Fresno Council of Governments
Sixth Cycle Regional Housing Needs Allocation
Final Methodology
June 2022

INTRODUCTION

California housing law requires each local jurisdiction to plan to accommodate its share of the state's housing need. The Regional Housing Needs Allocation, or RHNA, is the process outlined in State law for determining the number of housing units in each of four affordability tiers (very low-, low-, moderate-, and above moderate-income) assigned to each jurisdiction in a region for the eight-year RHNA cycle.

The RHNA process generally begins with the issuance of a Regional Housing Needs Determination (Regional Determination) from the California Department of Housing and Community Development (HCD), which assigns the number of housing units to a region in each income tier for the RHNA cycle and is meant to equal the number of housing units needed to address a region's existing and projected housing need over the eight-year period. The region's council of governments is then responsible for developing a methodology to distribute the Regional Housing Needs Determination among all jurisdictions in the region. Finally, each local jurisdiction is responsible for accommodating the assigned units in the housing element of its general plan.

The methodology is developed in three phases: first, a proposed methodology is prepared and undergoes a public hearing. The methodology may be revised based on any input received, then a draft methodology is submitted to HCD for a 60-day review. Finally, the methodology may be revised to respond to HCD's findings, and a final methodology is adopted by resolution. Following adoption, the final methodology is incorporated into a RHNA Plan document, which must undergo a shorter, two-phase review process.

In accordance with California law, Fresno Council of Governments (Fresno COG) has prepared this Methodology for its sixth RHNA cycle, the housing projection period beginning June 30, 2023, and ending December 31, 2031. The Methodology was developed with the guidance of the Fresno COG RHNA Subcommittee (RHNA Subcommittee), a 20-member advisory committee composed of representatives from each of the 16 Fresno COG member jurisdictions; three at-large members representing Fresno Building Industry Association, the Fresno Housing Authority, and Leadership Counsel for Justice and Accountability; and a nonvoting representative from HCD. The Methodology underwent a 30-day public review period, a public hearing, and was reviewed and commented on by the Fresno COG Transportation Technical Committee, Policy Advisory Committee, and Policy Board. This Final Methodology includes revisions from the Proposed Methodology, based on input provided during the review period. The Methodology consists of two primary components: the overall jurisdictional allocation and the distribution of units by income tier. Following is an overview of the methodology of each component in addition to an analysis of how the resulting allocation works to further five statutory objectives.

JURISDICTIONAL ALLOCATION

The Fresno COG Regional Determination, established by HCD in consultation with Fresno COG, totals 58,298 housing units. This Methodology distributes the allocation across Fresno COG's 16 member jurisdictions in accordance with regional and State goals, priorities, and objectives. To do so, the Methodology begins with a base allocation, then adjusts the allocations from the base using five weighted factors.

The base allocation is a starting point that shows the generalized number of housing units to be assigned to each jurisdiction based on the overall relative sizes of the jurisdictions. In Fresno COG's Methodology, the base allocation is derived equally from two data sets:

» Share of existing (2021) population within each jurisdiction (excluding spheres of influence (SOI) and populations living in group quarters).[1]

» Share of expected population growth 2020-2050 (including SOIs and excluding population living in group quarters).[2]

The base allocation of housing units for each jurisdiction is calculated by multiplying each of these two shares by the Regional Determination, dividing the result in half (to apply the 50% weight), and summing the two results, as illustrated below. The resultant base allocation is shown in **Table 1**.

Jurisdiction's share of existing population x 58,298 housing units x 0.5

+

Jurisdiction's share of population growth x 58,298 housing units x 0.5

Jurisdiction's base allocation

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[1] Source: Department of Finance, Table E-5, 2020.
[2] Source: Fresno COG 2019-2050 Growth Projections, 2020.

