



REGIONAL HOUSING NEEDS PLAN

CYCLE 6 | JUNE 2022
Public Review Draft

Tulare County Association of Governments

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TULARE COUNTY ASSOCIATION OF GOVERNMENTS

6th Cycle Regional Housing Needs Plan



Public Draft Review
June 2022

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Executive Summary

State housing law assigns the responsibility for preparing the Regional Housing Needs Assessment (RHNA) for the Tulare County region to the Tulare County Association of Governments (TCAG). TCAG, and other California councils of governments (COGs), undertake the RHNA process prior to each housing element cycle. The Regional Housing Needs Plan (RHNP) describes the methodology developed to allocate the region's housing needs in four income categories (very low, low, moderate, and above moderate) among Tulare County's eight cities and the unincorporated county in accordance with the objectives and factors contained in State law.

The RHNA process begins with the RHNA Determination. The California Department of Housing and Community Development (HCD) issues a RHNA Determination to TCAG all other COGs in California to identify housing needs for each region of the state. The TCAG RHNA Determination is the total number of units that the jurisdictions within the Tulare County region must plan for in their housing elements. The Determination, which is divided into four income categories is based on California Department of Finance (DOF) and HCD population projections. HCD provided the Tulare County region a final RHNA Determination of 33,214 housing units on October 21, 2021. The RHNA Determination covers a planning period from June 30, 2023, through December 31, 2031.

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The RHNA process (Government Code Section 65584 et seq.) requires TCAG to develop and adopt a methodology for allocating a portion of the RHNA Determination to each jurisdiction within the Tulare County region. Prior to adoption of the RHNA Methodology, TCAG staff consulted the Regional Housing Needs Advisory Committee which is comprised of representatives from each of the jurisdictions in the county, a building and development advocate and an affordable housing advocate (Self-Help Enterprises). Together, TCAG staff, the Regional Housing Needs Advisory Committee, and the TCAG Board considered different methodologies to allocate a portion of the RHNA Determination to each jurisdiction.

The RHNA Methodology (Methodology A – Regional Income Parity by 2046) was approved by the TCAG Board of Governors on December 6, 2021. An underlying principle of the RHNA Methodology is to ensure that affordable housing is equitably distributed throughout the region. The Methodology applies an adjustment factor based on disparities in household income across the TCAG region. The adjustment factor assigns a higher proportion of units affordable to lower income households to jurisdictions that currently have a lower proportion of affordable households compared to the regional average and assigns a lower proportion of affordable units to jurisdictions that currently have a higher proportion of affordable households than the regional average. The Methodology is intended to help the region achieve income parity (the same proportion of affordable units in each community) by 2046. Table 1 summarizes the overall allocation of units to each jurisdiction and the allocation by the four income categories. The RHNA Methodology is described in more detail in Section III.

Following adoption of the RHNA, each jurisdiction in the county must update its housing element consistent with the 2023-2031 RHNA and submit it to HCD for certification. The housing element must demonstrate that

Tulare County Regional Housing Needs Advisory Committee

Crystal Flores

City of Dinuba

Lisa Wallis-Dutra

City of Exeter & City of Farmersville

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City of Lindsay

Jason Ridenour - Vice Chair

City of Porterville

Mike Miller

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Nick Mascia, City of Visalia

Rebecca Griswold

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Building/Development

Betsy McGovern-Garcia - Chair

Affordable Housing Advocate

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6TH CYCLE REGIONAL HOUSING NEEDS PLAN

adequate sites and zoning are available during the planning period to accommodate the RHNA for all income categories. HCD reviews each jurisdiction's housing element for compliance with State law.

