



City of San Marino

September 10, 2019

The Honorable Peggy Huang, Chair
Regional Housing Needs Assessment Subcommittee
Southern California Association of Governments
900 Wilshire Boulevard, Suite 1700
Sent via e-mail to: housing@scag.ca.gov

RE: Proposed Regional Housing Needs Assessment (RHNA) Methodology

Dear RHNA Subcommittee Chair Huang,

Thank you for the opportunity to provide comments on the proposed Regional Housing Needs Assessment (RHNA) methodology options provided by the SCAG subcommittee. As we all know, California has a serious shortage of housing. This limited supply impacts affordability levels pricing out many lower and middle income families. Before providing comments on the methodology, I would first like to thank the Southern California Association of Governments (SCAG) and the RHNA Subcommittee for developing the proposed methodologies for the SCAG region. I would also like to take this opportunity to reference the comment letter (dated September 9, 2019) provided by the San Gabriel Valley Council of Governments (COG) and state that the City of San Marino echoes the COG's comments and concerns.

Like many cities, San Marino is committed to doing its part to take on the housing challenge and has worked on ensuring that the City has not only satisfied its fair share of housing, but has surpassed the City's housing obligation. This has been true despite the challenges of being a small jurisdiction where vacant land is not readily available. After a careful review of the three methodology options, we would like to submit the following comments/concerns:

I. Potential for unattainable RHNA obligations and impacts for non-compliant Housing Element.

Based on the recently released HCD regional need of 1,344,740 units, both of SCAG's proposed Methodologies 1 and 2 would result in unattainable RHNA allocation numbers for the City of San Marino. Housing Element Law requires that cities identify sites in their Housing Elements to meet their allocated RHNA numbers. Under State law, cities are tasked with locating adequate vacant sites, where possible, and nonvacant sites with a realistic capacity for development, if vacant sites are not available. The estimated RHNA numbers for the City under Methodologies 1 and 2 are beyond the City's realistic capacity for development. While increases in RHNA allocations for various jurisdictions may reflect the extent of the housing crisis, it makes no sense to allocate RHNA numbers to cities that they simply cannot meet in the 8-year planning period, especially given the penalties for jurisdictions that are unable to identify adequate sites to meet their RHNA obligations.

2. The selected methodology must incorporate local input / data.

Any methodology that ignores local input/data undermines the critical role that cities play in determining the appropriate RHNA allocation. Local input provides a real-world perspective of local housing opportunities and constraints at an individual, jurisdictional level, which is a perspective that is not present in a one-size-fits-all RHNA allocation. Each jurisdiction submitted projected housing development numbers to SCAG as part of the local input process. This figure (14 units) is identified in the calculations table provided by SCAG. The selected RHNA methodology therefore should ensure that any number assigned to the City is strongly correlated with the number of units the City identified through the local input process.

In summary, San Marino strongly opposes Methodologies 1 and 2. Those methodologies ignore local input and result in potentially unattainable RHNA allocations. While none of the methodologies are perfect, Methodology 3 most appropriately reflects the realistic capacity for development and thereby aligns most closely with the substantive Housing Element requirements in State law.

The RHNA and subsequent Housing Element update process allows communities to plan for housing development and growth, which collectively allows the entire region to improve access to jobs, promotes transportation mobility, and addresses social equity and fair share housing needs. We understand that the provision and allocation of housing needs is both a vital and

exceptionally complex issue. Thank you again for the opportunity to provide feedback on this process.

Sincerely,



ALDO CERVANTES

Planning and Building Director



