

SIXTH CYCLE

**REGIONAL
HOUSING
NEEDS
PLAN**



Fresno Council of
Governments

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PREPARED FOR:



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SIXTH CYCLE REGIONAL HOUSING NEEDS ALLOCATION PLAN

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EXECUTIVE SUMMARY

California Government Code requires each local jurisdiction to plan to accommodate its share of the state’s housing need. The Regional Housing Needs Allocation, or RHNA, is the process outlined in State law for determining the number of housing units in each of four affordability tiers (very low-, low-, moderate-, and above moderate-income) to assign each jurisdiction in a region for the eight-year RHNA cycle.

The RHNA process generally begins with the issuance of a Regional Housing Needs Determination (Regional Determination) from the California Department of Housing and Community Development (HCD), which assigns the number of housing units in each income tier to a region for the RHNA cycle, meant to equal the number of housing units needed to address a region’s existing and projected housing need over the eight-year period. The region’s council of governments is then responsible for developing a methodology to distribute the Regional Determination among all jurisdictions in the region and describing the methodology in an adopted RHNA Plan. The methodology must further five objectives and incorporate a series of factors in its development, as detailed in State law. These objectives and factors primarily serve to further fair housing goals, overcome historical income segregation patterns, and reduce environmental impacts by directing new units in relatively job-rich and high-amenity areas. Finally, local

jurisdictions are responsible for accommodating the assigned units in the housing element of their general plan.

The Fresno Council of Governments (Fresno COG) represents the 16 local jurisdictions in Fresno County: 15 cities and County of Fresno. For this sixth cycle RHNA—the housing projection period beginning June 30, 2023, and ending December 31, 2031—the Fresno COG region received a Regional Determination of 58,298 units. In accordance with State law, Fresno COG prepared a methodology to distribute the units assigned to the region, which considers all required factors and advances the statutory objectives. The methodology was developed under the leadership of the Fresno COG committee structure with technical guidance from a RHNA Subcommittee composed of 20 members and input from community members and stakeholders. The RHNA Plan identifies the number of units by income affordability level that must be planned for in each Fresno COG member jurisdiction’s sixth cycle housing element.

This RHNA Plan outlines the Fresno COG region’s approach to addressing the region’s housing need over the eight-year sixth RHNA cycle, describing the methodology and its development process and outcomes. **Table 1** shows the housing need allocation for all jurisdictions in Fresno County, using the adopted methodology.



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TABLE 1 DISTRIBUTION OF HOUSING NEED BY JURISDICTION BY INCOME TIER

Jurisdiction	Very Low		Low		Moderate		Above Moderate		Total Housing Units
	%	Housing Units	%	Housing Units	%	Housing Units	%	Housing Units	
Clovis	32.6%	2,926	17.3%	1,549	16.1%	1,448	34.0%	3,054	8,977
Coalinga	27.7%	157	17.0%	96	15.7%	89	39.6%	224	566
Firebaugh	23.0%	102	10.4%	46	14.9%	66	51.7%	229	443
Fowler	27.7%	94	16.8%	57	13.9%	47	41.6%	141	339
Fresno	25.6%	9,440	16.0%	5,884	15.3%	5,638	43.1%	15,904	36,866
Huron	14.1%	45	14.1%	45	17.2%	55	54.5%	174	319
Kerman	26.8%	285	12.6%	134	15.8%	168	44.8%	476	1,063
Kingsburg	28.1%	248	18.3%	161	17.0%	150	36.6%	323	882
Mendota	20.1%	129	10.6%	68	15.1%	97	54.2%	348	642
Orange Cove	14.1%	66	10.4%	49	18.3%	86	57.1%	268	469
Parlier	20.1%	147	12.8%	94	14.7%	108	52.4%	384	733
Reedley	27.5%	403	12.5%	183	14.4%	211	45.5%	666	1,463
Sanger	27.6%	412	12.9%	193	16.4%	245	43.1%	644	1,494
San Joaquin	19.5%	39	14.0%	28	18.0%	36	48.5%	97	200
Selma	26.3%	393	11.1%	165	15.6%	233	47.0%	701	1,492
Unincorporated County	30.0%	706	16.6%	391	15.7%	370	37.6%	883	2,350
HCD Requirement	26.7%	15,592	15.7%	9,143	15.5%	9,047	42.1%	24,516	58,298

1. INTRODUCTION

1.1 Overview of California State Law and the RHNA Process

Since 1969, California has required that all local governments (cities, towns, and counties) adequately plan to meet the housing needs of everyone in the community within the housing element of the jurisdiction’s general plan. A central goal of RHNA is to meet the housing needs of people at all income levels through effective planning at the State, regional, and local levels. Councils of governments, like Fresno COG, play a fundamental role in the process.

The following describes the RHNA process and the respective duties at the State, regional, and local levels:

1. HCD Provides a Regional Determination

HCD calculates the regional housing needs assessment, segmented into four income affordability tiers, to accommodate projected growth in the region in addition to existing housing need. The determination is largely based on regional projections of new household growth from the California Department of Finance (DOF) and consultation with the local council of governments, in this case Fresno COG.

2. Fresno COG Develops Allocation Methodology

Once HCD provides the region with a regional determination of housing need by income affordability tier, the council of governments coordinates with its member jurisdictions to develop a methodology for allocating the regional determination by income level among the region’s jurisdictions.

3. Local Jurisdictions Adopt Housing Element Policies Based on RHNA Allocations

Once local jurisdictions receive their allocation of units by income level, they must update the housing element of their general plans to accommodate their respective allocations over the eight-year RHNA cycle. When a housing element is complete, it is submitted to HCD for certification and confirmation that it meets all legal requirements and will accommodate the assigned RHNA.

1.2 RHNA Objectives, Factors, and Regulatory Requirements

The role of Fresno COG and other regional planning agencies in the RHNA, as described in California Government Code Section 65584.04, is to “develop, in consultation with the department [HCD], a proposed methodology for distributing the existing and projected regional housing needs to cities...and counties within the region...” While Fresno COG is ultimately responsible for shaping the overall methodology used to allocate the regional housing needs determination and can use considerable discretion when doing so, the allocation methodology must further a set of objectives and consider specified factors established by State law.



Objectives

Section 65584(d) of California Government Code identifies the following five objectives that the 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 California Air Resources Board pursuant to Section 65080 for the Sustainable Communities Strategy
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, which for the purposes of this process 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

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areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws.

Section 4, *Methodology*, of this plan details how these objectives are furthered by Fresno COG's adopted methodology for the sixth cycle RHNA.

Factors

Government Code also specifies a series of factors, which are specific considerations that must be evaluated when developing the allocation methodology and incorporated in the methodology where appropriate. There are 15 factors the methodology must consider, outlined in Government Code Section 65584.04 and summarized as follows:

1. Lack of capacity for sewer or water service due to decisions outside jurisdiction's control.
2. Availability of land suitable for urban development.
3. Lands protected from urban development under existing federal or state programs.
4. County policies to preserve prime agricultural land.
5. Distribution of household growth in the Regional Transportation Plan (RTP) and opportunities to maximize use of transit and existing transportation infrastructure.
6. Jurisdictional agreements to direct growth to incorporated areas.
7. Loss of deed-restricted affordable units.
8. Housing needs of farmworkers.
9. Housing needs generated by a university within the jurisdiction.
10. Existing and projected jobs and housing relationship, particularly low-wage jobs and affordable housing.
11. Households paying more than 30 percent and more than 50 percent of their income in rent.
12. The rate of overcrowding.
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 targets.

Items 11 through 15 and the clause in item 10 calling for special consideration of the balance between low-wage jobs and affordable housing, are new requirements for the sixth cycle RHNA. All other required factors have been carried forward from the fifth cycle RHNA. The full text in the Government Code is provided in **Appendix 1**.

In addition to these Objectives and Factors, State law requires the housing allocation in the RHNA Plan to distribute housing units in a way that is consistent with the development pattern included in the regional Sustainable Communities Strategy (SCS) in an effort to coordinate and integrate the RHNA with the Regional Transportation Plan (RTP) (§65584.04(m)(1)). In the Fresno COG region, the sixth cycle RHNA Plan must demonstrate consistency with Fresno COG's 2022-2046 RTP/SCS.

1.3 RHNA Plan Organization

The following sections of this plan describe the sixth cycle RHNA process specific to the Fresno COG region:

- **Section 1** provides an overview of State law, RHNA factors and objectives, and the organization of this report.
- **Section 2** details the process by which HCD calculated the sixth cycle Regional Determination for Fresno County.
- **Section 3** details Fresno COG's oversight of the methodology development and public engagement.
- **Section 4** details the adopted methodology with which Fresno COG is allocating the assigned units, segmented by income tier, among each member jurisdiction—the cities of Clovis, Coalinga, Firebaugh, Fowler, Fresno, Huron, Kerman, Kingsburg, Mendota, Orange Cove, Parlier, Reedley, Sanger, San Joaquin, and Selma and the County of Fresno.

2. REGIONAL HOUSING NEEDS DETERMINATION

The final Fresno COG Regional Determination for the sixth cycle RHNA is 58,298 units. The Regional Determination is divided among four affordability tiers, detailed in **Table 2**.

TABLE 2 FRESNO COG REGIONAL DETERMINATION BY INCOME TIER

	Units	Percentage of Total**
Very low*	15,592	26.7%
Low	9,143	15.7%
Moderate	9,047	15.5%
Above Moderate	24,516	42.1%
Total	58,298	100%

*Extremely low-income units are included in the very low-income category, constituting 14% of the total allocation.

**The percent allocations shown are rounded to the nearest tenth of a percent. The number of units in the first column is the exact number allocated through the Regional Determination.

Fresno COG’s RHNA process began with an extensive, 13-month consultation between HCD and Fresno COG staff, from November 2020 through December 2021, covering the methodology, data sources, and timeline for HCD’s determination of the regional housing need. As part of this process, Fresno COG prepared a Comparable Regions Analysis (CRA), presenting alternate inputs to the Regional Determination for average overcrowding and cost burden rates, based on comparable regions rather than national averages. The CRA was accepted by HCD and reflected in the final Regional Determination. The CRA is provided in **Appendix 2**. The full text of the final Regional Determination from HCD is in **Appendix 3**.

The 58,298-unit allocation was calculated by HCD using American Community Survey (ACS) estimates of the current Fresno County population in residential housing (not living in group quarters, such as dorms) and projections of population and household growth developed by Fresno COG and DOF, adjusted based on

the following ACS, CRA, or DOF indicators of current unmet housing need—vacancy rates (ACS), overcrowding rates (CRA), replacement need for decommissioned housing (DOF), occupied units at the start of the RHNA cycle (DOF), and rates of households paying greater than 30 and 50 percent of household income for housing (CRA).

HCD then segmented the assessed regional need into four income affordability tiers based on the area median income (AMI) of the region, derived from ACS household income data, which is \$53,969 for the Fresno COG region. The income affordability tiers are calculated using the following percentages of the Fresno COG region’s median income:

- Very Low Income: 0–50 percent of AMI
- Low Income: 51–80 percent of AMI
- Moderate Income: 81–120 percent of AMI
- Above-Moderate Income: over 120 percent of AMI



3. SIXTH CYCLE RHNA OVERSIGHT AND OUTREACH

The sixth cycle RHNA methodology for the Fresno COG region was informed by input from stakeholders and developed in close coordination with the Fresno COG RHNA Subcommittee, with guidance and oversight from the Fresno COG committee structure—including the Transportation Technical Committee, Policy Advisory Committee, and Policy Board—and in consultation with HCD.

3.1 Community Engagement

Fresno COG staff, in consultation with member jurisdictions, identified stakeholders to engage in the sixth cycle RHNA. On the morning and evening of May 19, 2021, Fresno COG held two RHNA stakeholder workshops to review the process and goals of the RHNA and engage in a thoughtful discussion of the factors to be incorporated into the RHNA methodology. A summary of the workshops is in **Appendix 4**.

3.2 RHNA Subcommittee

The methodology was developed with the guidance of the Fresno COG RHNA Subcommittee, a 20-member advisory committee composed of representatives from each of the 16 Fresno COG member jurisdictions; 3 at-large members representing Fresno Building Industry Association, the Fresno Housing Authority, and Leadership Counsel for Justice and Accountability; and a nonvoting representative from HCD. The RHNA Subcommittee held seven meetings to review data and draft materials, provide critical input on the RHNA methodology, and offer valuable insights and feedback to inform the RHNA throughout its development through direct communications with Fresno COG staff and consultants. In February 2021, RHNA Subcommittee members also supported the development of and provided responses to the member survey included in **Appendix 5**.

RHNA Subcommittee Members

- Dave Merchen, City of Clovis
- Sean Brewer, City of Coalinga
- Karl Schoettler, City of Firebaugh
- Dawn Marple, City of Fowler
- Jennifer Clark, City of Fresno
- Paul Sereno, City of Huron
- Jesus Orozco, City of Kerman
- Holly Owen, City of Kingsburg
- Cristian Gonzales, City of Mendota
- Rudy Hernandez, City of Orange Cove
- Jeff O’Neal, City of Parlier
- Ellen Moore, City of Reedley
- David Brletic, City of Sanger
- Matt Flood, City of San Joaquin
- Fernando Santillan, City of Selma
- Bernard Jimenez, Fresno County
- Mike Prandini, Building Industry Association of Fresno and Madera Counties
- Michael Duarte, Fresno Housing Authority
- Karla Martinez, Leadership Counsel for Justice and Accountability
- California Department of Housing and Community Development

3.3 Fair Housing Survey

Government Code Section 65584.04(b) stipulates that Fresno COG must survey all member jurisdictions for information regarding the required factors, satisfying the requirement to “...review and compile information that will allow the development of a methodology based on the issues, strategies, and actions that are included, as available, in an Analysis of Impediments to Fair Housing Choice or an Assessment of Fair Housing...” Fresno COG and its RHNA Plan consultant, PlaceWorks, conducted a survey of member jurisdictions in February 2021. The results of the survey are included in **Appendix 5**.

3.4 HCD Review

Pursuant to California Government Code Section 65584.04(i), HCD is required to review the Draft Methodology to determine whether it furthers the statutory objectives of RHNA described in Government Code Section 65584(d). On March 14, 2022, Fresno COG submitted the Draft Methodology for 60-day review by HCD. On May 13, 2022, HCD responded, finding that the Draft Methodology furthered the five statutory objectives of RHNA and offering no recommended modifications. The findings letter from HCD is provided as **Appendix 6**.

The Final Methodology, described in Section 4, did not require modification based on HCD's findings, but was revised based on direction from the Fresno COG Policy Board to instate an overall cap to the unincorporated County's RHNA allocation and distribute the remainder to incorporated jurisdictions proportionally (the cap is discussed in section 4.4). Following its approval on July 28, 2022 by the Policy Board, Fresno COG submitted the Final Methodology to HCD on July 29, 2022 for an additional, optional review. On August 25, 2022, HCD responded, finding that the Final Methodology furthered the five statutory objectives of RHNA and offering no recommended modifications. The findings letter from HCD on the adopted methodology is provided as **Appendix 7**.

4. METHODOLOGY

This section describes the adopted methodology to allocate housing units by income level among the Fresno COG member jurisdictions, the process for developing the methodology, and how the methodology addresses the statutory requirements for furthering the five RHNA objectives identified in Government Code Section 65584(d). The methodology consists of two primary

components: the spatial allocation of units to each jurisdiction and the distribution of units by income tier. Following is an overview of the methodology for each component.

4.1 Jurisdictional Allocation

The Fresno COG Regional Determination, established by HCD in consultation with Fresno COG, totals 58,298 housing units. This methodology distributes the allocation across Fresno COG's 16 member jurisdictions in accordance with regional and State goals, priorities, and objectives. To do so, the methodology begins with a base allocation, then adjusts the allocations from the base using five weighted factors.

The base allocation is a starting point that shows the general number of housing units to be assigned to each jurisdiction based on the overall relative sizes of the jurisdictions. In Fresno COG's methodology, the base allocation is derived equally from two data sets:

- Share of existing (2021) population within each jurisdiction (excluding spheres of influence (SOI) and populations living in group quarters).¹
- Share of expected population growth from 2020 to 2050 (including SOIs and excluding population living in group quarters).²

¹ Source: Department of Finance, Table E-5, 2020.

² Source: Fresno COG 2019-2050 Growth Projections, 2020.

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The base allocation of housing units for each jurisdiction is calculated by multiplying each of these two shares by the Regional Determination, dividing the result in half (to apply the 50 percent weight), and summing the two results, as illustrated to the right. The resultant base allocation is shown in **Table 3**.

$$\begin{aligned} & \text{Jurisdiction's share of existing population} \times 58,298 \text{ housing units} \times 0.5 \\ & + \\ & \text{Jurisdiction's share of population growth} \times 58,298 \text{ housing units} \times 0.5 \\ \hline & \text{Jurisdiction's base allocation} \end{aligned}$$

TABLE 3 BASE ALLOCATION

Jurisdiction	Share of Base Allocation Derived from Share of Existing Population (2021) not including SOI	Share of Base Allocation Derived from Share of Regional Population Growth 2020–2050, including SOI	Final Base Allocation: (50% weights applied and result summed)
Clovis*	4,280	3,459	7,739
Coalinga*	385	476	861
Firebaugh*	373	231	604
Fowler*	197	188	385
Fresno*	17,751	15,524	33,275
Huron	183	210	393
Kerman*	565	457	1,022
Kingsburg*	454	372	826
Mendota*	360	353	713
Orange Cove	294	272	566
Parlier*	435	449	884
Reedley*	746	741	1,487
Sanger*	883	776	1,659
San Joaquin*	92	117	209
Selma*	966	695	1,661
Unincorporated County	1,185	4,829	6,014
Total	29,149	29,149	58,298

Sources: Fresno COG 2019-2050 Growth Projections, 2020; California Department of Finance, Table E-5, 2021; PlaceWorks, 2021.

* Due to rounding, the initial total allocations do not sum to the regional determination of 58,298, so the base allocations shown above include adjustments of ±0.5 to some jurisdictions' shares in one or more columns.

The base allocation establishes a foundation of units for each jurisdiction that accounts for the significant size differences between jurisdictions. For example, according to DOF, the most populous city in the region and the fifth most populous city in California, the City of Fresno, has 123 times the population and nearly 200 times more housing units than the least populous jurisdiction in the Fresno COG region, the City of San Joaquin.

The base allocation also incorporates differences in expected future growth between jurisdictions. The 2020–2050 Fresno COG Growth Projections attribute 61 percent of anticipated regional housing growth to the City of Fresno and only 0.31 percent to the City of San Joaquin. Though these jurisdictions are anticipated to experience vast differences in numeric growth, the projections show similar percentage housing unit increases relative to their current numbers, with Fresno expected to grow by 23 percent of the city’s 2020 population and San Joaquin expected to grow by 18 percent of its 2020 population by the year 2050.

4.2 Allocation Factors

Using the base allocation as a foundation, the methodology adjusts each jurisdiction’s allocation using a combination of weighted factors. All factors are configured so that higher scores indicate that the jurisdiction is more favorable to support housing, and lower scores indicate less favorable conditions for housing. For example, jurisdictions with more jobs receive higher scores for regional share of jobs, and jurisdictions with high fire risk receive a lower score for fire risk, resulting in more housing units assigned to jurisdictions with more jobs and lower risk of wildfire.

In preparation for choosing the allocation factors, Fresno COG collected and analyzed more than 30 datasets to assess the following:

- Existing affordable housing stock
- Homelessness
- Housing unit types and tenure
- Housing vacancy

- Current population and the distribution of household growth in the Regional Transportation Plan (the base allocation)
- Cost-burdened households
- Overcrowding
- Vehicle miles traveled
- Transit connectivity
- Jobs (current and projected)
- Jobs-housing balance and jobs-housing fit (lower-wage jobs and affordable housing)
- Opportunity measures
- Childhood poverty status
- Loss of housing units from the Creek Fire
- Wildfire risk
- Flood and erosion hazards
- Groundwater supply
- Designated agricultural land
- Protected and/or sensitive environmental lands (including national and state park and forest land)

After thoughtful consideration spanning multiple meetings of the RHNA Subcommittee data review sessions with jurisdiction representatives, Fresno COG staff, and consultants; and consultation with HCD, Fresno COG selected the factors listed below to adjust the base allocation for each jurisdiction. Each of the factors advances important priorities in the Fresno COG region and statutory objectives of RHNA:

- Percentage of nonvacant housing units in each jurisdiction (relative to each jurisdiction’s total housing stock).
- TCAC Opportunity Score (average score across census geographies within each jurisdiction from the California TCAC (Tax Credit Allocation Committee) Opportunity Maps).
- Regional share of jobs in 2020 (the percentage of jobs in each jurisdiction relative to the entire county).

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- Regional share of projected job growth between 2020 and 2035.
 - Percent of developable or “unconstrained” land, defined as land that is not protected from development due to status as important farmland, sensitive wildlife habitat or wetland, or conservation land, and that is not in areas at high risk of environmental hazards, including flooding, wildfire, erosion, and earthquakes.
1. It supports ease of computation and comparison of factors among each other.
 2. The range of the scale (0.5 to 1.5) is large enough to impact the distribution of housing units by adjusting them up (any score between 1 and 1.5) or down (any score between 0.5 and 1) from the base allocation, but not so large that the base allocation loses its value.

To use the selected factors to assign housing units, each factor is normalized on a scale of 0.5 to 1.5. The normalized scale serves two purposes:

Each factor and its scaled score by jurisdiction are shown in **Table 4** and described in more detail below.

TABLE 4 FACTORS AND NORMALIZED SCORES

Jurisdiction	Non-vacant Units	HCD/TCAC Opportunity Score	Regional Share of Current Jobs (2020)	Regional Share of Projected Job Growth (2020–2035)	Percentage of Unconstrained Land
Clovis	1.17	1.50	0.64	0.67	1.33
Coalinga	0.50	0.68	0.51	0.51	0.95
Firebaugh	1.23	0.62	0.50	0.51	0.72
Fowler	1.14	0.83	0.51	0.52	1.45
Fresno	1.10	0.80	1.50	1.50	1.13
Huron	1.07	0.50	0.50	0.51	0.69
Kerman	1.50	0.81	0.51	0.53	1.45
Kingsburg	1.50	1.03	0.51	0.52	1.50
Mendota	1.30	0.65	0.50	0.50	1.08
Orange Cove	0.99	0.88	0.50	0.50	1.17
Parlier	1.05	0.57	0.51	0.51	1.21
Reedley	1.29	0.89	0.52	0.53	1.38
Sanger	1.18	0.67	0.52	0.52	1.37
San Joaquin	1.03	0.84	0.50	0.50	1.21
Selma	1.14	0.67	0.52	0.54	1.43
Unincorporated County	1.43	0.90	0.79	0.75	0.50

See below for source details for each data set.



Nonvacant Units

The percentage of units in each jurisdiction that are not vacant, resulting in a higher allocation to jurisdictions that currently have lower vacancy rates. This factor represents an indicator of housing need in each jurisdiction and comes from the DOF, Table E-5, for the year 2020.

TCAC Opportunity Score

The California Tax Credit Allocation Committee (TCAC) Opportunity Map scoring factor supports the State's goal to affirmatively further fair housing by facilitating the development of affordable housing in high opportunity / high amenity areas. TCAC opportunity scores are calculated at the census tract level (for urban areas) and the block group level (for rural areas) using 21 indicators: income, adult educational attainment, labor force participation, job proximity, median home value, 12 environmental health/pollution indicators, 4th-grade math proficiency, 4th-grade reading proficiency, high school graduation rate, and students living above the federal poverty level.

TCAC scores for each jurisdiction are calculated by taking the average 2021 TCAC scores across all tracts/block groups in each jurisdiction. Where a census geography crosses the boundary of multiple jurisdictions, a proportionate share of the TCAC index score was added to each jurisdiction's average score.

Jobs: Current and Projected

Allocating more housing to jurisdictions with higher concentrations of jobs can alleviate housing demand pressure in job-rich areas while reducing regional vehicle miles traveled (VMT) and associated greenhouse gas (GHG) emissions because of long commutes to and from work. Both current regional shares of jobs and regional shares of expected job growth are included in the methodology to allocate more housing where jobs are currently concentrated and where job growth is expected. Current jobs data were sourced from the California Employment Development Department (EDD, 2020), and job projections were sourced from Fresno COG Growth Forecasts (2021).

