Agenda Report Reviewed by:
City Manager:

CITY OF SEBASTOPOL
CITY COUNCIL
AGEND ITEM

Meeting Date: February 16, 2021
To: Honorable Mayor and City Councilmembers
From: Kari Svanstrom, Planning Director
Subject: Regional Housing Need Allocation Update
Recommendation :   That the City Council receive the Informational Item
Funding: Currently Budgeted: _____ Yes _____ No _X____ N/A
                       Net General Fund Cost: N/A
                       Amount: $0

Account Code/Costs authorized in City Approved Budget (if applicable) ___AK_____ (verified by Administrative Services Department)

INTRODUCTION/PURPOSE:
This item is for the City Council to receive an informational report on the Regional Housing Need Allocation (RENA).

BACKGROUND:
In 1969, the state mandated that all California cities, towns and counties must plan for the housing needs of its residents. This state mandate is implemented through each community's General Plan Housing Element, and through the Regional Housing Needs Allocation (RHNA).

DISCUSSION:
As part of the RHNA process, the California Department of Housing and Community Development (HCD), determines the total number of new homes the 9-County Bay Area needs to build—and how affordable those homes need to be—in order to meet the housing needs of people at all income levels. For the 8 year period covering 2023-2031, HCD has determined that the Bay Area's RHNA is 441,176 housing units, about half of which must be affordable. By contrast, the Bay Area's RHNA for the current 8 year period ending in 2022, was 187,990 units. This represents an increase of almost 135%, which is reflective of our state's dire housing crisis and is consistent with the increases seen in other parts of the state.

The Association of Bay Area Governments (ABAG), works through the Housing Methodology Committee (HMC) to distribute a share of the region's housing need to each city, town and county in the nine-county Bay Area. One methodology must be chosen to allocate all of the Bay Area's growth to each of the counties and cities, regardless of their vast differences. Each local government must then update their Housing Element to demonstrate that there are sufficient sites for this to be built, and that the necessary policies and strategies to meet the community's housing needs are in place. Each local government must zone enough of its land to ensure that sufficient housing can be built to accommodate their housing need, based on their RHNA numbers. If a community does not have adequate suitable land to zone for high-density housing, then will not receive state certification of its Housing Element. Most state funding programs for housing and community benefits require a state-certified Housing Element, so this is critically important.

Housing Methodology Committee
The ABAG Housing Methodology Committee (HMC) began meeting in October 2019 to consider and select a methodology that would allocate the total 441,176 housing units that the state determined the Bay Area region

would need to build. These units would be allocated to each local government in the Bay Area, within the following affordability categories:

- very low income (up to 50% area median income),
- low income (up to 80% area median income),
- moderate income (up to 120% area median income) and,
- above-moderate (regular market-rate housing.)

Each county in the region had at least two representatives on the HMC: one planning staff and one elected. Some larger counties had more representatives. Sonoma County's planning representative was Jane Riley, Comprehensive Planning Manager, Permit Sonoma, and Noah Housh, Director of Community Development, City of Cotati served as an alternate. Sonoma County's elected representative was Councilmember Susan Adams with the City of Rohnert Park. Councilmember Adams also sits on the ABAG Regional Planning Committee. The group of Sonoma County's planning directors have met throughout the process to receive updates and discuss input for the HMC with our representatives.

In its earlier meetings, the HMC set its general goals for the process to ensure that the majority of housing units were located near jobs and transit, and that areas with the best opportunities (deemed "high resource areas") were assigned a fair share of affordable units in order to increase equity. At its June 2020 meeting, the HMC came to consensus around several Guiding Principles to guide the development of the RHNA methodology, including:

1. More housing should go to jurisdictions with more jobs than housing and to communities exhibiting racial and economic exclusion
2. The methodology should focus on:
    a) Equity, as represented by High Opportunity Areas
    b) Relationship between housing and jobs; however, no consensus on specific factor
3. Equity factors need to be part of total allocation, not just income allocation
4. Do not limit allocations based on past RHNA
5. Housing in high hazard areas is a concern, but RHNA may not be the best tool to address

As methodologies were being considered, ABAG staff strongly advocated using the draft (and, when completed, final) Plan Bay Area 2050's projected population model as the "baseline" data in the RHNA methodology. Plan Bay Area 2050 makes assumptions about appropriate sites for high-density housing and unfortunately has included several inappropriate locations such as, flood plains, rural recreational land, industrial land and land in areas at high risk of wildfires in their modeling.

Using this data in the HMC methodology has resulted in the rural and agricultural parts of the North Bay receiving high projected RHNA allocations that push growth outside of city limits and into areas without utilities or other services. In Sonoma County, all local governments have voter-approved Urban Growth Boundaries intended to focus housing growth within city limits while preventing sprawl in the unincorporated county. The local Urban Growth Boundaries ensure that jurisdictions comply with the State's Climate Action goals, which includes lowering Vehicle Miles Traveled (VMT) and prioritizing transit oriented in-fill development. While the 2023-2031 RHNA allocation to the entire ABAG region will be increasing 135% over the current cycle's allocation, the RHNA increase to unincorporated North Bay counties were projected to have far greater percentages of the growth (See table 1 below). Note, these were modified substantially in the final draft RHNA due to changes as discussed below.

TABLE 1: DRAFT PLAN BAY AREA 2050 (Not adopted, revised downward in Final PBA2050)
UNINCORPORATED RURAL COMMUNITIES PROJECTED RHNA – 2023-2031

Jurisdiction	RHNA 2015-2023	Projected 2023-2031	% Increase
Uninc. Marin	185	3830	*1970%*
Uninc. Napa	180	790	*339%*
Uninc. Solano	103	1020	*890%*
Uninc. Sonoma	515	5250	*919%*
Total ABAG Allocation	**187990**	**441,176**	*135%*

Sebastopol's RHNA allocation in this draft was approximately 410 units, spread across the various income levels (very low, low, moderate, above moderate).

