



PLANNING DIVISION

CITY OF TEMPLE CITY 9701 LAS TUNAS DR. TEMPLE CITY, CA 91780 (626) 285-2171

October 26, 2020

SCAG RHNA Appeals Board
Southern California Association of Governments
900 Wilshire Blvd, Ste 1700
Los Angeles, CA 90017

RE: Temple City RHNA Allocation Appeal Letter

Honorable Chair and Members of the RHNA Appeals Board:

We appreciate the work the Committee does to plan for the region's housing growth fairly and intelligently. The basic methods and ideas used are reasonable at a regional level. However, we believe that when applied to Temple City this one-size-fits-all approach needs adjusting to reflect Temple City's unique place in the region. Furthermore, we believe that the methodology needs to be reapplied based on new information that demonstrates the COVID-19 pandemic's influence on housing needs in general and anticipated housing types in particular. The following serves as supporting documentation to Temple City's RHNA allocation appeal and is meant to provide a clearer and fuller argument on Temple City's bases for appeal.

Application of the adopted Final RHNA Methodology for the 6th Cycle RHNA

The data in the final RHNA methodology is inaccurate and needs to be updated based on existing (i.e. pandemic-affected) and reasonably ascertainable post-pandemic conditions. The RHNA allocation is based on the following data which has changed drastically:

- *The number of jobs available within 30 minutes* – As people work from home and businesses have stated that they will allow for continued working from home in the future, the location of jobs and their distance from homes have been affected without reflection in the RHNA allocation.
- *Vacancy rates* – People have moved out of higher-density living, and demand in ex-urban locations has increased. Jurisdictions hard hit by the pandemic will likely see

increases in vacancy rates as eviction moratoriums end; the RHNA allocations must take these changes in demand into account.

- *Jurisdiction incomes* – Some lower-wage workers (grocery store clerks, delivery people, and such) have been able to maintain their jobs and keep their income while higher-wage (tourism jobs, entertainment industry, restaurant owners, and such) have not; the RHNA allocations must take into account measurable changes in housing demand across income levels.

Existing or projected jobs-housing balance

The California State Department of Finance estimates that in 2020 the City of Temple City has 12,369 housing units ([link](#)). The proposed total RHNA allocation for Temple City would have the City plan for an additional 2,182 housing units. The City has 5,965 jobs and a population of 36,150 for a current jobs-housing ratio of 0.48. Temple City is a bedroom community with very few jobs in its jurisdictional boundaries due to the way the City was incorporated in 1960. Placing an additional 2,182 housing units at the current persons-per-household rate of 3.04, the City would plan for an additional 6,633 residents. This would only exacerbate the City's current jobs-housing imbalance. The American Planning Association states that a target jobs-housing ratio is 1.5, with a recommended range of 1.3 to 1.7, as compared to the 0.48 ratio in Temple City. The proposed RHNA allocation would move the City's jobs-housing ratio even further from the ideal, seeing it fall from 0.48 to 0.41. Just to keep the City at its current jobs-housing ratio, Temple City would need to add approximately 1,100 jobs or the equivalent of 3 Wal-Mart stores; an impossibility given that the City is completely built out, and--except for school campuses--does not have sites large enough to house 1,100 jobs.

Sewer or water infrastructure constraints for additional development

Temple City's most recent [Sewer Master Plan](#) demonstrates that the City's sewer system is inadequate to provide sufficient capacity for the proposed RHNA allocation. Most of the sewer system is clay pipe laid in the 1950s and 1960s, much of which has reached and exceeded its life expectancy (50 to 60 years). In terms of the deficiency, the City's Sewer Master Plan of 2017 identified four levels of deficiency classified as Priority 1 through Priority 4. The sewer system was never designed to provide capacity for the 12,369 housing units, let alone the additional 2,182 housing unit proposed to be allocated in this RHNA cycle. CEQA would normally require new development to pay for its impact on the existing system. However, the difficulty is that the City cannot collect impact fees from accessory dwelling units to provide needed sewer infrastructure. In addition, raising impact fees to the levels required to provide sufficient sewer capacity would be considered a constraint on housing by the State of California Housing and Community Development Department. The addition of 2,182 additional units, with the financial

constraints placed on the City by State law, would result in failures to the outdated sewer system.

