

2007 Fresno County Regional Housing Needs Allocation Plan

Approved
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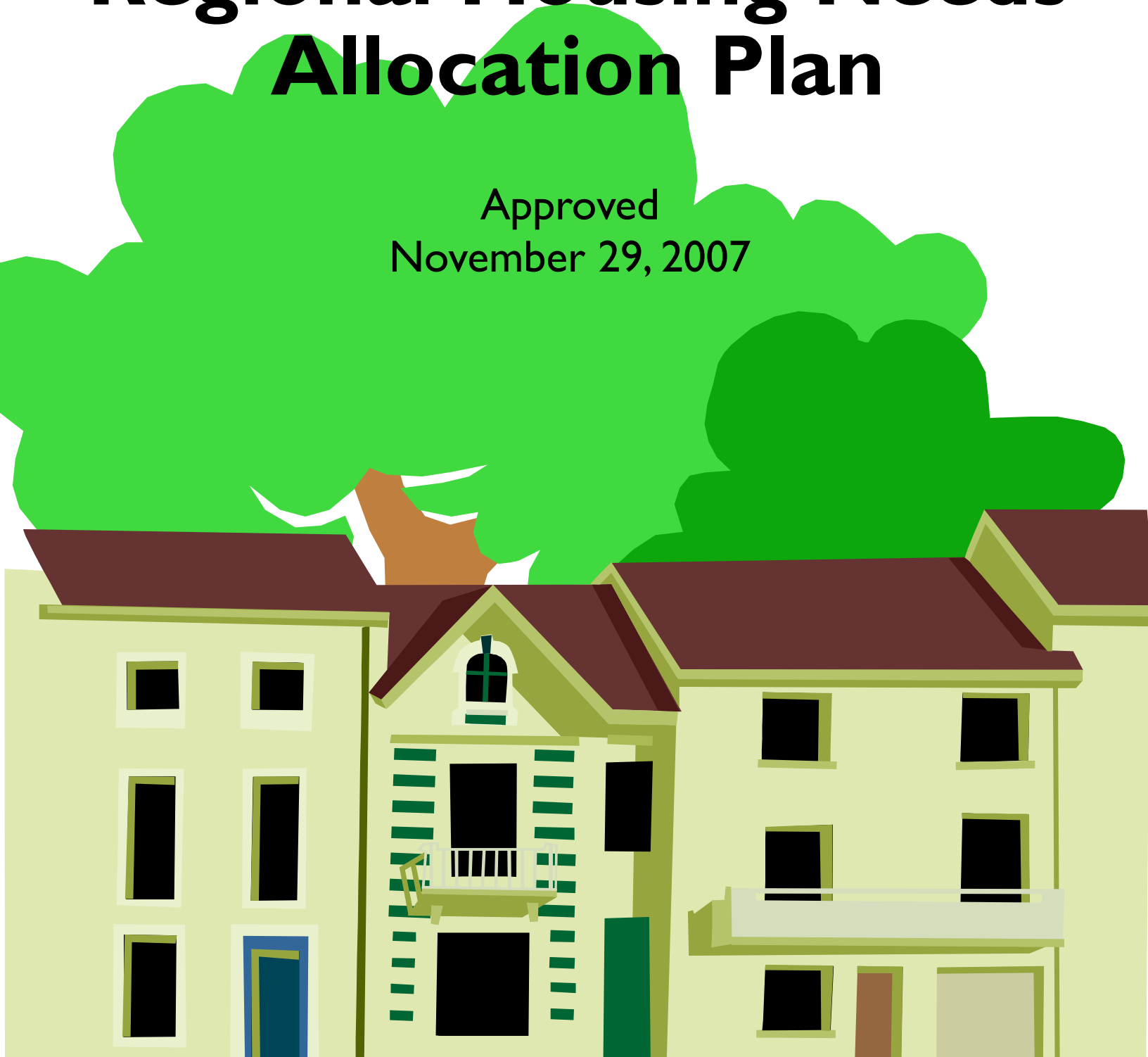


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Chapter 1

INTRODUCTION

Each city and county within the State of California is required to prepare and adopt a general plan that functions as a blueprint for the physical development of its jurisdiction. The general plan is a policy tool containing a structured set of goals and policies used by local policy makers to direct growth.

The housing element has been a required element of the general plan since 1969. Its purpose is to address the manner in which local jurisdictions attain State housing goals, the most important of which is that “the availability of housing is of vital statewide importance, and the early attainment of decent housing and a suitable living environment for every California family is a priority of the highest order.” Housing elements must identify existing and projected housing needs of all income levels, resources available to meet those needs, existing constraints, and quantifiable objectives for the construction, conservation and rehabilitation of housing units. A housing program to implement local objectives must also be identified.

State Housing Element Law (Article 10.6 of the Government Code), Section 65584 in particular, requires that existing and projected housing needs of a jurisdiction are to include the jurisdiction’s share of the regional housing need. Councils of governments are mandated to prepare regional housing needs allocation plans that determine housing allocations specific to jurisdictions, including consideration of the housing needs of all income levels. Furthermore, consideration of housing needs of all income levels and subsequent housing allocations must seek to reduce the concentration of lower income households in cities or counties that are impacted by disproportionately high proportions of lower income households.

Numerous criteria must be taken into consideration when determining a jurisdiction’s share of the regional housing need. These criteria include the market demand for housing, employment opportunities, availability of suitable development sites, public facilities, commuting patterns, type and tenure of housing need, and the housing needs of farm workers.

Fresno COG staff developed a written survey of all local jurisdictions to assist it with this task. The survey questions were taken directly from statute. None of the information received in response to the survey was used as a basis for reducing the total housing need established for Fresno County. Information from the survey will be particularly helpful during the negotiation period, should it be necessary, to determine the final distribution of regional housing need among various agencies. A copy of the survey is included in the Appendix.

The State Department of Housing and Community Development (HCD) has several roles in the regional housing needs allocation process. Section 65584 requires HCD to allocate shares of statewide housing need, by income category, to councils of government, including the Council of Fresno County Governments (Fresno COG), and advises councils of government in the preparation of the regional housing needs allocation plan. Councils of government are required to then determine the distribution of the housing need within the region.

While housing elements must reflect the shared responsibility among local governments for accommodating regional housing needs and the housing needs of all economic levels, the actual distribution of housing needs to local jurisdictions represents a planning objective. The State recognizes that the total housing needs identified may exceed available resources and a community’s ability to satisfy these needs and that, in carrying out this responsibility, each local government also has the responsibility

to consider economic, environmental, and fiscal factors and community goals set forth in its general plan. It is important to make progress during the planning period to achieve the housing need, not necessarily that the total housing need be achieved. It is also important to recognize that addressing regional housing needs requires local jurisdictions to cooperate with other local jurisdictions in the region.

Census data from 2000, State Department of Finance (DOF) data, HCD data, and Fresno COG calculations are the basis for all housing projections prepared for Fresno County's 2007 Regional Housing Needs Allocation (RHNA) Plan. The planning period for the Plan extends from January 1, 2006 to June 30, 2013.

STUDY APPROACH

A team of local planning and housing experts, formed to assist staff with this project, met on October 4, 2006, and recommended to the Fresno COG Policy Advisory Committee and Policy Board that the methodology utilized to develop the previous Fresno County 2001 RHNA Plan and even earlier Fresno County 1990 RHNA Plan also be used to develop the Fresno County 2007 RHNA Plan. The recommendation was based on the following methodology attributes:

1. The methodology was successfully used in the development of the 1990 and 2001 RHNA Plans and was acceptable to local jurisdictions in Fresno County and HCD. In addition, the methodology allows for the ability to make manual adjustments to a jurisdiction's allocation of the regional housing construction need. Recent changes to statute require that local jurisdictions be surveyed to gather information regarding local government infrastructure, housing market, and other local conditions that could influence the distribution of the regional housing need. Information from the survey will be particularly helpful during negotiations, if necessary, regarding potential manual adjustments. Negotiations were required and were concluded successfully for both the 1990 and 2001 RHNA Plans.
2. The methodology is acceptable to HCD for use in Fresno County's 2007 RHNA Plan.
3. The methodology is relatively straightforward to understand and implement, an important factor to achieve support for the Plan.
4. The methodology reflects a city-centered and balanced development pattern that is substantially consistent with local agency general plans, including Fresno County's General Plan, adopted on October 3, 2000.

Subsequent to a 60-day public comment period, the Fresno COG Policy Board held a duly noticed public hearing on February 22, 2007. At the conclusion of the public hearing, the Policy Board approved Resolution No. 2007-07 adopting the methodology for use in the development of the Fresno County 2007 Regional Housing Needs Allocation Plan. A copy of the Resolution is included in the appendix.

The Fresno County 2007 RHNA Plan responds to State statute and guidelines by identifying the following:

1. The existing and projected housing needs of the Fresno County region.
2. The housing needs of persons of all income levels within the area significantly affected by a jurisdiction's general plan.

3. The distribution of housing needs to reduce the concentration of lower income households in cities which already have disproportionately high proportions of lower income households.
4. A January 1, 2006 to June 30, 2013 planning time frame (7 ½ years) consistent with the statutory schedule.

The Plan includes the following two major components:

1. Existing Housing Needs - Information in the Plan for the base year January 1, 2006 includes:
 - a. Total households by household income and jurisdictional area
 - b. Vacancies
2. Projected Housing Needs: - Two categories of projected housing need, by jurisdictional area, are included in the Plan:
 - a. Projected households by household income groups for June 30, 2013
 - b. Projected housing construction need for the 7 ½ year period extending from January 1, 2006 to June 30, 2013, derived by the Fresno COG from the household projections with allowances for vacant units and normal market removals

The general process used to develop the Plan is outlined below. The completion of tasks one to seven resulted in the development of the draft Fresno County 2007 Regional Housing Needs Allocation Plan. Tasks eight and nine summarize the review process prior to final Plan approval.

Task One – Assemble Materials and Data

Approach

One of the earliest considerations in the development of the Fresno County 2007 Regional Housing Needs Allocation Plan is the determination of the housing construction need figure for all of Fresno County for the planning period extending from January 1, 2006 to June 30, 2013. The State Department of Housing and Community Development (HCD), in consultation with individual COGs, is required to determine the projected need for housing in each region. This regional housing construction need figure is established for planning purposes and statutes recognize that future housing production may not equal the regional housing construction need. The methodology used by HCD to determine the housing construction need for Fresno County includes projected population and household formation rates (or headship rates), vacancy rates and housing replacement needs. During the consultation phase between Fresno COG and HCD, the housing construction need figure for Fresno County was reduced from HCD's original proposal of 56,762 units to 52,142 units, a reduction of 4,620 units or 8.14%. This reduction occurred because HCD agreed with COG staff analysis that the trend of declining headship rates (i.e. household formation rates) between 1990 and 2000 ought to be continued and applied to projected 2013 population. This resulted in lower household growth (and therefore a lower housing construction need) than projected by HCD, which kept headship rates the same in 2013 as in 2000 (i.e. no decline). This figure assumes a .09 percent annual replacement rate for Fresno County, as identified by HCD. The 52,142 unit figure used in this 2007 RHNA Plan compares to a 34,773 unit figure used in the 2001 RHNA Plan. On December 14, 2006, the Fresno COG Policy Board approved the use of this figure in the development of the 2007 RHNA Plan.

HCD also provided estimates of the percentage of households in each of four income groups; Very Low Income, Other Low Income, Moderate Income, and Above Moderate Income. Income group data are

used in the Plan to determine local jurisdiction shares in the provision of housing for low-income households. The income category allocation is calculated by multiplying total housing construction need by the proportion of households in each income category based on Fresno County Census 2000 median income and income definitions. Income group percentages used in the 2001 RHNA Plan were 25% very low, 17% low, 21% moderate and 37% above-moderate. Percentages used in the 2007 RHNA Plan are, respectively, 23.8%, 16.2%, 18.1%, and 41.9%. A letter, including attachments, from HCD dated September 8, 2006, establishing Fresno County's Regional Housing Needs Determination and an explanation for that determination, including a breakdown of the Regional Housing Needs Determination by income category, is included in the appendix.

Accomplishments

Assembled the following information:

1. 2000 U.S. Census data
 - a. Household income distribution data
 - b. Complete vacant unit data (for sale, for rent, and other vacant, including seasonal and migratory unit data)
2. State Department of Finance yearly estimates of population and households
3. Data for Fresno County identifying housing unit construction and total housing stock

Task Two – Review the Regional Profile

Approach

Fresno COG staff reviewed the demographic, geographic, economic and social characteristics of the cities and county.

Accomplishments

1. Analyzed regional changes in the last six years.
2. Reviewed previous growth assumptions relative to new analysis.

Task Three – Reevaluate Housing Market Areas

Approach

Housing market areas are used throughout the Plan in the gathering, analysis, and presentation of data. For this reason, the boundaries of the market areas are drawn along census tract boundaries. The Fresno County 2001 Regional Housing Needs Allocation Plan divided the Fresno County region into five housing market areas (a reduction from the seven housing market areas used in the earlier 1984 and 1990 RHNA Plans) as follows: Fresno-Clovis Metropolitan Area (FCMA), East Valley, Westside North, Westside South, and Sierra Nevada. These areas were considered to be subregionally significant areas within the County.

It is not mandatory that the 2007 RHNA Plan retain the exact same market areas that were used in the earlier plans. In defining market areas, there are two concepts that must be kept in mind. First, market

areas should not divide developed areas. Second, market areas should define subregions in which there is an interaction between employment opportunities and housing opportunities.

The 2001 RHNA Plan determined that since the development of the 1990 Plan there had been changes in the region that warranted a reevaluation of the market areas. Commuting trips had become generally longer and economic relationships had been formed among Westside cities and Southeast cities, in particular the formation since 1990 of the Five-Cities Economic Development Authority (Parlier, Selma, Fowler, Sanger, and Reedley) and the I-5 Business Development Corridor (Firebaugh, Mendota, San Joaquin, and Kerman). This reevaluation resulted in a decrease in the number of housing market areas from seven to five.

The team of local planning and housing experts formed to assist Fresno COG staff with this project reviewed the market areas used in the 2001 RHNA Plan and recommended their use in the 2007 RHNA Plan. The team could not identify any significant trends since the 2001 Plan that would result in a change in the number of or reconfiguration of housing market areas. Indeed, the economic relationships among cities that had formed during the 1990s were still intact and commutes remained long. On February 22, 2007, the COG Board approved Resolution No. 2007-07 affirming the validity of the five market areas utilized in the development of the 2001 RHNA Plan for use in the 2007 RHNA Plan.

Regional Market Areas

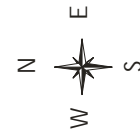
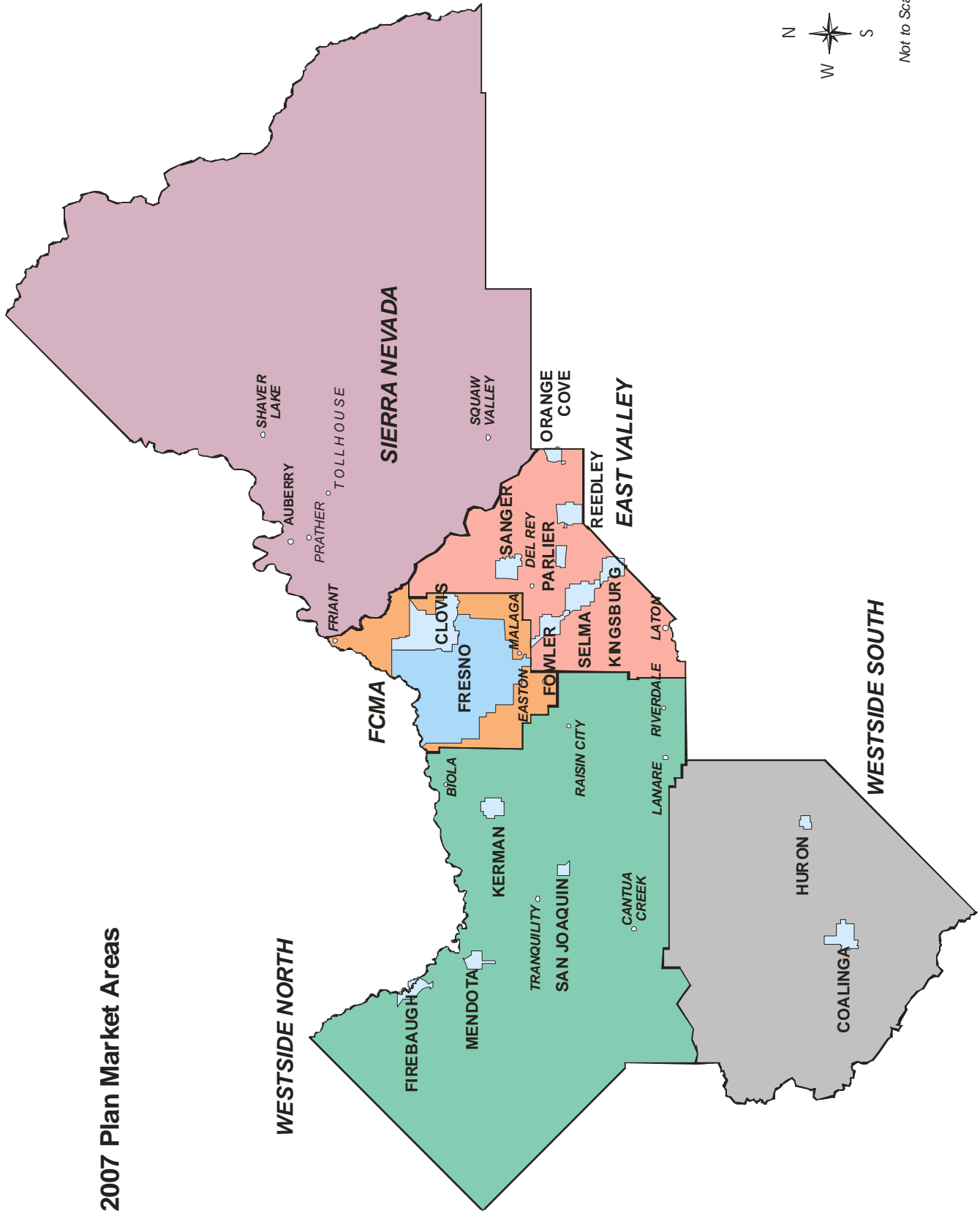
1. **Fresno-Clovis Metropolitan Area (FCMA):** The FCMA market area is comprised of the cities of Fresno and Clovis; the unincorporated communities of Easton and Friant; several unincorporated neighborhoods including Fig Garden, Malaga, and Sunnyside; and, remaining unincorporated area. The geographic boundary of the FCMA generally extends from the San Joaquin River on the north, Grantland Avenue on the west, McCall Avenue on the east and South Avenue on the south. As the largest metropolitan area in the San Joaquin Valley, the FCMA is a significant center of employment and residential opportunities.
2. **Westside North:** The Westside North market area is comprised of the cities of Kerman, Firebaugh, Mendota, and San Joaquin; the unincorporated communities of Tranquility, Biola, Caruthers, Lanare, Laton and Riverdale; and, remaining unincorporated area. The area extends from the eastern slope of the Coast Range to the western boundary of the FCMA and, south of the FCMA, to a point just east of and parallel to SR-41. The Valley portion is largely agricultural while the Coast Range portion is used for cattle grazing, mining, recreation, and wildlife habitat.
3. **Westside South:** The Westside South market area is comprised of the cities of Coalinga and Huron and unincorporated area. The area extends from the eastern slope of the Coast Range to the Fresno and Kings Counties boundary. The primary economic activities of this market area are similar to those in the Westside North market area.
4. **East Valley:** The East Valley market area is comprised of the cities of Orange Cove, Parlier, Reedley, Sanger, Fowler, Kingsburg and Selma; the unincorporated community of Del Rey; and, remaining unincorporated area. The area extends southeastwardly from the FCMA between a point just east of and parallel to SR-41 and the Friant-Kern Canal. The economic base of this market area is agriculture, although commercial and industrial activities have become increasingly important.
5. **Sierra Nevada:** The Sierra Nevada market area is comprised of the unincorporated communities of Auberry, Big Creek and Shaver Lake and the remaining unincorporated area.

There are no cities in this market area. The area extends easterly of the Friant-Kern Canal and comprises the western slope of the Sierra Nevada Mountain Range. The unincorporated communities function as service centers for the various recreational sites in the area and the farming, cattle grazing, and lumbering activities that occur.

Accomplishments

1. Analyzed demographic and economic changes of market areas.
2. Reassessed market area boundaries.

2007 Plan Market Areas



Not to Scale

Task 4 – Determine Low-Income Impacted Jurisdictions

Approach

Utilizing the 2000 U.S. Census and State Department of Finance population estimates, projections, and other data, the Fresno COG calculated the number and percentage of households in each of the four income groups. The sum of the calculations for each of the local jurisdictions is controlled by the regional total. The Plan groups the households of each jurisdiction into the four household income groups defined by Section 6932 of the California Administrative Code. The following is a brief description of each of these income groups.

<u>Very Low Income</u>	Income not exceeding 50 percent of the median family income of the County
<u>Other Low Income</u>	Income between 50 percent and 80 percent of the median family income of the County
<u>Moderate Income</u>	Income between 80 percent and 120 percent of the median family income of the County
<u>Above Moderate Income</u>	Income above 120 percent of the median family income of the County

The following method was utilized to arrive at the percentage of households in each income group in each local jurisdiction:

1. The maximum county income associated with each income group was determined.
2. Maximum incomes were used to determine the number and percent of each jurisdiction's households whose income is less than or equal to the maximum income of each income group.
3. Each city's households and each market area's unincorporated area households were aggregated into the four income groups.

Accomplishments

1. Utilized 2000 U.S. Census income data to reflect new income group estimates provided by the Department of Housing and Community Development.
2. Calculated the number and percentage of households by income group for each jurisdiction.
3. Reviewed each jurisdiction's share of households by income group to identify jurisdictions with high percentages of low-income households.

Task 5 – Allocate Household Growth

Approach

U. S. Census data for 2000, State Department of Finance population projections, and State Department of Housing and Community Development housing factors are the basis for all housing estimates and projections prepared for the 2007 RHNA Plan. January 1, 2006 is the beginning date of the Plan for all housing projections. June 30, 2013 is the ending date of the Plan. Household estimates are prepared for

both of these dates by applying 2000 housing characteristics to the household estimates using a trend line method. This approach involves determining the percentage of past regional household growth which is accounted for by each jurisdiction and applying these percentages to the projected household growth for the region.

Prior to 1990 there had occurred an historic decline in the population of the unincorporated area of Fresno County, with regard to both the overall ratio of the unincorporated to incorporated population and a real decline in actual numbers. For example, the 1990 RHNA Plan indicated the number of unincorporated households within the FCMA market area actually declined by 11,733 households between 1980 and 1989, or from 27.42 percent of total FCMA market area households in 1980 to 14.75 percent in 1989. And while the percentage change during the same period for the other market areas was generally positive (the Westside South market area being the exception), it was less than ½ of 1 percent.

Two factors in particular contributed to this declining unincorporated population: County policy relative to urban development in unincorporated areas and aggressive city annexation activities, particularly annexation of inhabited areas by the City of Fresno, between 1980 and 1989.

The County first adopted a goal in 1976 that urban development within a city's sphere of influence is to be directed to that city. In March of 1983, the cities of Fresno and Clovis, and the County of Fresno adopted a joint resolution reaffirming this goal. The goal has since been reaffirmed, most recently in the County's current General Plan "to ensure that all development in city fringe areas is well planned and adequately served by necessary public facilities and infrastructure and furthers countywide economic development goals."

In the 1990 RHNA Plan, the growth trend for market areas and communities from 1980 to 1989 was applied to the planning cycle from 1989 to 1996, except for the FCMA market area. In order to slow the overall estimate of the continued decline of unincorporated County households as predicted by the trend line method, a manual adjustment to the FCMA unincorporated area was included in the estimates. This manual adjustment was based on a determination that "institutional barriers" were expected to reduce significantly the rate of inhabited annexation activity during the 1989-1996 planning period. This determination turned out to be correct as the number of unincorporated households within the FCMA market area in 1996, as projected in the 1990 RHNA Plan with the manual adjustment, was similar to the actual number.

The 2001 RHNA Plan, unlike the 1990 RHNA Plan, did not initially provide for a manual adjustment to the FCMA unincorporated households. The reason for this was that the extent of inhabited annexation activity between January 1, 2000 and June 30, 2007 was expected to remain pretty much as it was between 1990 and 2000, which is to say virtually nonexistent. Nevertheless, within the FCMA market area and within the County as a whole, the percentage of unincorporated households compared to total market area and total County households, was projected to continue to decline, although only slightly, during the 7 ½ year planning period, while the actual number of unincorporated households was projected to increase somewhat.

Table 1
Population Estimates and Projections by Jurisdiction
2000-2013

	April 1, 2000	January 1, 2006	June 30, 2013
Clovis	68,516	89,924	111,276
Coalinga	15,798	17,147	18,492
Firebaugh	5,743	6,710	7,674
Fowler	4,046	4,855	5,662
Fresno	427,652	471,481	515,196
Huron	6,310	7,344	8,375
Kerman	8,548	12,633	16,707
Kingsburg	9,231	11,246	13,256
Mendota	7,890	8,777	9,662
Orange Cove	7,722	9,639	11,551
Parlier	11,145	12,895	14,640
Reedley	20,756	23,341	25,919
Sanger	18,931	23,322	27,702
San Joaquin	3,270	3,746	4,221
Selma	19,444	22,931	26,409
Unincorp.	164,405	173,526	182,623
Total County	799,407	899,517	999,366

Sources:

1. 2000 estimates are from the 2000 U.S. Census
2. 2006 estimates for each jurisdiction were prepared by the State of California Department of Finance.
3. 2013 projection for the County was prepared by the State of California Department of Finance, and assume the same jurisdictional shares of population growth for 2006-2013 as occurred for 2000-06.

Accomplishments

1. Evaluated factors that might disrupt the validity of the trend line method for determining growth estimates.
2. Determined the total number of households expected to be generated by each jurisdiction.
3. Developed statistical tables related to this task.

Task 6 – Allocate Households by Income Group

Approach

Section 65584 of the Government Code states that the distribution of regional housing needs shall seek to reduce the concentration of lower-income households in cities that are impacted by disproportionately

high proportions of lower-income households. This, therefore, is an important objective of the 2007 RHNA Plan.

Accomplishments

1. Distributed the Countywide housing need to each income group in each jurisdiction in each market area.
2. Reviewed distribution to insure that no jurisdiction with a relatively high proportion of low-income housing has its ratio of low-income housing increased further.
3. Reviewed jurisdictional and market area allocations to insure that the sum of the allocations for each income group is equal to the regional total for each income group.

Task 7 – Calculate New Housing Construction Need by Jurisdiction

Approach

New housing construction needed to provide for the anticipated growth in households must be calculated for each local jurisdiction and market area for the planning period extending from January 1, 2006 to July 1, 2013. Factors utilized in the calculations include existing housing units, projected number of households, vacancy factors, and housing removals.

Accomplishments

1. Reviewed, modified, and utilized State recommended formula.
2. Calculated new construction need for each jurisdiction and market area.
3. Updated tables related to construction need.

Task 8 – Initiate Local Revision Process

Approach

The receipt by each local government in Fresno County of the distribution of the draft allocation of regional housing needs (Draft 2007 Fresno County Regional Housing Needs Allocation Plan) began the 60-day period whereby a local government may request from the Fresno COG a revision of its share of the regional housing need. A request for a revised share shall be made in accordance with the factors described in paragraphs (1) to (9), inclusive, of subdivision (d) of Section 65584.04. Further, the request shall be based upon comparable data available for all affected jurisdictions and accepted planning methodology, and supported by adequate documentation. The draft allocation was also submitted to HCD for its review of the consistency between the existing and projected housing need identified in the Plan and the statewide housing need.

Accomplishments

1. Distribution of the draft allocation of regional housing needs (Draft 2007 RHNA Plan) to local governments for the purpose of initiating the 60-day revision period.

Task 9 – Approve the Final 2007 Fresno County Regional Housing Needs Allocation Plan

Approach

Within 60 days after a city(ies) or the county requested from the Fresno COG a revision of its share of the regional housing need, the Fresno COG shall accept the proposed revision, modify its earlier determination, or indicate, based upon the information and methodology described in Section 65584.04, why the proposed revision is inconsistent with the regional housing need.

Accomplishments

1. Public Hearing.
2. Approval of the 2007 Fresno County Regional Housing Needs Allocation Plan.

FARMWORKER HOUSING NEEDS

Characteristics of Farmworkers

Government Code Section 65584 requires the regional housing needs allocation plan to consider the housing needs of farmworkers. However, any discussion of farmworkers and farmworkers housing must appropriately begin with an understanding of who farmworkers are and the characteristics they share in common. Unfortunately, there is a serious deficiency of data about the farmworker population including that this population is generally undercounted by the U.S. Census. For example, a number of farmworkers live in unofficial dwellings, which are often missed by the Census Bureau. A recent health study in the City of Parlier in Fresno County indicated about 28 percent of farmworkers were not counted by the U.S. Census because they lived in unofficial dwellings.

Other characteristics of migrant and seasonal farmworkers also make it difficult to collect data. They often do not have a fixed address and work intermittently in various agricultural and non-agricultural occupations during a single year, with only casual employer-employee links. Many live in rural, often remote areas. Many have limited English-speaking abilities, relatively low educational levels and are unfamiliar with and even distrustful of government agencies and agents, including those who work for the Census Bureau. Inaccurate data makes it difficult to determine the seriousness of housing and other needs and the types of services required by this population.

While current information on farmworkers is limited, data from the census, including the March 1997 Current Population Survey, reveals the following. Farmworkers numbered 342,102 in California as of March, 1997, are overwhelmingly Latinos (78 percent), and are mostly males (72 percent). Approximately 55 percent of the state's agricultural workers were employed in the San Joaquin Valley, which includes Fresno County, in 1996. Farmworkers have the lowest family income of any occupation surveyed by the Census Bureau and the highest poverty rate of any surveyed occupation. Farmworkers have the lowest educational attainment and are second from the lowest, after the private housekeeper occupation, in home ownership. Farmworkers have one of the lowest rates of health insurance coverage and are overwhelmingly non-citizens (including legal residents, workers with a permit, or undocumented).

These highlights are more likely to reflect the characteristics of agricultural workers who spend most of the year in the United States. However, as we know, every year around April waves of seasonal agricultural workers come to California. The March Current Population Survey does not wholly capture this population due to the time of year it is conducted. The Average Annual Wage and Salary

Employment in California Agriculture was 408,000 in the year 2000, but the total number of individuals employed for wages on California farms is about twice this level, i.e. 800,000 to 900,000, based on late 1980s studies of counts of the SSNs reported by farm employers to the Economic Development Department.

California is the nation's largest agricultural state, producing more than 250 different crops valued at nearly \$30 billion. Fresno County is the number one county in the State and Nation in terms of value of agricultural production. California and Fresno farmers have been changing their crops to respond to consumer demand, producing more fresh vegetables, fruits and nuts. These high value-added crops require more labor. Also, there has been an ongoing change from many smaller farms to fewer bigger farms with the ability to provide extended periods of work for farmworkers. These trends along with others are interacting to mean that more farmworkers than ever are working in California and many are working for longer periods of time in one area, some as residents of that area.

Farmworker Housing

Two main factors lie behind the worsening housing shortage for farmworkers: there are more farm workers and many farmers have ceased to provide housing. A shrinking supply with an increasing demand has led to higher prices in rural areas, resulting in housing costs that are high relative to farmworker income. This has led to significant overpaying for housing and overcrowding of housing. The farm work force is changing to include more solo male and unauthorized migrants. Most aim to maximize their savings and are unable or unwilling to pay prevailing rents for temporary housing. Since most farmers do not provide housing, and many publicly owned or managed facilities are restricted to families, the newest and neediest workers usually seek housing in regular rental markets, where several share a housing unit, and some sleep in cars and other unconventional places. Furthermore, about 600,000 unauthorized Mexican men were legalized in 1987-88. During the 1990s, many brought their families to the U.S. and many found nonfarm jobs. Finding housing for these often large families from rural Mexico is difficult. The families are often larger than average and rent housing, but rental units tend to be smaller than average.

The amount of farmworker housing registered with the state has declined dramatically in the last two decades. In 1955, growers registered more than 9,000 facilities to house migrant and seasonal workers. By 1982, only 1,414 employer-owned camps were registered. In 1994, only 900 camps were registered, with a capacity of 21,310 workers. In 1998, according to the Department of Housing and Community Development, there were only 500 farm labor camps registered. Not surprisingly, a 1995 study by the University of California at Davis estimated that 250,000 farmworkers and their family members had inadequate housing, including 90,000 migrant workers and over 160,000 non-migrant seasonal farmworkers. The housing shortage was so severe that many workers were found packed 10 or 12 into trailers and sleeping in garages, tool sheds, caves, fields and parking lots. Consequently, the major farmworker housing policy issue has shifted from regulating employer-provided housing to direct provision and/or management of farm worker housing.

The Fresno Bee on August 18, 1996 ran a lengthy article on the sharp drop in farm farmworker housing in the San Joaquin Valley, the eight county area centered on Fresno that employs half of the California's farmworkers. The article noted neighbors complain about (or sometimes simply fear) workers' behavior, noise, and traffic. Government inspections, regular and deferred maintenance, calls from or regarding tenants during their non-work hours, and liability issues all represent unwanted concerns and cost for growers. Housing facilities that cannot withstand heavy use or are not vandal resistant may be cited for regulatory violations that carry substantial penalties. Even minor violations of the housing code, such as torn window screens, can result in large fines. Consequently, instead of providing workers with on-farm housing subject to federal and state inspection, many farmers are razing their farmworker housing.

As a result, most farmworkers crowd into urban dwellings, including backyard structures and garages, which results in widespread overcrowding, particularly during those times of the year when farmworkers are most in demand. In many cases, workers today spend 25 to 35 percent of their wages on housing and rides to work. Farmworker cities in rural California are growing twice as fast as the state's population, as newly-legalized farm workers bring their families to the U.S. Many of these "overgrown labor camps" are over 50 percent Latino, and some are over 90 percent. It is important to note, however, that some growers and labor contractors have shown renewed interest in housing as an important factor in their ability to attract and retain their best workers.

Many San Joaquin Valley towns have become farmworker service centers, with local residents, for a fee, providing everything from housing and meals to forged work documents, rides to the fields, and check cashing services. In the city of Parlier in Fresno County, the mayor has said that the population expands significantly each summer as workers arrive from Mexico. Migrants rely on friends, relatives or labor contractors to arrange housing. Oftentimes, with so many men sharing apartments, two to four times the normal rent is generated for the landlord. Furthermore, the shortage of temporary housing for farmworkers in rural areas encourages many to commute long distances from the housing that they find. These long commutes can contribute to the air quality problems that exist in Fresno County and the San Joaquin Valley.

The Department of Housing and Community Development reviewed the status of farmworker housing programs in the late 1980s. Five of the thirteen findings from that investigation are as follows:

- A majority of migrant farmworkers who do not live in government-sponsored labor camps live in seriously substandard conditions.
- Substandard housing conditions exist in areas with significant seasonal agricultural production.
- Housing conditions are a major problem for both single migrant workers and migrant families.
- Poor housing hurts migrant children's health, education, and general welfare.
- Local officials vary in their support for housing migrant families.

Employment on California farms has been increasing, as noted above, and shifting from farmers hiring workers themselves to having farm services firms such as farm labor contractors bring workers to farms. Currently, approximately half of the hired worker employment is by farm services firms. This suggests that farm services firms, not just farm operators, should be involved in farm worker housing programs.

Fresno County Farmworkers, Overpayment, and Overcrowding

One indicator of housing cost and affordability is the 40th percentile rent for an area. For example, the HUD Fair Market Rent for the Section 8 Housing Assistance Payments Program of \$517 a month in Fresno County in 2000 means that 40 percent "of standard quality rental housing units" in Fresno County rent for less than \$524 a month, and 60 percent rent for more than \$524 a month. A farmworker family in Fresno County would have to earn \$1,723 a month to spend 30 percent of earnings on housing and afford the Fair Market Rent. However, median family income for farmworker households is \$800 to \$1,200 a month.

As noted earlier, farmworkers have the lowest family income of any occupation surveyed by the Census Bureau and are second from the lowest, after the private housekeeper occupation, in home ownership. Substantial numbers of farmworkers and other low-paid workers are overpaying for housing in Fresno County, particularly the lower one is on the income scale. The higher a household's income, the less likelihood it will be overpaying for housing.

The Housing Authorities of the City and County of Fresno manage 130 housing units for migrant farm workers in Parlier. The complex is owned by the State of California, Office of Migrant Services. In addition, the Housing Authority owns and manages a 64 unit migrant housing complex in Firebaugh. Both complexes are occupied six months out of the year, from April through October. Migrant farm worker families who want to rent a unit in Firebaugh or Parlier must demonstrate that at least half of their earned income is farm related, they must show evidence of a permanent residence at least 50 miles from the work site, and they must be legal residents of the United States. The cost of managing and maintaining both complexes is subsidized by the State of California, Office of Migrant Services.

Within Fresno County there are 4,630 federally-assisted multifamily housing units, of which 3,156 are Section 8. Of the 4,630 units, 2,460 are units at risk, while 1,401 are low risk of conversion to market rate housing.

The Migrant Health Program periodically seeks to obtain updated information about migrant and seasonal farmworkers, including where they are working and living and what crops are being harvested, in order to more appropriately target limited resources to areas of greatest migrant and seasonal farmworker need. The Migrant and Seasonal Farmworker Enumeration Profiles Final Study for California dated September, 2000 indicates that in Fresno County there were an estimated 113,741 migrant and seasonal farmworkers. Of this number, 52,662 were migrant farmworkers and 61,079 were seasonal farmworkers. The Study further estimates there were 19,353 non-farmworkers in migrant households and 69,309 non-farmworkers in seasonal households, for a total figure of 202,404 migrant and seasonal farmworkers and non-farmworkers in Fresno County.

In this report, a seasonal farmworker is defined as an individual whose principal employment (51 percent of time) is in agriculture on a seasonal basis, who has been so employed within the last twenty-four months. A migrant farmworker meets the same definition but establishes for the purposes of such employment a temporary abode. Included in the scope of the study are individuals engaged in field and orchard agriculture; packing and sorting procedures in food processing; horticultural specialties (including nursery operations, greenhouse activities and crops grown under cover); and reforestation. Excluded from the study are those working with livestock, poultry, and fisheries.

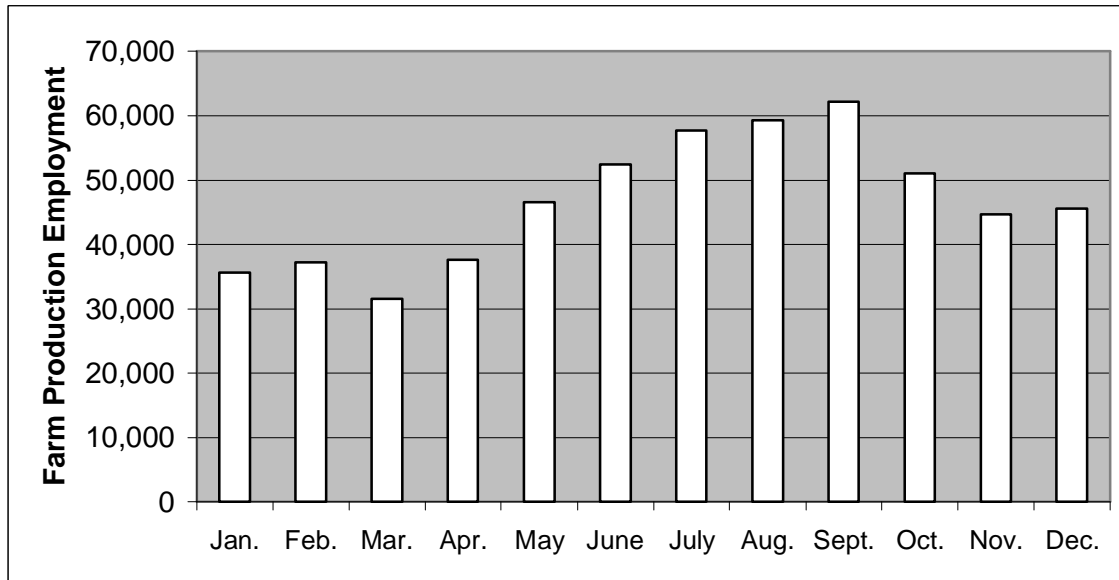
The same Study has also calculated the number of farmworkers that work on a year-round as well as seasonal basis, both for the state as a whole and for individual counties. The Study indicates this figure to be 259,665 farmworkers for Fresno County.

