



Planning Directors Forum

Thursday, February 25, 2021

10:00 – 11:30 a.m.

Go To Webinar

AGENDA

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1. **Welcome/Roll Call (5 mins)**
2. **2045 Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS) Update (Heather Adamson, AMBAG) (10 mins)**

AMBAG staff will provide an update on the development of the 2045 MTP/SCS.
3. **Transportation Analysis Zones (TAZ) Disaggregation Update (Gina Schmidt, AMBAG) (10 mins)**

AMBAG staff will provide an update on the TAZ disaggregation process.
4. **6th Cycle Regional Housing Needs Assessment (RHNA) Timeline and New Requirements (Heather Adamson, AMBAG) (20 mins)**

AMBAG staff will provide an overview of the schedule and new requirements for the 6th Cycle RHNA.
5. **2021 Title VI Plan Development Process (Miranda Taylor, AMBAG) (10 mins)**

AMBAG staff will provide an update on the development process for the 2021 Title VI Plan.
6. **Tribal/Cultural Resources Monitoring Efforts from other Jurisdictions (AB 52 and SB 18) (Doreen Liberto Blanck, King City) (10 mins)**
7. **Next Steps/Adjourn**

Staff Contact

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MEMORANDUM

TO: AMBAG Planning Directors Forum

FROM: Heather Adamson, Director of Planning

SUBJECT: 2045 Metropolitan Transportation Plan/Sustainable Communities Strategy Update

MEETING DATE: February 25, 2021

RECOMMENDATION: INFORMATION

Receive an update on the development of the 2045 Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS).

BACKGROUND/DISCUSSION:

AMBAG adopted the 2040 Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS) in June 2018. Federal and state law requires that AMBAG prepare a long-range transportation plan for the tri-county region. In accordance with state and federal guidelines, the 2045 MTP/SCS is scheduled for adoption by the Board of Directors in June 2022. The 2045 MTP/SCS activities underway are highlighted below.

Land Use Inputs and Mapping Updates

AMBAG staff is working with local jurisdictions to update current and future land uses which will be presented in the PlaceType and Opportunity Area maps for the SCS. Accurate identification of land uses and opportunity areas is important to forecasting and planning for future transportation improvements. The PlaceType maps depict the various existing and future land use designations for each local jurisdiction.

Beginning in March 2021, AMBAG will also work with local jurisdiction planning staff to update the Opportunity Area (OA) maps for the SCS. Opportunity Areas are places in the region with the highest chance for successful sustainable growth in the future; they are generally located where supportive land use densities, high quality transit service and economic development areas within the AMBAG region overlap.

Planning Excellence!

Transportation Project List

AMBAG is working with our transportation partners to update the transportation project list that will be included in the 2045 MTP/SCS. All projects that will use federal or state funds must be included in the 2045 MTP/SCS project list. The Council of San Benito County of Governments (SBtCOG), Santa Cruz County Regional Transportation Commission (SCCRTC) and Transportation Agency for Monterey County (TAMC), are working with local jurisdiction staff and transit operators to update their local and regional transportation project and program information. The RPTAs will be submitting their approved project lists at the end of February 2021 to be included in the draft 2045 MTP/SCS.

Revenue Assumptions

AMBAG has been working with our transportation partners to develop financial assumptions for the MTP/SCS through 2045. The financial assumptions will guide how much local, state and federal funding will be reasonably available for the transportation investments included in the 2045 MTP/SCS. Preliminary revenues are shown below. The breakdown of draft revenues accounts for 15% federal funds, 34% state funds and 51% local funds.

Draft 2045 MTP/SCS Transportation Revenues (2020 \$, in billions)

County	Draft Revenues
Monterey	\$6.7
San Benito	\$1.5
Santa Cruz	\$5.0
Total AMBAG Region	\$13.2

Scenario Planning

The purpose of scenario planning is to identify future land use and transportation planning options for the AMBAG region over the next 20+ years. AMBAG is developing transportation/land use scenarios for evaluation in the MTP/SCS and Environmental Impact Report (EIR). The various planning scenarios to be evaluated will be framed by MTP/SCS goals and policies and will cover a range of alternatives and themes such as no improvements, livable communities and maintaining mobility and making the best use of our resources, including the following:

- Supportive land uses around transit investments

- Provide alternative travel options (transit, bicycle, pedestrian, etc.) to driving alone
- Make transportation investments to improve congestion and safety around the region

Over the next few months, scenarios will be refined and evaluated and will include various land uses and transportation investments. In spring 2021, the Board of Directors will be asked to select a preferred land use and transportation scenario, also known as the Preferred Revenue Constrained Scenario which will become the basis of the 2045 MTP/SCS and its EIR.

Programmatic Environmental Impact Report

Work on the programmatic EIR is underway and will serve as the EIR for the 2045 MTP/SCS as well as the EIR for each of the RTPA's county-level Regional Transportation Plan (RTPs). AMBAG and the RTPAs coordinate on the EIR to reduce duplication of efforts for environmental documentation, for budgetary efficiency and to assure consistency in environmental review between plans. AMBAG is the lead for developing the programmatic EIR, working with the RTPAs, an environmental consulting firm and an environmental legal firm to develop the joint EIR. The draft EIR is scheduled to be released for public comment in late 2021.

