

BEFORE KERN COUNCIL OF GOVERNMENTS  
STATE OF CALIFORNIA, COUNTY OF KERN

RESOLUTION NO. 22-16

In the matter of:

ADOPTION OF THE KERN COG 6TH CYCLE REGIONAL HOUSING NEEDS ALLOCATION  
METHODOLOGY (2023-2031)

---

WHEREAS, Kern Council of Governments (Kern COG) is a regional transportation planning agency and a metropolitan planning organization (MPO); and

WHEREAS, California state housing element law requires Kern COG adopt a methodology for distributing the existing and projected regional housing need to each of the local jurisdictions within the Kern COG region; and

WHEREAS, the California Department of Housing and Community Development (HCD) is required to consult with Kern COG in determining the existing and projected housing need for the region prior to each housing element cycle; and

WHEREAS, on August 31, 2021, HCD provided Kern COG with a regional housing need of 57,650 units distributed among four income categories, very-low (25.4%), low (16.2%), moderate (16.1%), and above-moderate (42.3%) for the 6th Housing Element Cycle (2023-2031); and

WHEREAS, Kern COG conducted a public hearing on November 18, 2021 to formally receive verbal and written comments on the proposed Regional Housing Needs Allocation methodology, in addition to two public roundtable stakeholder meetings conducted in August and November 2021, community stakeholder survey, and four publicly-accessible Regional Planning Advisory Committee (RPAC) meetings, four publicly accessible Transportation Planning and Policy Committee (TPPC) meetings discussing methodology development, 30-day public comment period; and

WHEREAS, after considering the public comments and the RPAC and TPPC recommendation, on December 17, 2021, Kern COG submitted the draft RHNA methodology for the 6th Housing Element Cycle to HCD for a 60-day review; and

WHEREAS, on February 14, 2022, HCD determined the draft RHNA methodology furthers the objectives set forth in state law, California Government Code Section 65584(d).

NOW, THEREFORE, BE IT RESOLVED THAT:

Kern Council of Governments adopts the final RHNA Methodology for the 6th Housing Element Cycle (2023-2031) attached hereto as "Attachment 1" and incorporated herein by this reference and authorizes the Chair and the Executive Director to sign the Resolution No. 22-16

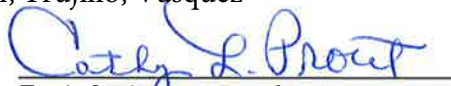
AUTHORIZED AND SIGNED THIS 17th DAY OF MARCH 2022

AYES: Blades, Crump, Kersey, Krier, Navarro, Lessenevitch, Prout, Reyna, P. Smith

NOES: None

ABSTAIN: None

ABSENT: Couch, Tafoya, Parra, Scrivner, B. Smith, Trujillo, Vasquez

  
Zack Scrivner, Vice Chairman  
Kern Council of Governments

# Final Kern Council of Governments 6th Cycle Regional Housing Needs Allocation Methodology 2023-2031

*Adopted on: March 17, 2022*

*Prepared by:*

Center for Business and Policy Research  
University of the Pacific  
Stockton and Sacramento, California



*Prepared for:*

Kern Council of Governments  
Bakersfield, California



# ERRATUM

---

## Kern Council of Governments Draft Methodology Framework Description: 2023-2031 Regional Housing Needs Allocation – Cycle 6

9 November 2021

*Prepared for:* Kern Council of Governments. Bakersfield, California

*As per an approved motion by Regional Planning Advisory Committee Member Oviatt, the first paragraph of the methodology description on page 5 has been revised to read:*

Kern COG, with input from elected officials, local staff, and stakeholders, must develop a methodology that quantifies and distributes the number of housing units assigned to each local government to meet the total regional housing need. The allocation must meet statutory objectives identified in California Housing Element Law (Government Code §§ 65580-65589.11) and be consistent with the forecasted development pattern from the Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS) (e.g., see Government Code § 65584.04(m)). The RHNA methodology allows for some discretion; however, state law, such as in Government Code § 65584(d) and Government Code §65584.04(e), requires Kern COG to further a series of objectives and to consider and include several additional factors to the extent that sufficient data is available. Of particular relevance to Kern County (and to many jurisdictions throughout California), Section 65584.04(e)(2)(A) calls on the Methodology to consider the following, to the extent sufficient data is available from local governments:

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 the necessary infrastructure for additional development during the planning period.

Although sufficient data was unavailable for inclusion as an expressed factor in the Methodology for a variety of reasons, including due to the uncertainty of water sources and uses, as well as the impact, extent, and efficacy of related plans and policies in the future, it is important to note this potentially significant challenge to meeting regional housing needs. In 2014 the State legislature passed a statewide framework to help protect groundwater resources over the long-term called the Sustainable Groundwater Management Act (SGMA). SGMA is comprised of a three-bill legislative package, including AB 1739 (Dickinson), SB 1168 (Pavley) and SB 1319 (Pavley) and subsequent statewide Regulations. SGMA requires local agencies to form groundwater sustainability agencies (GSAs) for the high and medium priority basins that have been found to be in overdraft through over use and pumping of groundwater. GSAs develop and implement groundwater sustainability plans (GSPs) to avoid undesirable results and mitigate overdraft within 20 years. With the exception of one area of unincorporated Kern County in the desert area of unincorporated Mojave and the City of California City (Fremont Basin) all basins throughout the county have either been declared in severe overdraft or adjudicated by the courts to limit use of groundwater. No exception for residential uses is included in any of these court ordered regulations or in the SGMA legislation. As SGMA does not change legal water rights, agricultural users are not required to transfer water to municipal or industrial use for residential construction. As the California Supreme Court decision in *Vineyards Area Citizens for Responsible vs City of Rancho Cordova* (S132972) established, groundwater is the only guaranteed source of water supply that can be used as a basis for a CEQA finding. Other sources of water, such as State Water Project allocations, can be reduced to zero deliveries, as they have in recent years, and therefore, cannot be relied upon for land use decisions for development. These legal and regulatory constraints combined with the current on-going drought could result in an inability to obtain a water supply for implementation of the allocated units.

