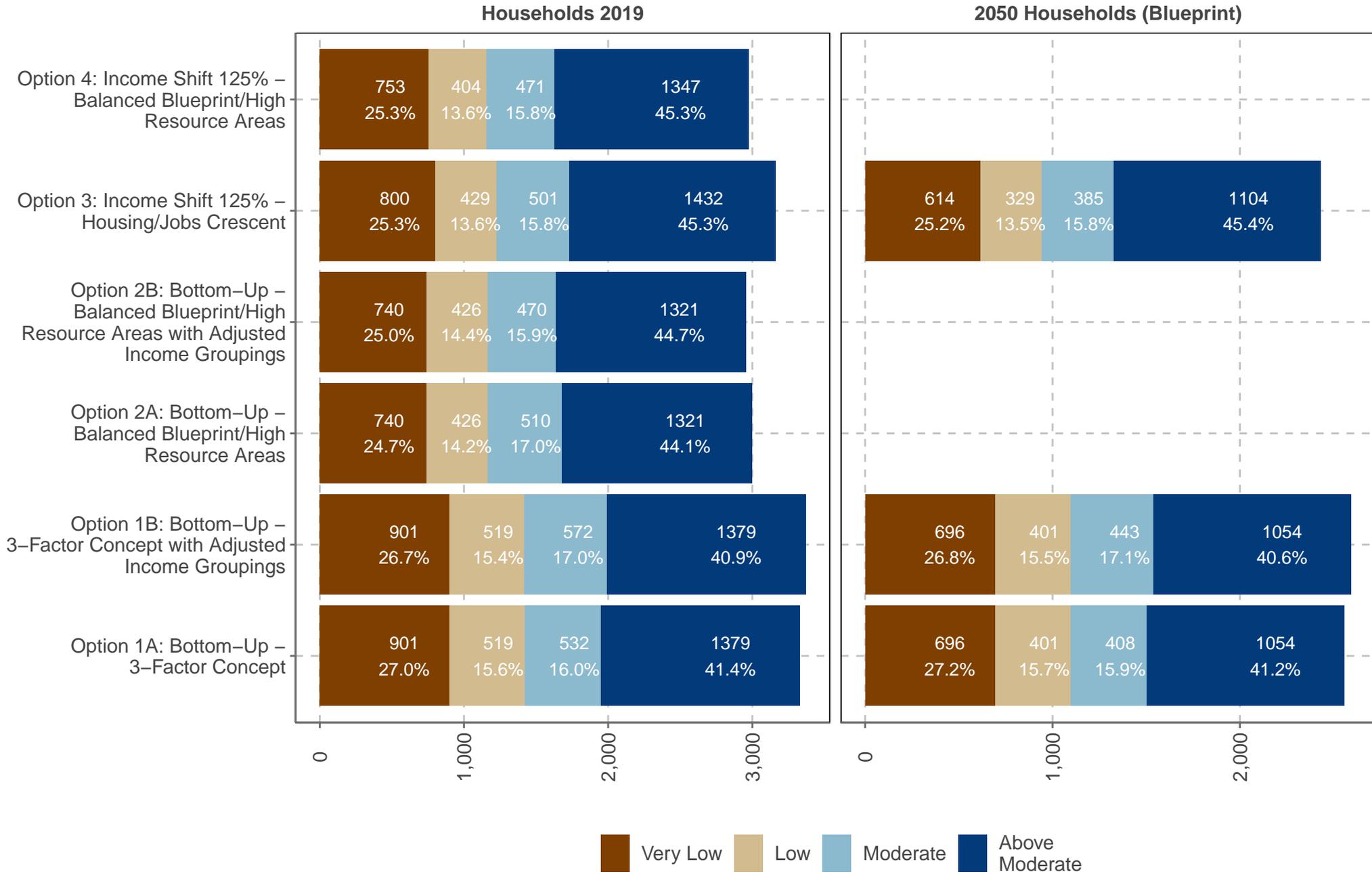


Appendix 4: Potential RHNA Allocation, Income Distribution

Napa

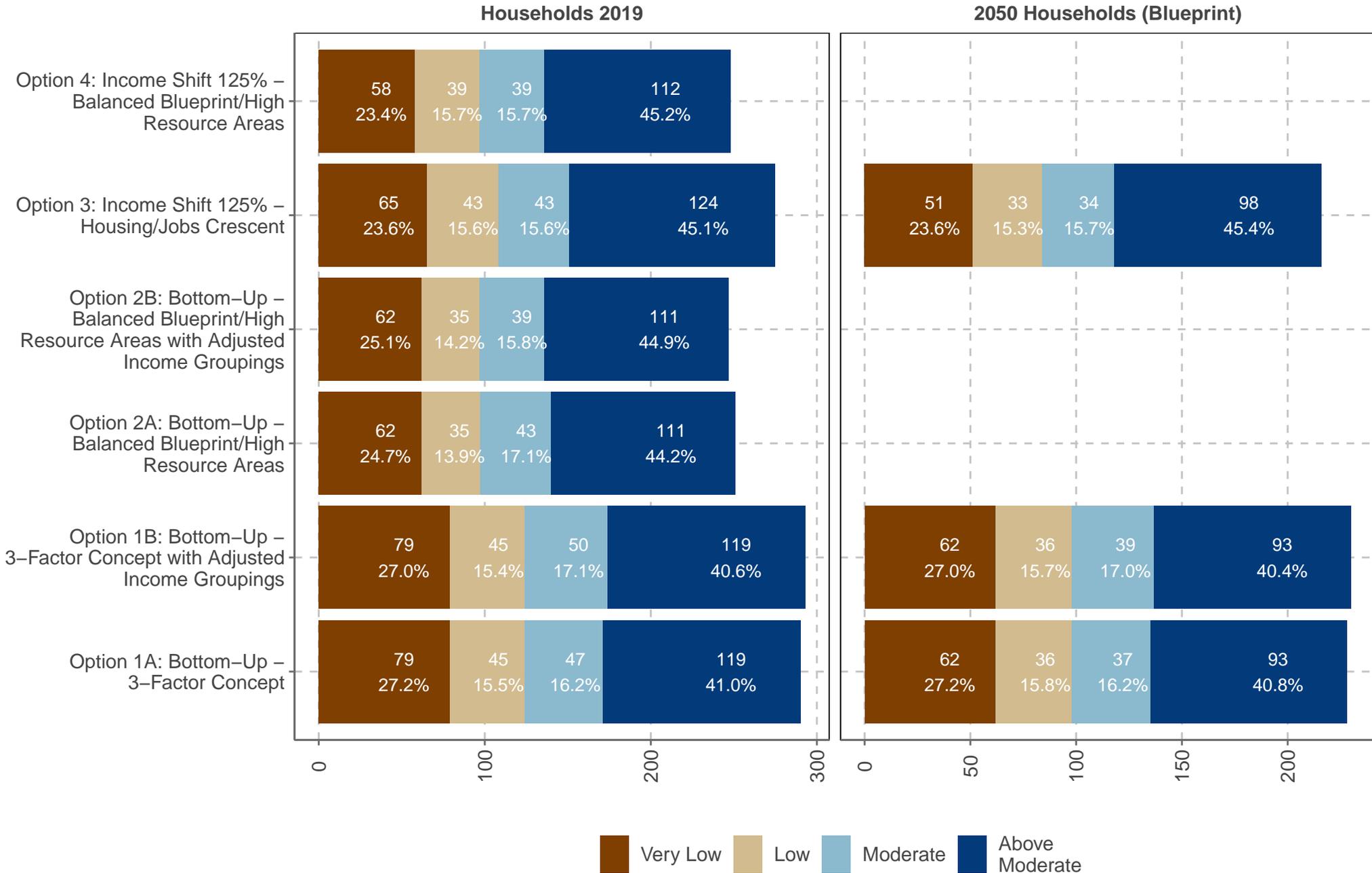
(2019 households: 28619)
(Napa County)

Map shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details. Label shows allocation rounded to nearest 10.



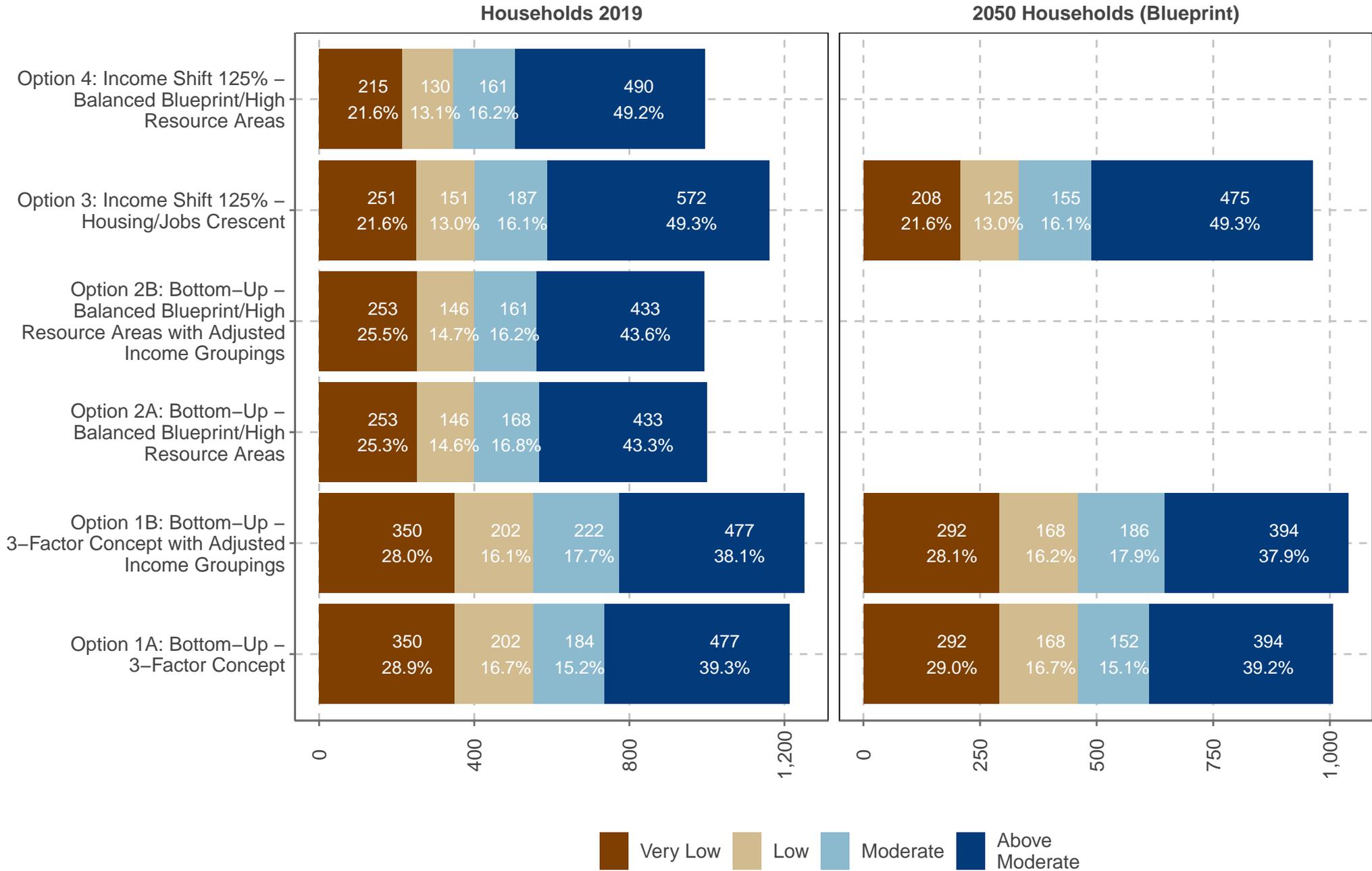
Appendix 4: Potential RHNA Allocation, Income Distribution
St. Helena
(2019 households: 2492)
(Napa County)

Map shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details. Label shows allocation rounded to nearest 10.



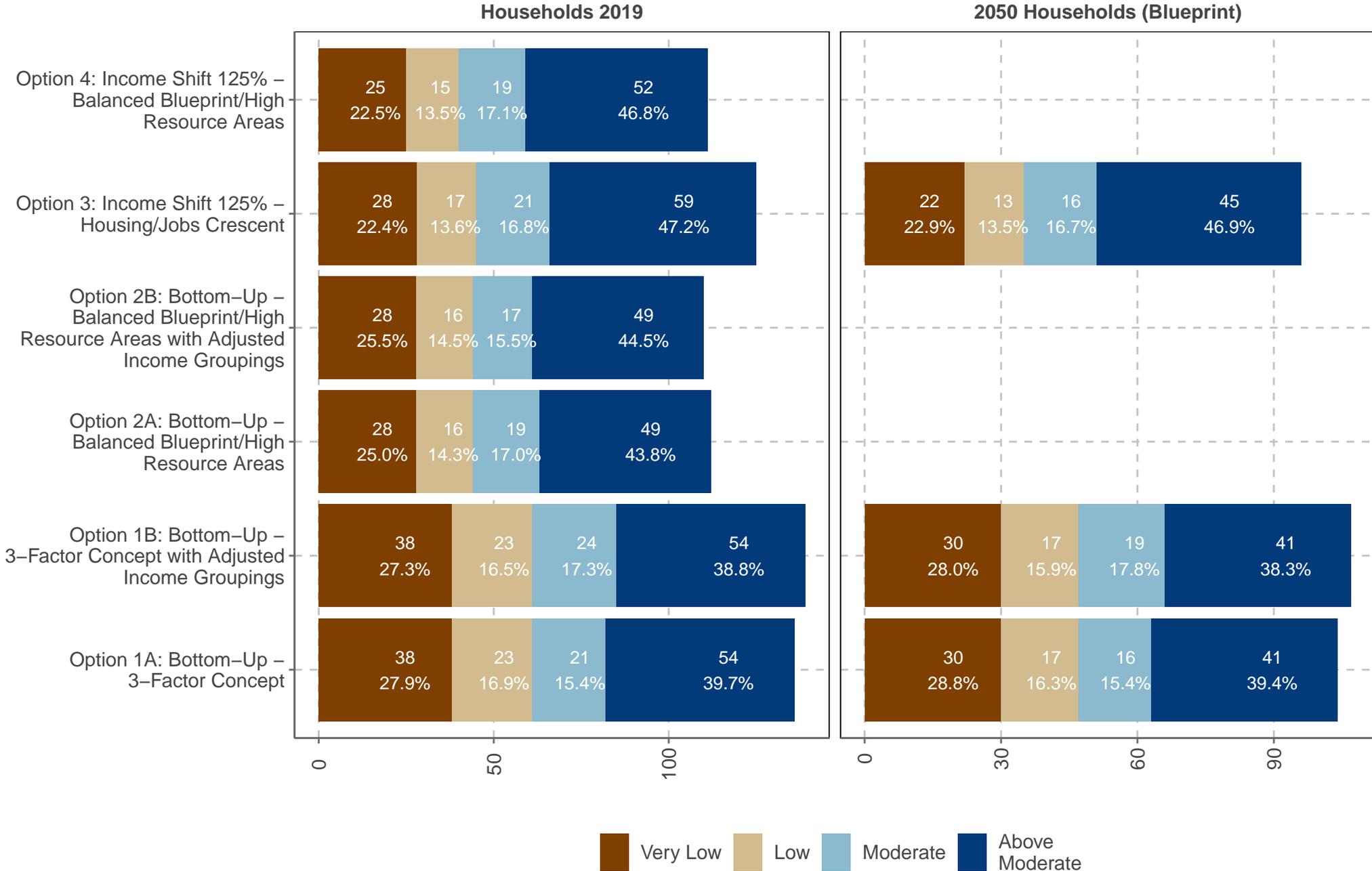
Appendix 4: Potential RHNA Allocation, Income Distribution
Uninc. Napa
(2019 households: 9373)
(Napa County)

Map shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details. Label shows allocation rounded to nearest 10.



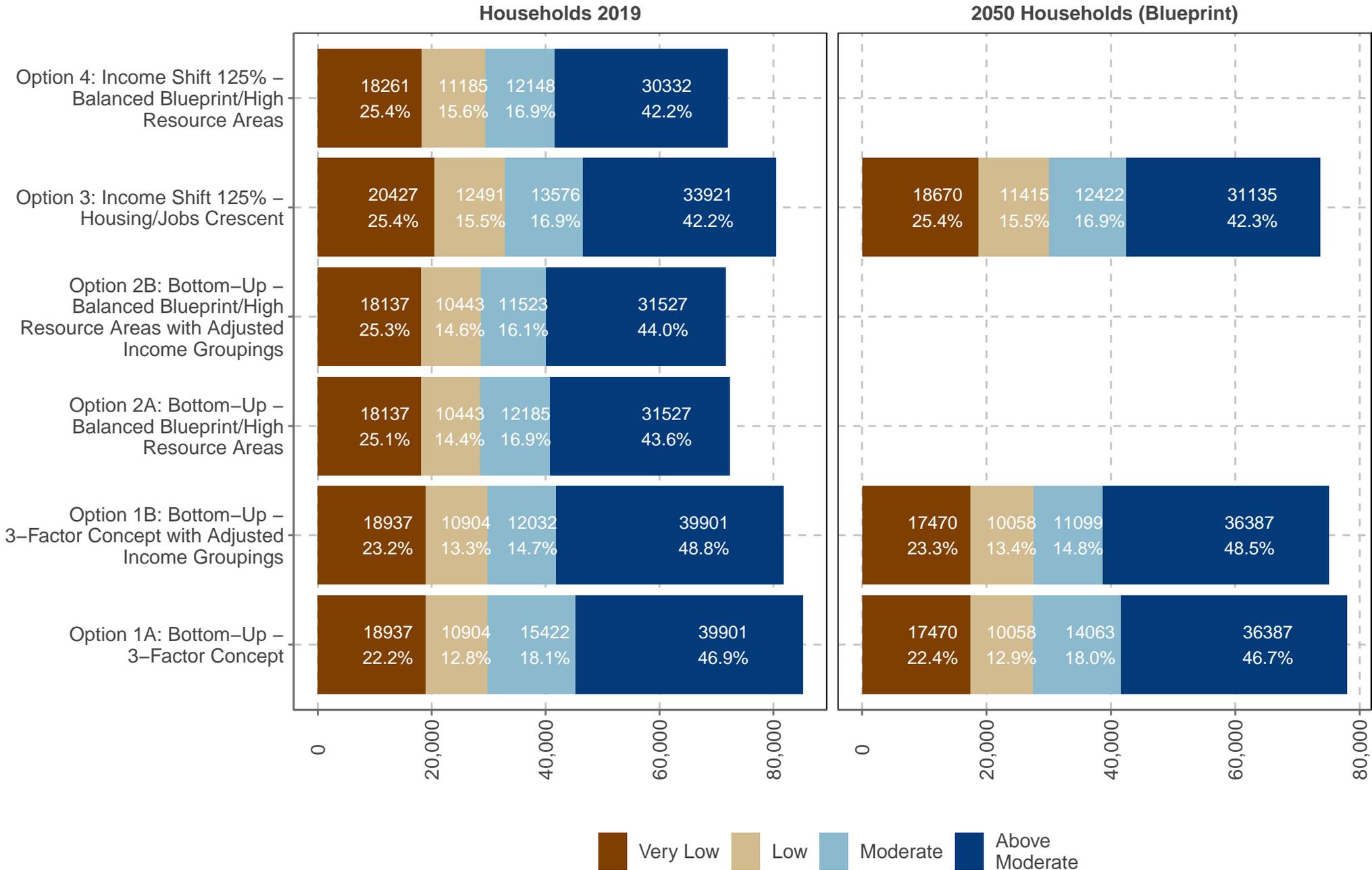
Appendix 4: Potential RHNA Allocation, Income Distribution Yountville (2019 households: 1113) (Napa County)

Map shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details. Label shows allocation rounded to nearest 10.



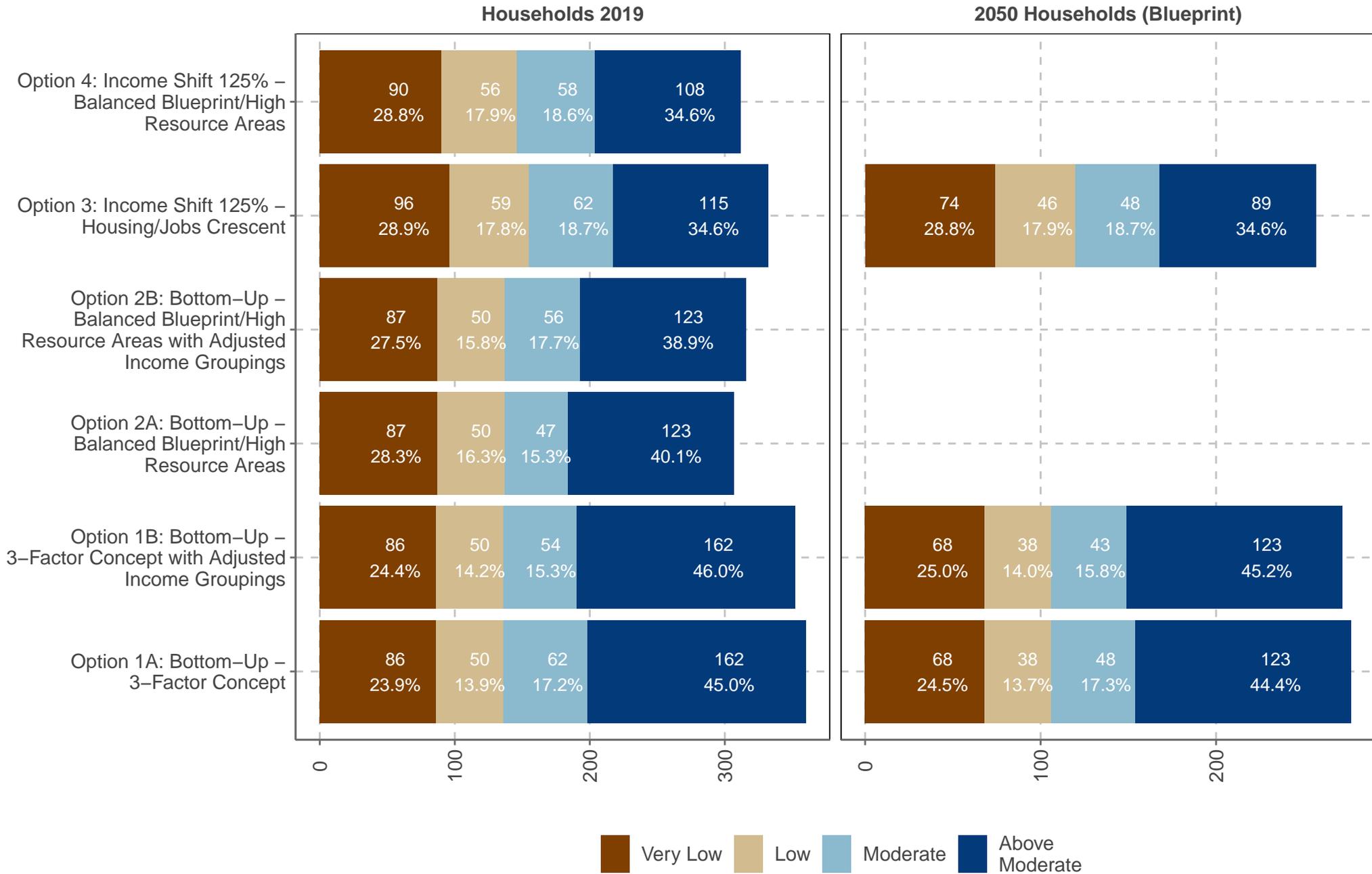
Appendix 4: Potential RHNA Allocation, Income Distribution San Francisco (2019 households: 365197) (San Francisco County)

Map shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details. Label shows allocation rounded to nearest 10.



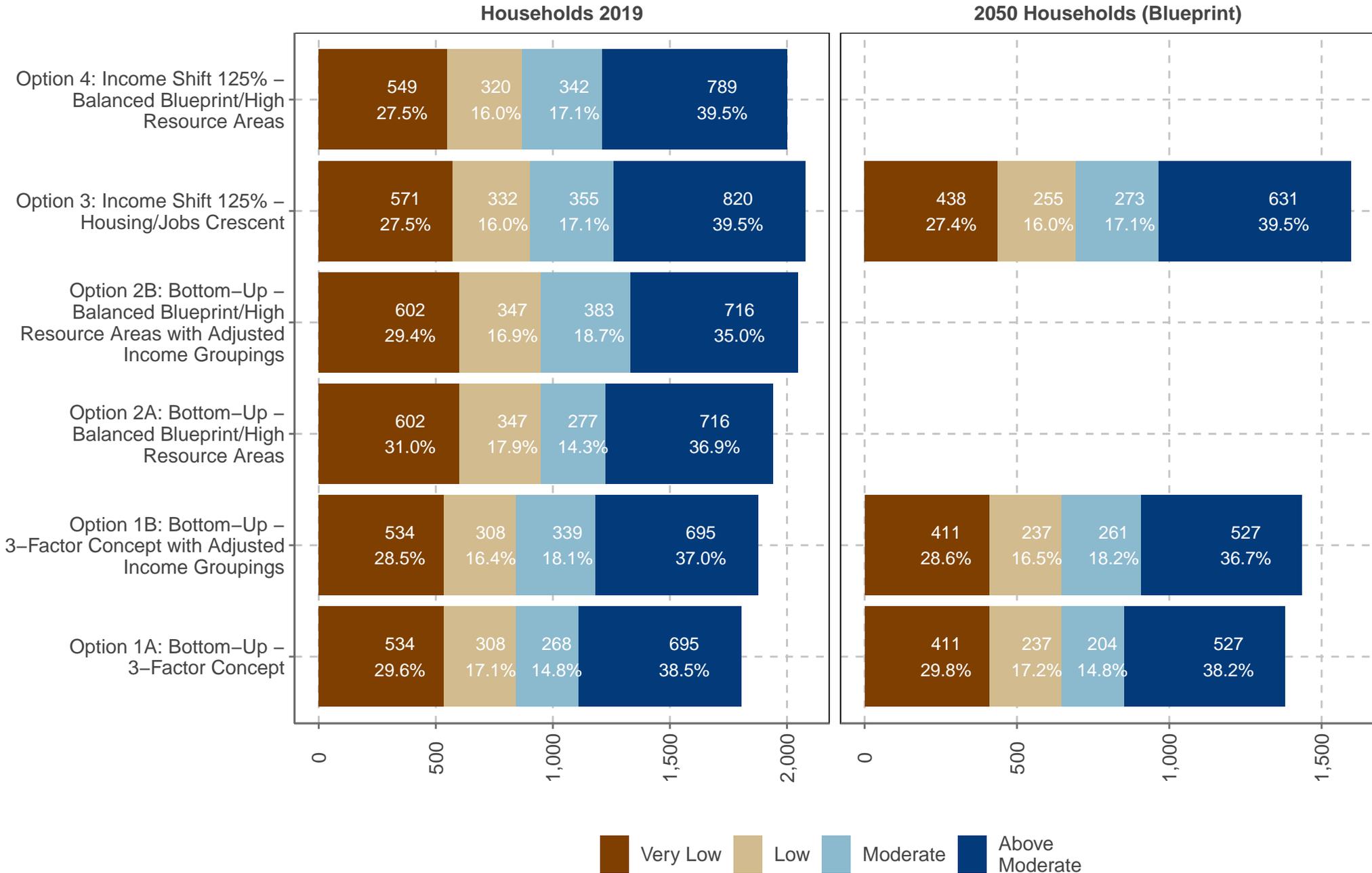
Appendix 4: Potential RHNA Allocation, Income Distribution Atherton (2019 households: 2284) (San Mateo County)

Map shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details. Label shows allocation rounded to nearest 10.



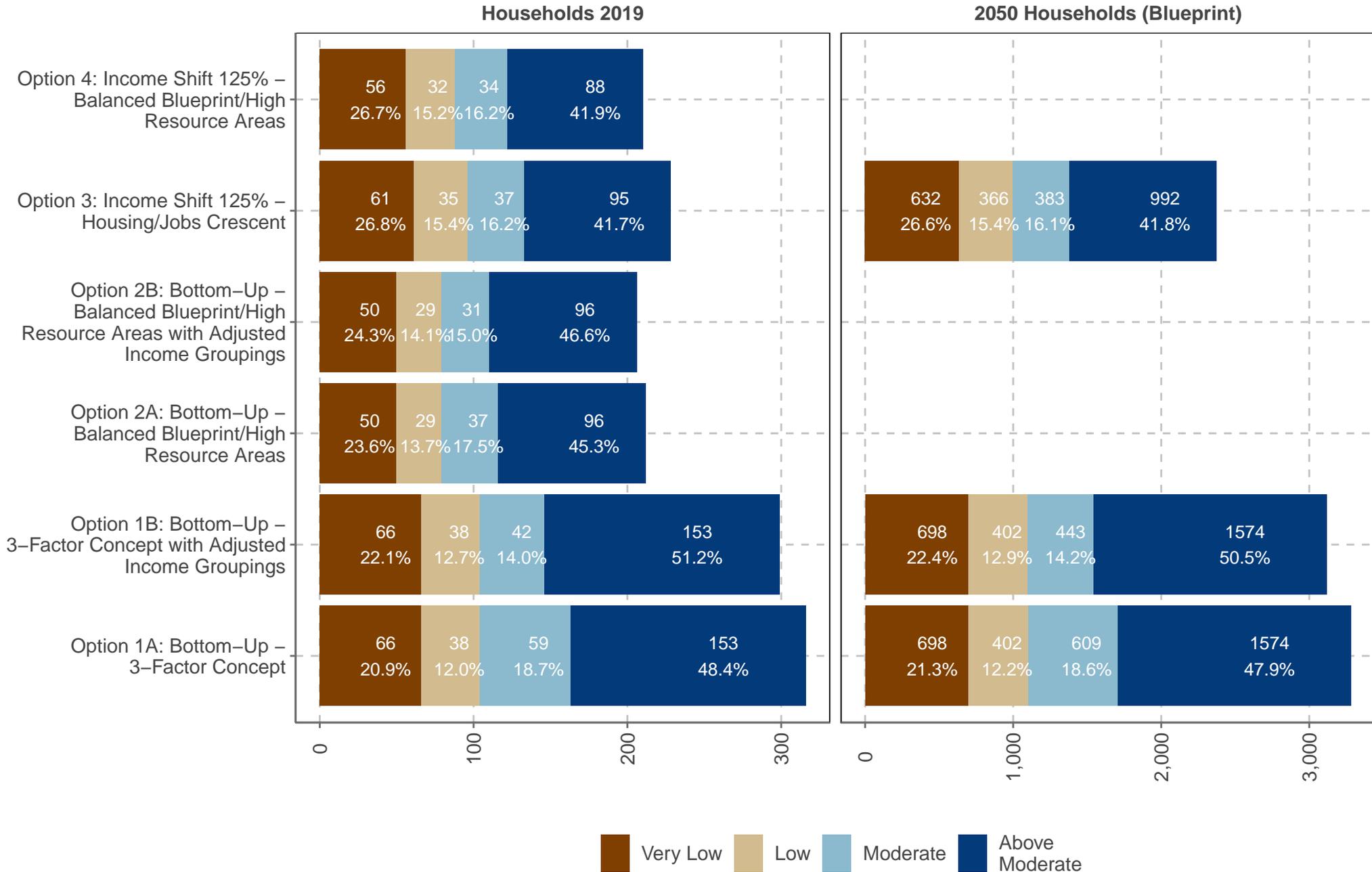
Appendix 4: Potential RHNA Allocation, Income Distribution Belmont (2019 households: 10658) (San Mateo County)

Map shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details. Label shows allocation rounded to nearest 10.



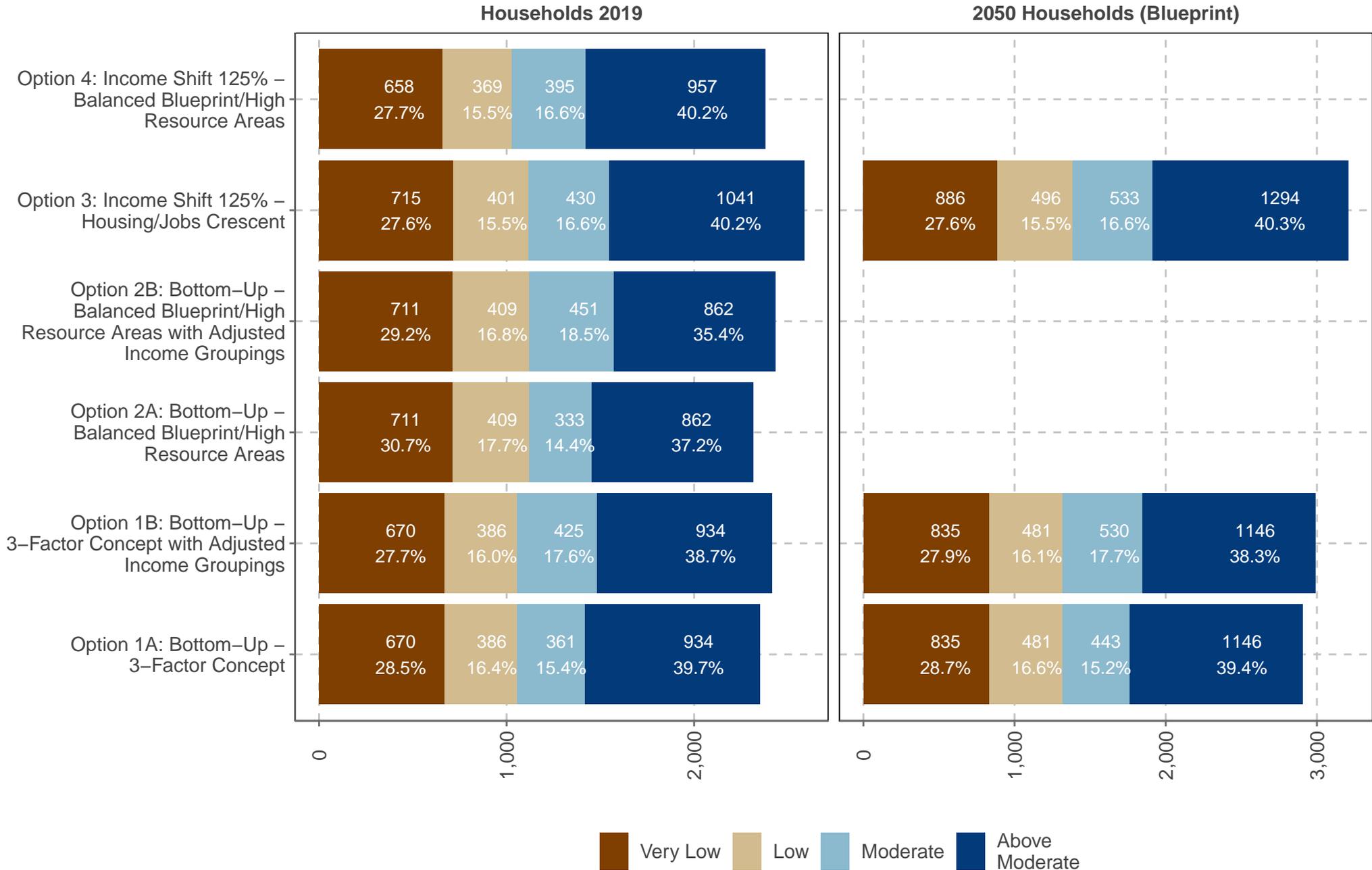
Appendix 4: Potential RHNA Allocation, Income Distribution Brisbane (2019 households: 1913) (San Mateo County)

Map shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details. Label shows allocation rounded to nearest 10.