Fresno County is certainly sensitive to the issue of farmworker housing and to the issue of affordable housing in general. Recently, the County of Fresno utilized focus groups to identify and discuss issues of importance for its new general plan. Although not one of the major themes developed from these focus groups, the issue of farmworker housing was raised. Several of the focus groups favored increased availability of farmworker housing, pointing out that many agricultural workers live in crowded conditions in towns distant from the fields in which they work. Other housing issues, particularly the need for affordable housing, were also raised. The County's new general plan was adopted on October 3, 2000.

According to the State of California Employment Development Department (EDD), the number of individuals in Fresno County with an occupation in farm production was 46,800 in 2006. This was 13.4 percent of County workers in all industries. Farm production is the production of crops, plants, vines, trees (excluding forestry), and livestock. Farm production does not include farm services such as soil preparation, crop services, veterinary services, or farm labor and management services. Seasonal and migrant farmworkers are most closely associated with the farm production classification.

The number of employed farmworkers in the County varies from month to month. According to the EDD, the number of farmworkers in 2006 was greatest in September and least in March. The following chart shows the monthly farm production employment for the period January 2006 to December 2006.

Fresno County Farm Production* Employment Year 2006 by Month

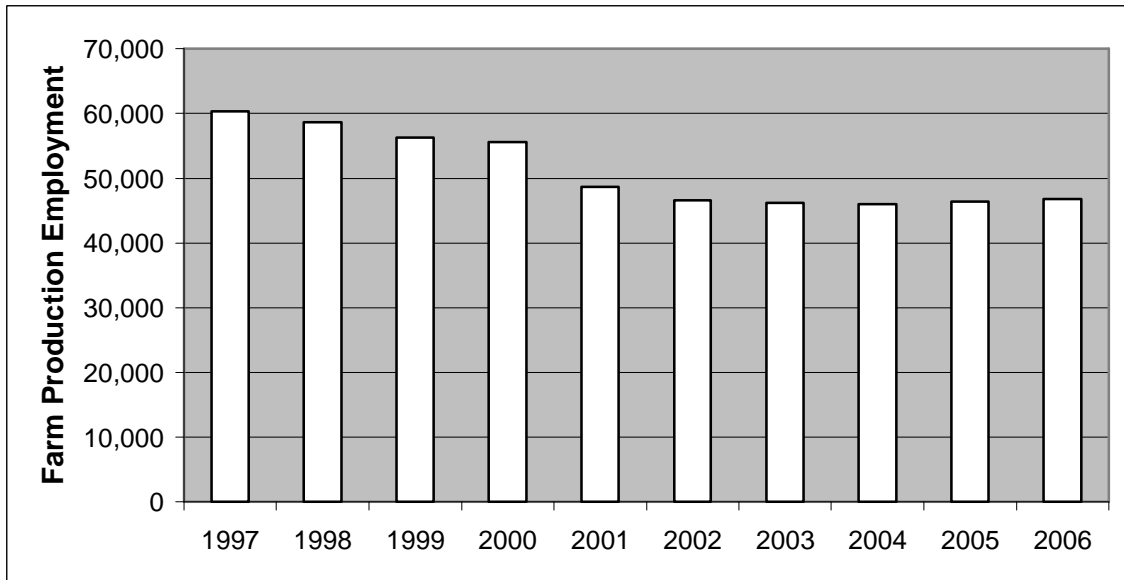


* Farm production is the production of crops, plants, vines, and trees (excluding forestry), and livestock. Farm production does not include farm services such as soil preparation, crop services, veterinary services, or farm labor management services. Seasonal and migrant farmworkers are most closely associated with the farm production classification.

Source: State of California Employment Development Department

In addition to seasonal variability, Fresno County farm production employment also varies on a year to year basis. According to the EDD, during the years 1997 through 2006, average annual farm production employment ranged from a low of 46,000 in 2004 to a high of 60,300 in 1997. This is a difference of 14,300 workers. The average annual farm production employment for this period was 51,160. The following graph illustrates the annual variability of farm production employment for the years 1997 through 2006. The graph clearly illustrates the consistent decline in farm employment from 1997 through 2002, and the stabilization of farm employment from 2002 to 2006.

Fresno County Farm Production* Employment Years 1997-2006



* Farm production is the production of crops, plants, vines, and trees (excluding forestry), and livestock. Farm production does not include farm services such as soil preparation, crop services, veterinary services, or farm labor management services. Seasonal and migrant farmworkers are most closely associated with the farm production classification.

Source: State of California Employment Development Department

Farmworkers are not distributed equally throughout the County. According to the 2000 U.S. Census, the highest concentration of farmworkers was in San Joaquin where 56.0 percent of the labor force was identified as being in farming, forestry, and fishing occupations. Since there is a relatively small forestry industry in Fresno County, and an even smaller fishing industry, these workers in Fresno County cities are assumed to be farmworkers. This is clearly the case for those cities with the highest concentration of farmworkers, including San Joaquin, Huron, Mendota, Orange Cove, Parlier, and Firebaugh. All of these cities are located on the Valley floor a considerable distance, with the possible exception of Orange Cove, from forest resources.

The following table shows the ranking of cities in Fresno County by percent of workers in farming in 2000:

Ranking of Cities in Fresno County
by Percent of Workers in Farming*
Year 2000

Rank	Cities in Fresno County	Percent of Workers in Farming*
1	San Joaquin	56.0%
2	Huron	49.2%
3	Mendota	44.1%
4	Orange Cove	39.9%
5	Parlier	28.6%
6	Firebaugh	25.6%
7	Kerman	21.7%
8	Reedley	18.5%
9	Sanger	13.1%
10	Coalinga	12.3%
11	Selma	11.9%
12	Fowler	6.8%
13	Kingsburg	5.1%
14	Fresno	3.5%
15	Clovis	2.0%

* Includes workers in the farming, forestry, and fisheries classifications. There are a minimal number of Fresno County workers in forestry and fisheries.

Source: 2000 U.S. Census

Overcrowding of housing and overpaying for housing will naturally be more prevalent in those cities that have a higher percentage of workers in farming.

HCD administers more than twenty programs that award loans and grants to local public agencies, private nonprofit and for-profit housing developers, and service providers every year. This money supports the construction, acquisition, rehabilitation and preservation of affordable rental and ownership housing, child care facilities, homeless shelters and transitional housing, public facilities and infrastructure, and the development of jobs for low income workers. The HCD website, www.hcd.ca.gov, includes a Funds Available Calendar that lists current Notices of Funding Availability for HCD's loan and grant programs, including due dates for applications, award dates, and other related information. The HCD website also provides information about non-HCD funding sources, including over 200 State, federal and private sources of assistance by type and geographical availability. Many of these programs and funding sources can be utilized to provide housing for farmworkers.

Chapter 2

HOUSING NEEDS DETERMINATION

The Fresno County 2007 Regional Housing Needs Allocation Plan determines housing needs in Fresno County for the planning period extending from January 1, 2006 to June 30, 2013 and provides a general measure of each local jurisdiction's responsibility for the provision of housing to meet those needs. This Chapter addresses the major components of the Plan, including household projections, basic construction need, the projected housing demand for all income levels, and the allocation of housing need to individual cities and the County unincorporated area.

1. As discussed in Chapter 1, regional household estimates for the January 1, 2006 beginning date and June 30, 2013 ending date of the Plan were calculated by the Fresno COG utilizing State Department of Finance population figures, population to housing unit ratios, and occupancy rate figures for Fresno County. Table 2 provides this information.

Table 2
Population and Household Estimates and Projections
January 1, 2006 - June 30, 2013

Date	Population	Households
Jan. 1, 2006	899,517	278,195
June 30, 2013	999,366	328,273

Source: State of California Department of Finance

2. Table 3 provides the estimated number of regional households in each of the four income groups, for both the beginning date and the ending date of the Plan. The figures are obtained by multiplying the total number of households in columns 2 and 4 (from Table 2) by the percentage allocations in columns 3 and 5 (from HCD). The resulting figures are posted to the corresponding income group in columns 2 and 4. Column 6 provides the growth in households, by income group, for the 7 ½ year planning period.

Table 3
Household Projections by Income Group
January 1, 2006 - June 30, 2013

Income Group	Jan. 1, 2006		June 30, 2013		Change Jan. 1, 2006-June 30, 2013	
	Number ¹	Percent ²	Number ²	Percent ²	Number	Percent
Very Low	66,044	23.74%	77,933	23.74%	11,889	23.74%
Low	45,207	16.25%	53,344	16.25%	8,138	16.25%
Moderate	50,337	18.09%	59,398	18.09%	9,061	18.09%
Above Moderate	116,608	41.92%	137,598	41.92%	20,991	41.92%
Total	278,195	100.0%	328,273	100.0%	50,078	100.0%

Sources:

¹ State of California Department of Finance

² State of California Department of Housing and Community Development

- Table 4 provides housing unit and household estimates, by jurisdiction, for the January 1, 2006 beginning date of the Plan. Households are occupied housing units. Data in this table are from Department of Finance housing unit, household, and vacancy rate information by jurisdiction for January 1, 2006.

Table 4
Household and Housing Unit Estimations by Jurisdiction
January 1, 2006

City	Housing Units	Households	Percent Vacant
Clovis	32,458	31,301	3.56%
Coalinga	3,988	3,631	8.95%
Firebaugh	1,806	1,620	10.30%
Fowler	1,519	1,478	2.70%
Fresno	160,446	150,815	6.00%
Huron	1,614	1,574	2.48%
Kerman	3,555	3,450	2.95%
Kingsburg	4,023	3,866	3.90%
Mendota	2,039	1,983	2.75%
Orange Cove	2,153	2,064	4.13%
Parlier	2,990	2,767	7.46%
Reedley	6,570	6,338	3.53%
Sanger	6,527	6,285	3.71%
San Joaquin	822	787	4.26%
Selma	6,701	6,449	3.76%
Incorporated Total	237,211	224,408	5.40%
Unincorporated Total	60,197	53,787	10.65%
County Total	297,408	278,195	6.46%

Source: State of California Department of Finance

4. Table 5 provides the estimated basic construction need for the region, by income group, for the 7 ½ year planning period. The increase in housing units is calculated by first subtracting the number of housing units at the beginning date of the Plan from the housing units at the ending date of the Plan. Next, the housing unit replacement need is calculated using the 0.09 percent annual rate provided by HCD. These two figures are added together and then allocated by income group in accordance with HCD percentage shares. The results are posted to column 3.

Table 5
Basic Construction Need
January 1, 2006 - June 30, 2013

Housing Unit Need by Component:

Household Growth	50,078 ¹
From 278,195 households on Jan. 1, 2006 to 328,273 households on June 30, 2013.	
Homeowner Households	28,294 ²
HCD assumes the 2000 Census proportion of owner-occupied rate of 56.6% remains the same throughout the projection period.	
Homeowner Household Vacancy Allowance	509 ²
HCD assumes a vacancy rate of 1.8% for homeowner households.	
Renter Households	21,784 ²
HCD assumes the 2000 Census proportion of renter-occupied rate of 43.5% remains the same throughout the projection period.	
Renter Household Vacancy Allowance	1,089 ²
HCD assumes a vacancy rate of 5.0% for renter households.	
Subtotal - Household Growth with Vacancy Allowance	51,676 ²
Replacement allowance	
HCD assumes a replacement rate for demolition of .9%	
	466 ²
Total Basic Housing Construction Need	52,142

Housing Unit Need by Income Groups:

Very Low	23.74% ²	12,379
Low	16.25% ²	8,473
Moderate	18.09% ²	9,434
Above Moderate	41.92% ²	21,856
Total	100.0%	52,142

Sources:

¹ State of California Department of Finance

² State of California Department of Housing and Community Development

PROJECTED HOUSEHOLDS PER JURISDICTION AND INCOME GROUP

Table 15 is a table of primary importance in the Plan. It provides, by jurisdiction and market area, the estimated number of households by income group for the January 1, 2006 beginning date of the Plan and the projected number of households by income group for the July 1, 2013 ending date of the Plan. This information is crucial to the later determination of the projected construction need for each jurisdiction during the planning period. Preparation of Table 15 requires numerous steps to be taken, including the development of several intervening tables.

1. List the market areas identified in Task 3 of Chapter 1 in column 1 of Table 15. List for each market area, cities, unincorporated, and (market area) total in column 2. List the four income groups (Very Low, Low, Moderate, and Above Moderate) and a total category for each city, unincorporated area, and (market area) total within each market area in column 3.
2. Post in column 4 of Table 15 the January 1, 2006 beginning date number of total households for each city, the County total incorporated area total, the County total unincorporated area total, and the County total. This information is from Table 4.
3. Calculate the January 1, 2006 beginning year income group percentages for each jurisdiction and post to column 5 in Table 15. The basis for determining the percentage of households in each income group for each jurisdiction is the income group estimates prepared by the Department of Housing and Community for January 1, 2006 total County households. The methodology first identifies the maximum County income associated with each income group. These maximum incomes are then used to determine the number and percent of each jurisdiction's households whose income is less than or equal to the maximum income for each income group. Because 2006 income information is not available, Fresno COG must rely on 2000 U.S. Census income information.
4. Tables 6,8,9 and 10 are derived from 2000 U.S. Census sample data because 2000 U.S. Census 100% data does not contain any income data. The source of the sample data is "2000 U.S. Census SF3 sample data." Household data for the year 2000 in Tables 11 and 13 is from 2000 U.S. Census 100% data.
 - a. Table 6 provides the number of households for each market area, by census income group, utilizing 2000 U.S. Census income information.

Table 6
2000 Number of Households Per Market Area
Per Census Income Group

Source: 2000 U.S. Census

Market Area	Less than \$10,000	\$10,000 to \$14,999	\$15,000 to \$19,999	\$20,000 to \$24,999	\$25,000 to \$29,999	\$30,000 to \$34,999
FCMA	23,698	14,762	14,792	14,789	13,341	13,304
East Valley	3,883	2,867	3,080	2,918	2,828	2,585
Westside North	2,095	1,194	1,493	1,746	1,334	1,270
Westside South	710	512	401	469	483	470
Sierra Nevada	534	346	407	398	360	458
Fresno County	30,920	19,681	20,173	20,320	18,346	18,087

Market Area	\$35,000 to \$39,999	\$40,000 to \$44,999	\$45,000 to \$49,999	\$50,000 to \$59,999	\$60,000 to \$74,999	\$75,000 to \$99,999
FCMA	10,992	10,099	8,771	15,403	17,179	15,741
East Valley	2,364	2,121	1,845	2,899	3,098	2,662
Westside North	909	892	651	962	1,053	965
Westside South	363	376	304	469	437	439
Sierra Nevada	368	300	342	711	667	604
Fresno County	14,996	13,788	11,913	20,444	22,434	20,411

Market Area	\$100,000 to \$124,999	\$125,000 to \$149,999	\$150,000 to \$199,999	\$200,000 or more	Total
FCMA	7,803	3,407	2,884	3,162	190,127
East Valley	1,209	657	362	450	35,828
Westside North	250	150	122	202	15,288
Westside South	163	56	38	53	5,743
Sierra Nevada	473	152	111	87	6,318
Fresno County	9,898	4,422	3,517	3,954	253,304

As Table 6 indicates, the U.S. Census divides households into 16 income groups, based on increments of household income. The 2007 RHNA Plan, however, requires the division of households into the four income groups discussed earlier: Very Low (23.74% of all households); Low (16.25% of all households); Moderate (18.09% of all households); and Above Moderate (41.92% of all households).

- b. A formula was developed to convert data from the 16 income groups listed in the 2000 U.S. Census into the four income groups required by the Plan. The basic purpose of the formula is to determine the household income of the last, or “nth,” household within each of the four income groups required by the Plan. The “nth” household is the cut-off household for the income group category. Any household with an income above the “nth” household is allocated to the next income category.

Table 7 presents the formula that provides for the conversion of the 2000 U.S. Census income groups into the Plan income groups (and indicates the actual dollar interval separating the Plan income groups), for total County households. An important assumption in Table 7 is that households are assumed to be distributed equally over the 2000 U.S. Census income intervals.

- c. Application of the formula developed in Table 7 to information contained in Table 6 for each market area provides for the determination of the number and percentage of households, by Plan income group, within each market area in 2000. For example, the

number and percentage of very low income households in the FCMA market area is determined by adding the total number of FCMA households, from Table 6, within the 2000 U.S. Census income categories less than \$10,000 (23,698 households) and \$10,000 to \$14,999 (14,762 households). To this figure is then added the partial number of households within the 2000 U.S. Census income category \$15,000 to \$19,999, determined by applying the formula developed in Table 7 (47.2612% of the total households within this income category are very low income households) to the total number of FCMA households within this income category (14,792 households). This calculation results in 6,991 of the households within the \$15,000 to \$19,999 income category being very low income households. The total number of very low income households within the FCMA market area is, therefore, 45,451, which corresponds to 23.91% of all households within the FCMA market area in 2000. Table 8 provides for each market area the number and percentage of households by Plan income group in 2000.

Table 7
Formula for Conversion of Households from Census Income Ranges
into Study Income Groups

Study Income Group	Study Income Range in 2000 Dollars	Census Income Ranges and Percent in Study Income Group Formula	
Very Low	\$0 to \$17,363	Less than \$10,000	100.0000%
		\$10,000 to \$14,999	100.0000%
		\$15,000 to \$19,999	47.2612%
Low	\$17,364 to \$27,780	\$15,000 to \$19,999	52.7388%
		\$20,000 to \$24,999	100.0000%
		\$25,000 to \$29,999	55.6089%
Moderate	\$27,781 to \$41,670	\$25,000 to \$29,999	44.3911%
		\$30,000 to \$34,999	100.0000%
		\$35,000 to \$39,999	100.0000%
		\$40,000 to \$44,999	33.4059%
Above Moderate	\$41,671 and above	\$40,000 to \$44,999	66.5941%
		\$45,000 to \$49,999	100.0000%
		\$50,000 to \$59,999	100.0000%
		\$60,000 to \$74,999	100.0000%
		\$75,000 to \$99,999	100.0000%
		\$100,000 to \$124,999	100.0000%
		\$125,000 to \$149,999	100.0000%
		\$150,000 to \$199,999	100.0000%
\$200,000 or more	100.0000%		

Table 8
2000 Households Per Market Area Per Income Group

Market Area	Very Low		Low		Moderate		Above Moderate		Total	
	#	%	#	%	#	%	#	%	#	%
FCMA	45,451	23.91%	30,009	15.78%	33,592	17.67%	81,075	42.64%	190,127	100.00%
East Valley	8,206	22.90%	6,115	17.07%	6,913	19.29%	14,594	40.73%	35,828	100.00%
Westside North	3,995	26.13%	3,275	21.42%	3,069	20.08%	4,949	32.37%	15,288	100.00%
Westside South	1,412	24.58%	949	16.53%	1,173	20.43%	2,209	38.47%	5,743	100.00%
Sierra Nevada	1,072	16.97%	813	12.87%	1,086	17.19%	3,347	52.97%	6,318	100.00%
Fresno County	60,135	23.74%	41,161	16.25%	45,833	18.09%	106,175	41.92%	253,304	100.00%

- d. The next step is to determine for each city the number and percentage of households by Plan income group in 2000. This is accomplished by applying the formula developed in Table 7 (and utilized in Table 8) to 2000 U.S. Census household income group data for cities in Fresno County. Table 9 is the result of applying the formula to the raw data for cities and indicates, for 2000, the number and percentage of households by Plan income group for all of the cities in Fresno County.

Table 9
2000 Households Per Jurisdiction Per Income Group

Jurisdiction	Very Low		Low		Moderate		Above Moderate		Total	
	#	%	#	%	#	%	#	%	#	%
Clovis	4,155	17.20%	3,431	14.21%	4,243	17.56%	12,325	51.03%	24,154	100.00%
Coalinga	767	21.71%	518	14.66%	619	17.53%	1,629	46.10%	3,534	100.00%
Firebaugh	340	24.28%	277	19.77%	317	22.62%	467	33.33%	1,400	100.00%
Fowler	292	24.99%	201	17.16%	224	19.16%	452	38.69%	1,169	100.00%
Fresno	37,239	26.61%	23,115	16.51%	25,020	17.88%	54,595	39.00%	139,969	100.00%
Huron	533	37.77%	257	18.22%	319	22.61%	302	21.41%	1,412	100.00%
Kerman	716	30.14%	339	14.28%	492	20.72%	829	34.87%	2,376	100.00%
Kingsburg	609	19.02%	443	13.83%	612	19.13%	1,537	48.02%	3,200	100.00%
Mendota	590	32.43%	477	26.24%	348	19.13%	404	22.21%	1,819	100.00%
Orange Cove	596	35.42%	435	25.84%	292	17.36%	360	21.39%	1,683	100.00%
Parlier	821	33.31%	557	22.61%	553	22.43%	534	21.65%	2,465	100.00%
Reedley	1,338	23.33%	984	17.16%	1,031	17.98%	2,381	41.53%	5,734	100.00%
Sanger	1,350	25.57%	906	17.16%	1,091	20.66%	1,933	36.61%	5,280	100.00%
San Joaquin	231	32.74%	168	23.80%	148	21.02%	158	22.44%	704	100.00%
Selma	1,218	21.67%	958	17.05%	1,257	22.37%	2,186	38.91%	5,618	100.00%
Unincorporated Area	9,341	17.70%	8,095	15.33%	9,267	17.56%	26,084	49.41%	52,787	100.00%
Fresno County	60,135	23.74%	41,161	16.25%	45,833	18.09%	106,175	41.92%	253,304	100.00%

- e. The next step is to determine for the unincorporated area of each market area the number and percentage of households by Plan income group in 2000. This is accomplished by subtracting the city data in Table 9 from the market area data in Table 8, as shown in Table 10. Table 10 incorporates information from Tables 8 and 9 so that the information is available all in one Table.

- f. The 2007 RHNA Plan assumes the percentage of households in each Plan income group is the same for each city and market area unincorporated area on January 1, 2006 as it was in 2000. This assumption is made necessary because 2006 income data, which would indicate income group changes between 2000 and 2006, is not available for use in this Plan. The percentages of households in each Plan income group for each city and market area unincorporated area are posted to column 5 of Table 15.
- g. Table 11 determines each market area's unincorporated percentage of the total County unincorporated households in 2000, in order to calculate the number of unincorporated households in each market area for the January 1, 2006 beginning year of the Plan. Table 11 assumes that the percentage of unincorporated households within each market area is the same in 2006 as it was in 2000. Staff believes this assumption can be made because, just as was the case in the 1990s, there have been virtually no inhabited annexations, most importantly within the FCMA, during the six years between 2000 and 2005. This was not the case during the 1970s and 1980s.

Table 10
2000 Incorporated and Unincorporated Households
Per Market Area Per Income Group

	Very Low		Low		Moderate		Above Moderate		Total	
	#	%	#	%	#	%	#	%	#	%
FCMA										
Total	45,451	23.91%	30,009	15.78%	33,592	17.67%	81,075	42.64%	190,127	100.00%
Clovis	4,155	17.20%	3,431	14.21%	4,243	17.56%	12,325	51.03%	24,154	100.00%
Fresno	37,239	26.61%	23,115	16.51%	25,020	17.88%	54,595	39.00%	139,969	100.00%
Unincorporated	4,056	15.60%	3,462	13.32%	4,329	16.65%	14,156	54.44%	26,004	100.00%
East Valley										
Total	8,206	22.90%	6,115	17.07%	6,913	19.29%	14,594	40.73%	35,828	100.00%
Fowler	292	24.99%	201	17.16%	224	19.16%	452	38.69%	1,169	100.00%
Kingsburg	609	19.02%	443	13.83%	612	19.13%	1,537	48.02%	3,200	100.00%
Orange Cove	596	35.42%	435	25.84%	292	17.36%	360	21.39%	1,683	100.00%
Parlier	821	33.31%	557	22.61%	553	22.43%	534	21.65%	2,465	100.00%
Reedley	1,338	23.33%	984	17.16%	1,031	17.98%	2,381	41.53%	5,734	100.00%
Sanger	1,350	25.57%	906	17.16%	1,091	20.66%	1,933	36.61%	5,280	100.00%
Selma	1,218	21.67%	958	17.05%	1,257	22.37%	2,186	38.91%	5,618	100.00%
Unincorporated	1,983	18.57%	1,631	15.28%	1,853	17.35%	5,212	48.80%	10,679	100.00%
Westside North										
Total	3,995	26.13%	3,275	21.42%	3,069	20.08%	4,949	32.37%	15,288	100.00%
Firebaugh	340	24.28%	277	19.77%	317	22.62%	467	33.33%	1,400	100.00%
Kerman	716	30.14%	339	14.28%	492	20.72%	829	34.87%	2,376	100.00%
Mendota	590	32.43%	477	26.24%	348	19.13%	404	22.21%	1,819	100.00%
San Joaquin	231	32.74%	168	23.80%	148	21.02%	158	22.44%	704	100.00%
Unincorporated	2,118	23.57%	2,014	22.41%	1,764	19.63%	3,092	34.40%	8,989	100.00%
Westside South										
Total	1,412	24.58%	949	16.53%	1,173	20.43%	2,209	38.47%	5,743	100.00%
Coalinga	767	21.71%	518	14.66%	619	17.53%	1,629	46.10%	3,534	100.00%
Huron	533	37.77%	257	18.22%	319	22.61%	302	21.41%	1,412	100.00%
Unincorporated	111	13.93%	174	21.78%	234	29.41%	278	34.87%	797	100.00%
Sierra Nevada										
Total	1,072	16.97%	813	12.87%	1,086	17.19%	3,347	52.97%	6,318	100.00%
Unincorporated	1,072	16.97%	813	12.87%	1,086	17.19%	3,347	52.97%	6,318	100.00%
Incorp. Total	50,794	25.33%	33,066	16.49%	36,566	18.24%	80,091	39.94%	200,517	100.00%
Unincorp. Total	9,341	17.70%	8,095	15.33%	9,267	17.56%	26,084	49.41%	52,787	100.00%
County Total	60,135	23.74%	41,161	16.25%	45,833	18.09%	106,175	41.92%	253,304	100.00%

Total households for the unincorporated area of each market area are derived by applying the ratio between the number of households within the unincorporated portion of a market area (from the 2000 U.S. Census) and the number of households within the entire County unincorporated area (also from the 2000 U.S. Census), to the total County unincorporated households on January 1, 2006. Again, because data is not available for 2006, Fresno COG determined that this was the most appropriate method to allocate January 1, 2006 total County unincorporated households among the market area unincorporated areas. Table 11 provides this data for 2000. The total number of County unincorporated households on January 1, 2006 is from Table 4.

Table 11
2000 Distribution of Unincorporated Households

Market Area	Unincorporated Households	Percentage
FCMA	25,311	48.58%
East Valley	10,671	20.48%
Westside North	8,944	17.17%
Westside South	865	1.66%
Sierra Nevada	6,311	12.11%
County Total	52,102	100.00%

Source: 2000 U.S. Census 100% data

Table 12
2006 Incorporated and Unincorporated Households
Per Market Area

Area	Households
FCMA Total	208,246
Clovis	31,301
Fresno	150,815
Unincorporated Area	26,130
East Valley Total	40,263
Fowler	1,478
Kingsburg	3,866
Orange Cove	2,064
Parlier	2,767
Reedley	6,338
Sanger	6,285
Selma	6,449
Unincorporated Area	11,016
Westside North Total	17,073
Firebaugh	1,620
Kerman	3,450
Mendota	1,983
San Joaquin	787
Unincorporated Area	9,233
Westside South Total	6,098
Coalinga	3,631
Huron	1,574
Unincorporated Area	893
Sierra Nevada Total	6,515
Unincorporated Area	6,515
Incorporated Total	224,408
Unincorporated Total	53,787
County Total	278,195

Source: State of California Department of Finance for the cities and total unincorporated area.

The unincorporated area households were distributed by market area by assuming the same percentage shares of households for 2000 as listed in Table 11.

- h. Table 12 includes for the January 1, 2006 beginning date of the Plan household estimates for each city within each market area (from Table 4), the number of unincorporated households within each market area (determined by applying the % figures from Table 11 to the January 1, 2006 total County unincorporated households), and for each total market area. The total number of households for each market area unincorporated area is posted to column 4 of Table 15.
4. The number of households within each Plan income group for January 1, 2006 is determined by multiplying the income group percentage figures in column 5 by the total number of households for each market area city, market area unincorporated area, and market area total households. The results of these calculations are posted to column 4 of Table 15.

Table 13 utilizes the 2000 information from Table 10 and the January 1, 2006 information from Table 12 to determine information for the June 30, 2013 ending date of the Plan, utilizing a trend line method. The assumption was made that each jurisdiction will account for the same share of the county's growth during the 7 ½ year planning period of the Plan as it did for the period between 2000 and 2006. For example, the number of households in Clovis increased from 24,347 households in 2000 (from Table 9) to 31,301 households in 2006 (from Table 4), an increase of 6,954 households or 27.54% of Fresno County's 2000-2006 growth of 25,255 households. Since this Plan projects Fresno County's households will increase by another 50,078 during this Plan's planning period, Clovis is projected to receive 27.54% of that growth as well, resulting in 45,090 households for Clovis on June 30, 2013. The percentages noted in column 7 of Table 13 titled "Increase 2000-2006" are not growth rates of a particular jurisdiction but rather show each jurisdiction's percentage of the County's total growth during that period.

Information in column 8 of Table 13, projected households for market area cities, market area unincorporated areas, and total market areas, is posted to column 6 of Table 15 as the projected total household figures for the different Plan market areas in June 30, 2013.

5. In the 1990 Regional Housing Needs Allocation Plan, a manual adjustment was made to the FCMA Market Area, specifically to the unincorporated area share of households and to the City of Fresno share of households. This was done to slow the estimated decline in the number of unincorporated households predicted by the trend line method. In 1990 it was determined that the extent of inhabited annexation activity between 1980 and 1989 would slow considerably during the planning period of the 1990 Plan, between January 1, 1989 and June 30, 1996. Consequently, a strict application of the trend line method for FCMA unincorporated households and City of Fresno households was determined not to be warranted.

The degree of inhabited annexation activity during the January 1, 2000 to June 30, 2007 planning period of the 2001 RHNA Plan was projected to be similar to that of the 1990 to 2000 period. Therefore, a manual adjustment for FCMA unincorporated and City of Fresno households was not warranted in the 2001 RHNA Plan, nor is it warranted in the 2007 RHNA Plan for the same reason. The projected total household figures for each market area, market area city and market area unincorporated area from column 8 in Table 13 are posted to column 6 (jurisdictional and market area totals) of Table 15.

**Table 13
Household Estimates and Projections, 2000-2013**

Market Area	City/Unincorporated	2000	2006	2006 %	Increase 2000-2006		Projection 2013
					#	%	
FCMA	Clovis	24,347	31,301	11.25%	6,954	27.54%	45,090
	Fresno	140,079	150,815	54.21%	10,736	42.51%	172,103
	Unincorporated	25,311	26,130	9.39%	819	3.24%	27,754
	FCMA Total	189,737	208,246	74.86%	18,509	73.29%	244,947
East Valley	Fowler	1,242	1,478	0.53%	236	0.93%	1,946
	Kingsburg	3,226	3,866	1.39%	640	2.53%	5,135
	Orange Cove	1,694	2,064	0.74%	370	1.47%	2,798
	Parlier	2,446	2,767	0.99%	321	1.27%	3,404
	Reedley	5,761	6,338	2.28%	577	2.28%	7,482
	Sanger	5,220	6,285	2.26%	1,065	4.22%	8,397
	Selma	5,596	6,449	2.32%	853	3.38%	8,140
	Unincorporated	10,671	11,016	3.96%	345	1.37%	11,700
	East Valley Total	35,856	40,263	14.47%	4,407	17.45%	49,002
Westside North	Firebaugh	1,418	1,620	0.58%	202	0.80%	2,021
	Kerman	2,389	3,450	1.24%	1,061	4.20%	5,554
	Mendota	1,825	1,983	0.71%	158	0.63%	2,296
	San Joaquin	702	787	0.28%	85	0.34%	956
	Unincorporated	8,944	9,233	3.32%	289	1.14%	9,806
	Westside North Total	15,278	17,073	6.14%	1,795	7.11%	20,632
Westside South	Coalinga	3,515	3,631	1.31%	116	0.46%	3,861
	Huron	1,378	1,574	0.57%	196	0.78%	1,963
	Unincorporated	865	893	0.32%	28	0.11%	949
	Westside South Total	5,758	6,098	2.19%	340	1.35%	6,772
Sierra Nevada	Unincorporated	6,311	6,515	2.34%	204	0.81%	6,920
	Sierra Nevada Total	6,311	6,515	2.34%	204	0.81%	6,920
Incorp. Total		200,838	224,408	80.67%	23,570	93.33%	271,145
Unincorp. Total		52,102	53,787	19.33%	1,685	6.67%	57,128
County Total		252,940	278,195	100.00%	25,255	100.00%	328,273

- The next step is to distribute the June 30, 2013 household projections to market area cities and market area unincorporated areas, by income group, after adjustments for low-income impaction. State Housing Element Law (Section 65584 in particular) requires that housing allocations must seek to reduce the concentration of lower income households in cities or counties that are impacted by disproportionately high proportions of lower income households. Fresno COG staff has determined in the draft 2007 RHNA Plan that there is no issue of lower income household impaction for the Sierra Nevada market area. Therefore, the income group percentages were determined to be the same at the end of the 7 ½ planning cycle as they were at the beginning of the cycle. The rationale for this position is described below.

The Sierra Nevada market area is unique among County market areas in that it is entirely unincorporated area. Consequently, there is no opportunity to shift lower income housing from one jurisdiction to another. Furthermore, the growth in total households for this market area during the planning period is projected to be only 405 households. Therefore, the Sierra Nevada market area is determined to be a stable market area, just as it was in the earlier 2001 and 1990 RHNA Plans.

- a. A “same share plan” was applied to the other four market areas. The “same share plan” is intended to reduce the concentration of lower income households in jurisdictions within the four market areas that are impacted by disproportionately high proportions of lower income households. Table 14 provides information as to how this was accomplished.
- b. For each market area on January 1, 2006, the difference between the market area total percentage of households and the jurisdiction’s percentage of households, for each income group, was calculated. The resulting percentage figure was divided by 5.87 (the 44 years assumed necessary to achieve the fair share allocation divided by the 7 and ½ year period of the Plan), resulting in a percentage figure that was then added to the percentage figure for each income group for each jurisdiction on January 1, 2006. Column 7 of Table 14 lists the percentage figures that are the result of these calculations. These percentage figures are then multiplied by the total number of households projected on June 30, 2013 for each jurisdiction within each market area, as noted in column 6 of Table 14. Information in columns 6 and 7 of Table 14 is then posted to columns 6 and 7 of Table 15. This methodology was also utilized in the earlier 2001 and 1990 RHNA Plans, except that the period to achieve the fair share allocation has been changed to coincide with the Blueprint Planning time horizon.

Table 14
Calculation of Household Income Group Allocations
For the FCMA, East Valley, Westside North and South Market Areas

FCMA	Income Group	January 1, 2006 Households		Difference Between FCMA Percentage and Local Jurisdiction Percentage*	June 30, 2013 Fair Share Target	
		#	%		#	%
Clovis	Very Low	5,385	17.20%	-6.61%	8,265	18.33%
	Low	4,447	14.21%	-1.56%	6,525	14.47%
	Moderate	5,498	17.56%	-0.11%	7,928	17.58%
	Above Moderate	15,972	51.03%	8.28%	22,372	49.62%
	Total	31,301	100.00%		45,090	100.00%
Fresno	Very Low	40,125	26.61%	2.79%	44,969	26.13%
	Low	24,906	16.51%	0.75%	28,202	16.39%
	Moderate	26,959	17.88%	0.20%	30,705	17.84%
	Above Moderate	58,825	39.00%	-3.74%	68,227	39.64%
	Total	150,815	100.00%		172,103	100.00%
Unincorporated Area	Very Low	4,076	15.60%	-8.21%	4,713	17.00%
	Low	3,479	13.32%	-2.45%	3,807	13.73%
	Moderate	4,350	16.65%	-1.03%	4,665	16.82%
	Above Moderate	14,224	54.44%	11.69%	14,568	52.44%
	Total	26,130	100.00%		27,754	100.00%
FCMA Total	Very Low	49,586	23.81%		57,946	23.66%
	Low	32,832	15.77%		38,535	15.73%
	Moderate	36,807	17.67%		43,299	17.68%
	Above Moderate	89,021	42.75%		105,167	42.93%
	Total	208,246	100.00%		244,947	100.00%

* Positive numbers in this column indicate that the jurisdiction has a percentage higher than the market area, while negative numbers indicate that the jurisdiction has a percentage lower than the market area. A jurisdiction with 0% would have the same percentage as the market area.

Table 14 (continued)

East Valley	Income Group	January 1, 2006		Difference Between East Valley Percentage and Local Jurisdiction Percentage*	June 30, 2013	
		Households #	%		Fair Share Target #	%
Fowler	Very Low	369	24.99%	1.92%	480	24.66%
	Low	254	17.16%	0.04%	334	17.16%
	Moderate	283	19.16%	-0.20%	373	19.19%
	Above Moderate	572	38.69%	-1.76%	759	38.99%
	Total	1,478	100.00%		1,946	100.00%
Kingsburg	Very Low	735	19.02%	-4.05%	1,012	19.71%
	Low	535	13.83%	-3.29%	739	14.40%
	Moderate	739	19.13%	-0.23%	984	19.16%
	Above Moderate	1,857	48.02%	7.57%	2,400	46.73%
	Total	3,866	100.00%		5,135	100.00%
Orange Cove	Very Low	731	35.42%	12.35%	932	33.31%
	Low	533	25.84%	8.71%	681	24.36%
	Moderate	358	17.36%	-2.00%	495	17.70%
	Above Moderate	441	21.39%	-19.06%	689	24.64%
	Total	2,064	100.00%		2,798	100.00%
Parlier	Very Low	922	33.31%	10.24%	1,074	31.56%
	Low	626	22.61%	5.49%	738	21.68%
	Moderate	621	22.43%	3.08%	746	21.91%
	Above Moderate	599	21.65%	-18.81%	846	24.85%
	Total	2,767	100.00%		3,404	100.00%
Reedley	Very Low	1,479	23.33%	0.27%	1,742	23.28%
	Low	1,088	17.16%	0.03%	1,284	17.16%
	Moderate	1,139	17.98%	-1.38%	1,363	18.21%
	Above Moderate	2,632	41.53%	1.08%	3,094	41.35%
	Total	6,338	100.00%		7,482	100.00%
Sanger	Very Low	1,607	25.57%	2.50%	2,111	25.14%
	Low	1,078	17.16%	0.03%	1,440	17.15%
	Moderate	1,299	20.66%	1.30%	1,716	20.44%
	Above Moderate	2,301	36.61%	-3.84%	3,129	37.27%
	Total	6,285	100.00%		8,397	100.00%
Selma	Very Low	1,398	21.67%	-1.39%	1,783	21.91%
	Low	1,100	17.05%	-0.08%	1,389	17.06%
	Moderate	1,443	22.37%	3.01%	1,779	21.86%
	Above Moderate	2,509	38.91%	-1.55%	3,188	39.17%
	Total	6,449	100.00%		8,140	100.00%
Unincorporated Area	Very Low	2,045	18.57%	-4.49%	2,262	19.33%
	Low	1,683	15.28%	-1.85%	1,824	15.59%
	Moderate	1,912	17.35%	-2.00%	2,070	17.70%
	Above Moderate	5,376	48.80%	8.35%	5,543	47.38%
	Total	11,016	100.00%		11,700	100.00%
East Valley Total	Very Low	9,286	23.06%		11,397	23.26%
	Low	6,896	17.13%		8,430	17.20%
	Moderate	7,794	19.36%		9,527	19.44%
	Above Moderate	16,287	40.45%		19,648	40.10%
	Total	40,263	100.00%		49,002	100.00%

* Positive numbers in this column indicate that the jurisdiction has a percentage higher than the market area, while negative numbers indicate that the jurisdiction has a percentage lower than the market area. A jurisdiction with 0% would have the same percentage as the market area.

