No. 5
MEETING OF THE
REGIONAL HOUSING NEEDS
ASSESSMENT SUBCOMMITTEE

Friday, June 24, 2011
10:00 a.m. – 12:00 p.m.

Coachella Valley Association of Governments
73-710 Fred Waring Drive, Suite 200
Conference Room  MSW*
Palm Desert, CA 92260
Phone: (760) 346-1127
* Note change in room location

Teleconference Available
Grand Hyatt Hotel
600 E. Market St.
San Antonio, TX 92243

Videoconference Available
Southern California Association of Governments
818 West 7th Street, 12th floor
Los Angeles, CA 90017

Imperial Office
1405 North Imperial Avenue, Suite 1
El Centro, CA 92243

Orange County Office
600 S. Main Street, Suite 906
Orange, CA 92863

San Bernardino County Office
1170 W. 3rd Street, Ste 140
San Bernardino, CA 92410

Ventura Office
950 County Square Drive, Suite 101
Ventura, CA 93003

The Regional Council is comprised of 84 elected officials representing 190 cities, six counties, six County Transportation Commissions and a Tribal Government representative within Southern California.
If members of the public wish to review the attachments or have any questions on any of the agenda items, please contact Cathy Alvarado at (213) 236-1896 or via email alvarado@scag.ca.gov.

SCAG, in accordance with the Americans with Disabilities Act (ADA), will accommodate persons who require a modification of accommodation in order to participate in this meeting. If you require such assistance, please contact SCAG at (213) 236-1928 at least 72 hours in advance of the meeting to enable SCAG to make reasonable arrangements. To request documents related to this document in an alternative format, please contact (213) 236-1928.
Regional Housing Needs Assessment Subcommittee
Member List

San Bernardino County:  Hon. Bill Jahn, Big Bear Lake, District 11 (Alternate): Chair
                      Hon. Ginger Coleman, Apple Valley, District 65 (Primary)

Los Angeles County:    Hon. Margaret Finlay, Duarte, District 35 (Primary)
                      Hon. Steven Hofbauer, Palmdale, District 43 (Alternate)

Orange County:         Hon. Sukhee Kang, Irvine, District 14 (Primary)
                      Hon. Ron Garcia, Brea, OCCOG (Alternate)

Riverside County:      Hon. Darcy Kuenzi, Menifee, WRCOG (Primary)
                      Hon. Randon Lane, Murrieta, WRCOG (Alternate)

Ventura County:        Hon. Bryan MacDonald, Oxnard, District 45 (Primary)
                      Hon. Carl Morehouse, Ventura, District 47 (Alternate)

Imperial County:       Hon. Cheryl Viegas-Walker, El Centro, District 1 (Primary)
                      Hon. Jack Terrazas, Imperial County (Alternate)
The Regional Housing Needs Assessment Subcommittee may consider and act upon any of the items listed on the agenda regardless of whether they are listed as information or action items.

CALL TO ORDER & PLEDGE OF ALLEGIANCE
(Hon. Bill Jahn, Chair)

PUBLIC COMMENT PERIOD – Members of the public desiring to speak on items on the agenda, or items not on the agenda, but within the purview of the Committee, must fill out and present a speaker’s card to the Assistant prior to speaking. Comments will be limited to three (3) minutes. The Chair may limit the total time for all comments to (20) twenty minutes.

REVIEW AND PRIORITIZE AGENDA ITEMS

CONSENT CALENDAR

Approval Item

1. Minutes of the May 27, 2011 Meeting
   Time: Attachment
   Page No: 1

2. RHNA Subcommittee Topic Outlook
   Time: Attachment
   Page No: 7

Receive & File

3. Correspondence Received and Responses
   Time: Attachment
   Page No: 9

INFORMATION ITEMS

4. Update on Draft RHNA Consultation Packet to the California Department of Housing and Community Development Department (HCD)
   (Doug Williford, Deputy Executive Director, Planning & Programs)

   Staff will provide an update on the regional determination process with HCD.

5. Demolition Permits and the Determination of RHNA Replacement Need
   (Frank Wen, SCAG Staff / Ma’Ayn Johnson, SCAG Staff)

   Staff will provide an overview of the survey on to determine replacement need that was distributed to local jurisdictions.
6. **AB 2158 Factor Survey**  
   *(Ma’Ayn Johnson, SCAG Staff)*

   Staff will provide an overview of the AB 2158 Factor Survey that was distributed to jurisdictions for their input on local planning opportunities and constraints.

**ACTION ITEMS**

7. **RHNA Social Equity Adjustment**  
   *(Ma’Ayn Johnson, SCAG Staff / Frank Wen, SCAG Staff)*

   Staff will outline options to address the social equity adjustment required as part of RHNA methodology.

   **Recommended Action:** Recommend that a 110% social equity adjustment be included as part of the proposed RHNA methodology.

**CHAIR’S REPORT**

**STAFF REPORT**  
*(Mark Butala, SCAG Staff)*

**ANNOUNCEMENTS**

**ADDITIONAL PUBLIC COMMENT**

**ADJOURNMENT**  
The next regular meeting of the Regional Housing Needs Assessment Committee will be held on Friday, July 29 at the SCAG downtown Los Angeles office.
The Regional Housing Needs Assessment Subcommittee (RHNA) of the Southern California Association of Governments (SCAG) held its meeting at the SCAG Los Angeles Office. The meeting was called to order by Chair Bill Jahn. There was a quorum.

**Present**

Representing Los Angeles County  
Hon. Margaret Finlay, Duarte, District 35 (Primary)  
Hon. Steven Hofbauer, Palmdale, District 43 (Alternate)  

Representing Orange County  
Hon. Sukhee Kang, Irvine, District 14 (Primary) - via videoconference  

Representing Riverside County  
Hon. Darcy Kuenzi, Menifee, WRCOG (Primary) - via teleconference  
Hon. Randon Lane, Murrieta, WRCOG (Alternate) - via videoconference  

Representing San Bernardino County  
Hon. Ginger Coleman, Apple Valley, District 65 (Primary)  
Hon. Bill Jahn, Big Bear Lake, District 11 (Alternate); Chair  

Representing Ventura County  
Hon. Bryan MacDonald, Ventura, District 45 (Primary) – via videoconference  

Representing Imperial County  
Hon. Cheryl Viegas-Walker, El Centro, District 1 (Primary) – via teleconference  

**CALL TO ORDER AND PLEDGE OF ALLEGIANCE**

The Hon. Bill Jahn, Chair, called the meeting to order at 9:10 a.m.
PUBLIC COMMENT PERIOD

MaryAnn MacGillivray, City of Sierra Madre, inquired whether the Public Comment period could also be held at the end of every meeting after the discussions have taken place. Hon. Bill Jahn was agreeable to the suggestion and asked staff to add the item to future agendas.

Ms. MacGillivary also inquired if the letter from the City of Hermosa Beach, item 3 on today’s Consent Calendar, would be responded to only to the City or whether the subcommittee would make comments regarding Hermosa Beaches concerns, because most of the comments in the letter could apply in some way to the City of Sierra Madre and also to smaller cities.

REVIEW AND PRIORITIZE AGENDA ITEMS

No comments.

CONSENT CALENDAR

Approval Items

1. Minutes of April 19, 2011 Meeting
2. RHNA Subcommittee Topic Outlook
3. Correspondence Received – City of Hermosa Beach

A motion (Finlay) was made to approve the Consent Calendar. The motion was SECONDED (Coleman) and UNANIMOUSLY approved.

INFORMATION ITEMS

4. Draft RHNA Consultation Packet to State Housing and Community Development Department (HCD)/Department of Finance (DOF)

Hon. Bill Jahn informed the subcommittee that staff would be sending a letter/packet to HCD in the next few weeks regarding this item. Today’s staff report outlines key issues to be addressed in HCD’s Regional Housing Need Determination.

Huasha Liu, SCAG, stated there were three key items that SCAG needs to consult with HCD with regard to pending issues:

1.) How the region will handle the tribal land?
   Staff believes that the RHNA numbers should not reflect any household growth on tribal land.

2.) How does the region project the replacement need as added to the total housing units?
   Staff recommends using the same 0.7% replacement rate that HCD has approved
SANDAG to use. In the meantime, SCAG can collect further data and do further analysis to refine the number.

3.) How does the region determine the vacancy rate and the total amount of housing units for the future?
   Staff recommends that instead of using the higher percent previously used, 1.5% be applied for owner-occupied properties and 4.5% for rental properties.

For the last RHNA, HCD had previously given SCAG a rate to account for the healthy market vacancies. The rate was previously 2% for owner occupied units and 5% for the rental units. This time around when staff evaluated the current state of the housing market, staff recommends to the HCD that 1.5% be used for owner occupied units and 4.5% for renter occupied units.

With the statistics from the 2010 census demographic and housing profiles, staff compared so-called effective vacancy rate with the healthy market vacancy rate. The definition of effective vacancy rate from housing planning perspective is a vacant unit that is currently for sale or rent. These are the vacant units that are readily available to accommodate population or household growth.

Douglas Williford, SCAG, pointed out that a lot of cities in the region currently have very high vacancy rates compared to the more theoretical HCD assumed for healthy vacancy rates. For example, if a city currently has a 15% vacancy rate and has a 5% healthy city vacancy rate, there is going to be a gap of a certain number of units depending on how big that city is. The vacant units are then able to be used by that city to meet the first thousand units of its RHNA allocation.

Ms. Liu pointed out that the RHNA replacement need entailed two key points: 1) the higher replacement rate SCAG has used in the past, somehow staff can not find accurate data to justify that and, 2) this time around staff needs to be careful not to use higher replacement rates to add additional burden on the housing units needed. Currently staff proposes to use the same rate, 0.7%, that San Diego Association Governments (SANDAG) is using. During the next month staff will attempt to collect the data from our local jurisdictions to see if the rate can be refined.