2045 MTP/SCS Public Involvement Program

AMBAG staff will continue to implement the outreach strategies included in the Public Involvement Plan and we expect to have public workshops in spring 2021 on the development of the MTP/SCS.

Next Steps

Staff will continue to develop the various components of the 2045 MTP/SCS working with the Planning Directors Forum, Technical Advisory Committees, partner agencies and key stakeholders.



MEMORANDUM

TO: Planning Directors Forum

FROM: Paul Hierling, AMBAG

SUBJECT: 6th Cycle RHNA Overview and Schedule

MEETING DATE: February 25, 2021

RECOMMENDATION: INFORMATION

Receive a presentation on the regional housing needs allocation (RHNA) schedule and process.

BACKGROUND/DISCUSSION:

California State Housing Element Law enacted in 1980 requires AMBAG, acting in the capacity of Council of Governments (COG), to develop a methodology for distributing existing and projected housing need to local jurisdictions in Monterey and Santa Cruz Counties. Housing law also sets forth a process, schedule, objectives and factors to use in the RHNA methodology. The methodology must address allocation of housing units by jurisdiction, housing units by income group, and must address 12 housing-related factors and five statutory objectives. The Council of San Benito County Governments performs this same function for San Benito County.

AMBAG is currently entering the planning phase for the 2023-2031 RHNA period. As there have been five previous housing element update cycles, this round is also known as the 6th Cycle RHNA. The 6th Cycle of RHNA is different from previous rounds in that it significantly increases the amount of housing a region must plan for due to recent legislative changes found in SB 828 (2018), AB 1771 (2018), and AB 686 (2018) which altered HCD RHNA determinations as follows:

- Adjusts RHNA up by setting a target “healthy” vacancy rate of no less than 5%;
- Adjusts RHNA up by redistributing overcrowding into housing units;
- Allows HCD to adjust RHNA upwards based on comparing the difference in cost-burden by income group for the region to the cost burden by income group for comparable regions, and adjusting the very-low and low income housing need upwards accordingly;

- Prohibits the use of previous underproduction of housing or stable population growth to reduce housing development goals;
- Requires RHNA methodologies to promote fair housing, and reduce income and racial segregation when allocating housing of various income types.

As this cycle of RHNA has changed significantly from previous rounds, this item does not include a summary of AMBAG's 5th Cycle RHNA Plan. For information on AMBAG's previous 5th Cycle 2014-2023 RHNA plan, see this [link](#).

RHNA is a projection of additional housing units needed to accommodate projected household growth of all income levels from the start until the end date of the projection period. RHNA is not a prediction of building permits, construction, or housing activity, nor is it limited due to existing land use capacity or growth. A community is not obligated to provide housing to all in need. RHNA is a distribution of housing development capacity that each city and county must zone for in a planning period and is not a construction need allocation.

This item presents background information relevant to the RHNA process, including the statutory RHNA process and schedule, the statutory objectives and factors the RHNA methodology must consider, and an attachment discussing 6th Cycle RHNA allocation methodologies used by other COGs.

RHNA Process and Schedule

As part of the RHNA process, State law (Government Code 65584 et seq.) requires AMBAG to determine each local jurisdiction's share of the region's future housing need. The RHNA produces regional, subregional and local targets for the amount and type of housing needed over the planning period. In Spring/Summer 2021, AMBAG will begin consulting with the California Department of Housing and Community Development (HCD) and the Department of Finance (DOF) regarding the total regional housing need. Once the consultation period ends, AMBAG will receive a 2023-2031 regional housing need determination from HCD in late summer 2021. HCD is responsible for determining the regional housing needs total, segmented by income levels, for each of the state's COGs. HCD bases their RHNA determinations on population forecasts from DOF. HCD then applies a formula to determine final housing needs which includes converting the population forecast to household (housing) demand using household formation rates, and applying statutorily required adjustments upwards to take into consideration housing need for low vacancy rates, overcrowding, demolitions and housing cost burdens.

Once HCD and AMBAG have agreed to the two-county total housing need, AMBAG is responsible for developing a method to allocate the housing need amongst all of the jurisdictions within the COG region. Throughout this process, the Planning Directors Forum representatives from member jurisdictions in Monterey and Santa Cruz Counties

will act as a working group to assist in the development of the 2023-2031 RHNA methodology and plan, similar to what was established for the 2014-2023 RHNA Plan. AMBAG will concurrently consult with the AMBAG Board on the HCD allocation and potential methodological approaches.

Following adoption of the RHNA plan and approval of that plan by State HCD, the local jurisdictions in Monterey and Santa Cruz Counties must update their housing elements as necessary to accommodate the regional housing allocations by assuring that adequate sites and zoning capacity are available to accommodate at least the number of units allocated. The housing elements are reviewed for approval by HCD. In some cases, funding from state/federal housing programs can only be accessed if the jurisdiction has a compliant housing element. Other fiscal penalties can be applied by the state for having a non-compliant housing element.