TABLE 1   BASE ALLOCATION

Jurisdiction	Share of Base Allocation Derived from Share of Existing Population (2021) not including SOI	Share of Base Allocation Derived from Share of Regional Population Growth 2020–2050, including SOI	Final Base Allocation: (50% weights applied and result summed)
Clovis*	4,280	3,459	7,739
Coalinga*	385	476	861
Firebaugh*	373	231	604
Fowler*	197	188	385
Fresno*	17,751	15,524	33,275
Huron	183	210	393
Kerman*	565	457	1,022
Kingsburg*	454	372	826
Mendota*	360	353	713
Orange Cove	294	272	566
Parlier*	435	449	884
Reedley*	746	741	1,487
Sanger*	883	776	1,659
San Joaquin*	92	117	209
Selma*	966	695	1,661
Unincorporated County	1,185	4,829	6,014
Total	29,149	29,149	58,298

Source: Fresno COG 2019-2050 Growth Projections, 2020; California Department of Finance, Table E-5, 2021; PlaceWorks, 2021

* Due to rounding, the initial total allocations do not sum to the regional determination of 58,298, so the base allocations shown above include adjustments of 0.5 or -0.5 to some jurisdictions shares in one or more columns.

The base allocation establishes a foundational allocation of RHNA units for each jurisdiction that accounts for the significant size differences between jurisdictions. For example, according to the California Department of Finance (DOF), the most populous city in the region and the fifth most populous city in California, the City of Fresno, has 123 times the population and nearly 200 times more housing units than the least populous jurisdiction in the Fresno COG region, the City of San Joaquin.

The base allocation also incorporates differences in expected future growth between jurisdictions. The 2020–2050 Fresno COG Growth Projections attribute 61% of anticipated regional housing growth to the City of Fresno and only 0.31% to the City of San Joaquin. Though these jurisdictions are anticipated to experience vast differences in numeric growth, these projections represent similar percentage housing unit increases relative to their current numbers, with Fresno expected to grow by 23% of the city's 2020 population and San Joaquin expected to grow by 18% of its 2020 population, both by the year 2050.

ALLOCATION FACTORS

Using the base allocation as a foundation, the Methodology adjusts each jurisdiction's allocation using a combination of weighted factors. All factors are configured so that higher scores indicate that the jurisdiction is more favorable to support housing, and lower scores indicate less favorable conditions for housing. For example, jurisdictions with more jobs receive higher scores for regional share of jobs, and jurisdictions with high fire risk

receive a lower score for fire risk, resulting in more housing units assigned to jurisdictions with more jobs and lower risk of wildfire.

In preparation for choosing the allocation factors, Fresno COG collected and analyzed more than 30 data layers to assess the following:

» Existing affordable housing stock

» Homelessness

» Housing unit types and tenure

» Housing vacancy

» Current population and the distribution of household growth in the Regional Transportation Plan (the base allocation)

» Cost-burdened households

» Overcrowding

» Vehicle miles traveled

» Transit connectivity

» Jobs (current and projected)

» Jobs-housing balance and jobs-housing fit (lower-wage jobs and affordable housing)

» Opportunity measures

» Childhood poverty status

» Loss of housing units from the Creek Fire

» Wildfire risk

» Flood and erosion hazards

» Groundwater supply

» Designated agricultural land

» Protected and/or sensitive environmental lands (including national and state park and forest land)

After thoughtful consideration spanning multiple meetings of the RHNA Subcommittee; data review sessions with jurisdiction representatives, Fresno COG staff, and consultants; and consultation with HCD, Fresno COG selected the factors listed below to adjust the base RHNA allocation for each jurisdiction. Each of the factors advances important priorities in the Fresno COG region and statutory RHNA objectives:

» Percentage of non-vacant housing units in each jurisdiction (relative to each jurisdiction's total housing stock).

» TCAC Opportunity Score (average score across census geographies within each jurisdiction from the California TCAC (Tax Credit Allocation Committee) Opportunity Maps).

» Regional share of jobs in 2020 (the percentage of jobs in each jurisdiction relative to the entire county)

» Regional share of projected job growth between 2020 and 2035.

» Percent of developable or "unconstrained" land, defined as land that is not protected from development due to status as important farmland, sensitive wildlife habitat or wetland, or conservation land and that is not in areas at high risk of environmental hazards, including flooding, wildfire, erosion, and earthquakes.

To use the selected factors to assign housing units, each factor is normalized on a scale of 0.5 to 1.5. The normalized scale serves two purposes:

1. It supports ease of computation and comparison of factors among each other.

2. The range of the scale (0.5 to 1.5) is large enough to impact the distribution of housing units by adjusting them up (any score between 1 and 1.5) or down (any score between 0.5 and 1) from the base allocation, but not so large that the base allocation loses its value.