Table 14 (continued)

Westside North	Income Group	January 1, 2006		Difference Between Westside North Percentage and Local Jurisdiction Percentage*	June 30, 2013	
		Households #	%		Fair Share Target #	%
Firebaugh	Very Low	393	24.28%	-2.14%	498	24.64%
	Low	320	19.77%	-1.25%	404	19.99%
	Moderate	366	22.62%	2.48%	449	22.20%
	Above Moderate	540	33.33%	0.90%	670	33.17%
	Total	1,620	100.00%		2,021	100.00%
Kerman	Very Low	1,040	30.14%	3.72%	1,638	29.50%
	Low	493	14.28%	-6.75%	857	15.43%
	Moderate	715	20.72%	0.58%	1,145	20.62%
	Above Moderate	1,203	34.87%	2.45%	1,914	34.46%
	Total	3,450	100.00%		5,554	100.00%
Mendota	Very Low	643	32.43%	6.01%	721	31.40%
	Low	520	26.24%	5.21%	582	25.35%
	Moderate	379	19.13%	-1.01%	443	19.30%
	Above Moderate	440	22.21%	-10.22%	550	23.95%
	Total	1,983	100.00%		2,296	100.00%
San Joaquin	Very Low	258	32.74%	6.33%	303	31.66%
	Low	187	23.80%	2.77%	223	23.33%
	Moderate	165	21.02%	0.88%	200	20.87%
	Above Moderate	177	22.44%	-9.98%	231	24.14%
	Total	787	100.00%		956	100.00%
Unincorporated Area	Very Low	2,176	23.57%	-2.85%	2,359	24.05%
	Low	2,069	22.41%	1.38%	2,174	22.17%
	Moderate	1,812	19.63%	-0.51%	1,933	19.71%
	Above Moderate	3,176	34.40%	1.97%	3,340	34.06%
	Total	9,233	100.00%		9,806	100.00%
Westside North Total	Very Low	4,510	26.41%		5,519	26.75%
	Low	3,590	21.02%		4,240	20.55%
	Moderate	3,438	20.14%		4,170	20.21%
	Above Moderate	5,536	32.42%		6,705	32.50%
	Total	17,073	100.00%		20,633	100.00%

* Positive numbers in this column indicate that the jurisdiction has a percentage higher than the market area, while negative numbers indicate that the jurisdiction has a percentage lower than the market area. A jurisdiction with 0% would have the same percentage as the market area.

Table 14 (continued)

Westside South	Income Group	January 1, 2006		Difference Between Westside South Percentage and Local Jurisdiction Percentage*	June 30, 2013	
		Households #	%		Fair Share Target #	%
Coalinga	Very Low	788	21.71%	-3.01%	858	22.22%
	Low	532	14.66%	-1.96%	579	15.00%
	Moderate	636	17.53%	-3.05%	697	18.05%
	Above Moderate	1,674	46.10%	8.02%	1,727	44.73%
	Total	3,631	100.00%		3,861	100.00%
Huron	Very Low	594	37.77%	13.05%	698	35.54%
	Low	287	18.22%	1.59%	352	17.95%
	Moderate	356	22.61%	2.03%	437	22.26%
	Above Moderate	337	21.41%	-16.67%	476	24.25%
	Total	1,574	100.00%		1,963	100.00%
Unincorporated Area	Very Low	124	13.93%	-10.79%	149	15.77%
	Low	195	21.78%	5.16%	199	20.90%
	Moderate	263	29.41%	8.83%	269	27.91%
	Above Moderate	311	34.87%	-3.21%	332	35.42%
	Total	893	100.00%		949	100.00%
Westside South Total	Very Low	1,507	24.72%		1,704	25.16%
	Low	1,014	16.62%		1,131	16.69%
	Moderate	1,255	20.58%		1,403	20.71%
	Above Moderate	2,322	38.08%		2,535	37.43%
	Total	6,098	100.00%		6,773	100.00%

* Positive numbers in this column indicate that the jurisdiction has a percentage higher than the market area, while negative numbers indicate that the jurisdiction has a percentage lower than the market area. A jurisdiction with 0% would have the same percentage as the market area.

7. The final step is to calculate and post in columns 8 and 9 of Table 15 the change in the number of households and the change in the percentage of households from January 1, 2006 to June 30, 2013, by income group for each jurisdiction.

Table 15
Estimated Households on January 1, 2006 by Income Group
and Projected Households on June 30, 2013 With Income Group Allocations

Market Area	Jurisdiction	Income Group	January 1, 2006		June 30, 2013		2006 - 2013	
			Households #	%	Households #	%	Household Growth #	%
FCMA	Clovis	Very Low	5,385	17.20%	8,265	18.33%	2,880	20.89%
		Low	4,447	14.21%	6,525	14.47%	2,079	15.08%
		Moderate	5,498	17.56%	7,928	17.58%	2,430	17.63%
		Above Moderate	15,972	51.03%	22,372	49.62%	6,400	46.41%
		Total	31,301	100.00%	45,090	100.00%	13,789	100.00%
	Fresno	Very Low	40,125	26.61%	44,969	26.13%	4,844	22.75%
		Low	24,906	16.51%	28,202	16.39%	3,296	15.48%
		Moderate	26,959	17.88%	30,705	17.84%	3,746	17.60%
		Above Moderate	58,825	39.00%	68,227	39.64%	9,401	44.16%
		Total	150,815	100.00%	172,103	100.00%	21,288	100.00%
	Unincorporated Area	Very Low	4,076	15.60%	4,713	17.00%	637	39.21%
		Low	3,479	13.32%	3,807	13.73%	328	20.21%
		Moderate	4,350	16.65%	4,665	16.82%	315	19.39%
		Above Moderate	14,224	54.44%	14,568	52.44%	344	21.19%
		Total	26,130	100.00%	27,754	100.00%	1,624	100.00%
	FCMA Total	Very Low	49,586	23.81%	57,946	23.66%	8,361	22.78%
		Low	32,832	15.77%	38,535	15.73%	5,703	15.54%
		Moderate	36,807	17.67%	43,299	17.68%	6,492	17.69%
		Above Moderate	89,021	42.75%	105,167	42.93%	16,145	43.99%
		Total	208,246	100.00%	244,947	100.00%	36,701	100.00%

Table 15 (continued)

Market Area	Jurisdiction	Income Group	January 1, 2006		June 30, 2013		2006 - 2013	
			Households #	%	Households #	%	Household Growth #	%
East Valley	Fowler	Very Low	369	24.99%	480	24.66%	111	23.62%
		Low	254	17.16%	334	17.16%	80	17.14%
		Moderate	283	19.16%	373	19.19%	90	19.30%
		Above Moderate	572	38.69%	759	38.99%	187	39.94%
		Total	1,478	100.00%	1,946	100.00%	468	100.00%
	Kingsburg	Very Low	735	19.02%	1,012	19.71%	277	21.81%
		Low	535	13.83%	739	14.40%	204	16.11%
		Moderate	739	19.13%	984	19.16%	245	19.29%
		Above Moderate	1,857	48.02%	2,400	46.73%	543	42.80%
		Total	3,866	100.00%	5,135	100.00%	1,269	100.00%
	Orange Cove	Very Low	731	35.42%	932	33.31%	201	27.39%
		Low	533	25.84%	681	24.36%	148	20.18%
		Moderate	358	17.36%	495	17.70%	137	18.66%
		Above Moderate	441	21.39%	689	24.64%	248	33.78%
		Total	2,064	100.00%	2,798	100.00%	734	100.00%
	Parlier	Very Low	922	33.31%	1,074	31.56%	153	23.98%
		Low	626	22.61%	738	21.68%	112	17.62%
		Moderate	621	22.43%	746	21.91%	125	19.63%
		Above Moderate	599	21.65%	846	24.85%	247	38.78%
		Total	2,767	100.00%	3,404	100.00%	637	100.00%
	Reedley	Very Low	1,479	23.33%	1,742	23.28%	263	23.03%
		Low	1,088	17.16%	1,284	17.16%	196	17.12%
		Moderate	1,139	17.98%	1,363	18.21%	223	19.52%
		Above Moderate	2,632	41.53%	3,094	41.35%	461	40.33%
		Total	6,338	100.00%	7,482	100.00%	1,144	100.00%
	Sanger	Very Low	1,607	25.57%	2,111	25.14%	504	23.87%
		Low	1,078	17.16%	1,440	17.15%	362	17.14%
		Moderate	1,299	20.66%	1,716	20.44%	418	19.78%
		Above Moderate	2,301	36.61%	3,129	37.27%	828	39.21%
		Total	6,285	100.00%	8,397	100.00%	2,112	100.00%
	Selma	Very Low	1,398	21.67%	1,783	21.91%	386	22.81%
		Low	1,100	17.05%	1,389	17.06%	289	17.11%
		Moderate	1,443	22.37%	1,779	21.86%	336	19.90%
		Above Moderate	2,509	38.91%	3,188	39.17%	679	40.17%
		Total	6,449	100.00%	8,140	100.00%	1,691	100.00%
	Unincorporated Area	Very Low	2,045	18.57%	2,262	19.33%	217	31.67%
		Low	1,683	15.28%	1,824	15.59%	141	20.67%
		Moderate	1,912	17.35%	2,070	17.70%	159	23.20%
		Above Moderate	5,376	48.80%	5,543	47.38%	167	24.46%
		Total	11,016	100.00%	11,700	100.00%	684	100.00%
East Valley Total	Very Low	9,286	23.06%	11,397	23.26%	2,111	24.16%	
	Low	6,896	17.13%	8,430	17.20%	1,534	17.55%	
	Moderate	7,794	19.36%	9,527	19.44%	1,733	19.83%	
	Above Moderate	16,287	40.45%	19,648	40.10%	3,361	38.46%	
	Total	40,263	100.00%	49,002	100.00%	8,739	100.00%	

Table 15 (continued)

Market Area	Jurisdiction	Income Group	January 1, 2006		June 30, 2013		2006 - 2013	
			Households #	%	Households #	%	Household Growth #	%
Westside North	Firebaugh	Very Low	393	24.28%	498	24.64%	105	26.11%
		Low	320	19.77%	404	19.99%	84	20.85%
		Moderate	366	22.62%	449	22.20%	82	20.49%
		Above Moderate	540	33.33%	670	33.17%	131	32.55%
		Total	1,620	100.00%	2,021	100.00%	401	100.00%
	Kerman	Very Low	1,040	30.14%	1,638	29.50%	599	28.46%
		Low	493	14.28%	857	15.43%	364	17.31%
		Moderate	715	20.72%	1,145	20.62%	430	20.46%
		Above Moderate	1,203	34.87%	1,914	34.46%	711	33.77%
		Total	3,450	100.00%	5,554	100.00%	2,104	100.00%
	Mendota	Very Low	643	32.43%	721	31.40%	78	24.91%
		Low	520	26.24%	582	25.35%	62	19.72%
		Moderate	379	19.13%	443	19.30%	64	20.39%
		Above Moderate	440	22.21%	550	23.95%	109	34.98%
		Total	1,983	100.00%	2,296	100.00%	313	100.00%
	San Joaquin	Very Low	258	32.74%	303	31.66%	45	26.64%
		Low	187	23.80%	223	23.33%	36	21.12%
		Moderate	165	21.02%	200	20.87%	34	20.17%
		Above Moderate	177	22.44%	231	24.14%	54	32.07%
		Total	787	100.00%	956	100.00%	169	100.00%
Unincorporated Area	Very Low	2,176	23.57%	2,359	24.05%	183	31.87%	
	Low	2,069	22.41%	2,174	22.17%	105	18.37%	
	Moderate	1,812	19.63%	1,933	19.71%	121	21.12%	
	Above Moderate	3,176	34.40%	3,340	34.06%	164	28.64%	
	Total	9,233	100.00%	9,806	100.00%	573	100.00%	
Westside North Total	Very Low	4,510	26.41%	5,519	26.75%	1,009	28.35%	
	Low	3,590	21.02%	4,240	20.55%	651	18.27%	
	Moderate	3,438	20.14%	4,170	20.21%	731	20.55%	
	Above Moderate	5,536	32.42%	6,705	32.50%	1,169	32.83%	
	Total	17,073	100.00%	20,633	100.00%	3,560	100.00%	

Market Area	Jurisdiction	Income Group	January 1, 2006		June 30, 2013		2006 - 2013	
			Households #	%	Households #	%	Household Growth #	%
Westside South	Coalinga	Very Low	788	21.71%	858	22.22%	70	30.31%
		Low	532	14.66%	579	15.00%	47	20.27%
		Moderate	636	17.53%	697	18.05%	60	26.26%
		Above Moderate	1,674	46.10%	1,727	44.73%	53	23.16%
		Total	3,631	100.00%	3,861	100.00%	230	100.00%
	Huron	Very Low	594	37.77%	698	35.54%	103	26.54%
		Low	287	18.22%	352	17.95%	66	16.85%
		Moderate	356	22.61%	437	22.26%	81	20.86%
		Above Moderate	337	21.41%	476	24.25%	139	35.75%
		Total	1,574	100.00%	1,963	100.00%	389	100.00%
	Unincorporated Area	Very Low	124	13.93%	149	15.77%	24	43.30%
		Low	195	21.78%	199	20.90%	5	8.67%
		Moderate	263	29.41%	269	27.91%	6	11.04%
		Above Moderate	311	34.87%	332	35.42%	21	37.00%
		Total	893	100.00%	949	100.00%	56	100.00%
	Westside South Total	Very Low	1,507	24.72%	1,704	25.16%	197	29.22%
		Low	1,014	16.62%	1,131	16.69%	117	17.33%
		Moderate	1,255	20.58%	1,403	20.71%	148	21.89%
		Above Moderate	2,322	38.08%	2,535	37.43%	213	31.56%
		Total	6,098	100.00%	6,773	100.00%	675	100.00%

Table 15 (continued)

Market Area	Jurisdiction	Income Group	January 1, 2006		June 30, 2013		2006 - 2013	
			Households #	%	Households #	%	Household Growth #	%
Sierra Nevada	Unincorporated Area	Very Low	1,106	16.97%	1,175	16.97%	69	16.97%
		Low	838	12.87%	890	12.87%	52	12.87%
		Moderate	1,120	17.19%	1,190	17.19%	70	17.19%
		Above Moderate	3,451	52.97%	3,666	52.97%	215	52.97%
		Total	6,515	100.00%	6,920	100.00%	405	100.00%
	Sierra Nevada Total	Very Low	1,106	16.97%	1,175	16.97%	69	16.97%
		Low	838	12.87%	890	12.87%	52	12.87%
		Moderate	1,120	17.19%	1,190	17.19%	70	17.19%
		Above Moderate	3,451	52.97%	3,666	52.97%	215	52.97%
		Total	6,515	100.00%	6,920	100.00%	405	100.00%
County Total	Incorporated Area	Very Low	56,466	25.16%	67,084	24.74%	10,618	22.72%
		Low	36,906	16.45%	44,330	16.35%	7,424	15.89%
		Moderate	40,957	18.25%	49,460	18.24%	8,503	18.19%
		Above Moderate	90,079	40.14%	110,271	40.67%	20,192	43.20%
		Total	224,408	100.00%	271,146	100.00%	46,738	100.00%
	Unincorporated Area	Very Low	9,528	17.71%	10,657	18.65%	1,129	33.78%
		Low	8,264	15.36%	8,896	15.57%	632	18.91%
		Moderate	9,457	17.58%	10,127	17.73%	670	20.06%
		Above Moderate	26,539	49.34%	27,450	48.05%	911	27.25%
		Total	53,787	100.00%	57,129	100.00%	3,342	100.00%
	County Total	Very Low	65,994	23.72%	77,741	23.68%	11,747	23.46%
		Low	45,170	16.24%	53,226	16.21%	8,056	16.09%
		Moderate	50,414	18.12%	59,588	18.15%	9,174	18.32%
		Above Moderate	116,618	41.92%	137,721	41.95%	21,103	42.14%
		Total	278,195	100.00%	328,275	100.00%	50,080	100.00%

BASIC CONSTRUCTION NEED

Basic construction need is the number of new housing units that must be constructed to provide housing for the anticipated population. The calculation of the basic construction need for each local jurisdiction and market area considers existing housing units, projected number of households, vacancy factors, and an allowance for normal market removal of housing units. The methodology does not include an estimate of the need to replace dilapidated units that are beyond repair but that are not expected to be removed during the planning period as part of normal market activity. This task is beyond the scope of the 2007 RHNA Plan and is to be estimated by jurisdictions in preparing their housing elements.

Key factors and procedures for calculating the basic construction need are summarized as follows:

1. Provide one housing unit for each anticipated household.
2. Provide a sufficient number of housing units to accommodate vacant for sale units, vacant for rent units, and other vacant units.
3. The sum of items 1 and 2 constitutes the total number of housing units required to accommodate the projected population by the June 30, 2013 ending date of the Plan.
4. Reduce the total number of units required by the number of units existing on January 1, 2006, to obtain the number of units needed to accommodate population growth.

5. Provide a sufficient number of units to replace expected removals from the housing market.
6. The sum of items 4 and 5 constitutes the basic construction need, or total number of new housing units required to house the projected population between January 1, 2006 and June 30, 2013

As noted above, three separate vacancy factors are utilized to provide for units vacant for sale, units vacant for rent, and other vacant units. An owner vacancy rate of 1.8% of the owner occupied housing units, and a renter vacancy rate of 5.0% of the renter occupied housing units are applied, as suggested by the State Department of Housing & Community Development. The other vacant rate is the actual rate for each jurisdiction, from the 2000 U.S. Census.

Table 16 includes for each market area, each city, and each market area unincorporated area the various vacancy rates and also data on the percent of households that are owner-occupied and renter-occupied, all from the 2000 U.S. Census. Information from Table 16 is used in Table 17 to determine the Basic Construction Need for each jurisdiction in the County.

Table 16
2000 Occupancy and Vacancy Rates

Source: 2000 U.S. Census

	Percent of Households that are Owner-Occupied	Percent of Households that are Renter-Occupied	For Sale Vacancy Rate	For Rent Vacancy Rate	Other Vacancy Rate	Total Vacancy Rate
FCMA Total	55.33%	44.67%	1.29%	3.16%	0.94%	5.40%
Clovis	60.67%	39.33%	0.89%	1.78%	0.89%	3.56%
Fresno	50.67%	49.33%	1.39%	3.73%	0.90%	6.03%
Unincorporated Area	75.82%	24.18%	1.19%	1.16%	1.23%	3.58%
East Valley Total	61.72%	38.28%	0.72%	2.12%	1.81%	4.66%
Fowler	59.07%	40.93%	0.00%	1.25%	1.25%	2.51%
Kingsburg	67.27%	32.73%	1.44%	1.89%	0.57%	3.90%
Orange Cove	45.43%	54.57%	0.00%	3.40%	0.00%	3.40%
Parlier	61.31%	38.69%	0.44%	1.64%	1.42%	3.50%
Reedley	57.30%	42.70%	1.01%	2.03%	1.09%	4.13%
Sanger	62.00%	38.00%	0.74%	1.93%	1.32%	3.99%
Selma	62.00%	38.00%	0.74%	1.93%	1.32%	3.99%
Unincorporated Area	66.37%	33.63%	0.68%	2.76%	4.26%	7.71%
Westside North Total	51.84%	48.16%	1.42%	2.14%	3.20%	6.76%
Firebaugh	58.58%	41.42%	2.95%	6.42%	2.72%	12.08%
Kerman	58.13%	41.87%	2.28%	1.30%	0.00%	3.57%
Mendota	44.25%	55.75%	0.00%	2.24%	1.86%	4.10%
San Joaquin	50.85%	49.15%	1.24%	2.02%	1.77%	5.03%
Unincorporated Area	50.74%	49.26%	1.22%	1.66%	4.46%	7.34%
Westside South Total	47.76%	52.24%	2.75%	3.47%	1.49%	7.71%
Coalinga	58.26%	41.74%	3.43%	4.16%	1.87%	9.46%
Huron	33.91%	66.09%	0.00%	2.19%	0.50%	2.69%
Unincorporated Area	27.68%	72.32%	5.20%	1.46%	1.43%	8.09%
Sierra Nevada Total	80.27%	19.73%	3.45%	1.60%	31.71%	36.76%
Unincorporated Area	80.27%	19.73%	3.45%	1.60%	31.71%	36.76%
Incorporated Total	53.08%	46.92%	1.29%	3.27%	0.95%	5.51%
Unincorporated Total	69.15%	30.85%	1.62%	1.45%	7.60%	10.68%
County Total	56.48%	43.52%	1.32%	2.91%	2.35%	6.58%

A normal market removal rate of 0.9% of the year-round housing units is utilized, again as provided by HCD. This removal rate is the number of units to be torn down, boarded up, destroyed by fire or changed to other uses.

The basic construction need for each jurisdiction is calculated as follows:

1. Determine the number of housing units needed at the end of the planning period, June 30, 2013, with an allowance for vacant units.
 - a. Multiply the estimated June 30, 2013 number of households for each jurisdiction (from Table 15) by the percentage of total households within that jurisdiction that were owner-occupied (from Table 16). Divide by the “actual” occupancy rate of owner-occupied housing, or 98.2%, utilized for all jurisdictions pursuant to HCD. (As noted above, 1.8% of the owner occupied units are estimated to be vacant for sale.)
 - b. Add to the number in a. the estimated June 30, 2013 number of households for each jurisdiction (from Table 15) multiplied by the percentage of total households within that jurisdiction that were renter-occupied (from Table 16). Divide by the occupancy rate of renter-occupied housing, or 95.0%, also utilized for all jurisdictions pursuant to HCD. (Again, as noted above, 5% of the renter occupied units are estimated to be vacant for rent.)
 - c. Divide b. by the “other” vacancy rate for each jurisdiction (from Table 16). Post the results to column 4 of Table 17.
2. Determine for each jurisdiction the number of housing units needed to accommodate population growth from the beginning of the planning period on January 1, 2006 to the end of the planning period on June 13, 2013.
 - a. Subtract from the number of housing units needed on June 30, 2013 (determined in Step 1 above), the existing number of housing units on January 1, 2006 (from Table 4). Post the results to column 5 of Table 17.
3. Determine for each jurisdiction the normal market removal of housing units. These are housing units that will be torn down, boarded up, destroyed by fire, changed to commercial use, etc.
 - a. In accordance with methodology provided by HCD, multiply the January 1, 2006 number of housing units by the replacement allowance rate provided by HCD of 0.9%. Post the results to column 6 of Table 17.
4. Determine by jurisdiction and market area the total basic construction need during the planning period extending from January 1, 2006 to June 30, 2013.
 - a. Add the number of units needed to accommodate growth (determined in Step Two) to the number of housing units projected to be removed (determined in Step Three). Post the results to column 7 of Table 17.

Table 17
Basic Construction Needs
January 1, 2006 to June 30, 2013

Market Area	City/Unincorporated	2006 Units	2013 Units	Growth	Normal Market Removals	Total Units Needed
FCMA	Clovis	32,458	47,517	15,059	136	15,195
	Fresno	160,446	180,940	20,494	184	20,678
	Unincorporated	28,138	29,281	1,143	10	1,153
	FCMA Total	221,042	257,738	36,696	330	37,027
East Valley	Fowler	1,519	2,064	545	5	550
	Kingsburg	4,023	5,422	1,399	13	1,411
	Orange Cove	2,153	2,925	772	7	779
	Parlier	2,990	3,564	574	5	580
	Reedley	6,570	7,907	1,337	12	1,349
	Sanger	6,527	8,856	2,329	21	2,350
	Selma	6,701	8,592	1,891	17	1,909
	Unincorporated	11,561	12,350	789	7	796
	East Valley Total	42,044	51,682	9,638	87	9,724
Westside North	Firebaugh	1,806	2,182	376	3	379
	Kerman	3,555	5,953	2,398	22	2,420
	Mendota	2,039	2,395	356	3	359
	San Joaquin	822	1,020	198	2	200
	Unincorporated	9,811	10,436	625	6	631
	Westside North Total	18,033	21,986	3,953	36	3,988
Westside South	Coalinga	3,988	4,102	114	1	115
	Huron	1,614	2,086	472	4	476
	Unincorporated	864	1,002	138	1	139
	Westside South Total	6,466	7,190	724	7	730
Sierra Nevada	Unincorporated	9,823	10,489	666	6	672
	Sierra Nevada Total	9,823	10,489	666	6	672
Total County	Incorp. Total	237,211	285,526	48,315	435	48,750
	Unincorp. Total	60,197	63,558	3,361	30	3,391
	County Total	297,408	349,084	51,676	465	52,141

The final step is to allocate the Basic Construction Need figure for each jurisdiction to the four income groups. This is accomplished by multiplying each jurisdiction's Basic Construction Need figure by the percentage growth of households during the planning period in each income group in each jurisdiction. The results are provided in Table 18.

Table 18
Estimated Housing Construction Need by Jurisdiction and Income Group
January 1, 2006 to June 30, 2013

Market Area	City/Unincorporated	Very Low	Low	Moderate	Above Moderate	Total
FCMA	Clovis	3,174	2,291	2,678	7,052	15,195
	Fresno	4,705	3,202	3,639	9,132	20,678
	Unincorporated	452	233	224	244	1,153
	FCMA Total	8,331	5,725	6,541	16,429	37,027
East Valley	Fowler	130	94	106	220	550
	Kingsburg	308	227	272	604	1,411
	Orange Cove	213	157	145	263	779
	Parlier	139	102	114	225	580
	Reedley	311	231	263	544	1,349
	Sanger	561	403	465	921	2,350
	Selma	435	327	380	767	1,909
	Unincorporated	252	165	185	195	796
East Valley Total	2,349	1,706	1,930	3,739	9,724	
Westside North	Firebaugh	99	79	78	123	379
	Kerman	689	419	495	817	2,420
	Mendota	89	71	73	126	359
	San Joaquin	53	42	40	64	200
	Unincorporated	201	116	133	181	631
Westside North Total	1,131	727	819	1,311	3,988	
Westside South	Coalinga	35	23	30	27	115
	Huron	126	80	99	170	476
	Unincorporated	60	12	15	52	139
	Westside South Total	221	116	145	248	730
Sierra Nevada	Unincorporated	114	86	116	356	672
	Sierra Nevada Total	114	86	116	356	672
Total County	Incorp. Total	11,068	7,748	8,878	21,056	48,750
	Unincorp. Total	1,080	612	672	1,027	3,391
	County Total	12,147	8,360	9,551	22,083	52,141

MANUAL ADJUSTMENTS

Government Code Section 65584.05 provides that within 60 days following receipt of the draft allocation, a local government may request from the Fresno COG a revision of its share of the regional housing need in accordance with the factors described in paragraphs (1) to (9), inclusive, of subdivision (d) of Section 65584.04. The request for a revised share shall be based upon comparable data available for all affected jurisdictions and accepted planning methodology, and supported by adequate documentation.

The City of Kingsburg and the County of Fresno submitted timely letters requesting reduced allocations for their jurisdictions from those determined in the draft RHNA Plan. However, since the total county allocation must be maintained, any reduction in one jurisdiction will require an increased allocation in one or more other jurisdictions. Consequently, COG staff conducted meetings on August 17 and August 24,

2007, with jurisdictions within the Fresno Clovis Metropolitan Area (FCMA) and the East Valley market areas to consider the requested revisions and determine if jurisdictions were willing to modify their allocations.

As a result of these meetings and subsequent discussions and correspondence, RHNA Plan allocations for Kingsburg and the County of Fresno were reduced. This was accomplished because the cities of Clovis, Fresno, Parlier and Selma agreed to somewhat higher allocations, necessary in order to maintain the total county allocation. The specific revisions are as follows:

Within the FCMA Market Area:

- Clovis accepted 203 units from the County (40 very low, 32 low, 36 moderate, and 95 above moderate)
- Fresno accepted 293 units from the County (115 very low, 59 low, 57 moderate, and 62 above moderate)

Within the East Valley Market Area:

- Selma accepted 200 units from Kingsburg (100 moderate and 100 above moderate)
- Selma accepted 60 units from the County (10 low, 25 moderate, and 25 above moderate)
- Parlier accepted 60 units from the County (30 moderate and 30 above moderate)

These jurisdictions accepted these additional units in the spirit of regional cooperation, without which a very difficult state mandate would have been made even more so. Table 19 of the 2007 Fresno County RHNA Plan includes all of these revisions and provides the final allocations by income group for all Fresno County jurisdictions.

The State Department of Housing and Community Development was consulted regarding language in the following four paragraphs. It clarifies that when necessary a city can include an adequate program action in its housing element to utilize land area within its Sphere of Influence to meet the requirement to provide adequate sites to accommodate all of its RHNA Plan allocation by income category. This clarification provides the basis for making mutually agreed transfers of housing need allocation from the County to a city to avoid a cumbersome administrative process in determining the transfer of housing need from the County to a particular city due to annexation.

The 2007 RHNA Plan provides the total housing need allocation by income category for each city in the County, for the unincorporated County, and for the total County. Each city and the County must identify in its housing element an inventory of adequate sites to accommodate its housing need allocation by income category. The sum total of housing need by income category for each of the cities and the unincorporated County cannot be less than the total County housing construction need by income category identified in the RHNA Plan.

A city and the County cannot both claim the same land area in their respective housing elements in order to provide an inventory of adequate sites to accommodate their respective allocation. Some cities in Fresno County may be able to accommodate their respective allocations within their existing jurisdictional boundaries. Other cities, however, may need to annex land area within their sphere of influence in order to provide an inventory of adequate sites to accommodate their respective allocations. In fact, both the City of Clovis and the City of Fresno, in letters agreeing to accept a portion of the County's FCMA allocation, note that they will use all or part of the area within their respective spheres of influence to comply with their final allocations. This is likely the case with many other jurisdictions within Fresno County as well.

In the case of a city proposing to annex land to accommodate any unmet portion of its RHNA allocation, the housing element must include an annexation program to address the remaining allocation. The program must specify actions the city will take early enough within the planning period to indicate annexation can be completed to enable adequate development to occur to meet the remaining RHNA allocation before the end of the planning period. For the land area to be annexed, the program must address appropriate zoning, development standards, and infrastructure capacity to determine, by income category, total residential development capacity. A city can not include in its housing element land proposed to be annexed that is included in the County's housing element or take credit for sites in which the County issued building permits unless the County, in writing, grants approval and commits to appropriately amending its housing element within six months from the date a revised determination of housing need has been finalized. A transfer or revised determination of housing need allocation during the planning period can only occur pursuant to Government Code Section 65584.07.

If a city through its annexation program is unable to provide adequate sites during the planning period to accommodate sufficient development, it must specify a program that commits the City, early enough in the planning period, to revise its land use controls and/or land inventory to provide adequate sites within its jurisdictional boundary to accommodate all the remaining housing need allocation for each income category.

Table 19
Final Estimated Housing Construction Need
by Jurisdiction and Income Group
January 1, 2006 to June 30, 2013

Market Area	City/Unincorporated	Very Low	Low	Moderate	Above Moderate	Total
FCMA	Clovis	3,214	2,323	2,714	7,147	15,398
	Fresno	4,820	3,260	3,696	9,195	20,971
	Unincorporated	297	142	131	88	658
	FCMA Total	8,331	5,725	6,541	16,430	37,027
East Valley	Fowler	130	94	106	220	550
	Kingsburg	308	227	172	504	1,211
	Orange Cove	213	157	145	263	778
	Parlier	139	102	144	255	640
	Reedley	311	231	263	544	1,349
	Sanger	561	403	465	921	2,350
	Selma	435	337	505	892	2,169
	Unincorporated	252	155	130	140	677
	East Valley Total	2,349	1,706	1,930	3,739	9,724
Westside North	Firebaugh	99	79	78	123	379
	Kerman	689	419	495	817	2,420
	Mendota	89	71	73	126	359
	San Joaquin	53	42	40	64	199
	Unincorporated	201	116	133	181	631
Westside North Total	1,131	727	819	1,311	3,988	
Westside South	Coalinga	35	23	30	27	115
	Huron	126	80	99	170	475
	Unincorporated	60	12	15	52	139
	Westside South Total	221	115	144	249	729
Sierra Nevada	Unincorporated	114	86	116	356	672
	Sierra Nevada Total	114	86	116	356	672
Total County	Incorp. Total	11,222	7,848	9,026	21,269	49,366
	Unincorp. Total	925	511	525	869	2,777
	County Total	12,147	8,359	9,550	22,085	52,142

STATE HCD REVIEW OF FINAL 2007 RHNA

The Fresno COG approved the 2007 Fresno County Regional Housing Needs Allocation (RHNA) Plan on November 29, 2007. Government Code Section 65584.01 states that within 60 days of adoption by the council of governments, the State Department of Housing and Community Development (HCD) shall determine whether or not the final allocation plan is consistent with the existing and projected housing need for the region.

HCD reviewed the 2007 Fresno County RHNA and noted that the housing need figure determined for Fresno County of 52,142 units had been fully allocated to the jurisdictions within the County. HCD further noted, however, that the total County allocations by income group were not consistent with the figures provided by HCD, as they must be pursuant to statute. Consequently, staff made technical revisions to the income group calculations for each jurisdiction, which additionally affected very slightly the total allocation for each jurisdiction (from 5 additional units to 14 fewer units).

The Fresno COG Board approved Revised Table 19 incorporating these technical revisions at its meeting on January 24, 2008. Revised Table 19 supersedes the RHNA figures displayed in both original Tables 18 and 19.

**Revised Table 19
Final Estimated Housing Construction Need
by Jurisdiction and Income Group
January 1, 2006 to June 30, 2013**

Market Area	City/Unincorporated	Very Low	Low	Moderate	Above Moderate	Total
FCMA	Clovis	3,275	2,354	2,681	7,073	15,384
	Fresno	4,912	3,304	3,651	9,100	20,968
	Unincorporated	303	144	129	87	664
	FCMA Total	8,490	5,803	6,462	16,260	37,015
East Valley	Fowler	132	96	105	218	551
	Kingsburg	314	230	170	499	1,213
	Orange Cove	218	159	144	260	781
	Parlier	142	104	142	252	639
	Reedley	317	234	260	539	1,350
	Sanger	572	408	459	912	2,351
	Selma	444	341	499	883	2,166
	Unincorporated	257	157	128	138	680
	East Valley Total	2,394	1,729	1,907	3,700	9,730
Westside North	Firebaugh	101	80	77	122	380
	Kerman	702	425	489	809	2,424
	Mendota	91	72	72	124	359
	San Joaquin	54	43	40	63	200
	Unincorporated	205	117	132	179	633
	Westside North Total	1,153	737	809	1,297	3,996
Westside South	Coalinga	35	24	30	26	115
	Huron	129	81	98	168	477
	Unincorporated	61	12	15	51	140
	Westside South Total	226	116	142	247	731
Sierra Nevada	Unincorporated	116	88	114	352	670
	Sierra Nevada Total	116	88	114	352	670
Total County	Incorp. Total	11,436	7,955	8,917	21,048	49,357
	Unincorp. Total	943	518	518	808	2,786
	County Total	12,379	8,473	9,434	21,856	52,142

Appendix

Letter from HCD dated September 8, 2006

Resolution No. 2007-07

Survey of Local Jurisdictions

City of Kingsburg letter dated June 7, 2007 requesting revisions

County of Fresno letter dated June 22, 2007 requesting revisions

Resolution No. 2007-49 Approving the 2007 Fresno
County Regional Housing Needs Allocation Plan

DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
DIVISION OF HOUSING POLICY DEVELOPMENT

1300 Thibe Street, Suite 430
 P. O. Box 992046
 Sacramento, CA 94252-2053
 (916) 323 3177
 FAX (916) 327-2643



September 8, 2006

Ms. Barbara Goodwin, Executive Director
 Fresno Council of Governments
 2035 Tulare Street, Suite 201
 Fresno, CA 93721

Dear Ms. Goodwin:

RE: Regional Housing Needs Determination

This letter transmits Fresno County's Regional Housing Needs Determination upon the conclusion of the consultation process with Fresno Council of Governments (COG) as part of its important role in advancing the State's housing policies in the Fresno County region. Pursuant to State housing element law (Government Code Section 65584 - 65584.01), the Department of Housing and Community Development (Department) is required to provide the COG its determination of Fresno County's existing and projected housing needs.

The attached determination reflects the minimum housing need for Fresno County to enable the COG to prepare its new Regional Housing Needs Plan in accordance with Government Code Sections 65584.04-05 for use in updating the housing elements of each general plan within the County (see Attachment I). Housing elements are required to be updated by June 30, 2008 to accommodate each local government's share of the regional housing need pursuant to Government Code Section 65588(c)(3). Regarding local government's regional housing need allocation, credit may be taken for housing units permitted since the January 2006 baseline of the housing element planning period ending in 2013.

The Department conducted outreach on this regional housing needs assessment process, in consultation Mr. Clark Thompson and Ms. Kathy Chung, of your staff, since late spring of this year. This included a meeting on June 1, 2006 at your office to brief COG staff and representatives of member cities and Fresno County on applicable requirements, as amended effective in 2005. Department staff noted, for example, that the methodology to be developed by the COG involves new requirements relating to development of the allocation and factors to be considered.

This determination has resulted from consultation with COG staff and the Department of Finance's (DOF) Demographic Research Unit. Consultation was completed on September 5, 2006 with Mr. Thompson when agreement was reached concerning the methodology and assumptions for population growth and housing need applicable to Fresno County during the allocation period.

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 FRESNO CO

Ms. Barbara Goodwin, Executive Director
Page 2

The Regional Housing Needs Determination for Fresno County has been calculated from a baseline of January 2006 through the end of the housing element planning period ending June 2013. This determination projects the minimum housing need to be accommodated in the region over this period. In light of the rate of population growth in the region, jurisdictions should consider planning for housing need above the minimum determination.

The Regional Housing Needs Plan developed by the COG is required to be consistent with the following objectives, as set forth in more detail in statute (Section 65584(d)):

- (1) Increasing the housing supply and the mix of housing types, tenure, and affordability;
- (2) Promoting infill development and socioeconomic equity, protection of environmental and agricultural resources, and encouragement of efficient development patterns;
- (3) Promoting an improved intraregional relationship between jobs and housing; and
- (4) Balancing the distribution of households by income category.

The Department is available to further discuss development and implementation of Fresno County's Regional Housing Needs Plan and assist the County and cities in addressing local housing needs. Please contact Glen Campora at (916) 327-2640.

