

BUTTE COUNTY ASSOCIATION  
OF GOVERNMENTS



BOARD OF DIRECTORS MEETING  
OCTOBER 22, 2020

## Acronyms for Butte County Association of Governments

ACRONYM	MEANING
AB	Assembly Bill
ACOE	Army Corps of Engineers
AFR	Accident Frequency Ratio
APS	Alternative Planning Strategy
AQMD	Air Quality Management District
ARB	Air Resource Board
AVL	Automatic Vehicle Location
BCAG	Butte County Association of Governments
CALCOG	California Association Council of Governments
CARB	California Air Resource Board
CEQA	California Environmental Quality Act
CMAQ	Congestion Mitigation & Air Quality
CON	Construction
CTC	California Transportation Commission
CTIPS	California Transportation Improvement Program System
DFG	California Department of Fish and Game
DOT	Department of Transportation
EIR	Environmental Impact Report
EMFAC	Emissions Factors
EPA	Environmental Protection Agency
FHWA	Federal Highway Administration
FTA	Federal Transit Administration
FTIP	Federal Transportation Improvement Program
FY	Fiscal Year
GARVEE	Grant Anticipation Revenue Vehicle Program
GhG	Greenhouse Gas Emissions
GIC	Geographical Information Center
GIS	Geographic Information Systems
GPS	Global Positional Satellite
HCP	Habitat Conservation Plan
IIP	Interregional Improvement Program
IPG	Intermodal Planning Group
ITIP	Interregional Transportation Improvement Program
ITS	Intelligent Transportation Systems
JPA	Joint Powers Agreement
LAFCO	Local Agency Formation Commission
LTF	Local Transportation Fund
MPO	Metropolitan Planning Organization
NAAQS	National Air Quality Standards
NCCP	Natural Community Conservation Plan
NEPA	National Environmental Policy Act
NMFS	National Marine Fisheries Service (Also NOAA Fisheries)

ACRONYM	MEANING
NOAA	National Oceanic and Atmospheric Administration Fisheries (Also NMFS)
OWP	Overall Work Program
PA&ED	Project Approval & Environmental Document
PDT	Project Development Team
PEER	Permit Engineering Evaluation Report
PL	Federal Planning Funds
PPH	Passengers Per Revenue Hour
PLH	Public Lands Highway
PPM	Planning Programming & Monitoring
PPNO	Project Programming Number
PS&E	Plans, Specifications & Estimates
PSR	Project Study Report
PTMISEA	Public Transportation Modernization Improvement and Service Enhancement Account
PUC	Public Utilities Code
R/W	Right of Way
RFP	Request for Proposals
RHNA	Regional Housing Needs Allocation
RHNP	Regional Housing Needs Plan
RIP	Regional Improvement Program
RTAC	Regional Target Advisory Committee
RTIP	Regional Transportation Improvement Program
RTP	Regional Transportation Plan
RTPA	Regional Transportation Planning Agency
SACOG	Sacramento Area Council of Governments
SAFETEA-LU	Safe Accountable Flexible Efficient Transportation Equity Act: A Legacy for Users
SCEA	Sustainable Community Environmental Assessment
SCS	Sustainable Community Strategy
SDP	Strategic Deployment Plan
SHOPP	State Highway Operation Protection Program
SSTAC	Social Services Transportation Advisory Council
STA	State Transit Assistance
STIP	State Transportation Improvement Program
TAC	Transportation Advisory Committee
TAOC	Transit Administrative Oversight Committee
TCRP	Transportation Congestion Relief Program
TDA	Transportation Development Act
TE	Transportation Enhancements
TIP	Transportation Improvement Program
TPP	Transit Priority Project
TSGP	Transit Security Grant Program
USACE	United States Army Corps of Engineers
USFWS	United States Fish and Wildlife Service
UTN	Unmet Transit Needs
WE	Work Element



## BCAG Board of Directors

October 22, 2020  
9:00 a.m.



### BCAG Conference Room

326 Huss Drive, Suite 150  
Chico, CA 95928

BCAG BOARD MEETING LIVE [Zoom Link](#)

Due to the COVID-19 Pandemic, this meeting is being held remotely.

Members of the public may view and participate in the meeting through the following Zoom link:

Zoom Meeting ID: **856 8233 0288** Password: **345629**

1. Pledge of Allegiance
2. Roll Call

#### CONSENT AGENDA

3. Approval of Minutes from the September 24, 2020 BCAG Board of Directors Meeting (Attachment) – **Victoria**

ITEMS REMOVED FROM CONSENT AGENDA – *If Any*

#### ITEMS FOR ACTION

4. Approval of Final Allocation Methodology for the 2020 Regional Housing Needs Update (Attachment) – **Chris**
5. Approval of Resolution 2020/2021-05 for Allocation of Regional Early Action Planning (REAP) Grant Funds (Attachment) – **Chris**
6. Approval of 2020/21 Unmet Transit Needs Assessment and Findings (Attachment) – **Jim**
7. Authorize Executive Director to Negotiate and Execute Agreement for BCAG/BRT Operations Facility Electric Vehicle Underground Charging Infrastructure (Attachment) - **Andy**

#### ITEMS FOR INFORMATION

8. Draft 2020 Regional Transportation Plan (RTP)/ Sustainable Communities Strategy (SCS) and Supplemental Environmental Impact Report Public Review Period and Workshop (Attachment) – **Ivan**
9. Draft 2020 Regional Housing Needs Plan (RHNP) (Attachment) - **Chris**

#### ITEMS FROM THE FLOOR

10. Members of the public may present items to the BCAG Board of Directors, but no action will be taken other than placement on a future agenda.

#### ADJOURNMENT

11. The next meeting of the BCAG Board of Directors has been scheduled for Thursday December 10, 2020, **at the BCAG Board Room.**

*Copies of staff reports or other written documentation relating to items of the business referred to on the agenda are on file at the office of the Butte County Association of Governments (BCAG). Persons with questions concerning agenda items may call BCAG at (530) 809-4616.*

***Any handouts presented by speakers are to be distributed to the Board by the Clerk of the Board.***

BUTTE COUNTY ASSOCIATION  
OF GOVERNMENTS



BOARD OF DIRECTORS MEETING  
ITEM #3



**DRAFT MEETING MINUTES  
OF THE BUTTE COUNTY  
ASSOCIATION OF GOVERNMENTS  
SEPTEMBER 24, 2020**

The following minutes are a summary of actions taken by the Board of Directors. A digital recording of the actual meeting is available at BCAG’s office located at 326 Huss Drive, Suite 150, Chico, CA.

Board Member Connelly called the meeting to order at 9:01 a.m. at the BCAG Board Room, 326 Huss Drive, Suite 100, Chico CA.

**MEMBERS PRESENT IN PERSON**

Bill Connelly	Supervisor	District 1
Steve Lambert	Supervisor	District 4
Jody Jones	Councilmember	Town of Paradise

**MEMBERS PRESENT REMOTELY**

Randall Stone	Mayor	City of Chico
John Busch	Board Alternate	City of Biggs
Tami Ritter	Supervisor	District 3
Debra Lucero	Supervisor	District 2
Bruce Johnson	Board Alternate	City of Gridley

**MEMBERS ABSENT**

Chuck Reynolds	Mayor	City of Oroville
Quintin Crye	Councilmember	City of Gridley
Doug Teeter	Supervisor	District 5
Angela Thompson	Councilmember	City of Biggs

**STAFF PRESENT**

Jon Clark	Executive Director
Victoria Proctor	Administrative Assistant
Julie Quinn	Chief Fiscal Officer
Brian Lasagna	Regional Analyst
Sara Cain	Associate Senior Planner
Cheryl Massae	Human Resources Manager
Ivan Garcia	Transportation Programming Specialist
Jim Peplow	Senior Transit Planner

**OTHERS PRESENT**

Mike Wallace, Fehr & Peers  
Nima Kabirinassab, Caltrans District 3  
Lace Atencio, Transdev

## **BCAG Board of Directors Meeting – Item #3**

**October 22, 2020**

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- 1. Pledge of Allegiance**
- 2. Roll Call**

### **CONSENT AGENDA**

- 3. Approval of Minutes from the August 27, 2020 BCAG Board of Directors Meeting**
- 4. Approval of Amendment #2 for the 2020/21 Overall Work Program (OWP) & Budget and Overall Work Program Agreement (OWPA)**
- 5. Approval of the Project List for the FY 2020/21 California State of Good Repair (SGR) Program**
- 6. Approval for BCAG Executive Committee to Work with Executive Director on Annual Evaluation and Employment Agreement Extension**

Board Member Connelly requested a moment of silence to remember those whose lives were lost in the wildfires before voting on the Consent Agenda.

On motion by Board Member Jones and seconded by Board Member Lucero, the consent agenda was unanimously approved.

### **ITEMS FOR ACTION**

There were no items for action.

### **ITEMS FOR INFORMATION**

#### **7: Update on Post Camp Fire Study**

Staff reminded the Board that BCAG is preparing the Post Camp Fire Regional Population & Transportation Study to analyze regional population, housing, employment, and traffic patterns for pre and post Camp Fire time periods. Staff has been working with consultants from Fehr & Peers to complete this study.

Mike Wallace from Fehr & Peers remotely joined to give a presentation of study progress and what the numbers currently look like for population, housing, employment and traffic changes since the fire. The presentation detailed an overall decrease in traffic across the county due to the sharp decrease in traffic in Paradise and Magalia, which counterbalanced the increases in traffic in the cities in Butte County. Since survivors of the Camp Fire did not all stay within Butte County, there was relocation data for the surrounding counties as well. Those that stayed in Butte County primarily moved to Chico, and data shows that there was a drop in home ownership and a shift towards renting during this time. He also discussed how businesses had a decrease of almost 20% in the year following the Camp Fire.

After his presentation, the Board and Staff had a general discussion of the numbers with Mr. Wallace. There were a few specific questions about some of the terms used in the

study, however user error had to be factored in so a precise definition of some of the terms cannot be ascertained. This item was presented for information only.

**8: 2021 Federal Transportation Improvement Program (FTIP) Development**

Staff presented the status on the development of the 2021 Federal Transportation Improvement Program (FTIP). The 2021 FTIP is required to be adopted by the Board and submitted to Caltrans by March 1, 2021. Its purpose is to identify all transportation-related projects that require federal funding or other approval. Staff provided a timeline for the 2021 FTIP, as well as a breakdown of funding estimates that are being used within the document.

There was general conversation between Staff and the Board regarding the current state of the FTIP, with questions specifically regarding the nature of these funds. These are funds earmarked for transit projects, not studies related to transportation. This item was presented for information purposes only.

**9: Butte Regional Transit 4<sup>th</sup> Quarter 2019/20 Progress Report**

Quarterly, Staff presents the Board with a progress report on how Butte Regional Transit (B-Line) is faring in terms of farebox recovery, customer satisfaction, and safety concerns for each of the four types of service. Staff detailed to the Board how the fourth quarter of the 2019/20 fiscal year was impacted by the shelter in place order from March 2020 and the CARES Act signing from that same month.

Ridership across the board was down significantly during this period including during the seven weeks of free fares we were able to offer due to the CARES Act. As a result, we did not meet the farebox recovery ratio for the whole fiscal year in three out of the four types of transit offered. The Board asked if there will be a penalty for not meeting farebox this year, and Staff is unsure since most transit agencies are suffering the same problem due to COVID-19.

This item was presented for information purposes.

**ITEMS FROM THE FLOOR**

There were no items from the floor.

**ADJOURNMENT**

With no further items to discuss, the BCAG Board meeting adjourned at 9:40 AM.

**Attest:**

*Jon Clark, Executive Director*

*Victoria Proctor, Board Clerk*

*Butte County Association of Governments*



BUTTE COUNTY ASSOCIATION  
OF GOVERNMENTS



BOARD OF DIRECTORS MEETING  
ITEM #4



## BCAG BOARD OF DIRECTORS

## Item #4 Action

October 22, 2020

### APPROVAL OF FINAL ALLOCATION METHODOLOGY FOR THE 2020 REGIONAL HOUSING NEEDS UPDATE

**PREPARED BY:** Chris Devine, Planning Manager

**ISSUE:** BCAG is required to update its Regional Housing Needs Plan (RHNP) every 8 years. The last update was completed in 2012. BCAG staff has initiated the 2020 update of the RHNP which is scheduled for adoption in December 2020. Prior to adoption, a final allocation methodology must be approved by the BCAG Board of Directors.

**DISCUSSION:** At the August 27, 2020 BCAG Board of Directors meeting, the Board reviewed the draft allocation methodology, and a public hearing was held to solicit further public input. Concurrently, the California Department of Housing and Community Development (HCD) was conducting a 60-day review of the draft allocation methodology that began on August 10<sup>th</sup> and finished on October 9<sup>th</sup>.

**Attachment #1** includes a letter from HCD regarding their review of the draft methodology – HCD concluded that it furthers the five statutory objectives as required, conditioned on one small revision to increase the City of Biggs' allocation of low-income units by a single unit. As indicated in the letter, this was due to a requirement that each jurisdiction must receive at least one low- and very low-income unit to comply with Government Code Section 65584(d)(1).

This change has been made and represents the only change to the methodology since the Board reviewed the draft methodology in August (a few numbers did shift around slightly due to a rounding error). No further changes were requested by the Planning Directors Group, stakeholders, or members of the public.

