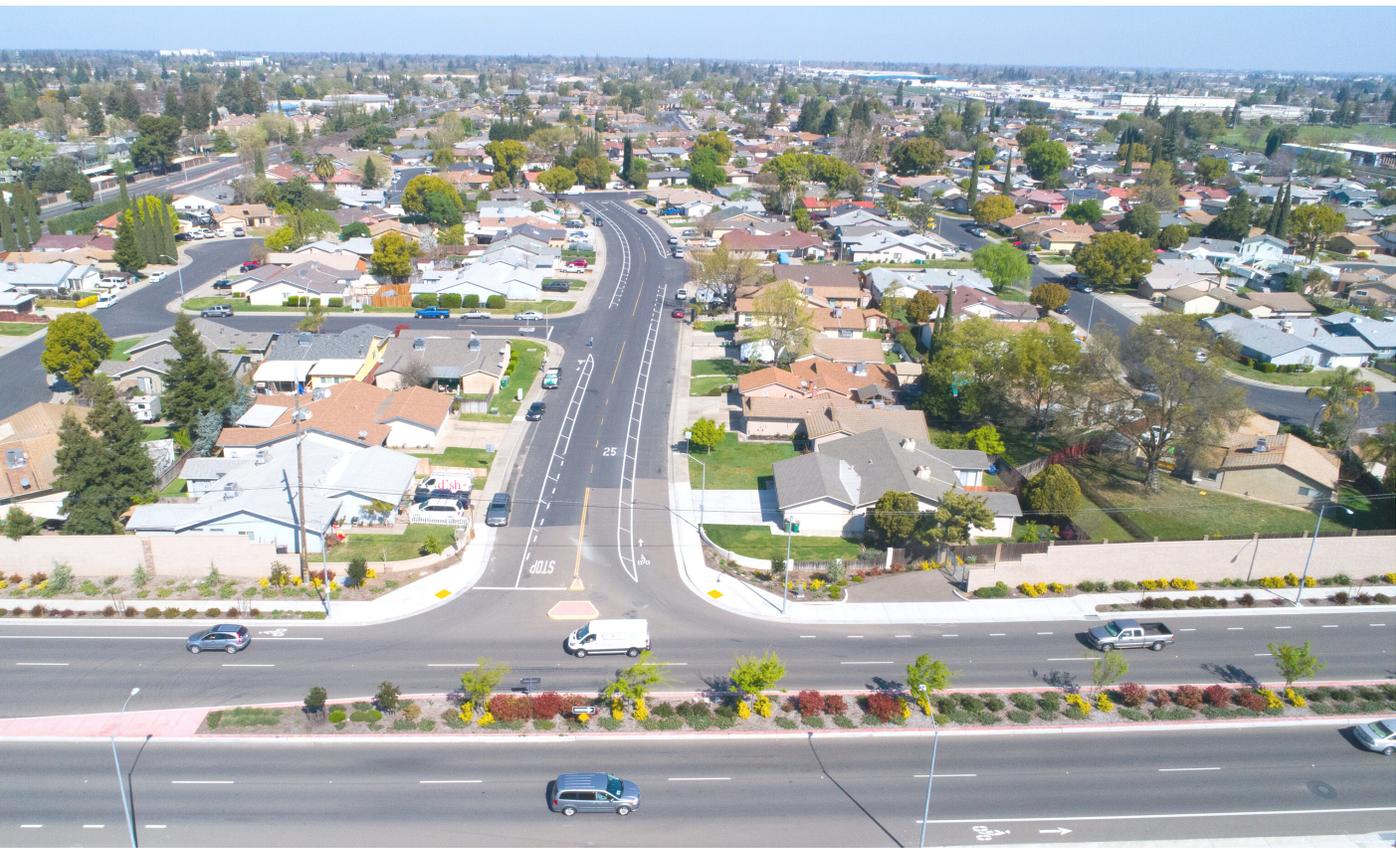
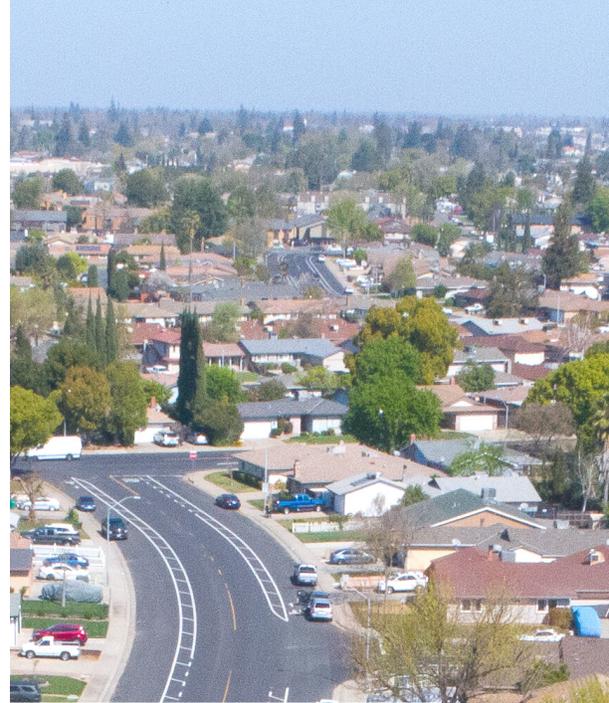


APPENDIX Y

Regional Housing Needs Allocation





REGIONAL HOUSING NEEDS PLAN (RHNP)

6th Cycle Regional Housing Needs Allocation
2023-2031

SAN JOAQUIN COUNTY RHNP

Adopted September XX, 2022

San Joaquin Council of Governments
555 East Weber Avenue Stockton, CA 95202
Phone: (209) 235-0600. Fax: (209) 235-0438
Website: <https://www.sjcog.org/>



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Acronyms

AB	Assembly Bill
ACS	American Community Survey
AFFH	Affirmatively Furthering Fair Housing
AMHI	Area Median Household Income
CARB	California Air Resources Board
CBPR	Center for Business and Policy Research
CDFI	Community Development Financial Institutions
CEQA	California Environmental Quality Act
COG	Council of Governments
DOF	California Department of Finance
FEMA	Federal Emergency Management Agency
GHG	Greenhouse Gas
HCD	California Department of Housing and Community Development
LEHD	Longitudinal Employer-Household Dynamics
MFAV	Maximum Factor Adjustment Value
MPO	Metropolitan Planning Organization
RHNA	Regional Housing Needs Allocation
RHND	Regional Housing Needs Determination
RHNP	Regional Housing Needs Plan
RTP	Regional Transportation Plan
RTP/SCS	Envision 2050: The 2022 Regional Transportation Plan/Sustainable Communities Strategy
SB	Senate Bill
SCS	Sustainable Communities Strategy
SJCOG	San Joaquin Council of Governments



RESOLUTION SAN JOAQUIN COUNCIL OF GOVERNMENTS

R-22-XX

RESOLUTION ADOPTING THE FINAL REGIONAL HOUSING NEEDS PLAN FOR THE SIXTH CYCLE (2023-2031) OF THE REGIONAL HOUSING NEEDS ALLOCATION FOR THE SAN JOAQUIN COUNTY REGION

WHEREAS, the San Joaquin Council of Governments (SJCLOG) is a joint-powers authority formed pursuant to California Government Code § 6500, *et seq.* and the federally designated Metropolitan Planning Organization (MPO) pursuant to 23 U.S.C. § 134(d) for the County of San Joaquin and the cities of Stockton, Lodi, Manteca, Tracy, Ripon, Escalon, and Lathrop; and,

WHEREAS, pursuant to the Housing Element Law (“Act”) of California Government Code § 65580, *et seq.*, each Council of Governments (COG) and the California Department of Housing and Community Development (HCD) are required to determine the existing and projected housing needs in the COG’s region; and,

WHEREAS, under the Act, SJCLOG determines each local jurisdiction’s share of the regional housing need, as determined by HCD, through the Regional Housing Needs Allocation (RHNA) process; and,

WHEREAS, on December 21, 2021, HCD provided SJCLOG with the countywide housing need target number of 52,719 units distributed by the four income categories based on the regional percentages of very-low (25.2%), low (15.8%), moderate (17.5%) and above-moderate (41.4%) median family housing income thresholds derived from the 2020 Census, American Community Survey; and,

WHEREAS, SJCLOG is required by state law to allocate the countywide RHNA targets by jurisdiction and by individualized family income category; and,

WHEREAS, in the development of a RHNA methodology, SJCLOG considered best practices in sixth (6th) Cycle Methodologies developed throughout the state, assistance from an ad hoc advisory committee comprised of community development staff from each of the cities and the county, and input during a comment period window for the Draft RHNA Methodology from February 2, 2022, through March 4, 2022, and during a public hearing on the draft RHNA Methodology at a meeting on February 24, 2022, including one public comment at its public hearing and one written comment within the public comment window; and,

WHEREAS, SJCLOG, with the assistance of the ad hoc advisory committee and input from stakeholders, developed an SJCLOG Board-approved methodology for allocating the region’s housing needs by jurisdiction and family income category; and,

WHEREAS, the methodology, as outlined in the Regional Housing Needs Plan (RHNP) and prior reports, is consistent with the RHNA objectives and takes into consideration the RHNA factors, local jurisdiction land-use plans, housing market demand, public facilities, suitable sites, travel patterns, employment projections, percentage of lower-income households, and other local planning and demographic factors and principles; and,

WHEREAS, the methodology ensures that the distribution of the housing units does not disproportionately concentrate lower-income households in jurisdictions that already have high proportions of lower-income households; and,

WHEREAS, the Act requires that SJCLOG develop and adopt a RHNP prior to the due date for each housing element cycle; and,

WHEREAS, in developing the 2022 RHNP, SJCOC has followed all steps and requirements of California Government Code § 65584, as applicable; and,

WHEREAS, SJCOC has received no request for further revisions from member jurisdictions or members of the public for the 2022 RHNP; and,

WHEREAS, the RHNP was developed in conjunction with the 2050 Regional Transportation Plan and accompanying Sustainable Communities Strategy (RTP/SCS), also known as Envision 2050, to support the connection between planning and transportation, land-use, and housing to assist in meeting the region’s greenhouse gas (GHG) reduction targets set by the California Air Resources Board as required by Senate Bill 375 (SB 375); and,

WHEREAS, the RTP/SCS growth forecast dated September 10, 2021, is the foundation for the RTP/SCS land-use patterns and the RHNA allocation for the sixth housing element cycle, which helps ensure consistency between these two planning efforts, including with regard to development patterns; and,

WHEREAS, the RHNP allocates both “projected need” and “existing need” in a manner that is consistent with the development pattern and aligned with the strategies and policies of the RTP/SCS; and,

WHEREAS, the RHNP specifically furthers the objectives in California Government Code § 65584, subdivision (d), and HCD completed its review of the methodology on May 19, 2022, and similarly found that it furthers the statutory objectives described in Government Code 65584, subdivision d; and,

WHEREAS, the intent of the RHNP and the resulting allocations to the individual jurisdictions will assist the region in meeting its housing needs in the four family income categories, meeting its GHG targets, addressing the transportation needs identified in Envision 2050, and helping reduce vehicle miles traveled; and,

WHEREAS, in accordance with Government Code § 65584.05(g), 1) SJCOC must adopt the RHNP at a public hearing, 2) notice of the public hearing regarding SJCOC’s consideration of the adoption of the RHNP was properly posted on or about XX, 2022, and 3) SJCOC held the required public hearing on XX, 2022; and,

NOW, THEREFORE BE IT RESOLVED that the SJCOC Board of Directors hereby adopts the final RHNP for the sixth housing element cycle (2023-2031).

PASSED AND ADOPTED this XX day of June 2022 by the following vote of the San Joaquin Council of Governments, to wit;

AYES:

NOES:

ABSENT:

LEO ZUBER
Chair

EXECUTIVE SUMMARY

The Regional Housing Needs Allocation (RHNA) sets forth the total number of housing units that each city and the unincorporated county must plan for during the specified planning period. This document, the Regional Housing Needs Plan (RHNP), is the official assignment of unit totals to the jurisdictions in San Joaquin County. Each jurisdiction is responsible for updating the housing element of their respective general plans to demonstrate the manner in which they will meet the allocated housing unit growth. For this cycle, the sixth (6th) for San Joaquin County, the allocation covers the projection period beginning June 30, 2023, and ending December 31, 2031.

Preparation of the RHNA is mandated by California Government Code § 65584. The law requires that the California Department of Housing and Community Development (HCD) project housing construction needs at the county level. SJCOC is responsible for developing a methodology to sub-allocate the county-level projection. The law requires, as the initial step in the RHNA process, that HCD project overall housing unit needs at the regional level for the planning period, then further divide the housing need into four income categories. This division is intended to ensure adequate affordable housing for all income levels in the region. To accomplish this, HCD utilized population and employment projections from the SJCOC Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS) and the most recent projections by the California Department of Finance (DOF) as the basis of their housing need determination for the San Joaquin County region. In addition, HCD uses the most recent Census data to distribute housing units among the income levels of very-low, low, moderate, and above-moderate, calculated as a percent of median income.

In consultation with SJCOC staff, HCD determined that San Joaquin must plan for 52,719 housing units across four income categories over the Housing Element planning period from December 31, 2023, through December 31, 2031. HCD considered all the information specified in state housing law (Government Code § 65584.01(c)). As a result of recent changes in state law, HCD applied a vacancy adjustment, an overcrowding adjustment, a replacement adjustment, and a cost-burden adjustment, which resulted in a higher total regional housing need. SJCOC received the final regional allocation by family income category on December 21, 2021. The Regional Housing Need Determination (RHND) for the region for the period of June 30, 2023, through December 31, 2031, is as follows:

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.

As noted, SJCOG is mandated to develop a methodology to distribute the regional allocation of 52,719 housing units to the incorporated cities and the unincorporated area within the San Joaquin region. In addition, SJCOG must maintain these family income percentages and the corresponding number of units on a countywide basis as it allocates units to each of the eight (8) local jurisdictions.

The housing units to be allocated as part of SJCOG’s RHNP are not a forecast of building or housing permits, nor are local agencies responsible for constructing housing. However, state law requires local jurisdictions to affirmatively further fair housing and to adequately plan to meet the identified housing needs. In accordance with Government Code § 65584, local jurisdictions “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.” Additionally, Government Code § 65584 calls on jurisdictions to take “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.” Further, in accordance with § 65583(c)(3), Housing Elements must “Address and, where appropriate and legally possible, remove governmental and nongovernmental constraints to the maintenance, improvement, and development of housing, including housing for all income levels and housing for persons with disabilities.” Senate Bill 375, passed in 2008, requires housing allocations to the jurisdictions to be consistent with the land-use development pattern in the RTP/SCS.

In the development of this methodology, SJCOG considered best practices in the 6th Cycle Methodologies developed throughout the state. Additionally, an ad hoc advisory committee comprised of community development staff from each of the cities and the county met a total of four times in 2021 to provide input on the development of the 6th Cycle Methodology. After considering comments regarding the methodology and responding accordingly, the resulting jurisdictional allocations, by income level, are as follows:

Table 2: Factor Adjusted RHNA Housing Unit Determination

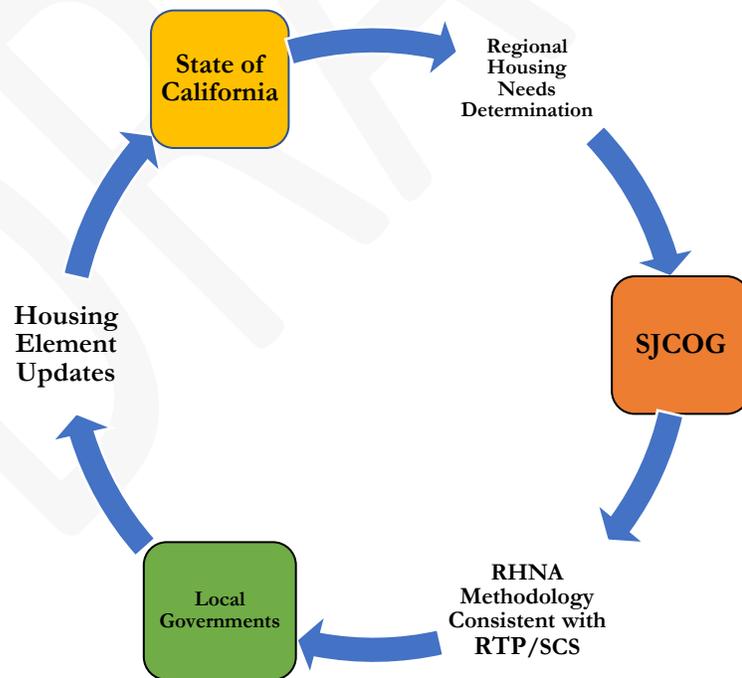
Jurisdiction	Total RHNA Allocation	Very-Low Income Units	Low-Income Units	Lower-Income (Very-Low & Low-Income)	Moderate Income Units	Above-Moderate-Income Units	Higher-Income (Moderate & Above-Moderate-Income)
Escalon	367	92	54	146	80	142	221
Lathrop	8,402	2,149	1,735	3,884	1,360	3,158	4,518
Lodi	3,909	916	617	1,533	753	1,623	2,377
Manteca	8,306	2,148	1,507	3,654	1,465	3,186	4,651
Ripon	1,423	311	254	565	263	596	859
Stockton	12,673	2,465	1,548	4,014	2,587	6,072	8,660
Tracy	8,830	2,567	2,306	4,873	1,454	2,504	3,957
Unincorporated County Areas	8,808	1,837	1,132	2,969	1,757	4,082	5,839
Total San Joaquin County	52,719	12,484	9,153	21,637	9,719	21,363	31,082

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

I. INTRODUCTION AND BACKGROUND

Beginning with the 1969 passage of California’s first requirement for local jurisdictions to prepare a housing element, then following from various changes in state law over time, the State of California requires each jurisdiction to plan for housing its existing and projected population and to demonstrate that the plan can provide a mix of housing for people at various income levels. Legislation passed in 1970 required HCD to prepare a statewide housing element, while 1971 legislation began requiring local jurisdictions to follow HCD guidelines for the preparation of housing elements. In 1980, new state law required local jurisdictions to review and update their local housing elements every five years, and the law deemed HCD guidelines as advisory but required the local jurisdictions to consider comments from HCD prior to the adoption of a local housing element. Furthermore, in the 1980s, HCD began assigning regional housing goals based on population projections from the California Department of Finance (DOF), and the first two mandated RHNA cycles occurred in 1981 and 1984-1986.¹ The RHNA period covering 1990-1997 was called the Fair Share Housing Plan. Changes in the law in the mid-1990s exempted Councils of Governments (COGs) from preparing an allocation for the mid-1990s cycle. The law was amended to establish a new due date and a staggered four-year preparation cycle for regions around the state. Senate Bill (SB) 375 changed the timing of the RHNA again by linking the process to the adoption of the RTP/SCS. Although RHNA now typically covers an eight-year period, the fifth cycle of the process covered a ten-year period to better align it with the RTP/SCS update cycle. This is now the region’s sixth (6th) RHNA Cycle, which again covers an eight-year period.

Figure 1: RHNA Process Overview



¹ Lewis, P. (2003), California’s Housing Element Law: The Issue of Local Noncompliance, Public Policy Institute of California. Available online at https://www.ppic.org/wp-content/uploads/content/pubs/report/R_203PLR.pdf.

The law requires that HCD project housing construction needs at the county level, then SJCOG is responsible for developing a methodology to suballocate the county-level projection. Thus, the allocation consists of two main steps:

- 1) HCD determines the total housing need, the RHND, for each region in California.
- 2) As the COG for San Joaquin County, SJCOG is responsible for distributing this housing need to local governments.

SJCOG received a draft of its regional determination for this 6th RHNA Cycle (2023 – 2031) from HCD in fall 2021 (see **Attachment A: HCD Determination Letter**). Through the consultation process with HCD, SJCOG staff provided additional data on comparable regions experiencing overcrowding and was able to reduce the overall regional determination from 53,640 to 52,719 units. HCD provided SJCOG with its final RHND of 52,719 units on December 21, 2021.

SJCOG developed the proposed RHNA methodology to allocate the RHND among member jurisdictions. The RHNA methodology includes four steps:

- 1) Determine each jurisdiction’s total RHNA before it is divided by income categories. This is determined by multiplying the total RHND by the proportion of household growth attributed to each jurisdiction in the forecast for the RTP/SCS between 2023 and 2031.
- 2) Determine jurisdictional allocations by income category according to those specified in the RHND.
- 3) Apply three adjustment factors (jobs-housing fit factor, regional income parity factor, and affirmatively furthering fair housing factor) to each jurisdictions’ lower-income units according to their respective factor weights and then use the sum of those factors to increase or decrease the jurisdictions’ total lower-income units.
- 4) Realign the jurisdictional factor adjusted housing unit allocations to those specified in the RHND.

It is important to note that the methodology has incorporated a Maximum Factor Adjustment Value (MFAV), which limits any factor adjustment to a doubling of the jurisdiction’s increase or decrease in lower-income housing unit allocation.

Preparation of the RHNA is mandated by California Government Code § 65584 (see **Housing Element and RHNA Law**). The RHNA must be consistent with the forecasted development pattern from the RTP/SCS (e.g., see Government Code § 65584.04(m)) and must meet the following statutory objectives identified in California Housing Element Law (Government Code §§ 65580-65589.11).

- 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 socio-economic equity, the protection of environmental and agricultural resources, the encouragement of efficient development patterns, and the achievement of the region’s greenhouse gas reduction 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.

The RHNA methodology allows for some discretion. However, state laws, such as in Government Code § 65584(d) and Government Code § 65584.04(e), require SJCOG to further the aforementioned objectives and to consider and include several additional factors to the extent that sufficient data is available. So long as either the factor is specifically listed in 65584.04(e) or 1) SJCOG 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. SJCOG then makes a finding that any factors not already listed in 65584.04(e) are necessary to address significant health and safety conditions. These additional factors from Government Code § 65584.04(e) are further described below.²

FACTOR 1. JOBS HOUSING RELATIONSHIP

This factor requires a 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 THE 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 precludes the jurisdiction from providing the necessary infrastructure for additional development during the planning period.

Availability of underutilized land or land suitable for urban development or for conversion to residential use, as well as opportunities for infill development and increased residential densities. Consideration must include the potential for increased residential development under alternative zoning ordinances and land-use restrictions. However, available land suitable for urban development may exclude land 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.

