



# 6TH CYCLE

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# REGIONAL HOUSING NEEDS PLAN



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

### 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

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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

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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 North Complex 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 and the Local Agency Formation Commission (LAFCO), 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.

<i><b>BCAG Planning Directors Group Members</b></i>	
Dan Breedon, Butte County	Tom Lando, City of Oroville
Paula Daneluk, Butte County	Wes Ervin, City of Oroville
Pete Calarco, Butte County	Susan Hartman, Town of Paradise
Bob Summerville, City of Biggs	Shannon Costa, Butte LAFCO
Brendan Vieg, City of Chico	Steve Lucas, Butte LAFCO
Bruce Ambo, City of Chico	Brian Lasagna, BCAG
Donna Decker, City of Gridley	Chris Devine, BCAG
Amy Bergstrand, City of Oroville	Jon Clark, BCAG
Dawn Nevers, City of Oroville	Sara Cain, BCAG
Leo DePaola, City of Oroville	

### 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.

***BCAG Board of Directors Members***

- Bill Connelly, District 1 Supervisor, Butte County
- Debra Lucero, District 1 Supervisor, Butte County
- Tami Ritter, District 3 Supervisor, Butte County
- Steve Lambert, District 4 Supervisor, Butte County
- Doug Teeter, District 5 Supervisor, Butte County
- Angela Thompson, Councilmember, City of Biggs
- Randall Stone, Mayor, City of Chico
- Quintin Crye, Councilmember, City of Gridley
- Chuck Reynolds, Mayor, City of Oroville
- Jody Jones, Councilmember, Town of Paradise

### 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 4, 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**

<b>Jurisdiction</b>	<b>Jurisdictional Percent of Regional Growth in 2018–2040 Growth Forecast</b>	<b>Base Allocation</b>
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>

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#### **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



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#### ***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

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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**.

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**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.

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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.

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.

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**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.

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**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
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# APPENDIX 1

Excerpts from California Government Code Section 65584

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### **GOVERNMENT CODE - GOV**

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

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

#### **DIVISION 1. PLANNING AND ZONING [65000 - 66301]**

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

#### **CHAPTER 3. Local Planning [65100 - 65763]**

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

#### **ARTICLE 10.6. Housing Elements [65580 - 65589.11]**

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

#### 65584.

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

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

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

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

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

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

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

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

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

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

(5) Affirmatively furthering fair housing.

(e) For purposes of this section, "affirmatively furthering fair housing" means taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics. Specifically, affirmatively furthering fair housing means taking meaningful actions that, taken together, address significant disparities in housing needs and in access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws.

(f) For purposes of this section, "household income levels" are as determined by the department as of the most recent American Community Survey pursuant to the following code sections:

(1) Very low incomes as defined by Section 50105 of the Health and Safety Code.

(2) Lower incomes, as defined by Section 50079.5 of the Health and Safety Code.

(3) Moderate incomes, as defined by Section 50093 of the Health and Safety Code.

(4) Above moderate incomes are those exceeding the moderate-income level of Section 50093 of the Health and Safety Code.

(g) Notwithstanding any other provision of law, determinations made by the department, a council of governments, or a city or county pursuant to this section or Section 65584.01, 65584.02, 65584.03, 65584.04, 65584.05, 65584.06, 65584.07, or 65584.08 are exempt from the California Environmental Quality Act (Division 13 (commencing with Section 21000) of the Public Resources Code).

*(Amended by Stats. 2018, Ch. 989, Sec. 1.5. (AB 1771) Effective January 1, 2019.)*

### 65584.01.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

### 65584.02.

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

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

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

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

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

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

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

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

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

### 65584.03.

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

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

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

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

## APPENDIX 6-4

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

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

### 65584.04.

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

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

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

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

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

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

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

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



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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

### 65584.05.

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

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

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

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

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

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

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

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

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

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

(2) Issue a proposed final allocation plan.

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

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

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

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

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

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

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

# APPENDIX 2

Regional Allocation Determination Letter from HCD

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

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



June 15, 2020

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

Dear Jon Clark:

**RE: Final Regional Housing Need Determination**

This letter provides Butte County Association of Governments (BCAG) its final Regional Housing Need Determination. Pursuant to state housing element law (Government Code section 65584, et seq.), the Department of Housing and Community Development (HCD) is required to provide the determination of BCAG's existing and projected housing need.

In assessing BCAG's regional housing need, HCD and BCAG staff completed an extensive consultation process from December 2019 through May 2020 covering the methodology, data sources, and timeline for HCD's determination of the Regional Housing Need. HCD also consulted with Walter Schwarm and Doug Kuczynski of the California Department of Finance (DOF) Demographic Research Unit.

Attachment 1 displays the minimum regional housing need determination of **15,506** total units among four income categories for BCAG to distribute among its local governments. Attachment 2 explains the methodology applied pursuant to Gov. Code section 65584.01. In determining BCAG's housing need, HCD considered all the information specified in state housing law (Gov. Code section 65584.01(c)).

As you know, BCAG is responsible for adopting a methodology for RHNA allocation and RHNA Plan for the projection period beginning December 31, 2021 and ending June 15, 2030. Pursuant to Gov. Code section 65584(d), the methodology to prepare BCAG's RHNA plan must further the following objectives:

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

Pursuant to Gov. Code section 65584.04(d), to the extent data is available, BCAG shall include the factors listed in Gov. Code section 65584.04(d)(1-13) to develop its RHNA

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plan, and pursuant to Gov. Code section 65584.04(f), BCAG must explain in writing how each of these factors was incorporated into the RHNA plan methodology and how the methodology furthers the statutory objectives described above. Pursuant to Gov. Code section 65584.04(h), BCAG must submit its draft methodology to HCD for review.

Increasing the availability of affordable homes, ending homelessness, and meeting other housing goals continues to be a priority for the State of California. To support these goals, the 2019-20 Budget Act allocated \$250 million for all regions and jurisdictions for planning activities through the Regional Early Action Planning (REAP) and Local Early Action Planning (LEAP) Grant programs. BCAG has \$883,334 available through the REAP program and HCD applauds BCAG's efforts to engage early on how best to utilize these funds and HCD looks forward to continuing this collaboration. All BCAG jurisdictions are also eligible for LEAP grants and are encouraged to apply to support meeting and exceeding sixth cycle housing element goals. While the SB 2 Planning Grant deadline has passed, ongoing regionally tailored technical assistance is still available through that program as well.

The November 2018 Camp Fire in Butte County has become California's deadliest and most destructive wildfire on record and destroyed approximately 19,000 structures, including 14,000 homes. Tragically, 85 lives were lost. To assist with disaster recovery efforts both federal Community Development Block Grant – Disaster Recovery (CDBG-DR) grants and disaster-related housing tax credits are available to Butte County and its impacted jurisdictions. California was allocated \$1.02 Billion for CDBG-DR and another \$1 Billion in housing tax credits. The CDBG-DR allocation alone for Butte County is estimated to be between \$150 to \$180 Million dollars across county and municipal jurisdictions. CDBG-DR program will also support single family homeowners impacted by the Camp Fire to repair or reconstruct owner occupied housing units with grants up to \$200,000. These funds can assist with planning, infrastructure and housing needs to assist the county in meeting housing needs.

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



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

If HCD can provide any additional assistance, or if you, or your staff, have any questions, please contact Megan Kirkeby, Acting Deputy Director, at [megan.kirkeby@hcd.ca.gov](mailto:megan.kirkeby@hcd.ca.gov) or Tom Brinkhuis, Housing Policy Specialist at (916) 263-6651 or [tom.brinkhuis@hcd.ca.gov](mailto:tom.brinkhuis@hcd.ca.gov).

Sincerely,

A handwritten signature in black ink, appearing to read 'Megan Kirkeby', with a small dot at the end of the line.