Each factor and its scaled score by jurisdiction are shown in **Table 2** and described in more detail below.

TABLE 2   FACTORS AND SCALED SCORES

Jurisdiction	Non-vacant Units	HCD/TCAC Opportunity Score	Regional Share of Current Jobs (2020)	Regional Share of Projected Job Growth (2020–2035)	Percentage of Unconstrained Land
Clovis	1.17	1.50	0.64	0.67	1.33
Coalinga	0.50	0.68	0.51	0.51	0.95
Firebaugh	1.23	0.62	0.50	0.51	0.72
Fowler	1.14	0.83	0.51	0.52	1.45
Fresno	1.10	0.80	1.50	1.50	1.13
Huron	1.07	0.50	0.50	0.51	0.69
Kerman	1.50	0.81	0.51	0.53	1.45
Kingsburg	1.50	1.03	0.51	0.52	1.50
Mendota	1.30	0.65	0.50	0.50	1.08
Orange Cove	0.99	0.88	0.50	0.50	1.17
Parlier	1.05	0.57	0.51	0.51	1.21
Reedley	1.29	0.89	0.52	0.53	1.38
Sanger	1.18	0.67	0.52	0.52	1.37
San Joaquin	1.03	0.84	0.50	0.50	1.21
Selma	1.14	0.67	0.52	0.54	1.43
Unincorporated County	1.43	0.90	0.79	0.75	0.50

See below for source details for each data set.

Non-vacant Units

This is the percentage of units in each jurisdiction that are not vacant, resulting in a higher RHNA allocation to jurisdictions that currently have lower vacancy rates. This factor represents an indicator of housing need in each jurisdiction and comes from the DOF, Table E-5, for the year 2020.

TCAC Opportunity Score

The TCAC Opportunity Map scoring factor supports the State's goal to affirmatively further fair housing by facilitating the development of affordable housing in high opportunity / high amenity areas. TCAC opportunity scores are calculated at the census tract level (for urban areas) and the block group level (for rural areas) using 21 indicators: income, adult educational attainment, labor force participation, job proximity, median home value, 12 environmental health/pollution indicators, 4th-grade math proficiency, 4th-grade reading proficiency, high school graduation rate, and students living above the federal poverty level.

TCAC scores for each jurisdiction are calculated by taking the average 2021 TCAC scores across all tracts/block groups in each jurisdiction. Where a census geography crosses the boundary of multiple jurisdictions, a proportionate share of the TCAC index score was added to each jurisdiction's average score.

Jobs (Current and Projected)

Allocating more housing to jurisdictions with higher concentrations of jobs can alleviate housing demand pressure in job-rich areas while reducing regional vehicle miles traveled (VMT) and associated greenhouse gas (GHG) emissions because of long commutes to and from work. Both current regional shares of jobs and regional shares of expected job growth are included in the methodology to allocate more housing where jobs are currently concentrated and where job growth is expected. Current jobs data were sourced from the California Employment Development Department (EDD, 2020), and job projections were sourced from Fresno COG Growth Forecasts (2021).

Unconstrained Land

Fresno County is one of the most productive agricultural regions in the world; the county produced nearly eight billion dollars of agricultural products in 2019. Fresno County is also home to several national and state parks and national forests, including Sierra National Forest, Sequoia National Forest, and Kings Canyon National Park. The unconstrained land factor was included in the methodology to allocate more housing to jurisdictions with greater shares of land suitable for housing development, which excludes important farmland, conservation land and biological resources, and land with high risk of environmental hazards.

The percentage of unconstrained land (relative to each jurisdiction's total acreage) is the percent acreage of land in each jurisdiction that is not constrained by one or more of the following factors:

» Land designated as important farmland by the California Department of Conservation's Farmland Mapping and Monitoring Program (FMMP), which includes the following categories:

o Prime farmland, unique farmland, farmland of statewide or local importance, and grazing land.

» Land registered as "Williamson Act" land by Fresno County, that is, parcels designated for agricultural use or related open space use under the Williamson Act, or California Land Conservation Act of 1965.