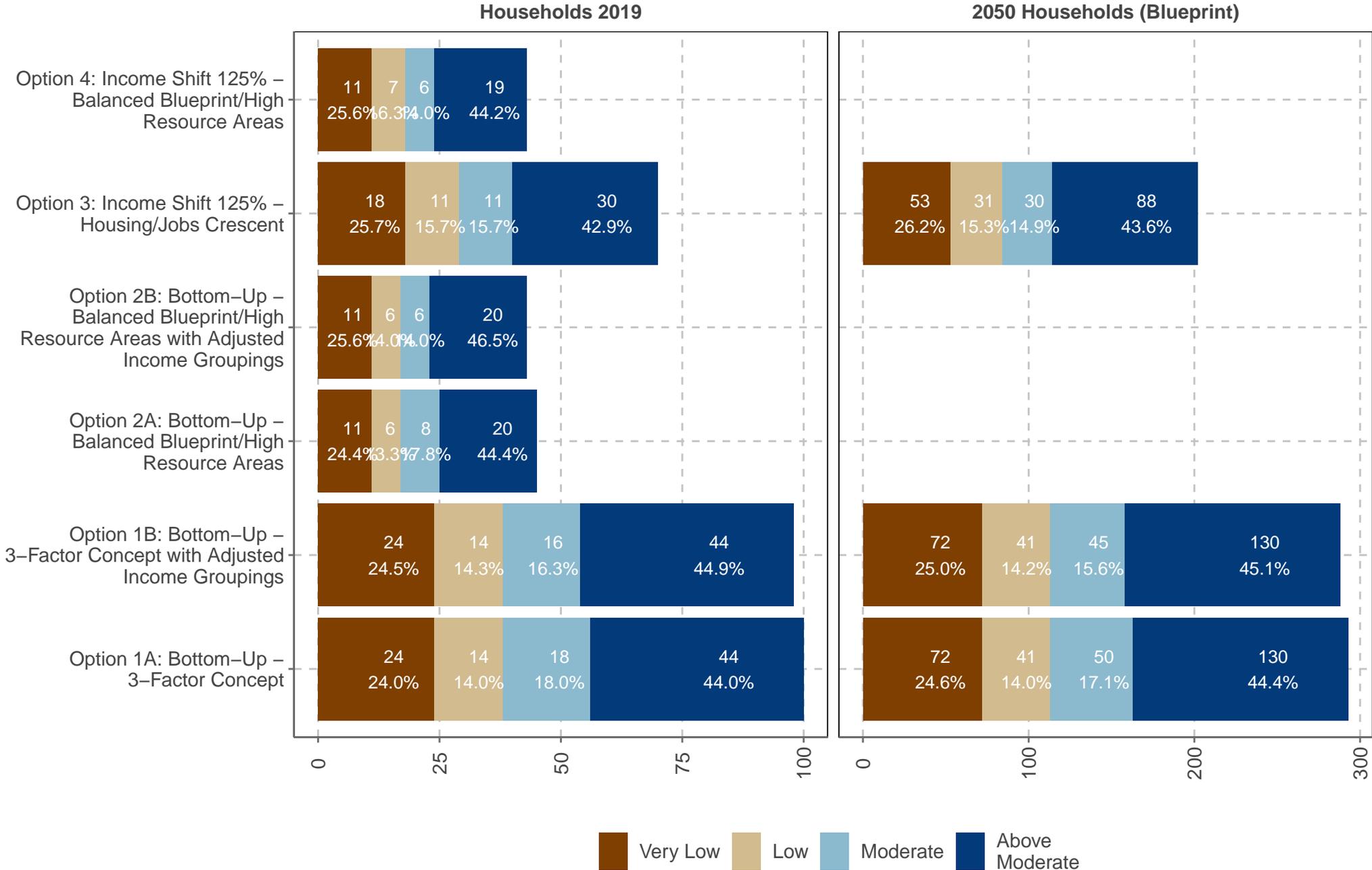
Appendix 4: Potential RHNA Allocation, Income Distribution Burlingame (2019 households: 12465) (San Mateo County)

Map shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details. Label shows allocation rounded to nearest 10.



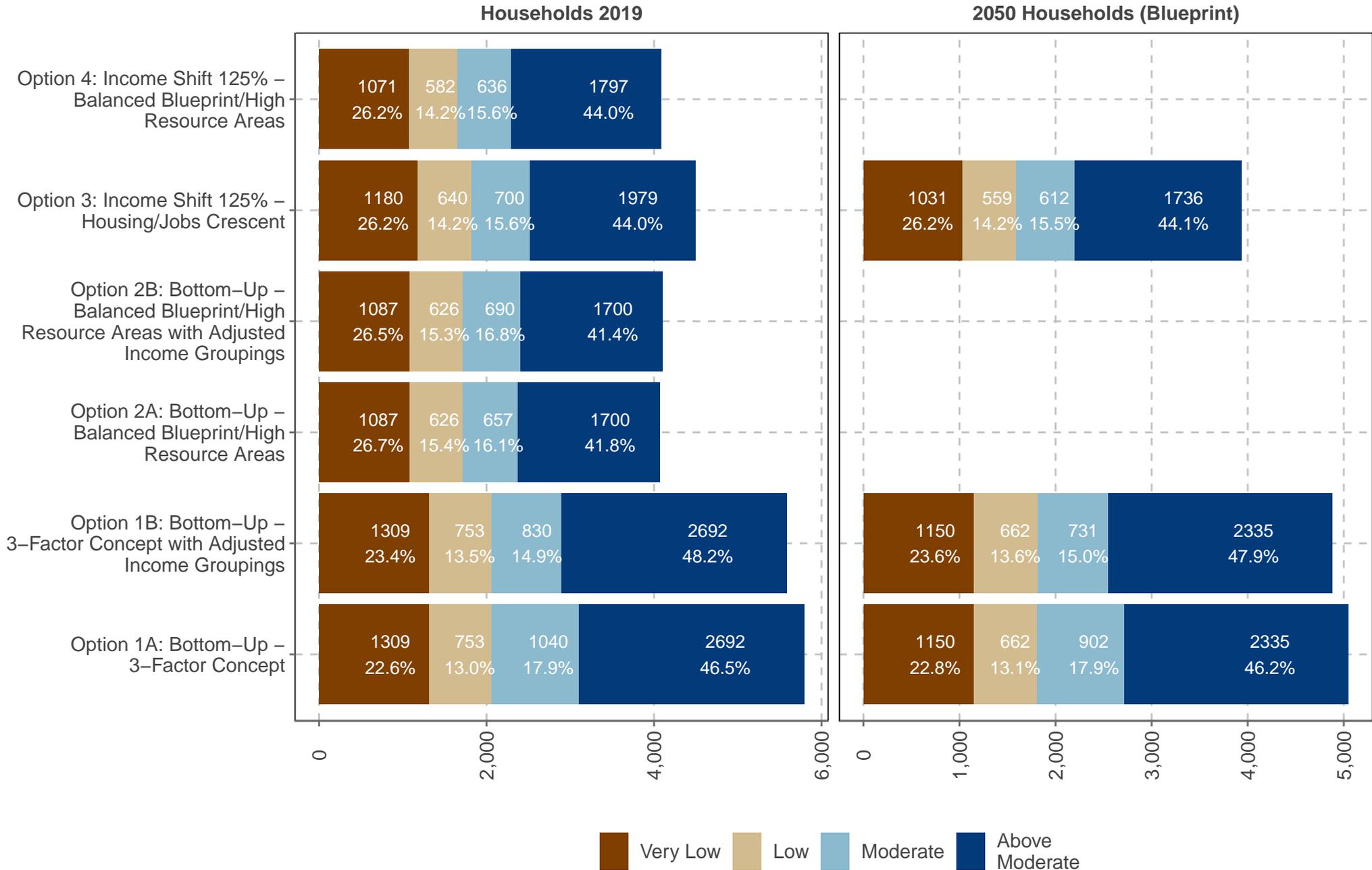
Appendix 4: Potential RHNA Allocation, Income Distribution Colma (2019 households: 435) (San Mateo County)

Map shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details. Label shows allocation rounded to nearest 10.



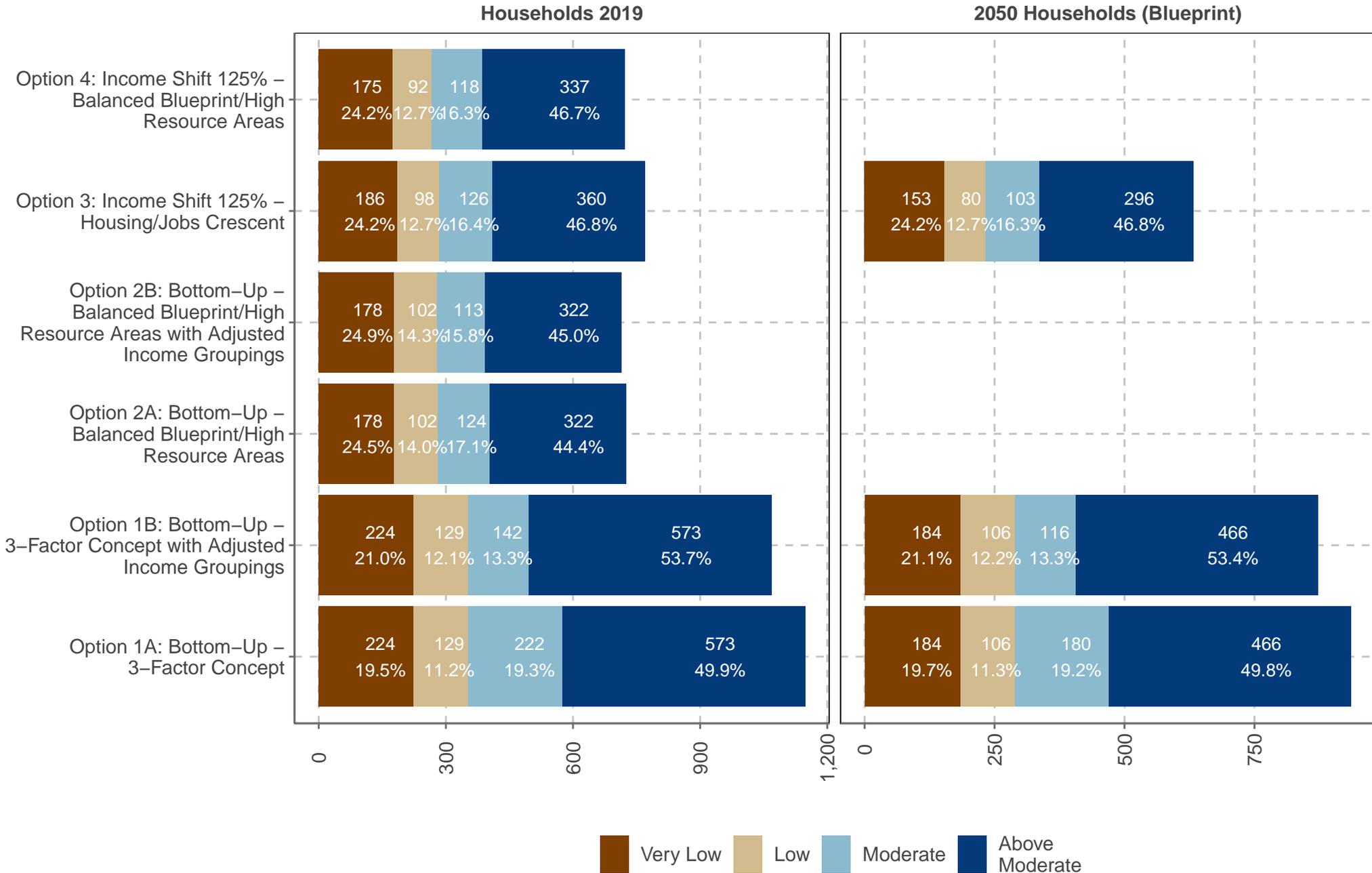
Appendix 4: Potential RHNA Allocation, Income Distribution Daly City (2019 households: 32151) (San Mateo County)

Map shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details. Label shows allocation rounded to nearest 10.



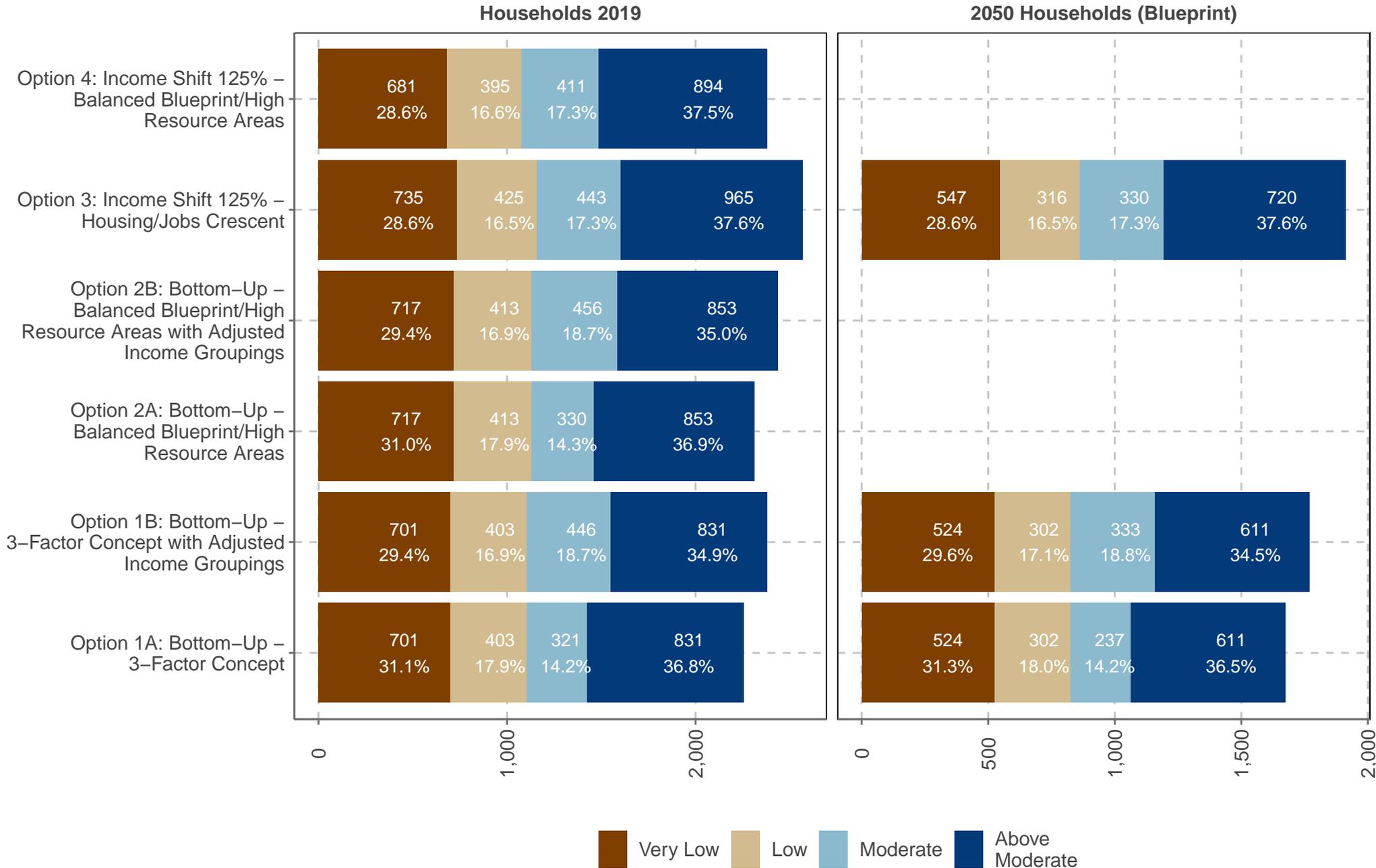
Appendix 4: Potential RHNA Allocation, Income Distribution East Palo Alto (2019 households: 7202) (San Mateo County)

Map shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details. Label shows allocation rounded to nearest 10.



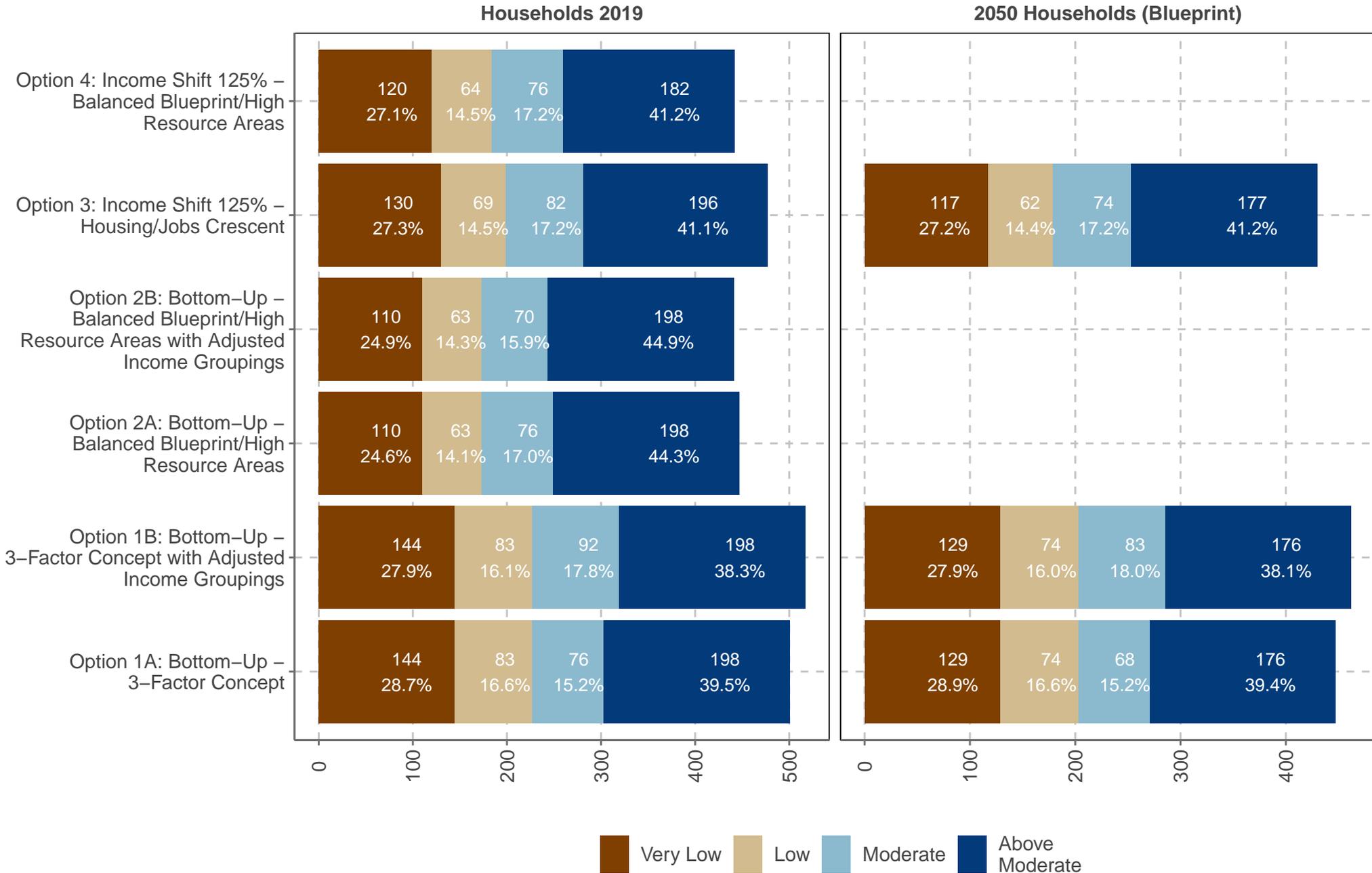
**Appendix 4: Potential RHNA Allocation, Income Distribution
Foster City
(2019 households: 12696)
(San Mateo County)**

Map shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details.
Label shows allocation rounded to nearest 10.



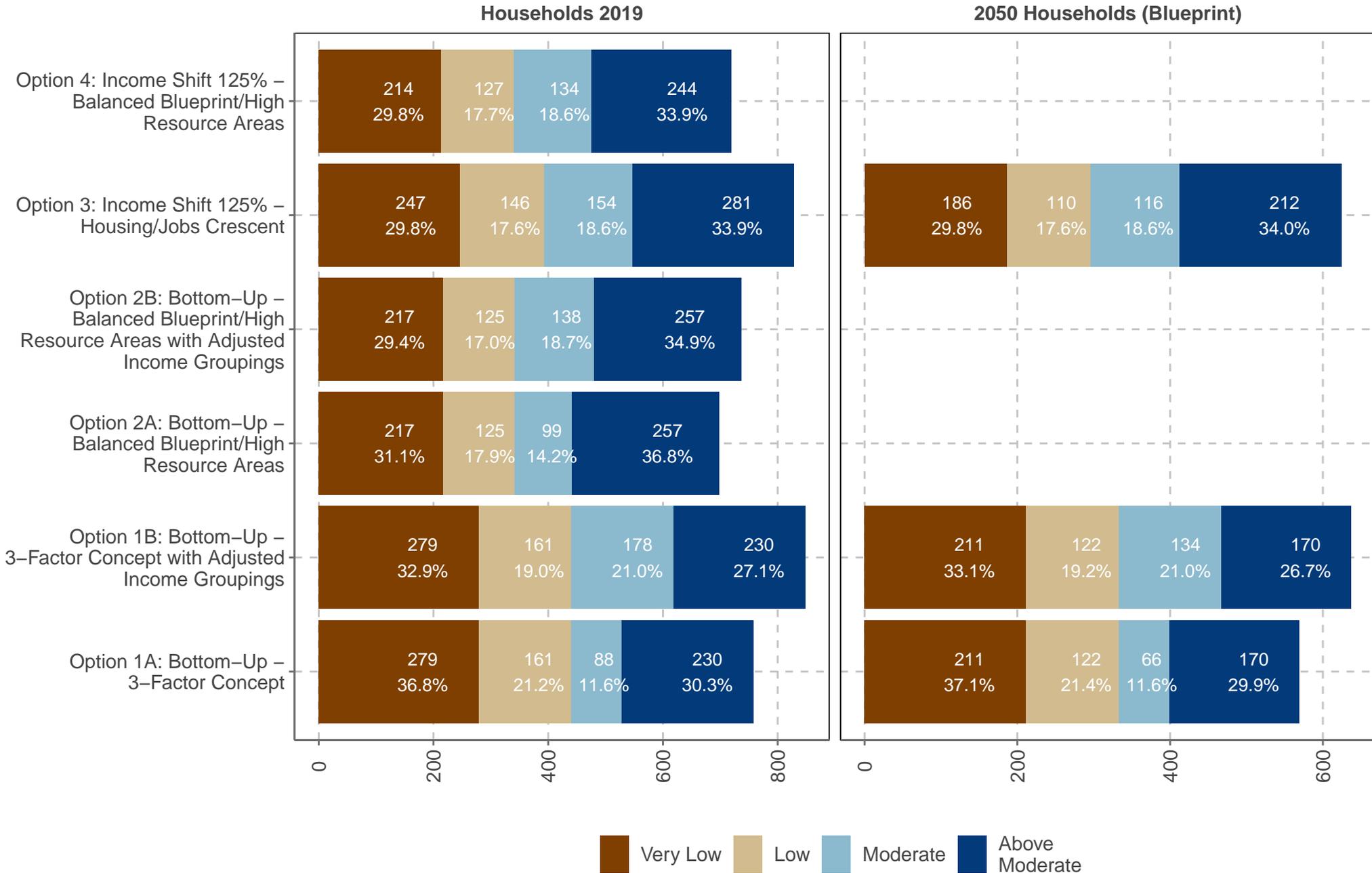
Appendix 4: Potential RHNA Allocation, Income Distribution Half Moon Bay (2019 households: 4434) (San Mateo County)

Map shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details. Label shows allocation rounded to nearest 10.



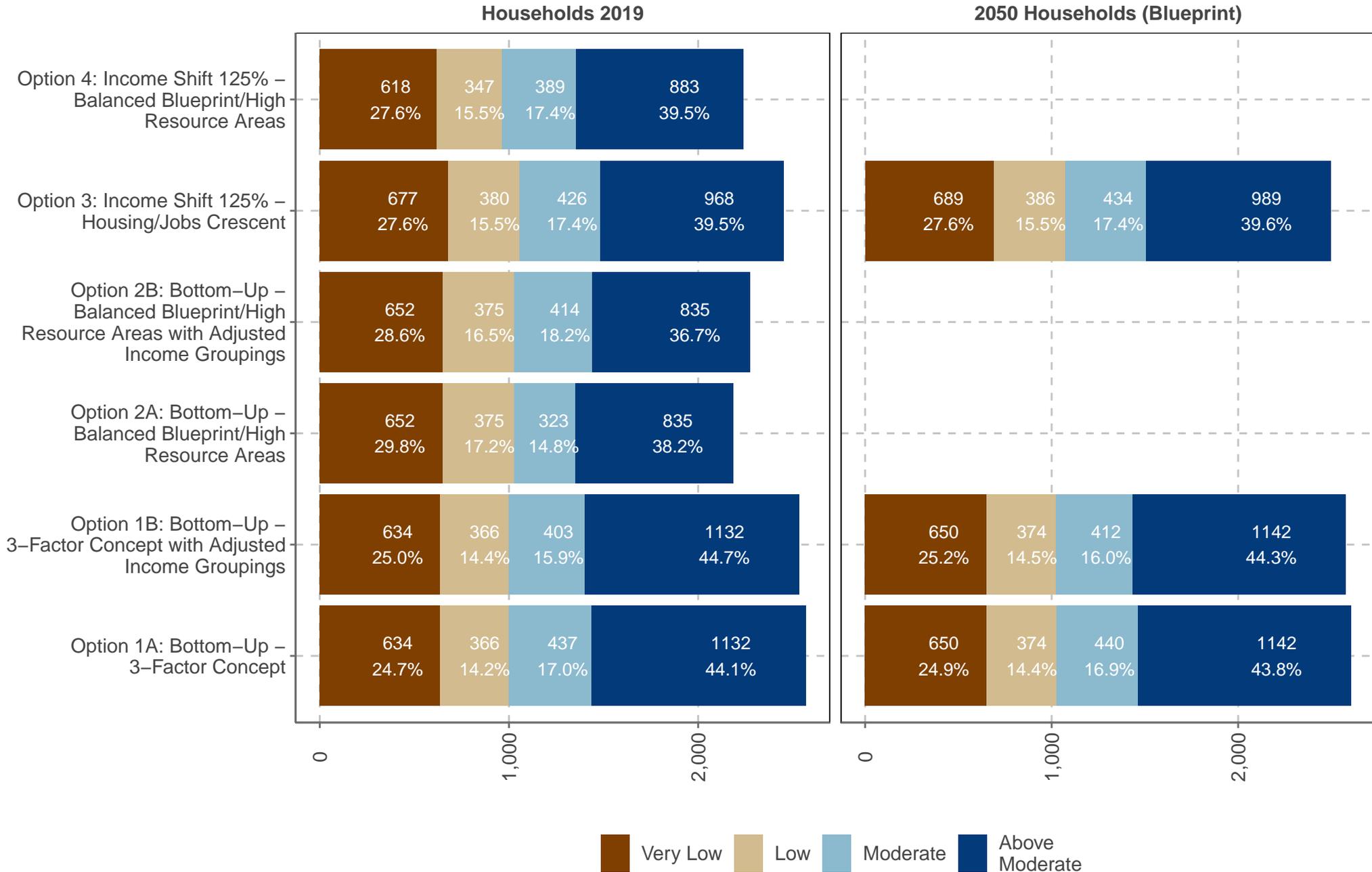
Appendix 4: Potential RHNA Allocation, Income Distribution Hillsborough (2019 households: 3843) (San Mateo County)

Map shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details. Label shows allocation rounded to nearest 10.



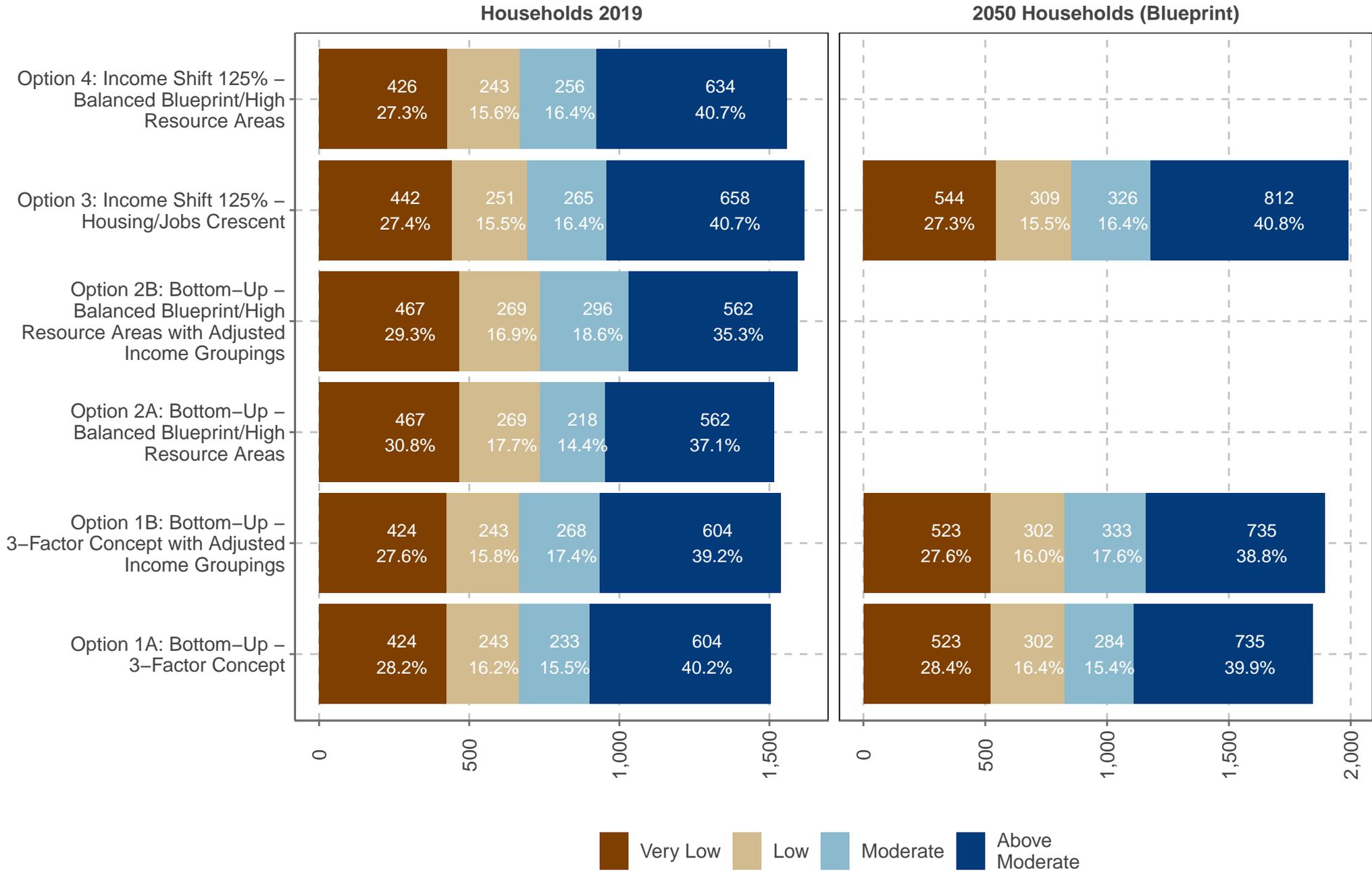
Appendix 4: Potential RHNA Allocation, Income Distribution Menlo Park (2019 households: 13277) (San Mateo County)

Map shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details. Label shows allocation rounded to nearest 10.



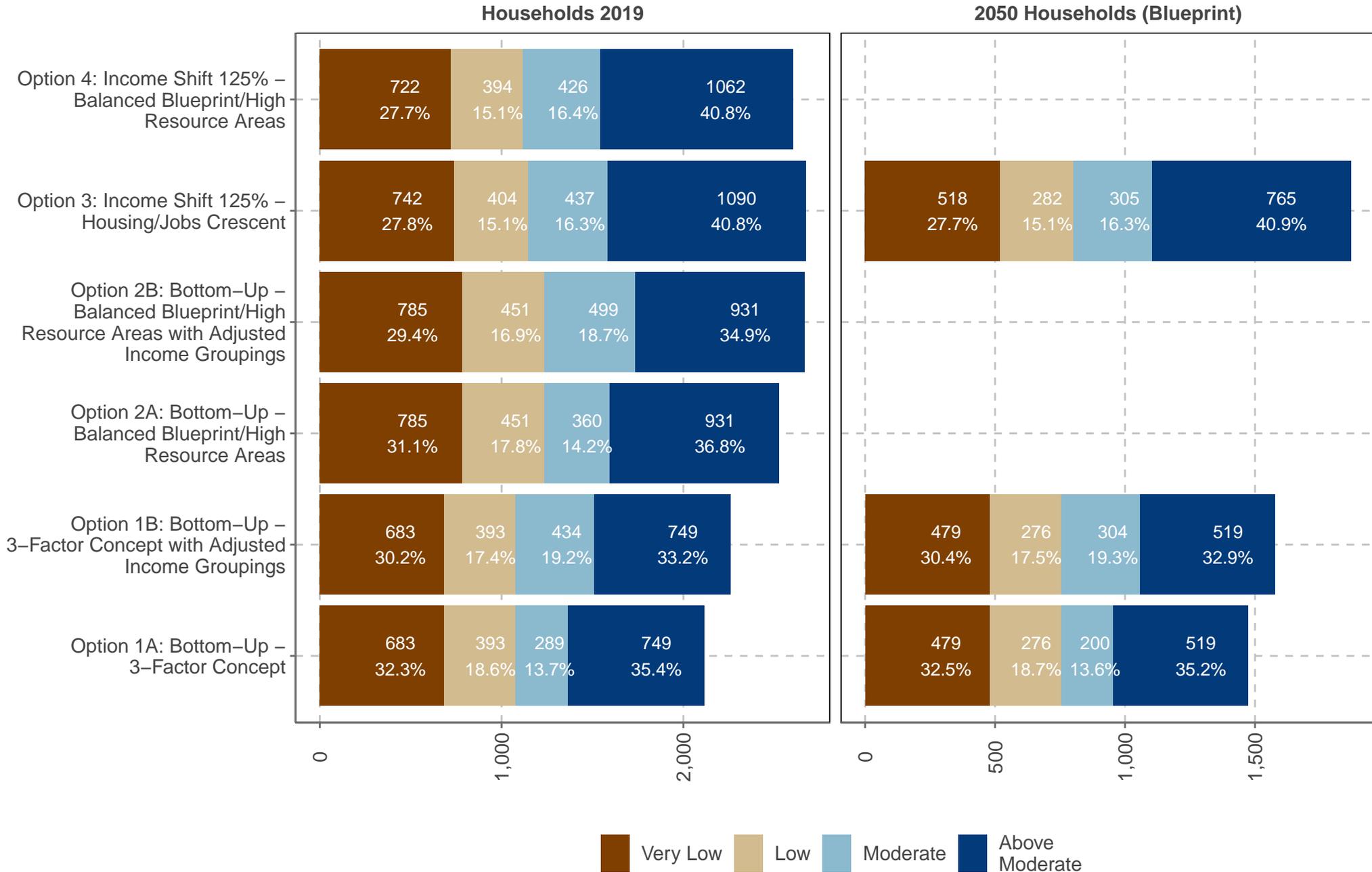
**Appendix 4: Potential RHNA Allocation, Income Distribution
Millbrae
(2019 households: 8241)
(San Mateo County)**

Map shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details. Label shows allocation rounded to nearest 10.



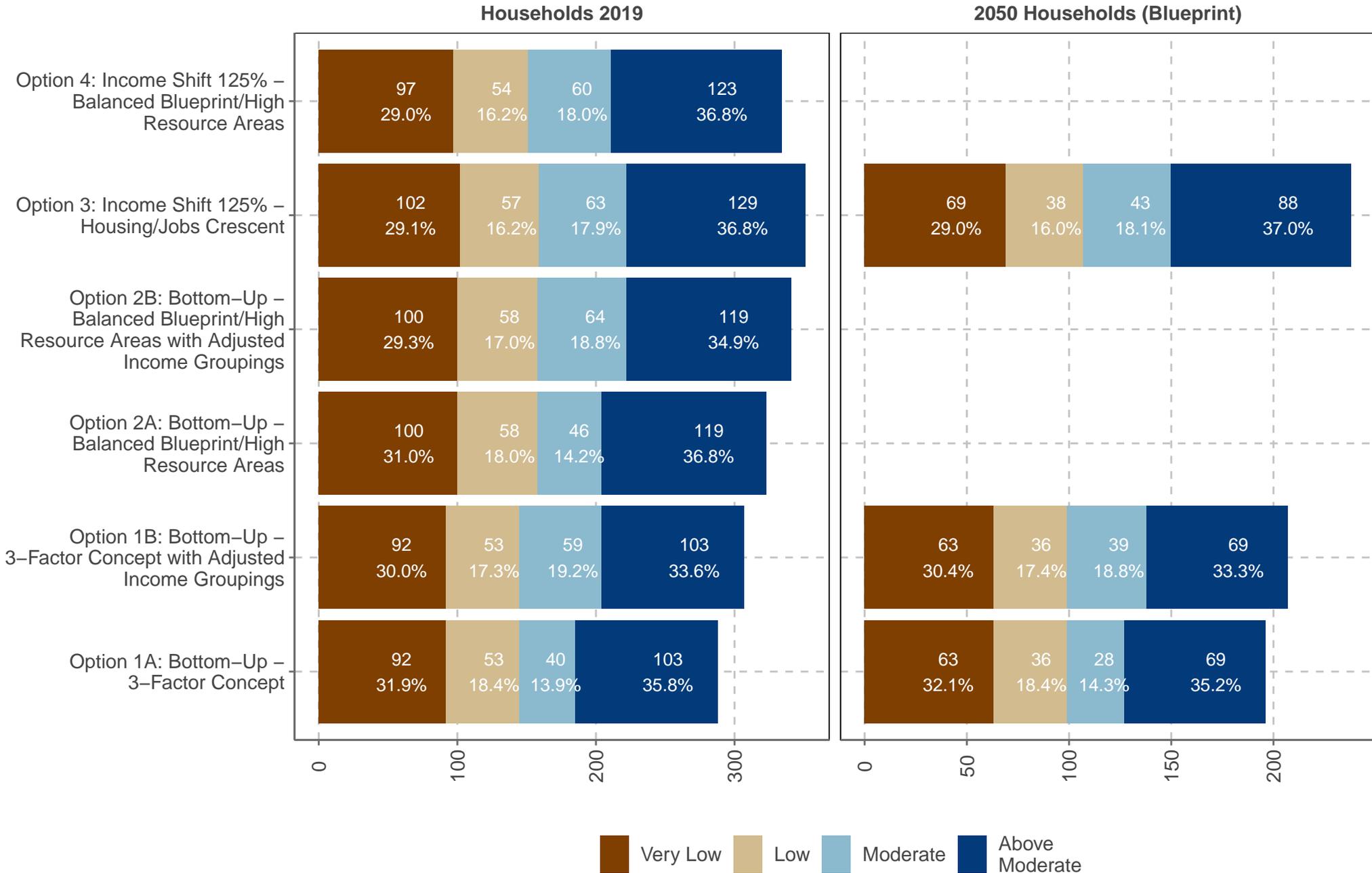
Appendix 4: Potential RHNA Allocation, Income Distribution Pacifica (2019 households: 13894) (San Mateo County)

Map shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details. Label shows allocation rounded to nearest 10.



