



SACOG Regional Housing Needs Plan

Cycle 6 (2021-2029)

Adopted March 2020



SACOG

Sacramento Area
Council of
Governments

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Provide leadership and a dynamic, collaborative public forum for achieving an efficient regional transportation system, innovative and integrated regional planning, and high quality of life within the greater Sacramento region.

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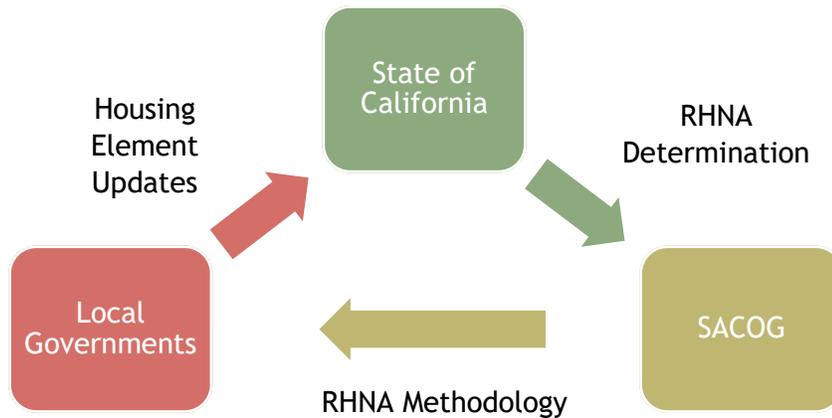
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EXECUTIVE SUMMARY

PROCESS

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

1. *Regional Determination:* The State Department of Housing and Community Development (HCD) provides each region a Regional Determination of housing need, which includes a total number of units split into four income categories. HCD provided SACOG a Regional Determination for Cycle 6 of RHNA (2021-2029) of 153,512 units.
2. *RHNA Methodology:* Councils of Governments, including SACOG, are responsible for developing a RHNA Methodology for allocating the Regional Determination to each city and county in the COG's region. This methodology must further a series of state objectives.
3. *Housing Element Updates:* Each city and county must then adopt a housing element that demonstrates, among other things, how the jurisdiction can accommodate its assigned RHNA number through its zoning. The state reviews each jurisdiction's housing element for compliance with state law.



This document provides an overview of the RHNA state process and describes the Adopted RHNA Methodology, including the RHNA objectives and factors, methodology framework, adjustment factors, and resulting allocations by income category.

IMPORTANCE OF RHNA FOR LOCAL GOVERNMENTS

The RHNA methodology will assign housing units to each jurisdiction in the SACOG region, broken down into four income categories: very low-, low-, moderate- and above moderate-income (see table below for a breakdown of how these categories are defined in terms of median income). Following the assignment of housing units, jurisdictions in the SACOG region must adopt a housing element by August 2021 that demonstrates, among other things, how they can accommodate the assigned RHNA numbers through zoning.

Income Category	Household Income Bucket (Based on Area Median Income)
Above Moderate Income	(120+%)
Moderate Income	(80-120%)
Low Income	(50-80%)
Very Low Income	(<50%)

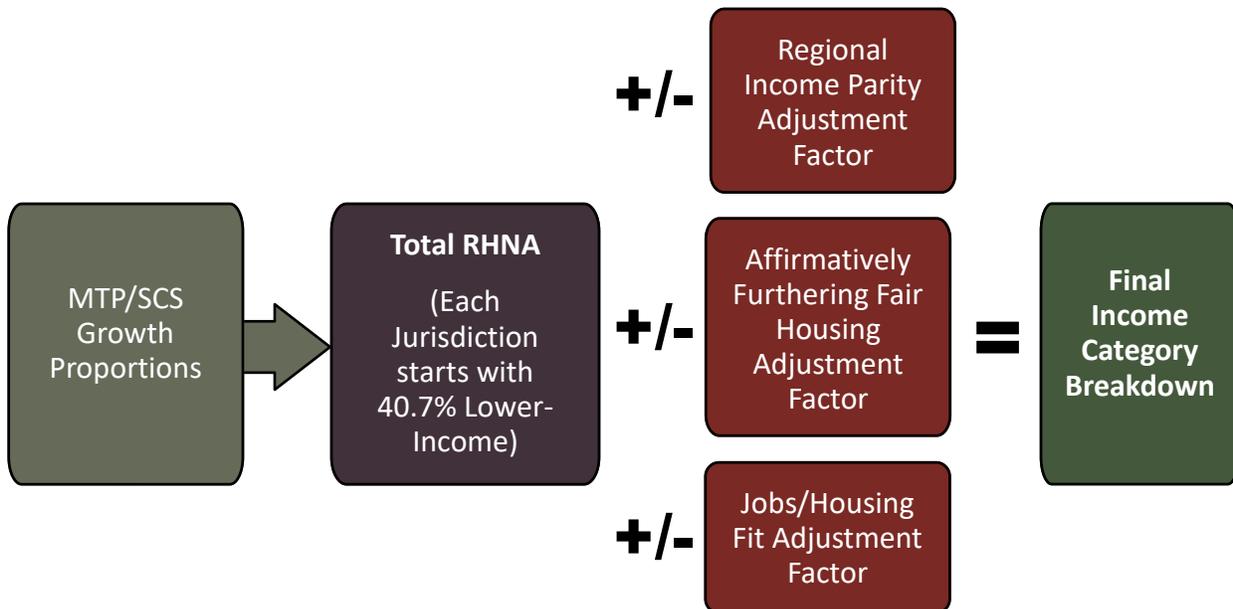
A key assumption of the RHNA requirements is that the higher the allowed density in the zoning, the more likely it is to be able to accommodate affordable housing. While above moderate-income RHNA can be accommodated on single family zoned sites, the lower income categories (very low- and low-income) can only be accommodated on sites zoned for higher densities (typically 20 or 30 units per acre). If a jurisdiction does not have enough zoning capacity to accommodate all income categories of its RHNA, it must identify sites and rezone them by 2024.

ADOPTED RHNA METHODOLOGY

On November 21, 2019, the SACOG Board adopted the Cycle 6 2021-2029 RHNA Methodology (Adopted RHNA Methodology). This methodology represents the culmination of input from the public, local housing planners, and housing stakeholders across the region over a 14-month period. The methodology is oriented around furthering the five RHNA objectives outlined in state law and discussed in Section 2. The Adopted RHNA Methodology uses a two-step process to:

- 1) Calculate each jurisdiction’s total RHNA based on their proportion of growth in SACOG’s adopted 2020 Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS)
- 2) Calculate the percentage of lower-income units in each jurisdiction based on three adjustment factors

This process is summarized in the graphic below and the resulting allocations are provided on the following page.



ADOPTED CYCLE 6 (2021-2029) RHNA METHODOLOGY SUMMARY TABLE

Jurisdiction	Lower Income Units				Higher Income Units		Total RHNA
	Very Low	Low	Very Low + Low	% of Total RHNA (VL+L)	Moderate	Above Moderate	
Placerville	56	34	90	34.7%	50	119	259
El Dorado County Uninc Tahoe Basin	91	55	146	40.7%	63	150	359
El Dorado County Unincorporated	1,350	813	2,163	43.3%	840	1,991	4,994
Auburn	68	41	109	35.2%	60	141	310
Colfax	17	11	28	28.9%	21	48	97
Lincoln	1,496	902	2,398	46.8%	807	1,915	5,120
Loomis	117	71	188	53.4%	49	115	352
Rocklin	1,911	1,151	3,062	54.1%	771	1,828	5,661
Roseville	3,855	2,323	6,178	51.2%	1,746	4,142	12,066
Placer County Uninc Tahoe Basin	110	67	177	40.7%	77	181	435
Placer County Unincorporated	2,017	1,215	3,232	43.6%	1,242	2,945	7,419
Citrus Heights	132	79	211	30.3%	144	342	697
Elk Grove	2,661	1,604	4,265	51.6%	1,186	2,812	8,263
Folsom	2,226	1,341	3,567	56.1%	829	1,967	6,363
Galt	404	243	647	33.6%	379	900	1,926
Isleton	5	3	8	28.6%	6	14	28
Rancho Cordova	2,115	1,274	3,389	37.4%	1,684	3,994	9,067
Sacramento	10,463	6,306	16,769	36.8%	8,545	20,266	45,580
Sacramento County Unincorporated	4,466	2,692	7,158	33.6%	4,186	9,928	21,272
Live Oak	73	44	117	28.4%	87	208	412
Yuba City	756	455	1,211	36.6%	622	1,475	3,308
Sutter County Unincorporated	177	107	284	39.0%	132	313	729
Davis	580	350	930	44.8%	340	805	2,075
West Sacramento	2,287	1,378	3,665	38.7%	1,722	4,084	9,471
Winters	125	75	200	36.2%	104	248	552
Woodland	663	399	1,062	34.4%	601	1,424	3,087
Yolo County Unincorporated	14	9	23	40.4%	10	24	57
Marysville	38	23	61	36.5%	31	75	167
Wheatland	105	64	169	33.9%	98	232	499
Yuba County Unincorporated	621	374	995	34.5%	561	1,331	2,887
Total	38,999	23,503	62,502	40.7%	26,993	64,017	153,512

RHNA KEY DATES

Year	Month	Key Dates
2019	January-March	SACOG surveyed member jurisdictions regarding the RHNA objectives and factors
	June	SACOG and HCD held a consultation process to ensure Regional Determination fairly reflected state law
	July	HCD issued SACOG its RHNA Determination (see Appendix A)
	September	SACOG issued Draft RHNA Methodology Menu (see Appendix D)
	October	The SACOG Board held a public hearing to solicit input from the public on the Draft RHNA Methodology Menu
	November	HCD provided SACOG a letter that confirmed the Draft RHNA Methodology Menu was consistent with the statutory requirements of RHNA law
	November	The SACOG Board adopted Option C as the Final RHNA Methodology
2020	January	The formal appeal deadline expires with no appeals
	March	SACOG Board adoption of the Final RHNA Plan

ORGANIZATION OF THIS PLAN

Section 1: Introduction to RHNA

This section provides an overview of the RHNA state law, the implications for local governments, and the process to develop the RHNA.