The key items that staff will consult with HCD and DOF as appropriate are the following:
- Population and household growth on tribal land
- Replacement housing allowance and determination, including:
  - Data
  - Methodology to accurately estimate the appropriate replacement housing allowance
  - Household income allocation for the replacement housing allowance
- Additional vacant units that can be applied towards housing construction needs
Staff will continue to work with the sub-regions and key stakeholders on the packet in the next one-three months to settle the consultation process so that staff can get a regional housing need determination from HCD by August 2011.

5. RHNA Social Equity Adjustment

Ma’Ayn Johnson, SCAG, gave an explanation on how a social equity adjustment is applied to the RHNA methodology and household growth numbers for jurisdictions. The social equity adjustments are divided into four income categories based on median county income:

- Very Low - 50% or less
- Low – 50-80%
- Moderate – 80-120%
- Above Moderate – 120% and above

To apply a social equity adjustment the County averages for income categories are looked at and is the basis of how the social equity adjustment is applied.

Ms. Johnson gave the Committee a couple of examples using the Fair Share Adjustment. Assumed 60%, 110%, and 150% adjustment would mitigate an overconcentration of those income groups for its RHNA allocation. Staff has not made a recommendation yet but did want to introduce the item so the Committee would be familiar with the concept.

Ty Schuiling, SANBAG, pointed out that the statute is about inter-county fair share adjustment but looking at Statute Section 655588.03, the program is also supposed to improve intra-regional relationship between jobs and housing, which gets to the issue of fair share between counties, not just within counties. If we are talking about only fair share adjustments within counties, will SCAG address the issues of the disparities between the coast and inland counties relative to fair cost housing?

Joann Africa, SCAG, responded that SCAG’s methodology will have a jobs housing component to it.

ACTION ITEM

6. Subregional Delegation Guidelines

Joann Africa, SCAG Chief Counsel, stated that this was the third time the Subcommittee discussed delegation and staff had previously presented draft guidelines for those entities that would be interested in RHNA delegation for the fifth RHNA cycle. At the last Subcommittee meeting it was noted that it is possible that a delegated subregion’s allocation methodology may have a different fair share or social equity adjustment than the region’s social equity which would create a gap. What was left pending in the Guidelines is how to address that gap. Staff has prepared options for the Subcommittee to address the gap. Additionally, staff has incorporated Option #4 into the Guidelines.

The four options for how to deal with the gap are:
1) The subregion chooses the same fair share adjustment as SCAG
2) An adjustment between SCAG and the subregion
3) A numerical weighting for gap distribution based on household growth
4) Requires that the subregion maintains all assigned units unless already impacted

Mr. Williford stated that staff’s recommendation is for Option #4. The social equity adjustment, to be discussed this summer by the Subcommittee and eventually the Regional Council (RC), will be a fundamental policy decision for the entire region on how much social equity adjustment it is going to choose. As an example, if the RC chooses the 110% adjustment, the policy question is, is it a good idea or not a good idea for cities taking delegation who choose a different social equity percentage, which the city would do to reduce its burden, but have the effect of a bigger gap than otherwise would have been made up by cities who are not within that delegated area? Is this fair or appropriate because they are impacted cities, or is not fair not appropriate because it would be over and above the gap that the RC already decided? SCAG’s judgment by recommending #4, is that it is not appropriate. #4 states that if there was a subregional delegation, and the result of them applying their methodology was a gap of low and very low need over and above what the RC would have decided for that area then that additional gap needs to be rectified within the cities of that subregional delegation and not spread to cities outside that subregional delegation.

**Recommended Action:** Recommend to CEHD approval of Option #4 of RHNA Subregional Delegation Guidelines.

A motion (Viegas-Walker) was made to move Staff recommendation on Option #4. The motion was SECONDED (Coleman) and UNANIMOUSLY approved.

**ADDITIONAL PUBLIC COMMENT**

Ms. MacGillivray stated that when it comes to the social equity situation of the RHNA the region seems to mathematically equivocating a process to define the way people live. Ms. MacGillivray stated she hoped that the outcome is not homogenize all the communities within the region. There ought to be another way to look at some of these processes, particularly within subregional delegation, to not force the things into the communities that we do not want.

Lauri Aylaian, City of Palm Desert, stated that there was a concern in the Coachella Valley with regards to areas that have a large number of second homes and how those vacancies are created. What we find is in most cases the second homes are not used by their owners and they are rented out anywhere from six months to a couple of years and they do serve as primary residences on a rental basis. The Coachella Valley has large populations that are accommodated in these second homes. If the Coachella Valley is credited for these we end up producing large amounts of housing that is not used because new housing is not as affordable as a second home to a desperate primary homeowner who is looking for somebody to help them share the cost of their second home. This is
relevant and important to a number of the cities in Coachella Valley and we hope that not all cities and areas are treated identically with the process because the Coachella Valley does operate differently from the rest of Riverside County and the rest of the SCAG region.

CHAIR’S REPORT

None

FUTURE AGENDA ITEMS

No future agenda items were discussed.

ADJOURNMENT

There being no further business, the Regional Housing Needs Assessment Subcommittee meeting adjourned at 11:13 a.m.

Huasha Liu
Director, Land Use and Environmental Planning
## Draft RHNA Schedule (February 2011 to September 2012)

<table>
<thead>
<tr>
<th>Meeting</th>
<th>Proposed Date</th>
<th>Subject</th>
<th>Action</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>February 23, 2011</td>
<td>Overview of RHNA Process; review RHNA Task Force recommendations; RHNA work plan and schedule; subregional delegation guidelines; evaluate issues between the DOF and Census projections; notification to HCD and Caltrans of RTP/SCS adoption date; discussion on Integrated Growth Forecast foundation</td>
<td>Approve charter; approve RHNA work plan and schedule; recommend to CEHD to notify HCD and Caltrans of RTP/SCS adoption date</td>
</tr>
<tr>
<td>2</td>
<td>March 22, 2011</td>
<td>Subcommittee Charter; subregional delegation</td>
<td>Approve the RHNA Subcommittee Charter</td>
</tr>
<tr>
<td>3</td>
<td>April 19, 2011</td>
<td>Changes to housing element requirements; AB 2158 factor discussion; draft RHNA methodology framework, Subregional delegation agreement</td>
<td></td>
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<tr>
<td>4</td>
<td>May 27, 2011</td>
<td>Regional determination update; Social equity adjustment discussion; Subregional delegation agreement</td>
<td>Provide direction on subregional delegation</td>
</tr>
<tr>
<td>4</td>
<td>June 24, 2011</td>
<td>Update on RHNA consultation with HCD; social equity adjustment; replacement needs survey; AB 2158 factor survey</td>
<td>Recommend a social equity adjustment to CEHD</td>
</tr>
<tr>
<td>5</td>
<td>July 29, 2011</td>
<td>Replacement need survey results; AB 2158 factor survey results; continued discussion on methodology; overcrowding; at-risk affordable units; high housing cost burdens; farmworker housing</td>
<td>Recommend methodology application of overcrowding, at-risk affordable units, high housing cost burdens, and farmworker housing to CEHD</td>
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<tr>
<td>6</td>
<td>August 26, 2011</td>
<td>Review regional housing need determination from HCD</td>
<td></td>
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<tr>
<td>7</td>
<td>September 23, 2011</td>
<td>Public hearing to consider requests for revision of the proposed allocation to delegated subregions</td>
<td>Review and determine revision requests of proposed allocation for delegated subregions</td>
</tr>
<tr>
<td>8</td>
<td>January 27, 2012</td>
<td>Discussion on trade and transfer agreement guidelines; RHNA revisions and appeals process guidelines</td>
<td>Recommend trade and transfer agreement guidelines; recommend RHNA revisions and appeals process guidelines</td>
</tr>
<tr>
<td>9</td>
<td>July 2012</td>
<td>Review submitted revision requests</td>
<td></td>
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<tr>
<td>10</td>
<td>July 2012</td>
<td>Review submitted revision requests</td>
<td>Recommend to CEHD results of revision requests</td>
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<tr>
<td>11</td>
<td>Mid-September 2012</td>
<td>Hearing on appeals</td>
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<td>12</td>
<td>Mid-September 2012</td>
<td>Hearing on appeals</td>
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<tr>
<td>13</td>
<td>Mid-September 2012</td>
<td>Hearing on appeals</td>
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<tr>
<td>14</td>
<td>Mid-September 2012</td>
<td>Final meeting</td>
<td>Recommend to CEHD final appeals determinations</td>
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<td>Proposed Date</td>
<td>Meeting</td>
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<tr>
<td>March 5, 2011</td>
<td>CEHD</td>
<td>Approve Subcommittee charter; approve RHNA schedule and work plan</td>
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<tr>
<td>March – September</td>
<td>P&amp;P TAC, Subregional Coordinators meetings</td>
<td>Discuss input on RHNA methodology discussion from Subcommittee</td>
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<tr>
<td>April 7</td>
<td>CEHD</td>
<td>Approve Subcommittee charter</td>
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<tr>
<td>April 7</td>
<td>Regional Council</td>
<td>Approve RHNA schedule</td>
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<tr>
<td>June 2</td>
<td>CEHD and Regional Council</td>
<td>Approve subregional delegation agreement</td>
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<td>June 2</td>
<td>Regional Council</td>
<td>Approve Subcommittee charter</td>
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<td>September 1</td>
<td>CEHD</td>
<td>Recommend release of proposed RHNA methodology</td>
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<td>September 1</td>
<td>Regional Council</td>
<td>Public hearing on subregional allocation and determine share of housing need for delegated subregions</td>
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<tr>
<td>October 6</td>
<td>Regional Council</td>
<td>Public hearing on proposed methodology</td>
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<tr>
<td>November 3</td>
<td>Regional Council</td>
<td>Approve final allocation for delegated subregions</td>
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<tr>
<td>December 1, 2011</td>
<td>Regional Council</td>
<td>Hearing on final RHNA methodology</td>
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<td>February 2, 2012</td>
<td>CEHD</td>
<td>Approve trade and transfer guidelines; approve RHNA revisions and appeals process guidelines</td>
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<tr>
<td>March 1</td>
<td>Regional Council</td>
<td>Approve trade and transfer guidelines; approve RHNA revisions and appeals process guidelines</td>
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<tr>
<td>April 5</td>
<td>CEHD and Regional Council</td>
<td>Release of draft RHNA allocation</td>
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<tr>
<td>October 6, 2012</td>
<td>CEHD</td>
<td>Approve proposed final RHNA allocation plan</td>
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<tr>
<td>October 6, 2012</td>
<td>Regional Council</td>
<td>Public hearing on final RHNA allocation plan</td>
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June 2, 2011

Huasha Liu
Director of SCAG Land Use and Environmental Planning
Southern California Association of Governments
818 W. Seventh Street, 12th Floor
Los Angeles, CA 90017-3435

RE: City of Malibu Comments on SCAG's Integrated Growth Forecast, Malibu Local Profile and the Preliminary Land Use Scenarios

Dear Ms. Liu:

This letter is intended to assist SCAG in preparing the 2012 Regional Transportation Plan (RTP), Regional Housing Needs Assessment (RHNA), and Sustainable Communities Strategy (SCS) by providing information regarding land use, development trends and special circumstances related to the City of Malibu. We appreciate the opportunity to provide this information and look forward to working with SCAG staff and the Policy Committees through the development of these important plans.

