



September 12, 2019

Honorable Peggy Huang
Regional Housing Need Assessment Subcommittee
Southern California Association of Governments
900 Wilshire Boulevard, Suite 1700
Los Angeles, CA 90017

Email: Housing@scag.ca.gov

RE: Regional Housing Needs Assessment (RHNA) Methodology

Dear RHNA Subcommittee Chair Huang,

On behalf of the City of Irwindale, we are writing to comment on the proposed RHNA allocation methodologies that were released earlier this month. We 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 and for the opportunity to comment on these methodologies.

About the City

The City of Irwindale is 9.5 square miles in size with the Santa Fe Dam Recreation Area occupying one-third (1/3) of the land in the City. Nearly one-half (1/2) of the City is zoned industrial (Heavy Manufacturing). The City currently has nine (9) active mining quarries, operating in compliance with State regulations (Department of Conservation & SMARA). These quarries are expected to continue activities for the next 50-plus years. The population of Irwindale is approximately 1,500, located in three areas of the city, separated by the mining quarries, the Santa Fe Dam Recreation Area, and the I-605 Freeway. The Irwindale Zoning Map is attached for reference (Attachment A).

The City of Irwindale requests that the final methodology should do the following:

- Acknowledge existing growth constraints;
- Use consistent and meaningful terminology by aligning the definition of High Quality Transit Areas (HQTA) with Cap and Trade for the purposes of RHNA;
- Use local input as the foundation;
- Be accurate, equitable, and defensible;
- Acknowledge the role of local governments in constructing housing.

Acknowledge Existing Growth Constraints

The finalized methodology should recognize existing constraints to housing growth in urban



communities, such as open space deficits, incompatible industrial uses, environmental contamination, and high levels of existing density. The City of Irwindale, along with the rest of the San Gabriel Valley cities, is concerned that existing zoning regulations and land value may inhibit local jurisdictions' abilities to create additional housing units. The draft RHNA methodologies include consideration of constraints such as open space and habitat and wildlife areas, and these constraints facing Irwindale in particular are not adequately considered.

Irwindale includes major freeways (I-605 and I-210), rail corridors, and intermodal facilities that require adequate buffers around those locations from housing developments. For example, since 2005, the California Air Resources Board has warned against building new homes in high-pollution zones within 500 feet of freeways, due to the strong linkage between traffic pollution and rates of asthma, heart attacks, and other health problems. While design features can minimize these risks, air pollution rates in these areas remain high and have large health impacts on their residents.

The large areas of permanently protected open space, such as the Santa Fe Dam Recreational Area and flood channels, along with the lack of amenities, quality infrastructure and existing environmental hazards that impact the health of existing residents and represent constraints for additional housing development. A number of our member agencies are identified as disadvantaged communities by CalEnviroScreen 3.0 (Attachment B). These cities were identified as disadvantaged communities given their surrounding environmental hazards, health factors, and socioeconomic demographics.

The active mining quarries throughout the City of Irwindale present another constraint unique to the city in providing housing developments because they are anticipated to be actively mined for 50-plus years.

Consideration of these constraints that face our city, should be incorporated into the final methodology.

Use consistent and meaningful terminology by aligning the definition of High Quality Transit Areas (HQTA) with Cap and Trade for the purposes of RHNA

Options 1 and 2 allocate housing based on the jurisdiction's share of regional population within an HQTA. The SGVCOG supports improving the linkage between new, higher density housing and frequent reliable transit service. Affirming this could also help the region meet mobility and air quality goals. However, we recognize that how the new housing numbers and associated income distribution is allocated to jurisdictions could raise concerns regarding the potential over-concentration of particular income groups and/or the potential to displace existing residents. Additionally, QTAs are not evenly distributed across the region. Given the significant repercussions to jurisdictions that do not site the units allocated, it is important that the process results in a distribution that is achievable. An allocation approach that emphasizes the factors that are critical for agencies being eligible for funding and to actually achieve ("build") the allocated housing units should be heavily-weighted in the selected approach.