In addition to the factors specifically listed in Government Code § 65584.04(e), Government Code § 65584.04(e)((13) also allows for the consideration of any other factors if 1) Kern COG specifies which objective(s) from 65584(d) each additional factor is necessary to further or 2) none of the factors undermine the objectives in 65584(d), the factors are applied equally across all income levels, and Kern COG makes a finding that any factors not already listed in 65584.04(e) are necessary to address significant health and safety conditions. This draft Methodology Framework Report develops that RHNA methodology, presenting a Draft RHNA Methodology for RHNA Cycle 6 that addresses the statutory objectives.

## Table of Contents

---

Table of Contents.....	2
List of Tables.....	2
Glossary of Acronyms.....	3
Introduction.....	4
Overview.....	4
Implications of RHNA for Local Governments.....	4
RHNA Objectives.....	5
Base RHNA Calculation.....	6
Lower Income Housing Units Adjustment Factors.....	9
Adjustment Factor One: Jobs-Housing Fit Factor.....	9
Adjustment Factor Two: Affirmatively Furthering Fair Housing Factor.....	10
Application of the Adjustment Factors.....	11
Draft Factor Adjusted RHNA Determination.....	12
Appendix: Alternative Base Jurisdictional Allocations.....	16

## List of Tables

---

Table 1 Final HCD RHNA Determination for Kern COG.....	4
Table 2 Total RHNA Allocation by Jurisdiction 2023-2031.....	6
Table 3 Calculation of Equity Adjusted Household Income Shares.....	7
Table 4 Initial RHNA Allocation by Jurisdiction and Calibration to Final HCD RHNA Determination.....	8
Table 5 Final RHNA Housing Unit Determination Calibrated to Jurisdictional Household Income Levels.....	8
Table 6 RHNA Objectives and Allocation Adjustment Factors.....	9
Table 7 Jobs-Housing Fit Factor Jurisdictional Variance.....	10
Table 8 Affirmatively Furthering Fair Housing Factor Jurisdictional Variance.....	11
Table 9 Jurisdictions’ Lower Income Factor Adjustment Allocations.....	11
Table 10 Factor Adjusted Allocations Calibrated to Final HCD RHNA Determination.....	12
Table 11 Draft Factor Adjusted RHNA Housing Unit Determination.....	13
Table 12 Comparison of Existing Household Shares with Factor Adjusted Housing Unit Shares.....	13
Table 13 Draft Adjusted RHNA Housing Unit Determination and Vacant Land Capacity for Housing Units.....	15
Table 14 Alternative Base Jurisdictional Allocations from RTP/SCS Forecast.....	16

## Glossary of Acronyms

---

ACS	American Community Survey
AFFH	Affirmatively Furthering Fair Housing
CHAS	Comprehensive Housing Affordability Strategy
COG	Council of Governments
GIS	Geographic Information System
HAMFI	HUD Area Median Family Income
HCD	California Department of Housing and Community Development
HUD	U.S. Department of Housing and Urban Development
RHNA	Regional Housing Needs Allocation
RHNA Plan	Regional Housing Needs Allocation Plan
TCAC	California Tax Credit Allocation Committee

# Introduction

## Overview

The Regional Housing Needs Allocation (RHNA) is a state-required process that seeks to ensure cities and counties are planning for enough housing to accommodate all economic segments of the community. The process is split into three steps:

1. **Regional Determination:** The State Department of Housing and Community Development (HCD) provides each region a Regional Determination of housing need, which includes a total number of units split into four income categories. Kern COG received its Final Regional Determination for Cycle 6 RHNA (2023-2031) in August of 2021.
2. **RHNA Methodology:** Councils of Governments are responsible for developing a RHNA methodology for allocating the Regional Determination to each jurisdiction in the region. This methodology must further a series of State objectives.
3. **Housing Element Updates:** Each jurisdiction must then adopt a housing element that demonstrates, among other things, how the jurisdiction can accommodate its assigned RHNA number through its zoning. The state reviews each jurisdiction’s housing element for compliance.

This document describes a Draft Methodology Framework for Kern County’s 2023-2031 RHNA Cycle 6. The Kern COG Final Regional Determination for Cycle 6 RHNA (2023-2031) is 57,650 units. That final RHNA Determination was received on August 31, 2021, and includes adjustments for vacancy, replacement, overcrowding, and cost burden as required by state law. In development of this Draft Methodology Framework, efforts on other Cycle 6 Methodologies were reviewed and incorporated as their demonstration of best practices warranted. To these ends, particular focus was given to the Cycle 6 RHNA Methodology used by the Sacramento Area Council of Governments (SACOG) and that under development by Fresno COG.

