



# **Regional Housing Needs Allocation (RHNA) Plan 2014-2022**

**Final  
July 2013**

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## SUMMARY

State law requires every city and county to prepare a Housing Element as part of its General Plan. These Housing Elements are reviewed by the California Department of Housing and Community Development (HCD) for compliance with State housing law. Jurisdictions are required to identify adequate sites to address their very low, low, moderate, and above moderate income housing needs based on their Regional Housing Needs Allocation (RHNA). In addition, each jurisdiction is required to submit an annual progress report on housing production by income category based on building permits issued, as well as on the status of its Housing Element program and policy implementation.

The RHNA process has three main components:

- RHNA Determination – HCD determines regional housing needs, in four income categories, for the region as a whole. HCD, in consultation with SBCAG and using information from SBCAG’s Regional Growth Forecast and the California Department of Finance population estimates, calculates a demographic housing need based on rates of household formation and vacancy rates. The County-wide RHNA determination for Santa Barbara County is 11,030 units.
- RHNA Allocation – The SBCAG RHNA process includes developing a methodology for allocating a share of the RHNA determination to the County and each city in the region in four income categories and then issuing a regional housing needs allocation based on that methodology. State law also requires the RHNA allocation to be consistent with the Regional Transportation Plan-Sustainable Communities Strategy.
- RHNA Integration – Each local government’s regional housing needs allocation is required to be accommodated in its local Housing Element within the statutory timeframe.

The RHNA determination of housing units by income level for each jurisdiction for the 2014 to 2022 planning period is shown in the following table. The last column shows the minimum total number of units that each jurisdiction is required to plan for in its Housing Element.

**Table 1: Regional Housing Need Allocation by Jurisdiction and Income Level**

	Very		Above		
	Low	Low	Moderate	Moderate	Total
<b>South County</b>	1,356	964	1,118	2,305	5,743
<b>Carpinteria</b>	39	26	34	64	163
<b>Santa Barbara</b>	962	701	820	1,617	4,099
<b>Unincorporated</b>	120	80	90	210	501
<b>Goleta</b>	235	157	174	413	979
<b>Santa Ynez Valley</b>	110	73	73	202	457
<b>Solvang</b>	42	28	30	75	175
<b>Buellton</b>	66	44	41	124	275
<b>Unincorporated</b>	2	1	1	3	7
<b>Lompoc Valley</b>	138	92	101	244	575
<b>Lompoc</b>	126	84	95	221	525
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<b>Santa Maria Valley</b>	1,021	681	758	1,795	4,255
<b>Santa Maria</b>	985	656	730	1,731	4,102
<b>Guadalupe</b>	12	8	13	16	50
<b>Unincorporated</b>	25	16	14	47	103
<b>Unincorporated Total</b>	159	106	112	284	661
<b>County Total</b>	2,625	1,810	2,049	4,545	11,030

## INTRODUCTION

The preparation of a Regional Housing Needs Allocation (RHNA) Plan for the Santa Barbara County region is a responsibility assigned to SBCAG by State Housing Element law.<sup>1</sup> The RHNA process is undertaken prior to each Housing Element cycle. This RHNA Plan addresses the fifth housing element cycle, which covers an 8.75-year RHNA projection period (January 1, 2014 to September 30, 2022) and an eight-year planning period (February 15, 2015 to February 15, 2023).<sup>2</sup>

The RHNA process for the Santa Barbara County region was initiated in late 2011 and was completed in the summer of 2013, with the adoption of the RHNA Plan by the SBCAG Board. The RHNA Plan describes the methodology developed to allocate the region’s housing needs in four income categories (very low, low, moderate, and above moderate) to the eight incorporated cities and the unincorporated areas of the County of Santa Barbara in accordance with the objectives and factors contained in State law.

Recent legislation, Senate Bill 375 (SB 375) (Steinberg, 2008) and Senate Bill 575 (Steinberg, 2009), affects the RHNA process and this fifth Housing Element cycle in several ways. The main changes in this cycle include the integration of the RHNA process with the Regional Transportation Plan (RTP) and the Sustainable Communities Strategy (SCS), required coordination/consistency with the RTP and SCS per SB 375, and the length of the housing element cycle. The fifth cycle for the Santa Barbara County region covers an eight-year planning period (February 15, 2015 – February 15, 2023) in order to synchronize the housing

<sup>1</sup> See Gov. Code § 65584.05.

<sup>2</sup> The projection period is the time period for which HCD calculates the regional housing need, while the planning period is the time between the due dates for successive local government Housing Element updates. See Gov. Code § 65588(f).

needs allocation process with the four-year RTP-SCS cycle. Previously, Housing Element updates were on a five-year cycle.

The RHNA Plan, required for all regions, is intended to address statewide population growth and the housing needs of all economic segments of the community. The RHNA produces regional, sub-regional and local targets for the amount and type of housing needed over the 8.75-year projection period, January 1, 2014 – September 30, 2022. It takes into account unmet housing needs and anticipated housing demand generated by employment and population growth. The RHNA is part of a statewide mandate to address housing issues that are related to future growth in the state, including employment patterns, commuting, and housing market changes. The RHNA quantifies existing housing problems, such as jobs housing balance and affordability and assigns a share of the region's housing need to each jurisdiction.

A major function of the RHNA is to assure a fair distribution of housing among cities and unincorporated County sub-regions, so that the quantity and mix of newly built housing is affordable to low and moderate income households and is equitably shared and located in proximity to jobs. The housing targets are intended to assure that adequate sites and zoning exist to address anticipated housing demand during the planning period. The targets also help to ensure that market forces are not inhibited in addressing the housing needs of all economic segments of a community. Breaking down development barriers, such as the unavailability of land at higher densities, is a major goal of State housing law.

The regional housing allocations in this RHNA Plan are used by local jurisdictions when updating their Housing Elements. They are the basis for assuring that adequate sites and zoning are available to accommodate at least the number of units allocated. They are not housing unit production quotas that jurisdictions must achieve within the timeframe of their next Housing Element update. One of the few tools available to local jurisdictions to influence the development of affordable housing is the power to regulate land use. Removing governmental barriers to development, such as exclusively low-density zoning and growth controls, are the major goals of State housing law. Under State housing law, existing zoning ordinances, policies, building standards and other land use regulations cannot be used by local jurisdictions as a justification for a request to reduce their RHNA housing targets, except for the preservation and protection of public health and safety (Gov. C § 65584.04(f)).

## **PROCESS AND SCHEDULE**

At its May 17, 2012 meeting, the SBCAG Board accepted the final allocation of 11,030 units from HCD and directed staff to initiate the task of allocating the County-wide need to local jurisdictions pursuant to State housing law. The SBCAG Board directed that staff work with the Technical Planning Advisory Committee (TPAC) in developing a RHNA methodology and plan. Table 2 provides an outline of the RHNA schedule and the steps involved in the development of the RHNA Plan.

TPAC held six public meetings on May 3, June 5, July 24, August 8 and 14<sup>th</sup>, and September 6 to solicit input on the RHNA factors and discuss the allocation methodology. The process used by SBCAG involved the TPAC, composed of local planning staff representatives, playing a significant role. TPAC meetings were held during this process more frequently than the regular TPAC monthly meeting schedule to provide additional opportunities for input. TPAC reviewed local allocation factors, examples of other allocation methodologies of other Councils of Governments in California, and suggested and debated numerous allocation options.

Following TPAC’s recommendation, the SBCAG Board considered and adopted a draft allocation methodology in September 2012. Time was allowed for a 60-day public review period for the draft methodology and HCD review. In December 2012, the SBCAG Board adopted the final RHNA methodology and staff issued the proposed allocation. During the following 60-day period, no requests for revisions were received from local jurisdictions.

The adoption date of the SBCAG RTP-SCS establishes the Housing Element due date 18 months later.<sup>3</sup> Assuming August 15, 2013 adoption of the RTP-SCS, local Housing Elements would be due February 15, 2015. With SB 375, the Housing Element planning period has been extended from 5-years to 8-years and would run from February 15, 2015 to February 15, 2023 with adoption of the RTP-SCS in August 2013.

**Table 2: RHNA Development Schedule Summary**

<b>Date</b>	<b>Event</b>
January 2012	HCD provides a draft County-wide allocation to SBCAG
April 2012	Final SBCAG regional housing need determination by HCD
May 2012	SBCAG Board acceptance of HCD regional housing need determination
May – September 2012	Development of RHNA allocation methodology by TPAC over six public meetings
September 20, 2012	SBCAG Board adoption of draft allocation methodology
October 3, 2012	Issuance of proposed RHNA methodology and 60-day public comment period
December 20, 2012	SBCAG public comment hearing and adoption of RHNA methodology
December 21, 2012	Issuance of proposed RHNA allocation
December 22, 2012 – February 20, 2012	60-day request for revisions period
April 26, 2013	Publication of draft Regional Transportation Plan-Sustainable Communities Strategy (RTP-SCS)
May 31, 2013	Issuance of proposed final RHNA Plan, consistent with RTP-SCS
August 15, 2013	SBCAG Board adoption of RHNA Plan and Resolution
August 2013	Submission of RHNA Plan to HCD for up to 60-day review
February 15, 2015	Local Housing Element Due Date (18 months from 8/15/13 RTP-SCS adoption)

## **GEOGRAPHY**

The local jurisdictions addressed in the RHNA process for the Santa Barbara County region include the eight incorporated cities (Buellton, Carpinteria, Goleta, Guadalupe, Lompoc, Santa Barbara, Santa Maria, and Solvang) and the unincorporated areas of the County. Vandenberg

<sup>3</sup> Gov. Code § 65588(e)(2).

Air Force Base, UCSB, and the Chumash Reservation are not allocated any regional housing need since they are located on State or federal lands and considered exempt entities not part of the RHNA process.

For purposes of the RHNA methodology, the County is divided into two sub-regions, referred to as the South Coast and North County Housing Market Areas, and further divided into the incorporated cities and unincorporated areas contained within these two sub-regions. The areas are listed as follows:

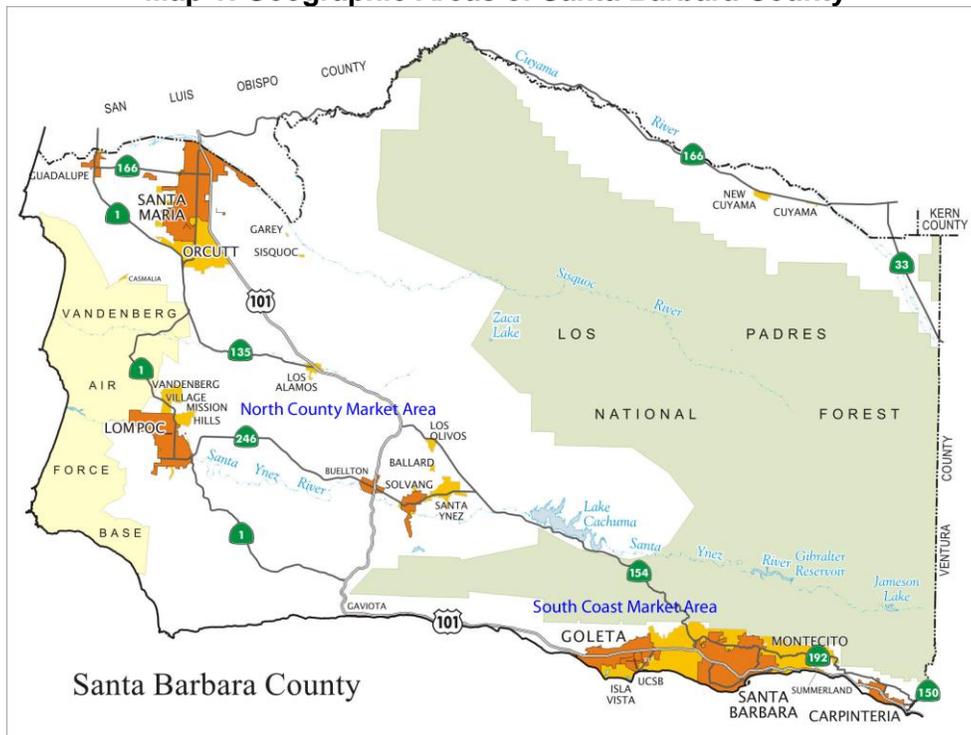
**South Coast Housing Market Area**

- Cities of Carpinteria, Santa Barbara, and Goleta
- Unincorporated Carpinteria, Montecito, Summerland, Toro Canyon, Mission Canyon, Eastern Goleta Valley, Isla Vista, Hope Ranch UCSB and Gaviota

**North County Housing Market Area**

- Cities of Santa Maria, Guadalupe, Lompoc, Solvang, and Buellton
- Unincorporated Orcutt, Guadalupe, Cuyama Valley, Lompoc Valley, and Santa Ynez Valley

**Map 1: Geographic Areas of Santa Barbara County**



**PUBLIC PARTICIPATION**

SBCAG is required as part of the RHNA process to establish a methodology for allocation of the County-wide housing need, as estimated by the State Department of Housing and Community Development (HCD), to local jurisdictions. Government Code Section 65584.04(c) stipulates that this methodology should consider input not only from local jurisdictions and the Council of Governments, but also from the public. The RHNA methodology was developed through noticed, public meetings that included the participation of the Technical Planning Advisory

Committee (TPAC) at five separate meetings over a period of four months in 2012 (June 7, July 24, August 2, August 14, and September 6), including two, two-hour special meetings. In addition to other, regular public noticing procedures, email notices were provided to SBCAG's interested parties list.