To help link the RHNA allocations with available funding, the final methodology should align the

criteria for RHNA allocations at major transit stops with the definition of an HQTAs in the FY17-18 Round 4 Affordable Housing and Sustainable Communities Program (AHSC) Guidelines. This will help to avoid overlapping terms/definitions and to provide better funding potential by ensuring that HQTAs are within already-defined areas. The definition of HQTAs according to the AHSC Guidelines can be found below:

“High Quality Transit” means a qualifying transit line with high frequencies and permanent infrastructure as follows: (1) Frequency: High Quality Transit must have peak period headway frequency of 15 minutes or less and service on seven days a week. (2) Permanent Infrastructure: High Quality Transit must operate on a railway or be transit service with Bus Rapid Transit features that either fully or partially operate on a dedicated bus-only lane, or uses High Occupancy Vehicle (HOV) or High Occupancy Toll (HOT) lanes.

Use local input as the foundation for the final methodology

Local input has always been a foundational component of SCAG’s RHNA planning process, and for good reason. Local input provides a real-world perspective of local housing opportunities and constraints at an individual, jurisdiction level – a perspective that is not present in a one-size-fits-all RHNA allocation factor (i.e. jurisdiction’s share of the regional population). Local input provides the backbone, linking RHNA to SCAG’s Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) – also known as Connect SoCal – by identifying areas within the region sufficient to house an eight-year projection of the regional housing need, as called forth with the adoption of SB 375. This information is also utilized by the local transportation commissions in their planning and programming of major transportation and infrastructure projects and SCAG in its regional planning. Utilizing local input integrates transportation and land use planning.

We support the bottoms-up approach SCAG used to derive local input over a 1.5-year long process in which SCAG solicited input from all 197 jurisdictions on population, housing, and employment for 2016-2045; parcel-level General Plan land uses, existing 2016 land uses, and zoning; and the extensive surveys collecting information on policies and best practices incorporated into local planning. Each jurisdiction submitted projected housing development numbers to SCAG as part of the local input process. The selected RHNA methodology therefore should ensure that any number assigned to a jurisdiction captures, at a minimum, the number of units a jurisdiction identified through the local input process. For example, if a jurisdiction projected it would build 8,000 units, but the selected RHNA methodology only gives that jurisdiction 5,000 units, there should be an adjustment to provide that missing 3,000 units to the jurisdiction, rather than distribute the 3,000 to other jurisdictions. This respects local input and ensures equity for other jurisdictions not be overburdened.

Be accurate, equitable, and defensible

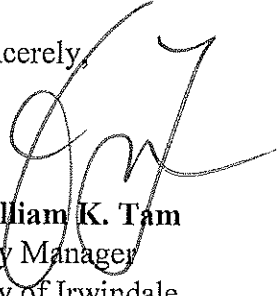
Given the significant repercussions for cities and counties that do not site the units allocated, it is important that the process results in a distribution that is based on the most accurate data, is equitable across the region, and is defensible.

Acknowledge the limited role of local government in constructing housing

The final methodology should acknowledge that it is not municipalities that build housing but the private sector. RHNA planning targets should not be conflated with housing production. For the most part, Irwindale has met the housing needs and is in compliance with our housing element plan. Many cities, including Irwindale, have fewer applications than their RHNA allocations for reasons outside of their control. For example, market forces, including the lack of state funding and the increased constraints on construction funding and mortgage qualifications imposed by lenders, play a major role in whether housing is constructed. Housing developers have acknowledged that siting residential development in Irwindale can be difficult due to the existing heavy industrial uses, industrial zoning, and active mining quarries. The final methodology should acknowledge this fact and, throughout the RHNA discussions, be sure to not conflate RHNA targets with housing production.

We appreciate the inclusive stakeholder process SCAG has undertaken, and look forward to continued opportunities to comment on specific proposals. Questions, inquiries, and comments can be directed to our Assistant City Manager, Theresa Olivares, at tolivares@irwindaleca.gov or (626) 430-2200 and/or our Community Development Manager/City Planner, Marilyn Simpson, at msimpson@irwindaleca.gov or 626-430-2209.

