STATE OF CALIFORNIA - BUSINESS, CONSUMER SERVICES AND HOUSING AGENCY EDMUND G. BROWN JR., *Governor*

DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
DIVISION OF HOUSING POLICY DEVELOPMENT
2020 W. El Camino Ave
Sacramento, CA 95833-1829
916) 263-2911 FAX: (916) 263-7453
www.hcd.ca.gov

January 10, 2014

Mr. Ted Smalley
Executive Director
Tulare County Association of Governments
210 N. Church St., Suite B
Visalia, CA 93291

Dear Mr. Smalley,

RE: 5th Cycle Regional Housing Need Determination for Housing Element Updates

This letter provides Tulare County Association of Governments (Tulare CAG) its 5th cycle regional housing need assessment (RHNA) determination for the 9.75-year projection period of January 1, 2014 through September 30, 2023. The Department of Housing and Community Development (Department) is required to determine Tulare CAG's existing and projected housing need pursuant to State housing law, Government Code (GC) Section 65584, et. seq..

As you know, Senate Bill 375 (Chapter 728, Statutes of 2008) further strengthened the existing coordination of regional housing and transportation planning. Metropolitan Planning Organizations (MPOs) are now required to develop and incorporate a new sustainable community strategy (SCS) in their Regional Transportation Plans (RTP) to achieve greenhouse gas emission reductions and accommodate the region's housing need. SB 375 amended the RHNA schedule and methodology and requires local governments to update their housing elements no later than 18 months from the date Tulare CAG adopts the RTP.

The Department has prepared Tulare CAG's RHNA determination based on Tulare CAG's estimated RTP adoption date of March 17, 2014. Please note that in the event the RTP is adopted on a different date, the RHNA and projection period will not change, but the housing element planning period and element due date will change accordingly. The Department must be notified of any change to the RTP adoption date and will reflect RTP adoption date changes on its website at: http://www.hcd.ca.gov/hpd/hrc/plan/he/web_he_duedate.pdf.

For your information, GC Section 65584.01(d)(1) allows 30 days from the date of this letter to file an objection and proposed alternative to the Department's determination (Attachment 1). An objection and proposed alternative must be based on demographic and methodology factors set forth in the statute.

The Department determined Tulare CAG's regional housing need to be 26,910 for the projection period, from January 1, 2014 to September 30, 2023. In assessing Tulare CAG's regional housing need, the Department considered the critical role housing plays in developing sustainable communities and supporting employment growth.

The Department further considered Tulare CAG's growth forecast, socio-economic base and potential for household formation trends to generate housing demand at a changing pace. Consideration was also given to the extraordinary uncertainty regarding national, State, local economies and housing markets. As a result, for this RHNA cycle only, the Department made an adjustment to account for abnormal vacancies and unique market conditions due to prolonged recessionary conditions, high unemployment, and unprecedented foreclosures.

The Department and representatives of Tulare CAG completed the consultation process specified in statute through correspondence, meetings and conference calls conducted between February 2013 and January 2014. The Department appreciates the assistance provided throughout the consultation process by Tulare CAG representatives which included Mr. Ben Kimball, Deputy Executive Director, and Ms. Chelsey Norton, AICP Project Manager, Mintier Harnish. The Department also received assistance from Mr. Walter Schwarm, demographics expert with the Department of Finance's Demographic Research Unit.

In completing Tulare CAG's RHNA, the Department applied methodology and assumptions regarding the following factors (GC Section 65584.01(c)(1)):

- anticipated household growth associated with projected population increases;
- household size data and trends in household size;
- rate of household formation, or headship rates, based on age, gender, ethnicity, or other established demographic measures;
- vacancy rates in existing housing stock, and for healthy housing market functioning and regional mobility, as well as housing replacement needs;
- other characteristics of the composition of the projected population; and
- relationship and any imbalance between jobs and housing.

Data, assumptions, and draft forecasts of population, employment and housing provided by Tulare CAG in regards to the above factors were considered. Assumptions regarding the rate with which existing vacant "for sale" and "for rent" housing units may be absorbed by the start of the projection period in 2014 was determined based on consultation with Tulare CAG.