Table 1 – Final Allocation by Income Tier

| Final Allocation by Income Tier | | | | | | | | | | | |
|---------------------------------|-----------------------|---|-----------------------|-----------------------|-----------------------|-----------------------|-----------------------|----------------------------|-----------------------|----------------------------------|-----------------------|
| | Total RHNA Allocation | Affordable Allocation (Combined Low + Very Low Income) | | Low Income Allocation | | Low Income Allocation | | Moderate Income Allocation | | Above Moderate Income Allocation | |
| | Units | Units | Percent of Total RHNA | Units | Percent of Total RHNA | Units | Percent of Total RHNA | Units | Percent of Total RHNA | Units | Percent of Total RHNA |
| Dinuba | 1,588 | 625 | 39.4% | 387 | 24.4% | 238 | 15.0% | 268 | 16.9% | 695 | 43.8% |
| Exeter | 844 | 318 | 37.7% | 197 | 23.3% | 121 | 14.3% | 146 | 17.3% | 380 | 45.0% |
| Farmersville | 654 | 218 | 33.3% | 135 | 20.6% | 83 | 12.7% | 121 | 18.5% | 315 | 48.2% |
| Lindsay | 789 | 151 | 19.1% | 93 | 11.8% | 58 | 7.4% | 178 | 22.6% | 460 | 58.3% |
| Porterville | 4,064 | 1,409 | 34.7% | 872 | 21.5% | 537 | 13.2% | 739 | 18.2% | 1,916 | 47.1% |
| Tulare | 4,749 | 2,319 | 48.8% | 1,435 | 30.2% | 884 | 18.6% | 677 | 14.3% | 1,753 | 36.9% |
| Visalia | 10,791 | 6,047 | 56.0% | 3,741 | 34.7% | 2,306 | 21.4% | 1,321 | 12.2% | 3,423 | 31.7% |
| Woodlake | 492 | 122 | 24.8% | 75 | 15.2% | 47 | 9.6% | 103 | 20.9% | 267 | 54.3% |
| Unincorporated County | 9,243 | 2,526 | 27.3% | 1,563 | 16.9% | 963 | 10.4% | 1,870 | 20.2% | 4,847 | 52.4% |
| Total | 33,214 | 13,735 | 41.4% | 8,497 | 25.6% | 5,238 | 15.8% | 5,424 | 16.3% | 14,055 | 42.3% |

Note: Percentages may not sum to 100 percent due to rounding

Source: TCAG 2022

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SECTION I: INTRODUCTION

Overview of State Law, Regulatory Requirements, and the RHNA Process

State housing law assigns the responsibility for preparing the Regional Housing Needs Assessment (RHNA) for the Tulare County region to the Tulare County Association of Governments (TCAG). TCAG and other California councils of governments (COGs), undertake the RHNA process prior to each housing element cycle. The current RHNA is for the sixth housing element cycle and covers an 8.5-year projection period (June 30, 2023 – December 31, 2031).

The RHNA process for the Tulare County region was initiated in September 2020 and is anticipated to be completed in August 2022 with the adoption of the Regional Housing Needs Plan (RHNP). The RHNP describes the methodology developed to allocate the region's housing needs in four income categories (very low, low, moderate, and above moderate) among the eight cities and the unincorporated county.

RHNA Factors and Objectives

Factors

State law requires that the following factors to be evaluated and considered where appropriate when developing the methodology per Government Code Section 65584.04(e).

- 1) Existing and projected jobs and housing relationship, particularly low-wage jobs and affordable housing
- 2) Lack of capacity for sewer or water service due to decisions outside jurisdiction's control
- 3) Availability of land suitable for urban development
- 4) Lands protected from urban development under existing federal or state programs
- 5) County policies to preserve prime agricultural land
- 6) Distribution of household growth in the Regional Transportation Plan (RTP) and opportunities to maximize use of transit and existing transportation infrastructure

- 7) Agreements to direct growth toward incorporated areas
- 8) Loss of deed-restricted affordable units
- 9) Households paying more than 30 percent and more than 50 percent of their income in rent
- 10) The rate of overcrowding
- 11) Housing needs of farmworkers
- 12) Housing needs generated by a university within the jurisdiction
- 13) Housing needs of individuals and families experiencing homelessness
- 14) Units lost during a state of emergency that have yet to be replaced
- 15) The region's greenhouse gas (GHG) emissions targets