Sincerely,



Cathy E. Creswell
Deputy Director

Enclosures

cc: Clark Thompson, Planning Coordinator, Fresno Council of Governments
Kathy Chung, Planning Coordinator, Fresno Council of Governments

Attachment 1
Regional Housing Need Determination
Fresno County
For the Period January 2006 Through June 30, 2013

<u>Income Category</u>	<u>Housing Unit Need</u>	<u>Percent</u>
Very Low	12,379	23.8
Low	8,473	16.2
Moderate	9,434	18.1
Above Moderate	<u>21,856</u>	<u>41.9</u>
Total	52,142	100%

Attachment 2

Explanation of Fresno County Regional Housing Need Determination For the Period January 1, 2006 Through June 30, 2013

Methodology, Assumptions, and Data Sources Used to Project Housing Unit Need:

1. Household (HH) growth (50,078 "occupied housing units" 1/1/2006): estimate by California Department of Finance (DOF) in its E-5 report (Population and Housing Estimates for Cities, Counties and the State, 2001-2006, with 2000 Benchmark, May 2006). Population projections for 7/1/2013 are based on DOF's P-3 report (Population Projections by Race/Ethnicity, Gender and Age for California and Its Counties 2000-2050, May 2004). DOF 2013 projected HHs are derived using the cohort-component method by applying age- and ethnicity-specific HH formation ratios from Census 2000 to the projected population. Projected change in population (99,849) reflects the change between January 1, 2006 (899,517) through June 30, 2013 (999,366). Projected change in HH growth (50,078) also reflects the change between January 1, 2006 (278,195) through June 30, 2013 (328,273). Projected HH growth was derived from averaging Census 2000 HH formation ratios with trended HH formation ratios that Fresno COG used in projections and then multiplying the derived HH formation ratios against DOF's 2013 projected HH population change. This HH growth reflects lower household formation ratios compared to those of the 1990 Census which would yield projected HH growth of 72,575 and total housing unit need of 75,566.
2. Homeowner and Renter households (HHs): allocation based on Census 2000 proportion of owner-occupied HHs (56.5%) held constant through projection period. Renter HHs reflect the difference in subtracting homeowner HHs from projected HH growth.
3. Vacancy allowance: rates of 1.8% (owner) and 5.0% (renter) reflect adjustments from standard targets of 2.0% and 6.0%, respectively, for current conditions. Standard targets identified by Office of Planning and Research, Economic Practices Manual (1984:37).
4. Replacement allowance: empirical demolition rate per housing unit averages .06% per year for 2000 through 2005 based on DOF demolition permit data (990 total demolition permits in Fresno county, 2000-2005). This number was adjusted to .12% per year to account for missing permits and use conversions not involving demolition. This figure was multiplied by 7.5 (to derive percentage replacement over the entire planning period) to yield the .9% replacement allowance rate.
5. Income category allocation: each income category was calculated by multiplying total housing need by the proportion of HHs in each income category based on Fresno County median income (Census 2000) and income definitions (Health and Safety Code Sections 50079.6 and 50105, et.seq.).

Housing Unit Need Projection:

Household growth, Census 2000 headship rates (1)	50,078	
Homeowner HHs (2)	56.5%	28,294
Homeowner HH vacancy allowance (3)	1.8%	509
Renter HHs	43.5%	21,784
Renter HHs vacancy allowance (3)	5.0%	1,089
Subtotal		51,676
Replacement allowance (4)	0.9%	466
Total		52,142

BEFORE THE
COUNCIL OF FRESNO COUNTY GOVERNMENTS
RESOLUTION NO. 2007-07

In the Matter of:)
2007 Regional Housing)
Need Allocation Plan)
_____)

RESOLUTION OF APPROVAL
METHODOLOGY FOR 2007
REGIONAL HOUSING NEED
ALLOCATION PLAN

WHEREAS, the Council of Fresno County Governments (COG) is the Regional Transportation Planning Agency for Fresno County; and

WHEREAS, the overarching purposes of the 2007 Fresno County Regional Housing Need Allocation Plan (RHNA Plan), along with similar RHNA Plans developed for other regions of the state, are to address the statewide concern for 'decent housing and a suitable living environment for every California family,' and to reflect the shared responsibility among local governments for accommodating the housing needs of all economic levels; and

WHEREAS, the allocation of the regional housing need, by income category, to individual cities and counties within a region is typically determined by the region's COG; and

WHEREAS, the Fresno COG is responsible for preparing the RHNA Plan; and

WHEREAS, Fresno COG staff and the Policy Advisory Committee are recommending that the same methodology successfully used in the 2001 RHNA Plan and earlier RHNA Plans be used in the 2007 RHNA Plan; and

WHEREAS, the methodology is acceptable to HCD, is relatively straightforward to understand and implement, reflects a city-centered and balanced development pattern, and allows for the ability to make manual adjustments to each jurisdiction's allocation of the regional housing construction need; and

WHEREAS, housing market areas are used throughout the RHNA Plan in the gathering, analysis, and presentation of data; and

WHEREAS, Fresno COG staff and the Policy Advisory Committee believe that the same five market areas used in the 2001 RHNA Plan remain valid and recommend their use in the 2007 RHNA Plan; and

WHEREAS, the 60-day public comment period of the methodology to be used in the development of the Regional Housing Needs Allocation Plan was initiated on December 8, 2006; and

WHEREAS, a public hearing was conducted on February 22, 2007 to hear and consider comments on the methodology for the 2007 RHNA Plan.

NOW, THEREFORE, BE IT RESOLVED, that the Council of Fresno County Governments adopts the methodology for the 2007 Fresno County Regional Housing Needs Allocation Plan.

THE FOREGOING RESOLUTION was passed and adopted by the Council of Fresno County Governments this 22nd day of February, 2007.

AYES: Clovis, Coalinga, Firebaugh, Fowler, Fresno, Huron, Kerman, Kingsburg, Mendota, Orange Cove, Parlier, Reedley, San Joaquin, Sanger, Selma & Fresno County

NOES: None

ABSTAIN: None

ABSENT: None

ATTEST:

I hereby certify that the foregoing is a true copy of a resolution of the Council of Fresno County Governments duly adopted at a regular meeting thereof held on the 22nd day of February, 2007.

Signed: Barbara Goodwin
Barbara Goodwin, Executive Director

Signed: _____

Trinidad M. Rodriguez, Chairman

Survey

Regional Housing Needs Allocation (RHNA) Plan

The purpose of this survey is to gather information regarding local government infrastructure, housing market, and other local conditions that could influence the development of a methodology for distributing the existing and projected regional housing need to cities within Fresno County and to the County itself. None of the information received in response to this survey may be used as a basis for reducing the total housing need established for Fresno County. Furthermore, the share of the regional housing need distributed to a jurisdiction represents a planning objective, not a construction quota, to be addressed by the jurisdiction in its Housing Element.

The methodology used in the development of the RHNA Plan, as with previous RHNA Plans, will be very objective. However, the final distribution of regional housing need may result in part from negotiations among various agencies. Information developed from this survey will be most appropriately utilized during this negotiation period, should it be necessary. Other sources of information will also be utilized including, for example, the COG Traffic Model, which has information on jobs/housing ratios.

In a few instances, it may be difficult to know what the survey question is trying to get at (the questions were taken directly from statute). Please do not hesitate to contact Clark Thompson at 233-4148 or by email at clarkt@fresnocog.org to discuss. For the other questions, please utilize only sufficient, **readily-available** data in support of your answer. Also, please let Clark know if you would like the survey emailed to you.

1. Would you say your jurisdiction is different than, or pretty much the same as, other jurisdictions in Fresno County regarding existing and projected jobs and housing relationship? If different, indicate how.

2. Opportunities and constraints to development of additional housing:

- a. Is there a lack of capacity for sewer or water service due to state laws, regulations or regulatory actions, or supply and/or distribution decisions made by a sewer or water service provider *other than the local jurisdiction* that precludes your jurisdiction from providing necessary infrastructure for additional development during the planning period? If so, please explain.

b. Is there available land suitable for urban development or for conversion to residential land use, including underutilized land use and opportunities for infill development and increased residential densities, within your jurisdiction and sphere of influence? If not, indicate why. [Note: In developing the RHNA Plan, COG 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.]

c. Are there lands within your jurisdiction that are 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? If so, please identify.

d. **For Fresno County only.** Are there county policies to preserve prime agricultural land within the unincorporated area? If so, what are they?

3. **For Fresno COG only.** What is the distribution of household growth assumed for purposes of a comparable period of regional transportation plans and what are the opportunities to maximize the use of public transportation and existing transportation infrastructure?

4. Do you believe the market demand for housing in your jurisdiction, relative to the market demand for housing in other Fresno County jurisdictions, will change significantly between January 1, 2006 and July 1, 2013? If so, explain.

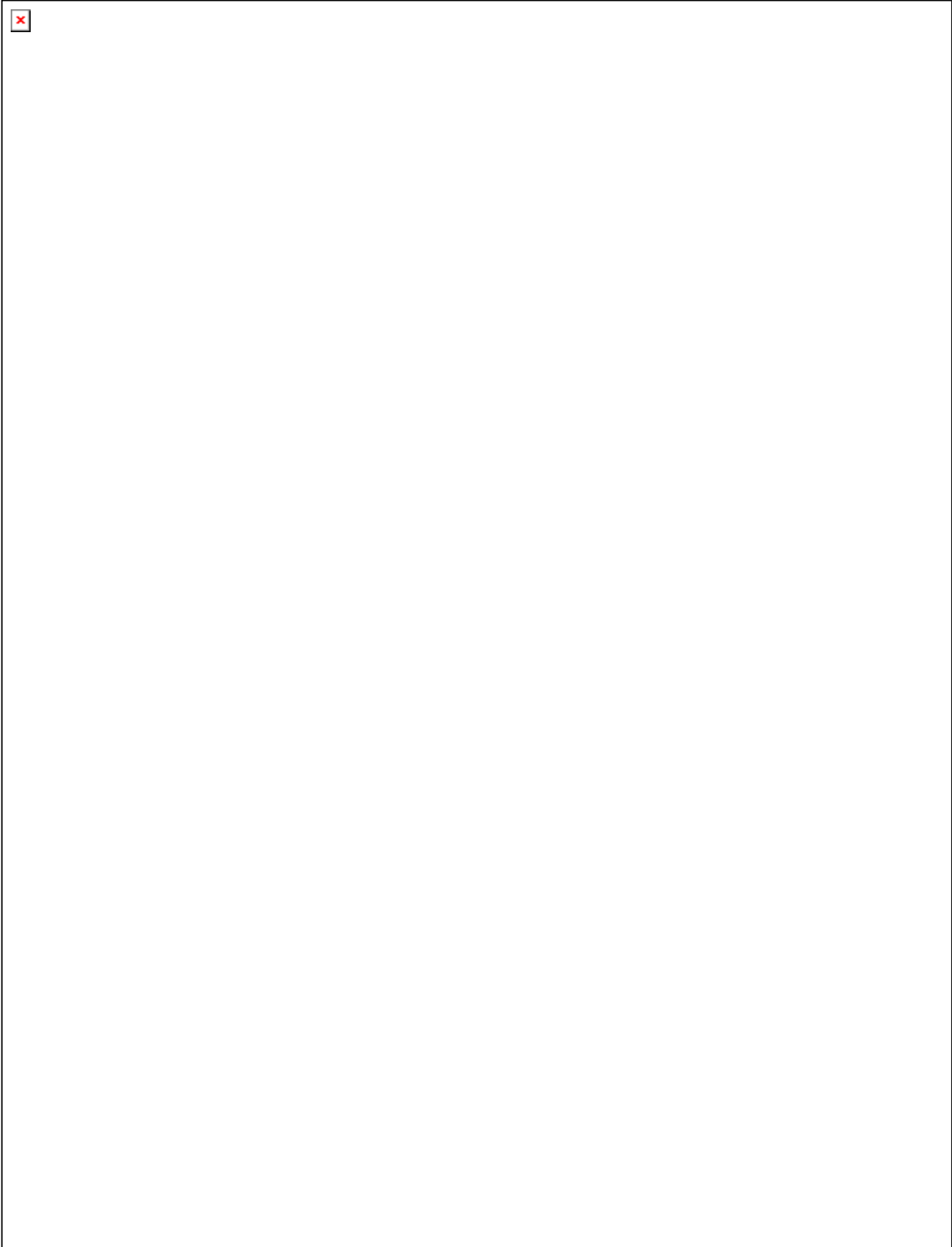
5. **For Fresno County only.** Do agreements exist between the county and the cities in the county to direct growth toward incorporated areas of the county? If so, please explain.

6. **For Housing Authorities of Fresno only.** Has there been a loss of units contained in assisted housing developments that changed to non-low-income use through mortgage prepayment, subsidy contract expirations, or termination of use restrictions.

7. Do you think that high housing costs are more of a burden in your jurisdiction than they are in other jurisdictions in Fresno County?

8. Do you think that the housing needs of farmworkers are a more serious issue in your jurisdiction than in the other jurisdictions in Fresno County.

9. Are there any other factors which in your view should be incorporated into the methodology that allocates regional housing needs to the individual jurisdictions?



that reflects the 20+ year growth history of the City based on Building Division records. You will observe that the period 2000-2005 is an anomaly.

Compounding this situation is the fact that some of Kingsburg's neighboring communities in the East Valley Market Area grew more slowly during the 2000-2005 time frame than they have historically or aim to currently. The 2007 RHNA analysis indicates that they capture a smaller share of the market area growth, and Kingsburg a larger share, than is currently realistic.

For instance, Reedley put development on hold for 2-3 years while going through a comprehensive specific plan process. Other communities had to curb growth while overcoming infrastructure deficiencies. With the impending construction of the State Route 180 freeway to the Sanger area, residential development in that city is now booming, where it was not before. And while Selma's new housing construction was not so much greater than Kingsburg's from 2000 to 2005 (853 dwelling units compared to 640, according to Table 13 in the 2007 RHNA Plan), Selma's population is already more than double Kingsburg's, and Selma officials are vocal about their city's pro-growth attitude and their plans for extremely large housing projects. They are publicly pressing officials of the regional sewage treatment provider, the Selma-Kingsburg-Fowler County Sanitation District, to provide enough capacity to serve thousands of new housing units in their city in the next several years.

In contrast, housing construction in Kingsburg has been slow to rebound after implementation of the Growth Management System in mid-2005. Building permits for only two new homes were pulled during all of 2006, and only a handful of permits have been issued so far in 2007.

The Growth Management System consists of an addition to the City Charter, revised General Plan policies, an enforcement ordinance setting up a growth allocation system, and an Environmental Impact Report. Voters approved the amendment to the Charter calling for growth control with an 81.5 percent affirmative vote, demonstrating that sentiment for regulated growth in the City of Kingsburg is very strong.

The Growth Management System Ordinance calls for the awarding of housing construction allocations annually based on a cap sufficient to accommodate the City's 2001 RHNA Plan share of 832 housing units over the 7-1/2 year life of the Plan. The basic annual allocation is 115 housing units per year, with some exemptions and allowances, coinciding nicely with the long-standing 3 percent policy.

The 2007 Plan calls for Kingsburg to absorb 1,411 housing units, a 70 percent increase over the 2001 plan. Over the 7-1/2 year life of the plan Kingsburg would have to average 188 new housing units per year. However, since only two new units were constructed during the first year of the plan (2006), the average gets pushed up to 217 housing units a year for the 6-1/2 year period 2007 to mid-2013. That is over 100 dwelling units per year more than the Growth Management System ordinance currently accommodates. City officials were well aware that the growth allocation cap would have to be adjusted from time to time, but an 89 percent increase from 115 to 217 units per year would be considered unreasonable and unacceptable to the citizenry.

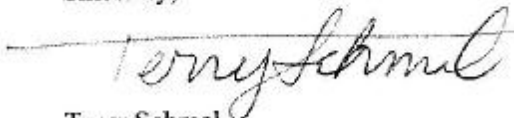
Kingsburg is fully prepared to accept its fair share of responsibility for new housing development in the region. Its managed growth policy is intended to accommodate a substantial sustainable rate of residential development while ensuring that the ability of the city and schools to provide facilities and services is not outstripped. A 3 percent growth rate means that a community doubles in size in 23 to 24 years.

At a 3 percent rate of growth, over 7-1/2 years Kingsburg would add about 1,000 housing units to its January 1, 2006, inventory of 4,023. Such a number Kingsburg officials regard as a more reasonable RHNA Plan allocation; it represents a 20 percent increase over Kingsburg's 2001 RHNA Plan allocation of 832.

We believe a manual adjustment reducing Kingsburg's allocation by several hundred housing units could be accomplished by dividing those housing units among neighboring jurisdictions that are anticipating, preparing for and in some cases actively pursuing development of housing units well in excess of the allocations those communities would receive in the Revised Draft 2007 RHNA Plan. Kingsburg officials have contacted representatives of some of those jurisdictions regarding such a shift in allocations. While discussions have been slow to materialize, the proposal has not been rejected.

Thank you for your consideration of our request. Please contact me (897-5328) or City Manager Don Pauley (897-5821) for additional information.

Sincerely,



Terry Schmal
Planning and Development Director

City of Kingsburg housing construction - 1985 through 2006

A 3 percent average growth rate was adopted by General Plan policy in 1988. At a 3 percent rate of growth the population will double in between 23 and 24 years.

	1985		Senior complex		Growth control		Second half 1980s	
	1986	1987	1988	1989	1990	1991	1992	1993
Housing inventory	1,927	2,051	2,245	2,390	2,423	NEW	NEW	NEW
New units	124	194	145	102	598			
Percentage increase	6.4%	9.5%	6.5%	1.4%	4.2%			

	1990	1991	1992	1993	1994	1995	1996	1997	1998	1999	2000s
Housing inventory	2,525	2,592	2,667	2,743	2,865	2,947	3,001	3,088	3,181	3,246	NEW
New units	67	75	76	122	82	54	87	93	65	80	801
Percentage new	2.7%	2.9%	2.8%	4.4%	2.9%	1.8%	2.9%	3.0%	2.0%	2.5%	

	2000	2001	2002	2003	2004	2005	2006	2007	2000s
Housing inventory	3,326	3,458	3,559	3,698	3,900	3,981	4,030	4,032	NEW
New units	132	101	139	202	81	49	2	*	706
Percentage new	4.0%	2.9%	3.9%	5.5%	2.1%	1.2%	0.0%		
				Stopped annexing		New system			

1986 - The Park Kingsburg senior citizens complex, with over 100 housing units, was constructed.

1988 - General Plan growth policies were initiated. While they have been modified occasionally, most recently in 2005, they have been effective since.

2003 - A Growth Limitation Ordinance was enacted for 2 years that halted annexations of land for residential development.

2005 - The new Growth Management System Ordinance was adopted in July.

* Through the end of May between 5 and 10 permits for new housing units were issued in 2007.

Clark Thompson

From: Terry Schmal [tschmal@clearskye.net]
Sent: Thursday, November 09, 2006 4:07 PM
To: Clark Thompson
Subject: Survey

Sorry, Clark, that I missed the Tuesday deadline for the RHNA survey. I hope these responses still do some good and that it's OK to submit them this way.

1. Kingsburg is somewhat different than other jurisdictions in Fresno County when it comes to jobs-housing balance. Over the last 2-3 decades Kingsburg has developed into a bedroom community where residential growth has outstripped industrial and commercial growth several times over. The City is attempting to bring development into better balance by adopting a Growth Management System to hold housing growth at a steady 3 percent per year while stimulating industrial and commercial development and the creation of jobs. The City is in the process of annexing a large swath of the Golden State Industrial Corridor (about 450 acres) which should create many new opportunities for the stimulation of business.

2.a. The Selma-Kingsburg-Fowler County Sanitation District (S-K-F) is confronting the potential for capacity issues based on projected growth in the three cities it serves. With proper foresight and planning for plant and trunk line expansion and enhancements, sewer capacity is not expected to become a major constraint on development in Kingsburg.

2.b. Kingsburg's expansion is constrained by the Tulare County line cutting diagonally across the southeast side of downtown, the Sphere of Influence of the City of Selma on the northwest, and the S-K-F treatment plant to the west. The City is also committed to the preservation of some of the finest agricultural land to be found anywhere in the world to the east across Madsen Avenue. There is room for new development for the short term, but over the long term these barriers will become increasingly prominent.

2.c. There are no protected lands within the City of Kingsburg, but there are properties under Williamson Act contract adjacent to the City and sprinkled between the city limits and Sphere of Influence line.

2.d. County question. (County General Plan policies call for protection of agricultural land, and the Williamson Act program is one of the primary tools for enforcement. The Memorandum of Understanding between the County and the City of Kingsburg, executed late last year and effective for 15 years, also enforces policies that prevent speculative annexations and premature conversion of agricultural land.)

3. COG question. (Kingsburg has included a potential light rail corridor in its North Kingsburg Specific Plan and clustered higher densities of residential development around it with transit-oriented development in mind. However, that area is probably years away from development.)

4. The anticipation is that Kingsburg's Growth Management System will maintain residential growth at a fairly stable 3 percent per year level throughout the planning period and that Kingsburg will not be as susceptible to the peaks-and-valleys cycles that other parts of Fresno County may experience. The peaks will not be as high in Kingsburg because of the limitations of the growth allocation system, and pent-up demand and the desirability of the community will prevent the valleys from being as deep.

5. County question. (The Memorandum of Understanding exists in part for this purpose.)

6. Housing Authority question.

7. High housing costs are more of a burden in Kingsburg than other jurisdictions, especially those outside of the metropolitan area. It is our impression that home prices are higher in Kingsburg than any other jurisdiction in the County besides Clovis and possibly Fresno.

11/9/2006

8. Farmworker housing is a major issue in the region but does not seem to be one within Kingsburg's city limits. There are farm labor camps in the rural area some distance west of Kingsburg, and heavy farmworker populations in the rural unincorporated towns that are generally considered part of the Kingsburg district like London and Traver in Tulare County. However, city officials have not been made aware of demand for specialized housing for farmworkers in Kingsburg through such social services entities as the Kingsburg Community Assistance Program or local churches, or from other sources.

9. Since 1988 Kingsburg has had policies in the General Plan calling for a 3 percent growth rate, and the City has been successful in attaining that rate overall. From the 1990 census through the 2000 census to the 2005 State Department of Finance estimate, Kingsburg's population growth has been 3.0 percent, and the increase in the number of housing units is very similar. City and school district officials have determined that this is the rate of growth that Kingsburg can sustain while providing necessary facilities and services. It is a healthy rate of growth that means the City will double in population every 23 to 24 years despite the constraints caused by the Tulare County line and other barriers. We believe this is the target rate that should be reflected in the RHNA methodology.

Thanks, Clark. Please contact me with any questions.

Terry Schmal

Please note new e-mail address:

tschmal@cityofkingsburg.ca.gov

Planning and Development Director

City of Kingsburg

(559) 897-6551

11/9/2006



County of Fresno

DEPARTMENT OF PUBLIC WORKS AND PLANNING
ALAN WEAVER, DIRECTOR

June 22, 2007

RECEIVED

JUN 26 2007

BY: _____
FRESNO CO.

Barbara Goodwin, Executive Director
Council of Fresno County Governments
2035 Tulare Street, Ste. 201
Fresno, CA 93721

Dear Ms. Goodwin:

Subject: Fresno County Regional Housing Needs Allocation Plan

Thank you for the opportunity to review and comment upon the April 2007 draft of the Fresno County Regional Housing Needs Allocation Plan. The Council of Governments (COG) is to be complimented for the systematic and inclusive approach that has been taken in the compilation and refinement of the Housing Plan.

The County agrees that it is reasonable to use distribution of existing housing units as a starting point for allocation of new units through the Housing Plan. There are, however, mitigating circumstances and changing conditions that diminish the validity of some numbers produced by this methodology, especially with regard to the allocation of units in the Fresno-Clovis Metropolitan Area (FCMA) market area. The County advocates reduction of housing units allocated to unincorporated areas, especially in the metropolitan area, and adjustment in the income group allocation ratios.

Among the factors supporting these modifications is the County's General Plan. The Housing Plan acknowledges the guiding principles of the General Plan but does not fully reflect the County's level of commitment to these principles. The April 2007 draft of the Housing Plan makes reference to the County General Plan as methodology attribute 4 of its Study Approach (Page 2):

"The methodology reflects a city-centered and balanced development pattern that is substantially consistent with local agency general plans, including Fresno County's General Plan, adopted on October 3, 2000."

The Housing Plan's Estimated Housing Construction Need by Jurisdiction and Income Group Table (Table 18) calls for the unincorporated area to absorb 3,391 of 52,141 units.

DEVELOPMENT SERVICES DIVISION
2220 Tulare Street, Sixth Floor / Fresno, California 93721 / Phone (559) 262-4055 / 262-4029 / 462-4320 / 262-4022 / FAX 262-4893
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One third of the unincorporated area allocation, 1,153 units, is assigned to the FCMA. Yet the FCMA is an area that is particularly subject to conversion of unincorporated territory to the jurisdiction of the cities. The Housing Plan's section on Allocating Household Growth (Page 9) indicates that in some prior RHNA Plans, the number of unincorporated households within the FCMA market area was projected to decline:

"Prior to 1990 there had occurred a historic decline in the population of the of the unincorporated area of Fresno County, with regard to both the overall ratio of the unincorporated to incorporated population and a real decline in actual numbers. For example, the 1990 RHNA Plan indicated the number of unincorporated households within the FCMA market area actually declined by 11,733 households between 1980 and 1989, or from 27.42 percent of total FCMA market area households in 1980 to 14.75 percent in 1989. And while the percentage change during the same period for the other market areas was generally positive (the Westside South market area being the exception), it was less than ½ to 1 percent.

"Two factors in particular contributed to this declining unincorporated population: County policy relative to urban development in unincorporated areas and aggressive city annexation activities, particularly annexation of inhabited areas by the City of Fresno, between 1980 and 1989."

In the 1990 RHNA, the trend of a declining unincorporated population with the FCMA market area was not projected to continue. A manual adjustment to the growth trend was applied to reflect this.

"This manual adjustment was based on a determination that "institutional barriers" were expected to reduce significantly the rate of inhabited annexation activity during the 1989-1996 planning period."

Current projects indicate that inhabited annexation activity by Fresno and Clovis will be on the increase. In September 2006, during the period covered by the 2007 RHNA Plan, the City of Clovis completed the Locan-Nees Annexation, an inhabited annexation covering 520 acres and containing approximately 100 housing units. The City of Fresno is in the processing of beginning a Proactive Island Annexation Program. These projects would result in a decline in the unincorporated population of the FCMA market area, similar to that seen between 1980 and 1989.

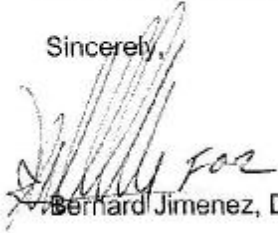
The Housing Plan calls for 32 percent (1,080 units) of housing developed in the unincorporated area to be affordable to very low-income households, and 18 percent (612 units) to be affordable to low-income households. Housing units likely to be constructed in unincorporated areas are those that can be developed as a matter of right on predominantly large parcels. Ranch houses and custom homes on estate-size lots are likely to be affordable only to those households in the upper income brackets. It is excessive to project that 1,692 housing units – half of the unincorporated area total – will be affordable to households with incomes that are 80 percent of County median incomes or less.

The cost of land and economies of scale dictate that the most affordable dwelling units can be developed at urban densities. With the General Plan directing such density of development to cities, the Housing Plan income group allocations for unincorporated areas are unattainable.

Council of Fresno County Governments
June 22, 2007
Page 3

Thank you for your consideration of these recommendations. Enclosed is a copy of the Regional Housing Needs Allocation Plan Survey. Questions can be directed to me or to Bernard Jimenez, Manager of the Development Services Division, at (559) 262-4497.

Sincerely,



Bernard Jimenez, Division Manager

BJ:JN:
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Enclosure

Survey

Regional Housing Needs Allocation (RHNA) Plan

The purpose of this survey is to gather information regarding local government infrastructure, housing market, and other local conditions that could influence the development of a methodology for distributing the existing and projected regional housing need to cities within Fresno County and to the County itself. None of the information received in response to this survey may be used as a basis for reducing the total housing need established for Fresno County. Furthermore, the share of the regional housing need distributed to a jurisdiction represents a planning objective, not a construction quota, to be addressed by the jurisdiction in its Housing Element.

The methodology used in the development of the RHNA Plan, as with previous RHNA Plans, will be very objective. However, the final distribution of regional housing need may result in part from negotiations among various agencies. Information developed from this survey will be most appropriately utilized during this negotiation period, should it be necessary. Other sources of information will also be utilized including, for example, the COG Traffic Model, which has information on jobs/housing ratios.

In a few instances, it may be difficult to know what the survey question is trying to get at (the questions were taken directly from statute). Please do not hesitate to contact Clark Thompson at 233-4148 or by email at clarkt@fresnocog.org to discuss. For the other questions, please utilize only sufficient, readily-available data in support of your answer. Also, please let Clark know if you would like the survey emailed to you.

1. Would you say your jurisdiction is different than, or pretty much the same as, other jurisdictions in Fresno County regarding existing and projected jobs and housing relationship? If different, indicate how.

Fresno County differs from other jurisdictions within the County with regard to existing and projected job growth and housing. Fresno County generally plans and provides for more rural type development. Although many County residents work in the incorporated jurisdictions or other urbanized areas as these areas serve as the employment centers, there are also agriculturally based employment centers which tend to employ mainly residents of Fresno County. In 2000, agricultural employment accounted for 17.9 percent (58,900) of all employment in the County, according to the State Employment Development Department (EDD). As such, Fresno County also provides a disproportionate share of farm-worker housing when compared to other jurisdictions with Fresno County.

2. Opportunities and constraints to development of additional housing:

- a. Is there a lack of capacity for sewer or water service due to state laws, regulations or regulatory actions, or supply and/or distribution decisions made

by a sewer or water service provider *other than the local jurisdiction* that precludes your jurisdiction from providing necessary infrastructure for additional development during the planning period? If so, please explain.

There are many areas within the jurisdiction of Fresno County that are known to be water deficient which has a direct impact on the ability to develop housing. In addition, there are areas which do not contain soils that are conducive to individual septic systems which may then require tertiary treatment facilities. The cost for construction/maintenance of such a facility may not be economically feasible.

In addition, there are unincorporated communities within Fresno County in which community services are provided via a Community Services District. These Districts are governed by an independent Board of Directors and, depending on the number of service connections, may be regulated by the State of California. In some cases, the systems in these communities (Biola, Friant, Del Rey) do not have adequate capacity to accommodate additional development without major infrastructure improvements.

- b. Is there available land suitable for urban development or for conversion to residential land use, including underutilized land use and opportunities for infill development and increased residential densities, within your jurisdiction and sphere of influence? If not, indicate why. [Note: In developing the RHNA Plan, COG 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.]

There are some unincorporated communities within Fresno County that contain vacant land suitable for infill development. Fresno County is in the process of preparing updates for all the Community Plans and will be evaluating these communities with respect to opportunities for infill development, increased density, and mixed-use development.

In addition, there are areas within the County (County Islands) which are developed with very low density residential development on oversized lots. These oversized lots could present opportunities for infill development and increased residential densities.

- c. Are there lands within your jurisdiction that are 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? If so, please identify.

Within Fresno County there are vast areas protected under the State Williamson Act Program for agricultural land conservation. These parcels are either under Williamson Act Contracts or Farmland Security Zones. These parcels are located throughout the County totaling 1,529,265 acres and are typically zoned AE (Exclusive Agriculture), which limits land use generally to agricultural uses. In addition, the existence of the Contract further limits the land uses permitted on these parcels to strictly agricultural and uses that are closely incidental to the agricultural use.

There are also lands within Fresno County (foothill/mountain areas) that are under Federal Jurisdiction (National Parks) which would preclude certain residential development. In addition, these are lands designated as open space in the vicinity of rivers (Kings and San Joaquin).

- d. **For Fresno County only.** Are there county policies to preserve prime agricultural land within the unincorporated area? If so, what are they?

The Fresno County General Plan contains visions, goals and policies specifically intended to protect agricultural land and direct growth away from these lands. The Vision Statement of the General Plan includes the following language:

"The County sees its primary role to be the protector of prime agricultural lands, open space, recreational opportunities, and environmental quality, and the coordinator of countywide efforts to promote economic development."

"The plan seeks to protect its productive agricultural land as the county's most valuable natural resource and the historical basis of its economy through directing new urban growth to cities and existing unincorporated communities and by limiting the encroachment of incompatible development upon agricultural areas."

The Plan's Vision Statement further states:

"The plan promotes compact growth by directing most new urban development to incorporated cities and existing urban communities that already have the infrastructure to accommodate such growth. This plan assumes over 93 percent of new population growth and new job growth will occur within incorporated city spheres of influence and seven percent would occur in unincorporated areas (see Appendix A). Accordingly, this plan prohibits designation of new areas as Planned Rural Community and restricts the designation of

new areas for rural residential development while allowing for the orderly development of existing rural residential areas.”

The Goal of the County’s Agricultural Land Use Element (Goal LU-A) States:

“To promote the long-term conservation of productive and potentially-productive agricultural lands and to accommodate agricultural-support services and agriculturally-related activities that support the viability of agriculture and further the County’s economic development goals.”

With regard to the specific policies that promote/require the protection of agricultural land, below are a listing of the relevant polices and text that seek to preserve agricultural land. Policies that prevent division or the further division of agricultural land preserve those lands by limiting the creation of parcels that are smaller than needed to provide for a viable agricultural use and, once divided, could be developed with residences that conflict with farming practices (or vise-versa). Also below, there are policies that encourage commitment to the Williamson Act program which preserves agricultural land.

Policy LU-A.1 *“The County shall maintain agriculturally-designated areas for agriculture use and shall direct urban growth away from valuable agricultural lands to cities, unincorporated communities, and other areas planned for such development where public facilities and infrastructure are available.”*

Policy LU-A.6 *“The County shall maintain twenty (20) acres as the minimum permitted parcel size in areas designated Agriculture, except as provided in Policies LU-A.9, LUA.10, and LU-A.11. The County may require parcel sizes larger than twenty (20) acres based on zoning, local agricultural conditions, and to help ensure the viability of agricultural operations.”*

Policy LU-A.7 *“The County shall generally deny requests to create parcels less than the minimum size specified in Policy LU-A.6 based on concerns that these parcels are less viable economic farming units, and that the resultant increase in residential density increases the potential for conflict with normal agricultural practices on adjacent parcels. Evidence that the affected parcel may be an uneconomic farming unit due to its current size, soil conditions, or other factors shall not alone be considered a sufficient basis to grant an exception. The decision-making body shall consider the negative incremental and cumulative effects such land divisions have on the agricultural community.”*

Policy LU-A.12 *“In adopting land uses policies, regulations and programs, the County shall seek to protect agricultural activities from encroachment of incompatible land uses.”*

Policy LU-A.16 *"The County should consider the use of agricultural land preservation programs that improve the competitive capabilities of farms and ranches, thereby ensuring long-term conservation of viable agricultural operations. Examples of programs to be considered should include: land trusts; conservation easements; dedication incentives; new and continued Williamson Act contracts; Farmland Security Act contracts; the California Farmland Conservancy Program Fund; agricultural education programs; zoning regulations; agricultural mitigation fee program; urban growth boundaries; transfer of development rights; purchase of development rights; and agricultural buffer policies."*

Policy LU-A.17 *"The County shall accept California Land Conservation contracts on all designated agricultural land subject to location, acreage, and use limitations established by the County."*

3. **For Fresno COG only.** What is the distribution of household growth assumed for purposes of a comparable period of regional transportation plans and what are the opportunities to maximize the use of public transportation and existing transportation infrastructure?

4. Do you believe the market demand for housing in your jurisdiction, relative to the market demand for housing in other Fresno County jurisdictions, will change significantly between January 1, 2006 and July 1, 2013? If so, explain.

Permit activity for Fresno County has been on the rise since the mid 1990's and has not slowed. As additional residents are expected to arrive in Fresno County, it is anticipated that the demand for housing will increase. As indicated above, the County policies direct new urban development to the incorporated communities (cities). Housing demand for development within Fresno County has not typically included the very large urban subdivision projects, with some exceptions. It is anticipated however that as those areas within the cities and cities' spheres of influence develop, pressure will be placed on the surrounding unincorporated areas including the unincorporated communities which contain areas designated for urban development.

5. **For Fresno County only.** Do agreements exist between the county and the cities in the county to direct growth toward incorporated areas of the county? If so, please explain.

As indicated above, Fresno County's policies direct growth to cities (estimated 93%). Fresno County has a Memorandum of Understanding (MOU) with all incorporated jurisdictions within Fresno County (15). These MOU's stipulate and recognize the County General Plan Goals and Policies that direct growth to the

cities. Specifically, Goal LU-G is noted in the MOU's. Also, listed below are other Policies from the County General Plan that direct growth to the cities.

Goal LU-G "To direct urban development within city spheres of influence to existing incorporated cities and to ensure that all development in city fringe areas is well planned and adequately served by necessary public facilities and infrastructure and furthers countywide economic development goals."

Policy LU-G.1 "The County acknowledges that the cities have primary responsibility for planning within their LAFCO-adopted spheres of influence and are responsible for urban development and the provision of urban services within their spheres of influence."

Policy LU-G.7 "Within the spheres of influence and two (2) miles beyond, the County shall promote consultation between the cities and the County at the staff level in the early stages of preparing general plan amendments and other policy changes that may impact growth or the provision of urban services. Staff consultations, particularly concerning community plans, shall provide for meaningful participation in the policy formulation process and shall seek resolution of issues prior to presentation to the decision-making bodies."

Policy LU-G.14 "The County shall not approve any discretionary permit for new urban development within a city's sphere of influence unless the development proposal has first been referred to the city for consideration of possible annexation pursuant to the policies of this section and provisions of any applicable city/county memorandum of understanding."

6. **For Housing Authorities of Fresno only.** Has there been a loss of units contained in assisted housing developments that changed to non-low-income use through mortgage prepayment, subsidy contract expirations, or termination of use restrictions.

7. Do you think that high housing costs are more of a burden in your jurisdiction than they are in other jurisdictions in Fresno County?

No more than in any other jurisdiction within Fresno County.

8. Do you think that the housing needs of farmworkers are a more serious issue in your jurisdiction than in the other jurisdictions in Fresno County.

While there are provisions in the Fresno County Zoning Ordinance as well as recent legislation that provides for more flexible opportunities for farm-worker housing, as previously discussed, Fresno County provides a disproportionate share of farm-worker housing when compared to other jurisdictions with Fresno

County. According to the County's adopted Housing Element, it is estimated that, during the peak harvest months of April through October, the farm labor work force in the County more than doubles which further constricts the already strained housing supply and basic community services. .

Due to low wages and periods of unemployment, it is not uncommon to find farm-workers and their families living in extremely overcrowded conditions. Affordable housing is often lacking, so several families may live together in one house in order to share expenses. In addition to the general lack of affordable housing, another factor contributing to the housing shortage for farm-workers is the difficulty in renting housing with temporary lease periods which is the type housing needed based of the nature/duration of farm labor.

Based on these factors, additional affordable housing specifically designed for farm-worker households is needed in Fresno County and given the seasonal influx of farm-workers, farm-worker housing needs to be developed in enough housing to accommodate the peak demand. Therefore, addressing farm-worker housing is a more serious issue for Fresno County than in other jurisdictions in Fresno County.

9. Are there any other factors which in your view should be incorporated into the methodology that allocates regional housing needs to the individual jurisdictions?

As a County, Fresno County directs growth to the incorporated cities and urbanized unincorporated communities (noting that the majority of growth is occurring in cities – within the current Spheres of Influence). As such, allocations for Fresno County should take into account that it is the County's primary focus to protect agricultural land and not develop housing. Fresno County recommends that as the housing allocations are being developed, consideration be given to the County's share to reflect development in the expanding urban areas located within the various Cities' Spheres of Influence.