During its deliberations, TPAC directed staff to prepare a number of alternative allocation methodologies and scenarios. In the end, over fifteen different allocation methodologies were considered. Many of these methodologies focused on the relationship between jobs and housing and on the criteria of existing housing and jobs as well as projections of housing and job growth contained in the Regional Growth Forecast.

TPAC meeting minutes can be found at the following SBCAG website link:

<http://www.sbcag.org/adcm meetings2012.html>

At its September 6, 2012 meeting, by unanimous vote, the TPAC acted to recommend the proposed, two-step RHNA methodology to the SBCAG Board. Following the TPAC recommendation, the SBCAG Board directed staff to issue the proposed methodology to SBCAG member jurisdictions at a public hearing on September 20, 2012. Following a 60-day review period, at a public hearing on December 20, 2012, the SBCAG Board adopted the proposed 2014-2022 RHNA methodology and directed staff to issue the draft RHNA allocation to SBCAG member agencies.

### **COUNTY-WIDE ESTIMATE OF REGIONAL HOUSING NEED**

The HCD is responsible for assigning regions around the state with a share of the estimated statewide housing need. On April 11, 2012, State HCD provided SBCAG with a revised preliminary RHNA estimate, including breakdown by income level, of **11,030** units. Annualized over the 8.75-year projection period, this estimate equates to **1,261** units/year, down from the prior RHNA cycle of **1,480** units/year. Appendix E includes a comparison of housing allocations in prior RHNA cycles. On April 27, 2012, HCD sent SBCAG staff the final RHNA determination letter conforming to the April 11th estimate.

The SBCAG County-wide 2012 Regional Growth Forecast, then under development, was used as the basis for the discussions with HCD. The adopted 2012 Regional Growth Forecast (2012 RGF) can be found at the following SBCAG website link:

<http://www.sbcag.org/publications>

The 2012 RGF was also the subject of extensive review by the SBCAG TPAC. The employment, demographic, and housing, information in the report provided a foundation for the discussions with HCD about the reasonableness of the County-wide housing need and served in the later development of various housing allocation scenarios.

Looking closely at the HCD assumptions and calculations, the final RHNA was subject to adjustments to the rate at which new households are formed (HCD averaged the 2005-2009 and 2006-2010 American Community Survey household formation rates), adjusted group quarters (dormitories) population at UCSB, and adjusted Department of Finance population distribution by age and ethnicity to include a higher proportion of older age categories. The HCD analysis and inputs are considered a reasonable application of the methodology and assumptions prescribed by State housing law.

HCD estimated and allocated the region’s share of statewide need to Santa Barbara County using four major factors.

1. The 2014 to 2022 household growth (10,740 units). The HCD household growth is based on the State Department of Finance population forecasts, to which HCD applies a household formation rate to estimate households.
2. Vacant owner and renter units allowing for improved residential choice (367 units). The vacancy allowance was determined by HCD by applying a 2.0% vacancy rate to owner-occupied and a 5.0% vacancy rate to renter-occupied housing units.
3. Units potentially needed to replace housing units lost due to conversion, demolition, or natural disaster (57 units). HCD uses an average housing unit loss rate of 0.05% annually based on DOF demolition permit data, which predict an average of 57 permits among jurisdictions over the 2014-2022 period.
4. Adjustment for absorption of existing excess vacant units (-130 units). For this cycle only, due to the economic uncertainty and high vacancy rates, an adjustment is allowed to account for these unusual conditions.

In summary, HCD established the County-wide housing need estimate of 11,030 housing units over the projection period from 2014 to 2022. The total of 11,030 units is the minimum allocation of projected housing need for which the SBCAG region must plan. Table 3 summarizes the HCD components of County-wide need.

**Table 3: HCD Determination of SBCAG Regional Housing Need**

<b>Housing Need Components</b>	<b>HCD Estimate</b>
Forecast household growth from January, 2014 to September, 2022	10,740
Additional units to improve housing vacancy rate	367
Additional units to avert loss through demolition of housing	57
Adjustment for existing high vacancy rate	-130
<b>Total</b>	<b>11,030</b>

In addition, HCD allocated County-wide housing need by household income group based on the Census American Community Survey income data. American Community Survey data is the only comprehensive source of information on income available. The median household income for Santa Barbara County is \$60,078 dollars. Each jurisdiction is required to plan in their housing elements for its specific proportion of need by the income groups noted below. The HCD County-wide allocation by income group is shown in Table 4.

**Table 4: HCD County-wide Determination of Households by Income Level**

<b>Income Category</b>	<b>% Distribution</b>	<b>Housing Units</b>
Very Low (0-50% of median income)	23.8%	2,625
Low (50-80% of median income)	16.4%	1,810
Moderate (80-120% of median income)	18.5%	2,040
Above Moderate (120%+ of median income)	41.3%	4,555
<b>Total</b>	<b>100.0%</b>	<b>11,030</b>

## METHOD OF ALLOCATING REGIONAL HOUSING NEEDS TO LOCAL JURISDICTIONS

The RHNA methodology recommended by TPAC and adopted by the SBCAG Board allocates regional housing need to local jurisdictions in two steps: first, housing need is allocated to the housing market area level using three factors: existing jobs, job growth and housing growth (respectively weighted 80%, 10%, and 10%). In the second step, housing market area allocations are then allocated to the individual jurisdictions using available residential zoning capacity.

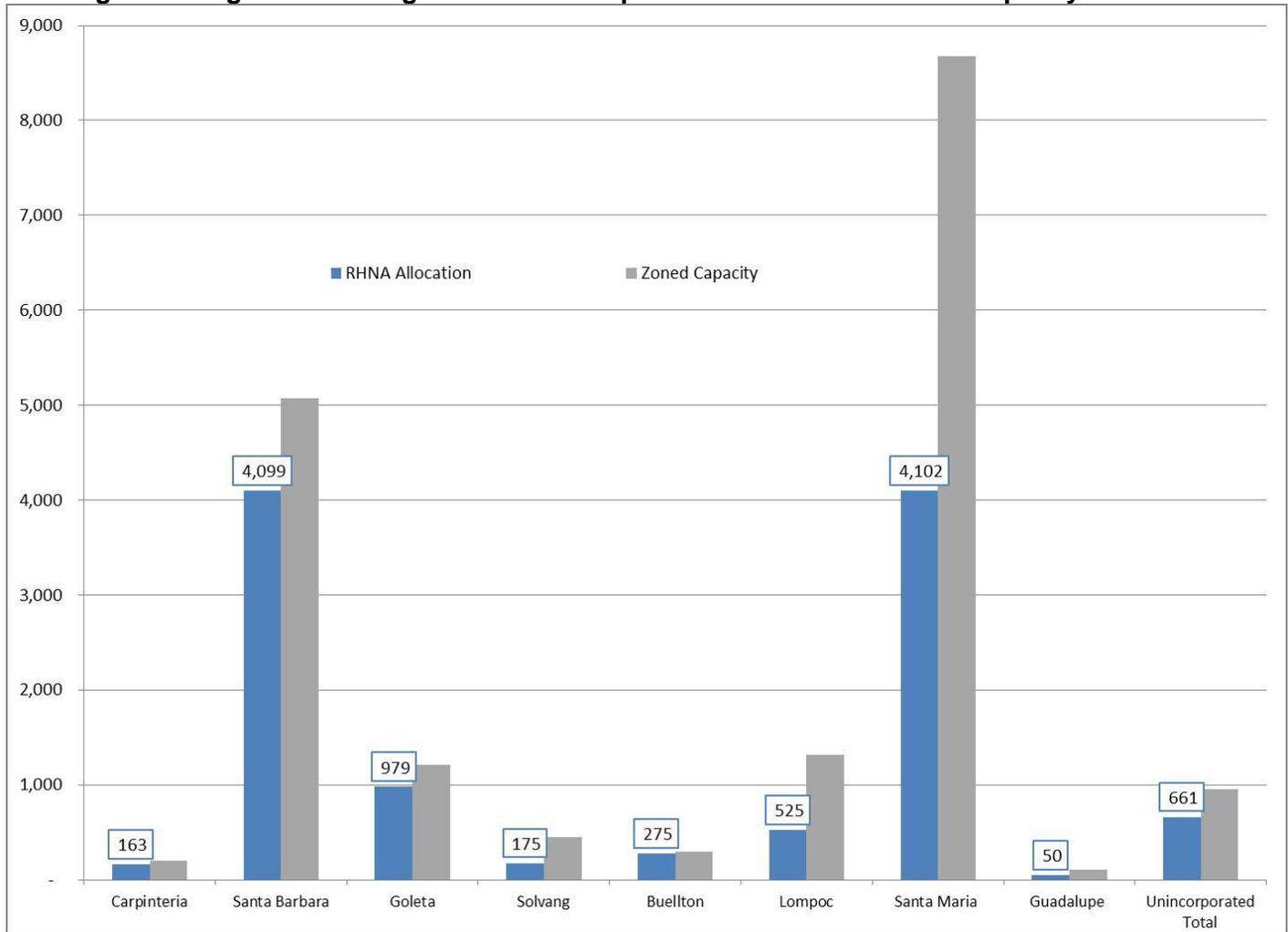
Table 5 provides the input factors consisting of existing 2010 jobs, 2014-2022 job and household growth and zoning capacity. By heavily weighting existing jobs, the RHNA methodology focuses on the existing jobs/housing imbalance and emphasizes an allocation to the South Coast region. Lesser weightings for job and housing growth acknowledge that only modest growth is anticipated through this housing cycle.