² Descriptions are taken from:

https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=GOV§ionNum=65584.04. on 9/7/2021.

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.

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 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 EMISSION TARGETS

This factor considers the region's greenhouse gas emissions (GHG) targets in its allocation of housing units to jurisdictions.

FACTOR 13. OTHER COUNCIL OF GOVERNMENTS 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.

Factors 6, 7, 10, 11, and 12, as well as the clause in factor 1 calling for special consideration of the balance between low-wage jobs and affordable housing, are some of the new requirements for this RHNA cycle. HCD completed its review of the methodology on May 19, 2022, and found that it furthers the statutory objectives described in Government Code 65584(d) (see **Attachment B: RHNA Methodology Consistency Determination from HCD**). Thus, as outlined throughout this RHNP, the RHNA Methodology for the sixth RHNA Cycle furthers the five statutory objectives while considering the other factors as well. As part of the RHNA Methodology, all jurisdictions were provided the opportunity to review the objectives in Government Code § 65584 and factors in § 65584.04 to consider any opportunities and constraints to the development of additional housing in each member jurisdiction. Results from a related survey, including common issues, strategies, opportunities, constraints, actions, and best practices from the jurisdictions, were reviewed for the development of the RHNA Methodology and are compiled, revised, and shared herein (See **Report on the Jurisdictional Survey of the Housing Environment**).

This document, the RHNP, utilizes the RHNA process to date and is the official assignment of unit totals to the jurisdictions in San Joaquin County. Each jurisdiction is responsible for updating the Housing Element of their respective General Plans to demonstrate the manner in which they will meet the allocated housing unit growth. For this cycle, the allocation covers the Housing Element planning period of December 31, 2023, through December 31, 2031. The last time a housing needs allocation plan was adopted by the SJCOG Board was in August 2014; it allocated 40,360 units and covered the planning period from January 1, 2014, through December 31, 2023. As a result of recent changes in state law, HCD applied a vacancy adjustment, an overcrowding adjustment, a replacement adjustment, and a cost-burden adjustment, which resulted in a higher total regional housing need for this 6th Cycle than in the previous RHNA cycles (a need for 12,359 more housing units).

When local jurisdictions update their General Plan Housing Elements, they must demonstrate sufficient zoning capacity to meet the estimated housing need in each income category. For the low and very-low-income categories, this generally requires the housing element to identify sites zoned for multi-family density ranges. The housing units to be allocated as part of SJCOG's RHNP are not a forecast of building or housing permits, nor are local agencies responsible for constructing housing. In other words, HCD recognizes that future housing production may not equal the regional housing need established for planning purposes. Instead of mandating the construction of units, the Housing Element law is designed to ensure that jurisdictions do not impede the construction of housing in any one income category. It is recognized that housing construction is subject to market forces and other factors that may be outside of a jurisdiction's control.

II. RHNA PROCESS AND PREPARATION SCHEDULE

Table 3: RHNA Schedule

Date	Estimated Deliverable Dates
January 2021 – February 2022	<p>Preparation of Methodology:</p> <ul style="list-style-type: none"> • Convening an ad hoc advisory committee with representation from each jurisdiction to assist SJCOG staff with the development of a proposed methodology • Outreach to local jurisdictions, including a survey to members regarding RHNA factors and affirmatively furthering fair housing • Receive Regional Housing Needs Determination from HCD (December 21, 2022) • Consultations with HCD staff on the overall RHNA determination and the methodology to allocate total housing need to each jurisdiction in the county • Hosting a virtual stakeholders workshop to provide information to interested parties about the proposed methodology and to invite discussion on regional housing solutions (January 12, 2022) • Review and discussion of the proposed methodology by SJCOG Board (January 27, 2022) • Issuance of the proposed methodology for public review and comments (February 2, 2022)
February 2022 – June 2022	<p>Review and Adoption of Methodology:</p> <ul style="list-style-type: none"> • Public Comment Period (February 2, 2022, through March 4, 2022) • Regional Housing Symposium (February 22-23, 2022) • Public Hearing about the Proposed Methodology (February 24, 2022) • 60-day review of draft methodology by HCD (March 23, 2022, through May 22, 2022) • SJCOG adopts final RHNA methodology and publishes the adopted methodology, along with its resolution and any adopted written findings, on SJCOG website (June 2022)
June 2022 – July 2022	<p>Preparation and Adoption of RHNP and RTP/SCS:</p> <ul style="list-style-type: none"> • SJCOG issues draft RHNA allocation in RHNP to local jurisdictions before the completion of the RTP/SCS update (June 2022) • SJCOG/MPO releases Final RTP w/SCS accommodating RHNA and adopts the RTP/SCS 18 months prior to the Housing Element update (August 2022) • 45-day window for local jurisdictions to appeal draft RHNA allocation (August 8, 2022) • If no appeals or revisions received by August 8, SJCOG holds public hearing and adopts final RHNP and submits final RHNP within 3 days of adoption to HCD for review within 30 days of receipt (September 22, 2022)

III. REVIEW AND APPROVAL OF THE REGIONAL HOUSING NEEDS PLAN

As mentioned in the schedule above, prior to the approval of the RHNP, specific plan reviews and appeals must be considered. At the very minimum, a 45-day public review period as outlined in subsection (b) of Government Code § 65584.05 will be provided to local governments. If any local government disagrees with the RHNA allocation as determined by SJCOG, a revision of its share may be considered, which will then trigger the following actions within the time periods outlined below.

Revision Request (45 days)—A jurisdiction may propose to revise the determination of its share of the regional housing need in accordance with the considerations set forth in Government Code § 65584.05 (a) within 45 days of receiving the draft allocation. The proposed revised share shall be based upon available data and accepted planning methodology and supported by adequate documentation. Any proposed revision to a jurisdiction’s housing need will require a compensating adjustment to one or more of the other jurisdiction’s housings needs to maintain the total housing need within the region. Within this period, a copy of the Draft RHNA may be submitted to HCD requesting a review for consistency with the statewide housing need which may result in revisions to the Draft RHNA to obtain consistency.

SJCOG Action on Revision Requests—Within 45 days of receiving a timely request for revision to the Draft RHNA, SJCOG shall either accept the proposed revision and modify the Draft RHNA or indicate, based upon available data and accepted planning methodology, why the proposed revision is inconsistent with the regional housing need.

Appeal Request and Public Hearing—A jurisdiction shall have the right to appeal SJCOG’s denial of a revision request within 45 days of the date established by SJCOG to file a timely appeal. No later than 30 days after the close of the comment period, and after providing all local governments at least 21 days prior notice, the SJCOG shall conduct one public hearing to consider all appeals filed pursuant to subdivision (b) and all comments received pursuant to subdivision (c) of Code § 65584.05. The appealing jurisdiction shall be notified by certified mail, return receipt requested, of at least one public hearing on its appeal.

Final Determination—Before making its final determination, SJCOG shall consider comments, recommendations, available data, accepted planning methodology, and local geological and topographical restraints on the production of housing. If SJCOG accepts a revision or appeal and modifies its earlier determination, the city or county shall use the revised determination. If SJCOG grants a revised allocation, pursuant to Government Code § 65584(c)(1), the current total housing need must still be maintained. If, however, SJCOG indicates that the revision or appeal is inconsistent with the regional housing need, the jurisdictions will be required to use the original shares as previously determined.

IV. PROJECTED HOUSING NEED FOR THE SAN JOAQUIN COUNTY REGION

SJCOG received a draft of its regional determination for this sixth (6th) Cycle RHNA (2023 – 2031) from HCD in fall 2021. Through the iterative consultation process with HCD, SJCOG staff provided additional data on comparable regions experiencing overcrowding and was able to reduce the overall regional determination from 53,640 to 52,719 units. Subsequently, on December 21, 2021, SJCOG was notified by HCD that the county-wide allocation for the 8-year projection period (beginning June 30, 2023, and ending December 31, 2031) is 52,719 total units across four income categories. Refer to the **HCD Determination Letter** with county-wide housing unit totals by income category and an explanation of the RHND.

In completing the RHND for SJCOG, HCD included the following assumptions as specified in the applicable sections of the law, including Government Code § 65584.01:

- 1) Anticipated household growth associated with projected population increases;
- 2) Household size data and trends in household size;
- 3) The percentage of households that are overcrowded and the overcrowding rate for a comparable housing market;
- 4) Rate of household formation, or headship rates, based on age, gender, ethnicity, or other established demographic measures;
- 5) Vacancy rates in existing housing stock, and for healthy housing market functioning and regional mobility, as well as housing replacement needs;
- 6) Other characteristics of the composition of the projected population;
- 7) Relationship and any imbalance between jobs and housing;
- 8) The percentage of cost-burdened households and the rate of the housing cost-burden for a healthy housing market; and
- 9) 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.

The law requires, as the initial step in the RHNA process, that HCD project overall housing unit needs at the regional level for the period, then further divide the housing need into four income categories. This division is intended to ensure adequate affordable housing for all income levels in the region. To accomplish this, HCD extrapolated population and employment projections from the SJCOG RTP/SCS and the most recent projections by the California Department of Finance (DOF) as the basis of their housing need determination for the region. As a result of recent changes in state law, HCD applied the aforementioned vacancy adjustment, an overcrowding adjustment, a replacement adjustment, and a cost-burden adjustment, which resulted in a higher total regional housing need for this 6th Cycle than in the previous RHNA cycle (a need for 12,359 more housing units). In addition to these projections, HCD uses the most recent Census data to distribute housing units among the income levels of very-low, low, moderate, and above-moderate, calculated as a percent of median income. HCD utilized the 2015-2019 5-year American Community Survey (ACS) data for determining the income category percentages for this cycle of RHNA.

The income category formulas are defined within *Table 4: Household Income Categories* (see below).

Table 4: Household Income Categories

Income Category	Category Description
Very-Low:	Income not exceeding 50% median family income in the county
Low:	Income between 50% and 80% of median family income
Moderate:	Income between 80% and 120% of median family income
Above-Moderate:	Income above 120% of median family income

The median household income from the 2015-2019 ACS data set for San Joaquin County is \$64,432.

The result of the calculation is shown in the following table. For example, census data shows that 23.5% of the households in San Joaquin County had very-low-incomes relative to the median. Therefore 23.5% of the housing units allocated for the period must be accessible to households in this income category.

Table 5: RHND by Income Category

Income Category*	Percent	Housing Unit Need
Very-Low**	25.2%	13,293
Low	15.8%	8,344
Moderate	17.5%	9,231
Above-Moderate	41.4%	21,851
Total	100%	52,719

*Income Distribution: Income categories are prescribed by California Health and Safety Code (Section 50093, et. seq.). Percent figures are derived based on ACS reported household income brackets and county median income.

**The Extremely Low-income category (not exceeding 30% of the county median family income), is included in the Very-Low-income category and accounts for 13.1% of the total housing needs.

† Likely due to rounding, the percentage total comes out 99.9% (percentages shown were provided by HCD)

SJCOG must maintain these family income percentages and the corresponding number of units on a countywide basis as it allocates units to each of the eight (8) local jurisdictions.

V. OVERVIEW OF RECENTLY PASSED RHNA LEGISLATION

With the passage of the Sustainable Communities and Climate Protection Act of 2008, also known as Senate Bill (SB) 375, the RHNA process became integral to the Regional Transportation Plan (RTP). The bill mandates that each of California’s Metropolitan Planning Organizations (MPOs) prepare a Sustainable Communities Strategy (SCS) as part of its RTP. SB 375 seeks to reduce greenhouse gas emissions reductions through coordinated transportation and land-use planning. Prior to SB 375, the RHNA was an independent analysis from the RTP/SCS. SB 375 requires that the two processes be coordinated and that the RHNA allocations to the jurisdictions be consistent with the general land-use development pattern in the RTP/SCS.

In addition to the RHNA requirements in the Housing Element law (see, e.g., Government Code § 65584), SB 375 requires the RTP to:

- 1) Consider the State housing goals
- 2) Identify areas within the region to house all the population of the region, including all economic segments of the population over the course of the planning period for the RTP, and
- 3) Identify areas within the region sufficient to house the regional housing needs for the region

SJCOG’s RTP/SCS demonstrates consistency with these requirements and the RHNP is consistent with the general land-use pattern and household projections within the RTP. Further, as noted above, the final RHNA methodology’s baseline allocation incorporates the forecasted development pattern from the RTP/SCS.

Recent legislation, since the fifth RHNA cycle, made several changes to this sixth RHNA cycle, which collectively increased the recognized number of units needed in the region and HCD oversight. As a result of the passage of SB 828 and AB 1771 in 2018, HCD now assesses the region’s total housing needs, including both existing and projected needs. In order to do this, HCD now considers several additional factors, including cost-burdened households (households spending more than 30% of their household income on housing), overcrowded households (households with more than one occupant per room), and a target vacancy rate. See the **HCD Determination Letter** for details on these adjustments. SB 828 and AB 1771 also increased transparency and public engagement with the RHNA process, as well as opportunities for appeals. Additionally, the new legislation included new survey requirements and revised objectives for the RHNP to further, including a new objective to increase access to areas of high opportunity for lower-income residents while avoiding displacement and affirmatively furthering fair housing.

As required by law, SJCOG has surveyed local governments to understand fair housing issues, strategies, and actions across the region. See **Report on the Jurisdictional Survey of the Housing Environment** for more on the resulting survey that informed the development of the RHNA methodology and compiled information related to fair housing issues, strategies, and actions, including significant barriers to affirmatively furthering fair housing at the regional level, recommended strategies or actions to overcome those barriers, and common themes and effective strategies employed by member jurisdictions to avoid the displacement of lower-income households.

VI. OVERVIEW OF PUBLIC OUTREACH AND PARTICIPATION

Regarding state law and public participation requirements for the RHNA process, Government Code § 65584.04(d) states the following:

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. [Protected classes include “race, color, religion, sex, gender, gender identity, gender expression, sexual orientation, marital status, national origin, ancestry, familial status, source of income, disability, veteran or military status, or genetic information of that person.”] 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.

In the development of the RHNA methodology, SJCOC considered best practices in the 6th Cycle Methodologies developed throughout the state. Additionally, an ad hoc advisory committee comprised of community development staff from each of the cities and the county met a total of four times between February 2021 and December 2021 to provide input. The comment period window for the methodology was open from February 2, 2022, through March 4, 2022. The SJCOC Board of Directors considered public comments during a public hearing on the draft RHNA Methodology at their meeting on February 24, 2022. SJCOC received one public comment at its public hearing and one written comment within the public comment window. SJCOC staff considered public comments and responded accordingly.

RHNA-related staff reports were presented to SJCOC’s standing committees and policy board in the months of January, June, and October 2021, as well as in January and February 2022. On January 12, 2022, SJCOC hosted a sixth (6th) Cycle RHNA virtual workshop for San Joaquin County housing stakeholders. In accordance with state law, a public comment period opened on February 2, 2022, and closed on March 4, 2022. SJCOC hosted a Regional Housing Symposium on February 23 and 24, 2022, which was another opportunity for outreach and public participation. And, in addition to the aforementioned workshop, committee meetings, and symposium, a public hearing took place on February 24, 2022, at the regularly held SJCOC Board meeting. Further, SJCOC provided public notice in English and Spanish on the SJCOC RHNA webpage at <https://www.sjcog.org/113/Regional-Housing-Needs-Allocation>, on the SJCOC Press Releases, Hearings, & Public Notices webpage at <https://www.sjcog.org/270/Press-Releases-Hearings-Public-Notices>, and via email to over 230 interested parties who signed up at <https://www.sjcog.org/126/4299/Public-Information> for notifications.

The Draft RHNA Methodology Framework Report was posted online on the SJCOG RHNA website in advance of the public comment period. The SJCOG RHNA website’s listed contacts include SJCOG’s Senior Regional Planner assigned to this process. Members of the public were invited to submit comments at the public hearing, as well as via mail and email during the public comment period. The aforementioned process exceeds legal requirements and attempts to facilitate an inclusive engagement of all interested stakeholders.

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VII. Growth Projections for the RTP/SCS and RHNA

As noted above, SB 375 required, for the second time since the RHNA process was implemented, that the RHNA be integrated with the RTP/SCS such that RHNA is consistent with the general land-use development pattern in the RTP/SCS. Thus, the RHNA and the RTP/SCS projections and generalized land-use pattern were developed in tandem, including with insights from public outreach and participation. While the RTP/SCS growth forecast forms the basis of the RHNA calculation and the final RHNA calculation must be consistent with the overall development pattern in the RTP/SCS, there are some differences between the two processes. The RTP/SCS forecast utilizes population and households as the basis for its analysis; it seeks to forecast the probable location of new households in the region based on market conditions and other policy factors. The RHNA process estimates housing units and is intended to identify adequate housing capacity within each jurisdiction. Additionally, although HCD utilized the RTP/SCS population forecast for the RHND, there was some variation in the assumptions utilized when converting the population to households, and, ultimately, to the final housing unit determination. The final determination was based on a blending of the assumptions underlying the RTP/SCS and initial RHNA forecasts.

Regional land-use projections are developed as part of the RTP/SCS process. The current RTP/SCS from 2018 made land-use projections based on the forecast at that time, and the RTP/SCS update will similarly make land-use projections utilizing the latest forecast utilized by the RHNA. It is a cyclical and interrelated process. By forecasting population, households, and employment, including demographic characteristics thereof, the forecast helps align and inform the development of the interrelated RHNA, RTP/SCS, and local planning efforts throughout San Joaquin County. Thus, the forecast is both informed by and informing strategies for meeting infill, environmental, and equity-based land-use goals for the region and its jurisdictions.

Local area forecasts consider existing planning documents, as well as growth capacities in Municipal Service Reviews, and help inform future planning efforts (e.g., updates to General Plans and Housing Elements). In local Housing Elements, member jurisdictions must identify sites zoned to fully accommodate the RHNA (see Government Code § 65583(a)), which furthers the regional infill, efficient growth patterns, and GHG emission reduction targets supported by the RHNA, which is itself also reflected in the RTP/SCS. While local jurisdictions retain broad land-use authority, local jurisdictions that choose to implement plans, programs, and projects in line with the policies and strategies of the RTP/SCS qualify for additional funding, incentives (e.g., CEQA streamlining), and resources to further encourage alignment.

The forecast is an informed prediction, which considers data, as well as policies and projects in planning documents and feedback from local jurisdictions. The forecast further supports equity and infill development, including GHG emission reduction targets, by informing the RTP/SCS and RHNA, which aims to focus housing units in areas of opportunity near projected job centers at costs affordable to a diversity of households. By utilizing a consistent baseline established by the forecast, the RHNA furthers infill development and equity goals on its own and through the RTP/SCS and local planning efforts aligned with a common baseline projection of growth—and these efforts also help inform subsequent forecasts.

The RTP/SCS utilizes the forecast to help develop a long-range vision and investment plan to meet projected transportation needs in furtherance of economic, environmental, and public health goals. By using the same baseline growth projections as the RHNA, the policies and strategies of the RTP/SCS support a consistent level of growth and comprehensively plans for meeting the resultant housing needs in a way that contributes to the reduction in GHG emissions and that favors infill development and efficient growth patterns equitably in each of San Joaquin County’s jurisdictions. Like the forecast, the RTP/SCS, which is updated every four years, considers existing land-use projections. The RTP/SCS also informs future land-use projections in an iterative process directed toward the development of a sustainable community. The RTP/SCS also incorporates feedback from a variety of perspectives, including those related to economic development, environmental preservation, air quality, public health, environmental justice, and farmland conversion/preservation, for example.

Whereas the RTP/SCS utilizes the forecast to identify ways that land-use development and transportation can meet GHG emission reduction targets set by the California Air Resources Board (CARB), the RHNA utilizes the forecast to help assess and allocate local housing needs identified by HCD. RHNA does not rely exclusively on the RTP/SCS to further the infill, sustainability, and equity objectives. As discussed elsewhere, RHNA is required to meet 5 statutory objectives outlined in Government Code § 65584(d), which relate to 1) increasing the housing supply and mix of housing types, 2) promoting infill, equity, and the environment, 3) ensuring a jobs-housing balance and fit, 4) promoting regional income parity, and 5) affirmatively furthering fair housing. The RHNA aims to support these objectives through a variety of methods. For example, as outlined in more detail in the RHNA, the RHNA supports the second statutory objective mentioned above, “promoting infill, equity, and the environment,” through its Affirmatively Furthering Fair Housing Factor and Jobs-Housing Fit Factor adjustments. Furthermore, the RHNA excluded rural areas in the Opportunity Areas adjustment factor in order to promote equitable and sustainable infill development in urban job centers, lessening the need for driving to get to destinations. HCD completed its review of the methodology on May 19, 2022, and found that it furthers the aforementioned statutory objectives described in Government Code 65584(d) (see **Attachment B: RHNA Methodology Consistency Determination from HCD**).

VIII. CONSTRAINTS AND STRATEGIES

As discussed in more detail in the **Report on the Jurisdictional Survey of the Housing Environment**, jurisdictions responding to the survey included in the **Jurisdictional Survey of the Housing Environment** mention a variety of constraints while attempting to meet their share of regional housing needs. Recently, SJCOG’s “Community, Diversity, and Displacement Study” similarly recognized that “All jurisdictions interviewed indicated a need for more funding overall and funding diversity” to address housing challenges, infrastructure needs, and technical assistance.³

Most member jurisdictions do not have a current Analysis of Impediments to Fair Housing Choice or an Assessment of Fair Housing; however, a majority of jurisdictions cite infrastructure needs and construction costs as significant impediments to the construction of a variety of types of affordable housing. According to the survey, the greatest obstacles recognized by member jurisdictions include community opposition, availability of funding and financing for affordable housing, lack of requisite infrastructure such as sewer and water, local gap financing for affordable housing, state requirements to reduce vehicle miles traveled, and local affordable housing development capacity. Two jurisdictions provided additional responses, which listed development agreements and lack of financial incentives for developers and builders as additional obstacles in their jurisdiction.

Jurisdictions also identified construction workforce, cost of construction, availability of water suitable for consumption, county policies to preserve agricultural land, zoning/land-use restrictions (density/intensity/height limits, parking requirements, minimum lot size), lack of resources for fair housing agencies and organizations, lack of market demand, lack of fair housing education, discrimination, the impacts of climate change and natural disasters, and utility connection fees as constraints on the development of additional housing by 2031.