The City of Malibu has reviewed the assigned projections to ascertain whether they are consistent with the General Plan Land Use (LU) Element, the Malibu Municipal Code and the Local Coastal Program (LCP).

The City offers comments on the following SCAG documents:

1. Land Use Scenario Maps and SCAG Data / Maps Guide (received by the City on January 6, 2011);
2. Draft Local Profile Report for Malibu – February 2011 (received on March 4, 2011); and
3. Revised Integrated Growth Forecast (received on May 13, 2011).

1. Land Use Scenarios

After reviewing the Land Use Scenario Maps provided to City staff via email, we have the following general comments:

A. Two large mobile home parks are incorrectly indicated as industrial and commercial land uses. The City accommodates 554 housing units on the 179.7 acres which make up these parks.
B. There are isolated pockets of commercial land uses in the residential areas which we believe may be home businesses. It appears that home based businesses are changing the primary land uses from residential to commercial/industrial.

C. Large sections of designated State, County and City parklands are incorrectly indicated as vacant land. The 2008 Land Use Map prepared by SCAG designates 763.8 acres as open space and recreation. The City’s updated map designates 2,672.3 acres as open space and recreation, which accounts for a difference of 1,908.5 acres.

D. Several other parcels that are shown as vacant are already part of existing residential development and should be listed as undevelopable.

An updated Land Use Map which reflects current land uses in the City is attached with this letter (Attachment 1). This map should replace the map entitled “Existing Land Use in City of Malibu” in the SCAG Data / Maps Guide. Shapefiles of the updated map will be mailed directly to Javier Minjares. Please provide direction on how the City can rectify the errors that we have found on the land use maps.

Items of note on the updated Land Use Map are:

i. There is only one parcel designated as Mixed Urban. This parcel contains an existing legal non-conforming mixed use development comprised of single-family residence and a mixed commercial and industrial glass business (APN 4458-027-034);

ii. A large parcel in the Civic Center area that contains Legacy Park has been designated as commercial because it contains a two commercial uses at the far corners (APN 4458-020-903). However, 15 acres of that site is a City park. Is there any way to designate only the portions of the site commercial and the rest as undevelopable?

iii. When designating land use for the various residential properties, we categorized them as follows:
   a. Parcels less than 10,000 sq. ft. in size → High-Density Single Family Residential (1111)
   b. Parcels equal to or greater than 10,000 sq. ft. but less than 1 acre in size → Low-Density Single Family Residential (1112)
   c. Parcels equal to or greater than 1 acre but less than 10 acres in size → Rural Residential, High Density (1151)
   d. Parcels greater than 10 acres in size → Rural Residential, Low Density (1152)

In addition, enclosed please find the City’s specific comments on the SCAG Data / Maps Guide (Attachment 2).

2. Local Profile Report for Malibu

After reviewing the February 2011 Draft Local Profile Report (LPR), we have the following comments:

A. Pg. 5 includes a bar graph of population by age. When adding the various age groups for each of the three time periods (2000, 2010 and 2015), it appears that there was an increase of 70 permanent residents between 2000 and 2010, which is accurately reflected on the previous page. However, when extrapolating the
predicted growth between 2010 and 2015 (as denoted by the grey bars on the graph), the graph predicts an approximate gain of 1,605 permanent residents during five year period, from 12,645 to approximately 14,250. This number does not follow any trends and seems extremely high when related to the growth of 70 permanent residents during the ten year period between 2000 and 2010.

B. Page 11 of the LPR includes a bar graph depicting Housing Production in the City between 2000 and 2010. The graph indicates that there were 360 building permits issued for residential units during this time period. Staff has researched City building permits for new residential units and provides the following annual information:

<table>
<thead>
<tr>
<th>Year</th>
<th>Permits</th>
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<tbody>
<tr>
<td>2000</td>
<td>52 permits</td>
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<tr>
<td>2001</td>
<td>47 permits</td>
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<td>2002</td>
<td>53 permits</td>
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<tr>
<td>2009</td>
<td>20 permits</td>
</tr>
<tr>
<td>2010</td>
<td>12 permits</td>
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</tbody>
</table>

The City issued 357 permits for the period from 2000 to 2010, not 360 permits as the LPR indicates.

C. The employment figures listed for Malibu on page 14 of the LPR show an employment level of 8,179 jobs in 2010. Please provide additional information as to where these jobs are originating from as the number seems unrealistically high for the amount of commercial development in the City. Staff is concerned that businesses which are located outside of City limits have been included in this total. In addition, it is common practice for business owners to list the name of their company as being in Malibu for the name cache, when the actual physical location of the business and employees may be located outside the City limits. It is also likely that some small businesses have been geocoded at the owner’s address in Malibu while many of the employees are located elsewhere.

3. Revised Integrated Growth Forecast

City staff has reviewed the revised integrated growth forecast and does not agree with the numbers forecasted for population, households and employment based on the following assumptions:

A. Household Growth Need and Vacation Homes

Like many jurisdictions in mountain, beach and desert resort areas, Malibu has a significant number of vacation homes. Malibu's Local Profile highlights that as of the 2010 Census, there were 6,864 housing units and 5,267 households; which is a difference of 1,597 units that are not occupied by full-time households. We anticipate that many of these additional units, which account for 23 percent of the total units in the City, are used for vacation homes and not permanent residences.

It is important that the methodology for assigning growth take this into account. For example, if a significant portion of new units built in the past were second homes, that
portion of new units should not be included when estimating the future development rate and capacity since second homes do not accommodate household growth need.

The full time resident population increase equaled a total of 130 new households between 2000 and 2010 (an average of 13 per year). Staff feels strongly that the City’s RHNA allocation should be commensurate to the actual growth shown in Malibu over the last ten years.

B. Replacement Housing Need

Units Lost in Natural Disasters

It is our understanding that the RHNA methodology for the 2006-2014 cycle included replacement need as a component of the total construction need. It should be noted that in some jurisdictions such as Malibu, fires or other natural disasters result in an artificially high number of units lost as compared to the normal process that occurs when a property owner chooses to improve or redevelop a parcel for economic or personal reasons.

For example, the 1993 Old Topanga Fire resulted in the destruction and damage of approximately 270 homes within the City. Applications to rebuild these sites are still being processed through the City and may be counted towards Malibu’s housing replacement needs. Additionally, the firestorm of 2007 (Canyon Fire, Corral Fire and Malibu Road Fire) resulted in the loss of 20 single-family homes plus four guest houses within the City. Furthermore, two single-family homes were lost in the July 3, 2008 PCH Fire.

We request that this be taken into account in the new methodology, and those jurisdictions where natural disasters have occurred not be penalized by assigning additional housing replacement need. Such “disaster replacement” building permits should also be removed from the calculations of the anticipated rate of new development.

Income Categories for Replacement Units

A recent trend has occurred in Malibu related to the demolition of older existing residences and replacing them with larger residences. In some cases, three or four adjacent residences have been demolished, the lots merged and one large residence constructed in their place. Since 2005, permits have been issued by the City to demolish a total of 58 single-family residences and reconstruct 51 new residences in their place.

Another trend has been to convert non-conforming multi-family residences into single-family residences. Since 1995, permits have been issued to convert a total of 19 multi-family units into five single-family residences in addition to decreasing 33 existing multi-family units to 24 multi-family units.

We are concerned about the methodology that will be used to assign replacement housing units to income categories. It is our understanding that in the previous RHNA cycle, replacement need was distributed to income categories in the same proportion as total construction need. We are pleased to note that the agenda packet for your May 27, 2011 meeting included a brief discussion of this topic and indicated that it is SCAG’s intent to revisit this issue.
We believe a strong case can be made for a different method of assigning replacement need to income categories. For example, the methodology for distributing household growth need based on Census data typically results in about 40% of the total need being allocated to the very-low and low categories, with adjustments to avoid impaction. As you know, under state Housing Element law lower-income need must be accommodated on land zoned for high-density multi-family development. Therefore, we believe it would be more appropriate for replacement need to be allocated to income categories based on the type of units demolished rather than the jurisdiction-wide income distribution. Under this approach, demolished multi-family buildings might be assigned to the very-low or low category while lower-density condos or single-family detached houses would be assigned to the moderate or above-moderate category respectively. It would clearly be an unfair application of the RHNA process if a jurisdiction where 100 single-family homes were replaced with new homes were allocated a replacement need of 40 high-density apartments and 60 additional moderate and above-moderate units.

C. City-Specific Constraints on Development

The City cites Section 65584.04(d)(2) of Assembly Bill (AB) 2158 regarding the following specific constraints on development in the City of Malibu:

1. In September 2010, the California State Water Quality Control Board amended its Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties by prohibiting onsite wastewater disposal systems in the Malibu Civic Center area. The prohibition allows no new onsite wastewater treatment systems (OWTS) in the area and requires the City to phase out commercial OWTS by 2015 and residential OWTS by 2019. The Civic Center area supports a population of approximately 2,000 residents and is the core of the City’s business and commercial activities.