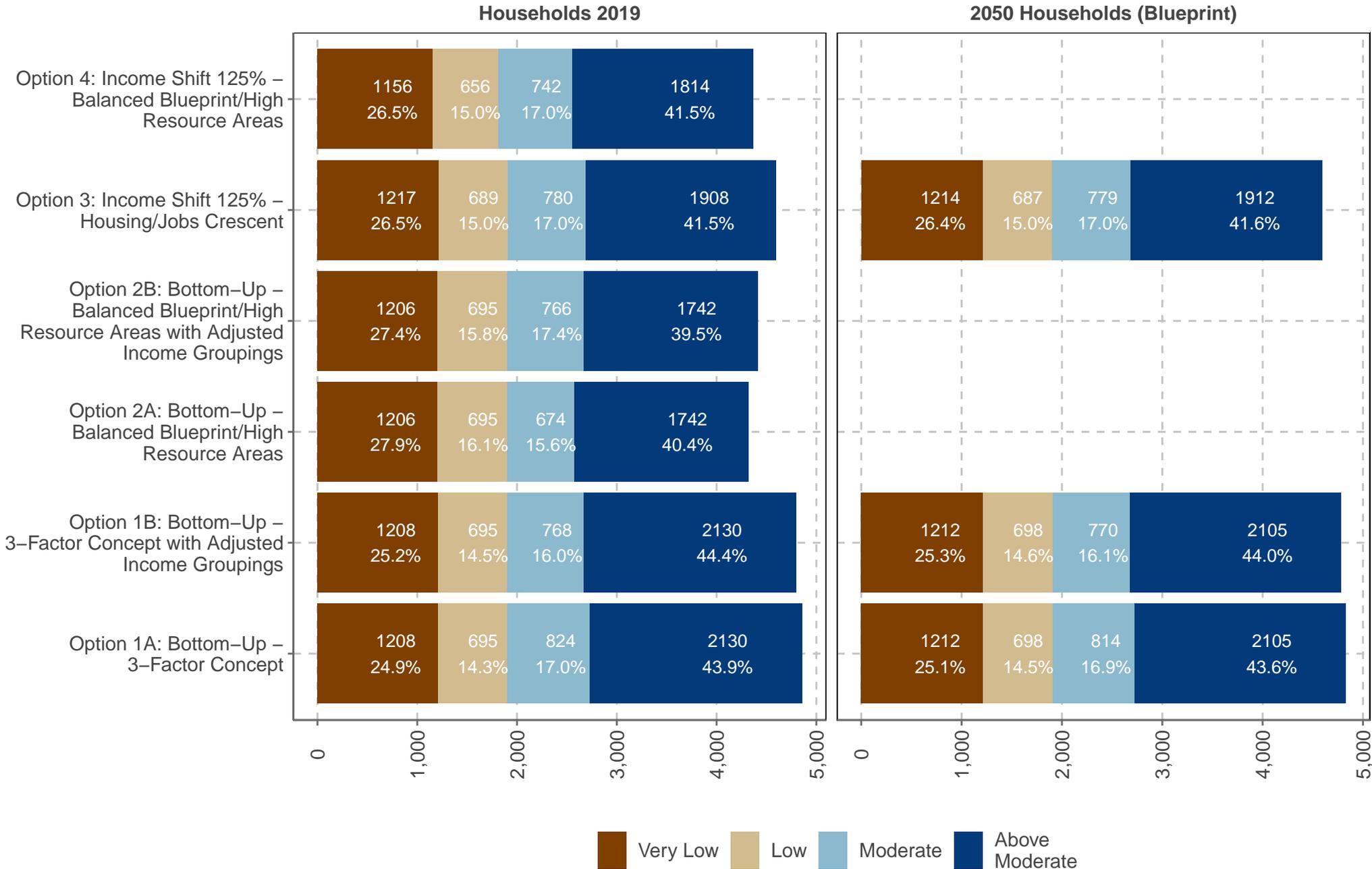
Appendix 4: Potential RHNA Allocation, Income Distribution Portola Valley (2019 households: 1789) (San Mateo County)

Map shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details. Label shows allocation rounded to nearest 10.



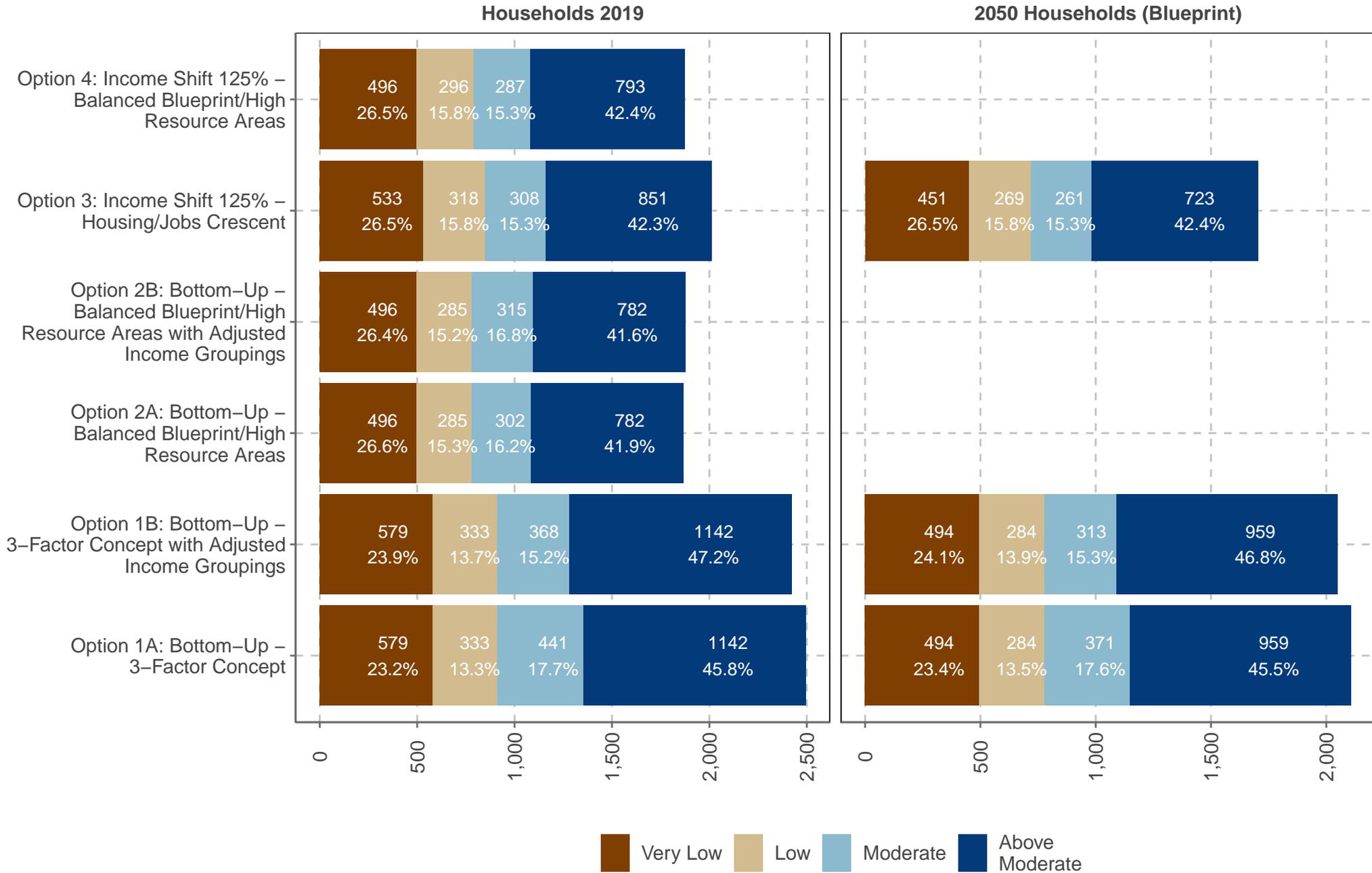
Appendix 4: Potential RHNA Allocation, Income Distribution Redwood City (2019 households: 29842) (San Mateo County)

Map shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details.
Label shows allocation rounded to nearest 10.



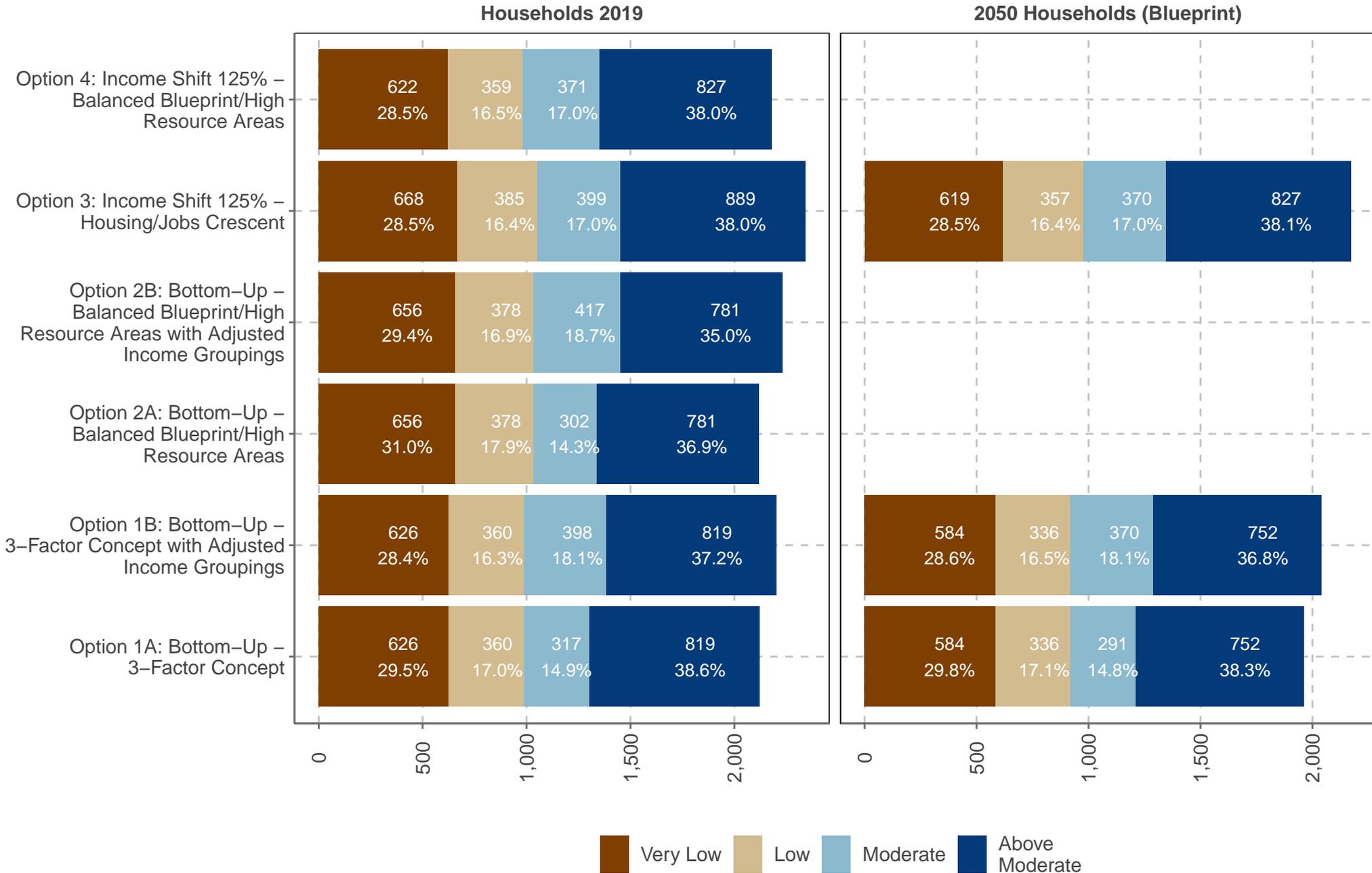
Appendix 4: Potential RHNA Allocation, Income Distribution San Bruno (2019 households: 15502) (San Mateo County)

Map shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details. Label shows allocation rounded to nearest 10.



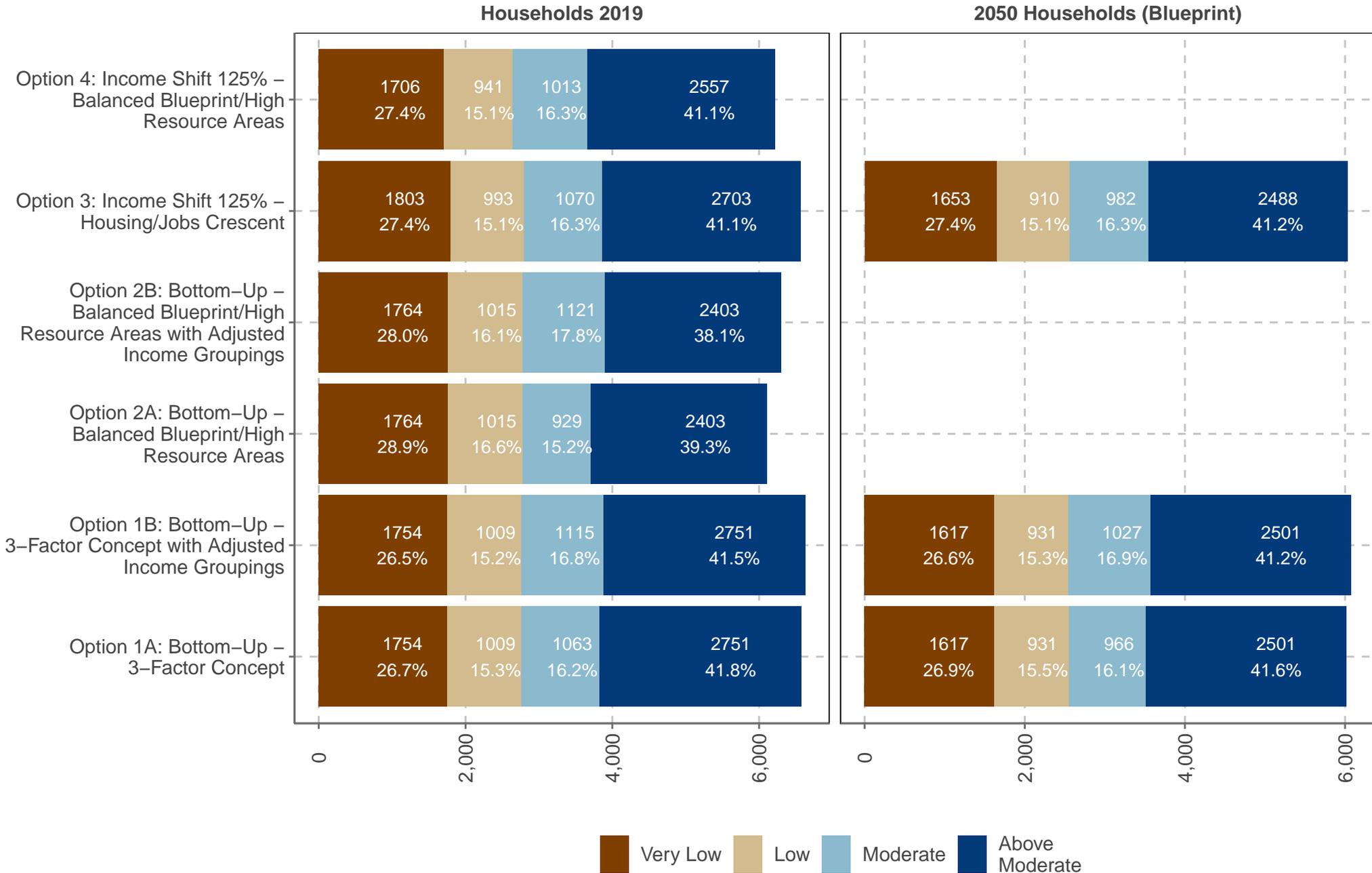
**Appendix 4: Potential RHNA Allocation, Income Distribution
San Carlos
(2019 households: 11590)
(San Mateo County)**

Map shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details. Label shows allocation rounded to nearest 10.



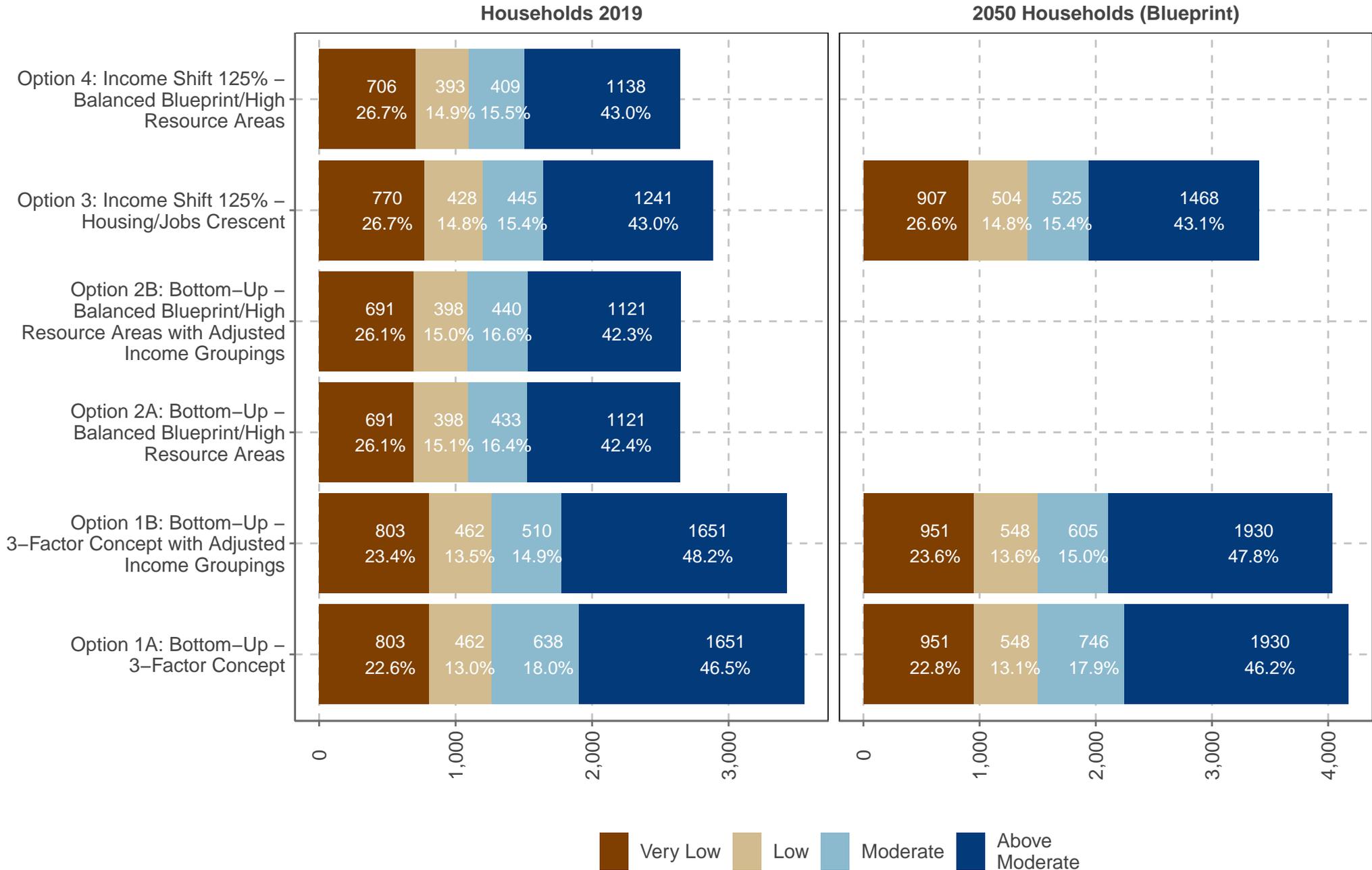
Appendix 4: Potential RHNA Allocation, Income Distribution
San Mateo
(2019 households: 39428)
(San Mateo County)

Map shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details.
 Label shows allocation rounded to nearest 10.



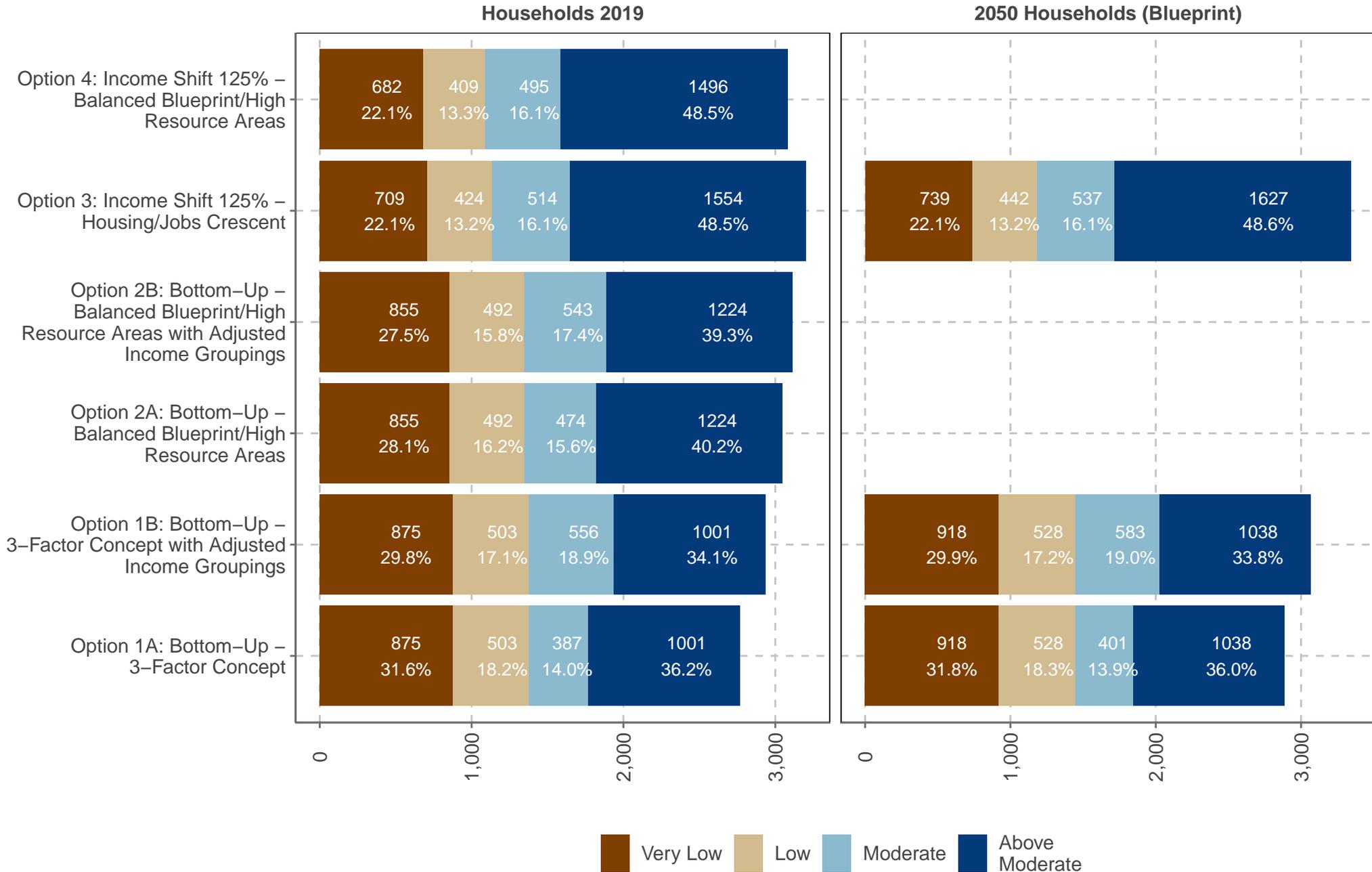
Appendix 4: Potential RHNA Allocation, Income Distribution South San Francisco (2019 households: 21147) (San Mateo County)

Map shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details. Label shows allocation rounded to nearest 10.



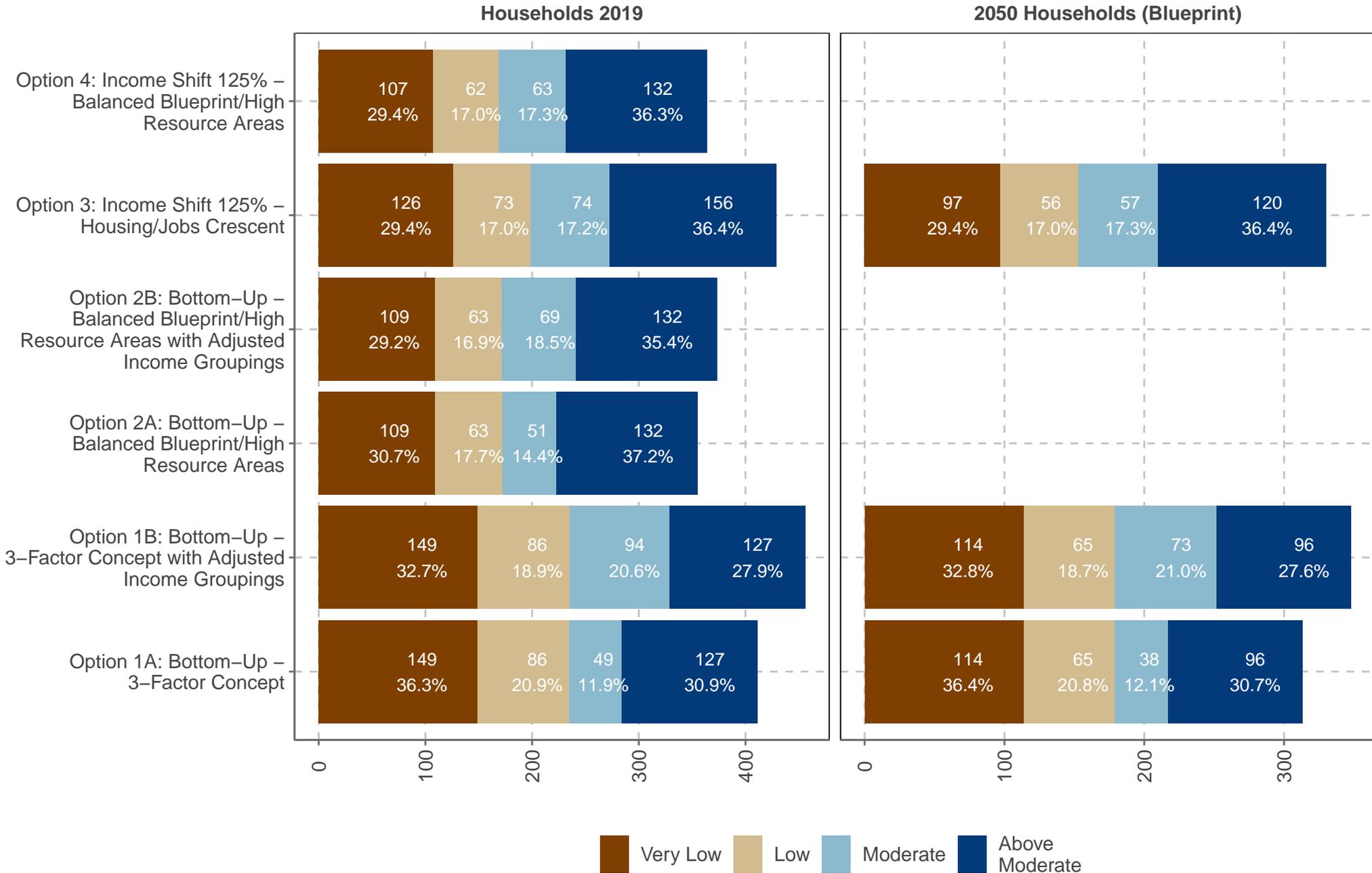
Appendix 4: Potential RHNA Allocation, Income Distribution
Uninc. San Mateo
(2019 households: 21415)
(San Mateo County)

Map shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details. Label shows allocation rounded to nearest 10.



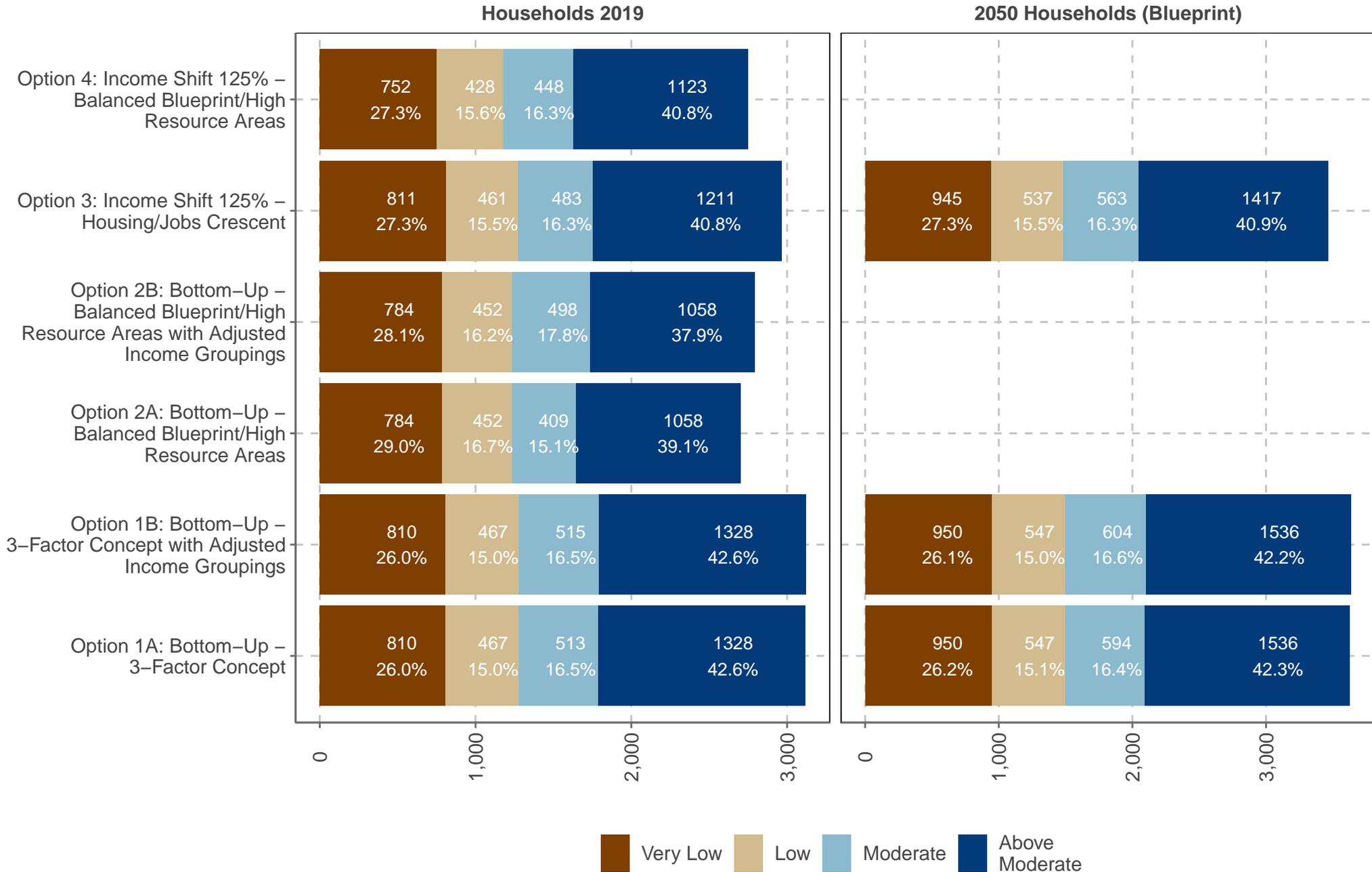
Appendix 4: Potential RHNA Allocation, Income Distribution Woodside (2019 households: 2011) (San Mateo County)

Map shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details. Label shows allocation rounded to nearest 10.



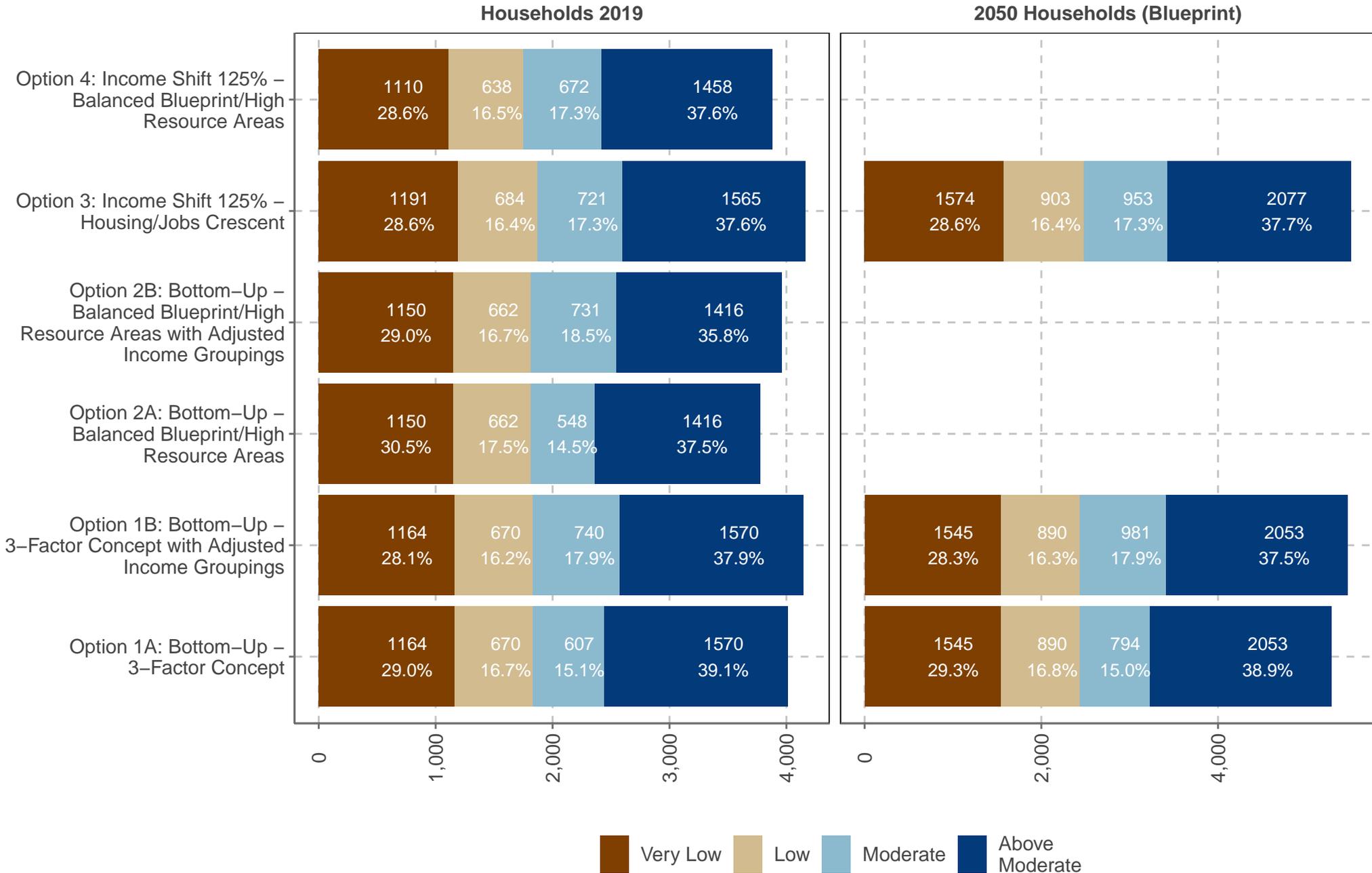
Appendix 4: Potential RHNA Allocation, Income Distribution Campbell (2019 households: 17177) (Santa Clara County)

Map shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details. Label shows allocation rounded to nearest 10.



