



Regional Housing Need Plan

San Francisco Bay Area
2015-2023*



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Appendix G: Signed and Certified ABAG Executive Board Resolution 07-13 Adopting RHNA Plan
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RHNA Methodology Technical Documentation Folder
• Final RHNA Methodology Model
• RHNA Methodology Technical Document
RHNA Plan for HCD Folder
• Final Regional Housing Need Plan for the San Francisco Bay Area: 2015-2023
• RHNA Transmittal Letter to HCD
• HCD Acceptance Letter

* This document was originally published with an incorrect Housing Element planning period of 2014–2022. The document has been revised to reflect the correct dates. A correction to page 28 has been made to reflect changes to Santa Rosa and Unincorporated Sonoma County RHNA targets.

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Introduction

State law recognizes the vital role local governments play in the supply and affordability of housing. Each local government in California is required to adopt a Housing Element as part of its General Plan that shows how the community plans to meet the existing and projected housing needs of people at all income levels.

The Regional Housing Need Allocation (RHNA) is the state-mandated process to identify the total number of housing units (by affordability level) that each jurisdiction must accommodate in its Housing Element. As part of this process, the California Department of Housing and Community Development (HCD) identifies the total housing need for the San Francisco Bay Area for an eight-year period (in this cycle, from 2015 to 2023). ABAG must then develop a methodology to distribute this need to local governments. Once a local government has received its final RHNA, it must revise its Housing Element to show how it plans to accommodate its portion of the region's housing need.

Senate Bill 375, “The California Sustainable Communities and Climate Protection Act of 2008,” established a new framework for the RHNA. SB 375 requires each of the state's 18 metropolitan areas, including the Bay Area, to develop a Sustainable Communities Strategy (SCS) with the goals of reducing greenhouse gas (GHG) emissions from cars and light trucks and accommodating all needed housing growth within the region. This law

seeks to ensure that future land uses (through RHNA and other plans) are coordinated with long-term transportation investments.

Plan Bay Area is the long-range integrated transportation and land-use/housing strategy through 2040 for the San Francisco Bay Area. On July 18, 2013, the Plan was jointly approved by the Association of Bay Area Governments (ABAG) Executive Board and by the Metropolitan Transportation Commission (MTC). Per SB 375, the RHNA is required to be consistent with the development pattern in Plan Bay Area.

Starting in January 2011, ABAG worked with stakeholders from throughout the Bay Area to develop the 2015–2023 RHNA. We received significant feedback throughout the process that helped shape the allocation methodology and resulting allocations. We are particularly grateful for the contributions of the members of the SCS Housing Methodology Committee (detailed on pages 2 to 3) who were instrumental in developing the RHNA methodology.

This document, *Regional Housing Need Plan for the San Francisco Bay Area: 2015–2023*, provides a detailed overview of the RHNA process. It describes the RHNA methodology and its relationship to the SCS and documents the steps in the RHNA process, including developing the allocation methodology, issuing draft allocations, responding to



revision requests and appeals from local jurisdictions, and issuing final allocations.

The RHNA was adopted by the ABAG Executive Board on July 18, 2013. The official document accepted by HCD is available at http://www.abag.ca.gov/planning/housingneeds/pdfs/2015-23_RHNA_Plan.pdf.

I. About the Regional Housing Need Allocation

Since 1980, the State of California has required each jurisdiction to plan for its share of the state’s housing need for people of all income levels.¹ The Regional Housing Need Allocation (RHNA) is the process by which each community is assigned its share of the housing need for an eight-year period. This allocation consists of two steps. First, The California Department of Housing and Community Development (HCD) determines the total housing need for each region in the state. Second, as the Council of Governments for the San Francisco Bay Area, it is the responsibility of the Association of Bay Area Governments (ABAG) to distribute this need to local governments.

The RHNA identifies each jurisdiction’s responsibility for planning for housing, and is divided into four income categories

Once it receives its RHNA each local government must update the Housing Element of its General Plan to show how it plans to meet the housing needs in its community.

that encompass all levels of housing affordability. Once it receives its RHNA, each local government must update the Housing Element of its General Plan to show how it plans to meet the housing needs in its community.

For Bay Area local jurisdictions’ Housing Elements, this RHNA covers the planning period from January 31, 2015 to January 31, 2023, and Housing Element updates are required to be completed, with a finding of compliance by HCD, by January 31, 2015.

The Regional Housing Need Determination

In consultation with ABAG, HCD determined that the Bay Area must plan for 187,990 new housing units from 2015–2023 (Appendix A). This determination is based on population projections

produced by the California Department of Finance (DOF), which also took into account the uncertainty regarding the economy and regional housing markets. For this cycle, HCD made an adjustment to account for abnormally high vacancies and unique market conditions due to prolonged recessionary conditions, high unemployment, and unprecedented foreclosures. As a result, the Regional Housing Need Determination (RHND) from HCD for this RHNA cycle is lower than the RHND for 2007–2014. The RHND for the region, by income, is as follows:

2015 - 2023 RHNA by Income	Percent	Units (Rounded)
Very Low Up to 50 Percent of Area Median Income ²	24.8%	46,680
Low Between 51 and 80 Percent of Area Median Income	15.4%	28,940
Moderate Between 81 and 120 Percent of Area Median Income	17.8%	33,420
Above Moderate Above 120 Percent of Area Median Income	42.0%	78,950
	100.0%	187,990

II. The Relationship of the RHNA and the Sustainable Communities Strategy

As a result of the passage of Senate Bill 375 (Chapter, Statutes of 2008), the RHNA must be consistent with the development pattern included in the Sustainable Communities Strategy (SCS) of the Regional Transportation Plan (RTP). SB 375 requires that each region plan for future housing needs and complementary land uses, which in turn must be supported by a transportation investment strategy with a goal of reducing greenhouse gas (GHG) emissions from cars and light-duty trucks. ABAG and the Metropolitan Transportation Commission (MTC) have collaborated to develop Plan Bay Area to meet the requirements of SB 375.⁹

In the Bay Area, the SCS and the RHNA methodology are mutually reinforcing and were developed together to meet the overlapping objectives of SB 375 and Housing Element Law. These objectives include increasing the supply, diversity and affordability of housing; promoting infill development and a more efficient land use pattern; promoting an improved intraregional relationship between jobs and housing; protecting environmental resources; and promoting socioeconomic equity.

