



SOUTHERN CALIFORNIA  
ASSOCIATION OF GOVERNMENTS  
900 Wilshire Blvd., Ste. 1700  
Los Angeles, CA 90017  
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## SPECIAL MEETING

# REGIONAL HOUSING NEEDS ASSESSMENT (RHNA) SUBCOMMITTEE

*Monday, February 24, 2020  
10:00 a.m. – 12:00 p.m.*

**SCAG Main Office  
900 Wilshire Blvd., Ste. 1700  
RC Board Room  
Los Angeles, CA 90017  
(213) 236-1800**

**See Next Page for Other Meeting Locations and  
Webcasting information**

If members of the public wish to review the attachments or have any questions or comments on any of the agenda items related to RHNA, please send an email to [housing@scag.ca.gov](mailto:housing@scag.ca.gov). Agendas and Meeting Minutes are also available at: [www.scag.ca.gov/committees](http://www.scag.ca.gov/committees)

SCAG, in accordance with the Americans with Disabilities Act (ADA), will accommodate persons who require a modification of accommodation in order to participate in this meeting. SCAG is also committed to helping people with limited proficiency in the English language access the agency's essential public information and services. You can request such assistance by calling (213) 236-1908. We request at least 72 hours (three days) notice to provide reasonable accommodations and will make every effort to arrange for assistance as soon as possible.

## **2/21/20 ADDENDUM: SEE UPDATED WEBCAST INFORMATION BELOW**

### **Videoconference Sites & Addresses**

#### SCAG Los Angeles Office (Main Office)

900 Wilshire Blvd., Ste. 1700, Los Angeles, CA 90017

#### SCAG Imperial County Regional Office

1503 N. Imperial Ave., Ste. 104, El Centro, CA 92243

#### SCAG Orange County Regional Office

600 S. Main St., Orange, CA 92868

*\*Due to limited capacity, please RSVP prior to the meeting to ensure availability,  
[housing@scaq.ca.gov](mailto:housing@scaq.ca.gov)*

#### SCAG Riverside County Regional Office

3403 10<sup>th</sup> St., Ste. 805, Riverside, CA 92501

#### SCAG San Bernardino County Regional Office

1170 W. 3<sup>rd</sup> St., Ste. 140, San Bernardino, CA 92410

#### SCAG Ventura County Regional Office

4001 Mission Oaks Blvd., Ste. L, Camarillo, CA 93012

#### City of Palmdale Office

38250 Sierra Hwy., Palmdale, CA 93550

#### South Bay Cities Council of Governments Office

South Bay Environmental Services Center, 20285 S. Western Avenue, Suite 100 Torrance, CA 90501

### **Teleconference Sites & Addresses**

#### Simi Valley City Hall

2929 Tapo Canyon Road  
Simi Valley, 93063

**Webcasting Available** - Webcast participation is view-only.

**To join the meeting**, click on this link: ~~<https://scag.zoom.us/j/807124298>~~ <https://scag.zoom.us/j/918588357>

**To join by phone**, please dial 1-669-900-6833 and Enter Meeting ID: ~~807-124-298~~ **918 588 357**

## **RHNA SUBCOMMITTEE MEMBERS – RHNA 6<sup>TH</sup> CYCLE**

### **VOTING MEMBERS**

#### **Representing Imperial County**

Primary: Hon. Jim Predmore, Holtville  
Alternate: Hon. Bill Hodge, Calexico

#### **Representing Los Angeles County**

Primary: Hon. Margaret Finlay, Duarte  
Alternate: Hon. Rex Richardson, Long Beach

#### **Representing Orange County**

Primary: Hon. Wendy Bucknum, Mission Viejo  
Alternate: **CHAIR** Peggy Huang, Yorba Linda, TCA

#### **Representing Riverside County**

Primary: Hon. Rusty Bailey, Riverside  
Alternate: Hon. Russell Betts, Desert Hot Springs

#### **Representing San Bernardino County**

Primary: Hon. Bill Jahn, Big Bear Lake  
Alternate: Hon. Jim Mulvihill, San Bernardino

#### **Representing Ventura County**

Primary: Hon. Carmen Ramirez, Oxnard  
Alternate: Hon. Mike Judge, Simi Valley, VCTC

### **NON-VOTING/EX-OFFICIO MEMBERS**

#### **Representing Academia**

Ex-Officio: Paavo Monkkonen, Vice Chair, Dept. of Urban Planning, UCLA

#### **Representing Non-Profit/Advocate**

Ex-Officio: Cesar Covarrubias, Executive Director, Kennedy Commission

#### **Representing Building Industry**

Ex-Officio: Jeff Montejano, Chief Executive Officer, BIA of Southern California

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## RHNA SUBCOMMITTEE SPECIAL MEETING AGENDA

Southern California Association of Governments  
900 Wilshire Boulevard, Suite 1700  
Los Angeles, California 90017  
**Monday, February 24, 2020**  
**10:00 AM**

### **CALL TO ORDER AND PLEDGE OF ALLEGIANCE** *(The Honorable Peggy Huang, Chair)*

### **ROLL CALL**

### **PUBLIC COMMENT PERIOD**

Members of the public desiring to speak on items on the Special Meeting Agenda must fill out and present a Public Comment Card to the Assistant prior to speaking. Comments will be limited to three (3) minutes per speaker. The Chair has the discretion to reduce the time limit based upon the number of speakers and may limit the total time for all public comments to twenty (20) minutes.

### **REVIEW AND PRIORITIZE AGENDA ITEMS**

### **ACTION / DISCUSSION ITEMS**

1. Recommended Final RHNA Methodology Page 1  
*(Kome Ajise, Executive Director, SCAG)*

**Recommended Action:** Approve a recommendation that the Community, Economic and Human Development Committee (CEHD) recommend Regional Council (RC) approval of Resolution No. 20-619-2 Adopting the Final Regional Housing Needs Assessment (RHNA) Methodology for the Sixth Housing Element Cycle (2021- 2029).

2. 6<sup>th</sup> Cycle RHNA Appeals Procedures Page 65  
*(Kome Ajise, Executive Director, SCAG)*

**Recommended Action:** Recommend that the Community, Economic and Human Development (CEHD) Committee recommend Regional Council approval of the 6<sup>th</sup> Cycle RHNA Appeals Procedures.

### **CONSENT CALENDAR**

3. Minutes of the Meeting – October 7, 2019 Page 115



**Receive and File**

- 4. State HCD Review Findings of SCAG's Draft RHNA Methodology Page 124
- 5. Written Comments Received Page 126
- 6. 6<sup>th</sup> Cycle RHNA Development Timeline Page 139

**CHAIR'S REPORT**

*(The Honorable Peggy Huang, Chair)*

**STAFF REPORT**

**ANNOUNCEMENT/S**

**ADJOURNMENT**

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Southern California Association of Governments  
900 Wilshire Boulevard, Suite 1700, Los Angeles, California 90017  
**February 24, 2020**

**To:** Regional Housing Needs Assessment Subcommittee (RHNA)

**EXECUTIVE DIRECTOR'S  
APPROVAL**

**From:** Kome Ajise, Executive Director, Executive Management,  
213-236-1835, [Ajise@scag.ca.gov](mailto:Ajise@scag.ca.gov)

**Subject:** Recommended Final RHNA Methodology

**RECOMMENDED ACTION FOR RHNA SUBCOMMITTEE:**

Approve a recommendation that the Community, Economic and Human Development Committee (CEHD) recommend Regional Council (RC) approval of Resolution No. 20-619-2 Adopting the Final Regional Housing Needs Assessment (RHNA) Methodology for the Sixth Housing Element Cycle (2021- 2029).

**STRATEGIC PLAN:**

This item supports the following Strategic Plan Goal 1: Produce innovative solutions that improve the quality of life for Southern Californians.

**EXECUTIVE SUMMARY:**

*As part of the RHNA process, SCAG must develop a final RHNA methodology, which will determine each jurisdiction’s draft RHNA allocation as a share of the regional determination of 1,341,827 housing unit need as determined by the California Department of Housing and Community Development (HCD). Following the Regional Council approval of a draft RHNA methodology I and review finding by HCD that the methodology furthers the applicable statutory objectives, staff requests for the RHNA Subcommittee to approve a recommendation that CEHD recommend Regional Council approval of Resolution No. 20-619-2, which reflects adoption of the draft RHNA methodology as the final RHNA methodology.*

**BACKGROUND:**

As part of the RHNA process, SCAG must develop a final RHNA methodology, which will determine each jurisdiction’s draft RHNA allocation as a share of the regional determination of 1,341,827 housing unit need as determined by HCD.

Between August 1 and September 13, 2019, SCAG solicited public comments on three options for allocating the regional determination to the region’s 197 local jurisdictions. Based on feedback received, and after careful consideration of the statutory objectives of RHNA which guide the methodology process, the Regional Council voted on November 7, 2019 to approve a draft RHNA

**OUR MISSION**

*To foster innovative regional solutions that improve the lives of Southern Californians through inclusive collaboration, visionary planning, regional advocacy, information sharing, and promoting best practices.*

**OUR VISION**

*Southern California’s Catalyst for a Brighter Future*

**OUR CORE VALUES**

*Be Open | Lead by Example | Make an Impact | Be Courageous*

methodology. A detailed timeline of meetings, submissions, staff reports, and correspondences is attached.

Per Government Code 65584.04 et seq., HCD has 60 days to review the draft methodology and determine whether it furthers the statutory objectives of RHNA. If HCD finds that the draft methodology is not consistent with the five statutory objectives of RHNA, SCAG may make revisions to further the statutory objectives per HCD review comments. On January 13, 2020, HCD completed their statutory review and found that SCAG's Draft RHNA Methodology furthers the five statutory objectives of RHNA, which allows SCAG to finalize the RHNA methodology and issue draft RHNA allocations to each individual jurisdiction. HCD's comment letter (attached) notes:

*"HCD has completed its review of the methodology and finds that the draft SCAG RHNA methodology furthers the five statutory objectives of RHNA. HCD acknowledges the complex task of developing a methodology to allocate RHNA to 197 diverse jurisdictions while furthering the five statutory objectives of RHNA. This methodology generally distributes more RHNA, particularly lower income RHNA, near jobs, transit, and resources linked to long term improvements of life outcomes. In particular, HCD applauds the use of objective factors specifically linked the statutory objectives in the existing need methodology."*

HCD's analysis individually reviews the five statutory objectives of RHNA. Particular emphases are placed on data-based indicators of the extent to which SCAG's draft RHNA methodology (1) assigns more lower-income units to high-income/high-resourced jurisdictions, and (2) assigns lower-income units to jurisdictions with more low-wage jobs. HCD concludes its letter with an indication that *"any changes made in response to appeals should be in the interest of seeking ways to more deeply further the objectives without compromising other objectives."* HCD's findings confirm and complement SCAG's assessment of the methodology and illustrate how the distribution of units across the region advances statutory objectives (see attached PowerPoint).

Following HCD's findings of compliance, staff recommends that the Regional Council adopt the draft RHNA methodology as the final RHNA methodology by resolution. A detailed description of the staff-recommended final RHNA methodology is attached. Thereafter, individual jurisdictions' draft RHNA allocation numbers will be issued in the Draft RHNA Allocation Plan, an appeals process will be conducted, and final RHNA allocations are scheduled to be issued by October 2020.

The staff-recommended final RHNA methodology will utilize final Connect SoCal data for the purpose of calculating each jurisdiction's allocation. These data have recently become available following the January 24, 2020 close of the Connect SoCal public comment period and reflect the data and model updates made since the draft Connect SoCal Plan release on November 7, 2019. While the draft methodology and staff-recommended final methodology are identical, jurisdictions



may see slight changes in their estimated RHNA allocation totals owing to changes in the data, which are used in the measurement of transit access and job access in the RHNA methodology. Region-wide, these data changes are equivalent to no more than 1.69% of the regional total. No further changes to these data are anticipated.

### **Justifications for Adopting RC-Approved Draft Methodology without Change in March 2020**

SCAG is required to distribute a draft RHNA allocation to each city and county in the region prior to adoption of the Connect SoCal Plan scheduled for April 2, 2020 (Government Code 65584.05(a)). Since the draft RHNA allocation shall be based on the adopted final RHNA methodology, adoption of the final RHNA methodology by the Regional Council at its March 5th, 2020 meeting would ensure that SCAG is fully compliant with statutory requirements.

In addition, staff recommends against submitting any alternative draft methodology to HCD at this stage for another 60-day review as it would jeopardize HCD's consistency findings described above, is not provided for in statute, will jeopardize the October 2020 completion of the 6<sup>th</sup> cycle final RHNA allocations, and will jeopardize the ability of local jurisdictions to timely complete their housing element updates by October 2021.

### **FISCAL IMPACT:**

Current work on the Regional Housing Needs Assessment is included in the current FY 19-20 General Fund Budget (800.0160.03: RHNA). There is no immediate fiscal impact for the tasks proposed under these funds.

### **ATTACHMENT(S):**

1. Staff Recommended Final RHNA Methodology Presentation
2. HCD Review of Draft RHNA Methodology
3. Resolution No. 20-619-2 to adopt Final RHNA Methodology and Attachment A
4. Estimated RHNA Allocations
5. RHNA Timeline of Key Activities and Milestones

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# Staff-Recommended Final RHNA Methodology

Kevin Kane, PhD

SCAG Staff

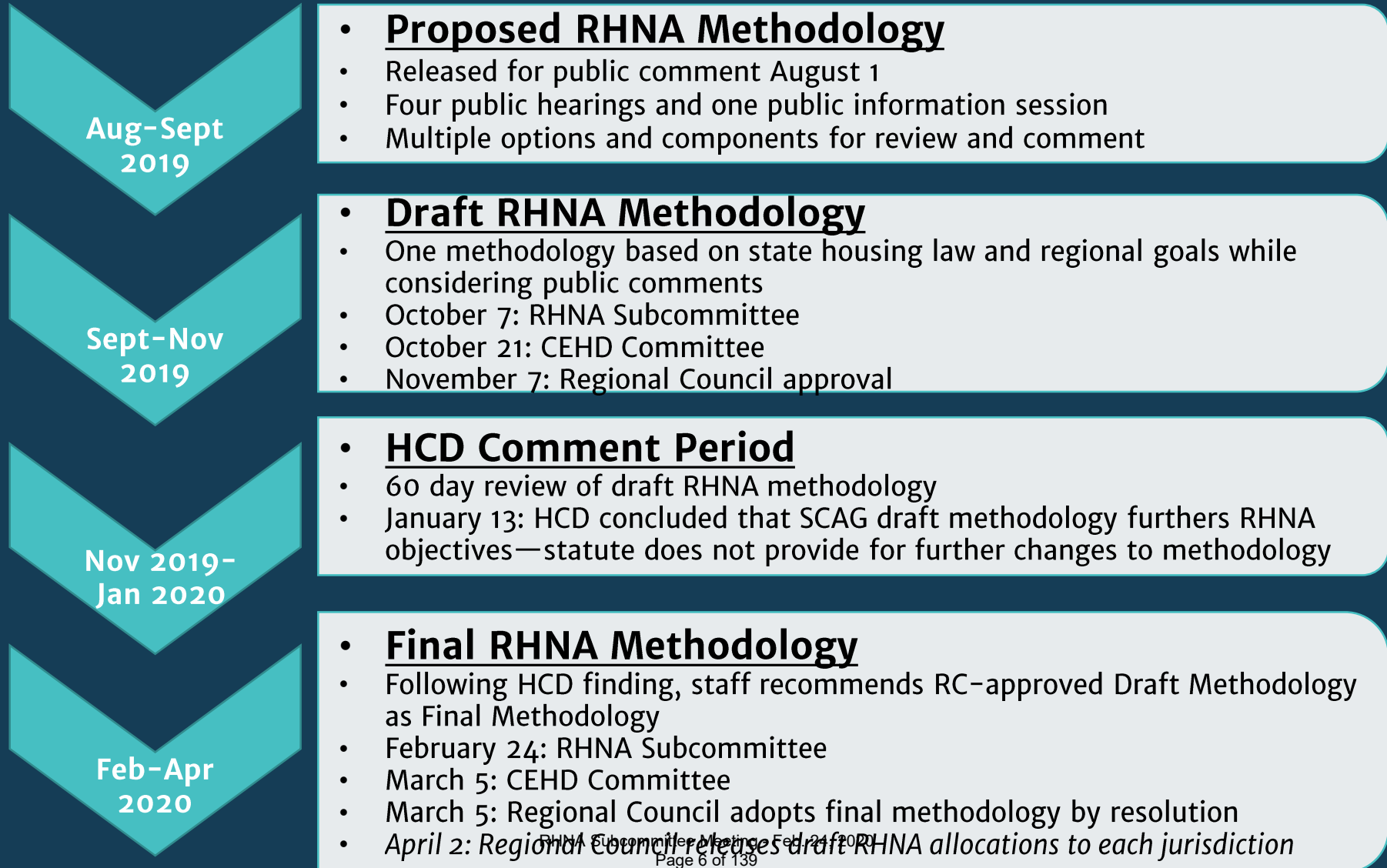
February 24, 2020

[www.scag.ca.gov](http://www.scag.ca.gov)



- RHNA timeline
- HCD and RC-approved draft RHNA methodology and data inputs
- Methodology's performance vs. statutory objectives

# The RHNA Methodology Process



# RHNA Timeline Continued

Apr  
2020

- **Draft RHNA Allocations issued**
- *See detailed appeal timeline.*

Oct  
2020

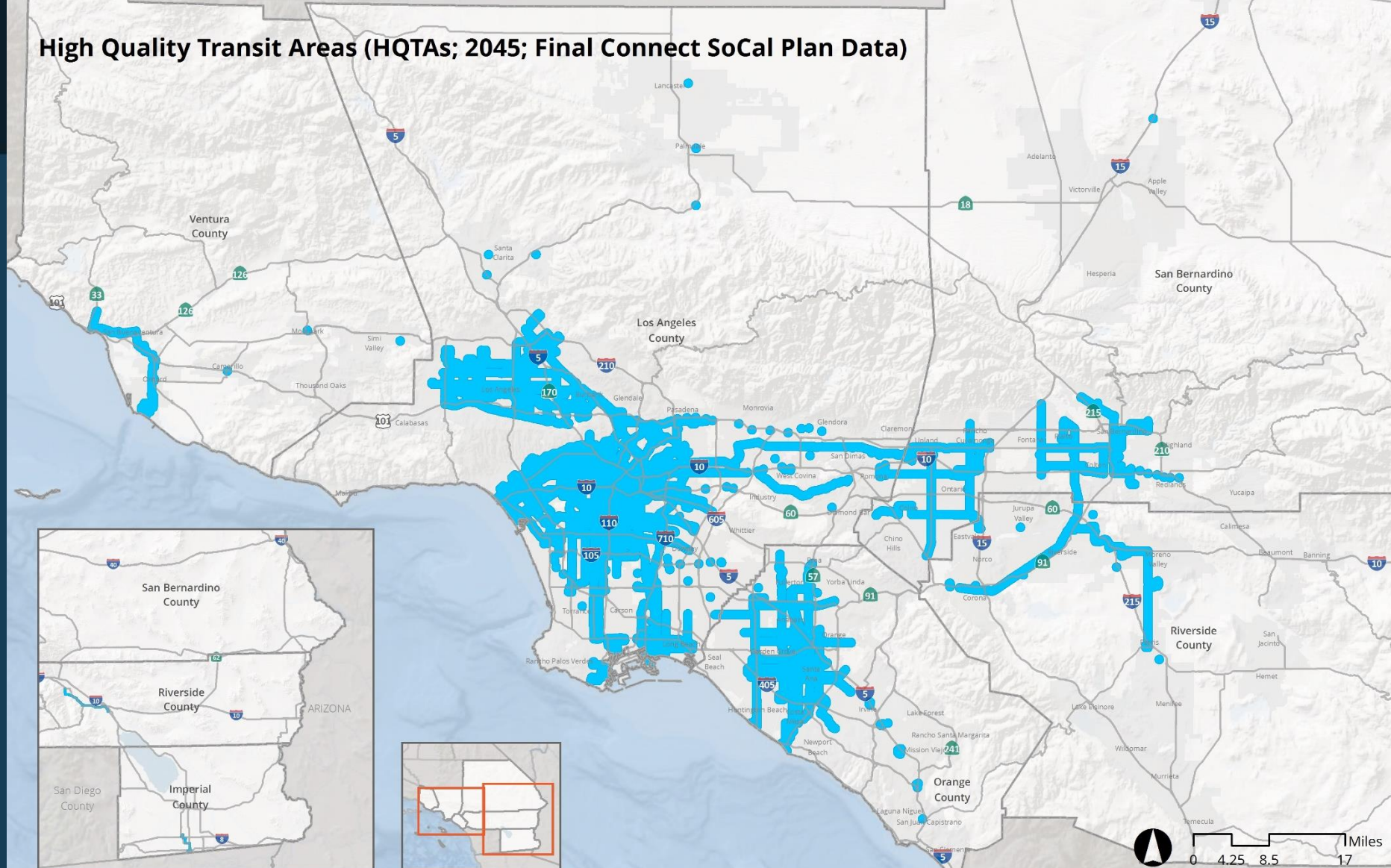
- **Final RHNA Allocation**

Oct  
2021

- **Local Housing Element Updates Due**

# High Quality Transit Areas (HQTAs; 2045; Final Connect SoCal Plan Data)

## HQTA Boundaries using Final Connect SoCal Data



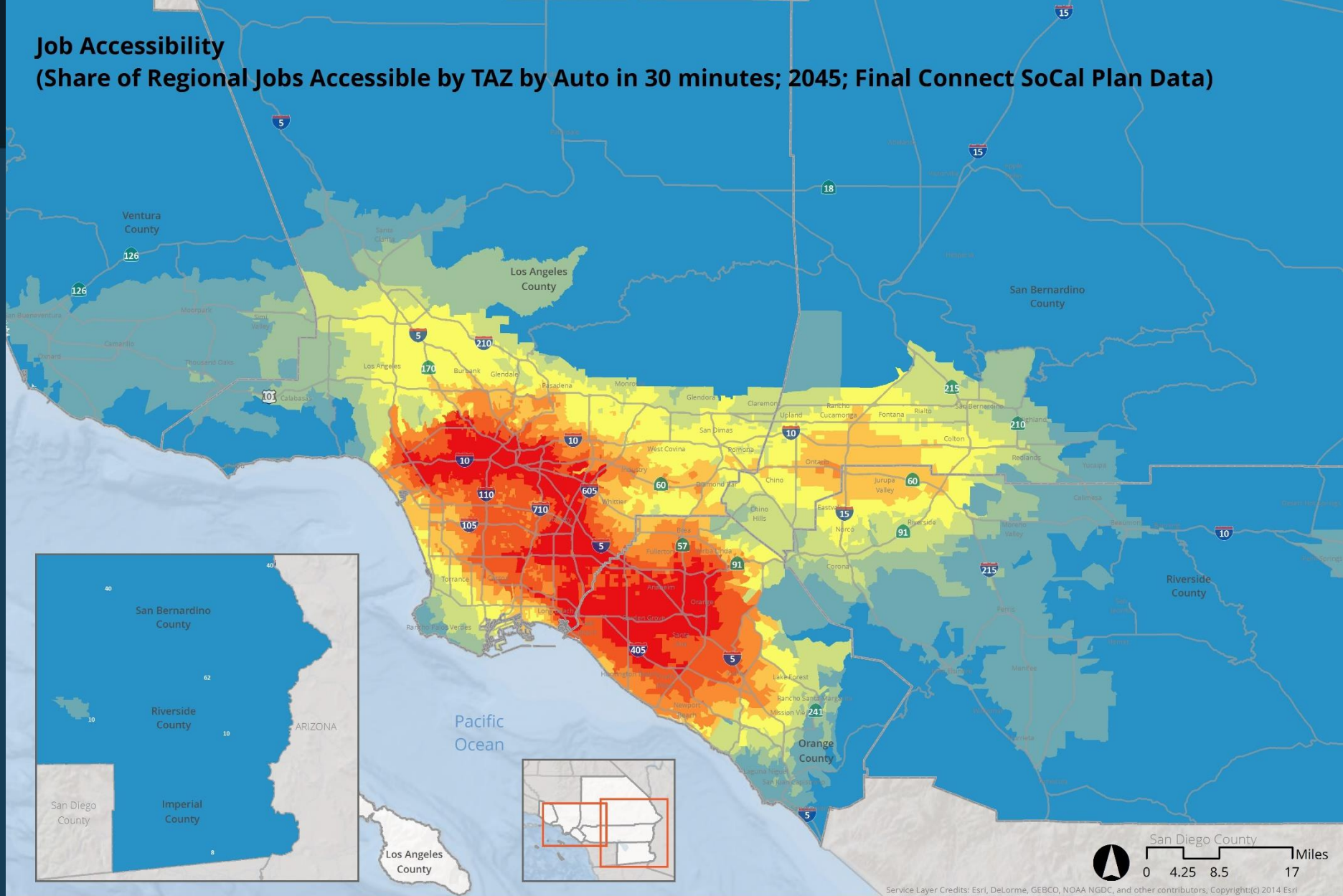
Please note this map depicts the “High Quality Transit Areas (HQTAs)” within the SCAG Region and is based on the planned year transit network for Connect SoCal (the 2020 RTP/SCS) as well as input from County Transportation Commissions. SCAG updates its inventory of planned major transit stops and high quality transit corridors with the adoption of a new RTP/SCS, once every four years. However, transit planning studies may be completed by transit agencies on a more frequent basis than the RTP/SCS is updated by SCAG. Local jurisdictions should consult with the appropriate transit provider(s) to obtain the latest information on planned transit routes, stop locations, and service intervals. This map is intended for planning purposes only, and SCAG shall incur no responsibility or liability as to the completeness, currentness, or accuracy of this information. SCAG assumes no responsibility arising from use of this information by individuals, businesses, or other public entities. The information is provided with no warranty of any kind, expressed or implied, including but not limited to the implied warranties of merchantability and fitness for a particular purpose.

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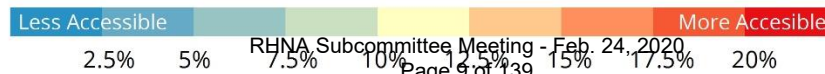
City Boundaries
  High Quality Transit Areas (HQTAs)
  Freeway

**Job Accessibility  
(Share of Regional Jobs Accessible by TAZ by Auto in 30 minutes; 2045; Final Connect SoCal Plan Data)**

**Job  
Accessibility  
using Final  
Connect SoCal  
Data**



Job Accessibility (Share of Regional Jobs Accessible by TAZ by Auto in 30 minutes; 2045; Final Connect SoCal Plan Data)

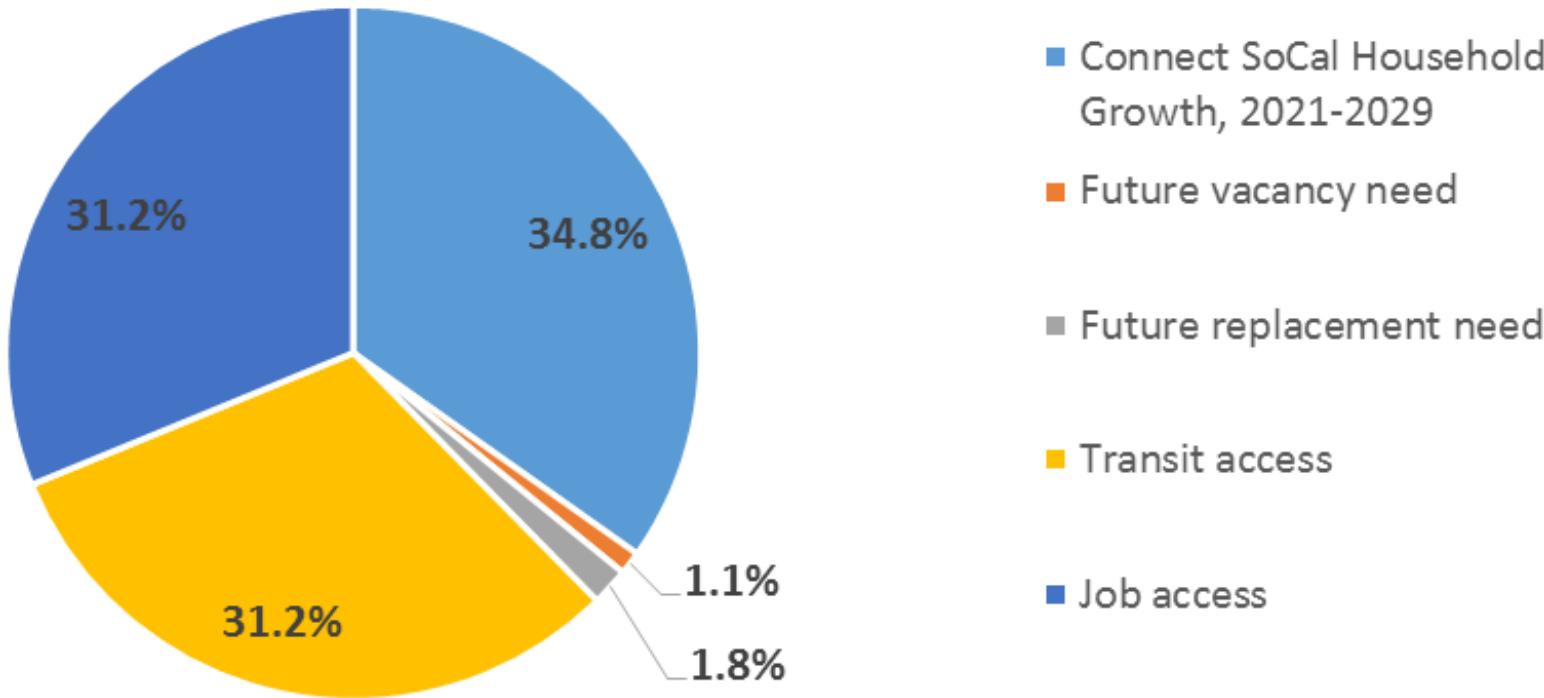




# The RHNA Methodology: A plan to allocate 1,341,827 units to 197 jurisdictions



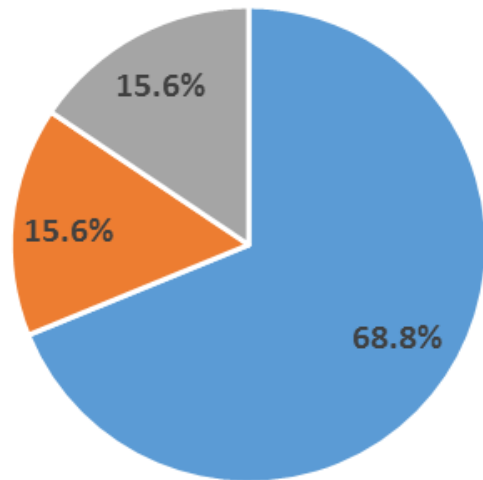
Staff Recommended Final RHNA Methodology - Regional Breakdown



Note: The draft RHNA methodology uses jurisdiction-level Connect SoCal 2020-2030 household growth multiplied by 8.25 to match the duration of the RHNA planning period. At the jurisdictional level, Connect SoCal household growth is identical to local input, and over this time period is perfectly equivalent to the regional RHNA share depicted above.

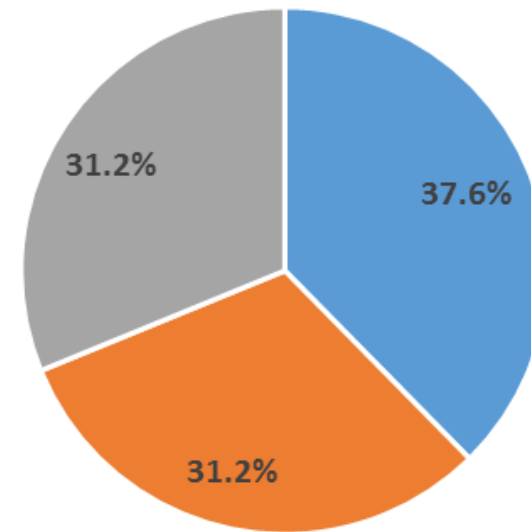
# Comparison vs. Previous Version

Original Recommendation, NOT approved by RC



■ Need due to household growth ■ Job access ■ Transit access

RC-Approved Draft Methodology



■ Need due to household growth ■ Job access ■ Transit access

Note: RC-approved draft methodology included changes to proportional shares of allocation factors, caps, and the redistribution of residual need (i.e. within counties) as compared to the original staff recommendation. These changes results in the differences shown above. See methodology document for details.

Note: In both charts, need due to household growth includes 38,012 units due to future vacancy and replacement need (2.8% of total).

