



City of San Clemente City Manager

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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

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 6th 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 5th 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.