Unconstrained Land

Fresno County is one of the most productive agricultural regions in the world, producing nearly eight billion dollars of agricultural products in 2019. Fresno County is also home to several national and state parks and national forests, including Sierra National Forest, Sequoia National Forest, and Kings Canyon National Park. The unconstrained land factor was included in the methodology to allocate more housing to jurisdictions with greater shares of land suitable for housing development, which excludes important farmland, conservation land and biological resources, and land with high risk of environmental hazards.

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The percentage of unconstrained land (relative to each jurisdiction’s total acreage) is the percent of acreage in each jurisdiction that is not constrained by one or more of the following factors:

- Land designated as important farmland by the California Department of Conservation’s Farmland Mapping and Monitoring Program (FMMP), which includes the following categories:
 - » Prime farmland, unique farmland, farmland of statewide or local importance, and grazing land.
- Land registered as “Williamson Act” land by Fresno County, that is, parcels designated for agricultural use or related open space use under the Williamson Act, or California Land Conservation Act of 1965.
- Land designated for conservation or that is biologically sensitive. This includes wetlands (from the National Wetlands Inventory or NWI), any land within a state park or national park or forest, and land that is designated “critical habitat” by the California Natural Diversity Database (CNDDB).
- Land within areas with the following environmental hazard risk designations:
 - » Wildfire: high and very-high wildfire risk areas, based on CAL FIRE’s Fire and Resource Assessment Program designations.
 - » Flooding: 100-year and 500-year flood zones based on FEMA’s National Flood Hazard Layer.
 - » Soil Erosion: Moderate and severe soil erosion risk areas based on the US Department of Agriculture’s Soil Survey Geographic database.
 - » Earthquakes, based on fault location data and Alquist-Priolo zones from the US Geological Survey.

The acreage of constrained land is subtracted from the total acreage of land in each jurisdiction to obtain the unconstrained land factor, and jurisdictions with higher percentages of unconstrained land (relative to their total acreage) are allocated more housing.

4.3 Factor Weighting

Following selection of the factors, Fresno COG and the RHNA Subcommittee assigned weights to each factor for use in the methodology. These weights establish what percentage of the total RHNA is distributed to each jurisdiction based on each factor. All selected factor weights are listed below. **Table 5** shows the resulting factor-adjusted allocations for each jurisdiction.

- Percent of non-vacant housing units: 35 percent
- TCAC Opportunity score: 20 percent
- Regional share of jobs in 2020: 12.5 percent
- Regional share of projected job growth between 2020 and 2035: 12.5 percent
- Percentage of unconstrained land: 20 percent

TABLE 5 BASE ALLOCATION AND FACTOR ADJUSTMENT

Jurisdiction	Base Allocation	Factor-Adjusted Allocation	Net Change
Clovis	7,739	8,759	1,020
Coalinga	861	552	(309)
Firebaugh	604	432	(172)
Fowler	385	331	(54)
Fresno	33,275	35,972	2,697
Huron	393	311	(82)
Kerman	1,022	1,037	15
Kingsburg	826	861	35
Mendota	713	626	(87)
Orange Cove	566	458	(108)
Parlier	884	715	(169)
Reedley	1,487	1,428	(59)
Sanger	1,659	1,458	(201)
San Joaquin	209	195	(14)
Selma	1,661	1,456	(205)
Unincorporated County	6,014	3,707	(2,307)
Total	58,298	58,298	-

4.4 County Cap

While the RHNA methodology must be factor driven, State law allows the allocation to the unincorporated county to be reduced manually or capped at a certain number of units to support the statutory RHNA objectives that promote infill development and an improved jobs-housing balance, protect agricultural resources, and achieve a reduction in GHG emissions.

At the direction of the Policy Board, the Methodology includes a county allocation cap of 2,350 units. The cap was set in recognition of both the relevant statutory objectives and the preferred Sustainable Communities Strategy scenario selected by Fresno COG’s Policy Board in October 2021, which directs growth to urban centers to reduce VMT and GHG emissions. The 2,350-unit cap results in the redistribution of 1,357 units from the initial, factor-adjusted allocation, among the 15 incorporated jurisdictions. Redistribution of the 1,357 units is done in proportion to each incorporated jurisdiction’s share of the total regional allocation (58,298), less the County’s initial allocation of 3,707 units (54,591 units). For example, the City of Clovis’ share of the regional total allocation less the County’s was 16.04 percent (8,759/54,591); therefore, 16.04 percent was multiplied by the 1,357 units to be redistributed, resulting in an additional allocation of 218 units for the City of Clovis. **Table 6** shows the revised allocation and change from the initial allocation.



TABLE 6 REVISED ALLOCATION WITH COUNTY CAP

Jurisdiction	Initial Factor-Adjusted Allocation	Revised Allocation with County Cap of 2,350 Units	Change
Clovis	8,759	8,977	218
Coalinga	552	566	14
Firebaugh	432	443	11
Fowler	331	339	8
Fresno	35,972*	36,866*	894
Huron	311	319	8
Kerman	1,037	1,063	26
Kingsburg	861	882	21
Mendota	626	642	16
Orange Cove	458	469	11
Parlier	715	733	18
Reedley	1,428	1,463	35
Sanger	1,458	1,494	36
San Joaquin	195	200	5
Selma	1,456	1,492	36
Unincorporated County	3,707	2,350	(1,357)
Total	58,298	58,298	-

*Note: Due to rounding, the initial factor-adjusted methodology results in a regional sum allocation of 58,301 units (3 more units than the regional determination of 58,298), so 3 units are subtracted from the City of Fresno’s allocation, since the City has the largest share of units.

4.5 Income Allocation Methodology

The Regional Determination provided by HCD includes both a total number of housing units and a distribution of those housing units across four affordability tiers: very low-income, low-income, moderate-income, and above moderate-income, as shown in **Table 2**. Once the overall

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allocation for each jurisdiction is finalized, each jurisdiction's housing unit allocation must be distributed among the four income tiers, and the sum allocation in each income tier across all jurisdictions must equal the total amount for the region established by HCD.

This methodology uses the Income-Shift approach to distribute units by income tier to each jurisdiction. The Income-Shift approach distributes the total unit allocation for each jurisdiction (calculated in the previous step) between the four income tiers based on the relationship between the percentage of units in the income tier of the Regional Determination and each jurisdiction's existing share of units in the income tier. The adjustment factor determines the extent to which each jurisdiction's allocation of units by income tier will match the distribution of the Regional Determination or move all jurisdictions toward a more even distribution of units by income tier overall. An adjustment factor of 100 percent would result in all jurisdictions' allocation by income tier being equal to the percent distribution of the Regional Determination of that tier (e.g., 26.7 percent of each jurisdiction's allocation would be for the very low-income tier, equal to the 26.7 percent of units assigned to the region as very low-income). As the adjustment factor increases, each jurisdiction's allocation of units by income tier changes, depending on how much higher or

lower the jurisdiction's existing distribution of units in that income tier is compared to the Regional Determination. For example, the Regional Determination in the low-income tier is 15.7 percent. A jurisdiction with only 11 percent of existing units in the low-income tier would receive an allocation greater than 15.7 percent, and a jurisdiction with an existing distribution of 35 percent of units in the low-income tier would receive an allocation lower than 15.7 percent. HCD recommends the adjustment factor be set at a minimum of 150 percent.

Fresno COG, following the guidance of the RHNA Subcommittee, selected an Income-Shift adjustment factor of 150 percent. The resultant distribution of units across all income tiers—the Fresno COG sixth cycle RHNA—is shown in **Table 7**.

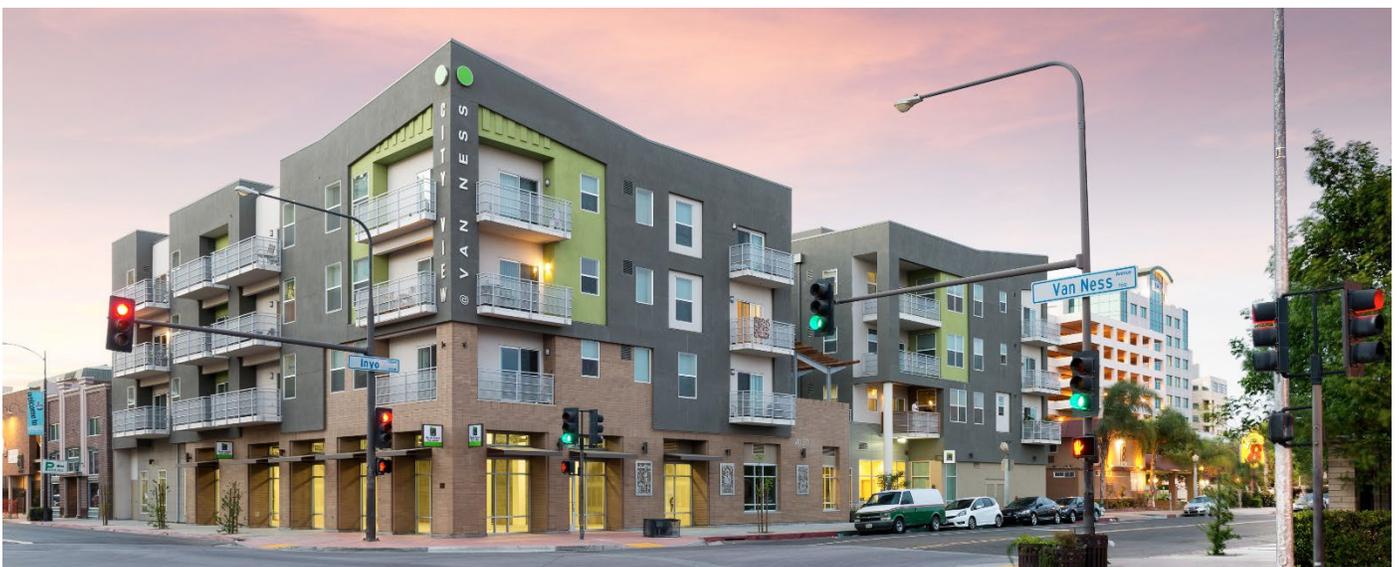


TABLE 7 DISTRIBUTION BY JURISDICTION BY INCOME TIER

Jurisdiction	Very Low		Low		Moderate		Above Moderate		Total Housing Units
	%	Housing Units	%	Housing Units	%	Housing Units	%	Housing Units	
Clovis	32.6%	2,926	17.3%	1,549	16.1%	1,448	34.0%	3,054	8,977
Coalinga	27.7%	157	17.0%	96	15.7%	89	39.6%	224	566
Firebaugh*	23.0%	102	10.4%	46	14.9%	66	51.7%	229	443
Fowler	27.7%	94	16.8%	57	13.9%	47	41.6%	141	339
Fresno*	25.6%	9,440	16.0%	5,884	15.3%	5,638	43.1%	15,904	36,866
Huron*	14.1%	45	14.1%	45	17.2%	55	54.5%	174	319
Kerman*	26.8%	285	12.6%	134	15.8%	168	44.8%	476	1,063
Kingsburg	28.1%	248	18.3%	161	17.0%	150	36.6%	323	882
Mendota*	20.1%	129	10.6%	68	15.1%	97	54.2%	348	642
Orange Cove*	14.1%	66	10.4%	49	18.3%	86	57.1%	268	469
Parlier*	20.1%	147	12.8%	94	14.7%	108	52.4%	384	733
Reedley*	27.5%	403	12.5%	183	14.4%	211	45.5%	666	1,463
Sanger*	27.6%	412	12.9%	193	16.4%	245	43.1%	644	1,494
San Joaquin*	19.5%	39	14.0%	28	18.0%	36	48.5%	97	200
Selma*	26.3%	393	11.1%	165	15.6%	233	47.0%	701	1,492
Unincorporated County	30.0%	706	16.6%	391	15.7%	370	37.6%	883	2,350
HCD Requirement	26.7%	15,592	15.7%	9,143	15.5%	9,047	42.1%	24,516	58,298

* The initial Income-Shift adjustment results in a discrepancy between the Regional Determination by income tier and the sum of allocations by income tier. To address this, Fresno COG made manual adjustments that resulted in reduced allocations of the very low- and/or low-income tiers for jurisdictions with an existing share of units in these income tiers that is greater than the Regional Determination and corresponding increases to those jurisdiction's allocations in the moderate- and above moderate-income tiers.

Additional manual adjustments (of ±1.0) were made to address discrepancies with the total allocation and the sum allocations by income tier resulting from rounding in previous steps.

4.6 Statutory Objectives

Following 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 in the region in an equitable manner, which shall result in each jurisdiction receiving an allocation of units for low- and very low-income households.

As described above, the distribution of units overall follows a data-driven process informed by regional priorities and statutory objectives to co-locate housing where there is need (35 percent weighting for the nonvacant units factor), opportunity (20 percent weighting for TCAC Opportunity Score factor), jobs (25 percent combined weighting for existing and future jobs factor), and land suitable for development (20 percent weighting for the unconstrained lands factor). Further, the methodology for allocating units in each income tier supports a redistribution of units, so that jurisdictions that currently have a lesser share of

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low- and very low-income units receive a larger share of units in those income tiers. The methodology allocates units in all four income tiers to each of the region's 16 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 of California Government Code.

The methodology incorporates the Fresno COG Growth Forecast used in the Regional Transportation Plan as the base allocation, which further supports consistency of the methodology with planning efforts to achieve regional GHG emission reduction targets by distributing RHNA units to areas expected to grow in population.

Additionally, the methodology's 20 percent weight placed on the unconstrained lands factor, in addition to the 2,350-unit cap on the unincorporated county's allocation, allocates the preponderance of units to incorporated, urbanized municipalities and away from the unincorporated county, which constitutes 97 percent of Fresno County's total land acreage, of which only 8 percent is unconstrained. Allocating housing units to incorporated areas with existing public services and infrastructure supports infill and socioeconomic equity

and protects environmental and agricultural resources located primarily in the unincorporated county.

Finally, the combined 25 percent weight on the two jobs factors encourages efficient development patterns by locating housing near current job centers and in areas where jobs are expected to grow, supporting efforts to reduce VMT and GHG emissions.

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.

A typical target relationship between the number of jobs and the number of housing units is between 1.3 and 1.6 jobs for every housing unit. Only the City of Fresno has achieved this balance, although multiple jurisdictions (and the countywide average) are only slightly under this ideal range, and the City of Kerman is slightly over this ideal range. In general, most jurisdictions in the region have an excess of housing units compared to jobs. Existing jobs and housing data are shown in **Table 8**.



TABLE 8 JOBS-HOUSING BALANCE

Jurisdiction	Total Jobs	Total Housing Units	Jobs-Housing Balance
Clovis	35,252	38,664	0.91
Coalinga	3,590	4,721	0.76
Firebaugh	1,557	2,151	0.72
Fowler	2,583	2,143	1.21
Fresno	236,014	178,831	1.32
Huron	239	1,812	0.13
Kerman	7,069	3,983	1.77
Kingsburg	4,774	4,077	1.17
Mendota	1,523	2,965	0.51
Orange Cove	770	2,834	0.27
Parlier	2,848	4,158	0.68
Reedley	9,401	7,333	1.28
Sanger	8,287	7,396	1.12
San Joaquin	698	1,043	0.67
Selma	6,682	7,511	0.89
Unincorporated County	59,710	61,520	0.97
County Total	380,997	331,142	1.15

Sources: ACS, 2019 (for housing estimates); Longitudinal Employer-Household Dynamics (LEHD) Survey, 2019 (for jobs estimates).

The methodology furthers the Jobs-Housing Balance RHNA Objective by including both current jobs and expected job growth as allocation factors at a combined 25 percent weight (12.5 percent each), thereby directing more housing units to jurisdictions with more existing and projected jobs so as not to exacerbate the imbalance of jobs to housing units. The methodology allocates more units, relative to the base allocations, to three of the six jurisdictions with a current jobs-housing balance above 1.0 (the cities of Fresno, Kerman, and Kingsburg), therefore allocating more housing units to jurisdictions with more jobs. These three jurisdictions have higher TCAC scores than most others in the region, making them especially appropriate candidates for the addition of housing units based on job availability. The other jurisdictions with a current jobs-housing balance above 1.0 (the cities of Fowler, Reedley, and Sanger) do not receive greater allocations compared to their base due

to the stronger impact of the nonvacant units, TCAC, and unconstrained lands factors, which serve the other statutory objectives. Further, except the City of Clovis, all jurisdictions with a current jobs-housing balance below 1.0 are allocated fewer units compared to their base allocations. Though Clovis has a smaller share of jobs relative to housing units, the city's allocation increases from the base in support of other objectives, especially objective 5.

Table 9 shows the same relationship between lower-wage jobs (those earning less than \$3,333 per month) and housing units affordable at the low- and very low-income affordability thresholds, referred to as the "jobs-housing fit."

TABLE 9 JOBS-HOUSING FIT

Jurisdiction	Total Low-Wage Jobs (<\$3,333/mo)	Total Housing Units (<80% AMI)	Jobs-Housing Fit
Clovis	22,824	10,250	2.23
Coalinga	1,561	1,626	0.96
Firebaugh	951	1,225	0.78
Fowler	1,911	800	2.39
Fresno	139,457	73,970	1.89
Huron	176	1,183	0.15
Kerman	5,584	1,795	3.11
Kingsburg	3,154	1,377	2.29
Mendota	1,114	1,812	0.61
Orange Cove	540	2,050	0.26
Parlier	1,805	2,286	0.79
Reedley	6,953	3,156	2.20
Sanger	5,706	3,108	1.84
San Joaquin	312	569	0.55
Selma	4,756	3,563	1.33
Unincorporated County	36,536	17,741	2.06
County Total	233,340	126,511	1.84

Source: ACS, 2019 (for housing estimates); Longitudinal Employer-Household Dynamics (LEHD) Survey, 2019 (for jobs estimates).

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The cities of Clovis, Fowler, Fresno, Kerman, Kingsburg, Reedley, and Sanger and the unincorporated county all have higher ratios of lower-income jobs compared to affordable housing units than the upper limit of the ideal range of 1.3 to 1.6 jobs per housing unit. The methodology supports an improved jobs-housing fit by directing more housing units overall and/or a greater share of low- and/or very low-income units to these jurisdictions, as summarized below:

- More RHNA units are allocated overall to three of the jurisdictions with the poorest existing jobs-housing fit—Clovis, Kerman, and Kingsburg—compared to their base allocations, which are derived from existing and projected population.
- A greater share of units in the very low-income tier than the Regional Determination is allocated to the cities of Clovis, Fowler, Kerman, Kingsburg, Reedley, and Sanger and to the unincorporated county.
- A greater share of units in the low-income tier than the Regional Determination is allocated to the cities of Clovis, Fowler, Fresno, and Kingsburg and the unincorporated county.

The methodology does not result in a greater allocation of units overall *and* greater share of units in the low- and very low-income categories for *all* jurisdictions with identified jobs-housing fit imbalances because of conflicts between this objective and objectives 2 and 5, pertaining to promoting infill and agricultural preservation and affirmatively furthering fair housing.

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.

The methodology's Income-Shift approach to distributing housing units by income tier allocates a smaller proportion of housing units by income tier to jurisdictions whose existing share of units in that tier is

larger than the Regional Determination's share. Similarly, the methodology allocates a larger proportion of units by income category to jurisdictions whose existing share of units in that income tier is smaller than the Regional Determination's share. As a result, all jurisdictions are assigned housing units by each income tier at levels that would move their share of units by income tier closer to the regional average once constructed.

Objective 5. Affirmatively furthering fair housing.

This methodology supports the objective of affirmatively furthering fair housing by incorporating the TCAC Opportunity Score as a factor. Jurisdictions with a higher average TCAC score are allocated more low- and very low-income units because these areas are considered to be more amenity rich and with higher opportunity overall for low-income residents.

Furthermore, the methodology results in 18 percent of low- and very low-income housing units allocated to the City of Clovis, which offers the greatest opportunity in the Fresno COG region by a significant margin, as defined by the HCD/TCAC Opportunity Maps. Clovis is one of five jurisdictions in the county to achieve a positive TCAC score (0.59) when the TCAC Opportunity Map scores for census block groups and tracts are averaged for each jurisdiction. Other positive average TCAC scores range between 0.04 and 0.18. All other jurisdictions scored at or below zero. Thus, the placement of a preponderance of units in the City of Clovis is a strong step toward affirmatively furthering fair housing in the Fresno COG region. **Table 10** shows the average TCAC scores alongside the normalized TCAC factor score (also shown in **Table 4**).



**TABLE 10 TCAC OPPORTUNITY SCORE
AVERAGE BY JURISDICTION**

Jurisdiction	Average TCAC Score	TCAC Normalized Score
Clovis	0.59	1.50
Coalinga	-0.14	0.68
Firebaugh	-0.19	0.62
Fowler	0.00	0.83
Fresno	-0.03	0.80
Huron	-0.29	0.50
Kerman	-0.02	0.81
Kingsburg	0.18	1.03
Mendota	-0.16	0.65
Orange Cove	0.04	0.88
Parlier	-0.24	0.57
Reedley	0.05	0.89
Sanger	-0.14	0.67
San Joaquin	0.00	0.84
Selma	-0.15	0.67
Unincorporated County	0.06	0.90

Source: California Tax Credit Allocation Committee, 2021
Opportunity Area Maps, 2021; PlaceWorks, 2021.

APPENDICES

1. Excerpts from California Government Code Section 65584
2. Comparable Regions Analysis
3. Final Regional Housing Need Determination Letter
4. Stakeholder Workshops Summary
5. Fair Housing Survey Results and Full Text
6. HCD Review of Draft RHNA Methodology
7. HCD Review of Adopted RHNA Methodology

APPENDIX 1

Excerpts from California Government Code Section
65584

GOVERNMENT CODE - GOV

TITLE 7. PLANNING AND LAND USE [65000 - 66499.58]

(Heading of Title 7 amended by Stats. 1974, Ch. 1536.)

DIVISION 1. PLANNING AND ZONING [65000 - 66301]

(Heading of Division 1 added by Stats. 1974, Ch. 1536.)

CHAPTER 3. Local Planning [65100 - 65763]

(Chapter 3 repealed and added by Stats. 1965, Ch. 1880.)

ARTICLE 10.6. Housing Elements [65580 - 65589.11]

(Article 10.6 added by Stats. 1980, Ch. 1143.)

[65584.](#)

(a) (1) For the fourth and subsequent revisions of the housing element pursuant to Section 65588, the department shall determine the existing and projected need for housing for each region pursuant to this article. For purposes of subdivision (a) of Section 65583, the share of a city or county of the regional housing need shall include that share of the housing need of persons at all income levels within the area significantly affected by the general plan of the city or county.

(2) It is the intent of the Legislature that cities, counties, and cities and counties should undertake all necessary actions to encourage, promote, and facilitate the development of housing to accommodate the entire regional housing need, and reasonable actions should be taken by local and regional governments to ensure that future housing production meets, at a minimum, the regional housing need established for planning purposes. These actions shall include applicable reforms and incentives in Section 65582.1.

(3) The Legislature finds and declares that insufficient housing in job centers hinders the state's environmental quality and runs counter to the state's environmental goals. In particular, when Californians seeking affordable housing are forced to drive longer distances to work, an increased amount of greenhouse gases and other pollutants is released and puts in jeopardy the achievement of the state's climate goals, as established pursuant to Section 38566 of the Health and Safety Code, and clean air goals.

(b) The department, in consultation with each council of governments, shall determine each region's existing and projected housing need pursuant to Section 65584.01 at least two years prior to the scheduled revision required pursuant to Section 65588. The appropriate council of governments, or for cities and counties without a council of governments, the department, shall adopt a final regional housing need plan that allocates a share of the regional housing need to each city, county, or city and county at least one year prior to the scheduled revision for the region required by Section 65588. The allocation plan prepared by a council of governments shall be prepared pursuant to Sections 65584.04 and 65584.05.

(c) Notwithstanding any other provision of law, the due dates for the determinations of the department or for the council of governments, respectively, regarding the regional housing need may be extended by the department by not more than 60 days if the extension will enable access to more recent critical population or housing data from a pending or recent release of the United States Census Bureau or the Department of Finance. If the due date for the determination of the department or the council of governments is extended for this reason, the department shall extend the corresponding housing element revision deadline pursuant to Section 65588 by not more than 60 days.

