



CITY OF EASTVALE

12363 Limonite Avenue | Suite 910 | Eastvale, CA 91752
951.361.0900

March 4, 2020

Kome Ajise, Executive Director
Southern California Association of Governments
900 Wilshire Boulevard, Suite 1700
Los Angeles, CA 90017

RE: Request to the Southern California Association of Governments (SCAG) to Amend the Regional Housing Needs Assessment (RHNA) Methodology for the 6th Cycle for the City of Eastvale

Dear Mr. Ajise:

Thank you for the opportunity to comment on the 6th Cycle Regional Housing Needs Assessment (RHNA) Allocation. The City of Eastvale respectfully objects to the methodology utilized to determine the City's RHNA allocation as detailed in this letter.

As of 2018, the US Census Bureau estimates that the SCAG region contains 848,597 housing units. The Department of Housing and Community Development (HCD) recently allocated the region with 1,344,749 new housing units for the 6th RHNA cycle. The allocation for this single cycle represents a 64% increase over the number of existing homes in the entire region. The City of Eastvale is an incorporated city of Riverside County that houses a current population of approximately 73,700 residents. During the 5th Cycle RHNA Final Allocation Plan (1/1/2014 to 10/1/2021) SCAG determined the City of Eastvale's allocation of 1,463 units. The 6th Cycle (6/20/2021 to 10/15/2019) RHNA allocation is proposed the following options:

Option	Housing Units	Increase over 5 th Cycle (Units)
1	3007	1,544
2	3711	2,248
3	3086	1,623

All options listed above represent more than 200% increase from the 5th Cycle allocation. The increases for the region and for the City of Eastvale are disproportionate and inconsistent which has raised concerns by the City of Eastvale. The City of Eastvale's concerns include but are not limited the following:

- The distribution is not feasible because the allocation is disproportionate when compared to the 5th RHNA cycle allocation. The allocation for the City of Eastvale during the 6th Cycle represents more than double the allocation of units for the City of Eastvale during the 5th Cycle;
- The City of Eastvale is predominately built out, with only approximately 10% of land within the City limits available/vacant for development;
- The City of Eastvale is working to achieve a jobs to housing balance, however, it is currently developed with predominately residential units. The jobs to housing balance is imperative when



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addressing vehicle miles traveled (VMT), Air Quality/Green House Gas Emissions, etc. which was not considered when the RHNA was allocated to the City of Eastvale. Currently a large percentage of the residents of the city commute beyond the City of Eastvale and County of Riverside boundaries to job centers in Los Angeles and Orange Counties. The 6th Cycle RHNA allocation further exacerbates the existing jobs to housing gap already existing in the City of Eastvale, limiting the ability for the City to create opportunities of employment;

- The City of Eastvale has limited fixed transit/bus lines, and no passenger rail that services the city. With existing bus routes achieving headways of half an hour or more, the service would not help facilitate increase density needed to achieve affordable housing, or allow the City of Eastvale to qualify for housing programs, grants, and/or funding; and
- Given the historical number of units constructed on an annual basis in our region, the allocation is unobtainable and unprecedented in a single RHNA cycle.

The City of Eastvale supports modifications of the allocation to incorporate these concerns and those expressed by other cities within the Western Riverside Council of Governments (WRCOG) and Southern California Association of Governments (SCAG). Therefore, the City of Eastvale requests that the RHNA Subcommittee, CEHD Policy Committee, and Regional Council consider the three recommendations listed below prior to the adoption of the RHNA in order to solve the housing crisis in an equitable and attainable way:

- **Deny the SCAG/HCD Approved Alternative RHNA Methodology**
The City of Eastvale requests the denial of the approved alternative RHNA methodology, proposed by Mayor Rusty Baily of Riverside, due to the elimination of the household growth component which effectively eliminates any and all local input. To the point, the City of Eastvale objects to the alternative RHNA methodology because the allocation assigned to the City of Eastvale was increased after the previous meeting without notification or explanation on the revised rationale. At a minimum, SCAG should provide the City with the rationale for the revised allocation methodology.
- **Introduce and Approve the RHNA Methodology proposed by the City of Cerritos**
The City of Cerritos recently submitted a proposal dated February 4, 2020, which recommends that the household growth projection component be reintroduced back into the RHNA methodology. The components used in the methodology would be the following: household growth (33.3%), job accessibility (33.3%), and population within high quality transit areas (33.3%). We believe that the household growth projections play an important role in determining appropriate housing units because it takes into consideration the unique characteristics of each jurisdiction. Moreover, household growth projections more closely align the RHNA with the development patterns established in Connect SoCal, as required by state statute. Furthermore, the reintroduction of household growth into the RHNA methodology would satisfy the five objectives of state housing law, pursuant to Gov. Code Sec. 65584(d).




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- **Contest the State of California's Allocation of 1.34 Million Housing Units to the SCAG Region**
We request that SCAG contest the regional housing allocation of 1.34 million units because the HCD did not follow state law with the regional determination [see Government Code Section 65584.01(a)]. Furthermore, the Department of Finance recently updated its population projections which resulted in a significant decrease in the previous forecast. Governor Newsom also stated that his commitment to build 3.5 million homes by 2025 was a "stretch goal" and that the state would soon release a more pragmatic estimate on the housing need for each region in the state. Therefore, the regional determination of 1.34 million housing units is both inaccurate and premature and will lead local jurisdictions on a path to noncompliance with state housing law.

Given the diminished level of available land in the City, market conditions and economically unsustainable land use model the RHNA allocation is unrealistic and arguably unobtainable. The City of Eastvale is not opposed to providing its fair share of affordable housing in the region, however, this fair share should be supported by a methodology that is equitable and agreeable to the city. Therefore, the City of Eastvale respectfully requests consideration of the recommendations and points raised in this letter prior to the adoption of the RHNA. Should you have any questions or wish to meet regarding the allocation issues raised herein, please do not hesitate to contact Gina Gibson Williams, Community Development Director at (951) 903-4425 or ggibson-williams@eastvaleca.gov.

Sincerely,



Bryan Jones
City Manager
City of Eastvale