

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

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June 27, 2012

Ms. Wendy Tyler
County Administrative Officer
County of Trinity
P.O. Box 1613
Weaverville, CA 96093-1613

Dear Ms. Tyler:

RE: Regional Housing Need Determination and Plan for the Fifth Housing Element Update

This letter transmits the Department's countywide Final Determination of Regional Housing Need for Trinity County. Also, transmitted is the Regional Housing Need Plan the Department is required to provide, pursuant to Government Code Section 65584.06, to counties not represented by council of governments (COGs).

In finalizing and distributing the regional housing need allocation (RHNA), by income category, to every local government in the county, the Department shared its proposed methodology, assumptions and draft figures for local government representatives to review and comment. While the Department did not receive comments requiring a change in finalizing the RHNA distribution, it received correspondence from local government representatives indicating acceptance of the proposed determination and distribution as shown in Attachment 2.

As you know, Senate Bill 375 (Chapter 728, Statutes of 2008) further strengthened the existing coordination of housing and transportation planning, and amended the RHNA schedule and methodology and, among other things, strengthened rezoning requirements.

Since only partial demographic data was available from Census 2010 and the Department of Finance (DOF), the Department's RHNA determination also utilized American Community Survey (ACS) data. In assessing county's regional housing need, the Department considered the critical role housing plays in developing sustainable communities and supporting employment growth. The Department determined the county's regional housing need to be 10 units for the 5.5-year projection period from January 1, 2014 through June 30, 2019. This RHNA reflects the Department's consideration of recent household formation trends to generate housing demand at a changing pace.

In determining the regional housing need, consideration was also given to the extraordinary uncertainty regarding national, State, local economies and housing markets. As a result, for this RHNA cycle only, the Department made an adjustment to account for abnormal vacancies and unique market conditions due to prolonged recessionary conditions, high unemployment, and unprecedented foreclosures.

In assessing the county's regional housing needs, the Department and local governments' representatives completed the consultation process specified in statute between May and June 2012. Consultation with local governments involved Mr. Frank Lynch, Senior Planner, County of Trinity. The Department also consulted with Ms. Mary Heim, demographic expert, and retired Chief of DOF's Demographic Research Unit.

In finalizing the RHNA, the Department applied methodology and assumptions regarding the following factors (Government Code Section 65584.01(c)(1)):

- anticipated household growth associated with projected population increases;
- household size data and trends in household size;
- rate of household formation, or headship rates, based on age, gender, ethnicity, or other established demographic measures;
- vacancy rates in existing housing stock, and for healthy housing market functioning and regional mobility, as well as housing replacement needs;
- other characteristics of the composition of the projected population; and
- the relationship between jobs and housing, including any imbalance between jobs and housing.

Assumptions also included the rate with which existing vacant "for sale" and "for rent" housing units may be absorbed for occupancy by the beginning of the projection period in 2014.

The Attachments to this letter describe details of the Department's methodology and RHNA income category distribution in allocating 10 housing units to the county's local government. HCD must provide each locality a RHNA share of very-low, low-, and moderate-income units that at least equals the total for each of these income categories shown in Attachment 1 and also distribute housing need for above-moderate income households. The RHNA represents the *minimum* amount of residential development capacity a jurisdiction must plan to accommodate through zoning and appropriate development strategies. RHNA is not to be used within local general plans as a maximum amount or cap of residential development to plan for or approve.

The housing element due date schedule is updated periodically on the Department's website at: http://www.hcd.ca.gov/hpd/hrc/plan/he/he_due_dates_updated042412.pdf.

In updating their housing elements, local governments may only take RHNA credit for units permitted since the January 1, 2014 start date of the RHNA projection period. Localities are also required to describe how units were credited to different income categories based on actual or projected sale price or rent level data.

As specified in Section 65584.06(c), a city or county may, within 90 days from the date of this letter, propose to revise the distribution of its share of regional housing need. Such a proposal must comply with criteria set forth in the draft distribution and be based on comparable data available for all affected jurisdictions, accepted planning methodology, and adequate documentation. Subsequent to the Department's decision regarding the proposal to revise the distribution, a city or a county is allowed 30 days to request a public hearing to review the Department's distribution.

We look forward to a continued partnership with Trinity County in planning efforts to accommodate the region's housing need. If you have any questions or need additional assistance, please contact me or Anda Draghici, Senior Housing Policy Specialist, at (916) 445-4728.