Megan Kirkeby  
Acting Deputy Director

Enclosures

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ATTACHMENT 1

HCD REGIONAL HOUSING NEED DETERMINATION  
BCAG: December 31, 2021 through June 15, 2030

<u>Income Category</u>	<u>Percent</u>	<u>Housing Unit Need</u>
Very-Low*	13.4%	2,081
Low	8.3%	1,290
Moderate	20.7%	3,202
Above-Moderate	57.6%	8,933
<b>Total</b>	<b>100.0%</b>	<b>15,506</b>
* Extremely-Low	14.3%	Included in Very-Low Category

Notes:

Income Distribution:

*Income categories are prescribed by California Health and Safety Code (Section 50093, et. seq.). Percents are derived based on Census/ACS reported household income brackets and county median income and have been adjusted to account for structures lost during the Camp Fire.*

**HCD REGIONAL HOUSING NEED DETERMINATION:  
BCAG December 31, 2021 through June 15, 2030**

**Methodology**

<b>BCAG: PROJECTION PERIOD (8.5 years) HCD Determined Population, Households, &amp; Housing Unit Need</b>		
Reference No.	Step Taken to Calculate Regional Housing Need	Amount
1.	<b>Population: June 15 2030 (DOF June 30 2030 projection adjusted - .5 months to June 15 2030)</b>	239,700
2.	<i>- Group Quarters Population: June 15 2030 (DOF June 30 2028 projection adjusted - .5 months to June 15 2030)</i>	-6,035
3.	<b>Household (HH) Population</b>	233,655
4.	<b>Projected Households</b>	<b>85,750</b>
5.	+ Vacancy Adjustment (.78%)	+669
6.	+ Overcrowding Adjustment (0%)	+0
7.	+ Replacement Adjustment (.64%)	+550
8.	<i>- Occupied Units (HHs) estimated December 31, 2021</i>	-80,499
9.	+ Cost-burden Adjustment	+233
10.	+ Camp Fire Adjustment	8,803
<b>Total</b>	<b>6<sup>th</sup> Cycle Regional Housing Need Assessment (RHNA)</b>	<b>15,506</b>

Detailed background data for this chart is available upon request.

**Explanation and Data Sources**

- 1-4. Population, Group Quarters, Household Population, & Projected Households: Pursuant to Gov. Code Section 65584.01, projections were extrapolated from DOF projections. Population reflects total persons. Group Quarter Population reflects persons in a dormitory, group home, institute, military, etc. that do not require residential housing. Household Population reflects persons requiring residential housing. Projected Households reflect the propensity of persons within the Household Population to form households at different rates based on American Community Survey (ACS) trends.
5. Vacancy Adjustment: HCD applies a vacancy adjustment (standard 5% maximum to total projected housing stock) and adjusts the percentage based on the region's current vacancy percentage to provide healthy market vacancies to facilitate housing availability and resident mobility. The adjustment is the difference between standard 5% vacancy rate and regions current vacancy rate based (**4.22%**) on the 2014-2018 ACS data. For BCAG that difference is **.078%**.
6. Overcrowding Adjustment: In regions where overcrowding is greater than the U.S. overcrowding rate of 3.35%, HCD applies an adjustment based on the amount the regions overcrowding rate (**3.18%**) exceeds the U.S. overcrowding rate. Data is from the 2014-2018 ACS. For BCAG, the county overcrowding rate does not exceed the national average, therefore an adjustment is not applied.

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7. Replacement Adjustment: HCD applies a replacement adjustment between .5% and 5% to the total housing stock based on the current 10-year annual average percent of demolitions the region's local government annual reports to Department of Finance (DOF). For BCAG the 10-year annual average multiplied by the length of the projection period is **.64%**, excluding the Camp Fire year as an outlier.
8. Occupied Units: This figure reflects DOF's estimate of occupied units at the start of the projection period (December 31, 2021).
9. Cost Burden Adjustment: Cost Burden Adjustment: HCD applies an adjustment to the projected need by comparing the difference in cost-burden by income group for the region to the cost-burden by income group in the nation. The very-low and low income RHNA is increased by the percent difference ( $68.31\% - 64.23\% = 4.08\%$ ) between the region and the national cost burden rate for households earning 80% of area median income and below, then this difference is applied to very low- and low-income RHNA proportionate to the share of the population these groups currently represent. The moderate and above-moderate income RHNA is increased by the percent difference ( $14.75\% - 11.48\% = 3.27\%$ ) between the region and the national cost burden rate for households earning above 80% Area Median Income, then this difference is applied to moderate and above moderate income RHNA proportionate to the share of the population these groups currently represent. Data is from 2012-2016 CHAS.
10. Camp Fire Adjustment: HCD used data provided pursuant to Government Code 65584.01(b)(1)(I) (units lost due to a declared state of emergency) to apply a Camp Fire Adjustment. HCD used data from the Department of Finance to determine the structure type of units lost, and proportionally assigned a structure type to the 8,803 units expected to be rebuilt by BCAG. This does not represent the full estimate of units lost during the Camp Fire, only those expected to be rebuilt during the projection period. Those unit types correspond to different affordability levels, and are applied to each income category of the RHNA accordingly.

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# APPENDIX 3

RHNA Methodology Consistency Determination from HCD

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

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



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.



## APPENDIX 6-4

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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## APPENDIX 6-4

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 'Megan Kirkeby', with a stylized flourish at the end.

Megan Kirkeby  
Deputy Director

APPENDIX 6-4

# APPENDIX 4

Butte County Long-Term Regional Growth Forecasts  
2018-2040

Provisional Long-Term  
Regional Growth Forecasts  
2018 – 2040

Prepared by:  
Butte County Association of Governments  
September 2019



**BCAG**  
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*This document is available online at [www.bcag.org](http://www.bcag.org). Please direct any questions or comments to Mr. Brian Lasagna, BCAG Regional Analyst by phone or email at [blasagna@bcag.org](mailto:blasagna@bcag.org).*

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**Appendix A: Housing and Population Assumptions**

## INTRODUCTION

Approximately every four years, the Butte County Association of Governments (BCAG) prepares long-term regional growth forecasts of housing, population, and employment for the Butte County area. Once prepared, the forecasts are utilized in developing BCAG's Regional Transportation Plan (RTP), Sustainable Communities Strategy (SCS), Air Quality Conformity Determination, and Regional Housing Needs Plan and provides data support for BCAG's regional Travel Demand Model. Local land use planning agencies may also elect to utilize the forecasts for preparing district plans or city and county long range plans.

The forecasts have been prepared as the Camp Fire related impacts to population, housing, and employment are still being assessed. Therefore, these figures are provisional. Concurrently, BCAG has undertaken an effort to better understand these impacts and the associated changes to planning assumptions resulting from the Camp Fire with the preparation of a Post-Camp Fire Regional Population and Transportation Study. It is anticipated the study will be completed in early 2021, at which time the regional forecasts will be revised.

As in the past, the forecasts have been developed by BCAG in consultation with its Planning Directors Group which consists of representatives from each of BCAG's local jurisdiction members and the Butte Local Agency Formation Commission. Each of the local jurisdictions provided valuable input regarding anticipated development and related growth within their respective planning areas.

A low, medium, and high scenario has been developed for each forecast of housing, population, and employment. The use of these scenarios provides for increased flexibility when utilizing the forecast for long-term planning and alleviates some of the uncertainty inherent in long range projections.

As stated above, the regional growth forecasts will be revised upon completion of the Post-Camp Fire Regional Population and Transportation Study and incorporated into the development of BCAG's 2024 RTP/SCS.

## APPROACH

The growth forecasts presented in this document represent an update of the 2014-2040 forecasts developed during the 2014/15 fiscal year and include a revised methodology which considers the latest California Department of Finance (DOF) population projections and estimates, California Employment Development Department (EDD) job estimates, past housing production by the local jurisdictions, and preliminary housing unit loss and population re-distribution estimates resulting from the Camp Fire. As presented, the forecasts meet both state and federal transportation planning requirements.

## REGIONAL FORECASTS

In comparison to the regional forecast prepared by BCAG in 2014, the 2018 forecast presents a significantly slower growth trend. Compound annual growth rates (CAGR) for the 2018 forecasts (2018-2040) range from 0.48% to 0.88% for housing, compared to the 1.17% to 1.57% CAGR prepared in 2014 (2014-2040). This represents a 50% decrease for the medium scenario.

As observed in BCAG's past forecasts, the City of Chico is expected to see the greatest growth in housing units, followed by the unincorporated areas of Butte County and the City of Oroville. As a temporary place holder, the Town of Paradise has been given a range of housing recovery, due to the Camp Fire, at 69% (low scenario) to 106% (high scenario). As previously mentioned, these figures will be updated upon completion of the Post-Camp Fire Regional Population and Transportation Study.

In terms of population, the cities of Chico and Oroville show a significant increase between 2018 and 2020 as a result of the re-distribution of people associated with the Camp Fire with this trend reversing into 2025. By the year 2030, Chico and Oroville are again gaining in population. In contrast, the Town of Paradise shows significant growth for the 2020-2025 period. The cities of Biggs and Gridley are each projected to increase by over 40% for the long-term planning period.

Employment exceeded forecasts prepared in 2014 with a job to housing unit ratio of 0.83 achieved for 2018, compared to the 0.78 projected ratio included in 2014. In 2020, this ratio continues to increase to 0.96 as a result of the housing loss associated with the Camp Fire. By the year 2030, the area returns to its historic ratio of 0.80 and this continues into the horizon year of 2040.



