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City Manager

CITY of CHINO

September 13, 2019

Mr. Kome Ajise, Executive Director
Southern California Association of Governments
Attention: RHNA
900 Wilshire Boulevard, Suite 1700
Los Angeles, CA 90017

RE: Proposed Regional Housing Needs Assessment (RHNA) Allocation Methodology

Dear Mr. Ajise:

The City of Chino appreciates the opportunity to provide written comments to the Southern California Association of Governments (SCAG) regarding the proposed Regional Housing Needs Assessment (RHNA) allocation methodology. While the City of Chino is committed to implementation of a local plan to accommodate housing needs for residents at all income levels, the Department of Housing and Community Development's (HCD's) calculation of the future need for affordable housing based on the three methodology options presented does not seem to be realistic.

HCD's allocation of over 1,344,000 housing units to the SCAG region for the 6th cycle, of which 5,045 to 13,104 could be allocated to Chino (depending on which methodology option SCAG selects), requiring 3,260 to 8,469 affordable housing units to be delivered, is neither reasonable nor attainable. During the current eight-year RHNA 5th cycle, Chino experienced significant growth and facilitated the construction of over 2,940 homes, of which 340 are affordable. HCD's proposed allocation would require Chino to build 1.1 to 2.88 times as many affordable homes in the 6th cycle as the total number of homes constructed in all income categories to date in the City within the current cycle. The City believes HCD's affordable housing numbers are unrealistic given the region's capacity and previous history of development. SCAG should continue to work with HCD to develop a reasonable, realistic allocation target.

While the City of Chino does not believe the proposed RHNA allocation for the SCAG region is obtainable and is advocating that SCAG negotiate with HCD to reduce the allocation to a more achievable number, we understand the need for input on the allocation methodology. Option 2 would appear to be the most preferred for the City, as units are simply assigned based on the City's population share and consideration of High-Quality Transit Areas (HQTAs). The two other options introduce factors that do not relate to the City, based on the City's size and location in the region. It should be noted that it is also important to factor in job centers in relation to housing when working with HCD to develop the final RHNA allocations numbers. Without this important analysis, it will contradict the State's goal of reducing Vehicle Miles Traveled and greenhouse gas emissions.

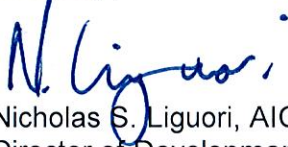
The City of Chino appreciates your considerations of the comments provided. It should be noted, the City shares SCAG's goal to develop and adopt a RHNA methodology that represents the best



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regional planning that is developed collaboratively with local jurisdictions and stakeholders in a manner that is credible and achievable, and can be realistically implemented.

Sincerely,

A handwritten signature in blue ink, appearing to read "N. Liguori". The signature is fluid and cursive, with a prominent initial "N" and a long, sweeping underline.

Nicholas S. Liguori, AICP
Director of Development Services

cc. Development Services Department File