As the City is not served by a sewer system, individual or small package treatment plants are currently the only means available for effluent disposal. The State’s prohibition of OWTS in the Civic Center area is one factor which significantly affects the City’s ability to provide necessary infrastructure for some of the additional development allocated during this RHNA planning period.

2. There is a discrepancy between the amount of land suitable for development or for conversion to residential use. As noted earlier in this letter there were an additional 1,908.5 acres of land shown as vacant, and therefore having a development potential, when in reality those parcels are public open space owned and operated by various Federal, State and local agencies. These sites are not available to be put towards future housing needs of the City.

In addition, a majority of the vacant properties left in the City are undeveloped due to unfavorable site conditions. As stated in the City of Malibu General Plan:

"Environmental constraints will limit the ultimate buildout of both residential and commercial development in the City. For example, the City’s slope density formula will reduce the potential for subdivision and development of larger parcels in the City... There are practical impediments to development of many areas of the City, such as natural constraints and the cost of infrastructure. For example, more than 50% of the vacant,
June 2, 2011

residentially designated land in Malibu is of a slope greater than 35% and not suitable for development."

3. Since the last RHNA cycle, the City was legally obligated to adopt a Local Coastal Program (LCP) as written by the California Coastal Commission (CCC) in 2002. In the LCP, Overlay Maps were provided which designated large portions of the City as Environmentally Sensitive Habitat Areas (ESHA) (refer to Attachment 3). According to the maps, approximately 5,952 acres within the City are classified as ESHA. The LCP includes strict provisions for development on sites which contain or are adjacent to ESHA. These provisions include:

a. Limits on the size of development:
   i. The allowable development area on parcels where all feasible building sites are ESHA or ESHA buffer (located within 200 feet of ESHA) shall be 10,000 square feet or 25 percent of the parcel size, whichever is less. For parcels over 40 acres in size, the maximum development area may be increased by 500 sq. ft. for each additional acre over 40 acres in parcel size to a maximum of 43,560 sq. ft. in size. The development must be sited to avoid destruction of riparian habitat to the maximum extent feasible. The development area shall be reduced, or no development shall be allowed, if necessary to avoid a nuisance.

b. Restrictions on lot line adjustments:
   i. If ESHA is present on any of the parcels involved in the lot line adjustment, the lot line adjustment cannot increase the amount of ESHA that would be damaged or destroyed by development on any of the parcels, including any necessary road extensions, driveways, and required fuel modification.

c. Restrictions on subdivisions:
   i. Cannot subdivide a parcel that consists entirely of ESHA and/or ESHA buffer or create a new parcel that consists entirely of ESHA and/or ESHA buffer.
   ii. Cannot create any new parcels without an identified, feasible building site that is located outside of ESHA and the ESHA and that would not require vegetation removal or thinning for fuel modification in ESHA and/or the ESHA buffer.
   iii. Cannot result in construction of roads and/or driveways in ESHA, or ESHA buffer.

The designation of a property as ESHA or ESHA buffer severely limits the development potential on properties within the City and should be taken into consideration.

City staff would like to set up a meeting with SCAG staff to discuss the 2012 RTP process. If you have any further questions, please contact Stephanie Danner, Senior Planner, at sdanner@malibucity.org or at (310) 456-2489 x 276.

Yours truly,

[Signature]

Joyce Parker Bozyinski, AICP
Planning Manager
Attachments:
1. Updated Land Use Map
2. Specific Comments on the SCAG Data / Maps Guide
3. LCP ESHA Overlay Maps

CC:
- The Honorable Bill Jahn, Chair RHNA Subcommittee
- Hasan Khattar, SCAG Executive Director
- Frank Wen, Ph.D., Manager of SCAG Research, Analysis and Information Services
- Matthew Horton, SCAG Regional Affairs Officer – Los Angeles County
- Javier Minjares, SCAG Regional Planner Specialist
- Jim Thorsen, Malibu City Manager
- John H. Douglas, City of Malibu Housing Consultant
Local Coastal Program - City of Malibu

ESHA Overlay Map 1:
Nicholas Canyon to Trancas Beach

- Environmentally Sensitive Habitat Areas
- Pismo Clam Habitat
- Near Shore Shallow-water Fish Habitat
- Kelp Beds
- Areas Utilized by Sea Lions
- Streams

*Boundaries of ESHAs may change location over time due to varying circumstances. This map is not intended to depict fixed boundaries of ESHAs or marine resources and is not to include areas that are not ESHAs. This map does not establish any final boundary lines or constraints on the Commission's ability to identify, map and regulate ESHAs and Marine Resources in the City of Malibu.

Source: Malibu Santa Monica Mountains Area Plan:
Local Coastal Program - City of Malibu

ESHA Overlay Map 2:
Zuma Beach to Escondido Beach
June 2, 2011

1. Pg. 4 - SCAG staff should present evidence of attempts to continuously communicate with the City of Malibu in order to obtain information starting in July 2009 up until the January 31, 2010 comments deadline.

2. Pg. 26 – data shown on the Socioeconomic Data bar graph contradicts pg. 8 of the Final Malibu Local Profile Report – May 2011 (LPR) in the following ways:
   a. The value given for the number of households in 2008 is 5,355. The LPR shows that the number of households was 5,267 in 2010, which is a decrease of 88 households. Please rectify these statistics.
   b. According to the LPR, between 2000 and 2010 there were a total of 130 new households in Malibu, which breaks down to 13 new households per year. The graph shows a gain of 439 households over the 12 year period between 2008 and 2020 (an approximate gain of 37 households per year) and a forecasted gain of an additional 482 households between 2020 and 2035 (an approximate gain of 32 households per year). These numbers are more than double the gain which was demonstrated in the Census between 2000 and 2010. What is the basis for this forecasted increase in household growth?
   c. In 2008, the LPR shows 8,880 jobs and the bar graph shows 8,886 jobs for 2008. Small discrepancy.
   d. The LPR shows 8,197 jobs for 2010, which accounts for a loss of 683 jobs between 2008 and 2010. What is this loss attributed to?

3. Pg. 28 – type on zoning categories, should be “Multi-Family Beach Front” not Multi-Family Beach Front
June 16, 2011

Stephen R. Burrell  
City Manager  
City of Hermosa Beach  
1315 Valley Drive  
Hermosa Beach, California 90254-3885

Dear Mr. Burrell,

Thank you for taking the time to share the City of Hermosa Beach’s concerns regarding the Regional Housing Needs Assessment (RHNA). We included your letter, dated April 18, 2011, as part of the agenda packet in the May 27, 2011 RHNA Subcommittee meeting. On June 6, 2011, we met with City staff to discuss some of the concerns outlined in your letter.

In regards to the requirements for suitable sites, we regret that the Southern California Association of Governments (SCAG) does not have the authority to address the issue during the RHNA process since it is outlined in Housing Element Law and is reviewed by the state Department of Housing and Community Development (HCD). However, we acknowledge that a substantial portion of Hermosa Beach’s RHNA allocation is associated with replacement housing units; and that the City is required to find suitable sites for replacement construction regardless of the appropriate income category.

To address this situation, SCAG proposes that during its consultation with HCD, considerations will be suggested in regards to the reasonableness of treating replacement housing need in the same way as new housing units projected to accommodate future household growth by income category. As a result, SCAG proposes using a lower housing replacement rate for the entire region compared to the rate used in the 2007 RHNA, which will lower the replacement need for each jurisdiction for the 2012 RHNA.

SCAG will distribute a replacement need survey this week to all jurisdictions to determine the types of units demolished and number of rebuilt units. This data will assist us in our discussion with HCD for a lower replacement housing need and appropriate income allocation. We hope that you will be able to provide us with the information on demolition and building activity in your City that can support our approach to the application of replacement need in the RHNA process.

If you have any other questions, please do not hesitate to contact Ma’Ayn Johnson at (213) 236-1975 or johnson@scag.ca.gov. We look forward to your input and are committed to ensuring a fair and transparent RHNA process.

Sincerely,

Hasan Ikhrata  
Executive Director  
Southern California Association of Governments

HI: mj

The Regional Council is comprised of 84 elected officials representing 190 cities, six counties, six County Transportation Commissions and a Tribal Government representative within Southern California.
DATE: June 24, 2011

TO: Regional Housing Needs Assessment (RHNA) Subcommittee

FROM: Frank Wen; Manager, Research, Analysis and Information Services; 213-236-1854; wen@scag.ca.gov

SUBJECT: Demolition Permits and the Determination of RHNA Replacement Need

EXECUTIVE DIRECTOR’S APPROVAL: [Signature]

RECOMMENDED ACTION:
For Information Only – No action to be taken.

EXECUTIVE SUMMARY:
Consistent with the process to better estimate replacement housing needs recommended in the RHNA consultation packet to the State Department of Housing and Community Development (HCD)/Department of Finance (DOF), staff compiled demolition data (Figure 1 & Attachment 1) for local jurisdictions in the SCAG region from 2001 to 2011. Also provided in this report is the original DF-HU Housing Unit Change Form (with instructions) that each local jurisdiction was instructed to use by DOF to report the number of demolished housing units during a select time frame in 2010 (Attachment 2). Currently, staff plans to offer guidance to local jurisdictions on how to evaluate and review DOF’s housing demolition data for accuracy and fitness in establishing a replacement housing goal for the locality. SCAG has also sought local input to generate a figure on the fair representation of housing unit losses during the RHNA projection period of January 1, 2011 to September 30, 2021 through the use of a survey that was reviewed by the Subregional Coordinators Group and distributed to all cities and counties in the SCAG region earlier this month (Attachment 3). Staff plans to review the input received from local jurisdictions and will complete this task by July 22, 2011.

STRATEGIC PLAN:
This item supports SCAG’s Strategic Plan, Goal 4: Develop, Maintain and Promote the Utilization of State of the Art Models, Information Systems and Communication technologies, Objective b: Develop, maintain and enhance data and information to support planning and decision making in a timely and effective manner.

