

40,000 Unsubsidized Affordable Homes At Risk

LOSING CALIFORNIA'S UNSUBSIDIZED AFFORDABLE HOMES

Using a proprietary methodology, the Partnership identifies unsubsidized affordable properties that due to their age, location, or other market factors, offer rents we estimate are affordable to low-income households.¹ For the purpose of this analysis, we define unsubsidized affordable properties as apartment buildings with five or more units (which is the state's definition of multifamily housing) where at least half of the apartments have rents affordable to households earning 80% of the median income for that zip code.^{2,3,4} Increasingly, these properties have been targeted for acquisition and conversion by for-profit entities seeking to maximize rents, leading to the displacement of low-income residents and the loss of affordability for future low-income residents. Unless the state provides the resources for these properties to be preserved by mission-driven, nonprofit-controlled organizations with the support and oversight of local government housing agencies, unsubsidized affordable housing will eventually become extinct in California given the current rate of loss documented below.

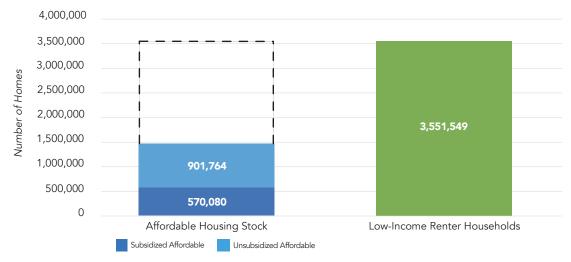


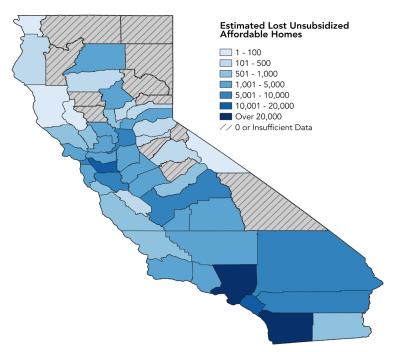
FIGURE 1: Statewide Affordable Housing Stock and Housing Needs

Sources: California Housing Partnership Analysis of CoStar Multifamily Property Database, 2024; California Housing Partnership Preservation Database, April 2025; Analysis of 1-year ACS PUMS data (2023) with HUD income levels.

As of 2024, there are an estimated 901,764 affordable homes across 57,200 unsubsidized affordable properties throughout the state (see Figure 1) – representing significantly more homes than the 570,080 government-regulated affordable rental homes (as of April 2025). However, even combined, both sources fall far short of meeting the housing needs of the state's approximately 3.55 million lower-income renter households, who are estimated to need about an additional 1.03 million homes.^{5,6} The large gap between the number of lower-income renter households and the prevalence of multifamily affordable housing in California is a significant reason why about 79% of the state's low-income households are rent-burdened.⁷

WHAT HAS BEEN LOST?

FIGURE 2: Estimated Lost Unsubsidized Affordable Homes by County



Source: California Housing Partnership Analysis of CoStar Multifamily Property Database, 2024.

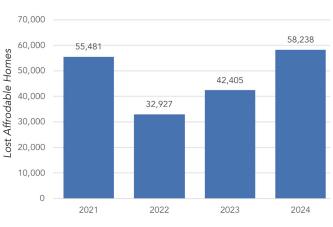
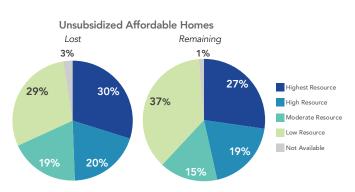


FIGURE 3: Annual Affordability Loss Since 2020

Sources: California Housing Partnership Analysis of CoStar Multifamily Property Database, 2024 Since mid-2020, an estimated 189,051 formerly unsubsidized affordable homes are no longer affordable to low-income households.⁸ These homes are largely concentrated in the Bay Area and Southern California regions of the state, as well as Sacramento and Fresno Counties (*see Figure 2*). Appendix A provides a more detailed look for each county.