The Bay Area's sustainable growth framework is built around the Priority Development Areas (PDAs) and Priority Conservation Areas (PCAs). Priority Development Areas (PDAs) are existing neighborhoods near transit nominated by local jurisdictions as appropriate places to concentrate future growth. There are nearly 200 adopted PDAs (including subareas) in more than 70 of the 109 jurisdictions in the region. The PDAs represent

California Senate Bill 375: Linking Regional Plans to State Greenhouse Gas Reduction Goals

Plan Bay Area grew out of “The California Sustainable Communities and Climate Protection Act of 2008” (California Senate Bill 375, Steinberg), which requires each of the state’s 18 metropolitan areas – including the Bay Area – to reduce greenhouse gas emissions from cars and light trucks. Signed by former Gov. Arnold Schwarzenegger, the law requires that the Sustainable Communities Strategy (SCS) promote compact, mixed-use commercial and residential development. To meet the goals of SB 375, Plan Bay Area directs more future development in areas that are or will be walkable and bikable and close to public transit, jobs, schools, shopping, parks, recreation and other amenities.

Key elements of SB 375 include the following.

- The law requires that the Bay Area and other California regions develop a Sustainable Communities Strategy (SCS) – a new element of the regional transportation plan (RTP) – to strive to reach the greenhouse gas (GHG) reduction target established for each region by the California Air Resources Board. The Bay Area’s target is a 7 percent per capita reduction by 2020 and a 15 percent per capita reduction by 2035. Plan Bay Area is the region’s first RTP subject to SB 375.
- In the Bay Area, the Association of Bay Area Governments (ABAG) is responsible for the land use and housing assumptions for the SCS, which adds three new elements to the RTP: 1) a land use component that identifies how the region could house the region’s entire population over the next 25 years; 2) a discussion of resource and farmland areas and 3) a demonstration of how the development pattern and the transportation network can work together to reduce GHG emissions.
- Extensive outreach with local government officials is required, as well as a public participation plan that includes a minimum number of workshops in each county as well as three public hearings on the draft SCS prior to adoption of a final plan.
- The law synchronizes the regional housing need allocation (RHNA) process – adopted in the 1980s – with the regional transportation planning process.
- Finally, SB 375 streamlines the California Environmental Quality Act (CEQA) for housing and mixed-use projects that are consistent with the SCS and meet specified criteria, such as proximity to public transportation.

excerpted from Draft Plan Bay Area, Page 2

many types of places, from regional centers to neighborhood commercial nodes. They exist in all kinds of communities, from high-income suburban areas to city cores in need of reinvestment.

Priority Conservation Areas (PCAs) comprise over 100 regionally significant open spaces for which there exists broad consensus for longterm protection, but which face nearer-term development

pressures. They ensure that Plan Bay Area considers farmland and resource areas in keeping with SB 375. The PCAs and PDAs complement one another: promoting compact development within PDAs relieves some of the development pressure on the region's open space and agricultural lands.

Addressing these different mandates requires achieving a balance between the more focused growth pattern necessary to achieve GHG emission reductions and the need to ensure that every jurisdiction contributes its "fair share" toward meeting the region's housing need. RHNA must also achieve a balance between directing affordable housing to locations where it is needed by existing residents, including rural and suburban areas, and avoiding the over-concentration of poverty. The SCS and the RHNA methodology (both described in more detail below) work in concert to direct housing growth to PDAs and non-PDA locations throughout the region in order to balance these goals and mandates in a way that promotes inclusive housing patterns throughout the region.

Beyond the requirements specified in Housing Element Law and SB 375, the comprehensive Plan Bay Area effort will support RHNA through targeted transportation investments funded under the One Bay Area Grant (OBAG).⁴ The funding criteria for OBAG take into account local jurisdictions' past housing production and the 2015–2023 RHNA, for both total units and affordable units. The OBAG program also emphasizes the importance of planning for housing by requiring that

a jurisdiction has a Housing Element certified by HCD to be eligible for funding.

Although each PDA has a unique set of attributes and challenges, the goal of the SCS is that all will become complete communities that increase housing and transportation choices. The plan envisions these areas as neighborhoods where transit, jobs, schools, services, and recreation are conveniently located near people's homes. The OBAG program provides targeted investments to PDAs to help them achieve the goal of being a complete community. Making investments in neighborhoods that need them will benefit the residents living in these communities and help create more neighborhoods of opportunity throughout the region.

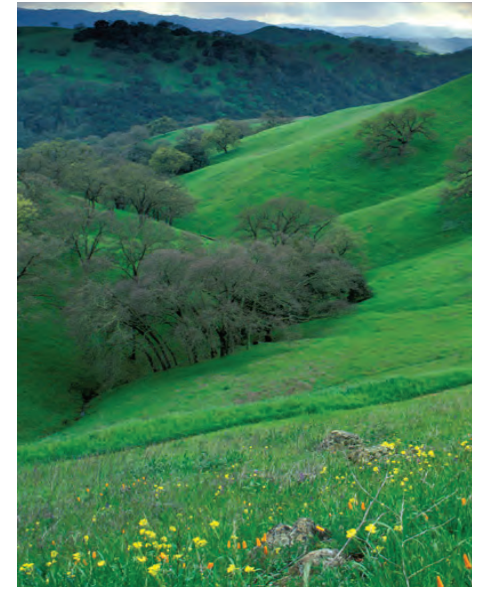
In addition, it is our expectation that tying the allocation of regional transportation dollars to housing and affordable housing production goals will result in the construction of more housing to meet the region's housing need compared to previous RHNA cycles. The creation of a PDA program with funding incentives tied to housing provides a mechanism through which the region can reward those jurisdic-

tions that are planning for and producing housing. Many jurisdictions that previously did not plan for new housing have established PDAs, undergone specific planning processes, and created new zones for residential development.

The SCS land use distribution is an initial input into the RHNA methodology.⁵ For the period between 2015 and 2023, the SCS accommodates RHNA by allocating the pre-determined regional housing need from HCD to local jurisdictions consistent with the land use criteria specified in the SCS. The SCS uses the RHNA as the housing growth pattern for the period between 2015 and 2023. Through this process, the region's housing, transportation, and land use planning are aligned.



