Research Report

Commissioned by the Rural Alliance, Inc.

Are Member Counties of the Rural County Representatives of California (RCRC) Receiving Their "Fair" Share of California State Programs Devoted to the Promotion of Affordable Housing?

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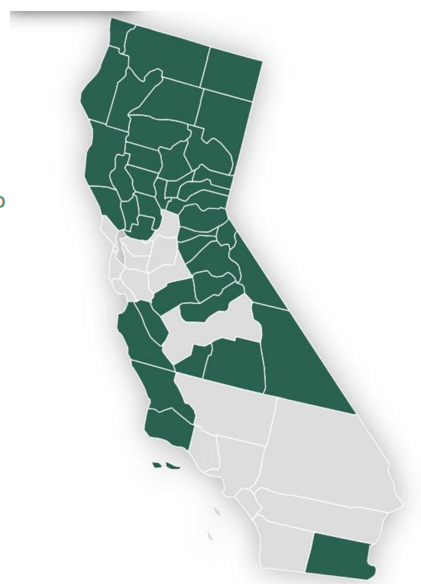
Background

The Rural Alliance, Inc. (RAI) of California is the education arm of a forty-county coalition of Rural County Representatives of California (RCRC) that examines and advocates for policies for California's more rural counties, including land use, water and natural resources, housing, transportation, wildfire protection policies, and health and human services. The core of RCRC's mission is to improve the ability of small, rural California county government to provide services and promote a greater understanding among policymakers about the unique challenges that California's small-population counties face. We list its 40-member counties below.

Alpine
Amador
Butte
Calaveras
Colusa
Del Norte
El Dorado
Glenn
Humboldt
Imperial
Inyo
Kings
Lake
Lassen
Madera
Mariposa
Mendocino
Merced
Modoc
Mono
Monterey
Napa
Nevada
Placer
Plumas
San Benito
San Luis Obispo
Santa Barbara
Shasta
Sierra
Siskiyou
Solano
Sonoma
Sutter
Tehama
Trinity
Tulare
Tuolumne
Yolo
Yuba



RCRC Counties

Of current interest to California's rural counties is the issue of the generation of more affordable housing. Below, we offer a partial summary of the RCRC's position on this policy issue.

> *California's rural communities have vast responsibilities concerning local land use planning, development, conservation, and general decision-making authority. While the State delegates most local land use and development decisions to cities and counties, state and local laws define the process for making planning decisions and require various planning elements to be prepared and included in a county-adopted General Plan. The General Plan is a comprehensive plan that outlines the county's goals and policies for accommodating future population growth and other physical demands. …The Department of Housing and Community Development, Division of Housing Policy Development, administers state housing element law, including the review of local housing elements. Housing element law mandates that local governments adequately plan to meet the existing and projected housing needs of all economic segments of the community as determined by the Regional Housing Needs Assessment (RHNA). …California is experiencing a well-documented housing shortage, particularly affordable units in high-market areas of the state.* (RCRC, Land Use, and Housing)

Summer 2023 Investigation

The RAI commissioned us in July 2023 to investigate the following research question.

> *Do rural communities receive a disproportionately small share, based on their size and need, of housing programs provided by the State of California, and if so, how can we determine the specific barriers to rural communities receiving their fair share of these funds?*

The motivation to ask such a question arose from anecdotes and facts like the February 2023 release of $825M of California's affordable housing funds in which less than four percent of these funds went to California counties under 250,000 population (~6.25% of California's total population) and none at all to the 26 least populated counties (Office of Governor Newsom, Press Release).

Next, we describe the data and methods to answer the assigned research question. The third section offers our findings regarding whether California's RCRC member counties, on average, receive a disproportionately small share of 13 California affordable housing programs. And even if this on average statement does not hold, what counties receive a disproportionately small percentage of offerings in a specific California housing affordability program? Finally, we provide some ideas on how to qualitatively investigate whether there are particular barriers to rural counties receiving their fair share of this statewide effort to increase housing affordability.

Data and Methods

Given our limited timeline and budget, to quantitatively investigate whether a California county is receiving its "fair" share (allocation) of affordable housing activity from a state-sponsored activity program meant to generate more affordable housing in the state, we only work with publicly available data. A description of this data follows, and then we summarize the methods employed in our analyses.