BACKGROUND:

Replacement Housing Allowance

SCAG staff seeks to revisit the data and methodology used in the 4th Cycle of RHNA which utilized historical demolition data submitted by each local jurisdiction, to estimate the replacement housing allowance for the RHNA projection period. In addition to developing and using possibly more appropriate data (through the use of a survey of local jurisdictions) to determine the accurate number of replacement housing allowance for the RHNA, SCAG intends to consult with HCD regarding the reasonableness in treating replacement housing need in the same way as new housing units projected to accommodate future
population/household growth, and use the same income allocation formula and subject to regional fair-share/over-concentration shift policy. The following is background information to facilitate further discussion and consultation.

Background:

SCAG estimates future unit losses in the region's housing stock based on historical demolition data from DOF which is assumed to be a fair representation of housing inventory change due to mobile home removals, natural disasters (fires), reinvestment area recycling to higher density, age and tenure of the housing stock, or conversions (e.g., apartments to condos, a single family house to a professional health office, or multiple units converted into one unit, etc.)

At one time, SCAG projections utilized the replacement rates recommended by HCD: 2% per decade, or 0.2% per year. However, when this rate was applied to each jurisdiction, it resulted in unrealistic estimates for many places, both for faster-growing areas with newer housing and in slower-growing established places that were not experiencing the recycling levels anticipated. For this reason, SCAG adopted a more tailored approach.

SCAG calculates future replacement need by looking back at the last 10 years of demolition permits for each jurisdiction, assuming that these demolished units are permanently lost and will require replacement. However, this approach raises the question, "How well does the DOF demolition data for the 2001 to 2010 period represent the potential "net" loss rates (capacity or housing units) for the 2010 to 2020 period in each locality?" SCAG has received many arguments from local jurisdictions that the majority of demolished or converted units were made up with subsequent new building permits and construction and, as such, result in net increase in both capacity and housing stock in many cases. In the 4th Cycle of RHNA, using DOF demolition permit data, the SCAG region replacement housing allowance assumed and approved by HCD was over 4% of total housing need. This replacement housing need and share of total construction need seems very high compared with the following rates recently approved by HCD in determining replacement housing allowance of total RHNA housing need for other regions: 1.39% (Butte County); 1.0% (Merced); 1.04% (San Louis Obispo) and 0.7% (SANDAG).

Moreover, SCAG staff sees the potential that jurisdictions could identify suitable sites (HCD’s suitable site criterion is 16 units per site in built-out infill areas) for lower income affordable housing on vacant land even though high housing demand is expected to keep older units in service longer, particularly in smaller built out communities. This approach could point toward a lower estimate of future housing unit loss than is currently supported by historical data.

For these reasons, SCAG is seeking input from local jurisdictions on their historical number of housing unit demolitions and newly constructed/permittted housing units gained during the period of January 1, 2001 to September 30, 2010. With the assistance from the Subregional Coordinators Group, staff generated a survey with targeted questions on this matter, and distributed the material to all cities and counties in the SCAG region earlier this month. Staff will review the responses from local jurisdictions, and will complete work on this task by July 22, 2011.
Topics for Discussion with HCD:

- Pending further discussion (see below) and approval from HCD, SCAG proposes to use a 0.7% replacement allowance rate—same as the rate approved by HCD and used by SANDAG in its RHNA—to estimate the replacement housing need for the SCAG region.
- SCAG and HCD/DOF will discuss the following three issues during consultation process related to replacement housing allowance and determination:
  1. Data
  2. Methodology to accurately estimate the appropriate replacement housing allowance
  3. Income allocation for the replacement housing allowance
- SCAG should provide a draft estimate of replacement housing need to local jurisdictions based on the most recent 10 year set of DOF data and provide guidance on how to evaluate and review DOF data for accuracy and fitness for establishing a replacement housing goal for the locality.
- SCAG has sought local input on historical demolitions to generate a figure on the fair representation of housing unit losses to expect during the RHNA projection period of January 1, 2011 to September 30, 2021. Staff began this work in June and will complete it by July 22, 2011.
- RHNA law did not envision the allocation of lower income need to replacement housing on sites that were never “suitable sites” and continue not to be suitable sites for lower income housing, nor should unrealistic requirements be placed on local governments to re-zone when it is not practical. SCAG requests that these matters be taken into account in HCD’s land inventory review and criteria by providing flexible alternatives and options for local governments when they identify suitable sites in their own jurisdictions for lower income housing as part of the housing element update process.

Figure 1

![SCAG Region Demolition Permits: 2001 - 2011](image-url)

**SCAG Region Demolition Permits: 2001 - 2011**

- **Los Angeles**
- **Rest of SCAG**

RHNA Subcommittee June 2011
Frank Wen, 6-24-2011
FISCAL IMPACT:
Work on the Growth Forecast is programmed in the FY 2010-2011 SCAG Overall Work Program. The associated work elements are 11-055.SCG0133.01 and 11-055.SCG0133.05.

Attachment 1: SCAG Region Demolition and Conversion Permits by City: 2001 to 2011
Attachment 2: DOF Instructions: DF-HU Housing Unit Change Form
Attachment 3: Housing Unit Demolition Data Survey Form (Long Form and Short Form)

Reviewed by: [Signature]
Department Director

Reviewed by: [Signature]
Chief Financial Officer
## Attachment 1

### SCAG Region Demolition and Conversion Permits By County: 2001 to 2011

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<th>2001 - 2011</th>
<th>SCAG REGION</th>
<th>IMPERIAL COUNTY</th>
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(Source: California Department of Finance)
### SCAG Region Demolition and Conversion Permits By City: 2001 to 2011

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(Source: California Department of Finance)
ATTACHMENT 2

INSTRUCTIONS

DF-HU HOUSING UNIT CHANGE FORM - 4/1/10 THRU 12/31/10

Please return the attached DF-HU survey form to the Department of Finance (Finance) by February 8, 2011. Attention: Demographic Research Unit, Department of Finance, 915 L Street, Sacramento, CA 95814, Fax (916) 327-0222, Telephone No. (916) 323-4086.

INSTRUCTIONS: PLEASE READ CAREFULLY.

Section I. Housing Units Gained

Report all housing unit change information that occurred within your jurisdiction from April 1, 2010 through December 31, 2010.

1. REPORT UNITS GAINED from newly constructed housing units within the given time frame: (Please check ONLY ONE box on the form indicating the source of new construction). Please do NOT provide building permits issued. If you only have building permits issued to indicate new housing construction, report them as indicated below under Adjusted Building Permits, using the time frame: single-family unit permits issued: 10/1/09-6/30/10; and multi-family unit permits issued: 4/1/09-12/31/09. (Refer to Section I, Line 1 of the DF-HU Housing Unit Change Form.)

Final Inspections: Report the number completed between April 1, 2010 and December 31, 2010. OR,

Certificates of Occupancy: Report the number completed between April 1, 2010 and December 31, 2010. OR,

Completed Housing Units: Report the number completed between April 1, 2010 and December 31, 2010. OR,

Utility Releases: Report the number completed between April 1, 2010 and December 31, 2010. OR,

Adjusted Building Permits: Report the number of building permits that were issued for the following time frames: single structure units backdated 6 months were issued from October 1, 2009 to June 30, 2009, and multi-structure units backdated 12 months were issued from April 1, 2009 to December 31, 2009.

Mobile Home Units: Report mobile home unit changes on lots from April 1, 2010 to December 31, 2010 Changes in mobile homes may be reported regardless of the source of new construction.

Contact us at (916) 323-4086 if you are unable to provide the above noted data.

2. REPORT UNITS GAINED from conversions or moved into your jurisdiction. If your jurisdiction gained any new housing units from converting non-residential buildings into housing units, or by converting one type of housing unit structure into a new housing structure, (such as a duplex gained by converting a single family home) or any new housing units gained from military conversions, report these units under "conversions" from April 1, 2010 through December 31, 2010. Also, report any housing units moved into your jurisdiction. (Refer to Section I, Line 2 of the DF-HU Housing Unit Change Form.)

3. REPORT OTHER LOCAL UNITS GAINED from non-permitted activity. Consists of Non-permitted residential units added to college campuses; military units converted to civilian use without the issuance of a building permit; and non-permitted residential units added illegally within your jurisdiction. An example of an illegal unit -- a secondary non-permitted unit intended for residential occupancy added to an existing primary residence.

Section II. Housing Units Lost

The Census Bureau no longer collects demolition data on the C-404 survey. We request local jurisdictions to report all units lost within your jurisdiction from April 1, 2010 through December 31, 2010.

1. REPORT UNITS LOST from fire or demolition. Report residential housing units lost within your jurisdiction from April 1, 2010 through December 31, 2010 from fire, demolition, earthquake, or flood.

2. REPORT UNITS LOST from conversions or moved out of your jurisdiction. Report units lost from converting housing units into non-residential uses, or lost by converting one type of housing unit structure into a new housing structure, (such as a single family home lost by converting it into a duplex from April 1, 2010 through December 31, 2010. Also, report any units that moved out of your jurisdiction.

3. REPORT OTHER LOCAL UNITS LOST from non-permitted activity. Consists of Non-permitted residential units added to college campuses; and non-permitted residential units added illegally within your jurisdiction. An example of an illegal unit -- a secondary non-permitted unit intended for residential occupancy added to an existing primary residence.
Section III. Annexations and Detachments (cities only)

Cities need to list all inhabited annexations and detachments that occurred between April 1, 2010 and December 31, 2010 in this section. For inhabited annexations and detachments, report all existing housing units within the area as of the effective date. Report housing units built after the effective date under Section I - Housing Units Gained. Include the full name of each annexation/detachment and its LAFCO resolution number.

Section IV. Civilian Group Quarters Change

Finance collects group quarters information for military facilities and state and federal institutional facilities. These include California state and federal prisons, youth authority camps, state hospitals, and federal military barracks and ships. You do not need to report on these facilities. Please report all other group quarters, including private college dorms.