Attachments 1 and 2 to this letter describe details of the Department's methodology and RHNA income category for Tulare CAG to distribute the 26,910 regional housing unit need among all its local governments. Each locality must receive a RHNA share of very-low and low-income units. The distribution of RHNA for lower income, moderate-income, and above-moderate income categories in the aggregate cannot be less than the total for each of these income categories shown in Attachment 1.

Upon receipt of the Department's final RHNA determination, Tulare CAG is responsible for developing a RHNA distribution methodology and adopting a RHNA Plan for the projection period of January 1, 2014 through September 30, 2023. The RHNA represents the *minimum* amount of residential development capacity all jurisdictions must plan to accommodate through zoning and appropriate planning strategies. RHNA is not to be used within local general plans as a maximum amount or cap of residential development to plan for or approve.

Housing element law (GC Section 65584, et. seq.) requires Tulare CAG's methodology and RHNA Plan to be consistent with the following objectives:

- increasing the housing supply and mix of housing types, tenure, and affordability;
- promoting infill development and socio-economic equity, protecting environmental and agricultural resources, and encouraging efficient development patterns;
- promoting an improved intraregional relationship between jobs and housing; and
- balancing the distribution of households by income category.

Pursuant to GC Section 65584.05(h), Tulare CAG is required to submit its RHNA Plan to the Department for approval within three days of adopting the RHNA Plan. Upon approval by the Department of the RHNA Plan, Tulare CAG is to distribute to all its local government members their income category shares of new housing needs to be addressed in their housing element updates covering the 2015 - 2023 planning period.

When updating their housing elements, local governments may take RHNA credit for units approved (entitled or permitted) since the January 1, 2014 start date of the RHNA projection period. Localities are also required to describe how units were credited to different income categories based on actual or projected sale price or rent level data. Any city planning to accommodate a portion of RHNA on sites within its Sphere of Influence (SOI) needs to include an annexation program in the housing element. The annexation program needs to demonstrate SOI sites can be annexed early enough in the planning period to make adequate sites available to avoid other rezoning pursuant to GC sections 65583(c)(1)(A), and 65583(f).

Regarding transfers of housing need, AB 242 (Chapter 11, Statutes of 2008) amended GC Section 65584.07. RHNA transfers agreed between local governments may occur until RHNA Plan adoption. Once Tulare CAG adopts its RHNA Plan, transfers meeting specified conditions may only occur from the county to cities within the county. Transfers after the due date of the housing element are restricted to annexations and incorporations and must be completed within specified timeframes. The numbers of units by income to be transferred are determined either based on mutual agreement between affected local governments, or, when no agreement is reached, by the entity responsible for allocating housing need (Tulare CAG). The Department must be notified of all transfers; jurisdictions affected by RHNA transfers must amend their housing element within the timeframe specified in statute.

The Department commends Tulare CAG's efforts to meet the objectives of SB 375 and especially appreciates the assistance provided by Ms. Chelsey Norton. We look forward to a continued partnership with Tulare CAG and its member jurisdictions in planning efforts to accommodate the region's housing need. If you need assistance or have any question, please contact me or Anda Draghici, Housing Policy Senior Specialist, at (916) 263-2911.

Sincerely,

Glen A. Campora

Glen A. Campora
Assistant Deputy Director

Enclosures

ATTACHMENT 1

HCD REGIONAL HOUSING NEED DETERMINATION: TULARE CAG
Projection Period: January 1, 2014 through September 30, 2023

Income Category	Percent	Regional Housing Need (rounded) [1]
Very-Low	23.1%	6,215
Low	17.3%	4,655
Moderate	17.0%	4,575
Above-Moderate	42.6%	11,465
Total	**100.0%** [2]	**26,910** [3]

(1) The statutory objective regarding RHNA requires HCD, in consultation with Department of Finance (DOF) and councils of governments (COGs), to determine projected household growth and housing need based on DOF population projections and COG regional population forecasts and requires regional and local jurisdictions to plan to accommodate capacity for all of the projected RHNA. The Legislature recognizes that different assumptions and variances in methodologies can be used that can result in different population projections. Projection of housing need developed by DOF and HCD for RHNA purposes does not consider local government constraints.