Section 2: RHNA Objectives and Factors

This section describes the statutory objectives/factors and how the Adopted RHNA Methodology furthers or considers them.

Section 3: Regional RHNA Determination

This section describes the process by which HCD developed and issued the RHNA Determination to SACOG.

Section 4: Adopted RHNA Methodology

This section describes, in detail, how the Adopted RHNA Methodology distributes the Regional Determination to each city and county in the SACOG region.

Section 5: Appendices

- The appendices include a variety of background documents including frequently asked questions, all letters received from HCD throughout the process, the full Draft RHNA Methodology Menu released for public review, comment letters and staff responses on said menu, and results from SACOG's affirmatively furthering fair housing survey.

SECTION 1: INTRODUCTION TO THE REGIONAL HOUSING NEEDS ALLOCATION CYCLE 6 (2021-2029)

CALIFORNIA STATE LAW AND RHNA

Since 1969, California has required that all local governments (cities and counties) adequately plan to meet the housing needs of everyone in the community. SACOG plays a significant role in how this is done through the Regional Housing Needs Allocation (RHNA) process for the six-county Sacramento region, comprised of the cities and counties within the counties of Placer, Sacramento, Sutter, Yolo and Yuba Counties, and the El Dorado County except for the city of South Lake Tahoe.

The California Housing and Community Development Department (HCD) issues a Regional Housing Needs Determination to SACOG's six-county region for the planning period of October 31, 2021 to October 31, 2029, which is the sixth cycle of RHNA. HCD determined that the region must zone for 153,512 housing units during this period. HCD calculates the regional determination using information provided by the California Department of Finance. The regional determination includes an overall housing need number, as well as a breakdown of the number of units required in four income distribution categories, as further defined below.

Based on the regional determination provided by HCD, the RHNA process breaks down the allocations for each of the cities and counties in the region, both overall number and by the four income categories. The allocations are formally adopted into this document, the Regional Housing Needs Plan (RHNP). The RHNA process, adopted through the RHNP, establishes the total number of housing units that each city and county must plan for within the eight-year planning period. Based on the adopted RHNA, each city and county must update its housing element to demonstrate how the jurisdiction will meet the expected growth in housing need over this eight-year planning period.

California Government Code Section 65584 et seq. encompasses the RHNA process.

IMPLICATIONS FOR CITIES AND COUNTIES

Once cities and counties received their allocations, each jurisdiction must then update the housing element of its general plan to demonstrate how zoning will accommodate the RHNA. General plans serve as the local government's "blueprint" for how a city or county will grow and develop and include seven elements: land use, transportation, conservation, noise, open space, safety, and housing. The law mandating that housing be included as an element of each jurisdiction's general plan is known as "housing-element law."

California's housing-element law acknowledges that, in order for the private market to adequately address the housing needs and demand of Californians, local governments must adopt plans and regulatory systems that provide opportunities for (and do not unduly constrain), housing development. As a result, housing policy in California rests largely upon the effective implementation of local general plans and, in particular, local housing elements.

SACOG'S ROLE IN RHNA

SACOG is required to develop and approve a RHNA and RHNP for its six-county region, including the counties of El Dorado, Placer, Sacramento, Sutter, Yolo, and Yuba, and their 22 cities. The RHNA and RHNP must also include the Tahoe Basin portions of El Dorado and Placer counties, which are not normally within SACOG's planning area, except for the city of South Lake Tahoe (the State of California will address the city directly).

SACOG's responsibility is to coordinate with HCD prior to its determination of the regional housing need. Once SACOG receives the regional determination, including the overall need number and the income category distribution, it must adopt a methodology for distributing the regional growth number throughout the region. The methodology is the basis for the final RHNA and RHNP that SACOG ultimately adopts.

ALLOCATIONS – OVERALL AND FOUR INCOME CATEGORIES

The Regional Housing Needs Allocation has two parts as required by State law:

1. Overall Allocation: SACOG received 153,512 total housing unit number for growth during the planning period in the six-county SACOG region (minus the city of South Lake Tahoe) from HCD. This overall number is broken down into four income categories.
2. Income Category Distributions: HCD also breaks up the total regional housing units into four income levels.
 - very low income (less than 50 percent median family income [MFI]);
 - low income (50 to 80 percent MFI);
 - moderate income (80 to 120 percent MFI);
 - moderate income (above 120 percent MFI).

Section 3 addresses how the State developed these allocations in the Regional Determination.

FOUR INCOME CATEGORIES

The four income categories listed above must be addressed in a jurisdiction's housing element. Specifically, accommodations must be made to ensure that the jurisdiction provides sufficient zoning capacity to accommodate the projected housing need in each income category.

It is important to note that each jurisdiction is responsible for providing sufficient zoning capacity for the units allocated to all four economic income categories but is NOT responsible for the construction of these units. The intent of the Housing Element Law is to ensure that jurisdictions do not impede the construction of housing in any income category. Other factors, such as market forces, are well beyond a jurisdiction's control and have considerable influence over whether housing units in each income category are actually constructed.

RELATIONSHIP TO SACOG’S TRANSPORTATION PLANNING

The SACOG 2020 Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS) plans for the projected growth in the region by 2040 and where it will take place. State law requires that the MTP/SCS be consistent with the RHNA. As such, the RHNA is an attempt to plan for the projected growth between 2021 and 2029 using the land use forecast and underlying data used in the MTP/SCS.

RHNA OBJECTIVES AND FACTORS

State law requires that five objectives be considered during the development of the methodology to allocate housing needs in the region:

- 1) Increase Housing Supply and Mix of Housing Types
- 2) Promote Infill, Equity, and Environment
- 3) Ensure Jobs Housing Balance and Fit
- 4) Promote Regional Income Parity
- 5) Affirmatively Further Fair Housing

The RHNA objectives provide the guiding framework for how SACOG must develop the methodology. SACOG is required to demonstrate how its methodology “furthers” each of the objectives. This requires proactive inclusion of each objective into the analysis and represents a higher standard than in previous cycles, which required allocations methodologies to be “consistent” with state objectives.

In addition, there are twelve RHNA factors (some with multiple parts) that SACOG must consider when distributing each jurisdiction’s overall and income category allocations. The RHNA factors must be “incorporated” into the methodology. State law mandates that each of the factors be included to the extent that sufficient data is available.

Section 2 of this document describes both the RHNA Objectives and the RHNA Factors and how they were furthered or considered.

METHODOLOGY: PROCESS FOR ALLOCATION

The RHNA methodology is the formula by which SACOG will allocate the number of housing units each city and county in the SACOG region must zone for between 2021 and 2029. The SACOG region must divide up the 153,512 dwelling units that was assigned by the California Housing and Community Development Department (HCD). The amount of lower income housing units that each jurisdiction must zone is of particular interest to local governments and stakeholders. The number of affordable, or lower income, units allocated to a jurisdiction is the amount that it must zone for higher densities. In the SACOG region, the default density standard for accommodating lower income RHNA units is either 20 or 30 units per acre, depending on the jurisdiction. Section 4 of this document describes the Adopted RHNA Methodology.

SECTION 2: RHNA OBJECTIVES AND FACTORS

RHNA OBJECTIVES AND RHNA FACTORS

Adopting the RHNA Methodology is the only step of the RHNA cycle for which SACOG has direct discretion. However, state statute requires SACOG to consider or further a series of objectives and factors, many of which have been amended by state legislation in 2018.

RHNA Objectives
<ul style="list-style-type: none">•The RHNA objectives provide the guiding framework for how regions must develop the RHNA methodology. SACOG is required to demonstrate how its methodology “furthers” each of the objectives. This language requires proactive inclusion of each objective into the analysis and is a higher legal bar than “consistency.”

RHNA Factors
<ul style="list-style-type: none">•The RHNA factors include a longer list of considerations that must be considered or incorporated into the methodology. Each of the factors should be included to the extent that sufficient data is available.

RHNA OBJECTIVES (§65584.D)

OBJECTIVE 1. INCREASE HOUSING SUPPLY AND MIX OF HOUSING TYPES

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

This objective is inherently addressed through a methodology that assigns units at different income categories to each jurisdiction across the region. The Adopted RHNA Methodology accomplishes this by ensuring each jurisdiction receives an allocation for lower income units. The three adjustment factors all support this objective by adjusting the percentage of lower income units as a means of accomplishing specific policy goals outlined in state statute.

In its review, HCD noted that the Adopted RHNA Methodology “allocates more lower income RHNA to jurisdictions that have higher housing costs. Six of the seven cities with the highest housing costs in the region also receive the seven largest shares of lower income RHNA. Additionally, there is fairly close alignment between the ranking of housing costs and share of lower income RHNA across all jurisdictions. This outcome helps to facilitate a mix of affordability, housing types, and tenure throughout the region.”

OBJECTIVE 2. PROMOTE INFILL, EQUITY, AND ENVIRONMENT

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

This objective shares many of the same goals as the MTP/SCS, which forms the basis for the total RHNA calculation for each jurisdiction. Among other things, the MTP/SCS forecasted development pattern promotes infill housing and supports a compact development pattern that will achieve the ambitious climate goals given to SACOG by the state. Since the MTP/SCS furthers these objectives and forms the basis for the total RHNA calculation, no additional adjustment factors are necessary to further this objective. More about how the MTP/SCS informs the RHNA is described below in the "Total RHNA Calculation" section. In addition, the jobs/housing fit adjustment factor supports this objective by working to create more affordable housing where there are high ratios of low-wage jobs to units that are affordable to low-wage workers. This will help to reduce the vehicle trip distances and increase the potential for non-auto commute options for lower income residents.

