

MEMORANDUM

DATE August 10, 2020

TO California Department of Housing and Community Development (HCD)

ATTN Megan Kirkeby, Acting Deputy Director, Housing Policy Development

CC Tom Brinkhuis, Housing Policy Specialist, HCD

FROM Chris Devine, Planning Manager, Butte County Association of Governments

SUBJECT BCAG Draft RHNP Methodology

Dear Ms. Kirkeby:

In accordance with California law, the Butte County Association of Governments (BCAG) has prepared a draft methodology for the 6th Cycle Regional Housing Needs Plan (RHNP). This draft methodology was developed in consultation with BCAG member jurisdictions and is informed by input from stakeholders, as detailed below:

- » The BCAG Planning Directors Group (PDG), composed of senior planning staff from all six member jurisdictions, has served as the technical advisory group to the 6th Cycle RHNP. The PDG has reviewed data and draft materials and provided critical input on the RHNP throughout its development.
- » The BCAG Board of Directors, composed of elected representatives from each member jurisdiction, has received regular updates on the RHNP process and provided input on the project at key milestones.
- » Pursuant to California Government Code, Section 65584.04(b)(1), member jurisdictions have been surveyed to support development of a methodology based on the factors required for inclusion in Government Code, Section 65584.04(e).
- » Pursuant to California Government Code, Section 65584.04(d), BCAG has engaged members of the public in the RHNP development process. The BCAG website provides up-to-date information on the RHNP and hosts materials for public review. On May 19, 2020, BCAG held an RHNP Stakeholder Workshop to inform and engage outside stakeholders in the RHNP development. At the direction of the Board of Directors, BCAG is seeking additional opportunities to engage and meet with stakeholders to foster a community-driven RHNP.

The draft 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 to preparing each.

JURISDICTIONAL ALLOCATION

The BCAG regional housing needs allocation (RHNA), established by the California Department of Housing and Community Development (HCD), is composed of a regular growth allocation (6,703 units) and a fire rebuild allocation (8,803 units), and totals 15,506 units.

- » This draft methodology applies five weighted factors to distribute the regular growth allocation across BCAG's six-member jurisdictions.

- » The fire rebuild allocation is separately assigned to the jurisdictions that lost units in the Camp Fire (the Town of Paradise and Unincorporated County) based on the total rebuild units assigned and each jurisdiction’s proportionate loss of units in the fire.

To distribute the regular growth allocation among the jurisdictions, the methodology starts with assigning a base allocation, which is the product of the jurisdictions’ forecasted share of regular growth in the 2018–2040 BCAG Growth Forecast and the regular growth allocation. The base allocation establishes a foundational allocation that recognizes the significant capacity differences between jurisdictions and provides for an allocation that is suitable for each jurisdiction’s existing size. For example, the most populous city in the region, Chico, has approximately 57 times more housing units than the least populous city, Biggs; while the 2018–2040 BCAG Growth Forecast attributes 45 percent of anticipated regional housing growth to Chico and only 1.3 percent to Biggs, these projections represent a local housing unit increase of 31.2 percent in Biggs and only 18.7 percent in Chico. The base allocation is shown in Table 1.

TABLE 1 BASE ALLOCATION

Jurisdiction	Jurisdictional Percent of Regional Growth in 2018-2040 Growth Forecast	Base Allocation
Biggs	1.3%	87
Chico	45.0%	3,016
Gridley	5.4%	362
Oroville	9.7%	650
Paradise	5.6%	376
County Unincorporated	33.0%	2,212
Total	100%	6,703

ALLOCATION FACTORS

Using the base allocation as a foundation, the draft methodology adjusts each jurisdiction’s regular growth allocation using a series of weighted factors, each of which is normalized on a scale of 0.5 to 1.5 to allow for ease of computation and comparison of factors among each other.

