

# 6th Cycle San Benito County Draft Regional Housing Needs Allocation (RHNA) Plan

DRAFT  
July 2022

City of San Juan Bautista - City of Hollister - San Benito County



**SBCOG**

*Council of  
San Benito  
County Governments*



# San Benito County Draft Regional Housing Needs Allocation Plan

July 2022

## Council of San Benito County Governments

The Council of San Benito County Governments (COG) is governed by a board of five (5) elected officials: Two are appointed from each of the Hollister City Council and the San Benito County Board of Supervisors and one is appointed from the San Juan Bautista City Council. The Council of San Benito County Governments is mandated by state law in Government Code Sections 65584, 65584.01, and 65584.04, to prepare a Regional Housing Needs Allocation Plan.

## County Profile

San Benito County is located on the Central California Coast bordered to the north by Santa Cruz and Santa Clara counties, to the west and south by Monterey County, to the south and east by Fresno County, and to the east by Fresno and Merced counties.

San Benito County was formed in 1874 from Monterey County. The county seat, Hollister, was named after Colonel William Wells Hollister. The population has grown from 1,000 in 1874 to 2,750 in 1925 to 55,269 in 2010 to 64,209 in 2020 (U.S. Census Bureau). Major industries in San Benito County include agriculture, manufacturing, service, retail, recreation, mineral, and professional.

According to data from the U.S. Census Bureau, nearly two-thirds of San Benito County resident workers are employed outside of San Benito county.<sup>1</sup> There are more economic opportunities for the workforce in the larger counties to the west and north, and the lack of more affordable housing near employment in those counties has created strong demand for housing locally. Of those working outside of San Benito County, 37 percent travel to Santa Clara County, 21.5 percent travel to Monterey County, and 10.2 percent travel to Santa Cruz County.

From 1990 to 2008 the population of San Benito County grew from 39,697 to 58,000 or at an average annual rate of 2.6 percent.<sup>2</sup> Between 2001 and 2009, the Regional Water Quality

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<sup>1</sup> U.S. Census Bureau, Longitudinal Employer Housing Development (LEHD) Origin-Destination Employment Statistics, 2002-2019, OnTheMap LODS 7.5, <https://onthemap.ces.census.gov>.

<sup>2</sup> San Benito County General Plan, <https://www.cosb.us/home/showpublisheddocument/1782/637205738380400000>

Control Board prohibited the City of Hollister from issuing new developments until a new wastewater treatment facility was built. In addition, the region weathered a dramatic recession beginning in 2007 and growth slowed considerably (4 percent population growth between 2000 and 2010). The region has rebounded somewhat, with 16 percent population growth from 2010 to 2020.

## Background and Purpose

Since 1969, the State of California has required that all local governments (cities and counties) adequately plan to meet the housing needs of everyone in the community. In September 2021, California’s Department of Housing and Community Development (HCD) issued a Regional Housing Need Determination of 5,005 units to the San Benito COG for the 6th Cycle planning period of June 30, 2023 to December 15, 2031 (see Appendix B).

HCD calculated the regional determination using population projections and household formation information from the California Department of Finance and the most recent American Community Survey data regarding overcrowding, cost burden, and vacancy rate. The regional determination includes an overall housing need number, as well as a breakdown of the number of units required in four income distribution categories.

Once HCD issues their determination, COG develops a Regional Housing Needs Allocation (RHNA) Plan, which establishes the total number of housing units that each city and county must plan for within the eight-year planning period. The allocation must further five statutory RHNA objectives, described in the Housing Element Law section below, as outlined in state housing element law (Government Code Sections 65580 et seq.). Based on the adopted RHNA, each jurisdiction must update its housing element to demonstrate how the jurisdiction will meet their RHNA allocation over the eight-year planning period.

This document, the RHNA Plan, officially assigns the allocations to San Benito County jurisdictions—Hollister, San Juan Bautista, and unincorporated areas of San Benito County.

This plan provides an overview of the RHNA process and describes the adopted RHNA methodology, including total unit allocations and allocations by income category. This plan also describes how the allocation meets the five statutory RHNA objectives. The appendix includes documents that were part of the planning process, such as official correspondence from HCD regarding the regional determination and methodology review, COG Board agenda items, results of a statutorily required jurisdiction survey, and comments received during the planning process.

Table 1, below, shows the result of this planning process—an allocation of housing units by income level that jurisdictions plan to accommodate in their housing elements over the June 30, 2023 to December 15, 2031 timeframe.

**Table 1: 6th Cycle RHNA Allocation, by Income Level, for San Benito County Jurisdictions**

	Very-Low	Low	Mod.	Above-Mod.	Total
San Benito County	1,110	890	947	2,058	5,005
Hollister	846	678	826	1,813	4,163
San Juan Bautista	18	14	18	38	88
Unincorp. San Benito	246	198	103	207	754

Source: California Department of Housing and Community Development (2021).

### Housing Element Law

The state housing element law (Government Code Section 65584 (d)) requires the RHNA to be consistent with five objectives:

1. Increasing the housing supply and the mix of housing types, tenure, and affordability in all cities and counties with the region in an equitable manner, which shall result in all jurisdictions receiving an allocation of units for low- and very-low-income households.
2. Promoting infill development and socioeconomic equity, the protection of environmental and agricultural resources, 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.
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.
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.
5. Affirmatively furthering fair housing.

As explained below, the Association of Monterey Bay Area Governments’ (AMBAG’s) Metropolitan Transportation Plan and Sustainable Communities Strategy (MTP/SCS) and its RHNA are consistent with these objectives.

### The Metropolitan Transportation Plan/Sustainable Communities Strategy and RHNA

Senate Bill (SB) 375, passed into state law in 2008, requires the coordination of housing planning with regional transportation planning through the MTP/SCS. This coordination requires consistency in growth forecasts for land use, housing, and transportation purposes. In prior plans, the RHNA and the MTP were prepared independently and had different timelines and planning periods. SB 375 requires that the RHNA and MTP/SCS process be undertaken together to integrate housing, land use, and transportation planning to ensure the state’s housing goals are met and help reduce greenhouse gas emissions (GHG) from cars and light-duty trucks. The goal of this integrated planning is to create opportunities for residents of all incomes to have

access to jobs, housing, services, and other common needs by a variety of means, including public transit, walking, and bicycling.

Prior to SB 375, RHNA was updated every five years and the MTP was updated every four years. Because SB 375 requires better coordination between transportation planning, land use, and housing planning, the RHNA process is now tied to the adoption of every two cycles of the regional MTP/SCS. As a result, the RHNA Plan must be adopted every eight years, aligning with the adoption of the MTP/SCS. This schedule also means that each city and county will update its housing element every eight years.

**Importance of RHNA for Local Governments**

RHNA does not necessarily encourage or promote growth, but rather requires communities to anticipate growth so that collectively the region can grow in ways that enhance quality of life, improve access to jobs, promote transportation mobility, and address fair share housing needs. RHNA is a projection of additional housing units needed to accommodate projected household demand of all income levels from the start until the end date of the projection period.

RHNA is not a prediction of building permits, construction, or housing activity, nor is it limited due to existing land use capacity or growth controls (rezoning is often necessary). Other factors, such as market forces, are beyond a jurisdiction’s control and have considerable influence over whether housing units in each income category are actually constructed.

Following this plan, jurisdictions in San Benito County must adopt a housing element by December 2023 that demonstrates, among other things, how they can accommodate the RHNA numbers through zoning.

**Description of Process and Planning Timetable**

The process for allocating each Council of Governments member’s share of the regional housing need is outlined in Table 2 below:

*Table 2: Schedule and Timeline*

Step	Action	Responsible	Deadline
Regional Housing Need Determination	HCD issues a Regional Housing Need Determination (RHND). COG has 30 days to object. (Discussed Sept. 2021.)	HCD & COG	September 2021
Draft Methodology	COG approves a methodology to allocate the RHND across local jurisdictions in compliance with statutory objectives and submits to HCD for review.	COG	May 19, 2022

HCD Review	HCD reviews the methodology for compliance with statutory objectives (within 60 days).	HCD	May - July 22, 2022
Draft RHNA Plan	COG releases a draft RHNA plan, which includes a discussion of regional goals and objectives, based on the methodology (if HCD finds that the methodology furthers statutory objectives).  Jurisdictions and HCD have 45 days to appeal the methodology.	COG  Jurisdictions & HCD	July 21, 2022  September 6, 2022
Public comment (if appeals received)	Local jurisdictions and HCD may comment on appeals, if any are received.	Jurisdictions and HCD	September 6-October 21, 2022
Public hearing (if appeals received)	COG Board holds public hearing on appeals, if any are received.	COG	November 17, 2022
Determination on appeals	COG Board makes final determination on appeals, if any are received.	COG	November 30, 2022
Final RHNA Plan	COG Board approves final RHNA plan.  COG submits the Final RHNA Plan to HCD (within 3 days)	COG	December 15, 2022  December 19, 2022
Housing Elements	Local jurisdictions begin updating their housing elements to identify sites and policies.	Jurisdictions	December 2023
Housing Policies	Jurisdictions revise housing policies, such as zoning or inclusionary ordinances, to carry out goals such as ensuring affordable housing.	Jurisdictions	Ongoing

### Steps in the RHNA Process, From Determination to Housing Element

Based on the regional determination provided by HCD, COG must develop the allocation of units to each jurisdiction, along with the plan document that contains the allocations. It is COG’s responsibility to coordinate with HCD prior to its determination of the regional housing need. Once COG receives the regional determination, including the overall need number and the

income category distribution, it must adopt a methodology for distributing the regional growth number throughout the region. The methodology is the basis for the final RHNA Plan that COG adopts.

The methodology used for the RHNA distribution is developed in coordination with the local jurisdictions via the COG Board of Directors, meetings with jurisdiction staff, and presentations to each city council and the County Board of Supervisors, as well as with input from the public. The state-mandated RHNA Plan establishes the total number of housing units that each city and county must plan for within the eight-year planning period broken into four income categories as described above. Based on State General Plan Housing Element Law (Gov. Code sec. 65580 et seq.), and on the adopted RHNA, each city and county must update its housing element by December 2023.

**HCD Issues the Regional Housing Needs Determination (RHND)**

The California Department of Housing and Community Development (HCD) identifies the total number of homes for which each region in California must plan to meet the housing needs of people at all income levels. The total number of housing units from HCD is separated into four income categories that cover everything from housing for very-low-income households all the way to market rate housing. The four income categories included in the RHND are:

- Very-Low Income: Less than 50 percent of area median income.
- Low Income: 50 percent to 80 percent of area median income.
- Moderate Income: 80 percent to 120 percent of area median income.
- Above-Moderate Income: 120 percent or more of area median income.

In a letter dated September 10, 2021, the HCD provided COG with the RHND for use in this cycle of RHNA (see Table 3 and Appendix B).

***Table 3: RHND From HCD for Council of San Benito County Governments for the Period June 30, 2023 to December 15, 2031***

Income Category	Percentage	Number of Units
Very-Low *	22.2%	1,110
Low	17.8%	890
Moderate	18.9%	947
Above-Moderate	41.1%	2,058
<b>Total</b>	<b>100.0%</b>	<b>5,005</b>

Source: California Department of Housing and Community Development (2021).

The RHND is based on a population and household forecast for the region from the California Department of Finance (DOF) and the application of specific adjustments to determine the total amount of housing needs for the region. The factors and adjustments changed between the 5th and 6th cycle due to legislation that sought to incorporate an estimate of the existing housing

need by applying factors related to vacancy, overcrowding, and cost burden. The full list of factors to be considered, as defined in Government Code section 65584.01(b)(1), includes the following:

- Anticipated household growth associated with projected population increases.
- Household size data and trends in household size.
- The percentage of households that are overcrowded and the overcrowding rate for a comparable housing market.
- The rate of household formation, or headship rates, based on age, gender, ethnicity, or other established demographic measures.
- The vacancy rates in existing housing stock, and the vacancy rates for healthy housing market functioning and regional mobility, as well as housing replacement needs. For purposes of this subparagraph, the vacancy rate for a healthy rental housing market shall be considered no less than 5 percent.
- Other characteristics of the composition of the projected population.
- The relationship between jobs and housing, including any imbalance between jobs and housing.
- The percentage of households that are cost burdened and the rate of housing cost burden for a healthy housing market.

The RHNA process only considers the needs of the population in households who are housed in the regular housing market; it excludes the population living in group quarters, which are non-household dwellings such as jails, nursing homes, dormitories, and military barracks. HCD uses the age cohorts of the forecasted population to understand the rates at which people are expected to form households, which can vary for people at different stages of life. This process results in the estimate of the total number of households that will need a housing unit in 2031, which is the end date of the projection period for AMBAG's current RHNA cycle.

The total number of projected households is then adjusted using the factors related to vacancy rate, overcrowding, and an estimate of the need for replacement housing for units that were demolished or lost. These adjustments result in a forecast of the number of housing units that will be needed to house all households in the region in 2031. The number of expected occupied housing units at the beginning of the RHND period is subtracted from the total number of housing units needed, which results in the number of additional housing units necessary to meet housing demand. The final step is an adjustment related to cost-burdened households, which leads to the total RHND.