The state's stock of unsubsidized affordable housing experienced a significant decline following the onset of the COVID-19 pandemic in 2020, with approximately 29% of homes likely lost between 2020 and 2021. Although there was a slight decrease in 2022, concerningly the number of lost affordable homes ticked up between 2022-2023 and 2023-2024 (see Figure 3). It is likely that the 2019 California Tenant Protection Act, which limits rent increases to 10% annually, mitigated the worst effects of the pandemic and subsequent housing market fluctuations on unsubsidized affordable housing, as well as federal, statewide, and local eviction moratoriums.⁹

FIGURE 4: Lost and Remaining Homes by TCAC HCD Opportunity Areas, 2024



Sources: California Housing Partnership Analysis of CoStar Multifamily Property Database, 2024; TCAC/HCD Opportunity Area Maps, 2024.

Displacement from an unsubsidized affordable property is particularly concerning from a fair housing perspective as about **49%** of lost unsubsidized affordable homes are located in **High** or **Highest Resource** areas as defined by the California Tax Credit Allocation Committee (TCAC) and Department of Housing and Community Development (HCD) 2024 Opportunity Map (see Figure 4).¹⁰

WHAT IS AT-RISK OF BEING LOST IN 2025 AND BEYOND?

44 of 58 counties have at least 100 at-risk affordable homes.

Multifamily unsubsidized affordable properties comprise nearly 24% of California's total multifamily housing stock (regardless of affordability), totaling an estimated 901,764 affordable homes (see Appendix A). Among these, an estimated **39,738 homes** are currently at **very high risk** of losing their affordability with an additional **268,693 to 333,819 homes at high or moderate risk** in five years¹¹ – with the highest concentrations in Southern California and the Bay Area (see Figure 5).¹²

UNSUBSIDIZED AFFORDABLE HOUSING RISK MODEL

The California Housing Partnership analyzes conversion patterns among the state's stock of unsubsidized affordable housing to identify which homes are most immediately at-risk of losing their affordability. While previous versions of this report relied on a tract-level risk index, for the first time the Partnership is able to identify immediate risk and project future risk at the property-level for every identified unsubsidized affordable housing property in the state using our Unsubsidized Affordable Housing Risk Model.¹³

The Index is categorized as follows:

Mo

Very High risk based on property-level model prediction
High risk in 5 years based on projected rents and incomes
oderate risk in 5 years based on projected property-level model prediction

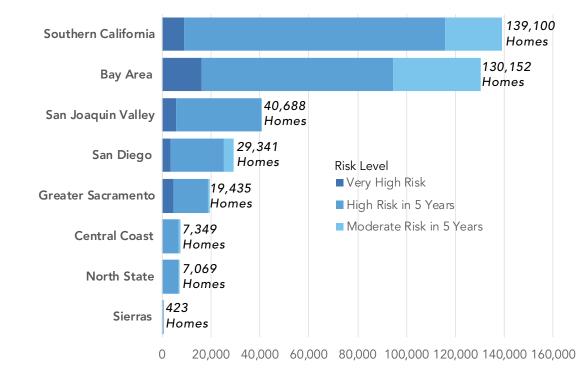


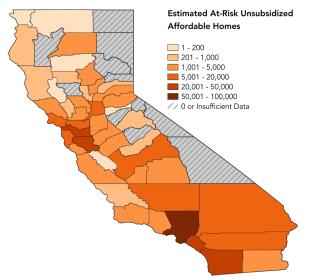
FIGURE 5: At-Risk Unsubsidized Affordable Housing by Region*¹⁴

*See footnote 14 for region definitions.

Source: California Housing Partnership Analysis of CoStar Multifamily Property Database, 2024.