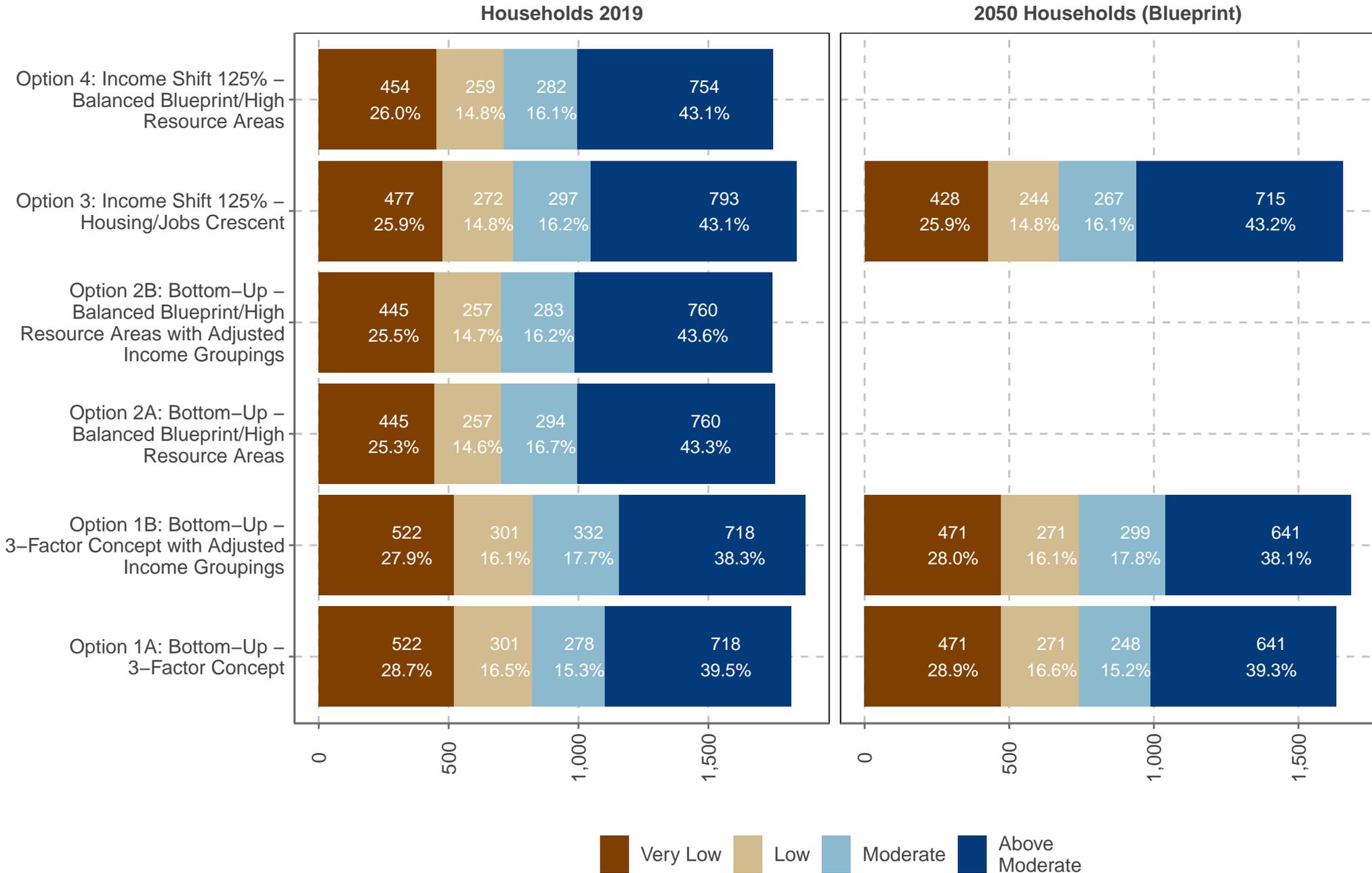
Appendix 4: Potential RHNA Allocation, Income Distribution Cupertino (2019 households: 20035) (Santa Clara County)

Map shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details.
Label shows allocation rounded to nearest 10.



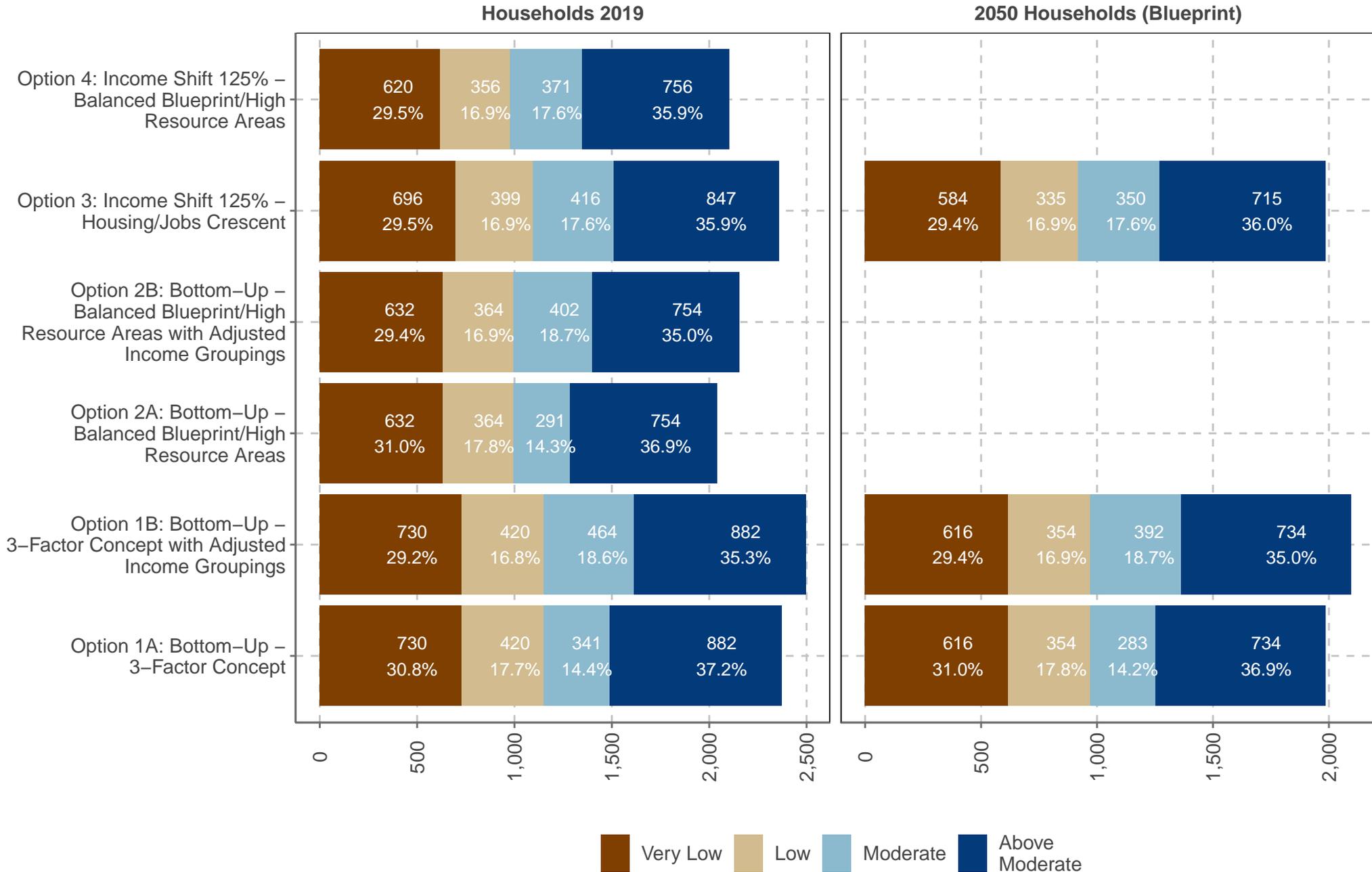
Appendix 4: Potential RHNA Allocation, Income Distribution Gilroy (2019 households: 15725) (Santa Clara County)

Map shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details. Label shows allocation rounded to nearest 10.



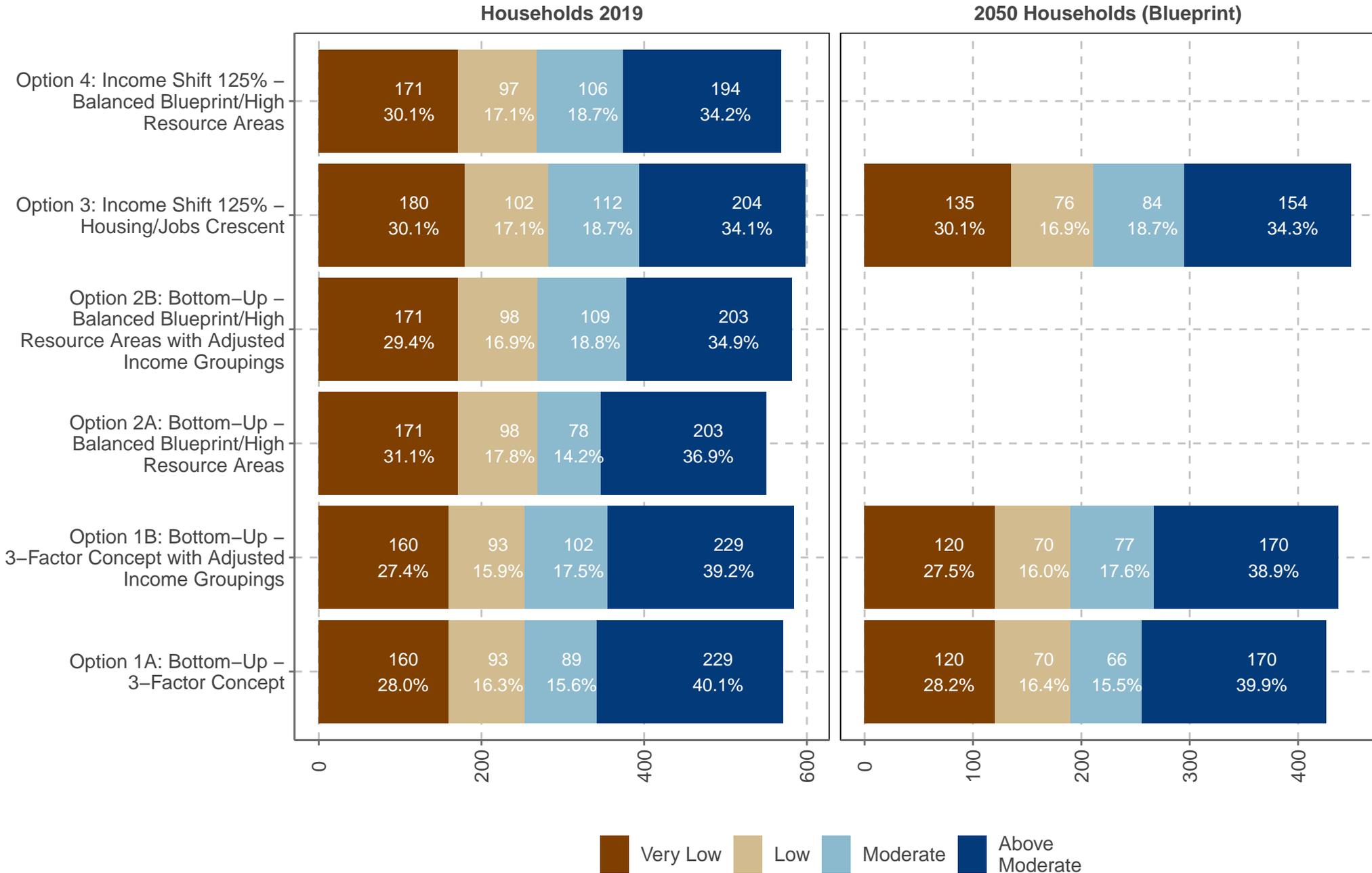
Appendix 4: Potential RHNA Allocation, Income Distribution Los Altos (2019 households: 11181) (Santa Clara County)

Map shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details. Label shows allocation rounded to nearest 10.



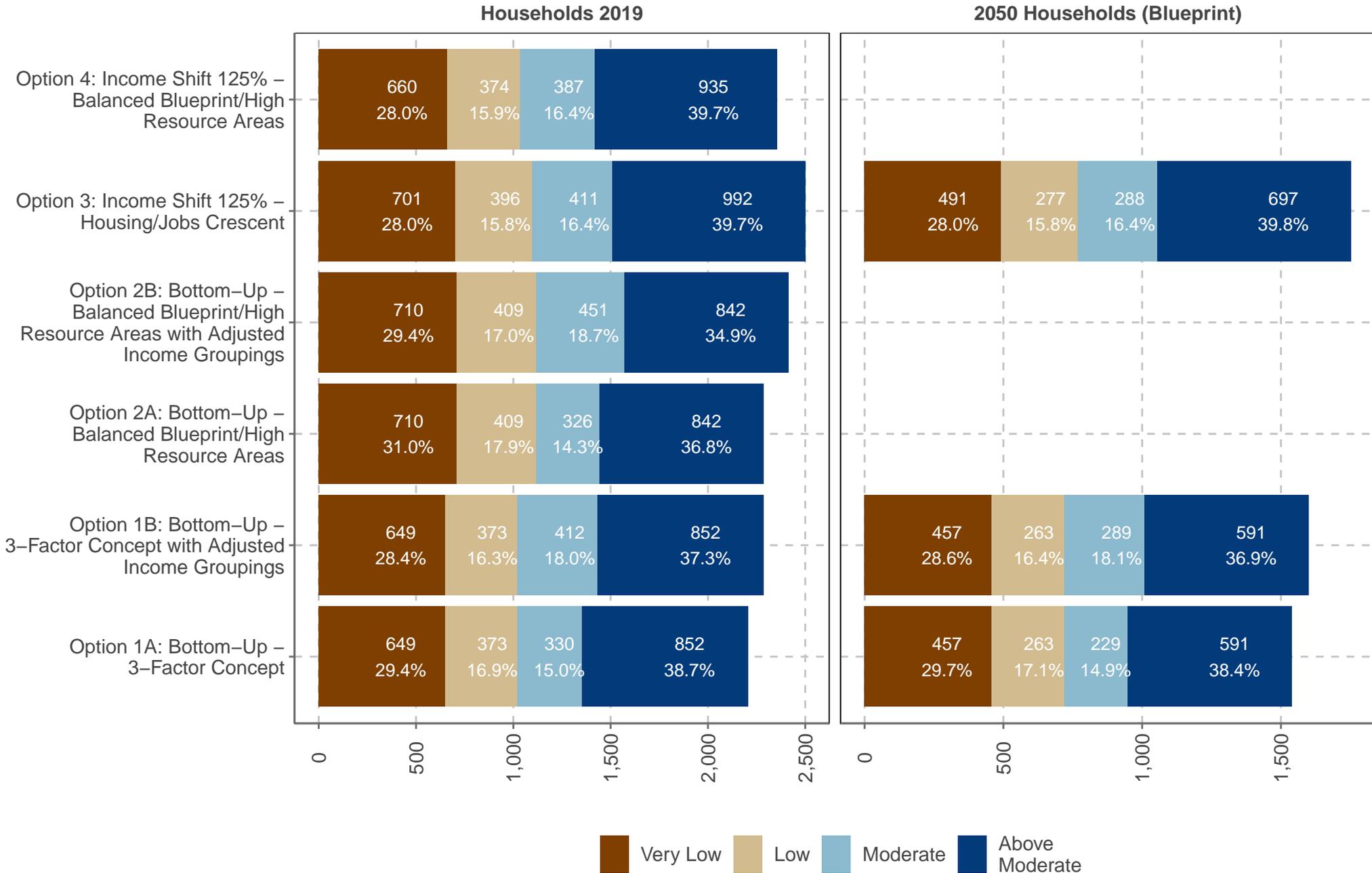
Appendix 4: Potential RHNA Allocation, Income Distribution Los Altos Hills (2019 households: 3034) (Santa Clara County)

Map shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details. Label shows allocation rounded to nearest 10.



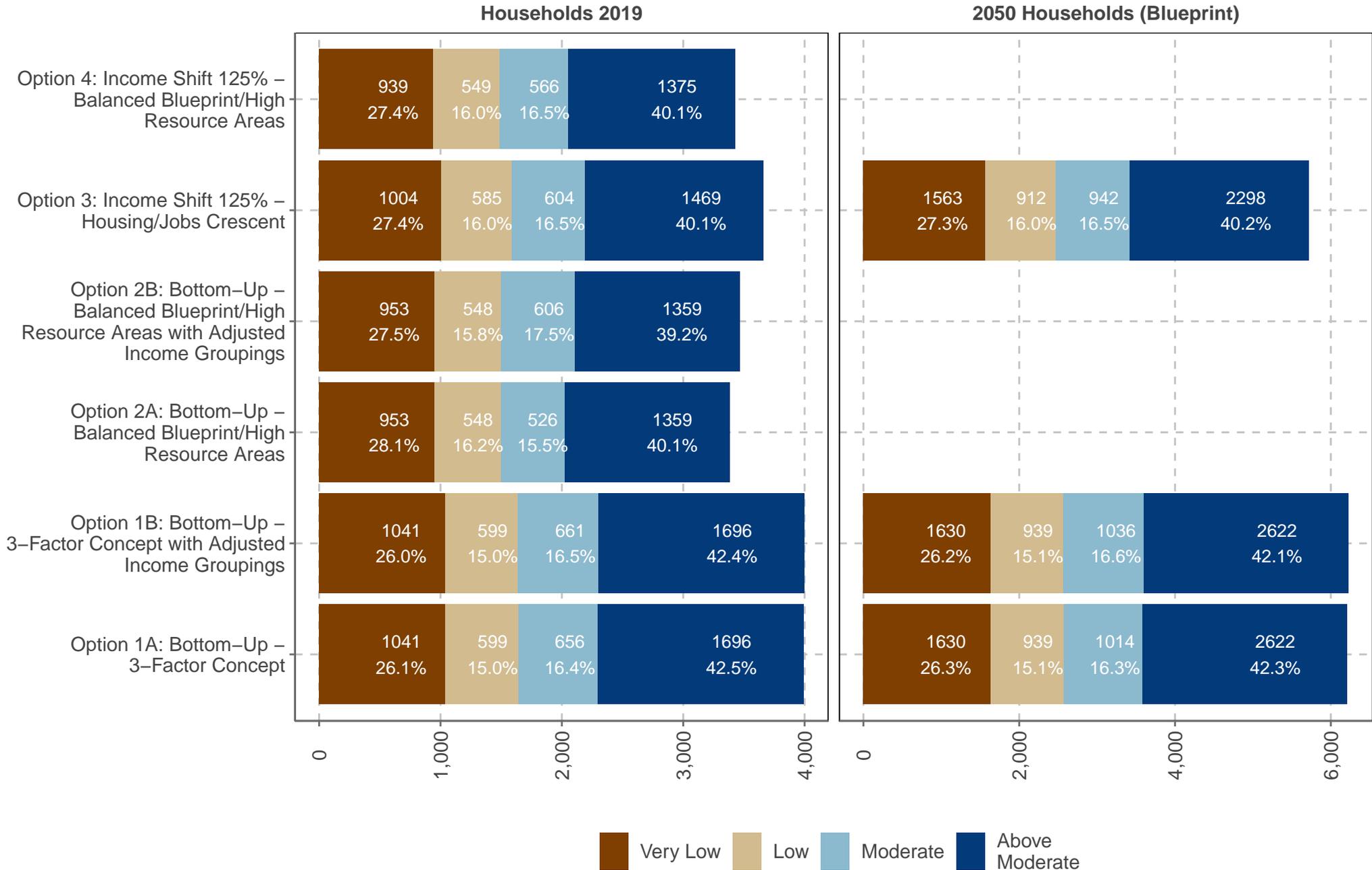
**Appendix 4: Potential RHNA Allocation, Income Distribution
Los Gatos
(2019 households: 12584)
(Santa Clara County)**

Map shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details.
Label shows allocation rounded to nearest 10.



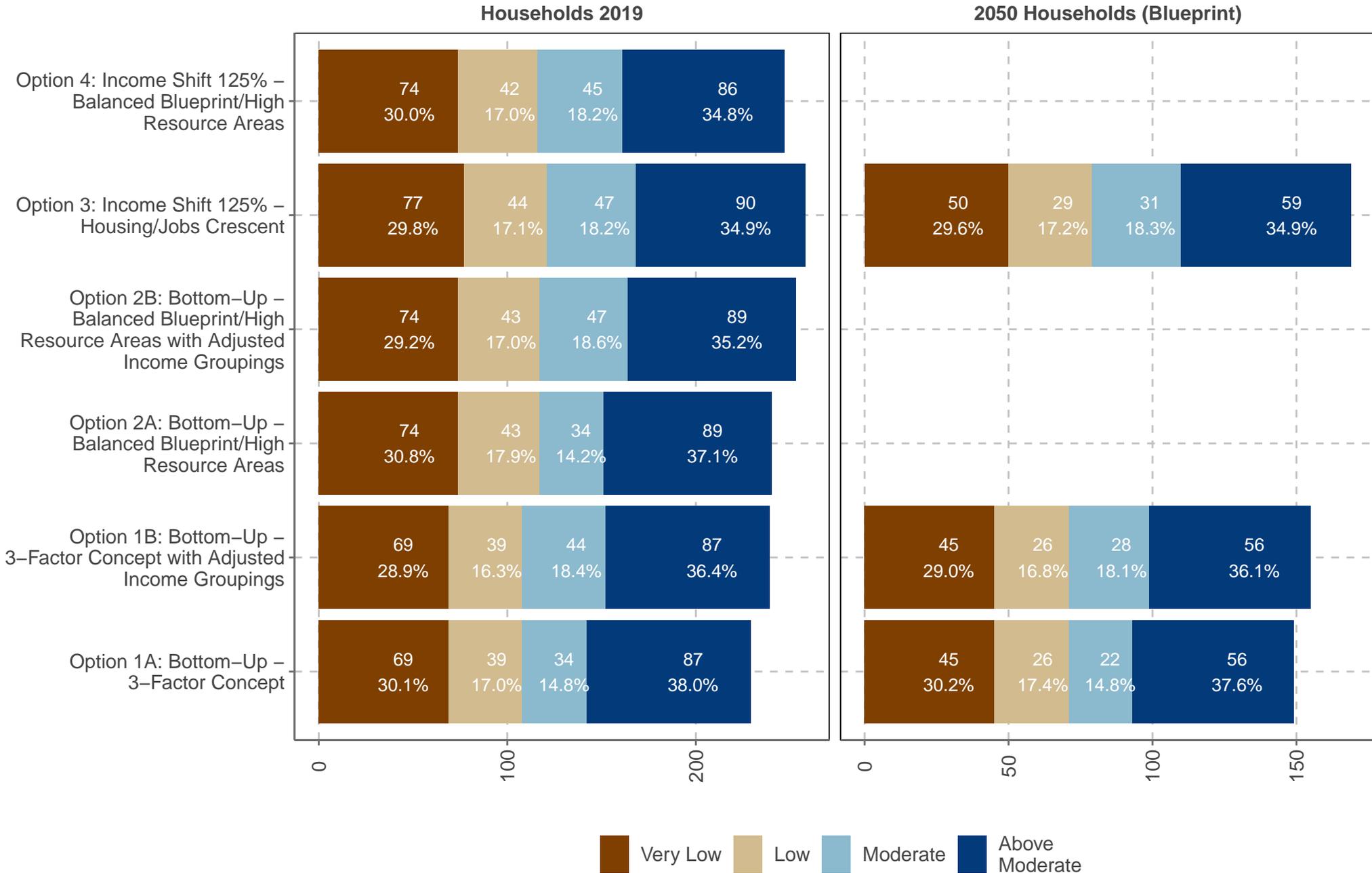
Appendix 4: Potential RHNA Allocation, Income Distribution Milpitas (2019 households: 21285) (Santa Clara County)

Map shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details. Label shows allocation rounded to nearest 10.



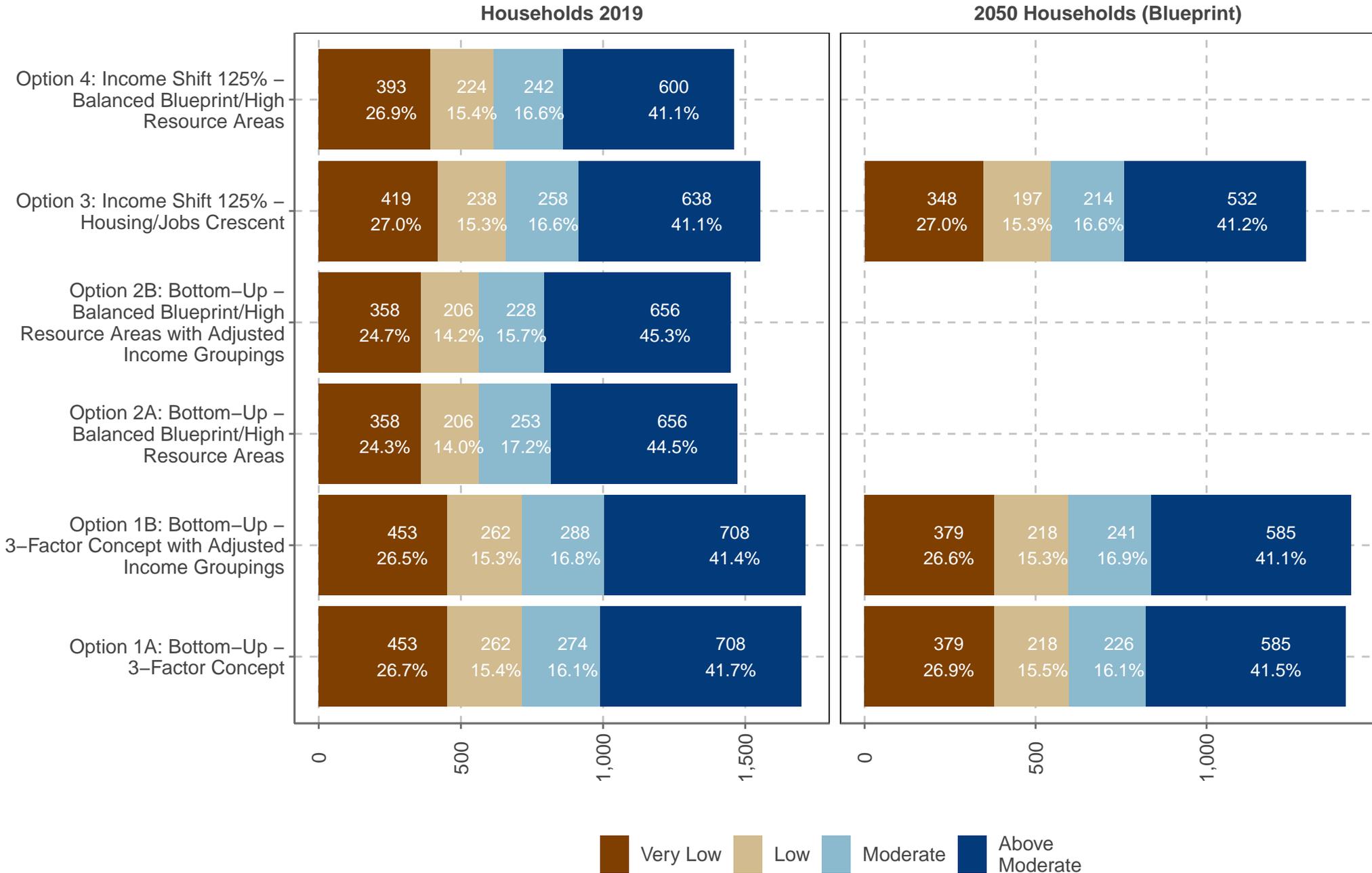
Appendix 4: Potential RHNA Allocation, Income Distribution Monte Sereno (2019 households: 1326) (Santa Clara County)

Map shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details. Label shows allocation rounded to nearest 10.



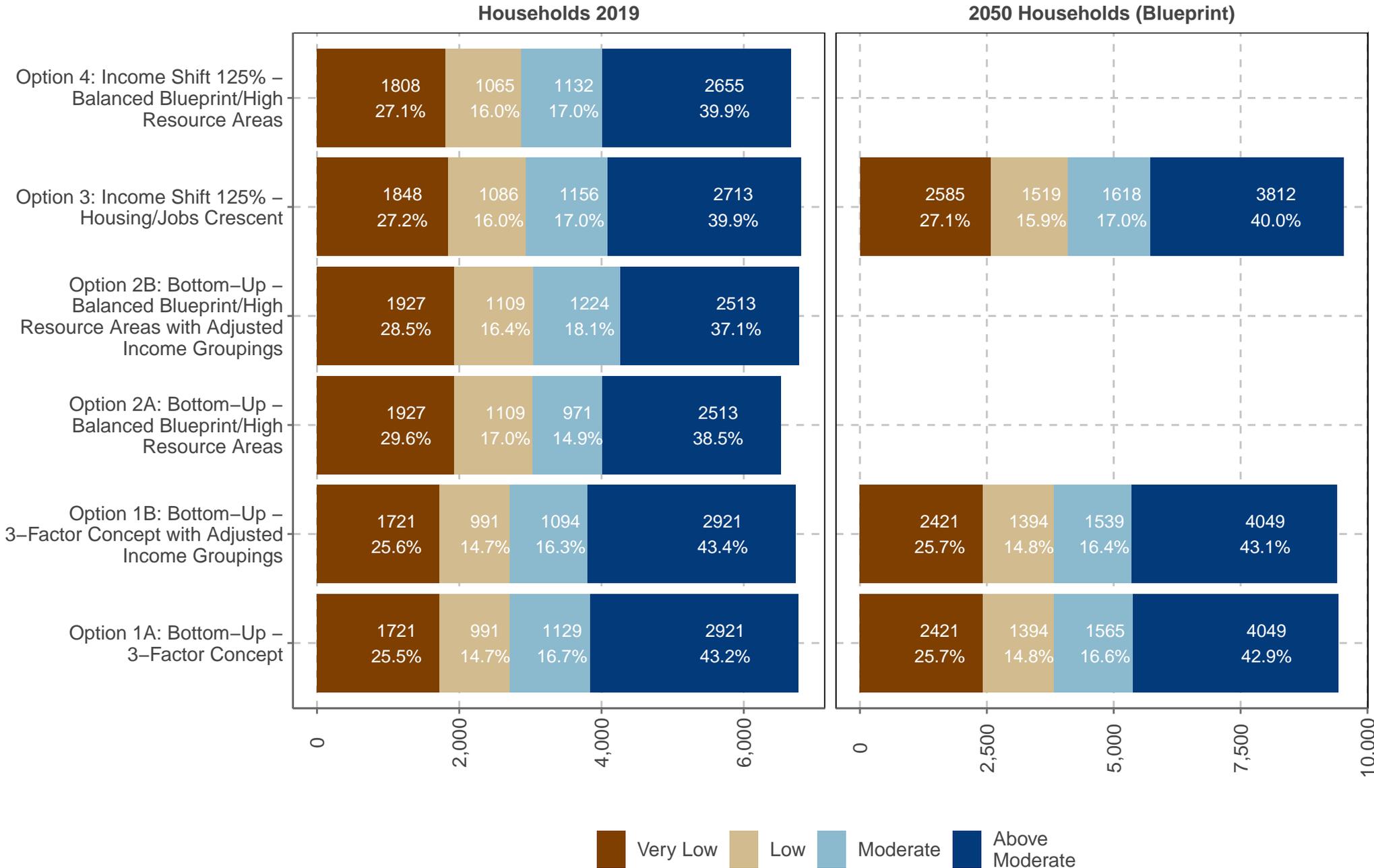
**Appendix 4: Potential RHNA Allocation, Income Distribution
Morgan Hill
(2019 households: 14409)
(Santa Clara County)**

Map shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details. Label shows allocation rounded to nearest 10.



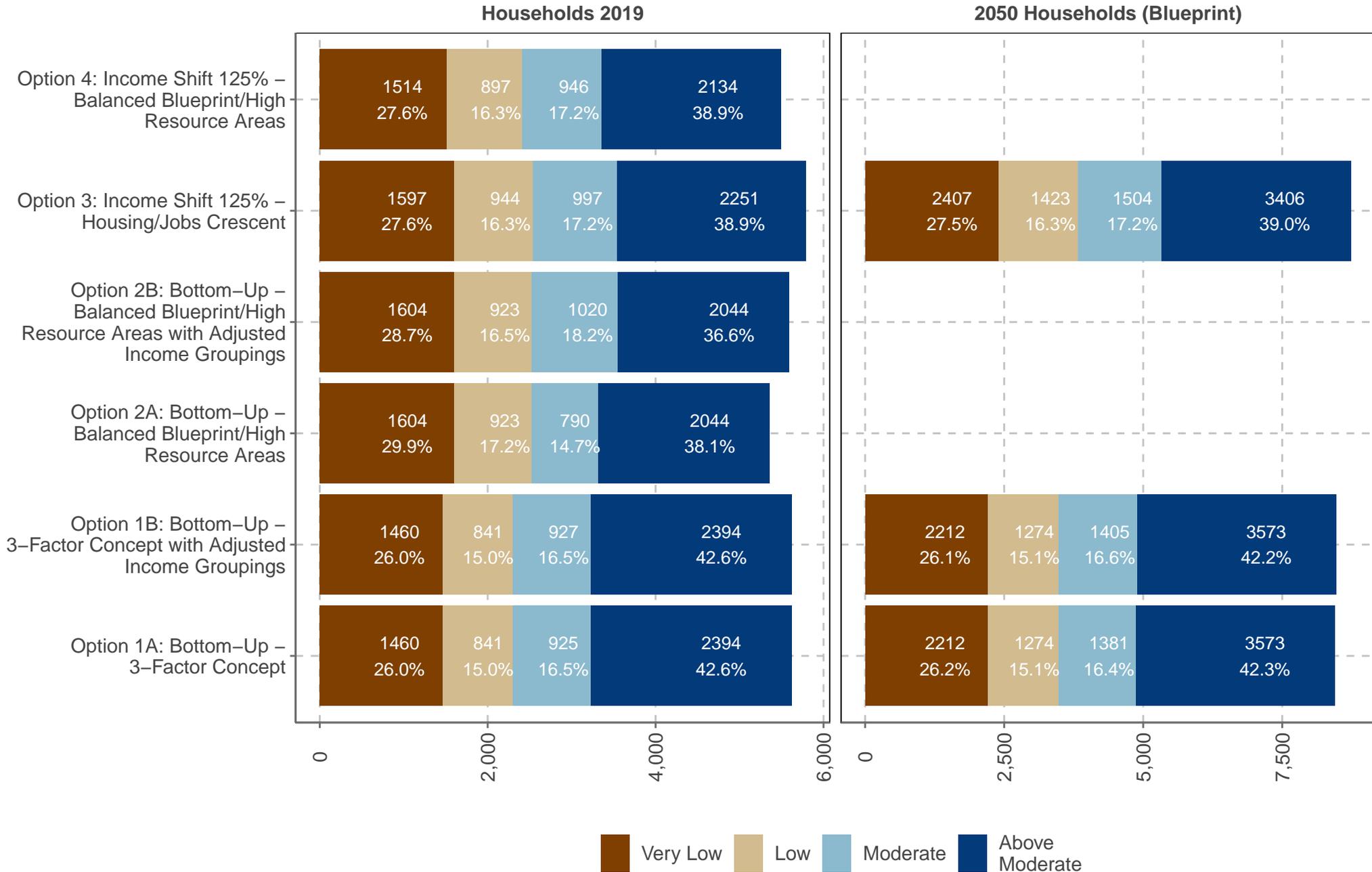
Appendix 4: Potential RHNA Allocation, Income Distribution Mountain View (2019 households: 34195) (Santa Clara County)

Map shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details. Label shows allocation rounded to nearest 10.



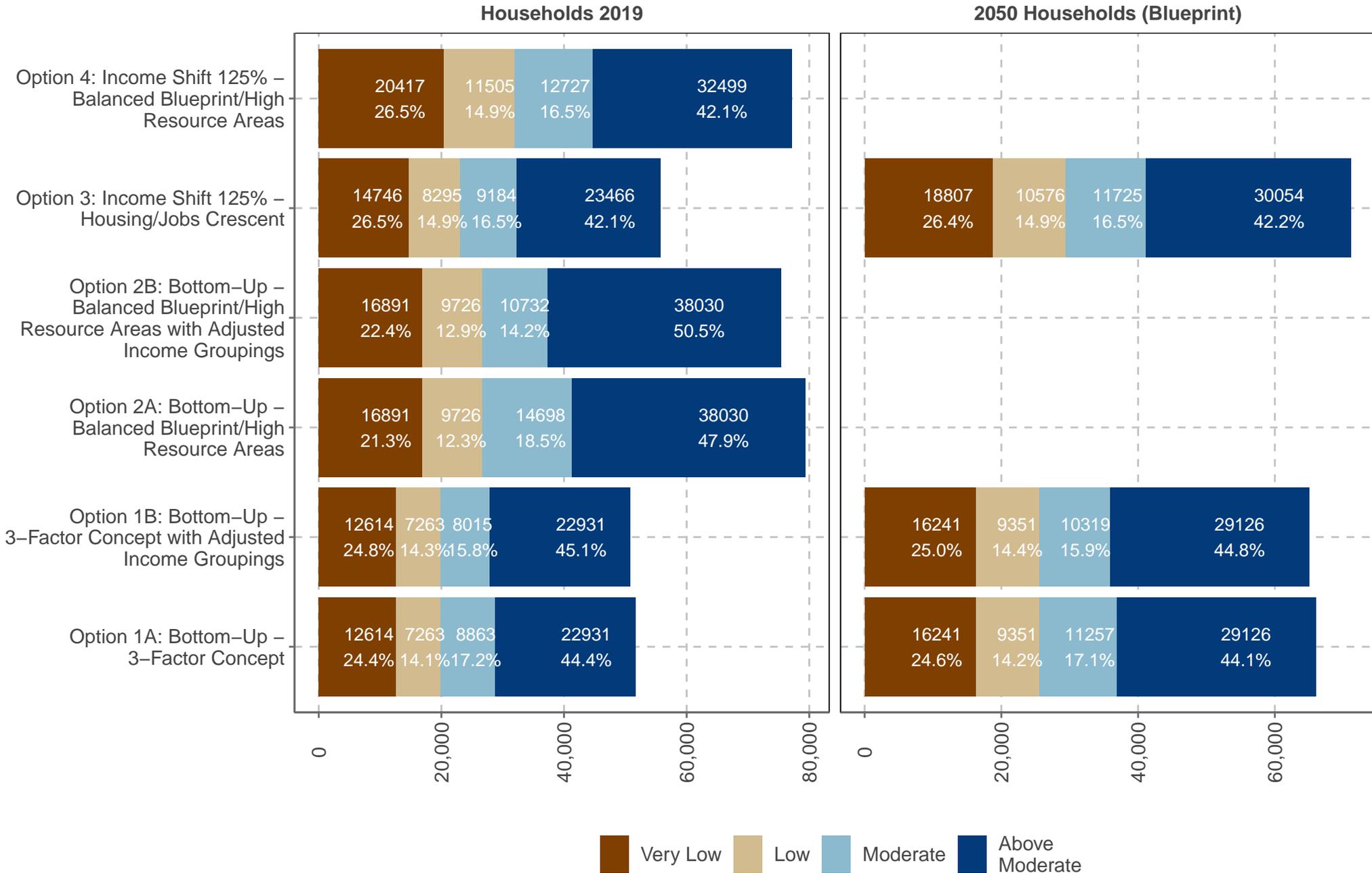
Appendix 4: Potential RHNA Allocation, Income Distribution Palo Alto (2019 households: 27629) (Santa Clara County)

Map shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details. Label shows allocation rounded to nearest 10.