(d) The regional housing needs allocation plan shall further all of the following objectives:

- (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.
- (e) 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.
- (f) For purposes of this section, "household income levels" are as determined by the department as of the most recent American Community Survey pursuant to the following code sections:
- (1) Very low incomes as defined by Section 50105 of the Health and Safety Code.
 - (2) Lower incomes, as defined by Section 50079.5 of the Health and Safety Code.
 - (3) Moderate incomes, as defined by Section 50093 of the Health and Safety Code.
 - (4) Above moderate incomes are those exceeding the moderate-income level of Section 50093 of the Health and Safety Code.
- (g) Notwithstanding any other provision of law, determinations made by the department, a council of governments, or a city or county pursuant to this section or Section 65584.01, 65584.02, 65584.03, 65584.04, 65584.05, 65584.06, 65584.07, or 65584.08 are exempt from the California Environmental Quality Act (Division 13 (commencing with Section 21000) of the Public Resources Code).
(Amended by Stats. 2018, Ch. 989, Sec. 1.5. (AB 1771) Effective January 1, 2019.)

[65584.01.](#)

For the fourth and subsequent revision of the housing element pursuant to Section 65588, the department, in consultation with each council of governments, where applicable, shall determine the existing and projected need for housing for each region in the following manner:

- (a) The department's determination shall be based upon population projections produced by the Department of Finance and regional population forecasts used in preparing regional transportation plans, in consultation with each council of governments. If the total regional population forecast for the projection year, developed by the council of governments and used for the preparation of the regional transportation plan, is within a range of 1.5 percent of the total regional population forecast for the projection year by the Department of Finance, then the population forecast developed by the council of governments shall be the basis from which the department determines the existing and projected need

for housing in the region. If the difference between the total population projected by the council of governments and the total population projected for the region by the Department of Finance is greater than 1.5 percent, then the department and the council of governments shall meet to discuss variances in methodology used for population projections and seek agreement on a population projection for the region to be used as a basis for determining the existing and projected housing need for the region. If agreement is not reached, then the population projection for the region shall be the population projection for the region prepared by the Department of Finance as may be modified by the department as a result of discussions with the council of governments.

(b) (1) At least 26 months prior to the scheduled revision pursuant to Section 65588 and prior to developing the existing and projected housing need for a region, the department shall meet and consult with the council of governments regarding the assumptions and methodology to be used by the department to determine the region's housing needs. The council of governments shall provide data assumptions from the council's projections, including, if available, the following data for the region:

(A) Anticipated household growth associated with projected population increases.

(B) Household size data and trends in household size.

(C) The percentage of households that are overcrowded and the overcrowding rate for a comparable housing market. For purposes of this subparagraph:

(i) The term "overcrowded" means more than one resident per room in each room in a dwelling.

(ii) The term "overcrowding rate for a comparable housing market" means that the overcrowding rate is no more than the average overcrowding rate in comparable regions throughout the nation, as determined by the council of governments.

(D) The rate of household formation, or headship rates, based on age, gender, ethnicity, or other established demographic measures.

(E) The vacancy rates in existing housing stock, and the vacancy rates for healthy housing market functioning and regional mobility, as well as housing replacement needs. For purposes of this subparagraph, the vacancy rate for a healthy rental housing market shall be considered no less than 5 percent.

(F) Other characteristics of the composition of the projected population.

(G) The relationship between jobs and housing, including any imbalance between jobs and housing.

(H) The percentage of households that are cost burdened and the rate of housing cost burden for a healthy housing market. For the purposes of this subparagraph:

(i) The term "cost burdened" means the share of very low, low-, moderate-, and above moderate-income households that are paying more than 30 percent of household income on housing costs.

(ii) The term "rate of housing cost burden for a healthy housing market" means that the rate of households that are cost burdened is no more than the average rate of households that are cost burdened in comparable regions throughout the nation, as determined by the council of governments.

(I) The loss of units during a state of emergency that was declared by the Governor pursuant to the California Emergency Services Act (Chapter 7 (commencing with Section 8550) of Division 1 of Title 2), during the planning period immediately preceding the relevant revision pursuant to Section 65588 that have yet to be rebuilt or replaced at the time of the data request.

(2) The department may accept or reject the information provided by the council of governments or modify its own assumptions or methodology based on this information. After consultation with the council of governments, the department shall make determinations in writing on the assumptions for each of the factors listed in subparagraphs (A) to (I), inclusive, of paragraph (1) and the methodology it shall use and shall provide these determinations to the council of governments. The methodology submitted by the department may make adjustments based on the region's total projected households, which includes existing households as well as projected households.

(c) (1) After consultation with the council of governments, the department shall make a determination of the region's existing and projected housing need based upon the assumptions and methodology determined pursuant to subdivision (b). The region's existing and projected housing need shall reflect the achievement of a feasible balance between jobs and housing within the region using the regional employment projections in the applicable regional transportation plan. Within 30 days following notice of the determination from the department, the council of governments may file an objection to the department's determination of the region's existing and projected housing need with the department.

(2) The objection shall be based on and substantiate either of the following:

(A) The department failed to base its determination on the population projection for the region established pursuant to subdivision (a), and shall identify the population projection which the council of governments believes should instead be used for the determination and explain the basis for its rationale.

(B) The regional housing need determined by the department is not a reasonable application of the methodology and assumptions determined pursuant to subdivision (b). The objection shall include a proposed alternative determination of its regional housing need based upon the determinations made in subdivision (b), including analysis of why the proposed alternative would be a more reasonable application of the methodology and assumptions determined pursuant to subdivision (b).

(3) If a council of governments files an objection pursuant to this subdivision and includes with the objection a proposed alternative determination of its regional housing need, it shall also include documentation of its basis for the alternative determination. Within 45 days of receiving an objection filed pursuant to this section, the department shall consider the objection and make a final written determination of the region's existing and projected housing need that includes an explanation of the information upon which the determination was made.

(d) Statutory changes enacted after the date the department issued a final determination pursuant to this section shall not be a basis for a revision of the final determination.

(Amended by Stats. 2019, Ch. 497, Sec. 146. (AB 991) Effective January 1, 2020.)

[65584.02.](#)

(a) For the fourth and subsequent revisions of the housing element pursuant to Section 65588, the existing and projected need for housing may be determined for each region by the department as follows, as an alternative to the process pursuant to Section 65584.01:

(1) In a region in which at least one subregion has accepted delegated authority pursuant to Section 65584.03, the region's housing need shall be determined at least 26 months prior to the housing element update deadline pursuant to Section 65588. In a region in which no subregion has accepted delegation pursuant to Section 65584.03, the region's housing need shall be determined at least 24 months prior to the housing element deadline.

(2) At least six months prior to the department's determination of regional housing need pursuant to paragraph (1), a council of governments may request the use of population and household forecast assumptions used in the regional transportation plan. This request shall include all of the following:

(A) Proposed data and assumptions for factors contributing to housing need beyond household growth identified in the forecast. These factors shall include allowance for vacant or replacement units, and may include other adjustment factors.

(B) A proposed planning period that is not longer than the period of time covered by the regional transportation improvement plan or plans of the region pursuant to Section 14527, but a period not less than five years, and not longer than six years.

(C) A comparison between the population and household assumptions used for the Regional Transportation Plan with population and household estimates and projections of the Department of Finance.

(b) The department shall consult with the council of governments regarding requests submitted pursuant to paragraph (2) of subdivision (a). The department may seek advice and consult with the Demographic Research Unit of the Department of Finance, the State Department of Transportation, a representative of a contiguous council of governments, and any other party as deemed necessary. The department may request that the council of governments revise data, assumptions, or methodology to be used for the determination of regional housing need, or may reject the request submitted pursuant to paragraph (2) of subdivision (a). Subsequent to consultation with the council of governments, the department will respond in writing to requests submitted pursuant to paragraph (1) of subdivision (a).

(c) If the council of governments does not submit a request pursuant to subdivision (a), or if the department rejects the request of the council of governments, the determination for the region shall be made pursuant to Sections 65584 and 65584.01.

(Amended by Stats. 2008, Ch. 728, Sec. 9. Effective January 1, 2009.)

65584.03.

(a) At least 28 months prior to the scheduled housing element update required by Section 65588, at least two or more cities and a county, or counties, may form a subregional entity for the purpose of allocation of the subregion's existing and projected need for housing among its members in accordance with the allocation methodology established pursuant to Section 65584.04. The purpose of establishing a subregion shall be to recognize the community of interest and mutual challenges and opportunities for providing housing within a subregion. A subregion formed pursuant to this section may include a single county and each of the cities in that county or any other combination of geographically contiguous local governments and shall be approved by the adoption of a resolution by each of the local governments in the subregion as well as by the council of governments. All decisions of the subregion shall be approved by vote as provided for in rules adopted by the local governments comprising the subregion or shall be approved by vote of the county or counties, if any, and the majority of the cities with the majority of population within a county or counties.

(b) Upon formation of the subregional entity, the entity shall notify the council of governments of this formation. If the council of governments has not received notification from an eligible subregional entity at least 28 months prior to the scheduled housing element update required by Section 65588, the council of governments shall implement the provisions of Sections 65584 and 65584.04. The delegate subregion and the council of governments shall enter into an agreement that sets forth the process, timing, and other terms and conditions of the delegation of responsibility by the council of governments to the subregion.

(c) At least 25 months prior to the scheduled revision, the council of governments shall determine the share of regional housing need assigned to each delegate subregion. The share or shares allocated to the delegate subregion or subregions by a council of governments shall be in a proportion consistent with the distribution of households assumed for the comparable time period of the applicable regional transportation plan. Prior to allocating the regional housing needs to any delegate subregion or subregions, the council of governments shall hold at least one public hearing, and may consider requests for revision of the proposed allocation to a subregion. If a proposed revision is rejected, the council of governments shall respond with a written explanation of why the proposed revised share has not been accepted.

(d) Each delegate subregion shall fully allocate its share of the regional housing need to local governments within its subregion. If a delegate subregion fails to complete the regional housing need

allocation process among its member jurisdictions in a manner consistent with this article and with the delegation agreement between the subregion and the council of governments, the allocations to member jurisdictions shall be made by the council of governments.

(Added by Stats. 2004, Ch. 696, Sec. 6. Effective January 1, 2005.)

65584.04.

(a) At least two years before a scheduled revision required by Section 65588, each council of governments, or delegate subregion as applicable, shall develop, in consultation with the department, a proposed methodology for distributing the existing and projected regional housing need to cities, counties, and cities and counties within the region or within the subregion, where applicable pursuant to this section. The methodology shall further the objectives listed in subdivision (d) of Section 65584.

(b) (1) No more than six months before the development of a proposed methodology for distributing the existing and projected housing need, each council of governments shall survey each of its member jurisdictions to request, at a minimum, information regarding the factors listed in subdivision (e) that will allow the development of a methodology based upon the factors established in subdivision (e).

(2) With respect to the objective in paragraph (5) of subdivision (d) of Section 65584, the survey shall review and compile information that will allow the development of a methodology based upon the issues, strategies, and actions that are included, as available, in an Analysis of Impediments to Fair Housing Choice or an Assessment of Fair Housing completed by any city or county or the department that covers communities within the area served by the council of governments, and in housing elements adopted pursuant to this article by cities and counties within the area served by the council of governments.

(3) The council of governments shall seek to obtain the information in a manner and format that is comparable throughout the region and utilize readily available data to the extent possible.

(4) The information provided by a local government pursuant to this section shall be used, to the extent possible, by the council of governments, or delegate subregion as applicable, as source information for the methodology developed pursuant to this section. The survey shall state that none of the information received may be used as a basis for reducing the total housing need established for the region pursuant to Section 65584.01.

(5) If the council of governments fails to conduct a survey pursuant to this subdivision, a city, county, or city and county may submit information related to the items listed in subdivision (e) before the public comment period provided for in subdivision (d).

(c) The council of governments shall electronically report the results of the survey of fair housing issues, strategies, and actions compiled pursuant to paragraph (2) of subdivision (b). The report shall describe common themes and effective strategies employed by cities and counties within the area served by the council of governments, including common themes and effective strategies around avoiding the displacement of lower income households. The council of governments shall also identify significant barriers to affirmatively furthering fair housing at the regional level and may recommend strategies or actions to overcome those barriers. A council of governments or metropolitan planning organization, as appropriate, may use this information for any other purpose, including publication within a regional transportation plan adopted pursuant to Section 65080 or to inform the land use assumptions that are applied in the development of a regional transportation plan.

(d) Public participation and access shall be required in the development of the methodology and in the process of drafting and adoption of the allocation of the regional housing needs. Participation by organizations other than local jurisdictions and councils of governments shall be solicited in a diligent effort to achieve public participation of all economic segments of the community as well as members of protected classes under Section 12955. The proposed methodology, along with any relevant underlying

data and assumptions, an explanation of how information about local government conditions gathered pursuant to subdivision (b) has been used to develop the proposed methodology, how each of the factors listed in subdivision (e) is incorporated into the methodology, and how the proposed methodology furthers the objectives listed in subdivision (e) of Section 65584, shall be distributed to all cities, counties, any subregions, and members of the public who have made a written or electronic request for the proposed methodology and published on the council of governments', or delegate subregion's, internet website. The council of governments, or delegate subregion, as applicable, shall conduct at least one public hearing to receive oral and written comments on the proposed methodology.

(e) To the extent that sufficient data is available from local governments pursuant to subdivision (b) or other sources, each council of governments, or delegate subregion as applicable, shall include the following factors to develop the methodology that allocates regional housing needs:

(1) Each member jurisdiction's existing and projected jobs and housing relationship. This shall include an estimate based on readily available data on the number of low-wage jobs within the jurisdiction and how many housing units within the jurisdiction are affordable to low-wage workers as well as an estimate based on readily available data, of projected job growth and projected household growth by income level within each member jurisdiction during the planning period.

(2) The opportunities and constraints to development of additional housing in each member jurisdiction, including all of the following:

(A) Lack of capacity for sewer or water service due to federal or state laws, regulations or regulatory actions, or supply and distribution decisions made by a sewer or water service provider other than the local jurisdiction that preclude the jurisdiction from providing necessary infrastructure for additional development during the planning period.

(B) The availability of land suitable for urban development or for conversion to residential use, the availability of underutilized land, and opportunities for infill development and increased residential densities. The council of governments may not limit its consideration of suitable housing sites or land suitable for urban development to existing zoning ordinances and land use restrictions of a locality, but shall consider the potential for increased residential development under alternative zoning ordinances and land use restrictions. The determination of available land suitable for urban development may exclude lands where the Federal Emergency Management Agency (FEMA) or the Department of Water Resources has determined that the flood management infrastructure designed to protect that land is not adequate to avoid the risk of flooding.

(C) Lands preserved or protected from urban development under existing federal or state programs, or both, designed to protect open space, farmland, environmental habitats, and natural resources on a long-term basis, including land zoned or designated for agricultural protection or preservation that is subject to a local ballot measure that was approved by the voters of that jurisdiction that prohibits or restricts conversion to nonagricultural uses.

(D) County policies to preserve prime agricultural land, as defined pursuant to Section 56064, within an unincorporated area and land within an unincorporated area zoned or designated for agricultural protection or preservation that is subject to a local ballot measure that was approved by the voters of that jurisdiction that prohibits or restricts its conversion to nonagricultural uses.

(3) The distribution of household growth assumed for purposes of a comparable period of regional transportation plans and opportunities to maximize the use of public transportation and existing transportation infrastructure.

(4) Agreements between a county and cities in a county to direct growth toward incorporated areas of the county and land within an unincorporated area zoned or designated for agricultural protection or preservation that is subject to a local ballot measure that was approved by the voters of the jurisdiction that prohibits or restricts conversion to nonagricultural uses.

- (5) The loss of units contained in assisted housing developments, as defined in paragraph (9) of subdivision (a) of Section 65583, that changed to non-low-income use through mortgage prepayment, subsidy contract expirations, or termination of use restrictions.
- (6) The percentage of existing households at each of the income levels listed in subdivision (e) of Section 65584 that are paying more than 30 percent and more than 50 percent of their income in rent.
- (7) The rate of overcrowding.
- (8) The housing needs of farmworkers.
- (9) The housing needs generated by the presence of a private university or a campus of the California State University or the University of California within any member jurisdiction.
- (10) The housing needs of individuals and families experiencing homelessness. If a council of governments has surveyed each of its member jurisdictions pursuant to subdivision (b) on or before January 1, 2020, this paragraph shall apply only to the development of methodologies for the seventh and subsequent revisions of the housing element.
- (11) The loss of units during a state of emergency that was declared by the Governor pursuant to the California Emergency Services Act (Chapter 7 (commencing with Section 8550) of Division 1 of Title 2), during the planning period immediately preceding the relevant revision pursuant to Section 65588 that have yet to be rebuilt or replaced at the time of the analysis.
- (12) The region's greenhouse gas emissions targets provided by the State Air Resources Board pursuant to Section 65080.
- (13) Any other factors adopted by the council of governments, that further the objectives listed in subdivision (d) of Section 65584, provided that the council of governments specifies which of the objectives each additional factor is necessary to further. The council of governments may include additional factors unrelated to furthering the objectives listed in subdivision (d) of Section 65584 so long as the additional factors do not undermine the objectives listed in subdivision (d) of Section 65584 and are applied equally across all household income levels as described in subdivision (f) of Section 65584 and the council of governments makes a finding that the factor is necessary to address significant health and safety conditions.
- (f) The council of governments, or delegate subregion, as applicable, shall explain in writing how each of the factors described in subdivision (e) was incorporated into the methodology and how the methodology furthers the objectives listed in subdivision (d) of Section 65584. The methodology may include numerical weighting. This information, and any other supporting materials used in determining the methodology, shall be posted on the council of governments', or delegate subregion's, internet website.
- (g) The following criteria shall not be a justification for a determination or a reduction in a jurisdiction's share of the regional housing need:
- (1) Any ordinance, policy, voter-approved measure, or standard of a city or county that directly or indirectly limits the number of residential building permits issued by a city or county.
 - (2) Prior underproduction of housing in a city or county from the previous regional housing need allocation, as determined by each jurisdiction's annual production report submitted pursuant to subparagraph (H) of paragraph (2) of subdivision (a) of Section 65400.
 - (3) Stable population numbers in a city or county from the previous regional housing needs cycle.
- (h) Following the conclusion of the public comment period described in subdivision (d) on the proposed allocation methodology, and after making any revisions deemed appropriate by the council of governments, or delegate subregion, as applicable, as a result of comments received during the public comment period, and as a result of consultation with the department, each council of governments, or delegate subregion, as applicable, shall publish a draft allocation methodology on its internet website and submit the draft allocation methodology, along with the information required pursuant to subdivision (e), to the department.

(i) Within 60 days, the department shall review the draft allocation methodology and report its written findings to the council of governments, or delegate subregion, as applicable. In its written findings the department shall determine whether the methodology furthers the objectives listed in subdivision (d) of Section 65584. If the department determines that the methodology is not consistent with subdivision (d) of Section 65584, the council of governments, or delegate subregion, as applicable, shall take one of the following actions:

(1) Revise the methodology to further the objectives listed in subdivision (d) of Section 65584 and adopt a final regional, or subregional, housing need allocation methodology.

(2) Adopt the regional, or subregional, housing need allocation methodology without revisions and include within its resolution of adoption findings, supported by substantial evidence, as to why the council of governments, or delegate subregion, believes that the methodology furthers the objectives listed in subdivision (d) of Section 65584 despite the findings of the department.

(j) If the department's findings are not available within the time limits set by subdivision (i), the council of governments, or delegate subregion, may act without them.

(k) Upon either action pursuant to subdivision (i), the council of governments, or delegate subregion, shall provide notice of the adoption of the methodology to the jurisdictions within the region, or delegate subregion, as applicable, and to the department, and shall publish the adopted allocation methodology, along with its resolution and any adopted written findings, on its internet website.

(l) The department may, within 90 days, review the adopted methodology and report its findings to the council of governments, or delegate subregion.

(m) (1) It is the intent of the Legislature that housing planning be coordinated and integrated with the regional transportation plan. To achieve this goal, the allocation plan shall allocate housing units within the region consistent with the development pattern included in the sustainable communities strategy.

(2) The final allocation plan shall ensure that the total regional housing need, by income category, as determined under Section 65584, is maintained, and that each jurisdiction in the region receive an allocation of units for low- and very low income households.

(3) The resolution approving the final housing need allocation plan shall demonstrate that the plan is consistent with the sustainable communities strategy in the regional transportation plan and furthers the objectives listed in subdivision (d) of Section 65584.

(Amended (as amended by Stats. 2018, Ch. 990, Sec. 3.7) by Stats. 2019, Ch. 335, Sec. 4. (AB 139) Effective January 1, 2020.)

65584.05.

(a) At least one and one-half years before the scheduled revision required by Section 65588, each council of governments and delegate subregion, as applicable, shall distribute a draft allocation of regional housing needs to each local government in the region or subregion, where applicable, and the department, based on the methodology adopted pursuant to Section 65584.04 and shall publish the draft allocation on its internet website. The draft allocation shall include the underlying data and methodology on which the allocation is based, and a statement as to how it furthers the objectives listed in subdivision (d) of Section 65584. It is the intent of the Legislature that the draft allocation should be distributed before the completion of the update of the applicable regional transportation plan. The draft allocation shall distribute to localities and subregions, if any, within the region the entire regional housing need determined pursuant to Section 65584.01 or within subregions, as applicable, the subregion's entire share of the regional housing need determined pursuant to Section 65584.03.

(b) Within 45 days following receipt of the draft allocation, a local government within the region or the delegate subregion, as applicable, or the department may appeal to the council of governments or the delegate subregion for a revision of the share of the regional housing need proposed to be allocated to

one or more local governments. Appeals shall be based upon comparable data available for all affected jurisdictions and accepted planning methodology, and supported by adequate documentation, and shall include a statement as to why the revision is necessary to further the intent of the objectives listed in subdivision (d) of Section 65584. An appeal pursuant to this subdivision shall be consistent with, and not to the detriment of, the development pattern in an applicable sustainable communities strategy developed pursuant to paragraph (2) of subdivision (b) of Section 65080. Appeals shall be limited to any of the following circumstances:

(1) The council of governments or delegate subregion, as applicable, failed to adequately consider the information submitted pursuant to subdivision (b) of Section 65584.04.

(2) The council of governments or delegate subregion, as applicable, failed to determine the share of the regional housing need in accordance with the information described in, and the methodology established pursuant to, Section 65584.04, and in a manner that furthers, and does not undermine, the intent of the objectives listed in subdivision (d) of Section 65584.

(3) A significant and unforeseen change in circumstances has occurred in the local jurisdiction or jurisdictions that merits a revision of the information submitted pursuant to subdivision (b) of Section 65584.04. Appeals on this basis shall only be made by the jurisdiction or jurisdictions where the change in circumstances has occurred.

(c) At the close of the period for filing appeals pursuant to subdivision (b), the council of governments or delegate subregion, as applicable, shall notify all other local governments within the region or delegate subregion and the department of all appeals and shall make all materials submitted in support of each appeal available on a publicly available internet website. Local governments and the department may, within 45 days, comment on one or more appeals. If no appeals are filed, the draft allocation shall be issued as the proposed final allocation plan pursuant to paragraph (2) of subdivision (e).

(d) No later than 30 days after the close of the comment period, and after providing all local governments within the region or delegate subregion, as applicable, at least 21 days prior notice, the council of governments or delegate subregion shall conduct one public hearing to consider all appeals filed pursuant to subdivision (b) and all comments received pursuant to subdivision (c).

(e) No later than 45 days after the public hearing pursuant to subdivision (d), the council of governments or delegate subregion, as applicable, shall do both of the following:

(1) Make a final determination that either accepts, rejects, or modifies each appeal for a revised share filed pursuant to subdivision (b). Final determinations shall be based upon the information and methodology described in Section 65584.04 and whether the revision is necessary to further the objectives listed in subdivision (d) of Section 65584. The final determination shall be in writing and shall include written findings as to how the determination is consistent with this article. The final determination on an appeal may require the council of governments or delegate subregion, as applicable, to adjust the share of the regional housing need allocated to one or more local governments that are not the subject of an appeal.

(2) Issue a proposed final allocation plan.