Additional detail on the proposed RHNA schedule is listed in Figure 1 below. These dates are based on the MTP/SCS adoption date, and statutory requirements and deadlines provided by HCD.

Figure 1: Tentative RHNA Schedule

TARGET SCHEDULE	TASK
Spring/Summer 2021	AMBAG staff begins early consultation with HCD on 6th Cycle RHNA determination
Spring/Summer 2021	Discussions with PDF on potential RHNA methodology options and factors
Late Summer 2021	6th Cycle RHNA Determination expected from HCD
Spring-Winter 2021	Potential RHNA methodology options discussed by AMBAG Board
November 2021	Selection of proposed RHNA methodology by AMBAG Board
November 2021 - January 2022	HCD Reviews Draft Methodology
January 2022	Approval of final RHNA methodology by AMBAG Board
January 2022	Release draft RHNA plan with RHNA allocations by jurisdiction
May 2022	AMBAG releases final MTP/SCS accommodating RHNA
June 2022	Adoption of final RHNA plan with RHNA allocations by AMBAG Board
December 2023	Jurisdiction’s 6th Cycle Housing Elements are due to HCD

This schedule may be extended for up to a few months depending on if appeals are received by AMBAG.

Statutory Objectives and Factors for RHNA Methodology

State statute requires AMBAG to consider or further a series of five objectives and 12 factors, many of which have been newly amended by state legislation since 2018 (see

Attachment 1). The following five objectives must be considered during the development of the methodology to allocate housing needs in the region:

1. Increase Housing Supply and Mix of Housing Types
2. Promote Infill, Equity, and Environment
3. Ensure Jobs Housing Balance and Fit
4. Promote Regional Income Parity
5. Affirmatively Further Fair Housing

The RHNA objectives provide the guiding framework for how AMBAG must develop the methodology. AMBAG is required to demonstrate how its methodology furthers each of the objectives. This requires proactive inclusion of each objective into the analysis and represents a higher standard than in previous cycles, which required allocation methodologies only to be generally consistent with state objectives.

In order for the RHNA methodology to be approved, HCD must make a determination on whether it meets these five objectives and is consistent with RHNA statutes. If any objective is not adequately addressed, the methodology must be revised and resubmitted until HCD determines the methodology meets all RHNA objectives. The AMBAG Board cannot approve a methodology and the draft RHNA allocation cannot be produced until HCD has approved the RHNA methodology.

In addition, there are 12 RHNA factors that AMBAG must consider when distributing each jurisdiction's overall and income category allocations. State law mandates that the RHNA factors be incorporated into the methodology to the extent that sufficient data is available.

1. Jobs and Housing Relationship
2. Opportunities and constraints to development of additional housing, including capacity for sewer and water service, availability of land suitable for development, lands preserved or protected from development, and county policies to preserve prime agricultural land.
3. Opportunities to maximize transit and existing transportation infrastructure
4. Policies directing growth toward incorporated areas
5. Loss of units contained in assisted housing developments
6. High housing cost burdens
7. Rate of Overcrowding
8. Housing needs of farmworkers
9. Housing needs of UC and Cal State students
10. Loss of units during an emergency
11. SB 375 Greenhouse Gas Reduction Targets
12. Other factors adopted by Council of Governments (COGs)

AMBAG is required to survey each of the member jurisdictions to request information regarding the factors listed above (per Gov. Code Section 65584.04(b)(1)). AMBAG staff will be distributing a survey form to each member jurisdiction requesting this information in late spring 2021.

Allocation Methodologies Used by Other Councils of Government

In preparation for the 2023-2031 RHNA planning period, staff has also reviewed allocation methodologies used by other COGs. In all cases, each region's RHNA allocation increased significantly compared to their 5th Cycle RHNA. These other allocation methodologies are informative and give a sense of the wide variety of possible approaches to allocating the RHNA. The RHNA allocation methodologies reviewed include a range of approaches, including considerations for proximity to job opportunities, fair housing issues, transit proximity, and income levels. In most cases, the Council of Governments' adopted growth forecasts are used as a starting point in the RHNA process, with additional adjustments made as necessary.

The following RHNA Plans are summarized in Attachment 2:

- Southern California Association of Governments
- Sacramento Area Council of Governments
- San Diego Association of Governments
- Association of Bay Area Governments
- Santa Barbara County Association of Governments
- Butte County Association of Governments

These approaches will be evaluated further once HCD determines the AMBAG COG region's housing need and AMBAG begins developing a methodology for allocation.

RHNA and Metropolitan Transportation Plan/Sustainable Communities Strategy Coordination

RHNA follows an eight-year cycle and will be integrated with every other MTP update (since the MTP is updated every four years). SB 375 requires the MTP/SCS to "identify areas within the region sufficient to house an eight-year projection of the regional housing need for the region." Government Code § 65080(b)(2)(B)(iii). AMBAG staff will work with the PDF and member jurisdictions to develop and adopt a methodology for allocating the regional housing need in concert with the development of the MTP/SCS, so that the MTP/SCS accommodates the regional housing need and is consistent with its allocation at both the regional and local levels.

