



## Land Use Services Department Planning

Terri Rahhal  
Director

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

SENT VIA EMAIL: [housing@scag.ca.gov](mailto:housing@scag.ca.gov)

### **SUBJECT: PROPOSED 6<sup>TH</sup> CYCLE REGIONAL HOUSING NEEDS ASSESSMENT (RHNA) ALLOCATION METHODOLOGY**

Dear Chair Huang and Members of the RHNA Subcommittee:

Thank you for the opportunity to submit comments on behalf of the County of San Bernardino, Land Use Services Department. Our department serves the unincorporated areas of San Bernardino County with the principal responsibility of planning for those areas. The County of San Bernardino has significant concerns with the Regional Housing Need Assessment (RHNA) determination of 1,344,740 total units for the Southern California Association of Governments (SCAG) region, as provided by the Department of Housing and Community Development (HCD). Additionally, the County of San Bernardino has concerns with the methodology used for determining the distribution among SCAG jurisdictions, especially the unincorporated area. None of the three methodology options presented would be feasible for the County to produce during the RHNA planning period. Therefore, we ask that the RHNA Subcommittee consider the following concerns as part of the RHNA allocation process.

#### History

During the 4<sup>th</sup> Cycle RHNA allocation process, the County of San Bernardino was originally allocated over 48,000 units, which was later scaled back to 20,623. In the following cycle (5<sup>th</sup> Cycle) the County was allocated 39 units. This occurred after a realization that the County did not have capacity to accommodate such a high number of units. Once the State and SCAG understood the major constraints the County was facing, it was clear that rapid growth in the unincorporated areas of San Bernardino County was both infeasible and inappropriate.

#### Infrastructure

A majority of the unincorporated areas of the County lack the basic infrastructure needed for development. Providing infrastructure in these remote areas is cost prohibitive. Most residential areas of the unincorporated County are on septic (not sewer) and therefore cannot support density above two units per acre. It is not just the rural desert communities that have a lack of infrastructure; even unincorporated areas of the Valley Region, such as the communities of Bloomington and Muscoy, are largely on septic. Surrounding incorporated jurisdictions have limited wastewater treatment capacity to serve growth within their incorporated boundaries. Even in the unincorporated community of Bloomington, which is adjacent to sewer areas, adding pipe and expanding capacity would cost between \$10 and \$40 million --- a cost that new development would be unable to financially support until 2030 at the earliest (given growth projections and wastewater treatment capacity plans of

#### BOARD OF SUPERVISORS

ROBERT A. LOVINGOOD  
First District

JANICE RUTHERFORD  
Second District

DAWN ROWE  
Third District

CURT HAGMAN  
Chairman, Fourth District

JOSIE GONZALES  
Vice Chair, Fifth District

Gary McBride  
Chief Executive Officer

adjacent jurisdictions). The only other area potentially suitable for intensive housing growth falls within the Town of Apple Valley's northwestern sphere of influence. This area is slated for growth ONLY once annexed by the Town of Apply Valley, consistent with the Town's General Plan. No such growth is supportable as an unincorporated island. The County's vast road network contains many dirt roads without current funding or plans to be paved. The responsibility to make the necessary infrastructure improvements required for residential development would be on the developer and passed through to homebuyers and occupants, making the cost of development higher and the ability to create affordable units prohibitive.

#### Fiscal Sustainability

The County is responsible for providing regional services to the entire county and municipal services to the unincorporated areas. Of the County's \$5 billion budget, 94% goes to regional services. While the County receives a portion of property taxes on all property in the county, the County receives little in sales taxes and other revenue compared to incorporated jurisdictions. A recent County fiscal study determined that the County loses money for any new residential unit built that sells for less than \$400,000. In contrast, the County breaks even or makes money for any new housing built inside incorporated boundaries. When new housing is built in the County, it likely comes at the expense of providing better municipal services to unincorporated areas or regional services to the entire county. The cost of providing municipal services to unincorporated areas is not fiscally sustainable. The County is in the process of updating its policies and tools to support fiscally sustainable growth.

#### Water Availability, Public Health, and Safety

There are limited water resources for most of the unincorporated communities, even those near urbanized cities. In parts of the desert, water is derived from private wells which are expensive to drill and need periodic testing for contaminants to ensure safe drinking water. Unsafe drinking water can cause serious health issues and unfortunately, disproportionately affects low income and disadvantaged communities. Many of the surrounding incorporated jurisdictions only have sufficient wastewater treatment capacity to serve growth within their incorporated boundaries, making it difficult to grow in unincorporated areas beyond what is supportable by private wells or very incremental connections to piped systems. As an organization that is responsible for the health and safety of its residents, to allow this type of issue perpetuate would be unacceptable and to encourage affordable housing in such areas irresponsible.