Data

We use existing and publicly available data sources to generate the spreadsheets necessary to allow the Rural Alliance Inc. and its members, policymakers, and the public access to the information needed to answer the first part of the research question asked of us. To start, we need data to determine what a "fair" share is and data that accounts for most of the state-funded programs meant to encourage the construction of more affordable housing throughout the state.

Calculating a "fair" share allocation for a county of the total activity in a state housing affordability program:

Two things came to our minds in determining the factors critical to determining "fair" share. The first is the size of the county relative to the state of California. The second is the county's housing affordability "needs" relative to the state of California.

We use two measures to account for size - total population and the number of individuals living below the poverty line. What it costs to rent or own shelter in a county, relative to what resources its residents have available to do this, are the two appropriate ways we chose to approximate a county's need for a lack of affordable housing.

As more fully described in a separate data dictionary and table, we use county and state population estimates from January 2023 and the estimated number of individuals living below the federal poverty line for 2022. What it costs on average to rent a one-bedroom apartment in each county, and all of California is embedded in California's 2023 Statewide Housing Plan and based upon the information in the 2021 Out of Reach report by the National Low Income Coalition. For median owner-occupied home prices, we utilize the National Association of Realtors values recorded for the first quarter of 2023. Per-capita income comes from 2021, adjusted to 2022 values using a statewide CPI inflator.

Statewide programs meant to encourage greater housing affordability, whose allocation values are available by county:

Two California agencies distribute most of the state's activities to encourage greater affordable housing. The first is the California Tax Credit Allocation Committee (CTCAC), which administers nine and four percent low-income housing tax credit programs to encourage the generation of greater private and affordable rental housing. The nine or four percent distinction indicates the fraction of a project's "qualified" basis that goes to a private developer in the form of annual federal tax credits. The Federal and California State governments restrict the annual amounts available under the nine and four percent forms. Thus, there is a competitive process that determines the receiving of each. More detail on these programs is available in the data dictionary.

CTCAC accounts for nine and four percent of low-income housing tax credit projects by calendar year and the county that receives them. We chose to report on (1) the number of affordable housing projects, (2) affordable housing units, and (3) low-income affordable units that receive the nine or the four percent tax credit. Thus, we have six different measures of housing affordability programs available from the CTCAC.

The California Department of Housing and Community Development (HCD) is the second data source on state-administered housing affordability programs. HCD promotes the construction of affordable homes and vibrant, inclusive, sustainable communities for all Californians by administering housing finance programs, developing housing policies, and advocating for an adequate housing supply. They report upon affordable housing funding streams broken down into different categories and separated by fiscal year and the county of allocation for housing assistance. More details on HCD programs are in a separate data dictionary and table.

The seven different measures of affordable housing allocations administered by HCD included in this analysis are (1) number of awards, (2) real dollar value of awards, (3) number of assisted units, (4) new housing units, (5) rehabilitated housing units, (6) number beneficiaries all programs, and (7) real dollar value leveraged units.

Over the legitimate concern that only looking at a single-year allocation of a state-administered housing affordability program may capture annual outliers, we aggregate values over the three most recent years available. CTCAC measures included annual calendar-year values from 2020, 2021, and 2022. HCD measures are only by fiscal year, including 2019/20, 2020/21, and 2021/22.

Methods

We employ three separate techniques in our analysis that require explanations before describing our findings. They are each described next.

Determination of a "fair" share percentage for a county of a California-based housing affordability program:

The following table is an excerpt from the separate RAI_Housing_Affordability_Data_Comparison.xlsx spreadsheet that illustrates the method used to calculate the "fair" share determination for a California county.

1	2	3	4	5	6	7	8
	"Fair" Share						
State and CA County	**Individuals Below Poverty Line 2021**	**SCALE FACTOR: CountyPoverty /StatePoverty**	**NAR Median Home Price Q1 2023**	**Per Capita Income 2021 (22$)**	**Median Home Price / Per Capita Income**	**EQUITY FACTOR: Median Home Price / Median Per Capita Income Ratio County to State**	**Fraction of Housing Assistance Appropriate: SCALE FACTOR *EQUITY FACTOR**
California	4733036	1.0000	836110	44289	18.88	1.00	**1.000000**
Monterey	51288	0.0108	836922	36252	23.09	1.22	**0.013251**
Tulare	91866	0.0194	356334	25437	14.01	0.74	**0.014403**
Los Angeles	1366544	0.2887	890716	40692	21.89	1.16	**0.334767**
Sacramento	205590	0.0434	550422	38791	14.19	0.75	**0.032648**

