

REGIONAL HOUSING NEEDS ALLOCATION



Overview

The following is a summary of the additional comments about the Regional Housing Needs Allocation (RHNA) Local Jurisdiction Survey. This does not include the feedback provided by the Housing Methodology Committee (HMC) at its November 2019 meeting.

Note: Question numbers referenced below refer to the question numbers on the survey draft that was shared with the public as an agenda item for the 11/14/19 Housing Methodology Committee (HMC) meeting. A copy of that survey draft is available [here](#).

General Feedback

- Ensure survey questions correlate only to RHNA-related metrics and inputs. Many housing issues identified at the HMC meeting are more Housing Element policy inputs. (Matt Walsh – Solano County)
- Explain what level of effort is expected in responding, and how answers will be used. Is this background information to provide context for the committee, or will responses be directly input into the ultimate formula? Will the robustness of jurisdictions' responses influence their RHNA outcomes? (Jeff Bond - City of Albany)
- Improve introduction to survey. Is its purpose to (a) identify other data sources related to specific jurisdiction housing challenges and (b) obtain additional information about individual jurisdictions that can factor into ABAG's understanding of what jurisdictions are doing to address housing concerns? Emphasize that survey will enhance the methodology development process and provide more jurisdiction-specific information, and make the point that the survey will inform the decision-making around the RHNA and the methodology. (Jeffery Baird - Baird + Driskell Community Planning)
- Don't need to emphasize that ABAG is doing the survey because state law requires it. Include a reference to state law but then focus on what ABAG is trying to investigate and how that will help with developing the methodology. (Jeffery Baird - Baird + Driskell Community Planning)
- Concern regarding questions that attempt to obtain information about what jurisdictions are doing to address issues because the feedback can't be statistically validated, and it is unclear whether it helps or hurts an individual jurisdiction to provide the information. Add more clarity regarding purposes and uses of the information. (Jeffery Baird - Baird + Driskell Community Planning)
- Confusing that survey questions are organized by housing topic as compared to organizing it by questions related to other sources of data and questions to obtain information about jurisdictions. (Jeffery Baird - Baird + Driskell Community Planning)
- Questions should be clear if they're asking jurisdictions to address existing need or projected (2030) need. (Jeffery Baird - Baird + Driskell Community Planning)
- Enterprise Community Partners proposes three additional questions:
 - Given the unique challenges for meeting RHNA goals for housing affordable to low-income households, as well as the new regional housing finance authority

given to ABAG and MTC via AB 1487, we propose three additional questions to better understand barriers, gaps, and opportunities:

- What are the primary barriers or gaps your jurisdiction faces in meeting its RHNA goals for housing affordable to low-income households?
 - Land use and zoning laws, such as minimum lot sizes, limits on multi-unit properties, height limits, or minimum parking requirements
 - Local gap financing for affordable housing development
 - Local affordable housing development capacity
 - Availability of land
 - Patterns of community opposition
 - Other (please describe):
- If local gap financing is a barrier, what do you estimate is the 1) number of affordable housing units that could be built if local gap financing was available and 2) the amount of gap financing necessary to fund those projects in the pipeline?
- California AB 1487 (2019) established the Bay Area Housing Finance Authority (BAHFA), under shared governance of ABAG and MTC. What types of support would your jurisdiction like to see BAHFA provide to help your jurisdiction meet its RHNA goals and comply with the AFFH requirement?
 - Financing for new construction of affordable housing
 - Financing for the preservation of existing subsidized affordable housing
 - Financing for the preservation of housing that is currently on the private market to make it permanently affordable
 - Technical assistance to determine location to site housing (e.g., feasibility studies, etc.)
 - Technical assistance on land assembly
 - Technical assistance on AFFH requirements
 - Technical assistance on tenant protections
 - Technical assistance on outreach efforts related to housing element updates, particularly robust engagement with community organizations and residents most directly impacted by the housing crisis (e.g., people of color, low-income people, seniors, etc.)
 - Technical assistance to pursue compliance with California HCD's new pro-housing designation or other state regulation
 - Other technical assistance (please describe):
 - Other support (please describe):
- 65584.04(b)(4) says the survey shall state that none of the information received may be used as a basis for reducing the total housing need established for the region pursuant to 65584.01. Did not see that in the survey. (Elise Semonian – Town of San Anselmo)