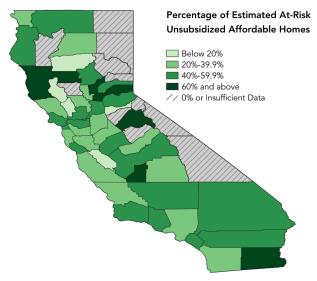
GEOGRAPHIC DISTRIBUTION OF AT-RISK HOMES

FIGURE 6: Estimated At-Risk Unsubsidized Affordable Homes by County



Source: California Housing Partnership Analysis of CoStar Multifamily Property Database, 2024.

FIGURE 7: Percentage of Estimated At-Risk Unsubsidized Affordable Homes by County



Source: California Housing Partnership Analysis of CoStar Multifamily Property Database, 2024.

Most Populous Counties Ranked by Estimated At-Risk Unsubsidized Affordable Homes

1	Los Angeles	78,028
2	San Diego	35,216
3	Alameda	29,341
4	Santa Clara	28,445
5	Orange	26,585
6	San Bernardino	15,170
7	San Francisco	14,201
8	Fresno	13,534
9	Riverside	13,271
10	Contra Costa	12,540
11	Sacramento	7,666
12	Kern	4,034

Nearly 3/4 of California's at-risk homes are located in these 12 counties.

Most Populous Counties Ranked by Percentage of Estimated At-Risk Unsubsidized Affordable Homes

1	Fresno	59.4%
2	San Diego	56.2%
3	Riverside	55.5%
4	Kern	52.1%
5	San Bernardino	49.5%
6	Contra Costa	45.4%
7	Los Angeles	43.3%
8	Orange	41.4%
9	Sacramento	38.8%
10	San Francisco	37.2%
11	Alameda	36.6%
12	Santa Clara	34.5%

(See Appendix B for more data on at-risk affordable homes by county.)

WHAT CAN STATE LEADERS DO?

The consistently high rate of unsubsidized affordable housing loss is a major concern. It is reasonable to expect that the loss rate will continue to stay high or increase unless additional state action is taken, or an interruption of the capital markets financing acquisitions and conversions by for-profit entities. To help mitigate this loss, the following policies are ways that state leaders can provide the tools necessary for local governments and nonprofit, mission-driven organizations to effectively acquire and preserve existing unsubsidized affordable housing in California:

- Prioritize a \$10 billion affordable housing bond on the November 2026 ballot. Assembly Bill 736 (Wicks) and Senate Bill 417 (Cabaldon) propose a \$10 billion bond that would significantly accelerate and expand new affordable housing. The bond would include \$500 million for the Community Anti-Displacement and Preservation Program (CAPP) as proposed in SB 225 (Caballero) of 2023, which would allow mission-driven affordable housing entities to purchase at-risk unsubsidized affordable developments. CAPP could spur the preservation of 3,600 homes providing affordable homes for 39,600 low-income households over the next 55 years.
- 2. Establish the Affordable Housing Preservation Tax Credit, as proposed by AB 1911 (Gabriel) of 2022, to encourage property owners to voluntarily sell at-risk properties to experienced affordable housing organizations who will operate them as affordable housing for low-income households for 55 years. As an incentive to sell to an affordable housing entity, the seller receives a 50% credit against the state and federal capital gains otherwise owed.
- 3. Provide tenants and community organizations with a first right of offer when rental housing is put up for sale, as proposed in AB 919 (Kalra) of 2023.
- 4. Eliminate the 2030 sunset on, and close remaining loopholes in, AB 1482 of 2019 and SB 567 of 2023, the Tenant Protection Act and subsequent law (including the statewide rent cap).
- 5. Collect rental cost data on large and small privately-owned apartment complexes to better understand the distribution of at-risk unsubsidized affordable properties, either through a statewide rental registry as proposed in AB 2469 (Wicks) of 2022 or regional rental registries as proposed in AB 2396 (Reyes) of 2024.
- 6. Require property owners to disclose true ownership through corporate transparency and beneficial ownership reporting as proposed in SB 1201 (Durazo) of 2024.