(f) In the proposed final allocation plan, the council of governments or delegate subregion, as applicable, shall adjust allocations to local governments based upon the results of the appeals process. If the adjustments total 7 percent or less of the regional housing need determined pursuant to Section 65584.01, or, as applicable, total 7 percent or less of the subregion's share of the regional housing need as determined pursuant to Section 65584.03, then the council of governments or delegate subregion, as applicable, shall distribute the adjustments proportionally to all local governments. If the adjustments total more than 7 percent of the regional housing need, then the council of governments or delegate subregion, as applicable, shall develop a methodology to distribute the amount greater than the 7 percent to local governments. The total distribution of housing need shall not equal less than the regional housing need, as determined pursuant to Section 65584.01, nor shall the subregional

distribution of housing need equal less than its share of the regional housing need as determined pursuant to Section 65584.03.

(g) Within 45 days after the issuance of the proposed final allocation plan by the council of governments and each delegate subregion, as applicable, the council of governments shall hold a public hearing to adopt a final allocation plan. To the extent that the final allocation plan fully allocates the regional share of statewide housing need, as determined pursuant to Section 65584.01 and has taken into account all appeals, the council of governments shall have final authority to determine the distribution of the region's existing and projected housing need as determined pursuant to Section 65584.01. The council of governments shall submit its final allocation plan to the department within three days of adoption. Within 30 days after the department's receipt of the final allocation plan adopted by the council of governments, the department shall determine if the final allocation plan is consistent with the existing and projected housing need for the region, as determined pursuant to Section 65584.01. The department may revise the determination of the council of governments if necessary to obtain this consistency.

(h) Any authority of the council of governments to review and revise the share of a city or county of the regional housing need under this section shall not constitute authority to revise, approve, or disapprove the manner in which the share of the city or county of the regional housing need is implemented through its housing program.

(i) Any time period in subdivision (d) or (e) may be extended by a council of governments or delegate subregion, as applicable, for up to 30 days.

(j) The San Diego Association of Governments may follow the process in this section for the draft and final allocation plan for the sixth revision of the housing element notwithstanding such actions being carried out before the adoption of an updated regional transportation plan and sustainable communities strategy.

(Amended by Stats. 2019, Ch. 634, Sec. 4. (AB 1730) Effective January 1, 2020.)

APPENDIX 2

Comparable Regions Analysis

MEMORANDUM

DATE November 29, 2021

TO Tyrone Buckley, California Department of Housing and Community Development (HCD)

CC Tom Brinkhuis, Tawny Macedo, Annelise Osterberg, and Kevin Rolfness; HCD
Kristine Cai and Meg Prince, Fresno Council of Governments

FROM David Early, Andrea Howard, and Asher Kaplan; PlaceWorks

SUBJECT Fresno COG 6th Cycle RHNA Determination, Comparable Regions Analysis – Revised November 29, 2021

Dear Mr. Buckley:

On behalf of the Fresno Council of Governments (Fresno COG), I am pleased to submit the following comparable regions analysis (CRA) as a substitute measure for calculating the overcrowding adjustment for the Fresno COG’s 6th cycle Regional Housing Needs Determination. State law allows the use of the CRA as a substitute benchmark in place of national averages, recognizing comparisons against national averages may be less appropriate than comparisons against comparable regions with healthy housing markets. The outcomes of Fresno COG’s CRA are summarized in **Table 1**.

Table 1. Comparable Regions Average + National Average Summary

Geography	Overcrowding Rate	Lower Income Household Cost Burden Rate	Higher Income Household Cost Burden Rate
Fresno County, CA	9.37%	70.64%	13.42%
USA	3.35%	60.25%	9.89%
Comparable Regions Average	4.37%	60.77%	9.45%

Introduction

After a review of other region’s CRAs and consultation with HCD staff, Fresno COG developed the following process to measure comparability:

1. Determine the appropriate geography
2. Identify an initial longlist of counties with populations 66%-130% the size of Fresno County’s.
3. Collect data, including the following set of indicators, from the 2019 ACS 5-year estimate for US counties.

4. Score each county in comparison to Fresno County for each indicator, then aggregate these scores to determine a “composite comparability score” for each county to identify counties closest in composite comparability score and population size.
5. Remove counties determined to have unhealthy housing markets.
6. Calculate an average of the overcrowding and cost burden rates for the resulting group of comparable counties.

HCD advised that the process should result in a list of between five and seven comparable counties with healthy housing markets. The process initially identified a list of seven counties, which included one county identified as having markers of an unhealthy housing market. This county was eliminated, resulting in a final list of six comparable counties.

Methodology

1. Determine the appropriate geography

The area covered by Fresno COG is both a county and a metropolitan statistical area, which have coextensive boundaries. Thus, we had to first determine whether to consider counties or MSAs for the CRA. Fresno COG consulted on this question with HCD staff, who suggested that counties are more contained than MSAs and that Fresno County’s dynamics were likely to be more similar to those of other counties than other MSAs. Fresno COG therefore determined that the analysis should use counties as the comparable geographic unit.

2. Identify an initial longlist of counties with populations 70%-130% of Fresno County’s

The 2019 ACS 5-year estimate reports Fresno County’s population as 984,521. Our initial longlist numbers 70 counties with populations between 66%-133% of Fresno County’s. The full initial longlist can be found in **Appendix A, Table A-1**.

Fresno County has a relatively large population size among US counties, so comparable counties were generally smaller. Of 70 counties longlisted for population size, only 16 counties had populations larger than Fresno County’s, and none of these 16 counties scored highly enough in the composite score comparison (described below) to appear in the final list of counties. The seven counties found to be most comparable to Fresno County through the composite score comparison ranged between 69% and 104% of Fresno County’s population size.

3. Collect indicators from 2019 ACS 5-year estimate

Nine comparability indicators were chosen based on precedent Comparable Region Analyses shared by HCD, as well as Fresno COG’s knowledge of factors that characterize Fresno County.

- Common CRA Factors (with ACS 2019 5-year estimate Table IDs)
 - Median Household Income (B19013)
 - GINI Index (B19083)
 - Share of population living in poverty (B17020)
 - Share of population with bachelor’s degree or higher (B15003)
 - Share of households that moved in 2017 or later (B25038)
 - Median age of workers (B23013)
 - Total workers (16 and over) (B08603)
 - % of population 17 and under or 64 and over (B01001)

- Factors Unique to Fresno County’s CRA
 - Share of population working in agriculture, forestry, fishing, hunting, and mining. (C24050)

Although this indicator was not used in CRAs completed in other parts of the state, similar indicators have been used. Fresno County is one of the country’s largest agricultural production centers, which makes agricultural workers and their housing needs important considerations. This indicator is included in a similar way to the inclusion of Public Administration Jobs as a comparability indicator in the Sacramento Area Council of Government (SACOG) CRA, in that it helps identify counties that share some degree of comparability with Fresno County in terms of workforce composition.

4. Score each county in comparison with Fresno County. Aggregate these scores to determine a “composite comparability score.”

This section describes the scoring and normalization process. Because indicator values vary in scale and format, normalization was necessary for a comparison among them.

1. Initial scoring

Counties were assigned **initial scores** for each indicator. An **initial score** is the percentage difference between a comparable county’s value and Fresno County’s value for a specific indicator (as an absolute value.)

$$\text{Initial score} = |(y - x)/y|$$

x = comparable county value

y = Fresno County value

2. *Calculating normalization factors for each indicator*

Normalization factors are unique to each indicator. The **normalization factor** for each indicator was calculated by dividing 1 by the **average initial score (z)** across all US counties for that indicator (the sum of all US county initial scores for that indicator divided by the total number of counties).

$$\text{Average initial score} = \text{sum}(\text{all US County initial scores}) / \# \text{ of US Counties}$$

$$\text{Average initial score} = z$$

$$\text{Normalization factor} = 1/z$$

3. *Normalizing scores*

Multiplying all **initial scores** for a given indicator by that indicator's **normalization factor** proportionally rescaled scores and caused the average score for that indicator to become 1, which we refer to as the **normalized average score**. This was repeated for each indicator using each indicator's unique **normalization factor**. This process gives us **normalized scores**, with each indicator now sharing the same **normalized average score (1)**.

$$\text{Initial score} = |(y - x)/y|$$

$$\text{Normalization factor} = 1/z$$

$$\text{Normalized Score} = |(y - x)/y| * (1/z)$$

x = comparison county value

y = Fresno County value

z = average initial score = sum(all US County initial scores) / # of US Counties

For example, when scoring median household income comparability for Polk County, Florida, we found the following:

- The **initial score is 0.0627**, which is the percentage difference in median income between Fresno and Polk Counties. $|(\$53,969 - \$50,584) / \$53,969| = 0.0627$.
- The **average initial score is 0.204** for household median income. This is the percentage difference between Fresno County and the average US county, or the sum of all US county scores divided by the total number of counties.
- The **normalization factor is 4.90**, which is calculated by dividing 1 by the **average initial score (0.204)**.
- The **normalized score for Polk County is 0.307**, which is calculated by multiplying the initial score (0.0627) by the normalization factor (4.90).
-

Once the normalized scores are calculated for each indicator, we sum these scores to create a "composite score." The counties with the lowest composite scores are the ones that are most comparable to Fresno County. Higher scores indicate greater difference from Fresno County.

Tables 2 and 3 show the raw scores, the normalized comparability indicator scores, and the composite scores for the seven counties found to be most comparable to Fresno County.

Table 2. Comparability Indicator Values

Source: ACS 2019 5-year estimates

County	Median Household Income	GINI Index	% Population Living in Poverty	% Population 25 Years and Over: Bachelor's Degree or Better	% Occupied Housing Units: Moved in 2017 or Later	Median Worker Age	Total Workers (16 and over)	% Population under 17 or over 64	% Employed Civilian Population 16 Years and Over: Agriculture, Forestry, Fishing and Hunting, and Mining
Fresno County, CA	\$53,969	0.4746	22.55%	21.17%	10.64%	37.9	395,689	40.49%	9.69%
Kern County, CA	\$53,350	0.4668	21.00%	16.38%	10.52%	37.6	337,438	39.75%	15.83%
El Paso County, TX	\$46,871	0.4613	10.08%	23.31%	11.94%	37.6	361,986	39.35%	1.07%
Pima County, AZ	\$53,379	0.4694	16.81%	32.38%	13.16%	38.1	442,389	40.35%	1.10%
San Joaquin County, CA	\$64,432	0.4529	14.51%	18.76%	9.06%	39.4	303,147	39.84%	4.52%
Polk County, FL	\$50,584	0.4452	15.83%	20.17%	11.64%	40.2	281,139	42.44%	1.62%
Oklahoma County, OK	\$54,520	0.4911	15.96%	31.99%	13.50%	37.6	373,566	38.94%	3.37%
Bernalillo County, NM	\$53,329	0.4770	16.69%	34.41%	11.01%	38.6	317,562	37.85%	1.04%

Table 3. Normalized Comparability Indicator Scores and Composite Scores

Source: ACS 2019 5-year estimates

County	Median Household Income (In 2019 Inflation Adjusted Dollars)	GINI Index	% Pop. Living in Poverty	% Pop. 25 Years and Over: Bachelor's Degree or Better	% Occupied Housing Units: Moved in 2017 or Later	Median Worker Age	Total Workers (16 and over)	% Population under 17 or over 64	% Employed Civilian Population 16 Years and Over: Agriculture, Forestry, Fishing and Hunting, and Mining	Composite Score
Fresno County, CA	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Kern County, CA	0.06	0.20	0.17	0.69	0.04	0.08	0.16	0.25	0.92	2.57
El Paso County, TX	0.64	0.34	0.26	0.31	0.45	0.08	0.09	0.39	1.30	3.87
Pima County, AZ	0.05	0.13	0.64	1.61	0.87	0.05	0.13	0.05	1.29	4.82
San Joaquin County, CA	0.95	0.56	0.89	0.35	0.54	0.40	0.25	0.22	0.78	4.95
Polk County, FL	0.31	0.76	0.75	0.14	0.34	0.62	0.31	0.67	1.21	5.12
Oklahoma County, OK	0.05	0.43	0.73	1.55	0.99	0.08	0.06	0.53	0.95	5.37
Bernalillo County, NM	0.06	0.06	0.65	1.90	0.13	0.19	0.21	0.91	1.30	5.41

5. Exclude counties determined to have unhealthy housing markets.

HCD advised that comparable regions should have healthy housing markets. With that in mind, Fresno COG developed a methodology to identify any potentially unhealthy housing markets among the seven counties found most comparable to Fresno County.

Fresno COG used cost burden rates as an indicator for identifying and eliminating unhealthy housing markets. Counties with a cost burden average exceeding the national average both by 10% or more for lower income and 5% or more for higher income cost burden averages were to be eliminated.

Table 4 contains a breakdown of these indicators by income group for the seven most comparable counties. Based on these criteria, San Joaquin County was determined to have an unhealthy housing market. As is reflected in **Table 4**, this county has the highest rate of cost burden among comparable counties across both income groups by a substantial margin.

Table 4. Comparable Counties Housing Market Conditions*

Source: 2019 ACS, 2018 CHAS - Income by Cost Burden (Owners and Renters)

Counties	Lower Income Cost Burden	Higher Income Cost Burden
USA Average	60.25%	9.89%
Fresno County, CA	70.64%	13.42%
Kern County, CA	67.41%	13.02%
El Paso County, TX	56.20%	8.46%
Pima County, AZ	63.10%	9.59%
San Joaquin County, CA	72.02%	16.89%
Polk County, FL	59.83%	10.57%
Oklahoma County, OK	54.00%	5.95%
Bernalillo County, NM	64.58%	9.23%

***Bolded** values indicate values outside the specified range set as markers of housing market health.*

6. Calculate the average of the overcrowding and cost burden rates for the resulting group of comparable counties.

Table 5 compares overcrowding and cost burden data for Fresno County with the averages for the final six comparable counties and the United States. The comparable regions averages for overcrowding and cost burden were calculated using the original ACS data on overcrowding and cost burden from each jurisdiction and are the result of dividing the total number of overcrowded or cost burden households in all five comparable regions by the total number of households in all five jurisdictions overall. Detailed tables showing cost burden and overcrowding data and averages for comparable regions can be found in **Appendix A, Tables A-2, A-3, and A-4.**

Table 5. Comparable Region Analysis Summary

Source: ACS 2019 5-year estimates, CHAS 2018

County	Overcrowding Rate	Lower Income Household Cost Burden Rate	Higher Income Household Cost Burden Rate
Fresno County, CA	9.37%	70.64%	13.42%
USA Average	3.35%	60.25%	9.89%
Comparable Regions Average	4.37%	60.77%	9.45%
Kern County, CA	9.21%	67.41%	13.02%
El Paso County, TX	5.09%	56.20%	8.46%
Pima County, AZ	3.62%	63.10%	9.59%
Polk County, FL	3.36%	59.83%	10.57%
Oklahoma County, OK	2.71%	54.00%	5.95%
Bernalillo County, NM	2.66%	64.58%	9.23%

Conclusion and Request

After completing steps 1-6, described above, the analysis resulted in a list of six top-scoring comparable counties, shown in **Table 6**.

Table 6. Composite Scores and Comparability Ranking

Source: ACS 2019 5-year estimates, CHAS 2018

County	Population	Composite Score*	Comparability Ranking**
Fresno County, CA	984,521	0.00	0
Kern County, CA	887,641	2.57	1
El Paso County, TX	836,062	3.87	2
Pima County, AZ	1,027,207	4.82	3
Polk County, FL	686,218	5.12	5
Oklahoma County, OK	787,216	5.37	6
Bernalillo County, NM	677,858	5.41	7

*Smaller numbers indicate closer comparability.

** Note that the county ranked #4 was eliminated due to excessive cost burden, the specified marker of an unhealthy housing market.

As is shown in **Table 7**, the six final comparable regions have an average overcrowding rate of 4.37%, 1.02% higher than the national average. Comparable region cost burden rates are 60.77% and 9.05% each for lower and higher income groups, 0.52% above and 0.44% below their respective national averages.

Table 7. Comparable Regions Average + Requested Adjustment

Source: ACS 2019 5-year estimates, CHAS 2018

Geography	Overcrowding Rate	Lower Income Household Cost Burden Rate	Higher Income Household Cost Burden Rate
Fresno County, CA	9.37%	70.64%	13.42%
USA	3.35%	60.25%	9.89%
Comparable Regions Average	4.37%	60.77%	9.45%
Comparable Regions Impact	+1.02%	+0.52%	-0.44%

Fresno COG asks that HCD utilize the Comparable Regions Averages for Overcrowding and Cost Burden, shown in **Table 7**, to determine the Fresno COG region's Final 6th Cycle RHNA Determination.

APPENDIX A

Table A-1: 66%-133% Population Longlist in Descending Order by Composite Score

Source: ACS 2019 5-year estimates

County	Total Population	As a % of Fresno	Composite Score
Fresno County, California	984,521	100%	0.00
Kern County, California	887,641	90%	2.57
El Paso County, Texas	836,062	85%	3.87
Pima County, Arizona	1,027,207	104%	4.82
San Joaquin County, California	742,603	75%	4.95
Polk County, Florida	686,218	70%	5.12
Oklahoma County, Oklahoma	787,216	80%	5.37
Bernalillo County, New Mexico	677,858	69%	5.41
Jackson County, Missouri	696,216	71%	5.62
Milwaukee County, Wisconsin	951,226	97%	5.67
Jefferson County, Alabama	659,680	67%	5.80
Jefferson County, Kentucky	767,419	78%	5.85
Hidalgo County, Texas	855,176	87%	5.89
Shelby County, Tennessee	936,374	95%	5.92
Pinellas County, Florida	964,666	98%	6.20
Marion County, Indiana	951,869	97%	6.66
Hamilton County, Ohio	813,589	83%	6.72
Cuyahoga County, Ohio	1,247,451	127%	6.75
Erie County, New York	919,355	93%	6.84
Duval County, Florida	936,186	95%	6.97
Lee County, Florida	737,468	75%	7.07
Monroe County, New York	743,341	76%	7.34
Macomb County, Michigan	870,325	88%	7.78
New Haven County, Connecticut	857,513	87%	8.56
Pierce County, Washington	877,013	89%	8.60
Allegheny County, Pennsylvania	1,221,744	124%	8.81
DeKalb County, Georgia	749,323	76%	9.17
St. Louis County, Missouri	996,919	101%	9.34
Essex County, New Jersey	795,404	81%	9.68
Hartford County, Connecticut	893,561	91%	9.70
Franklin County, Ohio	1,290,360	131%	9.76
Salt Lake County, Utah	1,133,646	115%	10.05
Gwinnett County, Georgia	915,046	93%	10.13
Honolulu County, Hawaii	984,821	100%	10.18
Ventura County, California	847,263	86%	10.19
Baltimore County, Maryland	828,018	84%	10.37

County	Total Population	As a % of Fresno	Composite Score
Worcester County, Massachusetts	824,772	84%	10.46
El Paso County, Colorado	698,974	71%	10.48
Essex County, Massachusetts	783,676	80%	10.60
Davidson County, Tennessee	687,488	70%	10.68
Hudson County, New Jersey	670,046	68%	11.12
Multnomah County, Oregon	804,606	82%	11.32
Mecklenburg County, North Carolina	1,074,475	109%	11.36
Snohomish County, Washington	798,808	81%	11.96
Hennepin County, Minnesota	1,245,837	127%	12.11
Oakland County, Michigan	1,253,185	127%	12.23
Cobb County, Georgia	751,218	76%	12.35
Prince George's County, Maryland	908,670	92%	12.40
Lake County, Illinois	701,473	71%	12.64
Will County, Illinois	689,315	70%	12.73
Fort Bend County, Texas	765,394	78%	12.92
Contra Costa County, California	1,142,251	116%	13.20
Montgomery County, Pennsylvania	823,823	84%	13.44
Denver County, Colorado	705,576	72%	13.69
Fulton County, Georgia	1,036,200	105%	13.73
Middlesex County, New Jersey	825,920	84%	13.76
DuPage County, Illinois	929,060	94%	13.97
Denton County, Texas	833,822	85%	14.16
Wake County, North Carolina	1,069,079	109%	14.28
Suffolk County, Massachusetts	796,605	81%	14.63
Travis County, Texas	1,226,805	125%	14.72
Bergen County, New Jersey	930,390	95%	15.05
Norfolk County, Massachusetts	700,437	71%	15.12
Fairfield County, Connecticut	943,926	96%	15.19
Westchester County, New York	968,890	98%	15.76
Montgomery County, Maryland	1,043,530	106%	16.17
San Mateo County, California	767,423	78%	16.50
Collin County, Texas	973,977	99%	16.56
District of Columbia, District of Columbia	692,683	70%	17.29
San Francisco County, California	874,961	89%	18.95
Fairfax County, Virginia	1,145,862	116%	19.69

TABLE A-2: Comparable Regions Cost Burden Summary:
Average Households by Income Group and Average Rates of Cost Burden

Source: CHAS 2018

Detailed Income Group	Average Households Across Comparable Regions by Detailed Income Groups		Simplified Income Group	Average Households Across Comparable Regions by Simplified Income Groups		Average Cost Burden Rates by Simplified Income Group
	Average Cost Burdened Households (>30%)	Average Total Households		Average Cost Burdened Households (>30%)	Average Total Households	
<= 30% HAMFI*	26,723	36,276	Lower Income Households	73,000	120,128	<u>60.77%</u>
>30% to <=50% HAMFI*	24,608	34,929				
>50% to <=80% HAMFI*	21,669	48,923				
>80% to <=100% HAMFI*	6,824	28,456	Higher Income Households	15,689	165,973	<u>9.45%</u>
>100% HAMFI*	8,865	137,518				
TOTAL	88,689	286,103	TOTAL	88,689	286,103	

*"HAMFI" refers to the U.S. Department of Housing and Urban Development (HUD) Area Median Family Income

TABLE A-3: Comparable Regions Cost Burden Calculation Detail

Source: CHAS 2018

		Kern County, CA		El Paso County, TX		Pima County, AZ		Polk County, FL		Oklahoma County, OK		Bernalillo County, NM	
Simple Income Group	Detailed Income Group	Cost Burden (>30%)	Total House-holds	Cost Burden (>30%)	Total House-holds	Cost Burden (>30%)	Total House-holds						
Lower Income House-holds	<= 30% HAMFI*	26,520	34,295	24,375	36,355	38,090	50,545	15,230	21,745	30,315	40,675	25,810	34,040
	>30% to <=50% HAMFI*	24,455	32,065	22,290	35,395	34,680	47,220	16,700	23,835	25,090	38,280	24,430	32,780
	>50% to <=80% HAMFI*	24,290	45,290	20,350	47,490	30,480	65,870	18,610	38,890	17,135	55,375	19,150	40,625
Higher Income House-holds	>80% to <=100% HAMFI*	7,605	24,880	5,860	26,185	10,105	40,905	6,665	23,580	4,410	30,490	6,300	24,695
	>100% HAMFI*	12,735	131,385	6,320	117,770	12,415	193,995	8,360	118,555	5,250	131,995	8,110	131,405
	TOTAL	95,605	267,915	79,195	263,200	125,770	398,530	65,565	226,605	82,200	296,820	83,800	263,550

*"HAMFI" refers to the U.S. Department of Housing and Urban Development (HUD) Area Median Family Income

Table A-4: Overcrowding Calculation Detail

Source: ACS 2019 5-year estimates

Simple Overcrowding Category	Not Overcrowded		Overcrowded			
Detailed Overcrowding Category	Occupied Housing Units: 0.50 or Less Occupants Per Room	Occupied Housing Units: 0.51 to 1.00 Occupants Per Room	Occupied Housing Units: 1.01 to 1.50 Occupants Per Room	Occupied Housing Units: 1.51 to 2.00 Occupants Per Room	Occupied Housing Units: 2.01 or More Occupants Per Room	Total Occupied Housing Units
Kern County, CA	144,473	100,906	17,587	5,298	2,018	270,282
El Paso County, TX	158,609	96,041	8,949	3,021	1,690	268,310
Pima County, AZ	283,488	106,590	10,085	3,472	1,104	404,739
Polk County, FL	166,490	60,881	4,735	1,889	1,288	235,283
Oklahoma County, OK	213,755	79,632	6,065	1,684	434	301,570
Bernalillo County, NM	196,626	63,963	4,577	2,102	431	267,699
Average Housing Units by Detailed Category	193,907	84,669	8,666	2,911	1,161	291,314
Average Housing Units by Simple Category	278,576		12,738			291,314
Average Overcrowding Rate by Simple Category	95.6%		<u>4.37%</u>			

APPENDIX 3

Final Regional Housing Need Determination

**DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
DIVISION OF HOUSING POLICY DEVELOPMENT**

2020 W. El Camino Avenue, Suite 500
Sacramento, CA 95833
(916) 263-2911 / FAX (916) 263-7453
www.hcd.ca.gov



December 17, 2021

Tony Boren, Executive Director
Fresno Council of Governments
2035 Tulare Street, Suite 201
Fresno, CA 93721

Dear Executive Director Tony Boren:

RE: Final Regional Housing Need Determination

This letter provides the Fresno Council of Governments (Fresno COG) with its Final Regional Housing Need Determination. Pursuant to state housing element law (Government Code section 65584, et seq.), the Department of Housing and Community Development (HCD) is required to provide the determination of Fresno COG's existing and projected housing need. In assessing Fresno COG's regional housing need, HCD and Fresno COG staff completed a consultation process from November 2020 through December 2021 that included the methodology, data sources, and timeline for HCD's determination of the Regional Housing Need. To inform this process, HCD also consulted with Walter Schwarm and Doug Kuczynski of the California Department of Finance (DOF) Demographic Research Unit.