Only include group quarters changes that affect the current annual population estimate. Report resident group quarters change information for facilities that opened or closed during the year, or whose resident population significantly changed during the calendar year. Report annexed group quarters facilities in this section. For this survey, only consider changes for facilities that have 100 or more residents. If no significant changes occurred in the last calendar year, write “no change” in this section.

ADDITIONAL INFORMATION

Provide documentation for any additional information that may affect your area’s population. Include the basis of the population change and the source of the information. Finance reviews all additional population change information documented by local areas.

Definitions

Single-detached unit - a one-unit structure with open space on all four sides. The unit often possesses an attached garage.

Single-attached unit - a one-unit structure attached to another unit by a common wall, commonly referred to as a townhouse, half-plex, or row house. The shared wall or walls extend from the foundation to the roof with adjoining units to form a property line. Each unit has individual heating and plumbing systems.

Mobile home unit - a one-unit structure that was originally constructed to be towed on its own chassis.

2-, 3-, and 4-plex units per structure - a structure containing two, three, or four units and not classified as single-unit attached structure. The units in the structure share attic space and heating and plumbing systems.

5 or more units per structure - a structure containing five or more housing units. The units share attic space, and heating and plumbing systems.

Civilian Group Quarters - are non-household residential facilities. Types of Group Quarters facilities include: nursing and convalescent homes; orphanages; shelters; convents; and local facilities for the mentally and physically disabled. Residents living in these facilities have no permanent residence elsewhere.

Note: Condominium refers to an ownership classification, not a structural type. Report condominiums based on their structural types.

Please return the completed survey form by one of the following methods:

- Internet form: URL: http://housingsurvey.dof.ca.gov/hus/index.aspx
- Fax: (916) 327-0222
- E-mail: Daniel.Sheya@dof.ca.gov or Doug.Kuczynski@dof.ca.gov
- Mail: (see the following mailing address)

Department of Finance
Demographic Research Unit
915 L Street, 8th Floor
Sacramento, CA 95814
DF-HU HOUSING UNIT CHANGE FORM

Date of Estimate: 1/1/2011

PLEASE READ ATTACHED INSTRUCTIONS. RETURN THIS FORM TO OUR OFFICE BY February 8, 2011.  
Attention: Demographic Research Unit, Department of Finance, 915 L Street, Sacramento, CA 95814, Fax (916) 327-0222, Tele. No. (916) 323-4086.

City/Town: ___________________________ County: ___________________________

(Office use only)  
Place Code: ___________________________  
Postgres Code: ___________________________

SECTION I. HOUSING UNITS GAINED

Please check the method you reported on this survey for newly constructed units:

☐ Final Inspections completed between 4/1/10 – 12/31/10. Report counts only for units that are ready for occupancy.

If you are unable to provide final inspections, report one of the following types of counts to indicate newly constructed units:

☐ Completed Housing Units, 4/1/10 – 12/31/10;  
☐ Certificates of Occupancy, 4/1/10 – 12/31/10;  
☐ Utility Releases, 4/1/10 – 12/31/10.

If you can only report building permits issued, you MUST adjust the building permits to estimate completions using a different time frame:

Single unit permits issued: 10/1/09 – 6/30/10; Multiple unit permits issued: 4/1/09 – 12/31/09.

### REPORT UNITS GAINED

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<thead>
<tr>
<th>Single Unit Structures</th>
<th>Multiple Unit Structures</th>
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</thead>
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</table>

1. From newly constructed units
2. From conversions OR housing units moved into your jurisdiction
3. From other local units OR non-permitted activity

SECTION II. HOUSING UNITS LOST

From April 1, 2010 through December 31, 2010

1. REPORT UNITS LOST from fire OR demolition
2. REPORT UNITS LOST from conversions OR moved out of your area
3. REPORT UNITS LOST from other local units OR non-permitted activity

SECTION III. ANNEXATIONS AND DETACHMENTS

From April 1, 2010 through December 31, 2010

For Cities Only. Attach additional sheets if necessary.

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<thead>
<tr>
<th>Single Unit Structures</th>
<th>Multiple Unit Structures</th>
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</thead>
<tbody>
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LAFCO Res. No.  
Annexation Short Title & Effective Date

SECTION IV. CIVILIAN GROUP QUARTERS CHANGE

From April 1, 2010 through December 31, 2010

Attach additional sheets if necessary.

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<tr>
<th>Facility Name, Address, Zip Code, &amp; Telephone Number</th>
<th>DATE OF STATUS CHANGE</th>
<th>PERMANENT RESIDENTS</th>
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(Please Print Clearly)

Reported by: ___________________________  
Department: ___________________________  
Title: ___________________________  
Address: ___________________________  
City: ___________________________  
Zip Code: ___________________________  
FAX No.: ( ) ___________________________  
E-mail Address: ___________________________  
Telephone No.: ( ) ___________________________  

Page ____ of ____
Attachment 3

Housing Unit Demolition Survey
Background Information

The purpose of this survey is to obtain information from each local jurisdiction on the number of demolished housing units between 2001 and 2011, and the number of housing units that were constructed on sites with demolitions during this same period. This information will be used to estimate ‘net’ housing losses due to future demolitions, which (subject to HCD consultation and approval) could change both the data and methodology for replacement need determination in the 5th cycle of the RHNA projection period (January 1, 2011 to September 30, 2021). Results from the survey may also serve to initiate a discussion with the State Department of Housing and Community Development (HCD) on an appropriate income distribution formula for allocating replacement housing allowance.

In order to assist local jurisdictions in providing this information, SCAG is offering the option for cities/counties to complete either a ‘short form’ or a ‘long form’ for this survey.

The short form (Sheet 2 in the Survey Spreadsheet) asks cities and counties to provide feedback on historical demolitions data between 2001 and 2011 from the California Department of Finance (DOF), and also requests local jurisdictions to provide information on the number of units that were constructed on sites with previous demolitions during this same period. SCAG estimates that it will take five to six hours to complete the ‘short form’ option for this survey. Historical demolition data from DOF is available for reference in Sheet 1 of the Survey Spreadsheet.

The long form (Sheet 3) requests more detailed information on specific sites with historical demolitions, including (to the extent feasible) the estimated income level of demolished housing units. SCAG estimates that it will take two to three days to complete this form for jurisdictions with less than 500 demolitions, and five to six days for jurisdictions with significantly higher numbers of demolitions.

Finally, when returning the survey, please provide your best estimate of ‘replacement allowance’ that should be used in your jurisdiction for the next RHNA projection period (January 1, 2011 to September 30, 2021) to account for ‘net’ losses in housing units or development capacity (based on historical demolition data, assessment in this survey, and future development patterns (infill, conversion, others).

To facilitate the consultation process with HCD in determining the SCAG region total housing need for the 5th cycle of RHNA, please complete the survey by July 15th and submit it to SCAG staff Javier Minjares (minjares@scag.ca.gov).

If cities/counties choose to not participate in this survey, SCAG will not be able to calculate “net” housing losses and will revert to the previous RHNA cycles’ practice of using historical demolition data from DOF as the basis to calculate future replacement housing need.

Replacement Housing Allowance Background Information

As recommended in the RHNA consultation packet to HCD/DOF, SCAG staff seeks to revisit the data and methodology used in the 4th Cycle of RHNA, which utilized historical demolition data submitted by each local jurisdiction to estimate the replacement housing allowance for the
RHNA projection period. In addition to developing more appropriate data to determine the accurate number of replacement housing allowance for the RHNA, SCAG intends to also consult with HCD regarding the reasonableness in treating replacement housing needs in the same way as new housing units (which are projected to accommodate future population/household growth), while using the same income allocation formula (subject to regional fair-share/over-concentration shift policy).

In the past, SCAG calculated future replacement need by looking back at the last 10 years of demolition permits for each jurisdiction (as reported by DOF), and assumed that these demolished units were permanently lost and required replacement. However, this approach raises the question, "How well does DOF demolition data for the 2001 to 2010 period represent the potential ‘net’ loss rates (capacity or housing units) for the 2011 to 2021 period in each locality?" SCAG has received many comments from local jurisdictions that the majority of demolished or converted units were replaced with subsequent new building permits and construction. As such, this could potentially result in a net increase in both capacity and housing stock in many cases. For this reason, SCAG is looking to local jurisdictions to provide information on historical demolitions in their communities through the use of this survey.

Accessing the Survey

Electronic versions of the survey are available on SCAG’s FTP site for download. Further instructions on completing the survey are contained within each spreadsheet. Please see the URL below to download the appropriate spreadsheet for your jurisdiction. Once this URL is entered in any internet browser, a zipped version of the Survey Spreadsheet will automatically start downloading to the user’s computer.

Local Jurisdictions in Imperial County:
ftp://javierm:scag123@data.scag.ca.gov/Demolition_Survey_Form_IM.zip

Local Jurisdictions in Los Angeles County:
ftp://javierm:scag123@data.scag.ca.gov/Demolition_Survey_Form_LA.zip

Local Jurisdictions in Orange County:
ftp://javierm:scag123@data.scag.ca.gov/Demolition_Survey_Form_OR.zip

Local Jurisdictions in Riverside County:
ftp://javierm:scag123@data.scag.ca.gov/Demolition_Survey_Form_RV.zip

Local Jurisdictions in San Bernardino County:
ftp://javierm:scag123@data.scag.ca.gov/Demolition_Survey_Form_SB.zip

Local Jurisdictions in Ventura County:
ftp://javierm:scag123@data.scag.ca.gov/Demolition_Survey_Form_VN.zip
### Attachment 4

**HOUSING UNIT DEMOLITION DATA SURVEY FORM (SHORT FORM)**

PLEASE COMPLETE SURVEY FORM AND RETURN THE SURVEY TO OUR OFFICE BY JULY 15, 2023.