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**Table 1: Housing Forecasts 2018-2040**

**Low Scenario**

Jurisdiction^	2018*	2020	2025	2030	2035	2040	Total Increase 2018-2040	Percent Increase 2018-2040	Compound Annual Growth Rate (CAGR) 2018-2040
Biggs	692	711	761	805	839	920	228	33%	1.30%
Chico	39,810	40,594	42,317	43,809	44,993	47,767	7,957	20%	0.83%
Gridley	2,517	2,593	2,799	2,978	3,120	3,453	936	37%	1.45%
Oroville	7,333	7,467	7,841	8,165	8,422	9,024	1,691	23%	0.95%
Paradise	13,091	1,856	5,035	7,000	8,038	8,994	-4,097	-31%	-1.69%
Unincorporated^^	35,910	33,256	35,333	36,916	38,029	40,232	4,322	12%	0.52%
<b>Total County</b>	<b>99,353</b>	<b>86,477</b>	<b>94,087</b>	<b>99,673</b>	<b>103,442</b>	<b>110,391</b>	<b>11,038</b>	<b>11%</b>	<b>0.48%</b>

**Medium Scenario**

Jurisdiction^	2018*	2020	2025	2030	2035	2040	Total Increase 2018-2040	Percent Increase 2018-2040	Compound Annual Growth Rate (CAGR) 2018-2040
Biggs	692	718	790	853	903	948	256	37%	1.44%
Chico	39,810	40,689	43,168	45,314	47,018	48,574	8,764	22%	0.91%
Gridley	2,517	2,622	2,920	3,177	3,381	3,567	1,050	42%	1.60%
Oroville	7,333	7,524	8,062	8,528	8,898	9,236	1,903	26%	1.05%
Paradise	13,091	1,916	6,490	9,318	10,811	11,347	-1,744	-13%	-0.65%
Unincorporated^^	35,910	33,460	36,449	38,726	40,328	41,563	5,653	16%	0.67%
<b>Total County</b>	<b>99,353</b>	<b>86,929</b>	<b>97,879</b>	<b>105,916</b>	<b>111,339</b>	<b>115,235</b>	<b>15,882</b>	<b>16%</b>	<b>0.68%</b>

**High Scenario**

Jurisdiction^	2018*	2020	2025	2030	2035	2040	Total Increase 2018-2040	Percent Increase 2018-2040	Compound Annual Growth Rate (CAGR) 2018-2040
Biggs	692	725	821	905	971	978	286	41%	1.59%
Chico	39,810	40,792	44,088	46,943	49,209	49,446	9,636	24%	0.99%
Gridley	2,517	2,654	3,049	3,391	3,663	3,692	1,175	47%	1.76%
Oroville	7,333	7,586	8,301	8,921	9,413	9,465	2,132	29%	1.17%
Paradise	13,091	1,980	8,064	11,824	13,809	13,891	800	6%	0.27%
Unincorporated^^	35,910	33,681	37,656	40,684	42,814	43,003	7,093	20%	0.82%
<b>Total County</b>	<b>99,353</b>	<b>87,418</b>	<b>101,980</b>	<b>112,668</b>	<b>119,880</b>	<b>120,474</b>	<b>21,121</b>	<b>21%</b>	<b>0.88%</b>

\* Source: State of California, Department of Finance, E-5 Population and Housing Estimates for Cities, Counties and the State, 2010-2019, with 2010 Benchmark. Sacramento, California, May 2019.

Notes:

^ Jurisdictional figures reflect anticipated new growth within the anticipated boundaries of each jurisdiction and do not reflect future annexation of existing units or as-yet-unbuilt new units in unincorporated areas to the respective cities. Assumptions about future boundaries are not intended by BCAG to be interpreted as factors limiting such jurisdictions' future boundaries.

^^ Unincorporated Butte County figures exclude forecasted growth identified in the Butte County General Plan 2030 - Environmental Impact Report as Bell Muir/Chico Area, Doe Mill/Honey Run Specific Plan, Thermalito Afterbay, Biggs Area, and Gridley Area and includes shared growth (50%) of Thermalito, Southern Oroville and Eastern Oroville.

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**Table 2: Population Forecasts 2018-2040**

**Low Scenario**

Jurisdiction^	2018*	2020	2025	2030	2035	2040	Total Increase 2018-2040	Percent Increase 2018-2040	Compound Annual Growth Rate (CAGR) 2018-2040
Biggs	1,894	2,103	2,148	2,221	2,303	2,519	625	33%	1.30%
Chico	92,861	111,631	105,472	104,133	105,550	111,421	18,560	20%	0.83%
Gridley	6,921	7,398	7,809	8,222	8,590	9,494	2,573	37%	1.45%
Oroville	18,091	21,934	20,757	20,552	20,904	22,264	4,173	23%	0.95%
Paradise	26,423	4,880	11,342	14,585	16,380	18,154	-8,269	-31%	-1.69%
Unincorporated^^	81,706	79,569	81,981	84,456	86,670	91,541	9,835	12%	0.52%
<b>Total County</b>	<b>227,896</b>	<b>227,515</b>	<b>229,508</b>	<b>234,169</b>	<b>240,398</b>	<b>255,392</b>	<b>27,496</b>	<b>12%</b>	<b>0.52%</b>

**Medium Scenario**

Jurisdiction^	2018*	2020	2025	2030	2035	2040	Total Increase 2018-2040	Percent Increase 2018-2040	Compound Annual Growth Rate (CAGR) 2018-2040
Biggs	1,894	2,123	2,230	2,354	2,477	2,595	701	37%	1.44%
Chico	92,861	111,892	107,593	107,712	110,301	113,303	20,442	22%	0.91%
Gridley	6,921	7,482	8,144	8,770	9,308	9,810	2,889	42%	1.60%
Oroville	18,091	22,102	21,342	21,466	22,086	22,785	4,694	26%	1.05%
Paradise	26,423	5,037	14,619	19,413	22,031	22,902	-3,521	-13%	-0.65%
Unincorporated^^	81,706	80,057	84,570	88,597	91,910	94,569	12,863	16%	0.67%
<b>Total County</b>	<b>227,896</b>	<b>228,694</b>	<b>238,497</b>	<b>248,313</b>	<b>258,113</b>	<b>265,964</b>	<b>38,068</b>	<b>17%</b>	<b>0.70%</b>

**High Scenario**

Jurisdiction^	2018*	2020	2025	2030	2035	2040	Total Increase 2018-2040	Percent Increase 2018-2040	Compound Annual Growth Rate (CAGR) 2018-2040
Biggs	1,894	2,145	2,318	2,498	2,665	2,677	783	41%	1.59%
Chico	92,861	112,174	109,886	111,583	115,440	115,338	22,477	24%	0.99%
Gridley	6,921	7,573	8,506	9,363	10,085	10,151	3,230	47%	1.76%
Oroville	18,091	22,283	21,976	22,455	23,364	23,350	5,259	29%	1.17%
Paradise	26,423	5,207	18,164	24,634	28,142	28,038	1,615	6%	0.27%
Unincorporated^^	81,706	80,585	87,370	93,077	97,576	97,844	16,138	20%	0.82%
<b>Total County</b>	<b>227,896</b>	<b>229,968</b>	<b>248,219</b>	<b>263,610</b>	<b>277,271</b>	<b>277,397</b>	<b>49,501</b>	<b>22%</b>	<b>0.90%</b>

\* Source: State of California, Department of Finance, E-5 Population and Housing Estimates for Cities, Counties and the State, 2010-2019, with 2010 Benchmark. Sacramento, California, May 2019.

Notes:

^Jurisdictional figures reflect anticipated new growth within the anticipated boundaries of each jurisdiction and do not reflect future annexation of existing units or as-yet-unbuilt new units in unincorporated areas to the respective cities. Assumptions about future boundaries are not intended by BCAG to be interpreted as factors limiting such jurisdictions' future boundaries.

^^ Unincorporated Butte County figures exclude forecasted growth identified in the Butte County General Plan 2030 - Environmental Impact Report as Bell Muir/Chico Area, Doe Mill/Honey Run Specific Plan, Thermalito Afterbay, Biggs Area, and Gridley Area and includes shared growth (50%) of Thermalito, Southern Oroville and Eastern Oroville.