In preparation for choosing the allocation factors, BCAG collected and analyzed more than 20 data layers, including:

- » Jobs and jobs-housing balance
- » Opportunities and constraints to development in each jurisdiction
- » Preserved and protected land
- » Designated agricultural land
- » The distribution of household growth in the regional transportation plan (the base allocation)
- » Cost-burdened households
- » Overcrowding
- » Homelessness
- » Loss of housing units from the Camp Fire
- » Wildfire risk
- » Flood and erosion hazards
- » Protected and/or sensitive environmental lands

- » Vehicle miles traveled
- » Transit connectivity
- » Affordable housing stock
- » HCD/Tax Credit Allocation Committee (TCAC) Opportunity Maps
- » Childhood poverty status

After thoughtful consideration, BCAG proposes to use Transit Connectivity, Jobs, Wildfire Risk, Agriculture and Forest Land Preserves, and a combined HCD/TCAC Opportunity Maps, and Childhood Poverty Status measure of opportunity as the factors to adjust the base allocation. Each of these measures is shown in Table 2 and described in more detail herein.

TABLE 2 PROPOSED FACTORS AND SCALED SCORES

Jurisdiction	Transit Connectivity	Jobs	Wildfire Risk	Agriculture and Forest Land Preserves	HCD/TCAC Opportunity Map	Opportunity	
						Percent of Children Living Above the Poverty Level	Combined HCD/TCAC and Childhood Poverty
Biggs	0.57	0.50	1.50	1.43	0.86	0.83	0.78
Chico	1.50	1.50	1.48	1.24	1.50	1.21	1.50
Gridley	0.65	0.54	1.50	1.34	0.87	1.16	1.02
Oroville	1.07	0.76	1.46	1.32	0.79	0.50	0.50
Paradise	0.78	0.58	0.50	1.50	0.57	1.50	1.05
Unincorporated County	0.50	0.74	1.06	0.50	0.50	1.27	0.84

Transit Connectivity

Availability of transit service is a key consideration in siting housing since transit allows residents to access jobs and services without generating vehicle trips. The Transit Connectivity factor is based on the Transit Connectivity Score prepared by AllTransit for each incorporated jurisdiction and the County as a whole. The Transit Connectivity Score is a measure of how connected the average household member is to the availability of a transit ride and accessibility to jobs using transit. More information on the Transit Connectivity Score and how it is developed is available in the [AllTransit Methods](#) document. BCAG consultants used the incorporated jurisdictions’ and County-wide scores to derive a transit connectivity score for the unincorporated County.

Jobs

The availability of jobs in a given community is an important consideration in siting housing, since residents need access to jobs for economic reasons, and the proximity of jobs to residents minimizes travel time and vehicle miles traveled (VMT). Current regional job count data is sourced from the California Employment Development Department (EDD). We determined the distribution of jobs per jurisdiction using each jurisdiction’s proportion of regional jobs from the latest available (2017) Longitudinal Employer-Household Dynamics (LEHD) OnTheMap measures. Because this distribution predated the 2018 Camp Fire, we then adjusted jurisdictional jobs distribution to account for the fire impact and calculated the resulting Jobs Factor. A detailed fire-adjustment methodology is available upon request.

Wildfire Risk

The 2018 Camp Fire was the deadliest wildfire in the state’s history and destroyed more than 14,000 homes in Butte County. The Wildfire Risk Factor uses 2020 CalFire measures of high- and very high-wildfire risk and geographic information system (GIS) analysis to determine what percentage of each jurisdiction’s land is not at a high- or very high-risk of wildfire. The intent of this factor is to prioritize the construction of homes in jurisdictions with a lower risk of wildfire.

Agriculture and Forest Land Preserves

Agriculture is Butte County’s number one industry; in 2018, it produced more than \$680 million worth of farming products. The region has a deep commitment to protecting its agriculture lands. In addition, the region has two national forests preserved from development. We used GIS analysis to determine the percentage of land in each jurisdiction not designated for agriculture or preserved as part of a national forest. The resulting percentage of land available for development makes up the Agriculture and Forest Land Preserves Factor.