**Table 5: Inputs to the Regional Housing Needs Allocation**

		<b>Jobs</b>	<b>Households</b>		<b>Jobs</b>
	<b>2010</b>	<b>2014-2022</b>	<b>2014-2022</b>	<b>Zoning</b>	<b>Housing</b>
<b>Jurisdiction</b>	<b>Jobs</b>	<b>Growth</b>	<b>Growth</b>	<b>Capacity</b>	<b>Ratio</b>
<b>South Coast</b>	113,993	6,402	244	7,108	1.43
Carpinteria City	5,896	517	74	202	1.09
Santa Barbara	60,659	1,475	128	5,074	1.60
Unincorporated	16,828	800	4	620	1.02
Goleta City	25,290	3,610	39	1,212	1.93
<b>North County</b>	73,227	18,211	2,991	11,178	1.00
Santa Ynez Valley	12,423	2,234	250	760	1.27
Solvang City	3,206	152	31	448	1.29
Buellton City	2,210	1,744	217	297	1.20
Unincorporated	7,007	338	3	15	1.28
Lompoc Valley	19,474	1,173	4	1,423	0.96
Lompoc City	10,697	837	4	1,317	0.74
Unincorporated	8,777	336	-	106	1.51
Santa Maria Valley	40,977	14,803	2,737	8,995	0.96
Santa Maria	33,944	13,534	2,608	8,673	1.20
Guadalupe	677	32	124	105	0.36
Unincorporated	6,356	1,237	5	217	0.51
Cuyama Valley	353	-	-	-	0.53
Unincorporated Total	47,783	2,711	11	958	0.97
<b>Countywide Total</b>	<b>187,220</b>	<b>24,613</b>	<b>3,235</b>	<b>18,286</b>	<b>1.22</b>

The second step of the methodology results in a RHNA allocation for all jurisdictions that is below total existing, available residential land use capacity. Figure 1 compares the jurisdiction's zoning capacity with their respective RHNA allocations.

**Figure 1: Regional Housing Allocation Compared to Residential Zoned Capacity**



The methodology also includes a modification originally proposed by the Cities of Buellton, Lompoc and Solvang that adjusts allocations between these three jurisdictions in the North County market area to address local opportunities, constraints and market demand and bring them below their respective 2008 housing allocations. This modification occurs following the Step 2 allocation based on residential land use availability and makes the following adjustments: Buellton (+135 units), Solvang (-37 units), and Lompoc (-98 units).

Since this methodology addresses relevant statutory factors at the housing market area level, the allocation by jurisdictions within the market area is secondary. As long as the overall housing need by market area is accommodated, it should not matter as much how the jurisdictions choose to allocate it among themselves within market areas. It should be noted that housing law expressly allows such swaps during the appeal process, as long as the total housing need is addressed (Gov. Code § 65584.05(g)). While the adjustment between the Cities of Buellton, Solvang and Lompoc occurred in the allocation methodology itself, rather than during the appeal process, the result is the same.

Table 6 shows results of the allocation in Steps 1 and 2 of the methodology and the final allocation in the last column reflecting the adjustments between the Cities of Buellton, Solvang and Lompoc.

**Table 6: Method of Allocating Housing Needs to Local Jurisdictions**

Jurisdiction	Step 1				Step 2		Final Allocation
	Existing Jobs 80%	Job Growth 10%	Household Growth 10%	Total	By Land Use Capacity	Adjustment	
<b>South County</b>	5,373	287	84	5,744			
Carpinteria					163		163
Santa Barbara					4,099		4,099
Goleta					979		979
Unincorporated					501		501
<b>North County</b>	3,451	815	1,020	5,286			
Solvang					212	-37	175
Buellton					140	135	275
Lompoc					623	-98	525
Santa Maria					4,102		4,102
Guadalupe					50		50
Unincorporated					161		161
<b>Total County</b>	<b>8,824</b>	<b>1,102</b>	<b>1,104</b>	<b>11,030</b>	<b>11,030</b>		<b>11,030</b>

**ALLOCATION OF HOUSING NEED BY INCOME LEVEL**

Following allocation of total housing need to each jurisdiction, the next step in the RHNA process is to allocate housing need by household income level. The household income categories for each jurisdiction are based on the 5-year 2007-2011 Census American Community Survey distributions. These income distributions are the basis for comparison and indicate which jurisdictions have a higher proportion of very low and low income households relative to the County-wide average. Jurisdictions that have higher than average concentrations of very-low and low-income residents are assigned fewer low income housing units. Conversely, areas with lower than average concentrations of very low and low income households are assigned more low and very low income housing units. This step is done in an effort to move all jurisdictions closer to the region-wide average income distribution. The

method is the same as the one applied in the prior 2002 and 2008 RHNA Plans. The TPAC unanimously approved a recommendation to use this income distribution formula.

The four income category definitions used in the RHNA process are based on definitions established by the U.S. Department of Housing and Urban Development (HUD) and the State of California for use in their assisted housing programs. Income limits are adjusted for household and family size so that larger families have higher income limits.

The median household income for Santa Barbara County is \$60,078 dollars. The income categories are defined as follows:

- Very low income – up to 50 percent of the area median income (\$30,039).
- Low income – between the very low income limit and 80 percent of the area median income (\$30,039-\$48,062).
- Moderate income – between the lower income limit and 120 percent of the area median income (\$48,062-\$72,093).
- Above moderate-income – exceeding the moderate income limit (+\$72,093).

An application of the method to redistribute housing need by income level is provided in Table 7. A jurisdiction’s income levels are adjusted to equal the County-wide average of very low and low proportions. For example, for a jurisdiction that has 41% very low income households as a proportion of total households, the jurisdiction’s percentage compared to the County-wide average score of 24%. The resulting adjustment for the jurisdiction is –17%, so that its adjusted share of very low income need is lowered from 41% to the County-wide average of 24%. Conversely, a jurisdiction with a relatively low proportion (e.g., 12%) of very low income households is adjusted upward (in this case, 24%) to equal the County-wide average.

**Table 7: Example Redistribution of Households by Income Level**

<b>Income Group Categories</b>	<b>County-wide Income Distribution</b>	<b>Jurisdiction with High % of Low Income</b>	<b>Regional Share Re-Distribution</b>	<b>Jurisdiction with Low % of Low Income</b>	<b>Regional Share Re-Distribution</b>
Very Low	24%	41%	24%	12%	24%
Low	17%	25%	17%	15%	17%
Moderate	19%	18%	16%	19%	12%
Above Moderate	40%	16%	43%	54%	47%
Total	100%	100%	100%	100%	100%

The RHNA income level adjustment factors are applied to each jurisdiction, including the cities and unincorporated County. Table 8 provides the distribution of housing need by income group when the methodology described above is applied to each jurisdiction.

**Table 8: Regional Housing Need Allocation by Jurisdiction and Income Level**

	Very			Above	
	Low	Low	Moderate	Moderate	Total
<b>South County</b>	1,356	964	1,118	2,305	5,743
<b>Carpinteria</b>	39	26	34	64	163
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<b>Unincorporated Total</b>	159	106	112	284	661
<b>County Total</b>	2,625	1,810	2,049	4,545	11,030

### CONSISTENCY WITH STATUTORY OBJECTIVES

As discussed below, the proposed RHNA methodology is consistent with all of the four statutory objectives required by law:<sup>4</sup>

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

The RHNA methodology allocates housing need in all four income categories to each of the region's jurisdictions based on existing concentrations of low and very low income households, thus addressing the objective of promoting socioeconomic equity. According to the proposed method for distribution of units by income level (which is the same method used in both 2003 and 2008), areas that have higher than average concentrations of low and very low income households are assigned more, higher income moderate and above moderate households. Conversely, areas with higher concentrations of higher income households are assigned

<sup>4</sup> See Gov. Code § 65584(d)

proportionally more low and very low income households. The purpose of this method is to try to address this statutory objective by moderating the discrepancies among jurisdictions regarding existing low and very low income households.

- (2) *Promoting infill development and socioeconomic equity, the protection of environmental and agricultural resources, and the encouragement of efficient development patterns.*

The RHNA methodology utilizes the forecasted pattern of development from the 2040 Regional Growth Forecast and land use model, which incorporates policies in local plans that call for higher density housing to be concentrated in urbanized areas adjacent to transit and that protect environmental and agricultural resources. The development pattern demonstrates that the region's local land use plans have increased the region's multi-family housing capacity and ability to accommodate the housing needs of all income levels during the next housing element cycle. In addition, the RHNA methodology results in an allocation of housing need that is consistent with the Sustainable Communities Strategy developed as part of the Regional Transportation Plan update. The Sustainable Communities Strategy focuses on infill development, efficient development patterns and protection of environmental and agricultural resources, as well as socioeconomic equity, consistent with this statutory objective.

- (3) *Promoting an improved intraregional relationship between jobs and housing.*

The RHNA methodology promotes an intraregional relationship between jobs and housing because the methodology distributes the housing need based on existing employment, population growth and employment growth at a market area level. In doing so, it recognizes and directly seeks to address the present jobs-housing imbalance in the SBCAG region. As discussed above, the RHNA methodology's allocation of housing need is consistent with the Sustainable Communities Strategy, which also strives to address the regional jobs-housing relationship.

- (4) *Allocating a lower proportion of housing need to an income category when a jurisdiction already has a disproportionately high share of households in that income category, as compared to the County-wide distribution of households in that category from the most recent decennial United States census.*

The RHNA methodology moves toward improving the current distribution of lower income households in the region by adjusting each jurisdiction's proportion of such households towards the County-wide average. In this manner, it expressly addresses and conforms to this objective.

## **CONSIDERATION OF STATUTORY FACTORS**

State housing law also requires that SBCAG consider a number of factors in development of the RHNA allocation methodology as listed in Government Code Section 65584.04(d). As discussed below, SBCAG has addressed these factors in the development of the proposed methodology.

- *Jobs/housing relationship;*

This factor has been studied extensively and was examined in both the 2007 Regional Growth Forecast and a prior SBCAG study: Interregional Partnership for Jobs, Housing, and Mobility (adopted in July 2004). The relationship between jobs and housing has been directly integrated into the allocation methodology by using existing jobs, job growth and household growth as the factors for allocating housing need. Existing jobs are weighted heavily (80%) so that housing need is allocated to those regions that have the most jobs now. Job and household growth are also integrated, but weighted less heavily, recognizing the limited amount of growth anticipated between now and the end of the housing planning period. These factors are applied at the housing market level, recognizing and addressing the current jobs-housing imbalance between the North County and South Coast housing markets.

- *Opportunities and constraints to developing housing;*

The second step of the proposed methodology relies on existing residential land use capacity to allocate housing need from the housing market area level to the jurisdiction level. Existing residential land use capacity, as shown in local general plans and housing elements, reflects opportunities and constraints to housing development at the local level. The proposed methodology also makes special adjustments between the three cities of Lompoc, Buellton and Solvang based on local market factors.

While existing zoning can be considered as a factor, it is important to note that there are limits to which such constraints can be used. Government Code Section 65584.04(d)(2)(B) states, "The council of governments may not limit its consideration of suitable housing sites or land suitable for urban development to existing zoning ordinances and land use restrictions of a locality, but shall consider the potential for residential development under alternative zoning ordinances and land use restrictions." Also, California Attorney General Opinion 87-206 suggests that the availability of suitable sites can also be based on the potential for increased residential development under alternative zoning and land use restrictions. The SCS, with which the RHNA allocation is consistent, considers residential development potential under alternative zoning.

- *The distribution of household growth assumed for purposes of a comparable period of regional transportation plans and opportunities to maximize the use of public transportation and existing transportation infrastructure;*

In considering the role that public transportation and existing transportation infrastructure have in the allocation methodology, advisory committee members discussed two issues: the need to place more housing near jobs to shorten commute distances and to consider higher density residential opportunities along major bus routes or near transit stations and transfer points. The complex dynamics and interrelationship between jobs and housing are studied in depth as part of the current RTP-SCS. This plan in particular explores transit-oriented development and infill opportunities. The proposed RHNA methodology achieves an allocation of housing need consistent with the RTP-SCS plan, assuring that this factor is addressed.

- *Market demand for housing;*

Anticipated employment and population growth are major determinants of housing need in the region. These factors, together with demographic measures that predict household formation, help estimate future market demand and are considered as factors in the proposed RHNA methodology. Consideration of job and population growth is accomplished primarily through the

growth forecast process, which measures demographic and economic trends that create new jobs and population, and consequently housing need. The SBCAG Regional Growth Forecast uses an employment-based forecast and land use model to determine growth over the RHNA time period and beyond out to 2040.

- *Agreements between county and cities to direct growth toward incorporated areas;*

The local governments participating in the RHNA methodology development process have identified no specific agreements that have a direct impact on the RHNA allocation. As required by law (see Gov. Code § 65584.04(b)(1)), SBCAG surveyed each of the member jurisdictions in May 2012 to request information regarding the statutory factors, including this one.

