

CITY OF WINTERS PLANNING COMMISSION AGENDA

Tuesday, October 25, 2011 @ 6:30 PM

City of Winters Council Chambers
318 First Street
Winters, CA 95694-1923
Community Development Department
Contact Phone Number (530) 795-4910 #114
Email: jenna.moser@cityofwinters.org

Chairman: Wade Cowan
Vice Chairman: Pierre Neu
Commissioners: Bill Biasi, Bruce Guelden, Phillip Meisch, Luis Reyes, Joe Tramontana
Administrative Assistant: Jenna Moser
Community Development Director: Nelia Dyer

I CALL TO ORDER 6:30 PM

II ROLL CALL & PLEDGE OF ALLEGIANCE

III CITIZEN INPUT: Individuals or groups may address the Planning Commission on items which are not on the Agenda and which are within the jurisdiction of the Planning Commission. **NOTICE TO SPEAKERS:** Speaker cards are located on the first table by the main entrance; please complete a speaker's card and give it to the Planning Secretary at the beginning of the meeting. The Commission may impose time limits.

IV CONSENT ITEM
Approval of Meeting Minutes from the September 27, 2011 regular meeting of the Planning Commission.

V. STAFF/COMMISSION REPORTS

VI DISCUSSION ITEMS:

A. *Information Item – Update on the Sacramento Area Council of Government (SACOG) 2013-21 Regional Housing Needs Allocation (RHNA) Process*

Staff will provide a brief update of the 2013-21 RHNA Process.

VII COMMISSION/STAFF COMMENTS

VIII ADJOURNMENT

POSTING OF AGENDA: PURSUANT TO GOVERNMENT CODE § 54954.2, THE COMMUNITY DEVELOPMENT ADMINISTRATIVE ASSISTANT OF THE COMMUNITY DEVELOPMENT DEPARTMENT POSTED THE AGENDA FOR THIS MEETING ON OCTOBER 20, 2011.


JENNA MOSER - ADMINISTRATIVE ASSISTANT

APPEALS: ANY PERSON DISSATISFIED WITH THE DECISION OF THE PLANNING COMMISSION MAY APPEAL THIS DECISION BY FILING A WRITTEN NOTICE OF APPEAL WITH THE CITY CLERK, NO LATER THAN TEN (10) CALENDAR DAYS AFTER THE DAY ON WHICH THE DECISION IS MADE.

PURSUANT TO SECTION 65009 (B) (2), OF THE STATE GOVERNMENT CODE "IF YOU CHALLENGE ANY OF THE ABOVE PROJECTS IN COURT, YOU MAY BE LIMITED TO RAISING ONLY THOSE ISSUES YOU OR SOMEONE ELSE RAISED AT THE PUBLIC HEARING(S) DESCRIBED IN THIS NOTICE, OR IN WRITTEN CORRESPONDENCE DELIVERED TO THE CITY PLANNING COMMISSION AT, OR PRIOR TO, THIS PUBLIC HEARING".

MINUTES: THE CITY DOES NOT TRANSCRIBE ITS PROCEEDINGS. ANYONE WHO DESIRES A VERBATIM RECORD OF THIS MEETING SHOULD ARRANGE FOR ATTENDANCE BY A COURT REPORTER OR FOR OTHER ACCEPTABLE MEANS OF RECORDATION. SUCH ARRANGEMENTS WILL BE AT THE SOLE EXPENSE OF THE INDIVIDUAL REQUESTING THE RECORDATION.

PUBLIC REVIEW OF AGENDA, AGENDA REPORTS, AND MATERIALS: PRIOR TO THE PLANNING COMMISSION MEETINGS, COPIES OF THE AGENDA, AGENDA REPORTS, AND OTHER MATERIAL ARE AVAILABLE DURING NORMAL WORKING HOURS FOR PUBLIC REVIEW AT THE COMMUNITY DEVELOPMENT DEPARTMENT. IN ADDITION, A LIMITED SUPPLY OF COPIES OF THE AGENDA WILL BE AVAILABLE FOR THE PUBLIC AT THE MEETING. COPIES OF AGENDA, REPORTS AND OTHER MATERIAL WILL BE PROVIDED UPON REQUEST SUBMITTED TO THE COMMUNITY DEVELOPMENT DEPARTMENT. A COPY FEE OF 25 CENTS PER PAGE WILL BE CHARGED.

ANY MEMBER OF THE PUBLIC MAY SUBMIT A WRITTEN REQUEST FOR A COPY OF PLANNING COMMISSION AGENDAS TO BE MAILED TO THEM. REQUESTS MUST BE ACCOMPANIED BY A CHECK IN THE AMOUNT OF \$25.00 FOR A SINGLE PACKET AND \$250.00 FOR A YEARLY SUBSCRIPTION.

OPPORTUNITY TO SPEAK, AGENDA ITEMS: THE PLANNING COMMISSION WILL PROVIDE AN OPPORTUNITY FOR MEMBERS OF THE PUBLIC TO ADDRESS THE COMMISSION ON ITEMS OF BUSINESS ON THE AGENDA; HOWEVER, TIME LIMITS MAY BE IMPOSED AS PROVIDED FOR UNDER THE ADOPTED RULES OF CONDUCT OF PLANNING COMMISSION MEETINGS.

REVIEW OF TAPE RECORDING OF MEETING: PLANNING COMMISSION MEETINGS ARE AUDIO TAPE RECORDED. TAPE RECORDINGS ARE AVAILABLE FOR PUBLIC REVIEW AT THE COMMUNITY DEVELOPMENT DEPARTMENT FOR 30 DAYS AFTER THE MEETING.

THE COUNCIL CHAMBER IS WHEELCHAIR ACCESSIBLE

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* *New information in italics*

PROJECT	DESCRIPTION & PROCESS	LAST ACTION	NEXT ACTION
(1) Winters Highlands, Meyer Crest, Bert Meyer (530) 242-2010	Application filed to develop 413 single-family and 30 multi-family residential units in northwestern part of city.	City Council approved the Second Amendment to the Development Agreement on January 6, 2009.	Applicant submittal of Final Map and Improvement Plans.
(2) Winters Village, Bob Thompson (West project) (707) 372-9355	Proposal to develop 10 attached single-family residences on the southwest corner of East Main and East Baker Streets.	Applicant in October 2007 decided to defer construction of the project.	Project not active.
(3) Callahan Estates, Winters Investors LLC, John Peterson (925) 682-4830	Proposal to develop 120 single-family residential lots in northwest part of city.	City Council approved the First Amendment to the Development Agreement on January 20, 2009	Applicant submittal of Final Map and Improvement Plans.
(4) Creekside Estates, Jim Wirth (916) 617-4248	Proposal to develop 40 single-family residential lots at southwest part of city.	City Council approved Tentative Subdivision Map on April 19, 2005.	Project not active.
(5) Hudson-Ogando, Winters Investors LLC, John Peterson (925) 682-4830	Proposal to develop 72 single-family residential lots in northwest part of city.	City Council approved the First Amendment to the Development Agreement on January 20, 2009	Applicant submittal of Final Map and Improvement Plans.
(6) Cottages at Carter Ranch Phase 2, Sacramento Pacific Development, Mark Wiese (916) 853-9800	Proposal to develop 6 single-family residential affordable lots (moderate-income households) north of Rancho Arroyo Detention Facility.	-Planning Commission approved Tentative Subdivision Map on November 23, 2004. -City Council approved the applicant's request for infrastructure funding on November 3, 2009.	Applicant submittal of Final Map and Improvement Plans.
(7) Casitas at Winters, Napa Canyon LLC, Mark Power (707) 253-1339	Proposal for 5-unit tentative subdivision map at a site on West Grant Avenue east of Tomat's restaurant. Tentative Subdivision Map, Planned Development Overlay, and PD Permit.	City Council at its January 15, 2008 meeting took final action by approving the Rezone Ordinance.	Applicant submittal of Final Map and Improvement Plans.
(8) Mary Rose Gardens, DAS Homes, Inc., Dave Snow (530) 666-0506	Proposal to develop 26 single-family homes and one duplex unit on the north side of West Grant Avenue west of Cemetery Lane. Tentative Subdivision Map, Planned Development Overlay, PD Permit, Rezone, Inclusionary Housing Agreement, and Development Agreement.	Applicant declined option to purchase project property.	Project not active.
(9) Anderson Place, Eva Brzeski (415) 887-9300	Proposal to develop up to 28 mostly attached single-family residences and 9 commercial spaces at 723 Railroad Avenue. Interim use of C2 portion of the site for boat and RV storage, sales and repair.	First Amendment to Development Agreement adopted by City Council on June 3, 2008 CUP for boat & RV storage, sale & repair approved by Planning Commission on May 27, 2008.	Applicant to demo building and establish interim boat & RV storage, sales and repair. Applicant submittal of Final Map and Improvement Plans.
(10) Pearse Parcel Map, Thomas Pearse (530) 795-5901	Proposal for 4-unit parcel map at the south end of Third Street.	Planning Commission on October 9, 2007 approved project.	Applicant submittal of Final Map and Improvement Plans.

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<p>(11) Winters Commercial, Granite Bay Holdings, LLC, Tyler Wade (916) 580-1855</p>	<p>Proposal to develop 4.52 acres on south side of Grant Avenue directly west of Round Table Pizza complex for 49,500 square feet of commercial and office uses. Site Plan. Application submitted on August 17, 2007 and deemed complete on October 22, 2007.</p>	<p>-Per COW Municipal Code, Chapters 17.20 (Use Permits) and 17.36 (Design Review), Community Development Director approved an extension for both permits on December 5, 2008. -Community Development Agency purchased the subject site in Summer 2009. CDA issued RFP for development of site in October 2009. City issuance of incomplete application letter on February 1, 2008.</p>	<p>Community Development Agency (CDA) approved an extension of an Exclusive Negotiating Rights Agreement By and Between the CDA and Yackzan Group, Inc. for the Development of the Grant Avenue Commercial Property. Project Inactive/Closed out</p>
<p>(12) Winters Estates Annexation, Winters Estates LLC, Helmut Sommer 707-678-9000</p>	<p>Proposal to annex 80 acres (APNs 030-210-05 & 08) adjacent to County Road 88 and within the City's General Plan Area.</p>	<p>City issuance of incomplete application letter on February 1, 2008.</p>	<p>Project Inactive/Closed out</p>
<p>(13) Monticello Mixed-Use Project</p>	<p>Application for Site Plan Review and Design Review, and CUP for the construction of a mixed-use project (commercial/retail, office and residential) on 0.42 acre on the east side of Railroad Ave. between Abbey St. and Main St, in downtown Winters CBD.</p>	<p>CDA at its September 2, 2008 meeting approved the DDA for the project</p>	<p>Not active/DDA expired</p>
<p>(14) Orchard Village, CVCAH/Pacific West Communities, Shellan Miller (208) 461-0022 Ext. 3033</p>	<p>Proposal to construct 74 multifamily (workforce housing) units on 10.6 acres between Railroad Ave, and Dutton Street extension, north of East Grant Ave. To include 1-, 2-, 3-, and 4-bedroom units + a community center.</p>	<p>Planning Commission approved Site Plan (Design Review) and adopted MND and MMP on January 27, 2009. Appeal of PC's decision was filed on February 4, 2009 by Catherine Jimenez. City Council denied the appeal at the March 3, 2009 City Council Meeting. Applicant submitted improvement and building plans in October 2009.</p>	<p>Complete</p>
<p>(15) St. Anthony's Catholic Church Parish & Rectory, Roman Catholic Church of Sacramento/ McCandless & Associates (530) 662-9146</p>	<p>Proposal to construct a new Catholic Church and associated site work at the corner of Main & Grant Streets.</p>	<p>-On April 21, 2009, the City Council approved the ordinance to rezone the property, adding a PD overlay. -Applicant submitted improvement and building plans in December 2009.</p>	<p>Issuance of Building Permit(s)</p>
<p>(16) 115 E. Grant Avenue Fueling Canopy, David Lorenzo (530) 795-3214</p>	<p>Proposal to construct a fueling canopy and install 4 new fueling dispensers at 115 E. Grant Avenue.</p>	<p>Planning Commission approved the Design Review (Site Plan) on February 24, 2009.</p>	<p>Complete</p>
<p>(17) Turkovich Family Wines, 304 Railroad Avenue, (530) 795-2767</p>	<p>Application for a Conditional Use Permit to operate a wine tasting room at 304 Railroad Avenue</p>	<p>Application was filed on January 29, 2009. Planning Commission approved the Conditional Use Permit for the project on March 24, 2009.</p>	<p>Complete</p>

