

# City of Alhambra

Office of the City Manager

September 9, 2019

Honorable Peggy Huang  
Regional Housing Need Assessment  
Subcommittee Southern California  
Association of Governments 900  
Wilshire Boulevard, Suite 1700  
Los Angeles, CA 90017

## **RE: Regional Housing Needs Assessment (RHNA) Methodology**

Dear RHNA Subcommittee Chair Huang,

On behalf of the City of Alhambra, I am writing to comment on the proposed RHNA allocation methodologies that were released earlier this month and recommend our support for Methodology Option 3. But first, I would like to thank the Southern California Association of Governments (SCAG) and the RHNA Subcommittee for developing the proposed methodologies for the SCAG region and for the opportunity to comment on these methodologies.

The City of Alhambra requests that the final methodology should do the following:

- Acknowledge recent housing development;
- Acknowledge existing growth constraints;
- Use consistent and meaningful terminology by aligning the definition of High Quality Transit Areas (HQTA) with Cap and Trade for the purposes of RHNA;
- Use local input as the foundation;
- Be accurate, equitable, and defensible;
- Acknowledge the role of local governments in constructing housing.

### **Acknowledge Recent Housing Development**

The City of Alhambra has facilitated the development of a large number of housing units during the fifth RHNA cycle. These developments include restricted very low- income and low-income housing units. Options 2 and 3 of the proposed RHNA methodologies do not include credit for these housing developments. Option 1 focuses on household creation, which tends to be higher in jurisdictions that have created more housing units. In fact, Option 1 applies a higher ideal vacancy rate to rental housing units, which increases the need for additional housing units in jurisdictions that have already developed housing units in recent years. Finally, the inclusion of vacancy rate and overcrowding on the jurisdiction level is unsuitable given that the cause of housing need and associated vacancy and overcrowding is due to regional factors outside of local jurisdictions' control.



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The City recommends that the final RHNA methodology should provide a credit to those jurisdictions where housing construction occurred during the fifth RHNA cycle.

### **Acknowledge Existing Growth Constraints**

The finalized methodology should recognize existing constraints to housing growth in urban communities, such as open space deficits, incompatible industrial uses, environmental contamination, and high levels of existing density. The City of Alhambra is concerned that existing zoning regulations and land value may inhibit our abilities to create additional housing units. The draft RHNA methodologies include consideration of constraints such as open space and habitat and wildlife areas, applicable to already lower-density suburban locations, whereas the constraints facing urban areas are not considered.

The City of Alhambra includes major freeway corridors (I-10, I-710) that require adequate buffers around those locations from housing developments. For example, since 2005, the California Air Resources Board has warned against building new homes in high-pollution zones within 500 feet of freeways, due to the strong linkage between traffic pollution and rates of asthma, heart attacks, and other health problems. While design features can minimize these risks, air pollution rates in these areas remain high and have large health impacts on their residents.

The City of Alhambra also lacks open space, amenities, and quality infrastructure and has existing environmental hazards that impact the health of existing residents and represent constraints for additional housing development. According to CalEnviroScreen 3.0, the vast majority of City of Alhambra is identified as disadvantaged by various metrics given its surrounding environmental hazards, health factors, and socioeconomic demographics.

Further, the City of Alhambra is built out with a population density currently exceeding the City of Los Angeles by 1.5 times and LA County by 4.5 times.

Additionally, the City is home to areas that are permanently protected open space, such as local parks, flood channels and HOA open space, and areas that are unsuitable or unavailable for resident uses, such as the I-710 terminal and surroundings.

Consideration of these constraints that face our city should be incorporated into the final methodology.

**Use consistent and meaningful terminology by aligning the definition of High Quality Transit Areas (HQTA) with Cap and Trade for the purposes of RHNA**

Options 1 and 2 allocate housing based on the jurisdiction's share of regional population within an HQTA. The City supports improving the linkage between new, higher density housing and frequent reliable transit service. Affirming this could also help the region meet mobility and air quality goals. However, we recognize that how the new housing numbers and associated income distribution is allocated to jurisdictions could raise concerns regarding the potential over-concentration of particular income groups and/or the potential to displace existing residents. Additionally, QTAs are not evenly distributed across the region. Given the significant repercussions to jurisdictions that do not site the units allocated, it is important that the process results in a distribution that is achievable. An allocation approach that emphasizes the factors that are critical for agencies being eligible for funding and to actually achieve ("build") the allocated housing units should be heavily-weighted in the selected approach.

