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March 2, 2020

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

**RE: Request to the Southern California Association of Governments (SCAG) to Amend the Regional Housing Needs Assessment (RHNA) Methodology for the 6<sup>th</sup> Cycle**

Dear Mr. Ajise:

The City of San Dimas appreciates all the work that SCAG staff has done to help develop an equitable RHNA methodology for our region. We feel this RHNA methodology lacks certain considerations that would have a devastating impact on the character of all jurisdictions. The City of San Dimas is a built-out city and any new developments can only happen with the demolition of existing properties. We recognize the challenge of establishing an equitable methodology to redistribute the 1.34 million housing units among 197 jurisdictions; however, the decision to cast aside the last 18-months of cooperative input and progress is truly disappointing.

Local input ensures consistency between the RHNA and the Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS) (referred to by SCAG as Connect SoCal) as required by Government Code Section 65584.04(m). As currently proposed, the draft RHNA methodology calculation would not be consistent with the development patterns proposed in the draft Connect SoCal Plan and its Program Environmental Impact Report (PEIR). For example, Connect SoCal projects approximately 200 households to be formed over the next 25 years in the City of San Dimas; however, the draft RHNA assigns 1245 housing units for the eight-year planning period (2021-2029) for the RHNA. The City of San Dimas requests that SCAG amend the RHNA methodology to reinstate local input as a planning factor within the methodology calculation.

SCAG recently received a proposal from the City of Cerritos dated February 4, 2020, which recommends that household growth forecasts be reintroduced back into the calculations for the existing need as follows: household growth (33.3%), job accessibility (33.3%), and population within high quality transit areas (33.3%). These household growth projections are an important factor in that it takes into consideration the unique characteristics of each jurisdiction. Moreover, the new proposed growth projections more closely align the RHNA calculations with

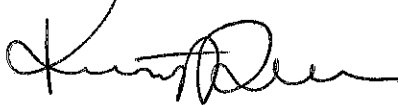
the development pattern established within Connect SoCal as required by state statute. Finally, as stated in the staff-recommended RHNA methodology staff report for the November 7, 2019, Regional Council meeting, the reintroduction of household growth into the existing need would further the five objectives of state housing law.

Additionally, we are also requesting that SCAG submit another objection to the Department of Housing and Community Development (HCD) in that they did not follow state law with the regional determination [see Government Code Section 65584.01(a)]. The Department of Finance recently updated its population projections which show a significant decrease since their previous forecast. This overestimated regional determination combined with an inequitable RHNA methodology are setting up local jurisdictions for failure to comply with state housing law.

We request that the RHNA Subcommittee, CEHD Policy Committee, and Regional Council consider these two recommendations prior to the adoption of the Final RHNA methodology allocation. We recognize that there are time constraints established by state law; however, the RHNA allocation will have significant impacts on jurisdictions over the next decade. Therefore, it is imperative that the RHNA be finalized in a way that is equitable and attainable in responding to the housing crisis.

The City recognizes and appreciates the time and effort provided by everyone on this important and complex issue and for your consideration of these requests. Please let us know if you need any additional clarification or have any questions on our requests.

Sincerely,



Ken Duran  
City Manager

cc: San Dimas City Council