The region's greenhouse gas emissions targets

The City understands that SCAG has prioritized distribution of existing and projected housing needs based on the population within High-Quality Transit Areas and Transit Priority Areas. Doing so takes into consideration an important planning principle of placing growth around transit, which reduces vehicle miles traveled per capita and greenhouse gas emissions per capita. These are important goals for the entire region.

Planning for an additional 2,182 housing units in a transit and jobs desert (see Attachment A) is not "smart growth" and works against SCAG's own sustainable communities strategy as well as the region's greenhouse gas emissions target. That is, allocating thousands of housing units to Temple City where there are very few jobs and very little transit service means that every new resident will have to travel long distances to work, thereby increasing congestion, air quality impacts, and greenhouse gas emissions. Furthermore, the proposed RHNA allocation is not consistent with the goal of reducing VMT per capita, the City's own VMT CEQA thresholds of significance, or SCAG's VMT per capita goals. That the proposed allocation violates not only intelligent regional planning principles, but SCAG's own goals shows its unsustainability.

Availability of land suitable for urban development or for conversion to residential use

Constructing multi-family housing or significant amounts of new single-family housing in built-out cities like Temple City is extremely difficult. Besides tiny remnant parcels left over from peculiar subdivisions, the City does not contain significant vacant property that is easily aggregated to provide significant numbers of new units.

The proposed allocation of units for Temple City is unprecedented. Planning for the construction of these units over a longer timeframe might be possible, but the amount of growth over such a short timeframe in a fully developed city is inconceivable. Based on SCAG's draft RHNA allocation, the city would receive a total allocation of 2,182 housing units. To put this in perspective, the California State Department of Finance estimates that Temple City has approximately 12,369 housing units. This would equate to planning for an 18 percent increase in housing units to somehow take place in an 8-year period. To further put this in perspective, in the 30-year period from 1990 to 2019, the City grew by approximately 1,062 housing units. On average, that is 35.4 housing units per year. Given historical growth rates, the draft RHNA allocation demands 61 years of growth take place an 8-year period. Planning for the additional growth in housing would be a difficult task in any jurisdiction; it will

be a herculean task in a city that simply lacks sufficient and suitable land. In a built-out city with infrastructure constructed more than 70 years ago, it is important to phase in growth over a longer time frame to allow the expansion of very costly infrastructure. Placing such a large demand on the City's sewers system without the time or funds to increase capacity could lead to sewage overflows into stormwater systems, a result that has occurred in neighboring jurisdiction and leads to dramatic environmental impacts. Pressing decades of growth into such a short span will place a heavy burden on the City's infrastructure that will create unanticipated consequences and financial burdens for the City and property owners.

Affirmatively furthering fair housing

Temple City's policies and history show that the City affirmatively supports furthering fair housing. Over the last four decades, Temple City has become more racially diverse than Los Angeles County and has nearly the same percentage of residents in poverty as Los Angeles County (see Attachment A). The City understands the importance of providing additional housing in Temple City to further the goal of fair housing. This important goal should be implemented in a manner that also supports "smart growth," as the City and the Community thoughtfully demonstrated in its most recent General Plan update. Requiring more housing units beyond the historical norm of the past few RHNA cycles in a community where transit opportunities and jobs opportunities are significantly challenged from a land use perspective does not help further this vital objective.

Changed circumstances per government code 65584.05(b) – COVID-19.

With the COVID-19 pandemic, how and where people work, where they live and want to live, and their use of transit have all changed dramatically. On October 1, the San Francisco Chronicle ran an article entitled "S.F. hits highest office vacancy rate in nearly a decade." The commercial real estate firm CBRE reported that in the second quarter leasing activity fell by 44 percent in comparison with the second quarter of 2019. How people work and where they work has changed dramatically. This has and will change the underlying assumptions on which the RHNA allocation was determined. In addition, SCAG's own "Snapshot of COVID-19 Transportation Impacts in the SCAG region" shows that in the SCAG region bus ridership is down 71 percent from April 2020 to April 2019. Rail ridership in Los Angeles has declined 67.9 percent, year-over-year.