Next Steps

As AMBAG proceeds through the RHNA planning process, further items will be brought to this group for consideration, discussion and input.

ATTACHMENTS:

1. Regional Housing Needs Allocation Objectives and Factors
2. Allocation Methodologies Used by Other Councils of Government

REGIONAL HOUSING NEEDS ALLOCATION OBJECTIVES AND FACTORS (§65584.04.E)

This section describes the Regional Housing Needs Allocation (RHNA) objectives and factors identified in state statute which AMBAG must consider. Objectives must be met in all RHNA methodologies. Factors must be considered to the extent sufficient data is available when developing its RHNA methodology.

RHNA Plan Objectives, Government Code 65584(d)

The regional housing needs allocation plan shall further all of the following objectives:

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 each jurisdiction receiving an allocation of units for low- and very-low-income households.
2. Promoting infill development and socioeconomic equity, the protection of environmental and agricultural resources, the encouragement of efficient development patterns, and the achievement of the region's greenhouse gas reductions targets provided by the State Air Resources Board pursuant to Section 65080.
3. Promoting an improved intraregional relationship between jobs and housing, including an improved balance between the number of low-wage jobs and the number of housing units affordable to low-wage workers in each jurisdiction.
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 American Community Survey.
5. Affirmatively furthering fair housing.

RHNA Plan Factors, Government Code 65584(e)

1. Jobs and Housing Relationship

"Each member jurisdiction's existing and projected jobs and housing relationship. This shall include an estimate based on readily available data on the number of low-wage jobs within the jurisdiction and how many housing units within the jurisdiction are affordable to low-wage workers as well as an estimate based on readily available data, of projected job growth and projected household growth by income level within each member jurisdiction during the planning period." - §65584.04(e)

2. Opportunities and constraints to development of additional housing (see below)

2a. Capacity for sewer and water service

"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." - §65584.04(e)

2b. Availability of land suitable for urban development

"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. The determination of available land suitable for urban development may exclude lands where the Federal Emergency Management Agency (FEMA) or the Department of Water Resources has determined that the flood management infrastructure designed to protect that land is not adequate to avoid the risk of flooding." - §65584.04(e)

2c. Lands preserved or protected from urban development

"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, including land zoned or designated for agricultural protection or preservation that is subject to a local ballot measure that was approved by the voters of that jurisdiction that prohibits or restricts conversion to non-agricultural uses." - §65584.04(e)

2d. County policies to preserve prime agricultural land

"County policies to preserve prime agricultural land, as defined pursuant to Section 56064, within an unincorporated and land within an unincorporated area zoned or designated for agricultural protection or preservation that is subject to a local ballot measure that was approved by the voters of that jurisdiction that prohibits or restricts its conversion to non-agricultural uses." - §65584.04(e)

3. Opportunities to maximize transit and existing transportation infrastructure

"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." - §65584.04(e)

4. Policies directing growth toward incorporated areas

"Agreements between a county and cities in a county to direct growth toward incorporated areas of the county and land within an unincorporated area zoned or designated for agricultural protection or preservation that is subject to a local ballot measure that was approved by the voters of the jurisdiction that prohibits or restricts conversion to non-agricultural uses." - §65584.04(e)

5. Loss of units contained in assisted housing developments

"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." - §65584.04(e)

6. High housing cost burdens

"The percentage of existing households at each of the income levels listed in subdivision (e) of Section 65584 that are paying more than 30 percent and more than 50 percent of their income in rent."

7. Rate of Overcrowding

Factor undefined. - §65584.04(e)

8. Housing needs of farmworkers

Factor undefined. - §65584.04(e)

9. Housing needs of UC and Cal State students

"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." - §65584.04(e)

10. Loss of units during an emergency

"The loss of units during a state of emergency that was declared by the Governor pursuant to the California Emergency Services Act (Chapter 7 (commencing with Section 8550) of Division 1 of Title 2), during the planning period immediately preceding the

relevant revision pursuant to Section 65588 that have yet to be rebuilt or replaced at the time of the analysis." - §65584.04(e)

11. SB 375 Greenhouse Gas Reduction Targets

"The region's greenhouse gas emissions targets provided by the State Air Resources Board pursuant to Section 65080." - §65584.04(e)

12. Other factors adopted by Council of Governments

"Any other factors adopted by the council of governments, that further the objectives listed in subdivision (d) of Section 65584, provided that the council of governments specifies which of the objectives each additional factor is necessary to further. The council of governments may include additional factors unrelated to furthering the objectives listed in subdivision (d) of Section 65584 so long as the additional factors do not undermine the objectives listed in subdivision (d) of Section 65584 and are applied equally across all household income levels as described in subdivision (f) of Section 65584 and the council of governments makes a finding that the factor is necessary to address significant health and safety conditions." - §65584.04(e)