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(18) The Tree House Children's Center, 418 Haven Street, (530) 304-8248	Application for a Conditional Use Permit to operate a children's center at 418 Haven Street	Application was filed on March 19, 2009. Planning Commission approved the Conditional Use Permit for the project on April 28, 2009.	Complete
(19) Winters Community Church, 113 Main Street, (530) 795-5530	Application for a Conditional Use Permit to operate a religious institution at 113 Main Street	Application was filed on April 6, 2009. Planning Commission approved the Conditional Use Permit on May 26, 2009.	Complete
(20) Turkovich Family Winery, 22-A Main Street, (530) 795-2767	Application for a Conditional Use Permit to operate a winery at 22-A Main Street	Application was filed on June 6, 2009. Planning Commission approved the Conditional Use Permit on July 14, 2009.	Complete
(21) Winters Healthcare Foundation Administrative Offices, 310 Main Street, (530) 795-5200	Application for a Conditional Use Permit to conduct an office use in a residential zone	Application was filed on July 8, 2009. Planning Commission approved the Conditional Use Permit on August 25, 2009	Complete
(22) AT&T Cell Tower Co-location at Rd 88 & Rd 32A, (916)601-1123	Application for a Conditional Use Permit to co-locate additional antennas on an existing tower at Rd 88 & 32A. The existing cell tower is located on City property	Application was filed on July 17, 2009. Planning Commission approved the Conditional Use Permit on August 25, 2009.	Complete
(23) 111-115 Main Street Façade Improvement Project (530) 795-3506	Design Review application for the façade improvement of 111-115 Main Street.	Application was filed on October 10, 2009. Planning Commission approved the Design review Application on October 27, 2009.	
(24) Main Street Cellars Wine Café, 9 East Main Street, Suite J (209) 304-7953	Application for a Conditional Use Permit to operate a wine bar at 9 East Main Street, Suite J	-Application was filed on October 30, 2009. Public hearing scheduled for November 24, 2009 -Planning Commission approved Conditional Use Permit on November 24, 2009	Complete
(25) Burger King/Union 76 at East Grant Avenue and County Road 90 (530) 755-4700	Application for a Design Review/Site Plan and Sign Permit to construct a co-brand fuel station, convenience store and fast food restaurant at East Grant Avenue and CR 90. A sign permit is required for the proposed freeway sign.	-Application was filed on December 7, 2009. The application was deemed "incomplete" by staff on January 4, 2010. - Public Hearing and Informational Item scheduled for January 26, 2010. -A public hearing was scheduled for a special Planning Commission meeting on August 10, 2010. The Planning Commission approved the application. On August 20, 2010, the City received a notice of appeal of the	Improvement and building plans submitted for review.

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<p>(26) Tentative Parcel Map for Jordan Family (530)662-1755</p>	<p>Application for Tentative Parcel Map for property located southwest of I-505/SR 128 to realign the proposed Gateway Drive street alignment and reconfigure the lots to match the new alignment.</p>	<p>Planning Commission's Action. -Appeal Hearing was scheduled for a special City Council meeting on Wednesday, September 29, 2010. - City Council denied the appeal and upheld the Planning Commission's decision at the special City Council meeting held on September 29, 2010. -Application was filed on December 16, 2009. The application was deemed "incomplete" by staff on January 12, 2010. -The application was deemed complete on March 10, 2010. A public hearing was scheduled for the May 25, 2010 Planning Commission Meeting. The Planning Commission recommended approval of the Tentative Parcel Map to the City Council. - The City Council held a public hearing and approved the tentative parcel map on June 5, 2010.</p>	
<p>(27) Kristensen Drywall and Pearce Heating & Air Conditioning, 27990 CR 90, (530) 795-8800</p>	<p>Application for a Conditional Use Permit (CUP) to operate light general manufacturing uses in a Light Industrial (M-1) zone at 27990 CR 90.</p>	<p>Application was filed on February 18, 2010. A public hearing for the application was scheduled for the March 23, 2010 Planning Commission Meeting. The Commission approved the CUP at the March 23, 2010 meeting.</p>	<p>Active Business</p>
<p>(28) Briggs & Co., 820 Railroad Avenue, (530) 795-9505</p>	<p>Application for a Conditional Use Permit (CUP) for extension of a non-conforming use at 820 Railroad Avenue.</p>	<p>Application was filed on March 1, 2010. A public hearing for the application was scheduled for the March 23, 2010 Planning Commission meeting. The public hearing was continued off calendar. Another public hearing was scheduled for the August 24, 2010 Planning Commission meeting. The public hearing was continued off calendar by staff.</p>	
<p>(29) Preserve, Inc., 200 and</p>	<p>Application for a Conditional Use Permit (CUP) to amend an</p>	<p>Application was filed on March 4,</p>	<p>Complete/Active Business</p>

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<p>202 Railroad Avenue, (530) 795-3816</p>	<p>existing conditional use permit for on-site sale and consumption of alcoholic beverages at 200 and 202 Railroad Avenue to include the space at 3 Russell Street</p>	<p>2010. A public hearing for the application was scheduled for the March 23, 2010 Planning Commission (PC) Meeting. The public hearing was continued to a special PC meeting on April 5, 2010. PC approved the CUP at the meeting on April 5, 2010.</p>	
<p>(30) Main Street Plaza, 111 Main Street, (530) 795-3214</p>	<p>Application for a Sign Permit and Variance to modify a nonconforming sign location at 111 Main Street</p>	<p>Application was filed on March 4, 2010. A public hearing for the application was scheduled for the March 23, 2010 Planning Commission (PC) Meeting. PC approved the variance at the meeting on March 23, 2010.</p>	<p>Complete</p>
<p>(31) New Single Family Home, 415 First Street, (916) 600-5401</p>	<p>Application for a Site Plan (Design Review) application for the construction of a new single-family, single-story house at 415 First Street</p>	<p>Application was filed on April 2, 2010. A public hearing for the application was scheduled for the April 27, 2010 Planning Commission (PC) Meeting. PC approved the Design Review application at the meeting on April 27, 2010.</p>	<p>Complete</p>
<p>(32) Addition to Existing Single-Family Residence, 455 Russell Street, (530) 867-6444</p>	<p>Application for a Site Plan (Design Review) application for the construction of a 1,500 square-foot addition to an existing single family residence at 455 Russell Street</p>	<p>Application was filed on April 9, 2010. A public hearing for the application was scheduled for the April 27, 2010 Planning Commission (PC) Meeting. PC approved the Design Review application at the meeting on April 27, 2010.</p>	<p>Complete</p>
<p>(33) Parcel Map for 101 East Grant Avenue, (530) 668-5883</p>	<p>Application for the dedication of right-of-way for the Walnut Lane Re-Alignment Project and splitting one lot into two new lots at 101 East Grant Avenue (APN 003-350-06)</p>	<p>Application was filed on June 1, 2010. A public hearing for the application was scheduled for the June 22, 2010 Planning Commission Meeting. It has been continued to a special meeting in July due to the need for additional time to process the preliminary map with Yolo County. A public hearing was scheduled for the August 24, 2010 Planning Commission. Parcel map was approved at the Planning Commission meeting on August 24, 2010.</p>	<p>Complete</p>

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<p>(34) 22 Main Street, (530) 795-2060</p>	<p>Application for a Conditional Use Permit (CUP) to operate a wine tasting room at a proposed boutique/gift shop to be located at 22 Main Street</p>	<p>Application was filed on June 10, 2010. Staff could not process the project until ordinance relevant to the project was amended. A public hearing for the project was held on October 26, 2010. The Planning Commission approved the issuance of the CUP.</p>	<p>Active Business</p>
<p>(35) 113 Main Street, CUP for Anytime Fitness (650) 483-2201</p>	<p>Application for a Conditional Use Permit (CUP) to operate a 24-hour gym at 113 and 115 Main Street</p>	<p>Application was filed on September 14, 2010. A public hearing for the project was held on October 12, 2010. The Planning Commission approved the issuance of the CUP.</p>	<p>Construction completed/Active Business</p>
<p>(36) Winters Self Storage, 807 Railroad Avenue, Site Plan/Design Review, Variances and CUP</p>	<p>Application to expand the existing use at 807 Railroad</p>	<p>Application was filed in November 2011. An information item is scheduled for the April 26, 2011 Planning Commission. The public hearing for the project is tentatively scheduled for the May 24th Planning Commission meeting. The public hearing was continued to the regular meeting of the Planning Commission on June 28, 2011. The Planning Commission approved the variances, CUP, and Site Plan/Design Review.</p>	<p>Applicant submittal of improvement and building plans</p>
<p>(37) Turkovich Family Wines, 304 Railroad Avenue – CUP Mod</p>	<p>Application for a modification of an existing conditional use permit to expand the business into 306 Railroad Avenue, the basement beneath 304 Railroad Avenue, and the sidewalk area in front of 304 and 306 Railroad Avenue.</p>	<p>Application was filed in April 2011. A public hearing was scheduled for the April 26, 2011 Planning Commission Meeting. The Planning Commission approved the CUP modification on April 26, 2011.</p>	<p>Improvement and building plans submitted for review.</p>
<p>(38) John Neil, Access Manufacturing, 1801 Railroad Avenue, Design Review</p>	<p>Application to construct an approx. 1,500 square foot modular office building for temporary use at 1801 Railroad Avenue</p>	<p>Application was filed in April 2011. A public hearing was scheduled for the April 26, 2011 Planning Commission Meeting. The Planning Commission approved the project on April 26, 2011.</p>	<p>Applicant submittal of improvement and building plans</p>
<p>(39) Eric Doud, Northeast corner of East Abbey Street and Railroad Avenue – CUP and Design Review</p>	<p>Application to construct an approx. 1500 square foot modular office building for the American Council for Food Safety & Quality at the northeast corner of Railroad Avenue and East Abbey Street, adjacent to the Mariani Nut Processing Warehouse.</p>	<p>Application was filed in June 2011. A public hearing is scheduled for the July 26, 2011 Planning Commission Meeting. The Planning Commission approved the project on July 26,</p>	<p>Improvement and building plans submitted for review.</p>

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		2011.
Ordinances/Resolutions		
Code Enforcement Ordinance	Preparation of Ordinance to adopt Title 19 (Code Enforcement) to the Winters Municipal Code.	-Presentation to Planning Commission on November 24, 2009. -Presentation to City Council on December 1, 2009. -Adopted by City Council in January 2010.
General Plan Horizon Year Extension	Extend the General Plan Horizon Year Extension from 2010 to 2018.	CC approved the extension on September 1, 2009. Staff prepared and presented the Work Plan resulting from the extension to the PC on October 27, 2009
Affordable Housing Ordinance	Preparation of an Ordinance to add Chapter 17.200 to the Winters Municipal Code (Zoning) pertaining to Affordable Housing Requirements	-Reviewed favorably by Affordable Housing Steering Committee on November 3, 2009. -PC recommended approval to City Council on November 24, 2009. -City Council adopted the Affordable Housing Ordinance on January 5, 2010
Housing Element	Preparation and Adoption of Housing Element Update for the 2008-2013 Planning Period	City Council adopted the Housing Element Update on September 1, 2009. Staff preparing ordinances specified in the 2008-13 Housing Element Update.
Grant Avenue Design Guidelines	Preparation and Adoption of the Grant Avenue Design Guidelines	Public Hearing and Consideration of a Recommendation to the City Council of the Adoption of the Grant Avenue Design Guidelines is scheduled for the July 26, 2011 Planning Commission Meeting The Planning Commission recommended adoption of the Guidelines to the City Council. The City Council adopted the Guidelines on August 16, 2011
Ordinance to Prohibit the Establishment of Businesses or Uses Prohibited by State and/or Federal Law	Preparation and Adoption of an Ordinance to Prohibit the Establishment of Businesses or Uses Prohibited by State and/or Federal Law.	Public Hearing and Consideration of Recommendation to the City Council of the subject Ordinance is scheduled for the July 26, 2011 Planning

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		Commission Meeting. The City Council adopted the Ordinance on September 6, 2011.	
CDA Projects			
Abbey Street Partial Abandonment	Partial abandonment of East Abbey St to allow for Monticello development	PC accepted GP consistency report and recommended to Council 4/22/08. CDA at its September 2, 2008 meeting approved the DDA for the project.	Applicant submittal of improvement and building plans for the Monticello Project
Public Safety Facility	Application for Site Plan Review and Design Review, CUP and Variance for the construction of the City's public safety facility on 2.78 acres of the Ogando-Hudson Subdivision (Grant Ave @West Main Street)	PC hearing on 7/22/08 – PC approved project subject to COAs presented in staff report.	Received Temporary Certificate of Occupancy on September 7, 2011.
City Parking Lot at Abbey and First Street	Design Review Application for the temporary renovation of the City's parking lot at First and Abbey Streets	Planning Commission approved the Site Plan on October 27, 2009	Under Construction

MINUTES OF THE WINTERS PLANNING COMMISSION MEETING HELD SEPTEMBER 27, 2011

***DISCLAIMER:** These minutes represent the interpretation of statements made and questions raised by participants in the meeting. They are not presented as verbatim transcriptions of the statements and questions, but as summaries of the point of the statement or question as understood by the note taker.*

Chairman Cowan called the meeting to order at 6:30PM.