**Table 3: Employment Forecasts 2018-2040**

**Low Scenario**

Jurisdiction	2018*	2020	2025	2030	2035	2040	Total Increase 2018-2040	Percent Increase 2018-2040
Butte County	82,900	83,018	80,915	79,738	82,753	88,313	5,413	7%

**Medium Scenario**

Jurisdiction	2018*	2020	2025	2030	2035	2040	Total Increase 2018-2040	Percent Increase 2018-2040
Butte County	82,900	83,452	84,176	84,733	89,071	92,188	9,288	11%

**High Scenario**

Jurisdiction	2018*	2020	2025	2030	2035	2040	Total Increase 2018-2040	Percent Increase 2018-2040
Butte County	82,900	83,921	87,703	90,135	95,904	96,379	13,479	16%

**Table 4: Jobs (Non-Farm) to Housing Unit Ratios 2018-2040**

Factor	2018*	2020	2025	2030	2035	2040
Jobs/Housing Unit	0.83	0.96	0.86	0.80	0.80	0.80

\* Source: State of California, Department of Finance, E-5 Population and Housing Estimates for Cities, Counties and the State, 2010-2019, with 2010 Benchmark. Sacramento, California, May 2019. California Employment Development Department, Industry Employment & Labor Force - by Annual Average, March 2018 Benchmark, for Butte County (Chico MSA).

## FORECAST METHODOLOGY

BCAG has prepared the forecasts using professionally accepted methodologies for long-range forecasting. Utilizing a “top down” approach, long-term projections prepared by the DOF were consulted for Butte County and used to re-establish control totals for the region. Additionally, a variety of data sources, including input from local jurisdictions, were reviewed and inserted at the local jurisdiction level, therefore incorporating a “bottom up” approach. Adjustments were made to compensate for the re-distribution and re-population of the Camp Fire burn area. Forecasts were then allocated into five-year increments until the year 2040. Lastly, low, medium, and high scenarios were prepared for each forecasted category.

### HOUSING

The latest DOF long range projections, as of January 2018, were analyzed for the period 2018-2040 for the Butte County region. These projections estimate that the Butte County region will add ~16,600 new housing units over the next 22 years. This information was used to establish the control total for BCAG’s medium forecast scenario.

BCAG then prepared an update of the 2014 BCAG growth forecasts utilizing 2018 base line data and the long-range forecasts from DOF. A base allocation of units at the jurisdictional level was built on each jurisdiction’s share of regional growth contained in the 2014-2040 forecasts and then balanced to historical building permit data for the 2000-2017 period. Appendix A provides details and assumptions regarding the county and jurisdiction level adjustments.

A Camp Fire adjustment was then incorporated into the methodology to account for the units lost (~14,500) within the burn area. An initial 75% re-build assumption (~10,900 units) was first applied to Town of Paradise and unincorporated portions of the burn area, followed by a secondary re-distribution of 20% (~2,900) units to all jurisdictions using the base allocation method.

The units developed at the jurisdictional level for the base allocation and Camp Fire adjustment were then combined resulting in regional Compound Annual Growth Rate (CAGR) of 0.68%. This information was used to represent the medium forecast scenario. The information was then reviewed by local agency planning staff.

Based on a 0.2 percent incremental change between the established high and medium scenarios, a low and high housing scenario were developed using a CAGR of 0.48% and 0.88%. This incremental change is identical to that included with the 2014 forecasts.

## POPULATION

Population forecasts were prepared by applying the 2018 average persons per housing unit to the housing unit forecasts. This method allows for the capture of variations in household size for each jurisdiction. As with the housing unit forecasts, a Camp Fire adjustment was made. This adjustment incorporates 2019 post-Camp Fire person per housing unit numbers then assumes 2018 averages will be re-established by the year 2040.

## EMPLOYMENT

Employment forecasts were prepared at the regional/county level only and are based on a ratio of jobs per housing unit.

Baseline 2018 and historical employment data was obtained from the California Employment Development Department (EDD) for the years 1999-2018. The EDD data provide an annual average total of all non-farm jobs for the region. This information was then used in conjunction with DOF housing unit estimates to calculate a ratio of 0.83 jobs per housing unit for the year 2018 and a ratio of 0.80 20-year (1999-2018) average.

The 20-year ratio was applied to the years 2035-2040 based on the long-term historical average. Year 2020 (0.82) and 2030 (0.81) represent a linear reduction of the 2018 average.

The ratios for year 2020 and 2025 are based on employment information from EDD which shows minimal job loss within the region as a result of the Camp Fire. These numbers, in conjunction with the regional housing losses, drive the ratio up to 0.96 for the 2020 period then return to 0.86 in 2025 as housing begins to rebound.

Lastly, the jobs to housing unit ratio developed for each 5-year period was applied to all scenarios.

Appendix A

Housing Assumptions

*Share of Regional Growth (Base Allocation)*

	A	B	C
Jurisdiction	2014 Forecasts	Building Permit History (2000-2017)	2018 Forecasts
Biggs	2.0%	0.6%	1.3%
Chico	39.3%	50.7%	45.0%
Gridley	7.4%	3.5%	5.4%
Oroville	14.4%	4.9%	9.7%
Paradise	6.3%	5.0%	5.6%
Unincorporated	30.6%	35.3%	33.0%
Total County	100.0%	100.0%	100.0%

- A. Share of regional growth used in BCAG's 2014-2040 Long-Term Regional Growth Forecasts
- B. Share of regional growth based on each jurisdiction's building permit history for the 2000-2017 period
- C. Share of regional growth developed for BCAG's 2018-2040 Long-Term Regional Growth Forecasts. Formula  $(A+B)/2=C$

*Camp Fire Adjustment*

	A	B		C	D	E	F	G	H	I
		<i>Base Allocation</i>		<i>Camp Fire Adjustment</i>						
Jurisdiction	Revised 2018 Housing Units (Jan. 1, 2018)*	Base Distribution of New Units	Base Housing Unit Growth	Estimated Housing Unit Loss (Burn Area)	75% HU Re-Build (Burn Area Only)	20% Remaining Distribution (All Jurisdictions)	Housing Unit Growth (Gross Total)	Housing Unit Growth (Net Total)	Year 2040 Housing Unit Totals	
Biggs	692	1.3%	217			38	255	255	947	
Chico	39,810	45.0%	7,474			1,304	8,779	8,779	48,589	
Gridley	2,517	5.4%	900			157	1,058	1,058	3,575	
Oroville	7,333	9.7%	1,604			280	1,884	1,884	9,217	
Paradise	13,091	5.6%	937	11,371	8,528	164	9,629	-1,742	11,349	
Unincorporated	35,910	33.0%	5,473	3,119	2,339	955	8,768	5,649	41,559	
Total	99,353	100.00%	16,606	14,490	10,868	2,898	30,372	15,882	115,235	

\* DOF E-5 City/County Population and Housing Estimates - January 1, 2018 (Updated May 2019)

- A. Year 2018 housing unit total by jurisdiction from DOF E-5 report (May 2019)
- B. Base distribution of units by jurisdictions based on historical housing production and 2014 BCAG forecasts
- C. Base housing unit growth of estimated units over 22-year planning period (2018-2040)

## APPENDIX 6-4

- D. Estimated unit loss in Camp Fire burn area by jurisdiction (source: DOF E-5 report May 2019)
- E. Camp Fire - 75% housing unit re-build applied to burn area jurisdictions
- F. Camp Fire - 20% housing unit re-distribution to all jurisdictions
- G. Gross total of housing units by jurisdiction over 22-year planning period
- H. Net total of housing units by jurisdiction over 22-year planning period
- I. Total housing units by jurisdiction for year 2040

### Population Assumptions

#### *Persons Per Housing Unit by Year*

Jurisdiction	Average Persons Per Housing Unit					
	2018*	2020	2025	2030	2035	2040
Biggs	2.74	2.96	2.82	2.76	2.74	2.74
Chico	2.33	2.75	2.49	2.38	2.35	2.33
Gridley	2.75	2.85	2.79	2.76	2.75	2.75
Oroville	2.47	2.94	2.65	2.52	2.48	2.47
Paradise	2.02	2.63	2.25	2.08	2.04	2.02
Unincorporated	2.28	2.39	2.32	2.29	2.28	2.28
Total County	2.29	2.63	2.44	2.34	2.29	2.29

\* DOF E-5 City/County Population and Housing Estimates -January 1, 2018 (Updated May 2019)

#### *Countywide Population Forecast Comparison to DOF Estimates*

	A	B	C
Year	DOF	BCAG	Meets State Requirement
2018	227,804	227,896	-
2020	230,701	228,694	YES
2025	238,538	238,497	YES
2030	247,331	248,313	YES
2035	256,034	258,113	YES
2040	263,634	265,964	YES

- A. Population projections prepared by Demographic Research Unit, California Department of Finance, January 2018
- B. BCAG Provisional Long-Term Regional Growth Forecasts 2018-2040
- C. California regulations (CA Code §65584.01) require that population forecasts used in preparing the RTP/SCS must be within +/- 1.5% of DOF numbers