Sincerely,



Glen A. Campora
Acting Deputy Director

Enclosures

ATTACHMENT 1

HCD REGIONAL HOUSING NEED DETERMINATION: Trinity County Projection Period: January 1, 2014 through June 30, 2019

Income Category	Percent	Regional Housing Need (rounded) ⁽¹⁾
Very-Low	20.4%	2
Low	19.1%	2
Moderate	19.6%	2
Above-Moderate	40.9%	4
Total	100.0% ⁽²⁾	10 ⁽³⁾

(1) Per Government Code (GC) 65584.06 (a), for cities and counties without a COG, HCD shall determine and distribute the existing and projected housing need, in consultation with Department of Finance (DOF) and local governments in accordance with GC 65584. The Legislature recognizes that different assumptions and variances in methodologies can be used that can result in different population projections. Projection of housing need developed by DOF and HCD for RHNA purposes does not consider local government constraints.

For this RHNA cycle only (due to unique conditions not expected to recur to impact future RHNA cycles), the housing need was adjusted downward to account for an estimated 80 percent absorption level of unprecedented high vacancies in existing stock due to extraordinary conditions including high foreclosures and economic uncertainties.

(2) The income category percentages reflect the minimum percentage applied against the total RHNA by HCD in determining housing need for very-low, low, and moderate income households. Each category is defined by Health and Safety Code (Section 50093, et seq.). Percentages are derived from the 2006-2010 American Community Survey's number of households by income, over 12 month periods. Housing unit need under each income category is derived from multiplying the portion of households per income category against the total RHNA determination.

(3) The 10 allocation (see Attachment 2) reflects the county's projected minimum housing need (rounded), using household formation rates from 2010 Census and an adjustment (-5) for existing excess vacant units in estimating 10% of vacant units will not be absorbed before 2014. This column represents the minimum housing need that the county's RHNA Plan must address in total and also for very-low, low, and moderate income categories.

ATTACHMENT 2
HCD REGIONAL HOUSING NEED DETERMINATION: Trinity County

Draft HCD Determined Population, Households, & New Housing Need: January 1, 2014-June 30, 2019 (5.5 years)				
1	Population: June 30, 2019 (DOF Interim)			14,277
2	<i>less: Group Quarters Population Census 2010 estimate</i>			390
3	Household (HH) Population June 30, 2019			13,887
	Household Formation Groups	2019 HH Population	HH Formation or Headship Rate (2010 Census)	2019 Households
	All Age Groups (DOF)			6,079
	Under 15	2,633		
	15 - 24 years	1,223	12.63%	154
	25 - 34 years	1,307	45.97%	601
	35 - 44 years	1,203	52.63%	633
	45 - 54 years	1,726	55.03%	950
	55 - 64 years	2,369	60.67%	1,437
	65 -74 years	1,979	65.31%	1,292
	75 - 84 years	1,085	70.02%	760
	84+	362	69.45%	252
4	Projected Households-June 30, 2019			6,079
5	<i>less: Households at Beginning of Projection Period (January, 2014)</i>			6,065
6	Household Growth: 5.5 Year Projection Period			14
7	Vacancy Allowance	Owner	Renter	Total
	Tenure Percentage per 2010 Census	70.4%	29.6%	
	HH Growth by Tenure	10	4	14
	Healthy Vacancy Rate	2.00%	5.00%	
	Vacancy Allowance	1	1	2
8	Replacement Allowance (minimum)	0.50%		16
				1
				17
9	<i>less: Adjustment for Absorption of Existing Excess Vacant Units</i>			
	Estimate 80% Absorbed, 20% Not Absorbed by 2014	Effective Vacant Units	Healthy Market Units	Differential
	Derived (2010 Census, HH Growth, & Vacancy Rate)	(237)	184	-53
	Total 2012 Housing Stock	8,698		
	Existing Vacant Unit (Others) Adjustment	4.11%	4.45%	
	Total Adjusted Existing Vacant Units (Others)	(358)	390	32
	Estimated Vacant Units Not Absorbed by 2014	10%		-53
				-5
	REGIONAL HOUSING NEED DETERMINATION			10