Objectives

California Government Code Section 65584(d) identifies the following five objectives that adopted allocation methodology must further:

- 1) Increasing the housing supply and the mix of housing types, tenure, and affordability in all cities and counties within the region in an equitable manner, which shall result in each jurisdiction receiving an allocation of units for low- and very low-income households.
- 2) Promoting infill development and socioeconomic equity, the protection of environmental and agricultural resources, the encouragement of efficient development patterns, and the achievement of the region's greenhouse gas reductions targets provided by the State Air Resources Board pursuant to Section 65080.
- 3) Promoting an improved intraregional relationship between jobs and housing including an improved balance between the number of low-wage jobs and the number of housing units affordable to low-wage workers in each jurisdiction.
- 4) Allocating a lower proportion of housing need to an income category when a jurisdiction already has a disproportionately high share of households in that income category, as compared to the countywide distribution of households in that category from the most recent American Community Survey.

- 5) Affirmatively furthering fair housing. For purposes of this section, “affirmatively furthering fair housing” means 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. Specifically, affirmatively furthering fair housing means taking meaningful actions that, taken together, address significant disparities in housing needs and in access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws.

Affirmatively furthering fair housing (AFFH) is a new required objective that was added for the 6th cycle the RHNA methodology.

Regional Housing Needs Allocation Determination

The RHNP assigns each jurisdiction part of the RHNA Determination, issued by HCD. The TCAG RHNA Determination is the total number of housing units that the jurisdictions within the Tulare County region must collectively plan to accommodate between June 30, 2023, and December 31, 2031. The RHNA Determination, which is divided into four income categories, is based on California Department of Finance (DOF) and HCD population projections. Table 2 shows the breakdown of the RHNA Determination by the four income categories.

Table 2 – Total RHNA Determination

| Table 2: Total RHNA Determination by Income Category | | |
|--|---------------|---------------|
| Income Category | Housing Units | Percent |
| Very Low | 8,497 | 25.6% |
| Low | 5,238 | 15.8% |
| Moderate | 5,424 | 16.3% |
| Above Moderate | 14,055 | 42.3% |
| Total | 33,214 | 100.0% |

Source: California Department of Housing and Community Development

Organization

The RHNA is organized into three sections:

Section I: Introduction, which provides background information, overview of State law and regulations, the objectives and factors for the RHNA, and the RHNA determination

Section II: The RHNA Process

Section III. Adopted RHNA Methodology and Allocation, which provides a detailed description of the adopted RHNA Methodology

The appendices include the RHNA Methodology, the survey sent to the jurisdictions and a summary of the results, the Regional Housing Needs Determination Letter from HCD, documents related to the development of the RHNA Methodology, and California Government Code Section 65584.

SECTION II: THE RHNA PROCESS

The 6th Cycle RHNA methodology was informed by input from stakeholders and developed in close coordination with the Regional Housing Needs Advisory Committee, with consultation with HCD, and with oversight from the TCAG Board of Governors.

Determination from HCD

The RHNA process began in September 2020 when TCAG began working with HCD regarding the RHNA Determination. In May 2021 HCD provided TCAG a draft RHNA Determination. On October 27, 2021, HCD provided a final RHNA Determination of 33,214 housing units for the 8.5 RHNA period. (See Appendix 2 for HCD determination letter to TCAG)

Jurisdiction Survey

In February 2021, an initial data request and survey was sent to each jurisdiction in conjunction with the Regional Transportation Plan (RTP) data request and survey. In April 2021, a follow-up survey was sent to each jurisdiction to identify additional data and information that could inform the objectives that the RHNA is required to advance and/or the factors required for consideration when developing the RHNA methodology to the extent that sufficient data is available.

The results of the survey were discussed at subsequent Regional Housing Needs Advisory committee meetings. A copy of the survey and a summary of the survey results are included in Appendix 3.

Regional Housing Needs Advisory Committee

The Regional Housing Needs Advisory Committee consisted of a representative from each of the jurisdictions, a building and development representative and an affordable housing advocate (Self-Help Enterprises). The representative from Self-Help Enterprises was selected as the chair of the Regional Housing Needs Advisory committee.