# APPENDIX 5

Affirmatively Furthering Fair Housing Survey Results



Butte County Association of Governments

Regional Housing Needs Assessment

Member Jurisdiction Survey

**Survey Results**

## APPENDIX 6-4

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

Government Code specifies five objectives all RHNAs must further:

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

Additionally, Government Code identifies several factors (including some which are new for the 6<sup>th</sup> RHNA Cycle, identified in **bold**) to be included in developing the methodology that allocates regional housing needs:

1. Existing and projected jobs and housing relationship, **particularly low-wage jobs and affordable housing**
2. Lack of capacity for sewer or water service due to decisions outside jurisdiction's control
3. Availability of land suitable for urban development
4. Lands protected from urban development under existing federal or state programs
5. County policies to preserve prime agricultural land
6. Distribution of household growth in the RTP and opportunities to maximize use of transit and existing transportation infrastructure
7. Agreements to direct growth toward incorporated areas
8. Loss of deed-restricted affordable units
9. **Households paying more than 30 percent and more than 50 percent of their income in rent**
10. **The rate of overcrowding**
11. Housing needs of farmworkers
12. Housing needs generated by a university within the jurisdiction
13. **Housing needs of individuals and families experiencing homelessness**
14. **Units lost during a state of emergency that have yet to be replaced**
15. **The region's GHG targets**

The survey questions, which are each related to one of the above listed Factors or Objectives, were intended to gather information to inform the RHNA pursuant to the law. The table depicted on page 3 of this report, was included in the Survey to display data that had been gathered to date; survey Question 6 asks respondents to identify data points, in addition to those listed in the table, which would be important to inform the RHNA.

## APPENDIX 6-4

If a jurisdiction provided information, the survey asked that it be provided in a format that would be comparable across all jurisdictions.

### **Results Summary**

Four respondents representing the following four jurisdictions submitted complete surveys:

- Butte County
- City of Chico
- City of Oroville
- Town of Paradise

Chico and Paradise respondents noted that they keep databases with records of approved residential development

Butte County respondents emphasized the importance of temporary housing unit data. This information is readily available online for Butte County and for the Town of Paradise.

Butte County noted two additional data sources:

1. Information regarding farmworkers in Butte County from the 2014 Regional Housing Needs Assessment, and
2. Housing Policies being considered by the Butte County Board of Directors, like SRO preservation policies.

Raw survey results are provided after the original data collection table, followed by the original full survey text.



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

Have Data  
 Information needed

## Town of Paradise

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### Participant Information

Jurisdiction: Town of Paradise

Survey Respondent Name: Susan Hartman

Survey Respondent Title: Community Development Director

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### 6TH CYCLE RHNP REQUIRED OBJECTIVES AND FACTORS

**Q6**

**No**

Are there additional data points that are important to consider in developing the BCAG RHNP?

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**Q7**

Are you familiar with any data sources that might be relevant to this effort and provide information post-Camp Fire?

If yes, please list all. :

**The Town's Building Dept can provide reports on approved residential development.**

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HOUSING OPPORTUNITIES AND CONSTRAINTS

**Q8**

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

Water Capacity	<b>Constraint</b>
Land Suitability	<b>Opportunity</b>
Construction costs	<b>Constraint</b>
Availability of construction workforce	<b>Constraint</b>
Availability of vacant land	<b>Opportunity</b>

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

Water capacity is a constraint at this time because of the damage done to the water distribution system by the Camp Fire. Repairs are being made, but funding at a State level is also in jeopardy. Land suitability is an opportunity because there is a lot of empty residential lots for sale that already have underground improvements (gas lines/septic/electrical) that make redevelopment of the parcels more streamlined than the average vacant lot. Also, there are vacant mobile home parks for sale that buyers may be interested in converting to multi-family housing instead. Construction costs and availability of construction workforce is a constraint because the construction demand that the Camp Fire and Carr Fire has placed on the industry in the Northstate, along with the regular Chico development, has put a strain on available resources and those resources now come at a premium. Availability of vacant land - again, like 'land suitability', there is a surplus of vacant residential land that is for sale in Paradise as a result of the Camp Fire.

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**Q9**

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

**Energy efficiency standards in new construction or retrofits**  
**Investment in pedestrian, bicycle, and active transportation infrastructure**

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**Q10**

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

**No**

**Q11**

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

**Local gap financing for affordable housing development**

**Other** (please specify):

**High density housing of any affordability is difficult to achieve in Paradise as the entire town is on individual septic systems and wastewater discharge rates for both standard and secondary treatment require quite a bit of land.**

**Q12**

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

**No**

**Q13**

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

**Respondent skipped this question**

QUESTIONS ABOUT FAIR HOUSING ISSUES, GOALS, AND ACTIONS

**Q14**

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

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

**Other** (please explain):

**Limited wastewater capacities**

**Q15**

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

**Funding rehabilitation and accessibility improvements for low-income homeowners**

**Q16**

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

Condominium conversion regulations

**In Use**

Promoting streamlined processing of ADUs

**Potential Council/Board Interest**

## City of Chico

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### Participant Information

Jurisdiction: City of Chico  
Survey Respondent Name: Brendan Vieg  
Survey Respondent Title: Community Development  
Director

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### 6TH CYCLE RHNP REQUIRED OBJECTIVES AND FACTORS

#### **Q6**

Are there additional data points that are important to consider in developing the BCAG RHNP? If so, please specify.

**Yes.**

**The City of Chico has Residential "Pipeline" data that identifies proposed, approved, and under construction units for both single-family and multi-family residential development. The City of Chico prepared a Land Absorption Study in 2018 that identified infill housing potential.**

---



**Q7**

Are you familiar with any data sources that might be relevant to this effort and provide information post-Camp Fire? If yes, please list all.

Yes.

**Local Economist Richard Hunt has been preparing a regional analysis of housing demand for the Camp Fire Long-Term Recovery Group - Housing Committee. CalOES has also prepared Recovery Reports that include housing data and needs.**

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**HOUSING OPPORTUNITIES AND CONSTRAINTS**

**Q8**

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

Water Capacity	<b>Opportunity, Constraint</b>
Land Suitability	<b>Constraint</b>
Lands protected by federal or State programs	<b>Constraint</b>
County policies to preserve agricultural land	<b>Constraint</b>
Availability of schools	<b>Opportunity</b>
Availability of parks	<b>Opportunity</b>
Availability of public or social services	<b>Opportunity, Constraint</b>
Impact of climate change and natural hazards	<b>Opportunity, Constraint</b>
Construction costs	<b>Constraint</b>
Availability of construction workforce	<b>Constraint</b>
Availability of surplus public land	<b>Constraint</b>
Availability of vacant land	<b>Opportunity, Constraint</b>
Financing/funding for affordable housing	<b>Opportunity, Constraint</b>
Utility connection fees	<b>Constraint</b>

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

**The majority of things listed above have some bearing on development potential simply as a matter of fact.**

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**Q9**

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

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

**Investment in maintaining or improving existing public transportation infrastructure**

**Investment in pedestrian, bicycle, and active transportation infrastructure**

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

**Land use changes to allow greater density near transit, Incentives or policies to encourage housing development on vacant or underutilized land near transit**

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

**Implementing a Climate Action Plan,**

**Other (please specify):**

**The City of Chico has created a "standing" Climate Action Commission, funded a planner position to support the Commission, and is currently updating its Climate Action Plan to be consistent with State GHG emission reduction goals. The City of Chico and Butte County are also developing a Community Choice Aggregation.**

---

**Q10**

Does your jurisdiction collect data on homelessness within the jurisdiction and demand for transitional housing for those experiencing homelessness? If so, please provide an estimate for the local homeless population and corresponding need for transitional housing.

**Yes.**

**I provided consultant with the most recent Point in Time Homelessness Count report.**

---

**Q11**

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

**Local gap financing for affordable housing development**

**Local affordable housing development capacity**

**Availability of land**

**Construction costs and labor pool; affordability of suitable land**

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**Q12**

**No**

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

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**Q13**

**No Demand**

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

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## QUESTIONS ABOUT FAIR HOUSING ISSUES, GOALS, AND ACTIONS

**Q14**

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

**Community opposition to proposed or existing developments**

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

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

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

**Access to financial services**

**Availability, frequency, and reliability of public transit**

**Range of job opportunities available**

**People with disabilities report difficulty in finding appropriate housing**

---

**Q15**

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

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

**Dedicated local funding source for affordable housing development**

**Support for affordable housing development near transit**

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

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

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

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

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

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

**Funding rehabilitation and accessibility improvements for low-income homeowners**

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

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

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

---

**Q16**

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

Rent stabilization/rent control	<b>In Use</b>
Single-room occupancy (SRO) preservation	<b>In Use</b>
Condominium conversion regulations	<b>In Use</b>
Inclusionary zoning	<b>Potential Council/Board Interest</b>
Community land trusts	<b>Potential Council/Board Interest</b>
Promoting streamlined processing of ADUs	<b>In Use</b>
Fair housing legal services	<b>In Use</b>
Acquisition of affordable units with expiring subsidies	<b>In Use</b>
Dedicating surplus land for affordable housing	<b>In Use</b>

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## Butte County

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### Participant Information

Jurisdiction: Butte County

Survey Respondent Name: Daniel Breedon

Survey Respondent Title: Planning Manager

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### 6TH CYCLE RHNP REQUIRED OBJECTIVES AND FACTORS

#### **Q6**

Are there additional data points that are important to consider in developing the BCAG RHNP? If so, please specify.