Attachment 1 displays the minimum regional housing need determination of **58,298** total units across four income categories. Fresno COG is to distribute the units amongst the region's local governments. Attachment 2 explains the methodology applied pursuant to Government Code section 65584.01. In determining Fresno COG's housing need, HCD considered all the information specified in state housing law (Government Code section 65584.01(c)).

Fresno COG is responsible for adopting a methodology for RHNA and RHNA Plan for the projection period beginning June 30, 2023 and ending December 31, 2031. Pursuant to Government Code section 65584(d), the methodology to prepare Fresno COG's RHNA plan must further the following objectives:

- (1) Increasing the housing supply and mix of housing types, tenure, and affordability.
- (2) Promoting infill development and socioeconomic equity, protecting environmental and agricultural resources, and encouraging efficient development patterns
- (3) Promoting an improved intraregional relationship between jobs and housing
- (4) Balancing disproportionate household income distributions

(5) Affirmatively furthering fair housing

Pursuant to Government Code section 65584.04(d), to the extent data is available, Fresno COG shall include the factors listed in Government Code section 65584.04(d)(1-13) to develop its RHNA plan. Also, pursuant to Government Code section 65584.04(f), Fresno COG must explain in writing how each of these factors was incorporated into the RHNA plan methodology and how the methodology furthers the statutory objectives described above.

HCD encourages all Fresno COG's local governments to consider the many affordable housing and community development resources available to local governments. HCD's programs can be found at <https://www.hcd.ca.gov/grants-funding/nofas.shtml>.

HCD commends Fresno COG's leadership in fulfilling their important role in advancing the state's housing, transportation, and environmental goals. HCD looks forward to continued partnership with Fresno COG and member jurisdictions and assisting Fresno COG in planning efforts to accommodate the region's share of housing need.

If HCD can provide any additional assistance, or if you, or your staff, have any questions, please contact Tom Brinkhuis, Senior Housing Policy Specialist at (916) 776-7707 or tom.brinkhuis@hcd.ca.gov.

Sincerely,



Tyrone Buckley
Assistant Deputy Director of Fair Housing

Enclosures

ATTACHMENT 1

HCD REGIONAL HOUSING NEED DETERMINATION Fresno COG: June 30, 2023 through December 31, 2031

<u>Income Category</u>	<u>Percent</u>	<u>Housing Unit Need</u>
Very-Low*	26.7%	15,592
Low	15.7%	9,143
Moderate	15.5%	9,047
Above-Moderate	42.1%	24,516
Total	100.0%	58,298
* Extremely-Low	14.0%	Included in Very-Low Category

Income Distribution:

Income categories are prescribed by California Health and Safety Code (Section 50093, et. seq.). Percents are derived based on Census/ACS reported household income brackets and county median income.

ATTACHMENT 2

HCD REGIONAL HOUSING NEED DETERMINATION: June 30, 2023 through December 31, 2031

Methodology

Fresno COG: PROJECTION PERIOD (8.5 years) HCD Determined Population, Households, & Housing Unit Need		
Reference No.	Step Taken to Calculate Regional Housing Need	Amount
1.	Population: December 31 (Fresno COG April 1, 2031 projection adjusted + 9 months to December 31, 2031)	1,125,646
2.	<i>- Group Quarters Population: December 31 (Fresno COG April 1, 2031 projection adjusted + 9 months to December 31, 2031)</i>	19,859
3.	Household (HH) Population	1,105,787
4.	Projected Households	341,336
5.	+ Vacancy Adjustment (2.72%)	+9,277
6.	+ Overcrowding Adjustment (5.00%)	+17,069
7.	+ Replacement Adjustment (.5%)	+1,707
8.	<i>- Occupied Units (HHs) estimated June 30, 2023</i>	-314,596
9.	+ Cost Burden Adjustment	+3,505
Total	6th Cycle Regional Housing Need Assessment (RHNA)	58,298

Detailed background data for this chart available upon request.

Explanation and Data Sources

- 1-4. Population, Group Quarters, Household Population, & Projected Households: Pursuant to Gov. Code Section 65584.01, projections were extrapolated from Fresno COG and DOF projections. Population reflects total persons. Group Quarter Population reflects persons in a dormitory, group home, institute, military, etc. that do not require residential housing. Household Population reflects persons requiring residential housing. Projected Households reflect the propensity of persons within the Household Population to form households at different rates based on American Community Survey (ACS) trends.
5. Vacancy Adjustment: HCD applies a vacancy adjustment based on the difference between a standard 5% vacancy rate and region's current "for rent and sale" vacancy percentage to determine healthy market vacancies to facilitate housing availability and resident mobility. The adjustment is the difference between standard 5% vacancy rate and region's current vacancy rate (**2.28%**) is based on the 2015-2019 ACS data. For Fresno COG, that difference is **2.72%**.
6. Overcrowding Adjustment: In regions where the overcrowding rate is greater than the average of comparable regions' overcrowding rate, HCD applies an adjustment based on the amount the region's overcrowding rate exceeds the comparable regions' average overcrowding rate. For Fresno COG, the region's overcrowding rate (**9.37%**) is higher than the average for comparable regions (4.37%), resulting in a **5.00%** adjustment.
7. Replacement Adjustment: HCD applies a replacement adjustment from between .5% and 5% to the total housing stock based on the current 10-year average of demolitions in the region's local government annual reports to Department of Finance

(DOF). For Fresno COG, the 10-year average is **.44%**, therefore a **.5%** adjustment was applied.

8. Occupied Units: This figure reflects DOF's estimate of occupied units at the start of the projection period (June 30, 2023).
9. Cost Burden Adjustment: HCD applies an adjustment to the projected need by comparing the difference in cost burden by income group for the region to the cost burden by income group for the comparable regions, as determined by Fresno COG. The very low- and low-income RHNA is increased by the percent difference ($70.64\% - 60.77\% = \mathbf{9.87\%}$) between the region and the comparable regions' cost burden rate for households earning 80% of area median income and below, then this difference is applied to very low- and low-income RHNA proportionate to the share of the population these groups currently represent. The moderate- and above moderate-income RHNA is increased by the percent difference ($13.42\% - 9.45\% = \mathbf{3.97\%}$) between the region and the comparable regions cost burden rate for households earning above 80% area median income, then this difference is applied to moderate- and above moderate-income RHNA proportionate to the share of the population these groups currently represent. Data is from 2014-2018 CHAS.

APPENDIX 4

Stakeholder Workshop Summary

Fresno COG RHNA Stakeholder Workshops 1 and 2**Summary****Date: May 19, 2021****Time: 10:00 a.m. to 11:00 a.m., and 6:00 p.m. to 7:00 p.m.****Place: Via zoom****ATTENDEES**

City of Firebaugh: Ben Gallegos

City of Fresno: Casey Lauderdale; Marisela Martinez, Shawn Monk

City of Parlier: Alma Beltran, Sonia Hall

City of Sanger: David Brletic

Fresno COG: Robert Phipps, Meg Prince, Seth Scott, Braden Duran

PlaceWorks: David Early, Andrea Howard, Allison Giffin

Office of California Assemblymember Joaquin Arambula: Chongtoua Mouavangsou

California Rural Legal Assistance: Mariah Thompson

Faith in the Valley: Janine Nkosi

Measure C Citizens Oversight Committee: Gail Miller, Jim Hunter

PRESENTATION

PlaceWorks, the consultant team supporting Fresno COG's 6th Cycle RHNA development, gave a PowerPoint presentation covering the following topics:

1. The purpose and process of RHNA
2. A review of the process for preparing the 6th Cycle RHNA
3. A review of the State-required objectives the RHNA must advance, and factors the region must consider in developing its methodology
4. An overview of data used to inform the RHNA development
5. And a review of the project work plan and schedule

The presentation concluded asking for stakeholder input on the required objectives and factors.

Slides from the presentation are attached to the end of this Workshop Summary.

DISCUSSION

Question: How is RHNA compliance enforced?

Answer: The final allocation resulting from the adopted RHNA methodology approved by HCD is incorporated into each jurisdiction's Housing Element. HCD reviews jurisdictional Housing Elements and determines whether the RHNA units by income threshold are adequately zoned for in the jurisdiction's Housing Element (including any updates to the zoning code). Jurisdictions that are found to be compliant (in that they have demonstrated 'adequate housing sites' to accommodate their allocated RHNA units), are eligible for certain types of funding. There is currently no penalty associated with jurisdictions found not to have demonstrated adequate housing sites in their Housing Elements, but they are not eligible for these funding sources.

Question: Does this make the case for a 'housing trust fund,' so cities or local jurisdictions have means to enable the private sector to build?

Answer: almost no communities in the state manage to build enough housing. A tool like a housing trust fund would be a helpful tool that is unfortunately not as common because it is difficult to find and maintain the funds. A few jurisdictions in the Fresno region are using their LEAP funds to explore the potential for a housing trust fund. There could be one for the City of Fresno and/or maybe a San Joaquin valley-wide trust fund. We cannot use the LEAP funds directly for the trust fund, but we can use the LEAP funds to research the feasibility.

Question: What data sources are used to evaluate the required factors and objectives, and in what way are factors being 'considered' in the methodology?

Answer: There is no strict methodology or requirement dictating what data sources should be used in the RHNA, or how to 'further' each objective, or how to 'consider' each factor. HCD does require that any data sources used are generally available (even if proprietary) so that the precise methodology can be duplicated. PlaceWorks' approach has been to use data sources such as the Census or American Community Survey (ACS), publicly available Geographic Information System (GIS) data, and other widely available sources. These data sources are analyzed such that scores are attributed to each jurisdiction (e.g. percent land acreage or percentage of the population). Scores on varying scales are converted into generic ranked scale that is input into an excel-based allocation tool. The allocation tool uses the chosen adjustment factors and corresponding weights as inputs to distribute RHNA units to each jurisdiction.

Comment: The most important factors for Fresno County are any factors pertaining to environmental justice, and/or Affirmatively Furthering Fair Housing (AFFH). The City of Fresno is among California's most segregated areas, and AFFH really ties together a lot of other objectives. It is important to assign more low-income units to higher-income higher-resource areas.

Comment: Regarding the factor 'lack of sewer or water capacity beyond a jurisdiction's control,' there could be resistance on the part of a jurisdiction to extend services or infrastructure, claiming that these issues are beyond their control when in fact they are within the jurisdiction's control.

Comment: There is a need for dormitory-style housing for agricultural workers. It is important to consider the housing needs of agricultural workers more generally. Homelessness is also a big factor to consider. However, making capacity, which is in the purview of RHNA, is different than actually building housing units, which is not on the purview of RHNA.

Comment: Jurisdiction staff generally believe in the mission or goal that policies are meant to achieve. Most policies that come from the State are responses to major issues (like affordable housing). As a jurisdiction, we can ‘set the stage’ (or make capacity) as best we can, but there is only so much jurisdiction staff are able to do to build more units.

Question: Is there a way to look at how COVID has impacted loss of affordable rental units?

Answer: we did look at the potential of a dataset describing movement patterns where people from the coastal areas have moved to the inland areas during COVID, but we have not found a good data source to differentiate between one jurisdiction and another. Please notify PlaceWorks if you find a dataset that does this.

Comment: There is a lot of affordable housing in Parlier, but there is a loss of moderate-income housing. Parlier gets a lot of requests to build moderate income housing, and families end up moving out of Parlier to Sanger or Selma. These families may not be able to afford Fresno or Clovis but would like larger houses. A lot of moderate-income households are moving to Sanger. However, housing is still needed at all affordability levels in Parlier. The cost of rent is currently about equal to the cost of mortgage payments.

Comment: Another important data point is the types of subsidized housing available, for example the number of units under a Low-Income Housing Tax Credit (LIHTC) or Rental Assistance Demonstration (RAD) program.

Comment: The income-shift method to allocate the total RHNA units in each jurisdiction by income level is a good approach because it furthers AFFH goals and is equitable.

Question: What is the dollar amount associated with housing that is considered ‘affordable’?

Answer: Affordability ranges (very low, low, moderate, and above-moderate) are percentages of the Area Median Income (AMI) for the region, in this case Fresno County.

Question: Is there a good data source for documenting change in tenure from 2008 to 2020?

Answer: housing tenure data associated with 2020 ACS 5-year estimates will be available in December 2021 (from data.census.gov). These can be compared to 2008 5-year estimates.

SUMMARY

The most important factors are those that further AFFH goals, which place more affordable units in high-opportunity areas. This includes any of the opportunity scores: TCAC, AARP, or Children Living Above Poverty. Housing for agricultural workers is also important to include as a factor.

NEXT STEPS

PlaceWorks will bring these results to the next RHNA Subcommittee to consider when voting on base allocations and weights to be used in the final RHNA allocation methodology.

APPENDIX 5

Fair Housing Survey Results and Full Text



Fresno Council of Governments
Regional Housing Needs Assessment
(RHNA)
Member Jurisdiction Survey Results

RHNA is governed by California Government Code, which specifies certain requirements, including the provision that each Council of Governments must survey its member jurisdictions to request information that will inform the development of the RHNA Plan, by collecting data regarding the Objectives and Factors required for consideration in RHNA Plan development, described below.

Government Code specifies five Objectives all RHNA Plans must further:

1. **Increased Supply and Affordability**—Increase housing supply and mix of housing types, tenure, and affordability in all cities and counties in an equitable manner.
2. **Environmental Justice**—Promote infill development and socioeconomic equity, protect environmental and agricultural resources, encourage efficient development patterns, and achieve GHG reduction targets.
3. **Jobs-Housing Balance**—Promote improved intraregional jobs-housing relationship, including balance between low-wage jobs and affordable housing.
4. **Affordability Balance**—Balance disproportionate household income distributions (more high-income RHNA to lower-income areas and vice-versa).
5. **Affirmatively Further Fair Housing**—promote fair housing choice and foster inclusive communities that are free from discrimination.

Additionally, Government Code identifies several Factors to be considered when developing the RHNA methodology:

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 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. And The region's GHG targets.

The Survey questions, which are each related to one of the above listed Factors or Objectives, were intended to gather information that will inform the RHNA Plan, pursuant to the law. If a jurisdiction provided information, the survey asked that it be provided in a format that is comparable across all jurisdictions.

Results Summary

Sixteen respondents representing the following fifteen jurisdictions took the survey:

- Clovis
- Coalinga
- Firebaugh
- Fowler
- City of Fresno
- County of Fresno
- Kerman
- Kingsburg
- Mendota
- Orange Cove
- Parlier
- Reedley
- San Joaquin
- Sanger
- Selma (2 respondents).

Themes and Key Findings

Farmworker housing was identified as a need by roughly half of respondents (7).

One jurisdiction indicated additional data points to consider: Migration trends from coastal areas into the central valley during COVID.

Other findings from the Survey results are summarized below, with the number of respondents supporting the specified information shown in parenthesis:

- *Common Opportunities for Housing Production:*
 - Drinking Water availability (7 opportunity, 5 constraint)
 - Sewer Capacity (7 opportunity, 6 constraint)
 - Availability of Developable Land (7 opportunity, 6 constraint)
- *Common Constraints in the way of Housing Production:*
 - State VMT requirements (10 constraint, 2 opportunity)
 - Financing/funding for affordable housing (10 constraint, 5 opportunity)
 - Construction costs (7 constraint, 2 opportunity)
 - Availability of construction workforce (7 const, 2 opportunity)
 - Availability of surplus public land (7 constraint, 0 opportunity)
 - Availability of Parks (7 constraint, 3 opportunity)
- *Barriers to meeting RHNA at very low- and Low-income levels:*
 - Availability of gap financing (10)
 - Local affordable housing development capacity (7)
 - Community opposition (6)
- *Most widely cited barriers to fair housing:*
 - Range of job opportunities available (8)
 - Deteriorated or abandoned properties (8)
 - Lack of private investments in low-income communities (8)
 - Community opposition to developments (7)

Survey Content

The complete Survey distributed to Fresno COG member jurisdictions is available on the project webpage at <https://www.fresnocog.org/project/fresno-county-regional-housing-needs-allocation-plan/>.

Table 1, included in the survey, lists the datasets collected at the time the Survey was issued and how they correspond to the Objectives and Factors required in the 6th Cycle RHNA methodology. Datasets collected are listed as column headings and corresponding Objectives/Factors are listed as row headings. Cells under each column are marked with an “X” where they correspond with Objectives and/or Factors in each row. Table 1 was specifically referenced in survey question 11, asking respondents for additional data points that are important to consider in developing the Fresno COG RHNA methodology.

Table 1: Data Pertaining to Objectives and Factors

Data	Household Growth Projections	Housing Tenure	Existing Housing Unit Types	Housing Cost Burden	Agricultural Lands	Natural Hazards	Environmental Lands	Existing and Future Jobs	Jobs-Housing Balance	Affordable Housing Stock	Local Development Capacity	Homelessness	Childhood Poverty Status	Jobs-Housing Fit	Existing and Projected Sewer and Water Capacity	Overcrowding	Racial Distribution	Housing-Related VMT	Approved Residential Development	Farmworker Employment and Housing Needs	Infill Development Potential
Existing and projected jobs/housing relationship, particularly low-wage jobs and affordable housing	X	X	X	X				X	X					X		X	X		X		
Lack of capacity for sewer or water service due to decisions outside jurisdiction’s control															X						
Availability of land suitable for urban development					X	X	X				X										X
Lands protected from urban development under existing federal or State programs					X		X														
County policies to preserve prime agricultural land					X																
Distribution of household growth in RTP and opps. to maximize use of transit & existing transportation infrastructure	X							X	X	X	X			X				X			X
Agreements to direct growth toward incorporated areas					X		X														
Loss of deed-restricted affordable units			X																		
Households paying more than 30 percent and more than 50 percent of their income in rent				X																	
The rate of overcrowding																X					
Housing needs of farmworkers																				X	
Housing needs generated by a university within the jurisdiction	X	X	X																		
Units lost during a state of emergency that have yet to be replaced	X																				
The region’s GHG targets	X							X	X									X			X
Increased housing supply and affordability				X	X	X	X				X					X					
Environmental justice													X				X	X			
Jobs-housing balance	X							X	X										X		
Affordability balance				X				X		X		X							X		
Affirmatively Further Fair Housing													X				X				
Have Data																					
Information needed																					

Raw Survey Results

The following pages contain complete, raw Survey results from each response submitted.

Preparer Information

Jurisdiction: City of Firebaugh

Survey Respondent Name: Karl Schoettler

Survey Respondent Title: City Planning Consultant

6TH CYCLE RHNP REQUIRED OBJECTIVES AND FACTORS

Q11

No

Are there additional data points that are important to consider in developing the Fresno COG RHNP, particularly those measuring equity or opportunity in the context of furthering of environmental justice and Affirmatively Furthering Fair Housing?

HOUSING OPPORTUNITIES AND CONSTRAINTS

Q12

Which of the following apply to your jurisdiction as either an opportunity or a constraint for development of additional housing by 2030? You can **indicate** that something is both an opportunity and a constraint, or leave both boxes unchecked if the issue does not have an impact on housing development in your jurisdiction. Check all that apply.

Availability of water suitable for consumption	Opportunity
Sewer Capacity	Opportunity
Suitable land availability	Opportunity
Lands protected by federal or State programs	Opportunity
County policies to preserve agricultural land	Opportunity
Availability of schools	Opportunity
Availability of parks	Opportunity
Availability of public or social services	Opportunity
Impact of climate change and natural hazards	Constraint
Construction costs	Opportunity
Availability of construction workforce	Constraint
Availability of surplus public land	Constraint
Availability of vacant land	Opportunity
Financing/funding for affordable housing	Opportunity
Weak market conditions	Opportunity
Utility connection fees	Opportunity
State requirements to reduce Vehicle Miles Traveled (VMT)	Constraint

Q13

The location and type of housing can play a key role in meeting State and regional targets to reduce greenhouse gas (GHG) emissions. What land use policies or strategies has your jurisdiction implemented to minimize GHG emissions? Check all that apply.

Investment in pedestrian, bicycle, and active transportation infrastructure,

Land use changes that encourage a diversity of housing types and/or mixed-use development,

Changes to parking requirements for new residential and/or commercial construction

Q14

Does your jurisdiction collect data on homelessness within the jurisdiction and demand for transitional housing for those experiencing homelessness?

No

Q15

What are the primary barriers or gaps your jurisdiction faces in meeting its RHNA goals for producing housing affordable to very low- and low-income households?

Check all that apply.

Local gap financing for affordable housing development

Q16

Over the course of a typical year, is there a need in your jurisdiction for housing for farmworkers?

Yes,

If so, what is the total existing need for housing units for farmworkers in your jurisdiction, what portion of this need is currently unmet, what type of housing is lacking, and what is the data source for this information?:

Unknown.

Q17

If your jurisdiction is not currently meeting the demand for farmworker housing, what are the main reasons for this unmet demand?

Lack of gap financing for affordable housing development

QUESTIONS ABOUT FAIR HOUSING ISSUES, GOALS, AND ACTIONS

Q18

Which of the following factors contribute to fair housing issues in your jurisdiction?

Check all that apply.

The availability of affordable units in a range of sizes (especially larger units),

Deteriorated or abandoned properties,

Lack of private investments in low-income neighborhoods and/or communities of color, including services or amenities,

Access to financial services,

Location of employers,

Availability, frequency, and reliability of public transit,

Access to healthcare facilities and medical services,

Access to grocery stores and healthy food options,

Creation and retention of high-quality jobs,

Range of job opportunities available,

CEQA and the land use entitlement process

Q19

What actions has your jurisdiction taken to overcome historical patterns of segregation or remove barriers to equal housing opportunity?

Check all that apply.

Support for the development of affordable housing for special needs populations (seniors, the disabled, those experiencing homelessness, those with mental health and/or substance abuse issues, etc.),

Support for the development of affordable housing on publicly-owned land,

Providing financial support or other resources for low-income home buyers,

Funding rehabilitation and accessibility improvements for low-income homeowners

Q20

Which of the following policies, programs, or actions does your jurisdiction use to prevent or mitigate the displacement of low-income households?

Check all that apply:

Respondent skipped this question

Preparer Information

Jurisdiction: City of Coalinga

Survey Respondent Name: Sean Brewer

Survey Respondent Title: Assistant City Manager

6TH CYCLE RHNP REQUIRED OBJECTIVES AND FACTORS

Q11 **No**

Are there additional data points that are important to consider in developing the Fresno COG RHNP, particularly those measuring equity or opportunity in the context of furthering of environmental justice and Affirmatively Furthering Fair Housing?

HOUSING OPPORTUNITIES AND CONSTRAINTS

Q12

Which of the following apply to your jurisdiction as either an opportunity or a constraint for development of additional housing by 2030? You can indicate that something is both an opportunity and a constraint, or leave both boxes unchecked if the issue does not have an impact on housing development in your jurisdiction. Check all that apply.

Availability of water suitable for consumption	Constraint
Sewer Capacity	Constraint
Suitable land availability	Opportunity
Lands protected by federal or State programs	Constraint
County policies to preserve agricultural land	Constraint
Availability of schools	Constraint
Availability of parks	Constraint
Availability of public or social services	Constraint
Construction costs	Constraint
Availability of construction workforce	Constraint
Availability of surplus public land	Constraint
Availability of vacant land	Opportunity
Financing/funding for affordable housing	Opportunity, Constraint
Weak market conditions	Opportunity, Constraint
Utility connection fees	Constraint
State requirements to reduce Vehicle Miles Traveled (VMT)	Constraint

Q13

The location and type of housing can play a key role in meeting State and regional targets to reduce greenhouse gas (GHG) emissions. What land use policies or strategies has your jurisdiction implemented to minimize GHG emissions?