**INSTRUCTIONS**

(a) Enter the number of demolished housing units (if appropriate, you can get data from Short Form). Enter the number of affordable housing units among the demolished housing units. (b) Enter the number of newly constructed or permitted housing units on a per month basis. (c) Enter the number of affordable housing units among the newly constructed or permitted housing units. (d) For sites that have been vacated after the demolition but not designated for low-income housing, enter the number of parcels and the potential housing and capacity by each site. (e) For sites that have been converted to non-housing uses after a demolition, or sites that have been vacated after demolitions and zoning is designated for non-housing uses, enter the number of parcels and the potential use of housing and capacity from the changes.

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### Instruction

- **INSTRUCTIONS**
  - **Address:** Enter the address where units are being demolished.
  - **Type:** Identify the type of units being demolished. (8) Type of unit: SFUO (Single-family unit), SFUA (Single-family with attached unit), MHU (Mobile home unit), MFA (Mobile home with attached unit), T2AU (2 or more units, 2 or more stories, 2 or more units, 1 or more stories, 1 or more stories), T3AU (3 or more units, 3 or more stories, 3 or more stories), 4+ (4 or more units, 4 or more stories, 4 or more stories).
  - **Concerns:** Enter the reason for concern from the list of "Fire or Natural Disaster," "Age of Building," "Other." (12) Concerns: Income category from the list of "Affordable," "Moderate," "Low," "Very Low," "Extremely Low." If units of a single property have multiple income categories, please report in one column by income category. (12) Number of new, affordable units in the demolished site. (12) Units that have remained vacant after the demolition where units are designated for demolition, enter the number of units and the potential housing unit capacity on each floor. (12) For units that have been converted to nonconforming uses after demolition, enter the number of units and the potential housing unit capacity from the changes.

### Table

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<th>NOT LEVELLED OR PERMITTED FOR HOUSING USES</th>
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DATE:  June 24, 2011
TO:  Regional Housing Needs Assessment (RHNA) Subcommittee
FROM:  Ma’Ayn Johnson, Senior Regional Planner, 213-236-1975, johnson@scag.ca.gov
SUBJECT:  AB 2158 Survey
EXECUTIVE DIRECTOR’S APPROVAL:  

RECOMMENDED ACTION:
For Information Only - No Action Required.

EXECUTIVE SUMMARY:
As part of the RHNA process, SCAG is required to conduct a survey of local planning factors that will be used to develop the RHNA methodology by state housing law. These local planning factors, also known as the AB 2158 factors, survey all local jurisdictions regarding their land use opportunities and constraints. The survey for the 2012 RHNA was sent out to all SCAG jurisdictions on June 15, 2011.

STRATEGIC PLAN:
This item supports SCAG’s Strategic Plan; Goal 1: Improve Regional Decision Making by Providing Leadership and Consensus Building on Key Plans and Policies; Objective a: Create and facilitate a collaborative and cooperative environment to produce forward thinking regional plans.

BACKGROUND:
Per Government Code Section 65584.04(b), SCAG is required to conduct a survey of each of its jurisdictions regarding planning factors that will affect RHNA household distribution. These factors, also referred to as the AB 2158 factors, provide SCAG input that may affect a jurisdiction’s forecasted household growth and distribution in RHNA methodology. The hearing on the proposed RHNA methodology is anticipated to be held by October 2011, and the hearing on the final RHNA methodology will be held by December 2011.

There are thirteen (13) factors jurisdictions may consider as part of the AB 2158 factors survey, all of which are specified in state housing law:

| Existing and projected job housing balance | Lack of capacity for sewer or water service |
| Availability of land suitable for urban development | Lands protected from urban development under existing programs |
| County policies to preserve agricultural land within an unincorporated area | The distribution of household growth assumed for the Regional Transportation Plan and opportunities to maximize existing transportation infrastructure |
| The loss of low-income housing units in assisted housing developments | The market demand for housing |
| Agreements between a county and cities to direct growth toward unincorporated areas | High housing cost burdens |
| Housing needs of farm workers | Housing needs generated by the presence of a university |
SCAG is required to explain how each of these factors was incorporated into the RHNA methodology. However, per Government Code Section 65584.04 (f), SCAG cannot consider or determine a jurisdiction’s local share using any ordinance, policy, or voter-approved measure that directly or indirectly limits the number of residential building permits issued by a jurisdiction.

During subregional planning sessions focused on the development of the Sustainable Communities Strategy (SCS), held from January through March 2011, SCAG distributed a local planning factors survey corresponding to the AB 2158 factors survey. More than 50 jurisdictions responded to the local planning survey.

On June 16, 2011 SCAG staff distributed the AB 2158 factor survey to all planning directors in the region. Staff also included the results of the earlier local planning factor survey as part of the survey packet to jurisdictions that submitted them. Surveys are due to SCAG by July 15 and will be used to develop the RHNA methodology. Staff will update the RHNA Subcommittee at its July meeting with survey results and recommendations. Staff will also hold several informal sessions around the region to answer questions about the survey and the RHNA process.

**FISCAL IMPACT:**
Work associated with this item is included in the current FY 10-11 General Fund Budget (11-800.0160.03:RHNA).

**ATTACHMENT:**
1. AB 2158 Factors Survey Packet

Reviewed by:

[Signature]

Department Director

Reviewed by:

[Signature]

Chief Financial Officer
AB 2158 Factors

As part of its development of proposed RHNA allocation methodology, SCAG is required by state housing law to consider factors that could affect a jurisdiction’s RHNA allocation. Known as the AB 2158 factors, the factors are listed under Government Code 65584.04 (d) and SCAG is required to survey the following:

1. Existing and projected jobs and housing relationship, i.e. the jobs and housing balance of a jurisdiction
2. Lack of capacity for sewer or water service due to external factors beyond the jurisdiction’s control that preclude the jurisdiction from providing necessary infrastructure for additional development
3. Availability of land suitable for urban development or for conversion to residential use, the availability of underutilized land, and opportunities for infill development and increased density. SCAG cannot solely consider local zoning ordinances or land use restrictions in determining suitable available land
4. Lands protected by federal or state programs, including open space, farmland, or environmental habitats
5. County policies to preserve farmland within an unincorporated area
6. Household growth distribution assumed for the RTP and opportunities to maximize existing transit infrastructure
7. The loss of low-income housing units in assisted housing developments due to contract expirations or termination of use restrictions
8. The market demand for housing
9. Agreements between a county and cities in a county to direct growth towards incorporated areas
10. High-housing cost burdens
11. Farmworker housing needs
12. Student housing needs generated by a university within any member jurisdiction
13. Other factors adopted by SCAG

It is important to note that these factors cannot be used to reduce the total regional need. Moreover, SCAG cannot consider local policies or voter-approved measures that limit the number of residential building permits issued to reduce a jurisdiction’s RHNA allocation.

If your jurisdiction submitted the corresponding local planning survey as part of the Sustainable Communities Strategy (SCS) planning workshops earlier this year, those survey responses are attached to this packet for confirmation. Please note that Factor #7, which might be relevant to your jurisdiction, has been updated for the attached AB 2158 factor survey.

If you have any questions, please contact Ma’Ayn Johnson, Senior Regional Planner, at johnson@scag.ca.gov or 213-236-1975. Please fill out the attached survey and return it no later than Friday, July 15 to:

Southern California Association of Governments
Attn: Ma’Ayn Johnson
818 W 7th Street, 12th Floor
Los Angeles, CA 90017
Email: johnson@scag.ca.gov
Fax: 213-236-1963
# Southern California Association of Governments

Local Planning Factors Survey ("AB 2158 Factors")
Per Government Code Sections 65584.04(b)(1) and (d)

<table>
<thead>
<tr>
<th>Factor</th>
<th>Input</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Existing and projected job housing balance</td>
<td></td>
</tr>
<tr>
<td>2. Lack of capacity for sewer or water service due to federal and state laws, regulations or regulatory actions, or supply and distribution decisions made by a sewer or water service provider other than the local jurisdiction that preclude the jurisdiction from providing necessary infrastructure for additional development during the planning period.</td>
<td></td>
</tr>
<tr>
<td>3. The availability of land suitable for urban development or for conversion to residential use, the availability of underutilized land, and opportunities for infill development and increased residential densities.</td>
<td></td>
</tr>
<tr>
<td>4. Lands preserved or protected from urban development under existing federal and state programs, or both, designed to protect open space, farmland, environmental habitats, and natural resources on a long-term basis.</td>
<td></td>
</tr>
<tr>
<td>5. County policies to preserve agricultural land within an unincorporated area.</td>
<td></td>
</tr>
<tr>
<td>6. The distribution of household growth assumed for purposes of a comparable period of regional transportation plans and opportunities to maximize the use of public transportation and existing transportation infrastructure.</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td>---</td>
<td>---</td>
</tr>
<tr>
<td>7.</td>
<td>The loss of low-income housing units in assisted housing developments due to contract expirations or termination of use restrictions.</td>
</tr>
<tr>
<td>8.</td>
<td>The market demand for housing.</td>
</tr>
<tr>
<td>9.</td>
<td>Agreements between a county and cities in a county to direct growth toward incorporated areas of the county.</td>
</tr>
<tr>
<td>10.</td>
<td>High housing costs burdens.</td>
</tr>
<tr>
<td>11.</td>
<td>Housing needs of farm workers.</td>
</tr>
<tr>
<td>12.</td>
<td>Housing needs generated by the presence of a private university or a campus of the California State University or the University of California within any member jurisdiction.</td>
</tr>
<tr>
<td>13.</td>
<td>Other factors beyond those found in Government Code 65584.04 (d). Suggestions are welcome.</td>
</tr>
</tbody>
</table>
DATE:       June 24, 2011

TO:         Regional Housing Needs Assessment (RHNA) Subcommittee

FROM:       Ma’Ayn Johnson, Senior Regional Planner, 213-236-1975, johnson@scag.ca.gov
            Frank Wen, Manager, Research, Analysis and Information Services, 213-236-1854,
            wen@scag.ca.gov

SUBJECT:    RHNA Social Equity Adjustment

EXECUTIVE DIRECTOR’S APPROVAL:  

RECOMMENDED ACTION:
Recommend that the Subcommittee recommend to the Community, Economic and Human Development
Committee (CEHD) that a 110% social equity adjustment be included as part of the proposed RHNA
methodology to mitigate the overconcentration of certain income categories.