Priority Development Area, Mountain View



Priority Conservation Area

III. The SCS Housing Distribution

Although the PDAs are a significant component of the growth pattern in the SCS, the housing distribution incorporates multiple factors to assign growth to PDAs and non-PDA areas. The ABAG Executive Board adopted a policy in July 2011 to support equitable and sustainable development by “maximizing the regional transit network and reducing GHG emissions by providing convenient access to employment for people of all incomes.” This is accomplished by distributing total housing growth numbers to: 1) job-rich cities that have PDAs or additional areas that are PDA-like; 2) areas connected to the existing transit infrastructure; and 3) areas that lack sufficient affordable housing to accommodate low-income commuters.⁶

The housing distribution in the SCS starts with local jurisdictions’ plans for growth and then makes adjustments based on factors related to sustainability, equity, and the economy. Housing growth is directed to areas throughout the region (including PDAs and non-PDA areas) with high levels of transit service, low vehicle miles traveled (which is highly correlated with GHG emissions), high employment in 2040, a high number of low-income workers commuting from other places, and high housing values. These factors aim to expand housing and transportation options; increase access to jobs, particularly for low-income workers; and promote housing growth in places with high-quality services, such as parks and schools. To meet the Bay Area’s adopted performance targets for the SCS, additional housing is directed to key

job centers and locations along the core transit network, including PDAs and non-PDA areas.⁷

Finally, the housing distribution in the SCS was adjusted to ensure a fair share distribution between large cities and medium cities with high job growth and transit access. Analysis of the concentrated growth pattern in the SCS indicated that some core cities require investments in transit infrastructure and utilities and improvements in public services before they can accommodate a high level of housing production. In recognition of these challenges, along with the expected pace of recovery from the current housing and fiscal crisis, ABAG shifted a small portion of housing growth in Oakland, San Jose, Newark, and the North Bay to a later period in the SCS plan horizon. The growth in these locations is expected

to occur after 2022, so ABAG shifted 3,500 housing units (1.5 percent of the regional total) from these locations to the balance of the region during the RHNA period. These adjustments do not change the 2010–2040 long-term growth totals in the SCS.



Suisun City Amtrak Station

IV. The Regional Housing Need Allocation Methodology

The RHNA methodology consists of two major steps: determining a jurisdiction’s total RHNA and identifying the share of the jurisdiction’s total RHNA in each income category. The following describes the components of the adopted RHNA Methodology.⁸

Determining a Jurisdiction’s Total RHNA

Sustainability Component

The Sustainability Component advances the goals of SB 375 and expands upon the inclusion of compact growth principles that began with the 2007–2014 RHNA methodology. Following the land use distribution specified in the SCS which allocates new housing into PDAs and non-PDA areas, 70 percent of the region’s housing need (as determined by HCD) is allocated based on growth in PDAs and the remaining 30 percent is allocated based on growth in non-PDA locations.

Using the PDA framework from the SCS in the RHNA methodology promotes growth in sustainable locations and is a key to ensuring consistency between the two planning documents. Directing growth to infill locations is a key component of protecting agricultural and natural resources. This

methodology also recognizes the multiple benefits for local communities and the region as a whole of encouraging housing, particularly affordable housing, in the neighborhoods near transit that local communities have identified as priorities for development and investment to create complete communities.

ABAG received some comments regarding concerns about the potential that the RHNA methodology would increase concentrations of poverty, perpetuate patterns of segregation, and limit housing opportunities for low-income households. ABAG’s responses to these concerns are available at <http://www.abag.ca.gov/planning/housingneeds/resources-new.html>.

Fair Share Component

It is important that jurisdictions with PDAs are not asked to shoulder too much of the responsibility for meeting the region’s housing need. PDAs are not the only areas in which housing

choices are needed, and the RHNA methodology must ensure that all jurisdictions share responsibility for meeting the regional need for housing. Focusing only on PDAs could mean that jurisdictions that were unable or unwilling to designate any PDAs would not be allocated their “fair share” of the regional housing obligation.

As noted above, the housing distribution in the SCS directs housing growth to non-PDA locations in the region based on factors that aim to expand housing and transportation options; increase access to jobs, particularly for low-income workers; and promote housing growth in places with high-quality services, such as parks and schools.

The RHNA methodology builds upon this distribution with the inclusion of an explicit “fair share” component that achieves the requirement that all cities and counties in California work to provide a fair share proportion of the region’s total housing need for households at all income levels. The Fair Share Component allocates housing need to expand access to communities with good transit access and employment opportunities.

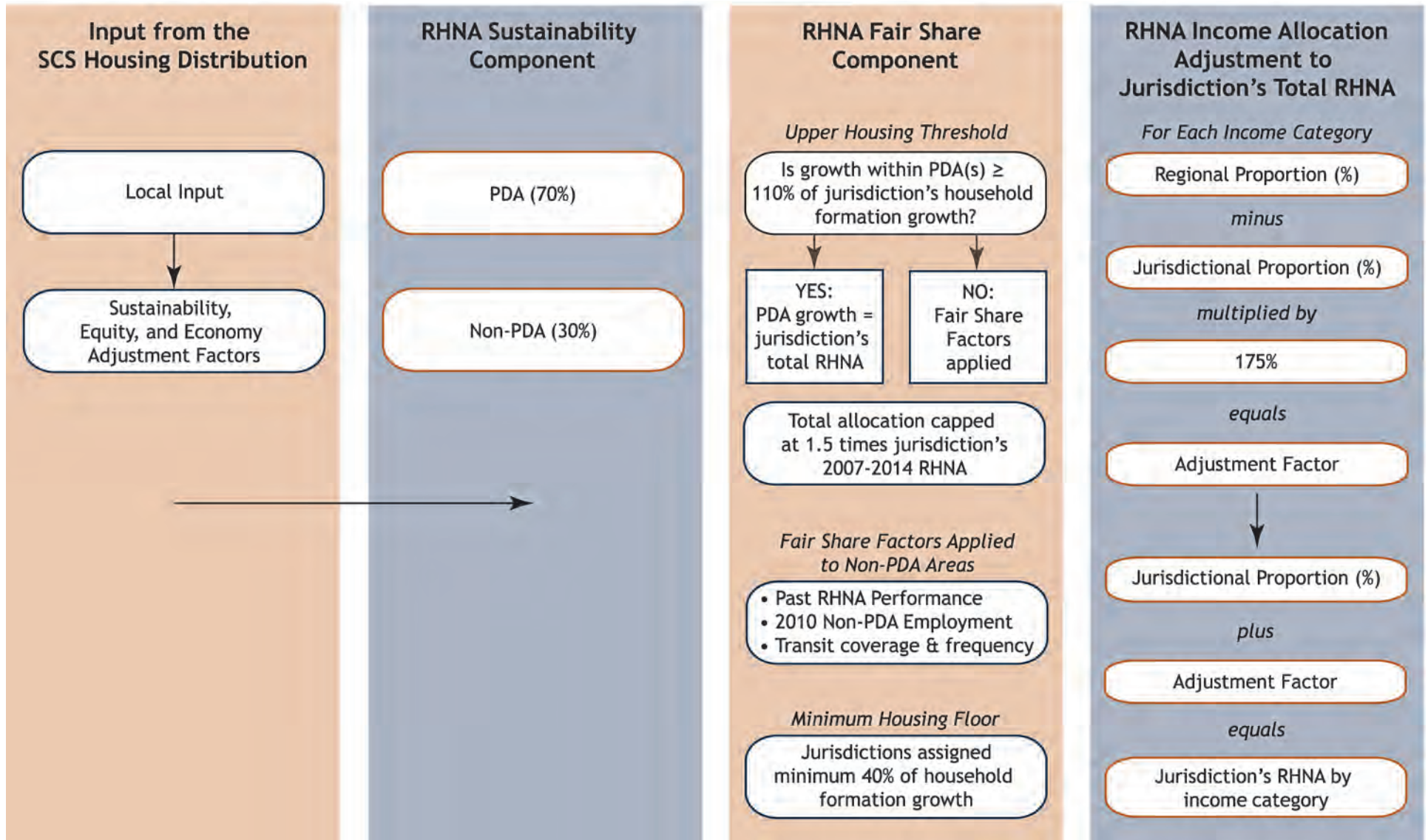
The Fair Share Component includes the factors listed below:

Upper Housing Threshold: If the SCS projects growth in a jurisdiction’s PDAs that meets or exceeds 110 percent of the jurisdiction’s expected household formation growth (described in more detail in Appendix B), that jurisdiction is not assigned additional units. This ensures that cities with large PDAs are not overburdened. Also, the total allocation to a jurisdiction cannot exceed 150 percent of its 2007–2014 RHNA.

Fair Share Factors: The following three factors were applied to a jurisdiction’s non-PDA growth:

- Past RHNA Performance: Cities that permitted a high number of housing units for very

Overview of the SCS-RHNA Methodology



low- and low-income households during the 1999–2006 RHNA cycle receive a lower allocation.

- 2010 Employment: Jurisdictions with a higher number of existing jobs in non-PDA areas (based on 2010 data) receive a higher allocation.
- Transit: Jurisdictions with higher transit frequency and coverage receive a higher allocation.

Minimum Housing Floor: Jurisdictions are assigned a minimum of 40 percent of their household formation growth. Setting this minimum threshold ensures that each jurisdiction is planning for housing to accommodate at least a portion of the housing need generated by the population within that jurisdiction.

Sphere of Influence Adjustments

Spheres of Influence (SOI) must be considered in the RHNA methodology if there is projected growth within a city's SOI. Most SOI in the Bay Area are anticipated to experience growth. Every city in the Bay Area has a SOI which can be either contiguous with or go beyond the city's boundary. The SOI is considered the probable future boundary of a city and that city is responsible for planning within its SOI.

The SOI boundary is designated by the county's Local Area Formation Commission (LAFCO). The LAFCO influences how government responsibilities are divided among jurisdictions and service districts in these areas.

The method for allocating housing need for jurisdictions where there is projected growth within the SOI varies by county. In Napa, San Mateo, Santa Clara, Solano, and Sonoma counties, the allocation of housing need generated by the unincorporated SOI is assigned to the cities. In Alameda and Contra Costa counties, the allocation of housing need generated by the unincorporated SOI is assigned to the county. In Marin County, 62.5 percent of the allocation of housing need generated by the unincorporated SOI is assigned to the city and 37.5 percent is assigned to the county.

These rules are based on the premise that each local jurisdiction with land use permitting authority over its SOI should plan for the housing need generated within that area. These rules reflect the fact that each county in the Bay Area is different in terms of whether a city or county has jurisdiction over land use and development within unincorporated SOIs.

Allocating Units by Income Category

Two primary objectives of the state's regional housing need process are to increase the supply of housing and to ensure that local governments consider the housing needs of households at all

income levels. In addition to identifying each jurisdiction's share of the region's total housing need, the RHNA methodology must also divide this allocation into the four income categories defined by HCD.⁹ The income allocation portion of the RHNA method is designed to ensure that



Novato

each jurisdiction in the Bay Area plans for housing for households of every income. The final RHNA methodology uses the same method for distributing units by income as the 2007–2014 RHNA.

The income allocation method gives a jurisdiction that has a relatively higher proportion of households in a certain income category a smaller allocation of housing units in that same category. For example, jurisdictions that already supply a large amount of affordable housing receive lower affordable housing allocations. This promotes the state objective for reducing concentrations of poverty and increasing the mix of housing types among cities and counties equitably.

The income distribution of a jurisdiction’s housing need allocation is determined by the difference between the regional proportion of households in an income category and the jurisdiction’s proportion for that same category, based on data from the US Census 2005–2009 American Community Survey. Once determined, this difference is then multiplied by 175 percent. The result becomes that jurisdiction’s “adjustment factor.” The jurisdiction’s adjustment factor is added to the jurisdiction’s initial proportion of households in that income category. The result is the total share of the jurisdiction’s housing unit allocation for that income category.

For example, if a jurisdiction has 38 percent of its households in the very low income category, this would be compared to the regional percentage in

Jurisdiction	Jurisdiction Proportion	Regional Proportion	Difference	Multiplier	Adjustment Factor	Total Share
Bay Area City	38	38	-13	175%	-23	15

this income category, which is 25 percent. The difference between 25 and 38 - 13. This is multiplied by 175 percent (the adjustment factor) for a result of -23. This number is then added to the jurisdiction’s original distribution of 38 percent, for a total share of about 15 percent. Therefore, 15 percent of their allocation must be affordable to households with very low income.

Pages 21 to 28 show the final RHNA, by income category, for every jurisdiction in the Bay Area.



Downtown Petaluma

V. Regional Housing Need Allocation Objectives and Factors

RHNA Objectives

State housing element law mandates that the RHNA be consistent with four primary objectives.¹⁰ These objectives, and the ways in which the Bay Area's RHNA meets them, are described below:

1. Increasing the housing supply and the mix of housing types, tenure, and affordability in all cities and counties within the region in an equitable manner, which shall result in all jurisdictions receiving an allocation of units for low- and very low-income households.

The RHNA allocates the total regional housing need, as determined by HCD, and every jurisdiction in the Bay Area is allocated a share of the need across all income categories. The income allocation methodology promotes a more equitable income distribution throughout the region by assigning a higher proportion of affordable units to jurisdictions that currently have a low number of very low- and low-income households.

2. Promoting infill development and socio-economic equity, the protection of environmental and agricultural resources, and the encouragement of efficient development patterns.

The Bay Area's sustainable growth framework for the SCS forecast and RHNA methodology is built around Priority Development Areas (PDAs) and Priority Conservation Areas (PCAs). By incorporating the PDAs, which are by definition infill locations near transit, the RHNA promotes infill development and a more efficient development pat-



Downtown Berkeley

tern. In the SCS forecast (which is the initial input into the RHNA), more housing growth is directed to PDAs and non-PDA areas with high levels of transit service, in order to maximize the use of public transportation and capitalize on the investments in transportation infrastructure that have already been made. Also, the Fair Share Component of the RHNA methodology includes a transit factor to assign higher allocations to jurisdictions with strong transit networks.