» Land designated for conservation or that is biologically sensitive. This includes wetlands (from the National Wetlands Inventory or NWI), any land within a state park or national park or forest, and land that is designated as "critical habitat" by the California Natural Diversity Database (CNDDB).

» Land within areas with the following environmental hazard risk designations:

o Wildfire: high and very-high wildfire risk areas, based on CAL FIRE's Fire and Resource Assessment Program designations.

o Flooding: 100-year and 500-year flood zones based on FEMA's National Flood Hazard Layer.

o Soil Erosion: Moderate and severe soil erosion risk areas based on the US Department of Agriculture's Soil Survey Geographic database.

o Earthquakes, based on fault location data and Alquist-Priolo zones from the US Geological Survey.

The acreage of constrained land is subtracted from the total acreage of land in each jurisdiction to obtain the unconstrained land factor, and jurisdictions with higher percent acreages of unconstrained land (relative to their total acreage) are allocated more housing.

FACTOR WEIGHTING

Following selection of the factors, Fresno COG and its subcommittee assigned weights to each for use in the allocation process. These weights establish what percentage of the total RHNA allocation is distributed to each jurisdiction based on that factor. All selected factor weights are listed below. Table 3 shows the resulting factor-adjusted allocations for each jurisdiction.

- » Percent of non-vacant housing units: 35%
- » TCAC Opportunity score: 20%
- » Regional share of jobs in 2020: 12.5%
- » Regional share of projected job growth between 2020 and 2035: 12.5%
- » Percentage of unconstrained land: 20%

TABLE 3   BASE ALLOCATION AND FACTOR ADJUSTMENT

Jurisdiction	Base Allocation	Factor-Adjusted Allocation	Net Change
Clovis	7,739	8,759	1,020
Coalinga	861	552	(309)
Firebaugh	604	432	(172)
Fowler	385	331	(54)
Fresno	33,275	35,972	2,697
Huron	393	311	(82)
Kerman	1,022	1,037	15
Kingsburg	826	861	35
Mendota	713	626	(87)
Orange Cove	566	458	(108)
Parlier	884	715	(169)
Reedley	1,487	1,428	(59)
Sanger	1,659	1,458	(201)
San Joaquin	209	195	(14)
Selma	1,661	1,456	(205)
Unincorporated County	6,014	3,707	(2,307)
Total	58,298	58,298	-

INCOME ALLOCATION METHODOLOGY

The regional housing allocation provided by HCD includes both a total number of housing units and a distribution of those housing units across four affordability tiers: very low-income, low-income, moderate-income, and above moderate-income. Once the overall allocation for each jurisdiction is finalized, each jurisdiction's housing unit allocation must be distributed among the four income tiers, and the sum allocation in each income tier across all jurisdictions must equal the total amount set by HCD. The Regional Determination for each income tier is shown in Table 5.

TABLE 5   FRESNO COG REGIONAL INCOME TIER ALLOCATION

	Units	Percentage of Total**
Very low*	15,592	26.7%
Low	9,143	15.7%
Moderate	9,047	15.5%
Above Moderate	24,516	42.1%
Total	**58,298**	**100%**

*Extremely low-income units are included in the very low-income category, constituting 14% of the total allocation.
**The percent allocations shown are rounded to the nearest tenth of a percent. The number of units shown in the first column is the exact amount allocated through the Regional Determination.

This Methodology uses the Income-Shift approach to distribute units by income tier to each jurisdiction. The Income-Shift approach distributes the total RHNA unit allocations of each jurisdiction (calculated in the previous step) between the four income tiers based on the relationship between the percentage of units in the income tier of the Regional Determination and each jurisdiction's existing share of units in the income tier. The adjustment factor determines the extent to which each jurisdiction's allocation of units by income tier will match the distribution of the Regional Determination or move all jurisdictions toward a more even distribution of units by income tier overall. An adjustment factor of 100% would result in all jurisdictions' allocation by income tier being equal to the percent distribution of the Regional Determination of that tier (e.g., 26.7% of each jurisdiction's allocation would be for the very low-income tier, equal to the 26.7% of units assigned to the region as very low-income). As the adjustment factor increases, each jurisdiction's allocation of units by income tier changes, depending on how much higher or lower the jurisdiction's existing distribution of units in that income tier is compared to the Regional Determination. For example, the Regional Determination in the low-income tier is 15.7%. A jurisdiction with only 11% of existing units in the low-income tier would receive an allocation greater than 15.7%, and a jurisdiction with an existing distribution of 35% of units in the low-income tier would receive an allocation lower than 15.7%. HCD recommends the adjustment factor be set at a minimum of 150%.

