

MEMO

TO: HOUSING METHODOLOGY COMMITTEE
FROM: ABAG RHNA TEAM
DATE: REVISED OCTOBER 16, 2006
RE: **SUBREGIONAL ALLOCATIONS**

The 2006-2014 RHNA authorizes local jurisdictions to form RHNA subregions. One RHNA subregion has formed; consisting of the County of San Mateo and the twenty (20) cities located in the county. The subregion has designated the City/County Association of Governments (C/CAG) as the entity responsible for coordinating and implementing the subregional RHNA process.

ABAG will assign a share of the regional need to the San Mateo RHNA subregion “in a proportion consistent with the distribution of households” in *Projections 2007*.¹ This subregional share will likely be different than the cumulative shares that the members of the subregion would receive under ABAG’s RHNA allocation methodology.

ABAG will also delegate to C/CAG the responsibility for allocating the subregional share among members of the subregion. C/CAG must:

- articulate a draft methodology by December 31, 2006
- adopt a final methodology by February 28, 2007
- adopt an initial subregional allocation by June 30, 2007
- adopt a final subregional allocation by June 30, 2008.²

If C/CAG does not complete the allocation or does not complete one of the above steps, ABAG must allocate the subregional share among the members of the subregion.³

ABAG staff requests Committee feedback on the following at the October 19 meeting:

- If C/CAG has adopted a “default allocation,” ABAG allocates using the default allocation. A “default allocation” is the allocation which a member of the San Mateo RHNA subregion receives if it “opts out” of the subregion.
- If the subregion fails before ABAG has made any allocation, ABAG combines the subregional share with the rest of the regional need and allocates the total regional need to the entire region using ABAG’s RHNA methodology.
- If the subregion fails after ABAG has made its initial allocation, ABAG separately allocates the subregional share among only the members of the subregion. ABAG uses its RHNA methodology to do so.

This approach minimizes the extent of reallocations that could occur and preserves the integrity of the respective efforts of ABAG and C/CAG. On the other hand, there may be scenarios in which, if the subregion fails after ABAG has made its allocation, combining the subregional share with the total for the rest of the region and allocating using ABAG’s RHNA methodology may result in lower numbers for some jurisdictions.

¹ Section 65584.03(c)

² The regulatory due dates for each of these steps match ABAG’s. The delegation agreement between ABAG and C/CAG will create sufficient gaps between the ABAG due dates and the subregion’s dues dates to permit ABAG and the RHNA subregion to meet their statutory obligations.

³ Section 65584.03(d)