In its review, HCD noted that the Adopted RHNA Methodology "furthers the infill and environmental principles of this objective, as the overall allocation is based on SACOG's infill and job focused MTP combined with adjustment factors, such as the jobs-housing adjustment factor, which further direct lower income RHNA toward low-wage job centers, encouraging "jobs-housing fit," efficient development patterns, greater housing access for low-wage workers, and greenhouse gas reduction."

OBJECTIVE 3. ENSURE JOBS HOUSING BALANCE AND FIT

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

The MTP/SCS promotes an improved intraregional relationship between total jobs and total housing units as a means to achieving better climate and transportation outcomes. However, the MTP/SCS does not explicitly consider the relationship between low-wage jobs and the number of housing units affordable to low-wage workers in each jurisdiction. As such, the Adopted RHNA Methodology includes a jobs housing fit adjustment factor that seeks to house more low-wage workers near their jobs by encouraging jurisdictions with high ratios of low-wage workers to units affordable to low wage workers to zone for more affordable housing types.

In its review, HCD said that it "commends SACOG for including analysis of low-wage jobs and affordable units in the methodology. The jobs-housing fit adjustment factor directs more lower income RHNA to places with a higher overall number of low-wage jobs, and a higher number of low-wage jobs compared to units affordable to low-wage workers...Seven of the eight jurisdictions with the highest number of low-wage jobs also receive the eight highest shares of lower income RHNA for the region. There is also generally strong alignment between the rank of the jobs-housing ratio for a jurisdiction (more low-wage jobs to less affordable housing) and the share of lower income RHNA that a jurisdiction receives."

OBJECTIVE 4. PROMOTE REGIONAL INCOME PARITY

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

The MTP/SCS does not explicitly consider regional income parity. As such, the Adopted RHNA Methodology includes a regional income parity adjustment factor that seeks to move jurisdictions across the region towards a similar proportion of lower-income households over time by encouraging jurisdictions with low proportions of lower-income households to zone for more affordable housing types.

In its review, HCD noted that "This objective is furthered directly by the regional income parity adjustment factor. The SACOG adjustment provides an upward adjustment toward the regional average for jurisdictions that have a lower percentage of households in each income category compared to the region. While the adjustment explicitly responds to objective four, it also assists in the methodology furthering each of the other objectives."

OBJECTIVE 5. AFFIRMATIVELY FURTHER FAIR HOUSING

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

The MTP/SCS does not explicitly consider affirmatively furthering fair housing (AFFH). As such, the Adopted RHNA Methodology includes an affirmatively furthering fair housing adjustment factor that seeks to open high opportunity jurisdictions to all economic segments of the community by encouraging jurisdictions with large proportions of existing homes in high opportunity areas to zone for more affordable housing types.

In its review, HCD said that it "applauds the inclusion of the affirmatively furthering fair housing adjustment factor in the methodology. This factor directs more lower income RHNA to areas having more housing units in higher opportunity areas, as defined in the HCD/TCAC Opportunity Maps, which evaluate access to opportunity, racial segregation, and concentrated poverty on 11 dimensions, which are all evidence-based indicators related to long term life outcomes." In the Adopted RHNA Methodology HCD also noted that "the top seven jurisdictions with the most homes in High Opportunity areas receives the top seven largest shares of lower income RHNA thus encouraging more affordable homes in higher resourced areas and increasing housing access to these communities for lower income households." Legislation passed in 2018 requires SACOG to incorporate AFFH principles into the RHNA methodology. As such, the Draft RHNA Methodology Menu includes an AFFH adjustment factor that seeks to open up high opportunity areas, [as defined in the State Housing Opportunity Maps](#), to all economic segments of the community by encouraging jurisdictions with higher than average proportions of homes in high opportunity areas to zone for more affordable housing types.

AFFIRMATIVELY FURTHERING FAIR HOUSING SURVEY

In addition to furthering the above principles in the RHNA methodology, SACOG is required by state law to conduct a survey of fair housing issues, strategies, and actions. The intention is to help identify common barriers for opening up high opportunity areas and effective strategies for avoiding the displacement of lower income households. SACOG conducted this survey in Fall of 2019 and asked the following questions of all member agencies and received responses from 27 of the 28 jurisdictions:

- Does your General Plan have an environmental justice/social equity chapter or integrate environmental justice/social equity, per SB 1000?
- What steps has your jurisdiction undertaken to overcome historical patterns of segregation or remove barriers to equal housing opportunity?
- To what extent could the following factors be barriers to the production of more affordable housing types, including subsidized affordable, missing middle, or multifamily, in high opportunity areas? Options include zoning restrictions (density/intensity/height limits, parking requirements, minimum lot size), community opposition, construction costs, lack of market demand, infrastructure needs, or other.
- What steps has your jurisdiction undertaken to avoid, minimize, or mitigate the displacement of low income households?

The results of the survey are included in Appendix F and summarized below:

- Barriers to production of more affordable housing types in high opportunity areas:
 - 52% of jurisdictions identified zoning restrictions (density/intensity/height limits, parking requirements, minimum lot size) as potential barriers
 - 67% of jurisdictions identified community opposition as a barrier
 - 85% of jurisdictions identified construction costs/lack of funding as a barrier
 - 22% of jurisdictions (largely in rural areas) identified market demand as a barrier
 - 63% of jurisdictions identified infrastructure needs as a barrier
 - Other barriers that were identified by at least one jurisdiction include outside agency fees, a lack of dedicated funding for affordable housing, constrained land, prevailing wage requirements, labor shortages, lack of coordination between departments, and uncertainty associated with discretionary approval/litigation risk
- Only two jurisdictions currently have an environmental justice/social equity chapter in their general plan per SB 1000. Ten jurisdictions are in progress or plan to update in conjunction with their upcoming housing element update or general plan update.
- Jurisdictions across the region have taken a variety of steps to overcome historical patterns of segregation including promoting housing choice through small lot zoning, by right multifamily in high opportunity areas, decreased parking minimums, housing acquisition loans/down payment assistance, policies encouraging ADUs in single family areas, renter helplines, inclusionary zoning requirements, and just-cause eviction protections
- Many jurisdictions committed to including new programs in the 6th Cycle Housing Element Updates aimed at mitigating displacement and removing barriers to equal housing opportunity

RHNA FACTORS (§65584.04.E)

This section describes factors identified in state statute that SACOG must consider, to the extent sufficient data is available, when developing its RHNA methodology. SACOG gathered information relating to the RHNA factors in early 2019. SACOG staff traveled to each county in the region to meet with the planning staffs from each of the 22 cities and six counties in the region to collect data for both the MTP/SCS and the RHNA. SACOG staff also reviewed general plans, specific plans, and other planning documents for each jurisdiction. The following describes the factors and SACOG's approach to addressing them in the RHNA.

1. JOBS AND HOUSING RELATIONSHIP

"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." - §65584.04(e)

SACOG reviewed the jobs and housing balance of all jurisdictions. SACOG's MTP/SCS growth forecast, which forms the basis for the total RHNA calculation, considers areas where there are significant imbalances in jobs and housing today and the likelihood of those imbalances improving in the future given the recent market conditions and jurisdictions' local efforts to improve imbalances. Since this factor now includes consideration of existing and projected relationships between low-wage jobs and lower-income housing, the Adopted RHNA Methodology includes a jobs housing fit adjustment factor that seeks to house more low-wage workers near their jobs by encouraging jurisdictions with high ratios of low-wage workers to affordable housing units to zone for more affordable housing types.

2. Opportunities and constraints to development of additional housing (see below)

2a. Capacity for sewer and water service

"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." - §65584.04(e)

Some jurisdictions indicated that sewer and/or water capacity could be a constraint during the 2021-2029 RHNA cycle. The jurisdiction-level growth allocation in the MTP/SCS did consider sewer and water capacity constraints; however, the RHNA methodology developed by SACOG staff did not cap a jurisdiction's overall allocation because of diminishing sewer or water capacity (Gov. Code 65584.04(A)(2)). As long as a jurisdiction is able to plan for additional sewer and/or water capacity, no special adjustments were considered in the RHNA methodology. The only case where a jurisdiction is allowed an adjustment is where federal or state regulations prohibit a jurisdiction from providing necessary infrastructure for additional development. This only applies in the Tahoe Basin jurisdictions, which are excluded from this methodology for the reasons described in Section 4.

2b. Availability of land suitable for urban development

"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." - §65584.04(e)

The amount of land available for development varies by jurisdiction from relatively large to very limited amounts of vacant land, in addition to infill opportunities from underutilized properties. The MTP/SCS forecasts considered all jurisdictions' land supplies as it must be "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors." The MTP/SCS forecast also reflects jurisdiction-specific conditions like a lack of developable lands or redevelopment opportunities due to market forces.

Some jurisdictions noted land set aside for environmental mitigation. These mitigations are reflected in the MTP/SCS allocations in terms of timing of development in specific plan areas. However, jurisdictions that choose to set aside some land from development are not precluded from the planning for potential development in other lands within its boundaries. Jurisdictions are generally not subject to further reductions in their regional housing needs allocations based solely on their lack of developable lands.