- Comparisons previously presented by SCAG staff
- Comparisons relied upon by HCD in their review

*“HCD has completed its review of the methodology and finds that the draft SCAG RHNA methodology furthers the five statutory objectives of RHNA. HCD acknowledges the complex task of developing a methodology to allocate RHNA to 197 diverse jurisdictions while furthering the five statutory objectives of RHNA. This methodology generally distributes more RHNA, particularly lower income RHNA, near jobs, transit, and resources linked to long term improvements of life outcomes. In particular, HCD applauds the use of objective factors specifically linked the statutory objectives in the existing need methodology.”*

# Review: Statutory Objectives of RHNA

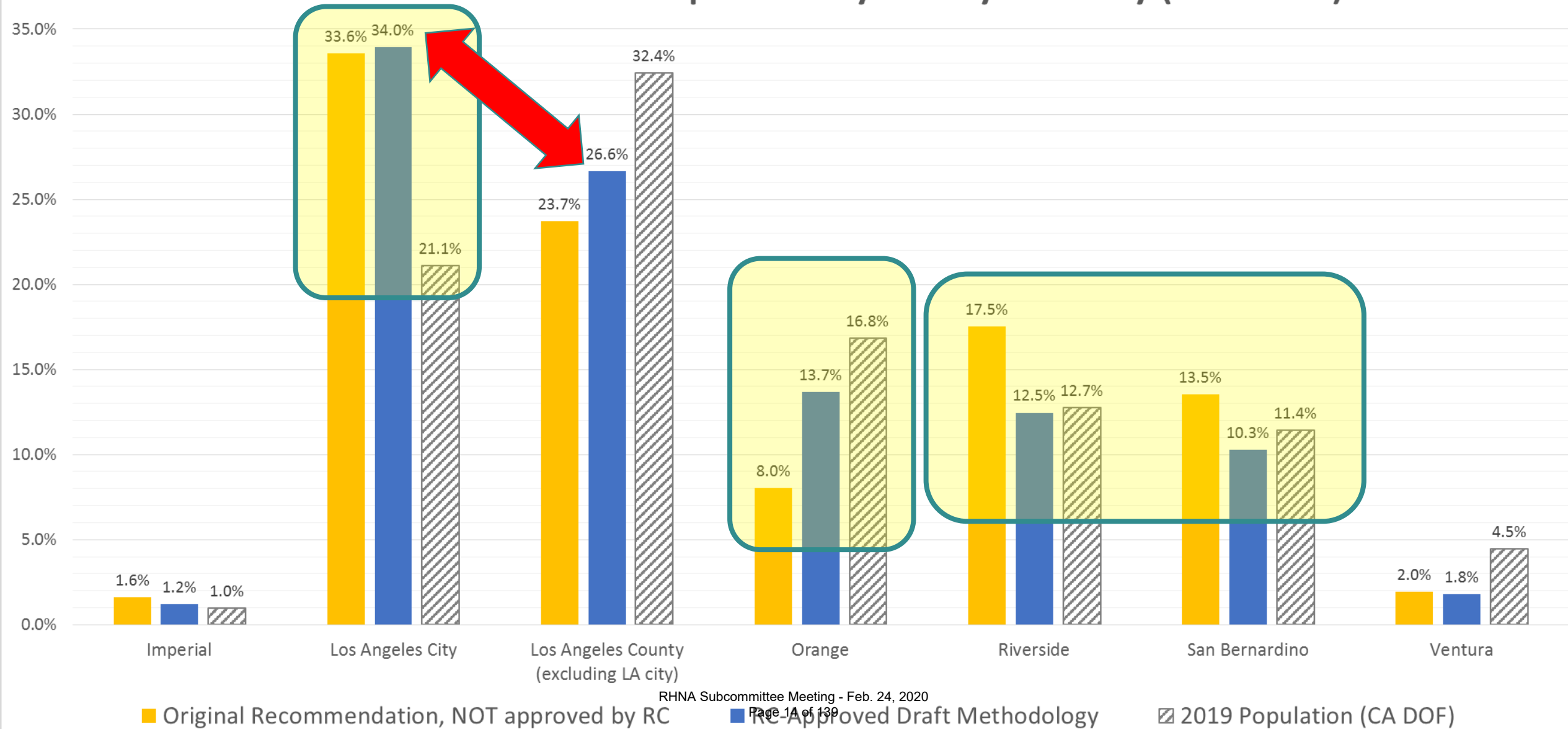
- 1) To increase the housing supply and mix of housing types, tenure and affordability within each region in an equitable manner
- 2) Promoting infill development and socioeconomic equity, the protection of environmental and agricultural resources, and the encouragement of efficient development patterns
- 3) Promoting an improved intraregional relationship between jobs and housing
- 4) Allocating a lower proportion of housing need in income categories in jurisdictions that have a disproportionately high share in comparison to the county distribution
- 5) Affirmatively furthering fair housing (AFFH)



# Re: RHNA objective 1, Equitable Geographic Distribution



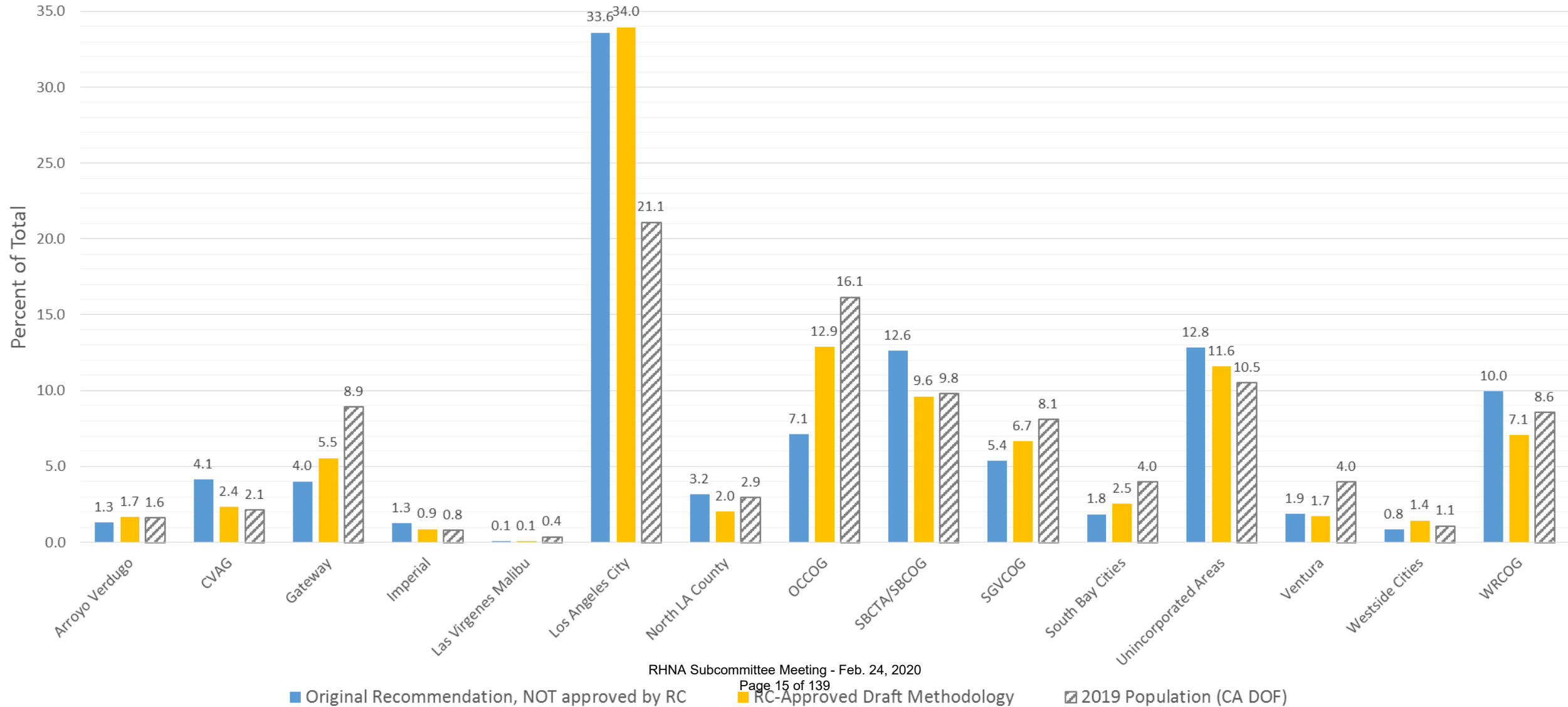
## Share of Total RHNA and Population by County & LA City (% of Total)



# Re: RHNA objective 1, Equitable Geographic Distribution

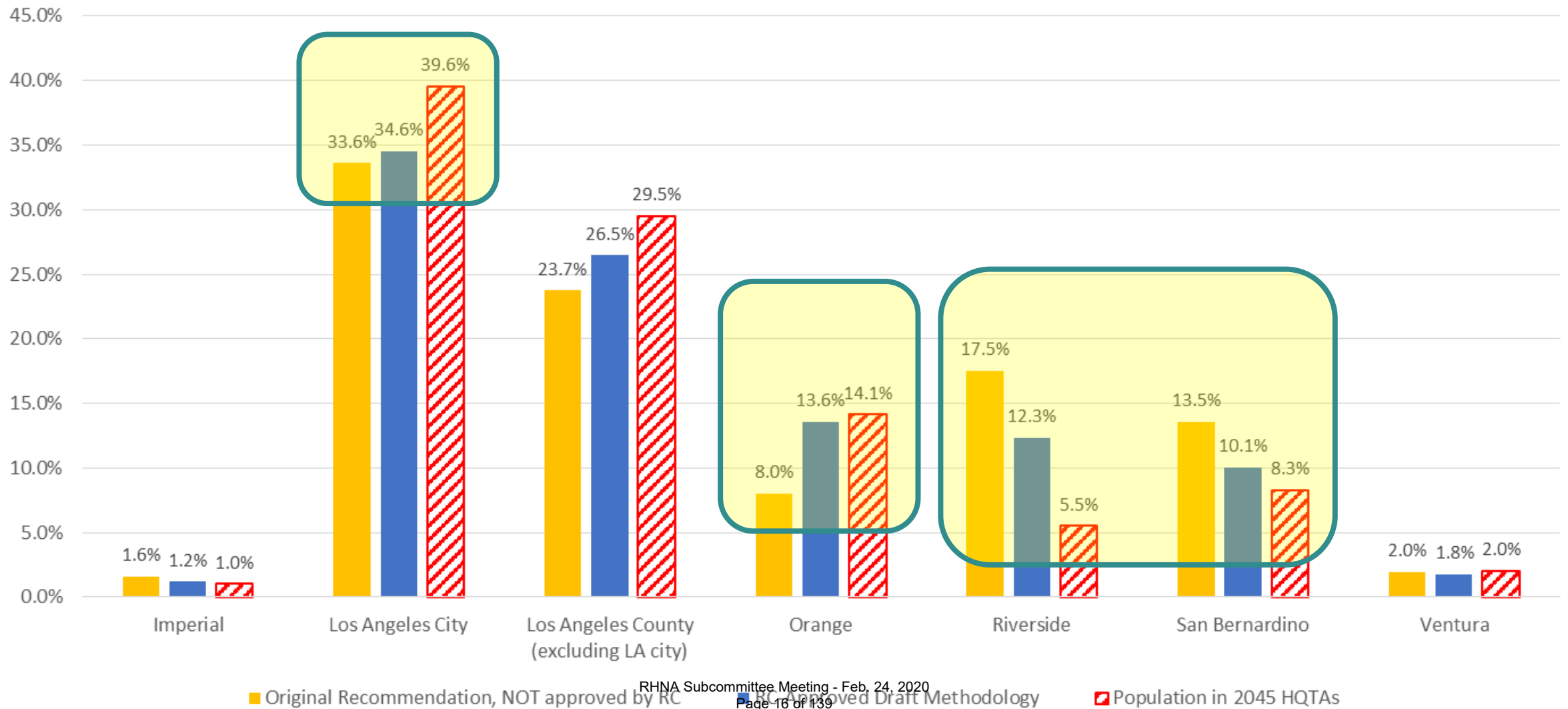


Share of Total RHNA and Population by Subregion (% of Total)



# Re: RHNA Objective 2 – Infill and efficient development

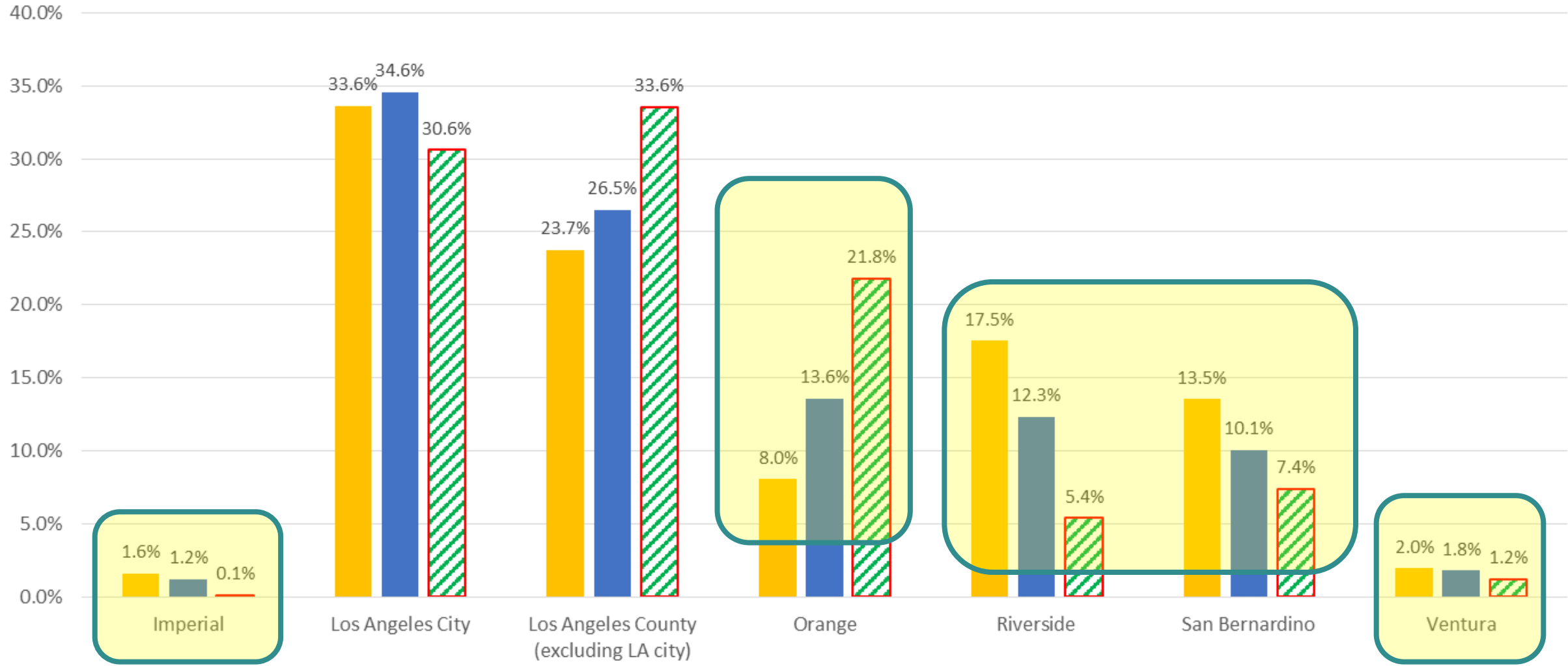
Comparison of total RHNA with transit access measure used in draft methodology



# Re: RHNA Objective 2 – Infill and efficient development and RHNA Objective 3 – Improved intraregional jobs-housing relationships



Comparison of total RHNA with job access measure used in draft methodology



Original Recommendation, NOT approved by RC

RHNA Subcommittee Meeting - Feb. 24, 2020  
Page 17 of 139  
RC-Approved Methodology

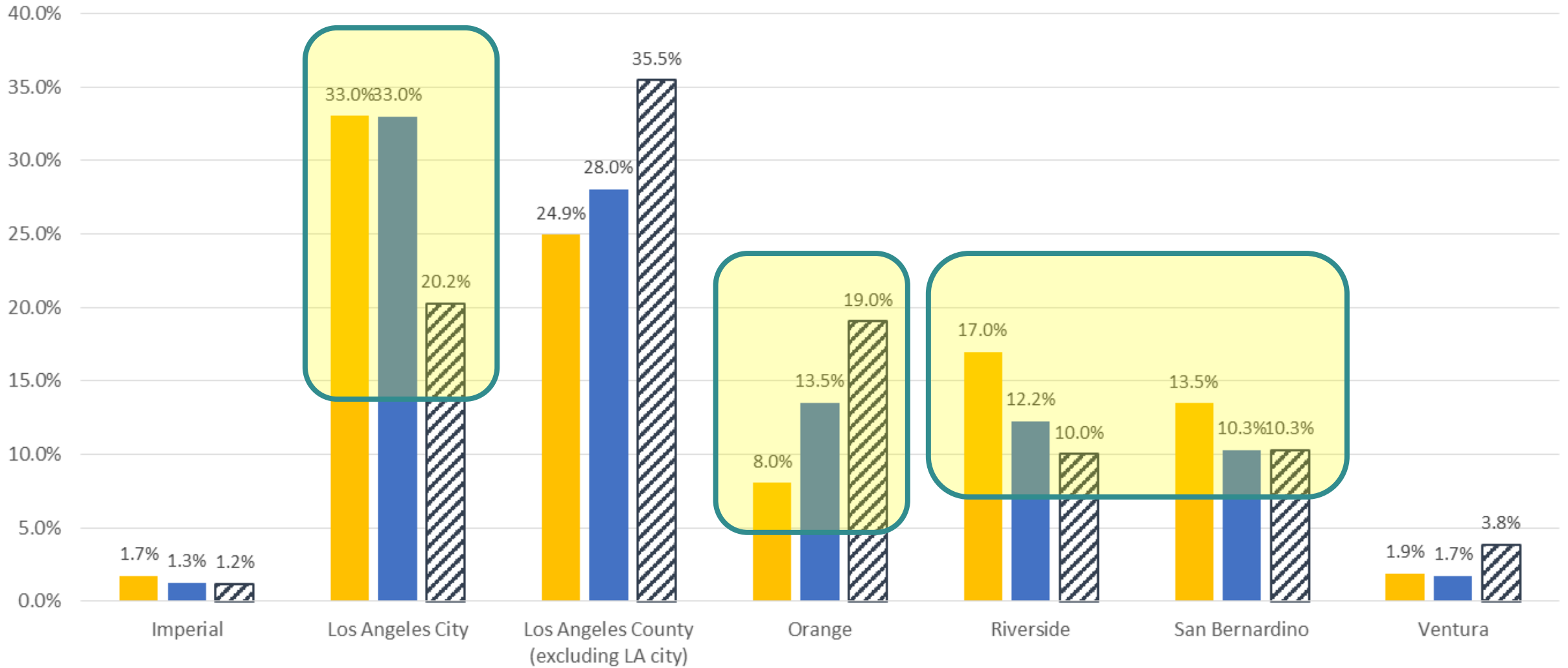
Job Accessibility (Population-Weighted), 2045



# Re: RHNA Objective 3 – Improved intraregional relationships between low-wage jobs and affordable housing



Low-wage jobs and lower-income RHNA allocation



Original Recommendation, NOT approved by RC

RHNA Subcommittee Meeting - Feb. 24, 2020

Page 18 of 189 RC-Approved Draft Methodology

Low-wage jobs, Census LEHD LODES 2017

## Conclusions / Next Steps

- Performance indicators show the RC-approved version *improved* the performance with respect to statutory objectives
- Methodology found to further statutory objectives by HCD:

*“HCD has completed its review of the methodology and finds that the draft SCAG RHNA methodology furthers the five statutory objectives of RHNA. ... In particular, HCD applauds the use of objective factors specifically linked the statutory objectives in the existing need methodology.”*

- Therefore, staff recommends adoption of the draft RHNA methodology as the Final RHNA Methodology by resolution

Thank you.

Kevin Kane, PhD

[kane@scag.ca.gov](mailto:kane@scag.ca.gov)

[www.scag.ca.gov](http://www.scag.ca.gov)



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

2020 W. El Camino Ave  
Sacramento, CA 95833-1829  
916) 263-2911 FAX: (916) 263-7453  
www.hcd.ca.gov



January 13, 2020

Kome Ajise  
Executive Director  
Southern California Association of Governments  
900 Wilshire Boulevard, Suite 1700  
Los Angeles, CA 90017

Dear Executive Director Ajise:

**RE: Review of Draft Regional Housing Need Allocation (RHNA) Methodology**

Thank you for submitting the draft Southern California Association of Governments (SCAG) Sixth Cycle Regional Housing Need Allocation (RHNA) Methodology. Pursuant to Government Code Section 65584.04(i), the California Department of Housing and Community Development (HCD) is required to review draft RHNA methodology to determine whether the methodology furthers the statutory objectives described in Government Code Section 65584(d).

In brief, the draft SCAG RHNA methodology begins with the total regional determination provided by the California Department of Housing and Community Development (HCD) and separates it into two methodologies to allocate the full determination: projected need (504,970) and existing need (836,857).

For projected need, the household growth projected in SCAG's Connect SoCal growth forecast for the years 2020-2030 is used as the basis for calculating projected housing need for the region. A future vacancy and replacement need are also calculated and added to the projected need.

The existing need is calculated by assigning 50 percent of regional existing need based on a jurisdiction's share of the region's population within the high-quality transit areas (HQTAs) based on future 2045 HQTAs. The other 50 percent of the regional existing need is based on a jurisdiction's share of the region's estimated jobs in 2045 that can be accessed within a 30-minute driving commute. For high segregation and poverty areas as defined by [HCD/TCAC Opportunity Maps](#),<sup>1</sup> referred to by SCAG as extremely disadvantaged communities (DACs), existing need in excess of the 2020-2045 household growth forecast is reallocated to non-DAC jurisdictions within the same county.

*--continued on next page--*

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<sup>1</sup> Created by the California Fair Housing Task Force and commissioned by HCD and the California Tax Credit Allocation Committee (TCAC) to assist public entities in affirmatively furthering fair housing. The version used in this analysis is the 2019 HCD/TCAC Opportunity Maps available at [treasurer.ca.gov/ctcac/opportunity.asp](http://treasurer.ca.gov/ctcac/opportunity.asp).

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Within both the projected and existing need methodologies the four RHNA income categories (very low, low, moderate, and above moderate) are assigned to each jurisdiction by the use of a 150 percent social equity adjustment, which inversely adjusts based on the current incomes within the jurisdiction. An additional percentage of social equity adjustment is made for jurisdictions that have a high concentration of DACs or Highest Resource areas as defined by the HCD/TCAC Opportunity maps. Overall, the social equity adjustments result in greater shares of lower income RHNA to higher income and higher-resource areas.

**HCD has completed its review of the methodology and finds that the draft SCAG RHNA Methodology furthers the five statutory objectives of RHNA.<sup>2</sup>**

HCD acknowledges the complex task of developing a methodology to allocate RHNA to 197 diverse jurisdictions while furthering the five statutory objectives of RHNA. This methodology generally distributes more RHNA, particularly lower income RHNA, near jobs, transit, and resources linked to long term improvements of life outcomes. In particular, HCD applauds the use of objective factors specifically linked the statutory objectives in the existing need methodology.

Below is a brief summary of findings related to each statutory objective described within Government Code Section 65584(d):

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

The methodology generally allocates increased shares of lower income RHNA to jurisdictions that have higher housing costs. In support of a mix of affordability, the highest housing cost cities generally receive higher shares of lower income RHNA. Under this methodology the 15 cities with the highest median housing costs all receive greater than 50 percent of the RHNA as lower income RHNA. Beverly Hills with the 18<sup>th</sup> highest median housing costs receives the 25<sup>th</sup> highest share of lower income RHNA; Westlake Village with the 14<sup>th</sup> highest median housing costs receives the 12<sup>th</sup> highest share of lower income RHNA; Aliso Viejo with the 23<sup>rd</sup> highest median housing costs receives the 38<sup>th</sup> highest share of lower income RHNA; and Villa Park with the 10<sup>th</sup> highest median housing costs receives the 31<sup>st</sup> highest share of lower income RHNA.

*2. Promoting infill development and socioeconomic equity, the protection of environmental and agricultural resources, the encouragement of efficient development patterns, and the achievement of the region's greenhouse gas reductions targets provided by the State Air Resources Board pursuant to Section 65080.*

The draft SCAG RHNA methodology furthers the environmental principles of this objective as demonstrated by the transportation and job alignment with the RHNA allocations.

--continued on next page--

<sup>2</sup> While HCD finds that this particular methodology furthers the objectives of RHNA, HCD's determination is subject to change depending on the region or cycle, as housing conditions in those circumstances may differ.

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*3. Promoting an improved intraregional relationship between jobs and housing, including an improved balance between the number of low-wage jobs and the number of housing units affordable to low-wage workers in each jurisdiction.*

Half of the existing need portion of the draft SCAG RHNA methodology is set based on the jurisdiction's share of the region's estimated jobs in 2045. While future looking job projections are important for housing planning, and housing built in the next decade will likely exist for 50-100 years or more, it is also critical to plan for the needs that exist today. This objective specifically considers the balance of low-wage jobs to housing available to low-wage workers. As part of HCD's analysis as to whether this jobs-housing fit objective was furthered by SCAG's draft methodology, HCD analyzed how the percentage share of the region's lower income RHNA compared to the percentage share of low-wage jobs.

For example, under the draft SCAG RHNA methodology Irvine would receive 1.84 percent of the region's lower income RHNA, and currently has 2.07 percent of the region's low-wage jobs, .23 percent less lower income RHNA than low-wage jobs for the region. Pomona would receive .71 percent of the region's lower income RHNA, and currently has .57 percent of the region's low-wage jobs, .13 percent more lower income RHNA than low-wage jobs for the region. Across all jurisdictions there is generally good alignment between low-wage jobs and lower income RHNA, with all but 15 jurisdictions within a half percent plus or minus difference between their share of lower income RHNA for the region and their percentage low-wage jobs for the region.

HCD is aware there has been some opposition to this current methodology from jurisdictions that received lower allocations under prior iterations; however it is worth noting that even if it is by a small amount, many of the jurisdictions that received increases are still receiving lower shares of the region's lower income RHNA compared to their share of the region's low-wage jobs. HCD recommends any changes made in response to appeals should be in the interest of seeking ways to more deeply further objectives without compromising other objectives.

*4. Allocating a lower proportion of housing need to an income category when a jurisdiction already has a disproportionately high share of households in that income category, as compared to the countywide distribution of households in that category from the most recent American Community Survey.*

This objective is furthered directly by the social equity adjustment factor included in the draft SCAG RHNA methodology. Jurisdictions in the SCAG region range from as little as 10.9 percent lower income households to 82.7 percent lower income households. The 20 jurisdictions with the greatest share of lower income households, 67.2-82.7 percent lower income households, would receive an average of 31.6 percent lower income share of their RHNA; compared to the 20 jurisdictions with the lowest share of lower income households, 10.9-25.1 percent lower income households, would receive an average of 59.1 percent lower income share of their RHNA. While the social equity adjustment explicitly responds to objective four, it also assists in the methodology furthering each of the other objectives.

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*5. Affirmatively furthering fair housing, which means taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics. Specifically, affirmatively furthering fair housing means taking meaningful actions that, taken together, address significant disparities in housing needs and in access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws.*

HCD applauds the inclusion of the affirmatively furthering fair housing adjustment factor in the methodology. This factor directs more lower income RHNA to higher opportunity areas and reduces allocations in segregated concentrated areas of poverty, as defined in the [HCD/TCAC Opportunity Maps](#), which evaluate access to opportunity, racial segregation, and concentrated poverty on 11 dimensions, which are all evidence-based indicators related to long term life outcomes. 14 of the top 15 highest shares of lower income RHNA are in regions over 99.95 percent High and Highest Resource areas. These include: Imperial, La Habra Heights, Rolling Hills Estates, Hermosa Beach, La Cañada Flintridge, Palos Verdes Estates, Manhattan Beach, Rolling Hills, Agoura Hills, Rancho Palos Verdes, Westlake Village, San Marino, Eastvale, and Hidden Hills. With the exceptions of the cities of Vernon and Industry, the 31 jurisdictions with the highest share of lower income RHNA are all over 95 percent High and Highest Resource areas.

HCD appreciates the active role of SCAG staff in providing data and input throughout the draft SCAG RHNA methodology development and review period. HCD especially thanks Ping Chang, Kevin Kane, Sarah Jepson, and Ma'Ayn Johnson for their significant efforts and assistance.

HCD looks forward to continuing our partnership with SCAG to assist its member jurisdictions to meet and exceed the planning and production of the region's housing need.

Support opportunities available for the SCAG region this cycle include, but are not limited to:

- SB 2 Planning Technical Assistance (Technical assistance available now through June 2021)
- Regional and Local Early Action Planning grants (25 percent of Regional funds available now, all other funds available early 2020)
- SB 2 Permanent Local Housing Allocation (Available April – July 2020)

If HCD can provide any additional assistance, or if you, or your staff, have any questions, please contact Megan Kirkeby, Assistant Deputy Director for Fair Housing, [megan.kirkeby@hcd.ca.gov](mailto:megan.kirkeby@hcd.ca.gov).



Megan Kirkeby  
Assistant Deputy Director for Fair Housing





RESOLUTION NO. 20-619-2

A RESOLUTION OF THE SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS (SCAG) ADOPTING THE FINAL REGIONAL HOUSING NEEDS ASSESSMENT (RHNA) METHODOLOGY FOR THE SIXTH HOUSING ELEMENT CYCLE (2021 – 2029)

SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS 900 Wilshire Blvd., Ste. 1700 Los Angeles, CA 90017 T: (213) 236-1800 www.scag.ca.gov

WHEREAS, the Southern California Association of Governments (SCAG) is the Metropolitan Planning Organization, for the six county region consisting of Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial Counties;

REGIONAL COUNCIL OFFICERS

- President Bill Jahn, Big Bear Lake
First Vice President Rex Richardson, Long Beach
Second Vice President Clint Lorimore, Eastvale
Immediate Past President Alan D. Wapner, San Bernardino County Transportation Authority

WHEREAS, California state housing element law requires that the Southern California Association of Governments (SCAG) adopt a methodology for distributing the existing and projected regional housing need to each of the local jurisdictions within the SCAG region;

WHEREAS, the California Department of Housing and Community Development (HCD) is required to consult with SCAG in determining the existing and projected housing need for the region prior to each housing element cycle;

COMMITTEE CHAIRS

- Executive/Administration Bill Jahn, Big Bear Lake
Community, Economic & Human Development Peggy Huang, Transportation Corridor Agencies
Energy & Environment Linda Parks, Ventura County
Transportation Cheryl Viegas-Walker, El Centro

WHEREAS, on October 15, 2019, HCD provided SCAG with a regional housing need number of 1,341,827 units distributed among four income categories, very-low (26.2%), low (15.4%), moderate (16.7%), and above-moderate (41.7%) for the 6th Housing Element Cycle (2021-2029);

WHEREAS, SCAG conducted four public hearings in August 2019 to formally receive verbal and written comments on the proposed Regional Housing Needs Assessment (RHNA) methodology options, in addition to one public information session with a total of approximately 250 participants. Almost 250 written comments were submitted to SCAG specifically on the proposed methodology and over 35 verbal comments were shared at the four public hearings;

WHEREAS, after considering the public comments received, at its November 7, 2019 meeting, the SCAG Regional Council approved and submitted to HCD the Draft RHNA Methodology for the 6th Housing Element Cycle, for a 60-day review;

WHEREAS, on January 13, 2020, HCD determined that the Draft RHNA methodology furthers the objectives set forth in state law, California Government Code Section 65584(d);

**NOW, THEREFORE, BE IT RESOLVED**, that the SCAG Regional Council adopts the Final RHNA Methodology for the Sixth Housing Element Cycle (2021 – 2029) attached hereto as “Attachment A” and incorporated herein by this reference.

**PASSED, APPROVED AND ADOPTED** by the Regional Council of the Southern California Association of Governments at its regular meeting this 5th day of March, 2020.

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William “Bill” Jahn  
President, SCAG

Attested by:

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Kome Ajise  
Executive Director

Approved as to Form:

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Justine Block  
Acting Chief Counsel

**Staff-Recommended FINAL RHNA Allocation Methodology**

**EXECUTIVE SUMMARY**

*SCAG is required to develop a final RHNA methodology to distribute existing and projected housing need for the 6th cycle RHNA for each jurisdiction, which will cover the planning period October 2021 through October 2029. Following extensive feedback from stakeholders during the proposed methodology comment period and an extensive policy discussion, SCAG’s Regional Council voted to approve the Draft RHNA Methodology on November 7, 2019, as described below, and provide it to the State Department of Housing and Community Development (HCD) for their statutory review. On January 13, 2020, HCD completed its review of the draft methodology and found that it furthers the five statutory objectives of RHNA.*

*As the draft methodology has been approved by the Regional Council and found to be consistent with state housing law by HCD, no changes are required and staff recommends the draft methodology as the final methodology. The overall framework for this methodology is included in the table below and further described in the rest of this document.*

Projected need	Existing need	Income categories
Household growth 2020-2030	Transit accessibility (HQTA population 2045)	150% social equity adjustment minimum
Future vacancy need	Job accessibility	0-30% additional adjustment for areas with lowest or highest resource concentration
Replacement need	Residual distribution within the county	

**HOUSING CRISIS**

There is no question that there is an ongoing housing crisis throughout the State of California. A variety of measures indicate the extent of the crisis including overcrowding and cost-burdened households, but the underlying cause is due to insufficient housing supply despite continuing population growth over recent decades.

As part of the RHNA process SCAG must develop a final RHNA methodology, which will determine each jurisdiction’s draft RHNA allocation as a share of the regional determination of existing and projected housing need provided by the California Department of Housing and Community Development (HCD). There are several requirements outlined by Government Code Section 65584.04, which will be covered in different sections of this packet:

- Allocation methodology, per Government Code 65584.04(a)
- How the allocation methodology furthers the objectives State housing law, per GC 65584.04(f)
- How local planning factors are incorporated into the RHNA methodology, per GC 65584.04(f)
- Furthering the objectives of affirmatively furthering fair housing (AFFH), per GC 65584.04(d)
- Public engagement, per GC 65584.04(d)

Additionally, SCAG has developed a dynamic estimator tool and data appendix that contains a full set of various underlying data and assumptions to support the recommended final methodology. Due to the size of the appendix, a limited number of printed copies are available. SCAG has posted the dynamic estimator tool and full methodology appendix, on its RHNA webpage: [www.scag.ca.gov/rhna](http://www.scag.ca.gov/rhna).

Per State housing law, the RHNA methodology must distribute existing and projected housing need to all jurisdictions. The following section provides the staff-recommended final methodology for distributing projected and existing need to jurisdictions from the RHNA regional determination provided by the California Department of Housing and Community Development (HCD) pursuant to Government Code Section 65584.01.

#### Guiding Principles for RHNA Methodology

In addition to furthering the five objectives pursuant to Government Code 65585(d), there are several guiding principles that SCAG staff has developed to use as the basis for developing the distribution mechanism for the RHNA methodology. These principles are based on the input and guidance provided by the RHNA Subcommittee during their discussions on RHNA methodology between February 2019 and June 2019.

1. The housing crisis is a result of housing building not keeping up with growth over the last several decades. The RHNA allocation for all jurisdictions is expected to be higher than the 5<sup>th</sup> RHNA cycle.
2. Each jurisdiction must receive a fair share of their regional housing need. This includes a fair share of planning for enough housing for all income levels, and consideration of factors that indicate areas that have high and low concentration of access to opportunity.
3. It is important to emphasize the linkage to other regional planning principles to develop more efficient land use patterns, reduce greenhouse gas emissions, and improve overall quality of life.

The jurisdictional boundaries used in the recommended RHNA methodology will be based on those as of August 31, 2016. Spheres of influence in unincorporated county areas are considered within unincorporated county boundaries for purposes of RHNA.

#### Proposed RHNA Allocation Methodology

The proposed RHNA methodology, which was released for public review on August 1, contained three (3) options to distribute HCD's regional determination for existing and projected need for the

SCAG region. HCD provided SCAG a final regional determination of 1,341,827 units for the 6<sup>th</sup> cycle RHNA on October 15, 2019.<sup>1</sup>

The three options were developed based on RHNA Subcommittee feedback on various factors at their meetings between February and June 2019 and feedback from stakeholders. SCAG solicited formal public comment on the three options and any other factors, modifications, or alternative options during the public comment period, which commenced on August 1 and concluded on September 13, 2019.

Four public hearings were conducted to formally receive verbal and written comments on the proposed RHNA methodology, in addition to one public information session with a total participation of approximately 250 people. Almost 250 written comments were submitted to SCAG specifically on the proposed methodology and over 35 verbal comments were shared at four (4) public hearings held in August 2019.

#### Draft and Final RHNA Allocation Methodology

Based on comments received during the public comment period, staff recommended a combination of the three options in the proposed methodology further enhanced by factors specifically suggested by stakeholders.

On November 7, 2019, SCAG's Regional Council voted to approve the Draft RHNA Methodology. The approved draft methodology includes modifications to the staff-recommended draft methodology for calculating existing housing need to more closely align the methodology with job and transit accessibility factors.

On January 13, 2020, HCD completed their statutory review and found that SCAG's Draft RHNA Methodology furthers the five statutory objectives of RHNA, which allows SCAG to finalize the RHNA methodology and issue draft RHNA allocations to each individual jurisdiction. HCD's comment letter, which can be found at [www.scag.ca.gov/rhna](http://www.scag.ca.gov/rhna), notes:

*"HCD has completed its review of the methodology and finds that the draft SCAG RHNA methodology furthers the five statutory objectives of RHNA. HCD acknowledges the complex task of developing a methodology to allocate RHNA to 197 diverse jurisdictions while furthering the five statutory objectives of RHNA. This methodology generally distributes more RHNA, particularly lower income RHNA, near jobs, transit, and resources linked to long term improvements of life outcomes. In particular, HCD applauds the use of objective factors specifically linked the statutory objectives in the existing need methodology."*

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<sup>1</sup> On September 5, 2019, the SCAG Regional Council voted to object to HCD the regional determination of 1,344,740, per Government Code Section 65584.01, that was provided on August 15, 2019. After review of SCAG's objection letter, HCD provided a final regional determination of 1,341,827 units on October 15, 2019.

Following this finding, staff recommends the draft RHNA methodology as the final RHNA methodology. Since some of the data inputs to the draft RHNA methodology utilized draft Connect SoCal data, the staff-recommended final RHNA methodology will utilize final Connect SoCal data.

The finding of compliance from HCD allows SCAG's Regional Council to adopt the final RHNA methodology and send a draft RHNA allocation to each local jurisdiction. Following a separate appeals phase described in Government Code 65584.05 et seq., RHNA allocations will be finalized in approximately October 2020.

The next section describes the staff-recommended final RHNA methodology mechanism to distribute the 1,341,827 housing units determined by HCD to all SCAG jurisdictions.

#### Determining Existing Need and Projected Need

The staff-recommended final RHNA methodology starts with the total regional determination provided by HCD and separates existing need from projected need.

Projected need is considered as household growth for jurisdictions between the RHNA projection period between July 1, 2021 and October 1, 2029, in addition to a calculated future vacancy need and replacement need. For projected household growth, SCAG's Connect SoCal growth forecast for the years 2020-2030 is used as the basis for calculating projected housing unit need for the region. The anticipated growth in households over this period is multiplied by 0.825 to approximate growth during the 8.25-year RHNA projection period of July 1, 2021 to October 1, 2029.

For several jurisdictions, SCAG's growth forecast includes projected household growth on tribal land. For these jurisdictions, SCAG's estimate of household growth on tribal land from July 1, 2021 to October 1, 2029 is subtracted from the jurisdictional projected household growth (see note in the accompanying dynamic estimator tool). A vacancy adjustment of 1.5% for owner-occupied units and 5% for renter-occupied units representing healthy-market vacancy will be applied to projected household growth to determine future vacancy need. Next a replacement need is added, which is an estimate of expected replacement need over the RHNA period. **Based on these components, the regional projected need is 504,970 units.**

Existing need is considered the remainder of the regional determination after projected need is subtracted. **Based on this consideration, the regional existing need is 836,857 units.**

#### Determining a Jurisdiction's RHNA Allocation (Existing and Projected Need)

In determining the existing need and projected need for the region, the methodology applies a three-step process to determine a jurisdiction's RHNA allocation by income category:

1. Determine a jurisdiction's projected housing need
  - a. Assign household growth to jurisdictions based on SCAG's Connect SoCal Regional Transportation Plan/Sustainable Communities Strategy Growth Forecast between 2020 and 2030

- b. Calculate a jurisdiction’s future vacancy need by applying a healthy market vacancy rate separately to the jurisdiction’s owner and renter households
  - c. Assign a replacement need to jurisdictions based on each jurisdiction’s share of regional net replacement need based on information collected from the replacement need survey submitted by local jurisdictions
2. Determine a jurisdiction’s existing housing need
    - a. Assign 50 percent of regional existing need based on a jurisdiction’s share of region’s population within the high quality transit areas (HQTAs) based on future 2045 HQTAs
    - b. Assign 50 percent of regional existing need based on a jurisdiction’s share of the region’s jobs that can be accessed within a 30-minute driving commute
    - c. For extremely disadvantaged communities (hereafter “DACs,” see definition below), identify residual existing need, which is defined herein as total housing need in excess of household growth between 2020 and 2045<sup>2</sup>. DACs are jurisdictions with more than half of the population living in high segregation and poverty or low resource areas as defined by the California Tax Credit Allocation Committee (TCAC)/HCD Opportunity Index Scores further described in the document.
    - d. Reallocate residual existing need by county to non-DAC jurisdictions within the same county based on the formula in (a) and (b) above, i.e. 50% transit accessibility and 50% job accessibility.
  3. Determine a jurisdiction’s total housing need
    - a. Add a jurisdiction’s projected housing need from (1) above to its existing housing need from (2) above to determine its total housing need.
  4. Determine four RHNA income categories (very low, low, moderate, and above moderate)
    - a. Use a minimum 150% social equity adjustment
    - b. Add an additional percentage of social equity adjustment to jurisdictions that have a high concentration of very low or very high resource areas using the California Tax Credit Allocation Committee (TCAC)’s index scoring
      - i. Add a 10% social equity adjustment to areas that are designated as 70-80% very high or very low resource area
      - ii. Add a 20% social equity adjustment to areas that are designated as 81-90% very high or very low resource area
      - iii. Add a 30% social equity adjustment to areas that are designated as 91-100% very high or very low resource area

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<sup>2</sup> Since HCD’s regional determination of 1,341,827 exceeds SCAG’s 2020-2045 household growth forecast of 1,297,000 by 3.46 percent, for the purposes of existing need allocation, exceeding “local input” or more accurately, Connect SoCal Growth Forecast, household growth shall mean exceeding 1.0368 times household growth.