Relationship Between Jobs and Housing (Questions 1-3)

- Rather than only asking these as opening ended questions, can you add several scaled questions that try and quantify their understanding and beliefs about the impacts of the jobs/housing fit? (Ethan Guy – City of San Rafael)
- Notes on Question #1:
 - Job-housing “fit” is not a useful planning metric for geographically small cities in a large urban area. A 30-minute commute distance covers numerous nearby jurisdictions, and depending on how the commute shed is drawn, could flip the jobs-housing fit in different ways. (Jeff Bond - City of Albany)
 - Include definition of jobs-housing fit in the text, rather than footnote. Include the regional jobs-housing fit ratio in the text of the question; ask respondents to note their jurisdiction’s ratio and mark if it is higher/lower/same than regionwide. (Enterprise Community Partners)
 - To help jurisdictions identify how the federal data sources may not be reflective of their jurisdictions, it would be useful to list known limitations (things not included in the methodology) that may be a significant concern for that jurisdiction, such as agricultural workers, jobs without a set place of employment (e.g., gardeners, nannies, gig workers, etc.), or homeownership. (Enterprise Community Partners)
 - You should also include a question that quantifies the respondents understanding of the metric? i.e How familiar with JHF are you? Does your jurisdiction use JHF to make policy decisions, etc.? (Ethan Guy – City of San Rafael)
 - To make sure they are correct, you should also ask them to enter the JHF ratio, so you can confirm they are basing their answers off the right number. (Ethan Guy – City of San Rafael)
 - Income data by job category (ie, farmworkers or any other category) is available by County with median incomes and by MSAs down to income quartiles, from <https://www.labormarketinfo.edd.ca.gov/data/wages.html#QCEW>. The data is by individual workers, rather than households. (Fernando Marti, Council of Community Housing Organizations)
- Notes on Question #2:
 - Provide a list of items and an “other” category. Maybe it’s a prioritizing list ranking 1, 2, 3, etc. That would seem more helpful than just identifying topics. (Jeffery Baird - Baird + Driskell Community Planning)
 - How is “affordable homes” defined? (Mindy Gentry – City of Concord)
 - Can we provide options or more specificity for what “impacts” we mean? I’m assuming we mean things like commutes, housing cost burden, difficulty hiring and retaining employees? If possible, it would be great to provide them with commute data on low-wage workers who work in their jurisdiction. Do we just want to know about the impacts for the jurisdiction itself or also the residents, employers, etc. located in the jurisdiction? (Enterprise Community Partners)
 - Could this be rephrased to be a scaled questions with this box as chance to explain? For instance, could this question be, How would you rate your Jobs Housing Fit Balance? Very balanced, Balanced, Neither, Imbalanced, Very Imbalanced. (Ethan Guy – City of San Rafael)

- Notes on Question #3:
 - Provide a list of things jurisdictions are doing to address the balance of low-wage workers and affordable housing and an “other” category. Or, maybe the survey question should provide a list and have jurisdictions rank what’s most effective for them in addressing the issue. This is a tough one because it’s not just numbers issues but a match of affordability of housing (market rate and BMR) to job wages. (Jeffery Baird - Baird + Driskell Community Planning)
 - Seems to be based on a false premise seems that this a local issue, when it is at its core a macroeconomic regional issue. (John Swiecki – City of Brisbane)

Housing Opportunities and Constraints (Questions 4-6)