Opportunity

BCAG and member jurisdictions considered both HCD/TCAC Opportunity Maps and Percent of Children Living Above the Poverty Level as potential factors to support the equitable distribution of housing units.

- » The HCD/TCAC Opportunity Maps calculate opportunity scores at the census block group level 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.
- » The Percent of Children Living Above Poverty Level measure uses 2013–2018 American Community Survey data prepared by the U.S. Census Bureau. This measure was considered because it has been recognized as a strong indicator for evaluating the level of economic stability and opportunity for families with children in a population. In addition, childhood poverty status has implications for positive life outcomes, as recognized by the similar Students Living Above Poverty Level indicator in the HCD/TCAC Opportunity measure.

BCAG determined that a combination of these two indicators would be the best measure of economic opportunity, because neither of them seemed to represent conditions in Butte County on its own. For example, the Town of Paradise, which scored second lowest in the County using the TCAC/HCD measure, is generally recognized as offering greater opportunity than many other jurisdictions in the County; this fact is borne out by the Percent of Children Living Above Poverty. Ultimately, BCAG and its member jurisdictions agreed to add the normalized (0.5 to 1.5) scores of the two measures and re-normalize the sum to create a new, combined measure of opportunity. The combination addresses concentrations of poverty and maximizes access to opportunity, as measured by HCD/TCAC.

FACTOR WEIGHTING

Following selection of the factors, the draft methodology assigns weights to each. These weights establish what percentage of the total allocation will be distributed based on that factor. Each of the factors advance important priorities in the BCAG region and were therefore assigned an equal weight of 10 percent each so that 50 percent of the allocation is determined by the five factors. The remaining 50 percent of units are allocated in accordance with the Regional Growth Forecast and the base allocation. This supports consistency with the Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS) as well as member jurisdiction General Plans and favors a more balanced distribution of growth, rather than concentrating a vast majority in the City of Chico. All weights are summarized below.

- » Combined TCAC/HCD Opportunity and Childhood Poverty Status Factor: 10-percent weight
- » Transit Connectivity: 10-percent weight
- » Number of Jobs: 10-percent weight
- » Wildfire Risk: 10-percent weight
- » Agriculture and Forest Land Preserves: 10-percent weight
- » Base Allocation: 50-percent weight

Table 3 shows the resulting factor-adjusted allocations for each jurisdiction.

TABLE 3 BASE ALLOCATION AND FACTOR ADJUSTMENT

Jurisdiction	Base Allocation	Factor-Adjusted Allocation	Divergence
Biggs	87	81	(6)
Chico	3,016	3,488	472
Gridley	362	344	(17)
Oroville	650	625	(25)
Paradise	376	342	(34)
Unincorporated	2,212	1,823	(389)
Total	6,703	6,703	-

FIRE REBUILD ALLOCATION

Once the regular growth allocation has been distributed to each jurisdiction, the fire rebuild allocation is added to reach the total allocation for all jurisdictions. As described above, this step simply distributes the units explicitly assigned by HCD as fire rebuild units to the two jurisdictions that lost housing units in the Camp Fire, based on the total allocation and each jurisdiction’s proportion of total housing unit loss. Table 4 shows the combination of the factor-adjusted regular growth allocation with the fire rebuild allocation to create the cumulative total allocation.

TABLE 4 FIRE REBUILD AND FINAL ALLOCATION

Jurisdiction	Factor-Adjusted Allocation	Fire Allocation	Total Allocation
Biggs	81	-	81
Chico	3,488	-	3,488
Gridley	345	-	345
Oroville	625	-	625
Paradise	342	6,838	7,180
Unincorporated	1,823	1,965	3,788
Total	6,703	8,803	15,506

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 set, 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 BCAG regional income tier allocation from HCD is separated into two categories: regular growth and fire rebuild units, which are shown in Table 5.

