



COUNTY OF RIVERSIDE
Transportation and Land Management Agency
Juan C. Perez
Assistant CEO/TLMA Director



Transportation Department

Planning Department

Building and Safety Department

Code Enforcement Department

July 18, 2019

RHNA Subcommittee of the
Southern California
Association of Governments
900 Wilshire Blvd, Ste. 1700
Los Angeles, CA 90017
C/o Bill Jahn, President

RE: 6th Cycle of the Regional Housing Needs Assessment (RHNA) Allocation.

Dear Mr. Jahn,

Thank you for the opportunity to submit this comment letter on behalf of Riverside County's Transportation and Land Management Agency. Our Agency serves as the Planning entity for Riverside County's unincorporated communities. This letter is intended to highlight and expand on my testimony to the RHNA Subcommittee on June 3, 2019, highlighting concerns with the methodology used in the past by SCAG for the RHNA allocations. We are asking that our concerns be addressed as part of the upcoming 6th Cycle RHNA allocation process.

As a result of the 5th Cycle of RHNA, the unincorporated areas of Riverside County were allocated 30,303 dwelling units, while having a population in the unincorporated area of approximately 385,000. Of these 30,303 units, 17,578 (58%) are designated as non-market rate housing (moderate, low, and very low income). This total unit count is larger than any other jurisdiction within the entirety of the SCAG region (with the exception of the City of Los Angeles, which has 82,002 total units allocated over a population of over 4 million). As a comparison, Los Angeles County (unincorporated) was allocated 30,145 total dwelling units (with an unincorporated population of 1,062,000), while San Bernardino County was allocated 39 units (with an unincorporated population of about 311,000 – similar to Riverside County).

Riverside County is concerned about the RHNA Allocation process producing statistical outliers that cannot be easily rectified. Not only is the unincorporated area of Riverside County being expected to generate a vast amount of dwelling units relative to its population, but a number of cities within our County are facing the same dilemma, such as Desert Hot Springs, with an allocation of 4,196 units for a population of 28,815. We also note that, proportionally, the unincorporated areas of the County constitute about 16% of the total County's population of 2.45 million, but nearly double (30%) of the County-wide unit allocation of 101,374. This allocation in units to the unincorporated area is out of proportion to our ability to provide for urban-scale development.

By its very nature, the unincorporated areas of Riverside County have no “city core” of urban centers, and thus does not have urban-level infrastructure. Riverside County is home to the last four Cities incorporated in California (Jurupa Valley in 2011, Eastvale in 2010, and Menifee and Wildomar in 2008). These cities are located along major transportation corridors such as I-15, SR-60, and I-215, and constitute much of what previously used to be the denser, semi-urbanized portions of the unincorporated area.

There are no commuter rail stations anywhere in the unincorporated areas of Riverside County, and no commuter rail stations anywhere whatsoever in the Coachella Valley, whether in incorporated cities or the unincorporated area. There are few dense employment centers within the unincorporated areas of Riverside County. Any development that occurs within Riverside County has to “pay its own way” for infrastructure improvements, and many of our unincorporated communities lack urban-level infrastructure such as sewer systems, a developed roadway network, sidewalks, and frequent transit service. Often, projects incur significant costs to connect to sewer service miles away, or expand inadequate roads, making it extremely challenging to provide non-market rate housing in a fiscally achievable way. As such, mandating higher density urban-level development in areas that lack the basic infrastructure to support it will cause additional strain on the already over-burdened existing infrastructure, and on our existing unincorporated communities.

In 2015, the County undertook a major planning effort to update our Housing Element in order to meet our 5th Cycle RHNA allocations. This resulted in re-zoning about 1,000 parcels to highest-density residential (20-40 dwelling units per acre), including mixed-use areas, to meet our housing targets. This was a most difficult undertaking and further points out the challenges that the County will face in finding suitable land, if we receive a further significant RHNA allocation as part of the 6th Cycle.

We are therefore requesting that SCAG consider the following as part of the 6th Cycle allocation process:

- A proportionality analysis be conducted that takes into account a jurisdiction’s ability to accommodate additional housing growth based on its current population.
- An infrastructure component be included to take into account those communities that lack the back-bone infrastructure to provide in-fill, urban-scale development.
- We support the concept of phasing housing allocations beyond a single RHNA cycle. This will provide for a more achievable phase-in for housing growth beyond the 8-year cycle frequency.
- A truly consultative process be established to allow jurisdictions to engage SCAG staff in meaningful discussions as draft housing targets are developed, so that local and sub-regional concerns can be better captured in the final allocations.

- An analysis be conducted to assess how infrastructure funding opportunities that SCAG participates in (through grants etc.), or can advocate for at the State-level, can be better aligned with SCAG-adopted housing targets. Consideration should be given to help prioritize funding for those jurisdictions that lack back-bone infrastructure yet are expected to provide for a significant share of the regional housing needs.

We appreciate the opportunity to provide these comments, and would very much appreciate the opportunity to have a more in-depth discussion with SCAG staff as this process moves forward.

Sincerely,



**Assistant TLMA Director
Community Development**

Juan C. Perez, Assistant CEO &
Director of Transportation and Land Management Agency

Cc: Board of Supervisors
Hon. Rusty Bailey, Riverside, RHNA Subcommittee Representative
Hon. Russell Betts, Desert Hot Springs, RHNA Subcommittee Alternate
Mr. Kome Ajise, SCAG Executive Director
George Johnson, CEO
Lisa Brandl, COO