2023-2031 Regional Housing Needs Allocation – Cycle 6: Draft Methodology Framework Description

Administrative Draft

22 December 2021

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Glossary of Acronyms

ACS	American Community Survey
AFFH	Affirmatively Furthering Fair Housing
AMHI	Area Median Household Income
CHAS	Comprehensive Housing Affordability Strategy
COG	Council of Governments
GIS	Geographic Information System
HCD	California Department of Housing and Community Development
HUD	U.S. Department of Housing and Urban Development
MFAV	Maximum Factor Adjustment Value
RHNA	Regional Housing Needs Assessment
RTP/SCS	Regional Transportation Plan/Sustainable Communities Strategy
TCAC	California Tax Credit Allocation Committee

Introduction

Overview

The Regional Housing Needs Allocation (RHNA) is a state-required process that seeks to ensure cities and counties are planning for enough housing to accommodate all economic segments of the community. The process is split into three steps:

1. Regional Determination: The State Department of Housing and Community Development (HCD) provides each region a Regional Determination of housing need, which includes a total number of units split into four income categories. San Joaquin COG received the Final Regional Determination for Cycle 6 RHNA (2023-2031) in December of 2021.

2. RHNA Methodology: Councils of Governments are responsible for developing a RHNA Methodology for allocating the Regional Determination to each jurisdiction in the region. This methodology must further a series of State objectives.

3. Housing Element Updates: Each jurisdiction must then adopt a housing element that demonstrates, among other things, how the jurisdiction can accommodate its assigned RHNA number through its zoning. The state reviews each jurisdiction's housing element for compliance.

This document describes a Draft Methodology Framework for San Joaquin County's 2023-2031 RHNA Cycle 6. The San Joaquin COG Final Regional Determination for Cycle 6 RHNA (2023-2031) is 52,719 units. That final RHNA Determination was received on December 21, 2021, and includes adjustments for vacancy, replacement, overcrowding, and cost burden as required by state law. In development of this methodology, efforts on other Cycle 6 Methodologies were reviewed and incorporated as their demonstration of best practices warranted. To these ends particular focus was given to the Cycle 6 RHNA Methodology used by the Sacramento Area Council of Governments (SACOG) and that under development by Fresno COG.

Implications of RHNA for Local Governments

California requires that all local governments (cities and counties) adequately plan to meet the housing needs of everyone in the community. The RHNA quantifies the need for housing at all income levels and informs local land use planning in addressing existing and future housing needs resulting from population, employment, and household growth. As such, in addition to the total overall housing need number of 52,719 units, the Final RHNA Determination includes units required to meet housing needs across four income categories which are defined in terms of area median household income (AMHI). These housing needs by income level are reported in Table 1.

Table 1 Final HCD RHNA Determination for San Joaquin COG

Income Category	Income Limits	Percent	Housing Unit Need	Broad Income Category	Income Limits	Percent	Housing Unit Need
Very Low	<50% AMHI	25.2%	13,293	Lower Income	<80% AMHI	41.0%	21,637
Low	50%-80% AMHI	15.8%	8,344				
Moderate	80%-120% AMHI	17.5%	9,231	Higher Income	>80% AMHI	59.0%	31,082
Above Moderate	>120% AMHI	41.4%	21,851				
Total		**100.0%**	**52,719**			**100.0%**	**52,719**
Note: Due to rounding, numbers presented in this table may not add up precisely to the totals provided.							

San Joaquin COG, with input from elected officials, local staff, and stakeholders, must develop a methodology that quantifies and distributes the number of housing units assigned to each local government to meet the total regional housing need. The allocation must meet statutory objectives identified in California Housing Element Law (Government Code §§ 65580-65589.11) and be consistent with the forecasted development pattern from the Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS) (e.g., see Government Code § 65584.04(m)). The RHNA methodology allows for some discretion; however, state law, such as in Government Code § 65584(d) and Government Code §65584.04(e), requires San Joaquin COG to further a series of objectives and to consider and include several additional factors to the extent that sufficient data is available and so long as either the factor is specifically listed in 65584.04(e) or 1) San Joaquin COG specifies which objective(s) from 65584(d) each additional factor is necessary to further or 2) none of the factors undermine the objectives in 65584(d), the factors are applied equally across all income levels, and San Joaquin COG makes a finding that any factors not already listed in 65584.04(e) are necessary to address significant health and safety conditions. This Draft Methodology Framework Report develops that RHNA methodology, presenting a methodology for RHNA Cycle 6 that addresses the statutory objectives while considering the other factors as well.