Sonoma County Transportation Agency (SCTA) hosts a monthly Housing Ad Hoc Committee with the County's planning directors and/or housing staff from each jurisdiction in the County. This group nominated and selected the staff representative and alternate to represent Sonoma County on the HMC, and has been debriefing and discussing the progress of the HMC at their monthly meetings.

This group collaborated on a letter to the ABAG Regional Planning Committee ahead of its October 1, 2020, meeting, expressing concerns about the inaccuracies in the Plan Bay Area Blueprint 2050 data and requesting additional time to review this data and provide input to ABAG (see attachment). The letter also requested that areas that have been identified for growth in the draft Plan Bay Area 2050 Blueprint but that are not suitable for high-density housing be excluded from a jurisdiction's RHNA allocation for the 6th cycle unless infrastructure can be provided within the 8-year RHNA cycle. ABAG responded with additional opportunities to meet with their planning team and to review and provide corrections to data used in the modeling projections. Sebastopol met several times with ABAG to understand and discuss the methodology and impacts on rural areas, as well as providing corrections to the data assumptions for both Sebastopol and the surrounding unincorporated areas. This included comments on many of the issues expressed in the county-wide letter sent to ABAG related to flood plain restrictions, transportation issues, and infrastructure capacity, vehicle miles traveled and Greenhouse Gas (GHG) gas emissions as well as parcel-specific comments and corrections.

ABAG/HMC Timeline
On September 18, 2020, the HMC selected and voted on a draft methodology ("Option 8A") for recommendation to the ABAG Regional Planning Committee and Executive Board. This option uses Plan Bar Area 2050 baseline population data with a focus on placing housing near jobs and high opportunity areas. On October 1, 2020, the ABAG Regional Planning Committee recommended the HMC's preferred methodology to the ABAG Executive Board. The Executive Board approved releasing the proposed methodology for public comment at its October 15, 2020 meeting, starting a public comment period from October 25 to November 27, and a public hearing November 12. (Both the Regional Planning Committee and Executive Board include elected representatives from each County).

Between December and January, ABAG staff finalized the Plan Bay Area 2050, which included a number of adjustments/additions to the Blueprint strategies in order to meet the required GHG reductions, as well as changes made to the underlying data as a result of consultations with local jurisdiction staff.
The Executive Board approved the recommended methodology, with a further factor to adjust for equity, on January 21, 2021. This final methodology adjusted the RHNA allocation for some communities significantly, including for unincorporated north bay counties and for Sebastopol. Sebastopol now has a *draft RHNA allocation of 213,* while Sonoma County jurisdictions RHNA was reduced by about 3,000 units from the Draft PBA 2050 to the

Final PBA 2050, and unincorporated Sonoma County was reduced by over Table 2 includes the final draft allocation for Sonoma County jurisdictions: (see attachments for other jurisdictions):

TABLE 2:

Jurisdiction	2015-2023 RHNA Cycle (current)	Draft RHNA Methodology – DRAFT Plan Bay Area 2050 (October 2020)	FINAL DRAFT RHNA Methodology (Adopted by ABAG January 2021, with Equity Adjustment)	Percentage change from 2015-2023 Cycle to
Cloverdale	211	300	278	32%
Cotati	137	270	234	71%
Healdsburg	157	350	476	203%
Petaluma	745	2100	1,910	156%
Rohnert Park	899	1260	1,580	76%
Santa Rosa	5083	6530	4,686	-1%
Sebastopol	120	420	213	77%
Sonoma	137	330	311	127%
Windsor	440	710	993	126%
Unincorporated Sonoma County	515	5,250	3,881	654%
TOTAL	8,444	17,520	14,562	72%

NOTE: these are still draft RHNA allocations and will be until final allocations are adopted towards the end of 2021.

Next STeps

The Next step in the RHNA process is for ABAG to submit the recommended methodology to the State HCD for review. In Summer 2021, individual jurisdictions may appeal their draft RHNA numbers to HCD.   By the end of 2021, HCD will publish the final approved RHNA numbers by jurisdiction.

These final RHNA allocations need to be included and accommodated within each jurisdiction's Housing Element in order to have a 'certified' Housing Element and be eligible for a variety of state funding (including transportation funds such as OBAG and other grants).

The next Housing Element Update will be due to the State in January 2023. Steps to get there include technical work (fair housing studies, housing stock assessment, site inventory, etc.), public meetings/hearings,   Given the larger allocations jurisdictions are being given this round, as well as a number of other additional requirements for sites inventory and for the Housing Element due to new stat law, many jurisdictions are beginning their work on their Housing Elements early.

PUBLIC COMMENT:

As of the writing of this staff report, the City has not received any public comment. However, public comment from interested parties following the publication and distribution of this staff report will be provided to the City Council as supplemental materials before or at the meeting. In addition, public comment made be made during the public comment period on this item.

PUBLIC NOTICE:

This item was noticed in accordance with the Ralph M. Brown Act and was available for public viewing and review at least 72 hours prior to scheduled meeting date.

FISCAL IMPACT:

There is no direct fiscal impact associated with the recommended action tonight. However, staff is requesting a mid-year budget allocation out of the General Plan Fund (which is a restricted fund for us updating the Housing

Element every 8 years and the General Plan every 20-30 years), so that work can begin on this project earlier than next fiscal year.

RECOMMENDATION:
Receive report. If desired, schedule a study session for additional discussion on RHNA, Housing Elements, or other topics of interest to the Council.