For this RHNA cycle only (due to unique conditions not expected to recur to impact future RHNA cycles), the housing need was adjusted downward to account for an estimated 20 percent absorption level of unprecedented high vacancies in existing stock due to extraordinary conditions including high foreclosures and economic uncertainties.

(2) The income category percentages reflect the minimum percentage to apply against the total RHNA decided by TCAG in determining housing need for very-low, low, and moderate income households. Each category is defined by Health and Safety Code (Section 50093, et seq.). Percentages are derived from the 2007-2011 American Community Survey's number of households by income, over 12 month periods. Housing unit need under each income category is derived from multiplying the portion of households per income category against the total RHNA determination.

(3) The 26,910 allocation (see Attachment 2) reflects TCAG's projected minimum housing need (rounded) and an adjustment (-1,992) for existing excess vacant units in estimating 80% of vacant units is not absorbed before 2014. This column represents the minimum housing need that TCAG's RHNA Plan must address in total and also for very-low, low, and moderate income categories.

Based on the region's estimated RTP adoption date of March 17, 2014 (subject to change):

5th Update of the Housing Element Due Date: September 30, 2015

ATTACHMENT 2
HCD REGIONAL HOUSING NEED DETERMINATION: TULARE CAG

1	**Population Projection: September 30, 2023 (TCAG Projection)**				**562,438**
2	*less: Group Quarters Population (DOF Projection)*				**6,171**
3	**Household (HH) Population September 30, 2023**				**556,267**
	Household Formation Groups	**HH Population**		**2023 Households**	
	All Age Groups (DOF)	**556,267**	***HH Formation or Headship Rate***	**166,840**	
	Under 15	**-**			
	15 - 24 years	**89,147**	**7.94%**	**7,082**	
	25 - 34 years	**83,770**	**37.21%**	**31,168**	
	35 - 44 years	**67,462**	**47.24%**	**31,867**	
	45 - 54 years	**57,499**	**51.58%**	**29,660**	
	55 - 64 years	**52,062**	**53.55%**	**27,880**	
	65 -74 years	**40,115**	**56.11%**	**22,508**	
	75 - 84 years	**20,368**	**60.46%**	**12,314**	
	84+	**6,996**	**62.36%**	**4,363**	
4	**Projected Households-September 30, 2023 - Tulare cohort-based HH Projections**				**166,840**
5	*less: Households at Beginning of Projection Period (January, 2014, DOF Projections)*				139,230
6	**Household Growth: 9.75 Year Projection Period**				**27,610**
7	**Vacancy Allowance**	Owner	Renter	Total	
	Tenure Percentage per 2010 Census	**58.75%**	**41.25%**		
	HH Growth by Tenure	16,222	11,389	27,611	
	Healthy Vacancy Rate	1.50%	4.00%		
	Vacancy Allowance	243	456	699	699
8	**Replacement Allowance (minimum)**	**0.69%**		28,310	194
					28,503
9	*less: Adjustment for Absorption of Existing Excess Vacant Units*				
	Estimate 20% Absorbed, 80% Not Absorbed by 2014	Effective Vacant Units	Healthy Market Units	Differential	
	Derived (2010 Census, HH Growth, & Vacancy Rate)	(5,233)	3,459	-1775	
	Total 2012 Housing Stock	143,297			
	Existing Vacant Unit (Others) Adjustment	1.88%	1.73%		
	Total Adjusted Existing Vacant Units (Others)	(2,696)	2,479	-217	
	Estimated "Excess" Vacant Units Not Absorbed by 2014	**80%**		-1,992	-1,594
TULARE CAG FINAL REGIONAL HOUSING NEED DETERMINATION					**26,910**

1 **2023 Population:** Pursuant to Government Code Section 65584.01(b), and in consultation with TCAG, the Department used TCAG's population projections which was within 3% of the Population Projections provided by the Department of Finance Population Projections for September 2023.

2 **Group Quarter Population:** Figure is an estimate of persons residing either in a group home, institution, military, or dormitory using the 2010 Census proportion of group quarters in total population. As this population doesn't constitute a "household" population generating demand for a housing unit, the group quarter population is excluded from the calculation of the household population, and is not included in the housing need.

