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# MEETING

**Agenda:** Kings County Association of Governments  
RHNA Advisory Committee Meeting #7

**Place:** Kings County Association of Governments  
339 W. "D" Street, Suite B, Lemoore, CA

Participants may also attend remotely via Zoom or telephone:

<https://us06web.zoom.us/j/88683396211?pwd=OE8xNWhtQm1QdmlqaWhRK1hQalkyZz09>

**Dial by your location:**

- +1 346 248 7799 US (Houston)
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- +1 301 715 8592 US (Washington DC)

**Meeting ID:** 886 8339 6211

**Passcode:** 463088

**Find your local number:** <https://us06web.zoom.us/j/kcKSj2W4ZH>

**Attention:** *Please mute your microphone unless speaking*

**Time:** Wednesday, October 12, 2022 (2:00 p.m. or immediately following the KCAG TAC meeting)

<u>ITEM</u>	<u>PAGE</u>	<u>ACTION</u>
<b>I. CALL MEETING TO ORDER</b>		
A. Unscheduled Appearances		
B. Meeting Minutes		
1. Draft Minutes of July 13, 2022	1	Approval
<b>II. DISCUSSION ITEMS</b>		
A. RHNA Methodology	3	Recommendation
<b>III. NEXT STEPS</b>		
A. October 26, 2022 KCAG Commission Public Hearing – RHNA Methodology approval		
<b>IV. ADJOURNMENT: Next meeting TBD</b>		



## **MEETING NOTES**

### **KCAG RHNA Committee Meeting #6 Wednesday, July 13, 2022 Via Zoom**

#### **Participants Present**

Terri King, KCAG  
Chuck Kinney, County of Kings, Kings County Development Agency  
Kristi Baley, City of Lemoore  
Mary Beatie, City of Hanford  
Kao Yang, City of Avenal  
Sandra Lerma, City of Hanford  
Valerie Bega, City of Corcoran  
Gabrielle Myers, City of Hanford  
Kevin Tromborg, City of Corcoran  
John Douglas, JHD Planning, LLC  
Edith Medina, Civic Solutions

John Douglas called the meeting to order at approximately 2:06 p.m.

#### **I. INTRODUCTIONS**

There were no unscheduled appearances.

Meeting minutes for June 8, 2022 were approved without objection.

#### **II. DISCUSSION ITEMS**

##### **A. Revised RHNA Methodology**

Douglas provided an update on the RHNA preliminary methodology. Since the preliminary RHNA methodology was discussed at the last meeting two changes have occurred: 1) more recent forecast data became available from the RTP update; and 2) HCD provided feedback regarding the preliminary methodology.

Because the growth forecast is a fundamental component of the RHNA methodology required by law, it is necessary to revise the calculations to reflect the data used in the RTP. As discussed in the staff report, the most significant change in the housing forecast is a shift in the distribution of projected growth from the unincorporated county areas to the cities, with the largest increases in Hanford and Lemoore. Changes in the employment forecast are less pronounced, with reductions in projected jobs in Hanford and Lemoore and increases in the

other jurisdictions. The total countywide forecast is unchanged for both housing and employment.

Regarding the second issue, HCD staff indicated that the preliminary RHNA allocations appear to be reasonable, but they recommended that the methodology be revised to prioritize projected housing and employment growth rather than historical trends to better align with State policy. The preliminary methodology assigned a weight of 20% each to recent population growth and recent employment growth. Revising the methodology to replace these historical factors with projected housing and employment growth would address HCD's concern.

To address these two new issues, a revised draft RHNA methodology was prepared based on the following factors:

- 40% RTP housing forecast (2022-2050)
- 40% RTP employment forecast (2022-2050)
- 20% TCAC opportunity scores
- Housing vacancy rate adjustment

When these revised factors are used, the preliminary RHNA allocations would be as follows:

Jurisdiction	RHNA (Total units)	
	Previous	Revised
Avenal	43	277
Corcoran	468	715
Hanford	5,762	5,547
Lemoore	2,487	2,329
County unincorporated	668	561
TOTAL	9,429	9,429

Douglas noted that when compared to the last RHNA cycle, all the jurisdictions have lower allocations except for Hanford, and that in other regions there have typically been higher allocations in the more urban areas.