The Committee met on November 19, 2020, March 25, 2021, April 22, 2021, June 24, 2021, September 23, 2021, October 28, 2021. During the meetings, the committee reviewed the process and goals of the RHNA and engaged in thoughtful discussions regarding the survey results and of the RHNA methodology.

At the October 28, 2021 committee meeting, the committee unanimously recommended Methodology A -Regional Income Parity by 2046 for adoption.

TCAG Board of Governors

The TCAG Board of Governors is comprised of one representative from each of the eight cities, the five members of the County Board of Supervisors, and three members-at-large. Board members and the members of the public were given opportunities to review, comment, and ask questions about the RHNA Determination and Methodology.

State law requires TCAG to release the Proposed RHNA Methodology for public review and comment period. The comment period gives the public and each jurisdiction an opportunity to provide comments on the RHNA Methodology. The public review and comment period for the TCAG Proposed RHNA Methodology ran for 30 days from December 6, 2021, to January 6, 2022. The TCAG Board of Governors approved and adopted the RHNA Methodology at their December 6, 2021, meeting subject to receiving no additional comments during the 30-day review period. No additional comments were received. Based on the adopted RHNA Methodology, TCAG is releasing the RHNA Allocations as a part of this document, the Draft Regional Housing Needs Plan (RHNP). State law establishes that if any jurisdiction proposes a revision to the RHNA Allocations, TCAG “shall accept the proposed revision, modify its earlier determination, or indicate based upon available data and accepted planning methodology, why the proposed revision is inconsistent with the regional housing need.” If after 45 days no revisions are requested, TCAG will adopt the Final RHNP at the August 15, 2022, TCAG Board of Governors meeting.

HCD Review

Pursuant to Government Code Section 65584.04(i), HCD is required to review the draft RHNA Methodology to determine whether it furthers the statutory objectives described in Government Code Section 65584(d). The draft allocation methodology was submitted to HCD on January 24, 2022, for review. On March 24, 2022, HCD completed its review of the methodology and found that the draft RHNA Methodology furthers the statutory objectives described in Government Code 65584(d) (See Appendix 4) HCD’s review includes a detailed analysis of how the draft methodology furthers each of the statutory objectives.

SECTION III: ADOPTED RHNA METHODOLOGY AND ALLOCATIONS

The regional housing determination provided by HCD includes both a total number of housing units and a distribution of those units across four affordability tiers: very low-income, moderate-income, and above-moderate income (see Table 2 above).

RHNA Allocations

The approved methodology uses the following process to distribute the housing units:

Step 1 – Calculate the Total RHNA Allocation by Jurisdiction.