Promoting compact development within PDAs relieves development pressure on the region's open space and agricultural lands. The SCS forecast directs growth away from the region's adopted PCAs as well as farmland and resource lands. The urban growth boundaries and other policies for city-centered growth enacted by local jurisdictions are also used to constrain growth. As a result, all of the region's future growth in the SCS and RHNA is forecast to occur within the existing urban footprint. The RHNA methodology also includes Sphere of Influence adjustments that respect local agreements about directing growth in unincorporated areas by allocating units to the jurisdiction, whether city or county, that has authority over land use and development within the unincorporated Sphere of Influence.

The RHNA promotes socio-economic equity by expanding the range of housing choices available in all jurisdictions throughout the Bay Area. The fair share component of the RHNA methodology includes a Minimum Housing Floor that assigns jurisdictions a minimum of 40 percent of their expected household growth. Setting this minimum threshold ensures that each jurisdiction is planning for housing to accommodate at least a portion of the housing need generated by the population within that jurisdiction.

The RHNA also includes elements specifically intended to increase the range of housing options for low-income households. The emphasis on linking housing growth to transit has the potential

to provide households with increased access to jobs, services, and other amenities—particularly for low-income households that cannot afford car ownership. The SCS forecast also distributes more housing to jurisdictions that import a high number of low-income workers as a way to increase access to housing near jobs for these workers.

Jurisdictions with high median home values also received more housing growth to expand housing options in places with high-quality services, such as parks and schools. The RHNA methodology also allocates more housing to jurisdictions that permitted few affordable housing units during the 1999–2006 RHNA period. Finally, the income allocation methodology encourages more affordable housing in high-income areas by allocating a higher proportion of affordable housing units to jurisdictions that have fewer very-low and low-income households compared to other jurisdictions in the region.

3. Promoting an improved intraregional relationship between jobs and housing.

The employment distribution in the SCS considers job sectors, and links job growth to existing employment clusters and to the future housing distribution. The housing distribution in the SCS specifically shifts housing growth to locations forecasted to be job centers in 2040 and to places that are importing many low-income workers. The RHNA methodology builds on this framework with the employment factor in the Fair Share Component that links the housing allocation to the number of jobs in non-PDA locations.

4. Allocating 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, as compared to the countywide distribution of households in that category from the most recent decennial United States census.



Embarcadero, San Francisco

The income allocation method compares each jurisdiction’s household income distribution to the regionwide household distribution, based on data from the US Census 2005–2009 American Community Survey. A jurisdiction that has a relatively higher proportion of households in a certain income category receives a smaller allocation of housing units in that same category. For example, jurisdictions that already supply a large amount of affordable housing receive lower affordable housing allocations. This promotes the state objective for reducing concentrations of poverty and increasing the mix of housing types among cities and counties equitably.

Statutory Factors

In addition to meeting the objectives outlined above, State housing element law requires ABAG to consider a specific set of factors in the development of the RHNA methodology.¹¹ The law also requires ABAG to survey local jurisdictions for information about these factors. ABAG sent a survey to all jurisdictions in the region in January 2012, and received 40 responses.¹²

Many of these factors were incorporated in the development of the SCS forecast, which is an input into the RHNA methodology. The statutory factors to be considered and a discussion of how each is addressed in the Bay Area’s RHNA methodology are provided below:

1. Each member jurisdiction’s existing and projected jobs and housing relationship.

The SCS forecast is based on information from local governments about existing land uses as well as their plans for future growth. A detailed understanding of the locations of jobs and housing within each jurisdiction is the starting point for the distribution of future employment and housing growth in the SCS. The employment distribution in the SCS considers job sectors, and links job growth to existing employment clusters and to the future housing distribution. The housing distribution in the SCS specifically shifts housing growth to locations forecasted to be job centers in 2040 and to places that are importing many low-income workers. The RHNA methodology builds on this framework with the employment factor in

the Fair Share Component that links the housing allocation to the number of jobs in non-PDA locations.

2. The opportunities and constraints to development of additional housing in each member jurisdiction, including all of the following:

- a. Lack of capacity for sewer or water service due to federal or state laws, regulations or regulatory actions, or supply and distribution decisions made by a sewer or water service provider other than the local jurisdiction that preclude the jurisdiction from providing necessary infrastructure for additional development during the planning period.**
- b. The availability of land suitable for urban development or for conversion to residential use, the availability of underutilized land, and opportunities for infill development and increased residential densities. The council of governments may not limit its consideration of suitable housing sites or land suitable for urban development to existing zoning ordinances and land use restrictions of a locality, but shall consider the potential for increased residential development under alternative zoning ordinances and land use restrictions.**
- c. Lands preserved or protected from urban development under existing federal or state programs, or both, designed to protect open space, farmland, environmental**

habitats and natural resources on a long-term basis.

d. County policies to preserve prime agricultural land, as defined pursuant to Section 56064, within an unincorporated area.

Local jurisdictions consider infrastructure requirements, including water and sewer capacity, when developing their general plans and neighborhood plans. Local plans and information about existing land uses are used to inform the SCS forecast. However, this information is not used to limit a jurisdiction's housing allocation.

The forecast also evaluates each local jurisdiction's capacity for additional growth, considering opportunities to increase residential densities or convert land to residential uses. Recent trends show that multi-family housing is an increasing share of new homes—from 35 percent of total housing construction in the 1990s to nearly 50 percent in the 2000s, and 65 percent in 2010.¹³ The SCS forecasts accounts for a continuation of this trend into the future.

The SCS forecast directs growth away from the region's adopted Priority Conservation Areas (PCAs) as well as farmland and resource lands. The urban growth boundaries enacted by local jurisdictions are also used to constrain growth. As a result, all of the region's future growth in the SCS is forecast to occur within the existing urban footprint. The SCS forecast is an initial input into the RHNA methodology.

In the RHNA methodology, the Upper Housing Threshold ensures that jurisdictions with PDAs are not overburdened by being allocated too much responsibility for addressing the region's housing need. The Minimum Housing Floor ensures that every jurisdiction plans for a portion of its expected household formation growth and that the housing allocations are not limited by existing zoning.

3. The distribution of household growth assumed for purposes of a comparable period of regional transportation plans and opportunities to maximize the use of public transportation and existing transportation infrastructure.

The SCS is the land use element for the regional transportation plan, and the SCS forecast is an initial input into the RHNA methodology. In the SCS, more housing growth is directed to areas with high levels of transit service, in order to maximize the use of public transportation and capitalize on the investments in transportation infrastructure that have already been made.

