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January 5, 2021

Regional Housing Needs Assessment (RHNA) Appeals Board  
Southern California Association of Governments (SCAG)  
900 Wilshire Blvd., Suite 1700  
Los Angeles, CA 90017

**Subject:** Appeal of the Draft RHNA Allocation for the City of Chino Hills  
AGENDA ITEM 1.3

Dear RHNA Appeal Board Members:

On October 22, 2020, the City of Chino Hills filed an appeal of its SCAG's 6th Cycle Draft RHNA allocation. This appeal is based on SCAG miscalculations and failure to follow its established RHNA methodology.

We have reviewed the SCAG staff report for the January 6, 2021 special meeting recommending denial of the Chino Hills' appeal, and are disappointed that SCAG's information continues to contain inaccuracies. Chino Hills' comments to the SCAG staff report responses are provided below:

**SCAG STAFF REPORT ISSUE 1: ...SCAG failed to correctly apply the adopted Final RHNA Methodology for the 6th Cycle RHNA (2021-2029) [Government Code Section 65584.05 (b)(1)]. TAZ DATA IS FLAWED**

**SCAG Staff Response:** ...During the Connect SoCal Growth Vision process, SCAG made revisions to TAZ-level growth, adding approximately 600 households to TAZ 53609100. SCAG then provided Chino Hills with two opportunities on October 31, 2019 and May 26, 2020 to provide responses to this adjustment... SCAG did not receive feedback or technical corrections by the final deadline on June 9, 2020. Therefore, SCAG used the data developed through the Growth Vision process.

**CHINO HILLS Comment:** The TAZ 1432 or 53609101 reference is from the San Bernardino County Transportation Analysis Model (SBTAM) model. SCAG states that it notified Chino Hills regarding "adjustments" to the TAZ data on October 31, 2019 and May 26, 2020. Chino Hills IT Division has no record of email correspondence from SCAG regarding TAZ data on those dates. However, regardless of those missed communications, Chino Hills has been steadily focused on the 6<sup>th</sup> Cycle RHNA process, attending all the RHNA Subcommittee meetings, and providing written comments to SCAG on the RHNA process in four separate letters dated September 6, 2019, November 6, 2019, December 16, 2019, and March 4, 2020. In each of those letters, Chino Hills articulated its concerns about SCAG's misuse of forecast

data, both 2016 and 2045. Specifically, Chino Hills has stated that SCAG's baseline numbers for our City undercounts existing housing supply by about 2,000 units, resulting in an over count of projected housing need. SCAG did not respond to any of Chino Hills' four comment letters.

**SCAG STAFF REPORT ISSUE 2:** ...SCAG failed to adequately consider information related to existing or projected jobs-housing balance [Government Code Section 65584.04(e)(1)].

COMMUTE TIME IS MISCALCULATED

**SCAG Staff Response:** *The adopted RHNA methodology includes a calculation of job accessibility as one of the factors to determine a jurisdiction's draft RHNA allocation. Job accessibility is defined as the jurisdiction's share of regional jobs accessible within a 30-minute commute (additional details are found in the adopted RHNA methodology). This is **not** a measure of the travel times of existing commuters within a jurisdiction; rather, it is a measure of how many jobs can be accessed by a jurisdiction's residents, which can include jobs outside of the jurisdiction...*

**CHINO HILLS Comment:** The SCAG Staff response is incorrect. Chino Hills has a limited number of jobs within its jurisdiction, approximately 0.66 jobs for every household. Chino Hills is not requesting that jobs accessibility be based on jobs within its jurisdiction. Chino Hills is requesting that jobs accessibility be based on the adopted RHNA methodology.

Page 10 of the adopted RHNA methodology clearly states that:

**“Job accessibility is based on the share of the region’s jobs accessible by a thirty (30) minute commute by car in 2045. Importantly, the RHNA methodology’s job access factor is not based on the number of jobs within a jurisdiction from SCAG’s Connect SoCal Plan or any other data source. Rather, it is a measure based on of how many jobs can be accessed from that jurisdiction within a 30-minute commute, which includes jobs in other jurisdictions.”**

Chino Hills has provided information in its RHNA Appeal Request demonstrating that because of the lack of planned transit and highway improvements in Chino Hills, there are relatively few jobs that can be accessed within a 30-minute commute, including jobs in other jurisdictions.

There are currently only two north south connectors in Chino Hills: State Route (SR-) 71, which is a two-lane highway in each direction, and SR-142, which is a one-lane highway in each direction. Both highways operate at capacity during (non-COVID19) peak hours, and average commute times to the major employment hubs north and south of Chino Hills are well over 30 minutes. The SoCal Connect Plan proposes no improvements to SR-71 or SR-142 and no passenger vehicle improvements to other major highways such as the SR-60 or SR-91 that connect to SR-71.<sup>1</sup> Omnitrans, which provides bus service to Chino Hills, recently cancelled all but one transit connection to the City. With no planned improvements, commute times from Chino Hills are not expected to improve now or by 2045, and in fact, are likely to increase as additional RHNA units develop in Chino Hills and surrounding jurisdictions.