Following the development and adoption of the RHNA methodology, the Regional Housing Needs Allocation Plan (RHNA Plan) formalizes the RHNA process into a planning document, establishing the total number of housing units that each city and the county must plan for within the eight-year planning period. California Housing Element Law requires local governments to adopt plans and regulatory systems that provide opportunities for, and do not unduly constrain, housing development. Following the adoption of the RHNA Plan, each local jurisdiction must then update the housing element of its general plan to demonstrate how zoning will accommodate its share of RHNA (e.g., see Government Code § 65583(a)(3)).

If a jurisdiction does not take actions consistent with its adopted housing element, HCD may revoke housing element compliance (e.g., see Government Code § 65585(i)(1)(B)). If noncompliance is determined a range of penalties and consequences are possible. These include finding, because of its noncompliant housing element, that the jurisdiction's General Plan is inadequate and is therefore invalid, in which case the jurisdiction can no longer make permitting decisions. Jurisdictions with noncompliant housing elements are also vulnerable to litigation from housing rights' organizations, developers, and HCD, which may lead to mandatory compliance orders, suspension of local building control, and court approval of housing developments.

RHNA Objectives

State statute requires San Joaquin COG to demonstrate how its methodology "furthers" the five RHNA objectives shown below. This not only requires consistency, but proactive inclusion of each objective into the methodology. Each objective, as described in Government Code § 65584(d), are described below.[1]

OBJECTIVE 1. INCREASE HOUSING SUPPLY AND MIX OF HOUSING TYPES

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.

OBJECTIVE 2. PROMOTE INFILL, EQUITY, AND ENVIRONMENT

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.

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[1] Descriptions are taken from:
https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?sectionNum=65584.&lawCode=GOV on 8/31/2021.

OBJECTIVE 3. ENSURE JOBS HOUSING BALANCE AND FIT

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.

OBJECTIVE 4. PROMOTE REGIONAL INCOME PARITY

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.

OBJECTIVE 5. AFFIRMATIVELY FURTHER FAIR HOUSING

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.

In addition to furthering the five RHNA objectives, California Government Code § 65584.04(d) requires that each Council of Government must survey its member jurisdictions for information to inform development of the RHNA Methodology and Plan. Therefore, a jurisdictional survey containing a series of questions related to these Objectives, the additional Factors required for consideration (see Appendix A for a summary of these factors), and efforts to Affirmatively Further Fair Housing (AFFH) has been developed and circulated to member jurisdictions. While results of the jurisdictional survey are not currently available for this draft of the RHNA Methodology, they will be incorporated in the future.

Base RHNA Calculation

The first step in the RHNA methodology is to determine each jurisdiction's total RHNA allocation before it is divided by income categories. The Draft RHNA Methodology determines each jurisdiction's total base RHNA number by multiplying the total HCD RHNA Determination by the proportion of household growth attributed to a jurisdiction in the forecast for the RTP/SCS between 2023 and 2031.

Table 2 RTP/SCS Forecast Households in 2031 by Jurisdiction

	A	B	C
Jurisdiction	Household Growth (2023-2031)	Share of Growth	Base RHNA Allocation
Escalon	160	0.7%	367
Lathrop	3,654	15.9%	8,402
Lodi	1,700	7.4%	3,909
Manteca	3,612	15.8%	8,306
Ripon	619	2.7%	1,423
Stockton	5,512	24.0%	12,673
Tracy	3,841	16.7%	8,830
Unincorporated	3,831	16.7%	8,808
Total San Joaquin County	22,930	100%	52,719
Note: Due to rounding, numbers presented in this table may not add up precisely to the totals provided.			