Table 1: "Fair" Share Calculation
(Excerpt from RAI_Housing_Affordability_Data_Comparison.xlsx)

Table 1 uses individuals in poverty as the scale factor and median home price (divided by per capita income) as the equity factor used to calculate the decimal percentage of appropriate housing assistance. Note that we calculated these also for the scale measurement of the total population and the equity numerator of one-bedroom apartment market rent. We include Monterey and Tulare in Table 1 as examples of RCRC counties and Los Angeles and Sacramento as examples of non-RCRC counties. In our comprehensive research, we derived appropriate assistance decimal measures for all California counties using poverty/home price and other possible combinations of poverty/rent, population/home price, and population/rent as scale and equity factors.

In column three in Table 1, the scale factor is county poverty divided by state poverty. The equity factor in column seven equals the county's affordability divided by the statewide affordability (column six). With these scale and equity decimal factors, the appropriate "fair" share decimal percentage that we expect the county to receive equals the value derived in column 8 from multiplying them. Note the one-third determination that we expect Los Angeles to accept a statewide housing affordability program compared to the less than one-and-a-half percent expected for each RCRC county. This distinction occurs because of the large-scale difference in Los Angeles and the lack of relative affordability in California's largest county.

<u>Calculation of an actual percentage share for a county of a California-based housing affordability program in comparison to its "fair" share:</u>

Available upon request are the four spreadsheets that each calculated and used one of the appropriate "fair" share fractions based on the possible combinations of scale and equity measures just described. The spreadsheets also contained data on the total amount of housing affordability activity for each of the 13 measures discussed earlier for all of California over the previous three calendar or fiscal years. Having this, we can calculate the decimal percentage of a housing affordability program measure going to a county and then weigh it against the scale and equity created decimal portion expected as "fair." The result is the ratio of the actual decimal percentage of the statewide program received to a desired "fair" decimal part. They yielded values more significant than one if receiving a fraction of the program greater than the various forms of "fair" share fractions used.

Table 2 compares actual activity to expected "fair" share activity for two different CTCAC and three different HCD programs. As an example, look to column two and note that Monterey and Sacramento Counties are receiving close to the expected ratio of actual to appropriate nine percent tax credit projects (1.04 and 1.06, respectively), while Tulare County is receiving nearly twice as much (1.92) and Los Angeles county less than half as much (0.46).

1	2	3	4	5	6	7
	DEBT ALLOCATION			HOUSING & COMM DEV		
State and CA County	**2020 to 2022 Number 9% Tax Credit Projects Ratio Actual to Appropriate**	**2020 to 2022 Number Total 4% Units Tax Credit Ratio Actual to Appropriate**		**2019 to 2022 Total # HCD Awards Ratio Actual to Appropriate**	**2019 to 2022 Total (22$) Real HCD Awards Ratio Actual to Appropriate**	**2019 to 2022 Total # Assisted Units Ratio Actual to Appropriate**
California	1.00	1.00		1.00	1.00	1.00
Monterey	1.04	0.75		1.63	0.99	2.24
Tulare	1.92	0.54		2.96	1.37	1.50
Los Angeles	0.47	0.77		0.41	0.78	1.11
Sacramento	1.06	2.38		0.71	0.99	1.55

Table 2: Ratio of Actual to "Fair Share" Calculation
(Excerpt from RAI_Housing_Affordability_Data_Comparison.xlsx)

Assessment of whether the average ratios of actual to "fair" share for a California-based housing affordability program is different when comparing all RCRC counties to non-RCRC counties:

We used the STATA statistical program to calculate the mean values of the ratios like those offered in Table 2 for the 40 California RCRC counties and for the 18 non-RCRC counties across all 13 different housing affordability measures and for all four different ways of using poverty, population, one-bedroom rent, and median home price to calculate a fair-share. As noted in the RAI_Housing_Affordability_Data_Comparison spreadsheet (column AN), the US Department of Agriculture classified all counties as "metropolitan" or "nonmetropolitan" in 2015. We thought it also appropriate to consider only comparing metropolitan-classified RCRC and non-RCRC counties (all non-RCR counties are metropolitan) and do this also. In addition, we compare counties only by population with chosen divisions of less than or greater than 50K, 200K, and 250K. The appropriate statistical test employed to do this in STATA is a t-test (comparison of means).

