



## PLANNING DIVISION

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September 13, 2019

Honorable Peggy Huang, Chair  
RHNA Subcommittee  
Southern California Association of Governments  
900 Wilshire Blvd, Ste 1700  
Los Angeles, CA 90017

Honorable Chair and Members of the Regional Housing Needs Assessment Subcommittee:

The following serves as a response to the SCAG's proposed RHNA Methodology. We appreciate the opportunity to provide comment on the methodology prior to its approval. Furthermore, we would like to thank SCAG's staff for presenting the methodology to the San Gabriel Valley Council of Government's Planner's Technical Advisory Committee.

Temple City has the following comments to offer on the proposed methodology:

- The City supports the distribution of existing and projected housing need based on the population within a High Quality Transit Area as found in Options 1 and 2. Doing so takes into consideration an important planning principle of placing growth around transit, which reduces vehicle miles traveled per capita and greenhouse gas emissions per capita. SCAG has recommended a 20 percent distribution based on housing need; Temple City would support an even large percentage. Placing thousands of housing units in areas without high quality transit is not "smart growth." Additionally, the City recommends looking at the location of existing and future jobs to assist in deciding the location for future growth. Placing thousands of housing units in areas where there are very few jobs means every new resident will have to travel long distances to work, thereby increasing congestion, air quality impacts, greenhouse gas emissions and vehicle miles traveled.
- The City recommends modifying Option 2 to allow for local input. Every jurisdiction has limitations and constraints that should be taken into consideration in the process.
- The City recommends modifying the proposed methodologies to take into historic growth rates and existing population.
- The City also encourages SCAG to consider that constructing housing in built out cities, such as Temple City is extremely difficult. Temple City has done its part in zoning and planning for future growth with its newly adopted General Plan, Specific Plan, and its corresponding Zoning Code Update. However, in many cases property owners are paying

very low property taxes, are not willing to sell, and therefore potential new development allowed under these plans cannot occur. Furthermore, built out cities often have historic resources and mature trees that must be preserved, by law.

- The housing allocations for Temple City are unprecedented. Planning for the construction of these units over a longer time frame may be possible, but the amount of growth over such a short time frame in a fully developed city is inconceivable. Based on HCD's most recent allocation for SCAG, Temple City would receive a total regional housing allocation of 2,069 housing units. To put this in perspective, the California State Department of Finance estimates that Temple City has approximately 12,321 housing units. This would equate to planning for a 17 percent increase in growth in an 8-year period. To further put this in perspective, in a 30-year span, from 1990 to 2019, the City grew by approximately 745 housing units. The proposed methodologies would result in well over 30 years' worth of growth in an 8-year time frame. Additionally, the City's allocation of very low-income housing units in Option 1 – 770 – is 167 more units than the City's total housing unit allocation in the last cycle.
- Planning for the additional growth in housing will be a herculean task. The City recently underwent a three year, one-million-dollar comprehensive general plan and zoning code update. Seeking to act in a responsible manner the City reviewed historic growth patterns, existing SCAG projections, and RHNA allocations. The City approved a General Plan with more capacity than would be required by the most recent RHNA figures. However, it was expected that these units would be constructed not over an 8-year cycle, but over multiple RHNA cycles. This would be a reasonable pace of growth. It should be noted that many of the sites in the General Plan's modelling would not meet the requirements of AB 1397. Furthermore, the City seems to be penalized for planning for growth. Without updating the General Plan, the City would have a lower capacity and therefore the inputs and results in Options 1 and 3 would be much lower. In a built-out city with infrastructure constructed more than 70 years ago, it is important to phase in growth over a longer time frame to allow the expansion of very costly infrastructure. Pressing 30 years' worth of growth into such a short span will place a heavy burden on the City's infrastructure.
- Temple City's concerns are heightened in light of recent and proposed legislation (for example SB 35, SB 166, AB 1397, AB 1568 and SB 592). In the previous RHNA cycles, the City needed only to demonstrate the potential for the construction of dwelling units. However, recent and proposed legislation suggest that local jurisdictions may soon be required to actually construct the number units within the RHNA allocation or face penalties.

The City appreciates the difficult position that SCAG is in and is grateful for the time and attention that is being demonstrated in balancing the State's goals and the realities at the local jurisdiction

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level. Should you have any questions regarding this matter, please do not hesitate to contact me at (626) 285-2171, or [sreimers@templecity.us](mailto:sreimers@templecity.us).

Sincerely,



Scott Reimers

Planning Manager