Thus, the final allocation methodology for the 2020 update of the BCAG RHNP has now been completed and is included in **Attachment #2**. Tables 1 and 2 below are also provided to compare the draft and final allocations. Staff from the consultant team at PlaceWorks will review a PowerPoint presentation providing an overview of the final allocation methodology during the meeting.

A complete draft RHNP document has also been completed and is the subject of agenda item #9 at today's meeting.

**Table 1. Draft Methodology Allocation**

Jurisdiction	Very Low		Low		Moderate		Above Moderate		Total
	%	HU	%	HU	%	HU	%	HU	HU
City of Biggs	45.6%	37	0.0%	-	15.5%	13	38.9%	31	81
City of Chico	31.6%	1,101	14.5%	506	22.3%	776	31.7%	1,104	3,488
City of Gridley	34.4%	118	11.8%	41	9.0%	31	44.8%	154	344
City of Oroville	27.0%	169	0.7%	4	12.0%	75	60.3%	377	625
Town of Paradise	5.3%	382	5.2%	374	18.4%	1,319	71.1%	5,105	7,180
Unincorporated	7.1%	271	9.6%	362	26.3%	996	57.0%	2,159	3,788
<b>County Total</b>	<b>13.4%</b>	<b>2,078</b>	<b>8.3%</b>	<b>1287</b>	<b>20.7%</b>	<b>3,209</b>	<b>57.6%</b>	<b>8,931</b>	<b>15,506</b>
<b>Overall HCD Requirement</b>	<b>13.4%</b>	<b>2,078</b>	<b>8.3%</b>	<b>1287</b>	<b>21.7%</b>	<b>3,210</b>	<b>57.6%</b>	<b>8,931</b>	<b>15,506</b>

**Table 2. Final Methodology Allocation**

Jurisdiction	Very Low		Low		Moderate		Above Moderate		Total
	%	Housing Units	%	Housing Units	%	Housing Units	%	Housing Units	Housing Units
City of Biggs	44.4%	36	1.2%	1	14.8%	12	39.5%	32	81
City of Chico	31.6%	1,101	14.5%	507	22.1%	770	31.8%	1,110	3,488
City of Gridley	34.2%	118	11.9%	41	8.7%	30	45.2%	156	344
City of Oroville	27.4%	171	1.0%	6	11.7%	73	60.0%	375	625
Town of Paradise	5.3%	383	5.2%	374	18.4%	1,319	71.1%	5,103	7,179
Unincorporated	7.2%	272	9.5%	361	26.3%	998	56.9%	2,157	3,788
<b>County Total</b>	<b>13.4%</b>	<b>2,081</b>	<b>8.3%</b>	<b>1,290</b>	<b>20.7%</b>	<b>3,202</b>	<b>57.6%</b>	<b>8,933</b>	<b>15,506</b>
<b>Overall HCD Requirement</b>	<b>13.4%</b>	<b>2,081</b>	<b>8.3%</b>	<b>1,290</b>	<b>20.7%</b>	<b>3,202</b>	<b>57.6%</b>	<b>8,933</b>	<b>15,506</b>

**STAFF RECOMMENDATION:** BCAG staff recommends the Board approve the final allocation methodology for the 2020 update of the BCAG RHNP.

Key Staff: Chris Devine, Planning Manager  
 Brian Lasagna, Regional Analyst

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

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October 9, 2020

Jon Clark, Executive Director  
Butte County Association of Governments  
326 Huss Dr. Suite 150  
Chico, CA 95928

Dear Executive Director Jon Clark:

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

Thank you for submitting the draft Butte County Association of Governments (BCAG) 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 BCAG RHNA methodology begins with the total regional determination provided by HCD and separates it into two methodologies to allocate the full determination: regular growth and housing need (6,703) and fire rebuild units (8,803).

For regular growth and housing need, the draft BCAG methodology uses the Regional Transportation Plan (RTP) and five weighted factors—transit, jobs, wildfire risk, agricultural and forest land preserves, and opportunity—to determine each jurisdiction's total RHNA number. The methodology makes several adjustments to rebalance the distribution among the income categories of RHNA.

For fire rebuild, the draft BCAG methodology allocates units to the two jurisdictions—Unincorporated Butte County and Paradise—that lost housing units in the Camp fire. The allocation is based on each jurisdiction's share of lost housing units. RHNA units are distributed among the income categories of RHNA based on actual unit loss. The fire rebuild units represent the expected rebuild during the housing element cycle and account for 60 percent of the housing units destroyed in the Camp Fire.

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**HCD has completed its review of the methodology and finds that the draft BCAG RHNA Methodology furthers the five statutory objectives of RHNA conditional upon small revisions.**<sup>1</sup> HCD commends BCAG for including factors in the draft methodology that augment the base allocation in a manner which directs units toward jurisdictions with more transit, jobs, and areas of high opportunity. In the interest of furthering RHNA statutory objective 1 (to promote a mix of affordability) and statutory objective 4 (to balance income distributions), the draft BCAG methodology made adjustments that resulted in no lower income units for the City of Biggs. A minimal modification is needed to meet the requirement from statutory objective 1 that each jurisdiction receive an allocation of units for low- and very-low income units.

Below is a brief 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.*

To further this objective, the methodology must be revised to ensure the City of Biggs receives an allocation of low-income units, but is otherwise furthering the requirements of this objective. The methodology generally allocates larger shares of lower income RHNA to jurisdictions that experience higher rates of housing cost burden and higher rents. For example, the Cities of Gridley and Chico have the highest share of lower-income cost burdened households and receive the highest percentage of lower-income RHNA units. The three jurisdictions with the highest rent in the region also receive the three largest lower-income RHNA allocations.

*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 BCAG methodology generally encourages a more efficient development pattern. The five factors included in the methodology direct more housing units to areas with lower vehicle miles traveled (VMT) and more accessible jobs and transit. For example, the jurisdictions with the lowest annual household VMT receive the most RHNA and jobs access also aligns with the RHNA allocation well. While the City of Paradise and unincorporated Butte County receive additional allocations to account for their expected rebuilds, it is worth noting that of the 14,639 homes lost in these two jurisdictions during the Camp Fire, only 8,803 homes are expected to be rebuilt in these jurisdictions over the course of the housing element cycle.

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<sup>1</sup> This finding is conditionally based on the methodology being revised to include an allocation of low-income units to the City of Biggs to meet statutory requirement that each jurisdiction receive an allocation of units for low- and very low-income households (Government Code Section 65584(d)(1)). Further, while HCD finds this methodology conditionally compliant, applying this methodology to another region or cycle may not necessarily further the statutory objectives as housing conditions and circumstances may differ.

The regular growth and housing need RHNA of 6,703 units is directed by the regional transportation plan and adjustment factors that direct that need toward infill areas near jobs and transit. HCD finds that the methodology furthers statutory objective 2 as proposed, and would be open to the prospect of BCAG increasing the weighting of the five adjustment factors (transit, jobs, wildfire risk, agricultural and forest land preserves, and opportunity) to further this objective beyond what is proposed in the draft methodology.

*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 BCAG methodology generally allocates more RHNA units to jurisdictions with more jobs and allocates more RHNA units to jurisdictions with a higher jobs-housing imbalance. For instance, under this draft methodology the City of Chico represents 52.6 percent of the region's job share and would receive 52 percent of the region's regular growth and housing need RHNA allocation.

*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.*

This objective is furthered by the adjustments made to rebalance allocated units among the income categories. For instance, Oroville currently has the largest percentage of lower income households and receives the smallest percentage of lower income RHNA units. The adjustments generally move the region towards planning for a more even distribution of lower-income households. BCAG's adjustments toward a more equitable distribution will increase housing planning for low- and very-low-income households in higher income communities.

*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.*

HCD supports the inclusion of the [TCAC/HCD Opportunity Maps](#) in the draft BCAG RHNA methodology. Using both opportunity scores and childhood poverty data, the methodology generally directs more lower income RHNA to higher resourced areas. For instance, Chico is the highest resourced jurisdiction in the region and also receives the largest allocation of lower income RHNA units. Conversely, the lowest resourced area (as defined by the combined opportunity and child poverty indices) receives the lowest lower-income RHNA units as a percentage of its total RHNA allocation.

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HCD appreciates the active role of BCAG staff in providing data and input throughout the draft BCAG RHNA methodology development and review period. HCD especially thanks Brian Lasagna, Chris Devine, Andrea Howard, and David Early for their significant efforts and assistance.

HCD looks forward to continuing our partnership with BCAG to assist its member jurisdictions to meet and exceed the planning and production of the region's housing need.

Support opportunities available for the BCAG region this cycle include, but are not limited to:

- SB 2 Planning Technical Assistance
- Regional and Local Early Action Planning grants
- SB 2 Permanent Local Housing Allocation

If HCD can provide any additional assistance please contact Megan Kirkeby, Deputy Director, [megan.kirkeby@hcd.ca.gov](mailto:megan.kirkeby@hcd.ca.gov).

A handwritten signature in black ink, appearing to read 'MK', with a stylized flourish at the end.

Megan Kirkeby  
Deputy Director

# BUTTE COUNTY ASSOCIATION OF GOVERNMENTS

## 6TH CYCLE REGIONAL HOUSING NEEDS PLAN

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### 1. FINAL ALLOCATION METHODOLOGY

This section provides a description of the adopted methodology to allocate housing units by income level among the BCAG member jurisdictions, the process for developing the methodology, and how the methodology addresses the statutory requirements for furthering the five RHNA objectives identified in Government Code Section 65584(d). The methodology consists of two primary components: the spatial allocation of units to each jurisdiction and the distribution of units by income tier. Following is an overview of the methodology for each component.

#### 1.1 UNIT ALLOCATION METHODOLOGY

The unit allocation methodology applies five weighted factors to distribute the regular growth allocation across BCAG’s six-member jurisdictions. The fire rebuild allocation is separately assigned to the jurisdictions that lost units in the Camp Fire (the Town of Paradise and unincorporated Butte County) based on the total rebuild units assigned and each jurisdiction’s proportionate loss of units in the fire.

#### REGULAR GROWTH ALLOCATION

To distribute the regular growth allocation among the jurisdictions, the methodology starts with assigning a base allocation, which is the product of the jurisdictions’ forecasted share of regular growth in the 2018–2040 BCAG Growth Forecast, provided in Appendix 5, and the regular growth allocation. The base allocation establishes a foundational allocation that recognizes the significant capacity differences between jurisdictions and provides for an allocation that is suitable for each jurisdiction’s existing size. For example, the most populous city in the region, Chico, has approximately 57 times more housing units than the least populous city, Biggs. The 2018–2040 BCAG Growth Forecast reflects these differences and attributes 45 percent of anticipated regional housing growth to Chico and only 1.3 percent to Biggs. These projections represent a local housing unit increase of 31.2 percent in Biggs and only 18.7 percent in Chico, so Biggs (as an example) is still receiving a larger percentage of the base allocation than Chico relative to its current housing total. The base allocation is shown in **Table 1**.

**TABLE 1 BASE ALLOCATION**

Jurisdiction	Jurisdictional Percent of Regional Growth in 2018–2040 Growth Forecast	Base Allocation
Biggs	1.3%	87
Chico	45.0%	3,016
Gridley	5.4%	362
Oroville	9.7%	650
Paradise	5.6%	376
County Unincorporated	33.0%	2,212
<b>Total</b>	<b>100%</b>	<b>6,703</b>

#### *Allocation Factors*

Using the base allocation as a foundation, the draft methodology adjusts each jurisdiction’s regular growth allocation using five weighted factors.



## BUTTE COUNTY ASSOCIATION OF GOVERNMENTS 6TH CYCLE REGIONAL HOUSING NEEDS PLAN

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In preparation for choosing the allocation factors, BCAG collected and analyzed more than 20 data layers, including:

- Jobs and jobs-housing balance
- Opportunities and constraints to development in each jurisdiction
- Preserved and protected land
- Designated agricultural land
- The distribution of household growth in the RTP (the base allocation)
- Cost-burdened households
- Overcrowding
- Homelessness
- Loss of housing units from the Camp Fire
- Wildfire risk
- Flood and erosion hazards
- Protected and/or sensitive environmental lands
- Vehicle miles traveled
- Transit connectivity
- Affordable housing stock
- HCD/Tax Credit Allocation Committee (TCAC) Opportunity Maps
- Childhood poverty status

After thoughtful consideration of all factors, the BCAG Board, with support from the PDG, agreed to use Transit Connectivity, Jobs, Wildfire Risk, Agriculture and Forest Land Preserves, and a combined HCD/TCAC Opportunity Maps and Childhood Poverty Status measure of opportunity as the factors to adjust the base allocation. Each of these measures is shown in **Table 2** and described in more detail herein.

