

Report on ABAG to MCCMC¹

September 2020

EXECUTIVE SUMMARY:

- 1) **ABAG/MTC Consolidation:** After having joint committee meetings for the last several years and much discussion, the ABAG Legislation Committee and the MTC Legislation Committee were combined into one. This represents the first consolidated Committee of ABAG/MTC which was approved in August 2020.
- 2) **ABAG BayREN:** BayREN provides single family homeowners, multi-family property owners and small businesses with the technical assistance and financial resources they need to significantly reduce monthly energy costs. They also assist local governments in evaluating and improving compliance with state energy codes. BayREN works with third-party consultants to provide those services. For more information go to their website: <https://www.bayren.org/>
- 3) **Final Blueprint for Plan Bay Area 2050:** ABAG Executive Board approved the Final Blueprint that identifies the Strategies (public policies and investments for the next 30 years) and Growth Geographies (key locations for future focused housing and job growth) along with the Regional Growth Forecast that will provide the foundation for the preferred option for the Draft Plan Bay Area 2050.
- 4) **ABAG Housing (RHNA) Methodology Committee:** The Methodology Committee discussed options for allocating units by income that are aligned with the statutory objectives of RHNA. After, over 3 hours of debate, the Committee recommended that ABAG adopt a methodology that uses the 2050 Households from the Plan Bay Area Blueprint 2050 as the baseline allocation; the Bottoms Up income allocation; and, an addition factor for High Occupancy Areas and Proximity to Jobs (Option 8A). The final decision on the methodology will be made by the ABAG Executive Board in October 2020.
- 5) **ABAG Budget for FY 20/21:** After the June 2020 General Assembly (GA), the ABAG Executive Board took to heart the concerns many of its members expressed about raising the dues. After scrutinizing the budget carefully, staff came back to the Executive Board with a modified budget proposal that required NO increase at all to the dues for FY 20/21. The Executive Board approved this budget modification and thanked CFO Brian Mayhew and his staff for their work.

ABAG/MTC Consolidation: Four years ago, ABAG/MTC voted to consolidate staff and begin working on consolidating governing bodies of both organizations. After staff was consolidated, on July 24, 2019 the MTC/ABAG Governance committee began meeting to evaluate consolidation of the governing bodies. In 2020, the Governance Committee recommended that the ABAG and MTC 'consolidation' begin with consolidating some of the committees that addressed issues of shared interest starting with the ABAG Legislation Committee and the MTC Legislation Committee. These committees were chosen, in part, due to the fact, that these committees had been meeting jointly for several years. After much discussion, the Governance Committee recommended to ABAG and MTC that they consolidate the 2 Legislative committees into one with the following membership:

- 20 members of which MTC would have 9 voting members and 2 non-voting; and, ABAG would have 9 voting members.
- MTC Membership would include: 2 city representatives and 6 supervisors and a BCDC representative
- ABAG Membership would include 5 city representatives and 4 supervisors.

The above composition resulted in a geographic representation of: 7 from the North Bay; 2 from the South Bay; 6 from the East Bay; and, 3 from the West Bay.

At the ABAG Executive Board meeting in August 2020, I moved and Councilmember Lee seconded the motion to approve the Resolution consolidating the two legislative committees by adding the following sections to the Resolution: (i) Over time the ABAG President shall strive to achieve ABAG appointments to the Joint MTC ABAG Legislation Committee such

¹ Marin County Council of Mayors and Councilmembers (MCCMC)

that there shall be a balance between City and County representatives and a geographic balance among the north, south, east and west representatives of the ABAG region. (j) Over time the ABAG members of the Joint MTC ABAG Legislation Committee shall strive to encourage appointments of the Chair and Vice Chair of the committee such that one shall be a city representative and one shall be a county representative. The motion passed unanimously.

Bay Area Regional Energy Network (BayREN): BayREN offers region-wide energy programs, services and resources to members of the public by promoting energy efficient buildings, reducing carbon emissions and building government capacity. Since 2013, ABAG has served as the program administrator and lead agency for Bay Area Regional Energy Network (BayREN) which is a 10-member unincorporated association of local government entities. In October 2019, the California Public Utilities Commission (CPUC) approved BayREN as a permanent program administrator and allowed PG&E and BayREN to begin negotiating contract terms independent of the CPUC. ABAG, on behalf of BayREN, and PG&E have entered into a funding agreement through 2022.