- *The 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.*

The RHNA determination should also take into consideration the loss of housing units in assisted developments that convert to non-low-income use due to subsidy expiration or termination of use restrictions, etc. Assisted developments include multi-family rental households that receive government assistance under an array of federal, State, and local programs. A County-wide inventory of these units shows a minimal number of units at risk. Because this factor is not significant either regionally or locally, it was not given explicit weighting in the proposed allocation methodology formula.

- *High housing cost burdens;*

There was general agreement among member agency representatives on the TPAC that housing costs for both rental and for sale housing is high, in particular throughout the South Coast. High housing costs are a result of supply and demand, which in turn is driven to a large extent by the existing jobs-housing imbalance as workers bid up housing located near their jobs. Therefore, by weighting existing jobs heavily as an allocation factor, the proposed methodology also indirectly addresses and considers high housing costs.

- *The housing needs of farmworkers;*

Existing jobs data used in applying the proposed methodology counts existing agricultural employment. Also, the SBCAG Regional Growth Forecast provides an assessment of farmworker housing need by quantifying the future number and location of workers in the agricultural sector. By using both existing jobs and job growth as explicit allocation factors, the proposed methodology considers the housing needs of both current and future farmworkers.

- *The housing needs generated by the presence of a private university or a campus of the California State University or the University of California within any member jurisdiction;*

The housing needs generated by private colleges and State institutions of higher learning were considered in the development of the proposed methodology. Significantly, the current and future housing needs of the University of California, Santa Barbara were thoroughly considered, including needs generated by UCSB's 2025 Long Range Development Plan (LRDP). The

updated Regional Growth Forecast includes population and job growth at UCSB, which is incorporated into the methodology through explicit consideration of population and job growth as factors. However, housing needs generated by UCSB are a function both of student population and faculty and staff employment and of housing provided by or planned to be provided in the future by UCSB itself. Insofar as it plans for on-campus housing for students, faculty and staff in its LRDP, UCSB is very similar to any other jurisdiction that plans for anticipated housing need. There was general agreement among TPAC members that planned housing at UCSB which will be realized within the eight-year RHNA period offsets local housing need and must be taken into account. SBCAG staff has raised the question of how to account for planned UCSB housing in the RHNA process with State HCD staff and has suggested that, consistent with other regions and jurisdictions similarly situated, such housing should be credited to the South Coast jurisdictions most significantly impacted by UCSB housing needs.

- *Any other factors adopted by the council of governments;*

As required by Government Code Section 65584.04(b)(1-4), SBCAG surveyed the member agencies through their planning and community development departments for data and factors that should be included in the RHNA methodology. Factors considered in the methodology represent the input from member agencies as well as the feasibility of obtaining the data and disaggregating it to the appropriate geographic level of analysis.

### **REDISTRIBUTION OF REGIONAL HOUSING NEEDS UPON ANNEXATION OR INCORPORATION**

In the event of annexation or incorporation of new jurisdictions involving land with potential for residential development during the planning period of this RHNA Plan, provision needs to be made for the potential redistribution of housing needs (Gov. Code § 65584.07).

The following process applies to any such redistribution:

1. Filing of Application for Annexation or Incorporation  
Upon receipt of notice of filing from LAFCO of a proposed annexation or incorporation, the affected jurisdictions will notify SBCAG of the proposal and resulting need for a redistribution of housing needs between the County and applicant jurisdiction.
2. Discussion with Annexing/Incorporating City  
Each of the two participating jurisdictions (city and County) will negotiate in good faith with a goal to achieve an equitable transfer of that portion of the County's RHNA projected to be met in the annexation area to the annexing jurisdiction by income level.

The redistribution of RHNA will be based on the requirements of the Government Code Section 65584.07. The total number of housing units by income category accepted by the applicant jurisdiction, plus the remaining number of units by income category attributable to the donor jurisdiction, shall not be less than the original number of units by income category originally allocated to both jurisdictions by the RHNA Plan.

In accordance with the provisions of Government Code Section 65584.07(c)(1), the city and County may make a mutually acceptable agreement concerning a revised determination. They may simply report this agreement and its terms in writing to SBCAG. However, if the affected parties cannot reach a mutually acceptable agreement, then either party may request SBCAG to make a revised determination, in a timely manner, based on facts, data and methodology submitted by both parties.

3. Annexation/Incorporation Conditions

The affected jurisdictions should jointly draft conditions covering the transfer of RHNA allocations. The affected jurisdictions should request that the RHNA conditions be included in the LAFCO resolution approving the annexation/incorporation.

4. LAFCO Consideration of Conditions

LAFCO will consider the proposed RHNA conditions in the resolution approving the annexation/incorporation.

HCD must be notified of all transfers. Jurisdictions affected by RHNA transfers must amend their Housing Elements to reflect the transfer within a specified timeframe (180 days).

**Appendix A**  
**HCD Regional Housing Needs Determination Letter**

STATE OF CALIFORNIA - BUSINESS, TRANSPORTATION AND HOUSING AGENCY

EDMUND G. BROWN JR., Governor

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

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[www.hcd.ca.gov](http://www.hcd.ca.gov)



April 27, 2012

Mr. Jim Kemp  
Executive Director  
Santa Barbara County Association of Governments  
260 North San Antonio Road  
Santa Barbara, CA 93110

Dear Mr. Kemp:

**RE: Regional Housing Need Determination for Housing Element Updates**

This letter provides the Santa Barbara County Association of Governments (SBCAG) its fifth cycle regional housing need assessment (RHNA) determination for the projection period January 1, 2014 through September 30, 2022. The Department of Housing and Community Development (Department), is required to determine SBCAG's existing and projected housing need pursuant to State housing law (Government Code Section 65584, et. seq.).

As you know, Senate Bill 375 (Chapter 728, Statutes of 2008) further strengthened the existing coordination of housing and transportation planning by requiring Metropolitan Planning Organizations (MPO) to develop and incorporate a new sustainable community strategy (SCS) in the Regional Transportation Plan (RTP) to achieve greenhouse gas emission reductions and ensure the SCS accommodates the RHNA. SB 375 also amended the RHNA schedule and methodology and, among other things, strengthened rezoning requirements.

Since only partial demographic data was available from Census 2010 and the Department of Finance (DOF), the Department's RHNA determination also utilized American Community Survey (ACS) data. In assessing SBCAG's regional housing need, the Department considered the critical role housing plays in developing sustainable communities and supporting employment growth. The Department determined SBCAG's regional housing need to be 11,030 units for the 8.75-year projection period from January 1, 2014 through September 30, 2022. This RHNA reflects the Department's consideration of SBCAG's strong socio-economic base and potential for recent household formation trends to generate housing demand at a changing and more diverse pace.

In determining the regional housing need, consideration was also given to the extraordinary uncertainty regarding national, State, local economies and housing markets. As a result, for this RHNA cycle only, the Department made an adjustment to account for abnormal vacancies and unique market conditions due to prolonged recessionary conditions, high unemployment, and unprecedented foreclosures.

Mr. Jim Kemp  
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In assessing SBCAG's regional housing needs, the Department and representatives of SBCAG completed the consultation process specified in statute through correspondence, meetings and conference calls conducted between November 2011 and April 2012. SBCAG participants included Mr. Peter Imhof, Deputy Director of Planning Division, Mr. Brian Bresolin, Regional Analyst and Mr. Stephen Levy, Director and Senior Economist of the Center for Continuing Study of the California Economy. The Department also consulted with Ms. Mary Heim, demographic expert, and the DOF's Demographic Research Unit.

In finalizing SBCAG's RHNA, the Department applied methodology and assumptions regarding the following factors (Government Code Section 65584.01(c)(1)):

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

Data, assumptions, and draft forecasts of population, employment and housing, as well as information about the relationship between jobs and housing provided by SBCAG in regards to the above factors were considered. Assumptions made about the rate with which existing vacant "for sale" and "for rent" housing units may be absorbed for occupancy by the beginning of the projection period in 2014 were also considered.

The Attachments to this letter describe details of the Department's methodology and RHNA income category distribution for SBCAG to allocate 11,030 housing units among all its local governments. As you know, SBCAG must provide each locality a RHNA share of very-low, low-, and moderate-income units that at least equals the total for each of these income categories shown in Attachment 1 and also distribute housing need for above-moderate income households. The RHNA represents the *minimum* amount of residential development capacity a jurisdiction must plan to accommodate through zoning and appropriate development strategies. RHNA is not to be used within local general plans as a maximum amount or cap of residential development to plan for or approve.

SBCAG's RHNA projection period (also described in the attachments) was determined pursuant to Government Code Section 65588(e)(6), to coordinate housing and transportation planning based on SBCAG's *estimated* RTP adoption date in March of 2013. For calculation purposes the estimated date was considered to be March 30, 2013. Please note that if the actual RTP adoption date differs from the estimated date, it could change the housing element due date, and implicitly the housing element planning period. However, such changes would not impact RHNA as there is no statutory provision to amend the housing need projection period and the Department's final RHNA Determination.

The housing element due date schedule is updated periodically and made available on the Department's website at: [http://www.hcd.ca.gov/hpd/hrc/plan/he/he\\_time.htm](http://www.hcd.ca.gov/hpd/hrc/plan/he/he_time.htm).

SBCAG is responsible for developing a RHNA distribution methodology and adopting a RHNA Plan for the period of January 1, 2014 through September 30, 2022. Housing element law (Government Code Section 65584, et. seq.) requires SBCAG's methodology and RHNA Plan to be consistent with the following objectives:

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

Pursuant to Government Code Section 65584.05(h), SBCAG is required to submit its RHNA Plan to the Department for approval within three days of adopting the RHNA Plan. Once the Department has approved the RHNA Plan, SBCAG is to distribute to all its local government members their income category shares of new housing needs to be addressed in their housing element updates covering 2014 - 2022.

In updating their housing elements, local governments may only take RHNA credit for units permitted since the January 1, 2014 start date of the RHNA projection period. Localities are also required to describe how units were credited to different income categories based on actual or projected sale price or rent level data.

Any city planning to accommodate a portion of RHNA on sites within a city's Sphere of Influence (SOI) needs to include an annexation program in the housing element. The annexation program needs to demonstrate SOI sites can be annexed early enough in the planning period to make adequate sites available before triggering penalties pursuant to Government Code sections 65583(c)(1)(A), and 65583(f).

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

Mr. Jim Kemp  
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The Department commends SBCAG's efforts to meet the objectives of SB 375 and appreciates the assistance provided by Mr. Brian Bresolin during the RHNA consultation process.

We look forward to a continued partnership with SBCAG and its member jurisdictions in planning efforts to accommodate the region's housing need. If you have any questions or need additional assistance, please contact me or Anda Draghici, Senior Housing Policy Specialist, at (916) 445-4728.

Sincerely,

A handwritten signature in cursive script that reads "Glen A. Campora".

Glen A. Campora  
Assistant Deputy Director

Enclosures

**ATTACHMENT 1**

**HCD REGIONAL HOUSING NEED DETERMINATION: SBCAG  
Projection Period: January 1, 2014 through September 30, 2022**

<b>Income Category</b>	<b>Percent</b>	<b>Regional Housing Need (rounded) <sup>(1)</sup></b>
Very-Low	23.8%	2,625
Low	16.4%	1,810
Moderate	18.5%	2,040
Above-Moderate	41.3%	4,555
<b>Total</b>	<b>100.0% <sup>(2)</sup></b>	<b>11,030 <sup>(3)</sup></b>

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

For this RHNA cycle only (due to unique conditions not expected to recur to impact future RHNA cycles), the housing need was adjusted downward to account for an estimated 80 percent absorption level of unprecedented high vacancies in existing stock due to extraordinary conditions including high foreclosures and economic uncertainties.