Governments need more information and time to study the changing plans and desires of the public in order to determine whether additional housing and employment should be planned around higher density transit stations in the urban core or at transit stations in the suburbs. Government bodies and transit agencies need to consider whether housing should be placed

adjacent to transit lines or stations that demonstrated high use pre-pandemic, or whether bus lines should be reimagined based on anticipated new transit patterns. Jurisdictions need more time to watch how these travel patterns, economic changes, land use changes, working patterns, housing preference changes will continue to affect the underlying assumptions of this RHNA allocation. Simply allocating many units to a transit and jobs “desert” as described above runs counter not only to current methodologies but to intelligent long-term regional planning.

Conclusion

In earnestly updating the City's General Plan, Temple City has honestly demonstrated a sincere effort to meet the State's objective of providing more housing in a manner that affirmatively furthers fair housing. The unprecedented housing allocation reflected in the draft RHNA allocation for Temple City is not:

- Realistic or achievable
- Good planning
- Based on the most recent data which was affected by the COVID-19 pandemic
- Improving the City's jobs-housing balance
- Considering the City's sewer capacity
- In-line with SCAG's S.C.S. and greenhouse gas emission goals
- Reflective of the lack of suitable land
- Supportive of affirmatively furthering fair housing

The City appreciates the difficult position that SCAG is in and is grateful for the time and attention to the City's appeal request and respectfully requests a reasonable and realistic revised RHNA allocation.

Should you have any questions regarding this matter, please do not hesitate to contact me at (626) 285-2171 or sreimers@templecity.us.

Sincerely,

A handwritten signature in blue ink that reads "Scott Reimers". The signature is fluid and cursive, with the first name "Scott" and last name "Reimers" clearly legible.