**TABLE 2 PROPOSED FACTORS AND SCALED SCORES**

Jurisdiction	Transit Connectivity	Jobs	Wildfire Risk	Agriculture and Forest Land Preserves	Opportunity		
					HCD/TCAC Opportunity Map	Percent of Children Living Above the Poverty Level	Combined HCD/TCAC and Childhood Poverty
Biggs	0.57	0.50	1.50	1.43	0.86	0.83	0.78
Chico	1.50	1.50	1.48	1.24	1.50	1.21	1.50
Gridley	0.65	0.54	1.50	1.34	0.87	1.16	1.02
Oroville	1.07	0.76	1.46	1.32	0.79	0.50	0.50
Paradise	0.78	0.58	0.50	1.50	0.57	1.50	1.05
Unincorporated County	0.50	0.74	1.06	0.50	0.50	1.27	0.84

**Transit Connectivity**

Availability of transit service is a key consideration in siting housing because transit allows residents to access jobs and services without generating vehicle trips. The Transit Connectivity factor is based on the Transit Connectivity Score prepared by AllTransit for each incorporated jurisdiction and the County as a whole. The Transit Connectivity Score is a measure of how connected the average household member is to the availability of a transit ride and accessibility to jobs using transit. More information on the Transit Connectivity score and how it is developed is available in the [AllTransit Methods](#) document. BCAG consultants used the incorporated jurisdictions’ and County-wide scores to derive a transit connectivity score for the unincorporated County.

**Jobs**

The availability of jobs in a community is an important consideration in siting housing, since residents need access to jobs for economic reasons, and the proximity of jobs to residents minimizes travel time and vehicle miles traveled (VMT). Current regional job count data is sourced from the California Employment Development Department (EDD). The distribution of jobs per jurisdiction was determined using each jurisdiction’s proportion of regional jobs from the latest available (2017) Longitudinal Employer-Household Dynamics (LEHD) OnTheMap estimates. Because this distribution predated the 2018 Camp Fire, the jurisdictional jobs distribution was then adjusted to account for the fire impact and calculate the resulting Jobs Factor.

**Wildfire Risk**

The 2018 Camp Fire was the deadliest wildfire in the state’s history and destroyed more than 14,000 homes in Butte County. The Wildfire Risk Factor uses 2020 CalFire measures of high- and very high-wildfire risk and geographic information system (GIS) analysis to determine what percentage of each jurisdiction’s land is not at a high- or very-high risk of wildfire. The intent of this factor is to prioritize the construction of homes in jurisdictions with a lower risk of wildfire.

### ***Agriculture and Forest Land Preserves***

Agriculture is Butte County's number one industry; in 2018, it produced more than \$680 million worth of farming products. The region has a deep commitment to protecting its agriculture lands. In addition, the region has two national forests preserved from development. The methodology used GIS analysis to determine the percentage of land in each jurisdiction not designated for agriculture or preserved as part of a national forest. The resulting percentage of land available for development makes up the Agriculture and Forest Land Preserves Factor.

### ***Opportunity***

BCAG and member jurisdictions considered both HCD/TCAC Opportunity Maps and Percent of Children Living Above the Poverty Level as potential factors to support the equitable distribution of housing units.

- The HCD/TCAC Opportunity Maps calculate opportunity scores at the census block group level using 21 indicators: Income, Adult Educational Attainment, Labor Force Participation, Job Proximity, Median Home Value, 12 environmental health/pollution indicators, 4th Grade Math Proficiency, 4th Grade Reading Proficiency, High School Graduation Rate, and Students Living Above the Federal Poverty Level.
- The Percent of Children Living Above Poverty Level measure uses 2013–2018 ACS data prepared by the U.S. Census Bureau. This measure was considered because it has been recognized as a strong indicator for evaluating the level of economic stability and opportunity for families with children in a population. In addition, childhood poverty status has implications for positive life outcomes, as recognized by the similar Students Living Above Poverty Level indicator in the HCD/TCAC Opportunity measure.

BCAG determined that a combination of these two indicators would be the best measure of economic opportunity, because neither of them seemed to represent conditions in Butte County on its own. For example, the Town of Paradise, which scored second lowest in the County using the TCAC/HCD measure, is generally recognized as offering greater opportunity than many other jurisdictions in the county; this fact is illustrated by the Percent of Children Living Above Poverty indicator.

### ***Factor Normalization***

Each of these five selected factors is normalized on a scale of 0.5 to 1.5. The normalized scale serves to support ease of computation and comparison of factors among each other, and the range of the scale (0.5 to 1.5) is large enough to impact the distribution of housing units by adjusting them up (any score between 1 and 1.5) or down (any score between 0.5 and 1) from the base allocation, but not so large that the base allocation becomes insignificant. All factors are configured so that higher scores indicate that the jurisdiction is more favorable to support housing as far as that factor is concerned, while lower scores indicate less-favorable conditions for housing. For example, jurisdictions with better transit connectivity receive higher scores for the Transit Connectivity factor and jurisdictions with high-fire risk receive a lower score for the Wildfire Risk factor resulting in more housing units assigned to jurisdictions with better transit connectivity and lower risk of wildfire.

For the Opportunity factor, which consists of two inputs, BCAG and its member jurisdictions agreed to add the normalized (0.5 to 1.5) scores of the two measures and re-normalize the sum to create a new, combined measure of opportunity. The combination addresses concentrations of poverty and maximizes access to opportunity, as measured by HCD/TCAC.

**Factor Weighting**

Following selection of the factors, the draft methodology assigns weights to each. These weights establish what percentage of the total allocation will be distributed based on that factor. Each of the factors advance important priorities in the BCAG region and were therefore assigned an equal weight of 10 percent each so that 50 percent of the allocation is determined by the five factors. The remaining 50 percent of units are allocated in accordance with the Regional Growth Forecast and the base allocation. This supports consistency with the Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS), as well as member jurisdiction General Plans and favors a more balanced distribution of growth, rather than concentrating a vast majority in the City of Chico. All weights are summarized below.

- Combined TCAC/HCD Opportunity and Childhood Poverty Status Factor: 10-percent weight
- Transit Connectivity: 10-percent weight
- Number of Jobs: 10-percent weight
- Wildfire Risk: 10-percent weight
- Agriculture and Forest Land Preserves: 10-percent weight
- Base Allocation: 50-percent weight

**Table 3** shows the resulting factor-adjusted allocations for each jurisdiction.

**TABLE 3 BASE ALLOCATION AND FACTOR ADJUSTMENT**

Jurisdiction	Base Allocation	Factor-Adjusted Allocation	Net Change
Biggs	87	81	(6)
Chico	3,016	3,488	472
Gridley	362	345	(17)
Oroville	650	625	(25)
Paradise	376	342	(34)
Unincorporated	2,212	1,822	(390)
<b>Total</b>	<b>6,703</b>	<b>6,703</b>	<b>—</b>

**FIRE REBUILD ALLOCATION**

Once the regular growth allocation has been distributed to each jurisdiction, the fire rebuild allocation is added to reach the total allocation for all jurisdictions. As described previously, this step simply distributes the units explicitly assigned by HCD as fire rebuild units to the two jurisdictions that lost housing units in the Camp Fire, based on each jurisdiction’s proportion of total housing units lost. **Table 4** shows the combination of the factor-adjusted regular growth allocation with the fire rebuild allocation to create the cumulative total allocation.

**TABLE 4 FIRE REBUILD AND FINAL ALLOCATION**

Jurisdiction	Factor-Adjusted Allocation	Fire Allocation	Total Allocation
Biggs	81	—	81
Chico	3,488	—	3,488
Gridley	345	—	345
Oroville	625	—	625
Paradise	342	6,837	7,179
Unincorporated	1,822	1,966	3,788
<b>Total</b>	<b>6,703</b>	<b>8,803</b>	<b>15,506</b>

## 1.2 INCOME ALLOCATION METHODOLOGY

The regional housing allocation provided by HCD includes both a total number of housing units and a distribution of those units across four affordability tiers: very low-income, low-income, moderate-income, and above-moderate income. Once the overall allocation for each jurisdiction is set, each jurisdiction’s housing unit allocation must be distributed among the four income tiers and the sum allocation in each income tier across all jurisdictions must equal the total amount set by HCD for the entire region. The BCAG regional income tier allocation from HCD is separated into two categories: regular growth and fire rebuild units, which are shown in Table 5.

**TABLE 5 BCAG REGIONAL INCOME TIER ALLOCATION**

Income Level	Regular Growth		Fire Rebuild		All Units Combined	
	Unit Percent	Unit Total	Unit Percent	Unit Total	Unit Percent	Unit Total
Very low	26.4%	1,771	3.5%	310	13.4%	2,081
Low	14.6%	980	3.5%	310	8.3%	1,290
Moderate	15.8%	1,060	24.3%	2,142	20.7%	3,202
Above Moderate	43.1%	2,892	68.6%	6,041	57.6%	8,933
<b>Total</b>	<b>100%</b>	<b>6,703</b>	<b>100.00%</b>	<b>8,803</b>	<b>100%</b>	<b>15,506</b>

**Note:** Due to rounding, percentages may not total precisely.

### REGULAR GROWTH INCOME DISTRIBUTION

The approved methodology uses the following process to distribute the regular growth units by income tier to each jurisdiction. Each numbered step is accompanied by a bulleted description of the justification and relevant background to that step, where appropriate.

1. Determine the current distribution of household income tiers for each jurisdiction.
  - » This step uses data from the 2013–2018 ACS. Though this data predates the 2018 Camp Fire, it was agreed upon by PDG members as the best-available measure of household incomes.

2. Calculate the number of units to allocate to each municipality by income tier, such that they make proportional progress toward an equal distribution of income tiers over the long-term.
  - » The region aims to achieve an equal housing unit income distribution across all jurisdictions; however, the level of change needed is too extreme to reasonably achieve over the eight-year RHNA cycle. Instead, the methodology calculates the increase in units for each income tier needed to have each community match HCD's assigned income tier allocation by the horizon year 2040 and then adjust each municipality's income distribution on a straight-line basis for the eight-year period of the RHNA.
  - » BCAG's member agencies agree that the unincorporated County should not increase its share of low- and very low-income units, and that those units should instead be concentrated in better resourced, incorporated jurisdictions.
  - » Based on the ACS data gathered in step 1, the City of Biggs has already met its share of low-income units needed to achieve an equal distribution by 2040. This would suggest that Biggs should receive a low-income allocation of zero. However, Government Code stipulates that all jurisdictions must receive an allocation of one or more units in both the low- and very low-income tiers, so Biggs is assigned one unit in the low-income tier.
3. Review each jurisdictions' combined allocation of low- and very low-income units to ensure that the combined percentage is less than or equal to the percentage assigned to it in the 5th Cycle. This requires reallocation for Biggs, Chico, Gridley, and Paradise.
  - » This step is in accordance with a practice followed in BCAG's 5th Cycle RHNA. The combined percentage of low- and very low-income units in the 5th Cycle RHNA were between 37.8 and 45.4 percent of units for all jurisdictions.
4. As a final step, the methodology makes adjustments to ensure that each jurisdiction's sum allocation across income tiers equals the jurisdiction's total regional allocation and that the county-wide allocation in each income tier is equal to the amount set by HCD. Note that this process also results in revised combined allocations of low- and very low-income units to Biggs, Chico, Gridley, and Paradise, whose percentages are greater than the percentages assigned in the 5th Cycle.

**BUTTE COUNTY ASSOCIATION OF GOVERNMENTS  
6TH CYCLE REGIONAL HOUSING NEEDS PLAN**

The final distribution of units across all income tiers is shown in **Table 6**.

**TABLE 6 INCOME DISTRIBUTIONS BY JURISDICTION**

Jurisdiction	Very Low		Low		Moderate		Above Moderate		Total Housing Units
	%	Housing Units	%	Housing Units	%	Housing Units	%	Housing Units	
City of Biggs	44.4%	36	1.2%	1	14.8%	12	39.5%	32	81
City of Chico	31.6%	1,101	14.5%	507	22.1%	770	31.8%	1,110	3,488
City of Gridley	34.2 %	118	11.9%	41	8.7%	30	45.2%	156	345
City of Oroville	27.4%	171	1.0%	6	11.7%	73	60.0%	375	625
Town of Paradise	21.3%	73	18.7%	64	9.4%	32	50.6%	173	342
Unincorporated	14.9%	272	19.8%	361	7.8%	143	57.4%	1,046	1,822
<b>County Total</b>	<b>26.4%</b>	<b>1,771</b>	<b>14.6%</b>	<b>980</b>	<b>15.8%</b>	<b>1,060</b>	<b>43.1%</b>	<b>2,892</b>	<b>6,703</b>
<b>HCD Requirement</b>	<b>26.4%</b>	<b>1,771</b>	<b>14.6%</b>	<b>980</b>	<b>15.8%</b>	<b>1,060</b>	<b>43.1%</b>	<b>2,892</b>	<b>6,703</b>

**FIRE REBUILD ALLOCATION INCOME DISTRIBUTION**

To distribute the fire rebuild units by income tier between the Town of Paradise and the County, the methodology assigns a rebuild share proportionate with the actual loss of units in each jurisdiction by income tier. This distribution is shown in **Table 7**.

**TABLE 7 FIRE REBUILD ALLOCATION INCOME DISTRIBUTION**

Jurisdiction	Very Low		Low		Moderate		Above Moderate		Total Housing Units
	%	Housing Units	%	Housing Units	%	Housing Units	%	Housing Units	
Town of Paradise	3.5%	310	3.5%	310	14.6%	1,287	56.0%	4,930	6,838
Unincorporated	0.0%	—	0.0%	0	9.7%	855	12.6%	1,111	1,965
<b>County Total</b>	<b>3.5%</b>	<b>310</b>	<b>3.5%</b>	<b>310</b>	<b>24.3%</b>	<b>2,142</b>	<b>68.6%</b>	<b>6,041</b>	<b>8,803</b>

**TOTAL ALLOCATION BY INCOME TIER**

As a final step, the jurisdictional allocation by income tier for regular growth and fire rebuild are combined, yielding the total allocation for each jurisdiction in each income tier, shown in **Table 8**. The final row in **Table 8** shows the overall HCD requirement for comparison.