### **COG Distributes Units to Jurisdictions**

California's Housing Element Law (Government Code Sections 65580 et seq.) mandates that COG develop and approve a RHNA methodology and RHNA Plan for San Benito County and the cities within. The methodology is the basis for the final RHNA Plan that COG adopts.

The RHNA has two parts as required by state law:

1. Overall Allocation: HCD assigns COG a total housing unit number for growth during the planning period for San Benito County. COG is required to distribute this regional housing growth number to the jurisdictions within the region for the period from January 30, 2023 to December 15, 2031.
2. Income Category Distributions: HCD also provides a household income distribution of the total regional housing unit number. As defined by state law, four income categories make up this distribution: very-low income (less than 50 percent area median income [AMI]); low income (50 to 80 percent AMI); moderate income (80 percent to 120 percent AMI); and above-moderate income (above 120 percent AMI). COG must allocate the units by income category to each jurisdiction.

### **Jurisdictions Prepare Housing Elements**

Once a local government has received its final RHNA from COG, it must revise the Housing Element of its general plan and update zoning ordinances to accommodate its portion of the region's housing need. For this cycle, housing element updates must be completed by December 2023. Communities are also required to report their progress to HCD annually.

The four income categories, as listed above, must be addressed in a jurisdiction's housing element. Specifically, accommodations must be made to ensure that the jurisdiction provides sufficient zoning capacity to accommodate the projected housing need in each income category. For the categories of very-low and low income, jurisdictions generally are required to identify sites (constructed or vacant) zoned at multifamily residential densities.

It is important to note that each jurisdiction is responsible for providing sufficient zoning capacity for the units allocated to all four economic income categories but is not responsible for the construction of these units. The intent of the housing element law is to ensure that jurisdictions do not impede the construction of housing in any income category. Other factors, such as market forces, are well beyond a jurisdiction's control and have considerable influence over whether housing units in each income category are actually constructed. The HCD website contains more information about Housing Element compliance.<sup>3</sup>

## **Guiding Principles**

The Council of Governments coordinated the effort of this Regional Housing Needs Allocation Plan with the Cities of Hollister and San Juan Bautista, and the County of San Benito. Additionally, at the forefront of the allocation methodology was the recognition that the region is suffering from infrastructure constraints, including deteriorating roads and limited sewer and water

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<sup>3</sup> See the Housing Elements section of the HCD website, <https://www.hcd.ca.gov/community-development/housing-element/index.shtml>

infrastructure. At each step of the process the COG Board prioritized the affordability of housing and infill development. By focusing on infill opportunities, the region can address multiple goals, including to maximize the preservation of agricultural lands, reduce commuting, reduce demand on already-strained infrastructure, and increase affordability.

Each Council of Governments member's share of the regional housing need shown in this Plan shall be used in that member's Housing Element as the local goal in planning for and accommodating the regional housing need. The number of dwelling units allocated to each Council of Governments member should be considered as a minimum housing need. Nothing in this Plan restricts or prohibits the local jurisdictions from planning for a higher number of dwelling units than its regional allocation. The goal of the Regional Housing Needs Plan is to assure a fair distribution of housing among the cities and county, so that every community provides an opportunity for a mix of housing affordable to all economic segments. The housing allocation targets are not building requirements, but goals for each community to plan for and accommodate through appropriate planning policies and land use

## Description of Allocation Methodology

The methodology for the housing needs allocation is broken down into three phases:

1. Review methodology options for the allocation of housing.
2. Allocation of housing units by jurisdiction.
3. Allocation of housing units by income group.

### Review Methodology Options for the Allocation of Housing

Once the Council of Governments receives the countywide housing allocation provided by the California Department of Housing and Community Development, including the overall needs number and the income category distribution, it must adopt a methodology for distributing the regional growth number throughout the region.

Staff reviewed several options for distributing the regional housing need with planning staff of the local jurisdictions. Some of the options included distributing the housing need determination by jobs, housing, or employment based on past, present, and future numbers.

### Allocation of Housing Units by Jurisdiction

The Council of Governments is required to allocate a fair share of the housing need to each jurisdiction. In this case, the Council of Governments worked with the Cities of Hollister and San Juan Bautista and the County of San Benito to draft a distribution methodology. The methodology also reflects input from the COG Board of Directors and the public.

Ultimately a jobs/housing methodology was selected as the preferred option and recommended to the Council of Governments Board of Directors. The Board of Directors reviewed this

methodology on December 16, January 11, January 20 (Public Hearing), February 17, and approved it on May 19, 2022.

**Table 4: RHNA Allocation Methodology**

Total Unit Allocation										
Jobs				Resilience				65%		
	Jobs	%	Units	% Area Not in High-Risk Zone	J/H Ratio	Risk x Jobs x J/H Ratio	% Reg.	Units	TOTAL Units	
	2020	Reg.								
<b>San Benito County</b>	23,263		1,752					3,253	<b>5,005</b>	
<b>Hollister</b>	15,492	67%	1,167	100%	1.3	20,139	92%	2,996	<b>4,163</b>	
<b>San Juan Bautista</b>	557	2%	42	81%	0.7	308	1%	46	<b>88</b>	
<b>Uninc. San Benito</b>	7,214	31%	543	20%	1.0	1,419	6%	211	<b>754</b>	
Unit Allocation by Income										
	% of HHs in High/Highest AFFH Tracts		% Units in Very-Low and Low	Units by Income Level				TOTAL Units		
				Very-Low	Low	Mod.	Above -Mod.			
<b>San Benito County</b>			40%	1,110	890	947	2,058	<b>5,005</b>		
<b>Hollister</b>		0%	37%	846	678	826	1,813	<b>4,163</b>		
<b>San Juan Bautista</b>		0%	36%	18	14	18	38	<b>88</b>		
<b>Uninc. San Benito</b>		42%	59%	246	198	103	207	<b>754</b>		

Source: Council of San Benito County Governments (2022).

All data used in the development of the RHNA methodology is based on the following publicly available sources:

- a. Jobs: Association of Monterey Bay Area Governments (AMBAG) 2022 Regional Growth Forecast, based on InfoUSA and California Employment Development Department (2020).
- b. Resiliency: Percent of land area not in high-fire risk zone, California Department of Forestry and Fire Protection (CALFIRE), California Public Utilities Commission (CPUC).
- c. Jobs/Housing (J/H) Ratio: Number of jobs divided by the number of housing units. Jobs data are from AMBAG 2022 Regional Growth Forecast, based on InfoUSA and California Employment Development Department (2020), and housing data are from California Department of Finance (2020).
- d. Affirmatively Furthering Fair Housing (AFFH): Proportion of households in high/highest resource areas—household data from U.S. Census Bureau, American Community Survey, and resource type from HCD/California Tax Credit Allocation Committee (TCAC) Opportunity Map.

**First and Second Steps in RHNA Methodology: Jobs, Resilience, and Jobs/Housing Balance**

This RHNA methodology allocates 35 percent of the units based on the total number of jobs in each jurisdiction, and the 65 percent to jurisdiction(s) based on an index of wildfire risk, jobs/housing balance and total jobs. Hollister has almost no area identified as being at high wildfire risk, has the highest jobs/housing ratio (more jobs than housing), and the largest number of jobs. San Juan Bautista has some area at high wildfire risk, more housing than jobs, and very few jobs. Much of the land area in Unincorporated San Benito County is at high wildfire risk (only 20 percent is not), has a nearly equal number of jobs and houses, and about 31 percent of the region’s jobs. The result across all factors is that most of the unit allocation is in Hollister.

**Third Step in RHNA Methodology: Income Allocation**

An important objective of RHNA is to increase housing equity across jurisdictions. RHNA objective 1 must ensure that the plan allocates 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

Unlike many other COGs, jurisdictions in San Benito County have similar socioeconomic characteristics and small differences in estimates may not be statistically significant (see Table 5 for a brief comparison). This similarity does not eliminate the need to address equity, particularly in the distribution of lower-income RHNA, but it does suggest that adjustments may not need to be as dramatic as they might be in COGs that have wider existing equity gaps.

*Table 5: Comparison of Socioeconomic Characteristics in San Benito County Jurisdictions*

	Total Population	Jobs/ Housing Ratio	Poverty Rate	% non- Hispanic White	% Crowded	% HHs in High/Highest Resource Areas
San Benito County	64,209	1.2	8%	31%	7%	15%
Hollister	41,678	1.3	10%	23%	9%	0%
San Juan Bautista	2,089	0.7	9%	35%	8%	0%
Uninc. San Benito	20,442	1.0	6%	46%	3%	42%

Sources: U.S. Census Bureau, 2020 Census and American Community Survey; Association of Monterey Bay Area Governments 2022 Regional Growth Forecast; California Department of Housing and Community Development/California Tax Credit Allocation Committee, Opportunity Map 2021.

To accomplish the equity objective, the methodology shifts units across income categories—redistributing a portion of very-low- and low-income units out of jurisdictions with no high/highest resource areas and shifting those units to jurisdictions with high/highest resource areas based on the proportion of their jurisdiction’s households in a high/highest resource area, using HCD/California Tax Credit Allocation Committee (TCAC) Opportunity Map. The result is that the jurisdiction (unincorporated San Benito County) has 59 percent of its RHNA allocation as very-low- and low-income units, while Hollister and San Benito have less than 37 percent of

their RHNA allocation in lower-income categories. This shift ensures that non-high-income jurisdictions do not get a disproportionate share of lower income units.

While our methodology assigns a larger share of very-low- and low-income units to the unincorporated area to address that jurisdiction's slightly higher socioeconomic indicators, in general variations across jurisdictions are small and may not be statistically significant. Considering the similarity of socioeconomic characteristics regionwide, in developing the methodology, COG prioritized higher-density infill opportunities with better access to jobs, primarily in the City of Hollister, and emphasized the protection of agricultural resources by allocating fewer units to the unincorporated county. We received supportive public comment from Monterey Bay Economic Partnership (MBEP) on this approach.

## Meeting RHNA Objectives

The following section summarizes how the development of the RHNA allocation methodology and the income group allocation methodology satisfies the five statutory objectives (Govt. Code §65584(d)(1-5)).

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

The 6th Cycle RHNA methodology allocates units to all jurisdictions in San Benito County. The proposed RHNA methodology affirmatively furthers fair housing by allocating units based on TCAC data and by allocating a larger share of very-low- and low-income housing in jurisdictions that have an above-average share of households in advantaged areas.

To promote a mix of housing types, the methodology adjusts jurisdictions' allocations by income levels, and provides larger shares of very-low- and low-income categories to the unincorporated County, which has high/highest resource areas. Jurisdictions that already contain a disproportionately high share of very-low- and low-income households are allocated higher proportions of moderate and above-moderate housing allocations. In accordance with State law, each jurisdiction is allocated housing in all four income groups.

### **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 directly complements the region's sustainable communities' strategy (SCS), which seeks to reduce greenhouse gases emitted by light-duty vehicles. For the SCS, San Benito County is part of the larger Association of Monterey Bay Area Governments (AMBAG). AMBAG's SCS achieves the required greenhouse gas emissions (GHG) with a critical strategy that addresses the region's jobs-housing imbalance. AMBAG achieves its GHG target of a 6 percent reduction per capita for 2035. AMBAG's SCS promotes infill development, socioeconomic equity, and the protection of agricultural resources.

In San Benito County, nearly 85 percent of the region's determination is allocated to incorporated cities, thereby advancing this objective by promoting infill development. In addition, the allocation provided to the unincorporated county could reasonably be assumed to be accommodated within currently developed areas.

**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.**

By allocating a substantial share of the RHND based on jobs and jobs/housing balance, the methodology directly addresses the imbalance between jobs and housing. The methodology allocates a majority of units to Hollister, which has the most jobs in the region.

**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.**

As noted above, San Benito County jurisdictions have very similar socioeconomic characteristics. The unincorporated County has slightly higher income and slightly lower crowding than the cities of Hollister and San Juan Bautista. However, consistent feedback through public meetings—including from housing advocates—is that for reasons of infrastructure and greenhouse gas emissions, affordability, and protecting agricultural land, the unincorporated area should receive a relatively low share of total units. Any additional units allocated to the unincorporated area to meet objective 4 would be detrimental to the region's ability to meet objectives 1 and 2.

**5. Affirmatively furthering fair housing.**

The proposed RHNA methodology affirmatively furthers fair housing by more lower-income units to the unincorporated County, which is the only jurisdiction that has high/highest resource areas according to the TCAC Opportunity Maps.

## **Regional Housing Needs Allocation Plan Factors**

When developing its Regional Housing Needs Allocation Plan, state law (Government Code Section 65584.04(b)(1)) requires that COG consider, to the extent that sufficient data are available, the following factors:

**1. Jobs and housing relationship.**

*Each member jurisdiction's existing and projected jobs and housing relationship. This shall include an estimate based on readily available data on the number of low-wage jobs within the jurisdiction and how many housing units within the jurisdiction are affordable to low-wage workers as well as an estimate based on readily available data, of projected job growth and projected household growth by income level within each member jurisdiction during the planning period*

The RHNA methodology directly incorporates jobs and jobs/housing balance.