PRESENT: Commissioners Biasi, Guelden, Neu, Reyes, Tramontana, and Chairman Cowan

ABSENT: Commissioner Meisch

STAFF: Community Development Director Nelia Dyer, Housing Programs Manager Dan Maguire, and Administrative Assistant Jenna Moser

Dan Maguire led the Pledge of Allegiance.

CITIZEN INPUT: None

COMMUNICATIONS: None

STAFF REPORTS: None

COMMISSION REPORTS: None

CONSENT ITEM: Approve minutes of the July 26, 2011 Meeting of the Planning Commission.

Motion by Commissioner Guelden, Second by Vice Chairman Neu to approve minutes of the July 26, 2011 Meeting of the Planning Commission

AYES: Commissioners Biasi, Guelden, Neu, Reyes, Tramontana, and Chairman Cowan

NOES: None

ABSTAIN: None

ABSENT: Commissioner Meisch

DISCUSSION ITEM:

A. Informational Item – Update on the I-505/SR 128 Land Use Modifications

Community Development Director Dyer provided an overview of the staff report and process.

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Commissioner Tramontana asked Ms. Dyer to define Planned Commercial and Neighborhood Commercial and asked if houses could be built there. Ms. Dyer responded that Planned Commercial (PC) requires a Master Plan, and Neighborhood Commercial (NC) does not, and other than that, the two land use designations are nearly identical in what uses are permitted. Ms. Dyer added that multi-family housing is allowed in the Neighborhood Commercial zone upon Planning Commission approval of a Conditional Use Permit.

Chairman Cowan stated that when the decisions were made to apply these land use classifications (PC and PCB) back in the day, it was done intentionally to thwart development of those areas (requiring a Master Plan). By amending the zoning and land use designations, this land is more developable.

Commissioner Reyes asked about the potential 3-story hotel project north of Grant Avenue. Ms. Dyer responded that the City has not received an application, and that she is unaware of any particular hotel chains being discussed. Ms. Dyer added that Planning Commission approval of a variance would be needed for a 3-story hotel in that zone.

Chairman Cowan stated that the Economic Development Advisory Committee discussed amending the height requirement for the zoning designations and a recommendation was given that staff move forward with this amendment. He further questioned why this has not been considered. Ms. Dyer responded that staff has taken a look at it. She stated that changes to the height requirements may trigger other changes that may impact the current environmental clearance for the City's General Plan. Staff does not want to trigger changes that would require an EIR for the effort to amend the General Plan and zoning.

Chairman Cowan wants to know why we should wait for an application for a hotel project before we adjust zoning. Ms. Dyer responded that staff does not have to wait for an application for a hotel project. Staff could move forward with the recommendations for amending the General Plan document and map as well as the Zoning map without processing the hotel at the same time.

Chairman Cowan stated that we need to get rid of PC and PCB General Plan Land Use Designations as soon as possible to encourage development.

Commissioner Biasi asked for the types of uses are allowed in Highway Serving Commercial (HSC). Ms. Dyer listed several uses including hotels, gas stations, cell phone towers, food, and parks with a conditional use permit.

MINUTES OF THE WINTERS PLANNING COMMISSION MEETING HELD SEPTEMBER 27, 2011

B. Informational Item – Update on the Housing Element Implementation Plan for the 2008-2013 Housing Element

Community Development Director Dyer provided an overview of the staff report and process.

Commissioner Guelden asked for a definition of single-room occupancy. Ms Dyer responded that it is a residential unit that one can rent, approximately 150-300 square feet in size, with communal kitchen facilities, and either communal or individual bathroom facilities.

Commissioner Biasi asked for clarification on the need for a Conditional Use Permit for manufactured housing in the R-4 zone. Ms Dyer stated that any single family dwelling, whether it is a manufactured or stick-built, requires a Planning Commission approval of a Conditional Use Permit.

C. Informational Item – Update on the Sacramento Council of Governments (SACOG) 2013-21 Regional Housing Needs Allocation (RHNA) Process

Community Development Director Dyer provided an overview of the Staff Report and process.

Commissioner Guelden stated that Winters has far surpassed our affordable housing requirements. Commissioner Guelden also asked if Winters is the smallest City in SACOG. Ms. Dyer responded that we are about on par with Isleton as far as size.

Commissioner Guelden asked about the 8 year projection numbers. Ms. Dyer responded that the number provides a target for the City to identify land available for new construction. So, at the end of the planning period, the City does not have to produce the number of units allocated to the City. Ms. Dyer added that this number cannot include rehabilitated units.

Commissioner Neu asked if our numbers were covered by all of the entitled units in the western part of the City. Ms Dyer responded yes. Commissioner Neu asked if we were to do nothing now, would we be covered. Housing Programs Manager Maguire responded generally yes with some subtext.

Chairman Cowan added that it is unfortunate that we cannot “bank” the units that have been constructed. He added that constructing affordable housing costs the City money, and the State has taken the money from us that we use to build it. Mr. Maguire stated that the constructed units that are over and above SACOG’s requirements do not go entirely

**MINUTES OF THE WINTERS PLANNING COMMISSION MEETING HELD
SEPTEMBER 27, 2011**

unrecognized, and asked if the problem was really with the affordable housing being built, or with the market rate housing not being built. Chairman Cowan said point taken.

COMMISSIONER/STAFF COMMENTS:

Commissioner Neu noted that at 8AM on September 28, 2011, a group is forming to do fish rescue at the Putah Creek Rehab Project. All are encouraged to attend to relocate fish from the creek while work is being performed.

The meeting was adjourned by Chairman Cowan at 7:50PM.

ATTEST:

Jenna Moser, Administrative Assistant

Wade Cowan, Chairman



PLANNING COMMISSION
STAFF REPORT

TO: Honorable Chairman and Planning Commissioners
 DATE: October 25, 2011
 FROM: Nelia C. Dyer, Community Development Director *ncd*
 SUBJECT: Information Item - Update on the Sacramento Area Council of Governments (SACOG) 2013-21 Regional Housing Needs Allocation (RHNA) Process

RECOMMENDATION: No official recommendation. The purpose of this information item is to provide an opportunity to the Planning Commission to comment on the City's draft letter to SACOG regarding the 2013-21 Regional Housing Needs Allocation (RHNA) Process.

SUMMARY: At the September 27, 2011 Planning Commission meeting, staff provided an overview of the RHNA process as well as the proposed methodologies for distributing the overall housing need number for SACOG region. As mentioned in the presentation, all cities and counties in California receive two types of allocations through the RHNA as required by state law: 1) Overall Allocation - Total housing number for growth during the planning period from January 1, 2013 to October 31, 2021; and 2) Income Category Distribution - the Overall Allocation is further allocated into four household income categories: very low income, low income, moderate income, and above moderate income.

In summary, Winters has been (unofficially) allocated a total of 320 housing units for which to plan. The income category distribution or, more specifically, the very low and low income allocations differ by methodology. Table A shows the very low and low income allocations by methodology:

Table A

Methodology	Very Low + Low Income Allocations
A	134
B	130
C	108
D	132
F	101

Source: SACOG 2013-2021 RHNA 60-Day Public Comment Draft Proposed Methodologies

Please note that these figures are subject to change until SACOG receives the official letter of

determination from the Housing and Community Development Department (HCD) regarding the Regional Housing Needs Determination for SACOG’s six-county region.

Following the overview of the information at the Planning Commission meeting, staff stated that a letter to SACOG will be drafted identifying the City’s preferred methodology, and staff will provide the draft letter to the Planning Commission for review and comment prior to presenting it to the City Council for their review and approval. Staff has drafted the letter and is recommending Methodology F. The draft letter is included with this report as Attachment A.

Since the last Planning Commission meeting, staff has researched the residential capacity of the Winters’ General Plan Area. Table B shows the residential capacity of the Winters’ General Plan Area.

Table B

Residential Designation	Allowable Units/Gross Acre	Allowable Gross Acres at Buildout	Allowable Units Per Designation (Dwelling Units)
Rural	0.5-1.0	59	59
Low	1.1-4.0	374	1,496
Medium	4.1-6.0	392	1,884
Medium-High	6.1-10.0	86	860
High	10.1-20.0	51	1,020
Total		962	5,319

Source: 1992 City of Winters General Plan

According to the 2010 U.S. Census, there are 2,299 housing units in Winters. Thus, there are approximately 3,000 housing units that have yet to be constructed. Moreover, to fulfill the stipulated settlement resulting from Michel v. Winters regarding the production of affordable housing in the city, at least 15 percent of all new housing units (or approximately 450 units of the 3000) must be affordable. Based on these numbers, staff has determined that Winters has enough capacity to accommodate for the total housing units as well as the very low and low income allocation for the impending planning period.

ATTACHMENTS:

- A. Letter to SACOG regarding the 2013-2021 Regional Housing Needs Allocation
- B. 2013-21 RHNA 60-Day Public Comment Draft Proposed Methodologies

Attachment A



October 18, 2011

Greg Chew, Senior Planner
Sacramento Area Council of Governments
1415 L Street, Suite 300
Sacramento, CA 95814

RE: 2013 - 2021 Regional Housing Needs Allocation

Dear Mr. Chew:

Thank you for the opportunity to provide input on the pending 2013-2021 Regional Housing Needs Allocation (RHNA) process for the SACOG region. The City of Winters appreciates the chance to work collaboratively with SACOG and other jurisdictions in the region in developing and selecting an allocation methodology that makes sense and builds on past planning activities. This letter serves to assert the City's preferred methodology for the process.

In SACOG's 2013-2021 RHNA Public Review document dated September 15, 2011, SACOG staff states that funding available for transportation projects in the region for this MTP cycle is limited. As a result, SACOG must maximize the benefit of these funds. To accomplish this mission, funding for new transit investment will be focused on areas of the region where housing growth is planned at transit-supportive densities (medium and high). In addition, new transit in the MTP/SCS will also be focused on connecting to job centers, around which new housing is also being planned.

For the past twenty years, Winters has struggled to encourage economic development and attract business due to its rural location. Therefore, Winters lacks a thriving job center, which leads to the imbalance of jobs available in the city limits per household. Moreover, Winters is not located in a transit priority area as defined by SACOG. With the exception of several bus stops in the city, Winters does not offer the variety or frequency of transit service available in the urban areas within the SACOG region. Consequently, Winters cannot effectively compete for transit funding based on SACOG's efforts to focus the funds towards job centers and areas planned for medium to high density housing.

Staff understands that SACOG must carefully balance the objectives of both state housing element law and SB 375 when developing a methodology. Staff believes that all five methodologies attempt to create that balance; however, staff has determined that the "apples to oranges" comparison of urban and rural municipalities can only be lessened through Methodology F. The application of the jobs/housing ratio and proximity to transit adjustment factors places affordable housing where there is a higher proportion of jobs and in areas where transit service exists or is planned for, which is consistent with SB 375. As a

318 First Street
Winters, CA 95694
Phone.530.795.4910
Fax. 530.795.4935

COUNCIL MEMBERS
Harold Anderson
Michael Martin
Tom Stone

MAYOR
Woody Fridae
MAYOR PRO TEM
Cecilia Aquiar-Curry

CITY CLERK
Nanci Mills
TREASURER
Michael Sebastian

CITY MANAGER
John W. Donlevy, Jr.

result, Methodology F helps to equalize the allocation based on the advantages (and disadvantages) of the municipalities' location and/or urban or rural classification. For these reasons, the City of Winters recommends that the SACOG Board adopt Methodology F.

It is important to note that the City of Winters has been committed to promoting actual production of affordable housing to all economic segments of our community. As of August 2011, 73 new multi-family units have been entitled, constructed and occupied. Of the 73 units, 19 units were designated affordable to extremely low income households, 19 units were designated for very low households while 35 units were designated affordable to low income households. This accomplishment exemplifies that the City's commitment to affordable housing goes beyond planning.

