



December 12, 2019

Mr. Doug McCauley, Director
California Department of Housing and Community Development
2020 West El Camino Avenue
Sacramento, CA 95833

RE: REGIONAL HOUSING NEEDS ASSESSMENT (RHNA) ALLOCATION METHODOLOGY

Dear Mr. McCauley:

On behalf of the Tustin City Council, I would like to express our serious concerns regarding the action taken by the Southern California Association of Governments (SCAG) Regional Council on November 7, 2019, to approve, through a substitute motion and a 43-19 vote, an alternative Regional Housing Needs Assessment (RHNA) allocation methodology; and our objection to the disproportionate draft RHNA allocation for the City of Tustin.

This alternative RHNA allocation methodology will result in a dramatic increase in the RHNA allocation for most Orange County cities, while substantially decreasing the RHNA allocations for many Riverside and San Bernardino County cities. In fact, the allocation for the City of Tustin would be approximately 6,853 housing units over the eight-year 6th Cycle RHNA period.

As you are aware, the alternative RHNA allocation methodology had not been analyzed by SCAG staff prior to the November 7, 2019, vote and was not consistent with the RHNA allocation methodology that was supported by SCAG staff, provided to all SCAG member jurisdictions for review, and approved by the SCAG RHNA Subcommittee and the SCAG Community, Economic, and Human Development Committee.

The City of Tustin is committed to addressing California's critical housing needs and is a leader in building affordable housing and housing for those of all socioeconomic levels. A listing of the many existing affordable home communities and emergency and transitional housing facilities in Tustin is attached to this letter. With housing development within the City's former redevelopment areas and the major master-planned communities of Tustin Ranch and Tustin Legacy, approximately 9,000 single and multiple family homes have been built in Tustin over the past thirty (30) years. However, many other cities statewide have done little or nothing to address their own local affordable housing needs without significant consequences, while the City of Tustin is facing the possibility of an artificially large RHNA allocation primarily because of an alternative methodology that over-emphasizes proximity to transit facilities and employment centers.

The RHNA allocation methodology should be equitable and reflect local input that incorporates population, housing, and employment projections. This local input has always been a foundational component of SCAG's RHNA planning process and ensures consistency between the RHNA and the Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS).

It is also concerning how SCAG addresses the inconsistency between the regional RHNA determination and the SCAG regional growth forecast and local input, which were used as a basis for the 2020 RTP/SCS, known as Connect SoCal. The SCAG region potentially could be planning for additional housing without planning for the transportation network to support the additional housing. And if the RTP growth forecast is modified to reflect the regional RHNA

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determination by HCD that is inconsistent with local input, the RTP growth forecast would not be based on sound land use planning principles.

Although the City of Tustin believes that the regional allocation of approximately 1.3 million housing units for the SCAG region is unattainable, this total allocation determined by HCD should be more equitably allocated among jurisdictions if the goal is to encourage the development of more housing throughout the region.

Therefore, the City of Tustin respectfully requests that the California Department of Housing and Community Development reject the SCAG RHNA allocation methodology that was adopted by the SCAG Regional Council on November 7, 2019, and take all possible steps within its authority to ensure that the final RHNA methodology adopted by SCAG complies with State law, results in more reasonable RHNA allocations for Orange County cities, and is not based on political motives.

The City of Tustin continues to be a leader in the production of workforce and market-rate housing. However, with the dissolution of redevelopment agencies, the available funding for affordable housing subsidies has diminished and cities and counties are struggling to meet their RHNA targets. Hopefully, recently enacted funding measures will spur the development of more affordable housing throughout California and result in RHNA targets that are more attainable.

The City of Tustin had urged SCAG to adopt an RHNA Allocation methodology for the 6th Cycle RHNA that reflects local input, is reasonable and equitable, is consistent with SCAG's stated goals, and allows communities to have local control over housing development and have their housing elements certified by the Department of Housing and Community Development (HCD). Not doing so may result in an RHNA allocation that is not achievable and one that will jeopardize the region's ability to successfully address California's housing crisis.

Sincerely,



Dr. Allan Bernstein
Mayor

cc: Tustin City Council
Kome Ajise, SCAG
Jonathon T. Hughes, SCAG
Ma'Ayn Johnson, SCAG
Marnie Primmer, OCCOG Executive Director
Deborah S. Diep, CDR Executive Director
Matthew S. West, City Manager
Justina Willkom, Assistant Community Development Director
Scott Reekstin, Principal Planner

Attachment: Affordable Housing Communities and Emergency/Transitional Housing Facilities

AFFORDABLE HOUSING COMMUNITIES

Community Name	Number of Affordable Units	Tenant Type
Tustin Gardens	101	Elderly
Kenyon Pointe	71	Family
Westchester Park (Orange Gardens)	150	Family
Flanders Pointe	49	Family
Rancho Alisal	72	Family
Rancho Maderas	54	Family
Rancho Tierra	51	Family
Coventry Court	153	Senior
Tustin Grove	21	Family
Ambrose Lane	5	Family
Heritage Place	54	Senior
Chatham Village (Hampton Square)	210	Family
Tustin Field I	78	Family
Tustin Field II	40	Family
Arbor Walk	10	Family
Cambridge Lane	50	Family
Camden Place	63	Family
Clarendon	42	Family
St. Anton	225	Family
Amalfi Apartments	37	Family
Habitat for Humanity	2	Family
TOTAL	1,538	

EMERGENCY AND TRANSITIONAL HOUSING FACILITIES

Project Name	Number of beds or housing units	Tenant Type
Sheepfold	6	Women and children
Laurel House	6	Youth
Village of Hope	387	Family
Tustin Family Campus	90	Family
Salvation Army at Tustin Field I	6 units	Family
Human Options at Columbus Grove	6 units	Family
Orange Coast Interfaith Shelter	6 units	Family
City Emergency Shelter	80	Men and Women
Veterans Outpost	26 beds	Veterans and their families