BayREN provides single family homeowners, multi-family property owners and small businesses with the technical assistance and financial resources they need to significantly reduce monthly energy costs.. They also assist local governments in evaluating and improving compliance with state energy codes. BayREN works with third-party consultants to provide those services. The third-party consultants were selected through a competitive process to assist in the implementation of energy efficiency programs. In September 2020, the ABAG Executive Board approved several amended contracts for those third-party consultants.

Plan Bay Area 2050 – Draft Blueprint: On September 17, 2020, the ABAG Executive Board approved the Final Blueprint that identifies the Strategies (public policies and investments for the next 30 years) and Growth Geographies (key locations for future focused housing and job growth) along with the Regional Growth Forecast that will provide the foundation for the preferred option for the Draft Plan Bay Area 2050. The Final Blueprint includes:

- 35 Strategies that include public policies and investments clustered under eleven categories:
 - Transportation: Maintain and Operate the Existing System
 - Transportation: Create Healthy and Safe Streets
 - Transportation: Build a Next-Generation Transit Network
 - Housing: Protect and Preserve Affordable Housing
 - Housing: Spur Housing Production at All Income Levels
 - Housing: Create Inclusive Communities
 - Economy: Improve Economic Mobility
 - Economy: Shift the Location of Jobs
 - Environment: Reduce Risks from Hazards
 - Environment: Expand Access to Parks and Open Space
 - Environment: Reduce Climate Emissions

Each of the strategies identifies the: 1) anticipated lifecycle cost of this strategy, in year-of-expenditure dollars, regardless of the implementing organization (local, regional, state); 2) primary goal(s); and, description of the strategy; and, a brief description of changes to strategy scope or cost since Draft Blueprint phase (if any). Following is one example of the 35 strategies that will be incorporated into the Draft Plan Bay Area.

If you would like a copy of the 35 strategies, please contact me and/or your ABAG representative on your Council.

Housing: Spur Housing Production at All Income Levels

Strategy H6:
Transform Aging Malls and Office Parks into Neighborhoods

Strategy Cost	<i>not applicable</i>
Strategy Objective	Reinvent 20th century malls and office parks as complete communities with mixed-income housing, local and regional services, and public spaces.
Strategy Description	Permit and promote the reuse of shopping malls and office parks with limited commercial viability as neighborhoods with housing at all income levels, local and regional services, and public spaces. Support projects within Transit-Rich and High Resource Areas that exceed deed-restricted affordable housing requirements by providing technical assistance and low-interest loans. Prioritize a handful of regional pilot projects that add 1,000+ homes and dedicate land for affordable housing and public institutions such as community colleges and university extensions.

Changes Since Draft Blueprint None

- **Growth Geographies:** The job and housing growth in the 9 Bay Area Counties would be focused in the Priority Development Areas, High Resource Areas, Transit-Rich Areas; and, Priority Production Areas.

Growth Geographies would remain largely unchanged from the Draft Blueprint, with minor updates related to PDAs approved in July 2020.

Protect



Areas outside Urban Growth Boundaries (including PCAs)



Unmitigated High Hazard Areas

Prioritize



Priority Development Areas (PDAs)



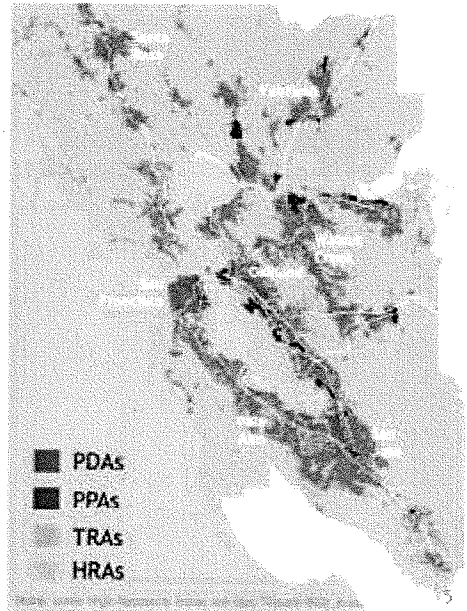
Priority Production Areas (PPAs)



Transit-Rich Areas* (TRAs)
Frequent Regional Rail



Transit-All Other
High-Resource Areas* (HRAs)



* Applies to all jurisdictions except those that have already nominated more than 30% of PDA-eligible areas