Findings

Next, we describe our findings regarding how California's RCRC member counties have done over the last three years regarding "fair-share" distributions of 13 different housing affordability program outcomes. In summary, we have found that for the four-percent tax credit program, RCRC counties, on average, are not receiving their fair-share allocation of this program. In addition, we have importantly found that many RCRC counties are not participating in specific housing affordability programs or participating at a level that yields less than a "fair share" receipt of a program for them. Details on these findings are below. And importantly, we describe how to identify the RCRC counties receiving a disproportionately small share of offerings in a specific California housing affordability program so the RAI could consider ways to assist them appropriately.

Do RCRC Counties Receive a "Fair" Share of Housing Affordability Programs?

As described above, we extensively compared means t-tests to check if the average values recorded for RCRC counties (and other variations) differed with a 90 percent degree of statistical confidence than the non-RCRC group. The RAI_Housing_Affordability_Means_Comparison.xlsx spreadsheet contains the results of all these tests. Note the tabs on this file that indicate tests performed for an all RCRC and non-RCRC comparison (and for only metropolitan counties) using the four ways of determining a "fair" share and the three population divisions using the poverty and home price-based indexes described earlier. A primary takeaway is that the results of these comparisons do not essentially change if using any of the four different iterations on how to calculate the fair share.

To ease the interpretation of these results, we color code each spreadsheet in green (red) for results that support (reject) the idea that, on average, RCRC counties (or smaller population counties) receive less than their fair share of affordable housing allocations. A tally across the six spreadsheets in RAI_Housing_Affordability_Means_Comparison.xlsx indicates that there are far more findings indicating that RCRC or small population counties, on average, are more likely to be receiving more than their calculated "fair" share of housing affordability activity.

Median Home Price/Below Poverty Line - Allocated Need				
*The means recorded below are the ratios of the actual amount of stated housing affordability given / amount that could be considered "fair" total offered in California * (fraction for scale * fraction for need). Fraction for scale = county's number poor / state's number poor). Fraction for need = (county's median home price / county's per-capita income) / (state's median home price / state's per=capita income). Other measures of scale (population) and need (fair market annual rent for one-bed apt / per=capita income) were also used and respective results are below.*				
		FINDING RELEVANT TO RCRC COUNTIES RECEIVING LESS		
4% Tax Credit Low-Income Units	ALL	0.8 Index for <200K -- 1.6 Index for > 200K	0.8 Index for <250K -- 1.7 Index for > 250K	0.9 Index for RCRC-- 1.7 Index for non-RCRC
	METRO	0.5 Index for <200K -- 1.6 Index for > 200K	0.4 Index for <250K -- 1.7 Index for > 250K	1.0 Index for RCRC --1.7 Index for non-RCRC
4% Tax Credit Projects	ALL			
	METRO	0.9 Index for <250K -- 1.4 Index for >250K		
4% Tax Credit Total Units	ALL	0.8 Index for <200K -- 1.4 Index for > 200K	0.8 Index for <250K -- 1.5 Index for > 250K	
	METRO	0.5 Index for <200K -- 1.4 Index for > 200K	0.4Index for <250K -- 1.5 Index for > 250K	

Table 3: Where RCRC Counties On Average Receive Less than "Fair" Share (Excerpt from RAI_Housing_Affordability_Means_Comparison.xlsx)

Table 3 highlights the findings where RCRC counties have received less than non-RCRC counties in the average allocation of housing affordability programs measured as actual to fair. Note that we found this only occurring for the four percent tax credit program, no matter how measured – but especially if measured for low-income units. For example, consider that the calculated average low-income unit index for actual received/fair received is less than one (0.9) for all RCRC counties and nearly two (1.7) for all non-RCRC counties.

Thus, an area ripe for investigation is our determination of the underrepresentation of RCRC counties on average in receiving their "fair" share of four percent tax credits when we also find that these same counties are receiving their fair share or more of the other California housing affordability programs accounted for here.