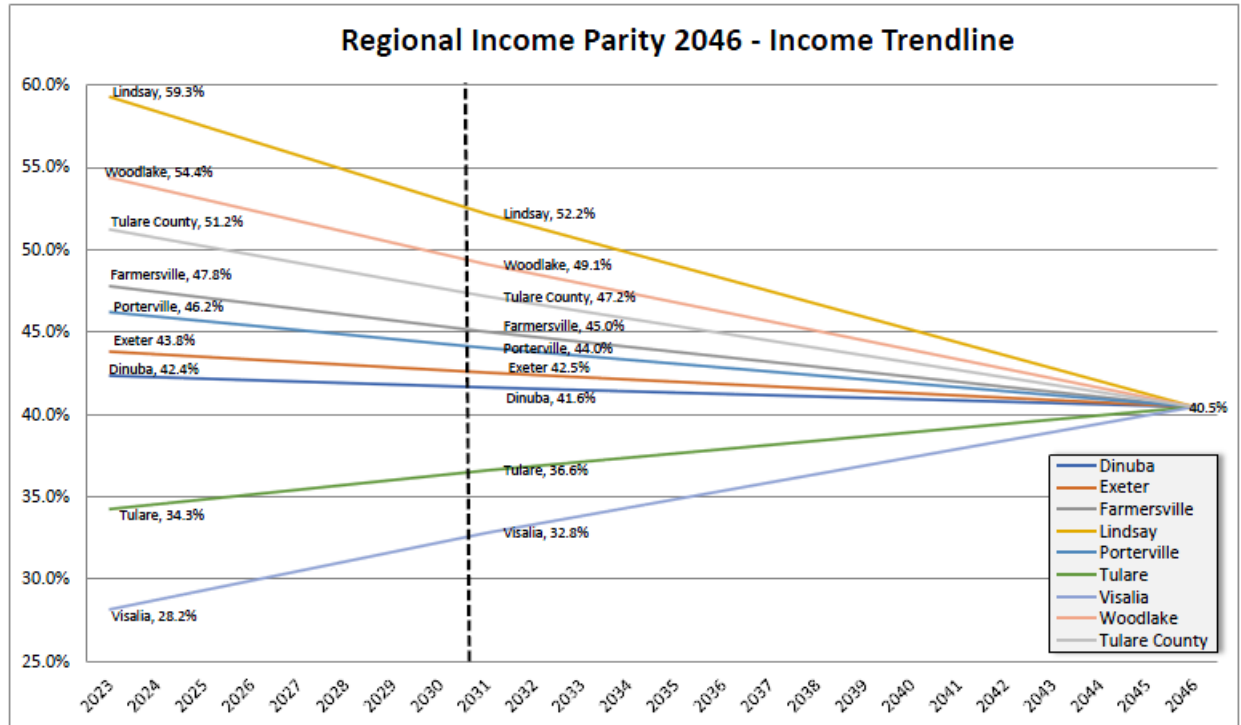
The regional control totals used for the RHNA, RTP, and Sustainable Communities Strategy (SCS) are perfectly consistent and are based upon the DOF/HCD projections for population (within 1.5%) and the exact projection for households. Subregional allocations were based upon the existing 2021 population, housing, jobs distribution within the region consistent with the 2009 Regional Blueprint

Step 2 – Calculate the Affordable RHNA by Jurisdiction

The methodology establishes a trendline for each jurisdiction to determine the percentage of new housing units that must be affordable in order for all jurisdictions to achieve “regional income parity” (i.e., an equal percentage of affordable housing units by a specific future date) (see Figures 2,3, and 4). Jurisdictions that currently have a higher proportion of lower-income households compared to the current regional average, are expected to plan for a lower proportional share of affordable units. Conversely, jurisdictions that currently have a lower share of lower-income households compared to the regional average are expected to plan for a higher percentage of affordable units.

The methodology uses an Income Parity Trendline to assign the number of units necessary for each jurisdiction to be trending towards regional income parity by 2046, the horizon year for the RTP/SCS. See Figure 1 and Table 3 below.

Figure 1 – Regional Income Parity 2046 | Income Trendline



Sources

2023 affordable percentages: 2019 ACS

2046 income parity percentages: 2019 ACS (existing countywide average)

2031 affordable percentages: Calculated using a trendline between 2023 affordable percentage and 2046 income parity percentage