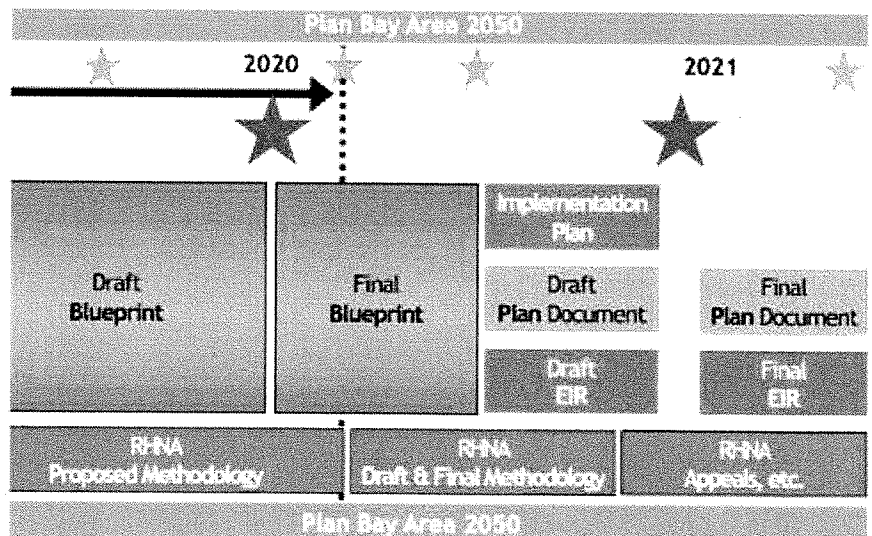
- **Regional Growth Forecast:** The Regional Growth Forecast Methodology was approved by the ABAG Executive Board in September 2019, and since then, staff worked closely with technical experts to develop the nine-county forecasts over the 30-year planning horizon. The Draft Regional Growth Forecast was released in spring 2020, and subsequently revised to integrate the significant adverse effects of the coronavirus pandemic and 2020 recession on the first decade of the planning period. Following is the approved Regional Growth Forecast for Plan Bay Area 2050.

Table 1: Regional Growth Forecast for Plan Bay Area 2050
(Integrating Impacts from COVID-19 Pandemic & 2020 Recession)

Category	2015	2020	2025	2030	2035	2040	2045	2050
Total Population	7,660,000	7,930,000	8,230,000	8,550,000	9,000,000	9,490,000	9,930,000	10,330,000
Total Employment	4,010,000	4,080,000	4,150,000	4,640,000	4,830,000	5,050,000	5,230,000	5,410,000
Total Households	2,680,000	2,760,000	2,950,000	3,210,000	3,500,000	3,710,000	3,890,000	4,040,000
Total Housing Units	2,710,000	2,840,000	3,060,000	3,370,000	3,670,000	3,900,000	4,080,000	4,250,000

ABAG/MTC will issue the notice of preparation of the EIR and develop the alternates to be evaluated in the EIR in October; decide on the preferred alternative in December 2020 and begin developing the Draft Plan Bay Area 2050, Draft EIR and Implementation Plan for release in April 2021 for public comment.

Plan Bay Area 2050 ("Plan") will serve as the region's next-generation plan, ultimately serving as the Regional Transportation Plan and Sustainable Communities Strategy for the San Francisco Bay Area.



ABAG Housing Methodology Committee: The Housing Methodology Committee’s (HMC) objective is to recommend to the ABAG Executive Board an allocation methodology for dividing the Bay Area’s Regional Housing Need Determination (RHND) -- 441,000 housing units -- among the region’s jurisdictions for the next Regional Housing Needs Allocation (RHNA) cycle. The RHNA methodology is a formula that calculates the number of housing units assigned to each city and county, and the formula also distributes each jurisdiction’s housing unit allocation among four affordability levels. The RHNA allocation must meet the five statutory objectives of RHNA and be consistent with the forecasted development pattern from Plan Bay Area 2050.

The Committee membership included an elected official and a staff person from each County along with many stakeholders who are not elected officials. ABAG hired a moderator to manage the meetings and the majority of the group agreed on a voting process.