Attachments:
Sonoma County Planning Director's letter to ABAG
Final Draft allocation for Bay Area jurisdictions

scta rcpa

Sonoma County Transportation Authority
Regional Climate Protection Authority

September 29, 2020

Therese McMillan, Executive Director
Matt Maloney, Director of Regional Planning
MTC/ABAG Regional Planning Committee Members
375 Beale Street, Suite 800
San Francisco, CA 94105-2066

RE: Housing Methodology Committee recommendation – comments and concerns

Dear Ms. McMillan, Mr. Maloney and Members of the Regional Planning Committee:

First, we want to express our gratitude to the entire HMC and ABAG/MTC staff and consultants for supporting this monumental effort. Further the Planning and Community Development Directors and SCTA staff wish to specifically acknowledge the dedication of Gillian Adams, Dave Vautin, Paul Fassinger, Ada Chan, Aksel Olsen, Eli Kaplan and all of the other individuals whom have worked so diligently to support the HMC. We recognize their hard work and appreciate their continued and direct assistance to our jurisdictions.

At its September 18, 2020 meeting, the HMC voted to utilize the draft Plan Bay Area 2050 Blueprint's projected 2050 household data as the baseline in establishing the 6th cycle Regional Housing Need Allocations (RHNA) for Bay Area communities. Because the Draft Plan Bay Area (PBA) Blueprint provides similar guiding principles (https://www.planbayarea.org/2050-plan/plan-bay-area-2050-blueprint) as those adopted by the HMC, this seems a strategic and logical approach that would move the Bay Area toward these guiding principles. However, this assumes the underlying data and assumptions in the 2050 Blueprint model are accurate and comprehensive. In practice, North Bay communities are realizing, *the implications of using a 30-year projection to establish an 8-year RHNA are significant and may have unintended consequences, especially for our rural communities and areas of unincorporated counties.* Given this, if the draft PBA is to form the baseline for the RHNA allocation, then it is critical that:

1) The data input and development assumptions used to predict how land will develop must be accurate and account for existing real-world constraints; and

2) The growth assumptions must account for the two very different time frames (8 years vs. 30 years) and appropriately account for (but not over emphasize), the widespread economic crisis caused by the COVID-19 pandemic.

To ensure proper accounting for these issues, the Sonoma County Community Development Directors, Planning Directors and SCTA planners have repeatedly requested the data and the development assumptions that ABAG/MTC is utilizing for its modeling. Unfortunately, we have yet to receive the development assumptions, and only received the GIS (layer) zoning assumptions on Friday, September 25. Despite the delay in providing the requested data, ABAG staff has requested our communities each report back on any errors in this data by Wednesday, September 30, effectively providing our staff less than 3 working days to examine GIS data that

took years to build and to identify its errors. As identified below, a few hours spent examining this data has already revealed significant errors that appear to be erroneously inflating populations and projections in the unincorporated county and in some rural cities. ***Additional time is needed for the comprehensive data and assumptions used in the draft PBA Blueprint to be provided by AGAB/MTC staff, and to be truth-tested to ensure proper accounting for our unique community constraints. This need for additional time is only compounded by the tragic impacts of the Shady and Glass fires currently ravaging our communities.***

Data errors identified by Sonoma County jurisdictions

Without having the requested GIS layers from PBA available to check for errors, local staff have resorted to using the static .pdf graphic provided to each jurisdiction by ABAG. These .pdf maps are not interactive and do not provide any wayfinding information such as streets and roads to assist with orienting and ensuring accuracy with the review. Nonetheless, North Bay staff toiled to make side-by-side comparisons with our own GIS maps and have identified several significant errors.

Specifically, high-density housing assumptions are made in the PBA 2050 data in the following areas, either erroneously or in violation of RHNA objectives:

- In graveyards
- In floodways
- On rural recreational lands many miles from any services (at least 20 instances in unincorporated county)
- Adjacent to freeways with high pollution emission rates
- In industrially designated areas adjacent to noxious land uses
- In areas identified and certified as Priority Production Areas by ABAG/MTC
- Increased densities adjacent to high wildfire areas

In several unincorporated areas, the shape files for high-density housing do not have any relationship to parcel boundaries, roads or zoning districts; rather they appear to have been included randomly. There are clearly a large number of mapping errors that need to be corrected based on existing and known constraints (such as those listed above). If such significant errors were found in only a few hours and using information provided in a limited format, it calls into question the accuracy of the growth projections of the entire model.

While ABAG staff did contact local jurisdictions to ask them to review their data a year ago, the data was provided only as a spreadsheet with hundreds or thousands of data entries and no mapping or development assumptions being given. As such, this format did not result in a true "project referral" or productive engagement as the results clearly identify. Now that the maps have been included and staff can visually check for errors, the Directors and SCTA staff ***request a review period of three weeks following receipt of the requested data and development assumptions from ABAG staff, to review and identify errors in mapping and development assumptions. Further, this feedback needs to be meaningfully incorporated into the data and modeling projections before the RHNA baseline is set and growth is allocated.***

Infrastructure Constraints and Sites Requirements

All Sonoma County jurisdictions are concerned about the assumptions made in the draft PBA related to infrastructure. The resulting development assumptions (which we still have not received) made in the 30-year 2050 PBA timeline do not translate well into the 6th cycle RHNA planning period of 8 years. The use of PBA 2050 development assumptions and 25-year growth projections, which do not account for the 8-year RHNA timeline, deliver obscenely high numbers to unincorporated and rural communities which currently lack the infrastructure to serve the projected high-density growth. It is important to note that HCD is legislatively prohibited from allowing jurisdictions to "count" sites that will not be available for development within the 8-year housing element period. The end result is that jurisdictions allocated obscenely high numbers of growth without the means to develop the infrastructure needed to support such growth, will never be able to identify adequate sites to meet the statutory sites criteria and thus will not be able to achieve certification of their housing elements. Because grant funding for housing now requires a certified housing element, the use of the PBA assumptions will preclude these jurisdictions from receiving any funding to support housing development. *The Directors and SCTA staff request that such areas identified for growth in the draft PBA 2050 Blueprint NOT be included in a jurisdiction's RHNA allocation for the 6th cycle unless infrastructure can be provided within the 8-year timeframe of the planning cycle. Setting these jurisdictions up for Housing Element failure is not good planning policy and will not result in housing being built.*