- Notes on Question #4:
 - Suitability should be aligned with what HCD will accept as a housing opportunity site in our next housing element. (Jeff Bond - City of Albany)
 - Reword as “Public or Social Services” (Anita Addison - La Clinica de la Raza)
 - Add “wildland fire risk” (John Swiecki – City of Brisbane)
 - Add “lack of transportation infrastructure” (John Swiecki – City of Brisbane)
 - Add “Project Labor Agreements” (Mindy Gentry – City of Concord)
 - Add “Utility connection fees (Mindy Gentry – City of Concord)
 - Reword the following: Availability of public schools, Availability of public parks, Availability of public services (Enterprise Community Partners)
 - Need to further define or clarify opportunity and constraint. For example: “easier to plan for more housing” or “harder to plan for more housing”. (Enterprise Community Partners)
 - Add “No Issue” as an option in addition to “Opportunity” or Constraint” (Leslie Carmichael – City of Foster City)
 - Is it possible to ask this question on a scale and with prioritization? i.e. The Single Biggest Opportunity, Opportunity, Neither, Constraint, the Single Biggest Constraint (Ethan Guy – City of San Rafael)
 - Question is vaguely worded. Does it mean, does your city have adequate resources to meet the GP build out to 2030? (City of San Mateo)
 - Allow respondents to check both “opportunity” and “constraint” for the same category. (City of San Mateo)
 - I think this should be answered by scoring on a scale of 1-10. There are different levels of constraints or opportunities. If a city has 10 acres protected by federal program does this rise to the level of constraint? Too subjective. (Matt Walsh – Solano County)
- Notes on Question #5:
 - Could provide a list of items and an “other” category. Maybe it’s a prioritizing list ranking 1, 2, 3, etc. That would seem more helpful than just identifying topics like funding, etc. (Jeffery Baird - Baird + Driskell Community Planning)
 - Add a question after this: Rank the following obstacles (the single biggest obstacle, major obstacle, minor obstacle, not an obstacle, N/A). (Ethan Guy – City of San Rafael)

- I disagree with the underlying premise/presumption that existing public transportation infrastructure are adequate to support additional growth, in many cases these systems are inadequate to serve existing needs. (John Swiecki – City of Brisbane)
 - Replace growth with “jobs and housing”. (Mindy Gentry – City of Concord).
 - Replace “growth that maximizes the use of” with “more housing near” (Enterprise Community Partners)
- Notes on Question #6
 - This question is better directed at LAFCOs. (John Swiecki – City of Brisbane)
 - Can this be asked as a category question: Ex. Check all of the following Agreement that are in place in your jurisdiction (Ethan Guy – City of San Rafael)

Housing Affordability and Overcrowding (Questions 7-8)

- Both of these questions could clarify that they’re asking for local or other source of data. (Jeffery Baird - Baird + Driskell Community Planning)
- What income categories are these questions asking about? Does it matter if the households are above moderate income? (City of San Mateo)
- Notes on Question #7:
 - Unclear what value such localized anecdotal responses will provide when there is already research documenting these impacts. (John Swiecki – City of Brisbane)
 - “What impacts...have *on residents* in your jurisdiction?” (Enterprise Community Partners)
 - To ask an open ended question like this, you should also include a question that quantifies the respondents understanding of the metric: How familiar with housing cost burden/rent burden are you? Does your jurisdiction use statistics on rent burden to make policy decisions, etc.? (Ethan Guy – City of San Rafael)
 - To make sure they are correct, you should also ask them to enter the statistics on cost burden, so you can confirm they are basing their answers off the right number. (Ethan Guy – City of San Rafael)
- Notes on Question #8:
 - Having local staff try to guess at the national and regional economic and demographic conditions which will drive this issue does not seem particularly useful. (John Swiecki – City of Brisbane)
 - “What impacts...have *on residents* in your jurisdiction?” (Enterprise Community Partners)
 - Could this be rephrased to be a scaled question with this box as chance to explain? For instance, could this question be, How would you rate the rate of overcrowding in your jurisdiction? A follow up question could provide a list of impacts they could then rank/scale as having a high or low impact. (Ethan Guy – City of San Rafael)