2c. Lands preserved or protected from urban development

"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 non-agricultural uses." - §65584.04(e)

The two jurisdictions with land within the Tahoe Basin (Placer and El Dorado counties) are heavily regulated by federal and state laws. The SACOG methodology defers to the agency responsible for growth projections in this area – the Tahoe Regional Planning Agency (TRPA) – for growth allocations for the RHNA.

For the remaining 28 jurisdictions, lands must be officially designated as federal or state conservation lands before any adjustments to the RHNA methodology are considered. Even if federal designations are given, a jurisdiction still has the ability to plan for residential development on other lands within its boundaries. The RHNA will be adjusted only when it is determined no land is available for development within a jurisdiction. Jurisdictions that choose to impose local restrictions on developable lands are not exempt from the RHNA methodology. Jurisdictions with self-imposed restrictions may allow other lands for residential development, and as such, will be given an allocation according to the RHNA methodology.

2d. County policies to preserve prime agricultural land

"County policies to preserve prime agricultural land, as defined pursuant to Section 56064, within an unincorporated 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 non-agricultural uses." - §65584.04(e)

All six counties have policies that are intended to protect against the development of agricultural lands. The MTP/SCS forecast, which forms the basis of the total RHNA calculation, did not assume development in the areas where these policies are applicable.

3. Opportunities to maximize transit and existing transportation infrastructure

"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." - §65584.04(e)

As noted, the MTP/SCS land use pattern forms the basis for the total RHNA calculation. This land use pattern is developed in tandem with a series of transportation investments in an effort to ensure past and future transportation investments are maximized. The MTP/SCS calls for "development in communities where services, amenities, and transportation infrastructure already exist" (page 69). Since the MTP/SCS considers this factor no additional adjustment is necessary.

4. Policies directing growth toward incorporated areas

"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 non-agricultural uses." - §65584.04(e)

Some cities and their counties have agreements in place to direct growth towards incorporated areas. Where such agreements exist, SACOG directed growth away from unincorporated areas of the county as a part of the MTP/SCS land use forecast. Since the MTP/SCS considers this factor and forms the basis for the total RHNA calculation, no additional adjustment is necessary.

5. Loss of units contained in assisted housing developments

"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." - §65584.04(e)

During its meetings with individual jurisdictions, SACOG requested data on the potential loss of assisted units. "Assisted units" are multifamily rental housing units that receive governmental assistance under federal programs. Multiple programs and funding streams make it difficult for jurisdictions and other interest groups to compile accurate lists of the assisted properties in each jurisdiction, especially larger jurisdictions. As such, the conversion of low income units into non-low income units is not explicitly addressed through the distribution of housing need. HCD has made considerable effort to identify the number, location, and risk level of assisted housing units throughout the state. SACOG staff has

determined that at-risk units are best addressed through providing data on these units as part of SACOG’s preapproved data-package and giving local jurisdictions the discretion to address this factor and adequately plan for any at-risk unit loss in preparing their housing elements.

6. High housing cost burdens

"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."

SACOG staff worked with HCD as a part of the RHNA determination consultation process to compare the region’s housing cost burdens against comparable regions throughout the nation, including Austin, Denver, Miami, Phoenix, Portland, Salt Lake City, and San Antonio. As a part of this exercise, lower income and higher income cost burdens were separated using 2011-2015 U.S. Department of Housing and Urban Development (HUD), Comprehensive Housing Affordability Strategy (CHAS) data. The averages of these cost burdens by income group formed the basis for an adjustment as a part of the regional determination. The SACOG region is experiencing higher rates of cost burden in both categories than its peer regions, although not as severe as the Coastal California regions.

Region	Lower Income Cost Burden ³	Higher Income Cost Burden ³
USA Average	60.20%	11.17%

Austin-Round Rock, TX Metro Area*	66.56%	9.67%
Denver-Aurora-Lakewood, CO Metro Area*	63.78%	10.13%
Miami-Fort Lauderdale-West Palm Beach, FL Metro Area	71.13%	18.92%
Phoenix-Mesa-Scottsdale, AZ Metro Area*	63.46%	11.43%
Portland-Vancouver-Hillsboro, OR-WA Metro Area	67.08%	13.20%
Salt Lake City, UT Metro Area*	59.23%	8.79%
San Antonio-New Braunfels, TX Metro Area	58.34%	8.19%
<i>Average of Comparison Regions</i>	<i>64.23%</i>	<i>11.48%</i>

Sacramento--Roseville--Arden-Arcade, CA Metro Area*	68.89%	16.29%
Yuba City, CA Metro Area	66.99%	17.54%
SACOG Region	68.80%	16.40%

As demonstrated in the table above, housing cost burden disproportionately impacts lower income households in comparison to higher income households. This issue is exacerbated in areas where there is not enough affordable housing available, particularly in higher income areas. The Adopted RHNA Methodology incorporates the regional income parity and affirmatively furthering fair housing adjustment factors as a means of planning for more affordable housing types in higher income, higher opportunity areas of the region. Increasing affordable housing supply in these areas can help alleviate cost-burden experienced by local lower-income households because more affordable options will be available. The Adopted RHNA Methodology does not apply a jurisdiction-level adjustment factor for cost burden, but the above adjustment factors are sufficient to address this factor. In addition, SACOG staff has provided jurisdiction-specific rates of cost burden as part of SACOG’s preapproved data-package, which will give local jurisdictions the discretion to further address this factor in their housing elements.

7. Rate of Overcrowding

SACOG staff worked with HCD as a part of the RHNA determination consultation process to compare the region's rates of overcrowding against comparable regions throughout the nation, including Austin, Denver, Miami, Phoenix, Portland, Salt Lake City, and San Antonio. The averages of these overcrowding rates, based on 2013-2017 5-yr Census ACS data, formed the basis for an adjustment as a part of the regional determination. The SACOG region is experiencing higher rates of overcrowding than its peer regions, although not as severe as the Coastal and Southern California regions.

Region	Overcrowding Rate
<i>USA Average</i>	3.34%

Austin-Round Rock, TX Metro Area*	3.95%
Denver-Aurora-Lakewood, CO Metro Area*	2.83%
Miami-Fort Lauderdale-West Palm Beach, FL Metro Area	4.64%
Phoenix-Mesa-Scottsdale, AZ Metro Area*	4.40%
Portland-Vancouver-Hillsboro, OR-WA Metro Area	3.14%
Salt Lake City, UT Metro Area*	3.43%
San Antonio-New Braunfels, TX Metro Area	4.14%
<i>Average of Comparison Regions</i>	3.79%

Sacramento--Roseville--Arden-Arcade, CA Metro Area*	4.21%
Yuba City, CA Metro Area	6.87%
SACOG Region	4.40%

Overcrowding is defined as more than 1.01 persons per room (not bedroom) in a housing unit. Similar to cost-burden, overcrowding is caused by an accumulated housing supply deficit and is considered an indicator of existing housing need. The As such, SACOG staff has determined that jurisdiction-specific rates of overcrowding are best addressed through providing data as part of SACOG's preapproved data-package and giving local jurisdictions the discretion to address this factor in preparing their housing elements.

8. Housing needs of farmworkers

The need for farmworker housing in the SACOG region is a greater issue for farming operations in the valley than in the foothills due to the types of crops and amount of production in these areas. Housing authorities in the region provide some publicly owned and/or dedicated farm laborer housing. Some of these units provide seasonal housing and others permanent housing. Farm labor camps are permitted by use permit in all of the region's counties. In addition, recent state legislation (AB 1763: Farmworker Housing Act) streamlines and provides incentives for the construction of new worker units on surplus farmland, provided they are managed by a non-profit third party. Using this new process, land zoned for agriculture can be developed as farmworker housing so long as it meets standard environmental and safety guidelines and is deed-restricted for lower income agricultural workers for at least 55 years.

Each county has policies encouraging some farm laborer housing on-site (via an accessory unit) and all of the agricultural zoning codes in the region allow for an accessory dwelling unit on-site, either by right or with an additional permit. The number of accessory dwelling units that currently exist in the region and the percentage of these used for farm laborer housing is unknown. Through their housing elements, all of the counties have policies that encourage the use of state and federal housing aid programs to provide farm laborer housing. These policies and practices are reflected in the MTP/SCS.

The Adopted RHNA Methodology does not apply a jurisdiction-level adjustment factor directly related to the housing needs of farmworkers. In many ways, directing growth toward incorporated areas protects the livelihood of farmworkers by preserving prime farmland. Assigning jurisdictions with higher numbers of farmworkers could result in the jurisdiction being forced to rezone agricultural land to housing uses as a means of accommodating its RHNA. This does not serve the interests of farmworkers. As such, SACOG staff has determined that the needs of farmworkers are best addressed through providing data as part of SACOG's preapproved data-package and giving local jurisdictions the discretion to address this factor in preparing their housing elements.

9. Housing needs of UC and Cal State students

"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." - §65584.04(e)

The plans made by Sacramento State University and University of California Davis campuses are considered as a part of the MTP/SCS land use forecast and are thereby incorporated into the methodology. SACOG staff held a meeting with representatives of UC Davis, City of Davis, Yolo County, and Department of Finance to discuss the housing needs of UC Davis students and how it relates to the MTP/SCS and RHNA methodologies. UC Davis generates a tremendous amount of market demand in the City of Davis, leading to a historically low vacancy rate and an increasing number of student-oriented projects. Market demand is one of the factors that SACOG considers as a part of the MTP/SCS land use forecast. UC Davis is also a growing jobs center, and proximity to jobs as well as jobs/housing balance are also considered in the MTP/SCS. In addition, the MTP/SCS is required to hit a GHG reduction target from the state. One of the key ways the MTP/SCS achieves this target is by continuing to forecast the existing trend of new housing being built close to jobs, which reduces trip distance and facilitates alternative modes of transportation. In this way, the MTP/SCS forecasts more housing near both UC Davis and Sacramento State University.