Table 2 reports the results of this process for San Joaquin County. In Column A each jurisdiction's household growth during San Joaquin County's 6th RHNA Cycle (2023-2031) is reported based on the RTP/SCS forecast.[2] The associated jurisdictional shares (Column B) are then multiplied by the County's total housing unit need, 52,719, to get the base total RHNA determination by jurisdiction in Column C.

Table 3 Initial RHNA Allocation by Jurisdiction and Calibration to Final HCD RHNA Determination

	A	B	C	D
Jurisdiction	Total Base RHNA	Lower HH (%)	Lower RHNA	Higher RHNA
Escalon	367	41.0%	151	217
Lathrop	8,402	41.0%	3,448	4,954
Lodi	3,909	41.0%	1,604	2,305
Manteca	8,306	41.0%	3,409	4,897
Ripon	1,423	41.0%	584	839
Stockton	12,673	41.0%	5,201	7,472
Tracy	8,830	41.0%	3,624	5,206
Unincorporated	8,808	41.0%	3,615	5,193
San Joaquin County	**52,719**	41.0%	**21,637**	**31,082**

Note: Due to rounding, numbers presented in this table may not add up precisely to the totals provided.

The second step determines jurisdictional allocations by income category according to those specified in the Final RHNA Determination. Table 3 details the process for San Joaquin County. The jurisdictions' Base RHNA Allocation from the previous table is carried forward (Column A) and those values are multiplied by the share of lower income housing units in the Final RHNA determination (Column B) to get each jurisdictions' base lower income RHNA determination (Column C). The number of higher income housing units (Column D) is then estimated by subtracting the Lower Income allocation (Column C) from the Total Base RHNA (Column A).

Table 4 RHNA Determination by Jurisdiction Aligned to Broad Income Category Totals

Jurisdiction	Lower Income (0-80%)	Higher Income (80+%)	*Base RHNA Allocation*
Escalon	151	217	367
Lathrop	3,448	4,954	8,402
Lodi	1,604	2,305	3,909
Manteca	3,409	4,897	8,306
Ripon	584	839	1,423
Stockton	5,201	7,472	12,673
Tracy	3,624	5,206	8,830
Unincorporated	3,615	5,193	8,808
San Joaquin County	**21,637**	**31,082**	**52,719**

Note: Due to rounding, numbers presented in this table may not add up precisely to the totals provided.

Table 4 presents a summary of the draft jurisdictional allocations aligned to the RHNA Housing Unit Determination by broad income level.

Using the RTP/SCS forecast as the basis for total RHNA calculations ensures consistency between these two planning efforts. Since the RTP/SCS forecast is built from local plans, it incorporates a variety of regulatory, market, and performance factors. The RTP/SCS growth forecast has also been thoroughly vetted by local planning staff and represents a County-wide agreement on growth and its path to attaining climate and quality

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[2] This report uses the San County RTP/SCS Forecast dated 9/10/2021 for these estimates. It is available here:
https://www.sjcog.org/DocumentCenter/View/6007/Demographic-and-Employment-Forecast-2020

of life goals. While the RTP/SCS forecast of household growth during the 6th RHNA cycle from 2023-2031 has been used in this Draft RHNA Methodology, the RTP/SCS also generates county-wide and jurisdictional forecasts of population growth. A range of elements in RTP/SCS forecast could also potentially be employed as the basis for the total RHNA calculations. These include using the jurisdictional shares of population/household growth rates through the RTP/SCS forecast period of 2050 or using the composition of population/households in 2031. An overview of some of these additional RTP/SCS base allocations by jurisdiction on the distribution of the RHNA Determination are presented in Table 13 in Appendix B.

Lower Income Housing Units Adjustment Factors

The framework for the RHNA methodology is oriented around furthering each of the statutory RHNA objectives. In Table 5, the five RHNA objectives are listed by row and the adjustment factors used to further those objectives are listed by column. As described above, the first two objectives are furthered through the total RHNA calculation relying on the development pattern in the RTP/SCS (step one). Those objectives are also intrinsically addressed though the assignment of housing units at different income categories to each jurisdiction across the county (step two). The three other objectives are not inherently furthered by the RTP/SCS. Therefore, additional adjustment factors are needed. This section describes those factors.