In October 2019, the Regional Housing Methodology Committee began work and reached consensus on the following principles to guide the development of the RHNA methodology:

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:
 - Equity, as represented by High Opportunity Areas; and
 - 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; and,
5. Housing in high hazard areas is a concern, but RHNA may not be the best tool to address

In building the RHNA Methodology, the Committee considered three primary components:

1. Baseline allocation which is used to assign each jurisdiction a beginning share of the RHND.
2. Income allocation approach which determines how units are allocated by income group to each jurisdiction.
3. Factors and weights which are used to adjust a jurisdiction’s baseline allocation up or down, depending on how a jurisdiction scores on a factor compared to other jurisdictions in the region.

On September 18, 2020, the Committee met for the last time and finalized their recommendation which includes using:

- 2050 Households from the Plan Bay Area Blueprint 2050 as the baseline allocation. With this approach, a jurisdiction’s initial share of the RHND is based on its share of the region’s total households in the year 2050. Using households in 2050 takes into consideration the number of households that are currently living in a jurisdiction as well as the number of households expected to be added over the next several decades. The HMC preferred this option because it captures the benefits of using the Plan Bay Area 2050 Blueprint in the RHNA methodology while also providing a middle ground between using a jurisdiction’s existing households and its expected housing growth from the Plan.
- Bottoms Up income allocation. With this approach, the income allocation methodology is used to identify the number of units for each income category, and the sum of units in the four income categories equals a jurisdiction’s total allocation. With this option, there are two separate variants: a. Bottom-Up with 2-Factor Concept; and, b. Bottom-Up with 3 Factor Concept. See the chart below for an explanation of this option:

Bottom-Up 2-Factor Concept	Bottom-Up 3-Factor Concept
<i>Affordable: Very Low and Low</i> <ul style="list-style-type: none"> • Access to High Opportunity Areas 50% • Jobs-Housing Fit 50% 	<i>Affordable: Very Low and Low</i> <ul style="list-style-type: none"> • Access to High Opportunity Areas 40% • Jobs-Housing Fit 40% • Job Proximity – Transit 20%
<i>Market-Rate: Moderate and Above Moderate</i> <ul style="list-style-type: none"> • Job Proximity – Auto 50% • Jobs-Housing Balance 50% 	<i>Market-Rate: Moderate and Above Moderate</i> <ul style="list-style-type: none"> • Job Proximity – Auto 50% • Job Proximity – Transit 30% • Jobs-Housing Balance 20%

- **Additional Factors and Weights.** After many discussions, the Committee reached consensus to include a factor for an additional emphasis on geographic areas that are designated ‘High Opportunity Areas’ and proximity to jobs. Recently, some of the housing advocates suggested to include an “equity adjustment”. At the September

Option 5A: 50/50 High Opportunity Areas & Jobs	Option 6A: Modified High Opportunity Areas Emphasis	Option 7A: Balanced High Opportunity Areas & Job Proximity	Option 8A: High Opportunity Areas Emphasis & Job Proximity
<p><i>Very Low and Low</i></p> <ul style="list-style-type: none"> • 50% Access to High Opportunity Areas • 50% Jobs-Housing Fit <p><i>Moderate and Above Moderate</i></p> <ul style="list-style-type: none"> • 50% Access to High Opportunity Areas • 50% Job Proximity - Auto 	<p><i>Very Low and Low</i></p> <ul style="list-style-type: none"> • 70% Access to High Opportunity Areas • 30% Jobs-Housing Fit <p><i>Moderate and Above Moderate</i></p> <ul style="list-style-type: none"> • 40% Access to High Opportunity Areas • 60% Job Proximity - Auto 	<p><i>Very Low and Low</i></p> <ul style="list-style-type: none"> • 50% Access to High Opportunity Areas • 25% Job Proximity - Auto • 25% Job Proximity - Transit <p><i>Moderate and Above Moderate</i></p> <ul style="list-style-type: none"> • 50% Access to High Opportunity Areas • 50% Job Proximity - Auto 	<p><i>Very Low and Low</i></p> <ul style="list-style-type: none"> • 70% Access to High Opportunity Areas • 15% Job Proximity - Auto • 15% Job Proximity - Transit <p><i>Moderate and Above Moderate</i></p> <ul style="list-style-type: none"> • 40% Access to High Opportunity Areas • 60% Job Proximity - Auto

18, 2020 meeting of the Housing Methodology Committee there were not enough votes to bring forward the equity adjustment factor. Then, after considerable discussion, the Committee voted for Option 8A. If this option is approved by the ABAG Executive Board, the following chart provides a **rough estimate** of what the next RHNA cycle will be for Marin:

	2050 Households (Blueprint) - Unmodified Allocation				
	VLI	LI	MOD	MOD+	Total
Belvedere	50	30	20	60	160
Corte Madera	210	120	110	270	710
Fairfax	160	90	80	200	530
Larkspur	300	180	150	390	1,020
Mill Valley	250	140	120	320	830
Novato	580	340	330	860	2,110
Ross	40	20	20	40	120
San Anselmo	230	130	110	280	750
San Rafael	750	430	450	1,150	2,780
Sausalito	200	120	120	300	740
Tiburon	190	110	90	240	630
Unincorporated Marin	1,160	670	560	1,440	3,830

This recommendation now goes to the ABAG Regional Planning Committee on October 1, 2020; then, the MTC Planning and ABAG Administrative Committees on October 9, 2020. The final decision will be made by the ABAG Executive Board on October 15, 2020.

There are still some outstanding issues one of which is how the growth associated with the SOI should be distributed? In the past, the growth was assigned to the respective cities’ RHNA allocation rather than the unincorporated county. This issue has not yet been decided.

ABAG/MTC staff has developed a great tool that will show you how the various factors affect our individual RHNA allocation. This tool has been updated to include the recommended factors in assigning the number of housing units by the four income categories. Here is the link: <https://rhna-factors.mtcanalytics.org/>.

UPCOMING MEETINGS²

- **September 21, 2020--** MTC Policy Advisory Committee & Access Subcommittee, 10:05 am
- **September 23, 2020--** MTC Bay Area Infrastructure Financing Authority, 9:05 am
MTC Bay Area Toll Authority, 9:35 am
Metropolitan Transportation Commission, 9:45 am
- **September 25, 2020--** Bay Area Regional Collaborative, 1:05pm
MTC Policy Advisory Council Fare Coordination & Integration Subcommittee, 1:05pm
- **September 28, 2020—** MTC BATA Recovery Ad Hoc Working Group, 1:00 pm
- **October 1, 2020—** ABAG Regional Planning Committee, 1:30 pm
- **October 6, 2020 --** MTC Regional Advisory Working Group, 9:35am
- **October 9, 2020--** MTC Operations Committee, 9:35 am
Joint MTC Planning & ABAG Administrative Committees, 9:40 am
Joint MTC ABAG Legislative Committee, 9:45 am
- **October 14, 2020 –** MTC Bay Area Toll Authority Oversight Committee, 9:35 am
MTC Administration Committee, 9:40 am
MTC Programming and Allocations Committee, 9:45 am
MTC Policy Advisory Council, 1:35pm
- **October 15, 2020—** ABAG Housing Committee, 4:30 pm
ABAG Executive Board, 6:05pm
- **October 26, 2020--** MTC Blue Ribbon Transit Recovery Task Force, 1:05pm
- **October 28, 2020 --** MTC Audit Committee, 9:05 am
MTC Bay Area Toll Authority, 9:35 am
MTC Bay Area Headquarters Authority, 9:40 am
MTC Bay Area Infrastructure Financing Authority, 9:45 am
Metropolitan Transportation Commission, 9:50 am
Joint ABAG MTC Governance Committee, 12:30 pm
- **October 29, 2020 --** ABAG POWER Board of Directors, 11:00 am

If you have questions, contact Pat Eklund, Mayor Pro Tem, City of Novato at 415-883-9116; pateklund@comcast.net.

² All meetings are conducted via Zoom, webcast, teleconference, unless noted otherwise.

TO: Housing Methodology Committee

DATE: October 10, 2019

FR: Deputy Executive Director, Policy

RE: Regional Housing Needs Allocation Overview

What is the Regional Housing Need Allocation (RHNA)?

Since 1969, the State of California has required that all local governments (cities and counties) adequately plan to meet the housing needs of everyone in our communities. To meet this requirement, each city or county must develop a Housing Element as part of its General Plan (the local government's long-range blueprint for growth) that shows how it will meet its community's housing needs. There are many laws that govern this process, and collectively they are known as Housing Element Law.

The Regional Housing Need Allocation (RHNA) process is the part of Housing Element Law used to determine how many new homes, and the affordability of those homes, each local government must plan for in its Housing Element. This process is repeated every eight years, and for this cycle the Bay Area is planning for the period from 2022-2030.