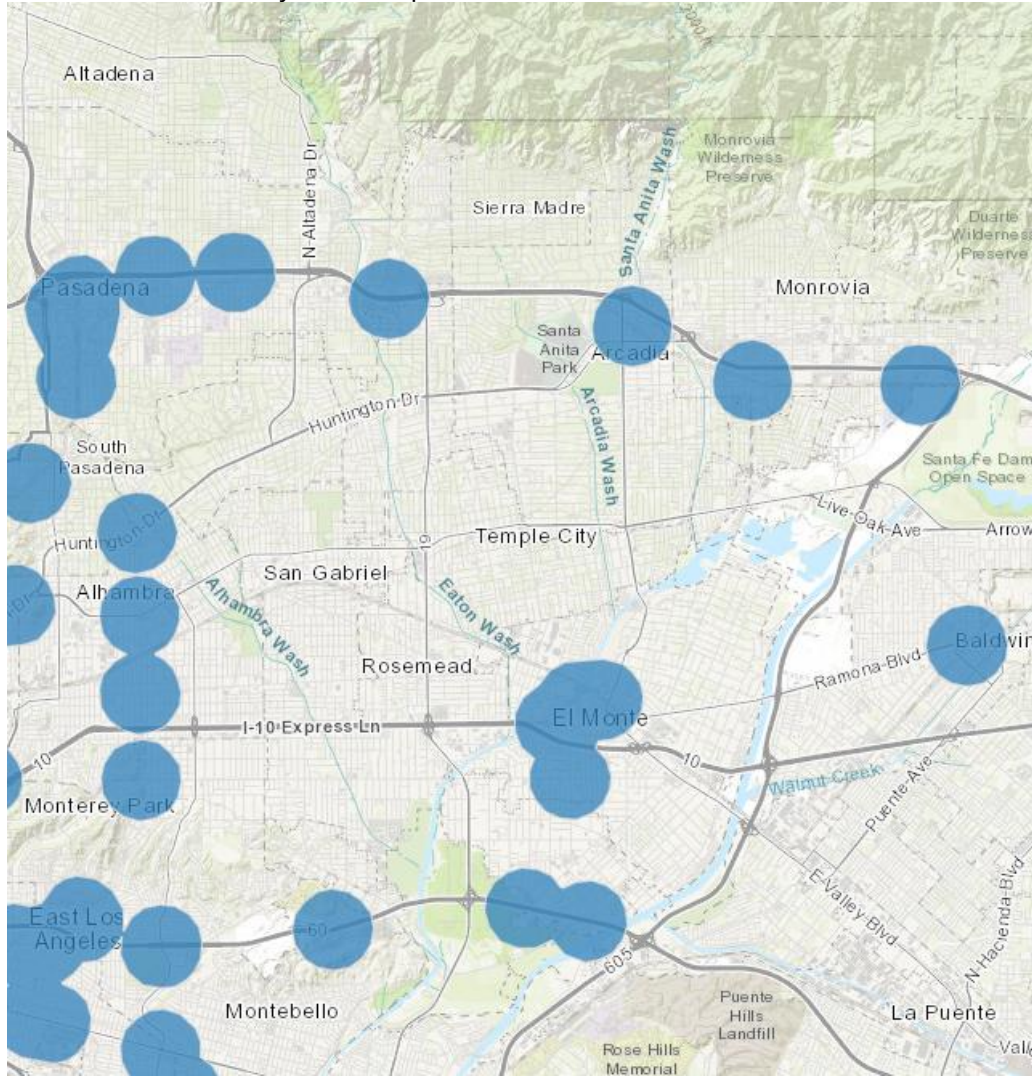
Scott Reimers

Community Development Director

Enclosed: Attachment A (Transit Priority Map, Jobs Map, Temple City and Los Angeles County Census Quick Facts)

ATTACHMENT A

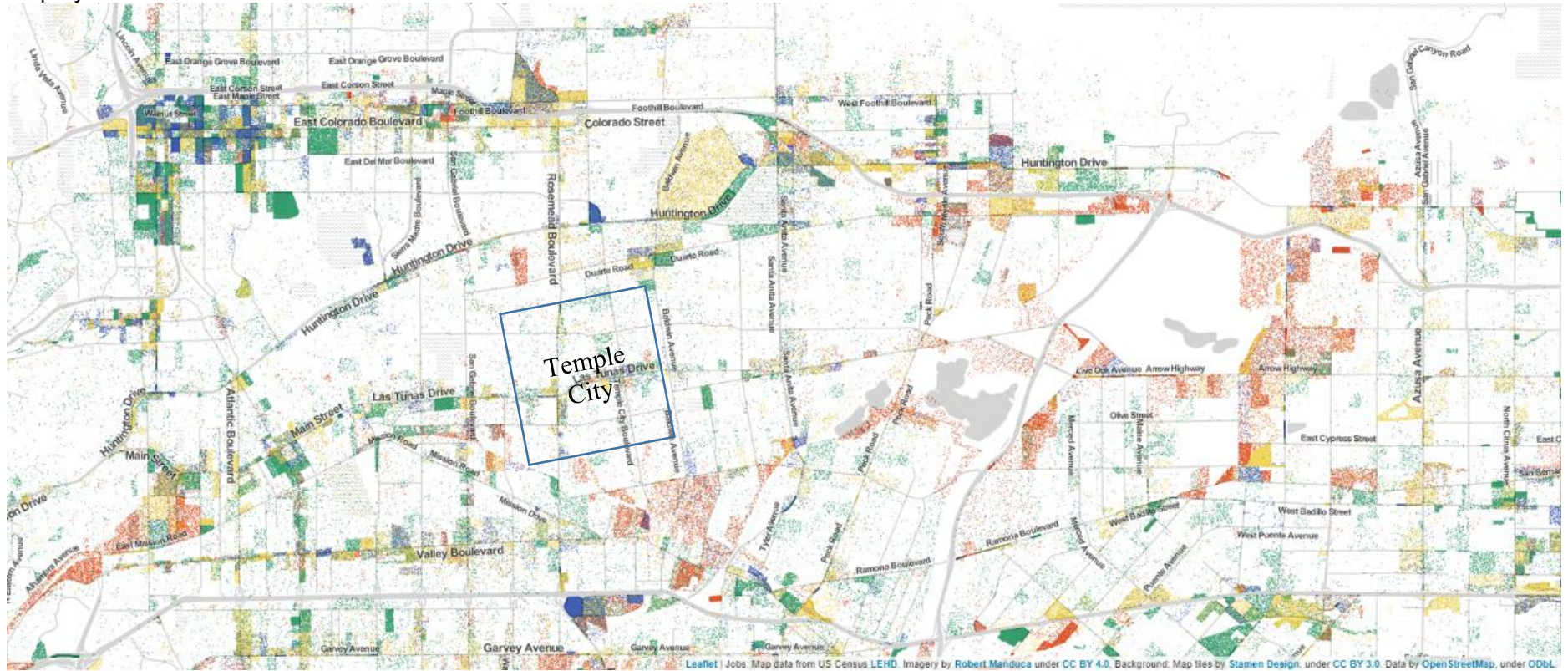
SCAG's Transit Priority Area Map 2045



[WebLink](#)

