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September 12, 2019

Kome Ajise
Executive Director
Southern California Association of Governments
900 Wilshire Blvd., Ste. 1700
Los Angeles, CA 90017
SENT VIA EMAIL: housing@scag.ca.gov

SUBJECT: PROPOSED REGIONAL HOUSING NEEDS ASSESSMENT (RHNA) ALLOCATION
METHODOLOGY

Dear Mr. Ajise:

The City of San Dimas has reviewed the proposed Regional Housing Needs Assessment (RHNA) Allocation Methodology and its Data Appendix. We appreciate the amount of work that your staff has taken to produce the reports and coordinate with the local agencies during this process.

We hope to work with SCAG to develop an allocation methodology that is equitable, addresses the requirements of RHNA, and results in our city being able to have our housing element certified by the Department of Housing and Community Development (HCD). Our concern is having a methodology that doesn't respect local input, fails to understand the constraints imposed on local jurisdictions for siting new housing, or results in a RHNA allocation that is unattainable for our city.

We therefore respectfully submit our comments, with the intent to surface issues and unintended consequences from our perspective, that SCAG may not be aware of, with the methodologies as currently proposed.

- 1. San Dimas strongly believes local input should underpin the selected RHNA Methodology allocation option and be used as the base for any RHNA allocation of projected need.**

We feel that local input has been an important part of the SCAG's RHNA planning process. It allows us, as the city, to provide a real perspective of local housing opportunities and constraints at the city level. Each city is different and a one-size-fits-all RHNA allocation factor does not allow each city to identify areas that are difficult to develop and/or not compatible for residential uses. Local input provides the backbone, linking the RHNA to the RTP/SCS by supporting the Sustainable

Communities Strategy in 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.

We support the bottoms-up approach SCAG used to derive local input over a 1 ½ year long process in which SCAG solicited input from all 197 local 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. By utilizing local input, the Connect SoCal, integrates transportation and land use planning.

Each jurisdiction submitted projected housing development numbers to SCAG as part of the Connect SoCal process, which is linked with the RHNA process. The selected RHNA methodology therefore should ensure that any number assigned to a city captures, at minimum, the number of units a jurisdiction identified through the local input process. The methodology should respect each jurisdiction input to ensure that other jurisdictions are not overburdened.

2. We believe that SCAG should allow time for review of any new factors or new methodology developed out of this process.

SCAG has made it clear that out of this comment period, they may create a new methodology out of a combination of the three they have right now including any comments received. For any new factors or methodologies that are introduced as potential inputs or approaches for distributing the regional determination, we respectfully request adequate time of no less than two weeks, be allocated to assess these new inputs and methods prior to any SCAG committee selecting a preferred methodology. This will allow us to review and provide input to SCAG that can help ascertain optimal outcomes and avoid technical flaws.

3. Share of Regional HQTAs (High Quality Transit Areas) Population

The City supports improving the linkage between new, higher density housing and frequent reliable transit service, and affirm this could also help the region in meeting mobility and air quality goals. However, please understand 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, HQTAs are not evenly distributed across the region. You also need to take into consideration jurisdictions that do not have HQTAs and how this will impact the allocations.

Given the significant repercussions for cities to 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 able to achieve and build the allocated housing units should be heavily weighted in one or more of the alternatives and hopefully in the selected methodology.

4. San Dimas opposes the reallocation of the “Above Moderate” category housing.

(Page 8, Option 1 Step 1d: Social Equity Adjustment for Existing Need)

The City of San Dimas opposes the elimination of and redistribution of the Above Moderate category described in Option 1. Above Moderate units are the only housing type as a whole category that can be built without some form of subsidy, tax break or incentive provided to the builder. Without redevelopment funding and other financial tools in place, providing the needed subsidies has become more challenging for cities. We all face the challenge to build more housing at every socio-economic level to meet the needs of our communities, especially a built-out community such as San Dimas. This type of situation will further reduce our available resources to provide funding for very low and low-income housing.

By reassigning the Above Moderate units to the three lower-income categories, as proposed in Option 1, it will further burden the city, by requiring us to have a higher share of lower-income units.

5. Utilize share of growth for household population not total population

(Page 16, Option 3): Share of population

Option 3 describes the use of the share of total population growth to allocate housing need. By definition, households are those housing units that are occupied by people and that population is called “household population”. Group quarters population, by definition, are those people not living in households, i.e. those sheltered in facilities and structures that are not defined as housing units. Since the RHNA calculations are based off household population, if Option 3, or any other methodology that is selected or created utilizes the share of population growth, this should be changed to the share of household population growth. Another suggestion is to use the share of household growth instead of the share of total or household population growth.

6. Remove land areas not compatible with residential uses from density calculation

(Page 54 of Technical Appendix Table: Share of 2019 population in 2016 HQTAs)

The calculation table shows ‘Density (population per acre)’ which is defined as “Acre size and density calculation is for total area within jurisdictional boundaries”. Though density is not currently used as an input into any of the current methodologies, we do not support the use of density as an input. We believe that some land uses should be removed from the total area within the jurisdiction so the density calculation properly reflects population density in developable/usable areas. For example, areas and land uses that are permanently protected open space, such as Angeles National Forest; flood channels; local parks and HOA open space; and other land unsuitable or unavailable for residential uses, should not be included in the area denominator.

The methodology should be adjusted to recognize existing open space deficits, high levels of existing density, incompatible industrial uses, and environmental contamination as constraints to further growth.

The City of San Dimas is leaning toward Option 3's methodology, with a few adjustments, we feel it will provide the most achievable outcome for our city. Once again, thank you to SCAG's staff for their partnership in developing an equitable RHNA methodology for our region that will lead to all of us having a certified housing element and more housing options. We look forward to working together through the remainder of the 2020 RHNA cycle.

Sincerely,

A handwritten signature in black ink, appearing to read "Ken Duran", written over a horizontal line.

Ken Duran
City Manager
City of San Dimas