(2) The income category percentages reflect the minimum percentage to apply against the total RHNA decided by SBCAG in determining housing need for very-low, low, and moderate income households. Each category is defined by Health and Safety Code (Section 50093, et seq.). Percentages are derived from the 2006-2010 American Community Survey's number of households by income, over 12 month periods. Housing unit need under each income category is derived from multiplying the portion of households per income category against the total RHNA determination.

(3) The 11,030 allocation (see Attachment 2) reflects SBCAG's projected minimum housing need (rounded), using household formation rates from American Community Surveys (ACS) and an adjustment (-130) for existing excess vacant units in estimating 20% of vacant units will not be absorbed before 2014. This column represents the minimum housing need that SBCAG's RHNA Plan must address in total and also for very-low, low, and moderate income categories.

**ATTACHMENT 2  
HCD REGIONAL HOUSING NEED DETERMINATION: SBCAG**

<b>HCD Determined Population, Households, &amp; New Housing Need: January 1, 2014-September 30, 2022 (8.75 years)</b>				
1	<b>Population: September 30, 2022 (based on DOF Interim )</b>			448,137
2	<i>less: Group Quarters Population (Census 2010 estimate w. UCSB adjustment)</i>			20,567
3	<b>Household (HH) Population: September 30, 2022</b>			427,570
	<b>Household Formation Groups</b>	<b>HH Population</b>	<b>HH Formation or Headship Rate (ACS)</b>	<b>Households</b>
	<b>All Age Groups (DOF)</b>	427,571		156,901
	Under 15	83,612		
	15 - 24 years	69,766	14.57%	10,164
	25 - 34 years	53,228	41.62%	22,155
	35 - 44 years	40,276	49.94%	20,112
	45 - 54 years	51,394	54.01%	27,756
	55 - 64 years	55,167	55.90%	30,836
	65 -74 years	41,982	59.56%	25,005
	75 - 84 years	22,819	63.74%	14,544
	85+ years	9,326	67.87%	6,330
4	<b>Projected Households: September 30, 2022</b>			156,901
5	<i>less: Households at Beginning of Projection Period (January, 2014, interpolated)</i>			146,161
6	<b>Household Growth: 8.75 Year Projection Period</b>			10,740
7	<b>Vacancy Allowance</b>	<b>Owner</b>	<b>Renter</b>	<b>Total</b>
	Tenure Percentage per 2010 Census	52.70%	47.30%	
	HH Growth by Tenure	5,660	5,080	10,740
	Healthy Vacancy Rate	2.00%	5.00%	
	Vacancy Allowance	113	254	367
8	<b>Replacement Allowance (minimum)</b>	0.50%		11,107
				11,160
9	<i>less: Adjustment for Absorption of Existing Excess Vacant Units</i>			
	<b>Estimate 80% Absorbed, 20% Not Absorbed by 2014</b>	<b>Effective Vacant Units</b>	<b>Healthy Market Units</b>	<b>Differential</b>
	Derived (2010 Census, HH Growth, & Vacancy Rate)	(4,459)	5,102	643
	Total 2011 Housing Stock	153,214		
	Existing Vacant Unit (Others) Adjustment	1.52%	1.10%	
	Total Adjusted Existing Vacant Units (Others)	(2,330)	1,680	-650
	Estimated Units (Others) Not Absorbed by 2014	20%		-130
				-130
	<b>SBCAG REGIONAL HOUSING NEED DETERMINATION</b>			11,030

- Population:** Pursuant to Government Code Section 65584.01(b), and in consultation with SBCAG, the September 30, 2022 population projection was extrapolated based on Department of Finance (DOF) Interim Projections published in June 2011 for July 2020 and DOF's E5 estimate for January 2011.
- Group Quarter Population:** Figure is an estimate of persons residing either in a group home, institution, military, or dormitory using 2010 Census data for group quarters, adjusted with planned University of California Santa Barbara addition of dormitory beds over the projection period. As this population doesn't constitute a "household" population generating demand for a housing unit, the group quarter population is excluded from the calculation of the household population, and is not included in the housing need.
- Household (HH) Population:** The portion of population projected to reside in housing units after subtracting the group quarter population from total projected population.
- Projected 2022 Households (HHs):** The September 2022 number of households is derived by applying (to 2022 HH population) household formation rates calculated as an average between the regional 2005-2009 American Community Survey (ACS) household formation rates and the regional 2006-2010 ACS household formation rates, as provided by DOF. The use of the average is based on the assumption that in the future headship rates will be higher than they were in 2010, but will not return to the levels of the 1990s. HH formation or headship rates reflect the propensity of different population groups (age, racial and ethnic) to form households.

**ATTACHMENT 2**  
**HCD REGIONAL HOUSING NEED DETERMINATION: SBCAG**

- 5 **Households at Beginning of Projection Period:** The baseline number of households at the beginning of the projection period (January 2014) must be projected, as a direct effect of amendment to Section 65588(e)(6) specifying the new projection period to start on either June 30 or December 31 whichever date most closely precedes the end of the current housing element period (June 30, 2014 for SBCAG). As such, the 2014 household number was calculated as an interpolation between DOF's E5 2011 estimate of households and the 2022 projected number of households.
- 6 **Household (HH) Growth:** This figure reflects projected HH growth and need for new units.
- 7 **Vacancy Allowance:** An allowance (unit increase) is made to facilitate availability and mobility among owner and renter units. Owner/Renter % is based on Census 2010 data. A smaller rate is applied to owner units due to less frequent mobility than for renter households. Information from a variety of authoritative sources supports an acceptable range of 1 to 4% for owner units and 4 to 8% for renter units depending on market conditions.
- 8 **Replacement Allowance:** Rate (0.5%) reflects the housing losses that localities annually reported to DOF each January for years 2001-2010, or 0.5%, whichever is higher.
- 9 **Adjustment for Absorption of Existing Excess Vacant Units:** For this RHNA cycle only (due to extraordinary uncertainty regarding conditions impacting the economy and housing market not expected to similarly impact future RHNA cycles), a new one-time adjustment was made to account for unprecedented high vacancies in existing stock due to unusual conditions including high foreclosures and economic uncertainties. An absorption rate of 80% of existing excess vacant units is assumed to occur in shrinking current excess vacant units before the start of the 2014 RHNA projection period. This results in applying a 20% adjustment to account for units not absorbed, reflected in a downward adjustment of (- 130). Existing housing stock consists of two components: (1) housing units for sale and rent in existing housing stock that are above the housing units required to maintain the healthy market condition, calculated as the number of units in housing stock (for sale + for rent + sold, not occupied+rented, not occupied + occupied units), (2) housing units in the "vacant units others" category of existing housing stock above the simple average of 1.10% calculated based on Census data from 1990 , 2000 and 2010. The Department used 2010 Census Demographic profile data (DP-1) and desirable "normal" vacancy rates by tenure, in conjunction with the region's household growth and proposed household formation rates. The vacancy adjustment is limited to not exceed the differential between the 2010 Census vacant units and the healthy market vacant units rate associated with the region's annual household growth. As the adjustment was below the differential, the adjustment was applied in calculating the RHNA determination.

**RHNA Projection Period January 1, 2014 to September 30, 2022:** Pursuant to SB 375, the start of the *projection* period (in effect January 1, 2014) was determined pursuant to GC 65588(e)(6), which requires the new projection period to start on June 30 or December 31 that most closely precedes the end of the current housing element period, which for SBCAG region is June 30, 2014. The end of the projection period was determined pursuant to GC 65588(e)(5) to be the end of the housing element planning period.  
*Note: For projection purposes the end of the projection period is rounded to the end of the month.*

**Housing Element Planning Period September 30, 2014 to September 30, 2022:** Pursuant to SB 375, the start of the *planning* period was determined pursuant to GC 65588(e)(5), 18 months from the estimated adoption date of SBCAG's Regional Transportation Plan, as notified by SBCAG to HCD, with the date rounded to the end of month for projection purposes. The end of the planning period was calculated pursuant to GC 65588(e)(3)(A), 18 months after the adoption of the second RTP, provided that it is not later than eight years from the adoption of the previous housing element. If the actual RTP adoption date differs from the estimated date of March 30, 2013, the RHNA determination and the projection period will not change, however the housing element due date, and implicitly, the housing element planning period would change accordingly.

**Appendix B**  
**Proposed RHNA Methodology 60-Day Comment Period Transmittal Letter**



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October 3, 2012

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947 Camino Caballo  
Nipomo, CA 93444

**Re: Issuance of Proposed Regional Housing Needs Allocation Methodology,  
Santa Barbara County, and 60-day Public Comment Period**

Dear Planning Directors and Interested Parties:

At its September 20, 2012 meeting, the Santa Barbara County Association of Governments Board approved and directed staff to issue a proposed Regional Housing Needs Allocation (RHNA) methodology in compliance with Government Code Section 65584.04. This letter is to advise you formally of the proposed methodology and a 60-day comment period. The proposed methodology is attached hereto, together with relevant underlying data and assumptions. State law provides that following the 60-day

Member Agencies

Buellton • Carpinteria • Goleta • Guadalupe • Lompoc • Santa Barbara • Santa Maria • Solvang • Santa Barbara County

comment period, SBCAG must adopt a final regional housing need allocation methodology after considering comments received.

Local jurisdictions and the public have a period of 60 days to review the draft RHNA allocation methodology and submit comments to SBCAG. Gov. C. § 65584.04(h). Comments must be submitted to SBCAG no later than Friday, December 2, 2012. SBCAG intends to hold a public hearing to hear comments and adopt the draft methodology at its regularly scheduled meeting on December 20, 2012. Comments received by the deadline will be incorporated into the staff report and distributed to our Board in advance of the meeting.

Following issuance of draft RHNA allocations based on the adopted methodology, SBCAG member jurisdictions can request revisions to be heard by the SBCAG Board. Gov. C. § 65584.05(b). After hearing any such revisions, SBCAG will then issue a proposed final RHNA plan, which jurisdictions have the right to appeal. The final RHNA Plan must be adopted consistent with the draft Regional Transportation Plan-Sustainable Communities Strategy.

Each of your agencies has been an integral part of SBCAG's Technical Planning Advisory Committee (TPAC), whose assistance in developing the proposed methodology was indispensable. On behalf of our Board, I would like to thank you for your exceptional collaboration and contributions to this successful planning process.

If you have any questions regarding the proposed RHNA methodology, please do not hesitate to contact me, or Peter Imhof, Deputy Director of Planning, at (805) 961-8900.

Sincerely,



Jim Kemp  
Executive Director

cc: File (CP 11-07)  
Glen Campora, State Department of Housing and Community Development  
Rob Pierson, Executive Director, City of Santa Barbara Housing Authority  
Fredrick Lamont, Executive Director, County of Santa Barbara Housing Authority  
Jaime Valdez, City of Goleta Economic Development Coordinator, Affordable Housing Task Force

Attachments:

1. Proposed RHNA Methodology
2. Underlying Data and Assumptions
3. Consistency of Proposed Methodology with Statutory Objectives and Factors

## 1. Proposed RHNA Methodology

On April 27, SBCAG received its final determination of 11,030 units from the State Housing and Community Development Department (HCD) for the fifth cycle regional housing needs assessment (RHNA) for the projection period January 1, 2014 through September 30, 2022. This RHNA determination represents the lowest RHNA ever received for Santa Barbara County, on both an absolute and annualized basis and reflects the economic recession and slower growth rates.

The proposed RHNA methodology allocates identified regional housing need to SBCAG member jurisdictions in a two-step process. In the first step, housing need is allocated to the housing market area level (North County and the South Coast), giving weight to three statutory factors: existing jobs (80%), job growth (10%) and household growth (10%). In the second step, housing need is allocated from the market area level to the jurisdiction level based on existing, available residential land use capacity as updated by each jurisdiction. In this manner, the proposed methodology addresses important planning factors by market area and results in an allocation within the existing overall residential land use capacity of each jurisdiction.