## Implications of RHNA for Local Governments

California requires that all local governments (cities and counties) adequately plan to meet the housing needs of everyone in the community. The RHNA quantifies the need for housing at all income levels and informs local land use planning in addressing existing and future housing needs resulting from population, employment, and household growth. As such, in addition to the total overall housing need number of 57,650 units, the Final RHNA Determination includes units required to meet housing needs across four income categories which are defined in terms of area median household income (AMHI). These housing needs by income level are reported in Table 1.

**Table 1 Final HCD RHNA Determination for Kern COG**

<b>Income Category</b>	<b>Income Limits</b>	<b>Percent</b>	<b>Housing Unit Need</b>	<b>Broad Income Category</b>	<b>Income Limits</b>	<b>Percent</b>	<b>Housing Unit Need</b>
Very Low	<50% AMHI	25.4%	14,658	Lower Income	<80% AMHI	41.6%	23,986
Low	50%-80% AMHI	16.2%	9,328				
Moderate	80%-120% AMHI	16.1%	9,299	Higher Income	>80% AMHI	58.4%	33,664
Above Moderate	>120% AMHI	42.3%	24,365				
<b>Total</b>		<b>100.0%</b>	<b>57,650</b>			<b>100.0%</b>	<b>57,650</b>

Kern COG, with input from elected officials, local staff, and stakeholders, must develop a methodology that quantifies and distributes the number of housing units assigned to each local government to meet the total regional housing need. The allocation must meet statutory objectives identified in California Housing Element Law (Government Code §§ 65580-65589.11) and be consistent with the forecasted development pattern from the Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS) (e.g., see Government Code § 65584.04(m)). The RHNA methodology allows for some discretion; however, state law, such as in Government Code § 65584(d) and Government Code §65584.04(e), requires Kern COG to further a series of objectives and to consider and include several additional factors to the extent that sufficient data is available and so long as either the factor is specifically listed in 65584.04(e) or 1) Kern COG specifies which objective(s) from 65584(d) each additional factor is necessary to further or 2) none of the factors undermine the objectives in 65584(d), the factors are applied equally across all income levels, and Kern COG makes a finding that any factors not already listed in 65584.04(e) are necessary to address significant health and safety conditions. This draft Methodology Framework Report develops that RHNA methodology, presenting a Draft RHNA Methodology for RHNA Cycle 6 that addresses the statutory objectives while considering the other factors as well.

Following the development and adoption of the RHNA methodology, the Regional Housing Needs Allocation Plan (RHNA Plan) formalizes the RHNA process into a planning document, establishing the total number of housing units that each city and county must plan for within the eight-year planning period. California Housing Element Law requires local governments to adopt plans and regulatory systems that provide opportunities for, and do not unduly constrain, housing development. Following the adoption of the RHNA Plan, each local jurisdiction must then update the housing element of its general plan to demonstrate how zoning will accommodate its share of RHNA (e.g., see Government Code § 65583(a)(3)).

If a jurisdiction does not take actions consistent with its adopted housing element, HCD may revoke housing element compliance (e.g., see Government Code § 65585(i)(1)(B)). If noncompliance is determined a range of penalties and consequences are possible. These include finding, because of its noncompliant housing element, that the jurisdiction's General Plan is inadequate and is therefore invalid, in which case the jurisdiction can no longer make permitting decisions. Jurisdictions with noncompliant housing elements are also vulnerable to litigation from housing rights' organizations, developers, and HCD, which may lead to mandatory compliance orders, suspension of local building control, and court approval of housing developments.

## RHNA Objectives

State statute requires Kern COG to demonstrate how its methodology "furthers" the five RHNA objectives shown below. This not only requires consistency, but proactive inclusion of each objective into the methodology. Each objective in Government Code § 65584(d) is described below.<sup>1</sup>

### OBJECTIVE 1. INCREASE HOUSING SUPPLY AND MIX OF HOUSING TYPES

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.

---

<sup>1</sup> Descriptions are taken from:

[https://leginfo.ca.gov/faces/codes\\_displaySection.xhtml?sectionNum=65584.&lawCode=GOV](https://leginfo.ca.gov/faces/codes_displaySection.xhtml?sectionNum=65584.&lawCode=GOV) accessed on 8/31/2021.



## OBJECTIVE 2. PROMOTE INFILL, EQUITY, AND ENVIRONMENT

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.

## OBJECTIVE 3. ENSURE JOBS HOUSING BALANCE AND FIT

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.

## OBJECTIVE 4. PROMOTE REGIONAL INCOME PARITY

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.

## OBJECTIVE 5. AFFIRMATIVELY FURTHER FAIR HOUSING

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. Specifically, affirmatively furthering fair housing means taking meaningful actions that, taken together, address significant disparities in housing needs and in access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws.

## Base RHNA Calculation

---

The first step in the RHNA methodology is to determine each jurisdiction’s total RHNA before it is divided by income categories. The Draft RHNA Methodology determines each jurisdiction’s total RHNA number by multiplying the HCD RHNA Determination by the proportion of household growth attributed to a jurisdiction in the forecast for the RTP/SCS between 2023 and 2031.