EXECUTIVE SUMMARY:
As part of the RHNA methodology, SCAG is required to address the overconcentration of income groups
for communities that have a disproportionate share of certain income categories. For the 2007 RHNA
(the 4th cycle), SCAG applied a 110% adjustment using the respective median county income. Staff
recommends that a 110% adjustment be incorporated into the 2012 RHNA (the 5th cycle) methodology to
address the fair share goals of state housing law.

STRATEGIC PLAN:
This item supports SCAG’s Strategic Plan; Goal 1: Improve Regional Decision Making by Providing
Leadership and Consensus Building on Key Plans and Policies; Objective a: Create and facilitate a
collaborative and cooperative environment to produce forward thinking regional plans.

BACKGROUND:
The purpose of the Regional Housing Needs Assessment is to encourage, promote, and facilitate the
development of housing to accommodate the entire regional housing need at all income levels. A stated
objective is to reduce the overconcentration of income groups in a jurisdiction if that jurisdiction has a
disproportionately high share of households in a particular income category, as compared to the countywide
distribution of households.

A social equity adjustment will move a jurisdiction’s income category breakdown towards the respective
county income distribution using the median county income. At the May 27, 2011 RHNA Subcommittee
meeting, the application of social equity adjustments was discussed along with examples of different
percentage adjustments. The calculation to determine the income category breakdown for each jurisdiction
using a social equity adjustment is included in Attachment 1 to this report.

For the 2007 RHNA, the adopted SCAG methodology required that each jurisdiction reduce the gap
between their current household income distribution and the county distribution by adjusting their respective
levels to 110% of the county distribution. The county median household income benchmark was derived
from the 2000 Census. This social equity adjustment was determined to fully address the statutory planning

SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS
requirement to achieve one of the statutory RHNA objectives and avoid further concentration of lower income households in “impacted” communities.

Staff has outlined three possible social equity adjustment percentages to address the social equity requirement of RHNA law. A summary of the social equity adjustment examples are included in Attachment 2.

1. **Apply a 100% Social Equity Adjustment**
   A 100% social equity adjustment would modify a jurisdiction’s income category to the county distribution. This would satisfy the legal requirements of RHNA since it will have some impact on areas with overconcentration of certain income categories. However, this adjustment might not be high enough to meet the goals of avoiding overconcentration if certain areas within the county are more heavily impacted than others.

2. **Apply a 110% Social Equity Adjustment**
   A 110% social equity adjustment would modify a jurisdiction’s income category distribution towards the county distribution by 110%, as was applied in the 2007 RHNA methodology. This percentage not only progresses towards the county distribution, but also moves beyond the county distribution to meet the diversity goals of RHNA law.

3. **Apply a 125% Social Equity Adjustment**
   A 125% social equity adjustment would modify a jurisdiction’s income category distribution towards the county distribution by 125%. In addition to adjusting towards the county distribution, this percentage is more aggressive than the other two options and has the possibility of considerably altering the current income breakdown of individual jurisdictions.

To mitigate the overconcentration of certain income groups, SCAG staff recommends that Option 2, applying a 110% social equity adjustment, be recommended to CEHD to be included as part of the proposed RHNA methodology. A 110% adjustment progresses over the county distribution in order to meet the diversity goals in state housing law but does not aggressively alter the current breakdown relative to higher adjustment.

**FISCAL IMPACT:**
Work associated with this item is included in the current FY 10-11 General Fund Budget (11-800.0160.03:RHNA).

**ATTACHMENT:**
1. Example: Application of Social Equity Adjustments
2. Example: Summary of Social Equity Adjustments

Reviewed by:

Department Director

Reviewed by:

Chief Financial Officer
Attachment 1
Application of Social Equity Adjustment

Example 1: City A, high concentration of lower income groups

Countywide Distribution:

<table>
<thead>
<tr>
<th>Very Low</th>
<th>Low</th>
<th>Moderate</th>
<th>Above Moderate</th>
</tr>
</thead>
<tbody>
<tr>
<td>24.7%</td>
<td>15.7%</td>
<td>17.1%</td>
<td>42.6%</td>
</tr>
</tbody>
</table>

City A Distribution:

<table>
<thead>
<tr>
<th>Very Low</th>
<th>Low</th>
<th>Moderate</th>
<th>Above Moderate</th>
</tr>
</thead>
<tbody>
<tr>
<td>29.5%</td>
<td>16.8%</td>
<td>16.6%</td>
<td>37.1%</td>
</tr>
</tbody>
</table>

Using a 110% adjustment, the final adjusted allocation for City A would be as follows:

Step 1: Difference between County and City A

<table>
<thead>
<tr>
<th>Very Low</th>
<th>Low</th>
<th>Moderate</th>
<th>Above Moderate</th>
</tr>
</thead>
<tbody>
<tr>
<td>= 24.7% - 29.5%</td>
<td>= 15.7% - 16.8%</td>
<td>= 17.1% - 16.6%</td>
<td>= 42.6% - 37.1%</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Very Low</th>
<th>Low</th>
<th>Moderate</th>
<th>Above Moderate</th>
</tr>
</thead>
<tbody>
<tr>
<td>-4.8%</td>
<td>-1.1%</td>
<td>+0.5%</td>
<td>+5.5%</td>
</tr>
</tbody>
</table>

Step 2: Multiply by 110% ratio (1.1)

<table>
<thead>
<tr>
<th>Very Low</th>
<th>Low</th>
<th>Moderate</th>
<th>Above Moderate</th>
</tr>
</thead>
<tbody>
<tr>
<td>= -4.8% x 1.1</td>
<td>= -1.1% x 1.1</td>
<td>= 0.5% x 1.1</td>
<td>= 5.5% x 1.1</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Very Low</th>
<th>Low</th>
<th>Moderate</th>
<th>Above Moderate</th>
</tr>
</thead>
<tbody>
<tr>
<td>-5.28%</td>
<td>-1.21%</td>
<td>0.55%</td>
<td>6.05%</td>
</tr>
</tbody>
</table>

Step 3: Apply to income category breakdown

<table>
<thead>
<tr>
<th>Very Low</th>
<th>Low</th>
<th>Moderate</th>
<th>Above Moderate</th>
</tr>
</thead>
<tbody>
<tr>
<td>= 29.5% - 5.28%</td>
<td>= 16.8% - 1.21%</td>
<td>= 16.6% + 0.55%</td>
<td>=37.1% + 6.05%</td>
</tr>
</tbody>
</table>

City A Post 110% Adjustment

<table>
<thead>
<tr>
<th>Very Low</th>
<th>Low</th>
<th>Moderate</th>
<th>Above Moderate</th>
</tr>
</thead>
<tbody>
<tr>
<td>24.2%</td>
<td>15.6%</td>
<td>17.1%</td>
<td>43.1%</td>
</tr>
</tbody>
</table>

Example 2: City B, high concentration of high income groups

<table>
<thead>
<tr>
<th>Very Low</th>
<th>Low</th>
<th>Moderate</th>
<th>Above Moderate</th>
</tr>
</thead>
<tbody>
<tr>
<td>County Pre-adjustment</td>
<td>24.7%</td>
<td>15.7%</td>
<td>17.1%</td>
</tr>
<tr>
<td>City B Pre-adjustment</td>
<td>15.2%</td>
<td>10.1%</td>
<td>13.8%</td>
</tr>
<tr>
<td>City B Post 110% adjustment</td>
<td>25.6%</td>
<td>16.3%</td>
<td>17.4%</td>
</tr>
</tbody>
</table>
Attachment 2
Summary of Social Equity Adjustment

Example 1: City A, high concentration of lower income groups

<table>
<thead>
<tr>
<th></th>
<th>Very Low</th>
<th>Low</th>
<th>Moderate</th>
<th>Above Moderate</th>
</tr>
</thead>
<tbody>
<tr>
<td>County Pre-adjustment</td>
<td>24.7%</td>
<td>15.7%</td>
<td>17.1%</td>
<td>42.6%</td>
</tr>
<tr>
<td>City A Pre-adjustment</td>
<td>29.5%</td>
<td>16.8%</td>
<td>16.6%</td>
<td>37.1%</td>
</tr>
<tr>
<td>100% adjustment</td>
<td>24.7%</td>
<td>15.7%</td>
<td>17.1%</td>
<td>42.6%</td>
</tr>
<tr>
<td>110% adjustment</td>
<td>24.2%</td>
<td>15.6%</td>
<td>17.1%</td>
<td>43.1%</td>
</tr>
<tr>
<td>125% adjustment</td>
<td>23.5%</td>
<td>15.4%</td>
<td>17.2%</td>
<td>43.9%</td>
</tr>
</tbody>
</table>

In the example above, City A has a higher concentration of lower income categories compared to the County “average”. The income distribution for each category will move up or down in comparison to the County average, depending on whether it is higher or lower than the County.

Example 2: City B, high concentration of high income groups

<table>
<thead>
<tr>
<th></th>
<th>Very Low</th>
<th>Low</th>
<th>Moderate</th>
<th>Above Moderate</th>
</tr>
</thead>
<tbody>
<tr>
<td>County Pre-adjustment</td>
<td>24.7%</td>
<td>15.7%</td>
<td>17.1%</td>
<td>42.6%</td>
</tr>
<tr>
<td>City B Pre-adjustment</td>
<td>15.2%</td>
<td>10.1%</td>
<td>13.8%</td>
<td>60.9%</td>
</tr>
<tr>
<td>100% adjustment</td>
<td>24.7%</td>
<td>15.7%</td>
<td>17.1%</td>
<td>42.6%</td>
</tr>
<tr>
<td>110% adjustment</td>
<td>25.6%</td>
<td>16.3%</td>
<td>17.4%</td>
<td>40.7%</td>
</tr>
<tr>
<td>125% adjustment</td>
<td>27.1%</td>
<td>17.0%</td>
<td>17.9%</td>
<td>38.0%</td>
</tr>
</tbody>
</table>