RCRC Counties Receiving Less than a "Fair" Share of a Housing Affordability Program

We have found, on average, that RCRC counties have received more than their "fair" share of affordable housing assistance as we have defined this term. The only exception is with the four percent tax credit program. But remember, this statement is based on averages. Our research has also uncovered that some RCRC counties receive less than their "fair" share in a housing affordability program and sometimes across multiple programs. We prepared the spreadsheet RAI_Housing_Affordability_Data_Comparison.xlsx so RCRC county representatives, the agencies offering these incentives, and policymakers can quickly determine where this is the case. Reproduced below in Table 4 are the first eight columns of this spreadsheet. The rows highlighted in green represent RCRC counties.

Column three in Table 4 contains the number of the 13 housing affordability programs in which a county has had no support for the last three years. Recorded in column four is the number of these 13 programs with activity but with an appropriate ratio (actual activity to "fair" share activity) of less than one. Columns four through nine contain the proper proportions for each respective housing program, with the highest RCRC county value bolded in green in a column and the highest non-RCRC county value bolded in red. For instance, RCRC member Butte County exhibits no housing programs with zero participation and only five with less than an appropriate ratio of less than one. Its correct ratio for nine percent tax credit units is nearly 20 times greater than expected. At the same time, the highest non-RCRC Santa Clara County exhibits no housing programs with zero participation and none with less than an appropriate ratio of less than one. Its proper ratio for nine percent tax credit units is nearly four times greater than expected.

Table 5 continues the reporting by county like in Table 4, but this time for the remaining seven HCD-offered housing affordability programs reported upon in columns two through eight. Here, you see the high values for ratios of the number of HCD awards actual program activity received to that deemed appropriate based upon scale and need occurring to the RCRC county of Mono at 225 times greater HCD awards. While among non-RCRC counties in the specific HCD category, Santa Cruz County leads at a much smaller ratio of close to five (4.53)