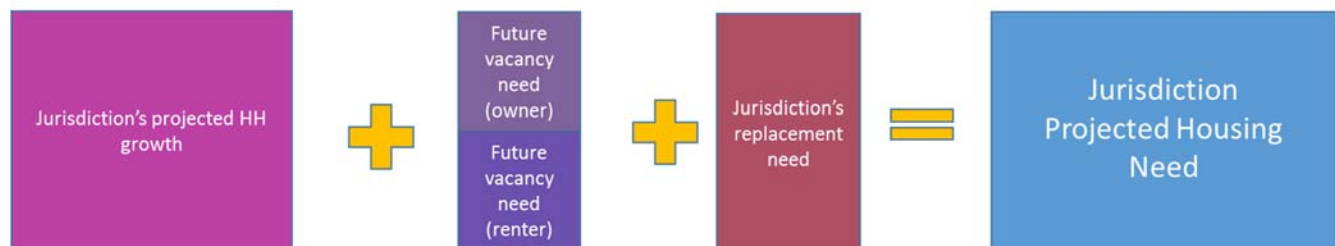
Methodology Component	Assigned units
Projected need: Household growth	466,958
Projected need: Future vacancy need	14,467
Projected need: Replacement need	23,545
Projected need subtotal	504,970

	Percentage of Existing Need	Assigned units
Existing need: Transit accessibility	50%	418,429
Existing need: Job accessibility	50%	418,428
Existing need subtotal		836,857

Total regional need	1,341,827
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### Step 1: Determine Projected Housing Need

The first step of the RHNA methodology is to determine a jurisdiction’s projected need. From the regional determination, projected need is considered to be regional household growth, regional future vacancy need, and regional replacement need.



To determine a jurisdiction’s projected need, SCAG staff recommends a three-step process:

- a. Determine the jurisdiction’s regional projected household growth based on local input
- b. Determine future vacancy need based on a jurisdiction’s existing composition of owner and renter households and apply a vacancy rate on projected household growth based on the following:
  - a. Apply a 1.5% vacancy need for owner households
  - b. Apply a 5.0% vacancy need for renter households
- c. Determine a jurisdiction’s net replacement need based on replacement need survey results



## Step 1a: Projected Household Growth

SCAG's Connect SoCal regional growth forecast reflects recent and past trends, key demographic and economic assumptions, and local, regional, state, and national policy. SCAG's regional growth forecasting process also emphasizes the participation of local jurisdictions and other stakeholders. The growth forecast process kicked off on May 30, 2017 with a panel of experts meeting wherein fifteen academic scholars and leading practitioners in demographics and economics were invited to review key input assumptions for the growth forecast including expected job growth, labor force participation, birth rates, immigration and household formation rates. SCAG staff then incorporated the recommendations of the panel of experts into a preliminary range of population, household, and employment growth figures for 2016, 2020, 2030, 2035, and 2045 for the region and six counties individually.

SCAG further projects jurisdiction-level and sub-jurisdiction-level employment, population, and households using several major data sources, including:

- California Department of Finance (DOF) population and household estimates;
- California Employment Development Department (EDD) jobs report by industry;
- 2015 existing land use and General Plans from local jurisdictions;
- 2010 Census and the latest ACS data (2013-2017 5-year samples);
- County assessor parcel databases;
- 2011 and 2015 Business Installment data from InfoGroup; and
- SCAG's 2016 RTP/SCS growth forecast.

On October 31, 2017, the preliminary small area (i.e. jurisdiction and sub-jurisdiction) growth forecasts were released to local jurisdictions for their comments and input. This kicked off SCAG's *Bottom-Up Local Input and Envisioning Process* which provided each local jurisdiction with their preliminary growth forecast information as well as several other data elements both produced by SCAG and other agencies which are related to the development of Connect SoCal. Data map books were generated and provided electronically and in hard copy format and included detailed parcel-level land use data, information on resource areas, farmland, transportation, geographical boundaries and the draft growth forecast. Complete information on the Data map books and the Bottom-Up Local Input and Envisioning Process can be found at <http://scagrtpscscs.net/Pages/DataMapBooks.aspx>. Over the next eight months, SCAG staff conducted one-on-one meetings with all 197 local jurisdictions to explain methods and assumptions behind the jurisdiction and sub-jurisdiction growth forecast as well as to provide an opportunity to review, edit, and approve SCAG's preliminary forecast for population, employment, and households for 2016, 2020, 2030, 2035, and 2045.

Between October 2018 and February 2019, SCAG reviewed local input on the growth forecast and other data map book elements. The local input growth forecast was evaluated at the county and regional level for the base year of 2016 and the horizon year of 2045 and was found to be technically sound. Specifically, as it relates to SCAG's local input household forecast:

- The forecast generates a 2045 regional unemployment rate of 4.7 percent which is reasonable based on past trends and ensured that the forecast is balanced, i.e. there are not too many jobs for the number of anticipated workers
- The forecast generates a 2045 population-to-household ratio of 2.9 which is consistent with the preliminary forecast and reflects expert-anticipated decreases in this ratio, ensuring that there are not too many people for the anticipated number of households region-wide
- From 2020-2045, the forecast anticipates household growth of 21 percent and population growth of 15 percent, indicating an alleviation of the region's current housing shortage over this future period.

SCAG's growth forecast for the years 2020-2030 is used as the basis for calculating projected housing unit need. Because the 6th cycle RHNA projection period covers July 1, 2021 through October 15, 2029, it is necessary to adjust reported household growth between 2020 and 2030 and adjust it to an 8.25 year projection period. The anticipated growth in households over this period is multiplied by 0.825 to approximate growth during the 8.25-year RHNA projection period (July 1, 2021 to October 15, 2029).

### Step 1b: Future Vacancy Need

The purpose of a future vacancy need is to ensure that there are enough vacant units to support a healthy housing market that can genuinely accommodate projected household growth. An undersupply of vacant units can prevent new households from forming or moving into a jurisdiction. Formulaically, future vacancy need is a percentage applied to the jurisdiction's household growth by tenure type (owner and renter households). While individual jurisdictions may experience different vacancy rates at different points in time, future vacancy need is independent of existing conditions and instead is a minimum need to support household growth.

To calculate a jurisdiction's future vacancy need, its proportion of owner-occupied units and renter-occupied units are determined using American Community Survey (ACS) 2013-2017 data—the most recent available at the time of the draft methodology's development. The percentages are applied to the jurisdiction's projected household growth from the previous step, which results in the number of projected households that are predicted to be owners and those that are predicted to be renters.

Next, two different vacancy rates are applied based on the regional determination provided by HCD. The recommended methodology uses 1.5 percent for owner-occupied units and a rate of 5 percent for renter-occupied units. The difference is due to the higher rates of turnover generally reported by renter units in comparison to owner-occupied units. The vacancy rates are applied to their respective tenure category to determine how many future vacant units are needed by tenure and then added together to get the total future vacancy need.

### Step 1c: Replacement Need

Residential units are demolished for a variety of reasons including natural disasters, fire, or desire to construct entirely new residences. Each time a unit is demolished, a household is displaced and disrupts the jurisdiction's pattern of projected household growth. The household may choose to live in a vacant unit or leave the jurisdiction, of which both scenarios result in negative household growth

through the loss of a vacant unit for a new household or subtracting from the jurisdictions number of households.

For these reasons, replacement need is a required component of the regional determination provided by HCD. The methodology's replacement need will be calculated using a jurisdiction's net replacement need based on data submitted for the replacement need survey, which was conducted between March and April 2019.

Each jurisdiction's data on historical demolitions between reporting years 2008 and 2018, which was collected from the California Department of Finance (DOF), was tabulated and provided to jurisdictions in the replacement need survey. Jurisdictions were asked to provide data on units that replaced the reported demolished units. A net replacement need was determined based on this information for each jurisdiction.

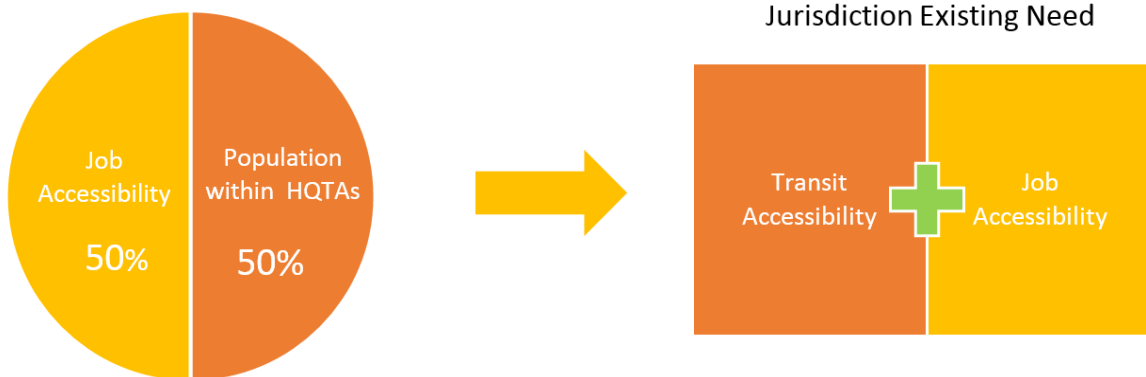
After determining each of the projected housing need components, they are combined to determine a jurisdiction's projected housing need.

### Step 2: Determine Existing Housing Need

After determining a jurisdiction's projected need, the next step is to determine a jurisdiction's existing need. Following the above discussion and based on HCD's determination of total regional housing need, existing need is defined as the total need minus the projected need—approximately 62 percent of the entire regional determination. SCAG's Regional Council determined that the regional existing need be split into two parts:

- Fifty (50) percent on population near transit (HQTAs), or 31 percent of total need
- Fifty (50) percent on job accessibility, or 31 percent of total need

Regional Existing Need



### Step 2a: Share of Regional HQTA Population

The next step involves the consideration of proximity to transit to distribute fifty (50) percent of the region's existing housing need, in an effort to better align transportation and housing planning.

For several years, SCAG has developed a measure called High Quality Transit Areas (HQTAs) which are areas within a half-mile of transit stations and corridors with at least a fifteen (15) minute headway during peak hours for bus service. HQTAs are based on state statutory definitions of high-quality transit corridors (HQTcs) and major transit stops. For the development of Connect SoCal, freeway-running HQTcs have been excluded from HQTAs to better reflect the level of service they provide to nearby areas.

Planned HQTcs and major transit stops for future years are improvements that are expected to be implemented by transit agencies by the Connect SoCal horizon year of 2045. SCAG updates its inventory with the quadrennial adoption of each RTP/SCS; however, planning and environmental impact studies may be completed by transit agencies more frequently. Therefore, HQTAs in future years reflect the best information currently available to SCAG regarding the location of future high-quality transit service accessibility. More detailed information on HQTA-related definitions is available in the data appendix.

50 percent of the regional existing housing need will be distributed based on a jurisdiction's share of regional residential population within an HQTA, based on the HQTA boundaries used in the final Connect SoCal Plan anticipated to be adopted by SCAG in April 2020. Not all jurisdictions have an HQTA within their jurisdictional boundaries and thus may not receive existing need based on this factor.

### Step 2b: Job Accessibility

The concept behind job accessibility is to further the statewide housing objective and SCAG's Connect SoCal objective of improving the relationship between jobs and housing. While none of the three options presented in the proposed RHNA methodology included a factor directly based on job accessibility, an overwhelming number of public comments expressed support for the methodology to include this specific component.

The methodology assigns fifty (50) percent of regional existing need based on job accessibility. Job accessibility is based on the share of the region's jobs accessible by a thirty (30) minute commute by car in 2045. Importantly, the RHNA methodology's job access factor is *not* based on the number of jobs within a jurisdiction from SCAG's Connect SoCal Plan or any other data source. Rather, it is a measure based on of how many jobs can be *accessed* from that jurisdiction within a 30-minute commute, which includes jobs in other jurisdictions. Since over 80 percent of SCAG region workers live and work in different jurisdictions, genuinely improving the relationship between jobs and housing necessitates an approach based on job access rather than the number of jobs in a jurisdiction.

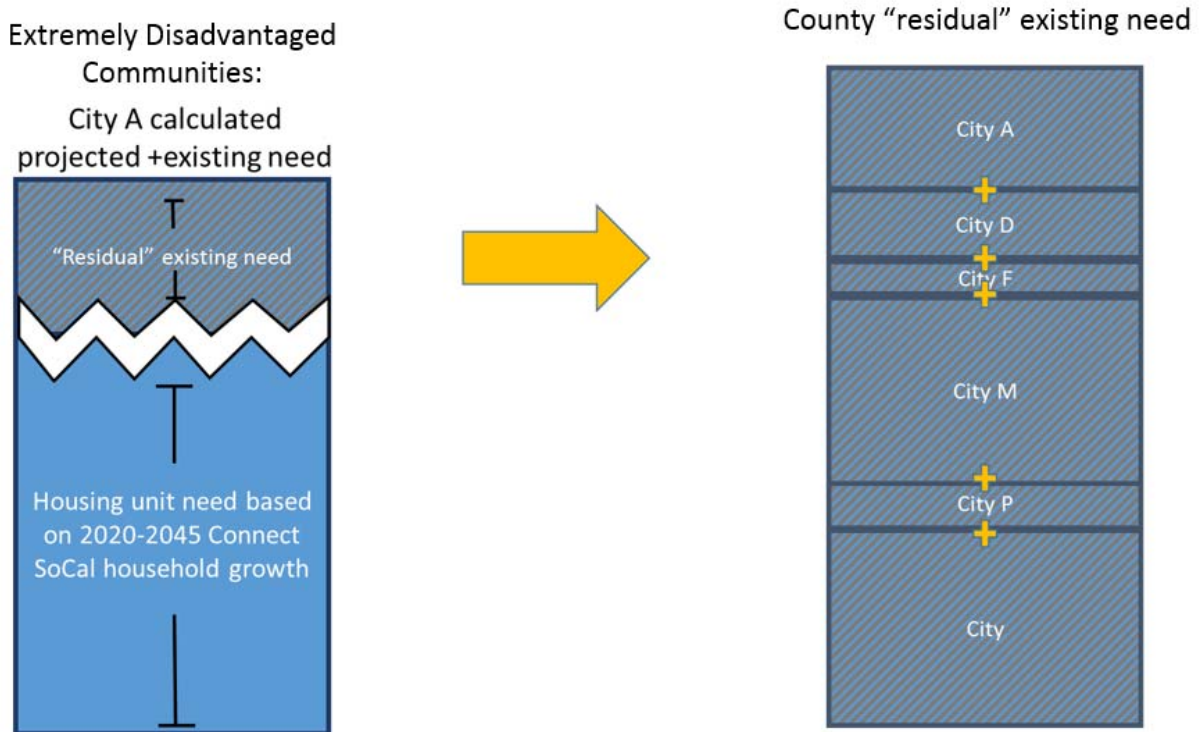
These job accessibility data are derived at the transportation analysis zone (TAZ) level from travel demand modelling output from SCAG's final Connect SoCal Plan. SCAG realizes that in many jurisdictions, especially larger ones, job access many not be uniform in all parts of the city or county. However, since the RHNA process requires allocating housing need at the jurisdictional-level, staff reviewed several ways to measure the typical commuter's experience in each jurisdiction. Ultimately, the share of the region's jobs that could be accessed by a jurisdiction's *median TAZ* was found to be the best available measure of job accessibility for that jurisdiction. Based on this measure, in central parts of the region, residents of some jurisdictions can access as much as 23 percent of the region's

jobs in a 30 minute car commute, while the average across all the region’s jurisdictions was 10.5 percent.

This measure is multiplied by a jurisdiction’s share of total population in order to allocate housing unit need to jurisdictions. This important step ensures that the potential beneficiaries of greater accessibility (i.e., the population in a jurisdiction with good job access) are captured in the methodology. Based on this approach, jurisdictions with limited accessibility to jobs will receive a smaller RHNA allocation based on this component.

**Step 2c: “Residual” Adjustment Factor for Existing Need**

In many jurisdictions defined as “disadvantaged communities (DACs)”, the calculated projected and existing need is higher than its household growth between 2020 and 2045, as determined by the SCAG Growth Forecast used in the final Connect SoCal regional plan. Those DAC jurisdictions that have a need as determined by the RHNA methodology as higher than its 2020 to 2045 household growth<sup>3</sup> will be considered as generating “residual” existing need. Residual need will be subtracted from jurisdictional need in these cases so that the maximum a DAC jurisdiction will receive for existing need is equivalent to its 2020 to 2045 household growth. Not all DAC jurisdictions will have a residual existing need.



<sup>3</sup> Since HCD’s regional determination of 1,341,827 exceeds SCAG’s 2020-2045 household growth forecast of 1,297,000 by 3.68 percent, for the purposes of existing need allocation, exceeding “local input” or “Connect SoCal” household growth shall mean exceeding 1.0368 times household growth.

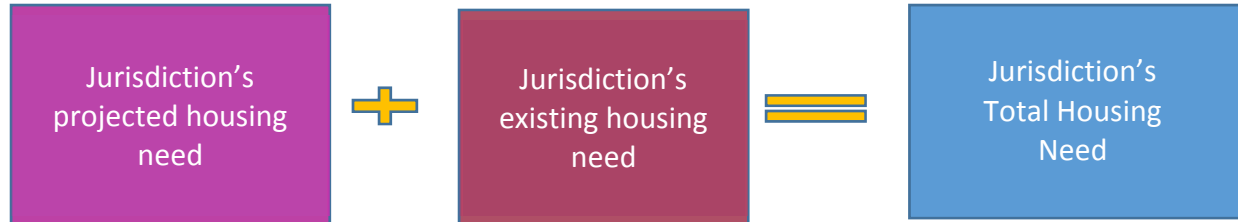
A county total of residual existing need will be calculated and then redistributed with the same county to non-DAC jurisdictions. The redistribution will be assigned to jurisdictions based on transit accessibility (50%) and job accessibility (50%), and will exclude DAC jurisdictions which have over 50% of their populations in very low resource areas using California Tax Credit Allocation Committee (TCAC)/HCD Opportunity Indices.

Very low resource areas are areas that have least access to opportunity as measured by indicators such as poverty levels, low wage job proximity, math and reading proficiency, and pollution levels. This mechanism will help to further AFFH objectives since residual existing RHNA need, which includes additional affordable units, will be assigned to areas that are not identified as those with the lowest resources, which will increase access to opportunity. A full discussion on the TCAC opportunity indicators is provided in the following section on social equity adjustment. Data relating to the TCAC opportunity indicator categories for each jurisdiction can be found in the RHNA methodology data appendix and in the accompanying RHNA allocation estimator tool on the RHNA webpage: [www.scag.ca.gov/rhna](http://www.scag.ca.gov/rhna).

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### Step 3: Determining Total Housing Need

After determining a jurisdiction's projected housing need from step 1 and its existing housing need from step 2, the sum of the projected and existing need becomes a jurisdiction's total housing need.



### Step 4: Determining Four Income Categories through Social Equity Adjustment

After determining a jurisdiction's total RHNA allocation, the next step is to assign the total into four RHNA income categories. The four RHNA income categories are:

- Very low (50 percent or less of the county median income);
- Low (50-80 percent);
- Moderate (80 to 120 percent); and
- Above moderate (120 percent and above)

The fourth RHNA objective specifically requires that the RHNA methodology allocate a lower proportion of housing need in jurisdictions that already have a disproportionately high concentration of those households in comparison to the county distribution. Additionally, the fifth objective, affirmatively furthering fair housing (AFFH), requires that the RHNA methodology further the objectives of addressing significant disparities in housing needs and access to opportunity in order to overcome patterns of segregation.

To further these two objectives, the RHNA methodology includes a minimum 150 percent social equity adjustment and an additional 10 to 30 percent added in areas with significant populations that are defined as very low or very high resource areas, referred to as an AFFH adjustment. This determines the distribution of four income categories for each jurisdiction.

#### Social equity adjustment



A social equity adjustment ensures that jurisdictions accommodate their fair share of each income category. First, the percentage of each jurisdiction’s distribution of four income categories is determined using the county median income as a benchmark. For example, in Los Angeles County, a household earning less than \$30,552 annually, or 50 percent of the county median income, would be considered a very low income household. A household in Los Angeles County earning more than \$73,218 annually, or 120 percent of the county median income, would be counted in the above moderate category. The number of households in each category is summed and then a percentage of each category is then calculated.

For reference, below is the median household income by county.

- Imperial County: \$44,779
- Los Angeles County: \$61,015
- Orange County: \$81,851
- Riverside County: \$60,807
- San Bernardino County: \$57,156
- Ventura County: \$81,972
- SCAG region: \$64,114

*Source: American Community Survey (ACS) 2013-2017 5-year estimates*

Once a jurisdiction’s household income distribution by category is determined, the percentage is compared to the county’s percentage of existing household income distribution. For example, if a jurisdiction has an existing distribution of 30 percent of very low income households while the county is 25 percent, the jurisdiction is considered as having an overconcentration of very low income households compared to the county. A social equity adjustment ensures that the jurisdiction will be assigned a smaller percentage of very low income households for its RHNA allocation than both what it and the county currently experience.

If the jurisdiction is assigned a social equity adjustment of 150 percent, the formula to calculate its very low income percentage is:

Household Income Level	Formula to Calculate City A Social Equity Adjustment of 150%
Very Low Income	$30\% - [(30\% - 25\%) \times 1.5] = 22.5\%$

In this example, 22.5 percent of the jurisdiction’s total RHNA allocation would be assigned to the very low income category. This adjustment is lower than both its existing household income distribution (30 percent) and the existing county distribution (25 percent).

The inverse occurs in higher income categories. Assuming 20 percent of a jurisdiction’s households are above moderate income while 25 percent of the county’s households are above moderate income, the jurisdiction will be assigned a distribution of 27.5 percent for above moderate income need.

Household Income Level	Formula to Calculate City A Social Equity Adjustment of 150%
Above moderate income	$20\% - [(20\% - 25\%) \times 1.5] = 27.5\%$



If the adjustment was 100 percent a jurisdiction’s distribution would be exactly the same as the County’s distribution. Conceptually a 150 percent adjustment means that the City meets the County distribution and goes beyond that threshold by 50 percent, resulting in a higher or lower distribution than the County depending on what existing conditions are in the City. The higher the adjustment, the more noticeable the difference between the jurisdiction’s existing household income distribution and its revised distribution.

The RHNA methodology recommends a minimum of 150 percent social equity adjustment with an additional 10, 20, or 30 percent added depending on whether the jurisdiction is considered a very low or very high resource area based on its Opportunity Index score.

In 2015 the U.S. Department of Housing and Urban Development (HUD) developed a set of “Opportunity Indices” to help states and localities identify factors that contribute to fair housing issues in their region and comply with the federal Fair Housing Act. In late 2017, a Task Force convened by HCD and the California Tax Credit Allocation Committee (TCAC) released an “Opportunity mapping” tool based on these HUD indices to identify areas in California that can “offer low-income children and adults the best chance at economic advancement, high educational attainment, and good physical and mental health.”<sup>4</sup>

The TCAC and HCD Opportunity mapping tool includes a total of eleven (11) census-tract level indices to measure exposure to opportunity in local communities. The indices are based on measures of economic, environmental, and educational opportunities within communities. Regional patterns of segregation are also identified based on this tool. Below is a summary table of the 11 indices sorted by type:

<b>Economic</b>	<b>Environment</b>	<b>Education</b>
Poverty	CalEnviroScreen 3.0 indicators	Math proficiency
Adult education		Reading proficiency
Employment		High school graduation rates
Low-wage job proximity		Student poverty rate
Median home value		<ul style="list-style-type: none"> <li>• <i>Ozone</i></li> <li>• <i>PM2.5</i></li> <li>• <i>Diesel PM</i></li> <li>• <i>Drinking water contaminates</i></li> <li>• <i>Pesticides</i></li> <li>• <i>Toxic releases from facilities</i></li> <li>• <i>Traffic density</i></li> <li>• <i>Cleanup sites</i></li> <li>• <i>Groundwater threats</i></li> <li>• <i>Hazardous waste</i></li> <li>• <i>Impaired water bodies</i></li> <li>• <i>Solid waste sites</i></li> </ul>

<sup>4</sup> California Fair Housing Taskforce Revised opportunity Mapping Technology, Updated November 27, 2018: <https://www.treasurer.ca.gov/ctcac/opportunity/final-opportunity-mapping-methodology.pdf>

Based on its respective access to opportunity, each census tract is given a score that designates it under one of the following categories:

- High segregation & poverty
- Low resource
- Moderate resource
- High resource
- Highest resource

Tract-level indices were summed to the jurisdictional-level by SCAG using area-weighted interpolation. Using 2013-2017 American Community Survey population data, SCAG determined the share of each jurisdiction’s population in each of these five categories. For example:

	Lowest Resource				Very High Resource
Opportunity Indicator Category	High segregation & poverty	Low resource	Moderate resource	High resource	Highest resource
City A Percentage of population	10%	10%	30%	30%	20%
City B Percentage of population	90%	5%	5%	0%	0%
City C Percentage of population	0%	0%	10%	15%	75%

The recommended methodology determines high resource concentration using the “very high” resource area score. The recommended methodology determines “lowest” resource areas by combining the two lowest measures. In the above table, City B would be considered to have a much higher concentration of lower resource areas than City A. City C would be considered to have a much higher concentration of highest resource areas.<sup>5</sup>

- High segregation & Poverty + Low Resource = Lowest Resource
- Highest Resource

Jurisdictions that are identified as having between 70 and 100 percent of the population within a lowest or very high resource area are assigned an additional 10 and 30 percent social equity adjustment:

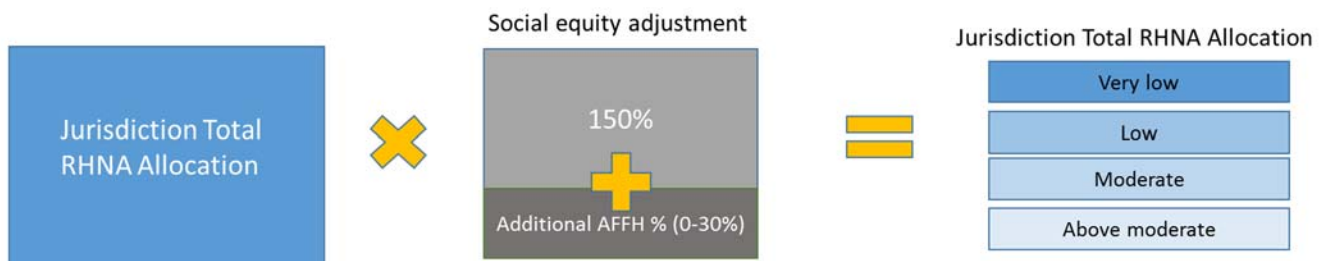
<sup>5</sup> As a cross-reference, if City B has both a high job and transit accessibility it would be exempt from the redistribution of residual existing need from the RHNA methodology’s Step 2d because more than 50 percent of its population is within a very low resource area. On the other hand City A and City C, if they have a high job and transit access, would not be exempt from receiving regional residual need because they have only 20 percent and 0 percent of their respective population within a very low resource area.

Concentration of population within very low or very high resource area	Additional social equity adjustment
70-80%	+10%
80-90%	+20%
90-100%	+30%

In the example table, City B would receive an additional social equity adjustment of 30% because 95% of its population is within a lowest resource area (sum of high segregation & poverty and low resource measures). City C would receive an additional social equity adjustment of 10% because 75% of its population is within a very high resource area. City A would not receive a further adjustment because it does not have a high enough concentration of population within either the lowest or very high resource categories.

Assigning a higher social equity adjustment based on Opportunity Indices will result in a higher percentage of affordable housing units to areas that have higher resources. Concurrently, it will assign a lower percentage of affordable housing in areas where they is already an overconcentration. Because Opportunity Indices consider factors such as access to lower wage jobs, poverty rates, and school proficiency, the social equity adjustment in the RHNA methodology will result in factors beyond simply household income distribution. This additional adjustment will help to adjust the disparity in access to fair housing across the region, furthering the AFFH objective required in State housing law.

Once the social equity adjustment is determined, it is used to assign need to the four income categories.



### Final Adjustments

On a regional level the final RHNA allocation plan must be the same as the regional determination, by income category, provided by HCD. The final RHNA methodology will result in slight differences, among income categories, since income categories are required to use county distributions as benchmarks and the HCD determination does not include county-level benchmarks. For this reason, after the initial income categories are determined for jurisdictions, SCAG will apply a normalization adjustment to the RHNA allocation to ensure that the regional total by income category is maintained.

Additionally, in the event that a jurisdiction receives an allocation of zero (0) units under the RHNA methodology a minimum RHNA allocation of eight (8) units would be assigned. Government Code Section 65584.04(m)(2) requires that the final RHNA allocation plan ensure that each jurisdiction receive an allocation of units for low- and very low income households. Under these circumstances, SCAG will assign those jurisdictions a minimum of four (4) units in the very low income category and four (4) units in the low income category for a draft RHNA allocation of eight (8) units.

## Meeting the Objectives of RHNA

Government Code Section 65584.04(a) requires that the RHNA methodology furthers the five objectives of the Regional Housing Needs Assessment:

- (1) Increasing the housing supply and the mix of housing types, tenure, and affordability in all cities and counties within the region in an equitable manner, which shall result in each jurisdiction receiving an allocation of units for low- and very low income households.
- (2) Promoting infill development and socioeconomic equity, the protection of environmental and agricultural resources, the encouragement of efficient development patterns, and the achievement of the region's greenhouse gas reductions targets provided by the State Air Resources Board pursuant to Section 65080.
- (3) Promoting an improved intraregional relationship between jobs and housing, including an improved balance between the number of low-wage jobs and the number of housing units affordable to low-wage workers in each jurisdiction.
- (4) Allocating a lower proportion of housing need to an income category when a jurisdiction already has a disproportionately high share of households in that income category, as compared to the countywide distribution of households in that category from the most recent American Community Survey.
- (5) Affirmatively furthering fair housing.
  - (e) For purposes of this section, "affirmatively furthering fair housing" means taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics. Specifically, affirmatively furthering fair housing means taking meaningful actions that, taken together, address significant disparities in housing needs and in access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws.

On January 13, 2020, HCD completed its review of SCAG's draft RHNA methodology and found that it furthers the five statutory objectives of RHNA.

## Local Planning Factors

As part of the development of the proposed RHNA methodology, SCAG must conduct a survey of planning factors that identify local conditions and explain how each of the listed factors are incorporated into the RHNA methodology. This survey, also known as the “Local Planning Factor” survey, is a specific requirement for the RHNA methodology process and is separate from the local review process of the Growth Forecast used as the basis for determining future growth in the Connect SoCal plan.

The survey was distributed to all SCAG jurisdictions in mid-March 2019 with a posted due date of May 30, 2019. One-hundred and nine (109) jurisdictions, or approximately 55%, submitted a response to the local planning factor survey. To facilitate the conversation about local planning factors, between October 2017 and October 2018 SCAG included these factors as part of the local input survey and surveyed a binary yes/no as to whether these factors impacted jurisdictions. The formal local planning factor survey was pre-populated with the pre-survey answers to help facilitate survey response. The full packet of local planning factor surveys can be downloaded at [www.scag.ca.gov/rhna](http://www.scag.ca.gov/rhna).

SCAG staff reviewed each of the submitted surveys to analyze planning factors opportunities and constraints across the region. The collected information was used to ensure that the methodology will equitably distribute housing need and that underlying challenges as a region are collectively addressed.

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

The RHNA methodology directly considers job accessibility and determines a portion of housing need for each jurisdiction based on this factor. Using transportation analysis zones as a basis, the percentage of jobs accessible within a 30 minute drive for a jurisdiction’s population is determined and then weighted based on the jurisdiction’s population size to determine individual shares of regional jobs accessible. Based on a review of other potential mechanisms to factor in jobs into the RHNA methodology, SCAG staff has determined that this mechanism most closely aligns with the goals of State housing law.

A supplemental analysis of the impact of the draft RHNA methodology’s impact on jobs-housing relationships and low-wage jobs-housing relationships was provided to the Regional Council on February 5, 2020.

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

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

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

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

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

Consideration of the above planning factors have been incorporated into the Growth Forecast process and results by way of analysis of aerial land use data, general plan, parcel level property data, open space, agricultural land and resource areas, and forecast surveys distributed to local jurisdictions. The bottom-up Local Input and Envisioning Process, which is used as the basis for both RHNA and SCAG's Connect SoCal (Regional Transportation Plan/Sustainable Communities Strategy) started with an extensive outreach effort involving all local jurisdictions regarding their land use and development constraints. All local jurisdictions were invited to provide SCAG their respective growth perspective and input. The RHNA methodology directly incorporates local input on projected household growth, which should be a direct reflection of local planning factors such as lack of water or sewer capacity, FEMA-designated flood sites, and open space and agricultural land protection.

Prior RHNA cycles did not promote direct linkage to transit proximity and the methodology encourages more efficient land use patterns by utilizing existing as well as future planned transportation infrastructure and preserves areas designated as open space and agricultural

lands. In particular the inclusion of transit proximity places an increased emphasis on infill opportunities and areas that are more likely to support higher residential densities.

- (3) The distribution of household growth assumed for purposes of a comparable period of regional transportation plans and opportunities to maximize the use of public transportation and existing transportation infrastructure.*

As indicated above, the Growth Forecast used as the basis for the Connect SoCal Plan is also used as the basis for projected household growth in the RHNA methodology. The weighting of a jurisdiction's population share within an HQTAs directly maximizes the use of public transportation and existing transportation infrastructure.

- (4) Agreements between a county and cities in a county to direct growth toward incorporated areas of the county, and land within an unincorporated area zoned or designated for agricultural protection or preservation that is subject to a local ballot measure that was approved by the voters of the jurisdiction that prohibits or restricts conversion to nonagricultural uses.*

This planning factor has been identified through the local input process and local planning factor survey collection as affecting growth within Ventura County. The urban growth boundary, known as Save Our Agricultural Resources (SOAR), is an agreement between the County of Ventura and its incorporated cities to direct growth toward incorporated areas, and was recently extended to 2050. Based on the input collected, SCAG staff has concluded that this factor is already reflected in the RHNA methodology since it was considered and incorporated into the local input submitted by jurisdictions.

- (5) The loss of units contained in assisted housing developments, as defined in paragraph (9) of subdivision (a) of Section 65583 that changed to non-low-income use through mortgage prepayment, subsidy contract expirations, or termination of use restrictions.*

The conversion of low income units into non-low income units is not explicitly addressed through the distribution of existing and projected housing need. Staff has provided statistics in the RHNA methodology appendix on the potential loss of units in assisted housing developments. The loss of such units affects the proportion of affordable housing needed within a community and the region as a whole.

Local planning factor survey responses indicate that the impact of this factor is not regionally uniform. Many jurisdictions that replied some units are at-risk for losing their affordability status in the near future have indicated that they are currently reviewing and developing local resources to address the potential loss. Based on this, SCAG staff has determined that at-risk units are best addressed through providing data on these units as part of the RHNA methodology and giving local jurisdictions the discretion to address this factor and adequately plan for any at-risk unit loss in preparing their housing elements.



*(6) The percentage of existing households at each of the income levels listed in subdivision (e) of Section 65584 that are paying more than 30 percent and more than 50 percent of their income in rent.*

An evaluation of survey responses reveals that cost-burdened households, or those who pay at least 30 percent of their household income on housing costs, is a prevalent problem throughout the region. The RHNA methodology also includes in its appendix data from the ACS 2013-2017 on cost-burdened statistics for households who pay more than 30 percent of their income on housing by owner and renter, and for renter households who pay 50 percent or more of their income on housing. The general trend is seen in both high and low income communities, suggesting that in most of the SCAG region high housing costs are a problem for all income levels.

Nonetheless a large number of jurisdictions indicated in the survey that overpaying for housing costs disproportionately impacts lower income households in comparison to higher income households. This issue is exacerbated in areas where there is not enough affordable housing available, particularly in higher income areas. For this reason, the RHNA methodology incorporates not only a 150 percent social equity adjustment, but also uses the TCAC Opportunity Indices to distribute the RHNA allocation into the four income categories in areas identified as being the highest resource areas of the region. The Opportunity Indices include a proximity to jobs indicator, particularly for low-wage jobs, which identifies areas with a high geographical mismatch between low wage jobs and affordable housing. Increasing affordable housing supply in these areas can help alleviate cost-burden experienced by local lower income households because more affordable options will be available.

The reason for using social equity adjustment and opportunity indices to address cost-burden households rather than assigning total need is because it is impossible to determine through the methodology how and why the cost-burden is occurring in a particular jurisdiction. Cost-burden is a symptom of housing need and not its cause. A jurisdiction might permit a high number of units but still experiences cost-burden because other jurisdictions restrict residential permitting. Or, a jurisdiction might have a large number of owner-occupied housing units that command premium pricing, causing cost-burden for high income households and especially on lower income households due to high rents from high land costs. An analysis of existing need indicators by jurisdiction, which is part of the RHNA methodology data appendix, does not reveal a single strong trend to base a distribution methodology for cost-burden and thus the RHNA methodology distributes this existing need indicator regionally using social equity adjustment and Opportunity Indices rather than to where the indicators exist.

*(7) The rate of overcrowding.*

An evaluation of survey responses indicates that there is a variety of trends in overcrowding throughout the region. Overcrowding is defined as more than 1.01 persons per room (not bedroom) in a housing unit. Some jurisdictions have responded that overcrowding is a severe issue, particularly for lower income and/or renter households, while others have

responded that overcrowding is not an issue at all. At the regional determination level HCD applied an overcrowding component, which is a new requirement for the 6<sup>th</sup> RHNA cycle. Because

Similar to cost-burden, overcrowding is caused by an accumulated housing supply deficit and is considered an indicator of existing housing need. The reason for not assigning need directly based on this indicator is because it is impossible to determine through the methodology how and why the overcrowding is occurring in a particular jurisdiction. A jurisdiction that has an overcrowding rate higher than the regional average might be issuing more residential permits than the regional average while the surrounding jurisdictions might not have overcrowding issues but issue fewer permits than the regional average. An analysis of existing need indicators by jurisdiction, which is part of the RHNA methodology data appendix, does not reveal a single strong trend to base a distribution methodology for overcrowding and thus the methodology distributes this existing need indicator regionally rather than to where the indicators exist.

While not specifically surveyed, several jurisdictions have indicated that density has affected their jurisdictions and have requested that the methodology should consider this as a factor. While density is not directly addressed as a factor, the social equity adjustment indirectly addresses density particularly for lower income jurisdictions. In housing elements, jurisdictions most demonstrate that a site is affordable for lower income households by applying a “default density”, defined in State housing law as either 20 or 30 dwelling units per acre depending on geography and population. In other words, a site that is zoned at 30 dwelling units per acre is automatically considered as meeting the zoning need for a low income household.