Douglas opened the floor to discussion and asked if any Committee members had questions or objections. All members indicated they had no objections to the revised draft methodology.

### III. NEXT STEPS

The next step is for KCAG Commission to hold a public hearing on July 27<sup>th</sup> to formally receive public comments on the RHNA draft methodology. If accepted by the Commission the draft methodology would then be submitted to HCD for formal review.

### IV. ADJOURNMENT

The meeting was adjourned at approximately 2:30 p.m.

DATE: October 12, 2022

TO: KCAG RHNA Advisory Committee

FROM: John Douglas, AICP  
JHD Planning LLC

SUBJECT: RHNA Status

Agenda Item #II.A

RHNA Status

On July 27, 2022 the KCAG Commission unanimously accepted the Draft RHNA Methodology and authorized staff to submit the methodology to HCD for review pursuant to State law. On September 21, 2022 HCD issued a letter (Attachment 1) finding that the Draft RHNA Methodology furthers the statutory objectives and they have no objections.

The next step in the RHNA process is for the KCAG Commission to conduct a public hearing to consider final approval of the RHNA Methodology (Government Code 65584.04[k]). If the Commission approves the Final Methodology, Draft RHNA Allocations based on the Final Methodology must then be posted for public review with the opportunity for appeals. The draft RHNA allocations were included in the Methodology and have not changed since the last RHNA Advisory Committee meeting on July 13<sup>th</sup> and KCAG Commission hearing on July 27<sup>th</sup>. The draft allocations were as follows:

Jurisdiction	Very Low		Low		Moderate		Above Moderate		Total
	Units	%	Units	%	Units	%	Units	%	Units
Avenal	48	17.3%	37	13.3%	55	20.0%	137	49.4%	277
Corcoran	122	17.1%	116	16.3%	118	16.5%	359	50.2%	715
Hanford	1,370	24.7%	993	17.9%	1,066	19.2%	2,119	38.2%	5,547
Lemoore	586	25.1%	437	18.8%	408	17.5%	899	38.6%	2,329
Unincorporated	132	23.5%	89	15.9%	106	18.9%	234	41.8%	561
County totals	2,257	23.9%	1,672	17.7%	1,753	18.6%	3,747	39.7%	9,429

RHNA Appeals Process

If the KCAG Commission approves the final RHNA Methodology, the RHNA allocations must be published and an opportunity for appeals of the Draft RHNA Allocations commences. Within 45 days following publication of the Draft Allocations, a local government within the KCAG region or HCD may file an appeal with KCAG requesting a revision to the allocation to one or more jurisdictions (Government Code 65584.05[b]). Appeals shall be based upon comparable data available for all affected jurisdictions and accepted planning methodology, supported by adequate documentation, and shall include a statement as to why the revision is necessary to further the intent of the statutory RHNA objectives. An appeal must also be consistent with the development pattern in the sustainable communities strategy and shall be limited to any of the following circumstances:

- (1) The council of governments failed to adequately consider the information submitted pursuant to subdivision (b) of Section 65584.04.

- (2) The council of governments failed to determine the share of the regional housing need in accordance with the approved RHNA methodology in a manner that furthers, and does not undermine, the intent of the statutory objectives.
- (3) A significant and unforeseen change in circumstances has occurred in the local jurisdiction or jurisdictions that merits a revision to the RHNA.

If no appeals are filed, the Draft RHNA Allocation shall be issued as the Proposed Final RHNA Allocation Plan. (Government Code 65584.05[c])

If any appeals are filed, they will be posted on the KCAG website and an additional 45-day comment period will begin to review the appeals. KCAG jurisdictions or HCD may file a comment on any appeal. No later than 30 days after the close of the 45-day comment period, the KCAG Commission must conduct a public hearing to consider appeals and comments received. (Government Code 65584.05[d])

#### Final RHNA Plan Adoption

No later than 45 days after the public hearing the KCAG Commission must determine whether to accept, reject, or modify each appeal and issue a proposed Final RHNA Allocation Plan. (Government Code 65584.05[e]) If the Commission adjusts the RHNA allocation based on appeals, any reduction granted to one or more jurisdictions must be reallocated to other jurisdictions such that the total RHNA allocation for the region is maintained (Government Code 65584.05[f]).