1	2		3	3		4	5	6	7	8	9
	RURAL STATUS					DEBT ALLOCATION					
					RCRC COUNTY Avg	2.63*	2.64*	2.98*	0.94*	1.28	0.95
					Non_RCRC COUNTY Avg	0.98	0.96	1.10	1.65	1.23	1.37
State and CA County	Member of Rural Alliance (Yes=1)		Number out of 13 possible Housing Affordability Program Measures with Zero Activity	Number out of 13 poosible Housing Affordability Program Measures with Some Activity but Below Expected Based on Size and Need		2020 to 2022 Number 9% Tax Credit Projects Ratio Actual to Appropriate	2020 to 2022 Number Total 9% Units Tax Credit Ratio Actual to Appropriate	2020 to 2022 Number Low Income Units 9% Tax Credit Ratio Actual to Appropriate	2020 to 2022 Number 4% Tax Credit Projects Ratio Actual to Appropriate	2020 to 202 Number Total 4% Units Tax Credit Ratio Actual to Appropriate	2020 to 2022 Number Low Income Units 4% Tax Credit Ratio Actual to Appropriate
California	.					1.00	1.00	1.00	1.00	1.00	1.00
Alpine	1		10	0		0.00	0.00	0.00	0.00	0.00	0.00
Amador	1		7	0		0.00	0.00	0.00	0.00	0.00	0.00
Butte	1		0	5		18.39	19.46	19.71	0.92	0.61	0.61
Calaveras	1		7	0		0.00	0.00	0.00	0.00	0.00	0.00
Colusa	1		3	2		0.00	0.00	0.00	6.00	2.89	2.88
Del Norte	1		6	1		0.00	0.00	0.00	0.00	0.00	0.00
El Dorado	1		5	2		0.00	0.00	0.00	0.90	0.01	0.00
Glenn	1		1	0		6.19	4.58	4.61	12.10	11.46	11.13
Humboldt	1		3	0		2.54	1.30	1.30	0.00	0.00	0.00
Imperial	1		0	4		0.55	0.50	0.50	2.14	1.38	1.39
Inyo	1		10	0		0.00	0.00	0.00	0.00	0.00	0.00
Kings	1		3	4		0.00	0.00	0.00	0.58	0.41	0.41
Lake	1		0	0		10.85	12.23	12.40	1.77	1.25	1.25
Lassen	1		7	1		8.69	6.82	6.87	0.00	0.00	0.00
Madera	1		0	10		1.91	0.82	0.82	0.83	0.41	0.41
Mariposa	1		4	0		13.03	8.26	8.28	0.00	0.00	0.00
Mendocino	1		0	2		4.35	3.54	3.57	1.89	1.16	1.16
Merced	1		0	7		0.36	0.24	0.24	0.23	0.27	0.27
Modoc	1		10	1		0.00	0.00	0.00	0.00	0.00	0.00
Mono	1		6	0		0.00	0.00	0.00	0.00	0.00	0.00
Monterey	1		0	5		1.04	1.00	1.02	0.68	0.75	0.75
Napa	1		3	0		7.18	11.38	11.52	0.00	0.00	0.00
Nevada	1		0	0		1.99	2.04	2.07	3.90	1.94	1.93
Placer	1		3	3		0.00	0.00	0.00	3.07	3.73	3.74
Plumas	1		10	0		0.00	0.00	0.00	0.00	0.00	0.00
San Benito	1		9	3		0.00	0.00	0.00	0.00	0.00	0.00
San Luis Obispo	1		0	7		2.90	1.75	1.76	1.26	0.71	0.71
Santa Barbara	1		0	4		1.63	1.77	1.78	0.89	0.95	0.95
Shasta	1		1	3		6.89	4.63	4.64	0.75	0.57	0.58
Sierra	1		10	1		0.00	0.00	0.00	0.00	0.00	0.00
Siskiyou	1		4	0		4.87	3.68	3.70	0.00	0.00	0.00
Solano	1		1	8		0.52	0.57	0.58	2.72	2.56	2.57
Sonoma	1		0	1		7.29	7.55	7.00	4.16	4.01	3.93
Sutter	1		3	3		0.00	0.00	0.00	1.25	0.39	0.40
Tehama	1		1	2		2.71	1.31	1.30	1.77	0.83	0.83
Trinity	1		10	1		0.00	0.00	0.00	0.00	0.00	0.00
Tulare	1		0	4		1.92	1.81	1.82	0.78	0.54	0.54
Tuolumne	1		3	0		6.00	3.08	3.07	0.00	0.00	0.00
Yolo	1		1	8		0.56	0.41	0.41	0.37	0.14	0.14
Yuba	1		0	3		6.87	6.63	6.71	2.24	0.88	0.88
Alameda	0		0	4		0.56	0.50	0.51	1.76	1.67	1.67
Contra Costa	0		1	6		0.64	0.41	0.42	2.24	3.26	3.26
Fresno	0		0	5		2.03	1.73	1.74	0.28	0.30	0.30
Kern	0		0	9		3.15	0.77	0.78	0.80	0.47	0.46
Los Angeles	0		0	10		0.47	0.44	0.43	0.85	0.77	0.81
Marin	0		0	7		0.99	1.00	1.02	1.29	0.85	0.85
Orange	0		0	12		0.52	0.54	0.55	0.37	0.50	0.50
Riverside	0		0	12		0.68	0.77	0.78	0.92	0.91	0.92
Sacramento	0		0	4		1.06	1.04	1.05	2.48	2.38	7.25
San Bernardino	0		0	13		0.11	0.08	0.09	0.11	0.14	0.14
San Diego	0		1	7		0.83	0.84	0.85	1.14	1.17	1.16
San Francisco	0		0	3		0.99	1.38	0.98	2.07	2.55	2.57
San Joaquin	0		0	12		0.36	0.24	0.24	0.35	0.35	0.35
San Mateo	0		0	1		1.88	1.84	1.85	2.25	2.47	2.45
Santa Clara	0		0	5		0.56	0.67	0.68	2.49	3.30	3.31
Santa Cruz	0		0	4		3.59	3.87	3.92	0.33	0.22	0.22
Stanislaus	0		0	13		0.27	0.28	0.29	0.52	0.68	0.69
Ventura	0		0	1		1.08	1.19	1.20	1.96	2.70	2.71

Table 4: Where California Counties Stand Concerning all Housing Affordability Programs and Debt Allocation in Particular
(extracted from RAI_Housing_Affordability_Data_Comparison.xlsx)