However there is not a corresponding default density for above moderate income zoning. Assigning a lower percentage of lower income households than existing conditions indirectly reduces future density since the jurisdiction can zone at lower densities if it so chooses. While this result does not apply to higher income jurisdictions, directing growth toward less dense areas for the explicit purpose of reducing density is in direct contradiction to the objectives of state housing law, especially for promoting infill development and socioeconomic equity, the protection of environmental and agricultural resources, the encouragement of efficient development pattern.

*(8)The housing needs of farmworkers.*

The RHNA methodology appendix provides data on agricultural jobs by jurisdiction as well as workers by place of residence. The survey responses indicate that most jurisdictions do not have agricultural land or only have small agricultural operations that do not necessarily require designated farmworker housing. For the geographically concentrated areas that do have farmworker housing, responses indicate that many jurisdictions already permit or are working to allow farmworker housing by-right in the same manner as other agricultural uses are allowed. Jurisdictions that are affected by the housing needs of farmworkers can be assumed to have considered this local factor when submitting feedback on SCAG’s Growth

Forecast. A number of jurisdictions reiterated their approach in the local planning factor survey response.

Similar to at-risk units, the RHNA methodology does not include a distribution mechanism to distribute farmworker housing. However, SCAG has provided data in its RHNA methodology appendix related to this factor and encourages local jurisdictions to adequately plan for this need in their housing elements.

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

SCAG staff has prepared a map outlining the location of four-year private and public universities in the SCAG region along with enrollment numbers from the California School Campus Database (2018). Based on an evaluation of survey responses that indicated a presence of a university within their boundaries, SCAG staff concludes that most housing needs related to university enrollment are addressed and met by dormitories provided by the institution both on- and off-campus. No jurisdiction expressed concern in the surveys about student housing needs due to the presence of a university within their jurisdiction.

However, some jurisdictions have indicated outside of the survey that off-campus student housing is an important issue within their jurisdictions and are in dialogue with HCD to determine how this type of housing can be integrated into their local housing elements. Because this circumstance applies to only a handful of jurisdictions, it is recommended that housing needs generated by a public or private university be addressed in the jurisdiction's housing element if it is applicable.

*(10) The loss of units during a state of emergency that was declared by the Governor pursuant to the California Emergency Services Act (Chapter 7 (commencing with Section 8550) of Division 1 of Title 2), during the planning period immediately preceding the relevant revision pursuant to Section 65588 that have yet to be rebuilt or replaced at the time of the analysis.*

Replacement need, defined as units that have been demolished but not yet replaced, are included as a component of projected housing need in the RHNA methodology. To determine this number, HCD reviewed historical demolition permit data between 2008 and 2017 (reporting years 2009 and 2018) as reported by the California Department of Finance (DOF), and assigned SCAG a regional replacement need of 0.5% of projected and existing need, or 34,010 units.

There have been several states of emergency declared for fires in the SCAG region that have destroyed residential units, as indicated by several jurisdictions in their local planning factor survey responses. Survey responses indicate that a total of 1,785 units have been lost regionally from fires occurring after January 1, 2018. Units lost from fires that occurred prior to January 1, 2018, have already been counted in the replacement need for the 6<sup>th</sup> RHNA cycle.

In spring 2019, SCAG conducted a replacement need survey with jurisdictions to determine units that have been replaced on the site of demolished units reported. Region wide 23,545 of the region's demolished units still needed to be replaced based on survey results. The sum of the number of units needing to be replaced based on the replacement need survey and the number of units reported as lost due to recent states of emergency, or 25,330, is lower than HCD's regional determination of replacement need of 34,010. One can reasonably conclude that units lost based on this planning factor are already included in the regional total and distributed, and thus an extra mechanism to distribute RHNA based on this factor is not necessary to meet the loss of units.

*(11)The region's greenhouse gas emissions targets provided by the State Air Resources Board pursuant to Section 65080.*

An assessment of survey responses indicate that a number of jurisdictions in the SCAG region are developing efforts for more efficient land use patterns and zoning that would result in greenhouse gas emissions. These include a mix of high-density housing types, neighborhood based mixed-use zoning, climate action plans, and other local efforts to reduce greenhouse gas emissions at the regional level.

The RHNA methodology includes a distribution of 50 percent of regional existing need based on a jurisdiction's share of regional population within an HQT. The linkage between housing planning and transportation planning will allow for a better alignment between the RHNA allocation plan and the Connect SoCal RTP/SCS. It will promote more efficient development land use patterns, encourage transit use, and importantly reduce greenhouse gas emissions. This will in turn support local efforts already underway to support the reduction of regional greenhouse gas emissions.

Moreover the RHNA methodology includes the Growth Forecast reviewed with local input as a distribution component, particularly for projected housing need. Local input is a basis for SCAG's Connect SoCal Plan, which addresses greenhouse gas emissions at the regional level since it is used to reach the State Air Resources Board regional targets. An analysis of the consistency between the RHNA and Connect SoCal Plan is included as an attachment to this document.

*(12)Any other factors adopted by the council of governments that further the objectives listed in subdivision (d) of Section 65584, provided that the council of governments specifies which of the objectives each additional factor is necessary to further. The council of governments may include additional factors unrelated to furthering the objectives listed in subdivision (d) of Section 65584 so long as the additional factors do not undermine the objectives listed in subdivision (d) of Section 65584 and are applied equally across all household income levels as described in subdivision (f) of Section 65584 and the council of governments makes a finding that the factor is necessary to address significant health and safety conditions.*

No other planning factors were adopted by SCAG to review as a specific local planning factor.

## **Affirmatively Furthering Fair Housing (AFFH)**

Among a number of changes due to recent RHNA legislation is the inclusion of affirmatively furthering fair housing (AFFH) as both an addition to the listed State housing objectives of Government Section 65588 and to the requirements of RHNA methodology as listed in Government Code Section 65584.04(b) and (c), which includes surveying jurisdictions on AFFH issues and strategies and developing a regional analysis of findings from the survey.

### AFFH Survey

The AFFH survey accompanied the required local planning factor survey and was sent to all SCAG jurisdictions in mid-March 2019 with a posted due date of May 30, 2019. Ninety (90) of SCAG's 197 jurisdictions completed the AFFH survey, though some jurisdictions indicated that they would not be submitting the AFFH survey due to various reasons. The full packet of surveys submitted prior to the development of the proposed methodology packet can be downloaded at [www.scag.ca.gov/rhna](http://www.scag.ca.gov/rhna).

Jurisdictions were asked various questions regarding fair housing issues, strategies and actions. These questions included:

- Describe demographic trends and patterns in your jurisdiction over the past ten years. Do any groups experience disproportionate housing needs?
- To what extent do the following factors impact your jurisdiction by contributing to segregated housing patterns or racially or ethnically-concentrated areas of poverty?
- To what extent do the following acts as determinants for fair housing and compliance issues in your jurisdiction?
- What are your public outreach strategies to reach disadvantaged communities?
- What steps has your jurisdiction undertaken to overcome historical patterns of segregation or remove barriers to equal housing opportunity?

The survey questions were based on the U.S. Department of Housing and Urban Development (HUD) Analysis of Impediments to Fair Housing Choice survey that each jurisdiction, or their designated local Housing Authority, must submit to HUD to receive Community Development Block Grant (CDBG) funds. For the AFFH survey, jurisdictions were encouraged to review their HUD-submitted surveys to obtain data and information that would be useful for submitting the AFFH survey.

Pursuant to Government Code Section 65584.04(c), the following is an analysis of the survey results.

### *Themes*

Several demographic themes emerged throughout the SCAG region based on submitted AFFH surveys. A high number of jurisdictions indicated that their senior populations are increasing and many indicated that the fixed income typically associated with senior populations might have an effect on housing affordability. Other jurisdictions have experienced an increase in minority populations, especially among Latino and Asian groups. There is also a trend of the loss of young adults (typically younger than 30) and a decrease in the number of families with children in more suburban locations due to the rise in housing costs.

### *Barriers*

There was a wide variety of barriers reported in the AFFH survey, though a number of jurisdictions indicated they did not have any reportable barriers to fair access to housing. Throughout the SCAG region, communities of all types reported that community opposition to all types of housing was an impediment to housing development. Sometimes the opposition occurred in existing low income and minority areas. Some jurisdictions indicated that high opportunity resource areas currently do not have a lot of affordable housing or Section 8 voucher units while at the same time, these areas have a fundamental misunderstanding of who affordable housing serves and what affordable housing buildings actually look like. Based on these responses, it appears that community opposition to housing, especially affordable housing and the associated stigma with affordable housing, is a prevalent barrier throughout the SCAG region.

Other barriers to access to fair housing are caused by high land and development costs since they contribute to very few affordable housing projects being proposed in higher opportunity areas. The high cost of housing also limits access to fair housing and is a significant contributing factor to disparities in access to opportunity. Increasing property values were reported across the region and some jurisdictions indicated that they are occurring in existing affordable neighborhoods and can contribute to gentrification and displacement. Additionally, during the economic downturn a large number of Black and Latino homeowners were disproportionately impacted by predatory lending practices and therefore entered foreclosure in higher numbers than other populations.

Other barriers reported in the AFFH survey include the lack of funding available to develop housing after the dissolution of redevelopment agencies in 2012. Moreover, some jurisdictions indicated that the lack of regional cooperation contributes to segregation.

### *Strategies to Overcome Barriers*

All submitted AFFH surveys indicated that their respective jurisdictions employed at least a few strategies to overcome barriers to access fair housing. These strategies ranged from local planning and zoning tools to funding assistance to innovative outreach strategies.

In regard to planning and zoning tools, a number of jurisdictions indicated they have adopted inclusionary zoning ordinances or an in-lieu fee to increase the number of affordable units within their jurisdictions. Others have adopted an accessory dwelling unit (ADU) ordinance with accommodating standards to allow for higher densities in existing single-family zone neighborhoods. A few jurisdictions indicated that they have adopted an unpermitted dwelling unit (UDU) ordinance, which legalizes unpermitted units instead of removing them provided that the units meet health and safety codes. In addition to ADU and UDU ordinances, some jurisdictions have also adopted density bonuses, which allow a project to exceed existing density standards if it meets certain affordability requirements. Some responses in the survey indicate that the establishment of some of these tools and standards have reduced community opposition to projects. In addition, some jurisdictions responded that they have reduced review times for residential permit approvals and reduced or waived fees associated with affordable housing development.

To combat gentrification and displacement, some jurisdictions have established rent-stabilization ordinances while others have established a rent registry so that the jurisdiction can monitor rents

and landlord practices. Some jurisdictions have adopted relocation plans and others are actively seeking to extend affordability covenants for those that are expiring.

In regard to funding, SCAG jurisdictions provide a wide variety of support to increase the supply of affordable housing and increase access to fair housing. A number of jurisdictions provide citywide rental assistance programs for low income households and some indicated that their programs include favorable home purchasing options. Some of these programs also encourage developers to utilize the local first-time homebuyer assistance program to specifically qualify lower income applicants.

Other jurisdictions indicate that they manage housing improvement programs to ensure that their existing affordable housing stock is well maintained. Some AFFH surveys describe local multiple rental assistance programs, including Section 8 Housing Choice vouchers and financial support of tenant/landlord arbitration or mediation services.

Some jurisdictions indicated that they have focused on mobile homes as a way to increase access to fair housing. There are programs described that assist households that live in dilapidated and unsafe mobile homes in unpermitted mobile home parks by allowing the household to trade in their mobile home in exchange for a new one in a permitted mobile park. Other programs include rental assistance specifically for households who live in mobile homes.

In regard to community outreach, a large number of jurisdictions in the SCAG region have established or are seeking to establish innovative partnerships to increase access to fair housing and reduce existing barriers. Many jurisdictions work with fair housing advocacy groups such as the Housing Rights Center, which provide community workshops, counseling, and tenant-landlord mediation services. Other jurisdictions have established landlord-tenant commissions to resolve housing disputes and provide services to individuals with limited resources. Some jurisdictions have partnered with advocacy groups, such as the League of United Latin American Citizens (LULAC), to hold community-based workshops featuring simultaneous multi-lingual translations. Other innovative partnerships created by jurisdictions include those with local schools and school districts and public health institutions to engage disadvantaged groups and provide services to areas with limited resources.

A large number of jurisdictions have also indicated that they have increased their social media presence to reach more communities. Others have also increased their multi-lingual outreach efforts to ensure that limited-English proficiency populations have the opportunity to engage in local fair housing efforts.

Based on the AFFH surveys submitted by jurisdictions, while there is a wide range of barriers to fair housing opportunities in the SCAG region there is also a wide range of strategies to help overcome these barriers at the local level.

Meeting AFFH Objectives on a Regional Basis

To work towards the objective of AFFH, several benchmarks were reviewed as potential indicators of increasing access to fair housing and removing barriers that led to historical segregation patterns.

*Opportunity Indices*

The objectives of affirmatively furthering fair housing are to not only overcome patterns of segregation, but to also increase access to opportunity for historically marginalized groups, particularly in racially and ethnically concentrated areas of poverty. In 2015 the U.S. Department of Housing and Urban Development (HUD) developed a set of indices, known as “Opportunity Indices” to help states and jurisdictions identify factors that contribute to fair housing issues in their region and comply with the federal Fair Housing Act.

In 2015 the U.S. Department of Housing and Urban Development (HUD) developed a set of indices, known as “Opportunity Indices” to help states and jurisdictions identify factors that contribute to fair housing issues in their region and comply with the federal Fair Housing Act. In late 2017, a Task Force convened by HCD and the California Tax Credit Allocation Committee (TCAC) released an “Opportunity mapping” tool based on these HUD indices to identify areas in California that can “offer low-income children and adults the best chance at economic advancement, high educational attainment, and good physical and mental health.”

The TCAC and HCD Opportunity mapping tool includes a total of eleven (11) census-tract level indices to measure exposure to opportunity in local communities. Regional patterns of segregation can be identified based on this tool. The indices are based on indicators such as poverty levels, low wage job proximity, pollution, math and reading proficiency. Below is a summary table of the 11 indices sorted by type:

<b>Economic</b>	<b>Environment</b>	<b>Education</b>
Poverty	CalEnviroScreen 3.0 indicators	Math proficiency
Adult education		Reading proficiency
Employment		High school graduation rates
Low-wage job proximity		Student poverty rate
Median home value		<ul style="list-style-type: none"> <li>• <i>Ozone</i></li> <li>• <i>PM2.5</i></li> <li>• <i>Diesel PM</i></li> <li>• <i>Drinking water contaminates</i></li> <li>• <i>Pesticides</i></li> <li>• <i>Toxic releases from facilities</i></li> <li>• <i>Traffic density</i></li> <li>• <i>Cleanup sites</i></li> <li>• <i>Groundwater threats</i></li> <li>• <i>Hazardous waste</i></li> <li>• <i>Impaired water bodies</i></li> <li>• <i>Solid waste sites</i></li> </ul>

To further the objectives of AFFH, SCAG utilizes the Opportunity indices tool at multiple points in the RHNA methodology. Jurisdictions that have the highest concentration of population in low resource areas are exempted from receiving regional residual existing need, which will result in fewer units



assigned to areas identified as having high rates of poverty and racial segregation. Additionally, jurisdictions with the highest concentration of population within highest resource areas will receive a higher social equity adjustment, which will result in more access to opportunity for lower income households.

## **Public Engagement**

The development of a comprehensive RHNA methodology requires comprehensive public engagement. Government Code Section 65584.04(d) requires at least one public hearing to receive oral and written comments on the proposed methodology, and also requires SCAG to distribute the proposed methodology to all jurisdictions and requesting stakeholders, along with publishing the proposed methodology on the SCAG website. The official public comment period on the proposed RHNA methodology began on August 1, 2019 after Regional Council action and concluded on September 13, 2019.

To maximize public engagement opportunities, SCAG staff hosted four public workshops to receive verbal and written comment on the proposed RHNA methodology and an additional public information session in August 2019:

- August 15, 6-8 p.m. Public Workshop, Los Angeles (View-only webcasting available)
- August 20, 1-3 p.m. Public Workshop, Los Angeles (Videoconference at SCAG regional offices and View-only webcasting available)
- August 22, 1-3 p.m., Public Workshop, Irvine
- August 27, 6-8 p.m., Public Workshop, San Bernardino (View-only webcasting available)
- August 29, 1-3pm Public Information Session, Santa Clarita

Approximately 250 people attended the workshops in-person, at videoconference locations, or via webcast. Over 35 individual verbal comments were shared over the four workshops.

To increase participation from individuals and stakeholders that are unable to participate during regular working hours, two of the public workshops were held in the evening hours. One of the workshops was held in the Inland Empire. SCAG worked with its Environmental Justice Working Group (EJWG) and local stakeholder groups to reach out to their respective contacts in order to maximize outreach to groups representing low income, minority, and other traditionally disadvantaged populations.

Almost 250 written comments were submitted by the comment deadline and included a wide range of stakeholders. Approximately 50 percent were from local jurisdictions and subregions, and the other 50 percent were submitted by advocacy organizations, industry groups, residents and resident groups, and the general public. All of the comments received, both verbal and written, were reviewed by SCAG staff, and were used as the basis for developing the RHNA methodology.

The increased involvement by the number of jurisdictions and stakeholders beyond the municipal level compared to prior RHNA cycles indicate an increased level of interest by the public in the housing crisis and its solutions, and the efforts of SCAG to meet these interests. As part of its housing

program initiatives, SCAG will continue to reach out to not only jurisdictions, but to advocacy groups and traditionally disadvantaged communities that have not historically participated in the RHNA process and regional housing planning. These efforts will be expanded beyond the RHNA program and will be encompassed into addressing the housing crisis at the regional level and ensuring that those at the local and community level can be part of solutions to the housing crisis.

### **Additional RHNA Methodology Supporting Materials**

Please note that additional supporting materials for the RHNA Methodology have been posted on SCAG's RHNA website at [www.scag.ca.gov/rhna](http://www.scag.ca.gov/rhna) including Data Appendix, Local Planning Factor Survey Responses and Affirmatively Furthering Fair Housing Survey Responses.

**ESTIMATE OF SCAG RHNA ALLOCATION BASED ON STAFF-RECOMMENDED FINAL RHNA METHODOLOGY**  
 13-Feb-20

**ALLOCATION BY COUNTY**

	Total	Very-low income	Low income	Moderate income	Above moderate income
Imperial	15,953	4,652	2,349	2,192	6,760
Los Angeles	813,071	217,492	123,141	131,523	340,916
Orange	183,425	46,264	29,166	32,476	75,519
Riverside	167,191	41,922	26,443	29,146	69,681
San Bernardino	137,796	35,556	21,849	24,089	56,302
Ventura	24,398	5,751	3,799	4,516	10,332
<b>TOTAL</b>	<b>1,341,834</b>	<b>351,637</b>	<b>206,747</b>	<b>223,941</b>	<b>559,509</b>

**ALLOCATION BY SUBREGION**

	Total	Very-low income	Low income	Moderate income	Above moderate income
Arroyo Verdugo	22,143	5,974	3,572	3,650	8,947
CVAG	31,557	6,183	4,652	5,551	15,171
Gateway	74,423	20,805	10,776	11,221	31,621
Imperial	11,661	3,452	1,754	1,613	4,841
Las Virgenes Malibu	932	357	198	182	196
Los Angeles City	455,565	115,676	68,591	74,934	196,364
North LA County	27,428	7,837	4,127	4,278	11,185
OCCOG	173,050	43,136	27,305	30,442	72,167
SBCTA/SBCOG	128,972	33,381	20,491	22,566	52,534
SGVCOG	89,407	25,119	13,360	14,042	36,886
South Bay Cities	34,099	10,183	5,220	5,525	13,170
Unincorporated	155,364	42,801	24,347	25,907	62,309
Ventura	23,139	5,434	3,574	4,267	9,864
Westside Cities	19,225	5,957	3,635	3,538	6,095
WRCOG	94,869	25,342	15,144	16,224	38,159

**ALLOCATION BY LOCAL JURISDICTION**

County	Subregion	Total	Very-low income	Low income	Moderate income	Above moderate income
Adelanto city	San Bernardino SBCTA/SBCOG	3755	393	565	650	2148
Agoura Hills city	Los Angeles Las Virgenes Malibu	318	126	72	55	65
Alhambra city	Los Angeles SGVCOG	6810	1769	1033	1077	2931
Aliso Viejo city	Orange OCCOG	1193	388	213	205	386
Anaheim city	Orange OCCOG	17412	3757	2391	2939	8325
Apple Valley town	San Bernardino SBCTA/SBCOG	4281	1082	599	745	1855
Arcadia city	Los Angeles SGVCOG	3205	1098	568	604	935
Artesia city	Los Angeles Gateway	1067	310	168	128	462
Avalon city	Los Angeles Gateway	27	7	5	3	12
Azusa city	Los Angeles SGVCOG	2644	757	366	381	1139
Baldwin Park city	Los Angeles SGVCOG	1996	574	274	262	886
Banning city	Riverside WRCOG	1669	315	192	279	882
Barstow city	San Bernardino SBCTA/SBCOG	1516	171	227	299	819
Beaumont city	Riverside WRCOG	4201	1225	719	722	1535
Bell city	Los Angeles Gateway	228	42	23	29	134
Bell Gardens city	Los Angeles Gateway	502	99	29	72	303
Bellflower city	Los Angeles Gateway	3725	1011	486	552	1676
Beverly Hills city	Los Angeles Westside Cities	3096	1005	678	600	813
Big Bear Lake city	San Bernardino SBCTA/SBCOG	212	49	33	37	93
Blythe city	Riverside CVAG	493	81	70	96	245
Bradbury city	Los Angeles SGVCOG	40	15	8	9	8
Brawley city	Imperial Imperial	1423	397	209	202	615
Brea city	Orange OCCOG	2360	666	392	402	899
Buena Park city	Orange OCCOG	8900	2113	1340	1570	3876
Burbank city	Los Angeles Arroyo Verdugo	8752	2546	1415	1406	3386
Calabasas city	Los Angeles Las Virgenes Malibu	353	131	70	70	82
Calexico city	Imperial Imperial	4854	1274	653	612	2315
Calimesa city	Riverside WRCOG	2012	493	274	378	867
Calipatria city	Imperial Imperial	151	35	21	16	79
Camarrillo city	Ventura Ventura	1372	351	243	270	508
Canyon Lake city	Riverside WRCOG	129	43	23	24	39
Carson city	Los Angeles South Bay Cities	5606	1765	911	873	2057

## ESTIMATE OF SCAG RHNA ALLOCATION BASED ON STAFF-RECOMMENDED FINAL RHNA METHODOLOGY

	County	Subregion	Total	Very-low income	Low income	Moderate income	Above moderate income
Cathedral City city	Riverside	CVAG	2543	537	352	456	1197
Cerritos city	Los Angeles	Gateway	1902	676	344	331	551
Chino city	San Bernardino	SBCTA/SBCOG	6959	2106	1281	1200	2373
Chino Hills city	San Bernardino	SBCTA/SBCOG	3720	1384	819	787	731
Claremont city	Los Angeles	SGVCOG	1705	553	308	296	548
Coachella city	Riverside	CVAG	7875	1030	998	1366	4482
Colton city	San Bernardino	SBCTA/SBCOG	5418	1313	666	904	2536
Commerce city	Los Angeles	Gateway	246	54	22	38	132
Compton city	Los Angeles	Gateway	1001	234	120	130	517
Corona city	Riverside	WRCOG	6078	1748	1038	1094	2198
Costa Mesa city	Orange	OCCOG	11727	2910	1789	2083	4946
Covina city	Los Angeles	SGVCOG	1908	612	267	281	747
Cudahy city	Los Angeles	Gateway	393	79	36	53	224
Culver City city	Los Angeles	Westside Cities	3332	1104	602	558	1067
Cypress city	Orange	OCCOG	3924	1145	655	622	1502
Dana Point city	Orange	OCCOG	529	146	84	101	199
Desert Hot Springs city	Riverside	CVAG	3864	567	534	686	2077
Diamond Bar city	Los Angeles	SGVCOG	2514	841	432	435	805
Downey city	Los Angeles	Gateway	6504	2072	943	912	2578
Duarte city	Los Angeles	SGVCOG	873	263	142	135	333
Eastvale City	Riverside	WRCOG	3021	1141	671	634	576
El Centro city	Imperial	Imperial	3431	997	488	460	1485
El Monte city	Los Angeles	SGVCOG	8482	1791	851	1230	4610
El Segundo city	Los Angeles	South Bay Cities	491	188	88	83	132
Fillmore city	Ventura	Ventura	413	72	60	72	209
Fontana city	San Bernardino	SBCTA/SBCOG	17476	5095	2943	3029	6410
Fountain Valley city	Orange	OCCOG	4832	1304	785	833	1911
Fullerton city	Orange	OCCOG	13180	3189	1985	2267	5739
Garden Grove city	Orange	OCCOG	19124	4154	2795	3204	8970
Gardena city	Los Angeles	South Bay Cities	5719	1479	758	892	2589
Glendale city	Los Angeles	Arroyo Verdugo	13391	3429	2158	2244	5561
Glendora city	Los Angeles	SGVCOG	2271	732	385	387	766
Grand Terrace city	San Bernardino	SBCTA/SBCOG	628	187	91	106	243
Hawaiian Gardens city	Los Angeles	Gateway	330	60	43	46	181
Hawthorne city	Los Angeles	South Bay Cities	1731	443	204	249	835
Hemet city	Riverside	WRCOG	6451	809	730	1171	3741
Hermosa Beach city	Los Angeles	South Bay Cities	556	231	126	105	94
Hesperia city	San Bernardino	SBCTA/SBCOG	8135	1915	1228	1406	3587
Hidden Hills city	Los Angeles	Las Virgenes Malibu	41	16	8	9	7
Highland city	San Bernardino	SBCTA/SBCOG	2508	617	408	470	1013
Holtville city	Imperial	Imperial	171	40	33	26	73
Huntington Beach city	Orange	OCCOG	13337	3651	2179	2303	5204
Huntington Park city	Los Angeles	Gateway	1601	263	195	242	901
Imperial city	Imperial	Imperial	1598	702	345	294	258
Indian Wells city	Riverside	CVAG	381	116	80	91	94
Indio city	Riverside	CVAG	7793	1787	1167	1312	3527
Industry city	Los Angeles	SGVCOG	17	5	4	2	6
Inglewood city	Los Angeles	South Bay Cities	7422	1808	952	1110	3552
Irvine city	Orange	OCCOG	23555	6379	4225	4299	8652
Irwindale city	Los Angeles	SGVCOG	119	35	11	16	56
Jurupa Valley City	Riverside	WRCOG	4484	1203	747	729	1806
La Cañada Flintridge city	Los Angeles	SGVCOG	611	251	135	139	87
La Habra city	Orange	OCCOG	803	191	116	130	367
La Habra Heights city	Los Angeles	Gateway	171	77	34	31	29
La Mirada city	Los Angeles	Gateway	1958	632	341	319	665
La Palma city	Orange	OCCOG	800	222	140	137	301
La Puente city	Los Angeles	SGVCOG	1928	543	275	275	836
La Quinta city	Riverside	CVAG	1526	419	268	296	544
La Verne city	Los Angeles	SGVCOG	1343	412	238	223	470
Laguna Beach city	Orange	OCCOG	393	117	80	79	118
Laguna Hills city	Orange	OCCOG	1979	565	352	353	709
Laguna Niguel city	Orange	OCCOG	1205	347	201	223	435
Laguna Woods city	Orange	OCCOG	992	125	135	191	541
Lake Elsinore city	Riverside	WRCOG	6666	1873	1097	1131	2566
Lake Forest city	Orange	OCCOG	3229	953	541	558	1177
Lakewood city	Los Angeles	Gateway	3915	1293	636	652	1335
Lancaster city	Los Angeles	North LA County	9004	2218	1192	1326	4269
Lawndale city	Los Angeles	South Bay Cities	2491	729	310	370	1082

## ESTIMATE OF SCAG RHNA ALLOCATION BASED ON STAFF-RECOMMENDED FINAL RHNA METHODOLOGY

	County	Subregion	Total	Very-low income	Low income	Moderate income	Above moderate income
Loma Linda city	San Bernardino	SBCTA/SBCOG	2052	522	311	353	866
Lomita city	Los Angeles	South Bay Cities	828	238	123	127	339
Long Beach city	Los Angeles	Gateway	26440	7122	4038	4149	11131
Los Alamitos city	Orange	OCCOG	767	192	118	145	312
Los Angeles city	Los Angeles	Los Angeles City	455565	115676	68591	74934	196364
Lynwood city	Los Angeles	Gateway	1555	375	138	235	807
Malibu city	Los Angeles	Las Virgenes Malibu	78	27	18	17	17
Manhattan Beach city	Los Angeles	South Bay Cities	773	321	164	155	133
Maywood city	Los Angeles	Gateway	364	54	47	55	209
Menifee city	Riverside	WRCOG	6593	1755	1049	1103	2686
Mission Viejo city	Orange	OCCOG	2211	671	400	396	744
Monrovia city	Los Angeles	SGVCOG	1670	518	262	254	636
Montclair city	San Bernardino	SBCTA/SBCOG	2589	696	382	399	1112
Montebello city	Los Angeles	SGVCOG	5171	1309	705	774	2383
Monterey Park city	Los Angeles	SGVCOG	5246	1320	820	846	2260
Moorpark city	Ventura	Ventura	1287	376	233	245	434
Moreno Valley city	Riverside	WRCOG	13595	3768	2046	2161	5620
Murrieta city	Riverside	WRCOG	3035	1005	581	543	905
Needles city	San Bernardino	SBCTA/SBCOG	86	9	10	16	51
Newport Beach city	Orange	OCCOG	4832	1451	927	1048	1406
Norco city	Riverside	WRCOG	453	144	84	81	143
Norwalk city	Los Angeles	Gateway	5024	1542	757	657	2068
Ojai city	Ventura	Ventura	52	12	8	10	22
Ontario city	San Bernardino	SBCTA/SBCOG	20803	5624	3279	3322	8579
Orange city	Orange	OCCOG	3927	1064	603	676	1585
Oxnard city	Ventura	Ventura	8529	1834	1068	1535	4092
Palm Desert city	Riverside	CVAG	2785	673	459	460	1193
Palm Springs city	Riverside	CVAG	2554	543	407	461	1142
Palmdale city	Los Angeles	North LA County	6625	1772	933	1001	2919
Palos Verdes Estates city	Los Angeles	South Bay Cities	198	81	44	47	26
Paramount city	Los Angeles	Gateway	363	90	43	48	182
Pasadena city	Los Angeles	SGVCOG	9409	2739	1659	1562	3449
Perris city	Riverside	WRCOG	7786	2024	1124	1271	3367
Pico Rivera city	Los Angeles	Gateway	3939	1148	562	572	1657
Placentia city	Orange	OCCOG	4363	1226	678	768	1690
Pomona city	Los Angeles	SGVCOG	10532	2791	1336	1506	4899
Port Hueneme city	Ventura	Ventura	125	25	15	18	66
Rancho Cucamonga city	San Bernardino	SBCTA/SBCOG	10500	3236	1916	2033	3315
Rancho Mirage city	Riverside	CVAG	1743	429	317	328	670
Rancho Palos Verdes city	Los Angeles	South Bay Cities	637	251	138	125	122
Rancho Santa Margarita city	Orange	OCCOG	679	208	120	125	227
Redlands city	San Bernardino	SBCTA/SBCOG	3507	963	614	650	1280
Redondo Beach city	Los Angeles	South Bay Cities	2483	932	507	489	555
Rialto city	San Bernardino	SBCTA/SBCOG	8252	2211	1203	1368	3470
Riverside city	Riverside	WRCOG	18419	4849	3057	3133	7379
Rolling Hills city	Los Angeles	South Bay Cities	44	19	9	11	6
Rolling Hills Estates city	Los Angeles	South Bay Cities	191	81	42	38	30
Rosemead city	Los Angeles	SGVCOG	4604	1151	636	685	2131
San Bernardino city	San Bernardino	SBCTA/SBCOG	8104	1411	1094	1445	4154
San Buenaventura (Ventura) city	Ventura	Ventura	5302	1184	863	948	2307
San Clemente city	Orange	OCCOG	975	279	162	186	347
San Dimas city	Los Angeles	SGVCOG	1245	382	219	206	438
San Fernando city	Los Angeles	North LA County	1790	459	272	283	776
San Gabriel city	Los Angeles	SGVCOG	3017	843	414	465	1295
San Jacinto city	Riverside	WRCOG	3385	797	464	559	1565
San Juan Capistrano city	Orange	OCCOG	1052	268	172	183	428
San Marino city	Los Angeles	SGVCOG	398	149	91	91	68
Santa Ana city	Orange	OCCOG	3087	583	360	522	1621
Santa Clarita city	Los Angeles	North LA County	10009	3388	1730	1668	3222
Santa Fe Springs city	Los Angeles	Gateway	950	252	158	152	388
Santa Monica city	Los Angeles	Westside Cities	8874	2786	1668	1698	2721
Santa Paula city	Ventura	Ventura	655	101	98	121	335
Seal Beach city	Orange	OCCOG	1240	256	200	238	545
Sierra Madre city	Los Angeles	SGVCOG	204	78	38	34	53
Signal Hill city	Los Angeles	Gateway	516	159	78	90	189
Simi Valley city	Ventura	Ventura	2788	746	492	517	1032
South El Monte city	Los Angeles	SGVCOG	576	130	63	70	313
South Gate city	Los Angeles	Gateway	8263	2130	991	1171	3971

## ESTIMATE OF SCAG RHNA ALLOCATION BASED ON STAFF-RECOMMENDED FINAL RHNA METHODOLOGY

	County	Subregion	Total	Very-low income	Low income	Moderate income	Above moderate income
South Pasadena city	Los Angeles	SGVCOG	2061	754	397	333	578
Stanton city	Orange	OCCOG	1228	164	144	231	690
Temecula city	Riverside	WRCOG	4183	1355	799	777	1253
Temple City city	Los Angeles	SGVCOG	2183	628	349	369	837
Thousand Oaks city	Ventura	Ventura	2616	733	493	531	860
Torrance city	Los Angeles	South Bay Cities	4929	1617	844	851	1617
Tustin city	Orange	OCCOG	6777	1722	1045	1131	2879
Twentynine Palms city	San Bernardino	SBCTA/SBCOG	1044	229	126	184	504
Unincorporated Imperial Co.	Imperial	Unincorporated	4292	1200	595	579	1919
Unincorporated Los Angeles Co.	Los Angeles	Unincorporated	89849	25583	13662	14152	36452
Unincorporated Orange Co.	Orange	Unincorporated	10375	3128	1861	2034	3352
Unincorporated Riverside Co.	Riverside	Unincorporated	40765	10398	6647	7370	16350
Unincorporated San Bernardino Co.	San Bernardino	Unincorporated	8824	2176	1358	1522	3768
Unincorporated Ventura Co.	Ventura	Unincorporated	1259	317	225	249	468
Upland city	San Bernardino	SBCTA/SBCOG	5673	1579	956	1011	2127
Vernon city	Los Angeles	Gateway	8	4	4	0	0
Victorville city	San Bernardino	SBCTA/SBCOG	8146	1730	1133	1500	3782
Villa Park city	Orange	OCCOG	295	92	59	61	83
Walnut city	Los Angeles	SGVCOG	1292	426	224	231	411
West Covina city	Los Angeles	SGVCOG	5333	1648	847	863	1974
West Hollywood city	Los Angeles	Westside Cities	3923	1062	687	681	1493
Westlake Village city	Los Angeles	Las Virgenes Malibu	142	57	29	32	24
Westminster city	Orange	OCCOG	9733	1874	1469	1780	4610
Westmorland city	Imperial	Imperial	33	7	5	4	17
Whittier city	Los Angeles	Gateway	3431	1022	535	555	1319
Wildomar city	Riverside	WRCOG	2709	795	449	433	1032
Yorba Linda city	Orange	OCCOG	2410	762	449	456	742
Yucaipa city	San Bernardino	SBCTA/SBCOG	2859	705	492	509	1153
Yucca Valley town	San Bernardino	SBCTA/SBCOG	749	154	116	145	334

**RHNA Timeline of Key Activities and Milestones**  
October 2018 - January 2020

Date	Type	Milestone
10/29/18	Meeting	RHNA Subcommittee Meeting #1: <i>Kickoff</i>
12/3/18	Meeting	RHNA Subcommittee Meeting #2: <i>Action- Subcommittee charter</i>
2/4/19	Meeting	RHNA Subcommittee Meeting #3: <i>Action-subregional delegation guidelines</i>
2/7/19	Meeting	Regional Council and CEHD Meeting: <i>Action-RHNA Subcommittee charter</i>
3/4/19	Meeting	RHNA Subcommittee Meeting #4: <i>Action-release of methodology surveys, discussion on RHNA methodology</i>
3/7/19	Meeting	CEHD Meeting: <i>Action-Subregional delegation guidelines</i>
3/27/19	Panel	Convened Panel of Experts on technical issues related to regional determination
4/1/19	Meeting	RHNA Subcommittee Meeting #5: <i>Discussion on RHNA methodology</i>
4/4/19	Meeting	Regional Council Meeting: <i>Action-Subregional delegation guidelines</i>
5/6/19	Meeting	RHNA Subcommittee Meeting #6: <i>Action- regional determination package, discussion on RHNA methodology</i>
6/3/19	Meeting	RHNA Subcommittee Meeting #7: <i>Action- amended regional determination package, discussion on RHNA methodology</i>
6/6/19	Meeting	CEHD and Regional Council Meeting: <i>Action – submission of regional consultation package to HCD</i>
6/20/19	Submission	Submission of regional consultation package to HCD
7/22/19	Meeting	RHNA Subcommittee Meeting #8: <i>Action-release of proposed methodology options for public review</i>
7/29/19	Webinar	RHNA 101 Webinar
8/1/19	Meeting	Release of Proposed Methodology for Public Comment ( <i>CEHD and Regional Council Action</i> )
8/1/19- 9/1/319	Public comment period	Public comment period on proposed RHNA methodology
8/15/19	Hearing	Proposed Methodology Public Hearing #1, SCAG Los Angeles Office
8/20/19	Hearing	Proposed Methodology Public Hearing #2, SCAG Los Angeles Office
8/22/19	Correspondence	Receipt of regional determination from HCD
8/22/19	Hearing	Proposed Methodology Public Hearing #3, Irvine City Hall
8/22/19	Hearing	Proposed Methodology Public Hearing #4, SBCTA Board Room
8/29/19	Workshop	Proposed Methodology Public Information Session, Santa Clarita
9/5/19	Meeting	CEHD and Regional Council Meeting: <i>Action-Objection to regional determination from HCD</i>
9/13/19	Due date	Comment deadline for proposed methodology
9/18/19	Submission	Submission of objection letter of regional determination to HCD
9/25/19	Workshop	Preview workshop of staff recommended draft RHNA methodology

10/7/19	Meeting	RHNA Subcommittee Meeting #9: <i>Action-recommendation of draft RHNA methodology Mayor Bailey's Substitute Motion failed in a 4-3 votes</i>
10/15/19	Correspondence	Receipt of final regional determination from HCD
10/17/19	Meeting	Briefing on technical issues related to staff recommended draft RHNA methodology as part of the Technical Working Group meeting
10/21/19	Meeting	CEHD Special Meeting: <i>Action- recommendation of draft RHNA methodology (unanimous)</i>
10/21/19	Correspondence	Commenter letter from SBCTA objecting to staff-recommended draft RHNA methodology due to inequitable regional distribution
10/22/19	Correspondence	Received e-mail from Mayor Sahli-Wells requesting staff presentation of Mayor Bailey's Alternative RHNA Methodology for the November 7, 2019 Regional Council meeting
11/1/19	Correspondence	Received letter jointly signed by Mayor Bailey, Supervisor Spiegel, Mayor Navarro & EEC Member Toni Momberger recommending an Alternative RHNA Methodology for the November 7, 2019 Regional Council meeting
11/2/19	Staff Report	Staff Report posted including analysis of Alternative Methodology
11/5/19	Correspondence	Commenter letter from Mayor of Los Angeles objecting to staff-recommended draft RHNA methodology including recommendations with some overlap with Bailey's Alternative Methodology
11/5/19	Correspondence	E-mail from Kome to RC members including the letter from Mayor Bailey & the Estimator (calculator) for Alternative Methodology, enabling side-by-side comparison of jurisdictions' estimated RHNA allocations under either scenario.
11/6/19	Staff Memo	SCAG staff's initial response provided to City of Los Angeles on its Recommended Changes to RHNA methodology
11/7/19	Meeting	Regional Council Meeting: <i>Action-Approval of Bailey's Alternative Methodology by a 43-19 votes; approved methodology submittal to HCD for review</i>
11/14/19	Submission	Submission of draft RHNA methodology to HCD as approved by Regional Council
1/13/20	Correspondence	Receipt of HCD's review of SCAG's draft RHNA methodology, which is found to further the five statutory objectives of RHNA





Southern California Association of Governments  
900 Wilshire Boulevard, Suite 1700, Los Angeles, California 90017  
**February 24, 2020**

**To:** Regional Housing Needs Assessment Subcommittee (RHNA)

**EXECUTIVE DIRECTOR'S  
APPROVAL**

**From:** Kome Ajise, Executive Director, Executive Management,  
213-236-1835, [Ajise@scag.ca.gov](mailto:Ajise@scag.ca.gov)

**Subject:** 6th Cycle RHNA Appeals Procedures

**RECOMMENDED ACTION:**

Recommend that the Community, Economic and Human Development (CEHD) Committee recommend Regional Council approval of the 6<sup>th</sup> Cycle RHNA Appeals Procedures.