The RHNA methodology also encourages transit use by directing growth to transit-served locations throughout the region. The Sustainability Component of the RHNA methodology distributes 70 percent of the region's total housing need based on growth assigned to the Bay Area's adopted PDAs which, by definition, are areas near transit. Also, the Fair Share Component of the RHNA methodology includes a transit factor to assign higher allocations to jurisdictions with strong transit networks.

4. The market demand for housing.

Local jurisdictions consider market demand when developing their general plans and neighborhood plans which are used to inform the SCS housing forecast. In addition, the SCS accounts for vacant units by reducing the new units assigned to an area based on the number of vacant units that need to be absorbed before additional housing growth is likely to occur.

The SCS also considers the market demand for housing with the inclusion of a housing value factor that directs additional housing to a jurisdiction based on its median home value in 2010. The median home value in an area is a proxy for the market demand for housing in that area.

5. Agreements between a county and cities in a county to direct growth toward incorporated areas of the county.

The urban growth boundaries and other policies for city-centered growth enacted by local jurisdictions are used to constrain growth in the SCS forecast. As a result, all of the region's future growth in the SCS is forecast to occur within the existing urban footprint. The SCS forecast is an initial input into the RHNA methodology.

In addition, the RHNA methodology includes a Sphere of Influence adjustment that applies different allocation rules to the different Bay Area counties. The rules respect the city and county agreements about directing growth in unincorporated areas by allocating units to the jurisdiction,

whether city or county, that has authority over land use and development within the unincorporated Sphere of Influence.

6. The loss of units contained in assisted housing developments, as defined in paragraph (9) of subdivision (a) of Section 65583, that changed to non-low-income use through mortgage prepayment, subsidy contract expirations, or termination of use restrictions.

Data about loss of assisted housing units was not readily available at the time the RHNA methodology was developed, and varies widely among local jurisdictions. Each jurisdiction will identify how best to address it when preparing its Housing Element. The One Bay Area Grant program incentivizes jurisdictions to have a Housing Element that is certified by HCD, since jurisdictions are not eligible to receiving transportation funding if this requirement is not met.

The RHNA income allocation gives jurisdictions with a relatively higher proportion of households in a certain income category a smaller allocation of housing units in that same category. Jurisdictions that have fewer low-income households (because of a loss of assisted housing units or other reasons) will have increased responsibility to provide affordable housing options.

7. High-housing cost burdens.

The RHNA income allocation gives jurisdictions that have a relatively higher proportion of households in a certain income category a smaller

allocation of housing units in that same category. Jurisdictions with particularly high housing costs, and a resulting small proportion of low-income households, will receive a higher allocation of affordable units to address the higher housing costs. The RHNA methodology also directs higher allocations to jurisdictions that exacerbated high housing cost burdens by permitting fewer affordable units during the 1999–2006 RHNA period.

8. The housing needs of farmworkers.

The fair share component of the RHNA methodology includes a Minimum Housing Floor that assigns jurisdictions a minimum of 40 percent of their expected household formation growth. This minimum threshold encourages all jurisdictions to produce a portion of the total housing need. This ensures that, although a significant portion of the RHNA is directed to transit-rich areas, less intensely developed areas with a need for farm worker housing will still produce new residential units.

In addition, farmworker housing needs are considered part of the housing needs for very low- and low-income households. The RHNA income allocation methodology gives jurisdictions that have a relatively higher proportion of households in a certain income category a smaller allocation of housing units in that same category.

9. The housing needs generated by the presence of a private university or a campus of the California State University or the University of California within any member jurisdiction.

The SCS employment forecast accounts for employment at universities, and their housing needs are accounted for in the SCS household forecast. The household estimates in the SCS forecast account for all people living in homes, including students. Students living in college dormitories (known as “group quarters”) are not included as part of the household population and are not considered as part of the RHNA process.

10. Other

The RHNA methodology includes a factor that directs lower allocations to jurisdictions that permitted more very low- and low-income units during the 1999–2006 RHNA period. This factor rewards jurisdictions that have succeeded in expanding the range of affordable housing options in their communities.



College Vista, Canada College, Redwood City; photo credit San Mateo County

VI. Schedule and Process for Developing RHNA

ABAG has sought to engage local jurisdictions, stakeholders, and members of the public throughout the process of developing the RHNA. In January 2011, ABAG convened the SCS Housing Methodology Committee (HMC), comprised of local elected officials, staff and stakeholders from throughout the region, to advise staff on developing the RHNA methodology. Between January 2011 and April 2012, the committee met almost every month to deliberate about how best to allocate the region's housing need to jurisdictions and to ensure consistency between RHNA and the SCS.¹⁴ Appendix D shows the members of the HMC as well as a list of other people who participated in the meetings. In addition, public participation was encouraged throughout the process of developing the RHNA, especially at public meetings and during official public comment periods following the release of discussion documents and board decisions.

Major Milestones in the RHNA Process

The major milestones of the RHNA process are outlined below:

- On February 24, 2012, HCD provided ABAG with its determination of total regional housing need. HCD indicated that Bay Area jurisdictions must plan for 187,990 units between 2015–2023.
- On May 17, 2012, the ABAG Executive Board¹⁵ approved the draft RHNA methodology and a draft share of the region's total

housing need for each of the subregions. Release of the draft methodology initiated a 60-day comment period, including a public hearing on June 6, 2012, for ABAG to receive comments about the draft methodology and subregional shares.¹⁶

- On July 19, 2012, the ABAG Executive Board adopted the final RHNA methodology and approved release of the draft allocations.
- Release of the draft allocations on July 20, 2012 initiated a 60-day period in which a local jurisdiction could request a revision to its RHNA. By the September 18, 2012 deadline, ABAG received revision requests from 14 jurisdictions.¹⁷ None of the revision requests were granted.
- Local jurisdictions that requested a revision had until February 18, 2013 to appeal ABAG's decision on their revision requests. Eight jurisdictions submitted appeals.¹⁸ The ABAG Executive Board formed an ad hoc Appeal Committee to hear the appeals and provide its recommended actions to the Executive Board. The Appeal Committee held a public hearing to hear the appeals on April 1, 2013. Appendix E includes a summary of the Appeal Committee's recommendations.
- On May 16, 2013, the ABAG Executive Board adopted the Appeal Committee's recommendations to support the appeals brought by

Hayward, Lafayette, and Sunnyvale and deny the other five appeals. The ABAG Executive Board also approved an agreement between the City of Palo Alto and the County of Santa Clara to transfer 200 moderate-income units from the City to the County. Appendix F includes the transfer agreement submitted by the City of Palo Alto and the County of Santa Clara.