10. Loss of units during an emergency

"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." - §65584.04(e)

There were four states of emergency that were declared by the Governor during the 2013-2021 RHNA period in the SACOG region.

- Governor Newsom declared a State of Emergency in counties across California due to winter storms on 2/21/2019, including El Dorado and Yolo Counties. No homes were destroyed as a part of this emergency in the SACOG region.

- Governor Brown declared a State of Emergency in three counties on 10/9/17, including Yuba County during the Tubbs, Atlas, and Cascade fires. Approximately 142 residential buildings in Yuba County were destroyed as a part of this series of fires.
- Governor Brown declared a state of emergency in multiple counties, including Sutter and Yuba County, on 2/12/17 due to the potential for extreme flooding from the Oroville spillway failure. The flooding did not occur, and no homes were destroyed as a part of this emergency in the SACOG region.
- Governor Brown declared a State of Emergency in El Dorado County on 9/17/14 due to the effects of the King and Boles fires. Approximately 12 residential buildings in El Dorado County were destroyed in the King fire.

As a part of the Regional Determination, HCD applies a minimum replacement unit adjustment of 0.5 percent, which is intended to make up for the typical rate of housing demolitions and/or units lost. SACOG has fortunately experienced a low 0.2 percent demolition rate over the past 10 years, which falls significantly below the minimum replacement rate. HCD applied the 0.5 percent minimum, which resulted in 5,105 additional RHNA units for the region. In this way, the regional determination included significantly more units than those lost, including average demolitions and the approximately 154 units lost due to a state of emergency. As such, an extra mechanism to distribute RHNA based on this factor is not necessary to meet the loss of units.

11. SB 375 Greenhouse Gas Reduction Targets

"The region's greenhouse gas emissions targets provided by the State Air Resources Board pursuant to Section 65080." - §65584.04(e)

Passenger vehicles account for roughly 30 percent of greenhouse gas emissions in California. Under Senate Bill 375 (SB 375), Metropolitan Planning Organizations (MPOs) like SACOG are responsible for conducting land use and transportation planning in a way that reduces greenhouse gases from cars and light duty trucks. Under SB 375, the California Air Resources Board (CARB) is responsible for issuing greenhouse gas targets to MPOs that aim to reduce vehicle emissions, consistent with state climate goals, by 2035 as compared to a 2005 baseline. For the 2020 MTP/SCS, CARB assigned SACOG a target of 19 percent per capita greenhouse gas (GHG) reduction.

The MTP/SCS employs a variety of measures to reach this ambitious target. The primary reductions come from an increase in the share of alternative modes to the single occupancy vehicle (like transit, biking, and walking) and shortened vehicle trips. These two measures, which result from a more compact land use pattern and investments in transit and active transportation, make up over half of the GHG reductions. The remaining reductions come from road facility pricing strategies, local electric vehicle programs, and exogenous factors like an aging population and increased auto costs. The assumptions and indicators described in Appendix E the MTP/SCS offer the best path to achieving the 19 percent per capita (GHG) emissions reduction target, which is subject to review of CARB.

The MTP/SCS land use forecast, which is designed to reach the GHG reduction target, forms the basis for the total RHNA calculation in the Adopted RHNA Methodology. As noted in Section 4, the Regional Determination is multiplied by the proportion of regional growth attributed to a jurisdiction in the growth forecast for the MTP/SCS between 2016-2035, which is the same time horizon as the GHG reduction target. This ensures that the RHNA methodology is both furthering the Infill, Equity, and Environment objective as well as incorporating this RHNA factor that explicitly references the GHG reduction target from CARB.

12. Other factors adopted by Council of Governments

"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." - §65584.04(e)

No other planning factors were adopted by SACOG to review as a specific local planning factor. Flood protection and management may affect the RHNA methodology and the associated allocations. The Federal Emergency Management Agency (FEMA) is reviewing the flood levees and may re-designate and impose a federal moratorium on residential development in certain areas. If, during the RHNA update process, a jurisdiction receives a FEMA designation that prohibits near-term development, the RHNA methodology may need to be revised.

SECTION 3: REGIONAL RHNA DETERMINATION

The Final SACOG Regional Determination for Cycle 6 of RHNA (2021-2029) is 153,512 units. The Determination began with a consultation between HCD and SACOG staff to discuss HCD's approach, data sources, and timeline. Through this consultation, SACOG staff worked with HCD staff to provide region-specific suggestions for applying state law fairly and appropriately. Based on that consultation, HCD issued a Regional Determination of 153,512 units to SACOG on July 18, 2019, which includes adjustments for vacancy, replacement, overcrowding, and cost burden per state law. As of August 17, 2019, 30 days after receipt by SACOG, the determination became final.

HCD develops the Regional Determination using a two-step process beginning with a regional projection of new households which is then adjusted up or down using a required set of existing needs factors. The regional projection of new households is developed in consultation with the California Department of Finance. It starts with the projected household population for the end of the RHNA period (August 31, 2029 for Cycle 6). The projected population used by HCD as a part of the Cycle 6 Regional Determination is in line with what SACOG is projecting in the MTP/SCS. Based on this household population projection, HCD uses household formation rates by age group to estimate the number of new projected households the region needs to accommodate. The household growth projection for the SACOG region for Cycle 6 is 112,609 and makes up the largest component of the overall determination.

Starting with the projected household growth number above, HCD adjusts the Regional Determination to account for four existing needs factors: (1) vacancy rate, (2) replacement units, (3) overcrowding, and (4) cost burden. The state's purpose for including these factors is to capture existing housing need irrespective of future household growth. HCD is required by state law to factor these needs into the Regional Determination. The Regional Determination calculates the four existing needs adjustments in the following ways:

1. **Vacancy Rate:** HCD compares the SACOG region's existing vacancy rate with a healthy vacancy rate of 5%. The difference is then multiplied with the total projected households to yield the vacancy adjustment. For Cycle 6 of RHNA, the SACOG region's vacancy rate is low (2.77%), which means that SACOG received a 2.23% upward adjustment in the Regional Determination. This resulted in 22,730 additional units.
2. **Replacement Units:** HCD applies a replacement adjustment between 0.5% and 5% based on the current 10-year annual average percent of demolitions. Since the SACOG region has a very low rate of demolitions (0.18%), SACOG received the minimum (0.5%) replacement adjustment. This resulted in 5,105 additional units.
3. **Overcrowding:** The overcrowding adjustment was added in 2018 by state legislation. For the purposes of RHNA, overcrowding is defined as more than one resident per room in each room in a dwelling. This adjustment is based on the difference between the rate of overcrowding in the SACOG region and the rate of overcrowding in comparable regions, which SACOG staff worked with HCD to identify. The difference between the overcrowding rate in the SACOG region (4.39%) and comparable regions (3.79%) is 0.6%. This difference resulted in 6,111 additional units.
4. **Cost Burden:** The cost burden adjustment was added in 2018 by state legislation. For the purposes of RHNA, cost burden is defined as the percentage of households paying more than

30% of their income on housing. Since cost burden is experienced very differently across income groups, the rate of cost burden is separated between households earning below 80% of area median income (lower income) and households earning above 80% area median income (higher income). The adjustment is based on the difference between cost burden by income group for the region and the cost-burden by income group in comparable regions, which SACOG staff worked with HCD to identify. The difference between the cost burden rate for lower income households in the SACOG region (68.76%) and comparable regions (64.23%) is 4.53%. This difference resulted in 2,711 additional lower income units. The difference between the cost burden rate for higher income households in the SACOG region (16.37%) and comparable regions (11.48%) is 4.89%. This difference resulted in 4,246 additional higher income units.

In total, SACOG received a Regional Determination of 153,512 units for Cycle 6 of RHNA, of which 40,903 is due to the existing needs factors described in the bullets above. The determination is approximately 46 percent higher than the Cycle 5 (2013-2021) determination of 104,970. The increase in the regional determination this cycle is not unique to the SACOG region and reflects both the drastically different housing climate in 2019 as well as the addition of two new existing need considerations (overcrowding and cost burden). The different housing climate in 2019 and its impact on the regional determination is most evident in the vacancy rate adjustment. Vacancy rates lower than 5 percent typically indicate that housing supply is not keeping pace with demand. HCD has historically adjusted the determination upward in situations like this. Last cycle, in the depths of the recession, SACOG received a special downward RHNA adjustment to “account for abnormally high vacancies and unique market conditions due to prolonged recessionary conditions, high unemployment, and unprecedented foreclosures.” As such, the Cycle 5 determination was reduced by approximately 12,640 units as HCD assumed some housing demand would be addressed through absorption into vacant housing units. For Cycle 6, SACOG received an upward adjustment of 22,730 units in order to bring the SACOG region’s vacancy rate back to a healthy vacancy rate of 5 percent. This means that changes in vacancy rate alone are resulting in a net increase of over 35,000 units relative to last RHNA cycle.

TAHOE BASIN

The Regional Determination of 153,512 units from HCD includes all 28 jurisdictions within the SACOG Planning Area, as well as the Tahoe Basin portions of unincorporated Placer and El Dorado Counties. Jurisdictions within the Tahoe Basin are subject to the Bi-State Compact (Public Law 96-551) and the [Lake Tahoe Regional Plan](#), which limits growth in the Basin. The Tahoe Regional Planning Agency (TRPA) provided SACOG with a memo on 7/31/19 (Appendix A) that included growth assumptions for the Tahoe Basin portions of unincorporated Placer and El Dorado Counties (included at end of this document). SACOG will not be covering the city of South Lake Tahoe in this RHNA cycle, as determined by HCD.