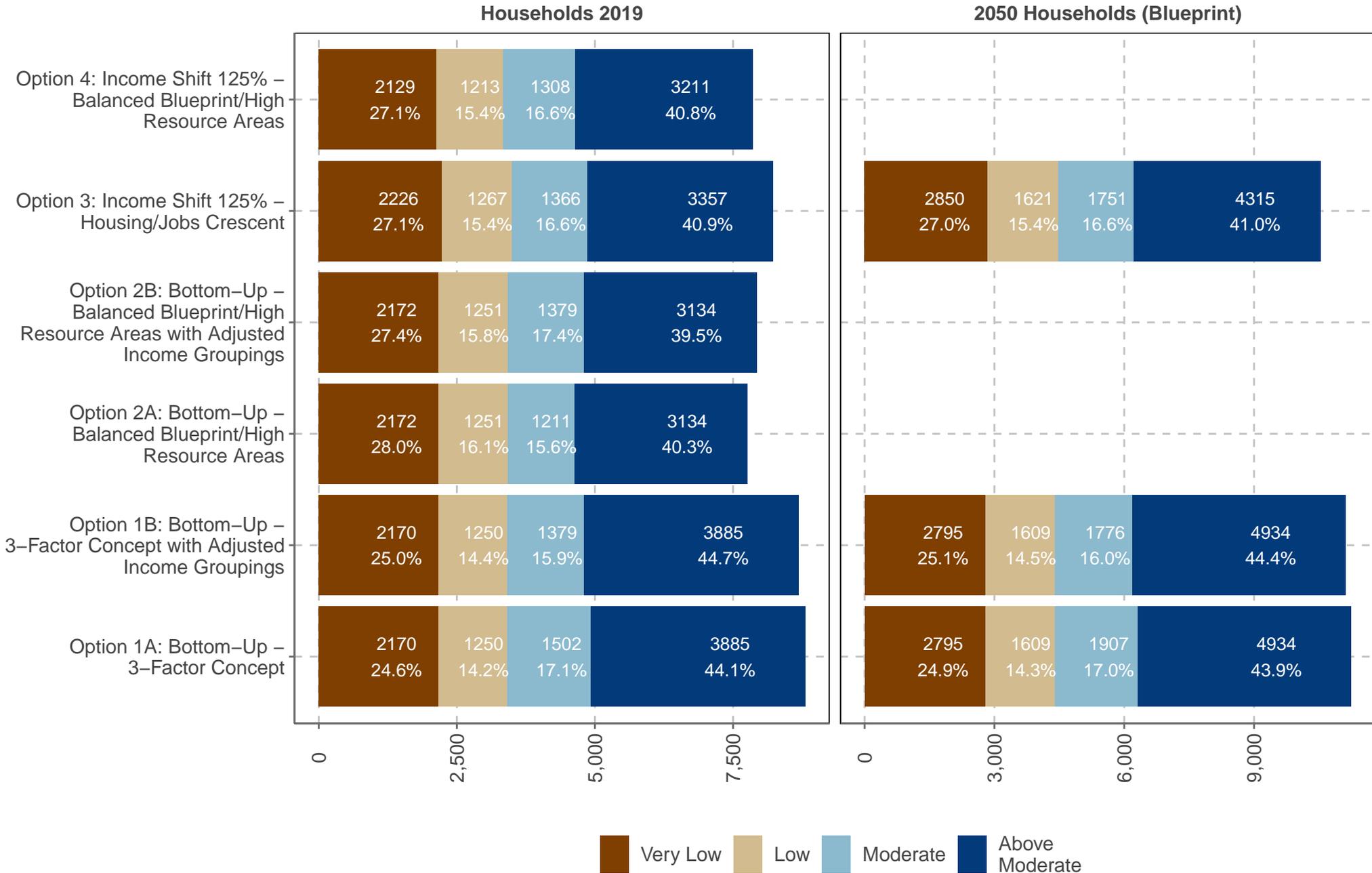
Appendix 4: Potential RHNA Allocation, Income Distribution San Jose (2019 households: 321556) (Santa Clara County)

Map shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details. Label shows allocation rounded to nearest 10.



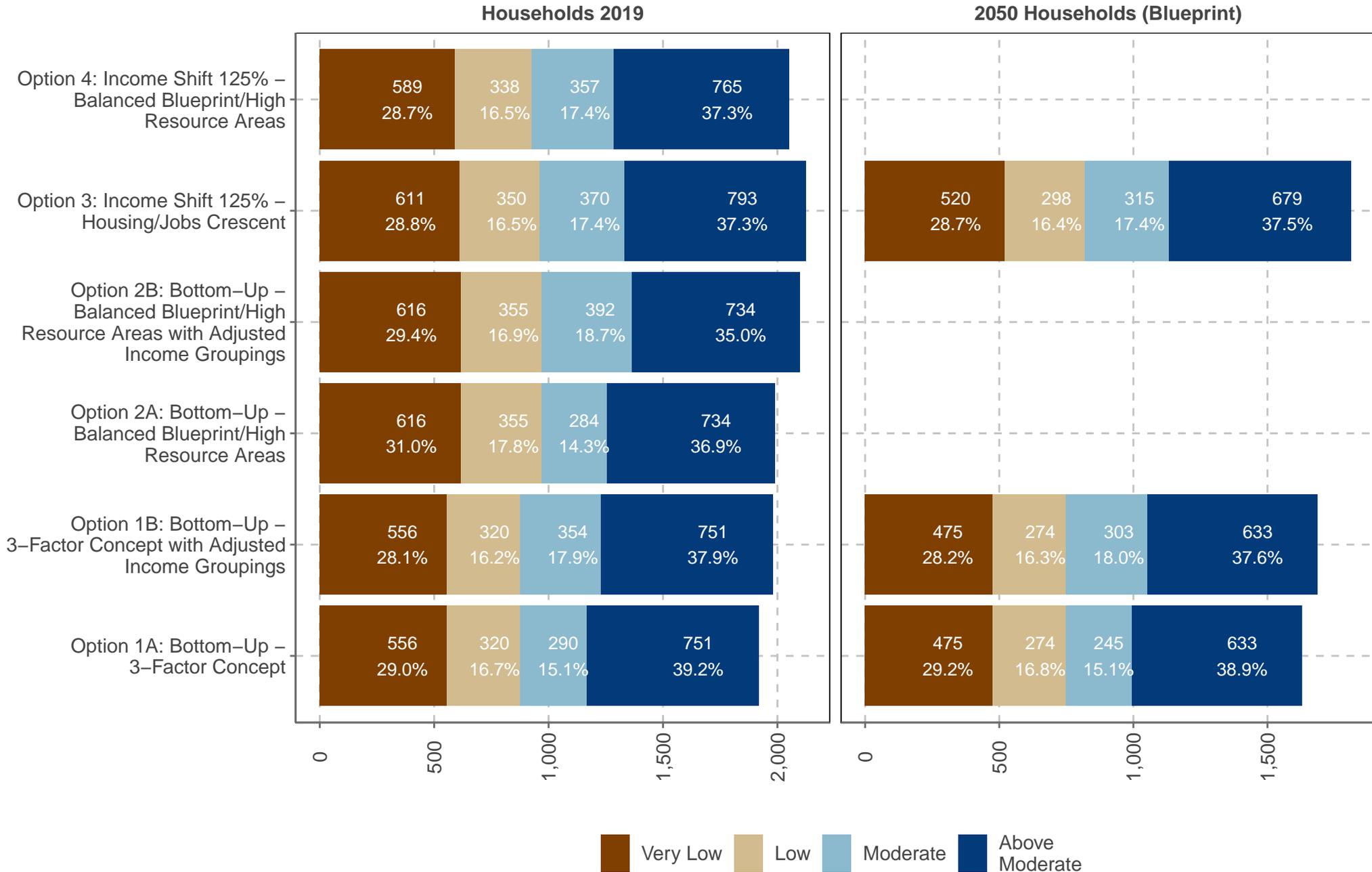
**Appendix 4: Potential RHNA Allocation, Income Distribution
 Santa Clara
 (2019 households: 46070)
 (Santa Clara County)**

Map shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details. Label shows allocation rounded to nearest 10.



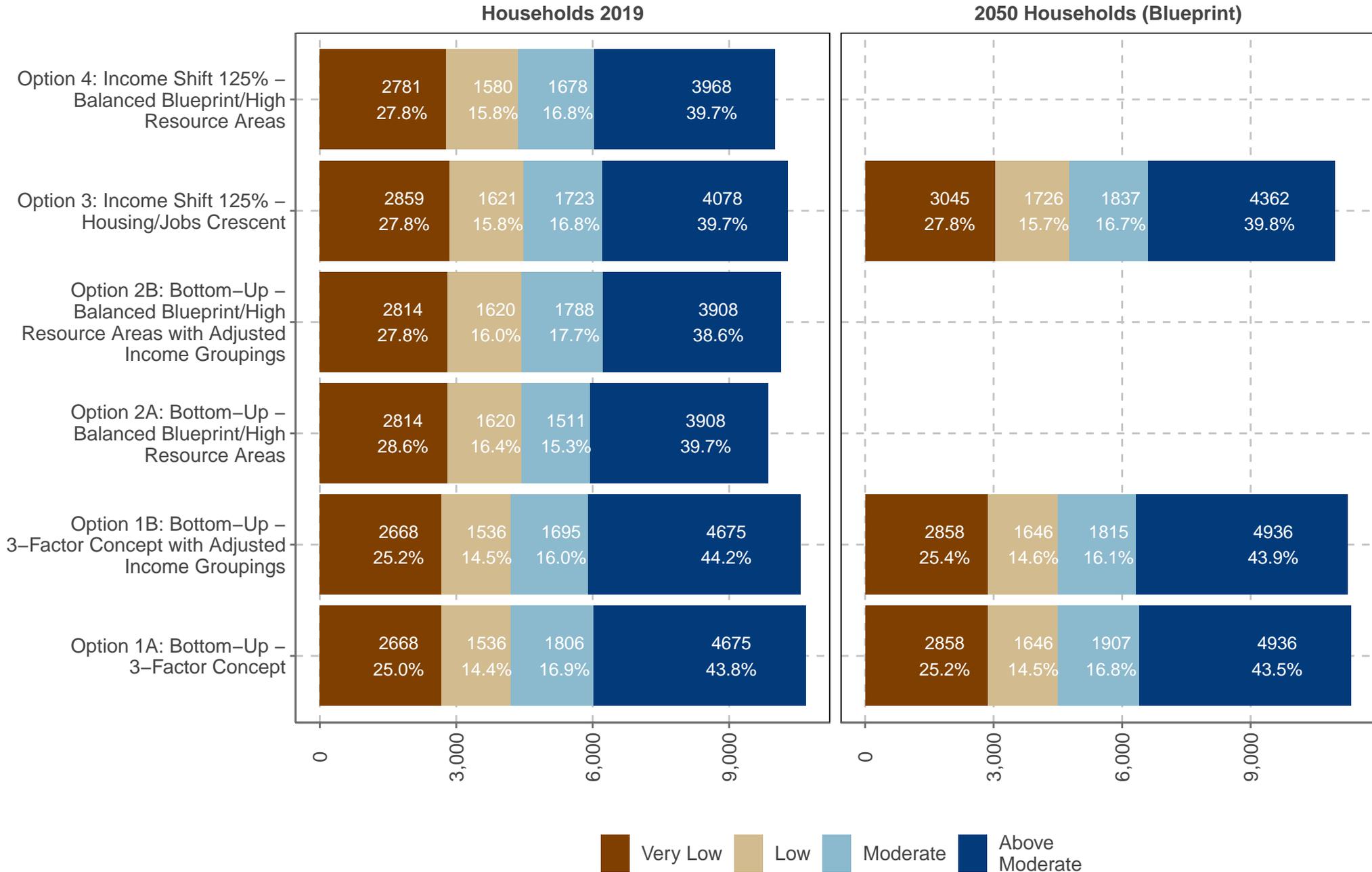
Appendix 4: Potential RHNA Allocation, Income Distribution Saratoga (2019 households: 10887) (Santa Clara County)

Map shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details. Label shows allocation rounded to nearest 10.



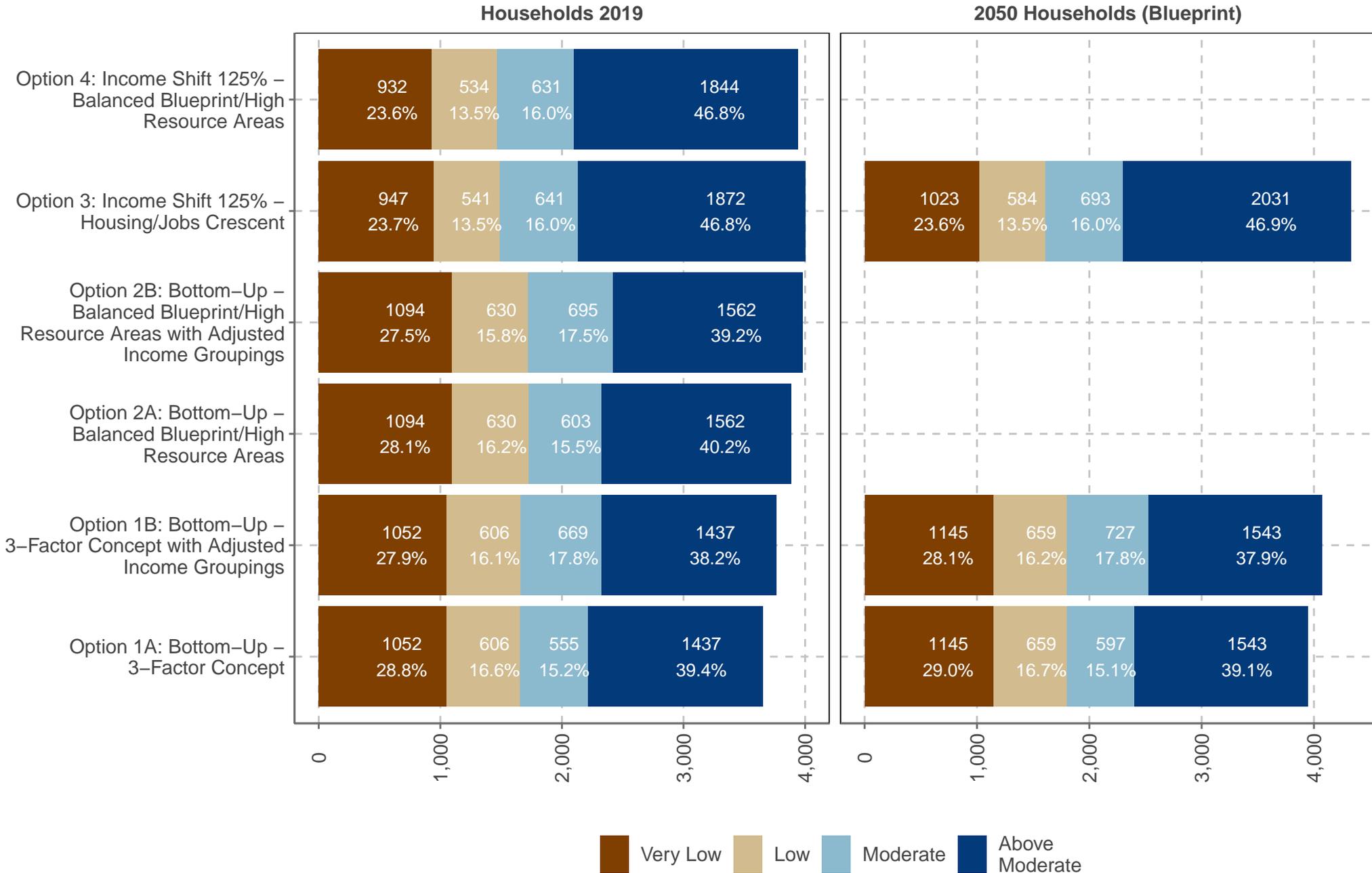
Appendix 4: Potential RHNA Allocation, Income Distribution Sunnyvale (2019 households: 57327) (Santa Clara County)

Map shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details.
Label shows allocation rounded to nearest 10.



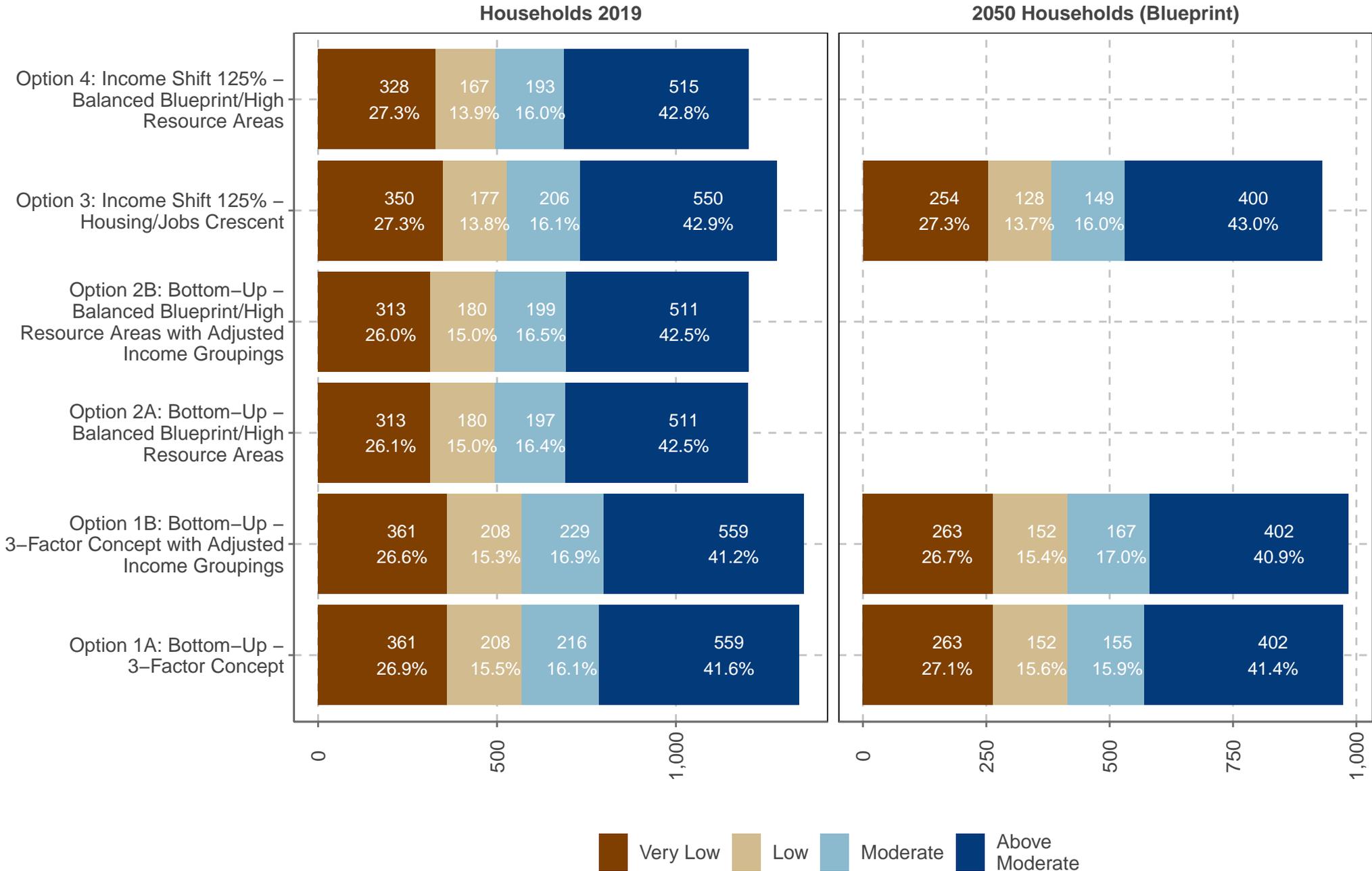
Appendix 4: Potential RHNA Allocation, Income Distribution
Uninc. Santa Clara
(2019 households: 26599)
(Santa Clara County)

Map shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details.
 Label shows allocation rounded to nearest 10.



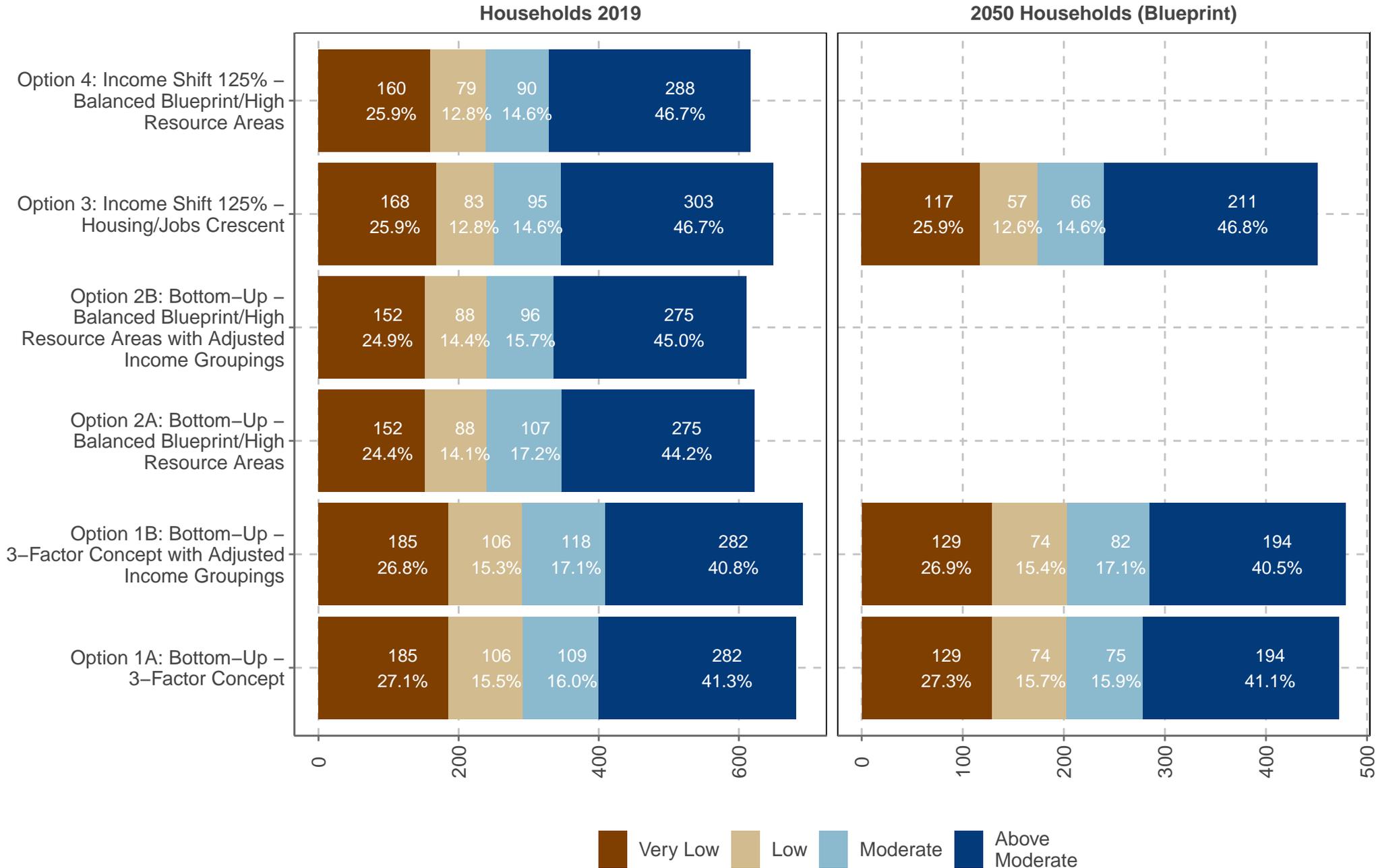
Appendix 4: Potential RHNA Allocation, Income Distribution Benicia (2019 households: 10666) (Solano County)

Map shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details. Label shows allocation rounded to nearest 10.



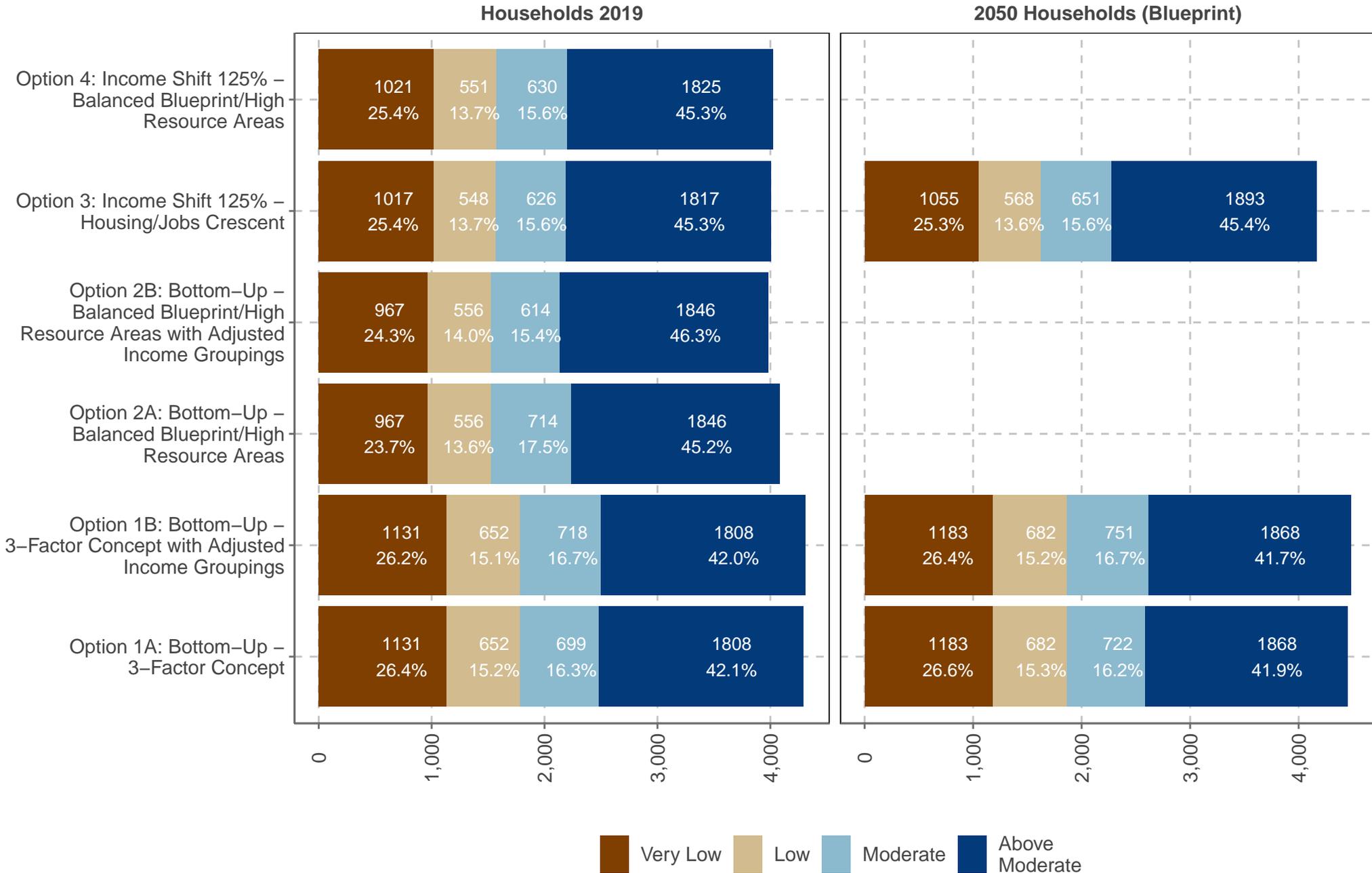
Appendix 4: Potential RHNA Allocation, Income Distribution Dixon (2019 households: 6174) (Solano County)

Map shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details. Label shows allocation rounded to nearest 10.



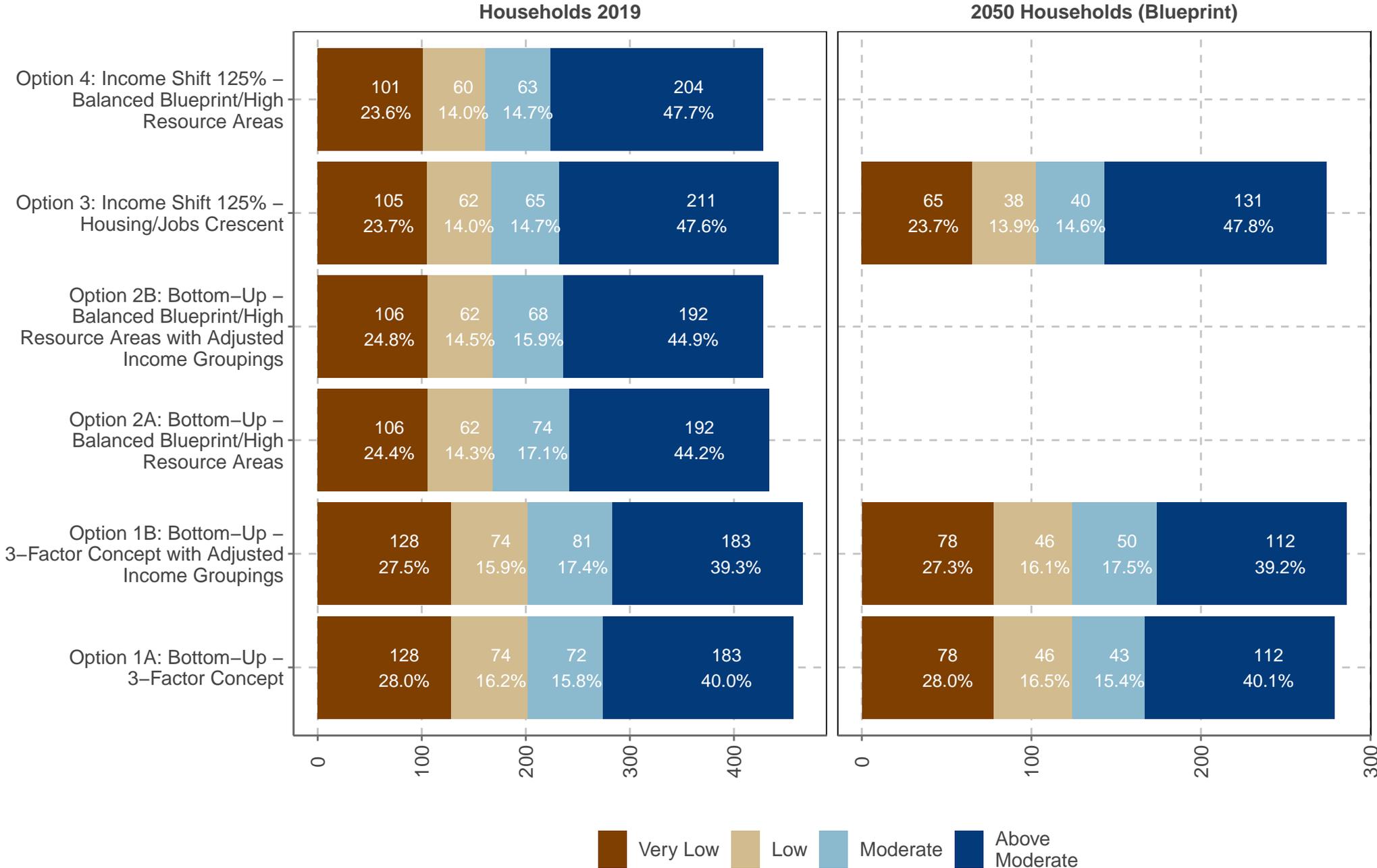
Appendix 4: Potential RHNA Allocation, Income Distribution Fairfield (2019 households: 37344) (Solano County)

Map shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details. Label shows allocation rounded to nearest 10.



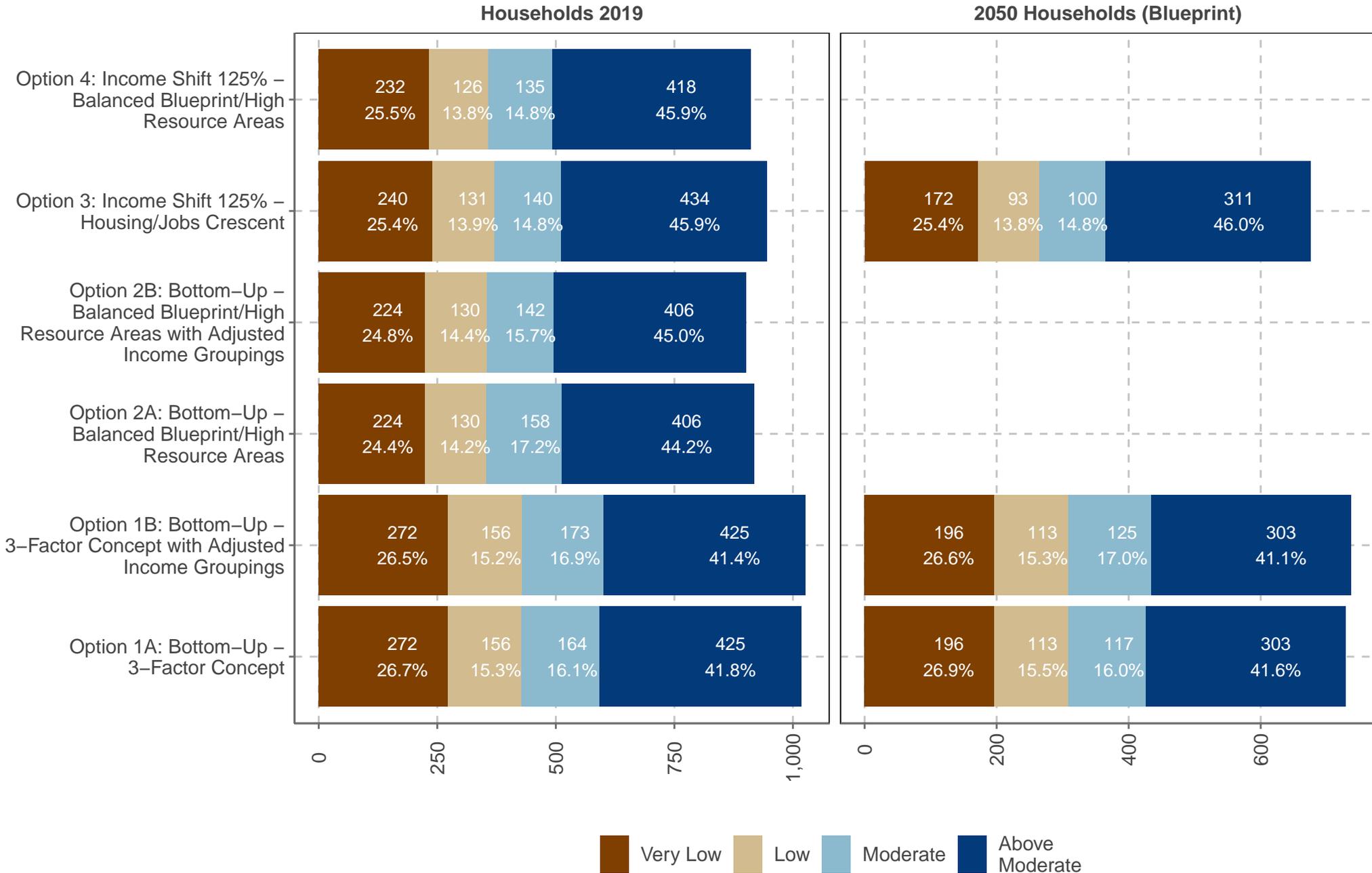
Appendix 4: Potential RHNA Allocation, Income Distribution Rio Vista (2019 households: 4319) (Solano County)

Map shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details.
Label shows allocation rounded to nearest 10.