- The Final RHNA numbers released on June 3, 2013 incorporate the changes resulting from the appeal process and transfer agreement that were adopted by the ABAG Executive Board.
- On July 18, 2013, the ABAG Executive Board adopted the Final RHNA. The Final RHNA adopted by the ABAG Executive Board included an adjustment to the allocation for the City of Sunnyvale that resulted from a rounding error in incorporating the changes resulting from the appeal process. For Sunnyvale, one unit was shifted from the moderate-income category to the above moderate-income category, with no change to the City's total RHNA. See Appendix G for the ABAG Executive Board adopting resolution.
- January 31, 2015 is the deadline for local jurisdictions in the Bay Area to have their revised Housing Elements approved by HCD.

VII. Subregions

As part of the RHNA process, local jurisdictions have the opportunity to form a subregion to conduct an allocation process that parallels, but is separate from, the regional process.¹⁹ For the 2015–2023 RHNA, three subregions were formed by the respective jurisdictions in Napa, San Mateo,²⁰ and Solano counties.

The first step in the subregions' RHNA process was for ABAG to determine each subregion's share of the total regional housing need determination from HCD. Housing Element law states that the subregion's share "shall be in a proportion consistent with the distribution of households assumed for the comparable time period of the applicable regional transportation plan."²¹ The household distribution is based upon the county's distribution in 2022 from the Jobs-Housing Connection Strategy of the SCS.²² Napa received 0.8 percent, San Mateo received 8.7 percent, and Solano received 3.7 percent of the region's total housing need.

ABAG used the income allocation methodology that is part of the region's allocation methodology to determine each subregion's allocation by income. Applying the 175 percent shift in determining the subregion's income distribution helps to overcome the existing income disparities among counties (and the jurisdictions in those counties) and move jurisdictions closer to the regional distribution. If a subregion's income allocation were based solely on its existing income distribution—

without applying the 175 percent shift—the region would be unable to effectively share responsibility with the subregions for providing affordable housing and avoiding over-concentration of these units.

Once it received its share of the region's total housing need by income, each subregion was then required to meet the same statutory requirements as the regional allocation process, and was responsible for completing each step in the allocation process. This included developing its own methodology, issuing draft allocations to member jurisdictions, conducting the revision and appeal processes, and issuing final allocations. Each subregion was also required to ensure that its final housing allocation is consistent with the Bay Area's Sustainable Communities Strategy. The final allocations for each of the three subregions are in Appendix H.



VIII. Endnotes

1. California Government Code §65580.
2. HCD sets income limits for each of these income categories for every county in California. More information is available at <http://www.hcd.ca.gov/hpd/hrc/rep/state/incNote.html>.
3. More information about Plan Bay Area is available at <http://www.onebayarea.org/regional-initiatives/plan-bayarea.html>.
4. Details about OBAG are available at <http://www.onebayarea.org/funding-and-grants.html>.
5. The Jobs-Housing Connection Strategy (JHCS), adopted on May 16, 2012, was used as the SCS input into the RHNA. The Final SCS uses the same housing distribution methodology, which is described in more detail in the Forecast of Jobs, Population, and Housing (July 2013) at <http://www.onebayarea.org/regional-initiatives/plan-bay-area/draft-plan-bay-area/supplementary-reports.html>.
6. ABAG Executive Board Meeting Summary Minutes, No. 381, p. 9. July 21, 2011. <http://www.abag.ca.gov/abag/events/agendas/e091511a-Item%2006.A..pdf>
7. This affected the following cities: Millbrae, Oakland, Pleasanton, Redwood City, San Francisco, San Jose, San Mateo, San Ramon, Santa Clara, South San Francisco, Sunnyvale, and Walnut Creek. *Forecast of Jobs, Population, and Housing*, July 2013, p. 37.
8. A detailed explanation of how each jurisdiction's allocation was derived is available at <http://www.abag.ca.gov/planning/housingneeds/resources-new.html>.
9. Very low income is 50 percent or less of area median income (AMI), low income is 51 to 80 percent of AMI, moderate income is 81 to 120 percent of AMI, and above moderate is more than 120 percent of AMI.
10. California Government Code §65584(d).
11. California Government Code §65584.04(d).
12. The survey and responses received are available at <http://www.abag.ca.gov/planning/housingneeds/resources-new.html>.
13. Draft Plan Bay Area, page 38. (This information will be included in the Final Plan Bay Area. The final document for Plan Bay Area is expected to be available in Fall 2013. Visit <http://www.onebayarea.org/> for more information.)
14. Materials from the meetings of the SCS Housing Methodology Committee are available at <http://www.abag.ca.gov/planning/housingneeds/housing-methodology-committee.html>.
15. For a full list of meetings at which the ABAG Executive Board received information or took actions related to RHNA, see <http://www.abag.ca.gov/planning/housingneeds/executive-board.html>.
16. Comments about the draft methodology submitted to ABAG are available at <http://www.abag.ca.gov/planning/housingneeds/resources-new.html>. ABAG received no comments about the draft subregional shares.
17. The revision requests submitted to ABAG are available at <http://www.abag.ca.gov/planning/housingneeds/resources-new.html>.
18. The appeals submitted to ABAG are available at <http://www.abag.ca.gov/planning/housingneeds/resources-new.html>.
19. California Government Code §65584.02.
20. This is the second RHNA cycle for which the jurisdictions in San Mateo County have formed a subregion. The forum that was established for conducting the 2007–2014 RHNA process has proven to be a successful way for jurisdictions to collaborate throughout the Housing Element development and approval process. For more details, visit <http://www.21elements.com/>.
21. California Government Code §65584.03(c).
22. As a matter of statutory interpretation, ABAG has discretion in selecting the point in time at which it measures the proportionality of each subregion's households to the region's households.

IX. Final Regional Housing Need Allocation, 2015-2023 Adopted by the ABAG Executive Board on July 18, 2013

San Francisco Bay Area

	Very Low	Low	Moderate	Above Moderate	Total
SF Bay Area Total	46,680	28,940	33,420	78,950	187,990

Alameda County

	Very Low	Low	Moderate	Above Moderate	Total
Alameda	444	248	283	748	1,723
Albany	80	53	57	145	335
Berkeley	532	442	584	1,401	2,959
Dublin	796	446	425	618	2,285
Emeryville	276	211	259	752	1,498
Fremont	1,714	926	978	1,837	5,455
Hayward	851	480	608	1,981	3,920
Livermore	839	474	496	920	2,729
Newark	330	167	158	423	1,078
Oakland	2,059	2,075	2,815	7,816	14,765
Piedmont	24	14	15	7	60
Pleasanton	716	391	407	553	2,067
San Leandro	504	270	352	1,161	2,287
Union City	317	180	192	417	1,106
Unincorporated	430	227	295	817	1,769
Alameda Total	9,912	6,604	7,924	19,596	44,036

The California Department of Housing and Community Development sets income limits for each of the four RHNA income categories for every county in California. The income categories are defined relative to each county's Area Median Income (AMI). Very Low Income units are affordable to households with income up to 50% of AMI, Low Income units are affordable to households with income between 51 and 80% of AMI, Moderate Income units are affordable to households with income between 81 and 120% of AMI and Above Moderate units are affordable to households with income above 120% of AMI. More information is available at www.hcd.ca.gov/hpd/hrc/rep/state/incNote.html.

