

MEMO

To: Gabriel Perez, City of Coachella
From: Lisa Wise Consulting, Inc. (LWC)
Date: 7/28/2021
Subject: Housing Element Update AFFH requirements

In late April 2021, the California Department of Housing and Community Development (HCD) issued new guidelines for the suitable analyses for affirmatively furthering fair housing (AFFH) as a requirement for certification of Housing Elements in the 6th Cycle. These new requirements are significantly more detailed and extensive than had been anticipated prior to the issuance of this guidance.

Before April, it was expected that programs and activities to support fair housing would need to be specified as part of the policy and program recommendations, along with considerations related to housing sites selection. HCD is now requiring the inclusion of a separate, extensive appendix in the Housing Element with specified spatial and quantitative analysis of the conditions of protected classes. This is now a requirement for certification.

Based on our experience addressing the new AFFH requirements on Housing Element Updates in the SCAG, SACOG and ABAG regions, including working with HCD's AFFH Data Viewer, LWC anticipates the required AFFH analysis will cost approximately \$13,000. This cost estimate reflects LWC's understanding that CVAG is not assisting jurisdictions in the AFFH analysis.

To address the AFFH requirements in Coachella with funds from our existing agreement, we propose:

- 1) Reallocate \$10,000 from Task 6.3 Survey to a new task, "AFFH Analysis" (new task 2.F)
- 2) Allocate up to \$3,000 on a time and materials basis to "AFFH Analysis" through change order (#3)

LWC is committed to supporting the City of Coachella through the HCD certification process in the most effective manner possible. We are available to discuss this matter by phone or video conference at the City's discretion.