



**Community Development Department  
Planning Division**

14177 Frederick Street  
P. O. Box 88005  
Moreno Valley CA 92552-0805  
Telephone: 951.413-3206  
FAX: 951.413-3210

September 5, 2019

The Honorable Peggy Huang, Chair  
RHNA Subcommittee  
Southern California Association of Governments  
900 Wilshire Blvd, Ste. 1700  
Los Angeles, CA 90017

RE: 6th Cycle Regional Housing Needs Assessment Allocation

Dear Ms. Huang,

The City of Moreno Valley appreciates the opportunity to provide comments on the Regional Housing Needs Assessment (RHNA) draft methodology options for the SCAG region. It is important that the selected RHNA allocation methodology is equitable, achievable, and results in sustainable development.

The City of Moreno Valley has reviewed each of the three RHNA draft methodology options released for public input. Based on our review, the City of Moreno Valley supports Option 2 as the preferred option for the region due to the following reasons:

1. Of the three options, Option 2 is the least complex of the methodologies, which facilitates ease of interpretation.
2. Both Option 1 and Option 3 allocate disproportionate numbers of housing units to areas that are far from job centers. This adds to increased travel, regional congestion, increasing emissions, and negative impacts to air quality and overall quality of life. Neither Option 1 nor Option 3 RHNA methodology appear to fully align with the State's goals of infill development, social equity, and environmental sustainability, nor do they further the State's objective of an improved balance between the number of low-wage jobs and the number of housing units affordable to low-wage workers in each jurisdiction. In fact, they appear to work against this objective. The RHNA should strive for more low-income housing in high job-opportunity cities, but using local inputs does the opposite: it pushes housing growth to the cities farthest from job opportunities simply because there is land to build on, and thus higher projected household growth.
3. Option 2 is the most objective choice as it is strictly based on population share and access to high-quality transit (HQTA), which will provide increased housing access to areas of high jobs and transit opportunity for lower-income residents.

For the reasons identified above, the City of Moreno Valley supports RHNA Methodology Option 2 for the SCAG Region.

Based on the relatively low level of housing development activity during the current housing cycle, which housing cycle has occurred during a time of improved economic conditions, it is not realistic to assume that HCD's need determination of 1,344,730 will be attainable, particularly if a forecasted economic slowdown occurs. The City of Moreno Valley thus also recommends that SCAG appeal the regional California Department of Housing and Community Development (HCD) housing need determination number of 1,344,730 units as overly burdensome.

The City of Moreno Valley appreciates the opportunity to provide input into the RHNA process. Should you have any questions, please contact me at [pattyn@moval.org](mailto:pattyn@moval.org) or by phone at 951-413-3354.

Sincerely,

A handwritten signature in black ink that reads "Patty Nevins". The signature is written in a cursive, flowing style.

Patty Nevins  
Planning Official