**TABLE 8 TOTAL ALLOCATION BY INCOME TIER**

Jurisdiction	Very Low		Low		Moderate		Above Moderate		Total
	%	Housing Units	%	Housing Units	%	Housing Units	%	Housing Units	Housing Units
City of Biggs	44.4%	36	1.2%	1	14.8%	12	39.5%	32	81
City of Chico	31.6%	1,101	14.5%	507	22.1%	770	31.8%	1,110	3,488
City of Gridley	34.2%	118	11.9%	41	8.7%	30	45.2%	156	344
City of Oroville	27.4%	171	1.0%	6	11.7%	73	60.0%	375	625
Town of Paradise	5.3%	383	5.2%	374	18.4%	1,319	71.1%	5,103	7,179
Unincorporated	7.2%	272	9.5%	361	26.3%	998	56.9%	2,157	3,788
<b>County Total</b>	<b>13.4%</b>	<b>2,081</b>	<b>8.3%</b>	<b>1,290</b>	<b>20.7%</b>	<b>3,202</b>	<b>57.6%</b>	<b>8,933</b>	<b>15,506</b>
<b>Overall HCD Requirement</b>	<b>13.4%</b>	<b>2,081</b>	<b>8.3%</b>	<b>1,290</b>	<b>20.7%</b>	<b>3,202</b>	<b>57.6%</b>	<b>8,933</b>	<b>15,506</b>

### 1.3 STATUTORY OBJECTIVES

In compliance with California law, the final methodology furthers all statutory objectives, as outlined herein.

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

As described above, the methodology for allocating units in each income tier supports a redistribution of units, such that the jurisdictions that currently have a lesser share of low- and very low-income units receive a larger allocation. The methodology allocates units in all four income tiers to each of the region’s six jurisdictions.

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

The methodology places the preponderance of units in incorporated, urbanized municipalities to support infill and socioeconomic equity. Moreover, two of the factors used in the methodology prioritize transit connectivity and proximity to jobs to encourage efficient development patterns and support efforts to minimize VMT and greenhouse gas (GHG) emissions. The methodology’s incorporation of the Growth Forecast used in the RTP further supports consistency of the methodology with planning efforts to achieve regional GHG emission-reduction targets. Additionally, the Agriculture and Forest Land Preserves factor prioritizes locating housing in areas not preserved or dedicated to agricultural uses or open space.



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

A typical target relationship between jobs and housing is between 1.3 and 1.6 jobs for every one housing unit. No jurisdiction in the BCAG region has achieved this balance. Two jurisdictions (Paradise and Oroville) have an excess of jobs, although these estimates do not account for the Camp Fire so the number of jobs in Paradise has likely decreased. All other jurisdictions have an oversupply of housing units compared to jobs, as depicted in **Table 9**.

**TABLE 9 JOBS TO HOUSING BALANCE**

Jurisdiction	Total Jobs	Total Housing Units	Jobs-Housing Balance
Biggs	237	696	0.34
Chico	49,238	41,738	1.18
Gridley	2,252	2,540	0.89
Oroville	12,879	7,391	1.74
Paradise	4,226	1,766	2.39
County Unincorporated	11,869	31,991	0.37

The jobs-housing fit, or relationship of low-wage jobs to very low- and low-income households, shows similar but slightly different results. Looking only at existing low- and very low-income households and low-wage jobs located in the jurisdictions, Oroville (2.24 low-wage jobs to low-income households), Chico (2.13 low-wage jobs to low-income households), and Gridley (1.69 low-wage jobs to low-income households) show a need for more low- and very low-income housing in this respect.

The allocation methodology addresses these issues as follows:

1. The fire rebuild allocation addresses the pre-Camp Fire imbalance of jobs to housing units in Paradise by assigning a large number of units to that jurisdiction.
2. Oroville’s higher number of jobs and better transit access, reflected in the Jobs and Transit Connectivity Factors, support the allocation of more housing units to Oroville. However, Oroville’s low Opportunity Score suggests that fewer units should be assigned to it. Further, Oroville’s existing low- and very low-income households as a percentage of total households in the city exceeds the regional average, so, in accordance with Objective 4, the city’s percentage allocation of low- and very low-income households is less than the percentage allocation to other jurisdictions.
3. Gridley is just slightly outside of the preferred jobs-housing fit and is allocated a sufficient share of low- and very low-income housing units to encourage a shift to within the desired range.
4. Chico’s significant allocation of housing units supports a better jobs-housing balance overall. Further, the City’s proportionately large allocation of the region’s low- and very low-income housing units supports an improved jobs-housing fit in Chico.

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

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

**Objective 5.** *Affirmatively furthering fair housing.*

BCAG addresses the objective of affirmatively furthering fair housing by including the HCD/TCAC Opportunity Analysis and Children Living in Poverty as factors in the methodology.

The methodology results in a concentration of housing units in the City of Chico, which offers by far the greatest opportunity in the county, as defined by the HCD/TCAC Opportunity Maps. Chico is one of only two jurisdictions in the county to achieve a positive score (13.14) when the TCAC/HCD Opportunity Map census block group data is aggregated on a jurisdictional scale. The only other jurisdiction to receive a positive score, the City of Gridley, scored only 0.22, and all other jurisdictions scored below zero. Thus, the placement of a preponderance of units in the City of Chico is a strong step toward affirmatively furthering fair housing in the BCAG region.

BUTTE COUNTY ASSOCIATION  
OF GOVERNMENTS



BOARD OF DIRECTORS MEETING  
ITEM #5



## BCAG BOARD OF DIRECTORS

## Item #5 Action

October 22, 2020

### **APPROVAL OF RESOLUTION 2020/2021-05 FOR ALLOCATION OF REGIONAL EARLY ACTION PLANNING (REAP) GRANT FUNDS**

**PREPARED BY:** Chris Devine, Planning Manager

**ISSUE:** A resolution was approved by the BCAG Board of Directors at the February 2020 meeting, accepting a 25% “advance allocation” of Regional Early Action Planning (REAP) grant funds. A new resolution must now be approved by the Board to receive the remaining 75% of BCAG’s REAP funding allocation.

**DISCUSSION:** BCAG staff is recommending the BCAG Board of Directors approve resolution 2020/2021-05, which must be submitted with the application package to receive the allocation of funding.

The REAP funds are allocated to Councils of Governments throughout California according to a population-based formula; BCAG’s total allocation is \$883,334. Of this total amount, \$220,833 was received in March 2020 as part of the 25% “advance allocation”. These funds were used by BCAG staff to assist with preparing the 2020 update of the BCAG Regional Housing Needs Plan (RHNP). This leaves \$662,501 in remaining REAP funds. Approval of resolution 2020/2021 will allow BCAG staff to submit the required application to receive these funds.

The REAP grant program allows BCAG to suballocate funds to member jurisdictions for grant-eligible projects. BCAG staff has been coordinating with member jurisdiction planning staff through the Planning Directors Group (PDG) meetings to determine possible projects to fund. Through this, the following projects (or components of these projects) have been identified for possible funding with the remaining 75% of REAP funding:

1. City of Chico/Butte County: North Chico Specific Plan Area Public Infrastructure Plan and California Environmental Quality Act (CEQA) Document
2. Butte County/Lake Oroville Area Public Utility District (LOAPUD): Planning and Design Tasks for Las Plumas Area Gravity Sewer Interceptor in Las Plumas Area in Southern Oroville
3. City of Oroville: Temporary Associate Planner position in Planning and Building Department

## BCAG Board of Directors – Item #5

October 22, 2020

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4. City of Biggs: Biggs Phased Annexation Plan & Zoning Code Amendments
5. BCAG: Grant Administration Costs

The projects nominated by BCAG member jurisdictions all meet the grant program requirements (see below). BCAG staff is continuing to coordinate with member jurisdictions to develop detailed task descriptions, including specific funding amounts, and expects to have this finalized in November. An agenda item will be provided at the December BCAG Board meeting providing more detailed information on final tasks and funding allocations for each project.

### Background

Senate Bill (SB) 113 and Assembly Bill (AB) 101 resulted in funding allocations available to Councils of Government such as BCAG through a grant program called Local Government Planning Support Grants Program (LGPSGP), later to be known as the Regional Early Action Planning (REAP) grant program. This program is being administered by the California Department of Housing and Community Development (HCD), and its primary goal is to accelerate housing production in California by cities and counties and facilitate compliance with the Regional Housing Needs Assessment administered by HCD and BCAG.

The Regional Early Action Planning grant program provides one-time allocations of funding to Councils of Governments (COGs) and Multiagency Working Groups in the total amount of \$125 million. These funds are intended to be used to achieve the grant program objectives which include:

- Increasing planning efforts related to housing.
- Facilitating local housing production through technical assistance and preparation and adoption of planning documents.
- Identifying current best practices at the regional and statewide level that promote sufficient supply of housing affordable to all income levels, and a strategy for increasing adoption of these practices at the regional level, where viable.
- Developing an education and outreach strategy to inform local agencies of the need and benefits of taking early action related to the sixth cycle regional housing need allocation.
- Facilitating compliance by the local agencies with the next update (6<sup>th</sup> cycle) of the Regional Housing Needs Assessment to accelerate housing production through process improvements.

**STAFF RECOMMENDATION:** Staff recommends the BCAG Board approve resolution 2020/2021-05.

Key Staff: Chris Devine, Planning Manager  
Jon Clark, Executive Director



**BUTTE COUNTY ASSOCIATION OF GOVERNMENTS  
RESOLUTION NO 2020/2021-05**



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**RESOLUTION OF THE BUTTE COUNTY ASSOCIATION OF GOVERNMENTS  
CONSENTING TO ADOPT AND RATIFY THE FOLLOWING RESOLUTION:**

The Board of Directors of the Butte County Association of Governments (“BCAG” or “Applicant”) hereby consents to, adopts and ratifies the following resolution:

**WHEREAS**, the State of California (the “State”), Department of Housing and Community Development (“Department”) is authorized to provide up to \$125,000,000 under the Local Government Planning Support Grants Program (LGPSGP) to Councils of Governments and other Regional Entities (“Applicant”) (as described in Health and Safety Code section 50515.02).

**WHEREAS**; the Department issued a Notice and Opportunity for Funding Allocation Application (NOFA) on February 18, 2020 (Local Government Planning Support Grants Program);

**WHEREAS** Applicant is a Council of Governments or Regional Entity eligible to apply for an allocation pursuant to Health and Safety Code section 50515.02(a) to develop and accelerate the implementation of the requirements contained in the Council of Governments or Regional Entity’s application pursuant to Health and Safety Code section 50515.02(d)(1) including the development of an education and outreach strategy related to the sixth cycle regional housing need allocation.

**WHEREAS** the Department shall approve the allocation request, subject to the terms and conditions of Eligibility, NOFA, which includes the guidelines and program requirements, and the Standard Agreement by and between the Department and Local Government Planning Support Grant Recipients;

**NOW THEREFORE BE IT RESOLVED THAT:**

The Butte County Association of Governments is hereby authorized pursuant to Health and Safety Code section 50515.02(a) and directs the Executive Director to request an allocation pursuant to the Department’s calculation in accordance with the population estimates consistent with the methodology described in subdivision (a) of Section 50515.03. Each council of governments or other regional entity may, in consultation with the Department and consistent with program requirements, determine the appropriate use of funds or suballocations within its boundaries to appropriately address its unique housing and planning priorities.

The BCAG Executive Director is authorized to execute the **Allocation Application**, on behalf of the Butte County Association of Governments as required by the Department for receipt of LGPSGP funds by submitting the following information:

- (a) An allocation budget for the funds provided pursuant to this section.
- (b) The amounts retained by the council of governments, regional entity, or county, and any suballocations to jurisdictions.
- (c) An explanation of how proposed uses will increase housing planning and facilitate local housing production.
- (d) Identification of current best practices at the regional and statewide level that promote sufficient supply of housing affordable to all income levels, and a strategy for increasing adoption of these practices at the regional level, where viable.
- (e) An education and outreach strategy to inform local agencies of the need and benefits of taking early action related to the sixth cycle regional housing need allocation.

When BCAG receives its allocation of LGPSP funds in the authorized maximum amount of \$883,334 from the Department pursuant to the above referenced Allocation Application, it represents and certifies that it will use all such funds only for eligible activities as set forth in Health and Safety Code section 50515.02(e), as approved by the Department and in accordance with all LGPSP requirements, NOFA guidelines, all applicable state and federal statutes, rules, regulations, and the Standard Agreement executed by and between the Applicant [Council of Government/Regional Entity] and the Department.

The BCAG Executive Director is authorized to enter into, execute and deliver a State of California Standard Agreement for the amount of \$662,501 (the amount of funds remaining after BCAG's 25% advance allocation) and any and all other documents required or deemed necessary or appropriate to evidence and secure the LGPSP allocation, BCAG's obligations related thereto and all amendments the Department deems necessary and in accordance with LGPSP.