Sincerely,



William K. Tam
City Manager
City of Irwindale

Attachments

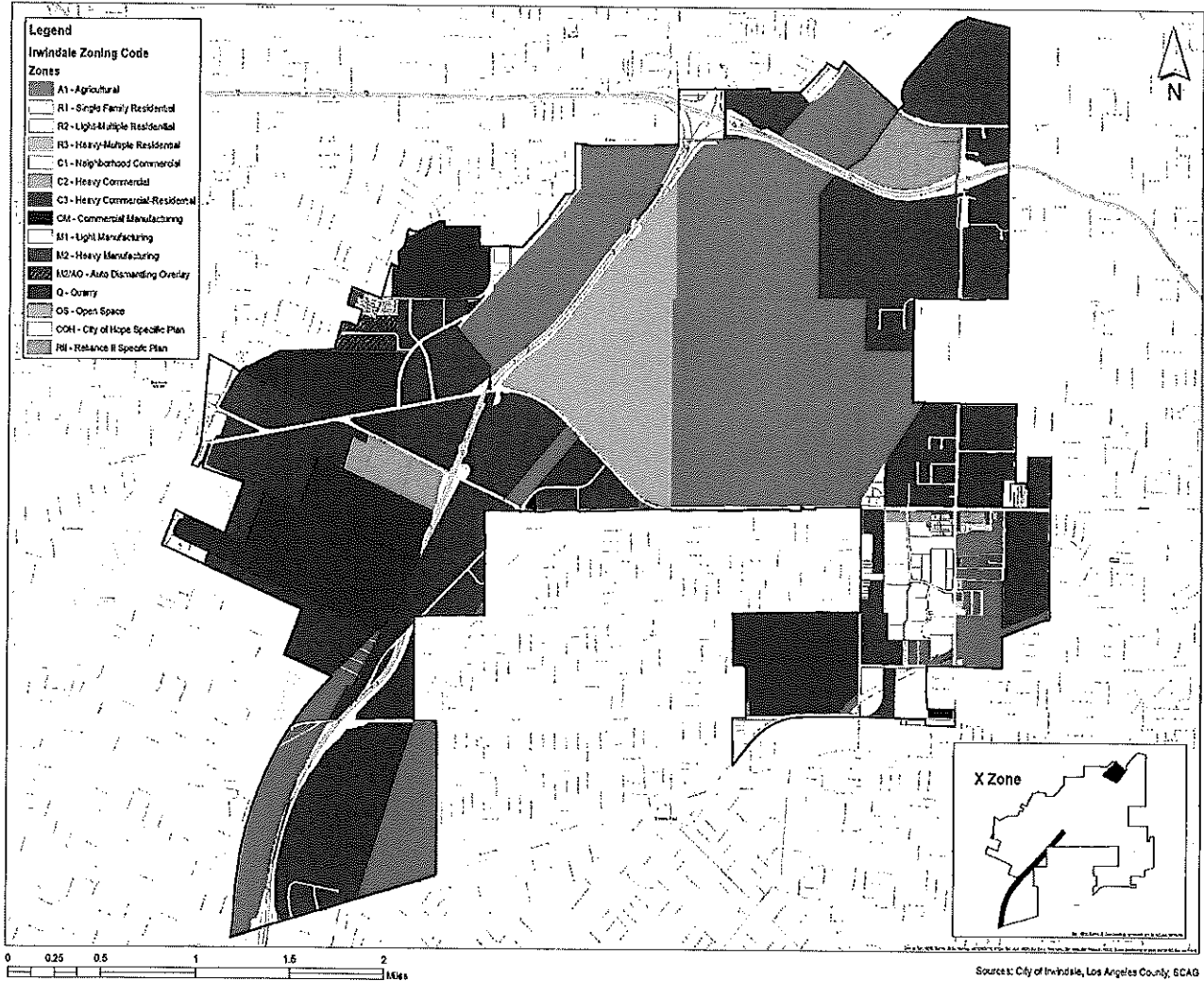
Attachment A – Irwindale Zoning Map

Attachment B – CalEnviroScreen 3.0 Map of the San Gabriel Valley Region

CC: Marisa Creter, Executive Director, SGVCOG, mcreter@sgvcog.org

Attachment A: Irwindale Zoning Map

CITY OF IRWINDALE - ZONING MAP (2018)



Attachment B: CalEnviroScreen 3.0 Map of the San Gabriel Valley Region