The Roadmap provides a bold vision for solving California's affordable housing challenges. **Learn more at <u>roadmaphome2030.org</u>** For additional policies to help protect renters, please see the <u>Protect People category</u> in the Roadmap Home 2030. For more on policy solutions, contact our Director of Advocacy, Mark Stivers at mstivers@chpc.net.

APPENDIX A: MULTIFAMILY UNSUBSIDIZED AFFORDABLE HOUSING (UAH) BY COUNTY*

County	Estimated Multifamily UAH Properties	Total Units in Multifamily UAH Properties	Total Affordable Units in Multifamily UAH Properties	County	Estimated Multifamily UAH Properties	Total Units in Multifamily UAH Properties	Total Affordable Units in Multifamily UAH Properties
Alameda	4,633	77,035	71,465	Orange	3,151	56,140	51,231
Alpine	-	-	-	Placer	129	3,699	3,403
Amador	14	288	256	Plumas	-	-	-
Butte	235	7,084	6,527	Riverside	1,333	31,294	29,249
Calaveras	-	-	-	Sacramento	1,420	30,854	28,986
Colusa	-	-	-	San Benito	48	1,173	1,165
Contra Costa	1,340	29,265	27,280	San Bernardino	2,153	35,607	32,699
Del Norte	13	358	356	San Diego	5,636	84,548	75,629
El Dorado	144	3,820	3,634	San Francisco	4,432	56,869	49,329
Fresno	895	29,009	26,991	San Joaquin	790	13,136	12,674
Glenn	29	508	476	San Luis Obispo	169	2,812	2,665
Humboldt	65	1,290	1,169	San Mateo	2,895	46,923	43,864
Imperial	80	2,875	2,806	Santa Barbara	273	5,211	4,994
Inyo	-	-	-	Santa Clara	4,112	108,059	102,136
Kern	587	13,425	12,912	Santa Cruz	188	3,248	2,815
Kings	97	5,006	4,949	Shasta	185	4,265	4,021
Lake	21	261	255	Sierra	-	-	-
Lassen	-	-	-	Siskiyou	22	338	312
Los Angeles	17,712	241,270	213,285	Solano	358	9,189	8,228
Madera	83	1,872	1,824	Sonoma	831	14,365	13,946
Marin	646	10,128	9,564	Stanislaus	472	9,116	8,827
Mariposa	-	-	-	Sutter	84	1,923	1,847
Mendocino	63	1,342	1,328	Tehama	16	601	601
Merced	329	7,591	7,504	Trinity	-	-	-
Modoc	-	-	-	Tulare	277	6,712	6,289
Mono	18	264	253	Tuolumne	14	369	302
Monterey	312	7,700	6,576	Ventura	464	9,205	8,144
Napa	139	2,277	2,014	Yolo	157	4,246	3,981
Nevada	29	612	552	Yuba	72	1,890	1,855
				TOTALS	57,200	985,670	901,764

* The Partnership defines unsubsidized or "naturally-occurring" affordable housing as: apartment buildings with five or more units where at least half of the apartments have rents affordable to households earning 80% of the median income for that zip code. Counties with fewer than ten (10) estimated properties in the analysis do not have data shown but are included in the totals.

Sources: California Housing Partnership Analysis of CoStar Multifamily Property Database, accessed September 2024.