Fresno COG, following the guidance of the RHNA Subcommittee, selected an Income-Shift adjustment factor of 150%. The resultant distribution of units across all income tiers—the Draft Fresno COG 6th Cycle RHNA allocation—is shown in **Table 6**.

TABLE 6   DISTRIBUTION BY JURISDICTION BY INCOME TIER

Jurisdiction	Very Low		Low		Moderate		Above Moderate		Total Housing Units
	%	Housing Units	%	Housing Units	%	Housing Units	%	Housing Units	
Clovis**	32.6%	2,855	17.3%	1,512	16.1%	1,412	34.0%	2,980	8,759
Coalinga**	27.7%	153	16.8%	93	15.8%	87	39.7%	219	552
Firebaugh	22.9%	99*	10.2%	44*	14.8%	64*	52.1%	225*	432
Fowler	27.8%	92	16.6%	55	14.2%	47	41.4%	137	331
Fresno**	25.5%	9,166*	16.0%	5,742	15.3%	5,514*	43.2%	15,550*	35,972
Huron	14.1%	44*	13.8%	43*	16.7%	52*	55.3%	172*	311
Kerman**	26.8%	278	12.4%	129*	15.5%	161*	45.2%	469*	1,037
Kingsburg	28.1%	242	18.2%	157	17.1%	147	36.6%	315	861
Mendota	20.1%	126*	10.4%	65*	14.9%	93*	54.6%	342*	626
Orange Cove	14.0%	64*	10.3%	47*	18.3%	84*	57.4%	263*	458
Parlier	20.1%	144*	12.7%	91*	14.5%	104*	52.6%	376*	715
Reedley	27.6%	394	12.3%	176*	14.2%	203*	45.9%	655*	1,428
Sanger	27.6%	402	12.8%	186*	16.2%	236*	43.5%	634*	1,458
San Joaquin	19.5%	38*	13.8%	27*	17.4%	34*	49.2%	96*	195
Selma	26.2%	381*	10.9%	158*	15.5%	226*	47.5%	691*	1,456
Unincorporated County	30.1%	1,114	16.7%	618	15.7%	583	37.6%	1,392	3,707
HCD Requirement	26.7%	15,592	15.7%	9,143	15.5%	9,047	42.1%	24,516	58,298

* The initial Income-Shift adjustment results in a discrepancy between the Regional Determination by income tier and the sum of allocations by income tier. To address this, Fresno COG made manual adjustments that resulted in reduced allocations of the very low- and/or low-income tiers for jurisdictions with an existing share of units in these income tiers that is greater than the Regional Determination and corresponding increases to those jurisdiction's allocations in the moderate- and above moderate-income tiers.

**Additional manual adjustments (of 1.0 or -1.0) were made to address discrepancies with the total allocation and the sum allocations by income tier resulting from rounding in previous steps.

STATUTORY OBJECTIVES

Following State law, the Methodology furthers all statutory objectives, as outlined below.

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

As described above, the distribution of units overall follows a data-driven process informed by regional priorities and statutory objectives to co-locate housing where there is need (35% weighting for the non-vacant units factor), opportunity (20% weighting for TCAC Opportunity Score factor), jobs (25% combined weighting for existing and future jobs factor), and land suitable for development (20% weighting for the unconstrained lands factor). Further, the methodology for allocating units in each income tier supports a redistribution of units, so that jurisdictions that currently have a lesser share of low- and very low-income units receive a larger share of units in those income tiers. The methodology allocates units in all four income tiers to each of the region's 16 jurisdictions.