Check all that apply.

Investment in pedestrian, bicycle, and active transportation infrastructure

Q14

Does your jurisdiction collect data on homelessness within the jurisdiction and demand for transitional housing for those experiencing homelessness?

No

Q15

What are the primary barriers or gaps your jurisdiction faces in meeting its RHNA goals for producing housing affordable to very low- and low-income households?

Check all that apply.

Local gap financing for affordable housing development,
Other (please specify):
Federal and State funding availability. These developments are market driven. Projects do not pencil out without significant subsidy.

Q16

Over the course of a typical year, is there a need in your jurisdiction for housing for farmworkers?

Yes,
If so, what is the total existing need for housing units for farmworkers in your jurisdiction, what portion of this need is currently unmet, what type of housing is lacking, and what is the data source for this information?:
Unsure of the need but many are utilizing the local motels/hotels for accommodations. These are seasonal so permanent farmworker housing may not be as in high demand.

Q17

If your jurisdiction is not currently meeting the demand for farmworker housing, what are the main reasons for this unmet demand?

Other (please specify):
Federal and State funding availability. These developments are market driven. Projects do not pencil out without significant subsidy.

QUESTIONS ABOUT FAIR HOUSING ISSUES, GOALS, AND ACTIONS

Q18

Which of the following factors contribute to fair housing issues in your jurisdiction?

Check all that apply.

Other (please explain):
Not aware of any unfair housing concerns that have been addressed to the City. Unable to specify particular concerns.

Q19

What actions has your jurisdiction taken to overcome historical patterns of segregation or remove barriers to equal housing opportunity?

Check all that apply.

Support for the development of larger affordable housing units that can accommodate families (2- and 3-bedroom units, or larger),

Support for the development of affordable housing for special needs populations (seniors, the disabled, those experiencing homelessness, those with mental health and/or substance abuse issues, etc.)

Q20

Which of the following policies, programs, or actions does your jurisdiction use to prevent or mitigate the displacement of low-income households?

Check all that apply:

Respondent skipped this question

Preparer Information

Jurisdiction: City of Clovis

Survey Respondent Name: Dave Merchen

Survey Respondent Title: City Planner

6TH CYCLE RHNP REQUIRED OBJECTIVES AND FACTORS

Q11 **No**

Are there additional data points that are important to consider in developing the Fresno COG RHNP, particularly those measuring equity or opportunity in the context of furthering of environmental justice and Affirmatively Furthering Fair Housing?

HOUSING OPPORTUNITIES AND CONSTRAINTS

Q12

Which of the following apply to your jurisdiction as either an opportunity or a constraint for development of additional housing by 2030? You can indicate that something is both an opportunity and a constraint, or leave both boxes unchecked if the issue does not have an impact on housing development in your jurisdiction. Check all that apply.

- | | |
|---|--------------------------------|
| Sewer Capacity | Opportunity, Constraint |
| Financing/funding for affordable housing | Constraint |
| State requirements to reduce Vehicle Miles Traveled (VMT) | Opportunity, Constraint |

Please explain any opportunities and/or constraints listed above, and/or list any additional opportunities or constraints.

Sewer infrastructure capacity within designated service areas can function as either an opportunity or a constraint depending on location. Limitations on the availability of funding for affordable housing projects functions is a limitation on the number of affordable projects that can be constructed. Absent funding, such projects have generally not proven to be feasible. The transition to the use of VMT as the metric to measure transportation impacts under CEQA has caused an increase in the time and cost of housing development projects which are outside the core areas of the City. Where this is the case, VMT is a constraint. For certain infill projects, the use of VMT can serve as a opportunity to streamline projects.

Q13

The location and type of housing can play a key role in meeting State and regional targets to reduce greenhouse gas (GHG) emissions. What land use policies or strategies has your jurisdiction implemented to minimize GHG emissions?

Check all that apply.

Energy efficiency standards in new construction or retrofits,

Investment in transit expansion,

Investment in maintaining or improving existing public transportation infrastructure,

Investment in pedestrian, bicycle, and active transportation infrastructure,

Land use changes that encourage a diversity of housing types and/or mixed-use development,

Increasing local employment opportunities to reduce commute lengths for residents

Q14

Does your jurisdiction collect data on homelessness within the jurisdiction and demand for transitional housing for those experiencing homelessness?

Yes,

If so, please provide an estimate for the local homeless population and corresponding need for transitional housing.:

30 (estimate)

Q15

What are the primary barriers or gaps your jurisdiction faces in meeting its RHNA goals for producing housing affordable to very low- and low-income households?

Check all that apply.

Local gap financing for affordable housing development,

Local affordable housing development capacity

Q16

Over the course of a typical year, is there a need in your jurisdiction for housing for farmworkers?

No

Q17

If your jurisdiction is not currently meeting the demand for farmworker housing, what are the main reasons for this unmet demand?

Respondent skipped this question

QUESTIONS ABOUT FAIR HOUSING ISSUES, GOALS, AND ACTIONS

Q18

Which of the following factors contribute to fair housing issues in your jurisdiction?

Check all that apply.

Availability, frequency, and reliability of public transit

Q19

What actions has your jurisdiction taken to overcome historical patterns of segregation or remove barriers to equal housing opportunity?

Check all that apply.

Land use changes to allow a greater variety of housing types,

Dedicated local funding source for affordable housing development,

Support for affordable housing development near transit,

Support for the development of larger affordable housing units that can accommodate families (2- and 3-bedroom units, or larger),

Support for the development of affordable housing for special needs populations (seniors, the disabled, those experiencing homelessness, those with mental health and/or substance abuse issues, etc.),

Support for the development of affordable housing on publicly-owned land,

Exploring partnerships with Community Development Financial Institutions, large regional employers, and investors to add to the financial resources available for the creation and preservation of deed-restricted affordable housing units,

Funding and supporting outreach services for homeowners and renters at risk of losing their homes and/or experiencing fair housing impediments,

Providing financial support or other resources for low-income home buyers,

Funding rehabilitation and accessibility improvements for low-income homeowners,

Streamlining entitlements processes and/or removing development fees for affordable housing construction,

Ensuring affirmative marketing of affordable housing is targeted to all segments of the community,

Implementing a rent stabilization policy and staffing a rent stabilization board,

Other (please specify):

The above actions implemented by the City were taken with the goal of promoting the supply of housing.

Q20

Which of the following policies, programs, or actions does your jurisdiction use to prevent or mitigate the displacement of low-income households?

Check all that apply:

Rent stabilization/rent control	In Use
Mobile home rent control	In Use
Foreclosure assistance	In Use
Promoting streamlined processing of ADUs	In Use
Fair housing legal services	In Use
Housing counseling	In Use

Preparer Information

Jurisdiction: City of Selma

Survey Respondent Name: Fernando Santillan

Survey Respondent Title: Community Development Director

6TH CYCLE RHNP REQUIRED OBJECTIVES AND FACTORS

Q11

Are there additional data points that are important to consider in developing the Fresno COG RHNP, particularly those measuring equity or opportunity in the context of furthering of environmental justice and Affirmatively Furthering Fair Housing?

Yes,

If so, please specify:

Not specific to environmental justice or Affirmatively Furthering Fair Housing, but would be good to incorporate data regarding rates of relocation to the region from other areas such as Bay Area and SoCal, particularly during the pandemic (and in general) - if that type of data is available.

HOUSING OPPORTUNITIES AND CONSTRAINTS

Q12

Which of the following apply to your jurisdiction as either an opportunity or a constraint for development of additional housing by 2030? You can indicate that something is both an opportunity and a constraint, or leave both boxes unchecked if the issue does not have an impact on housing development in your jurisdiction. Check all that apply.

Sewer Capacity

Constraint

Suitable land availability

Opportunity

Availability of parks

Constraint

Financing/funding for affordable housing

Constraint

Please explain any opportunities and/or constraints listed above, and/or list any additional opportunities or constraints.

Sewer capacity is currently the single most significant constraint impacting new housing development in Selma. Financing/funding for affordable housing is also a constraint as there are not many developers in the area willing to build deed-restricted multifamily units that would meet affordability guidelines. Selma is lacking in sufficient park space and new housing projects will need to incorporate adequate park facilities or pay significant park development impact fees, which raises costs for projects.

Q13

The location and type of housing can play a key role in meeting State and regional targets to reduce greenhouse gas (GHG) emissions. What land use policies or strategies has your jurisdiction implemented to minimize GHG emissions?

Check all that apply.

Investment in maintaining or improving existing public transportation infrastructure,

Investment in pedestrian, bicycle, and active transportation infrastructure,

Land use changes that encourage a diversity of housing types and/or mixed-use development

Q14

Does your jurisdiction collect data on homelessness within the jurisdiction and demand for transitional housing for those experiencing homelessness?

No,

If so, please provide an estimate for the local homeless population and corresponding need for transitional housing.:
We do not currently collect homeless population data, but the current growth in the homeless population will most likely cause us to begin doing so fairly soon.

Q15

What are the primary barriers or gaps your jurisdiction faces in meeting its RHNA goals for producing housing affordable to very low- and low-income households?

Check all that apply.

Local gap financing for affordable housing development,

Community opposition,

Lack of requisite infrastructure, such as sewer and water

Q16

Over the course of a typical year, is there a need in your jurisdiction for housing for farmworkers?

Respondent skipped this question

Q17

If your jurisdiction is not currently meeting the demand for farmworker housing, what are the main reasons for this unmet demand?

Respondent skipped this question

QUESTIONS ABOUT FAIR HOUSING ISSUES, GOALS, AND ACTIONS

Q18

Which of the following factors contribute to fair housing issues in your jurisdiction?

Check all that apply.

Community opposition to proposed or existing developments,

Land use and zoning laws, such as minimum lot sizes, limits on multi-unit properties, height limits, or minimum parking requirements,

Location of affordable housing,

Deteriorated or abandoned properties,

Availability, frequency, and reliability of public transit

Q19

What actions has your jurisdiction taken to overcome historical patterns of segregation or remove barriers to equal housing opportunity?

Check all that apply.

Land use changes to allow a greater variety of housing types,

Support for affordable housing development near transit,

Support for the development of larger affordable housing units that can accommodate families (2- and 3-bedroom units, or larger),

Support for the development of affordable housing for special needs populations (seniors, the disabled, those experiencing homelessness, those with mental health and/or substance abuse issues, etc.)

Q20

Which of the following policies, programs, or actions does your jurisdiction use to prevent or mitigate the displacement of low-income households?

Check all that apply:

Promoting streamlined processing of ADUs

Potential Council/Board Interest

Preparer Information

Jurisdiction: City of Selma

Survey Respondent Name: Teresa Gallavan

Survey Respondent Title: City Manager

6TH CYCLE RHNP REQUIRED OBJECTIVES AND FACTORS

Q11

No

Are there additional data points that are important to consider in developing the Fresno COG RHNP, particularly those measuring equity or opportunity in the context of furthering of environmental justice and Affirmatively Furthering Fair Housing?

HOUSING OPPORTUNITIES AND CONSTRAINTS

Q12

Which of the following apply to your jurisdiction as either an opportunity or a constraint for development of additional housing by 2030? You can indicate that something is both an opportunity and a constraint, or leave both boxes unchecked if the issue does not have an impact on housing development in your jurisdiction. Check all that apply.

Availability of water suitable for consumption	Opportunity
Sewer Capacity	Constraint
Suitable land availability	Opportunity
Availability of schools	Constraint
Availability of parks	Constraint
Availability of public or social services	Constraint
Availability of vacant land	Opportunity
Financing/funding for affordable housing	Opportunity
State requirements to reduce Vehicle Miles Traveled (VMT)	Constraint

Q13

The location and type of housing can play a key role in meeting State and regional targets to reduce greenhouse gas (GHG) emissions. What land use policies or strategies has your jurisdiction implemented to minimize GHG emissions?

Check all that apply.

- Energy efficiency standards in new construction or retrofits,
- Investment in transit expansion,
- Investment in maintaining or improving existing public transportation infrastructure,
- Investment in pedestrian, bicycle, and active transportation infrastructure,
- Land use changes that encourage a diversity of housing types and/or mixed-use development,
- Land use changes to allow greater density near transit,
- Increasing local employment opportunities to reduce commute lengths for residents

Q14

Does your jurisdiction collect data on homelessness within the jurisdiction and demand for transitional housing for those experiencing homelessness?

- Yes,
If so, please provide an estimate for the local homeless population and corresponding need for transitional housing.:
100+

Q15

What are the primary barriers or gaps your jurisdiction faces in meeting its RHNA goals for producing housing affordable to very low- and low-income households?

Check all that apply.

- Community opposition,
- Lack of requisite infrastructure, such as sewer and water

Q16

Over the course of a typical year, is there a need in your jurisdiction for housing for farmworkers?

No

Q17

If your jurisdiction is not currently meeting the demand for farmworker housing, what are the main reasons for this unmet demand?

Respondent skipped this question

QUESTIONS ABOUT FAIR HOUSING ISSUES, GOALS, AND ACTIONS

Q18

Which of the following factors contribute to fair housing issues in your jurisdiction?

Check all that apply.

Community opposition to proposed or existing developments,

Displacement of residents due to increased rents or other economic pressures,

The availability of affordable units in a range of sizes (especially larger units),

Deteriorated or abandoned properties,

Lack of community revitalization strategies,

Lack of private investments in low-income neighborhoods and/or communities of color, including services or amenities,

Location of environmental health hazards, such as factories or agricultural production,

Access to grocery stores and healthy food options,

Creation and retention of high-quality jobs,

Range of job opportunities available

Q19

What actions has your jurisdiction taken to overcome historical patterns of segregation or remove barriers to equal housing opportunity?

Check all that apply.

Land use changes to allow a greater variety of housing types,

Support for affordable housing development near transit,

Funding and supporting outreach services for homeowners and renters at risk of losing their homes and/or experiencing fair housing impediments

Q20

Which of the following policies, programs, or actions does your jurisdiction use to prevent or mitigate the displacement of low-income households? Check all that apply:

Promoting streamlined processing of ADUs

In Use

Fair housing legal services

In Use

Preparer Information

Jurisdiction: City of Orange Cove
Survey Respondent Name: Angela Hall
Survey Respondent Title: Assistant Engineer

Jurisdiction Contact Information

Contact: Rudy Hernandez, Interim City Manager
Phone #: (559) 626-4488
Email: Rudy@cityoforangecove.com

6TH CYCLE RHNP REQUIRED OBJECTIVES AND FACTORS

Q11 **No**

Are there additional data points that are important to consider in developing the Fresno COG RHNP, particularly those measuring equity or opportunity in the context of furthering of environmental justice and Affirmatively Furthering Fair Housing?

HOUSING OPPORTUNITIES AND CONSTRAINTS

Q12

Which of the following apply to your jurisdiction as either an opportunity or a constraint for development of additional housing by 2030? You can indicate that something is both an opportunity and a constraint, or leave both boxes unchecked if the issue does not have an impact on housing development in your jurisdiction. Check all that apply.

Availability of water suitable for consumption	Opportunity
Sewer Capacity	Opportunity
Suitable land availability	Constraint
Lands protected by federal or State programs	Opportunity
County policies to preserve agricultural land	Opportunity
Availability of schools	Opportunity
Availability of parks	Constraint
Availability of public or social services	Constraint
Impact of climate change and natural hazards	Opportunity
Construction costs	Constraint
Availability of construction workforce	Constraint
Availability of surplus public land	Constraint
Availability of vacant land	Constraint
Financing/funding for affordable housing	Constraint

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Weak market conditions	Constraint
Project labor agreements	Constraint
Utility connection fees	Opportunity
State requirements to reduce Vehicle Miles Traveled (VMT)	Constraint

Q13

The location and type of housing can play a key role in meeting State and regional targets to reduce greenhouse gas (GHG) emissions. What land use policies or strategies has your jurisdiction implemented to minimize GHG emissions?

Check all that apply.

- Investment in pedestrian, bicycle, and active transportation infrastructure,
 - Land use changes that encourage a diversity of housing types and/or mixed-use development
-

Q14

Does your jurisdiction collect data on homelessness within the jurisdiction and demand for transitional housing for those experiencing homelessness?

No

Q15

What are the primary barriers or gaps your jurisdiction faces in meeting its RHNA goals for producing housing affordable to very low- and low-income households?

Check all that apply.

- Local gap financing for affordable housing development,
 - Local affordable housing development capacity,
 - Availability of land
-

Q16

Over the course of a typical year, is there a need in your jurisdiction for housing for farmworkers?

Yes,
If so, what is the total existing need for housing units for farmworkers in your jurisdiction, what portion of this need is currently unmet, what type of housing is lacking, and what is the data source for this information?:
Approximately 47 SFD units.

Q17

If your jurisdiction is not currently meeting the demand for farmworker housing, what are the main reasons for this unmet demand?

- Lack of gap financing for affordable housing development,
- Local affordable housing development capacity,
- Availability of land

QUESTIONS ABOUT FAIR HOUSING ISSUES, GOALS, AND ACTIONS

Q18

Which of the following factors contribute to fair housing issues in your jurisdiction?

Check all that apply.

Displacement of low-income residents and/or residents of color,

Occupancy standards that limit the number of people in a unit,

Location of affordable housing,

The availability of affordable units in a range of sizes (especially larger units),

Deteriorated or abandoned properties,

Lack of community revitalization strategies,

Lack of private investments in low-income neighborhoods and/or communities of color, including services or amenities,

Access to financial services,

Access to healthcare facilities and medical services,

Access to grocery stores and healthy food options,

Creation and retention of high-quality jobs,

Range of job opportunities available

Q19

What actions has your jurisdiction taken to overcome historical patterns of segregation or remove barriers to equal housing opportunity?

Check all that apply.

Support for affordable housing development near transit,

Providing financial support or other resources for low-income home buyers

Q20

Which of the following policies, programs, or actions does your jurisdiction use to prevent or mitigate the displacement of low-income households?

Check all that apply:

Promoting streamlined processing of ADUs

Potential Council/Board Interest

Preparer Information

Jurisdiction: City of Fresno

Survey Respondent Name: Yvette Quiroga

Survey Respondent Title: Senior Staff Analyst

6TH CYCLE RHNP REQUIRED OBJECTIVES AND FACTORS

Q11 **No**

Are there additional data points that are important to consider in developing the Fresno COG RHNP, particularly those measuring equity or opportunity in the context of furthering of environmental justice and Affirmatively Furthering Fair Housing?

HOUSING OPPORTUNITIES AND CONSTRAINTS

Q12

Which of the following apply to your jurisdiction as either an opportunity or a constraint for development of additional housing by 2030? You can indicate that something is both an opportunity and a constraint, or leave both boxes unchecked if the issue does not have an impact on housing development in your jurisdiction. Check all that apply.

Availability of water suitable for consumption	Constraint
Sewer Capacity	Constraint
Suitable land availability	Constraint
Lands protected by federal or State programs	Constraint
County policies to preserve agricultural land	Constraint
Availability of schools	Constraint
Availability of parks	Constraint
Availability of public or social services	Constraint
Impact of climate change and natural hazards	Constraint
Construction costs	Constraint
Availability of construction workforce	Constraint
Availability of surplus public land	Constraint
Availability of vacant land	Constraint
Financing/funding for affordable housing	Constraint
Utility connection fees	Constraint
State requirements to reduce Vehicle Miles Traveled (VMT)	Constraint

Q13

Respondent skipped this question

The location and type of housing can play a key role in meeting State and regional targets to reduce greenhouse gas (GHG) emissions. What land use policies or strategies has your jurisdiction implemented to minimize GHG emissions?

Check all that apply.

Q14

No

Does your jurisdiction collect data on homelessness within the jurisdiction and demand for transitional housing for those experiencing homelessness?

Q15

Local gap financing for affordable housing development,
Local affordable housing development capacity,
Availability of land,
Lack of requisite infrastructure, such as sewer and water

What are the primary barriers or gaps your jurisdiction faces in meeting its RHNA goals for producing housing affordable to very low- and low-income households?

Check all that apply.

Q16

Yes,
If so, what is the total existing need for housing units for farmworkers in your jurisdiction, what portion of this need is currently unmet, what type of housing is lacking, and what is the data source for this information?:
The County is lacking all types of housing including Farmworker housing. Zillow No particular data source.

Over the course of a typical year, is there a need in your jurisdiction for housing for farmworkers?

Q17

Lack of gap financing for affordable housing development,
Local affordable housing development capacity,
Lack of requisite infrastructure, such as sewer and water,
Regulatory requirements relating to on-farm housing

If your jurisdiction is not currently meeting the demand for farmworker housing, what are the main reasons for this unmet demand?

QUESTIONS ABOUT FAIR HOUSING ISSUES, GOALS, AND ACTIONS

Q18

Which of the following factors contribute to fair housing issues in your jurisdiction?

Check all that apply.

Community opposition to proposed or existing developments,

Displacement of residents due to increased rents or other economic pressures,

Displacement of low-income residents and/or residents of color,

Location of affordable housing,

The availability of affordable units in a range of sizes (especially larger units),

Deteriorated or abandoned properties,

Lack of private investments in low-income neighborhoods and/or communities of color, including services or amenities,

Access to financial services,

Lending discrimination,

Location of environmental health hazards, such as factories or agricultural production,

Range of job opportunities available,

Private discrimination, such as residential real estate "steering"

Q19

What actions has your jurisdiction taken to overcome historical patterns of segregation or remove barriers to equal housing opportunity?

Check all that apply.

Dedicated local funding source for affordable housing development,

Support for the development of larger affordable housing units that can accommodate families (2- and 3-bedroom units, or larger),

Support for the development of affordable housing for special needs populations (seniors, the disabled, those experiencing homelessness, those with mental health and/or substance abuse issues, etc.),

Providing financial support or other resources for low-income home buyers,

Funding rehabilitation and accessibility improvements for low-income homeowners,

Ensuring affirmative marketing of affordable housing is targeted to all segments of the community

Q20

Which of the following policies, programs, or actions does your jurisdiction use to prevent or mitigate the displacement of low-income households?

Promoting streamlined processing of ADUs

Under Council/Board Consideration

Check all that apply:

Preparer Information

Jurisdiction: City of Reedley

Survey Respondent Name: Ellen Moore

Survey Respondent Title: Senior Planner

6TH CYCLE RHNP REQUIRED OBJECTIVES AND FACTORS

Q11

No

Are there additional data points that are important to consider in developing the Fresno COG RHNP, particularly those measuring equity or opportunity in the context of furthering of environmental justice and Affirmatively Furthering Fair Housing?

HOUSING OPPORTUNITIES AND CONSTRAINTS

Q12

Which of the following apply to your jurisdiction as either an opportunity or a constraint for development of additional housing by 2030? You can indicate that something is both an opportunity and a constraint, or leave both boxes unchecked if the issue does not have an impact on housing development in your jurisdiction. Check all that apply.

Availability of water suitable for consumption	Constraint
Sewer Capacity	Opportunity
Suitable land availability	Constraint
Lands protected by federal or State programs	Opportunity, Constraint
County policies to preserve agricultural land	Opportunity, Constraint
Availability of schools	Constraint
Availability of parks	Constraint
Availability of public or social services	Opportunity
Impact of climate change and natural hazards	Constraint
Construction costs	Constraint
Availability of construction workforce	Constraint
Availability of surplus public land	Constraint
Availability of vacant land	Constraint
Financing/funding for affordable housing	Opportunity, Constraint
Weak market conditions	Constraint
Utility connection fees	Constraint

State requirements to reduce Vehicle Miles Traveled (VMT)

Constraint

Please explain any opportunities and/or constraints listed above, and/or list any additional opportunities or constraints.

Lands protected by federal or State programs: opportunity to encourage infill development; constraint if infill parcels not adequate size or feasible for proposed housing project(s)

County policies to preserve agricultural land: opportunity to encourage infill development, which Reedley has been in support of by not annexing additional lands unless at least 80% of residential land inside City Limits is developed; constraint because annexing property into the City will extend the timeline for housing projects

Financing/funding for affordable housing: opportunity because funding sources are available, but it is also a constraint because there is not enough funding to develop enough housing units in Reedley that would count towards RHNA State requirements to reduce Vehicle Miles Traveled (VMT) may extend the CEQA compliance timeline for small cities like Reedley which could delay housing production

Q13

The location and type of housing can play a key role in meeting State and regional targets to reduce greenhouse gas (GHG) emissions. What land use policies or strategies has your jurisdiction implemented to minimize GHG emissions?