## **2. The opportunities and constraints to development.**

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

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

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

*(C) Lands preserved or protected from urban development under existing federal or state programs, or both, designed to protect open space, farmland, environmental habitats, and natural resources on a long-term basis, including land zoned or designated for agricultural protection or preservation that is subject to a local ballot measure that was approved by the voters of that jurisdiction that prohibits or restricts conversion to nonagricultural uses.*

*(D) County policies to preserve prime agricultural land, as defined pursuant to Section 56064, within an unincorporated area and land within an unincorporated area zoned or designated for agricultural protection or preservation that is subject to a local ballot measure that was approved by the voters of that jurisdiction that prohibits or restricts its conversion to nonagricultural uses.*

In the jurisdiction survey (see Appendix C) San Benito County identified all four factors (A through D) as constraints to development, and San Juan Bautista identified factor B as a constraint. Hollister did not identify any of the factors as constraints. Since the methodology allocates most units to Hollister, the methodology addresses opportunities and constraints to development.

## **3. Opportunities to maximize transit and existing transportation infrastructure.**

The transportation system overall in San Benito County is in poor condition, as described in more detail in the COG Concerns with the 6th Cycle Regional Housing Need Determination section, below. Focusing the region's RHNA allocation in Hollister puts housing in the jurisdiction that has the most potential for reducing impact on the region's already strained transportation system.

**4. Agreements between a county and cities in a county to direct growth toward incorporated areas of the county.**

As noted in Appendix C, there are no agreements between the County and cities to direct growth toward the county's incorporated areas.

**5. The loss of units contained in assisted housing developments.**

As noted in Appendix C, there were no reported losses of units in assisted housing developments.

**6. High-housing cost burdens.**

As noted above, most jurisdictions in San Benito County have similar socioeconomic characteristics. To address cost burden, the final methodology allocates lower-income units to all jurisdictions, with a larger share of lower-income units assigned to the unincorporated County. The unincorporated County is the only jurisdiction that has high/highest resource areas according to the California Tax Credit Allocation Committee (TCAC) Opportunity Maps. Putting additional lower-income units in high/highest resource areas meets the RHNA objective of addressing high housing cost burdens.

Local governments will have additional opportunities to address jurisdiction-specific issues related to cost-burdened households when they update their housing elements.

**7. The rate of overcrowding.**

As noted above, most jurisdictions in San Benito County have similar socioeconomic characteristics. To address overcrowding, the final methodology allocates lower-income units to all jurisdictions, with a larger share of lower-income units assigned to the unincorporated County, which is the only jurisdiction that has high/highest resource areas according to the TCAC Opportunity Maps.

Local governments will have additional opportunities to address jurisdiction-specific issues related to overcrowding when they update their housing elements.

**8. The housing needs of farmworkers.**

Farmworker housing needs in this RHNA Plan are addressed in the very-low income category. Low-income housing developments were built in the last two decades in San Benito County. Many of the residents in these communities work in the agricultural industry. The San Benito County Labor Camp helps address the existing and transient housing needs of farmworkers.

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

The Gavilan College Hollister site offers a limited number of classes due to its small size. Gavilan College is planning to grow its Hollister campus and move to a new location but will likely take many years to accomplish. The existing and future housing needs of students, faculty, and staff are accommodated in the income categories identified in this Regional Housing Needs Allocation Plan. There are currently no group quarters associated with the Gavilan College Hollister site.

**10. Housing needs of individuals and families experiencing homelessness.**

Comprehensive jurisdiction-level data about individuals and families experiencing homelessness are not available for the region’s jurisdictions. As a result, this topic was not included as a specific factor in the final RHNA methodology. However, the methodology does consider the housing needs of individuals and families experiencing homelessness by allocating very-low- and low-income units to all jurisdictions throughout the region.

**11. Loss of units during an emergency.**

In the jurisdiction survey, no jurisdictions reported unit loss (see Appendix C). Even so, the RHND included HCD’s minimum replacement adjustment of 0.5 percent. Thus, unit loss is addressed in the overall unit allocation.

**12. SB 375 Greenhouse Gas Reduction Targets.**

By allocating a large share of units to the City of Hollister, which has the majority of the region’s jobs and is more densely developed than San Juan Bautista and the unincorporated County, the allocation is intended to reduce commuting distances and associated GHG emissions throughout the region.

**13. Any other factors adopted by the council of governments.**

There were no other factors adopted by COG for considering in the allocation of housing units to the jurisdictions.

## **COG Concerns with the 6th Cycle Regional Housing Need Determination**

While the COG Board supports affordable housing, Board members also recognize that the region is increasingly becoming a bedroom community for neighboring counties. This change leads to five specific areas of concern.

### **Transportation Infrastructure and Greenhouse Gas Reduction Challenges**

A staggering two-thirds of San Benito County residents commute to jobs outside of the county. San Benito County provides housing at lower costs than surrounding communities to the north and west and is a place from which many residents travel long distances to access jobs. A lack of affordable homebuilding in urbanized areas is one of the fundamental causes of California's housing crisis, and rural communities like San Benito County carry the burden of providing the housing stock for surrounding, thriving communities. County residents who commute elsewhere for their jobs often leave much of their tax dollars in the coffers of other communities—resulting in the County’s inability to address some of its most basic transportation needs. The spatial mismatch between jobs and affordable housing has caused growing numbers of workers to reside farther from their workplaces.

Daily traffic at the San Benito/Santa Clara County line has more than doubled since the mid-1990s due to rapid population growth and commute trips and is expected to double again by

2040. State highways located in San Benito County have reached capacity and are experiencing extreme congestion. Improvements to Highway 25, which provides direct access to jobs in Santa Clara County, will not be constructed for at least the next decade, which further perpetuates driver frustration and increases motor vehicle accidents.

State housing law 65584 (a)(3) includes the following to address the above-mentioned statement:

*The Legislature finds and declares that insufficient housing in job centers hinders the state's environmental quality and runs counter to the state's environmental goals. In particular, when Californians seeking affordable housing are forced to drive longer distances to work, an increased amount of greenhouse gases and other pollutants is released and puts in jeopardy the achievement of the state's climate goals, as established pursuant to Section 38566 of the Health and Safety Code, and clean air goals.*

As such, the increased RHNA allocation impacts rural communities, which in turn negatively impacts the state's environmental goals of reducing GHG, improving water quality, fire safety, etc.

Furthermore, in 2018, the California Statewide Needs Assessment Project surveyed California's 57 counties and 482 cities on the condition of local streets and roads infrastructure. It collected data on the amount and type of funding used to support the needs of pavement, essential component needs, and bridges. The condition of California's local streets and roads has continued to deteriorate significantly since the initial study. On a scale of zero (failed) to 100 (excellent), the statewide average Pavement Condition Index (PCI) is now 65 ("At Risk" category). Even more alarming, 53 of 58 counties are either at risk or have poor pavements. The San Benito region ranked one of eight counties in the State of California to have an average pavement condition of less than 49, significantly worse than the statewide average. The countywide average pavement condition index in San Benito is 37, which is a significant drop from 46 in 2016. Increasing the RHNA housing allocation in San Benito County further contributes to the increase of vehicle miles traveled as commuters must commute longer distances to access higher paying jobs – further impacting the region's poor condition index.

### **Impacts on Rural Regions**

San Benito County is a rural community, and it lacks the ability to build and maintain the infrastructure needed to support the RHNA allocation. Without these means of support, jurisdictions are overly burdened by having to accommodate high numbers of growth. The San Benito region also does not have the economy of scale to fund such infrastructure improvements.

### **Sewer Infrastructure Constraints**

The unincorporated areas of San Benito County do not have a sewer system. In these areas, houses are spaced so far apart that a regional sewer system would be too expensive to install.

Currently, the County of San Benito does not have access to a sewer plant. There is a sewer plant within the jurisdiction of the City of Hollister, but the County is prohibited from accessing it by LAFCO law. As a result, the County would need to construct new sewer facilities to support any growth that cannot be accommodated with septic systems. Recently, the County explored the idea of constructing a new sewer facility. The study revealed that a facility capable of processing 100,000 gallons per day could accommodate 715 houses. The cost was more than \$8,000,000 and it would be a minimum five-year project requiring a complete environmental impact study. It should be noted that the Central Coast Regional Water Board is against the construction of additional plants and strongly encourages the City of Hollister to regionalize the sewer facility, eliminating the LAFCO entanglement and permitting San Benito County access. It should also be noted that the City of Hollister currently has a sewer plant with more than 2 million gallons per day of remaining capacity.

As populations continue to expand beyond the reach of municipal sewer systems, more families are relying on individual onsite wastewater treatment systems and private water supplies. The proximity of onsite water and wastewater systems in subdivisions and other developed areas, reliance on marginal or poor soils for onsite wastewater disposal, and a general lack of understanding by homeowners about proper septic-tank system maintenance pose a significant threat to public health. Medium- and high-density housing cannot develop in rural areas without sewers because of poorly drained soils and other constraints on onsite wastewater treatment systems.

While the COG Board recognizes the statutory deadlines related to housing element updates, the region's infrastructure constraints may necessitate consideration of temporary building moratoria.

### **Preservation of Prime Farmland**

Farmland in the San Benito region is a vital local, statewide, and national resource. With its unique climate, along with fertile soils, and water supplies, agriculture is San Benito County's largest industry. In 2020, the gross value of agricultural production came to more than \$338 million. Approximately 882,675 acres of all land are in unincorporated San Benito County, and about 747,400 acres are zoned for agriculture (85 percent).

Many communities in the San Benito region have experienced significant loss of agricultural lands—a finite resource. In particular, non-agricultural development has sprawled into rural spaces, especially on the edges of metropolitan areas. Recognizing the long-term economic, environmental, and social costs of this loss, many communities have taken steps to protect these agricultural lands. Local governments have adopted many planning, regulatory, and programmatic strategies to protect farmland and support the viability of their agricultural sectors. Approximately 559,270 acres are specifically governed by Williamson Act contracts (63 percent).

## Educational Facilities at Capacity

Local schools have reached capacity and school districts are unable to bond for new educational facilities because they have reached bonding capacity. Extreme population growth will lead to failure in our local education system due to constraints in classroom space and available facilities. Larger classrooms lend themselves to a more disruptive environment because of the greater number of students to manage. A smaller, focused classroom provides students with a more positive learning environment.

## COG Proposal for Prioritizing Affordability for San Benito County Residents

Some jurisdictions are incorporating “workforce housing” considerations into their above-moderate income categories. The COG could encourage Hollister, San Juan Bautista, and San Benito County to identify workforce housing set-asides within the above-moderate income category. Through the RHNA Plan, the COG Board could initiate efforts to develop regional thresholds and policies to ensure that the above-moderate category meets workforce housing needs.

For example, many jurisdictions have further subdivided the above-moderate income category into locally relevant income tiers. A common example is a local definition of “workforce housing,” which might be defined as 120 percent to 180 percent of the median income for their location. The income cap or number of “tiers” that a local jurisdiction may define within the above-moderate category are subjective and can be tailored to fit the particular needs of the community.

After these categories are defined locally, jurisdictions can implement additional policies as to when and how they will require these units to be developed. Enactment of workforce housing policies is most likely to be done in a similar way to inclusionary policies for the very-low, low, and moderate income categories. A jurisdiction may require a certain percentage of units for developments that are larger than a specified size to include some “workforce housing” with appropriate restrictions. Or, a jurisdiction could consider policies that support incentives like a reduction in fees or requirements that support the development of this type of housing. For the purposes of RHNA, any of these housing units that are developed would count toward the above-moderate category, but they would have local restrictions on their rents or selling prices based on the zoning policies implemented by each jurisdiction.

- Inclusionary zoning, also known as inclusionary housing, refers to municipal and county planning ordinances that require a given share of new construction to be affordable by people with low to moderate incomes.

- Upzoning refers to changing the zoning of a land area to more intensive, mixed, and/or higher-density use. For example, from single-family zoning allowing just one unit per land lot to a designation allowing a four-unit building on the same lot.

During their May 2022 meeting, the COG Board directed staff to pursue a workforce housing segment within the Above-Moderate category, convene a working group to set thresholds for workforce housing income levels, encourage local jurisdictions to adopt those thresholds in their housing elements, and encourage local jurisdictions to amend or adopt inclusionary zoning to encompass workforce housing.

At the May 19, 2022, meeting, the COG Board of Directors approved the draft RHNA methodology for submittal to HCD for review and comment. This action initiated the preparation of the enclosed San Benito County Draft Regional Housing Needs Allocation (RHNA) Plan. The RHNA Plan addresses the COG Board's comments and concerns surrounding the San Benito region's infrastructure constraints, including deteriorating roads and limited sewer and water infrastructure.

Specifically, the COG Board recommends to the City of Hollister, City of San Juan Bautista, and the County of San Benito, to implement the following policies due to the lack of capacity of local highways, schools, infrastructure, and community impacts:

1. Include a workforce housing category of up to 300 percent and adjust as needed to a higher or lower number based on future information.
2. San Juan Bautista's adoption of a temporary building moratorium until such time that their sewer and water issues have been addressed.
3. Use RHNA income shares as a guideline for the income mix of all new residential developments:
  - Very low 22 percent
  - Low 18 percent
  - Moderate 19 percent
  - Above moderate 41 percent
4. Eliminate Single Family Zoning by replacing single-family homes with denser developments.

At each step of the process the COG Board prioritized the affordability of housing and infill development. By focusing on infill opportunities, the region can address multiple goals, including to maximize the preservation of agricultural lands, reduce commuting, reduce demand on already-strained infrastructure, and increase affordability.