Table 3 – Methodology | Income Parity by 2046

| Methodology - Income Parity by 2046 | | | | | | | | | | | |
|-------------------------------------|-------------------------------|-----------------------------------|-----------------------------------|---|-----------------------|---|-----------------|---|-----------------------------------|------------------|-------------------------------|
| | Total Housing Units June 2023 | Total Housing Units December 2031 | Net New Housing Units (2023-2031) | Existing Percentage of Affordable Units | 2023 Affordable Units | 2031 Intersection of 2046 Income Parity Trendline | Regional Parity | Total Affordable Units in 2031 to Reach Income Parity | 2023 - 2031 Affordable Allocation | | Percent Affordable Allocation |
| | | | | | | | | | Units | Percent of Total | |
| | A | B | C | D | E | F | G | H | I | J | K |
| Dinuba | 7,181 | 8,769 | 1588 | 42.4% | 3041 | 41.64% | 40.5% | 3651 | 625 | 5% | 39.4% |
| Exeter | 3,854 | 4,698 | 844 | 43.8% | 1688 | 42.55% | 40.5% | 1999 | 318 | 2% | 37.7% |
| Farmersville | 2,957 | 3,611 | 654 | 47.8% | 1413 | 45.02% | 40.5% | 1626 | 218 | 2% | 33.3% |
| Lindsay | 3,715 | 4,503 | 789 | 59.3% | 2202 | 52.17% | 40.5% | 2349 | 151 | 1% | 19.1% |
| Porterville | 19,123 | 23,187 | 4064 | 46.2% | 8837 | 44.04% | 40.5% | 10211 | 1409 | 10% | 34.7% |
| Tulare | 22,349 | 27,097 | 4749 | 34.3% | 7655 | 36.60% | 40.5% | 9917 | 2319 | 17% | 48.8% |
| Visalia | 50,729 | 61,521 | 10791 | 28.2% | 14286 | 32.81% | 40.5% | 20183 | 6047 | 44% | 56.0% |
| Woodlake | 2,332 | 2,824 | 492 | 54.4% | 1268 | 49.12% | 40.5% | 1387 | 122 | 1% | 24.8% |
| Unincorporated County | 46,589 | 55,832 | 9243 | 51.2% | 23868 | 47.16% | 40.5% | 26331 | 2526 | 18% | 27.3% |
| Total | 158,828 | 192,043 | 33214 | 40.5% | 64260 | 40.44% | 40.5% | 77655 | 13735 | 100% | 41.4% |

Sources:

Column A: Control totals from TCAG Demographic Forecast

Column B: Control totals from TCAG Demographic Forecast

Column C: Column A subtracted from Column B

Column D: 2019 American Community Survey

Column E: Column A multiplied by Column D

Column F: Calculated using a trendline between Column D and Column G

Column G: 2019 American Community Survey (existing countywide average)

Column H: Column B multiplied by Column F

Column I: Column E subtracted from Column H and then proportionally adjusted to add up to countywide total of 13,735

Column K: Column I divided by Column C

Step 3 – Calculate the Jurisdictional Allocation by Income Tier

The final step is to distribute the remaining income categories proportionately to the allocations assigned to the region from HCD. Affordable allocations are the combination of very low and low which make up 61.9% and 38.1% of the affordable allocation respectively. Non-affordable allocations are the combination of moderate and above moderate which make up 27.8% and 72.2% of the non-affordable allocation respectively. For a detailed explanation of the methodology see Methodology A – Regional Income Parity 2046 in Appendix 1

The final jurisdictional allocation of units across all income tiers is shown in Table 4 below.

Table 4 – Final Jurisdictional Allocation by Income Tier

| <i>Income Parity by 2046</i> | <i>Total RHNA (Net New Housing Units 2023-2031)</i> | <i>Very Low Less than 50%</i> | | <i>Low 50% - 80%</i> | | <i>Moderate 80% - 120%</i> | | <i>Above Moderate Greater than 120%</i> | |
|----------------------------------|---|-----------------------------------|-------|--------------------------|-------|--------------------------------|-------|---|-------|
| Dinuba | 1,588 | 387 | 24.4% | 238 | 15.0% | 268 | 16.9% | 695 | 43.8% |
| Exeter | 844 | 197 | 23.3% | 121 | 14.3% | 146 | 17.3% | 380 | 45.0% |
| Farmersville | 654 | 135 | 20.6% | 83 | 12.7% | 121 | 18.5% | 315 | 48.2% |
| Lindsay | 789 | 93 | 11.8% | 58 | 7.4% | 178 | 22.6% | 460 | 58.3% |
| Porterville | 4,064 | 872 | 21.5% | 537 | 13.2% | 739 | 18.2% | 1,916 | 47.1% |
| Tulare | 4,749 | 1,435 | 30.2 | 884 | 18.6% | 677 | 14.3% | 1,753 | 36.9% |
| Visalia | 10,791 | 3,741 | 34.7% | 2,306 | 21.4% | 1,321 | 12.2% | 3,423 | 31.7% |
| Woodlake | 492 | 75 | 15.2% | 47 | 9.6% | 103 | 20.9% | 267 | 54.3% |
| Unincorporated County | 9,243 | 1,563 | 16.9% | 963 | 10.4% | 1,870 | 20.2% | 4,847 | 52.4 |
| Total | 33,214 | 8,497 | 25.6% | 5,238 | 15.8% | 5,424 | 16.3% | 14,055 | 42.3% |

Statutory Objectives

In compliance with State law, the methodology furthers all statutory objectives as outlined below.