ALLOCATION METHODOLOGIES USED BY OTHER COUNCILS OF GOVERNMENT

Introduction

To inform AMBAG’s methodology, AMBAG staff has reviewed 6th Cycle RHNA allocation methodologies used by other COGs. These other allocation methodologies give a sense of the variety of possible approaches to allocating the RHNA. The RHNA allocation methodologies reviewed include a range of approaches, from simplified allocations using only the household or population growth in adopted growth forecasts to more involved allocations incorporating existing or forecasted jobs, and adjustments for very low and low income levels. In most cases, the COG’s adopted growth forecasts are used as a starting point in the RHNA process, with additional adjustments made as necessary. Starting the RHNA allocation process with a base determined by the regional growth forecast establishes a foundational allocation that recognizes the significant capacity differences between jurisdictions and provides for an allocation that is suitable for each jurisdiction’s existing size.

The following RHNA allocation processes are summarized below:

- Southern California Association of Governments
- Sacramento Area Council of Governments
- San Diego Association of Governments
- Association of Bay Area Governments
- Santa Barbara County Association of Governments
- Butte County Association of Governments

Southern California Association of Governments (SCAG)

SCAG’s 5th Cycle of RHNA determined a need for 412,137 units for the 6.8-year period of 2014 through 2021. For the current 6th Cycle, the determination of 1,341,827 housing units for the SCAG region has been proposed and adopted for the 8.25-year projection period of 2021 through 2029. SCGA’s allocation increased by 225 percent between the 5th and 6th RHNA cycle. Compared to the prior 5th Cycle, SCAG’s large increase is primarily attributed to the growth that the region has projected for 2020-2030.

The SCAG 6th Cycle methodology includes the following steps:

1. Assumed expected housing growth according to the regional growth forecast accommodates a portion of the RHNA housing need

2. Increase projected housing need based on a healthier vacancy rate, redistributing overcrowding to housing units, and replacement of any lost units due to events such as disasters
3. Allocate remaining housing need based on HCD RHNA determination: 50% in high quality transit area, 50% in high jobs accessibility zones
4. Redistribute a portion of housing assigned to extremely disadvantaged communities (per HCD Opportunity Indices) to non-disadvantaged areas with proximity to high quality transit and high jobs accessibility zones (50/50).
5. Apply a social equity adjustment to assure that housing for the different income categories (very low, low, moderate, above moderate) is distributed more evenly, assigning more lower and moderate income housing to jurisdictions with less of those income category housing types.
6. Applied an AFFH factor to place more affordable housing in high resource zones per HCD Opportunity Indices.

Sacramento Area Council of Governments (SACOG)

SACOG's 5th Cycle of RHNA determined a need for 104,970 units for the 7.6-year period of 2013 through 2021. For the current 6th Cycle, the determination of 153,512 housing units for the SACOG region has been proposed and adopted for the 8.2-year projection period of June 2021 through August 2029. SACOG's allocation increased by 46 percent between the 5th and 6th RHNA Cycle. Compared to the prior 5th Cycle, SACOG's increase is primarily attributed to the different housing climate in 2019, and the inclusion of two new existing need considerations (overcrowding and cost-burden). For the 5th Cycle, SACOG received a downward RHNA adjustment to account for the high vacancy rates as a result of the recession. The upward adjustment for the 6th Cycle is to help bring the SACOG's vacancy rate back to a healthy rate of 5 percent. The change in vacancy rates alone is the result of over 35,000 units being allocated to SACOG for the 6th Cycle of RHNA.

The methodology used by SACOG for its 2021-2029 Regional Housing Needs Plan (RHNP) starts by assigning projected and needed housing units according to the regional growth forecast.

SACOG then assigns the proportion of four housing income-categories (very low, low, moderate, above moderate) that each jurisdiction must plan for based on adjustment factors. The adjustment factors address accommodating regional income parity, affirmatively furthering fair housing and achieving a better jobs/housing balance.

The SACOG 6th Cycle RHNA methodology uses the following process:

1. Assumed expected housing growth according to the regional growth forecast accommodates a portion of the RHNA housing need for each jurisdiction
2. Assign remaining RHNA need to jurisdictions proportionally based on their regional growth forecast housing proportions
3. Apply Regional Income Parity adjustment: Jurisdictions with a lower proportion of lower income households receive a higher portion of lower income units; Jurisdictions with a higher proportion of lower income households receive a lower portion of lower income units.
4. Apply an Affirmatively Further Fair Housing adjustment: Jurisdictions with a higher proportion of units in high opportunity areas receive a higher proportion of lower income units; Jurisdictions with a lower proportion of units in high opportunity areas receive a lower proportion of lower income units.
5. Apply a Jobs/Housing Balance factor: Jurisdictions with a higher proportion of low-wage workers per affordable unit receive a higher proportion of lower income units; Jurisdictions with a lower proportion of low-wage workers per affordable unit receive a lower proportion of lower income units.
6. Weighting and balancing the three adjustment factors to assure that one adjustment factor is not disproportionately affecting the housing assignment.