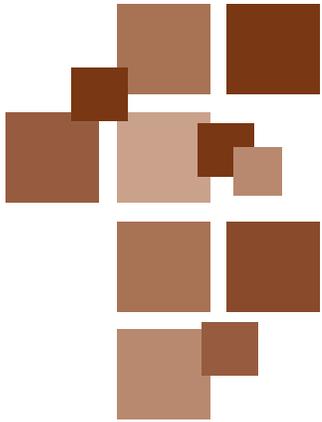
## **Public Hearing and Comments**

The Council of San Benito County Governments posts its agendas at locations freely available to the public. The Board discussed and provided direction to staff on the Regional Housing Need Allocation at three public meetings prior to releasing the draft Regional Housing Needs Allocation Plan in April. The Council of San Benito County Governments also noticed the public hearing in the local free newspaper.

At the public hearing on January 20, 2022, there was one public comment received from Monterey Bay Economic Partnership (MBEP). Elizabeth Madrigal, Housing Associate, stated that the organization supported Option F—the allocation shown in the draft methodology options. Ms. Madrigal stated that option F supports denser and more affordable housing where jobs are located. MBEP is a private, nonprofit (501(c)(3)) in Monterey, San Benito, and Santa Cruz counties focused on improving the economic health and quality of life in the region.

## Appendix A

Institute for Local Government - Understanding SB 375: Regional Planning for Transportation,  
Housing and the Environment



# **Understanding SB 375:** Regional Planning for Transportation, Housing and the Environment

 **INSTITUTE FOR  
LOCAL GOVERNMENT**

LAND USE AND ENVIRONMENT PROGRAM  
PUBLIC ENGAGEMENT AND COLLABORATIVE GOVERNANCE PROGRAM

***The Institute for Local Government's mission is to promote good government at the local level with practical, impartial and easy-to-use resources for California communities.***

Check out the Institute's website ([www.ca-ilg.org](http://www.ca-ilg.org)) for resources in the following areas:

- Intergovernmental Conflict Resolution
- Local Government 101
- Public Engagement and Collaborative Governance
- Public Service Ethics
- Sustainable Communities:
  - Climate Change
  - Healthy Neighborhoods
  - Land Use and Environment

The Institute is the 501(c)(3) research affiliate of the California State Association of Counties and the League of California Cities.

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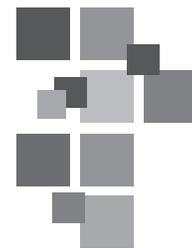
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A LAW CORPORATION

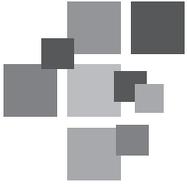
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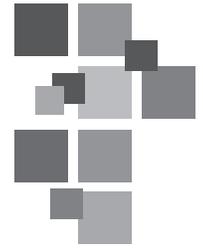
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### **INSTITUTE OFFERS SERIES OF GUIDES ON REGIONAL PLANNING**

This guide is one in a series developed by the Institute for Local Government (ILG) to assist local officials, residents, and others to understand the basic provisions of local and regional planning efforts to reduce greenhouse gas emissions in California.

ILG has prepared companion guides for local officials outlining the public participation requirements and opportunities that apply to regional planning. They are available, along with other regional planning resources, on the ILG website at [www.ca-ilg.org/RegionalPlanning](http://www.ca-ilg.org/RegionalPlanning).

To address in more detail legal issues specifically related to AB 32 and SB 375, the Institute has prepared two guides for local officials providing a legal analysis of AB 32 and SB 375, respectively. Both legal analyses are available at [www.ca-ilg.org/AB32-SB375LegalAnalysis](http://www.ca-ilg.org/AB32-SB375LegalAnalysis).



## Introduction

California’s population – estimated at 39 million in 2010 – is expected to grow to nearly 60 million people by the year 2050.<sup>1</sup> To help manage this growth and its associated challenges, cities and counties are participating more frequently and deeply in regional planning efforts. Local officials throughout California have developed a variety of collaborative processes to address the regional nature of many planning issues, such as improving air quality, meeting housing needs, and providing transportation networks.

Two recent laws, the Global Warming Solutions Act of 2006 (AB 32)<sup>2</sup> and the Sustainable Communities and Climate Protection Act of 2008 (SB 375)<sup>3</sup>, have important implications for the roles and responsibilities of local officials.

The purpose of this guide is to provide local officials with a concise introduction to regional planning for transportation, housing and the environment as revised by SB 375, including how regional planning relates to cities and counties in a region.

For local officials and others who are not familiar with the regional planning process, the guide offers an overview of the process and some of the issues central to regional planning for transportation and housing. For those with experience in regional planning as it has been conducted in the past, the guide describes how recent changes affect the processes for regional and local planning and environmental review.

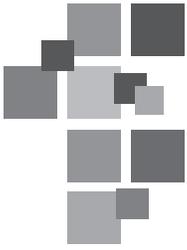
## Overview of SB 375

Senate Bill 375 creates a formal process that builds on the experience of voluntary regional visioning initiatives in California, often referred to as “Regional Blueprints.”<sup>4</sup> Furthering the goals of AB 32, SB 375 relies on regional collaboration by local officials to address California’s goals for reducing that portion of the emissions of greenhouse gases that stems from automobile travel. The law coordinates three important planning activities into a new integrated planning process:

- The regional transportation plan (RTP);
- The regional housing needs assessment (RHNA); and
- Updating the housing element of local general plans.

In addition, SB 375 modifies the process for environmental review of projects that are consistent with regional strategies to reduce greenhouse gas emissions.

Taken together, these changes provide important opportunities for local officials to engage with their colleagues and the public and proactively chart the pace and character of development in their region.



## Regional Planning Agencies and Organizations

Federal and state laws assign responsibility for development of regional plans for transportation and housing to one of three different types of regional agencies in California: regional transportation planning agencies (RTPAs), metropolitan planning organizations (MPOs), and regional councils of governments (COGs). Metropolitan planning organizations and councils of governments are “joint powers agencies” established by voluntary agreements among the cities and counties in the region. RTPAs are identified by statute (see below). These agencies are governed by boards composed of or appointed by local elected officials, with the exception that certain RTPA’s boards may include appointed representatives of local transit operators.<sup>5</sup>

### Regional Transportation Planning Agencies

The state’s Director of the Department of Transportation (Caltrans) designates the official regional transportation planning agency (RTPA) for each of California’s fifty-eight counties.<sup>6</sup>

- For some counties, the regional transportation planning agency is created by statute;<sup>7</sup>
- For counties within the jurisdiction of a metropolitan planning organization, that organization may serve as the regional transportation planning agency for a county;<sup>8</sup>
- For counties that are not within the jurisdiction of a metropolitan planning organization or a statutorily created regional transportation planning agency, a local transportation commission or county transportation commission may serve as the regional transportation planning agency.<sup>9</sup>

More information about the designation of regional transportation planning agencies is available on the Caltrans website at: [www.dot.ca.gov/hq/tpp/offices/orip/list/agencies.html](http://www.dot.ca.gov/hq/tpp/offices/orip/list/agencies.html).

### Metropolitan Planning Organizations

For urbanized areas with more than 50,000 residents, federal law<sup>10</sup> requires the state to designate a regional metropolitan planning organization in order to receive federal funding to prepare and implement the regional transportation plan. California has eighteen metropolitan planning organizations, each governed by elected officials from the cities and counties that comprise the particular metropolitan planning area.

Federal law provides a process and guidance for each state to define metropolitan planning areas by agreement between a metropolitan planning organization and the Governor.<sup>11</sup> These regions center on “urbanized” areas defined by the U.S. Census Bureau and may include additional areas beyond the urbanized area.

SB 375’s greenhouse gas reduction provisions affect only the eighteen metropolitan planning organizations in California and do not affect the non-metropolitan regional transportation planning agencies.<sup>12</sup> However, a number of provisions related to planning for housing are applicable to jurisdictions within metropolitan planning organizations and regional transportation planning agencies alike.<sup>13</sup>

## Councils of Governments

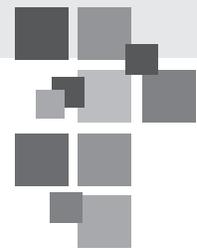
Councils of governments (COGs) are responsible for determining the share of the regional need for housing for each of the counties and cities within the council of government's region. Councils of governments can be single or multi-county entities created by a joint powers agreement among the member agencies. The governing board of each of California's 25 councils of governments consists of elected officials drawn from the cities and counties belonging to the council of governments, as established in the joint powers agreement for each agency.

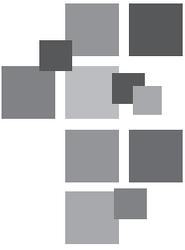
In most cases where the council of governments includes multiple counties, the council of governments and the metropolitan planning organization are the same organization; thus the council of government is also responsible for preparing the regional transportation plan and expenditure programs. An important exception is the nine-county San Francisco Bay Area, where by statute the Metropolitan Transportation Commission (MTC) serves as the metropolitan planning organization, and the Association of Bay Area Governments (ABAG) serves as the council of governments.<sup>14</sup>

## RESOURCES TO LEARN MORE ABOUT REGIONAL PLANNING AGENCIES

For more information about regional transportation planning agencies, metropolitan planning organizations, and councils of governments in California, including a map and list of regional agencies, please see the website of the California Association of Councils of Governments at [www.calcog.org/about/about.html](http://www.calcog.org/about/about.html).

More information about urbanized areas and federal guidelines for metropolitan planning organizations is available on the Federal Highway Administration FAQ page: [www.fhwa.dot.gov/planning/census/faq2cdt.htm](http://www.fhwa.dot.gov/planning/census/faq2cdt.htm).





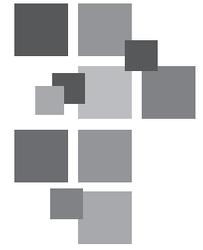
## What Roles Do Local Officials Play in Regional Planning?

Local officials are key decision-makers in many aspects of the regional planning process. Local elected officials from the cities and counties in a region govern the regional agencies involved in the process. Appointed officials and staff from cities and counties serve a number of roles in the process as well.

The roles of local officials in the regional planning process include:

- Local elected officials serve on the governing boards of the metropolitan planning organizations. The metropolitan planning organizations have final responsibility for adopting the regional transportation plan. This includes adopting the “sustainable communities strategy” prepared under SB 375 as part of the regional transportation plan (or the “alternative planning strategy”, if one is required).<sup>15</sup> (See the section on the sustainable communities strategy and alternative planning strategy beginning on page 11 for more information.)
- Local elected officials serve on the governing boards of the councils of governments that have final responsibility for approving the regional housing needs allocation to each city and county within the region.
- Local elected officials serving on city councils and county boards of supervisors are responsible for developing and adopting the local general plan. Neither the sustainable communities strategy nor the alternative planning strategy developed under SB 375 will supersede the general plan or other planning policies or authorities of a city or county. Nor must a local agency’s planning policies be consistent with either strategy.<sup>16</sup>
- Local city councils and county boards of supervisors will determine whether to make their local general plan consistent with the region’s sustainable communities strategy, thereby making California Environmental Quality Act streamlining incentives included in SB 375 available for residential development or transportation projects that are consistent with the sustainable communities strategy or alternative planning strategy.<sup>17</sup>

In addition, many local appointed officials and staff serve on advisory boards, committees, and task forces involved in the development of regional plans and policies for transportation and housing.



## Greenhouse Gas Reduction and Regional Planning

A key focus California's effort to reduce greenhouse gas emissions that contribute to climate change is transportation. Cars and light trucks account for about 30 percent of California's greenhouse gas emissions.<sup>18</sup> When all types of vehicles are included transportation overall accounts for 40 percent of California's greenhouse gas emissions.<sup>19</sup>

California laws seek to reduce carbon emissions from cars and light trucks in two ways.

**1. Emissions Reductions.** The first way is to reduce the amount of carbon that each vehicle emits, through measures like state standards for vehicle greenhouse gas emissions,<sup>20</sup> and the state's low carbon fuel standard.<sup>21</sup> These laws and regulations require vehicles to use less fuel and for fuel to use less carbon, respectively. (For more information, see the state's AB 32 Scoping Plan<sup>22</sup> at [www.ca-ilg.org/AB32ScopingPlan](http://www.ca-ilg.org/AB32ScopingPlan).)

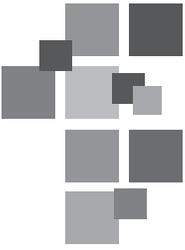
**2. Vehicle Trip Reductions.** The second way California laws seek to limit carbon emissions from cars and light trucks is to reduce the frequency and distance that people need to drive. SB 375 modifies the regional transportation planning and housing allocation processes with the goal of creating transportation networks and land use patterns where people will drive fewer miles in their cars.

Under SB 375, the California Air Resources Board (CARB) has set regional targets for reducing emissions from cars and light trucks for each of the eighteen metropolitan planning organizations in California.<sup>23</sup>

The approach to attain these emission reduction targets established by SB 375 includes three components:

- Modifying transportation patterns and investments at the regional level through the regional transportation plan;
- Linking land use, transportation, and housing decisions at the regional and local level through the regional housing needs assessment process and the housing element of the local general plan; and
- Providing incentives to streamline the environmental review of plans and projects that assist in meeting regional greenhouse gas reduction targets.