Responsibility for completing RHNA is shared among state, regional, and local governments:

- The **role of the State** is to identify the total number of homes for which each region in California must plan in order to meet the housing needs of people across the full spectrum of income levels, from housing for very low-income households all the way to market rate housing. This is developed by the California Department of Housing and Community Development (HCD) and is known as the Regional Housing Need Determination (RHND).
- The **role of the region** is to allocate a share of the Bay Area's RHND to each city and county in the region. The cities, counties and stakeholders in the Bay Area work together on the methodology for this allocation through the Association of Bay Area Governments (ABAG), the Council of Governments (COG) for the Bay Area.
- The **role of local governments** is to participate in the development of the allocation methodology and to update their Housing Elements and local zoning to show how they will accommodate their share of the RHND.

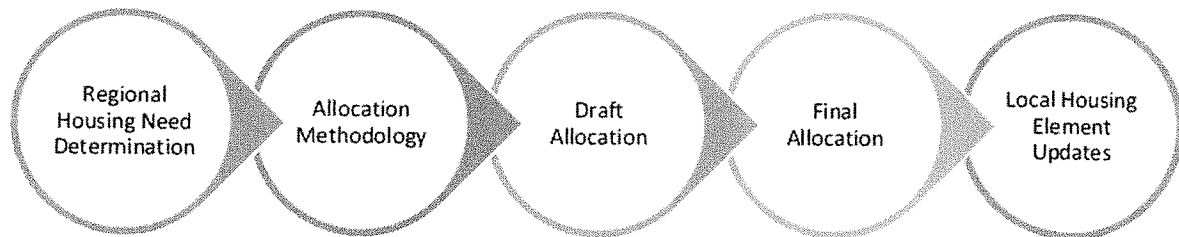
What Principles Guide the RHNA Process?

RHNA and Housing Elements are the primary mechanism by which the State of California requires local governments to take action to meet the housing needs of everyone in the state. Both the RHNA Plan and local Housing Elements must meet five objectives that recognize the importance of comprehensively planning for housing in ways that also promote other priorities, including promoting equity, strengthening the economy, protecting the environment, and promoting public health and safety in the state.

The RHNA objectives can be summarized as:

- Increase housing supply and mix of housing types, tenure, and affordability in all cities and counties within the region in an equitable manner.
- Promote infill development (homes in already-developed areas) and socioeconomic equity, protect environmental and agricultural resources, encourage efficient development patterns (such as putting jobs close to housing), and achieve greenhouse gas reduction targets.
- Promote a thoughtful distribution of jobs and housing region-wide, including an improved balance between low-wage jobs and the number of affordable housing in each jurisdiction.
- Balance disproportionate household income distributions by allocating more market rate homes to lower-income areas and more low-income and very low-income homes in opportunity-rich areas.
- Affirmatively further fair housing, by taking actions to overcome patterns of segregation and foster inclusive communities that provide universal access to opportunity, regardless of a person's race, color, sex, family status, national origin, or disability. Although RHNA is based on the principle that every community should do its "fair share" to provide homes for people at all income levels, the addition of this new objective makes this concept more explicit.

Conceptual Overview of the RHNA Process



Housing Element Law outlines the detailed steps required for completing RHNA, including many opportunities for stakeholders and members of the public to provide input into the process. Conceptually the key milestones in the process are:

Regional Housing Need Determination: As noted above, HCD will identify the total number of housing units, by income category, for which the Bay Area must plan for 2022 to 2030. ABAG consults with HCD about the need determination, but Housing Element law was recently changed to be more prescriptive about how HCD determines the region's housing need.

To ensure the RHND accounts for unmet existing housing need, in addition to the housing needs projected for 2022-2030, HCD must include information about overcrowded households,

households that are cost-burdened, and a target vacancy rate for a healthy housing market when identifying the RHND. These changes are likely to result in a higher RHND for the Bay Area than those the region has received in past cycles.

Allocation Methodology: The allocation methodology is a formula that divvies up the Bay Area’s RHND and calculates the number of housing units and the affordability levels of those units that will be assigned to each city and county to accommodate in its Housing Element. In an effort to incorporate diverse perspectives in determining an equitable distribution of the needed housing to each local government, ABAG convenes a Housing Methodology Committee (HMC) comprised of local government elected officials, staff, and stakeholders from throughout the region to advise ABAG in developing the allocation methodology.

