



September 11, 2019

Honorable Peggy Huang, Chair
Regional Housing Needs Assessment Subcommittee
Southern California Association of Governments
900 Wilshire Blvd., Suite 1700
Los Angeles, CA 90017
SENT VIA EMAIL: housing@scag.ca.gov

RE: Proposed Regional Housing Needs Assessment (RHNA) Allocation Methodology

On August 2, the Southern California Association of Governments (SCAG) released proposed RHNA methodologies for review and comment. On August 22, the California Department of Housing and Community Development (HCD) released the Regional Housing Need Determination for the 6th RHNA cycle covering 2021-2029. HCD allocated a total of 1,344,740 housing units to the six-county SCAG region. For comparison, the 5th RHNA cycle covering 2013-2021 allocated 412,137 units.

The City of Glendora appreciates the opportunity to review the three methodologies. Considering the number of housing units allocated to the region, the process poses a tremendous challenge for SCAG and its constituent cities. As SCAG moves toward a final decision on the distribution methodology, the City of Glendora requests your consideration of the following comments.

San Gabriel Valley Council of Governments (SGVCOG)

The City of Glendora is a member of the SGVCOG, and we generally concur with the comments contained in their letter to SCAG dated September 9, 2019 regarding the proposed methodologies. In particular, we encourage SCAG to carefully consider the comments regarding existing growth constraints, using local input as the foundation of the final methodology, and the limited role of local government in constructing housing.

Expanding on those comments, we want to point out that the City of Glendora has reported the construction of nearly 600 units to HCD since 2013. For Glendora, where virtually all of the developable land is improved with homes and businesses, 600 new housing units is an impressive number. This level of building activity is due to favorable market conditions and, to a lesser degree, the City's zoning regulations and processes.

Development in Glendora is largely attributable to rising real estate prices and demand for housing. Real estate investors have been aggressive in their pursuit of land, and prices have convinced property owners to sell income producing assets. Indeed, the market is the most powerful force to encourage housing development. The fact that in many cases land costs also

include the acquisition of occupied buildings, substantially increasing the cost of development, is clear evidence of a robust market.

To anticipate and plan for investment in the local real estate market, the City of Glendora has expended substantial resources to create specific plans along its major commercial corridors and near future transit. These specific plans increase residential density and dramatically expand areas where new housing can be developed. Zoning regulations, however, are far less influential on development than market factors, which the City does not control.

RHNA, the California Environmental Quality Act (CEQA) and potential litigation

Pursuant to Section 15283 of the CEQA Guidelines, CEQA does not apply to a regional housing needs determination made by HCD. Actions that cities may take in order to comply with the 6th cycle RHNA, and obtain a certified housing element, are not exempt from CEQA.

Considering the 1,344,740 housing unit determination, and the proposed SCAG distribution methodologies, many cities may find that their zoning and general plans do not provide sufficient capacity and opportunities for housing. To achieve compliance and avoid the negative consequences of non-compliance, many cities may need to make significant changes to existing land use policies. Again, unlike RHNA, local land use policy changes that create foreseeable environmental impacts are subject to CEQA review.

The increasing complexity of CEQA and litigation over environmental issues will directly impact how quickly cities can respond to their RHNA allocation. To the extent that public input and similar factors are considered, major general plan amendments require extended periods to complete. Additionally, general plan amendments that increase residential densities are more likely to attract litigation from parties objecting on environmental grounds. Such litigation could delay full implementation of the 6th RHNA cycle for a very long time.

Land development of any kind is inherently controversial in urbanized communities, notwithstanding other major challenges to adequately house California's large population. We hope that SCAG will encourage HCD to reduce the Regional Housing Need Determination. While more housing is needed, such high housing numbers risk long delays due to protracted CEQA litigation. Certainly, this is not the outcome that anyone desires.

Consideration for Housing Proximity to Job Centers, Environmental and Social Impacts

The three proposed RHNA methodologies are somewhat different in their approach, but all follow a pattern promulgating local land use policies that broadly distribute housing development throughout the region. This pattern is intended to produce a fair and equitable outcome, but it perpetuates sprawling development that is unsustainable and functions to compete against other State laws and policies.

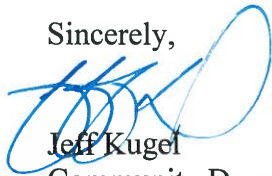
The approach to planning for housing in the SCAG region has no relationship with the location of major employment centers. This contributes to negative environmental impacts and forces workers to travel ever longer distances between their homes and jobs. Building and maintaining infrastructure to support longer commutes is unsustainable and imposes greater burdens on residents, government, and the economy. In fact, lower income households are disproportionately

impacted as they are forced to travel longer distances for housing, while increasing household costs for transportation to employment centers. No amount of government investment in affordable housing and public transit will adequately address this problem.

Laws intended to improve air quality and reduce environmental impacts are focused on reducing vehicle miles travelled (VMT). Likewise, State and regional planners encourage policies to promote reduced parking requirements, improved bicycle infrastructure, and public transportation. The prospect of these policies succeeding is diminished by housing policy that does not consider proximity to jobs. Creating a RHNA distribution that emphasizes housing near jobs will reduce the cost of commuting, promote better air quality, and benefit the economy and environment. Consequently, we encourage SCAG to include a factor in the RHNA methodology that distributes housing near employment centers.

On behalf of the City of Glendora, I want to extend our appreciation to SCAG and acknowledge the efforts to include all stakeholders in the RHNA process. Should you need additional information on these comments, please contact me at jkugel@cityofglendora.org, or (626) 914-8215.

Sincerely,



Jeff Kugel
Community Development Director