TRACT RISK APPROACH APPENDIX B: LOST MULTIFAMILY UNSUBSIDIZED AFFORDABLE HOUSING (UAH) & RISK ASSESSMENT BY COUNTY*

				UAH at Risk of Conversion			
County	Total UAH (Historic, 2020-2024)	Lost UAH	Total UAH (Current, 2024)	Very High	High in 5 Years	Moderate in 5 Years	
Alameda	86,653	15,188 (17.5%)	71,465	5,613	16,593	4,379	
Alpine	-	-	-	-	-	-	
Amador	362	106 (29.3%)	256	0	48	0	
Butte	7,908	1,381 (17.5%)	6,527	249	2,690	179	
Calaveras	-	-	-	-	-	-	
Colusa	-	-	-	-	-	-	
Contra Costa	29,944	2,664 (8.9%)	27,280	174	11,605	2,422	
Del Norte	359	3 (0.8%)	356	0	44	80	
El Dorado	4,094	460 (11.2%)	3,634	458	1,047	264	
Fresno	36,064	9,073 (25.2%)	26,991	2,832	12,180	158	
Glenn	476	0 (0.0%)	476	0	296	0	
Humboldt	1,292	123 (9.5%)	1,169	0	665	0	
Imperial	3,576	770 (21.5%)	2,806	0	1,354	434	
Inyo	-	-	-	-	-	-	
Kern	16,057	3,145 (19.6%)	12,912	90	7,554	22	
Kings	7,129	2,180 (30.6%)	4,949	1,630	2,312	30	
Lake	277	22 (7.9%)	255	0	15	0	
Lassen	-	-	-	-	-	-	
Los Angeles	263,195	49,910 (19.0%)	213,285	1,121	58,927	17,980	
Madera	2,529	705 (27.9%)	1,824	0	409	0	
Marin	11,082	1,518 (13.7%)	9,564	646	3,771	793	
Mariposa	-	-	-	-	-	-	
Mendocino	1,369	41 (3.0%)	1,328	0	713	98	
Merced	8,678	1,174 (13.5%)	7,504	680	3,298	0	
Modoc	-	-	-	-	-	-	
Mono	267	14 (5.2%)	253	0	0	0	
Monterey	7,376	800 (10.8%)	6,576	92	2,515	0	
Napa	2,649	635 (24.0%)	2,014	0	389	0	
Nevada	867	315 (36.3%)	552	0	281	0	
Orange	63,392	12,161 (19.2%)	51,231	3,625	22,292	2,528	

*Counties with fewer than ten (10) estimated properties in the analysis do not have data shown but are included in the totals. Sources: California Housing Partnership Analysis of CoStar Multifamily Property Database, accessed September 2024.

TRACT RISK APPROACH APPENDIX B: LOST MULTIFAMILY UNSUBSIDIZED AFFORDABLE HOUSING (UAH) & RISK ASSESSMENT BY COUNTY*

				UAH at Risk of Conversion			
County	Total UAH (Historic, 2020-2024)	Lost UAH	Total UAH (Current, 2024)	Very High	High in 5 Years	Moderate in 5 Years	
Placer	6,492	3,089 (47.6%)	3,403	545	1,426	75	
Plumas	-	-	-	-	-	-	
Riverside	37,228	7,979 (21.4%)	29,249	3,114	9,092	1,065	
Sacramento	35,775	6,789 (19.0%)	28,986	3,612	8,514	414	
San Benito	1,271	106 (8.3%)	1,165	0	119	18	
San Bernardino	39,102	6,403 (16.4%)	32,699	108	12,813	613	
San Diego	103,941	28,312 (27.2%)	75,629	3,574	21,669	4,098	
San Francisco	56,621	7,292 (12.9%)	49,329	425	8,047	15,038	
San Joaquin	14,690	2,016 (13.7%)	12,674	306	3,956	0	
San Luis Obispo	3,369	704 (20.9%)	2,665	18	748	158	
San Mateo	48,703	4,839 (9.9%)	43,864	1,078	7,567	7,843	
Santa Barbara	6,148	1,154 (18.8%)	4,994	258	1,706	35	
Santa Clara	108,725	6,589 (6.1%)	102,136	7,318	22,985	4,913	
Santa Cruz	3,589	774 (21.6%)	2,815	0	1,282	400	
Shasta	5,303	1,282 (24.2%)	4,021	0	1,347	0	
Sierra	-	-	-	-	-	-	
Siskiyou	312	0 (0.0%)	312	0	162	0	
Solano	9,803	1,575 (16.1%)	8,228	824	2,892	419	
Sonoma	14,916	970 (6.5%)	13,946	0	4,377	41	
Stanislaus	10,178	1,351 (13.3%)	8,827	168	2,936	0	
Sutter	2,672	825 (30.9%)	1,847	0	640	0	
Tehama	871	270 (31.0%)	601	0	58	0	
Trinity	-	-	-	-	-	-	
Tulare	7,362	1,073 (14.6%)	6,289	112	1,962	53	
Tuolumne	471	169 (35.9%)	302	0	242	0	
Ventura	9,687	1,543 (15.9%)	8,144	988	2,484	562	
Yolo	5,141	1,160 (22.6%)	3,981	80	1,135	14	
Yuba	2,178	323 (14.8%)	1,855	0	1,211	0	
TOTALS	1,090,815	189,051 (17.3%)	901,764	39,738	268,693	65,126	