**Yes.**

**Ensuring that an accurate count of those living in temporary housing (e.g., travel trailers) as allowed under temporary circumstances in the wake of the Camp Fire is provided. These could be in both incorporated and unincorporated areas, and areas within the boundary of the Camp Fire and those outside of it.**

**Q6**

Are there additional data points that are important to consider in developing the BCAG RHNP? If so, please specify.

**Yes. Ensuring that an accurate count of those living in temporary housing (e.g., travel trailers) as allowed under temporary circumstances in the wake of the Camp Fire is provided. These could be in both incorporated and unincorporated areas, and areas within the boundary of the Camp Fire and those outside of it.**

---

**Q7**

Are you familiar with any data sources that might be relevant to this effort and provide information post-Camp Fire? If yes, please list all.

**Yes. The County maintains a data base on permits that have been issued for temporary housing in the unincorporated area. Post Camp Fire Regional Population & Transportation Study - Not sure of status.**

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HOUSING OPPORTUNITIES AND CONSTRAINTS

**Q8**

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

Water Capacity	<b>Constraint</b>
Land Suitability	<b>Constraint</b>
Lands protected by federal or State programs	<b>Constraint</b>
County policies to preserve agricultural land	<b>Constraint</b>
Availability of schools	<b>Constraint</b>
Availability of parks	<b>Constraint</b>
Availability of public or social services	<b>Opportunity, Constraint</b>
Impact of climate change and natural hazards	<b>Constraint</b>
Construction costs	<b>Constraint</b>
Availability of construction workforce	<b>Constraint</b>
Availability of surplus public land	<b>Constraint</b>
Availability of vacant land	<b>Constraint</b>
Financing/funding for affordable housing	<b>Constraint</b>
Weak market conditions	<b>Constraint</b>
Project labor agreements	<b>Constraint</b>
Utility connection fees	<b>Constraint</b>

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

**While the county provides many services to the County as a whole, including services to incorporated cities, as an unincorporated jurisdiction Butte County does not provide services necessary for urban development in most areas. Local utility districts, especially in the south Oroville area provide water and sewer services to the unincorporated areas of the County. Even in these areas districts have constraints related to service that hinder urban development. The majority of the County requires service with on-site septic systems and domestic wells. This does not allow for the urban densities necessary for affordable housing. Butte County has designated vast areas for agricultural protection, the lifeblood of our economy. These areas are protected through strong policies set forth in the General Plan. Many of these areas are protected through individual Williamson Act contracts that prohibit non-agricultural uses. Foothill and mountain areas are prone to wildland fire risk, ingress and egress constraints for residents and emergency responders. These areas are also important watersheds, and offer important habitat, including for endangered species.**

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**Q9**

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

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

**Investment in pedestrian, bicycle, and active transportation infrastructure**

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

**Land use changes to allow greater density near transit,**

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

**Implementing a Climate Action Plan**

---

**Q10**

Does your jurisdiction collect data on homelessness within the jurisdiction and demand for transitional housing for those experiencing homelessness? If so, please provide an estimate for the local homeless population and corresponding need for transitional housing.

**Yes. Butte County participates in the Continuum of Care report.**

**Q11**

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

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

**Local gap financing for affordable housing development**

**Local affordable housing development capacity,**

**Limited water and sewer service providers to allow for urban densities.**

---

**Q12**

Over the course of a typical year, is there a need in your jurisdiction for housing for farmworkers?  
If so, what is the total existing need for housing units for farmworkers in your jurisdiction, what portion of this need is currently unmet, and what is the data source for this information?:

**Yes. Farmworker data indicate that approximately 5,021 persons work as either full-time or seasonal employees in Butte County. Butte County has a fluctuating population of seasonal workers as well as a small base of workers who work more than 150 days a year in farm labor. The needs of seasonal workers may be met with farm labor camps, but farmworkers who choose to reside in the county year-round need long-term affordable housing. (2014 Housing Needs Assessment)**

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**Q13**

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

**Local affordable housing development capacity**

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QUESTIONS ABOUT FAIR HOUSING ISSUES, GOALS, AND ACTIONS

**Q14**

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

**Community opposition to proposed or existing developments**

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

**Location of affordable housing,**

**Lack of community revitalization strategies,**

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

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

**Location of employers,**

**Creation and retention of high-quality jobs,**

**Range of job opportunities available,**

**CEQA and the land use entitlement process**

---

**Q15**

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

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

**Dedicated local funding source for affordable housing development**

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

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

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

**Funding rehabilitation and accessibility improvements for low-income homeowners**

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

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**Q16**

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

Single-room occupancy (SRO) preservation

Other (please specify)

**Potential Council/Board Interest**

**Butte County Administration may have a better understanding of these programs and the County's involvement.**

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## City of Oroville

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### Participant Information

Jurisdiction: City of Oroville  
Survey Respondent Name: Dawn Nevers  
Survey Respondent Title: Assistant Community Development  
Director

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### 6TH CYCLE RHNP REQUIRED OBJECTIVES AND FACTORS

**Q6**

**No**

Are there additional data points that are important to consider in developing the BCAG RHNP?

---

**Q7**

Are you familiar with any data sources that might be relevant to this effort and provide information post-Camp Fire?

If yes, please list all. :

**Fluctuation in populations**

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**HOUSING OPPORTUNITIES AND CONSTRAINTS**

**Q8**

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

- |   |                                |
|---|--------------------------------|
| Land Suitability                          | <b>Opportunity</b>             |
| Availability of public or social services | <b>Opportunity, Constraint</b> |
| Availability of construction workforce    | <b>Opportunity, Constraint</b> |
| Availability of surplus public land       | <b>Opportunity</b>             |
| Availability of vacant land               | <b>Opportunity Constraint</b>  |
| Financing/funding for affordable housing  |                                |
| Utility connection fees                   |                                |

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

**Land Suitability: Oroville has plenty of suitable land for housing of all types, an opportunity; Availability of public/social services: Oroville is the County seat, location of a plethora of county-provided services. There are also a number of churches, religious organizations, and nonprofits providing these services as well; Availability of construction workforce: Oroville has a large workforce suitable for construction trades, but since the Camp Fire there has been a shortage, and most of the construction workforce has been imported; Availability of surplus public land: Oroville owns a few parcels suitable for housing development and is actively working with affordable housing developers. This is an opportunity. The constraint is that there are very few such parcels; Availability of vacant land: Oroville has plenty of land suitable for housing of all types, an opportunity. In addition, there is plenty of additional vacant land adjacent to the city, in Thermalito, South Oroville, and north of the River; Financing for affordable housing: Oroville has long had First Time Home Buyer and housing rehab programs, plus there is plenty of new money coming from the State and Federal Government; Utility connection fees: A constraint because they tend to be significant, and often are a deal killer for an otherwise worthy project.**

**Q9**

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

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

**Investment in pedestrian, bicycle, and active transportation infrastructure**

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

**Implementing a Climate Action Plan**

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**Q10**

No

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

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**Q11**

**Local gap financing for affordable housing development**

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

**Other** (please specify):

**Economic conditions (Recession, COVID, etc.)**

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**Q12**

No

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

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**Q13**

Other (please specify):

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

N/A

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## QUESTIONS ABOUT FAIR HOUSING ISSUES, GOALS, AND ACTIONS

**Q14**

**Community opposition to proposed or existing developments**

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

**Deteriorated or abandoned properties**

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

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

**Lack of regional cooperation**

**Availability, frequency, and reliability of public transit**

**Creation and retention of high-quality jobs**

**Range of job opportunities available**

**The impacts of natural hazards, such as wildfires**

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**Q15**

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

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

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

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

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

**Funding rehabilitation and accessibility improvements for low-income homeowners**

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

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

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**Q16**

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

Condominium conversion regulations

**In Use**

Promoting streamlined processing of ADUs

**Under Council/Board Consideration**

Housing counseling

**In Use**

Dedicating surplus land for affordable housing

**In Use**

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Butte County Association of Governments