**PASSED AND ADOPTED** by the Butte County Association of Governments Board of Directors, State of California, at a regular meeting of said Board held on the 22<sup>nd</sup> day of October 2020 by the following vote:

AYES:

NOES:

ABSENT:

ABSTAIN:

**APPROVED:**

\_\_\_\_\_  
BILL CONNELLY, CHAIR  
BUTTE COUNTY ASSOCIATION OF GOVERNMENTS

**ATTEST:**

\_\_\_\_\_  
ANDY NEWSUM, DEPUTY DIRECTOR  
BUTTE COUNTY ASSOCIATION OF GOVERNMENTS



BUTTE COUNTY ASSOCIATION  
OF GOVERNMENTS



BOARD OF DIRECTORS MEETING  
ITEM #6



## BCAG BOARD OF DIRECTORS

## Item #6 Action

October 23, 2020

### APPROVAL OF 2020/21 UNMET TRANSIT NEEDS ASSESSMENT AND FINDINGS

**PREPARED BY:** Jim Peplow, Senior Planner

**ISSUE:** BCAG is required to prepare an annual Unmet Transit Needs Assessment as the administrator of Transportation Development Act (TDA) funds for Butte County.

**DISCUSSION:** Each year, BCAG must identify any public unmet transit needs that may exist in Butte County in order to receive state funding. If unmet transit needs are found, a further determination must be made as to whether those needs are reasonable to meet. All unmet transit needs that are reasonable to meet must be satisfied before TDA funds are expended for non-transit uses, such as streets and roads.

Testimony was collected during a 30-day outreach period in March 2020 where the public was invited to provide input via mail, email, phone, as well as an online comment from on the B-Line web site. This outreach period culminated with a public hearing before the BCAG Board of Directors. This 30-day period to gather comments, along with the final public hearing, was promoted in local newspapers, on all transit buses and on the Internet at both the BCAG and B-Line web site, as well as on the Butte Regional Transit Facebook page. In addition, the notice was emailed to community social service agencies.

After comments were received, they were compiled into an analysis report. Linked below, for the Board's review, is the Draft *Unmet Transit Needs Assessment - 2020/2021*. The Assessment examines transit dependent groups, adequacy of existing transit services, a detailed summary of the public testimony received during this year's outreach process, and staff's analysis of whether the testimony meets the definitions of unmet transit needs and reasonable to meet. The Assessment can be viewed on the B-Line web site at: <http://www.blinetransit.com/Resources/Unmet-Transit-Needs-Process/index.html>

The Assessment has been reviewed by the Social Services Transportation Advisory Council (SSTAC), which provides a recommendation for Unmet Transit Needs Findings to the BCAG Board of Directors. At the September 28, 2020 SSTAC meeting, the council unanimously supported staff's recommendation, outlined in further detail below.

**BCAG Board of Directors Item #6**  
**October 22, 2020**  
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Based on the testimony and analysis using the adopted definitions of “unmet transit needs” and “reasonable to meet”, the BCAG Board of Directors is **required** to make one of three findings:

1. There are no unmet transit needs,
2. There are no unmet transit needs that are reasonable to meet,
3. There are unmet transit needs, including needs that are reasonable to meet.

**STAFF RECOMMENDATION:** Based on the testimony received and on staff’s analysis with the adopted definitions of unmet transit needs and reasonable to meet, BCAG staff and the Social Services Transportation Advisory Council (SSTAC) are recommending that the following finding be made by the BCAG Board of Directors:

**There are no unmet transit needs that are reasonable to meet.**

Staff further recommends the Board adopt the Unmet Transit Needs Assessment and Findings for the 2020/21 fiscal year by Resolution 2020/21-04.

Key staff: Jim Peplow, Senior Planner  
Cheryl Massae, Human Resource Manager



BUTTE COUNTY ASSOCIATION OF GOVERNMENTS  
**RESOLUTION NO 2020/2021-04**



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**RESOLUTION OF THE BUTTE COUNTY ASSOCIATION OF GOVERNMENTS  
MAKING FINDINGS REGARDING UNMET TRANSIT NEEDS AFFECTING FISCAL  
YEAR 2020-2021**

**WHEREAS**, Public Utilities Code Section 99401.5 requires that prior to making any allocation of Transportation Development Act funds not directly for public transportation purposes, that any unmet transit needs that are reasonable to meet shall be funded;

**WHEREAS**, the Butte County Association of Governments has adopted definitions of “unmet transit needs” and “reasonable to meet”;

**WHEREAS**, Public Utilities Code Section 99401.5 specifically describes the procedures required prior to making the unmet transit needs findings;

**WHEREAS**, the Butte County Association of Governments has complied with all required procedures, including establishment and consultation with the Social Services Transportation Advisory Council, preparation of an Unmet Transit Needs Assessment, and the solicitation of public input, including a public hearing;

**WHEREAS**, the Butte County Association of Governments is required to make one of three findings:

1. There are no unmet transit needs,
2. There are no unmet transit needs that are reasonable to meet,
3. There are unmet transit needs, including needs that are reasonable to meet;

**WHEREAS**, it has been determined that **there are no unmet transit needs that are reasonable to meet** for B-Line fixed route service;

**NOW THEREFORE BE IT RESOLVED** that based on the definitions of “unmet transit needs” and “reasonable to meet” adopted by the Board of Directors on October 23, 2003 and the 2020/2021 Unmet Transit Needs Assessment, and in accordance with the recommendation of the Social Services Transportation Advisory Council, the Butte County Association of Governments finds that there are no unmet transit need that are reasonable to meet for B-Line fixed route service.

**PASSED AND ADOPTED** by the Butte County Association of Governments on the 23<sup>rd</sup> day of October 2020 by the following vote:

AYES:

NOES:

ABSENT:

ABSTAIN:

**APPROVED:**

\_\_\_\_\_  
BILL CONNELLY, CHAIR  
BUTTE COUNTY ASSOCIATION OF GOVERNMENTS

**ATTEST:**

\_\_\_\_\_  
JON A. CLARK, EXECUTIVE DIRECTOR  
BUTTE COUNTY ASSOCIATION OF GOVERNMENTS

BUTTE COUNTY ASSOCIATION  
OF GOVERNMENTS



BOARD OF DIRECTORS MEETING  
ITEM #7



## BCAG BOARD OF DIRECTORS

## Item #7 Action

October 22, 2020

### **AUTHORIZE EXECUTIVE DIRECTOR TO NEGOTIATE AND EXECUTE AGREEMENT FOR BCAG/BRT OPERATIONS FACILITY ELECTRIC VEHICLE UNDERGROUND CHARGING INFRASTRUCTURE**

**PREPARED BY:** Andy Newsum, Deputy Director

**ISSUE:** Re-circulation of solicitation for qualification and proposal request to design and construct underground electric vehicle charging infrastructure.

**DISCUSSION:** In December of 2018, the California Air Resources Board (CARB) approved regulation and set a statewide goal for public transit agencies to gradually transition to a 100% zero-emission fleet by 2040. Under Work Element 21-308 Butte Regional Transit Zero-Emission Electric Bus Fleet Rollout Plan, BCAG is currently developing the rollout plan describing how Butte Regional Transit will meet this requirement. A crucial element in achieving the goals of the rollout plan is to have an underground electrical infrastructure to serve the robust charging needs of an electric vehicle fleet.

To get charging infrastructure in place by the Fall of 2021, staff circulated a Design/Build Request for Proposal (RFP) solicitation on September 24, 2020. On September 15<sup>th</sup>, 2020, 2 (two) firms attended the mandatory pre - proposal meeting where details of the site and project were discussed. On October 9<sup>th</sup>, 2020, staff received one proposal.

Upon reviewing the proposal, staff has decided to re-circulate the request to get more participation. Staff will review submitted proposals and determine if there is adequate participation and understanding to move forward with a selected team. Following agreement on scope and cost, staff will execute an agreement and begin the design and development of the requested services. Construction of the designed underground infrastructure is expected to occur immediately thereafter in the second quarter of 2021.

**STAFF RECOMMENDATION:** Staff is requesting the BCAG Board authorize the Executive Director to negotiate and execute an agreement with a selected team to design and construct the electric vehicle underground charging infrastructure.

Key Staff: Jon Clark, Executive Director  
Andy Newsum, Deputy Director

BUTTE COUNTY ASSOCIATION  
OF GOVERNMENTS



BOARD OF DIRECTORS MEETING  
ITEM #8





## BCAG BOARD OF DIRECTORS

## Item #8 Information

October 22, 2020

### **DRAFT 2020 REGIONAL TRANSPORTATION PLAN (RTP) / SUSTAINABLE COMMUNITIES STRATEGY (SCS) & SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT PUBLIC REVIEW PERIOD AND WORKSHOP**

**PREPARED BY:** Ivan Garcia, Transportation Programming Specialist

**ISSUE:** The Butte County Association of Governments (BCAG) is the state designated Regional Transportation Planning Agency (RTPA) and federally designated Metropolitan Transportation Planning (MPO) for the Butte County region. BCAG is required to prepare and update the RTP/SCS by December 2020.

**DISCUSSION:** The Draft 2020 RTP/SCS and Supplemental Environmental Impact Report are complete and available for public review. The complete draft documents are available at the Chico and Oroville Public Libraries and the BCAG offices. All material has been posted online at BCAG's website at: <http://www.bcag.org/Planning/RTP--SCS/index.html>.

The 2020 RTP/SCS contains the following:

1. RTP/SCS Document – including all required elements (Policy, Action, Financial and the SCS)
2. Air Quality Conformity Analysis and Determination – demonstrating that the projects in the RTP/SCS conform to the applicable federal air quality requirements.
3. Environmental Impact Report – complying with the California Environmental Quality Act requirements

The notice of availability has been placed in the local newspapers, posted on social media, and emailed to BCAG's advisory committees and interest distribution list.

#### Public Outreach

Due to COVID 19 concerns and social distancing recommendations, staff has scheduled the next public workshop for the RTP/SCS via Zoom. The Zoom workshop has been scheduled for November 5, 2020 from 4:00 p.m. to 6:00 p.m. An extensive power point presentation has been prepared which summarizes the purpose of the

**BCAG Board of Directors Meeting – Item #8**

**October 22, 2020**

**Page 2**

RTP/SCS and the contents of the draft plan. The power point presentation has been posted online at: <http://www.bcag.org/Planning/RTP--SCS/index.html>. This workshop will be recorded and made available online for future reference. The public will be able to ask questions during the Zoom workshop, and/or email comments

BCAG is required to hold two public hearings to solicit comments. The official comment period started October 8, 2020 and will run through November 22, 2020.

**STAFF RECOMMENDATION:** Staff requests the Board Chair open a public hearing to solicit comments.

Key Staff: Ivan Garcia, Transportation Programming Specialist  
Brian Lasagna, Regional Analyst

BUTTE COUNTY ASSOCIATION  
OF GOVERNMENTS



BOARD OF DIRECTORS MEETING  
ITEM #9



## BCAG BOARD OF DIRECTORS

## Item #9 Information

October 22, 2020

### DRAFT 2020 REGIONAL HOUSING NEEDS PLAN (RHNP)

**PREPARED BY:** Chris Devine, Planning Manager

**ISSUE:** BCAG is required to update its Regional Housing Needs Plan (RHNP) every 8 years. The last update was completed in 2012. BCAG staff has initiated the 2020 update of the RHNP which is scheduled for adoption in December 2020. A draft RHNP document has been completed and is available for review and comment.

**DISCUSSION:** The draft RHNP document has been completed and is provided in **Attachment #1** for the Board's review and information. The draft plan has been posted to the project website and BCAG staff will be coordinating with the Planning Directors Group and key stakeholders to solicit further input.

The draft plan incorporates the final allocation methodology discussed under agenda item #4 and meets all statutory requirements of California Government Code Section 65584. As the Board is aware, BCAG staff has prepared the 2020 RHNP update in coordination with its consultant team at PlaceWorks, its member jurisdictions via the Planning Directors Group meetings, as well as key stakeholders and the state department of Housing and Community Development (HCD). These groups have provided input as the plan update has unfolded, ensuring various viewpoints are reflected in the draft document.

The draft RHNP will now undergo a 45-day period of review by BCAG member jurisdictions. Following the conclusion of the 45-day review period, the BCAG Board will open a public hearing, then vote on adoption of the final plan at the December 10<sup>th</sup> meeting.

#### Background

California Government Code Section 65584 requires BCAG to prepare a RHNP covering all jurisdictions in Butte County. The RHNP indicates how Butte County's regional housing need, as stipulated by the California Department of Housing and Community Development (HCD), is to be allocated on a "fair share" basis among the municipalities and the unincorporated County. Each jurisdiction must then use its regional "fair share" allocation as the basis for updating the Housing Element of its General Plan.

While the preparation of the RHNP is a State requirement, the RHNP is an important component that allows BCAG to fulfill its federal requirements as Butte County's Metropolitan Planning Organization (MPO). The RHNP is a key input into BCAG's regional transportation model, its Regional Transportation Plan (RTP), and its Sustainable Communities Strategy (SCS). Housing is also one of the primary data sets used in building the transportation model's current and future land use scenarios, and in preparing BCAG's federal-required air quality conformity determinations.