These three components of the regional and local planning process intended to reduce greenhouse gas emissions are described in the following sections.



## The Regional Transportation Plan

The regional transportation plan, sometimes called a metropolitan transportation plan, is a long-range framework for improvements to the region's transportation network. In particular, the regional transportation plan outlines transportation investments for a region, based on a minimum 20-year (or longer) outlook for likely growth in the region.

Major activities in the development of the regional transportation plan include:

- Developing a realistic long-range land use scenario for regional growth. The scenario must be based on current planning assumptions embodied in city and county general plans and spheres of influence within the region, along with likely economic and growth forecasts. (This requirement predates SB 375 and is linked to federal transportation planning requirements.<sup>24</sup>)
- Assessing the long-term mobility needs of the region, including the movement of both people and goods, and developing a plan to meet those needs.
- Developing short and long-range transportation goals, objectives and policy statements.

- Describing transportation projects proposed during the 20-year horizon of the plan.
- Identifying funding sources for implementing the plan.
- Developing a financial plan that covers costs related to development, maintenance, and operation of the transportation system.<sup>25</sup>

Taken together, these activities combine to create a framework for understanding the roles of different agencies and organizations involved in transportation planning, program management, and service delivery.

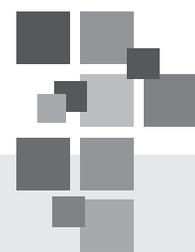
In each region, the metropolitan planning organization (sometimes referred to by its acronym MPO) or regional transportation planning agency (sometimes referred to by its acronym RTPA) develops the regional transportation plan every four years, and updates it after two years.

# Goals of Regional Transportation Planning

Regional transportation planning brings together cities, counties, transit providers, tribal governments, and a variety of other stakeholders and residents to develop a long-range plan for meeting the mobility needs of the region. The process develops a region's vision of its long-range transportation goals, objectives, and strategies. This vision must be realistic and within fiscal constraints. The regional transportation plan is the conduit for local, state, and federal funding to pay for transportation projects in the region and is a requirement of federal law. Broadly, federal law requires that the planning for regional transportation be "continuing, cooperative, and comprehensive" and consider all modes of transportation, such as cars, trucks, public transit, walking, and bicycling.<sup>26</sup>

Goals of regional transportation planning include:<sup>27</sup>

- Encouraging and promoting the safe and efficient management, operation and development of a regional intermodal transportation system that, when linked with appropriate land use planning, will improve the mobility of goods and people by providing more transportation choices, freedom of movement, and access to regional goods and services.
- Relieving traffic congestion and shortening commutes to allow people more time to do what they want or need to do, and increasing business productivity;
- Facilitating the efficient movement of goods to increase the region's economic strength and competitiveness;
- Improving public health by reducing exposure to air pollution and providing opportunities for residents to be physically active through walking and bicycling;
- Reducing greenhouse gas emissions in accordance with California law in the more urbanized regions of the state; and
- Furthering the attainment of the federal and state clean air acts and other laws related to the effects of transportation on public health, environmental protection, and resource management.



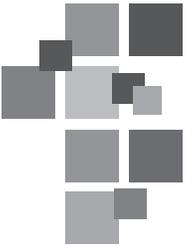
## Figure 1 AIR POLLUTION, PUBLIC HEALTH, AND THE REGIONAL TRANSPORTATION PLAN

Vehicle emissions can have serious effects on air quality and public health. Regional transportation planning agencies should consult with appropriate state and federal agencies on air quality issues during the preparation of the regional transportation plan. This consultation is mandatory for non-attainment regions.<sup>28</sup>

The regional transportation plan is also subject to the environmental review requirements of the California Environmental Quality Act (CEQA).<sup>29</sup> Generally, the regional agency prepares an environmental impact report in tandem with the regional transportation plan to identify and evaluate the full range of the plan's environmental impacts.

The regional transportation plan may also be subject to a process known as "conformity" if the region has not met health-based air quality standards under the federal Clean Air Act.<sup>30</sup> The conformity process requires the regional transportation plan to conform to the state implementation plan (SIP) adopted by the California Air Resources Board to meet federal air quality standards in the region (see Figure 3 on page 9 for more information).

A metropolitan planning organization or regional transportation planning agency makes the initial determination that its regional transportation plan is "in conformity" with the state implementation plan, subject to federal review.<sup>31</sup>



## Funding and Implementing Transportation Projects in the Regional Transportation Plan

California’s transportation system consists of a vast network of streets and highways, public transit (bus and passenger rail), airports and seaports as well as other transportation modes such as bicycle, pedestrian and ferry systems. These systems provide for the mobility and accessibility of people, goods, services and information throughout the state.

Jurisdiction over the operation and maintenance of these transportation systems is shared between the state, regional agencies, and local agencies. Funding comes from federal, state, regional and local taxes, bonds, fees and assessments, as well as private investments.

For more information on this topic, see *Transportation Funding in California*, available on the CalTrans website at: [www.dot.ca.gov/hq/tpp/offices/ote/fundchrt.html](http://www.dot.ca.gov/hq/tpp/offices/ote/fundchrt.html)

Regional transportation plans are the basis for funding transportation projects in California’s regions (see Figure 4 on page 10). Only projects included in these plans can be “programmed” for state or federal funding in the region’s transportation improvement program (sometimes referred to by its acronym TIP). The transportation improvement program identifies which projects will receive funding for environmental studies, right-of-way acquisition, project development, and construction.

Regional planning agencies update the transportation improvement program every two years. Both the RTP and the TIP are major elements of the region’s annual transportation work plan, called the “overall work plan.” The overall work plan outlines the transportation planning studies and tasks the regional agency will undertake in a given year.

Development and approval of the transportation improvement program is a multi-step process involving regional and inter-regional components. The California Transportation Commission must review and approve portions of the transportation improvement program that seek federal or state funding through the state transportation improvement program, or STIP. (The California Transportation Commission is responsible for programming and allocating funds for the construction of highway, passenger rail and transit improvements throughout California).<sup>32</sup>

Additionally, the regional transportation plan must be “financially constrained,” meaning that it needs to identify reasonably available funding sources for each of the transportation projects included in the plan.<sup>33</sup> Further, for the state’s 18 metropolitan planning organizations, programmed projects must be consistent with a sustainable communities strategy, which is also an element of the regional transportation plan.<sup>34</sup> Those areas outside the jurisdiction of a metropolitan planning organization are not subject to this requirement (see Figure 4 on page 10).

## Figure 2

### KEY REGIONAL TRANSPORTATION PLANNING RESOURCES AND DOCUMENTS

- Caltrans Office of Regional and Interagency Planning  
[www.dot.ca.gov/hq/tpp/offices/orip/index.html](http://www.dot.ca.gov/hq/tpp/offices/orip/index.html)
- Key planning documents produced by the metropolitan planning organizations (MPOs) and regional transportation planning agencies (RTPAs):
  1. **Regional Transportation Plan (RTP)** – Provides a 20 plus-year framework for future transportation investments within the region.
  2. **Transportation Improvement Program (TIP)** – A prioritized list of transportation projects proposed for federal and state funding over the

following four years. MPOs adopt and update the TIP every two years. The TIP must be consistent with the RTP and is a prerequisite for federal funding.

3. **Overall Work Program (OWP)** – MPOs and RTPAs adopt an “overall work program” annually to identify the region’s transportation funding priorities and planning activities for that fiscal year. The OWP is also referred to as a “unified planning work program.”

For more about these and other documents included in the regional transportation planning process, see the California Transportation Commission’s *2010 Regional Transportation Plan Guidelines* (especially section 2.4) at [www.catc.ca.gov/programs/rtp.htm](http://www.catc.ca.gov/programs/rtp.htm).

## Figure 3

### MORE ABOUT TRANSPORTATION PLANNING AND AIR QUALITY CONFORMITY

The federal Clean Air Act requires air quality in a region to meet a national standard called the National Ambient Air Quality Standard (sometimes referred to by the acronym NAAQS) set by the US Environmental Protection Agency (EPA). If the region fails to meet the standard, it must prepare a plan for attaining that goal. The air quality plan must include actions related to both stationary sources of air pollution (such as factories and power plants) and mobile sources of air pollution (from transportation).

Areas that have not met, or “attained,” the National Ambient Air Quality Standards, must implement a “transportation conformity” process. The conformity process requires a metropolitan planning organization to determine that its regional transportation plan is in conformity with the area’s plan for reaching “attainment” of the air quality standard.

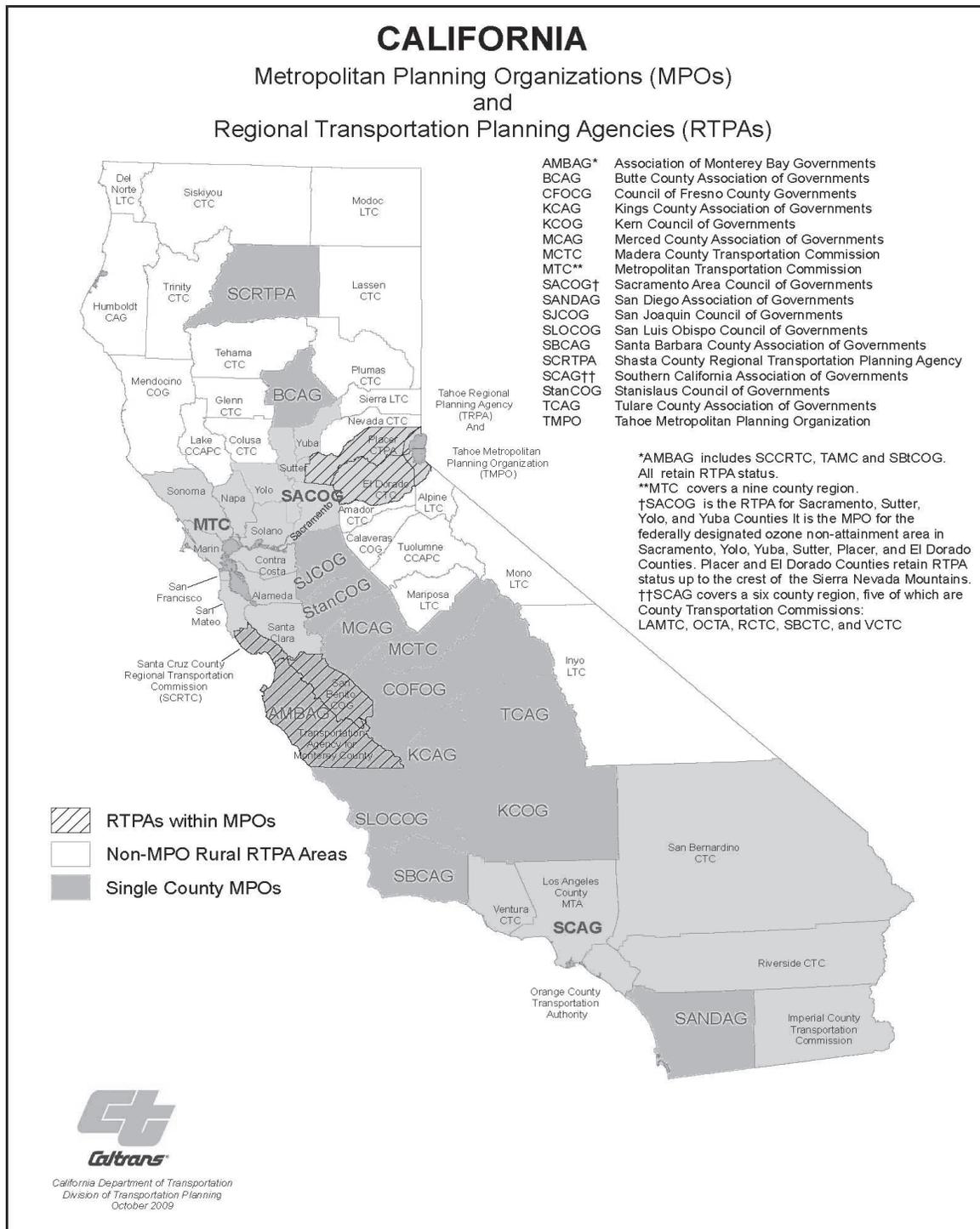
(See 23 C.F.R. § 450.322(l); 40 C.F.R § 93.104.)

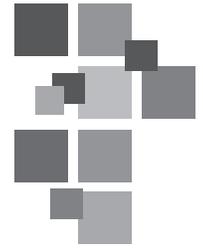
Following that initial determination, the US Department of Transportation’s Federal Highway Administration (FHWA) and Federal Transit Administration (FTA) must approve the metropolitan planning organization’s conformity determination before the regional transportation plan is valid.

The Environmental Protection Agency determines what pollutants are included in the NAAQS and sets the criteria for defining the standard. In 2009, the EPA began the process of including greenhouse gases on the list of regulated pollutants for which it will set air quality standards.

**Figure 4**

(Full color version available at [www.dot.ca.gov/hq/tpp/offices/orip/list/agencies.html](http://www.dot.ca.gov/hq/tpp/offices/orip/list/agencies.html))





## The Sustainable Communities Strategy – A New Component of the Regional Transportation Plan in Metropolitan Regions

In October 2010 the California Air Resources Board released regional greenhouse gas reduction targets to each of California’s 18 metropolitan planning organizations, setting in motion the process for each region to include a “sustainable communities strategy” (often referred to by its acronym SCS) as part of its next regional transportation plan update. This requirement does not apply to regional transportation planning agencies that are not within the jurisdiction of a metropolitan planning organization.