- Population:** Pursuant to Government Code Section 65584.01(b), 65584.06 and in consultation with local governments , June 30, 2019 population projection was extrapolated based on Department of Finance (DOF) Interim Projections published in May 2012 for July 2020 and July 2015, and DOF's E5 estimate for January 2012.
- Group Quarter Population:** Figure is an estimate of persons residing either in a group home, institution, military, or dormitory using 2010 Census data for group quarters. As this population doesn't constitute a "household" population generating demand for a housing unit, the group quarter population is excluded from the calculation of the household population, and is not included in the housing need.
- Household (HH) Population:** The portion of population projected to reside in housing units after subtracting the group quarter population from total projected population.
- Projected 2019 Households (HHs):** The June 2019 number of households is derived by applying (to 2019 HH population) household formation rates calculated based on 2010 Census, as provided by DOF. HH formation or headship rates reflect the propensity of different population groups (age, racial and ethnic) to form households.

ATTACHMENT 2

HCD REGIONAL HOUSING NEED DETERMINATION: Trinity County

- 5 **Households at Beginning of Projection Period:** The baseline number of households at the beginning of the projection period (January 2014) must be projected, as a direct effect of amendment to Section 65588(e)(6) specifying the new projection period to start on either June 30 or December 31 whichever date most closely precedes the end of the current housing element period (June 30, 2014 for the county). As such, the 2014 household number was calculated based on 2014 population as an interpolation between DOF's E5 2012 estimate of households and the DOF's 2015 projected population.
- 6 **Household (HH) Growth:** This figure reflects projected HH growth and need for new units.
- 7 **Vacancy Allowance:** An allowance (unit increase) is made to facilitate availability and mobility among owner and renter units. Owner/Renter % is based on Census 2010 data. A smaller rate is applied to owner units due to less frequent mobility than for renter households. Information from a variety of authoritative sources supports an acceptable range of 1 to 4% for owner units and 4 to 8% for renter units depending on market conditions.
- 8 **Replacement Allowance:** Rate (0.5%) reflects the average housing losses that localities annually reported to DOF each January for years 2002-2011 multiplied by the number of years in the projection period (5.5), or 0.5%, whichever is higher.
- 9 **Adjustment for Absorption of Existing Excess Vacant Units:** For this RHNA cycle only (due to extraordinary uncertainty regarding conditions impacting the economy and housing market not expected to similarly impact future RHNA cycles), a new one-time adjustment was made to account for unprecedented high vacancies in existing stock due to unusual conditions including high foreclosures and economic uncertainties. An absorption rate of 90% of existing excess vacant units is assumed to occur in shrinking current excess vacant units before the start of the 2014 RHNA projection period. This results in applying a 10% adjustment to account for units not absorbed, reflected in a downward adjustment of (- 5). In general, existing vacant units in housing stock consists of two components: (1) housing units for sale and rent in existing housing stock that are above the housing units required to maintain the healthy market condition, calculated as the number of units in housing stock (for sale + for rent + sold, not occupied + rented, not occupied + occupied units), (2) housing units in the "vacant units others" category of existing housing stock above the simple average of 4.45% calculated based on Census data from 2000 and 2010. The Department used 2010 Census Demographic profile data (DP-1) and desirable "normal" vacancy rates by tenure, in conjunction with the region's household growth and proposed household formation rates. The vacancy adjustment is limited to not exceed the differential between the 2010 Census vacant units and the healthy market vacant units rate associated with the region's annual household growth. As the adjustment was below the differential, the adjustment was applied in calculating the RHNA determination. *For Trinity County, there was no adjustment for "other vacant" units, as the normal rate over the past two decades was higher than the 2010 Census rate, indicating that the region did not have an excess of "other vacant" units.*

RHNA Projection Period January 1, 2014 to June 30, 2019: Pursuant to SB 375, the start of the RHNA *projection* period (in effect January 1, 2014) was determined pursuant to GC 65588(e)(6), which requires the new projection period to start on June 30 or December 31 that most closely precedes the end of the current housing element period, which for the county is June 30, 2014. The end of the projection period was determined pursuant to GC 65588(e)(5) to be the end of the housing element planning period.

Housing Element Planning Period June 30, 2014 to June 30, 2019: The housing element *planning* period was determined pursuant to GC 65588(e)(3)(B) and 65588 (f)(1) as a 5-year period between the due date for one housing element and the due date for the next housing element.