**STAFF RECOMMENDATION:** This item is presented for the Board's information.

Key Staff: Chris Devine, Planning Manager  
Brian Lasagna, Regional Analyst

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# BUTTE COUNTY ASSOCIATION OF GOVERNMENTS 6TH CYCLE REGIONAL HOUSING NEEDS PLAN

**PUBLIC REVIEW DRAFT**

October 2020

**Prepared for:**

Butte County Association of Governments  
326 Huss Drive, Suite 150  
Chico, CA 95928

**Prepared by:**

PlaceWorks  
1625 Shattuck Avenue, Suite 300  
Berkeley, CA 94709

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## APPENDICES – *Items listed below are forthcoming and will be provided with the Final RHNP*

1. Excerpts from California Government Code Section 65584
2. Regional Allocation Determination Letter from HCD
3. RHNA Methodology Consistency Determination from HCD
4. Comments received on draft methodology and BCAG responses
5. Butte County Long-Term Regional Growth Forecasts 2018-2040
6. Affirmatively Furthering Fair Housing Survey Results
7. Public Outreach and Notices



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# BUTTE COUNTY ASSOCIATION OF GOVERNMENTS

## 6TH CYCLE REGIONAL HOUSING NEEDS PLAN

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### EXECUTIVE SUMMARY

The Regional Housing Needs Allocation (RHNA) process is mandated by California law and requires all local jurisdictions to plan for their ‘fair share’ of housing units at all affordability levels. This Regional Housing Needs Plan (RHNP) is part of the Butte County Association of Governments’ (BCAG) 6th Cycle RHNA, sometimes referred to as the “2020 update of the BCAG RHNP,” covering the period from December 31, 2021, to June 15, 2030, and assigning housing need allocations to the Cities of Biggs, Chico, Gridley, Oroville, the Town of Paradise, and Butte County.

The RHNA process consists of several key steps. First, the California Department of Housing and Community Development (HCD) allocates a specified number of housing units to the region, segmented into four income affordability levels: very low-income, low-income, moderate-income, and above moderate-income. For this 6th Cycle RHNA, the BCAG region received an allocation of 15,506 units: 6,703 units to accommodate regular growth and an additional 8,803 units to rebuild those lost in the 2018 Camp Fire. The next step is typically facilitated by the region’s council of governments, in this case, BCAG, which develops a methodology to allocate units by income level to each jurisdiction within the region and incorporates the approved methodology into an RHNP. When the RHNP is complete, local jurisdictions must plan to accommodate the development of their respective allocation of units in each income group through the Housing Element of their General Plans, as required by State law.

The California Government Code requires the RHNA methodology to further five specific objectives and incorporate a series of factors. These objectives and factors primarily serve to further fair housing goals and overcome historical income segregation patterns across the state by directing new units in relatively job-rich and high-amenity areas within each region.

This Regional Housing Needs Plan (RHNP) summarizes BCAG’s RHNA process, describing the planning process, methodologies, and outcomes. **Table 1** shows the final RHNA allocation across jurisdictions in Butte County, using the State-approved allocation methodology that incorporates the required objectives and factors.

**TABLE 1 FINAL BUTTE COUNTY JURISDICTIONAL ALLOCATION BY INCOME TIER**

Jurisdiction	Affordability Tier				Total
	Very Low	Low	Moderate	Above Moderate	
City of Biggs	36	1	12	32	81
City of Chico	1,101	507	770	1,110	3,488
City of Gridley	118	41	30	156	345
City of Oroville	171	6	73	375	625
Town of Paradise	383	374	1,319	5,103	7,179
Unincorporated	272	361	998	2,157	3,788
<b>County Total</b>	<b>2,081</b>	<b>1,290</b>	<b>3,202</b>	<b>8,933</b>	<b>15,506</b>

## 1. INTRODUCTION

### 1.1 OVERVIEW OF CALIFORNIA STATE LAW, REGULATORY REQUIREMENTS, AND THE RHNA PROCESS

State law requires that all regional governing bodies, counties, and cities work with the California Department of Housing and Community Development (HCD) to participate in the Regional Housing Needs Allocation (RHNA) process. A central goal of the RHNA process is to meet the housing needs of people at all income levels through effective planning at the State, regional, and local levels. Councils of governments, like the Butte County Association of Governments (BCAG), play a fundamental role in the process.

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

#### 1. *HCD Provides a Regional Determination*

HCD calculates the regional housing needs assessment, segmented into four income affordability tiers, to accommodate regular growth in the region. The determination is largely based on regional projections of new household growth from the California Department of Finance (DOF) and consultation with the local council of governments, in this case, BCAG. In addition to the regular growth allocation, for the 6th RHNA Cycle, HCD provided a fire rebuild allocation to the BCAG region in recognition of the units lost in the 2018 Camp Fire. These units are also segmented by income tier, based on the affordability levels of the actual units destroyed.

#### 2. *Regional Government Develops Allocation Methodology*

Once HCD provides its determination of regional housing needs, the council of governments works in coordination with its member jurisdictions to develop a methodology for allocating the housing needs amongst the region's jurisdictions by income level.

#### 3. *Local Jurisdictions Adopt Housing Element Policies based on RHNA Allocations*

Once local jurisdictions receive their allocation of units, they must update the Housing Element of their General Plans to accommodate their respective allocations over the eight-year RHNA cycle. When each Housing Element is complete, it is submitted to HCD for certification and confirmation that it meets all legal requirements and will accommodate the assigned RHNA.

### 1.2 RHNA FACTORS AND OBJECTIVES

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

## **Objectives**

California Government Code identifies five objectives that adopted allocation methodologies must “further.” These objectives are copied from Section 65584(d) of the Government Code:

1. *Increasing the housing supply and the mix of housing types, tenure, and affordability in all cities and counties within the region in an equitable manner, which shall result in each jurisdiction receiving an allocation of units for low- and very low-income households.*
2. *Promoting infill development and socioeconomic equity, the protection of environmental and agricultural resources, the encouragement of efficient development patterns, and the achievement of the region’s greenhouse gas reductions targets provided by the California Air Resources Board pursuant to Section 65080.*
3. *Promoting an improved intraregional relationship between jobs and housing, including an improved balance between the number of low-wage jobs and the number of housing units affordable to low-wage workers in each jurisdiction.*
4. *Allocating a lower proportion of housing need to an income category when a jurisdiction already has a disproportionately high share of households in that income category, as compared to the countywide distribution of households in that category from the most recent American Community Survey.*
5. *Affirmatively furthering fair housing, which for the purposes of this process means ‘taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics. Specifically, affirmatively furthering fair housing means taking meaningful actions that, taken together, address significant disparities in housing needs and in access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws.’*

Section 4, *Methodology*, of this report details how these objectives are furthered by BCAG’s adopted methodology for the 6th Cycle RHNA.

## **Factors**

While the Government Code’s objectives are goals for the methodology to achieve, factors are specific considerations that must be evaluated when developing the allocation methodology and incorporated in the adopted methodology, where appropriate. There are 15 factors the methodology must consider, outlined in Government Code Section 65584.04(e) and summarized herein. The full text appearing in the Government Code is provided in Appendix 1:

1. Lack of capacity for sewer or water service due to decisions outside jurisdiction’s control
2. Availability of land suitable for urban development
3. Lands protected from urban development under existing federal or state programs
4. County policies to preserve prime agricultural land

5. Distribution of household growth in the Regional Transportation Plan (RTP) and opportunities to maximize use of transit and existing transportation infrastructure
6. Jurisdictional agreements to direct growth toward incorporated areas
7. Loss of deed-restricted affordable units
8. Housing needs of farmworkers
9. Housing needs generated by a university within the jurisdiction
10. Existing and projected jobs and housing relationship, particularly low-wage jobs and affordable housing
11. Households paying more than 30 percent and more than 50 percent of their income in rent
12. The rate of overcrowding
13. Housing needs of individuals and families experiencing homelessness
14. Units lost during a state of emergency that have yet to be replaced
15. The region's greenhouse gas targets

Items 11 through 15, and the clause in item 10 calling for special consideration of the balance between low-wage jobs and affordable housing, are new requirements for the 6th Cycle RHNA. All other required factors have been carried forward from the 5th Cycle RHNA.

### **LOCAL JURISDICTION SURVEY ON FACTORS**

Government Code Section 65584.04(b) stipulates that BCAG must survey all member jurisdictions for information regarding the required factors, specifically to "...review and compile information that will allow the development of a methodology based upon the issues, strategies, and actions that are included, as available, in an Analysis of Impediments to Fair Housing Choice or an Assessment of Fair Housing..." prepared for any jurisdictions in the region. BCAG and its RHNP consultant, PlaceWorks, conducted a survey of all six member jurisdictions from June 2 to June 10, 2020. The results of the survey are included in Appendix 6.

### **1.3 ORGANIZATION OF THIS REPORT**

The following sections of this report describe the 6th Cycle RHNA process specific to Butte County:

- Section 1 provides an overview of State law, RHNA factors and objectives, and the organization of this report.
- Section 2 details the process by which HCD calculated the 6th Cycle regional housing needs determination for Butte County.
- Section 3 details BCAG's oversight of the methodology development and public engagement.
- Section 4 details the adopted methodology with which BCAG is allocating the assigned units, segmented by income tier, among each member jurisdiction, including the Cities of Biggs, Chico, Gridley, and Oroville; the Town of Paradise; and Butte County.

## 2. REGIONAL HOUSING NEEDS DETERMINATION

The final BCAG regional housing needs determination for the 6th Cycle RHNA is 15,506 units, which includes 6,703 units for regular growth and 8,803 units as a fire rebuild allocation. As is typical, the determination includes an allocation of units by affordability tier. BCAG’s basic allocation is based on growth anticipated over the eight-year RHNA Cycle and is referred to herein as the ‘regular growth’ allocation. The fire rebuild allocation is unique to the region during the 6th Cycle RHNA process, and stems from the November 2018 Camp Fire, which destroyed over 14,500 homes in the Town of Paradise and unincorporated Butte County. The region’s allocation of units by income tier for both regular growth and fire rebuild is detailed in **Table 2**.

**TABLE 2 BCAG REGIONAL INCOME TIER ALLOCATION**

Income Level	Regular Growth		Fire Rebuild		All Units Combined	
	Unit Percent	Unit Total	Unit Percent	Unit Total	Unit Percent	Unit Total
Very low	26.4%	1,771	3.5%	310	13.4%	2,081
Low	14.6%	980	3.5%	310	8.3%	1,290
Moderate	15.8%	1,060	24.3%	2,142	20.7%	3,202
Above Moderate	43.1%	2,892	68.6%	6,041	57.6%	8,933
<b>Total</b>	<b>100%</b>	<b>6,703</b>	<b>100%</b>	<b>8,803</b>	<b>100%</b>	<b>15,506</b>

**Note:** Due to rounding, percentages may not total precisely.

BCAG’s RHNA process began with an extensive, six-month consultation between HCD and BCAG staff, from December 2019 through May 2020, covering the methodology, data sources, and timeline for HCD’s determination of the regional housing need. The full text of HCD’s final determination to BCAG is provided in Appendix 2.

The 6,703-unit regular growth allocation was calculated by HCD using American Community Survey (ACS) estimates of the current Butte County population in residential housing (not living in group quarters, such as dorms) and projections of population and household growth developed by the DOF for the eight-year RHNA period (2022 through 2030), adjusted based on the following ACS indicators of current unmet housing need: vacancy rates, overcrowding rates, replacement need for decommissioned housing, and cost burden rates of households paying greater than 30 and 50 percent of household income toward housing.

HCD then segmented the assessed regional need into four income affordability tiers based on ACS data on household income and the area median income (AMI) of the region, which is currently \$48,433. The income affordability tiers are calculated, using the following percentages of Butte County’s AMI:

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

The fire rebuild allocation included in the regional determination represents the number of units lost in the Camp Fire that might be rebuilt during the eight-year RHNA cycle, based on HCD's consultation process with BCAG. The affordability tiers assigned to the fire rebuild units are based on the actual income-affordability levels of the units that were lost in the Camp Fire. **Table 2** summarizes Butte County's total regional allocation of units in each affordability tier for both the fire rebuild units and the regular growth units.

In 2020, just as this RHNP was being completed, the region experienced another deadly and destructive wildfire season, which included the Bear Fire that destroyed more than 1,500 homes. Because these units are not accounted for in the current RHNA determination, they are also not considered in the allocation methodology described in Section 4 of this RHNP.

### **3. 6TH CYCLE RHNA OVERSIGHT AND OUTREACH**

The 6th Cycle RHNA methodology for the BCAG region was informed by input from stakeholders and developed in close coordination with the BCAG Planning Directors Group (PDG), with guidance and oversight from the BCAG Board of Directors and consultation with HCD.

#### **3.1 STAKEHOLDER OUTREACH**

BCAG staff, in consultation with member jurisdictions, identified stakeholders to engage in the 6th Cycle RHNA. On May 19, 2020, BCAG held an RHNP Stakeholder Workshop to review the process and goals of the RHNA and engage in a thoughtful discussion of the factors to be incorporated in the RHNA methodology. At the direction of the PDG, BCAG consultants held additional conversations with representatives from the California State University Chico North State Planning and Development Collective to closely review the factors for affirmatively furthering fair housing, discussed in section 4.1 of this document.

#### **3.2 PLANNING DIRECTORS GROUP**

The BCAG PDG, composed of senior planning staff from all six member jurisdictions, served as the technical advisory group for the 6th Cycle RHNA. The PDG held five meetings to review data and draft materials and provide critical input on the RHNA methodology, offering valuable insights and feedback to inform the RHNA through direct communications with BCAG staff and consultants throughout its development. In June 2020, PDG members also participated in the member survey included in Appendix 6. PDG's guidance was particularly instrumental in addressing data gaps resulting from the drastic impact of the Camp Fire to the region, which is not reflected in data sources typically used in the RHNA process.