Environmental Justice, Climate Change and Covid-19 Related Issues

The chosen allocation methodology must meet the six statutory objectives of RHNA, including affirmatively furthering fair housing. This means that the RHNA allocation must take *meaningful action to overcome patterns of segregation* and to *replace segregated living patterns* with integrated and balanced communities. Unfortunately, mapping done for the PBA 2020 Blueprint reflects a perpetuation of segregated housing patterns by placing higher-density housing allocations to environmentally inferior areas that are already home to the region's poorest populations by virtue of having the lowest land costs. This, in turn, causes the RHNA allocation methodology to fail to meet the 5th statutory objective of RHNA. *If the draft PBA 2050 Blueprint is to be used as a baseline for the RHNA allocation, the PBA data and projections must also be corrected to meet the six statutory objectives of RHNA, including to remove assumed high-density housing developments from areas that are environmentally inferior such as in flood zones, in polluted areas, adjacent to freeways, within industrial areas with high emissions and in high wildfire areas.*

Additionally, the specific development assumptions for PBA2050 should be made available for comment by the public, and then discussed by the Regional Planning Committee (RPC), HMC and ABAG Executive Board. For instance, it is our understanding that future sea level rise (e.g. current and future flood plain areas) is included as a development constraint for coastal areas, but neither current nor future FEMA regulatory flood plain areas outside of coastal communities are being included. This is not good planning and is an inconsistent approach to identifying and applying the development constraints of climate change, across all Bay Area communities. This is yet another example of why the underlying data and assumptions must be made available, so that local planners can assist ABAG/MTC staff in identifying and correcting these types of issues using our collective localize

knowledge of the issues we understand as lead agencies. Similarly, the additional adjustments to the development constraints and assumptions resulting from the Covid-19 pandemic (such as telecommuting assumptions) should also be provided to the public for discussion by the RPC, HMC and ABAG Executive Board.

In summary, while the choice to use PBA 2050 data as the baseline for RHNA allocations makes sense and can achieve good planning policy (such as thoughtful planning for development in high hazard areas), the use of this data must include means to separate the 8-year RHNA cycle from the 25-year growth model horizons. Without an effective accounting for constraints and allowance for needed corrections, the resulting growth projections will not meet the statutory objectives of RHNA and will counter-productively preclude jurisdictions from achieving Housing Element certification. Ultimately, this lack of statutory conformance and reduction in housing grant funding will result in less homes being built overall, and for the homes that are built perpetuating the discriminatory policies that have created the issues we are now trying to solve. Please take these comments under serious consideration and take utilize the feedback provided to improve the PBA 2050 modeling.

Thank you,

Sonoma County Planning and Community Development Directors

Jeffery Beiswenger
Planning Manager, City of Rohnert Park

Clare Hartman
Deputy Director – Planning, City of Santa Rosa

Heather Hines
Planning Manager, City of Petaluma

Noah Housh
Director of Community Development, City of Cotati

Jessica Jones
Community Development Director, Town of Windsor

Janet Spilman
Janet Spilman (Oct 5, 2020 14:55 PDT)

Janet Spilman
Director of Planning, Sonoma County Transportation Authority

David Storer, AICP
David Storer, AICP (Sep 30, 2020 11:57 PDT)

David Storer
Planning and Community Services Director, City of Sonoma

Kari Svanstrom
Kari Svanstrom (Sep 30, 2020 08:19 PDT)

Kari Svanstrom
Planning Director, City of Sebastopol

Kevin Thompson
KEvin Thompson (Sep 30, 2020 8:00 PDT)

Kevin Thompson
Assistant City Manager/Community Development Director, City of Cloverdale

Tennis Wick

Tennis Wick
Director, Permit Sonoma, County of Sonoma

David Woltering, AICP
David Woltering, AICP (Oct 2, 2020 11:28 PDT)

David Woltering
Interim Community Development Director, City of Healdsburg

Jurisdiction Illustrative Allocations by Income Category

Note: the jurisdiction-specific allocations shown are for illustrative purposes only. ABAG will issue Final Allocations by the end of 2021.