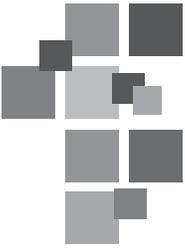
A sustainable communities strategy provides a regional framework for growth that identifies the “general location of uses, residential densities, and building intensities” within the region as well as areas sufficient to meet the region’s housing needs and a regional transportation network sufficient to serve that growth.<sup>35</sup>

The sustainable communities strategy identifies how the metropolitan planning organization proposes to reduce greenhouse gas emissions from cars and light trucks through integrated land use, transportation, and housing planning. The sustainable communities strategy must strive to meet regional greenhouse gas reduction targets set by the California Air Resources Board if there is a feasible way to do so.<sup>36</sup>

The sustainable communities strategy provides each region with a tool for synchronizing three state mandated planning processes:

- The Regional Transportation Plan (RTP);
- The Regional Housing Needs Allocation (RHNA); and
- Updating the housing element of the general plan for each city and county in the region.

In addition to aligning the schedules for each of these planning processes, SB 375 requires that all three share a common set of reasonable land use assumptions for the region. One such assumption, for example, would be the distribution of housing units established through the regional housing needs allocation (see below).<sup>37</sup> The sustainable communities strategy must identify areas sufficient to house all economic segments of the region’s population for an eight year planning period.<sup>38</sup>



### **Alternative Planning Strategy**

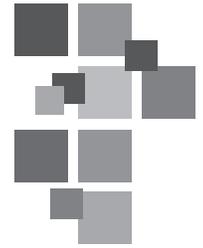
If the sustainable communities strategy falls short of meeting the regional greenhouse gas reduction target established by the Air Resources Board, then the region must also prepare an “alternative planning strategy” (sometimes referred to by its acronym APS).<sup>39</sup> The APS must include a combination of alternative development patterns, transportation investments, or additional transportation measures or policies that, if implemented, would meet the regional greenhouse gas reduction targets.<sup>40</sup>

Unlike the sustainable communities strategy, the alternative planning strategy is not part of the regional transportation plan. Thus, transportation funding decisions in the regional transportation plan do not have to be consistent with the alternative planning strategy, as they do with the sustainable communities strategy.

### **California Air Resources Board Review**

After adopting a sustainable communities strategy or alternative planning strategy, the metropolitan planning organization must submit it to the California Air Resources Board (CARB) for review. The statute limits the Air Resources Board’s review; the board can accept or reject the metropolitan planning organization’s assertion that the sustainable communities strategy or the alternative planning strategy would, if implemented, achieve the region’s greenhouse gas reduction target set by the board.<sup>41</sup>

If the Air Resources Board determines that the sustainable communities strategy would not meet the target, then the metropolitan planning organization must either revise the strategy, or submit an alternative planning strategy (if it has not already done so) that would meet the target.<sup>42</sup>



## Linking Transportation, Land Use and Housing

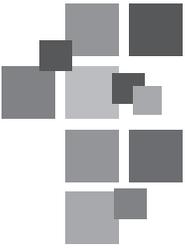
The sustainable communities strategy uses a common set of land use assumptions to link regional planning for transportation and housing with land use planning. These common assumptions apply to the regional transportation

plan and the allocation of each city's and county's share of the regional housing need. The housing share assigned to each locality is determined through the regional housing needs allocation (RHNA) process.

### **Figure 5 OBJECTIVES OF THE REGIONAL HOUSING NEEDS ALLOCATION**

Each locality's regional housing needs allocation is distributed among four income categories to address the required provision for planning for all income levels. The regional housing need allocation is required to promote the following objectives:<sup>43</sup>

1. Increase the housing supply and the mix of housing types, tenure and affordability in all cities and counties within the region in an equitable manner;
2. Promote infill development and socioeconomic equity, the protection of environmental and agricultural resources, and the encouragement of efficient development patterns; and
3. Promote an improved intraregional relationship between jobs and housing.



## Regional Housing Needs Allocation Process

The California Department of Housing and Community Development (sometimes referred to by its acronym HCD) is responsible for allocating each region's share of the statewide housing need to each council of governments. The region's share of the statewide housing need is based on state Department of Finance population projections and regional population forecasts used in preparing regional transportation plans.

The council of governments develops a regional housing need plan (RHNP) allocating the region's share of the statewide need to cities and counties within the region. The "regional housing need" is a minimum projection

of additional housing units needed to accommodate the projected growth in the number of households for all income levels by the end of the housing element's statutory planning period.

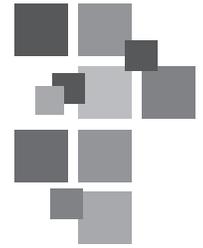
Each city and county is responsible for regularly updating the housing element of its general plan. The housing element of a city or county general plan must include goals and policies for how the locality will provide for its share of the regional housing need, including zoning and land use policies.<sup>44</sup> For example, to accommodate the regional housing need, cities and counties may include rezoning programs to allow higher density and more compact land uses.

### Figure 6

#### COORDINATING REGIONAL AND LOCAL PLANNING FOR HOUSING

The sustainable communities strategy influences regional and local planning for housing through a four-step process:

1. The state Department of Housing and Community Development (HCD), in consultation with each council of governments (COG), determines the projected housing needs for each region every eight years.<sup>45</sup>
2. Metropolitan planning organizations develop a sustainable communities strategy that accommodates the region's housing need and strives to meet the regional greenhouse gas reduction target set by the California Air Resources Board.<sup>46</sup>
3. The council of governments for the region then allocates a share of the regional housing need to each of the cities and counties in the region for the eight year planning period. The allocation must be "consistent with the development pattern included in the Sustainable Communities Strategy."<sup>47</sup>
4. The cities and counties then revise their general plan housing elements to accommodate their housing allocation. Housing elements must be updated within eighteen months of the date the metropolitan planning organizations adopts the regional transportation plan.



## Streamlining Environmental Review

Under SB 375, cities and counties have the option to provide incentives that “streamline” the environmental review process. These provisions apply to certain types of projects that are consistent with an adopted regional sustainable communities strategy or alternative planning strategy.<sup>48</sup>

The provisions for a full or partial exemption from the California Environmental Quality Act review were included in SB 375 as an incentive for projects designed to reduce greenhouse gas emissions from vehicle trips. Under that law, the environmental review of a variety of projects that are consistent with an adopted sustainable communities strategy or alternative planning strategy does not have to analyze certain aspects of the project that relate to climate change.<sup>49</sup>

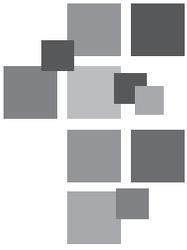
The environmental review provisions of SB 375 are detailed and complex. For more information on this topic, please visit the ILG website at [www.ca-ilg.org/SB375](http://www.ca-ilg.org/SB375).

## How Do These Regional Plans and Environmental Review Incentives Affect Local General Plans?

SB 375 specifically provides that cities and counties retain ultimate authority over local land use decisions.<sup>50</sup> Cities and counties need not amend or update their general plans to conform to the land use patterns included in the regional transportation plan and the sustainable communities strategy. However, because the regional transportation plan, the regional housing needs allocation, and the sustainable communities strategy are based on a common set of land use assumptions, these regional plans offer a collective vision for the region that may influence how local general plans evolve over time.

Three important ways regional planning for transportation and housing affects local general plans are:

- SB 375 synchronizes the schedules for updating the regional transportation plan, the regional housing needs allocation, and the update of the local general plan housing element into a new integrated planning cycle for each region.<sup>51</sup>
- The sustainable communities strategy included in the regional transportation plan uses a common set of land use assumptions for the regional transportation plan and the regional housing needs allocation, which will form the foundation for updating local housing elements.<sup>52</sup>



- The California Environmental Quality Act incentives included in SB 375 can only be used if the local agency and the metropolitan planning organization agree that a project (which must be consistent with the general plan) is also consistent with the regional sustainable communities strategy or alternative planning strategy.<sup>53</sup>

The sustainable communities strategy combines regional planning for transportation and housing into a strategy for reducing greenhouse gases in the region. To achieve the region's greenhouse gas reduction target, the sustainable communities strategy could include land use patterns that differ from those previously envisioned in the region. However, the assumptions used must be consistent with current planning assumptions for federal air conformity purposes—in other words, the assumptions must be grounded in what the local governments are reasonably likely to include in their plans and approve.<sup>54</sup>

Because all general plans must be internally consistent, other elements (such as land use and circulation) may need to be revised to reflect the land use assumptions contained in the updated housing element.<sup>55</sup> In addition, local jurisdictions may decide to amend their general plans for consistency with the sustainable communities strategy to help streamline the environmental review of development projects.

## Involving the Public in Regional Planning

The success of California's effort to reduce greenhouse gas emissions through coordinated regional planning will depend in large part on the extent of public support for the proposed changes to land use, transportation, and housing patterns included in local and regional plans. Public support in turn requires that the public be informed, consulted, engaged and heard as officials make decisions about the future of their communities through the regional planning process.

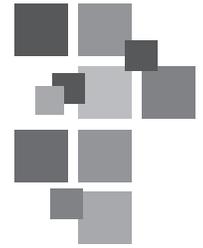
Local officials can play a leadership role by encouraging their constituents and other members of the public to actively participate in regional planning and by taking advantage of opportunities to engage in that planning process themselves.

### **ILG OFFERS RESOURCES ON PUBLIC PARTICIPATION IN REGIONAL PLANNING**

The Institute for Local Government has prepared two guides for local officials on engaging the public in regional planning.

- Understanding SB 375: Public Participation Requirements
- Understanding SB 375: Opportunities to Engage the Public in Regional Planning

For more information on this topic, including a free electronic copy of these publications, please visit the ILG website at [www.ca-ilg.org/RegionalPlanning](http://www.ca-ilg.org/RegionalPlanning).



## Additional Resources and References

### Online Glossaries

These online glossaries provide more information about terms related to the regional planning issues discussed in this guide, and others:

- Federal Highway Administration online glossary: [www.fhwa.dot.gov/planning/glossary/index.cfm](http://www.fhwa.dot.gov/planning/glossary/index.cfm)
- ILG Glossary of Land Use Planning Terms: [www.ca-ilg.org/PlanningTerms](http://www.ca-ilg.org/PlanningTerms)
- ILG SB 375 Legal Analysis: [www.ca-ilg.org/SB375LegalAnalysis](http://www.ca-ilg.org/SB375LegalAnalysis)

### Key Acronyms in this Document

- APS – alternative planning strategy
- CARB – California Air Resources Board
- CEQA – California Environmental Quality Act
- COG – council of governments
- Caltrans – California Department of Transportation
- FTIP – Federal Transportation Improvement Program (also referred to as the regional transportation improvement program or RTIP)
- HCD – California Department of Housing and Community Development
- MPO – metropolitan planning organization
- OWP – overall work program (also referred to as UPWP – unified planning work program)
- RHNA – regional housing needs allocation
- RTP – regional transportation plan (sometimes referred to as MTP – metropolitan transportation plan)
- RTPA – regional transportation planning agency
- SCS – sustainable communities strategy