**Table 2 Total RHNA Allocation by Jurisdiction 2023-2031**

Jurisdiction	A	B	C
	Household Growth (2023-2031)	Share of Growth	Base RHNA Allocation
Arvin	398	2.04%	1,174
Bakersfield	12,713	64.98%	37,461
California City	145	0.74%	427
Delano	633	3.24%	1,866
Maricopa	4	0.02%	13
McFarland	83	0.42%	244
Ridgecrest	487	2.49%	1,436
Shafter	1,118	5.71%	3,294
Taft	171	0.88%	504
Tehachapi	306	1.56%	902
Wasco	369	1.88%	1,086
Unincorporated	3,137	16.03%	9,243
Total Kern County	19,564	100%	57,650

Table 2 reports the results of this process for Kern County. In Column A each jurisdiction’s household growth during Kern County’s 6<sup>th</sup> RHNA Cycle (2023-2031) is reported based on the RTP/SCS forecast.<sup>2</sup> The associated jurisdictional shares (Column B) are then multiplied by the County’s total housing unit need, 57,650, to get the base total RHNA determination by jurisdiction in Column C.

The second step determines the jurisdictional allocations by income category based on the existing distribution of household income and an Income Equity Adjustment Factor. The Income Equity Adjustment Factor directly furthers the first and fourth RHNA objectives by promoting a mixture of housing types, tenure, and affordability as well as regional balance across household income distributions. It does this by applying the adjustment factor to the difference between each jurisdiction’s household income distribution and the income distribution for the entire county.

Table 3 illustrates how this process is applied in Kern County. In Columns A and B, the jurisdictions’ existing share of lower income and higher income households are reported.<sup>3</sup> The difference between the regional share of lower income households (43%) and the jurisdiction’s existing share of lower income households (Column A) is then calculated in Column C. Similarly, the difference between the regional share of higher income households (57%) and the jurisdiction’s existing share of higher income households (Column B) is calculated in Column D. Those differences are then multiplied by the Income Equity Adjustment Factor (Column E), 150%, and then added to the existing proportions to get the equity adjusted shares of lower income (Column F) and higher income (Column G) households.

**Table 3 Calculation of Equity Adjusted Household Income Shares**

Jurisdiction	A	B	C	D	E	F	G
	Existing Lower HH (%)	Existing Higher HH (%)	Regional Lower HH Share (43%) less Jurisdiction	Regional Higher HH Share (57%) less Jurisdiction	Income Equity Adjustment Factor	Equity Adj. Lower HH (%)	Equity Adj. Higher HH (%)
Arvin	65%	35%	-23%	23%	150%	32%	68%
Bakersfield	36%	64%	7%	-7%		46%	54%
California City	48%	52%	-6%	6%		40%	60%
Delano	57%	43%	-14%	14%		36%	64%
Maricopa	61%	39%	-18%	18%		34%	66%
McFarland	69%	31%	-26%	26%		30%	70%
Ridgecrest	35%	65%	8%	-8%		47%	53%
Shafter	56%	44%	-13%	13%		36%	64%
Taft	45%	55%	-3%	3%		42%	58%
Tehachapi	42%	58%	1%	-1%		43%	57%
Wasco	60%	40%	-17%	17%		34%	66%
Unincorporated	47%	53%	-4%	4%		41%	59%
Kern County	43%	57%	0%	0%		43%	57%

When multiplied by the jurisdictions’ total RHNA allocations, these equity adjusted household shares give jurisdictions with a relatively high share of households in an income category a smaller allocation of housing units in that category and gives jurisdictions with low shares of households in an income category larger allocations of housing units in that category. It thereby directly balances disproportionate household income distributions and promotes a mixture of housing types.

<sup>2</sup> This report uses the Kern County RTP/SCS Forecast dated 10/13/2021 for these estimates.

<sup>3</sup> In this report, the percentage of lower income households is based on the number of households with median family income reported as 80% or less HUD Area Median Family Income (HAMFI) by jurisdiction in the U.S. Department of Housing and Urban Development’s Comprehensive Housing Affordability Strategy (CHAS) data from the 2013-2017 American Community Survey 5-year average estimates.

Table 4 details the process of how these elements are applied to estimate the initial housing unit allocation by income category for Kern County. In Column A the jurisdictions' Base RHNA Allocation is multiplied by their Equity Adjusted Lower Income Household share to get a base lower income RHNA determination in Column C. However, because of adjustments to the allocations, the sum of lower income RHNA housing units in Column C, 25,304, is more than the 23,986 lower income housing units in the Final HCD RHNA Determination for Kern County. Therefore, that difference of -5.21% at the County level (Column D) is applied to each jurisdiction's base lower income RHNA determination (Column D) to get in Column E the initial lower income housing unit allocation by jurisdiction calibrated to the Final HCD RHNA Determination for Kern County. The share of higher income households (Column F) is then estimated by subtracting the Initial Lower Income allocation (Column E) from the Total Base RHNA (Column A).