The foundation for this formula is the pattern of expected growth in population, households and jobs from the region’s long-range plan, *Plan Bay Area 2050*. Members of the HMC will work collaboratively to build a numerical formula for allocating housing need by selecting “factors” that adjust the underlying growth pattern from *Plan Bay Area 2050*. The factors chosen by the HMC will use data for each city or county in the region about the selected topic or principle.

The HMC must consider 14 different factors from Housing Element Law, as well as other potential factors identified by the committee, for inclusion in the methodology to allocate housing need in a way that achieves the five RHNA objectives. The Housing Element Law factors can be summarized as:

<ol style="list-style-type: none"> 1. Existing and projected jobs and housing relationship, <i>particularly low-wage jobs and affordable housing</i> 2. Lack of capacity for sewer or water service due to decisions outside jurisdiction’s control 3. Availability of land suitable for urban development 4. Lands protected from urban development under existing federal or state programs 5. County policies to preserve prime agricultural land 6. Distribution of household growth in <i>Plan Bay Area 2050</i> and opportunities to maximize use of transit and existing transportation infrastructure 	<ol style="list-style-type: none"> 7. Agreements to direct growth toward incorporated areas 8. Loss of deed-restricted affordable units <i>9. Households paying more than 30 percent and more than 50 percent of their income in rent</i> <i>10. The rate of overcrowding</i> 11. Housing needs of farmworkers 12. Housing needs generated by a university within the jurisdiction <i>13. Units lost during a state of emergency that have yet to be replaced</i> <i>14. The region’s GHG targets</i>
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* *Italicized text indicates new factors added for this, the sixth cycle of RHNA.*

Members of the HMC are asked to work together to select the best mix of factors that would result in an equitable distribution of housing need throughout the region. Committee members will have to grapple with determining what is “equitable” and finding the right balance in

achieving each of the RHNA objectives, which can sometimes appear to be at odds with one another. The HMC is responsible for advising staff on a methodology for allocating the entire RHND, and figuring out how to balance the needs of jurisdictions with the needs of the region is the challenge of each RHNA cycle. The final allocation must also be consistent with the development pattern in *Plan Bay Area 2050*.

ABAG staff will share information about the HMC's deliberations and recommendations with the ABAG Regional Planning Committee (RPC). Serving as the primary committee for the working group to interact with, the RPC will then use the input from the HMC to make recommendations to the ABAG Executive Board, which has the authority to make final decisions. ABAG is required to issue a proposed methodology for public comment and then develop a draft methodology to send to HCD for its review prior to adopting a final methodology.

Draft and Final Allocation: Once the final methodology is adopted, ABAG issues a draft allocation to local governments—this is the number of units at each income level that each city and county must show they have the capacity to build. Following the draft allocation, a local government or HCD can appeal the allocation to a particular jurisdiction by making a case that the allocation does not further the RHNA objectives. An appeal of a jurisdiction's allocation does not reduce the RHND for the region. If an appeal is upheld, affected units would be redistributed to others in the region. After ABAG takes action on the appeals, it then issues the final allocation.

Local Housing Element Updates: Each local government must then revise the Housing Element of its General Plan to show it has zoned sufficient sites at densities that will allow it to accommodate its portion of the region's housing need. The Housing Element also identifies policies and strategies the local government will undertake to support housing development and to meet the housing needs of its residents. Similar to the RHNA Plan, each community's Housing Element must affirmatively further fair housing. ABAG's formal role within RHNA ends with adoption of the final allocation—it does not have a say in the approval of local jurisdictions' Housing Elements, which are approved by State HCD. However, ABAG has traditionally provided data and other support to jurisdictions as they develop their Housing Elements.

How Do Subregions Play a Role in the RHNA Process?

RHNA law allows neighboring jurisdictions to form a subregion to conduct a separate but parallel RHNA process. A subregion accepts responsibility for undertaking all of the mandatory steps for completing the RHNA allocations for its member jurisdictions. Forming a subregion allows local governments to work collaboratively toward allocations that are more tailored to the local context. Bay Area jurisdictions have until early 2020 to decide to form a subregion. The HMC will provide feedback on the methodology for determining the subregion's share of the Bay Area RHND. The subregion's portion of the RHND will be removed from the region's allocation process. Although a subregion might choose to use the region's allocation methodology as a reference, the subregion will create its own allocation methodology and issue its own RHNA allocations.