**STRATEGIC PLAN:**

This item supports the following Strategic Plan Goal 2: Advance Southern California’s policy interests and planning priorities through regional, statewide, and national engagement and advocacy.

**EXECUTIVE SUMMARY:**

*Per Government Code Section 65584.05(b) within forty-five (45) days of receipt of the draft RHNA allocation, local jurisdictions and the California Department of Housing and Community Development (HCD) may appeal any jurisdiction’s draft RHNA allocation. SCAG staff has developed 6<sup>th</sup> Cycle RHNA Appeals Procedures that outline the appeals process, and includes information on bases for appeals, the public hearings to hear appeals, and the reallocation of successful appeals.*

**BACKGROUND:**

Subsequent to the adoption of the final RHNA methodology, SCAG will release a draft RHNA allocation plan. Per Government Code Section 65584.05(b), within 45 days of receipt of the draft RHNA allocation, local jurisdictions and the California Department of Housing and Community Development (HCD) may appeal any jurisdiction’s draft RHNA allocation. The distribution of a draft RHNA allocation is dependent on the adoption of a final RHNA methodology. Assuming that the final RHNA methodology is adopted on March 5, 2020 by the Regional Council and a draft RHNA allocation receipt date of Friday, April 10, 2020, the 45-day filing period will end on Monday, May 25, 2020.

**OUR MISSION**

*To foster innovative regional solutions that improve the lives of Southern Californians through inclusive collaboration, visionary planning, regional advocacy, information sharing, and promoting best practices.*

**OUR VISION**

*Southern California’s Catalyst for a Brighter Future*

**OUR CORE VALUES**

*Be Open | Lead by Example | Make an Impact | Be Courageous*

Appeals may be filed on any draft RHNA allocation within the SCAG region by any SCAG jurisdiction and HCD. Per Government Code Section 65584.05(b), an appeal may only be filed on at least one of the following bases:

- Local planning factors and information relating to affirmatively furthering fair housing;
- Application of adopted final methodology
- Significant and Unforeseen change in circumstances

Regarding a “significant and unforeseen change in circumstances,” Government Code Section 65584.05(b)(3) requires it is based on a local planning factor as described in Government Code Section 65584.04(b) and by extension, subsection (e). This would require that any qualifying change in circumstances would need to have occurred after SCAG’s methodology survey packet was distributed in Spring 2019. Additionally, an appeal based on a change in circumstances may only be filed by a jurisdiction appealing its own draft RHNA allocation.

Additionally, in accordance with State housing law, an appeal cannot be granted based on the following factors:

- A local jurisdiction’s existing zoning ordinance and land use restrictions
- Any local ordinance, policy, voter-approved measure or standard limiting residential development.
- Prior underproduction of housing in a jurisdiction from the previous regional housing need allocation.
- Stable population numbers in a jurisdiction.

More detailed descriptions of these exclusions for appeals is included in Section I.D of the attached 6th Cycle RHNA Appeals Procedures, which is attached to this report.

Applicants of an appeal must complete an appeals form (Exhibit A) that will be available on the SCAG RHNA webpage ([www.scag.ca.gov/rhna](http://www.scag.ca.gov/rhna)) after the appeals procedures are adopted by the Regional Council. Directions on how to electronically submit the form and supporting documentation will be provided on the final form and on the RHNA webpage.

Following the conclusion of the filing period, all jurisdictions will be notified by SCAG of all appeals filed and related attachments will be posted on SCAG’s website. Per Government Code Section 65584.05(c) Jurisdictions and HCD will have 45 days, or until June 9, 2020 (assuming that the draft RHNA allocation will be available in early April), to comment on filed appeals.

Within 30 days of the end of the appeal comment period, SCAG must conduct public hearings to hear all filed appeals. The hearing body will be the RHNA Subcommittee, also known at this point as the RHNA Appeals Board. The RHNA Appeals Board will be subject to the RHNA Subcommittee

Charter, which was adopted by the SCAG Regional Council at their February 7, 2019 meeting. All decisions made by the Appeals Board will be considered final and not reviewed by the CEHD Committee or Regional Council.

Public notice of hearings will be posted within 21 days of the scheduled public hearings. Because it is unknown at this time how many appeals will be filed, SCAG staff is currently unable to set the date of the hearings. However, the public hearings will most likely take place during the latter half of July 2020 assuming that the draft RHNA allocation will be available in early April.

The appeals hearings will be organized by each jurisdiction subject to an appeal. Appeal applicants that have filed an appeal will be allotted time during the public hearing to present their argument for an adjustment to the jurisdiction's draft RHNA allocation. Jurisdictions that are the subject of an appeal but did not file an appeal on their own draft RHNA allocation will also be allotted time to present. SCAG staff will provide a recommendation and staff report for each subject jurisdiction, after which applicants and the subject jurisdiction which did not file an appeal but is the subject of an appeal (if applicable) may present a brief rebuttal. The RHNA Appeals Board is encouraged to make one finding on the subject jurisdiction after hearing all arguments and presentations on each subject jurisdiction. A full description of the public hearing procedures, including time allotments, are including in the 6<sup>th</sup> Cycle RHNA Appeals Procedures, which is an attachment to this report.

All successful appeals, except in determined cases as outlined in the Appeals Procedures Section H, will be reallocated back to all jurisdictions in the SCAG region, including those who had successful appeals. A full description of the methodology for successful appeal redistribution is described in the 6<sup>th</sup> Cycle RHNA Appeals Procedures.

The results of the appeals process and its subsequent reallocation will be included in the proposed final RHNA Allocation Plan, which will be reviewed by the RHNA Subcommittee, CEHD Committee, and Regional Council between August and September 2020. The final RHNA Allocation Plan is scheduled for adoption on October 1, 2020 by the Regional Council.

#### Differences between the 5<sup>th</sup> and 6<sup>th</sup> Cycles Appeals Procedures

There are several noticeable differences between the 5<sup>th</sup> and proposed 6<sup>th</sup> Cycle RHNA Appeals Procedures. First, for the 6<sup>th</sup> Cycle any jurisdiction and HCD may file an appeal on any jurisdiction whereas in the 5<sup>th</sup> cycle only a jurisdiction could file an appeal on its own draft RHNA allocation. Additionally, there were two separate processes in which a jurisdiction could request a reduction to its draft RHNA allocation – a revision request and an appeal. However, due to recent legislation the process has been streamlined into one appeals process.

Moreover in prior RHNA cycles, an appeal could not be based on local ordinances or voter-approved measures that limited the number of residential permits issued. For the 6<sup>th</sup> cycle, in addition to

these types of local ordinances, also excluded from appeals are underproduction of housing units since the last RHNA cycle and stable population growth.

#### Next Steps

A draft of the proposed 6<sup>th</sup> Cycle RHNA Appeals Procedures was presented at a public workshop on February 3, 2020. The purpose of the workshop was to provide the public a preview of SCAG staff proposals on the procedures and solicit comments until February 10, 2020. A number of jurisdictions provided written comments on the procedures, several of which have been directly incorporated into the procedures and attachments. Written comments received on the draft 6<sup>th</sup> Cycle RHNA Appeals Procedures can found posted on the RHNA webpage.

Pending action of the RHNA Subcommittee, SCAG staff will forward its recommendation to the CEHD Committee for further recommendation of adoption by the Regional Council. Both the CEHD Committee and Regional Council meetings are scheduled for March 5, 2020. Following Regional Council adoption, SCAG will post the procedures along with a final appeal application form and directions for filing an appeal on the SCAG RHNA webpage. Key dates of the appeals process will be finalized after the adoption of the final RHNA methodology.

#### **FISCAL IMPACT:**

Work associated with this item is included in the current FY 19-20 General Fund Budget (800.0160.03: RHNA).

#### **ATTACHMENT(S):**

1. 6th Cycle RHNA Appeals Procedures
2. Exhibit A Appeal Request Form
3. Exhibit C-GOV\_65080.
4. Exhibit C -GOV\_65584.
5. Exhibit C - GOV\_65584.04
6. Exhibit C -GOV\_65584.05
7. RHNA Subcommittee Charter
8. RHNA Appeals 022420

## 6th Cycle RHNA Appeals Procedures

Pursuant to Government Code section 65584.05, any local jurisdiction within the SCAG region may file an appeal to modify its allocated share or another jurisdiction's share of the regional housing need included as part of SCAG's Draft Regional Housing Needs Assessment (RHNA) Allocation Plan, hereinafter referred to as the "Draft RHNA Plan." The California Department of Housing and Community Development, hereinafter referred to as "HCD", may also file an appeal to one or more jurisdiction's draft RHNA allocation. No appeal shall be allowed relating to post-appeal reallocation adjustments made by SCAG, as further described in Section II, below.

### **I. APPEALS PROCESS**

#### **A. DEADLINE TO FILE**

The period to file appeals shall commence on April 10, 2020<sup>1</sup>, which shall be deemed as the date of receipt by jurisdictions and HCD of the draft RHNA Plan. In order to comply with Government Code § 65584.05(b), a jurisdiction or HCD seeking to appeal a draft allocation of the regional housing need must file an appeal by 5:00 p.m. May 25, 2020<sup>2</sup>. Late appeals shall not be accepted by SCAG.

#### **B. FORM OF APPEAL**

The local jurisdiction shall state the basis and specific reasons for its appeal on the appeal form prepared by SCAG, a copy of which is attached hereto as Exhibit "A". Additional documents may be submitted by the local jurisdiction as attachments, and all such attachments should be properly labeled and numbered.

#### **C. BASES FOR APPEAL**

Local jurisdictions shall only file an appeal based upon the criteria listed below. In order to provide guidance to potential appellants, information regarding SCAG's allocation methodology approved by SCAG's Regional Council on March 5, 2020<sup>3</sup>, and application of local factors in the development of SCAG's adopted Final Methodology is attached hereto as Exhibit "B". Appeals based on "change in circumstances" can only be filed by the jurisdiction or jurisdictions where the change in circumstances occurred.

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<sup>1</sup> This date assumes that the draft RHNA allocation will be available in early April 2020. Dates related to the appeal process will be finalized after the adoption of the Final RHNA Methodology.

<sup>2</sup> This date assumes that the draft RHNA allocation will be available in early April 2020. Dates related to the appeal process will be finalized after the adoption of the Final RHNA Methodology.

<sup>3</sup> This date is the scheduled date for adoption of the Final RHNA Methodology by the SCAG Regional Council. In the event of a date change, this section will be amended.

Pursuant to Government Code Section 65584.05, filed appeals must include a statement as to why the revision is necessary to further the intent of the objectives listed in Section 65584. Additionally, Government Code Section 65584.05(b) requires that all filed appeals must be consistent with, and not to the detriment of, the development pattern in the sustainable communities strategy, or SCAG's Connect SoCal Plan, pursuant to Government Code Section 65080(b)(2).

1. Methodology – That SCAG failed to determine the jurisdiction's share of the regional housing need in accordance with the information described in the allocation methodology established and approved by SCAG, and in a manner that furthers, and does not undermine the five objectives listed in Government Code Section 65584(d).
  
2. Local Planning Factors and Information Affirmatively Furthering Fair Housing (AFFH) – That SCAG failed to consider information submitted by the local jurisdiction relating to certain local factors outlined in Govt. Code § 65584.04(e) and information submitted by the local jurisdiction relating to affirmatively furthering fair housing pursuant to Government Code § 65584.04(b)(2) and 65584(d)(5) including the following:
  - a. Each jurisdiction's existing and projected jobs and housing relationship.
  - b. The opportunities and constraints to development of additional housing in each jurisdiction, including the following:
    - (1) lack of capacity for sewer or water service due to federal or state laws, regulations or regulatory actions, or supply and distribution decisions made by a sewer or water service provider other than the local jurisdiction that preclude the jurisdiction from providing necessary infrastructure for additional development during the planning period;
    - (2) the availability of land suitable for urban development or for conversion to residential use, the availability of underutilized land, and opportunities for infill development and increased residential densities;
    - (3) Lands preserved or protected from urban development under existing federal or state programs, or both, designed to protect open space,

farmland, environmental habitats, and natural resources on a long-term basis, including land zoned or designated for agricultural protection or preservation that is subject to a local ballot measure that was approved by the voters of that jurisdiction that prohibits or restricts conversion to non-agricultural uses.

- (4) County policies to preserve prime agricultural land, as defined pursuant to Government Code § 56064, within an unincorporated area, and land within an unincorporated area zoned or designated for agricultural protection or preservation that is subject to a local ballot measure that was approved by the voters of that jurisdiction that prohibits or restricts its conversion to non-agricultural uses.
- c. The distribution of household growth assumed for purposes of a comparable period of regional transportation plans and opportunities to maximize the use of public transportation and existing transportation infrastructure.
- d. Agreements between a county and cities in a county to direct growth toward incorporated areas of the county or designated for agricultural protection or preservation that is subject to a local ballot measure that was approved by the voters of the jurisdiction that prohibits or restricts conversion to nonagricultural uses.
- e. The loss of units contained in assisted housing developments, as defined in Government Code § 65583(a)(9), that changed to non-low-income use through mortgage prepayment, subsidy contract expirations, or termination of use restrictions.
- f. The percentage of existing households at each of the income levels listed in subdivision (e) of Section 65584 that are paying more than 30 percent and more than 50 percent of their income in rent.
- g. The rate of overcrowding.
- h. The housing needs of farmworkers.
- i. The housing needs generated by the presence of a private university or a campus of the California State University or

the University of California within any member jurisdiction.

- j. The loss of units during a state of emergency that was declared by the Governor pursuant to the California Emergency Services Act (Chapter 7(commencing with Section 8550) of Division 1 of Title 2), during the planning period immediately preceding the relevant revision pursuant to Section 65588 that have yet to be rebuilt or replaced at the time of the analysis. For purposes of these guidelines, this applies to loss of units during a state of emergency occurring since October 2013 and have not yet been rebuilt or replaced by the time of the development of the draft RHNA methodology, or November 7, 2019.
  - k. The region's greenhouse gas emissions targets provided by the State Air Resources Board pursuant to Section 65080, to be met by SCAG's Connect SoCal Plan.
  - l. Information based upon the issues, strategies, and actions that are included, as available in an Analysis of Impediments to Fair Housing Choice or an Assessment of Fair Housing completed by any city or county or the California Department of Housing and Community Development, and in housing elements
3. Changed Circumstances – That a significant and unforeseen change in circumstances has occurred in the jurisdiction after April 30, 2019 and merits a revision of the information previously submitted by the local jurisdiction. Appeals on this basis shall only be made by the jurisdiction or jurisdictions where the change in circumstances has occurred.

#### **D. LIMITS ON SCOPE OF APPEAL**

Existing law explicitly limits SCAG's scope of review of appeals. Specifically, SCAG shall not grant any appeal based upon the following:



1. Any other criteria other than the criteria in Section I.C above.
2. A local jurisdiction's existing zoning ordinance and land use restrictions, including but not limited to, the contents of the local jurisdiction's current general plan. Pursuant to Government Code Section 65584.04(e)(2)(B), SCAG may not limit its consideration of suitable housing sites or land suitable for urban development to existing zoning ordinances and land use restrictions of a locality, but shall consider the potential for increased residential development under alternative zoning ordinances and land use restrictions.
3. Any local ordinance, policy, voter-approved measure or standard limiting residential development. Pursuant to Government Code Section 65584.04(g)(1), any ordinance, policy, voter-approved measure, or standard of a city or county that directly or indirectly limits the number of residential building permits shall not be a justification for a determination or a reduction in a city's or county's share of regional housing need.
4. Prior underproduction of housing in a jurisdiction from the previous regional housing need allocation. Pursuant to Government Code Section 65584.04(g)(2), prior underproduction of housing in a jurisdiction from the previous housing need allocation, as determined by each jurisdiction's annual production report submitted to Government Code Section 65400(a)(2)(H) cannot be used as a justification for a determination or reduction in a jurisdiction's share of the regional housing need.
5. Stable population numbers in a jurisdiction. Pursuant to Government Code Section 65584.04(g)(3), stable population growth from the previous regional housing needs cycle cannot be used as a justification for a determination or reduction in a jurisdiction's share of the regional housing need.

#### **E. COMMENTS ON APPEALS**

At the close of the appeals period as set forth in I.A., SCAG shall notify all jurisdictions within the region and HCD of all appeals and shall make all materials submitted in support of each appeal available on its website after the close of the appeals filing period. Local jurisdictions and HCD may comment on one or more appeals within the 45

days following the end of the appeals filing period. All comments must be filed by 5:00 pm July 9, 2020<sup>4</sup>. No late comments shall be accepted by SCAG.

## **F. HEARING BODY**

SCAG's Regional Council has delegated the responsibility of considering appeals regarding draft allocations to the RHNA Subcommittee, also referred to as the RHNA Appeals Board. All provisions of the RHNA Subcommittee's charter shall apply with respect to the conduct of the appeal hearings. Per the RHNA Subcommittee charter, which was adopted on February 7, 2019 by the Regional Council, all decisions made by the RHNA Appeals Board are considered final and will not be reviewed by the SCAG CEHD Committee or Regional Council.

## **G. APPEAL HEARING**

SCAG shall conduct one public hearing to consider all appeals filed and comments received on the appeals no later than August 8, 2020<sup>5</sup>. This public hearing may be continued (over several days if necessary) until all appeals are heard. Notice shall be provided to the appealing jurisdictions, commenting jurisdictions, and HCD at least 21 days in advance of the hearing. The appeal hearing may take place provided that each county is represented either by a member or alternate of the RHNA Appeals Board. Alternates are permitted to participate in the appeal hearing, provided however, that each county shall only be entitled to one vote when deciding on the appeal. Ex-officio members may participate as non-voting members of the RHNA Appeals Board and are not counted for purposes of a quorum. In alignment with the adopted RHNA Subcommittee charter, in the event the hearing involves the member's or alternate's respective jurisdiction, the member or alternate may elect not to participate in the discussion and vote by the RHNA Subcommittee regarding such appeal.

### Appeal Hearing Procedures

The hearing(s) shall be conducted to provide applicants and jurisdictions that did not file appeals but are the subject of an appeal, with the opportunity to make their case regarding a change in their draft regional housing need allocation or another jurisdiction's allocation, with the burden on the applicants to prove their case. The appeals hearings will be organized by the specific jurisdiction subject to an appeal or appeals and will adhere to the following procedures:

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<sup>4</sup> This date assumes that the draft RHNA allocation will be available in early April 2020. Dates related to the appeal process will be finalized after the adoption of the Final RHNA Methodology.

<sup>5</sup> This date assumes that the draft RHNA allocation will be available in early April 2020. Dates related to the appeal process will be finalized after the adoption of the Final RHNA Methodology. Additionally, depending on the number of appeals filed and the complexity of the appeals SCAG may elect to extend this time period by thirty (30) days per Government Code Section 65584.05(i).

## 1. **Initial Arguments**

Applicants who have filed an appeal for a particular jurisdiction will have an opportunity to present their request and reasons to grant the appeal. In the event of multiple appeals filed for a single jurisdiction, the subject jurisdiction will present their argument first if it has filed an appeal on its own draft RHNA allocation. Applicants may present their case either on their own, or in coordination with other applicants, but each applicant shall be allotted five (5) minutes each. If the subject jurisdiction did not file an appeal on its own draft RHNA allocation, it will be given an opportunity to present after all applicants have provided initial arguments on their filed appeals. Any presentation from the jurisdiction who did not appeal but is the subject of the appeal is limited to five (5) minutes unless it is responding to more than one appeal, in which case the jurisdiction is limited to eight (8) minutes.

## 2. **Staff Response**

After initial arguments are presented, SCAG staff will present their recommendation to approve or deny the appeals filed for the subject jurisdiction. The staff response is limited to five (5) minutes.

## 3. **Rebuttal**

Applicants and the jurisdiction who did not file an appeal but is the subject of the appeal (if applicable) may elect to provide a rebuttal but are limited to the arguments and evidence presented in the staff response. Each applicant and the subject jurisdiction that did not file an appeal on its own draft RHNA allocation will be allotted three (3) minutes each for a rebuttal.

## 4. **Extension of Time Allotment**

The Chair of the Appeals Board may elect to grant additional time for any presentation, staff response, or rebuttal in the interest of due process and equity.

## 5. **Appeal Board Discussion and Determination**

After arguments and rebuttals are presented, the RHNA Appeals Board may ask questions of applicants, the subject jurisdiction (if present), and SCAG staff. The Chair of the Appeals Board may request that questions from the Appeals Board be asked prior to a discussion among Appeals Board members. Any voting Board member may make a motion regarding the appeal(s) for the subject jurisdiction. The Appeals Board is encouraged to make a single determination on the subject jurisdiction

after hearing all arguments and presentations on each subject jurisdiction.

The RHNA Appeals Board need not adhere to formal evidentiary rules and procedures in conducting the hearing. An appealing jurisdiction may choose to have technical staff present its case at the hearing. At a minimum, technical staff should be available at the hearing to answer any questions of the RHNA Appeals Board.

#### **H. DETERMINATION OF APPEAL**

The RHNA Appeals Board shall issue a written final determination on all filed appeals after the conclusion of the public hearing(s). The written final determination shall consider all arguments and comments presented on revising the draft RHNA allocation of the subject jurisdiction and make a determination for each subject jurisdiction. The final determinations shall be based upon the information and methodology set forth in Government Code section 65584.04 and whether the revision is necessary to further the objectives listed in Government Code section 65584(d). The final determination shall include written findings as to how the determination is consistent with Government Code section 65584.05. The decision of the RHNA Appeals Board shall be final, and local jurisdictions shall have no further right to appeal.

In accordance with existing law, the final determination on an appeal by the RHNA Subcommittee may require the adjustment of allocation of a local jurisdiction that is not the subject of an appeal. Specific adjustments to jurisdictions not the subject of an appeal as a result of an appeal will be included as part of the Appeal Board's determination. These specific adjustments may be excluded from the cumulative total adjustments required to be reallocated as described in Section II of these Appeals Guidelines if it is included as part of the appeals determination of the subject jurisdiction.

#### **I. ALTERNATIVE DATA REQUIREMENTS**

To the extent a local jurisdiction submits admissible alternative data or evidentiary documentation to SCAG in support of its appeal, such alternative data shall meet the following requirements:

1. The alternative data shall be readily available for SCAG's review and verification. Alternative data should not be constrained for use by proprietary conditions or other conditions rendering them difficult to obtain or process.
2. The alternative data shall be accurate, current, and reasonably free from defect.
3. The alternative data shall be relevant and germane to the local jurisdiction's basis of appeal.
4. The alternative data shall be used to support a logical analysis relating to the local jurisdiction's request for a change to its draft regional housing need allocation.

## **II. POST-APPEAL REALLOCATION OF REGIONAL HOUSING NEED**

In accordance with existing law (*see*, Government Code Section 65584.05(g)), after the conclusion of the appeals process, SCAG shall total the successfully appealed housing need allocations, except for adjustments made to jurisdictions not the subject of an appeal as determined by the Appeals Board in Section I.H. If the adjustments total seven percent (7%) or less of the regional housing need, SCAG shall distribute the adjustments proportionally, to all local jurisdictions. For purposes of these procedures, proportional distribution shall be based on the share of regional need after the appeals are determined and prior to the required redistribution.

If the adjustments total more than seven percent (7%) of the regional housing need, existing law requires that SCAG to develop a methodology to distribute the amount greater than seven percent to local governments. In this situation, SCAG will redistribute the amount greater than the seven percent based on the "residual" existing need calculation included in the adopted final RHNA methodology. To be consistent with the "residual" existing need calculation, successfully appealed units above the seven percent threshold will be redistributed to each county based on their proportion of total successful appeals. Fifty percent (50%) of each county's amount above the regional seven percent will be redistributed within the county based on population within a High Quality Transit Area (HQTA) and fifty percent (50%) of the amount will be redistributed within the county based on share of regional jobs accessible. Communities designated as disadvantaged, defined in the Final RHNA Methodology as having more than fifty percent (50%) of their population in lower resource areas, will be exempt from redistribution of the amount greater than seven percent. For more information regarding the existing need distribution in the Final RHNA Methodology, please refer to Exhibit B SCAG's adopted Final RHNA Methodology.

**III. FINAL RHNA PLAN**

After SCAG reallocates units to all local jurisdictions resulting from successful appeals, SCAG's Regional Council shall review and consider adoption of the Final RHNA Plan for SCAG's 6<sup>th</sup> cycle RHNA. This is scheduled to occur on October 1, 2020.

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## List of Exhibits

Exhibit A: Draft RHNA Appeal Form

Exhibit B: SCAG's Adopted 6<sup>th</sup> RHNA Cycle Final Methodology

Exhibit C:

- Government Code Section 65580
- Government Code Section 65584
- Government Code Section 65584.04
- Government Code Section 65584.05

Exhibit D: RHNA Subcommittee Charter

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# **Sixth Regional Housing Needs Assessment (RHNA) Cycle Appeal Request**

*All appeal requests must be received by SCAG May 21, 2012, 5 p.m. Appeals should be submitted to [housing@scag.ca.gov](mailto:housing@scag.ca.gov). Late submissions will not be accepted.*

Date:

Jurisdiction Subject to Appeal Filing:

\_\_\_\_\_

\_\_\_\_\_

Filing Party (Jurisdiction or HCD)

\_\_\_\_\_

Filing Party Contact Name

Filing Party Email:

\_\_\_\_\_

\_\_\_\_\_

## **APPEAL AUTHORIZED BY:**

Name: \_\_\_\_\_

## **PLEASE SELECT BELOW:**

- Mayor
- Chief Administrative Office
- City Manager
- Chair of County Board of Supervisors
- Planning Director
- Other: \_\_\_\_\_

## **BASES FOR APPEAL**

- RHNA Methodology
- Local Planning Factors and/or Information Related to Affirmatively Furthering Fair Housing (See Government Code Section 65584.04 (b)(2) and (e))
  - Existing or projected jobs-housing balance
  - Sewer or water infrastructure constraints for additional development
  - Availability of land suitable for urban development or for conversion to residential use
  - Lands protected from urban development under existing federal or state programs
  - County policies to preserve prime agricultural land
  - Distribution of household growth assumed for purposes of comparable Regional Transportation Plans
  - County-city agreements to direct growth toward incorporated areas of County
  - Loss of units contained in assisted housing developments
  - High housing cost burdens
  - The rate of overcrowding
  - Housing needs of farmworkers
  - Housing needs generated by the presence of a university campus within a jurisdiction
  - Loss of units during a state of emergency
  - The region's greenhouse gas emissions targets
  - Affirmatively furthering fair housing

## **FOR STAFF USE ONLY:**

Date \_\_\_\_\_

Hearing Date: \_\_\_\_\_

Planner: \_\_\_\_\_

RHNA Subcommittee Meeting - Feb. 24, 2020

**Sixth Regional Housing Needs Assessment (RHNA) Cycle Appeal Request**

*All appeal requests must be received by SCAG May 21, 2012, 5 p.m. Appeals should be submitted to [housing@scag.ca.gov](mailto:housing@scag.ca.gov). Late submissions will not be accepted.*

- Changed Circumstances (Per Government Code Section 65584.05(b)(3), appeals based on change in circumstances can only be made by the jurisdiction or jurisdictions where the change in circumstances occurred)

**Brief statement on why this revision is necessary to further the intent of the objectives listed in Government Code Section 65584 (please refer to Exhibit C of the Appeals Guidelines):**

**Brief Description of Appeal Request and Desired Outcome:**

**Number of units requested to be reduced or added to the jurisdiction’s draft RHNA allocation (circle one):**

Reduced \_\_\_\_\_ Added \_\_\_\_\_

**List of Supporting Documentation, by Title and Number of Pages:**

- 1.
- 2.
- 3.

**FOR STAFF USE ONLY:**

Date \_\_\_\_\_

Hearing Date: \_\_\_\_\_

Planner: \_\_\_\_\_

**State of California**

**GOVERNMENT CODE**

**Section 65080**

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65080. (a) Each transportation planning agency designated under Section 29532 or 29532.1 shall prepare and adopt a regional transportation plan directed at achieving a coordinated and balanced regional transportation system, including, but not limited to, mass transportation, highway, railroad, maritime, bicycle, pedestrian, goods movement, and aviation facilities and services. The plan shall be action-oriented and pragmatic, considering both the short-term and long-term future, and shall present clear, concise policy guidance to local and state officials. The regional transportation plan shall consider factors specified in Section 134 of Title 23 of the United States Code. Each transportation planning agency shall consider and incorporate, as appropriate, the transportation plans of cities, counties, districts, private organizations, and state and federal agencies.

(b) The regional transportation plan shall be an internally consistent document and shall include all of the following:

(1) A policy element that describes the transportation issues in the region, identifies and quantifies regional needs, and describes the desired short-range and long-range transportation goals, and pragmatic objective and policy statements. The objective and policy statements shall be consistent with the funding estimates of the financial element. The policy element of transportation planning agencies with populations that exceed 200,000 persons may quantify a set of indicators including, but not limited to, all of the following:

(A) Measures of mobility and traffic congestion, including, but not limited to, daily vehicle hours of delay per capita and vehicle miles traveled per capita.

(B) Measures of road and bridge maintenance and rehabilitation needs, including, but not limited to, roadway pavement and bridge conditions.

(C) Measures of means of travel, including, but not limited to, percentage share of all trips (work and nonwork) made by all of the following:

(i) Single occupant vehicle.

(ii) Multiple occupant vehicle or carpool.

(iii) Public transit including commuter rail and intercity rail.

(iv) Walking.

(v) Bicycling.

(D) Measures of safety and security, including, but not limited to, total injuries and fatalities assigned to each of the modes set forth in subparagraph (C).

(E) Measures of equity and accessibility, including, but not limited to, percentage of the population served by frequent and reliable public transit, with a breakdown by

income bracket, and percentage of all jobs accessible by frequent and reliable public transit service, with a breakdown by income bracket.

(F) The requirements of this section may be met using existing sources of information. No additional traffic counts, household surveys, or other sources of data shall be required.

(2) A sustainable communities strategy prepared by each metropolitan planning organization as follows:

(A) No later than September 30, 2010, the State Air Resources Board shall provide each affected region with greenhouse gas emission reduction targets for the automobile and light truck sector for 2020 and 2035, respectively.

(i) No later than January 31, 2009, the state board shall appoint a Regional Targets Advisory Committee to recommend factors to be considered and methodologies to be used for setting greenhouse gas emission reduction targets for the affected regions. The committee shall be composed of representatives of the metropolitan planning organizations, affected air districts, the League of California Cities, the California State Association of Counties, local transportation agencies, and members of the public, including homebuilders, environmental organizations, planning organizations, environmental justice organizations, affordable housing organizations, and others. The advisory committee shall transmit a report with its recommendations to the state board no later than September 30, 2009. In recommending factors to be considered and methodologies to be used, the advisory committee may consider any relevant issues, including, but not limited to, data needs, modeling techniques, growth forecasts, the impacts of regional jobs-housing balance on interregional travel and greenhouse gas emissions, economic and demographic trends, the magnitude of greenhouse gas reduction benefits from a variety of land use and transportation strategies, and appropriate methods to describe regional targets and to monitor performance in attaining those targets. The state board shall consider the report before setting the targets.

(ii) Before setting the targets for a region, the state board shall exchange technical information with the metropolitan planning organization and the affected air district. The metropolitan planning organization may recommend a target for the region. The metropolitan planning organization shall hold at least one public workshop within the region after receipt of the report from the advisory committee. The state board shall release draft targets for each region no later than June 30, 2010.

(iii) In establishing these targets, the state board shall take into account greenhouse gas emission reductions that will be achieved by improved vehicle emission standards, changes in fuel composition, and other measures it has approved that will reduce greenhouse gas emissions in the affected regions, and prospective measures the state board plans to adopt to reduce greenhouse gas emissions from other greenhouse gas emission sources as that term is defined in subdivision (i) of Section 38505 of the Health and Safety Code and consistent with the regulations promulgated pursuant to the California Global Warming Solutions Act of 2006 (Division 25.5 (commencing with Section 38500) of the Health and Safety Code), including Section 38566 of the Health and Safety Code.

(iv) The state board shall update the regional greenhouse gas emission reduction targets every eight years consistent with each metropolitan planning organization's timeframe for updating its regional transportation plan under federal law until 2050. The state board may revise the targets every four years based on changes in the factors considered under clause (iii). The state board shall exchange technical information with the Department of Transportation, metropolitan planning organizations, local governments, and affected air districts and engage in a consultative process with public and private stakeholders, before updating these targets.

(v) The greenhouse gas emission reduction targets may be expressed in gross tons, tons per capita, tons per household, or in any other metric deemed appropriate by the state board.

(B) Each metropolitan planning organization shall prepare a sustainable communities strategy, subject to the requirements of Part 450 of Title 23 of, and Part 93 of Title 40 of, the Code of Federal Regulations, including the requirement to use the most recent planning assumptions considering local general plans and other factors. The sustainable communities strategy shall (i) identify the general location of uses, residential densities, and building intensities within the region, (ii) identify areas within the region sufficient to house all the population of the region, including all economic segments of the population, over the course of the planning period of the regional transportation plan taking into account net migration into the region, population growth, household formation and employment growth, (iii) identify areas within the region sufficient to house an eight-year projection of the regional housing need for the region pursuant to Section 65584, (iv) identify a transportation network to service the transportation needs of the region, (v) gather and consider the best practically available scientific information regarding resource areas and farmland in the region as defined in subdivisions (a) and (b) of Section 65080.01, (vi) consider the state housing goals specified in Sections 65580 and 65581, (vii) set forth a forecasted development pattern for the region, which, when integrated with the transportation network, and other transportation measures and policies, will reduce the greenhouse gas emissions from automobiles and light trucks to achieve, if there is a feasible way to do so, the greenhouse gas emission reduction targets approved by the state board, and (viii) allow the regional transportation plan to comply with Section 176 of the federal Clean Air Act (42 U.S.C. Sec. 7506).

(C) (i) Within the jurisdiction of the Metropolitan Transportation Commission, as defined by Section 66502, the Association of Bay Area Governments shall be responsible for clauses (i), (ii), (iii), (v), and (vi) of subparagraph (B); the Metropolitan Transportation Commission shall be responsible for clauses (iv) and (viii) of subparagraph (B); and the Association of Bay Area Governments and the Metropolitan Transportation Commission shall jointly be responsible for clause (vii) of subparagraph (B).