**Table 4 Initial RHNA Allocation by Jurisdiction and Calibration to Final HCD RHNA Determination**

Jurisdiction	A	B	C	D	E	F
	Base RHNA Allocation	Equity Adj. Lower HH (%)	Lower RHNA	% Adj Lower RHNA	Initial Lower RHNA	Initial Higher RHNA
Arvin	1,174	32%	371	-5.21%	352	822
Bakersfield	37,461	46%	17,376	-5.21%	16,471	20,990
California City	427	40%	172	-5.21%	163	265
Delano	1,866	36%	667	-5.21%	632	1,233
Maricopa	13	34%	4	-5.21%	4	9
McFarland	244	30%	72	-5.21%	69	175
Ridgecrest	1,436	47%	673	-5.21%	638	798
Shafter	3,294	36%	1,200	-5.21%	1,137	2,157
Taft	504	42%	210	-5.21%	199	305
Tehachapi	902	43%	390	-5.21%	369	533
Wasco	1,086	34%	373	-5.21%	354	732
Unincorporated	9,243	41%	3,797	-5.21%	3,599	5,643
Kern County	57,650	43%	25,304	-5.21%	23,986	33,664

Table 5 presents the draft jurisdictional allocations aligned to the Adjusted RHNA Housing Unit Determination by broad income level.

**Table 5 Final RHNA Housing Unit Determination Calibrated to Jurisdictional Household Income Levels**

Jurisdiction	A	B	C
	Lower Income (0-80%)	Higher Income (80+%)	Base RHNA Allocation
Arvin	352	822	1,174
Bakersfield	16,471	20,990	37,461
California City	163	265	427
Delano	632	1,233	1,866
Maricopa	4	9	13
McFarland	69	175	244
Ridgecrest	638	798	1,436
Shafter	1,137	2,157	3,294
Taft	199	305	504
Tehachapi	369	533	902
Wasco	354	732	1,086
Unincorporated	3,599	5,643	9,243
Kern County	23,986	33,664	57,650

Using the RTP/SCS forecast as the basis for total RHNA calculations ensures consistency between these two planning efforts. Since the RTP/SCS forecast is built from local plans, it incorporates a variety of regulatory, market, and performance factors. The RTP/SCS growth forecast has also been thoroughly vetted by local planning staff and represents a County-wide agreement on growth and its path to attaining climate and quality of life goals. While the RTP/SCS forecast of household growth during the 6<sup>th</sup> RHNA cycle from 2023-2031 has been used in this Draft RHNA Methodology, the RTP/SCS also generates county-wide and jurisdictional forecasts of population. A range of elements in RTP/SCS forecast could potentially be employed as the basis for the total RHNA calculations. These include using the jurisdictional composition of population/households in 2031 and using the shares of population/household growth rates through the RTP/SCS forecast period of 2046. Although the 2023-2031 RTP household growth shares have been selected, an overview of some of these additional RTP/SCS base allocations by jurisdiction of the RHNA Determination are presented in Table 14 in the Appendix.

## Lower Income Housing Units Adjustment Factors

The framework for the RHNA methodology is oriented around furthering each of the statutory RHNA objectives. In Table 6, the five RHNA objectives are listed by row and the adjustment factors used to further those objectives are listed by column. As described above, the First, Second and Fourth objectives are furthered through the total RHNA calculation relying on the development pattern in the RTP/SCS (step one) and the Income Equity Adjustment Factor (step two). However, additional adjustment factors are needed to further the Third and Fifth RHNA objectives. This section describes those factors.

**Table 6 RHNA Objectives and Allocation Adjustment Factors**

<i>RHNA Objectives (rows)/ RHNA Adjustment Factors (columns)</i>	Baseline RTP/SCS Forecast	Affirmatively Furthering Fair Housing Factor	Income Equity Adjustment Factor	Jobs-Housing Fit Factor
Increasing the housing supply and mix of housing types, tenure, and affordability	Furthers	Supports	Furthers	Supports
Promoting infill development and socioeconomic equity, protecting environmental and agricultural resources, and encouraging efficient development patterns	Furthers	Supports		Supports
Promoting an improved intraregional relationship between jobs and housing	Supports			Furthers
Balancing disproportionate household income distributions		Supports	Furthers	
Affirmatively furthering fair housing		Furthers	Supports	

### Adjustment Factor One: Jobs-Housing Fit Factor

This factor addresses the objective to improve the intraregional relationship between jobs and housing, including explicit consideration of the balance between the number of low-wage jobs and the number of units affordable to low-wage jobs in the jurisdiction. While the RTP/SCS addresses the overall jobs-housing balance, it does not separate the lower income work-housing balance issue. Therefore, this factor considers the existing ratio of low-wage workers to units affordable to low-wage workers. Jurisdictions with a higher-than-average ratio receive an upward adjustment of lower income RHNA units and those with a lower-than-average ratio receive a downward adjustment of lower income RHNA units.

Table 7 reports the jobs-housing fit adjustment factors by jurisdiction for Kern County. It uses the number of jobs by jurisdiction that pay \$3,333 per month or less as the measure of low-wage jobs in Column B.<sup>4</sup> Given that HCD considers households who spend more than 30% of their income on housing to be cost burdened, data on units for rent at less than \$1,000 a month (30% of \$3,333 income) are used to estimate the number of affordable housing units by jurisdiction in Column A.<sup>5</sup> The percentage difference between the overall county ratio of 2.32 and the jurisdictions' ratios (Column C) is then used to proportionally adjust the jurisdictions' allocated affordable housing units in Column D. Through this process jurisdictions with higher ratios of low-wage workers to affordable housing units are encouraged to zone for more affordable housing.