Additional constraints realized by member jurisdictions include concern over the availability of state and federal funding specifically, the unpredictability and inconsistency of new legislation, the market effects of Bay Area housing prices, a need for builder liability reform for condominiums and townhouses, and higher developer return on investment in other jurisdictions competing for housing. Overall, jurisdictional responses to the survey demonstrate the significance of the availability of funding, infrastructure, land, and water, and the potential for jurisdictions to develop programs to respond to the constraints and opportunities identified in each jurisdiction with additional funding, capacity building, and technical assistance.

The most utilized strategies to reduce GHG emissions while addressing housing include land-use changes that encourage a diversity of housing types and/or mixed-use development, as well as investment in pedestrian, bicycle, and active transportation infrastructure. A majority of jurisdictions responding to the survey indicated that they utilized the strategy of implementing energy efficiency standards in new construction or retrofits. Many jurisdictions also reported that they adopted policies to encourage mixed-use development, to develop a climate plan, to invest in maintaining and improving current transportation infrastructure, and to encourage development near transit.

³ See the “Community, Diversity, and Displacement Study,” p. 20, at <https://www.sjco.org/DocumentCenter/View/6879/SJCOG-Enterprise-Displacement-Study?bidId=>.

To overcome historical patterns of segregation or to remove barriers to equal housing opportunity, most jurisdictions indicated that the following actions were either in use, under consideration for use, or potentially of interest for use in the jurisdiction:

1. Dedicated local funding source for affordable housing development,
2. Land-use changes to allow a greater variety of housing types,
3. Streamlining entitlements processes,
4. Removing development fees for affordable housing construction,
5. Funding rehabilitation and accessibility improvement for low-income homeowners,
6. Supporting affordable housing development near transit,
7. Supporting the development of additional housing for special needs populations (seniors, the disabled, those experiencing homelessness, those with mental health and/or substance abuse issues, etc.),
8. Supporting the development of larger housing units that can accommodate families, and/or
9. Providing financial resources or other support for low-income home buyers.

Many jurisdictions also indicated that the following actions were either in use, under consideration for use, or potentially of interest for use in the jurisdictions:

1. Ensuring affirmative marketing of affordable housing is targeted to all segments of the community,
2. Exploring partnerships with Community Development Financial Institutions (CDFI),
3. Large regional employers and investors to add to the financial resources available for the creation and preservation of deed-restricted affordable housing units,
4. Funding and supporting outreach services for homeowners and renters at risk of losing their homes and/or experiencing fair housing impediments,
5. Implementing a rent stabilization policy and staffing a rent stabilization board, and/or
6. Supporting the development of affordable housing on publicly owned land.

Interestingly, none of the responding jurisdictions indicated utilizing “mobile home rent control”, “rent stabilization/rent control”, “foreclosure assistance”, “long term covenants”, or “relocation assistance” to prevent or mitigate the displacement of low-income households, which may provide some options to consider for the future.

IX. RHNA FACTORS AND RHNA METHODOLOGY

A. Overview

The state-mandated RHNA process 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: HCD provides each region with an RHND, which includes a total number of units split into four income categories. SJCOC received the RHND for the sixth (6th) Cycle RHNA (2023-2031) in December of 2021.
2. RHNA Methodology: COGs are responsible for developing a RHNA Methodology for allocating the RHND 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 section of this RHNP describes the adopted RHNA Methodology Framework for San Joaquin County’s 2023-2031 6th RHNA Cycle. The SJCOC Final Regional Determination for 6th Cycle RHNA (2023-2031), the RHND, is 52,719 units. That RHND was received on December 21, 2021, and includes adjustments for vacancy, replacement, overcrowding, and cost-burden as required by state law. In the development of this methodology, efforts on other 6th Cycle Methodologies were reviewed and incorporated as their demonstration of best practices warranted. To these ends, particular focus was given to the 6th RHNA Cycle Methodology used by the Sacramento Area Council of Governments and the methodology under development by Fresno COG. HCD completed its review of the methodology on May 19, 2022, and found that it furthers the statutory objectives described in Government Code 65584(d).

B. 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 RHND 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 6: Final HCD RHNA Determination for San Joaquin COG*.

Table 6: Final HCD RHNA Determination for San Joaquin COG

<u>Income Category</u>	<u>Income Limits</u>	<u>Percent</u>	<u>Housing Unit Need</u>	<u>Broad Income Category</u>	<u>Income Limits</u>	<u>Percent</u>	<u>Housing Unit Need</u>
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.

SJCOG, with input from elected officials, local staff, and stakeholders, developed 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 meets statutory objectives identified in California Housing Element Law (Government Code §§ 65580-65589.11) and is 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 laws, such as in Government Code § 65584(d) and Government Code §65584.04(e), require SJCOG to further a series of objectives and to consider and include several additional factors to the extent that sufficient data is available. So long as either the factor is specifically listed in 65584.04(e) or 1) SJCOG 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. SJCOG then makes a finding that any factors not already listed in 65584.04(e) are necessary to address significant health and safety conditions. This RHNA Methodology Framework develops that RHNA methodology, presenting a methodology for RHNA 6th Cycle that addresses the statutory objectives while considering the other factors as well. On May 19, 2022, HCD completed its review of the methodology and found that it furthers the aforementioned statutory objectives (see **Attachment B: RHNA Methodology Consistency Determination from HCD**).

Following the development and adoption of the RHNA methodology, this RHNP 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 RHNP, 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.

C. RHNA Objectives

State law requires SJCOG 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. The objectives, as described in Government Code § 65584(d), are described below.⁴

⁴ Descriptions are taken from:

https://leginfo.ca.gov/faces/codes_displaySection.xhtml?sectionNum=65584.&lawCode=GOV on 8/31/2021.

i. 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.

ii. OBJECTIVE 2. PROMOTE INFILL, EQUITY, AND ENVIRONMENT

Promoting infill development and socio-economic equity, the protection of environmental and agricultural resources, the encouragement of efficient development patterns, and the achievement of the region's greenhouse gas reduction targets provided by the State Air Resources Board pursuant to Section 65080.

iii. 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.

iv. 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 (ACS).

v. OBJECTIVE 5. AFFIRMATIVELY FURTHER FAIR HOUSING

Affirmatively furthering fair housing means taking meaningful actions, in addition to combating discrimination, that overcomes patterns of segregation and fosters 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 COG survey its member jurisdictions for information to inform the development of the RHNA Methodology and the RHNP. Therefore, a jurisdictional survey containing a series of questions related to these Objectives, the additional Factors required for consideration, and efforts for Affirmatively Furthering Fair Housing (AFFH) has been developed and circulated to member jurisdictions, as well as analyzed and incorporated throughout the RHNA process, including the development of the methodology and this RHNP. See **Report on the Jurisdictional Survey of the Housing Environment** and **Jurisdictional Survey of the Housing Environment**.

D. 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 RHNA Methodology determines each jurisdiction’s total base RHNA number by multiplying the total RHND from HCD by the proportion of household growth attributed to the jurisdiction in the forecast for the RTP/SCS between 2023 and 2031.

Table 7: RTP/SCS Forecast Households in 2031 by Jurisdiction

Jurisdiction	A	B	C
	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 7: RTP/SCS Forecast Households in 2031 by Jurisdiction 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.⁵ 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 for the jurisdictions in *Column C*.

Table 8: Initial RHNA Allocation by Jurisdiction and Calibration to Final HCD RHNA Determination

Jurisdiction	A	B	C	D
	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.

⁵ This report uses the San County RTP/SCS Forecast dated 9/10/2021 for these estimates. It is available here: <https://www.sjocog.org/DocumentCenter/View/6007/Demographic-and-Employment-Forecast-2020>

The second step determines jurisdictional allocations by income category according to those specified in the RHND. *Table 8: Initial RHNA Allocation by Jurisdiction and Calibration to Final HCD RHNA Determination* 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 jurisdiction's 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 9: 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 9: RHNA Determination by Jurisdiction Aligned to Broad Income Category Totals presents a summary of the jurisdictional allocations aligned to the RHND 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 of life goals.

E. Lower-Income Housing Units Adjustment Factors

The framework for the RHNA Methodology is oriented around furthering each of the statutory RHNA objectives. In *Table 10: RHNA Objectives and Allocation Adjustment Factors*, 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 through the assignment of housing units at different income categories to each jurisdiction of 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 10: 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	

i. 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 jurisdictions. 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 11: *Jobs-Housing Fit Factor Jurisdictional Variance* 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.⁶ 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.⁷

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.

⁶ In this report, 2018 jobs by jurisdiction data are used from the U.S. Census Bureau’s Longitudinal Employer-Household Dynamics (LEHD) program.

⁷ In this report, Contract Rent reported by jurisdiction in the U.S. Census Bureau’s American Community Survey (ACS) Table# B25056, 2019 5-Year Estimates is used to estimate affordable housing units.

Table 11: 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.

ii. 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 12: 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 12: *Regional Income Parity Factor Jurisdictional Variance* reports the regional income parity adjustment factors by jurisdiction for San Joaquin County. It uses the number of households with an income 80% or less than the area median income divided by the total number of households in the area to estimate the lower income share.⁸ 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.

iii. 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 13: *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 13: *Affirmatively Furthering Fair Housing Factor Jurisdictional Variance* 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.⁹ 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 doing so, this factor intends to open high opportunity jurisdictions to all economic segments.

⁸ 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.

⁹ 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.

iv. Application of the Adjustment Factors

The third step applies the three adjustment factors to each jurisdiction’s 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 11* for the City of Tracy has a ratio of 13.6 low-wage jobs per affordable housing 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 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 uses an 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 14: 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 14: Jurisdictions’ Lower-Income Factor Adjustment Allocations 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 11* 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 12* 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 13* 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 14* are affected, the Jobs-Housing Fit adjustment factors for the City of Tracy and for the City of Lathrop.

F. Factor Adjusted RHNA Determination

The fourth, and final, step re-aligns the jurisdictional factor adjusted housing unit allocations to those specified in the RHND. If San Joaquin County is to maintain the county-wide RHND 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 15: 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 15: Factor Adjusted Allocations Calibrated to Final HCD RHNA Determination details this adjustment process. In *Column A*, the jurisdictions’ factor-adjusted lower-income housing unit allocations from *Column K* of *Table 14* 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 RHND 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 RHND 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 16: 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 16: Factor Adjusted RHNA Housing Unit Determination reorganizes the data in *Table 15* 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 17: Comparison of Housing Unit Structure from Factor Adjustments*. It highlights the influence the RHNA Methodology has in promoting transformative housing opportunities in San Joaquin County.

Table 17: 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.

G. Detailed Housing Unit Need Allocation

In order to specify the minimum regional housing units across four income categories prescribed by California Health and Safety Code (Section 50093, et. seq.), it is necessary to distribute the Lower Income unit allocation between Very-Low Income and Low-Income categories and to distribute the Higher Income unit allocation between Moderate Income and Above-Moderate Income categories. That process requires taking the Draft Factor Adjusted RHNA Allocations reported in *Table 16: Factor Adjusted RHNA Housing Unit Determination* and using the existing component income distributions for each jurisdiction to derive their respective component allocations.

Table 18: Existing Detailed Income Distributions and Component Proportions

Column	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)
Income Category	Very - Low	Low	Moderate	Above-Moderate	Lower-Income [(A)+(B)]	Higher-Income [(C)+(D)]	Very-Low of Lower [(A)/(E)]	Low of Lower [(B)/(E)]	Moderate of Higher [(C)/(F)]	Above-Moderate of Higher [(D)/(F)]
Escalon	19%	11%	25%	45%	30%	70%	63%	37%	36%	64%
Lathrop	22%	18%	18%	42%	40%	60%	55%	45%	30%	70%
Lodi	25%	17%	19%	40%	41%	59%	60%	40%	32%	68%
Manteca	23%	16%	19%	42%	39%	61%	59%	41%	32%	68%
Ripon	21%	17%	19%	42%	39%	61%	55%	45%	31%	69%
Stockton	25%	15%	18%	42%	40%	60%	61%	39%	30%	70%
Tracy	19%	17%	23%	40%	36%	64%	53%	47%	37%	63%
Unincorp. / County	24%	15%	18%	42%	40%	60%	62%	38%	30%	70%

The first step in that process requires determining each jurisdictions’ household income by category, including county-wide household income for unincorporated areas. Using income reported by households in the U.S. Census Bureau’s American Community Survey (ACS), we compile and report the percentage for each in *Table 18: Existing Detailed Income Distributions and Component Proportions* above.¹⁰ Accordingly, the proportion of Very-Low Income, defined as less than 50% of area median income, is reported in *Column A*; Low-Income, defined as 50% to 80% of area median income, is reported in *Column B*; Moderate Income, defined as 80% to 120% of area median income, is reported in *Column C*; and Above-Moderate Income, defined as more than 120% of area median income, is reported in *Column D* of *Table 18*. Then the proportion of each income category is calculated by first taking their combined shares, as done in *Column E* in the case of the two Lower-Income categories (*Columns A + B*) and in *Column F* in the case of the two Higher-Income categories (*Columns C + D*), and then dividing them by each category. As a result, the Very-Low-Income portion of Lower-Income is reported in *Column G* by dividing *Column A* by *Column E*; the Low-Income portion of Lower-Income is reported in *Column H* by dividing *Column B* by *Column E*; the Moderate-Income portion of Higher-Income is reported in *Column I* by dividing *Column C* by *Column F*; and the Above-Moderate Income portion of Higher-Income is reported in *Column J* by dividing *Column D* by *Column F*.

Table 19: Components of RHNA Housing Unit Determination

Column	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)
Income Category	Very-Low of Lower	Low of Lower	Moderate of Higher	Above-Moderate of Higher	Lower-Income Units	Higher-Income Units	Very-Low Income	Low-Income	Moderate Income	Above-Moderate Income
Escalon	63%	37%	36%	64%	146	221	92	54	80	142
Lathrop	55%	45%	30%	70%	3,884	4,518	2,149	1,735	1,360	3,158
Lodi	60%	40%	32%	68%	1,533	2,377	916	617	753	1,623
Manteca	59%	41%	32%	68%	3,654	4,651	2,148	1,507	1,465	3,186
Ripon	55%	45%	31%	69%	565	859	311	254	263	596
Stockton	61%	39%	30%	70%	4,014	8,660	2,465	1,548	2,587	6,072
Tracy	53%	47%	37%	63%	4,873	3,957	2,567	2,306	1,454	2,504
Unincorp. / County	62%	38%	30%	70%	2,969	5,839	1,837	1,132	1,757	4,082

¹⁰ Specifically, we use the HCD Income Category Calculator to calculate incomes across the four categories based on the US Census Bureau’s ACS Table DP03 (5yr 2020).

The next step is to apply the component proportions to the Lower and Higher-Income Unit allocations and thereby determine the Draft Factor Adjusted RHNA Allocations by the four income categories. This is done in *Table 19: Components of RHNA Housing Unit Determination*. *Columns A through D* of *Table 19* reproduce the last four columns of *Table 18*. Those are then multiplied by the Lower-Income and Higher-Income unit allocations, reported in *Columns E and F* of *Table 19*, respectively. The result gives us the unit allocations across the four income categories. As such, *Column G* reports the allocation of Very-Low-Income units by multiplying *Column A* by *Column E*; *Column H* reports the allocation of Low-Income units by multiplying *Column B* by *Column E*; *Column I* reports the allocation of Moderate-Income units by multiplying *Column C* by *Column F*; and *Column J* reports the allocation of Above Moderate-Income units by multiplying *Column D* by *Column F*.

Table 20: San Joaquin County RHNA Housing Unit Determination by Detailed Income Categories

Jurisdiction	Total RHNA Allocation	Very-Low-Income Units	Low-Income Units	Lower-Income (Very-Low & Low-Income)	Moderate Income Units	Above-Moderate Income Units	Higher-Income (Moderate & Above-Moderate Income)
Escalon	367	92	54	146	80	142	221
Lathrop	8,402	2,149	1,735	3,884	1,360	3,158	4,518
Lodi	3,909	916	617	1,533	753	1,623	2,377
Manteca	8,306	2,148	1,507	3,654	1,465	3,186	4,651
Ripon	1,423	311	254	565	263	596	859
Stockton	12,673	2,465	1,548	4,014	2,587	6,072	8,660
Tracy	8,830	2,567	2,306	4,873	1,454	2,504	3,957
Unincorporated County Areas	8,808	1,837	1,132	2,969	1,757	4,082	5,839
Total San Joaquin County	52,719	12,484	9,153	21,637	9,719	21,363	31,082

Rearranging and integrating it with *Table 16*, *Table 20: San Joaquin County RHNA Housing Unit Determination by Detailed Income Categories* reports the Draft San Joaquin County RHNA housing unit determination by detailed income categories. While the Very-Low- and Low-Income categories together form a Lower Income unit need that often requires provision of multi-family units, and the Moderate and Above-Moderate Income categories together form a Higher Income unit need that typically requires provision of single-family units, *Table 20* details those component allocations using existing socio-economic distributions.

ATTACHMENT A: HCD Determination Letter

DRAFT

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 21, 2021

Diane Nguyen, Executive Director
San Joaquin Council of Governments
555 E Weber Avenue
Stockton, CA 95202-2804

Dear Executive Director Diane Nguyen:

RE: Final Regional Housing Need Determination

This letter provides the San Joaquin Council of Governments (SJCOG) 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 SJCOG's existing and projected housing need. In assessing SJCOG's regional housing need, HCD and SJCOG 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 **52,719** total units across four income categories. SJCOG 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 SJCOG's housing need, HCD considered all the information specified in state housing law (Government Code section 65584.01(c)).

SJCOG 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 SJCOG'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

Diane Nguyen, Executive Director
Page 2

(5) Affirmatively furthering fair housing

Pursuant to Government Code section 65584.04(d), to the extent data is available, SJCOC 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), SJCOC 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 SJCOC'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 SJCOC's leadership in fulfilling their important role in advancing the state's housing, transportation, and environmental goals. HCD looks forward to continued partnership with SJCOC and member jurisdictions and assisting SJCOC 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
SJCLOG: June 30, 2023 through December 31, 2031**

<u>Income Category</u>	<u>Percent</u>	<u>Housing Unit Need</u>
Very-Low*	25.2%	13,293
Low	15.8%	8,344
Moderate	17.5%	9,231
Above-Moderate	41.4%	21,851
Total	100.0%	52,719
* Extremely-Low	13.1%	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

SJCOG: 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 (SJCOG June 30, 2031 projection adjusted + 6 months to December 31, 2031)	893,920
2.	- <i>Group Quarters Population: December 31 (DOF June 30, 2031 projection adjusted + 6 months to December 31, 2031)</i>	19,150
3.	Household (HH) Population	874,770
4.	Projected Households	275,330
5.	+ Vacancy Adjustment (2.97%)	+8,177
6.	+ Overcrowding Adjustment (3.70%)	+10,186
7.	+ Replacement Adjustment (.5%)	+1,377
8.	- <i>Occupied Units (HHs) estimated June 30, 2023</i>	-246,666
9.	+ Cost Burden Adjustment	+4,315
Total	6th Cycle Regional Housing Need Assessment (RHNA)	52,719

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 SJCOG 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 (**2.03%**) is based on the 2015-2019 ACS data. For SJCOG, that difference is **2.97%**.
6. Overcrowding Adjustment: In counties where the overcrowding rate is greater than the comparable region's overcrowding rate, HCD applies an adjustment based on the amount the region's overcrowding rate exceeds the comparable region's overcrowding rate. For SJCOG, the region's overcrowding rate (**7.40%**) is higher than the comparable region's (3.70%), resulting in a **3.70%** 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 SJCOC, the 10-year average is **.39%**, 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 nation. The very low- and low-income RHNA is increased by the percent difference ($72.02\% - 60.25\% = \mathbf{11.78\%}$) between the region and the nation's 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 ($16.90\% - 9.89\% = \mathbf{7.01\%}$) between the region and the nation's 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.



ATTACHMENT B: RHNA Methodology Consistency Determination from HCD

DRAFT

**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 19, 2022

Diane Nguyen, Executive Director
San Joaquin Council of Governments
555 E Weber Avenue
Stockton, CA 95202-2804

Dear Diane Nguyen:

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

Thank you for submitting the draft San Joaquin Council of Government's (SJCOG) 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 52,719 units. The methodology then provides a base allocation to each jurisdiction based on its proportion of forecasted household growth between 2023 and 2031 in SJCOG's 2022 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). Next, each jurisdiction's allocation is split into lower income (very low and low) and higher income (moderate and above moderate) according to the distribution specified in the Final RHNA Determination. Lastly, the methodology uses three equally weighted factors to adjust the lower income RHNA for each jurisdiction:

- **Jobs/Housing Fit** – This factor allocates more lower income RHNA to jurisdictions with higher-than-average ratios of low-wage workers to affordable units according to 5-year ACS data and Longitudinal Employer-Household Dynamics (LEHD) data.
- **Regional Income Parity** – This factor allocates more lower income RHNA to jurisdictions with lower-than-average shares of lower income households according to Comprehensive Housing Affordability Strategy (CHAS) data provided by the U.S. Department of Housing and Urban Development (HUD).
- **Affirmatively Furthering Fair Housing** – This factor allocates more lower income RHNA to higher resourced jurisdictions based on TCAC/HCD Opportunity Map data.

HCD has completed its review of the methodology and finds that the draft SJCOG RHNA Methodology furthers the statutory objectives described in Government Code 65584(d).¹ SJCOG's draft methodology directs more RHNA into jurisdictions with higher incomes, resources, and rental costs, and jurisdictions with higher disparities between

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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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lower income jobs and affordable units. The draft methodology's income adjustments increase the number of lower income units going to higher income areas as a percentage of their total allocation. HCD commends SJCOG for including factors in the draft methodology linked to the statutory objectives such as a factor based on lower income jobs-housing fit and another based on the TCAC/HCD Opportunity Map.

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 total RHNA and lower income RHNA to jurisdictions with more higher income households. Jurisdictions with higher rents also receive more RHNA on a per household basis. Lastly, jurisdictions with higher home ownership rates and higher percentages of single-family homes receive slightly higher percentages 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 using the regional growth forecast to determine each jurisdiction's base allocation, as well as by including a lower income jobs-housing fit factor. Jurisdictions with access to more jobs via a 30-minute commute receive more RHNA per household. Jurisdictions with access to more jobs via a 45-minute transit commute and lower VMT also receive larger total RHNA allocations.

