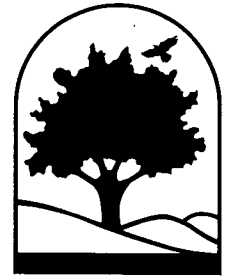


City of Chino Hills



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November 6, 2019

Honorable Bill Jahn, President
Southern California Association of Governments (SCAG)
Attn: SCAG Regional Council
900 Wilshire Blvd., Ste. 1700
Los Angeles, CA 90017

Subject: Opposition to 6th Cycle Proposed Regional Housing Needs Assessment (RHNA) Methodology

Dear Honorable President Jahn:

The City of Chino Hills appreciates this opportunity to provide comments on the currently proposed (fourth) draft RHNA methodology recommended by SCAG staff to the RHNA Subcommittee on October 7, 2019. This letter follows Chino Hills' previous comments submitted on September 6, 2019, which outlined concerns with SCAG's three previous draft methodologies.

Chino Hills is committed to being part of the statewide process to provide adequate and affordable housing. However, as currently proposed, the RHNA methodology does not place sufficient housing units near jobs and transit, and allocates too many units to places where they won't get built.

Mayor Rusty Bailey of the City of Riverside has suggested changes to the RHNA methodology. These changes are described in a November 1, 2019 letter from the Mayor to President Jahn, and propose adjustments to the methodology's existing need and residual unit allocations. Chino Hills supports these changes as they better account for High Quality Transit Areas (HQTAs) and job centers, and are consistent with state and regional goals to place housing by jobs and transit and achieve Greenhouse Gas (GHG) emission and Vehicle Miles Traveled (VMT) reductions.

However, these changes correct only some of the flaws in the fourth RHNA methodology. In addition to these changes, Chino Hills recommends the following changes to the projected needs calculation:

Forecasted Household Growth RHNA Period: SCAG staff is using an outdated baseline to develop forecasted household growth. The 2020 household numbers need to be recalculated based on current state Department of Finance (DOF) 2019 numbers. For Chino Hills, the SCAG methodology's 2020 household numbers are substantially lower than our current DOF count and even lower than SCAG's Local Profile Report 2018 numbers, resulting in an over count of projected need.

City Council: Art Bennett ▪ Brian Johsz ▪ Ray Marquez ▪ Cynthia Moran ▪ Peter J. Rogers

Adjusted Forecasted Household Growth 2020-2045: SCAG's currently proposed RHNA methodology applies projected local growth for 2045, which is 26 years in the future. The infrastructure needed to support 2045 population growth takes years to plan and build. Available land and market demand are other key ingredients to build housing. Trying to fit 26 years of housing needs into an eight-year RHNA cycle is certainly not a sound methodology for building more housing. It allocates too many units to places where they won't get built, and similarly, results in an over count of projected need. The methodology needs to be revised using 2030 growth projections which fits more closely to the 2012-2029 RHNA cycle.

Jurisdictions HQTAs Population 2045: SCAG's currently proposed RHNA methodology applies an adjustment for 2045 transit accessibility. Presumably, the transit projections align with the 2020 Connect SoCal regional plan which has yet to be distributed for public review. For Chino Hills, this transit adjustment results in 22.8% of Chino Hills population being assigned to HQTAs. Perhaps by 2045 there will be transit readily available to Chino Hills and other inland communities, but for now and for the 8-year RHNA cycle, transit is not available. Placing units where HQTAs are not even planned, further over counts projected need.

We look forward to working with SCAG to create a reasonable 6th Cycle methodology and development of ample and affordable housing for the region.

Sincerely:



Joann Lombardo
Community Development Director, City of Chino Hills

cc: Ray Marquez, Councilmember, City of Chino Hills
Ben Montgomery, City Manager, City of Chino Hills
Planning Commission, City of Chino Hills
Nicholas Ligouri, Director of Development Services, City of Chino Hills