Regional Housing Needs Assessment

Member Jurisdiction Survey

**Survey Full Text**



## BCAG 6th Cycle RHNP Survey

### Introduction

The Regional Housing Needs Allocation Plan (RHNP) is governed by California Government Code. Section 65584.04(b) (1) states that “each council of governments shall survey each of its member jurisdictions to request, at a minimum, information regarding the factors listed in subdivision (e) that will allow the development of a methodology based upon the factors established in subdivision (e).” In other words, each Council of Governments must survey its member jurisdictions to gather data based on a set of required Factors for analysis in the RHNP development. These are listed below (including some which are new for the 6th RHNA Cycle, identified in bold):

1. Existing and projected jobs and housing relationship, particularly low-wage jobs and affordable housing
2. Lack of capacity for sewer or water service due to decisions outside jurisdiction’s control
3. Availability of land suitable for urban development
4. Lands protected from urban development under existing federal or state programs
5. County policies to preserve prime agricultural land
6. Distribution of household growth in the RTP and opportunities to maximize use of transit and existing transportation infrastructure
7. Agreements to direct growth toward incorporated areas
8. Loss of deed-restricted affordable units
9. Households paying more than 30 percent and more than 50 percent of their income in rent
10. The rate of overcrowding
11. Housing needs of farmworkers
12. Housing needs generated by a university within the jurisdiction
13. Housing needs of individuals and families experiencing homelessness
14. Units lost during a state of emergency that have yet to be replaced
15. The region’s GHG targets

Pursuant to the law, the questions in this survey ask about each of the above listed Factors to gather information which will inform the RHNP. Each question identifies the data already obtained that relate to the Factor, so that respondents may focus responses on filling in any data gaps. If a jurisdiction provides information, it should be in a format that is comparable across all jurisdictions.

**Note:** None of the information received may be used as a basis for reducing the total housing need established for the region pursuant to Government Code Section 65584.01.

BCAG 6th Cycle RHNP Survey

Participant Information

\* 1. Name

\* 2. Jurisdiction

\* 3. Title

\* 4. Phone Number

\* 5. email Address



## APPENDIX 6-4

\* 6. Are there additional data points that are important to consider in developing the BCAG RHNP?

Yes

No

If so, please specify.

7. Are you familiar with any data sources that might be relevant to this effort and provide information post-Camp Fire?

Yes

No

If yes, please list all.

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BCAG 6th Cycle RHNP Survey

**HOUSING OPPORTUNITIES AND CONSTRAINTS**

**The following questions are aimed at understanding existing opportunities and constraints to meeting the local jurisdiction's housing needs.**

8. Which of the following apply to your jurisdiction as either an opportunity or a constraint for development of additional housing by 2030?

You can indicate that something is both an opportunity and a constraint, or leave both boxes unchecked if the issue does not have an impact on housing development in your jurisdiction. Check all that apply.

	Opportunity	Constraint
Water Capacity	<input type="checkbox"/>	<input type="checkbox"/>
Land Suitability	<input type="checkbox"/>	<input type="checkbox"/>
Lands protected by federal or State programs	<input type="checkbox"/>	<input type="checkbox"/>
County policies to preserve agricultural land	<input type="checkbox"/>	<input type="checkbox"/>
Availability of schools	<input type="checkbox"/>	<input type="checkbox"/>
Availability of parks	<input type="checkbox"/>	<input type="checkbox"/>
Availability of public or social services	<input type="checkbox"/>	<input type="checkbox"/>
Impact of climate change and natural hazards	<input type="checkbox"/>	<input type="checkbox"/>
Construction costs	<input type="checkbox"/>	<input type="checkbox"/>
Availability of construction workforce	<input type="checkbox"/>	<input type="checkbox"/>
Availability of surplus public land	<input type="checkbox"/>	<input type="checkbox"/>
Availability of vacant land	<input type="checkbox"/>	<input type="checkbox"/>
Financing/funding for affordable housing	<input type="checkbox"/>	<input type="checkbox"/>
Weak market conditions	<input type="checkbox"/>	<input type="checkbox"/>
Project labor agreements	<input type="checkbox"/>	<input type="checkbox"/>
Utility connection fees	<input type="checkbox"/>	<input type="checkbox"/>

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

## APPENDIX 6-4

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

Check all that apply.

- Energy efficiency standards in new construction or retrofits
- Investment in transit expansion
- Investment in maintaining or improving existing public transportation infrastructure
- Investment in pedestrian, bicycle, and active transportation infrastructure
- Land use changes that encourage a diversity of housing types and/or mixed-use development
- Land use changes to allow greater density near transit
- Incentives or policies to encourage housing development on vacant or underutilized land near transit
- Changes to parking requirements for new residential and/or commercial construction
- Increasing local employment opportunities to reduce commute lengths for residents
- Implementing a Climate Action Plan
- Other (please specify)

APPENDIX 6-4

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

- Yes
- No

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

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

Check all that apply.

- Land use and zoning laws, such as minimum lot sizes, limits on multi-unit properties, height limits, or minimum parking requirements
- Local gap financing for affordable housing development
- Local affordable housing development capacity
- Availability of land
- Community opposition
- Other (please specify)

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

- Yes
- No

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

## APPENDIX 6-4

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

- Land use and zoning laws, such as minimum lot sizes, limits on multi-unit properties, height limits, or minimum parking requirements
- Lack of gap financing for affordable housing development
- Local affordable housing development capacity
- Availability of land
- Community opposition
- Other (please specify)



BCAG 6th Cycle RHNP Survey

QUESTIONS ABOUT FAIR HOUSING ISSUES, GOALS, AND ACTIONS

As a result of recent legislation, RHNA and local Housing Elements are now required to “affirmatively further fair housing” [Government Code Section 65584(d)]. Per Government Code 65584(e), affirmatively furthering fair housing is defined as “taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics. Specifically, affirmatively furthering fair housing means taking meaningful actions that, taken together, address significant disparities in housing needs and in access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws.”

To comply with this requirement, BCAG is REQUIRED to collect information on local jurisdictions’ fair housing issues as well as strategies and actions for achieving fair housing goals.

## APPENDIX 6-4

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

Check all that apply.

- Community opposition to proposed or existing developments
- Displacement of residents due to increased rents or other economic pressures
- Displacement of low-income residents and/or residents of color
- Displacement of residents due to natural hazards, such as wildfires
- Land use and zoning laws, such as minimum lot sizes, limits on multi-unit properties, height limits, or minimum parking requirements
- Occupancy standards that limit the number of people in a unit
- Location of affordable housing
- The availability of affordable units in a range of sizes (especially larger units)
- Foreclosure patterns
- Deteriorated or abandoned properties
- Lack of community revitalization strategies
- Lack of private investments in low-income neighborhoods and/or communities of color, including services or amenities
- Lack of public investments in low-income neighborhoods and/or communities of color, including services or amenities
- Lack of regional cooperation
- Access to financial services
- Lending discrimination
- Location of employers
- Location of environmental health hazards, such as factories or agricultural production
- Availability, frequency, and reliability of public transit
- Access to healthcare facilities and medical services
- Access to grocery stores and healthy food options
- Location of proficient schools and school assignment policies
- Creation and retention of high-quality jobs
- Range of job opportunities available
- The impacts of natural hazards, such as wildfires
- CEQA and the land use entitlement process
- Private discrimination, such as residential real estate "steering"
- Other (please explain)

**APPENDIX 6-4**

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

Check all that apply.