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<sup>1</sup> SCAG SoCal Connect, adopted September 3, 2020, Exhibit 3.2 “Sample Major Highway Projects”, and Table 3.2 “Sample Major Highway Projects”.

SCAG ignores this lack of road capacity and transit, and incorrectly assigns Chino Hills 1,393 additional RHNA housing units based on existing job accessibility. The TAZ-level job accessibility map that SCAG includes in their response was created in hindsight on October 22, 2020, considerably after the SCAG RHNA allocation and SoCal Connect Plan were distributed. Adding to the concern about SCAG's incorrect response is that in May 2019, SCAG Local Profile Report for Chino Hills calculated that only 34.7% of Chino Hills residents have commute times of 30 minutes or less.<sup>2</sup> Using this correct data, Chino Hills' "existing need due to jobs accessibility" would change from 1,393 units to 483 units, a 910-unit reduction. This recalculation is consistent with Government Code and SCAG's objective to "Focus on a regional jobs/housing balance to reduce commute times and distances and expand job opportunities near transit and along center-focused main streets."

**SCAG STAFF REPORT ISSUE 3:** ...SCAG failed to adequately consider information related to distribution of household growth assumed for purposes of comparable regional Transportation Plans [Government Code Section 65584.04(e)(3)].

**INACCURATE HQTA REPORTING**

**SCAG Staff Response:** ...SCAG identifies a 'High Quality Transit Area' as generally a walkable transit village or corridor that is within one-half mile of a major transit stop or 'High Quality Transit Corridor' (HQTC) as defined in Government Code... Planned HQTCs and major transit stops are future improvements that are expected to be implemented by transit agencies by the RTP/SCS horizon year of 2045. These are assumed, by definition, to meet the statutory requirements of an HQTC or major transit stop... While there is an inherent chance that transit agencies may change future plans, ultimately SCAG's adopted final RHNA methodology uses this definition of 2045 HQTAs in order to better align future housing with anticipated future transit...

**CHINO HILLS Comment:** Chino Hills does not have any existing transit routes that meet the SCAG HQTA definition. According to the September 2020 Omnitrans Busbook, there is only one fixed bus route with only one bus stop in Chino Hills, Route 88, which stops at Grand Avenue and City Center Drive in Chino Hills and connects to the Chino Transit Center at generally one-hour intervals. Omnitrans, as noted above, has switched to on-demand models and away from bus stops. Omnitrans has no plans for expanding bus service to Chino Hills and there is no existing or planned route at Euclid and Butterfield Ranch Road. The OmniConnects information that SCAG staff includes in its response is, unfortunately, outdated.

SCAG has assigned Chino Hills an "existing need due to HQTA population share" of 887 units based on incorrect and outdated Omnitrans data. Chino Hills has actively coordinated with Omnitrans and regional agencies with the goal to expand transit. In fact, Chino Hills 2015 General Plan contains a policy to "Plan for a transit station within walking distance (as determined by state and regional policy) of Grand Avenue and Peyton Drive". Unfortunately, transit opportunities in Chino Hills continue to decrease. The SoCal Connect Plan (Exhibit 3.7 Priority Growth Area - Transit Priority Areas) identifies no major transit stops and transit priority area in Chino Hills.

Page 10 of the adopted RHNA methodology clearly states that:

"50 percent of the regional existing housing need will be distributed based on a

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<sup>2</sup> SCAG Profile of the City of Chino Hills, Local Profiles Report 2019 (May 2019)

jurisdiction's share of regional residential population within an HQTAs, based on the HQTAs boundaries used in the Final Connect SoCal Plan...**Not all jurisdictions have an HQTAs within their jurisdictional boundaries and thus may not receive existing need based on this factor."**

Consistent with SCAG's stated methodology above, Chino Hills does not have an HQTAs and should not receive an existing need based on this factor. Consequently, the Draft RHNA Plan should be corrected to change Chino Hills' "existing need due to HQTAs population share" from 887 units to zero units.

In summary, the Draft RHNA Plan is required to place houses in jurisdictions with access to jobs. Chino Hills does not have HQTAs areas that facilitate access to jobs and does not have the existing or planned highway capacity to ensure reasonable commute times (30 minutes or less) to employment centers. Placing additional housing in Chino Hills based on incorrect data does not promote improved intraregional relationships between jobs and housing, and would not improve the balance between the number of low-wage jobs and the number of housing units affordable to low-wage workers in Chino Hills.

Based on the information provided in the Chino Hills Appeal and summarized in this letter, Chino Hills RHNA allocation for existing need due to job accessibility and HQTAs population should be adjusted, resulting in a corrected RHNA allocation of 1,923 units.

Thank you for your consideration in this matter. Please feel free to contact me at (909) 364-2741 or [jlombardo@chinohills.org](mailto:jlombardo@chinohills.org), if you have any questions.

Sincerely



Joann Lombardo,  
Community Development Director

cc: Mayor and City Council, City of Chino Hills  
Benjamin Montgomery, City Manager, City of Chino Hills