# Endnotes

- <sup>1</sup> State of California, Department of Finance, Population Projections for California and Its Counties 2000-2050, by Age, Gender and Race/Ethnicity, Sacramento, California, July 2007.
- <sup>2</sup> See California Health and Safety Code, § 38500 et. seq.
- <sup>3</sup> SB 375 (Steinberg, Chapter 728, Statutes of 2008).
- <sup>4</sup> According to the California Department of Transportation, regional blueprints are “collaborative planning processes that engage residents of a region in articulating a vision for the long term future of their region. ....The process leads to the development of alternative growth scenarios for the region, and through a public process a preferred growth scenario is selected that can then guide regional and local land use and transportation decisions for a future that is sustainable, while meeting residents’ needs and providing a high quality of life for all.” See <http://calblueprint.dot.ca.gov/>.
- <sup>5</sup> See California Government Code, § 29535.
- <sup>6</sup> See California Government Code, § 29532, et. seq.
- <sup>7</sup> See California Government Code, § 29532.1.
- <sup>8</sup> See California Government Code, § 29532 (b).
- <sup>9</sup> See California Government Code, § 29532 (b) and (c).
- <sup>10</sup> 23 USC 134(d).
- <sup>11</sup> 23 USC 134(e).
- <sup>12</sup> California State Association of Counties (CSAC), *Addressing Greenhouse Gas Emissions from the Transportation Sector via Regional Transportation Plans* (October 21, 2008), p. 5 (available at [www.ca-ilg.org/](http://www.ca-ilg.org/)).
- <sup>13</sup> CSAC, p. 9-11.
- <sup>14</sup> See California Government Code, § 29532.1 (a).
- <sup>15</sup> See California Government Code, § 65080(b)(2)(B).
- <sup>16</sup> See California Government Code, § 65080(b)(2)(J).
- <sup>17</sup> See Cal. Public Resources Code §§ 21155, 21155.1, 21155.2, and 21155.3.
- <sup>18</sup> CSAC.
- <sup>19</sup> CSAC.
- <sup>20</sup> See Cal. Health and Safety Code § 43018.5. For additional information about California’s Clean Cars Program, see also [http://www.arb.ca.gov/msprog/clean\\_cars/clean\\_cars.htm](http://www.arb.ca.gov/msprog/clean_cars/clean_cars.htm).
- <sup>21</sup> See Governor’s Executive Order S-01-07. For additional information about California’s Low Carbon Fuel Standard, see also <http://www.arb.ca.gov/fuels/lcfs/lcfs.htm>.
- <sup>22</sup> See Cal. Health and Safety Code § 38561. For additional information about the AB 32 Scoping Plan and its development, see also <http://www.arb.ca.gov/cc/scopingplan/scopingplan.htm>
- <sup>23</sup> See Cal. Gov’t Code § 65080(b)(2)(A).
- <sup>24</sup> See 23 CFR 450.322 (c) and (e)
- <sup>25</sup> For a detailed discussion of the goals of the regional transportation planning process, please see California Transportation Commission (CTC), *2010 California Regional Transportation Plan Guidelines* (Adopted April 7, 2010), § 1 (available at <http://www.dot.ca.gov/hq/tpp/offices/orip/rtp/index.html>).
- <sup>26</sup> See 23 USC 134(c)(3).
- <sup>27</sup> For a detailed discussion of the goals of the regional transportation planning process, please see California Transportation Commission (CTC), *2010 California Regional Transportation Plan Guidelines* (Adopted April 7, 2010), § 1 (available at <http://www.dot.ca.gov/hq/tpp/offices/orip/rtp/index.html>).
- <sup>28</sup> See Title 40, Code of Federal Regulations, § 93.105 and § 93.113 (40 CFR 93). For additional discussion of consultation requirements, please see California Transportation Commission (CTC), *2010 California Regional Transportation Plan Guidelines* (Adopted April 7, 2010), § 5.7, page 90, and § 2 more generally. (available at <http://www.dot.ca.gov/hq/tpp/offices/orip/rtp/index.html>).
- <sup>29</sup> See California Transportation Commission (CTC), *2010 California Regional Transportation Plan Guidelines* (Adopted April 7, 2010), § 5. (available at <http://www.dot.ca.gov/hq/tpp/offices/orip/rtp/index.html>).
- <sup>30</sup> See Title 40, Code of Federal Regulations, § 93 (40 CFR 93).
- <sup>31</sup> See Title 40, Code of Federal Regulations, § 93.104 (40 CFR 93) and Title 23 Code of Federal Regulations § 450.322(l). For additional discussion of roles and responsibilities related to the conformity process, please see U.S. Department of Transportation, Federal Highway Administration (FHWA), *Transportation Conformity: A Basic Guide for State and Local Officials* (available at [http://www.fhwa.dot.gov/environment/air\\_quality/conformity/guide/guide06.cfm](http://www.fhwa.dot.gov/environment/air_quality/conformity/guide/guide06.cfm))

<sup>32</sup> See California Transportation Commission website at <http://www.catc.ca.gov/>.

<sup>55</sup> See *Federation of Hillside and Canyon Associations v. City of Los Angeles*, 126 Cal. App. 4th 1180, 24 Cal. Rptr. 3d 543 (2004).

<sup>33</sup> See Title 23, Code of Federal Regulations, § 450.322 (23 CFR 450), Cal. Government Code Section 65080(b)(4). For additional discussion *please see* California Transportation Commission (CTC), *2010 California Regional Transportation Plan Guidelines* (Adopted April 7, 2010), § 6.3 (available at <http://www.dot.ca.gov/hq/tpp/offices/orip/rtp/index.html>).

<sup>34</sup> See Cal. Government Code Section 65080(b)(2)(B).

<sup>35</sup> See California Government Code, § 65080(b)(2)(B)(i).

<sup>36</sup> See Cal. Gov't Code § 65080(b)(2)(B)(vii).

<sup>37</sup> See California Government Code, § 65080(b)(2)(B).

<sup>38</sup> See California Government Code, § 65080(b)(2)(B)(iii).

<sup>39</sup> See Cal. Gov't Code § 65080(b)(2)(H) and 65050(b)(2)(I).

<sup>40</sup> See California Government Code, § 65080(b)(2)(I).

<sup>41</sup> See California Government Code, § 65080(b)(2)(J)(ii).

<sup>42</sup> See Cal. Gov't Code § 65080(b)(2)(j)(iii).

<sup>43</sup> See Cal. Government Code Section 65584(d).

<sup>44</sup> Cal. Gov't Code § 65583 et seq.

<sup>45</sup> See Cal. Gov't Code § 65584(b).

<sup>46</sup> See Cal. Gov't Code § 65080(b)(2).

<sup>47</sup> See Cal. Gov't Code § 65584.04(i)(1).

<sup>48</sup> See Cal. Gov't Code § 65080(b)(2)(J)(ii).

<sup>49</sup> See Cal. Pub. Res. Code §§ 21155, 21155.1, 21155.2, and 21155.3.

<sup>50</sup> A sustainable communities strategy and alternative planning strategy does not regulate the use of land. See Cal. Gov't Code § 65080(b)(2)(J).

<sup>51</sup> See *Understanding SB 375: A Local Official's Guide*, Institute for Local Government, November 2010, p. 20.

<sup>52</sup> See Cal. Gov't Code § 65080(b)(2).

<sup>53</sup> See Cal. Pub. Res. Code § 21155(a).

<sup>54</sup> See Cal. Gov't Code § 65080(b)(2)(B) and 40 C.F.R. § 93.110.

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## **Appendix B**

Letter from Department of Housing and Community Development dated September 10, 2021.

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

2020 W. El Camino Avenue, Suite 500  
Sacramento, CA 95833  
(916) 263-2911 / FAX (916) 263-7453  
[www.hcd.ca.gov](http://www.hcd.ca.gov)



September 10, 2021

Mary Gilbert, Executive Director  
Council of San Benito County Governments  
330 Tres Pinos Rd, Suite C7  
Hollister CA 95023

Dear Mary Gilbert:

**RE: Final Regional Housing Need Determination**

This letter provides the Council of San Benito County Governments (SBCOG) with its Final Regional Housing Need Determination. Pursuant to state housing element law (Government Code section 65584, et seq.), the Department of Housing and Community Development (HCD) is required to provide the determination of SBCOG's existing and projected housing need. In assessing SBCOG's regional housing need, HCD and SBCOG staff completed a consultation process from March 2019 through August 2021 that included the methodology, data sources, and timeline for HCD's determination of the Regional Housing Need. To inform this process, HCD also consulted with Walter Schwarm and Doug Kuczynski of the California Department of Finance (DOF) Demographic Research Unit.

Attachment 1 displays the minimum regional housing need determination of **5,005** total units across four income categories. SBCOG is to distribute amongst the region's local governments. Attachment 2 explains the methodology applied pursuant to Government Code section 65584.01. In determining SBCOG's housing need, HCD considered all the information specified in state housing law (Government Code section 65584.01(c)).

SBCOG is responsible for adopting a methodology for RHNA and RHNA Plan for the projection period beginning June 30, 2023 and ending December 15, 2031. Pursuant to Government Code section 65584(d), the methodology to prepare SBCOG's RHNA plan must further the following objectives:

- (1) Increasing the housing supply and mix of housing types, tenure, and affordability.
- (2) Promoting infill development and socioeconomic equity, protecting environmental and agricultural resources, and encouraging efficient development patterns
- (3) Promoting an improved intraregional relationship between jobs and housing
- (4) Balancing disproportionate household income distributions
- (5) Affirmatively furthering fair housing

Pursuant to Government Code section 65584.04(d), to the extent data is available, SBCOG shall include the factors listed in Government Code section 65584.04(d)(1-13) to develop its RHNA plan. Also, pursuant to Government Code section 65584.04(f), SBCOG must explain in writing how each of these factors was incorporated into the RHNA plan methodology and how the methodology furthers the statutory objectives described above.

HCD encourages SBCOG's jurisdictions to consider the many other affordable housing and community development resources available to local governments. HCD's programs can be found at <https://www.hcd.ca.gov/grants-funding/nofas.shtml>.

HCD commends SBCOG leadership in fulfilling their important role in advancing the state's housing, transportation, and environmental goals. HCD looks forward to continued partnership with SBCOG and member jurisdictions and assisting SBCOG in planning efforts to accommodate the region's share of housing need.

If HCD can provide any additional assistance, or if you, or your staff, have any questions, please contact Tom Brinkhuis, Senior Housing Policy Specialist at (916) 776-7707 or [tom.brinkhuis@hcd.ca.gov](mailto:tom.brinkhuis@hcd.ca.gov).

Sincerely,



Tyrone Buckley  
Assistant Deputy Director of Fair Housing

Enclosures

## ATTACHMENT 1

### HCD REGIONAL HOUSING NEED DETERMINATION SBCOG: June 30, 2023 through December 15, 2031

<u>Income Category</u>	<u>Percent</u>	<u>Housing Unit Need</u>
Very-Low*	22.2%	1,110
Low	17.8%	890
Moderate	18.9%	947
Above-Moderate	41.1%	2,058
<b>Total</b>	<b>100.0%</b>	<b>5,005</b>

\* Extremely-Low 10.3% Included in Very-Low Category

Income Distribution:

*Income categories are prescribed by California Health and Safety Code (Section 50093, et. seq.). Percents are derived based on Census/ACS reported household income brackets and county median income.*

## ATTACHMENT 2

### HCD REGIONAL HOUSING NEED DETERMINATION: June 30, 2023 through December 15, 2031

#### Methodology

<b>SBCOG: PROJECTION PERIOD (8.5 years)</b>		
<b>HCD Determined Population, Households, &amp; Housing Unit Need</b>		
Reference No.	Step Taken to Calculate Regional Housing Need	Amount
1.	<b>Population: December 31 (SBCOG June 30 2031 projection adjusted + 5.5 months to December 15, 2031)</b>	74,904
2.	<i>- Group Quarters Population: December 31 (SBCOG June 30 2031 projection adjusted + 5.5 months to December 15, 2031)</i>	-480
3.	<b>Household (HH) Population</b>	
4.	<b>Projected Households</b>	22,932
5.	+ Vacancy Adjustment (4.21%)	+966
6.	+ Overcrowding Adjustment (2.95%)	+677
7.	+ Replacement Adjustment (.5%)	+115
8.	<i>- Occupied Units (HHs) estimated June 30, 2023</i>	-20,115
9.	+ Cost-burden Adjustment	+430
<b>Total</b>	<b>6<sup>th</sup> Cycle Regional Housing Need Assessment (RHNA)</b>	5,005

Detailed background data for this chart available upon request.

#### Explanation and Data Sources

- 1-4. Population, Group Quarters, Household Population, & Projected Households: Pursuant to Gov. Code Section 65584.01, projections were extrapolated from DOF projections. Population reflects total persons. Group Quarter Population reflects persons in a dormitory, group home, institute, military, etc. that do not require residential housing. Household Population reflects persons requiring residential housing. Projected Households reflect the propensity of persons within the Household Population to form households at different rates based on American Community Survey (ACS) trends.
5. Vacancy Adjustment: HCD applies a vacancy adjustment based on the difference between a standard 5% vacancy rate and region's current "for rent and sale" vacancy percentage to determine healthy market vacancies to facilitate housing availability and resident mobility. The adjustment is the difference between standard 5% vacancy rate and region's current vacancy rate (.79%) is based on the 2015-2019 ACS data. For SBCOG that difference is **4.21%**.
6. Overcrowding Adjustment: In regions where overcrowding is greater than the comparable region's overcrowding rate, provided by SBCOG, HCD applies an adjustment based on the amount the region's overcrowding rate exceeds the comparable region's. Data is from the 2015-2019 ACS. For SBCOG, the region's overcrowding rate (**7.65%**) is higher than the comparable region's average rate (**4.70%**), resulting in a **2.95%** adjustment.
7. Replacement Adjustment: HCD applies a replacement adjustment from between .5% and 5% to the total housing stock based on the current 10-year average of demolitions in the region's local government annual reports to Department of Finance

(DOF). For SBCOG the 10-year average is **.34%**, therefore a minimum **.5%** adjustment was applied.

8. Occupied Units: This figure reflects DOF's estimate of occupied units at the start of the projection period (June 30, 2023).
9. Cost Burden Adjustment: HCD applies an adjustment to the projected need by comparing the difference in cost-burden by income group for the region to the cost-burden by income group for the nation. The cost burden rate for lower income households is **11.8%** higher than the cost burden rate for the nation, resulting in a **211** unit increase to the lower income RHNA. The cost burden rate for moderate and above moderate-income households is **7.85%** higher than the cost burden rate for the nation, resulting in a **219** unit increase to the moderate and above moderate RHNA.

## Appendix C

In summer 2021, PRB conducted the statutorily mandated survey of jurisdictions. Responses to this survey helped inform the RHNA Plan.