In addition to the 73 units, 39 affordable multi-family units were rehabilitated in 2011 with assistance from the City. This apartment complex was at risk of losing its affordability covenants because the former owners wanted to sell the project and there was a possibility that a buyer would not want to continue the affordability. While the City of Winters understands that rehabilitated units cannot be counted toward the allocation for this current planning period, the City believes that the success of saving this complex through financial assistance and, ultimately, rehabilitation should be considered by both SACOG and the Department of Housing and Community Development when allocating housing units in the future.

The City of Winters appreciates the efforts of SACOG staff to actively solicit the participation and input of the local planners in the effort to develop the RHNA allocation methodology. The City of Winters looks forward to continuing this open and collective process. Please contact Dan Maguire at (530) 795-4910 ext. 118 should you have any questions or need additional information.

Sincerely,

Woody Fridae, Mayor
City of Winters

CC: John W. Donlevy, Jr., City Manager
Nelia C. Dyer, Community Development Director
Dan Maguire, Housing Programs Manager
Winters City Council
Winters Planning Commission
File

Attachment B

Sacramento Area Council of Governments (SACOG)
2013-2021 Regional Housing Needs Allocation (RHNA)
60-DAY PUBLIC COMMENT DRAFT PROPOSED METHODOLOGIES
(Approved for Release on September 15, 2011)

This document describes five Regional Housing Needs Allocation (RHNA) methodologies the SACOG Board of Directors approved for public comment review. This document provides a summary of the RHNA process and the creation of the methodologies. For a more detailed explanation of the process and frequently asked questions, visit the RHNA webpage: www.sacog.org/rhnp.

Written public comments will be accepted by SACOG through Monday, November 14, 2011. Comments received will be included as part of the packet submitted to the SACOG Board of Directors for review. The Board is anticipated to approve one of these methodologies with or without alteration at its December 15, 2011 meeting.

Comments may be submitted to: Greg Chew, SACOG Senior Planner, 1415 L Street, Suite 300, Sacramento, CA 95814, or via email at gchew@sacog.org. Again, comments must be received no later than Monday, November 14, 2011.

RHNA Background: Every eight years, the State of California, through the Housing and Community Development Department (HCD), issues a Regional Housing Needs Determination to SACOG's six-county region. 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 for the next eight year planning period. This RHNA period covers January 1, 2013 to October 31, 2021. SACOG worked with HCD to develop a draft RHNA earlier than required by law to ensure coordination between the MTP/SCS projections and the RHNA projection. Although SACOG had not received its official letter of determination at the time of the Board's action to release these methodologies, HCD informed SACOG in mid-June 2011 that its overall RHNA is in a range starting at 105,000 units during the planning period. Of this amount, 41,830 or 39.838% of the units must be affordable. These figures are subject to change until SACOG receives the official letter of determination from HCD.

Based on the regional determination provided by HCD, SACOG must develop a Regional Housing Needs Allocation (RHNA) and a Regional Housing Needs Plan (RHNP). After the RHNA and RHNP are adopted by the SACOG Board, local jurisdictions are required to update their housing elements to reflect the RHNA. State housing element law (Gov. Code Sections 65580 et

seq.), requires each local jurisdiction to show how its housing element intends to zone enough overall units during the RHNA period. It must also show how it will zone enough higher density units and/or deed-restricted units, or take other steps, to meet the allocation of affordable units.

Creating and adopting a methodology for distributing the regional determination to each jurisdiction in the region is the basis for the RHNA. The methodology, ultimately adopted by the SACOG Board, must be a formula for distributing the number of housing units in each jurisdiction in the six-county Sacramento region (El Dorado, Placer, Sacramento, Sutter, Yolo, and Yuba counties) and must provide capacity for during the RHNA period. Unlike in other SACOG processes, the RHNA includes the Tahoe Basin in El Dorado and Placer counties. The adopted methodology must be consistent with objectives of the state housing element law, which requires all jurisdictions to provide a mix of housing types for a diverse income range, and to avoid the overconcentration of affordable income populations. In addition, SB 375 (Chapter 728, Statutes of 2008) requires that the RHNA methodology be consistent with the land use pattern in the region's Sustainable Communities Strategy (SCS).

The methodology will provide each of the cities and counties in the region with two allocations: (1) an overall housing unit allocation for the RHNA planning period; and (2) a sub-allocation for each of the four income categories defined by state law (and defined below). The sub-allocations for the four income categories add up to the total overall allocation. The two lowest, the Very Low Income and Low Income categories, are considered the "affordable categories." For purposes of this memorandum, SACOG combines the calculations of the Very Low and Low Income categories and refers to them as the "affordable allocation."

Public Process for the RHNA Methodology: Public comments must be received by SACOG within 60 days of release. Following the 60-day public comment period, the SACOG Board may make any revisions to the proposed methodology that are deemed appropriate in response to public comments, and then adopt a final methodology. The Board is anticipated to select, possibly modify and approve a methodology at its December 15, 2011 meeting. After the final methodology is adopted, it will be applied to the official RHNA once it is provided by HCD. In early 2012, the SACOG Board will review the official draft allocation for the jurisdictions in the region. However, for the benefit of the Board and stakeholders, SACOG staff is releasing preliminary draft allocations associated with each methodology.

Key Terms Explained

- **Region:** for RHNA purposes, SACOG includes El Dorado, Placer, Sacramento, Sutter, Yolo and Yuba counties, including the Tahoe Basin in El Dorado and Placer counties.

- **Income Categories:** state housing element law defines four income categories: very low, low, moderate, and above moderate. Each is defined by comparing median family income (MFI) to a household with the same number of members in the same county. “Very low” income households have incomes 50 percent or lower than MFI. “Low” income households have incomes between 50 percent and 80 percent of MFI. “Moderate” income households have incomes between 80 percent and 120 percent of MFI. “Above moderate” income households have incomes greater than 120 percent MFI.
- **Affordable Income Categories:** very low and low income categories combined.
- **Regional Average of Affordable Housing Units:** percentage of housing units in the region that fall into the affordable income categories. This number is expected to be 39.838% according to HCD, which uses the five-year 2005-2009 American Community Survey data.
- **Regional Income Parity:** all jurisdictions in the region have the same proportion of affordable income households as the regional average. When describing how to achieve “regional income parity by 2050,” this document is referring to what percentage of total units a jurisdiction would need to meet the regional average by 2050. This percentage is different for each jurisdiction, as they currently have different affordable income shares and different growth rates.
- **Affordable Base:** the calculation of affordable units each jurisdiction starts with. It is 39.838% of a jurisdiction’s overall allocation, which is the percentage of affordable income households in the region.
- **Non-Affordable Base:** the calculation of moderate and above moderate income units each jurisdiction starts with. It is 60.162% of a jurisdiction’s overall allocation (100% minus 39.838%), which is the combined percentage of moderate and above moderate-income households in the region.
- **Adjustment Factor:** a calculated number that adjusts allocations based on the objective the factor seeks to address. For instance, the **income adjustment factor** compares the percent share a jurisdiction has of affordable income housing units versus the regional average. The **jobs-housing ratio adjustment factor** compares each jurisdiction’s jobs/housing ratio for projected growth between 2008-35 to the regional jobs/housing ratio of projected growth during that same time. The **transit service area adjustment factor** is the percent of a jurisdiction’s projected housing unit growth between 2008-35 that is within transit priority areas (e.g., a half-mile radius of a major transit stop or high quality transit corridor).

- **Variance:** the numerical difference between a jurisdiction and the regional average for the three measured characteristics (jobs/housing ratio, transit service area, and income). The variance is either multiplied by the “affordable base”, “non-affordable base” or the 2050 Income Trendline to determine an adjustment factor.
- **2050 Income Trendline:** the percent share of a jurisdiction’s new growth that must be affordable during the 2013-21 RHNA cycle for the jurisdiction to reach the regional average of affordable units by 2050.
- **CHAS** – Comprehensive Housing Affordable Strategy data provided by the U.S. Housing and Urban Development Department. This is a special tabulation of Census data from the US Census Bureau geared towards housing planners and policy makers. The primary purpose of the CHAS data is to demonstrate the number of households in need of housing assistance. One way in which they do this is to provide the number of households by household size that fall within 30, 50 and 80 percent of local median income. This data differs from traditionally available Census data that depicts household income without accounting for household size. For more information please visit: http://www.huduser.org/portal/datasets/cp/CHAS/bg_chas.html.

Process of Methodology Development

Metropolitan Transportation Plan/Sustainable Communities Strategy: The starting point for all four proposed methodologies is the Draft Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS). In June 2011, the SACOG Board endorsed the 2035 Draft Preferred Scenario for use in analyzing and completing the MTP/SCS, which includes a jurisdiction-level land use allocation for housing and employment growth and a proposed transportation project list. The 2035 Draft Preferred Scenario land use assumptions are reflective of ongoing coordination with local agency planning staff, extensive data collection, alternatives analysis, public involvement, and Board direction. After completing the 2035 Draft Preferred Scenario, staff began work on a 2020 Draft Preferred Scenario that begins with the 2035 Draft Preferred Scenario and works backwards to a reasonable estimate of housing and employment growth, and transportation projects, by 2020, based on the total regional growth forecasted for the region between 2008 and 2020.

In creating the land use assumptions for the MTP/SCS, staff considered the location, type, and amount of development in the region. In developing the growth pattern, staff considered local policies and plans, state and federal regulations (on such issues as flood or habitat constraints), and market and economic conditions. The result is a land use pattern that reflects the Blueprint smart growth principles and is a reasonable assumption for development. The transportation

investments pair with the land use assumptions of projected development, resulting in transportation and air quality benefits such as fewer vehicle miles traveled, reductions in passenger vehicle greenhouse gas emissions, greater access and mobility, and increases in transit, walking, and biking.

The funding available for transportation projects in the region in this MTP cycle is \$5 billion less than in the last MTP due largely to lower population growth rates and the long-term effects of the recent recession. As a result, the amount of money dedicated to transit, although increased in share in this MTP, is still considerably less in absolute numbers than what was assumed in the last MTP. This makes it very important for SACOG to maximize the benefit of these funds. New transit investment is focused on areas of the region where housing growth is planned at transit-supportive densities (medium and high densities). New transit in the MTP/SCS also focuses on connecting to job centers, around which new housing is also being planned. The outcomes of this include a reduction in vehicle miles traveled and greenhouse gas emissions, an increase in “farebox recovery” (the ability for fares to pay for the full operating cost of transit), increased transportation mobility for a greater number of people, and, most importantly from a RHNA perspective, new high-quality transit service to existing concentrations of low-income residents. This increases overall affordability, when the costs of housing and transportation are considered together. Locating housing near jobs centers, services near low-income communities, and non-auto transportation alternatives to low-income communities are important social equity considerations included in the MTP/SCS land use pattern and growth assumptions.

In preparation for developing the MTP/SCS 2020 Draft Preferred Scenario, SACOG staff met with each jurisdiction at countywide meetings to discuss the state-mandated factors that must be considered in developing the RHNA. All of the information provided to SACOG in the RHNA factors meetings was considered in the development of the 2020 Draft Preferred Scenario. Those RHNA-specific factors are summarized below as:

- Existing and projected jobs and housing relationship;
- Opportunities and constraints to development of additional housing, including:
 - Lack of capacity for sewer and water due to federal or state laws, regulations or regulatory actions, or supply and distribution decisions made by a sewer or water service provider that preclude the jurisdiction from providing necessary infrastructure for additional development during the planning period;
 - 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 (SACOG may not limit its consideration based on the jurisdiction's existing zoning ordinances and land use restrictions);

- 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;
 - County policies to preserve prime agriculture lands within an unincorporated area;
 - Distribution of household growth assumed for a comparable period in the regional transportation plan and opportunities to maximize the use of public transportation and existing transportation infrastructure;
- Market demand for housing;
 - Agreements between a county and cities in the county to direct growth toward incorporated areas of the county;
 - Loss of units contained in assisted housing developments;
 - High housing cost burdens;
 - Housing needs of farmworkers;
 - Housing needs generated by the presence of a private university or a campus of the California State University or the University of California; and
 - Any other relevant factors, as determined by SACOG.

Since the information relating to many of these factors was similar for all jurisdictions due to the recent recession (e.g., decreased market demand for housing of all types), SACOG focused on information that was unique to each jurisdiction. For example, a proposed development without some or all of the necessary infrastructure is not unique, as most new developments require infrastructure investments. Therefore, all proposed developments without all necessary infrastructure are compared against other developments in the same submarket in determining the new housing absorption rate by 2020. However, a proposed development located in a floodplain that is lacking the levee improvements needed to allow development is a unique factor that would affect the absorption rate of the housing growth for that individual development in the MTP/SCS 2020 Draft Preferred Scenario.