Table 5 RHNA Objectives and Allocation Adjustment Factors

RHNA Objectives (rows)/ RHNA Adjustment Factors (columns)	Baseline RTP/SCS Forecast	Affirmatively Furthering Fair Housing Factor	Income Parity Factor	Jobs-Housing Fit Factor
Increasing the housing supply and mix of housing types, tenure, and affordability	Furthers	Supports	Supports	Supports
Promoting infill development and socioeconomic equity, protecting environmental and agricultural resources, and encouraging efficient development patterns	Furthers	Supports		Supports
Promoting an improved intraregional relationship between jobs and housing	Supports			Furthers
Balancing disproportionate household income distributions		Supports	Furthers	
Affirmatively furthering fair housing		Furthers	Supports	

Adjustment Factor One: Jobs-Housing Fit Factor

This factor addresses the objective to improve the intraregional relationship between jobs and housing, including explicit consideration of the balance between the number of low-wage jobs and the number of units affordable to low-wage jobs in the jurisdiction. While the RTP/SCS addresses the overall jobs-housing balance, it does not separate the lower income work-housing balance issue. Therefore, this factor considers the existing ratio of low-wage workers to units affordable to low-wage workers. Jurisdictions with a higher-than-average ratio receive an upward adjustment of lower income RHNA units and those with a lower-than-average ratio receive a downward adjustment of lower income RHNA units.

Table 6 reports the jobs-housing fit adjustment factors by jurisdiction for San Joaquin County. It uses the number of jobs by jurisdiction that pay $3,333 per month or less as the measure of low-wage jobs.[3] Given that HCD considers households who spend more than 30% of their income on housing to be cost burdened, data on units for rent at less than $1,000 a month (30% of $3,333 income) are used to estimate the number of affordable housing units by jurisdiction.[4] The percentage difference between the overall county ratio of 3.01 and the jurisdictions' ratios is then used to proportionally adjust the jurisdictions' allocated affordable housing units. Through this process jurisdictions with higher ratios of low-wage workers to affordable housing units are encouraged to zone for more affordable housing.

Table 6 Jobs-Housing Fit Factor Jurisdictional Variance

Jurisdiction	Affordable Housing Units	Low-Wage Jobs	Jobs-Housing Fit Ratio	Adjustment from County Ratio [3.01]
Escalon	233	1,154	5.0	64.6%
Lathrop	246	4,366	17.7	489.8%
Lodi	5,696	14,095	2.5	-17.8%
Manteca	3,135	11,521	3.7	22.1%
Ripon	529	2,443	4.6	53.5%
Stockton	28,532	60,982	2.1	-29.0%
Tracy	1,736	23,578	13.6	351.3%
Unincorporated	8,110	26,954	3.3	10.4%
Note: Due to rounding, numbers presented in this table may not add up precisely to the totals provided.				

Adjustment Factor Two: Regional Income Parity Factor

This factor addresses the objective to balance disproportionate household income distributions. Using the existing share of lower-income households, jurisdictions with a lower-than-average share receive an upward adjustment of lower income RHNA units and those with a higher-than-average share receive a downward adjustment of lower income RHNA units.

Table 7 Regional Income Parity Factor Jurisdictional Variance

Jurisdiction	Lower Income Households	Total Households	Lower Income Share	Adjustment from County Share [39.1%]
Escalon	880	2,600	33.8%	5.2%
Lathrop	1,540	5,485	28.1%	11.0%
Lodi	9,145	22,530	40.6%	-1.5%
Manteca	7,845	23,495	33.4%	5.7%
Ripon	1,190	5,085	23.4%	15.7%
Stockton	43,805	93,745	46.7%	-7.7%
Tracy	5,950	25,470	23.4%	15.7%
Unincorporated	17,100	45,400	37.7%	1.4%
Note: Due to rounding, numbers presented in this table may not add up precisely to the totals provided.				