BEFORE THE
COUNCIL OF FRESNO COUNTY GOVERNMENTS
RESOLUTION NO. 2007-49

In the Matter of:

FRESNO COUNTY REGIONAL
HOUSING NEEDS ALLOCATION PLAN)

RESOLUTION OF APPROVAL
OF THE 2007 FRESNO COUNTY
REGIONAL HOUSING NEEDS
ALLOCATION PLAN

WHEREAS, cities and counties are required by State law to prepare and adopt a general plan with a housing element that addresses the need to attain State housing goals; and

WHEREAS, State law requires documentation of existing and projected housing needs for all income levels; and

WHEREAS, Government Code Section 65580 directs each city and county to address the housing needs of all segments of the community in their general plan's housing element; and

WHEREAS, existing and projected needs are to include the localities share of the regional housing need in accordance with Section 65584; and

WHEREAS, Section 65584 of the Government Code also directs councils of governments to prepare regional housing needs plans; and

WHEREAS, Section 65584 also sets forth State statutory requirements for councils of governments and requires that regional housing needs determinations make allocations specific to jurisdictions, including consideration of housing needs of all income levels; and

WHEREAS, State law requires that regional housing needs determinations seek to avoid further impaction of localities with relatively high proportions of lower income households.

NOW, THEREFORE, BE IT RESOLVED, that the 2007 Fresno County Regional Housing Needs Allocation Plan responds to State guidelines by identifying:

1. The housing needs of persons at all income levels within the areas significantly affected by jurisdictions within the Fresno County Planning Area;
2. Existing and projected housing need; and
3. A January 1, 2006 to June 30, 2013 time frame consistent with the statutory schedule.

BE IT FURTHER RESOLVED, that the Council of Fresno County Governments hereby approves the 2007 Fresno County Regional Housing Needs Allocation Plan as it meets the requirements of the State of California Housing Law for Regional Housing Plans.

THE FOREGOING RESOLUTION was passed and adopted by the Council of Fresno County Governments this 29th day of November, 2007.

AYES: Clovis, Firebaugh, Fowler, Fresno, Kerman, Kingsburg, Mendota, Orange Cove, Reedley, San Joaquin, Sanger, Selma and Fresno County

NOES: None

ABSTAIN: None

ABSENT: Coalinga, Huron and Farlier

ATTEST:

Signed:


Trinidad M. Rodriguez, Chairman

I hereby certify that the foregoing is a true copy of a resolution of the Council of Fresno County Governments duly adopted at a regular meeting thereof held on the 29th day of November, 2007.

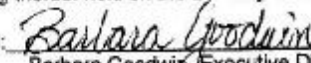
Signed: 
Barbara Goodwin, Executive Director

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Chapter 1

INTRODUCTION

Each city and county within the State of California is required to prepare and adopt a general plan that functions as a blueprint for the physical development of its jurisdiction. The general plan is a policy tool containing a structured set of goals and policies used by local policy makers to direct growth.

The housing element has been a required element of the general plan since 1969. Its purpose is to address the manner in which local jurisdictions attain State housing goals, the most important of which is that “the availability of housing is of vital statewide importance, and the early attainment of decent housing and a suitable living environment for every California family is a priority of the highest order.” Housing elements must identify existing and projected housing needs of all income levels, resources available to meet those needs, existing constraints, and quantifiable objectives for the construction, conservation and rehabilitation of housing units. A housing program to implement local objectives must also be identified.

State Housing Element Law (Article 10.6 of the Government Code), Section 65584 in particular, requires that existing and projected housing needs of a jurisdiction are to include the jurisdiction’s share of the regional housing need. Councils of governments are mandated to prepare regional housing needs allocation plans that determine housing allocations specific to jurisdictions, including consideration of the housing needs of all income levels. Furthermore, consideration of housing needs of all income levels and subsequent housing allocations must seek to reduce the concentration of lower income households in cities or counties that are impacted by disproportionately high proportions of lower income households.

Numerous criteria must be taken into consideration when determining a jurisdiction’s share of the regional housing need. These criteria include the market demand for housing, employment opportunities, availability of suitable development sites, public facilities, commuting patterns, type and tenure of housing need, and the housing needs of farm workers.

Fresno COG staff developed a written survey of all local jurisdictions to assist it with this task. The survey questions were taken directly from statute. None of the information received in response to the survey was used as a basis for reducing the total housing need established for Fresno County. Information from the survey will be particularly helpful during the negotiation period, should it be necessary, to determine the final distribution of regional housing need among various agencies. A copy of the survey is included in the Appendix.

The State Department of Housing and Community Development (HCD) has several roles in the regional housing needs allocation process. Section 65584 requires HCD to allocate shares of statewide housing need, by income category, to councils of government, including the Council of Fresno County Governments (Fresno COG), and advises councils of government in the preparation of the regional housing needs allocation plan. Councils of government are required to then determine the distribution of the housing need within the region.

While housing elements must reflect the shared responsibility among local governments for accommodating regional housing needs and the housing needs of all economic levels, the actual distribution of housing needs to local jurisdictions represents a planning objective. The State recognizes that the total housing needs identified may exceed available resources and a community’s ability to satisfy these needs and that, in carrying out this responsibility, each local government also has the responsibility

to consider economic, environmental, and fiscal factors and community goals set forth in its general plan. It is important to make progress during the planning period to achieve the housing need, not necessarily that the total housing need be achieved. It is also important to recognize that addressing regional housing needs requires local jurisdictions to cooperate with other local jurisdictions in the region.

Census data from 2000, State Department of Finance (DOF) data, HCD data, and Fresno COG calculations are the basis for all housing projections prepared for Fresno County's 2007 Regional Housing Needs Allocation (RHNA) Plan. The planning period for the Plan extends from January 1, 2006 to June 30, 2013.

STUDY APPROACH

A team of local planning and housing experts, formed to assist staff with this project, met on October 4, 2006, and recommended to the Fresno COG Policy Advisory Committee and Policy Board that the methodology utilized to develop the previous Fresno County 2001 RHNA Plan and even earlier Fresno County 1990 RHNA Plan also be used to develop the Fresno County 2007 RHNA Plan. The recommendation was based on the following methodology attributes:

1. The methodology was successfully used in the development of the 1990 and 2001 RHNA Plans and was acceptable to local jurisdictions in Fresno County and HCD. In addition, the methodology allows for the ability to make manual adjustments to a jurisdiction's allocation of the regional housing construction need. Recent changes to statute require that local jurisdictions be surveyed to gather information regarding local government infrastructure, housing market, and other local conditions that could influence the distribution of the regional housing need. Information from the survey will be particularly helpful during negotiations, if necessary, regarding potential manual adjustments. Negotiations were required and were concluded successfully for both the 1990 and 2001 RHNA Plans.
2. The methodology is acceptable to HCD for use in Fresno County's 2007 RHNA Plan.
3. The methodology is relatively straightforward to understand and implement, an important factor to achieve support for the Plan.
4. The methodology reflects a city-centered and balanced development pattern that is substantially consistent with local agency general plans, including Fresno County's General Plan, adopted on October 3, 2000.

Subsequent to a 60-day public comment period, the Fresno COG Policy Board held a duly noticed public hearing on February 22, 2007. At the conclusion of the public hearing, the Policy Board approved Resolution No. 2007-07 adopting the methodology for use in the development of the Fresno County 2007 Regional Housing Needs Allocation Plan. A copy of the Resolution is included in the appendix.

The Fresno County 2007 RHNA Plan responds to State statute and guidelines by identifying the following:

1. The existing and projected housing needs of the Fresno County region.
2. The housing needs of persons of all income levels within the area significantly affected by a jurisdiction's general plan.

3. The distribution of housing needs to reduce the concentration of lower income households in cities which already have disproportionately high proportions of lower income households.
4. A January 1, 2006 to June 30, 2013 planning time frame (7 ½ years) consistent with the statutory schedule.

The Plan includes the following two major components:

1. Existing Housing Needs - Information in the Plan for the base year January 1, 2006 includes:
 - a. Total households by household income and jurisdictional area
 - b. Vacancies
2. Projected Housing Needs: - Two categories of projected housing need, by jurisdictional area, are included in the Plan:
 - a. Projected households by household income groups for June 30, 2013
 - b. Projected housing construction need for the 7 ½ year period extending from January 1, 2006 to June 30, 2013, derived by the Fresno COG from the household projections with allowances for vacant units and normal market removals

The general process used to develop the Plan is outlined below. The completion of tasks one to seven resulted in the development of the draft Fresno County 2007 Regional Housing Needs Allocation Plan. Tasks eight and nine summarize the review process prior to final Plan approval.

Task One – Assemble Materials and Data

Approach

One of the earliest considerations in the development of the Fresno County 2007 Regional Housing Needs Allocation Plan is the determination of the housing construction need figure for all of Fresno County for the planning period extending from January 1, 2006 to June 30, 2013. The State Department of Housing and Community Development (HCD), in consultation with individual COGs, is required to determine the projected need for housing in each region. This regional housing construction need figure is established for planning purposes and statutes recognize that future housing production may not equal the regional housing construction need. The methodology used by HCD to determine the housing construction need for Fresno County includes projected population and household formation rates (or headship rates), vacancy rates and housing replacement needs. During the consultation phase between Fresno COG and HCD, the housing construction need figure for Fresno County was reduced from HCD's original proposal of 56,762 units to 52,142 units, a reduction of 4,620 units or 8.14%. This reduction occurred because HCD agreed with COG staff analysis that the trend of declining headship rates (i.e. household formation rates) between 1990 and 2000 ought to be continued and applied to projected 2013 population. This resulted in lower household growth (and therefore a lower housing construction need) than projected by HCD, which kept headship rates the same in 2013 as in 2000 (i.e. no decline). This figure assumes a .09 percent annual replacement rate for Fresno County, as identified by HCD. The 52,142 unit figure used in this 2007 RHNA Plan compares to a 34,773 unit figure used in the 2001 RHNA Plan. On December 14, 2006, the Fresno COG Policy Board approved the use of this figure in the development of the 2007 RHNA Plan.

HCD also provided estimates of the percentage of households in each of four income groups; Very Low Income, Other Low Income, Moderate Income, and Above Moderate Income. Income group data are

used in the Plan to determine local jurisdiction shares in the provision of housing for low-income households. The income category allocation is calculated by multiplying total housing construction need by the proportion of households in each income category based on Fresno County Census 2000 median income and income definitions. Income group percentages used in the 2001 RHNA Plan were 25% very low, 17% low, 21% moderate and 37% above-moderate. Percentages used in the 2007 RHNA Plan are, respectively, 23.8%, 16.2%, 18.1%, and 41.9%. A letter, including attachments, from HCD dated September 8, 2006, establishing Fresno County's Regional Housing Needs Determination and an explanation for that determination, including a breakdown of the Regional Housing Needs Determination by income category, is included in the appendix.

Accomplishments

Assembled the following information:

1. 2000 U.S. Census data
 - a. Household income distribution data
 - b. Complete vacant unit data (for sale, for rent, and other vacant, including seasonal and migratory unit data)
2. State Department of Finance yearly estimates of population and households
3. Data for Fresno County identifying housing unit construction and total housing stock

Task Two – Review the Regional Profile

Approach

Fresno COG staff reviewed the demographic, geographic, economic and social characteristics of the cities and county.

Accomplishments

1. Analyzed regional changes in the last six years.
2. Reviewed previous growth assumptions relative to new analysis.

Task Three – Reevaluate Housing Market Areas

Approach

Housing market areas are used throughout the Plan in the gathering, analysis, and presentation of data. For this reason, the boundaries of the market areas are drawn along census tract boundaries. The Fresno County 2001 Regional Housing Needs Allocation Plan divided the Fresno County region into five housing market areas (a reduction from the seven housing market areas used in the earlier 1984 and 1990 RHNA Plans) as follows: Fresno-Clovis Metropolitan Area (FCMA), East Valley, Westside North, Westside South, and Sierra Nevada. These areas were considered to be subregionally significant areas within the County.

It is not mandatory that the 2007 RHNA Plan retain the exact same market areas that were used in the earlier plans. In defining market areas, there are two concepts that must be kept in mind. First, market

areas should not divide developed areas. Second, market areas should define subregions in which there is an interaction between employment opportunities and housing opportunities.

The 2001 RHNA Plan determined that since the development of the 1990 Plan there had been changes in the region that warranted a reevaluation of the market areas. Commuting trips had become generally longer and economic relationships had been formed among Westside cities and Southeast cities, in particular the formation since 1990 of the Five-Cities Economic Development Authority (Parlier, Selma, Fowler, Sanger, and Reedley) and the I-5 Business Development Corridor (Firebaugh, Mendota, San Joaquin, and Kerman). This reevaluation resulted in a decrease in the number of housing market areas from seven to five.

The team of local planning and housing experts formed to assist Fresno COG staff with this project reviewed the market areas used in the 2001 RHNA Plan and recommended their use in the 2007 RHNA Plan. The team could not identify any significant trends since the 2001 Plan that would result in a change in the number of or reconfiguration of housing market areas. Indeed, the economic relationships among cities that had formed during the 1990s were still intact and commutes remained long. On February 22, 2007, the COG Board approved Resolution No. 2007-07 affirming the validity of the five market areas utilized in the development of the 2001 RHNA Plan for use in the 2007 RHNA Plan.

Regional Market Areas

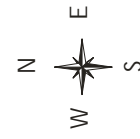
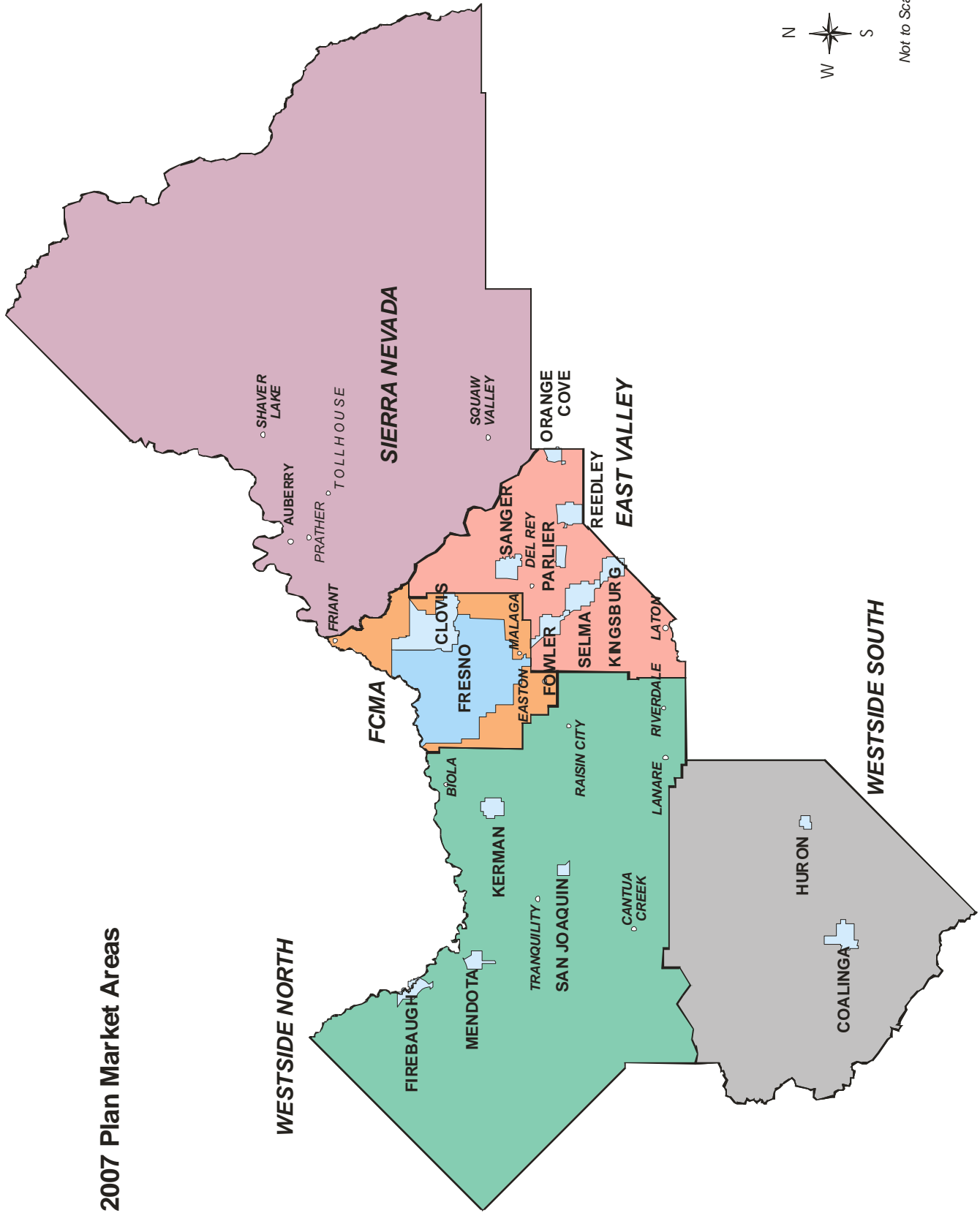
1. **Fresno-Clovis Metropolitan Area (FCMA):** The FCMA market area is comprised of the cities of Fresno and Clovis; the unincorporated communities of Easton and Friant; several unincorporated neighborhoods including Fig Garden, Malaga, and Sunnyside; and, remaining unincorporated area. The geographic boundary of the FCMA generally extends from the San Joaquin River on the north, Grantland Avenue on the west, McCall Avenue on the east and South Avenue on the south. As the largest metropolitan area in the San Joaquin Valley, the FCMA is a significant center of employment and residential opportunities.
2. **Westside North:** The Westside North market area is comprised of the cities of Kerman, Firebaugh, Mendota, and San Joaquin; the unincorporated communities of Tranquility, Biola, Caruthers, Lanare, Laton and Riverdale; and, remaining unincorporated area. The area extends from the eastern slope of the Coast Range to the western boundary of the FCMA and, south of the FCMA, to a point just east of and parallel to SR-41. The Valley portion is largely agricultural while the Coast Range portion is used for cattle grazing, mining, recreation, and wildlife habitat.
3. **Westside South:** The Westside South market area is comprised of the cities of Coalinga and Huron and unincorporated area. The area extends from the eastern slope of the Coast Range to the Fresno and Kings Counties boundary. The primary economic activities of this market area are similar to those in the Westside North market area.
4. **East Valley:** The East Valley market area is comprised of the cities of Orange Cove, Parlier, Reedley, Sanger, Fowler, Kingsburg and Selma; the unincorporated community of Del Rey; and, remaining unincorporated area. The area extends southeastwardly from the FCMA between a point just east of and parallel to SR-41 and the Friant-Kern Canal. The economic base of this market area is agriculture, although commercial and industrial activities have become increasingly important.
5. **Sierra Nevada:** The Sierra Nevada market area is comprised of the unincorporated communities of Auberry, Big Creek and Shaver Lake and the remaining unincorporated area.

There are no cities in this market area. The area extends easterly of the Friant-Kern Canal and comprises the western slope of the Sierra Nevada Mountain Range. The unincorporated communities function as service centers for the various recreational sites in the area and the farming, cattle grazing, and lumbering activities that occur.

Accomplishments

1. Analyzed demographic and economic changes of market areas.
2. Reassessed market area boundaries.

2007 Plan Market Areas



Not to Scale

Task 4 – Determine Low-Income Impacted Jurisdictions

Approach

Utilizing the 2000 U.S. Census and State Department of Finance population estimates, projections, and other data, the Fresno COG calculated the number and percentage of households in each of the four income groups. The sum of the calculations for each of the local jurisdictions is controlled by the regional total. The Plan groups the households of each jurisdiction into the four household income groups defined by Section 6932 of the California Administrative Code. The following is a brief description of each of these income groups.

<u>Very Low Income</u>	Income not exceeding 50 percent of the median family income of the County
<u>Other Low Income</u>	Income between 50 percent and 80 percent of the median family income of the County
<u>Moderate Income</u>	Income between 80 percent and 120 percent of the median family income of the County
<u>Above Moderate Income</u>	Income above 120 percent of the median family income of the County

The following method was utilized to arrive at the percentage of households in each income group in each local jurisdiction:

1. The maximum county income associated with each income group was determined.
2. Maximum incomes were used to determine the number and percent of each jurisdiction's households whose income is less than or equal to the maximum income of each income group.
3. Each city's households and each market area's unincorporated area households were aggregated into the four income groups.

Accomplishments

1. Utilized 2000 U.S. Census income data to reflect new income group estimates provided by the Department of Housing and Community Development.
2. Calculated the number and percentage of households by income group for each jurisdiction.
3. Reviewed each jurisdiction's share of households by income group to identify jurisdictions with high percentages of low-income households.

Task 5 – Allocate Household Growth

Approach

U. S. Census data for 2000, State Department of Finance population projections, and State Department of Housing and Community Development housing factors are the basis for all housing estimates and projections prepared for the 2007 RHNA Plan. January 1, 2006 is the beginning date of the Plan for all housing projections. June 30, 2013 is the ending date of the Plan. Household estimates are prepared for

both of these dates by applying 2000 housing characteristics to the household estimates using a trend line method. This approach involves determining the percentage of past regional household growth which is accounted for by each jurisdiction and applying these percentages to the projected household growth for the region.

Prior to 1990 there had occurred an historic decline in the population of the unincorporated area of Fresno County, with regard to both the overall ratio of the unincorporated to incorporated population and a real decline in actual numbers. For example, the 1990 RHNA Plan indicated the number of unincorporated households within the FCMA market area actually declined by 11,733 households between 1980 and 1989, or from 27.42 percent of total FCMA market area households in 1980 to 14.75 percent in 1989. And while the percentage change during the same period for the other market areas was generally positive (the Westside South market area being the exception), it was less than ½ of 1 percent.

Two factors in particular contributed to this declining unincorporated population: County policy relative to urban development in unincorporated areas and aggressive city annexation activities, particularly annexation of inhabited areas by the City of Fresno, between 1980 and 1989.

The County first adopted a goal in 1976 that urban development within a city's sphere of influence is to be directed to that city. In March of 1983, the cities of Fresno and Clovis, and the County of Fresno adopted a joint resolution reaffirming this goal. The goal has since been reaffirmed, most recently in the County's current General Plan "to ensure that all development in city fringe areas is well planned and adequately served by necessary public facilities and infrastructure and furthers countywide economic development goals."

In the 1990 RHNA Plan, the growth trend for market areas and communities from 1980 to 1989 was applied to the planning cycle from 1989 to 1996, except for the FCMA market area. In order to slow the overall estimate of the continued decline of unincorporated County households as predicted by the trend line method, a manual adjustment to the FCMA unincorporated area was included in the estimates. This manual adjustment was based on a determination that "institutional barriers" were expected to reduce significantly the rate of inhabited annexation activity during the 1989-1996 planning period. This determination turned out to be correct as the number of unincorporated households within the FCMA market area in 1996, as projected in the 1990 RHNA Plan with the manual adjustment, was similar to the actual number.

The 2001 RHNA Plan, unlike the 1990 RHNA Plan, did not initially provide for a manual adjustment to the FCMA unincorporated households. The reason for this was that the extent of inhabited annexation activity between January 1, 2000 and June 30, 2007 was expected to remain pretty much as it was between 1990 and 2000, which is to say virtually nonexistent. Nevertheless, within the FCMA market area and within the County as a whole, the percentage of unincorporated households compared to total market area and total County households, was projected to continue to decline, although only slightly, during the 7 ½ year planning period, while the actual number of unincorporated households was projected to increase somewhat.

Table 1
Population Estimates and Projections by Jurisdiction
2000-2013

	April 1, 2000	January 1, 2006	June 30, 2013
Clovis	68,516	89,924	111,276
Coalinga	15,798	17,147	18,492
Firebaugh	5,743	6,710	7,674
Fowler	4,046	4,855	5,662
Fresno	427,652	471,481	515,196
Huron	6,310	7,344	8,375
Kerman	8,548	12,633	16,707
Kingsburg	9,231	11,246	13,256
Mendota	7,890	8,777	9,662
Orange Cove	7,722	9,639	11,551
Parlier	11,145	12,895	14,640
Reedley	20,756	23,341	25,919
Sanger	18,931	23,322	27,702
San Joaquin	3,270	3,746	4,221
Selma	19,444	22,931	26,409
Unincorp.	164,405	173,526	182,623
Total County	799,407	899,517	999,366

Sources:

1. 2000 estimates are from the 2000 U.S. Census
2. 2006 estimates for each jurisdiction were prepared by the State of California Department of Finance.
3. 2013 projection for the County was prepared by the State of California Department of Finance, and assume the same jurisdictional shares of population growth for 2006-2013 as occurred for 2000-06.

Accomplishments

1. Evaluated factors that might disrupt the validity of the trend line method for determining growth estimates.
2. Determined the total number of households expected to be generated by each jurisdiction.
3. Developed statistical tables related to this task.

Task 6 – Allocate Households by Income Group

Approach

Section 65584 of the Government Code states that the distribution of regional housing needs shall seek to reduce the concentration of lower-income households in cities that are impacted by disproportionately

high proportions of lower-income households. This, therefore, is an important objective of the 2007 RHNA Plan.

Accomplishments

1. Distributed the Countywide housing need to each income group in each jurisdiction in each market area.
2. Reviewed distribution to insure that no jurisdiction with a relatively high proportion of low-income housing has its ratio of low-income housing increased further.
3. Reviewed jurisdictional and market area allocations to insure that the sum of the allocations for each income group is equal to the regional total for each income group.

Task 7 – Calculate New Housing Construction Need by Jurisdiction

Approach

New housing construction needed to provide for the anticipated growth in households must be calculated for each local jurisdiction and market area for the planning period extending from January 1, 2006 to July 1, 2013. Factors utilized in the calculations include existing housing units, projected number of households, vacancy factors, and housing removals.

Accomplishments

1. Reviewed, modified, and utilized State recommended formula.
2. Calculated new construction need for each jurisdiction and market area.
3. Updated tables related to construction need.

Task 8 – Initiate Local Revision Process

Approach

The receipt by each local government in Fresno County of the distribution of the draft allocation of regional housing needs (Draft 2007 Fresno County Regional Housing Needs Allocation Plan) began the 60-day period whereby a local government may request from the Fresno COG a revision of its share of the regional housing need. A request for a revised share shall be made in accordance with the factors described in paragraphs (1) to (9), inclusive, of subdivision (d) of Section 65584.04. Further, the request shall be based upon comparable data available for all affected jurisdictions and accepted planning methodology, and supported by adequate documentation. The draft allocation was also submitted to HCD for its review of the consistency between the existing and projected housing need identified in the Plan and the statewide housing need.

Accomplishments

1. Distribution of the draft allocation of regional housing needs (Draft 2007 RHNA Plan) to local governments for the purpose of initiating the 60-day revision period.

Task 9 – Approve the Final 2007 Fresno County Regional Housing Needs Allocation Plan

Approach

Within 60 days after a city(ies) or the county requested from the Fresno COG a revision of its share of the regional housing need, the Fresno COG shall accept the proposed revision, modify its earlier determination, or indicate, based upon the information and methodology described in Section 65584.04, why the proposed revision is inconsistent with the regional housing need.

Accomplishments

1. Public Hearing.
2. Approval of the 2007 Fresno County Regional Housing Needs Allocation Plan.

FARMWORKER HOUSING NEEDS

Characteristics of Farmworkers

Government Code Section 65584 requires the regional housing needs allocation plan to consider the housing needs of farmworkers. However, any discussion of farmworkers and farmworkers housing must appropriately begin with an understanding of who farmworkers are and the characteristics they share in common. Unfortunately, there is a serious deficiency of data about the farmworker population including that this population is generally undercounted by the U.S. Census. For example, a number of farmworkers live in unofficial dwellings, which are often missed by the Census Bureau. A recent health study in the City of Parlier in Fresno County indicated about 28 percent of farmworkers were not counted by the U.S. Census because they lived in unofficial dwellings.

Other characteristics of migrant and seasonal farmworkers also make it difficult to collect data. They often do not have a fixed address and work intermittently in various agricultural and non-agricultural occupations during a single year, with only casual employer-employee links. Many live in rural, often remote areas. Many have limited English-speaking abilities, relatively low educational levels and are unfamiliar with and even distrustful of government agencies and agents, including those who work for the Census Bureau. Inaccurate data makes it difficult to determine the seriousness of housing and other needs and the types of services required by this population.

While current information on farmworkers is limited, data from the census, including the March 1997 Current Population Survey, reveals the following. Farmworkers numbered 342,102 in California as of March, 1997, are overwhelmingly Latinos (78 percent), and are mostly males (72 percent). Approximately 55 percent of the state's agricultural workers were employed in the San Joaquin Valley, which includes Fresno County, in 1996. Farmworkers have the lowest family income of any occupation surveyed by the Census Bureau and the highest poverty rate of any surveyed occupation. Farmworkers have the lowest educational attainment and are second from the lowest, after the private housekeeper occupation, in home ownership. Farmworkers have one of the lowest rates of health insurance coverage and are overwhelmingly non-citizens (including legal residents, workers with a permit, or undocumented).

These highlights are more likely to reflect the characteristics of agricultural workers who spend most of the year in the United States. However, as we know, every year around April waves of seasonal agricultural workers come to California. The March Current Population Survey does not wholly capture this population due to the time of year it is conducted. The Average Annual Wage and Salary

Employment in California Agriculture was 408,000 in the year 2000, but the total number of individuals employed for wages on California farms is about twice this level, i.e. 800,000 to 900,000, based on late 1980s studies of counts of the SSNs reported by farm employers to the Economic Development Department.

California is the nation's largest agricultural state, producing more than 250 different crops valued at nearly \$30 billion. Fresno County is the number one county in the State and Nation in terms of value of agricultural production. California and Fresno farmers have been changing their crops to respond to consumer demand, producing more fresh vegetables, fruits and nuts. These high value-added crops require more labor. Also, there has been an ongoing change from many smaller farms to fewer bigger farms with the ability to provide extended periods of work for farmworkers. These trends along with others are interacting to mean that more farmworkers than ever are working in California and many are working for longer periods of time in one area, some as residents of that area.

Farmworker Housing

Two main factors lie behind the worsening housing shortage for farmworkers: there are more farm workers and many farmers have ceased to provide housing. A shrinking supply with an increasing demand has led to higher prices in rural areas, resulting in housing costs that are high relative to farmworker income. This has led to significant overpaying for housing and overcrowding of housing. The farm work force is changing to include more solo male and unauthorized migrants. Most aim to maximize their savings and are unable or unwilling to pay prevailing rents for temporary housing. Since most farmers do not provide housing, and many publicly owned or managed facilities are restricted to families, the newest and neediest workers usually seek housing in regular rental markets, where several share a housing unit, and some sleep in cars and other unconventional places. Furthermore, about 600,000 unauthorized Mexican men were legalized in 1987-88. During the 1990s, many brought their families to the U.S. and many found nonfarm jobs. Finding housing for these often large families from rural Mexico is difficult. The families are often larger than average and rent housing, but rental units tend to be smaller than average.

The amount of farmworker housing registered with the state has declined dramatically in the last two decades. In 1955, growers registered more than 9,000 facilities to house migrant and seasonal workers. By 1982, only 1,414 employer-owned camps were registered. In 1994, only 900 camps were registered, with a capacity of 21,310 workers. In 1998, according to the Department of Housing and Community Development, there were only 500 farm labor camps registered. Not surprisingly, a 1995 study by the University of California at Davis estimated that 250,000 farmworkers and their family members had inadequate housing, including 90,000 migrant workers and over 160,000 non-migrant seasonal farmworkers. The housing shortage was so severe that many workers were found packed 10 or 12 into trailers and sleeping in garages, tool sheds, caves, fields and parking lots. Consequently, the major farmworker housing policy issue has shifted from regulating employer-provided housing to direct provision and/or management of farm worker housing.

The Fresno Bee on August 18, 1996 ran a lengthy article on the sharp drop in farm farmworker housing in the San Joaquin Valley, the eight county area centered on Fresno that employs half of the California's farmworkers. The article noted neighbors complain about (or sometimes simply fear) workers' behavior, noise, and traffic. Government inspections, regular and deferred maintenance, calls from or regarding tenants during their non-work hours, and liability issues all represent unwanted concerns and cost for growers. Housing facilities that cannot withstand heavy use or are not vandal resistant may be cited for regulatory violations that carry substantial penalties. Even minor violations of the housing code, such as torn window screens, can result in large fines. Consequently, instead of providing workers with on-farm housing subject to federal and state inspection, many farmers are razing their farmworker housing.

As a result, most farmworkers crowd into urban dwellings, including backyard structures and garages, which results in widespread overcrowding, particularly during those times of the year when farmworkers are most in demand. In many cases, workers today spend 25 to 35 percent of their wages on housing and rides to work. Farmworker cities in rural California are growing twice as fast as the state's population, as newly-legalized farm workers bring their families to the U.S. Many of these "overgrown labor camps" are over 50 percent Latino, and some are over 90 percent. It is important to note, however, that some growers and labor contractors have shown renewed interest in housing as an important factor in their ability to attract and retain their best workers.

Many San Joaquin Valley towns have become farmworker service centers, with local residents, for a fee, providing everything from housing and meals to forged work documents, rides to the fields, and check cashing services. In the city of Parlier in Fresno County, the mayor has said that the population expands significantly each summer as workers arrive from Mexico. Migrants rely on friends, relatives or labor contractors to arrange housing. Oftentimes, with so many men sharing apartments, two to four times the normal rent is generated for the landlord. Furthermore, the shortage of temporary housing for farmworkers in rural areas encourages many to commute long distances from the housing that they find. These long commutes can contribute to the air quality problems that exist in Fresno County and the San Joaquin Valley.

The Department of Housing and Community Development reviewed the status of farmworker housing programs in the late 1980s. Five of the thirteen findings from that investigation are as follows:

- A majority of migrant farmworkers who do not live in government-sponsored labor camps live in seriously substandard conditions.
- Substandard housing conditions exist in areas with significant seasonal agricultural production.
- Housing conditions are a major problem for both single migrant workers and migrant families.
- Poor housing hurts migrant children's health, education, and general welfare.
- Local officials vary in their support for housing migrant families.

Employment on California farms has been increasing, as noted above, and shifting from farmers hiring workers themselves to having farm services firms such as farm labor contractors bring workers to farms. Currently, approximately half of the hired worker employment is by farm services firms. This suggests that farm services firms, not just farm operators, should be involved in farm worker housing programs.

Fresno County Farmworkers, Overpayment, and Overcrowding

One indicator of housing cost and affordability is the 40th percentile rent for an area. For example, the HUD Fair Market Rent for the Section 8 Housing Assistance Payments Program of \$517 a month in Fresno County in 2000 means that 40 percent "of standard quality rental housing units" in Fresno County rent for less than \$524 a month, and 60 percent rent for more than \$524 a month. A farmworker family in Fresno County would have to earn \$1,723 a month to spend 30 percent of earnings on housing and afford the Fair Market Rent. However, median family income for farmworker households is \$800 to \$1,200 a month.

As noted earlier, farmworkers have the lowest family income of any occupation surveyed by the Census Bureau and are second from the lowest, after the private housekeeper occupation, in home ownership. Substantial numbers of farmworkers and other low-paid workers are overpaying for housing in Fresno County, particularly the lower one is on the income scale. The higher a household's income, the less likelihood it will be overpaying for housing.

The Housing Authorities of the City and County of Fresno manage 130 housing units for migrant farm workers in Parlier. The complex is owned by the State of California, Office of Migrant Services. In addition, the Housing Authority owns and manages a 64 unit migrant housing complex in Firebaugh. Both complexes are occupied six months out of the year, from April through October. Migrant farm worker families who want to rent a unit in Firebaugh or Parlier must demonstrate that at least half of their earned income is farm related, they must show evidence of a permanent residence at least 50 miles from the work site, and they must be legal residents of the United States. The cost of managing and maintaining both complexes is subsidized by the State of California, Office of Migrant Services.

Within Fresno County there are 4,630 federally-assisted multifamily housing units, of which 3,156 are Section 8. Of the 4,630 units, 2,460 are units at risk, while 1,401 are low risk of conversion to market rate housing.

The Migrant Health Program periodically seeks to obtain updated information about migrant and seasonal farmworkers, including where they are working and living and what crops are being harvested, in order to more appropriately target limited resources to areas of greatest migrant and seasonal farmworker need. The Migrant and Seasonal Farmworker Enumeration Profiles Final Study for California dated September, 2000 indicates that in Fresno County there were an estimated 113,741 migrant and seasonal farmworkers. Of this number, 52,662 were migrant farmworkers and 61,079 were seasonal farmworkers. The Study further estimates there were 19,353 non-farmworkers in migrant households and 69,309 non-farmworkers in seasonal households, for a total figure of 202,404 migrant and seasonal farmworkers and non-farmworkers in Fresno County.

In this report, a seasonal farmworker is defined as an individual whose principal employment (51 percent of time) is in agriculture on a seasonal basis, who has been so employed within the last twenty-four months. A migrant farmworker meets the same definition but establishes for the purposes of such employment a temporary abode. Included in the scope of the study are individuals engaged in field and orchard agriculture; packing and sorting procedures in food processing; horticultural specialties (including nursery operations, greenhouse activities and crops grown under cover); and reforestation. Excluded from the study are those working with livestock, poultry, and fisheries.

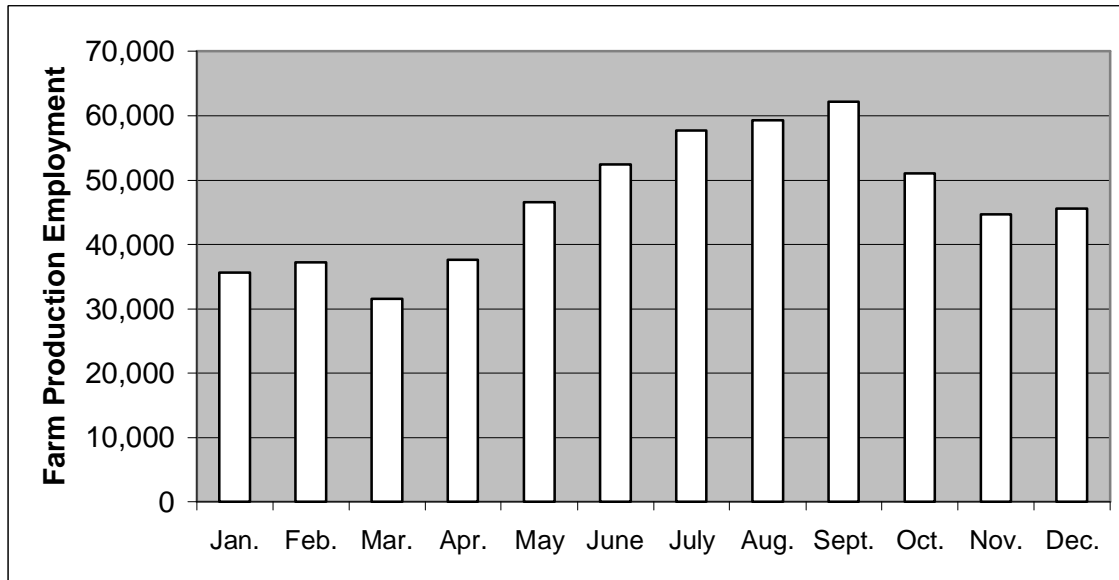
The same Study has also calculated the number of farmworkers that work on a year-round as well as seasonal basis, both for the state as a whole and for individual counties. The Study indicates this figure to be 259,665 farmworkers for Fresno County.

Fresno County is certainly sensitive to the issue of farmworker housing and to the issue of affordable housing in general. Recently, the County of Fresno utilized focus groups to identify and discuss issues of importance for its new general plan. Although not one of the major themes developed from these focus groups, the issue of farmworker housing was raised. Several of the focus groups favored increased availability of farmworker housing, pointing out that many agricultural workers live in crowded conditions in towns distant from the fields in which they work. Other housing issues, particularly the need for affordable housing, were also raised. The County's new general plan was adopted on October 3, 2000.

According to the State of California Employment Development Department (EDD), the number of individuals in Fresno County with an occupation in farm production was 46,800 in 2006. This was 13.4 percent of County workers in all industries. Farm production is the production of crops, plants, vines, trees (excluding forestry), and livestock. Farm production does not include farm services such as soil preparation, crop services, veterinary services, or farm labor and management services. Seasonal and migrant farmworkers are most closely associated with the farm production classification.