**Table 7 Jobs-Housing Fit Factor Jurisdictional Variance**

Jurisdiction	A	B	C	D
	Affordable Housing Units	Low-Wage Jobs	Jobs-Housing Fit Ratio	% Adjustment from County Ratio [2.32]
Arvin	1,789	2,592	1.45	-37.5%
Bakersfield	27,064	84,241	3.11	34.2%
California City	1,564	734	0.47	-79.8%
Delano	4,141	9,970	2.41	3.8%
Maricopa	171	90	0.53	-77.3%
McFarland	1,211	5,660	4.67	101.5%
Ridgecrest	2,961	4,396	1.48	-36.0%
Shafter	1,866	6,644	3.56	53.5%
Taft	1,263	1,732	1.37	-40.9%
Tehachapi	874	2,445	2.80	20.6%
Wasco	2,116	3,217	1.52	-34.5%
Unincorporated	30,796	54,155	1.76	-24.2%

### Adjustment Factor Two: Affirmatively Furthering Fair Housing Factor

This factor addresses the objective to take meaningful actions to address disparities in housing needs and in access to opportunity, such as employment, higher performing schools, health care, and transportation. Using the share of existing homes in higher opportunity areas, this factor seeks to open high opportunity jurisdictions to all economic segments of the community by giving jurisdictions with a higher-than-average share of high opportunity housing units an upward adjustment of lower income RHNA units and those with a lower-than-average share a downward adjustment of lower income RHNA units.

Table 8 reports the Affirmatively Furthering Fair Housing (AFFH) adjustment factors by jurisdiction for Kern County. It uses the number of housing units a jurisdiction has that are in higher opportunity areas (Column A) divided by total number of housing units in that jurisdiction (Column B) to estimate the share of higher opportunity areas (Column C).<sup>6</sup> The percentage difference between the overall county share of 31.1% higher opportunity units and the jurisdictions' shares are then used to proportionally adjust the jurisdictions' allocated affordable housing units in Column D.

<sup>4</sup> In this report, 2018 jobs by jurisdiction data are used from the U.S. Census Bureau's Longitudinal Employer-Household Dynamics (LEHD) program.

<sup>5</sup> In this report, Contract Rent reported by jurisdiction in the U.S. Census Bureau's American Community Survey Table# B25056, 2019 5-Year Estimates is used to estimate affordable housing units.

<sup>6</sup> In this report the census tracts identified as high and highest resource in the 2021 Statewide Summary Table of the TCAC/HCD Opportunity Area Maps are used to identify the higher opportunity areas by jurisdiction. The associated housing units in those census tracts are then estimated from the U.S. Census Bureau's American Community Survey Table# DP04, 2019 5-Year data.

Through this process jurisdictions with larger shares of higher opportunity housing units are asked to zone for more affordable housing. In so doing, this factor intends to open high opportunity jurisdictions to all economic segments.

**Table 8 Affirmatively Furthering Fair Housing Factor Jurisdictional Variance**

Jurisdiction	A	B	C	D
	Housing Units in High/Highest Resource Areas	Total Housing Units	Higher Opportunity Share	Adjustment from County Share [31.1%]
Arvin	0	5,130	0%	-31.1%
Bakersfield	60,872	124,478	48.9%	17.8%
California City	0	4,836	0%	-31.1%
Delano	2,293	12,518	18.3%	-12.8%
Maricopa	0	462	0%	-31.1%
McFarland	0	3367	0%	-31.1%
Ridgecrest	11,006	12,403	88.7%	57.6%
Shafter	0	5,383	0%	-31.1%
Taft	0	3,504	0%	-31.1%
Tehachapi	0	3,616	0%	-31.1%
Wasco	0	6,469	0%	-31.1%
Unincorporated	18,594	115,951	16.0%	-15.1%

### Application of the Adjustment Factors

The third step applies the two adjustment factors to each jurisdictions’ lower income units according to their respective factor weights and then uses the sum of those factors to increase or decrease the jurisdictions’ total lower income units. The lower income allocations from Column A of Table 5 are included in Column A of Table 9, and they are then adjusted by the factors. Each of the adjustment factors is weighted equally, so each gets one-half of the initial lower income housing unit allocation. The jurisdictions’ adjustments for each factor are then applied and the sum of these adjustments gives the Factor Adjusted Lower Income Housing Unit Allocation.

**Table 9 Jurisdictions’ Lower Income Factor Adjustment Allocations**

Jurisdiction	A	B	C	D	E	F	G	H
	Lower Income RHNA	Factor 1 Weight = 50%	Factor 1 % Adjusted	Factor 1 Jobs-Housing	Factor 2 Weight = 50%	Factor 2 % Adjusted	Factor 2 AFFH	Factor Adjusted Lower Income RHNA
Arvin	352	176	-38%	110	176	-31%	121	231
Bakersfield	16,471	8,235	34%	11,050	8,235	18%	9,700	20,750
California City	163	81	-80%	16	81	-31%	56	72
Delano	632	316	4%	328	316	-13%	276	604
Maricopa	4	2	-77%	1	2	-31%	1	2
McFarland	69	34	101%	69	34	-31%	24	93
Ridgecrest	638	319	-36%	204	319	58%	503	707
Shafter	1,137	569	53%	873	569	-31%	392	1,264
Taft	199	100	-41%	59	100	-31%	69	127
Tehachapi	369	185	21%	223	185	-31%	127	350
Wasco	354	177	-34%	116	177	-31%	122	238
Unincorporated	3,599	1,800	-24%	1,364	1,800	-15%	1,528	2,892
Kern County	23,986	11,993		14,412	11,993		12,918	27,330

