



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

August 27, 2019

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

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. The County of Riverside has very significant concerns with the methodology options being considered by SCAG for the upcoming RHNA allocation processes. Those concerns are even further heightened by the most recent release by the State Housing and Community Development (HCD) of significantly expanded housing targets for Southern California. 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, for an unincorporated population of approximately 385,000. Of these 30,303, 17,578 (58%) were designated as non-market rate housing (moderate, low, and very low income). This total unit allocation was larger than any other jurisdiction within the SCAG region (except the City of Los Angeles, which had 82,002 allocated units with a population of over 4 million). In comparison, Los Angeles County (unincorporated) was allocated 30,145 total dwelling units (with an unincorporated population of 1,052,000), while San Bernardino County was allocated 39 units (with an unincorporated population of 311,000 – similar to Riverside County).

We have reviewed the recent SCAG release of methodology options to be considered for the 6th cycle. **Of the three options presented, it is our opinion that Option 2, which more closely takes into account each jurisdiction's share of the overall SCAG population (80% weight), combined with a consideration on High Quality Transit Areas (20% weight), most accurately allocates units in an equitable and feasible way.**

That being said, we note that even with this Option 2, Riverside County would be allocated an additional 10,861 units (both market date and affordable) using the SCAG estimator. Using the overall target numbers released by HCD on August 22, 2019, that number increases to 21,493 (or which 12,089 are moderate, low or very low income).

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, on in the Coachella Valley. There are few dense employment centers within the unincorporated areas. Any development that occurs within our jurisdiction 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, housing 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. Mandating higher density urban-level development in areas lacking basic infrastructure will cause additional strain on our over-burdened existing infrastructure, and on our communities.

We note that the RHNA 5th Cycle was based on the 2010 census data, with a population estimate of 502,392 used for Riverside County. In fact, given the above-mentioned incorporations, our County unincorporated 5th Cycle population was approximately 385,000. The current SCAG estimate for the unincorporated area is 394,200.

In order to more equitably distribute target numbers for the 6th Cycle, the population number that was incorrectly used for the 5th Cycle needs to be taken into consideration, rather than simply adding more units to the County through the 6th Cycle. This would also be consistent with the concept of phasing housing allocations beyond a single RHNA cycle, which the County supports.

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 further request that 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.

Respectfully,

A handwritten signature in black ink, appearing to read 'Juan C. Perez', with a long horizontal stroke extending to the right.

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