Check all that apply.

Investment in pedestrian, bicycle, and active transportation infrastructure,

Land use changes that encourage a diversity of housing types and/or mixed-use development,

Other (please specify):

Implementation of California Energy Code

Q14

Does your jurisdiction collect data on homelessness within the jurisdiction and demand for transitional housing for those experiencing homelessness?

Yes,

If so, please provide an estimate for the local homeless population and corresponding need for transitional housing.:

There are approximately 30 persons identified as being homeless within the jurisdiction. The specific need for transitional housing is unknown at this time.

Q15

What are the primary barriers or gaps your jurisdiction faces in meeting its RHNA goals for producing housing affordable to very low- and low-income households?

Check all that apply.

Land use and zoning laws, such as minimum lot sizes, limits on multi-unit properties, height limits, or minimum parking requirements,

Local gap financing for affordable housing development,

Local affordable housing development capacity,

Availability of land,

Community opposition,

Lack of requisite infrastructure, such as sewer and water

Q16

Over the course of a typical year, is there a need in your jurisdiction for housing for farmworkers?

Yes,

If so, what is the total existing need for housing units for farmworkers in your jurisdiction, what portion of this need is currently unmet, what type of housing is lacking, and what is the data source for this information?:

According to the 2019 American Community Survey, 2,846 civilians were reported to be in the agriculture, forestry, fishing and hunting, and mining industry, which is 30 percent of Reedley's total employment (9,483). There are opportunities for single family and multi-family units for lower income households, however according to a Market Study prepared on March 4, 2020 by Novogradac for the Reedley Village Phase II Apartments, the vast majority of the area's affordable housing developments maintain high occupancy rates and maintain waiting lists. The City of Reedley is not aware of farm employee housing provided by employers within the jurisdiction.

Q17

If your jurisdiction is not currently meeting the demand for farmworker housing, what are the main reasons for this unmet demand?

Land use and zoning laws, such as minimum lot sizes, limits on multi-unit properties, height limits, or minimum parking requirements,

Lack of gap financing for affordable housing development,

**Local affordable housing development capacity,
Availability of land,**

Community opposition,

Lack of requisite infrastructure, such as sewer and water,

Regulatory requirements relating to on-farm housing

QUESTIONS ABOUT FAIR HOUSING ISSUES, GOALS, AND ACTIONS

Q18

Which of the following factors contribute to fair housing issues in your jurisdiction?

Check all that apply.

Community opposition to proposed or existing developments,

Land use and zoning laws, such as minimum lot sizes, limits on multi-unit properties, height limits, or minimum parking requirements,

Location of affordable housing,

The availability of affordable units in a range of sizes (especially larger units),

Deteriorated or abandoned properties,

Lack of private investments in low-income neighborhoods and/or communities of color, including services or amenities,

Access to financial services,

Location of employers,

Availability, frequency, and reliability of public transit,

Access to grocery stores and healthy food options,

Creation and retention of high-quality jobs,

Range of job opportunities available,

CEQA and the land use entitlement process

Q19

What actions has your jurisdiction taken to overcome historical patterns of segregation or remove barriers to equal housing opportunity?

Check all that apply.

Land use changes to allow a greater variety of housing types,

Support for the development of larger affordable housing units that can accommodate families (2- and 3-bedroom units, or larger),

Support for the development of affordable housing for special needs populations (seniors, the disabled, those experiencing homelessness, those with mental health and/or substance abuse issues, etc.),

Support for the development of affordable housing on publicly-owned land,

Streamlining entitlements processes and/or removing development fees for affordable housing construction,

Other (please specify):

Directing customers to rehabilitation and accessibility improvement programs for low-income homeowners by referring them to the Fresno County HOME Program

Q20

Which of the following policies, programs, or actions does your jurisdiction use to prevent or mitigate the displacement of low-income households?

Promoting streamlined processing of ADUs

In Use

Check all that apply:

Preparer Information

Jurisdiction: City of Fresno

Survey Respondent Name: Sophia Pagoulatos

Survey Respondent Title: Planning Manager

6TH CYCLE RHNP REQUIRED OBJECTIVES AND FACTORS

Q11

No

Are there additional data points that are important to consider in developing the Fresno COG RHNP, particularly those measuring equity or opportunity in the context of furthering of environmental justice and Affirmatively Furthering Fair Housing?

HOUSING OPPORTUNITIES AND CONSTRAINTS

Q12

Which of the following apply to your jurisdiction as either an opportunity or a constraint for development of additional housing by 2030? You can indicate that something is both an opportunity and a constraint, or leave both boxes unchecked if the issue does not have an impact on housing development in your jurisdiction. Check all that apply.

Availability of water suitable for consumption	Opportunity, Constraint
Suitable land availability	Opportunity, Constraint
County policies to preserve agricultural land	Constraint
Availability of schools	Opportunity, Constraint
Availability of parks	Constraint
Availability of public or social services	Constraint
Impact of climate change and natural hazards	Opportunity
Construction costs	Constraint
Availability of construction workforce	Constraint
Availability of surplus public land	Constraint
Availability of vacant land	Constraint
Financing/funding for affordable housing	Constraint
State requirements to reduce Vehicle Miles Traveled (VMT)	Constraint

Please explain any opportunities and/or constraints listed above, and/or list any additional opportunities or constraints.
Note: if item is left blank, above, it's not an issue.

Water: the City has more water than most neighboring jurisdictions, and yet the supply is not infinite and conservation is still needed. Also the city is banking groundwater.

1. **Suitable land availability:** the city has more land available than most, but parcels are often small and irregular.

2. **County policies to preserve ag land:** this constrains the amount of land available for housing as Fresno grows

3. **Availability of schools:** although Fresno has a fair amount of educational infrastructure, some areas have overcrowded schools, and some builders avoid Fresno Unified School District due to real or perceived lower quality

4. **Availability of parks:** Fresno's Parks Master Plan identified gaps of the city which are not within a 10-minute walk of a park and also found Fresno's parks to be poorly maintained and out of date.

5. **Availability of social or public services:** we have heard from stakeholders that Fresno's public services are difficult to access

6. **Impact of climate change:** this was stated as an opportunity because Fresno does not bear the burden of increased wildfire risk since it is an urbanized area, and has adequate flood infrastructure.

7. **Construction Costs/availability of construction workforce:** costs are high and labor is in short supply for the current level of demand

8. **Surplus public land:** I think the city only has 5 sites that meet the definition;

9. **Availability of vacant land:** although the city has a fair amount of vacant land, currently annexation is not possible as it is contingent on the city and county renegotiating their tax-sharing MOU

10. **Financing for affordable housing:** this is always in short supply;

11. **VMT Requirements:** several housing projects (mainly subdivisions) have been delayed due to the new VMT requirements and lack of fully developed citywide or regional mitigation options (in progress).

Q13

The location and type of housing can play a key role in meeting State and regional targets to reduce greenhouse gas (GHG) emissions. What land use policies or strategies has your jurisdiction implemented to minimize GHG emissions?

Check all that apply.

- Energy efficiency standards in new construction or retrofits,
- Investment in transit expansion,
- Investment in maintaining or improving existing public transportation infrastructure,
- Investment in pedestrian, bicycle, and active transportation infrastructure,
- Land use changes that encourage a diversity of housing types and/or mixed-use development,
- Land use changes to allow greater density near transit,
- Incentives or policies to encourage housing development on vacant or underutilized land near transit,
- Changes to parking requirements for new residential and/or commercial construction

Q14

Does your jurisdiction collect data on homelessness within the jurisdiction and demand for transitional housing for those experiencing homelessness?

Yes,
If so, please provide an estimate for the local homeless population and corresponding need for transitional housing.: **Last year the Point in Time count of persons experiencing homelessness resulted in a total of 2,510 persons. There are currently 1,454 emergency beds available, but we would maintain that the demand for transitional housing is estimated at 2,510. The city is in the process of completing several motel conversions to meet this need.**

Q15

What are the primary barriers or gaps your jurisdiction faces in meeting its RHNA goals for producing housing affordable to very low- and low-income households?

Check all that apply.

- Local gap financing for affordable housing development,
- Local affordable housing development capacity,
- Availability of land,
- Community opposition

Q16

Over the course of a typical year, is there a need in your jurisdiction for housing for farmworkers?

If so, what is the total existing need for housing units for farmworkers in your jurisdiction, what portion of this need is currently unmet, what type of housing is lacking, and what is the data source for this information?:
We do not know the farmworker housing demand.

Q17

If your jurisdiction is not currently meeting the demand for farmworker housing, what are the main reasons for this unmet demand?

Other (please specify):
We are not aware of demand for farmworker housing

QUESTIONS ABOUT FAIR HOUSING ISSUES, GOALS, AND ACTIONS

Q18

Which of the following factors contribute to fair housing issues in your jurisdiction?

Check all that apply.

Community opposition to proposed or existing developments,

Displacement of residents due to increased rents or other economic pressures,

Location of affordable housing,

The availability of affordable units in a range of sizes (especially larger units),

Deteriorated or abandoned properties,

Lack of private investments in low-income neighborhoods and/or communities of color, including services or amenities,

Access to financial services,

Lending discrimination,

Location of employers,

Location of environmental health hazards, such as factories or agricultural production,

Access to healthcare facilities and medical services,

Access to grocery stores and healthy food options,

Creation and retention of high-quality jobs,

Range of job opportunities available,

Private discrimination, such as residential real estate "steering"

Q19

What actions has your jurisdiction taken to overcome historical patterns of segregation or remove barriers to equal housing opportunity?

Check all that apply.

Land use changes to allow a greater variety of housing types,

Dedicated local funding source for affordable housing development,

Support for affordable housing development near transit,

Support for the development of affordable housing for special needs populations (seniors, the disabled, those experiencing homelessness, those with mental health and/or substance abuse issues, etc.),

Support for the development of affordable housing on publicly-owned land,

Exploring partnerships with Community Development Financial Institutions, large regional employers, and investors to add to the financial resources available for the creation and preservation of deed-restricted affordable housing units,

Providing financial support or other resources for low-income home buyers,

Funding rehabilitation and accessibility improvements for low-income homeowners,

Providing incentives for landlords to participate in the Housing Choice Voucher program,

Financial resources or other programs to support the preservation of existing affordable housing,

Implementing policies and programs to minimize the displacement of low-income residents and residents of color,

Improving access to high quality education opportunities for vulnerable students, particularly students of color

Q20

Which of the following policies, programs, or actions does your jurisdiction use to prevent or mitigate the displacement of low-income households?

Check all that apply:

Mobile home rent control	In Use
Single-room occupancy (SRO) preservation	In Use
Condominium conversion regulations	In Use
Promoting streamlined processing of ADUs	Under Council/Board Consideration
Fair housing legal services	In Use
Housing counseling	In Use

Preparer Information

Jurisdiction: City of Fowler

Survey Respondent Name: Dawn Marple

Survey Respondent Title: City Planner

6TH CYCLE RHNP REQUIRED OBJECTIVES AND FACTORS

Q11 **No**

Are there additional data points that are important to consider in developing the Fresno COG RHNP, particularly those measuring equity or opportunity in the context of furthering of environmental justice and Affirmatively Furthering Fair Housing?

HOUSING OPPORTUNITIES AND CONSTRAINTS

Q12 Respondent skipped this question

Which of the following apply to your jurisdiction as either an opportunity or a constraint for development of additional housing by 2030? You can indicate that something is both an opportunity and a constraint, or leave both boxes unchecked if the issue does not have an impact on housing development in your jurisdiction. Check all that apply.

Q13 **Energy efficiency standards in new construction or retrofits,**

The location and type of housing can play a key role in meeting State and regional targets to reduce greenhouse gas (GHG) emissions. What land use policies or strategies has your jurisdiction implemented to minimize GHG emissions?

Check all that apply.

Investment in pedestrian, bicycle, and active transportation infrastructure,

Other (please specify):

We are currently updating our General Plan. This update will help facilitate a variety of housing densities and encourage housing development.

Q14 **No**

Does your jurisdiction collect data on homelessness within the jurisdiction and demand for transitional housing for those experiencing homelessness?

Q15 **Land use and zoning laws, such as minimum lot sizes, limits on multi-unit properties, height limits, or minimum parking requirements**

What are the primary barriers or gaps your jurisdiction faces in meeting its RHNA goals for producing housing affordable to very low- and low-income households?

Check all that apply.

Q16

Respondent skipped this question

Over the course of a typical year, is there a need in your jurisdiction for housing for farmworkers?

Q17

Respondent skipped this question

If your jurisdiction is not currently meeting the demand for farmworker housing, what are the main reasons for this unmet demand?

QUESTIONS ABOUT FAIR HOUSING ISSUES, GOALS, AND ACTIONS

Q18

Which of the following factors contribute to fair housing issues in your jurisdiction?

Check all that apply.

The availability of affordable units in a range of sizes (especially larger units),

Lack of private investments in low-income neighborhoods and/or communities of color, including services or amenities,

Availability, frequency, and reliability of public transit,

Access to grocery stores and healthy food options

Q19

What actions has your jurisdiction taken to overcome historical patterns of segregation or remove barriers to equal housing opportunity?

Check all that apply.

Land use changes to allow a greater variety of housing types,

Support for affordable housing development near transit

Q20

Which of the following policies, programs, or actions does your jurisdiction use to prevent or mitigate the displacement of low-income households?

Check all that apply:

Promoting streamlined processing of ADUs

In Use

Preparer Information

Jurisdiction: City of Kingsburg
Survey Respondent Name: Greg Collins
Survey Respondent Title: City Planner

6TH CYCLE RHNP REQUIRED OBJECTIVES AND FACTORS

Q11 **No**

Are there additional data points that are important to consider in developing the Fresno COG RHNP, particularly those measuring equity or opportunity in the context of furthering of environmental justice and Affirmatively Furthering Fair Housing?

HOUSING OPPORTUNITIES AND CONSTRAINTS

Q12

Which of the following apply to your jurisdiction as either an opportunity or a constraint for development of additional housing by 2030? You can indicate that something is both an opportunity and a constraint, or leave both boxes unchecked if the issue does not have an impact on housing development in your jurisdiction. Check all that apply.

Availability of water suitable for consumption	Opportunity
Sewer Capacity	Opportunity
Suitable land availability	Opportunity
Availability of schools	Opportunity
Availability of parks	Opportunity
Availability of public or social services	Constraint
Impact of climate change and natural hazards	Constraint
Construction costs	Constraint
Availability of construction workforce	Constraint
Availability of vacant land	Opportunity
Financing/funding for affordable housing	Constraint
State requirements to reduce Vehicle Miles Traveled (VMT)	Constraint

Please explain any opportunities and/or constraints listed above, and/or list any additional opportunities or constraints. **Kingsburg is blessed with few constraints on its sewer and water systems. Further, the city also has ample land for residential development. The city has no influence on the cost of money, funding for housing, climate change or labor or material costs. VMT issues may actually spawn better housing design and subdivision layouts.**

Q13

The location and type of housing can play a key role in meeting State and regional targets to reduce greenhouse gas (GHG) emissions. What land use policies or strategies has your jurisdiction implemented to minimize GHG emissions?

Check all that apply.

- Energy efficiency standards in new construction or retrofits,
- Investment in pedestrian, bicycle, and active transportation infrastructure,
- Land use changes that encourage a diversity of housing types and/or mixed-use development,
- Changes to parking requirements for new residential and/or commercial construction

Q14

Does your jurisdiction collect data on homelessness within the jurisdiction and demand for transitional housing for those experiencing homelessness?

No

Q15

What are the primary barriers or gaps your jurisdiction faces in meeting its RHNA goals for producing housing affordable to very low- and low-income households?

Check all that apply.

- Land use and zoning laws, such as minimum lot sizes, limits on multi-unit properties, height limits, or minimum parking requirements,
- Local gap financing for affordable housing development,
- Community opposition

Q16

Over the course of a typical year, is there a need in your jurisdiction for housing for farmworkers?

No

Q17

If your jurisdiction is not currently meeting the demand for farmworker housing, what are the main reasons for this unmet demand?

- Lack of gap financing for affordable housing development,
- Community opposition

QUESTIONS ABOUT FAIR HOUSING ISSUES, GOALS, AND ACTIONS

Q18

Which of the following factors contribute to fair housing issues in your jurisdiction?

Check all that apply.

- Community opposition to proposed or existing developments,
- Land use and zoning laws, such as minimum lot sizes, limits on multi-unit properties, height limits, or minimum parking requirements,
- Location of affordable housing,
- Availability, frequency, and reliability of public transit,
- Access to healthcare facilities and medical services,
- CEQA and the land use entitlement process

Q19

What actions has your jurisdiction taken to overcome historical patterns of segregation or remove barriers to equal housing opportunity?

Check all that apply.

Land use changes to allow a greater variety of housing types,

Support for the development of affordable housing for special needs populations (seniors, the disabled, those experiencing homelessness, those with mental health and/or substance abuse issues, etc.),

Support for the development of affordable housing on publicly-owned land,

Exploring partnerships with Community Development Financial Institutions, large regional employers, and investors to add to the financial resources available for the creation and preservation of deed-restricted affordable housing units

Q20

Which of the following policies, programs, or actions does your jurisdiction use to prevent or mitigate the displacement of low-income households?

Check all that apply:

Promoting streamlined processing of ADUs

In Use

Preparer Information

Jurisdiction: City of San Joaquin

Survey Respondent Name: Matt Flood

Survey Respondent Title: Assistant City Manager

6TH CYCLE RHNP REQUIRED OBJECTIVES AND FACTORS

Q11 **No**

Are there additional data points that are important to consider in developing the Fresno COG RHNP, particularly those measuring equity or opportunity in the context of furthering of environmental justice and Affirmatively Furthering Fair Housing?

HOUSING OPPORTUNITIES AND CONSTRAINTS

Q12

Which of the following apply to your jurisdiction as either an opportunity or a constraint for development of additional housing by 2030? You can indicate that something is both an opportunity and a constraint, or leave both boxes unchecked if the issue does not have an impact on housing development in your jurisdiction. Check all that apply.

- | | |
|---|--------------------|
| Availability of water suitable for consumption | Opportunity |
| Sewer Capacity | Opportunity |
| Construction costs | Opportunity |
| Availability of construction workforce | Opportunity |
| Availability of vacant land | Opportunity |
| Utility connection fees | Opportunity |
| State requirements to reduce Vehicle Miles Traveled (VMT) | Constraint |

Please explain any opportunities and/or constraints listed above, and/or list any additional opportunities or constraints.

The City of San Joaquin has ample room for growth when it comes to the utility services we provide. There are certain market conditions and preferences that deserve consideration, but are largely unimpactful. The most serious issue facing the City of San Joaquin is oppressive and poorly thought-out policies by the State of California that are meant to favor larger, richer cities.

Q13

The location and type of housing can play a key role in meeting State and regional targets to reduce greenhouse gas (GHG) emissions. What land use policies or strategies has your jurisdiction implemented to minimize GHG emissions?

Check all that apply.

- Investment in transit expansion,
- Investment in maintaining or improving existing public transportation infrastructure,
- Investment in pedestrian, bicycle, and active transportation infrastructure,
- Land use changes that encourage a diversity of housing types and/or mixed-use development,
- Incentives or policies to encourage housing development on vacant or underutilized land near transit,
- Increasing local employment opportunities to reduce commute lengths for residents

Q14

Does your jurisdiction collect data on homelessness within the jurisdiction and demand for transitional housing for those experiencing homelessness?

No

Q15

What are the primary barriers or gaps your jurisdiction faces in meeting its RHNA goals for producing housing affordable to very low- and low-income households?

Check all that apply.

Local affordable housing development capacity

Q16

Over the course of a typical year, is there a need in your jurisdiction for housing for farmworkers?

No

Q17

If your jurisdiction is not currently meeting the demand for farmworker housing, what are the main reasons for this unmet demand?

Respondent skipped this question

QUESTIONS ABOUT FAIR HOUSING ISSUES, GOALS, AND ACTIONS

Q18

Which of the following factors contribute to fair housing issues in your jurisdiction?
Check all that apply.

Location of employers,
Creation and retention of high-quality jobs,
Range of job opportunities available,
CEQA and the land use entitlement process

Q19

What actions has your jurisdiction taken to overcome historical patterns of segregation or remove barriers to equal housing opportunity?
Check all that apply.

Other (please specify):
Not applicable.

Q20

Which of the following policies, programs, or actions does your jurisdiction use to prevent or mitigate the displacement of low-income households?
Check all that apply:

Promoting streamlined processing of ADUs

In Use

Preparer Information

Jurisdiction: City of Sanger

Survey Respondent Name: David Brletic

Survey Respondent Title: Senior Planner

6TH CYCLE RHNP REQUIRED OBJECTIVES AND FACTORS

Q11

No

Are there additional data points that are important to consider in developing the Fresno COG RHNP, particularly those measuring equity or opportunity in the context of furthering of environmental justice and Affirmatively Furthering Fair Housing?

HOUSING OPPORTUNITIES AND CONSTRAINTS

Q12

Which of the following apply to your jurisdiction as either an opportunity or a constraint for development of additional housing by 2030? You can indicate that something is both an opportunity and a constraint, or leave both boxes unchecked if the issue does not have an impact on housing development in your jurisdiction. Check all that apply.

Availability of water suitable for consumption

Constraint

Sewer Capacity

Constraint

Suitable land availability

Opportunity, Constraint

Financing/funding for affordable housing

Opportunity, Constraint

Q13

The location and type of housing can play a key role in meeting State and regional targets to reduce greenhouse gas (GHG) emissions. What land use policies or strategies has your jurisdiction implemented to minimize GHG emissions?

Check all that apply.

Energy efficiency standards in new construction or retrofits,

Investment in pedestrian, bicycle, and active transportation infrastructure,

Land use changes that encourage a diversity of housing types and/or mixed-use development

Q14

No

Does your jurisdiction collect data on homelessness within the jurisdiction and demand for transitional housing for those experiencing homelessness?

Q15

**Local affordable housing development capacity,
Community opposition**

What are the primary barriers or gaps your jurisdiction faces in meeting its RHNA goals for producing housing affordable to very low- and low-income households?

Check all that apply.

Q16

Yes,

Over the course of a typical year, is there a need in your jurisdiction for housing for farmworkers?

If so, what is the total existing need for housing units for farmworkers in your jurisdiction, what portion of this need is currently unmet, what type of housing is lacking, and what is the data source for this information?:
I do not know the total existing need.

Q17

**Local affordable housing development capacity,
Community opposition**

If your jurisdiction is not currently meeting the demand for farmworker housing, what are the main reasons for this unmet demand?

QUESTIONS ABOUT FAIR HOUSING ISSUES, GOALS, AND ACTIONS

Q18

Community opposition to proposed or existing developments,

Which of the following factors contribute to fair housing issues in your jurisdiction?

Displacement of residents due to increased rents or other economic pressures,

Check all that apply.

Deteriorated or abandoned properties

Q19

Land use changes to allow a greater variety of housing types,

What actions has your jurisdiction taken to overcome historical patterns of segregation or remove barriers to equal housing opportunity?

Support for the development of larger affordable housing units that can accommodate families (2- and 3-bedroom units, or larger),

Check all that apply.

Support for the development of affordable housing for special needs populations (seniors, the disabled, those experiencing homelessness, those with mental health and/or substance abuse issues, etc.)

Q20

Respondent skipped this question

Which of the following policies, programs, or actions does your jurisdiction use to prevent or mitigate the displacement of low-income households?

Check all that apply:

Preparer Information

Jurisdiction: City of Kerman

Survey Respondent Name: Mike Dozier

Survey Respondent Title: Economic Development Manager

Jurisdiction Contact Information

Contact: John Jansons, City Manager

Phone #: (559) 846-9384

Email: Jjansons@cityofkerman.org

6TH CYCLE RHNP REQUIRED OBJECTIVES AND FACTORS

Q11 **No**

Are there additional data points that are important to consider in developing the Fresno COG RHNP, particularly those measuring equity or opportunity in the context of furthering of environmental justice and Affirmatively Furthering Fair Housing?