San Diego Association of Governments (SANDAG)

SANDAG's 5th Cycle of RHNA determined a need for 161,980 units for the 7-year period of 2013 through 2021. For the current 6th Cycle, the determination of 171,685 housing units for the SANDAG region has been proposed and adopted for the 8.8-year projection period of June 2020 through April 2029. SANDAG's allocation increased by only 6 percent between the 5th and 6th RHNA Cycle.

Using their regional growth forecast as base data, the SANDAG's RHNA Plan methodology allocates RHNA units based primarily on transit proximity, secondly based on jurisdictions with a higher proportion of jobs, and third it more equally disburses very low, low, moderate, and above moderate income units among jurisdictions to better balance the proportion of housing income types in various jurisdictions.

This approach is geared towards the urban framework of the SANDAG region and urban levels of transit and employment. As a result, this approach would not likely work for the AMBAG area as the region does not have urban levels of transit service and jobs.

The SANDAG 6th Cycle RHNA methodology uses the following process:

1. Assign 65% of housing units to jurisdictions with access to transit, rail stations, rapid bus stations, and major transit stops.
 - a. 75% of units allocated to jurisdictions with rail stations and rapid bus stations
 - b. 25% of units allocated to jurisdictions with major transit stops
2. Assign remaining 35% of housing units to jurisdictions based on the proportion of jobs in their jurisdiction
3. Apply an equity adjustment to assign the proportion of the four housing income-categories (very low, low, moderate, above moderate) that each jurisdiction must plan for. Jurisdictions with a lower proportion of lower income households receive a higher portion of lower income units; Jurisdictions with a higher proportion of lower income households receive a lower portion of lower income units. This applies similarly to assigning the proportion of moderate and above moderate units.

Association of Bay Area Governments (ABAG)

ABAG’s 5th Cycle of RHNA determined a need for 187,900 units for the 8.5-year period of 2014 through 2022. For the current 6th Cycle, the determination of 441,176 housing units for the ABAG region has been proposed and adopted for the 8.5-year projection period of June 2021 through December 2030. ABAG’s allocation increased by 135 percent between the 5th and 6th RHNA Cycle. Compared to the prior 5th Cycle, ABAG’s large increase is primarily attributed to the projected economic growth that will attract more homeowners and renters into the area. This growth will additionally address the housing crisis in the Bay Area and promote more equity. ABAG housing units are distributed to ABAG’s nine counties: Alameda, Contra Costa, Marin, Napa, San Francisco, San Mateo, Solano, and Sonoma, along with its 101 cities and towns.

The ABAG approach applied two different methodologies for Very Low/Low units and Moderate/Above Moderate units. The methodology for low income units was more heavily weighted towards AFFH when allocating Very Low and Low Income units. The other methodology for Moderate and Above Moderate units was more heavily weighted on vehicle commutes (see below).

TWO-PART ABAG ALLOCATION	
Very Low & Low Income Allocation	Moderate & Above Moderate Allocation
70% AHOA (AFFH Factor)	40% AHOA (AFFH Factor)
15% Short Drive to Jobs (JPA)	60% Short Drive to Jobs (JPA)
15% Short Transit Ride to Jobs (JPT)	

Very Low and Low Income units were allocated with more emphasis on AFFH compliance. Moderate and Above Moderate populations were placed closer to job clusters to show consistency with the MTP where more mid-high income housing is structured around job centers, and higher income employees use less transit.

The ultimate split using this approach allocated the total RHNA as follows:

- 52% AFFH based (AHOA)
- 41% short drive to work (JPA)
- 7% short transit ride to work (JPT)

The ABAG 6th Cycle RHNA methodology uses the following process:

1. Comparable regions analysis was performed to calculate average overcrowding and cost-burden issues and make appropriate adjustments to housing need.
2. Housing growth proportions per jurisdiction according to the regional growth was used to assign RHNA housing need for each jurisdiction.
 - a. 70% access to high job opportunity areas. Opportunity areas are determined using the HCD and the California Tax Credit Allocation Committee (TCAC) 2020 Opportunity maps. This approach assigns lower income housing to higher income more affluent areas and achieves state goals of affirmatively furthering fair housing.
 - b. 15% short drive to work (within 30 minutes)
 - c. 15% short transit ride to work (within 45 minutes)
3. The proportion of moderate and above moderate units was assigned based on two factors.
 - a. 40% access to high job opportunity areas. Opportunity areas are determined using the HCD and the California Tax Credit Allocation Committee (TCAC) 2020 Opportunity maps. This approach assigns lower income housing to higher income more affluent areas and achieves state goals of affirmatively furthering fair housing.
 - b. 60% short drive to work (within 30 minutes)

Santa Barbara County Association of Governments

SBCAG's 5th Cycle of RHNA determined a need for 11,030 units for the 7.5-year period of 2008 through 2022. Santa Barbara County has only met 35 percent of the overall housing need for its 5th Cycle, which ends in 2022. For the upcoming 6th Cycle, SBCAG has released a draft housing need determination of 29,297 units for the 8.6-year projection period of June 2021 through February 2030. SBCAG's allocation will potentially increase by 165 percent between the 5th and 6th RHNA Cycle, depending on the approval of the 6th Cycle draft. SBCAG's 5th Cycle was the lowest allocation received of any cycle. This was the result of a downward adjustment by the HCD due to the high

vacancy rates during the recession. If approved, the 6th Cycle will be the highest allocation SBCAG has ever received.

