

**Cities Association of Santa Clara County**  
**Sub Regional RHNA Process**  
**February 10, 2011**

**Background**

On January 12, 2011, the City Managers' Association (CMA) expressed concerns about staffing and available financial resources to develop a subregional Regional Housing Needs Assessment (RHNA) methodology under the time constraints of State law (see pros and cons on next page). On February 9, 2011, the CMA considered a recommendation from the Santa Clara County Planning Officials (SCCAPO) that suggests enhanced collaboration between the cities in the County and begins to foster an appropriate structure that may be used in 8 years (the next housing cycle) to develop a formal subregional RHNA.

**Recommendation to the Cities Association of Santa Clara County**

Santa Clara County's 15 cities and the County should not at this time establish a formal subregion in the current RHNA process, but instead should pursue an informal, collaborative process that ensures many of the benefits of forming a subregion. This cooperation and collaboration would:

- Utilize existing forums for communication and participation (e.g., Cities Association, City Managers' Association, SCCAPO, Housing Action Coalition, etc.)
- Pilot mechanisms for engagement and collaboration
- Provide an opportunity for a unified voice representing the South Bay at the Housing Methodology Committee, ABAG Board meetings, and other forums
- Maintain the ability of contiguous jurisdictions to trade RHNA numbers
- Utilize the same methodology as ABAG (SCCAPO did not express a desire to create its own methodology)
- Facilitate future collaboration sharing Housing Element consultants, analyses and policies, and potentially resulting in shared review by the California Housing and Community Development (HCD) Department
- Generate a White Paper for consideration by the Cities Association, outlining a recommended structural arrangement to create a Santa Clara County subregion in eight years, including identification of resources, mechanisms for decision-making, etc.

To help guide the informal process, the Cities Association may decide to endorse the following principles:

1. Ensure a fair share distribution of total housing growth and affordable housing within the County.
2. Allocate housing growth strategically around major transportation corridors respecting infrastructure constraints and the unique natural resources of Santa Clara County.
3. Foster collaboration between jurisdictions and provide a framework for resource / housing allocation trade-offs.
4. Facilitate an open dialogue between jurisdictions, the general public, and interested organizations.
5. Utilize existing forums for discussion (e.g., Cities Association, City Managers' Association, SCCAPO, Housing Action Coalition, etc.).

## Pros and Cons of a Formal RHNA Subregion for Santa Clara County

| Pros   | Cons  |
|--|---|
| <ul style="list-style-type: none"><li>• More local control/self-determination</li></ul>  | <ul style="list-style-type: none"><li>• Subregion is responsible and accountable for allocation and distribution (can't blame ABAG)</li></ul>                   |
| <ul style="list-style-type: none"><li>• Better placement of housing and protection of community character</li></ul>  | <ul style="list-style-type: none"><li>• Time and staff resources needed to develop new methodology</li></ul>  |
| <ul style="list-style-type: none"><li>• Opportunity for the County to show leadership</li></ul>  | <ul style="list-style-type: none"><li>• Need to determine structure and process for development of methodology, including stakeholder involvement</li></ul>     |
| <ul style="list-style-type: none"><li>• Opportunity to strengthen Planning Officials organization (SCCAPO) as policy advisory body to City Managers' Association and Cities Association of SC County</li></ul> | <ul style="list-style-type: none"><li>• Funding and staffing is not currently available to complete this work (estimated initial cost of \$250,000)</li></ul>   |
| <ul style="list-style-type: none"><li>• More flexibility to negotiate and trade units</li></ul>  | <ul style="list-style-type: none"><li>• No money is available for trades</li></ul>  |
| <ul style="list-style-type: none"><li>• Foster collaboration and coordination</li></ul>  | <ul style="list-style-type: none"><li>• Some of these items can be pursued without a subregion (e.g., trades, purchasing sewer capacity/water supply)</li></ul> |
| <ul style="list-style-type: none"><li>• HCD may offer consistent and timely review of all of the County's Housing Elements</li></ul>   | <ul style="list-style-type: none"><li>• Could stress relationships between cities in the County</li></ul>   |
| <ul style="list-style-type: none"><li>• Could lead to reduced costs if cities later decide to use the same consultant to prepare housing elements, or share resources/coordinate on policies/etc.</li></ul>    | <ul style="list-style-type: none"><li>• A lot of work and may still end up with same ABAG methodology and/or allocation</li></ul>                               |
| <ul style="list-style-type: none"><li>• Could lead to grants for affordable housing education</li></ul>  | <ul style="list-style-type: none"><li>• Can't promise positive outcomes</li><li>• Some cities might not participate</li><li>• Might fail</li></ul>              |