



CITY OF BURBANK  
COMMUNITY DEVELOPMENT DEPARTMENT

150 North Third Street, P.O. Box 6459, Burbank, California 91510-6459  
www.burbankca.gov

September 13, 2019

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

Dear Mr. Ajise,

Please accept this comment letter on behalf of the City of Burbank for the 6<sup>th</sup> Cycle Regional Housing Needs Assessment (RHNA) – Draft Housing Needs Allocation Options. First and foremost, thank you for the opportunity to comment on the options. We understand that extensive research and analysis was completed to provide these options for determining the best way to allocate RHNA to local jurisdictions.

The City of Burbank offers the following comments:

- 1) Local input is a critical and necessary component to determining RHNA allocation as each jurisdiction is best equipped to provide data on efforts to date on the development of affordable housing in their respective community.
- 2) Options 1 and 3 take into account local input, however, there are two areas that may be considered:
  - a. *Information on housing units in the development pipeline*: current calculations only take into account new permits from 2006 – 2018, despite the start of the 6<sup>th</sup> RHNA cycle in 2021.
    - ✓ Under Option 1, this could result in the data for “Existing need due to recent building” becoming an inaccurate reflection (i.e. an undercount) of the building permit activity through the duration of the 5<sup>th</sup> cycle, for which there are still 3 more reporting periods for the Annual Progress Report (APR) to HCD. To illustrate this point, this year the City submitted an APR to HCD that reflected updated reporting requirements per AB 879. As required, the 2018 annual report included a tally of units for all housing permits currently in process with the City, in addition to the units reported as building permits issued for RHNA purposes. The APR identified 2,125 total proposed units in all applications received and in process as of April 1, 2019. Under the Option 1 methodology, which ceases the permit count at 2018, it seems that these additional impending housing units will not be credited towards anything with respect to assigning the next allocation despite the fact that by the time the 6<sup>th</sup> cycle commences in 2021, these units will be part of addressing the City’s existing need.
    - ✓ Additionally, the City requests clarification as to why SCAG is using permit data from a third party building/construction industry rather than permit data reported



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directly by cities to HCD (for cities that have submitted this information) as part of the annual reporting requirements to the State; and

- b. *Information on jurisdiction workforce*: This figure may indicate different income categories needed in each jurisdiction to be combined with the needs of the region. As part of a region wide effort to reduce VMTs, we want to ensure that there are sufficient opportunities – as reflected in the RHNA allocation - to provide moderate and above moderate-income housing to reflect a significant portion of our workforce and employment across income levels.

The City is keenly aware of the need to address the ongoing statewide housing production and affordability crisis imminently, and the need for all jurisdictions in the region to do their part. This is why the City Council recently approved a housing production goal of 12,000 units over the next 15 years. Again, we appreciate SCAG's efforts in developing a thorough, fair, and compliant methodology and look forward to ongoing discussions.

Sincerely,

A handwritten signature in blue ink that reads "Patrick Prescott".

Patrick Prescott

Community Development Director