



Forming a County Sub-Region for RHNA

6

Purpose and Process of C/CAG Review

- **Process New Information.** Review information (State law changes) related to the jurisdictions in San Mateo County undertaking a sub-RHNA process.
- **Discuss the Pros and Cons.** Discuss the pros and cons of forming a sub-region.
- **Identify Questions and Need for Information.** Questions of clarification and other information needed.
- **Make a Decision on Forming a Sub-RHNA.** Decide whether to form a sub-region RHNA at the C/CAG Board meeting in September.

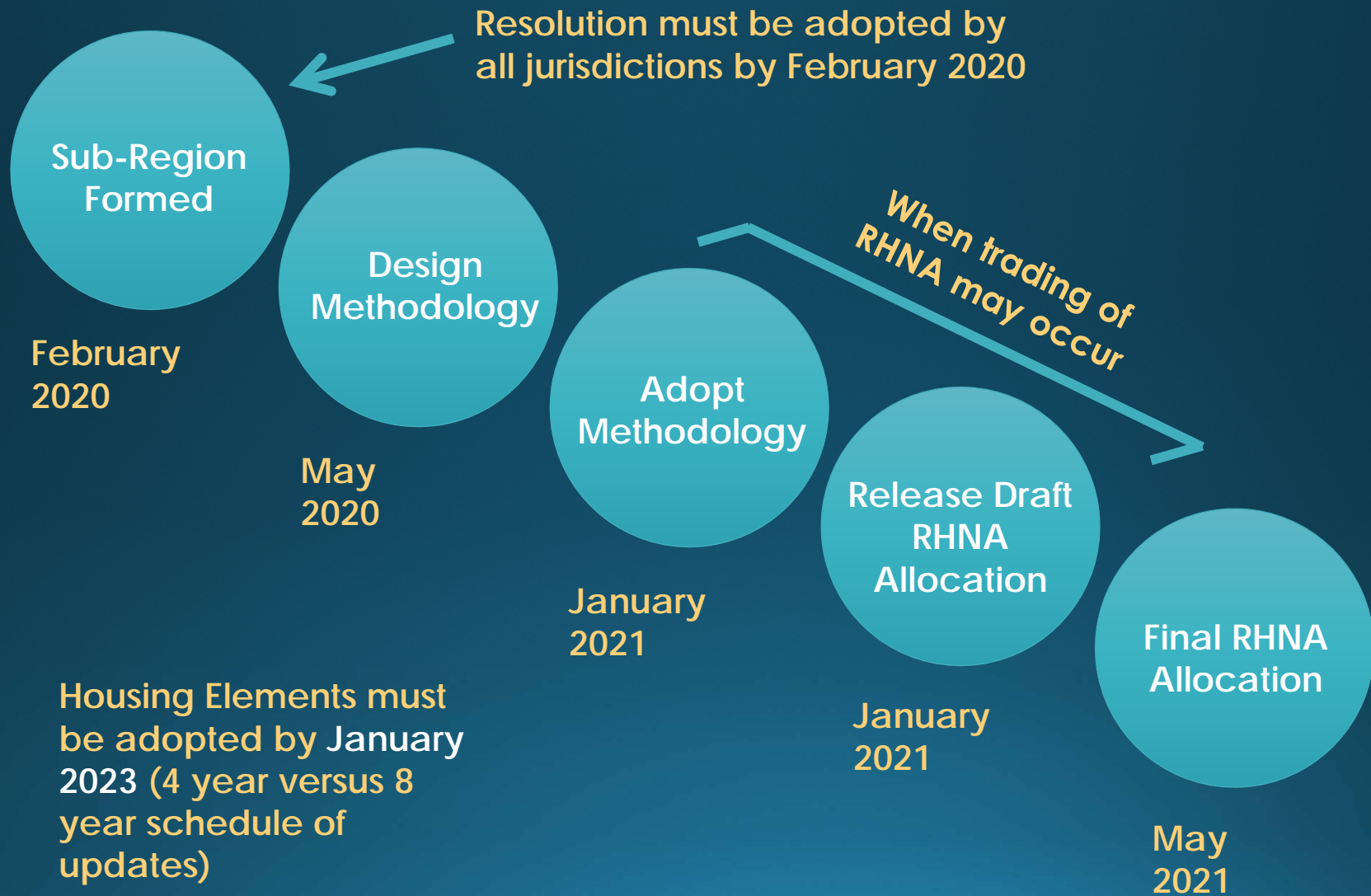
How the Sub-RHNA Works

- **What is RHNA?** A jurisdiction's RHNA (regional housing needs allocation — total and by income category) defines jurisdiction capacity for providing adequate housing sites. ABAG would normally determine a jurisdiction's RHNA.
- **Total Sub-Region RHNA Number.** Determined by ABAG (HCD). RHNA 6 (plus 20-25%). The Sub-region develops a methodology to distribute.
- **Housing Element Sites and Programs.** Housing Element sites must address RHNA.
- **Trading of RHNA.** Right now, can only occur as part of the Sub-RHNA process.

Some Key Things About Sub-RHNA

- **Schedule.** Sub-regions formed by February 2020. Significant work May 2020 – April 2021.
- **Participation.** Not all jurisdictions must participate — BUT — must be contiguous and must include the unincorporated County.
- **Methodology and RHNA Trading.** Methodology must further state objectives (trading RHNA would be part of finalizing the methodology) — PLUS — compliance with furthering fair housing must be considered.
- **Opt-Back Option.** Jurisdictions may opt back into the ABAG process at any time.

How the Sub-RHNA Works



History of the San Mateo County Sub-RHNA

- **RHNA 4 (2007)**. All 21 jurisdictions. Methodology shifted 3% of the units countywide (6 jurisdictions ended up with a lower RHNA and 3 with higher RHNA). Collaboration resulted in formation of 21 Elements (later Home for All).
- **RHNA 5 (2012)**. All 21 jurisdictions. Methodology shifted 5% of the units countywide (9 jurisdictions ended up with a lower RHNA and 5 with higher RHNA). Trades involving (1) Colma/Daly City/San Mateo County and (2) Woodside/Redwood City.