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

The draft methodology allocates the most total RHNA and lower income RHNA – relative to household share – to jurisdictions with lower income jobs-housing fit ratios over 4 (4 low-wage jobs for every affordable housing unit). Jurisdictions with lower income jobs-housing fit ratios between 1.5 and 2 also receive more total RHNA and lower income RHNA per household compared to jurisdictions with fit ratios below 1.5. Further, jurisdictions with the highest total jobs and housing imbalances receive the most total and lower income RHNA on a per household basis.

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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 43 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.

Jurisdictions with more access to opportunity receive larger total RHNA and lower income allocations on a per household basis. Further, jurisdictions with more low-resource and high-segregation/poverty areas receive smaller total RHNA and lower income allocations per household. More specifically, jurisdictions with at least 15 percent low-resource and high-segregation/poverty areas receive a share of RHNA that is, on average, 89 percent of their share of households, compared to 212 percent for other jurisdictions.

HCD appreciates the active role of SJCOG staff – particularly Kim Anderson and Christine Corrales – in providing data and input throughout the draft SJCOG RHNA methodology development and review period. HCD also thanks Thomas Pogue and Steven McCarty-Snead for their significant efforts and assistance.

HCD looks forward to continuing our partnership with SJCOG to help its member jurisdictions meet and exceed the planning and production of the region’s housing need. Support opportunities available for the SJCOG 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>.

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- 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).
- HCD also encourages all San Joaquin 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



ATTACHMENT C: Notices of Public Hearing

DRAFT

SAN JOAQUIN COUNCIL OF GOVERNMENTS
NOTICE OF 30-DAY PUBLIC COMMENT PERIOD AND PUBLIC HEARING
FOR THE
PROPOSED REGIONAL HOUSING NEEDS ALLOCATION (RHNA) METHODOLOGY

NOTICE IS HEREBY GIVEN that the San Joaquin Council of Governments (SJCOG), as the Council of Governments (COG) for the region, has released a Proposed Regional Housing Needs Allocation (RHNA) Methodology for the Sixth Cycle of the RHNA process as required by the State in order for local jurisdictions to prepare updated General Plan Housing Elements.

As part of the methodology development process, SJCOG is required to solicit feedback on the proposed RHNA methodology during a public comment period and public hearing.

A public comment period will commence on February 2, 2022, and conclude on March 4, 2022, at 4:00 pm.

During the public comment period, materials will be available on SJCOG's RHNA webpage: www.sjcog.org/RHNA, including a methodology framework document that describes the proposed methodology developed in consultation with the RHNA Ad Hoc Committee.

A public hearing will be held on Thursday, February 24, 2022, at approximately but no earlier than 4 pm, during SJCOG's regularly scheduled Policy Board meeting to solicit comments on the proposed RHNA Methodology.

In the interest of maintaining appropriate social distancing measures, members of the public may participate in the meeting electronically using the video conferencing software Zoom and shall have the right to observe and offer public comment in real-time during the meeting.

The following options are available to members of the public to listen to the Policy Board meeting and Public Hearing and provide comments to the Policy Board members during the meeting:

Option 1: To listen and speak, join the meeting from your computer or tablet using the following link:

<https://sjcog.zoom.us/j/87208968254>

To make a public comment during the Public Hearing, please use the "Raise Hand" icon in Zoom and you will be called on by the chair to speak.

Option 2: For participation by teleconference only, please use the following telephone number and access codes.



Call-in Number: +1-669-900-6833

Meeting ID: 872 0896 8254

To make a public comment during the Public Hearing, please press *9 on your telephone keypad to use the “Raise Hand” feature in Zoom and you will be called on by the chair to speak. To lower your hand, press *9 again.

Spanish-speaking interpreter available upon request at the hearing and other language support or reasonable Americans with Disabilities Act accommodations may be requested 72 hours in advance of the hearing.

Public comments can also be submitted during the public comment period commencing on February 2, 2022, and concluding on March 4, 2022, at 4:00 pm.

Written comments can be submitted to the SJCOG office via U.S. Mail at

555 E Weber Ave, Stockton, CA 95202

attention Christine Corrales, Senior Regional Planner, or via email at carranza@sjcog.org. Comments received by 4:00 p.m. on March 4, 2022, will be made a part of the record.

Contact Person:
Christine Corrales,
Senior Regional Planner
555 E. Weber Ave
Stockton, CA 95202
(209) 235-0128
corrales@sjcog.org



CONSEJO DE GOBIERNOS DE SAN JOAQUÍN
AVISO DE EL PERÍODO DE COMENTARIOS PÚBLICOS DE 30-DÍAS Y AUDIENCIA
PÚBLICA PARA LA METODOLOGÍA PROPUESTA DE ASIGNACIÓN DE
NECESIDADES DE VIVIENDA REGIONAL (RHNA)

POR ESTE MEDIO SE DA AVISO que el Consejo de Gobiernos de San Joaquín (SJCOC), como el Consejo de Gobiernos (COG) para la región, ha publicado una Metodología Propuesta de Asignación de Necesidades de Vivienda Regional (RHNA) para el Sexto Ciclo del proceso RHNA según lo requerido por el Estado para que las jurisdicciones locales se preparen para actualizar sus Elementos de Vivienda del Plan General.

Como parte del proceso de desarrollo de la metodología, se requiere que SJCOC solicite comentarios sobre la metodología propuesta de RHNA durante un período de comentario público y una audiencia pública.

El período de comentarios públicos comenzará el 2 de febrero de 2022 y concluirá el 4 de marzo de 2022 a las 4:00 p.m.

Durante el período de comentarios públicos, todo material esta disponible en la página web de RHNA de SJCOC: www.sjcog.org/RHNA, incluirá un documento de estructura de la metodología que describe el desarrollada de la metodología propuesta desarrollada con la asesoría el Comité Ad Hoc de RHNA.

Se llevará a cabo una audiencia pública el jueves 24 de febrero de 2022, aproximadamente pero no antes de las 4:00 p. m. durante la reunión regular de la Junta Normativa del SJCOC para solicitar comentarios sobre la Metodología RHNA propuesta.

Con el fin de mantener las medidas adecuadas de distanciamiento social, los miembros del público pueden participar en la reunión electrónicamente utilizando el software de videoconferencia de Zoom y durante la reunión tendrá derecho a observar y ofrecer comentarios públicos en tiempo real.

Las siguientes opciones están disponibles para que los miembros del público escuchen la reunión del consejo de políticas y la Audiencia Pública y proporcionen comentarios a los miembros de la política durante la reunión:

Opción 1: Para escuchar y hablar, únase a la reunión desde su computadora o tableta usando el siguiente enlace:

<https://sjcog.zoom.us/j/87208968254>

Para hacer un comentario público durante la Audiencia Pública, utilice el icono "Levantar la mano" en Zoom y el presidente le pedirá que hable.

Opción 2: Para participar solo por teleconferencia, utilice el siguiente número de teléfono y códigos de acceso.

Número de llamada: +1-669-900-6833

Identificación de la reunión: 872 0896 8254

Para hacer un comentario público durante la Audiencia Pública, presione *9 en el teclado de su teléfono para usar la función "Levantar la mano" en Zoom y el presidente le pedirá que hable. Para bajar la mano, presione *9 nuevamente.

Intérpretes que habla español están disponibles a petición para la Audiencia Pública, también se pueden solicitar 72 horas antes de la audiencia otros apoyos lingüísticos o adaptaciones razonables según la Ley de Acta de Americanos con Discapacidades.

Los comentarios públicos también se pueden enviar durante el período de comentarios públicos comenzando el 2 de febrero de 2022 y terminando el 4 de marzo de 2022 a las 4:00 p.m.

Los comentarios por escrito se pueden enviar a la oficina de SJCOG a través del correo a la dirección

555 E Weber Ave, Stockton, CA 95202

dirigido a Christine Corrales, Planificadora Regional Superior, o por correo electrónico a carranza@sjcog.org. Comentarios recibidos a las 4:00 p.m. el 4 de marzo de 2022, serán parte del récord.

Persona para contactar:
Christine Corrales,
Planificadora Regional Superior
555 E. Weber Ave
Stockton, CA 95202
(209) 235-0128
corrales@sjcog.org



DRAFT



ATTACHMENT D: Comments Received Regarding RHNA Methodology

DRAFT

i. SJCOC's Formal Response to California Rural Legal Assistance



SAN JOAQUIN COUNCIL OF GOVERNMENTS

555 E. Weber Avenue • Stockton, California 95202 • P 209.235.0600 • F 209.235.0438 • www.sjcog.org

March 16, 2022

California Rural Legal Assistance, Inc.
Nicholas Jensen
145 E. Weber Ave
Stockton, CA 95202

Leo Zuber

CHAIR

Robert Rickman

VICE CHAIR

Diane Nguyen

EXECUTIVE DIRECTOR

Member Agencies

CITIES OF
ESCALON,
LATHROP,
LODI,
MANTECA,
RIPON,
STOCKTON,
TRACY,
AND
THE COUNTY OF SAN
JOAQUIN

RE: Regional Housing Needs Allocation Public Comment.

Dear Nicholas Jensen:

Thank you for submitting your comment on the draft Regional Housing Needs Assessment (RHNA) methodology for San Joaquin County. We have carefully reviewed the comments and have responded accordingly.

How does the RTP/SCS forecast meet the RHNA objective of promoting infill development and socioeconomic equity?

There are a few ways that the RTP/SCS forecast supports and encourages infill and equity:

- The RTP/SCS forecast is aligned with the land-use projections developed in consultation with jurisdictions, ensuring consistency between housing elements and RHNA. Since the land-use projection for the RTP/SCS is developed based on goals and strategies that support infill and equity, efficient growth patterns, protection of the environment, and the forecast is consistent with the land-use projection, both support the RHNA objectives.
- The RTP/SCS forecast represents the most nuanced population growth projection available through its circular dependence on jurisdictions planning processes including policies that promote infill by preserving open space and natural resources.
- Also significant, we excluded rural areas in our Opportunity Areas adjustment factor to ensure promoting equitable infill development. This encourages infill development in more urban job centers, lessening the need for driving to get to destinations.
- While there were several choices to use as the base forecast for each jurisdiction for RHNA, the one chosen was the percentage share of growth anticipated during the RHNA period in each jurisdiction.

The development of the RTP/SCS has been ongoing for two years, so the RHNA has been developed alongside the RTP/SCS. The draft RTP will be released in the next couple of months and will be considered for adoption in the summer. The RHNA methodology will be finalized after the comment period closes this week and then sent to HCD for formal review. They have 60 days to review – after that, we will officially post the RHNA allocations for each jurisdiction and another review period will start. Depending on the number of appeals received (if any), the final RHNA plan may or may not be complete by the time the RTP is considered for adoption – but the processes are very much intertwined.

How do we know the population forecast effectively anticipates the infill & equity-based land use goals if the land use projections haven't been developed yet?

Land use projections and the population forecast are developed in an iterative process. Regional land use projections are developed as part of the RTP/SCS process. The current RTP/SCS from 2018 made land-use projections based on the forecast at that time (vintage 2016), and the RTP/SCS update that is currently under development has similarly made land-use projections utilizing the latest forecast that was utilized for the RHNA process (vintage 2020). It is a cyclical and interrelated process. By forecasting population, households, and employment, including demographic characteristics thereof, the forecast helps align and inform the development of the interrelated RHNA, RTP/SCS, and local planning efforts throughout San Joaquin County. Thus, the forecast is both informed by *and* informing strategies for meeting infill and equity-based land-use goals. Local area forecasts consider existing planning documents, as well as growth capacities in Municipal Service Reviews, and help inform future planning efforts (e.g., updates to General Plans and Housing Elements). In their Housing Elements, local jurisdictions must identify sites zoned to fully accommodate the RHNA (see Government Code § 65583(a)), which furthers the regional infill, efficient growth patterns, and GHG emission reduction targets supported by the RHNA, which is itself also reflected in the RTP/SCS. While local jurisdictions retain broad land-use authority, local jurisdictions that implement plans, programs, and projects in line with the policies and strategies of the RTP/SCS qualify for additional funding, incentives (e.g., CEQA streamlining), and resources.

The forecast is an informed prediction, which considers data, as well as policies and projects in planning documents and feedback from local jurisdictions. The forecast further supports equity and infill development, including GHG emission reduction targets, by informing the RTP/SCS and RHNA, which aims to focus housing units in areas of opportunity near projected job centers at costs affordable to a diversity of households. By utilizing a consistent baseline established by the forecast, the RHNA furthers infill development and equity goals on its own and through the RTP/SCS and local planning efforts aligned with a common baseline projection of growth—and these efforts also help inform subsequent forecasts.

Do all the county's jurisdictions have policies that sufficiently favor infill, efficient growth patterns, and meeting GHG emission reduction targets?

The RTP/SCS utilizes the forecast to help develop a long-range vision and investment plan to meet projected transportation needs in furtherance of economic, environmental, and public health goals. By using the same baseline growth projections as the RHNA, the policies and strategies of the RTP/SCS support a consistent level of growth and comprehensively plans for meeting the resultant housing needs in a way that contributes to the reduction in GHG emissions and that favors infill development and efficient growth patterns in an equitable way in each of San Joaquin County's jurisdictions. Like the forecast, the RTP/SCS, which is updated every four years, considers existing land use projections, and informs future land use projections in an iterative process directed toward the development of a sustainable community. The RTP/SCS also incorporates feedback from a variety of perspectives, including related to economic development, environmental preservation, air quality, public health, environmental justice, and farmland conversion/preservation, for example.

The RTP/SCS “identifies land use patterns that encourage infill development and compact development,” “makes provisions for new residential development growth that makes shifts from single-family development to more multi-family development,” “delivers a system to reduce vehicle miles traveled and peak hour traffic congestion,” increases public transit services accessible to all income levels, and “encourages new housing and jobs in urbanized areas to better integrate housing, land use, and transportation facilities” (p. 1-21; also see p. 3-2). Further, the RTP/SCS’s policy element considers “statutory housing goals and objectives,” including the RHNA, and identifies areas to accommodate long-term and more short-term housing needs in an equitable and sustainable way (p. 3-2; also see pp. 3 and 4 of the FAQ at <https://www.sjcog.org/DocumentCenter/View/3190/RTP-SCS-Plan-Factsheet>). RTP/SCS performance indicators help assess “the equitability of Plan investments across all income and minority groups in San Joaquin County,” “and the Plan provides for increased housing choices for all populations in San Joaquin County” (p. 5-11). For a more detailed description of how the RTP/SCS attempts to accomplish this, see the current RTP/SCS at <https://www.sjcog.org/278/Adopted-2018-RTPSCS> and the proposed 2022 list of policies and strategies at <https://www.sjcog.org/DocumentCenter/View/6056/Proposed-Policies-and-Strategies>.

Whereas the RTP/SCS utilizes the forecast to identify ways that land use development and transportation can meet GHG emission reduction targets set by the California Air Resources Board, the RHNA utilizes the forecast to help assess and allocate local housing needs identified by the California Department of Housing & Community Development. RHNA does not rely exclusively on the RTP/SCS to further the infill, sustainability, and equity objectives. The RHNA is required to meet five statutory objectives outlined in Government Code § 65584(d), which relate to 1) increasing the housing supply and mix of housing types, 2) promoting infill, equity, and the environment, 3) ensuring a jobs-housing balance and fit, 4) promoting regional income parity, and 5) affirmatively furthering fair housing. The RHNA aims to support these objectives through a variety of methods. For example, as outlined in more detail in the draft RHNA methodology at <https://www.sjcog.org/DocumentCenter/View/6803/San-Joaquin-6thRHNA-FrameworkReport-2021-12-22a>, the RHNA supports the second statutory objective mentioned above, “promoting infill, equity, and the environment,” through its Affirmatively Furthering Fair Housing Factor and Jobs-Housing Fit Factor adjustments. Further, as mentioned previously, the RHNA excluded rural areas in our Opportunity Areas adjustment factor to promote equitable and sustainable infill development in urban job centers, lessening the need for driving to get to destinations.

We thank you for your comment submission.

Sincerely,



Kim Anderson,
Deputy Director, Planning
San Joaquin Council of Governments

ii. Public Comment from Enterprise Community Partners on March 4, 2022



VIA EMAIL

March 4, 2022

ATTN: Christine Corrales
San Joaquin Council of Governments
555 E. Weber Ave.
Stockton, CA 95202

Dear Ms. Corrales,

Thank you for the opportunity to comment on the draft Regional Housing Needs Assessment (RHNA) methodology for San Joaquin County.

Enterprise Community Partners (Enterprise) is a national nonprofit that develops technical and capacity-building programs, advocates for policies, and delivers the capital to create and preserve affordable housing for low-income families. Since 2016, Enterprise has established itself as a leader in affordable housing programming and policy development across the San Joaquin Valley region. The following comments, questions, and recommendations to the draft RHNA methodology are informed by Enterprise's direct experience with affordable housing in San Joaquin County as well as our experience working with other regions on their own RHNA methodology development processes.

- Use the full SCS horizon growth projections period (2050) to determine the proportional distribution for the baseline allocations, instead of limiting the time period to 2031. The Regional Transportation Plan/Sustainable Community Strategy (RTP/SCS), Envision 2050, sets the long-term growth pattern for San Joaquin County through the year 2050. The upcoming RHNA cycle runs from 2023 to 2031. Enterprise recognizes that the draft methodology is seeking to ensure consistency between the regional household growth projections and RHNA, but we believe using the growth projections for the full term of Envision 2050 are the best option to inform the zoning and site selection required by this RHNA and housing element update cycle because they reflect the actual projected long-term household growth projections as laid out in the region's RTP/SCS. This is especially important given that the Envision 2050 growth projection from 2023-2031 (22,930) does not reflect the scale of the housing need for the region, as identified by the State through the SJCOG Regional Housing Needs Determination (RHND - 52,719), as outlined in Table 2. Enterprise also recognizes that realizing the final outcome of housing growth is a years-long process where the development community must identify sites, financing, move through

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lengthy entitlement and permit processes and eventually construct units. It is likely that parcels zoned within jurisdictions to accommodate current RHNA allocations may not start the actual development process or may not be completed to have new residents move in until after the upcoming cycle has ended in 2031. We therefore recommend that the draft methodology be updated to reflect Base Allocation 6 from Table 13 in Appendix B which utilizes RTP/SCS Household Growth from 2022 to 2050.

- Incorporate a Jobs-Proximity (both auto and transit) adjustment factor to actively further statutory Objective 2. Table 5 in the draft RHNA methodology indicates that the baseline RTP/SCS growth forecast is the adjustment factor used to support meeting statutory Objective 2: *Promoting infill development and socioeconomic equity, protecting environmental and agricultural resources, and encouraging efficient development patterns.* Enterprise is not clear on the direct connection between the RTP/SCS growth forecast and its relation to the goals of Objective 2. We recommend replacing the Jobs-Housing Fit adjustment factor with Jobs-Proximity data for both automobiles and transit. While factors like jobs-housing fit account for the relationship between available housing units affordable to low-income households and low-wage employment opportunities within a jurisdiction, it does not take into account actual proximity and access to these employment opportunities in relation to housing. In addition, many San Joaquin County residents travel between jurisdictions and outside the county for employment, which the jobs-housing fit indicator does not consider. Jobs-Proximity adjustment factors for automobiles and transit would help ensure that goals around infill housing, environmental protection and more efficient land-use patterns are accurately assessed by accounting more explicitly for vehicle miles traveled and transit access.
- Apply adjustment factors to high-income unit allocations. The draft RHNA methodology indicates that adjustment factors were applied only to low-income unit allocations. High-income unit allocations were then adjusted to ensure the total unit allocation per jurisdiction do not deviate from the baseline allocation. As noted above, the RHND is more than double what the RTP/SCS anticipates for household growth between 2023-2031, per Table 2 in the methodology document, and increasing the support of housing units at all income levels is important both for growing overall supply and also for achieving Affirmatively Furthering Fair Housing and climate goals (Objectives 2 and 5). The high-income unit allocation would particularly benefit from a Jobs-Proximity adjustment factor in order to ensure that curbing sprawling development patterns does not fall to low-income units alone. Enterprise recommends that adjustment factors be applied to both low and high-income unit allocations OR, after applying adjustment factors to low-income unit

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allocations, the high-income units be adjusted equally across jurisdictions to reflect the aggregate RHND, rather than jurisdiction-by-jurisdiction to return each jurisdiction's total allocation back to the baseline. If adjustments are being made, it is important that it impacts the jurisdiction's total allocation, not just their low-income allocation.

- Improve public participation. At the public hearing held February 24, 2022, to review the draft RHNA methodology, there was only one question submitted and there was no public response to this question (instead, staff noted they would follow up individually with the commenter). The public notice posted on SJCOG's website directs individuals to a required sign-in page to view the public-hearing notice. While there was a virtual workshop offered in January targeted to housing stakeholders, it is unclear whether the public was offered opportunity to inform the methodology development prior to the public hearing. Enterprise believes this process should be made more accessible to public input, following precedent established in other regions. We recommend that SJCOG hold an additional public hearing to review and respond to all feedback received during the comment period. We also recognize that public engagement will be critical to the next phase of this work – housing element updates. We recommend that SJCOG require that if jurisdictions are using REAP 1.0 funding to assist with housing element development that they include a robust public engagement process as a condition of securing funding.

We thank you for your willingness to consider these comments and suggestions and welcome the opportunity to discuss them in greater detail or answer any additional questions.

Sincerely,

Kristine Williams

Kristine Williams
Program Director
Enterprise Community Partners

Cc:

Justine Marcus, State and Local Policy Director
Brenda Amboy, Program Officer

Enterprise Community Partners

101 Montgomery Street, Suite 1350, San Francisco, CA 94104 | 415.395.9405 | enterprisecommunity.org

VIA EMAIL



iii: SJCOC’s Formal Response to Enterprise Community Partners



SAN JOAQUIN COUNCIL OF GOVERNMENTS

555 E. Weber Avenue • Stockton, California 95202 • P 209.235.0600 • F 209.235.0438 • www.sjcog.org

March 16, 2022

Enterprise Community Partners
Kristine Williams, Program Director
101 Montgomery Street
Suite 1350
San Francisco, CA 94104

Leo Zuber

CHAIR

Robert Rickman

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Diane Nguyen

EXECUTIVE DIRECTOR

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AND
THE COUNTY OF SAN
JOAQUIN

RE: Regional Housing Needs Allocation Public Comment.

Dear Kristine Williams:

Thank you for submitting your comment on the draft Regional Housing Needs Assessment (RHNA) methodology for San Joaquin County. We have carefully reviewed the comments and have responded accordingly.