The recommended methodology includes a modification originally proposed by the Cities of Buellton, Lompoc and Solvang that adjusts allocations between these three jurisdictions in the North County market area (Buellton, Solvang and Lompoc) to address local opportunities, constraints and market demand and bring them below their respective 2008 allocations. This modification occurs following the Step 2 allocation based on land use availability and makes the following adjustments: Buellton (+135 units), Solvang (-37 units), and Lompoc (-98 units).

By heavily weighting existing jobs, this proposed RHNA methodology focuses on the existing jobs/housing imbalance and favors an allocation to the South Coast market area. Lesser weightings for job and housing growth acknowledge that only modest growth is anticipated through this housing cycle. Housing market areas are defined for purposes of the methodology as the North County and South County.

Distribution of units by income level follows the same approach employed by SBCAG in both 2003 and 2008, which, consistent with State law, adjusts the proportion of low and very low income groups in each jurisdiction to equal the region-wide average distribution. SBCAG is required to assign the allocations to each jurisdiction according to four household income levels (very low, low, moderate and above moderate). According to this method, housing need by income group is distributed so as to adjust the proportion of low and very low income groups in each jurisdiction to equal the region-wide average distribution. For example, for a jurisdiction that has 41% very low income households as a proportion of total households, the jurisdiction's percentage is compared to the region-wide average of 24%. The resulting adjustment for the jurisdiction is -17% so that its adjusted share of very low income housing need is lowered from 41% to the region-wide average of 24%. Conversely, a jurisdiction with a relatively low proportion (e.g., 12%) of very low income households is adjusted upward (by +12% to 24%) to equal the region-wide average. This same process is then applied to the low income unit distributions. In order for all income level distributions to total 100 percent, the moderate and above moderate income distributions are adjusted to reflect changes to the very low and low categories. For example, a -17% adjustment in the very low category would require a +17% adjustment in the moderate income category.

## Appendix C Issuance of RHNA Allocation and SBCAG Board Adoption of RHNA Methodology



260 North San Antonio Road., Suite B • Santa Barbara, CA • 93110  
Phone: 805/961-8900 • Fax: 805/961-8901 • www.sbcag.org

December 21, 2012

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Larry Appel  
Community Development Director  
City of Santa Maria  
110 South Pine, #101  
Santa Maria, CA 93458-5082

Tim Ness  
City Manager  
City of Guadalupe  
918 Obispo St.  
Guadalupe, CA 93434

Re: **Issuance of Proposed Regional Housing Needs Assessment Allocation,  
Santa Barbara County**

Dear Planning Directors and Interested Parties:

At its December 20, 2012 meeting, following a 60-day comment period, the Santa Barbara County Association of Governments (SBCAG) Board formally adopted the previously issued proposed Regional Housing Needs Allocation (RHNA) methodology for the 2014 to 2022 housing cycle and directed staff to issue a draft RHNA allocation to SBCAG member jurisdictions. We previously advised you of the proposed methodology and 60-day comment period by letter dated October 3, 2012.

### Member Agencies

Buellton • Carpinteria • Goleta • Guadalupe • Lompoc • Santa Barbara • Santa Maria • Solvang • Santa Barbara County

In compliance with Government Code Section 65584.05(a), this letter distributes the draft allocation of regional housing need based on the allocation methodology adopted by the SBCAG Board, together with the underlying data and methodology upon which it is based. The proposed allocations for all jurisdictions are attached hereto. As provided by Government Code Section 65584.05(b), local jurisdictions have 60 days in which to request revisions to their allocations. After hearing any such revisions, SBCAG will then issue a proposed final RHNA plan, which jurisdictions have the right to appeal. The final RHNA Plan must be adopted consistent with the draft Regional Transportation Plan-Sustainable Communities Strategy.

If you have any questions regarding your jurisdiction's draft RHNA allocation, please contact Peter Imhof, Deputy Director of Planning, at (805) 961-8900.

Sincerely,



Jim Kemp  
Executive Director

cc: File (CP 11-07-01)  
Peter Imhof, Deputy Director  
Brian Bresolin, Regional Analyst  
Glen Campora, State Department of Housing and Community Development  
Rob Pearson, Executive Director, City of Santa Barbara Housing Authority  
Fredrick Lamont, Executive Director, County of Santa Barbara Housing Authority  
Jaime Valdez, City of Goleta Economic Development Coordinator, Affordable Housing Task Force

Attachments: Draft RHNA Allocation  
Adopted RHNA Methodology and supporting data

### Draft RHNA Allocation

Based on the allocation methodology adopted by the SBCAG Board on December 20, 2012, the following table shows the resulting draft RHNA allocation for all SBCAG member jurisdictions:

#### *RHNA by Income Level for Santa Barbara County Jurisdictions*

	<b>Very</b>			<b>Above</b>	
	<b>Low</b>	<b>Low</b>	<b>Moderate</b>	<b>Moderate</b>	<b>Total</b>
<b>South County</b>	1,356	964	1,118	2,305	5,743
<b>Carpinteria</b>	39	26	34	64	163
<b>Santa Barbara</b>	962	701	820	1,617	4,099
<b>Unincorporated</b>	120	80	90	210	501
<b>Goleta</b>	235	157	174	413	979
<b>Santa Ynez Valley M.A.</b>	110	73	73	202	457
<b>Solvang</b>	42	28	30	75	175
<b>Buellton</b>	66	44	41	124	275
<b>Unincorporated</b>	2	1	1	3	7
<b>Lompoc Valley M.A.</b>	138	92	101	244	575
<b>Lompoc</b>	126	84	95	221	525
<b>Unincorporated</b>	12	8	7	24	50
<b>Santa Maria Valley M.A.</b>	1,021	681	758	1,795	4,255
<b>Santa Maria</b>	985	656	730	1,731	4,102
<b>Guadalupe</b>	12	8	13	18	50
<b>Unincorporated</b>	25	16	14	47	103
<b>Unincorporated Total</b>	159	106	112	284	661
<b>County Total</b>	2,625	1,810	2,053	4,542	11,030

### 2014-2022 RHNA Allocation Methodology

On April 27, 2012, SBCAG received its final determination of 11,030 units from the State Housing and Community Development Department (HCD) for the regional housing needs assessment (RHNA) for the projection period from January 1, 2014 through September 30, 2022.

The methodology for allocation of the RHNA allocates the identified regional housing need to SBCAG member jurisdictions in a two-step process. In the first step, housing need is allocated to the housing market area level (North County and the South Coast), giving weight to three statutory factors: existing jobs (80%), job growth (10%) and household growth (10%). In the second step, housing need is allocated from the market area level to the jurisdiction level based on existing, available residential land use capacity as updated by each jurisdiction. In this manner, the methodology addresses important planning factors by market area and results in an allocation within the existing overall residential land use capacity of each jurisdiction.

The methodology includes a modification originally proposed by the Cities of Buellton, Lompoc and Solvang that adjusts allocations between these three jurisdictions in the North County market area (Buellton, Solvang and Lompoc) to address local opportunities, constraints and market demand and bring them below their respective 2008 allocations. This modification occurs following the Step 2 allocation based on land use availability and makes the following adjustments: Buellton (+135 units), Solvang (-37 units), and Lompoc (-98 units).

By heavily weighting existing jobs, this RHNA methodology focuses on the existing jobs/housing imbalance and favors an allocation to the South Coast market area, where most existing jobs in the region are located. Lesser weightings for job and housing growth acknowledge that only modest growth is anticipated through this housing cycle. Housing market areas are defined for purposes of the methodology as the North County and South County.

Distribution of units by income level follows the same approach employed by SBCAG in both 2003 and 2008, which, consistent with State law, adjusts the proportion of low and very low income groups in each jurisdiction to equal the region-wide average distribution. SBCAG is required to assign the allocations to each jurisdiction according to four household income levels (very low, low, moderate and above moderate). According to this method, housing need by income group is distributed so as to adjust the proportion of low and very low income groups in each jurisdiction to equal the region-wide average distribution. For example, for a jurisdiction that has 41% very low income households as a proportion of total households, the jurisdiction's percentage is compared to the region-wide average of 24%. The resulting adjustment for the jurisdiction is -17% so that its adjusted share of very low income housing need is lowered from 41% to the region-wide average of 24%. Conversely, a jurisdiction with a relatively low proportion (e.g., 12%) of very low income households is adjusted upward (by +12% to 24%) to equal the region-wide average. This same process is then applied to the low income unit distributions. In order for all income level distributions to total 100 percent, the moderate and above moderate income distributions are adjusted to reflect changes to the very low and low categories. For example, a -17% adjustment in the very low category would require a +17% adjustment in the moderate income category.

The following table depicts the first two steps of the methodology:

Jurisdiction	Step 1			Total	Step 2		Final Allocation
	Existing Jobs 80%	Job Growth 10%	Household Growth 10%		By Land Use Capacity	Adjustment	
<b>South County</b>	5,373	287	84	5,744			
Carpinteria					163		163
Santa Barbara					4,099		4,099
Goleta					979		979
Unincorporated					501		501
<b>North County</b>	3,451	815	1,020	5,286			
Solvang					212	-37	175
Buellton					140	135	275
Lompoc					623	-98	525
Santa Maria					4,102		4,102
Guadalupe					50		50
Unincorporated					161		161
<b>Total County</b>	<b>8,824</b>	<b>1,102</b>	<b>1,104</b>	<b>11,030</b>	<b>11,030</b>		<b>11,030</b>

Applying the methodology, including income distribution, the following table shows the resulting RHNA allocation:

#### Underlying Data and Assumptions

Existing Jobs, Job and Household Growth, Zoning Capacity and Jobs Housing Balance Ratio

Jurisdiction	2010	Jobs	Households	Zoning Capacity	Jobs Housing Ratio
	Jobs	2014-2022 Growth	2014-2022 Growth		
<b>South County Market Area</b>	113,993	6,402	244	7,108	1.43
Carpinteria City	5,896	517	74	202	1.09
Santa Barbara	60,659	1,475	128	5,074	1.60
Unincorporated	16,828	800	4	620	1.02
Goleta City	25,290	3,610	39	1,212	1.93
<b>North County Market Area</b>	73,227	18,211	2,991	11,178	1.00
Santa Ynez Valley	12,423	2,234	250	760	1.27
Solvang City	3,206	152	31	448	1.29
Buellton City	2,210	1,744	217	297	1.20
Unincorporated	7,007	338	3	15	1.28
Lompoc Valley	19,474	1,173	4	1,423	0.96
Lompoc City	10,697	837	4	1,317	0.74
Unincorporated	8,777	336	-	106	1.51
Santa Maria Valley	40,977	14,803	2,737	8,995	0.96
Santa Maria	33,944	13,534	2,608	8,673	1.20
Guadalupe	677	32	124	105	0.36
Unincorporated	6,356	1,237	5	217	0.51
Cuyama Valley	353	-	-	-	0.53
Unincorp. Total	47,783	2,711	11	958	0.97
<b>Countywide Total</b>	<b>187,220</b>	<b>24,613</b>	<b>3,235</b>	<b>18,286</b>	<b>1.22</b>

Source: 2010 Jobs from InfoUSA jobs database, job and household growth from the draft 2012 SBCAG Regional Growth Forecast, zoning capacity from updated Housing Element data.