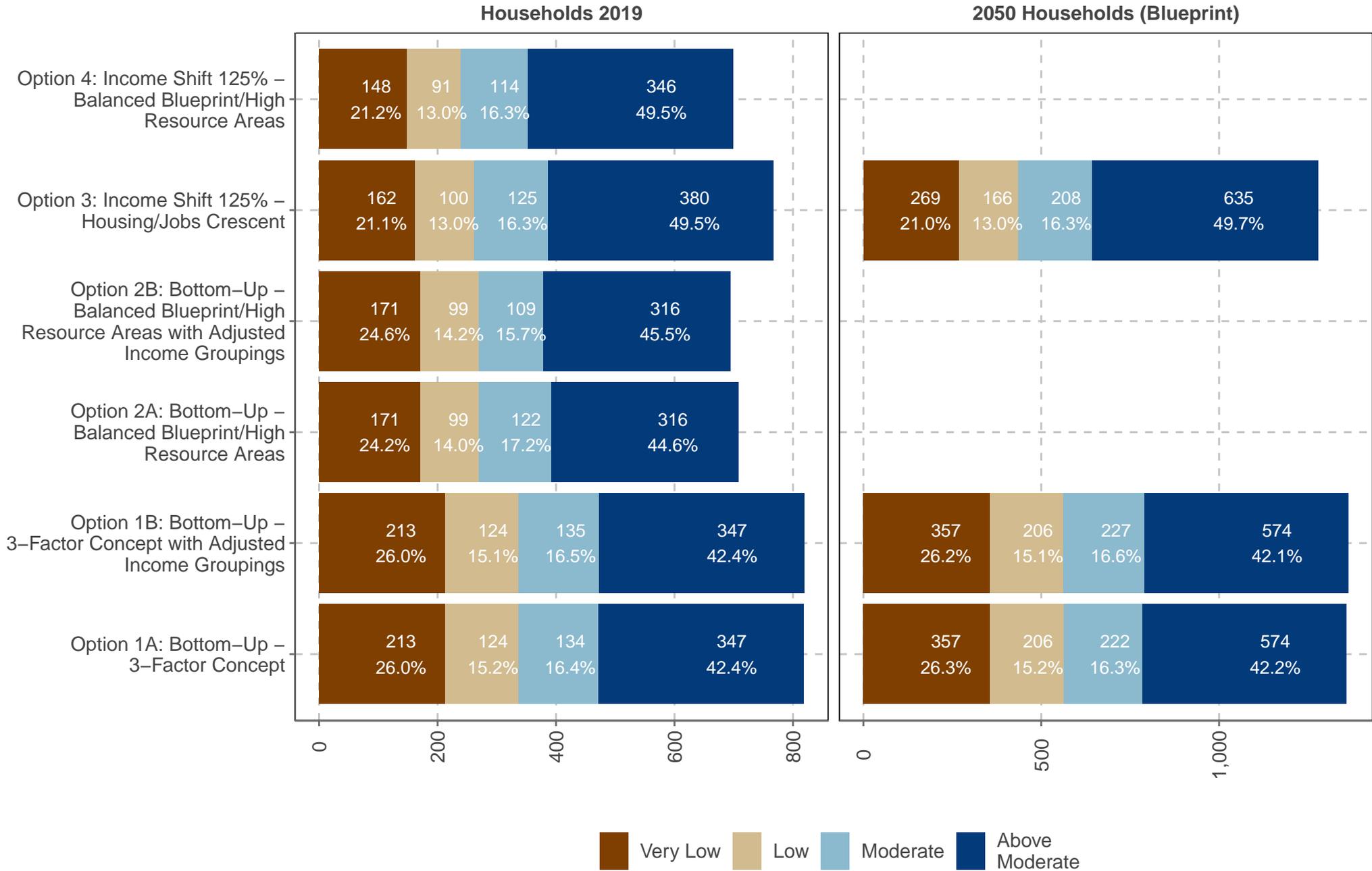
Appendix 4: Potential RHNA Allocation, Income Distribution Suisun City (2019 households: 9114) (Solano County)

Map shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details. Label shows allocation rounded to nearest 10.



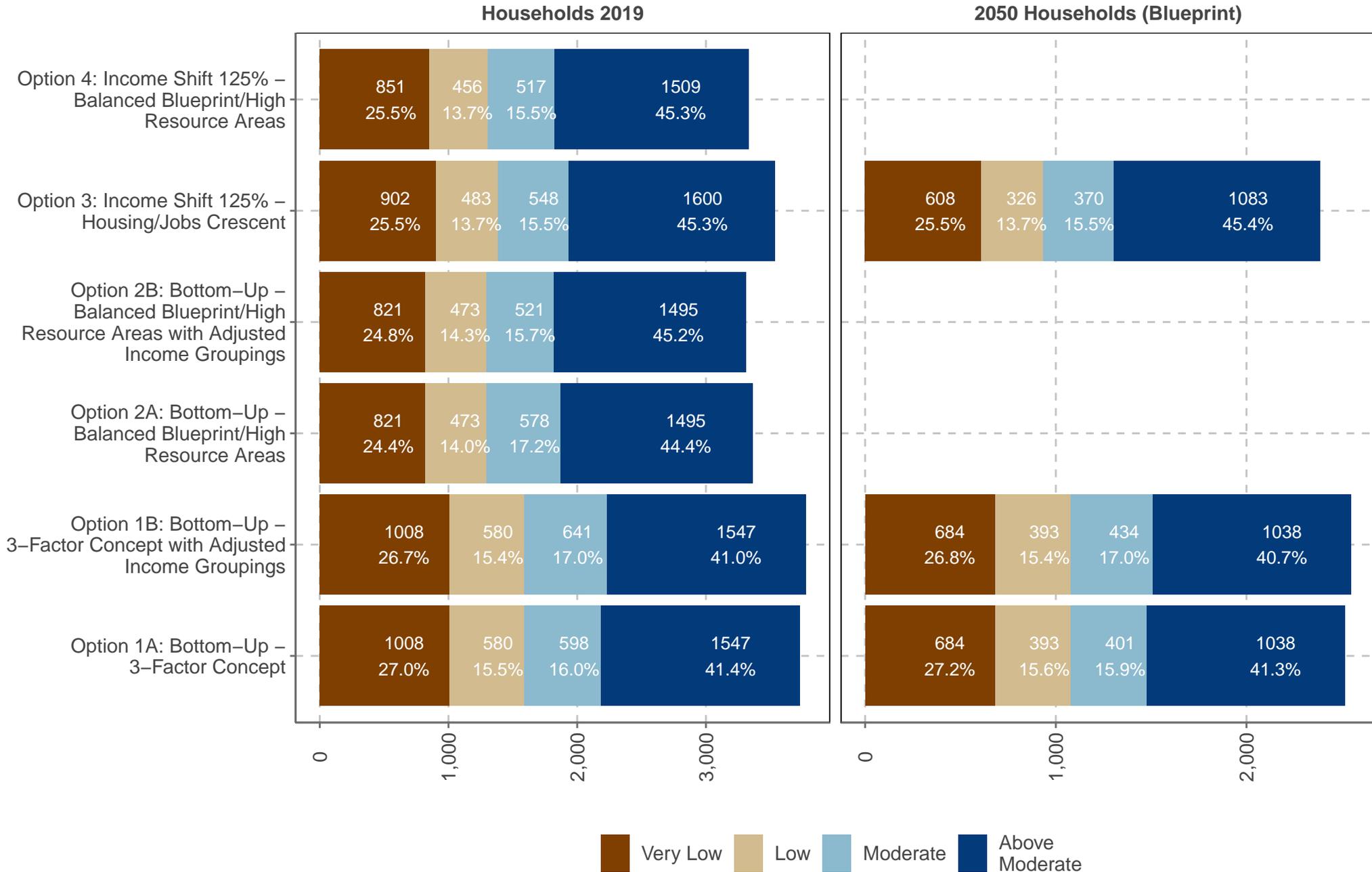
Appendix 4: Potential RHNA Allocation, Income Distribution Uninc. Solano (2019 households: 6820) (Solano County)

Map shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details. Label shows allocation rounded to nearest 10.



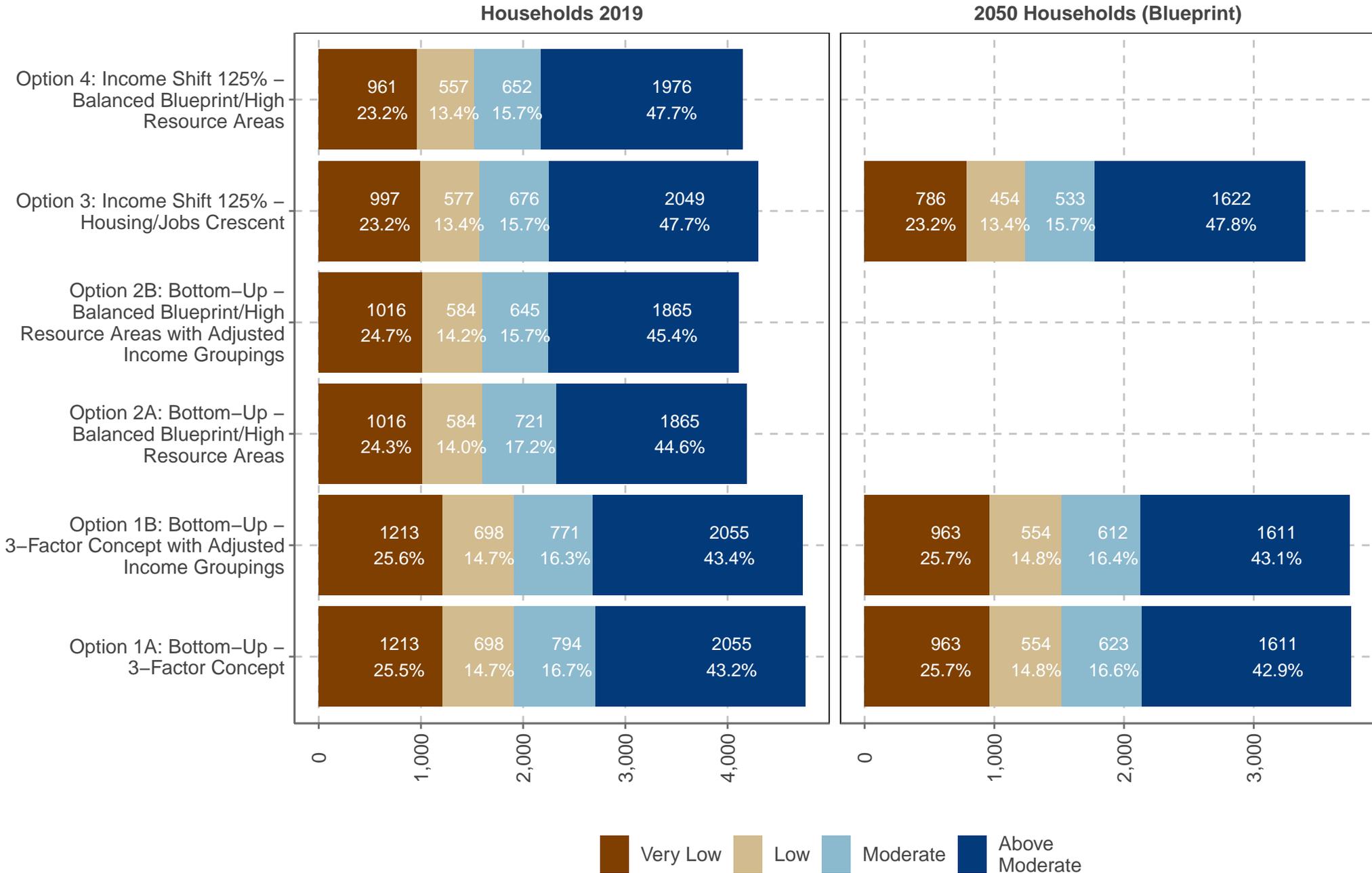
Appendix 4: Potential RHNA Allocation, Income Distribution Vacaville (2019 households: 33136) (Solano County)

Map shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details.
Label shows allocation rounded to nearest 10.



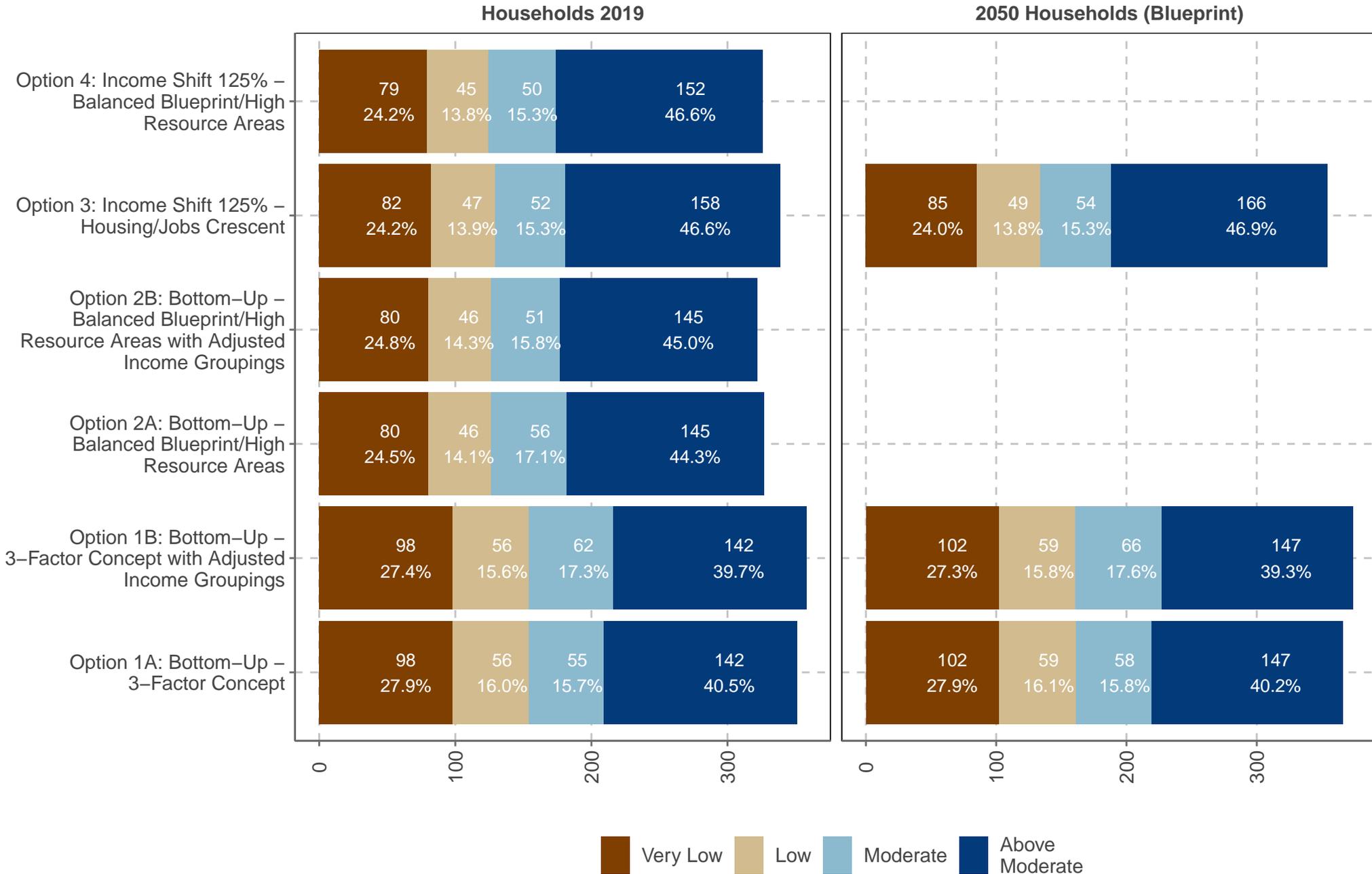
Appendix 4: Potential RHNA Allocation, Income Distribution Vallejo (2019 households: 40728) (Solano County)

Map shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details. Label shows allocation rounded to nearest 10.



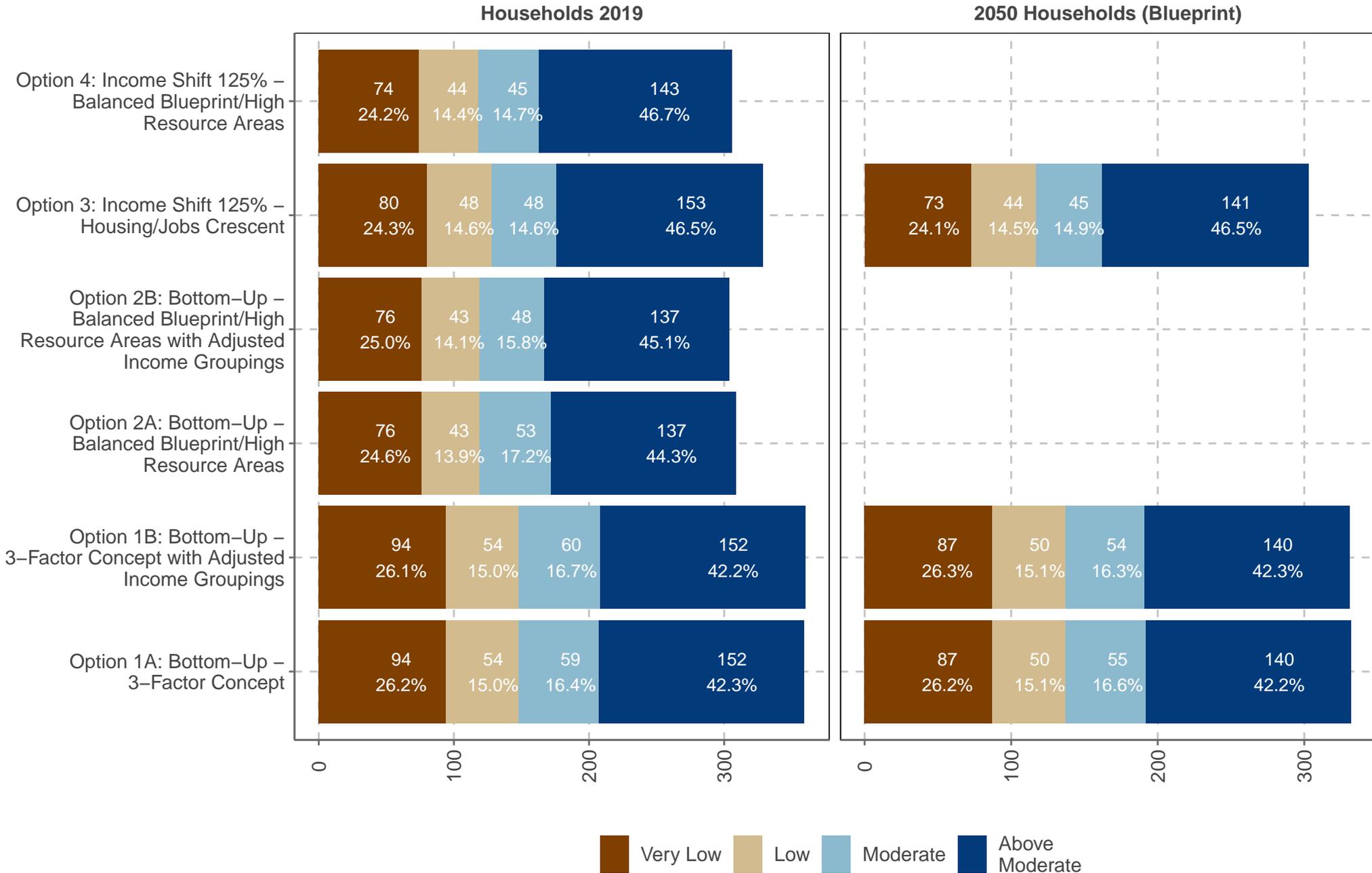
Appendix 4: Potential RHNA Allocation, Income Distribution Cloverdale (2019 households: 3252) (Sonoma County)

Map shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details. Label shows allocation rounded to nearest 10.



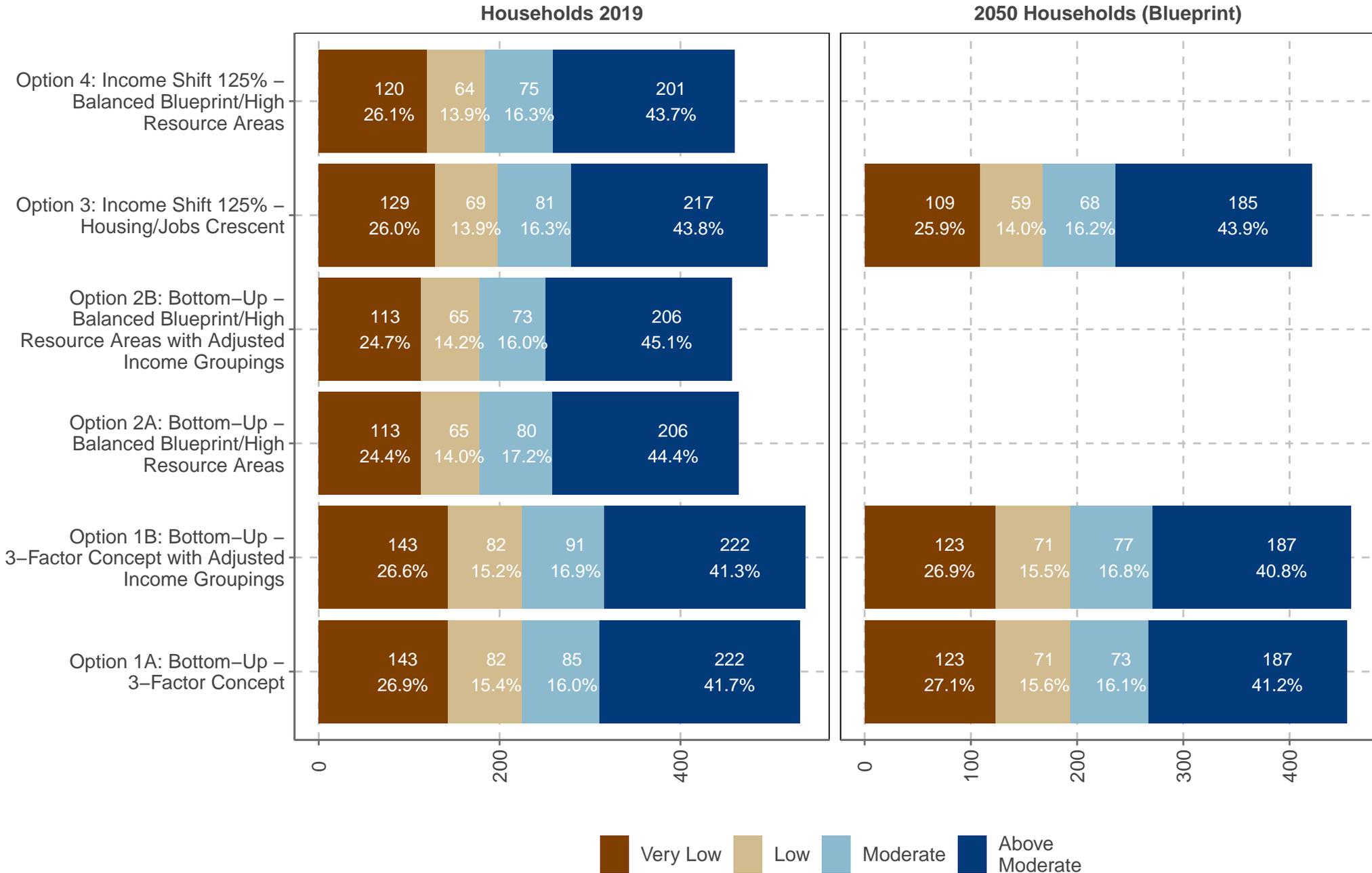
Appendix 4: Potential RHNA Allocation, Income Distribution Cotati (2019 households: 3071) (Sonoma County)

Map shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details. Label shows allocation rounded to nearest 10.



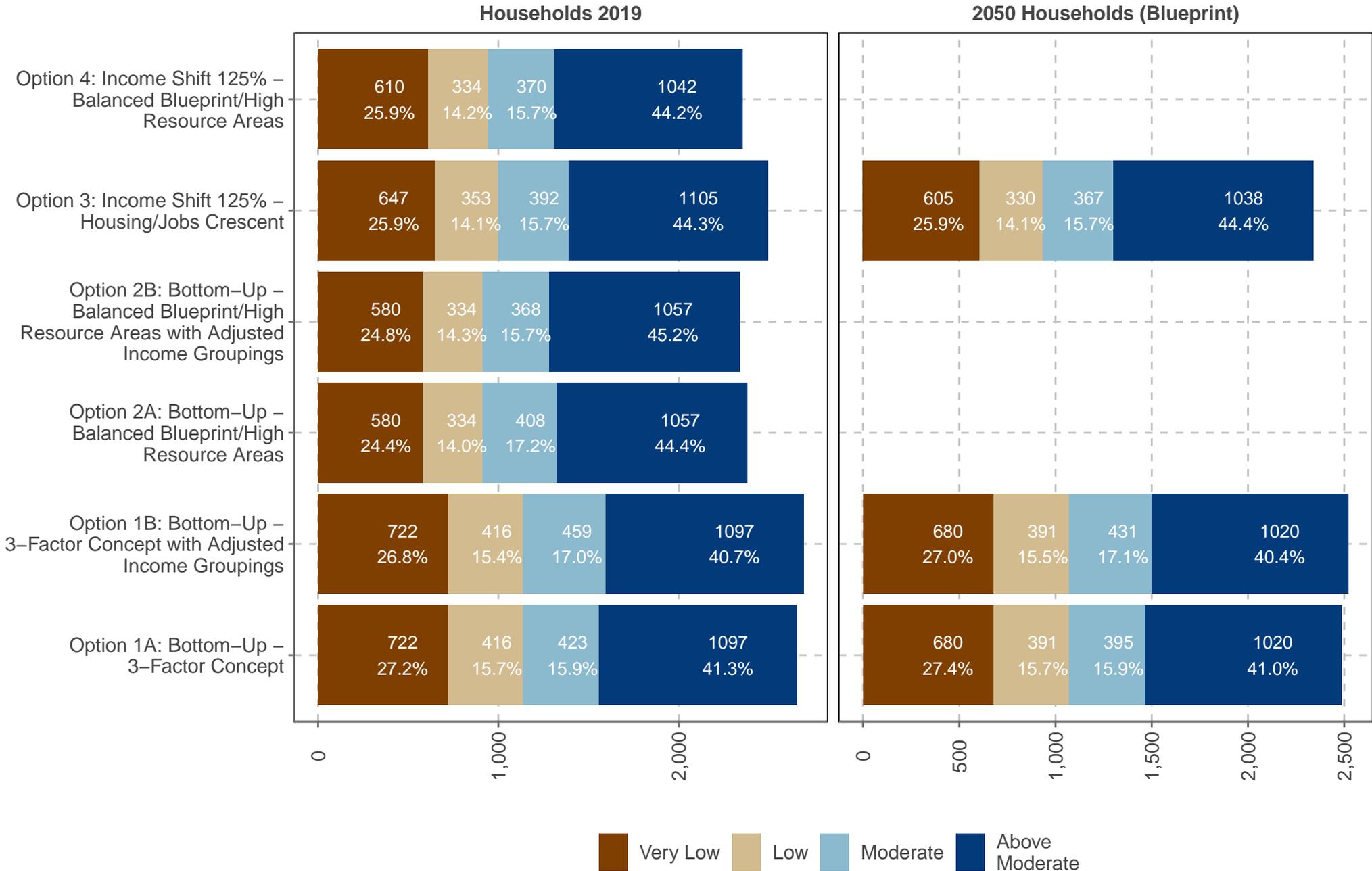
Appendix 4: Potential RHNA Allocation, Income Distribution Healdsburg (2019 households: 4603) (Sonoma County)

Map shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details. Label shows allocation rounded to nearest 10.



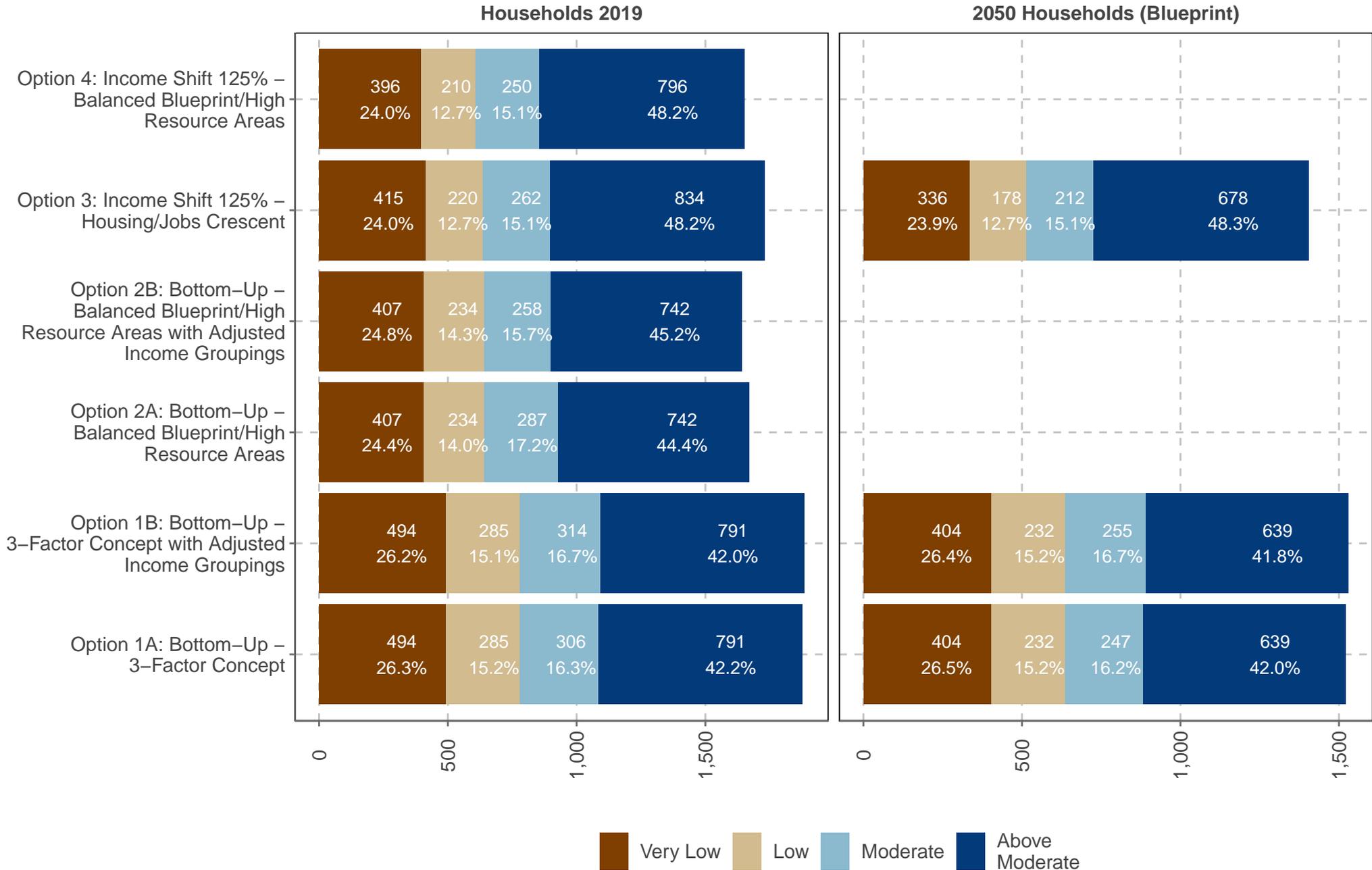
Appendix 4: Potential RHNA Allocation, Income Distribution Petaluma (2019 households: 22519) (Sonoma County)

Map shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details.
Label shows allocation rounded to nearest 10.



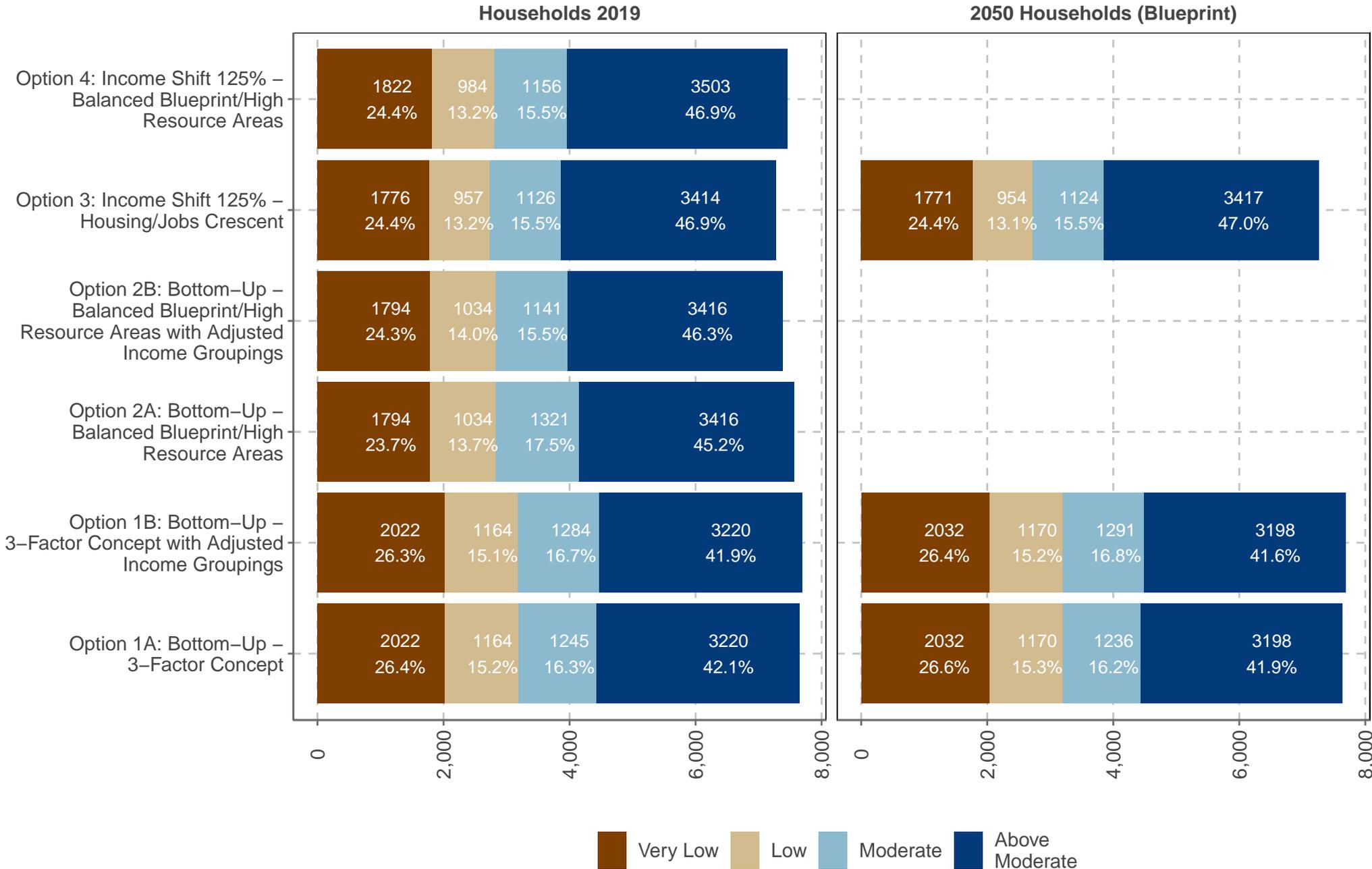
**Appendix 4: Potential RHNA Allocation, Income Distribution
Rohnert Park
(2019 households: 16356)
(Sonoma County)**

Map shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details. Label shows allocation rounded to nearest 10.



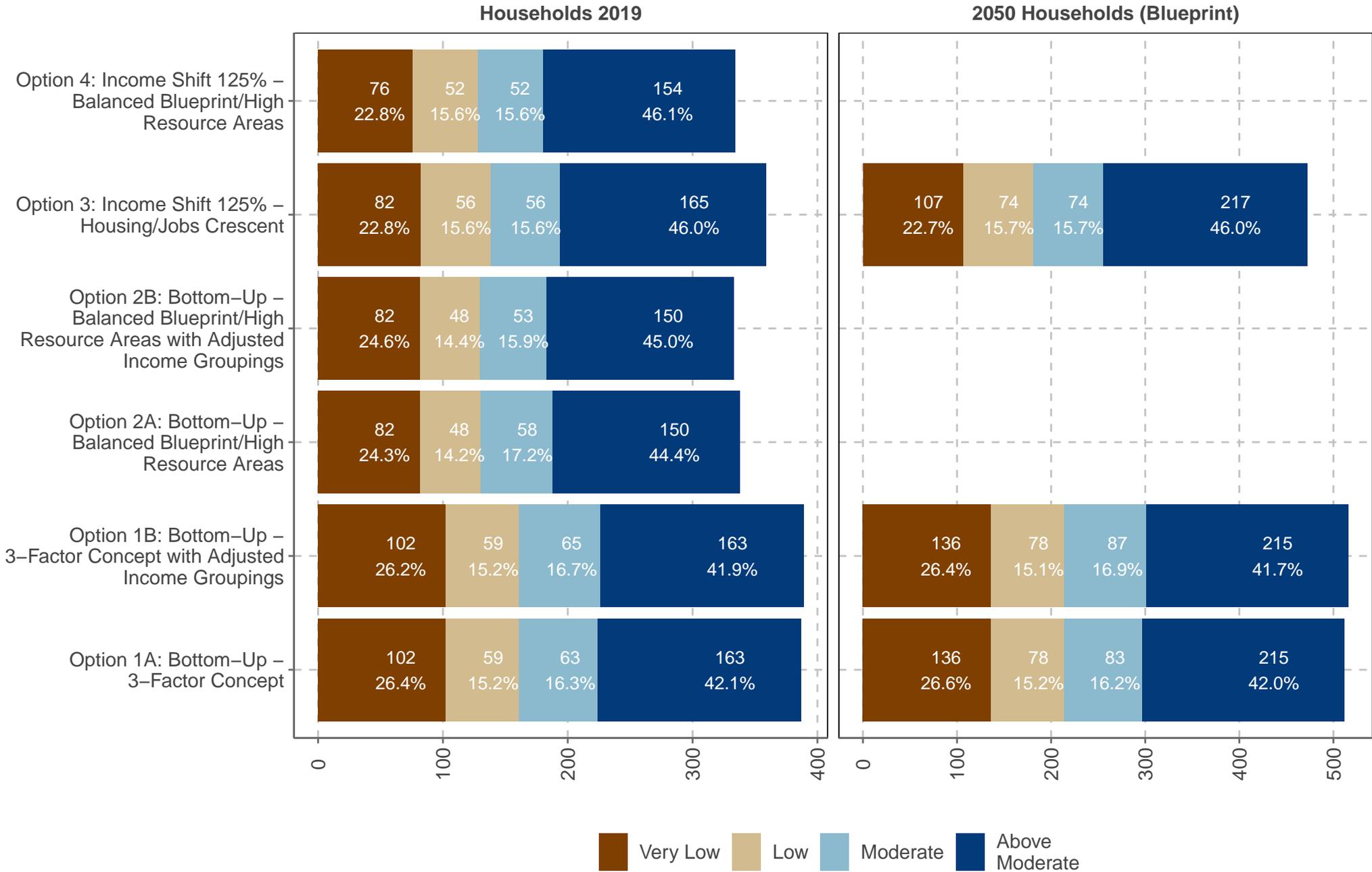
Appendix 4: Potential RHNA Allocation, Income Distribution Santa Rosa (2019 households: 64977) (Sonoma County)

Map shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details.
Label shows allocation rounded to nearest 10.