TABLE 5 BCAG REGIONAL INCOME TIER ALLOCATION

Income Level	Regular Growth		Fire Rebuild		All Units Combined	
	Unit Percent	Unit Total	Unit Percent	Unit Total	Unit Percent	Unit Total
Very low	26%	1,768	3.53%	310	13.4%	2,078
Low	15%	977	3.53%	310	8.3%	1,287
Moderate	16%	1,068	24.33%	2,142	20.7%	3,210
Above Moderate	43%	2,890	68.62%	6,041	57.6%	8,931
Total	100%	6,703	100.00%	8,803	100%	15,506

REGULAR GROWTH INCOME DISTRIBUTION

BCAG proposes the following process to distribute the ‘regular growth’ units by income tier to each jurisdiction:

- » We start with the pre-fire income distribution for each jurisdiction estimated in the 2013–2018 American Communities Survey prepared by the U.S. Census Bureau.
- » For the municipalities, we then calculate the increase in units for each income tier needed to have each community match HCD’s assigned income tier allocation by the horizon year 2040. We then use these factors to adjust each municipality’s income distribution on a straight-line basis for the 8-year period of the RHNA.
 - As in the 5th Cycle, we propose not to engage in this process for the unincorporated County; foregoing this process for the County allows the County to generally maintain its current allocation among the income tiers and concentrates low- and very low-income housing in better resourced, incorporated jurisdictions.
 - Biggs already has more low-income housing units today than it would need to have in 2040 to match the HCD allocation. For that reason, Biggs’ low-income unit allocation is proposed to be set to zero.
- » The next step involves checking each jurisdictions’ combined allocation of low- and very low-income units to see if the combined percentage was greater than that assigned to it in the 5th Cycle. Because the 6th Cycle regular growth percent allocation of low- and very low-income units from HCD exceeds that of the 5th Cycle, it is not possible to maintain an absolute restriction on every jurisdiction’s allocation of low- and very low-income units, but we were able to do this for all jurisdictions other than Chico.
- » As a final step, we make adjustments to ensure that each jurisdiction’s sum allocation across income tiers equals the jurisdiction’s total regional allocation and that the county-wide allocation in each income tier is equal to the amount set by HCD.

The final proposed distribution of units across all income tiers is shown in Table 6. The full process can be viewed in an Excel spreadsheet being distributed with this memo.

TABLE 6 INCOME DISTRIBUTIONS BY JURISDICTION

Jurisdiction	Very Low		Low		Moderate		Above Moderate		Total Housing Units
	%	HU	%	HU	%	HU	%	HU	
City of Biggs	45.6%	37	0.0%	-	15.5%	13	38.9%	31	81
City of Chico	31.6%	1,101	14.5%	506	22.3%	776	31.7%	1,104	3,488
City of Gridley	34.4%	118	11.8%	41	9.0%	31	44.8%	154	344
City of Oroville	27.0%	169	0.7%	4	12.0%	75	60.3%	377	625
Town of Paradise	21.1%	72	18.7%	64	9.3%	32	50.9%	174	342
Unincorporated	14.8%	271	19.9%	362	7.8%	142	57.5%	1,049	1,823
County Total	26.4%	1,768	14.6%	977	15.9%	1,068	43.1%	2,890	6,703
HCD Requirement	26.4%	1,768	14.6%	977	15.9%	1,068	43.1%	2,890	6,703

FIRE REBUILD ALLOCATION INCOME DISTRIBUTION

The fire rebuild allocation by income tier set by HCD is based on actual unit loss. To distribute the fire rebuild units by income tier between the Town of Paradise and the County, BCAG proposes to assign a rebuild share proportionate with the actual loss of units in each jurisdiction by income tier. This distribution is shown in Table 7.

