



September 3, 2019

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(760) 329-6411 • www.cityofdhs.org

Southern California Association
Of Governments (SCAG)
Attention: RHNA
900 Wilshire Boulevard, Suite 1700
Los Angeles, CA 90017
Via email: housing@scag.ca.gov

RE: Proposed Regional Housing Needs Assessment (RHNA) Allocation Methodology

SCAG,

The City of Desert Hot Springs has received the notice of Public Comment regarding the RHNA Allocation Methodology.

The California Government Code 65584.d. states that the regional housing needs allocation plan shall further the following objectives:

- Increase housing supply and the mix of housing types in an equitable manner
- Encourage efficient development patterns and reduce greenhouse gasses
- Improve intraregional nexus of jobs and housing
- Allocate a lower proportion of housing needs to an income category when a jurisdiction already has a disproportionately high share of housing in the income category.

Within the Coachella Valley, the City of Desert Hot Springs has, within the past, taken on almost half of the valley's housing needs. This highlights the disproportionate share of needs the City has dealt with under past allocations of RHNA.

The City of Desert Hot Springs has a median household income of \$34,059 (2012-2016 American Community Survey). About 64% of Desert Hot Springs residents are in the lower income categories, which is significantly higher than the Riverside County rate of 39%. Therefore, in order to comply with the code listed above, there should be a higher social equity adjustment for both existing needs and proposed needs.

Furthermore, the unemployment rate in Desert Hot Springs for April 2018 was 4.7%, which is again higher than the Riverside County rate of 3.8% (California Employment Development Department). The City does not have any major employment centers – the City's two supermarkets are the largest employers in the City. The proposed allocation should incorporate into the methodology a calculation that accounts for the relationship between high quality transit and job accessibility.

Demanding further allocations of low income housing in Desert Hot Springs (already a low income community) will further exacerbate the effect of concentrated poverty in the region, directly contradicting the state's objectives.

The City feels there should be a much higher social equity adjustment and a higher emphasis on high quality transit.

Rebecca Deming
Community Development Director