



CITY OF EASTVALE
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September 12, 2019

The Honorable Peggy Huang, Chair
RHNA Subcommittee
Southern California Association of Governments
900 Wilshire Blvd. Suite 1700
Los Angeles, CA 90017

RE: 6th Cycle Regional Housing Needs Assessment (RHNA) Allocation

Dear Ms. Huang:

Thank you for the opportunity to comment on the 6th Cycle Regional Housing Needs Assessment (RHNA) Allocation. The US Census Bureau estimates that the number of housing units in the region is 848,597 as of 2018. As a member of the Western Riverside Council of Governments, Eastvale maintains the regional allocation of 1,344,749 new units represents a 64% increase over the number of existing homes in the entire region. Given the historical number of units constructed on an annual basis in our region the allocation is unobtainable in the RHNA cycle. The number of units allocated to Eastvale for the projection period beginning June 30, 2021 and ending October 15, 2029 is shown in the chart below:

Option	Housing Units	Increase over 5 th Cycle
1	3007	105%
2	3711	153%
3	3086	110%

Eastvale's allocation for the 5th RHNA cycle was 1,463 units. As shown in the chart above the allocation under the 6th RHNA cycle is unprecedented. The City is expected to build more than double the number of units in the last cycle. Given the diminished level of available land in the City, market conditions and economically unsustainable land use model the RHNA allocation is unrealistic and inconsistent with the objectives of the methodology and arguably unobtainable.

Pursuant to Gov. Code section 65584(d), SCAG's RHNA allocation methodology must further the following objectives:

(1) Increasing the housing supply and the mix of housing types, tenure, and affordability in all cities and counties within the region in an equitable manner, which shall result in each jurisdiction receiving an allocation of units for low and very low-income households.

(2) Promoting infill development and socioeconomic equity, the protection of environmental and agricultural resources, the encouragement of efficient development patterns, and the achievement of the region's greenhouse gas reductions targets provided by the State Air Resources Board pursuant to Section 65080.

(3) Promoting an improved intraregional relationship between jobs and housing, including an improved balance between the number of low-wage jobs and the number of housing units affordable to low-wage workers in each jurisdiction.

(4) Allocating a lower proportion of housing need to an income category when a jurisdiction already has a disproportionately high share of households in that income category, as compared to the countywide distribution of households in that category from the most recent American Community Survey.

(5) Affirmatively furthering fair housing.

Eastvale expresses concern over the RHNA allocation because the following requirements cannot be met:

- The distribution is not equitable because of the disproportionate requirement when compared to the last cycle;
- The distribution will not encourage efficient development patterns because the land area within the City of Eastvale is approximately 90 percent developed.
- The distribution will not achieve Eastvale's share of the region's greenhouse gas reductions targets provided by the State Air Resources Board pursuant to Section 65080 because the distribution of housing for the RHNA does not consider proximity to job centers and exacerbates the jobs housing imbalance;
- The distribution will not improve the intraregional relationship between jobs and housing because proximity to job centers and housing is not reduced. Presently nearly 1/4 of our population commute to Orange County for work; and
- The distribution will not promote infill development, because market conditions are not considered.

The City of Eastvale supports modification of the allocation to incorporate these concerns and those expressed by other cities, Western Riverside Council of Governments (WRCOG) and Southern California Association of Governments (SCAG). Should you have any questions or wish to meet regarding the allocation issues raised herein, please do not hesitate to contact my staff, Gina Gibson Williams, Community Development Director at (951) 903-4425.

Sincerely,

Bryan Jones
City Manager
City of Eastvale