Regional Housing Needs Allocation Methodology: After receiving the draft Regional Housing Needs Determination from HCD, SACOG staff distributed two potential methodologies (described later as Methodologies A and B) and corresponding draft allocations to the SACOG Planners Committee. The Planners Committee is comprised of local government planning staffs, housing advocates, and other interested parties from the region. The two additional draft methodologies proposed here (described later as Methodologies D and F) reflect many of the comments from the Planners Committee. Not all ideas discussed could be converted into a methodology due to lack of available data.

Two additional methodologies were proposed from non-SACOG staff. At the August 23, 2011 Planners Committee, one participant proposed a Methodology E, which the SACOG Board choose not to release for public review. At the September 1, 2011 Land Use and Air Quality Committee meeting, public comment proposed a new methodology, described as Methodology C below.

The use of incentives, such as priority for funding or other incentives, for local governments that are willing to accept a higher share than proposed in the draft allocation was briefly discussed at the Planners Committee. However, because the methodologies are still under consideration at this time, no further discussions on incentives have been conducted.

For further background on the RHNA process, visit the RHNA webpage at <http://www.sacog.org/rhnp/rhna.cfm>.

Proposed Methodologies - Summary

The SACOG Board of Directors at its September 15, 2011 meeting approved releasing five potential methodologies (Methodologies A, B, C D and F) for public release and comment; Methodology E) was not approved for release and is therefore not included in this document. The five publicly released methodologies begin with the same total allocation for each jurisdiction. Each jurisdiction receives the same percentage of the region's draft RHND (105,000 units) as assumed in the MTP/SCS 2020 Draft Preferred Scenario. This is referred to as the "overall allocation" in each methodology. The difference in the methodologies is only in how they allocate the affordable units; each emphasizes or addresses different planning policy objectives. They are summarized in the remainder of this document.

Methodology A

Summary: This is the methodology SACOG used for the 2006-13 RHNA. The methodology creates a trendline for each jurisdiction to determine what percent of new growth must be

affordable in that jurisdiction in order for all jurisdictions to meet the regional average of affordable housing units by 2050. In other words, those jurisdictions that currently have a higher proportion of affordable housing units, when compared to the current regional average, would receive a lower proportional share of affordable units compared to the average. Conversely, jurisdictions that currently have a lower share of affordable units, when compared to the regional average, would receive a higher percentage of affordable units.

How It Works: This method determines the allocation of affordable units by drawing an “income trendline” from 2008 to 2050, referred to as the “**2050 income trendline.**” On one endpoint, the 2006-2008 Census American Community Survey (ACS) shows the percentage of households that a jurisdiction has in each of the four income categories as of 2008. The other endpoint, 2050, shows the projected regional average percentage of households in each income category as determined by HCD; again, the affordable income categories are 39.838 percent. The 2050 income trendline is drawn connecting these two points – the jurisdiction’s current affordable income percentage share of affordable income housing units in 2008 to the 39.838 percent of its housing units in 2050. This line is then intersected at October 31, 2021, the end period for this RHNA cycle. The point of intersection is the percentage of growth that the jurisdiction would need of new affordable housing units to be trending toward the regional average of affordable housing units by 2050. This percentage (see **Column B in Table 1**) is multiplied by the jurisdiction’s overall allocation (**Column A**) to determine the jurisdiction’s affordable income allocation (**Column C**). The resulting formula is:

$$\text{affordable allocation} = \text{overall allocation} * 2050 \text{ income trendline}$$

Note: this method places a 4 percent floor and 30 percent ceiling in both low and very low income categories (or a total floor of 8% and 60% ceiling for total affordable units) – these floor and ceiling limits were used during the 2006-13 RHNA cycle.

Analysis: The methodology used in 2006-13 was based solely on moving each jurisdiction towards regional income parity in terms of its share of affordable housing. As a result, this methodology does not consider the planning principles or other social equity factors built into the land use and transportation assumptions of the MTP/SCS in its affordable allocation. One potential disadvantage to using this methodology with the new MTP/SCS land use and transportation assumptions would be locating existing and future lower income residents away from jobs, services, and transit.

Methodology B

Summary: This methodology starts all jurisdictions at a percentage of affordable units equal to the percentage of existing affordable income households in the region. It then applies an adjustment factor based on regional income distribution disparities. Similar to the concept in Methodology A, the adjustment factor adds future affordable units to jurisdictions that currently have lower than the regional average and subtracts future affordable units from jurisdictions that have higher than the regional average. This methodology moves all jurisdictions towards achieving the regional average, but rather than every jurisdiction achieving regional parity by 2050, each jurisdiction will reach the regional average at different points in time.

How It Works: It uses a two-step process. Step 1 establishes the “**affordable base**” number. Step 2 applies an adjustment factor to move household income distributions toward regional equity. In other words:

overall allocation*regional average of affordable units = affordable base

then,

affordable allocation = affordable base +/- income adjustment

Step 1 distributes evenly the regional percentage of affordable units to each jurisdiction. The affordable income category adds up to 39.838 percent for the region, as determined by HCD. In this methodology, every jurisdiction’s “**base**” or “**affordable base**” number is calculated by multiplying 39.838 percent by the jurisdiction’s overall allocation number (**See Table 2; Column A multiplied by Column C**).

Step 2 is a two-part process (2a and 2b) to adjust the affordable base allocation by a factor that addresses regional income parity. In other words, the adjustment factor trends all jurisdictions towards the regional average of affordable housing units (39.838%).

Step 2a is exactly the same methodology used in Methodology A (see above). Using the “**2050 income trendline**,” the result of Step 2a shows the percentage of growth that the jurisdiction would need of new affordable housing units to be trending toward the regional average of affordable housing units by 2050.

Step 2b compares the resulting percentage in Step 2a against the regional average of affordable households (39.838%). The difference, the “**income variance**,” is expressed as a percentage (**Table 2, Column E**). A jurisdiction that has a percentage from Step 2a that is lower than 39.838

percent, means that jurisdiction has a higher percentage share of affordable units than the regional average and, therefore, to get to regional income parity in 2050, it would need less than the regional average between now and 2050. Such a jurisdiction would receive a negative income adjustment factor number (**Column D**). Conversely, a jurisdiction with a lower share of affordable units when compared to the regional average, would receive a higher percentage than the regional average between now and 2050. Note that Step 2a also places a 4 percent floor and 30 percent ceiling (or “guardrails”) in low and very low-income categories, as described in Methodology A.

Step 2b subtracts the calculated result in Step 2a (**Column D**) from 39.838 percent. The difference (**Column E**), expressed as a percent, is the “variance” from the regional average of affordable housing units. The variance is multiplied by the affordable base number (**Column E times Column B**), and the product is the “income adjustment factor” (**Column F**). The adjustment factor is then added or subtracted to the affordable base (remember that an adjustment factor can be negative). The resulting number (**Column G**) is the number of affordable units allocated for that jurisdiction. **Column H** shows the percentage of each jurisdiction’s percentage of affordable units compared to its overall allocation.

Although Methodology B differs from the previous methodology, steps 2a and 2b incorporate the same concept used in Methodology A, the 2006-2013 RHNA methodology.

Analysis: This is the SACOG staff’s preferred methodology. It focuses on the regional land use pattern and where transportation infrastructure investments will be made. Locating jobs and services near low-income communities and providing non-auto transportation alternatives to these areas is an important social equity consideration that is included in the MTP/SCS land use pattern and growth assumptions. One way to ensure consistency between the MTP/SCS and RHNA is to keep the land use assumptions of the MTP/SCS intact as the starting point for not just the overall allocation, but for the affordable allocation as well. Draft Methodology B equally distributes the number of affordable income units to each jurisdiction, thereby preserving the distribution of housing growth among jurisdictions. To balance this goal with another state housing law objective to avoid over-concentrating affordable income housing, draft Methodology B then applies an adjustment factor to the affordable incomes units in each jurisdiction. The adjustment factor is based on the methodology from the 2006-13 RHNA methodology, which aims to move all jurisdictions towards regional income parity in terms of their share of affordable housing units. One potential disadvantage to this methodology is that it changes the rate by which jurisdictions achieve regional income parity.

Methodology C

Summary: This methodology addresses two specific factors in the land use pattern of the MTP/SCS – jobs/housing ratio and transit priority areas – in addition to income distribution.

This methodology uniformly starts all jurisdictions with the number of affordable units from the **2050 income trendline allocation** described in Methodology A. However, this methodology uses three adjustment factors to add or subtract from the base affordable allocation. The three factors are based on a jurisdiction’s variance from a regional average condition for the following three planning factors: (a) the ratio of jobs to housing units (jobs-housing balance); (b) the percentage of housing units within a transit priority area (transit proximity); and (c) the current regional share of affordable income households (income equity). Each jurisdiction’s current metric for each of these three factors is compared to the regional average. The difference (expressed as a percentage) is divided in half and then each is multiplied by the 2050 income trendline allocation. These three adjustment factors are either added to or subtracted from the base allocation for each jurisdiction.

How It Works: This methodology is summarized in a multi-step process as follows:

$$\begin{aligned} \text{affordable allocation} = & \\ & \text{2050 income trendline base} \\ & \text{+/- adjustment \#1 (income equity)} \\ & \text{+/- adjustment \#2 (jobs/housing ratio)} \\ & \text{+/- adjustment \#3 (transit proximity)} \end{aligned}$$

where “2050 income trendline base” = overall allocation * 2050 income trendline

The “**income equity adjustment**” examines the regional income disparities by comparing the percentage share each jurisdiction has of very low + low income households to the regional average. **Column E** shows information from CHAS (through the US Housing and Urban Development Department - HUD) on the percentage share of these households in each jurisdiction as of 2008 (the latest available data). The regional average is 39.838 percent, and is subtracted from **Column E** to determine the difference (**Column F**). The difference is divided in half (**Column F divided by 2**), and the result is **Column G**, which is multiplied by the “**2050 income trendline base**” (**Column D**). The product is **Column H**, which is the “**income adjustment factor**.”

The “**jobs/housing ratio adjustment**” compares each jurisdiction’s current ratio of jobs to housing to the regional jobs/housing average. **Column J** shows SACOG’s estimated

jobs/housing ratio for each jurisdiction's growth in the MTP/SCS. The regional average, 1.2, is subtracted from **Column J** to determine the difference (**Column K**). The difference is divided in half (**Column K divided by 2**), and the result is **Column L**, which is multiplied by the "2050 income trendline base" (**Column D**). The product is **Column M**, which is the "jobs/housing adjustment factor."

The "transit service area" is the percent of projected housing unit growth a jurisdiction has in a transit priority area in the MTP/SCS by 2035 compared to the regional average for this measure. **Column O** shows SACOG's estimated new housing growth between 2008 and 2035 within each jurisdiction that will be in a transit priority area. The regional average, 38 percent, is subtracted from **Column O** to determine the difference (**Column P**). The difference is divided in half (**Column P divided by 2**), and the result is **Column Q**, which is multiplied by the "2050 income trendline base" (**Column D**). The product is **Column R**, which is the "jobs/housing adjustment factor".

After all three adjustment factors have been calculated, the 2050 income trendline base and the three factors are added together (**Columns D + Column H + Column M + Column R**) to determine the affordable allocation for each jurisdiction (**Column U**). **Column V** shows the allocation as adjusted to fit the exact allocation of affordable units determined by HCD.

Analysis: In Draft Methodology C, each jurisdiction receives a base allocation derived from the 2050 income trendline, which seeks to trend all jurisdictions to have the same proportion of low and very low income housing units by 2050. This methodology then makes adjustments for factors addressed in the MTP/SCS – jobs/housing ratio and transit service – plus the state housing element law – income distribution. The household income factor strengthens the effect of the 2050 trendline, in which jurisdictions with fewer low income units get higher shares and conversely jurisdictions with higher than average low income units get lower shares.

The data used for jobs/housing ratio and transit service is derived directly from the MTP/SCS land use pattern combined with projected transportation and transit investments. Each jurisdiction's allocation is adjusted according to how far it is from the regional average.

This methodology places affordable housing where there is a higher proportion of jobs and in areas where transit service exists or is planned for, while also shifting affordable housing to communities that have a lower proportion of them. One potential disadvantage to this methodology is an over-weighting of the MTP/SCS land use pattern and the 2050 income trendline. This methodology will add more units to jurisdictions starting with a high base allocation and remove units from jurisdictions with a low base allocation, essentially diminishing the impact that the MTP/SCS land use assumptions will have on the affordable income unit allocation.

