

November 6, 2019

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

**RE: 6<sup>th</sup> Cycle of the Regional Housing Needs Assessment Allocation**

Dear Mr. Jahn,

The City of Menifee would like to thank you for the opportunity to provide comments on the Regional Housing Needs Assessment (RHNA) for the SCAG region. We would like to stress that the City of Menifee is an active partner in this process and is willing to take on its fair share of the region's housing needs; however, it is important for Menifee, as well as for all of the partnering jurisdictions, that the RHNA allocation methodology is equitable, achievable, and results in sustainable development.

The City of Menifee staff has reviewed the SCAG RHNA methodology (Option 4) and our concerns with this option are similar to those concerns expressed in our August 30, 2019 letter regarding Options 1 and 3. City staff participated via web in the October 7, 2019 RHNA Subcommittee Meeting, October 17, 2019 Technical Working Group and the October 21, 2019 CEDH Committee meeting. We would like to express the following concerns with the methodology and respectfully request presentation of these concerns to the SCAG Regional Council on November 7, 2019.

Forecasted Household Growth:

- The City of Menifee commends SCAG for incorporating local input as part of the RTP/SCS 2030-2045. As part of that process, future growth data on entitled projects was provided. It is extremely important to note that jurisdictions cannot change the affordability mix on projects that have vested entitlement rights. In addition, as a newly incorporated and fast growing City, Menifee should not be penalized when jurisdictions that are low-growth or no-growth benefit. We request an adjustment be considered for forecasted growth.
- Determining the need for the 2021-2029 Round 6 Cycle should not include forecasts that extend out to 2045. Projecting well beyond the 2029 Housing Element cycle places an unrealistic burden for the 6<sup>th</sup> Cycle allocation. There is no guarantee that the growth will occur and demographics may shift that make this unreasonable.
- The RHNA methodology needs to have greater emphasis on jobs and transit to address the existing jobs/housing imbalance and promote more housing near transit. The proposed RHNA allocation will continue to promote sprawl into areas that lack basic

infrastructure to support urban type high-density housing, which is inconsistent with goals of the State and SCAG's RTP/SCS.

For the reasons identified above, the City of Menifee requests that SCAG reconsider the previous Option 2 for reasons stated in our August 30, 2019 letter. The previous Option 2 is a more equitable approach to providing housing within the SCAG region as it appropriately considered proximity to transit, and does not place an unreasonable weight on forecasted household growth beyond the 2029 6<sup>th</sup> Cycle. The City of Menifee appreciates the opportunity to provide input into the RHNA process. Should you have any questions, please contact me at [ckitzerow@menifee.us](mailto:ckitzerow@menifee.us) or (951)-723-3706.

Sincerely,



Cheryl Kitzerow, AICP  
Community Development Director

Cc: Mr. Kome Ajise, SCAG Executive Director  
Ms. Ma'Ayn Johnson, SCAG Housing and Land Use Planner  
Armando Villa, City Manager