Table 7 reports the regional income parity adjustment factors by jurisdiction for San Joaquin County. It uses the number of households with income 80% or less than the area median income divided by total number of households

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[3] In this report, 2018 jobs by jurisdiction data are used from the U.S. Census Bureau's Longitudinal Employer-Household Dynamics (LEHD) program.
[4] In this report, Contract Rent reported by jurisdiction in the U.S. Census Bureau's American Community Survey Table# B25056, 2019 5-Year Estimates is used to estimate affordable housing units.

in the area to estimate the lower income share.[5] The percentage difference between the overall county share of 39.1% lower income households and the jurisdictions' shares are then used to proportionally adjust the jurisdictions' allocated affordable housing units. By allocating more affordable housing unit zoning to jurisdictions with lower shares of lower-income households and vice versa, over time this factor intends to move jurisdictions towards a similar proportion of lower-income households across the County.

Adjustment Factor Three: Affirmatively Furthering Fair Housing Factor

This factor addresses the objective to take meaningful actions to address disparities in housing needs and in access to opportunity, such as employment, higher performing schools, health care, and transportation. Using the share of existing homes in higher opportunity areas, this factor seeks to open high opportunity jurisdictions to all economic segments of the community by giving jurisdictions with a higher-than-average share of high opportunity housing units an upward adjustment of lower income RHNA units and those with a lower-than-average share a downward adjustment of lower income RHNA units.

Table 8 Affirmatively Furthering Fair Housing Factor Jurisdictional Variance

Jurisdiction	Housing Units in High/Highest Resource Areas	Total Housing Units	Higher Opportunity Share	Adjustment from County Share [44.6%]
Escalon	0	2,694	0.0%	-44.6%
Lathrop	695	5,883	11.8%	-32.8%
Lodi	20,639	24,383	84.6%	40.0%
Manteca	20,083	26,152	76.8%	32.2%
Ripon	0	5,645	0.0%	-44.6%
Stockton	41,473	102,795	40.3%	-4.3%
Tracy	21,465	26,695	80.4%	35.8%
Unincorporated	4,173	49,013	8.5%	-36.1%
Note: Due to rounding, numbers presented in this table may not add up precisely to the totals provided.				

Table 8 reports the AFFH adjustment factors by jurisdiction for San Joaquin County. It uses the number of housing units a jurisdiction has that are in higher opportunity areas divided by total number of housing units in that jurisdiction to estimate the share of higher opportunity areas.[6] The percentage difference between the overall county share of 44.6% higher opportunity units and the jurisdictions' shares are then used to proportionally adjust the jurisdictions' allocated affordable housing units. Through this process jurisdictions with larger shares of higher opportunity housing units are asked to zone for more affordable housing. In so doing, this factor intends to open high opportunity jurisdictions to all economic segments.

Application of the Adjustment Factors

The third step applies the three adjustment factors to each jurisdictions' lower income units according to their respective factor weights and then uses the sum of those factors to increase or decrease the jurisdictions' total lower income units. Some jurisdictions have exceptionally high factor rates in comparison to the county.   For instance, the job-housing fit factor reported in Table 6 for the City of Tracy has a ratio of 13.6 low wage jobs per affordable housing

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[5] In this report, 2013-2017 Comprehensive Housing Affordability Strategy (CHAS) data produced by the U.S. Department of Housing and Urban Development (HUD) is used to estimate the number of area households by income level.
[6] In this report the census tracts identified as high and highest resource in the 2021 Statewide Summary Table of the TCAC/HCD Opportunity Area Maps are used to identify the higher opportunity areas by jurisdiction. The associated housing units in those census tracts are then estimated from the U.S. Census Bureau's American Community Survey Table# DP04, 2019 5-Year data.

unit. That value is 351% higher than county-wide, implying that the City of Tracy's Job-Housing Fit allocation should be increased by 351% unless some maximum factor adjustment limits are imposed. Without limits on the adjustment factors, outliers like the City of Tracy's Job-Housing Fit ratio create an increase in the overall number of lower income housing unit allocations. Given the impact from exceptional, or outlier, values on a particular jurisdiction as well as the distortionary county-wide impact on allocations across income categories, the Draft Methodology has incorporated a Maximum Factor Adjustment Value (MFAV) that sets an upper and lower limit on divergence across the adjustment factors. In determining the MFAV, the distortions of the unbound divergence must be weighed against similar distortions introduced by excessively restrictive values. Therefore, this methodology proposes using a MFAV of 100% which limits any factor adjustment to a doubling of the jurisdiction's increase or decrease in lower income housing unit allocation.

