

Fred Castro

From: Gillian Adams
Sent: Wednesday, August 26, 2020 11:22 AM
To: Fred Castro
Subject: FW: RHNA Evaluation Criteria
Attachments: Letter re RHNA Evaluation Criteria.pdf

FYI.

From: Jeffrey Levin [REDACTED]
Sent: Wednesday, August 26, 2020 11:18 AM
To: [REDACTED]
Subject: RHNA Evaluation Criteria

External Email

Dear ABAG Staff and Consultants-

Attached please find comments from several HMC members regarding evaluation criteria for assessing potential RHNA methodologies, particularly with respect to the equity and Affirmatively Furthering Fair Housing objectives.

We hope the HMC will have the opportunity to discuss and decide on the evaluation metrics and their application prior to making a final decision on the methodology formula itself.

We would appreciate it if this letter can be shared with all HMC members and the public.

Thank you.

Jeff Levin, Policy Director

NOTE: I am generally in the office only on Monday afternoons and all day on Tuesday and Thursday, so I may not be able to reply to your e-mail right away.

East Bay Housing Organizations (EBHO)
[REDACTED]

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August 25, 2020

Dear ABAG Staff and Consultants,

As members of the Regional Housing Needs Allocation (RHNA) Housing Methodology Committee (HMC), we want to first thank you for your leadership and guidance in moving us forward on this complex process. We have been tasked with translating the statutory requirements and objectives of RHNA, as well as priorities and values of the Association of Bay Area Governments (ABAG), into a technical methodology. As such, there are many complementary outcomes that the RHNA methodology must work to achieve. The evaluative criteria that we will be discussing at the upcoming HMC meeting are critical to ensuring that our ruler for measuring our success at meeting these statutory objectives is accurate and equitable, and that applying the evaluative criteria to potential methodologies appropriately directs us towards how the factors and weights must continue to be refined to meet our desired outcomes.

We are writing today to comment specifically on the affirmatively furthering fair housing (AFFH) evaluative criteria. We first want to acknowledge and thank staff for thinking deeply about what a meaningful AFFH evaluative criteria might be. **While we support the general approach taken by staff, we believe the AFFH evaluative criteria as proposed does not sufficiently identify areas of long-standing racial and socioeconomic exclusion and ensure these jurisdictions receive appropriate and equitable allocations that affirmatively further fair housing in a meaningful way.**

- **The current criteria are not inclusive enough to meaningfully ensure AFFH.** The current proposed criteria only identify jurisdictions accounting for about 12 percent of the region's population. This is far too narrow a subset of jurisdictions to accurately reflect the extent of segregation across the region and thus too limited to make a meaningful difference in combating racial segregation and removing barriers to opportunity in our region. We recommend adjusting the criteria so they align more closely with existing research on the extent of segregation in the Bay Area.
- **New criteria must continue to include an explicit measure of racial exclusion.** We appreciate that in the current evaluative criteria, the divergence index is part of that composite metric. Having a metric like this, that deals explicitly with racial segregation is imperative to achieving the AFFH statutory objective and fulfilling our commitment to racial equity. As staff work to refine or create a new AFFH evaluative criteria, a race-specific variable must be maintained. One method is to use **a more inclusive composite score** of divergence index and percent of households with above-moderate incomes for each jurisdiction, filtering out cities in the lowest quartile of median income to avoid further concentrating affordable housing in high segregation, low-income areas. Another way is to **measure exclusion of low-income Black and Latinx people of color, for example, looking at jurisdictions that have a below-average percentage**

of Black and Latinx combined, coupled with income (either a high proportion of moderate income or a median household income greater than \$100,000).

- **The AFFH criteria must be designed to facilitate appropriate and equitable allocations that affirmatively further fair housing in a significant way.** For the group of cities identified as high exclusion, the allocations must be adjusted to ensure that these cities get a share of the region's housing need, particularly for very low and low income, that is higher than their share of the region's 2019 household distribution. We believe this metric and its application as a floor on allocations to exclusionary jurisdictions are necessary to ensure that this RHNA will change the patterns of racial segregation in our region.

We look forward to discussing this further at the August 28 HMC meeting.

Thank you for your hard work and attention to this matter.

Signed,

Jeffrey Levin
Fernando Marti
Rodney Nickens, Jr.
Carlis Romero