### Existing Percentage of Household Income Distribution by Jurisdiction

	Very			Above
	Low	Low	Moderate	Moderate
<b>South County</b>	25	15	18	42
Carpinteria	26	16	18	39
Santa Barbara	24	16	19	41
Unincorporated	28	14	14	44
Goleta	21	16	20	42
Santa Ynez Valley M.A.	23	16	18	43
Solvang	19	14	22	45
Buellton	25	15	14	46
Unincorporated	25	17	17	41
Lompoc Valley M.A.	23	16	18	43
Lompoc	25	16	18	42
Unincorporated	19	17	18	46
Santa Maria Valley M.A.	21	17	20	41
Santa Maria	22	17	20	41
Guadalupe	36	21	15	28
Unincorporated	16	18	22	44
<b>Unincorporated Total</b>	23	16	17	44
<b>County Total</b>	24	16	18	42

Source: 2006-2010 Census American Community Survey

**Appendix D  
Resolution**

A RESOLUTION OF THE SANTA BARBARA  
COUNTY ASSOCIATION OF GOVERNMENTS

APPROVAL OF THE 2013 REGIONAL HOUSING NEEDS      RESOLUTION NO. 13-18  
ALLOCATION PLAN AND CONSISTENCY WITH THE  
SUSTAINABLE COMMUNITIES STRATEGY

WHEREAS the Santa Barbara County Association of Governments (SBCAG) has been designated as the Metropolitan Planning Organization for Santa Barbara County; and

WHEREAS, as the region's Metropolitan Planning Organization, SBCAG is responsible for allocating the State-determined regional housing need to all local jurisdictions within the SBCAG region in accordance with State housing law, a process known as the development of the Regional Housing Needs Allocation ("RHNA"); and

WHEREAS SBCAG commenced work on the 2014-2022 RHNA in 2012, whereby SBCAG staff began working collaboratively with local jurisdictions as part of the agency's Regional Transportation Plan (RTP) and Sustainable Communities Strategy (SCS) planning process to improve the connection between land use, transportation, and housing to meet the region's greenhouse gas reductions targets as required by Senate Bill 375; and

WHEREAS, on April 27, 2012, the State Department of Housing and Community Development (HCD) provided SBCAG with its regional housing need determination of 11,030 units for the period from January 1, 2014 to September 30, 2022;

WHEREAS SBCAG is required to adopt a final RHNA that allocates a total regional housing need at or above HCD's determination among all eight cities and the County proportional to the income category percentages; and

WHEREAS in public meetings throughout the summer of 2012, SBCAG staff and the Technical Planning Advisory Committee (TPAC), which is comprised of representatives from the planning departments of SBCAG member agencies, developed a draft RHNA methodology that was consistent with the preferred land use scenario in the RTP-SCS and unanimously recommended it for SBCAG Board adoption.

WHEREAS, on September 20, 2012, the SBCAG Board directed staff to issue and staff did issue of the proposed draft RHNA methodology for a 60-day public comment period; and

WHEREAS, on December 20, 2012, following the 60-day public comment period, the SBCAG Board adopted the RHNA methodology and directed staff to issue the draft allocation to SBCAG member agencies for a 60-day period in which to request revisions to their allocation that yielded no requested revisions;

NOW, THEREFORE, BE IT RESOLVED that the SBCAG Board of Directors finds and determines that the above recitals are true and correct.

BE IT FURTHER RESOLVED that the SBCAG Board of Directors finds that RHNA Plan is consistent with the following objectives, as set forth in more detail in Government Code 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.

BE IT FURTHER RESOLVED that the SBCAG Board of Directors finds that the 2014-2022 RHNA is consistent with the 2013 RTP and SCS for 2040.

PASSED AND ADOPTED this 18<sup>th</sup> day of July 2013 by the following vote:

AYES:

NOES:

ABSENT:

ABSTAIN:

ATTEST:

---

Jim Kemp  
Executive Director

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Roger Aceves, Chair  
Santa Barbara County  
Association of Governments

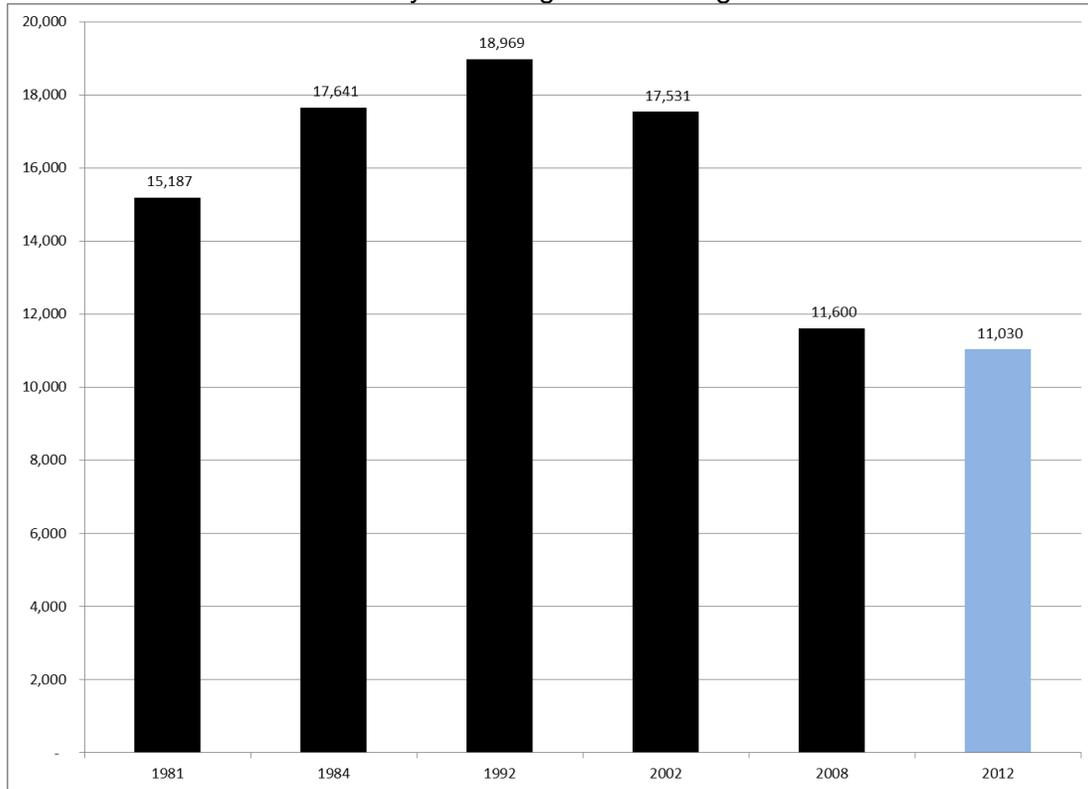
APPROVED AS TO FORM:

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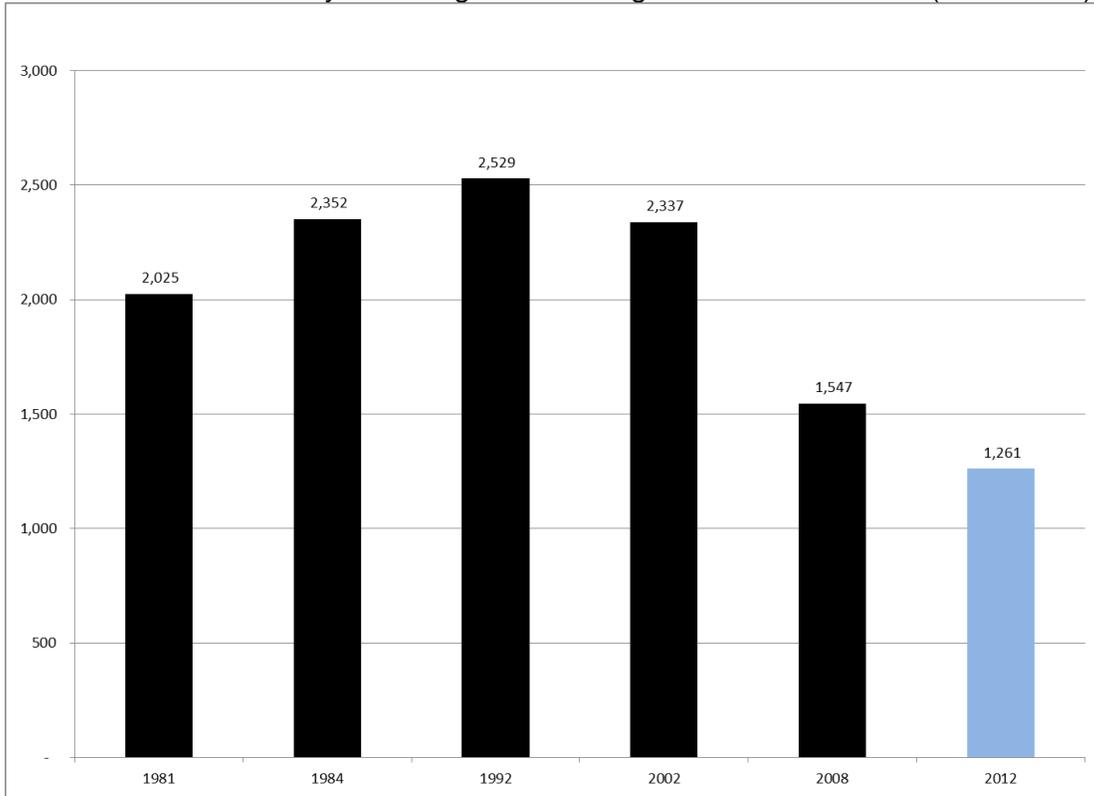
William M. Dillon  
Senior Deputy County Counsel

## Appendix E Prior and Current RHNA Allocations

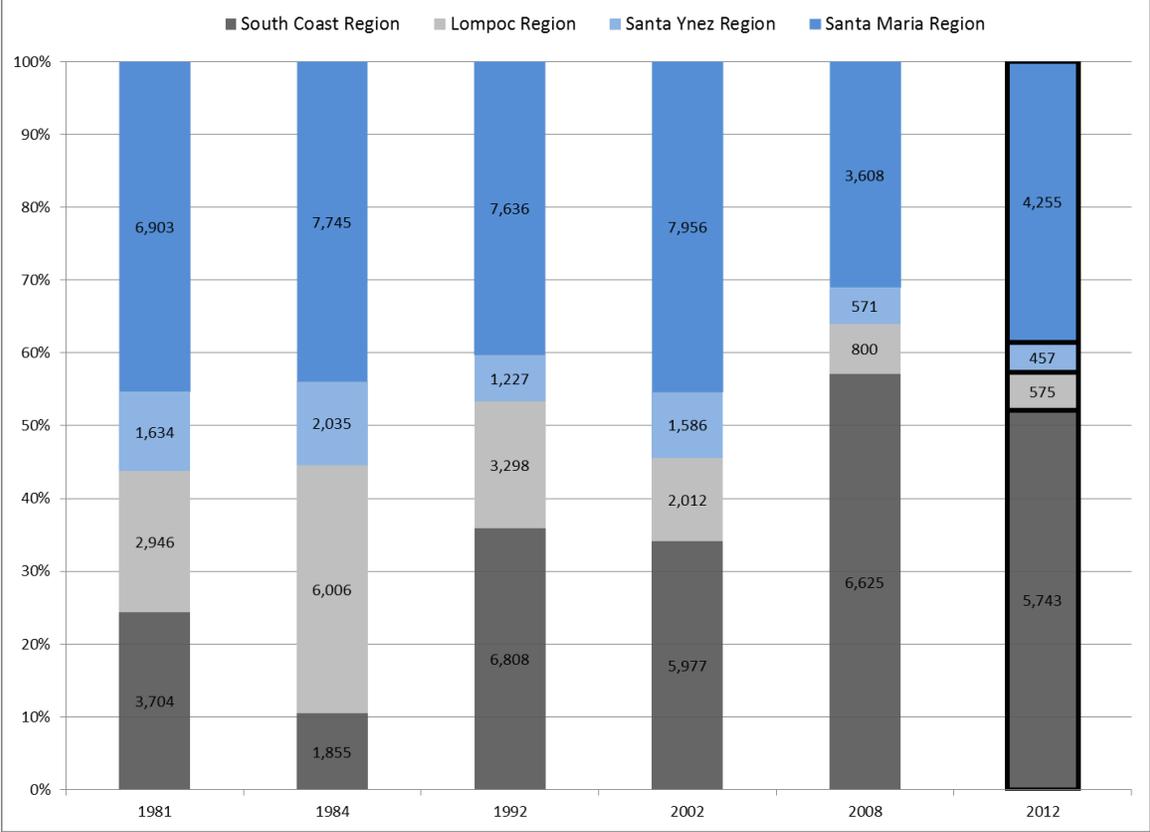
Prior and Current County-wide Regional Housing Needs Assessments