#### **3.3 BCAG BOARD OF DIRECTORS**

The BCAG Board of Directors is composed of one elected representative from each of the four member cities and the Town of Paradise, as well as all the County's five Supervisors. As the governing body of BCAG, the Board is responsible for all policy decisions and served to approve the draft and final RHNA methodology. The Board of Directors was engaged throughout the methodology development, representing the interests of constituents and working collaboratively to achieve an equitable and mutually agreeable methodology that fulfills all legal requirements.

#### **3.4 HCD REVIEW**

Pursuant to California Government Code Section 65584.04(i), HCD is required to review draft RHNA methodologies to determine whether the methodology furthers the statutory objectives described in Government Code Section 65584(d). On August 10, 2020, BCAG submitted the draft methodology for 60-day review by HCD. On October 9, 2020, HCD responded, finding that the draft BCAG RHNA Methodology furthers

the five statutory objectives of RHNA conditional upon one revision: to include an allocation of at least one low-income unit for the City of Biggs. This revision meets the California Government Code Section 65584(d)(1) requirement that each jurisdiction receive an allocation of at least one unit for low- and very low-income households.

HCD's review also includes a detailed analysis of how the draft methodology furthers each of the statutory objectives. Regarding objective 2, HCD noted an openness to increasing the weighting of the methodology factors (described in Section 4.1). The complete review from HCD is provided as Appendix 3.

In response to HCD's findings, the draft methodology was revised to reallocate one low-income unit from the City of Chico to the City of Biggs, and to reallocate one very low-income unit from the City of Biggs to the City of Chico, which ensures that each jurisdiction's total allocation is not impacted by the revision and that the region continues to meet its affordability requirements for each income tier.

Following consideration of HCD's openness to and adjusted factor weighting, BCAG elected to maintain the factor weighting included in the draft methodology. During the process of developing the draft methodology, PDG members considered multiple factor-weighting alternatives. After careful consideration, members of the PDG supported a weighting of 10 percent for each of the five factors and a weighting of 50 percent for the base allocation (the baseline and factor weighting are discussed in detail in Section 4).

## 4. METHODOLOGY

This section provides a description of the adopted methodology to allocate housing units by income level among the BCAG member jurisdictions, the process for developing the methodology, and how the methodology addresses the statutory requirements for furthering the five RHNA objectives identified in Government Code Section 65584(d). The methodology consists of two primary components: the spatial allocation of units to each jurisdiction and the distribution of units by income tier. Following is an overview of the methodology for each component.

### 4.1 UNIT ALLOCATION METHODOLOGY

The unit allocation methodology applies five weighted factors to distribute the regular growth allocation across BCAG's six-member jurisdictions. The fire rebuild allocation is separately assigned to the jurisdictions that lost units in the Camp Fire (the Town of Paradise and unincorporated Butte County) based on the total rebuild units assigned and each jurisdiction's proportionate loss of units in the fire.

#### REGULAR GROWTH ALLOCATION

To distribute the regular growth allocation among the jurisdictions, the methodology starts with assigning a base allocation, which is the product of the jurisdictions' forecasted share of regular growth in the 2018–2040 BCAG Growth Forecast, provided in Appendix 5, and the regular growth allocation. The base allocation establishes a foundational allocation that recognizes the significant capacity differences between jurisdictions and provides for an allocation that is suitable for each jurisdiction's existing size. For example, the most populous city in the region, Chico, has approximately 57 times more housing units than the least populous city, Biggs. The 2018–2040 BCAG Growth Forecast reflects these differences and attributes 45 percent of anticipated regional housing growth to Chico and only 1.3 percent to Biggs. These projections represent a local housing unit increase of 31.2 percent in Biggs and only 18.7 percent in Chico, so Biggs (as an example) is still receiving a larger percentage of the base allocation than Chico relative to its current housing total. The base allocation is shown in **Table 3**.



**TABLE 3 BASE ALLOCATION**

Jurisdiction	Jurisdictional Percent of Regional Growth in 2018–2040 Growth Forecast	Base Allocation
Biggs	1.3%	87
Chico	45.0%	3,016
Gridley	5.4%	362
Oroville	9.7%	650
Paradise	5.6%	376
County Unincorporated	33.0%	2,212
<b>Total</b>	<b>100%</b>	<b>6,703</b>

**Allocation Factors**

Using the base allocation as a foundation, the draft methodology adjusts each jurisdiction’s regular growth allocation using five weighted factors.

In preparation for choosing the allocation factors, BCAG collected and analyzed more than 20 data layers, including:

- Jobs and jobs-housing balance
- Opportunities and constraints to development in each jurisdiction
- Preserved and protected land
- Designated agricultural land
- The distribution of household growth in the RTP (the base allocation)
- Cost-burdened households
- Overcrowding
- Homelessness
- Loss of housing units from the Camp Fire
- Wildfire risk
- Flood and erosion hazards
- Protected and/or sensitive environmental lands
- Vehicle miles traveled
- Transit connectivity
- Affordable housing stock
- HCD/Tax Credit Allocation Committee (TCAC) Opportunity Maps
- Childhood poverty status

After thoughtful consideration of all factors, the BCAG Board, with support from the PDG, agreed to use Transit Connectivity, Jobs, Wildfire Risk, Agriculture and Forest Land Preserves, and a combined HCD/TCAC Opportunity Maps and Childhood Poverty Status measure of opportunity as the factors to adjust the base allocation. Each of these measures is shown in **Table 4** and described in more detail herein.

**TABLE 4 PROPOSED FACTORS AND SCALED SCORES**

Jurisdiction	Transit Connectivity	Jobs	Wildfire Risk	Agriculture and Forest Land Preserves	Opportunity		
					HCD/TCAC Opportunity Map	Percent of Children Living Above the Poverty Level	Combined HCD/TCAC and Childhood Poverty
Biggs	0.57	0.50	1.50	1.43	0.86	0.83	0.78
Chico	1.50	1.50	1.48	1.24	1.50	1.21	1.50
Gridley	0.65	0.54	1.50	1.34	0.87	1.16	1.02
Oroville	1.07	0.76	1.46	1.32	0.79	0.50	0.50
Paradise	0.78	0.58	0.50	1.50	0.57	1.50	1.05
Unincorporated County	0.50	0.74	1.06	0.50	0.50	1.27	0.84

**Transit Connectivity**

Availability of transit service is a key consideration in siting housing because transit allows residents to access jobs and services without generating vehicle trips. The Transit Connectivity factor is based on the Transit Connectivity Score prepared by AllTransit for each incorporated jurisdiction and the County as a whole. The Transit Connectivity Score is a measure of how connected the average household member is to the availability of a transit ride and accessibility to jobs using transit. More information on the Transit Connectivity score and how it is developed is available in the [AllTransit Methods](#) document. BCAG consultants used the incorporated jurisdictions’ and County-wide scores to derive a transit connectivity score for the unincorporated County.

**Jobs**

The availability of jobs in a community is an important consideration in siting housing, since residents need access to jobs for economic reasons, and the proximity of jobs to residents minimizes travel time and vehicle miles traveled (VMT). Current regional job count data is sourced from the California Employment Development Department (EDD). The distribution of jobs per jurisdiction was determined using each jurisdiction’s proportion of regional jobs from the latest available (2017) Longitudinal Employer-Household Dynamics (LEHD) OnTheMap estimates. Because this distribution predated the 2018 Camp Fire, the jurisdictional jobs distribution was then adjusted to account for the fire impact and calculate the resulting Jobs Factor.

**Wildfire Risk**

The 2018 Camp Fire was the deadliest wildfire in the state’s history and destroyed more than 14,000 homes in Butte County. The Wildfire Risk Factor uses 2020 CalFire measures of high- and very high-wildfire risk and geographic information system (GIS) analysis to determine what percentage of each jurisdiction’s land is not at a high- or very-high risk of wildfire. The intent of this factor is to prioritize the construction of homes in jurisdictions with a lower risk of wildfire.

### ***Agriculture and Forest Land Preserves***

Agriculture is Butte County's number one industry; in 2018, it produced more than \$680 million worth of farming products. The region has a deep commitment to protecting its agriculture lands. In addition, the region has two national forests preserved from development. The methodology used GIS analysis to determine the percentage of land in each jurisdiction not designated for agriculture or preserved as part of a national forest. The resulting percentage of land available for development makes up the Agriculture and Forest Land Preserves Factor.

### ***Opportunity***

BCAG and member jurisdictions considered both HCD/TCAC Opportunity Maps and Percent of Children Living Above the Poverty Level as potential factors to support the equitable distribution of housing units.

- The HCD/TCAC Opportunity Maps calculate opportunity scores at the census block group level using 21 indicators: Income, Adult Educational Attainment, Labor Force Participation, Job Proximity, Median Home Value, 12 environmental health/pollution indicators, 4th Grade Math Proficiency, 4th Grade Reading Proficiency, High School Graduation Rate, and Students Living Above the Federal Poverty Level.
- The Percent of Children Living Above Poverty Level measure uses 2013–2018 ACS data prepared by the U.S. Census Bureau. This measure was considered because it has been recognized as a strong indicator for evaluating the level of economic stability and opportunity for families with children in a population. In addition, childhood poverty status has implications for positive life outcomes, as recognized by the similar Students Living Above Poverty Level indicator in the HCD/TCAC Opportunity measure.

BCAG determined that a combination of these two indicators would be the best measure of economic opportunity, because neither of them seemed to represent conditions in Butte County on its own. For example, the Town of Paradise, which scored second lowest in the County using the TCAC/HCD measure, is generally recognized as offering greater opportunity than many other jurisdictions in the county; this fact is illustrated by the Percent of Children Living Above Poverty indicator.

### ***Factor Normalization***

Each of these five selected factors is normalized on a scale of 0.5 to 1.5. The normalized scale serves to support ease of computation and comparison of factors among each other, and the range of the scale (0.5 to 1.5) is large enough to impact the distribution of housing units by adjusting them up (any score between 1 and 1.5) or down (any score between 0.5 and 1) from the base allocation, but not so large that the base allocation becomes insignificant. All factors are configured so that higher scores indicate that the jurisdiction is more favorable to support housing as far as that factor is concerned, while lower scores indicate less-favorable conditions for housing. For example, jurisdictions with better transit connectivity receive higher scores for the Transit Connectivity factor and jurisdictions with high-fire risk receive a lower score for the Wildfire Risk factor resulting in more housing units assigned to jurisdictions with better transit connectivity and lower risk of wildfire.

For the Opportunity factor, which consists of two inputs, BCAG and its member jurisdictions agreed to add the normalized (0.5 to 1.5) scores of the two measures and re-normalize the sum to create a new, combined measure of opportunity. The combination addresses concentrations of poverty and maximizes access to opportunity, as measured by HCD/TCAC.

**Factor Weighting**

Following selection of the factors, the draft methodology assigns weights to each. These weights establish what percentage of the total allocation will be distributed based on that factor. Each of the factors advance important priorities in the BCAG region and were therefore assigned an equal weight of 10 percent each so that 50 percent of the allocation is determined by the five factors. The remaining 50 percent of units are allocated in accordance with the Regional Growth Forecast and the base allocation. This supports consistency with the Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS), as well as member jurisdiction General Plans and favors a more balanced distribution of growth, rather than concentrating a vast majority in the City of Chico. All weights are summarized below.

- Combined TCAC/HCD Opportunity and Childhood Poverty Status Factor: 10-percent weight
- Transit Connectivity: 10-percent weight
- Number of Jobs: 10-percent weight
- Wildfire Risk: 10-percent weight
- Agriculture and Forest Land Preserves: 10-percent weight
- Base Allocation: 50-percent weight

Table 5 shows the resulting factor-adjusted allocations for each jurisdiction.

**TABLE 5 BASE ALLOCATION AND FACTOR ADJUSTMENT**

Jurisdiction	Base Allocation	Factor-Adjusted Allocation	Net Change
Biggs	87	81	(6)
Chico	3,016	3,488	472
Gridley	362	345	(17)
Oroville	650	625	(25)
Paradise	376	342	(34)
Unincorporated	2,212	1,822	(390)
<b>Total</b>	<b>6,703</b>	<b>6,703</b>	<b>—</b>

**FIRE REBUILD ALLOCATION**

Once the regular growth allocation has been distributed to each jurisdiction, the fire rebuild allocation is added to reach the total allocation for all jurisdictions. As described previously, this step simply distributes the units explicitly assigned by HCD as fire rebuild units to the two jurisdictions that lost housing units in the Camp Fire, based on each jurisdiction’s proportion of total housing units lost. Table 6 shows the combination of the factor-adjusted regular growth allocation with the fire rebuild allocation to create the cumulative total allocation.