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

The Methodology's incorporation of the Fresno COG Growth Forecast used in the Regional Transportation Plan as the base allocation further supports consistency of the Methodology with planning efforts to achieve regional GHG emission reduction targets by distributing RHNA units to areas expected to grow in population.

Additionally, the Methodology's 20% weight placed on the unconstrained lands factor allocates the preponderance of units to incorporated, urbanized municipalities and away from the unincorporated county, which constitutes 97% of Fresno County's total land acreage, of which only 8% is unconstrained. Allocating housing units to incorporated areas with existing public services and infrastructure supports infill and socioeconomic equity and protects environmental and agricultural resources located primarily in the unincorporated county.

Finally, the combined 25% weight on the two jobs factors encourages efficient development patterns by locating housing near current job centers and in areas where jobs are expected to grow, supporting efforts to minimize VMTs and GHG emissions.

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

A typical target relationship between the number of jobs and the number of housing units is between 1.3 and 1.6 jobs for every housing unit. Only the city of Fresno has achieved this balance, although multiple jurisdictions (and the countywide average) are only slightly under this ideal range, and the city of Kerman is slightly over this ideal range. In general, most jurisdictions in the region have an excess of housing units compared to jobs. Existing jobs and housing data are shown in **Table 7**.

TABLE 7   JOBS-HOUSING BALANCE

Jurisdiction	Total Jobs	Total Housing Units	Jobs-Housing Balance
Clovis	35,252	38,664	0.91
Coalinga	3,590	4,721	0.76
Firebaugh	1,557	2,151	0.72
Fowler	2,583	2,143	1.21
Fresno	236,014	178,831	1.32
Huron	239	1,812	0.13
Kerman	7,069	3,983	1.77
Kingsburg	4,774	4,077	1.17
Mendota	1,523	2,965	0.51
Orange Cove	770	2,834	0.27
Parlier	2,848	4,158	0.68
Reedley	9,401	7,333	1.28
Sanger	8,287	7,396	1.12
San Joaquin	698	1,043	0.67
Selma	6,682	7,511	0.89
Unincorporated County	59,710	61,520	0.97
County Total	**380,997**	**331,142**	**1.15**

Source: ACS, 2019 (for housing estimates); Longitudinal Employer-Household Dynamics (LEHD) Survey, 2019 (for jobs estimates).

The Methodology furthers the Jobs-Housing Balance RHNA Objective by including both current jobs and expected job growth as allocation factors at a combined 25% weight (12.5% each), thereby directing more housing units to jurisdictions with more existing and projected jobs so as not to exacerbate the imbalance of jobs to housing units. The Methodology allocates more units, relative to the base allocations, to three of the six jurisdictions with a current jobs-housing balance above 1.0 (the cities of Fresno, Kerman, and Kingsburg), therefore allocating more housing units to jurisdictions with more jobs. These three jurisdictions have higher TCAC scores than most others in the region, making them especially appropriate candidates for the addition of housing units based on job availability. The other jurisdictions with a current jobs-housing balance above 1.0 (the cities of Fowler, Reedley, and Sanger) do not receive greater allocations compared to their base due to the stronger impact of the non-vacant units, TCAC, and unconstrained lands factors, which serve the other statutory objectives. Further, except the city of Clovis, all jurisdictions with a current jobs-housing balance below 1.0 are allocated fewer units compared to their base allocations. Though Clovis has a smaller share of jobs relative to housing units, the city's allocation increases from the base in support of other objectives, especially objective 5.

Table 8 shows the same relationship between lower-wage jobs (those earning less than $3,333 per month) and housing units affordable at the low- and very low-income affordability thresholds, referred to as the "jobs-housing fit."

TABLE 8 JOBS-HOUSING FIT

Jurisdiction	Total Low-Wage Jobs (<$3,333/mo)	Total Housing Units (<80% AMI)	Jobs-Housing Fit
Clovis	22,824	10,250	2.23
Coalinga	1,561	1,626	0.96
Firebaugh	951	1,225	0.78
Fowler	1,911	800	2.39
Fresno	139,457	73,970	1.89
Huron	176	1,183	0.15
Kerman	5,584	1,795	3.11
Kingsburg	3,154	1,377	2.29
Mendota	1,114	1,812	0.61
Orange Cove	540	2,050	0.26
Parlier	1,805	2,286	0.79
Reedley	6,953	3,156	2.20
Sanger	5,706	3,108	1.84
San Joaquin	312	569	0.55
Selma	4,756	3,563	1.33
Unincorporated County	36,536	17,741	2.06
County Total	233,340	126,511	1.84

Source: ACS, 2019 (for housing estimates); Longitudinal Employer-Household Dynamics (LEHD) Survey, 2019 (for jobs estimates).