ATTACHMENT A – CONTINUED

Employment in America, 2014



<http://www.robertmanduca.com/projects/jobs.html>

ATTACHMENT A – CONTINUED

Los Angeles County Census Quick Facts Race and Hispanic Origin



QuickFacts

What's New & FAQs >

Los Angeles County, California

QuickFacts provides statistics for all states and counties, and for cities and towns with a **population of 5,000 or more**.

CLEAR
TABLE
MAP
CHART
DASHBOARD
MORE

PRINT
CSV
EMAIL
EMBED
TWITTER
FACEBOOK

Table

Race and Hispanic Origin	Los Angeles County, California
Population estimates, July 1, 2019, (V2019)	10,039,107
PEOPLE	
Race and Hispanic Origin	
White alone, percent	70.7%
Black or African American alone, percent (a)	9.0%
American Indian and Alaska Native alone, percent (a)	1.4%
Asian alone, percent (a)	15.4%
Native Hawaiian and Other Pacific Islander alone, percent (a)	0.4%
Two or More Races, percent	3.1%
Hispanic or Latino, percent (b)	48.6%
White alone, not Hispanic or Latino, percent	26.1%

<https://www.census.gov/quickfacts/fact/table/losangelescountycalifornia>

ATTACHMENT A – CONTINUED

Temple City Census Quick Facts Race and Hispanic Origin



QuickFacts Temple City city, California

[What's New & FAQs >](#)

QuickFacts provides statistics for all states and counties, and for cities and towns with a **population of 5,000 or more**.

-- Select a fact --
CLEAR
TABLE
MAP
CHART
DASHBOARD
MORE

Table

Race and Hispanic Origin	Temple City city, California
Population estimates, July 1, 2019, (V2019)	35,811
PEOPLE	
Race and Hispanic Origin	
White alone, percent	22.9%
Black or African American alone, percent (a)	0.6%
American Indian and Alaska Native alone, percent (a)	0.5%
Asian alone, percent (a)	62.0%
Native Hawaiian and Other Pacific Islander alone, percent (a)	0.4%
Two or More Races, percent	2.6%
Hispanic or Latino, percent (b)	19.9%
White alone, not Hispanic or Latino, percent	15.4%

<https://www.census.gov/quickfacts/templecitycalifornia>

ATTACHMENT A – CONTINUED

Los Angeles County Census Quick Facts Income and Poverty



QuickFacts

What's New & FAQs >

Los Angeles County, California

QuickFacts provides statistics for all states and counties, and for cities and towns with a **population of 5,000 or more**.

Q temple city, califor -- Select a fact -- CLEAR TABLE MAP CHART DASHBOARD MORE

Table

PRINT CSV EMAIL EMBED TWITTER FACEBOOK

Income & Poverty	Los Angeles County, California
Population estimates, July 1, 2019, (V2019)	10,039,107
PEOPLE	
Income & Poverty	
Median household income (in 2018 dollars), 2014-2018	\$64,251
Per capita income in past 12 months (in 2018 dollars), 2014-2018	\$32,469
Persons in poverty, percent	14.2%

<https://www.census.gov/quickfacts/fact/table/losangelescountycalifornia>

ATTACHMENT A – CONTINUED

Temple City Census Quick Facts Income and Poverty



QuickFacts Temple City city, California

[What's New & FAQs >](#)

QuickFacts provides statistics for all states and counties, and for cities and towns with a *population of 5,000 or more*.

Search: -- Select a fact --

[CLEAR](#) [TABLE](#) [MAP](#) [CHART](#) [DASHBOARD](#) [MORE](#)

Table

Income & Poverty		Temple City city, California
Population estimates, July 1, 2019, (V2019)		35,811
PEOPLE		
Income & Poverty		
Median household income (in 2018 dollars), 2014-2018		\$70,984
Per capita income in past 12 months (in 2018 dollars), 2014-2018		\$29,976
Persons in poverty, percent		11.5%

<https://www.census.gov/quickfacts/templecitycalifornia>