Use the full SCS horizon growth projections period (2050) to determine the proportional distribution for the baseline allocations, instead of limiting the period to 2031.

- We appreciate the suggestion regarding the use of the alternative time horizon through 2050 (Base Allocation 6). We carefully considered that option; however, when we analyzed the impact on the five statutory RHNA objectives, we found that using Base Allocation 6 dropped our performance in supporting Objective 2 (promoting infill, equity, and the environment). While Base Allocation 6 does marginally improve our impact across most measures in terms of the other objectives, Base Allocation 4 also promotes those objectives without undermining performance in Objective 2. This situation is created because as we look to the longer time horizon (Base Allocation 6) comparatively more growth is forecast to occur in the south of the county in communities like Lathrop, Manteca, and Tracy where infill and transit options are less extensive. As a result, switching from Base Allocation 4 puts more growth in areas that undermine Objective 2.

Incorporate a Jobs-Proximity (both auto and transit) adjustment factor to actively further statutory Objective 2.

1) In terms of the connection between the RTP/SCS growth forecast and the goals of Objective 2:

- Regional land use projections are developed as part of the RTP/SCS process. The current RTP/SCS from 2018 made land-use projections based on the forecast at that time, and the RTP/SCS update that is currently under development will similarly make land-use projections utilizing the latest forecast utilized by the RHNA. It is a cyclical and interrelated process. By forecasting population, households, and employment, including demographic characteristics thereof, the forecast helps align and inform the development of the interrelated RHNA, RTP/SCS, and local planning efforts throughout San Joaquin County. Thus, the forecast is both informed by and informing strategies for meeting infill



and equity-based land-use goals. Local area forecasts consider existing planning documents, as well as growth capacities in Municipal Service Reviews, and help inform future planning efforts (e.g., updates to General Plans and Housing Elements).

- In their Housing Elements, local jurisdictions must identify sites zoned to fully accommodate the RHNA (see Government Code § 65583(a)), which furthers the regional infill, efficient growth patterns, and GHG emission reduction targets supported by the RHNA, which is itself also reflected in the RTP/SCS. While local jurisdictions retain broad land-use authority, local jurisdictions that implement plans, programs, and projects in line with the policies and strategies of the RTP/SCS qualify for additional funding, incentives (e.g., CEQA streamlining), and resources.
- The forecast is an informed prediction, which considers data, as well as policies and projects in planning documents and feedback from local jurisdictions. The forecast further supports equity and infill development, including GHG emission reduction targets, by informing the RTP/SCS and RHNA, which aims to focus housing units in areas of opportunity near projected job centers at costs affordable to a diversity of households. By utilizing a consistent baseline established by the forecast, the RHNA furthers infill development and equity goals on its own and through the RTP/SCS and local planning efforts aligned with a common baseline projection of growth—and these efforts also help inform subsequent forecasts.
- The RTP/SCS utilizes the forecast to help develop a long-range vision and investment plan to meet projected transportation needs in furtherance of economic, environmental, and public health goals. By using the same baseline growth projections as the RHNA, the policies and strategies of the RTP/SCS support a consistent level of growth and comprehensively plans for meeting the resultant housing needs in a way that contributes to the reduction in GHG emissions and that favors infill development and efficient growth patterns in an equitable way in each of San Joaquin County’s jurisdictions. Like the forecast, the RTP/SCS, which is updated every four years, considers existing land-use projections and also informs future land-use projections in an iterative process directed toward the development of a sustainable community. The RTP/SCS also incorporates feedback from a variety of perspectives, including related to economic development, environmental preservation, air quality, public health, environmental justice, and farmland conversion/preservation, for example.
- The [RTP/SCS](#) “identifies land use patterns that encourage infill development and compact development,” “makes provisions for new residential development growth that makes shifts from single-family development to more multi-family development,” “delivers a system to reduce vehicle miles traveled and peak hour traffic congestion,” increases public transit services accessible to all income levels, and “encourages new housing and jobs in urbanized areas to better integrate housing, land use, and transportation facilities” (p. 1-21; also see p. 3-2). Further, the RTP/SCS’s policy element considers “statutory housing goals and objectives,” including the RHNA, and identifies areas to accommodate long-term and more short-term housing needs in an equitable and sustainable way (p. 3-2 of the [RTP/SCS](#); also see pp. 3 and 4 of the FAQ at <https://www.sjco.org/DocumentCenter/View/3190/RTP-SCS-Plan-Factsheet>).



In terms of replacing the Jobs-Housing Fit adjustment factor with Jobs-Proximity data for both automobiles and transit to promote Objective 2:

- Inclusion of the Jobs-Housing Fit adjustment factor is done because of the need to ensure Objective 3, promoting an improved intraregional relationship between jobs and housing, especially considering the number of affordable housing units to low-wage workers in each jurisdiction. The point that you make about the need for affordable housing near the site of low wage work is precisely why the Jobs-Housing Fit adjustment factor is being used as it shows a need for affordable housing in the jurisdictions in the south of the county where lower paid jobs are growing rapidly but there is limited affordable housing. It is important that Objective 3 not be discounted and that we promote a RHNA allocation proportional to the jurisdiction's share of jobs as well as ensure that the share of lower-income RHNA is proportional to the jurisdiction's share of low-wage jobs. Both components are furthered under the current methodology with the explicit Jobs-Housing Fit adjustment factor promoting Objective 3. Given the growth of low-wage jobs in the southern portion of San Joaquin County, removing the Jobs-Housing Fit adjustment factor and replacing it with Jobs-Proximity data will reduce the methodology's support and promotion of Objective 3 and may also have negative impacts on Objectives 1, 4 and 5.

Apply adjustment factors to high-income unit allocations

- The current methodology does adjust both the high-income and low-income unit allocations. Given that each jurisdiction has a set number of total housing units, allocation of additional low-income units reduces that allocation of high-income units and vice versa. There is no connection between the scale of the RTP/SCS forecast and the adequacy of the RHNA allocation as it is the growth rate from the RTP/SCS that determines the share of total RHNA a jurisdiction receives. All adjustments are being made to both allocations, but the mechanism is on the lower RHNA allocation as the first step in the process. For instance, Stockton had an initial allocation of 7,472 higher income units but that allocation increased to 8,660 after the adjustment factors were applied. Similarly, Tracy had an initial allocation of 5,206 higher income units; however, after the adjustment factors were applied, that allocation decreased to 3,957.

Public Participation

We appreciate the opportunity to consider improving the process for the future, including with an additional public hearing and with linking REAP funding with an enhanced public engagement process. Regarding state law and public participation requirements for the Regional Housing Needs Allocation (RHNA), Government Code § 65584.04(d) states the following:

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. [Protected classes include "race, color, religion, sex, gender, gender identity, gender expression, sexual orientation, marital status, national origin, ancestry, familial status, source of income, disability, veteran or military status, or genetic information of that person."] 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 (c) 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.

SJCOC convened an ad hoc RHNA technical working group, which met four times between February 2021 and December 2021. RHNA related staff reports were presented to SJCOC's standing committees and policy board in the months of January, June, and October 2021, as well as January and February 2022. On January 12, 2022, the San Joaquin Council of Governments (SJCOC) hosted a RHNA Cycle 6 virtual workshop for San Joaquin County housing stakeholders. In accordance with state law, a public comment period opened on February 2, 2022, and closed on March 4, 2022. SJCOC hosted a Regional Housing Symposium on 2/23 and 2/24, which was another opportunity for outreach and public participation. And, in addition to the aforementioned workshop, committee meetings, and symposium, a public hearing took place on February 24, 2022, at the regular SJCOC.

SJCOC provided public notice in English and Spanish online on the SJCOC RHNA webpage at <https://www.sjcog.org/113/Regional-Housing-Needs-Allocation>, on the SJCOC Press Releases, Hearings, & Public Notices webpage at <https://www.sjcog.org/270/Press-Releases-Hearings-Public-Notices>, and via email to over 230 interested parties who signed up at <https://www.sjcog.org/126/4299/Public-Information> to receive email notifications. (While the PDF of the public notice required registration to access via the SJCOC RHNA webpage, the dates of the public comment period and public hearing were visible directly on that webpage and the public notice was also available for download in English and Spanish without registration on the SJCOC Press Releases, Hearings, & Public Notices webpage.) The Draft RHNA Methodology Framework Report was posted online at the SJCOC RHNA website in advance of the public comment period. The SJCOC RHNA website listed contact information for a CivicSpark Fellow and the Senior Regional Planner assigned to this process. Members of the public were invited to submit comments at the public hearing, as well as via mail and email during the public comment period. The aforementioned process exceeds legal requirements and attempts to facilitate an inclusive engagement of all interested stakeholders.

We thank you for your comment submission.

Sincerely,

Kim Anderson,
Deputy Director, Planning
San Joaquin Council of Governments



ATTACHMENT E: Report on the Jurisdictional Survey of the Housing Environment

DRAFT



San Joaquin Council of Governments Jurisdictional Survey of the Housing Environment: 2023-2031 Regional Housing Needs Allocation – Cycle 6

Administrative Draft

2 March 2022

Prepared by:

Center for Business and Policy Research
University of the Pacific
Stockton and Sacramento, California



Prepared for:

San Joaquin Council of Governments
Stockton, California



Page 1 of 25



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Glossary of Acronyms

CEQA	California Environmental Quality Act
COG	Council of Governments
HUD	U.S. Department of Housing and Urban Development
RHNA	Regional Housing Needs Allocation
RHNA Plan	Regional Housing Needs Allocation Plan
VMT	Vehicle Miles Travelled



RHNA Member Jurisdiction Survey Results

California Government Code requires that each Council of Government survey its member jurisdictions for information to inform development of the RHNA Methodology and Plan. The survey utilized for this study [hereafter referred to as the Survey¹] contained a series of forty-one questions intended to gather information related to five Objectives and fifteen Factors required for consideration. For reference, Government Code § 65584(d) specifies the following five Objectives all RHNA Plans must further:

1. **Housing Affordability, Equity, Supply, and Mix:** Increase housing supply and mix of housing types, with the goal of improving housing affordability and equity in all cities and counties within the region.
2. **Environmental Justice and Sustainability:** Promote infill development and socioeconomic equity; protect environmental and agricultural resources; encourage efficient development patterns; and achieve greenhouse gas reduction targets.
3. **Jobs-to-Housing Balance:** Improve intra-regional jobs-to-housing relationship, including the balance between low-wage jobs and affordable housing units for low-wage workers in each jurisdiction.
4. **Mixed-Income Communities:** Balance disproportionate household income distributions (more high-income allocation to lower-income areas, and vice versa).
5. **Fair Housing and Inclusivity:** Affirmatively further fair housing to promote fair housing choice and foster inclusive communities that are free from discrimination.

Further, Government Code §65584.04(e) identifies many additional Factors to be considered when developing the RHNA methodology, including the following fifteen:

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. Policies to preserve or protect land from urban development.
6. Opportunities to maximize use of transit and existing transportation infrastructure.
7. Policies directing growth toward incorporated areas.
8. Existing or projected loss of units contained in affordable housing developments.
9. High housing cost burdens.
10. The rate of overcrowding.
11. Housing needs of farmworkers.
12. Housing needs generated by a university within the jurisdiction.
13. Housing needs of individuals and families experiencing homelessness.
14. Units lost during a state of emergency that have yet to be replaced.
15. The region's SB 375 Greenhouse Gas Reduction Targets.

In order to effectively inform the development of the RHNA Plan, the Survey questions elicit information regarding actions, issues, and strategies that correspond to the abovementioned Objectives and Factors. Responses to the Survey not only help fulfill legal requirements, they also

¹ See Appendix for individual responses to the Survey.



enhance the ability to effectively identify and address barriers that negatively impact progress toward achievement of California’s housing goals. Indeed, the responses provide information to help make informed decisions to improve environmental sustainability, the character and quality of the community, people’s lives, and the realization of principles of fair housing, diversity, equity, inclusivity, and justice.

Responses

The Survey was distributed electronically to each of the seven members of San Joaquin Council of Governments [hereafter SJ COG] in July 2021. All seven members of SJ COG responded to the Survey between August and November 2021:²

1. City of Lodi
2. City of Stockton
3. City of Tracy
4. City of Ripon
5. City of Lathrop
6. City of Manteca
7. San Joaquin County

Key Findings

Overall, the Survey highlighted a significant concern for the balance of low-wage workers to affordable homes in the region. Demonstrating the importance of affordable housing for economic development, one of the most commonly cited impact of a shortage of affordable housing consisted of making it difficult for local employers to hire and/or retain workers. Beyond economic development, most jurisdictions also realized negative impacts of longer commute times and high-cost burdens for residents, which decreases the time and money available to support the local economy as well. The majority of responding jurisdictions (four of seven) use such data to inform policy decisions.

In terms of constraints, jurisdictions often cite construction costs and infrastructure limits, such as water and sewer, along with lack of suitable land available for development, as inhibiting the development of affordable housing. The responses demonstrate the significance of the availability of funding, land, and water, and the potential for jurisdictions to develop programs to respond to the constraints and opportunities identified in each jurisdiction.

Most jurisdictions (four of seven) consider the impacts of costs and overcrowding on residents. While there does not appear to be a housing need due to postsecondary educational institutions, two jurisdictions recognized a need for more farmworker housing.

Most jurisdictions (five out of seven) do not have an Analysis of Impediments to Fair Housing Choice or an Assessment of Fair Housing as required by the U.S. Department of Housing and



Urban Development (HUD) in some circumstances. Only one responding jurisdiction currently has an environmental justice/social equity element while two are in the process of adding these considerations to each chapter of their general plans. Most jurisdictions utilize data collected by community organizations, publicly available datasets, and local data sources to assess fair housing issues.

A majority of responding jurisdictions cite infrastructure needs and construction costs as significant impediments to the construction of a variety of types of affordable housing. Seventy-one percent of jurisdictions assessed that they were “somewhat successful” in achieving goals for overcoming historical patterns of segregation or removing barriers to equal housing opportunity through their past actions.

Summary of Results

This section considers the responses to each of the substantive questions in the seven-section, forty-one question Survey.

Jobs and Housing

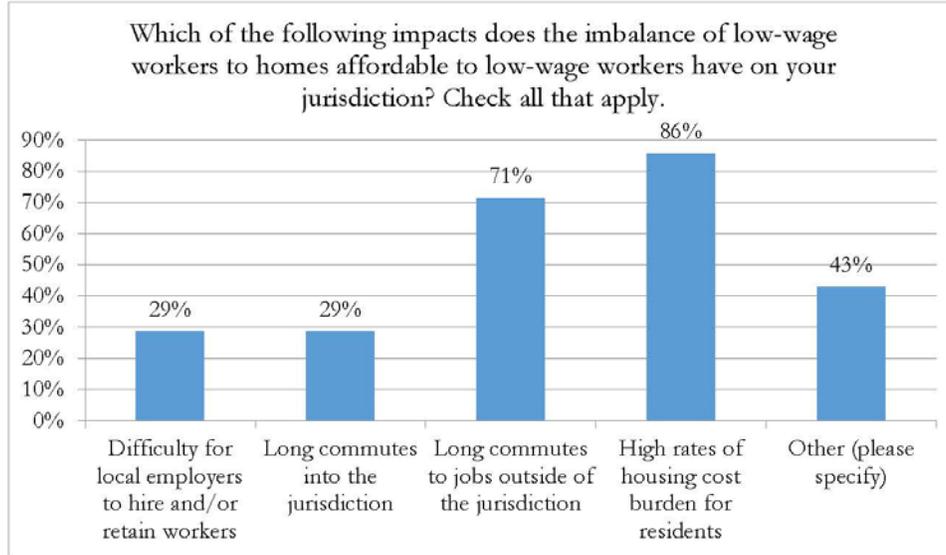
The first section of the Survey, which included the first seven questions, focused on jobs and housing. Whereas the first two questions of the survey sought to gather information about the respondents, the third question assessed whether the jurisdiction’s Jobs-Housing Fit Ratio, which measures the number of lower-wage jobs (jobs with earnings less than \$3,333/month) to affordable housing units (units with rent less than \$1,000/month), matched the jurisdictions perceptions. Fifty-seven percent (four of seven respondents to this question) indicated that the Jobs-Housing Fit Ratio matched the jurisdiction’s perceptions.

Following up on the third question related to the Jobs-Housing Fit Ratio, the fourth question asked, “What would you say are the primary reasons for the imbalance in your jurisdiction’s jobs-housing fit ratio?” Forty-three percent of respondents (three of seven) indicated that housing trends in the Bay Area were driving the imbalance in their jurisdiction’s jobs-housing fit ratio.

Continuing the analysis of the jurisdictions’ Jobs-Housing Fit Ratio, question five asked jurisdictions to analyze the impacts of the imbalance of low wage workers to homes affordable to low wage workers in their jurisdiction. Eighty-six percent (six of seven) of jurisdictions responded that residents in their jurisdiction faced high rates of housing cost burden as a result of the ratio. Seventy-one percent (five of seven) of jurisdictions reported long commutes to jobs outside the jurisdiction as a result of the Jobs Housing Fit ratio. Forty-three percent (three of seven) of the jurisdictions responded that the Jobs-Housing Fit Ratio in their jurisdiction made it difficult for local employers to hire and/or retain workers. Twenty-nine percent (two of seven) of the jurisdictions reported long commutes into the jurisdiction as a result of the Jobs Housing Fit ratio.

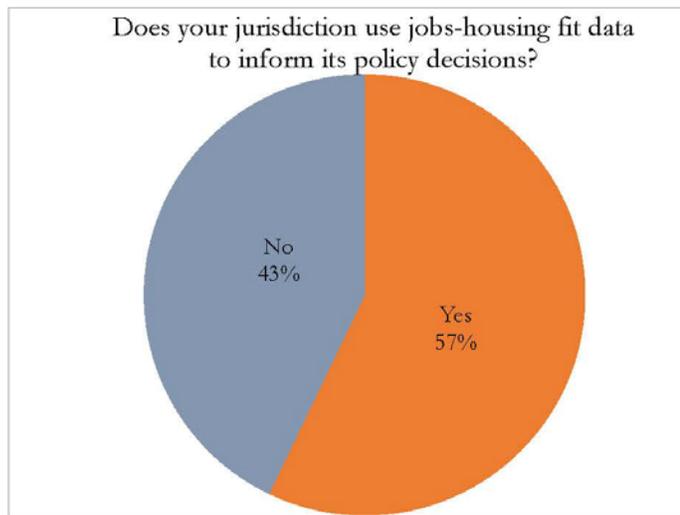


Figure 1: Impact of Balance Between Low-Wage Jobs and Affordable Housing



Continuing the analysis of the jurisdictions’ Jobs-Housing Fit Ratio, question six asked if jurisdictions used jobs housing fit data to inform policy decisions. Fifty-seven percent (four of seven) of jurisdictions surveyed used jobs-housing data to inform policy.

Figure 2: Use of Jobs-Housing Fit Data to Inform Policy Decisions





Question seven asked, given the jurisdiction's jobs-housing fit imbalance for low wage workers, which public policies, programs or strategies would be helpful for addressing the imbalance. Eighty-six percent of the jurisdictions (six out of seven) responded that increased funding for affordable housing would help address the jobs-housing fit imbalance. Fifty seven percent of the jurisdictions (four of seven) responded that inclusionary zoning would help address the jobs-housing fit imbalance. Three of seven jurisdictions responded that increased housing density would help address the jobs-housing fit imbalance. Three of seven jurisdictions also responded that community land trusts would help address the jobs-housing fit imbalance.

Housing Opportunities and Constraints

The second section of the Survey, which consisted of questions eight through twelve, focused on housing opportunities and constraints. Question eight asked jurisdictions to identify the constraints and opportunities for the development of additional housing by 2031 in the jurisdiction. Overall, the greatest opportunities recognized by the jurisdictions consist of the availability of parks, the availability of vacant land, the availability of water suitable for consumption and the availability of suitable land. Each of these factors were viewed as opportunities by 43% to 57% of respondents (3-4 jurisdictions). The greatest constraints recognized by the jurisdictions were financing/funding for affordable housing, sewer capacity, and state requirements to reduce vehicle miles traveled, which were cited as constraints by 57% of jurisdictions (four out of seven). 43% of jurisdictions identified construction workforce, cost of construction, availability of water suitable for consumption, county policies to preserve agricultural land, the impacts of climate change and natural disasters, and utility connection fees as constraints on the development of additional housing by 2031. At least 43% of jurisdictions identified availability of public or social services, availability of schools, impact of climate change, lands protected by federal or state programs, project labor agreements, state requirements to reduce vehicle miles traveled, and weak market conditions as both an opportunity and a constraint on the development of additional housing by 2031.

Question nine asked respondents which of the characteristics of their jurisdiction marked as opportunities in question eight represented the greatest opportunities for adding additional housing by 2031 within their jurisdiction. The jurisdictions selected the following opportunities:

1. Land availability, including public, suitable, or vacant land (four of seven respondents selected this)
2. Financing/funding for affordable housing (two of seven respondents selected this)
3. Availability of schools (one of seven respondents selected this)
4. Availability of parks and recreation programs (one of seven respondents selected this)
5. Availability of social services (one of seven respondents selected this)

Similarly, when asked to identify the three greatest constraints for the development of additional housing by 2031 in question ten, the jurisdictions selected the following eight constraints:

1. Sewer and/or water capacity limits (three of seven respondents selected this)
2. Availability of funding for affordable housing (two of seven respondents selected this)
3. Construction costs (two of seven respondents selected this)



4. State requirements to reduce VMT (two of seven respondents selected this)
5. Land protected by government programs (one of seven respondents selected this)
6. Availability of suitable land (one of seven respondents selected this)
7. Availability of schools (one of seven respondents selected this)

The responses demonstrate the significance of the availability of funding, land, and water.

Figure 3: Housing Development Constraints and Opportunities

Which of the following apply to your jurisdiction as an opportunity and/or a constraint for development of additional housing by 2031?				
	Opportunity	Constraint	Both	Total
Availability of construction workforce	13%	63%	25%	8
Availability of parks	63%	38%	0%	8
Availability of public or social services	22%	67%	11%	9
Availability of schools	75%	13%	13%	8
Availability of surplus public land	14%	71%	14%	7
Availability of vacant land	60%	10%	30%	10
Availability of water suitable for consumption	44%	44%	11%	9
Construction costs	0%	100%	0%	10
County policies to preserve agricultural land	40%	40%	20%	5
Financing/funding for affordable housing	40%	60%	0%	10
Impact of climate change and natural hazards	33%	67%	0%	6
Lands protected by federal or State programs	0%	57%	43%	7
Project labor agreements	0%	67%	33%	6
Sewer Capacity	56%	44%	0%	9
State requirements to reduce VMT	20%	50%	30%	10
Suitable land availability	56%	33%	11%	9
Utility connection fees	29%	29%	43%	7
Weak market conditions	14%	57%	29%	7

Four of the seven respondents to question eight wrote in additional constraints. The additional constraints include continued availability of state and federal funding, unpredictability and inconsistency of new legislation, market effects of Bay Area housing prices, a need for builder liability reform for condominiums and townhouses, and higher developer return on investment in other jurisdictions.