Methodology D

Summary: This methodology is a variation of Methodology B. The difference is that this methodology makes the adjustment factor for income inequities more pronounced than in Methodology B. Similar to Methodology B, the “affordable base” is the starting point of affordable units, which is 39.8 percent of the overall allocation for all jurisdictions. In Method B, the adjustment factor is created by determining the variance between percentage of affordable units versus the regional average, and then multiplying that by the “affordable base” (as opposed to multiplying by the overall allocation as in Methodology B). In this variation, Methodology D multiplies the variance by the “non-affordable” base, which is 60.2 percent of the overall allocation (100% - 39.8% = 60.2%, or the percentage of region’s moderate and above moderate income units). The outcome is that jurisdictions that currently have a smaller percentage share of low-income housing than the regional average would receive an increased allocation of affordable units that is more pronounced than in Methodology B. Conversely, jurisdictions currently with a higher share of affordable units than the regional average would receive a more pronounced lower share.

How It Works: Everything is the same as Methodology B, from its intent to the mathematical steps to derive the allocation, except one variation, which can be summarized as:

$$\text{affordable allocation} = \text{affordable base} + [\text{income variation} * \text{non-affordable base}]$$

In Methodology B, the “affordable base” is the starting point of affordable units, which is 39.838 percent of the overall allocation for all jurisdictions (**Table 4, Column A times 39.838%**). As in Methodology B, Methodology D creates a “2050 income trendline” (see Methodology A above for description) which is shown in **Column D**. **Column D** subtracts the regional average of 39.838 percent to determine the variance, **Column E**. This is consistent with Methodology B.

Methodology D differs when it multiplies **Column E** times the “non-affordable base,” which are the number of units that are not considered low or very low income. Because the regional average and the “affordable base” for all jurisdictions is 39.838 percent, then the “non-affordable base” is 60.162 percent of each jurisdictions overall allocation (**Column A multiplied by 60.162**). The result is **Column F**, which becomes the “non-affordable adjustment factor.” It is then added to the “affordable base,” or **Column F** plus **Column C** equals the affordable allocation (**Column G**). **Column H** shows the percent of each jurisdiction’s overall allocation that would be affordable.

Analysis: Methodology D has a more pronounced adjustment factor for adjusting for income disparities than Methodology B, but otherwise the advantages and disadvantages are the same

as those in Methodology B.

Methodology E

Methodology E was not approved for public release by the SACOG Board. Its associated allocation chart, Table 5, is not included in this document.

Methodology F

Summary: *Note: Methodology F was originally presented as “Methodology C” to the three board committees and the Planners Committee in September*

This methodology addresses two specific factors in the land use pattern of the MTP/SCS – jobs/housing ratio and transit priority areas – in addition to income distribution.

Like Methodology B, this methodology uniformly starts all jurisdictions with the same regional percentage of overall units as the “**affordable base**” allocation. However, this methodology uses three adjustment factors to add or subtract from the base affordable allocation. The three factors are based on a jurisdiction’s variance from a regional average condition for the following three planning factors: (a) the ratio of jobs to housing units (jobs-housing balance); (b) the percentage of housing units within a transit priority area (transit proximity); and (c) the current regional share of affordable income households (income equity). Each jurisdiction’s current metric for each of these three factors is compared to the regional average. The difference (expressed as a percentage) is divided in half and then each is multiplied by the base allocation. These three adjustment factors are either added to or subtracted from the base allocation for each jurisdiction.

How It Works: This methodology starts with the same first step by distributing the same “affordable base” described in Methodology B (that is, every jurisdiction starts with 39.838 percent of its overall allocation as affordable). However, this methodology differs in that Step 2 has three adjustment factors, not one (as in Methodology B). Step 2 is to apply the adjustment factors to address regional equity for the affordable income allocations. Or, in other words:

overall allocation*regional average of affordable units = affordable base

then,

affordable allocation = affordable base +/- adjustment #1 +/- adjustment #2 +/- adjustment #3

where adjustment #1 is income equity, adjustment #2 is jobs/housing balance, and adjustment #3 is transit proximity.

The “**income adjustment**” examines the regional income disparities by comparing the percentage share each jurisdiction has of very low and low income households to the regional average. In **Table 6, Column E** shows information from CHAS (through the US Housing and Urban Development Department - HUD) on the percentage share of these households in each jurisdiction as of 2008 (the latest available data). The regional average is 39.838 percent, and is subtracted from **Column E** to determine the difference (**Column F**). The difference is divided in half (**Column F divided by 2**), and the result is **Column G**, which is multiplied by the “**affordable base**” (**Column D**). The product is **Column H**, which is the “**income adjustment factor.**”

The “**jobs/housing ratio adjustment**” compares each jurisdiction’s current ratio of jobs to housing to the regional jobs/housing average. **Column J** shows SACOG’s estimated 2035 jobs/housing ratio for each jurisdiction’s growth in the MTP/SCS. The regional average, 1.2, is subtracted from **Column J** to determine the difference (**Column K**). The difference is divided in half (**Column K divided by 2**), and the result is **Column L**, which is multiplied by the “**affordable base**” (**Column D**). The product is **Column M**, which is the “**jobs/housing adjustment factor.**”

The “**transit service area**” is the percent of projected housing unit growth a jurisdiction has in a transit priority area in the MTP/SCS by 2035 compared to the regional average for this measure. **Column O** shows SACOG’s estimated new housing growth between 2008 and 2035 within each jurisdiction that will be in a transit priority area. The regional average, 38 percent, is subtracted from **Column O** to determine the difference (**Column P**). The difference is divided in half (**Column P divided by 2**), and the result is **Column Q**, which is multiplied by the “**affordable base**” (**Column D**). The product is **Column R**, which is the “**jobs/housing adjustment factor.**”

After all three adjustment factors have been calculated, the affordable base and the three factors are added together (**Columns D + Column H + Column M + Column R**) to determine the affordable allocation for each jurisdiction (**Column U**). **Column V** shows the allocation as adjusted to fit the exact allocation of affordable units determined by HCD.

Analysis: In Draft Methodology F, each jurisdiction receives the same affordable base allocation as the region, then adjustments are made for factors addressed in the MTP/SCS – jobs/housing ratio and transit service – plus the State Housing Element Law – income distribution. The data used in this method is derived directly from the MTP/SCS land use pattern combined with projected transportation and transit investments. Each jurisdiction’s allocation is adjusted according to how far it is from the regional average. This methodology places affordable housing where there is a higher proportion of jobs and in areas where transit service exists or is planned for, while also shifting affordable housing to communities that have a lower proportion of them. One potential disadvantage to this methodology is an over-weighting of the MTP/SCS land use pattern. By starting with an affordable base allocation that is consistent with the MTP/SCS and then making further adjustments for MTP/SCS factors, this methodology will add

more units to jurisdictions starting with a high base allocation and remove units from jurisdictions with a low base allocation, essentially increasing the impact that the MTP/SCS land use assumptions will have on the affordable income unit allocation.

Table 1: Methodology A - Using 2006-13 Methodology Applied to 2013-21 RHNA Cycle
DISCUSSION DRAFT FOR September 15, 2011 SACOG Board Meeting - action is NOT being taken on these allocations
 RHNA Period : January 1, 2013 through October 31, 2021

Applying 2006-13 RHNA Methodology to 2013-21 RHNA Cycle			
	Total Projected Growth (Jan 1, 2013-October 31, 2021)	Very Low + Low Income Allocation (Jan 1, 2013- Oct 31, 2021)	
	Total number of Units (based on proportion of MTP/SCS 2020 projection)	2013-21 RHNA - Number of Very Low + Low units (Col A * Col C)	Percent of total units that are Very Low + Low
	A	B	C
Placerville	372	109	29.3%
South Lake Tahoe ¹	336	28	8.3%
El Dorado Uninc Tahoe Basin ¹	480	277	57.6%
El Dorado Uninc	3,949	1,702	43.1%
El Dorado County total	5,137	2,115	41.2%
Auburn	308	131	42.4%
Colfax	51	12	23.1%
Lincoln	3,791	1,794	47.3%
Loomis	154	73	47.1%
Rocklin	3,814	2,152	56.4%
Roseville	8,480	4,595	54.2%
Placer Uninc Tahoe Basin ¹	328	189	57.5%
Placer Uninc	4,704	2,622	55.7%
Placer County total	21,630	11,567	53.5%
Citrus Heights	696	203	29.2%
Elk Grove	7,404	4,248	57.4%
Folsom	4,634	2,420	52.2%
Galt	679	150	22.1%
Isleton	23	4	19.4%
Rancho Cordova	7,010	2,361	33.7%
Sacramento	24,108	6,635	27.5%
Sacramento Uninc	13,848	5,132	37.1%
Sacramento County total	58,402	21,154	36.2%
Live Oak	449	172	38.3%
Yuba City	2,680	1,055	39.4%
Sutter Uninc	335	162	48.2%
Sutter County total	3,464	1,389	40.1%
Davis	1,066	419	39.3%
West Sacramento	5,978	2,031	34.0%
Winters	320	134	42.0%
Woodland	1,878	538	28.7%
Yolo Uninc	1,891	687	36.3%
Yolo County total	11,133	3,810	34.2%
Marysville	72	6	8.1%
Wheatland	484	173	35.9%
Yuba Uninc	4,678	1,616	34.5%
Yuba County total	5,234	1,795	34.3%
SUM	105,000	41,830	39.8%

Sacramento Area Council of Governments

1 - Tahoe Basin allocations based on projections provided by the Tahoe Regional Planning Agency

Table 2: Methodology B - 2013-21 RHNA Allocation Using Draft Staff Proposal

DICUSSION DRAFT for September 15, 2011 Board Meeting - action is NOT being taken on these allocations

RHNA Period: January 1, 2013 through October 31, 2021

DRAFT PROPOSED METHODOLOGY B (Jan 1, 2013 to Oct 31, 2021 RHNA Cycle)								
Overall Allocation	Base Number: Equal Share for all Jurisdictions			Adjustment Factor: Regional Equity			Very Low+Low Income Allocations	
Total number of Units (based on proportion of MTP/SCS 2020 projection)	Base allocation for Very Low+Low (Col A * Col C)	Base Allocation Very Low + Low %	Targeted % of units distributed in VL+L by October 31, 2021 for regional parity by 2050	Income Variance from (Col D- 39.838%)	Adjust Factor (Col B*Col E)	Allocation VL + L units (Col B + Col F)	Allocation VL + L by Percent of Total (Col G/Col A)	
A	B	C	D	E	F	G	H	
			x=39.838%					
Placerville	372	148	39.8%	29.3%	-10.5%	-16	133	35.7%
South Lake Tahoe ¹	336	134	39.8%	8.3%	-31.5%	-42	92	27.3%
El Dorado Uninc Tahoe Basin ¹	480	191	39.8%	57.6%	17.8%	34	225	46.9%
El Dorado Uninc	3,949	1,573	39.8%	43.1%	3.3%	51	1,624	41.1%
El Dorado County total	5,137	2,046	39.8%	41.2%			2,074	
Auburn	308	123	39.8%	42.4%	2.6%	3	126	40.9%
Colfax	51	20	39.8%	23.1%	-16.7%	-3	17	33.2%
Lincoln	3,791	1,510	39.8%	47.3%	7.5%	113	1,623	42.8%
Loomis	154	61	39.8%	47.1%	7.3%	4	66	42.7%
Rocklin	3,814	1,519	39.8%	56.4%	16.6%	252	1,772	46.4%
Roseville	8,480	3,378	39.8%	54.2%	14.3%	485	3,863	45.6%
Placer Uninc Tahoe Basin ¹	328	131	39.8%	57.5%	17.7%	23	154	46.9%
Placer Uninc	4,704	1,874	39.8%	55.7%	15.9%	298	2,172	46.2%
Placer County total	21,630	8,617	39.8%	53.5%			9,792	
Citrus Heights	696	277	39.8%	29.2%	-10.6%	-29	248	35.6%
Elk Grove	7,404	2,950	39.8%	57.4%	17.5%	517	3,467	46.8%
Folsom	4,634	1,846	39.8%	52.2%	12.4%	229	2,075	44.8%
Galt	679	271	39.8%	22.1%	-17.8%	-48	222	32.8%
Isleton	23	9	39.8%	19.4%	-20.5%	-2	7	31.7%
Rancho Cordova	7,010	2,793	39.8%	33.7%	-6.2%	-172	2,621	37.4%
Sacramento	24,108	9,604	39.8%	27.5%	-12.3%	-1,183	8,421	34.9%
Sacramento Uninc	13,848	5,517	39.8%	37.1%	-2.8%	-153	5,364	38.7%
Sacramento County total	58,402	23,266	39.8%	36.2%			22,425	
Live Oak	449	179	39.8%	38.3%	-1.5%	-3	176	39.2%
Yuba City	2,680	1,068	39.8%	39.4%	-0.5%	-5	1,063	39.7%
Sutter Uninc	335	134	39.8%	48.2%	8.4%	11	145	43.2%
Sutter County total	3,464	1,380	39.8%	40.1%			1,384	
Davis	1,066	425	39.8%	39.3%	-0.5%	-2	423	39.6%
West Sacramento	5,978	2,382	39.8%	34.0%	-5.9%	-140	2,242	37.5%
Winters	320	127	39.8%	42.0%	2.2%	3	130	40.7%
Woodland	1,878	748	39.8%	28.7%	-11.2%	-84	665	35.4%
Yolo Uninc	1,891	753	39.8%	36.3%	-3.5%	-26	727	38.4%
Yolo County total	11,133	4,435	39.8%	34.2%			4,186	
Marysville	72	29	39.8%	8.1%	-31.7%	-9	20	27.2%
Wheatland	484	193	39.8%	35.9%	-4.0%	-8	185	38.3%
Yuba Uninc	4,678	1,864	39.8%	34.5%	-5.3%	-99	1,765	37.7%
Yuba County total	5,234	2,085	39.8%	34.3%			1,969	
SUM	105,000	41,830	39.8%	39.8%		0	41,830	39.8%