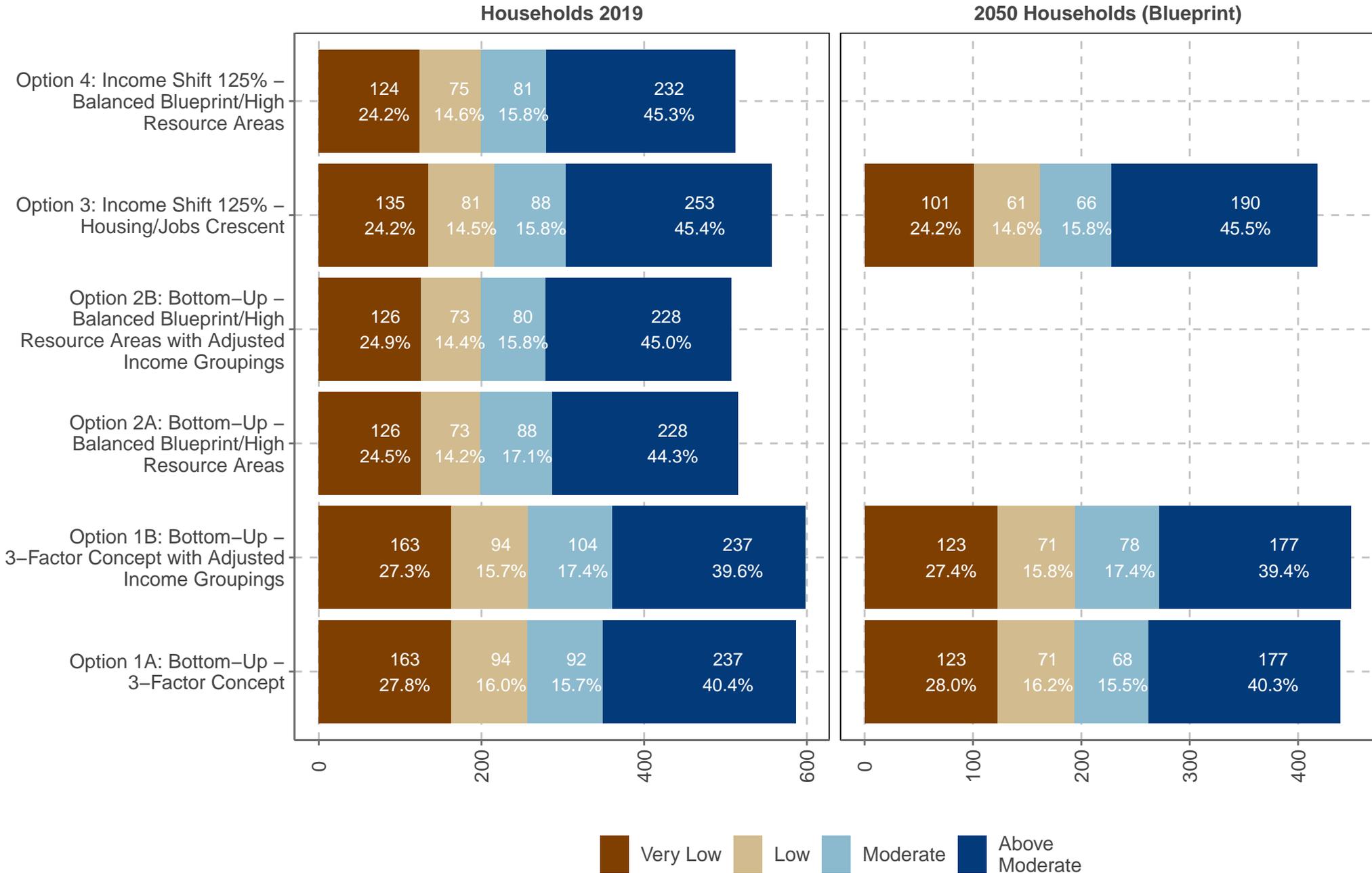
Appendix 4: Potential RHNA Allocation, Income Distribution Sebastopol (2019 households: 3334) (Sonoma County)

Map shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details. Label shows allocation rounded to nearest 10.



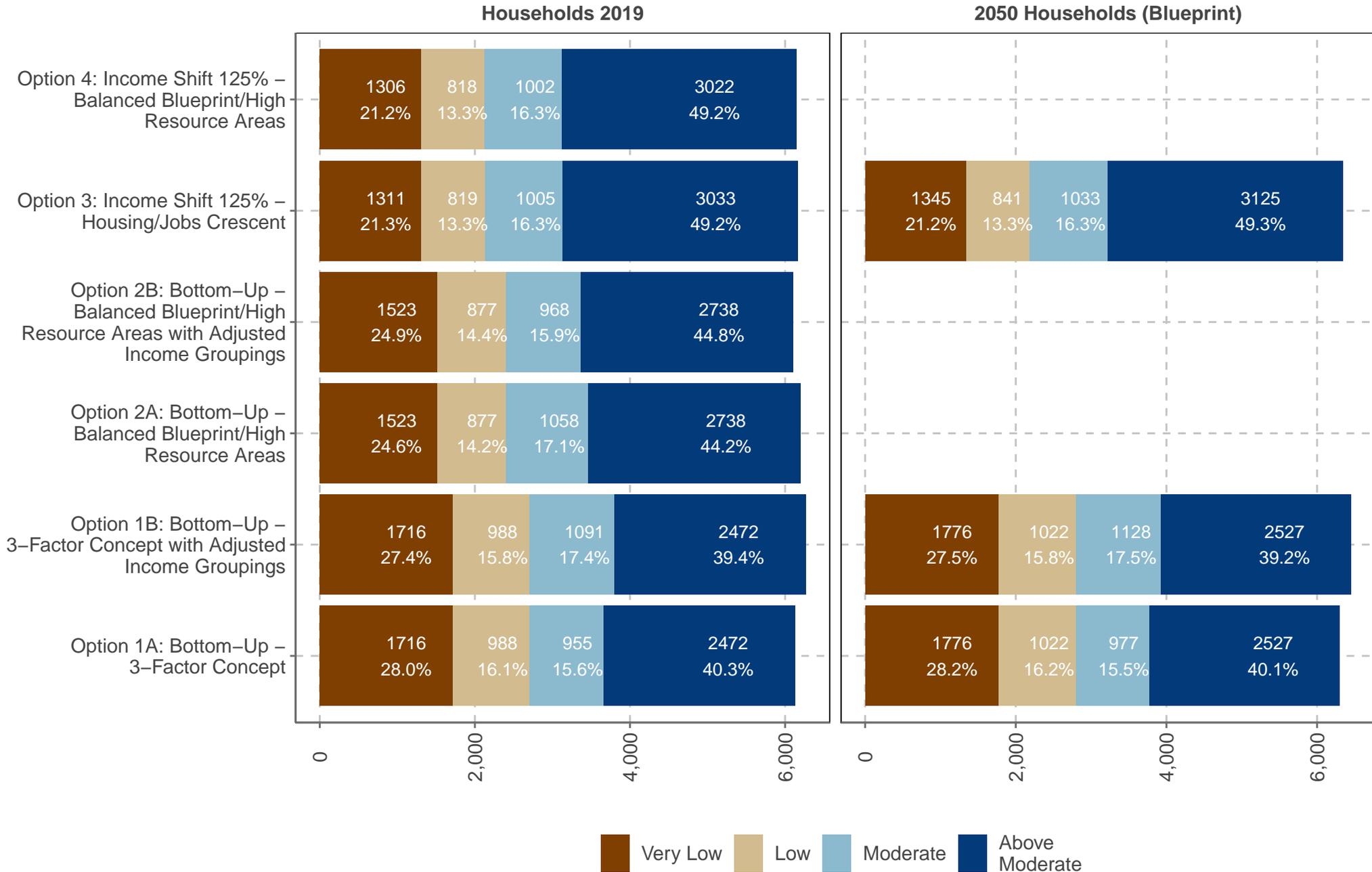
Appendix 4: Potential RHNA Allocation, Income Distribution Sonoma (2019 households: 5122) (Sonoma County)

Map shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details. Label shows allocation rounded to nearest 10.



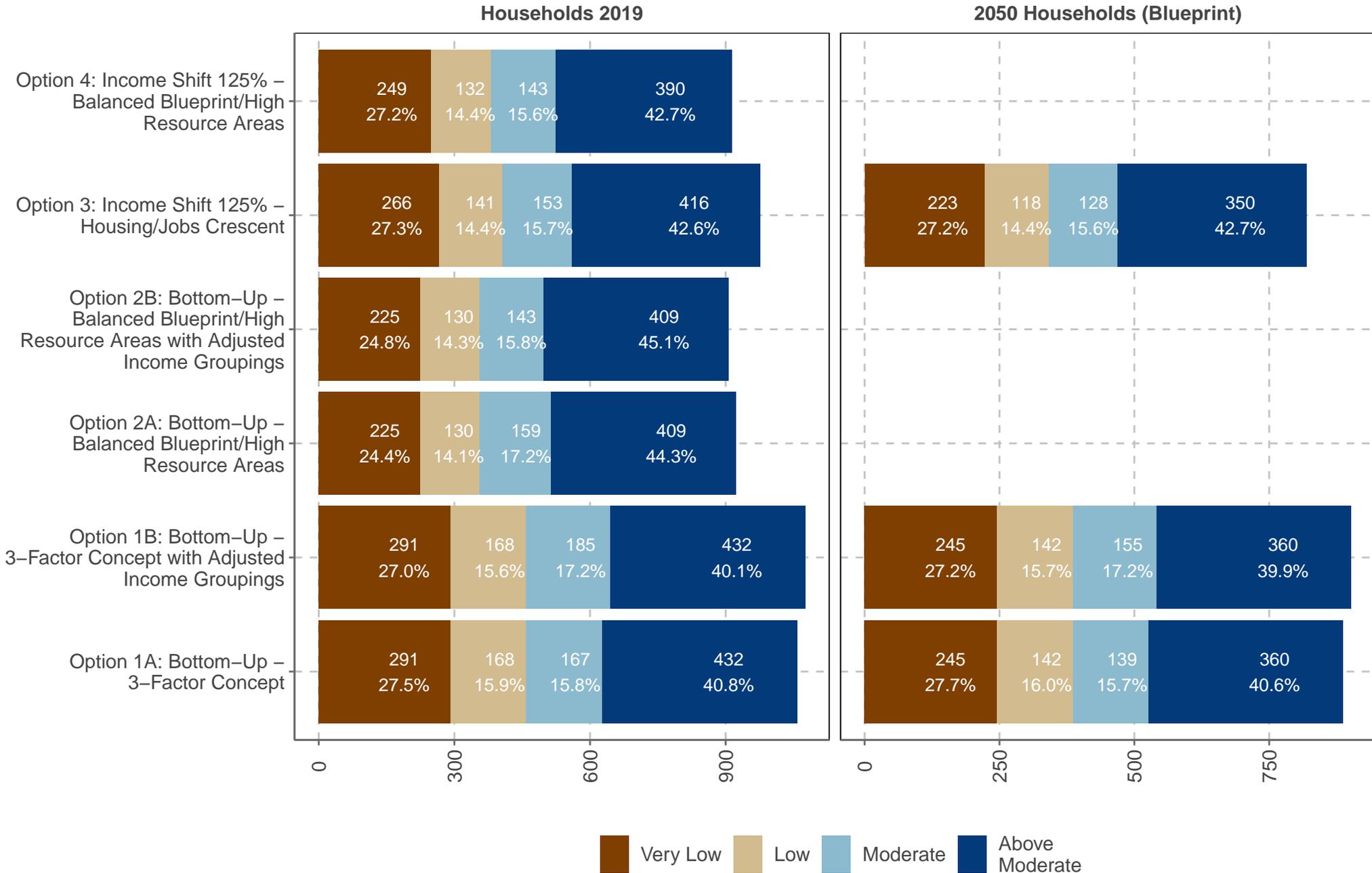
**Appendix 4: Potential RHNA Allocation, Income Distribution
Uninc. Sonoma
(2019 households: 54038)
(Sonoma County)**

Map shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details.
Label shows allocation rounded to nearest 10.



Appendix 4: Potential RHNA Allocation, Income Distribution Windsor (2019 households: 9112) (Sonoma County)

Map shows a RHNA allocation for the methodology concept and baseline listed below. See Item 5a memo for details. Label shows allocation rounded to nearest 10.

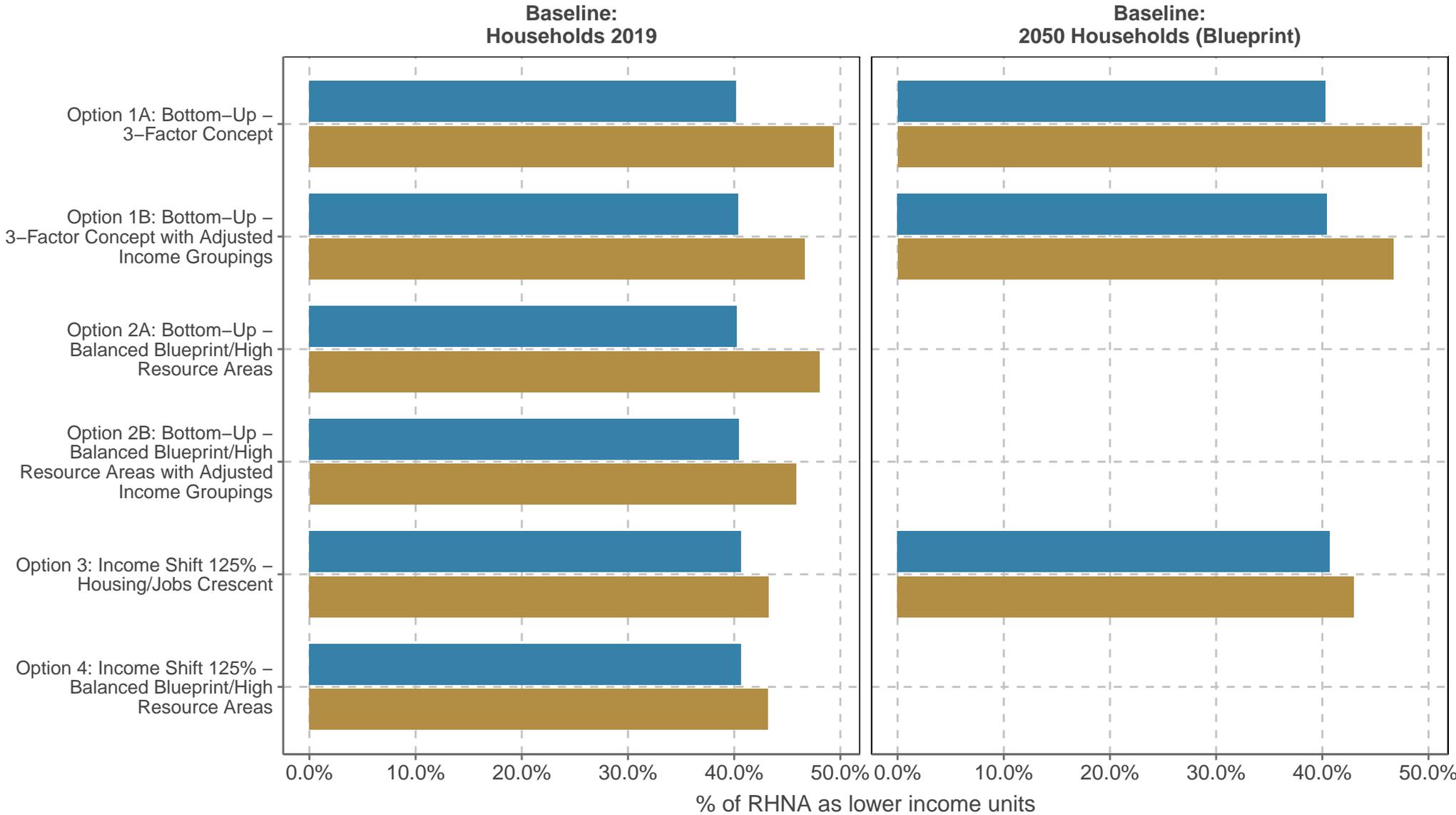


County	Variant	Option 1A: Bottom-Up - 3-Factor Concept										Option 1B: Bottom-Up - 3-Factor Concept with Adjusted Income Groupings										Option 2A: Bottom-Up - Balanced Blueprint/High Resource Areas										Option 2B: Bottom-Up - Balanced Blueprint/High Resource Areas with Adjusted Income Groupings										Option 3: Income Shift 125% - Housing/Jobs Crescent										Option 4: Income Shift 125% - Balanced Blueprint/High Resource Areas									
		2050 Households (Blueprint)					Households 2019					2050 Households (Blueprint)					Households 2019					2050 Households (Blueprint)					Households 2019					2050 Households (Blueprint)					Households 2019					2050 Households (Blueprint)					Households 2019														
		VLI	LI	MOD	MOD+	Total	VLI	LI	MOD	MOD+	Total	VLI	LI	MOD	MOD+	Total	VLI	LI	MOD	MOD+	Total	VLI	LI	MOD	MOD+	Total	VLI	LI	MOD	MOD+	Total	VLI	LI	MOD	MOD+	Total	VLI	LI	MOD	MOD+	Total	VLI	LI	MOD	MOD+	Total	VLI	LI	MOD	MOD+	Total										
Alameda	Jurisdiction	1,190	680	680	1,770	4,340	1,360	780	790	2,040	4,980	1,190	680	760	1,770	4,410	1,360	780	860	2,040	5,050	1,420	820	730	1,880	4,850	1,420	820	900	1,880	5,020	1,190	660	730	1,950	4,530	1,360	760	840	2,220	5,180	1,300	720	800	2,120	4,940															
	Alameda	280	160	160	400	1,010	320	190	180	470	1,160	320	190	210	470	1,100	340	190	210	470	1,130	340	190	210	470	1,130	340	190	210	470	1,130	280	150	170	470	1,070	320	180	190	540	1,220	300	160	180	500	1,140															
Alameda	Berkeley	1,950	1,130	1,200	3,100	7,380	2,360	1,360	1,460	3,780	8,960	1,950	1,130	1,240	3,100	7,420	2,360	1,360	1,500	3,780	9,000	2,310	1,330	1,170	3,020	7,810	2,310	1,330	1,470	3,020	8,160	1,760	1,090	1,250	3,250	7,360	2,140	1,320	1,520	3,930	8,910	1,920	1,190	1,360	3,530	7,990															
	Dublin	1,000	580	380	990	2,960	1,160	660	450	1,160	3,430	1,000	580	640	990	3,210	1,160	660	740	1,160	3,710	1,230	710	580	1,490	4,000	1,230	710	780	1,490	4,210	1,080	600	630	1,400	3,710	1,260	700	730	1,610	4,290	1,200	670	700	1,540	4,120															
Alameda	Emeryville	480	280	400	1,040	2,200	280	160	240	1,300	480	280	300	1,040	2,100	280	160	180	620	1,240	160	90	120	300	670	160	90	100	300	650	380	230	250	630	1,480	220	140	150	370	880	170	100	110	280	660																
	Fremont	3,760	2,160	1,670	4,330	11,920	3,760	2,160	1,700	4,390	12,010	3,760	2,160	2,390	4,330	12,630	3,760	2,160	2,390	4,310	12,700	4,090	2,350	2,060	5,330	13,830	4,090	2,350	2,600	5,330	14,360	4,040	2,240	2,380	5,660	14,330	4,070	2,260	2,390	5,680	14,400	3,990	2,220	2,340	5,570	14,120															
Alameda	Hayward	1,190	690	850	2,210	4,940	1,500	860	1,080	2,810	6,260	1,190	690	760	2,210	4,850	1,500	860	950	2,810	6,120	1,200	690	860	2,230	5,000	1,080	560	660	1,930	4,230	1,370	710	830	2,430	5,340	1,260	660	770	2,250	5,340																				
	Livermore	1,240	710	600	1,540	4,100	1,260	720	610	1,590	4,180	1,240	710	790	1,540	4,290	1,260	720	800	1,590	4,370	1,220	700	690	1,800	4,420	1,220	700	780	1,800	4,500	1,270	680	750	1,860	4,560	1,290	700	770	1,890	4,640																				
Alameda	Newark	580	340	330	860	2,110	520	300	300	780	1,910	580	340	370	860	2,150	520	300	330	780	1,940	410	240	270	690	1,600	410	240	260	690	1,600	540	290	290	800	1,910	490	260	260	720	1,730	450	240	240	660	1,600															
	Oakland	7,020	4,040	5,380	13,920	30,350	6,440	3,710	5,000	12,930	28,080	7,020	4,040	4,460	13,920	29,430	6,440	3,710	4,090	12,930	27,180	6,180	3,560	4,520	11,700	25,950	6,180	3,560	4,420	12,490	26,900	5,740	3,520	4,080	11,510	24,860	5,920	3,630	4,210	11,870	25,620																				
Alameda	Piedmont	160	90	80	200	530	230	130	110	280	760	160	90	100	200	550	230	130	150	280	800	220	120	100	260	700	220	120	140	260	740	170	90	100	200	560	240	130	140	280	800	220	120	130	250	720															
	Pleasanton	1,370	790	540	1,390	4,090	1,520	880	600	1,570	4,580	1,370	790	870	1,390	4,430	1,520	880	970	1,570	4,940	1,570	900	1,000	1,900	5,100	1,570	900	1,000	1,900	5,360	1,440	840	850	1,950	5,080	1,610	940	950	2,170	5,070																				
Alameda	San Leandro	820	470	680	1,760	3,730	1,020	590	860	2,210	4,680	820	470	520	1,760	3,570	1,020	590	650	2,210	4,470	770	440	490	1,410	3,170	770	440	490	1,410	3,170	680	380	460	1,300	2,830	850	480	580	1,630	3,540																				
	Unincorporated Alameda	1,320	760	700	1,800	4,580	1,770	1,020	940	2,430	6,150	1,320	760	840	1,800	4,730	1,770	1,020	1,120	2,430	6,340	1,760	1,020	1,120	2,430	6,500	1,620	670	800	2,370	4,960	1,500	910	1,080	3,160	6,640																									
Contra Costa	Union City	750	430	420	1,080	2,680	820	470	460	1,200	2,960	750	430	480	1,080	2,740	820	470	520	1,200	3,020	610	350	400	1,020	2,370	670	350	380	1,010	2,400	740	390	410	1,110	2,650																									
	Antioch	840	480	480	1,250	3,060	1,020	590	590	1,520	3,720	840	480	540	1,250	3,110	1,020	590	650	1,520	3,770	850	490	610	1,570	3,510	850	490	540	1,570	3,450	720	390	470	1,370	2,940																									
Contra Costa	Brentwood	530	300	280	740	1,860	610	350	330	860	2,140	530	300	340	740	1,910	610	350	380	860	2,200	480	280	340	890	1,990	480	280	390	890	1,990	550	300	330	860	2,040	530	290	320	830	1,970																				
	Clayton	180	100	60	150	490	230	140	80	200	640	180	100	110	150	550	230	140	150	200	720	230	130	100	270	740	230	130	140	270	780	230	130	140	270	780	220	120	130	250	720																				
Contra Costa	Concord	1,160	660	710	1,850	4,380	1,440	830	900	2,340	5,520	1,160	660	730	1,850	4,400	1,440	830	920	2,340	5,530	1,240	710	830	2,140	4,920	1,240	710	790	2,140	4,880	1,060	570	650	1,880	4,160	1,330	720	820	2,360	5,230																				
	Darville	640	370	230	580	1,820	900	520	320	830	2,580	640	370	410	580	2,000	900	520	570	830	2,830	880	510	410	1,050	2,850	880	510	560	1,050	3,010	650	360	380	850	2,240																									
Contra Costa	El Cerrito	320	180	230	590	1,320	360	210	260	670	1,490	320	180	200	590	1,290	360	210	230	670	1,460	290	170	190	490	1,140	290	170	190	490	1,140	320	190	200	520	1,230																									
	Hercules	200	120	130	340	800	260	150	170	440	1,030	200	120	130	340	800	260	150	170	440	1,020	210	120	140	370	840	200	100	110	280	690	250	130	150	360	890																									
Contra Costa	Lafayette	420	240	180	480	1,320	500	290	220	570	1,580	420	240	270	480	1,400	500	290	320	570	1,670	540	310	340	650	1,750	540	310	340	650	1,750	460	260	260	620	1,600																									
	Larkspur	380	220	220	560	1,380	540	310	310	800	1,950	380	220	240	560	1,410	540	310	340	800	1,990	520	300	290	760	1,900	390	210	220	600	1,430	550	300	320	850	2,010																									
Contra Costa	Marinez	280	160	110	300	850	300	170	120	320	920	280	160	180	300	920	300	170	190	320	980	320	180	150	380	1,020	320	180	200	380	1,080	300	160	180	400	1,040	320	180	200	420	1,110																				
	Oakley	320	180	180	460	1,150	360	210	200	520	1,290	320	180	200	460	1,170	360	210	230	520	1,310	300	170	210	540	1,220	300	170	190	540	1,200	300	150	180	480	1,100																									
Contra Costa	Orinda	280	160	130	330	890	350	200	160	430	1,150	280	160	180	330	940	350	200	220	430	1,210	380	220	180	460	1,240	380	220	240	460	1,310	300	180	190	380	1,040																									
	Pinole	180	100	120	300	700	220	120	140	360	840	180	100	120	300	700	220	120	140	360	840	170	100	120	300	680	170	100	110	300	670	160	80	100	260	600																									
Contra Costa	Pittsburg	520	300	320	840	1,970	640	370	400	1,040	2,450	520	300	330	840	1,980	640	370	400	1,040	2,450	530	300	370	960	2,130	540	320	280	850	1,800	550	290	350	1,050	2,240																									
	Pleasant Hill	510	290	240	630	1,670	600	350	290	760	2,000	510	290	320	630	1,750	600	350	380	760	2,090	600	350	380	800	2,130	510	280	300	770	1,860																														
Contra Costa	Rickwood	1,150	660	840	2,110	4,820	1,320	780	630	2,170	4,720	1,150	660	730	2,170	4,720	1,320	780	840	2,170	4,840	1,320	780	840	2,170	4,840	1,420	820	840	2,170	4,990	1,420	820	840	2,170	4,990																									
	San Pablo	220	120	160	410	910	280	160	210	530	1,170	220	120	140	410	890																																													

Appendix 6: Potential RHNA Performance Measures

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



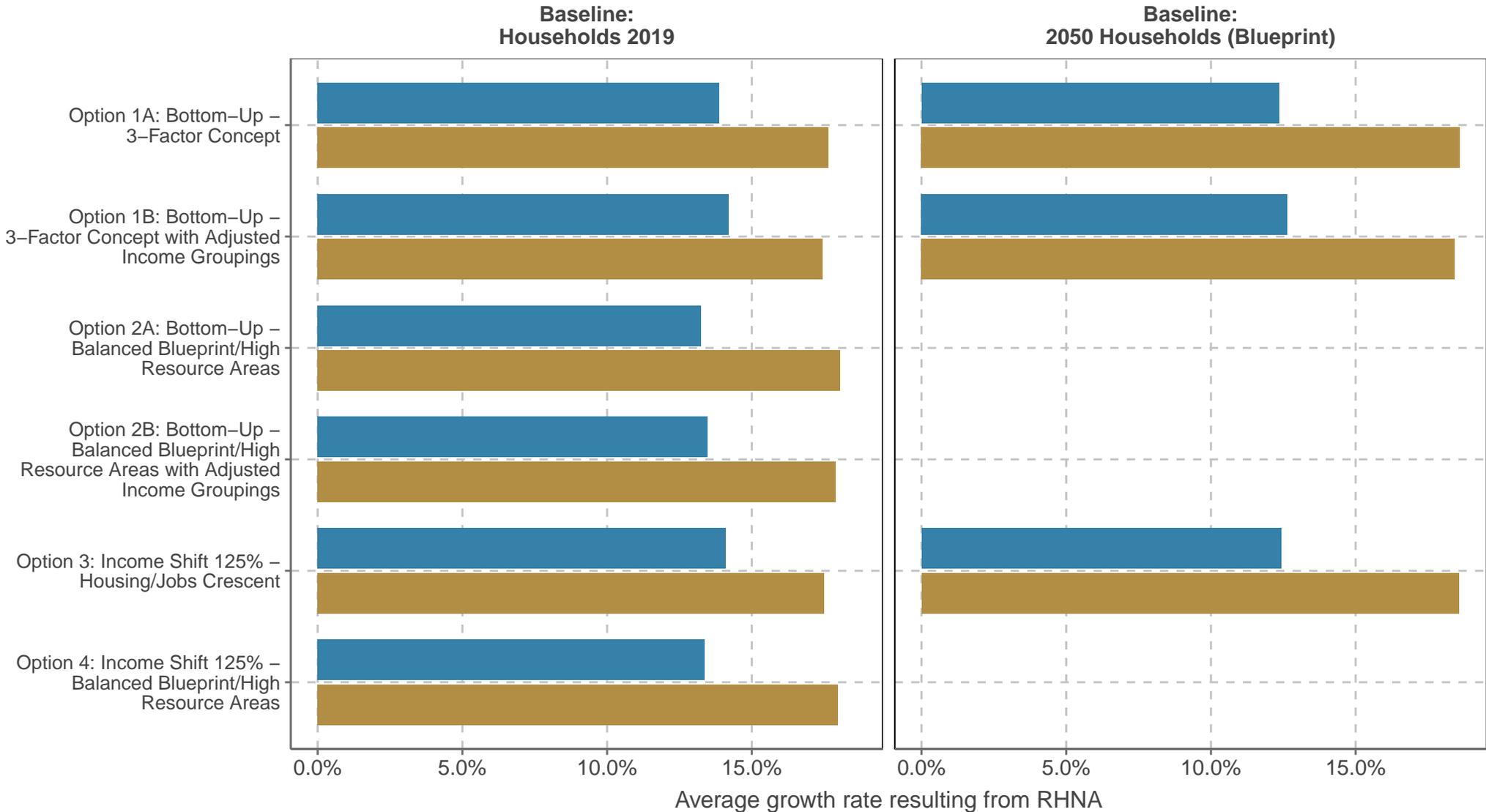
City Grouping (May vary by measure)

- 25 jurisdictions with most expensive housing costs
- Other jurisdictions

Appendix 6: Potential RHNA Performance Measures

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?

METRIC 2a: Do jurisdictions with the largest share of the region's jobs have the highest growth rates resulting from RHNA?



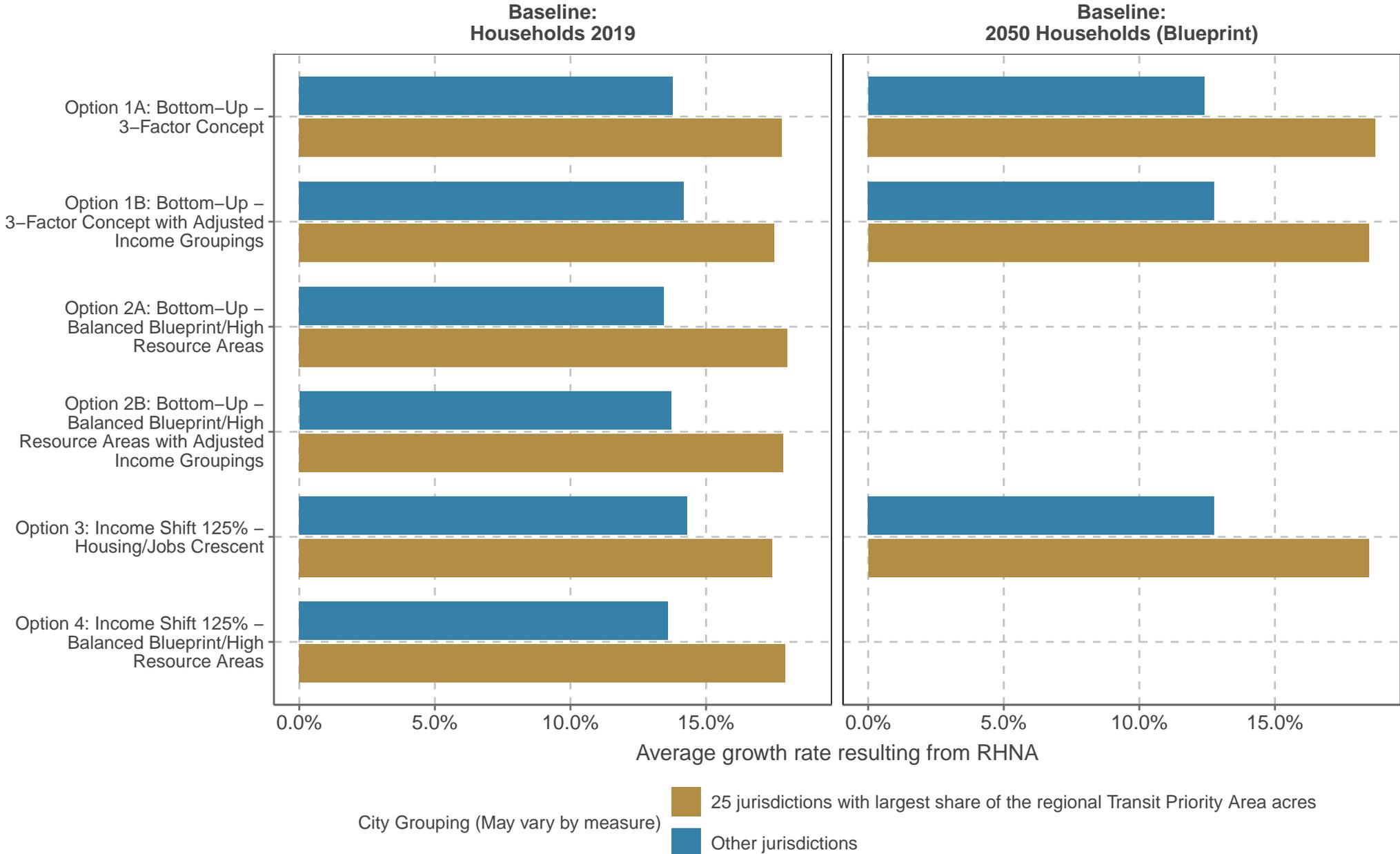
City Grouping (May vary by measure)

- 25 jurisdictions with the largest share of regional jobs
- Other jurisdictions

Appendix 6: Potential RHNA Performance Measures

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?

