



# City of San Clemente City Manager

James Makshanoff, City Manager

Phone: (949) 361-8200 Fax: (949) 361-8309

[makshanoffj@san-clemente.org](mailto:makshanoffj@san-clemente.org)

September 4, 2019

Mr. Kome Ajise

Executive Director, Southern California Association of Governments

Attention: RHNA

900 Wilshire Boulevard, Suite 1700

Los Angeles, CA 90017

SENT VIA EMAIL: [housing@scag.ca.gov](mailto:housing@scag.ca.gov)

Dear Mr. Ajise,

Thank you for the opportunity to comment on the Proposed Regional Housing Needs Assessment (RHNA) Methodologies. The City of San Clemente appreciates the work and coordination the Southern California Association of Governments (SCAG) completed thus far for the 6<sup>th</sup> cycle RHNA allocations. The City of San Clemente is committed to increasing housing production and providing affordable housing options to address local needs. The City implements an inclusionary housing program and recently expanded an affordable housing overlay district to incentivize affordable housing production in the City's Mixed Use and Neighborhood Commercial zoning districts.

Between 1980 and 2010, San Clemente's population growth rates were higher than those rates experienced in Orange County. In addition, housing growth in San Clemente increased 26% between 2000 and 2010 which far outpaced the growth in Orange County. Population and housing growth rates have leveled off and SCAG forecasts very little population growth.

San Clemente is a coastal community and largely built out with limited development opportunities. San Clemente's 2017 Midterm Housing Element Update determined that the zoning for vacant and underutilized parcels in the City have the potential to yield only 634 units, which exceeds the City's 5<sup>th</sup> Cycle RHNA allocation. However, San Clemente does not have sufficient vacant or underutilized parcels to accommodate anywhere near the 1,300 to 4,000 additional housing units that SCAG's proposed methodologies would allocate to the City. As an example, the proposed methodology option 1 would direct San Clemente to produce 2,751 new housing units, including 1,013 very-low units.

Category	5th Cycle	6th Cycle		
		Option 1	Option 2	Option 3
Very Low	134	1017	1029	372
Low	95	758	625	226
Moderate	108	817	720	261
Above Moderate	244	170	1386	502
<b>Total</b>	<b>581</b>	<b>2763</b>	<b>3760</b>	<b>1361</b>
Total Increase from 5th Cycle		375%	547%	134%

We would like offer the following comments and concerns regarding SCAG’s Proposed RHNA Methodologies:

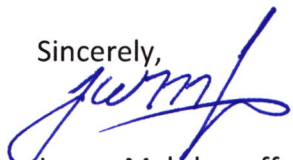
- Housing and Transportation. The HQTAs from the Regional Transportation Plan/Sustainable Communities Strategy may not account for eliminated bus routes. In addition, the HQTAs do not consider the very low potential to produce housing units and employment centers in cities like San Clemente. Our HQTAs have limited development potential, are physically constrained, and/or are historic.
- Funding. The allocation process lacks the support of funding sources to enable San Clemente and other municipalities to produce the required housing units. The provision of affordable housing requires significant financial investment.

In addition to the San Clemente specific comments above, we would like to echo the comments in the letter from the Orange County Council of Governments, including:

- Local input is critical to creating a feasible allocation and should be included in the methodology selected by SCAG.
- SCAG should reconsider redistributing the existing need above moderate units to the very low, low, and moderate income unit allocations.
- Housing and Transportation. Although the intent to connect housing and transportation is an important planning effort, the proposed methodologies do not guarantee or incentivize the HQTA population share units to be built in HQTA areas. Without the assurance that these units would be built in the HQTA areas, the housing and transportation disconnect could be further exacerbated.

The City continues to support and implement programs to increase housing production, including affordable housing. However, the 6<sup>th</sup> cycle proposed methodologies would put the City in a position in which we would be out of compliance with State law. After considering the options proposed by SCAG, San Clemente believes Option 3 to be the least objectionable option given Option 3’s use of local input.

Thank you for the opportunity to comment and we look forward to working with SCAG as we move forward on the 6<sup>th</sup> cycle RHNA allocation process.

Sincerely,  
  
 James Makshanoff  
 City Manager