HOUSING OPPORTUNITIES AND CONSTRAINTS

Q12

Which of the following apply to your jurisdiction as either an opportunity or a constraint for development of additional housing by 2030? You can indicate that something is both an opportunity and a constraint, or leave both boxes unchecked if the issue does not have an impact on housing development in your jurisdiction. Check all that apply.

Availability of water suitable for consumption	Opportunity
Sewer Capacity	Opportunity
Suitable land availability	Constraint
Lands protected by federal or State programs	Constraint
County policies to preserve agricultural land	Opportunity
Availability of schools	Opportunity
Availability of parks	Opportunity
Availability of public or social services	Opportunity
Impact of climate change and natural hazards	Opportunity
Construction costs	Constraint
Availability of construction workforce	Opportunity
Availability of surplus public land	Constraint
Availability of vacant land	Constraint

Fresno COG 6th Cycle RHNP Survey

Financing/funding for affordable housing

Constraint

Weak market conditions

Opportunity

Project labor agreements

Constraint

Utility connection fees

Constraint

State requirements to reduce Vehicle Miles Traveled (VMT)

Opportunity

Please explain any opportunities and/or constraints listed above, and/or list any additional opportunities or constraints.

A third option of “not applicable” is recommended

Q13

The location and type of housing can play a key role in meeting State and regional targets to reduce greenhouse gas (GHG) emissions. What land use policies or strategies has your jurisdiction implemented to minimize GHG emissions?

Check all that apply.

Energy efficiency standards in new construction or retrofits,

Investment in pedestrian, bicycle, and active transportation infrastructure,

Land use changes that encourage a diversity of housing types and/or mixed-use development,

Changes to parking requirements for new residential and/or commercial construction,

Increasing local employment opportunities to reduce commute lengths for residents

Q14

Does your jurisdiction collect data on homelessness within the jurisdiction and demand for transitional housing for those experiencing homelessness?

No

Q15

What are the primary barriers or gaps your jurisdiction faces in meeting its RHNA goals for producing housing affordable to very low- and low-income households?

Check all that apply.

Local gap financing for affordable housing development,
Availability of land

Q16

Over the course of a typical year, is there a need in your jurisdiction for housing for farmworkers?

Yes

Q17

If your jurisdiction is not currently meeting the demand for farmworker housing, what are the main reasons for this unmet demand?

Lack of gap financing for affordable housing development,

Local affordable housing development capacity,

Regulatory requirements relating to on-farm housing

QUESTIONS ABOUT FAIR HOUSING ISSUES, GOALS, AND ACTIONS

Q18

Which of the following factors contribute to fair housing issues in your jurisdiction?

Check all that apply.

Location of affordable housing,

The availability of affordable units in a range of sizes (especially larger units),

Lack of community revitalization strategies,

Lack of private investments in low-income neighborhoods and/or communities of color, including services or amenities,

Access to financial services,

Location of employers,

Range of job opportunities available,

CEQA and the land use entitlement process

Q19

What actions has your jurisdiction taken to overcome historical patterns of segregation or remove barriers to equal housing opportunity?

Check all that apply.

Land use changes to allow a greater variety of housing types,

Support for the development of larger affordable housing units that can accommodate families (2- and 3-bedroom units, or larger),

Support for the development of affordable housing for special needs populations (seniors, the disabled, those experiencing homelessness, those with mental health and/or substance abuse issues, etc.),

Exploring partnerships with Community Development Financial Institutions, large regional employers, and investors to add to the financial resources available for the creation and preservation of deed-restricted affordable housing units,

Streamlining entitlements processes and/or removing development fees for affordable housing construction,

Inclusionary zoning or other programs to encourage mixed-income developments,

Ensuring affirmative marketing of affordable housing is targeted to all segments of the community

Q20

Which of the following policies, programs, or actions does your jurisdiction use to prevent or mitigate the displacement of low-income households?

Check all that apply:

Inclusionary zoning

In Use

Promoting streamlined processing of ADUs

Under Council/Board Consideration

Preparer Information

Jurisdiction: City of Mendota

Survey Respondent Name: Jeff O’Neal

Survey Respondent Title: City Planner

6TH CYCLE RHNP REQUIRED OBJECTIVES AND FACTORS

Q11

Are there additional data points that are important to consider in developing the Fresno COG RHNP, particularly those measuring equity or opportunity in the context of furthering of environmental justice and Affirmatively Furthering Fair Housing?

Yes,

If so, please specify.:

Finding developers that are willing to develop what we think they need to develop vs. what the market is dictating.

HOUSING OPPORTUNITIES AND CONSTRAINTS

Q12

Which of the following apply to your jurisdiction as either an opportunity or a constraint for development of additional housing by 2030? You can indicate that something is both an opportunity and a constraint, or leave both boxes unchecked if the issue does not have an impact on housing development in your jurisdiction. Check all that apply.

Availability of water suitable for consumption	Constraint
Sewer Capacity	Constraint
Suitable land availability	Constraint
Availability of schools	Constraint
Availability of parks	Constraint
Availability of public or social services	Constraint
Construction costs	Constraint
Availability of construction workforce	Constraint
Availability of surplus public land	Constraint
Availability of vacant land	Constraint
Financing/funding for affordable housing	Constraint
Weak market conditions	Constraint
State requirements to reduce Vehicle Miles Traveled (VMT)	Constraint

Q13

The location and type of housing can play a key role in meeting State and regional targets to reduce greenhouse gas (GHG) emissions. What land use policies or strategies has your jurisdiction implemented to minimize GHG emissions?

Check all that apply.

Energy efficiency standards in new construction or retrofits,

Land use changes that encourage a diversity of housing types and/or mixed-use development,

Increasing local employment opportunities to reduce commute lengths for residents

Q14

Does your jurisdiction collect data on homelessness within the jurisdiction and demand for transitional housing for those experiencing homelessness?

No

Q15

What are the primary barriers or gaps your jurisdiction faces in meeting its RHNA goals for producing housing affordable to very low- and low-income households?

Check all that apply.

Local affordable housing development capacity,

Availability of land,

Lack of requisite infrastructure, such as sewer and water

Q16

Over the course of a typical year, is there a need in your jurisdiction for housing for farmworkers?

Yes,

If so, what is the total existing need for housing units for farmworkers in your jurisdiction, what portion of this need is currently unmet, what type of housing is lacking, and what is the data source for this information?:

The majority of our residents are farmworkers. There is still a large need for more housing for farmworkers who are resorting to hotels and substandard illegal housing.

Q17

If your jurisdiction is not currently meeting the demand for farmworker housing, what are the main reasons for this unmet demand?

Lack of gap financing for affordable housing development,

Local affordable housing development capacity,

Availability of land,

Community opposition,

Lack of requisite infrastructure, such as sewer and water

QUESTIONS ABOUT FAIR HOUSING ISSUES, GOALS, AND ACTIONS

Q18

Which of the following factors contribute to fair housing issues in your jurisdiction?

Check all that apply.

Community opposition to proposed or existing developments,

Displacement of residents due to increased rents or other economic pressures,

Displacement of low-income residents and/or residents of color,

Displacement of residents due to natural hazards, such as wildfires,

Land use and zoning laws, such as minimum lot sizes, limits on multi-unit properties, height limits, or minimum parking requirements,

Occupancy standards that limit the number of people in a unit,

Location of affordable housing,

The availability of affordable units in a range of sizes (especially larger units),

Foreclosure patterns,

Deteriorated or abandoned properties,

Lack of community revitalization strategies,

Lack of private investments in low-income neighborhoods and/or communities of color, including services or amenities,

Lack of regional cooperation,

Access to financial services,

Lending discrimination,

Location of employers,

Location of environmental health hazards, such as factories or agricultural production,

Availability, frequency, and reliability of public transit,

Access to healthcare facilities and medical services,

Access to grocery stores and healthy food options,

Location of proficient schools and school assignment policies,

Creation and retention of high-quality jobs,
Range of job opportunities available,
The impacts of natural hazards, such as wildfires,
CEQA and the land use entitlement process,
Private discrimination, such as residential real estate
“steering”,
Regulatory requirements for on-farm housing,
Other (please explain):
Water and sewer capacity

Q19

What actions has your jurisdiction taken to overcome historical patterns of segregation or remove barriers to equal housing opportunity?

Check all that apply.

Land use changes to allow a greater variety of housing types,
Support for the development of affordable housing for special needs populations (seniors, the disabled, those experiencing homelessness, those with mental health and/or substance abuse issues, etc.),
Streamlining entitlements processes and/or removing development fees for affordable housing construction

Q20

Which of the following policies, programs, or actions does your jurisdiction use to prevent or mitigate the displacement of low-income households?

Check all that apply:

Respondent skipped this question

APPENDIX 6

HCD Review of Draft RHNA Methodology

**DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
DIVISION OF HOUSING POLICY DEVELOPMENT**

2020 W. El Camino Avenue, Suite 500
Sacramento, CA 95833
(916) 263-2911 / FAX (916) 263-7453
www.hcd.ca.gov



May 13, 2022

Tony Boren, Executive Director
Fresno Council of Governments
2035 Tulare Street, Suite 201
Fresno, CA 93721

Dear Tony Boren:

RE: Review of Draft Regional Housing Need Allocation (RHNA) Methodology

Thank you for submitting the draft Fresno Council of Government's (Fresno COG) Sixth Cycle Regional Housing Need Allocation (RHNA) Methodology. Pursuant to Government Code Section 65584.04(i), the California Department of Housing and Community Development (HCD) is required to review draft RHNA methodologies to determine whether a methodology furthers the statutory objectives described in Government Code Section 65584(d).

The draft RHNA methodology begins with the total regional determination provided by HCD of 58,298 units. The methodology then establishes base allocations according to each jurisdiction's regional share of (1) existing 2021 population and (2) forecasted growth from 2020 to 2050. Both factors are weighted equally.

Next, the methodology uses five weighted factors to adjust the total RHNA for each jurisdiction:

- Percentage of non-vacant housing units (weighted at 35%) – This factor allocates more RHNA to jurisdictions with higher percentages of non-vacant housing relative to their total housing stock according to Department of Finance data.
- TCAC Opportunity Score (weighted at 20%) – This factor allocates more RHNA to jurisdictions with higher average scores across census geographies within each jurisdiction based on TCAC/HCD opportunity data.
- Regional share of 2020 jobs (weighted at 12.5%) – This factor allocates more RHNA to jurisdictions with higher shares of the county's jobs according to California Employment Development Department data.
- Regional share of projected jobs (weighted at 12.5%) – This factor allocates more RHNA to jurisdictions with higher anticipated shares of the county's jobs between 2020 and 2035 based on Fresno COG growth forecasts.
- Percent of developable land (weighted at 20%) – This factor allocates more RHNA to jurisdictions with more land that is not:
 - Protected farmland according to the California Department of Conservation's Farmland Mapping and Monitoring Program or land registered as Williamson Act land by Fresno County

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- Sensitive wildlife habitat or wetland according to the National Wetlands Inventory
- Within state parks, national parks, or national forest
- Critical habitats according to the California Natural Diversity Database
- Areas at high risk of environmental hazards such as flooding (Federal Emergency Management Agency’s National Flood Hazard Layer), wildfire (CAL FIRE’s Fire and Resource Assessment Program designations), erosion (US Department of Agriculture’s Soil Survey Geographic Database), and earthquakes (US Geological Survey’s fault location data and Alquist-Priolo zones)

Lastly, the methodology uses an income-shift approach to distribute the total RHNA for each jurisdiction across the four income tiers. This adjustment multiplies the difference between the percentage of units in each income tier of the Regional Determination provided by HCD and each jurisdiction’s existing share of units in the income tier by 150%. This adjustment results in jurisdictions with a lower proportion of existing lower income households receiving a higher share of lower income RHNA.

HCD has completed its review of the methodology and finds that the draft Fresno COG RHNA Methodology furthers the statutory objectives described in Government Code 65584(d).¹ Fresno COG’s draft methodology directs more RHNA into cities with higher resource levels and housing costs when you control for the unincorporated county, which receives a lower allocation in line with the second objective (promoting infill and protecting agricultural resources). Further, the methodology allocates more lower income RHNA to cities with higher incomes, resources, housing costs, and higher disparities between lower income jobs and affordable units. The draft methodology’s income-shift approach increases the number of lower income units going to higher income areas as a percentage of their total allocation. HCD commends Fresno COG for including factors in the draft methodology linked to the statutory objectives such as a factor based on TCAC/HCD Opportunity Scores.

Below is a summary of findings related to each statutory objective described within Government Code Section 65584(d):

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.

On a per household basis, the methodology allocates more lower income RHNA to cities with more higher income households. Cities with higher housing costs also receive more

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¹ While HCD finds this methodology furthers statutory objectives, applying this methodology to another region or cycle may not necessarily further the statutory objectives as housing conditions and circumstances may differ.

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RHNA on a per household basis when you control for the unincorporated county². Lastly, jurisdictions with higher home ownership rates and higher percentages of single-family homes receive a higher percentage of lower income RHNA relative to their total allocation.

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 draft methodology encourages more efficient development by including regional growth forecasts to determine each jurisdiction’s base allocation, as well as by including two employment factors. Accordingly, jurisdictions with access to more jobs via a 30-minute commute receive more RHNA per household and more total RHNA. Jurisdictions with access to more jobs via a 45-minute transit commute also receive more RHNA per household and more total RHNA. Further, cities with lower annual household VMT, on average, receive more RHNA per household.

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.

On average, the draft methodology allocates the most lower income RHNA relative to household share to jurisdictions with lower income jobs-housing fit ratios over 1.5 (1.5 low-wage jobs for every affordable housing unit). Those jurisdictions also receive more total RHNA. Jurisdictions with lower income jobs-housing fit ratios below 1.5 also receive less total RHNA.

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.

On average, jurisdictions with a larger existing share of lower income households receive smaller allocations of low- and very low-income units as a percentage of the total RHNA. For jurisdictions with higher shares of lower income households, the average lower income allocation is 35 percent of total RHNA. The average lower income allocation for cities with smaller percentages of lower income households is 46 percent.

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² Since allocating less RHNA to the unincorporated county supports objective two, HCD also evaluated whether jurisdictions with higher home values received more RHNA on average when the unincorporated county was excluded. Given that Unincorporated Fresno County has higher than average home values, HCD’s analysis found that the methodology only allocated more RHNA per household to jurisdictions with higher home values when the unincorporated county was removed.

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5. Affirmatively furthering fair housing, which 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.

Cities with more access to opportunity receive larger total RHNA and lower income allocations on a per household basis when controlling for the unincorporated county. Further, cities with more low-resource and high-segregation/poverty areas receive smaller total RHNA and lower income allocations per household when controlling for the unincorporated county. When controlling for the unincorporated county, cities with at least 50 percent low-resource and high-segregation/poverty areas receive a share of the lower income RHNA that is, on average, 84 percent of their share of households, compared to 113 percent for other cities.

HCD appreciates the active role of Fresno COG staff – particularly Meg Prince – in providing data and input throughout the draft Fresno COG RHNA methodology development and review period. HCD also thanks Andrea Howard, David Early, and Allison Giffin for their significant efforts and assistance.

HCD looks forward to continuing our partnership with Fresno COG to help its member jurisdictions meet and exceed the planning and production of the region’s housing need. Support opportunities available for the Fresno COG region this cycle include, but are not limited to:

- Regional Early Action Planning (REAP) 2.0 – \$600 million of state and federal investment to advance implementation of adopted regional plans. REAP 2.0 funding may be used for planning and implementation that accelerates infill housing development and reduces per capita vehicle miles traveled. <https://hcd.ca.gov/grants-funding/active-funding/reap2.shtml>.
- Prohousing Designation Program – Ongoing awards distributed over-the-counter to local jurisdictions with compliant Housing Elements and prohousing policies. Those awarded receive additional points or preference when applying to housing and non-housing funding programs including the Affordable Housing & Sustainable Communities (AHSC), Infill Infrastructure Grant (IIG), and Transformative Climate Communities (TCC).

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- HCD also encourages all Fresno County local governments to consider the many other affordable housing and community development resources available to local governments, including the Permanent Local Housing Allocation program. HCD's programs can be found at <https://www.hcd.ca.gov/grants-funding/nofas.shtml>.

If HCD can provide any additional assistance, or if you, or your staff, have any questions, please contact Annelise Osterberg, Housing Policy Specialist at (916) 776-7540 or annelise.osterberg@hcd.ca.gov.

Sincerely,



Tyrone Buckley
Assistant Deputy Director of Fair Housing

APPENDIX 7

HCD Review of Adopted RHNA Methodology

**DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
DIVISION OF HOUSING POLICY DEVELOPMENT**

2020 W. El Camino Avenue, Suite 500
Sacramento, CA 95833
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www.hod.ca.gov



August 25, 2022

Tony Boren, Executive Director
Fresno Council of Governments
2035 Tulare Street, Suite 201
Fresno, CA 93721

Dear Tony Boren:

**RE: Review of Adopted Final Regional Housing Need Allocation (RHNA)
Methodology**

Thank you for submitting the adopted final Fresno Council of Government's (Fresno COG) Sixth Cycle Regional Housing Need Allocation (RHNA) Methodology. Pursuant to Government Code Section 65584.04(l), the California Department of Housing and Community Development (HCD) may review adopted final RHNA methodologies and report its findings to the council of governments.

On May 13, HCD reviewed Fresno COG's draft RHNA methodology pursuant to Government Code Section 65584.04(i) and found that it furthered the statutory objectives described in Government Code 65584(d). In July, Fresno COG made changes to the draft allocation methodology that lowered the total allocation to unincorporated county and redistributed those units to the incorporated cities. On July 28, the Fresno COG Policy Board passed a resolution to adopt the revised methodology with a cap on the unincorporated county's allocation.

The adopted final RHNA methodology begins with the total regional determination provided by HCD of 58,298 units. The methodology then establishes base allocations according to each jurisdiction's regional share of (1) existing 2021 population and (2) forecasted growth from 2020 to 2050. Both factors are weighted equally.

Next, the methodology uses five weighted factors to adjust the total RHNA for each jurisdiction:

- Percentage of non-vacant housing units (weighted at 35%) – This factor allocates more RHNA to jurisdictions with higher percentages of non-vacant housing relative to their total housing stock according to Department of Finance data.
- TCAC Opportunity Score (weighted at 20%) – This factor allocates more RHNA to jurisdictions with higher average scores across census geographies within each jurisdiction based on TCAC/HCD opportunity data.
- Regional share of 2020 jobs (weighted at 12.5%) – This factor allocates more RHNA to jurisdictions with higher percentages of jobs relative to the county according to California Employment Development Department data.

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- Regional share of projected jobs (weighted at 12.5%) – This factor allocates more RHNA to jurisdictions with higher anticipated shares of the county’s jobs between 2020 and 2035 based on Fresno COG growth forecasts.
- Percent of developable land (weighted at 20%) – This factor allocates more RHNA to jurisdictions with more land that is not:
 - Protected farmland according to the California Department of Conservation’s Farmland Mapping and Monitoring Program or land registered as Williamson Act land by Fresno County
 - Sensitive wildlife habitat or wetland according to the National Wetlands Inventory
 - Within state parks, national parks, or national forest
 - Critical habitats according to the California Natural Diversity Database
 - Areas at high risk of environmental hazards such as flooding (Federal Emergency Management Agency’s National Flood Hazard Layer), wildfire (CAL FIRE’s Fire and Resource Assessment Program designations), erosion (US Department of Agriculture’s Soil Survey Geographic Database), and earthquakes (US Geological Survey’s fault location data and Alquist-Priolo zones)

The final adopted methodology then reduces the total allocation to the unincorporated county to 2,350 units. This is a 1,357-unit reduction from the unincorporated county’s allocation in the previous draft allocation methodology. Those 1,357 units are then distributed to the incorporated cities based on each city’s share of the total regional allocation – excluding the county’s allocation. For example, if the City of Clovis received 16 percent of the region’s RHNA for incorporated cities per Fresno COG’s total RHNA allocation methodology, it would receive 16 percent of the 1,357 units.

Lastly, the methodology uses an “Income-Shift approach” to distribute the total RHNA for each jurisdiction across the four income tiers. This adjustment applies a 150% multiplier to the difference between the percentage of units in the income tier of the Regional Determination provided by HCD and each jurisdiction’s existing share of units in the income tier.

HCD has completed its review of the methodology and finds that the adopted final Fresno COG RHNA Methodology furthers the statutory objectives described in Government Code 65584(d).¹ Fresno COG’s final methodology directs more lower income RHNA into cities with higher incomes, resources, and housing costs, and cities with higher disparities between lower income jobs and affordable units. The final methodology’s income shift also increases the number of lower income units going to higher income areas as a percentage of their total allocation. HCD commends Fresno

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¹ While HCD finds this methodology furthers statutory objectives, applying this methodology to another region or cycle may not necessarily further the statutory objectives as housing conditions and circumstances may differ.

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COG for including factors in the final methodology linked to the statutory objectives such as TCAC/HCD Opportunity Scores.

Below is a summary of findings related to each statutory objective described within Government Code Section 65584(d):

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.

On a per household basis, the final methodology allocates more lower income RHNA to cities with more higher income households. Cities with higher housing costs also receive more RHNA on a per household basis. Lastly, jurisdictions with higher home ownership rates and higher percentages of single-family homes receive a higher percentage of lower income RHNA relative to their total allocation.

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 final methodology encourages more efficient development by including regional growth forecasts to determine each jurisdiction's base allocation, as well as by including two employment factors. Jurisdictions with access to more jobs via a 30-minute commute receive more RHNA per household and more total RHNA. Jurisdictions with access to more jobs via a 45-minute transit commute also receive more total RHNA. Further, jurisdictions with lower annual household VMT, on average, receive more RHNA per household.

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.

On average, the final methodology allocates the most total RHNA to jurisdictions with lower income jobs-housing fit ratios over 1.5 (1.5 low-wage jobs for every affordable housing unit). Those jurisdictions also receive more lower income RHNA relative to household share. Jurisdictions with lower income jobs-housing fit ratios below 1.5 receive smaller lower income RHNA allocations relative to household share.

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.

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On average, jurisdictions with a larger existing share of lower income households receive smaller allocations of low- and very low-income units as a percentage of the total RHNA. For jurisdictions with higher shares of lower income households, the average lower income allocation is 35 percent of total RHNA. The average lower income allocation for cities with smaller percentages of lower income households is 46 percent.

5. Affirmatively furthering fair housing, which 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.

Cities with more access to opportunity receive larger total RHNA and lower income allocations on a per household basis. Further, cities with more low-resource and high-segregation/poverty areas receive smaller total RHNA and lower income allocations per household. More specifically, cities with at least 50 percent low-resource and high-segregation/poverty areas receive a share of the lower income RHNA that is, on average, 86 percent of their share of households, compared to 116 percent for other cities.

HCD appreciates the active role of Fresno COG staff – particularly Meg Prince – in providing data and input throughout the Fresno COG RHNA methodology development and review period. HCD also thanks Andrea Howard, David Early, and Allison Giffin of Placeworks for their significant efforts and assistance.

HCD looks forward to continuing our partnership with Fresno COG to help its member jurisdictions meet and exceed the planning and production of the region’s housing need. Support opportunities available for the Fresno COG region this cycle include, but are not limited to:

- Regional Early Action Planning (REAP) 2.0 – \$600 million of state and federal investment to advance implementation of adopted regional plans. REAP 2.0 funding may be used for planning and implementation that accelerates infill housing development and reduces per capita vehicle miles traveled. <https://hcd.ca.gov/grants-funding/active-funding/reap2.shtml>.
- Prohousing Designation Program – Ongoing awards distributed over-the-counter to local jurisdictions with compliant Housing Elements and prohousing policies. Those awarded receive additional points or

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preference when applying to housing and non-housing funding programs including the Affordable Housing & Sustainable Communities (AHSC), Infill Infrastructure Grant (IIG), and Transformative Climate Communities (TCC).

- HCD also encourages all Fresno County local governments to consider the many other affordable housing and community development resources available to local governments, including the Permanent Local Housing Allocation program. HCD's programs can be found at <https://www.hcd.ca.gov/grants-funding/nofas.shtml>.

If HCD can provide any additional assistance, or if you, or your staff, have any questions, please contact Annelise Osterberg, Housing Policy Specialist at (916) 776-7540 or annelise.osterberg@hcd.ca.gov.

Sincerely,



Tyrone Buckley
Assistant Deputy Director of Fair Housing



 Fresno Council of
Governments

 PLACEWORKS