*Note: Due to rounding, numbers presented in this table may not add up precisely to the totals provided.*

Table 9 details the factor adjustment process for Kern County. First, each factor’s weight is multiplied by the lower income housing unit allocation by jurisdiction (Column A). Doing this results in unadjusted factor weighted lower

income housing units in Columns B and E for both factors. Next, both factor adjustments are applied. The percentage adjustment from Factor One, the Jobs-Housing Fit Factor, from Column D of Table 7 is reported in Column C. The value in Column C is multiplied by the unadjusted factor weighted units from Column B and then added to Column B to get the factor adjusted jobs-housing fit lower income housing unit allocation in Column D. Next, the percentage adjustment from Factor Two, the Affirmatively Furthering Fair Housing (AFFH) Factor, from Column D of Table 8 is reported in Column F and multiplied by the unadjusted factor weighted units from Column E and then added to Column E to get the factor adjusted AFFH lower income housing unit allocation by jurisdiction in Column G. The sum of Column D and G then form a factor adjusted lower income housing unit allocation by jurisdiction in Column H.

## Draft Factor Adjusted RHNA Determination

The fourth and final step re-aligns the jurisdictional factor adjusted housing unit allocations to those specified in the Final RHNA Determination. If Kern County is to maintain the county-wide Draft RHNA Determination across each of the income categories, it is necessary to correct the factor adjusted housing units by income category. Like the calibration in Step Two, the percentage differences in the totals across the income levels are applied to each of the jurisdictional factor adjusted housing unit allocations to align the sum of the jurisdictional allocations to the Final Determination values.

**Table 10 Factor Adjusted Allocations Calibrated to Final HCD RHNA Determination**

	A	B	C	D	E
Jurisdiction	Factor Adjusted Lower Income RHNA	Lower Income RHNA % Adjustment	Calibrated Factor Adjusted Lower Income RHNA	Base Total RHNA Allocation	Calibrated Factor Adjusted Higher Income RHNA
Arvin	231	-12.24%	203	1,174	971
Bakersfield	20,750	-12.24%	18,211	37,461	19,250
California City	72	-12.24%	64	427	364
Delano	604	-12.24%	530	1,866	1,336
Maricopa	2	-12.24%	2	13	11
McFarland	93	-12.24%	81	244	162
Ridgecrest	707	-12.24%	620	1,436	816
Shafter	1,264	-12.24%	1,110	3,294	2,185
Taft	127	-12.24%	112	504	393
Tehachapi	350	-12.24%	307	902	595
Wasco	238	-12.24%	209	1,086	877
Unincorporated	2,892	-12.24%	2,539	9,243	6,704
Kern County	27,330	-12.24%	23,986	57,650	33,664

*Note: Due to rounding, numbers presented in this table may not add up precisely to the totals provided.*

Table 10 details this adjustment process. In Column A, the jurisdictions' factor adjusted lower income housing unit allocation from Column H of Table 9 is carried forward. Since the sum of lower income RHNA housing units in Column A, 27,330, is higher than the 23,986 in the Final HCD RHNA Determination for lower income housing units, it is necessary to adjust downward the allocations in Column A. Therefore, the percentage difference of -12.24% at the County level (Column B) is applied to each jurisdiction's factor adjusted lower income housing unit allocation (Column A) to get the factor adjusted lower income housing unit allocation by jurisdiction calibrated to the Final HCD RHNA Determination for Kern County in Column C. Given these adjustments, it is necessary to make complementary adjustments to the jurisdiction's higher income housing unit allocations. Those adjustments are made by subtracting



the calibrated factor adjusted lower income housing units (Column C) from the base total RHNA allocation (Column D), which results in calibrated factor adjusted higher income housing units in Column E.

**Table 11 Draft Factor Adjusted RHNA Housing Unit Determination**

Jurisdiction	Factor Adjusted Lower Income (0-80%)	Factor Adjusted Higher Income (80+%)	Base RHNA Allocation
Arvin	203	971	1,174
Bakersfield	18,211	19,250	37,461
California City	64	364	427
Delano	530	1,336	1,866
Maricopa	2	11	13
McFarland	81	162	244
Ridgecrest	620	816	1,436
Shafter	1,110	2,185	3,294
Taft	112	393	504
Tehachapi	307	595	902
Wasco	209	877	1,086
Unincorporated	2,539	6,704	9,243
<b>Kern County</b>	<b>23,986</b>	<b>33,664</b>	<b>57,650</b>

*Note: The Final RHNA Determination by income level and in total is reported in the Kern County row. Due to rounding, numbers presented in this table may not add up precisely to the totals provided.*

Table 11 reorganizes the data in Table 10 to summarize the Draft Factor Adjusted RHNA Housing Unit Determination by income level. Differences between the existing share of households by income and shares of factor adjusted RHNA unit allocations are reported in Table 12. It highlights the influence the Draft RHNA Methodology has in promoting transformative housing opportunities in Kern County.