Jurisdiction	Jurisdiction Share of 2050 Households*		Proposed RHNA Methodology (Baseline: 2050 Households - Draft Blueprint)					Draft RHNA Methodology - Unmodified Allocation (Baseline: 2050 Households - Final Blueprint)					Comparison of Total RHNA		Draft RHNA Methodology - With Equity Adjustment (Baseline: 2050 Households - Final Blueprint)					Comparison of Total RHNA	
	Draft Blueprint	Final Blueprint	Very Low Income	Low Income	Moderate Income	Above Moderate Income	Total	Very Low Income	Low Income	Moderate Income	Above Moderate Income	Total	Unit Change from Proposed to Draft	Percent Change from Proposed to Draft	Very Low Income	Low Income	Moderate Income	Above Moderate Income	Total	Unit Change from Draft to Draft with Equity Adjustment	Percent Change from Draft to Draft with Equity Adjustment
Alameda	0.994%	1.100%	1,318	759	786	2,033	4,896	1,455	837	868	2,246	5,406	510	10%	1,422	818	868	2,246	5,354	(52)	-1%
Albany	0.211%	0.206%	324	187	180	464	1,155	315	182	175	453	1,125	(30)	-3%	308	178	175	453	1,114	(11)	-1%
Berkeley	1.452%	1.701%	2,148	1,237	1,211	3,134	7,730	2,504	1,441	1,416	3,664	9,025	1,295	17%	2,446	1,408	1,416	3,664	8,934	(91)	-1%
Dublin	0.687%	0.705%	1,060	611	547	1,413	3,631	1,085	625	560	1,449	3,719	88	2%	1,085	625	560	1,449	3,719	-	0%
Emeryville	0.399%	0.493%	377	217	249	646	1,489	462	265	308	797	1,832	343	23%	451	259	308	797	1,815	(17)	-1%
Fremont	2.694%	2.434%	4,040	2,326	2,214	5,728	14,308	3,640	2,096	1,996	5,165	12,897	(1,411)	-10%	3,640	2,096	1,996	5,165	12,897	-	0%
Hayward	1.393%	1.571%	980	564	726	1,880	4,150	1,100	632	817	2,115	4,664	514	12%	1,075	617	817	2,115	4,624	(40)	-1%
Livermore	1.130%	1.269%	1,109	639	620	1,606	3,974	1,240	714	696	1,799	4,449	475	12%	1,316	758	696	1,799	4,569	120	3%
Newark	0.578%	0.609%	453	260	303	784	1,800	475	274	318	824	1,891	91	5%	464	268	318	824	1,874	(17)	-1%
Oakland	6.503%	6.338%	6,880	3,962	4,584	11,860	27,286	6,665	3,838	4,457	11,533	26,493	(793)	-3%	6,512	3,750	4,457	11,533	26,252	(241)	-1%
Piedmont	0.099%	0.098%	166	96	94	243	599	163	94	92	238	587	(12)	-2%	163	94	92	238	587	-	0%
Pleasanton	0.909%	1.135%	1,405	810	717	1,855	4,787	1,750	1,008	894	2,313	5,965	1,178	25%	1,750	1,008	894	2,313	5,965	-	0%
San Leandro	0.913%	1.137%	713	411	561	1,451	3,136	882	507	696	1,802	3,887	751	24%	862	495	696	1,802	3,855	(32)	-1%
Unincorporated Alameda	1.347%	1.419%	1,221	704	726	1,879	4,530	1,281	738	763	1,976	4,758	228	5%	1,252	721	763	1,976	4,712	(46)	-1%
Union City	0.702%	0.727%	565	326	370	957	2,218	582	335	382	988	2,287	69	3%	862	496	382	988	2,728	441	19%
Alameda County	**20.011%**	**20.942%**	**22,759**	**13,109**	**13,888**	**35,933**	**85,689**	**23,599**	**13,586**	**14,438**	**37,362**	**88,985**	**3,296**	**4%**	**23,608**	**13,591**	**14,438**	**37,362**	**88,999**	**14**	**0%**
Antioch	1.032%	1.270%	661	380	402	1,038	2,481	811	467	493	1,275	3,046	565	23%	792	456	493	1,275	3,016	(30)	-1%
Brentwood	0.618%	0.647%	395	228	237	614	1,474	411	237	247	641	1,536	62	4%	402	232	247	641	1,522	(14)	-1%
Clayton	0.115%	0.111%	176	102	87	227	592	170	97	84	219	570	(22)	-4%	170	97	84	219	570	-	0%
Concord	1.306%	1.725%	1,006	579	643	1,662	3,890	1,322	762	847	2,190	5,121	1,231	32%	1,292	744	847	2,190	5,073	(48)	-1%
Danville	0.410%	0.424%	632	365	328	848	2,173	652	376	338	875	2,241	68	3%	652	376	338	875	2,241	-	0%
El Cerrito	0.339%	0.405%	289	166	203	524	1,182	342	197	241	624	1,404	222	19%	334	192	241	624	1,391	(13)	-1%
Hercules	0.240%	0.264%	164	95	115	297	671	179	104	126	327	736	65	10%	342	199	126	327	994	258	35%
Lafayette	0.297%	0.382%	468	269	255	659	1,651	599	344	326	845	2,114	463	28%	599	344	326	845	2,114	-	0%
Martinez	0.381%	0.383%	357	205	220	569	1,351	358	206	221	573	1,358	7	1%	350	201	221	573	1,345	(13)	-1%
Moraga	0.193%	0.204%	302	174	163	422	1,061	318	183	172	445	1,118	57	5%	318	183	172	445	1,118	-	0%
Oakley	0.395%	0.450%	251	145	152	393	941	286	165	172	446	1,069	128	14%	279	161	172	446	1,058	(11)	-1%
Orinda	0.197%	0.235%	313	180	181	468	1,142	372	215	215	557	1,359	217	19%	372	215	215	557	1,359	-	0%
Pinole	0.209%	0.183%	142	82	99	256	579	124	71	87	223	505	(74)	-13%	121	69	87	223	500	(5)	-1%
Pittsburg	0.630%	0.787%	419	242	273	707	1,641	518	298	340	880	2,036	395	24%	506	291	340	880	2,017	(19)	-1%
Pleasant Hill	0.423%	0.368%	522	300	293	758	1,873	451	261	254	657	1,623	(250)	-13%	564	327	254	657	1,802	179	11%
Richmond	1.403%	1.227%	988	569	731	1,891	4,179	860	496	638	1,651	3,645	(534)	-13%	840	485	638	1,651	3,614	(31)	-1%
San Pablo	0.261%	0.248%	187	108	139	359	793	177	102	132	341	752	(41)	-5%	173	100	132	341	746	(6)	-1%
San Ramon	0.898%	0.975%	1,382	796	708	1,830	4,716	1,497	862	767	1,985	5,111	395	8%	1,497	862	767	1,985	5,111	-	0%
Unincorporated Contra Costa	1.658%	2.203%	1,609	928	917	2,373	5,827	2,131	1,227	1,217	3,147	7,722	1,895	33%	2,082	1,199	1,217	3,147	7,645	(77)	-1%
Walnut Creek	1.118%	1.148%	1,655	954	869	2,247	5,725	1,696	976	890	2,304	5,866	141	2%	1,657	954	890	2,304	5,805	(61)	-1%
Contra Costa County	**12.124%**	**13.638%**	**11,918**	**6,867**	**7,015**	**18,142**	**43,942**	**13,274**	**7,646**	**7,807**	**20,205**	**48,932**	**4,990**	**11%**	**13,342**	**7,687**	**7,807**	**20,205**	**49,041**	**109**	**0%**
Belvedere	0.033%	0.032%	49	28	23	61	161	49	28	23	60	160	(1)	-1%	49	28	23	60	160	-	0%
Corte Madera	0.135%	0.138%	209	121	106	274	710	213	123	108	281	725	15	2%	213	123	108	281	725	-	0%
Fairfax	0.104%	0.098%	158	91	75	195	519	149	86	71	184	490	(29)	-6%	149	86	71	184	490	-	0%
Larkspur	0.197%	0.189%	303	175	150	390	1,018	291	168	145	375	979	(39)	-4%	291	168	145	375	979	-	0%
Mill Valley	0.161%	0.164%	248	142	124	320	834	252	144	126	326	848	14	2%	262	150	126	326	864	16	2%
Novato	0.669%	0.672%	582	335	332	858	2,107	583	336	332	860	2,111	4	0%	570	328	332	860	2,090	(21)	-1%
Ross	0.023%	0.022%	35	20	17	44	116	33	19	16	41	109	(7)	-6%	34	20	16	41	111	2	2%
San Anselmo	0.149%	0.167%	226	130	108	280	744	253	145	121	314	833	89	12%	253	145	121	314	833	-	0%
San Rafael	0.895%	1.048%	752	433	446	1,154	2,785	877	504	521	1,350	3,252	467	17%	857	492	521	1,350	3,220	(32)	-1%
Sausalito	0.125%	0.125%	200	115	115	296	726	200	115	114	295	724	(2)	0%	200	115	114	295	724	-	0%
Tiburon	0.123%	0.126%	186	107	91	236	620	193	110	93	243	639	19	3%	193	110	93	243	639	-	0%
Unincorporated Marin	0.893%	0.822%	1,157	666	557	1,440	3,820	1,063	611	512	1,324	3,510	(310)	-8%	1,101	633	512	1,324	3,570	60	2%
Marin County	**3.507%**	**3.605%**	**4,105**	**2,363**	**2,144**	**5,548**	**14,160**	**4,156**	**2,389**	**2,182**	**5,653**	**14,380**	**220**	**2%**	**4,172**	**2,398**	**2,182**	**5,653**	**14,405**	**25**	**0%**