Table 9 Jurisdictions' Lower Income Factor Adjustment Allocations

	A	B	C	D	E	F	G	H	I	J	K
Jurisdiction	Lower Income RHNA	J-H Fit Factor Weight = 33%	J-H Fit Factor % Adj	J-H Fit Factor	Income Parity Weight = 33%	Income Parity Factor % Adj	Income Parity Factor	AFFH Factor Weight = 33%	AFFH Factor % Adj	AFFH Factor	Factor Adj Lower Income
Escalon	151	50	65%	83	50	5%	53	50	-45%	28	163
Lathrop	3,448	1,149	100%	2,299	1,149	11%	1,276	1,149	-33%	772	4,347
Lodi	1,604	535	-18%	440	535	-2%	527	535	40%	749	1,715
Manteca	3,409	1,136	22%	1,388	1,136	6%	1,201	1,136	32%	1,502	4,090
Ripon	584	195	53%	299	195	16%	225	195	-45%	108	632
Stockton	5,201	1,734	-29%	1,231	1,734	-8%	1,601	1,734	-4%	1,660	4,492
Tracy	3,624	1,208	100%	2,416	1,208	16%	1,398	1,208	36%	1,640	5,455
Unincorporated	3,615	1,205	10%	1,331	1,205	1%	1,222	1,205	-36%	770	3,323
County Total	21,637	7,212		9,486	7,212		7,503	7,212		7,229	24,218
Note: Due to rounding, numbers presented in this table may not add up precisely to the totals provided *= MFAV of 100% applied											

Table 9 details the factor adjustment process for San Joaquin County. First, each factor's weight is multiplied by the lower income housing unit allocation (Column A). Doing this results in unadjusted factor weighted lower income housing units for each factor (Columns B, E, and H). Next, each factor adjustment is applied. The percentage adjustment from the first factor, the Jobs-Housing Fit Factor, from Table 6 is reported in Column C. The value in Column C is multiplied by the unadjusted factor weighted shares from Column B and then added to Column B to get the factor adjusted jobs-housing fit unit allocation in Column D. The Income Parity Factor is second, its adjustment values from Table 7 are reported in Column F and multiplied by the unadjusted factor weighted shares from Column E and then added to Column E to get the factor adjusted income parity unit allocation in Column G. Similarly, the adjustment values for the Affirmatively Furthering Fair Housing (AFFH) Factor from Table 8 are reported in Column I and multiplied by the unadjusted factor weighted shares from Column H and then added to Column H to get the factor adjusted AFFH unit allocation in Column J. The sum of Column D, G, and J then form a factor adjusted lower income housing unit allocation by jurisdiction in Column K. It should be noted that since the MFAV is 100%, only two values in Table 9 are affected, the Jobs-Housing Fit adjustment factors for the City of Tracy and that for City of Lathrop.

Factor Adjusted RHNA Determination

The fourth, and final, step re-aligns the jurisdictional factor adjusted housing unit allocations to those specified in the Final RHNA Determination. If San Joaquin County is to maintain the county-wide RHNA Determination across each of the income categories, it is necessary to correct the factor adjusted housing units by income category. Therefore, the percentage differences in the totals across the income levels are applied to each of the jurisdictional factor adjusted housing unit allocations to align the sum of the jurisdictional allocations to the Final Determination values.

