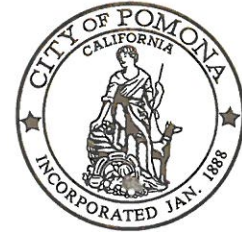


# THE CITY OF POMONA

Development Services Department



September 5, 2019

The Honorable Peggy Huang, Chair  
Regional Housing Needs Assessment Subcommittee  
Southern California Association of Governments  
Attention: RHNA  
900 Wilshire Boulevard, Suite 1700  
Los Angeles, CA 90017

Sent via email:  
housing@scag.ca.gov

Subject: Regional Housing Needs Assessment (RHNA) Methodology options

Chair Huang & Members of the RHNA Subcommittee:

On behalf of the City of Pomona, thank you for the opportunity to provide comments on the Regional Housing Needs Assessment ("RHNA") methodology options provided by the Southern California Association of Governments ("SCAG") Subcommittee. The housing shortage in California is a serious issue with far reaching social and economic effects that requires a multipronged housing strategy at the State, regional and local levels. The City of Pomona ("City") has been actively strengthening its housing policies, emphasizing a shift toward the development of existing vacant and underutilized parcels in the multi-family residential zones and updating our Specific Plans to focus and encourage high density residential and mixed-use projects near our transit centers. In addition, the City is also in the process of adopting an Accessory Dwelling Unit ("ADU") ordinance to encourage the development of accessory dwelling units to incrementally increase housing supply in established single-family neighborhoods, as well as pursuing inclusionary housing regulations to further increase affordable housing development throughout the City.

With respect to the three methodologies offered for review and comment, the City has the following remarks:

**Option One** endeavors to distinguish between existing and projected need, consider previous housing construction levels and High-Quality Transit Areas ("HQTA"), while also allowing local input to qualitatively factor into a jurisdictions allocation. As currently drafted, this methodology would result in an over-concentration of lower-income units allocated to the City and other Cities with both a large HQTA and existing significant lower-income populations. This methodology seems contrary to the objectives of the 6<sup>th</sup> Cycle RHNA which requires the methodology to affirmatively further fair housing.

**Option Two** is the preferred methodology for the City of Pomona as it provides a more straight-forward, quantitative calculation based on population, HQTAs and a social equity adjustment. However, we offer the following recommendation to improve this methodology: Adjust the HQTAs calculation to utilize the 2040 HTQA maps in the adopted 2016 Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS). As stated in the RTP/SCS, while existing HQTAs account for only three percent of total land area in the SCAG region, they are planned and projected to accommodate 46 percent of the region's future household growth and 55 percent of the future employment growth. Additionally, SCAG's own analysis shows that lower-income persons are more likely to live in HTQAs, so it seems logical that expanding the methodology to include those future HQTAs in the transit allocation would result in reducing an overconcentration in specific HQTAs and encourage equitable distribution of housing by building housing that is situated around existing transit and where future transit is planned.

**Option Three** proposes to use local input as the main factor in determining a total draft RHNA allocation. Local inputs rely on projections of household growth under existing zoning. Using them as a basis for RHNA works against RHNA goals because it pushes more housing to parts of the region with fewer jobs and lower incomes. Cities in Los Angeles County closest to abundant job opportunities are mostly "built out" under existing zoning, and therefore have a relatively low projected household growth. These cities could, however, accommodate housing by rezoning land strategically. The RHNA goal should be to increase access to areas of high opportunity for lower-income residents and push for more low-income housing in high opportunity cities; but using local inputs does the opposite. It pushes housing growth to the cities farthest from job opportunities – which have land to build on, and thus higher projected household growth, unfairly putting additional burden on cities such as Pomona.

Thank you again for the opportunity to comment on the proposed methodologies and we thank SCAG staff for their efforts in putting these methodologies forward for consideration. Should you have any follow-up questions, please feel free to contact me at (909) 620-2421.

Sincerely,

*Anita Gutierrez*

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