The number of employed farmworkers in the County varies from month to month. According to the EDD, the number of farmworkers in 2006 was greatest in September and least in March. The following chart shows the monthly farm production employment for the period January 2006 to December 2006.

Fresno County Farm Production* Employment Year 2006 by Month

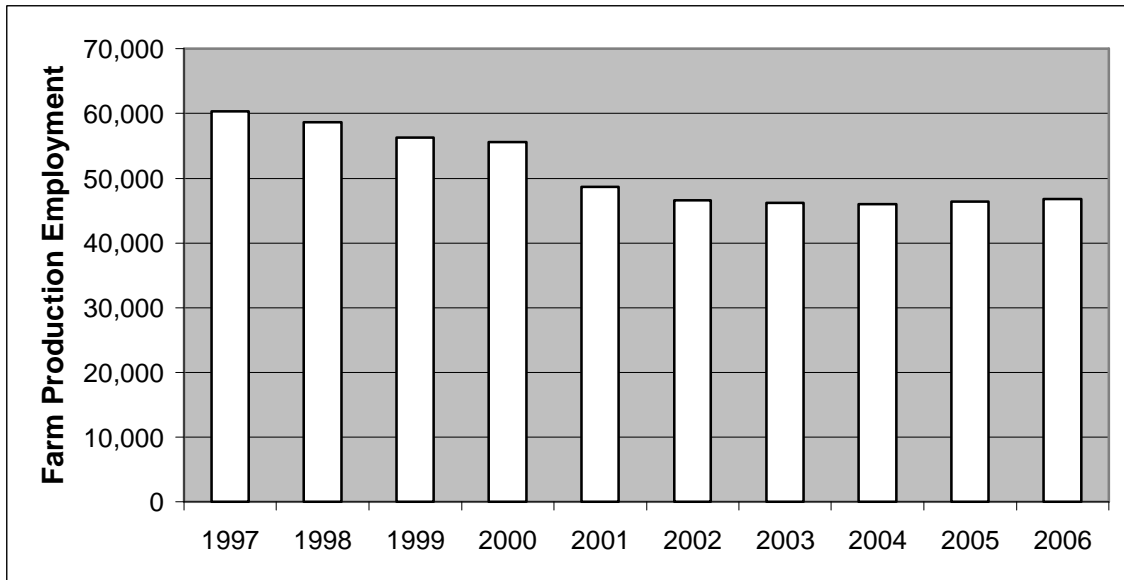


* Farm production is the production of crops, plants, vines, and trees (excluding forestry), and livestock. Farm production does not include farm services such as soil preparation, crop services, veterinary services, or farm labor management services. Seasonal and migrant farmworkers are most closely associated with the farm production classification.

Source: State of California Employment Development Department

In addition to seasonal variability, Fresno County farm production employment also varies on a year to year basis. According to the EDD, during the years 1997 through 2006, average annual farm production employment ranged from a low of 46,000 in 2004 to a high of 60,300 in 1997. This is a difference of 14,300 workers. The average annual farm production employment for this period was 51,160. The following graph illustrates the annual variability of farm production employment for the years 1997 through 2006. The graph clearly illustrates the consistent decline in farm employment from 1997 through 2002, and the stabilization of farm employment from 2002 to 2006.

Fresno County Farm Production* Employment Years 1997-2006



* Farm production is the production of crops, plants, vines, and trees (excluding forestry), and livestock. Farm production does not include farm services such as soil preparation, crop services, veterinary services, or farm labor management services. Seasonal and migrant farmworkers are most closely associated with the farm production classification.

Source: State of California Employment Development Department

Farmworkers are not distributed equally throughout the County. According to the 2000 U.S. Census, the highest concentration of farmworkers was in San Joaquin where 56.0 percent of the labor force was identified as being in farming, forestry, and fishing occupations. Since there is a relatively small forestry industry in Fresno County, and an even smaller fishing industry, these workers in Fresno County cities are assumed to be farmworkers. This is clearly the case for those cities with the highest concentration of farmworkers, including San Joaquin, Huron, Mendota, Orange Cove, Parlier, and Firebaugh. All of these cities are located on the Valley floor a considerable distance, with the possible exception of Orange Cove, from forest resources.

The following table shows the ranking of cities in Fresno County by percent of workers in farming in 2000:

Ranking of Cities in Fresno County
by Percent of Workers in Farming*
Year 2000

Rank	Cities in Fresno County	Percent of Workers in Farming*
1	San Joaquin	56.0%
2	Huron	49.2%
3	Mendota	44.1%
4	Orange Cove	39.9%
5	Parlier	28.6%
6	Firebaugh	25.6%
7	Kerman	21.7%
8	Reedley	18.5%
9	Sanger	13.1%
10	Coalinga	12.3%
11	Selma	11.9%
12	Fowler	6.8%
13	Kingsburg	5.1%
14	Fresno	3.5%
15	Clovis	2.0%

* Includes workers in the farming, forestry, and fisheries classifications. There are a minimal number of Fresno County workers in forestry and fisheries.

Source: 2000 U.S. Census

Overcrowding of housing and overpaying for housing will naturally be more prevalent in those cities that have a higher percentage of workers in farming.

HCD administers more than twenty programs that award loans and grants to local public agencies, private nonprofit and for-profit housing developers, and service providers every year. This money supports the construction, acquisition, rehabilitation and preservation of affordable rental and ownership housing, child care facilities, homeless shelters and transitional housing, public facilities and infrastructure, and the development of jobs for low income workers. The HCD website, www.hcd.ca.gov, includes a Funds Available Calendar that lists current Notices of Funding Availability for HCD's loan and grant programs, including due dates for applications, award dates, and other related information. The HCD website also provides information about non-HCD funding sources, including over 200 State, federal and private sources of assistance by type and geographical availability. Many of these programs and funding sources can be utilized to provide housing for farmworkers.

Chapter 2

HOUSING NEEDS DETERMINATION

The Fresno County 2007 Regional Housing Needs Allocation Plan determines housing needs in Fresno County for the planning period extending from January 1, 2006 to June 30, 2013 and provides a general measure of each local jurisdiction's responsibility for the provision of housing to meet those needs. This Chapter addresses the major components of the Plan, including household projections, basic construction need, the projected housing demand for all income levels, and the allocation of housing need to individual cities and the County unincorporated area.

1. As discussed in Chapter 1, regional household estimates for the January 1, 2006 beginning date and June 30, 2013 ending date of the Plan were calculated by the Fresno COG utilizing State Department of Finance population figures, population to housing unit ratios, and occupancy rate figures for Fresno County. Table 2 provides this information.

Table 2
Population and Household Estimates and Projections
January 1, 2006 - June 30, 2013

Date	Population	Households
Jan. 1, 2006	899,517	278,195
June 30, 2013	999,366	328,273

Source: State of California Department of Finance

2. Table 3 provides the estimated number of regional households in each of the four income groups, for both the beginning date and the ending date of the Plan. The figures are obtained by multiplying the total number of households in columns 2 and 4 (from Table 2) by the percentage allocations in columns 3 and 5 (from HCD). The resulting figures are posted to the corresponding income group in columns 2 and 4. Column 6 provides the growth in households, by income group, for the 7 ½ year planning period.

Table 3
Household Projections by Income Group
January 1, 2006 - June 30, 2013

Income Group	Jan. 1, 2006		June 30, 2013		Change Jan. 1, 2006-June 30, 2013	
	Number ¹	Percent ²	Number ²	Percent ²	Number	Percent
Very Low	66,044	23.74%	77,933	23.74%	11,889	23.74%
Low	45,207	16.25%	53,344	16.25%	8,138	16.25%
Moderate	50,337	18.09%	59,398	18.09%	9,061	18.09%
Above Moderate	116,608	41.92%	137,598	41.92%	20,991	41.92%
Total	278,195	100.0%	328,273	100.0%	50,078	100.0%

Sources:

¹ State of California Department of Finance

² State of California Department of Housing and Community Development

- Table 4 provides housing unit and household estimates, by jurisdiction, for the January 1, 2006 beginning date of the Plan. Households are occupied housing units. Data in this table are from Department of Finance housing unit, household, and vacancy rate information by jurisdiction for January 1, 2006.

Table 4
Household and Housing Unit Estimations by Jurisdiction
January 1, 2006

City	Housing Units	Households	Percent Vacant
Clovis	32,458	31,301	3.56%
Coalinga	3,988	3,631	8.95%
Firebaugh	1,806	1,620	10.30%
Fowler	1,519	1,478	2.70%
Fresno	160,446	150,815	6.00%
Huron	1,614	1,574	2.48%
Kerman	3,555	3,450	2.95%
Kingsburg	4,023	3,866	3.90%
Mendota	2,039	1,983	2.75%
Orange Cove	2,153	2,064	4.13%
Parlier	2,990	2,767	7.46%
Reedley	6,570	6,338	3.53%
Sanger	6,527	6,285	3.71%
San Joaquin	822	787	4.26%
Selma	6,701	6,449	3.76%
Incorporated Total	237,211	224,408	5.40%
Unincorporated Total	60,197	53,787	10.65%
County Total	297,408	278,195	6.46%

Source: State of California Department of Finance

4. Table 5 provides the estimated basic construction need for the region, by income group, for the 7 ½ year planning period. The increase in housing units is calculated by first subtracting the number of housing units at the beginning date of the Plan from the housing units at the ending date of the Plan. Next, the housing unit replacement need is calculated using the 0.09 percent annual rate provided by HCD. These two figures are added together and then allocated by income group in accordance with HCD percentage shares. The results are posted to column 3.

Table 5
Basic Construction Need
January 1, 2006 - June 30, 2013

Housing Unit Need by Component:

Household Growth	50,078 ¹
From 278,195 households on Jan. 1, 2006 to 328,273 households on June 30, 2013.	
Homeowner Households	28,294 ²
HCD assumes the 2000 Census proportion of owner-occupied rate of 56.6% remains the same throughout the projection period.	
Homeowner Household Vacancy Allowance	509 ²
HCD assumes a vacancy rate of 1.8% for homeowner households.	
Renter Households	21,784 ²
HCD assumes the 2000 Census proportion of renter-occupied rate of 43.5% remains the same throughout the projection period.	
Renter Household Vacancy Allowance	1,089 ²
HCD assumes a vacancy rate of 5.0% for renter households.	
Subtotal - Household Growth with Vacancy Allowance	51,676 ²
Replacement allowance	
HCD assumes a replacement rate for demolition of .9%	
	466 ²
Total Basic Housing Construction Need	52,142

Housing Unit Need by Income Groups:

Very Low	23.74% ²	12,379
Low	16.25% ²	8,473
Moderate	18.09% ²	9,434
Above Moderate	41.92% ²	21,856
Total	100.0%	52,142

Sources:

¹ State of California Department of Finance

² State of California Department of Housing and Community Development

PROJECTED HOUSEHOLDS PER JURISDICTION AND INCOME GROUP

Table 15 is a table of primary importance in the Plan. It provides, by jurisdiction and market area, the estimated number of households by income group for the January 1, 2006 beginning date of the Plan and the projected number of households by income group for the July 1, 2013 ending date of the Plan. This information is crucial to the later determination of the projected construction need for each jurisdiction during the planning period. Preparation of Table 15 requires numerous steps to be taken, including the development of several intervening tables.

1. List the market areas identified in Task 3 of Chapter 1 in column 1 of Table 15. List for each market area, cities, unincorporated, and (market area) total in column 2. List the four income groups (Very Low, Low, Moderate, and Above Moderate) and a total category for each city, unincorporated area, and (market area) total within each market area in column 3.
2. Post in column 4 of Table 15 the January 1, 2006 beginning date number of total households for each city, the County total incorporated area total, the County total unincorporated area total, and the County total. This information is from Table 4.
3. Calculate the January 1, 2006 beginning year income group percentages for each jurisdiction and post to column 5 in Table 15. The basis for determining the percentage of households in each income group for each jurisdiction is the income group estimates prepared by the Department of Housing and Community for January 1, 2006 total County households. The methodology first identifies the maximum County income associated with each income group. These maximum incomes are then used to determine the number and percent of each jurisdiction's households whose income is less than or equal to the maximum income for each income group. Because 2006 income information is not available, Fresno COG must rely on 2000 U.S. Census income information.
4. Tables 6,8,9 and 10 are derived from 2000 U.S. Census sample data because 2000 U.S. Census 100% data does not contain any income data. The source of the sample data is "2000 U.S. Census SF3 sample data." Household data for the year 2000 in Tables 11 and 13 is from 2000 U.S. Census 100% data.
 - a. Table 6 provides the number of households for each market area, by census income group, utilizing 2000 U.S. Census income information.

Table 6
2000 Number of Households Per Market Area
Per Census Income Group

Source: 2000 U.S. Census

Market Area	Less than \$10,000	\$10,000 to \$14,999	\$15,000 to \$19,999	\$20,000 to \$24,999	\$25,000 to \$29,999	\$30,000 to \$34,999
FCMA	23,698	14,762	14,792	14,789	13,341	13,304
East Valley	3,883	2,867	3,080	2,918	2,828	2,585
Westside North	2,095	1,194	1,493	1,746	1,334	1,270
Westside South	710	512	401	469	483	470
Sierra Nevada	534	346	407	398	360	458
Fresno County	30,920	19,681	20,173	20,320	18,346	18,087

Market Area	\$35,000 to \$39,999	\$40,000 to \$44,999	\$45,000 to \$49,999	\$50,000 to \$59,999	\$60,000 to \$74,999	\$75,000 to \$99,999
FCMA	10,992	10,099	8,771	15,403	17,179	15,741
East Valley	2,364	2,121	1,845	2,899	3,098	2,662
Westside North	909	892	651	962	1,053	965
Westside South	363	376	304	469	437	439
Sierra Nevada	368	300	342	711	667	604
Fresno County	14,996	13,788	11,913	20,444	22,434	20,411

Market Area	\$100,000 to \$124,999	\$125,000 to \$149,999	\$150,000 to \$199,999	\$200,000 or more	Total
FCMA	7,803	3,407	2,884	3,162	190,127
East Valley	1,209	657	362	450	35,828
Westside North	250	150	122	202	15,288
Westside South	163	56	38	53	5,743
Sierra Nevada	473	152	111	87	6,318
Fresno County	9,898	4,422	3,517	3,954	253,304

As Table 6 indicates, the U.S. Census divides households into 16 income groups, based on increments of household income. The 2007 RHNA Plan, however, requires the division of households into the four income groups discussed earlier: Very Low (23.74% of all households); Low (16.25% of all households); Moderate (18.09% of all households); and Above Moderate (41.92% of all households).

- b. A formula was developed to convert data from the 16 income groups listed in the 2000 U.S. Census into the four income groups required by the Plan. The basic purpose of the formula is to determine the household income of the last, or “nth,” household within each of the four income groups required by the Plan. The “nth” household is the cut-off household for the income group category. Any household with an income above the “nth” household is allocated to the next income category.

Table 7 presents the formula that provides for the conversion of the 2000 U.S. Census income groups into the Plan income groups (and indicates the actual dollar interval separating the Plan income groups), for total County households. An important assumption in Table 7 is that households are assumed to be distributed equally over the 2000 U.S. Census income intervals.

- c. Application of the formula developed in Table 7 to information contained in Table 6 for each market area provides for the determination of the number and percentage of households, by Plan income group, within each market area in 2000. For example, the

number and percentage of very low income households in the FCMA market area is determined by adding the total number of FCMA households, from Table 6, within the 2000 U.S. Census income categories less than \$10,000 (23,698 households) and \$10,000 to \$14,999 (14,762 households). To this figure is then added the partial number of households within the 2000 U.S. Census income category \$15,000 to \$19,999, determined by applying the formula developed in Table 7 (47.2612% of the total households within this income category are very low income households) to the total number of FCMA households within this income category (14,792 households). This calculation results in 6,991 of the households within the \$15,000 to \$19,999 income category being very low income households. The total number of very low income households within the FCMA market area is, therefore, 45,451, which corresponds to 23.91% of all households within the FCMA market area in 2000. Table 8 provides for each market area the number and percentage of households by Plan income group in 2000.

Table 7
Formula for Conversion of Households from Census Income Ranges
into Study Income Groups

Study Income Group	Study Income Range in 2000 Dollars	Census Income Ranges and Percent in Study Income Group Formula	
Very Low	\$0 to \$17,363	Less than \$10,000	100.0000%
		\$10,000 to \$14,999	100.0000%
		\$15,000 to \$19,999	47.2612%
Low	\$17,364 to \$27,780	\$15,000 to \$19,999	52.7388%
		\$20,000 to \$24,999	100.0000%
		\$25,000 to \$29,999	55.6089%
Moderate	\$27,781 to \$41,670	\$25,000 to \$29,999	44.3911%
		\$30,000 to \$34,999	100.0000%
		\$35,000 to \$39,999	100.0000%
		\$40,000 to \$44,999	33.4059%
Above Moderate	\$41,671 and above	\$40,000 to \$44,999	66.5941%
		\$45,000 to \$49,999	100.0000%
		\$50,000 to \$59,999	100.0000%
		\$60,000 to \$74,999	100.0000%
		\$75,000 to \$99,999	100.0000%
		\$100,000 to \$124,999	100.0000%
		\$125,000 to \$149,999	100.0000%
		\$150,000 to \$199,999	100.0000%
\$200,000 or more	100.0000%		

Table 8
2000 Households Per Market Area Per Income Group

Market Area	Very Low		Low		Moderate		Above Moderate		Total	
	#	%	#	%	#	%	#	%	#	%
FCMA	45,451	23.91%	30,009	15.78%	33,592	17.67%	81,075	42.64%	190,127	100.00%
East Valley	8,206	22.90%	6,115	17.07%	6,913	19.29%	14,594	40.73%	35,828	100.00%
Westside North	3,995	26.13%	3,275	21.42%	3,069	20.08%	4,949	32.37%	15,288	100.00%
Westside South	1,412	24.58%	949	16.53%	1,173	20.43%	2,209	38.47%	5,743	100.00%
Sierra Nevada	1,072	16.97%	813	12.87%	1,086	17.19%	3,347	52.97%	6,318	100.00%
Fresno County	60,135	23.74%	41,161	16.25%	45,833	18.09%	106,175	41.92%	253,304	100.00%

- d. The next step is to determine for each city the number and percentage of households by Plan income group in 2000. This is accomplished by applying the formula developed in Table 7 (and utilized in Table 8) to 2000 U.S. Census household income group data for cities in Fresno County. Table 9 is the result of applying the formula to the raw data for cities and indicates, for 2000, the number and percentage of households by Plan income group for all of the cities in Fresno County.

Table 9
2000 Households Per Jurisdiction Per Income Group

Jurisdiction	Very Low		Low		Moderate		Above Moderate		Total	
	#	%	#	%	#	%	#	%	#	%
Clovis	4,155	17.20%	3,431	14.21%	4,243	17.56%	12,325	51.03%	24,154	100.00%
Coalinga	767	21.71%	518	14.66%	619	17.53%	1,629	46.10%	3,534	100.00%
Firebaugh	340	24.28%	277	19.77%	317	22.62%	467	33.33%	1,400	100.00%
Fowler	292	24.99%	201	17.16%	224	19.16%	452	38.69%	1,169	100.00%
Fresno	37,239	26.61%	23,115	16.51%	25,020	17.88%	54,595	39.00%	139,969	100.00%
Huron	533	37.77%	257	18.22%	319	22.61%	302	21.41%	1,412	100.00%
Kerman	716	30.14%	339	14.28%	492	20.72%	829	34.87%	2,376	100.00%
Kingsburg	609	19.02%	443	13.83%	612	19.13%	1,537	48.02%	3,200	100.00%
Mendota	590	32.43%	477	26.24%	348	19.13%	404	22.21%	1,819	100.00%
Orange Cove	596	35.42%	435	25.84%	292	17.36%	360	21.39%	1,683	100.00%
Parlier	821	33.31%	557	22.61%	553	22.43%	534	21.65%	2,465	100.00%
Reedley	1,338	23.33%	984	17.16%	1,031	17.98%	2,381	41.53%	5,734	100.00%
Sanger	1,350	25.57%	906	17.16%	1,091	20.66%	1,933	36.61%	5,280	100.00%
San Joaquin	231	32.74%	168	23.80%	148	21.02%	158	22.44%	704	100.00%
Selma	1,218	21.67%	958	17.05%	1,257	22.37%	2,186	38.91%	5,618	100.00%
Unincorporated Area	9,341	17.70%	8,095	15.33%	9,267	17.56%	26,084	49.41%	52,787	100.00%
Fresno County	60,135	23.74%	41,161	16.25%	45,833	18.09%	106,175	41.92%	253,304	100.00%

- e. The next step is to determine for the unincorporated area of each market area the number and percentage of households by Plan income group in 2000. This is accomplished by subtracting the city data in Table 9 from the market area data in Table 8, as shown in Table 10. Table 10 incorporates information from Tables 8 and 9 so that the information is available all in one Table.

- f. The 2007 RHNA Plan assumes the percentage of households in each Plan income group is the same for each city and market area unincorporated area on January 1, 2006 as it was in 2000. This assumption is made necessary because 2006 income data, which would indicate income group changes between 2000 and 2006, is not available for use in this Plan. The percentages of households in each Plan income group for each city and market area unincorporated area are posted to column 5 of Table 15.

- g. Table 11 determines each market area's unincorporated percentage of the total County unincorporated households in 2000, in order to calculate the number of unincorporated households in each market area for the January 1, 2006 beginning year of the Plan. Table 11 assumes that the percentage of unincorporated households within each market area is the same in 2006 as it was in 2000. Staff believes this assumption can be made because, just as was the case in the 1990s, there have been virtually no inhabited annexations, most importantly within the FCMA, during the six years between 2000 and 2005. This was not the case during the 1970s and 1980s.

Table 10
2000 Incorporated and Unincorporated Households
Per Market Area Per Income Group

	Very Low		Low		Moderate		Above Moderate		Total	
	#	%	#	%	#	%	#	%	#	%
FCMA										
Total	45,451	23.91%	30,009	15.78%	33,592	17.67%	81,075	42.64%	190,127	100.00%
Clovis	4,155	17.20%	3,431	14.21%	4,243	17.56%	12,325	51.03%	24,154	100.00%
Fresno	37,239	26.61%	23,115	16.51%	25,020	17.88%	54,595	39.00%	139,969	100.00%
Unincorporated	4,056	15.60%	3,462	13.32%	4,329	16.65%	14,156	54.44%	26,004	100.00%
East Valley										
Total	8,206	22.90%	6,115	17.07%	6,913	19.29%	14,594	40.73%	35,828	100.00%
Fowler	292	24.99%	201	17.16%	224	19.16%	452	38.69%	1,169	100.00%
Kingsburg	609	19.02%	443	13.83%	612	19.13%	1,537	48.02%	3,200	100.00%
Orange Cove	596	35.42%	435	25.84%	292	17.36%	360	21.39%	1,683	100.00%
Parlier	821	33.31%	557	22.61%	553	22.43%	534	21.65%	2,465	100.00%
Reedley	1,338	23.33%	984	17.16%	1,031	17.98%	2,381	41.53%	5,734	100.00%
Sanger	1,350	25.57%	906	17.16%	1,091	20.66%	1,933	36.61%	5,280	100.00%
Selma	1,218	21.67%	958	17.05%	1,257	22.37%	2,186	38.91%	5,618	100.00%
Unincorporated	1,983	18.57%	1,631	15.28%	1,853	17.35%	5,212	48.80%	10,679	100.00%
Westside North										
Total	3,995	26.13%	3,275	21.42%	3,069	20.08%	4,949	32.37%	15,288	100.00%
Firebaugh	340	24.28%	277	19.77%	317	22.62%	467	33.33%	1,400	100.00%
Kerman	716	30.14%	339	14.28%	492	20.72%	829	34.87%	2,376	100.00%
Mendota	590	32.43%	477	26.24%	348	19.13%	404	22.21%	1,819	100.00%
San Joaquin	231	32.74%	168	23.80%	148	21.02%	158	22.44%	704	100.00%
Unincorporated	2,118	23.57%	2,014	22.41%	1,764	19.63%	3,092	34.40%	8,989	100.00%
Westside South										
Total	1,412	24.58%	949	16.53%	1,173	20.43%	2,209	38.47%	5,743	100.00%
Coalinga	767	21.71%	518	14.66%	619	17.53%	1,629	46.10%	3,534	100.00%
Huron	533	37.77%	257	18.22%	319	22.61%	302	21.41%	1,412	100.00%
Unincorporated	111	13.93%	174	21.78%	234	29.41%	278	34.87%	797	100.00%
Sierra Nevada										
Total	1,072	16.97%	813	12.87%	1,086	17.19%	3,347	52.97%	6,318	100.00%
Unincorporated	1,072	16.97%	813	12.87%	1,086	17.19%	3,347	52.97%	6,318	100.00%
Incorp. Total	50,794	25.33%	33,066	16.49%	36,566	18.24%	80,091	39.94%	200,517	100.00%
Unincorp. Total	9,341	17.70%	8,095	15.33%	9,267	17.56%	26,084	49.41%	52,787	100.00%
County Total	60,135	23.74%	41,161	16.25%	45,833	18.09%	106,175	41.92%	253,304	100.00%

Total households for the unincorporated area of each market area are derived by applying the ratio between the number of households within the unincorporated portion of a market area (from the 2000 U.S. Census) and the number of households within the entire County unincorporated area (also from the 2000 U.S. Census), to the total County unincorporated households on January 1, 2006. Again, because data is not available for 2006, Fresno COG determined that this was the most appropriate method to allocate January 1, 2006 total County unincorporated households among the market area unincorporated areas. Table 11 provides this data for 2000. The total number of County unincorporated households on January 1, 2006 is from Table 4.

Table 11
2000 Distribution of Unincorporated Households

Market Area	Unincorporated Households	Percentage
FCMA	25,311	48.58%
East Valley	10,671	20.48%
Westside North	8,944	17.17%
Westside South	865	1.66%
Sierra Nevada	6,311	12.11%
County Total	52,102	100.00%

Source: 2000 U.S. Census 100% data

Table 12
2006 Incorporated and Unincorporated Households
Per Market Area

Area	Households
FCMA Total	208,246
Clovis	31,301
Fresno	150,815
Unincorporated Area	26,130
East Valley Total	40,263
Fowler	1,478
Kingsburg	3,866
Orange Cove	2,064
Parlier	2,767
Reedley	6,338
Sanger	6,285
Selma	6,449
Unincorporated Area	11,016
Westside North Total	17,073
Firebaugh	1,620
Kerman	3,450
Mendota	1,983
San Joaquin	787
Unincorporated Area	9,233
Westside South Total	6,098
Coalinga	3,631
Huron	1,574
Unincorporated Area	893
Sierra Nevada Total	6,515
Unincorporated Area	6,515
Incorporated Total	224,408
Unincorporated Total	53,787
County Total	278,195

Source: State of California Department of Finance for the cities and total unincorporated area.

The unincorporated area households were distributed by market area by assuming the same percentage shares of households for 2000 as listed in Table 11.

- h. Table 12 includes for the January 1, 2006 beginning date of the Plan household estimates for each city within each market area (from Table 4), the number of unincorporated households within each market area (determined by applying the % figures from Table 11 to the January 1, 2006 total County unincorporated households), and for each total market area. The total number of households for each market area unincorporated area is posted to column 4 of Table 15.
4. The number of households within each Plan income group for January 1, 2006 is determined by multiplying the income group percentage figures in column 5 by the total number of households for each market area city, market area unincorporated area, and market area total households. The results of these calculations are posted to column 4 of Table 15.

Table 13 utilizes the 2000 information from Table 10 and the January 1, 2006 information from Table 12 to determine information for the June 30, 2013 ending date of the Plan, utilizing a trend line method. The assumption was made that each jurisdiction will account for the same share of the county's growth during the 7 ½ year planning period of the Plan as it did for the period between 2000 and 2006. For example, the number of households in Clovis increased from 24,347 households in 2000 (from Table 9) to 31,301 households in 2006 (from Table 4), an increase of 6,954 households or 27.54% of Fresno County's 2000-2006 growth of 25,255 households. Since this Plan projects Fresno County's households will increase by another 50,078 during this Plan's planning period, Clovis is projected to receive 27.54% of that growth as well, resulting in 45,090 households for Clovis on June 30, 2013. The percentages noted in column 7 of Table 13 titled "Increase 2000-2006" are not growth rates of a particular jurisdiction but rather show each jurisdiction's percentage of the County's total growth during that period.

Information in column 8 of Table 13, projected households for market area cities, market area unincorporated areas, and total market areas, is posted to column 6 of Table 15 as the projected total household figures for the different Plan market areas in June 30, 2013.

5. In the 1990 Regional Housing Needs Allocation Plan, a manual adjustment was made to the FCMA Market Area, specifically to the unincorporated area share of households and to the City of Fresno share of households. This was done to slow the estimated decline in the number of unincorporated households predicted by the trend line method. In 1990 it was determined that the extent of inhabited annexation activity between 1980 and 1989 would slow considerably during the planning period of the 1990 Plan, between January 1, 1989 and June 30, 1996. Consequently, a strict application of the trend line method for FCMA unincorporated households and City of Fresno households was determined not to be warranted.

The degree of inhabited annexation activity during the January 1, 2000 to June 30, 2007 planning period of the 2001 RHNA Plan was projected to be similar to that of the 1990 to 2000 period. Therefore, a manual adjustment for FCMA unincorporated and City of Fresno households was not warranted in the 2001 RHNA Plan, nor is it warranted in the 2007 RHNA Plan for the same reason. The projected total household figures for each market area, market area city and market area unincorporated area from column 8 in Table 13 are posted to column 6 (jurisdictional and market area totals) of Table 15.

**Table 13
Household Estimates and Projections, 2000-2013**

Market Area	City/Unincorporated	2000	2006	2006 %	Increase 2000-2006		Projection 2013
					#	%	
FCMA	Clovis	24,347	31,301	11.25%	6,954	27.54%	45,090
	Fresno	140,079	150,815	54.21%	10,736	42.51%	172,103
	Unincorporated	25,311	26,130	9.39%	819	3.24%	27,754
	FCMA Total	189,737	208,246	74.86%	18,509	73.29%	244,947
East Valley	Fowler	1,242	1,478	0.53%	236	0.93%	1,946
	Kingsburg	3,226	3,866	1.39%	640	2.53%	5,135
	Orange Cove	1,694	2,064	0.74%	370	1.47%	2,798
	Parlier	2,446	2,767	0.99%	321	1.27%	3,404
	Reedley	5,761	6,338	2.28%	577	2.28%	7,482
	Sanger	5,220	6,285	2.26%	1,065	4.22%	8,397
	Selma	5,596	6,449	2.32%	853	3.38%	8,140
	Unincorporated	10,671	11,016	3.96%	345	1.37%	11,700
	East Valley Total	35,856	40,263	14.47%	4,407	17.45%	49,002
Westside North	Firebaugh	1,418	1,620	0.58%	202	0.80%	2,021
	Kerman	2,389	3,450	1.24%	1,061	4.20%	5,554
	Mendota	1,825	1,983	0.71%	158	0.63%	2,296
	San Joaquin	702	787	0.28%	85	0.34%	956
	Unincorporated	8,944	9,233	3.32%	289	1.14%	9,806
	Westside North Total	15,278	17,073	6.14%	1,795	7.11%	20,632
Westside South	Coalinga	3,515	3,631	1.31%	116	0.46%	3,861
	Huron	1,378	1,574	0.57%	196	0.78%	1,963
	Unincorporated	865	893	0.32%	28	0.11%	949
	Westside South Total	5,758	6,098	2.19%	340	1.35%	6,772
Sierra Nevada	Unincorporated	6,311	6,515	2.34%	204	0.81%	6,920
	Sierra Nevada Total	6,311	6,515	2.34%	204	0.81%	6,920
Incorp. Total		200,838	224,408	80.67%	23,570	93.33%	271,145
Unincorp. Total		52,102	53,787	19.33%	1,685	6.67%	57,128
County Total		252,940	278,195	100.00%	25,255	100.00%	328,273

- The next step is to distribute the June 30, 2013 household projections to market area cities and market area unincorporated areas, by income group, after adjustments for low-income impaction. State Housing Element Law (Section 65584 in particular) requires that housing allocations must seek to reduce the concentration of lower income households in cities or counties that are impacted by disproportionately high proportions of lower income households. Fresno COG staff has determined in the draft 2007 RHNA Plan that there is no issue of lower income household impaction for the Sierra Nevada market area. Therefore, the income group percentages were determined to be the same at the end of the 7 ½ planning cycle as they were at the beginning of the cycle. The rationale for this position is described below.

The Sierra Nevada market area is unique among County market areas in that it is entirely unincorporated area. Consequently, there is no opportunity to shift lower income housing from one jurisdiction to another. Furthermore, the growth in total households for this market area during the planning period is projected to be only 405 households. Therefore, the Sierra Nevada market area is determined to be a stable market area, just as it was in the earlier 2001 and 1990 RHNA Plans.

- a. A “same share plan” was applied to the other four market areas. The “same share plan” is intended to reduce the concentration of lower income households in jurisdictions within the four market areas that are impacted by disproportionately high proportions of lower income households. Table 14 provides information as to how this was accomplished.
- b. For each market area on January 1, 2006, the difference between the market area total percentage of households and the jurisdiction’s percentage of households, for each income group, was calculated. The resulting percentage figure was divided by 5.87 (the 44 years assumed necessary to achieve the fair share allocation divided by the 7 and ½ year period of the Plan), resulting in a percentage figure that was then added to the percentage figure for each income group for each jurisdiction on January 1, 2006. Column 7 of Table 14 lists the percentage figures that are the result of these calculations. These percentage figures are then multiplied by the total number of households projected on June 30, 2013 for each jurisdiction within each market area, as noted in column 6 of Table 14. Information in columns 6 and 7 of Table 14 is then posted to columns 6 and 7 of Table 15. This methodology was also utilized in the earlier 2001 and 1990 RHNA Plans, except that the period to achieve the fair share allocation has been changed to coincide with the Blueprint Planning time horizon.

Table 14
Calculation of Household Income Group Allocations
For the FCMA, East Valley, Westside North and South Market Areas

FCMA	Income Group	January 1, 2006 Households		Difference Between FCMA Percentage and Local Jurisdiction Percentage*	June 30, 2013 Fair Share Target	
		#	%		#	%
Clovis	Very Low	5,385	17.20%	-6.61%	8,265	18.33%
	Low	4,447	14.21%	-1.56%	6,525	14.47%
	Moderate	5,498	17.56%	-0.11%	7,928	17.58%
	Above Moderate	15,972	51.03%	8.28%	22,372	49.62%
	Total	31,301	100.00%		45,090	100.00%
Fresno	Very Low	40,125	26.61%	2.79%	44,969	26.13%
	Low	24,906	16.51%	0.75%	28,202	16.39%
	Moderate	26,959	17.88%	0.20%	30,705	17.84%
	Above Moderate	58,825	39.00%	-3.74%	68,227	39.64%
	Total	150,815	100.00%		172,103	100.00%
Unincorporated Area	Very Low	4,076	15.60%	-8.21%	4,713	17.00%
	Low	3,479	13.32%	-2.45%	3,807	13.73%
	Moderate	4,350	16.65%	-1.03%	4,665	16.82%
	Above Moderate	14,224	54.44%	11.69%	14,568	52.44%
	Total	26,130	100.00%		27,754	100.00%
FCMA Total	Very Low	49,586	23.81%		57,946	23.66%
	Low	32,832	15.77%		38,535	15.73%
	Moderate	36,807	17.67%		43,299	17.68%
	Above Moderate	89,021	42.75%		105,167	42.93%
	Total	208,246	100.00%		244,947	100.00%

* Positive numbers in this column indicate that the jurisdiction has a percentage higher than the market area, while negative numbers indicate that the jurisdiction has a percentage lower than the market area. A jurisdiction with 0% would have the same percentage as the market area.

Table 14 (continued)

East Valley	Income Group	January 1, 2006		Difference Between East Valley Percentage and Local Jurisdiction Percentage*	June 30, 2013	
		Households #	%		Fair Share Target #	%
Fowler	Very Low	369	24.99%	1.92%	480	24.66%
	Low	254	17.16%	0.04%	334	17.16%
	Moderate	283	19.16%	-0.20%	373	19.19%
	Above Moderate	572	38.69%	-1.76%	759	38.99%
	Total	1,478	100.00%		1,946	100.00%
Kingsburg	Very Low	735	19.02%	-4.05%	1,012	19.71%
	Low	535	13.83%	-3.29%	739	14.40%
	Moderate	739	19.13%	-0.23%	984	19.16%
	Above Moderate	1,857	48.02%	7.57%	2,400	46.73%
	Total	3,866	100.00%		5,135	100.00%
Orange Cove	Very Low	731	35.42%	12.35%	932	33.31%
	Low	533	25.84%	8.71%	681	24.36%
	Moderate	358	17.36%	-2.00%	495	17.70%
	Above Moderate	441	21.39%	-19.06%	689	24.64%
	Total	2,064	100.00%		2,798	100.00%
Parlier	Very Low	922	33.31%	10.24%	1,074	31.56%
	Low	626	22.61%	5.49%	738	21.68%
	Moderate	621	22.43%	3.08%	746	21.91%
	Above Moderate	599	21.65%	-18.81%	846	24.85%
	Total	2,767	100.00%		3,404	100.00%
Reedley	Very Low	1,479	23.33%	0.27%	1,742	23.28%
	Low	1,088	17.16%	0.03%	1,284	17.16%
	Moderate	1,139	17.98%	-1.38%	1,363	18.21%
	Above Moderate	2,632	41.53%	1.08%	3,094	41.35%
	Total	6,338	100.00%		7,482	100.00%
Sanger	Very Low	1,607	25.57%	2.50%	2,111	25.14%
	Low	1,078	17.16%	0.03%	1,440	17.15%
	Moderate	1,299	20.66%	1.30%	1,716	20.44%
	Above Moderate	2,301	36.61%	-3.84%	3,129	37.27%
	Total	6,285	100.00%		8,397	100.00%
Selma	Very Low	1,398	21.67%	-1.39%	1,783	21.91%
	Low	1,100	17.05%	-0.08%	1,389	17.06%
	Moderate	1,443	22.37%	3.01%	1,779	21.86%
	Above Moderate	2,509	38.91%	-1.55%	3,188	39.17%
	Total	6,449	100.00%		8,140	100.00%
Unincorporated Area	Very Low	2,045	18.57%	-4.49%	2,262	19.33%
	Low	1,683	15.28%	-1.85%	1,824	15.59%
	Moderate	1,912	17.35%	-2.00%	2,070	17.70%
	Above Moderate	5,376	48.80%	8.35%	5,543	47.38%
	Total	11,016	100.00%		11,700	100.00%
East Valley Total	Very Low	9,286	23.06%		11,397	23.26%
	Low	6,896	17.13%		8,430	17.20%
	Moderate	7,794	19.36%		9,527	19.44%
	Above Moderate	16,287	40.45%		19,648	40.10%
	Total	40,263	100.00%		49,002	100.00%

* Positive numbers in this column indicate that the jurisdiction has a percentage higher than the market area, while negative numbers indicate that the jurisdiction has a percentage lower than the market area. A jurisdiction with 0% would have the same percentage as the market area.