- **RHNA 6 (now)**. See changes.

What Has Changed for RHNA 6?

- **Fewer Housing Element Sites Can Be Counted.** State law changes — (1) increased scrutiny of small, large and non-vacant sites; (2) new limits on reusing sites; and (3) definition of vacant sites is getting much more strict.
- **RHNA Increase.** Local RHNA's are anticipated to increase by 20-25% over previous allocations.
- **Much More Strict Methodology.** The methodology requirements are more strict and it must further state objectives (trading RHNA would be part of finalizing the methodology) — PLUS — compliance with furthering fair housing must be considered.

Previous Housing Sites Facing Increased Scrutiny and Limitations on Lower Income Sites

(Large sites over 10 acres also face greater scrutiny but there are none in San Mateo County)

City	Vacant Sites	Non-Vacant Sites	Small Sites	Large Sites
Atherton	No	Yes	No	No
Belmont	Yes	Yes	Yes	No
Brisbane	Yes	Yes	Yes	No
Burlingame	No	Yes	Yes	No
Colma	No	Yes	No	No
Daly City	Yes	Yes	Yes	No
East Palo Alto	No	Yes	Yes	No
Foster City	No	Yes	Yes	No
Half Moon Bay	Yes	Yes	Yes	No
Hillsborough	Yes	Yes	Yes	No
Menlo Park	Yes	Yes	Yes	No
Millbrae	No	Yes	Yes	No
Pacifica	No	Yes	Yes	No
Portola Valley	No	Yes	No	No
Redwood City	Yes	Yes	Yes	No
San Bruno	No	Yes	No	No
San Carlos	No	Yes	Yes	No
San Mateo	No	Yes	Yes	No
South San Francisco	Yes	Yes	Yes	No
Woodside	Yes	Yes	Yes	No

Source: 21 Elements (December 2018)

Possible List of the Pros and Cons of Forming a Sub-Region RHNA

Potential Benefits

- Build on past successes and history of working together on housing (we now have 21 Elements, C/CAG and Home for All)
- Public perception of local control over a state mandate (even if minimal)
- Share knowledge and messaging
- Possible trading (unsure)

Challenges/Drawbacks

- More rigid and rigorous standards and analysis needed
- Significant time and effort (staff and 21 Elements time required)
- RHNA anticipated to be 20-25% higher
- Limited (if any) opportunity to trade RHNA
- Land use changes may be needed as well

- ❑ **Questions of Clarification**
- ❑ **Requests for Additional Information**
- ❑ **Discussion and Other**

**Reminder — follow-up discussion
and decision at the C/CAG Board
meeting in September**