The entire Mountain Region of the County should be considered unsuitable for substantial growth due to the extreme fire hazards present on a constant annual basis. As well as being in a very high fire hazard severity zone, there are limited ways in and out of many of the Mountain communities. To prepare and mitigate some of these risks, the County is working with SBCTA to address climate adaptation issues through Resilient IE, a collaborative effort to prepare and mitigate risks associated with climate adaptation and transportation infrastructure. One of the key elements of the study completed for Resilient IE is to limit the development in high fire areas including minimizing development in the wildland-urban interface zones. The proposed RHNA numbers would certainly push development into these spaces increasing risk of wildfire impacts. Many Desert Region communities are also in remote areas and have dirt roads making emergency response difficult. With public safety as a top priority, we believe these factors need to be a consideration in the allocation methodology.

#### Jurisdictional Control and Land Availability

While large geographically, nearly 90% of the County is out of our jurisdictional control. The unincorporated County has five military installations, two national parks, and millions of acres of BLM and other federal and state land. Additionally, much of the unincorporated area is constrained by the

presence of state and/or federally protected habitat areas, further reducing the County's available land resources. Moreover, there are thousands of acres of land in the unincorporated area that are protected by conservancies, other land trust organizations and areas which are in land conservation contracts or open space contracts (Williamson Act). There are additional constraints such as mining activity, geologic hazards, and military influence areas that would affect the type of development possible. So while large in area, it should be understood that the vast majority of the unincorporated County is not suitable for development.

#### Local Planning Factors

As stated in the SCAG materials, "As part of the development of the proposed RHNA allocation methodology, SCAG must consider a survey of planning factors that identify local conditions and explain how each of the listed factors are incorporated into the proposed methodology". The County agrees that this is an important consideration that needs to be included in the methodology. Local input provides a frame of reference for considering the limitations and opportunities individual jurisdictions have. The methodology must consider the unique conditions and circumstances of unincorporated areas.

The Inland Empire region already has its disadvantages with fewer jobs and a higher proportion of middle and lower income residents who travel long distances for work. Even within the inland region, unincorporated San Bernardino County is different than a city. The unincorporated areas are distributed over vast and varied landscapes with no city core or town centers, and lack basic infrastructure needed for high or even medium density development. Overall, the County is housing rich and jobs poor; the unincorporated county even more so. The County does not compete with the other jurisdictions (cities) for jobs and does not wish to compete with cities for housing (with developers pitting the development standards of cities and County against one another). Furthermore, the County is responsible for providing regional services to city and county residents alike --- adding more housing to unincorporated areas only reduces the amount of funding and resources the County has to provide regional services. The methodology needs to understand and incorporate these considerations and constraints to improve conditions in the county and region.

#### State and Regional Objectives

Consideration of the following state and regional objectives would support very limited growth for the County's unincorporated areas. The County believes that the RHNA allocation methodology should be consistent with these objectives.

- RTP/SCS: The allocation methodology should be consistent with Connect SoCal, the Regional Transportation Plan and Sustainable Communities Strategies (RTP/SCS) by placing development in urban areas in close proximity to transportation corridors and public transportation. It is important to remember that a key component of sustainable communities strategies is to focus housing and job growth within existing urbanized areas giving people greater accessibility to job opportunities. To allocate such a high number to San Bernardino County, especially the unincorporated areas, would be contradictory to this objective.
- VMT: Reducing vehicle miles traveled (VMT) has become a major focus to help attain the State's greenhouse gas (GHG) emission reduction goals. Placing new housing in rural areas of the County, without available transit services or transportation infrastructure will increase VMT and non-attainment of GHG goals.
- TOD: Focusing on more transit oriented development (TOD) is another regional objective. The County unincorporated area lacks any opportunity to achieve TOD, which should be located in more urban and sub-urban areas within municipalities.
- HQTAs: Development should be placed near high quality transit areas (HQTAs). The County unincorporated area contains only fractional areas of two HQTAs which are more reliant on

September 13, 2019

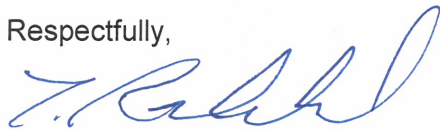
Page 4 of 4

adjacent cities to intensify for adequate transit service and support for higher density development.

- Jobs/Housing Balance: Adding housing near jobs overlaps with a number of other state and regional objectives listed above. Reduced VMT, reduced impact to roads, fewer air emissions, lower cost to commuters, and higher quality of life are some of the benefits of having a balance between jobs and housing. For these reasons, we believe jobs/employment should be included in the RHNA methodology.

Thank you again for the opportunity to comment. We appreciate the hard work and dedication of the RHNA Subcommittee and SCAG staff, and we look forward to a more in depth discussion as part of this process.

Respectfully,



Terri Rahhal, Director

cc: Hon. Bill Jahn, RHNA Subcommittee President  
Hon. Jim Mulvihill, RHNA Subcommittee, San Bernardino County alternate  
San Bernardino County Board of Supervisors  
Gary McBride, CEO  
Leonard Hernandez, COO