Question eleven asked jurisdictions to identify the primary obstacles to meeting affordable housing goals. The greatest obstacles include community opposition (fifty-seven percent), federal and state funding availability (seventy-one percent), lack of requisite infrastructure such as sewer and water (twenty-eight percent), local gap financing for affordable housing (fifty-seven percent), and local affordable housing development capacity (twenty-eight percent). Two jurisdictions provided additional responses, which listed development agreements and lack of financial incentives for developers and builders as additional obstacles in their jurisdiction.



Figure 4: Primary Affordable Housing Barriers

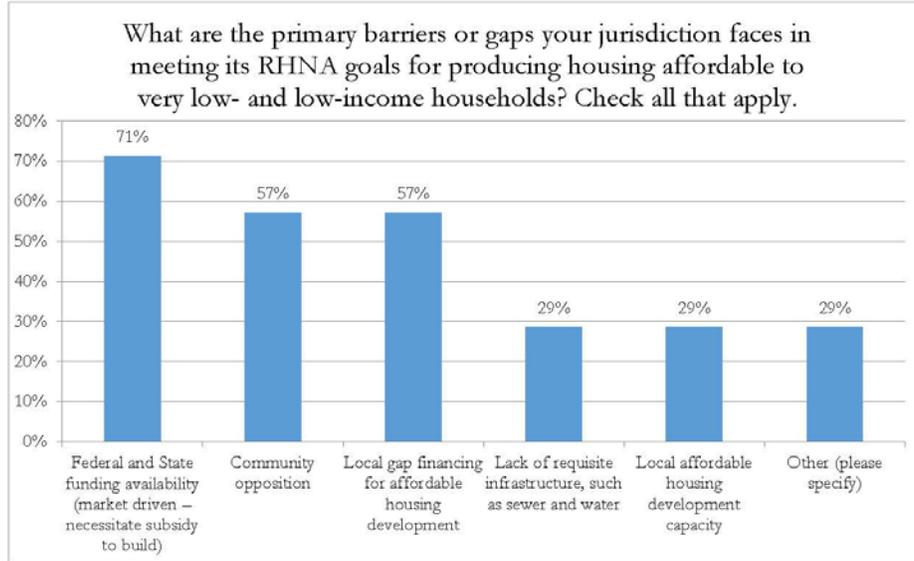
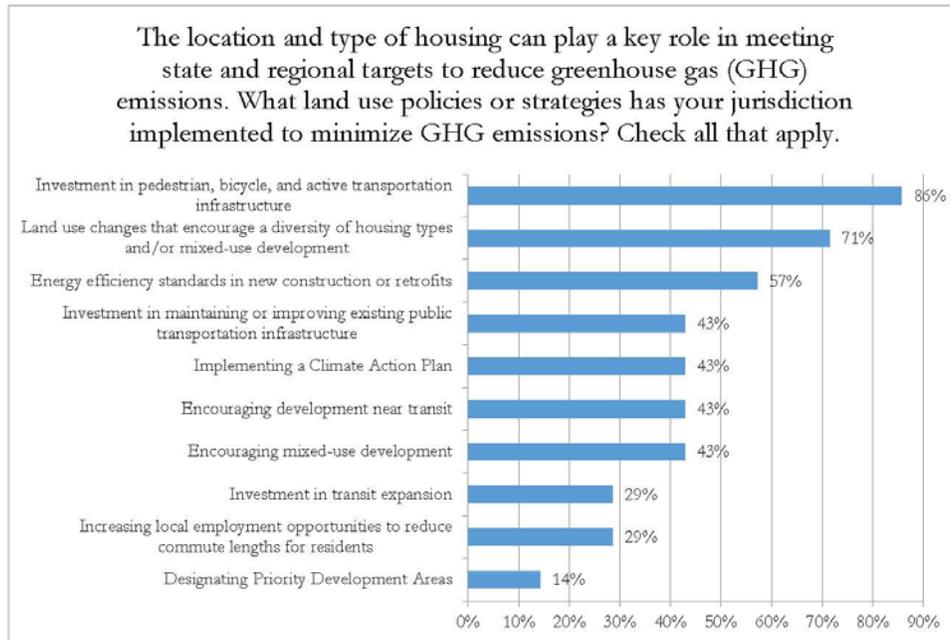


Figure 5: Greenhouse gas emission reduction policies and strategies





The final question in the section of the survey related to housing opportunities and constraints, question twelve, asked jurisdictions to identify what land use policies or strategies they have implemented to reduce greenhouse gas emissions.

The most utilized strategies include land use changes that encourage a diversity of housing types and/or mixed-use development (utilized by five of seven jurisdictions), as well as investment in pedestrian, bicycle, and active transportation infrastructure (utilized by six of seven jurisdictions). Fifty-seven percent (four of seven) of the jurisdictions responding to this question indicated that they utilized the strategy of implementing energy efficiency standards in new construction or retrofits. Forty-three percent (three of seven) of the jurisdictions selected encouraging mixed use development, developing a climate plan, investment in maintaining and improving current transportation infrastructure and encouraging development near transit as strategies implemented to limit greenhouse gas emissions. Twenty-nine percent (two of seven) of jurisdictions selected investment in transit expansion, and one jurisdiction selected designating priority development areas as strategies implemented to reduce greenhouse gas emissions.

Housing Affordability and Overcrowding

The third section of the Survey, which included questions thirteen and fourteen, focused on issues of housing affordability and overcrowding in the jurisdictions. Question thirteen presented information on the percentage of cost-burdened households in each jurisdiction and asked the jurisdictions to explain whether they considered the impacts of high housing costs, including mortgage, rents, and other costs associated with housing (e.g., utilities, taxes, insurance), and proportions of cost-burdened households. Four jurisdictions responded “yes”, one said, “don’t know”, one jurisdiction responded, “when housing costs are high and residents become rent burdened there are many potential impacts on families and communities,” and one jurisdiction did not provide a response.

The second and final question in this section, question fourteen, presented information regarding “overcrowded” households in each jurisdiction, and it asked the jurisdictions to explain whether they considered the impacts of overcrowding on residents in the jurisdiction. Five jurisdictions considered the impacts of overcrowding, one jurisdiction did not consider overcrowding impacts, one jurisdiction didn’t know if overcrowding impacts were considered and one jurisdiction provided no response.

The City of Stockton mentioned that “there are multiple reasons for overcrowding, we are trying to address these.” Further, the City of Lodi responded that “The increase of ADU & Jr. ADU’s are further adding to this concern. [We are] working on policy to insure better diversity to minimize crowding.”

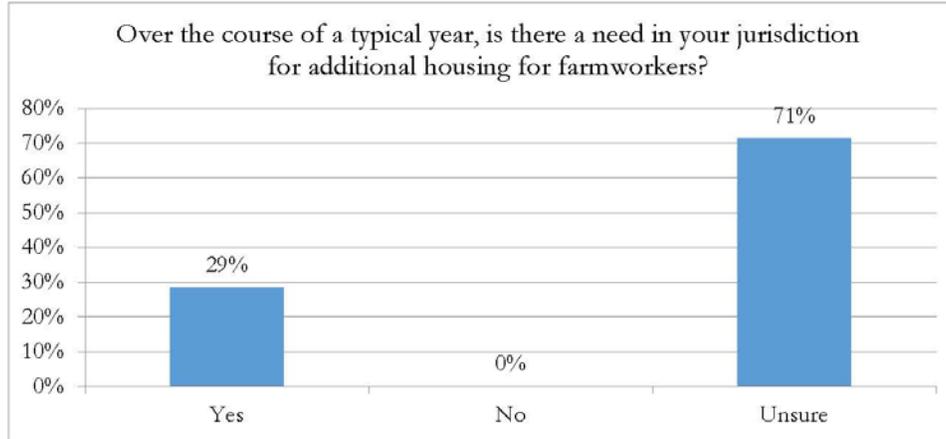
Housing Demand

The fourth section of the Survey, which included questions fifteen through twenty-four, focused on issues related to housing demand in each jurisdiction. Question fifteen asked whether jurisdictions recognized a need for additional farmworker housing. Whereas two respondents (twenty-nine



percent) recognized a need for additional farmworker housing over the next year, five respondents (seventy-one percent) were unsure.

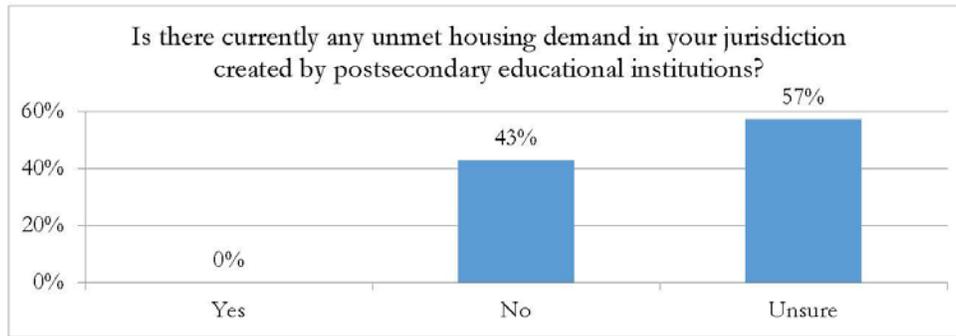
Figure 6: Recognized Need for Farmworker Housing



Question sixteen, which only applied to jurisdictions that recognized a need for additional farmworker housing, asked what the main reasons were for the unmet demand. One jurisdiction identified the current costs of development as the reason for the unmet demand.

Question seventeen asked jurisdictions to consider whether any currently unmet housing need resulted from postsecondary educational institutions. Three jurisdictions (forty-three percent) responded “no” and four jurisdictions (fifty-seven percent) responded “unsure”.

Figure 7: Recognized Postsecondary Educational Institutions’ Housing Needs

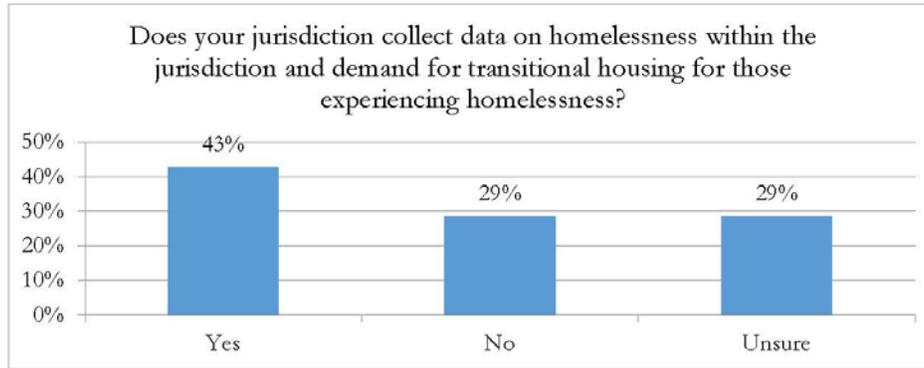


Question eighteen asked respondents that recognized a currently unmet housing need from postsecondary educational institutions to explain the main reasons of the unmet demand. Since none of the jurisdictions recognized any such need, question eighteen did not apply.



Question nineteen asked jurisdictions about whether they collect data on homelessness and demand for transitional housing. Of the seven responding jurisdictions, three collected such data, two did not, and two were unsure.

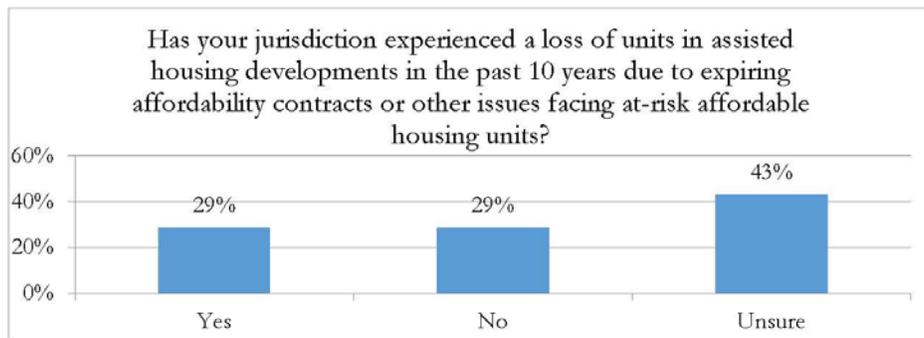
Figure 8: Collection of Data on Homelessness and Transitional Housing Need



Question twenty asked jurisdictions to provide an estimate for the local homeless population and corresponding need for transitional housing if the jurisdiction collected such data. The City of Manteca responded that they had “218+” members of the homeless population. Tracy reported that 155 homeless individuals were identified in the jurisdiction during the latest San Joaquin Continuum of Care count. Finally, the City of Lodi responded that there were around 200 homeless individuals in the jurisdiction.

Question twenty-one asked jurisdictions to indicate whether or not they experienced any loss of units in assisted housing developments in the prior decade as a result of issues facing at-risk affordable housing units. Three of seven responding jurisdictions mentioned that they were unsure whether they had experienced a loss in units in assisted housing developments, two responded that they have not experienced such a loss, and the other two stated that they had lost units.

Figure 9: Experience of Loss of Assisted Housing Developments in Prior Decade

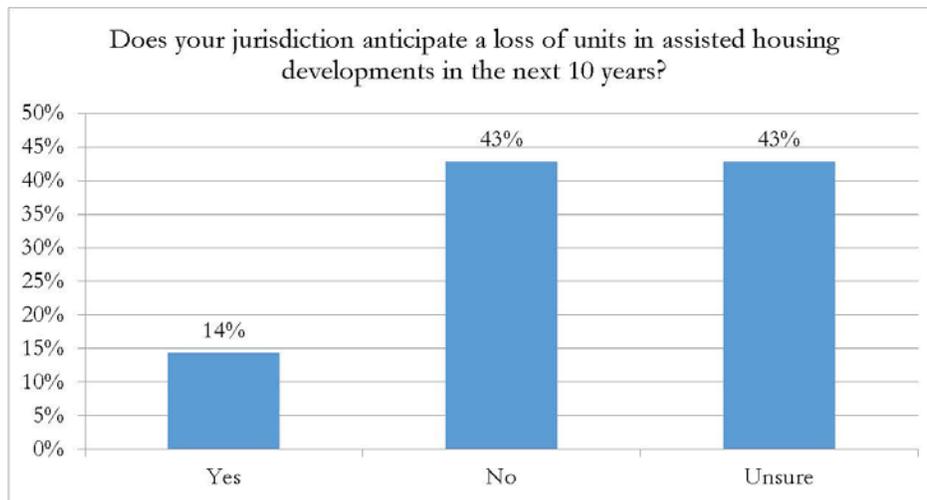




Question twenty-two asked jurisdictions that experienced a loss of units in assisted housing developments in the prior decade to estimate how many such units were lost. The city of Tracy responded that approximately sixty units in one apartment complex were lost. The city of Ripon provided an estimate of 40 units lost.

Question twenty-three asked jurisdictions to indicate whether they anticipate any loss of assisted housing development units in the next decade. Three of seven responding jurisdictions mentioned that they do not anticipate such a loss, one does anticipate a loss, and three were unsure.

Figure 10: Anticipated Loss of Assisted Housing Development Units in Next Decade



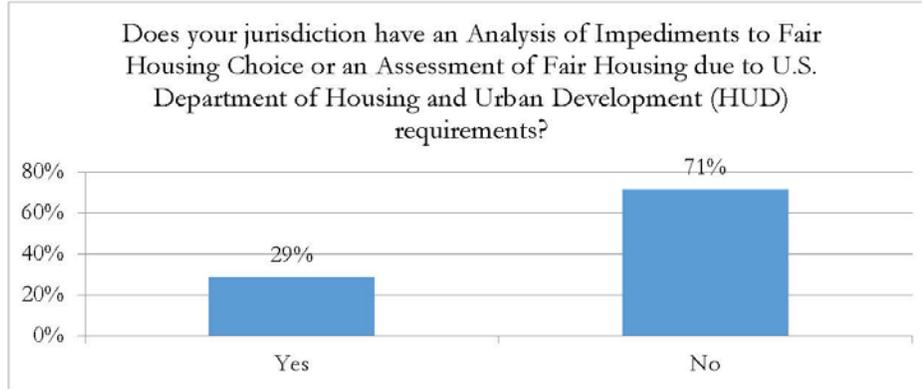
Question twenty-four asked jurisdictions that anticipated a loss of units in assisted housing developments in the next decade to estimate how many such will be lost and why. The one jurisdiction that anticipated a loss, the city of Ripon, indicated that it is unknown how many units will be lost or why.

Affirmatively Furthering Fair Housing

The fifth section of the Survey, which included questions twenty-five through thirty-four, focused on issues related to affirmatively furthering fair housing. Question twenty-five asked jurisdictions to indicate whether they have an analysis of impediments to fair housing choice or an assessment of fair housing due to U.S. Department of Housing and Urban Development (HUD) requirements. Whereas seventy-one percent (five out of seven) respondent jurisdictions indicated that they did not have an analysis of impediments to fair housing choice or an assessment of fair housing, twenty-nine percent (two of the seven) do have such an analysis or assessment.



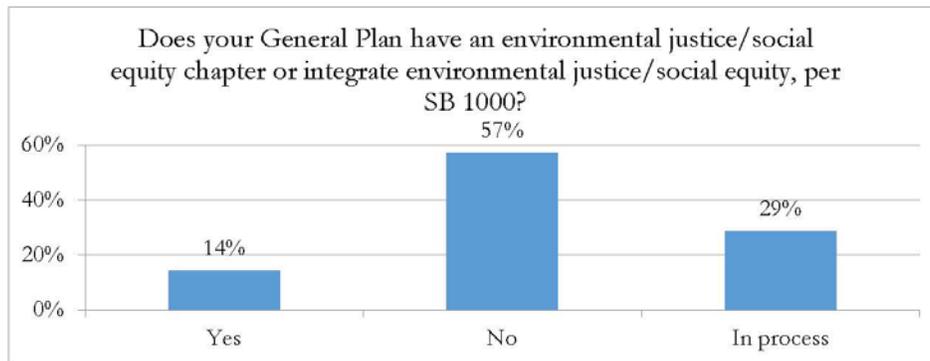
Figure 11: Analysis of Impediments to Fair Housing Choice or Assessment of Fair Housing



Question twenty-six asked jurisdictions for the year of their latest General Plan update. One jurisdiction’s general plan was last updated in 1991, one plan was updated in 2006, one plan was updated in 2010, one plan was comprehensively updated in 2011 and revised periodically thereafter, one plan was updated in 2016, one plan was updated in 2018, and one plan is currently undergoing an update with adoption of the new plan expected in June 2022. Question twenty-seven asked jurisdictions for the year of the latest update of the General Plan’s housing element. One jurisdiction’s housing element was updated in 2015, four jurisdictions updated the housing element in 2016, and two updated their housing elements in 2019.

Question twenty-eight asked if the jurisdiction’s General Plan has an environmental justice/social equity chapter or otherwise integrates environmental justice/social equity. Whereas fifty-seven percent (four of seven) of the responding jurisdictions indicated that they have not integrated environmental justice/social equity in their General Plan, one out of seven indicated that they do, and another twenty-nine percent (two of seven) indicated that their jurisdiction is in the process of integrating environmental justice/social equity in their General Plan.

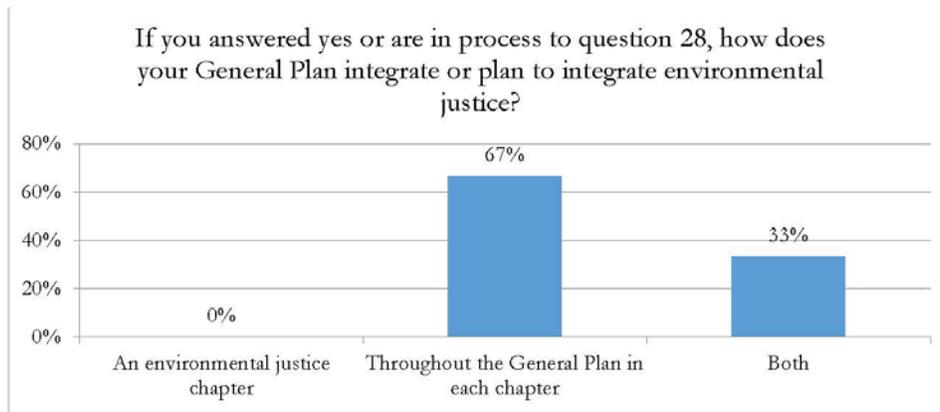
Figure 12: Environmental Justice/ Social Equity in General Plan





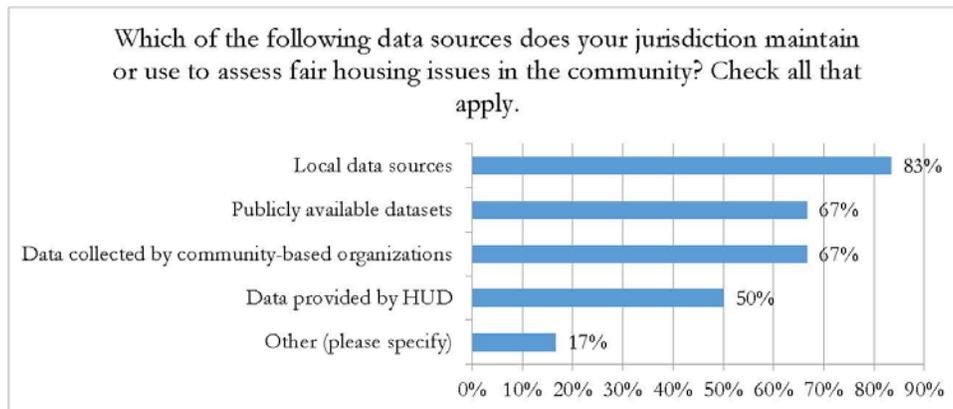
For jurisdictions integrating or in the process of integrating environmental justice/social equity in their General Plan, question twenty-nine asked about whether it is integrated in an environmental justice chapter and/or throughout the General Plan. Whereas sixty seven percent of the respondents (two out of three) indicated that environmental justice/social equity is integrated in the General Plan through a specific chapter and thirty three percent (one of three) indicated that they integrated environmental justice/social equity in a chapter and throughout the General Plan.