(ii) Within the jurisdiction of the Tahoe Regional Planning Agency, as defined in Sections 66800 and 66801, the Tahoe Metropolitan Planning Organization shall use the Regional Plan for the Lake Tahoe Region as the sustainable community strategy, provided that it complies with clauses (vii) and (viii) of subparagraph (B).

(D) In the region served by the Southern California Association of Governments, a subregional council of governments and the county transportation commission may work together to propose the sustainable communities strategy and an alternative planning strategy, if one is prepared pursuant to subparagraph (I), for that subregional area. The metropolitan planning organization may adopt a framework for a subregional sustainable communities strategy or a subregional alternative planning strategy to address the intraregional land use, transportation, economic, air quality, and climate policy relationships. The metropolitan planning organization shall include the subregional sustainable communities strategy for that subregion in the regional sustainable communities strategy to the extent consistent with this section and federal law and approve the subregional alternative planning strategy, if one is prepared pursuant to subparagraph (I), for that subregional area to the extent consistent with this section. The metropolitan planning organization shall develop overall guidelines, create public participation plans pursuant to subparagraph (F), ensure coordination, resolve conflicts, make sure that the overall plan complies with applicable legal requirements, and adopt the plan for the region.

(E) The metropolitan planning organization shall conduct at least two informational meetings in each county within the region for members of the board of supervisors and city councils on the sustainable communities strategy and alternative planning strategy, if any. The metropolitan planning organization may conduct only one informational meeting if it is attended by representatives of the county board of supervisors and city council members representing a majority of the cities representing a majority of the population in the incorporated areas of that county. Notice of the meeting or meetings shall be sent to the clerk of the board of supervisors and to each city clerk. The purpose of the meeting or meetings shall be to discuss the sustainable communities strategy and the alternative planning strategy, if any, including the key land use and planning assumptions to the members of the board of supervisors and the city council members in that county and to solicit and consider their input and recommendations.

(F) Each metropolitan planning organization shall adopt a public participation plan, for development of the sustainable communities strategy and an alternative planning strategy, if any, that includes all of the following:

(i) Outreach efforts to encourage the active participation of a broad range of stakeholder groups in the planning process, consistent with the agency's adopted Federal Public Participation Plan, including, but not limited to, affordable housing advocates, transportation advocates, neighborhood and community groups, environmental advocates, home builder representatives, broad-based business organizations, landowners, commercial property interests, and homeowner associations.

(ii) Consultation with congestion management agencies, transportation agencies, and transportation commissions.

(iii) Workshops throughout the region to provide the public with the information and tools necessary to provide a clear understanding of the issues and policy choices. At least one workshop shall be held in each county in the region. For counties with a population greater than 500,000, at least three workshops shall be held. Each

workshop, to the extent practicable, shall include urban simulation computer modeling to create visual representations of the sustainable communities strategy and the alternative planning strategy.

(iv) Preparation and circulation of a draft sustainable communities strategy and an alternative planning strategy, if one is prepared, not less than 55 days before adoption of a final regional transportation plan.

(v) At least three public hearings on the draft sustainable communities strategy in the regional transportation plan and alternative planning strategy, if one is prepared. If the metropolitan transportation organization consists of a single county, at least two public hearings shall be held. To the maximum extent feasible, the hearings shall be in different parts of the region to maximize the opportunity for participation by members of the public throughout the region.

(vi) A process for enabling members of the public to provide a single request to receive notices, information, and updates.

(G) In preparing a sustainable communities strategy, the metropolitan planning organization shall consider spheres of influence that have been adopted by the local agency formation commissions within its region.

(H) Before adopting a sustainable communities strategy, the metropolitan planning organization shall quantify the reduction in greenhouse gas emissions projected to be achieved by the sustainable communities strategy and set forth the difference, if any, between the amount of that reduction and the target for the region established by the state board.

(I) If the sustainable communities strategy, prepared in compliance with subparagraph (B) or (D), is unable to reduce greenhouse gas emissions to achieve the greenhouse gas emission reduction targets established by the state board, the metropolitan planning organization shall prepare an alternative planning strategy to the sustainable communities strategy showing how those greenhouse gas emission targets would be achieved through alternative development patterns, infrastructure, or additional transportation measures or policies. The alternative planning strategy shall be a separate document from the regional transportation plan, but it may be adopted concurrently with the regional transportation plan. In preparing the alternative planning strategy, the metropolitan planning organization:

(i) Shall identify the principal impediments to achieving the targets within the sustainable communities strategy.

(ii) May include an alternative development pattern for the region pursuant to subparagraphs (B) to (G), inclusive.

(iii) Shall describe how the greenhouse gas emission reduction targets would be achieved by the alternative planning strategy, and why the development pattern, measures, and policies in the alternative planning strategy are the most practicable choices for achievement of the greenhouse gas emission reduction targets.

(iv) An alternative development pattern set forth in the alternative planning strategy shall comply with Part 450 of Title 23 of, and Part 93 of Title 40 of, the Code of Federal Regulations, except to the extent that compliance will prevent achievement of the greenhouse gas emission reduction targets approved by the state board.

(v) For purposes of the California Environmental Quality Act (Division 13 (commencing with Section 21000) of the Public Resources Code), an alternative planning strategy shall not constitute a land use plan, policy, or regulation, and the inconsistency of a project with an alternative planning strategy shall not be a consideration in determining whether a project may have an environmental effect.

(J) (i) Before starting the public participation process adopted pursuant to subparagraph (F), the metropolitan planning organization shall submit a description to the state board of the technical methodology it intends to use to estimate the greenhouse gas emissions from its sustainable communities strategy and, if appropriate, its alternative planning strategy. The state board shall respond to the metropolitan planning organization in a timely manner with written comments about the technical methodology, including specifically describing any aspects of that methodology it concludes will not yield accurate estimates of greenhouse gas emissions, and suggested remedies. The metropolitan planning organization is encouraged to work with the state board until the state board concludes that the technical methodology operates accurately.

(ii) After adoption, a metropolitan planning organization shall submit a sustainable communities strategy or an alternative planning strategy, if one has been adopted, to the state board for review, including the quantification of the greenhouse gas emission reductions the strategy would achieve and a description of the technical methodology used to obtain that result. Review by the state board shall be limited to acceptance or rejection of the metropolitan planning organization's determination that the strategy submitted would, if implemented, achieve the greenhouse gas emission reduction targets established by the state board. The state board shall complete its review within 60 days.

(iii) If the state board determines that the strategy submitted would not, if implemented, achieve the greenhouse gas emission reduction targets, the metropolitan planning organization shall revise its strategy or adopt an alternative planning strategy, if not previously adopted, and submit the strategy for review pursuant to clause (ii). At a minimum, the metropolitan planning organization must obtain state board acceptance that an alternative planning strategy would, if implemented, achieve the greenhouse gas emission reduction targets established for that region by the state board.

(iv) On or before September 1, 2018, and every four years thereafter to align with target setting, notwithstanding Section 10231.5, the state board shall prepare a report that assesses progress made by each metropolitan planning organization in meeting the regional greenhouse gas emission reduction targets set by the state board. The report shall include changes to greenhouse gas emissions in each region and data-supported metrics for the strategies used to meet the targets. The report shall also include a discussion of best practices and the challenges faced by the metropolitan planning organizations in meeting the targets, including the effect of state policies and funding. The report shall be developed in consultation with the metropolitan planning organizations and affected stakeholders. The report shall be submitted to the Assembly Committee on Transportation and the Assembly Committee on Natural



Resources, and to the Senate Committee on Transportation, the Senate Committee on Housing, and the Senate Committee on Environmental Quality.

(K) Neither a sustainable communities strategy nor an alternative planning strategy regulates the use of land, nor, except as provided by subparagraph (J), shall either one be subject to any state approval. Nothing in a sustainable communities strategy shall be interpreted as superseding the exercise of the land use authority of cities and counties within the region. Nothing in this section shall be interpreted to limit the state board's authority under any other law. Nothing in this section shall be interpreted to authorize the abrogation of any vested right whether created by statute or by common law. Nothing in this section shall require a city's or county's land use policies and regulations, including its general plan, to be consistent with the regional transportation plan or an alternative planning strategy. Nothing in this section requires a metropolitan planning organization to approve a sustainable communities strategy that would be inconsistent with Part 450 of Title 23 of, or Part 93 of Title 40 of, the Code of Federal Regulations and any administrative guidance under those regulations. Nothing in this section relieves a public or private entity or any person from compliance with any other local, state, or federal law.

(L) Nothing in this section requires projects programmed for funding on or before December 31, 2011, to be subject to the provisions of this paragraph if they (i) are contained in the 2007 or 2009 Federal Statewide Transportation Improvement Program, (ii) are funded pursuant to the Highway Safety, Traffic Reduction, Air Quality, and Port Security Bond Act of 2006 (Chapter 12.49 (commencing with Section 8879.20) of Division 1 of Title 2), or (iii) were specifically listed in a ballot measure before December 31, 2008, approving a sales tax increase for transportation projects. Nothing in this section shall require a transportation sales tax authority to change the funding allocations approved by the voters for categories of transportation projects in a sales tax measure adopted before December 31, 2010. For purposes of this subparagraph, a transportation sales tax authority is a district, as defined in Section 7252 of the Revenue and Taxation Code, that is authorized to impose a sales tax for transportation purposes.

(M) A metropolitan planning organization, or a regional transportation planning agency not within a metropolitan planning organization, that is required to adopt a regional transportation plan not less than every five years, may elect to adopt the plan not less than every four years. This election shall be made by the board of directors of the metropolitan planning organization or regional transportation planning agency no later than June 1, 2009, or thereafter 54 months before the statutory deadline for the adoption of housing elements for the local jurisdictions within the region, after a public hearing at which comments are accepted from members of the public and representatives of cities and counties within the region covered by the metropolitan planning organization or regional transportation planning agency. Notice of the public hearing shall be given to the general public and by mail to cities and counties within the region no later than 30 days before the date of the public hearing. Notice of election shall be promptly given to the Department of Housing and Community Development. The metropolitan planning organization or the regional transportation planning agency

shall complete its next regional transportation plan within three years of the notice of election.

(N) Two or more of the metropolitan planning organizations for Fresno County, Kern County, Kings County, Madera County, Merced County, San Joaquin County, Stanislaus County, and Tulare County may work together to develop and adopt multiregional goals and policies that may address interregional land use, transportation, economic, air quality, and climate relationships. The participating metropolitan planning organizations may also develop a multiregional sustainable communities strategy, to the extent consistent with federal law, or an alternative planning strategy for adoption by the metropolitan planning organizations. Each participating metropolitan planning organization shall consider any adopted multiregional goals and policies in the development of a sustainable communities strategy and, if applicable, an alternative planning strategy for its region.

(3) An action element that describes the programs and actions necessary to implement the plan and assigns implementation responsibilities. The action element may describe all transportation projects proposed for development during the 20-year or greater life of the plan. The action element shall consider congestion management programming activities carried out within the region.

(4) (A) A financial element that summarizes the cost of plan implementation constrained by a realistic projection of available revenues. The financial element shall also contain recommendations for allocation of funds. A county transportation commission created pursuant to the County Transportation Commissions Act (Division 12 (commencing with Section 130000) of the Public Utilities Code) shall be responsible for recommending projects to be funded with regional improvement funds, if the project is consistent with the regional transportation plan. The first five years of the financial element shall be based on the five-year estimate of funds developed pursuant to Section 14524. The financial element may recommend the development of specified new sources of revenue, consistent with the policy element and action element.

(B) The financial element of transportation planning agencies with populations that exceed 200,000 persons may include a project cost breakdown for all projects proposed for development during the 20-year life of the plan that includes total expenditures and related percentages of total expenditures for all of the following:

- (i) State highway expansion.
- (ii) State highway rehabilitation, maintenance, and operations.
- (iii) Local road and street expansion.
- (iv) Local road and street rehabilitation, maintenance, and operation.
- (v) Mass transit, commuter rail, and intercity rail expansion.
- (vi) Mass transit, commuter rail, and intercity rail rehabilitation, maintenance, and operations.
- (vii) Pedestrian and bicycle facilities.
- (viii) Environmental enhancements and mitigation.
- (ix) Research and planning.
- (x) Other categories.

(C) The metropolitan planning organization or county transportation agency, whichever entity is appropriate, shall consider financial incentives for cities and counties that have resource areas or farmland, as defined in Section 65080.01, for the purposes of, for example, transportation investments for the preservation and safety of the city street or county road system and farm-to-market and interconnectivity transportation needs. The metropolitan planning organization or county transportation agency, whichever entity is appropriate, shall also consider financial assistance for counties to address countywide service responsibilities in counties that contribute toward the greenhouse gas emission reduction targets by implementing policies for growth to occur within their cities.

(c) Each transportation planning agency may also include other factors of local significance as an element of the regional transportation plan, including, but not limited to, issues of mobility for specific sectors of the community, including, but not limited to, senior citizens.

(d) (1) Except as otherwise provided in this subdivision, each transportation planning agency shall adopt and submit, every four years, an updated regional transportation plan to the California Transportation Commission and the Department of Transportation. A transportation planning agency located in a federally designated air quality attainment area or that does not contain an urbanized area may at its option adopt and submit a regional transportation plan every five years. When applicable, the plan shall be consistent with federal planning and programming requirements and shall conform to the regional transportation plan guidelines adopted by the California Transportation Commission. Before adoption of the regional transportation plan, a public hearing shall be held after the giving of notice of the hearing by publication in the affected county or counties pursuant to Section 6061.

(2) (A) Notwithstanding subdivisions (b) and (c), and paragraph (1), inclusive, the regional transportation plan, sustainable communities strategy, and environmental impact report adopted by the San Diego Association of Governments on October 9, 2015, shall remain in effect for all purposes, including for purposes of consistency determinations and funding eligibility for the San Diego Association of Governments and all other agencies relying on those documents, until the San Diego Association of Governments adopts its next update to its regional transportation plan.

(B) The San Diego Association of Governments shall adopt and submit its update to the 2015 regional transportation plan on or before December 31, 2021.

(C) After the update described in subparagraph (B), the time period for San Diego Association of Governments' updates to its regional transportation plan shall be reset and shall be adopted and submitted every four years.

(D) Notwithstanding clause (iv) of subparagraph (A) of paragraph (2) of subdivision (b), the State Air Resources Board shall not update the greenhouse gas emission reduction targets for the region within the jurisdiction of the San Diego Association of Governments before the adoption of the update to the regional transportation plan pursuant to subparagraph (B).

(E) The update to the regional transportation plan adopted by the San Diego Association of Governments on October 9, 2015, which will be prepared and submitted

to federal agencies for purposes of compliance with federal laws applicable to regional transportation plans and air quality conformity and which is due in October 2019, shall not be considered a regional transportation plan pursuant to this section and shall not constitute a project for purposes of the California Environmental Quality Act (Division 13 (commencing with Section 21000) of the Public Resources Code).

(F) In addition to meeting the other requirements to nominate a project for funding through the Solutions for Congested Corridors Program (Chapter 8.5 (commencing with Section 2390) of Division 3 of the Streets and Highways Code), the San Diego Association of Governments, until December 31, 2021, shall only nominate projects for funding through the Solutions for Congested Corridors Program that are consistent with the eligibility requirements for projects under any of the following programs:

(i) The Transit and Intercity Rail Capital Program (Part 2 (commencing with Section 75220) of Division 44 of the Public Resources Code).

(ii) The Low Carbon Transit Operations Program (Part 3 (commencing with Section 75230) of Division 44 of the Public Resources Code).

(iii) The Active Transportation Program (Chapter 8 (commencing with Section 2380) of Division 3 of the Streets and Highways Code).

(G) Commencing January 1, 2020, and every two years thereafter, the San Diego Association of Governments shall begin developing an implementation report that tracks the implementation of its most recently adopted sustainable communities strategy. The report shall discuss the status of the implementation of the strategy at the regional and local level, and any successes and barriers that have occurred since the last report. The San Diego Association of Governments shall submit the implementation report to the state board by including it in its sustainable communities strategy implementation review pursuant to clause (ii) of subparagraph (J) of paragraph (2) of subdivision (b).

(Amended by Stats. 2019, Ch. 634, Sec. 2. (AB 1730) Effective January 1, 2020.)

**State of California**

**GOVERNMENT CODE**

**Section 65584**

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65584. (a) (1) For the fourth and subsequent revisions of the housing element pursuant to Section 65588, the department shall determine the existing and projected need for housing for each region pursuant to this article. For purposes of subdivision (a) of Section 65583, the share of a city or county of the regional housing need shall include that share of the housing need of persons at all income levels within the area significantly affected by the general plan of the city or county.

(2) It is the intent of the Legislature that cities, counties, and cities and counties should undertake all necessary actions to encourage, promote, and facilitate the development of housing to accommodate the entire regional housing need, and reasonable actions should be taken by local and regional governments to ensure that future housing production meets, at a minimum, the regional housing need established for planning purposes. These actions shall include applicable reforms and incentives in Section 65582.1.

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

(b) The department, in consultation with each council of governments, shall determine each region's existing and projected housing need pursuant to Section 65584.01 at least two years prior to the scheduled revision required pursuant to Section 65588. The appropriate council of governments, or for cities and counties without a council of governments, the department, shall adopt a final regional housing need plan that allocates a share of the regional housing need to each city, county, or city and county at least one year prior to the scheduled revision for the region required by Section 65588. The allocation plan prepared by a council of governments shall be prepared pursuant to Sections 65584.04 and 65584.05.

(c) Notwithstanding any other provision of law, the due dates for the determinations of the department or for the council of governments, respectively, regarding the regional housing need may be extended by the department by not more than 60 days if the extension will enable access to more recent critical population or housing data from a pending or recent release of the United States Census Bureau or the Department of Finance. If the due date for the determination of the department or the council of governments is extended for this reason, the department shall extend the corresponding

housing element revision deadline pursuant to Section 65588 by not more than 60 days.

(d) The regional housing needs allocation plan shall further all of the following objectives:

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

(2) Promoting infill development and socioeconomic equity, the protection of environmental and agricultural resources, the encouragement of efficient development patterns, and the achievement of the region's greenhouse gas reductions targets provided by the State Air Resources Board pursuant to Section 65080.

(3) Promoting an improved intraregional relationship between jobs and housing, including an improved balance between the number of low-wage jobs and the number of housing units affordable to low-wage workers in each jurisdiction.

(4) Allocating a lower proportion of housing need to an income category when a jurisdiction already has a disproportionately high share of households in that income category, as compared to the countywide distribution of households in that category from the most recent American Community Survey.

(5) Affirmatively furthering fair housing.

(e) For purposes of this section, "affirmatively furthering fair housing" means taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics. Specifically, affirmatively furthering fair housing means taking meaningful actions that, taken together, address significant disparities in housing needs and in access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws.

(f) For purposes of this section, "household income levels" are as determined by the department as of the most recent American Community Survey pursuant to the following code sections:

(1) Very low incomes as defined by Section 50105 of the Health and Safety Code.

(2) Lower incomes, as defined by Section 50079.5 of the Health and Safety Code.

(3) Moderate incomes, as defined by Section 50093 of the Health and Safety Code.

(4) Above moderate incomes are those exceeding the moderate-income level of Section 50093 of the Health and Safety Code.

(g) Notwithstanding any other provision of law, determinations made by the department, a council of governments, or a city or county pursuant to this section or Section 65584.01, 65584.02, 65584.03, 65584.04, 65584.05, 65584.06, 65584.07, or

65584.08 are exempt from the California Environmental Quality Act (Division 13 (commencing with Section 21000) of the Public Resources Code).

(Amended by Stats. 2018, Ch. 989, Sec. 1.5. (AB 1771) Effective January 1, 2019.)

**State of California**

**GOVERNMENT CODE**

**Section 65584.04**

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65584.04. (a) At least two years before a scheduled revision required by Section 65588, each council of governments, or delegate subregion as applicable, shall develop, in consultation with the department, a proposed methodology for distributing the existing and projected regional housing need to cities, counties, and cities and counties within the region or within the subregion, where applicable pursuant to this section. The methodology shall further the objectives listed in subdivision (d) of Section 65584.

(b) (1) No more than six months before the development of a proposed methodology for distributing the existing and projected housing need, each council of governments shall survey each of its member jurisdictions to request, at a minimum, information regarding the factors listed in subdivision (e) that will allow the development of a methodology based upon the factors established in subdivision (e).

(2) With respect to the objective in paragraph (5) of subdivision (d) of Section 65584, the survey shall review and compile information that will allow the development of a methodology based upon the issues, strategies, and actions that are included, as available, in an Analysis of Impediments to Fair Housing Choice or an Assessment of Fair Housing completed by any city or county or the department that covers communities within the area served by the council of governments, and in housing elements adopted pursuant to this article by cities and counties within the area served by the council of governments.

(3) The council of governments shall seek to obtain the information in a manner and format that is comparable throughout the region and utilize readily available data to the extent possible.

(4) The information provided by a local government pursuant to this section shall be used, to the extent possible, by the council of governments, or delegate subregion as applicable, as source information for the methodology developed pursuant to this section. The survey shall state that none of the information received may be used as a basis for reducing the total housing need established for the region pursuant to Section 65584.01.

(5) If the council of governments fails to conduct a survey pursuant to this subdivision, a city, county, or city and county may submit information related to the items listed in subdivision (e) before the public comment period provided for in subdivision (d).

(c) The council of governments shall electronically report the results of the survey of fair housing issues, strategies, and actions compiled pursuant to paragraph (2) of subdivision (b). The report shall describe common themes and effective strategies



employed by cities and counties within the area served by the council of governments, including common themes and effective strategies around avoiding the displacement of lower income households. The council of governments shall also identify significant barriers to affirmatively furthering fair housing at the regional level and may recommend strategies or actions to overcome those barriers. A council of governments or metropolitan planning organization, as appropriate, may use this information for any other purpose, including publication within a regional transportation plan adopted pursuant to Section 65080 or to inform the land use assumptions that are applied in the development of a regional transportation plan.

(d) Public participation and access shall be required in the development of the methodology and in the process of drafting and adoption of the allocation of the regional housing needs. Participation by organizations other than local jurisdictions and councils of governments shall be solicited in a diligent effort to achieve public participation of all economic segments of the community as well as members of protected classes under Section 12955. The proposed methodology, along with any relevant underlying data and assumptions, an explanation of how information about local government conditions gathered pursuant to subdivision (b) has been used to develop the proposed methodology, how each of the factors listed in subdivision (e) is incorporated into the methodology, and how the proposed methodology furthers the objectives listed in subdivision (e) of Section 65584, shall be distributed to all cities, counties, any subregions, and members of the public who have made a written or electronic request for the proposed methodology and published on the council of governments', or delegate subregion's, internet website. The council of governments, or delegate subregion, as applicable, shall conduct at least one public hearing to receive oral and written comments on the proposed methodology.

(e) To the extent that sufficient data is available from local governments pursuant to subdivision (b) or other sources, each council of governments, or delegate subregion as applicable, shall include the following factors to develop the methodology that allocates regional housing needs:

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

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

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

(B) The availability of land suitable for urban development or for conversion to residential use, the availability of underutilized land, and opportunities for infill

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

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

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

(3) The distribution of household growth assumed for purposes of a comparable period of regional transportation plans and opportunities to maximize the use of public transportation and existing transportation infrastructure.

(4) Agreements between a county and cities in a county to direct growth toward incorporated areas of the county and land within an unincorporated area zoned or designated for agricultural protection or preservation that is subject to a local ballot measure that was approved by the voters of the jurisdiction that prohibits or restricts conversion to nonagricultural uses.

(5) The loss of units contained in assisted housing developments, as defined in paragraph (9) of subdivision (a) of Section 65583, that changed to non-low-income use through mortgage prepayment, subsidy contract expirations, or termination of use restrictions.

(6) The percentage of existing households at each of the income levels listed in subdivision (e) of Section 65584 that are paying more than 30 percent and more than 50 percent of their income in rent.

(7) The rate of overcrowding.

(8) The housing needs of farmworkers.

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

(10) The housing needs of individuals and families experiencing homelessness. If a council of governments has surveyed each of its member jurisdictions pursuant to subdivision (b) on or before January 1, 2020, this paragraph shall apply only to the

development of methodologies for the seventh and subsequent revisions of the housing element.

(11) The loss of units during a state of emergency that was declared by the Governor pursuant to the California Emergency Services Act (Chapter 7 (commencing with Section 8550) of Division 1 of Title 2), during the planning period immediately preceding the relevant revision pursuant to Section 65588 that have yet to be rebuilt or replaced at the time of the analysis.

(12) The region's greenhouse gas emissions targets provided by the State Air Resources Board pursuant to Section 65080.

(13) Any other factors adopted by the council of governments, that further the objectives listed in subdivision (d) of Section 65584, provided that the council of governments specifies which of the objectives each additional factor is necessary to further. The council of governments may include additional factors unrelated to furthering the objectives listed in subdivision (d) of Section 65584 so long as the additional factors do not undermine the objectives listed in subdivision (d) of Section 65584 and are applied equally across all household income levels as described in subdivision (f) of Section 65584 and the council of governments makes a finding that the factor is necessary to address significant health and safety conditions.

(f) The council of governments, or delegate subregion, as applicable, shall explain in writing how each of the factors described in subdivision (e) was incorporated into the methodology and how the methodology furthers the objectives listed in subdivision (d) of Section 65584. The methodology may include numerical weighting. This information, and any other supporting materials used in determining the methodology, shall be posted on the council of governments', or delegate subregion's, internet website.

(g) The following criteria shall not be a justification for a determination or a reduction in a jurisdiction's share of the regional housing need:

(1) Any ordinance, policy, voter-approved measure, or standard of a city or county that directly or indirectly limits the number of residential building permits issued by a city or county.

(2) Prior underproduction of housing in a city or county from the previous regional housing need allocation, as determined by each jurisdiction's annual production report submitted pursuant to subparagraph (H) of paragraph (2) of subdivision (a) of Section 65400.

(3) Stable population numbers in a city or county from the previous regional housing needs cycle.

(h) Following the conclusion of the public comment period described in subdivision (d) on the proposed allocation methodology, and after making any revisions deemed appropriate by the council of governments, or delegate subregion, as applicable, as a result of comments received during the public comment period, and as a result of consultation with the department, each council of governments, or delegate subregion, as applicable, shall publish a draft allocation methodology on its internet website and submit the draft allocation methodology, along with the information required pursuant to subdivision (e), to the department.

(i) Within 60 days, the department shall review the draft allocation methodology and report its written findings to the council of governments, or delegate subregion, as applicable. In its written findings the department shall determine whether the methodology furthers the objectives listed in subdivision (d) of Section 65584. If the department determines that the methodology is not consistent with subdivision (d) of Section 65584, the council of governments, or delegate subregion, as applicable, shall take one of the following actions:

(1) Revise the methodology to further the objectives listed in subdivision (d) of Section 65584 and adopt a final regional, or subregional, housing need allocation methodology.

(2) Adopt the regional, or subregional, housing need allocation methodology without revisions and include within its resolution of adoption findings, supported by substantial evidence, as to why the council of governments, or delegate subregion, believes that the methodology furthers the objectives listed in subdivision (d) of Section 65584 despite the findings of the department.

(j) If the department's findings are not available within the time limits set by subdivision (i), the council of governments, or delegate subregion, may act without them.

(k) Upon either action pursuant to subdivision (i), the council of governments, or delegate subregion, shall provide notice of the adoption of the methodology to the jurisdictions within the region, or delegate subregion, as applicable, and to the department, and shall publish the adopted allocation methodology, along with its resolution and any adopted written findings, on its internet website.

(l) The department may, within 90 days, review the adopted methodology and report its findings to the council of governments, or delegate subregion.

(m) (1) It is the intent of the Legislature that housing planning be coordinated and integrated with the regional transportation plan. To achieve this goal, the allocation plan shall allocate housing units within the region consistent with the development pattern included in the sustainable communities strategy.

(2) The final allocation plan shall ensure that the total regional housing need, by income category, as determined under Section 65584, is maintained, and that each jurisdiction in the region receive an allocation of units for low- and very low income households.

(3) The resolution approving the final housing need allocation plan shall demonstrate that the plan is consistent with the sustainable communities strategy in the regional transportation plan and furthers the objectives listed in subdivision (d) of Section 65584.

(Amended (as amended by Stats. 2018, Ch. 990, Sec. 3.7) by Stats. 2019, Ch. 335, Sec. 4. (AB 139) Effective January 1, 2020.)

**State of California**

**GOVERNMENT CODE**

**Section 65584.05**

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65584.05. (a) At least one and one-half years before the scheduled revision required by Section 65588, each council of governments and delegate subregion, as applicable, shall distribute a draft allocation of regional housing needs to each local government in the region or subregion, where applicable, and the department, based on the methodology adopted pursuant to Section 65584.04 and shall publish the draft allocation on its internet website. The draft allocation shall include the underlying data and methodology on which the allocation is based, and a statement as to how it furthers the objectives listed in subdivision (d) of Section 65584. It is the intent of the Legislature that the draft allocation should be distributed before the completion of the update of the applicable regional transportation plan. The draft allocation shall distribute to localities and subregions, if any, within the region the entire regional housing need determined pursuant to Section 65584.01 or within subregions, as applicable, the subregion's entire share of the regional housing need determined pursuant to Section 65584.03.

(b) Within 45 days following receipt of the draft allocation, a local government within the region or the delegate subregion, as applicable, or the department may appeal to the council of governments or the delegate subregion for a revision of the share of the regional housing need proposed to be allocated to one or more local governments. Appeals shall be based upon comparable data available for all affected jurisdictions and accepted planning methodology, and supported by adequate documentation, and shall include a statement as to why the revision is necessary to further the intent of the objectives listed in subdivision (d) of Section 65584. An appeal pursuant to this subdivision shall be consistent with, and not to the detriment of, the development pattern in an applicable sustainable communities strategy developed pursuant to paragraph (2) of subdivision (b) of Section 65080. Appeals shall be limited to any of the following circumstances:

(1) The council of governments or delegate subregion, as applicable, failed to adequately consider the information submitted pursuant to subdivision (b) of Section 65584.04.

(2) The council of governments or delegate subregion, as applicable, failed to determine the share of the regional housing need in accordance with the information described in, and the methodology established pursuant to, Section 65584.04, and in a manner that furthers, and does not undermine, the intent of the objectives listed in subdivision (d) of Section 65584.

(3) A significant and unforeseen change in circumstances has occurred in the local jurisdiction or jurisdictions that merits a revision of the information submitted pursuant

to subdivision (b) of Section 65584.04. Appeals on this basis shall only be made by the jurisdiction or jurisdictions where the change in circumstances has occurred.

(c) At the close of the period for filing appeals pursuant to subdivision (b), the council of governments or delegate subregion, as applicable, shall notify all other local governments within the region or delegate subregion and the department of all appeals and shall make all materials submitted in support of each appeal available on a publicly available internet website. Local governments and the department may, within 45 days, comment on one or more appeals. If no appeals are filed, the draft allocation shall be issued as the proposed final allocation plan pursuant to paragraph (2) of subdivision (e).

(d) No later than 30 days after the close of the comment period, and after providing all local governments within the region or delegate subregion, as applicable, at least 21 days prior notice, the council of governments or delegate subregion shall conduct one public hearing to consider all appeals filed pursuant to subdivision (b) and all comments received pursuant to subdivision (c).

(e) No later than 45 days after the public hearing pursuant to subdivision (d), the council of governments or delegate subregion, as applicable, shall do both of the following:

(1) Make a final determination that either accepts, rejects, or modifies each appeal for a revised share filed pursuant to subdivision (b). Final determinations shall be based upon the information and methodology described in Section 65584.04 and whether the revision is necessary to further the objectives listed in subdivision (d) of Section 65584. The final determination shall be in writing and shall include written findings as to how the determination is consistent with this article. The final determination on an appeal may require the council of governments or delegate subregion, as applicable, to adjust the share of the regional housing need allocated to one or more local governments that are not the subject of an appeal.

(2) Issue a proposed final allocation plan.

(f) In the proposed final allocation plan, the council of governments or delegate subregion, as applicable, shall adjust allocations to local governments based upon the results of the appeals process. If the adjustments total 7 percent or less of the regional housing need determined pursuant to Section 65584.01, or, as applicable, total 7 percent or less of the subregion's share of the regional housing need as determined pursuant to Section 65584.03, then the council of governments or delegate subregion, as applicable, shall distribute the adjustments proportionally to all local governments. If the adjustments total more than 7 percent of the regional housing need, then the council of governments or delegate subregion, as applicable, shall develop a methodology to distribute the amount greater than the 7 percent to local governments. The total distribution of housing need shall not equal less than the regional housing need, as determined pursuant to Section 65584.01, nor shall the subregional distribution of housing need equal less than its share of the regional housing need as determined pursuant to Section 65584.03.

(g) Within 45 days after the issuance of the proposed final allocation plan by the council of governments and each delegate subregion, as applicable, the council of

governments shall hold a public hearing to adopt a final allocation plan. To the extent that the final allocation plan fully allocates the regional share of statewide housing need, as determined pursuant to Section 65584.01 and has taken into account all appeals, the council of governments shall have final authority to determine the distribution of the region's existing and projected housing need as determined pursuant to Section 65584.01. The council of governments shall submit its final allocation plan to the department within three days of adoption. Within 30 days after the department's receipt of the final allocation plan adopted by the council of governments, the department shall determine if the final allocation plan is consistent with the existing and projected housing need for the region, as determined pursuant to Section 65584.01. The department may revise the determination of the council of governments if necessary to obtain this consistency.

(h) Any authority of the council of governments to review and revise the share of a city or county of the regional housing need under this section shall not constitute authority to revise, approve, or disapprove the manner in which the share of the city or county of the regional housing need is implemented through its housing program.

(i) Any time period in subdivision (d) or (e) may be extended by a council of governments or delegate subregion, as applicable, for up to 30 days.

(j) The San Diego Association of Governments may follow the process in this section for the draft and final allocation plan for the sixth revision of the housing element notwithstanding such actions being carried out before the adoption of an updated regional transportation plan and sustainable communities strategy.

(Amended by Stats. 2019, Ch. 634, Sec. 4. (AB 1730) Effective January 1, 2020.)

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## RHNA SUBCOMMITTEE CHARTER – 6<sup>th</sup> Cycle

Page 1 of 2

### **Purpose of the Subcommittee**

The purpose of the RHNA Subcommittee is to review in-depth the various policy considerations necessary to the development of SCAG's Regional Housing Needs Assessment (RHNA), and to make critical decisions throughout the RHNA process, including but not limited to the following: the RHNA methodology, the draft and final RHNA allocations, and appeals related to draft RHNA allocations. The decisions of the RHNA Subcommittee will serve as recommendations to SCAG's Community, Economic and Human Development (CEHD) Committee and the Regional Council, except that the RHNA Subcommittee will make the final decisions regarding all appeals of draft RHNA allocations.

### **Authority**

Authorized by the Regional Council, the RHNA Subcommittee serves as a subcommittee of the CEHD Committee, and will be reporting to the CEHD Committee. All actions by the RHNA Subcommittee, except for actions pertaining to appeals of draft RHNA allocations, are subject to the review and approval of the CEHD Committee and the Regional Council. Recognizing the significant amount of work undertaken by the RHNA Subcommittee, the CEHD Committee and the Regional Council will rely on the policy judgments of the RHNA Subcommittee. The RHNA Subcommittee shall be dissolved as of the date in which the final RHNA allocation is adopted by the Regional Council.

### **Composition**

The RHNA Subcommittee will consist of twelve (12) members of the Regional Council or the CEHD Committee to represent the six (6) counties of the SCAG region. Each county shall have a primary member and an alternate member to serve on the RHNA Subcommittee. The SCAG President will appoint the members of the RHNA Subcommittee and will select one of the members to serve as the Chair of the RHNA Subcommittee. Membership of the RHNA Subcommittee may also include as non-voting members serving as stakeholder representatives appointed by the SCAG President.

### **Meetings and Voting**

The meetings of the RHNA Subcommittee will occur during the applicable period when SCAG is developing the RHNA. The RHNA Subcommittee shall have the authority to convene meetings as circumstances require. A meeting quorum shall be established when there is attendance by at least one representative (either a primary member or an alternate member) from each of the six (6) counties. Stakeholder representatives serving as non-voting members of the RHNA Subcommittee are not counted for purposes of establishing a meeting quorum.

All RHNA Subcommittee members are expected to attend each meeting, to the extent feasible. RHNA Subcommittee members may attend meetings by teleconference or video-conference. All meetings of the RHNA Subcommittee are subject to the Brown Act. The Chair of the RHNA Subcommittee shall preside over all meetings and the Subcommittee may select another

## RHNA SUBCOMMITTEE CHARTER – 6<sup>th</sup> Cycle

Page 2 of 2

Subcommittee member to serve as the Vice-Chair in the Chair’s absence. The RHNA Subcommittee will invite SCAG staff or others to attend meetings and provide pertinent information, as necessary. Meeting agendas will be prepared and provided in advance to RHNA Subcommittee members, along with appropriate briefing materials and reports, in accordance with the Brown Act. Minutes of each meeting will be prepared.

For purposes of voting, each county shall be entitled to one (1) vote to be cast by either the primary member or alternate member representing the respective county. In the event of a tie vote, the Chair of the Subcommittee may vote to break the tie except if the Chair of the Subcommittee has casted a vote as a Subcommittee member. In that exception, the Vice Chair of the Subcommittee may break the tie vote. In the case of an appeal submitted on behalf of a Subcommittee member’s individual local jurisdiction, the Subcommittee member may elect not to participate in the discussion and vote by the RHNA Subcommittee regarding such appeal.

### Responsibilities

The RHNA Subcommittee will carry out the following responsibilities:

- Review information useful to the development of the RHNA Plan;
- Review and make policy decisions related to the RHNA process including policies for the RHNA methodology, the RHNA methodology, and the draft and final RHNA allocations, and forward such decisions to the CEHD Committee for review and approval. In making its policy decisions, the RHNA Subcommittee should consider the integration of the RHNA with the Regional Transportation Plan/Sustainable Communities Strategy;
- Review and make decisions regarding guidelines for the RHNA process including guidelines related to subregional delegation, and forward such decisions to the CEHD Committee for review and approval; and
- Review and make the final decisions regarding appeals related to the jurisdiction’s draft RHNA allocation. In this capacity, the RHNA Subcommittee shall be known as the “RHNA Appeals Board.” These final decisions by the RHNA Appeals Board shall not reviewable by the CEHD Committee or by the Regional Council.