Contra Costa County

	Very Low	Low	Moderate	Above Moderate	Total
Antioch	349	205	214	680	1,448
Brentwood	234	124	123	279	760
Clayton	51	25	31	34	141
Concord	798	444	559	1,677	3,478
Danville	196	111	124	126	557
El Cerrito	100	63	69	166	398
Hercules	220	118	100	244	682
Lafayette	138	78	85	99	400
Martinez	124	72	78	195	469
Moraga	75	44	50	60	229
Oakley	317	174	175	502	1,168
Orinda	84	47	54	42	227
Pinole	80	48	43	126	297
Pittsburg	392	254	316	1,063	2,025
Pleasant Hill	118	69	84	177	448
Richmond	438	305	410	1,282	2,435
San Pablo	56	53	75	265	449
San Ramon	516	279	282	340	1,417
Walnut Creek	604	355	381	895	2,235
Unincorporated	374	218	243	532	1,367
Contra Costa Total	5,264	3,086	3,496	8,784	20,630

Marin County

	Very Low	Low	Moderate	Above Moderate	Total
Belvedere	4	3	4	5	16
Corte Madera	22	13	13	24	72
Fairfax	16	11	11	23	61
Larkspur	40	20	21	51	132
Mill Valley	41	24	26	38	129
Novato	111	65	72	167	415
Ross	6	4	4	4	18
San Anselmo	33	17	19	37	106
San Rafael	240	148	181	438	1,007
Sausalito	26	14	16	23	79
Tiburon	24	16	19	19	78
Unincorporated	55	32	37	61	185
Marin Total	618	367	423	890	2,298

Napa County*

	Very Low	Low	Moderate	Above Moderate	Total
American Canyon	116	54	58	164	392
Calistoga	6	2	4	15	27
Napa	185	106	141	403	835
St. Helena	8	5	5	13	31
Yountville	4	2	3	8	17
Unincorporated	51	30	32	67	180
Napa Total	370	199	243	670	1,482

* The jurisdictions in Napa, San Mateo, and Solano counties each chose to form a subregion to carry out the RHNA process. These numbers reflect the final allocations adopted by each of the three subregions.

San Francisco County

	Very Low	Low	Moderate	Above Moderate	Total
San Francisco	6,234	4,639	5,460	12,536	28,869
San Francisco Total	6,234	4,639	5,460	12,536	28,869

San Mateo County*

	Very Low	Low	Moderate	Above Moderate	Total
Atherton	35	26	29	3	93
Belmont	116	63	67	222	468
Brisbane	25	13	15	30	83
Burlingame	276	144	155	288	863
Colma	20	8	9	22	59
Daly City	400	188	221	541	1,350
East Palo Alto	64	54	83	266	467
Foster City	148	87	76	119	430
Half Moon Bay	52	31	36	121	240
Hillsborough	32	17	21	21	91
Menlo Park	233	129	143	150	655
Millbrae	193	101	112	257	663
Pacifica	121	68	70	154	413
Portola Valley	21	15	15	13	64
Redwood City	706	429	502	1,152	2,789
San Bruno	358	161	205	431	1,155
San Carlos	195	107	111	183	596
San Mateo	859	469	530	1,242	3,100
South San Francisco	565	281	313	705	1,864
Woodside	23	13	15	11	62
Unincorporated	153	103	102	555	913
San Mateo Total	4,595	2,507	2,830	6,486	16,418

* The jurisdictions in Napa, San Mateo, and Solano counties each chose to form a subregion to carry out the RHNA process. These numbers reflect the final allocations adopted by each of the three subregions.

Santa Clara County

	Very Low	Low	Moderate	Above Moderate	Total
Campbell	253	138	151	391	933
Cupertino	356	207	231	270	1,064
Gilroy	236	160	217	475	1,088
Los Altos	169	99	112	97	477
Los Altos Hills	46	28	32	15	121
Los Gatos	201	112	132	174	619
Milpitas	1,004	570	565	1,151	3,290
Monte Sereno	23	13	13	12	61
Morgan Hill	273	154	185	316	928
Mountain View	814	492	527	1,093	2,926
Palo Alto	691	432	278	587	1,988
San Jose	9,233	5,428	6,188	14,231	35,080
Santa Clara	1,050	695	755	1,593	4,093
Saratoga	147	95	104	93	439
Sunnyvale	1,640	906	932	1,974	5,452
Unincorporated	22	13	214	28	277
Santa Clara Total	16,158	9,542	10,636	22,500	58,836

Solano County*

	Very Low	Low	Moderate	Above Moderate	Total
Benicia	94	54	56	123	327
Dixon	50	24	30	93	197
Fairfield	779	404	456	1,461	3,100
Rio Vista	45	36	48	170	299
Suisun City	147	57	60	241	505
Vacaville	287	134	173	490	1,084
Vallejo	283	178	211	690	1,362
Unincorporated	26	15	19	43	103
Solano Total	1,711	902	1,053	3,311	6,977

* The jurisdictions in Napa, San Mateo, and Solano counties each chose to form a subregion to carry out the RHNA process. These numbers reflect the final allocations adopted by each of the three subregions.

Sonoma County

	Very Low	Low	Moderate	Above Moderate	Total
Cloverdale	39	29	31	112	211
Cotati	35	18	18	66	137
Healdsburg	31	24	26	76	157
Petaluma	199	103	121	322	745
Rohnert Park	181	107	127	484	899
Santa Rosa**	1,041	671	759	2,612	5,083
Sebastopol	22	17	19	62	120
Sonoma	24	23	27	63	137
Windsor	120	65	67	188	440
Unincorporated**	126	37	160	192	515
Sonoma Total	1,818	1,094	1,355	4,177	8,444

** Revised to reflect a transfer of RHNA responsibility for very low-, low-, and above moderate-income units from Sonoma County to Santa Rosa as part of the Roseland Area Annexation. This transfer was approved by the ABAG Executive Board in January 2018.



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