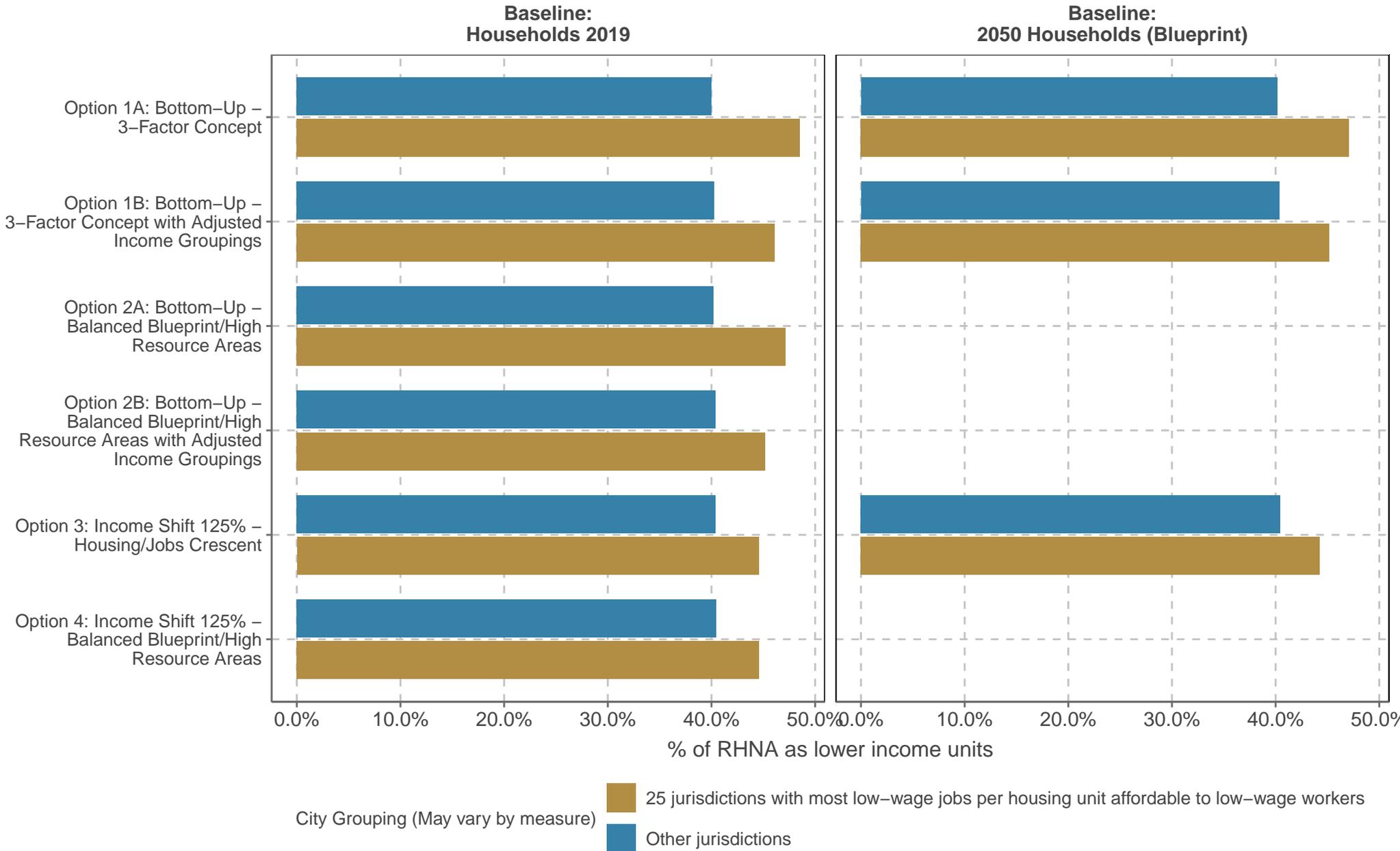
METRIC 2b: Do jurisdictions with the largest share of the region's Transit Priority Area acres have the highest growth rates resulting from RHNA?



Appendix 6: Potential RHNA Performance Measures

OBJECTIVE 3: 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?

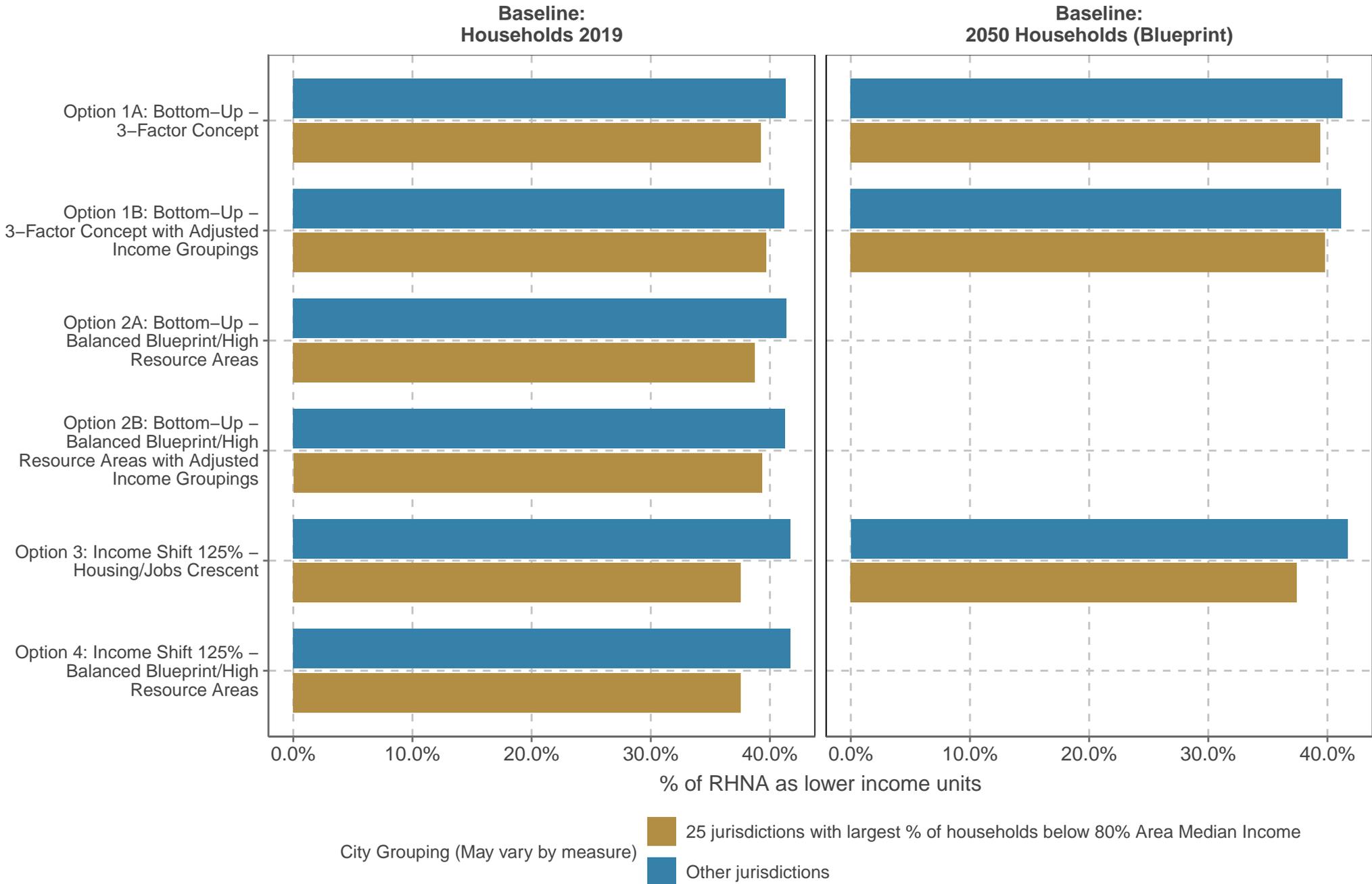
METRIC 3a: Do jurisdictions with the most low-wage workers per housing unit affordable to low-wage workers receive a significant percentage of their RHNA as lower-income units?



Appendix 6: Potential RHNA Performance Measures

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?

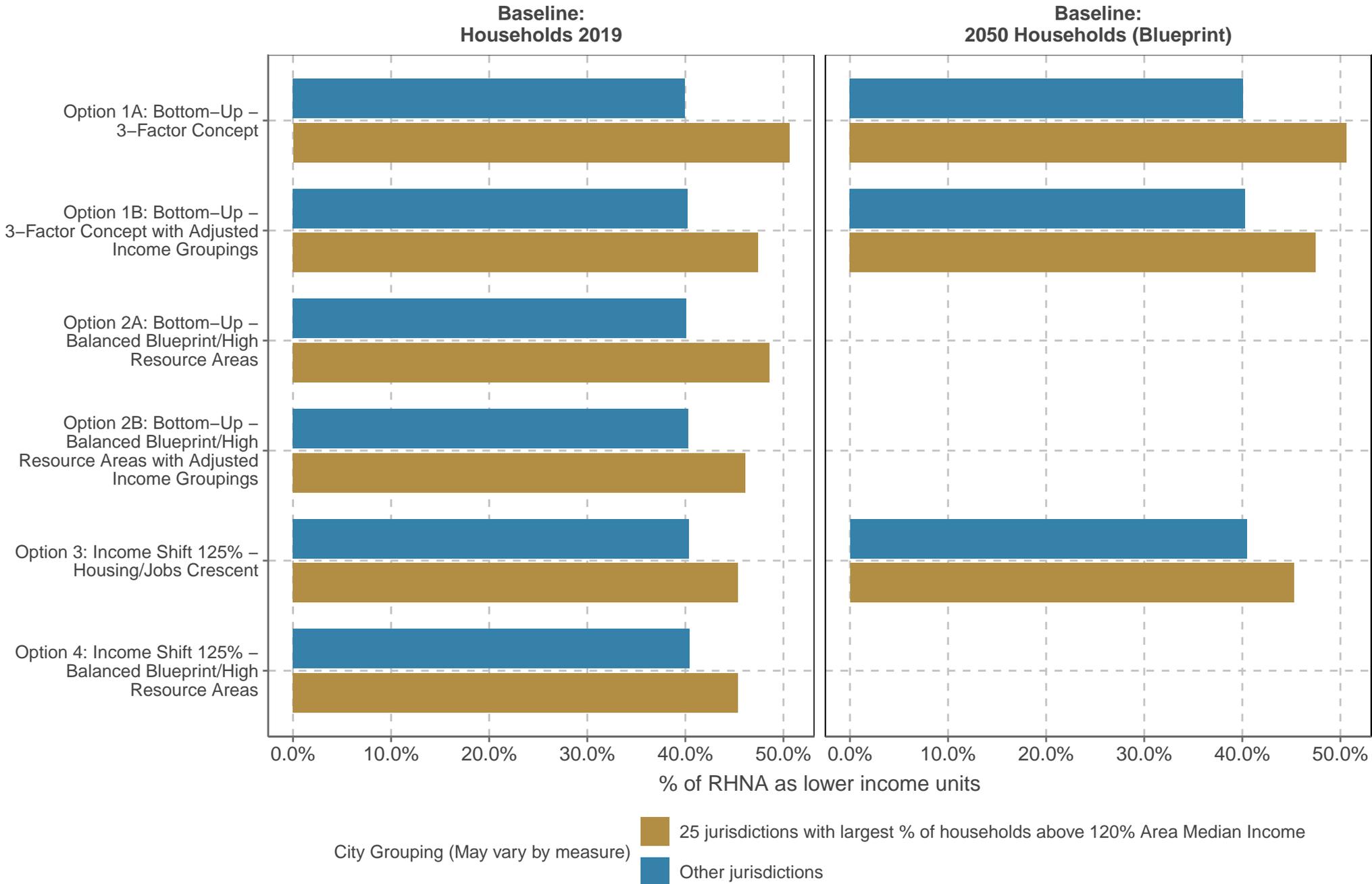
METRIC 4a: Lower Income RHNA in Areas with High Share of Low-Income Households



Appendix 6: Potential RHNA Performance Measures

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?

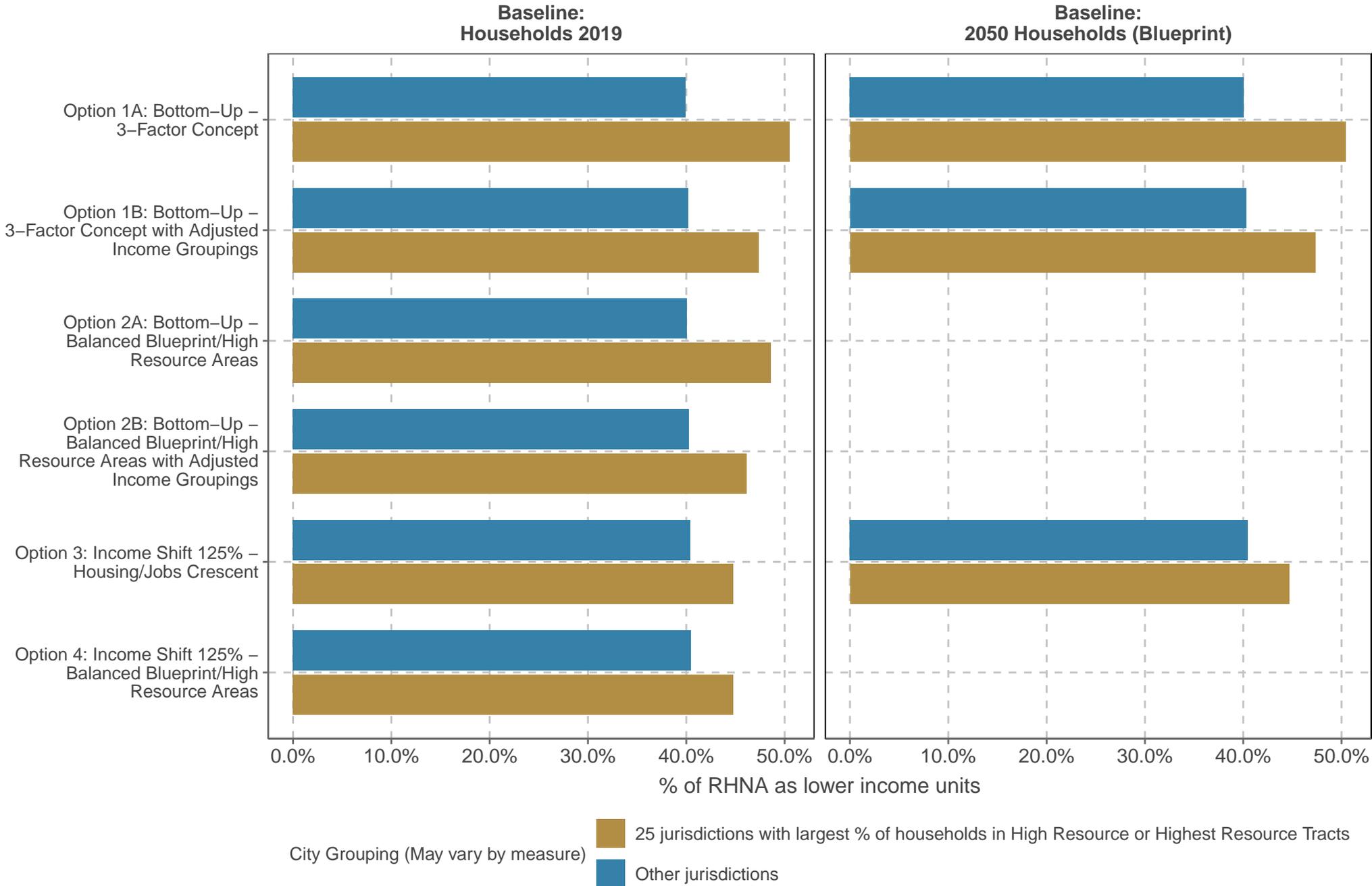
METRIC 4b: Lower Income RHNA in Areas with High Share of High-Income Households



Appendix 6: Potential RHNA Performance Measures

OBJECTIVE 5: Does the allocation affirmatively further fair housing?

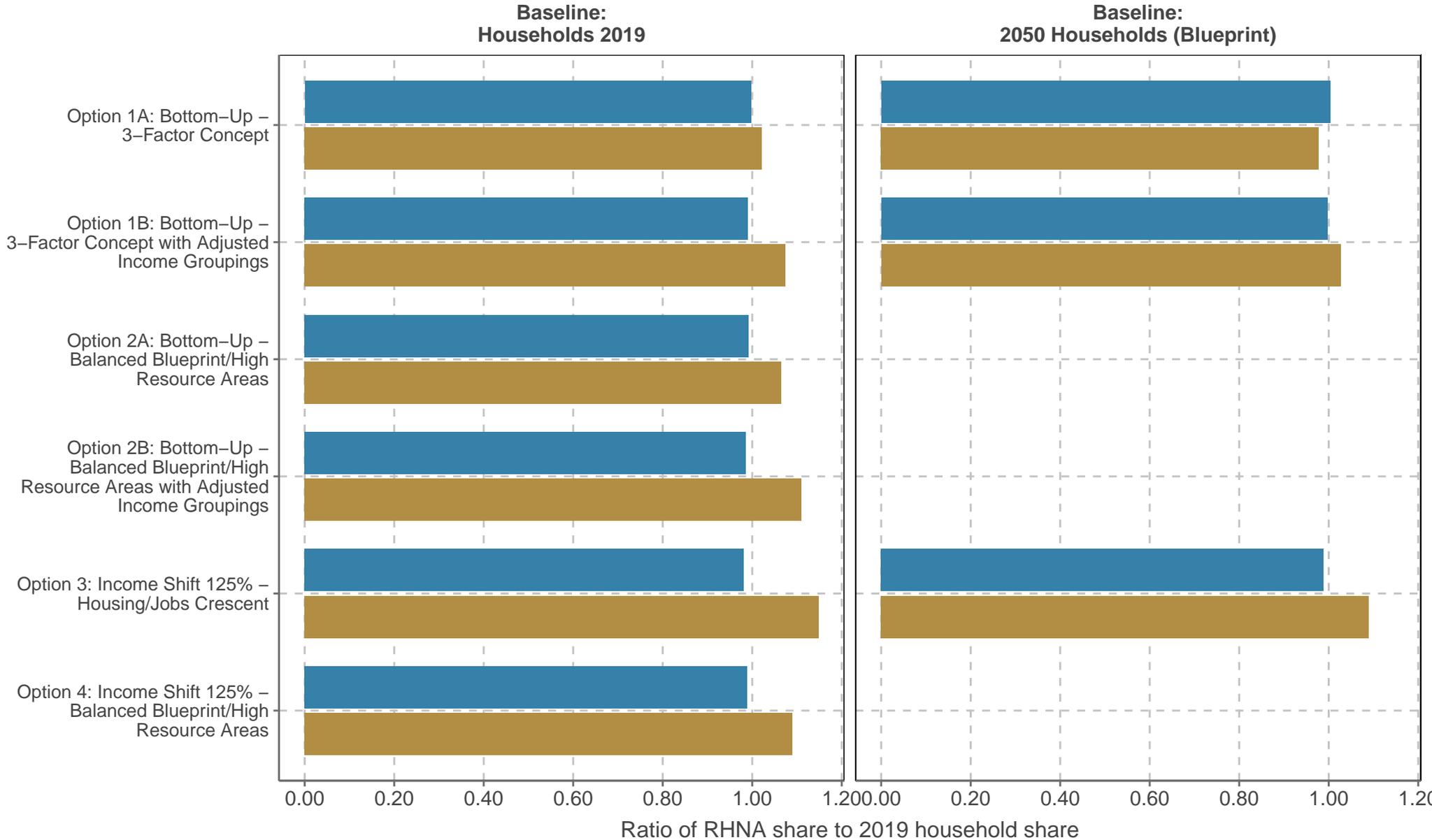
METRIC 5a: Do jurisdictions with the largest percentage of households living in High or Highest Resource tracts receive a significant percentage of their RHNA as lower-income units?



Appendix 6: Potential RHNA Performance Measures

OBJECTIVE 5: Does the allocation affirmatively further fair housing?

METRIC 5b: Do racially and economically exclusive jurisdictions receive allocations proportional to their share of the region's households?



City Grouping (May vary by measure)

- Other jurisdictions
- Jurisdictions with above-average divergence scores and % of households above 120% Area Median Income



P.O. Box 3144
Los Altos, CA 94024
www.citiesassociation.org
408-766-9534

August 10, 2020

Association of Bay Area Governments and Metropolitan Transportation Commission
Bay Area Metro Center
375 Beale Street, Suite 800
San Francisco, CA 94105-2066
Via E-mail: info@planbayarea.org

Re: Planning Collaborative Comments on Plan Bay Area 2050 DRAFT Blueprint

Dear ABAG Executive Board and MTC Commissioners:

On behalf of the Cities Association of Santa Clara County Planning Collaborative which includes the fifteen cities and the county, we offer our comments on the Draft Blueprint for Plan Bay Area (PBA) 2050.

As a general vision for the future growth and evolution of the Bay Area through 2050, the Blueprint sets forth an ambitious agenda for addressing the region's challenges and directing growth. While we understand your goal is to create a more affordable, connected, diverse, healthy and vibrant Bay Area, we have concerns that the Blueprint fails to do so.

While the Cities Association of Santa Clara County Planning Collaborative endorses the Blueprint's guiding principles, we have a number of concerns about how the Blueprint will achieve the key goals of the Sustainable Communities Strategy (SCS) and requirements of SB 375, as well as the feasibility and practicality of implementing the PBA Blueprint in Santa Clara County as a whole as well as for its individual jurisdictions, as enumerated below:

- 1. Does not Achieve Key Goal of the Sustainable Communities Strategy.** The primary goal of the regional SCS per the requirements of SB 375 is to link household and employment growth to transit infrastructure and services to reduce VMT and GHG emissions. Unfortunately, the PBA 2050 falls short of this goal because it locates a large percentage of growth in areas that do not currently have excellent access to transit (i.e. Santa Clara County communities). Even with new investments in transit infrastructure in Santa Clara County by BART and VTA, the cities in Santa Clara County are not as well served by transit than cities such as San Francisco, Oakland and Berkeley. While the Cities Association maintains a strong commitment to investing in new transit facilities and related community development, we believe that it is a strategic mistake for the region to actively plan for a level of housing and employment growth in Santa Clara County that could not possibly be accommodated in transit and service rich neighborhoods during the PBA time frame.
- 2. Unrealistic Household and Employment Growth Targets for Santa Clara County.** The Draft Blueprint allocates 41% of the region's household growth and 44% of the region's employment growth to Santa Clara County. For Santa Clara County jurisdictions, this level of future growth is both unrealistic and unsustainable based on current and projected levels of infrastructure spending. Our local cities, school districts, transportation agencies, utility

providers, special districts, etc. are unable to provide the necessary services and infrastructure that would be required for this level of new development. Even with significant new infrastructure spending measures at the jurisdictional, sub-regional or regional levels, this level of growth would still likely be unrealistic within PBA time frame.

3. **Potential Impact of the Draft Blueprint assumptions on the Regional Housing Needs Allocation Housing Methodology.**

The RHNA Housing Methodology Committee will be making a recommendation to ABAG's Executive Board on whether RHNA for the region should be based on Plan Bay Area or existing households in addition to other demographic factors. The Cities Association does not recommend using the Plan Bay Area assumptions in the RHNA process for the following reasons:

- **Timing.** Public comment on the PBA Blueprint ends August 10, with the Final Blueprint scheduled for adoption in late 2020. Based on their existing schedule, the HMC won't have time to recommend adjustment or modification of the RHNA methodology based on the Final Blueprint.
- **Double-Counting of Factors.** Plan Bay Area is presumed to include some of the same inputs as the RHNA process, such as a focus on access to jobs. While these are important factors, they could be double counted through the RHNA process, especially since the HMC and jurisdictions' staffs have had less opportunity to review and understand the PBA model.
- **Locating Growth in the Regional Transit-Oriented, Jobs-Rich Core.** As noted above, several major cities in the region's transit-oriented, jobs-rich core, including San Francisco and Berkeley, would receive *less allocation than the regional average (16%)*. This seems to conflict with the PBA's goals of focusing growth near jobs, high-quality transit and existing infrastructure. This is especially problematic since most of the region's proposed transportation funding (approximately 75%) is scheduled for the maintenance and operation of existing transportation infrastructure.
- **Lack of Access to Transit.** The PBA options reveal a large percentage of projected growth within Santa Clara County cities. While as a whole Santa Clara County cities do have large parcels of underutilized land to accommodate additional growth, the area's transportation system is not well equipped to provide viable transportation options for new residents to help meet the Plan's GHG reduction targets. If these PBA options become part of the final RHNA determination, the Cities Association recommends that an equivalently proportional amount of transportation funding be allocated to Santa Clara County to support the transit improvements necessary to support this growth and reduce VMT and GHG emissions, per the goals of the SCS.
- **Unachievable Housing Targets.** Combining the PBA Baseline Option with some of the RHNA allocation factors already studied could create an extraordinary housing allocation for Santa Clara County jurisdictions to achieve within the eight-year time frame of the next Housing Element. In some instances, these increases could

represent a 30 to 50% increase over existing households. These are unrealistic assumptions which would not be achieved, especially considering that many of our jurisdictions have to largely rely on redevelopment of infill sites for housing growth.

The Cities Association of Santa Clara County Planning Collaborative wholly recognizes our regional responsibility to add housing to meet the current housing crisis and future growth needs. Many of our jurisdictions have already planned for significant housing growth by rezoning major employment and commercial areas and adopting policies mandating the development of housing supply in tandem with new jobs added to achieve a jobs-housing balance. However, the household and employment growth projected in the PBA Draft Blueprint would simply be unrealistic and at odds with the SCS stated goals of creating, affordable, connected, diverse, healthy and vibrant communities. We strongly recommend a recalibration of the PBA Blueprint employment and household projections for Santa Clara County to produce practical and implementable targets that are more consistent with the ability of our communities to grow sustainably over the next 30 years.

Sincerely,



Larry Klein
President, CASCC
Mayor, City of Sunnyvale

cc: Therese McMillan, Executive Director
Bradford Paul, Deputy Executive Director, Local Government Services

Fred Castro

From: slevy@ccsce.com
Sent: Wednesday, August 12, 2020 12:47 PM
To: MTC-ABAG Info
Cc: Dave Vautin
Subject: Thursday RHNA Allocation Methodology Committee meeting
Attachments: RHNA Letter August 2020 (2).pdf

External Email

Dear Committee members and staff,

My city council (Palo Alto) has just approved a letter asking ABAG to adopt the methodology (just 2019 HH) that results in the lowest allocation to my city.

As a 50 year resident and regional economist, I support using the equity (high resource/opportunity) area criterion and the existing jobs imbalance and access to transit criterion to achieve equity and GHG reduction goals.

In my letter to my council I wrote:

"I support the ABAG methodology committee direction shown in the staff memo to allocate an above average share of the regional allocation to communities that are considered "high opportunity" areas (their equity criterion) and to communities with large existing excesses of jobs over housing and also good access to public transit (their jobs criterion).

I find the research of Raj Chetty and Sean Reardon at Stanford compelling on the benefits to children in low income families of being in neighborhoods with good schools and social infrastructure like Palo Alto. I also note that council used this evidence as one piece of their Buena Vista decision and funding (the city and county purchased the mobile home park to allow mostly Latino resident to remain with their children in PA schools."

I find this research on the impact of neighborhoods on outcomes and opportunities for low income residents compelling and it points to an above allocation of RHNA totals to communities on the peninsula. I do note that San Jose is in a different position somewhat as it has an excess of workers compared to jobs.

Finally I am attaching the letter Palo Alto Forward submitted to our council (we are currently working on a SVCF grant to broader voices in PA on housing) to show that not all PA residents support minimizing our housing goals.

Stephen Levy

Director Center for Continuing Study of the California Economy

PALO ALTO FORWARD

August 1st, 2020

Re: Item #11, August 3rd - Summary Title: PBA 2050 / RHNA Update

To: Mayor Adrian Fine, and City Council Members

Dear Mayor Fine and Council members,

Palo Alto Forward thanks the staff for the excellent summary of the Bay Area RHNA development process. The material summarized the progress of the ABAG methodology committee discussions regarding allocating the regional total to cities.

As the memo notes, roughly half of the regional allocation is not related to growth but to statutory state requirements, some of which are new to this cycle. I have attached the HCD determination letter so council members can see the contribution of the new factors--reducing the number of overcrowded and cost-burdened households and the contribution of existing factors--moving toward a more "normal" vacancy rate and replacing demolished units as a means to not create a further deficit of housing units.

With regard to the allocation methodology Palo Alto Forward favors the three allocation metrics shown on page 5 of the staff report. These metrics will prioritize communities with access to high opportunity areas and communities with large excesses of jobs versus housing units. Palo Alto Forward supports efforts to increase housing in resource rich cities like ours. The proposal the committee currently favors has a 50% weight for access to high opportunity areas and a 40% weight to job factors including access to transit..

While these allocation factors will result in more units allocated to Palo Alto than the staff proposal, we believe they are the fairest way to allocate new housing. A lower target for Palo Alto will simply shift housing allocations to communities that less meet the equity and job imbalance criteria.

Achieving these goals will be hard for all communities but the Housing Element requirement is to identify sites, zoning and policies to meet the requirements. To that end Palo Alto Forward encourages the council and staff to begin now to think about the Housing Element update, which will require thoughtful and innovative elements no matter what Palo Alto's allocation is.

Gail A. Price

President, Palo Alto Forward Board



August 7, 2020

Mayor Jesse Arreguin, Chair
Association of Bay Area Governments
Housing Methodology Committee
375 Beale Street, Suite 700
San Francisco, CA 94105

RE: Support for the **Plan Bay Area 2050** Baseline Data Methodology

Chair Arreguin,

The Contra Costa Mayors Conference, representing all 19 cities in Contra Costa county, wishes to convey our appreciation for the Housing Methodology Committee's work on evaluating housing allocation methodologies for the next RHNA cycle (2023-2031).

We recognize that it is a daunting task, not only because of the collective recognition to provide more housing that is affordable to a wide range of income levels but also because we can't forget that *where* we distribute the 441,176 housing unit assignment by California Department of Housing and Community Development (HCD) to the Bay Area is just as important to the overall quality of life for all residents in the Bay Area.

In light of these considerations, the Contra Costa Mayors Conference supports and endorses the use of **Plan Bay Area 2050** as the baseline data methodology because it is consistent with the decades-long region-wide effort to:

1. **Encourage housing development in proximity to jobs**, which would in turn;
2. **Reduce transit and transportation congestion**, helping to alleviate long region wide commutes; and
3. **Reduce greenhouse gas emissions**, consistent with both AB 32 and SB 375.

It is of great concern to Contra Costa communities that the alternative “2019 Baseline Household” method would *reverse* the decades-long region-wide effort to reduce traffic congestion and GHG emissions through a greater jobs-housing balance. We appreciate your consideration of our perspective and recommendation.

Sincerely,

/Signed/

Gabriel Quinto, Conference Chair
Contra Costa Mayors Conference

Contra Costa Mayors Conference Membership

<i>City of Antioch</i>	<i>City of Oakley</i>
<i>City of Brentwood</i>	<i>City of Orinda</i>
<i>City of Clayton</i>	<i>City of Pinole</i>
<i>City of Concord</i>	<i>City of Pittsburg</i>
<i>Town of Danville</i>	<i>City of Pleasant Hill</i>
<i>City of El Cerrito</i>	<i>City of Richmond</i>
<i>City of Hercules</i>	<i>City of San Pablo</i>
<i>City of Lafayette</i>	<i>City of San Ramon</i>
<i>City of Martinez</i>	<i>City of Walnut Creek</i>
<i>Town of Moraga</i>	



CITY OF
**PALO
ALTO**

OFFICE OF THE CITY MANAGER

250 Hamilton Avenue, 7th Floor
Palo Alto, CA 94301
650.329.2392

Date: August 11, 2020

Housing Methodology Committee (HMC) Members, info@bayareametro.gov
ABAG Regional Housing Needs Allocation Staff, RHNA@bayareametro.gov
Fred Castro, Clerk of the Board, Association of Bay Area Governments,
fcastro@bayareametro.gov

Re: City of Palo Alto Initial Comments on 6th Cycle RHNA Methodology Options

Thank you, Committee members, for your time, expertise and commitment to designing a methodology that fairly distributes housing in our region.

Based upon the review of materials through July 2020, the City of Palo Alto requests that the Housing Methodology Committee **recommend use of the 2019 existing households as a baseline allocation for the RHNA methodology** and continue its review of an appropriate mix of weighted factors using up to a 150% Income Shift multiplier to distribute new housing units across the region.

The alternative baseline approach being considered by the Committee is unattainable for some Bay Area jurisdictions and the imposition of this standard ensures some communities will dramatically fail to meet their housing obligation. While those communities will need to contend with that result, including implications associated with SB35, the risk is also that the region as a whole will produce far less housing than it otherwise could achieve.

Plan Bay Area 2050 is a long range plan that requires significant economic investment and an extraordinary amount of regional policy collaboration to implement its vision. Building a methodology today that is actionable over the next eight years and relies on an idealized model depicting a regional housing distribution thirty years from now ignores the reality that the infrastructure, funding and local regulatory framework is simply not yet present to achieve this goal.

Palo Alto supports the regional efforts of Plan Bay Area 2050 and commends agency leadership and staff for their tireless work to create a framework for our future. Palo Alto is a partner in this endeavor and recognizes its role to stimulate more housing – especially more equitable and inclusive housing for all. At the same time, Palo Alto cannot reasonably be expected to increase its housing supply by more than 50% over the next eight years, as would be required under some early modeling results that use the Draft Blueprint as a baseline.



CityOfPaloAlto.org

There will be three and a half regional housing need cycles before the region meets the horizon year of Plan Bay Area 2050. It is imperative that the RHNA methodology be used to shift local policies toward a more inclusive and better balanced future to achieve housing equity and environmental goals. This RHNA methodology needs to bridge where we are today as a region with where we want to go tomorrow.

Using the 2019 existing households as a baseline reflects where we are today, shares the responsibility for adding more housing units throughout the region and is consistent with, but not dependent upon Plan Bay Area 2050. Moreover, weighted factors can be used that stretch communities toward our housing, transportation and environmental goals.

Thank you for your consideration,

DocuSigned by:
Ed Shikada
F2DCA19CCC8D4F9...

Ed Shikada, City Manager

August 6, 2020

Dear ABAG Housing Methodology Committee,

We thank the members of the ABAG Housing Methodology Committee for undertaking the challenging work to develop a fair methodology for the Regional Housing Needs Allocation for the Bay Area region.

In this statewide housing crisis where many residents are spending 30% or more of their income on housing, are spending long hours commuting from more affordable outlying areas, or uprooting to other states, your methodology can be foundational to both increasing the Bay Area's housing supply and providing our residents with improved quality of life in a more balanced, equitable manner.

We request that the Committee strongly factor the significant imbalance among cities throughout our region as it refines the RHNA methodology. Many of our neighboring cities have 2.5 or 3.0 jobs per employed residents. As long as other Bay Area cities undersupply housing relative to their job base, our region will continue to struggle with traffic congestion and the accompanying air quality and quality of life issues. Now more than ever, a collective vision for our region should be one where more workers have the opportunity to live and prosper within the community in which they work.

The City of San José has and continues to proactively plan for the housing needs of the existing and future residents of our community. The Envision San Jose 2040 General Plan provides a policy framework to accommodate growth by adding 120,000 new residences by 2040. These residences are planned in densified mixed-use, walkable urban villages, located on transit lines, close to and often integrated with jobs-based development and the services and amenities that residents need. This approach not only reduces vehicle miles traveled and greenhouse gas emissions but supports an improved quality of life and placemaking.

For the nearer term, the San José City Council approved a Housing Crisis Workplan to support a goal of 25,000 new homes, with at least 10,000 of those affordable, to be constructed or entitled by 2022. A multi-department Housing Catalyst Team has been established to craft needed policy and ordinance changes that will drive this housing development.

While San José is being proactive to plan and build new housing for all income levels, we are also planning for significant job growth to become a more balanced city. Unlike the other cities in Silicon Valley, San José has significantly fewer jobs than employed residents. With only 0.82 jobs per employed resident, San José is in fact the largest "bedroom community" in the United States. Of the nation's 20 largest cities, San José is the only one with a larger nighttime population of residents than daytime population of employees.

Letter to ABAG Housing Methodology Committee
August 6, 2020
Page 2 of 2

This imbalance has resulted in significant negative impacts to the region's environment, residents' quality of life, and San Jose's fiscal stability. Rather than improving, San José's imbalance relative to other South Bay cities grew more extreme during the economic expansion of the last ten years, as the other cities became even more jobs-rich and housing-poor.

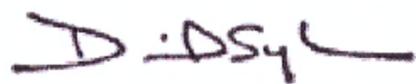
While the environmental and quality of life issues are easily apparent to anyone traveling within Silicon Valley, the less visible fiscal impacts are equally as serious and have resulted in the City facing consistent budgetary challenges even during economic expansions. To illustrate the imbalance, Attachment A displays sales tax per capita during 2018-2019 for San José, neighboring cities, and the State of California. Having a disproportionate share of the housing in the South Bay – at the expense of net positive industrial/commercial land uses – has left San Jose with significantly less revenue per capita to address the very real needs of our diverse community. Even during the height of the recent economic expansion, San Jose struggled to add back services and resources cut during the last recession. As an example, the 2019-2020 budget included 6,647 full-time equivalent (FTE) positions, 11% below the peak of 7,481 FTE in 2001-2002 when San José's population was 12% lower than it is now.

The Bay Area and South Bay need to address the housing crisis but should not do so in a way that further impacts the ability of cities like San Jose to fund critical city services for its residents. We want more of our residents to be able to work in San José – a goal that all cities should embrace in order to reduce commutes, traffic congestion, greenhouse gas emissions, poor air quality, and poor well-being.

We oppose the use of the Plan Bay Area 2050 Blueprint as either a factor or the baseline allocation for RHNA. Despite the Blueprint's effectiveness at promoting equity and improving the jobs-housing balance across the region, it does neither in the context of RHNA. By focusing on South Bay job centers, it allocates more housing to San Jose and ignores cities elsewhere in the region that have undersupplied housing relative to their current job base. This imbalance in the location of housing has contributed to the Bay Area's housing crisis and reinforcing this disparity will not move us toward a more equitable and sustainable future.

Thank you for consideration of our perspective as you move forward with your important work.

Sincerely,



David Sykes
City Manager

Sales Tax Per Capita

Source: Avenu Insights April 2018-March 2019 Sales Period: Benchmark Year 2019 Q1