Sacramento Area Council of Governments

1 - Tahoe Basin allocations based on projections provided by the Tahoe Regional Planning Agency

Table 3: Methodology C - Three Adjustment Factors with 2050 Trendline Affordable Base DISCUSSION DRAFT FOR September 15, 2011. SACOG Board Meeting - action is NOT being taken on these allocations
 RHNA Period: January 1, 2013 through October 31, 2021

Overall Allocation 2013-2021	2050 Income Trend Line Base Allocation (see Table 1, Col B)	Adjustment Factor A: INCOME										Adjustment Factor B: Jobs/Housing Balance										Adjustment Factor C: Proximity to Transit										A+B+C			V-L-H Method C			V-L-H Method C		
		% Households in VI + I (CHAS data)	Variance from 38.838%	Half of Variance (Col F * 50%)	Adjustive nt Factor *2050 Trendline Afford Base (Col G*Col D)	H	J	K	L	M	O	P	Q	R	T	U	V	W	Factors A, B and C combined	V-L-H Method C Trendline Affordable BASE +3 Adjust Factors	V-L-H Method C match HCD Target = Very Low + Low Allocation %	V-L-H Method C match HCD Target = Very Low + Low Allocation %																		
REGIONAL GOAL		n=39,838%										region ave = 1.2										region ave=38%										T	U	V	W	T	U	V	W	
Pleaserville	372	46.5%	-6.7%	-3.4%	-4	0.7	-0.5	-25.0%	-27	0.0%	-38.0%	-19.0%	-21	-52	57	60	16.1%	-52	57	60	16.1%																			
South Lake Tahoe ¹	336	51.3%	-11.4%	-5.7%	-2	unknown	unknown	unknown	0	unknown	unknown	unknown	0	-2	26	29	8.5%	-2	26	29	8.5%																			
El Dorado Uninc Tahoe Basin ¹	480	27.7%	26.8%	13.1%	6.5%	1.1	1.4	10.0%	170	0.0%	-38.0%	-19.0%	-323	18	295	298	62.1%	18	295	298	62.1%																			
El Dorado Uninc	3,949	1,702	26.8%	13.1%	6.5%	1.1	1.4	10.0%	170	0.0%	-38.0%	-19.0%	-323	-42	1,660	1,687	42.7%	-42	1,660	1,687	42.7%																			
El Dorado County total	5,137	2,115	32.1%	6.0%	0.0%	124	1.4	10.0%	170	0.0%	-38.0%	-19.0%	-323																											
Auburn	308	37.6%	2.2%	1.1%	1	0.7	-0.5	-25.0%	-33	9.0%	-29.0%	-14.5%	-19	-50	80	83	26.8%	-50	80	83	26.8%																			
Colfax	51	52.5%	-12.6%	-6.3%	-1	3.7	2.5	125.0%	15	0.0%	-38.0%	-19.0%	-2	12	24	24	46.8%	12	24	24	46.8%																			
Uninc	3,791	1,794	33.7%	6.1%	3.1%	55	0.9	-0.3	-15.0%	-269	0.0%	-38.0%	-19.0%	-555	1,239	1,265	33.9%	-555	1,239	1,265	33.9%																			
Yreaville	154	7.3%	32.1%	7.7%	3.9%	3	1.0	-0.2	-10.0%	-7	0.0%	-38.0%	-19.0%	-18	54	55	35.9%	-18	54	55	35.9%																			
Rocklin	3,844	2,152	36.2%	9.6%	4.8%	104	1.4	0.2	10.0%	215	14.0%	-24.0%	-258	61	2,213	2,230	58.7%	61	2,213	2,230	58.7%																			
Roseville	8,436	4,595	29.5%	10.3%	5.2%	238	1.6	0.4	20.0%	919	9.0%	-29.0%	-666	490	5,085	5,144	60.7%	490	5,085	5,144	60.7%																			
Pleaserville Tahoe Basin ¹	328	31.1%	8.7%	4.4%	8	unknown	unknown	unknown	0	unknown	unknown	unknown	0	8	197	199	60.7%	8	197	199	60.7%																			
Pleaserville Uninc	4,704	2,672	31.1%	8.7%	4.4%	114	1.0	-0.2	-10.0%	-262	0.0%	-38.0%	-498	-646	1,976	2,009	42.7%	-646	1,976	2,009	42.7%																			
Pleaserville County total	21,630	11,567	31.2%	0.0%	0.0%	523	1.0	-0.2	-10.0%	-262	0.0%	-38.0%	-498																											
Grass Valley	696	42.2%	-2.8%	-1.2%	-2	1.2	0.0	0.0%	0	64.0%	26.0%	13.0%	26	24	227	232	33.4%	24	227	232	33.4%																			
Elk Grove	7,404	26.1%	13.7%	6.9%	292	1.1	-0.1	-5.0%	-212	0.0%	-38.0%	-19.0%	-807	-728	3,570	3,571	48.2%	-728	3,570	3,571	48.2%																			
Folsom	4,634	24.2%	16.5%	8.3%	200	1.3	0.1	5.0%	121	7.0%	-31.0%	-15.5%	-375	-54	2,366	2,398	51.7%	-54	2,366	2,398	51.7%																			
Galt	679	46.1%	-6.3%	-3.1%	-5	1.0	-0.2	-10.0%	-15	0.0%	-38.0%	-19.0%	-28	-48	102	106	15.7%	-48	102	106	15.7%																			
Isleton	4	54.7%	-10.8%	-7.6%	0	0.5	-0.7	-35.0%	-2	0.0%	-38.0%	-19.0%	-1	-3	2	2	8.2%	-3	2	2	8.2%																			
Rancho Cordova	2,361	47.8%	-8.6%	-4.0%	-94	1.0	-0.2	-10.0%	-236	31.0%	-7.0%	-3.5%	-83	-413	1,943	1,996	28.5%	-413	1,943	1,996	28.5%																			
Sacramento	20,108	6,635	47.7%	-7.9%	-3.9%	-261	1.1	-0.1	-5.0%	-332	75.0%	37.0%	1,227	635	7,270	7,435	30.8%	635	7,270	7,435	30.8%																			
Sacramento Uninc	13,848	5,132	41.9%	-2.1%	-1.0%	-53	1.3	0.1	5.0%	257	57.0%	19.0%	488	691	5,824	5,919	42.7%	691	5,824	5,919	42.7%																			
Sacramento County total	58,402	21,154	42.0%	0.0%	0.0%	77	1.3	0.1	5.0%	257	57.0%	19.0%	488																											
Live Oak	449	38.1%	0.7%	0.3%	1	0.6	-0.6	-30.0%	-52	0.0%	-38.0%	-19.0%	-33	-84	88	92	20.4%	-84	88	92	20.4%																			
Yuba City	2,680	1,055	38.3%	0.5%	0.3%	3	1.3	0.1	5.0%	53	0.0%	-38.0%	-200	-145	910	929	34.7%	-145	910	929	34.7%																			
Sutter Uninc	335	1,62	30.6%	9.3%	4.6%	7	0.6	-0.6	-30.0%	-48	0.0%	-38.0%	-31	-72	90	92	27.5%	-72	90	92	27.5%																			
Sutter County total	3,464	1,389	37.5%	0.0%	0.0%	11	0.6	-0.6	-30.0%	-48	0.0%	-38.0%	-31																											
Davis	1,066	419	37.5%	2.3%	1.2%	5	1.1	-0.1	-5.0%	-21	80.0%	42.0%	88	72	491	499	46.8%	72	491	499	46.8%																			
West Sacramento	5,978	2,031	45.6%	-5.8%	-2.9%	-59	1.2	0.0	0.0%	0	82.0%	44.0%	447	388	2,419	2,460	41.1%	388	2,419	2,460	41.1%																			
Winters	320	134	34.3%	5.5%	2.8%	4	1.1	-0.1	-5.0%	-7	0.0%	-38.0%	-26	-29	106	108	33.8%	-29	106	108	33.8%																			
Woodland	1,878	538	44.4%	-4.5%	-2.3%	-12	1.4	0.2	10.0%	54	0.0%	-38.0%	-102	-61	478	490	26.1%	-61	478	490	26.1%																			
Yolo Uninc	1,691	667	41.9%	-2.6%	-1.0%	-17	1.9	0.7	35.0%	240	77.0%	39.0%	134	367	1,054	1,067	56.6%	367	1,054	1,067	56.6%																			
Yolo County total	11,133	3,810	41.7%	0.0%	0.0%	-69	1.9	0.7	35.0%	240	77.0%	39.0%	134																											
Wheatland	72	46.2%	-5.5%	-2.7%	0	2.2	1.0	50.0%	3	0.0%	-38.0%	-19.0%	-1	2	8	8	11.2%	2	8	8	11.2%																			
Yuba Uninc	484	173	40.9%	-1.1%	-0.5%	-1	0.8	-0.4	-20.0%	-35	0.0%	-38.0%	-307	-49	105	108	22.8%	-49	105	108	22.8%																			
Yuba County total	5,234	1,795	44.0%	-4.1%	-2.0%	-34	1.1	-0.1	-5.0%	-81	0.0%	-38.0%	-307	-421	1,195	1,227	26.2%	-421	1,195	1,227	26.2%																			
REGIONAL GOAL	105,000	41,830	39.8%			631			408	38%			-1,759	41,110	41,830	39.8%		41,110	41,830	39.8%																				

Sacramento Area Council of Governments
 1 - Tahoe Basin allocations based on projections provided by the Tahoe Regional Planning Agency

Table 4 - Methodology D: 2013-21 RHNA Allocation Using Methodology B Variation

DISCUSSION DRAFT FOR September 15, 2011 SACOG Board Meeting - action is NOT being taken on these allocations