The Total RHNA calculation shown below accepts the recommendations from TRPA, which removes 794 units (359 from El Dorado County and 435 from Placer County) from the 153,512 Regional Determination that is distributed based on the proportion of 2016-2035 MTP/SCS growth.

HCD Determination	153,512
Unincorporated El Dorado County in Tahoe Basin	359
Unincorporated Placer County in Tahoe Basin	435
SACOG Planning Area RHNA	152,718

SECTION 4: ADOPTED RHNA METHODOLOGY

LOCAL PLANNER AND STAKEHOLDER INPUT

The Adopted RHNA Methodology represents the culmination of input from the public, local housing planners, and housing stakeholders across the region. Over the course of 14 months, SACOG worked with stakeholders a number of ways, including:

- Seven regionwide local government housing planner meetings (July 2018 – August 2019)
- Four Regional Planning Partnership (RPP)¹ meetings (February, April, June, and August - 2019);
- RHNA factors meetings with local planners in each of the six counties, plus special meetings with UC Davis and Tahoe Regional Planning Agency
- Four regional manager/director meetings (November 2018, March, May, and August 2019)
- Ten presentations for local government planning commissions and city council meetings (2019)

These meetings provided an opportunity for SACOG to discuss and solicit feedback on the types of data that could be used to further the RHNA objectives, the assumptions that should be made, as well as information regarding conditions in individual jurisdictions that should be taken into consideration.

METHODOLOGY OVERVIEW

Given the requirement to proactively “further” the five objectives in the methodology, much of the Adopted RHNA Methodology is oriented around the five statutory RHNA objectives. It does this either through the total RHNA calculation or through three adjustment factors. The table below demonstrates how the different aspects of the Adopted RHNA Methodology either further or support the five RHNA objectives. These aspects and how they affect the distribution of RHNA across the region are discussed in more detail below. HCD provided a letter confirming that the Adopted RHNA Methodology indeed furthers the five statutory objectives (see Appendix C).

Objective	Total RHNA Calculation based on MTP/SCS	Methodology Adjustment Factors		
		Regional Income Parity	Affirmatively Furthering Fair Housing	Jobs/Housing Fit
Increase Housing Supply and Mix of Housing Types	Furthers	Supports	Supports	Supports
Promote Infill, Equity, and Environment	Furthers			Supports
Ensure Jobs Housing Balance and Fit	Supports			Furthers
Promote Regional Income Parity		Furthers	Supports	
Affirmatively Further Fair Housing		Supports	Furthers	

¹ A committee with close to 100 representatives from local, regional, state, federal agencies, and tribal governments, as well as representatives of business, environmental, and minority organizations and associations. The Partnership meets monthly and serves as the primary forum for interagency and public consultation.

TOTAL RHNA CALCULATION

The first step in any RHNA methodology is to determine each jurisdiction's total RHNA before it is further split into four income categories. The Adopted RHNA Methodology determines each jurisdiction's total RHNA number by multiplying the Regional Determination by the proportion of regional growth attributed to a jurisdiction in the growth forecast for the Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS) between 2016 and 2035. For example, if a jurisdiction's MTP/SCS 2016-2035 growth represented 10% of the region and the region's RHNA Determination was 100 units, this jurisdiction would be allocated 10 total units. While the 2020 MTP/SCS plans for growth out to 2040, the Sustainable Communities and Climate Protection Act of 2008 (Senate Bill 375) links the RHNA to the region's greenhouse gas reduction goals which have a target year of 2035.

The total RHNA calculation is based on the MTP/SCS for two primary reasons.

- 1) State statute requires that housing units allocated through RHNA be "consistent with the development pattern included in the sustainable communities strategy." By using the MTP/SCS growth forecast as the basis for total RHNA calculations, SACOG ensures consistency across these two planning efforts.
- 2) The MTP/SCS land use forecast is an ambitious, but achievable development pattern built from local plans that considers a variety of regulatory, market, and performance factors. The growth forecast in the MTP/SCS has been thoroughly vetted by local planning staff and represents a regional compromise around how the region will grow and meet its climate and quality of life goals.

Total RHNA Calculation			
Jurisdiction	2016-2035 MTP Growth¹	% of Regional Growth²	Total RHNA³
Placerville	374	0.17%	259
El Dorado County Unincorporated Tahoe Basin			359
El Dorado County Unincorporated	7,226	3.27%	4,994
Auburn	449	0.20%	310
Colfax	141	0.06%	97
Lincoln	7,407	3.35%	5,120
Loomis	510	0.23%	352
Rocklin	8,190	3.71%	5,661
Roseville	17,456	7.90%	12,066
Placer County Unincorporated Tahoe Basin			435
Placer County Unincorporated	10,733	4.86%	7,419
Citrus Heights	1,008	0.46%	697
Elk Grove	11,955	5.41%	8,263
Folsom	9,205	4.17%	6,363
Galt	2,786	1.26%	1,926
Isleton	40	0.02%	28
Rancho Cordova	13,118	5.94%	9,067
Sacramento	65,945	29.85%	45,580
Sacramento County Unincorporated	30,776	13.93%	21,272
Live Oak	596	0.27%	412
Yuba City	4,786	2.17%	3,308
Sutter County Unincorporated	1,054	0.48%	729
Davis	3,001	1.36%	2,075
West Sacramento	13,702	6.20%	9,471
Winters	799	0.36%	552
Woodland	4,466	2.02%	3,087
Yolo County Unincorporated	83	0.04%	57
Marysville	242	0.11%	167
Wheatland	722	0.33%	499
Yuba County Unincorporated	4,177	1.89%	2,887
Total	220,950		153,512

1) Taken from the 2016-2035 MTP/SCS Draft preferred Scenario Land Use Assumptions. These assumptions do not reflect any of the group quarters growth on the UC Davis Campus in Unincorporated Yolo County because group quarters are not included in the RHNA process and Yolo County does not have land use authority on UC property.

2) Reflects the percent of the 220,950 MTP/SCS growth each jurisdiction represents.

3) Reflects the percent of regional MTP/SCS growth multiplied by the SACOG Planning Area Determination of 152,718.

As noted in the Total RHNA Calculation table footnotes above, the 2016-2035 MTP/SCS growth proportions, which form the basis for the total RHNA calculation, do not include housing growth on the UC Davis Campus in Unincorporated Yolo County. The RHNA Determination from HCD does not include housing need from student housing, which is considered to be group quarters. Additionally, Yolo County does not have land use authority on UC property and, thus, would have no discretion to make zoning changes associated with housing need on the UC Davis campus. Because UC Davis and other large institutions do not receive a separate RHNA number, RHNA is not an appropriate mechanism to plan for housing on UC Davis property.

Unrelated to the RHNA process, UC Davis completed and adopted in July 2018 a new housing plan as part of the UC Davis 2018 Long Range Development Plan (LRDP). The UC Davis 2018 LRDP is the governing land use and growth plan for the UC Davis campus and includes significant planning capacity for housing growth to exceed the projected enrollment growth. UC Davis has initial housing projects that are currently committed to provide housing for more than 6,100 students by 2025 and a guarantee to build on-campus housing for 100 percent of any new students in both on-campus residence halls and apartment projects.

ADJUSTMENT FACTORS OVERVIEW

The framework for the Adopted RHNA Methodology is oriented around furthering each of the RHNA objectives described in Section 2. As such, each of the objectives is addressed individually. As discussed, the first two objectives are either intrinsically addressed through a methodology that assigns units at different income categories to each jurisdiction across the region or furthered through the total RHNA calculation by relying on the development pattern in the MTP/SCS.

The other three objectives are, at least in part, not inherently furthered by the MTP/SCS. Therefore, the Adopted RHNA Methodology employs three separate adjustment factors that further each of these objectives. Since the total RHNA calculation is determined by the MTP/SCS growth proportion, these adjustment factors instead adjust the number of lower-income units assigned to each jurisdiction. As a result of these adjustments, each jurisdiction will receive a different proportion of lower-income units. The adjustment factors are summarized in the table below and then detailed on the following three pages. Each adjustment factor yields an “unweighted variance,” which is then weighted and capped. A full discussion of the weighting and caps are included at the end of this section.

	Adjustment Factors Summary		
	#1. Regional Income Parity	#2. Affirmatively Furthering Fair Housing	#3. Jobs/Housing Fit
Intent	Move jurisdictions across the region towards a similar proportion of lower-income households over time by encouraging jurisdictions with low proportions of lower-income households to zone for more affordable housing types.	Open up high opportunity jurisdictions to all economic segments of the community by encouraging jurisdictions with large proportions of existing homes in high opportunity areas to zone for more affordable housing types.	House more low-wage workers near their jobs by encouraging jurisdictions with high ratios of low-wage workers to affordable housing units to zone for more affordable housing types.
Adjustment Mechanism	<p>Jurisdictions with a lower than average proportion of lower income households receive an upward adjustment of lower income RHNA units.</p> <p>Jurisdictions with a higher than average proportion of lower income households receive a downward adjustment of lower income RHNA units.</p>	<p>Jurisdictions with a higher than average proportion of existing units in high opportunity areas receive an upward adjustment of lower income RHNA units.</p> <p>Jurisdictions with a lower proportion of existing units in high opportunity areas receive a downward adjustment of lower income RHNA units.</p>	<p>Jurisdictions with a higher than average ratio of low-wage workers to units affordable to low-wage workers receive an upward adjustment of lower income RHNA units.</p> <p>Jurisdictions with a lower than average ratio of low-wage workers to units affordable to low-wage workers receive a downward adjustment of lower income RHNA units.</p>
Underlying Data (relative to regional average)	Based on the existing proportion of lower-income households from the 2015 Comprehensive Housing Affordability Strategy (CHAS) data released by the US Department of Housing and Urban Development (HUD).	Based on the proportion of 2016 housing units that fall within high opportunity areas. High opportunity areas are adapted from Opportunity Area Maps created by TCAC/HCD and vetted by the CA Fair Housing Task Force.	Based on the ratio of low-wage workers (<\$2,300/month) to units affordable to low-wage workers (<\$1,000/month). These figures were adapted from Census Public Use Microdata Sample (PUMS) and American Community Survey (ACS) data.