**TABLE 6 FIRE REBUILD AND FINAL ALLOCATION**

Jurisdiction	Factor-Adjusted Allocation	Fire Allocation	Total Allocation
Biggs	81	—	81
Chico	3,488	—	3,488
Gridley	345	—	345
Oroville	625	—	625
Paradise	342	6,837	7,179
Unincorporated	1,822	1,966	3,788
<b>Total</b>	<b>6,703</b>	<b>8,803</b>	<b>15,506</b>

## 4.2 INCOME ALLOCATION METHODOLOGY

The regional housing allocation provided by HCD includes both a total number of housing units and a distribution of those units across four affordability tiers: very low-income, low-income, moderate-income, and above-moderate income. Once the overall allocation for each jurisdiction is set, each jurisdiction’s housing unit allocation must be distributed among the four income tiers and the sum allocation in each income tier across all jurisdictions must equal the total amount set by HCD for the entire region. The BCAG regional income tier allocation from HCD is separated into two categories: regular growth and fire rebuild units, which are shown in Table 7.

**TABLE 7 BCAG REGIONAL INCOME TIER ALLOCATION**

Income Level	Regular Growth		Fire Rebuild		All Units Combined	
	Unit Percent	Unit Total	Unit Percent	Unit Total	Unit Percent	Unit Total
Very low	26.4%	1,771	3.5%	310	13.4%	2,081
Low	14.6%	980	3.5%	310	8.3%	1,290
Moderate	15.8%	1,060	24.3%	2,142	20.7%	3,202
Above Moderate	43.1%	2,892	68.6%	6,041	57.6%	8,933
<b>Total</b>	<b>100%</b>	<b>6,703</b>	<b>100.00%</b>	<b>8,803</b>	<b>100%</b>	<b>15,506</b>

**Note:** Due to rounding, percentages may not total precisely.

### REGULAR GROWTH INCOME DISTRIBUTION

The approved methodology uses the following process to distribute the regular growth units by income tier to each jurisdiction. Each numbered step is accompanied by a bulleted description of the justification and relevant background to that step, where appropriate.

1. Determine the current distribution of household income tiers for each jurisdiction.
  - » This step uses data from the 2013–2018 ACS. Though this data predates the 2018 Camp Fire, it was agreed upon by PDG members as the best-available measure of household incomes.

2. Calculate the number of units to allocate to each municipality by income tier, such that they make proportional progress toward an equal distribution of income tiers over the long-term.
  - » The region aims to achieve an equal housing unit income distribution across all jurisdictions; however, the level of change needed is too extreme to reasonably achieve over the eight-year RHNA cycle. Instead, the methodology calculates the increase in units for each income tier needed to have each community match HCD's assigned income tier allocation by the horizon year 2040 and then adjust each municipality's income distribution on a straight-line basis for the eight-year period of the RHNA.
  - » BCAG's member agencies agree that the unincorporated County should not increase its share of low- and very low-income units, and that those units should instead be concentrated in better resourced, incorporated jurisdictions.
  - » Based on the ACS data gathered in step 1, the City of Biggs has already met its share of low-income units needed to achieve an equal distribution by 2040. This would suggest that Biggs should receive a low-income allocation of zero. However, Government Code stipulates that all jurisdictions must receive an allocation of one or more units in both the low- and very low-income tiers, so Biggs is assigned one unit in the low-income tier.
3. Review each jurisdictions' combined allocation of low- and very low-income units to ensure that the combined percentage is less than or equal to the percentage assigned to it in the 5th Cycle. This requires reallocation for Biggs, Chico, Gridley, and Paradise.
  - » This step is in accordance with a practice followed in BCAG's 5th Cycle RHNA. The combined percentage of low- and very low-income units in the 5th Cycle RHNA were between 37.8 and 45.4 percent of units for all jurisdictions.
4. As a final step, the methodology makes adjustments to ensure that each jurisdiction's sum allocation across income tiers equals the jurisdiction's total regional allocation and that the county-wide allocation in each income tier is equal to the amount set by HCD. Note that this process also results in revised combined allocations of low- and very low-income units to Biggs, Chico, Gridley, and Paradise, whose percentages are greater than the percentages assigned in the 5th Cycle.

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The final distribution of units across all income tiers is shown in **Table 8**.

**TABLE 8 INCOME DISTRIBUTIONS BY JURISDICTION**

Jurisdiction	Very Low		Low		Moderate		Above Moderate		Total Housing Units
	%	Housing Units	%	Housing Units	%	Housing Units	%	Housing Units	
City of Biggs	44.4%	36	1.2%	1	14.8%	12	39.5%	32	81
City of Chico	31.6%	1,101	14.5%	507	22.1%	770	31.8%	1,110	3,488
City of Gridley	34.2 %	118	11.9%	41	8.7%	30	45.2%	156	345
City of Oroville	27.4%	171	1.0%	6	11.7%	73	60.0%	375	625
Town of Paradise	21.3%	73	18.7%	64	9.4%	32	50.6%	173	342
Unincorporated	14.9%	272	19.8%	361	7.8%	143	57.4%	1,046	1,822
<b>County Total</b>	<b>26.4%</b>	<b>1,771</b>	<b>14.6%</b>	<b>980</b>	<b>15.8%</b>	<b>1,060</b>	<b>43.1%</b>	<b>2,892</b>	<b>6,703</b>
<b>HCD Requirement</b>	<b>26.4%</b>	<b>1,771</b>	<b>14.6%</b>	<b>980</b>	<b>15.8%</b>	<b>1,060</b>	<b>43.1%</b>	<b>2,892</b>	<b>6,703</b>

**FIRE REBUILD ALLOCATION INCOME DISTRIBUTION**

To distribute the fire rebuild units by income tier between the Town of Paradise and the County, the methodology assigns a rebuild share proportionate with the actual loss of units in each jurisdiction by income tier. This distribution is shown in **Table 9**.

**TABLE 9 FIRE REBUILD ALLOCATION INCOME DISTRIBUTION**

Jurisdiction	Very Low		Low		Moderate		Above Moderate		Total Housing Units
	%	Housing Units	%	Housing Units	%	Housing Units	%	Housing Units	
Town of Paradise	3.5%	310	3.5%	310	14.6%	1,287	56.0%	4,930	6,838
Unincorporated	0.0%	—	0.0%	0	9.7%	855	12.6%	1,111	1,965
<b>County Total</b>	<b>3.5%</b>	<b>310</b>	<b>3.5%</b>	<b>310</b>	<b>24.3%</b>	<b>2,142</b>	<b>68.6%</b>	<b>6,041</b>	<b>8,803</b>

**TOTAL ALLOCATION BY INCOME TIER**

As a final step, the jurisdictional allocation by income tier for regular growth and fire rebuild are combined, yielding the total allocation for each jurisdiction in each income tier, shown in **Table 10**. The final row in **Table 10** shows the overall HCD requirement for comparison.

**TABLE 10 TOTAL ALLOCATION BY INCOME TIER**

Jurisdiction	Very Low		Low		Moderate		Above Moderate		Total
	%	Housing Units	%	Housing Units	%	Housing Units	%	Housing Units	Housing Units
City of Biggs	44.4%	36	1.2%	1	14.8%	12	39.5%	32	81
City of Chico	31.6%	1,101	14.5%	507	22.1%	770	31.8%	1,110	3,488
City of Gridley	34.2%	118	11.9%	41	8.7%	30	45.2%	156	344
City of Oroville	27.4%	171	1.0%	6	11.7%	73	60.0%	375	625
Town of Paradise	5.3%	383	5.2%	374	18.4%	1,319	71.1%	5,103	7,179
Unincorporated	7.2%	272	9.5%	361	26.3%	998	56.9%	2,157	3,788
<b>County Total</b>	<b>13.4%</b>	<b>2,081</b>	<b>8.3%</b>	<b>1,290</b>	<b>20.7%</b>	<b>3,202</b>	<b>57.6%</b>	<b>8,933</b>	<b>15,506</b>
<b>Overall HCD Requirement</b>	<b>13.4%</b>	<b>2,081</b>	<b>8.3%</b>	<b>1,290</b>	<b>20.7%</b>	<b>3,202</b>	<b>57.6%</b>	<b>8,933</b>	<b>15,506</b>

### 4.3 STATUTORY OBJECTIVES

In compliance with California law, the final methodology furthers all statutory objectives, as outlined herein.

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

As described above, the methodology for allocating units in each income tier supports a redistribution of units, such that the jurisdictions that currently have a lesser share of low- and very low-income units receive a larger allocation. The methodology allocates units in all four income tiers to each of the region’s six jurisdictions.

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

The methodology places the preponderance of units in incorporated, urbanized municipalities to support infill and socioeconomic equity. Moreover, two of the factors used in the methodology prioritize transit connectivity and proximity to jobs to encourage efficient development patterns and support efforts to minimize VMT and greenhouse gas (GHG) emissions. The methodology’s incorporation of the Growth Forecast used in the RTP further supports consistency of the methodology with planning efforts to achieve regional GHG emission-reduction targets. Additionally, the Agriculture and Forest Land Preserves factor prioritizes locating housing in areas not preserved or dedicated to agricultural uses or open space.



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

A typical target relationship between jobs and housing is between 1.3 and 1.6 jobs for every one housing unit. No jurisdiction in the BCAG region has achieved this balance. Two jurisdictions (Paradise and Oroville) have an excess of jobs, although these estimates do not account for the Camp Fire so the number of jobs in Paradise has likely decreased. All other jurisdictions have an oversupply of housing units compared to jobs, as depicted in **Table 11**.

**TABLE 11 JOBS TO HOUSING BALANCE**

Jurisdiction	Total Jobs	Total Housing Units	Jobs-Housing Balance
Biggs	237	696	0.34
Chico	49,238	41,738	1.18
Gridley	2,252	2,540	0.89
Oroville	12,879	7,391	1.74
Paradise	4,226	1,766	2.39
County Unincorporated	11,869	31,991	0.37

The jobs-housing fit, or relationship of low-wage jobs to very low- and low-income households, shows similar but slightly different results. Looking only at existing low- and very low-income households and low-wage jobs located in the jurisdictions, Oroville (2.24 low-wage jobs to low-income households), Chico (2.13 low-wage jobs to low-income households), and Gridley (1.69 low-wage jobs to low-income households) show a need for more low- and very low-income housing in this respect.

The allocation methodology addresses these issues as follows:

1. The fire rebuild allocation addresses the pre-Camp Fire imbalance of jobs to housing units in Paradise by assigning a large number of units to that jurisdiction.
2. Oroville’s higher number of jobs and better transit access, reflected in the Jobs and Transit Connectivity Factors, support the allocation of more housing units to Oroville. However, Oroville’s low Opportunity Score suggests that fewer units should be assigned to it. Further, Oroville’s existing low- and very low-income households as a percentage of total households in the city exceeds the regional average, so, in accordance with Objective 4, the city’s percentage allocation of low- and very low-income households is less than the percentage allocation to other jurisdictions.
3. Gridley is just slightly outside of the preferred jobs-housing fit and is allocated a sufficient share of low- and very low-income housing units to encourage a shift to within the desired range.
4. Chico’s significant allocation of housing units supports a better jobs-housing balance overall. Further, the City’s proportionately large allocation of the region’s low- and very low-income housing units supports an improved jobs-housing fit in Chico.

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

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

**Objective 5.** *Affirmatively furthering fair housing.*

BCAG addresses the objective of affirmatively furthering fair housing by including the HCD/TCAC Opportunity Analysis and Children Living in Poverty as factors in the methodology.

The methodology results in a concentration of housing units in the City of Chico, which offers by far the greatest opportunity in the county, as defined by the HCD/TCAC Opportunity Maps. Chico is one of only two jurisdictions in the county to achieve a positive score (13.14) when the TCAC/HCD Opportunity Map census block group data is aggregated on a jurisdictional scale. The only other jurisdiction to receive a positive score, the City of Gridley, scored only 0.22, and all other jurisdictions scored below zero. Thus, the placement of a preponderance of units in the City of Chico is a strong step toward affirmatively furthering fair housing in the BCAG region.

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# Appendices

1. Excerpts from California Government Code Section 65584
2. Regional Allocation Determination Letter from HCD
3. RHNA Methodology Consistency Determination from HCD
4. Comments received on draft methodology and BCAG responses
5. Butte County Long-Term Regional Growth Forecasts 2018-2040
6. Affirmatively Furthering Fair Housing Survey Results
7. Public Outreach and Notices

# APPENDIX 1

Excerpts from California Government Code Section 65584

# APPENDIX 2

Regional Allocation Determination Letter from HCD

# APPENDIX 3

RHNA Methodology Consistency Determination from HCD

# APPENDIX 4

Comments received on Draft Methodology and BCAG responses



# APPENDIX 5

Butte County Long-Term Regional Growth Forecasts  
2018-2040

# APPENDIX 6

Affirmatively Furthering Fair Housing Survey Results

# APPENDIX 7

## Public Outreach and Notices

### Included:

#### Public Notices

- Press Release – BCAG RHNP 2020 Update Underway
- Press Release – Proposed Methodology
- Press Release – Final RHNP

#### Stakeholder Workshop Materials

- May 19, 2020 Stakeholder Workshop Presentation Slides

#### Planning Directors Relevant Meeting Materials

- April 23, 2020 – Meeting Agenda and Presentation Slides
- May 28, 2020 – Meeting Agenda, Memos, and Presentation Slides
- June 25, 2020 – Meeting Presentation Slides
- July 23, 2020 – Draft Methodology
- October 13, 2020 – TBD

#### BCAG Board of Directors Relevant Meeting Materials

- May 28, 2020 – Meeting Agenda Excerpt and Presentation Slides
- June 25, 2020 – Meeting Agenda Excerpt
- August 27, 2020 – Meeting Agenda Excerpt and Presentation Slides
- October 22, 2020 – TBD