

September 11, 2019

Dear Southern California Association of Governments,

The Regional Housing Needs Assessment (RHNA) as it is currently implemented is the antithesis of Smart Growth.

The policy, designed to force the production of housing within the State of California without local comment or appeal, deliberately ignores the most basic elements of a community's infrastructure such as fire safety and water.

Forced RHNA development without allowing for public input once the final allocations are determined has increasingly led to tragic results around the State. We can expect more if SCAG accepts the 1.34 million unit housing figure that the California Department of Housing and Community Development projected.

### RHNA Ignores Fire Safety

RHNA has forced communities to identify areas for development that are not suitable for residential construction in foothills and mountain communities. One example is the Camp Fire that engulfed the community of Paradise, CA leading to 81 deaths and the damage or destruction of 18,000 structures.

Prior to the Camp Fire, Paradise was cited in an SB 35 Determination Letter as not having met 'sufficient progress towards their Above Moderate income RHNA...' The Letter of Determination cited that Paradise was subject to SB 35 'streamlining' the approval process for multi-family housing.

Months after the January 13, 2018 Letter of Determination was published, the November 2018 Camp Fire completely destroyed the community of Paradise proving how dangerous RHNA is when it ignores infrastructure in order to implement California housing targets.

SB 35 Statewide Determination Summary		
Cities and Counties Subject to SB 35 Streamlining Provisions		
When Proposed Developments Include $\geq$ 10% Affordability		
When jurisdictions have insufficient progress toward their Above Moderate income RHNA and/or have not submitted the most recent Annual Progress Report (2016), these jurisdictions are subject to SB 35 (Chapter 366, Statutes of 2017) streamlining for proposed developments with at least 10% affordability.		
These conditions currently apply to the following 378 jurisdictions:		
JURISDICTION	JURISDICTION	JURISDICTION
211 MILLBRAE	251 PISMO BEACH	291 SAN DIMAS
212 MODESTO	252 PLEASANT HILL	292 SAN GABRIEL
213 MODOC COUNTY	253 PLYMOUTH	293 SAN JACINTO
214 MONTAGUE	254 POINT ARENA	294 SAN JOAQUIN
215 MONTCLAIR	255 POMONA	295 SAN JOAQUIN COUNTY
216 MONTEBELLO	256 FORT HUENEME	296 SAN JUAN BAUTISTA
217 MONTEREY	257 PORTERVILLE	297 SAN LEANDRO
218 MONTEREY PARK	258 PORTLAND	298 SAN MATEO COUNTY
219 MORAGA	259 POWAY	299 SAND CITY
220 MORENO VALLEY	260 RANCHO CORDOVA	300 SANGER
221 MORRO BAY	261 RANCHO MIRAGE	301 SANTA BARBARA
222 MOUNT SHASTA	262 RED BLUFF	302 SANTA CLARITA
223 MURRIETA	263 REDDING	303 SANTA CRUZ COUNTY
224 NATIONAL CITY	264 REDLANDS	304 SANTA MONICA
225 NEEDLES	265 REDONDO BEACH	305 SANTA PALULA
226 NEVADA CITY	266 REDWOOD CITY	306 SANTA ROSA
227 NEWARK	267 REEDLEY	307 SANTEE
228 NEWMAN	268 RIALTO	308 SARATOGA
229 NORCO	269 RICHMOND	309 SAUSALITO
230 NORWALK	270 RIDGECREST	310 SCOTT'S VALLEY
231 NOVATO	271 RIO DELL	311 SEAL BEACH
232 OCEANSIDE	272 RIO VISTA	312 SEASIDE
233 OJAI	273 RIPON	313 SEBASTOPOL
234 ONTARIO	274 RIVERBANK	314 SELMA
235 ORANGE	275 RIVERSIDE	315 SHAFTER
236 ORANGE COVE	276 RIVERSIDE COUNTY	316 SHASTA COUNTY
237 ORLAND	277 ROHNERT PARK	317 SHASTA LAKE
238 OROVILLE	278 ROLLING HILLS	318 SIERRA COUNTY
239 OXNARD	279 ROLLING HILLS ESTATES	319 SIERRA MADRE
240 PACIFIC GROVE	280 ROSEMead	320 SIGNAL HILL
241 PACIFICA	281 SACRAMENTO	321 SISKIYOU COUNTY
242 PALM DESERT	282 SACRAMENTO COUNTY	322 SOLANA BEACH
243 PALM SPRINGS	283 SALINAS	323 SOLEDAD
244 PALMDALE	284 SAN BENITO COUNTY	324 SOLVANG
245 PALOS VERDES ESTATES	285 SAN BERNARDINO	325 SONOMA
246 PARADISE	286 SAN BERNARDINO COUNTY	326 SONORA
247 PARAMOUNT	287 SAN BRUNO	327 SOUTH EL MONTE
248 PASADENA	288 SAN BRUNO COUNTY	328 SOUTH GATE