**Table 12 Comparison of Existing Household Shares with Factor Adjusted Housing Unit Shares**

Jurisdiction	Lower Income (0-80%)			Higher Income (80+%)		
	Existing	Factor Adjusted	Difference	Baseline	Factor Adjusted	Difference
Arvin	65%	17%	-48%	35%	83%	48%
Bakersfield	36%	49%	13%	64%	51%	-13%
California City	48%	15%	-34%	52%	85%	34%
Delano	57%	28%	-29%	43%	72%	29%
Maricopa	61%	13%	-48%	39%	87%	48%
McFarland	69%	33%	-36%	31%	67%	36%
Ridgecrest	35%	43%	8%	65%	57%	-8%
Shafter	56%	34%	-22%	44%	66%	22%
Taft	45%	22%	-23%	55%	78%	23%
Tehachapi	42%	34%	-8%	58%	66%	8%
Wasco	60%	19%	-41%	40%	81%	41%
Unincorporated	47%	27%	-19%	53%	73%	19%
<b>Kern County</b>	<b>43%</b>	<b>42%</b>		<b>57%</b>	<b>58%</b>	

Context regarding existing residential unit capacity and the Draft Adjusted RHNA Housing Unit Determination is presented in Table 13. Following a summary of existing housing units by jurisdiction, Table 13 compares existing medium, high, and mixed-use density residential unit capacity to the lower income Draft Adjusted RHNA Housing Unit Determination. It then compares existing very low- and low-density residential unit capacity to the higher income Draft Adjusted RHNA Housing Unit Determination. The final two columns in Table 13 compare total existing



residential unit capacity to the total Draft Adjusted RHNA Housing Unit Determination for each jurisdiction. Those values illustrate that each jurisdiction in Kern County has enough existing residential unit capacity to meet their respective total Draft Adjusted RHNA Housing Unit Determination resulting from this Draft Methodology.

**Table 13 Draft Adjusted RHNA Housing Unit Determination and Vacant Land Capacity for Housing Units**

Jurisdiction	Existing Housing Units (2020)	Residential Unit Capacity (Vacant): Medium, High, and Mixed-Use Density	Lower Income Draft Factor Adjusted RHNA Allocation	Residential Unit Capacity (Vacant): Very Low and Low Density	Higher Income Draft Factor Adjusted RHNA Allocation	Total Residential Units Capacity (Vacant)	Total Draft Factor Adjusted RHNA Allocation = Base RHNA Allocation
Arvin	4,884	536	203	1,025	971	1,561	1,174
Bakersfield	132,697	27,524	18,211	64,870	19,250	92,394	37,461
California City	5,196	48,354	64	34,947	364	83,301	427
Delano	11,572	1,303	530	3,493	1,336	4,796	1,866
Maricopa	432	0	2	253	11	253	13
McFarland	3,412	82	81	449	162	531	244
Ridgecrest	12,359	1,784	620	3,543	816	5,328	1,436
Shafter	5,412	1,303	1,110	19,713	2,185	21,015	3,294
Taft	2,596	1,065	112	4,289	393	5,354	504
Tehachapi	3,784	460	307	2,305	595	2,765	902
Wasco	6,366	242	209	3,029	877	3,272	1,086
Unincorporated	112,299	229,230	2,539	147,711	6,704	376,940	9,243
<b>Kern County</b>	<b>301,009</b>	<b>311,883</b>	<b>23,968</b>	<b>285,627</b>	<b>33,664</b>	<b>597,511</b>	<b>57,650</b>

*Note: The residential unit capacity was estimated by Kern COG using a GIS analysis of each jurisdiction's latest general plan information (2020) outside urban/built-up areas and demonstrates sufficient existing capacity to accommodate a variety of density ranges to meet each jurisdiction's housing need.*

## Appendix: Alternative Base Jurisdictional Allocations

**Table 14 Alternative Base Jurisdictional Allocations from RTP/SCS Forecast**

Jurisdiction	Base Allocation 1: RTP/SCS Population Growth to RHNA (2023-31)	Base Allocation 2: RTP/SCS Population in 2031	Base Allocation 3: RTP/SCS Population Growth (2023-46)	Base Allocation 4: RTP/SCS Household Growth to RHNA (2023-31)	Base Allocation 5: RTP/SCS Households in 2031	Base Allocation 6: RTP/SCS Household Growth (2023-46)
Arvin	1,419	1,258	1,272	1,174	991	929
Bakersfield	35,923	26,807	39,191	37,461	27,170	38,631
California City	597	908	539	427	902	482
Delano	2,755	3,201	1,932	1,866	2,240	1,546
Maricopa	8	58	12	13	71	15
McFarland	221	818	629	244	647	581
Ridgecrest	1,224	1,708	1,485	1,436	2,216	1,743
Shafter	3,023	1,474	3,627	3,294	1,260	3,584
Taft	433	529	431	504	489	481
Tehachapi	885	828	813	902	738	838
Wasco	1,366	1,674	1,194	1,086	1,237	1,009
Unincorporated	9,797	18,389	6,526	9,243	19,690	7,811
<b>Total</b>	<b>57,650</b>					
<i>Note: Due to rounding, numbers presented in this table may not add up precisely to the totals provided.</i>						