Within 45 days after the issuance of the proposed final allocation plan, the KCAG Commission must hold a public hearing to adopt the final RHNA Allocation Plan. (Government Code 65584.05[g])

#### Next Steps

A KCAG Commission public hearing to consider formal adoption of the RHNA Methodology is tentatively scheduled for October 26<sup>th</sup>. If adopted, the proposed RHNA allocations will then be posted and a 45-day appeals process will commence (closing on approximately December 12). If no appeals are filed, the Draft RHNA Allocation Plan will then be issued as the Proposed Final RHNA Allocation Plan and a public hearing will be scheduled for the Commission to consider adoption of the Final RHNA Plan.

#### Recommended Action

Recommend that the KCAG Commission:

1. Receive public testimony
2. Adopt Resolution approving the 6<sup>th</sup> Cycle RHNA Methodology

#### Attachments

1. HCD letter of September 21, 2022
2. Draft KCAG Commission Resolution

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

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



September 21, 2022

Terri King, Executive Director  
Kings County Association of Governments  
339 West D Street, Suite B  
Lemoore, CA 93245

Dear Terri King:

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

Thank you for submitting the draft Kings County Association of Government's (KCAG) Sixth Cycle Regional Housing Need Allocation (RHNA) Methodology. Pursuant to Government Code Section 65584.04(i), the California Department of Housing and Community Development (HCD) is required to review draft RHNA methodologies to determine whether a methodology furthers the statutory objectives described in Government Code Section 65584(d).

The draft KCAG RHNA methodology begins with the total regional determination provided by HCD of 9,429 units. Next, the methodology uses three weighted factors to adjust the total RHNA for each jurisdiction:

- Projected Housing Growth (40 percent) – This factor allocates more RHNA to jurisdictions with higher projected household growth based on the Regional Growth Forecast that is currently in development for KCAG's 2022 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS).
- Projected Employment Growth (40 percent) – This factor allocates more RHNA to jurisdictions with higher projected job growth between 2022 and 2050 based on forecasted employment growth from the Regional Growth Forecast of the RTP/SCS.
- Access to Opportunity (20 percent) – This factor allocates more RHNA to jurisdictions with larger shares of highest, high, and moderate resourced areas based on a modified version of the TCAC/HCD Opportunity Map.

Next, a fourth factor – housing vacancy rates – is used to assign more units to cities with lower vacancy rates than the county average. This factor is intended to increase housing allocations to the cities with a proportionate decrease to the unincorporated county area.

To establish allocations across RHNA's four income categories, the methodology uses an income-shift based on median income. Each jurisdiction's income distribution in RHNA's four income categories is compared to the county's distribution then that difference is multiplied by 150 percent.

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**HCD has completed its review of the methodology and finds that the draft KCAG RHNA Methodology furthers the statutory objectives described in Government Code 65584(d).**<sup>1</sup> KCAG’s draft methodology directs more RHNA units – particularly lower income units – into high resource areas, areas with higher housing costs, and jobs-rich areas with access to more jobs via transit and lower average vehicle miles traveled (VMT). The draft methodology’s income-shift adjustment also increases the number of lower income units going to higher income areas as a percentage of their total allocation. HCD commends KCAG for including factors in the draft methodology linked to the statutory objectives such as access to opportunity.

Below is a brief summary of findings related to each statutory objective described within Government Code Section 65584(d):

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

On a per household basis, the methodology allocates more total RHNA and lower income RHNA to jurisdictions with more higher income households. Jurisdictions with higher housing costs – both in terms of home values and rent – also receive more RHNA on a per household basis. Lastly, jurisdictions with higher percentages of homeowners receive a higher percentage of lower income RHNA relative to their total allocation.

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

The draft methodology encourages more efficient development by including factors associated with the RTP/SCS growth forecasts to determine each jurisdiction’s total allocation. Jurisdictions with access to more jobs via a 30-minute commute receive more RHNA per household and more total RHNA. Jurisdictions with access to more jobs via a 45-minute transit commute also receive more RHNA per household and more total RHNA. Further, cities with lower annual VMT per household receive more RHNA per household and more total RHNA.