1		2	3	4	5	6	7	8
		HOUSING AND COMMUNITY DEV						
	RCRC COUNTY Avg	19.02*	3.20	3.56	3.70*	3.39	14.17*	1.96
	Non_RCRC COUNTY Avg	1.30	1.30	1.67	1.72	1.58	0.78	1.38
State and CA County		**2019 to 2022 Total # HCD Awards Ratio Actual to Appropriate**	**2019 to 2022 Total (22$) Real HCD Awards Ratio Actual to Appropriate**	**2019 to 2022 Total # Assisted Units Ratio Actual to Appropriate**	**2019 to 2022 Total # New Housing Units Ratio Actual to Appropriate**	**2019 to 2022 Total # Rehab Housing Units Ratio Actual to Appropriate**	**2019 to 2022 Total # Other Activities (Beneficiaries from all Programs) Ratio Actual**	**2019 to 2022 Other (22$) Real Funds Leveraged Ratio Actual to Appropriate**
California		1.00	1.00	1.00	1.00	1.00	1.00	1.00
Alpine		**225.32**	5.88	0.00	0.00	0.00	18.61	0.00
Amador		22.91	5.10	5.01	4.85	0.00	32.06	3.27
Butte		4.21	0.82	2.02	2.15	1.28	11.02	0.30
Calaveras		11.09	1.58	5.21	5.05	0.00	21.21	2.37
Colusa		8.42	2.55	4.91	5.04	2.98	0.51	0.49
Del Norte		22.52	2.01	1.31	1.27	4.35	37.10	0.02
El Dorado		7.12	5.09	6.70	6.48	0.00	2.39	3.04
Glenn		26.43	7.29	8.35	8.15	0.00	42.51	1.14
Humboldt		5.55	1.83	2.19	2.49	9.04	6.77	1.48
Imperial		3.84	2.26	3.43	3.57	0.25	6.29	1.46
Inyo		22.47	1.45	0.00	0.00	0.00	11.11	0.00
Kings		4.47	1.25	1.08	1.26	3.80	0.33	1.32
Lake		10.33	2.28	3.69	3.66	10.71	2.15	2.41
Lassen		13.25	0.46	0.00	0.00	0.00	11.87	0.00
Madera		2.14	0.65	0.94	0.99	0.25	2.80	0.34
Mariposa		33.78	2.69	10.21	14.14	2.53	**53.07**	0.00
Mendocino		12.60	2.39	1.70	1.99	0.84	36.17	0.75
Merced		1.90	1.14	1.51	1.65	2.65	2.31	0.85
Modoc		17.36	0.53	0.00	0.00	0.00	43.40	0.00
Mono		58.67	**40.81**	**38.11**	**37.55**	**31.47**	7.82	**32.83**
Monterey		1.63	0.99	2.24	2.17	2.46	2.34	0.99
Napa		11.50	4.50	5.94	7.24	16.97	7.35	4.47
Nevada		11.54	3.25	3.21	3.92	11.09	21.09	1.24
Placer		4.19	1.28	0.29	0.80	4.22	4.99	0.06
Plumas		24.10	1.10	0.00	0.00	0.00	5.56	0.00
San Benito		5.22	0.85	0.00	0.52	0.00	0.91	0.00
San Luis Obispo		2.29	0.67	0.51	0.65	0.19	2.08	0.47
Santa Barbara		1.66	1.24	2.14	2.07	2.61	1.05	0.88
Shasta		6.30	1.82	2.88	2.64	0.00	12.47	2.33
Sierra		100.90	2.43	0.00	0.00	0.00	0.38	0.00
Siskiyou		23.04	4.35	2.65	2.57	0.00	38.29	1.77
Solano		2.31	0.63	0.61	0.93	0.14	0.33	0.00
Sonoma		2.57	4.81	5.59	5.74	3.01	0.61	3.84
Sutter		4.99	2.56	4.52	4.44	0.62	3.46	2.80
Tehama		8.26	1.29	3.01	2.91	0.00	47.27	2.62
Trinity		11.70	0.50	0.00	0.00	0.00	32.59	0.00
Tulare		2.96	1.37	1.50	1.58	3.33	4.38	0.91
Tuolumne		11.90	1.97	6.33	4.87	17.10	11.67	2.52
Yolo		2.41	1.77	1.45	1.89	0.00	0.46	0.75
Yuba		6.80	2.56	2.93	2.84	3.78	19.84	0.80
Alameda		1.72	3.18	4.01	4.44	1.20	0.08	4.03
Contra Costa		1.34	0.85	1.40	1.40	0.00	0.67	0.89
Fresno		1.38	0.80	1.40	1.44	2.25	2.79	0.85
Kern		0.96	0.63	0.98	1.12	1.62	2.02	0.27
Los Angeles		0.41	0.78	1.11	1.12	1.00	0.16	0.90
Marin		3.94	1.31	0.44	0.43	**4.18**	0.89	0.83
Orange		0.49	0.32	0.49	0.53	1.48	0.07	0.18
Riverside		0.55	0.52	0.91	0.95	1.32	0.23	0.62
Sacramento		0.71	0.99	1.55	1.75	4.06	0.05	1.00
San Bernardino		0.31	0.22	0.22	0.21	0.56	0.02	0.03
San Diego		0.35	0.53	1.24	1.31	0.00	0.10	0.83
San Francisco		1.18	**4.42**	4.00	4.14	3.80	0.00	**4.71**
San Joaquin		0.74	0.77	0.92	0.89	0.93	1.38	0.77
San Mateo		1.86	2.34	3.20	3.11	1.93	0.58	1.68
Santa Clara		0.84	1.70	1.45	1.51	1.48	0.04	1.83
Santa Cruz		**4.53**	2.42	**4.86**	**4.70**	0.66	**4.42**	4.33
Stanislaus		0.86	0.45	0.14	0.20	0.42	0.36	0.01
Ventura		1.28	1.15	1.73	1.68	1.62	0.25	1.17