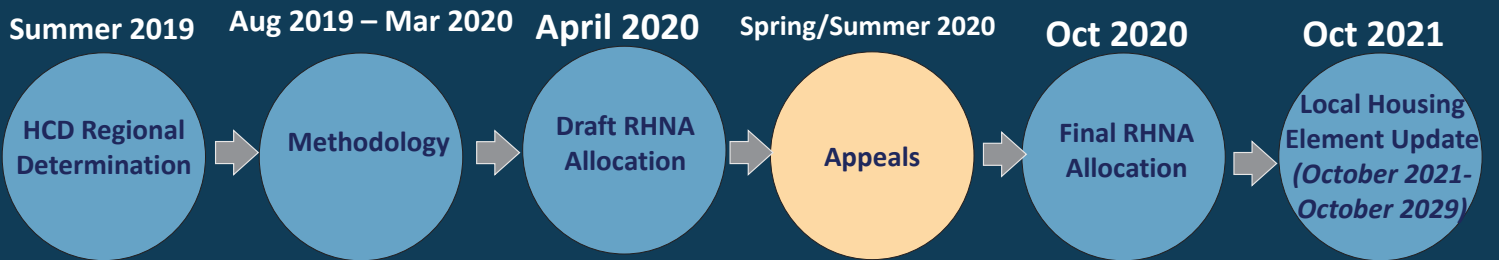
Attachment: Final RHNA Charter\_6th Cycle (Final RHNA Subcommittee Charter)

# RHNA Appeals Procedures

Ma'Ayn Johnson, AICP  
Compliance & Performance  
Monitoring




## RHNA Process Timeline



# Changes to the 6<sup>th</sup> Cycle RHNA Appeals Procedures





 New!	5 <sup>th</sup> cycle	6 <sup>th</sup> cycle
Appeals procedures	Two separate processes – revision request and appeals processes	Only one appeal process
Who can appeal	<ul style="list-style-type: none"> <li>• Jurisdiction</li> </ul>	<ul style="list-style-type: none"> <li>• Jurisdiction</li> <li>• Other jurisdictions</li> <li>• HCD</li> </ul>
Bases for appeal	Cannot be based on: <ul style="list-style-type: none"> <li>• Local ordinances</li> </ul>	Cannot be based on: <ul style="list-style-type: none"> <li>• Local ordinances</li> <li>• Underproduction of housing based on last RHNA</li> <li>• Stable population growth</li> </ul>

# RHNA Appeals Timeline



## Who Can File an Appeal?



- Jurisdiction
-  • Other jurisdictions
-  • California Department of Housing and Community Development (HCD)

## Bases for Appeal



*From Government Code Section 65584.05(b):*

1. Local planning factors and information on affirmatively furthering fair housing (AFFH)
2. Application of final methodology
3. Change in circumstance

Must include statement why the revision is necessary to further the objectives of RHNA law

- See Government Code Section 65584

## Government Code Section 65584: Objectives of RHNA



- 1) To increase the housing supply and mix of housing types, tenure and affordability within each region in an equitable manner
- 2) Promoting infill development and socioeconomic equity, the protection of environmental and agricultural resources, and the encouragement of efficient development patterns




- 3) Promoting an improved intraregional relationship between jobs and housing
- 4) Allocating a lower proportion of housing need in income categories in jurisdictions that have a disproportionately high share in comparison to the county distribution
- 5) Affirmatively furthering fair housing



## Bases for Appeal: Local Planning Factors and AFFH



1. Planning opportunities and constraints, including:
  - Existing and projected jobs and housing relationship
  - Water/sewer service based on decisions by provider other than the jurisdiction
  - Open space protected by federal or State programs
  - Rate of overcrowding
  - Presence of a four-year college or university
-  Affirmatively furthering fair housing
  - Full listing in Government Code Section 65584.04(b) and (e)



## Bases for Appeal: Methodology and Change in Circumstance



2. Application of methodology
3. Change in circumstance
  - Can only be used by jurisdiction where change occurred

## Bases for Appeal



- Appeals cannot be based on:
  - Any local ordinance, policy, voter-approved measure, or standard limiting residential development
-  Prior underproduction of housing from the previous RHNA
-  Stable population numbers

## Appeals Comment Period



- 45-day comment period after appeals filing due date
- Mid-May to end of June 2020
- SCAG will notify all jurisdictions and HCD of all filed appeals
  - Webpage posting of filed appeals
- Local jurisdictions and HCD can comment on filed appeals

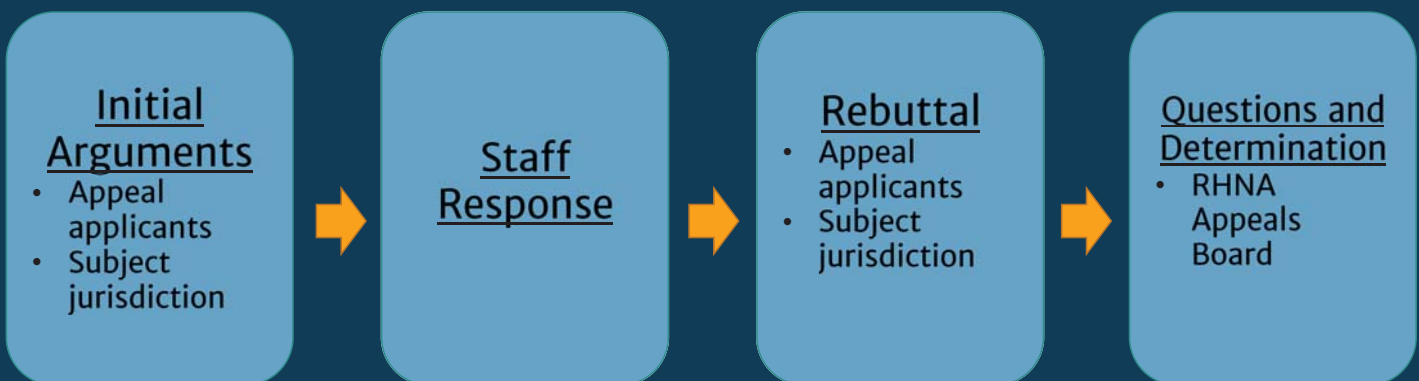


## Appeals Public Hearing



- July 2020 (30 day period)
- All filed appeals will be reviewed and determined by the RHNA Appeals Board (RHNA Subcommittee)
- Hearings will be organized by jurisdictions that are subjects of appeals

## Appeals Public Hearing: Day-of Procedure



## Appeals



- Successful appeals must be reallocated back to the region
- If fewer than 93,928 units are granted, they will be reallocated back proportionally to all jurisdictions
- If more than 93,928 units are granted, SCAG will apply a methodology similar to final methodology existing need formula (pending adoption) above that amount
  - Proportional to county origination
  - 50% based on transit access
  - 50% based on job access
  - Disadvantaged jurisdictions exempt from reallocation above ~94,000

## Final RHNA Allocation



- Appeal decisions by the RHNA Appeals Board are final and not subject to review by CEHD and Regional Council
- Reallocation of successful units cannot be appealed
- All appeals will be included in the proposed final RHNA allocation
- Public Hearing to adopt final RHNA allocation
  - October 2020

# Next Steps



February 24, 2020

- RHNA Subcommittee
- Final RHNA methodology
  - Appeals procedures

March 5, 2020

- CEHD
- Final RHNA methodology
  - Appeals procedures

- Regional Council
- Final RHNA methodology
  - Appeals procedures

April 2, 2020

- Regional Council
- Release of draft RHNA allocation

Early April, 2020

Start of RHNA appeal filing period

# POST-APPEAL REALLOCATION



## Post-appeal reallocation of regional housing need



- Regional Determination is 1,341,827 total units
- Regionally, this is greater than 20% the current housing stock\*
- HCD's determination did **not** provide a range. Units from successful appeals would have to go somewhere else.
- Post-appeal redistribution must still further RHNA's statutory objectives
  - HCD can appeal
  - HCD can comment on appeals
  - HCD reviews the Final Allocation Plan (post-appeals)

\*Per CA DOF E-5 estimates, as of 1/1/2019

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## For more information

[www.scag.ca.gov/rhna](http://www.scag.ca.gov/rhna)

Email: [housing@scag.ca.gov](mailto:housing@scag.ca.gov)





Southern California Association of Governments  
900 Wilshire Boulevard, Suite 1700, Los Angeles, California 90017  
**February 24, 2020**

**REGIONAL HOUSING NEEDS ASSESSMENT (RHNA) SUBCOMMITTEE  
OF THE  
SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS  
MINUTES OF THE MEETING  
OCTOBER 7, 2019**

**THE FOLLOWING MINUTES ARE A SUMMARY OF ACTIONS TAKEN BY THE RHNA SUBCOMMITTEE. AN AUDIO RECORDING OF THE ACTUAL MEETING IS AVAILABLE FOR LISTENING.**

The RHNA Subcommittee held its meeting at SCAG’s downtown Los Angeles office. A quorum was present.

**VOTING MEMBERS**

**Representing Imperial County**

Primary: Hon. Jim Predmore, Holtville Present -- via videoconference  
Alternate: Hon. Bill Hodge, Calexico Present – in-person (late)

**Representing Los Angeles County**

Primary: Margaret Finlay, Duarte Present – in-person  
Alternate: Hon. Rex Richardson, Long Beach Present – in-person (late)

**Representing Orange County**

Primary: Hon. Wendy Bucknum, Mission Viejo Present – in-person  
Alternate: CHAIR Peggy Huang, Yorba Linda, TCA Present – in-person

**Representing Riverside County**

Primary: Hon. Rusty Bailey, Riverside Present – via videoconference  
Alternate: Hon. Russell Betts, Desert Hot Springs Present – via videoconference

**Representing San Bernardino County**

Primary: Hon. Bill Jahn, Big Bear Lake Present – in-person  
Alternate: Hon. Jim Mulvihill, San Bernardino Present – in-person

**Representing Ventura County**

Primary: Hon. Carmen Ramirez, Oxnard Present – via teleconference (late)  
Alternate: Hon. Mike Judge, Simi Valley Absent

**NON-VOTING/EX-OFFICIO MEMBERS**

Academia: Paavo Monkkonen, UCLA Urban Planning Present – in-person  
Non-Profit/Advocate: Cesar Covarrubias, Kennedy Commission Present – in-person  
Building Industry: Jeff Montejano, BIA of Southern California Present – via teleconference

**OUR MISSION**

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### **CALL TO ORDER & PLEDGE OF ALLEGIANCE**

The Chair Peggy Huang called the meeting to order at 10:01 AM and asked Dr. Kevin Kane, SCAG Staff, to lead the Subcommittee in the Pledge of Allegiance.

### **PUBLIC COMMENT PERIOD**

President Bill Jahn, San Bernardino County, provided an opening statement in which he emphasized the importance of this 6<sup>th</sup> cycle of RHNA and the significant implications it will have across the SCAG region in the future. President Jahn reiterated that jurisdictions should not be solely focused on a methodology that will produce the lowest RHNA allocation number possible for their respective jurisdictions, and instead reminded everyone that the methodology chosen to be submitted to CEHD should be one that is beneficial for the entire region.

Joann Africa, Chief Legal Counsel, then briefly acknowledged comment letters received and addressed to the RHNA subcommittee. Ms. Africa informed that since the last RHNA Subcommittee meeting held on July 22, about 80 letters addressed to the RHNA Subcommittee regarding the proposed RHNA methodology options were received and reviewed by SCAG staff. Additionally, Ms. Africa wished to acknowledge three letters received that were not included in the agenda packet for the official record. These letters include ones received by the City of Fullerton dated August 28<sup>th</sup>, from the City of Corona dated September 3<sup>rd</sup>, and from the City of Murrieta dated September 5<sup>th</sup>.

### **REVIEW AND PRIORITIZE AGENDA ITEMS**

There was no prioritization of agenda items.

### **CONSTENT CALENDAR**

#### **Approval Item**

##### **1. Minutes of July 22, 2019 Meeting**

A MOTION was made (Primary Member Wendy Bucknum, Orange County) to approve the Minutes of the July 22, 2019 Meeting. The MOTION was SECONDED (President Bill Jahn, San Bernardino County) and APPROVED by the following votes:

**AYES:** Predmore (Imperial County), Finlay (Los Angeles County), Bucknum (Orange County), Bailey (Riverside County), Jahn (San Bernardino County), Ramirez (Ventura County) (6).

**NOES:** None (0).

**ABSTAIN:** None (0).

### **Receive and File**

2. RHNA Subcommittee Topic Outlook
3. Summary of Written Comments Received for the 6<sup>th</sup> Cycle RHNA
4. Objection Letter to the Regional Determination

A MOTION was made (Primary Member Wendy Bucknum, Orange County) to approve the Consent Calendar. The MOTION was SECONDED (President Bill Jahn, San Bernardino County) and APPROVED by the following votes:

**AYES:** Predmore (Imperial County), Finlay (Los Angeles County), Bucknum (Orange County), Bailey (Riverside County), Jahn (San Bernardino County), Ramirez (Ventura County) (6).

**NOES:** None (0).

**ABSTAIN:** None (0).

### **ACTION ITEM**

5. Recommended Draft RHNA Methodology

Kome Ajise, Executive Director of SCAG, provided context for the meeting and stated that the draft RHNA methodology was carefully developed after reviewing the numerous amount of public comments submitted previously regarding the other staff recommended methodology options, as well as comments received from HCD. Mr. Ajise stressed that the high volume of comments received has been an indicator in showcasing that many people find this 6<sup>th</sup> cycle RHNA to be of much importance and that SCAG has been committed to abiding to state statute by incorporating factors such as Affirmatively Furthering Fair Housing.

Mr. Ajise also stated that he believes there is a misunderstanding in the public comments he has seen regarding local input. He stated that local input is more than an aggregation of thoughts and needs from across the region, but is rather a complex foundational database developed by SCAG. Therefore, Mr. Ajise emphasized how local input cannot simply be disregarded as a factor in the proposed methodology as many public comments requested because of its importance and presence in a variety of other regional planning elements developed by SCAG.

Mr. Ajise announced the availability of the RHNA calculator tool in both Excel and PDF formats, and the ongoing development of a 'Frequently Asked Questions' webpage regarding the 6<sup>th</sup> cycle RHNA process. Mr. Ajise explained that the calculator tool should be used to inform users about what the RHNA methodology could do, but that it is a work in progress as SCAG staff expects to continually update the tool as needed to ensure more accuracy.

Ma'Ayn Johnson, SCAG staff, provided an overview of the different components of the staff recommended draft methodology, including projected need, existing need, and social equity adjustments. She also highlighted concepts that were developed as a result of the public comment process on the proposed methodology, including job accessibility and the concept of disadvantaged communities based on access to resources. The presentation also included a conceptual overview by Dr. Kevin Kane, SCAG staff, on each methodology component and concept.

#### **SUBCOMMITTEE MEMBER AND PUBLIC QUESTIONS**

Hon. Jim Predmore, Imperial County, expressed a concern about how the current Draft Methodology seems to favor areas with high amounts of job accessibility, but puts areas like Imperial County at a disadvantage because of low population. Hon. Predmore asked what is being done to help bring these jobs over.

Hon. Rusty Bailey, Riverside County, expressed his wish to look back on the objectives of RHNA to ensure that the Draft Methodology presented is in line with the objectives of RHNA. Hon. Bailey felt the Draft Methodology did not properly address or fulfill each RHNA objective and stated that approval of this Draft Methodology would damage public trust in SCAG.

Hon. Carmen Ramirez, Ventura County, questioned if there could be more time for jurisdictions to review parts of the Draft Methodology as some local planning staff felt confused over certain parts of it. Kome Ajise, Executive Director of SCAG, mentioned that this is something SCAG staff could address at the upcoming Technical Working Group meeting to be able to answer questions at a jurisdictional level.

Hon. Wendy Bucknum, Orange County, requested a simplified explanation for how the number of jobs accessible by auto commute was calculated. Dr. Kane explained that the numbers were derived



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from SCAG's 'activity based travel demand model' which looks at the number of jobs accessible rather than the number of jobs within a jurisdiction.

Hon. Laura Emdee, City of Redondo Beach, commented on the importance of needing more housing in the region to retain the younger generation workforce that's been shown to be leaving the state because of the lack of attainable housing. Hon. Emdee indicated that a Social Equity Adjustment that includes a jobs-housing ratio adjustment would be beneficial and would fulfill the RHNA objective of promoting an improved intraregional relationship between jobs and housing. Hon. Emdee also stated that HQTAs should be based on acreage and not population.

Marika Poynter, City of Irvine, expressed concerns about the limited time given to review several new factors included in the Staff Recommended RHNA Methodology. Ms. Poynter specifically expressed disagreement with the methodology used to obtain Transit Accessibility factors for the City of Irvine as it took into consideration a Bus Rapid Transit line proposed for construction along Interstate 5. Ms. Poynter stated that because there are no confirmed station stops within Irvine, it should not qualify as part of the HQTAs consideration.

Grace Peng, League of Women Voters LA County, expressed her concerns with the health and welfare of LA County residents as the result of the current proposed Draft RHNA Methodology, particular its heavy reliance on local input. Ms. Peng also expressed concerns with how the Draft Methodology should focus on developing in lower density areas that can be serviced by efficient transportation projects. Ms. Peng stated that HQTAs should be based on acreage instead of population to avoid displacing residents in the poorest jurisdictions.

Terry Luedecke, Abundant Housing LA, stressed the importance of reducing greenhouse gas outputs. Mr. Luedecke also advocated for reducing car usage by ensuring that cars and jobs are within close proximity of each other.

Rachel Forester, League of Women Voters Mt. Baldy Area, emphasized that the methodology should not be based on ensuring the lowest RHNA number to jurisdictions. Ms. Forester expressed that the methodology should aim to build the right housing in the right areas where jobs and transit exist to reduce car usage and subsequently allow families more money to pay for rent.

Jaime Murrillo, City of Newport Beach, pointed out that in combination with the high regional determination number given by HCD, the State has also changed housing element laws and constrained the type of sites that are able to count towards Housing Elements. Mr. Murrillo expressed concerns with the City's existing need being much higher than its projected need and asked for SCAG staff to reconsider the Social Equity Adjustment baseline of 150% as it is a much higher number than past cycles and would inequitably allocate housing units to certain income levels.

Leonora Camner, Abundant Housing LA, pointed out that the previous comment about RHNA needing to be consistent with other regional plans and the need for local inputs to be included goes against the objectives set forth for RHNA. Ms. Camner questioned how local inputs can help fulfill RHNA objectives and goals and gave examples of inequitable housing unit allocation derived from the inclusion of local inputs as well as how it could be more evened out with the exclusion of local input.

Connor Finney, California YIMBY, urged SCAG and Subcommittee members to choose a methodology that prioritizes dense, transit-oriented, in-fill development and deprioritizes a methodology that relies heavily on public input. Mr. Finney also stressed the importance of meeting climate change goals by reducing the amount of high commuters and car usage overall.

Eve Kaufman, Inclusive Claremont, emphasized the need on building more high density housing around transit-oriented areas to eliminate car costs.

Hon. Jed Leano, City of Claremont, provided an example using the City of Claremont to show that it would have been favorable to incorporate building permit activity to offset the City outpacing its growth and expressed hope for incorporating building permit activity for future cycles to help other jurisdictions with similar situations.

Daniel Inloes, City of Costa Mesa, expressed concerns that defining HQTAs with the incorporation of SB 375 is too broad and called for a more thoughtful approach to defining these areas. Mr. Inloes questioned the use of future population as a considering factor when talking about existing need and also voiced concerns that placing such a high emphasis on housing near jobs can reduce land available for company locations.

Hon. John Mirisch, City of Beverly Hills, advocated for protecting diverse communities from gentrification and displacement while also considering infrastructure needs, vacancy levels, and available land when determining where to build new housing. Hon. Mirisch also stated that if a jurisdiction is at an equilibrium of jobs and housing, it should not be responsible for affording excess housing units allocated to neighboring cities.

Dave Ward, County of Ventura, expressed the importance of ensuring a RHNA distribution that is based upon the most accurate data in order to not be met with negative consequences under new state housing laws. Mr. Ward was appreciative of permit building activity being taken out of the existing need consideration but voiced concerns about most of Ventura County's vacant land being in rural areas with limited infrastructures and in high fire hazard areas. Mr. Ward stated that overall Ventura County is supportive of the Staff Recommended Draft RHNA Methodology.

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Josh Lee, SBCTA, commented on findings made that would disproportionately allocate additional new housing units to San Bernardino County with the use of the new Draft Methodology. Mr. Lee expressed concerns with the elements of the Draft Methodology that led to such a high additional increase and requested for changes to be made to ensure a more equitable distribution across all counties in the region.

Mark Oyler, City of Palmdale, expressed support for the Draft RHNA Methodology and concurred with most of the points made, particularly regarding the jobs-housing balance.

#### **SUBCOMMITTEE MEMBER DISCUSSIONS**

Ex-officio member Jeff Montejano, BIA of Southern California, clarified that there are a lot of opportunities on vacant land for developers to build affordable housing and that there must be a balance regarding high density housing to ensure affordability in the region.

Hon. Ramirez, Ventura County, expressed support for moving the Staff Recommended Draft RHNA Methodology along but with reservations in regards to unintended consequences that could come in the form of exacerbating disadvantaged communities when developing new housing.

Hon. Jim Mulvihill, San Bernardino County, asked staff to clarify housing units given for City of Culver City and City of Coachella in Leonora Camner's, Abundant Housing LA, public comment.

Dr. Kevin Kane, SCAG staff, confirmed these numbers. Kome Ajise, Executive Director of SCAG, and Chair Peggy Huang reiterated points that the RHNA allocation number given to a jurisdiction is the baseline and that more units can be built so long as there is enough funding and available land.

Ex-officio member Paavo Monkkonen, UCLA, presented on some independent research conducted which he found showcased a negative correlation between Jobs Accessibility and Projected Household Growth 2020-2045, thus going against sustainable practices as it would entail jurisdictions with larger available land being allocated higher housing unit numbers. Mr. Monkkonen encouraged that a voting member of the Subcommittee make the motion to approve the Staff Recommended Draft RHNA Methodology on the condition that the percentages that make up existing need be shifted so that two-thirds would be based on jobs and transit and one-third based on projected growth.

Several members of the RHNA Subcommittee thanked SCAG staff for the work put into formulating the Draft RHNA Methodology and wished to point out concerns from public comments made by the City of Irvine and SBCTA about certain factors such as HQTA consideration. Some shared personal feelings about housing affordability and concerns regarding the need for jobs to relocate to where people move.

Hon. Rex Richardson, Los Angeles County, spoke in support of the Staff Recommended Draft RHNA Methodology, and indicated that the methodology adhered to the guidelines set out by the Regional Council while also incorporating several public comments. Hon. Richardson also felt that the Social Equity Adjustment proposed is modest for the region and that the adjustment encourages housing development for higher income levels in certain jurisdictions and will benefit surrounding jurisdictions.

Chair Huang thanked staff for their guidance throughout this process and indicated that there are resources available outside of the RHNA Subcommittee to assist jurisdictions to develop more housing.

A MOTION was made (Primary Member Wendy Bucknum, Orange County) to move forward the staff recommended Draft RHNA Methodology to the CEHD Committee. The MOTION was SECONDED (Primary Member Margaret Finlay, Los Angeles County).

Hon. Rusty Bailey, Riverside County, proposed a substitute motion for a draft RHNA methodology that would incorporate comments made by Subcommittee ex-officio member Paavo Monkkonen. The substitute motion would eliminate the “Household Growth 2030-2045” factor from allocating the existing need so that the existing need allocation methodology would only include ‘Population within HQTAs’ and ‘Job Accessibility’ as factors at a 50-50 ratio.

A SUBSTITUTE MOTION was made (Primary Member Rusty Bailey, Riverside County) to approve this new option. The SUBSTITUTE MOTION was SECONDED (Primary Member Carmen Ramirez, Ventura County) and was NOT APPROVED by the following votes:

**AYES:** Predmore (Imperial County), Bailey (Riverside County), Ramirez (Ventura County) (3).

**NOES:** Finlay (Los Angeles County), Bucknum (Orange County), Jahn (San Bernardino County) (3).

**ABSTAIN:** None (0).

With the votes resulting in a tie, pursuant to the RHNA Subcommittee Charter, RHNA Subcommittee Chair Peggy Huang broke the tie with a vote of NO, resulting in this SUBSTITUTE MOTION to NOT PASS.

President Bill Jahn, San Bernardino County, called to vote on the original motion to move forward with staff the recommended Draft RHNA Methodology to the CEHD Committee. The original MOTION was APPROVED by the following votes:

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**AYES:** Predmore (Imperial County), Finlay (Los Angeles County), Bucknum (Orange County), Jahn (San Bernardino County), Ramirez (Ventura County) (5).

**NOES:** Bailey (Riverside County) (1).

**ABSTAIN:** None (0).

**CHAIR’S REPORT**

Chair Peggy Huang announced that there would be a special meeting of the CEHD Committee to review the Draft RHNA Methodology to be held at the Los Angeles SCAG office on Monday, October 21, 2019.

**STAFF REPORT**

**ANNOUNCEMENT/S**

**ADJOURNMENT**

There being no further business, Chair Peggy Huang adjourned the meeting at 12:23 PM.

The next regular meeting of the RHNA Subcommittee is tentatively scheduled for Monday, January 6, 2019 from 10:00 AM to 12:00 PM at the Wilshire Grand Center, 900 Wilshire Boulevard, Suite 1700, Los Angeles, California 90017.

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Southern California Association of Governments  
900 Wilshire Boulevard, Suite 1700, Los Angeles, California 90017  
**February 24, 2020**

**To:** Regional Housing Needs Assessment Subcommittee (RHNA)

**EXECUTIVE DIRECTOR'S  
APPROVAL**

**From:** Kome Ajise, Executive Director, Executive Management,  
213-236-1835, [Ajise@scag.ca.gov](mailto:Ajise@scag.ca.gov)

**Subject:** State HCD Review Findings of SCAG's Draft RHNA Methodology

**RECOMMENDED ACTION:**

Receive and File

**STRATEGIC PLAN:**

This item supports the following Strategic Plan Goal 1: Produce innovative solutions that improve the quality of life for Southern Californians.

**EXECUTIVE SUMMARY:**

*On January 13, 2020, the state Housing and Community Development (HCD) Department issued its review findings on SCAG's Draft Regional Housing Needs Assessment (RHNA) Allocation Methodology. HCD's review finds that SCAG's Draft RHNA Methodology furthers the five statutory objectives described in state housing law, California Government Code Section 65584(d) [please see HCD letter attached].*

**BACKGROUND:**

On November 7, 2019, the Regional Council approved the Draft RHNA Allocation Methodology for HCD's review.

On January 13, 2020, HCD issued its review findings on SCAG's Draft RHNA Allocation Methodology. HCD's review finds that SCAG's Draft RHNA Methodology furthers the five statutory objectives set forth in state housing law, California Government Code Section 65584(d). With HCD's review completed, staff will proceed to recommend the Regional Council-approved Draft RHNA Methodology as the Final RHNA Methodology (through the RHNA Subcommittee and CEHD) with RC adoption scheduled on March 5, 2020.

Additionally, in preparing for the upcoming RHNA Appeals process scheduled to begin in April this year, SCAG held a Workshop on RHNA Appeals on February 3, 2020. The Workshop provided a preview of the RHNA Appeals Procedures which is also scheduled for RC adoption on March 5, 2020 after it is reviewed by the RHNA Subcommittee and CEHD respectively.

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For additional information about upcoming RHNA-related meetings, please visit SCAG's RHNA webpage at [www.scag.ca.gov/rhna](http://www.scag.ca.gov/rhna).

**FISCAL IMPACT:**

None

**ATTACHMENT(S):**

1. HCD Letter dated, 01-13-2020



## AGENDA ITEM 5

Written Comments Received on the 6th Cycle RHNA (as of 2/6/20)

Date of Letter	Organization	Name	Topic(s)
10/11/2018	City of Beverly Hills	Hon. John Mirisch	Subcommittee membership
12/2/2018	City of Mission Viejo	Gail Shiomoto-Lohr	Subcommittee charter, subregional delegation, growth forecast
1/17/2019	City of Beverly Hills	Hon. John Mirisch	Urban sprawl
2/4/2019	City of Beverly Hills	Hon. John Mirisch	Role of housing supply, single family homes, subcommittee membership
3/11/2019	City of Beverly Hills	Hon. John Mirisch	Subcommittee membership, upzoning, single family homes
3/30/2019	City of Beverly Hills	Hon. John Mirisch	Upzoning, urbanism, density
5/2/2019	Central Cities Association of Los Angeles	Jessica Lall	Regional Determination
5/6/2019	City of Irvine	Marika Poynter	Regional determination, existing need distribution, social equity adjustment
5/20/2010	City of Redondo Beach	Sean Scully	Existing housing need and zoning
5/23/2019	UCLA Luskin School of Public Affairs	Paavo Monkkonen	Zoning, housing prices, and regulation
5/28/2019	Orange County Council of Governments (OCCOG)	Hon. Stacy Berry	Regional determination consultation package
5/29/2019	City of Anaheim	Chris Zapata	Regional determination consultation package
5/31/2019	City of Yorba Linda	David Brantley	Regional determination consultation package
6/1/2019	City of Mission Viejo		Regional determination consultation package; distribution methodology
6/3/2019	City of Newport Beach	Seimone Jurjis	Regional determination consultation package
6/3/2019	UCLA	Paavo Monkkonen	Regional determination consultation package
6/4/2019	City of Tustin	Elizabeth Binsack	Regional determination consultation package
6/4/2019		Henry Fung	Public outreach and engagement; regional determination consultation package
6/5/2019		Hunter Owens	Regional determination consultation package
6/5/2019	City of Santa Ana	Kristine Ridge	Regional determination consultation package
6/5/2019	City of Newport Beach	Seimone Jurjis	Regional determination consultation package
6/5/2019	City of Calabasas	Mayor David Shapiro	RHNA methodology
6/5/2019		Vyki Englert	Regional determination consultation package
6/5/2019		Juan Lopez	Regional determination consultation package
6/5/2019		Louis Mirante	Regional determination consultation package
6/5/2019		Carter Rubin	Regional determination consultation package
6/6/2019		Hon. Meghan Sahli-Wells, City of Culver City	Regional determination consultation package
6/5/2019		Andy Freeland	Regional determination consultation package
6/5/2019		Eve Bachrach	Regional determination consultation package
6/6/2019		Emily Groendyke	Regional determination consultation package
6/6/2019		Timothy Hayes	Regional determination consultation package
6/6/2019		Carter Moon	Regional determination consultation package
6/6/2019		Jesse Lerner-Kinglake	Regional determination consultation package
6/6/2019		Alex Fisch	Regional determination consultation package
6/6/2019		Jed Lowenthal	Regional determination consultation package
6/6/2019	City of Moorpark	Karen Vaughn	Proposed RHNA Methodology
6/6/2019	City of La Habra	Jim Gomez	Regional determination package
6/6/2019	County of Orange	Supervisor Donald Wagner	Regional determination package
6/18/2019		Thomas Glaz	Proposed RHNA methodology
6/18/2019		Brendan Regulinski	Proposed RHNA methodology
6/18/2019		Chris Palencia	Proposed RHNA methodology
6/19/2019		Henry Fung	Action on regional determination; proposed RHNA methodology; public hearing and outreach process
6/21/2019		Glenn Egelko	Subcommittee member remarks
6/22/2019		Donna Smith	Proposed RHNA methodology

Written Comments Received on the 6th Cycle RHNA (as of 2/6/20)

Date of Letter	Organization	Name	Topic(s)
6/24/2019		Fred Zimmerman	Regional determination package
6/24/2019		Antoine Wakim	Regional determination package
6/24/2019		Darrell Clarke	Regional determination package
6/24/2019		Marcos Rodriguez Maciel	Regional determination package
6/24/2019		Taylor Hallam	Regional determination package
6/24/2019		Phil Lord	Regional determination package
6/24/2019		Edwin Woll	Regional determination package
6/24/2019		Steven Guerry	Regional determination package
6/24/2019		Prabhu Reddy	Regional determination package
6/24/2019		Judd Schoenholtz	Regional determination package
6/24/2019		Bret Contreras	Regional determination package
6/24/2019		Mark Montiel	Regional determination package
6/24/2019		Hardy Wronske	Regional determination package
6/24/2019		William Wright	Regional determination package
6/24/2019		Nicholas Burns III	Regional determination package
6/24/2019		Brendan Regulinski	Regional determination package
6/24/2019		Gabe Rose	Regional determination package
6/24/2019		Sean McKenna	Regional determination package
6/24/2019		Lolita Nurmamade	Regional determination package
6/24/2019		Paul Moorman	Regional determination package
6/24/2019		Ryan Welch	Regional determination package
6/24/2019		Gerald Lam	Regional determination package
6/24/2019		Carol Gordon	Regional determination package
6/24/2019		Anthony Dedousis	Regional determination package
6/24/2019		Christopher Cooper	Regional determination package
6/24/2019		Colin Frederick	Regional determination package
6/24/2019		Joe Goldman	Regional determination package
6/24/2019		David Douglass-Jaimes	Regional determination package
6/24/2019		Liz Barillas	Regional determination package
6/24/2019		Andy Freeland	Regional determination package
6/24/2019		Grayson Peters	Regional determination package
6/24/2019		Andrew Oliver	Regional determination package
6/24/2019		Kyle Jenkins	Regional determination package
6/24/2019		Matthew Ruscigno	Regional determination package
6/24/2019		Amar Billoo	Regional determination package
6/24/2019		Joshua Blumenkopf	Regional determination package
6/24/2019		Leonora Camner	Regional determination package
6/24/2019		Ryan Tanaka	Regional determination package
6/24/2019		Partho Kalyani	Regional determination package
6/24/2019		Victoria Englert	Regional determination package
6/24/2019		Josh Albrektson	Regional determination package
6/24/2019		Matt Stauffer	Regional determination package
6/24/2019		Brooks Dunn	Regional determination package
6/24/2019		Nancy Barba	Regional determination package
6/24/2019		Sandra Madera	Regional determination package
6/25/2019		Gregory Dina	Regional determination package
6/25/2019		Brent Gaisford	Regional determination package
6/25/2019		Andrew Kerr	Regional determination package
6/25/2019		Hunter Owens	Regional determination package

Written Comments Received on the 6th Cycle RHNA (as of 2/6/20)

Date of Letter	Organization	Name	Topic(s)
6/25/2019		Alexander Murray	Regional determination package
6/25/2019		Eric Hayes	Regional determination package
6/25/2019		Brent Stoll	Regional determination package
6/25/2019		Matthew Dixon	Regional determination package
6/25/2019		Mark Yetter	Regional determination package
6/25/2019		Chase Engelhardt	Regional determination package
6/25/2019		Hugh Martinez	Regional determination package
6/25/2019		Christopher Palencia	Regional determination package
6/25/2019		Nathan Pope	Regional determination package
6/25/2019		Lauren Borchard	Regional determination package
6/25/2019		Shane Philips	Regional determination package
6/25/2019		Alexander Naylor	Regional determination package
6/25/2019		Andy May	Regional determination package
6/25/2019		Jon Dearing	Regional determination package
6/25/2019		David Barboza	Regional determination package
6/26/2019		Sofia Tablada	Regional determination package
6/26/2019		Amanda Wilson	Regional determination package
6/26/2019		Mike Bettinardi	Regional determination package
6/26/2019		Emily Skehan	Regional determination package
6/26/2019	City of Long Beach	Patrick West	Proposed RHNA methodology
6/27/2019		Jesse Silva	Regional determination package
6/27/2019		Ryan Rubin	Regional determination package
6/27/2019	City of Garden Grove	Mayor Steve Jones	Regional determination package; proposed RHNA methodology
6/27/2019	County of Los Angeles	Amy Bodek	Proposed RHNA methodology
6/28/2019		Maggie Rattay	Regional determination package
6/28/2019		Brittney Hojo	Regional determination package
6/28/2019		Thomas Irwin	Regional determination package
6/28/2019		Steph Pavon	Regional determination package
7/3/2019		Tyler Lindberg	Regional determination package
7/3/2019		Ji Son	Regional determination package
7/3/2019		David Kitani	Regional determination package
7/3/2019		Chase Andre	Regional determination package
7/3/2019		Taily Pulido	Regional determination package
7/5/2019		Stephanie Palencia	Regional determination package
7/6/2019		Charlie Stigler	Regional determination package
7/8/2019		Chris Rattay	Regional determination package
7/9/2019		Holly Osborne	Proposed RHNA Methodology
7/9/2019	City of Ojai	James Vega	Proposed RHNA Methodology
7/10/2019	City of South Gate	Joe Perez	Proposed RHNA Methodology
7/11/2019	City of Malibu	Reva Feldman	Proposed RHNA Methodology
7/16/2019	City of Los Angeles, 15 <sup>th</sup> District	Aksel Palacios	Affordable Housing Solutions
7/17/2019	City of Culver City	Mayor Meghan Sahli-Wells	Regional Determination
7/18/2019	League of Women Voters of Los Angeles	Sandra Trutt	Zoning and Homelessness
7/18/2019	County of Riverside	Juan Perez	Proposed RHNA allocation
7/19/2019	League of Women Voters of Los Angeles County	Marge Nichols	Regional Determination
7/20/2019		Therese Mufic Neustaedter	Regional Determination
7/23/2019	County of Ventura – Board of Supervisors	Supervisor Steve Bennett	Proposed RHNA Methodology
7/25/2019		Jose Palencia	Regional Determination

Written Comments Received on the 6th Cycle RHNA (as of 2/6/20)

