



September 13, 2019

The Honorable Peggy Huang, Chair
Southern California Association of Governments
Regional Housing Needs Assessment Subcommittee
900 Wilshire Boulevard, Suite 1700
Los Angeles, CA 90017
Via Email: housing@scag.ca.gov

RE: Comments on Regional Housing Needs Assessment (RHNA) Allocation Methodology Options

Dear Ms. Huang:

The City of Indio respectfully submits this letter to provide formal written comments to the Southern California Association of Governments (SCAG) regarding the proposed Regional Housing Needs Assessment (RHNA) Allocation Methodology Options (“Methodology Options” or “Options”) being proposed by SCAG for the sixth Housing Element Cycle. While the City of Indio understands and appreciates the need for continued progress for the RHNA, we believe that the time allotted for cities to review and consider the options, consult with city management and elected officials and engage with interested community members is insufficient. As such, the City of Indio may elect to provide additional comments on the allocation methodology options as part of SCAG’s continued future review and consideration efforts.

The City has been committed to doing its part in addressing regional housing needs by supporting, facilitating and advocating for the production of housing within the City. The City has supported the production of new affordable housing units and rehabilitation of existing multi-family housing projects as funded with State and/or Federal Affordable Housing Tax Credits, Bond Financing and other public/private sources. However, despite the City’s best effort to encourage and support residential development, the City similar to other communities in the region and throughout the State has been unable to counter the market conditions and economic factors that have affected development in our city and region. A dwindling construction work force, increased labor and material costs, and other economic factors, which are out of the City’s direct control or influence, have made development difficult in the Coachella Valley. Yet, despite these well-known challenges, the City has met over fifty-one (51) percent of the City’s current Fifth Cycle RHNA (2013-2021) housing production goals. During the next two years, the City anticipates the production of an additional 400 to 600 housing units that will allow the City to reach a projected seventy (70) percent compliance with the current Fifth Housing Element RHNA goals.

In addition to supporting and expanding the supply of housing within the city, the City has employed good faith efforts in complying with Housing Element Law on a voluntary basis. The City currently possesses

a State-Certified Housing Element and has done so over the last two RHNA Planning Cycles and is compliant with reporting requirements as evidenced by the timely yearly submission of the City's Housing Element Annual Progress Reports.

In addition, the City is taking proactive steps to address its regional obligation to provide housing in a responsible and accountable manner. The City is currently completing the update of its General Plan. This Plan when adopted later this year will increase land use density and intensity throughout the City. The City is also in the process of updating its Downtown Specific Plan. The updated Plan will propose significant density increases in Downtown Indio that will result in urban multi-family development in close proximity to diverse multi-modal movement opportunities. During 2020, the City will be updating its zoning regulations to implement the adopted General Plan. As part of this effort, the City will also be reviewing all adopted specific plans and adopted master plans to identify opportunities to revisit and revise approved housing production goals for these areas of the City that could result in additional housing development.

The Allocation Methodologies Options propose a range of new housing comprised of 8,564 units for Option 1, 5,021 units for Option 2 and 16,074 units for Option 3. Based on consistent trends of 200 to 300 issued building permits per year, the partial seasonal population base of the City and distinctive geographic economic market forces for job creation, the City will be challenged in achieving the identified units for Option 1 and will not, in any conceivable manner, be able to achieve the housing units proposed for Option 3 – please note that the 16,074 units specified in this option would be a fifty percent (50%) increase over the current 32,000 total housing units in the City. To be able to achieve the Option 3 housing units goal, the City would have to substantively rezone the majority of existing non-residential properties to residential land uses that would significantly diminish the City's ability to offer employment, retail and services to current and future Indio residents. Further, this level of housing in the City would require significantly higher levels of investment in current and new above ground and below ground infrastructure than the City could financially afford or could practically build or re-build. As such, while the City has concerns with the Option 2 allocation methodology, it is more reasonable and attainable than the other two options and as such, the City believes that at this time, it is the more appropriate allocation methodology for Indio.

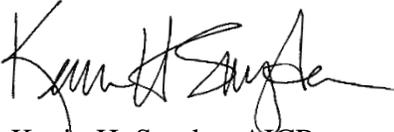
While the City believe the allocation methodologies each have their own limitations and do not adequately reflect local conditions and local control, the City of Indio is committed to proactively participating in the RHNA process to help address the regional housing needs and issues. In that vein, the City believes that SCAG must apply reasonable and appropriate methodology considerations that will facilitate the City of Indio and all jurisdictions in meeting regional housing needs while not overly burdening certain cities such as Indio with unrealistic housing unit expectations that cannot and will not be met.

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Page 3 of 3

The City of Indio appreciates the opportunity to provide input into the RHNA and Allocation Methodology process and looks forward to continuing to work together in a collaborative environment that ensures that any allocation is fair, equitable, and achievable.

Please feel free to contact me at (760) 541-4255 or by e-mail at ksnyder@indio.org.

Sincerely,

A handwritten signature in black ink, appearing to read "Kevin H. Snyder". The signature is fluid and cursive, with the first name "Kevin" and last name "Snyder" clearly distinguishable.

Kevin H. Snyder, AICP
Director of Community Development

cc: Mark Scott, City Manager
Jesus Gomez, Housing & Neighborhood Services Manager
Leila Namvar, Senior Planner