Housing Demand (Questions 9-18)

- There are other groups in addition to farmworkers that might be worth pulling out separately, including jobs without a set place of employment (e.g., gardeners, nannys, gig workers, etc.). (Enterprise Community Partners)

- Income data by job category (ie, farmworkers or any other category) is available by County with median incomes and by MSAs down to income quartiles, from <https://www.labormarketinfo.edd.ca.gov/data/wages.html#QCEW>. The data is by individual workers, rather than households. (Fernando Marti, Council of Community Housing Organizations)
- Notes on Question #9:
 - Add “including needs that are currently met.” (Enterprise Community Partners)
 - Add an option to check if not applicable (Leslie Carmichael – City of Foster City).
 - Should be a rate question: How would you rate the total need for farmworker housing in your jurisdiction? (The single biggest need, major need, minor need, no need) If you want to ask as an open ended question, provide what units the respondent is supposed to answer in. Are these housing units? A sentence describing the need? Ideally, anytime you are asking for a unit, you provide a range for them to check instead. (Ethan Guy – City of San Rafael)
 - What is the time period for this question? (City of San Mateo)
- Notes on Question #10:
 - Two questions here: 1) question scaling if the jurisdiction is meeting the demand 2) Same as above, you need to provide the unit that the respondent should respond in. There also appears to be a missing question here: “Why are you not meeting the demand?” (Ethan Guy – City of San Rafael)
- Notes on Question #11:
 - Not sure how a jurisdiction can respond to this without knowing the need through 2030. Seems to me it may be better to identify what jurisdictions are doing now to address the need with a list of items and an “other” category. Maybe also a priority order of what’s most effective? (Jeffery Baird - Baird + Driskell Community Planning)
 - If you mark no, there should be a follow up question ask why do you expect not meeting the demand. (Ethan Guy – City of San Rafael)
- Notes on Question #12:
 - I am not aware of anyone preparing a “total housing needs” analysis of a Bay Area higher educational institution and thus not sure how someone would answer this question. Whatever it is, it should include undergraduate students, graduate students, commuter students, staff, and faculty, each of which have very different housing needs. (Jeff Bond - City of Albany)
 - Is this currently or future? Maybe first a question as to whether there’s a private university, State or UC campus in the jurisdiction is more appropriate. (Jeffery Baird - Baird + Driskell Community Planning)
 - Add an option to check if not applicable (Leslie Carmichael – City of Foster City)
 - What unit should responses be given in? (Ethan Guy – City of San Rafael)
- Notes on Questions #13
 - Two questions here: 1) question scaling if the jurisdiction is meeting the demand 2) You need to provide the unit that the respondent should respond in. There also appears to be a missing question here: Why are you not meeting the demand? (Ethan Guy – City of San Rafael)

- Notes on Question #14:
 - If you mark no, there should be a follow up question ask why do you expect not meeting the demand. (Ethan Guy – City of San Rafael)
- Notes on Question #15:
 - Specify that these are “at-risk units” (Mindy Gentry – City of Concord)
 - Specify that the emergency is “state-declared” (Mindy Gentry – City of Concord)
 - Add a question “ Does your jurisdiction *anticipate* a loss of units in assisted housing developments in the next 10 years? If yes please explain. (Leslie Carmichael – City of Foster City)
- Notes on Question #16:
 - Should be three questions. 1) how many units 2) why (and have them choose from list of potential reasons) 3) explain (Ethan Guy – City of San Rafael)
- Notes on Question #17:
 - Provide a date (City of San Mateo)
- Notes on Question #18:
 - Add questions after Question 18 asking whether jurisdiction anticipates some units not being replaced and why (Mindy Gentry – City of Concord)
 - If possible, it would be useful to ask about the affordability level and tenure (rent v own) of the units that were lost. (Enterprise Community Partners)
 - Should be three questions. 1) how many units 2) why (and have them choose from list of potential reasons) 3) explain (Ethan Guy – City of San Rafael)