Table 10 Factor Adjusted Allocations Calibrated to Final HCD RHNA Determination

	A	B	C	D	E
Jurisdiction	Factor Adj. Lower Income RHNA	Lower Income RHNA % Adjustment	Calibrated Factor Adjusted Lower Income RHNA	Base Total RHNA Allocation	Calibrated Factor Adjusted Higher Income RHNA
Escalon	163	-10.7%	146	367	221
Lathrop	4,347	-10.7%	3,884	8,402	4,518
Lodi	1,715	-10.7%	1,533	3,909	2,377
Manteca	4,090	-10.7%	3,654	8,306	4,651
Ripon	632	-10.7%	565	1,423	859
Stockton	4,492	-10.7%	4,014	12,673	8,660
Tracy	5,455	-10.7%	4,873	8,830	3,957
Unincorporated	3,323	-10.7%	2,969	8,808	5,839
San Joaquin County	24,218	-10.7%	**21,637**	**52,719**	**31,082**
Note: Due to rounding, numbers presented in this table may not add up precisely to the totals provided.					

Table 10 details this adjustment process. In Column A, the jurisdictions' factor adjusted lower income housing unit allocation from Column K of Table 9 are carried forward. Since the sum of lower income RHNA housing units in Column A, 24,218, is higher than the 21,637 in the Final HCD RHNA Determination for lower income housing units, it is necessary to adjust downward the allocations in Column A. Therefore, the percentage difference of -10.7% at the County level (Column B) is applied to each jurisdiction's factor adjusted lower income housing unit allocation (Column A) to get the factor adjusted lower income housing unit allocation by jurisdiction calibrated to the Final HCD RHNA Determination for San Joaquin County in Column C. Given these adjustments, it is necessary to make complementary adjustments to the jurisdiction's higher income housing unit allocations. Those adjustments are made by subtracting the calibrated factor adjusted lower income housing units (Column C) from the base total RHNA allocation (Column D), which results in calibrated factor adjusted higher income housing units in Column E.

Table 11 Factor Adjusted RHNA Housing Unit Determination

	Factor Adjusted Lower Income (0-80%)	Factor Adjusted Higher Income (80+%)	*Base RHNA Allocation*
Escalon	146	221	367
Lathrop	3,884	4,518	8,402
Lodi	1,533	2,377	3,909
Manteca	3,654	4,651	8,306
Ripon	565	859	1,423
Stockton	4,014	8,660	12,673
Tracy	4,873	3,957	8,830
Unincorporated	2,969	5,839	8,808
San Joaquin County	**21,637**	**31,082**	**52,719**
Note: Due to rounding, numbers presented in this table may not add up precisely to the totals provided.			

Table 11 reorganizes the data in Table 10 to summarize the Factor Adjusted RHNA Housing Unit Determination by income level. Differences between the existing share of households by income and shares of factor adjusted RHNA unit allocations are reported in Table 12. It highlights the influence the Draft RHNA Methodology has in promoting transformative housing opportunities in San Joaquin County.

Table 12 Comparison of Housing Unit Structure from Factor Adjustments

Jurisdiction	Lower Income (0-80%)			Higher Income (80+%)		
	Existing	Factor Adjusted	Difference	Existing	Factor Adjusted	Difference
Escalon	34%	40%	6%	66%	60%	-6%
Lathrop	28%	46%	18%	72%	54%	-18%
Lodi	41%	39%	-1%	59%	61%	1%
Manteca	33%	44%	11%	67%	56%	-11%
Ripon	23%	40%	16%	77%	60%	-16%
Stockton	47%	32%	-15%	53%	68%	15%
Tracy	23%	55%	32%	77%	45%	-32%
Unincorporated	38%	34%	-4%	62%	66%	4%
San Joaquin County	39%	41%	■	61%	59%	■
Note: Due to rounding, numbers presented in this table may not add up precisely to the totals provided.						

Appendix A: Additional RHNA Factors for Consideration

These additional factors, as detailed in Government Code § 65584.04(e), are described below.[7]

FACTOR 1. JOBS HOUSING RELATIONSHIP

This factor requires review of each jurisdiction's existing and projected jobs and housing relationship. This includes 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. Where estimates are available projected jurisdictional job growth and projected household growth by income level during the planning period should also be considered.

