

AFFH & the RHNA Allocation Process

This is an overview of how COGs have approached affirmatively furthering fair housing (AFFH) during the 6th cycle RHNA allocation process.

In 2018, AB 1771 amended Housing Element Law to require that COGs develop allocation methodologies to distribute RHNA among jurisdictions that AFFH. AB 1771 also gave HCD the authority to reivev RHNA allocation methodologies and determine whether they do further the statutory objectives.

During the 6th RHNA cycle, COGs have generally followed a similar strategy for promoting AFFH in the RHNA allocation methodology. For instance, most regions have incorporated the TCAC/HCD Opportunity Map so as to allocate more RHNA to higher resource areas.

Examples:

ABAG

ABAG developed a baseline allocation based on each jurisdiction's share of the region's total households in the Plan Bay Area 2050 Blueprint. ABAG then adjusted the baseline allocation based on three factors: access to high opportunity areas, job proximity via auto, and job proximity via transit. Lastly, ABAG applied an equity adjustment that ensured that affluent jurisdictions that were racially concentrated received a share of the lower income RHNA that was proportional to their share of households.

KCAG

KCAG developed a baseline allocation based on three weighted factors: projected housing growth in the RTP/SCS (40%), projected employment growth in the RTP/SCS (40%), and access to opportunity based on the TCAC/HCD Opportunity Map (20%). KCAG then applied an adjustment that increased the RHNA allocation in areas with low vacancy rates. Lastly, KCAG applied an income shift adjustment that allocated more lower income RHNA to higher income areas and vice versa.