Table 5: Tally of Where California Counties Stand concerning only HCD Programs (extracted from RAI_Housing_Affordability_Data_Comparison.xlsx)

Rural Counties Not Getting a "Fair" Share of Statewide Housing Affordability Programs

Earlier in this report, we documented that California's RCRC Counties are, on average, receiving less than their calculated "fair" share of the statewide four percent tax credit program over the last three years. Table 3 shows this is especially acute when only examining "metropolitan"-classified counties and dividing all counties not by RCRC status but by those with less and greater than 250K population –. In contrast, only Santa Cruz and Marin Counties have the lower population cutoff and are RCRC members. In this case, the average ratio of four percent tax credit units awarded to a "fair" share is 0.4 for the less populated and 1.7 for the more populated.

In our minds, the above findings point to structural issues that could arise on either the supply or demand side of the processes in place to receive a four percent tax credit award to develop affordable housing in a small California county privately. By the supply side, we refer to the application or decision process that may produce a bias against small population counties receiving this state-allocated award. But there is also the possibility that factors on the demand side could also exert a similar tamping down of awards to small population counties. This could include private developers of affordable housing projects being less interested in the necessarily smaller-scale projects in these counties and jurisdictions in these counties not having the administrative, fiscal, or existing institutional resources to assist a developer in putting together an application as a larger-scale county has.

Thus, we suggest a further qualitative investigation that would yield a better understanding of the supply and demand processes and the biases against the award of this four percent tax credit housing affordability program that may exist toward small populations (more likely RCRC counties). Furthermore, an examination of the RAI_Housing_Affordability_Data_Comparison.xlsx spreadsheet reveals that the RCRC counties of Imperial, Nevada, and Lake are outliers regarding their receipt of four percent tax credit awards being more than their "fair" share. They, therefore, are candidates for an investigation of the reasons for their success and if they perceived any biases necessary to overcome to achieve it.

On average, RCRC counties (and small population counties) are getting their appropriate share or more of housing affordability programs in California (except for the four percent tax credit program just discussed). But a closer examination of county-specific measures for the 13 different housing affordability programs covered in this analysis and reported upon in RAI_Housing_Affordability_Data_Comparison.xlsx spreadsheet shows that there are numerous RCRC counties whose actual share of programs for the last three years has been less than the calculated "fair" share.

Thus, we also suggest the need for a further qualitative investigation that identifies these low-end county receivers and a higher-end county receiver of similar characteristics and then seeks to understand the reasons for the difference. Again, this would primarily be qualitative. We have crafted the addition of relevant attributes of counties in the spreadsheet mentioned above. Look for a comparable comparison to a low-end county recipient as another county that best matches its population (column V), housing units (Y), land area (AA), metropolitan (AG), economic type (AI), rural-urban continuum (AJ), urban influence code (AM), rank as rural county (AN), and fraction square miles rural (AO).