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

The draft methodology allocates more lower income RHNA relative to household share to

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<sup>1</sup> While HCD finds this methodology furthers statutory objectives, applying this methodology to another region or cycle may not necessarily further the statutory objectives as housing conditions and circumstances may differ.

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the jurisdictions with the highest lower income jobs-housing fit ratios. The jurisdictions with lower jobs-housing fit ratios receive less lower income RHNA allocations per household.

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

On average, jurisdictions with a larger existing share of lower income households receive smaller allocations of low- and very low-income units as a percentage of the total RHNA. For jurisdictions with higher shares of lower income households, the average lower income allocation is 34 percent of total RHNA. The average lower income allocation for cities with smaller percentages of lower income households is 43 percent.

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

Jurisdictions with more access to opportunity receive larger total and lower income allocations on a per household basis. More specifically, jurisdictions with at least 55 percent high/highest resource areas receive a share of lower income RHNA that is, on average, 158 percent of their share of households, compared to 32 percent for other jurisdictions. Further, jurisdictions with more low-resource and high-segregation/poverty areas receive smaller total RHNA and lower income allocations on a per household basis.

HCD appreciates the active role of KCAG staff in providing data and input throughout the draft KCAG RHNA methodology development and review period. HCD especially thanks John Douglas for their significant efforts and assistance.

HCD looks forward to continuing our partnership with KCAG to help its member jurisdictions meet and exceed the planning and production of the region's housing need. Support opportunities available for the KCAG region this cycle include, but are not limited to:

- Regional Early Action Planning (REAP) 2.0 – \$600 million state and federal investment to advance implementation of adopted regional plans. REAP 2.0 funding may be used for planning and implementation that accelerate infill housing development and reduce per capita vehicle miles

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- traveled. <https://hcd.ca.gov/grants-funding/active-funding/reap2.shtml>.
- Prohousing Designation Program – Ongoing awards distributed over-the-counter to local jurisdictions with compliant Housing Elements and prohousing policies. Those awarded receive additional points or preference when applying to housing and non-housing funding programs including the Affordable Housing & Sustainable Communities (AHSC), Infill Infrastructure Grant (IIG), and Transformative Climate Communities (TCC).
  - HCD also encourages all Kings County local governments to consider the many other affordable housing and community development resources available to local governments, including the Permanent Local Housing Allocation program. HCD's programs can be found at <https://www.hcd.ca.gov/grants-funding/nofas.shtml>.

If HCD can provide any additional assistance, or if you, or your staff, have any questions, please contact Annelise Osterberg, Housing Policy Specialist at (916) 776-7540 or [annelise.osterberg@hcd.ca.gov](mailto:annelise.osterberg@hcd.ca.gov).

Sincerely,



Tyrone Buckley  
Assistant Deputy Director of Fair Housing

**BEFORE THE KINGS COUNTY ASSOCIATION OF GOVERNMENTS COMMISSION**

\* \* \* \* \*

**IN THE MATTER OF APPROVING THE FINAL ) RESOLUTION NO. 22-\_\_\_\_  
METHODOLOGY FOR THE 6<sup>th</sup> CYCLE )  
REGIONAL HOUSING NEEDS ALLOCATION PLAN) RE: 6<sup>th</sup> CYCLE RHNA  
METHODOLOGY**

**WHEREAS**, the Kings County Association of Governments (KCAG) is a Metropolitan Planning Organization (MPO), pursuant to State and Federal designation; and

**WHEREAS**, Government Code Section 65584 et seq. requires KCAG to prepare a regional housing needs allocation plan, including consideration of housing needs of all income levels; and

**WHEREAS**, on January 11, 2022 the California Department of Housing and Community Development (HCD) determined that the existing and projected regional share of housing for Kings County jurisdictions is 9,429 units for the period of June 30, 2023 through January 31, 2032; and

**WHEREAS**, pursuant to Government Code Section 65584.04 KCAG is responsible for preparing and adopting a methodology for distributing the regional housing need; and