Figure 13: Environmental Justice/Social Equity Integration in General Plan



Question thirty asked about data sources maintained or utilized to assess fair housing issues. Of the seven respondents, fifty-seven percent (four jurisdictions) utilized data collected by community-based organizations. Three jurisdictions (forty-three percent) used data provided by HUD. Forty-three percent of jurisdictions utilized data publicly available data sources. Seventy-one percent (five of seven) of jurisdictions used local data sources.

Figure 14: Data Sources for Fair Housing Issues

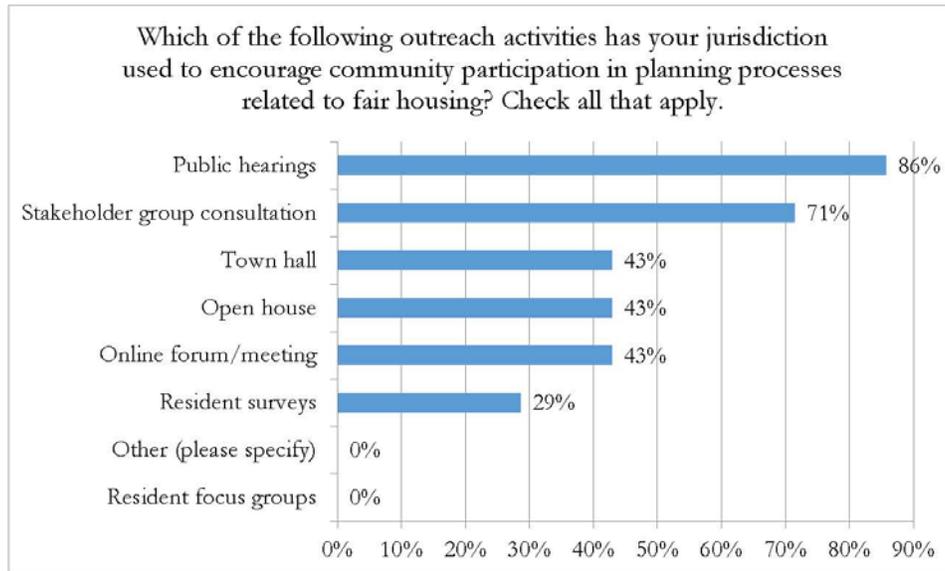




Question thirty-one asked jurisdictions to identify important data points to consider for affirmatively furthering environmental justice and fair housing. The City of Lodi suggested using local data sources. The City of Ripon suggested using census data. The city of Lathrop called for the analysis of “the effects of home purchases as investments vs. for housing, the effects of house flipping, the effects of the Bay Area real estate market on San Joaquin County and the effects of short-term rentals”.

Question thirty-two asked jurisdictions to identify the outreach activities utilized to foster community participation in planning related to fair housing. Eighty-six percent of respondents, including six out of seven responding jurisdictions, indicated that they utilize public hearings to encourage community participation in planning related to fair housing. Five of seven responding jurisdictions used stakeholder group consultations. Three out of seven responding jurisdictions selected online forum/meeting, open house and town halls. Two of seven respondents used resident surveys.

Figure 15: Community Outreach Activities for Participation in Fair Housing Planning Processes



Question thirty-three asked jurisdictions to describe their goals for community participation in fair housing planning. The city of Lodi responded, “Annual CDBG contribution to SJC Fair Housing, received public information through City sponsored community-based committees.” The City of Tracy identified “better decisions and more partnerships” as goals for community participation. The city of Ripon’s goals were “to use the best available technology and achieve the widest possible participation.” The city of Lathrop responded “City webpage. General Plan Update webpage. Standard noticing prior to public workshops & public hearings including newspaper advertisements and posting in various locations throughout the community. Interested parties lists, and email blasts



to those that provided their email address. Online Community survey.” Question thirty-four asks jurisdictions to indicate their level of success at achieving goals for community participation in fair housing planning. The five jurisdictions that responded all believed that they were “somewhat successful” in achieving their goals for community participation.

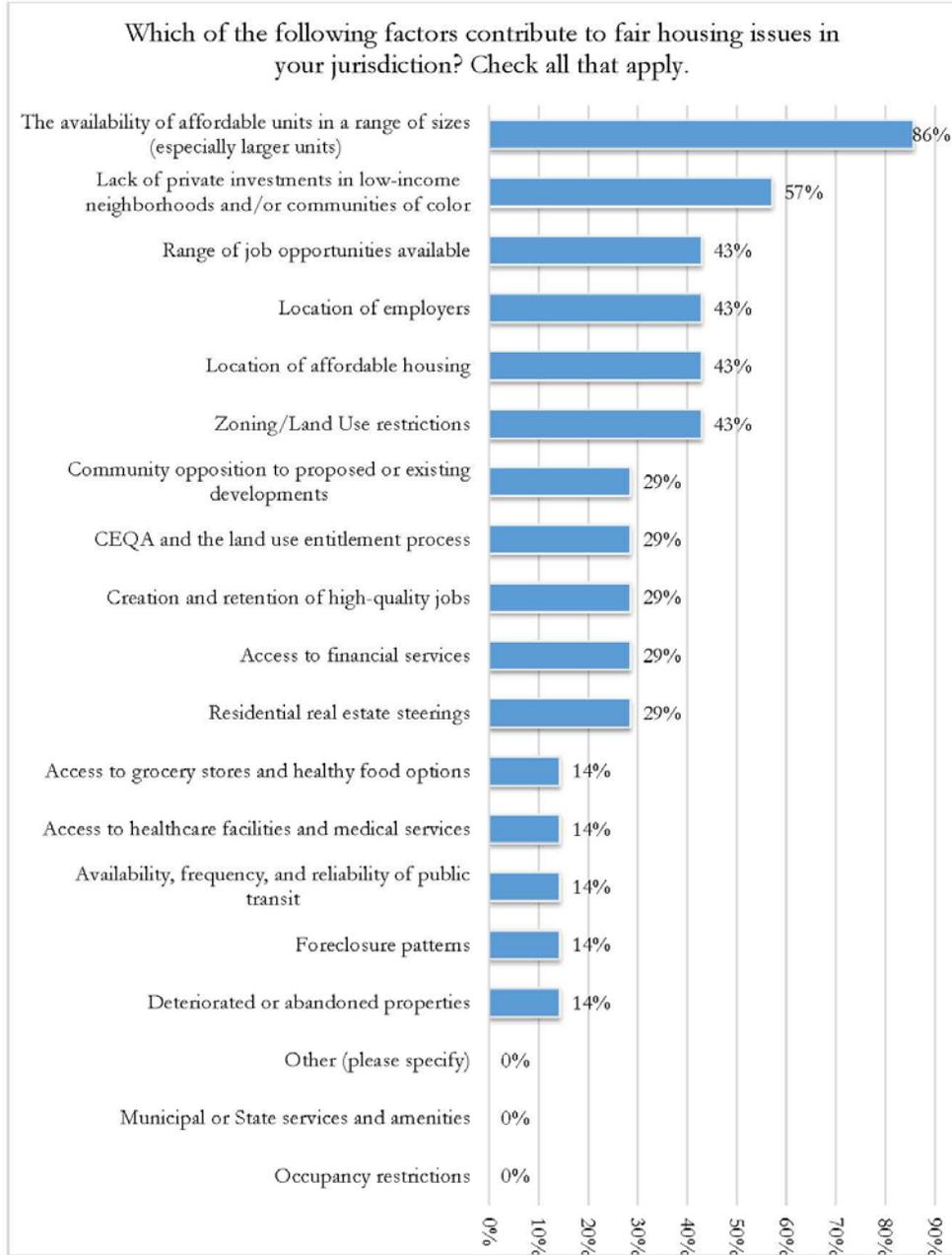
When explaining a lack of success at meeting goals for community participation in fair housing planning, one respondent mentioned low attendance while one respondent was “not sure” why participation goals were only somewhat successful. One respondent credited the online survey with contributing to a somewhat successful result.

Fair Housing Issues

The next section of the Survey, which focused on fair housing issues, consisted of questions thirty-five and thirty-six. Question thirty-five asked jurisdictions to indicate what factors contributed to fair housing issues in the jurisdiction. No jurisdictions selected occupancy restrictions or municipal and state services and amenities. Six jurisdictions (eighty-six percent) cited the availability of affordable units in a range of sizes (especially larger units). Four jurisdictions (fifty-seven percent) cited lack of private investments in low-income neighborhoods and/or communities of color, including services or amenities. Three jurisdictions (forty-three percent) cited location of employers, location of affordable housing, and the range of job opportunities available. Two jurisdictions cited residential real estate steerings, access to financial services, creation and retention of high-quality jobs, CEQA and the land use entitlement process, and community opposition to proposed or existing developments. Deteriorated or abandoned properties, foreclosure patterns, availability, frequency, and reliability of public transit, access to healthcare facilities and medical services, access to grocery stores and healthy food options were all cited by one jurisdiction.



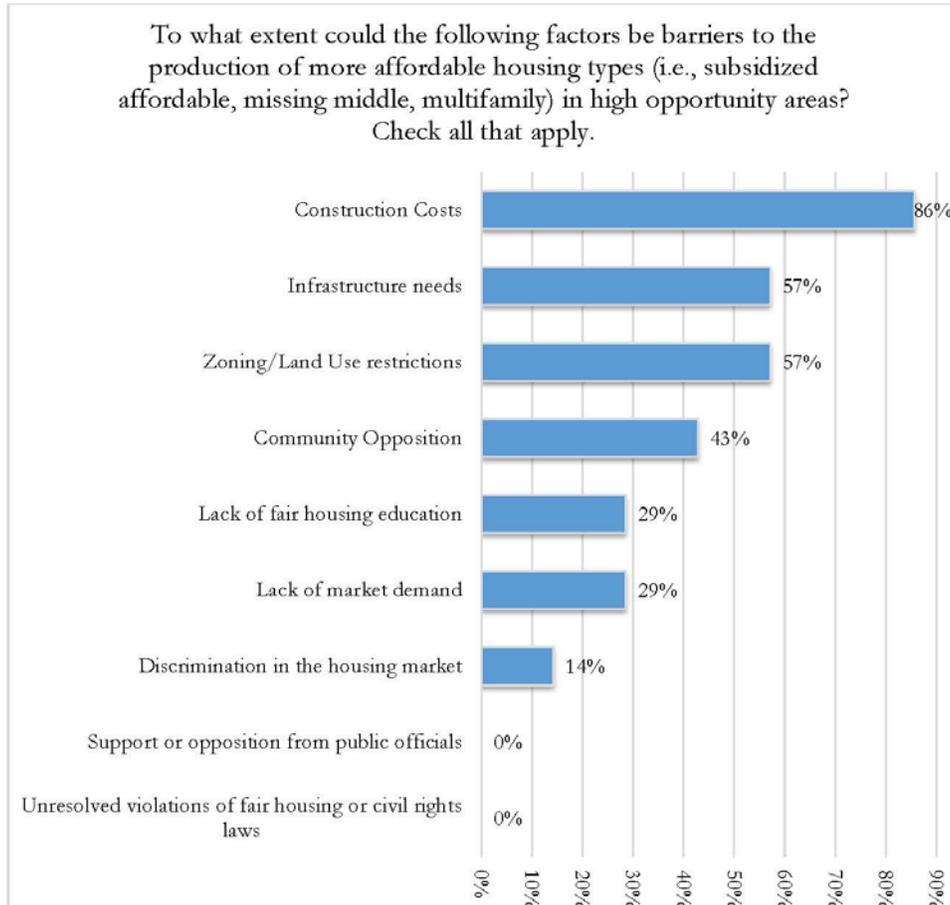
Figure 16: Factors Contributing to Fair Housing Issues in Jurisdiction





Question thirty-six asked jurisdictions to identify factors that could act as barriers to the production of more types of affordable housing in high opportunity areas.

Figure 17: Barriers to Production of More Affordable Housing Types in High Opportunity Areas



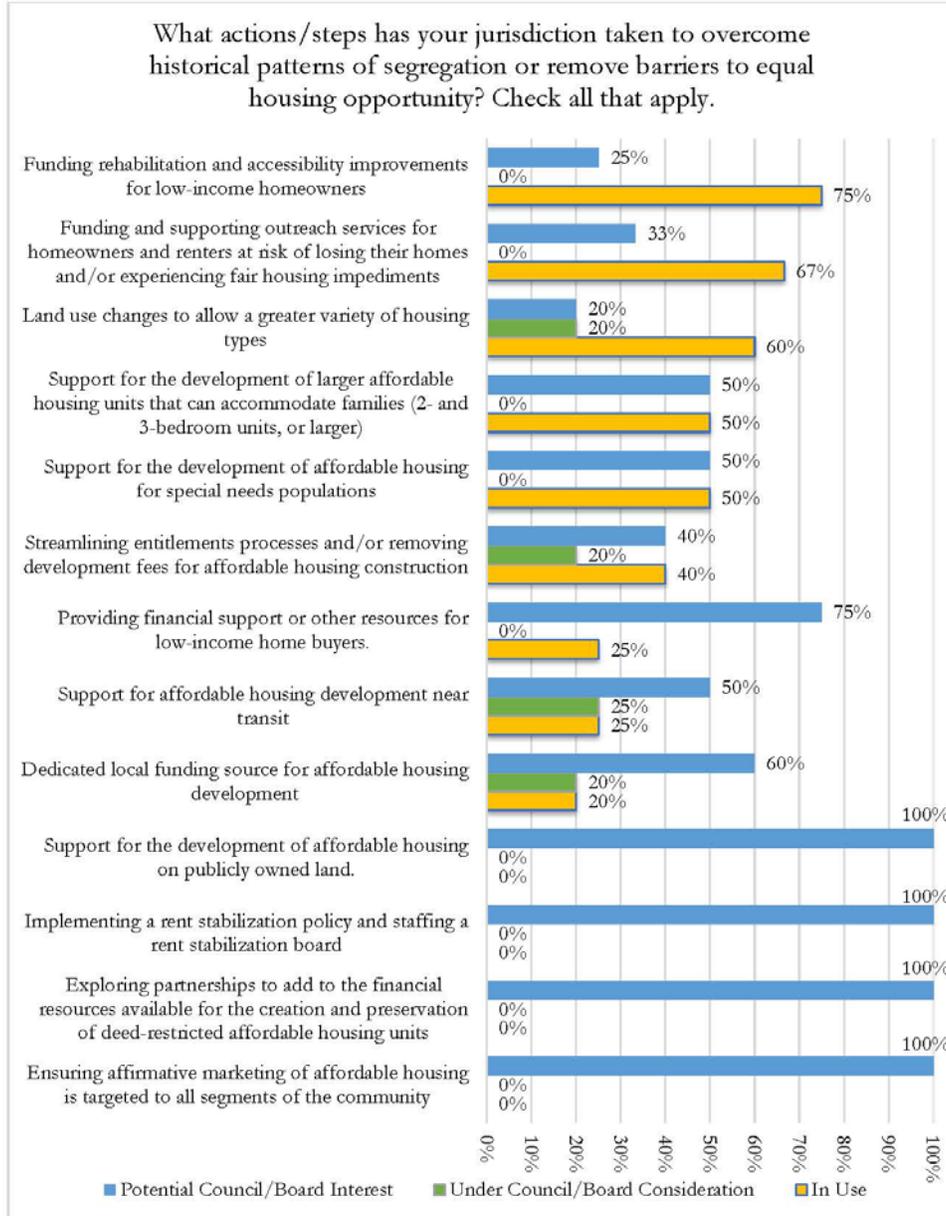
Six jurisdictions (eighty-six percent) cited construction costs as a barrier to production of more affordable housing. Four jurisdictions (fifty-seven percent) cited Zoning/Land Use restrictions (density/intensity/ height limits, parking requirements, minimum lot size) as a barrier. Four jurisdictions (fifty-seven percent) cited infrastructure needs as a barrier. Three jurisdictions (forty-three percent) cited community opposition. Lack of resources for fair housing agencies and organizations were cited by two jurisdictions (twenty-nine percent) as was lack of fair housing education and lack of market demand. One jurisdiction cited discrimination in the housing market.



Fair Housing Goals and Actions

The seventh and final section of the Survey, which focuses on fair housing goals and actions, consists of questions thirty-seven through forty-one. Question thirty-seven asked jurisdictions to identify actions taken to overcome historical patterns of segregation or to remove barriers to equal housing opportunity. Seventy-one percent of responding jurisdictions (five of seven) indicated that the following actions were either in use, under consideration for use, or potentially of interest for use in the jurisdiction: Dedicated local funding source for affordable housing development, land use changes to allow a greater variety of housing types, streamlining entitlements processes and/or removing development fees for affordable housing construction. Fifty-seven percent of responding jurisdictions (four of seven) indicated that the following actions were either in use, under consideration for use, or potentially of interest for use in the jurisdiction: funding rehabilitation and accessibility improvement for low income homeowners, support for affordable housing development near transit, support for the development of additional 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 larger housing units that can accommodate families, and/or providing financial resources or other support for low-income home buyers. Forty-three percent of responding jurisdictions (three of seven) indicated that the following actions were either in use, under consideration for use, or potentially of interest for use in the jurisdiction: ensuring affirmative marketing of affordable housing is targeted to all segments of the community, 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, implementing a rent stabilization policy and staffing a rent stabilization board, and/or support for the development of affordable housing on publicly owned land.

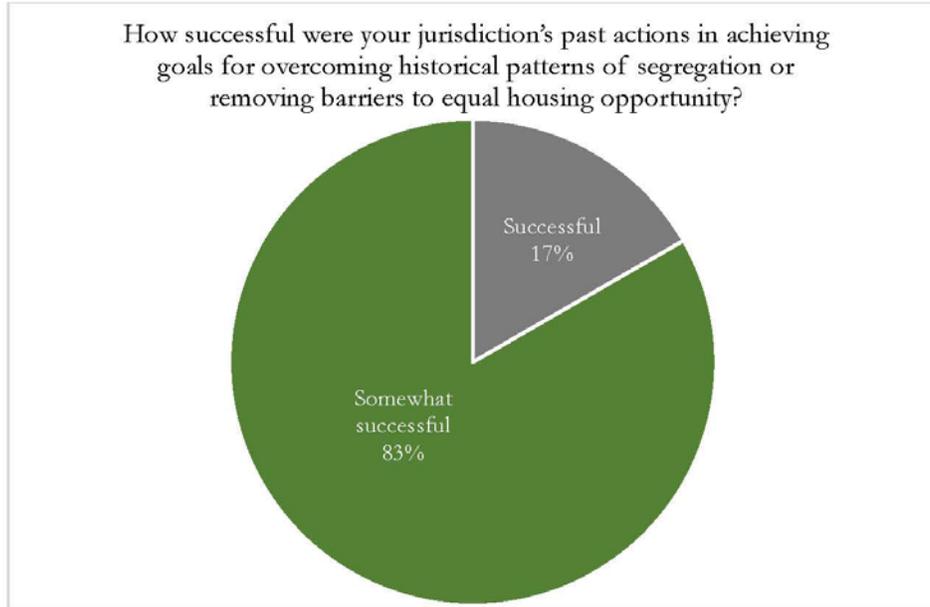
Figure 18: Actions to Overcome Historical Segregation or to Remove Barriers to Equal Housing Opportunity





Question thirty-eight asks jurisdictions to indicate their level of success in achieving goals for overcoming historical patterns of segregation or removing barriers to equal housing opportunity. Seventy-one percent of jurisdictions surveyed (five of seven) indicated that they were “[s]omewhat successful” and another one of seven indicated that they were successful. One jurisdiction did not respond to the question.

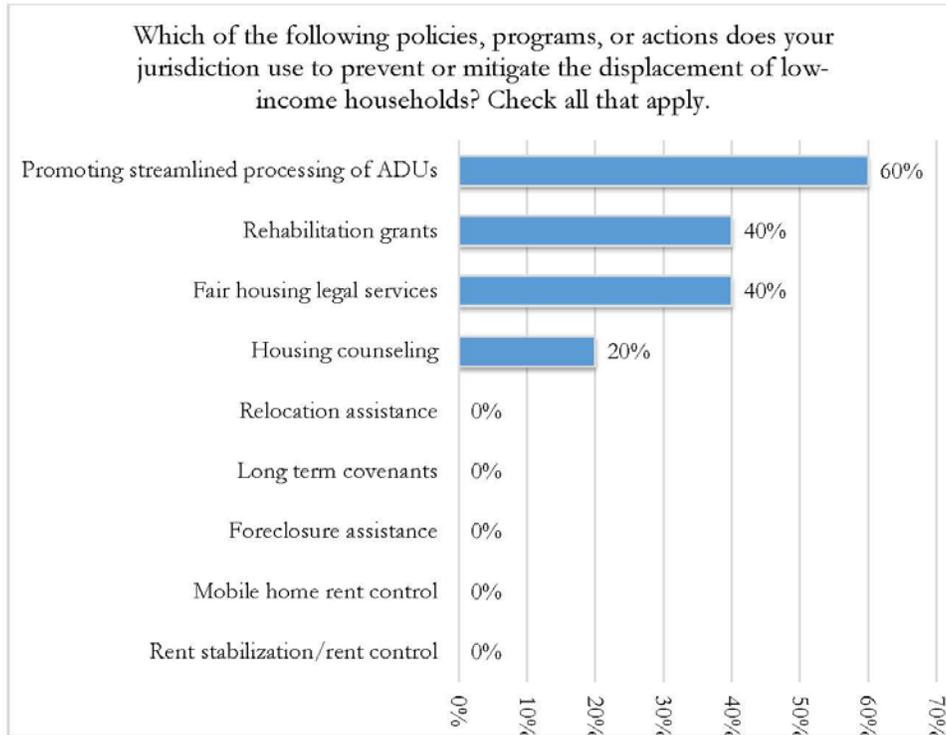
Figure 19: Assessment of Overcoming Historical Segregation or Removing Barriers to Housing Opportunity



Question thirty-nine asked jurisdictions to explain their success or lack of success at overcoming historical patterns of segregation or removing barriers to equal housing opportunity. The City of Lathrop explained their somewhat successful outcomes by stating that “The City of Lathrop took action several years ago to create an overlay zone in the Historical Lathrop area that allows a larger variety of housing types and densities to be intermixed with existing low-density, single-family residences. Although the overlay zoning has existed for several years, there has not been a lot of interest in development of multi-family housing.” The City of Lodi said that their somewhat successful ability to overcome patterns of segregation and remove barriers to equal housing was “based on” [their] Annual Citizen Participation Plan.”