<i>Date</i>	8/3/21	8/16/21	8/13/21
<i>Jurisdiction</i>	San Benito County	Hollister	San Juan Bautista
<i>Name</i>	Robin Bolster-Grant	Abraham Prado	Donald Reynolds
<i>Email</i>	rbolster-grant@cosb.us	abraham.prado@hollister.ca.gov	citymanager@san-juan-bautista.ca.us
<i>Factor 1. Your jurisdiction's existing and projected jobs and housing relationship, particularly low-wage jobs and affordable housing. AMBAG/SBtCOG will compile data for all jurisdictions from sources including the U. S. Census Bureau, California Employment Development Department, and others. Are there any jobs/housing issues that AMBAG/SBtCOG should consider for your jurisdiction in addition to that data?</i>			
	Regionally consistent data is sufficient	A large population of the residents of the City of Hollister commute out of town such as to Santa Clara, Monterey, and Santa Cruz Counties to work. The City is working on the creation of jobs in Hollister.	local jobs/housing balance, Industrial land uses are currently vacant, but now have infrastructure
<i>Factor 2. The opportunities and constraints to development of additional housing in your jurisdiction, including all of the following: Which of the following opportunities and constraints to development of additional housing are relevant for your jurisdiction? (Check all that apply. )</i>			
<i>a. The availability of sewer and water service given 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</i>	Y		

<i>necessary infrastructure for additional development during the planning period.</i>			
<i>b. The availability of land suitable for urban development or for conversion to residential use, the availability of underutilized land, and opportunities for infill development and increased residential densities. (The council of governments may not limit its consideration of suitable housing sites or land suitable for urban development to existing zoning ordinances and land use restrictions of a locality but shall consider the potential for increased residential development under alternative zoning ordinances and land use restrictions. )</i>	Y		Y
<i>c. Lands preserved or protected from urban development under existing federal or state programs, or both, designed to protect open space, farmland, environmental habitats, and natural resources on a long-term basis.</i>	Y		
<i>d. County policies to preserve prime agricultural land, as defined pursuant to Section 56064, within an unincorporated area.</i>	Y		
<i>None of the above</i>		Y	

<p><i>If you checked any of the constraints above, please describe the constraint(s)</i></p>	<p>Increasingly, the City of Hollister is unable to authorize service extensions to unincorporated San Benito County, particularly regarding sewer service, due to capacity issues. Additionally, at least two existing sewage treatment plants in the unincorporated County are failing and are in some jeopardy of violating State Water Resource Board requirements. San Benito County has few opportunities for infill, given the lack of water and sewer availability as well as limited transportation corridors. The vast majority of land in unincorporated San Benito County (&gt;75-80%) is devoted to agricultural production or grazing. Large areas of the County are encumbered by Williamson Act contracts and/or open space easements that preclude conversion and the majority of such agricultural</p>		<p>Limited opportunities and vacant land available for residential uses within the current city limits.</p>
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	lands are defined as prime agricultural land. Additionally, the undeveloped portion of San Benito County is home to multiple listed plant and animal species and is claimed as tribal land by several federally recognized tribal bands		
<p><i>Factor 3: The distribution of household growth assumed for purposes of a comparable period of regional transportation plans and opportunities to maximize the use of public transportation and existing transportation infrastructure. The MTP/SCS land use pattern will form the basis for the total RHNA calculation. The land use pattern is developed in tandem with a series of transportation investments in an effort to ensure past and future transportation investments are maximized. Since the MTP/SCS considers this factor, additional jurisdiction input is not necessary.</i></p>			
	n/a	The City of Hollister is a smaller size City compared to San Jose to the north.	n/a
<p><i>Factor 4: Agreements between a county and cities in a county to direct growth toward incorporated areas of the county. Does your jurisdiction have any agreements in place?</i></p>			
	No	No	No
<p><i>Factor 5: The loss of units contained in assisted housing developments, as defined in paragraph (9) of subdivision (a) of Section 65583 that changed to non-low-income use through mortgage prepayment, subsidy contract expirations, or termination of use restrictions. Does your jurisdiction have any unit loss that needs to be considered?</i></p>			

	No	No	No
<i>Factor 6: High-housing costs burdens. The percentages of existing households at each of the income levels listed in subdivision (f) of Section 65584 that are paying more than 30 percent and more than 50 percent of their income in rent. AMBAG/SBtCOG will compile data for all jurisdictions from sources including the U. S. Census Bureau. Are there any housing cost issues that AMBAG/SBtCOG should consider for your jurisdiction in addition to that data?</i>			
	Regionally consistent data is sufficient	Regionally consistent data is sufficient	Price and rent are extremely high driven by influences outside the AMBAG region
<i>Factor 7: The Rate of Overcrowding. AMBAG/SBtCOG will compile data for all jurisdictions from sources including the U. S. Census Bureau. Are there any overcrowding issues that AMBAG/SBtCOG should consider for your jurisdiction in addition to that data?</i>			
	Regionally consistent data is sufficient	The current Housing Element speaks to issues with overcrowding in the City of Hollister.	Regionally consistent data is sufficient
<i>Factor 8: The housing needs of farmworkers. 8a. Is there existing farmworker housing in your jurisdiction?</i>			
	Yes	Yes	No
<i>8b. Where do you think additional farmworker housing is most needed?</i>			
		Farmworker housing would be needed in the City of Hollister.	Where services and public transportation are available.
<i>Factor 9: The housing needs generated by the presence of a private university or a campus of the California State University or the University of California within any member jurisdiction. Do you have a college or university in your jurisdiction that needs to be considered? If yes, please describe housing need/plans:</i>			
	No	No	No
<i>Factor 10: The housing needs of individuals and families experiencing homelessness. Does your jurisdiction have housing needs for those experiencing homelessness? If yes, please describe housing need/plans:</i>			
	No	There is currently a building designated for	No

		people who are experiencing homelessness in the City's jurisdiction.	
<p><i>Factor 11: The loss of units during a state of emergency that was declared by the Governor pursuant to the California Emergency Services Act (Chapter 7 (commencing with Section 8550) of Division 1 of Title 2), during the planning period immediately preceding the relevant revision pursuant to Section 65588 that have yet to be rebuilt or replaced at the time of the analysis. Does your jurisdiction have any unit loss that needs to be considered? If yes, please provide the number of units that have yet to be rebuilt/replaced.</i></p>			
	No	No	No
<p><i>Factor 12: Greenhouse gas emissions targets. The region's greenhouse gas emissions targets provided by the State Air Resources Board pursuant to Section 65080. What land use policies or strategies has your jurisdiction implemented to minimize GHG emissions? Are AB32 standards implemented? The location and type of housing can play a key role in meeting State and regional targets to reduce greenhouse gas (GHG) emissions. What land use policies or strategies has your jurisdiction implemented to minimize GHG emissions? (Check all that apply. )</i></p>			
<i>Energy efficiency standards in new construction or retrofits</i>	Y	Y	Y
<i>Investment in pedestrian, bicycle, and active transportation infrastructure</i>			Y
<i>Investment in maintaining or improving existing public transportation infrastructure</i>			
<i>Land use changes that encourage a diversity of housing types and/or mixed-use development</i>		Y	Y
<i>Land use changes to allow greater density near transit,</i>			
<i>Incentives or policies to encourage housing development on vacant or underutilized land near transit</i>		Y	
<i>Changes to parking requirements for new residential and/or commercial construction</i>			
<i>Implementing a Climate Action Plan</i>	Y		

<i>None of the above</i>			
<i>Other (please specify)</i>		The City of Hollister is currently updating its general plan and as part of the update of the general plan, the City will prepare a Climate Action Plan.	ADU ordinance
<i>Factor 13: Other factors adopted by AMBAG/SBtCOG that further or at minimum do not conflict with statutory objectives. Are there any additional factors that you would recommend considering? Use the space below to describe. (If no suggestions, you may leave this space blank. )</i>			
			The State trend to remove land use control from local jurisdictions
<i>Please provide any additional feedback (issues not already covered in the 12 factors above) that AMBAG/SBtCOG should consider for your jurisdiction pursuant to the five RHNA objectives defined in Government Code Section 65584(a). Please provide as much detail as possible.</i>			
<b><i>San Benito County Affirmatively Furthering Fair Housing (AFFH) Survey</i></b>			
<i>Jurisdiction</i>	San Benito County	Hollister	San Juan Bautista
<i>1. When did your jurisdiction last update the General Plan? (Please list the year)</i>			
	2015	The City of Hollister last updated its General Plan in 2005 for its 2005 - 2023 general plan. The City of Hollister is currently in the process of	2016

		updating its general plan.	
<i>2. Does your jurisdiction have an Analysis of Impediments to Fair Housing Choice or an Assessment of Fair Housing due to U. S. Department of Housing and Urban Development (HUD) requirements?</i>			
	No	No	No
<i>3a. Does your General Plan have an environmental justice/social equity chapter or integrate environmental justice/social equity, per SB 1000?</i>			
	Yes	The City of Hollister is currently in the process of updating its general plan. The City is hoping to have a draft general plan update and draft EIR for review in spring of 2022 and an updated general plan by the fall of 2022.	No
<i>3b. If you answered yes or in process to question 3a, how does your General Plan integrate or plan to integrate environmental justice? (Check all that apply. )</i>			
<i>An environmental justice chapter</i>		Y	
<i>Throughout the General Plan in each chapter</i>			
<i>None of the above</i>			Y
<i>Other (please specify)</i>	Development Review and Decision making process Goals within the Administration Element		

<p><i>4a. Describe demographic trends and patterns in your jurisdiction over the past ten years.</i></p>	<p>Population increases in San Benito County has outpaced other counties in the region; largely as a result of housing costs in Santa Clara County to the north. However, the population growth has occurred predominately in the City of Hollister due to the constraints referenced previously in this questionnaire. The employment growth has lagged dramatically behind the population growth as the majority of residents work in Santa Clara County.</p>	<p>The City of Hollister had little growth from 2010 to approximately 2014 due to the local and state economic recession. The City then began growing with residential dwelling units and met and surpassed its current above moderate RHNA numbers.</p>	<p>1.3% growth</p>
<p><i>4b. Do any demographic groups experience disproportionate housing needs?</i></p>	<p>No</p>	<p>No</p>	<p>Single Parent Head of households. Senior households. 60 total households live in crowded conditions, 87 percent of low income households are renters. Additional multifamily at affordable rents for low income workers in the area.</p>
<p><i>5. To what extent do the following factors impact your jurisdiction by contributing to segregated housing patterns or racially or ethnically-concentrated areas of poverty?</i></p>			
<p><i>Land use and zoning laws, such as minimum lot sizes, limits on multi-unit properties, height</i></p>	<p>Somewhat / Occasionally</p>	<p>Not at All</p>	<p>Somewhat / Occasionally</p>

<i>limits, or minimum parking requirements</i>			
<i>Occupancy restrictions</i>	N/A or Unknown	N/A or Unknown	Somewhat / Occasionally
<i>Residential real estate steerings</i>	N/A or Unknown	N/A or Unknown	Somewhat / Occasionally
<i>Patterns of community opposition</i>	Somewhat / Occasionally	Somewhat / Occasionally	Very Much / Often
<i>Economic pressures, such as increased rents or land and development costs</i>	Very Much / Often	N/A or Unknown	Very Much / Often
<i>Major private investments</i>	N/A or Unknown	N/A or Unknown	Somewhat / Occasionally
<i>Municipal or State services and amenities</i>	Somewhat / Occasionally	N/A or Unknown	Somewhat / Occasionally
<i>Foreclosure patterns</i>	N/A or Unknown	Somewhat / Occasionally	N/A or Unknown
<i>Other (please specify)</i>			Lack of land available for development within the city boundaries
<i>6. To what extent do the following act as determinants for fair housing and compliance issues in your jurisdiction?</i>			
<i>Unresolved violations of fair housing or civil rights laws</i>	Somewhat / Occasionally	N/A or Unknown	N/A or Unknown
<i>Patterns of community opposition</i>	Somewhat / Occasionally	N/A or Unknown	Somewhat / Occasionally
<i>Support or opposition from public officials</i>	Somewhat / Occasionally	N/A or Unknown	N/A or Unknown
<i>Discrimination in the housing market</i>	Somewhat / Occasionally	N/A or Unknown	N/A or Unknown
<i>Lack of fair housing education</i>	Somewhat / Occasionally	N/A or Unknown	N/A or Unknown
<i>Lack of resources for fair housing agencies and organizations</i>	Very Much / Often	N/A or Unknown	N/A or Unknown
<i>Other (please specify)</i>			
<i>7. Which of the following are your public outreach strategies to reach disadvantaged communities? (Check all that apply. )</i>			

<i>Partnership with advocacy/non-profit organizations</i>	Y	Y	Y
<i>Partnership with schools</i>			
<i>Partnership with health institutions</i>			
<i>Variety of venues to hold community meetings</i>	Y	Y	
<i>Door-to-door interaction</i>			Y
<i>Increased mobile phone app engagement</i>			
<i>Social media or other online engagement</i>		Y	Y
<i>None of the above</i>			
<i>Other (please specify)</i>			
<i>8. What steps has your jurisdiction undertaken to overcome historical patterns of segregation or remove barriers to equal housing opportunity?</i>	Revisions to the County's Affordable Housing Ordinance are contemplated, which would reduce developer reliance on in-lieu fees in favor of increasing the number of affordable units constructed on site.	The City follows equal housing opportunity law.	none
<i>9. What steps has your jurisdiction undertaken to avoid, minimize, or mitigate the displacement of low income households?</i>	Revisions to the County's Inclusionary Housing requirements	The City of Hollister is committed to support and maintain low income housing for low income households. During the process of the update of the general plan the City Council has expressed the need for an inclusionary zoning	none

		ordinance for the support and development of affordable housing in the community.	
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