



COUNTY OF RIVERSIDE
Transportation and Land Management Agency
Juan C. Perez
Assistant CEO/TLMA Director



Transportation Department

Planning Department

Building and Safety Department

Code Enforcement Department

October 16, 2019

The Honorable Peggy Huang, Chair
Community Economic &
Human Development Committee (CEHD)
Southern California Association of Governments
900 Wilshire Blvd, Ste. 1700
Los Angeles, CA 90017

RE: 6th Cycle of the Regional Housing Needs Assessment (RHNA) Allocation.

Dear Ms. Huang,

The comments letter are provided on behalf of Riverside County's Transportation and Land Management Agency (TLMA) regarding the RHNA allocation process and allocation option to be presented for consideration to the Community Economic & Human Development (CEHD) Committee.

TLMA has reviewed the Modified Option 1 presented by SCAG staff on October 7th of the RHNA subcommittee. Our concerns with this option mirror those concerns we identified for original Options 1 and 3, as stated in TLMA's letter of August 27, 2019 to SCAG President Bill Jahn. This letter points out major concerns that Riverside County Staff has with the methodology that SCAG has used to arrive at an inequitable RHNA allocation in the 5th cycle, which we request be addressed individually for Riverside County as part of the 6th cycle process.

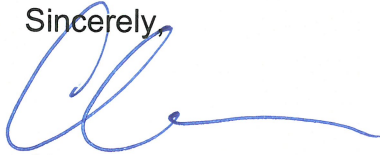
We are providing additional comments below on Modified Option 1 which should be presented to the aforementioned SCAG recommending and decision-making bodies.

- The focus on the RHNA allocation should be on the 6th Cycle timeframe of 2021-2029 and the housing needs for that period. No consideration should be given to 2045 projections that are so far out into the future, as demographics can change significantly between the end of the decade and 2045, and the County's General Plan buildout projection, as well as that of our neighboring jurisdictions, does not extend out to 2045. Before 2045 projections are used, they should be vetted with local jurisdictions and reconciled with their projections.

- The existing need, if calculated separate than the projected need, should be calculated using existing conditions because projected growth and planned facilities have little to no bearing on current housing need. Therefore, similar to the original Option 1, share of “existing” population and share of “existing” population within HQTAs should be used, with the addition of an “existing” job accessibility component. (Proposed existing need: existing pop. [50%] + existing pop./HQTAs [25%] + existing job accessibility [25%]).
- SCAG is to be commended for addressing access to jobs and transit in response to the comments received in formulating Modified Option 1. However, such consideration should extend beyond “existing need” and also include “projected need”. In order to create a balance of land uses, access to jobs and transit is a critical consideration for the present, and will continue to be in the future. (Proposed projected need: projected HH growth for 2029 [50%] + pop. w/in planned HQTAs up to 2029 [25%] + future job accessibility areas up to 2029 [25%]).
- A further reason for addressing access to jobs and transit for the 6th Cycle is because Riverside County is in the midst of updating its Climate Action Plan. The County will be challenged to meet 2030 and 2045 greenhouse gas reduction targets even without having to absorb additional vehicles miles travelled to accommodate housing, which for the foreseeable future will likely be further from existing and planned job centers because of the sheer size of the numbers expected from the RHNA allocation.
- As stated in TLMA’s August 29th letter, we continue to support original Option 2 as the most equitable means to fairly provide housing allocation. In addition to considering transit access, it does not create, what appears to be, an artificial distinction between existing and projected need – a need is a need. It also does not include variables such as permit activity, vacancy rates and replacement need which can be addressed differently by the jurisdictions, making these variables potentially inconsistent between the jurisdictions. Modified Option 1 does not address this inconsistency issue, except for the removal of the permit activity variable.
- Because of state law changes, the preparation of annual progress reports which monitor a jurisdiction’s efforts toward meeting housing targets have become increasingly complex and labor intensive regarding data collection. Modified Option 1 will continue this trend and make it extremely difficult to maintain priorities, including the preparation of annual progress reports in the face of budget limitations and competing priorities. Therefore, a more standardized Modified Option 1 should be considered, if not a re-opener of original Option 2.

Thank you for the opportunity to provide these comments. We remain willing to engage with SCAG staff more closely, as we have offered in the past, to discuss our concerns in more detail.

Sincerely,



Charissa Leach
Assistant Director Transportation and Land Management Agency

Cc: Riverside County Board of Supervisors
Hon. Bill Jahn, SCAG President
Hon. Rusty Bailey, Riverside, RHNA Subcommittee Representative
Hon. Russell Betts, Desert Hot Springs, RHNA Subcommittee Alternate
Mr. Kome Ajise, SCAG Executive Director
Ms. Ma'Ayn Johnson, SCAG Housing and Land Use Planner
George Johnson, CEO
Lisa Brandl, COO