*Counties with fewer than ten (10) estimated properties in the analysis do not have data shown but are included in the totals. Sources: California Housing Partnership Analysis of CoStar Multifamily Property Database, accessed September 2024.

DATA NOTES & SOURCES

- Unsubsidized affordable housing is also sometimes referred to as "naturally-occurring affordable housing" (NOAH). For different uses
 of each term, see for example Enterprise Community Partners, "Preserving Affordability, Preventing Displacement: Acquisition-Rehabilitation of Unsubsidized Affordable Housing in the Bay Area." April 2020. <u>https://www.enterprisecommunity.org/resources/preservingaffordability-preventing-displacement-acquisition-rehabilitation-unsubsidized; and Kling, et al. "Preserving the largest and most ar-risk
 supply of affordable housing." February 2021, McKinsey & Company. <u>https://www.mckinsey.com/industries/public-sector/our-insights/
 preserving-the-largest-and-most-at-risk-supply-of-affordable-housing</u>.
 </u>
- 2. Many of California's unsubsidized affordable homes likely exist within two- to four-unit properties, which are not captured in this report. CoStar data limitations prevent analysis of this subset – the Partnership hopes to investigate these properties in future research.
- 3. Estimates provided in this report are approximations of the statewide multifamily unsubdisized affordable housing stock based on data provided by CoStar for properties with rental costs and interpolation for those properties with unavailable rental data.
- 4. Note that the methodology for generating statewide estimates, including interpolating data for missing properties, has changed since this report was first published – resulting in some differences in overall findings. The earlier version of this report generated estimates for missing data based on statewide trends of property characteristics, while this report generates estimates for missing data based on nearby multifamily properties. The approach used in this report has proven to provide more accurate results, especially at the countyand neighborhood-level, as the previous statewide methodology was overly impacted by trends in larger counties like Los Angeles.
- These figures do not explicitly account for low-income households utilizing Housing Choice Vouchers <u>according to HUD</u> there 318,669 vouchers in use in California (including 61,209 project-based vouchers) as of November 2024. To understand the full scope of affordable housing need in California, see the Partnership's Housing Needs Dashboard: <u>https://chpc.net/housingneeds/</u>.
- According to the state's 6th cycle Regional Housing Needs Allocation (RHNA), all regions need to produce a collective 1,028,394 low- and very low-income homes. For more on RHNA, see: <u>https://www.hcd.ca.gov/planning-and-community-development/regionalhousing-needs-allocation</u>.
- 7. California Housing Partnership analysis of 2023 one-year American Community Survey (ACS) PUMS data with HUD income levels. A costor rent-burdened household pays more than 30% of gross monthly income towards housing costs.
- "Homes" refers to individual units within a property, rather than properties as a whole. In our analysis of the CoStar Multifamily Property Database – including both remaining and lost properties – we track an estimated total 1,090,815 affordable/formerly affordable homes across 65,721 properties.
- For instance, the U.S. Government Accountability Office (GAO) found that eviction moratoriums at the federal, state, and local levels reduced eviction filings during the COVID-19 pandemic – although not all eligible renters benefitted. See: GAO, "COVID-19 Housing Protections Moratoriums Have Helped Limit Evictions, but Further Outreach Is Needed." March 2021. Website: <u>https://www.gao.gov/ products/gao-21-370</u>.