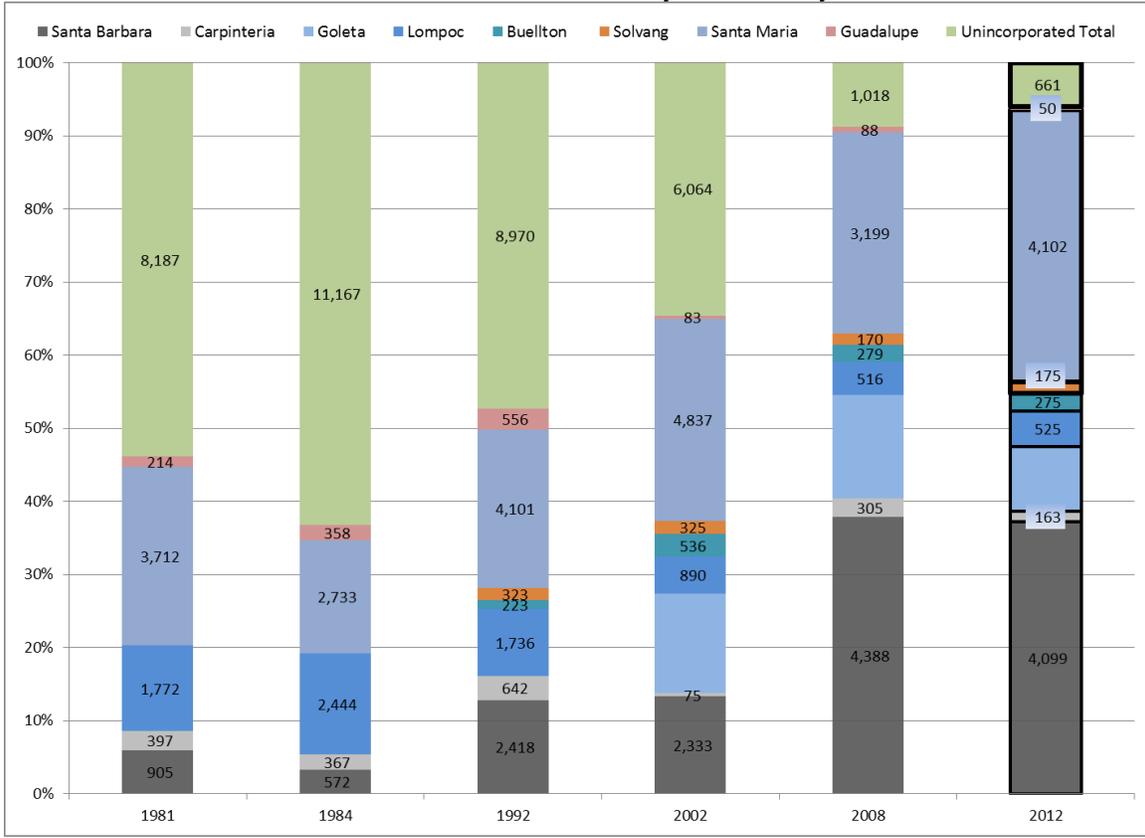
Prior and Current County-wide Regional Housing Needs Assessments (Annualized)



Prior and Current RHNA Allocations by Region



### Prior RHNA Allocations by Community



**Appendix F**  
**Excerpts from Housing Element Law: Government Code §§ 65584 and 65584.04**  
**State of California Legislative Information, January 2013**

**65584.**

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

(2) While it is the intent of the Legislature that cities, counties, and cities and counties should undertake all necessary actions to encourage, promote, and facilitate the development of housing to accommodate the entire regional housing need, it is recognized, however, that future housing production may not equal the regional housing need established for planning purposes.

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

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

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

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

(2) Promoting infill development and socioeconomic equity, the protection of environmental and agricultural resources, and the encouragement of efficient development patterns.

(3) Promoting an improved intraregional relationship between jobs and housing.

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

(e) For purposes of this section, "household income levels" are as determined by the department as of the most recent decennial census pursuant to the following code sections:

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

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

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

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

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

*(Amended by Stats. 2007, Ch. 5, Sec. 1. Effective April 10, 2007.)*

#### **65584.04.**

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

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

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

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

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

(c) Public participation and access shall be required in the development of the methodology and in the process of drafting and adoption of the allocation of the regional housing needs. Participation by organizations other than local jurisdictions and councils of governments shall be solicited in a diligent effort to achieve public participation of all economic segments of the community. The proposed methodology, along with any relevant underlying data and assumptions, and an explanation of how information about local government conditions gathered pursuant to subdivision (b) has been used to develop the proposed methodology, and how each of the factors listed in subdivision (d) is incorporated into the methodology, shall be distributed to all cities, counties, any subregions, and members of the public who have made a written request for the proposed methodology. The council of governments, or delegate subregion, as applicable, shall conduct at least one public hearing to receive oral and written comments on the proposed methodology.

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

(1) Each member jurisdiction's existing and projected jobs and housing relationship.

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

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

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

(C) Lands preserved or protected from urban development under existing federal or state programs, or both, designed to protect open space, farmland, environmental habitats, and natural resources on a long-term basis.

(D) County policies to preserve prime agricultural land, as defined pursuant to Section 56064, within an unincorporated area.

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

(4) The market demand for housing.

(5) Agreements between a county and cities in a county to direct growth toward incorporated areas of the county.

(6) The loss of units contained in assisted housing developments, as defined in paragraph (9) of subdivision (a) of Section 65583, which changed to non-low-income use through mortgage prepayment, subsidy contract expirations, or termination of use restrictions.

(7) High-housing cost burdens.

(8) The housing needs of farmworkers.

(9) The housing needs generated by the presence of a private university or a campus of the California State University or the University of California within any member jurisdiction.

(10) Any other factors adopted by the council of governments.

(e) The council of governments, or delegate subregion, as applicable, shall explain in writing how each of the factors described in subdivision (d) was incorporated into the methodology and how the methodology is consistent with subdivision (d) of Section 65584. The methodology may include numerical weighting.

(f) Any ordinance, policy, voter-approved measure, or standard of a city or county that directly or indirectly limits the number of residential building permits issued by a city or county shall not be a justification for a determination or a reduction in the share of a city or county of the regional housing need.

(g) In addition to the factors identified pursuant to subdivision (d), the council of governments, or delegate subregion, as applicable, shall identify any existing local, regional, or state incentives, such as a priority for funding or other incentives available to those local governments that are willing to accept a higher share than proposed in the draft allocation to those local governments by the council of governments or delegate subregion pursuant to Section 65584.05.

(h) Following the conclusion of the 60-day public comment period described in subdivision (c) on the proposed allocation methodology, and after making any revisions deemed appropriate by the council of governments, or delegate subregion, as applicable, as a result of comments received during the public comment period, each council of governments, or delegate subregion, as applicable, shall adopt a final regional, or subregional, housing need allocation methodology and provide notice of the adoption of the methodology to the jurisdictions within the region, or delegate subregion as applicable, and to the department.

(i) (1) It is the intent of the Legislature that housing planning be coordinated and integrated with the regional transportation plan. To achieve this goal, the allocation plan shall allocate housing

units within the region consistent with the development pattern included in the sustainable communities strategy.

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

(3) The resolution approving the final housing need allocation plan shall demonstrate that the plan is consistent with the sustainable communities strategy in the regional transportation plan.

*(Amended by Stats. 2008, Ch. 728, Sec. 10. Effective January 1, 2009.)*

**Appendix G**  
**2013 SBCAG Membership Roster**  
**Revised 3/20/13**

<u>SUPERVISORS</u>	<u>Member</u>	<u>Supervisorial District</u>
	SALUD CARBAJAL	FIRST DISTRICT
	JANET WOLF	SECOND DISTRICT
	DOREEN FARR	THIRD DISTRICT
	PETER ADAM	FOURTH DISTRICT
	STEVE LAVAGNINO (Vice Chair)	FIFTH DISTRICT

<u>CITIES</u>	<u>Member</u>	<u>Alternate</u>
BUELLTON	HOLLY SIERRA Councilmember	JUDITH DALE Mayor
CARPINTERIA	AL CLARK Councilmember	WADE NOMURA Councilmember
GOLETA	ROGER ACEVES (Chair) Mayor	MICHAEL BENNETT Mayor pro tem
GUADALUPE	FRANCES ROMERO Mayor	JERRY TUCKER Councilmember
LOMPOC	JOHN LINN Mayor	BOB LINGL Councilmember
SANTA BARBARA	HELENE SCHNEIDER Mayor	GRANT HOUSE Councilmember
SANTA MARIA	ALICE PATINO Mayor	JACK BOYSEN Councilmember
SOLVANG	JIM RICHARDSON Mayor	ED SKYTT Councilmember

EX-OFFICIO (NON-VOTING) MEMBERS

CALTRANS DISTRICT 5	TIM GUBBINS
19 <sup>th</sup> SENATE DISTRICT	HANNAH BETH JACKSON
35 <sup>th</sup> ASSEMBLY DISTRICT	KATCHO ACHADJIAN
37 <sup>th</sup> ASSEMBLY DISTRICT	DAS WILLIAMS

**Appendix H**  
**A: 2013 Technical Planning Advisory Committee Membership Roster**

<b><u>JURISDICTION</u></b>	<b><u>MEMBER</u></b>	<b><u>ALTERNATE</u></b>
<b>BUELLTON</b> 107 West Highway 246 Buellton, CA 93427 (805) 686-0137	<b>MARC BIERDZINSKI (Chair)</b> Planning Director	<b>ANGELA PEREZ</b> Assistant Planner
<b>CARPINTERIA</b> 5775 Carpinteria Avenue Carpinteria, CA 93013 (805) 684-5405	<b>JACKIE CAMPBELL</b> Community Development Director	<b>DAVE DURFLINGER</b> City Manager
<b>GOLETA</b> 130 Cremona Goleta, CA 93117 (805) 961-7500	<b>ANNE WELLS</b> Advanced Planning Manager	<b>SARA IZA</b> Associate Planner
<b>GUADALUPE</b> 918 Obispo Street Guadalupe, CA 93434 (805) 343-1340	<b>RICHARD DAULTON</b> Consulting Planner, Rincon Consultants	<b>ANDREW CARTER</b> City Administrator
<b>LOMPOC</b> 100 Civic Center Plaza Lompoc, CA 93436 (805) 736-1261	<b>LUCILLE BREESE</b> Planning Manager	<b>KEITH NEUBERT</b> Principal Planner
<b>SANTA BARBARA</b> 630 Garden St. Santa Barbara, CA 93101 (805) 564-5470	<b>JOHN LEDBETTER</b> <b>(Vice Chair)</b> Principal Planner, Community Development Department	<b>BETTIE WEISS</b> City Planner
<b>SANTA MARIA</b> 110 East Cook Street Santa Maria, CA 93454 (805) 925-0951	<b>LARRY APPEL</b> Director	<b>BILL SHIPSEY</b> Planner III
<b>SOLVANG</b> 1644 Oak St. Solvang, CA 93463 (805) 688-5575	<b>ARLENE PELSTER</b> Planning Director	<b>LISA MARTIN</b> Associate Planner
<b>COUNTY OF SANTA BARBARA</b> 123 E. Anapamu St. Santa Barbara, CA 93101	<b>JEFF HUNT</b> Director Long Range Planning	<b>ALLEN BELL (apptd 05/08/12)</b> Supervisory Planner Long Range Planning

**SPECIAL DISTRICT REPRESENTATIVES**

**MEMBER**

**ALTERNATE**

SB COUNTY AIR POLLUTION  
CONTROL DISTRICT  
260 N. San Antonio Rd., Ste. A  
Santa Barbara, CA 93110  
(805)961-8800

MOLLY PEARSON  
Community  
Supervisor

Programs ERIC GAGE  
Air Quality Specialist