TABLE 7 FIRE REBUILD ALLOCATION INCOME DISTRIBUTION

Jurisdiction	Very Low		Low		Moderate		Above Moderate		Total Housing Units
	%	HU	%	HU	%	HU	%	HU	
Town of Paradise	3.5%	310	3.5%	310	14.6%	1,287	56.0%	4,930	6,838
Unincorporated	0.0%	-	0.0%	0	9.7%	855	12.6%	1,111	1,965
County Total	3.5%	310	3.5%	310	24.3%	2,141	68.6%	6,041	8,803

TOTAL ALLOCATION BY INCOME TIER

As a final step, the jurisdictional allocation by income tier for regular growth and fire rebuild are combined, yielding the total allocation for each jurisdiction in each income tier, shown in Table 8. The final row in Table 8 shows the overall HCD requirement for comparison.

TABLE 8 TOTAL ALLOCATION BY INCOME TIER

Jurisdiction	Very Low		Low		Moderate		Above Moderate		Total HU
	%	HU	%	HU	%	HU	%	HU	
City of Biggs	45.6%	37	0.0%	-	15.5%	13	38.9%	31	81
City of Chico	31.6%	1,101	14.5%	506	22.3%	776	31.7%	1,104	3,488
City of Gridley	34.4%	118	11.8%	41	9.0%	31	44.8%	154	344
City of Oroville	27.0%	169	0.7%	4	12.0%	75	60.3%	377	625
Town of Paradise	5.3%	382	5.2%	374	18.4%	1,319	71.1%	5,105	7,180
Unincorporated	7.1%	271	9.6%	362	26.3%	996	57.0%	2,159	3,788
County Total	13.4%	2,078	8.3%	1,287	20.7%	3,209	57.6%	8,931	15,506
Overall HCD Requirement	13.4%	2,078	8.3%	1,287	21.7%	3,210	57.6%	8,931	15,506

STATUTORY OBJECTIVES

Following state law, the draft 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 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.*

As described above, the methodology for allocating units in each income tier supports a redistribution of units, such that the jurisdictions that currently have a lesser share of low- and very-low income units receive a larger allocation.

The draft methodology allocates units in all four income tiers to each of the region’s six jurisdictions, with one exception. As noted above, the City of Biggs already accommodates a disproportionate share of the region’s existing low-income housing units, with more than 20 percent of the City’s existing units falling into this category. To further both Objectives 1 and 4, the City of Biggs was not assigned any additional low-income units (although it is assigned very low-income units).

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 draft methodology places the preponderance of units in incorporated, urbanized municipalities so as to support infill and socioeconomic equity. Moreover, two of the factors used in the draft methodology prioritize transit connectivity and proximity to jobs to encourage efficient development patterns and support efforts to minimize VMT and greenhouse gas (GHG) emissions. The draft methodology’s incorporation of the Growth Forecast used in the Regional Transportation Plan, further supports consistency of the draft methodology with planning efforts to achieve regional GHG emission reduction targets. Additionally, the Agriculture and Forest Land Preserves factor prioritizes locating housing in areas not preserved or dedicated to agricultural uses.

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 jobs and housing is between 1.3 and 1.6 jobs for every one housing unit. No jurisdiction in the BCAG region has achieved this balance; two jurisdictions (Paradise and Oroville) have an excess of jobs, all others have an oversupply of housing units compared to jobs, as depicted in Table 9.

Table 9 Jobs-Housing Balance

Jurisdiction	Total Jobs	Total Housing Units	Jobs-Housing Balance
Biggs	237	696	0.34
Chico	49,238	41,738	1.18
Gridley	2,252	2,540	0.89
Oroville	12,879	7,391	1.74
Paradise	4,226	1,766	2.39
County Unincorporated	11,869	31,991	0.37

The jobs-housing fit, or relationship of low-wage jobs to very low- and low-income households, shows similar but slightly different results. Looking only at existing low- and very-low income households and low-wage jobs located in the jurisdictions, Oroville (2.24 low-wage jobs to low-income households), Chico (2.13 low-wage jobs to low-income households), and Gridley (1.69 low-wage jobs to low-income households) show a need for more low- and very low-income housing.

