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CITY of CHINO

November 6, 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) Regional Council 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 draft methodology recommended by the SCAG RHNA Subcommittee and the Community, Economic, and Human Development (CEHD) Committee as presented does not seem to be realistic.

HCD's allocation of over 1,341,000 housing units to the SCAG region for the 6th cycle, of which 8,361 are allocated to Chino, based on the latest methodology, requiring that 4,105 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 1.40 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 and SCAG's current proposed affordable housing allocation for the City of Chino 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, with no other option choices available, the previously proposed Option 2 would appear to be the most preferred as units are simply assigned based on the City's population share and consideration of High Quality Transit Areas (HQTAs). The current proposed methodology relies too heavily on the local input process associated with the SCAG's 2020 RTP/SCS, which distributes units to Chino based on projected growth using horizon year 2045 and not the shorter 2029 RHNA horizon year timing. It should be noted that it is also important to factor in job centers, infrastructure, and availability of transit 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 VMT/GHG reduction.

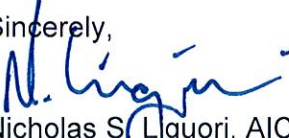


November 4, 2019

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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 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,



Nicholas S. Liguori, AICP

Director of Development Services

cc. Development Services Department File

Joann Lombardo-City of Chino Hills, Director of Community Development

Ray Marquez-City of Chino Hills, Council Member