The cities of Clovis, Fowler, Fresno, Kerman, Kingsburg, Reedley, and Sanger and the unincorporated county all have higher ratios of lower-income jobs compared to affordable housing units than the upper limit of the ideal range of 1.3 to 1.6 jobs per housing unit. The Methodology supports an improved jobs-housing fit by directing more housing units overall and/or a greater share of low- and/or very low-income units to these jurisdictions, as summarized below:

» More RHNA units are allocated overall to three of the jurisdictions with the poorest existing jobs-housing fit—Clovis, Kerman, and Kingsburg—compared to their base allocations, which are derived from existing and projected population.

» A greater share of units in the very low-income tier than the Regional Determination is allocated to the cities of Clovis, Fowler, Kerman, Kingsburg, Reedley, and Sanger and to the unincorporated county.

» A greater share of units in the low-income tier than the Regional Determination is allocated to the cities of Clovis, Fowler, Fresno, and Kingsburg and the unincorporated county.

The Methodology does not result in a greater allocation of units overall *and* greater share of units in the low- and very low-income categories for *all* jurisdictions with identified jobs-housing fit imbalances because of conflicts between this objective and objectives 2 and 5, pertaining to promoting infill and agricultural preservation and affirmatively furthering fair housing.

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

The Methodology's Income-Shift approach to distributing housing units by income tier allocates a smaller proportion of housing units by income tier to jurisdictions whose existing share of units in that tier is larger than the Regional Determination's share. Similarly, the methodology allocates a larger proportion of units by income category to jurisdictions whose existing share of units in that income tier is smaller than the Regional Determination's share. As a result, all jurisdictions are assigned housing units by each income tier at levels that would move their share of units by income tier closer to the regional average once constructed.

Objective 5. *Affirmatively furthering fair housing.*

This Methodology supports the objective of affirmatively furthering fair housing by incorporating the TCAC Opportunity Score as a factor in its RHNA allocation methodology. Jurisdictions with a higher average TCAC score are allocated more low- and very low-income RHNA units because these are areas considered more amenity rich and with higher opportunity overall for low-income residents.

Furthermore, the Methodology results in 18% of low- and very low-income housing units allocated to the City of Clovis, which offers the greatest opportunity in the Fresno COG region compared to any other jurisdiction by a significant margin, as defined by the HCD/TCAC Opportunity Maps. Clovis is one of five jurisdictions in the county to achieve a positive TCAC score (0.59) when the TCAC Opportunity Map scores for census block groups and tracts are averaged for each jurisdiction. Other positive average TCAC scores range between 0.04 and 0.18. All other jurisdictions scored at or below zero. Thus, the placement of a preponderance of units in the City of Clovis is a strong step toward affirmatively furthering fair housing in the Fresno COG region. **Table 9** shows the average TCAC scores alongside the normalized TCAC factor score (also shown in **Table 2**).

TABLE 9   TCAC OPPORTUNITY SCORE AVERAGE BY JURISDICTION

Jurisdiction	Average TCAC Score	TCAC Normalized Score
Clovis	0.59	1.50
Coalinga	-0.14	0.68
Firebaugh	-0.19	0.62
Fowler	0.00	0.83
Fresno	-0.03	0.80
Huron	-0.29	0.50
Kerman	-0.02	0.81
Kingsburg	0.18	1.03
Mendota	-0.16	0.65
Orange Cove	0.04	0.88
Parlier	-0.24	0.57
Reedley	0.05	0.89
Sanger	-0.14	0.67
San Joaquin	0.00	0.84
Selma	-0.15	0.67
Unincorporated County	0.06	0.90

Source: California Tax Credit Allocation Committee, 2021 Opportunity Area Maps, 2021; PlaceWorks, 2021