Date of Letter	Organization	Name	Topic(s)
7/27/2019		Henry Fung	Proposed RHNA Methodology
7/29/2019		Paavo Monkkonen	Proposed RHNA Methodology
7/29/2019		Paavo Monkkonen	Proposed RHNA Methodology
7/29/2019	Endangered Habitats League	Dan Silver	Proposed RHNA methodology
7/31/2019	League of Women Voters Los Angeles County	Marge Nichols	Regional Determination; Proposed RHNA Methodology
7/31/2019	City of Beverly Hills	Mayor John Mirisch	Proposed RHNA Methodology
7/31/2019	City of Beverly Hills	Mayor John Mirisch	Proposed RHNA Methodology
7/31/2019		Assm. Richard Bloom	Proposed RHNA Methodology
8/1/2019	League of Women Voters Santa Monica	Natalya Zernitskaya	Proposed RHNA Methodology
8/1/2019	City of Malibu	Bonnie Blue	Proposed RHNA Methodology; SB 182
8/1/2019	People for Housing OC	Elizabeth Hansburg	Regional Determination
8/1/2019	City of Big Bear Lake	Jeff Matthieu	Proposed RHNA Methodology
8/2/2019		Donna Smith	?
8/4/2019		Gary Drucker	Proposed RHNA Methodology
8/5/2019		Valerie Fontaine	Proposed RHNA Methodology
8/5/2019		Jay Ross	Proposed RHNA Methodology
8/7/2019		Miriam Cantor	Proposed RHNA Methodology
8/8/2019		Jonathan Baty	Population growth
8/12/2019		City of Yucaipa	Proposed RHNA methodology
8/12/2019		Paul Lundquist	?
8/12/2019		Leonora Camner	Proposed RHNA Methodology
8/12/2019		Ryan Tanaka	Proposed RHNA Methodology
8/12/2019		Jesse Silva	Proposed RHNA Methodology
8/12/2019		Joshua Gray-Emmer	Proposed RHNA Methodology
8/12/2019		Chase Engelhardt	Proposed RHNA Methodology
8/12/2019		Drew Heckathorn	Proposed RHNA Methodology
8/12/2019		Liz Barillas	Proposed RHNA Methodology
8/12/2019		Jonah Bliss	Proposed RHNA Methodology
8/12/2019		Angus Beverly	Proposed RHNA Methodology
8/12/2019		Gregory Dina	Proposed RHNA Methodology
8/12/2019		Eduardo Mendoza	Proposed RHNA Methodology
8/12/2019		Carol Gordon	Proposed RHNA Methodology
8/12/2019		Joanne Leavitt	Proposed RHNA Methodology
8/12/2019		Mark Yetter	Proposed RHNA Methodology
8/12/2019		Meredith Jung	Proposed RHNA Methodology
8/12/2019		Nicholas Burns III	Proposed RHNA Methodology
8/12/2019		Judd Scoenholtz	Proposed RHNA Methodology
8/12/2019		Lee Benson	Proposed RHNA Methodology
8/12/2019		Kate Poisson	Proposed RHNA Methodology
8/12/2019		Joshua Blumenkopf	Proposed RHNA Methodology
8/12/2019		Anthony Dedousis	Proposed RHNA Methodology
8/12/2019		Christopher Tausanovitch	Proposed RHNA Methodology
8/12/2019		Emerson Dameron	Proposed RHNA Methodology
8/12/2019		Grayson Peters	Proposed RHNA Methodology
8/12/2019		Tami Kagan-Abrams	Proposed RHNA Methodology
8/12/2019		Lauren Borchard	Proposed RHNA Methodology
8/12/2019		Alec Mitchell	Proposed RHNA Methodology
8/12/2019		Andy Freeland	Proposed RHNA Methodology

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Date of Letter	Organization	Name	Topic(s)
8/12/2019		Michelle Castelletto	Proposed RHNA Methodology
8/12/2019		Brent Gaisford	Proposed RHNA Methodology
8/12/2019		Rebecca Muli	Proposed RHNA Methodology
8/12/2019		Ryan Welch	Proposed RHNA Methodology
8/12/2019		Prabhu Reddy	Proposed RHNA Methodology
8/12/2019		Matthew Dixon	Proposed RHNA Methodology
8/12/2019		Richard Hofmeister	Proposed RHNA Methodology
8/12/2019		David Barboza	Proposed RHNA Methodology
8/12/2019		Michael Drowsky	Proposed RHNA Methodology
8/12/2019		Allison Wong	Proposed RHNA Methodology
8/13/2019		Justin Jones	Proposed RHNA Methodology
8/13/2019		Yurhe Lim	Proposed RHNA Methodology
8/13/2019		Ryan Koyanagi	Proposed RHNA Methodology
8/13/2019		William Wright	Proposed RHNA Methodology
8/13/2019		Norma Guzman	Proposed RHNA Methodology
8/13/2019		Mary Vaiden	Proposed RHNA Methodology
8/13/2019		Andy May	Proposed RHNA Methodology
8/13/2019		Gerald Lam	Proposed RHNA Methodology
8/13/2019		Kelly Koldus	Proposed RHNA Methodology
8/13/2019		Thomas Irwin	Proposed RHNA Methodology
8/14/2019		Susan Decker	Proposed RHNA Methodology
8/14/2019		Michael Busse	Proposed RHNA Methodology
8/14/2019		Rosa Flores	Proposed RHNA Methodology
8/14/2019		Pedro Juarez	Proposed RHNA Methodology
8/14/2019		Zennon Ulyate-Crow	Proposed RHNA Methodology
8/16/2019		Ron Javorsky	
8/16/2019	County of Riverside	Robert Flores	RHNA Public Outreach
8/17/2019		Marianne Buchanan	
8/17/2019		Carolyn Byrnes	Other
8/17/2019		Sharon Willkins	
8/17/2019		Natalya Zernitskaya	Proposed RHNA Methodology
8/19/2019		Kawauna Reed	
8/19/2019		Hon. Manuel Chavez (Costa Mesa Councilmember, District 4)	Proposed RHNA Methodology
		Cassius Rutherford (Parks Commissioner, Costa Mesa)	
		Chris Gaarder (Planning Commission Chair, Fullerton)	
		Brandon Whalen-Castellanos (Transportation Commission Chair, Fullerton)	
		Luis Aleman (Parks Commission, Santa Ana)	
8/19/2019		Theopilis Hester	Proposed RHNA Methodology
8/20/2019	City of Santa Monica	Rick Cole	Proposed RHNA Methodology
8/20/2019	City of Rancho Palos Verdes	Octavio Silva	Proposed RHNA Methodology
8/20/2019	City of Yorba Linda	Mayor Tara Campbell	Proposed RHNA Methodology
8/22/2019	City of Redondo Beach	Mayor William Brand	Proposed RHNA Methodology
8/22/2019	Orange County Council of Governments (OCCOG)	Marnie O. Primmer	Proposed RHNA Methodology
8/23/2019		Bruce Szekes	Public Outreach
8/23/2019	Center for Demographic Research		Proposed RHNA Methodology
8/23/2019		Laura Smith	Housing Distribution
8/23/2019	City of Beverly Hills	Mayor John Mirisch	Proposed RHNA Methodology

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Date of Letter	Organization	Name	Topic(s)
8/24/2019		Sharon Commins	Proposed RHNA Methodology
8/26/2019	City of El Segundo		Proposed RHNA Methodology
8/26/2019		Sean McKenna	Proposed RHNA Methodology
8/26/2019		Mark Chenevey	Proposed RHNA Methodology
8/26/2019		Derek Ryder	Proposed RHNA Methodology
8/26/2019	City of Long Beach	Patrick West	Proposed RHNA Methodology
8/27/2019	City of Mission Viejo	Elaine Lister	Proposed RHNA Methodology data correction
8/27/2019		Shawn Danino	Proposed RHNA Methodology
8/27/2019		Jeffery Alvarez	Proposed RHNA Methodology
8/27/2019		Claudia Vu	Proposed RHNA Methodology
8/27/2019		Laila Delgado	Proposed RHNA Methodology
8/27/2019		Madeline Swim	Proposed RHNA Methodology
8/27/2019		Nicholas Paganini	Proposed RHNA Methodology
8/27/2019		David Aldama	Proposed RHNA Methodology
8/27/2019		Hannah Winnie	Proposed RHNA Methodology
8/27/2019		Akif Khan	Proposed RHNA Methodology
8/27/2019		Gianna Lum	Proposed RHNA Methodology
8/27/2019		Bradley Ewing	Proposed RHNA Methodology
8/27/2019		Anne Martin	Proposed RHNA Methodology
8/27/2019		Mysten Walker	Proposed RHNA Methodology
8/27/2019		Verity Freebern	Proposed RHNA Methodology
8/27/2019		Ryan Oillataguerre	Proposed RHNA Methodology
8/27/2019		Emma Desopo	Proposed RHNA Methodology
8/27/2019		Elyssa Medina	Proposed RHNA Methodology
8/27/2019		Judith Trujillo	Proposed RHNA Methodology
8/27/2019		Kenia Agaton	Proposed RHNA Methodology
8/27/2019	OC Business Council	Alicia Berhow	Proposed RHNA Methodology
8/27/2019	Palms Neighborhood Council	Eryn Block	Proposed RHNA Methodology
8/27/2019	County of Riverside	Juan Perez	Proposed RHNA Methodology
8/28/2019		Sophia Parmisano	Proposed RHNA Methodology
8/28/2019		Anthony Castelletto	Proposed RHNA Methodology
8/28/2019		Minh Le	Proposed RHNA Methodology
8/28/2019		Carol Luong	Proposed RHNA Methodology
8/28/2019		Chitra Patel	Proposed RHNA Methodology
8/28/2019		Misha Ponnuraju	Proposed RHNA Methodology
8/27/2019		Griffin McDaniel	Proposed RHNA Methodology
8/28/2019		Lauren Walker	Proposed RHNA Methodology
8/28/2019		Robert Flores	Proposed RHNA Methodology
8/28/2019		Hailey Maxwell	Proposed RHNA Methodology
8/28/2019		Carey Kayser	Proposed RHNA Methodology
8/28/2019		Annie Bickerton	Proposed RHNA Methodology
8/29/2019	City of Fullerton	Matt Foulkes	Proposed RHNA Methodology
8/29/2019	City of Norco	Steve King	Proposed RHNA Methodology
8/29/2019	City of Signal Hill	Mayor Lori Wood	Proposed RHNA Methodology
8/29/2019	SCANPH	Francisco Martinez	Proposed RHNA Methodology
8/29/2019		Ross Heckmann	Proposed RHNA Methodology
8/30/2019		Dottie Alexanian	Proposed RHNA Methodology
8/30/2019		Judith Deutsch	Proposed RHNA Methodology
8/30/2019	City of Tustin	Elizabeth Binsack	Proposed RHNA Methodology

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Date of Letter	Organization	Name	Topic(s)
8/30/2019	City of Menifee	Cheryl Kitzerow	Proposed RHNA Methodology
8/31/2019		Paavo Monkkonen	Proposed RHNA Methodology
8/31/2019		Paavo Monkkonen and 27 professors	Proposed RHNA Methodology
8/31/2019		Ryan Kelly	Proposed RHNA Methodology
8/31/2019		Hydee Feldstein	Proposed RHNA Methodology
8/31/2019		Alex Ivina	Proposed RHNA Methodology
8/31/2019		Steve Rogers	Proposed RHNA Methodology
8/31/2019		Phil Davis	Proposed RHNA Methodology
8/31/2019		Kathy Hersh	Proposed RHNA Methodology
9/1/2019		Jane Demian	Proposed RHNA Methodology
9/1/2019		Diana Stiller	Proposed RHNA Methodology
9/1/2019		Paula Bourges	Proposed RHNA Methodology
9/1/2019		Raymond Goldstone	Proposed RHNA Methodology
9/1/2019		Christopher Palencia	Proposed RHNA Methodology
9/2/2019		Doris Roach	Proposed RHNA Methodology
9/3/2019		Judy Saunders	Proposed RHNA Methodology
9/3/2019		Susan Ashbrook	Proposed RHNA Methodology
9/3/2019		Marcelo & Irene Olavarria	Proposed RHNA Methodology
9/3/2019		Margret Healy	Proposed RHNA Methodology
9/3/2019		Genie Saffren	Proposed RHNA Methodology
9/3/2019	City of Rancho Santa Margarita	Cheryl Kuta	Proposed RHNA Methodology
9/3/2019	City of Corona	Joanne Coletta	Proposed RHNA Methodology
9/3/2019	City of Desert Hot Springs	Rebecca Deming	Proposed RHNA Methodology
9/3/2019		Karen Boyarsky	Regional Determination
9/3/2019		Nancee L.	Proposed RHNA Methodology
9/3/2019		Tracy St. Claire	Regional Determination
9/4/2019		Shelly Carlo	Housing Distribution
9/4/2019		Bill Zimmerman	Proposed RHNA Methodology
9/4/2019		Mark Vallianatos	Proposed RHNA Methodology
9/4/2019		Marilyn Frost	Housing Distribution
9/4/2019		Matthew Stevens	Proposed RHNA Methodology
9/4/2019		Georgianne Cowan	Regional Determination
9/4/2019		Lisa Schecter	Regional Determination
9/4/2019		Carol Watkins	Regional Determination
9/4/2019		Mark Robbins	Regional Determination
9/4/2019		Susan Horn	Regional Determination
9/4/2019		Barbara Broide	Regional Determination
9/4/2019		Joseph Sherwood	Regional Determination
9/4/2019		Linda Sherwood	Regional Determination
9/4/2019		Darren Swimmer	Regional Determination
9/4/2019		Lee Zeldin	Regional Determination
9/4/2019		Nancy Rae Stone	Regional Determination
9/4/2019		Rachael Gordon	Regional Determination
9/4/2019		Martha Singer	Regional Determination
9/4/2019		Laurie Balustein	Regional Determination
9/4/2019		Henry Fung	Regional Determination
9/4/2019		Brad Pennington	Regional Determination
9/4/2019		Mike Javadi	Regional Determination
9/4/2019		Lauren Thomas	Regional Determination

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Date of Letter	Organization	Name	Topic(s)
9/4/2019		Keith Solomon	Regional Determination
9/4/2019		Linda Blank	Regional Determination
9/4/2019		Valerie Brucker	Regional Determination
9/4/2019		Craig Rich	Regional Determination
9/4/2019		Wansun Song	Regional Determination
9/4/2019		Robert Seligman	Regional Determination
9/4/2019	City of Newport Beach	Seimone Jurjis	Regional Determination
9/4/2019	City of Calabasas	Mayor David Shapiro	Regional Determination
9/4/2019		Paul Soroudi	Regional Determination
9/4/2019		Terrence Gomes	Regional Determination
9/4/2019		Kimberly Fox	Regional Determination
9/4/2019		Mra Tun	Regional Determination
9/4/2019		Laura Levine Lacter	Regional Determination
9/4/2019		Stephen Resnick	Regional Determination
9/4/2019		Kimberly Christensen	Regional Determination
9/4/2019		Rita Villa	Regional Determination
9/4/2019	City of San Clemente	James Makshanoff	Proposed RHNA Methodology
9/4/2019	City of Beaumont	Julio Martinez	Proposed RHNA Methodology
9/4/2019	City of Hawthorne	Arnold Shadbehr	Proposed RHNA Methodology
9/5/2019	City of Murrieta	Mayor Kelly Seyarto	Proposed RHNA Methodology
9/5/2019	City of Canyon Lake	Jim Morrissey	Proposed RHNA Methodology
9/5/2019		Hunter Owens	Proposed RHNA Methodology
9/5/2019		Stephen Twining	Regional Determination
9/5/2019		Paul Callinan	Regional Determination
9/5/2019		C. McAlpin	Regional Determination
9/5/2019		Isabel Janken	Regional Determination
9/5/2019		Ann Hayman	Regional Determination
9/5/2019		Meg Sullivan	Housing Production
9/5/2019	City of Moreno Valley	Patty Nevins	Proposed RHNA Methodology
9/5/2019		Massy Mortazavi	Regional Determination
9/5/2019		Fred Golan	Regional Determination
9/5/2019		Debbie & Howard Nussbaum	Regional Determination
9/5/2019		Devony Hastings	Regional Determination
9/5/2019	League of Women Voters of Los Angeles County	Marge Nichols	RHNA Methodology
9/5/2019		Larry Blugrind	Housing Distribution
9/5/2019		Terry Tegnazian	Regional Determination
9/5/2019	Gateway Cities Council of Governments (GCCOG)	M. Diane DuBois	RHNA Methodology
9/5/2019		Denson Fujikawa	Other
9/5/2019		Tracy Fitzgerald	Regional Determination
9/5/2019	City of Pomona	Anita Gutierrez	Proposed RHNA Methodology
9/5/2019		Minhlinh Nguyen	Regional Determination
9/5/2019		Anita Gutierrez	Proposed RHNA Methodology
9/5/2019	City of Fountain Valley	Steve Nagel	Proposed RHNA Methodology
9/5/2019	City of Camarillo	Kevin Kildee	Proposed RHNA Methodology
9/5/2019		Denson Fujikawa	Other
9/6/2019	City of Sierra Madre	Gabriel Engeland	Proposed RHNA Methodology
9/6/2019	City of Laguna Hills	Donald White	Proposed RHNA Methodology



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Date of Letter	Organization	Name	Topic(s)
9/6/2019		David Oliver	Regional Determination
9/6/2019	City of Chino Hills	Joann Lombardo	Proposed RHNA Methodology
9/7/2019		David Ting	Regional Determination
9/9/2019	City of Azusa	Sergio Gonzalez	Proposed RHNA Methodology
9/9/2019	City of Alhambra	Jessica Binnquist	Proposed RHNA Methodology
9/9/2019	Los Angeles Chamber of Commerce	Maria Salinas	RHNA Methodology
9/9/2019	City of Ranchos Palos Verdes	Octavio Silva	Proposed RHNA Methodology
9/9/2019		Kathy Whooley	Regional Determination
9/9/2019	San Gabriel Valley Council of Governments (SGVCOG)	Cynthia Sternquist	Proposed RHNA Methodology
9/9/2019		Matthew Hinsley	Regional Determination
9/9/2019	City of Agoura Hills	Greg Ramirez	Proposed RHNA Methodology
9/10/2019	City of Redondo Beach	Laura Emdee	Regional Determination
9/10/2019		Jessica Sandoval	Proposed RHNA Methodology
9/10/2019	City of Redondo Beach	Bill Brand	Proposed RHNA Methodology
9/10/2019		Yesenia Medina	Regional Determination
9/10/2019		Jeannette Mazul	Regional Determination
9/10/2019		Jocelyne Irineo	Proposed RHNA Methodology
9/10/2019		Cristina Resendez	Proposed RHNA Methodology
9/10/2019		Carla Bucio	Proposed RHNA Methodology
9/10/2019	City of Redondo Beach	Bill Brand	Proposed RHNA Methodology
9/10/2019	City of Redondo Beach	Laura Emdee	Proposed RHNA Methodology
9/10/2019	City of Garden Grove	Steve Jones	Proposed RHNA Methodology
9/10/2019		Henry Fung	Overall RHNA Process
9/10/2019	City of San Marino	Aldo Cervantes	Proposed RHNA Methodology
9/10/2019	City of South Gate	Jorge Morales	Proposed RHNA Methodology
9/10/2019	City of Torrance	Patrick Furey	Proposed RHNA Methodology
9/10/2019	City of Rancho Cucamonga	John Gillison	Proposed RHNA Methodology
9/10/2019		Jeannette Mazul	Affordable Housing
9/10/2019		Tina Kim	Proposed RHNA Methodology
9/11/2019	City of South Pasadena	Stephanie DeWolfe	Proposed RHNA Methodology
9/11/2019	City of Glendora	Jeff Kugel	Proposed RHNA Methodology
9/11/2019	City of Ojai	John F. Johnson	Proposed RHNA Methodology
9/11/2019	City of Oxnard	Tim Flynn	Proposed RHNA Methodology
9/11/2019	City of Westlake Village	Ned E. Davis	Proposed RHNA Methodology
9/11/2019	City of Cerritos	Art Gallucci	Proposed RHNA Methodology
9/11/2019	City of Hemet	Christopher Lopez	Proposed RHNA Methodology
9/11/2019	City of La Palma	Laurie Murray	Proposed RHNA Methodology
9/11/2019	City of Bell	Ali Saleh	Proposed RHNA Methodology
9/11/2019		Karen Rivera	Regional Determination
9/11/2019		David Coffin	Regional Determination
9/12/2019	City of Lomita	Alicia Velasco	Proposed RHNA Methodology
9/12/2019	City of Wildomar	Matthew Bassi	Proposed RHNA Methodology
9/12/2019	City of Aliso Viejo	David Doyle	Proposed RHNA Methodology
9/12/2019	City of Commerce	Vilko Domic	Proposed RHNA Methodology
9/12/2019	City of El Monte	Betty Donovanik	Proposed RHNA Methodology
9/12/2019	South Bay Cities Council of Governments (SBCCOG)	Christian Horvath	Proposed RHNA Methodology
9/12/2019	City of Huntington Beach	Dave Kiff	Proposed RHNA Methodology

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Date of Letter	Organization	Name	Topic(s)
9/12/2019	City of Rosemead	Gloria Molleda	Proposed RHNA Methodology
9/12/2019	City of Dana Point	Matt Schneider	Proposed RHNA Methodology
9/12/2019	City of Placentia	Rhonda Shader	Proposed RHNA Methodology
9/12/2019	City of Palos Verdes Estates	Carolynn Petru	Proposed RHNA Methodology
9/12/2019	City of Palmdale	Mark Oyler	Proposed RHNA Methodology
9/12/2019	City of Hawthorne	Alejandro Vargas	Proposed RHNA Methodology
9/12/2019	City of Irvine	Mayor Christina L. Shea	Proposed RHNA Methodology
9/12/2019	City of Walnut	Rob Wishner	Proposed RHNA Methodology
9/12/2019	City of Maywood	Jennifer Vasquez	Proposed RHNA Methodology
9/12/2019	City of Culver City	Meghan Sahli-Wells	Proposed RHNA Methodology
9/12/2019	City of Buena Park	Joel Rosen	Proposed RHNA Methodology
9/12/2019	City of Santa Clarita	Thomas Cole	Proposed RHNA Methodology
9/12/2019	City of Temecula	Luke Watson	Proposed RHNA Methodology
9/12/2019	City of Lake Elsinore	Richard MacHott	Proposed RHNA Methodology
9/12/2019	City of San Dimas	Ken Duran	Proposed RHNA Methodology
9/12/2019	City of Irwindale	William Tam	Proposed RHNA Methodology
9/12/2019	City of Santa Ana	Kristine Ridge	Proposed RHNA Methodology
9/12/2019	City of La Mirada	Jeff Boynton	Proposed RHNA Methodology
9/12/2019	City of Anaheim	Chris Zapata	Proposed RHNA Methodology
9/12/2019	City of Costa Mesa	Lori Ann Farrell Harrison	Proposed RHNA Methodology
9/12/2019	City of Huntington Park	Sergio Infanzon	Proposed RHNA Methodology
9/12/2019	Westside Neighborhood Council	Terri Tippit	Proposed RHNA Methodology
9/12/2019	City of Eastvale	Bryan Jones	Proposed RHNA Methodology
9/12/2019		John Birkett	Regional Determination
9/12/2019		Lourdes Petersen	Regional Determination
9/12/2019		Jesse Silva	Proposed RHNA Methodology
9/12/2019		Anne Hilborn	Proposed RHNA Methodology
9/12/2019		Henry Fung	Proposed RHNA Methodology
9/13/2019		Holly Osborne	Proposed RHNA Methodology
9/13/2019		Niall Huffman	Proposed RHNA Methodology
9/13/2019		Michael Hoskinson	Proposed RHNA Methodology
9/13/2019	San Bernardino County Transportation Authority/Council of Governments (SBCTA/SBCOG)	Darcy McNaboe	Proposed RHNA Methodology
9/13/2019	City of Downey	Aldo Schindler	Proposed RHNA Methodology
9/13/2019	City of Bellflower	Elizabeth Corpuz	Proposed RHNA Methodology
9/13/2019	City of Lakewood	Abel Avalos	Proposed RHNA Methodology
9/13/2019	City of Orange	Rick Otto	Proposed RHNA Methodology
9/13/2019	City of Paramount	John Carver	Proposed RHNA Methodology
9/13/2019	City of Rolling Hills	Jeff Pieper	Proposed RHNA Methodology
9/13/2019	City of San Fernando	Nick Kimball	Proposed RHNA Methodology
9/13/2019	City of Mission Viejo	Dennis Wilberg	Proposed RHNA Methodology
9/13/2019	City of Moorpark	Karen Vaughn	Proposed RHNA Methodology
9/13/2019	American Planning Association (CA Chapter)	Eric Phillips	Proposed RHNA Methodology
9/13/2019	County of Ventura	David Ward	Proposed RHNA Methodology
9/13/2019	City of Chino	Nicholas Liguori	Proposed RHNA Methodology
9/13/2019	One Step A La Vez	Kate English	Housing Development
9/13/2019	American Planning Association (Los Angeles Section)	Ryan Kurtzman	Proposed RHNA Methodology

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9/13/2019	City of Laguna Beach	Scott Drapkin	Proposed RHNA Methodology
9/13/2019	Santa Monicans for Renters' Rights	Patricia Hoffman and Denny Zane	Proposed RHNA Methodology
9/13/2019	Western Riverside Council of Governments (WRCOG)	Rick Bishop	Proposed RHNA Methodology
9/13/2019	City of Los Angeles	Mayor Eric Garcetti	Proposed RHNA Methodology
9/13/2019	City of West Hollywood	Mayor John D'Amico	Proposed RHNA Methodology
9/13/2019	City of San Juan Capistrano	Joel Rojas	Proposed RHNA Methodology
9/13/2019	City of Thousand Oaks	Mark Towne	Proposed RHNA Methodology
9/13/2019	City of Newport Beach	Seimone Jurjis	Proposed RHNA Methodology
9/13/2019	City of Laguna Niguel	Jonathan Orduna	Proposed RHNA Methodology
9/13/2019	County of San Bernardino	Terri Rahhal	Proposed RHNA Methodology
9/13/2019	City of Indio	Kevin Snyder	Proposed RHNA Methodology
9/13/2019	City of Avalon	Anni Marshall	Proposed RHNA Methodology
9/13/2019	City of Burbank	Patrick Prescott	Proposed RHNA Methodology
9/13/2019	City of Santa Monica Housing Commission	Michael Soloff	Proposed RHNA Methodology
9/13/2019	City of Riverside	Jay Eastman	Proposed RHNA Methodology
9/13/2019	City of Whittier	Conal McNamara	Proposed RHNA Methodology
9/13/2019	City of San Gabriel	Arminé Chaparyan	Proposed RHNA Methodology
9/13/2019	City of San Buenaventura (Ventura)	Peter Gilli	Proposed RHNA Methodology
9/13/2019	City of Temple City	Scott Reimers	Proposed RHNA Methodology
9/13/2019	City of Palm Desert	Ryan Stendell	Proposed RHNA Methodology
9/13/2019	City of Monterey Park	Ron Bow	Proposed RHNA Methodology
9/13/2019	LA Thrives Et Al. (19 total organizations)	LA Thrives Et Al. (19 total organizations)	Proposed RHNA Methodology
9/13/2019	Leadership Council for Justice and Accountability Et Al. (7 total organizations)	Leadership Council for Justice and Accountability Et Al. (7 total organizations)	Proposed RHNA Methodology
9/13/2019	Southern California Business Coalition (7 total organizations)	Southern California Business Coalition (7 total organizations)	Proposed RHNA Methodology
9/15/2019		Michelle Schumacher	Other
9/30/2019	Homeowners of Encino	Eliot Cohen	Proposed RHNA Methodology
9/30/2019		Trudy Sokol	Other
10/1/2019	City of Barstow	Michael Massimini	Proposed RHNA Methodology
10/2/2019	County of Orange	Supervisor Donald Wagner	Draft RHNA Methodology
10/3/2019	County of Riverside	Charissa Leach	Draft RHNA Methodology
10/4/2019	City of Irvine	Mayor Christina L. Shea	Draft RHNA Methodology
10/6/2019	UCLA Luskin School of Public Affairs	Paavo Monkkonen	Draft RHNA Methodology
10/7/2019	City of Costa Mesa	Lori Ann Farrell Harrison	Draft RHNA Methodology
10/8/2019	South Bay Cities Council of Governments (SBCCOG)	Christian Horvath	Draft RHNA Methodology
10/9/2019	Del Rey Residents Association	Tara Walden	Other
10/10/2019		Karen Davis Ferlauto	Other
10/11/2019	Abundant Housing LA	David Bonaccorsi	Draft RHNA Methodology
10/11/2019	City of Oxnard	Mayor Tim Flynn	Draft RHNA Methodology
10/16/2019	County of Riverside	Charissa Leach	Draft RHNA Methodology
10/21/2019	City of Newport Beach	Seimone Jurjis	Draft RHNA Methodology
	San Bernardino County Transportation Authority/Council of Governments		
10/21/2019	(SBCTA/SBCOG)	Ray Wolfe	Draft RHNA Methodology
10/23/2019		Barbara Broide	Draft RHNA Methodology
10/23/2019	County of Riverside	Supervisor Kevin Jeffries	Draft RHNA Methodology

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Date of Letter	Organization	Name	Topic(s)
10/25/2019		Robert Flores	Draft RHNA Methodology
10/25/2019		Reed Bernet	Draft RHNA Methodology
10/29/2019	Rancho Palos Verdes	Ana Mhrianian	Draft RHNA Methodology
10/28/2019		Warren Hogg	Draft RHNA Methodology
10/29/2019	City of Coachella	Luis Lopez	Draft RHNA Methodology
10/31/2019		Marilyn Brown	Purpose of RHNA
11/1/2019		Mayor Rusty Bailey (City of Riverside) Supervisor Karen Spiegel (County of Riverside) Mayor Frank Navarro (City of Colton) Hon. Toni Momberger (City of Redlands)	Draft RHNA Methodology
11/1/2019	City of Los Angeles, 4th District	Hon. David Ryu	Draft RHNA Methodology
11/4/2019	Central Cities Association of Los Angeles	Jessica Lall	Draft RHNA Methodology
11/5/2019	Orange County Council of Governments (OCCOG)	Marnie O. Primmer	Draft RHNA Methodology
11/5/2019	City of Gardena	Mayor Tasha Cerda	Draft RHNA Methodology
11/5/2019	City of Los Angeles	Vincent P. Bertoni and Kevin J. Keller	Draft RHNA Methodology
11/5/2019	City of Huntington Beach	Oliver Chi	Draft RHNA Methodology
11/6/2019	City of Hemet	Christopher Lopez	Draft RHNA Methodology
11/6/2019	City of Chino	Nicholas S. Liguori	Draft RHNA Methodology
11/6/2019	City of Menifee	Cheryl Kitzerow	Draft RHNA Methodology
11/6/2019	County of Los Angeles	Sachi A. Hamai	Draft RHNA Methodology
11/6/2019	City of Newport Beach	Seimone Jurjis	Draft RHNA Methodology
11/6/2019	City of Fontana	Michael Milhiser	Draft RHNA Methodology
11/6/2019	City of Chino Hills	Joann Lombardo	Draft RHNA Methodology
11/6/2019		Henry Fung	Regional Determination
11/6/2019	City of Costa Mesa	Barry Curtis	Draft RHNA Methodology
11/7/2019	City of Temple City	Scott Reimers	Draft RHNA Methodology
11/8/2019	Gateway Cities Council of Governments (GCCOG)	Nancy Pfeffer	Draft RHNA Methodology
11/20/2019	City of Huntington Beach	Michael Gates, Mayor Erik Peterson, and Mayor Pro Tem Lyn Semeta	Draft RHNA Methodology
12/12/2019		Holly Osborne	Draft RHNA Methodology
12/12/2019	City of Tustin	Allan Bernstein	Draft RHNA Methodology
12/19/2019	City of Fountain Valley	Mayor Cheryl Brothers	Draft RHNA Methodology
12/16/2019	City of Chino Hills	Joann Lombardo	Draft RHNA Methodology
12/20/2019	City of Cerritos	Naresh Solanki	Draft RHNA Methodology
1/23/2020		Karen Farley	Draft RHNA Methodology
1/23/2020		Steve Stowell	Draft RHNA Methodology
1/27/2020		Janet Chang	Draft RHNA Methodology
1/29/2020	City of Downey	Mayor Blanca Pacheco	Draft RHNA Methodology
2/4/2020	City of Cerritos	Mayor Naresh Solanki	Draft RHNA Methodology
2/6/2020		Steve Davey	Draft RHNA Methodology
2/6/2020		Connie Bryant	Draft RHNA Methodology
2/6/2020		Tom Wright	Draft RHNA Methodology
2/10/2020	City of Irvine	Marika Poynter	Draft Appeals Procedures
2/10/2020	City of Laguna Hills	David Chantarangsu	Draft Appeals Procedures
2/10/2020	City of Mission Viejo	Gail Shiomoto-Lohr	Draft Appeals Procedures
2/10/2020	City of Santa Ana	Melanie McCann	Draft Appeals Procedures
2/10/2020	City of Oxnard	Elyssa Vasquez	Draft Appeals Procedures
2/10/2020		Jennifer Denmark	Draft Appeals Procedures

Written Comments Received on the 6th Cycle RHNA (as of 2/6/20)

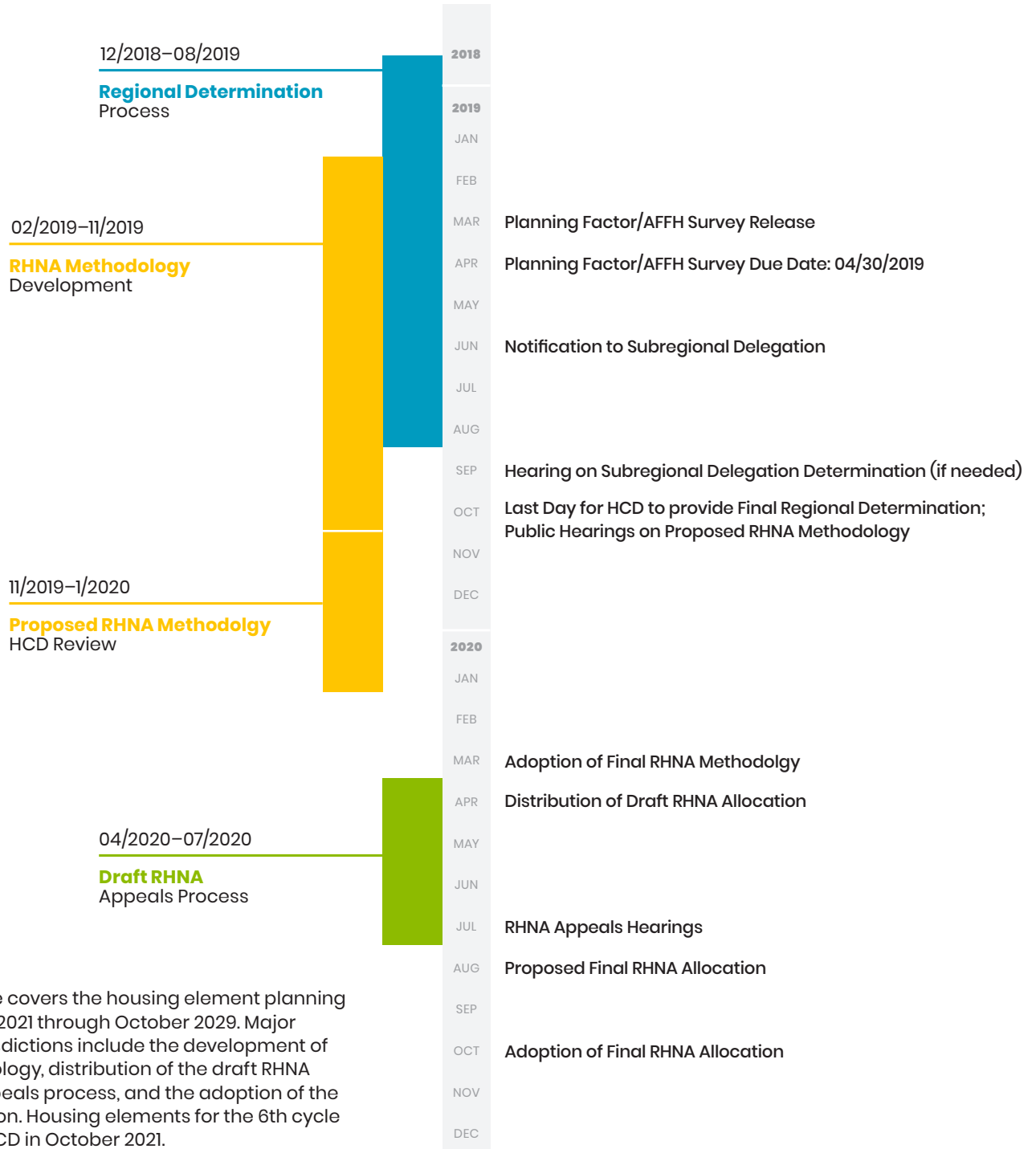
Date of Letter	Organization	Name	Topic(s)
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[All comments are posted online at www.scag.ca.gov/rhna](http://www.scag.ca.gov/rhna). Comments can be submitted to: [housing@scag.ca.gov](mailto:housing@scag.ca.gov)

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DEVELOPMENT TIMELINE

**6TH CYCLE RHNA** *(subject to change)*



The 6th RHNA cycle covers the housing element planning period of October 2021 through October 2029. Major milestones for jurisdictions include the development of the RHNA methodology, distribution of the draft RHNA allocation, the appeals process, and the adoption of the final RHNA allocation. Housing elements for the 6th cycle RHNA are due to HCD in October 2021.

**Public Participation:** Stakeholders and members of the public are welcome to attend all public hearings and meetings, including the RHNA Subcommittee, and provide comments throughout the RHNA process. Dates for upcoming RHNA workshops and Subcommittee meetings are posted at [scag.ca.gov/rhna](http://scag.ca.gov/rhna). Comments and questions regarding RHNA can also be emailed to [housing@scag.ca.gov](mailto:housing@scag.ca.gov).