Objective 1: Increasing the housing supply and the mix of housing types, tenure, and affordability in all cities and counties within the region in an equitable manner, which shall result in each jurisdiction receiving an allocation of units for low- and very low-income households.

The methodology for allocating units in each income tier to achieve income parity by 2046 supports an equitable distribution of units such that the jurisdictions that currently have a lesser share of low- and very low-income units receive a larger allocation. The methodology allocates units in all four income tiers to each of the region's jurisdictions.

Objective 2: Promoting infill development and socioeconomic equity, the protection of environmental and agricultural resources, the encouragement of efficient development patterns and the achievement of the region's greenhouse gas reductions targets provided by the State Air Resources Board pursuant to Section 65080.

The methodology places the majority of the units in incorporated cities while still balancing the county's ability to invest in its disadvantaged unincorporated communities. The methodology is able to achieve this and by its incorporation in the RTP/SCS supports its ability to achieve regional GHG emission reduction targets.

Objective 3: Promoting an improved intraregional relationship between jobs and housing, including an improved balance between the number of low-wage jobs and the number of housing units affordable to low-wage workers in each jurisdiction.

The distribution of housing and jobs for the RTP/SCS was based upon the 2009 Regional Blueprint that sought to achieve livable walkable communities through a greater jobs housing balance and increased residential densities to support investments in transit and active transportation. The 2022 RTP/SCS goes even further and was designed to implement the RHNA and provide for Environmental Justice by introducing Cross-Valley Corridor affordable transit-oriented development with ATP enhancements at station locations and augmented by micro-transit for rural communities.

The 2022 RTP/SCS builds upon recent community planning efforts that plan and invest in all communities to improve the quality of life for residents. Housing, jobs, schools, parks, trails, and other transportation amenities are planned for in the RTP/SCS. The 2022 RTP/SCS allocates over 2/3 of the growth forecast to the relatively low vehicle miles traveled (VMT) areas of three (3) largest cities and within their respective spheres of influence where the largest job centers in the region are located. The region is also home to one of the most productive agricultural counties in the country and that workers in that industry tend to live in unincorporated communities near farms and processing plants.

The regional control totals used for the RHNA and RTP/SCS are perfectly consistent and are based upon the DOF/HCD projections for population (within 1.5%) and the exact projection for households.

Objective 4: Allocating a lower proportion of housing need to an income category when a jurisdiction already has a disproportionately high share of households in that income category, as compared to the countywide distribution of households in that category from the most recent American Community Survey.

TCAG addresses this objective by focusing the methodology's distribution of affordable units on achieving regional income parity by 2046. The jurisdictions with the lowest proportions of very low- and low-income households received the highest proportions of affordable housing units and the jurisdictions with the highest proportion of very low- and low-income households received the lowest proportion of affordable housing units.

Objective 5: Affirmatively furthering fair housing.

The methodology affirmatively furthers fair housing by allocating a higher proportion of very low- and low-income units to jurisdictions that have fewer low-income households

and by setting forth a path to achieve income parity by 2046 across the county. This methodology addresses significant disparities in housing needs and in access to opportunity and integrates rather than concentrates areas of poverty into areas of opportunity throughout the region.

APPENDICES

1. RHNA Methodology
2. Regional Housing Needs Determination Letter
3. Housing Opportunities and Constraints Survey and Summary
4. RHNA Methodology Consistency Determination Letter
5. California Government Code Section 65584

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APPENDIX 1

RHNA Methodology