Other fires where housing was built to meet RHNA housing targets:

- Cedar Fire (2003 San Diego) - 15 deaths, 2,820 structures destroyed
- Carr Fire (2018 Shasta/Trinity) – 8 deaths, 1,650 structures destroyed
- Thomas Fire (2017 Ventura/Santa Barbara) – 23 deaths, 1,063 structures destroyed

While some of these locations are out of the jurisdiction of SCAG, it does identify the disconnect between the California Department of Housing and Community Development projections and the real-world effects it has on the lives of Californian's.

**RHNA Ignores Water Availability**

RHNA has forced cities to produce new housing where water supply is unreliable. In the 5<sup>th</sup> Cycle Allocation Plan for the 2014-2021 projection period, the Southern California Association of Governments (SCAG) determined the City of Los Angeles would have to produce 82,000 new housing units to meet growth estimates produced by the California Department of Finance.

Prior to the 5<sup>th</sup> Cycle Determination, the City of Los Angeles in was forced to enact the 2010 Emergency Water Conservation order forcing residents and businesses to reduce their water consumption during this period of drought. In 2015 the City of Los Angeles transitioned from Phase II conservation to Phase III to further decrease residential and commercial water consumption. During the 2012 to 2016 drought, the City of Los Angeles continued to meet it obligation to construct 82,000 housing units even though there is substantial evidence that the city did not have sufficient supply which even included shutting down the Los Angeles Aqueduct because of a lack of water and relying on the Metropolitan Water District to prop up its supply even while MWD was drawing on and drawing down its own emergency supplies .

RHNA does not require there exists substantial evidence of water supply for development. There are no checks and balances during the approval process that real water exists.

In another example, an article ‘Nine Cities Running Out of Water’ described nine central valley communities that were running out of water during the 2012 to 2016 State of California declared drought. While these cities were running out of water, the 5<sup>th</sup> Cycle RHNA required substantial growth that required additional water when there was none. One example (see chart) required Bakersfield to provide an additional 36,291 housing units. This level of housing required over 10,000 acre feet of new water which could not be accessed because of falling ground water levels.

9 Cities Running Out of Water	RHNA units	Est new water demand (af)	Reference
Bakersfield	36,291	10,414	<a href="http://www.kerncog.org">http://www.kerncog.org</a>
Sacramento	24,101	5,245	<a href="http://www.sacog.org/">http://www.sacog.org/</a>
Chico	3,945	1,213	<a href="http://www.bcag.org/">http://www.bcag.org/</a>
Lancaster/Palmdale	6,079	1,590	<a href="http://www.scag.ca.gov">http://www.scag.ca.gov</a>
Yuba City	4,676	1,374	<a href="http://www.sacog.org/">http://www.sacog.org/</a>
Fresno	22,844	6,607	<a href="http://www.fresnocog.org/">http://www.fresnocog.org/</a>
Modesto	7,094	2,198	<a href="http://www.stancog.org/">http://www.stancog.org/</a>
Merced	5,537	1,881	<a href="http://www.mcgov.org/">http://www.mcgov.org/</a>
Hanford	4,832	1,297	<a href="http://www.kingscog.org/">http://www.kingscog.org/</a>
<small>www.droughtmath.com</small>			

**The 6<sup>th</sup> Cycle Determination**

SCAG's 5th Cycle Final Allocation plan of 412,000 new units is miniscule compared to the California Department of Housing and Community Development 6th Cycle Determination of an insanely 1.3 MILLION new housing units.

The new ‘Overcrowding Adjustments’ and ‘Cost of Burden Adjustments’ found in the 6th Cycle Determination to SCAG are wildly speculative estimates that have no use in California's housing projections. RHNA's projections must meet the reality of infrastructure and water supply.

The RHNA process can never have safe communities or a reliable water supply unless serious reforms are made to RHNA.

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