To help link the RHNA allocations with available funding, the final methodology should align the criteria for RHNA allocations at major transit stops with the definition of an HQTA in the FY17- 18 Round 4 Affordable Housing and Sustainable Communities Program (AHSC) Guidelines. This will help to avoid overlapping terms/definitions and to provide better funding potential by ensuring that QTAs are within already-defined areas. The definition of HQTA according to the AHSC Guidelines can be found below:

"High Quality Transit" means a qualifying transit line with high frequencies and permanent infrastructure as follows: (1) Frequency: High Quality Transit must have peak period headway frequency of 15 minutes or less and service on seven days a week. (2) Permanent Infrastructure: High Quality Transit must operate on a railway or be transit service with Bus Rapid Transit features that either fully or partially operate on a dedicated bus-only lane, or uses High Occupancy Vehicle (HOV) or High Occupancy Toll (HOT) lanes.

**Use local input as the foundation for the final methodology**

Local input has always been a foundational component of SCAG's RHNA planning process, and for good reason. Local input provides a real-world perspective of local housing opportunities and constraints at an individual, jurisdiction level – a perspective that is not present in a one-size-fits-all RHNA allocation factor (i.e. jurisdiction's share of the regional population). Local input provides the backbone, linking RHNA to SCAG's Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) – also known as Connect SoCal – by identifying areas within the region sufficient to house an eight-year projection of the regional housing need, as called forth with the adoption of SB 375. This information is also utilized by the local transportation commissions in their planning and programming of major transportation and infrastructure projects and SCAG in its regional planning. Utilizing local input integrates transportation and land use planning.

We support the bottoms-up approach SCAG used to derive local input over a 1.5-year long process in which SCAG solicited input from all 197 jurisdictions on population, housing, and employment for 2016-2045; parcel-level General Plan land uses, existing 2016 land uses, and zoning; and the extensive surveys collecting information on policies and best practices incorporated into local planning. Each jurisdiction submitted projected housing development numbers to SCAG as part of the local input process. The selected RHNA methodology therefore should ensure that any number assigned to a jurisdiction captures, at a minimum, the number of units a jurisdiction identified through the local input process. For example, if a jurisdiction projected it would build 8,000 units, but the selected RHNA methodology only gives that jurisdiction 5,000 units, there should be an adjustment to provide that missing 3,000 units to the jurisdiction, rather than distribute the 3,000 to other jurisdictions. This respects local input and ensures equity for other jurisdictions not be overburdened.

**Be accurate, equitable, and defensible**

Given the significant repercussions for ours and other cities and counties that do not site the units allocated, it is important that the process results in a distribution that is based on the most accurate data, is equitable across the region, and is defensible.

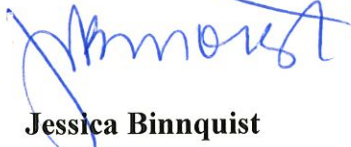
**Acknowledge the limited role of local government in constructing housing**

The final methodology should acknowledge that it is not municipalities that build housing but the private sector. RHNA planning targets should not be conflated with housing production. Alhambra has planned to meet housing needs, and is in compliance with its housing element plan. In reality, a more fundamental challenge is the number of permit requests received relative to the number of housing units planned and zoned for under RHNA apportionments. Again, the reality is that fewer applications than the RHNA allocations are filed for reasons outside of our control. For example, market forces, including the lack of state funding and the increased constraints on construction funding and mortgage qualifications imposed by lenders, play a major role in whether housing is constructed in a community. The final methodology should acknowledge this fact and, throughout the RHNA discussions, be sure to not conflate RHNA targets with housing production.

In conclusion, the City of Alhambra deeply appreciates the inclusive stakeholder process SCAG has undertaken, and we look forward to continued opportunities to comment on specific proposals. For the reasons stated above, should the final housing numbers be implemented, we strongly request that the Methodology Option 3 be selected. Option 3 represents the most appropriate in consideration of all concerns raised.

Sincerely,

THE CITY OF ALHAMBRA



**Jessica Binnquist**  
City Manager