The proposed allocation addresses these issues as follows:

- » The fire rebuild allocation addresses the current imbalance of jobs to housing units in Paradise by assigning a large number of units to that jurisdiction.
- » Oroville's higher number of jobs and better transit access, reflected in the Jobs and Transit Connectivity Factors, support the allocation of more housing units to Oroville; however, the city's low Opportunity Score, serves to temper some of the growth. Further, Oroville's existing low- and very-low income households as a percentage of total households in the city exceeds the regional average, so, in accordance with Objective 4, the city's allocation of low- and very-low income households is only moderate.
- » Gridley is just slightly outside of the preferred jobs-housing fit and is allocated a sufficient share of low- and very low-income housing units to encourage a shift to within the desired range.
- » Chico's significant allocation of housing units supports a better jobs-housing balance overall. Further, the City's proportionately large allocation of the region's low- and very low-income housing units supports an improved jobs-housing fit in Chico.

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 draft methodology's distribution of housing units by income tier allocates a lower proportion of housing units by income category to jurisdictions whose existing share of units in that income tier is larger than the regional average. Similarly, the methodology allocates a greater proportion of units by income category to those jurisdictions whose existing share of units in that income tier is smaller than the regional average. As a result, all jurisdictions are assigned housing units by 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.*

BCAG proposes to directly address the objective of affirmatively furthering fair housing by specifically considering the HCD/TCAC Opportunity Analysis and Children Living in Poverty as factors in its methodology.

Furthermore, the draft methodology results in a concentration of housing units in the City of Chico, which offers by far the greatest opportunity in the county, as defined by the HCD/TCAC Opportunity Maps. Chico is one of only two jurisdictions in the county to achieve a positive score (13.14) when the TCAC/HCD Opportunity Map census block group data is aggregated on a jurisdictional scale. The only other jurisdiction to receive a positive score, the City of Gridley, scored only 0.22, and all other jurisdictions scored below zero. Thus, the placement of a preponderance of units in the City of Chico is a strong step toward affirmatively furthering fair housing in the BCAG region.

BCAG 6th Cycle RHNA Draft Methodology Income Allocation Worksheet

A 2018 Pre-Fire Housing by Income Group (Base)

Jurisdiction	Very Low		Low		Moderate		Above Moderate		Total
	%	HU	%	HU	%	HU	%	HU	Housing Units
City of Biggs	16.8%	114	20.7%	141	19.0%	129	43.5%	296	680
City of Chico	28.3%	10,171	13.4%	4,811	15.2%	5,444	43.1%	15,477	35,903
City of Gridley	26.6%	578	15.3%	333	19.8%	431	38.2%	830	2,172
City of Oroville	34.4%	2,136	19.4%	1,205	16.3%	1,009	29.9%	1,854	6,204
Town of Paradise	25.8%	2,864	14.9%	1,659	16.1%	1,785	43.3%	4,810	11,118
Unincorporated	16.5%	5,358	16.1%	5,247	13.7%	4,459	53.7%	17,494	32,558
County Total	23.9%	21,221	15.1%	13,396	15.0%	13,257	46.0%	40,761	88,635

B 2040 Housing by Income Group (Long Range Forecast Horizon Year)