Fair Housing Planning and Data Sources (Questions 19-23)

- Notes on Question #19:
 - No context is provided for this question. It seems to be a requirement applicable to HUD grantees only. (John Swiecki – City of Brisbane)
 - County of Santa Clara and most cities in Santa Clara County are currently working together on the CDBG Consolidated Plan and Assessment of Fair Housing document, to be completed in Spring 2020. It might be helpful to add a line to provide information current/upcoming efforts to capture this. (Kerri Heusler – City of Cupertino)
- Notes on Question #20:
 - Can this be a checklist with and other (please explain) option? Like question 21. (Ethan Guy – City of San Rafael, Jeffery Baird - Baird + Driskell Community Planning)
 - Would be helpful to understand what ABAG considers as legitimate data sources. (John Swiecki – City of Brisbane)
 - What kinds of issues? What sources? Maybe provide examples of the data sources or issues that are in mind. (Matt Walsh – Solano County)
- Notes on Question #21:
 - Add “Online survey or website forum” (Leslie Carmichael – City of Foster City)
- Notes on Question #22:
 - Asking for level of success without giving them a specific way to measure success doesn’t seem all that useful. Maybe ask about specific goals they set for

engagement and if they met those goals, unless ABAG has specific goals already outlined somewhere? (Enterprise Community Partners)

- Success in the engagement itself? Changing attitudes? Helping stop racial discrimination? (City of San Mateo)

Diversity and Segregation (Questions 24-25)

- There is a lot of overlap on Questions 24, 26, and 28, and for good reason. Perhaps it could be one question with the most inclusive list of options and then check-boxes for 1) segregation, 2) access to opportunity, and 3) housing needs, followed by space to describe. The descriptions currently part of the wording of Q24, 26, and 28 could still be included before the matrix of choices. This might make it easier for respondents and ensure that all of the choices are included in each section, while not being redundant. (Enterprise Community Partners)
- It would be beneficial to include/link to data on segregation, disparities in access to opportunity, and housing needs in the jurisdiction and regionwide, similar to what we suggest for Q1. If this is included, the survey could then ask respondents to note how their jurisdiction compares to the region wide averages. This will help cue the respondent up to think about why they may or may not do well, relatively, and it should make analysis easier too! (Enterprise Community Partners)
- Not sure the agency can answer some of this. Rents, foreclosures, abandoned sites, realtor practices, lending practices, are not typically issues that the county tracks. These questions are better suited to private sector. (Matt Walsh – Solano County)
- Suggestion by Leslie Carmichael (City of Foster City) to add the following questions before #24:
 - Please see [resource] on disparities in housing patterns or racially/ethnically concentrated areas of poverty in your jurisdiction.
 - Does your jurisdiction have disparities within your jurisdiction in housing patterns or racially/ethnically concentrated areas of poverty?
- Notes on Question #24:
 - Can this question be asked so that the respondent rates them as well: The single biggest contributor, major contributor, minor contributor, does not contribute, N/A. (Ethan Guy – City of San Rafael, Jeffery Baird - Baird + Driskell Community Planning)
 - Incredibly unrealistic to expect local jurisdictions to have to the resources and expertise to meaningfully opine on many of these practices. (John Swiecki – City of Brisbane)
 - “Lack of private/public investments in *low-income neighborhoods (of color?)...*”; instead of “in specific neighborhoods” (Enterprise Community Partners)
 - Add “investment in transit”. Also add this to Questions 26 and 28 if keeping them separate. (Enterprise Community Partners)
 - Change column on right side of table to be split into two columns the have check boxes: “Factors that contribute to segregated housing patterns or racially/ethnically concentrated areas of poverty in your jurisdiction” and “Factors that prevent access to housing in your jurisdiction” (Leslie Carmichael – City of Foster City)