Table 14 (continued)

Westside North	Income Group	January 1, 2006		Difference Between Westside North Percentage and Local Jurisdiction Percentage*	June 30, 2013	
		Households #	%		Fair Share Target #	%
Firebaugh	Very Low	393	24.28%	-2.14%	498	24.64%
	Low	320	19.77%	-1.25%	404	19.99%
	Moderate	366	22.62%	2.48%	449	22.20%
	Above Moderate	540	33.33%	0.90%	670	33.17%
	Total	1,620	100.00%		2,021	100.00%
Kerman	Very Low	1,040	30.14%	3.72%	1,638	29.50%
	Low	493	14.28%	-6.75%	857	15.43%
	Moderate	715	20.72%	0.58%	1,145	20.62%
	Above Moderate	1,203	34.87%	2.45%	1,914	34.46%
	Total	3,450	100.00%		5,554	100.00%
Mendota	Very Low	643	32.43%	6.01%	721	31.40%
	Low	520	26.24%	5.21%	582	25.35%
	Moderate	379	19.13%	-1.01%	443	19.30%
	Above Moderate	440	22.21%	-10.22%	550	23.95%
	Total	1,983	100.00%		2,296	100.00%
San Joaquin	Very Low	258	32.74%	6.33%	303	31.66%
	Low	187	23.80%	2.77%	223	23.33%
	Moderate	165	21.02%	0.88%	200	20.87%
	Above Moderate	177	22.44%	-9.98%	231	24.14%
	Total	787	100.00%		956	100.00%
Unincorporated Area	Very Low	2,176	23.57%	-2.85%	2,359	24.05%
	Low	2,069	22.41%	1.38%	2,174	22.17%
	Moderate	1,812	19.63%	-0.51%	1,933	19.71%
	Above Moderate	3,176	34.40%	1.97%	3,340	34.06%
	Total	9,233	100.00%		9,806	100.00%
Westside North Total	Very Low	4,510	26.41%		5,519	26.75%
	Low	3,590	21.02%		4,240	20.55%
	Moderate	3,438	20.14%		4,170	20.21%
	Above Moderate	5,536	32.42%		6,705	32.50%
	Total	17,073	100.00%		20,633	100.00%

* Positive numbers in this column indicate that the jurisdiction has a percentage higher than the market area, while negative numbers indicate that the jurisdiction has a percentage lower than the market area. A jurisdiction with 0% would have the same percentage as the market area.

Table 14 (continued)

Westside South	Income Group	January 1, 2006		Difference Between Westside South Percentage and Local Jurisdiction Percentage*	June 30, 2013	
		Households #	%		Fair Share Target #	%
Coalinga	Very Low	788	21.71%	-3.01%	858	22.22%
	Low	532	14.66%	-1.96%	579	15.00%
	Moderate	636	17.53%	-3.05%	697	18.05%
	Above Moderate	1,674	46.10%	8.02%	1,727	44.73%
	Total	3,631	100.00%		3,861	100.00%
Huron	Very Low	594	37.77%	13.05%	698	35.54%
	Low	287	18.22%	1.59%	352	17.95%
	Moderate	356	22.61%	2.03%	437	22.26%
	Above Moderate	337	21.41%	-16.67%	476	24.25%
	Total	1,574	100.00%		1,963	100.00%
Unincorporated Area	Very Low	124	13.93%	-10.79%	149	15.77%
	Low	195	21.78%	5.16%	199	20.90%
	Moderate	263	29.41%	8.83%	269	27.91%
	Above Moderate	311	34.87%	-3.21%	332	35.42%
	Total	893	100.00%		949	100.00%
Westside South Total	Very Low	1,507	24.72%		1,704	25.16%
	Low	1,014	16.62%		1,131	16.69%
	Moderate	1,255	20.58%		1,403	20.71%
	Above Moderate	2,322	38.08%		2,535	37.43%
	Total	6,098	100.00%		6,773	100.00%

* Positive numbers in this column indicate that the jurisdiction has a percentage higher than the market area, while negative numbers indicate that the jurisdiction has a percentage lower than the market area. A jurisdiction with 0% would have the same percentage as the market area.

7. The final step is to calculate and post in columns 8 and 9 of Table 15 the change in the number of households and the change in the percentage of households from January 1, 2006 to June 30, 2013, by income group for each jurisdiction.

Table 15
Estimated Households on January 1, 2006 by Income Group
and Projected Households on June 30, 2013 With Income Group Allocations

Market Area	Jurisdiction	Income Group	January 1, 2006		June 30, 2013		2006 - 2013	
			Households #	%	Households #	%	Household Growth #	%
FCMA	Clovis	Very Low	5,385	17.20%	8,265	18.33%	2,880	20.89%
		Low	4,447	14.21%	6,525	14.47%	2,079	15.08%
		Moderate	5,498	17.56%	7,928	17.58%	2,430	17.63%
		Above Moderate	15,972	51.03%	22,372	49.62%	6,400	46.41%
		Total	31,301	100.00%	45,090	100.00%	13,789	100.00%
	Fresno	Very Low	40,125	26.61%	44,969	26.13%	4,844	22.75%
		Low	24,906	16.51%	28,202	16.39%	3,296	15.48%
		Moderate	26,959	17.88%	30,705	17.84%	3,746	17.60%
		Above Moderate	58,825	39.00%	68,227	39.64%	9,401	44.16%
		Total	150,815	100.00%	172,103	100.00%	21,288	100.00%
	Unincorporated Area	Very Low	4,076	15.60%	4,713	17.00%	637	39.21%
		Low	3,479	13.32%	3,807	13.73%	328	20.21%
		Moderate	4,350	16.65%	4,665	16.82%	315	19.39%
		Above Moderate	14,224	54.44%	14,568	52.44%	344	21.19%
		Total	26,130	100.00%	27,754	100.00%	1,624	100.00%
	FCMA Total	Very Low	49,586	23.81%	57,946	23.66%	8,361	22.78%
		Low	32,832	15.77%	38,535	15.73%	5,703	15.54%
		Moderate	36,807	17.67%	43,299	17.68%	6,492	17.69%
		Above Moderate	89,021	42.75%	105,167	42.93%	16,145	43.99%
		Total	208,246	100.00%	244,947	100.00%	36,701	100.00%

Table 15 (continued)

Market Area	Jurisdiction	Income Group	January 1, 2006		June 30, 2013		2006 - 2013	
			Households #	%	Households #	%	Household Growth #	%
East Valley	Fowler	Very Low	369	24.99%	480	24.66%	111	23.62%
		Low	254	17.16%	334	17.16%	80	17.14%
		Moderate	283	19.16%	373	19.19%	90	19.30%
		Above Moderate	572	38.69%	759	38.99%	187	39.94%
		Total	1,478	100.00%	1,946	100.00%	468	100.00%
	Kingsburg	Very Low	735	19.02%	1,012	19.71%	277	21.81%
		Low	535	13.83%	739	14.40%	204	16.11%
		Moderate	739	19.13%	984	19.16%	245	19.29%
		Above Moderate	1,857	48.02%	2,400	46.73%	543	42.80%
		Total	3,866	100.00%	5,135	100.00%	1,269	100.00%
	Orange Cove	Very Low	731	35.42%	932	33.31%	201	27.39%
		Low	533	25.84%	681	24.36%	148	20.18%
		Moderate	358	17.36%	495	17.70%	137	18.66%
		Above Moderate	441	21.39%	689	24.64%	248	33.78%
		Total	2,064	100.00%	2,798	100.00%	734	100.00%
	Parlier	Very Low	922	33.31%	1,074	31.56%	153	23.98%
		Low	626	22.61%	738	21.68%	112	17.62%
		Moderate	621	22.43%	746	21.91%	125	19.63%
		Above Moderate	599	21.65%	846	24.85%	247	38.78%
		Total	2,767	100.00%	3,404	100.00%	637	100.00%
	Reedley	Very Low	1,479	23.33%	1,742	23.28%	263	23.03%
		Low	1,088	17.16%	1,284	17.16%	196	17.12%
		Moderate	1,139	17.98%	1,363	18.21%	223	19.52%
		Above Moderate	2,632	41.53%	3,094	41.35%	461	40.33%
		Total	6,338	100.00%	7,482	100.00%	1,144	100.00%
	Sanger	Very Low	1,607	25.57%	2,111	25.14%	504	23.87%
		Low	1,078	17.16%	1,440	17.15%	362	17.14%
		Moderate	1,299	20.66%	1,716	20.44%	418	19.78%
		Above Moderate	2,301	36.61%	3,129	37.27%	828	39.21%
		Total	6,285	100.00%	8,397	100.00%	2,112	100.00%
	Selma	Very Low	1,398	21.67%	1,783	21.91%	386	22.81%
		Low	1,100	17.05%	1,389	17.06%	289	17.11%
		Moderate	1,443	22.37%	1,779	21.86%	336	19.90%
		Above Moderate	2,509	38.91%	3,188	39.17%	679	40.17%
		Total	6,449	100.00%	8,140	100.00%	1,691	100.00%
	Unincorporated Area	Very Low	2,045	18.57%	2,262	19.33%	217	31.67%
		Low	1,683	15.28%	1,824	15.59%	141	20.67%
		Moderate	1,912	17.35%	2,070	17.70%	159	23.20%
		Above Moderate	5,376	48.80%	5,543	47.38%	167	24.46%
		Total	11,016	100.00%	11,700	100.00%	684	100.00%
East Valley Total	Very Low	9,286	23.06%	11,397	23.26%	2,111	24.16%	
	Low	6,896	17.13%	8,430	17.20%	1,534	17.55%	
	Moderate	7,794	19.36%	9,527	19.44%	1,733	19.83%	
	Above Moderate	16,287	40.45%	19,648	40.10%	3,361	38.46%	
	Total	40,263	100.00%	49,002	100.00%	8,739	100.00%	

Table 15 (continued)

Market Area	Jurisdiction	Income Group	January 1, 2006		June 30, 2013		2006 - 2013	
			Households #	%	Households #	%	Household Growth #	%
Westside North	Firebaugh	Very Low	393	24.28%	498	24.64%	105	26.11%
		Low	320	19.77%	404	19.99%	84	20.85%
		Moderate	366	22.62%	449	22.20%	82	20.49%
		Above Moderate	540	33.33%	670	33.17%	131	32.55%
		Total	1,620	100.00%	2,021	100.00%	401	100.00%
	Kerman	Very Low	1,040	30.14%	1,638	29.50%	599	28.46%
		Low	493	14.28%	857	15.43%	364	17.31%
		Moderate	715	20.72%	1,145	20.62%	430	20.46%
		Above Moderate	1,203	34.87%	1,914	34.46%	711	33.77%
		Total	3,450	100.00%	5,554	100.00%	2,104	100.00%
	Mendota	Very Low	643	32.43%	721	31.40%	78	24.91%
		Low	520	26.24%	582	25.35%	62	19.72%
		Moderate	379	19.13%	443	19.30%	64	20.39%
		Above Moderate	440	22.21%	550	23.95%	109	34.98%
		Total	1,983	100.00%	2,296	100.00%	313	100.00%
	San Joaquin	Very Low	258	32.74%	303	31.66%	45	26.64%
		Low	187	23.80%	223	23.33%	36	21.12%
		Moderate	165	21.02%	200	20.87%	34	20.17%
		Above Moderate	177	22.44%	231	24.14%	54	32.07%
		Total	787	100.00%	956	100.00%	169	100.00%
Unincorporated Area	Very Low	2,176	23.57%	2,359	24.05%	183	31.87%	
	Low	2,069	22.41%	2,174	22.17%	105	18.37%	
	Moderate	1,812	19.63%	1,933	19.71%	121	21.12%	
	Above Moderate	3,176	34.40%	3,340	34.06%	164	28.64%	
	Total	9,233	100.00%	9,806	100.00%	573	100.00%	
Westside North Total	Very Low	4,510	26.41%	5,519	26.75%	1,009	28.35%	
	Low	3,590	21.02%	4,240	20.55%	651	18.27%	
	Moderate	3,438	20.14%	4,170	20.21%	731	20.55%	
	Above Moderate	5,536	32.42%	6,705	32.50%	1,169	32.83%	
	Total	17,073	100.00%	20,633	100.00%	3,560	100.00%	

Market Area	Jurisdiction	Income Group	January 1, 2006		June 30, 2013		2006 - 2013	
			Households #	%	Households #	%	Household Growth #	%
Westside South	Coalinga	Very Low	788	21.71%	858	22.22%	70	30.31%
		Low	532	14.66%	579	15.00%	47	20.27%
		Moderate	636	17.53%	697	18.05%	60	26.26%
		Above Moderate	1,674	46.10%	1,727	44.73%	53	23.16%
		Total	3,631	100.00%	3,861	100.00%	230	100.00%
	Huron	Very Low	594	37.77%	698	35.54%	103	26.54%
		Low	287	18.22%	352	17.95%	66	16.85%
		Moderate	356	22.61%	437	22.26%	81	20.86%
		Above Moderate	337	21.41%	476	24.25%	139	35.75%
		Total	1,574	100.00%	1,963	100.00%	389	100.00%
	Unincorporated Area	Very Low	124	13.93%	149	15.77%	24	43.30%
		Low	195	21.78%	199	20.90%	5	8.67%
		Moderate	263	29.41%	269	27.91%	6	11.04%
		Above Moderate	311	34.87%	332	35.42%	21	37.00%
		Total	893	100.00%	949	100.00%	56	100.00%
	Westside South Total	Very Low	1,507	24.72%	1,704	25.16%	197	29.22%
		Low	1,014	16.62%	1,131	16.69%	117	17.33%
		Moderate	1,255	20.58%	1,403	20.71%	148	21.89%
		Above Moderate	2,322	38.08%	2,535	37.43%	213	31.56%
		Total	6,098	100.00%	6,773	100.00%	675	100.00%

Table 15 (continued)

Market Area	Jurisdiction	Income Group	January 1, 2006		June 30, 2013		2006 - 2013	
			Households #	%	Households #	%	Household Growth #	%
Sierra Nevada	Unincorporated Area	Very Low	1,106	16.97%	1,175	16.97%	69	16.97%
		Low	838	12.87%	890	12.87%	52	12.87%
		Moderate	1,120	17.19%	1,190	17.19%	70	17.19%
		Above Moderate	3,451	52.97%	3,666	52.97%	215	52.97%
		Total	6,515	100.00%	6,920	100.00%	405	100.00%
	Sierra Nevada Total	Very Low	1,106	16.97%	1,175	16.97%	69	16.97%
		Low	838	12.87%	890	12.87%	52	12.87%
		Moderate	1,120	17.19%	1,190	17.19%	70	17.19%
		Above Moderate	3,451	52.97%	3,666	52.97%	215	52.97%
		Total	6,515	100.00%	6,920	100.00%	405	100.00%
County Total	Incorporated Area	Very Low	56,466	25.16%	67,084	24.74%	10,618	22.72%
		Low	36,906	16.45%	44,330	16.35%	7,424	15.89%
		Moderate	40,957	18.25%	49,460	18.24%	8,503	18.19%
		Above Moderate	90,079	40.14%	110,271	40.67%	20,192	43.20%
		Total	224,408	100.00%	271,146	100.00%	46,738	100.00%
	Unincorporated Area	Very Low	9,528	17.71%	10,657	18.65%	1,129	33.78%
		Low	8,264	15.36%	8,896	15.57%	632	18.91%
		Moderate	9,457	17.58%	10,127	17.73%	670	20.06%
		Above Moderate	26,539	49.34%	27,450	48.05%	911	27.25%
		Total	53,787	100.00%	57,129	100.00%	3,342	100.00%
	County Total	Very Low	65,994	23.72%	77,741	23.68%	11,747	23.46%
		Low	45,170	16.24%	53,226	16.21%	8,056	16.09%
		Moderate	50,414	18.12%	59,588	18.15%	9,174	18.32%
		Above Moderate	116,618	41.92%	137,721	41.95%	21,103	42.14%
		Total	278,195	100.00%	328,275	100.00%	50,080	100.00%

BASIC CONSTRUCTION NEED

Basic construction need is the number of new housing units that must be constructed to provide housing for the anticipated population. The calculation of the basic construction need for each local jurisdiction and market area considers existing housing units, projected number of households, vacancy factors, and an allowance for normal market removal of housing units. The methodology does not include an estimate of the need to replace dilapidated units that are beyond repair but that are not expected to be removed during the planning period as part of normal market activity. This task is beyond the scope of the 2007 RHNA Plan and is to be estimated by jurisdictions in preparing their housing elements.

Key factors and procedures for calculating the basic construction need are summarized as follows:

1. Provide one housing unit for each anticipated household.
2. Provide a sufficient number of housing units to accommodate vacant for sale units, vacant for rent units, and other vacant units.
3. The sum of items 1 and 2 constitutes the total number of housing units required to accommodate the projected population by the June 30, 2013 ending date of the Plan.
4. Reduce the total number of units required by the number of units existing on January 1, 2006, to obtain the number of units needed to accommodate population growth.

5. Provide a sufficient number of units to replace expected removals from the housing market.
6. The sum of items 4 and 5 constitutes the basic construction need, or total number of new housing units required to house the projected population between January 1, 2006 and June 30, 2013

As noted above, three separate vacancy factors are utilized to provide for units vacant for sale, units vacant for rent, and other vacant units. An owner vacancy rate of 1.8% of the owner occupied housing units, and a renter vacancy rate of 5.0% of the renter occupied housing units are applied, as suggested by the State Department of Housing & Community Development. The other vacant rate is the actual rate for each jurisdiction, from the 2000 U.S. Census.

Table 16 includes for each market area, each city, and each market area unincorporated area the various vacancy rates and also data on the percent of households that are owner-occupied and renter-occupied, all from the 2000 U.S. Census. Information from Table 16 is used in Table 17 to determine the Basic Construction Need for each jurisdiction in the County.

Table 16
2000 Occupancy and Vacancy Rates

Source: 2000 U.S. Census

	Percent of Households that are Owner-Occupied	Percent of Households that are Renter-Occupied	For Sale Vacancy Rate	For Rent Vacancy Rate	Other Vacancy Rate	Total Vacancy Rate
FCMA Total	55.33%	44.67%	1.29%	3.16%	0.94%	5.40%
Clovis	60.67%	39.33%	0.89%	1.78%	0.89%	3.56%
Fresno	50.67%	49.33%	1.39%	3.73%	0.90%	6.03%
Unincorporated Area	75.82%	24.18%	1.19%	1.16%	1.23%	3.58%
East Valley Total	61.72%	38.28%	0.72%	2.12%	1.81%	4.66%
Fowler	59.07%	40.93%	0.00%	1.25%	1.25%	2.51%
Kingsburg	67.27%	32.73%	1.44%	1.89%	0.57%	3.90%
Orange Cove	45.43%	54.57%	0.00%	3.40%	0.00%	3.40%
Parlier	61.31%	38.69%	0.44%	1.64%	1.42%	3.50%
Reedley	57.30%	42.70%	1.01%	2.03%	1.09%	4.13%
Sanger	62.00%	38.00%	0.74%	1.93%	1.32%	3.99%
Selma	62.00%	38.00%	0.74%	1.93%	1.32%	3.99%
Unincorporated Area	66.37%	33.63%	0.68%	2.76%	4.26%	7.71%
Westside North Total	51.84%	48.16%	1.42%	2.14%	3.20%	6.76%
Firebaugh	58.58%	41.42%	2.95%	6.42%	2.72%	12.08%
Kerman	58.13%	41.87%	2.28%	1.30%	0.00%	3.57%
Mendota	44.25%	55.75%	0.00%	2.24%	1.86%	4.10%
San Joaquin	50.85%	49.15%	1.24%	2.02%	1.77%	5.03%
Unincorporated Area	50.74%	49.26%	1.22%	1.66%	4.46%	7.34%
Westside South Total	47.76%	52.24%	2.75%	3.47%	1.49%	7.71%
Coalinga	58.26%	41.74%	3.43%	4.16%	1.87%	9.46%
Huron	33.91%	66.09%	0.00%	2.19%	0.50%	2.69%
Unincorporated Area	27.68%	72.32%	5.20%	1.46%	1.43%	8.09%
Sierra Nevada Total	80.27%	19.73%	3.45%	1.60%	31.71%	36.76%
Unincorporated Area	80.27%	19.73%	3.45%	1.60%	31.71%	36.76%
Incorporated Total	53.08%	46.92%	1.29%	3.27%	0.95%	5.51%
Unincorporated Total	69.15%	30.85%	1.62%	1.45%	7.60%	10.68%
County Total	56.48%	43.52%	1.32%	2.91%	2.35%	6.58%

A normal market removal rate of 0.9% of the year-round housing units is utilized, again as provided by HCD. This removal rate is the number of units to be torn down, boarded up, destroyed by fire or changed to other uses.

The basic construction need for each jurisdiction is calculated as follows:

1. Determine the number of housing units needed at the end of the planning period, June 30, 2013, with an allowance for vacant units.
 - a. Multiply the estimated June 30, 2013 number of households for each jurisdiction (from Table 15) by the percentage of total households within that jurisdiction that were owner-occupied (from Table 16). Divide by the “actual” occupancy rate of owner-occupied housing, or 98.2%, utilized for all jurisdictions pursuant to HCD. (As noted above, 1.8% of the owner occupied units are estimated to be vacant for sale.)
 - b. Add to the number in a. the estimated June 30, 2013 number of households for each jurisdiction (from Table 15) multiplied by the percentage of total households within that jurisdiction that were renter-occupied (from Table 16). Divide by the occupancy rate of renter-occupied housing, or 95.0%, also utilized for all jurisdictions pursuant to HCD. (Again, as noted above, 5% of the renter occupied units are estimated to be vacant for rent.)
 - c. Divide b. by the “other” vacancy rate for each jurisdiction (from Table 16). Post the results to column 4 of Table 17.
2. Determine for each jurisdiction the number of housing units needed to accommodate population growth from the beginning of the planning period on January 1, 2006 to the end of the planning period on June 30, 2013.
 - a. Subtract from the number of housing units needed on June 30, 2013 (determined in Step 1 above), the existing number of housing units on January 1, 2006 (from Table 4). Post the results to column 5 of Table 17.
3. Determine for each jurisdiction the normal market removal of housing units. These are housing units that will be torn down, boarded up, destroyed by fire, changed to commercial use, etc.
 - a. In accordance with methodology provided by HCD, multiply the January 1, 2006 number of housing units by the replacement allowance rate provided by HCD of 0.9%. Post the results to column 6 of Table 17.
4. Determine by jurisdiction and market area the total basic construction need during the planning period extending from January 1, 2006 to June 30, 2013.
 - a. Add the number of units needed to accommodate growth (determined in Step Two) to the number of housing units projected to be removed (determined in Step Three). Post the results to column 7 of Table 17.

Table 17
Basic Construction Needs
January 1, 2006 to June 30, 2013

Market Area	City/Unincorporated	2006 Units	2013 Units	Growth	Normal Market Removals	Total Units Needed
FCMA	Clovis	32,458	47,517	15,059	136	15,195
	Fresno	160,446	180,940	20,494	184	20,678
	Unincorporated	28,138	29,281	1,143	10	1,153
	FCMA Total	221,042	257,738	36,696	330	37,027
East Valley	Fowler	1,519	2,064	545	5	550
	Kingsburg	4,023	5,422	1,399	13	1,411
	Orange Cove	2,153	2,925	772	7	779
	Parlier	2,990	3,564	574	5	580
	Reedley	6,570	7,907	1,337	12	1,349
	Sanger	6,527	8,856	2,329	21	2,350
	Selma	6,701	8,592	1,891	17	1,909
	Unincorporated	11,561	12,350	789	7	796
	East Valley Total	42,044	51,682	9,638	87	9,724
Westside North	Firebaugh	1,806	2,182	376	3	379
	Kerman	3,555	5,953	2,398	22	2,420
	Mendota	2,039	2,395	356	3	359
	San Joaquin	822	1,020	198	2	200
	Unincorporated	9,811	10,436	625	6	631
	Westside North Total	18,033	21,986	3,953	36	3,988
Westside South	Coalinga	3,988	4,102	114	1	115
	Huron	1,614	2,086	472	4	476
	Unincorporated	864	1,002	138	1	139
	Westside South Total	6,466	7,190	724	7	730
Sierra Nevada	Unincorporated	9,823	10,489	666	6	672
	Sierra Nevada Total	9,823	10,489	666	6	672
Total County	Incorp. Total	237,211	285,526	48,315	435	48,750
	Unincorp. Total	60,197	63,558	3,361	30	3,391
	County Total	297,408	349,084	51,676	465	52,141

The final step is to allocate the Basic Construction Need figure for each jurisdiction to the four income groups. This is accomplished by multiplying each jurisdiction's Basic Construction Need figure by the percentage growth of households during the planning period in each income group in each jurisdiction. The results are provided in Table 18.

Table 18
Estimated Housing Construction Need by Jurisdiction and Income Group
January 1, 2006 to June 30, 2013

Market Area	City/Unincorporated	Very Low	Low	Moderate	Above Moderate	Total
FCMA	Clovis	3,174	2,291	2,678	7,052	15,195
	Fresno	4,705	3,202	3,639	9,132	20,678
	Unincorporated	452	233	224	244	1,153
	FCMA Total	8,331	5,725	6,541	16,429	37,027
East Valley	Fowler	130	94	106	220	550
	Kingsburg	308	227	272	604	1,411
	Orange Cove	213	157	145	263	779
	Parlier	139	102	114	225	580
	Reedley	311	231	263	544	1,349
	Sanger	561	403	465	921	2,350
	Selma	435	327	380	767	1,909
	Unincorporated	252	165	185	195	796
East Valley Total	2,349	1,706	1,930	3,739	9,724	
Westside North	Firebaugh	99	79	78	123	379
	Kerman	689	419	495	817	2,420
	Mendota	89	71	73	126	359
	San Joaquin	53	42	40	64	200
	Unincorporated	201	116	133	181	631
Westside North Total	1,131	727	819	1,311	3,988	
Westside South	Coalinga	35	23	30	27	115
	Huron	126	80	99	170	476
	Unincorporated	60	12	15	52	139
	Westside South Total	221	116	145	248	730
Sierra Nevada	Unincorporated	114	86	116	356	672
	Sierra Nevada Total	114	86	116	356	672
Total County	Incorp. Total	11,068	7,748	8,878	21,056	48,750
	Unincorp. Total	1,080	612	672	1,027	3,391
	County Total	12,147	8,360	9,551	22,083	52,141

MANUAL ADJUSTMENTS

Government Code Section 65584.05 provides that within 60 days following receipt of the draft allocation, a local government may request from the Fresno COG a revision of its share of the regional housing need in accordance with the factors described in paragraphs (1) to (9), inclusive, of subdivision (d) of Section 65584.04. The request for a revised share shall be based upon comparable data available for all affected jurisdictions and accepted planning methodology, and supported by adequate documentation.

The City of Kingsburg and the County of Fresno submitted timely letters requesting reduced allocations for their jurisdictions from those determined in the draft RHNA Plan. However, since the total county allocation must be maintained, any reduction in one jurisdiction will require an increased allocation in one or more other jurisdictions. Consequently, COG staff conducted meetings on August 17 and August 24,

2007, with jurisdictions within the Fresno Clovis Metropolitan Area (FCMA) and the East Valley market areas to consider the requested revisions and determine if jurisdictions were willing to modify their allocations.

As a result of these meetings and subsequent discussions and correspondence, RHNA Plan allocations for Kingsburg and the County of Fresno were reduced. This was accomplished because the cities of Clovis, Fresno, Parlier and Selma agreed to somewhat higher allocations, necessary in order to maintain the total county allocation. The specific revisions are as follows:

Within the FCMA Market Area:

- Clovis accepted 203 units from the County (40 very low, 32 low, 36 moderate, and 95 above moderate)
- Fresno accepted 293 units from the County (115 very low, 59 low, 57 moderate, and 62 above moderate)

Within the East Valley Market Area:

- Selma accepted 200 units from Kingsburg (100 moderate and 100 above moderate)
- Selma accepted 60 units from the County (10 low, 25 moderate, and 25 above moderate)
- Parlier accepted 60 units from the County (30 moderate and 30 above moderate)

These jurisdictions accepted these additional units in the spirit of regional cooperation, without which a very difficult state mandate would have been made even more so. Table 19 of the 2007 Fresno County RHNA Plan includes all of these revisions and provides the final allocations by income group for all Fresno County jurisdictions.

The State Department of Housing and Community Development was consulted regarding language in the following four paragraphs. It clarifies that when necessary a city can include an adequate program action in its housing element to utilize land area within its Sphere of Influence to meet the requirement to provide adequate sites to accommodate all of its RHNA Plan allocation by income category. This clarification provides the basis for making mutually agreed transfers of housing need allocation from the County to a city to avoid a cumbersome administrative process in determining the transfer of housing need from the County to a particular city due to annexation.

The 2007 RHNA Plan provides the total housing need allocation by income category for each city in the County, for the unincorporated County, and for the total County. Each city and the County must identify in its housing element an inventory of adequate sites to accommodate its housing need allocation by income category. The sum total of housing need by income category for each of the cities and the unincorporated County cannot be less than the total County housing construction need by income category identified in the RHNA Plan.

A city and the County cannot both claim the same land area in their respective housing elements in order to provide an inventory of adequate sites to accommodate their respective allocation. Some cities in Fresno County may be able to accommodate their respective allocations within their existing jurisdictional boundaries. Other cities, however, may need to annex land area within their sphere of influence in order to provide an inventory of adequate sites to accommodate their respective allocations. In fact, both the City of Clovis and the City of Fresno, in letters agreeing to accept a portion of the County's FCMA allocation, note that they will use all or part of the area within their respective spheres of influence to comply with their final allocations. This is likely the case with many other jurisdictions within Fresno County as well.

In the case of a city proposing to annex land to accommodate any unmet portion of its RHNA allocation, the housing element must include an annexation program to address the remaining allocation. The program must specify actions the city will take early enough within the planning period to indicate annexation can be completed to enable adequate development to occur to meet the remaining RHNA allocation before the end of the planning period. For the land area to be annexed, the program must address appropriate zoning, development standards, and infrastructure capacity to determine, by income category, total residential development capacity. A city can not include in its housing element land proposed to be annexed that is included in the County's housing element or take credit for sites in which the County issued building permits unless the County, in writing, grants approval and commits to appropriately amending its housing element within six months from the date a revised determination of housing need has been finalized. A transfer or revised determination of housing need allocation during the planning period can only occur pursuant to Government Code Section 65584.07.

If a city through its annexation program is unable to provide adequate sites during the planning period to accommodate sufficient development, it must specify a program that commits the City, early enough in the planning period, to revise its land use controls and/or land inventory to provide adequate sites within its jurisdictional boundary to accommodate all the remaining housing need allocation for each income category.

Table 19
Final Estimated Housing Construction Need
by Jurisdiction and Income Group
January 1, 2006 to June 30, 2013

Market Area	City/Unincorporated	Very Low	Low	Moderate	Above Moderate	Total
FCMA	Clovis	3,214	2,323	2,714	7,147	15,398
	Fresno	4,820	3,260	3,696	9,195	20,971
	Unincorporated	297	142	131	88	658
	FCMA Total	8,331	5,725	6,541	16,430	37,027
East Valley	Fowler	130	94	106	220	550
	Kingsburg	308	227	172	504	1,211
	Orange Cove	213	157	145	263	778
	Parlier	139	102	144	255	640
	Reedley	311	231	263	544	1,349
	Sanger	561	403	465	921	2,350
	Selma	435	337	505	892	2,169
	Unincorporated	252	155	130	140	677
	East Valley Total	2,349	1,706	1,930	3,739	9,724
Westside North	Firebaugh	99	79	78	123	379
	Kerman	689	419	495	817	2,420
	Mendota	89	71	73	126	359
	San Joaquin	53	42	40	64	199
	Unincorporated	201	116	133	181	631
Westside North Total	1,131	727	819	1,311	3,988	
Westside South	Coalinga	35	23	30	27	115
	Huron	126	80	99	170	475
	Unincorporated	60	12	15	52	139
	Westside South Total	221	115	144	249	729
Sierra Nevada	Unincorporated	114	86	116	356	672
	Sierra Nevada Total	114	86	116	356	672
Total County	Incorp. Total	11,222	7,848	9,026	21,269	49,366
	Unincorp. Total	925	511	525	869	2,777
	County Total	12,147	8,359	9,550	22,085	52,142

STATE HCD REVIEW OF FINAL 2007 RHNA

The Fresno COG approved the 2007 Fresno County Regional Housing Needs Allocation (RHNA) Plan on November 29, 2007. Government Code Section 65584.01 states that within 60 days of adoption by the council of governments, the State Department of Housing and Community Development (HCD) shall determine whether or not the final allocation plan is consistent with the existing and projected housing need for the region.

HCD reviewed the 2007 Fresno County RHNA and noted that the housing need figure determined for Fresno County of 52,142 units had been fully allocated to the jurisdictions within the County. HCD further noted, however, that the total County allocations by income group were not consistent with the figures provided by HCD, as they must be pursuant to statute. Consequently, staff made technical revisions to the income group calculations for each jurisdiction, which additionally affected very slightly the total allocation for each jurisdiction (from 5 additional units to 14 fewer units).

The Fresno COG Board approved Revised Table 19 incorporating these technical revisions at its meeting on January 24, 2008. Revised Table 19 supersedes the RHNA figures displayed in both original Tables 18 and 19.

**Revised Table 19
Final Estimated Housing Construction Need
by Jurisdiction and Income Group
January 1, 2006 to June 30, 2013**

Market Area	City/Unincorporated	Very Low	Low	Moderate	Above Moderate	Total
FCMA	Clovis	3,275	2,354	2,681	7,073	15,384
	Fresno	4,912	3,304	3,651	9,100	20,968
	Unincorporated	303	144	129	87	664
	FCMA Total	8,490	5,803	6,462	16,260	37,015
East Valley	Fowler	132	96	105	218	551
	Kingsburg	314	230	170	499	1,213
	Orange Cove	218	159	144	260	781
	Parlier	142	104	142	252	639
	Reedley	317	234	260	539	1,350
	Sanger	572	408	459	912	2,351
	Selma	444	341	499	883	2,166
	Unincorporated	257	157	128	138	680
	East Valley Total	2,394	1,729	1,907	3,700	9,730
Westside North	Firebaugh	101	80	77	122	380
	Kerman	702	425	489	809	2,424
	Mendota	91	72	72	124	359
	San Joaquin	54	43	40	63	200
	Unincorporated	205	117	132	179	633
	Westside North Total	1,153	737	809	1,297	3,996
Westside South	Coalinga	35	24	30	26	115
	Huron	129	81	98	168	477
	Unincorporated	61	12	15	51	140
	Westside South Total	226	116	142	247	731
Sierra Nevada	Unincorporated	116	88	114	352	670
	Sierra Nevada Total	116	88	114	352	670
Total County	Incorp. Total	11,436	7,955	8,917	21,048	49,357
	Unincorp. Total	943	518	518	808	2,786
	County Total	12,379	8,473	9,434	21,856	52,142

Appendix

Letter from HCD dated September 8, 2006

Resolution No. 2007-07

Survey of Local Jurisdictions

City of Kingsburg letter dated June 7, 2007 requesting revisions

County of Fresno letter dated June 22, 2007 requesting revisions

Resolution No. 2007-49 Approving the 2007 Fresno
County Regional Housing Needs Allocation Plan

DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
DIVISION OF HOUSING POLICY DEVELOPMENT

1300 Thibe Street, Suite 430
P. O. Box 992046
Sacramento, CA 94252-2053
(916) 323 3177
FAX (916) 327-2643



September 8, 2006

Ms. Barbara Goodwin, Executive Director
Fresno Council of Governments
2035 Tulare Street, Suite 201
Fresno, CA 93721

Dear Ms. Goodwin:

RE: Regional Housing Needs Determination

This letter transmits Fresno County's Regional Housing Needs Determination upon the conclusion of the consultation process with Fresno Council of Governments (COG) as part of its important role in advancing the State's housing policies in the Fresno County region. Pursuant to State housing element law (Government Code Section 65584 - 65584.01), the Department of Housing and Community Development (Department) is required to provide the COG its determination of Fresno County's existing and projected housing needs.

The attached determination reflects the minimum housing need for Fresno County to enable the COG to prepare its new Regional Housing Needs Plan in accordance with Government Code Sections 65584.04-05 for use in updating the housing elements of each general plan within the County (see Attachment I). Housing elements are required to be updated by June 30, 2008 to accommodate each local government's share of the regional housing need pursuant to Government Code Section 65588(c)(3). Regarding local government's regional housing need allocation, credit may be taken for housing units permitted since the January 2006 baseline of the housing element planning period ending in 2013.

The Department conducted outreach on this regional housing needs assessment process, in consultation Mr. Clark Thompson and Ms. Kathy Chung, of your staff, since late spring of this year. This included a meeting on June 1, 2006 at your office to brief COG staff and representatives of member cities and Fresno County on applicable requirements, as amended effective in 2005. Department staff noted, for example, that the methodology to be developed by the COG involves new requirements relating to development of the allocation and factors to be considered.

This determination has resulted from consultation with COG staff and the Department of Finance's (DOF) Demographic Research Unit. Consultation was completed on September 5, 2006 with Mr. Thompson when agreement was reached concerning the methodology and assumptions for population growth and housing need applicable to Fresno County during the allocation period.

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BY: _____
FRESNO CO

Ms. Barbara Goodwin, Executive Director
Page 2

The Regional Housing Needs Determination for Fresno County has been calculated from a baseline of January 2006 through the end of the housing element planning period ending June 2013. This determination projects the minimum housing need to be accommodated in the region over this period. In light of the rate of population growth in the region, jurisdictions should consider planning for housing need above the minimum determination.

The Regional Housing Needs Plan developed by the COG is required to be consistent with the following objectives, as set forth in more detail in statute (Section 65584(d)):

- (1) Increasing the housing supply and the mix of housing types, tenure, and affordability;
- (2) Promoting infill development and socioeconomic equity, protection of environmental and agricultural resources, and encouragement of efficient development patterns;
- (3) Promoting an improved intraregional relationship between jobs and housing; and
- (4) Balancing the distribution of households by income category.

The Department is available to further discuss development and implementation of Fresno County's Regional Housing Needs Plan and assist the County and cities in addressing local housing needs. Please contact Glen Campora at (916) 327-2640.

Sincerely,



Cathy E. Creswell
Deputy Director

Enclosures

cc: Clark Thompson, Planning Coordinator, Fresno Council of Governments
Kathy Chung, Planning Coordinator, Fresno Council of Governments

Attachment 1
Regional Housing Need Determination
Fresno County
For the Period January 2006 Through June 30, 2013

<u>Income Category</u>	<u>Housing Unit Need</u>	<u>Percent</u>
Very Low	12,379	23.8
Low	8,473	16.2
Moderate	9,434	18.1
Above Moderate	<u>21,856</u>	<u>41.9</u>
Total	52,142	100%

Attachment 2

**Explanation of Fresno County Regional Housing Need Determination
For the Period January 1, 2006 Through June 30, 2013**

Methodology, Assumptions, and Data Sources Used to Project Housing Unit Need:

1. Household (HH) growth (50,078 "occupied housing units" 1/1/2006): estimate by California Department of Finance (DOF) in its E-5 report (Population and Housing Estimates for Cities, Counties and the State, 2001-2006, with 2000 Benchmark, May 2006). Population projections for 7/1/2013 are based on DOF's P-3 report (Population Projections by Race/Ethnicity, Gender and Age for California and Its Counties 2000-2050, May 2004). DOF 2013 projected HHs are derived using the cohort-component method by applying age- and ethnicity-specific HH formation ratios from Census 2000 to the projected population. Projected change in population (99,849) reflects the change between January 1, 2006 (899,517) through June 30, 2013 (999,366). Projected change in HH growth (50,078) also reflects the change between January 1, 2006 (278,195) through June 30, 2013 (328,273). Projected HH growth was derived from averaging Census 2000 HH formation ratios with trended HH formation ratios that Fresno COG used in projections and then multiplying the derived HH formation ratios against DOF's 2013 projected HH population change. This HH growth reflects lower household formation ratios compared to those of the 1990 Census which would yield projected HH growth of 72,575 and total housing unit need of 75,566.
2. Homeowner and Renter households (HHs): allocation based on Census 2000 proportion of owner-occupied HHs (56.5%) held constant through projection period. Renter HHs reflect the difference in subtracting homeowner HHs from projected HH growth.
3. Vacancy allowance: rates of 1.8% (owner) and 5.0% (renter) reflect adjustments from standard targets of 2.0% and 6.0%, respectively, for current conditions. Standard targets identified by Office of Planning and Research, Economic Practices Manual (1984:37).
4. Replacement allowance: empirical demolition rate per housing unit averages .06% per year for 2000 through 2005 based on DOF demolition permit data (990 total demolition permits in Fresno county, 2000-2005). This number was adjusted to .12% per year to account for missing permits and use conversions not involving demolition. This figure was multiplied by 7.5 (to derive percentage replacement over the entire planning period) to yield the .9% replacement allowance rate.
5. Income category allocation: each income category was calculated by multiplying total housing need by the proportion of HHs in each income category based on Fresno County median income (Census 2000) and income definitions (Health and Safety Code Sections 50079.6 and 50105, et.seq.).