Jurisdiction	Very Low		Low		Moderate		Above Moderate		Total
	%	HU	%	HU	%	HU	%	HU	Housing Units
City of Biggs	32.4%	294	13.6%	124	17.3%	157	36.7%	333	909
City of Chico	32.4%	15,311	13.6%	6,451	17.3%	8,174	36.7%	17,347	47,284
City of Gridley	32.4%	1,107	13.6%	466	17.3%	591	36.7%	1,254	3,417
City of Oroville	32.4%	2,894	13.6%	1,219	17.3%	1,545	36.7%	3,279	8,937
Town of Paradise	32.4%	860	13.6%	363	17.3%	459	36.7%	975	2,657
Unincorporated	16.5%	6,297	16.1%	6,167	13.7%	5,241	53.7%	20,560	38,264
HCD Req for Cycle	26.4%	26,764	14.6%	14,790	15.9%	16,167	43.1%	43,748	101,469
HCD Req for Cycle	26.4%	26,764	14.6%	14,790	15.9%	16,167	43.1%	43,748	101,469
HCD Requirement Adjusted to Keep County Constant	32.4%	20,467	13.6%	8,623	17.3%	10,927	36.7%	23,188	63,205

C RHNA Preliminary Allocation (Maintain 5th Cycle formula, with limit for units to not drop below 0)

Jurisdiction	Very Low		Low		Moderate		Above Moderate		Total
	%	HU	%	HU	%	HU	%	HU	Housing Units
City of Biggs	78.8%	63	0.0%	-	12.3%	10	16.4%	13	81
City of Chico	45.2%	1,575	14.4%	503	24.0%	837	16.4%	573	3,488
City of Gridley	42.4%	146	10.7%	37	12.8%	44	34.0%	117	345
City of Oroville	27.7%	173	0.5%	3	19.6%	123	52.1%	326	625
Town of Paradise	23.7%	81	15.3%	52	15.7%	54	45.3%	155	342
Unincorporated	16.5%	300	16.1%	294	13.7%	250	53.7%	980	1,823
County Total	34.9%	2,339	13.3%	889	19.6%	1,317	32.3%	2,164	6,703
HCD Requirement	26.4%	1,768	14.6%	977	15.9%	1,068	43.1%	2,890	6,703

BCAG 6th Cycle RHNA Draft Methodology Income Allocation Worksheet

D1 Modify to 2012 VL / Low Levels as Max

Jurisdiction	Very Low		Low		Moderate		Above Moderate		Total
	%	HU	%	HU	%	HU	%	HU	Housing Units
City of Biggs	42.4%	34	0.0%	-	23.9%	18	31.8%	25	77
City of Chico	30.9%	1,079	9.9%	344	35.1%	1,222	24.0%	837	3,482
City of Gridley	36.2%	125	9.1%	31	15.0%	52	39.7%	137	345
City of Oroville	27.7%	173	0.5%	3	19.6%	123	52.1%	326	625
Town of Paradise	22.8%	79	14.8%	51	16.0%	55	46.4%	160	344
Unincorporated	16.5%	300	16.1%	294	13.7%	250	53.7%	980	1,823
County Total	26.7%	1,790	10.8%	724	25.7%	1,719	36.8%	2,464	6,697
HCD Requirement	26.4%	1,768	14.6%	977	15.9%	1,068	43.1%	2,890	6,703

D2 Normalize to achieve State affordability targets

Jurisdiction	Very Low		Low		Moderate		Above Moderate		Total
	%	HU	%	HU	%	HU	%	HU	Housing Units
City of Biggs	45.7%	34	0.0%	-	15.5%	11	38.9%	29	74
City of Chico	32.6%	1,066	14.2%	465	23.2%	759	30.0%	982	3,271
City of Gridley	34.4%	123	11.8%	43	9.0%	32	44.8%	161	359
City of Oroville	27.0%	171	0.7%	4	12.0%	76	60.3%	382	634
Town of Paradise	21.1%	78	18.7%	69	9.3%	34	50.9%	187	368
Unincorporated	14.8%	296	19.9%	397	7.8%	155	57.5%	1,149	1,997
County Total	26.4%	1,768	14.6%	977	15.9%	1,068	43.1%	2,890	6,703
HCD Requirement	26.4%	1,768	14.6%	977	15.9%	1,068	43.1%	2,890	6,703