- Land use changes to allow a greater variety of housing types
- Dedicated local funding source for affordable housing development
- Support for affordable housing development near transit
- Support for the development of larger affordable housing units that can accommodate families (2- and 3-bedroom units, or larger)
- Support for the development of affordable housing for special needs populations (seniors, the disabled, those experiencing homelessness, those with mental health and/or substance abuse issues, etc.)
- Support for the development of affordable housing on publicly-owned land
- Exploring partnerships with Community Development Financial Institutions, large regional employers, and investors to add to the financial resources available for the creation and preservation of deed-restricted affordable housing units
- Funding and supporting outreach services for homeowners and renters at risk of losing their homes and/or experiencing fair housing impediments
- Providing financial support or other resources for low-income home buyers
- Funding rehabilitation and accessibility improvements for low-income homeowners
- Providing incentives for landlords to participate in the Housing Choice Voucher program
- Streamlining entitlements processes and/or removing development fees for affordable housing construction
- Inclusionary zoning or other programs to encourage mixed-income developments
- Financial resources or other programs to support the preservation of existing affordable housing
- Ensuring affirmative marketing of affordable housing is targeted to all segments of the community
- Implementing a rent stabilization policy and staffing a rent stabilization board
- Implementing policies and programs to minimize the displacement of low-income residents and residents of color
- Improving access to high quality education opportunities for vulnerable students, particularly students of color
- Other (please specify)

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

Check all that apply:

	In Use	Under Council/Board Consideration	Potential Council/Board Interest
Rent stabilization/rent control	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

## APPENDIX 6-4

	In Use	Under Council/Board Consideration	Potential Council/Board Interest
Rent review board and/or mediation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Mobile home rent control	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Single-room occupancy (SRO) preservation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Condominium conversion regulations	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Foreclosure assistance	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Affordable housing impact/linkage fee on new residential development	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Affordable housing impact/linkage fee on new commercial development	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Inclusionary zoning	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Community land trusts	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
First source hiring ordinances	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Living wage employment ordinances	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Promoting streamlined processing of ADUs	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Fair housing legal services	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Housing counseling	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Acquisition of affordable units with expiring subsidies	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Acquisition of unsubsidized properties with affordable rents	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Dedicating surplus land for affordable housing	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other (please specify)			

BCAG 6th Cycle RHNP Survey

Thank You

**Thank you for taking the time to complete this survey. Your responses will help inform development of the 6th Cycle RHNP for the BCAG region. If you have any questions, please contact Chris Devine, BCAG Planning Manager, at [CDevine@bcag.org](mailto:CDevine@bcag.org).**

# APPENDIX 6

## Public Outreach and Notices

### Included:

#### Press Releases

- June 1, 2020 – BCAG RHNP 2020 Update Underway
- August 19, 2020 – Methodology Public Hearing

#### Stakeholder Workshop Materials

- May 19, 2020 Stakeholder Workshop Presentation Slides

**FOR IMMEDIATE RELEASE**

Jon Clark  
Chris Devine  
Butte County Association of Governments  
Phone: (530) 809-4616  
Email: [jclark@bcag.org](mailto:jclark@bcag.org)  
[cdevine@bcag.org](mailto:cdevine@bcag.org)

## **BCAG Regional Housing Needs Plan 2020 Update Underway**

**June 1, 2020 (Chico, California)** — The Butte County Association of Governments (BCAG) has initiated the 2020 update of the BCAG Regional Housing Needs Plan. This plan is required by California Government Code Section 65584, and must be updated every eight (8) years. It 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 five 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.

BCAG is coordinating the development of the update with planning staff from the five municipalities and the County, as well as through outreach to key stakeholder groups and the general public. Anyone interested in being included as a stakeholder in the process and receiving notifications and information related to the project should contact BCAG Planning Manager Chris Devine at [cdevine@bcag.org](mailto:cdevine@bcag.org).

If you would like more information, please call BCAG Planning Manager Chris Devine or BCAG Executive Director Jon Clark or at (530) 809-4616 or via email at [cdevine@bcag.org](mailto:cdevine@bcag.org) or [jclark@bcag.org](mailto:jclark@bcag.org).

More information on the BCAG 2020 Regional Housing Needs Plan update can be found at <http://www.bcag.org/Planning/Regional-Housing-Need-Plan/2020-Regional-Housing-Need-Plan/index.html>.

###

**FOR IMMEDIATE RELEASE**

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[cdevine@bcag.org](mailto:cdevine@bcag.org)

## **BCAG Regional Housing Needs Plan 2020 Update - Draft Allocation Methodology Public Hearing**

**August 19, 2020 (Chico, California)** — The Butte County Association of Governments (BCAG) has initiated the 2020 update of the BCAG Regional Housing Needs Plan. This plan is required by California Government Code Section 65584, and must be updated every eight (8) years. It 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 five 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.

BCAG is coordinating the development of the update with planning staff from the five municipalities and the County, as well as through outreach to key stakeholder groups and the general public. A draft allocation methodology has been completed and sent to HCD as required, and a public hearing will be held at the BCAG Board of Directors Meeting at 9:00am on August 27<sup>th</sup>, 2020 in the BCAG Board Room located at 326 Huss Drive, Suite 150 in Chico, CA.

If you would like more information, please call BCAG Planning Manager Chris Devine or BCAG Executive Director Jon Clark or at (530) 809-4616 or via email at [cdevine@bcag.org](mailto:cdevine@bcag.org) or [jclark@bcag.org](mailto:jclark@bcag.org).

More information on the BCAG 2020 Regional Housing Needs Plan update can be found at <http://www.bcag.org/Planning/Regional-Housing-Need-Plan/2020-Regional-Housing-Need-Plan/index.html>.

###





Butte County Association of Governments

# 6th Cycle Regional Housing Needs Plan (RHNP)

May 19, 2020

Stakeholder Workshop



View of the La Vigne neighborhood  
by Wikimedia Commons User: Cullen328 (CC BY 3.0)  
(image cropped and rotated)  
[creativecommons.org/licenses/by/3.0/](https://creativecommons.org/licenses/by/3.0/)

# What is the Regional Housing Needs Plan (RHNP)

- » The RHNP establishes the number of housing units at specified affordability levels (four income ranges) a jurisdiction must plan for in its Housing Element
- » The number of housing units assigned is based on anticipated population growth and replacement unit needs from fire loss
- » As the region's Metropolitan Planning Organization, BCAG is responsible for developing the region's RHNP
- » The RHNP covers an eight-year period of growth and is updated every 8 years
- » The 6<sup>th</sup> Cycle RHNP will cover the planning period from June 2022 to June 2030

# RHNP Process

- » State assigns housing needs to regions
- » Regions assign needs to local jurisdictions (cities, towns, and counties)
- » Local jurisdictions prepare Housing Elements
- » Housing units are built consistent with the Housing Element and other applicable plans/codes

# Required Objectives

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

# Factors Required for Consideration

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

**Items highlighted in yellow are new for the 6<sup>th</sup> cycle**



# Data Collection

## » Data collection is underway

## » Initial data list includes:

- Growth projections
- Existing housing supply
- Camp fire housing loss
- Housing types
- Housing tenure
- Housing affordability
- Homelessness
- Infill development potential
- Environmental resources
- Agricultural resources
- Fire hazards
- Housing-related vehicle miles traveled (VMT)
- Overall jobs-housing balance
- Jobs-housing match (between low-wage jobs and affordable housing)
- Racial distribution
- Racial diversity
- Housing cost burden
- Overcrowding
- Farmworker employment, residential locations and housing need

# RHNP Work Plan

## » Task 1: Project Kick-Off

- 1.1 Project Kick-Off Meeting
- 1.2 PDG Meeting #1
- 1.3 Initial Data Collection

## » Task 2: Member Jurisdiction Survey

## » Task 3: Methodology Development

- 3.1 Stakeholder Input Sessions
- 3.2 Data Assembly and Review
- 3.3 Potential Factors, Weighting and Formulas

## » Task 4: Formal Methodology Update

- 4.1 Draft Methodology
- 4.2 Public Hearing
- 4.3 Final Methodology

## » Task 5: RHNP Preparation

- 5.1 Draft RHNP
- 5.2 Final RHNP
- 5.3 RHNP Adoption

# RHNP Schedule

APPENDIX 6-4

2020 Delivery

## Task 1 Project Kick-Off

Planning Directors Kick-Off

April 23, 2020

## Task 2 Member Jurisdictions Survey

Member Jurisdiction Data Survey

May 2020

## Task 3 Allocation Methodology Development

Stakeholder Meeting

May 19, 2020

BCAG Board Meeting

May 28, 2020

Data Assembly

May 2020

Planning Directors Meeting # 2: Data review and preliminary factors discussion

May 28, 2020

Develop Formulas

Early June 2020

Planning Directors #3: Review factors and allocation formulas

June 25, 2020

## Task 4 Formal Allocation Methodology Update

Develop Proposed Methodology

July 2020

Planning Directors #4: Review Proposed Methodology

July 23, 2020

Public Hearing

Early August 2020

Draft Methodology

Early August 2020

Submit HCD 60-Day Review

August 10-October 10

## Task 5 RHNP Preparation

Write Draft RHNP

August 10-October 10

Finalize methodology and draft RHNP (after HCD comments received)

October 15, 2020

Planning Directors #5: Review RHNP

October 22, 2020

Final Edits

November 2020

RHNP Adoption (coincides with RTP adoption)

December 10, 2020

Housing Element Adoption Deadline (per State law)

June 12, 2022



# Your Input on Objectives and Factors

## OBJECTIVES

1. Increased Supply and Affordability of Housing
2. Environmental Justice
3. Jobs-Housing Balance
4. Affordability Balance
5. Affirmatively Further Fair Housing

## FACTORS

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



APPENDIX 6-4



**BCAG**  
BUTTE COUNTY ASSOCIATION  
OF GOVERNMENTS



**PLACEWORKS**