### Do cities' Housing Element sites Affirmatively Further Fair Housing? The AFFH Sites Score

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#### **Introduction: Presentation and Data Needs**

In this presentation, we illustrate how the AFFH Sites Score works, through hypothetical distributions of sites and the actual distribution of sites from Santa Monica's 5th cycle Housing Element.

**Data:** We use three variables to describe neighborhoods: 1) their residential land area, 2) planned capacity for affordable housing (number of units) as reported in the Housing Element, and 3) median household income (or another way to rank neighborhood "opportunity").

#### Introduction: What is AFFH?

As of 2017, California Goverment Code § 8899.50 defines **Affirmatively Furthering Fair Housing** as taking meaningful actions, in addition to combating discrimination, that:

- overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics
- address significant disparities in housing needs and in access to opportunity
- replace segregated living patterns with truly integrated and balanced living patterns
- transform racially and ethnically concentrated areas of poverty into areas of opportunity
- foster and maintain compliance with civil rights and fair housing laws

#### Introduction: The AFFH Sites Score

A quantitative measure of how cities allocate their share of regional need for affordable housing between neighborhoods is needed to assess the quality of plans to reverse the legacy of segregation and Affirmatively Further Fair Housing (AFFH).

This measure should tell us, are cities allowing affordable housing to be built in their "highest-opportunity" neighborhoods?

#### **Two Hypothetical Affordable Housing Plans**



Share of allocated units by income quantile

Low: **70%**, Mid: **20%**, High: **10%** 

Share of allocated units by income quantile

Low: 10%, Mid: 20%, High: 70%

#### **Two Hypothetical Affordable Housing Plans**



Land Area (%)

Sites allocated for affordable housing

# How can we measure different plans for siting affordable housing?

#### **Our proposed metric: The AFFH Sites Score**

The metric is based on the Gini Coefficient, a standard measure of income inequality. First, neighborhoods are ranked by household income. Then, we measure the share of low-income sites and land by neighborhood (Figure A), and compare the cumulative shares across neighborhoods (Figure B).



#### **Our proposed metric: The AFFH Sites Score**

The metric is the area between the two lines of cumulative distributions. It ranges from from -1 to 1, depending on how many sites are located in lower or higher income neighborhoods. -1 indicates all sites are in the lowest income neighborhood, 0 is the status quo (an equal distribution of sites across), and 1 is all sites in the highest income neighborhood.



Median Household Income (Block Groups)

Formula:

Sum (for each BG, the cumulative % of land area cumulative % of sites ) / potential min (100% of sites in lowest income BG) or max (100% of sites in highest income BG)

#### **Three Hypothetical Affordable Housing Plans**



Plan A: AFFH Score -0.62

#### Plan B: AFFH Score 0

Plan C: AFFH Score 0.50

## Santa Monica

Applying the proposed metric to 5th cycle site inventory

#### Santa Monica: 5th Cycle Site Inventory: AFFH Score of -0.39



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#### **Potential for Extension**

This measure addresses only one dimension of AFFH - the neighborhood features of potential sites for affordable housing. This dimension is most important for larger cities with exclusionary neighborhoods.

One extension would be use variables beyond income to rank neighborhoods. The structure we present could be used for other neighborhood variables, like environmental quality, or indexes like the opportunity index.

#### **Conclusion and Considerations**

One final consideration is that the AFFH Sites Score is more important for cities with heterogeneous neighborhoods. Affordable housing built *anywhere* in cities that are uniformly "high opportunity" advances fair housing goals. Nonetheless, these places should also make affordable housing production possible in their "highest opportunity" neighborhoods.

Santa Monica is a good example of this issue. All census tracts in the city are "high-resource" according to the TCAC/HCD Opportunity Maps, yet the city disproportionately sites affordable housing in its lowest-income neighborhoods.