3 **2023 Household (HH) Population:** The portion of population projected to reside in housing units after subtracting the group quarter population from total projected population. The composition by race/ethncity for the household population was calculated as an average between DOF's and TCAG's population projections' race/ethnicity compositions.

4 **Projected 2023 Households (HHs):** The September 2023 number of households is derived by applying (to 2023 HH population by age and race/ethnicity) household formation rates. The household formation rates were calculated by applying half of the 1990-2010 average annual change rate to the 2010 Census-based household formation rates, as provided by DOF. HH formation or headship rates reflect the propensity of different population groups (age, racial and ethnic) to form households.

ATTACHMENT 2
HCD REGIONAL HOUSING NEED DETERMINATION: TULARE CAG

5 **Households at Beginning of Projection Period:** The baseline number of households at the beginning of the projection period (January 2014) must be projected, as a direct effect of amendment to Section 65588(e)(6) specifying the new projection period to start on either June 30 or December 31 whichever date most closely precedes the end of the current housing element period. As such, the 2014 household number reflects the January 1, 2014 DOF-projected number of households.

6 **Household (HH) Growth:** This figure reflects projected HH growth and need for (occupied) new units.

7 **Vacancy Allowance:** An allowance (unit increase) is made to facilitate availability and mobility among owner and renter units. Owner/Renter % is based on Census 2010 data. A smaller rate is applied to owner units due to less frequent mobility than for renter households. Information from a variety of authoritative sources supports an acceptable range of 1 to 4% for owner units and 4 to 8% for renter units depending on market conditions.

8 **Replacement Allowance:** Rate (0.69%) reflects the housing losses that localities annually reported to DOF each January for years 2002-2011.

9 **Adjustment for Absorption of Existing Excess Vacant Units:** For this RHNA cycle only (due to extraordinary uncertainty regarding conditions impacting the economy and housing market not expected to similarly impact future RHNA cycles), a new one-time adjustment was made to account for unprecedented high vacancies in existing stock due to unusual conditions including high foreclosures and economic uncertainties. An absorption rate of 20% of existing excess vacant units is assumed to occur in shrinking current excess vacant units before the start of the 2014 RHNA projection period. This results in applying a 80% adjustment to account for units not absorbed, reflected in a downward adjustment of (- 1,992). Existing housing stock consists of two components: (1) housing units for sale and rent in existing housing stock that are above the housing units required to maintain the healthy market condition, calculated as the number of units in housing stock (for sale + for rent + sold, not occupied+rented, not occupied + occupied units), (2) housing units in the "vacant units others" category of existing housing stock above the "normal" rate considered to be at the level of 2000, at 1.73% of total housing units, as provided by the 2000 Census. The Department used 2010 Census Demographic profile data (DP-1) and desirable "normal" vacancy rates by tenure, in conjunction with the region's household growth and proposed household formation rates. The vacancy adjustment is limited to not exceed the differential between the 2010 Census vacant units and the healthy market vacant units rate associated with the region's annual household growth. As the adjustment was below the differential, the adjustment was applied in calculating the RHNA determination.

RHNA Projection Period January 1, 2014 to September 30, 2023: Pursuant to SB 375, the start of the *projection* period (in effect January 1, 2014) was determined pursuant to GC 65588(e)(6), which requires the new projection period to start on June 30 or December 31 that most closely precedes the end of the current housing element period, which for Tulare County region is June 30, 2014. The end of the projection period was determined pursuant to GC 65588(e)(5) to be the end of the housing element planning period. *Note: For projection purposes the end of the projection period is rounded to the end of the month.*

Housing Element Planning Period September 30, 2015 to September 30, 2023: Pursuant to SB 375, the start of the *planning* period was determined pursuant to GC 65588(e)(5), 18 months from the estimated adoption date of TCAG's Regional Transportation Plan, as notified to HCD, with the date rounded to the end of month for projection purposes. The end of the planning period was calculated pursuant to GC 65588(e)(3)(A), 18 months after the adoption of the second RTP, provided that it is not later than eight years from the adoption of the previous housing element. If the actual RTP adoption date differs from the estimated date of March 17, 2014, the RHNA determination and the projection period will not change, however the housing element due date, and implicitly, the housing element planning period would change accordingly.