Housing Unit Need Projection:

Household growth, Census 2000 headship rates (1)		50,078
Homeowner HHs (2)	56.5%	28,294
Homeowner HH vacancy allowance (3)	1.8%	509
Renter HHs	43.5%	21,784
Renter HHs vacancy allowance (3)	5.0%	1,089
	Subtotal	51,676
Replacement allowance (4)	0.9%	466
	Total	52,142

BEFORE THE
COUNCIL OF FRESNO COUNTY GOVERNMENTS
RESOLUTION NO. 2007-07

In the Matter of:)
2007 Regional Housing)
Need Allocation Plan)
_____)

RESOLUTION OF APPROVAL
METHODOLOGY FOR 2007
REGIONAL HOUSING NEED
ALLOCATION PLAN

WHEREAS, the Council of Fresno County Governments (COG) is the Regional Transportation Planning Agency for Fresno County; and

WHEREAS, the overarching purposes of the 2007 Fresno County Regional Housing Need Allocation Plan (RHNA Plan), along with similar RHNA Plans developed for other regions of the state, are to address the statewide concern for 'decent housing and a suitable living environment for every California family,' and to reflect the shared responsibility among local governments for accommodating the housing needs of all economic levels; and

WHEREAS, the allocation of the regional housing need, by income category, to individual cities and counties within a region is typically determined by the region's COG; and

WHEREAS, the Fresno COG is responsible for preparing the RHNA Plan; and

WHEREAS, Fresno COG staff and the Policy Advisory Committee are recommending that the same methodology successfully used in the 2001 RHNA Plan and earlier RHNA Plans be used in the 2007 RHNA Plan; and

WHEREAS, the methodology is acceptable to HCD, is relatively straightforward to understand and implement, reflects a city-centered and balanced development pattern, and allows for the ability to make manual adjustments to each jurisdiction's allocation of the regional housing construction need; and

WHEREAS, housing market areas are used throughout the RHNA Plan in the gathering, analysis, and presentation of data; and

WHEREAS, Fresno COG staff and the Policy Advisory Committee believe that the same five market areas used in the 2001 RHNA Plan remain valid and recommend their use in the 2007 RHNA Plan; and

WHEREAS, the 60-day public comment period of the methodology to be used in the development of the Regional Housing Needs Allocation Plan was initiated on December 8, 2006; and

WHEREAS, a public hearing was conducted on February 22, 2007 to hear and consider comments on the methodology for the 2007 RHNA Plan.

NOW, THEREFORE, BE IT RESOLVED, that the Council of Fresno County Governments adopts the methodology for the 2007 Fresno County Regional Housing Needs Allocation Plan.

THE FOREGOING RESOLUTION was passed and adopted by the Council of Fresno County Governments this 22nd day of February, 2007.

AYES: Clovis, Coalinga, Firebaugh, Fowler, Fresno, Huron, Kerman, Kingsburg, Mendota, Orange Cove, Parlier, Reedley, San Joaquin, Sanger, Selma & Fresno County

NOES: None

ABSTAIN: None

ABSENT: None

ATTEST:

Signed: _____

Trinidad M. Rodriguez, Chairman

I hereby certify that the foregoing is a true copy of a resolution of the Council of Fresno County Governments duly adopted at a regular meeting thereof held on the 22nd day of February, 2007.

Signed: Barbara Goodwin
Barbara Goodwin, Executive Director

Survey

Regional Housing Needs Allocation (RHNA) Plan

The purpose of this survey is to gather information regarding local government infrastructure, housing market, and other local conditions that could influence the development of a methodology for distributing the existing and projected regional housing need to cities within Fresno County and to the County itself. None of the information received in response to this survey may be used as a basis for reducing the total housing need established for Fresno County. Furthermore, the share of the regional housing need distributed to a jurisdiction represents a planning objective, not a construction quota, to be addressed by the jurisdiction in its Housing Element.

The methodology used in the development of the RHNA Plan, as with previous RHNA Plans, will be very objective. However, the final distribution of regional housing need may result in part from negotiations among various agencies. Information developed from this survey will be most appropriately utilized during this negotiation period, should it be necessary. Other sources of information will also be utilized including, for example, the COG Traffic Model, which has information on jobs/housing ratios.

In a few instances, it may be difficult to know what the survey question is trying to get at (the questions were taken directly from statute). Please do not hesitate to contact Clark Thompson at 233-4148 or by email at clarkt@fresnocog.org to discuss. For the other questions, please utilize only sufficient, **readily-available** data in support of your answer. Also, please let Clark know if you would like the survey emailed to you.

1. Would you say your jurisdiction is different than, or pretty much the same as, other jurisdictions in Fresno County regarding existing and projected jobs and housing relationship? If different, indicate how.

2. Opportunities and constraints to development of additional housing:

- a. Is there a lack of capacity for sewer or water service due to state laws, regulations or regulatory actions, or supply and/or distribution decisions made by a sewer or water service provider *other than the local jurisdiction* that precludes your jurisdiction from providing necessary infrastructure for additional development during the planning period? If so, please explain.

b. Is there available land suitable for urban development or for conversion to residential land use, including underutilized land use and opportunities for infill development and increased residential densities, within your jurisdiction and sphere of influence? If not, indicate why. [Note: In developing the RHNA Plan, COG 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.]

c. Are there lands within your jurisdiction that are 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? If so, please identify.

d. **For Fresno County only.** Are there county policies to preserve prime agricultural land within the unincorporated area? If so, what are they?

3. **For Fresno COG only.** What is the distribution of household growth assumed for purposes of a comparable period of regional transportation plans and what are the opportunities to maximize the use of public transportation and existing transportation infrastructure?

4. Do you believe the market demand for housing in your jurisdiction, relative to the market demand for housing in other Fresno County jurisdictions, will change significantly between January 1, 2006 and July 1, 2013? If so, explain.

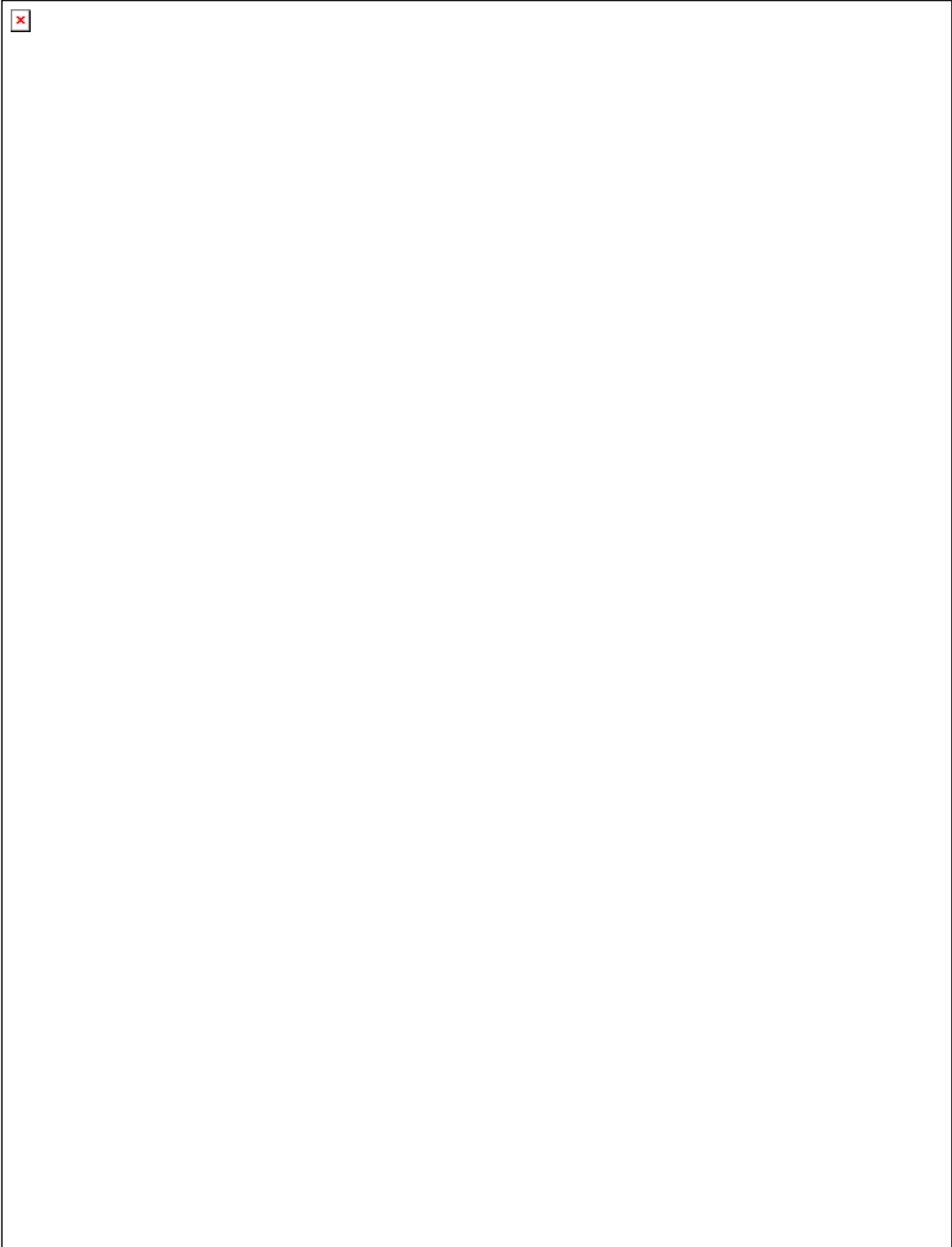
5. **For Fresno County only.** Do agreements exist between the county and the cities in the county to direct growth toward incorporated areas of the county? If so, please explain.

6. **For Housing Authorities of Fresno only.** Has there been a loss of units contained in assisted housing developments that changed to non-low-income use through mortgage prepayment, subsidy contract expirations, or termination of use restrictions.

7. Do you think that high housing costs are more of a burden in your jurisdiction than they are in other jurisdictions in Fresno County?

8. Do you think that the housing needs of farmworkers are a more serious issue in your jurisdiction than in the other jurisdictions in Fresno County.

9. Are there any other factors which in your view should be incorporated into the methodology that allocates regional housing needs to the individual jurisdictions?



that reflects the 20+ year growth history of the City based on Building Division records. You will observe that the period 2000-2005 is an anomaly.

Compounding this situation is the fact that some of Kingsburg's neighboring communities in the East Valley Market Area grew more slowly during the 2000-2005 time frame than they have historically or aim to currently. The 2007 RHNA analysis indicates that they capture a smaller share of the market area growth, and Kingsburg a larger share, than is currently realistic.

For instance, Reedley put development on hold for 2-3 years while going through a comprehensive specific plan process. Other communities had to curb growth while overcoming infrastructure deficiencies. With the impending construction of the State Route 180 freeway to the Sanger area, residential development in that city is now booming, where it was not before. And while Selma's new housing construction was not so much greater than Kingsburg's from 2000 to 2005 (853 dwelling units compared to 640, according to Table 13 in the 2007 RHNA Plan), Selma's population is already more than double Kingsburg's, and Selma officials are vocal about their city's pro-growth attitude and their plans for extremely large housing projects. They are publicly pressing officials of the regional sewage treatment provider, the Selma-Kingsburg-Fowler County Sanitation District, to provide enough capacity to serve thousands of new housing units in their city in the next several years.

In contrast, housing construction in Kingsburg has been slow to rebound after implementation of the Growth Management System in mid-2005. Building permits for only two new homes were pulled during all of 2006, and only a handful of permits have been issued so far in 2007.

The Growth Management System consists of an addition to the City Charter, revised General Plan policies, an enforcement ordinance setting up a growth allocation system, and an Environmental Impact Report. Voters approved the amendment to the Charter calling for growth control with an 81.5 percent affirmative vote, demonstrating that sentiment for regulated growth in the City of Kingsburg is very strong.

The Growth Management System Ordinance calls for the awarding of housing construction allocations annually based on a cap sufficient to accommodate the City's 2001 RHNA Plan share of 832 housing units over the 7-1/2 year life of the Plan. The basic annual allocation is 115 housing units per year, with some exemptions and allowances, coinciding nicely with the long-standing 3 percent policy.

The 2007 Plan calls for Kingsburg to absorb 1,411 housing units, a 70 percent increase over the 2001 plan. Over the 7-1/2 year life of the plan Kingsburg would have to average 188 new housing units per year. However, since only two new units were constructed during the first year of the plan (2006), the average gets pushed up to 217 housing units a year for the 6-1/2 year period 2007 to mid-2013. That is over 100 dwelling units per year more than the Growth Management System ordinance currently accommodates. City officials were well aware that the growth allocation cap would have to be adjusted from time to time, but an 89 percent increase from 115 to 217 units per year would be considered unreasonable and unacceptable to the citizenry.

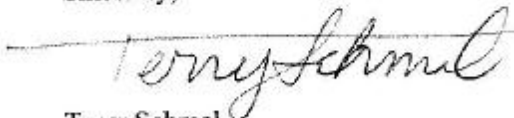
Kingsburg is fully prepared to accept its fair share of responsibility for new housing development in the region. Its managed growth policy is intended to accommodate a substantial sustainable rate of residential development while ensuring that the ability of the city and schools to provide facilities and services is not outstripped. A 3 percent growth rate means that a community doubles in size in 23 to 24 years.

At a 3 percent rate of growth, over 7-1/2 years Kingsburg would add about 1,000 housing units to its January 1, 2006, inventory of 4,023. Such a number Kingsburg officials regard as a more reasonable RHNA Plan allocation; it represents a 20 percent increase over Kingsburg's 2001 RHNA Plan allocation of 832.

We believe a manual adjustment reducing Kingsburg's allocation by several hundred housing units could be accomplished by dividing those housing units among neighboring jurisdictions that are anticipating, preparing for and in some cases actively pursuing development of housing units well in excess of the allocations those communities would receive in the Revised Draft 2007 RHNA Plan. Kingsburg officials have contacted representatives of some of those jurisdictions regarding such a shift in allocations. While discussions have been slow to materialize, the proposal has not been rejected.

Thank you for your consideration of our request. Please contact me (897-5328) or City Manager Don Pauley (897-5821) for additional information.

Sincerely,



Terry Schmal
Planning and Development Director

City of Kingsburg housing construction - 1985 through 2006

A 3 percent average growth rate was adopted by General Plan policy in 1988. At a 3 percent rate of growth the population will double in between 23 and 24 years.

	Senior complex		Growth control		Second half 1980s
	1986	1987	1988	1989	1980s
Housing inventory	2,051	2,245	2,390	2,423	NEW
New units	194	145	33	102	598
Percentage increase	9.5%	6.5%	1.4%	4.2%	

	1990	1991	1992	1993	1994	1995	1996	1997	1998	1999	1990s
Housing inventory	2,525	2,592	2,667	2,743	2,865	2,947	3,001	3,088	3,181	3,246	NEW
New units	67	75	76	122	82	54	87	93	65	80	801
Percentage new	2.7%	2.9%	2.8%	4.4%	2.9%	1.8%	2.9%	3.0%	2.0%	2.5%	

	2000	2001	2002	2003	2004	2005	2006	2007	2000s
Housing inventory	3,326	3,458	3,559	3,698	3,900	3,981	4,030	4,032	NEW
New units	132	101	139	202	81	49	2	*	706
Percentage new	4.0%	2.9%	3.9%	5.5%	2.1%	1.2%	0.0%		
				Stopped annexing		New system			

1986 - The Park Kingsburg senior citizens complex, with over 100 housing units, was constructed.

1988 - General Plan growth policies were initiated. While they have been modified occasionally, most recently in 2005, they have been effective since.

2003 - A Growth Limitation Ordinance was enacted for 2 years that halted annexations of land for residential development.

2005 - The new Growth Management System Ordinance was adopted in July.

* Through the end of May between 5 and 10 permits for new housing units were issued in 2007.

Clark Thompson

From: Terry Schmal [tschmal@clearskye.net]
Sent: Thursday, November 09, 2006 4:07 PM
To: Clark Thompson
Subject: Survey

Sorry, Clark, that I missed the Tuesday deadline for the RHNA survey. I hope these responses still do some good and that it's OK to submit them this way.

1. Kingsburg is somewhat different than other jurisdictions in Fresno County when it comes to jobs-housing balance. Over the last 2-3 decades Kingsburg has developed into a bedroom community where residential growth has outstripped industrial and commercial growth several times over. The City is attempting to bring development into better balance by adopting a Growth Management System to hold housing growth at a steady 3 percent per year while stimulating industrial and commercial development and the creation of jobs. The City is in the process of annexing a large swath of the Golden State Industrial Corridor (about 450 acres) which should create many new opportunities for the stimulation of business.

2.a. The Selma-Kingsburg-Fowler County Sanitation District (S-K-F) is confronting the potential for capacity issues based on projected growth in the three cities it serves. With proper foresight and planning for plant and trunk line expansion and enhancements, sewer capacity is not expected to become a major constraint on development in Kingsburg.

2.b. Kingsburg's expansion is constrained by the Tulare County line cutting diagonally across the southeast side of downtown, the Sphere of Influence of the City of Selma on the northwest, and the S-K-F treatment plant to the west. The City is also committed to the preservation of some of the finest agricultural land to be found anywhere in the world to the east across Madsen Avenue. There is room for new development for the short term, but over the long term these barriers will become increasingly prominent.

2.c. There are no protected lands within the City of Kingsburg, but there are properties under Williamson Act contract adjacent to the City and sprinkled between the city limits and Sphere of Influence line.

2.d. County question. (County General Plan policies call for protection of agricultural land, and the Williamson Act program is one of the primary tools for enforcement. The Memorandum of Understanding between the County and the City of Kingsburg, executed late last year and effective for 15 years, also enforces policies that prevent speculative annexations and premature conversion of agricultural land.)

3. COG question. (Kingsburg has included a potential light rail corridor in its North Kingsburg Specific Plan and clustered higher densities of residential development around it with transit-oriented development in mind. However, that area is probably years away from development.)

4. The anticipation is that Kingsburg's Growth Management System will maintain residential growth at a fairly stable 3 percent per year level throughout the planning period and that Kingsburg will not be as susceptible to the peaks-and-valleys cycles that other parts of Fresno County may experience. The peaks will not be as high in Kingsburg because of the limitations of the growth allocation system, and pent-up demand and the desirability of the community will prevent the valleys from being as deep.

5. County question. (The Memorandum of Understanding exists in part for this purpose.)

6. Housing Authority question.

7. High housing costs are more of a burden in Kingsburg than other jurisdictions, especially those outside of the metropolitan area. It is our impression that home prices are higher in Kingsburg than any other jurisdiction in the County besides Clovis and possibly Fresno.

11/9/2006

8. Farmworker housing is a major issue in the region but does not seem to be one within Kingsburg's city limits. There are farm labor camps in the rural area some distance west of Kingsburg, and heavy farmworker populations in the rural unincorporated towns that are generally considered part of the Kingsburg district like London and Traver in Tulare County. However, city officials have not been made aware of demand for specialized housing for farmworkers in Kingsburg through such social services entities as the Kingsburg Community Assistance Program or local churches, or from other sources.

9. Since 1988 Kingsburg has had policies in the General Plan calling for a 3 percent growth rate, and the City has been successful in attaining that rate overall. From the 1990 census through the 2000 census to the 2005 State Department of Finance estimate, Kingsburg's population growth has been 3.0 percent, and the increase in the number of housing units is very similar. City and school district officials have determined that this is the rate of growth that Kingsburg can sustain while providing necessary facilities and services. It is a healthy rate of growth that means the City will double in population every 23 to 24 years despite the constraints caused by the Tulare County line and other barriers. We believe this is the target rate that should be reflected in the RHNA methodology.

Thanks, Clark. Please contact me with any questions.

Terry Schmal

Please note new e-mail address:

tschmal@cityofkingsburg.ca.gov

Planning and Development Director

City of Kingsburg

(559) 897-6551

11/9/2006



County of Fresno

DEPARTMENT OF PUBLIC WORKS AND PLANNING
ALAN WEAVER, DIRECTOR

June 22, 2007

RECEIVED

JUN 26 2007

BY: _____
FRESNO CO.

Barbara Goodwin, Executive Director
Council of Fresno County Governments
2035 Tulare Street, Ste. 201
Fresno, CA 93721

Dear Ms. Goodwin:

Subject: Fresno County Regional Housing Needs Allocation Plan

Thank you for the opportunity to review and comment upon the April 2007 draft of the Fresno County Regional Housing Needs Allocation Plan. The Council of Governments (COG) is to be complimented for the systematic and inclusive approach that has been taken in the compilation and refinement of the Housing Plan.

The County agrees that it is reasonable to use distribution of existing housing units as a starting point for allocation of new units through the Housing Plan. There are, however, mitigating circumstances and changing conditions that diminish the validity of some numbers produced by this methodology, especially with regard to the allocation of units in the Fresno-Clovis Metropolitan Area (FCMA) market area. The County advocates reduction of housing units allocated to unincorporated areas, especially in the metropolitan area, and adjustment in the income group allocation ratios.

Among the factors supporting these modifications is the County's General Plan. The Housing Plan acknowledges the guiding principles of the General Plan but does not fully reflect the County's level of commitment to these principles. The April 2007 draft of the Housing Plan makes reference to the County General Plan as methodology attribute 4 of its Study Approach (Page 2):

"The methodology reflects a city-centered and balanced development pattern that is substantially consistent with local agency general plans, including Fresno County's General Plan, adopted on October 3, 2000."

The Housing Plan's Estimated Housing Construction Need by Jurisdiction and Income Group Table (Table 18) calls for the unincorporated area to absorb 3,391 of 52,141 units.

DEVELOPMENT SERVICES DIVISION
2220 Tulare Street, Sixth Floor / Fresno, California 93721 / Phone (559) 262-4055 / 262-4029 / 462-4320 / 262-4022 / FAX 262-4893
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One third of the unincorporated area allocation, 1,153 units, is assigned to the FCMA. Yet the FCMA is an area that is particularly subject to conversion of unincorporated territory to the jurisdiction of the cities. The Housing Plan's section on Allocating Household Growth (Page 9) indicates that in some prior RHNA Plans, the number of unincorporated households within the FCMA market area was projected to decline:

"Prior to 1990 there had occurred a historic decline in the population of the of the unincorporated area of Fresno County, with regard to both the overall ratio of the unincorporated to incorporated population and a real decline in actual numbers. For example, the 1990 RHNA Plan indicated the number of unincorporated households within the FCMA market area actually declined by 11,733 households between 1980 and 1989, or from 27.42 percent of total FCMA market area households in 1980 to 14.75 percent in 1989. And while the percentage change during the same period for the other market areas was generally positive (the Westside South market area being the exception), it was less than ½ to 1 percent.

"Two factors in particular contributed to this declining unincorporated population: County policy relative to urban development in unincorporated areas and aggressive city annexation activities, particularly annexation of inhabited areas by the City of Fresno, between 1980 and 1989."

In the 1990 RHNA, the trend of a declining unincorporated population with the FCMA market area was not projected to continue. A manual adjustment to the growth trend was applied to reflect this.

"This manual adjustment was based on a determination that "institutional barriers" were expected to reduce significantly the rate of inhabited annexation activity during the 1989-1996 planning period."

Current projects indicate that inhabited annexation activity by Fresno and Clovis will be on the increase. In September 2006, during the period covered by the 2007 RHNA Plan, the City of Clovis completed the Locan-Nees Annexation, an inhabited annexation covering 520 acres and containing approximately 100 housing units. The City of Fresno is in the processing of beginning a Proactive Island Annexation Program. These projects would result in a decline in the unincorporated population of the FCMA market area, similar to that seen between 1980 and 1989.

The Housing Plan calls for 32 percent (1,080 units) of housing developed in the unincorporated area to be affordable to very low-income households, and 18 percent (612 units) to be affordable to low-income households. Housing units likely to be constructed in unincorporated areas are those that can be developed as a matter of right on predominantly large parcels. Ranch houses and custom homes on estate-size lots are likely to be affordable only to those households in the upper income brackets. It is excessive to project that 1,692 housing units – half of the unincorporated area total – will be affordable to households with incomes that are 80 percent of County median incomes or less.

The cost of land and economies of scale dictate that the most affordable dwelling units can be developed at urban densities. With the General Plan directing such density of development to cities, the Housing Plan income group allocations for unincorporated areas are unattainable.

Council of Fresno County Governments
June 22, 2007
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Thank you for your consideration of these recommendations. Enclosed is a copy of the Regional Housing Needs Allocation Plan Survey. Questions can be directed to me or to Bernard Jimenez, Manager of the Development Services Division, at (559) 262-4497.

Sincerely,



Bernard Jimenez, Division Manager

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Enclosure

Survey

Regional Housing Needs Allocation (RHNA) Plan

The purpose of this survey is to gather information regarding local government infrastructure, housing market, and other local conditions that could influence the development of a methodology for distributing the existing and projected regional housing need to cities within Fresno County and to the County itself. None of the information received in response to this survey may be used as a basis for reducing the total housing need established for Fresno County. Furthermore, the share of the regional housing need distributed to a jurisdiction represents a planning objective, not a construction quota, to be addressed by the jurisdiction in its Housing Element.

The methodology used in the development of the RHNA Plan, as with previous RHNA Plans, will be very objective. However, the final distribution of regional housing need may result in part from negotiations among various agencies. Information developed from this survey will be most appropriately utilized during this negotiation period, should it be necessary. Other sources of information will also be utilized including, for example, the COG Traffic Model, which has information on jobs/housing ratios.

In a few instances, it may be difficult to know what the survey question is trying to get at (the questions were taken directly from statute). Please do not hesitate to contact Clark Thompson at 233-4148 or by email at clarkt@fresnocog.org to discuss. For the other questions, please utilize only sufficient, readily-available data in support of your answer. Also, please let Clark know if you would like the survey emailed to you.

1. Would you say your jurisdiction is different than, or pretty much the same as, other jurisdictions in Fresno County regarding existing and projected jobs and housing relationship? If different, indicate how.

Fresno County differs from other jurisdictions within the County with regard to existing and projected job growth and housing. Fresno County generally plans and provides for more rural type development. Although many County residents work in the incorporated jurisdictions or other urbanized areas as these areas serve as the employment centers, there are also agriculturally based employment centers which tend to employ mainly residents of Fresno County. In 2000, agricultural employment accounted for 17.9 percent (58,900) of all employment in the County, according to the State Employment Development Department (EDD). As such, Fresno County also provides a disproportionate share of farm-worker housing when compared to other jurisdictions with Fresno County.

2. Opportunities and constraints to development of additional housing:

- a. Is there a lack of capacity for sewer or water service due to state laws, regulations or regulatory actions, or supply and/or distribution decisions made

by a sewer or water service provider *other than the local jurisdiction* that precludes your jurisdiction from providing necessary infrastructure for additional development during the planning period? If so, please explain.

There are many areas within the jurisdiction of Fresno County that are known to be water deficient which has a direct impact on the ability to develop housing. In addition, there are areas which do not contain soils that are conducive to individual septic systems which may then require tertiary treatment facilities. The cost for construction/maintenance of such a facility may not be economically feasible.

In addition, there are unincorporated communities within Fresno County in which community services are provided via a Community Services District. These Districts are governed by an independent Board of Directors and, depending on the number of service connections, may be regulated by the State of California. In some cases, the systems in these communities (Biola, Friant, Del Rey) do not have adequate capacity to accommodate additional development without major infrastructure improvements.

- b. Is there available land suitable for urban development or for conversion to residential land use, including underutilized land use and opportunities for infill development and increased residential densities, within your jurisdiction and sphere of influence? If not, indicate why. [Note: In developing the RHNA Plan, COG 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.]

There are some unincorporated communities within Fresno County that contain vacant land suitable for infill development. Fresno County is in the process of preparing updates for all the Community Plans and will be evaluating these communities with respect to opportunities for infill development, increased density, and mixed-use development.

In addition, there are areas within the County (County Islands) which are developed with very low density residential development on oversized lots. These oversized lots could present opportunities for infill development and increased residential densities.

- c. Are there lands within your jurisdiction that are 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? If so, please identify.

Within Fresno County there are vast areas protected under the State Williamson Act Program for agricultural land conservation. These parcels are either under Williamson Act Contracts or Farmland Security Zones. These parcels are located throughout the County totaling 1,529,265 acres and are typically zoned AE (Exclusive Agriculture), which limits land use generally to agricultural uses. In addition, the existence of the Contract further limits the land uses permitted on these parcels to strictly agricultural and uses that are closely incidental to the agricultural use.

There are also lands within Fresno County (foothill/mountain areas) that are under Federal Jurisdiction (National Parks) which would preclude certain residential development. In addition, these are lands designated as open space in the vicinity of rivers (Kings and San Joaquin).

- d. **For Fresno County only.** Are there county policies to preserve prime agricultural land within the unincorporated area? If so, what are they?

The Fresno County General Plan contains visions, goals and policies specifically intended to protect agricultural land and direct growth away from these lands. The Vision Statement of the General Plan includes the following language:

"The County sees its primary role to be the protector of prime agricultural lands, open space, recreational opportunities, and environmental quality, and the coordinator of countywide efforts to promote economic development."

"The plan seeks to protect its productive agricultural land as the county's most valuable natural resource and the historical basis of its economy through directing new urban growth to cities and existing unincorporated communities and by limiting the encroachment of incompatible development upon agricultural areas."

The Plan's Vision Statement further states:

"The plan promotes compact growth by directing most new urban development to incorporated cities and existing urban communities that already have the infrastructure to accommodate such growth. This plan assumes over 93 percent of new population growth and new job growth will occur within incorporated city spheres of influence and seven percent would occur in unincorporated areas (see Appendix A). Accordingly, this plan prohibits designation of new areas as Planned Rural Community and restricts the designation of

new areas for rural residential development while allowing for the orderly development of existing rural residential areas.”

The Goal of the County’s Agricultural Land Use Element (Goal LU-A) States:

“To promote the long-term conservation of productive and potentially-productive agricultural lands and to accommodate agricultural-support services and agriculturally-related activities that support the viability of agriculture and further the County’s economic development goals.”

With regard to the specific policies that promote/require the protection of agricultural land, below are a listing of the relevant polices and text that seek to preserve agricultural land. Policies that prevent division or the further division of agricultural land preserve those lands by limiting the creation of parcels that are smaller than needed to provide for a viable agricultural use and, once divided, could be developed with residences that conflict with farming practices (or vise-versa). Also below, there are policies that encourage commitment to the Williamson Act program which preserves agricultural land.

Policy LU-A.1 *“The County shall maintain agriculturally-designated areas for agriculture use and shall direct urban growth away from valuable agricultural lands to cities, unincorporated communities, and other areas planned for such development where public facilities and infrastructure are available.”*

Policy LU-A.6 *“The County shall maintain twenty (20) acres as the minimum permitted parcel size in areas designated Agriculture, except as provided in Policies LU-A.9, LUA.10, and LU-A.11. The County may require parcel sizes larger than twenty (20) acres based on zoning, local agricultural conditions, and to help ensure the viability of agricultural operations.”*

Policy LU-A.7 *“The County shall generally deny requests to create parcels less than the minimum size specified in Policy LU-A.6 based on concerns that these parcels are less viable economic farming units, and that the resultant increase in residential density increases the potential for conflict with normal agricultural practices on adjacent parcels. Evidence that the affected parcel may be an uneconomic farming unit due to its current size, soil conditions, or other factors shall not alone be considered a sufficient basis to grant an exception. The decision-making body shall consider the negative incremental and cumulative effects such land divisions have on the agricultural community.”*

Policy LU-A.12 *“In adopting land uses policies, regulations and programs, the County shall seek to protect agricultural activities from encroachment of incompatible land uses.”*

Policy LU-A.16 *"The County should consider the use of agricultural land preservation programs that improve the competitive capabilities of farms and ranches, thereby ensuring long-term conservation of viable agricultural operations. Examples of programs to be considered should include: land trusts; conservation easements; dedication incentives; new and continued Williamson Act contracts; Farmland Security Act contracts; the California Farmland Conservancy Program Fund; agricultural education programs; zoning regulations; agricultural mitigation fee program; urban growth boundaries; transfer of development rights; purchase of development rights; and agricultural buffer policies."*

Policy LU-A.17 *"The County shall accept California Land Conservation contracts on all designated agricultural land subject to location, acreage, and use limitations established by the County."*

3. **For Fresno COG only.** What is the distribution of household growth assumed for purposes of a comparable period of regional transportation plans and what are the opportunities to maximize the use of public transportation and existing transportation infrastructure?

4. Do you believe the market demand for housing in your jurisdiction, relative to the market demand for housing in other Fresno County jurisdictions, will change significantly between January 1, 2006 and July 1, 2013? If so, explain.

Permit activity for Fresno County has been on the rise since the mid 1990's and has not slowed. As additional residents are expected to arrive in Fresno County, it is anticipated that the demand for housing will increase. As indicated above, the County policies direct new urban development to the incorporated communities (cities). Housing demand for development within Fresno County has not typically included the very large urban subdivision projects, with some exceptions. It is anticipated however that as those areas within the cities and cities' spheres of influence develop, pressure will be placed on the surrounding unincorporated areas including the unincorporated communities which contain areas designated for urban development.

5. **For Fresno County only.** Do agreements exist between the county and the cities in the county to direct growth toward incorporated areas of the county? If so, please explain.

As indicated above, Fresno County's policies direct growth to cities (estimated 93%). Fresno County has a Memorandum of Understanding (MOU) with all incorporated jurisdictions within Fresno County (15). These MOU's stipulate and recognize the County General Plan Goals and Policies that direct growth to the

cities. Specifically, Goal LU-G is noted in the MOU's. Also, listed below are other Policies from the County General Plan that direct growth to the cities.

Goal LU-G "To direct urban development within city spheres of influence to existing incorporated cities and to ensure that all development in city fringe areas is well planned and adequately served by necessary public facilities and infrastructure and furthers countywide economic development goals."

Policy LU-G.1 "The County acknowledges that the cities have primary responsibility for planning within their LAFCO-adopted spheres of influence and are responsible for urban development and the provision of urban services within their spheres of influence."

Policy LU-G.7 "Within the spheres of influence and two (2) miles beyond, the County shall promote consultation between the cities and the County at the staff level in the early stages of preparing general plan amendments and other policy changes that may impact growth or the provision of urban services. Staff consultations, particularly concerning community plans, shall provide for meaningful participation in the policy formulation process and shall seek resolution of issues prior to presentation to the decision-making bodies."

Policy LU-G.14 "The County shall not approve any discretionary permit for new urban development within a city's sphere of influence unless the development proposal has first been referred to the city for consideration of possible annexation pursuant to the policies of this section and provisions of any applicable city/county memorandum of understanding."

6. **For Housing Authorities of Fresno only.** Has there been a loss of units contained in assisted housing developments that changed to non-low-income use through mortgage prepayment, subsidy contract expirations, or termination of use restrictions.

7. Do you think that high housing costs are more of a burden in your jurisdiction than they are in other jurisdictions in Fresno County?

No more than in any other jurisdiction within Fresno County.

8. Do you think that the housing needs of farmworkers are a more serious issue in your jurisdiction than in the other jurisdictions in Fresno County.

While there are provisions in the Fresno County Zoning Ordinance as well as recent legislation that provides for more flexible opportunities for farm-worker housing, as previously discussed, Fresno County provides a disproportionate share of farm-worker housing when compared to other jurisdictions with Fresno

County. According to the County's adopted Housing Element, it is estimated that, during the peak harvest months of April through October, the farm labor work force in the County more than doubles which further constricts the already strained housing supply and basic community services. .

Due to low wages and periods of unemployment, it is not uncommon to find farm-workers and their families living in extremely overcrowded conditions. Affordable housing is often lacking, so several families may live together in one house in order to share expenses. In addition to the general lack of affordable housing, another factor contributing to the housing shortage for farm-workers is the difficulty in renting housing with temporary lease periods which is the type housing needed based of the nature/duration of farm labor.

Based on these factors, additional affordable housing specifically designed for farm-worker households is needed in Fresno County and given the seasonal influx of farm-workers, farm-worker housing needs to be developed in enough housing to accommodate the peak demand. Therefore, addressing farm-worker housing is a more serious issue for Fresno County than in other jurisdictions in Fresno County.

9. Are there any other factors which in your view should be incorporated into the methodology that allocates regional housing needs to the individual jurisdictions?

As a County, Fresno County directs growth to the incorporated cities and urbanized unincorporated communities (noting that the majority of growth is occurring in cities – within the current Spheres of Influence). As such, allocations for Fresno County should take into account that it is the County's primary focus to protect agricultural land and not develop housing. Fresno County recommends that as the housing allocations are being developed, consideration be given to the County's share to reflect development in the expanding urban areas located within the various Cities' Spheres of Influence.

BEFORE THE
COUNCIL OF FRESNO COUNTY GOVERNMENTS
RESOLUTION NO. 2007-49

In the Matter of:

FRESNO COUNTY REGIONAL
HOUSING NEEDS ALLOCATION PLAN)

RESOLUTION OF APPROVAL
OF THE 2007 FRESNO COUNTY
REGIONAL HOUSING NEEDS
ALLOCATION PLAN

WHEREAS, cities and counties are required by State law to prepare and adopt a general plan with a housing element that addresses the need to attain State housing goals; and

WHEREAS, State law requires documentation of existing and projected housing needs for all income levels; and

WHEREAS, Government Code Section 65580 directs each city and county to address the housing needs of all segments of the community in their general plan's housing element; and

WHEREAS, existing and projected needs are to include the localities share of the regional housing need in accordance with Section 65584; and

WHEREAS, Section 65584 of the Government Code also directs councils of governments to prepare regional housing needs plans; and

WHEREAS, Section 65584 also sets forth State statutory requirements for councils of governments and requires that regional housing needs determinations make allocations specific to jurisdictions, including consideration of housing needs of all income levels; and

WHEREAS, State law requires that regional housing needs determinations seek to avoid further impaction of localities with relatively high proportions of lower income households.

NOW, THEREFORE, BE IT RESOLVED, that the 2007 Fresno County Regional Housing Needs Allocation Plan responds to State guidelines by identifying:

1. The housing needs of persons at all income levels within the areas significantly affected by jurisdictions within the Fresno County Planning Area;
2. Existing and projected housing need; and
3. A January 1, 2006 to June 30, 2013 time frame consistent with the statutory schedule.

BE IT FURTHER RESOLVED, that the Council of Fresno County Governments hereby approves the 2007 Fresno County Regional Housing Needs Allocation Plan as it meets the requirements of the State of California Housing Law for Regional Housing Plans.

THE FOREGOING RESOLUTION was passed and adopted by the Council of Fresno County Governments this 29th day of November, 2007.

AYES: Clovis, Firebaugh, Fowler, Fresno, Kerman, Kingsburg, Mendota, Orange Cove, Reedley, San Joaquin, Sanger, Selma and Fresno County

NOES: None

ABSTAIN: None

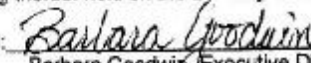
ABSENT: Coalinga, Huron and Farlier

ATTEST:

Signed:


Trinidad M. Rodriguez, Chairman

I hereby certify that the foregoing is a true copy of a resolution of the Council of Fresno County Governments duly adopted at a regular meeting thereof held on the 29th day of November, 2007.

Signed: 
Barbara Goodwin, Executive Director