D3 Normalize to achieve assigned jurisdictional total allocation

Jurisdiction	Very Low		Low		Moderate		Above Moderate		Total
	%	HU	%	HU	%	HU	%	HU	Housing Units
City of Biggs	45.7%	37	0.0%	-	15.5%	12	38.9%	31	81
City of Chico	32.6%	1,136	14.2%	496	23.2%	809	30.0%	1,047	3,488
City of Gridley	34.4%	118	11.8%	41	9.0%	31	44.8%	155	345
City of Oroville	27.0%	169	0.7%	4	12.0%	75	60.3%	377	625
Town of Paradise	21.1%	72	18.7%	64	9.3%	32	50.9%	174	342
Unincorporated	14.8%	271	19.9%	362	7.8%	142	57.5%	1,049	1,823
County Total	26.9%	1,803	14.4%	967	16.4%	1,101	42.3%	2,832	6,703
HCD Requirement	26.4%	1,768	14.6%	977	15.9%	1,068	43.1%	2,890	6,703

BCAG 6th Cycle RHNA Draft Methodology Income Allocation Worksheet

D4 Manual adjustment to Chico to achieve State affordability targets

Jurisdiction	Very Low		Low		Moderate		Above Moderate		Total
	%	HU	%	HU	%	HU	%	HU	Housing Units
City of Biggs	45.7%	37	0.0%	-	15.5%	12	38.9%	31	81
City of Chico	31.6%	1,101	14.5%	506	22.3%	776	31.7%	1,104	3,488
City of Gridley	34.4%	118	11.8%	41	9.0%	31	44.8%	155	345
City of Oroville	27.0%	169	0.7%	4	12.0%	75	60.3%	377	625
Town of Paradise	21.1%	72	18.7%	64	9.3%	32	50.9%	174	342
Unincorporated	14.8%	271	19.9%	362	7.8%	142	57.5%	1,049	1,823
County Total	26.4%	1,768	14.6%	977	15.9%	1,068	43.1%	2,890	6,703
HCD Requirement	26.4%	1,768	14.6%	977	15.9%	1,068	43.1%	2,890	6,703

E Fire Rebuild Distribution

Jurisdiction	Very Low		Low		Moderate		Above Moderate		Total
	%	HU	%	HU	%	HU	%	HU	Housing Units
City of Biggs	0.0%	-	0.0%	0	0.0%	-	0.0%	-	-
City of Chico	0.0%	-	0.0%	0	0.0%	-	0.0%	-	-
City of Gridley	0.0%	-	0.0%	0	0.0%	-	0.0%	-	-
City of Oroville	0.0%	-	0.0%	0	0.0%	-	0.0%	-	-
Town of Paradise	3.5%	310	3.5%	310	14.6%	1,287	56.0%	4,930	6,838
Unincorporated	0.0%	-	0.0%	0	9.7%	855	12.6%	1,111	1,965
County Total	3.5%	310	3.5%	310	24.3%	2,141	68.6%	6,041	8,803

F Total Allocation with Fire Rebuild Allocation Incorporated

Jurisdiction	Very Low		Low		Moderate		Above Moderate		Total
	%	HU	%	HU	%	HU	%	HU	HU
City of Biggs	45.7%	37	0.0%	-	15.5%	12	38.9%	31	81
City of Chico	31.6%	1,101	14.5%	506	22.3%	776	31.7%	1,104	3,488
City of Gridley	34.4%	118	11.8%	41	9.0%	31	44.8%	155	345
City of Oroville	27.0%	169	0.7%	4	12.0%	75	60.3%	377	625
Town of Paradise	5.3%	382	5.2%	374	18.4%	1,319	71.1%	5,104	7,180
Unincorporated	7.1%	271	9.6%	362	26.3%	996	57.0%	2,160	3,788
County Total	13.4%	2,078	8.3%	1287	20.7%	3,209	57.6%	8,931	15,506
Overall HCD Requirement	13.4%	2,078	8.3%	1287	21.7%	3,210	57.6%	8,931	15,506