



September 12, 2019

Kome Ajise, Executive Director
Southern California Association of Governments
900 Wilshire Boulevard, Suite 1700
Los Angeles, CA 90017

RE: Proposed Regional Housing Needs Assessment (RHNA) Methodology

Dear Mr. Ajise,

City of Dana Point appreciates efforts that the RHNA Subcommittee and SCAG staff have put forth to develop the RHNA allocation methodology options for the 6th Housing Element planning period from 2021 through 2029. The City understands the challenges of generating an equitable and compliant methodology that applies to every jurisdiction within the SCAG region.

Dana Point is committed to its strategy for the maintenance and development of housing to meet the needs of existing and future residents of all income levels. However, the City is concerned with each SCAG member jurisdiction's ability to accommodate the California Department of Housing and Community Development (HCD) determination of 1,344,740 units in the 6th Cycle planning period. As such, Dana Point supports SCAG staff's recommendation to file an objection to HCD for the 6th Cycle RHNA determination.

After careful review of the three methodology options, we submit the following comments and strongly recommend our support for methodology Option 3:

1. Include local input with population projection as the basis of the final methodology

Local input provides a tangible perspective of each jurisdiction's housing opportunities and constraints, as well as the integration of transportation and land use planning through coordination with SCAG's Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). Failure to utilize local input in the RHNA methodology would conflict with California Government Code Section 65584.04(e) to include data available from local governments to include factors to develop the RHNA methodology.

2. Affirm definition of High Quality Transit Areas (HQTA)

During the RTP/SCS Local Input process, SCAG and OCTA staff determined that the Catalina Express operation at Dana Point Harbor is not an HQTA or Major Transit Stop, based on SB 375. Over 90% of ridership is visitor-recreation serving and the service does not function as a commuter ferry terminal. Year round, service from Dana Point to Avalon is limited to one round trip per day, with the exception of two round trips on Sundays and Fridays. Furthermore, the site does not have direct linkage to high quality transit routes. Dana Point supports aligning the definition of HQTA with Cap and Trade Guidelines to link projects with available funding sources for purposes of RHNA.

Harboring the Good Life



3. Acknowledge Existing Growth Constraints

Environmental and physical constraints, including designation of Fire Hazard Severity Zones, geologic hazards, sea level rise, and preservation of sensitive biological resources should be considered as factors in the RHNA methodology. These constraints vary with each jurisdiction, and should be evaluated as part of the local input process.

4. Revise Data Source for Demolition Permits

The input for demolition permits should reflect a net number of dwelling units rather than total permits from 2009 to 2018. The number provided in the metadata does not take into account demolition and reconstruction of existing dwelling units on the same parcel, especially existing units rebuilt from 2009 to 2013 period. In the case of Dana Point, 57 of the 60 units that were reported demolished in the metadata were rebuilt.

Furthermore, City of Dana Point is in full support of the technical letters submitted by Orange County Council of Governments and Center for Demographic Research at Cal State Fullerton regarding the RHNA methodology. Dana Point truly appreciates the ability to participate in the discussion and we look forward to future opportunities to comment on the recommended methodology. We strongly support that Methodology Option 3 be selected in consideration of our comments.

Sincerely,

CITY OF DANA POINT

A handwritten signature in black ink, appearing to read 'Matt Schneider'.

Matt Schneider

Director of Community Development

c: Dana Point City Council
Mark Denny, City Manager
Marnie Primmer, OCCOG Executive Director
Belinda Deines, Senior Planner