



BAKERSFIELD

THE SOUND OF *Something Better*

June 1, 2022

TO: Mr. Ahron Hakimi, Executive Director
Kern Council of Governments
1401 19th St # 300
Bakersfield, CA 93301

RE: COMMENT ON THE 6TH CYCLE REGIONAL HOUSING NEEDS ALLOCATION AND METHODOLOGY

Director Hakimi,

Please accept the City of Bakersfield's comment on the Final Kern Council of Governments 6th Cycle Regional Housing Needs Allocation ("RHNA") Methodology 2023 – 2031 ("Methodology").

The City of Bakersfield acknowledges that it is the largest city and the metropolitan center for Kern County. While it is reasonable to focus housing development in incorporated areas and urban areas, the RHNA Methodology places a significant burden on the City of Bakersfield. We are concerned about the City's ability to meet these established RHNA goals and any potential future State actions related to compliance with RHNA allocations. Although the City of Bakersfield is committed to developing additional housing units and affordable housing units, we are noting for the record how challenging it will be to reach these allocations.

In addition, while the City of Bakersfield acknowledges the value of densifying the urban core, including a higher percentage of RHNA allocations, we would note the degree to which the allocations are disproportionate in comparison to other areas of the County. The Methodology assigns 76% of the total Kern County Lower Income RHNA Allocation to the City of Bakersfield. Of the overall total of 23,968 lower income units, 18,211 units are assigned to Bakersfield. Regardless of any method employed, the assignment of more than three out of every four lower income units to an area (151 sq. mi.) that is less than 2% of the whole of Kern County (8,163 sq. mi.) places a significant burden on one city and area, and ignores the housing needs of the remaining 98.2% of the county.

Per the State of California Department of Housing and Community Development ("HCD"), the duty to affirmatively further fair housing ("AFFH") extends to all of a public agency's activities and programs relating to housing and community development, including the development and implementation of its housing element. Pursuant to Government Code section 8899.50, "affirmatively furthering fair housing" means taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics. Note that HCD requires all municipalities take meaningful actions. It would appear that KernCOG's Methodology relies solely on the efforts of only one municipality, Bakersfield, in meeting AFFH obligations.

As an example, note the significant reduction in RHNA assigned to the County of Kern in comparison to the adopted 5th Cycle RHNA. Where the county's total RHNA allocation in the 5th Cycle was 21,583 units, the current 6th Cycle allocation is only 9,243, a reduction of 57%. Of the total RHNA allocation, 73% of that total is assigned to higher income brackets, with an allocation of only 2,539 units to lower income housing units in all of the unincorporated areas of the county. There is cause for concern in establishing an uneven methodology with outcomes that may be inconsistent with the goals of the State of California to help alleviate the state's housing crisis. The City of Bakersfield will look to future RHNA allocations to include more affordable housing in the growing and developing communities within Kern County. More importantly, the City will look for the support of Kern COG and the County of Kern in our efforts to annex unincorporated areas within the metropolitan area. These unincorporated pockets, many of which are largely or partially developed would be well-served to be part of a consistent urban community fabric which can be further developed in a pattern that would help meet the RHNA allocations.

The City of Bakersfield is the largest city in Kern County, accounting for 44% of the county's total population. Yet the 6th Cycle RHNA proposes assigning 65% of all housing types, and a staggering 76% of lower income housing units, to the City of Bakersfield. The City of Bakersfield again notes concern with our ability to meet these allocations and would comment on the lack of apportionment across the county. Future RHNA allocations should have an eye toward providing opportunities for affirmatively furthering fair housing throughout the county. At this time, the City is taking all administrative measures available to express concern on how disproportionately impacted the City of Bakersfield will be in providing low income housing units of this magnitude.

Respectfully



Christopher Boyle
Development Services Director

CC: Christian Clegg, City Manager
Gary Hallen, Assistant City manager
Paul Johnson, Planning Director
Virginia Gennaro, City Attorney

From: [Evelyn Murillo](#)
To: [Rochelle Invina-Jayasiri](#)
Cc: [Scott Hurlbert](#); [Keri Cobb](#); [Maria Lara](#)
Subject: RE: Issuance of Draft 6th Cycle RHNA share - Comments due no later than June 6, 2022 --Table Format Change Requested by HCD
Date: Monday, June 6, 2022 4:33:17 PM
Attachments: [image002.png](#)

Hi Rochelle,

Given our social economics demographics, we believe the numbers for 'Moderate Income Units (242)' should be reversed with the numbers for 'Above- Moderate Income Units (635)'. Please see snip below. Let us know if you have questions are any further information.

2023-2031 Draft RHNA Detailed Housing Unit Need Allocation							
Table A1 Draft Kern RHNA Housing Unit Determination by Detailed Income Categories							
Jurisdiction	Total RHNA Allocation	Very-Low Income Units	Low Income Units	Lower Income (Very Low & Low Income)	Moderate Income Units	Above-Moderate Income Units	Higher Income (Moderate & Above Moderate Income)
Arvin	1,174	124	79	203	268	703	971
Bakersfield	37,461	11,129	7,082	18,211	5,317	13,933	19,250
California City	427	39	25	64	101	263	364
Delano	1,866	324	206	530	369	967	1,336
Maricopa	13	1	1	2	3	8	11
McFarland	244	50	32	81	45	117	162
Ridgecrest	1,436	379	241	620	225	591	816
Shafter	3,294	678	431	1,110	603	1,581	2,185
Taft	504	68	43	112	108	284	393
Tehachapi	902	188	119	307	164	431	595
Wasco	1,086	127	81	209	242	635	877
Unincorporated County Areas	9,243	1,551	987	2,539	1,852	4,852	6,704
Total Kern County	57,650	14,658	9,328	23,986	9,299	24,365	33,664

Respectfully,

Evelyn Murillo
 Assistant Planner
 Community Development Department
[City of Wasco](#) | 764 E Street, Wasco CA 93280
 P: (661) 758-7200 | F: (661) 758-7239



Please note that email correspondence with the City of Wasco, along with attachments, may be subject to the California Public Records Act, and therefore may be subject to disclosure unless otherwise exempt.

From: Rochelle Invina-Jayasiri <RInvina@kerncog.org>
Sent: Tuesday, May 31, 2022 12:06 PM
To: Evelyn Murillo <evmurillo@cityofwasco.org>
Cc: Scott Hurlbert <schurlbert@cityofwasco.org>; Keri Cobb <kecobb@cityofwasco.org>
Subject: FW: Issuance of Draft 6th Cycle RHNA share - Comments due no later than June 6, 2022 --Table Format Change Requested by HCD