Question forty asked jurisdictions to identify policies, programs, or actions used to prevent or mitigate the displacement of low-income households in the jurisdiction.

Figure 20: Methods Used to Prevent or Mitigate Displacement of Low-Income Households

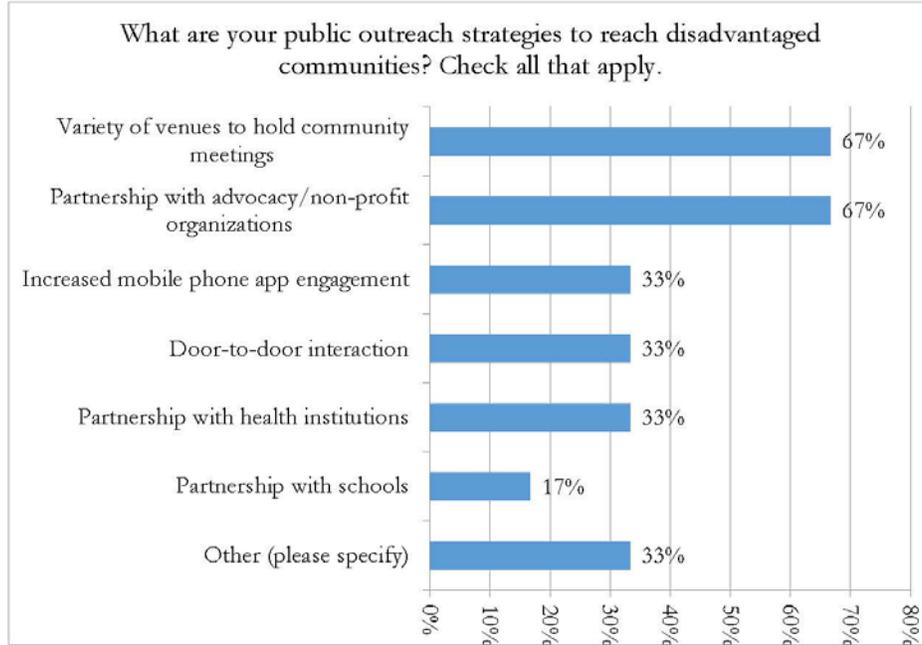


Forty-three percent responding jurisdictions (three of seven) engage in “promoting streamlined processing of ADUs” in order to prevent or mitigate the displacement of low-income households. Twenty-nine percent of responding jurisdictions (two out of seven) utilize “rehabilitation grants” and/or “fair housing legal services”. One jurisdiction utilizes “housing counseling”. None of the responding jurisdictions utilize “mobile home rent control”, “rent stabilization/rent control”, “foreclosure assistance”, “long term covenants”, or “relocation assistance” to prevent or mitigate the displacement of low-income households.

Finally, question forty-one, the last question of the Survey, asked respondents to identify public outreach strategies used to reach disadvantaged communities. The majority of responding jurisdictions (four out of seven) utilize “partnerships with advocacy/nonprofit organizations” and/or a “variety of venues to hold community meetings”. The following strategies were utilized by twenty nine percent of jurisdictions: “increased mobile phone app engagement”, “partnership with health institutions”, and “door to door interaction.” One jurisdiction utilized “[a] partnership with schools.”



Figure 21: Public Outreach Strategies to Reach Disadvantaged Communities





ATTACHMENT F: Jurisdictional Survey of the Housing Environment

DRAFT



SJCOG_RHNA6_Survey

Introduction

California Government Code requires that each Council of Government must survey its member jurisdictions for information to inform development of the RHNA Methodology and Plan. This survey contains a series of questions related to these Objectives and Factors required for consideration. The Objective and Factors are described below:

Government Code specifies five Objectives all RHNA Plans must further:

1. Increase housing supply and mix of housing types, with the goal of improving housing affordability and equity in all cities and counties within the region.
2. Promote infill development and socioeconomic equity; protect environmental and agricultural resources; encourage efficient development patterns; and achieve greenhouse gas reduction targets.
3. Improve intra-regional jobs-to-housing relationship, including the balance between low-wage jobs and affordable housing units for low-wage workers in each jurisdiction.
4. Balance disproportionate household income distributions (more high-income allocation to lower-income areas, and vice versa)
5. Affirmatively further fair housing to 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. Policies to preserve or protect land from urban development.
6. Opportunities to maximize use of transit and existing transportation infrastructure.
7. Policies directing growth toward incorporated areas.
8. Existing or projected loss of units contained in affordable housing developments.
9. High housing cost burdens.
10. The rate of overcrowding.
11. Housing needs of farm-workers.
12. Housing needs generated by a university within the jurisdiction.
13. Housing needs of individuals and families experiencing homelessness.
14. Units lost during a state of emergency that have yet to be replaced.
15. The region's SB 375 Greenhouse Gas Reduction Targets.

Please contact Thomas Pogue at tpogue@pacific.edu with any questions about the survey or its relationship to the RHNA Methodology and Plan.

* 1. Please tell us which jurisdiction your responses are for:

Name of Jurisdiction

2. Please share with us your contact details

Your Name

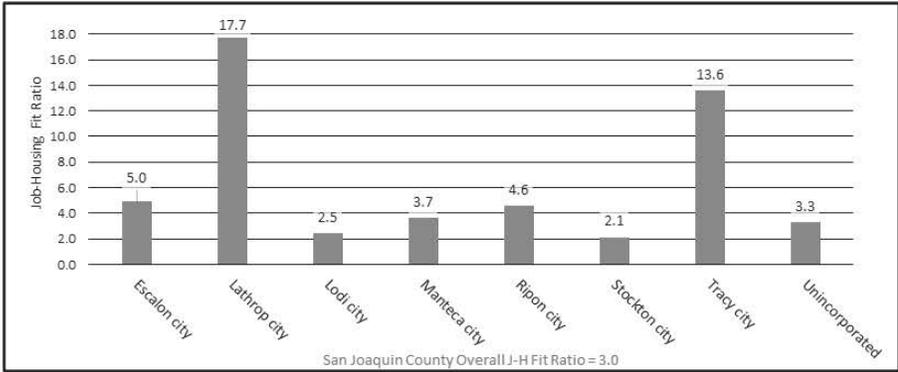
Your Title

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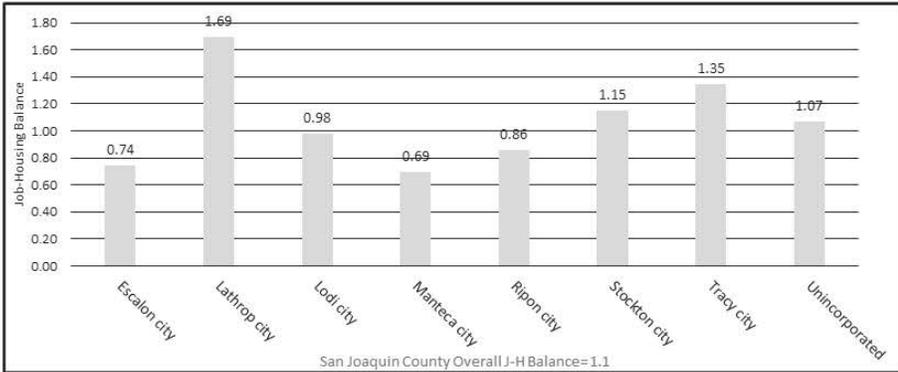


SJCOG_RHNA6_Survey
Jobs and Housing

Job-Housing Fit Ratio



Job-Housing Balance



3. The Jobs-Housing Fit Ratio in the first figure above measures the number of lower-wage jobs (earnings less than \$3,333/month) to affordable housing units (rent less than \$1,000/month). The Jobs-Housing Balance in the second figure above measures the number of all jobs relative to the number of all housing units. Does this information correspond to your jurisdiction's perceptions?



4. What would you say are the primary reasons for the imbalance in your jurisdiction's **jobs-housing fit ratio**?

5. Which of the following impacts does the imbalance of low-wage workers to homes affordable to low-wage workers have on your jurisdiction? Check all that apply.

- Difficulty for local employers to hire and/or retain workers
- Long commutes into the jurisdiction
- High rates of housing cost burden for residents
- Long commutes to jobs outside of the jurisdiction
- Other (please specify)

6. Does your jurisdiction use jobs-housing fit data to inform its policy decisions?

- Yes
- No

7. Given your jurisdiction's imbalance in the jobs-housing fit for low-wage workers, which of the following policies, programs, or strategies would be helpful to address this imbalance? Check all that apply.

- Increased funding for affordable Housing
- Living wage employment ordinances
- Increased housing density
- Rent stabilization/rent control
- Inclusionary zoning
- First source hiring ordinances
- Community land trusts
- None of these would be helpful



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Housing Opportunities and Constraints

8. Which of the following apply to your jurisdiction as an opportunity and/or a constraint for development of additional housing by 2031?

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



Please use the space below to describe other opportunities and/or constraints for your jurisdiction's development of additional housing by 2031.

9. Of the issues that you marked as opportunities in Question 8, list up to three that you feel represent the greatest opportunities for developing additional housing in your jurisdiction by 2031 and explain the reasoning for your selection?

10. Of the issues that you marked as constraints in Question 8, list up to three that you feel represent the greatest constraints for developing additional housing in your jurisdiction by 2031 and explain the reasoning for your selection?

11. 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
- Federal and State funding availability (market driven - necessitate subsidy to build)
- Lack of requisite infrastructure, such as sewer and water
- Other (please specify)
- Local gap financing for affordable housing development
- Local affordable housing development capacity



12. 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.

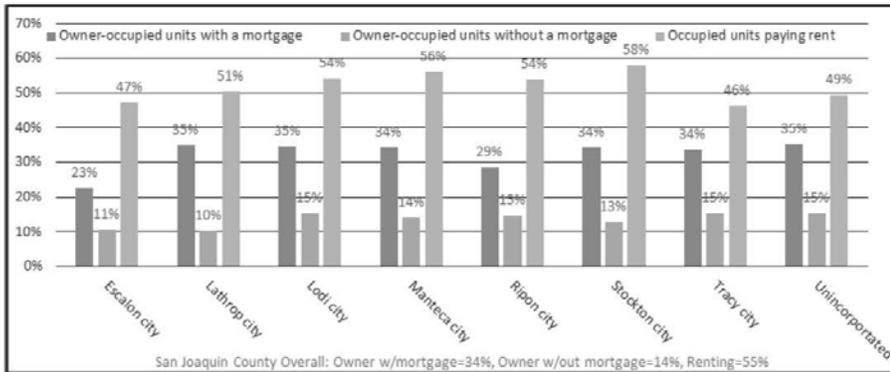
- | | |
|---|--|
| <input type="checkbox"/> Designating Priority Conservation Areas | <input type="checkbox"/> Increasing local employment opportunities to reduce commute lengths for residents |
| <input type="checkbox"/> Designating Priority Development Areas | <input type="checkbox"/> Investment in transit expansion |
| <input type="checkbox"/> Encouraging mixed-use development | <input type="checkbox"/> Investment in maintaining or improving existing public transportation infrastructure |
| <input type="checkbox"/> Encouraging development near transit | <input type="checkbox"/> Investment in pedestrian, bicycle, and active transportation infrastructure |
| <input type="checkbox"/> Energy efficiency standards in new construction or retrofits | <input type="checkbox"/> Land use changes that encourage a diversity of housing types and/or mixed-use development |
| <input type="checkbox"/> Implementing a Climate Action Plan | |
| <input type="checkbox"/> Other (please specify) | |



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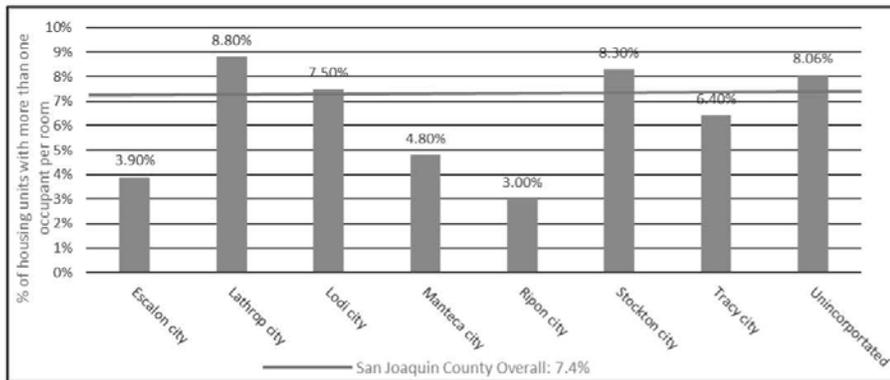
Housing Affordability and Overcrowding

Percentage of Cost Burdened Households by Ownership Type



13. Please see the cost burden data in the figure above for the percentage of households in your jurisdiction currently paying more than 30% of their income toward housing costs. Has your jurisdiction considered what impacts high housing costs and the proportion of rent-burdened households have on residents in your jurisdiction?

Overcrowding Rate





14. Government Code Section 65584.01(b)(1)(C)(i) defines an “overcrowded” household as a household with more than one resident per room in each room in a dwelling. Accordingly, the overcrowding rate in your jurisdiction is reported above for your reference. Has your jurisdiction considered what impacts overcrowding has on residents in your jurisdiction?



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Housing Demand

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

- Yes
- No
- Unsure

16. If you answered yes to Question 15, what are the main reasons for this unmet demand?

17. Is there currently any unmet housing demand in your jurisdiction created by postsecondary educational institutions?

- Yes
- No
- Unsure

18. If you answered yes to Question 17, what are the main reasons for this unmet demand?

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

- Yes
- No
- Unsure

20. If you answered yes to Question 19, please provide an estimate for the local homeless population and corresponding need for transitional housing.

21. Has your jurisdiction experienced a loss of units in assisted housing developments in the past 10 years due to expiring affordability contracts or other issues facing at-risk affordable housing units?

- Yes
- No
- Unsure



22. If you answered yes to Question 21, please provide an estimate of the number of lost units.

23. Does your jurisdiction anticipate a loss of units in assisted housing developments in the next 10 years?

- Yes
- No
- Unsure

24. If you answered yes to Question 23, please estimate how many units will be lost and why.



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Affirmatively Furthering Fair Housing

As a result of recent legislation, RHNA and local Housing Elements are now required to “affirmatively further fair housing” [Government Code Section 65584(d)]. Per Government Code 65584(e), affirmatively furthering fair housing is defined as *“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.”*

To comply with this requirement, SJCOG is collecting information on local jurisdictions’ fair housing issues as well as strategies and actions for achieving fair housing goals. In developing the fair housing questions that follow in this section of the survey, SJCOG relied on guidance documents from the U.S. Department of Housing and Urban Development (HUD). While recognizing that not all jurisdictions have completed an Analysis of Impediments or Assessment of Fair Housing for HUD, these questions should help jurisdictions understand the analysis framework they will need to use in demonstrating that their Housing Element affirmatively furthers fair housing.

Please answer the questions in this section to the best of your ability using your jurisdiction’s Housing Element, Analysis of Impediments to Fair Housing Choice, Assessment of Fair Housing, and/or other data sources.



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Fair Housing Planning and Data Sources

25. Does your jurisdiction have an Analysis of Impediments to Fair Housing Choice or an Assessment of Fair Housing due to U.S. Department of Housing and Urban Development (HUD) requirements?

- Yes
- No

26. When did your jurisdiction last update the General Plan? Please provide the year.

27. When did your jurisdiction last update the General Plan's Housing Element? Please provide the year.

28. Does your General Plan have an environmental justice/social equity chapter or integrate environmental justice/social equity, per SB 1000?

- Yes
- No
- In process

29. If you answered yes or are in process to question 28, how does your General Plan integrate or plan to integrate environmental justice?

- An environmental justice chapter
- Throughout the General Plan in each chapter
- Both

Please use the space below to make further comments

30. Which of the following data sources does your jurisdiction maintain or use to assess fair housing issues in the community? Check all that apply.

- Data collected by community-based organizations
- Local data sources
- Data provided by HUD
- Publicly available datasets
- Other (please specify)



31. Are there particular data points that are important to consider in developing the SJCOG RHNP, especially those measuring equity or opportunity in the context of furthering of environmental justice and Affirmatively Furthering Fair Housing?

32. Which of the following outreach activities has your jurisdiction used to encourage community participation in planning processes related to fair housing? Check all that apply.

- | | |
|---|---|
| <input type="checkbox"/> Online forum/meeting | <input type="checkbox"/> Resident surveys |
| <input type="checkbox"/> Open house | <input type="checkbox"/> Stakeholder group consultation |
| <input type="checkbox"/> Public hearings | <input type="checkbox"/> Town hall |
| <input type="checkbox"/> Resident focus groups | |
| <input type="checkbox"/> Other (please specify) | |

33. Please describe your goals for the process to elicit community participation for fair housing planning.

34. How successful was your jurisdiction in achieving its goals for the process to elicit community participation for fair housing planning?

- Successful
- Somewhat successful
- Somewhat unsuccessful
- Unsuccessful

Describe the reasons for the success or lack of success of your jurisdiction's community engagement efforts.



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Fair Housing Issues

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

- | | |
|---|---|
| <input type="checkbox"/> Zoning/Land Use restrictions (density/intensity/height limits, parking requirements, minimum lot size) | <input type="checkbox"/> Foreclosure patterns |
| <input type="checkbox"/> Occupancy restrictions | <input type="checkbox"/> Municipal or State services and amenities |
| <input type="checkbox"/> The availability of affordable units in a range of sizes (especially larger units) | <input type="checkbox"/> Availability, frequency, and reliability of public transit |
| <input type="checkbox"/> Residential real estate steerings | <input type="checkbox"/> Access to healthcare facilities and medical services |
| <input type="checkbox"/> Deteriorated or abandoned properties | <input type="checkbox"/> Access to grocery stores and healthy food options |
| <input type="checkbox"/> Lack of private investments in low-income neighborhoods and/or communities of color, including services or amenities | <input type="checkbox"/> Creation and retention of high-quality jobs |
| <input type="checkbox"/> Access to financial services | <input type="checkbox"/> Range of job opportunities available |
| <input type="checkbox"/> Location of affordable housing | <input type="checkbox"/> CEQA and the land use entitlement process |
| <input type="checkbox"/> Location of employers | <input type="checkbox"/> Community opposition to proposed or existing developments |
| <input type="checkbox"/> Other (please specify) | |

36. To what extent could the following factors be barriers to the production of more affordable housing types (i.e., subsidized affordable, missing middle, multifamily) in high opportunity areas? Check all that apply.

- | | |
|---|--|
| <input type="checkbox"/> Zoning/Land Use restrictions (density/intensity/height limits, parking requirements, minimum lot size) | <input type="checkbox"/> Unresolved violations of fair housing or civil rights laws |
| <input type="checkbox"/> Community Opposition | <input type="checkbox"/> Discrimination in the housing market |
| <input type="checkbox"/> Construction Costs | <input type="checkbox"/> Support or opposition from public officials |
| <input type="checkbox"/> Lack of market demand | <input type="checkbox"/> Lack of fair housing education |
| <input type="checkbox"/> Infrastructure needs | <input type="checkbox"/> Lack of resources for fair housing agencies and organizations |
| <input type="checkbox"/> Other (please specify) | |



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Fair Housing Goals and Actions

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

	In Use	Under Council/Board Consideration	Potential Council/Board Interest
Dedicated local funding source for affordable housing development	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Ensuring affirmative marketing of affordable housing is targeted to all segments of the community	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
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	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Funding rehabilitation and accessibility improvements for low-income homeowners	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Funding and supporting outreach services for homeowners and renters at risk of losing their homes and/or experiencing fair housing impediments	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Implementing a rent stabilization policy and staffing a rent stabilization board	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Land use changes to allow a greater variety of housing	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>



types			
Streamlining entitlements processes and/or removing development fees for affordable housing construction	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Support for affordable housing development near transit	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
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.)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Support for the development of larger affordable housing units that can accommodate families (2- and 3-bedroom units, or larger)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Support for the development of affordable housing on publicly owned land.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Providing financial support or other resources for low-income home buyers.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other (please specify)	<input type="text"/>		

38. How successful were your jurisdiction's past actions in achieving goals for overcoming historical patterns of segregation or removing barriers to equal housing opportunity?

Successful
 Somewhat successful
 Somewhat unsuccessful
 Unsuccessful



39. Describe the reasons for the success or lack of success of your jurisdiction's actions to overcome historical patterns of segregation or remove barriers to equal housing opportunity.

40. 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.

- | | |
|---|--|
| <input type="checkbox"/> Rent stabilization/rent control | <input type="checkbox"/> Housing counseling |
| <input type="checkbox"/> Mobile home rent control | <input type="checkbox"/> Long term covenants |
| <input type="checkbox"/> Foreclosure assistance | <input type="checkbox"/> Rehabilitation grants |
| <input type="checkbox"/> Promoting streamlined processing of ADUs | <input type="checkbox"/> Relocation assistance |
| <input type="checkbox"/> Fair housing legal services | |

41. What are your public outreach strategies to reach disadvantaged communities? Check all that apply.

- | | |
|---|---|
| <input type="checkbox"/> Partnership with advocacy/non-profit organizations | <input type="checkbox"/> Variety of venues to hold community meetings |
| <input type="checkbox"/> Partnership with schools | <input type="checkbox"/> Door-to-door interaction |
| <input type="checkbox"/> Partnership with health institutions | <input type="checkbox"/> Increased mobile phone app engagement |
| <input type="checkbox"/> Other (please specify) | |



ATTACHMENT G: Housing Element and RHNA Law

[ARTICLE 10.6. Housing Elements \[California Government Code §§ 65580 - 65589.11\]](#)

[https://leginfo.legislature.ca.gov/faces/codes_displayText.xhtml?lawCode=GOV&division=1.&title=7.&part=&chapter=3.&article=10.6.](https://leginfo.legislature.ca.gov/faces/codes_displayText.xhtml?lawCode=GOV&division=1.&title=7.&part=&chapter=3.&article=10.6)

DRAFT