- 10. For more information on the TCAC/HCD Opportunity Map, see: <u>https://www.treasurer.ca.gov/ctcac/opportunity.asp</u>.
- 11. These estimates are based on projecting changing rent and income patterns out to 2029 in a two-step process. In step 1, properties are marked as at-risk if their projected asking rents and relative neighborhood income no longer lead to a property being classified as "affordable" these are considered **high risk in five years.** In step 2, the Unsubsidized Affordable Housing Risk Model is applied to the remaining projected unsubsidized affordable properties properties flagged by the model are considered **moderate risk in five years.**
- 12. As noted above, the magnitude of estimated at-risk homes differs from the first time this report was published. This is in part due to methodological changes in identifying unsubsidized affordable housing and providing statewide estimates. Again, this method has proven to provide more accurate results in identifying specific at-risk properties, which provides better estimates especially at the county- and neighborhood-level, as the former method was too strongly impacted by the characteristics of large counties like Los Angeles. These changes are also in part due to the nature of highly variable and fluctuating market conditions that marked the COVID-19 pandemic, which have since become more predictable. The reduced magnitude of risk likely reflects these changing conditions as well.
- 13. The Partnership's proprietary Unsubsidized Affordable Housing Risk Model, like the Unsubsidized Affordable Housing Risk Index before it, is derived from a number of factors, including neighborhood-level economic and demographic conditions as well as property-level building characteristics. The Risk Model is a logistic regression where every independent variable is statistically significant and provides an Area Under the Curve (AUC) of about .74. A selection of the literature consulted in developing the Model's risk factors includes: Goldstein, Ira, et al. "Maybe It Really Does Take a Village: Supporting the Creation of High-Quality Unsubsidized Affordable Rental Housing in Legacy Cities (Working Paper)." Reinvestment Fund, 2019; HR&A Advisors and National Housing Trust. "Preserving Affordable Housing the City of San Diego." San Diego Housing Commission, May 2020; Kling, Steve et al. "NOAH Risk Analysis: What, Where, Who, and When." The Preservation Compact. Assessed May 2022; Schreiber, Matt. "Proactive Preservation of Unsubsidized Affordable Housing in Emerging Markets: Lessons from Atlanta, Cleveland, and Philadelphia." Joint Center for Housing Studies of Harvard University, NeighborWorks America, March 2018; "California Estimated Displacement Risk Model" and "Displacement Typology Map", Urban Displacement Project, 2022 and 2018.
- 14. Southern California includes Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura Counties; the Bay Area includes Alameda, Contra Costa, Marin, Napa, San Francisco, San Mateo, Santa Clara, Solano, and Sonoma Counties; San Joaquin Valley includes Fresno, Kern, Kings, Madera, Merced, San Joaquin, Stanislaus, and Tulare Counties; Greater Sacramento includes El Dorado, Placer, Sacramento, Sutter, Yolo, and Yuba Counties; the Central Coast includes Monterey, San Benito, San Luis Obispo, Santa Barbara, and Santa Cruz Counties; North State includes Butte, Colusa, Del Norte, Glenn, Humboldt, Lake, Lassen, Mendocino, Modoc, Nevada, Sierra, Plumas, Shasta, Siskiyou, Tehama, and Trinity Counties; the Sierras include Alpine, Amador, Calaveras, Inyo, Mariposa, Mono, and Tuolumne Counties.

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