FACTOR 2. OPPORTUNITIES AND CONSTRAINTS TO DEVELOPMENT OF HOUSING

The following jurisdictional specific issues may be considered:

- 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.
- 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. Consideration must include potential for increased residential development under alternative zoning ordinances and land use restrictions. However, 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.
- 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.
- County policies to preserve prime agricultural land within an unincorporated area and land within an unincorporated area zoned or designated for agricultural protection or preservation. As long as it was approved by the voters of that jurisdiction and prohibits or restricts conversion to nonagricultural uses.

FACTOR 3. HOUSEHOLD GROWTH AND TRANSPORTATION INFRASTRUCTURE

Jurisdictions' distribution of household growth during the RTP/SCS planning cycle may be considered along with opportunities to maximize the use of public transportation and existing transportation infrastructure.

FACTOR 4. INFILL DEVELOPMENT AGREEMENTS

Allows for consideration of agreements, approved by local voters, between a county and its cities that direct growth toward incorporated areas and prohibits or restricts land for agricultural protection or preservation from conversion to nonagricultural uses.

FACTOR 5. ASSISTED HOUSING DEVELOPMENTS

Considers a jurisdictions' loss of units contained in assisted housing developments as a result of mortgage prepayment, subsidy contract expirations, or termination of use restrictions.

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[7] Descriptions are taken from:
https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=GOV&sectionNum=65584.04. on 9/7/2021.

FACTOR 6. COST BURDENED RENTALS

Jurisdictions' share of cost burdened households may be considered under this factor. These households are defined as cost burdened, those paying 30 to 50 percent of their income in rent and severely cost burdened, those paying more than 50 percent of their income in rent.

FACTOR 7. OVERCROWDING

This factor reflects on the jurisdictions' rate of overcrowding. The overcrowding rate is the percent of housing units with more than one resident per room in each room of a dwelling.

FACTOR 8. FARMWORKERS

This factor considers the housing needs of farmworkers.

FACTOR 9. HIGHER EDUCATION INSTITUTIONS

This factor considers the housing needs generated by the presence of an institution of higher education in a jurisdiction.

FACTOR 10. HOMELESS INDIVIDUALS AND FAMILIES

This factor considers the housing needs of individuals and families experiencing homelessness.

FACTOR 11. EMERGENCY HOUSING NEEDS

This factor considers jurisdictions' housing needs resulting from units lost during a state of emergency that occurred in the preceding planning period and that have yet to be rebuilt or replaced.

FACTOR 12. GREENHOUSE GAS EMMISSION TARGETS

This factor considers the region's greenhouse gas emissions targets in its allocation of housing units.

FACTOR 13. OTHER COUNCIL OF GOVERNMENT OBJECTIVES

Considers other factors adopted by the council of governments, which further the RHNA objectives described above and specified in Government Code § 65584(d). The council of governments may include additional factors unrelated to furthering the RHNA objectives as long as: 1) the additional factors do not undermine the RHNA objectives, 2) they are applied equally across all household income levels, and 3) they are necessary to address significant health and safety conditions.

Appendix B: Alternative Base Jurisdictional Allocations

Table 13 Alternative Base Jurisdictional Allocations from RTP/SCS Forecast

Jurisdiction	Base Allocation 1: RTP/SCS Population Growth to RHNA (2023-31)	Base Allocation 2: RTP/SCS Population in 2031	Base Allocation 3: RTP/SCS Population Growth (2022-50)	Base Allocation 4: RTP/SCS Household Growth to RHNA (2023-31)	Base Allocation 5: RTP/SCS Households in 2031	Base Allocation 6: RTP/SCS Household Growth (2022-50)
Escalon	324	503	239	367	563	338
Lathrop	8,113	2,517	10,279	8,402	2,312	9,010
Lodi	3,451	4,495	2,952	3,909	5,046	3,736
Manteca	8,136	6,038	9,642	8,306	6,023	8,972
Ripon	1,333	1,152	1,419	1,423	1,226	1,453
Stockton	13,712	20,722	10,367	12,673	20,301	11,511
Tracy	9,055	6,807	9,875	8,830	6,385	9,044
Unincorporated	8,595	10,484	7,946	8,808	10,864	8,654
Total	52,719					
Note: Due to rounding, numbers presented in this table may not add up precisely to the totals provided.						