RHNA Period : January 1, 2013 through October 31, 2021

METHODOLOGY D (Jan 1, 2013 to Oct 31, 2021 RHNA Cycle)										
Overall Allocation	Base Number: Equal Share for all Jurisdictions			Adjustment Factor: Regional Equity			Very Low+Low Income Allocations			
Total number of Units (based on proportion of MTP/SCS 2020 projection)	Affordable Base allocation for Very Low+Low (Col A * Col C)	Affordable Base Allocation Very Low + Low %	Non-Affordable Base = Moderate + Above Mod (Col A - Col B)	Targeted % of units distributed in VL+L by October 31, 2021 for regional parity by 2050	Income Variance from (Col D- 39.838%)	Adjustment Factor (Mod+Above Mod)*Variance (Col C2*Col E)	Allocation VL + L - Base + (Variance * Mod+Above Mod units) (Col B + Col F)	Allocation VL + L by Percent of Total (Col G/Col A)		
A	B	C1	C2	D	E	F	G	H		
Placerville	372	148	39.8%	224	x=39.838%	29.3%	-10.5%	-23	125	33.5%
South Lake Tahoe ¹	336	134	39.8%	202	8.3%	-31.5%	-64	70	20.9%	
El Dorado Uninc Tahoe Basin ¹	480	191	39.8%	289	57.6%	17.8%	51	243	50.5%	
El Dorado Uninc	3,949	1,573	39.8%	2,376	43.1%	3.3%	77	1,651	41.8%	
El Dorado County total	5,137	2,046	39.8%		41.2%			2,088		
Auburn	308	123	39.8%	185	42.4%	2.6%	5	127	41.4%	
Colfax	51	20	39.8%	31	23.1%	-16.7%	-5	15	29.8%	
Lincoln	3,791	1,510	39.8%	2,281	47.3%	7.5%	171	1,681	44.3%	
Loomis	154	61	39.8%	93	47.1%	7.3%	7	68	44.2%	
Rocklin	3,814	1,519	39.8%	2,295	56.4%	16.6%	381	1,900	49.8%	
Roseville	8,480	3,378	39.8%	5,102	54.2%	14.3%	732	4,110	48.5%	
Placer Uninc Tahoe Basin ¹	328	131	39.8%	197	57.5%	17.7%	35	166	50.5%	
Placer Uninc	4,704	1,874	39.8%	2,830	55.7%	15.9%	450	2,324	49.4%	
Placer County total	21,630	8,617	39.8%		53.5%			10,392		
Citrus Heights	696	277	39.8%	419	29.2%	-10.6%	-44	233	33.5%	
Elk Grove	7,404	2,950	39.8%	4,454	57.4%	17.5%	781	3,731	50.4%	
Folsom	4,634	1,846	39.8%	2,788	52.2%	12.4%	345	2,191	47.3%	
Galt	679	271	39.8%	408	22.1%	-17.8%	-73	198	29.1%	
Isleton	23	9	39.8%	14	19.4%	-20.5%	-3	6	27.5%	
Rancho Cordova	7,010	2,793	39.8%	4,217	33.7%	-6.2%	-260	2,533	36.1%	
Sacramento	24,108	9,604	39.8%	14,504	27.5%	-12.3%	-1,786	7,818	32.4%	
Sacramento Uninc	13,848	5,517	39.8%	8,331	37.1%	-2.8%	-231	5,285	38.2%	
Sacramento County total	58,402	23,266	39.8%		36.2%			21,996		
Live Oak	449	179	39.8%	270	38.3%	-1.5%	-4	175	38.9%	
Yuba City	2,680	1,068	39.8%	1,612	39.4%	-0.5%	-7	1,060	39.6%	
Sutter Uninc	335	134	39.8%	202	48.2%	8.4%	17	150	44.9%	
Sutter County total	3,464	1,380	39.8%		40.1%			1,385		
Davis	1,066	425	39.8%	641	39.3%	-0.5%	-3	422	39.5%	
West Sacramento	5,978	2,382	39.8%	3,597	34.0%	-5.9%	-211	2,170	36.3%	
Winters	320	127	39.8%	192	42.0%	2.2%	4	132	41.2%	
Woodland	1,878	748	39.8%	1,130	28.7%	-11.2%	-126	622	33.1%	
Yolo Uninc	1,891	753	39.8%	1,138	36.3%	-3.5%	-40	713	37.7%	
Yolo County total	11,133	4,435	39.8%		34.2%			4,059		
Marysville	72	29	39.8%	43	8.1%	-31.7%	-14	15	20.8%	
Wheatland	484	193	39.8%	291	35.9%	-4.0%	-12	181	37.5%	
Yuba Uninc	4,678	1,864	39.8%	2,814	34.5%	-5.3%	-149	1,714	36.6%	
Yuba County total	5,234	2,085	39.8%		34.3%			1,911		
SUM	105,000	41,830	39.8%	63,170	39.8%		0	41,830	39.8%	

Sacramento Area Council of Governments

1 - Tahoe Basin allocations based on projections provided by the Tahoe Regional Planning Agency

Table 6: Methodology F - Three Adjustment Factors and Base Affordable Allocation
DISCUSSION DRAFT FOR September 15, 2011 SACOG Board Meeting - action is NOT being taken on these allocations

RHMA Period : January 1, 2013 through October 31, 2021

Overall Allocation 2013-2021	Adjustment Factor A: INCOME										Adjustment Factor B: Jobs/Housing Balance										Adjustment Factor C: Proximity to Transit										A+B+C			VI-L		
	Base Affordable Allocation - VI-L (Col C* 39.838%)	% Households in VI +L (CHAS data)	Variance from 39.838%	Half of Variance (Col F* 50%)	Adjustment Factor* VI+V (Col G* Col D)	Jobs/Housing Ratio 2008-2035 Growth (SACOG data)	Variance from 1.2 Average (Col J - 1.2)	Half of Variance (Col K* 50%)	Adjustment Factor* VI+V (Col L* Col D)	% of 2008-2035 Growth within TPA Ave (Col O - (SACOG data)	Variance from 38% Ave (Col P - 38%)	Half of Variance (Col Q* 50%)	Adjustment Factor* VI+V (Col R* Col Q)	Factors A, B and C combined	Method F Adjust Factors	Method F Adjusted to match HCD Target = Very Low + Low Allocation	Method F match HCD Target = Very Low + Low Allocation	Method F match HCD Target = Very Low + Low Allocation	Method F match HCD Target = Very Low + Low Allocation																	
C	D	E	F	G	H	J	K	L	M	O	P	Q	R	T	U	V	W	X	Y																	
REGIONAL AVERAGES	372	46.5%	-6.7%	-3.4%	-5	0.7	-0.5	-25.0%	-37	0.0%	-38.0%	-19.0%	-28	-70	78	78	21.0%																			
Piacerville	372	46.5%	-6.7%	-3.4%	-5	0.7	-0.5	-25.0%	-37	0.0%	-38.0%	-19.0%	-28	-70	78	78	21.0%																			
South Lake Tahoe ¹	336	51.3%	-11.4%	-5.7%	-8	unknown	0.2	10.0%	0	unknown	0.0%	0.0%	0	-8	126	126	37.5%																			
El Dorado Uninc Tahoe Basin ¹	480	26.8%	13.1%	6.5%	12	unknown	1.4	10.0%	0	unknown	0.0%	0.0%	0	12	204	204	42.5%																			
El Dorado Uninc	5,949	26.8%	13.1%	6.5%	103	unknown	1.4	10.0%	157	unknown	0.0%	0.0%	-299	-39	1,534	1,534	39.0%																			
El Dorado County total	5,137	32.1%	13.1%	6.5%	103	1.4	10.0%	103	157	0.0%	-38.0%	-19.0%	-299	-39	1,534	1,534	39.0%																			
Auburn	308	37.6%	2.2%	1.1%	1	0.7	-0.5	-25.0%	-31	9.0%	-29.0%	-14.5%	-18	-47	76	76	24.7%																			
Colfax	51	52.5%	-12.6%	-6.3%	-1	3.7	2.5	125.0%	25	0.0%	-38.0%	-19.0%	-4	20	41	41	80.6%																			
Lincoln	3,791	33.7%	6.1%	3.1%	46	0.9	-0.3	-15.0%	-227	0.0%	-38.0%	-19.0%	-287	-467	1,043	1,046	27.6%																			
Loomis	154	32.1%	7.7%	3.9%	2	1.0	-0.2	-10.0%	-6	0.0%	-38.0%	-19.0%	-12	-15	46	46	29.9%																			
Rocklin	3,614	30.2%	9.6%	4.8%	73	1.4	0.2	10.0%	152	14.0%	-24.0%	-12.0%	-182	43	1,562	1,567	41.1%																			
Roseville	8,480	29.5%	10.3%	5.2%	175	1.6	0.4	20.0%	676	9.0%	-29.0%	-14.5%	-490	360	3,739	3,750	44.2%																			
Pleasanton	328	31.1%	8.7%	4.4%	6	unknown	1.0	-10.0%	0	unknown	0.0	0.0%	0	6	136	137	41.8%																			
Pleasanton Uninc	4,706	31.1%	8.7%	4.4%	82	1.0	-0.2	-10.0%	-187	0.0	-38.0%	-19.0%	-356	-462	1,412	1,416	30.1%																			
Pleasanton County total	21,630	31.2%	8.7%	4.4%	82	1.0	-0.2	-10.0%	-187	0.0	-38.0%	-19.0%	-356	-462	1,412	1,416	30.1%																			
Citrus Heights	696	42.2%	-2.4%	-1.2%	-3	1.2	0.0	0.0%	0	64.0%	26.0%	13.0%	36	33	310	311	44.7%																			
Elk Grove	7,404	26.1%	13.7%	6.9%	203	1.1	-0.1	-5.0%	-147	0.0%	-38.0%	-19.0%	-560	-505	2,444	2,452	33.1%																			
Folsom	4,634	23.3%	16.5%	8.3%	153	1.3	0.1	5.0%	92	7.0%	-31.0%	-15.5%	-286	-41	1,805	1,810	38.1%																			
Galt	679	46.1%	-6.3%	-3.1%	-8	1.0	-0.2	-10.0%	-27	0.0%	-38.0%	-19.0%	-51	-87	184	184	27.1%																			
Isleton	23	54.7%	-14.8%	-7.4%	-11	0.5	-0.7	-35.0%	-3	0.0%	-38.0%	-19.0%	-2	-6	4	4	17.4%																			
Rancho Cordova	7,010	27.9%	4.7%	2.4%	-111	1.0	-0.2	-10.0%	-279	31.0%	-7.0%	-3.5%	-98	-488	2,304	2,311	33.0%																			
Sacramento	24,108	47.7%	-7.9%	-3.9%	-378	1.1	-0.1	-5.0%	-480	75.0%	37.0%	18.5%	1,777	919	10,523	10,555	43.8%																			
Sacramento Uninc	13,848	41.9%	-2.1%	-1.0%	-57	1.3	0.1	5.0%	276	57.0%	19.0%	9.5%	524	743	6,260	6,279	45.3%																			
Sacramento County total	58,402	42.0%	-2.1%	-1.0%	-203	1.3	0.1	5.0%	276	57.0%	19.0%	9.5%	524	743	6,260	6,279	45.3%																			
Live Oak	449	39.1%	0.7%	0.3%	1	0.6	-0.6	-30.0%	-54	0.0%	-38.0%	-19.0%	-34	-87	92	92	20.5%																			
Yuba City	2,680	39.3%	0.5%	0.3%	3	1.3	0.1	5.0%	53	0.0%	-38.0%	-19.0%	-203	-147	921	924	34.5%																			
Sutter Uninc	335	30.2%	9.3%	4.6%	6	0.6	-0.6	-30.0%	-40	0.0%	-38.0%	-19.0%	-25	-59	74	75	22.4%																			
Sutter County total	3,464	37.5%	9.3%	4.6%	10	0.6	-0.6	-30.0%	-40	0.0%	-38.0%	-19.0%	-25	-59	74	75	22.4%																			
Davis	1,066	37.5%	2.3%	1.2%	5	1.1	-0.1	-5.0%	-21	80.0%	42.0%	21.0%	89	73	498	499	46.6%																			
West Sacramento	5,978	45.6%	-5.8%	-2.9%	-69	1.2	0.0	0.0%	0	82.0%	44.0%	22.0%	524	455	2,837	2,845	47.6%																			
Winters	320	34.3%	5.5%	2.8%	4	1.1	-0.1	-5.0%	-6	0.0%	-38.0%	-19.0%	-24	-27	100	101	31.6%																			
Woodland	1,878	44.4%	-4.8%	-2.3%	-17	1.4	0.2	10.0%	75	0.0%	-38.0%	-19.0%	-142	-84	664	665	35.4%																			
Yolo Uninc	1,891	41.9%	-2.0%	-1.0%	-8	1.9	0.7	35.0%	264	77.0%	39.0%	19.5%	147	403	1,156	1,160	61.3%																			
Yolo County total	11,133	41.7%	-2.0%	-1.0%	-8	1.9	0.7	35.0%	264	77.0%	39.0%	19.5%	147	403	1,156	1,160	61.3%																			
Marysville	72	45.2%	-5.3%	-2.7%	-1	2.2	1.0	50.0%	14	0.0%	-38.0%	-19.0%	-5	8	37	37	51.4%																			
Wheatland	484	40.9%	-1.1%	-0.5%	-1	0.8	-0.4	-20.0%	-39	0.0%	-38.0%	-19.0%	-37	-76	117	117	24.2%																			
Yuba Uninc	4,078	43.9%	-4.1%	-2.0%	-38	1.1	-0.1	-5.0%	-99	0.0%	-38.0%	-19.0%	-354	-485	1,379	1,383	29.6%																			
Yuba County total	5,234	44.0%	-4.1%	-2.0%	-40	1.1	-0.1	-5.0%	-99	0.0%	-38.0%	-19.0%	-354	-485	1,379	1,383	29.6%																			
Overall Allocation 2013-2021	105,000				169				107	38%			-401		41,705	41,830	39.8%																			