Jurisdiction Illustrative Allocations by Income Category

Note: the jurisdiction-specific allocations shown are for illustrative purposes only. ABAG will issue Final Allocations by the end of 2021.

Jurisdiction	Jurisdiction Share of 2050 Households*		Proposed RHNA Methodology (Baseline: 2050 Households - Draft Blueprint)					Draft RHNA Methodology - Unmodified Allocation (Baseline: 2050 Households - Final Blueprint)					Comparison of Total RHNA		Draft RHNA Methodology - With Equity Adjustment (Baseline: 2050 Households - Final Blueprint)					Comparison of Total RHNA	
	Draft Blueprint	Final Blueprint	Very Low Income	Low Income	Moderate Income	Above Moderate Income	Total	Very Low Income	Low Income	Moderate Income	Above Moderate Income	Total	Unit Change from Proposed to Draft	Percent Change from Proposed to Draft	Very Low Income	Low Income	Moderate Income	Above Moderate Income	Total	Unit Change from Draft to Draft with Equity Adjustment	Percent Change from Draft to Draft with Equity Adjustment
American Canyon	0.190%	0.176%	124	72	81	209	486	115	67	75	194	451	(35)	-7%	112	65	75	194	446	(5)	-1%
Calistoga	0.090%	0.052%	58	32	33	86	209	32	19	19	50	120	(89)	-43%	31	19	19	50	119	(1)	-1%
Napa	0.815%	0.769%	550	317	339	876	2,082	516	298	319	825	1,958	(124)	-6%	504	291	319	825	1,939	(19)	-1%
St. Helena	0.073%	0.068%	46	27	27	71	171	43	24	26	66	159	(12)	-7%	104	58	26	66	254	95	60%
Unincorporated Napa	0.288%	0.279%	218	126	125	323	792	210	121	120	312	763	(29)	-4%	369	212	120	312	1,013	250	33%
Yountville	0.031%	0.029%	20	12	12	32	76	19	11	12	30	72	(4)	-5%	19	11	12	30	72	-	0%
Napa County	**1.487%**	**1.373%**	**1,016**	**586**	**617**	**1,597**	**3,816**	**935**	**540**	**571**	**1,477**	**3,523**	**(293)**	**-8%**	**1,139**	**656**	**571**	**1,477**	**3,843**	**320**	**9%**
San Francisco	**12.394%**	**14.304%**	**18,637**	**10,717**	**11,910**	**30,816**	**72,080**	**21,359**	**12,294**	**13,717**	**35,470**	**82,840**	**10,760**	**15%**	**20,867**	**12,013**	**13,717**	**35,470**	**82,067**	**(773)**	**-1%**
Atherton	0.065%	0.072%	74	43	51	130	298	81	47	56	144	328	30	10%	94	54	56	144	348	20	6%
Belmont	0.302%	0.305%	485	280	282	728	1,775	488	281	283	733	1,785	10	1%	488	281	283	733	1,785	-	0%
Brisbane	0.742%	0.423%	573	330	534	1,382	2,819	324	187	303	785	1,599	(1,220)	-43%	317	183	303	785	1,588	(11)	-1%
Burlingame	0.572%	0.546%	926	534	555	1,434	3,449	883	509	529	1,368	3,289	(160)	-5%	863	497	529	1,368	3,257	(32)	-1%
Colma	0.047%	0.052%	40	24	33	86	183	45	26	37	96	204	21	11%	44	25	37	96	202	(2)	-1%
Daly City	1.040%	0.945%	1,150	661	841	2,175	4,827	1,039	598	762	1,971	4,370	(457)	-9%	1,336	769	762	1,971	4,838	468	11%
East Palo Alto	0.219%	0.206%	179	104	169	437	889	169	97	159	410	835	(54)	-6%	165	95	159	410	829	(6)	-1%
Foster City	0.349%	0.327%	556	320	321	831	2,028	520	299	300	777	1,896	(132)	-7%	520	299	300	777	1,896	-	0%
Half Moon Bay	0.147%	0.149%	93	54	54	141	342	93	54	54	141	342	-	0%	180	105	54	141	480	138	40%
Hillsborough	0.107%	0.097%	169	97	95	245	606	153	88	87	223	551	(55)	-9%	155	89	87	223	554	3	1%
Menlo Park	0.500%	0.481%	773	445	517	1,340	3,075	740	426	496	1,284	2,946	(129)	-4%	740	426	496	1,284	2,946	-	0%
Millbrae	0.375%	0.350%	618	356	386	999	2,359	575	331	361	932	2,199	(160)	-7%	575	331	361	932	2,199	-	0%
Pacifica	0.359%	0.356%	557	321	294	761	1,933	551	317	291	753	1,912	(21)	-1%	538	310	291	753	1,892	(20)	-1%