The 6th Cycle RHNA methodology adopted by the SBCAG Board for its Regional Housing Needs Allocation Plan allocates regional housing need to local jurisdictions in four steps:

1. Divide the RHNA allocation between the North County area and South Coast areas of Santa Barbara County.
2. Apply a jobs-balance factor: using the SBCAG regional growth forecast as the base housing growth data, assign RHNA housing need to jurisdictions based on 60% of housing was weighted near existing jobs, and 40% near forecasted jobs.
3. Assign adjustment factors to the housing unit assignments based on overcrowding and cost-burden factors.
4. Apply an income parity adjustment to better address housing income group disparities. This approach addressed the assignment of the four housing income-categories (very low, low, moderate, and above moderate) that each jurisdiction must plan for. Jurisdictions with a lower than average proportion of any income category of housing receive a higher portion of that category of housing. For example, jurisdictions with a lower proportion of lower income households receive a higher portion of lower income units.

Butte County Association of Governments

BCAG's 5th Cycle of RHNA determined a need for 2,974 units for the 7.5-year period of 2014 through 2022. For the current 6th cycle, the determination of 15,506 housing units for the BCAG region has been proposed and adopted for the 8.5-year projection period of 2021 through 2030. BCAG's allocation increased by 421 percent between the 5th and 6th RHNA cycle. Compared to the prior 5th cycle, BCAG's large increase is primarily attributed to the fire damage that this region has endured.

The unit allocation methodology applies five weighted factors to distribute the regular growth allocation across BCAG's six-member jurisdictions. The fire rebuild allocation is separately assigned to the jurisdictions that lost units in the Camp Fire (the Town of Paradise and unincorporated Butte County) based on the total rebuild units assigned and each jurisdiction's proportionate loss of units in the fire.

The BCAG 6th Cycle RHNA methodology uses the following process:

1. The methodology starts with assigning a base allocation, which is the product of the jurisdictions' forecasted share of regular growth in the 2018–2040 BCAG Growth Forecast
2. BCAG used five factors for their RHNA methodology: Transit Connectivity, Jobs, Wildfire Risk, Agriculture and Forest Land Preserves, and an opportunity score as the factors to adjust the base allocation.
 - a. Transit Connectivity – The higher the proportion of transit access a jurisdiction has, the more housing assigned to the jurisdiction.
 - b. Jobs – The higher proportion of jobs in a jurisdiction, the more housing was assigned. BCAG used California Employment Development Department (EDD) and (2017) Longitudinal Employer-Household Dynamics (LEHD) OnTheMap estimates for this approach.
 - c. Wildfire Risk – The lower the proportion of high-fire risk area, the more housing was assigned to an area. The Wildfire Risk Factor uses 2020 CalFire measures of high- and very high-wildfire risk and geographic information system (GIS) analysis to determine what percentage of each jurisdiction's land is not at a high- or very-high risk of wildfire. The intent of this factor is to prioritize the construction of homes in jurisdictions with a lower risk of wildfire.
 - d. Agriculture and Forest Land Preserves – The larger the proportion of forest and agricultural land preserves in a jurisdiction, the less housing was assigned.
 - e. Opportunity – The lower the relative proportion of opportunity, the more housing was assigned. BCAG used both HCD/TCAC Opportunity Maps and Percent of Children Living Above the Poverty Level as an opportunity adjustment factor.
3. Factor Normalization: BCAG then balanced the five adjustment factors to assure that one adjustment factor is not disproportionately affecting the housing assignment.
4. Factor Weighting: BCAG then assigned weights to each factor. These weights establish what percentage of the total allocation will be distributed based on that factor.
 - a. Combined TCAC/HCD Opportunity and Childhood Poverty Status Factor: 10-percent weight
 - b. Transit Connectivity: 10-percent weight
 - c. Number of Jobs: 10-percent weight
 - d. Wildfire Risk: 10-percent weight
 - e. Agriculture and Forest Land Preserves: 10-percent weight

- f. Base Allocation: 50-percent weight
- 5. Final distribution: The five normalized and weighted factor adjustments were used to distribute the RHNA to each jurisdiction.



MEMORANDUM

TO: AMBAG Planning Directors Forum

FROM: Miranda Taylor, Planner

SUBJECT: 2021 Title VI Plan Development Process

MEETING DATE: February 25, 2021

RECOMMENDATION:

Staff will provide the Planning Directors Forum with an overview of the 2021 Title VI Plan development process. Planning Directors are asked to provide feedback on the development of the Draft 2021 Title VI Plan.