- Confusing questions. Assumes that if no segregation, then no ethnic diversity. (City of San Mateo)
 - Add "lack of public funding" and "History of ethnic migration" (City of San Mateo)
- Notes on Question #25: Can this question be set up like question 24 and list all factors and have the respondent choose: The single biggest priority, high priority, neither, low priority, the sign lowest priority (Ethan Guy – City of San Rafael)

Access to Opportunity (Questions 26-27)

- Suggestion by Leslie Carmichael (City of Foster City) to add the following questions before #26:
 - Please see [resource] on disparities in access to proficient schools, employment opportunities, and/or healthy neighborhoods in your jurisdiction.
 - Does your jurisdiction have disparities within the jurisdiction in access to proficient schools, employment opportunities, and/or healthy neighborhoods?
- Notes on Question #26:
 - Add "including services or amenities" to "Lack of private investments in specific neighborhoods" (Anita Addison - La Clinica de la Raza)
 - Add "Creation of and maintenance of high quality jobs and/or range of job opportunities." (Mindy Gentry – City of Concord)
 - Change column on right side of table to be split into two columns the have check boxes: "Factors that contribute to disparities in access to proficient schools, employment opportunities, and/or healthy neighborhoods in your jurisdiction" and "Factors that prevent access to housing in your jurisdiction" (Leslie Carmichael – City of Foster City)
 - Should have option to check if unknown whether factor contributes. (Matt Walsh – Solano County)

Disproportionate Housing Needs (Questions 28-29)

- Notes on Question #28:
 - Add "including services or amenities" to "Lack of private investments in specific neighborhoods" (Anita Addison - La Clinica de la Raza)
 - Add "CEQA and land use entitlement process" (Mindy Gentry – City of Concord)
 - Add "The availability of affordable units in a range of sizes (*especially 3-4 bedrooms*)" (Enterprise Community Partners)
 - Add "Please see [resource] on disparities in rates of housing cost burden, overcrowding, or substandard housing in your jurisdiction." before this question (Leslie Carmichael – City of Foster City)
 - Add "Low-wage jobs" (City of San Mateo)

Fair Housing Goals and Actions (Questions 30-32)

- Notes on Question #30:
 - Provide a list of items and an "other" category. (Jeffery Baird - Baird + Driskell Community Planning)

- Can this question be combined with Question #31 where a list of actions is provided and then the respondent is asked to rate the success of each action? A few extra lines can be provided for write ins. (Ethan Guy – City of San Rafael)
- Notes on Question #31:
 - See note on Question #22. (Enterprise Community Partners, City of San Mateo)
- Notes on Question #32:
 - Add “Living Wage employment ordinances” (Anita Addison - La Clinica de la Raza)
 - Add “Promoting streamlined processing of ADUs” (Mindy Gentry – City of Concord)
 - It might be helpful to add a few more status options: Adopted/ In Use, Under Council Consideration, Intend to Adopt, Potential Community/Council Interest, No intention. It may also be worthwhile to ask a series of categorized questions (like question 24 and 25) about what impact the jurisdiction believes these policies will have to prevent or mitigate. (Ethan Guy – City of San Rafael)
 - Are these only programs cities control? What about services/programs provided by other entities? Or services Cities fund? (City of San Mateo)
 - Add the following: Fair Housing/Legal Services and Counseling, Acquisition/Subsidy of units with expiring rent restrictions, other local housing funds, incentives for production of ADU's, Acquisition of housing with rents below market, surplus land for housing (City of San Mateo)

Additional Comments (Questions 33-34)

- Notes on Question #33:
 - Ask jurisdictions for thoughts on what criteria/factors are most important to consider when establishing the methodology. (Jeff Bond - City of Albany)
 - Clarify whether RHNA factors will be limited to the results of this survey? (Matt Walsh – Solano County)