Portola Valley	0.045%	0.045%	70	41	39	101	251	70	40	39	99	248	(3)	-1%	73	42	39	99	253	5	2%
Redwood City	1.102%	0.984%	1,284	739	885	2,291	5,199	1,141	658	789	2,041	4,629	(570)	-11%	1,115	643	789	2,041	4,588	(41)	-1%
San Bruno	0.486%	0.730%	481	278	382	989	2,130	721	415	573	1,483	3,192	1,062	50%	704	405	573	1,483	3,165	(27)	-1%
San Carlos	0.398%	0.455%	647	372	383	991	2,393	739	425	438	1,133	2,735	342	14%	739	425	438	1,133	2,735	-	0%
San Mateo	1.338%	1.419%	1,722	991	1,111	2,873	6,697	1,819	1,047	1,175	3,040	7,081	384	6%	1,777	1,023	1,175	3,040	7,015	(66)	-1%
South San Francisco	0.923%	0.929%	892	513	717	1,856	3,978	892	514	720	1,863	3,989	11	0%	872	502	720	1,863	3,957	(32)	-1%
Unincorporated San Mateo	0.827%	0.809%	852	490	443	1,148	2,933	830	479	433	1,121	2,863	(70)	-2%	811	468	433	1,121	2,833	(30)	-1%
Woodside	0.057%	0.058%	90	52	51	133	326	90	52	52	134	328	2	1%	90	52	52	134	328	-	0%
San Mateo County	**10.002%**	**9.740%**	**12,231**	**7,045**	**8,143**	**21,071**	**48,490**	**11,963**	**6,890**	**7,937**	**20,531**	**47,321**	**(1,169)**	**-2%**	**12,196**	**7,024**	**7,937**	**20,531**	**47,688**	**367**	**1%**
Campbell	0.741%	0.563%	1,017	585	659	1,703	3,964	770	444	499	1,292	3,005	(959)	-24%	752	434	499	1,292	2,977	(28)	-1%
Cupertino	0.980%	0.724%	1,619	932	1,023	2,648	6,222	1,193	687	755	1,953	4,588	(1,634)	-26%	1,193	687	755	1,953	4,588	-	0%
Gilroy	0.523%	0.461%	410	236	228	590	1,464	359	207	200	519	1,285	(179)	-12%	669	385	200	519	1,773	488	38%
Los Altos	0.348%	0.301%	580	333	377	977	2,267	501	288	326	843	1,958	(309)	-14%	501	288	326	843	1,958	-	0%
Los Altos Hills	0.084%	0.076%	139	81	91	234	545	125	72	82	210	489	(56)	-10%	125	72	82	210	489	-	0%
Los Gatos	0.326%	0.335%	523	301	311	804	1,939	537	310	320	826	1,993	54	3%	537	310	320	826	1,993	-	0%
Milpitas	1.228%	1.257%	1,653	952	1,108	2,866	6,579	1,685	970	1,131	2,927	6,713	134	2%	1,685	970	1,131	2,927	6,713	-	0%
Monte Sereno	0.032%	0.032%	51	30	31	80	192	51	30	31	79	191	(1)	-1%	52	30	31	79	192	1	1%
Morgan Hill	0.444%	0.410%	291	168	189	488	1,136	268	155	174	450	1,047	(89)	-8%	262	151	174	450	1,037	(10)	-1%
Mountain View	1.772%	1.754%	2,876	1,656	1,909	4,939	11,380	2,838	1,635	1,885	4,880	11,238	(142)	-1%	2,773	1,597	1,885	4,880	11,135	(103)	-1%
Palo Alto	1.541%	0.935%	2,573	1,482	1,673	4,330	10,058	1,556	896	1,013	2,621	6,086	(3,972)	-39%	1,556	896	1,013	2,621	6,086	-	0%
San Jose	15.242%	14.426%	16,391	9,437	11,344	29,350	66,522	15,444	8,892	10,711	27,714	62,761	(3,761)	-6%	15,089	8,688	10,711	27,714	62,202	(559)	-1%
Santa Clara	2.184%	2.135%	3,020	1,739	2,031	5,257	12,047	2,940	1,692	1,981	5,126	11,739	(308)	-3%	2,872	1,653	1,981	5,126	11,632	(107)	-1%
Saratoga	0.343%	0.280%	556	321	341	882	2,100	454	261	278	719	1,712	(388)	-18%	454	261	278	719	1,712	-	0%
Sunnyvale	2.262%	2.088%	3,227	1,858	2,206	5,707	12,998	2,968	1,709	2,032	5,257	11,966	(1,032)	-8%	2,968	1,709	2,032	5,257	11,966	-	0%
Unincorporated Santa Clara	1.065%	0.815%	1,113	641	664	1,719	4,137	848	488	508	1,312	3,156	(981)	-24%	829	477	508	1,312	3,126	(30)	-1%
Santa Clara County	**29.114%**	**26.591%**	**36,039**	**20,752**	**24,185**	**62,574**	**143,550**	**32,537**	**18,736**	**21,926**	**56,728**	**129,927**	**(13,623)**	**-9%**	**32,317**	**18,608**	**21,926**	**56,728**	**129,579**	**(348)**	**0%**