REGIONAL INCOME PARITY ADJUSTMENT FACTOR

Jurisdiction	A: Existing Lower Income Households	B: Regional Parity Target	C: 2029 Trendline Intersection	D: Unweighted Variance
Placerville	56%	42.5%	48%	-7.5%
El Dorado County Unincorporated	32%	42.5%	38%	6.1%
Auburn	45%	42.5%	44%	-1.5%
Colfax	51%	42.5%	46%	-4.7%
Lincoln	33%	42.5%	38%	5.4%
Loomis	34%	42.5%	39%	4.8%
Rocklin	32%	42.5%	38%	6.1%
Roseville	32%	42.5%	38%	5.9%
Placer County Unincorporated	34%	42.5%	39%	5.0%
Citrus Heights	50%	42.5%	46%	-4.2%
Elk Grove	30%	42.5%	37%	7.3%
Folsom	22%	42.5%	34%	11.8%
Galt	42%	42.5%	42%	0.0%
Isleton	62%	42.5%	51%	-10.9%
Rancho Cordova	48%	42.5%	45%	-3.0%
Sacramento	50%	42.5%	46%	-4.1%
Sacramento County Unincorporated	48%	42.5%	45%	-3.1%
Live Oak	54%	42.5%	48%	-6.8%
Yuba City	41%	42.5%	42%	1.1%
Sutter County Unincorporated	31%	42.5%	38%	6.5%
Davis	46%	42.5%	44%	-1.9%
West Sacramento	50%	42.5%	46%	-4.5%
Winters	43%	42.5%	43%	-0.4%
Woodland	47%	42.5%	45%	-2.8%
Yolo County Unincorporated	49%	42.5%	45%	-4.0%
Marysville	50%	42.5%	46%	-4.5%
Wheatland	32%	42.5%	38%	5.8%
Yuba County Unincorporated	42%	42.5%	42%	0.3%
Total	42.5%			

A: This column reflects each jurisdiction’s existing proportion of lower-income households as estimated in the most recent (2015) Comprehensive Housing Affordability Strategy (CHAS) data set.

B: The regional parity target is the region’s existing proportion of lower-income households as estimated in the most recent (2015) Comprehensive Housing Affordability Strategy (CHAS) data set.

C: Based on a trendline between each jurisdiction’s existing proportion of lower-income households (Column A) and a regional parity target (Column B) in 2035, this column shows the 2029 trendline intersection for each jurisdiction. Using the 2029 trendline intersection, which is the end of the Cycle 6 RHNA period, provides a glide path for jurisdictions to be trending towards regional income parity.

D: Unweighted variance is calculated by taking the difference between the 2029 trendline intersection (Column C) and the jurisdiction’s existing proportion of lower income households (Column A).

AFFIRMATIVELY FURTHERING FAIR HOUSING ADJUSTMENT FACTOR

Jurisdiction	A: High Opportunity Units	B: High Opportunity Average	C: Unweighted Variance
Placerville	0%	37%	-37.0%
El Dorado County Unincorporated	39%	37%	2.4%
Auburn	0%	37%	-37.0%
Colfax	0%	37%	-37.0%
Lincoln	70%	37%	33.1%
Loomis	100%	37%	63.0%
Rocklin	100%	37%	63.0%
Roseville	69%	37%	32.3%
Placer County Unincorporated	34%	37%	-3.5%
Citrus Heights	0%	37%	-37.0%
Elk Grove	72%	37%	34.9%
Folsom	100%	37%	63.0%
Galt	4%	37%	-33.2%
Isleton	0%	37%	-37.0%
Rancho Cordova	9%	37%	-28.2%
Sacramento	31%	37%	-6.3%
Sacramento County Unincorporated	18%	37%	-19.3%
Live Oak	0%	37%	-37.0%
Yuba City	30%	37%	-7.3%
Sutter County Unincorporated	34%	37%	-2.7%
Davis	90%	37%	52.8%
West Sacramento	42%	37%	4.7%
Winters	0%	37%	-37.0%
Woodland	12%	37%	-24.8%
Yolo County Unincorporated	26%	37%	-11.0%
Marysville	60%	37%	22.5%
Wheatland	0%	37%	-37.0%
Yuba County Unincorporated	29%	37%	-7.9%
Total	37%		

A: This column shows the percentage of each jurisdiction’s existing units (as inventoried in the MTP 2016 baseyear) that are located within high opportunity areas. In this option, high opportunity areas are defined as high or highest resource census tracts in the Tax Credit Allocation Committee/Housing and Community Development (TCAC/HCD) Opportunity Area Maps. These are areas that have high index scores for a variety of educational, environmental, and economic indicators. To avoid identifying sparsely populated census tracts that have limited access to services as high opportunity, tracts with a population density threshold of 250 people per square mile or less were excluded. The maps and underlying methodology can be found here: <https://www.treasurer.ca.gov/ctcac/opportunity.asp>

B: The regional average shows the percentage of the region’s existing units (as inventoried in the MTP 2016 baseyear) that are located within high opportunity areas, as defined above in Column A.

C: Unweighted variance is calculated by taking the difference between Column A and the regional average in Column B.

JOBS HOUSING FIT ADJUSTMENT FACTOR

Jurisdiction	A: Jobs less than \$2,300/mo	B: Units less than \$1,000/month	C: Jobs Housing Fit Ratio	D: Unweighted Variance
Placerville	3,468	1,276	2.7	50%
El Dorado County Unincorporated	12,288	4,689	2.6	40%
Auburn	3,358	1,503	2.2	0%
Colfax	304	318	1.0	-120%
Lincoln	2,952	1,060	2.8	60%
Loomis	1,168	263	4.4	220%
Rocklin	8,358	1,896	4.4	220%
Roseville	29,210	5,510	5.3	310%
Placer County Unincorporated	10,731	3,637	3.0	80%
Citrus Heights	7,166	9,004	0.8	-140%
Elk Grove	14,561	3,551	4.1	190%
Folsom	15,702	1,636	9.6	740%
Galt	1,687	1,272	1.3	-90%
Isleton	66	121	0.5	-170%
Rancho Cordova	19,382	7,066	2.7	50%
Sacramento	102,034	53,579	1.9	-30%
Sacramento County Unincorporated	67,480	57,259	1.2	-100%
Live Oak	308	677	0.5	-170%
Yuba City	9,347	7,350	1.3	-90%
Sutter County Unincorporated	2,088	1,665	1.3	-90%
Davis	7,798	3,399	2.3	10%
West Sacramento	10,928	5,063	2.2	0%
Winters	720	316	2.3	10%
Woodland	8,781	5,389	1.6	-60%
Yolo County Unincorporated	7,039	1,655	4.3	210%
Marysville	2,647	2,514	1.1	-110%
Wheatland	264	297	0.9	-130%
Yuba County Unincorporated	3,888	5,262	0.7	-150%
Total				

A: Jobs with wages less than \$2,300/month are calculated using Census Place of Work Public Use Microdata Sample (POW PUMS) data from the 6-county SACOG region to estimate the percentage of generalized Standard Occupational Classifications (SOCs) whose monthly wages are below \$2,300 in 2017 inflation adjusted dollars. These SOCs are converted to SACOG’s SACSIM Employment Categories using Census ACS data for occupation by industry. Finally, the number of low-wage jobs by jurisdiction are calculated by multiplying the percent of low-wage jobs in each category by each jurisdiction’s number of jobs in each employment category from SACOG’s 2016 employment inventory.

B: Units under \$1,000 per month are based on Occupied Contract Rent and Unoccupied Rent Asked totals from the 2017 5-Year Census ACS (Table B25056: Contract Rent and Table B25061: Rent Asked). The \$1,000 per month threshold represents 30% of income for household with 1.5 workers making \$2,300/month.

C: Jobs/Housing Fit Ratio is Column A divided by Column B.

D: Unweighted variance is calculated by taking the difference between Column C and the regional median (2.2).

ADJUSTMENT FACTOR WEIGHTING

The Adopted RHNA Methodology employs weighting and caps to emphasize and deemphasize the resulting impact of unweighted variances described in the adjustment factor tables above. Given the fact that the unweighted variances are widely different measurements, such weighting/capping is necessary to ensure any one adjustment is not dramatically overshadowing the other two.

During the development of the RHNA methodology, SACOG explored using high emphasis or moderate emphasis for each adjustment factor. A high emphasis adjustment factor is weighted and capped such that jurisdictions do not receive more than a 15 percent adjustment. A Moderate emphasis adjustment factor is weighted and capped such that jurisdictions do not receive more than a 10 percent adjustment. While the objectives must be addressed separately, there is a high correlation between Regional Income Parity and Affirmatively Furthering Fair Housing. Recognizing this potential overlap, the Adopted RHNA Methodology reduces the emphasis on Regional Income Parity to moderate, but leaves the other two adjustment factors with high impact.

Adjustment Factors		
Regional Income Parity	Affirmatively Furthering Fair Housing	Jobs/Housing Fit
 Moderate Impact	 High Impact	 High Impact

The table on the following page details the resulting allocations under the Adopted RHNA Methodology. The final table summarizes the four income category breakdown of the Adopted RHNA Methodology.