BACKGROUND:

Title VI is a Federal statute that mandates that no person shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance. The Federally required 2021 Title VI Plan is a comprehensive document that guides AMBAG in the Title VI process. AMBAG receives Federal funding through Caltrans and therefore is subject to this Federal requirement.

In 2012, the Federal Transit Administration set new guidelines for Caltrans requiring sub-recipients of Caltrans Planning Grants to submit a Title VI Plan to FTA every three years. AMBAG, as a sub-recipient of such funds and as the federally designated Metropolitan Planning Organization (MPO) for the Monterey Bay Region, must prepare and adopt a Title VI Plan at least once every three years. The 2021 Title VI Plan will cover the three-year period from 2021-2024 and must comply with FTA Circular 4702.1B. The 2021 Title VI Plan emphasizes the AMBAG Title VI process and procedures, including the use of public outreach techniques and innovative strategies to specifically include Limited English Proficiency (LEP) Populations within the region.

DISCUSSION:

The requirements for the 2021 Title VI Plan under FTA Circular 4702.1B incorporate environmental justice principles into plans, projects, and activities that receive funding from

FTA. The following guiding environmental justice principles must be considered through “all public outreach and participation efforts conducted by the FTA, its grantees and sub-grantees”:

- To avoid, minimize, or mitigate disproportionately high and adverse human health and environmental effects, including social and economic effects, on minority populations and low income populations.
- To ensure the full and fair participation by all potentially affected communities in the transportation decision making process, and to prevent the denial of, reduction in, or significant delay in the receipt of benefits by minority and low income populations.

A Title VI Plan is the required guide for all Title VI related activities conducted by AMBAG. As such, this plan will contain the procedures, strategies and techniques that will be used by AMBAG for increasing public involvement in all programs and projects that use Federal funds and creating a more inclusive public participation process for LEP Populations.

Below are key dates for developing the 2021 Title VI Plan:

- **February – March 2021:** Present an overview of the 2021 Title VI Plan development process
- **April – May 2021:** Develop the Draft 2021 Title VI/LEP Plan
- **June 2021:** Present the Draft 2021 Title VI Plan to Technical Advisory Committees and to the AMBAG Board of Directors
- **June 10- July 9, 2021:** 30-Day Public Comment Period
- **July 2021:** Prepare the Final 2021 Title VI Plan
- **August 11, 2021:** AMBAG Board of Directors will be asked to adopt the Final 2021 Title VI Plan

ATTACHMENTS:

1. 2021 Title VI Plan Draft Outline
2. Appendix E: 2021 LEP Draft Outline

AMBAG 2021 Title VI Plan Draft Outline

I. Introduction

- A. Background
- B. Governing Legislation
- C. Regional Roles and Responsibilities

II. Demographic Profile-Mobility Needs Identified

- A. Utilize U.S. Census Data to identify the total number and percentage of the population of every city and county by race within the AMBAG region

III. AMBAG Title VI Policy Statement

IV. Title VI Responsibilities

- A. MPO Responsibilities
- B. DOT Title VI Plan Checklist

V. Title VI Plan Timeline and Planning Process

VI. Public Participation Plan

Appendices

Appendix A: Title VI Assurances

Appendix B: AMBAG Title VI Notice to the Public

Appendix C: AMBAG Title VI Complaint Procedures

Appendix D: AMBAG Title VI Complaint Form

Appendix E: AMBAG 2021 LEP Plan (Please refer to Attachment 2 for Detailed LEP Draft Outline)

Appendix F: Title VI Program Approval

Figures

Figure 1-1: AMBAG Region Map

Figure 2-1: Demographic Mobility Needs Graph

Figure 2-2: Demographic Mobility Needs Graph: Hispanic/Latino Only

Figure 5-1: Title VI Plan Timeline

Appendix E: AMBAG 2021 LEP Draft Outline

I. LEP Plan Overview

II. Determination of Need

A. US DOT Four Factor Analysis of LEP Plan

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or recipient.
2. The frequency with which LEP persons come into contact with the program.
3. The nature and importance of the program, activity, or service provided by the program to people's lives.
4. The resources available to the recipient for LEP outreach, as well as the costs associated with that outreach.

III. LEP Outreach Strategies

- #### A. Public notices and notifications (flyers, notifications and Title VI complaint procedures in accessible areas offered in multiple languages)

IV. Data Collection Methods

- #### A. The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or recipient.

1. We will utilize ACS data for people who speak English "less than very well" (considered LEP persons) – LEP Households, 5 Year Estimates

- #### B. The resources available to the recipient for LEP outreach, as well as the costs associated with that outreach.

1. Providing translation services in public meetings
2. Language Assistance Measures
3. Cost of future services to implement Title VI Plan

V. Findings and Recommendations

Figures

Figure 2-1: LEP Households Map: AMBAG Region

Figure 2-2: LEP Households Map: Santa Cruz County

Figure 2-3: LEP Households Map: San Benito County

Figure 2-4: LEP Households Map: Monterey County