**WHEREAS**, pursuant to Government Code section 65584(d), the RHNA methodology must further the following objectives:

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

**WHEREAS**, KCAG established a RHNA Technical Advisory Committee comprised of members representing each jurisdiction in Kings County for the purpose of providing technical guidance in preparing the RHNA methodology; and

**WHEREAS**, pursuant to Government Code section 65584.04(b), in March 2022 KCAG distributed surveys regarding planning factors and fair housing issues to each member agency; and

**WHEREAS**, based upon the requirements of State law and input from HCD, local agencies and other interested stakeholders, KCAG prepared a preliminary draft RHNA methodology in compliance with Government Code Section 65584(d), which was posted and sent to HCD, KCAG member agencies and other stakeholders on May 31, 2022 for public review; and

**WHEREAS**, based upon input from HCD, local agencies and other interested stakeholders, KCAG prepared a revised preliminary draft RHNA methodology in compliance with Government Code Section 65584(d), which was posted and sent to HCD, KCAG member agencies and other stakeholders on July 21, 2022 for public review; and

**WHEREAS**, on July 27, 2022 the KCAG Commission conducted a duly noticed public hearing and invited public testimony from all interested parties. No opposition to the draft

methodology was submitted to the Commission at the hearing, and at the conclusion of the hearing the Commission directed staff to submit the draft methodology to HCD for review pursuant to Government Code section 65584.04(h); and

**WHEREAS**, on July 27, 2022 after review by the KCAG Commission the draft KCAG RHNA Methodology was posted on the KCAG website and delivered to HCD for review pursuant to Government Code section 65584.04(h); and

**WHEREAS**, on September 21, 2022 HCD issued a letter finding that the draft KCAG RHNA Methodology furthers the statutory objectives described in Government Code 65584(d); and

**WHEREAS**, on October 12, 2022 the KCAG RHNA Technical Advisory Committee recommended approval of the RHNA Methodology by the Commission; and

**WHEREAS**, on October 26, 2022 the KCAG Commission conducted a duly noticed public hearing to consider adoption of the RHNA Methodology; and

**WHEREAS**, the KCAG Commission has reviewed all comments received from the public in regard to the RHNA Methodology; and

**WHEREAS**, RHNA determinations are exempt from the California Environmental Quality Act pursuant to Division 13 (commencing with Section 21000) of the Public Resources Code.

**NOW, THEREFORE, BE IT RESOLVED**, that the KCAG Commission finds and declares as follows:

1. KCAG adopts the foregoing recitals as true and correct.
2. Based upon the facts and analysis set forth in the RHNA Methodology (Exhibit "A") attached hereto and the September 21, 2022 findings of HCD, the KCAG Commission finds that the Kings County 6<sup>th</sup> cycle RHNA Methodology has been prepared in compliance with Government Code Section 65584.04.
3. KCAG adopts the RHNA Methodology as set forth in Exhibit "A".
4. KCAG staff is directed to provide notice of the adoption of the RHNA Methodology to the jurisdictions within the region and to HCD, and publish the adopted allocation methodology, along with this Resolution, on the KCAG internet website, as required by Government Code Section 65584.04(k).
5. KCAG staff is further directed to distribute a draft allocation of regional housing needs to each local government in the region and HCD based on the adopted RHNA Methodology set forth in Exhibit "A" and shall publish the draft housing needs allocation on its internet website, pursuant to Government Code Section 65584.05(a).
6. The Executive Director or her designee(s) are directed to take such further actions as may be necessary and appropriate to carry out the intent of this Resolution.
7. This Resolution shall take effect immediately upon its adoption.

The foregoing Resolution was adopted on a motion by Commissioner \_\_\_\_\_ ,  
seconded by Commissioner \_\_\_\_\_ , at a special meeting held on the 26th day of October,  
2022 by the following vote:

AYES:

NOES:

ABSTAIN:

ABSENT:

KINGS COUNTY ASSOCIATION OF GOVERNMENTS  
COMMISSION

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Chair

**WITNESS**, my hand this \_\_\_\_\_ day of \_\_\_\_\_, 2022.

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Terri King, Executive Director

EXHIBIT "A"

6<sup>TH</sup> CYCLE RHNA METHODOLOGY  
KINGS COUNTY ASSOCIATION OF GOVERNMENTS