Adopted RHNA Methodology Lower-Income Calculation

Jurisdiction	Total RHNA ¹	Affordable Base (40.7% of Total RHNA)	Regional Income Parity Adjustment Factor			Affirmatively Furthering Fair Housing (AFFH) Adjustment Factor			Jobs/Housing Fit Adjustment Factor			Adjustment Redistribution ⁴			Summary ⁵	
			Unweighted Variance ²	Weighted Variance (85% of Variance, Cap of 10%)	Adjustment Factor ³	Unweighted Variance ²	Weighted Variance (25% of Variance, Cap of 15%)	Adjustment Factor ³	Unweighted Variance ²	Weighted Variance (7.5% of Variance, Cap of 15%)	Adjustment Factor ³	Total Adjustments	Remainder Distributed Proportionally	Updated Total Adjustments	Lower-Income RHNA	% of Total RHNA
Placerville	259	105	-7.5%	-6.4%	-7	-37.0%	-9.3%	-10	50%	3.8%	4	-13	-2	-15	90	34.7%
El Dorado County Uninc Tahoe Basin	359	146												0	146	40.7%
El Dorado County Unincorporated	4,994	2,033	6.1%	5.2%	105	2.4%	0.6%	12	40%	3.0%	61	178	-48	130	2,163	43.3%
Auburn	310	126	-1.5%	-1.3%	-2	-37.0%	-9.3%	-12	0%	0.0%	0	-14	-3	-17	109	35.2%
Colfax	97	39	-4.7%	-4.0%	-2	-37.0%	-9.3%	-4	-120%	-9.0%	-4	-10	-1	-11	28	28.9%
Lincoln	5,120	2,085	5.4%	4.6%	96	33.1%	8.3%	172	60%	4.5%	94	362	-49	313	2,398	46.8%
Loomis	352	143	4.8%	4.1%	6	63.0%	15.0%	21	220%	15.0%	21	48	-3	45	188	53.4%
Rocklin	5,661	2,305	6.1%	5.2%	120	63.0%	15.0%	346	220%	15.0%	346	812	-55	757	3,062	54.1%
Roseville	12,066	4,913	5.9%	5.1%	248	32.3%	8.1%	397	310%	15.0%	737	1,382	-117	1,265	6,178	51.2%
Placer County Uninc Tahoe Basin	435	177												0	177	40.7%
Placer County Unincorporated	7,419	3,021	5.0%	4.2%	128	-3.5%	-0.9%	-26	80%	6.0%	181	283	-72	211	3,232	43.6%
Citrus Heights	697	284	-4.2%	-3.6%	-10	-37.0%	-9.3%	-26	-140%	-10.5%	-30	-66	-7	-73	211	30.3%
Elk Grove	8,263	3,364	7.3%	6.2%	208	34.9%	8.7%	294	190%	14.3%	479	981	-80	901	4,265	51.6%
Folsom	6,363	2,591	11.8%	10.0%	259	63.0%	15.0%	389	740%	15.0%	389	1,037	-61	976	3,567	56.1%
Galt	1,926	784	0.0%	0.0%	0	-33.2%	-8.3%	-65	-90%	-6.8%	-53	-118	-19	-137	647	33.6%
Isleton	28	11	-10.9%	-9.2%	-1	-37.0%	-9.3%	-1	-170%	-12.8%	-1	-3	0	-3	8	28.6%
Rancho Cordova	9,067	3,692	-3.0%	-2.5%	-93	-28.2%	-7.1%	-260	50%	3.8%	138	-215	-88	-303	3,389	37.4%
Sacramento	45,580	18,558	-4.1%	-3.5%	-641	-6.3%	-1.6%	-290	-30%	-2.3%	-418	-1,349	-440	-1,789	16,769	36.8%
Sacramento County Unincorporated	21,272	8,661	-3.1%	-2.7%	-230	-19.3%	-4.8%	-418	-100%	-7.5%	-650	-1,298	-205	-1,503	7,158	33.6%
Live Oak	412	168	-6.8%	-5.8%	-10	-37.0%	-9.3%	-16	-170%	-12.8%	-21	-47	-4	-51	117	28.4%
Yuba City	3,308	1,347	1.1%	0.9%	12	-7.3%	-1.8%	-25	-90%	-6.8%	-91	-104	-32	-136	1,211	36.6%
Sutter County Unincorporated	729	297	6.5%	5.5%	16	-2.7%	-0.7%	-2	-90%	-6.8%	-20	-6	-7	-13	284	39.0%
Davis	2,075	845	-1.9%	-1.6%	-13	52.8%	13.2%	112	10%	0.7%	6	105	-20	85	930	44.8%
West Sacramento	9,471	3,856	-4.5%	-3.8%	-146	4.7%	1.2%	46	0%	0.0%	0	-100	-91	-191	3,665	38.7%
Winters	552	225	-0.4%	-0.3%	-1	-37.0%	-9.3%	-21	10%	0.7%	2	-20	-5	-25	200	36.2%
Woodland	3,087	1,257	-2.8%	-2.4%	-30	-24.8%	-6.2%	-78	-60%	-4.5%	-57	-165	-30	-195	1,062	34.4%
Yolo County Unincorporated	57	23	-4.0%	-3.4%	-1	-11.0%	-2.7%	-1	210%	15.0%	3	1	-1	0	23	40.4%
Marysville	167	68	-4.5%	-3.8%	-3	22.5%	5.6%	4	-110%	-8.3%	-6	-5	-2	-7	61	36.5%
Wheatland	499	203	5.8%	4.9%	10	-37.0%	-9.3%	-19	-130%	-9.8%	-20	-29	-5	-34	169	33.9%
Yuba County Unincorporated	2,887	1,175	0.3%	0.2%	3	-7.9%	-2.0%	-23	-150%	-11.3%	-132	-152	-28	-180	995	34.5%
Total	153,512	62,502			21			496			958	1,475	-1,475	-	62,502	

1) See the Total RHNA Calculation section above for how each jurisdiction's total RHNA number is derived.

2) See the Adjustment Factors section above for how each jurisdiction's unweighted variances for each adjustment factor are derived.

3) The Adjustment Factor is calculated by multiplying each adjustment factor's weighted variance by the affordable base, which is 40.7% of each jurisdiction's Total RHNA.

4) When the adjustment factors do not sum to 0, the remainder must be redistributed to ensure exactly 62,502 lower-income units are allocated. This redistribution is done proportional to each jurisdiction's Total RHNA.

5) The summary columns show the resulting lower-income units and the proportion of each jurisdiction's Total RHNA the lower-income units represent.

ADOPTED RHNA METHODOLOGY

Jurisdiction	Lower Income Units				Higher Income Units		Total RHNA
	Very Low	Low	Very Low + Low	% of Total RHNA (VL+L)	Moderate	Above Moderate	
Placerville	56	34	90	34.7%	50	119	259
El Dorado County Uninc Tahoe Basin	91	55	146	40.7%	63	150	359
El Dorado County Unincorporated	1,350	813	2,163	43.3%	840	1,991	4,994
Auburn	68	41	109	35.2%	60	141	310
Colfax	17	11	28	28.9%	21	48	97
Lincoln	1,496	902	2,398	46.8%	807	1,915	5,120
Loomis	117	71	188	53.4%	49	115	352
Rocklin	1,911	1,151	3,062	54.1%	771	1,828	5,661
Roseville	3,855	2,323	6,178	51.2%	1,746	4,142	12,066
Placer County Uninc Tahoe Basin	110	67	177	40.7%	77	181	435
Placer County Unincorporated	2,017	1,215	3,232	43.6%	1,242	2,945	7,419
Citrus Heights	132	79	211	30.3%	144	342	697
Elk Grove	2,661	1,604	4,265	51.6%	1,186	2,812	8,263
Folsom	2,226	1,341	3,567	56.1%	829	1,967	6,363
Galt	404	243	647	33.6%	379	900	1,926
Isleton	5	3	8	28.6%	6	14	28
Rancho Cordova	2,115	1,274	3,389	37.4%	1,684	3,994	9,067
Sacramento	10,463	6,306	16,769	36.8%	8,545	20,266	45,580
Sacramento County Unincorporated	4,466	2,692	7,158	33.6%	4,186	9,928	21,272
Live Oak	73	44	117	28.4%	87	208	412
Yuba City	756	455	1,211	36.6%	622	1,475	3,308
Sutter County Unincorporated	177	107	284	39.0%	132	313	729
Davis	580	350	930	44.8%	340	805	2,075
West Sacramento	2,287	1,378	3,665	38.7%	1,722	4,084	9,471
Winters	125	75	200	36.2%	104	248	552
Woodland	663	399	1,062	34.4%	601	1,424	3,087
Yolo County Unincorporated	14	9	23	40.4%	10	24	57
Marysville	38	23	61	36.5%	31	75	167
Wheatland	105	64	169	33.9%	98	232	499
Yuba County Unincorporated	621	374	995	34.5%	561	1,331	2,887
Total	38,999	23,503	62,502	40.7%	26,993	64,017	153,512

Notes: The Adopted RHNA Methodology (see the prior page) determines how many lower income (very low + low income) units are allocated to each jurisdiction. Since the total RHNA is already known (see the total RHNA Calculation section), this means the higher income (moderate + above moderate income) units are also known. The lower income and higher income units are broken down into the four RHNA income categories the same way for each jurisdiction. At the regional level, very low income units represent 62.4% of all lower income units and low income units represent the remaining 37.6% of lower income units. These percentages are multiplied by each jurisdiction's final lower income RHNA to yield the number of very low and low income units. Similarly, moderate income units represent 29.7% of the region's higher income units and above moderate income units represent 70.3% of the region's higher income units. These percentages are multiplied by each jurisdiction's final higher income RHNA to yield the number of moderate and above moderate income units.

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