Jurisdiction Illustrative Allocations by Income Category

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Jurisdiction	Jurisdiction Share of 2050 Households*		Proposed RHNA Methodology (Baseline: 2050 Households - Draft Blueprint)					Draft RHNA Methodology - Unmodified Allocation (Baseline: 2050 Households - Final Blueprint)					Comparison of Total RHNA		Draft RHNA Methodology - With Equity Adjustment (Baseline: 2050 Households - Final Blueprint)					Comparison of Total RHNA	
	Draft Blueprint	Final Blueprint	Very Low Income	Low Income	Moderate Income	Above Moderate Income	Total	Very Low Income	Low Income	Moderate Income	Above Moderate Income	Total	Unit Change from Proposed to Draft	Percent Change from Proposed to Draft	Very Low Income	Low Income	Moderate Income	Above Moderate Income	Total	Unit Change from Draft to Draft with Equity Adjustment	Percent Change from Draft to Draft with Equity Adjustment
Benicia	0.286%	0.271%	222	127	143	370	862	208	120	135	351	814	(48)	-6%	203	117	135	351	806	(8)	-1%
Dixon	0.159%	0.146%	103	58	62	159	382	93	54	57	146	350	(32)	-8%	91	53	57	146	347	(3)	-1%
Fairfield	1.438%	1.226%	938	540	596	1,544	3,618	796	458	508	1,314	3,076	(542)	-15%	778	447	508	1,314	3,047	(29)	-1%
Rio Vista	0.098%	0.207%	62	36	36	94	228	130	75	76	197	478	250	110%	127	73	76	197	473	(5)	-1%
Suisun City	0.242%	0.246%	158	91	101	260	610	160	92	101	264	617	7	1%	156	90	101	264	611	(6)	-1%
Unincorporated Solano	0.420%	0.381%	270	155	165	426	1,016	243	140	149	385	917	(99)	-10%	237	137	149	385	908	(9)	-1%
Vacaville	0.828%	0.775%	535	308	328	848	2,019	498	286	305	791	1,880	(139)	-7%	487	279	305	791	1,862	(18)	-1%
Vallejo	1.190%	1.117%	794	457	535	1,385	3,171	741	426	501	1,297	2,965	(206)	-6%	724	416	501	1,297	2,938	(27)	-1%
Solano County	**4.662%**	**4.368%**	**3,082**	**1,772**	**1,966**	**5,086**	**11,906**	**2,869**	**1,651**	**1,832**	**4,745**	**11,097**	**(809)**	**-7%**	**2,803**	**1,612**	**1,832**	**4,745**	**10,992**	**(105)**	**-1%**
Cloverdale	0.126%	0.120%	80	46	47	121	294	76	44	45	116	281	(13)	-4%	74	43	45	116	278	(3)	-1%
Cotati	0.105%	0.092%	68	39	44	116	267	61	35	39	101	236	(31)	-12%	60	34	39	101	234	(2)	-1%
Healdsburg	0.145%	0.121%	93	54	59	153	359	78	45	49	128	300	(59)	-16%	190	109	49	128	476	176	59%
Petaluma	0.781%	0.716%	560	323	342	885	2,110	511	295	313	810	1,929	(181)	-9%	499	288	313	810	1,910	(19)	-1%
Rohnert Park	0.492%	0.625%	322	186	209	541	1,258	408	235	265	686	1,594	336	27%	399	230	265	686	1,580	(14)	-1%
Santa Rosa	2.404%	1.745%	1,727	993	1,064	2,754	6,538	1,247	718	771	1,995	4,731	(1,807)	-28%	1,218	702	771	1,995	4,686	(45)	-1%
Sebastopol	0.163%	0.086%	106	61	67	175	409	56	32	35	92	215	(194)	-47%	55	31	35	92	213	(2)	-1%
Sonoma	0.143%	0.133%	91	53	54	140	338	85	49	50	130	314	(24)	-7%	83	48	50	130	311	(3)	-1%
Unincorporated Sonoma	2.058%	1.540%	1,424	820	840	2,173	5,257	1,060	610	627	1,622	3,919	(1,338)	-25%	1,036	596	627	1,622	3,881	(38)	-1%
Windsor	0.283%	0.260%	184	106	118	305	713	168	97	108	279	652	(61)	-9%	384	222	108	279	993	341	52%
Sonoma County	**6.700%**	**5.440%**	**4,655**	**2,681**	**2,844**	**7,363**	**17,543**	**3,750**	**2,160**	**2,302**	**5,959**	**14,171**	**(3,372)**	**-19%**	**3,998**	**2,303**	**2,302**	**5,959**	**14,562**	**391**	**3%**
	100.000%	100.000%	114,442	65,892	72,712	188,130	441,176	114,442	65,892	72,712	188,130	441,176			114,442	65,892	72,712	188,130	441,176		

* Jurisdiction-level forecasts from Plan Bay Area 2050 Final Blueprint are intended solely for use in crafting the RHNA baseline allocation; official Plan Bay Area 2050 growth pattern focuses on county- and subcounty-level forecasts.